

Table M  
More Restrictive Changes  
Section 1.0 - Use and Application

| ITS #<br>CTS #     | DOC # | Description of Change   | ITS Requirement | CTS Requirement |
|--------------------|-------|---|-----------------|-----------------|
| ITS 1.0<br>CTS 1.0 | M.1   | The CTS definition for CHANNEL FUNCTIONAL TEST states the following: "A CHANNEL FUNCTIONAL TEST shall be the injection of a simulated signal into the channel as close to the primary sensor as practicable to verify OPERABILITY including alarm and/or trip functions". The corresponding ISTS definition for CHANNEL OPERATIONAL TEST adds the following requirements to the CTS definition: " The COT shall include adjustments, as necessary, of the required alarm, interlock, and trip setpoints required for channel OPERABILITY such that the setpoints are within the necessary range and accuracy. The COT may be performed by means of any series of sequential, overlapping, or total channel steps". The CTS definition is being revised to incorporate the additional ISTS requirements.           | 1.1 Definitions | 1.11            |
| ITS 1.0<br>CTS 1.0 | M.2   | The CTS shutdown and refueling Mode requirements in Table 1.1 that specify the transition between shutdown and refueling Modes are revised consistent with the ISTS. The CTS specifies Mode 6 entry when the reactor vessel head is unbolted or removed. The corresponding ISTS Table 1.1-1 requirement for Mode 6 specifies that one or more reactor vessel head closure bolts be less than fully tensioned. Additionally, the ISTS provides a corresponding condition for the reactor vessel head bolts in Modes 4 and 5. The ISTS specifies that in Modes 4 and 5 the reactor vessel head bolts be fully tensioned. This changes the CTS by adding new and different Mode definition requirements for vessel head bolts that define different transition points between the shutdown Modes and Refueling Mode. | 1.1 Definitions | Table 1.1       |
| ITS 1.0<br>CTS 1.0 | M.3   | Unit 1 only. New definitions are added for MASTER RELAY TEST, ACTUATION LOGIC TEST, and SLAVE RELAY TEST consistent with the ISTS. The CTS is revised to conform to the ISTS. This changes the CTS by the addition of new and more specifically defined requirements for instrumentation surveillance testing.  | 1.1 Definitions | 1.0 Definitions |
| ITS 1.0<br>CTS 1.0 | M.4   | A new definition is included for the TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT) consistent with the ISTS. The proposed change revises the CTS by adding a new and more specific requirement for instrumentation surveillance testing.   | 1.1 Definitions | 1.0 Definitions |

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Section 2.0 - Safety Limits

| ITS #<br>CTS # | DOC # | Description of Change | ITS Requirement | CTS Requirement |
|----------------|-------|-----------------------|-----------------|-----------------|
|                |       | NONE                  |                 |                 |

Table M  
 More Restrictive Changes  
 Section 3.0 - LCO and SR Applicability

| ITS #<br>CTS #       | DOC # | Description of Change   | ITS Requirement | CTS Requirement |
|----------------------|-------|---|-----------------|-----------------|
| ITS 3.0<br>CTS 3/4.0 | M.1   | CTS 4.0.2 states, "Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25 percent of the surveillance interval." ISTS SR 3.0.2 introduces a limitation to the application of the surveillance interval extension provided by CTS 4.0.2. ISTS SR 3.0.2 states that "For Frequencies specified as "once," the above interval extension does not apply." The CTS is revised to be consistent with the ISTS. This changes the CTS by limiting the application of the surveillance interval extension permitted by CTS 4.0.2. | SR 3.0.2        | 4.0.2           |

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Section 3.1 - Reactivity Control Systems

| ITS #<br>CTS #                      | DOC # | Description of Change  | ITS Requirement                | CTS Requirement                  |
|-------------------------------------|-------|--|--------------------------------|----------------------------------|
| ITS 3.1.1 &<br>3.1.2<br>CTS 3.1.1.1 | M.1   | ITS SR 3.1.2.1 requires the core reactivity balance to be determined to be within 1% $\Delta k/k$ of the predicted value once prior to entering MODE 1 after each refueling. The CTS does not contain a similar requirement. This changes the CTS by adding an additional performance requirement for the core reactivity balance SR.  | SR 3.1.2.1                     | NA                               |
| ITS 3.1.1 &<br>3.1.2<br>CTS 3.1.1.1 | M.2   | CTS 4.1.1.1.1.e requires SDM to be determined to be within its limit every 24 hours when in MODES 3, 4, and 5. ITS SR 3.1.1.1 requires SDM to be determined to be within its limit in MODE 2 with $K_{eff} < 1.0$ , and MODES 3, 4, and 5. This changes the CTS by expanding the applicability of the Surveillance to include MODE 2 with $K_{eff} < 1.0$ .  | SR 3.1.1.1                     | 4.1.1.1.1.e                      |
| ITS 3.1.1<br>CTS 3.1.1.2            |       | <b>NONE</b>  |                                |                                  |
| ITS-NA<br>CTS 3.1.1.3               |       | <b>NONE</b>  |                                |                                  |
| ITS 3.1.3<br>CTS 3.1.1.4            | M.1   | The CTS 3.1.1.4 Applicability for MTC is Mode 1 and Mode 2 with $K_{eff} \geq 1.0$ . The CTS Actions require the unit to be placed in Mode 3 when the MTC limit is not met. The ISTS applicability for the lower limit includes Modes 1, 2, and 3. The ISTS Action applicable when the lower MTC limit is not met requires that the plant be placed in Mode 4. Consistent with the ISTS, the CTS applicability is expanded to include not only Mode 1 and Mode 2 with $K_{eff} \geq 1.0$ but all of Mode 2 and all of Mode 3 for the lower MTC limit. In addition, the CTS Action requirement applicable when the lower MTC limit is not met is also revised consistent with the ISTS.   | 3.1.3 Applicability and Action | 3.1.1.4 Applicability and Action |
| ITS 3.1.3<br>CTS 3.1.1.4            | M.2   | CTS Surveillance 4.1.1.4.2.b verifies the lower MTC limit is met. The CTS surveillance requires that MTC be verified "At any THERMAL POWER, within 7 EFPD after reaching a RATED THERMAL POWER equilibrium boron concentration of 300 ppm". The ISTS surveillances that verify the lower MTC limit add the following requirements for verifying this limit " If the MTC is more negative than the 300 ppm Surveillance limit (not LCO limit) specified in the COLR, SR 3.1.3.2 shall be repeated once per 14 EFPD during the remainder of the fuel cycle. SR 3.1.3.2 need not be repeated if the MTC measured at the equivalent of equilibrium RTP-ARO boron concentration of $\leq 60$ ppm is less negative than the 60 ppm Surveillance limit specified in the COLR". The CTS is revised by the addition of these new ISTS requirements for verification of the lower MTC limit. | SR 3.1.3.2                     | 4.1.1.4.2.b                      |
|                                     |       |  |                                |                                  |

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| ITS #<br>CTS #                         | DOC # | Description of Change  | ITS Requirement | CTS Requirement |
|--|-------|--|-----------------|-----------------|
| ITS 3.1.8<br>CTS 3.1.2.9               |       | <b>NONE</b>  |                 |                 |
| ITS 3.1.4<br>CTS 3.1.3.1               | M.1   | CTS 3.1.3.1 Action "b" requires that with more than one rod misaligned the Unit be placed in Hot Standby within 6 hours. The corresponding ISTS Action requires that additional Actions be taken in this condition to verify SDM or restore SDM to within limits within 1 hour as well as requiring the unit to be placed in Mode 3 in 6 hours. The CTS is revised to adopt the additional ISTS Actions for SDM.   | 3.1.4 Action    | 3.1.3.1 Action  |
| ITS 3.1.4<br>CTS 3.1.3.1               | M.2   | CTS 3.1.3.1, Action c, states that with one rod misaligned, POWER OPERATION may continue provided that certain actions are completed within one hour. If those actions are not complete, CTS 3.0.3 would be entered which allows 1 hour to initiate action and would require entry into MODE 3 within the following 6 hours. Including the hour allowed in Action c, a total minimum time of 8 hours would be allowed before having to enter Mode 3. The proposed ISTS Condition C, states that if the Required Actions and associated Completion Times are not met, the unit must be in MODE 3 in 6 hours. The shortest Completion Time in the affected Actions is one hour. Therefore, under the ISTS, the minimum time to enter MODE 3 is 7 hours. This changes the CTS by reducing the time that would be allowed before Mode 3 must be entered when the Actions for a misaligned rod have not been completed within the allowed time. | 3.1.4 Action    | 3.1.3.1 Action  |
| ITS 3.1.7.2<br>CTS 3.1.3.2<br>(Unit 2) | M.1   | CTS 3.1.3.2 does not contain an Action to follow if the Required Actions cannot be met. Therefore, CTS 3.0.3 would be entered which would allow 1 hour to plan a shutdown and be in MODE 3 within 7 hours. ISTS 3.1.7 contains Action E which states that the plant must be in MODE 3 within 6 hours if the Required Actions and associated Completion Times are not met. The CTS is revised to incorporate the ISTS Action. This changes the CTS by eliminating the one hour in LCO 3.0.3 to plan a shutdown and, consequently, allowing one hour less for the unit to be in MODE 3.  | 3.1.7.2 Action  | 3.1.3.2 Action  |
| ITS 3.1.7.1<br>CTS 3.1.3.2<br>(Unit 1) | M.1   | CTS surveillance 4.1.3.2.1.a is modified by an * footnote that specifies rod position overlap be verified as follows "During startup and shutdown, overlap must be checked for all control banks at the respective bank overlap height transition points." The corresponding ISTS surveillance SR 3.1.6.3 specifies "Verify sequence and overlap limits specified in the COLR are met for control banks not fully withdrawn from the core every 12 hours." The CTS surveillance is revised consistent with the ISTS. This changes the CTS by 1) requiring that the rod bank withdrawal sequence as well as overlap be verified, 2) that the applicable limits be specified in the COLR, and 3) that the surveillance be performed every  | SR 3.1.6.3      | 4.1.3.2.1       |

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| ITS #<br>CTS #                                      | DOC # | Description of Change  | ITS Requirement     | CTS Requirement                        |
|---|-------|--|---------------------|--|
|   |       | 12 hours instead of only during startup and shutdown.  |                     |  |
| ITS 3.1.4<br>CTS 3.1.3.4                            |       | <b>NONE</b>  |                     |  |
| ITS 3.1.5<br>CTS 3.1.3.5                            | M.1   | The CTS 3.1.3.5 Actions provide the option to "Declare the rod to be inoperable and apply Specification 3.1.3.1" within an hour. The ISTS Actions require that SDM be verified or restored within an hour. The CTS Actions are revised to conform to the ISTS Actions. This changes the CTS by eliminating the option to declare a rod inoperable and apply Specification 3.1.3.1.   | 3.1.5 Actions       | 3.1.3.5 Actions                        |
| ITS 3.1.5<br>CTS 3.1.3.5                            | M.2   | CTS 3.1.3.5 is applicable in MODE 1 and MODE 2 with $k_{eff} \geq 1.0$ . The corresponding ISTS 3.1.5 is applicable in MODES 1 and 2. The CTS is revised to conform to the ISTS. This changes the CTS by expanding the applicability from MODE 2 with the reactor critical to all of MODE 2 (which includes the approach to criticality).  | 3.1.5 Applicability | 3.1.3.5 Applicability                  |
| ITS 3.1.6<br>CTS 3.1.3.6                            | M.1   | CTS LCO 3.1.3.6 requires the control banks to be within the insertion limits specified in the CORE OPERATING LIMITS REPORT. ITS LCO 3.1.6 requires the control banks to be within the insertion, sequence, and overlap limits specified in the COLR. ISTS Condition B provides Actions for not meeting the overlap and sequence requirements, and ISTS SR 3.1.6.3 requires verification of the overlap and sequence every 12 hours. The CTS is revised to conform to the ISTS. This changes the CTS by adding requirements (LCO, Action, and Surveillance) for the overlap and sequence limits to the Insertion Limits TS. | 3.1.6               | 3.1.3.6 LCO, Action, and Surveillances |
| ITS 3.1.6<br>CTS 3.1.3.6                            | M.2   | CTS 3.1.3.6, Action a, requires control banks inserted beyond the insertion limits to be restored within 2 hours. ISTS 3.1.6, Condition A, contains the same requirement and adds the requirements to verify the SDM is within the limits specified in the COLR or initiate boration to restore SDM to within the limit within 1 hour. The CTS is revised to conform to the ISTS. This changes the CTS by adding the requirements to verify SDM or boration to restore the required SDM within one hour when control banks are below the insertion limits.   | 3.1.6 Action        | 3.1.3.6 Action                         |
| ITS - NA<br>CTS 3.10.1,<br>3.10.2, &<br>3.10.3 (U1) | M.1   | The CTS Test Exceptions 3.10.1, for shutdown margin, 3.10.2, for Group Height, Insertion and power distribution limits, and 3.10.3, (Unit 1 only) for pressure & temperature for reactor criticality are all deleted from the TS. The ISTS does not contain any similar test exceptions and the test exceptions are not required for normal plant operation. The CTS is  | NA                  | 3.10.1, 3.10.2, & 3.10.3               |

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| ITS #<br>CTS #  | DOC # | Description of Change  | ITS Requirement | CTS Requirement |
|---|-------|--|-----------------|-----------------|
|   |       | revised to conform to the ISTS.  |                 |                 |
| ITS 3.1.9<br>CTS 3.10.3<br>(Unit 2)<br>CTS 3.10.4<br>(Unit 1) | M.1   | CTS 3.10.3 provides an exception to CTS 3.1.1.4, 3.1.3.1, 3.1.3.5, and 3.1.3.6 during the performance of PHYSICS TESTS and provides restrictions that must be followed when utilizing the exception. The corresponding ISTS Test Exception (ITS 3.1.9) provides an exception to the equivalent ITS LCOs and adds a requirement to the restrictions that must be followed. The ISTS adds the requirement that SDM must be within the limits provided in the COLR. In addition, the ISTS adds a Surveillance to verify the SDM every 24 hours and ACTIONS to follow if the SDM limit is not met. The CTS is revised to conform to the additional ISTS requirements. This changes the CTS by imposing additional requirements on the application of the test exception LCO. | 3.1.9 LCO & SR  | 3.10.3          |
| ITS 3.1.9<br>CTS 3.10.3<br>(Unit 2)<br>CTS 3.10.4<br>(Unit 1) | M.2   | CTS 4.10.3.1 requires THERMAL POWER to be verified to be $\leq 5\%$ once per hour. The corresponding ISTS Surveillance requires the verification be performed every 30 minutes. This changes the CTS by increasing the Frequency of the THERMAL POWER verification.  | SR 3.1.9.3      | 4.10.3.1        |
| ITS 3.1.10<br>CTS - NA  | M.1   | The CTS is revised by the addition of a new Technical Specification (3.1.10, "RCS Boron Limitations < 500 °F"). The addition of this new specification is consistent with the Westinghouse Owners Group (WOG) TSTF-453. TSTF-453 was developed to address issues in Westinghouse Nuclear Safety Advisory Letter (NSAL)-00-016.   | 3.1.10          | NA              |

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Section 3.2 - Power Distribution Limits

| ITS #<br>CTS #         | DOC # | Description of Change   | ITS Requirement          | CTS Requirement    |
|------------------------|-------|---|--------------------------|--------------------|
| ITS 3.2.3<br>CTS 3.2.1 |       | <b>NONE</b>   |                          |                    |
|                        |       |   |                          |                    |
| ITS 3.2.1<br>CTS 3.2.2 |       | <b>NONE</b>   |                          |                    |
|                        |       |   |                          |                    |
| ITS 3.2.2<br>CTS 3.2.3 | M.1   | <p>CTS 3.2.3, Action c, requires that with <math>F_{\Delta H}^N</math> exceeding its limit, subsequent POWER OPERATION may proceed provided that <math>F_{\Delta H}^N</math> is demonstrated through incore mapping to be within its limit at a nominal 50% of RATED THERMAL POWER prior to exceeding this THERMAL POWER, at a nominal 75% of RATED THERMAL POWER prior to exceeding this THERMAL POWER, and within 24 hours after attaining 95% or greater RATED THERMAL POWER. However, under the general rules of TS usage (CTS 3.0.2) these measurements do not have to be completed if at any time compliance with the LCO is reestablished. The corresponding ISTS 3.2.2 Condition A contains a Note that states, "Required Actions A.2 and A.3 must be completed whenever Condition A is entered." ISTS Required Actions A.2 and A.3 require performance of a <math>F_{\Delta H}^N</math> measurement every 24 hours and prior to exceeding 50% RTP, 75% RTP, and within 24 hours after THERMAL POWER <math>\geq</math> 95% RTP. The CTS is revised to conform to the ISTS. This changes the CTS by the addition of the ISTS Note. The ISTS Note requires the Actions that measure <math>F_{\Delta H}^N</math> prior to each specified power level and every 24 hours to be completed even if <math>F_{\Delta H}^N</math> is restored to within its limit and compliance with the LCO is re-established.</p> | 3.2.2 Condition A        | 3.2.3 Action c     |
|                        |       |   |                          |                    |
| ITS 3.2.4<br>CTS 3.2.4 | M.1   | <p>CTS Action f requires that peaking factors be verified within 24 hours after reaching RTP or within 48 hours after increasing THERMAL POWER. The corresponding ISTS action A.6 requires this verification to be performed within 24 hours after achieving equilibrium conditions at RTP not to exceed 48 hours after increasing THERMAL POWER. The CTS Action is revised to conform to the ISTS. This changes the CTS by requiring the verification to be performed at equilibrium conditions.</p>   | 3.2.4 Action A.6         | 3.2.4 Action f     |
| ITS 3.2.4<br>CTS 3.2.4 | M.2   | <p>CTS Action e (ITS A.5) requires that QPTR be restored to within the limit. CTS Action f (ITS A.6) requires a follow up verification of core status by measuring peaking factors after power has been increased. However, under the general rules of TS usage (CTS 3.0.2) the peaking factor measurements required by CTS Action f (ITS A.6) do not have to be completed if compliance with the LCO is reestablished in CTS Action e (ITS A.5). Therefore, the ISTS 3.2.4 Action A.5 contains a Note that states, "Required Action A.6 must be completed whenever Required Action A.5 is performed." The CTS is revised to</p>  | 3.2.4 Action A.5,<br>A.6 | 3.2.4 Action e & f |

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| ITS #<br>CTS # | DOC # | Description of Change   | ITS Requirement | CTS Requirement |
|----------------|-------|---|-----------------|-----------------|
|                |       | conform to the ISTS. This changes the CTS by the addition of the ISTS Note to CTS Action e. |                 |                 |

Table M  
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Section 3.3A - 3.3.1, Reactor Trip System Instrumentation

| ITS #<br>CTS #           | DOC # | Description of Change  | ITS Requirement        | CTS Requirement        |
|--------------------------|-------|--|------------------------|------------------------|
| ITS 3.3.1<br>CTS 3.3.1.1 | M.1   | CTS Tables 3.3-1 and 4.3-1 list the RTS interlocks in Function 23. The CTS list of interlocks includes P-10 and P-13. The P-10 and P-13 interlocks function to provide the P-7 interlock (low power permissive). Although the CTS references the P-7 permissive in several RTS Functions, the CTS does not specifically list the P-7 interlock in RTS Function 23. The CTS relies on specifying the components of the P-7 interlock (P-10 and P-13) to address the function of P-7. The ISTS list of interlocks includes P-10, P-13, and P-7. The CTS is revised to conform to the ISTS. This changes the CTS by adding a specific RTS line item Function for the P-7 interlock in Tables 3.3-1 and 4.3-1.   | Table 3.3.1-1          | Tables 3.3-1 and 4.3-1 |
| ITS 3.3.1<br>CTS 3.3.1.1 | M.2   | CTS Note 3 in Table 3.3-1 states the following; " With the reactor trip system breakers in the closed position and the control rod drive system capable of rod withdrawal." This CTS Note is used to modify the Applicability of RTS functions needed to mitigate the consequences of rod withdrawal events. The corresponding ISTS Note (a) states; " With Rod Control System capable of rod withdrawal or one or more rods not fully inserted." The CTS is revised to conform to the ISTS. This changes the CTS by adding the requirement to the applicability of whenever one or more rods are not fully inserted.  | Table 3.3.1-1 Note (a) | Table 3.3-1 Note 3     |
| ITS 3.3.1<br>CTS 3.3.1.1 | M.3   | CTS Action 2.a.2, for an inoperable Power Range Neutron Flux Channel, states "place the inoperable channel in trip within 6 hours and perform SR 4.2.4." The referenced SR requires that the Quadrant Power Tilt Ratio be verified within the limit. The corresponding ISTS Action in Condition D specifies the performance of a surveillance to verify QPTR but includes a periodic frequency of "Once per 12 hours" for performing this surveillance. The CTS Action 2.a.2 is revised to conform with the corresponding ISTS Action in Condition D. This changes the CTS by specifying a periodic frequency for performing the required surveillance.  | Action D               | Action 2.a.2           |
| ITS 3.3.1<br>CTS 3.3.1.1 | M.4   | CTS Action 7a requires that "the inoperable channel is placed in the tripped condition within 6 hours". The corresponding ISTS Action Conditions E, K, and L specify the same Action but also includes the requirement that if the channel is not placed in the trip condition the affected unit must be removed from the Applicable Mode associated with the RTS Function. This additional ITS Action is to reduce power to Mode 3 in ITS Condition E, or reduce power to less than P-7 for ITS Condition K, and to reduce power to less than P-9 for ITS Condition L. The CTS is revised to include the ISTS Action requirement to remove the unit from the Applicable Mode for the affected RTS Function. This changes the CTS by including a specific Action to remove the unit from the Applicable Mode of the affected RTS Function if the Action to place the channel in trip is not met. | Actions E, K, & L      | Action 7a              |
| ITS 3.3.1<br>CTS 3.3.1.1 | M.5   | CTS Action 8 applies to the Turbine Trip (Stop Valve Closure) RTS Function. Action 8 requires that "the inoperable channel is placed in the tripped condition within 6 hours". The corresponding ISTS Action Condition L specifies the same Action for this RTS Function but also includes the requirement that if the channel is not placed in the trip condition the affected unit must be removed from the Applicable Mode associated with the RTS Function. The  | Action L               | Action 8               |

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Section 3.3A - 3.3.1, Reactor Trip System Instrumentation

| ITS #<br>CTS #           | DOC # | Description of Change   | ITS Requirement | CTS Requirement |
|--------------------------|-------|---|-----------------|-----------------|
|                          |       | additional ITS Action requires that power be reduced to less than P-9 for ITS Condition L. The CTS is revised to include the ITS Action requirement to remove the unit from the Applicable Mode for the affected RTS Function. This changes the CTS by including a specific Action to remove the unit from the Applicable Mode of the affected RTS Function if the Action to place the channel in trip is not met.  |                 |                 |
| ITS 3.3.1<br>CTS 3.3.1.1 | M.6   | CTS Action 11 applies to the Reactor Coolant Pump (RCP) breaker position RTS Function. Action 11 requires that "the inoperable channel is placed in the tripped condition within 6 hours". The corresponding ISTS Action Condition K specifies the same Action for this RTS Function but also includes the requirement that if the channel is not placed in the trip condition the affected unit must be removed from the Applicable Mode associated with the RTS Function. The additional ITS Action requires that power be reduced to less than P-7 for ITS Condition K. The CTS is revised to include the ITS Action requirement to remove the unit from the Applicable Mode for the affected RTS Function. This changes the CTS by including a specific Action to remove the unit from the Applicable Mode of the affected RTS Function if the Action to place the channel in trip is not met.  | Action K        | Action 11       |
| ITS 3.3.1<br>CTS 3.3.1.1 | M.7   | Unit 2 only (Unit 1 does not have an Action 44). Action 44 is applicable to the Unit 2 RTS Interlock Functions (i.e., P-6, P-8, P-9, etc.). The Unit 2 CTS Action 44 requires that action be taken "With less than the Minimum Number of Channels OPERABLE...." The CTS minimum channels operable requirement for the RTS Interlock Functions is one less than the total number of Interlock channels. As such the CTS does not require any Action when a single interlock channel is inoperable. The corresponding ITS Actions Conditions O and P specify that Action be taken when "one or more channels are inoperable". The ITS Actions are based on the "Required" or total number of channels. As such, the ITS Actions for the RTS interlocks require that action be initiated as soon as a single interlock channel becomes inoperable. The CTS is revised to conform to the ISTS. This changes the CTS by specifying that action be initiated when a single interlock channel becomes inoperable.  | Action O & P    | Action 44       |
| ITS 3.3.1<br>CTS 3.3.1.1 | M.8   | Unit 2 only (Unit 1 does not have an 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 requires that the interlock be determined to be "in its required state for the existing plant condition". The default action requirement if the interlock can not be determined to be in the required state within 1 hour is to apply Specification 3.0.3. Specification 3.0.3 allows 1 hour to prepare for a plant shutdown and then up to 6 hours to be in Mode 3 or 8 hours total from when the channel is first declared inoperable before the shutdown must be complete. The corresponding ITS Action O and P contains different default Actions if the interlock can not be verified to be in the required state. ITS Condition O requires the plant be placed in Mode 3 in a total of 7 hours and is applicable to those interlock Functions that are required operable in Modes 1 and 2. ITS Condition P requires the plant be placed in Mode 2 in a total of 7 hours and is applicable to those interlock Functions required operable in Mode 1. The CTS Action is revised to conform to the ISTS. This changes the CTS Action by including the specific power reduction | Action O & P    | Action 44       |

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Section 3.3A - 3.3.1, Reactor Trip System Instrumentation

| ITS #<br>CTS #           | DOC # | Description of Change  | ITS Requirement    | CTS Requirement    |
|--------------------------|-------|--|--------------------|--------------------|
|                          |       | necessary to remove the plant from the applicable Mode for the affected interlock Function and by reducing the total time allowed to complete the actions by 1 hour.   |                    |                    |
| ITS 3.3.1<br>CTS 3.3.1.1 | M.9   | Unit 1 only (Unit 2 does not use Action 3 or 12 for the RTS Interlock Functions). CTS Action 3 is applicable to the Unit 1 RTS P-6 Interlock Function. CTS Action 12 is applicable to the other RTS interlocks (P-8, P-9, P-10). The CTS Action 3 and 12 require that action be taken "With less than the Minimum Number of Channels OPERABLE...." The CTS minimum channels operable requirement for the RTS Interlock Functions is one less than the total number of Interlock channels. As such the CTS does not require any Action when a single interlock channel is inoperable. The corresponding ITS Action Conditions O and P specify that Action be taken when "one or more channels are inoperable". The ITS Actions are based on the "Required" or total number of channels. As such, the ITS Actions for the RTS interlocks require that action be initiated as soon as a single interlock channel becomes inoperable. The CTS is revised to conform to the ISTS. This changes the CTS by specifying that action be initiated when a single interlock channel becomes inoperable. | Actions O & P      | Action 3 & 12      |
| ITS 3.3.1<br>CTS 3.3.1.1 | M.10  | Unit 1 only (Unit 2 already requires the P-10 interlock in Modes 1 and 2). The CTS Applicability for the P-10 RTS Interlock Function requires the Function to be operable in Mode 1. The ISTS Applicability for the P-10 RTS Function (and the BVPS Unit 2 Applicability) require the P-10 RTS Interlock Function to be operable in Modes 1 and 2. The Unit 1 CTS is revised to conform to the ISTS (and BVPS Unit 2). This changes the CTS by requiring the P-10 RTS Interlock Function on Unit 1 CTS Tables 3.3-1 and 4.3-1 to be operable in Mode 2 as well as Mode 1.  | P-10 Applicability | P-10 Applicability |
| ITS 3.3.1<br>CTS 3.3.1.1 | M.11  | The CTS daily channel calibration surveillance assigned to the power range neutron flux high setpoint on Table 4.3-1 consists of adjusting the power range instrument channels to match the calorimetric heat balance calculation each day. The CTS surveillance is modified by Note 2 that states the surveillance is only required above 15% RTP. The corresponding ISTS SR 3.3.1.2 specifies that the power range channel output be adjusted if calorimetric heat balance calculation results exceed power range channel output by more than + 2% RTP. The ITS surveillance is modified by a Note that states the surveillance is not required to be performed until 24 hours after Thermal Power is $\geq$ 15% RTP. The CTS is revised to be consistent with the ITS. This changes the CTS by adding more specific requirements for the performance of the daily adjustment of the power range channels to the results of the calorimetric heat balance calculation.   | SR 3.3.1.2 Note    | Table 4.3-1 Note 2 |
| ITS 3.3.1<br>CTS 3.3.1.1 | M.12  | The CTS monthly channel calibration requirement associated with the power range neutron flux high setpoint on Table 4.3-1 is modified by Note 3. CTS Note 3 specifies that the surveillance consist of an incore-excore comparison every 31 EFPD above 50% RTP and that the Nuclear Instrumentation System (NIS) be recalibrated (adjusted) if the absolute difference is $\geq$ 3%. The corresponding proposed BVPS ITS surveillance SR 3.3.1.3 contains an addition Note that specifies the first performance of the surveillance must be completed  | SR 3.3.1.3 Note    | Table 4.3-1 Note 3 |

Table M  
More Restrictive Changes  
Section 3.3A - 3.3.1, Reactor Trip System Instrumentation

| ITS #<br>CTS #           | DOC # | Description of Change  | ITS Requirement | CTS Requirement                    |
|--------------------------|-------|--|-----------------|------------------------------------|
|                          |       | within 7 days of exceeding the specified power level. The CTS is revised to conform to the proposed BVPS ITS surveillance requirement. This changes the CTS by placing a new time restriction on the first performance of the surveillance after exceeding the specified power.  |                 |                                    |
| ITS 3.3.1<br>CTS 3.3.1.1 | M.13  | The CTS surveillances for the Power Range Low setpoint and Intermediate Range RTS Functions specified in Table 4.3-1 require a Channel Functional Test (CFT) to be performed Prior to Startup (S/U) if not performed in the previous 31 days (Note 1). The corresponding ISTS surveillance SR 3.3.1.8 (BVPS ITS SR 3.3.1.7) also requires a Channel Operational Test (COT) prior to reactor startup. However, the ISTS Surveillance Frequency is modified by a Note that states the surveillance is only required if it has not been performed in the previous 92 days. The ISTS surveillance also requires the performance of the COT 12 hours after reducing power below P-10 during shutdowns and every 92 days on a periodic basis as long as the plant is maintained in the Applicable Mode. The ISTS surveillance also requires a verification that the P-6 and P-10 interlocks are in their required state for existing plant conditions. The CTS surveillance requirements for these RTS Functions are revised to conform to the ISTS. This changes the CTS requirement to perform the surveillance prior to reactor startup by the addition of requirements to perform the surveillance during a shutdown (within 12 hours after reducing power below P-10) and the addition of the requirement to repeat the surveillance every 92 days on a periodic basis after startup or during a shutdown while maintaining the plant in the Applicable Mode (Mode 2 and Mode 1 < P-7). The ISTS requirement to verify the state of the P-6 and P-10 interlocks are also included in the CTS requirement. | SR 3.3.1.7      | Table 4.3-1 CFT                    |
| ITS 3.3.1<br>CTS 3.3.1.1 | M.14  | The Unit 1 and 2 CTS surveillances for the Power Range High Positive Rate, Overpower and Overtemperature $\Delta T$ RTS Functions and the Unit 2 surveillances for the Pressurizer Pressure - Low RTS Function specified on Table 4.3-1 include the requirement to perform a channel calibration. The corresponding ISTS channel calibration surveillance requirement (ITS SR 3.3.1.10) includes an additional requirement (Note) that affects the RTS Functions listed above. The ISTS channel calibration surveillance requirement includes a Note that requires the verification that time constants are adjusted to the prescribed values. The RTS Functions listed above have time constants associated with their allowable values and trip setpoints. The CTS surveillance requirements are revised to conform to the ISTS. This changes the CTS requirements by including a specific requirement to verify the time constants associated with the RTS Functions listed above.  | SR 3.3.1.10     | Table 4.3-1<br>Channel Calibration |
| ITS 3.3.1<br>CTS 3.3.1.1 | M.15  | The CTS surveillances for the Source Range RTS Function specified on Table 4.3-1 include the requirement to perform a Channel Functional Test (CFT) quarterly. The CTS CFT requirement is modified by Note 8 which states that " Below P-6, not required to be performed for source range instrumentation prior to entering MODE 3 from MODE 2 until 12 hours after entry into MODE 3." The corresponding BVPS proposed ITS surveillance (SR 3.3.1.6) requires that a Channel Operational Test (COT) be performed quarterly. The ISTS surveillance is modified by a note that states "Not required to be performed for source range  | SR 3.3.1.6      | Table 4.3-1 CFT                    |

Table M  
More Restrictive Changes  
Section 3.3A - 3.3.1, Reactor Trip System Instrumentation

| ITS #<br>CTS #           | DOC # | Description of Change   | ITS Requirement                | CTS Requirement              |
|--------------------------|-------|---|--------------------------------|------------------------------|
|                          |       | instrumentation until 12 hours after power has been reduced below P-6." As such, the proposed change revises the CTS by changing the start of the 12 hour time delay allowed for performing the surveillance during shutdowns from after Mode 3 entry to after power is reduced below P-6.  |                                |                              |
| ITS 3.3.1<br>CTS 3.3.1.1 | M.16  | Unit 1 only. The Unit 1 CTS surveillances specified on Table 4.3-1 for the Turbine Trip RTS Functions do not include channel calibrations every refueling cycle. The corresponding ISTS surveillance requirements (SR 3.3.1.10) (and the Unit 2 surveillance requirements) for this RTS Function include a requirement to perform channel calibrations every 18 months. The Unit 1 CTS is revised to conform to the ISTS and Unit 2. This changes the Unit 1 CTS by adding the requirement to perform channel calibrations on the Turbine Trip RTS Functions every 18 months.   | SR 3.3.1.10                    | Table 4.3-1                  |
| ITS 3.3.1<br>CTS 3.3.1.1 | M.17  | Unit 1 only. The Unit 1 CTS surveillance requirements specified on Table 4.3-1 for the manual reactor trip function do not include the Applicable Modes for this RTS Function. In addition, the surveillance requirements specified on Table 4.3-1 for the power range neutron flux - low trip setpoint RTS Function do not include Mode 1 below the P-10 Interlock in the Applicable Modes for this RTS Function. The ISTS includes all the Applicable Modes for each RTS Function in the single combined ISTS Table 3.3.1-1. The CTS is revised to conform to the ISTS. This changes the CTS Table 4.3-1 by combining it with CTS Table 3.3-1 such that each RTS Function has all the associated requirements (including the Applicable Modes as modified by footnotes (a) and (b)) specified on a single Table. The proposed change results in the applicable Modes being correctly and consistently specified each affected Function in the RTS TS. | Table 3.3.1-1<br>Applicability | Table 4.3-1<br>Applicability |
| ITS 3.3.1<br>CTS 3.3.1.1 | M.18  | CTS Table 3.3-1 contains a line item that addresses the requirements for the reactor Trip Breakers (RTBs). CTS Table 3.3-1 does not contain any reference to the RTB bypass breakers. The corresponding ISTS Table 3.3.1-1 contains a footnote (i) that modifies the requirements for the RTBs such that the RTB requirements are applicable to an RTB bypass breaker when the bypass breaker is racked in and closed to bypass an RTB. The CTS is revised to conform to the ISTS. This changes the CTS by providing specific requirements that are applicable to the bypass breakers when they are used in place of the RTBs.  | Table 3.3.1-1                  | Table 3.3-1                  |
| ITS 3.3.1<br>CTS 3.3.1.1 | M.19  | A new ITS surveillance BVPS ITS SR 3.3.1.9 (ISTS 3.3.1.6) is added to the CTS surveillances for the power range neutron flux high trip setpoint on CTS Table 4.3-1. The new surveillance requires that the excore nuclear instrumentation channels be calibrated to agree with incore detector measurements once per refueling cycle. The new surveillance is modified by a note that establishes the criteria for the initial performance following a refueling outage. The note requires that the surveillance be performed within 7 days after thermal power exceeds 50% RTP. The CTS is revised to incorporate this new surveillance requirement.   | SR 3.3.1.9                     | Table 4.3-1                  |

Table M  
 More Restrictive Changes  
 Section 3.3A - 3.3.1, Reactor Trip System Instrumentation

| ITS #<br>CTS #           | DOC # | Description of Change   | ITS Requirement | CTS Requirement      |
|--------------------------|-------|---|-----------------|----------------------|
| ITS 3.3.1<br>CTS 3.3.1.1 | M.20  | CTS Action 40a, applicable to the RTB undervoltage and shunt trip mechanisms, includes the allowance to bypass the RTB in order to perform maintenance on the trip mechanisms. The CTS Action states "Neither breaker shall be bypassed while one of the diverse trip features is inoperable except for the time required for performing maintenance to restore the breaker to OPERABLE status." The ISTS contains a corresponding note (#2) in the Action Condition (ITS Condition N) for an inoperable RTB that states "One RTB may be bypassed for up to 2 hours for maintenance on undervoltage or shunt trip mechanisms, provided the other train is OPERABLE." The CTS allowance is revised to conform to the ISTS note. This changes the CTS allowance by limiting the time the RTB can be bypassed to 2 hours and requiring the other RTB train to be operable. | Action N        | Action 40a           |
| ITS 3.3.1<br>CTS 3.3.1.1 | M.21  | The CTS is revised by the addition of new Applicable Modes and Actions for the Power Range Neutron Flux Low Trip Function. The addition of the new Modes and Actions is consistent with the Westinghouse Owners Group TSTF-453. TSTF-453 was developed to address issues identified in Westinghouse Nuclear Safety Advisory Letter (NSAL)-00-016.   | Table 3.3.1-1   | Tables 3.3-1 & 4.3-1 |

Table M  
More Restrictive Changes  
Section 3.3B - Instrumentation (Other than RTS & ESFAS)

| ITS #<br>CTS #                      | DOC # | Description of Change  | ITS Requirement         | CTS Requirement         |
|-------------------------------------|-------|--|-------------------------|-------------------------|
| ITS 3.3.3<br>CTS 3.3.3.8<br>3.3.3.1 | M.1   | The CTS PAM instrumentation listed on Table 3.3-11 is revised by the addition of new instrumentation consistent with the proposed list of PAM Functions on ITS Table 3.3.3-1. The proposed change enhances the existing CTS requirements by providing a more complete set of PAM indications in the TS. The proposed provides additional assurance that instrumentation necessary to perform PAM functions is maintained operable.   | LCO                     | LCO                     |
| ITS 3.3.3<br>CTS 3.3.3.8<br>3.3.3.1 | M.2   | The "S/U" frequency for the Channel Check on the Auxiliary Feedwater Flow Rate (i.e., the ITS Secondary Heat Sink Indication) PAM Function is revised to an "M" frequency. Additionally, the footnote in Table 4.3-7 that specifies the Auxiliary Feedwater Flow Rate PAM Function Channel Check is to be performed in conjunction with Surveillance Requirement 4.7.1.2.7 following an extended plant outage is deleted. These changes result in a Channel Check being performed on this PAM Function monthly consistent with the Frequency of all other PAM functions.   | Channel Check Frequency | Channel Check Frequency |
| ITS 3.3.3<br>CTS 3.3.3.8<br>3.3.3.1 | M.3   | The N/A frequency for the Channel Check on the Containment Wide-Range Pressure PAM Function is deleted, and a Channel Check will be required to be performed on the Containment Wide-Range Pressure PAM Function consistent with the Channel Check Frequency of the other PAM functions (i.e., monthly).   | Channel Check Frequency | Channel Check Frequency |
| ITS 3.3.3<br>CTS 3.3.3.8<br>3.3.3.1 | M.4   | CTS 3.3.3.1 Action "c" provides an exception to the requirements of Specification 3.0.3. Specification 3.0.3 contains requirements that would become applicable if the CTS did not provide an appropriate Action or the CTS Actions were not met for some reason. Specification 3.0.3 would require that the plant be placed in a Mode where the requirements of CTS 3.3.3.1 were no longer applicable. The PAM ITS does not include an exception to ITS LCO 3.0.3. As such, the proposed change would result in ITS LCO 3.0.3 being applicable if the PAM ITS did not contain an appropriate Action for an inoperable condition or if the ITS Actions were not met.   | Actions                 | Actions                 |
| ITS 3.3.3<br>CTS 3.3.3.8<br>3.3.3.1 | M.5   | CTS Action 35 part "b" contains a requirement that becomes applicable if the Containment Area Radiation Monitor channel(s) are not restored to operable status within the allowed time. The CTS Action requires that an explanation of why the inoperable instrument was not corrected in a timely manner be included in the next Annual Radioactive Effluent Release Report. The corresponding ITS Action if the Containment Area Radiation Monitor channel(s) are not restored to operable status within the specified Completion Time requires immediate compliance with ITS Specification 5.6.5. ITS Specification 5.6.5 states that "a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status." The CTS is revised to conform to the ITS. This changes the CTS by requiring a more timely and complete NRC report be submitted when the Containment Area Radiation Monitor channel(s) are not restored to operable status within the specified Completion Time. | Actions                 | Actions                 |

Table M  
More Restrictive Changes  
Section 3.3B - Instrumentation (Other than RTS & ESFAS)

| ITS #<br>CTS #                      | DOC # | Description of Change   | ITS Requirement | CTS Requirement      |
|-------------------------------------|-------|---|-----------------|----------------------|
| ITS 3.3.3<br>CTS 3.3.3.8<br>3.3.3.1 | M.6   | (Unit 1 only) The CTS PAM requirement for Reactor Vessel Level Indicating System requires one channel operable. The corresponding ITS PAM specifies 2 Reactor Vessel Water Level channels operable. The CTS is revised to conform to the ITS. This changes the CTS to require redundant channels of this PAM Function operable.   | LCO             | LCO                  |
| ITS 3.3.4<br>CTS 3.3.3.5            | M.1   | CTS LCO 3.3.3.5 Actions specify required actions to be conducted within specific times. If the actions cannot be completed within the allowed time, the unit is required "to be in at least HOT SHUTDOWN (i.e., Mode 4) within the next 12 hours." The corresponding Actions of ITS LCO 3.3.4 Condition B state: "Required Action and associated Completion Time not met, be in Mode 3 in 6 hours and Mode 4 in 12 hours." The CTS is revised to conform to the ISTS. This changes the CTS Action by specifying the intermediate requirement that the plant be placed in Mode 3 within 6 hours as well as requiring the plant to be in Mode 4 within 12 hours.  | Action B        | Actions              |
| ITS 3.3.4<br>CTS 3.3.3.5            | M.2   | Not used.   |                 |                      |
| ITS 3.3.4<br>CTS 3.3.3.5            | M.3   | CTS Surveillance Requirement 4.3.3.5 states "Each remote shutdown monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3-6." The CTS Table specifies that a Channel Check for AFW Flow Rate be performed only upon a unit startup (S/U). The S/U frequency for this surveillance is modified by a note that states "Channel check to be performed in conjunction with Surveillance Requirement 4.7.1.2.7 following an extended plant outage." CTS 4.7.1.2.7 verifies AFW flow to the SGs after the Unit has been in Mode 5 or 6 for more than 30 days. The corresponding ITS SR 3.3.4.1 requires the performance of a CHANNEL CHECK every month for each required instrumentation channel that is normally energized. The CTS is revised to conform to the ISTS surveillance requirement. This changes the CTS by replacing the requirement to perform an AFW flow channel check once per unit startup following an extended outage with the requirement for a channel check to be performed every month. | SR 3.3.4.1      | 4.3.3.5, Table 4.3-6 |
| ITS 3.3.4<br>CTS 3.3.3.5            | M.4   | CTS 3.3.3.5 only contains requirements for monitoring instrumentation. CTS surveillance requirement 4.3.3.5 states "Each remote shutdown monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the Channel Check and Channel Calibration operations at the frequencies shown in Table 4.3-6." The CTS requirements only specify a Channel Check and Channel Calibration for the specified monitoring channels. The corresponding ISTS 3.3.4 includes requirements for control and transfer switches as well as monitoring instrumentation. ITS SR 3.3.4.3 provides requirements to verify the operability of the control and transfer switches. ITS SR 3.3.4.3 requires that  | SR 3.3.4.2      | 4.3.3.5              |

Table M  
More Restrictive Changes  
Section 3.3B - Instrumentation (Other than RTS & ESFAS)

| ITS #<br>CTS #   | DOC # | Description of Change  | ITS Requirement | CTS Requirement |
|--|-------|--|-----------------|-----------------|
|  |       | each specified control circuit and transfer switch be verified capable of performing the intended function. The ITS SR must be performed every 36 months. The CTS is revised to conform to the ITS. This changes the CTS by adding specific control and transfer Functions to the Remote Shutdown System specification along with a surveillance requirement to verify the transfer and control switches can perform their intended function.  |                 |                 |
| ITS 3.3.5<br>CTS 3.3.2.1                                 | M.1   | The CTS requires the loss of power instrumentation operable in Modes 1-4. ISTS 3.3.5 requires this instrumentation operable in Modes 1-4 and when the associated DG is required to be operable by LCO 3.8.2, "AC Sources - Shutdown. ITS LCO 3.8.2, AC Sources Shutdown, requires one DG to be operable in Modes 5 and 6 (both units) and when moving irradiated fuel (Unit 1) or recently irradiated fuel (Unit 2). The CTS Applicability for the loss of power instrumentation is revised to conform to the ISTS Applicability. This changes the CTS by requiring the loss of power instrumentation to be operable when the associated DG is required operable by ITS LCO 3.8.2. | Applicability   | Applicability   |
|  |       |  |                 |                 |
| ITS 3.3.6<br>(Unit 2 only)<br>CTS 3.9.9 &<br>CTS 3.3.3.1 | M.1   | Unit 2 only. CTS LCO 3.9.9 Action states "close each of the purge and exhaust penetrations providing direct access from the containment atmosphere to the outside atmosphere." ITS Required Action B.1 states "Place and maintain containment purge and exhaust valves in closed position." The Completion Time for ITS Required Action B.1 is immediate. The CTS is revised to conform to the ITS. This changes the CTS Action by specifying an immediate Completion Time.  | Action B.1      | Action          |
| ITS 3.3.6<br>(Unit 2 only)<br>CTS 3.9.9 &<br>CTS 3.3.3.1 | M.2   | Unit 2 only. CTS 3.3.3.1 Action b states, "With one or more radiation monitoring channels inoperable, take the ACTION shown in Table 3.3-6. CTS Table 3.3-6 specifies Action 22 be taken. CTS Table 3.3-6 Action 22 requires the action specified in CTS 3.9.9 to be applied. The Action in CTS 3.9.9 requires the containment purge and exhaust penetrations to be isolated. The corresponding ITS Action Condition B requires that the containment purge and exhaust penetrations be isolated immediately. The CTS is revised to conform to the ITS. This changes the CTS Action by specifying an immediate Completion Time.   | Action B        | Action b        |
|  |       |  |                 |                 |
| ITS 3.3.7<br>CTS 3.3.3.1                                 | M.1   | CTS 3.3.3.1 Action "a" states, "With a radiation monitoring channel alarm/trip setpoint exceeding the value shown in Table 3.3-6, adjust the setpoint to within the limit within 4 hours or declare the channel inoperable." The CTS Action provides a 4-hour delay before a radiation monitoring channel must be declared inoperable and CTS Action "b" applied. ITS 3.3.7 does not have a corresponding Action that allows a delay before the required channel must be declared inoperable. The CTS Actions are revised to conform to the ISTS   | NA              | Action a        |

Table M  
More Restrictive Changes  
Section 3.3B - Instrumentation (Other than RTS & ESFAS)

| ITS #<br>CTS #           | DOC # | Description of Change  | ITS Requirement | CTS Requirement |
|--------------------------|-------|--|-----------------|-----------------|
|                          |       | Actions. This changes the CTS by eliminating CTS Action "a" which results in radiation monitoring channels being declared inoperable upon discovery instead of 4-hours after discovery.  |                 |                 |
| ITS 3.3.7<br>CTS 3.3.3.1 | M.2   | Unit 2 only. Unit 2 CTS Action 46 applicable when one control room area monitor is inoperable states, "With the number of OPERABLE channels one less than required by the Minimum Channels OPERABLE requirement, either restore the inoperable channel to OPERABLE status within 7 days or close the control room series normal air intake and exhaust isolation dampers." The corresponding ITS 3.3.7 Action Condition A states "One or more Functions with one channel or train inoperable. Place one CREVS train in emergency pressurization mode in 7 days." The CTS is revised to conform to the ITS. This changes the CTS Action by revising the Action to address more actuation instrument functions than just the radiation monitors. In addition, the CTS is revised to not only isolate the control room but place a CREVS train in operation to pressurize the control room with filtered air.   | Action A        | Action 46       |
| ITS 3.3.7<br>CTS 3.3.3.1 | M.3   | Unit 2 only. Unit 2 CTS Action 47 applicable when two radiation monitor channels are inoperable states "With no OPERABLE channels either restore one inoperable channel to OPERABLE status within 1 hour or close the control room series normal air intake and exhaust isolation dampers. The corresponding ITS Action Condition B states "One or more Functions with two channels or two trains inoperable. Place one CREVS train in the emergency pressurization mode immediately. AND Enter applicable Conditions and required Actions of LCO 3.7.10, "CREVS" for one CREVS train made inoperable by inoperable CREVS actuation instrumentation immediately." The CTS is revised to conform to the ITS. This changes the CTS Action by revising the Action to address more actuation instrument functions than just the radiation monitors. The CTS is also revised to not only isolate the control room but place a CREVS train in operation to pressurize the control room with filtered air immediately instead of within one hour. In addition, the CTS is revised to include an Action to enter the applicable plant systems specification (3.7.10) for an inoperable train of CREVS. The Action for an inoperable CREVS train in 3.7.10 allows 7 days of operation in this condition before the CREVS train must be restored to operable status (initiation instrument channel or train restored to operable status) or the plant must be placed in a condition where the affected CREVS train is no longer required operable. | Action B        | Action 47       |
| ITS 3.3.7<br>CTS 3.3.3.1 | M.4   | Unit 2 only. Unit 2 Actions 46 and 47 provide the requirements to be implemented when one or two required instrument channels are inoperable. The CTS Actions do not contain default requirements to follow if the specified Actions are not accomplished within the required time. The corresponding ITS 3.3.7 Actions include default Actions (Conditions C and D) that must be implemented if the Actions in ITS Conditions A and B are not met. The two ITS default Conditions address the different Applicabilities of ITS 3.3.7 (i.e., Modes 1-4 and fuel movement involving recently irradiated fuel). The ITS default Actions require the plant to be removed from the associated Applicability (i.e., be in Mode 5 or   | Actions C & D   | NA              |

Table M  
More Restrictive Changes  
Section 3.3B - Instrumentation (Other than RTS & ESFAS)

| ITS #<br>CTS #           | DOC # | Description of Change   | ITS Requirement     | CTS Requirement |
|--------------------------|-------|---|---------------------|-----------------|
|                          |       | suspend fuel movement involving recently irradiated fuel). The CTS is revised to incorporate the ITS default Action Conditions C and D. This changes the CTS by providing clear Action requirements to implement if the primary Actions that address the inoperable condition are not met within the required completion time.  |                     |                 |
| ITS 3.3.7<br>CTS 3.3.3.1 | M.5   | CTS 3.3.3.1 contains the requirements for radiation monitors, including the monitors used to actuate the Control Room Emergency Ventilation System (CREVS). CTS 3.3.3.1 does not contain requirements for manual initiation of the CREVS. ITS 3.3.7 "CREVS Actuation Instrumentation," contains all the instrumentation requirements for the CREVS including the radiation monitors. ITS 3.3.7 also includes the requirements for the manual switches associated with each CREVS train. The CREVS manual initiation Function is applicable in MODES 1, 2, 3, and 4, and During the movement of recently irradiated fuel assemblies, or during movement of fuel assemblies over recently irradiated fuel assemblies." Two trains of manual initiation are required operable and a TADOT surveillance is assigned to the manual function. The CTS is revised to conform to the ITS. This changes the CTS by adding the requirements for the manual CREVS initiation Function to the TS. | LCO, Actions, & SRs | NA              |
| ITS 3.3.7<br>CTS 3.3.3.1 | M.6   | CTS LCO 3.3.3.1 states "The radiation monitoring instrumentation channels shown in Table 3.3-6 shall be OPERABLE." Table 3.3-6 lists the radiation monitors required for the Control Room Area. ITS LCO 3.3.7 states "The Control Room Emergency Ventilation System (CREVS) actuation instrumentation for each Function in Table 3.3.7-1 shall be OPERABLE." ITS Table 3.3.7-1 lists all the required CREVS instrument functions which includes the containment isolation Phase B (CIB) signal. The ITS Table 3.3.7-1 specification of the CIB actuation includes a reference to the requirements for the CIB being specified in ITS 3.3.2, ESFAS Instrumentation. The CTS is revised to conform to the ISTS. This changes the CTS by specifying an additional instrumentation actuation function for the CREVS.  | Table 3.3.7-1       | Table 3.3-6     |
| ITS 3.3.7<br>CTS 3.3.3.1 | M.7   | CTS LCO 3.3.3.1 Surveillance Requirement 4.3.3.1 states "Each radiation monitoring instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations during the modes and at the frequencies shown in Table 4.3-3." The CTS does not include any requirements for the CREVS manual initiation function. ITS LCO 3.3.7 "Control Room Emergency Ventilation System (CREVS) Actuation Instrumentation," specifies the manual initiation Function and requires SR 3.3.7.3 to be performed on the manual function. The ITS SR requires a TADOT to be performed every 18 months. SR 3.3.7.3 is modified by a Note that states "Verification of setpoint is not required." This changes the CTS by adding a surveillance requirement that is not currently specified.   | SR 3.3.7.3          | NA              |
| ITS 3.3.7<br>CTS 3.3.3.1 | M.8   | Unit 1 only. CTS 3.3.3.1 contains the requirements for the control room radiation monitors. The Unit 1 CTS 3.3.3.1 Action 41 allows Unit 1 to take credit for the Unit 2 control room area radiation monitors when the corresponding Unit 1 control room area radiation   | NA                  | Action 41       |

Table M  
 More Restrictive Changes  
 Section 3.3B - Instrumentation (Other than RTS & ESFAS)

| ITS #<br>CTS #           | DOC # | Description of Change  | ITS Requirement | CTS Requirement |
|--------------------------|-------|--|-----------------|-----------------|
|                          |       | monitors are inoperable. The corresponding Actions in proposed ITS 3.3.7 are simplified and treat each Unit equally and do not contain provisions for Unit 1 to credit the Unit 2 radiation monitors. The CTS is revised to conform to the ITS. The proposed change results in a more simplified set of Actions for Unit 1 that are consistent with the proposed Unit 2 Actions and the corresponding ISTS Actions.  |                 |                 |
| ITS 3.3.7<br>CTS 3.3.3.1 | M.9   | Unit 1 only. CTS 3.3.3.1 contains the Actions applicable when one or more control room area radiation monitors are inoperable. CTS Actions 41a) 2, 41b) 2, and 41b) 3 require that the control room be isolated from the outside atmosphere by closing the series air intake and exhaust isolation dampers. The corresponding ITS 3.3.7 Action Conditions A and B require that a CREVS train be placed in the emergency pressurization mode of operation. The emergency pressurization mode of operation includes isolation of the control room ventilation intake and exhaust ducts as well as the start of a CREVS fan aligned to provide filtered makeup air to pressurize the control room. The CTS Actions are revised to conform to the ITS Actions. This changes the CTS Actions by requiring the control room to be placed in the emergency pressurization mode of operation instead of simply being isolated. | Actions A & B   | Action 41       |
|                          |       |  |                 |                 |
| ITS 3.3.8<br>CTS 3.3.1.1 | M.1   | CTS Action 5, applicable to the Source Range instrumentation, requires that positive reactivity additions be suspended. The corresponding ITS Action A.1 also requires positive reactivity additions to be suspended. However, the ITS Action also requires that actions be suspended immediately. The CTS is revised to conform to the ITS. This changes the CTS by specifying that the Action is required immediately.   | Action A.1      | Action 5        |

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

| ITS #<br>CTS #           | DOC # | Description of Change   | ITS Requirement  | CTS Requirement   |
|--------------------------|-------|---|--|---|
| ITS 3.3.2<br>CTS 3.3.2.1 | M.1   | Unit 2 only. The Unit 2 Turbine Trip and Feedwater Isolation consists of three ESFAS Functions. The requirements for the Safety Injection input are addressed separately under Function 1 in the CTS. However, the operability requirements for the SG Water Level High-High Function and the Automatic Actuation Logic and Relays Function are addressed under the Turbine Trip and Feedwater Isolation Function. The CTS SG Water Level High-High Function is required operable in Modes 1-3 and the CTS Automatic Actuation Logic and Relays Function is only required operable in Modes 1-2. The corresponding ISTS Functions indicate that Mode 3 is optional (bracketed). The CTS is revised to make both these Functions required operable in Mode 3. This changes the CTS by requiring the Automatic Actuation Logic and Relays Function operable in Mode 3 as well as Modes 1-2. | Table 3.3.2-1<br>Turbine Trip and<br>Feedwater<br>Isolation Function | Table 3.3-3 Turbine<br>Trip and Feedwater<br>Isolation Function |
| ITS 3.3.2<br>CTS 3.3.2.1 | M.2   | CTS Action statement 13 applies the trains of Automatic Actuation Logic and requires that with an inoperable channel the plant be placed in Hot Standby (Mode 3) in 12 hours and in Cold Shutdown (Mode 5) within the following 30 hours. The corresponding ISTS Action (Condition C) adds an additional requirement to restore the train to operable status in 6 hours prior to the requirement to be in Mode 3 in 12 hours and Mode 5 in the following 30 hours. The CTS is revised to conform to the ISTS. This changes the CTS by adding a specific Action requirement to restore the affected train to operable status in 6 hours.   | Action C   | Action 13   |
| ITS 3.3.2<br>CTS 3.3.2.1 | M.3   | The CTS Actions require that "the inoperable channel is placed in trip [or in bypass]". The corresponding ISTS Action Conditions specify the same Action but also include the requirement that if the channel is not placed in the trip condition or bypassed the affected unit must be removed from the Applicable Mode associated with the ESFAS Function. The additional ISTS Action requires power and Mode reductions to place the affected unit in a Mode where the ESFAS Function is no longer required operable. The CTS is revised to include the ISTS Action requirement to remove the unit from the Applicable Mode for the affected ESFAS Function. This changes the CTS by including specific Action(s) to remove the unit from the Applicable Mode of the affected ESFAS Function if the Action is not met.   | Actions  | Actions   |
| ITS 3.3.2<br>CTS 3.3.2.1 | M.4   | The CTS Action #16 requires that the inoperable channel be placed in the bypassed condition. The CTS Action does not specify a time in which the channel must be placed in the bypassed condition. The corresponding ITS Action Conditions E and J require that the affected channel be placed in the bypassed condition within 6 hours. The CTS Action is revised to conform to the ITS. This changes the CTS Action by limiting the time operation may continue before the affected channel must be bypassed.   | Actions E & J  | Action 16   |
| ITS 3.3.2<br>CTS 3.3.2.1 | M.5   | CTS Action #38 applies to the ESFAS Interlock Functions and addresses with less than the minimum number of channels operable. In the case of the ESFAS Interlocks, the minimum channels required operable is one less than the total number of channels. Therefore, CTS Action #38 is not applicable until two interlock channels become inoperable. The corresponding ITS Action Condition K is applicable when one or more interlock channels are inoperable. The CTS Action is revised to conform to the ISTS Action. This changes the CTS   | Action K   | Action 38   |

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

| ITS #<br>CTS #           | DOC # | Description of Change  | ITS Requirement  | CTS Requirement     |
|--------------------------|-------|--|------------------|---------------------|
|                          |       | by making the Required Actions applicable when the first interlock channel becomes inoperable instead of waiting until two interlock channels are inoperable.  |                  |                     |
| ITS 3.3.2<br>CTS 3.3.2.1 | M.6   | CTS Action 38 is applicable to the ESFAS Functions (i.e., P-11, and P-12). CTS Action 38 requires that the interlock be determined to be "in its required state for the existing plant condition". The default action requirement if the interlock can not be determined to be in the required state within 1 hour is to apply Specification 3.0.3. Specification 3.0.3 allows 1 hour to prepare for a plant shutdown and then up to 6 hours to be in Mode 3 and another 6 hours to be in Mode 4 or 14 hours total from when the channel is first declared inoperable and the Action is first applicable. The corresponding ITS Action K contains a different default Action if the interlock can not be verified to be in the required state. The ITS Condition requires the plant be placed in Mode 3 in a total of 7 hours and Mode 4 in a total of 13 hours. The CTS Action is revised to conform to the ISTS. This changes the CTS Action by including the specific power reduction necessary to remove the plant from the applicable Mode for the affected interlock Function and by reducing the total time allowed to complete the actions by 1 hour.  | Action K         | Action 38           |
| ITS 3.3.2<br>CTS 3.3.2.1 | M.7   | Not used.  |                  |                     |
| ITS 3.3.2<br>CTS 3.3.2.1 | M.8   | Unit 1 only. The Unit 1 general ESFAS surveillance requirement 4.3.2.1.1 specifies the instrumentation to be tested and the surveillances that must be performed in a similar manner as the corresponding Unit 2 general surveillance requirement. However, unlike Unit 2, the Unit 1 requirement does not specify that interlock, automatic actuation logic, and master and slave relay instrument functions are included in the ESFAS surveillance requirements. The corresponding ISTS ESFAS requirements do not include a general surveillance requirement similar to CTS 4.3.2.1.1. Instead, the ISTS surveillance requirements are specified in detail on Table 3.3.2-1. However, the ISTS ESFAS surveillance requirements, similar to the Unit 2 ESFAS TS, specify that testing be performed on interlock, automatic actuation logic, and master and slave relay instrument functions. The Unit 1 CTS surveillance 4.3.2.1.1 is revised to conform more closely to the corresponding Unit 2 and ISTS ESFAS surveillance requirements. This changes the Unit 1 CTS by adding a more specific surveillance requirement for the interlock, automatic actuation logic, and master and slave relay instrument functions. | Table 3.3.2-1SRs | 4.3.2.1.1           |
| ITS 3.3.2<br>CTS 3.3.2.1 | M.9   | Unit 1 only. The Unit 1 ESFAS Automatic Actuation Logic Functions specified on Table 3.3-3 are revised to include the associated "Actuation Relays". In addition, the Unit 1 surveillance requirements specified on Table 4.3-2 are revised to include the Actuation Relays. This changes the Unit 1 ESFAS requirements by adding specific requirements for SSPS Actuation Relay operability to the ESFAS requirements specified on CTS Table 3.3-3 and 4.3-2.   | Table 3.3.2-1    | Table 3.3-3 & 4.3-2 |
| ITS 3.3.2                | M.10  | Unit 1 only. The CTS requirements for the automatic actuation logic and RWST level   | Table 3.3.2-1    | Table 3.3-3 & 4.3-2 |

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

| ITS #<br>CTS #           | DOC # | Description of Change  | ITS Requirement | CTS Requirement     |
|--------------------------|-------|--|-----------------|---------------------|
| CTS 3.3.2.1              |       | instrumentation for the SI transfer from injection to re-circulation mode Function require this instrumentation to be operable in Modes 1-3. These requirements are specified in both Unit 1 CTS Table 3.3-3 and CTS Table 4.3-2. The corresponding Unit 2 and ISTS instrumentation is required operable in Modes 1-4. The Unit 1 CTS requirements for this instrumentation on both Tables are revised to conform to the ISTS and corresponding Unit 2 TS. This changes the Unit 1 CTS by adding Mode 4 to the Applicability requirements specified on CTS Tables 3.3-3 and 4.3-2 for this instrumentation.  | Applicability   | Applicability       |
| ITS 3.3.2<br>CTS 3.3.2.1 | M.11  | Unit 1 only. The CTS Turbine Trip and Feedwater Isolation ESFAS Function specified on Tables 3.3-3 and 4.3-2 is revised to include requirements for the Automatic Actuation Logic and Actuation Relays and SI Functions. The proposed addition of Automatic Actuation Logic and Actuation Relays and the associated surveillances to the existing requirements for the Turbine Trip and Feedwater Isolation Function make this Unit 1 Function more consistent with the corresponding Unit 2 and ISTS Functions. This changes the Unit 1 ESFAS requirements by adding specific requirements for SSPS Automatic Actuation Logic and Actuation Relays and SI Functions to the ESFAS requirements specified on CTS Table 3.3-3 and 4.3-2 for the Turbine Trip and Feedwater Isolation ESFAS Function. | Table 3.3.2-1   | Table 3.3-3 & 4.3-2 |
| ITS 3.3.2<br>CTS 3.3.2.1 | M.12  | Unit 1 only. The CTS AFW ESFAS Function specified on Tables 3.3-3 and 4.3-2 is revised to include requirements for the Automatic Actuation Logic and Actuation Relays. The proposed addition of Automatic Actuation Logic and Actuation Relays and the associated surveillances to the existing requirements for the AFW Function make this Unit 1 Function more consistent with the corresponding ISTS Functions. This changes the Unit 1 ESFAS requirements by adding specific requirements for SSPS Automatic Actuation Logic and Actuation Relays to the ESFAS requirements specified on CTS Table 3.3-3 and 4.3-2 for the AFW ESFAS Function.   | Table 3.3.2-1   | Table 3.3-3 & 4.3-2 |
| ITS 3.3.2<br>CTS 3.3.2.1 | M.13  | Unit 1 only. The CTS requirements for the AFW pump start on RCP bus undervoltage Function require this instrumentation to be operable in Mode 1. The corresponding Unit 2 and ISTS instrumentation is required operable in Modes 1-2. The Unit 1 CTS requirements for this instrumentation are revised to conform to the ISTS and corresponding Unit 2 TS. This changes the Unit 1 CTS by adding Mode 2 to the Applicability requirements for this instrumentation.  | Table 3.3.2-1   | Table 3.3-3 & 4.3-2 |
| ITS 3.3.2<br>CTS 3.3.2.1 | M.14  | Unit 1 only. The Unit 1 CTS specifies Action 38 for the P-4 interlock. Action 38 requires that the interlock be verified in its required state within 1 hour or Specification 3.0.3 must be applied. Note that Unit 1 Action 38 is the same as Unit 2 Action 38. The corresponding ISTS Action requirement (Condition F) specifies that the inoperable channel or train be restored to operable status within 48 hours or that the plant be placed in Mode 4 in 60 hours. In Mode 4, the P-4 interlock Function is no longer required operable. The Unit 1 Action for the P-4 interlock Function is revised to conform to the corresponding ISTS Action requirements. This changes the Unit 1 Action by requiring the inoperable channel be restored to operable                                   | Action F        | Action 38           |

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

| ITS #<br>CTS #           | DOC # | Description of Change  | ITS Requirement | CTS Requirement              |
|--------------------------|-------|--|-----------------|------------------------------|
|                          |       | status within 48 hours instead of simply verifying the interlock status.   |                 |                              |
| ITS 3.3.2<br>CTS 3.3.2.1 | M.15  | The CTS surveillance requirements for the P-11 and P-12 ESFAS interlock Functions do not include a channel check of the associated instrumentation. The corresponding ISTS surveillance requirements for these ESFAS Functions include a channel check (SR 3.3.2.1). The CTS requirements are revised to conform to the ISTS. This changes the CTS by adding a channel check (SR 3.3.2.1) for the instrumentation associated with the P-11 and P-12 Interlock Functions. | SR 3.3.2.1      | Table 4.3-2, P-11 & P-12 SRs |

Table M  
More Restrictive Changes  
Section 3.4 - Reactor Coolant System

| ITS #<br>CTS #           | DOC # | Description of Change   | ITS Requirement | CTS Requirement          |
|--------------------------|-------|---|-----------------|--------------------------|
| ITS 3.4.1<br>CTS 3.2.5   | M.1   | The CTS footnote 2 to the applicability states that "The provisions of Specification 4.0.4 are not applicable for Reactor Coolant System total flow rate to allow a calorimetric flow measurement and the calibration of the Reactor Coolant System total flow rate indicators." The CTS exception allows entry into Mode 1 without performing the required RCS flow verification surveillance. The ISTS does not contain a note that modifies the applicability of the TS. Instead, the ISTS contains a note that modifies the performance of the surveillance. The ISTS surveillance 3.4.1.4 note states that the surveillance is "Not required to be performed until 24 hours after $\geq$ [90%] RTP." The CTS is revised to more closely conform to the ISTS method of providing the required exception. The CTS footnote to the applicability is revised to state that the heat balance surveillance is "not required to be performed until 7 days after $\geq$ 95% RTP" and is moved into the ITS surveillance 3.4.1.4. This changes the CTS by requiring the surveillance to be performed at a specific time after entering the applicable Mode. | SR 3.4.1.4 Note | Applicability footnote 2 |
|                          |       |   |                 |                          |
| ITS 3.4.2<br>CTS 3.1.1.5 |       | <b>NONE</b>   |                 |                          |
|                          |       |   |                 |                          |
| ITS 3.4.4<br>CTS 3.4.1.1 | M.1   | CTS 3.4.1.1 requires that all the RCS loops be in operation. The corresponding ISTS LCO 3.4.4 requires that all the RCS loops be operable and in operation. The CTS LCO is revised to conform to the ISTS LCO. This changes the CTS by requiring the RCS loops to be operable as well as in operation.  | 3.4.4 LCO       | 3.4.1.1 LCO              |
|                          |       |   |                 |                          |
| ITS 3.4.5<br>CTS 3.4.1.2 | M.1   | The CTS 3.4.1.2 LCO item specifies that two RCS loops be in operation when the rod control system is capable of control bank rod withdrawal. The corresponding ISTS (3.4.5) requires that two RCS loops be operable and that two RCS loops be in operation when the Rod Control System is capable of rod withdrawal. The CTS is revised to conform to the ISTS. This changes the CTS LCO by adding the explicit requirement for two RCS loops to be operable in Mode 3 in addition to the CTS requirement for two loops to be in operation.   | LCO             | LCO                      |
| ITS 3.4.5<br>CTS 3.4.1.2 | M.2   | CTS 3.4.1.2 Action statement a provides Actions for less than the required RCS loops operable and allows up to 72 hours to restore the loop(s) to operable status. CTS Action statement c addresses no RCS loops in operation and specifies immediate Actions to remedy this condition. However, CTS Action statement c does not address inoperable RCS loops. The corresponding ISTS Actions Conditions specify that the Action that allows for a 72 hour restoration time is applicable to the condition of only one required RCS loop inoperable. In addition, the ISTS Action Condition for no RCS loops in operation also provides the Actions for two inoperable RCS loops. The ISTS Condition for two loops not  | Actions         | Action a, c              |

Table M  
More Restrictive Changes  
Section 3.4 - Reactor Coolant System

| ITS #<br>CTS #           | DOC # | Description of Change   | ITS Requirement | CTS Requirement |
|--------------------------|-------|---|-----------------|-----------------|
|                          |       | in operation or inoperable specifies immediate Actions. The CTS Actions are revised to conform to the ISTS Actions. This changes the CTS by limiting the application of the 72 hour restoration Action time to the condition of a single inoperable RCS loop and assigning more immediate Actions to the Condition of 2 inoperable RCS loops.   |                 |                 |
| ITS 3.4.5<br>CTS 3.4.1.2 | M.3   | Not used.   |                 |                 |
| ITS 3.4.5<br>CTS 3.4.1.2 | M.4   | CTS 3.4.1.2.b requires two reactor coolant loops to be OPERABLE with each loop consisting its associated steam generator, and the reactor coolant pump. CTS 3.4.1.2 does not contain any OPERABILITY requirements for the associated steam generator. ISTS SR 3.4.5.2 requires verification that each required steam generator has the required secondary side water level every 12 hours. The CTS is revised to conform to the ISTS. This changes the CTS by adding a surveillance requirement to verify adequate steam generator secondary side level so the steam generator can perform its safety function (heat removal).  | SR 3.4.5.2      | NA              |
| ITS 3.4.6<br>CTS 3.4.1.3 | M.1   | CTS 3.4.1.3, Action a, states that when less than the two required coolant loops are OPERABLE, immediate action must be taken to return the required loops to OPERABLE status as soon as possible and the unit must be in cold shutdown within 20 hours. CTS 3.4.1.3, Action b, states that when no coolant loops are in operation, all operations involving a reduction in boron concentration of the RCS must be suspended and action must be initiated to return the required coolant loop to operation. The corresponding ISTS 3.4.6, Condition A applies when one of the required coolant loops is inoperable and continues to require a transition to Mode 5. ISTS 3.4.6, Condition B, applies when two of the required coolant loops are inoperable or the required loop is not in operation. ISTS Condition B specifies additional immediate Actions for two inoperable loops to prevent boron dilution as well as the CTS Action a requirement to initiate action immediately to restore one coolant loop to operable status. This changes the CTS by revising the actions to be taken if both required coolant loops are inoperable. The ISTS requires additional Actions to prevent a dilution of the RCS boron concentration. | Action A, B     | Action a, b     |
| ITS 3.4.7<br>CTS 3.4.1.3 | M.1   | CTS 3.4.1.3 requires that two coolant loops must be OPERABLE in MODES 4 and 5 and one loop must be in operation. The CTS allows any combination of operable RCS loops and RHR loops and allows for either type of loop to be in operation. The corresponding ISTS 3.4.7 (applicable in Mode 5 only) also requires two operable loops but specifies that one RHR loop must be OPERABLE and in operation. In addition, the remaining required loop must be either the non-operating RHR loop or an RCS loop with the steam generator level within the required limit. The CTS is revised to conform to the ISTS. This changes   | LCO             | LCO             |

Table M  
More Restrictive Changes  
Section 3.4 - Reactor Coolant System

| ITS #<br>CTS #                 | DOC # | Description of Change   | ITS Requirement | CTS Requirement |
|--------------------------------|-------|---|-----------------|-----------------|
|                                |       | the CTS LCO by requiring one RHR loop to be OPERABLE and in operation in MODE 5 when an RCS or RHR loop is allowed by the CTS. In addition, the proposed change further restricts the options for the second required loop. The CTS Action and surveillance are also revised to incorporate the requirements for one RHR loop to be operable and in operation.  |                 |                 |
| ITS 3.4.8<br>CTS 3.4.1.3       | M.1   | CTS 3.4.1.3 Action a specifies the Action for inoperable loops. CTS Action a requires immediate Action to restore the loop(s) to operable status. CTS 3.4.1.3 Action b only addresses no loop in operation. The CTS Action requires immediate Action to restore as well as an Action to preclude dilution of the required boron concentration. The ISTS 3.4.8 Action that corresponds to CTS Action b also applies to the condition of "no required RHR loops operable". The CTS is revised to conform to the ISTS. This changes the CTS LCO by requiring the additional Action to preclude a boron dilution for the condition of "no required RHR loops operable."   | Actions         | Action a, b     |
| ITS 3.4.8<br>CTS 3.4.1.3       | M.2   | CTS 3.4.1.3 footnote (4) provides an allowance for all reactor coolant pumps or RHR pumps to be de-energized for up to one hour per 8 hour period. The corresponding ISTS 3.4.8 Note 1 allows all RHR pumps to be not in operation for $\leq 15$ minutes only when switching from one RHR loop to the other. In addition, the ISTS 3.4.8 Note 1 contains an additional provision (c) that prohibits operations that would reduce the RCS water volume during the time that the RHR pumps are not in operation. The CTS is revised to conform to the ISTS.   | Note 1          | footnote 4      |
| ITS 3.4.17<br>CTS<br>3.4.1.4.1 | M.1   | CTS 3.4.1.4.1 Action a is applicable when an RCS isolation valve is closed. This action requires that the valves be maintained closed and that the plant be placed in Mode 5 to recover the isolated loop. The corresponding ISTS 3.4.17 Action Condition B contains the same requirement to place the plant in Mode 5. However, the ISTS Action is modified by a note that requires the Action to be completed whenever the Condition is entered. The CTS does not contain a similar note that requires that the action be completed whenever it is started. The CTS is revised to conform to the ISTS. This changes the CTS by requiring the Action to be in Mode 5 to be completed whenever it is started. | Action B        | Action a        |
| ITS 3.4.18<br>CTS 3.4.1.5      | M.1   | Not used.   |                 |                 |
| ITS 3.4.18<br>CTS 3.4.1.5      | M.2   | Not used.   |                 |                 |

Table M  
More Restrictive Changes  
Section 3.4 - Reactor Coolant System

| ITS #<br>CTS #            | DOC # | Description of Change   | ITS Requirement | CTS Requirement         |
|---------------------------|-------|---|-----------------|-------------------------|
| ITS 3.4.10<br>CTS 3.4.3   | M.1   | CTS 3.4.3 Action, requires that when one pressurizer safety valve is inoperable, it must be restored to OPERABLE status within 15 minutes or the plant must be placed in hot shutdown within 12 hours. In addition to requiring the plant to be placed in Mode 4 for the same condition, the corresponding ISTS 3.4.10 also requires that the plant must be placed in MODE 3 within 6 hours. The CTS is revised to incorporate this additional Action. This changes the CTS by requiring the unit to be in MODE 3 in 6 hours.   | Actions         | Actions                 |
| ITS 3.4.9<br>CTS 3.4.4    | M.1   | The CTS 3.4.4 Actions when the required pressurizer heater capacity is not met require that the plant be placed in Mode 3 in 6 hours and Mode 4 in the following 12 hours. As such, the CTS allows up to 18 hours to reach Mode 4. The corresponding ISTS Actions (Condition C) allows 6 hours to be in Mode 3 and 12 hours to be in Mode 4 from the start of the shutdown. The CTS Action time to Mode 4 is revised to conform to the ISTS Action time to Mode 4. This changes the CTS by reducing the total time allowed to reach Mode 4 from 18 hours to 12 hours.             | Action C        | Actions                 |
| ITS 3.4.9<br>CTS 3.4.4    | M.2   | CTS 3.4.4 requires that a bubble be maintained in the pressurizer but does not include any surveillance to verify the LCO requirement is being met. The corresponding ISTS requirement is more specific in that it specifies a maximum pressurizer level (discussed in another DOC). The ISTS also contains a surveillance requirement to verify the pressurizer level requirement is met every 12 hours. The CTS is revised to conform to the ISTS. This changes the CTS by adding a surveillance requirement to verify the pressurizer level requirement is met every 12 hours. | SR 3.4.9.1      | NA                      |
| ITS 3.4.20<br>CTS 3.4.5   |       | <b>NONE</b>   |                 |                         |
| ITS 3.4.15<br>CTS 3.4.6.1 | M.1   | CTS Table 4.4-3 contains the surveillance requirements for the RCS leakage detection radiation monitors. The CTS Table contains a # footnote that modifies the channel calibration requirement for the radiation monitors. The CTS footnote states "# Surveillance interval may be extended to the upcoming refueling outage if the interval between refueling outages is greater than 18 months." The corresponding ISTS 3.4.15 does not contain a similar allowance. The CTS is revised to conform to the ISTS. This changes the CTS by deleting the # footnote.                | NA              | Table 4.3-3, # footnote |

Table M  
More Restrictive Changes  
Section 3.4 - Reactor Coolant System

| ITS #<br>CTS #            | DOC # | Description of Change  | ITS Requirement  | CTS Requirement     |
|---------------------------|-------|--|------------------|---------------------|
| ITS 3.4.13<br>CTS 3.4.6.2 |       | <b>NONE</b>  |                  |                     |
| ITS 3.4.14<br>CTS 3.4.6.3 | M.1   | ISTS 3.4.14 Required Action A.1 is modified by a note that requires the following: "Each valve used to satisfy Required Action A.1 must have been verified to meet SR 3.4.14.1." The corresponding CTS Action does not contain this requirement. The CTS is revised to conform to the ISTS. This changes the CTS by requiring that valves used to meet the Required Action must have been previously verified to meet the leakage limits specified in SR 3.4.14.1.   | Action A.1, Note | Action              |
| ITS 3.4.16<br>CTS 3.4.8   | M.1   | CTS Table 4.4-12 item 3 requires that $\bar{E}$ be determined once every 6 months. The corresponding ISTS surveillance SR 3.4.16.3 specifies that $\bar{E}$ be determined once per 184 days within 31 days after a minimum of 2 effective full power days and 20 days of Mode 1 operation have elapsed since the reactor was last subcritical for $\geq 48$ hours. The CTS is revised to be consistent with the ISTS. This changes the CTS by adding the ISTS restrictions to the requirement to determine $\bar{E}$ .   | SR 3.4.16.3      | Table 4.4-12 item 3 |
| ITS 3.4.3<br>CTS 3.4.9.1  | M.1   | CTS 3.4.9.1 requires that the RCS temperature and pressure shall be limited in accordance with the PTLR "during heatup, cooldown, criticality, and inservice leak and hydrostatic testing." CTS 3.4.9.1 is applicable in Modes 1, 2, 3, 4, and 5. The corresponding ISTS 3.4.3 states that the RCS pressure, temperature, and RCS heatup and cooldown rates shall be maintained within the limits specified in the PTLR. ISTS 3.4.3 is applicable "at all times". The CTS is revised to conform to the ISTS. This changes the CTS by eliminating the LCO requirement that the limits must be met during heatup, cooldown, and inservice leak and hydrostatic testing and revising the applicability from Modes 1-5 to "at all times."              | Applicability    | Applicability       |
| ITS 3.4.3<br>CTS 3.4.9.1  | M.2   | CTS 3.4.9.1 Action requires that with any of the pressure or temperature limits exceeded, the temperature and/or pressure must be restored to within the limit within 30 minutes and an engineering evaluation must be performed to determine the effects of the out-of limit condition on the structural integrity of the RCS within 72 hours or be in at least hot standby within the next 6 hours and reduce the RCS $T_{avg}$ and pressure to less than 200°F and 500 psig, respectively, within the following 30 hours. This CTS Action is applicable in Modes 1-5. The corresponding ISTS Actions are divided into Actions applicable in Modes 1-4 and Actions applicable any time in other than Mode 1-4. The ISTS 3.4.3 Action Condition A | Action C         | Actions             |

Table M  
More Restrictive Changes  
Section 3.4 - Reactor Coolant System

| ITS #<br>CTS #                                     | DOC # | Description of Change  | ITS Requirement                | CTS Requirement |
|--|-------|--|--------------------------------|-----------------|
|  |       | and B applicable in Modes 1-4 are similar to the CTS Actions described above. However, the ISTS 3.4.3 Action Condition C, states that with the requirements of the LCO not met any time in other than MODE 1, 2, 3, or 4, initiate immediate action to restore the parameter(s) to within limits and determine the RCS is acceptable for continued operation prior to entering MODE 4. The CTS is revised to conform to the ISTS. This changes the CTS by adopting the new ISTS Action C that requires an immediate action to restore the parameters to within limits when the LCO is not met any time in other than MODE 1, 2, 3, or 4.   |                                |                 |
| ITS 3.4.12<br>CTS 3.4.9.3<br>U1 CTS<br>3.5.4       | M.1   | CTS surveillance 4.4.9.3.3 verifies an RCS vent of the specified size is available when required. The surveillance requires that an open valve with remote position indication be verified open every 31 days. The corresponding ITS surveillance SR 3.4.12.3 only provides the 31-day surveillance interval for valves that are locked or secured in the open position. In the ISTS surveillance, unlocked open vent valves must be verified every 12 hours. The CTS is revised to conform to the ISTS. This changes the CTS by requiring valves with remote position indication that are not locked or secured in the open position to be verified open every 12 hours instead of every 31 days. | SR 3.4.12.3                    | 4.4.9.3.3       |
| ITS 3.4.11<br>CTS 3.4.11                           |       | <b>NONE</b>  |                                |                 |
| ITS 3.4.19<br>U1 CTS<br>3.10.5<br>U2 CTS<br>3.10.4 | M.1   | Applies to Unit 1 only. CTS surveillance 4.10.5.2 specifies in part that a Channel Functional Test be performed on the P-7 interlock function. The corresponding ITS surveillance requirements (SR 3.4.19.2 and SR 3.4.19.3) specify a Channel Operational Test be performed on the P-10 and P-13 interlock functions and an Actuation Logic Test be performed on the P-7 interlock function. This changes the CTS by specifying more specific (defined) surveillance requirements for each function.  | SR 3.4.19.2 and<br>SR 3.4.19.3 | 4.10.5.2        |

Table M  
More Restrictive Changes  
Section 3.5 - Emergency Core Cooling Systems

| ITS #<br>CTS #                                  | DOC # | Description of Change   | ITS Requirement | CTS Requirement |
|---|-------|---|-----------------|-----------------|
| ITS 3.5.1<br>CTS 3.5.1                          |       | <b>NONE</b>   |                 |                 |
| ITS 3.5.2<br>CTS 3.5.2                          | M.1   | CTS 3.5.2 Action a requires, when one ECCS subsystem is inoperable, the ECCS subsystem be restored to OPERABLE status within 72 hours or the unit must be placed in HOT SHUTDOWN within the next 12 hours. In this condition, ITS 3.5.2 Action A requires the ECCS train to be restored to OPERABLE status in 72 hours. ITS 3.5.2 Action B requires the unit to be placed in MODE 3 within 6 hours and MODE 4 within 12 hours if the Required Action and associated Completion Time for ITS 3.5.2 Action A are not met. This changes the CTS by requiring entry into MODE 3 within 6 hours.   | Action B        | Action a        |
| ITS 3.5.2<br>CTS 3.5.2                          | M.2   | Unit 1 only. A new surveillance is added to the Unit 1 TS. The new ITS surveillance (SR 3.5.2.2) requires that the charging pump (i.e., HHSI pump) minimum flow valve (MOV-1CH-373) be verified open with power removed from the valve every 12 hours. The ISTS does not contain a corresponding surveillance requirement. The inclusion of this new Unit 1 requirement is based on the existing Unit 2 CTS requirement for the corresponding Unit 2 valve.   | SR 3.5.2.2      | NA              |
| ITS 3.5.3<br>CTS 3.5.3                          |       | <b>NONE</b>   |                 |                 |
| ITS 3.5.5<br>U2 CTS<br>3.5.4<br>U1 CTS<br>3.5.5 | M.1   | CTS 3.5.4 Action a requires when the seal injection flow is not within limit that the manual seal injection throttle valves are adjusted to restore the limits within 4 hours, or the unit must be placed in HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 12 hours. In this condition, ITS 3.5.5 Action A requires the manual seal throttle valves to be adjusted within 4 hours. ITS 3.5.5 Action B requires the unit to be placed in MODE 3 within 6 hours and MODE 4 within 12 hours if the Required Action and associated Completion Time for ITS 3.5.5 Action A are not met. This changes the CTS by requiring entry into MODE 4 within 12 hours rather than 18 hours. | Action B        | Action a        |
| ITS 3.5.4<br>CTS 3.1.2.8                        |       | <b>NONE</b>   |                 |                 |

Table M  
More Restrictive Changes  
Section 3.6 - Containment Systems

| ITS #<br>CTS #           | DOC # | Description of Change   | ITS Requirement | CTS Requirement |
|--------------------------|-------|---|-----------------|-----------------|
| ITS 3.6.1<br>CTS 3.6.1.1 |       | NONE  |                 |                 |
|                          |       |   |                 |                 |
| ITS 3.6.1<br>CTS 3.6.1.2 |       | NONE  |                 |                 |
|                          |       |   |                 |                 |
| ITS 3.6.2<br>CTS 3.6.1.3 |       | NONE  |                 |                 |
|                          |       |   |                 |                 |
| ITS 3.6.4<br>CTS 3.6.1.4 |       | NONE  |                 |                 |
|                          |       |   |                 |                 |
| ITS 3.6.5<br>CTS 3.6.1.5 |       | NONE  |                 |                 |
|                          |       |   |                 |                 |
| ITS 3.6.1<br>CTS 3.6.1.6 |       | NONE  |                 |                 |
|                          |       |   |                 |                 |
| ITS 3.6.6<br>CTS 3.6.2.1 |       | NONE  |                 |                 |
|                          |       |   |                 |                 |
| ITS 3.6.7<br>CTS 3.6.2.2 | M.1   | Unit 2 only. CTS 3.6.2.2 Action statement a addresses a single inoperable Recirculation Spray System (RSS) subsystem (containing the A or B pump) and allows 72 hours to restore the inoperable subsystem to operable status. CTS Action c addresses the inoperability of a single train of RSS subsystems (pumps A & C or pumps B & D). CTS Action c refers to CTS Action statement a for subsystems containing pumps A and B and refers to the appropriate ECCS Actions of CTS 3.5.2 or 3.5.3 for inoperable subsystems containing pumps C & D. The ECCS Actions that would be applicable to the RSS subsystems containing pumps C and D allow 72 hours to restore an inoperable ECCS train in Modes 1-3 (CTS 3.5.2) similar to CTS 3.6.2.2 Action statement a for RSS subsystems | Actions         | Actions         |

Table M  
More Restrictive Changes  
Section 3.6 - Containment Systems

| ITS #<br>CTS #           | DOC # | Description of Change   | ITS Requirement | CTS Requirement |
|--------------------------|-------|---|-----------------|-----------------|
|                          |       | <p>containing pumps A or B. The ECCS Actions applicable in Mode 4 (CTS 3.5.3) require that an inoperable ECCS train be restored to operable status within one hour. The ISTS does not address the BVPS Unit 2 specific RSS design which shares RSS components between the ECCS system and the RSS. As the BVPS Unit 2 RSS C and D pumps are shared between the RSS and ECCS, the proposed change includes specific RSS Actions that would be applied to inoperable subsystems containing the C and D pumps as well as the ECCS Actions that are currently referenced in the CTS for subsystems containing the C or D pumps. The proposed ITS 3.6.7 Action Condition C (applicable only to Unit 2) addresses any one subsystem inoperable or two subsystems inoperable in the same train. The proposed Condition allows 72 hours to restore the affected subsystem(s) to operable status. This changes the CTS by specifying new inclusive Actions for all the Unit 2 subsystems in the RSS TS instead of relying solely on the ECCS TS Actions for subsystems containing the C and D pumps.</p> |                 |                 |
| ITS 3.6.7<br>CTS 3.6.2.2 | M.2   | <p>The CTS 3.6.2.2 RSS Actions are revised by the addition of a new Action Condition consistent with the ISTS. The addition of ITS Action Condition E provides an Action for the Condition of three inoperable subsystems and requires immediate entry into LCO 3.0.3. The CTS is revised to conform to the ISTS Action Conditions. This changes the CTS by adding a specific requirement to enter LCO 3.0.3 when three RSS subsystems are inoperable.</p>  | Action E        | NA              |
| ITS 3.6.8<br>CTS 3.6.2.3 | M.1   | <p>The CTS 3.6.2.3 Action contains the default requirement if a chemical addition subsystem is not restored to operable status. The CTS default Action requires that the plant be in HOT STANDBY within the next 6 hours; restore the inoperable spray subsystem to OPERABLE status within the next 48 hours or be in COLD SHUTDOWN within the next 36 hours. The CTS default Action allows a total time of 90 hours to reach Mode 5 (6 + 48 + 36 = 90). The corresponding ISTS Action (ITS 3.6.8 Condition B) simply specifies be in Mode 3 in 6 hours and be in Mode 5 in 84 hours. The ITS Action provides a total of 84 hours to reach Mode 5. The CTS is revised to conform to the ISTS. This changes the CTS Action by simplifying the required Actions and reducing the total time to reach Mode 5 from 90 hours to 84 hours.</p>  | Action B        | Actions         |
| ITS 3.6.3<br>CTS 3.6.3.1 |       | <b>NONE</b>   |                 |                 |

Table M  
More Restrictive Changes  
Section 3.7 - Plant Systems

| ITS #<br>CTS #           | DOC # | Description of Change   | ITS Requirement | CTS Requirement   |
|--------------------------|-------|---|-----------------|-------------------|
| ITS 3.7.1<br>CTS 3.7.1.1 |       | <b>NONE</b>   |                 |                   |
|                          |       |   |                 |                   |
| ITS 3.7.5<br>CTS 3.7.1.2 | M.1   | Not used.   |                 |                   |
| ITS 3.7.5<br>CTS 3.7.1.2 | M.2   | CTS surveillance 4.7.1.2.7 is revised by CTS Note 7 that states: "This surveillance is required to be performed prior to entry into MODE 2 whenever the plant has been in MODES 5 or 6 for greater than 30 continuous days." The corresponding ISTS surveillance contains a similar frequency for performance with the exception that the ISTS specifies that the surveillance is applicable after the plant has been in a "defueled" condition as well as in Modes 5 and 6. The CTS is revised to conform to the ISTS. This changes the CTS by expanding the operating conditions for which the cumulative time is tracked by CTS surveillance 4.7.1.2.7. As such, the proposed change requires the time spent in a defueled condition be accounted for as well as the time spent in Modes 5 and 6 for determining when surveillance 4.7.1.2.7 must be performed.                                      | SR 3.7.5.5      | 4.7.1.2.7, Note 7 |
|                          |       |   |                 |                   |
| ITS 3.7.6<br>CTS 3.7.1.3 | M.1   | CTS 3.7.1.3 specifies requirements for the PPDWST that are applicable in MODES 1, 2, and 3. ITS 3.7.6 specifies requirements are applicable in MODES 1, 2, 3, and MODE 4 when a steam generator is relied upon for heat removal. The CTS has been revised to incorporate the additional Mode of Applicability for "MODE 4 when a steam generator is relied upon for heat removal." Consistent with this change in the Mode of Applicability, the phrase "Be in MODE 4, without reliance on steam generator for heat removal" is added as specified in ITS 3.7.6 Required Action B.2. This changes the CTS requirements by requiring the PPDWST to be Operable in MODE 4 when a steam generator is relied upon for heat removal.   | Applicability   | Applicability     |
| ITS 3.7.6<br>CTS 3.7.1.3 | M.2   | CTS 3.7.1.3 Action b allows 4 hours to demonstrate Operability of the reactor plant river water system (Unit 1) or the service water system (Unit 2) as a backup water supply to the auxiliary feedwater pumps whenever the PPDWST is inoperable. ITS 3.7.6 Required Action A.1 allows 4 hours to verify by administrative means the Operability of the backup water supply and requires a verification of the backup water supply be performed every 12 hours thereafter whenever the PPDWST is inoperable. This changes the CTS by requiring the plant to perform verifications every 12 hours of the backup water supply Operability. The verifications follow the initial 4 hour verification and continues through the 7 days the PPDWST is allowed to be inoperable. The CTS has been revised to incorporate the additional Completion Time for the backup water supply Operability verification. | Action A.1      | Action b          |

Table M  
More Restrictive Changes  
Section 3.7 - Plant Systems

| ITS #<br>CTS #            | DOC # | Description of Change  | ITS Requirement | CTS Requirement       |
|---------------------------|-------|--|-----------------|-----------------------|
| ITS 3.7.6<br>CTS 3.7.1.3  | M.3   | CTS 3.7.1.3 Action b states that if demonstration of the Operability of the backup water supply is not satisfied and if the PPDWST is not restored to Operable status within 7 days, the plant must be in HOT SHUTDOWN within the next 12 hours. ITS 3.7.6 Condition B states that if verification of the Operability of the backup water supply is not satisfied or an inoperable PPDWST is not restored to OPERABLE status within 7 days, the plant must be in MODE 3 within 6 hours and MODE 4 without reliance on the steam generators for heat removal within 24 hours. This changes the CTS to require the plant to be in MODE 3 within six hours prior to satisfying the MODE 4 requirement. The CTS has been revised to incorporate the additional MODE step requirement.  | Action B        | Action b              |
| ITS 3.7.13<br>CTS 3.7.1.4 | M.1   | CTS Table 4.7-2 Item #2 allows the sampling frequency for the DOSE EQUIVALENT I-131 to be extended to once per 6 months whenever the gross activity determination indicates the iodine concentrations are below 10% of the allowable limits. ISTS SR 3.7.18.1 (ITS SR 3.7.13.1) does not provide for this extended time frame for determining the DOSE EQUIVALENT I-131 and requires verification of specific activity of the secondary coolant every 31 days whenever the unit is in MODES 1, 2, 3, and 4. The CTS surveillance is revised to conform to the ISTS fixed surveillance frequency of 31 days for determining DOSE EQUIVALENT I-131. This changes the CTS by revising the specified frequency for determining DOSE EQUIVALENT I-131 to 31 days instead of referencing the program specified on CTS Table 4.7-2. The proposed change also eliminates the need for CTS Table 4.7-2. | NA              | Table 4.7-2, Item # 2 |
| ITS 3.7.2<br>CTS 3.7.1.5  | M.1   | CTS 3.7.1.5 Action for MODE 1 requires that when one MSIV is inoperable, the valve is to be restored to OPERABLE status within 4 hours or the unit is to be in HOT SHUTDOWN (MODE 4) within the next 12 hours. ITS Action A allows 8 hours to restore an inoperable MSIV to OPERABLE status when in MODE 1, and an additional 6 hours to be in MODE 2. The total CTS Completion Time from MSIV inoperability to exiting MODE 1 is 16 hours. The total ITS Completion Time from MSIV inoperability to exiting MODE 1 is 14 hours. This reduces the CTS Completion Time to restore an inoperable MSIV by 2 hours (16 hours versus 14 hours).   | Actions         | Actions               |
| ITS 3.7.2<br>CTS 3.7.1.5  | M.2   | CTS 3.7.1.5 Actions for MODES 2, and 3 states subsequent operation in MODES 2 or 3 may proceed provided the inoperable MSIV is maintained closed. The CTS does not require further verification of the MSIV position after it is closed. If the valve is not maintained closed, the unit must be in HOT SHUTDOWN (MODE 4) within the next 12 hours. The CTS does not include a specific time in which the unit must be placed in Mode 3. Thus, the CTS would allow continued operation in Modes 2 and 3 with an open and inoperable MSIV for up to 12 hours before Mode 4 must be entered. The CTS Action does   | Actions         | Actions               |

Table M  
More Restrictive Changes  
Section 3.7 - Plant Systems

| ITS #<br>CTS #           | DOC # | Description of Change  | ITS Requirement | CTS Requirement |
|--------------------------|-------|--|-----------------|-----------------|
|                          |       | not require the inoperable MSIV be closed prior to the 12 hours allowed to transition into Mode 4. Since in Mode 4 the MSIV is not required operable, the CTS does not require the MSIV to be closed. The corresponding ITS 3.7.2 Required Actions C.1 requires an inoperable MSIV to be closed within 8 hours and Required Action C.2 requires the valve to be verified closed once per 7 days. Thus, the ITS limits operation with an open inoperable MSIV to 8 hours. Additionally, the ISTS requires a continuous check of the valve position to verify that it is closed while operating in Modes 2 or 3 (which is not required by the CTS). As long as the requirements of C.1 and C.2 are met, the ISTS permits continued operation in Modes 2 and 3. Otherwise, ISTS Condition D requires the unit to be placed in MODE 3 within 6 hours and MODE 4 within 12 hours. The CTS is revised to conform to the ISTS. This changes the CTS by specifying a time within which an inoperable MSIV must be closed (8 hours) and requiring periodic verification that the inoperable MSIV is closed. In addition, the CTS has been changed to add a specific time the unit is required to be in MODE 3 (within 6 hours). |                 |                 |
| ITS 3.7.2<br>CTS 3.7.1.5 | M.3   | The CTS does not require testing to verify that the MSIVs close on an actuation signal. ITS SR 3.7.2.2 requires verification that each MSIV actuates to the isolation position on an actual or simulated actuation signal. This changes the CTS by requiring verification that each MSIV actuates to the isolation position on an actual or simulated actuation signal.  | SR 3.7.2.2      | NA              |
| ITS 3.7.3<br>CTS NA      | M.1   | CTS does not have any requirement for main feedwater isolation valves (MFIVs), main feedwater regulating valves (MFRVs), and associated bypass valves to be OPERABLE, other than a requirement for an actuation signal to be supplied to the valves in CTS 3.3.2.1. ITS 3.7.3 requires the MFIVs, MFRVs, and associated bypass valves be OPERABLE in MODES 1, 2, and 3. This changes the CTS by incorporating the requirements of ITS 3.7.3.   | 3.7.3           | NA              |
| ITS 3.7.7<br>CTS 3.7.3.1 | M.1   | CTS 3.7.3.1 Action currently contains no requirement to enter applicable Actions of CTS 3.4.1.3, "RCS Loops and Coolant Circulation – Shutdown" for RHR loops made inoperable by CCW. ITS 3.7.7 Required Action A.1 Note provides this requirement. The CTS is revised to conform to the ITS. This changes the CTS by adding a note to the CTS Actions requiring entry into the applicable Conditions and Required Actions of LCO 3.4.6, "RCS Loops - Mode 4" for RHR loops made inoperable by CCW.  | Action Note     | Actions         |
| ITS 3.7.8<br>CTS 3.7.4.1 | M.1   | CTS 3.7.4.1 Action currently contains no requirement to enter applicable Actions of CTS 3.4.1.3, "RCS Loops and Coolant Circulation – Shutdown" for RHR loops made inoperable by SWS or CTS 3.8.1.1, "A. C. Sources" for emergency diesel generator made inoperable  | Action A.1 Note | NA              |

Table M  
More Restrictive Changes  
Section 3.7 - Plant Systems

| ITS #<br>CTS #   | DOC # | Description of Change   | ITS Requirement         | CTS Requirement |
|--|-------|---|-------------------------|-----------------|
|  |       | by SWS. ITS 3.7.8 Required Action A.1 Note provides this requirement. The CTS is revised to conform to the ISTS. This changes the CTS by adding a note to the CTS Actions requiring entry into the applicable Conditions and Required Actions of LCO 3.4.6, "RCS Loops - Mode 4" for RHR loops made inoperable by SWS and LCO 3.8.1, "A. C. Sources – Operating" for an emergency diesel generator made inoperable by SWS.  |                         |                 |
| ITS 3.7.8<br>CTS 3.7.4.1                                 | M.2   | CTS 4.7.4.1.c requires the cycling of power operated valves in the SWS flow path servicing safety related equipment that is not testable during plant operation once per 18 months during shutdown. ITS SR 3.7.8.2 requires every 18 months the verification that each SWS automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal. ITS SR 3.7.8.3 requires every 18 months the verification that each SWS pump starts automatically on an actual or simulated actuation signal. The CTS has been revised to incorporate the new ISTS surveillance requirements. | SR 3.7.8.2 & SR 3.7.8.3 | 4.7.4.1.c       |
|  |       |   |                         |                 |
| ITS 3.7.9<br>CTS 3.7.5.1                                 |       | <b>NONE</b>   |                         |                 |
|  |       |   |                         |                 |
| ITS 3.7.4<br>CTS NA                                      | M.1   | The BVPS CTS does not contain any requirements for the steam generator (SG) atmospheric dump valve (ADV) lines. Currently BVPS controls the operability of the ADV lines outside of the Technical Specifications. ISTS 3.7.4 specifies requirements for the ADV lines. The CTS is revised by adopting a BVPS specific version of ISTS 3.7.4. This changes the CTS by incorporating new Technical Specification requirements for the SG ADV lines based on ISTS 3.7.4.   | 3.7.4                   | NA              |
|  |       |   |                         |                 |
| ITS 3.7.11<br>CTS 3.7.6                                  |       | <b>NONE</b>   |                         |                 |
|  |       |   |                         |                 |
| ITS 3.7.10<br>CTS 3.7.7.1<br>(U1) &<br>CTS 3.7.7<br>(U2) |       | <b>NONE</b>   |                         |                 |
|  |       |   |                         |                 |

Table M  
More Restrictive Changes  
Section 3.7 - Plant Systems

| ITS #<br>CTS #   | DOC # | Description of Change  | ITS Requirement | CTS Requirement |
|--|-------|--|-----------------|-----------------|
| ITS NA<br>CTS 3.7.8.1                                  |       | <b>NONE</b>  |                 |                 |
| ITS 3.7.12<br>CTS 3.9.12                               | M.1   | Unit 2 only. The Unit 2 CTS requirements for SLCRS do not include a requirement to verify the fuel building integrity by verifying that the required SLCRS can maintain a negative pressure in the fuel building. The proposed ITS 3.7.12 includes a surveillance requirement (SR 3.7.12.3) to verify a SLCRS train can maintain the Unit 2 fuel building at a negative pressure. The proposed new surveillance contains a note that clarifies the surveillance is only applicable for fuel movement involving recently irradiated fuel in the fuel storage pool. The Note is necessary as the Unit 1 SLCRS is also required operable for fuel movement involving recently irradiated fuel inside containment. The new surveillance is only for the fuel building integrity and would not be appropriate if the Unit 1 SLCRS was only required for fuel movement inside containment. The containment penetration refueling requirements are addresses in ITS 3.9.3 of the technical specifications. The note does not affect the Unit 2 surveillance as the Unit 2 SLCRS is only required for fuel movement in the fuel building. Thus, the Unit 2 CTS is revised by the addition of a new surveillance requirement. | SR 3.7.12.3     | NA              |
| ITS 3.7.15<br>CTS 3.9.11                               | M.1   | CTS 3.9.11 specifies the minimum spent fuel storage pool water level. If the required water level is not met the CTS 3.9.11 Action specifies that the movement of irradiated fuel assemblies and fuel assemblies over irradiated fuel assemblies be suspended. The corresponding ITS 3.7.15 Required Action is the same except that the ITS Action requires an "immediate" suspension of the specified fuel movement. The CTS Action is revised to be consistent with the ITS Action. This changes the CTS by adding the requirement that movement be suspended immediately.   | Action          | Action          |
| ITS 3.7.14<br>CTS 3.9.14                               |       | <b>NONE</b>  |                 |                 |
| ITS 3.7.16<br>CTS 3.9.14<br>(U1)<br>CTS 3.9.15<br>(U2) | M.1   | Action b of CTS 3.9.14 (Unit 1 only) does not require the initiation of action to restore fuel storage pool boron concentration to within limit whenever the limit is not met. ITS 3.7.16 requires the immediate initiation of action to restore fuel storage pool boron concentration to within limit whenever the limit is not met. This changes the CTS by adding a specific requirement to restore the boron concentration parameter.  | Actions         | Action b        |

Table M  
 More Restrictive Changes  
 Section 3.7 - Plant Systems

| ITS #<br>CTS #                                   | DOC # | Description of Change   | ITS Requirement     | CTS Requirement     |
|--|-------|---|---------------------|---------------------|
| ITS 3.7.16<br>CTS 3.9.14 (U1)<br>CTS 3.9.15 (U2) | M.2   | Unit 1 only. CTS 3.9.14 LCO requires that the specified boron concentration be maintained in the spent fuel pool when moving fuel in the spent fuel pool. The CTS 3.9.14 Applicability states during storage of fuel in the spent fuel pool. The Applicability of the corresponding ITS 3.7.16 requires the specified boron concentration be maintained in the fuel storage pool when fuel assemblies are stored in the fuel storage pool and a fuel storage pool verification has not been performed since the last movement of fuel assemblies in the fuel storage pool. ITS 3.7.16 also includes a new Action to perform a fuel storage pool verification in addition to the CTS requirement to stop moving fuel. The Unit 1 CTS is revised to conform to the ISTS requirements. | LCO & Applicability | LCO & Applicability |

Table M  
More Restrictive Changes  
Section 3.8 - Electrical Power Systems

| ITS #<br>CTS #                     | DOC # | Description of Change   | ITS Requirement       | CTS Requirement |
|------------------------------------|-------|---|-----------------------|-----------------|
| ITS 3.8.1 ITS 3.8.3<br>CTS 3.8.1.1 | M.1   | Unit 1 CTS LCO 3.8.1.1 and surveillances do not contain any requirements for DG lubricating oil. ITS LCO 3.8.3 states the stored diesel lube subsystem shall be within limits for each required DG. ITS Condition B allows less than the 7-day supply of lube oil for 48 hours. ITS SR 3.8.3.2 requires verification that the lubricating oil inventory is $\geq$ the specified volume every 31 days. This changes the Unit 1 CTS by adding requirements to maintain a DG lube oil inventory (ITS 3.8.3 LCO, Action and Surveillance).  | LCO 3.8.3, SR 3.8.3.2 | NA              |
| ITS 3.8.1 ITS 3.8.3<br>CTS 3.8.1.1 | M.2   | Unit 1 CTS surveillance requirement 4.8.1.1.2.a.6 states that the generator is capable of being synchronized to the bus, loaded to $\geq 1425$ kW, and operated for $\geq 60$ minutes. ITS SR 3.8.1.3 states that the DG is capable of being synchronized to the bus, operated for $\geq 60$ minutes at a load of $\geq 2340$ kW and $\leq 2600$ kW. This changes the CTS loading requirement for the DG to a greater value.  | SR 3.8.1.3            | 4.8.1.1.2.a.6   |
| ITS 3.8.1 ITS 3.8.3<br>CTS 3.8.1.1 | M.3   | Not used.   |                       |                 |
| ITS 3.8.1 ITS 3.8.3<br>CTS 3.8.1.1 | M.4   | <b>CTS surveillance requirement 4.8.1.1.2.b.5 requires each diesel to be tested every 18 months during shutdown to a specific kW load for <math>\geq 60</math> minutes. The required loading for Unit 1 is 2750 kW and for Unit 2 the load is 4238 kW. ITS SR 3.8.1.10 requires that each DG be run for <math>\geq 8</math> hours loaded to within specific kW load bands. Unit 1 is required to run for <math>\geq 2</math> hours at a load of <math>\geq 2750</math> kW and <math>\leq 2850</math> kW. Unit 2 is required to run for <math>\geq 2</math> hours at a load of <math>\geq 4238</math> kW and <math>\leq 4535</math> kW. The ITS SR requires the DGs of both units to be run for the remainder of the 8 hour requirement within a load band equivalent to the continuous duty rating of the DGs (<math>\geq 2340</math> kW and <math>\leq 2600</math> kW for Unit 1 and <math>\geq 3814</math> kW and <math>\leq 4238</math> kW for Unit 2). Three notes modify the SR. Notes 1 and 2 are addressed by a less restrictive discussion of change. Note 3 states if the SR is performed with the DG synchronized with offsite power, it shall be performed at a power factor of <math>\leq 0.89</math>. Additionally, the note states that if grid conditions do not permit, the power factor limit is not required to be met. The note goes on to state that under this condition, the power factor shall be maintained as close to the limit as possible. This DOC addresses the changes to the CTS of the 8 hour run time with specific loading bands, and the specification of a power factor limit for each DG.</b> | SR 3.8.1.10           | 4.8.1.1.2.b.5   |
| ITS 3.8.1 ITS 3.8.3<br>CTS 3.8.1.1 | M.5   | Not used.   |                       |                 |
| ITS 3.8.1 ITS 3.8.3                | M.6   | Not used.   |                       |                 |

Table M  
More Restrictive Changes  
Section 3.8 - Electrical Power Systems

| ITS #<br>CTS #                        | DOC # | Description of Change  | ITS Requirement | CTS Requirement |
|---------------------------------------|-------|--|-----------------|-----------------|
| CTS 3.8.1.1                           |       |  |                 |                 |
| ITS 3.8.1 ITS<br>3.8.3<br>CTS 3.8.1.1 | M.7   | Not used.  |                 |                 |
| ITS 3.8.1 ITS<br>3.8.3<br>CTS 3.8.1.1 | M.8   | Not used.  |                 |                 |
| ITS 3.8.1 ITS<br>3.8.3<br>CTS 3.8.1.1 | M.9   | CTS surveillance requirements for LCO 3.8.1.1 do not require a test of the diesel generator capability to carry emergency loads, transfer those loads to offsite source upon a simulated restoration of the offsite power, transfer loads to offsite power source, and return to the specified position. ITS SR 3.8.1.11 requires verification for each DG that it is capable of synchronizing with the offsite power source while carrying emergency loads. Upon a simulated restoration of offsite power, the emergency loads would be transferred to the offsite source and the DG would return to a specified condition. The Unit 2 DGs would return to a ready-to-load position and the Unit 1 DGs would be required to proceed through the shutdown sequence. The surveillance is required to be performed every 18 months. A note modifies the SR. The note states this surveillance shall not normally be performed in MODE 1, 2, 3, and 4. The note allows the performance of the SR in MODES 1, 2, 3, and 4 to reestablish OPERABILITY for the DG provides an assessment can determine that the safety of the plant can be maintained or enhanced. This changes the CTS by requiring each DG demonstrate the described requirements every 18 months. | SR 3.8.1.11     | NA              |
| ITS 3.8.1 ITS<br>3.8.3<br>CTS 3.8.1.1 | M.10  | Unit 2 CTS surveillance requirements for LCO 3.8.1.1 do not require a diesel generator, while operating in a test mode and connected to its emergency bus, to override the test mode, return the DG to a ready-to-load. ITS SR 3.8.1.12 requires verification that with a DG operating in a test mode and connected to its bus, an actual or simulated ESF actuation signal overrides the test mode. The actual or simulated signal would cause the DG to return to the ready-to-load condition. The surveillance is required to be performed every 18 months. Two notes modify the SR. Note 1 states that the SR is only applicable to Unit 2 only. The second note states this surveillance shall not normally be performed in MODE 1, 2, 3, and 4. The note allows portions of the SR to be performed in MODES 1, 2, 3, and 4 to reestablish OPERABILITY for the DG provides an assessment can determine that the safety of the plant can be maintained or enhanced. This changes the CTS by requiring each Unit 2 DG to demonstrate the described requirements every 18 months.  | SR 3.8.1.12     | NA              |
| ITS 3.8.1 ITS<br>3.8.3<br>CTS 3.8.1.1 | M.11  | CTS SR 4.8.1.1.2.b.2 requires the verification of the diesel generator capability to reject a load. This surveillance is required to be performed every 18 months during shutdown. ITS SR 3.8.1.8 contains the requirement to verify that a DG has the capability to reject its associated single largest post-accident load. Two notes modify the SR. Note 1 is   | SR 3.8.1.8      | 4.8.1.1.2.b.2   |

Table M  
More Restrictive Changes  
Section 3.8 - Electrical Power Systems

| ITS #<br>CTS #                     | DOC # | Description of Change   | ITS Requirement                 | CTS Requirement |
|------------------------------------|-------|---|---------------------------------|-----------------|
|                                    |       | addressed in a less restrictive change. Note 2 requires the performance of the SR with the DG synchronized with offsite power with a power factor of $\leq 0.89$ . The note allows, if grid conditions do not permit, the power factor limit to not be met, be maintained as close as possible to the limit. This changes the CTS by requiring the performance of the SR with a power factor limit.   |                                 |                 |
| ITS 3.8.1 ITS 3.8.3<br>CTS 3.8.1.1 | M.12  | CTS surveillance requirement 4.8.1.1.2.a.6 requires the verification that the generator is synchronized, loaded to the bus at a specific kW rating, and operated for 60 minutes or longer. ITS SR 3.8.1.3 requires the verification that each DG is synchronized and load and operates for $\geq 60$ minutes within a given load band. Four notes modify the SR. Note 1 is addressed by an administrative change and note 2 is addressed by a less restrictive change. Note 3 states that the surveillance shall be conducted on only one DG at a time. Note 4 requires the SR shall be preceded by and immediately follow without shutdown a successful performance of SR 3.8.1.2. This changes the CTS by allowing only one DG at a time to be tested and the loading of the DG shall only be conducted after specific start requirements.  | SR 3.8.1.3                      | 4.8.1.1.2.a.6   |
| ITS 3.8.1 ITS 3.8.3<br>CTS 3.8.1.1 | M.13  | CTS surveillance 4.8.1.1.2.c.1 requires the diesel generator day tank to be checked for water and the accumulated water removed. The corresponding ITS SR 3.8.1.5.1 requires both the day and engine mounted tanks to be checked for water and accumulated water removed. This changes the CTS by adding the requirement to check for and remove accumulated water from the engine mounted tank.  | SR 3.8.1.5.1                    | 4.8.1.1.2.c.1   |
| ITS 3.8.1 ITS 3.8.3<br>CTS 3.8.1.1 | M.14  | CTS 3.8.1.1 does not require specific limits or requirements for the starting air system for DG OPERABILITY. ITS LCO 3.8.3 adds a requirement for starting air system to be OPERABLE when an associated DG is required to be OPERABLE. ITS 3.8.3 Condition E is added and specifies the appropriate Action for the air start system when the air pressure is not within the limit. ITS SR 3.8.3.4 is added and requires the verification of each DG air start receiver pressure is $\geq$ the required limit every 31 days. This changes the CTS by adding the appropriate requirements for starting air system to ensure DG OPERABILITY.   | LCO 3.8.3, Action E, SR 3.8.3.4 | NA              |
| ITS 3.8.1 ITS 3.8.3<br>CTS 3.8.1.1 | M.15  | CTS surveillance requirement 4.8.1.1.2.b.2 requires a verification that the generator (DG) is capable of rejecting a load $\geq 825$ kw without tripping and without exceeding 64.4 Hz for Unit 2. Unit 1 surveillance requirement states; verify the generator capability to reject a load of $\geq 615$ kw without tripping and without exceeding 66.2 Hz. ITS SR 3.8.1.8 states Verify each DG rejects a load greater than or equal to its associated single largest post-accident load, and following load rejection, the frequency is $\leq 66.2$ Hz (Unit 1) or $\leq 64.4$ Hz (Unit 2). The SR additionally requires that within 3 seconds following load rejection, the voltage is $\geq 4106$ V and $\leq 4368$ V for (Unit 1), or $\geq 3994$ V and $\leq 4368$ V for (Unit 2), and within 4 seconds following load rejection, the frequency is $\geq 58.8$ Hz and $\leq 61.2$ Hz (Unit 1) or $\geq 59.9$ Hz and $\leq 60.3$ Hz (Unit 2). This changes the CTS by adding additional requirements to the surveillance requirement. | SR 3.8.1.8                      | 4.8.1.1.2.b.2   |

Table M  
More Restrictive Changes  
Section 3.8 - Electrical Power Systems

| ITS #<br>CTS #                        | DOC # | Description of Change  | ITS Requirement | CTS Requirement |
|---------------------------------------|-------|--|-----------------|-----------------|
| ITS 3.8.1 ITS 3.8.3<br>CTS 3.8.1.1    | M.16  | CTS Action a requires with one offsite circuit inoperable, it must be restored to OPERABLE status within 72 hours. CTS Action b states with one diesel generator inoperable, it must be restored to OPERABLE status within 14 days. The corresponding ITS Action A requires with one offsite circuit inoperable, the circuit must be restored to OPERABLE status within 72 hours and within 17 days from discovery of failure to meet the LCO. Corresponding ITS Action B states with one DG inoperable, the DG must be restored to OPERABLE status within 14 days and within 17 days from discovery of failure to meet the LCO. The CTS is revised to conform to the ITS. This changes the CTS by adding an additional restriction for an inoperable offsite circuit or DG that limits the total time for not meeting the LCO.  | Action A & B    | Action a & b    |
| ITS 3.8.2<br>CTS 3.8.1.2              |       | <b>None</b>  |                 |                 |
| ITS 3.8.7<br>ITS 3.8.9<br>CTS 3.8.2.1 | M.1   | CTS LCO 3.8.2.1 provides the requirements for the AC 4160 volt and AC 120 volts buses. CTS LCO 3.8.2.1 Actions a requires for the AC 4160 volt buses, "With one of the required trains of A.C. emergency busses not fully energized, re-energize the train within 8 hours." CTS LCO 3.8.2.1 Action b states for the AC 120 volts buses, "With one A.C. Vital Bus not energized, re-energize the A.C. Vital Bus within 2 hours." ITS LCO 3.8.9 provides the requirements for the distributions subsystems for the AC 4160 volts and AC 120 volts buses. ITS 3.8.9 Action A states with one or more AC electrical power distributions subsystems inoperable, restore AC electrical power distribution subsystem(s) to OPERABLE status within 8 hours and 16 hours from discovery of failure to meet LCO. ITS 3.8.9 Action B requires with one or more AC vital buses inoperable, restore AC vital bus subsystem(s) to OPERABLE status within 2 hours and 16 hours from discovery of failure to meet LCO. This changes the CTS by adding the requirement, "and 16 hours from discovery of failure to meet LCO." | Action A & B    | Action a        |
| ITS 3.8.7<br>ITS 3.8.9<br>CTS 3.8.2.1 | M.2   | CTS surveillance requirement 4.8.2.1 states "The specified busses shall be determined energized in the required manner at least once per 7 days by verifying correct breaker alignment and indicated voltage on the busses." ITS SR 3.8.7.1 requires verification of the correct inverter voltage and alignment to required AC vital buses. This changes the CTS by specifying each inverter is supplying the correct voltage instead of simply indicating voltage.  | SR 3.8.7.1      | 4.8.2.1         |
| ITS 3.8.7<br>ITS 3.8.9<br>CTS 3.8.2.1 | M.3   | CTS surveillance requirement 4.8.2.1 states "The specified busses shall be determined energized in the required manner at least once per 7 days by verifying correct breaker alignment and indicated voltage on the busses." ITS SR 3.8.9.1 requires the verification of correct breaker alignments and voltage to AC and AC vital bus electrical power distribution   | SR 3.8.9.1      | 4.8.2.1         |

Table M  
More Restrictive Changes  
Section 3.8 - Electrical Power Systems

| ITS #<br>CTS #                                     | DOC # | Description of Change   | ITS Requirement   | CTS Requirement |
|--|-------|---|-------------------|-----------------|
|  |       | subsystems. This changes the CTS by specifying each inverter is supplying the correct voltage instead of simply indicating voltage.   |                   |                 |
| ITS 3.8.8<br>ITS 3.8.10<br>CTS 3.8.2.2             | M.1   | CTS surveillance requirement 4.8.2.2 states "The specified busses shall be determined energized in the required manner by verifying correct breaker alignment and indicated voltage on the busses." ITS SR 3.8.8.1 requires verification of correct inverter voltage and alignments to required AC vital buses. This changes the CTS by specifying each inverter supplies the correct voltage.  | SR 3.8.8.1        | 4.8.2.2         |
| ITS 3.8.8<br>ITS 3.8.10<br>CTS 3.8.2.2             | M.2   | CTS surveillance requirement 4.8.2.2 states "The specified busses shall be determined energized in the required manner by verifying correct breaker alignment and indicated voltage on the busses." ITS SR 3.8.10.1 requires the verification of correct breaker alignments and voltage to required AC and AC vital bus electrical power distribution subsystems. This changes the CTS by specifying each inverter supplies the correct voltage.  | SR 3.8.10.1       | 4.8.2.2         |
|  |       |   |                   |                 |
| ITS 3.8.4<br>ITS 3.8.6<br>ITS 3.8.9<br>CTS 3.8.2.3 | M.1   | CTS LCO 3.8.2.3 Action a specifies with one of the required battery banks inoperable, restore the inoperable battery bank to OPERABLE status within 2 hours. ITS LCO 3.8.9 Condition C requires with one or more DC electrical power subsystems inoperable, restore the DC electrical power subsystem to OPERABLE status within 2 hours. ITS LCO 3.8.9 Condition C provides an additional limitation on the Completion Time. This specifies the two-hour requirement and 16 hours from discovery of failure to meet the LCO. This changes the CTS by requiring an additional limitation that is not currently required.   | 3.8.9 Condition C | Action a        |
| ITS 3.8.4<br>ITS 3.8.6<br>ITS 3.8.9<br>CTS 3.8.2.3 | M.2   | Unit 2 CTS LCO 3.8.2.3 Action b in part states with one of the required full capacity chargers inoperable, demonstrate the OPERABILITY of its associated battery bank by performing Surveillance Requirement 4.8.2.3.2.a.1 within one hour. The action allows with an inoperable charger in Unit 2, the spare charger to be substituted for an inoperable charger within 4 hours with no additional requirements specified. ITS LCO 3.8.4 Condition A states with one or two battery chargers on one train inoperable, restore battery terminal voltage to greater than or equal to the minimum established float voltage within 2 hours is specified by Required Action A.1. Required Action A.2 states a verification of float current of $\leq 2$ amps is required once per 12 hours. Required Action A.3 specifies that the inoperable charger(s) must be restored to OPERABLE status within 72 hours. This changes the Unit 2 CTS by replacing the Action to substitute the spare charger within 4 hours with more specific restoration Actions for the battery and the battery charger. | 3.8.4 Action A    | Action b        |
| ITS 3.8.4<br>ITS 3.8.6                             | M.3   | CTS surveillance requirement 4.8.2.3.2.a.1 requires once per 7 days that the battery bank be demonstrated OPERABLE by verifying all Category A parameters, listed in Table 3.8-1,   | SR 3.8.6.1        | 4.8.2.3.2.a.1   |

Table M  
More Restrictive Changes  
Section 3.8 - Electrical Power Systems

| ITS #<br>CTS #                                     | DOC # | Description of Change   | ITS Requirement | CTS Requirement |
|--|-------|---|-----------------|-----------------|
| ITS 3.8.9<br>CTS 3.8.2.3                           |       | are within specified limits for each pilot cell. The Category A parameters are electrolyte level, float voltage, and specific gravity. Two notes modify specific gravity requirements in CTS Table. Note (a) modifies the general requirement for specific gravity and states "Corrected for electrolyte temperature and level." Note (b) modifies the Category A and the allowable values of the Category B limits and states "Or battery charging current is less than (2) amps when on charge." The Category B limits apply to each connected cell. ITS SR 3.8.6.1 requires that the float current for each battery is verified $\leq 2$ amps every 7 days. A Note modifies the SR. The Note states "Not required to be met when battery terminal voltage is less than the minimum established float voltage of SR 3.8.4.1" This changes the CTS by eliminating the option to use specific gravity measurements in the Technical Specifications and providing an exception for terminal voltage less than the minimum for the use of charging current. |                 |                 |
| ITS 3.8.4<br>ITS 3.8.6<br>ITS 3.8.9<br>CTS 3.8.2.3 | M.4   | CTS 4.8.2.3.2.b.1 states the parameters in Table 3.8-1 meet the Category B limits every 92 days and within 7 days after a battery discharge or overcharge condition. Category B parameters applies to each connected cell. ITS SR 3.8.6.3 states "Verify each battery connected cell electrolyte level is greater than or equal to minimum established design limits," every 31 days. This changes the CTS by requiring each connected cell electrolyte level be verified every 31 days instead of 92 days.   | SR 3.8.6.3      | 4.8.2.3.2.b.1   |
| ITS 3.8.4<br>ITS 3.8.6<br>ITS 3.8.9<br>CTS 3.8.2.3 | M.5   | CTS surveillance requirement 4.8.2.3.1 requires the specified busses to be determined operable and energized by verifying correct breaker alignment and indicated power availability. ITS SR 3.8.9.1 requires verification of correct voltage and breaker alignments for the required buses. This changes the CTS by specifying the indicated bus voltage is the correct voltage.   | SR 3.8.9.1      | 4.8.2.3.1       |
| ITS 3.8.5<br>ITS 3.8.10<br>CTS 3.8.2.4             |       | CTS surveillance requirement 4.8.2.4.1 requires the specified busses to be determined operable and energized by verifying correct breaker alignment and indicated power availability. ITS SR 3.8.10.1 requires verification of correct voltage and breaker alignments for the required buses. This changes the CTS by specifying the indicated bus voltage is the correct voltage.  | SR 3.8.10.1     | 4.8.2.4.1       |

Table M  
More Restrictive Changes  
Section 3.9 - Refueling Operations

| ITS #<br>CTS #         | DOC # | Description of Change   | ITS Requirement | CTS Requirement |
|------------------------|-------|---|-----------------|-----------------|
| ITS 3.9.1<br>CTS 3.9.1 |       | <b>NONE</b>   |                 |                 |
| ITS 3.9.2<br>CTS 3.9.2 | M.1   | The CTS 3.9.2 LCO exception that allows only one source range monitor to be operable during installation of the upper internals is eliminated. This exception does not exist in the ISTS. This changes the CTS by eliminating an exception to the LCO requirements.   | LCO             | LCO             |
| ITS 3.9.2<br>CTS 3.9.2 | M.2   | CTS Action b for two inoperable source range monitors is revised by the addition of a new Action requirement consistent with the corresponding Required Actions of the ISTS. The ISTS Action to "initiate action to restore one source range neutron flux monitor to OPERABLE status immediately" is added to the existing CTS Action to verify the RCS boron concentration every 12 hours.   | Action          | Action          |
| ITS 3.9.2<br>CTS 3.9.2 | M.3   | CTS 4.9.2 requires a CHANNEL CHECK to be performed once per 12 hours during CORE ALTERATIONS. The corresponding ISTS SR requires a CHANNEL CHECK to be performed every 12 hours. This changes the CTS by requiring the CHANNEL CHECK to be performed every 12 hours in Mode 6 even if CORE ALTERATIONS are not in progress.   | SR 3.9.2.1      | 4.9.2           |
| ITS 3.9.2<br>CTS 3.9.2 | M.4   | CTS Surveillance Requirement 4.9.2 specifies testing for the source range instrumentation channels in Mode 6. The corresponding ISTS surveillances require the performance of a CHANNEL CALIBRATION on the source range monitors every 18 months. This 18-month surveillance is not specified in CTS 4.9.2. The CTS is revised to incorporate the ISTS 18-month channel Calibration requirement for the source range monitors. This addition changes the CTS by requiring a CHANNEL CALIBRATION every 18 months on each source range monitor. | SR 3.9.2.2      | NA              |
| ITS NA<br>CTS 3.9.3    |       | <b>NONE</b>   |                 |                 |
| ITS 3.9.3<br>CTS 3.9.4 | M.1   | <i>Unit 2 only.</i> The sections of CTS 3.9.4 marked-up for deletion and identified by the "M1" change designation are only contained in the Unit 2 CTS 3.9.4 and do not appear in the Unit 1 CTS 3.9.4. The Unit 2 provisions that allow open PAL doors and other containment penetrations added by Amendment 116 to Unit 2 CTS 3.9.4 are eliminated from the TS. This changes the Unit 2 LCO by eliminating the allowance for penetrations to be open.  | LCO             | LCO             |
| ITS 3.9.4              | M.1   | The CTS 3.9.8.1 actions applicable with less than one RHR loop in operation are revised   | Actions         | Actions         |

Table M  
More Restrictive Changes  
Section 3.9 - Refueling Operations

| ITS #<br>CTS #           | DOC # | Description of Change  | ITS Requirement | CTS Requirement |
|--------------------------|-------|--|-----------------|-----------------|
| CTS 3.9.8.1              |       | consistent with the corresponding ISTS Actions by the addition of a new requirement to initiate action to satisfy the RHR loop requirements. In addition, the nonspecific completion time for the CTS Actions to "suspend operations involving..." is revised by the addition of an immediate completion time for these CTS Actions, also consistent with the ISTS.  |                 |                 |
| ITS 3.9.4<br>CTS 3.9.8.1 | M.2   | CTS 3.9.8.1 Actions b and c specify, in part, that "the residual heat removal loop may be removed from operation for up to 1 hour per 8 hour period" and that " the residual heat removal loop may be removed from operation for up to 4 hours per 8 hour period during the performance of Ultrasonic In-service Inspection inside the reactor vessel nozzles." The corresponding ISTS requirement (LCO Note) contains a provision that limits the applicability of the CTS allowances. The ISTS limitation states "provided no operations are permitted that would cause introduction into the Reactor Coolant System, coolant with boron concentration less than required to meet the minimum required boron concentration of LCO 3.9.1." The CTS is revised to incorporate the ISTS limitation. This changes the CTS allowance by prohibiting operations that will cause introduction into the RCS, coolant with a boron concentration less than required to meet the boron concentration of LCO 3.9.1. | LCO Notes       | Actions b & c   |
| ITS 3.9.4<br>CTS 3.9.8.1 | M.3   | CTS 4.9.8.1 requires that an RHR loop be verified in operation and circulating a specified flow only in certain circumstances (i.e., during dilution and reduced inventory operations). The corresponding ITS surveillance (SR 3.9.4.2) specifies that the required RHR loop be verified in operation every 12 hours. This changes the CTS by requiring verification of the required RHR loop in operation every 12 hours regardless of the RCS water level or dilution operations.  | SR 3.9.4.2      | 4.9.8.1         |
| ITS 3.9.4<br>CTS 3.9.8.1 | M.4   | Unit 1 only. Unit 1 CTS 3.9.8.1 LCO only specifies that an RHR loop be in operation. The corresponding ITS 3.9.4 also requires that the RHR loop be operable. The CTS LCO is revised to conform to the ITS LCO. This changes the CTS LCO by adding the requirement for the RHR loop to be operable as well as in operation.  | LCO             | LCO             |
|                          |       |  |                 |                 |
| ITS 3.9.5<br>CTS 3.9.8.2 | M.1   | CTS 3.9.8.2 requires two independent RHR loops to be OPERABLE and at least one loop to be in operation. The corresponding ISTS specifies a surveillance that requires verification every seven days of correct breaker alignment and indicated power available to the RHR pump not in operation. The CTS does not have a corresponding surveillance. The CTS is revised to adopt the ITS SR 3.9.5.4 for the standby RHR pump. This changes the CTS by adding a new Surveillance Requirement.   | SR 3.9.5.4      | NA              |
|                          |       |  |                 |                 |
| ITS 3.9.3<br>ITS 3.3.6   |       | <b>NONE</b>  |                 |                 |

Table M  
 More Restrictive Changes  
 Section 3.9 - Refueling Operations

| ITS #<br>CTS #          | DOC # | Description of Change  | ITS Requirement | CTS Requirement |
|-------------------------|-------|--|-----------------|-----------------|
| CTS 3.9.9               |       |  |                 |                 |
|                         |       |  |                 |                 |
| ITS 3.9.6<br>CTS 3.9.10 | M.1   | The Action requirement for CTS 3.9.10 specifies that "With the requirements of the above specification not satisfied, suspend all operations involving movement of irradiated fuel assemblies within the containment and movement of fuel assemblies over irradiated fuel assemblies within the containment". No specific time is associated with the CTS Action. The corresponding Action in the ISTS requires that the Action be performed "immediately". The CTS is revised consistent with the ISTS to require that the Action be performed immediately. | Action          | Action          |

Table M  
More Restrictive Changes  
Section 4.0 - Design Features

| ITS #<br>CTS #     | DOC # | Description of Change | ITS Requirement | CTS Requirement |
|--------------------|-------|-----------------------|-----------------|-----------------|
| ITS 4.0<br>CTS 5.0 |       | NONE                  |                 |                 |

Table M  
More Restrictive Changes  
Section 5.0 – Administrative Controls

| ITS #<br>CTS #     | DOC # | Description of Change  | ITS Requirement          | CTS Requirement        |
|--------------------|-------|--|--------------------------|------------------------|
| ITS 5.0<br>CTS 6.0 | M.1   | CTS 6.8.1 specifies that written procedures be established, implemented, and maintained covering the activities referenced in CTS 6.8.1.a through 6.8.1.h. ITS 5.4.1.b is added to the list of CTS activities to cover emergency operating procedures (EOPs). This changes the CTS by requiring written procedures be established, implemented, and maintained covering emergency operating procedures.  | 5.4.1.b                  | 6.8.1                  |
| ITS 5.0<br>CTS 6.0 | M.2   | CTS 6.8.1 specifies that written procedures be established, implemented, and maintained covering the activities referenced in CTS 6.8.1.a through 6.8.1.h. ITS 5.4.1.e is added to the list of CTS activities to cover all programs and manuals specified in ITS 5.5. This changes the CTS by requiring written procedures be established, implemented, and maintained covering all programs and manuals specified in ITS 5.5.   | 5.4.1.e                  | 6.8.1                  |
| ITS 5.0<br>CTS 6.0 | M.3   | CTS do not include program requirements for component cyclic or transient limits, safety function determination, or battery monitoring and maintenance. ISTS includes programs for these activities. The CTS are revised to conform to the ISTS. This changes the CTS by adding the following programs. ITS 5.5.3 Component Cyclic or Transient Limit, ITS 5.5.11 Safety Function Determination Program (SFDP), ITS 5.5.13 Battery Monitoring and Maintenance Program.   | 5.5.3, 5.5.11,<br>5.5.13 | NA                     |
| ITS 5.0<br>CTS 6.0 | M.4   | CTS 6.8.1 specifies that written procedures be established, implemented, and maintained covering the activities referenced in CTS 6.8.1.a through 6.8.1.h. ITS 5.4.1.c is added to the list of CTS activities to cover the quality assurance for effluent and environmental monitoring. This changes the CTS by requiring written procedures be established, implemented, and maintained covering the quality assurance for effluent and environmental monitoring.   | 5.4.1.c                  | 6.8.1                  |
| ITS 5.0<br>CTS 6.0 | M.5   | (Unit 2 only) CTS 3/4.7.8.1, "Supplemental Leak Collection and Release System (SLCRS)" requires the heater controls to be operational. This requirement is reflected in ITS 3.7.12. The CTS, however, does not specify heater test parameters that would typically be included in ITS Section 5.0 for the Ventilation Filter Testing Program (VFTP) to support the operational requirements of the SLCRS heaters. The Unit 2 CTS has been revised to require the demonstration that the SLCRS heaters dissipate $\geq 160.9$ kW and $\leq 264.5$ kW when tested in accordance with ANSI N510-1980 (ITS 5.5.7.e).   | 5.5.7.e                  | NA                     |
| ITS 5.0<br>CTS 6.0 | M.6   | Unit 2 CTS 4.7.7.1.c provides the Frequency for performing in-place testing of CREVS and Unit 2 CTS 4.7.7.1.d provides the Frequency for performing carbon sample laboratory testing of the CREVS. The corresponding ITS 5.5.7 Frequencies contain an additional requirements for both in-place testing and laboratory testing of the CREVS. In addition to the Unit 2 CTS 4.7.7.1.c requirements for in-place testing, ITS 5.5.7 specifies the required in-place testing be performed "...following significant painting, fire, or chemical release in the vicinity of control room outside air intakes while the system is operating." In addition to the CTS 4.7.7.1.d requirements for carbon sample laboratory analysis, ITS 5.5.7 requires | 5.5.7                    | 4.7.7.1.c<br>4.7.7.1.d |

Table M  
 More Restrictive Changes  
 Section 5.0 – Administrative Controls

| ITS #<br>CTS # | DOC # | Description of Change   | ITS Requirement | CTS Requirement |
|----------------|-------|---|-----------------|-----------------|
|                |       | laboratory analysis “ after any structural maintenance on the charcoal adsorber bank housing.” This changes the CTS by the addition of new CREVS Frequency requirements for in-place testing and laboratory analysis of carbon samples. |                 |                 |