

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	1.0	1.0 4.1.1.1.1.a
1.0 A02	The CTS 1.1 states "The DEFINED TERMS of this section appear in capitalized type and are applicable throughout these Technical Specifications." The Note to ITS Section 1.1 states "The defined terms of this section appear in capitalized type and are applicable throughout these Technical Specifications and Bases." This changes the CTS by replacing the CTS 1.1 definition of "DEFINED TERMS" with a Note and adds a clarification phrase that the defined terms also apply to the Bases.	1.1	1.1
1.0 A03	<p>CTS 1.4 define OPERATIONAL MODES and Table 1.1, "OPERATIONAL MODES," provide a listing of the MODES. ITS Section 1.1 includes a definition of MODES and Table 1.1-1, "MODES." This changes the CTS MODE definitions in several ways:</p> <ul style="list-style-type: none"> • The phrase "Reactor vessel head unbolted or removed" in CTS Table 1.1 Note ** is replaced with "One or more reactor vessel head closure bolts less than fully tensioned" in ITS Table 1.1-1 Note c. • The CTS Table 1.1 Note ** condition "fuel in the vessel" is moved to the ITS MODE definition. • ITS Table 1.1-1 contains a new Note b, which applies to MODES 4 and 5. Note b states "All reactor vessel head closure bolts fully tensioned." This Note is the opposite of CTS Note ** and ITS Table 1.1-1 Note c. 	1.1 Table 1.1-1	1.4 Table 1.1

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	<ul style="list-style-type: none"> For consistency with the Notes in ITS Table 1.1-1, the ITS definition of MODE adds "reactor vessel head closure bolt tensioning" to the list of characteristics that define a MODE. Currently, the CTS definition does not include this clarification. 		
1.0 A04	<p>The CTS 1.6 definition of OPERABLE-OPERABILITY requires a system, subsystem, train, component or device to be capable of performing its "specified function(s)" and all necessary support systems to also be capable of performing their "function(s)." The ITS Section 1.1 definition of OPERABLE-OPERABILITY requires the system, subsystem, train, component, or device to be capable of performing the "specified safety function(s)," and requires all necessary support systems that are required for the system, subsystem, train, component, or device to perform its "specified safety function(s)" to also be capable of performing their related support functions. This changes the CTS by altering the requirement to be able to perform "functions" to a requirement to be able to perform "safety functions."</p>	1.1	1.6
1.0 A05	<p>The CTS 1.6 definition of OPERABLE-OPERABILITY requires that all necessary normal and emergency electrical power sources be available for the system, subsystem, train, component, or device to be OPERABLE. The ITS Section 1.1 definition of OPERABLE-OPERABILITY will replace the phrase "normal and emergency electrical power sources" with "normal or emergency electrical power sources." This changes the CTS definition of OPERABLE-OPERABILITY by allowing a device to be considered OPERABLE with either normal or emergency power available.</p>	1.1	1.6
1.0 A06	<p>CTS Section 1.0 includes the following definitions:</p> <ul style="list-style-type: none"> CONTAINMENT INTEGRITY; CORE ALTERATIONS; MEMBER(S) OF THE PUBLIC; 	None	1.8 1.12 1.37 1.38

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	<ul style="list-style-type: none"> • SITE BOUNDARY; and • UNRESTRICTED AREA <p>The ITS does not use this terminology and ITS Section 1.1 does not contain these definitions.</p>		1.39
1.0 A07	<p>CTS 1.9 defines CHANNEL CALIBRATION and states "The CHANNEL CALIBRATION shall encompass the entire channel including the sensor and alarm and/or trip functions." ITS 1.0 defines a CHANNEL CALIBRATION and states "The CHANNEL CALIBRATION shall encompass all devices in the channel required for channel OPERABILITY." It also states, "Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an in-place qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel. This results in a number of changes to the CTS.</p> <ul style="list-style-type: none"> • The CTS definition states "CHANNEL CALIBRATION shall encompass the entire channel including the sensor and alarm and/or trip functions." The ITS definition states "The CHANNEL CALIBRATION shall encompass all devices in the channel required for channel OPERABILITY." • The ITS definition adds the statement "Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an in place qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel." This allowance is not specifically stated in the CTS definition. 	1.1	1.9
1.0 A08	<p>CTS 1.11 defines CHANNEL FUNCTIONAL TEST for "Analog channels" as "the injection of a simulated signal into the channel as close to the primary sensor as practicable to verify OPERABILITY</p>	1.1	1.11

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	<p>including alarm and/or trip functions." CTS 1.11 also defines CHANNEL FUNCTIONAL TEST for "Bistable channels" as "the injection of a simulated signal into the channel sensor to verify OPERABILITY including alarm and/or trip functions." ITS Section 1.1 defines CHANNEL FUNCTIONAL TEST as "the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify OPERABILITY of all devices in the channel required for channel OPERABILITY" and states that the test "may be performed by means of any series of sequential, overlapping, or total channel steps." This results in a number of changes to the CTS. The addition of use of an "actual" signal is discussed in DOC L02 while the allowance to inject the signal "as close to the sensor as practicable" in lieu of "into" the sensor is discussed in DOC L03.</p> <ul style="list-style-type: none"> • The CTS definition states that the CHANNEL FUNCTIONAL TEST shall verify OPERABILITY "including alarm and/or trip functions." The ITS definition states that the CHANNEL FUNCTIONAL TEST shall verify "OPERABILITY of all devices in the channel required for channel OPERABILITY." • The ITS definition states "The CHANNEL FUNCTIONAL TEST may be performed by means of any series of sequential, overlapping, or total channel steps." The CTS definition does not include this statement. 		
1.0 A09	<p>CTS 1.13 provides a definition of SHUTDOWN MARGIN. CTS 4.1.1.1 provides an exception to the SHUTDOWN MARGIN definition, such that if a control rod is immovable or untrippable the SDM is modified (increased) by an amount at least equal to the withdrawn worth of the immovable or untrippable control rod(s). The ITS definition of</p>	1.1	1.13

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	<p>SHUTDOWN MARGIN (SDM) includes a statement that "With any CONTROL ROD not capable of being fully inserted, the reactivity worth of these CONTROL RODS must be accounted for in the determination of SDM." This change revises the Technical Specifications definition of SHUTDOWN MARGIN to include the statement that "With any CONTROL ROD not capable of being fully inserted, the reactivity worth of these CONTROL RODS must be accounted for in the determination of SDM."</p>		
<p>1.0 A10</p>	<p>CTS Section 1.0 provides definitions for CONTROLLED LEAKAGE, IDENTIFIED LEAKAGE, PRESSURE BOUNDARY LEAKAGE, and UNIDENTIFIED LEAKAGE. ITS Section 1.1 includes these requirements in one definition called LEAKAGE (which includes three categories: identified LEAKAGE, unidentified LEAKAGE, and pressure boundary LEAKAGE). This changes the CTS by incorporating the definitions into the ITS LEAKAGE definition with no technical changes. As a result, the ITS will not contain a defined term, "CONTROLLED LEAKAGE." Other changes to the LEAKAGE Specification (related to deleting the CONTROLLED LEAKAGE requirements) will be discussed in the Discussion of Changes for ITS 3.4.13, "RCS Operational LEAKAGE."</p>	<p>1.1</p>	<p>1.14 1.15 1.16 1.17</p>
<p>1.0 A11</p>	<p>The CTS 1.21 definition of STAGGERED TEST BASIS states, "A STAGGERED TEST BASIS shall consist of: a. A test schedule for n systems, subsystems, trains or designated components obtained by dividing the specified test interval into n equal subintervals, b. The testing of one system, subsystem, train or designated components at the beginning of each subinterval." The ITS Section 1.1 definition states, "A STAGGERED TEST BASIS shall consist of the testing of one of the systems, subsystems, trains, channels, or other designated components during the interval specified by the Surveillance Frequency,</p>	<p>1.1</p>	<p>1.21</p>

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	<p>so that all systems, subsystems, trains, channels, or other designated components are tested during n Surveillance Frequency intervals, where n is the total number of systems, subsystems, trains, channels, or other designated components in the associated function." This changes the CTS to specify the frequency of a Surveillance on one system, subsystem, train, or other designated component in the Frequency column of the ITS instead of specifying the frequency in which all systems, subsystems, trains, or other designated components must be tested.</p>		
<p>1.0 A12</p>	<p>CTS 1.22 provides a definition of FREQUENCY NOTATION and includes CTS Table 1.2, which lists these notations. CTS 1.42 provides a definition for "REFUELING INTERVAL." The ITS will not contain this information in Section 1.1, but will state the requirements in each Surveillance.</p>	<p>1.1</p>	<p>1.22 1.42 Table 1.2</p>
<p>1.0 A13</p>	<p>CTS 1.25 provides a definition of REACTOR PROTECTION SYSTEM RESPONSE TIME, CTS 1.26 provides a definition of SAFETY FEATURE RESPONSE TIME, and CTS 1.28 provides a definition of STEAM AND FEEDWATER RUPTURE CONTROL SYSTEM RESPONSE TIME. ITS Section 1.1 modifies the definitions to more fully describe how the tests are performed. The ITS states that the "response time test may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured." Currently, the CTS does not describe this manner of testing.</p>	<p>1.1</p>	<p>1.25 1.26 1.28</p>
<p>1.0 A14</p>	<p>CTS 1.13 provides a definition of SHUTDOWN MARGIN. The ITS definition of SHUTDOWN MARGIN includes a statement that "In MODES 1 and 2, the fuel and moderator temperatures are changed to the nominal zero power design level." This change revises the Technical Specifications to include the statement that "In MODES 1 and 2, the fuel and moderator temperatures are changed to the nominal</p>	<p>1.1</p>	<p>1.13</p>

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	zero power design level."		
1.0 A15	ITS Section 1.1 provides definitions of ALLOWABLE THERMAL POWER, AXIAL POWER SHAPING RODS (APSRs), CONTROL RODS, NUCLEAR HEAT FLUX HOT CHANNEL FACTOR, (F_Q), NUCLEAR ENTHALPY RISE HOT CHANNEL FACTOR ($F_{\Delta H}^N$), and PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR). These terms are not defined in the CTS. This changes the CTS by adding the above terms.	1.1	None
1.0 A16	<p>CTS Table 1.1, OPERATIONAL MODES, is revised. The corresponding table in ITS Section 1.1 is Table 1.1-1, MODES. The changes to the CTS are:</p> <ul style="list-style-type: none"> • The CTS Table 1.1 minimum average reactor coolant temperature for MODES 1 and 2 is changed from $\geq 280^\circ\text{F}$ to "NA" (not applicable) in ITS Table 1.1-1. • The CTS Table 1.1 MODE 6 upper limit on average reactor coolant temperature ($\leq 140^\circ\text{F}$) is removed. In ITS Table 1.1-1, the MODE 6 average reactor coolant temperature limit is specified as "NA" (not applicable). • The RATED THERMAL POWER limit of 0% in CTS Table 1.1 for MODES 3, 4, 5, and 6 is changed in ITS Table 1.1-1 to "NA" (not applicable). 	1.1 Table 1.1-1	Table 1.1
1.0 A17	<p>ITS Sections 1.2, 1.3, and 1.4 contain information that is not in the CTS. This change to the CTS adds explanatory information on ITS usage that is not applicable to the CTS. The added sections are:</p> <ul style="list-style-type: none"> • <u>Section 1.2 - Logical Connectors</u> Section 1.2 provides specific examples of the logical connectors 	1.2 1.3 1.4	None

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	<p><u>"AND"</u> and <u>"OR"</u> and the numbering sequence associated with their use.</p> <ul style="list-style-type: none"> <p><u>Section 1.3 - Completion Times</u></p> <p>Section 1.3 provides guidance on the proper use and interpretation of Completion Times. The section also provides specific examples that aid in the use and understanding of Completion Times.</p> <p><u>Section 1.4 - Frequency</u></p> <p>Section 1.4 provides guidance on the proper use and interpretation of Surveillance Frequencies. The section also provides specific examples that aid in the use and understanding of Surveillance Frequency.</p> 		
1.0 A18	This change to CTS 1.3 is provided in the Davis-Besse ITS consistent with License Amendment Request No. 05-0007, submitted to the USNRC for approval in FENOC letter Serial Number 3198, from Mark B. Bezilla (FENOC) to USNRC, dated April 12, 2007. As such, this change is administrative.	1.1	1.3
2.0 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	2.0	2.0
3.0 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-	3.0	3.0 3.7.7 Action a

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	1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).		
3.0 A02	<p>CTS 3.0.1 states, "Limiting Conditions for Operation and ACTION requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for each specification." ITS LCO 3.0.1 states, "LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2, LCO 3.0.7, and LCO 3.0.8." This results in several changes to the CTS.</p> <ul style="list-style-type: none"> • Certain phrases are revised to be consistent with the equivalent phrase used in the ITS. Specifically, "Limiting Conditions for Operation" is changed to "LCOs" and "OPERATIONAL MODES or other conditions specified" is changed to "MODES or other specified conditions" to be consistent with the ITS definition of MODE and the terminology used in the ITS. • The phrase ". . . ACTION requirements shall be applicable during the OPERATIONAL MODES . . ." is moved from CTS 3.0.1 to ITS LCO 3.0.2 which states upon discovery or a failure to meet an LCO, the Required Actions of the associated Conditions shall be met. • The phrase "shall be applicable" is replaced in ITS LCO 3.0.1 with the phrase "shall be met." This change is made to be consistent with the ITS terminology and to clarify the concept of an LCO being met (i.e., being in compliance with the requirements of the LCO), versus the LCO being applicable or required (i.e., the requirements in the LCO apply). • The phrase "except as provided in LCO 3.0.2, 3.0.7, and 3.0.8" is added in ITS LCO 3.0.1. ITS LCO 3.0.2 describes the appropriate 	LCO 3.0.1 LCO 3.0.2	3.0.1

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	<p>actions to be taken when ITS LCO 3.0.1 is not met. LCO 3.0.7 describes Test Exception LCOs, which are exceptions to other LCOs. LCO 3.0.8 addresses snubber inoperabilities, which is also an exception to other LCOs. LCO 3.0.2 modifies ITS LCO 3.0.1 since the ACTION requirements discussion that is in CTS 3.0.1 has been moved to ITS LCO 3.0.2, as described above.</p>		
<p>3.0 A03</p>	<p>CTS 3.0.2 states, "Adherence to the requirements of the Limiting Condition for Operation and/or associated ACTION within the specified time interval shall constitute compliance with the specification. In the event the Limiting Condition for Operation is restored prior to expiration of the specified time interval, completion of the ACTION statement is not required." ITS LCO 3.0.2 states "Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6. If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated." This results in several changes to the CTS.</p> <ul style="list-style-type: none"> • The first sentence in CTS 3.0.2 states, in part, "Adherence to the requirements of the Limiting Condition for Operation and/or associated ACTION . . . shall constitute compliance with the specification." This requirement is divided into portions of ITS LCO 3.0.1, "LCOs shall be met" and ITS LCO 3.0.2, "Upon discovery of failure to meet an LCO, the Required Actions of the associated Conditions shall be met." • The phrase "except as provided in LCO 3.0.5" has been added to CTS 3.0.2 since ITS LCO 3.0.5 (LCO 3.0.6) already includes the allowance (CTS 3.0.6 states that the allowance is an exception to 	<p>LCO 3.0.2</p>	<p>3.0.2</p>

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	<p>Specification 3.0.2).</p> <ul style="list-style-type: none"> CTS 3.0.2 is revised to include an exception for ITS LCO 3.0.6. LCO 3.0.6 is a new allowance that takes exception to the ITS LCO 3.0.2 requirement to take the Required Actions when the associated LCO is not met. This exception is included in LCO 3.0.2 to avoid conflicts between the applicability requirements. The second sentence of CTS LCO 3.0.2 states, "In the event the Limiting Condition for Operation is restored prior to expiration of the specified time interval, completion of the ACTION statement is not required." The sentence is replaced in ITS LCO 3.0.2 with "If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated." 		
3.0 A04	<p>CTS LCO 3.0.3 is applicable "When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements." ITS LCO 3.0.3 expands those applicability requirements so that the requirement is applicable "When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS." This changes the CTS to add two new applicability conditions.</p> <ul style="list-style-type: none"> ITS LCO 3.0.3 is applicable when the LCO is not met and there is no applicable ACTION to be taken. ITS LCO 3.0.3 is applicable when directed by the associated ACTIONS. The CTS and the ITS contain such requirements. Any technical changes related to directing LCO 3.0.3 entry in an ACTION will be discussed in the affected Technical Specifications. 	LCO 3.0.3	3.0.3

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3.0 A05	<p>CTS 3.0.3, in part, states "action shall be initiated within 1 hour to place the unit in a MODE in which the Specification does not apply." CTS 3.0.3 also states the shutdown time limits in sequential order; i.e., each time limit is measured from the completion of the previous step. ITS 3.0.3 states "Actions shall be initiated in 1 hour to place the unit." ITS 3.0.3 states the time limits (Completion Times) from the time the condition was entered. In addition, the MODE titles used in CTS 3.0.3 are replaced with the corresponding MODE numbers in ITS LCO 3.0.3. The stated times in CTS 3.0.3 and ITS LCO 3.0.3 are listed below:</p> <table border="1" data-bbox="500 652 1421 1053"> <thead> <tr> <th><u>Mode</u></th> <th><u>Title</u></th> <th><u>CTS Time to Enter Mode</u></th> <th><u>ITS Time to Enter Mode</u></th> </tr> </thead> <tbody> <tr> <td>--</td> <td>(Current Mode)</td> <td>1 hour to begin action</td> <td>1 hour to begin action</td> </tr> <tr> <td>3</td> <td>Hot Standby</td> <td>within the next 6 hours</td> <td>7 hours</td> </tr> <tr> <td>4</td> <td>Hot Shutdown</td> <td>within the following 6 hours</td> <td>13 hours</td> </tr> <tr> <td>5</td> <td>Cold Shutdown</td> <td>within the subsequent 24 hours</td> <td>37 hours</td> </tr> </tbody> </table>	<u>Mode</u>	<u>Title</u>	<u>CTS Time to Enter Mode</u>	<u>ITS Time to Enter Mode</u>	--	(Current Mode)	1 hour to begin action	1 hour to begin action	3	Hot Standby	within the next 6 hours	7 hours	4	Hot Shutdown	within the following 6 hours	13 hours	5	Cold Shutdown	within the subsequent 24 hours	37 hours	LCO 3.0.3	3.0.3
<u>Mode</u>	<u>Title</u>	<u>CTS Time to Enter Mode</u>	<u>ITS Time to Enter Mode</u>																				
--	(Current Mode)	1 hour to begin action	1 hour to begin action																				
3	Hot Standby	within the next 6 hours	7 hours																				
4	Hot Shutdown	within the following 6 hours	13 hours																				
5	Cold Shutdown	within the subsequent 24 hours	37 hours																				
3.0 A06	<p>CTS 3.0.3 states "Where corrective measures are completed that permit operation under the ACTION requirements, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation." ITS LCO 3.0.3 states "Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required. LCO 3.0.3 is applicable in MODES 1, 2, 3, and 4."</p>	LCO 3.0.3	3.0.3																				
3.0	ITS LCO 3.0.6 is added to the CTS to provide guidance regarding the	LCO 3.0.6	None																				

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A07	<p>appropriate ACTIONS to be taken when a single inoperability (a support system) also results in the inoperability of one or more related systems (supported system(s)). LCO 3.0.6 states "When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Specification 5.5.14, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered. When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2." In the CTS, based on the intent and interpretation provided by the NRC over the years, there has been an ambiguous approach to the combined support/supported inoperability. Some of this history is summarized below:</p> <ul style="list-style-type: none"> • Guidance provided in the June 13, 1979, NRC memorandum from Brian K. Grimes (Assistant Director for Engineering and Projects) to Samuel E. Bryan (Assistant Director for Field Coordination) would indicate an intent/interpretation consistent with the proposed LCO 3.0.6, without the necessity of also requiring additional ACTIONS. That is, only the inoperable support system ACTIONS need be taken. • Guidance provided by the NRC in their April 10, 1980, letter to all 		

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	<p>Licensees, regarding the definition of OPERABILITY and its impact as a support system on the remainder of the CTS, would indicate a similar philosophy of not taking ACTIONS for the inoperable supported equipment. However, in this case, additional actions (similar to the proposed Safety Function Determination Program actions) were addressed and required.</p> <ul style="list-style-type: none"> • Generic Letter 91-18 and a plain-English reading of the CTS provide an interpretation that inoperability, even as a result of a Technical Specification support system inoperability, requires all associated ACTIONS to be taken. • Certain CTS contain ACTIONS such as "Declare the {supported system} inoperable and take the ACTIONS of {its Specification}." In many cases, the supported system would likely already be considered inoperable. The implication of this presentation is that the ACTIONS of the inoperable supported system would not have been taken without the specific direction to do so. 		
3.0 A08	<p>ITS LCO 3.0.7 is added to the CTS. LCO 3.0.7 states "Test Exception LCOs 3.1.8 and 3.1.9 allow specified Technical Specification (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Test Exception LCOs is optional. When a Test Exception LCO is desired to be met but is not met, the ACTIONS of the Test Exception LCO shall be met. When a Test Exception LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications."</p>	LCO 3.0.7	None
3.0 A09	<p>CTS 4.0.1 states, "Surveillance Requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual</p>	SR 3.0.1	4.0.1 4.0.3

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	<p>Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement." CTS 4.0.3 states, "Failure to perform a Surveillance Requirement within the allowed surveillance interval defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation (LCO) except as noted below." CTS 4.0.3 also states, "Surveillance requirements do not have to be performed on inoperable equipment." These allowances have been included in ITS LCO 3.0.1. ITS LCO 3.0.1 states, "SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits." The changes to the CTS are:</p> <ul style="list-style-type: none"> • The phrase "shall be applicable" is replaced in ITS SR 3.0.1 with the phrase "shall be met." This change is made to be consistent with the ITS terminology and to clarify the concept of an SR being met (i.e., being in compliance with the requirements of the SR), versus the SR being applicable or required (i.e., the requirements in the SR apply). • The second sentence of ITS SR 3.0.1 includes the statement, "Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO." 		

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	<p>This changes the CTS by adding the clarification "whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance."</p> <ul style="list-style-type: none"> The first sentence in CTS 4.0.3 states, "Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute non compliance with the OPERABILITY requirements for a Limiting Condition for Operation (LCO), except as noted below." The last sentence in CTS 4.0.3 states, "Surveillance requirements do not have to be performed on inoperable equipment." The third sentence in ITS SR 3.0.1 states, "Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3." The last statement in ITS SR 3.0.1 states, "Surveillances do not have to be performed on inoperable equipment or variables outside specified limits." The changes the CTS by moving the first sentence of CTS 4.0.3 to the third sentence of SR 3.0.1 and by moving the last sentence of CTS 4.0.3 to the fourth sentence of SR 3.0.1 and adds the term "or variables outside limits." 		
3.0 A10	<p>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 specified surveillance interval." ITS SR 3.0.2 states "The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met. For Frequencies specified as 'once,' the above interval extension does not apply. If a Completion Time requires periodic performance on a 'once per . . .' basis, the above Frequency extension applies to each performance after the initial performance. Exceptions to this Specification are stated in the individual Specifications." This results in</p>	SR 3.0.2	4.0.2

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	<p>several changes to the CTS.</p> <ul style="list-style-type: none"> • ITS SR 3.0.2 adds to the CTS "For Frequencies specified as 'once,' the above interval extension does not apply." This is described in DOC M01. • ITS SR 3.0.2 adds to the CTS "If a Completion Time requires periodic performance on a 'once per . . . ' basis, the above Frequency extension applies to each performance after the initial performance." This is described in DOC L02. • 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 specified surveillance interval." ITS SR 3.0.2 states, in part, "The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency." This change is made to be consistent with the ITS terminology and to clarify the concept of the specified SR Frequency being met. • ITS SR 3.0.2 is more specific regarding the start of the Frequency by stating, "as measured from the previous performance or as measured from the time a specified condition of the Frequency is met." This direction is consistent with the current use and application of the Technical Specifications. • ITS SR 3.0.2 adds to the CTS "Exceptions to this Specification are stated in the individual Specifications." 		
3.0 A11	CTS 3.0.4, in part, states "This provision shall not prevent passage through OPERATIONAL MODES as required to comply with ACTION	LCO 3.0.4 SR 3.0.4	3.0.4 4.0.4

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	statements." CTS 4.0.4 does not include a similar statement. ITS LCO 3.0.4 and SR 3.0.4, in part, state "This Specification shall not prevent entry in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit." This changes the CTS by revising the phrase in CTS 3.0.4 and adding the phrase to CTS 4.0.4.		
3.1.1 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.1.1	3.1.1.1
3.1.1 A02	The Applicability of CTS 3.1.1.1 is MODES 1, 2, 3, 4, and 5, and includes a footnote (*) to the MODE 2 Applicability stating, "See Special Test Exception 3.10.4." ITS 3.1.1 does not contain this footnote, or a reference to Special Test Exception 3.10.4. This changes the CTS by deleting the reference footnote.	None	3.1.1.1 Applicability footnote *
3.1.1 A03	The Applicability of CTS 3.1.1.1 is MODES 1, 2, 3, 4, and 5, and includes a footnote (**) to the MODE 3 Applicability stating, "See LCO 3.7.9, Steam Generator Level, for additional SHUTDOWN MARGIN requirements." CTS 3.7.9 establishes maximum steam generator level requirements in MODE 3 that, in conjunction with adjusted SDM requirements specified in operating procedures, provide adequate SDM to ensure the reactor will remain subcritical during a MODE 3 Main Steam Line Break. ITS 3.1.1 does not contain this footnote, or a reference to CTS 3.7.9. This changes the CTS by deleting the reference footnote.		3.1.1.1 Applicability footnote **
3.1.1 A04	CTS 3.1.1.1 provides SDM requirements in MODES 1, 2, 3, 4 and 5. CTS 4.1.1.1.b states that when in MODE 1 or 2 with $k_{eff} \geq 1.0$, SDM is determined by verifying that the regulating rod groups withdrawal is	3.1.1	3.1.1.1 4.1.1.1

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	<p>within the limits of CTS 3.1.3.6, Regulating Rod Insertion Limits. ITS 3.1.1 is applicable in MODES 3, 4, and 5. ITS 3.2.1, "Regulating Rod Insertion Limits," contains the regulating rod insertion limits in MODES 1 and 2. CTS 4.1.1.1.2 requires the core reactivity balance to be compared to the predicted values at least once every 31 EFPD. ITS 3.1.2, "Reactivity Balance," contains the reactivity limits in MODES 1 and 2. This changes the CTS by placing the SDM requirements applicable in MODES 3, 4 and 5 in ITS 3.1.1, and placing the SDM requirements applicable in MODES 1 and 2 in ITS 3.1.2 and ITS 3.2.1.</p>		
3.1.2 A01	<p>In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).</p>	3.1.2	3.1.1.1
3.1.2 A02	<p>CTS 4.1.1.1.2 requires the overall core reactivity balance be compared to predicted values to demonstrate agreement within $\pm 1\% \Delta k/k$. However, this Surveillance is currently part of the SHUTDOWN MARGIN Specification. A new LCO, ITS LCO 3.1.2, requires the measured core reactivity balance to be within $\pm 1\% \Delta k/k$ of predicted values. This changes the CTS by having a separate Specification for the core reactivity balance requirement.</p>	3.1.2	4.1.1.1.2
3.1.3 A01	<p>In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).</p>	3.1.3	3.1.1.3
3.1.3 A02	<p>The Applicability of CTS 3.1.1.3 is modified by footnote # that states "See Special Test Exception 3.10.1." ITS 3.1.3 Applicability does not</p>	None	3.1.1.3 Applicability footnote #

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.3 A03	<p>contain the footnote or a reference to the Special Test Exception.</p> <p>CTS 4.1.1.3.1 requires MTC to be determined to be within limits by confirmatory measurements. MTC measured values shall be extrapolated and/or compensated to permit direct comparison with the above limits. CTS 4.1.1.3.2.a requires MTC to be determined prior to initial operation above 5% RTP after each fuel loading and CTS 4.1.1.3.2.b requires MTC to be determined at any THERMAL POWER, within 7 days after reaching a RATED THERMAL POWER equilibrium boron concentration of 300 ppm. ITS SR 3.1.3.1 requires verification that MTC is within the upper limit specified in the COLR prior to entering MODE 1 after each fuel loading and ITS SR 3.1.3.2 requires verification that the extrapolated MTC is within the lower limit specified in the COLR each fuel cycle within 7 effective full power days (EFPDs) after reaching an equilibrium boron concentration equivalent to 300 ppm. In addition, ITS SR 3.1.3.2 includes a Note that states "If the MTC is more negative than the COLR limit when extrapolated to the end of cycle, SR 3.1.3.2 may be repeated. Shutdown must occur prior to exceeding the minimum allowable boron concentration at which MTC is projected to exceed the lower limit." This changes the CTS by clarifying that during the performance of CTS 4.1.1.3.2.a (ITS SR 3.1.3.1) the upper MTC limit is checked and during the performance of CTS 4.1.1.3.2.b (ITS SR 3.1.3.2) the lower limit is checked. In addition, the change clarifies that if the MTC is more negative than the COLR limit when extrapolated to the end of cycle, SR 3.1.3.2 may be repeated and a shutdown is not required until MTC is projected to exceed the lower limit.</p>	<p>SR 3.1.3.1 SR 3.1.3.2</p>	<p>4.1.1.3.1 4.1.1.3.2.a 4.1.1.3.2.b</p>
3.1.4 A01	<p>In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).</p>	<p>3.1.4</p>	<p>3.1.3.1 3.1.3.4 4.1.1.1.1.a</p>

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.4 A02	The Applicability of CTS 3.1.3.1 is modified by footnote * that states "See Special Test Exceptions 3.10.1 and 3.10.2." ITS 3.1.4 Applicability does not contain the footnote or a reference to the Special Test Exceptions.	None	3.1.3.1 Applicability footnote *
3.1.4 A03	CTS 3.1.3.1 Action c.1 states that with one control rod misaligned from its group average height by more than the rod misalignment requirements, POWER OPERATION may continue provided that within one hour, the affected rod is restored to OPERABLE status within the above alignment requirements. ITS 3.1.4 does not contain a Required Action stating that the rod must be restored to OPERABLE status within the alignment limits.	None	3.1.3.1 Action c.1
3.1.4 A04	CTS 3.1.3.1 Action c.2.e states that with one control rod misaligned from its group average height by more than the rod misalignment requirements, POWER OPERATION may continue provided that the remainder of the rods in the same group as the inoperable rod are aligned to within the allowed rod misalignment of the inoperable rod within one hour while maintaining the position of the rods within the limits as specified in the COLR; the THERMAL POWER level shall be restricted pursuant to Specification 3.1.3.6 during subsequent operation. ITS 3.1.4 does not contain a similar Required Action.	None	3.1.3.1 Action 2.c.e
3.1.5 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS)	3.1.5	3.1.3.5
3.1.5 A02	The Applicability of CTS 3.1.3.5 is modified by footnote * that states "See Special Test Exceptions 3.10.1 and 3.10.2." ITS 3.1.5 Applicability does not contain the footnote or a reference to the Special Test Exceptions.	None	3.1.3.5 Applicability footnote *

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.5 A03	If a maximum of one safety rod is not fully withdrawn, CTS 3.1.3.5 Action a requires the rod to be fully withdrawn. ITS 3.1.5 does not contain a Required Action stating fully withdraw the rod.	None	3.1.3.5 Action a
3.1.5 A04	If a maximum of one safety rod is not fully withdrawn, CTS 3.1.3.5 Action b allows the rod to be declared inoperable and apply Specification 3.1.3.1. Specification 3.1.3.1 requires the control (safety and regulating) rods to be OPERABLE and positioned within the alignment limits. For a safety rod not fully withdrawn CTS 3.1.3.1 Action c would be entered and the plant is allowed to continue to operate as long as the compensatory actions are taken. ITS 3.1.5 Required Action A.2 requires the rod to be declared misaligned. This changes the CTS by clarifying the type of Actions to take when one safety rod cannot be fully withdrawn. Changes to the actions in CTS 3.1.3.1 Action c are discussed in the Discussion of Changes for ITS 3.1.4, "Control Rod Group Alignment Limits."	3.1.5 Required Action A.2	3.1.3.5 Action b
3.1.6 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.1.6	3.1.3.2
3.1.6 A02	The Applicability of CTS 3.1.3.2 is MODES 1 and 2 with footnote * stating "See Special Test Exception 3.10.1 and 3.10.2." ITS 3.1.6 Applicability is MODES 1 and 2 and does not contain the footnote or a reference to the Special Test Exception. This changes the CTS by deleting explicit reference to the Special Test Exception.	None	3.1.3.2 Applicability footnote *
3.1.6 A03	CTS 3.1.3.2 Action a states that with a maximum of one APSR inoperable or misaligned from its group average height by more than the alignment requirements, operation may continue provided that within 2 hours the APSR group is positioned such that the misaligned	None	3.1.3.2 Action a

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	rod is restored to within limits of the group average height requirements. ITS 3.1.6 does not contain a Required Action stating that the APSR group must be positioned such that the misalignment rod is restored to within limits. This changes the CTS by deleting the explicit action to restore to within limits.		
3.1.7 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.1.7	3.1.3.3
3.1.7 A02	CTS 3.1.3.3 Action a covers the inoperabilities for a maximum of one absolute position indicator channel per control rod group or one relative position indicator channel per control rod group. CTS 3.1.3.3 Action b covers the inoperabilities for more than one relative position indicator channel per control rod group. CTS 3.1.3.3 Action c states, "The provisions of Specification 3.0.4 are not applicable." The allowance in CTS 3.1.3.3 Action c applies to CTS 3.1.3.3 Action a and CTS 3.1.3.3 Action b. ITS 3.1.7 ACTION A covers inoperabilities for the relative position indicator channels for one or more rods and ITS ACTION B covers inoperabilities the absolute position indicator channels for one or more rods. ITS ACTION C covers the inoperabilities for absolute position indicator channel and relative position indicator channels for one or more rods. ITS 3.1.7 ACTION A and ACTION B allow continuous operation in the Applicability if the Required Actions are met. The ITS 3.1.7 ACTIONS do not include a Note similar to the allowance in CTS 3.1.3.3 Action c. This changes the CTS by deleting the explicit allowance in CTS 3.1.3.3 Action c.	None	3.1.3.3 Action c
3.1.8 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS),	3.1.8	3.10.1 3.1.1.1

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).		
3.1.8 A02	CTS 3.10.1 does not specify any requirements for SDM. CTS 3.1.1.1 requires SDM to be met in MODE 1. ITS LCO 3.1.8 part d requires SDM to be within limits specified in the COLR. This changes the CTS by adding the SDM requirements to the PHYSICS TEST Exception LCO.	LCO 3.1.8 part d	3.1.1.1 3.10.1
3.1.8 A03	CTS 3.10.1 allows the limitations of Specification 3.1.3.7 to be suspended during the performance of the PHYSICS TEST. ITS 3.1.8 does not include this specific allowance to suspend Specification 3.1.3.7 during the performance of the PHYSICS test.	None	3.10.1
3.1.9 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.1.9	3.10.2 3.1.1.1
3.1.9 A02	CTS 3.10.2 allows the limitation of Specification 3.1.3.7 to be suspended during the performance of the PHYSICS TEST. ITS 3.1.9 does not include this specific allowance to suspend Specification 3.1.3.7 during the performance of the PHYSICS test.	None	3.10.2
3.2.1 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.2.1	3.1.3.6 3.1.1.1
3.2.1	The Applicability of CTS 3.1.3.6 is MODES 1 and 2 with footnote *	None	3.1.3.6 Applicability

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
A02	stating "See Special Test Exception 3.10.1 and 3.10.2." The Applicability of CTS 3.1.1.1 includes MODE 1 and MODE 2, however MODE 2 footnote * states "See Special Test Exception 3.10.4." ITS 3.2.1 Applicability does not contain the footnote or a reference to any Special Test Exception.		footnote * 3.1.1.1 Applicability footnote *
3.2.2 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.2.2	3.1.3.9
3.2.2 A02	In the event the APSRs are outside the operating limits specified in the CORE OPERATING LIMITS REPORT (COLR), CTS 3.1.3.9 Action b requires a reduction in THERMAL POWER to less than or equal to that fraction of RATED THERMAL POWER which is allowed by the rod group position using the acceptable operating limits provided in the COLR within 2 hours, as one of three alternative actions. ITS 3.2.2 does not provide a comparable Required Action for this Condition. This change deletes the CTS Action to reduce THERMAL POWER to less than or equal to that fraction of RATED THERMAL POWER which is allowed by the rod group position using the acceptable operating limits provided in the COLR within 2 hours, in the event that the APSRs are not within the limits provided in the COLR.	None	3.1.3.9 Action b
3.2.3 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.2.3	3.2.1
3.2.3	The Applicability of CTS 3.2.1 is MODE 1 above 40% RATED	None	3.2.1 Applicability

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
A02	THERMAL POWER with footnote * stating "See Special Test Exception 3.10.1." ITS 3.2.3 Applicability is MODE 1 above 40% RATED THERMAL POWER and does not contain the footnote or a reference to the Special Test Exception. This changes the CTS by deleting explicit reference to the Special Test Exception.		footnote *
3.2.4 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.2.4	3.2.4
3.2.4 A02	The Applicability of CTS 3.2.4 is modified by footnote * stating "See Special Test Exception 3.10.1." ITS 3.2.4 Applicability does not contain the footnote or a reference to the Special Test Exception.	None	3.2.4 Applicability footnote *
3.2.4 A03	CTS 3.2.4 Action a.1.a states that with QPT determined to exceed the Steady State Limit but less than or equal to the Transient Limit within 2 hours to reduce the QPT to within its Steady State Limit. ITS 3.2.4 does not contain a Required Action stating QPT must be reduced to within its limit	None	3.2.4 Action a.1.a
3.2.5 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.2.5	3.2.2 3.2.3
3.3.1 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and	3.3.1	3.3.1.1 2.2.1

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A02	<p>Wilcox Plants" (ISTS).</p> <p>CTS 4.3.1.1.3 requires REACTOR PROTECTION SYSTEM RESPONSE TIME testing of "each" reactor trip function. ITS SR 3.3.1.8 is the REACTOR PROTECTION SYSTEM RESPONSE TIME testing Surveillance, but in ITS Table 3.3.1-1, it is only required for Functions 1.a (High Flux – High Setpoint), 3 (RC High Pressure), 4 (RC Low Pressure), 7 (High Flux/Number of Coolant Pumps On), and 8 (Flux - ΔFlux - Flow). This changes the CTS by specifically stating that the Surveillance is only applicable to certain Functions, not "each" function.</p>	SR 3.3.1.8	4.3.1.1.3
3.3.1 A03	<p>CTS 4.3.1.1.3 states, in part, that the RPS RESPONSE TIME of each trip function shall be demonstrated to be within its limit at least once every N times the REFUELING INTERVAL where N is the total number of redundant channels in a specific reactor trip function as shown in the "Total No. of Channels" column of Table 3.3-1. ITS SR 3.3.1.8 requires the verification of RPS RESPONSE TIME every 24 months "on a STAGGERED TEST BASIS." The ITS definition of STAGGERED TEST BASIS is consistent with the CTS testing Frequency. This changes the CTS by utilizing the ITS definition of STAGGERED TEST BASIS.</p>	SR 3.3.1.8	4.3.1.1.3
3.3.1 A04	<p>CTS 4.3.1.1.3 footnote (*) states that the response times includes the sensor (except for the neutron detectors), Reactor Protection System instrument delay, and the control rod drive breaker delay. ITS SR 3.3.1.8 requires verification that RPS RESPONSE TIME is within limits and includes a Note that states neutron detectors are excluded from the RPS RESPONSE TIME testing. This changes the CTS by deleting some of the details of what is included in the scope of the test.</p>	SR 3.3.1.8	4.3.1.1.3
3.3.1 A05	<p>CTS Table 3.3-1 specifies the "TOTAL NO. OF CHANNELS" and the "MINIMUM CHANNELS OPERABLE" associated with each RPS Functional Unit. For CTS Table 3.3-1 Functional Units 2, 3, 4, 5, 6, 7, 8,</p>	Table 3.3.1-1	Table 3.3-1

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	<p>and 9 the number of channels listed in the "TOTAL NO. OF CHANNELS" column is greater than that listed in the "MINIMUM OPERABLE CHANNELS" column. CTS Table 3.3-1 Actions 2 and 3 specify the actions to take with the number of channels OPERABLE one less than required by the "Total Number of Channels" requirement. CTS Table 3.3-1 Action 10 specify the actions to take with the number of channels OPERABLE, one less than required by the "Minimum Channels OPERABLE" requirement . ITS LCO 3.3.1 requires four channels of RPS instrumentation for each Function in ITS Table 3.3.1-1 to be OPERABLE. The LCO requires four channels to be OPERABLE and this is consistent with the number of channels listed in the CTS "TOTAL NO. OF CHANNELS" column. The ITS 3.3.1 ACTIONS require entry when the OPERABLE channels are one, two, or three or more less than required by the LCO. This changes the CTS by increasing the number of channels listed in the LCO to match the number listed in the "TOTAL NO. OF CHANNELS" column.</p>		
3.3.1 A06	<p>CTS Table 3.3-1 Functional Unit 2 requires the High Flux channels to be OPERABLE in MODES 1 and 2. CTS Table 3.3-1 Functional Unit 4 (Flux - ΔFlux - Flow), Functional Unit 5 (RC Low Pressure), Functional Unit 7 (RC Pressure-Temperature), and Functional Unit 8 (High Flux/Number of Reactor Coolant Pumps On) are also only required to be OPERABLE in MODES 1 and 2 however Note (a) states that these trips may be manually bypassed when RCS pressure < 1820 psig by actuating Shutdown Bypass provided that the High Flux Trip Setpoint is < 5% RTP, the Shutdown Bypass High Pressure Trip Setpoint of < 1820 psig is imposed, and the Shutdown Bypass is removed when RCS pressure > 1820 psig. ITS 3.3.1 Table 3.3.1-1 Function 1.a requires the High Flux - High Setpoint channels to be OPERABLE in MODE 1, MODE 2 when not in shutdown bypass operation (Footnote a), and MODE 3 with any CRD trip breaker in the closed position, the CRD System capable of rod withdrawal, and not in shutdown bypass</p>	Table 3.3.1-1	Table 3.3-1

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	<p>operation (Footnote b). ITS Table 3.3.1-1 Function 1.b requires the High Flux - Low Setpoint Function (Allowable Value of < 5% RTP) to be OPERABLE in MODES 2, 3, 4, and 5 during shutdown bypass operation with any CRD trip breaker in the closed position and the CRD System capable of rod withdrawal. ITS Table 3.3.1-1 Function 4 (RC Low Pressure), Function 5 (RC Pressure-Temperature), Function 7 (High Flux/Number of Coolant Pumps On), and Function 8 (Flux - ΔFlux - Flow) are required to be OPERABLE in MODES 1 and in MODE 2 when not in shutdown bypass operation (Footnote a). This changes the CTS by splitting CTS Table 3.3-1 Functional Unit 2 (High Flux) into two distinct functions, High Flux - High Setpoint (ITS Table 3.3.1-1 Function 1.a) and High Flux - Low Setpoint (ITS Table 3.3.1-1 Function 1.b) and describes in a positive sense when the Functions are required to be OPERABLE. A change to the Applicability of the High Flux - Low Setpoint during MODES 3, 4, and 5 is also discussed in DOC M07.</p>		
3.3.1 A07	<p>The "CHANNEL TO TRIP" column for CTS Table 3.3-1 Functional Unit 4 (Flux - ΔFlux - Flow) and Functional Unit 8 (High Flux/Number of Reactor Coolant Pumps on) include a Note (b) that states the trips may be manual bypassed when Specification 3.10.3 is in effect. The Applicability for these Functions in ITS Table 3.3.1-1 do not contain the footnote or a reference to the Special Test Exception.</p>	Table 3.3.1-1	Table 3.3-1
3.3.1 A08	<p>CTS Table 3.3-1 Functional Units 2 through 9 and Functional Unit 14 include a Note # that applies to Actions 2, 3, 6, and 11 and states the provisions of Specification 3.0.4 are not applicable. ITS 3.3.1 does not include this Note. This changes the CTS by deleting the specific exception to Specification 3.0.4.</p>	None	Table 3.3-1 Note #
3.3.1 A09	<p>CTS Table 3.3-1 Functional Unit 14 requires the Shutdown Bypass High Pressure channels to be OPERABLE in MODES 2, 3, 4, and 5. CTS Table 4.3-1 Functional Unit 14 specifies Surveillance requirements in</p>	Table 3.3.1-1 footnote (f)	Tables 3.3-1 and 4.3-1 Note **

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	the same MODES. This Applicability is modified by Table 3.3-1 Note (**) and Table 4.3-1 Note (**) that states "When Shutdown Bypass is actuated." ITS Table 3.3.1-1 Function 9 requires the Shutdown Bypass High Pressure channels to be OPERABLE in MODES 2, 3, 4, and 5. This Applicability is modified by Table 3.3-1 Footnote (f) that states "During shutdown bypass operation with any CRD trip breaker in the closed position and the CRD System capable of rod withdrawal." This changes the CTS by clarifying when the equipment is needed.		
3.3.1 A10	CTS Table 3.3-1 Note (a) part 3 states that the Shutdown Bypass is removed when RCS pressure > 1820 psig. ITS 3.3.1 does not include this requirement. This changes the CTS by deleting the requirement.	None	Table 3.3-1
3.3.1 A11	CTS Table 2.2-1 provides two Allowable Values for the Reactor Protection System (RPS) High Flux trip (Functional Unit 2); one for four reactor coolant pump operation and the other for three reactor coolant pump operation. ITS Table 3.3.1-1 includes two Allowable Values for the High Flux trip (Function 1.a), but also includes the clarifying information that the three reactor coolant pump Allowable Value is applicable when reset per LCO 3.4.4, "RCS Loops - MODES 1 and 2." This changes the CTS by adding clarifying information as to specifically when the three reactor coolant pump Allowable Value becomes applicable.	Table 3.3.1-1	Table 2.2-1
3.3.1 A12	CTS Table 4.3-1 Functional Unit 4 requires the performance of a CHANNEL CHECK of the Flux - ΔFlux - Flow instrumentation however Table 4.3-1 Note 4 states that the CHANNEL CHECK includes AXIAL POWER IMBALANCE and loop flow indications only. ITS SR 3.3.1.1, the CHANNEL CHECK requirement, does not include this Note. This changes the CTS by deleting the Note.	None	Table 4.3-1
3.3.1 A13	These changes to CTS Table 2.2-1 Functional Unit 2, CTS Table 3.3-1 Functional Unit 2, CTS Table 3.3-1 Action 11, and CTS Table 4.3-1 Note (2) are provided in the Davis-Besse ITS consistent with License	LCO 3.3.1 (second part), ACTION F,	Table 2.2-1, Table 3.3-1, and Table 4.3-1

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	Amendment Request No. 05-0007, submitted to the USNRC for approval in FENOC letter Serial Number 3198, from Mark B. Bezilla (FENOC) to USNRC, dated April 12, 2007, as modified by FENOC letters L-08-065, from Mark B. Bezilla (FENOC) to USNRC, dated February 20, 2008 and L-08-175, from Barry S. Allen (FENOC), dated May 16, 2008. As such, this change is administrative.	SR 3.3.1.2, and Table 3.3.1-1	
3.3.1 A14	CTS Table 4.3-1 Note (10), in part, states that for certain RPS Functions, the limiting trip setpoint, the pre-determined as-found acceptance criteria band, and the as-left setpoint tolerance band are specified in a document incorporated by reference into the UFSAR. ITS Table 3.3.1-1 Footnote (d) states that the same information is specified in the Technical Requirements Manual (TRM). This changes the CTS by specifically delineating the document (i.e., TRM) where the information is located.	Table 3.3.1-1 footnote d	Table 4.3-1 Note 10
3.3.1 A15	CTS Table 3.3-1 Action 10, states, in part, to be in HOT STANDBY within the next 6 hours and open the reactor trip breakers. ITS 3.3.1 Required Action D.2 requires the control rod drive breakers to be open only for Functions 1.a, 3, and 6. This changes the CTS by requiring the control rod drive breakers to be open only for Functions that include a MODE 3 Applicability requirement.	3.3.1 Required Action D.2	Table 3.3-1 Action 10
3.3.2 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.3.2	3.3.1.1 Table 2.2-1
3.3.3 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with	3.3.3	3.3.1.1

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).		
3.3.3 A02	CTS Table 3.3-1 Functional Unit 13 requires 2 RTMs per trip system. ITS LCO 3.3.3 requires four channels of RPS RTMs to be OPERABLE. This changes the CTS by defining the total number of channels required to be OPERABLE instead of the minimum number of channels required per trip system.	3.3.3	Table 3.3-1 Functional Unit 13
3.3.3 A03	CTS Table 3.3-1 Functional Unit 13 (RTM) includes a Note (#) that applies to ACTION 7 and states the provisions of Specification 3.0.4 are not applicable. ITS 3.3.3 does not include this Note. This changes the CTS by deleting the specific exception to Specification 3.0.4.	None	Table 3.3-1 Functional Unit 13
3.3.4 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.3.4	3.3.1.1
3.3.4 A02	CTS Table 3.3-1 Functional Unit 12 requires a minimum of two Control Rod Drive Trip Breakers per trip system to be OPERABLE. ITS LCO 3.3.4 requires four Control Rod Drive Trip Breakers to be OPERABLE. This changes the CTS by defining the total number of channels required to be OPERABLE instead of the minimum number of channels required per trip system.	3.3.4	Table 3.3-1 Functional Unit 12
3.3.4 A03	CTS Table 3.3-1 Functional Unit 12 (Control Rod Drive Trip Breakers) includes a Note (#) that applies to ACTION 7 and ACTION 8 and states the provisions of Specification 3.0.4 are not applicable. In addition, CTS Table 3.3-1 Functional Unit 15 (CR Relays) includes the same Note that applies to ACTION 9. ITS 3.3.4 ACTIONS A, B, and E do not include this Note. This changes the CTS by deleting the specific exception to Specification 3.0.4.	None	Table 3.3-1 Functional Unit 12

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.5 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.3.5	3.3.2.1
3.3.5 A02	CTS 3.3.2.1 Actions and CTS Table 3.3-3 provide the compensatory actions to take when SFAS instrumentation is inoperable. ITS 3.3.5 ACTIONS provide the compensatory actions for inoperable SFAS Instrumentation. The ITS 3.3.5 ACTIONS include a Note that allows separate Condition entry for each Parameter. This modifies the CTS by providing a specific allowance to enter the Action for each inoperable SFAS instrumentation Parameter.	3.3.5 ACTIONS Note	3.3.2.1 Actions Table 3.3-3
3.3.5 A03	CTS 4.3.2.1.3 requires SAFETY FEATURES RESPONSE TIME testing of "each" SFAS function. ITS SR 3.3.5.5 is the SFAS RESPONSE TIME testing Surveillance, but in ITS Table 3.3.5-1, it is only required for Functions 1 (Reactor Coolant System Pressure - Low), 2 (Reactor Coolant System Pressure – Low Low), 3 (Containment Pressure – High), and 4 (Containment Pressure – High High). This changes the CTS by specifically stating that the Surveillance is only applicable to certain Functions, not "each" Function.	SR 3.3.5.5	4.3.2.1.3
3.3.5 A04	CTS 4.3.2.1.3 states, in part, that the SAFETY FEATURES RESPONSE TIME of each SFAS function shall be demonstrated to be within the limit at least once per REFUELING INTERVAL. The requirement specifies that each test shall include at least one functional unit per function such that all functional units are tested at least once every N times the REFUELING INTERVAL, where N is the total number of redundant functional units in a specific SFAS function as shown in the "Total No. of Units" column of Table 3.3-3. ITS SR 3.3.5.5 requires the verification of SFAS RESPONSE TIME every 24 months "on a	1.0 SR 3.3.5.5	4.3.2.1.3

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	<p>STAGGERED TEST BASIS." The ITS definition of STAGGERED TEST BASIS is consistent with the CTS testing Frequency. This changes the CTS by utilizing the ITS definition of STAGGERED TEST BASIS.</p>		
<p>3.3.5 A05</p>	<p>CTS 4.3.2.1.3 footnote * states that the response times (except for manual initiation) include the diesel generator starting and sequence loading delays, when applicable. The response time limit (except for manual initiation) includes movement of valves and attainment of pump or blower discharge pressure. ITS SR 3.3.5.5 does not provide these details, however the definition of SFAS RESPONSE TIME states, in part, states "SFAS RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its SFAS actuation setpoint at the channel sensor until the SFAS equipment is capable of performing its safety function (i.e., the valves travel to their required positions, pump discharge pressures reach their required values, etc)." In addition, the definition states that "Times shall include diesel generator starting and sequence loading delays, where applicable." This changes the CTS by incorporating the details of the testing requirements into the SFAS RESPONSE TIME definition.</p>	<p>1.0 SR 3.3.5.5</p>	<p>4.3.2.1.3</p>
<p>3.3.5 A06</p>	<p>CTS Table 3.3-3 specifies the "TOTAL NO. OF UNITS" and the "MINIMUM UNITS OPERABLE" associated with each SFAS Instrument String. For CTS Table 3.3-3 Instrument String b, c, d, and e the number of units listed in the "TOTAL NO. OF UNITS" column is greater than that listed in the "UNITS OPERABLE" column. CTS Table 3.3-3 Action 10 specify the actions to take with the number of OPERABLE functional units one less than required by the "Total Number of Units" requirement. ITS LCO 3.3.5 requires four channels to be OPERABLE and this is consistent with the number of channels listed in the CTS "TOTAL NO. OF UNITS" column. The ITS 3.3.5 ACTIONS require entry when the OPERABLE channels are one less than required by the LCO. This changes the CTS by increasing the number of channels listed in the</p>	<p>3.3.5 ACTIONS</p>	<p>Table 3.3-3, including Action 10</p>

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	LCO to match the number listed in the "TOTAL NO. OF UNITS" column.		
3.3.5 A07	CTS Table 3.3-3 Instrument String b, c, d, and e include a Note # that applies to Action 10 and states the provisions of Specification 3.0.4 are not applicable. ITS 3.3.5 does not include this Note. This changes the CTS by deleting the specific exception to Specification 3.0.4.	None	Table 3.3-3 Note #
3.3.6 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS)	3.3.6	3.3.2.1
3.3.6 A02	CTS 3.3.2.1 Actions and CTS Table 3.3-3 provide the compensatory actions to take when SFAS instrumentation is inoperable. ITS 3.3.6 ACTIONS provide the compensatory actions for inoperable SFAS manual initiation channels. The ITS 3.3.6 ACTIONS include a Note that allows separate Condition entry for each Function. This modifies the CTS by providing a specific allowance to enter the Action for each inoperable SFAS manual Function.	3.3.6 ACTIONS Note	3.3.2.1 Actions and Table 3.3-3
3.3.7 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.3.7	3.3.2.1
3.3.7 A02	CTS 3.3.2.1 Actions and CTS Table 3.3-3 provide the compensatory actions to take when SFAS output logic is inoperable. ITS 3.3.7 ACTIONS provide the compensatory actions for inoperable SFAS output logic. The ITS 3.3.7 ACTIONS include a Note that allows separate Condition entry for each automatic actuation logic. This modifies the CTS by providing a specific allowance to enter the Action	3.3.7 ACTIONS Note	3.3.2.1 Actions Table 3.3-3

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	for each inoperable automatic actuation logic.		
3.3.8 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.3.8	3.3.2.1
3.3.8 A02	CTS 3.3.2.1 requires the Safety Feature Actuation System (SFAS) functional units shown in Table 3.3-3 to be OPERABLE. ITS 3.3.8 requires specific channels per bus for the Loss of Voltage and specific channels per bus for the Degraded Voltage Functions to be OPERABLE. This changes the CTS by having a separate Specification for the EDG LOPS in lieu of including it with the SFAS Instrumentation Specification.	3.3.8	3.3.2.1, Table 3.3-3 Functional Unit 4
3.3.8 A03	CTS 3.3.2.1 Actions and CTS Table 3.3-3 provide the compensatory actions to take when EDG LOPS instrumentation are inoperable. ITS 3.3.8 ACTIONS provide the compensatory actions for inoperable LOPS instrumentation. The ITS 3.3.8 ACTIONS include a Note that allows separate Condition entry for each Function. This modifies the CTS by providing clarification regarding entry into the Action for each inoperable EDG LOPS Function.	3.3.8 ACTIONS Note	3.3.2.1 Actions Table 3.3-3
3.3.8 A04	CTS 4.3.2.1.3 requires SAFETY FEATURES RESPONSE TIME testing of "each" SFAS function. ITS 3.3.8 does not include response time testing for the EDG LOPS Instrumentation Functions. This changes the CTS by clearly identifying that the SAFETY FEATURES RESPONSE TIME testing does not apply to the EDG LOPS Instrumentation Functions.	None	4.3.2.1.3
3.3.8 A05	CTS Table 3.3-3, Functional Units 4.b and 4.c (Degraded Voltage and Loss of Voltage) include a Note # that applies to Action 15 and states the provisions of Specification 3.0.4 are not applicable. ITS 3.3.8 does	None	Table 3.3-3 Action 15 Note #

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	not include this Note. This changes the CTS by deleting the specific exception to Specification 3.0.4.		
3.3.9 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.3.9	3.3.1.1
3.3.9 A02	CTS 3.3.1, "Reactor Protection System Instrumentation," requires the Reactor Protection System instrumentation channels and shutdown bypasses of Table 3.3-1 to be OPERABLE. ITS 3.3.9, "Source Range Neutron Flux," requires source range neutron flux channels to be OPERABLE. This changes the CTS by having a separate Specification for the Source Range Neutron Flux, in lieu of including it with the Reactor Protection System Instrumentation Specification.	3.3.9	3.3.1
3.3.9 A03	CTS 4.3.1.1.3 and the * footnote require REACTOR PROTECTION SYSTEM (RPS) RESPONSE TIME testing of "each" reactor trip function. ITS 3.3.9 does not include response time testing for the source range neutron flux channels. This changes the CTS by clearly identifying that the REACTOR PROTECTION SYSTEM RESPONSE TIME testing does not apply to the source range neutron flux channels.	None	4.3.1.1.3 including footnote *
3.3.9 A04	CTS Table 3.3-1 Functional Unit 11.A (Startup) requires the Source Range Neutron Flux channels to be OPERABLE in MODE 2 and in MODE * (With the control rod drive trip breakers in the closed position and the control rod drive system capable of rod withdrawal). CTS Table 3.3-1 Functional Unit 11.B (Shutdown) requires the Source Range Neutron Flux channels to be OPERABLE in MODES 3, 4, and 5. ITS LCO 3.3.9 does not specify the MODE * requirement. This changes the CTS by deleting the requirement for the Source Range Neutron Flux channels to be OPERABLE in MODE *.	3.3.9 Applicability	Table 3.3-1 Functional Units 11.A and 11.B

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.10 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS)	3.3.10	3.3.1.1
3.3.10 A02	CTS 3.3.1, "Reactor Protection System Instrumentation," requires the Reactor Protection System instrumentation channels and shutdown bypasses of Table 3.3-1 to be OPERABLE. ITS 3.3.10, "Intermediate Range Neutron Flux," requires intermediate range neutron flux channels to be OPERABLE. This changes the CTS by having a separate Specification for the Intermediate Range Neutron Flux, in lieu of including it with the Reactor Protection System Instrumentation Specification.	3.3.10	3.3.1
3.3.10 A03	CTS 4.3.1.1.3 and the * footnote require REACTOR PROTECTION SYSTEM (RPS) RESPONSE TIME testing of "each" reactor trip function. ITS 3.3.10 does not include response time testing for the intermediate range neutron flux channels. This changes the CTS by clearly identifying that the REACTOR PROTECTION SYSTEM RESPONSE TIME testing does not apply to the intermediate range neutron flux channels.	None	4.3.1.1.3 including footnote *
3.3.11 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.3.11	3.3.2.2
3.3.11 A02	CTS 3.3.2.2 specifies compensatory actions to take when SFRCS Functional Units are inoperable. ITS 3.3.11 ACTIONS provides the compensatory actions for inoperable SFRCS Functions. The ITS 3.3.11	3.3.11 ACTIONS Note	3.3.2.2

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	ACTIONS include a Note that allows separate Condition entry for each Function. This modifies the CTS by providing a specific allowance to enter the Action for each inoperable SFRCS Function.		
3.3.11 A03	<p>CTS 4.3.2.2.3 states, in part, that the SFRCS RESPONSE TIME of each trip function shall be demonstrated to be within the limit at least once per REFUELING INTERVAL and that each test shall include at least one channel per function such that all channels are tested at least once every N times the REFUELING INTERVAL where N is the total number of redundant channels in a specific SFRCS trip function as shown in the "Total No. of Channels" column of Table 3.3-11.</p> <p>ITS SR 3.3.11.5 requires the verification of SFRCS RESPONSE TIME every 24 months "on a STAGGERED TEST BASIS." Additionally, a Note has been added to ITS SR 3.3.11.5 stating "N" equals 2 channels for the purpose of determining the STAGGERED TEST BASIS Frequency. The ITS definition of STAGGERED TEST BASIS and the Note is consistent with the CTS testing Frequency. This changes the CTS by utilizing the ITS definition of STAGGERED TEST BASIS.</p>	1.0 SR 3.3.11.5	4.3.2.2.3
3.3.11 A04	<p>CTS Table 3.3-11 Functional Unit 1 identifies that there are 8 pressure switches of Main Steam Pressure Low Instrument Channels. It also identifies that 4 of these switches are associated with Channel 1 (i.e., actuation channel 1) and that 2 of these switches are monitoring steam line 1 while the other 2 switches are monitoring steam line 2. It also identifies that 4 of these switches are associated with Channel 2 (i.e., actuation channel 2) and that 2 of these switches are monitoring steam line 1 while the other 2 switches are monitoring steam line 2. CTS Table 3.3-11 Functional Unit 2 identifies that there are 8 differential pressure switches of Feedwater/Steam Generator Differential Pressure – High Instrument Channels. It also identifies that 4 of these switches are associated with Channel 1 (i.e., actuation channel 1) and that 2 of these switches are monitoring Feedwater/Steam Generator 1 while the other 2 switches are monitoring Feedwater/Steam Generator 2. It also</p>	Table 3.3.11-1 Functions 1, 2, 3, and 4	Table 3.3-11 Functional Units 1, 2, 3, and 4

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	<p>identifies that 4 of these switches are associated with Channel 2 (i.e., actuation channel 1) and that 2 of these differential pressure switches are monitoring Feedwater/Steam Generator 1 while the other 2 differential pressure switches are monitoring Feedwater/Steam Generator 2. CTS Table 3.3-11 Functional Unit 3 identifies that there are 8 LSLL of Steam Generator Level - Low Instrument Channels. It also identifies that 4 of these LSLL are associated with Channel 1 (i.e., actuation channel 1) and that 2 of these LSLL are monitoring Steam Generator 1 while the other 2 LSLL are monitoring Steam Generator 2. It also identifies that 4 of these LSLL are associated with Channel 2 (i.e., actuation channel 1) and that 2 of these LSLL are monitoring Steam Generator 1 while the other 2 LSLL are monitoring Steam Generator 2. CTS Table 3.3.11- Functional Unit 4 requires the Loss of Reactor Coolant Pump (RCP) Channels to be OPERABLE. CTS Table 3.3.11 requires a minimum of 2 channels (i.e., actuation channels) to be OPERABLE. ITS Table 3.3.11-1 Function 1 (Main Steam Line Pressure-Low) requires 4 channels per steam line to be OPERABLE. ITS Table 3.3.11-1 Function 2 (Feedwater/Steam Generator Differential Pressure-High) requires 4 channels per feed line to be OPERABLE. ITS Table 3.3.11-1 Function 3 (Steam Generator Level-Low) requires 4 channels per steam generator to be OPERABLE. ITS Table 3.3.11-1 Function 4 requires 4 Loss of RCPs channels to be OPERABLE. This changes CTS by only specifying requirements for instrument channels to be OPERABLE. Requirements for the actuation channels are discussed in the Discussion of Changes for ITS 3.3.13</p>		
3.3.11 A05	<p>CTS Table 3.3-11 Functional Units 1 through 4 include a Note # that applies to Action 16 and states the provisions of Specification 3.0.4 are not applicable. ITS 3.3.11 does not include this Note. This changes the CTS by deleting the specific exception to Specification 3.0.4.</p>	None	Table 3.3-11 Action 16 Note #
3.3.12 A01	<p>In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS),</p>	3.3.12	3.3.2.2

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).		
3.3.12 A02	CTS 3.3.2.2 specifies compensatory actions to take when SFRCS manual controls are inoperable. ITS 3.3.12 ACTIONS provides the compensatory actions for inoperable SFRCS manual initiation Functions. The ITS 3.3.12 ACTIONS include a Note that allows separate Condition entry for each Function. This modifies the CTS by providing a specific allowance to enter the Action for each inoperable SFRCS manual Function.	3.3.12 ACTIONS Note	3.3.2.2
3.3.13 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.3.13	3.3.2.2
3.3.13 A02	CTS 3.3.2.2 specifies compensatory actions to take when SFRCS logic channels are inoperable. ITS 3.3.13 ACTIONS provides the compensatory actions for inoperable SFRCS Functions. The ITS 3.3.13 ACTIONS include a Note that allows separate Condition entry for each Function. This modifies the CTS by providing a specific allowance to enter the Action for each inoperable SFRCS Function.	3.3.13 ACTIONS Note	3.3.2.2
3.3.14 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.3.14	3.3.3.1
3.3.14	Not used.	NA	NA

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
A02			
3.3.14 A03	CTS 3.3.3.1 Action c states that the provisions of Specification 3.0.4 are not applicable. ITS 3.3.14 does not include this Note. This changes the CTS by deleting the specific exception to Specification 3.0.4.	None	3.3.3.1 Action c
3.3.15 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.3.15	3.7.6.1
3.3.15 A02	CTS 3.7.6.1 Action b requires restoring the inoperable channel to OPERABLE status or requires the isolation of the control room ventilation system. The ITS 3.3.15 ACTION A does not include the specific option to restore the inoperable channel to OPERABLE status. This changes the CTS by not explicitly stating the requirement to restore the inoperable channel to OPERABLE status.	None	3.7.6.1 Action b
3.3.15 A03	CTS 3.7.6.1 contains requirements for Control Room Emergency Ventilation System and Control Room Emergency Ventilation Instrument System. The ITS conversion is splitting the CTS Specification into two ITS Specifications ITS 3.7.10, "Control Room Emergency Ventilation System," and ITS 3.3.15, "Station Vent Normal Range Radiation Monitoring."	3.3.15	3.7.6.1
3.3.16 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.3.16	3.3.2.3
3.3.16 A02	CTS Table 3.3-17 Action Statements specify compensatory actions to take when ARTS instrumentation is inoperable. ITS 3.3.16 ACTIONS	3.3.16 ACTIONS Note	Table 3.3-17 Actions

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	provide the compensatory actions for inoperable ARTS instrumentation. The ITS 3.3.16 ACTIONS include a Note that allows separate Condition entry for each Function. This modifies the CTS by providing a specific allowance to enter the Action for each inoperable ARTS instrumentation Function.		
3.3.16 A03	CTS 4.3.2.3 states, in part, that the Anticipatory Reactor Trip System shall be demonstrated OPERABLE by the performance of the CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST for the modes and at the frequencies shown on Table 4.3-17. CTS Table 4.3-17 does not require a CHANNEL CALIBRATION for any of the ARTS Functional Units; the Table specifies "Not Applicable" for the CHANNEL CALIBRATION requirement. The CTS Table does require a CHANNEL FUNCTIONAL TEST for all three of the Functions. ITS 3.3.16 includes a CHANNEL FUNCTIONAL TEST for ITS Table 3.3.16-1 Function 3 only and a CHANNEL CALIBRATION for ITS Table 3.3.16-1 Functions 1 and 2 only. The ITS Frequencies for the CHANNEL CALIBRATION are the same as the CTS Frequencies for the CHANNEL FUNCTIONAL TEST. This changes the CTS by not specifying a CHANNEL CALIBRATION requirement for CTS Table 4.3-17 Functional Unit 3 and by changing the CTS Table 4.3-17 Functional Units 1 and 2 tests from a CHANNEL FUNCTIONAL TEST to a CHANNEL CALIBRATION.	SR 3.3.16.2, SR 3.3.16.3	4.3.2.3, Table 4.3-17
3.3.16 A04	CTS Tables 3.3-17 and 4.3-17 require the Turbine Trip Functional Unit (Functional Unit 1) to be OPERABLE in MODE 1. However, CTS Tables 3.3-17 and 4.3-17 footnote (b) states that this ARTS Functional Unit is Applicable only above 45% RATED THERMAL POWER. ITS Table 3.3.16-1 Function 1 requires the Turbine Trip Function to be OPERABLE at > 45% RTP. This changes the CTS by clearly stating the Applicability of the Turbine Trip Function.	Table 3.3.16 Function 1	Tables 3.3-17 and 4.3-17 footnote (b)
3.3.16 A05	CTS Table 3.3-17 specifies the "TOTAL NO. OF CHANNELS" and the "MINIMUM CHANNELS OPERABLE" associated with each ARTS	Table 3.3.16-1 Function 3	Table 3.3-17 Functional Unit 3,

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	<p>Functional Unit. For CTS Table 3.3-17 Functional Unit 3 the number of channels listed in the "TOTAL NO. OF CHANNELS" column is 4 while the number of channels listed in the "MINIMUM OPERABLE CHANNELS" column is 3. CTS Table 3.3-17 Action 20 specifies the actions to take with the number of channels OPERABLE one less than required by the "Total Number of Channels" requirement. ITS Table 3.3.16-1 requires four channels of ARTS instrumentation for Function 3 to be OPERABLE, which is consistent with the number of channels listed in the CTS "TOTAL NO. OF CHANNELS" column. The ITS 3.3.16 ACTIONS require entry when the OPERABLE channels are one less than required by Table 3.3.16-1. This changes the CTS by increasing the number of channels listed in the MINIMUM CHANNELS OPERABLE column of the Table to match the number listed in the "TOTAL NO. OF CHANNELS" column.</p>		including Action 20
3.3.16 A06	<p>CTS Table 3.3-17 ACTION 18 requires that if the minimum required OPERABLE channels for Functional Unit 1 (Turbine Trip) are not restored to OPERABLE status within 72 hours, then the unit must reduce power to < 45% RTP within the next 6 hours. CTS Table 3.3-17 ACTION 19 requires that if the minimum required OPERABLE channels for Functional Unit 2 (Trip of Both Main Feed Pump Turbines) are not restored to OPERABLE status within 72 hours, then the unit must be in HOT STANDBY (MODE 3) within the next 6 hours. Under the same conditions, ITS 3.3.16 Required Action A.1 requires a power reduction to < 45% RTP in 6 hours for Function 1 and ITS 3.3.16 Required Action B.2 requires the unit to be placed in MODE 2 in 6 hours for Function 2. This changes the CTS by requiring the unit to reduce power to < 45% RTP instead of < 45% RTP for Functional Unit 1 and to be placed in MODE 2 instead of MODE 3 for Functional Unit 2.</p>	3.3.16 Required Actions A.1 and B.2	Table 3.3-17 Actions 18 and 19
3.3.16 A07	<p>CTS Table 3.3-17 ACTION 20, in part, states that with the number of OPERABLE channels for Functional Unit 3 (Output Logic) one less than the Total Number of Channels, operation can continue provided the</p>	None	Table 3.3-17 Action 20

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	Minimum Channels OPERABLE requirement is met. The ITS 3.3.16 ACTIONS does not include this specific statement. This changes the CTS by deleting this specific statement.		
3.3.17 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.3.17	3.3.3.6
3.3.17 A02	CTS 3.3.3.6 Action a provides the compensatory actions to take when PAM instrumentation is inoperable. ITS 3.3.17 ACTIONS provide the compensatory actions for inoperable PAM instrumentation. The ITS 3.3.17 ACTIONS include a Note that allows separate Condition entry for each Function. In addition, separate Condition entry is allowed within a Function on a reactor coolant loop basis for Functions 2 (Reactor Coolant Loop Outlet Temperature) and 3 (Reactor Coolant Loop Pressure), on a steam generator basis for Functions 10 (Steam Generator Startup Range Level), Function 12 (Auxiliary Feedwater Flow Rate), and Function 13 (Steam Generator Outlet Steam Pressure), and on a per core quadrant basis for Function 11 (Incore Thermocouples). This modifies the CTS by providing a specific allowance to enter the Action for each inoperable PAM instrumentation Function, for certain functions on a steam generator basis, for certain functions on a loop basis, and for certain functions on per quadrant basis.	3.3.17 ACTIONS Note	3.3.3.6 Action a
3.3.18 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.3.18	3.3.3.5.1, 3.3.3.5.2

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.18 A02	CTS 3.3.3.5.1 Action a provides the compensatory actions to take when remote shutdown monitoring instrumentation is inoperable and CTS 3.3.3.5.2 Action b provides the compensatory actions to take when a control circuit or transfer switch is inoperable. ITS 3.3.18 ACTIONS provide the compensatory actions for inoperable remote shutdown monitoring instrumentation Functions. The ITS 3.3.18 ACTIONS include a Note that allows separate Condition entry for each Function. This modifies the CTS by providing a specific allowance to enter the Action for each inoperable remote shutdown monitoring instrumentation Function and each control circuit and transfer switch Function.	3.3.18 ACTIONS Note	3.3.3.5.1 Action a, 3.3.3.5.2 Action b
3.4.1 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.4.1	3.2.5
3.4.1 A02	The CTS 3.2.5 Action requires the unit to reduce THERMAL POWER to "less than" 5% of RATED THERMAL POWER (RTP) within the next 4 hours if the DNB parameters are not restored to within limit in 2 hours. ITS 3.4.1 ACTION B requires the power reduction to MODE 2, which is less than or equal to 5% RTP, within the next 6 hours if the DNB parameters are not restored to within limit in 2 hours. This changes the CTS by allowing the unit be at 5% RTP instead of < 5% RTP. The change in the time period to reach 5% RTP is discussed in DOC L01.	3.4.1 ACTION B	3.2.5 Action
3.4.1 A03	CTS 3.2.5, Table 3.2-2, Note (3) states that the minimum required Table 3.2-2 measured RCS flow rates include a flow rate uncertainty of 2.5%, "and are based on a minimum of 52 lumped burnable poison rod assemblies in place in the core." ITS 3.4.1 does not include the reason for the values of the measured RCS flow rate limits. This changes the CTS by deleting the specific reason for the measured RCS flow rate	None	Table 3.2-2 Note 3

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	limit values. The change that moves the uncertainty value (2.5%) to the Bases is discussed in DOC LA01.		
3.4.2 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.4.2	3.1.1.4
3.4.2 A02	The CTS 3.1.1.4 Action states that with a Reactor Coolant System (RCS) operating loop temperature (Tavg) < 525°F, to "restore Tavg to within its limit within 15 minutes or be in HOT STANDBY within the next 15 minutes." ITS 3.4.2 ACTION A states that with Tavg in one or more RCS loops not within limit, be in MODE 2 with keff < 1.0 within 30 minutes. This changes the CTS by eliminating the redundant and unnecessary requirement to restore Tavg to within its limit within 15 minutes. The change associated with entering MODE 2 with keff < 1.0 instead of HOT STANDBY is discussed in DOC A03.	3.4.2 ACTION A	3.1.1.4 Action
3.4.2 A03	The CTS 3.1.1.4 Action states that with a Reactor Coolant System operating loop temperature (Tavg) < 525°F, to restore Tavg to within its limit within 15 minutes or be in "HOT STANDBY" within the next 15 minutes. ITS 3.4.2 ACTION A states that with Tavg in one or more RCS loops not within limit, be in "MODE 2 with keff < 1.0" within 30 minutes. This changes the CTS by requiring entry into MODE 2 with keff < 1.0 instead of entry into HOT STANDBY (MODE 3). The change associated with the time to be in HOT STANDBY is discussed in DOC A02.	3.4.2 ACTION A	3.1.1.4 Action
3.4.3 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with	3.4.3	3.4.9.1

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).		
3.4.3 A02	CTS 3.4.9.1 states that the RCS temperature and pressure shall be limited "during heatup, cooldown, criticality, and inservice leak and hydrostatic testing." CTS 3.4.9.1 is applicable at all times. ITS 3.4.3 states that the RCS pressure, RCS temperature, and RCS heatup and cooldown rates shall be maintained. ITS 3.4.3 is applicable at all times. This changes the CTS by eliminating the LCO requirements that the limits must be met only during heatup, cooldown, criticality, and inservice leak and hydrostatic testing.	3.4.3	3.4.9.1
3.4.3 A03	CTS 3.4.9.1 Action states that with any of the P/T limits exceeded, restore the temperature and/or pressure to within the limit within 30 minutes, perform an engineering evaluation to determine the effects of the out-of-limit condition on the integrity of the Reactor Coolant System, and determine that the Reactor Coolant System remains acceptable for continued operation. ITS 3.4.3 Conditions A and C are modified by a Note that requires the determination that the RCS is acceptable for continued operation be performed whenever the Condition is entered. This changes the CTS by explicitly stating that a determination that the RCS is acceptable for continued operation must be performed whenever the Condition is entered.	3.4.3 Conditions A and C Note	3.4.9.1 Action
3.4.3 A04	CTS 3.4.9.1 Action states, in part, that with any of the P/T limits exceeded, restore the temperature and/or pressure to within the limit within 30 minutes. ITS 3.4.3 ACTION C states that with the requirements of the LCO not met any time other than MODE 1, 2, 3, or 4, to immediately initiate action to restore the parameter(s) to within limits. This changes the CTS by requiring immediate action to restore P/T limits and continuing the action until complete, when the unit is in other than MODE 1, 2, 3, or 4.	3.4.3 ACTION C	3.4.9.1 Action
3.4.4	In the conversion of the Davis-Besse Current Technical Specifications	3.4.4	3.4.1.1

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
A01	(CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).		
3.4.4 A02	CTS 4.4.1.1.2.b requires a verification that the three reactor coolant pumps (RCPs) operating Reactor Protection System (RPS) trip setpoints for the High Flux and Flux-ΔFlux-Flow Functions are properly set prior to reactor criticality if the switch to three RCPs was made while not within the Applicability of CTS 3.4.1.1. This specific Surveillance is not maintained in the ITS. This changes the CTS by deleting the prior to criticality Surveillance.	None	4.4.1.1.2.b
3.4.4 A03	The CTS 3.4.1.1 includes a footnote stating "See Special Test Exception 3.10.3." ITS 3.4.4 Applicability does not contain the footnote or a reference to the Special Test Exception.	None	3.4.1.1 footnote *
3.4.5 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.4.5	3.4.1.2
3.4.5 A02	CTS 3.4.1.2.d states that the provisions of Specifications 3.0.3 and 3.0.4 are not applicable. ITS 3.4.5 does not include this exception. This changes the CTS by deleting the specific exception to Specifications 3.0.3 and 3.0.4.	None	3.4.1.2.d
3.4.5 A03	CTS 3.4.1.2 Action a states that when less than the required reactor coolant loops are OPERABLE, action must be immediately initiated to restore the required loops. CTS 3.4.1.2 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	3.4.5 ACTIONS A and C	3.4.1.2 Action a 3.4.1.2 Action b

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	<p>immediately initiated to return the required loop to operation. ITS 3.4.5 ACTION A specifies the Required Action for one required RCS loop inoperable. The Required Action is to restore the RCS loop to OPERABLE status within 72 hours. ITS 3.4.5 ACTION C specifies the Required Actions for two required RCS loops inoperable and for no required RCS loop in operation. The Required Actions are to immediately suspend operations that would cause introduction of coolant into the RCS with boron concentration less than required to meet the requirements of LCO 3.1.1, and to immediately initiate action to restore one RCS loop to OPERABLE status and operation. This changes the CTS by revising the Actions to immediately suspend operations that would cause introduction of coolant into the RCS with boron concentration less than required to meet the requirements of LCO 3.1.1 when two RCS loops are inoperable, and breaking up the Actions for one and two inoperable RCS loops into two separate Actions. The change to when one RCS loop is inoperable (change in time from immediately to 72 hours) is justified in Discussion of Change L01.</p>		
3.4.5 A04	<p>CTS LCO 3.4.1.2 Applicability Note * states that decay heat removal loops may not be used in MODE 3 to meet the LCO requirements, unless the primary side temperature and pressure are within the Decay Heat Removal System's design conditions. This Note is not included in the ITS. This changes the CTS by deleting the Applicability Note describing when decay heat removal loops can be used to meet the LCO requirements.</p>	None	3.4.1.2 Applicability Note *
3.4.6 A01	<p>In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).</p>	3.4.6	3.4.1.2

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.6 A02	CTS 3.4.1.2.d states that the provisions of Specifications 3.0.3 and 3.0.4 are not applicable. ITS 3.4.6 does not include this exception. This changes the CTS by deleting the specific exception to Specifications 3.0.3 and 3.0.4.	None	3.4.1.2.d
3.4.6 A03	CTS 3.4.1.2 Action a states that when less than the required reactor coolant loops are OPERABLE, action must be immediately initiated to restore the required loops. CTS 3.4.1.2 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 immediately initiated to return the required loop to operation. ITS 3.4.6 ACTION A specifies the Required Action for one required RCS loop inoperable. The Required Action is to immediately initiate action to restore the second RCS loop to OPERABLE status. ITS 3.4.6 ACTION B specifies the Required Actions for two required RCS loops inoperable and for no required RCS loop in operation. The Required Actions are to immediately suspend operations that would cause introduction of coolant into the RCS with boron concentration less than required to meet the requirements of LCO 3.1.1, and to immediately initiate action to restore one RCS loop to OPERABLE status and operation. This changes the CTS by revising the Actions to immediately suspend operations that would cause introduction of coolant into the RCS with boron concentration less than required to meet the requirements of LCO 3.1.1 when two RCS loops are inoperable and to break up the Actions for one and two inoperable RCS loops into two separate Actions.	3.4.6 ACTIONS A and B	3.4.1.2 Action a 3.4.1.2 Action b
3.4.6 A04	CTS 4.4.1.2.1 states that the required decay heat removal loop(s) shall be determined OPERABLE per Specification 4.0.5, the inservice testing Surveillance Requirements for ASME Code Class 1, 2, and 3 components. ITS 3.4.6 does not contain this explicit Surveillance Requirement. This changes the CTS by deleting the explicit requirement to perform the inservice testing Surveillance Requirements	None	4.4.1.2.1

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.7 A01	for ASME Code Class 1, 2, and 3 components. In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.4.7	3.4.1.2
3.4.7 A02	CTS 3.4.1.2.d states that the provisions of Specifications 3.0.3 and 3.0.4 are not applicable. ITS 3.4.7 does not include this exception. This changes the CTS by deleting the specific exception to Specifications 3.0.3 and 3.0.4.	None	3.4.1.2.d
3.4.7 A03	CTS 3.4.1.2 Action a states that when less than the required reactor coolant loops are OPERABLE, action must be immediately initiated to restore the required loops. CTS 3.4.1.2 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 immediately initiated to return the required loop to operation. ITS 3.4.7 ACTION A specifies the Required Actions when one of the two required loops is inoperable. Required Action A.1 is to immediately initiate action to restore the second loop to OPERABLE status. ITS 3.4.7 ACTION B specifies the Required Actions when two required loops are inoperable and when no required loop is in operation. The Required Actions are to immediately suspend operations that would cause introduction of coolant into the RCS with boron concentration less than required to meet the requirements of LCO 3.1.1, and to immediately initiate action to restore one loop to OPERABLE status and operation. This changes the CTS by revising the Actions to immediately suspend operations that would cause introduction of coolant into the RCS with boron concentration less than required to meet the requirements of LCO 3.1.1 when two required loops are inoperable and to break up the Actions for	3.4.7 ACTIONS A and B	3.4.1.2 Action a 3.4.1.2 Action b

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.7 A04	one and two inoperable required loops into two separate Actions. CTS 3.4.1.2 footnote * states the decay heat removal (DHR) loops normal or emergency power may be inoperable in MODE 5. ITS 3.4.7 has not retained this specific footnote allowance. This changes the CTS by deleting a specific footnote allowance concerning power supplies.	None	3.4.1.2 footnote *
3.4.7 A05	CTS 4.4.1.2.1 states that the required decay heat removal loop(s) shall be determined OPERABLE per Specification 4.0.5, the inservice testing Surveillance Requirements for ASME Code Class 1, 2, and 3 components. ITS 3.4.7 does not contain this explicit Surveillance Requirement. This changes the CTS by deleting the explicit requirement to perform the inservice testing Surveillance Requirements for ASME Code Class 1, 2, and 3 components.	None	4.4.1.2.1
3.4.7 A06	CTS 4.4.1.2.2, in part, specifies the steam generator water level requirements for when the reactor coolant pumps (RCPs) are not operating. ITS LCO 3.4.7 and SR 3.4.7.2 provide the same steam generator water level requirements, but do not state that this level is for when the RCPs are not operating. This changes the CTS by deleting the amplifying information that the RCPs are not operating.	3.4.7 SR 3.4.7.2	4.4.1.2.2
3.4.7 A07	CTS 3.4.1.2 includes all MODE 5 coolant loop requirements in one Specification. ITS 3.4.7 includes only the MODE 5, Loops Filled requirements. The MODE 5, Loops Not Filled requirements are included in ITS 3.4.8. This changes the CTS by splitting the MODE 5 requirements into two Specifications.	3.4.7	3.4.1.2
3.4.8 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.4.8	3.4.1.2

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.8 A02	CTS 3.4.1.2.d states that the provisions of Specifications 3.0.3 and 3.0.4 are not applicable. ITS 3.4.8 does not include this exception. This changes the CTS by deleting the specific exception to Specifications 3.0.3 and 3.0.4.	None	3.4.1.2.d
3.4.8 A03	CTS 3.4.1.2 includes all MODE 5 coolant loop requirements in one Specification. ITS 3.4.8 includes only the MODE 5, Loops Not Filled requirements. The MODE 5, Loops Filled requirements are included in ITS 3.4.7. This changes the CTS by splitting the MODE 5 requirements into two Specifications.	3.4.8	3.4.1.2
3.4.8 A04	CTS 3.4.1.2 Action a states that when less than the required reactor coolant loops are OPERABLE, action must be immediately initiated to restore the required loops. CTS 3.4.1.2 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 immediately initiated to return the required loop to operation. ITS 3.4.8 ACTION A specifies the Required Actions when one of the two required DHR loops is inoperable. Required Action A.1 is to immediately initiate action to restore the DHR loop to OPERABLE status. ITS 3.4.8 ACTION B specifies the Required Actions when two required DHR loops are inoperable and when no required DHR loop is in operation. The Required Actions are to immediately suspend operations that would cause introduction of coolant into the RCS with boron concentration less than required to meet the requirements of LCO 3.1.1, and to immediately initiate action to restore one DHR loop to OPERABLE status and operation. This changes the CTS by revising the Actions to immediately suspend operations that would cause introduction of coolant into the RCS with boron concentration less than required to meet the requirements of LCO 3.1.1 when two required DHR loops are inoperable and to break up the Actions for one and two inoperable required DHR loops into two separate Actions.	3.4.8 ACTIONS A and B	3.4.1.2.Action a 3.4.1.2 Action b

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.8 A05	CTS 3.4.1.2 footnote * states the decay heat removal (DHR) loops normal or emergency power may be inoperable in MODE 5. ITS 3.4.8 has not retained this specific footnote allowance. This changes the CTS by deleting a specific footnote allowance concerning power supplies.	None	3.4.1.2 footnote *
3.4.8 A06	CTS 4.4.1.2.1 states that the required decay heat removal loop(s) shall be determined OPERABLE per Specification 4.0.5, the inservice testing Surveillance Requirements for ASME Code Class 1, 2, and 3 components. ITS 3.4.8 does not contain this explicit Surveillance Requirement. This changes the CTS by deleting the explicit requirement to perform the inservice testing Surveillance Requirements for ASME Code Class 1, 2, and 3 component.	None	4.4.1.2.1
3.4.9 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS)	3.4.9	3.4.4
3.4.9 A02	CTS 3.4.4.a states that the pressurizer shall be OPERABLE with a steam bubble. ITS 3.4.9 does not retain this requirement. This changes the CTS by not specifically requiring the pressurizer to be OPERABLE with a steam bubble.	None	3.4.4.a
3.4.9 A03	CTS 3.4.4 Action states that if the inoperable pressurizer is not restored to OPERABLE status within the allowed time, to be in HOT STANDBY (MODE 3) with the control rod drive trip breakers open within the next 6 hours. Under similar conditions, ITS 3.4.9 ACTION B states to be in MODE 3 within 6 hours and in MODE 4 within 12 hours. This changes the CTS by eliminating the requirement to open the control rod drive trip breakers. The change associated with entering MODE 4 is discussed in DOC M02.	3.4.9 ACTION B	3.4.4 Action

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.10 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.4.10	3.4.3
3.4.11 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.4.11	3.4.3
3.4.12 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.4.12	3.4.2
3.4.13 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.4.13	3.4.6.2
3.4.14 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.4.14	3.4.6.2 Table 3.3-3 Functional Unit 5.a, including Action 13 Table 3.3-4 Table 4.3-2

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
			Functional Unit 5.a 4.5.2.d.1
3.4.14 A02	CTS 3.4.6.2 Actions b and c specify the compensatory actions to take when the leakage through any RCS PIV(s) is greater than the specified limit. ITS 3.4.14 ACTIONS A and B also state the appropriate compensatory actions under the same condition; however, ITS 3.4.14 ACTIONS Note 1 has been added. ITS 3.4.14 ACTIONS Note 1 allows separate Condition entry for each RCS PIV flow path. This changes the CTS by explicitly stating that the Actions are to be taken separately for each inoperable RCS PIV flow path.	3.4.14 ACTIONS Note 1	3.4.6.2 Actions b and c
3.4.14 A03	CTS 3.4.6.2 Actions b and c specify the compensatory actions to take when the leakage through any RCS PIV(s) is greater than the specified limit. ITS 3.4.14 ACTIONS A and B also state the appropriate compensatory actions under the same condition; however, ITS 3.4.14 ACTIONS Note 2 has been added. ITS 3.4.14 ACTIONS Note 2 states "Enter applicable Conditions and Required Actions for systems made inoperable by an inoperable RCS PIV." This changes the CTS by explicitly stating that the Conditions and Required Actions for systems made inoperable by an inoperable RCS PIV must be entered.	3.4.14 ACTIONS Note 2	3.4.6.2 Actions b and c
3.4.14 A04	CTS Table 3.3-3 requires one channel of the decay heat isolation valve interlock to be OPERABLE. This channel is the channel common to the Safety Features Actuation System (SFAS) instrumentation, and it provides a interlock signal to one of the two isolation valves. The other channel that provides an interlock signal to the decay heat isolation valve is not common to SFAS instrumentation. This channel is covered by CTS 4.5.2.d.1, which requires interlock testing for the two decay heat isolation valves (DH-11 and DH-12). ITS 3.4.14 is combining these two requirements into a single LCO. ITS LCO 3.4.14 part 2 requires the Decay Heat Removal (DHR) System interlock function to be OPERABLE. This changes the CTS by combining the requirements for	LCO 3.4.14 part 2	Table 3.3-3 Functional Unit 5.a 4.5.2.d.1

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.14 A05	the interlock function into a single LCO. CTS Table 3.3-3, Functional Unit 5.a (Decay Heat Isolation Valve) includes a Note # that applies to Action 13 and states the provisions of Specification 3.0.4 are not applicable. ITS 3.4.14 does not include this Note. This changes the CTS by deleting the specific exception to Specification 3.0.4.	None	CTS Table 3.3-3 Functional Unit 5.a Note #
3.4.15 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.4.15	3.4.6.1 Table 3.3-6 Instruments 2.a and 2.b, including Action 21 Table 4.3-3 Instruments 2.a and 2.b
3.4.16 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.4.16	3.4.8
3.4.16 A02	CTS 3.4.8 Action a (MODES 1, 2, 3, 4, and 5) and CTS Table 4.4-4, Footnote #, require the isotopic analysis for iodine to be performed until the specific activity of the primary coolant system is restored to within limits. ITS 3.4.16 Required Action A.1 requires this same analysis, however the explicit statement to perform the isotopic analysis for iodine until the limits are met has been deleted. This changes the CTS by deleting the explicit statement to perform the isotopic analysis for iodine until the limits are met.	3.4.16 Required Action A.1	3.4.8 Action a Table 4.4-4 footnote #
3.4.16 A03	CTS 3.4.8 Action a (MODES 1, 2, 3, 4, and 5) provides a cross-reference to CTS 6.9.1.5.c, the Annual Operating Report. ITS 3.4.16	None	3.4.8 Action a

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	does not contain this cross-reference. This changes the CTS by deleting a cross-reference to another CTS requirement.		
3.4.17 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.4.17	3.4.5
3.5.1 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.5.1	3.5.1
3.5.1 A02	CTS 3.5.1 requires "each" reactor coolant system core flooding tank (CFT) to be OPERABLE. ITS LCO 3.5.1 requires "two" CFTs to be OPERABLE. This changes the CTS by specifying the exact number of ECCS CFTs required to be OPERABLE.	3.5.1	3.5.1
3.5.1 A03	CTS 3.5.1 does not contain a specific ACTION for two CFTs inoperable. With two CFTs inoperable, CTS 3.0.3 would be entered. ITS 3.5.1 ACTION D directs entry into LCO 3.0.3 when two CFTs are inoperable. This changes the CTS by specifically stating to enter LCO 3.0.3 in this System Specification.	3.5.1 ACTION D	3.5.1 Actions 3.0.3
3.5.2 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.5.2	3.5.2
3.5.2	CTS 3.5.2 Action a states that when one High Pressure Injection (HPI)	3.5.2 ACTION D	3.5.2 Actions a and

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
A02	<p>train is inoperable, it must be returned to OPERABLE status within 72 hours. CTS Action b states that when one Low Pressure Injection (LPI) train or its associated decay heat removal cooler is inoperable, it must be returned to OPERABLE status within 7 days. CTS 3.5.3 does not contain specific actions if there is less than 100% of the ECCS flow equivalent to a single OPERABLE train available (i.e., two HPI subsystems or two LPI subsystems inoperable). Thus a CTS 3.0.3 entry would be required. ITS 3.5.2 ACTION D directs entry into ITS LCO 3.0.3 when there is less than 100% of the ECCS flow equivalent to a single OPERABLE train available. This changes the CTS by specifically stating to enter ITS LCO 3.0.3 in this Specification.</p>		<p>b 3.0.3</p>
3.5.2 A03	<p>CTS LCO 3.5.2.a and Applicability footnote * states that an exception applies to the HPI pumps for the purpose of conducting Restart Test Plant inspection activities. This exception is valid during the ongoing Thirteenth Refueling Outage for entries into MODE 3 from MODE 4. Under this exception, neither HPI train is required to be capable of taking suction from the LPI trains when aligned for containment sump recirculation. The HPI trains will otherwise be OPERABLE. Operation in MODE 1 or MODE 2 while relying upon the provisions of this exception is prohibited. ITS 3.5.2 does not retain this footnote. This changes the CTS by deleting this footnote, which applies only to the thirteenth refueling outage.</p>	None	3.5.2.a and Applicability footnote *
3.5.2 A04	<p>CTS 4.5.2.d.2.b) requires verification that on a Borated Water Storage Tank (BWST) Low – Low Level interlock trip, with the motor operators for the BWST outlet isolation valves and the containment emergency sump recirculation valves energized, the BWST Outlet Valve HV-DH7A (HV-DH7B) automatically close in < 75 seconds after the operator manually pushes the control switch to open the Containment Emergency Sump Valve HV-DH9A (HV-DH9B) which should be verified to open in < 75 seconds. ITS SR 3.5.2.8 requires the same Surveillance, however the exception statement "with the motor</p>	LCO 3.5.2 Note	4.5.2.d.2.b)

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	operators for the BWST outlet isolation valves and the containment emergency sump recirculation valves energized" has been moved to the LCO as a Note. The LCO Note states "The borated water storage tank (BWST) outlet and containment emergency sump valves may be considered OPERABLE when the associated valve motors are de-energized, provided the valves are not otherwise inoperable." This changes the CTS by moving the location of the exception from the specific Surveillance to the LCO statement.		
3.5.3 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.5.3	3.5.3
3.5.3 A02	The ITS 3.5.3 ACTIONS include a Note that states LCO 3.0.4.b is not applicable to the ECCS low pressure injection (LPI) subsystem. CTS 3.5.3 does not include this Note. This changes the CTS by including the ACTION Note.	3.5.3 ACTIONS Note	3.5.3
3.5.3 A03	CTS 4.5.3 states that ECCS subsystem shall be demonstrated OPERABLE per the applicable Surveillance Requirements of 4.5.2. ITS SR 3.5.3.1 states the specific Surveillances of ITS 3.5.2 that must be performed. This changes the CTS by clearly stating the SRs to perform.	SR 3.5.3.1	4.5.3
3.5.3 A04	CTS 4.5.3 states that ECCS subsystem shall be demonstrated OPERABLE per the applicable Surveillance Requirements of 4.5.2. One of the Surveillance Requirements is CTS 4.5.2.d.2.b), which requires verification that on a Borated Water Storage Tank (BWST) Low – Low Level interlock trip, with the motor operators for the BWST outlet isolation valves and the containment emergency sump recirculation valves energized, the BWST Outlet Valve HV-DH7A (HV	LCO 3.5.3 Note	4.5.3 4.5.2.d.2.b)

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	<p>DH7B) automatically close in < 75 seconds after the operator manually pushes the control switch to open the Containment Emergency Sump Valve HV DH9A (HV-DH9B) which should be verified to open in < 75 seconds. ITS SR 3.5.2.8 requires the same Surveillance, and is now specified in ITS SR 3.5.3.1, as justified in Discussion of Change (DOC) A03. However the exception statement "with the motor operators for the BWST outlet isolation valves and the containment emergency sump recirculation valves energized" is not included in ITS SR 3.5.2.8, and has been moved to LCO 3.5.2 as a Note. This is justified in ITS 3.5.2 DOC A04. Thus, the same Note needs to be included in ITS 3.5.3. The LCO 3.5.3 Note states "The borated water storage tank (BWST) outlet and containment emergency sump valves may be considered OPERABLE when the associated valve motors are de-energized, provided the valves are not otherwise inoperable." This changes the CTS by moving the location of the exception from the specific Surveillance to the LCO statement.</p>		
3.5.4 A01	<p>In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).</p>	3.5.4	3.5.4
3.6.1 A01	<p>In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).</p>	3.6.1	3.6.1.1 1.8.a, b, d, and e 3.6.1.2
3.6.1 A02	<p>CTS 3.6.1.1 states "Primary CONTAINMENT INTEGRITY shall be maintained." CTS 3.6.1.2 requires containment leakage rates be in</p>	3.6.1	3.6.1.1 3.6.1.2

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	accordance with the Containment Leakage Rate Testing Program. ITS 3.6.1 states "Containment shall be OPERABLE." This changes the CTS by deleting all references to the CONTAINMENT INTEGRITY definition, as well as combining the containment requirements of CTS 3.6.1.1 and CTS 3.6.1.2 into one LCO statement.		
3.6.1 A03	CTS 4.6.1.1.b requires that Primary CONTAINMENT INTEGRITY shall be demonstrated by verifying that each containment air lock is in compliance with the requirements of Specification 3.6.1.3. The ITS does not include the reference to CTS 3.6.1.3 (which has changed to ITS 3.6.2). This changes the CTS by not including a reference to another LCO that is required in the same MODES.	None	4.6.1.1.b
3.6.2 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.6.2	3.6.1.3 1.8.c
3.6.2 A02	CTS 3.6.1.3 states "Each containment air lock shall be OPERABLE..." CTS 3.6.1.3 Action a states "With an air lock inoperable" and specifies Actions to be taken. ITS 3.6.2 ACTIONS Note 2 states "Separate Condition entry is allowed for each air lock." ITS 3.6.2 Condition C states "One or more containment air locks inoperable for reasons other than Condition A or B." This changes the CTS by clarifying the current intent of applying the CTS Actions to each air lock separately.	3.6.2 ACTIONS Note 2 3.6.2 Condition C	3.6.1.3 3.6.1.3 Action a
3.6.2 A03	CTS 3.6.1.3 does not include a reference to entering applicable Conditions and Required Actions of the CONTAINMENT INTEGRITY LCO (CTS 3.6.1.1) (changed to containment OPERABILITY in the ITS). ITS 3.6.2 ACTIONS Note 3 states "Enter applicable Conditions and Required Actions of LCO 3.6.1, "Containment," when air lock leakage results in exceeding the overall containment leakage rate." This	3.6.2 ACTIONS Note 3	3.6.1.3

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	changes the CTS by explicitly requiring the Containment Specification Actions be entered when the Containment LCO is not met as a result of air lock leakage exceeding limits.		
3.6.2 A04	CTS 3.6.1.3 Action a addresses one inoperable containment air lock door or an inoperable interlock mechanism. CTS 3.6.1.3 Action b addresses an inoperable containment air lock for reasons other than an inoperable air lock door or interlock mechanism, which includes both air lock doors in one air lock being inoperable. Note 1 to both ITS 3.6.2 ACTIONS A and B states that none of the Required Actions of ACTIONS A and B are to be taken if both doors in the same air lock are inoperable and Condition is entered. This changes CTS by adding a Note to clarify that when both doors in an air lock are inoperable, the Actions for one inoperable door are not to be taken.	3.6.2 ACTIONS A and B Note 1	3.6.1.3 Actions a and b
3.6.2 A05	CTS 3.6.1.3 Action a.3 includes a requirement that states operation with an inoperable air lock door or interlock mechanism can continue "provided that the containment air lock passes each scheduled performance of the overall air lock leakage rate test." ITS 3.6.2 does not include this specific statement. This changes the CTS by deleting a provision when a door or interlock mechanism is inoperable.	None	3.6.1.3 Action a.3
3.6.2 A06	CTS 4.6.1.3.a requires air lock leakage rate testing in accordance with the Containment Leakage Rate Testing Program. ITS SR 3.6.2.1 requires a similar test, but is modified by Note 2, which states that results shall be evaluated against acceptance criteria applicable to SR 3.6.1.1. This changes the CTS by adding a Note as a reminder that the air lock leakage must be accounted for in determining the combined Type B and C containment leakage rate.	SR 3.6.2.1 Note 2	4.6.1.3.a
3.6.3 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with	3.6.3	3.6.3.1 3.6.1.1 3.6.1.2 3.6.1.7

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).		6.16.d.1) and 2)
3.6.3 A02	CTS 3.6.3.1 and CTS 3.6.1.7 Actions provide requirements to be taken for each containment isolation valve that is inoperable. The ITS includes an explicit Note (ACTIONS Note 2) that provides instructions for the proper application of the ACTIONS for ITS compliance (i.e., Separate Condition entry is allowed for each penetration flow path). This changes the CTS by providing explicit direction as to how to utilize the ACTIONS when a containment isolation valve is inoperable.	3.6.3 ACTIONS Note 2	3.6.3.1 Actions 3.6.1.7 Actions
3.6.3 A03	CTS 3.6.3.1 does not specifically require Conditions to be entered for systems supported by inoperable containment isolation valves. OPERABILITY of supported systems is addressed through the definition of OPERABILITY for each system, and appropriate LCO Actions are taken. ITS 3.6.3 ACTIONS Note 3 states "Enter applicable Conditions and Required Actions for system(s) made inoperable by containment isolation valves." ITS LCO 3.0.6 provides an exception to ITS LCO 3.0.2, stating "When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered." This changes the CTS by adding a specific statement to require supported system Conditions and Required Actions be entered, whereas in the CTS this would be done without the Note.	3.6.3 ACTIONS Note 3	3.6.3.1
3.6.3 A04	CTS 3.6.3.1 does not include a reference to entering applicable Actions of the CONTAINMENT INTEGRITY LCO (CTS 3.6.1.1) (changed to containment OPERABILITY in the ITS). ITS 3.6.3 ACTIONS Note 4 states "Enter applicable Conditions and Required Actions of LCO 3.6.1, "Containment," when isolation valve leakage results in exceeding the overall containment leakage rate acceptance criteria." This changes the CTS by explicitly stating an existing requirement that the	3.6.3 ACTIONS Note 4	3.6.3.1

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	Containment Specification Actions be taken when the Containment LCO is not met as a result of containment isolation valve leakage exceeding limits.		
3.6.3 A05	When one or more of the containment isolation valves are inoperable, CTS 3.6.3.1 Action a requires restoring the inoperable valve(s) to OPERABLE status within 4 hours or taking one of the other specified compensatory actions. ITS 3.6.3 does not state the requirement to restore an inoperable isolation valve to OPERABLE status, but includes other compensatory Required Actions to take within 4 hours or 72 hours, as applicable. This changes the CTS by not explicitly stating the requirement to restore an inoperable valve to OPERABLE status. The change in the time allowed to meet the compensatory Required Action (4 hours and 72 hours) is discussed in DOCs M01 and L01.	3.6.3 ACTIONS A and C	3.6.3.1 Action a
3.6.3 A06	CTS 3.6.3.1 Actions b and c provide the actions for inoperable containment isolation valves and include Note **, which states that the provisions of Specification 3.0.4 are not applicable. ITS 3.6.3 does not include this Note. This changes the CTS by deleting the specific exception to Specification 3.0.4.	None	3.6.3.1 Actions b and c Note **
3.6.3 A07	CTS 3.6.3.1 Actions b and c Note ** states that selected valves may be opened on an intermittent basis under administrative control. However, the CTS Note does not specifically define what are "selected" valves. ITS 3.6.3 ACTIONS Note 1 states that penetration flow paths "except for 48 inch purge and exhaust valve penetration flow paths" may be unisolated intermittently under administrative controls. This changes the CTS by specifically delineating which containment isolation valves cannot utilize the CTS Note allowance.	3.6.3 ACTIONS Note 1	3.6.3.1 Actions b and c Note **
3.6.3 A08	CTS 4.6.3.1.3 requires the isolation time of each power operated or automatic containment isolation valve be determined to be within its limit when tested pursuant to Specification 4.0.5. ITS SR 3.6.3.5 requires verifying the isolation time of each automatic power operated	SR 3.6.3.5	4.6.3.1.3

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	containment isolation valve is within limits in accordance with the Inservice Testing Program. This changes the CTS by stating that the Frequency is in accordance with the Inservice Testing Program, in lieu of Specification 4.0.5. The change to the valves being tested is discussed in DOC L04.		
3.6.3 A09	CTS 3.6.1.7 provides additional requirements for the containment purge and exhaust valves, above those required in the Containment Isolation Valve Specification, CTS 3.6.3.1. The ITS combines these two CTS Specifications into one Specification, ITS 3.6.3. This changes the CTS by deleting the specific LCO statement for containment purge and exhaust valves and combines it into the Containment Isolation Valve Specification.	3.6.3	3.6.1.7
3.6.4 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.6.4	3.6.1.4
3.6.5 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.6.5	3.6.1.5
3.6.6 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.6.6	3.6.2.1 3.6.2.2

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.6 A02	The CTS 3.6.2.1 Action provides the actions when one containment spray train is inoperable and the CTS 3.6.2.2 Action provides the actions when one containment cooling train is inoperable. However, no specific actions are provided when both a containment spray train and a containment cooling train are inoperable. ITS 3.6.6 ACTION D limits the time one containment spray train and one containment air cooling train are concurrently inoperable to 72 hours. This changes the CTS by specifically delineating the actions when a containment spray train and a containment air cooling train are concurrently inoperable	3.6.6 ACTION D	3.6.2.1 Action 3.6.2.2 Action
3.6.6 A03	CTS 3.6.2.1 does not provide an Action for two containment spray trains inoperable and CTS 3.6.2.2 does not provide an Action for two containment cooling trains inoperable. Thus, CTS LCO 3.0.3 would be required to be entered. In addition, CTS 3.6.2.1 nor CTS 3.6.2.2 provide an Action for any combination of three or more containment spray and containment cooling trains inoperable. Thus, CTS LCO 3.0.3 would also be required to be entered when this occurs. ITS 3.6.6 ACTION G requires immediate entry into ITS LCO 3.0.3 when two containment spray trains are inoperable or any combination of three required containment spray and air cooling trains are inoperable. This changes the CTS by providing a specific ACTION for two inoperable containment spray trains and for any combination of three required inoperable containment spray and containment air cooling trains.	3.6.6 ACTION G	3.6.2.1 Action 3.6.2.2 Action 3.0.3
3.6.7 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS)	3.6.7	3.5.2 4.5.2.d.4
3.7.1 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS),	3.7.1	3.7.1.1

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).		
3.7.1 A02	CTS 3.7.1.1 Action a states, in part, that when one or more MSSVs are inoperable, within 4 hours restore the inoperable valve to OPERABLE status or reduce the High Flux Trip Setpoint in accordance with the requirements of Equation 3.7-1. ITS 3.7.1 ACTIONS Note states "Separate Condition entry is allowed for each MSSV." This changes the CTS by explicitly specifying separate condition entry for each inoperable MSSV.	3.7.1 ACTIONS Note	3.7.1.1 Action a
3.7.1 A03	CTS 3.7.1.1 Action a states, in part, that with one or more MSSVs inoperable to either restore the inoperable valve to OPERABLE status or to take an alternate, compensatory measure. ITS 3.7.1 ACTION A does not include the restoration requirement, only the alternate compensatory measure is provided. This changes the CTS by eliminating the explicit statement to restore the inoperable MSSV to OPERABLE status.	3.7.1 ACTION A	3.7.1.1 Action a
3.7.1 A04	CTS 3.7.1.1 does not identify the OPERABILITY lift settings for the MSSVs nor the total number of required MSSVs. CTS 3.7.1.1 only states that all MSSVs shall be OPERABLE. ITS Table 3.7.1-1 identifies the total number of MSSVs, the lift setting for each of the MSSVs and that the lift settings for OPERABILITY are + 3% of the nominal lift setting. Furthermore, ITS SR 3.7.1.1 states that after testing, the lift setting shall be + 1%. This changes the CTS by clearly stating the required number of MSSVS and their OPERABILITY lift settings.	Table 3.7.1-1 SR 3.7.1.1	3.7.1.1
3.7.1 A05	CTS 3.7.1.1 Action c states that the provisions of Specification 3.0.4 are not applicable. ITS 3.7.1 does not include this specific exception. This changes the CTS by deleting the specific exception to Specification 3.0.4.	None	3.7.1.1 Action c

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.1 A06	CTS 4.7.1.1 requires the MSSV lift setpoints to be verified in accordance with Specification 4.0.5, the Inservice Testing Program requirements. The Davis-Besse Inservice Testing Program requires this test to be performed in MODES 1, 2, or 3. ITS SR 3.7.1.1 requires verification of each MSSV lift setpoint in accordance with the Inservice Testing Program. In addition, the Note to SR 3.7.1.1 states that the Surveillance is only required to be performed in MODES 1 and 2. This changes the CTS by explicitly stating that the unit can transition from MODE 4 to MODE 3 without requiring the lift setpoints of the MSSVs to be verified (i.e., the Surveillance to be performed).	SR 3.7.1.1	4.7.1.1
3.7.2 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.7.2	3.7.1.5 3.6.3.1
3.7.2 A02	CTS 3.7.1.5 Action MODE 2 and 3 states that the provisions of Specification 3.0.4 are not applicable. ITS 3.7.2 does not include this specific exception. This changes the CTS by deleting the specific exception to Specification 3.0.4.	None	3.7.1.5 Action MODE 2 and 3
3.7.2 A03	CTS 4.7.1.5 requires each MSIV to be demonstrated OPERABLE "per the requirements of Specification 3.3.2.2." Specification 3.3.2.2 provides the requirements for the Steam and Feedwater Rupture Control System (SFRCS) Instrumentation. CTS 4.3.2.2.3 requires a SFRCS RESPONSE TIME test, and footnote *, in part, describes how the MSIV closure portion of the SFRCS RESPONSE TIME is to be measured. Thus, the CTS 4.7.1.5 requirement is referencing the MSIV closure time requirement. ITS SR 3.7.2.1 requires verification that the isolation time of each MSIV is within limits. This changes the CTS by explicitly stating the MSIV testing requirement in the MSIV Specification.	SR 3.7.2.1	4.7.1.5 4.3.2.2.3

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.2 A04	CTS 3.6.3.1 requires the containment isolation valves to be OPERABLE with isolation times less than or equal to required isolation times. However, CTS 3.7.1.5 also requires the MSIVs to be OPERABLE. ITS 3.7.2 requires the MSIVs to be OPERABLE and ITS SR 3.7.2.1 requires the MSIVs isolation time to be within limits. This changes the CTS by placing the MSIVs into a single Specification.	3.7.2 SR 3.7.2.1	3.6.3.1 3.7.1.5
3.7.2 A05	CTS 3.6.3.1 Action c provides the actions for inoperable MSIVs and includes Note **, which states that the provisions of Specification 3.0.4 are not applicable. ITS 3.7.2 does not include this Note. This changes the CTS by deleting the specific exception to Specification 3.0.4.	None	3.6.3.1 Action c note **
3.7.3 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.7.3	3.7.1.8 3.6.3.1
3.7.3 A02	CTS 3.7.1.8 Action states, in part, that when one or more MFCVs or SFCVs are inoperable, to isolate the affected flowpath. CTS 3.6.3.1 Action states, in part, that when one or more isolation valves are inoperable, to isolate the affected penetration. ITS 3.7.3 ACTIONS Note states "Separate Condition entry is allowed for each MFSV, MFCV, and SFCV." This changes the CTS by explicitly specifying separate condition entry for each inoperable MFSV, MFCV, and SFCV.	3.7.3 ACTIONS Note	3.7.1.8 Action 3.6.3.1 Action
3.7.3 A03	CTS 4.7.1.8 requires each MFCV and SFCV be demonstrated OPERABLE "by performance of Surveillance Requirement 4.3.2.2.3." Specification 3.3.2.2 provides the requirements for the Steam and Feedwater Rupture Control System (SFRCS) Instrumentation. CTS 4.3.2.2.3 requires a SFRCS RESPONSE TIME test once per REFUELING INTERVAL (i.e., every 24 months). Thus, the CTS 4.7.1.8 requirement is referencing the MFCV and SFCV closure time	SR 3.7.3.2	4.7.1.8 4.3.2.2.3

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	requirement. ITS SR 3.7.3.2 requires verification that the isolation time of each MFCV and SFCV is within limits every 24 months. This changes the CTS by explicitly stating the MFCV and SFCV testing requirement in the MFCV and SFCV Specification.		
3.7.3 A04	CTS 3.6.3.1 requires the containment isolation valves to be OPERABLE with isolation times less than or equal to required isolation times. ITS 3.7.3, in part, requires the MFSVs to be OPERABLE, and ITS SR 3.7.3.1 requires the MFSVs isolations time to be within limits. This changes the CTS by placing the MFSVs into a Specification with the other main feedwater isolation valves (MFIVs); i.e., the MFCVs and SFCVs.	3.7.3 SR 3.7.3.1	3.6.3.1
3.7.3 A05	When one or more of the MFSVs are inoperable, CTS 3.6.3.1 Action a requires restoring the inoperable valve(s) to OPERABLE status within 4 hours or taking one of the other specified compensatory actions. ITS 3.7.3 does not state the requirement to restore an inoperable isolation valve to OPERABLE status, but includes other compensatory Required Actions to take within 72 hours or 8 hours, as applicable. This changes the CTS by not explicitly stating the requirement to restore an inoperable valve to OPERABLE status. The change in the time allowed to meet the compensatory Required Actions (72 hours and 8 hours) is discussed in DOC L03).	3.7.3	3.6.3.1 Action a
3.7.3 A06	CTS 3.6.3.1 Action c provides the actions for inoperable MFSVs and includes Note **, which states that the provisions of Specification 3.0.4 are not applicable. ITS 3.7.3 does not include this Note. This changes the CTS by deleting the specific exception to Specification 3.0.4.	None	3.6.3.1 Action c Note **
3.7.4 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock	3.7.4	3.7.1.9

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	and Wilcox Plants" (ISTS).		
3.7.4 A02	CTS 3.7.1.9 Action states, in part, that when one or more turbine stop valves (TSVs) are inoperable, close the inoperable valve(s) within 8 hours and verify that the valve(s) are closed once per 7 days. ITS 3.7.4 ACTIONS Note states "Separate Condition entry is allowed for each TSV." This changes the CTS by explicitly specifying separate condition entry for each inoperable TSV.	3.7.4 ACTIONS Note	3.7.1.9 Action
3.7.4 A03	CTS 4.7.1.9 requires each TSV be demonstrated OPERABLE "by performance of Surveillance Requirement 4.3.2.2.3." Specification 3.3.2.2 provides the requirements for the Steam and Feedwater Rupture Control System (SFRCS) Instrumentation. CTS 4.3.2.2.3 requires a SFRCS RESPONSE TIME test, and footnote *, in part, describes how the TSV closure portion of the SFRCS RESPONSE TIME is to be measured. Thus, the CTS 4.7.1.9 requirement is referencing the TSV closure time requirement. ITS SR 3.7.4.1 requires verification that the isolation time of each TSV is within limits. This changes the CTS by explicitly stating the TSV testing requirement in the TSV Specification	SR 3.7.4.1	4.7.1.9 4.3.2.2.3
3.7.5 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.7.5	3.7.1.2 3.7.1.7
3.7.5 A02	The ITS 3.7.5 ACTIONS include a Note that states LCO 3.0.4.b is not applicable when entering MODE 1. CTS 3.7.1.2 and CTS 3.7.1.7 do not include this Note. This changes the CTS by including the ACTION Note.	3.7.5 ACTIONS Note	None
3.7.5 A03	CTS 4.7.1.7.c requires performance of a MDFP train functional test (i.e., verify it can be started and properly operated) at least once per 92 days	SR 3.7.5.7	4.7.1.7.c 4.7.1.7.d.1

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	<p>"and prior to entry into MODE 3 from MODE 4 (if not performed in the past 92 days)." CTS 4.7.1.7.d.1 requires verification at least once each refueling interval (24 months) that there is a flow path between the Motor Driven Feedwater Pump System and the Auxiliary Feedwater System by pumping the water from the Condensate Storage Tanks to the steam generators. It further states it must be performed prior to entering MODE 3 from MODE 4. CTS 4.7.1.7.f requires the same test as CTS 4.7.1.7.d.1 following a COLD SHUTDOWN greater than 30 days, and includes the same stipulation that it must be performed prior to entering MODE 3 from MODE 4. ITS SR 3.7.5.7 requires the same Surveillance test, but does not include the "prior to entering MODE 3 from MODE 4" stipulation. This changes the CTS by deleting the statements "prior to entry into MODE 3 from MODE 4 (if not performed in the past 92 days)" and "prior to entry into MODE 3 from MODE 4."</p>		4.7.1.7.f
3.7.6 A01	<p>In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS)</p>	3.7.6	3.7.1.3
3.7.6 A02	<p>The CTS 3.7.1.3 Actions provide two compensatory actions for when the CSTs are found to be inoperable. CTS 3.7.1.3 Action a allows four hours to restore the CSTs to OPERABLE status or be in MODE 4 within the next 12 hours. CTS 3.7.1.3 Action b alternatively allows 4 hours to demonstrate the OPERABILITY of the Service Water System as a backup supply to the Auxiliary Feedwater System and restore the CSTs to OPERABLE status within 7 days or be in MODE 4 within the next 12 hours. ITS 3.7.6 Required Action A.1 requires the verification by administrative means of an OPERABLE backup water supply at a Completion Time of 4 hours and once per 12 hours thereafter and Required Action A.2 requires the CSTs to be restored to OPERABLE</p>	3.7.6 ACTION A	3.7.1.3 Action a

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	status within 7 days. This changes the CTS by deleting the alternative requirement in CTS 3.7.1.3 Action a to restore the CSTs to OPERABLE status within 4 hours.		
3.7.6 A03	CTS 4.7.1.3.1 states that the CSTs shall be demonstrated OPERABLE at least once per 12 hours by verifying the water level is within its limits when the tank is the supply source for the Auxiliary Feedwater System. ITS SR 3.7.6.1 states that the usable volume in the CSTs must be verified to be $\geq 270,300$ gallons. This changes the CTS by deleting detail that the Surveillance must be performed when the CSTs are the supply source for the Auxiliary Feedwater System.	SR 3.7.6.1	4.7.1.3.1
3.7.6 A04	This change to CTS 3.7.1.3 is provided in the Davis-Besse ITS consistent with License Amendment Request No. 05-0007, submitted to the USNRC for approval in FENOC letter Serial Number 3198, from Mark B. Bezilla (FENOC) to USNRC, dated April 12, 2007. As such, this change is administrative.	3.7.6	3.7.1.3
3.7.7 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.7.7	3.7.3.1
3.7.7 A02	CTS 4.7.3.1 does not contain an explicit reference to isolating CCW flow to individual components. ITS SR 3.7.7.1 contains a Note which states, "Isolation of CCW flow to individual components does not render CCW System inoperable." This changes CTS by adding an allowance that is not explicitly stated in the CTS.	SR 3.7.7.1 Note	4.7.3.1
3.7.7 A03	CTS 4.7.3.1.a requires verification that each CCW valve (manual, power operated, or automatic) servicing safety related equipment that is not locked, sealed, or otherwise secured in position, is in its correct position. ITS SR 3.7.7.1 requires verification that each CCW manual,	SR 3.7.7.1	4.7.3.1.a

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	power operated, and automatic valve in the flow path servicing safety related equipment that is not locked, sealed, or otherwise secured in position, is in the correct position. This changes the CTS by adding the words "in the flow path" to CTS 4.7.3.1.a.		
3.7.8 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.7.8	3.7.4.1
3.7.8 A02	CTS 4.7.4.1 does not contain an explicit reference to isolating SWS flow to individual components. ITS SR 3.7.8.1 contains a Note which states, "Isolation of SWS flow to individual components does not render the SWS inoperable." This changes CTS by adding an allowance that is not explicitly stated in the CTS.	SR 3.7.8.1 Note	4.7.4.1
3.7.8 A03	CTS 4.7.4.1.a requires verification that each SWS valve (manual, power operated, or automatic) servicing safety related equipment that is not locked, sealed, or otherwise secured in position, is in its correct position. ITS SR 3.7.8.1 requires verification that each SWS manual, power operated, and automatic valve in the flow path servicing safety related equipment that is not locked, sealed, or otherwise secured in position, is in the correct position. This changes the CTS by adding the words "in the flow path" to CTS 4.7.4.1.a.	SR 3.7.8.1	4.7.4.1.a
3.7.9 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.7.9	3.7.5.1
3.7.10	In the conversion of the Davis-Besse Current Technical Specifications	3.7.10	3.7.6.1

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
A01	(CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).		
3.7.10 A02	CTS 3.7.6.1 does not provide an Action for two CREVS trains inoperable. Thus, CTS LCO 3.0.3 would be required to be entered. ITS 3.7.10 ACTION E requires immediate entry into ITS LCO 3.0.3 when two CREVS trains are inoperable in MODE 1, 2, 3, 4 for reasons other than Condition B. Condition B covers the inoperability of one or more CREVS trains due to an inoperable control room envelope (CRE) boundary in MODE 1, 2, 3, or 4. This changes the CTS by providing a specific ACTION for two inoperable CREVS trains for reasons other than due to an inoperable CRE boundary. The change to allow one or more CREVS trains to be inoperable due to a CRE boundary is discussed in DOC L01.	3.7.10 ACTION E	3.7.6.1 Actions 3.0.3
3.7.11 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.7.11	3.7.6.1
3.7.11 A02	CTS 3.7.6.1 states that two control room emergency ventilation systems shall be OPERABLE. CTS 4.7.6.1.a requires verification that the control room air temperature is < 110°F every 12 hours when the CREVS is operating. Thus, the CTS 3.7.6.1 statement that two CREVS shall be OPERABLE and the CTS 4.7.6.1 statement that each CREVS train shall be demonstrated OPERABLE includes the air temperature control portion of the CREVS. In the ITS, the requirements have been split into separate Technical Specifications; ITS 3.7.10, "Control Room	3.7.11	3.7.6.1 4.7.6.1.a

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	Emergency Ventilation System (CREVS)," for the filtration and control room envelope boundary requirements and ITS 3.7.11, "Control Room Emergency Air Temperature Control System (CREATCS)," for the control room envelope air conditioning requirements. Therefore, the ITS 3.7.11 LCO, ACTIONS, and Surveillance Requirement refers to the CREATCS. This changes the CTS by providing a separate Technical Specification for the CREATCS.		
3.7.12 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.7.12	3.6.5.1 3.6.5.2
3.7.13 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.7.13	3.9.12 4.6.5.1.a, b, and d.3
3.7.13 A02	CTS 3.9.12 Action d states, in part, that the provisions of Specification 3.0.4 are not applicable. ITS 3.7.13 does not include this exception. This changes the CTS by deleting the specific exception to Specification 3.0.4.	None	3.9.12 Action d
3.7.14 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.7.14	3.9.11
3.7.14	CTS 3.9.11 Action states that with the requirement of the Specification	3.7.14 Required	3.9.11 Action

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
A02	not satisfied, suspend all movement of fuel. ITS 3.7.14 Required Action A.1 requires the immediate suspension of movement of irradiated fuel assemblies in the fuel storage pool. This changes the CTS by explicitly specifying that the compensatory action to suspend all movement of fuel assemblies requires an immediate response. Other changes to this CTS Action are discussed in DOCs L01 and L02.	Action A.1	
3.7.16 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.7.16	3.9.13
3.7.16 A02	The CTS 3.9.13 Action, in part, states to suspend all other fuel movement within the spent fuel pool when the requirements of the Specification are not met. ITS 3.7.16 ACTION A does not require this action. This changes the CTS by deleting the action to suspend all other fuel movement within the spent fuel pool.	None	3.9.13 Action
3.7.16 A03	CTS 3.9.13 Action, in part, states that with the requirements of the Specification not satisfied, to move the non-complying fuel assemblies to allowable locations in accordance with Figure 3.9-1. ITS 3.7.16 Required Action A.1 requires action to be immediately initiated to move the noncomplying fuel assembly to an allowable location. This changes the CTS by explicitly specifying that the compensatory action to move non-complying fuel assemblies to allowable locations requires an immediate response.	3.7.16 Required Action A.1	3.9.13 Action
3.7.16 A04	The CTS 3.9.13 Action, in part, states that the provisions of Specification 3.0.4 are not applicable. ITS 3.7.16 ACTION A does not include a Note similar to the exception in the CTS 3.9.13 Action. This changes the CTS by deleting the explicit exception from Specification 3.0.4 in CTS 3.9.13 Action.	None	3.9.13 Action

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.17 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.7.17	3.7.1.4
3.7.18 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.7.18	3.7.9
3.7.18 A02	The CTS 3.7.9 Action requires the unit to be ultimately placed in COLD SHUTDOWN (MODE 5) when the steam generator water level is not within limits. ITS 3.7.18 ACTION B only requires placing the unit in MODE 4. This changes the CTS by only requiring the unit to be in MODE 4 in lieu of MODE 5 when outside the SG water level limits.	3.7.18 ACTION B	3.7.9 Action
3.8.1 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.8.1	3.8.1.1 3.0.5 3.3.2.1, including Table 3.3-3 Functional Unit 4.a and Action 15 and Table 4.3-2
3.8.1 A02	The ITS 3.8.1 ACTIONS include a Note that states LCO 3.0.4.b is not applicable to the emergency diesel generators (EDGs). The CTS does not include this Note. This changes the CTS by including the ACTION Note.	3.8.1 ACTIONS Note	None
3.8.1 A03	CTS 3.8.1.1 Action c applies when one offsite circuit and one EDG are inoperable. In this condition, an essential bus may be de-energized.	3.8.1 ACTION D Note	3.8.1.1 Action c 3.8.2.1

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	CTS 3.8.2.1 provides an Action for an essential bus that is de-energized. A Note to ITS 3.8.1 ACTION D in the Required Actions column states, "Enter applicable Conditions and Required Actions of LCO 3.8.9, "Distribution Systems – Operating," when Condition D is entered with no AC power source to any train.		
3.8.1 A04	CTS 3.8.1.1 does not contain an Action for more than two sources of either offsite circuits or EDGs inoperable. Having more than two sources inoperable requires entering CTS LCO 3.0.3. ITS 3.8.1 ACTION I requires entering LCO 3.0.3 immediately if three or more AC Sources are inoperable. This changes the CTS by adding a specific ACTION requiring entry into LCO 3.0.3.	3.8.1 ACTION I	3.8.1.1, LCO 3.0.3
3.8.1 A05	CTS 4.8.1.1.2.a requires performance of 4.8.1.1.2.a.1, 4.8.1.1.2.a.3, 4.8.1.1.2.a.5, and 4.8.1.1.2.a.7 every 31 days, while CTS 4.8.1.1.2.c requires performance of similar Surveillances (CTS 4.8.1.1.2.c.1, 4.8.1.1.2.c.3, 4.8.1.1.2.c.5, and 4.8.1.1.2.c.7) every 184 days. In addition, CTS 4.8.1.1.2.a includes a statement that the Surveillances of CTS 4.8.1.1.2.a are only required if the Surveillances of CTS 4.8.1.1.2.c have not been performed within the previous 31 days. ITS SR 3.8.1.3, SR 3.8.1.4 and SR 3.8.1.6 perform the same Surveillances on a 31 day Frequency and ITS SR 3.8.1.7 is performed on a 92 day Frequency. This changes the CTS by combining the two similar Surveillances (one from CTS 4.8.1.1.2.a and the other from CTS 4.8.1.1.2.c) into a single Surveillance with a Frequency of 31 days or 92 days, as applicable. The change to allow 92 days for CTS 4.8.1.1.2.a.3 and CTS 4.8.1.1.2.c.3 is discussed in DOC L10.	SR 3.8.1.3 SR 3.8.1.4 SR 3.8.1.6 SR 3.8.1.7	4.8.1.1.2.a 4.8.1.1.2.c
3.8.1 A06	CTS 4.8.1.1.2.a.4, CTS 4.8.1.1.2.c.4, and CTS 4.8.1.1.2.d.2 require the EDGs to be started. ITS SR 3.8.1.2, SR 3.8.1.8, and SR 3.8.1.15 also require the EDGs to be started. However, each of the ITS Surveillances include a Note concerning prelube. ITS SR 3.8.1.2 and SR 3.8.1.15 Note 1, and the Note to SR 3.8.1.8 state that all EDG starts may be	SR 3.8.1.2 SR 3.8.1.8 SR 3.8.1.15	4.8.1.1.2.a.4 4.8.1.1.2.c.4 4.8.1.1.2.d.2

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	preceded by an engine prelube period and followed by a warm-up period prior to loading. This changes the CTS by adding the Notes to the applicable Surveillance Requirements.		
3.8.1 A07	CTS 4.8.1.1.2.a.4, requires, in part, a manual start of the EDGs. ITS SR 3.8.1.2 also requires the EDGs to be started, however, it includes a Note (Note 2) that states that a modified EDG start involving idling and gradual acceleration to synchronous speed may be used for this SR as recommended by the manufacturer.	SR 3.8.1.2	4.8.1.1.2.a.4
3.8.1 A08	CTS 4.8.1.1.2.a.5 and 4.8.1.1.2.c.5 require the EDG to be synchronized and loaded for > 60 minutes. ITS SR 3.8.1.3 Notes 1 and 2 have been added. Note 1 states that EDG loading may include gradual loading as recommended by the manufacturer. Note 2 states that momentary transients outside the load range do not invalidate this test. This changes the CTS by adding explicit Notes that state EDG loadings may include gradual loading as recommended by the manufacturer and momentary transients outside the load range do not invalidate this test.	SR 3.8.1.3	4.8.1.1.2.a.5 4.8.1.1.2.c.5
3.8.1 A09	CTS Table 3.3-3 Functional Unit 4 includes a Note # that states the provisions of Specification 3.0.4 are not applicable. ITS 3.8.1 does not include this Note for the sequencers. This changes the CTS by deleting the specific exception to Specification 3.0.4.	None	Table 3.3-3 Functional Unit 4 Note #
3.8.1 A10	CTS 4.8.1.1.1.b requires the offsite circuits be demonstrated OPERABLE by transferring (manually and automatically) unit power supply to each of the offsite circuits. ITS SR 3.8.1.9 requires the same Surveillance, broken into two parts - transfer from the unit auxiliary source to the pre-selected offsite circuit and from the normal offsite circuit to the alternate offsite circuit. However a Note is added that states the transfer from the unit auxiliary source to the pre-selected offsite circuit is only required to be met when the unit auxiliary source is supplying the electrical power distribution subsystem. This changes the CTS by clarifying that the Surveillance checks both the transfer from the	SR 3.8.1.9	4.8.1.1.1.b

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	unit auxiliary source (i.e., the main generator) to the pre-selected offsite circuit and the transfer from one offsite circuit to the other offsite circuit, and by adding a clarification Note to the Surveillance (Note 1 to ITS SR 3.8.1.9).		
3.8.2 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.8.2	3.8.1.2
3.8.2 A02	CTS 3.8.1.2 does not address the situation when an essential bus is de-energized as a result of the loss of an AC Source to an essential bus. A Note has been added to the Required Actions for an inoperable offsite circuit (ITS ACTION A) which requires entry into the applicable Conditions and Required Actions of LCO 3.8.10 when one required train (essential bus) is de-energized as a result of an inoperable offsite circuit. This changes the CTS by directing entry into LCO 3.8.10.	3.8.2 ACTION A Note	3.8.1.2
3.8.3 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.8.3	3.8.1.1 4.8.1.1.2.a.1 and c.2 3.8.1.2
3.8.3 A02	CTS 3.8.1.1 and 3.8.1.2 states the requirements for the AC Sources during operating and shutdown, respectively. These requirements are used to form the LCO and Applicability for the ITS diesel fuel oil Specification. ITS LCO 3.8.3, in part, states that the stored diesel fuel oil shall be within limits for each required EDG. The Applicability for this requirement is when the associated EDG is required to be OPERABLE. This changes the CTS by combining the requirement for diesel fuel oil	3.8.3	3.8.1.1 3.8.1.2

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	into one Specification		
3.8.3 A03	CTS 4.8.1.1.2.a and 4.8.1.1.2.a.2 require verifying the fuel level in the fuel storage tank every 31 days, while CTS 4.8.1.1.2.c and 4.8.1.1.2.c.2 require the same verification every 184 days. In addition, CTS 4.8.1.1.2.a includes a statement that CTS 4.8.1.1.2.a.2 is only required if CTS 4.8.1.1.2.c.2 has not been performed within the previous 31 days. ITS SR 3.8.3.1 performs the same verification on a 31 day Frequency. This changes the CTS by combining these two Surveillances into a single Surveillance with a Frequency of 31 days.	SR 3.8.3.1	4.8.1.1.2.a 4.8.1.1.2.a.2 4.8.1.1.2.c 4.8.1.1.2.c.2
3.8.3 A04	CTS 4.8.1.1.2.b specifies the requirements for the properties of stored fuel oil. The technical content of CTS 4.8.1.1.2.b is being moved to ITS 5.5.12, "Diesel Fuel Oil Testing Program." A Surveillance Requirement is added (ITS SR 3.8.3.3) to clarify that the tests of the Diesel Fuel Oil Testing Program must also be completed and passed for determining OPERABILITY of the stored diesel fuel oil.	SR 3.8.3.3	4.8.1.1.2.b
3.8.4 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.8.4	3.8.2.3
3.8.5 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.8.5	3.8.2.4
3.8.6 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting,	3.8.6	3.8.2.3 3.8.2.4

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).		
3.8.6 A02	CTS 3.8.2.3, in part, requires the Train A and B batteries to be OPERABLE during MODES 1, 2, 3, and 4. CTS 3.8.2.4, in part, requires the Train A or B batteries to be OPERABLE during MODES 5 and 6. ITS LCO 3.8.6 requires the battery parameters for Train 1 and 2 batteries to be within limits. ITS 3.8.6, which only covers the requirements for battery parameters, is applicable when the associated DC electrical power sources are required to be OPERABLE. This changes the CTS by combining the requirements for the Train 1 and Train 2 battery parameters into one Specification and replacing the actual MODES with the phrase "When associated DC electrical power sources are required to be OPERABLE."	3.8.6	3.8.2.3
3.8.9 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.8.9	3.8.2.1 3.8.2.3
3.8.9 A02	CTS 3.8.2.1 Action states that with less than the above complement of AC buses OPERABLE, to restore the inoperable bus to OPERABLE status within 8 hours. ITS 3.8.9 Required Action A.1 allows 8 hours to restore the Train 1 and Train 2 AC electrical power distribution subsystem(s) to OPERABLE status. In addition, a Note has been added (ITS 3.8.9, Note to ACTION A) that requires entry into applicable Conditions and Required Action of LCO 3.8.4, "DC Sources – Operating," for DC Sources made inoperable by inoperable power distribution subsystems. This changes the CTS by requiring the compensatory actions for DC Sources to be taken if a DC Source is	3.8.9	3.8.2.1

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	made inoperable by inoperable power distribution subsystems.		
3.8.10 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.8.10	3.8.2.2 3.8.2.4
3.9.1 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.9.1	3.9.1
3.9.1 A02	CTS 3.9.1 provides requirements on the boron concentration of all filled portions of the Reactor Coolant System (RCS) and the refueling canal. ITS 3.9.1 provides requirements on the boron concentration of the RCS and the refueling canal. This changes the CTS by deleting the term "all filled portions" when referring to the RCS.	LCO 3.9.1	LCO 3.9.1
3.9.1 A03	CTS 3.9.1 Action contains the statement, "The provisions of Specification 3.0.3 are not applicable." ITS 3.9.1 does not contain an equivalent statement. This changes the CTS by deleting the Specification 3.0.3 exception.	None	3.9.1 Action
3.9.2 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.9.2	3.9.2
3.9.2 A02	CTS 3.9.2 Action b.1 states that when there is no OPERABLE source range neutron flux monitor to perform Action a. ITS 3.9.2 does not	None	3.9.2 Action b.1

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	contain this specific requirement. This changes the CTS by deleting the specific statement to "perform Action a."		
3.9.2 A03	CTS 3.9.2 Action b.3 states that, when both source range neutron flux monitors are inoperable, to verify that the RCS Boron meets the requirement of LCO 3.9.1, using chemical analysis to determine the boron concentration of the reactor pressure vessel and the refueling canal once per 12 hours. Under similar conditions, ITS 3.9.2 Required Action B.2 requires performance of SR 3.9.1.1 once per 12 hours. This changes the CTS by replacing the prescriptive requirement for verification of boron concentration with a more general requirement	3.9.2 Required Action B.2	3.9.2 Action b.3
3.9.2 A04	CTS 4.9.2.d requires performance of a CHANNEL CALIBRATION on the source range neutron flux monitors "prior to entry into MODE 6 if not performed within the last" 18 months. ITS 3.9.2.2 only requires performance of the CHANNEL CALIBRATION every 18 months. This changes the CTS by deleting the statement "prior to entry into MODE 6 if not performed within the last."	SR 3.9.2.2	4.9.2.d
3.9.3 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS)	3.9.3	3.9.3
3.9.3 A02	CTS 3.9.3 Action contains the statement, "The provisions of Specification 3.0.3 are not applicable." ITS 3.9.3 does not contain an equivalent statement. This changes the CTS by deleting the Specification 3.0.3 exception.	None	3.9.3 Action
3.9.4 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-	3.9.4	3.9.8.1

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).		
3.9.4 A02	CTS 3.9.8.1 Action a states, in part, that with less than one DHR loop in operation, suspend all operations involving an increase in the reactor decay heat load of the Reactor Coolant System. Under similar conditions, ITS 3.9.4 Required Action A.2 states to suspend loading irradiated fuel assemblies in the core. This changes the CTS by requiring that the loading of irradiated fuel assemblies be suspended instead of requiring that all operations involving an increase in the reactor decay heat load be suspended.	3.9.4 Required Action A.2	3.9.8.1 Action a
3.9.4 A03	CTS 3.9.8.1 Action c states "The provisions of Specification 3.0.3 are not applicable." ITS 3.9.4 does not include this statement. This changes CTS by deleting the Specification 3.0.3 exception.	None	3.9.8.1 Action c
3.9.5 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.9.5	3.9.8.2 4.9.8.1
3.9.5 A02	CTS 3.9.8.2 is modified by footnote *, which states that the normal or emergency power source may be inoperable for each DHR loop. ITS 3.9.5 does not include this statement. This changes the CTS by deleting an allowance already provided in a different portion of the ITS.	None	3.9.8.2 footnote *
3.9.5 A03	CTS 3.9.8.2 Action a states that with less than the required DHR loops OPERABLE, immediately initiate corrective action to return the required DHR loops to OPERABLE status as soon as possible. ITS 3.9.5 ACTION A includes the same requirement, but also includes an allowance (Required Action A.2) to immediately initiate action to establish > 23 feet of water above the top of the reactor vessel flange. This changes the CTS by providing the option to exit the Applicability of	3.9.5 Required Action A.2	3.9.8.2 Action a

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	the LCO.		
3.9.5 A04	CTS 3.9.8.2 Action b states, "The provisions of Specification 3.0.3 are not applicable." ITS 3.9.5 does not include this statement. This changes CTS by deleting the Specification 3.0.3 exception.	None	3.9.8.2 Action b
3.9.6 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	3.9.6	3.9.10
3.9.6 A02	CTS 3.9.10 is applicable during movement of fuel assemblies or control rods within the reactor pressure vessel while in MODE 6. ITS 3.9.6 is applicable during movement of irradiated fuel assemblies within containment. This changes the CTS by eliminating the "MODE 6" portion of the Applicability. The change to "irradiated fuel assemblies" from "fuel assemblies" is discussed in DOC L01. The change from within "the reactor pressure vessel" to within "containment" is discussed in DOC M02. The change eliminating control rods is discussed in DOC L02.	3.9.6 Applicability	3.9.10 Applicability
3.9.6 A03	CTS 3.9.10 Action states "The provisions of Specification 3.0.3 are not applicable." ITS 3.9.6 does not include this statement. This changes CTS by deleting the Specification 3.0.3 exception.	None	3.9.10 Action
3/4.9.4 A01	This change to CTS 3.9.4 is provided in the Davis-Besse ITS consistent with License Amendment Request No. 06-0002, submitted to the USNRC for approval in FENOC letter Serial Number 3301, from Mark B. Bezilla (FENOC) to USNRC, dated February 12, 2007. As such, this change is administrative.	None	3.9.4
4.0 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting,	4.0	5.0

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).		
5.1 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	5.1	6.1
5.2 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	5.2	6.2 6.3.1
5.2 A02	CTS 6.2.2.b states "At least one licensed Operator shall be in the control panel area when fuel is in the reactor." CTS 6.2.2.c states "At least two licensed Operators, one of which has a Senior Operator license, shall be present in the control room while in MODES 1, 2, 3, or 4." CTS 6.2.2.e requires all CORE ALTERATIONS to be directly supervised by a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation. The ITS does not include these requirements. This changes the CTS by deleting these requirements.	None	6.2.2.b 6.2.2.c 6.2.2.e
5.2 A03	CTS Table 6.2-1 footnote ** states "One of the two required individuals filling the SOL positions may also assume the STA function provided the individual meets the qualifications for the combined SRO/STA position specified for Option 1 of the Commission Policy Statement on Engineering Expertise on Shift. If this option is used for a shift, then the separate STA position may be eliminated for that shift." ITS 5.2.2, in	5.2.2	Table 6.2-1 footnote **

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	part, requires the STA to meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift; it does not include this specific information. This changes the CTS by deleting this specific information.		
5.2 A04	CTS 6.3.1 provides, in part, qualification requirements for the Shift Technical Advisor (STA), and requires the STA to have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transient and accidents. ITS 5.2.2.f requires this individual to meet the qualification requirements of the Commission Policy Statement on Engineering Expertise on Shift for qualification requirements instead of listing the specific qualification requirements.	5.2.2.f	6.3.1
5.3 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	5.3	6.3
5.3 A02	ITS 5.3.2 states "For the purpose of 10 CFR 55.4, a licensed Senior Operator and a licensed Operator are those individuals who, in addition to meeting the requirements of Specification 5.3.1, perform the functions described in 10 CFR 50.54(m)." The CTS does not include such a statement. This changes the CTS by clarifying that these individuals must meet all of the qualification requirements referenced in 10 CFR 55.4, ITS 5.3.1, and 10 CFR 50.54(m).	5.3.2	None
5.4 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock	5.4	6.8.1 6.8.2

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.4 A02	and Wilcox Plants" (ISTS). CTS 6.8.1.b requires written procedures be established, implemented, and maintained covering refueling operations. CTS 6.8.1.c requires written procedures be established, implemented, and maintained covering surveillance and test activities of safety related equipment. ITS 5.4.1.a requires written procedures to be established, implemented and maintained to the applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978. This changes the CTS by deleting the specific wording of CTS 6.1.8.b and 6.8.1.c.	5.4.1.a	6.8.1.b 6.8.1.c
5.4 A03	CTS 6.8.1.d and CTS 6.8.1.e require written procedures be established, implemented, and maintained for the Physical Security Plan and the Davis-Besse Emergency Plan. The ITS does not contain these requirements. This changes the CTS by deleting the specific reference to the Security Plan and the Emergency Plan.	None	6.8.1.d 6.8.1.e
5.4 A04	CTS 6.8.1.i requires written procedures be established, implemented and maintained for the Offsite Dose Calculation Manual (ODCM). ITS 5.4.1 requires procedures for various activities, but does not specifically list the ODCM. This changes the CTS by removing the explicit requirements for written procedures for implementation of the ODCM.	5.4.1	6.8.1.i
5.5 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	5.5	6.8.4 6.15 6.16 6.17 1.31 4.0.5 3.3.3.5.2 Action b 4.4.10.1.a and b 4.8.1.1.2.b 3.11.1

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
			3.11.2 License Condition 2.C(5)
5.5 A02	<p>CTS 6.8.4.a specifies the requirements for the Primary Coolant Sources Outside Containment Program, however there is no statement as to whether or not the provisions of CTS 4.0.2 are applicable. CTS 6.8.4.d specifies the requirements for the Radioactive Effluent Controls Program, however there is no statement as to whether or not the provisions of CTS 4.0.2 and CTS 4.0.3 are applicable. ITS 5.5.2 states that the provisions of SR 3.0.2 are applicable to the Primary Coolant Sources Outside Containment Program Surveillance Frequency. ITS 5.5.3 states that the provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluent Controls Program Surveillance Frequencies. This changes the CTS by adding the allowances of ITS SR 3.0.2 to the Primary Coolant Sources Outside Containment Program and the allowances of ITS SR 3.0.2 and SR 3.0.3 to the Radioactive Effluent Controls Program.</p>	5.5.2 5.5.3	6.8.4.a 6.8.4.d
5.5 A03	<p>CTS 6.8.4.f provides the requirements for the Ventilation Filter Testing Program. The Program uses the nomenclature "Shield Building Emergency Ventilation System." However, CTS 3.6.5.1 uses the nomenclature "emergency ventilation system" for the same ventilation system. ITS 5.5.10 uses the nomenclature "Station Emergency Ventilation System." This changes the CTS by using a common nomenclature for the Station Emergency Ventilation System.</p>	5.5.10	6.8.4.f 3.6.5.1
5.5 A04	<p>CTS 6.8.4.f footnote * states the periodic testing for the Shield Building Emergency Ventilation System and the Control Room Emergency Ventilation System are performed once each REFUELING INTERVAL. The need for testing following painting, a fire, or a chemical release in any ventilation zone communicating with the Shield Building Emergency Ventilation System or Control Room Emergency Ventilation System is</p>	None	6.8.4.f footnote *

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	as specified in the VFTP. The method for testing is based on Regulatory Guide 1.52, Revision 2, except for charcoal laboratory testing which will be performed in accordance with ASTM D 3803-1989. ITS 5.5.10 does not contain this footnote. This changes the CTS by deleting this footnote.		
5.5 A05	CTS 6.16, Containment Leakage Rate Testing Program, requires the performance of containment leakage rate testing in accordance with 10 CFR 50 Appendix J Option B, except as modified by NRC-approved exemptions, and Regulatory Guide 1.1.63, dated September 1995. CTS 6.16.e states that the provisions of Specification 4.0.2 do not apply to the test frequencies in the Containment Leakage Rate Testing Program. ITS 5.5.15 does not include this provision. This changes the CTS by deleting the statement that the provisions of Specification 4.0.2 are not applicable.	None	6.16.e
5.5 A06	ITS 5.5.16 provides the requirements for the Battery Monitoring and Maintenance Program. ITS 5.5.17 provides the requirements for the Control Room Envelope Habitability Program. The CTS does not include these two programs. This changes the CTS by including these two new programs.	5.5.16 5.5.17	None
5.5 A07	CTS 4.0.5.d states that the performance of the above testing activities shall be in addition to other specified Surveillance Requirements. ITS 5.5.7 does not include a similar statement. This changes the CTS by deleting the statement.	None	4.0.5.d
5.5 A08	CTS 4.0.5 specifies the requirements for the Inservice Testing Program, however there is no statement whether the provisions of CTS 4.0.3 are applicable. ITS 5.5.7.c states that the provisions of SR 3.0.3 are applicable to the inservice testing activities. This changes the CTS by adding the allowances of ITS SR 3.0.3 to the Technical Specification Inservice Testing Program requirements.	5.5.7.c	4.0.5
5.5	CTS 4.4.10.1.b requires reactor vessel internals vent valves to be	5.5.4	4.4.10.1.b

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
A09	tested every 24 months "during shutdown." ITS 5.5.4 requires similar testing every 24 months, but does not include the "during shutdown" requirement. This changes the CTS by deleting the "during shutdown" testing requirement.		
5.5 A10	The internal vent valves requirements in CTS 4.4.10.1.b have been placed in a program in the proposed Administrative Controls Chapter 5.0 (ITS 5.5.4). As such a general program statement of applicability of ITS SR 3.0.2 and SR 3.0.3 is needed to clarify the allowances for Surveillance Frequency extensions do apply. This changes the CTS by specifically stating the applicability of ITS SR 3.0.2 and SR 3.0.3.	5.5.4	4.4.10.1.b
5.5 A11	CTS 4.4.10.b.1 requires reactor vessel internals vent valves to be tested every 24 months. CTS 4.4.10.1.b is modified by footnote *, which states that an exception applies for the interval following March 2003 verification completed during the Thirteenth Refueling Outage. Under this exception, the next performance of the surveillance requirement may be delayed until March 25, 2006. ITS 5.5.4 does not contain this footnote. This changes the CTS by deleting the footnote.	None	4.4.10.1.b footnote *
5.5 A12	The Surveillance associated with diesel fuel oil testing (CTS 4.8.1.1.2.b) has been placed in a program in the proposed Administrative Controls Chapter 5.0 (ITS 5.5.12). As such, a general program statement has been added as ITS 5.5.12. Also, a statement of the applicability of ITS SR 3.0.2 and SR 3.0.3 is needed to clarify that the allowances for Surveillance Frequency extension do apply. This changes the CTS by moving the diesel fuel oil testing Surveillance to a program in ITS 5.5 and specifically stating the applicability of ITS SR 3.0.2 and SR 3.0.3 in the program.	5.5.12	4.8.1.1.2.b
5.5 A13	The liquid holdup tank requirements in CTS 3/4.11.1 and the explosive gas mixture requirements of CTS 3/4.11.2 have been placed in a program in the proposed Administrative Controls Chapter 5.0 (ITS 5.5.11). As such, a general program statement has been added. Also,	5.5.11	3/4.11.1 3/4/11.2

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	a statement of applicability of ITS SR 3.0.2 and SR 3.0.3 is needed to clarify the allowances for Surveillance Frequency extensions do apply. This changes the CTS by moving liquid holdup tank requirements and the explosive gas mixture requirements to a program in ITS 5.5.11 and specifically stating the applicability of ITS SR 3.0.2 and SR 3.0.3 in the program.		
5.5 A14	CTS 3.11.1 requires that the quantity of radioactive material contained in each unprotected outdoor tank shall be limited to less than or equal to 10 curies, excluding tritium and dissolved or entrained noble gases. ITS 5.5.11.b requires that the quantity of radioactive material contained in each unprotected outdoor tank shall be limited to less than the amount that would result in concentrations less than the limits of 10 CFR 20, Appendix B, Table 2, Column 2, at the nearest potable water supply and the nearest surface water supply in an unrestricted area, in the event of an uncontrolled release of the tank's contents. This changes the CTS by specifically stating that program shall meet the 10 CFR 20 requirements.	5.5.11.b	3.11.1
5.6 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	5.6	6.9
5.6 A02	CTS 6.9.1 requires, in addition to the requirements of 10 CFR, reports be submitted to the Regional Office. ITS 5.6 requires that the reports be submitted in accordance with 10 CFR 50.4. This changes the CTS by removing the explicit requirement to send reports to the Regional Office.	5.6	6.9.1
5.6 A03	CTS 6.9.1.7 requires, in part, that core operating limits be established and documented in the COLR for the CTS 3/4.1.3.7, "Rod Program,"	5.6.3.a	6.9.1.7

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	and CTS 3/4.1.3.8, "Xenon Reactivity." ITS 5.6.3.a does not include a reference to these Specifications. This changes the CTS by eliminating the reference to Rod Program and Xenon Reactivity limits being core operating limits that are included in the COLR.		
5.6 A04	CTS 6.9.1.7 contains a list of the core operating limits established and documented in the COLR. ITS 5.6.3.a includes additional core operating limits established and documented in the COLR. These are LCO 3.1.1, "SHUTDOWN MARGIN (SDM)"; LCO 3.1.7, "Position Indicator Channels" (SR 3.1.7.1 limits); LCO 3.1.8, "PHYSICS TEST Exceptions – MODE 1"; LCO 3.1.9, "PHYSICS TEST Exceptions – MODE 2"; and LCO 3.9.1, "Boron Concentration." These limits had been previously addressed in the CTS, but are being moved to the COLR in the ITS, and because of this are listed in ITS 5.6.3.a. This changes the CTS by adding core operating limits established and documented in the COLR (and applicable methodology) because they are being moved there as part of changes to other parts of the CTS. Technical aspects of the changes are addressed in the Discussion of Changes for the respective individual ITS Specifications.	5.6.3.a	6.9.1.7
5.6 A05	CTS 6.9.1.7 requires the CORE OPERATING LIMITS REPORT (COLR) to be provided to the NRC document control desk with copies to the Regional Administrator and Resident Inspector. ITS 5.6.3.d requires the COLR to be provided to the NRC. This changes the CTS by removing the specifics regarding distribution of the reports to the NRC.	5.6.3.d	6.9.1.7
5.6 A06	ITS 5.6.5, "Post Accident Monitoring Report," provides the reporting requirements when Condition B of LCO 3.3.17, "Post Accident Monitoring (PAM) Instrumentation," is entered. The CTS does not include this report. This changes the CTS by adding a new PAM Report.	5.6.5	None
5.6	CTS 6.9.2 requires special reports be submitted to the NRC and lists	None	6.9.2

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
A07	the CTS Specifications that require special reports to be submitted. The ITS does not require these special reports to be prepared and submitted. This changes the CTS by deleting the references to the CTS Specifications requiring special reports. Justification for disposition of each of the special report requirements is addressed by the Discussion of Changes for the respective ITS or CTS Specification.		
5.6 A08	This change to CTS 6.9.1.7 is provided in the Davis-Besse ITS consistent with License Amendment Request No. 05-0007, submitted to the USNRC for approval in FENOC letter Serial Number 3198, from Mark B. Bezilla (FENOC) to USNRC, dated April 12, 2007. As such, this change is administrative.	5.6	6.9.1.7
5.7 A01	In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).	5.7	6.12
6.0 A01	CTS 6.13 requires that by June 30, 1982, all safety-related electrical equipment be environmentally qualified in accordance with the Division of Operating Reactors (DOR) Guidelines or NUREG-0588. It further requires that complete and auditable environmental qualification records be available and maintained at a central location by December 1, 1980. ITS Chapter 5.0 does not retain these requirements. This changes the CTS by deleting the requirement related to complying with the 10 CFR 50.69 requirements.	None	6.13