

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
1.0 LA01	Table 1.1	CTS Table 1.1, "OPERATIONAL MODES," states that MODE 6 is restricted to reactivity conditions with $k_{eff} \leq 0.95$. ITS Table 1.1-1, "MODES," does not contain this restriction. This changes the CTS by moving this requirement to the ITS Bases.	Bases	Bases Control Program	1
3.1.1 LA01	3.1.1.1	CTS 3.1.1.1 states that the SDM shall be $\geq 1.0\% \Delta k/k$. The specific value of $1.0\% \Delta k/k$ also appears in the CTS 3.1.1.1 Actions and Surveillance Requirements. ITS 3.1.1 states that SDM shall be within the limits provided in the Core Operating Limits Report (COLR). The Actions and Surveillance Requirements of ITS 3.1.1 also reference SDM values located in the COLR. This changes the CTS by relocating the SDM limit, which must be confirmed on a cycle-specific basis, to the COLR.	COLR	ITS 5.6.3	5
3.1.1 LA02	4.1.1.1.1.e	CTS 4.1.1.1.1.e requires determination that SDM is within limit by consideration of the following factors: reactor coolant system boron concentration, control rod position, reactor coolant system average temperature, fuel burnup based on gross thermal energy generation, xenon concentration, and samarium concentration. ITS SR 3.1.1.1 requires a determination that SDM is within limit but does not describe the factors that must be considered in the calculation. This changes the CTS by removing details of how to perform the SDM verification to the Bases.	ITS Bases	Technical Specification Bases Control Program	3
3.1.2 LA01	4.1.1.1.2 4.1.1.1.1.e	CTS 4.1.1.1.2 requires comparison of the actual and predicted core reactivity balance, and specifically requires consideration of at least those factors stated in	ITS Bases	Technical Specification Bases Control Program	3

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		Specification 4.1.1.1.1.e. CTS 4.1.1.1.1.e requires determination of SDM and requires the consideration of the following factors: reactor coolant system boron concentration, control rod position, reactor coolant system average temperature, fuel burnup based on gross thermal energy generation, xenon concentration, and samarium concentration. ITS SR 3.1.2.1 requires comparison of the actual and predicted core reactivity balance, but does not describe the factors that must be considered in the calculation. This information is relocated to the Bases. This changes the CTS by removing details on how the core reactivity balance comparison calculation is performed from the CTS and placing the information in the Bases.			
3.1.4 LA01	3.1.3.1 Action a	CTS 3.1.3.1 Action a applies when one or more control rods are inoperable "due to being immovable as a result of excessive friction or mechanical interference or known to be untrippable." ITS 3.1.4 Condition D applies when one or more CONTROL RODs are inoperable. ITS 3.1.4 Condition D does not list the ways in which the rods can be inoperable (i.e., "due to being immovable as a result of excessive friction or mechanical interferences or known to be untrippable"). This changes the CTS by moving the details of the reason the rod is considered inoperable to the Bases	ITS Bases	Technical Specification Bases Control Program	1
3.1.4 LA02	3.1.3.1 Action c.2.a)	CTS 3.1.3.1 Action c.2.a) requires an analysis of the potential ejected rod worth to be determined to be < 1.0% Δk at zero power and < 0.65% Δk at RATED THERMAL POWER for the remainder of the cycle. ITS 3.1.4 Required Action A.4 requires the verification that	ITS Bases	Technical Specification Bases Control Program	1

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		the potential ejected rod worth is within the assumptions of the rod ejection analysis. This changes the CTS by moving the potential ejected rod worth limits ($< 1.0\% \Delta k$ at zero power and $< 0.65\% \Delta k$ at RATED THERMAL POWER for the remainder of the cycle) to the Bases.			
3.1.7 LA01	3.1.3.1	CTS 3.1.3.3 requires the safety, regulating, and axial power shaping rod absolute position indicator channels and relative position indicator channels to be OPERABLE "and capable of determining the control rod group average positions within $\pm 1.5\%$." ITS LCO 3.1.7 requires the absolute position indicator channel and the relative position indicator channel for each CONTROL ROD and APSR to be OPERABLE. This changes the CTS by deleting the detail of the capability of the indicators "and capable of determining the control rod group average positions within $\pm 1.5\%$ " and relocating this detail to the UFSAR.	UFSAR	10 CFR 50.59 10 CFR 50.71(e)	1
3.1.7 LA02	3.1.3.3 Action a.2.a 3.1.3.3 Action a.2.b	CTS 3.1.3.3 Action a.2.a requires the position of the control rod to be verified with the 0%, 25%, 50%, 75%, or 100% position reference indicator channels and CTS 3.1.3.3 Action a.2.b requires the position of the control rod to be maintained at the 0%, 25%, 50%, 75%, or 100% position reference indicator positions. ITS 3.1.7 Required Actions B.1.1 requires actuation of the affected rod's zone reference indicators and ITS 3.1.7 Required Action B.1.2 requires the rods to be maintained at the zone reference indicator position, but the details of where the rod's zone reference indicators are located (i.e., 0%, 25%, 50%, 75%, or 100%) are moved to the Bases. This changes the CTS by removing details of	ITS Bases	Technical Specification Bases Control Program	1

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		what constitutes an OPERABLE system to the Bases.			
3.1.7 LA03	4.1.3.3	CTS 4.1.3.3 requires each absolute and relative position indicator to be determined OPERABLE by verifying that the relative position indicator channels and the absolute position indicator channels agree within "3.46%." ITS SR 3.1.7.1 requires the verification that the absolute position indicator channels and the relative position indicator channels agree within the limit specified in the COLR. This changes the CTS by relocating the agreement criteria, which must be confirmed on a cycle-specific basis, to the COLR.	COLR	ITS 5.6.3	5
3.1.8 LA01	3.1.1.1 3.1.1.1 Action	CTS 3.1.1.1 and associated Action require that the SDM be $> 1.0\% \Delta k/k$. ITS LCO 3.1.8.d states that the SDM shall be within the limits specified in the COLR, ITS 3.1.8 ACTION A provides actions for when the SDM is not within the limits, and ITS SR 3.1.8.4 requires verification that the SDM is within limits specified in the COLR. This changes the CTS by relocating the SDM limits, which must be confirmed on a cycle-specific basis, to the COLR.	COLR	ITS 5.6.3	5
3.1.9 LA01	3.10.2.c 4.10.2.2	CTS 3.10.2.c requires the nuclear instrumentation "Source Range and Intermediate Range" high startup rate control rod withdrawal inhibit to be OPERABLE. CTS 4.10.2.2, in part, requires the nuclear instrumentation "Source Range and Intermediate Range" high startup rate control rod withdrawal inhibit to be subjected to a CHANNEL FUNCTIONAL TEST. ITS LCO 3.1.9.c requires the nuclear instrumentation high startup rate control rod withdrawal inhibit to be	ITS Bases	Technical Specification Bases Control Program	3

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ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		OPERABLE. ITS SR 3.1.9.1, in part, requires the performance of a CHANNEL FUNCTIONAL TEST on the nuclear instrumentation rod inhibit channels. This changes the CTS by removing details of the specific channels (i.e., Source Range and Intermediate Range) and placing the information in the Bases.			
3.1.9 LA02	3.1.1.1 3.1.1.1 Action	CTS 3.1.1.1 and associated Action require that the SDM be $> 1.0\% \Delta k/k$. ITS LCO 3.1.9.d states that the SDM shall be within the limits specified in the COLR. ITS 3.1.9 ACTION B provides actions for when the SDM is not within the limits, and ITS SR 3.1.9.4 requires verification that the SDM is within limits specified in the COLR. This changes the CTS by relocating the SDM limits, which must be confirmed on a cycle-specific basis, to the COLR.	COLR	ITS 5.6.3	5
3.2.1 LA01	4.1.1.1	CTS 4.1.1.1 requires that the SDM be $\geq 1\% \Delta k/k$. ITS 3.2.1.3 states that the SDM shall be within the limits of the COLR. This changes the CTS by relocating the SDM limit, which must be confirmed on a cycle-specific basis, to the COLR.	COLR	ITS 5.6.3	5
3.2.1 LA02	4.1.1.1.1.c	CTS 4.1.1.1.1.c requires verification that SHUTDOWN MARGIN is within limit by verifying the "predicted critical control rod position is within the limits" of Specification 3.1.3.6. ITS SR 3.2.1.3 requires verification that SDM is within the limits. This changes the CTS by removing details of how to perform the SHUTDOWN MARGIN verification to the Bases.	ITS Bases	Technical Specification Bases Change Control Process	3
3.2.5 LA01	4.2.2.2 4.2.3.2	CTS 4.2.2.2 requires that the measured FQ of CTS 4.2.2.1 to be increased by 1.4% to account for	ITS Bases	Technical Specification Bases	3

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		manufacturing tolerances and further increased by 7.5% to account for measurement uncertainty. CTS 4.2.3.2 requires that the measured $F_{\Delta H}^N$ of CTS 4.2.3.1 to be increased by 5% for measurement uncertainty. ITS SR 3.2.5.1 does not require these additional factors to be incorporated. This changes the CTS by relocating the procedural detail to include manufacturing tolerances and measurement uncertainty, as appropriate, in the measurement of FQ and $F_{\Delta H}^N$ to the Bases. The relocation of the specific values of the manufacturing tolerances and measurement uncertainties corrections are justified in Discussion of Change LA02.		Change Control Process	
3.2.5 LA02	4.2.2.2 4.2.3.2	CTS 4.2.2.2 requires that the measured FQ of CTS 4.2.2.1 to be increased by 1.4% to account for manufacturing tolerances and further increased by 7.5% to account for measurement uncertainty. CTS 4.2.3.2 requires that the measured $F_{\Delta H}^N$ of CTS 4.2.3.1 to be increased by 5% for measurement uncertainty. ITS SR 3.2.5.1 does not require these additional factors to be incorporated. This changes the CTS by relocating the specific values of the manufacturing tolerances and measurement uncertainties corrections, which must be confirmed on a cycle-specific basis, to the COLR. The relocation of the procedural details to make the corrections to the measured FQ and $F_{\Delta H}^N$ is justified in Discussion of Change LA01.	COLR	ITS 5.6.3	5
3.3.1 LA01	4.3.1.1.3	CTS 4.3.1.1.3 requires each RPS trip function to be response time tested. However, CTS 4.3.1.1.3 exempts	ITS Bases	Technical Specification Bases	3

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		the neutron detectors from response time testing and specifies that the "response time of the neutron flux signal portion of the channel shall be measured from the neutron detector output or from the input of first electronic component in the channel." ITS SR 3.3.1.8 Note 1 exempts the neutron detectors from response time testing, but does not include the detail of how to test the neutron flux signal portion of the channel. This changes the CTS by moving the descriptive wording from the Specification to the Bases.		Control Program	
3.3.1 LA02	Table 3.3-1 Total No. of Channels and Channels to Trip columns	CTS Table 3.3-1 for RPS instrumentation has three columns stating various requirements for each function. These columns are labeled, "TOTAL NO. OF CHANNELS," "CHANNELS TO TRIP," and "MINIMUM CHANNELS OPERABLE." ITS Table 3.3.1-1 does not retain the "TOTAL NO. OF CHANNELS" or "CHANNELS TO TRIP" columns. This changes the CTS by moving the information of the "TOTAL NO. OF CHANNELS" and "CHANNELS TO TRIP" columns to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.3.1 LA03	Table 4.3-1 Note 3	CTS Table 4.3-1 Functional Unit 4 requires a monthly CHANNEL CALIBRATION of the Flux - Δ Flux - Flow channels. However, CTS Table 4.3-1 Note 3 requires the test to be performed above 50% RTP at a "steady state" condition and requires a comparison of out-of-core measured AXIAL POWER IMBALANCE to incore measured AXIAL POWER IMBALANCE. ITS SR 3.3.1.4 requires a comparison of the results of the out of core measured AXIAL POWER IMBALANCE to incore measured AXIAL POWER IMBALANCE. This Surveillance contains a Note (Note 2) that states that it is	ITS Bases	Technical Specification Bases Control Program	3

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ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		not required to be performed until 24 hours after THERMAL POWER is > 50% RTP. This changes the CTS by moving the details that the Surveillance must be done at "steady state" conditions from the Technical Specifications to the Bases.			
3.3.1 LA04	Table 2.2-1 Note *	CTS Table 2.2-1 specifies the Allowable Values for the RPS Instrumentation Functional Units and the table includes a Note * that states the Allowable Value is specified for the CHANNEL FUNCTIONAL TEST. ITS Table 3.3.1-1 only provides the Allowable Value. This changes the CTS by moving the details that the specified Allowable Value is for the CHANNEL FUNCTIONAL TEST from the Technical Specifications to the Bases.	ITS Bases	Technical Specification Bases Control Program	3
3.3.1 LA05	4.3.1.1.3	CTS 4.3.1.1.3 requires each RPS trip function to be response time tested. However, CTS 4.3.1.1.3 includes a Note (*) that states, in part, "a delay time has been assumed for the Reactor Coolant Pump monitor in the determination of the response time of the High Flux/Number of Reactor Coolant Pumps On functional unit." ITS SR 3.3.1.8 does not contain this Note. This changes the CTS by moving the CTS 4.3.1.1.3 Note (*) to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	3
3.3.1 LA06	Table 4.3-1 Note 10	CTS Table 4.3-1 Note (10) states that if the as-found instrument channel setpoint is not conservative with respect to the Allowable Value, the channel shall be declared inoperable. ITS 3.3.1 requires four channels of RPS instrumentation for each Function in Table 3.3.1-1 to be OPERABLE, and Table 3.3.1-1 includes an Allowable Value column. However, ITS 3.3.1 does not	ITS Bases	Technical Specification Bases Control Program	1

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		include this statement in either Table 3.3.1-1 footnote (c) or (d). This changes the CTS by moving the details of what constitutes an OPERABLE channel (with respect to the Allowable Value) to the Bases.			
3.3.2 LA01	Table 3.3-1 Total No. of Channels and Channels to Trip columns	CTS Table 3.3-1 for RPS instrumentation has three columns stating various requirements for each Functional Unit. These columns are labeled, "TOTAL NO. OF CHANNELS," "CHANNELS TO TRIP," and "MINIMUM CHANNELS OPERABLE." ITS 3.3.2 does not retain the "TOTAL NO. OF CHANNELS" or "CHANNELS TO TRIP" columns. This changes the CTS by moving the information of the "TOTAL NO. OF CHANNELS" and "CHANNELS TO TRIP" columns to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.3.3 LA01	Table 3.3-1 Total No. of Channels and Channels to Trip columns	CTS Table 3.3-1 for RPS instrumentation has three columns stating various requirements for each Functional Unit. These columns are labeled, "TOTAL NO. OF CHANNELS," "CHANNELS TO TRIP," and "MINIMUM CHANNELS OPERABLE." ITS Table 3.3.3-1 does not retain the "TOTAL NO. OF CHANNELS" or "CHANNELS TO TRIP" columns. This changes the CTS by moving the information of the "TOTAL NO. OF CHANNELS" and "CHANNELS TO TRIP" columns to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.3.4 LA01	Table 3.3-1 Total No. of Channels and Channels to Trip columns	CTS Table 3.3-1 for RPS instrumentation has three columns stating various requirements for each Functional Unit. These columns are labeled, "TOTAL NO. OF CHANNELS," "CHANNELS TO TRIP," and "MINIMUM CHANNELS OPERABLE." ITS 3.3.4 does	ITS Bases	Technical Specification Bases Control Program	1

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ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		not retain the "TOTAL NO. OF CHANNELS" or "CHANNELS TO TRIP" columns. This changes the CTS by moving the information of the "TOTAL NO. OF CHANNELS" and "CHANNELS TO TRIP" columns to the Bases			
3.3.4 LA02	Table 4.3-1 Note 8	CTS Table 4.3-1 Functional Unit 12 requires the performance of a CHANNEL FUNCTIONAL TEST of the CRD trip breakers and associated Note 8 states that the test shall independently verify the OPERABILITY of both the undervoltage and shunt trip devices of the reactor trip breakers. ITS SR 3.3.4.1 requires the performance of a CHANNEL FUNCTIONAL TEST of the CRD trip breakers but does not specify the details of the test. This changes the CTS by removing details on the scope of the CHANNEL FUNCTIONAL TEST from the CTS and placing the information in the Bases.	ITS Bases	Technical Specification Bases Control Program	3
3.3.5 LA01	Table 3.3-3 Total No. of Units and Units to Trip columns	CTS Table 3.3-3 for SFAS instrumentation has three columns stating various requirements for each instrument string. These columns are labeled, "TOTAL NO. OF UNITS," "UNITS TO TRIP," and "MINIMUM UNITS OPERABLE." ITS Table 3.3.5-1 does not retain the "TOTAL NO. OF UNITS" or "UNITS TO TRIP" columns. This changes the CTS by moving the information of the "TOTAL NO. OF UNITS" and "UNITS TO TRIP" columns to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.3.5 LA02	Table 3.3-3 Notes * and **	CTS Table 3.3-3 Note * applies to the Reactor Coolant System Pressure - Low channels while CTS Table 3.3-3 Note ** applies to the Reactor Coolant System - Low Low channels. CTS Table 3.3-3 Note * states that the bypass	ITS Bases	Technical Specification Bases Control Program	1

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ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		shall be automatically removed when RCS pressure exceeds 1800 psig. CTS Table 3.3-3 Note ** states that the bypass shall be automatically removed when RCS pressure exceeds 660 psig. This changes the CTS by moving the detail that the trip is automatically bypassed from the Specification to the Bases.			
3.3.5 LA03	Table 3.3-4 Note ##	CTS Table 3.3-4 specifies the Allowable Values for the SFAS Instrumentation Instrument Strings and the table includes a Note ## that states the Allowable Values are specified for the CHANNEL FUNCTIONAL TEST. ITS Table 3.3.5-1 only provides the Allowable Value. This changes the CTS by moving the details that the specified Allowable Value is for the CHANNEL FUNCTIONAL TEST from the Technical Specifications to the Bases.	ITS Bases	Technical Specification Bases Control Program	3
3.3.5 LA04	Table 3.3-1 Functional Unit 5.b (including footnote *****), Table 3.3-3 Action 14, Table 3.3-4, Table 4.3-2	CTS Table 3.3-1 Functional Unit 5.b, including footnote *****, provides the LCO requirements for the Pressurizer Heaters interlock channels. CTS Table 3.3-3 Action 14 provides the actions if a pressurizer heater interlock channel is inoperable. CTS Table 3.3-4 provides the Allowable Value for the Pressurizer Heater interlock channels. CTS Table 4.3-2 provides the Surveillance Requirements for the Pressurizer Heater interlock channels. ITS 3.5.2 does not include any Pressurizer Heater interlock channel requirements. This changes the CTS by moving the Pressurizer Heater interlock channel requirements, including the LCO, Actions, Allowable Values, and Surveillance Requirements to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	1
3.3.5	4.3.2.1.2	CTS 4.3.2.1.2 states the logic for the RCS pressure	ITS Bases	Technical	1

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LA05		operating bypasses shall be demonstrated OPERABLE during the at power CHANNEL FUNCTIONAL TEST of functional units affected by the RCS pressure operating bypass operation. The CTS further states that this RCS pressure operating bypass function shall be demonstrated OPERABLE at least once per REFUELING INTERVAL during CHANNEL CALIBRATION testing of each functional unit affected by the RCS pressure operating bypass operation. ITS 3.3.5 does not include this Surveillance Requirement. This changes the CTS by moving the detail of the shutdown bypass testing to the Bases.		Specification Bases Control Program	
3.3.6 LA01	Table 3.3-3 Total No. of Units and Units to Trip columns	CTS Table 3.3-3 for SFAS instrumentation has three columns stating various requirements for each instrument string. These columns are labeled, "TOTAL NO. OF UNITS," "UNITS TO TRIP," and "MINIMUM UNITS OPERABLE." ITS 3.3.6 does not retain the "TOTAL NO. OF UNITS" or "UNITS TO TRIP" columns. This changes the CTS by moving the information of the "TOTAL NO. OF UNITS" and "UNITS TO TRIP" columns to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.3.6 LA02	Table 3.3-3 Functional Unit 3.a, Table 4.3-2 Functional Unit 3.a	CTS Table 3.3-3 Functional Unit 3.a and CTS Table 4.3-2 Functional Unit 3.a specify requirements for the "SFAS (Except Containment Spray and Emergency Sump Recirculation)" Manual Actuation Functional Unit. ITS 3.3.6 part a specifies requirements for the SFAS Manual Initiation Function. This changes the CTS by moving the information of "Except Containment Spray and Emergency Sump Recirculation" to the Bases.	ITS Bases	Technical Specification Bases Control Program	1

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3.3.7 LA01	Table 3.3-3 Total No. of Units and Units to Trip columns	CTS Table 3.3-3 for SFAS instrumentation has three columns stating various requirements for each instrument string. These columns are labeled, "TOTAL NO. OF UNITS," "UNITS TO TRIP," and "MINIMUM UNITS OPERABLE." ITS 3.3.7 does not retain the "TOTAL NO. OF UNITS" or "UNITS TO TRIP" columns. This changes the CTS by moving the information of the "TOTAL NO. OF UNITS" and "UNITS TO TRIP" columns to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.3.7 LA02	Table 3.3-3 Functional Unit 2, Table 4.3-2 Functional unit 2	CTS Table 3.3-3 includes requirements that 2 channels of Incident Level 1 through 5 output logic shall be OPERABLE (CTS Table 3.3-3 Functional Unit 2, Output Logic, Parts a through e). It also states that Incident Level 1 includes Containment Isolation, Incident Level 2 includes High Pressure Injection and Starting Diesel Generators, Incident Level 3 includes Low Pressure Injection, Incident Level 4 includes Containment Spray, and Incident Level 5 includes Sump Recirculation Permissive. CTS Table 4.3-2 also identifies the incident levels and the associated SFAS Functions. ITS LCO 3.3.7 requires all the SFAS automatic logics to be OPERABLE. This changes the CTS by moving the details of the design (number of channels, incident levels, and associated SFAS Functions) from the Specification to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.3.8 LA01	Table 3.3-3 Total No. of Units and Units to Trip columns	CTS Table 3.3-3 specifies the "TOTAL NO. OF UNITS" and "UNITS TO TRIP" for the Degraded Voltage and Loss of Voltage Functional Units. ITS 3.3.8 does not include these details. This changes the CTS by moving the information of the "TOTAL NO. OF UNITS" and	ITS Bases	Technical Specification Bases Control Program	1

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3.3.8 LA02	Table 3.3-3 Functional Units 4.b and 4.c, Table 3.3-4 Functional Units 4.b and 4.c, Table 4.3-2 Functional Units 4.b and 4.c	"UNITS TO TRIP" columns to the ITS Bases. CTS Table 3.3-3 Functional Unit 4.b specifies requirements for the "Essential Bus Feeder Breaker Trip Degraded Voltage Relay (DVR)" units. CTS Table 3.3-3 Functional Unit 4.c specifies requirements for the "Diesel Generator Start, Load Shed on Essential Bus Loss of Voltage Relay (LVR)" units. CTS Table 3.3-4 and CTS Table 4.3-2 specify other requirements for the same Functional Units. ITS LCO 3.3.8 requires the Loss of Voltage Function and the Degraded Voltage Function Emergency Diesel Generator (EDG) Loss of Power Start (LOPS) instrumentation to be OPERABLE. This changes the CTS by moving the information that the Degraded Voltage channel trips the essential bus feeder breaker and that the channel includes a Degraded Voltage "relay" to the Bases. This change also moves the information that the Loss of Voltage instrumentation starts the diesel generator and causes a load shed of essential bus and that the channel includes a degraded voltage "relay" to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.3.9 LA01	Table 3.3-1 Total No. of Channels column	CTS Table 3.3-1 for RPS instrumentation has three columns stating various requirements for each function. These columns are labeled, "TOTAL NO. OF CHANNELS," "CHANNELS TO TRIP," and "MINIMUM CHANNELS OPERABLE." ITS LCO 3.3.9 does not retain the "TOTAL NO. OF CHANNELS" or "CHANNELS TO TRIP" columns. For the Source Range Neutron Flux and Rate channels the "CHANNELS TO TRIP" value is N/A. This changes the CTS by moving the information of the "TOTAL NO. OF CHANNELS" column to the Bases.	ITS Bases	Technical Specification Bases Control Program	1

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3.3.9 LA02	Tables 3.3-1 and 4.3-1 Functional Unit 11	CTS Table 3.3-1 and CTS Table 4.3-1 require Source Range "Neutron Flux" and "Rate" Functions to be OPERABLE. ITS LCO 3.3.9 requires the source range neutron flux channels to be OPERABLE. This changes the CTS by moving the detail that the channels require "Neutron Flux" level and "Rate" from the Specification to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.3.9 LA03	Table 4.3-1 Note 5	CTS Table 4.3-1 Note 5 applies to the source range neutron flux channels and requires verification of at least one decade of overlap with the intermediate range neutron flux channels prior to each reactor startup if not performed in the previous 7 days. This test is not included in ITS 3.3.9. This changes the CTS by moving the source range neutron flux/intermediate range neutron flux overlap test from the Specification to the Bases in the form of a discussion that the CHANNEL CHECK agreement criteria "includes an expectation of one decade of overlap when transitioning between the source range neutron flux instrumentation and intermediate range neutron flux instrumentation during a reactor startup."	ITS Bases	Technical Specification Bases Control Program	4
3.3.10 LA01	Table 3.3-1 Total No. of Channels column	CTS Table 3.3-1 for RPS instrumentation has three columns stating various requirements for each function. These columns are labeled, "TOTAL NO. OF CHANNELS," "CHANNELS TO TRIP," and "MINIMUM CHANNELS OPERABLE." ITS LCO 3.3.9 does not retain the "TOTAL NO. OF CHANNELS" or "CHANNELS TO TRIP" columns. For the Intermediate Range Neutron Flux and Rate channels the "CHANNELS TO TRIP" value is N/A. This changes the CTS by moving the	ITS Bases	Technical Specification Bases Control Program	1

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		information of the "TOTAL NO. OF CHANNELS" column to the Bases.			
3.3.10 LA02	Tables 3.3-1 and 4.3-1 Functional Unit 10	CTS Table 3.3-1 and CTS Table 4.3-1 require Intermediate Range "Neutron Flux" and "Rate" Functions to be OPERABLE. ITS LCO 3.3.10 requires the intermediate range neutron flux channels to be OPERABLE. This changes the CTS by moving the detail that the channels require "Neutron Flux" level and "Rate" from the Specification to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.3.10 LA03	Table 4.3-1 Note 5	CTS Table 4.3-1 Note 5 applies to the intermediate range neutron flux channels and requires verification of at least one decade of overlap with the source range neutron flux channels prior to each reactor startup if not performed in the previous 7 days. This test is not included in ITS 3.3.10. This changes the CTS by moving the intermediate range neutron flux/source range neutron flux overlap test from the Specification to the Bases in the form of a discussion that the CHANNEL CHECK agreement criteria "includes an expectation of one decade of overlap when transitioning between the source range neutron flux instrumentation and intermediate range neutron flux instrumentation during a reactor startup."	ITS Bases	Technical Specification Bases Control Program	4
3.3.11 LA01	Table 3.3-12 Trip Setpoints column, including Notes 1 and 2, 3.3.2.2 Action a	CTS LCO 3.3.2.2 requires the SFRCS instrumentation trip setpoints to be set consistent with the values shown in the Trip Setpoint column of Table 3.3-12, with the exception of the Steam Generator Level-Low Functional Unit which shall be set consistent with the Allowable Value column of Table 3.3-12. CTS 3.3.2.2 Action a is	TRM	10 CFR 50.59	3

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		<p>required to be entered when the setpoint is less conservative than the Allowable Value. The channel is to be declared inoperable until adjusted consistent with Table 3.3-12 (consistent with the LCO). CTS Table 3.3-12 specifies the Trip Setpoints and Allowable Values for the SFRCS Instrumentation Functional Units. CTS Table 3.3-12 Note 1 applies to the Functional Unit 2 (Steam Generator Level – Low) and states that the “Actual water level above, the lower steam generator tube sheet.” CTS Table 3.3-12 Note 2 applies to the Functional Unit 3 (Steam Generator Feedwater Differential Pressure – High) and states “Where differential pressure is steam generator minus feedwater pressure.” ITS 3.3.11 requires the SFRCS instrumentation for each Function in Table 3.3.11-1 to be OPERABLE. ITS Table 3.3.11-1 specifies the Allowable Values for the SFRCS Instrumentation Functions. This changes the CTS by moving the Trip Setpoints and associated requirements and Notes to the Technical Requirements Manual (TRM).</p>			
3.3.11 LA02	4.3.2.2.3 Note *	<p>CTS 4.3.2.2.3 specifies that the Steam and Rupture Control System Response Time of each SFRCS function shall be demonstrated to be within the limit. This statement is modified by a Note * which states, in part, that the Main Steam Line Isolation Valves (MSIVs) response time is to be the time elapsed from the monitored variable exceeding the trip setpoint until the MSIV is fully closed. The Turbine Stop Valves (TSVs) response time is to be the time elapsed from the main steam line low pressure trip condition until the TSV is</p>	TRM	10 CFR 50.59	3

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		fully closed. ITS Table 3.3.11-1 does not contain this information. This changes the CTS by moving the procedural details on the SFRCS RESPONSE TIME testing from the Technical Specifications to the Technical Requirements Manual (TRM).			
3.3.11 LA03	Table 3.3-11 Total No. of Channels and Channels to trip columns	CTS Table 3.3-11 for SFRCS instrumentation has three columns stating various requirements for each function. These columns are labeled, "TOTAL NO. OF CHANNELS," "CHANNELS TO TRIP," and "MINIMUM CHANNELS OPERABLE." ITS Table 3.3.11-1 does not retain the "TOTAL NO. OF CHANNELS" or "CHANNELS TO TRIP" columns. This changes the CTS by moving the information of the "TOTAL NO. OF CHANNELS" and "CHANNELS TO TRIP" columns to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.3.11 LA04	Table 3.3-11 Functional Units 1, 2, and 3	CTS Table 3.3-11 specifies the Functional Unit 1 (Main Steam Pressure Low Instrument Channels) channel instrument numbers to be PS 3689B Steam Line 1 Channel 1; PS 3689D Steam Line 2 Channel 1; PS 3689F Steam Line 1 Channel 1; PS 3689H Steam Line 2 Channel 1; PS 3687A Steam Line 2 Channel 2; PS 3687C Steam Line 1 Channel 2; PS 3687E Steam Line 2 Channel 2; PS 3687G Steam Line 1 Channel 2. CTS Table 3.3-11 specifies the Functional Unit 2 (Feedwater/Steam Generator Differential Pressure-High Instrument Channels) specifies channel instrument numbers to be PDS 2685A Feedwater/Steam Generator 2 Channel 2; PDS 2685B Feedwater/Steam Generator 2 Channel 2; PDS 2685C Feedwater/Steam Generator 2 Channel 1; PDS 2685D Feedwater/Steam Generator 2 Channel 1; PDS 2686A Feedwater/Steam Generator 1	ITS Bases	Technical Specification Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		Channel 1; PDS 2686B Feedwater/Steam Generator 1 Channel 1; PDS 2686C Feedwater/Steam Generator 1 Channel 2; and PDS 2686D Feedwater/Steam Generator 1 Channel 2. CTS Table 3.3-11 specifies the Functional Unit 3 (Steam Generator Level- Low Instrument Channels) specifies channel instrument numbers to be LSLL SP9B8 Steam Generator 1 Channel 1; LSLL SP9B9 Steam Generator 1 Channel 1; LSLL SP9A6 Steam Generator 2 Channel 1; LSLL SP9A7 Steam Generator 2 Channel 1; LSLL SP9A8 Steam Generator 2 Channel 2; LSLL SP9A9 Steam Generator 2 Channel 2; LSLL SP9B6 Steam Generator 1 Channel 2; and LSLL SP9B7 Steam Generator 1 Channel 2. ITS 3.3.11 does not specify the instrument numbers for these Functions. This changes the CTS by moving the instrument numbers and where the instrument channels provide input (i.e., Channel 1 or 2) to the Bases.			
3.3.11 LA05	Table 3.3-11 Note *	CTS Table 3.3-11 Note * applies to the Functional Unit 1 (Main Steam Pressure Low) instrument channels and states that the channels may be bypassed when steam pressure is below 750 psig. CTS Table 3.3-11 Note * also states "Bypass shall be automatically removed when the steam pressure exceeds 800 psig." ITS 3.3.11 does not include this detail that the removal of the bypass is automatic. This changes the CTS by moving the detail that the trip is automatically removed from bypass to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.3.11 LA06	Table 3.3-12 Functional Unit 4 Note #	CTS Table 3.3-12 specifies the Allowable Values for SFRCS Instrumentation Functional Unit 4 and includes Note #, which states the Allowable Value is specified for	ITS Bases	Technical Specification Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		the CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION. ITS Table 3.3.11-1 only provides the Allowable Value. This changes the CTS by moving the details that the specified Allowable Value is for the CHANNEL FUNCTIONAL TEST and the CHANNEL CALIBRATION to the Bases in the form of a general discussion of the Allowable Value and trip setpoint.			
3.3.11 LA07	4.3.2.2.2	CTS 4.3.2.2.2 states the logic for the shutdown bypass shall be demonstrated OPERABLE during the at power CHANNEL FUNCTIONAL TEST of channels affected by bypass operation. The CTS further states that the shutdown bypass function shall be demonstrated OPERABLE at least once per REFUELING INTERVAL during CHANNEL CALIBRATION testing of each channel affected by bypass operation. ITS 3.3.11 does not include this specific Surveillance Requirements. This changes the CTS by moving the detail of the shutdown bypass testing to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.3.12 LA01	Table 3.3-11 Total No. of Channels and Channels to trip columns	CTS Table 3.3-11 for SFRCS instrumentation has three columns stating various requirements for each function. These columns are labeled, "TOTAL NO. OF CHANNELS," "CHANNELS TO TRIP," and "MINIMUM CHANNELS OPERABLE." ITS 3.3.12 does not retain the "TOTAL NO. OF CHANNELS" or "CHANNELS TO TRIP" columns. This changes the CTS by moving the information of the "TOTAL NO. OF CHANNELS" and "CHANNELS TO TRIP" columns to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.3.13 LA01	Table 3.3-11 Total No. of	CTS Table 3.3-11 for SFRCS instrumentation has three columns stating various requirements for each function.	ITS Bases	Technical Specification Bases	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
	Channels and Channels to trip columns	These columns are labeled, "TOTAL NO. OF CHANNELS," "CHANNELS TO TRIP," and "MINIMUM CHANNELS OPERABLE." ITS 3.3.13 does not retain the "TOTAL NO. OF CHANNELS" or "CHANNELS TO TRIP" columns. This changes the CTS by moving the information of the "TOTAL NO. OF CHANNELS" and "CHANNELS TO TRIP" columns to the Bases.		Control Program	
3.3.14 LA01	Table 3.3-6 Alarm/Trip Setpoint column	CTS Table 3.3-6 for the Fuel Storage Pool Area Emergency Ventilation System Actuation channels specifies an "ALARM/TRIP SETPOINT" and the measurement range of the instrumentation. ITS 3.3.14 does not retain this information. This changes the CTS by moving the information that the channel provides an alarm function at the trip setpoint and the measurement range of the instrumentation to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.3.16 LA01	Table 3.3-17 Total No. of Channels and Channels to Trip columns, Tables 3.3-17 and 4.3-17 footnote (a)	CTS Table 3.3-17 for Anticipatory Reactor Trip System Instrumentation has three columns stating various requirements for each function. These columns are labeled, "TOTAL NO. OF CHANNELS," "CHANNELS TO TRIP," and "MINIMUM CHANNELS OPERABLE." CTS Table 3.3-17 Functional Unit 1 (Turbine Trip), CHANNELS TO TRIP column, and CTS Table 4.3-17 Functional Unit 1 also include footnote (a), which states that the Turbine Trip Function is automatically bypassed below 45% RTP. ITS Table 3.3.16-1 does not retain the "TOTAL NO. OF CHANNELS" or "CHANNELS TO TRIP" columns, nor the Function 1 automatic bypass description. This changes the CTS by moving the information of the "TOTAL NO. OF CHANNELS" and "CHANNELS TO TRIP" columns and the Functional Unit	ITS Bases	Technical Specification Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		1 automatic bypass description to the Bases.			
3.3.18 LA01	Tables 3.3-9 and 4.3-6	CTS 3.3.3.5.1 requires the remote shutdown monitoring instrumentation channels in Table 3.3-9 to be OPERABLE. CTS Table 3.3-9 lists each of the required remote shutdown monitoring instruments, the measurement range of each instrument, the location of the remote shutdown monitoring instrumentation readout, and the minimum number of channels required for each instrument. CTS Table 4.3-6 lists the required remote shutdown monitoring instruments and their associated Surveillance Requirements. ITS LCO 3.3.18 states that the remote shutdown monitoring instrumentation Functions shall be OPERABLE. This changes the CTS by moving the details in Tables 3.3-9 and 4.3-6, with the exception of the Surveillance Requirements, from the Technical Specifications to the ITS Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.3.18 LA02	3.3.3.5.1	CTS 3.3.3.5.1 states that the remote shutdown monitoring instrumentation channels shown in Table 3.3-9 shall be OPERABLE "with readouts displayed external to the control room." ITS LCO 3.3.18 states that the remote shutdown monitoring instrumentation Functions shall be OPERABLE. This changes the CTS by moving the requirement for readouts displayed external to the control room from the Technical Specifications to the ITS Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.4.1 LA01	Table 3.2-2 Note 3	CTS Table 3.2-2 Note (3) states, in part, that "These minimum required measured flows include a flow rate uncertainty of 2.5%." ITS 3.4.1 does not include this	ITS Bases	Technical Specification Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		specific detail. The details of the Note are moved to the Bases of the applicable Surveillance, ITS SR 3.4.1.4. This changes the CTS by moving the details in CTS Table 3.2-2 Note (3) to the Bases.			
3.4.3 LA01	3.4.9.1	CTS 3.4.9.1 states that the RCS (except the pressurizer) temperature and pressure shall be limited. The LCO also contains limits on RCS heatup and cooldown rates. ITS 3.4.3 states that the RCS pressure, RCS temperature, and RCS heatup and cooldown rates shall be maintained within limits. This changes the CTS by moving the exclusion of the pressurizer from the LCO to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.4.3 LA02	3.4.9.1 3.4.9.1.a 3.4.9.1.b Figures 3.4-2, 3.4-3, and 3.4-4	CTS 3.4.9.1 states, in part, that the Reactor Coolant system temperature and pressure shall be limited in accordance with the limits lines shown on Figures 3.4-2, 3.4-3, and 3.4-4. Additionally, CTS 3.4.9.1.a and 3.4.9.1.b specify the maximum heatup rate and the maximum cooldown rates, respectively. ITS 3.4.3 states that the RCS pressure, RCS temperature, and RCS heatup and cooldown rate shall be maintained within the limits specified in the PTLR. This changes the CTS by relocating the Figures and the maximum heatup and maximum cooldown rates to the PTLR.	PTLR	10 CFR 50.59	4
3.4.3 LA03	3.4.9.1 Action	CTS 3.4.9.1 Action states that with any P/T limits exceeded, to perform an engineering evaluation to determine the effects of the out-of-limit condition on the integrity of the RCS. ITS 3.4.3 ACTIONS A and C, in part, state that with the requirements of the LCO not met, to determine the RCS is acceptable for continued	ITS Bases	Technical Specification Bases Control Program	3

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		operation. The specific requirement to perform an engineering evaluation is not included in ITS 3.4.3. This changes the CTS by moving the requirement to "perform an engineering evaluation" to determine the effects of the out-of-limit condition on the integrity of the RCS to the Bases.			
3.4.4 LA01	4.4.1.1.1	CTS 4.4.1.1.1 states that the required reactor coolant loops shall be verified to be in operation and circulating reactor coolant at least once per 12 hours. ITS SR 3.4.4.1 states that each RCS loop shall be verified to be in operation every 12 hours. This changes the CTS by moving the Surveillance Requirement detail to verify that the reactor coolant loops are circulating reactor coolant to the Bases.	ITS Bases	Technical Specification Bases Control Program	3
3.4.5 LA01	3.4.1.2.a.1 3.4.1.2.a.2	CTS 3.4.1.2.a.1 and 3.4.1.2.a.2 contain a description of what constitutes an OPERABLE coolant loop. ITS 3.4.5 does not include this description of what constitutes an OPERABLE coolant loop. This changes the CTS by moving the details of what constitutes an OPERABLE coolant loop to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.4.5 LA02	4.4.1.2.3	CTS 4.4.1.2.3 states that the required coolant loops shall be verified to be in operation and circulating reactor coolant at least once per 12 hours. ITS SR 3.4.5.1 states that one RCS loop shall be verified to be in operation every 12 hours. This changes the CTS by moving the Surveillance Requirement details, to verify that the coolant loops are circulating reactor coolant to the Bases.	ITS Bases	Technical Specification Bases Control Program	3

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.4.6 LA01	3.4.1.2.a 3.4.1.2.c	CTS 3.4.1.2.a and 3.4.1.2.c contain a description of what constitutes an OPERABLE coolant loop. ITS 3.4.6 does not include this description of what constitutes an OPERABLE coolant loop. This changes the CTS by moving the details of what constitutes an OPERABLE coolant loop to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.4.6 LA02	4.4.1.2.3	CTS 4.4.1.2.3 states that the required coolant loops shall be verified to be in operation and circulating reactor coolant at least once per 12 hours. ITS SR 3.4.6.1 states that the required DHR or RCS loop shall be verified to be in operation every 12 hours. This changes the CTS by moving the Surveillance Requirement detail to verify that the coolant loops are circulating reactor coolant to the Bases.	ITS Bases	Technical Specification Bases Control Program	3
3.4.7 LA01	3.4.1.2.a 3.4.1.2.c	CTS 3.4.1.2.a and 3.4.1.2.c contain a description of what constitutes an OPERABLE coolant loop. ITS 3.4.7 does not include this description of what constitutes an OPERABLE coolant loop. This changes the CTS by moving the details of what constitutes an OPERABLE coolant loop to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.4.7 LA02	4.4.1.2.3	CTS 4.4.1.2.3 states that the required coolant loops shall be verified to be in operation and circulating reactor coolant at least once per 12 hours. ITS SR 3.4.7.1 states that the required DHR loop shall be verified to be in operation every 12 hours. This changes the CTS by moving the Surveillance Requirement to verify that the coolant loops are circulating reactor coolant to the Bases.	ITS Bases	Technical Specification Bases Control Program	3
3.4.8	3.4.1.2.a	CTS 3.4.1.2.a and 3.4.1.2.c contain a description of what	ITS Bases	Technical	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
LA01	3.4.1.2.c	constitutes an OPERABLE coolant loop. ITS 3.4.8 does not include this description of what constitutes an OPERABLE coolant loop. This changes the CTS by moving the details of what constitutes an OPERABLE coolant loop to the Bases.		Specification Bases Control Program	
3.4.8 LA02	4.4.1.2.3	CTS 4.4.1.2.3 states that the required coolant loops shall be verified to be in operation and circulating reactor coolant at least once per 12 hours. ITS SR 3.4.8.1 states that the required DHR loop shall be verified to be in operation every 12 hours. This changes the CTS by moving the Surveillance Requirement to verify that the coolant loops are circulating reactor coolant to the Bases.	ITS Bases	Technical Specification Bases Control Program	3
3.4.10 LA01	3.4.3 footnote *	CTS LCO 3.4.3 is modified by a note (footnote *) that states that the pressurizer safety valves lift setting pressure shall correspond to ambient conditions of the valve at nominal operating temperature and pressure. This information is not provided in ITS 3.4.10. This changes the CTS by moving this information to the Bases.	ITS Bases	Technical Specification Bases Control Program	3
3.4.11 LA01	3.4.3	CTS 3.4.3 provides the trip setpoint for pilot operated relief valve (PORV). ITS 3.4.11 does not retain this detail. This changes the CTS by moving the details of the trip setpoint to the Bases	ITS Bases	Technical Specification Bases Control Program	1
3.4.11 LA02	3.4.3, including footnote ** 4.4.3	CTS 3.4.3 provides the Allowable Value for PORV opening and footnote ** states that this Allowable Value is for the CHANNEL CALIBRATION. CTS 4.4.3 requires a CHANNEL CALIBRATION of the pressurizer pilot operated relief valve (PORV) each REFUELING	TRM	10 CFR 50.59	4

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		INTERVAL. ITS 3.4.11 does not retain these requirements. This changes the CTS by moving the CHANNEL CALIBRATION and associated Allowable Value to the Technical Requirements Manual (TRM).			
3.4.12 LA01	3.4.2 footnote * 3.4.2 Action c 4.4.2 Figures 3.4-2a and 3.4-2b	CTS 3.4.2 is modified by a note (footnote *) that states that the decay heat removal relief valve lift setting pressure shall correspond to normal operating temperature and pressure. CTS LCO 3.4.2, Actions A, B, and C, and Surveillance Requirement 4.4.2 provides specific valve numbers for certain Decay Heat Removal System valves. CTS 3.4.2 Action c requires power to the valve operators be removed at the motor control centers. CTS Figures 3.4-2a and 3.4-2b (used when a Decay Heat Removal System relief valve is inoperable) include a Note that states the Figures are not corrected for instrument error. ITS 3.4.12 does not include these details. Furthermore, ITS 3.4.12 uses the plant specific names for the associated valves, and requires control power to be removed from the RCS to DHR system isolation valves. This changes the CTS by moving the valve numbers, the information concerning the lift settings, the details concerning how to remove power from the valves, and that the Figures are not corrected for instrument error to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.4.14 LA01	3.4.6.2.f 4.4.6.2.2 Table 3.4-2	CTS 3.4.6.2.f requires the leakage from each RCS PIV specified in Table 3.4-2 to be < 5 gpm. CTS 4.4.6.2.2, the Surveillance which checks the RCS PIV leakage, also references Table 3.4-2. CTS Table 3.4-2 contains a list of the RCS PIVs and their associated valve numbers. ITS 3.4.14 does not contain a list of the RCS PIVs or	ITS Bases	Technical Specification Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		their associated valve numbers. This changes the CTS by relocating the list of RCS PIVs and their associated valve numbers to the Bases.			
3.4.14 LA02	Table 3.4-2 notes b and c	CTS Table 3.4-2 is modified by Notes (b) and (c). Note (b) describes the pressure at which the RCS PIVs are to be tested. Note (c) explains an alternative method of testing the PIVs to satisfy the ALARA requirements. ITS 3.4.14 does not retain these Notes. This changes the CTS by relocating the information in the Notes to the Bases	ITS Bases	Technical Specification Bases Control Program	3
3.4.14 LA03	Table 3.3-3 Action 13 4.5.2.d.1 Table 3.3-4 footnote *	CTS Table 3.3-3 Action 13 and CTS 4.5.2.d.1 provide the specific valve numbers for the decay heat removal isolation valves. CTS Table 3.3-4 footnote * states that the Decay Heat Removal System interlock function Allowable Value is referenced to the RCS pressure instrumentation tap. ITS 3.4.14 does not include these details. This changes the CTS by moving the valve numbers and information concerning the Allowable Value reference point to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.4.15 LA01	3.4.6.1.a 3.4.6.1 Action a 4.4.6.1.b	CTS 3.4.6.1.a states that the containment sump monitoring system includes both "level and flow." In addition, CTS 3.4.6.1 Action a and CTS 4.4.6.1.b both include "level and flow" when referring to the containment sump monitoring system. ITS 3.4.15 requires the containment sump monitor to be OPERABLE, but the details of what constitutes an OPERABLE monitor are moved to the Bases. This changes the CTS by moving the details of what constitutes an OPERABLE containment sump monitor to	ITS Bases	Technical Specification Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.4.15 LA02	Table 3.3-6 Instrument 2	the Bases. CTS Table 3.3-6 provides the measurement range for the gaseous and particulate containment atmosphere radioactivity monitors. ITS 3.4.15 requires either the gaseous or particulate containment atmosphere radioactivity monitor to be OPERABLE, but the details concerning their measurement range are not included. This changes the CTS by moving the details of the measurement ranges for the gaseous and particulate containment atmosphere radioactivity monitors to the UFSAR, where it currently exists.	UFSAR	10 CFR 50.59	1
3.4.16 LA01	Table 4.4-4 Items 2 and 4	CTS Table 4.4-4 Item 2 requires an isotopic analysis to determine whether DOSE EQUIVALENT I-131 concentration is within limit. CTS Table 4.4-4 Item 4 requires an isotopic analysis for iodine including I-131, I-133, and I-135. ITS SR 3.4.16.2 requires the verification that reactor coolant DOSE EQUIVALENT I-131 specific activity is within limit. ITS 3.4.16 Required Action A.1 requires the verification that DOSE EQUIVALENT I-131 is within the acceptable region of Figure 3.4.16-1. This changes the CTS by moving the detail that an "Isotopic Analysis" or "Isotopic Analysis for Iodine Including I-131, I-133, and I-135" must be performed to satisfy the requirements of the Surveillances to the Bases.	ITS Bases	Technical Specification Bases Control Program	3
3.5.1 LA01	4.5.1.c	CTS 4.5.1.c specifies that each CFT shall be demonstrated OPERABLE by verifying that the power to the isolation valve operator is disconnected "by locking the breaker in the open position" once per 31 days. ITS	ITS Bases	Technical Specification Bases Control Program	3

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		SR 3.5.1.5 requires the same verification, but does not specify the manner in which to remove power. This changes the CTS by moving the procedural detail of power removal to the Bases.			
3.5.2 LA01	LCO 3.5.2	CTS LCO 3.5.2 states that two "independent" ECCS subsystems shall be OPERABLE and contains a description of what constitutes an OPERABLE subsystem. ITS 3.5.2 requires two ECCS trains to be OPERABLE, but the details of what constitutes an OPERABLE train are moved to the Bases. This changes the CTS by moving the details of what constitutes an OPERABLE train to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.5.2 LA02	NA	Not used.	NA	NA	NA
3.5.2 LA03	4.5.2.c	CTS 4.5.2.c requires a visual inspection for loose debris in containment for all accessible areas of containment prior to establishing containment integrity, and for all areas of containment affected by an entry, daily while work is ongoing and again during the final exit after completion of work when containment integrity is established. ITS 3.5.2 does not include this requirement. This changes the CTS by moving this requirement to the Technical Requirement Manual (TRM).	TRM	10 CFR 50.59	4
3.5.2 LA04	4.5.2.d.2.b	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	ITS Bases	Technical Specification Bases Control Program	3

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		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.a only requires verification that each BWST outlet valve and containment emergency sump valve actuate to the correct position on a manual actuation signal. This changes the CTS by moving the details of how to perform the verification to the Bases.			
3.5.2 LA05	NA	Not used.	NA	NA	NA
3.5.2 LA06	4.5.2.e.1 and 2	CTS 4.5.2.e.1 and 4.5.2.e.2 require verification of the automatic actuation of ECCS components on a "safety injection" test signal or "SFAS" test signal, respectively. ITS SR 3.5.2.4 and SR 3.5.2.5 do not state the specific type of signal, but only specify an actual or simulated "actuation" signal. This changes CTS by moving the type of actuation signal (i.e., SFAS) to the Bases. The change to replace "test" with "simulated" and allow both "actual or simulated actuation" signals to be used for these SRs is discussed in DOC L04.	ITS Bases	Technical Specification Bases Control Program	1
3.5.2 LA07	4.5.2.d.1.a	CTS 4.5.2.d.1.a requires, in part, verifying the pressurizer heaters are de-energized on a Decay Heat Removal (DHR) System interlock signal. ITS 3.5.2 does not require verification that the pressurizer heaters are deenergized. This changes the CTS by moving the requirement to verify the pressurizer heaters are deenergized on a DHR System interlock signal to the	TRM	10 CFR 50.59	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		Technical Requirements Manual (TRM).			
3.5.3 LA01	LCO 3.5.3 3.5.3 Action a	CTS LCO 3.5.3 states that one ECCS subsystem shall be OPERABLE and contains a description of what constitutes an OPERABLE subsystem. In addition, CTS 3.5.3 Action a also describes what constitutes an inoperable ECCS subsystem. ITS 3.5.3 requires an ECCS LPI subsystem to be OPERABLE, but the details of what constitutes an OPERABLE LPI subsystem are moved to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.5.4 LA01	LCO 3.5.4.a 4.5.4.a.1	CTS 3.5.4.a requires an available borated water volume of between 500,100 and 550,000 gallons and CTS 4.5.4.a.1 requires verification that the available borated water volume in the BWST is within limits. ITS SR 3.5.4.2 requires verification of the BWST borated water volume, but does not specify that it is the available volume. This changes the CTS by moving the detail of what constitutes the borated water volume to the Bases.	ITS Bases	Technical Specification Bases Control Program	3
3.6.1 LA01	1.8	CTS 1.8 states, in part, "CONTAINMENT INTEGRITY shall exist when: 1.8.a All penetrations required to be closed during accident conditions are either: 1. Capable of being closed by the Safety Features Actuation System, or 2. Closed by manual valves, blind flanges, or deactivated automatic valves secured in their closed positions, except for those approved to be open under administrative controls; 1.8.b The equipment hatch is closed; 1.8.d The containment leakage rates are within the limits specified in the Containment Leakage Rate Testing Program; and 1.8.e The sealing mechanism associated with each penetration (e.g., welds, bellows or	ITS Bases	Technical Specification Bases Control Program	2

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		O-rings) is OPERABLE." ITS 3.6.1 states "Containment shall be OPERABLE." This changes the CTS by moving the reference to penetration and equipment hatch requirements to the Bases.			
3.6.2 LA01	LCO 3.6.1.3.a LCO 3.6.1.3.b	CTS LCO 3.6.1.3.a and 3.6.1.3.b state what constitutes an OPERABLE containment air lock. ITS LCO 3.6.2 does not include this level of detail. This changes the CTS by moving details concerning what constitutes an OPERABLE containment air lock to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.6.2 LA02	3.6.1.3 Actions a and b footnote *	CTS 3.6.1.3 Actions a and b footnote * allows entry and exit through the OPERABLE door if necessary to perform repairs of the affected air lock components. Furthermore, the footnote requires that after each entry and exit, the OPERABLE door must be closed without delay. ITS 3.6.2 ACTIONS Note 1 provides a similar allowance, except the requirement to close the OPERABLE door without delay (after entry or exit), is not included. This changes the CTS by moving this detail to the Bases.	ITS Bases	Technical Specification Bases Control Program	3
3.6.3 LA01	4.6.3.1.2.a	CTS 4.6.3.1.2.a requires verification of the automatic isolation of the containment isolation valves on a "containment isolation" test signal. ITS SR 3.6.3.6 does not state the specific type of signal, but only specifies an actual or simulated "actuation" signal. This changes the CTS by moving the type of actuation signal (e.g., containment isolation) to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.6.3 LA02	4.6.1.2.2 6.16.d.2	CTS 4.6.1.2.2 requires the containment purge and exhaust valve leakage rate to be within the limits specified in the Containment Leakage Rate Testing	ITS Bases	Technical Specification Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		Program. CTS 6.16 provides the requirements for the Containment Leakage Rate Testing Program, and CTS 6.16.d.2 states that the leakage limits for a single containment purge penetration is < 0.15 La. ITS SR 3.6.3.5 requires performance of the containment purge and exhaust valve leakage test, but does not include the value for the leakage limit; it only requires the leakage to be within limits. This changes the CTS by moving the leakage limit to the Bases.			
3.6.3 LA03	4.6.1.2.2	CTS 4.6.1.2.2 requires performance of containment purge and exhaust valve leakage rate testing, and describes that the testing is performed "by pressurizing the piping section including one valve inside and one valve outside the containment to a pressure greater than or equal to 20 psig." ITS SR 3.6.3.5 requires containment purge and exhaust valve leakage rate testing, but does not include the details on how to perform the testing. This changes the CTS by moving the details of how to perform the test to the Bases.	ITS Bases	Technical Specification Bases Control Program	3
3.6.4 LA01	LCO 3.6.1.4	CTS LCO 3.6.1.4 states that containment pressure be maintained between + 25" and - 14" water gauge, relative to the shield building. ITS 3.6.4 includes a similar requirement, but does not specify that it is relative to the shield building. This changes the CTS by moving the detail that the containment pressure limits are relative to the shield building to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.6.5 LA01	4.6.1.5	CTS 4.6.1.5 requires verifying that the primary containment average air temperature "shall be the arithmetical average of the inlet temperature(s) to the	ITS Bases	Technical Specification Bases Control Program	3

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		operating containment air coolers(s) (1-1, 1-2, and 1-3)." ITS SR 3.6.5.1 requires a similar verification, but does not state the specific method for attaining the average air temperature (i.e., the arithmetical average of specific air cooler inlet temperatures location). This changes the CTS by moving the method of calculating the average air temperature to the Bases.			
3.6.6 LA01	LCO 3.6.2.1 LCO 3.6.2.2	CTS 3.6.2.1 states that two "independent" containment spray systems shall be OPERABLE "with each spray system capable of taking suction from the BWST on a containment spray actuation signal and manually transferring suction to the containment emergency sump during the recirculation phase of operation." CTS 3.6.2.2 states that two "independent" containment cooling units shall be OPERABLE. ITS 3.6.6 requires two containment spray trains and two containment air cooling trains to be OPERABLE, but does not include the details of what constitutes OPERABILITY. This changes the CTS by moving the detail that the trains must be "independent" and the description of the capability of the containment spray trains (i.e., taking suction from the BWST on a containment spray actuation signal and manually transferring suction to the containment emergency sump during the recirculation phase of operation) to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.6.6 LA02	4.6.2.1.b.1 4.6.2.1.b.2 4.6.2.2.b	CTS 4.6.2.1.b.1 requires verification of the automatic actuation of containment spray valves on a "containment spray" test signal and CTS 4.6.2.1.b.2 requires the containment spray pumps automatically start on a "SFAS" test signal. CTS 4.6.2.2.b requires each	ITS Bases	Technical Specification Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		containment cooling unit starts on receipt of a "SFAS" test signal. ITS SR 3.6.6.6, SR 3.6.6.7, and SR 3.6.6.4 do not state the specific type of signal, but only specify an actual or simulated "actuation" signal. This changes the CTS by moving the type of actuation signal (e.g., SFAS) to the Bases.			
3.6.6 LA03	4.6.2.1.d	CTS 4.6.2.1.d states to perform "an air or smoke flow test through each spray header" to verify each spray nozzle is unobstructed. ITS SR 3.6.6.8 states to verify each spray nozzle is unobstructed. This changes the CTS by moving the details of how to perform the test to the Bases	ITS Bases	Technical Specification Bases Control Program	3
3.6.6 LA04	4.6.2.2.a.1 4.6.2.2.b	CTS 4.6.2.2.a.1 requires each containment cooling train be started (unless already operating) from the control room every 31 days. CTS 4.6.2.2.b requires verification that each containment cooling train starts "on low speed" upon receipt of an SFAS test signal. ITS SR 3.6.2.2 requires each containment air cooling train be operated for ≥ 15 minutes, but does not specify it be started from the control room. ITS SR 3.6.2.5 requires each containment air cooling train be started on an actuation signal, but does not specify it be started on low speed. This changes the CTS by moving the detail that the trains are started from the control room and started automatically in low speed to the Bases.	ITS Bases	Technical Specification Bases Control Program	3
3.7.1 LA01	3.7.1.1 Action footnote *	Certain portions of CTS 3.7.1.1 Action are modified by footnote *, that states that the MSSV lift setting pressure shall correspond to ambient conditions of the valve at nominal operating temperature and pressure. This	ITS Bases	Technical Specification Bases Control Program	3

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		information is not provided in ITS 3.7.1. This changes the CTS by moving this information to the Bases.			
3.7.5 LA01	LCO 3.7.1.2 LCO 3.7.1.7	CTS LCO 3.7.1.2 requires two trains of auxiliary feedwater, each consisting of an auxiliary feedwater pump and associated flow path to both steam generators, to be OPERABLE. CTS LCO 3.7.1.7 requires the Motor Driven Feedwater Pump and associated flow paths to the Auxiliary Feedwater System to be OPERABLE. ITS LCO 3.7.5 requires three EFW trains to be OPERABLE, consisting of two Auxiliary Feedwater (AFW) trains and the Motor Driven Feedwater Pump (MDFP) train. The ITS does not define the components and associated flow path that comprise an OPERABLE EFW train. This changes the CTS by moving the description of the AFW and MDFP trains to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.7.5 LA02	3.7.1.2 Action b 4.7.1.2.2	CTS 3.7.1.2 Action b provides Action requirements for an inoperable auxiliary feed pump turbine inlet steam pressure interlock which require restoration within 7 days or a unit shutdown. CTS 4.7.1.2.2 provides the Surveillance Requirement for the auxiliary feed pump turbine inlet steam pressure interlocks and requires a CHANNEL FUNCTIONAL TEST every 31 days and a CHANNEL CALIBRATION every refueling interval (24 months). ITS 3.7.5 does not include these requirements. This changes the CTS by moving these requirements to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	4
3.7.5	4.7.1.2.1.b.3	CTS 4.7.1.2.1.b.3 requires verifying certain turbine plant	TRM	10 CFR 50.59	4

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
LA03		cooling water valves and the startup feedwater pump suction and discharge valves are closed. ITS 3.7.5 does not include this Surveillance. This changes the CTS by moving this Surveillance Requirement to the Technical Requirements Manual (TRM).			
3.7.5 LA04	4.7.1.2.1.c.1 4.7.1.2.1.c.2	CTS 4.7.1.2.1.c.1 and 4.7.1.2.1.c.2 require verification that each automatic valve in the AFW flow path actuates to its correct position and each AFW pump starts automatically, respectively, on a Steam and Feedwater Rupture Control Systems (SFRCS) actuation test signal. ITS SR 3.7.5.4 and SR 3.7.5.5 do not state the specific type of signal, but only specify an actual or simulated "actuation" signal. This changes CTS by moving the type of actuation signal (i.e., SFRCS) to the Bases. The change to allow an actual signal is discussed in DOC L06.	ITS Bases	Technical Specification Bases Control Program	1
3.7.5 LA05	4.7.1.2.1.a.1 4.7.1.2.1.c.3 4.7.1.2.1.g.1 4.7.1.7.d.1 4.7.1.7.f.1	CTS 4.7.1.2.1.a.1 requires verifying the differential pressure of the AFW pumps are greater than or equal to the required differential pressure at the specified recirculation flow rate. CTS 4.7.1.2.1.c.3 and 4.7.1.2.1.g.1 require verification that there is a flow path from each auxiliary feedwater pump to both steam generators by pumping water from the Condensate Storage Tank with each pump to both steam generators. They further state that the flow path shall be verified by either steam generator level change or Auxiliary Feedwater Safety Grade Flow Indication, and that the verification of the Auxiliary Feedwater System's flow capacity is not required by these Surveillances. CTS 4.7.1.7.d.1 and 4.7.1.7.f.1 require verification that there	ITS Bases	Technical Specification Bases Control Program	3

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		<p>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. They further state that the flow path to the steam generators shall be verified by either steam generator level change or Auxiliary Feedwater Safety Grade Flow Indication, and that the verification of the Motor Driven Feedwater Pump System flow capacity is not required by these Surveillances. ITS SR 3.7.5.2 requires a similar AFW pump differential pressure test as required by CTS 4.7.1.2.1.a.1, but the requirement that the AFW pumps are at the specified recirculation flow rate is not included. ITS SR 3.7.5.6 requires verification of proper alignment of the required AFW flow paths by verifying flow from the condensate storage tanks to each steam generator. ITS SR 3.7.5.7 requires verification of proper alignment of the required MDFP flow paths by verifying flow from the condensate storage tanks to each steam generator. However the CTS 4.7.1.2.c.3, 4.7.1.2.1.g.1, 4.7.1.7.d.1, and 4.7.1.7.f.1 requirements on the manner to verify flow and that an actual flow capacity check is not required is not included in the ITS. This changes the CTS by moving the requirements to perform the AFW pump differential pressure test at the specified recirculation flow rate, and to verify the flow path by either steam generator level change or Auxiliary Feedwater Safety Grade Flow Indication and that verification of flow capacity is not required to the Bases</p>			
3.7.5 LA06	NA	Not used.	NA	NA	NA

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.7.5 LA07	4.7.1.2.1.e	CTS 4.7.1.2.1.e provides the Surveillance Requirement for the auxiliary feed pump suction pressure interlocks and requires a CHANNEL FUNCTIONAL TEST every 31 days and a CHANNEL CALIBRATION every refueling interval (24 months). ITS 3.7.5 does not include these requirements. This changes the CTS by moving these requirements to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	4
3.7.5 LA08	4.7.1.2.1.b.3	CTS 4.7.1.7.b.3 requires verifying each manual or power operated valve in the MDFP flow path is capable of being repositioned to the correct position when in MODE 1 < 40% RTP and in MODES 2 and 3. It further clarifies that capable of being repositioned is demonstrated by verifying the presence of handwheels for all manual valves and the presence of either a handwheel or an available power supply for power operated valves. ITS SR 3.7.5.1 requires a similar Surveillance, however the manner in which the capability of repositioning the valves is demonstrated is not included. This changes the CTS by moving the details concerning how to demonstrate the capability to reposition the valves to the Bases.	ITS Bases	Technical Specification Bases Control Program	3
3.7.5 LA09	4.7.1.2.1.c.1 4.7.1.7.c.2	CTS 4.7.1.7.c.1 requires verifying proper operation of each power operated and automatic valve in the MDFP train flow path to the AFW System. CTS 4.7.1.7.c.2 requires verifying the MDFP starts from the control room. ITS SR 3.7.5.3 requires operating the MDFP train. This changes the CTS by moving the details of how the Surveillance is conducted to the Bases.	ITS Bases	Technical Specification Bases Control Program	3
3.7.5	4.7.1.2.1.d.2	CTS 4.7.1.7.d.2 provides the Surveillance Requirement	TRM	10 CFR 50.59	4

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
LA010		for the MDPF lube oil interlocks and requires verifying proper operation of the interlocks at least once each refueling interval (24 months). ITS 3.7.5 does not include this Surveillance Requirement. This changes the CTS by moving this requirement to the TRM.			
3.7.6 LA01	3.7.1.3 Action b	CTS 3.7.1.3 Action b requires the Service Water System to be demonstrated as a backup supply to the Auxiliary Feedwater System at least once per 12 hours by verifying that the Service Water System is OPERABLE whenever the Service Water System is the supply source for the Auxiliary Feedwater System. ITS 3.7.6 Required Action A.1 requires the verification of OPERABILITY of a backup water supply. This changes the CTS by moving the detail that the Service Water System provides the backup supply for the Auxiliary Feedwater System from the CTS to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.7.7 LA01	LCO 3.7.3.1	CTS 3.7.3.1 states that two "independent" CCW loops shall be OPERABLE. ITS 3.7.7 requires two CCW loops to be OPERABLE, but does not contain the detail that the loops must be independent. This changes the CTS by moving the detail that the CCW loops are independent to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.7.7 LA02	4.7.3.1.b.1 4.7.3.1.b.2	CTS 4.7.3.1.b.1 and 4.7.3.1.b.2 require verification of the automatic actuation of CCW components on an "SFAS" test signal. ITS SR 3.7.7.2 and SR 3.7.7.3 do not state the specific type of signal, but only specify an actual or simulated "actuation" signal. This changes CTS by moving the type of actuation signal (i.e., SFAS) to the Bases.	ITS Bases	Technical Specification Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.7.8 LA01	LCO 3.7.4.1	CTS 3.7.4.1 states that two "independent" SWS loops shall be OPERABLE. ITS 3.7.8 requires two SWS loops to be OPERABLE, but does not contain the detail that the loops must be independent. This changes the CTS by moving the detail that the SWS loops are independent to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.7.8 LA02	4.7.4.1.b.1 4.7.4.1.b.2	CTS 4.7.4.1.b.1 and 4.7.4.1.b.2 require verification of the automatic actuation of SWS components on an "SFAS" test signal. ITS SR 3.7.8.2 and SR 3.7.8.3 do not state the specific type of signal, but only specify an actual or simulated "actuation" signal. This changes CTS by moving the type of actuation signal (i.e., SFAS) to the Bases	ITS Bases	Technical Specification Bases Control Program	1
3.7.10 LA01	LCO 3.7.6.1	CTS 3.7.6.1 states that two "independent" control room emergency ventilation systems shall be OPERABLE. ITS LCO 3.7.10 states that two CREVS trains shall be OPERABLE. This changes the CTS by moving the details that the CREVS trains are "independent" from the CTS to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.7.10 LA02	4.7.6.1.b	CTS 4.7.6.1.b states that each CREVS train shall be demonstrated OPERABLE by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the train operates for a least 15 minutes. ITS SR 3.7.10.1 states to operate each CREVS train for > 15 minutes. This changes the CTS by moving the details of how the Surveillance is conducted to the Bases.	ITS Bases	Technical Specification Bases Control Program	3
3.7.10 LA03	4.7.6.1.e.2	CTS 4.7.6.1.e.2 requires verification of the automatic isolation of the Control Room Normal Ventilation System	ITS Bases	Technical Specification Bases	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		on an "SFAS" test signal and a "Station Vent Normal Range Radiation monitoring" test signal. ITS SR 3.7.10.3 does not state the specific type of signal, but only specifies an actual or simulated "actuation" signal. This changes CTS by moving the type of actuation signal (i.e., SFAS and Station Vent Normal Range Radiation Monitoring) to the Bases.		Control Program	
3.7.11 LA01	LCO 3.7.6.1	CTS 3.7.6.1 states that two "independent" control room emergency ventilation systems shall be OPERABLE. ITS LCO 3.7.10 states that two Control Room Emergency Air Temperature Control System (CREATCS) trains shall be OPERABLE. This changes the CTS by moving the details that the CREATCS trains are "independent" from the CTS to the Bases. The change from CREVS to CREATCS is discussed in DOC A02.	ITS Bases	Technical Specification Bases Control Program	1
3.7.12 LA01	LCO 3.6.5.2	CTS 3.6.5.1 states that two "independent" emergency ventilation systems shall be OPERABLE. CTS 3.6.5.2 states that the shield building integrity shall be maintained. ITS LCO 3.7.12 states that two Station EVS trains shall be OPERABLE. This changes the CTS by moving the details that the Station EVS trains are "independent" and that the "shield building integrity" must be maintained from the CTS to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.7.12 LA02	4.6.5.1.a 4.6.5.2.2	CTS 4.6.5.1.a states that each EVS train shall be demonstrated OPERABLE by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the train operates for a least 15 minutes. CTS 4.6.5.2.2 requires the shield building	ITS Bases	Technical Specification Bases Control Program	3

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		area negative pressure boundary drawdown test to be "performed with the flow path established prior to starting the EVS fan, and the other dampers associated with the shield building area negative pressure boundary closed." ITS SR 3.7.12.1 states to operate the each Station EVS train for > 15 minutes. ITS SR 3.7.12.4 performs the shield building area negative pressure boundary drawdown test, but does not include the prerequisites (described above) of CTS 4.6.5.2.2. This changes the CTS by moving the details of how the Surveillances are conducted to the Bases.			
3.7.12 LA03	4.6.5.1.d.2	CTS 4.6.5.1.d.2 requires verification of the automatic actuation of the Station EVS trains on a "containment isolation" test signal. ITS SR 3.7.12.3 does not state the specific type of signal, but only specifies an actual or simulated "actuation" signal. This changes CTS by moving the type of actuation signal (i.e., containment isolation) to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.7.12 LA04	Table 4.6-1	CTS Table 4.6-1 contains a list of the shield building area negative pressure boundary airtight doors and blowout panels. ITS 3.7.12 does not contain this list. This changes the CTS by relocating the list of the shield building area negative pressure boundary airtight doors and blowout panels to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	1
3.7.13 LA01	LCO 3.9.12	CTS 3.9.12 states that two "independent" emergency ventilation systems servicing the storage pool area shall be OPERABLE. ITS LCO 3.7.13 states that two Spent Fuel Pool Area EVS trains shall be OPERABLE. This	ITS Bases	Technical Specification Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		changes the CTS by moving the details that the Spent Fuel Pool Area EVS trains are "independent" from the CTS to the Bases.			
3.7.13 LA02	3.9.12 Actions a and b	CTS 3.9.12 Actions a and b, under certain conditions, requires the OPERABLE Spent Fuel Pool Area EVS train to be in operation and "discharging through at least one train of HEPA filters and charcoal adsorbers." Under similar conditions, ITS 3.7.13 Required Action B.1 requires the OPERABLE Spent Fuel Pool EVS train to be placed in operation. This changes the CTS by moving the details of what placing the train in operation entails to the Bases.	ITS Bases	Technical Specification Bases Control Program	3
3.7.13 LA03	3.9.12	CTS 3.9.12, in part, allows CTS 4.9.12.1 not to be met due to both doors of the personnel air lock being open, provided at least one personnel air lock door is capable of being closed and a designated individual is available immediately outside the personnel air lock to close the door. The Note to ITS LCO 3.7.13 also allows the Spent Fuel Pool Area EVS trains to be inoperable due to opening of the boundary under administrative control, but does not include these specific provisions of the allowance. This changes the CTS by moving the details of controlling the open air lock doors (i.e., one is capable of being closed and a designated individual is available immediately outside the personnel air lock to close the door) to the Bases.	ITS Bases	Technical Specification Bases Control Program	3
3.7.13 LA04	4.9.12.2	CTS 4.9.12.2 requires verification that the system "fans stop automatically" and "that dampers automatically divert flow into the emergency ventilation system" on a	ITS Bases	Technical Specification Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		"fuel storage area high radiation" test signal. ITS SR 3.7.13.3 does not state the specific automatic actions or the specific type of signal, but only specifies the Spent Fuel Pool Area EVS "actuates" on an actual or simulated "actuation" signal. This changes CTS by moving the actions when the system actuates and the type of actuation signal to the Bases. The change to replace "test" with "simulated" and allow both "actual or simulated" actuation signals to be used for these SRs is discussed in DOC L07.			
3.7.13 LA05	4.6.5.1.a	CTS 4.6.5.1.a states that each EVS train shall be demonstrated OPERABLE by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the train operates for a least 15 minutes. ITS SR 3.7.13.1 states to operate each Spent Fuel Pool Area EVS train for > 15 minutes. This changes the CTS by moving the details of how the Surveillance is conducted to the Bases.	ITS Bases	Technical Specification Bases Control Program	3
3.7.17 LA01	Table 4.7-2 Item 2	CTS Table 4.7-2 Item 2 requires an isotopic analysis to determine whether DOSE EQUIVALENT I-131 concentration is within limit. ITS SR 3.7.17.1 requires the verification that specific activity of the secondary coolant is within limit ($\leq 0.10 \mu\text{Ci/gm}$ DOSE EQUIVALENT I-131). This changes the CTS by moving the detail that an isotopic analysis must be performed to satisfy the requirements of the Surveillance to the Bases.	ITS Bases	Technical Specification Bases Control Program	3
3.7.18 LA01	LCO 3.7.9.d	CTS 3.7.9.d states that the maximum SG water level in MODE 4 shall be less than or equal to 625 inches full range level. ITS 3.7.18 does not include the MODE 4	ITS Bases	Technical Specification Bases Control Program	3

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		SG water level requirements. This changes the CTS by moving the maximum SG water level detail to the Bases (of ITS 3.4.5 and ITS 3.4.6).			
3/4.7.7 LA01	3.7.7	CTS 3.7.7 provides the requirements for all safety-related snubbers. This specification with the exception of CTS 3.7.7 Action a is not included in the ITS. This changes the CTS by moving the explicit snubber requirements from the Technical Specifications to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	4
3.8.1 LA01	LCO 3.8.1.1.b	CTS LCO 3.8.1.1.b requires two "separate and independent" EDGs to be OPERABLE, each with a "separate" day fuel tank and a "separate fuel transfer pump." ITS LCO 3.8.1 requires two qualified circuits between the offsite transmission network and the onsite Class 1E distribution system and two EDGs capable of supplying the onsite Class 1E distribution subsystem to be OPERABLE. This changes the CTS by moving the details that the EDGs are "separate and independent" from the CTS to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.8.1 LA02	4.8.1.1.2.a.6 4.8.1.1.2.c.6	CTS 4.8.1.1.2.a.6 and 4.8.1.1.2.c.6 require the verification that each EDG is aligned to provide standby power to the associated essential buses. ITS 3.8.1 SRs do not contain this requirement. This changes the CTS by moving the detail that each EDG is aligned to provide standby power to the associated emergency buses from the CTS to the ITS Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.8.1 LA03	4.8.1.1.2.e	CTS 4.8.1.1.2.e requires each EDG to be subjected to an inspection every 30 months (as modified by footnote *) in accordance with procedures prepared in conjunction	TRM	10 CFR 50.59	4

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		with its manufacturer's recommendations for this class of standby service. The ITS does not include this EDG inspection requirement. This changes the CTS by moving the explicit EDG inspection Surveillance from the Technical Specifications to the Technical Requirements Manual (TRM).			
3.8.1 LA04	Table 3.3-3 Functional Unit 4 Total No. of Units and Units to Trip columns	CTS Table 3.3-3 for Functional Unit 4 has three columns stating various requirements for each instrument string. These columns are labeled, "TOTAL NO. OF UNITS," "UNITS TO TRIP," and "MINIMUM UNITS OPERABLE." ITS 3.8.1 does not retain the "TOTAL NO. OF UNITS" or "UNITS TO TRIP" columns. This changes the CTS by moving the information of the "TOTAL NO. OF UNITS" and "UNITS TO TRIP" columns to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.8.2 LA01	LCO 3.8.1.2.b	CTS LCO 3.8.1.2.b specifies that an EDG be OPERABLE with a fuel transfer pump. ITS LCO 3.8.2.b requires an OPERABLE EDG capable of supplying one train of the onsite Class 1E power distribution subsystem(s). This changes the CTS by moving the details that an OPERABLE EDG requires "a fuel transfer pump" from the CTS to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.8.3 LA01	LCO 3.8.1.1.b	CTS LCO 3.8.1.1.b requires a "separate" fuel storage system for each required EDG. ITS LCO 3.8.3 does not state that the fuel oil storage tanks are separate between diesels. This changes the CTS by moving the details of the separate fuel storage system to the ITS Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.8.4 LA01	3.8.2.3	CTS 3.8.2.3 states that the DC bus trains shall be energized and OPERABLE with tie breakers between bus trains open. The details of what constitutes Train A	ITS Bases	Technical Specification Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		and Train B are also listed. Train A consists of 250/125-volt DC MCC1, 125-volt DC station batteries 1P and 1N and 2 full capacity chargers. Train B consists of 250/125-volt DC MCC2, 125-volt DC station batteries 2P and 2N and 2 full capacity chargers. ITS LCO 3.8.4 requires the Train 1 and Train 2 DC electrical power sources to be OPERABLE. This changes the CTS by moving the details of the components of the DC Sources (battery and charger) from the CTS to the Bases. The 250/125-volt DC MCC buses are part of the Distribution System Specification (ITS 3.8.9) and all aspect of the buses are addressed in ITS 3.8.9.			
3.8.4 LA02	4.8.2.3.2.a.2	CTS 4.8.2.3.2.a.2 requires the total battery terminal voltage to be greater than or equal to 129 volts on float charge. ITS SR 3.8.4.1 requires the verification that the battery terminal voltage is greater than or equal to the minimum established float voltage. This changes the CTS by moving the specific value of the minimum established float voltage (129 V) from the CTS to the Bases. Furthermore, the voltage limit is being changed from 129 V to 130.2 V to ensure the float voltage is maintained greater than or equal to the minimum established design limits provided by the manufacturer.	ITS Bases	Technical Specification Bases Control Program	1
3.8.5 LA01	3.8.2.4	CTS 3.8.2.4 states that as a minimum, the following DC electrical equipment and bus shall be energized and OPERABLE. It lists one – 250/125-volt DC MCC, and one 125-volt battery banks and chargers supplying the above DC MCC. ITS LCO 3.8.5 requires One Train 1 or Train 2 DC electrical power source to be OPERABLE. This changes the CTS by moving the details of the	ITS Bases	Technical Specification Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		components of the DC Sources (battery and charger) from the CTS to the Bases. The 250/125-volt DC MCC buses are part of the Distribution System Specification (ITS 3.8.10) and all aspect of the buses are addressed in ITS 3.8.10.			
3.8.6 LA01	4.8.2.3.2	CTS 4.8.2.3.2 requires the average electrolyte temperature to be above 60°F. ITS SR 3.8.6.4 specifies the limit to be greater than or equal to the minimum established design limits. This changes the CTS by relocating the actual value of electrolyte temperature to the ITS Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.8.9 LA01	3.8.2.1 4.8.2.1 3.8.2.3 4.8.2.3.1	CTS LCO 3.8.2.1 requires the AC electrical buses to be OPERABLE "and energized with tie breakers open between redundant busses." CTS 4.8.2.1 also requires the AC buses to be determined OPERABLE "with tie breakers open between redundant busses" by verifying correct breaker alignment and indicated power availability. CTS LCO 3.8.2.3 requires the DC bus trains to be "energized" and OPERABLE "with disconnect switches between bus trains open." CTS 4.8.2.3.1 requires the DC bus trains to be determined OPERABLE "and energized with disconnect switches open between redundant busses" by verifying correct disconnect switch/breaker alignment, indicated power availability from the charger and battery, and voltage on the bus. ITS LCO 3.8.9 requires the applicable electrical power distribution subsystems to be OPERABLE and ITS SR 3.8.9.1 requires the verification of correct breaker alignments and voltage to required AC, DC, and vital bus electrical power distribution subsystems. This changes	ITS Bases	Technical Specification Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		the CTS by moving the procedural detail that the buses must be energized with tie breakers or disconnect switches open between redundant buses from the CTS to the ITS Bases.			
3.8.9 LA02	3.8.2.1 3.8.2.3	CTS LCO 3.8.2.1 requires the AC electrical buses to be OPERABLE and lists the specific AC and 120 VAC vital buses, including the applicable nominal bus voltage. CTS LCO 3.8.2.3 requires the Trains A and B DC buses to be OPERABLE and lists the specific MCC. ITS LCO 3.8.9 requires the Train 1 and Train 2 AC, DC, and AC vital bus electrical power distribution subsystems to be OPERABLE. This changes the CTS by moving the specific names of the buses and the associated nominal bus	ITS Bases	Technical Specification Bases Control Program	1
3.8.9 LA03	4.8.2.3.1	CTS 4.8.2.3.1 requires DC bus voltage of greater than or equal to 125 volts DC. This changes the CTS by moving the required bus voltage from the CTS to the ITS Bases.	ITS Bases	Technical Specification Bases Control Program	1
3.8.10 LA01	3.8.2.2 3.8.2.4 4.8.2.4.1	CTS LCO 3.8.2.2 requires AC electrical buses to be OPERABLE and specifies nominal bus voltages. CTS LCO 3.8.2.4 requires a 250/125 VDC MCC to be OPERABLE and CTS 4.8.2.4.1 requires the MCC bus voltage to be 125 VDC. ITS LCO 3.8.10 requires necessary portions of the AC, DC, and VAC vital bus electrical power distribution subsystems to be OPERABLE to support equipment required to be OPERABLE. ITS SR 3.8.10.1 requires the verification of correct breaker alignment and voltage to each required AC, DC, and VAC vital bus electrical power distribution subsystems. This changes the CTS by moving	ITS Bases	Technical Specification Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		description of the buses (including the nominal bus voltages and the specified limit for the 125 VDC MCC) from the Specification to the Bases.			
3.8.10 LA02	3.8.2.4 4.8.2.4	CTS 3.8.2.4 requires the DC electrical equipment including the 250/125 V DC MCC to be demonstrated OPERABLE and "energized." CTS 4.8.2.4 requires the DC 250/125 VDC MCC to be demonstrated OPERABLE and "energized" by verifying correct switch/breaker alignment and indicated power availability, indicated power availability from the "charger and battery". ITS LCO 3.8.10 requires the applicable electrical power distribution subsystems to be OPERABLE and ITS SR 3.8.10.1 requires the verification of correct breaker alignments and voltage to each required AC, DC, and AC vital bus electrical power distribution subsystems. This changes the CTS by moving the procedural detail that the buses must be "energized" and "indicated power availability from the charger and battery" from the CTS to the ITS Bases.	ITS Bases	Technical Specification Bases Control Program	3
3.9.1 LA01	LCO 3.9.1	CTS 3.9.1 states that the boron concentration in MODE 6 shall be sufficient to ensure a keff of 0.95 or less, which includes a 1% $\Delta k/k$ conservative allowance for uncertainties. ITS LCO 3.9.1 states that the boron concentration shall be within the limit specified in the COLR. This changes the CTS by relocating the MODE 6 boron concentration limit, which must be confirmed on a cycle-specific basis, to the CORE OPERATING LIMITS REPORT (COLR).	COLR	10 CFR 50.59	5
3.9.1	4.9.1.2	CTS 4.9.1.2 requires that the boron concentration of the	ITS Bases	Technical	3

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
LA02		reactor pressure vessel and the refueling canal be determined "by chemical analysis" at least once per 72 hours. ITS SR 3.9.1.1 requires a similar verification, but does not specify that the boron concentration be determined "by chemical analysis." This changes the CTS by moving the details of how the boron concentration is determined to the Bases.		Specification Bases Control Program	
3.9.5 LA01	LCO 3.9.8.2	CTS 3.9.8.2 states that two "independent" DHR loops shall be OPERABLE. ITS 3.9.5 requires two DHR loops to be OPERABLE, but does not contain the detail that the loops must be independent. This changes the CTS by moving the detail that the DHR loops are independent to the Bases.	ITS Bases	Technical Specification Bases Control Program	1
4.0 LA01	5.3.2	CTS 5.3.2 contains details of the percentage of each absorber material. The ITS does not contain these details, but includes the type of absorber material. This changes the CTS by moving the detailed description of the percentage of each type of absorber material to the UFSAR.	UFSAR	10 CFR 50.59	1
4.0 LA02	5.6.1.1.a 5.6.1.1.b	CTS 5.6.1.1.a and CTS 5.6.1.1.b contain details of the uncertainty allowances value (1% $\Delta k/k$) for Keff equivalent for the new fuel storage racks. CTS 5.6.1.2.b contains details of the type of uncertainty allowances (manufacturing tolerances and calculation uncertainties) for the spent fuel pool storage racks. The ITS does not contain these details, but still states that the Keff equivalent includes uncertainties as described in Section 9.1 of the UFSAR. This changes the CTS by moving the detailed description of the Keff equivalent uncertainty	UFSAR	10 CFR 50.59	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		allowance value and type of uncertainty allowances to the UFSAR.			
4.0 LA03	5.6.1.1.b	CTS 5.6.1.1.b, in part, states that new fuel storage racks are designed and maintained with a Keff equivalent to less than or equal to 0.98 when immersed in a hydrogenous mist "of such density that provides optimum moderation (i.e., highest value of Keff)." ITS 4.3.1.2.c states that new fuel storage racks are designed and maintained with keff < 0.98 "when immersed in a hydrogenous mist." This changes the CTS by moving the statement "of such density that provides optimum moderation (i.e., highest value of Keff)" to the UFSAR.	UFSAR	10 CFR 50.59	1
4.0 LA04	5.6.1.2 5.6.1.2.b	CTS 5.6.1.2 and CTS 5.6.1.2.b state that spent fuel storage pool racks are designed and maintained with a rectangular array of stainless steel cells with walls of 0.075 inches nominal thickness spaced a nominal 9.22 inches on center in both directions, and that boral neutron absorber material is utilized between each cell for criticality considerations. ITS 4.3.1.1 and ITS 4.3.1.1.b state that the spent fuel pool storage racks are designed and maintained with a nominal 9.22 inch center to center distance between fuel assemblies. This changes the CTS by moving the details that the spent fuel storage pool racks are "high density" racks, the description of the array (type, composition, and wall size) and that neutron absorber material is used to the UFSAR.	UFSAR	10 CFR 50.59	1
5.2 LA01	6.2.2.a Table 6.2-1,	CTS 6.2.2.a and Table 6.2-1, including footnote *, provide minimum shift crew composition requirements.	TRM	10 CFR 50.59	4

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
	including footnote *	ITS 5.2.2 only includes the minimum shift crew composition requirements that are not already included in 10 CFR 50.54. This changes the CTS by moving the minimum shift crew composition requirements addressed by 10 CFR 50.54 to the Technical Requirements Manual (TRM).			
5.4 LA01	6.8.2	CTS 6.8.2 requires that each procedure of CTS 6.8.1, and changes to these documents, be reviewed and approved prior to implementation as set forth in CTS 6.5.3. ITS 5.4 does not include this requirement. This changes the CTS by moving these details of procedure and administrative policy reviews to the QAPM.	QAPM	10 CFR 50.59	4
5.5 LA01	6.8.4.b	CTS 6.8.4.b, "In-Plant Radiation Monitoring," describes a program to ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. ITS 5.5 does not include this program. This changes the CTS by moving the requirements for the In-Plant Radiation Monitoring Program to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	4
5.5 LA02	6.8.4.e	CTS 6.8.4.e, "Radiological Environmental Monitoring Program," describes a program to monitor the radiation and radionuclides in the environs of the plant. ITS 5.5 does not include this program. This changes the CTS by moving the requirements for the Radiological Environmental Monitoring Program to the Offsite Dose Calculation Manual (ODCM).	ODCM	10 CFR 50.59	4
5.5 LA03	6.15.1.a	CTS 6.15.1.a requires changes to the ODCM to be documented and records of reviews performed to be retained as required by the UFSAR Chapter 17 Quality	QAPM	10 CFR 50.59	3

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		Assurance Program. ITS 5.5.1.c.1 requires changes to the ODCM to be documented and records of reviews performed to be retained. This changes the CTS by moving the record retention requirement reference to the Quality Assurance Program Manual (QAPM).			
5.5 LA04	4.0.5	CTS 4.0.5 provides requirements for the Inservice Inspection Program. The ITS does not include Inservice Inspection Program requirements. In addition, since the Inservice Testing Program is the only requirement remaining, the reference to ASME Code Class 1, 2, and 3 "components" has been changed to "pumps and valves" for clarity. Pumps and valves are the only components related to the Inservice Testing Program (as described in CTS 4.0.5.a). This changes the CTS by moving these requirements from the Technical Specifications to the Inservice Inspection Program (IIP).	IIP	10 CFR 50.59	4
5.5 LA05	4.0.5.a	CTS 4.0.5.a specifies that the Inservice Testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with the ASME Code for Operation and Maintenance of Nuclear Power Plants (ASME OM Code) and applicable Addenda as required by 10 CFR 50, Section 50.55a. ITS 5.5.7 states that the Inservice Testing Program provides controls for inservice testing of ASME Code Class 1, 2, and 3 pumps and valves. This changes the CTS by moving these procedural details from the Technical Specifications to the Inservice Testing Program.	IST	10 CFR 50.59	3
5.5 LA06	3/4.11.1 3/4.11.2	CTS 3/4.11.1 includes the details for implementing the requirements for the liquid holdup tanks. CTS 3/4.11.2	TRM	10 CFR 50.59	3

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		includes the details for implementing the requirements for the explosive gas mixture. The details for implementing these requirements, including the specific limits for the explosive gas mixture, are not included in the ITS. The ITS only includes a requirement to maintain a program for these requirements. This changes the CTS by moving these procedural details for implementing the requirements, including the specific limits, from the Technical Specifications to the Technical Requirements Manual (TRM).			
6.0 LA01	6.5.3	CTS 6.5.3, Technical Review and Control, explains how activities that affect nuclear safety (i.e., changes to procedures, changes or modifications to plant structures, systems, and components, and proposed tests and experiments) shall be conducted. ITS Chapter 5.0 does not retain these requirements. This changes the CTS by moving the Technical Review and Control requirements to the Quality Assurance Program Manual (QAPM).	QAPM	10 CFR 50.59	4
6.0 LA02	6.10	CTS 6.10, Record Retention, requires that records of activities be retained as described in the USAR Chapter 17 Quality Assurance Program. ITS Chapter 5.0 does not retain this requirement. This changes the CTS by moving the record retention requirements to Quality Assurance Program Manual (QAPM).	QAPM	10 CFR 50.59	4

Change Types:

Type 1 – Removing Details of System Design and System Description, Including Design Limits

Type 2 – Removing Descriptions of System Operation

Type 3 – Removing Procedural Details for Meeting TS Requirements or Reporting Requirements

Type 4 – Removal of LCO, SR, or other TS requirement to the TRM, UFSAR, ODCM, QAPM, IST Program, or IIP

Type 5 – Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report