

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
1.0 L01	The current technical specification (CTS) 1.1 definition of CHANNEL FUNCTIONAL TEST requires the use of a "simulated" signal when performing the test. The ITS Section 1.1 CHANNEL FUNCTIONAL TEST definition allows the use of an "actual or simulated" signal when performing the test. This changes the CTS by allowing the use of unplanned actuations to perform the Surveillance if sufficient information is collected to satisfy the surveillance test requirements.	1.1	1.1	6
1.0 L02	CTS 1.11 defines CHANNEL FUNCTIONAL TEST for the "Bistable channels" as the injection of a simulated signal "into the channel sensor." ITS Section 1.1 defines CHANNEL FUNCTIONAL TEST as the injection of a simulated or actual signal "into the channel as close to the sensor as practicable." This changes the CTS by allowing a signal to be injected "in the channel as close to the sensor as practicable" instead of "into the channel sensor."	1.1	1.11	6
1.0 L03	The CTS 1.19 definition of DOSE EQUIVALENT I-131 requires that the DOSE EQUIVALENT I-131 be calculated using the thyroid dose conversion factors listed in Table III of Technical Information Document (TID) 14844, "Calculation of Distance Factors for Power and Test Reactor Sites." The ITS allows DOSE EQUIVALENT I-131 to be calculated using any one of three thyroid dose conversion factors: TID 14844 (1962); Table E-7 of Regulatory Guide (RG) 1.109, Rev. 1 (1977); or International Commission on Radiological Protection (ICRP) 30, Supplement to Part 1, page 192-212, Table Titled "Committed Dose Equivalent in Target Organs or Tissues per Intake of Unit Activity." This changes the CTS by allowing two methods, ICRP 30, Supplement to Part 1 or Table E-7 of RG 1.109, Rev. 1 (1977), to be used to calculate DOSE EQUIVALENT I-131.	1.1	1.19	1

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3.0 L01	<p>CTS 3.0.4 states, "Entry into an OPERATIONAL MODE or other specified applicability conditions shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION statements unless otherwise excepted." CTS 4.0.4 states, "Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the Surveillance Requirements (SRs) associated with the Limiting Condition for Operation (LCO) have been performed within the stated surveillance interval or as otherwise specified." ITS LCO 3.0.4 states "When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made: a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time; b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to this Specification are stated in the individual Specifications; or c. When an allowance is stated in the individual value, parameter, or other Specification. This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit." ITS SR 3.0.4 states, "Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other</p>	LCO 3.0.4	3.0.4	9

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	specified condition in the Applicability shall only be made in accordance with LCO 3.0.4. This changes the CTS by providing allowances for entry into a MODE or other specified condition in the Applicability when an LCO is not met.			
3.0 L02	CTS 4.0.2 states, "Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval." ITS SR 3.0.2 states "The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met. For Frequencies specified as 'once,' the above interval extension does not apply. If a CT requires periodic performance on a 'once per . . . ' basis, the above Frequency extension applies to each performance after the initial performance. Exceptions to this Specification are stated in the individual Specifications." This changes the CTS by adding, "If a CT [completion time] requires periodic performance on a 'once per . . . ' basis, the above Frequency extension applies to each performance after the initial performance." The remaining changes to CTS 4.0.2 are discussed in Description of Change (DOC) A10 and DOC M01.	SR 3.0.2	4.02	3
3.1.1 L01	CTS 3.1.1.1 Action states that when the shutdown margin (SDM) is less than the applicable limit, boration must be initiated immediately. Under the same conditions in the improved technical specification (ITS), ITS 3.1.1 Required Action A.1 states that boration must be initiated within 15 minutes. This changes the CTS by relaxing the CT from "immediately" to 15 minutes.	3.1.1 Required Action A.1	3.1.1.1 Action	3

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3.1.1 L02	CTS 3.1.1.1 Action states that when the SDM is not within the applicable limits, boration must be initiated and continued at $\geq 25$ gallons per minute (gpm) of 7875 ppm boron or its equivalent until the required SDM is restored. ITS 3.1.1 Required Action A.1 states that with SDM not within limits, initiate boration to restore SDM to within limits. This changes the CTS by eliminating the specific values of flow rate and boron concentration that must be used to restore compliance with the LCO.	3.1.1 Required Action A.1	3.1.1.1 Action	4
3.1.1 L03	CTS 4.1.1.1.1.d requires verification that SDM is within its limit, "Prior to initial operation above 5% RATED THERMAL POWER after each fuel loading, by consideration of the factors of e. below, with the regulating rod groups at the maximum insertion limit of Specification 3.1.3.6." The ITS does not contain a similar requirement. This changes the CTS by deleting the CTS SR to verify that SDM is within its limit, "Prior to initial operation above 5% RATED THERMAL POWER after each fuel loading, by consideration of the factors of e below, with the regulating rod groups at the maximum insertion limit of Specification 3.1.3.6."	None	4.1.1.1.1.d	5
3.1.2 L01	CTS 3.1.1.1 is applicable in MODES 1, 2, 3, 4, and 5. ITS 3.1.2 is applicable in MODES 1 and 2. This changes the CTS by reducing the applicable MODES in which the core reactivity balance requirement must be met.	3.1.2 Applicability	3.1.1.1 Applicability	2

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3.1.2 L02	<p>CTS 3.1.1.1 does not contain Actions to follow if the core reactivity balance Surveillance is not met. If the core reactivity balance Surveillance was not met, LCO 3.0.3 would be entered. LCO 3.0.3 requires the plant to be in MODE 3 within 7 hours, MODE 4 within 13 hours, and MODE 5 within 37 hours. ITS 3.1.2 contains ACTIONS to follow if the core reactivity balance LCO is not met. If the LCO is not met, 7 days is provided to re-evaluate the core design and safety analysis, to determine that the reactor core is acceptable for continued operation, and to establish appropriate operating restrictions and SRs. If these actions are not completed within the 7 days, the plant must be in MODE 3 within 6 hours. This changes the CTS by providing 7 days to evaluate and provide compensatory measures for not meeting the core reactivity balance requirement, and then requiring entry into MODE 3 instead of requiring an immediate shutdown and entry into MODE 5.</p>	3.1.2 ACTIONS A and B	3.1.1.1 Actions 3.0.3	4

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.2 L03	<p>CTS 4.1.1.1.2 requires the overall core reactivity balance to be compared with the predicted value once per 31 EFPD. The CTS also requires the predicted core reactivity values to be adjusted (normalized) to correspond to the actual core conditions prior to exceeding a fuel burnup of 60 EFPD after each fuel loading.</p> <p>ITS SR 3.1.2.1 also allows the measured core reactivity balance to be compared to the predicted values every 31 EFPD, but the ITS SR is only required after 60 EFPD of core burnup, consistent with the CTS. The ITS also allows the adjustment of the predicted values to the actual values prior to exceeding a fuel burnup of 60 EFPD after each fuel loading. In addition, Note 2 to SR 3.1.2.1 is included which states that the SR is not required to be performed in MODE 2. This changes the CTS by not requiring the periodic, at-power core reactivity balance comparison until core burnup reaches 60 EFPD.</p>	SR 3.1.2.1	4.1.1.1.2	7
3.1.4 L01	<p>CTS 3.1.3.1 Actions a and c.2 require satisfying the SDM requirement in accordance with Specification 3.1.1.1. Under the same conditions in the ITS, ITS 3.1.4 ACTION A and ACTION D require verification that the SDM is within limits or initiating boration to restore SDM to within limits. This changes the CTS by providing the option to initiate action to establish compliance with the SDM requirement within 1 hour instead of declaring the Required Action not met and following ITS LCO 3.0.3.</p>	3.1.4 ACTIONS A and D	3.1.3.1 Actions a and c.2	4

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.4 L02	<p>CTS 3.1.3.1 Action a specifies requirements for one or more control rods (CRs) inoperable due to being immovable as a result of excessive friction or mechanical interference or known to be untrippable. CTS 3.1.3.1 Action b specifies requirements for more than one CR inoperable or misaligned from its group average height by more than the allowed rod misalignment. CTS 3.1.3.1 Action c specifies requirements for one CR inoperable due to causes other than those addressed by Action a, above, or misaligned from its group average height by more than the allowed rod misalignment. CTS 3.1.3.1 Action c.2 requires the affected rod to also be declared inoperable. ITS 3.1.4 ACTION D specifies requirements for one or more CRs inoperable. ITS 3.1.4 ACTION A specifies requirements for one CR not within alignment limits. ITS 3.1.4 ACTION C specifies requirements for more than one CR not within alignment limits. This changes the CTS by considering CRs that are trippable but misaligned to be OPERABLE and excludes other types of CR inoperabilities not addressed in CTS 3/4.1.3.4 (e.g., drop times). The requirement to declare a misaligned rod inoperable in CTS 3.1.3.1, Action c.2, is deleted. The requirements for CR drop times are addressed in DOC M03.</p>	3.1.4 ACTIONS A, C, and D	3.1.3.1 Actions a, b, and c	4
3.1.4 L03	<p>When one CR is misaligned CTS 3.1.3.1 Action c.2.c) requires a power distribution map to be obtained from the incore detectors and <math>F_Q</math> and <math>F_{\Delta H}^N</math> verified to be within their limits within 72 hours. ITS 3.1.4 Required Action A.6 includes the same requirement however it is only required to be performed when THERMAL POWER is &gt; 20 percent rated thermal power (RTP). This changes the CTS by only requiring the Required Action to be performed when THERMAL POWER is &gt; 20 percent RTP.</p>	3.1.4 Required Action A.6	CTS 3.1.3.1 Action c.2.c)	4

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3.1.4 L04	CTS 3.1.3.1 Action c.2.d states that with one rod misaligned, reduce the THERMAL POWER level to $\leq 60$ percent of the THERMAL POWER allowable within one hour and within the next 4 hours to reduce the High Flux Trip Setpoint to $\leq 70$ percent of the THERMAL POWER allowable for the reactor coolant pump combination. ITS 3.1.4 ACTION A requires THERMAL POWER to be reduced to $\leq 60$ percent of ALLOWABLE THERMAL POWER within 2 hours and to reduce the High Flux trip setpoint to $\leq 70$ percent of the ALLOWABLE THERMAL POWER within 10 hours. This changes the CTS by changing the CTs to reduce THERMAL POWER and the high flux trip setpoint from 1 hour to 2 hours and from 5 hours (1 hour plus 4 hours) to 10 hours, respectively.	3.1.4 ACTION A	3.1.3.1 Action c.2.d	3
3.1.4 L05	CTS 4.1.3.1.1 requires the position of each CR to be determined to be within the group demand limit by verifying the individual rod positions at least once per 12 hours except during time intervals when the asymmetric rod monitor is inoperable. In this situation the position of each CR is monitored at least once per 4 hours. ITS SR 3.1.4.1 requires verification that the individual CR positions are within the alignment limits every 12 hours. This changes the CTS by eliminating the requirement to verify the individual CR positions to be within alignment limits every 4 hours when the asymmetric rod monitor is inoperable.	SR 3.1.4.1	4.1.3.1.1	7
3.1.4 L06	CTS 4.1.3.4.b requires the rod drop time of CRs to be demonstrated through measurement prior to reactor criticality for specifically affected individual rods following any maintenance on or modification to the CRD system which could affect the drop time of those specific rods. The ITS does not include this testing requirement.	None	4.1.3.4.b	5



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3.1.4 L07	CTS 4.1.3.4 requires the rod drop time of safety and regulating rods to be demonstrated through measurement prior to reactor criticality following each removal of the reactor vessel head and at least once per REFUELING INTERVAL (24 months). ITS SR 3.1.4.3 requires the test to be performed prior to criticality after each removal of the reactor head. This changes the CTS by deleting the SR.	SR 3.1.4.3	4.1.3.4	5
3.1.4 L08	CTS 4.1.1.1.1.a requires verification of SDM within one hour after detection of inoperable CR(s) and at least once per 12 hours thereafter while the rod(s) are inoperable. These requirements are applicable in MODES 1, 2, 3, 4, and 5. ITS 3.1.4 Required Action D.1.1 requires the verification of SDM to be within limits within 1 hour. These verifications are required in MODES 1 and 2 with one or more CR(s) inoperable. This changes the CTS by not requiring any explicit SDM verifications for inoperable CR(s) in MODES 3, 4, and 5 other than the normal verifications specified in ITS SR 3.1.1.1 (once every 24 hours). For MODE 1 and 2 operations, this changes the CTS by not requiring the verification of SDM on a once per 12 hour basis for one or more inoperable rod(s).	3.1.4 Required Action D.1.1	4.1.1.1.1.a	5

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.4 L09	CTS 3.1.3.4 Action a requires that with the drop time of any CR determined to exceed the limits of the LCO, to restore the rod drop time to within the above limit prior to proceeding to MODE 1 or 2. ITS 3.1.4 does not have a similar requirement, however ITS LCO 3.0.4 states "When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made after performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to this Specification are stated in the individual Specifications." This changes the CTS by providing an allowance for entry into a MODE or other specified condition in the Applicability when the drop time of any CR is not met.	3.0.4	3.1.3.4 Action a	4
3.1.5 L01	CTS 4.1.3.5.a requires verification that each safety rod be fully withdrawn within 15 minutes prior to withdrawal of any regulating rod during an approach to reactor criticality. ITS 3.1.5 does not require verification that each safety rod be fully withdrawn within 15 minutes prior to withdrawal of any regulating rod during an approach to reactor criticality. This changes the CTS by eliminating the requirement that each safety rod be fully withdrawn within 15 minutes prior to withdrawal of any regulating rod during an approach to reactor criticality.	None	4.1.3.5.a	5

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3.1.6 L01	When there is a maximum of one axial power shaping rod (APSR) inoperable or misaligned from its group average, CTS 3.1.3.2 Action b requires the imbalance limits of Specification 3.2.1 to be verified to be within limit in 2 hours. However, the Action does not allow movement of the APSR group while the rod remains inoperable or misaligned. ITS 3.1.6 ACTION A requires the performance of SR 3.2.3.1, the AXIAL POWER IMBALANCE operating limit verification, within 2 hours and within 2 hours after each APSR movement. This changes the CTS by allowing the movement of the APSRs however adds a requirement to verify the AXIAL POWER IMBALANCE is within limit within 2 hours after each APSR movement.	3.1.6 ACTION A	3.1.3.2 Action b	4
3.1.6 L02	CTS 4.1.3.2.1 requires the position of each APSR to be determined to be within group average height limits at least once every 12 hours except during time intervals when the asymmetric rod monitor is inoperable. When the asymmetric rod monitor is inoperable, CTS 4.1.3.2.1 requires verification of the individual rod position(s) of the rod(s), with the inoperable asymmetric rod monitor at least once per 4 hours. ITS SR 3.1.6.1 requires verification of the position of each APSR is within limit every 12 hours. This changes the CTS by eliminating the requirement to verify the individual rod position(s) of the rod(s), with the inoperable asymmetric rod monitor at least once per 4 hours.	SR 3.1.6.1	4.1.3.2.1	7

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.7 L01	<p>CTS 3.1.3.3 Action a covers the inoperabilities for a maximum of one absolute position indicator channel per CR group or one relative position indicator channel per CR group. CTS 3.1.3.3 Action b covers the inoperabilities for more than one relative position indicator channel per CR group. ITS 3.1.7 ACTIONS are modified by a Note that states "Separate Condition entry is allowed for each inoperable position indicator channel." ITS ACTION A covers inoperabilities for the relative position indicator channels for one or more rods and ITS ACTION B covers inoperabilities for the absolute position indicator channels for one or more rods. ITS ACTION C covers the inoperabilities for absolute position indicator channel and relative position indicator channels for one or more rods. This changes the CTS by allowing separate Condition entry for each inoperable absolute position indicator channel and relative position indicator.</p>	3.1.7 ACTIONS A, B, and C	3.1.3.3 Actions a and b	4

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3.1.7 L02	<p>CTS 3.1.3.3 Action a, in part, covers the inoperabilities for a maximum of one relative position indicator channel per CR group. CTS 3.1.3.3 Action a.2 provides an action that allows operation to continue provided the position of the CR with the inoperable position indicator is verified within 8 hours by actuating one of the position reference indicators, the CR group(s) containing the inoperable position indicator channel is verified to be maintained at the position reference indicators at least once per 12 hours, and operation is within the limits provided in Specification 3.1.3.5 (Safety Rod Insertion Limit), Specification 3.1.3.6 (Regulating Rod Insertion Limits), and Specification 3.1.3.9 (APSR Insertion Limits). CTS 3.1.3.3 Action b covers the inoperabilities for more than one relative position indicator channel per CR group and requires the application of CTS 3.1.3.3 Action a.1 or a.2 and verification that the absolute position indicators channels for the affected CR assemblies are OPERABLE. ITS 3.1.7 ACTION A covers inoperabilities for the relative position indicator channels for one or more rods and it requires the determination that the absolute position indicator channel for the rod(s) is OPERABLE. This changes the CTS by replacing the CTS 3.1.3.3 Action a.2 requirements for the inoperable relative position indicator channels and replacing it with a Required Action to determine the absolute position indicator channel for the rod(s) is OPERABLE consistent with the requirements in CTS 3.1.3.3 Action b.</p>	3.1.7 ACTION A	3.1.3.3 Action a.2	4

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3.1.7 L03	ITS 3.1.7 ACTION B covers inoperabilities associated with the absolute position indicator channel for one or more rods. ITS 3.1.7 Required Action B.2.1 requires the control groups with nonindicating rods to be placed under manual control within 8 hours and ITS 3.1.7 Required Action B.2.2 requires the determination of the position of the nonindicating rods indirectly with fixed incore instrumentation within 8 hours, once per 8 hours thereafter, and 1 hour after motion of nonindicating rods which exceeds 11 percent in one direction since the last determination of the rod's position (Not applicable during the first 8 hour period). This changes the CTS by providing alternative Required Actions when an absolute position indicator channel is inoperable for one or more rods.	3.1.7 Required Actions B.2.1 and B.2.2	None	4
3.1.7 L04	CTS 3.1.3.3 does not contain an Action to follow if the provided Actions cannot be met and does not provide an Action to follow with both absolute and relative position indicator channels inoperable for one or more rods. Therefore, CTS 3.0.3 would be entered, which would allow 1 hour to initiate a shutdown and to be in HOT STANDBY within 7 hours. ITS 3.1.7 contains ACTION C that requires the plant to immediately declare the rod(s) inoperable. For APSRs this will require entry into ITS 3.1.6 ACTION A and the plant is required to perform SR 3.2.3.1 (the verification of AXIAL POWER IMBALANCE) within 2 hours and 2 hours after each APSR movement. This changes the CTS by eliminating the requirement to enter CTS 3.0.3 and commence a plant shutdown.	3.1.7 ACTION C	3.1.3.3 Actions 3.0.3	4

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3.1.7 L05	CTS 4.1.3.3 requires each absolute and relative position indicator channel to be determined to be OPERABLE by verifying that the relative position indicator channels and the absolute position indicator channels agree at least once per 12 hours. However, if the asymmetric rod monitor is inoperable, then a comparison of the relative position indicator and absolute position indicator channel(s) of the rod(s) with the inoperable asymmetric rod monitor must be performed at least once per 4 hours. 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 every 12 hours. This changes the CTS by eliminating the requirement to verify the individual CR positions to be within limit every 4 hours when the asymmetric rod monitor is inoperable.	SR 3.1.7.1	4.1.3.3	7
3.1.8 L01	CTS 3.10.1 requires the limits of Specification 3.2.2 ( $F_Q$ ) and Specification 3.2.3 ( $F_{\Delta H}^N$ ) to be maintained at all times during the PHYSICS TESTS in MODE 1. ITS 3.10.1.d only requires $F_Q$ and $F_{\Delta H}^N$ to maintained at THERMAL POWER > 20 percent RTP. This changes the CTS by reducing the applicable conditions in which the Nuclear Heat Flux Hot Channel Factor ( $F_Q$ ) and Nuclear Enthalpy Rise Hot Channel Factor ( $F_{\Delta H}^N$ ) requirements must be met.	3.10.1.d	3.10.1	2
3.1.8 L02	When SDM is not within limit, the CTS 3.1.1.1 Action requires the plant to immediately initiate and continue boration at $\geq 25$ gpm, of 7875 ppm boron or its equivalent, until the required SDM is restored. ITS 3.1.8 Required Action A.1 requires the boration to proceed within 15 minutes to reduce SDM to within limit. This changes the CTS by relaxing the CT from "immediately" to 15 minutes.	3.1.8 Required Action A.1	3.1.1.1 Action	3

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3.1.8 L03	CTS 3.1.1.1 Action states that when the SDM is not within the applicable limits, boration must be initiated and continued at $\geq 25$ gpm of 7875 ppm boron or equivalent until the required SDM is restored. ITS 3.1.8 ACTION A states that with the SDM not within limits, initiate boration to restore SDM to within limits. This changes the CTS by eliminating the specific values of flow rate and boron concentration that must be used to restore compliance with the LCO.	3.1.8 ACTION A	3.1.1.1 Action	4
3.1.9 L01	When SDM is not within limit, CTS 3.1.1.1 Action requires the plant to immediately initiate and continue boration at $\geq 25$ gpm, of 7875 ppm boron or its equivalent, until the required SDM is restored. ITS 3.1.9 Required Action B.1 requires the boration to proceed within 15 minutes to reduce SDM to within limit. This changes the CTS by relaxing the CT from "immediately" to 15 minutes.	3.1.9 Required Action B.1	3.1.1.1 Action	3
3.1.9 L02	CTS 3.1.1.1 Action states that when the SDM is not within the applicable limits, boration must be initiated and continued at $\geq 25$ gpm of 7875 ppm boron or equivalent until the required SDM is restored. ITS 3.1.9 ACTION B states that with the SDM not within limits, initiate boration to restore SDM to within limits. This changes the CTS by eliminating the specific values of flow rate and boron concentration that must be used to restore compliance with the LCO.	3.1.9 ACTION B	3.1.1.1 Action	4



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3.1.9 L03	<p>CTS 3.10.2 state that limitations of certain Specifications may be suspended during the performance of PHYSICS TESTS. ITS 3.1.9 provides an additional exception to LCO 3.4.2, "RCS [reactor coolant system] Minimum Temperature for Criticality," provided the RCS lowest loop average temperature is <math>\geq 520^{\circ}\text{F}</math> (ITS LCO 3.1.9 part e). A Surveillance to verify the RCS lowest loop average temperature is <math>\geq 520^{\circ}\text{F}</math> every 30 minutes (ITS SR 3.1.9.2) has been added. In addition, ITS 3.1.9 ACTION C has been added to cover the situation when RCS lowest loop average temperature is not within limit. The Required Action is to suspend PHYSICS TESTS exceptions within 30 minutes. This changes the CTS by allowing the suspension of the RCS minimum temperature for criticality limit during performance of a MODE 2 PHYSICS TEST. However, it places a limitation on the RCS lowest loop average temperature that is allowed during the test.</p>	LCO 3.1.9 part e 3.1.9 ACTION C SR 3.1.9.2	3.10.2	1
3/4.1.1.2 L01	<p>CTS 3.1.1.2 requires the flow rate of reactor coolant (RC) through the RCS to be greater than or equal to 2800 gpm whenever a reduction in RCS boron concentration is being made. With the flow rate not within limit, immediate suspension of all operations involving a reduction in boron concentration of the RCS is required. CTS 4.1.1.2 requires the flow rate of RC through the RCS to be monitored within one hour prior to the start and at least once per hour during a reduction in the RCS boron concentration. The ITS does not include this Specification. This changes the CTS by eliminating this Specification.</p>	None	3/4.1.1.2	1

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3/4.1.3.8 L01	CTS 3.1.3.8 does not allow THERMAL POWER to be increased above the power level cutoff specified in the acceptable operating limits for regulating rod position provided in the COLR unless xenon reactivity is within 10 percent of the equilibrium value for RTP and is approaching stability or THERMAL POWER has been within a range of 87 to 92 percent RTP for a period exceeding 2 hours in the soluble poison control mode, excluding xenon free start-ups. The ITS does not include this Specification. This changes the CTS by eliminating this Specification.	None	3/4.1.3.8	1
3.2.1 L01	The CTS 3.1.3.6 Action requires entry with the regulating rod groups inserted beyond the operating limits (in a region other than acceptable operation) or with any group sequence or overlap outside the limits. CTS 3.1.3.6 provides three optional Required Actions. CTS 3.1.3.6 Action a requires restoration of the regulating groups to within the limits within 2 hours. CTS 3.1.3.6 Action b requires the reduction in THERMAL POWER to less than or equal to that fraction of RTP which is allowed by the rod group position limits. CTS 3.1.3.6 Action c requires the plant to be in Hot Standby (MODE 3) within 6 hours. ITS 3.2.1 ACTION A requires entry when regulating rod groups are inserted in the restricted operational region. ITS 3.2.1 ACTION C requires entry when regulating rod groups sequence or overlap limits are not met. ITS 3.2.1 ACTION D requires entry when regulating rod groups are inserted in the unacceptable operational region. ITS 3.2.1 ACTION A requires the performance of ITS SR 3.2.5.1 once per 2 hours when THERMAL POWER is > 20 percent RTP and the restoration of regulating rod groups to within limits within 24 hours from discovery of failure to meet the LCO. ITS 3.2.1 ACTION B covers the conditions when the Required Actions and associated CTs of Condition A are not met	3.2.1 ACTIONS A, C, and D	3.1.3.6 Actions a, b, and c	3

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	<p>when the plant is operating in the restricted operational region and it allows 2 hours to reduce THERMAL POWER to less than or equal to THERMAL POWER allowed by regulating rod group insertion limits. ITS 3.2.1 ACTION C requires performance of ITS SR 3.2.5.1 within 2 hours when THERMAL POWER is &gt; 20 percent RTP and the restoration of regulating rod groups to within limits within 4 hours. ITS 3.2.1 ACTION D, in part, requires the restoration of the rod groups to within restricted operating region within 2 hours or a reduction of THERMAL POWER to less than or equal to the THERMAL POWER allowed by the regulating rod group insertion limits. This changes the CTS by extending the CT to restore regulating rod groups to within limits from 2 hours to 24 hours when regulating rod groups are inserted in restricted operational region, and from 2 hours to 4 hours when regulating rod groups are not within the sequence or overlap limits. However it provides an additional requirement to verify <math>F_Q</math> and <math>F_{\Delta H}^N</math> are within their limits once per 2 hours (for ITS 3.2.1 ACTION A) or within 2 hours (for ITS 3.2.1 ACTION C) during the extended CTs. This change also provides an additional allowance to operate in the restricted operational region for an additional 2 hours (after the 24 hours period) to reduce THERMAL POWER to less than or equal to THERMAL POWER allowed by regulating rod group insertion limits.</p>			

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2.1 L02	CTS 4.1.3.6 requires the position of each regulating group to be determined to be within the limits provided in the COLR at least once every 12 hours except during time intervals when the regulating rod insertion limit alarm or the CRD sequence alarm is inoperable. With either of these alarms inoperable, CTS 4.1.3.6.a requires a verification that the rod groups are within the insertion limits at least once per 4 hours and CTS 4.1.3.6.b requires a verification that the rod groups are within the sequence or overlap limits at least once per 4 hours, respectively. ITS SR 3.2.1.1 requires verification that regulating rod groups are within the sequence and overlap limits of the COLR every 12 hours, and ITS SR 3.2.1.2 requires verification that the regulating rod groups meet the insertion limits specified in the COLR every 12 hours. This changes the CTS by eliminating the requirement to verify that each regulating group is within insertion limits at accelerated frequencies when the regulating rod insertion limit alarm or the CRD sequence alarm is inoperable	SR 3.2.1.1 SR 3.2.1.2	4.1.3.6.a and b	7
3.2.1 L03	CTS 3.1.3.6 Action Note requires entry into the Actions of CTS 3.1.1.1 if the plant is in the unacceptable region specified in the COLR. The CTS 3.1.1.1 Action states that when the SDM is less than the applicable limit, boration must be initiated immediately. Under the same conditions in the ITS, ITS 3.2.1 Required Action D.1 states that boration must be initiated within 15 minutes. This changes the CTS by relaxing the CT from "immediately" to 15 minutes.	3.2.1 Required Action D.1	3.1.3.6 Action Note 3.1.1.1 Action	3

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2.1 L04	CTS 3.1.1.1 Action states that when the SDM is not within the applicable limits, boration must be initiated and continued at $\geq 25$ gpm of a solution containing $\geq 7875$ ppm boron or its equivalent until the required SDM is restored. ITS 3.2.1 Required Action D.1 states that with the regulating rod groups inserted in the unacceptable operational region to initiate boration to restore SDM to within limits. This changes the CTS by eliminating the specific values of flow rate and boron concentration that must be used to restore compliance with the LCO.	3.2.1 Required Action D.1	3.1.1.1 Action	4
3.2.1 L05	CTS 4.1.1.1.1.c require verification of SDM, when in MODE 2 with $keff < 1.0$ , within 4 hours prior to achieving reactor criticality. ITS SR 3.2.1.3 requires SDM to be verified within limit within 4 hours prior to achieving criticality. This changes the CTS by eliminating the explicit statement that the Surveillance is required to be performed in MODE 2.	SR 3.2.1.3	4.1.1.1.1.c	7
3.2.2 L01	In the event the APSRs are outside the operating limits specified in the COLR, CTS 3.1.3.9 Action a requires the APSRs to be restored to within the limits within 2 hours, as one of three alternative actions. ITS 3.2.2 ACTION A provides a 24 hour CT to restore the APSRs to within limits and requires the performance of SR 3.2.5.1 (Verify $F_Q$ and $F_{\Delta H}^N$ are within limits by using the Incore Detector System to obtain a power distribution map) when THERMAL POWER is $> 20$ percent RTP once per 2 hours. This changes the CTS by extending the CT from “2 hours” to “24 hours” and provides a requirement to verify $F_Q$ and $F_{\Delta H}^N$ are within their limits once per 2 hours.	3.2.2 ACTION A	3.1.3.9 Action a	3

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2.2 L02	CTS 4.1.3.9 requires the position of the APSR group to be determined to be within the limits provided in the core operating limits report (COLR) at least once every 12 hours except during time intervals when the APSR insertion limit alarm is inoperable. With this alarm inoperable, CTS 4.1.3.9 requires the verification that the group is within the limit provided in the COLR at least once per 4 hours. ITS SR 3.2.2.1 requires verification that APSRs are within the acceptable limits specified in the COLR every 12 hours. This changes the CTS by eliminating the requirement to verify that the APSR group is within the limits provided in the COLR at least once per 4 hours when the APSR insertion limit alarm is inoperable	SR 3.2.2.1	4.1.3.9	7
3.2.3 L01	CTS 3.2.1 Action a requires the restoration of AXIAL POWER IMBALANCE to be within limits within 15 minutes. ITS 3.2.3 ACTION A requires the performance of ITS SR 3.2.5.1 (Verify $F_Q$ and $F_{\Delta H}^N$ are within limits by using the Incore Detector System to obtain a power distribution map) once per 2 hours and the restoration of the AXIAL POWER IMBALANCE to within limits within 24 hours. This changes the CTS by extending the CT from “15 minutes” to “24 hours” and provides a requirement to verify $F_Q$ and $F_{\Delta H}^N$ are within their limits once per 2 hours	3.2.3 ACTION A	3.2.1 Action a	3

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2.3 L02	In the event the AXIAL POWER IMBALANCE exceeds the limits, CTS 3.2.1 Action b requires power to be reduced until the imbalance limits are met or to be $\leq 40$ percent RTP within one hour, as one of two alternative actions. ITS 3.2.3, Required Action B.1 requires THERMAL POWER to be reduced to $\leq 40$ percent RTP within 2 hours if the Required Actions and CTs of Condition A (AXIAL POWER IMBALANCE not within limits) are not met. This change revises the CTS Action by extending the total time allowed to reduce THERMAL POWER to $\leq 40$ percent RTP from 1 hour to 26 hours (the Required Actions of ITS 3.2.3 Condition A provides a 24 hour CTs prior to Condition B being entered). The justification for the CT of 24 hours is discussed in DOC L01.	3.2.3 Required Action B.1	3.2.1 Action b	3
3.2.3 L03	CTS 4.2.1 requires the AXIAL POWER IMBALANCE to be determined to be within operating limits at least once every 12 hours except during time intervals when the AXIAL POWER IMBALANCE alarm is inoperable. With this alarm inoperable, CTS 4.2.1 requires the verification that AXIAL POWER IMBALANCE is within limits at least once per hour. ITS SR 3.2.3.1 requires verification that AXIAL POWER IMBALANCE is within limits every 12 hours. This changes the CTS by eliminating the requirement to verify that AXIAL POWER IMBALANCE is within the limits at least once per hour when the AXIAL POWER IMBALANCE alarm is inoperable.	SR 3.2.3.1	4.2.1	7

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2.4 L01	<p>CTS 3.2.4 is applicable in MODE 1 above 15 percent RTP. In addition, due to this Applicability, when the quadrant power tilt (QPT) is exceeding the Maximum Limit in the COLR, CTS 3.2.4 Action d requires a power reduction to <math>\leq 15</math> percent RTP. Furthermore, CTS 4.2.4, the QPT Surveillance, is required when above 15 percent RTP. ITS 3.2.4 is applicable in MODE 1 when <math>&gt; 20</math> percent RTP. Under similar conditions as in the CTS, ITS 3.2.4 ACTION D requires a reduction in power to <math>\leq 20</math> percent RTP. Furthermore, ITS SR 3.2.4.1 is applicable when <math>&gt; 20</math> percent RTP. This changes the CTS by changing the Applicability of the QPT requirement from <math>&gt; 15</math> percent RTP to <math>&gt; 20</math> percent RTP.</p>	LCO 3.2.4 Applicability 3.2.4 ACTION D	3.2.4 Applicability 3.2.4 Action d 4.2.4	2



Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2.4 L02	<p>CTS 3.2.4 Action a.1.b, which applies when QPT is determined to exceed the Steady State Limit but less than or equal to the Transient Limit, requires a reduction of THERMAL POWER within 2 hours and also requires a reduction of the High Flux trip setpoint and the Flux-ΔFlux-Flow trip setpoint at least 2 percent for each 1percent of QPT in excess of the Steady State Limit within 4 hours. CTS 3.2.4 Action a.2 requires QPT to be within it Steady State limit within 24 hours. Under the same conditions in the ITS, ITS 3.2.4 ACTION A requires the reduction in THERMAL POWER and the trip setpoints but the CT for reducing the trip setpoints has been extended to 10 hours or provides the option to perform ITS SR</p> <p>3.2.5.1 (Verify <math>F_Q</math> and <math>F_{\Delta H}^N</math> are within limits by using the Incore Detector System to obtain a power distribution map) once per 2 hours, and requires restoration of QPT to within limits within 24 hours. This changes the CTS by extending the CT to reduce the trip setpoints from "4 hours" to "10 hours" and providing an option to verify <math>F_Q</math> and <math>F_{\Delta H}^N</math> are within their limits once per 2 hours for the first 24 hours instead of reducing THERMAL POWER and the trip setpoints</p>	3.2.4 ACTION A	3.2.4 Action a.1.b	3

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2.4 L03	<p>CTS 3.2.4 Action a.1 and a.2 provide Actions for when QPT is determined to exceed the Steady State Limit but less than or equal to the Transient Limit. CTS 3.2.4 Action b.1 and b.2 provide Actions for when QPT is determined to exceed the Transient Limit but less than or equal to the Maximum Limit. CTS 3.2.4 Action b.1 and b.2 provide Actions for when QPT is determined to exceed the Transient Limit but less than or equal to the Maximum Limit due to misalignment of either a safety, regulating or APSR. When these Actions are not met CTS 3.2.4 Action a.2 and CTS 3.2.4 Action b.2 both require a reduction to less than 60 percent of the ALLOWABLE THERMAL POWER within 2 hours and a reduction in the High Flux trip setpoint to <math>\leq 65.5</math> percent within 4 hours. CTS 3.2.4 Action c.1 provide Actions for when QPT is determined to exceed the Transient Limit but less than the Maximum Limit due to causes other than the misalignment of either a safety, regulating or APSR. Under the same conditions, ITS 3.2.4 ACTION C specifies the same requirements however the CT to reduce the High Flux trip setpoint has been extended to 10 hours. This changes the CTS by extending the CT from “4 hours” to “10 hours.”</p>	3.2.4 ACTION C	3.2.4 Actions a.2 and b.2	3
3.2.4 L04	<p>CTS 4.2.4 requires the QPT to be verified to be within limit every 7 days when the QPT alarm is OPERABLE and requires the verification every 12 hours when the QPT alarm is inoperable. ITS SR 3.2.4.1 requires verification that QPT is within limit every 7 days. This changes the CTS by eliminating the requirement to verify QPT more frequently when the QPT alarm is inoperable.</p>	SR 3.2.4.1	4.2.4	7

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2.5 L01	CTS 3.2.2 and CTS 3.2.3 are both applicable in MODE 1. ITS 3.2.5 is applicable in MODE 1 with THERMAL POWER > 20 percent RTP. This changes the CTS by reducing the applicable MODES in which the Nuclear Heat Flux Hot Channel Factor ( $F_Q$ ) and Nuclear Enthalpy Rise Hot Channel Factor ( $F_{\Delta H}^N$ ) requirements must be met.	3.2.5 Applicability	3.2.2 Applicability 3.2.3 Applicability	2
3.2.5 L02	CTS 3.2.2 Action a states the High Flux and Flux- $\Delta$ Flux-Flow trip setpoints must be reduced 1 percent for each 1percent $F_Q$ exceeds its limit within 4 hours. The CTS 3.2.3 Action a states the High Flux and Flux- $\Delta$ Flux-Flow trip setpoints must be reduced 1 percent for each 1 percent $F_{\Delta H}^N$ exceeds its limit within 4 hours. ITS 3.2.5 Required Actions A.2 and B.2 requires the trip setpoints to be reduced similarly within 10 hours. This changes the CTS by extending the CT from 4 hours to 10 hours.	3.2.5 Required Actions A.2 and B.2	3.2.2 Action a 3.2.3 Action a	3
3.2.5 L03	CTS 3.2.2 Action c and CTS 3.2.3 Action c require that, in the event $F_Q$ and $F_{\Delta H}^N$ (the power peaking factors), respectively, are not within limits, the cause of the out of limit condition be identified and corrected prior to increasing THERMAL POWER above the reduced limit required by Actions a or b. In addition, these Actions state that subsequent POWER OPERATION may proceed provided that $F_Q$ and $F_{\Delta H}^N$ , respectively, are demonstrated through in-core mapping to be within their limits at a nominal 50 percent of RTP prior to exceeding this THERMAL POWER, at a nominal 75 percent of RTP prior to exceeding this THERMAL POWER and within 24 hours after attaining 95 percent or greater RTP. ITS 3.2.5 does not contain these actions. This changes the CTS by deleting the requirement to confirm the peaking factors are within limit at 50 percent RTP, 75 percent RTP, and 95 percent RTP.	None	3.2.2 Action c 3.2.3 Action c	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2.5 L04	<p>CTS 4.2.2.1 and CTS 4.2.3.1 require, in part, that <math>F_Q</math> and <math>F_{\Delta H}^N</math>, respectively, are determined to be within limits by using the incore detectors to obtain a power distribution map. The Frequencies of the SRs are prior to operation above 75 percent RTP after each fuel loading, at least once per 31 Effective Full Power Days. The Surveillance Frequency also states that the provisions of Specification 4.0.4 are not applicable. ITS SR 3.2.5.1 requires that <math>F_Q</math> and <math>F_{\Delta H}^N</math>, be verified to be within limits by using the Incore Detector System to obtain a power distribution map as specified by the applicable LCO(s). ITS SR 3.2.5.1 is modified by a note that states that the verification is only required to be performed when specified in LCO 3.1.8, "PHYSICS TESTS Exceptions - MODE 1," or when complying with Required Actions of LCO 3.1.4, "CONTROL ROD Group Alignment Limits," LCO 3.2.1, "Regulating Rod Insertion Limits," LCO 3.2.2, "AXIAL POWER SHAPING ROD (APSR) Insertion Limits," LCO 3.2.3, "AXIAL POWER IMBALANCE Operating Limits," and LCO 3.2.4, "QUADRANT POWER TILT." This changes the CTS by deleting the requirement to perform the power peaking factor determinations at the specified Frequencies.</p>	SR 3.2.5.1	4.2.2.1 4.2.3.1	7
3.3.1 L01	<p>CTS 4.3.1.1.2 requires the shutdown bypass function to be demonstrated OPERABLE at least once per REFUELING INTERVAL during CHANNEL CALIBRATION testing of each channel affected by shutdown bypass operation. ITS 3.3.1 does not include this specific SR. This changes the CTS by deleting the Surveillance.</p>	None	4.3.1.1.2	5

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.1 L02	CTS Table 3.3-1 Functional Unit 2 (High Flux) or Functional Unit 4 (Flux - $\Delta$ Flux - Flow) requires entry into CTS Table 3.3-1 Action 2. Action 2 part b requires either THERMAL POWER to be restricted to $\leq 75$ percent RTP and the High Flux trip setpoint be reduced to $\leq 85$ percent RTP within 4 hours or the QPT must be monitored at least once per 12 hours. ITS 3.3.1 does not include this Required Action. This changes the CTS by deleting this Required Action.	None	Table 3.3-1 Action 2	4
3.3.1 L03	CTS Table 3.3-1 Functional Unit 14 (Shutdown Bypass High Pressure) requires entry into ACTION 6. ACTION 6 states, "With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement, verify compliance with the SDM requirements of Specification 3.1.1.1 within one hour and at least once per 12 hours thereafter. Under the same conditions in the ITS (i.e., with two channels inoperable), ITS 3.3.1 ACTION B requires one channel to be placed in the trip condition and the second channel to be placed in bypass within one hour. ITS 3.3.1 does not include the CTS Table 3.3-1 ACTION 6. This changes the CTS by replacing the CTS action with ITS 3.3.1 ACTION B.	3.3.1 ACTION B	Table 3.3-1 Functional Unit 14 ACTION 6	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.1 L04	When two channels are inoperable CTS Table 3.3-1 Functional Units 2 through 9 require entry into CTS Table 3.3-1 Action 10. Action 10 requires one inoperable channel to be placed in trip and the second inoperable channel to be placed in bypass within one hour. In addition, it requires the restoration of one of the inoperable channels to OPERABLE status within 48 hours. ITS 3.3.1 ACTION B only requires the one channel to be placed in trip and the other channel to be placed in bypass within one hour. ITS 3.3.1 does not include the Required Action to restore the channels to OPERABLE status within any specific time frame. This changes the CTS by deleting the Required Action to restore the channels to OPERABLE status within any specific time frame.	3.3.1 ACTION B	Table 3.3-1 Functional Units 2 through 9 Action 10	4
3.3.1 L05	CTS Table 3.3-1 requires Functional Unit 6 (RC High Pressure) to be OPERABLE in MODES 1 and 2. ITS Table 3.3.1-1 Function 3, in part, requires the RC High Pressure Function to be OPERABLE in MODE 1 and MODE 2 when not in shutdown bypass (ITS Table 3.3.1-1 Footnote a). This changes the CTS by deleting the requirements for OPERABILITY of the RC High Pressure functional unit in MODE 2 when in shutdown bypass operation.	Table 3.3.1-1 Function 3	Table 3.3-1 Functional Unit 6	2

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.3 L01	<p>CTS Table 3.3-1 Action 7b states that "one additional channel may be bypassed for up to 2 hours for surveillance testing per specification 4.3.1.1.1, and the inoperable channel may be bypassed for up to 30 minutes in any 24 hour period when necessary to test the trip breaker with the logic of the channel being tested per Specification 4.3.1.1.1. The inoperable channel above may not be bypassed to test the logic of a channel of the trip system associated with the inoperable channel." The ITS does not retain this specific allowance, but allows the guidance provided in LCO 3.0.5 to control the amount of time an inoperable reactor trip module (RTM) can be bypassed in lieu of complying with the Required Actions. This changes the CTS by removing the specific time limits an inoperable RTM can be bypassed for testing.</p>	None	Table 3.3-1 Action 7b	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.4 L01	<p>CTS Table 3.3-1 Functional Unit 12 requires entry into ACTION 7 when one CRD trip breaker is inoperable and requires the CRD trip breaker to be placed in the trip condition within 1 hour or to remove power supplied to the CRD trip device associated with the inoperative channel. CTS Table 3.3-1 Functional Unit 12 requires entry into ACTION 8 when one of the CRD trip breaker diverse trip features (undervoltage or shunt trip devices) is inoperable and requires the restoration of the device within 48 hours or to place the breaker in the tripped condition within 1 hour. With more than one CRD trip breaker inoperable or with more than one CRD trip breaker with a diverse trip feature inoperable, entry into LCO 3.0.3 is required and the plant must initiate action within one hour to be in MODE 3 within the next 6 hours. ITS 3.3.4 ACTIONS are modified by a Note that states "Separate Condition entry is allowed for each CRD trip device." ITS 3.3.4 ACTION A covers inoperabilities for one or more CRD trip breaker(s) undervoltage or shunt trip Functions. ITS 3.3.4 ACTION B covers inoperabilities for one or more CRD trip breaker(s) for reasons other than those in Condition A. This changes the CTS by allowing separate Condition entry for each CRD trip device thus eliminating the requirement to enter LCO 3.0.3 if more than one CRD trip breaker is inoperable. The addition of the default conditions (ITS 3.3.4 ACTIONS C and D) is discussed in DOC M01.</p>	3.3.4 ACTIONS A and B	Table 3.3-1 Actions 7 and 8	4



Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.4 L02	CTS Table 3.3-1 Action 7b states that "one additional channel may be bypassed for up to 2 hours for surveillance testing per specification 4.3.1.1.1, and the inoperable channel may be bypassed for up to 30 minutes in any 24 hour period when necessary to test the trip breaker with the logic of the channel being tested per Specification 4.3.1.1.1. The inoperable channel above may not be bypassed to test the logic of a channel of the trip system associated with the inoperable channel." The ITS does not retain this specific allowance, but allows the guidance provided in LCO 3.0.5 to control the amount of time an inoperable CRD trip breaker can be bypassed in lieu of complying with the Required Actions. This changes the CTS by removing the specific time limits an inoperable CRD trip breaker can be bypassed for testing.	None	Table 3.3-1 Action 7b	4
3.3.4 L03	CTS Table 3.3-1 ACTION 8 requires the CRD trip breaker to be placed in the tripped condition. ITS 3.3.4 ACTION A includes this same Required Action but provides an option to remove power from the associated CRD trip breaker. This changes the CTS by providing an option to remove power from the associated CRD trip breaker instead of tripping the CRD breaker.	3.3.4 ACTION A	Table 3.3-1 Action 8	4
3.3.4 L04	CTS Table 4.3-1 Functional Unit 12, including Note 1 and Note 8, requires the performance of a CHANNEL FUNCTIONAL TEST of the CRD trip breakers, including the undervoltage and shunt trip devices, prior to each reactor startup if not performed in the previous 7 days. The ITS does not require this "during startup if not performed in the previous 7 days" test. This changes the CTS by deleting the requirement to perform the startup CHANNEL FUNCTIONAL TEST Surveillance on the CRD Trip Breakers, including the undervoltage and shunt trip devices.	None	Table 4.3-1 Functional Unit 12, including Notes 1 and 8	7

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.5 L01	Not used.	NA	NA	NA
3.3.5 L02	CTS Table 4.3-2 Functional Unit 1.b, Containment Pressure-High, and Functional Unit 1.c, Containment Pressure-High High require the performance of a CHANNEL FUNCTIONAL TEST every 31 days. This Surveillance is modified by Note 2 that states that the CHANNEL FUNCTIONAL TEST shall include transmitter exercising, by applying either vacuum or pressure to the appropriate side of the transmitter. SR 3.3.5.2 for ITS 3.3.5 Functions 3 and 4 does not include this requirement. This changes the CTS by deleting this Note.	None	Table 4.3-2 Note 2	6
3.3.6 L01	CTS Table 3.3-3 requires Functional Unit 3 (Manual Actuation), both the safety features actuation system (SFAS) and Containment Spray Manual Initiation Functional Units, to be OPERABLE in MODES 1, 2, 3, and 4. In addition, the MODES in which Surveillances are required (CTS Table 4.3-2 Function Unit 3.a, SFAS manual actuation) also includes MODES 1, 2, 3, and 4. However, the MODES in which Surveillances are required for the Containment Spray manual actuation is MODES 1, 2, and 3. ITS LCO 3.3.6 requires two channels of SFAS manual initiation and two channels of Containment Spray manual initiation to be OPERABLE in MODES 1, 2, 3, and MODE 4 when associated engineered safety feature equipment is required to be OPERABLE. This changes the CTS by relaxing the Applicability in MODE 4 so that the SFAS Manual Initiation Function is only required to be OPERABLE when the associated equipment it supports is required to be OPERABLE. This change also aligns the Applicability of the LCO with the Surveillances.	3.3.6	Table 3.3-3 Functional Unit 3, Table 4.3-2 Functional Unit 3.a	2

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.6 L02	CTS Table 3.3-3 Action 12 requires the restoration of the manual initiation Functional Units (CTS Table 3.3-3 Functional Units 3.a and 3.b) within 48 hours. ITS 3.3.6 ACTION A allows 72 hours to restore the channel to OPERABLE status. This changes the CTS by providing an additional 24 hours to restore a channel to OPERABLE status when any manual initiation channel is inoperable.	3.3.6 ACTION A	Table 3.3-3 Action 12	3
3.3.6 L03	CTS Table 4.3-2 Functional Unit 3.a (SFAS Manual Actuation) and Functional Unit 3.b (Containment Spray Manual Actuation) require the performance of a CHANNEL FUNCTIONAL TEST. CTS Table 4.3-2 Note 1 specifies that the manual actuation switches to be tested at least once per REFUELING INTERVAL and that all other circuitry associated with the manual safety feature actuation shall receive a CHANNEL FUNCTIONAL TEST at least once per 31 days. ITS SR 3.3.6.1 only requires the CHANNEL FUNCTIONAL TEST to be performed every 24 months consistent with the CTS REFUELING INTERVAL. This changes the CTS by deleting the 31 day CHANNEL FUNCTIONAL TEST requirements for all other circuitry associated with manual safety feature	SR 3.3.6.1	Table 4.3-2 Note 1	5
3.3.7 L01	CTS Table 3.3-3 requires Functional Unit 2 (Output Logic) to be OPERABLE in MODES 1, 2, 3, and 4. In addition, the MODES in which Surveillances are required (CTS Table 4.3-2 Function Unit 2) also include MODES 1, 2, 3, and 4. ITS LCO 3.3.7 requires the SFAS automatic logics to be OPERABLE in MODES 1, 2, 3, and MODE 4 when associated engineered safeguard equipment is required to be OPERABLE. This changes the CTS by relaxing the Applicability in MODE 4 so that the actuation logics are only required to be OPERABLE when the associated equipment it supports is required to be OPERABLE.	3.3.7	Table 3.3-3 Functional Unit 2, Table 4.3-2 Functional Unit 2	2

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.7 L02	CTS Table 3.3-3 Action 11, with any component in the Output Logic channels inoperable (CTS Table 3.3-3 Functional Units 2.a through 2.e), requires action to be taken within one hour to trip the associated components or to shut down the unit. ITS 3.3.7 ACTION A requires the associated output logic to be tripped, the associated component(s) to be placed in the safety feature configuration, or to declare the associated component(s) inoperable within 1 hour. This changes the CTS by providing additional options to either place the associated components in the safety features configuration or declare the associated components inoperable, in lieu of shutting down the unit.	3.3.7 ACTION A	Table 3.3-3 Action 11	4
3.3.7 L03	CTS Table 4.3-2 Functional Unit 2 (Output Logic) requires the performance of a CHANNEL CHECK every 12 hours and a CHANNEL CALIBRATION every 18 months. ITS 3.3.7 does not require these tests. This changes the CTS by deleting the CHANNEL CHECK and CHANNEL CALIBRATION requirements for the Output Logic channels.	None	Table 4.3-2 Functional Unit 2	5
3.3.7 L04	CTS Table 4.3-2 requires a CHANNEL FUNCTIONAL TEST on the SFAS Output Logic channels (Functional Unit 2) every 31 days. The Surveillance Frequency for ITS SR 3.3.7.1 is every 31 days on a STAGGERED TEST BASIS. This changes the CTS by extending the Frequency of testing a channel from 31 days to 62 days and placing the requirement to test the channels on a STAGGERED TEST BASIS.	SR 3.3.7.1	Table 4.3-2 Functional Unit 2	7

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.8 L01	CTS Table 3.3-3 Action 15.a requires, with the number of OPERABLE channels one less than the Minimum Units Operable per Bus, that the inoperable channel be placed in trip within 1 hour. If this action is not accomplished, the shutdown requirements of CTS 3.0.3 would apply. ITS 3.3.8 ACTION C requires, when the Required Action and associated CT are not met, that the associated EDG be immediately declared inoperable. This changes the CTS by allowing the associated EDG to be declared inoperable instead of entering CTS 3.0.3 and shutting down the unit.	3.3.8 ACTION C	Table 3.3-3 Action 15.a	4
3.3.8 L02	CTS Table 3.3-3 Action 15.b states that with the number of OPERABLE units two less than the Minimum Units Operable per bus to declare inoperable the EDG associated with the functional units not meeting the required minimum units OPERABLE and to take the Action required of Specification 3.8.1.1. This is addressed in ITS by Conditions and Required Actions B and C. ITS 3.3.8 ACTION B requires, with one or more Functions with two channels per bus inoperable, restoration of one channel per bus to OPERABLE status in 1 hour. This changes the CTS to allow two channels per bus of the Loss of Voltage and Degraded Voltage Functions to be inoperable for one hour before declaring the associated EDG inoperable.	3.3.8 ACTION B	Table 3.3-3 Action 15.a	4
3.3.8 L03	CTS 4.3-2 Functional Unit 4.b requires a CHANNEL CHECK of the Essential Bus Feeder Breaker Trip Degraded Voltage Relay. CTS 4.3-2 Functional Unit 4.c requires a CHANNEL CHECK of the Diesel Generator (DG) Start and Load Shed on Essential Bus, Loss of Voltage Relay. ITS 3.3.8 does not require a CHANNEL CHECK. This changes the CTS by not requiring a CHANNEL CHECK of the two relays.	None	4.3-2 Functional Units 4.b and 4.c	5

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.10 L01	CTS Tables 3.3-1 and 4.3-1 require the intermediate range neutron flux instrumentation to be OPERABLE and Surveillances required in MODES 1 and 2, and with the CRD trip breakers in the closed position and the CRD system capable of rod withdrawal. In addition, CTS Table 3.3-1 Action 4 allows operation to continue with one inoperable intermediate range monitor if THERMAL POWER is > 5 percent RTP (i.e., operation in MODE 1). ITS 3.3.10 does not require the monitors to be OPERABLE in MODE 1. This changes the CTS by eliminating all requirements for the intermediate range neutron flux instrumentation during MODE 1.	3.3.10 Applicability	Tables 3.3-1 and 4.3-1 Functional Unit 10, Table 3.3-1 Action 4.b	2
3.3.11 L01	Not used.	NA	NA	NA
3.3.11 L02	CTS Table 3.3-3 Action 16 states, in part, that with the number of OPERABLE channels one less than the Total Number of Channels, STARTUP and/or POWER OPERATION may proceed "until performance of the next required CHANNEL FUNCTIONAL TEST" provided the inoperable section of the channel is placed in the tripped condition within 1 hour. ITS 3.3.11 ACTION A, when one channel is inoperable, requires the inoperable channel to be placed in trip within 1 hour and does not include the restoration time limit of "until performance of the next required CHANNEL FUNCTIONAL TEST." This changes the CTS by allowing operation with an inoperable channel for an unlimited amount of time provided the inoperable channel is in the tripped condition.	3.3.11 ACTION A	Table 3.3-3 Action 16	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.13 L01	CTS Table 3.3-11 Action 16 states, in part, that with the number of OPERABLE channels one less than the Total Number of Channels, STARTUP and/or POWER OPERATION may proceed until performance of the next required CHANNEL FUNCTIONAL TEST provided the inoperable section of the channel is tripped in 1 hour. The Action does not provide the appropriate actions for inoperable actuation channels since the actuation channels cannot be placed in trip and the unit continue to operate. ITS 3.3.13 ACTION A requires entry when one actuation channel is inoperable for one or more Logic Functions and requires the restoration of the actuation channel to OPERABLE status within 72 hours. This changes CTS by replacing the CTS Action with a requirement to restore the inoperable channel to OPERABLE status within 72 hours.	3.3.13 ACTION A	Table 3.3-11 Action 16	4
3.3.14 L01	CTS Table 3.3-6 and CTS Table 4.3-3 specifies an Applicability of "With fuel in the storage pool or building." ITS 3.3.14 is applicable "During movement of irradiated fuel assemblies in the spent fuel pool building." This changes the CTS by restricting the Applicability of the radiation channels and performance of the Surveillance to only when there is a potential for a fuel handling accident.	3.3.14 Applicability	Table 3.3-6 Table 4.3-3	2

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.15 L01	While CTS 4.7.6.1 does not provide any SRs for the Station Vent Normal Range Radiation Monitoring instrumentation, it also does not provide a delayed entry into associated CTS 3.7.6.1 Actions if a channel is inoperable solely for performance of a Surveillance demonstrating the OPERABILITY of the Station Vent Normal Range Radiation Monitoring channel. ITS SR 3.3.15.2 includes a Note to allow delayed entry into associated Conditions and Required Actions for up to 3 hours if a Station Vent Normal Range Radiation Monitoring instrumentation channel is placed in an inoperable status solely for performance of the CHANNEL FUNCTIONAL TEST provided the other channel is OPERABLE. This changes the CTS by providing a delay time to enter Conditions and Required Actions for a Station Vent Normal Range Radiation Monitoring channel placed in an inoperable status solely for performance of the CHANNEL FUNCTIONAL TEST. The justification for adding the CHANNEL FUNCTIONAL TEST requirement (ITS SR 3.3.15.2) is provided in Discussion of Change M02.	SR 3.3.15.2	4.7.6.1	4
3.3.16 L01	CTS Table 3.3-17 Action 20.b) states that "one additional control rod drive trip breaker associated with another channel may be tripped for up to 2 hours for surveillance testing per Specification 4.3.2.3, after reclosing the control rod drive trip breaker opened in a) above." The ITS does not retain this specific allowance, but allows the CRD trip breaker associated with an inoperable ARTS output logic channel can be reclosed in lieu of complying with the Required Actions. This changes the CTS by removing the specific time limits a reactor trip breaker associated with an inoperable ARTS output logic channel can be reclosed for testing.	None	Table 3.3-17 Action 20	4



Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.17 L01	CTS 3.3.3.6 Action a requires placing the plant in HOT SHUTDOWN within the next 12 hours if an inoperable PAM instrumentation channel has not been restored within the allowed outage time. ITS 3.3.17 Required Action B.1 requires the initiation of a report to the NRC if one inoperable PAM instrumentation channel (for Functions in Table 3.3.17-1 other than Functions 13, 14, and 15) has not been restored within the associated CT. This changes the CTS by requiring a report be made in accordance with ITS 5.6.5 instead of requiring the unit to be in HOT SHUTDOWN with one required channel of a Function inoperable and not restored within the allowed outage time.	3.3.17 Required Action B.1	3.3.3.6 Action a	3
3.3.17 L02	CTS Table 3.3-10 Instrument 14 requires 3 channels of BWST Level to be OPERABLE. ITS Table 3.3.17-1 Function 16 only requires two channels to be OPERABLE. This changes the CTS by reducing the number of PAM BWST Level channels required to be OPERABLE from 3 to 2.	Table 3.3.17-1 Function 16	Table 3.3-10 Instrument 14	1
3.3.17 L03	CTS Table 4.3-10 Instrument 14 (BWST Level) requires performance of a Channel Check for the BWST Level every 12 hours. ITS Table 3.3.17-1 Function 16 requires performance of a CHANNEL CHECK for the BWST every 31 days. This changes the CTS by extending the Surveillance interval for performance of CHANNEL CHECK of the BWST Level Instrument 14 instrumentation from 12 hours to 31 days.	Table 3.3.17-1 Function 16, SR 3.3.17.1	Table 4.3-10 Instrument 14	7

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.1 L01	The CTS 3.2.5 Action requires the unit to reduce THERMAL POWER to < 5 percent of RTP within the next 4 hours if the DNB parameters are not restored to within limit in 2 hours. ITS 3.4.1 ACTION B requires the power reduction to ≤ 5 percent RTP (MODE 2) within the next 6 hours if the DNB parameters are not restored to within limit in 2 hours. This changes the CTS by extending the time for the unit to be placed outside the Applicability of the Specification. The change in the THERMAL POWER value is discussed in DOC A02.	3.4.1 ACTION B	3.2.5 Action	3
3.4.1 L02	CTS 4.2.5.2 requires RCS total flow rate be determined to be within limits once per 18 months. ITS SR 3.4.1.4 requires the same Surveillance, but includes a Note to allow the performance to be delayed for up to 24 hours after stable thermal conditions are established at ≥ 70 percent RTP. This changes the CTS by delaying performance of the Surveillance until adequate conditions exist to perform the Surveillance.	SR 3.4.1.4	4.2.5.2	7
3.4.2 L01	CTS 4.1.1.4 states that the RCS Tavg shall be determined to be ≥ 525°F within 15 minutes prior to achieving reactor criticality, and every 30 minutes when the reactor is critical and the RCS Tavg < 530°F. ITS SR 3.4.2.1 requires RCS Tavg in each loop to be verified ≥ 525°F every 12 hours. This changes the CTS by deleting the within 15 minutes prior to achieving criticality Frequency and the Surveillance Frequencies based on the condition of the reactor (critical) and RC temperature (< 530°F), and replacing them with a periodic 12 hour Frequency.	SR 3.4.2.1	4.1.1.4	7

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.3 L01	CTS 4.4.9.1.2 states that the reactor vessel material irradiation surveillance specimens representative of the vessel materials shall be removed and examined to determine changes in material properties, at the intervals defined in BAW-1543A. The results of these examinations shall be used to update Figures 3.4-1, 3.4-3, and 3.4-4. ITS 3.4.3 does not contain this Surveillance nor the Table. This changes the CTS by deleting the reactor vessel material irradiation SR.	None	4.4.9.1.2	5
3.4.4 L01	CTS 3.4.1.1 Action a, which applies when shifting from four RCPs operating to three RCPs operating, requires a reduction of the High Flux trip setpoint from the four RCPs operating to three RCPs operating trip setpoint within 4 hours. Under the same conditions, ITS 3.4.4 ACTION A requires the reduction in the trip setpoints within 10 hours. This changes the CTS by extending the CT to reduce the trip setpoints from "4 hours" to "10 hours."	3.4.4 ACTION A	3.4.1.1 Action a	3
3.4.4 L02	CTS 4.4.1.1.2 requires verification that the reactor protection system trip setpoints for the High Flux and Flux- $\Delta$ Flux-Flow Functions are properly set after shifting from four RCPs operating to three RCPs operating. The ITS does not include this additional Surveillance as part of ITS 3.4.4 ACTION A for the Flux- $\Delta$ Flux-Flow Function. This changes the CTS by not including this conditional Surveillance for the Flux- $\Delta$ Flux-Flow Function.	3.4.4 ACTION A	4.4.1.1.2	5

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.5 L01	<p>CTS 3.4.1.2 Action a, which applies when one or both required coolant loops are inoperable, states immediately initiate corrective action to return the required coolant loops to OPERABLE status as soon as possible, or be in COLD SHUTDOWN within 20 hours. ITS 3.4.5 ACTION A, which applies when one RCS loop is inoperable, requires restoration of the RCS loop to OPERABLE status within 72 hours. If not restored, ITS 3.4.5 ACTION B requires the unit to be in MODE 4 within 12 hours. This changes the CTS by allowing 72 hours to restore one inoperable RCS loop in lieu of requiring immediate action to be taken to restore the RCS loop, and allowing 12 hours to reach MODE 4 in lieu of 20 hours to reach MODE 5. Once in MODE 4, ITS 3.4.6 would become applicable.</p>	3.4.5 ACTIONS A and B	3.4.1.2 Action a	1
3.4.6 L01	<p>CTS 3.4.1.2 Action a requires a cooldown to COLD SHUTDOWN (MODE 5) within 20 hours under certain conditions. When a cooldown to MODE 5 is required in ITS 3.4.6 ACTION A, 24 hours are provided to be in MODE 5. This changes the CTS by extending the time allowed to reach MODE 5 from 20 hours to 24 hours.</p>	3.4.6 ACTION A	3.4.1.2 Action a	3
3.4.6 L02	<p>CTS 3.4.1.2 Action b states that when no coolant loops are in operation, all operations involving a reduction in boron concentration of the RCS must be suspended. ITS 3.4.6 Required Action B.1 states that operations that would cause introduction of coolant into the RCS with boron concentration less than required to meet the requirements of LCO 3.1.1, "SHUTDOWN MARGIN (SDM)," must be suspended. This relaxes the CTS Action by revising the action from suspending reductions in boron concentration to suspending introduction of coolant into the RCS with a boron concentration less than required to meet LCO 3.1.1.</p>	3.4.6 Required Action B.1	3.4.1.2 Action b	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.7 L01	CTS 3.4.1.2 Action b states that when no coolant loops are in operation, all operations involving a reduction in boron concentration of the RCS must be suspended. ITS 3.4.7 Required Action B.1 states that operations that would cause introduction of coolant into the RCS with boron concentration less than required to meet the requirements of LCO 3.1.1, "SHUTDOWN MARGIN (SDM)," must be suspended. This relaxes the CTS Action by revising the action from suspending reductions in boron concentration to suspending introduction of coolant into the RCS with a boron concentration less than required to meet LCO 3.1.1.	3.4.7 Required Action B.1	3.4.1.2 Action b	4
3.4.8 L01	CTS 3.4.1.2 places OPERABILITY requirements for the DHR loops to be OPERABLE and operating. ITS 3.4.8 specifies the same requirements; however, a new allowance is provided. ITS LCO 3.4.8 Note 2 allows one of the required DHR loops to be inoperable for up to 2 hours for Surveillance testing provided the other DHR loop is OPERABLE and in operation. This changes the CTS by adding this new allowance.	LCO 3.4.8 Note 2	3.4.1.2	1

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.8 L02	<p>CTS LCO 3.4.1.2 footnote **, in part, states that all decay heat removal (DHR) pumps may be de-energized for up to 1 hour provided no operations are permitted that would cause dilution of the RCS boron concentration. CTS 3.4.1.2 Action b states that when no coolant loops are in operation, all operations involving a reduction in boron concentration of the RCS must be suspended. The ITS LCO 3.4.8 Note 1 allows all DHR pumps to be removed from operation for a certain period of time provided no operations are permitted that would cause introduction of coolant into the RCS with boron concentration less than required to meet the requirements of LCO 3.1.1, "SHUTDOWN MARGIN (SDM)." ITS 3.4.8 Required Action B.1 states that operations that would cause introduction of coolant into the RCS with boron concentration less than required to meet the requirements of LCO 3.1.1 must be suspended. This relaxes the CTS Action and LCO footnote by revising the action and footnote from suspending reductions in boron concentration to suspending introduction of coolant into the RCS with a boron concentration less than required to meet LCO 3.1.1.</p>	LCO 3.4.8 Note 1 3.4.8 Required Action B.1	3.4.1.2 footnote ** 3.4.1.2 Action b	1
3.4.9 L01	<p>CTS 3.4.4.b states that the pressurizer shall be OPERABLE with a water level between 45 and 228 inches. ITS LCO 3.4.9.a states that the pressurizer shall be OPERABLE with a pressurizer water level <math>\leq</math> 228 inches. This changes the CTS by eliminating the lower water level limit of 45 inches.</p>	LCO 3.4.9.a	3.4.4.b	1
3.4.13 L01	<p>CTS 3.4.6.2.e requires that RCS leakage shall be limited to 10 gpm of CONTROLLED LEAKAGE. CTS 4.4.6.2.1.c requires a verification that the CONTROLLED LEAKAGE is within the limit every 31 days. ITS LCO 3.4.13 does not retain these requirements. This changes the CTS by deleting this LCO requirement.</p>	None	3.4.6.2.e 4.4.6.2.1.c	1

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.13 L02	CTS 4.4.6.2.1.a requires monitoring of the containment atmosphere gaseous or particulate radioactivity at least once per 12 hours. CTS 4.4.6.2.1.b requires monitoring the containment sump level and flow indication at least once per 12 hours. The ITS does not contain these SRs. This changes the CTS by eliminating these SRs.	None	4.4.6.2.1.a 4.4.6.2.1.b	5
3.4.14 L01	CTS 3.4.6.2.f is applicable in MODES 1, 2, 3, and 4. ITS 3.4.14 is applicable in MODES 1, 2, and 3, and in MODE 4, except valves in the DHR flow path when in, or the transition to or from, the DHR mode of operation. This changes the CTS by exempting the DHR flow path pressure isolation valves (PIVs) (CF-30, CF-31, DH-76, and DH-77) from the leakage requirements when in or during the transition to or from the DHR mode of operation.	3.4.14 Applicability	3.4.6.2.f	2
3.4.14 L02	CTS 3.4.6.2 Action b requires, in part, that if the RCS PIV leakage is not within limit, it must be restored within 4 hours. If RCS PIV leakage is not restored, either a unit shutdown is required or the requirements of CTS 3.4.6.2 Action c must be met. CTS 3.4.6.2 Action c states, in part, that with the integrity of any pressure isolation valve specified in Table 3.4-2 not demonstrated, power operation may continue provided at least two valves in each high pressure line that has a non-functional valve are in and remain in, the mode corresponding to the isolated condition. Therefore, the two CTS Actions result in requiring the two valves to be in the isolated condition within 4 hours. ITS 3.4.14 ACTION A contains this same requirements, but allows 4 hours to isolate the first valve and 72 hours to isolate the second valve. This changes the CTS by extending the time requirement to close the second valve from 4 hours to 72 hours.	3.4.14 ACTION A	3.4.6.2 Actions b and c	3

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.14 L03	CTS 4.4.6.2.2.c requires testing of RCS PIVs following maintenance, repair, or replacement work on the valve. ITS 3.4.14 does not include this requirement. This changes the CTS by eliminating a post-maintenance SR.	None	4.4.6.2.2.c	5
3.4.14 L04	CTS 4.4.6.2.3 provides additional compensatory measures to take, above those required by CTS 3.6.4.2 Action c, when leakage through an RCS PIV is not within limit. The CTS requires a daily leakage test of the remaining OPERABLE RCS PIV in the flow path or a combined leakage test of the two valves used to comply with CTS 3.6.4.2 Action c. In addition, the position of the second, non-RCS PIV valve is required to be recorded on a daily basis. ITS 3.4.14 does not include these additional compensatory measures. This changes the CTS by deleting the additional compensatory measures taken when leakage through an RCS PIV is not within limit.	None	4.4.6.2.3	5
3.4.14 L05	CTS Table 3.3-3 Action 13.a states, in part, that with the decay heat isolation valve interlock channel inoperable, both DHR Isolation Valves shall be verified closed. While no specific time is provided, the term "verified closed" implies this is an immediate action. ITS 3.4.14 ACTION C states, in part, that with the DHR System interlock function inoperable, isolate the affected penetration by use of two closed deactivated automatic valves within 4 hours. This changes the CTS by allowing 4 hours to complete the Required Action instead of the current immediate time.	3.4.14 ACTION C	Table 3.3-3 Action 13.a	3



Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.15 L01	CTS 3.4.6.1 Actions a and b.2 do not include an exclusion allowing a delay in performing an RCS water inventory balance. ITS 3.4.15 Required Action A.1 and Required Action B.1.2 include a Note that states "Not required until 12 hours after establishment of steady state operation." This changes the CTS by allowing 12 hours after establishment of steady state operation before the RCS water inventory balance must be performed.	3.4.15 Required Actions A.1 and B.1.2 Note	3.4.6.1 Actions a and b.2	4
3.4.16 L01	CTS 3.4.8 is applicable in MODES 1, 2, 3, 4, and 5. In addition, the testing for gross activity determination in CTS Table 4.4-4 Item 1 is required in MODES 1, 2, 3, and 4, and the isotopic analysis for iodine requirement in CTS Table 4.4-4 Item 4.a and 4.b is required periodically in MODES 1, 2, 3, 4, and 5 and after a 15 percent RTP change in MODES 1, 2, and 3, respectively. ITS 3.4.16, including the Surveillances, is applicable in MODES 1 and 2, and MODE 3 with RCS Tavg $\geq$ 530°F. This changes the CTS by reducing the MODES in which the LCO is applicable, including the Surveillances, to only MODES 1 and 2, and MODES 3 with RCS Tavg $\geq$ 530°F.	3.4.16 Applicability	3.4.8 Table 4.4-4 Items 1, 4.a, and 4.b	2
3.4.16 L02	CTS 3.4.8 does not allow the unit to change MODES when the RCS specific activity is not within limits. ITS 3.4.16 ACTION A Note specifies that LCO 3.0.4.c is applicable. This changes the CTS by allowing the unit to change MODES or other specified conditions in the Applicability when the specific activity for DOSE EQUIVALENT I-131 is $> 1.0 \mu\text{Ci/gm}$ .	3.4.16 ACTION A Note	3.4.8	9

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.16 L03	CTS 3.4.8 Action a (MODES 1, 2, 3, 4, and 5) and CTS Table 4.4-4 Item 4.a require isotopic analysis for iodine once per 4 hours when the specific activity exceeds $100/\bar{E}$ $\mu\text{Ci/gm}$ . The ITS does not contain this Action. This changes the CTS by eliminating a conditionally performed Surveillance when gross activity exceeds $100/\bar{E}$ $\mu\text{Ci/gm}$	None	3.4.8 Action a Table 4.4-4 Item 4.a	4
3.4.16 L04	CTS Table 4.4-4 Item 1 requires gross activity to be determined at least once per 72 hours. ITS SR 3.4.16.1 requires verification that the RC gross specific activity is $\leq 100/\bar{E}$ $\mu\text{Ci/gm}$ every 7 days. This changes the CTS by reducing the Frequency from at least once per 72 hours to 7 days.	SR 3.4.16.1	Table 4.4-4 Item 1	7
3.4.16 L05	CTS Table 4.4-4 Item 3 requires radiochemical determination of $\bar{E}$ once per 6 months. Footnote * states that the sample is to be taken after a minimum of 2 EFPD and 20 days of POWER OPERATION have elapsed since the reactor was last subcritical for 48 hours or longer. ITS SR 3.4.16.3 requires $\bar{E}$ to be determined from a sample taken in MODE 1 after a minimum of 2 effective full power days and 20 days of MODE 1 operation have elapsed since the reactor was last subcritical for $\geq 48$ hours. ITS SR 3.4.16.3 is further modified by a Note which states, "Not required to be performed until 31 days after a minimum of 2 effective full power days and 20 days of MODE 1 operation have elapsed since the reactor was last subcritical for $\geq 48$ hours." This changes the CTS by putting a limit, 31 days, on when the Surveillance must be performed after the requisite conditions are met.	SR 3.4.16.3	Table 4.4-4 Item 3, including footnote *	7
3.5.1 L01	Not used.	NA	NA	NA

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.5.1 L02	CTS 4.5.1.d requires verification that each CFT isolation valve opens automatically and is interlocked against closing whenever the RCS pressure exceeds 800 psig at least once per REFUELING INTERVAL. ITS 3.5.1 does not retain this requirement. This changes the CTS by deleting the SR.	None	4.5.1.d	5
3.5.2 L01	CTS 3.5.2 Action c requires that a Special Report be prepared and submitted to the NRC within 90 days following an ECCS actuation that results in water being injected into the RCS. The report is to include the description of the circumstances of the event and the total accumulated actuation cycles to date. ITS 3.5.2 does not include this requirement.	None	3.5.2 Action c	8
3.5.2 L02	Not used.	NA	NA	NA
3.5.2 L03	CTS 4.5.2.e.1 requires verification that each emergency core cooling system (ECCS) automatic valve in the flow path actuates to its correct position. ITS SR 3.5.2.4 requires verification that each ECCS automatic valve in the flow path "that is not locked, sealed, or otherwise secured in position" actuates to the correct position. This changes the CTS by excluding those ECCS automatic valves that are locked, sealed, or otherwise secured in position from the verification.	SR 3.5.2.4	4.5.2.e.1	6

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.5.2 L04	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 specify that the signal may be from either an actual or simulated (i.e., test) signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test. The change to remove the specific type of actuation signal (i.e., safety injection and SFAS) to be used for these SRs is discussed in DOC LA07.	SR 3.5.2.4 SR 3.5.2.5	4.5.2.e.1 and 2	6
3.5.2 L05	CTS 4.5.2.g.1 describes a test that must be performed following repositioning of or maintenance to certain low-pressure injection (LPI) system valves. The ITS does not include this testing requirement. This changes the CTS by deleting a conditional SR.	None	4.5.2.g.1	5
3.5.3 L01	CTS 3.5.3 Action b requires that a Special Report be prepared and submitted to the NRC within 90 days following an ECCS actuation that results in water being injected into the RCS. The report is to include the description of the circumstances of the actuation and the total accumulated actuation cycles to date. ITS 3.5.3 does not include this requirement.	None	3.5.3 Action b	8
3.6.1 L01	CTS 4.6.1.1.a.2 requires the primary containment equipment hatches to be verified closed every 31 days. The ITS does not include this requirement. This changes the CTS by deleting the specific SR to verify primary containment equipment hatches are closed.	None	4.6.1.1.a.2	5

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.2 L01	CTS 3.6.1.3 Action a, which applies when one air lock door or the interlock mechanism is inoperable in one air lock, does not provide an allowance for entry or exit through an air lock except for repair of the affected air lock components (footnote *). Note 2 to ITS 3.6.2 ACTION A, which applies when one air lock door is inoperable in an air lock, states that entry and exit is permissible for 7 days under administrative controls (ACs) if both air locks are inoperable. Note 2 to ITS 3.6.2 ACTION B, which applies when the interlock mechanism is inoperable in an air lock, states that entry and exit of containment is permissible under the control of a dedicated individual. This changes CTS by allowing entry and exit of containment under specified criteria for any reason when an air lock door or an interlock mechanism is inoperable.	3.6.2 ACTIONS A and B Note 2	3.6.1.3 Action a	4
3.6.2 L02	CTS 3.6.1.3 Action a does not address how to verify locked closed air lock doors in high radiation areas. ITS 3.6.2 Required Actions A.3 and B.3 contain a Note that provides an allowance for air lock doors in high radiation areas to be verified locked closed by administrative means when a containment air lock door or containment air lock interlock mechanism is inoperable. This changes CTS by allowing an air lock door in a high radiation area to be verified closed by administrative means.	3.6.2 Required Actions A.3 and B.3	3.6.1.3 Action a	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.3 L01	CTS 3.6.3.1 Actions b and c allows 4 hours to isolate the affected penetration when one or more of the containment isolation valve(s) are inoperable. ITS 3.6.3 ACTION C, which only applies to penetration flow paths with only one containment isolation valve, will allow 72 hours to isolate the affected penetration when the single containment isolation valve in the penetration is inoperable. This changes the CTS by extending the CT from 4 hours to 72 hours when the inoperable containment isolation valve is in a single valve penetration.	3.6.3 ACTION C	3.6.3.1 Actions b and c	3
3.6.3 L02	CTS 3.6.3.1 Actions b and c state that with one or more of the containment isolation valve(s) inoperable, isolate each affected penetration by use of at least one deactivated automatic valve secured in the isolation position (Action b), closed manual valve (Action c), or blind flange (Action c). CTS 4.6.1.1.a.1 requires a periodic verification that the affected penetration remains isolated by the same methods. When one or more penetration flow paths with one containment isolation valve inoperable, ITS 3.6.3 Required Action A.1 requires that the affected penetration flow path be isolated by use of at least one closed and de-activated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured. In addition, ITS 3.6.3 Required Action A.2 requires a periodic verification that the affected penetration remains isolated by one of the methods required by ITS 3.6.3 Required Action A.1. This changes the CTS by allowing penetration flow paths with two containment isolation valves that have one containment isolation valve inoperable to use a check valve with flow through the valve secured as the means of isolating the penetration flow path.	3.6.3 Required Action A.1	3.6.3.1 Actions b and c	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.3 L03	CTS 4.6.3.1.1 describes tests that must be performed prior to returning a valve to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit. The ITS does not include these testing requirements. This changes the CTS by deleting this post-maintenance Surveillance.	None	4.6.3.1.1	5
3.6.3 L04	CTS 4.6.3.1.3 states that the isolation time of each "power operated or automatic" containment isolation valve shall be determined to be within its limit. In addition, CTS LCO 3.6.3.1 Note * states that Surveillance testing of main steam isolation valves (MSIVs) MS100 and MS101 and atmospheric vent valves (AVVs) ICS11A and ICS11B is not required prior to entering MODE 4 but shall be performed prior to entering MODE 3. ITS SR 3.6.3.4 requires verification that the isolation time of each automatic power operated containment isolation valve is within limits. Furthermore, no Note allowance similar to the CTS Note allowance is provided for the MSIVs or the AVVs. This changes the CTS by deleting the requirement to test the power operated containment isolation valves that are not automatic.	SR 3.6.3.4	4.6.3.1.3 3.6.3.1 Note *	6
3.6.3 L05	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 specifies that the signal may be from either an "actual" or simulated (i.e., test) signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test.	SR 3.6.3.6	4.6.3.1.2.a	6

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.3 L06	CTS 4.6.3.1.2.a requires verification that each containment isolation valve actuates to its isolation position. ITS SR 3.6.3.6 requires verification that each automatic containment isolation valve "that is not locked, sealed, or otherwise secured in position" actuates to the isolation position. This changes the CTS by excluding those automatic valves that are locked, sealed or otherwise secured in position from the verification.	SR 3.6.3.6	4.6.3.1.2.a	5



Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.3 L07	<p>CTS 4.6.1.1.a requires verification that all non-automatic containment isolation valves that are required to be closed are closed every 31 days. If a non-automatic valve that is supposed to be closed is found open, the CTS 3.6.1.1 Action applies. CTS 3.6.1.1 Action states, in part, "Without primary CONTAINMENT INTEGRITY, restore CONTAINMENT INTEGRITY within one hour." ITS 3.6.3 ACTIONS A, B, and C do not differentiate between automatic and non-automatic valves and allow 1 hour, 4 hours, or 72 hours to isolate the affected flow path. In addition, ITS 3.6.3 ACTIONS Notes 2, 3 and 4 allow separate condition entry for each penetration flow path, require entry into the applicable Conditions and Required Actions for system(s) made inoperable by containment isolation valves, and require entry into the applicable Conditions and Required Actions for LCO 3.6.1, "Containment," when isolation valve leakage results in exceeding the overall containment leakage rate acceptance criteria. This changes the CTS by providing 1 hour, 4 hours, or 72 hours to isolate a penetration flow path affected by an inoperable non-automatic containment isolation valve. This also changes the CTS by allowing separate condition entry for each penetration flow path with an inoperable non-automatic containment isolation valve, requiring entry into the applicable Conditions and Required Actions for system(s) made inoperable by inoperable non-automatic containment isolation valves, and requiring entry into the applicable Conditions and Required Actions for LCO 3.6.1, "Containment," when isolation valve leakage due to an inoperable non-automatic containment isolation valve results in exceeding the overall containment leakage rate acceptance criteria.</p>	<p>3.6.3 ACTIONS A, B, and C 3.6.3 ACTIONS Notes 2, 3, and 4</p>	3.6.1.1 Action	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.3 L08	CTS 4.6.1.1.a.1 requires verification that specified containment penetrations are closed. ITS 3.6.3 Required Actions A.2 and C.2, ITS SR 3.6.3.2, and ITS SR 3.6.3.3 include similar requirements, but contain a Note that allows valves and blind flanges (i.e., isolation devices) in high radiation areas to be verified administratively. In addition, ITS 3.6.3 Required Actions A.2 and C.2 include a second Note that allows verification of isolation devices that are locked, sealed, or otherwise secured to also be performed using administrative means. This changes the CTS by allowing certain valves and blind flanges to not require physical verification.	3.6.3 Required Actions A.2 and C.2 Notes 1 and 2 SR 3.6.3.2 and SR 3.6.3.3 Note	4.6.1.1.a.1	6
3.6.3 L09	CTS 4.6.1.1.a.1 requires a verification that all penetrations not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves, secured in their positions. ITS SR 3.6.3.2 and ITS SR 3.6.3.3 require a verification that each containment isolation manual valve and blind flange that is located outside containment (ITS SR 3.6.3.2) or inside containment (ITS SR 3.6.3.3) and not locked, sealed, or otherwise secured and required to be closed during accident conditions is closed. This changes the CTS by not requiring valves locked, sealed or otherwise secured be verified closed as part of the Technical Specification SRs.	SR 3.6.3.2 SR 3.6.3.3	4.6.1.1.a.1	6

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.3 L10	<p>CTS 4.6.1.2.2 requires verification that the containment purge and exhaust valves leakage rate is within limits. If a containment purge and exhaust valve leakage rate is not within limits, the CTS 3.6.1.2 Action applies. CTS 3.6.1.2 Action states, in part, "With containment leakage rate(s) not within limit(s), restore containment leakage rate(s) within limit(s) within one hour." ITS 3.6.3 ACTION D requires the affected penetration flow path to be isolated by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange within 24 hours (ITS 3.6.3 Required Action D.1), verification that the penetration flow path remains isolated similar to that required for an inoperable containment isolation valve (ITS 3.6.3 Required Action D.2), and performance of ITS SR 3.6.3.5 every 92 days if a resilient seal purge or exhaust valve is used to isolate the penetration flow path (ITS 3.6.3 Required Action D.3). This changes the CTS by providing 24 hours to isolate the affected penetration flow path and allowing continued operation with a containment purge or exhaust valve not meeting the leakage rate limits.</p>	3.6.3 ACTION D	3.6.1.2 Action	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.3 L11	<p>CTS 3.6.1.7 provides additional requirements (above those required by CTS 3.6.3.1, the Containment Isolation Valve Specification) for the containment purge and exhaust valves. If one valve is open or power is not removed in a containment purge and/or exhaust penetration, the CTS 3.6.1.7 Action requires verifying the remaining valve in the associated penetration meets the requirements of CTS 4.6.1.7 (valve closed and power removed) within 4 hours and requires closing the open valve and removing control power within 24 hours. Furthermore, no actions are provided if both valves are open in a containment purge and/or exhaust penetration; thus CTS LCO 3.0.3 (which requires a unit shutdown) must be entered. ITS 3.6.3 ACTIONS A and B do not differentiate between containment purge and exhaust isolation valves and other types of containment isolation valves and allow 1 hour or 4 hours to isolate the affected flow path. ITS 3.6.3 ACTION A provides 4 hours to isolate the affected penetration when one valve is inoperable and ITS 3.6.3 ACTION B provides 1 hour to isolate the penetration when both valves are inoperable. Furthermore, ITS 3.6.3 ACTIONS A and B allow continued operation with an inoperable containment isolation valve, i.e., restoration of the inoperable valve is not required provided the associated penetration is isolated (and periodically verified isolated per ITS 3.6.3 Required Action A.2). This changes the CTS by allowing continued operation with an inoperable (due to being open or power not removed) purge or exhaust containment isolation valve provided the affected penetration is isolated and periodically verified isolated. This also changes the CTS by providing 1 hour to isolate a penetration flow path when two containment purge and/or exhaust isolation valves in the same penetration are inoperable (due to being open or power not removed).</p>	3.6.3 ACTIONS A and B	3.6.1.7 Action 3.0.3	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.3 L12	CTS 4.6.1.2.1 requires verification that the containment leakage rates are within limits. CTS 6.16.d.1) includes a secondary containment bypass leakage limit. If the secondary containment bypass leakage limit is not met, the CTS 3.6.1.2 Action applies. CTS 3.6.1.2 Action states, in part, "With containment leakage rate(s) not within limit(s), restore containment leakage rate(s) within limit(s) within one hour." ITS 3.6.3 ACTION E requires restoration of secondary containment bypass leakage within 4 hours. This changes the CTS by providing 4 hours to restore the secondary containment bypass leakage to within the limit.	3.6.3 ACTION E	3.6.1.2 Action	4
3.6.6 L01	CTS 4.6.2.1.b.1 requires verification that each automatic containment spray valve in the flow path actuates to its correct position. ITS SR 3.6.6.6 requires verification that each automatic containment spray valve in the flow path "that is not locked, sealed, or otherwise secured in position" actuates to the correct position. This changes the CTS by excluding those valves that are locked, sealed, or otherwise secured in position from the verification.	SR 3.6.6.6	4.6.2.1.b.1	5
3.6.6 L02	CTS 4.6.2.1.b.1 and 4.6.2.1.b.2 require verification of the automatic actuation of containment spray components on a containment spray or SFAS (respectively) "test" signal. CTS 4.6.2.2.b requires each containment cooling unit be verified to start automatically upon receipt of a SFAS "test" signal. ITS SR 3.6.6.6, SR 3.6.6.7, and SR 3.6.6.4 specify that the signal may be from either an "actual" or simulated (i.e., test) signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test.	SR 3.6.6.4 SR 3.6.6.6 SR 3.6.6.7	4.6.2.1.b.1 4.6.2.1.b.2	6

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.6 L03	When one containment cooling train is inoperable, the CTS 3.6.2.2 Action provides 72 hours to restore the inoperable containment cooling train to OPERABLE status. CTS 3.6.2.2 does not provide an Action for two containment cooling trains inoperable. Thus, CTS LCO 3.0.3 would be required to be entered, and a unit shutdown commenced. When one containment air cooling train is inoperable, ITS 3.6.6 ACTION C allows 7 days to restore the inoperable containment air cooling train to OPERABLE status. With two containment air cooling trains inoperable, ITS 3.6.6 ACTION E will allow 72 hours to restore one inoperable containment air cooling train prior to requiring a unit shutdown. This changes the CTS by allowing 7 days to restore an inoperable containment air cooling train when one train is inoperable and 72 hours to restore one of two inoperable containment air cooling trains prior to requiring a unit shutdown.	3.6.6 ACTION C 3.6.6 ACTION E	3.6.2.2 Action 3.0.3	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.7 L01	<p>CTS 3.5.2 provides requirements for the ECCS when in MODES 1, 2, and 3. CTS 4.5.2.d.4 requires the TSP storage baskets contain <math>\geq 290</math> ft<sup>3</sup> of TSP. If this Surveillance is not met, CTS 3.5.2 does not provide any Actions. Thus, CTS LCO 3.0.3 would be required to be entered. CTS LCO 3.0.3 provides 1 hour to initiate action and requires the unit to be placed in HOT STANDBY (MODE 3) within the next 6 hours and HOT SHUTDOWN (MODE 4) within the following 6 hours. CTS 3.5.3 provides requirements for the ECCS when in MODE 4. CTS 4.5.3 requires the ECCS subsystems to be demonstrated OPERABLE per the applicable SRs of CTS 4.5.2. Thus, for the required ECCS subsystems to be OPERABLE in MODE 4, CTS 4.5.2.d.4 must be met. Since there are no Actions provided in CTS 3.5.3 when the TSP baskets are not within the limit of CTS 4.5.2.d.4, CTS LCO 3.0.3 must also be entered. CTS LCO 3.0.3 requires the unit to be placed in COLD SHUTDOWN (MODE 5) within the subsequent 24 hours. ITS 3.6.7 provides the requirements for the TSP baskets. In the ITS, when the TSP storage baskets contain <math>&lt; 290</math> ft<sup>3</sup> of TSP, ITS 3.6.7 Condition A is entered. ITS 3.6.7 Required Action A.1 provides 72 hours to restore the TSP baskets to <math>\geq 290</math> ft<sup>3</sup> of TSP. If the required TSP volume is not restored, ITS 3.6.7 ACTION B requires the unit to be shut down to MODE 3 within 6 hours and MODE 5 within 84 hours. This changes the CTS by allowing 72 hours to restore the TSP baskets to within the limits and, if not restored, allows 84 hours for the unit to be placed in MODE 5.</p>	3.6.7 ACTIONS A and B	3.5.2 Actions 3.5.3 Actions 3.0.3	3

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.1 L01	CTS 3.7.1.1 Action a specifies the compensatory actions when one or more MSSVs are inoperable in MODES 1, 2, and 3. The action allows operation to continue provided that within 4 hours, either the inoperable valve is restored to OPERABLE status or the High Flux Trip Setpoint is reduced in accordance with the requirements of Equation 3.7-1. ITS 3.7.1 Required Action A.2 requires the reduction of the High Flux Trip setpoint in accordance with Equation 3.7.1-1 within 36 hours. This changes the CTS by extending the time allowed to reduce the High Flux Trip setpoint. The change that deletes the restoration option is discussed in DOC A03.	3.7.1 Required Action A.2	3.7.1.1 Action a	3
3.7.2 L01	CTS 3.7.1.5 is applicable in MODES 1, 2, and 3. CTS 3.6.3.1 is applicable in MODES 1, 2, 3, and 4. ITS LCO 3.7.2 is applicable in MODE 1, and in MODES 2 and 3 except when all MSIVs are closed. This changes the CTS by making the Specification not applicable in MODES 2 and 3 when all MSIVs are closed. The change to the MODE 4 requirement is discussed in DOC L03.	3.7.2 Applicability	3.7.1.5 Applicability 3.6.3.1 Applicability	2



Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.2 L02	<p>CTS 3.7.1.5 Action MODE 1, in part, requires that when one MSIV is inoperable, the MSIV is restored to OPERABLE status or closed within 4 hours or a shutdown is required. CTS 3.7.1.5 Action MODES 2 and 3, in part, requires that when one MSIV is inoperable, the MSIV is to be maintained closed or a shutdown is required. CTS 3.6.3.1 also provides two alternate actions for inoperable MSIVs. CTS 3.6.3.1 Action a requires restoration of the inoperable MSIV within 4 hours and CTS 3.6.3.1 Action c requires the affected penetration flow path to be isolated by use of a closed manual valve (i.e., the MSIV) within 4 hours. ITS 3.7.2 ACTION A allows 8 hours to restore an inoperable MSIV prior to requiring a unit shutdown when in MODE 1. ITS 3.7.2 ACTION C allows 8 hours to close an inoperable MSIV prior to requiring a unit shutdown when in MODE 2 or 3. This changes the time allowed in the CTS to restore an inoperable MSIV from 4 hours to 8 hours when in MODE 1 and changes the time to close an inoperable MSIV from immediately (i.e., "maintained" closed implies an immediate requirement) or 4 hours to 8 hours when in MODE 2 or 3. The deletion of the closure allowance in CTS 3.7.1.5 Action MODE 1 is discussed in DOC M01.</p>	3.7.2 ACTIONS A and C	<p>3.7.1.5 Action MODE 1 3.7.1.5 Action MODES 2 and 3 3.6.3.1 Actions a and c</p>	3

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.2 L03	<p>CTS 3.6.3.1 requires the MSIVs to be OPERABLE in MODES 1, 2, 3, and 4. Furthermore, when one or more MSIVs are inoperable and a unit shutdown is required by CTS 3.6.3.1 Action d, the unit must be in HOT STANDBY (MODE 3) within 6 hours and in COLD SHUTDOWN (MODE 5) within the following 30 hours. ITS 3.7.2 requires the MSIVs to be OPERABLE in MODE 1, and MODES 2 and 3 except when all MSIVs are closed. When a shutdown of the unit is required due to an inoperable MSIV, ITS 3.7.2 ACTION D requires the unit to be in MODE 3 within 6 hours and MODE 4 within 12 hours. This changes the CTS by deleting the MODE 4 requirements for the MSIVs. Due to this change, the shutdown action has also been changed to only require entry into MODE 4, which exits the new Applicability. The change in the Applicability related to the exception concerning closed MSIVs is discussed in DOC L01.</p>	3.7.2 Applicability 3.7.2 ACTION D	3.6.3.1 Applicability 3.6.3.1 Action d	2
3.7.2 L04	<p>CTS 3.6.3.1 provides the actions for an inoperable MSIV. CTS 3.6.1.3 Action a requires the restoration of the inoperable MSIV and if not restored, CTS 3.6.1.3 Action d requires a unit shutdown to COLD SHUTDOWN (MODE 5). When in MODE 1, if an inoperable MSIV is not restored to OPERABLE status, ITS 3.7.2 ACTION B only requires a unit shutdown to MODE 2. Once in MODE 2, ITS 3.7.2 ACTION C allows an additional 8 hours to close the inoperable MSIV and requires verification every 7 days the MSIV is closed. This changes the CTS by allowing the unit an additional 8 hours to close the inoperable MSIV once the unit has been placed in MODE 2. The change also requires periodic verification the MSIV is closed.</p>	3.7.2 ACTIONS B and C	3.6.3.1 Actions a and d	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.2 L05	CTS 4.6.3.1.1 describes tests that must be performed prior to returning a main feedwater safety valve (MFSV) to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit. The ITS does not include these testing requirements. This changes the CTS by deleting this post-maintenance Surveillance.	None	4.6.3.1.1	5
3.7.3 L01	CTS 3.7.1.8 is applicable in MODES 1, 2, and 3. CTS 3.6.3.1 is applicable in MODES 1, 2, 3, and 4. ITS LCO 3.7.3 is applicable in MODES 1, 2, and 3 except when all MFSVs, main feedwater control valves (MFCVs), and startup feedwater control valves (SFCVs) are closed or isolated by a closed manual valve. This changes the CTS by making the Specifications not applicable in MODES 1, 2, and 3 when all MFSVs, MFCVs, and SFCVs are closed or isolated by a closed manual valve. The change in the MODE 4 Applicability for CTS 3.6.3.1 is discussed in DOC L02.	3.7.3 Applicability	3.7.1.8 Applicability	2

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.3 L02	<p>CTS 3.6.3.1 requires the MFSVs to be OPERABLE in MODES 1, 2, 3, and 4. Furthermore, when one or more MFSVs are inoperable and a unit shutdown is required by CTS 3.6.3.1 Action d, the unit must be in HOT STANDBY (MODE 3) within 6 hours and in COLD SHUTDOWN (MODE 5) within the following 30 hours. ITS 3.7.3 requires the MFSVs to be OPERABLE in MODES 1, 2, and 3 except when all MFSVs, MFCVs, and SFCVs are closed or isolated by a closed manual valve. When a shutdown of the unit is required due to an inoperable MFSV, ITS 3.7.3 ACTION E requires the unit to be in MODE 3 within 6 hours and MODE 4 within 12 hours. This changes the CTS by deleting the MODE 4 requirements for the MFSVs. Due to this change, the shutdown action has also been changed to only require entry into MODE 4, which exits the new Applicability. The change in the Applicability related to the exception concerning closed or isolated MFSVs, MFCVs, and SFCVs is discussed in DOC L01.</p>	3.7.3 Applicability 3.7.3 ACTION E	3.6.3.1 Applicability 3.6.3.1 Action d	2
3.7.3 L03	<p>CTS 3.6.3.1 Action c allows 4 hours to isolate the affected penetration when one or more of the MFSVs are inoperable. ITS 3.7.3 ACTION A will allow 72 hours to close or isolate the MFSV when a MFSV is inoperable, and once isolated, will require verification that the flowpath remains isolated every 7 days. However, if a MFSV and a MFCV or a SFCV in the same flowpath are concurrently inoperable, ITS 3.7.3 ACTION D will only allow 8 hours to isolate the affected flowpath. This changes the CTS by extending the CT from 4 hours to 72 hours when a MFSV is inoperable and from 4 hours to 8 hours when both a MFSV and either a MFCV or SFCV in the same flowpath are concurrently inoperable.</p>	3.7.3 ACTIONS A and D	3.6.3.1 Action c	3

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.3 L04	CTS 4.6.3.1.1 describes tests that must be performed prior to returning a MFSV to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit. The ITS does not include these testing requirements. This changes the CTS by deleting this post-maintenance Surveillance.	None	4.6.3.1.1	5
3.7.4 L01	CTS 3.7.1.9 is applicable in MODES 1, 2, and 3. ITS LCO 3.7.4 is applicable in MODE 1, and in MODES 2 and 3 except when all TSVs are closed. This changes the CTS by making the Specification not applicable in MODES 2 and 3 when all TSVs are closed.	3.7.4 Applicability	3.7.1.9 Applicability	2
3.7.5 L01	CTS 3.7.1.2 Action a requires an inoperable train of auxiliary feedwater (AFW) be restored to OPERABLE status within 72 hours for any condition of inoperability. ITS 3.7.5 ACTION A permits 7 days to restore the steam supply valve to an OPERABLE status when an AFW train is inoperable due to one inoperable steam supply valve or if an AFW train is inoperable in MODE 3 following refueling. This changes the CTS by extending the restoration time from 72 hours to 7 days for an inoperable AFW train due to these conditions.	3.7.5 ACTION A	3.7.1.2 Action a	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.5 L02	<p>CTS 3.7.1.2 Action c states that if the SG inlet valve AF 599 or AF 608 is closed, to re-open the closed valve within 1 hour or be in HOT STANDBY (MODE 3) within 6 hours and HOT SHUTDOWN (MODE 4) within the following 6 hours. When either of these two valves is closed during normal operations, both AFW trains and the motor driven feedwater pump (MDFP) train are inoperable. However, no other conditions describing inoperability of the AFW trains are provided. Thus, if the two AFW trains are inoperable for other reasons, CTS 3.0.3, which requires a unit shutdown to commence within 1 hour, must be entered. ITS 3.7.5 ACTION E provides specific actions when all three emergency feedwater (EFW) trains are inoperable, and requires action to be initiated immediately to restore one EFW train to OPERABLE status. In addition, the Note to ITS 3.7.5 Required Action E.1 states that LCO 3.0.3 and all other LCO Required Actions requiring MODE changes are suspended until one EFW train is restored to OPERABLE status. This changes the CTS by providing an Action to maintain the unit in the current MODE when both AFW trains and the MDFP train are inoperable, and require actions to be immediately initiated to restore one of the EFW trains to OPERABLE status, in lieu of requiring a unit shutdown within 1 hour</p>	3.7.5 ACTION E	3.7.1.2 Action c 3.0.3	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.5 L03	<p>CTS 4.7.1.2.1.a.1 states that each AFW train shall be demonstrated OPERABLE at least once every 92 days "on a STAGGERED TEST BASIS" by verifying the differential pressure of each AFW pump is greater than or equal to the required differential pressure at the specified recirculation flow rate. CTS 4.7.1.2.1.b.1 requires verifying each AFW train valve (power operated or automatic) in the flow path is in its correct position at least once per 31 days "on a STAGGERED TEST BASIS." ITS SR 3.7.5.2 and SR 3.7.5.1 require similar tests every 92 days and every 31 days, respectively, but do not include the "STAGGERED TEST BASIS" requirement. This changes the CTS by deleting the requirement to test on a STAGGERED TEST BASIS.</p>	<p>SR 3.7.5.1 SR 3.7.5.2</p>	<p>4.7.1.2.1.a.1 4.7.1.2.1.b.1</p>	<p>7</p>

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.5 L04	<p>CTS 4.7.1.2.1.b.1 requires the verification that each power operated or automatic valve in the AFW flow path is in its correct position. CTS 4.7.1.2.1.b.2 requires the verification that all manual valves in the AFW pump suction and discharge lines that affect the system's capacity to deliver water to the SG are locked in their proper position. CTS 4.7.1.7.b.1 requires the verification that all manual valves in the Motor Driven Feedwater Pump suction and discharge lines that affect the system's capacity to deliver water to the SG are locked in their proper position. CTS 4.7.1.7.b.2 requires the verification that each power operated valve in the Motor Driven Feedwater Pump flow path is in its correct position when &gt; 40 percent RTP. 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 percent RTP and in MODES 2 and 3. ITS SR 3.7.5.1 requires verifying that each EFW manual, power operated, and automatic valve in each water flow path and in both steam supply flow paths to the AFW pumps, that is not locked, sealed, or otherwise secured in position, is in the correct position (or can be aligned as allowed by the Note to SR 3.7.5.1). This changes the CTS by only requiring the verification of EFW valves that are not locked, sealed or otherwise secured in position.</p>	SR 3.7.5.1	<p>4.7.1.2.1.b.1 4.7.1.2.1.b.2 4.7.1.7.b.1 4.7.1.7.b.2 4.7.1.7.b.3</p>	6



Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.5 L05	CTS 4.7.1.2.1.c.1 requires that each AFW automatic valve in the flow path actuate to the correct position on a steam and feedwater rupture control system (SFRCS) actuation signal. ITS SR 3.7.5.4 requires a similar Surveillance. However, it is modified by a Note that states the SR is not required to be performed until 24 hours after reaching 800 psig in the SGs. This changes the CTS by providing an allowance to delay the performance of required testing without requiring the associated AFW train to be declared inoperable.	SR 3.7.5.4	4.7.1.2.1.c.1	6
3.7.5 L06	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 an SFRCS actuation test signal. ITS SR 3.7.12.3, which performs a similar test, specifies that the signal may be from either an "actual" or simulated (i.e., test) signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test.	SR 3.7.12.3	4.7.1.2.1.c.1 4.7.1.2.1.c.2	6
3.7.5 L07	CTS 4.7.1.2.f and 4.7.1.7.e (including footnote *) describe tests that must be performed following modification or repairs to the AFW trains and MDFP trains, respectively. ITS 3.7.5 does not include these testing requirements. This changes the CTS by deleting these post-maintenance SRs.	None	4.7.1.2.f 4.7.1.7.e	7
3.7.5 L08	CTS 4.7.1.7.d.3 requires verifying, at least once each refueling interval (i.e., 24 months), proper operation of manual valves by shifting the MDFP between the Main Feedwater System and the AFW System. ITS 3.7.5 does not include this specific SR. This changes the CTS by deleting a SR.	None	4.7.1.7.d.3	5

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.6 L01	With the CSTs inoperable, CTS 3.7.1.3 Action a requires restoration of the CSTs within 4 hours or be in MODE 4 within the next 12 hours, while CTS 3.7.1.3 Action b requires demonstration of OPERABILITY of the backup supply within 4 hours and restoration of the CSTs to OPERABLE status within 7 days or be in MODE 4 within the next 12 hours. ITS 3.7.6 Required Action A.1 requires the verification of OPERABILITY of the backup water supply within 4 hours and Required Action A.2 requires the CSTs to be restored to OPERABLE status within 7 days. If any of these Required Actions are not met within the associated CT, ITS 3.7.6 ACTION B requires the unit to be in MODE 3 within 6 hours and in MODE 4 without reliance on SG for heat removal within 24 hours. This changes the time to be in MODE 4 without reliance on the SGs for heat removal from 12 hours to 24 hours and adds an additional requirement to be in MODE 3 within 6 hours.	3.7.6 ACTION B	3.7.1.3 Actions a and b	3
3.7.7 L01	CTS 4.7.3.1.b.1 and 4.7.3.1.b.2 require verification of the automatic actuation of component cooling water components on an SFAS "test" signal. ITS SR 3.7.7.2 and SR 3.7.7.3 specify that the signal may be from either an "actual" or simulated (i.e., test) signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test.	SR 3.7.7.2 SR 3.7.7.3	4.7.3.1.b.1 4.7.3.1.b.2	6
3.7.7 L02	CTS 4.7.3.1.b.1 requires verification that each CCW automatic valve in the flow path actuates to its correct position. ITS SR 3.7.7.2 requires verification that each CCW automatic valve in the flow path "that is not locked, sealed, or otherwise secured in position" actuates to the correct position. This changes the CTS by excluding those valves that are locked, sealed, or otherwise secured in position from the verification.	SR 3.7.7.2	4.7.3.1.b.1	5

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.8 L01	CTS 4.7.4.1.b.1 and 4.7.4.1.b.2 require verification of the automatic actuation of service water system (SWS) components on an SFAS "test" signal. ITS SR 3.7.8.2 and SR 3.7.8.3 specify that the signal may be from either an "actual" or simulated (i.e., test) signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test	SR 3.7.8.2 SR 3.7.8.3	4.7.4.1.b.1 4.7.4.1.b.2	6
3.7.8 L02	CTS 4.7.4.1.b.1 requires verification that each SWS automatic valve in the flow path actuates to its correct position. ITS SR 3.7.8.2 requires verification that each SWS automatic valve in the flow path "that is not locked, sealed, or otherwise secured in position" actuates to the correct position. This changes the CTS by excluding those SWS automatic valves that are locked, sealed, or otherwise secured in position from the verification.	SR 3.7.8.2	4.7.4.1.b.1	5
3.7.9 L01	The CTS 3.7.5.1 Action states to be in HOT STANDBY in 2.5 hours and in COLD SHUTDOWN in the following 30 hours when the UHS is inoperable. ITS 3.7.9 ACTION A states to be in MODE 3 in 6 hours and in MODE 5 in 36 hours when the UHS is inoperable. This changes the CTS by providing an additional 3.5 hours to be in MODE 3 and in MODE 5.	3.7.9 ACTION A	3.7.5.1 Action	3

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.10 L01	<p>CTS 3.7.6.1 requires two CREVS trains to be OPERABLE. Included as part of the OPERABILITY of the CREVS trains is the control room envelope (CRE) boundary. CTS 3.7.6.1 Action a provides the actions for when one CREVS train is inoperable, however no actions are provided when both trains are inoperable, such as when the CRE boundary is inoperable. In this situation, CTS 3.0.3 must be entered, which requires a unit shutdown. In addition, CTS 3.7.6.1 does not address the CRE boundary being opened intermittently (such as for routine entry and exit) under ACs. ITS LCO 3.7.10 also requires the two CREVS trains to be OPERABLE, however Note 1 to the LCO is included that allows the CRE boundary to be opened intermittently under ACs. ITS 3.7.10 ACTION B provides actions for when the CRE boundary is inoperable in MODE 1, 2, 3, or 4. The action allows up to 90 days to restore the CRE boundary before requiring a unit shutdown. Also, ITS SR 3.7.10.4 is added to verify the OPERABILITY of the CRE boundary by testing for unfiltered air inleakage past the CRE boundary and into the CRE, in accordance with the CRE Habitability Program. The program details are discussed in the Discussion of Changes for ITS 5.5. This changes the CTS by allowing the CRE boundary to be opened intermittently under ACs and not consider both CREVS trains to be inoperable and provides time to restore an inoperable CRE boundary prior to requiring a unit shutdown.</p>	<p>LCO 3.7.10 Note 1 3.7.10 ACTION B SR 3.7.10.4</p>	<p>3.7.6.1 3.7.6.1 Actions 3.0.3</p>	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.10 L02	CTS 4.7.6.1.b states that each CREVS train shall be demonstrated OPERABLE at least once every 31 days "on a STAGGERED TEST BASIS" 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 requires a similar test every 31 days, but does not include the "STAGGERED TEST BASIS" requirement. This changes the CTS by deleting the requirement to test on a STAGGERED TEST BASIS.	SR 3.7.10.1	4.7.6.1.b	7
3.7.10 L03	CTS 4.7.6.1.e.2 requires verification of the automatic isolation of the Control Room Normal Ventilation System on an "SFAS" test signal and a "Station Vent Normal Range Radiation monitoring" test signal. ITS SR 3.7.12.3 specifies that the signal may be from either an "actual" or simulated (i.e., test) signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test.	SR 3.7.12.3	4.7.6.1.e.2	6
3.7.11 L01	CTS 3.7.6.1 Action a allows 7 days to restore an inoperable CREVS train to OPERABLE status. ITS 3.7.11 ACTION A allows 30 days to restore an inoperable control room emergency air temperature control system (CREATCS) train to OPERABLE status. This changes the CTS by increasing the time allowed to restore the inoperable components from 7 days to 30 days. The change from CREVS to CREATCS is discussed in DOC A02.	3.7.11 ACTION A	3.7.6.1 Action a	3

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.11 L02	CTS 4.7.6.1.a requires verification every 12 hours that the control room air temperature is $\leq 110^{\circ}\text{F}$ when the CREVS is operating. ITS 3.7.11 does not include this requirement. However, ITS SR 3.7.11.1 requires verification that each CREATCS train has the capability to remove the assumed heat load every 24 months. This changes the CTS by eliminating the SR to verify control room air temperature every 12 hours and adding a SR to verify each CREATCS train has the capability to remove the assumed heat load every 24 months.	SR 3.7.11.1	4.7.6.1	5
3.7.12 L01	CTS 4.6.5.1.a states that each Station, emergency ventilation system (EVS) train shall be demonstrated OPERABLE at least once every 31 days "on a STAGGERED TEST BASIS" 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 3.7.12.1 requires a similar test every 31 days, but does not include the "STAGGERED TEST BASIS" requirement. This changes the CTS by deleting the requirement to test on a STAGGERED TEST BASIS.	SR 3.7.12.1	4.6.5.1.a	7
3.7.12 L02	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 specifies that the signal may be from either an "actual" or simulated (i.e., test) signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test.	SR 3.7.12.3	4.6.5.1.d.2	6
3.7.12 L03	CTS 4.6.5.2.1 requires the shield building area negative pressure boundary airtight doors and blowout panel to be verified closed once per 31 days. ITS 3.7.12 does not include this Surveillance. This changes the CTS by deleting this specific Surveillance.	None	4.6.5.2.1	5

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.12 L04	CTS 4.6.5.2.1, in part, specifies that doors in the shield building area negative pressure boundary may be opened during normal transit entry and exit. ITS 3.7.12 includes this allowance in an LCO Note, which states that the shield building area negative pressure boundary may be opened intermittently under AC. This changes the CTS by allowing the shield building area negative pressure boundary to be opened for more reasons than is specified in the CTS.	LCO 3.7.12 Note	4.6.5.2.1	1
3.7.12 L05	CTS 4.6.5.2.2 requires verification that each EVS train can drawdown the shield building area to a negative pressure of $\geq 0.25$ inches water gauge in the annulus within 4 seconds after the fan attains a flow rate $\geq 7200$ cfm and $\leq 8800$ cfm at least once per Refueling Interval (i.e., 24 months). ITS SR 3.7.12.4 requires this same test, however it is required to be performed using one Station EVS train every 24 months "on a STAGGERED TEST BASIS." This changes the CTS by requiring the test to be performed using each Station EVS train at least once per 48 months.	SR 3.7.12.4	4.6.5.2.2	7
3.7.13 L01	CTS 3.9.12, in part, specifies that both doors of the containment personnel air lock may be opened under AC (a designated individual who can close the door when needed). ITS 3.7.13 includes this allowance in an LCO Note, which states that the spent fuel pool area negative pressure boundary may be opened under AC. This changes the CTS by allowing the spent fuel pool area negative pressure boundary to be opened for more reasons than is specified in the CTS.	LCO 3.7.13 Note	3.9.12	1

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.13 L02	CTS 3.9.12 states, in part, that the requirements for the Spent Fuel Pool Area EVS trains are applicable "Whenever irradiated fuel assemblies is in the spent fuel pool." ITS 3.7.13 is applicable "During movement of irradiated fuel assemblies in the spent fuel pool building." This changes the CTS by restricting the Applicability to only when there is a potential for a fuel handling accident in the spent fuel pool building, i.e., during the movement of irradiated fuel assemblies in the spent fuel pool building.	3.7.13 Applicability	3.9.12 Applicability	2
3.7.13 L03	CTS 3.9.12, in part, allows the acceptance criteria of CTS 4.9.12.1 to not be met solely due to the containment equipment hatch being open in combination with both doors of the personnel airlock being open. The Applicability of CTS 3.9.12 includes CORE ALTERATIONS or movement of irradiated fuel within the containment with the containment equipment hatch open. CTS 3.9.12 Action b provides the actions when one Spent Fuel Pool Area EVS train is inoperable during CORE ALTERATIONS or movement of irradiated fuel within the containment with the containment equipment hatch open. CTS 3.9.12 Action c, in part, provides the actions when both Spent Fuel Pool Area EVS trains are inoperable during CORE ALTERATIONS or movement of irradiated fuel within the containment with the containment equipment hatch open. ITS 3.7.13 does not include Spent Fuel Pool EVS requirements during CORE ALTERATIONS or movement of irradiated fuel within the containment with the containment equipment hatch open. This changes the CTS by deleting the requirements for the Spent Fuel Pool EVS to be OPERABLE during CORE ALTERATIONS or movement of irradiated fuel within the containment with the containment equipment hatch open.	3.7.13 Applicability	3.9.12 Applicability 3.9.12 Actions b and c	2



Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.13 L04	When a Spent Fuel Pool Area EVS train is inoperable, CTS 3.9.12 Action a allows fuel movement in the spent fuel pool to continue, provided the OPERABLE Spent Fuel Pool Area EVS train is in operation. No time is provided to restore the inoperable train prior to requiring the OPERABLE train to be in operation. ITS 3.7.13 ACTION A allows 7 days to restore an inoperable Spent Fuel Pool Area EVS train prior to requiring the OPERABLE train to be placed in operation. This changes the CTS by allowing 7 days to restore an inoperable Spent Fuel Pool Area EVS train prior to placing the OPERABLE train in operation.	3.7.13 ACTION A	3.9.12 Action a	4
3.7.13 L05	CTS 3.9.12 Actions a and c provide an option that when one or both Spent Fuel Pool Area EVS trains are inoperable, to immediately suspend fuel movement and crane operations with loads over the spent fuel pool. Under similar conditions, ITS 3.7.13 Required Actions B.2 and C.1 require immediate suspension of movement of irradiated fuel assemblies in the spent fuel pool. This changes the CTS by deleting the requirement to suspend non-irradiated fuel assembly movement and to suspend crane operations over the spent fuel pool.	3.7.13 Required Actions B.2 and C.1	3.9.12 Actions a and c	4
3.7.13 L06	CTS 4.9.12.1 requires verification that each Spent Fuel Pool Area EVS train can maintain $\geq 0.125$ inches vacuum water gauge relative to the outside atmosphere at least once per Refueling Interval (i.e., 24 months). ITS SR 3.7.13.4 requires this same test, however it is required to be performed every 24 months "on a STAGGERED TEST BASIS." This changes the CTS by requiring the test to be performed using each Spent Fuel Pool Area EVS train at least once per 48 months.	SR 3.7.13.4	4.9.12.1	7

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.13 L07	CTS 4.9.12.2 requires verification of the automatic actuation of the Spent Fuel Pool Area EVS trains on a fuel storage area high radiation "test" signal. ITS SR 3.7.13.3 specify that the signal may be from either an actual or simulated (i.e., test) signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test. The change to remove the specific type of actuation signal (i.e., fuel storage area high radiation) to be used for this SR is discussed in DOC LA04.	SR 3.7.13.3	4.9.12.2	6
3.7.13 L08	CTS 4.6.5.1.a states that each EVS train shall be demonstrated OPERABLE at least once every 31 days "on a STAGGERED TEST BASIS" 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 requires a similar test every 31 days, but does not include the "STAGGERED TEST BASIS" requirement. This changes the CTS by deleting the requirement to test on a STAGGERED TEST BASIS.	SR 3.7.13.1	4.6.5.1.a	7

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.14 L01	CTS 3.9.11 states that the requirements on storage pool water level are applicable "Whenever irradiated fuel assemblies are in the spent fuel pool." CTS 4.9.11 requires the water level in the spent fuel pool to be verified every 7 days "when irradiated fuel assemblies are in the spent fuel pool." ITS 3.7.14 is applicable "During movement of irradiated fuel assemblies in the spent fuel pool." ITS SR 3.7.14.1 requires verification of the spent fuel pool water level every 7 days. This changes the CTS by restricting the Applicability of the spent fuel pool water level Specification and performance of the Surveillance to only when there is a potential for a fuel handling accident, i.e., during the movement of irradiated fuel assemblies in the fuel storage pool. In addition, since the Applicability is now limited to when irradiated fuel is being moved, the CTS Action to restore water level to within its limit within 4 hours after movement of fuel has been suspended has also been deleted.	3.7.14 Applicability SR 3.7.14.1	3.9.11 Applicability 3.9.11 Action 4.9.11	2
3.7.14 L02	CTS 3.9.11 Action states that when the spent fuel pool water level is not met, suspend all movement of fuel and crane operations with loads in the spent fuel pool area. ITS 3.7.14 Required Action A.1 states that when spent fuel pool water level is not within limit, immediately suspend movement of irradiated fuel assemblies in the spent fuel pool. This changes the CTS by deleting the requirement to suspend non-irradiated fuel assembly movement and to suspend crane operations over the spent fuel pool.	3.7.14 Required Action A.1	3.9.11 Action	4
3.7.17 L01	CTS Table 4.7-2 Item 1 requires that the gross activity determination be completed once per 72 hours. ITS 3.7.17 does not require any sampling to be performed to determine the gross activity of the secondary coolant. This changes the CTS by deleting the requirement for gross activity determination.	None	Table 4.7-2 Item 1	5

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.18 L01	CTS 3.7.9 requires a minimum of 18 inches in each steam generator (SG) in MODES 1, 2, 3, and 4. ITS 3.7.18 does not include any minimum SG level requirements. This changes the CTS by deleting the minimum SG level requirements from this Technical Specification.	None	3.7.9	1
3.7.18 L02	CTS 3.7.9 Action states that when SG water level for one or more SGs is outside the limits, be in HOT STANDBY (MODE 3) within 6 hours and COLD SHUTDOWN (MODE 5) within the next 30 hours. No time is provided to restore a SG water level prior to requiring a unit shutdown. Under similar conditions, ITS 3.7.18 ACTION A provides a 15 minute restoration time prior to requiring a unit shutdown. This changes the CTS by providing 15 minutes to restore the SG water level to within limits prior to requiring a unit shutdown. The change in the requirement to be in MODE 5 is discussed in DOC A02.	3.7.18 ACTION A	3.7.9 Action	3
3.8.1 L01	CTS 3.8.1.1 Action a states, in part, with one offsite circuit inoperable perform CTS 4.8.1.1.2.a.4 within 24 hours. CTS 3.8.1.1 Action d states, in part, with two offsite circuits inoperable perform CTS 4.8.1.1.2.a.4 within 8 hours and once per 8 hours thereafter, unless the EDGs are already operating. CTS 4.8.1.1.2.a.4 requires verification that the diesel starts and accelerates up to 900 rpm, preceded by an engine prelube and/or appropriate other warm-up procedure. ITS 3.8.1 ACTIONS A and C do not contain these requirements. This changes the CTS by deleting the requirement to test the diesel when one or both offsite circuits are inoperable.	None	3.8.1.1 Actions a and d	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.1 L02	When an EDG is found inoperable, CTS 3.8.1.1 Action b, requires a demonstration that the remaining EDG is OPERABLE within 24 hours. When an EDG and an offsite circuit are concurrently inoperable, CTS 3.8.1.1 Action c requires a similar demonstration within 8 hours. (Note: The time to perform the EDG test in CTS 3.8.1.1 Action c has been changed to 24 hours as described in DOC L05.) ITS 3.8.1 Required Action B.3.2 includes a requirement to perform SR 3.8.1.2, which requires the verification that the EDG starts from standby conditions and achieves steady state voltage and frequency. In addition, ITS 3.8.1 Required Action B.3.1 has been added and provides the option to determine OPERABLE EDG(s) are not inoperable due to common cause failure. This changes the CTS by providing an allowance to not start an OPERABLE EDG as long as it can be shown that there is no common mode failure.	3.8.1 Required Action B.3.1	3.8.1.1 Actions b and c	4
3.8.1 L03	CTS 4.8.1.1.2.d.2 requires verification of EDG performance following a "simulated safety features actuation system (SFAS) test signal." ITS SR 3.8.1.15 specifies that the signal may be from either an "actual" or simulated (i.e., test) signal. This changes the CTS by explicitly allowing the use of either and actual or simulated signal for the test.	SR 3.8.1.15	4.8.1.1.2.d.2	6

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.1 L04	<p>CTS 3.0.5 allows a system, subsystem, train, component, or device to be considered OPERABLE with an inoperable emergency or normal power source provided its corresponding normal or emergency power source is OPERABLE and its redundant system(s), subsystem(s), train(s), component(s), and device(s) are OPERABLE. CTS 3.0.5 requires a unit shutdown to start within two hours with these requirements not met. CTS 3.0.5 also provides an explicit time period to be in HOT STANDBY (MODE 3), HOT SHUTDOWN (MODE 4), and COLD SHUTDOWN (MODE 5). ITS 3.8.1 ACTION A (one required offsite source inoperable) requires the declaration of required feature(s) with no offsite power available inoperable when its redundant required feature(s) is inoperable. The CT allowed by the Required Action A.2 is 24 hours from discovery of no offsite power to one train concurrent with inoperability of redundant required feature(s). ITS 3.8.1 ACTION B (one required EDG inoperable) requires the declaration of required feature(s) supported by the inoperable EDG inoperable when its required redundant feature(s) is inoperable. The CT allowed by the Required Action B.2 is 4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s). ITS 3.8.1 ACTION C (two required offsite circuits inoperable) requires the declaration of required feature(s) inoperable when its redundant required feature(s) is inoperable. The CT allowed by the Required Action C.1 is 12 hours from discovery of Condition C concurrent with inoperability of redundant required features. This changes the CTS by allowing more time to restore inoperable equipment and replaces the explicit times to be in MODE 3, MODE 4, and MODE 5 with a requirement to declare the affected features inoperable (and thus to take the ACTIONS required by the individual system LCO, including possible shutdown of the unit).</p>	3.8.1 ACTIONS A, B, and C	3.0.5	3

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.1 L05	CTS 3.8.1.1 Action c specifies the compensatory actions for one inoperable offsite circuit and one inoperable DG. The Actions include a requirement to demonstrate the OPERABILITY of the remaining OPERABLE EDG by performing SR 4.8.1.1.2.a.4 within 8 hours. ITS 3.8.1 Required Action B.3.2 allows 24 hours to perform a similar check on the remaining OPERABLE EDG. This changes the CTS by extending the time to perform this check from 8 hours to 24 hours	3.8.1 Required Action B.3.2	3.8.1.1 Action c	3
3.8.1 L06	CTS Table 4.3-2 Functional Unit 4.a requires a CHANNEL FUNCTIONAL TEST of the Sequencer every month. ITS 3.8.1 does not include this CHANNEL FUNCTIONAL TEST; instead ITS SR 3.8.1.6 requires verification that the interval between each sequenced load block is within 10 percent of design interval for each load sequencer. This changes the CTS by not requiring a CHANNEL FUNCTIONAL TEST.	SR 3.8.1.6	Table 4.3-2 Functional Unit 4	6
3.8.1 L07	CTS 4.3-2 Functional Unit 4 requires a CHANNEL CHECK of the sequencer. ITS 3.8.1 does not require a CHANNEL CHECK. This changes the CTS by not requiring a CHANNEL CHECK of the sequencer.	None	Table 4.3-2 Functional Unit 4	5

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.1 L08	<p>CTS 4.8.1.1.1.b and CTS 4.8.1.1.2.d contains a requirement to perform various tests "during shutdown." These tests have been incorporated in ITS SR 3.8.1.9, SR 3.8.1.10, SR 3.8.1.12, SR 3.8.1.13, and SR 3.8.1.15. ITS SR 3.8.1.9, SR 3.8.1.10, SR 3.8.1.12, and SR 3.8.1.13 include a Note which states that the Surveillance (for SR 3.8.1.9, the automatic transfer portion of SR 3.8.1.9.a and all of SR 3.8.1.9.b) shall not normally be performed in MODE 1 or 2. ITS SR 3.8.1.15 includes a Note which states that the Surveillance shall not normally be performed in MODE 1, 2, 3, or 4. The Notes also state that the Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced. The Notes further state that credit may be taken for unplanned events that satisfy the SR. This changes the CTS by allowing the Surveillance to be performed in the operating MODES as long as the associated assessment is performed or provided that it is an unplanned event that satisfies the requirements of the SR.</p>	<p>SR 3.8.1.9 SR 3.8.1.10 SR 3.8.1.12 SR 3.8.1.13 SR 3.8.1.15</p>	<p>4.8.1.1.1.b 4.8.1.1.2.d</p>	10



Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.1 L09	<p>CTS Table 3.3-3 Action 15a requires, with the number of OPERABLE sequencers one less than the minimum number of sequencers OPERABLE per bus, that the inoperable sequencer module be removed within 1 hour. If this action is not accomplished, the shutdown requirements of CTS 3.0.3 would apply. ITS 3.8.1 ACTION G also requires the inoperable sequencer to be removed within 1 hour when one of the two sequencers per bus is inoperable. However, ITS 3.8.1 ACTION H allows the associated EDG to be declared inoperable immediately when the Required Action and associated CT of Condition G are not met. This changes the CTS by allowing the associated EDG to be immediately declared inoperable instead of entering CTS 3.0.3 and shutting down the unit.</p>	<p>3.8.1 ACTION G 3.8.1 ACTION H</p>	<p>Table 3.3-3 Action 15a</p>	<p>4</p>
3.8.1 L10	<p>CTS 4.8.1.1.2.a.3 and CTS 4.8.1.1.2.c.3 require that the fuel transfer pump can be started and that it transfers fuel from the storage system to the day tank. The test Frequency for these Surveillances 31 days and 184 days, respectively. However, as discussed in DOC A05, since the Frequency for CTS 4.8.1.1.2.a.3 is 31 days, the 184 day Frequency for CTS 4.8.1.1.2.c.3 is limited to 31 days. ITS SR 3.8.1.7 requires the verification that the fuel oil transfer system operates to transfer fuel oil from the fuel oil storage tank to the day tank every 92 days. This changes the CTS by changing the test Frequency from 31 days to 92 days.</p>	<p>SR 3.8.1.7</p>	<p>4.8.1.1.2.a.3 4.8.1.1.2.c.3</p>	<p>7</p>

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.1 L11	CTS 4.8.1.1.2.c.4, the quickstart test, requires that each EDG starts from ambient conditions and accelerates to at least 900 rpm in less than or equal to 10 seconds. ITS SR 3.8.1.8, in part, requires each EDG start from standby conditions and achieves voltage $\geq 4031$ V and frequency $\geq 58.8$ Hz in $\leq 10$ seconds. This changes the CTS by decreasing the speed (i.e., frequency) requirement from 900 rpm (60 Hz) to 58.8 Hz.	SR 3.8.1.8	4.8.1.1.2.c.4	6
3.8.2 L01	The CTS 3.8.1.2 Action requires the suspension of certain activities when the required AC Source is inoperable. ITS 3.8.2 provides an alternate Required Action (ITS 3.8.2 Required Action A.1) that allows the declaration of affected required feature(s) with no offsite power available inoperable instead of requiring the specified activities to be suspended. This changes the CTS by allowing the affected required feature(s) with no offsite power available to be declared inoperable instead of suspending the specified activities.	3.8.2 Required Action A.1	3.8.1.2 Action	4
3.8.2 L02	The CTS 3.8.1.2 Action specifies the compensatory action for an inoperable required AC Source. One of the compensatory actions is the suspension of CORE ALTERATIONS. Under similar conditions, ITS 3.8.2 does not require suspension of CORE ALTERATIONS. This changes the CTS by deleting the requirement to suspend CORE ALTERATIONS when a required AC source is inoperable.	None	3.8.1.2 Action	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.2 L03	The CTS 3.8.1.2 Action specifies the compensatory action for an inoperable required AC Source. One of the compensatory actions is the suspension of positive reactivity "changes." ITS 3.8.2 Required Action A.2.2 (for an inoperable required offsite circuit) and Required Action B.2 (for an inoperable required DG) require the immediate suspension of operations involving positive reactivity "additions that could result in loss of required SDM or boron concentration." This changes the CTS compensatory actions by allowing positive reactivity changes as long as SDM and boron concentration limitations are met.	3.8.2 Required Actions A.2.2 and B.2	3.8.1.2 Action	4
3.8.2 L04	CTS 4.8.1.2 requires the AC electrical power sources to be demonstrated OPERABLE by the performance of each of the SRs of 4.8.1.1.1 and 4.8.1.1.2 except for requirements 4.8.1.1.1.b, 4.8.1.1.2.a.5, 4.8.1.1.2.a.7, 4.8.1.1.2.c.5, 4.8.1.1.2.c.7, and 4.8.1.1.2.d.2. ITS SR 3.8.2.1 has included a similar allowance in the Note to SR 3.8.2.1. However, additional ITS SRs are exempt from being required to be performed. ITS SR 3.8.2.1 states the following SRs are not required to be performed: SR 3.8.1.3, SR 3.8.1.10, SR 3.8.1.11, SR 3.8.1.12, SR 3.8.1.13, and SR 3.8.1.14. This changes the CTS by not requiring the performance of CTS 4.8.1.1.2.d.1 (ITS SR 3.8.1.10) and CTS 4.8.1.1.2.d.3 (ITS SR 3.8.1.13).	SR 3.8.2.1	4.8.1.2	7

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.2 L05	CTS 4.8.1.2 requires the AC electrical power sources to be demonstrated OPERABLE by the performance of each of the SRs of 4.8.1.1.1 and 4.8.1.1.2 except for requirements 4.8.1.1.1.b, 4.8.1.1.2.a.5, 4.8.1.1.2.a.7, 4.8.1.1.2.c.5, 4.8.1.1.2.c.7, and 4.8.1.1.2.d.2. ITS SR 3.8.2.1 has included a similar allowance in the Note to SR 3.8.2.1. However, the ITS is exempting SRs from being required to be met, not just exempting them from being performed. ITS SR 3.8.2.1 states the following SRs are not required to be met: SR 3.8.1.6, SR 3.8.1.9, and SR 3.8.1.15. This changes the CTS by not requiring CTS 4.8.1.1.1.b (ITS SR 3.8.1.9), CTS 4.8.1.1.2.a.7 and 4.8.1.1.2.c.7 (ITS SR 3.8.1.6), and CTS 4.8.1.1.2.d.2, including parts (a) and (b) (ITS SR 3.8.1.15) to be met.	SR 3.8.2.1	4.8.1.2	5

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.3 L01	<p>The CTS 3.8.1.1 and CTS 3.8.1.2 Actions do not provide explicit compensatory actions if the volume of fuel oil in the storage tank is less than the specified limit. Thus if the minimum indicated volume is not met, the associated EDG must be declared inoperable and CTS 3.8.1.1 Action b or the CTS 3.8.1.2 Action must be entered, as applicable. ITS 3.8.3 ACTION A allows the unit to not declare the associated EDG inoperable as long as the volume of stored fuel oil is greater than a six day limit (i.e., &gt; 26, 800 gallons). In this situation, ITS 3.8.3 Required Action A.1 allows 48 hours to restore the fuel oil volume to within limits. If this Required Action and associated CT are not met or if the EDG fuel oil storage tank volume is <math>\leq</math> 26,800 gallons, the associated EDG must be declared inoperable immediately (ITS 3.8.3 ACTION F). In addition, a Note has been added to the ITS 3.8.3 ACTIONS that allows separate Condition entry for each EDG. This changes the CTS by allowing each EDG not to be declared inoperable with the fuel oil storage tank volume not within the specified Surveillance limit as long as each EDG has enough fuel oil for 6 days (&gt; 26, 800 gallons) of operation at full load.</p>	<p>3.8.3 ACTIONS Note 3.8.3 ACTIONS A and F</p>	<p>3.8.1.1 Action b 3.8.1.2 Action</p>	<p>4</p>

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.4 L01	CTS 3.8.2.3 Action b states, in part, that with only one charger of one MCC OPERABLE, restore the inoperable charger to OPERABLE status within 2 hours. ITS 3.8.4 ACTION A has been added and covers the condition of one or two Train 1 or Train 2 battery chargers inoperable. ITS 3.8.4 Required Action A.1 requires the restoration of the battery terminal voltage to greater than or equal to the minimum established float voltage within 2 hours. ITS 3.8.4 Required Action A.2 requires the verification that the battery float current is $\leq 2$ amps once per 12 hours and ITS 3.8.4 Required Action A.3 requires the restoration of the battery charger to OPERABLE status within 72 hours. This changes the CTS by extending the time one or two battery chargers in one train may be inoperable.	3.8.4 ACTION A	3.8.2.3 Action b	4
3.8.4 L02	CTS 3.8.2.3 Action b states that one of the required 125 ventilation duct chase (VDC) batteries or chargers for an MCC may be inoperable and provides 2 hours for the inoperable battery or charger to be restored to OPERABLE status. ITS 3.8.4 ACTION B provides the actions for one direct current (DC) electrical power source inoperable for reasons other than those covered by ITS 3.8.4 ACTION A. Thus ITS 3.8.4 ACTION B covers one or two batteries inoperable in one train and covers both batteries and chargers in one train concurrently inoperable. The required DC electrical power source must be restored to OPERABLE status within 2 hours. This changes the CTS by allowing more than one battery or charger in the same train to be inoperable concurrently.	3.8.4 ACTION B	3.8.2.3 Action b	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.4 L03	CTS 4.8.2.3.2.c requires that the battery charger supply 475 amperes at a minimum of 130 volts for at least 8 hours. ITS SR 3.8.4.2 requires the verification that each battery charger will supply $\geq 475$ amps at greater than or equal to the minimum established float voltage for $\geq 8$ hours. This changes the CTS by deleting the actual value for the minimum voltage for the test.	SR 3.8.4.2	4.8.2.3.2.c	6
3.8.4 L04	CTS 4.8.2.3.2.c provides a test for the 125 V battery chargers. ITS SR 3.8.4.2 includes a similar test. In addition, the SR provides an alternative test method. This method requires a verification that each required battery charger can recharge the battery to the fully charged state within 12 hours while supplying the largest combined demands of the various continuous steady state loads, after a battery discharge to the bounding design basis event discharge state. This changes the CTS by allowing an alternate test that is not currently allowed.	SR 3.8.4.2	4.8.2.3.2.c	6
3.8.4 L05	CTS 4.8.2.3.2.d contains a requirement to perform the battery capacity test "during shutdown." ITS SR 3.8.4.3 requires a similar Surveillance, and includes a Note that states the Surveillance shall not be performed in MODE 1, 2, 3, or 4. The Note also states that credit may be taken for unplanned events that satisfy the SR. This changes the CTS by allowing the Surveillance to be performed in the operating MODES, provided that it is an unplanned event that satisfies the requirements of the SR.	SR 3.8.4.3	4.8.2.3.2.d	10

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.4 L05	CTS 4.8.2.3.2 d requires verification of the station battery capacity when the battery is subjected to a service test. The CTS allows substitution of a modified performance discharge test for this service test once per 60 months. ITS SR 3.8.4.3 requires a similar battery capacity test. The SR is modified by Note 1, which allows the modified performance discharge test in SR 3.8.6.6 to be performed in lieu of the service test in SR 3.8.4.3. This changes the CTS by allowing a modified performance discharge test to be substituted for a service test all the time, instead of the current once per 60 months.	SR 3.8.4.3	4.8.2.3.2.d	6
3.8.5 L01	With less than the minimum complement of DC sources OPERABLE, CTS 3.8.2.4 Action requires the establishment of containment integrity within 8 hours. ITS 3.8.5 ACTION A requires suspending movement of irradiated fuel assemblies, suspending operations involving a positive reactivity addition that could result in the loss of required SDM or boron concentration, and the initiation of actions to restore the required DC electrical power source to OPERABLE status. This changes the CTS by replacing the existing Required Action to restore containment integrity.	3.8.5 ACTION A	3.8.2.4 Action	4
3.8.5 L02	CTS 4.8.2.4.2 requires the demonstration of the OPERABILITY of the 125 VDC battery banks and chargers in accordance with the SRs of CTS 4.8.2.3.2. ITS SR 3.8.5.1 requires SR 3.8.4.1, SR 3.8.4.2, and SR 3.8.4.3 to be applicable. However, a Note has been added that states ITS SR 3.8.4.3 does not have to be performed. This changes the CTS by allowing a certain SR not to be performed. Changes to the Surveillances of CTS 4.8.2.3.2 are discussed in the Discussion of Changes for ITS 3.8.4, "DC Sources - Operating."	SR 3.8.5.1	4.8.2.4.2	7



Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.6 L01	CTS 4.8.2.3.2.a.1 requires the verification that the pilot cell voltage is greater than or equal to the specified limit every 7 days. ITS SR 3.8.6.2 requires the verification of each pilot battery cell voltage every 31 days. This changes the CTS by extending the Surveillance interval for verification of pilot cell voltage from 7 days to 31 days.	SR 3.8.6.2	4.8.2.3.2.a.1	7
3.8.6 L02	CTS 4.8.2.3.2.b, in part, requires the performance of several Surveillances within 7 days after a battery discharge (battery terminal voltage below 110 volts), or battery overcharge (battery terminal voltage above 150 volts). ITS 3.8.6 does not require these Surveillances to be performed after a battery discharge or overcharge. This changes the CTS by not including a specific SR to perform these tests after a discharge or overcharge.	None	4.8.2.3.2.b	7
3.8.6 L03	CTS 4.8.2.3.2.b.2 requires verification that there is no visible corrosion at either terminals or connectors, or the connection resistance of these items is less than $150 \times 10^{-6}$ ohms. CTS 4.8.2.3.2.c, in part, requires verification that the cells, cell plates and battery racks show no visual indication of physical damage or abnormal deterioration, the cell-to-cell and terminal connections are clean, tight and coated with anti-corrosion material, and the resistance of each cell-to-cell and terminal connection is less than or equal to $150 \times 10^{-6}$ ohms. ITS 3.8.6 does not include these requirements for battery inspections, the removal of visible corrosion, and the verification that the cell-to-cell and terminal connections are clean, tight, and coated with anti-corrosion material. This changes the CTS by deleting the explicit battery requirements from the Technical Specifications (TSs).	None	4.8.2.3.2.b.2	5

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.6 L04	CTS 4.8.2.3.2.b.3 requires the average electrolyte temperature of every sixth connected cell to be verified within limit. ITS SR 3.8.6.4 requires verification that each pilot cell temperature is within limits. This changes the CTS by monitoring the pilot cells instead of the every sixth connected cell.	SR 3.8.6.4	4.8.2.3.2.b.3	6
3.8.6 L05	CTS 4.8.2.3.2.a.1 requires verification that the electrolyte level of each pilot cell is greater than the minimum level indication mark and $\leq 1/4$ inch above the maximum level indication mark every 7 days. ITS 3.8.6 does not include this requirement. This changes the CTS by deleting the requirement to monitor pilot cell electrolyte level every 7 days.	None	4.8.2.3.2.a.1	5
3.8.6 L06	CTS 4.8.2.3.2.a.1 requires the verification that the pilot cell specific gravity is within limit (the Category A limits of Table 4.8-1 as modified by footnote (c)) and CTS 4.8.2.3.2.b.1 requires the verification that the connected cell specific gravity is within limit (the Category B limits of Table 4.8-1). As indicated in Table 4.8-1 (footnote (a)) the specific gravity limit must be corrected for electrolyte temperature and level. ITS 3.8.6 does not include these Surveillances. This changes the CTS by deleting these Surveillances.	None	4.8.2.3.2.a.1 4.8.2.3.2.b.1	5

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.6 L07	<p>The Category A limits in Table 4.8-1 for the pilot cell voltage is <math>\geq 2.13</math> V. The Category B limits in Table 4.8-1 for each connected cell voltage is <math>\geq 2.13</math> V corrected for average electrolyte temperature and the Allowable Value for each connected cell voltage is <math>&gt; 2.07</math> V. ITS SR 3.8.6.2 requires the verification of each pilot cell voltage is <math>&gt; 2.07</math> V and ITS SR 3.8.6.5 requires the verification that each battery connected cell voltage is <math>&gt; 2.07</math> V. This changes the CTS by reducing the acceptance criteria for pilot cell and battery connected cell voltage limits from <math>\geq 2.13</math> V to <math>&gt; 2.07</math> V.</p>	SR 3.8.6.2 SR 3.8.6.5	Table 4.8-1 Categories A and B voltage limits	6
3.8.6 L08	<p>The Categories A and B electrolyte level limit in Table 4.8-1 for each pilot cell and each connected cell is <math>&gt;</math> minimum level indication mark, and <math>\leq 1/4</math> inch above maximum level indication mark. Footnote (d) to the Table states it is acceptable for the electrolyte level to temporarily increase above the specified maximum during equalizing charges provided it is not overflowing. In addition, the Category B electrolyte level Allowable Value for each connected cell (which includes the pilot cells) is above the top of plates, and not overflowing. ITS SR 3.8.6.3 requires the verification that the electrolyte level for each connected cell is greater than or equal to minimum established design limits. This changes the CTS by deleting the specific value for the lower electrolyte level limit and deletes the upper electrolyte level limit requirement.</p>	SR 3.8.6.3	Table 4.8-1 Categories A and B electrolyte level limits, including footnote d	6

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.6 L09	<p>CTS Table 4.8-1 Footnote (1) specifies compensatory actions for when Category A parameters are not within limit. The compensatory action allows the battery to be considered OPERABLE as long as all Category B measurements are taken and found to be within their allowable values, and provided all parameter(s) are restored to within limits within the next 6 days.</p> <p>CTS Table 4.8-1 Footnote (2) specifies compensatory actions for when Category B parameters are not within limit. The compensatory action allows the battery to be considered OPERABLE provided that they are within their allowable values and provided the parameter(s) are restored to within limits within 7 days.</p> <p>CTS Table 4.8-1 Footnote (3) states that any Category B parameter not within its allowable value indicates an inoperable battery. In lieu of immediately declaring the associated battery inoperable, the ITS 3.8.6 ACTIONS provide compensatory actions for when battery parameters are not within limits that may be taken prior to declaring the associated battery inoperable. This changes the CTS by adding compensatory actions specifically designed for battery parameters.</p>	3.8.6 ACTIONS A, B, C, D, E, and F	Table 4.8-1 Footnotes (1), (2), and (3)	4
3.8.6 L10	<p>CTS 4.8.2.3.2.e.1, 4.8.2.3.2.e.2, and 4.8.2.3.2.e.3 contain a requirement to perform the battery performance discharge or modified performance discharge test “during shutdown.” ITS SR 3.8.6.6 requires a similar test, and includes a Note that states the Surveillance shall not be performed in MODE 1, 2, 3, or 4. The Note also states that credit may be taken for unplanned events that satisfy this SR. This changes the CTS by allowing the Surveillances to be performed in the operating MODES, provided that it is an unplanned event that satisfies the requirements of the SR.</p>	SR 3.8.6.6	4.8.2.3.2.e.1, 4.8.2.3.2.e.2, 4.8.2.3.2.e.3	10

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.10 L01	With less than the minimum complement of AC busses OPERABLE and energized, CTS 3.8.2.2 requires the establishment of containment integrity within 8 hours. With less than the minimum complement of DC buses OPERABLE and energized, CTS 3.8.2.4 also requires the establishment of containment integrity within 8 hours. ITS 3.8.10 ACTION A requires suspending movement of irradiated fuel assemblies, suspension of operations involving a positive reactivity additions that could result in the loss of required SDM or boron concentration, the initiation of actions to restore required AC, DC, and AC vital bus electrical power distribution subsystems to OPERABLE status, and the declaration of the associated required DHR subsystems inoperable and not in operation. This changes the CTS by replacing the existing Required Action to restore containment integrity.	3.8.10 ACTION A	3.8.2.2 Action 3.8.2.4 Action	4
3.9.1 L01	CTS 3.9.1 provides limits on the boron concentration of all filled portions of the RCS and the refueling canal when in MODE 6. ITS 3.9.1 modifies this requirement with a Note that states "Only applicable to the refueling canal when connected to the RCS." This changes the CTS by eliminating the applicability of the boron concentration limits on the refueling canal when those volumes are not connected to the RCS.	3.9.1 Applicability	3.9.1	2
3.9.1 L02	The CTS 3.9.1 Action specifies the compensatory action for when the boron concentration requirement is not met. One of the compensatory actions is to suspend CORE ALTERATIONS. Under similar conditions, ITS 3.9.1 does not require suspension of CORE ALTERATIONS. This changes the CTS by deleting the requirement to suspend CORE ALTERATIONS when the boron concentration requirement is not met.	None	3.9.1 Action	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.1 L03	CTS 3.9.1 Action states that when the boron concentration requirement is not met, initiate and continue boration of $\geq 12$ gpm of 7875 ppm boric acid solution or its equivalent until keff is reduced to $\leq 0.95$ . ITS 3.9.1 Required Action A.2 requires initiation of action to restore boron concentration to within limit, but does not include the boric acid concentration or flow rate requirements of the borated water being added. This changes the CTS by eliminating the specific requirements for the boric acid solution concentration and flow rate to be used to restore compliance with the LCO.	3.9.1 Required Action A.2	3.9.1 Action	4
3.9.1 L04	CTS 4.9.1.1 requires the LCO reactivity condition to be determined prior to removing or unbolting the reactor vessel head, and prior to withdrawal of any safety or regulating rod in excess of 3 feet from its fully inserted position within the reactor pressure vessel. ITS 3.9.1 does not contain this SR. This changes the CTS by deleting this specific SR.	None	4.9.1.1	5
3.9.2 L01	CTS 3.9.2 Action a specifies the compensatory action for when a source range neutron flux monitor is inoperable. One of the compensatory actions (CTS 3.9.2 Action a.1) is to suspend CORE ALTERATIONS. Under similar conditions, ITS 3.9.2 Required Action A.1 requires suspension of positive reactivity additions, except the introduction of coolant into the RCS, instead of suspension of CORE ALTERATIONS. This changes the CTS by changing the requirement to suspend CORE ALTERATIONS to only require suspension of positive reactivity additions, not covered by CTS 3.9.2 Action a.2, when a source range neutron flux monitor is inoperable.	3.9.2 Required Action A.1	3.9.2 Action a	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.2 L02	CTS LCO 3.9.2 requires that two source range neutron flux monitors, one from each side of the reactor core, be OPERABLE. ITS LCO 3.9.2 requires two source range neutron flux monitors to be OPERABLE. This changes the CTS by eliminating the requirement that the neutron monitors are on each side of the reactor core.	3.9.2	3.9.2	1
3.9.4 L01	CTS 3.9.8.1 Action a states, in part, that with less than one DHR loop in operation, close all containment penetrations providing direct access from the containment atmosphere to the outside atmosphere within 4 hours. ITS 3.9.4 Required Actions A.4, A.5, and A.6 state that with the DHR loop requirements not met, within 4 hours close and secure the equipment hatch with at least four bolts, close one door in each air lock, and verify each penetration providing direct access from the containment atmosphere to the outside atmosphere is either closed with a manual or automatic isolation valve, blind flange, or equivalent, or is capable of being closed by a Containment Purge and Exhaust System. This changes the CTS Actions by allowing penetrations capable of being closed by a Containment Purge and Exhaust System to remain open when the DHR requirements are not met.	3.9.4 Required Actions A.4, A.5, and A.6	3.9.8.1 Action a	4
3.9.5 L01	ITS 3.9.5 is modified by LCO Note 2, which allows one required DHR loop to be inoperable for up to 2 hours for Surveillance testing, provided that the other loop is OPERABLE and in operation. CTS 3.9.8.2 does not contain this allowance. This changes the CTS by allowing the LCO to not be met under certain situations.	LCO 3.9.5 Note 2	None	1

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.5 L02	CTS 4.9.8.2 requires verification that the inactive DHR loop is OPERABLE per Specification 4.0.5. ITS 3.9.5 does not contain this Surveillance. This changes the CTS by deleting this specific Surveillance.	None	4.9.8.2	5
3.9.5 L03	CTS 4.9.8.1 verifies that the DHR loop is in operation and circulating RC and provides two flow rate requirements. CTS 4.9.8.1.a requires $\geq 2800$ gpm when a reduction in boron concentration is in progress and CTS 4.9.8.1.b requires a flow rate sufficient to maintain core outlet temperature $\leq 140^{\circ}\text{F}$ when a reduction in boron concentration is not in progress. ITS SR 3.9.5.1 requires a similar Surveillance, but does not include a specific flow rate requirement. This changes the CTS by deleting the DHR loop flow rate requirement	SR 3.9.5.1	4.9.8.1 4.9.8.1.a 4.9.8.1.b	6



Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.6 L01	<p>CTS 3.9.10 states that at least 23 feet of water shall be maintained over the top of irradiated fuel assemblies seated within the reactor pressure vessel during movement of fuel assemblies or CR s within the reactor pressure vessel while in MODE 6. The CTS 3.9.10 Action requires suspension of movement of fuel assemblies or CR s within the pressure vessel if the water level requirement is not met. ITS 3.9.6 states the refueling canal water level shall be maintained <math>\geq 23</math> feet above the top of the reactor vessel flange during movement of irradiated fuel assemblies within containment. ITS 3.9.6 Required Action A.1 requires the suspension of movement of irradiated fuel assemblies within containment. This changes the CTS by restricting the Applicability and ACTIONS from movement of any "fuel assemblies" within the reactor pressure vessel to movement of "irradiated fuel assemblies" within containment. The change eliminating MODE 6 is discussed in DOC A02. The change from within "the reactor pressure vessel" to within "containment" is discussed in DOC M02. The change eliminating CR s is discussed in DOC L02.</p>	<p>3.9.6 Applicability 3.9.6 Required Action A.1</p>	<p>3.9.10 Applicability 3.9.10 Action</p>	2

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.6 L02	<p>CTS 3.9.10 states that at least 23 feet of water shall be maintained over the top of irradiated fuel assemblies seated within the reactor pressure vessel during movement of fuel assemblies or CR s within the reactor pressure vessel while in MODE 6. The CTS 3.9.10 Action requires suspension of movement of fuel assemblies or CR s within the pressure vessel if the water level requirement is not met. CTS 4.9.10 requires a determination of the water level during the movement of fuel assemblies or CR s. ITS 3.9.6 states the refueling canal water level shall be maintained <math>\geq 23</math> feet above the top of the reactor vessel flange during movement of irradiated fuel assemblies within containment. This changes the CTS by deleting the requirement that the LCO, ACTIONS, and Surveillance are applicable during CR movement. The change to "irradiated fuel assemblies" from "fuel assemblies" is discussed in DOC L01. The change eliminating MODE 6 is discussed in DOC A02. The change from within "the reactor pressure vessel" to within "containment" is discussed in DOC M02.</p>	3.9.6 Applicability	3.9.10 Applicability 3.9.10 Action 4.9.10	2
3.9.6 L03	<p>CTS 4.9.10 requires the refueling cavity water level to be determined to be within limit "within 2 hours prior to the start of" and at least once per 24 hours thereafter during movement of fuel assemblies or CR s within the reactor pressure vessel. ITS SR 3.9.6.1 requires verification that the refueling canal water level is within limit every 24 hours. This changes the CTS by reducing the Frequency for verifying water level from 2 hours before entering the Applicability of the LCO to 24 hours before entering the Applicability of the LCO.</p>	SR 3.9.6.1	4.9.10	7

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3/4.9.4 L01	<p>CTS 3.9.4 is applicable during CORE ALTERATIONS and movement of irradiated fuel within the containment. CTS 3.9.4.a allows the equipment hatch to be open provided the requirements of CTS 3.9.12 (the Spent Fuel Pool Area EVS) are satisfied and CTS 3.9.4.b allows both airlock doors to be opened under certain provisions. CTS 3.9.4.c provides the requirements for containment penetrations and requires either the penetrations to be isolated by a manual or automatic valve, blind flange, or equivalent, or to be capable of being closed by an OPERABLE containment purge and exhaust valve upon receipt of a high radiation signal. Furthermore, as described in DOC A01, a new Note is proposed to be added to the CTS by another License Amendment request. The proposed Note allows penetration flow paths providing direct access from the containment atmosphere to the outside atmosphere to be unisolated under ACs. The ITS does not include this Technical Specification. This changes the CTS by eliminating requirements for Containment Penetrations during CORE ALTERATIONS and when moving irradiated fuel assemblies.</p>	None	3/4.9.4	1
5.5 L01	<p>CTS 4.8.1.1.2.b requires verifying every 92 days that a sample of diesel fuel from the fuel oil storage tank is within the acceptable limits specified in Table 1 of ASTM D975-68 when checked for viscosity, water, and sediment. ITS 5.5.12.c only requires total particulate concentration of the stored fuel oil to be tested every 31 days. This changes the CTS by deleting the quarterly viscosity, water, and sediment checks of stored fuel oil.</p>	None	4.8.1.1.2.b	5

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.6 L01	CTS 6.9.1.4 requires the annual reports of CTS 6.9.1.5 to be submitted prior to March 31 of each year. CTS 6.9.1.5.c requires annual reporting of information regarding any instances when the specific activity limit of Specification 3.4.8 is exceeded. ITS 5.6 does not contain any requirements for such a report. This changes the CTS by not including the requirements for the annual reporting of instances when the Technical Specification specific activity limit for the primary coolant is exceeded.	None	6.9.1.4 6.9.1.5.c	8
5.6 L02	CTS 6.9.1.10 requires the Annual Radiological Environmental Operating Report to be submitted before May 1 of each year. ITS 5.6.1 requires the Annual Radiological Environmental Operating Report to be submitted by May 15 of each year. This changes the CTS by allowing additional time to submit this report each year.	5.6.1	6.9.1.10	1
5.6 L03	CTS 3/4.4.9.1 provides the requirements for the RCS Pressure/Temperature (P/T) Limits. ITS 3.4.3, "RCS Pressure and Temperature (P/T) Limits," Discussion of Change LA02 describes that the specific P/T limits, including the P/T limit curves and the maximum heatup and cooldown rates, are being relocated to the PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR). ITS 5.6.4 provides the requirements for the PTLR. This changes the CTS by adding a PTLR to the TSs.	5.6.4	3/4.4.9.1	1

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.7 L01	<p>CTS 6.12.1.d.4 states that each individual that enters a high radiation area with dose rates not exceeding 1.0 rem/hour at 30 centimeters from the radiation source or from any surface penetrated by the radiation shall possess a self-reading dosimeter and be under the surveillance, as specified in the RWP or equivalent, while in the area, by means of closed circuit television, by personnel qualified in radiation protection procedures responsible for controlling personnel radiation exposure in the area.</p> <p>ITS 5.7.1.d.4.(ii) retains this same requirement. However, ITS 5.7.1.d.4.(i) provides an additional option in lieu of that required by CTS 6.12.1.d.4. ITS 5.7.1.d.4.(i) states that each individual that enters a high radiation area with dose rates not exceeding 1.0 rem/hour at 30 centimeters from the radiation source or from any surface penetrated by the radiation shall possess a self-reading dosimeter and be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area. This changes the CTS by allowing an individual to be monitored directly instead of indirectly (i.e., by closed circuit television) when entering a high radiation area with dose rates not exceeding 1.0 rem/hour at 30 centimeters from the radiation source or from any surface penetrated by the radiation.</p>	5.7.1.d.4.(i)	6.12.1.d.4	1
5.7 L02	<p>CTS 6.12.1.e states that except for individuals qualified in radiation protection procedures, entry into such areas (a high radiation area with dose rates not exceeding 1.0 rem/hour at 30 centimeters from the radiation source or from any surface penetrated by the radiation) shall be made only after dose rates in the area have been</p>	5.7.1.e 5.7.2.e	6.12.1.e 6.12.2.e	1

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	<p>determined and entry personnel are knowledgeable of them.  CTS 6.12.2.e states that except for individuals qualified in radiation protection procedures, entry into such areas (a locked high radiation area with dose rates exceeding 1.0 rem/hour at 30 centimeters from the radiation source or from any surface penetrated by the radiation) shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them.  ITS 5.7.1.e states that except for individuals qualified in radiation protection procedures, "or personnel continuously escorted by such individuals," entry into such areas (a high radiation area with dose rates not exceeding 1.0 rem/hour at 30 centimeters from the radiation source or from any surface penetrated by the radiation) shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them.  Furthermore, ITS 5.7.1.e requires that these continuously escorted personnel will receive a pre-job briefing prior to entry into such areas, and that this dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.  ITS 5.7.2.e provides identical requirements for entry into a high radiation area with dose rates greater than 1.0 rem/hour at 30 centimeters from the radiation source or from any surface penetrated by the radiation, but less than 500rads/hours at 1 Meter from the radiation source or from any surface penetrated by the radiation. This changes the CTS by allowing additional personnel to enter high radiation areas prior to determining the current dose rates.</p>			

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.7 L03	CTS 6.12.2 requires high radiation areas with dose rates greater than 1.0 rem/hour at 30 centimeters from the radiation source or from any surface penetrated by the radiation, but less than 500 rads/hours at 1 meter from the radiation source or from any surface penetrated by the radiation shall be locked and CTS 6.12.2.a states that the areas will be locked by a door, gate, or other barrier. ITS 5.7.2.a allows the areas to either be locked or continuously guarded by a door, gate, or other barrier. This changes the CTS by allowing the doors, gates, or other barriers to be guarded instead of being locked.	5.7.2.a	6.12.2.a	1

Change Categories:

Category 1 – Relaxation of LCO Requirements

Category 2 – Relaxation of Applicability

Category 3 – Relaxation of Completion Time

Category 4 – Relaxation of Required Action

Category 5 – Deletion of Surveillance Requirement

Category 6 – Relaxation of Surveillance Requirement Acceptance Criteria

Category 7 – Relaxation of Surveillance Frequency - Non-24 Month Type Change

Category 8 – Deletion of Reporting Requirements

Category 9 – Addition of LCO 3.0.4 Exception

Category 10 – Deletion of Surveillance Requirement Shutdown Performance Requirements