Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	1.0	1.0
1.0 A02	CTS 1.0 states that "The following terms are defined for uniform interpretation of the specifications." The Note for ITS Section 1.1 states "The defined terms of this section appear in capitalized type and are applicable throughout these Technical Specifications and Bases." This changes the CTS by replacing the CTS 1.0 statement with a Note and adds a clarification phrase that the defined terms also apply to the Bases.	1.1	1.0
1.0 A03	CTS Section 1.0 includes the following definitions: • SAFETY LIMITS; • LIMITING SAFETY SYSTEM SETTINGS; • LIMITING CONDITIONS FOR OPERATION; • OPERATING; • CONTAINMENT SYSTEM INTEGRITY; • PROTECTION SYSTEM CHANNEL; • LOGIC CHANNEL; • DEGREE OF REDUNDANCY; • PROTECTION SYSTEM; • SOURCE CHECK; • REACTOR CRITICAL; • REFUELING OPERATION; • REPORTABLE EVENT; • MEMBER(S) OF THE PUBLIC; • SITE BOUNDARY; and • UNRESTRICTED AREA. The ITS does not use this terminology and the ITS Section 1.1 does not contain these terms in the ITS.	1.1	1.0

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A04	The CTS 1.0.e definition of OPERABLE-OPERABILITY requires a system or component to be capable of performing its "intended" function and all necessary support systems to also be capable of performing their "intended" function. The ITS Section 1.1 definition of OPERABLE-OPERABILITY requires the system, subsystem, train, component, or device to be capable of performing the "specified safety" function(s), and requires all necessary support systems that are required for the system, subsystem, train, component, or device to perform its "specified safety" function(s) to also be capable of performing their related support functions. This changes the CTS by altering the requirements to be able to perform "intended" functions to a requirement to be able to perform "specified safety" functions.	1.1	1.0
1.0 A05	The CTS 1.0.e definition of OPERABLE-OPERABILITY requires that all necessary normal and emergency electrical power sources be capable of performing their related support function for the system or component to be OPERABLE. The ITS Section 1.1 definition of OPERABLE-OPERABILITY will replace the phrase "normal and emergency electrical power sources" with "normal or emergency electrical power." This changes the CTS definition of OPERABLE-OPERABILITY by allowing a device to be considered OPERABLE with either normal or emergency power capable of performing their related support function.	1.1	1.0.e

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A06	CTS 1.0.i.2 defines a CHANNEL FUNCTIONAL TEST as "injecting a simulated signal into the channel as close to the primary sensor as practicable to verify that it is OPERABLE, including alarm and/or trip initiating action." ITS Section 1.1 renames the definition to CHANNEL OPERATIONAL TEST (COT), and defines it as "the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify OPERABILITY of all devices in the channel required for channel OPERABILITY. The COT shall include adjustments, as necessary, of the required alarm, interlock, and trip setpoints required for channel OPERABILITY such that the setpoints are within the necessary range and accuracy. The COT may be performed by means of any series of sequential, overlapping, or total channel steps." The addition of use of an actual signal is discussed in DOC L01. This changes the CTS by stating that the COT shall include adjustments, as necessary, of the devices in the channel so that the setpoints are within the required range and accuracy, changes the example list of devices contained in the definition, and states that the test may be performed by means of any series of sequential, overlapping, or total channel steps. • The CTS definition states that the CHANNEL FUNCTIONAL TEST shall verify that the channel is OPERABLE "including alarm and/or trip initiating action." The ITS states that the COT shall verify OPERABILITY of "all devices in the channel required for channel OPERABILITY." • The ITS states "The COT shall include adjustments, as necessary, of the required alarm, interlock, and trip setpoints required for channel OPERABILITY such that the setpoints are within the necessary range and accuracy." The ITS states "The COT may be performed by means of any series of sequential, overlapping, or total channel steps."	1.1	1.0.i.2

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A07	CTS 1.0.i.3 defines a CHANNEL CALIBRATION as "the adjustment of channel output as necessary, such that it responds with acceptable range and accuracy to known values of the parameter that the channel monitors. Calibration shall encompass the entire channel, including alarm and/or trip, and shall be deemed to include the CHANNEL FUNCTIONAL TEST." ITS defines a CHANNEL CALIBRATION as "the adjustment, as necessary, of the channel output such that it responds within the necessary range and accuracy to known values of the parameter that the channel monitors. The CHANNEL CALIBRATION shall encompass all devices in the channel required for channel OPERABILITY. Calibration of instrument channels with resistance temperature detector (RTD) thermocouple sensors may consist of an inplace qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel. The CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping, or total channel steps." This results in a number of changes to the CTS. • The CTS definition states, "calibration shall encompass the entire channel, including alarm and/or trip." The ITS states, "The CHANNEL CALIBRATION shall encompass all devices in the channel required for channel OPERABILITY." • The CTS states that the CHANNEL CALIBRATION "shall be deemed to include the CHANNEL FUNCTIONAL TEST." The ITS does not include this statement. • The ITS adds the statement, "Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an inplace qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel." The purpose of a CHANNEL CALIBRATION is to adjust the channel output so that the channel responds within the necessary range and accuracy to known values of the parameters that the channel monitors.	1.1	1.0.i.3

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A08	CTS 1.0.j describes operating conditions as REFUELING, COLD SHUTDOWN, INTERMEDIATE SHUTDOWN, HOT SHUTDOWN, HOT STANDBY, and OPERATING. ITS defines the reactor operating conditions in Table 1.1-1 as MODE 1 (Power Operation), MODE 2 (Startup), MODE 3 (Hot Standby), MODE 4 (Hot Shutdown), MODE 5 (Cold Shutdown), and MODE 6 (Refueling). This changes the CTS by reformatting the definitions and names for reactor operating conditions. Other changes associated with adopting the ITS MODES are discussed in DOCs A09, M01, and LA01.	1.1 Table 1.1-1	1.0.j
1.0 A09	CTS 1.0.j, MODES, is revised. The corresponding table in ITS Section 1.1 is Table 1.1-1, MODES. The changes to the CTS are as follows: • The CTS 1.0.j condition "REACTIVITY" is expressed in units of $\Delta k/k$. ITS Table 1.1-1 Reactivity Condition is expressed in units of k_{eff}. • The CTS 1.0.j Coolant Temp for HOT STANDBY and OPERATING is changed from ~T_{oper} to "NA" (not applicable) in ITS Table 1.1-1. • The CTS 1.0.j, REFUELING limit on Coolant Temp ($\leq$ 140°F) is removed. In ITS Table 1.1-1, the MODE 6 average reactor coolant temperature limit is specified as "NA" (not applicable). • CTS 1.0.j Reactivity condition for INTERMEDIATE SHUTDOWN and HOT SHUTDOWN (as shown in Note 1) is having the required SHUTDOWN MARGIN as specified in the Core Operating Limits Report (COLR). ITS Table 1.1-1 requires the Reactivity Condition of MODES 3 and 4 to be k_{eff} <0.99. • The Fission Power % in CTS 1.0.j for REFUELING, COLD SHUTDOWN, INTERMEDIATE SHUTDOWN, and HOT SHUTDOWN is specified as ~0. ITS Table 1.1-1 reflects "NA" as the % RATED THERMAL POWER for Refueling, Cold Shutdown, Hot Shutdown, and Hot Standby MODES (MODES 6, 5, 4, and 3, respectively). • The CTS 1.0.l phrase in the definition of REFUELING OPERATION "when the vessel head is unbolted or removed" is incorporated into ITS Table 1.1-1 as Note c. Note c states "One or more reactor vessel head closure bolts less than fully tensioned." • CTS 1.0.j Fission Power break point for OPERATING and HOT STANDBY is changed from 2% to 5% in ITS Table 1.1-1 for MODES 1 and 2.	1.1 Table 1.1-1	1.0.i 1.0.j

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A09 (continued)	This change can be administrative (if either the Applicability of an ITS and CTS Specification includes both MODES 1 and 2 or if the ITS Applicability is MODE 1 and the CTS Applicability is 5% RTP or higher), more restrictive (if the ITS Applicability includes MODE 2 but not MODE 1 and the CTS Applicability is specified as < 5% RTPor lower), or less restrictive (if the ITS Applicability includes MODE 1 but not MODE 2 and the CTS Applicability is specified as > 2% RTP). Therefore, the change will be evaluated at each occurrence where only one of the two MODES is included in a CTS Applicability and DOC with the appropriate classification (A, M, or L) will be written if required. Therefore, this change to the MODE Table is acceptable. • The CTS 1.0.l phrase in the definition of REFUELING OPERATION "when the vessel head is unbolted or removed" is incorporated into ITS Table 1.1-1 as Note c. Note c states "One or more reactor vessel head closure bolts less than fully tensioned." • ITS Table 1.1-1 contains a new Note b, which applies to MODES 4 and 5. Note b states "All reactor vessel head closure bolts fully tensioned." This Note is the opposite of CTS 1.0.l statement concerning REFUELING OPERATION described above. And ITS Table 1.1-1 Note c. • CTS 1.0.j uses the condition FISSION POWER %. ITS Table 1.1-1 uses the condition % RATED THERMAL POWER and includes Note a, which states that decay heat is excluded. • The CTS 1.0.j condition of Reactivity for OPERATING and HOT STANDBY specifies < 0.25% $\Delta k/k$. ITS Table 1.1-1 specifies a Reactivity (in k_{eff}) of $\geq$ 0.99.	1.1 Table 1.1-1	1.0.i 1.0.j
1.0 A010	CTS 1.0.m defines RATED POWER as "RATED POWER is the steady-state reactor core output of 1772 MWt." ITS 1.1 defines RATED THERMAL POWER (RTP) as "RTP shall be a total reactor core heat transfer rate to the reactor coolant of 1772 MWt."	1.1	1.0.m
1.0 A011	CTS 1.0.i.5 provides a definition of FREQUENCY NOTATION and includes CTS Table TS 1.0-1, which lists these notations. The ITS will not contain this information in Section 1.1, but will state the requirements in each Surveillance.	1.1	1.0.i.5 Table TS 1.0-1

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A012	ITS Section 1.1 provides the following definitions: • ACTIONS; • ACTUATION LOGIC TEST; • AXIAL FLUX DIFFERENCE (AFD); • DOSE EQUIVALENT XE-133; • MODE; • PHYSICS TESTS; • STAGGERED TEST BASIS; • THERMAL POWER; and • TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT).	1.1	NA
1.0 A013	ITS Sections 1.2, 1.3, and 1.4 contain information that is not in the CTS. This change to the CTS adds explanatory information on the ITS usage that is not applicable to the CTS. The added sections are: • Section 1.2 – Logical Connectors Section 1.2 provides specific examples of the logical connectors "AND" and "OR" and the numbering sequence associated with their use. • Section 1.3 – Completion Times Section 1.3 provides guidance on the proper use and interpretation of Completion Times. The section also provides specific examples that aid in the understanding of Completion Times. • Section 1.4 – Frequency Section 1.4 provides guidance on the proper use and interpretation of Surveillance Frequencies. The section also provides specific examples that aid in the use and understanding of Surveillance Frequency.	1.2, 1.3, 1.4	NA
1.0 A014	CTS 1.0.s includes the definition of IMMEDIATELY. It states "When Immediately is used as a completion time in an LCO, the required action should be pursued without delay and in a controlled manner." The ITS includes Section 1.3, "Completion Times," which describes the meaning of the term "immediately" when used as a Completion Time. It states "When "immediately" is used, the Required Action should be pursued without delay and in a controlled manner." This changes the CTS by moving the definition of "Immediately" to ITS 1.3 as a description of when "immediately" is used as a Completion Time.	1.3	1.0.s

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A015	CTS 1.0.p states, in part, "The thyroid dose conversion factors used for this calculation shall be listed and calculated based on dose conversion factors derived from ICRP-30. In addition, CTS 1.0.p contains a table that gives a dose conversion factor for various isotopes (I-131, I-132, I-133, I-134, I-135). ITS 1.1 defines DOSE EQUIVALENT I-131, in part, as "The determination of DOSE EQUIVALENT I-131 shall be performed using ICRP-30, 1979, Supplement to Part 1, Page 192 – 212, Table titled, "Committed Dose Equivalent in Target Organs or Tissues per Intake of Unit Activity." The ITS 1.1 definition for DOSE EQUIVALENT I-131 does not include this table. This changes the CTS by providing more detail of the specific ICRP reference.	1.1	1.0.p
2.0 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	2.0	2.0
3.0 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.0	3.0

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.1. A01	In the conversion of the Kewaunee Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.1.1	3.10.a Table TS 4.1-2
3.1.1. A02	CTS 3.10.a states that when the reactor is subcritical prior to startup, the SHUTDOWN MARGIN (SDM) shall be at least that as specified in the COLR. CTS Table 4.1-2 Sampling Test 2 footnote (3) states that the boron concentration test is required in all plant modes. ITS 3.1.1 is applicable in MODE 2 with $k_{eff} < 1.0$ and in MODES 3, 4, and 5. This changes the CTS by specifically stating that the applicability is in MODE 2 with $k_{eff} < 1.0$ and in MODES 3, 4, and 5. The change in Applicability for MODE 1 and MODE 2 with $k_{eff} \geq 1.0$ is discussed in DOC L01. In MODE 6, the reactor head is detensioned or removed, so a reactor startup cannot occur. In addition, ITS 3.9.1 provides the MODE 6 boron concentration limits.	3.1.1 Applicability	3.10.a
3.1.2 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.1.2	4.9
3.1.2 A02	CTS 4.9 requires a comparison of the actual boron concentration with the predicted (computer) value, and requires the difference between the computed boron concentration, as a function of burnup, and the actual boron concentration to be ± 1% Δk/k. ITS 3.1.2 also requires the comparison of the actual boron concentration with the predicted value and requires the difference to be within ± 1% Δk/k, but specifically states that the Applicability is in MODES 1 and 2. This changes the CTS by stating the specific MODES.	3.1.2 Applicability	4.9
3.1.3 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.1.3	3.1.f.3, 3.1.f.4.A 3.1.f.4.B

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.4 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.1.4	3.10.e.1, 3.10.e.2, 3.10.e.3, 3.10.g.1, 3.10.g.2, 3.10.g.3, 3.10.h, 3.10.i, Table TS 4.1-1, Table TS 4.1-3
3.1.5 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.1.5	3.10.d.1
3.1.5 A02 3.1.5 A02	CTS 3.10.d.1 requires the shutdown rods to be withdrawn to within the limits specified in the COLR when the reactor is critical or approaching criticality. ITS 3.1.5 requires each shutdown bank to be within the insertion limits specified in the COLR in MODES 1 and 2. This changes the CTS by clearly specifying the MODES in which the LCO is required.	3.1.5 Applicability 3.1.5 Applicability	3.10.d.1 3.10.d.1
3.1.6 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.1.6	3.10.d.2, 3.10.d.2.A, 3.10.d.2.B, 3.10.d.2.C 3.10.d.3
3.1.6 A02	CTS 3.10.d.2 requires, in part, that the control rod banks are to be limited in physical insertion as specified in the COLR. ITS 3.1.6 requires the control bank to be within the insertion, sequence, and overlap limits specified in the COLR. This changes the CTS by specifically stating that the control bank physical insertion limits are the control bank insertion, overlap, and sequence limits.	LCO 3.1.6	3.10.d.2

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.7 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.1.7	3.10.f, 3.10.f.1, 3.10.f.2, 3.10.f.3, 3.10.f.4, 3.10.f.5, 4.1, Table TS 4.1-1
3.1.7 A02	CTS 3.10.f describes the ACTIONS to take for one inoperable individual rod position indicator channel per group, more than one inoperable individual rod position indicator channel per group, one or more rods with inoperable individual rod position indicators, and one demand position indicator bank inoperable for one or more banks. The lowest plant condition required by the CTS Actions (CTS 3.10.f.2.D) is HOT SHUTDOWN (ITS equivalent MODE 3). ITS 3.1.7 requires similar ACTIONS, but specifically states in the LCO that the Individual Rod Position Indication (IRPI) System and the Demand Position Indication System shall be OPERABLE in MODES 1 and 2. This changes the CTS by stating the specific Limiting Conditions for Operability (LCO) and the specific MODE of Applicability.	3.1.7 Applicability	3.10.f
3.1.7 A03	CTS 3.10.f.4 provides the Actions if one demand position indicator per bank for one or more banks is inoperable. CTS 3.10.f.4.A.2) requires a verification that the most withdrawn rod and the least withdrawn rod of the affected bank(s) are $\leq$ 12 steps apart when > 85% RATED POWER or $\leq$ 24 steps apart when $\leq$ 85% RATED POWER. Under similar conditions, ITS 3.1.7 Required Action C.1.2 requires a verification that the most withdrawn rod and the least withdrawn rod of the affected bank are within the required rod alignment limits of LCO 3.1.4, "Rod Group Alignment Limits." This changes the CTS by not specifying the actual rod alignment limits in this Action, but referencing the applicable LCO where the limits are controlled.	3.1.7 ACTION C	3.10.f.4, 3.10.f.4.A.2)
3.1.7 A04	CTS 3.10.f.5 states that if a rod cluster control assembly having a rod position indicator channel out of service is found to be misaligned when performing 3.10.f.1.A, then 3.10.e will be applied. ITS 3.1.7 does not contain the statement. This changes the CTS by not including the statement that if a rod cluster control assembly having a rod position indicator channel out of service is found to be misaligned, then 3.10.e will be applied.	None	3.10.f.5

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.8 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.1.8	3.1.f.3, 3.10.d.3, 3.10.e, Table TS 3.5-2, Functional Unit 2
3.1.8 A02	CTS 3.1.f.3, CTS 3.10.d.3, and CTS 3.10.e state that the limitations of certain specifications may be suspended during the performance of PHYSICS TESTS. CTS Table TS 3.5-2, Functional Units 2, Nuclear Flux Power Range, states the minimum OPERABLE channel requirement is 3, except as modified by Note (1). ITS LCO 3.1.8 includes an allowance to reduce the required number of channels for ITS LCO 3.3.1, "RPS Instrumentation," Functions 2 (Power Range Neutron Flux), 3 (Power Range Neutron Flux Rate), 6 (Overtemperature ΔT), and 16.d (Power Range Neutron Flux, P-10) from "4" to "3" during PHYSICS TESTS. This changes the CTS by stating the specific number of RPS channels from that have to be OPERABLE during PHYSICS TESTS.	LCO 3.1.8	3.1.f.3, 3.10.d.3, 3.10.e
3.1.8 A03	CTS 3.1.f.3 states that the Moderator Temperature Coefficient requirement specified in the COLR may be suspended during the performance of LOW POWER PHYSICS TESTING. CTS 3.10.d.3 states that the Rod Insertion Limits do not apply during the performance of PHYSICS TESTS. CTS 3.10.e states that the Rod Misalignment Limitations do not apply during the performance of PHYSICS TESTS. ITS 3.1.8 is applicable "During PHYSICS TESTS initiated in MODE 2." This changes the CTS such that the Specification is applicable in MODE 2 only when a PHYSICS TEST is initiated.	3.1.8 Applicability	3.1.f.3
3.2.1 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS). Furthermore, it should be noted that the terms $F_Q^N(Z)$, $F_Q^N(Z)$ equilibrium, and $F_Q^N(Z)$ transient are being changed to $F_Q(Z)$, $F_Q^C(Z)$, and $F_Q^T(Z)$ respectively.	3.2.1	3.10.b.1, 3.10.b.1.A, 3.10.b.3, 3.10.b.4, 3.10.b.4.B, 3.10.b.5, 3.10.b.6, 3.10.b.7

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2.1 A02	CTS 3.10.b.1 requires the CTS 3.10.b.1.A $F_Q^N(Z)$ limits to be met "at all times, except during Low Power Physics Tests." However, CTS 3.10.b.3.B and 3.10.b.7.B, which provides the actions when the $F_Q^N(Z)$ limits are not met, only requires the unit to reduce reactor power to ≤ 5% RTP. ITS 3.2.2 requires the FQ(Z) limits to be met in MODE 1, with no exception for low power physics tests. This changes the CTS by clearly stating the Applicability of the $F_Q^N(Z)$ limits to be consistent with the actions.	3.2.1 Applicability	3.10.b.1.A
3.2.1 A03	CTS 3.10.b.4 provides the Surveillance Requirement for periodically verifying $F_Q^N(Z)$ equilibrium relationship is within limit. A Note to CTS 3.10.b.4 states that the time requirements may be extended by 25%. ITS SR 3.2.1.1, which confirms the $F_Q^N(Z)$ equilibrium relationship is within limits (i.e., the $F_Q^C(Z)$ limit), does not include this specific allowance. CTS 3.10.b.6 provides the Surveillance Requirement for periodically verifying $F_Q^N(Z)$ transient relationship is within limit and includes a similar allowance for a 25% grace period. ITS SR 3.2.1.2, which confirms the $F_Q^N(Z)$ transient relationship is within limit (i.e., the $F_Q^T(Z)$ limit), does not include this specific allowance. This change deletes the specific 25% allowance of CTS 3.10.b.4 and 3.10.b.6.	SR 3.2.1.1	3.10.b.4

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2.1 A04	CTS 3.10.b.4 provides the Surveillance Requirement for periodically verifying $F_Q^N(Z)$ equilibrium relationship is within limit. CTS 3.10.b.4.A requires the Surveillance to be performed once within 12 hours of achieving equilibrium conditions, after exceeding, by $\geq$ 10% of RATED POWER, the thermal power at which the $F_Q^N(Z)$ equilibrium relationship was last verified. CTS 3.10.b.6 provides the Surveillance Requirement for periodically verifying $F_Q^N(Z)$ transient relationship is within limit. CTS 3.10.b.6.B requires the Surveillance to be performed once within 12 hours of achieving equilibrium conditions after reaching a thermal power level > 10% higher than the power level at which the last power distribution measurement was performed in accordance with CTS 3.10.b.6.A. ITS SR 3.2.1.1 and SR 3.2.1.2 require similar Surveillances, except both SRs are modified by a Note to the Surveillance Requirements Table which states that during power escalation at the beginning of each cycle, THERMAL POWER may be increased until an equilibrium power level has been achieved, at which a power distribution map is obtained. This changes the CTS by clearly stating that 12 hour time limit to perform the 10% RTP power change Frequency for verifying the $F_Q^N(Z)$ equilibrium relationship and the $F_Q^N(Z)$ transient relationship only starts after equilibrium power is attained - not immediately after a 10% RTP power change.	SR 3.2.1.1, SR 3.2.1.2	3.10.b.4, 3.10.b.6.B
3.2.2 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.2.2	3.10.b.1, 3.10.b.1.B, 3.10.b.2 3.10.b.4, 3.10.b.4.B
3.2.2 A02	CTS 3.10.b.1 requires the CTS 3.10.b.1.B $F_{\Delta H}^N$ limits to be met "at all times, except during Low Power Physics Tests." However, CTS 3.10.b.2.B, which provides the actions when the $F_{\Delta H}^N$ limits are not met, only requires the unit to reduce reactor power to ≤ 5% RTP. ITS 3.2.2 requires the $F_{\Delta H}^N$ limits to be met in MODE 1, with no exception for low power physics tests. This changes the CTS by clearly stating the Applicability of the $F_{\Delta H}^N$ limits to be consistent with the actions.	3.2.2 Applicability	3.10.b.1, 3.10.b.1.B, 3.10.b.2.B

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2.2 A03	When $F^N_{\Delta H}$ is exceeding its limit, CTS 3.10.b.2.A.i requires that within 4 hours, either restoring $F^N_{\Delta H}$ to within its limit or reducing thermal power to < 50% RTP. ITS 3.2.2 does not state the requirement to restore $F^N_{\Delta H}$ to within its limit, but includes the other compensatory Required Action to take within 4 hours (i.e., reduce THERMAL POWER to < 50% RTP). This changes the CTS by not explicitly stating the requirement to restore $F^N_{\Delta H}$ to within its limit.	None	3.10.b.2.A.i
3.2.2 A04	CTS 3.10.b.2.C states that with $F^N_{\Delta H}$ exceeding its limit, $F^N_{\Delta H}$ must be demonstrated to be within its limit prior to exceeding 50% RTP and 75% RTP, and within 24 hours of attaining ≥ 95% RTP. ITS 3.2.2 Required Action A.4 contains the same requirements. However, ITS 3.2.2 Required Action A.4 is modified by a Note which states "THERMAL POWER does not have to be reduced to comply with this Required Action." This modifies the CTS by adding a Note stating that THERMAL POWER does not have to be reduced to comply with the Required Action.	3.2.2 Required Action A.2 Note	3.10.b.2.C
3.2.2 A05	CTS 3.10.b.2.C states that with $F^N_{\Delta H}$ exceeding its limit "Identify and correct the cause of the out-of-limit condition prior to increasing thermal power above the reduced thermal power limit required by action A and/or B, above." ITS 3.2.2 does not include this requirement. This changes the CTS by eliminating the statement that the cause of the out-of-limit condition must be identified and corrected prior to increasing power.	None	3.10.b.2.C
3.2.2 A06	CTS 3.10.b.4 provides the Surveillance Requirement for periodically verifying $F^N_{\Delta H}$ is within limit. A Note to CTS 3.10.b.4 states that the time requirements may be extended by 25%. ITS SR 3.2.2.1 does not include this specific allowance. This change deletes the specific 25% allowance of CTS 3.10.b.4.	SR 3.2.2.1	3.10.b.4
3.2.3 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.2.3	3.10.b.8 Table TS 4.1-1 Channel Description 44

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2.4 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.2.4	3.10.c
3.2.4 A02	CTS 3.10.c provides actions to be taken if the QPTR is not within limits (i.e., > 1.02), but does not provide an actual LCO type of statement or an Applicability statement. Furthermore, CTS 3.10.c.1 and CTS 3.10.c.3 states that the actions are not required during Physics Tests. If the QPTR is not restored to ≤ 1.02 as required by CTS 3.10.c.1, then CTS 3.10.c.2 requires the unit to reduce power to ≤ 50% RTP. Thus, the effective Applicability for the QPTR limit is when the reactor is > 50% RTP except during a Physics Test. ITS 3.2.4 requires the QPTR to be ≤ 1.02 in MODE 1 with THERMAL POWER > 50% RTP.	3.2.4 Applicability	3.10.c, 3.10.c.1, 3.10.c.2
3.2.4 A03	When the QPTR is exceeding its limit, CTS 3.10.c.1 requires that within 2 hours either "Eliminate the tilt" (i.e., restore the QPTR to within limit) or restrict maximum core power level 2% for every 1% of indicated power tilt ratio > 1.0. ITS 3.2.4 does not contain a specific requirement to restore the QPTR to within its limit, but includes the other compensatory Required Action to take within 2 hours (i.e., reduce THERMAL POWER ≥ 3% from RTP for each 1% of QPTR > 1.00 - Note: See Discussion of Change M01 for change from 2% to 3%). This changes the CTS by not explicitly stating the requirement to restore the QPTR to within its limit.	3.2.4 Required Action A.1	3.10.c.1.A
3.3.1 A01	In the conversion of CTS to the plant specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.3.1	3.5, Table TS 3.5-2 4.1, Table TS 4.1-1, Table TS 4.1-3

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A02	CTS 3.5.c and Table TS 3.5-2 provide the compensatory actions to take when the RPS Instrumentation is inoperable. ITS 3.3.1 ACTIONS includes a Note that allows separate condition entry for each Function. In addition, due to the manner in which the titles of ITS Table 3.3.1-1 Functions 10, 11.a, 11.b, 12, 13, 14, 15, and 17 are presented, a separate condition entry is allowed within a Function as follows: a. For Function 10 (Reactor Coolant Flow – Low on a loop basis; b. For Function 11.a (Reactor Coolant Pump (RCP) Breaker Position (Single Loop)) on a RCP basis; c. For Function 11.b (Reactor Coolant Pump (RCP) Breaker Position (Two Loop)) on a RCP basis; d. For Function 12 (Undervoltage RCPs) on a bus basis; e. For Function 13 (Underfrequency RCPs) on a bus basis; f. For Function 14 (Steam Generator (SG) Water Level Low Low) on a steam generator basis; g. For Function 15 (SG Water Level – Low (Coincident with Steam Flow/Feedwater Flow Mismatch) on a steam generator basis; and h. For Function 17 (Reactor Trip Breakers (RTBs) on a train basis. This modifies the CTS by providing a specific allowance to enter the Action for each inoperable RPS Instrumentation Function and for certain Functions on a loop, steam generator, or train basis.	Table 3.3.1-1 Function 10, Function 11.a, Function 11.b, Function 12, Function 13, Function 14, Function 15, Function 17	3.5.c, Table TS 3.5-2

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A03	CTS Table TS 3.5-2, Column 3 specifies the "MINIMUM OPERABLE CHANNELS" associated with each RPS Functional Unit and CTS 3.5.2 specifies the actions to take when the number of channels for a particular Functional Unit is less than the Column 3 requirements. Additionally, the Notes for Table TS 3.5-2 contain a table that pertains to the RPS Permissives and Interlocks. This Note table contains a column titles "Coincident," which describes the coincidence logic needed for each permissive/interlock. ITS LCO 3.3.1 requires the RPS Instrumentation to be OPERABLE, and includes only one column in Table 3.3.1-1 titled "REQUIRED CHANNELS." This changes the CTS by changing the title of the MINIMUM OPERABLE CHANNELS" and "Coincidence" columns to "REQUIRED CHANNELS." In addition, the P-7 channel description has been changed to 1 per train.	3.3.1 REQUIRED CHANNELS	Table TS 3.5-2
3.3.1 A04	CTS Table TS 3.5-2 Column 6 specifies the "OPERATOR ACTION IF CONDITIONS OF COLUMN 3 OR 4 CANNOT BE MET." CTS Table TS 3.5-2 Column 6 requires maintaining HOT SHUTDOWN for Functional Units 1, 2, 3, 4, 5, 6, 8, 9, 10, 12, 13, 14, 16, and 17. Based on the CTS Table TS 3.5-2 requirement to maintain HOT SHUTDOWN, the Mode of Applicability would be considered OPERATING and HOT STANDBY for Functional Units 1(Manual), 2, (Nuclear Flux Power Range (High Setting, Positive Setting, and Negative Setting)), 5 (Overtemperature ΔT), 6 (Overpower ΔT), 8 (High Pressurizer Pressure), 12 (Lo-Lo Steam Generator Water Level), 16 (Steam Flow/Feedwater Flow Mismatch), and 17 (Reactor Trip Breaker (RTB) and (Independently Test Shunt and Undervoltage Trip Attachments). For Functional Unit 2 (Nuclear Flux Power Range (Low Setting)), the Mode of Applicability is OPERATING below the P-10 interlock and HOT STANDBY for the Nuclear Flux Power Range (Low Setting) because Column 5 of Table TS 3.5-2 lists the permissible bypass condition as P-10. This means that the Nuclear Flux Power Range (Low Setting) channels are blocked above the P-10 setting. With the P-10 Setting Limit of < 7.8% RATED POWER, Nuclear Flux Power Range (Low Setting) would be required to be OPERABLE in the OPERATING MODE below the P-10 limit and in HOT STANDBY. For Functional Unit 3 (Nuclear Flux Intermediate Range), the MODE of Applicability is OPERATING below the P-10 interlock and HOT STANDBY because Column 5 of Table TS 3.5-2 lists the permissible bypass condition as P-10. This means that the Nuclear Flux Intermediate Range channels are blocked above the P-10 setting. With the P-10 Setting Limit of < 7.8% RATED POWER, Nuclear Flux Intermediate Range would be required to be OPERABLE in the OPERATING MODE below the P-10 limit. Furthermore, since the Nuclear Flux Intermediate Range are not required until above the P-6 setting, then the HOT	ITS Table 3.3.1-1 Function 1, 2.a, 2.b, 3.a, 3.b, 4, 6, 7, 8.b, 14, 15, 17, and 18 Applicability	Table TS 3.5-2 Functional Unit 1, Functional Unit 2, Functional Unit 3, Functional Unit 4, Functional Unit 5, Functional Unit 6, Functional Unit 8, Functional Unit 9, Functional Unit 10, Functional Unit 12, Functional Unit 13, Functional Unit 14, Functional Unit 16, Functional Unit 17

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A04 (Continued)	STANDBY requirement would only be above the P-6 setting. Therefore, the MODE of Applicability, for the Nuclear Flux Intermediate Range, would be OPERATING below the P-10 interlock and HOT STANDBY above the P-6 interlock. For Functional Unit 4 (Nuclear Source Range), the Mode of Applicability is HOT STANDBY because Column 5 of Table TS 3.5-2 lists the permissible bypass condition as P-6. This means that the Nuclear Source Range channels are blocked when above the P-6 setting. With the P-6 Setting Limit of > 10^{-5}% RATED POWER, the Nuclear Source Range would not be required to be OPERABLE above HOT STANDBY. For Functional Unit 7 (Low Pressurizer Pressure), 9 (Pressurizer High Water Level), 13 (Undervoltage 4-kV), and 14 (Underfrequency 4-kV), the Mode of Applicability is OPERATING because Column 5 of Table TS 3.5-2 lists the permissible bypass condition as P-7. This means that the Low Pressurizer Pressure channel, the Pressurizer High Water Level, the Undervoltage 4-kV, and the Underfrequency 4-kV channels are blocked when below the P-7 setting. With the P-7 Setting Limit of > 12.2% RATED POWER, the Low Pressurizer Pressure, the Pressurizer High Water Level, the Undervoltage 4-kV, and the Underfrequency 4-kV would not be required to be OPERABLE below the OPERATING MODE. For Functional Unit 10 (Low Flow in One Loop and Low Flow Both Loops), the Mode of Applicability is OPERATING because Column 5 lists the permissible bypass condition for Low Flow in One Loop as P-8 and for Low Flow in Two Loops as P-7. For the Low Flow in One Loop, this means that the channels are blocked when below the P-8 setting. With the P-8 Setting Limit of < 10% RATED POWER, Low Flow in One Loop channel would not be required to be OPERABLE below the OPERATING MODE. For the Low Flow in Two Loops, this means that the channels are blocked when below the P-7 setting. With the P-7 Setting Limit of > 12.2% RATED POWER, the channel would not be required to be OPERABLE below the OPERATING MODE. ITS LCO 3.3.1 requires the RPS instrumentation in Table 3.3.1-1 to be OPERABLE. ITS Table 3.3.1-1 Function 1, 2.a, 2.b, 3.a, 3.b, 4, 6, 7, 8.b, 14, 15, 17, and 18 state that the APPLICABLE MODE OR OTHER SPECIFIED CONDITIONS is MODE 1 and 2. ITS Table 3.3.1-1 Function 2.b (Power Range Neutron Flux – Low) states that the APPLICABLE MODE OR OTHER SPECIFIED CONDITIONS is MODE 1 below the P-10 (Power Range Neutron Flux) interlock and MODE 2. ITS Table 3.3.1-1 Function 4 states that the APPLICABLE MODE OR	ITS Table 3.3.1-1 Function 1, 2.a, 2.b, 3.a, 3.b, 4, 6, 7, 8.b, 14, 15, 17, and 18 Applicability	Table TS 3.5-2 Functional Unit 1, Functional Unit 2, Functional Unit 3, Functional Unit 4, Functional Unit 5, Functional Unit 6, Functional Unit 8, Functional Unit 9, Functional Unit 10, Functional Unit 12, Functional Unit 13, Functional Unit 14, Functional Unit 16, Functional Unit 17

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A04 (Continued)	OTHER SPECIFIED CONDITIONS is MODE 1 below the P-10 (Power Range Neutron Flux) and MODE 2 above the P-6 (Intermediate Range Neutron Flux) Interlocks. ITS Table 3.3.1-1 Function 5 (Source Range Neutron Flux) state that the APPLICABLE MODE OR OTHER SPECIFIED CONDITIONS is MODE 2 below the P-6 (Intermediate Range Neutron Flux) interlocks. ITS Table 3.3.1-1 Function 8.a, 9, 12, and 13 state that the APPLICABLE MODE OR OTHER SPECIFIED CONDITIONS is MODE 1 above the P-7 (Low Power Reactor Trip Block) interlock. ITS Table 3.3.1-1 Function 10 states that the APPLICABLE MODE OR OTHER SPECIFIED CONDITIONS is MODE 1 above the P-8 (Power Range Neutron Flux) interlock. This changes the CTS by explicitly stating the MODES of Applicability for each Functional Unit.	ITS Table 3.3.1-1 Function 1, 2.a, 2.b, 3.a, 3.b, 4, 6, 7, 8.b, 14, 15, 17, and 18 Applicability	Table TS 3.5-2 Functional Unit 1, Functional Unit 2, Functional Unit 3, Functional Unit 4, Functional Unit 5, Functional Unit 6, Functional Unit 8, Functional Unit 9, Functional Unit 10, Functional Unit 12, Functional Unit 13, Functional Unit 14, Functional Unit 16, Functional Unit 17
3.3.1 A05	CTS Table 3.5-2 includes Channels, Coincidence, and setting limits for P-6, P-7, P-8, P-10, and P-13. However, no specific Applicability requirements are provided. ITS Table 3.3.1-1 specifies the Applicable MODES or other specified conditions associated with the P-6, P-7, P-8, P-10, and P-13 interlocks (Functions 16.a, 16.b, 16.c, 16.d, and 16.e). This changes the CTS by adding specific applicable MODES or other specified conditions associated with P-6, P-7, P-8, P-10, and P-13 interlocks.	Table 3.3.1-1 Function 16.a, 16.b, 16.c, and 16.d Applicability	Table TS 3.5-2
3.3.1 A06	CTS 4.1.a requires calibration, testing, and checking of protective instrumentation channels and testing of logic channels shall be performed as specified in Table TS 4.1-1. Table TS 4.1-1 requires performance of a TEST at the frequencies shown on Table TS 4.1-1. CTS 4.1.b requires, in part, equipment tests shall be conducted as specified in Table TS 4.1-3. Table TS 4.1-3 requires performance of a TEST at the frequencies shown on Table TS 4.1-3. Table TS 4.1-1 requires performance of a TEST at the frequencies shown on Table TS 4.1-1. ITS 3.3.1 requires the performance of either a CHANNEL OPERATIONAL TEST (COT), a TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT), or, in the case of the Automatic Trip Logic, an ACTUATION LOGIC TEST. This changes the CTS by changing the TEST requirements to a COT, a TADOT, or an ACTUATION LOGIC TEST.	Table 3.3.1-1	4.1.a, Table TS 4.1-1, Table TS 4.1-3

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A07	Note (a) to CTS Table TS 4.1-1, Channel Description 2 and 3 in the Remarks Section states that Channel Check is once per shift when in service. For ITS Table 3.3.1-1 Function 4 and 5, ITS SR 3.3.1.1, the equivalent CHANNEL CHECK requirement, has a frequency of 12 hours. This changes the CTS by deleting this specific Note.	None	Table TS 4.1-1 Channel Description 2, Channel Description 3
3.3.1 A08	Note (c) to CTS Table TS 4.1-1, Channel Description 2 and 3 in the Remarks Section states that the Channel Check is required in all plant modes. For ITS Table 3.3.1-1 Function 4, ITS SR 3.3.1.1, the equivalent CHANNEL CHECK requirement, is only applicable in MODE 1 below the P-10 (Power Range Neutron Flux) interlocks and in MODE 2 above the P-6 (Intermediate Range Neutron Flux) interlocks consistent with the Applicability of the LCO. For ITS Table 3.3.1-1 Function 5, ITS SR 3.3.1.1, the equivalent CHANNEL CHECK requirement is only applicable in MODE 2 below the P-6 (Intermediate Range Neutron Flux) interlocks which is also consistent with the Applicable of the LCO. This changes the CTS by deleting this specific Note.	SR 3.3.1.1 Table 3.3.1-1 Function 4, Function 5	Table TS 4.1-1 Channel Description 2, Channel Description 3
3.3.1 A09	Note (c) to CTS Table TS 4.1-1, Channel Description 4 in the Remarks Sections states that the Channel Check is not required below HOT SHUTDOWN. For ITS Table 3.3.1-1 Functions 6 and 7, ITS SR 3.3.1.1, the equivalent CHANNEL CHECK requirement, is only applicable in MODES 1 and 2 consistent with the Applicability of the LCO. This changes the CTS by deleting this specific Note.	SR 3.3.1.1 Table 3.3.1-1 Function 6, Function 7	Table TS 4.1-1 Channel Description 4
3.3.1 A10	CTS Table TS 3.5-2 Notes contains a table listing the permissive/interlock. In the Table, the inputs to P-7 are listed but no title is given. The inputs for P-7 are from the Power Range Neutron Flux (P-10) and the Turbine Impulse Pressure (P-13) interlock. ITS Table 3.3.1-1 Function 16.b describes the P-7 interlock as the Low Power Reactor Trips Block. Additionally, it describes the P-13 input as the Turbine Impulse Pressure. This changes the CTS by stating the titles for the P-7 and P-13 interlocks.	Table 3.3.1-1 Function 16.b	Table TS 3.5-2

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A11	CTS Table TS 3.5-2 Functional Unit 14 provides the requirements for the Underfrequency 4-kV Bus reactor trip function. When the minimum number of Underfrequency 4-kV Bus channels are not maintained OPERABLE (Column 3), Column 6 requires maintaining HOT SHUTDOWN. Furthermore, CTS Table TS 3.5-2 Functional Unit 14 contains a Note that states an underfrequency on the 4-kV buses trips the Reactor Coolant Pump breakers, which in turn trips the reactor when power is above P-7. Based on the above CTS Table TS 3.5-2 Functional Unit 14 and Note 4 requirements, the Reactor Coolant Pump Breaker Position reactor trip (i.e., one channel per RCP breaker) is required to be OPERABLE above the P-7 interlock to support CTS Table 3.5-2 Functional Unit 14. ITS Table 3.3.1-1 Function 11.a (Reactor Coolant Pump (RCP) Breaker Position – Single Loop) and Function 11.b (Reactor Coolant Pump (RCP) Breaker Position – Two Loops) each require one RCP Breaker Position channel per RCP to be OPERABLE. The Applicability for these channel requirements is MODE 1 above the P-8 interlock for Function 11.a and MODE 1 above the P-7 interlock for Function 11.b. This changes the CTS by explicitly stating the RCP Breaker Position requirements, including the number of required channels and the Applicability.	Table 3.3.1-1 Function 11.a, Function 11.b	Table TS 3.5-2 Functional Unit 14
3.3.1 A12	CTS Table TS 4.1-1 specifies the applicable testing requirements for the Protective System Logic Channels. Although the CTS does not provide a specific Applicability nor a specific number of Required Channels, all RPS Protective System Logic Channels are required to be OPERABLE when the associated Reactor Protection System (RPS) channels are required. Therefore, the Applicability of the Protective System Logic Channels is OPERATING and HOT STANDBY, which covers the Applicability of all of the RPS channels. ITS Table 3.3.1-1 Function 19 (Automatic Trip Logic) requires two trains of the Automatic Trip Logic to be OPERABLE in MODES 1 and 2. This changes the CTS by explicitly stating the requirements for the Protective System Logic Channels, including the number of required trains and the Applicability. The change that adds the Applicability of MODES 3, 4, and 5 when the Rod Control System is capable of rod withdrawal or when one or more rods are not fully inserted Applicability is covered by DOC M12.	Table 3.3.1-1 Function 19	Table TS 4.1-1

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A13	Note (b) to CTS Table TS 4.1-1 Channel Description 2 (Nuclear Intermediate Range) states in the Remarks Sections to "log level" during the performance of the CHANNEL FUNCTIONAL TEST. ITS Table 3.3.1-1 Function 4 (Intermediate Range Neutron Flux) requires performance of a COT (SR 3.3.1.8), but does not contain a specific requirement to "log level." This changes the CTS by deleting the specific requirement to "log level" during the performance of the COT. The purpose of Note (b) to CTS Table TS 4.1-1 Channel Description 2 is to ensure that the Nuclear Intermediate Range instrumentation is OPERABLE. This change is acceptable because this requirement duplicates the requirements of 10 CFR 50 Appendix B, Section XVII (Quality Assurance Records) to maintain records of activities affecting quality, including the results of tests (i.e., Technical Specification Surveillances). Compliance with 10 CFR 50 Appendix B is required in the KPS Operating License, which is adequate to ensure appropriate data is taken and maintained. The details of the regulations within the Technical Specifications are repetitious and unnecessary. Therefore, retaining the requirement to perform the associated Surveillance and eliminating the details from Technical Specification that are found in 10 CFR 50 Appendix B is considered a presentation preference. As such, this change is considered an administrative change.	None	Table TS 4.1-1 Note (b)

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A14	CTS Table TS 4.1-1, "Minimum Frequencies for Checks, Calibrations and Test of Instrument Channels, "Channel Description 26, "Protective System Logic Channel Testing," requires monthly testing of the Protective System Logic Channels. CTS 1.0.h.4, "Protection System," states that the Protection System consists of both the Reactor Protection System (RPS) and the Engineered Safety Features System (ESFS). Two logic matrices of the RPS Logic Matrix and one function listed in CTS Table 3.5-2 are not included in this monthly RPS Protective System Logic Channel Test. The two logic matrices not included are 1) the Safety Injection - Reactor Trip matrix and 2) the Reactor Coolant Pump Breaker- Reactor Trip matrix. The function listed in CTS Table 3.5-2 that is not required to be tested in the RPS Logic Test is Function 14, Underfrequency 4-kV Bus. CTS Table TS 4.1-3, "Minimum Frequencies for Equipment Tests," Equipment Test Ib, Reactor Coolant Pump Breakers-Open-Reactor Trip, and CTS 4.6.a.2 test these features each refueling outage or on a refueling interval. ITS SR 3.3.1.5, Note 3; SR 3.3.1.16; and SR 3.8.1.16 ensure these features are tested on the same frequency, 18-months. Because the CTS testing of these features on an 18-month frequency (refueling), this change clarifies the current testing requirements and is considered administrative. Other CTS testing requirements cover Kewaunee Protection System Logic channel matrices for the Safety Injection-Reactor Trip and the Reactor Coolant Pump (RCP) Breaker-Reactor Trip features. The RCP breaker position testing is controlled by CTS Table 4.1-3, "Minimum Frequencies for Equipment Tests," Equipment Test 1b, Reactor Coolant Pump Breakers-Open- Reactor Trip. Equipment Test 1b requires testing of this function for operability each refueling outage. The Safety Injection-Reactor Trip testing is controlled by CTS surveillance 4.6.a.2, where a test of the automatic start of each diesel generator, load shedding, and restoration to operation of particular vital equipment, initiated by a simulated loss of normal a-c station service power supplies together with a simulated safety injection signal is performed. CTS Table TS 3.5-2, Function 14, does not have a matrix in the Protection System channel but provides a trip of the RCPs, as stated, by Note 4, included with CTS Table TS 3.5-2, Function 14.	3.3.1	Table TS 4.1-1, CTS 1.0.h.4, Table 3.5-2, Table TS 4.1-3, CTS 4.6.a.2, surveillance 4.6.a.2

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A14 (continued)	The design of Kewaunee Power Station is such that if the Reactor Coolant Pump Breaker for the Reactor Protection system logic channel were tested at-power, a plant trip would occur. The Safety Injection - Reactor Trip feature cannot be tested at power because Kewaunee's design will not allow cycling of the slave relays at power. Additionally, the Underfrequency 4-kV Bus circuit trips the RCP, which then generates a reactor trip signal. Therefore, Kewaunee's design and CTS support testing these functions on an 18-month frequency.	3.3.1	Table TS 4.1-1, CTS 1.0.h.4, Table 3.5-2, Table TS 4.1-3, CTS 4.6.a.2, surveillance 4.6.a.2
3.3.1 A15	CTS 3.5.c states, in part, that when the number of channels of a subsystem fall below the limits given in Table TS 3.5-2 Column 3, operation shall be limited according to the requirement shown in Column 6 as soon as practicable. Table TS 3.5-2 Functional Unit 3 (Nuclear Flux Intermediate Range), Column 3 requires one Nuclear Flux Intermediate Range channel to be OPERABLE and Table TS 3.5-2 Functional Unit 4 (Nuclear Flux Source Range), Column 3 requires one Nuclear Flux Source Range channel to be OPERABLE. Column 6 for the requirements associated with Functional Units 3 and 4 is modified by a note, Note 3. Note 3 states that when a block condition exists, maintain normal operation. The block (bypass) condition for Functional Unit 3 is P-1O while the block (bypass) condition for Functional Unit 4 is P-6. Therefore, when the plant is operating in a condition where the block condition is satisfied and the minimum operable channels for these Functional Units do not meet the Column 3 requirements, normal operation can still be maintained. When plant operating conditions change such that the block condition is no longer satisfied, the requirements of Column 6 apply and the plant must be brought to the Hot Shutdown condition as soon as practicable. Although CTS Table 3.5-2 Functional Unit 2, Nuclear Flux Power Range - Low Setting, Column 6 does not contain this same note (Note 3), it does have a permissible bypass condition (Column 5) of P-10. ISTS does not provide this allowance. Therefore, the Note in SR 3.3.1.5 is being modified to not only include P-7 (Function 16.b) but to also include Function 2.b, 4, and 5 for Function 19. This changes ITS to include similar requirements that are in CTS. These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.	3.3.1	CTS 3.5.c, Table TS 3.5-2,

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 A01	In the conversion of CTS to the plant specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.3.2	3.5, Table TS 3.5-1, Table TS 3.5-2, Table TS 3.5-3, Table TS 3.5-4, 4.1, Table TS 4.1-1, 3.3.e
3.3.2 A02	CTS 3.5.c and Tables TS 3.5-2 through TS 3.5-4 provide compensatory actions to take when the ESFAS instrumentation is inoperable. ITS 3.3.2 ACTIONS provide the compensatory actions for inoperable ESFAS instrumentation. ITS 3.3.2 ACTIONS include a Note that allows separate condition entry for each Function. In addition, due to the manner in which the titles for Function 1.e, 2.c, 4.d, 4.e, 5.b, 6.b, 6.c, 6.d, and 6.e are presented, a separate condition entry is allowed within a Function as follows: a. For Function 1.e (Safety Injection – Steam Line Pressure - Low) on a per steam line basis; b. For Function 2.c (Containment Spray – Containment Pressure - High High) on a per set basis; c. For Function 4.d (Steam Line Isolation – High Steam Flow) on a per steam line basis; d. For Function 4.d (Steam Line Isolation – High Steam Flow – Coincident with Safety Injection) on a per steam line basis; e. For Function 4.d (Steam Line Isolation – High Steam Flow – Coincident with T_{avg} – Low Low) on a per loop basis; f. For Function 4.e (Steam Line Isolation – High High Steam Flow) on a per steam line basis; g. For Function 4.e (Steam Line Isolation – High High Steam Flow – Coincident with Safety Injection) on a per steam line basis;	Table 3.3.1-1 Function 1.e, Function 2.c, Function 4.d, Function 4.e, Function 5.b, Function 6.b, Function 6.d, Function 6.e	Table TS 3.5-2 Table TS 3.5-4

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 A02 (continued)	h. For Function 5.b (Feedwater Isolation – SG Water Level - High High) on a per steam generator (SG) basis; i. For Function 6.b (Auxiliary Feedwater – SG Water Level - Low Low) on a per SG basis; j. For Function 6.d (Auxiliary Feedwater – Undervoltage Reactor Coolant Pump) on a per bus basis; and k. For Function 6.e (Auxiliary Feedwater – Trip of both Main Feedwater Pumps) on a per pump basis. This modifies the CTS by providing a specific allowance to enter the Action for each inoperable ESFAS Instrumentation Function and for certain Functions on a per steam line, per set, per loop, per steam generator, per bus and per pump basis.	Table 3.3.1-1 Function 1.e, Function 2.c, Function 4.d, Function 4.e, Function 5.b, Function 6.b, Function 6.d, Function 6.e	Table TS 3.5-2 Table TS 3.5-4
3.3.2 A03	Column 3 of CTS Tables TS 3.5-2, TS 3.5-3, and TS 3.5-4 specifies the "MINIMUM OPERABLE CHANNELS" associated with each Functional Unit. Column 6 of CTS Tables TS 3.5-2, TS 3.5-3, and TS 3.5-4 specifies the actions to take when the number of channels for a particular Functional Unit is less than the Column 3 requirements. ITS LCO 3.3.2 requires the ESFAS Instrumentation to be OPERABLE, and includes only one column in Table 3.3.2-1 titled "REQUIRED CHANNELS." This changes the CTS by changing the title of the MINIMUM OPERABLE CHANNELS" column to "REQUIRED CHANNELS."	Table 3.3.2-1	Table TS 3.5-2, Table TS 3.5-3, Table TS 3.5-4
3.3.2 A04	CTS Table TS 3.5-2 Column 6 and CTS Table TS 3.5-3 Column 6 specify the "OPERATOR ACTION IF CONDITIONS OF COLUMN 3 OR 4 CANNOT BE MET." CTS Table TS 3.5-2 Column 6 requires maintaining HOT SHUTDOWN for Functional Unit 13. Based on the CTS Table TS 3.5-2 requirement to maintain HOT SHUTDOWN, the Mode of Applicability would be considered OPERATING and HOT STANDBY. CTS Table TS 3.5-3 Column 6 requires maintaining HOT SHUTDOWN for Functional Unit 4.b. Based on the CTS Table TS 3.5-3 requirement to maintain HOT SHUTDOWN, the Mode of Applicability would be considered OPERATING and HOT STANDBY. ITS LCO 3.3.2 requires the ESFAS instrumentation in Table 3.3.2-1 to be OPERABLE. ITS Table 3.3.2-1 Function 6.d and 6.e states that the APPLICABLE MODE OR OTHER SPECIFIED CONDITIONS is MODE 1 and 2. This changes the CTS by explicitly stating the MODES of Applicability for each Functional Unit.	Table 3.3.2-1 Function 6.d, Function 6.e	Table TS 3.5-2 Table TS 3.5-3

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 A05	CTS Table TS 3.5-3 Functional Unit 4.a (Motor-Driven Auxiliary Feedwater Pumps – Either Steam Generator Lo-Lo Level) and Functional Unit 5.a (Turbine-Driven Auxiliary Feedwater Pumps – Both Steam Generator Lo-Lo Level) Column 1 ("NO. OF CHANNELS") indicates each Function has 3 channels per loop. ITS Table 3.3.2-1 Function 6.b (Auxiliary Feedwater – SG Water Level-Low Low) indicates the number of REQUIRED CHANNELS to be 3 per SG. This changes the CTS by modifying the descriptions in the " MINIMUM OPERABLE CHANNELS " column. Discussion of Change M03 discusses the change in the number of required channels.	Table 3.3.2-1 Function 6.b	Table TS 3.5-3 Functional Unit 4.a, Functional Unit 5.a
3.3.2 A06	CTS 4.1.a requires calibration, testing, and checking of protective instrumentation channels and testing of logic channels shall be performed as specified in Table TS 4.1-1. Table TS 4.1-1 requires performance of a TEST at the frequencies shown on Table TS 4.1-1. ITS 3.3.2 requires the performance of either a CHANNEL OPERATIONAL TEST (COT) (SR 3.3.2.4) or a TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT) (SR 3.3.2.3 or SR 3.3.2.7). This changes the CTS by changing the TEST requirements to a COT or a TADOT.	SR 3.3.2.3, SR 3.3.2.4, SR 3.3.2.7	Table TS 4.1-1
3.3.2 A07	Note (a) to Channel Description 18.b (Containment Pressure (Steamline Isolation)) of CTS Table TS 4.1-1 in the Remarks Section states the narrow range containment pressure instrumentation (-3.0, +3.0 excluded) is used for this Function. ITS 3.3.2 does not contain the information. This changes the CTS by deleting this remark from the Technical Specifications.	None	Table TS 4.1-1 Channel Description 18.b

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 A08	CTS Table TS 3.5-3 Column 6 and CTS Table TS 3.5-4 Column 6 specify the "OPERATOR ACTION IF CONDITIONS OF COLUMN 3 OR 4 CANNOT BE MET." CTS Table TS 3.5-3 Column 6 requires that the unit be placed in HOT SHUTDOWN (equivalent to ITS MODE 3) for Functional Units 1.a and 3.a of Table TS 3.5-3 and Functional Unit 1.a of Table TS 3.5-4. The HOT SHUTDOWN requirement in Column 6 contains a footnote, footnote (1) for Functional Unit 1.a of Table TS 3.5-3 and Functional Unit 1.a of Table TS 3.5-4, which states if minimum conditions are not met within 24 hours (i.e., restoration of at least the minimum number of OPERABLE channels required in Column 3), steps shall be taken to place the plant in a COLD SHUTDOWN (equivalent to ITS MODE 5) condition. In addition, the HOT SHUTDOWN requirement in Column 6 contains a footnote, footnote (3) for Functional Unit 3.a of Table TS 3.5-3, which states if minimum conditions are not met within 24 hours (i.e., restoration of at least the minimum number of OPERABLE channels required in Column 3), steps shall be taken to place the plant in a COLD SHUTDOWN (equivalent to ITS MODE 5) condition. Based on the CTS requirement to be in COLD SHUTDOWN if minimum conditions are not met within 24 hours, the Mode of Applicability would be considered OPERATING (equivalent to ITS MODE 1), HOT STANDBY (equivalent to ITS MODE 2), HOT SHUTDOWN (equivalent to ITS MODE 3), and INTERMEDIATE SHUTDOWN (equivalent to ITS MODE 4). ITS LCO 3.3.2 requires the ESFAS instrumentation in Table 3.3.2-1 to be OPERABLE. ITS Table 3.3.2-1 Functions 1.a, 2.a, and 3.c state that the APPLICABLE MODE OR OTHER SPECIFIED CONDITIONS is MODES 1, 2, 3, and 4. This changes the CTS by explicitly stating the MODES of Applicability for each Functional Unit.	Table 3.3.2-1 Function 1.a, Function 2.a, Function 3.c	Table TS 3.5-3 Functional Unit 1.a, Functional Unit 3.a, Table TS 3.5-4 Functional Unit 1.a

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 A09	CTS Table 3.5-3 Functional Unit 1.c (Safety Injection – Low Steam Pressure/Line) Column 3 requires 2 channels to be OPERABLE. ITS LCO 3.3.2 requires the ESFAS instrumentation in Table 3.3.2-1 to be OPERABLE. ITS Table 3.3.2-1 Function 1.e (Safety Injection – Steam Line Pressure-Low) requires three channels per steam line to be OPERABLE. This changes the CTS by identifying the number of required channels on a per steam line basis. Discussion of Change M03 discusses the change in the number of required channels.	Table 3.3.2-1 Function 1.e	Table TS 3.5-3 Functional Unit 1.c
3.3.2 A10	CTS Table 3.5-4 Functional Unit 2.a (Steam Line Isolation – Hi-Hi Steam Flow with Safety Injection) and Functional Unit 2.b (Steam Line Isolation – Hi Steam Flow and 2 of 4 Lo-Lo T_{avg} with Safety Injection) Column 1 ("NO. OF CHANNELS") indicates each Function has 2 channels per loop. ITS Table 3.3.2-1 Function 4.d (Steam Line Isolation – High Steam Flow Coincident with Safety Injection and Coincident with T_{avg}-Low Low) and Function 4.e (Steam Line Isolation – High High Steam Flow Coincident with Safety Injection) indicates the number of steam flow REQUIRED CHANNELS to be 2 per steam line for each Function. This changes the CTS by modifying the descriptions in the "NO. OF CHANNELS" column.	Table 3.3.2-1 Function 4.d, Function 4.e	Table TS 3.5-4 Functional Unit 2.a, Functional Unit 2.b
3.3.2 A11	CTS Table 3.5-4 Functional Unit 4.a (Main Feedwater Isolation – Hi-Hi Steam Generator Level) Column 1 ("NO. OF CHANNELS") indicates there are 3 channels for this Function. ITS Table 3.3.2-1 Function 5.b (Feedwater Isolation – SG Water Level- High High) indicates the number of REQUIRED CHANNELS to be 3 per SG. This changes the CTS by adding a per SG identifier to the "MINIMUM OPERABLE CHANNELS" column.	Table 3.3.2-1 Function 5.b	Table TS 3.5-4 Functional Unit 4.a

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 A12	CTS 3.3.e.1.A.3 requires the turbine building service water header isolation logic to be OPERABLE as part of the OPERABILITY requirements for the Service Water System. The CTS does not provide any explicit Actions to take when the logic is inoperable. Thus, the actions for the associated Service Water train, CTS 3.3.e.2, would be taken. ITS 3.3.2 ACTION J provides the actions for the Turbine Building Service Water Header Isolation logic. When one or more trains (For Function 7.a) or channels (for Function 7.b) are inoperable, the associated Service Water train must be immediately declared inoperable. This would then require entering the appropriate Conditions and Required Actions of ITS 3.7.8, "Service Water System." This changes the CTS by explicitly stating the Required Action and Completion Time for inoperable trains or channels of the Turbine Building Service Water Header Isolation logic.	Table 3.3.2-1 Function 7.a, Function 7.b	3.3.e.1.A.3 3.3.e.2
3.3.2 A13	CTS Table TS 4.1-1 specifies the applicable testing requirements for the Protective System Logic Channels. Although the CTS does not provide a specific Applicability nor a specific number of Required Channels, all ESFAS Protective System Logic Channels are required to be OPERABLE when any of the associated ESFAS channels are required. ITS Table 3.3.2-1 Functions 1.b, 2.b, 3.b, 4.b, 5.a, and 6.a require two trains of the Automatic Actuation Logic and Actuation Relays to be OPERABLE. ITS Table 3.3.2-1 Functions 1.b, 2.b, and 3.b are required to be OPERABLE in MODES 1, 2, 3, and 4. ITS Table 3.3.2-1 Function 4.b is required to be OPERABLE in MODE 1 and MODES 2 and 3 except when all MSIVs are closed and deactivated. ITS Table 3.3.2-1 Function 5.a is required to be OPERABLE in MODE 1 and MODES 2 and 3 except when all MFIVs, MFRVs, and associated bypass valves are closed and de-activated or isolated by a closed manual valve. ITS Table 3.3.2-1 Function 6.a is required to be OPERABLE in MODES 1, 2, and 3. This changes the CTS by explicitly stating the requirements for the Automatic Actuation Logic and Actuation Relays.	Table 3.3.2-1 Function 1.b, Function 2.b, Function 3.b, Function 4.b, Function 5.a, Function 6.a	Table TS 4.1-1
3.3.2 A14	CTS 3.3.e.1.A.3 requires the turbine building service water header isolation logic to be OPERABLE. However, no specific channel description of the logic is provided. ITS Table 3.3.2-1 Function 7 covers this logic. Function 7.a requires two trains of the Automatic Actuation Logic and Actuation Relays to be OPERABLE. Function 7.b requires two channels of the Service Water Pressure – Low to be OPERABLE. This changes the CTS by explicitly stating the logic requirements.	Table 3.3.2-1 Function 7.a, Function 7.b	3.3.e.1.A.3

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 A15	CTS Table TS 4.1-1, Channel Description 26, Protective System Logic Channel Testing requires testing of the Engineered Safety Features Logic Channel. Current testing either verifies the Hi Steam Flow logic is in the required state when steam flow is > the Hi Steam Flow nominal trip setpoint or performs the logic testing when steam flow is < the Hi Steam Flow nominal trip setpoint. ISTS Table 3.3.2-1, Function 4b, Steam Line Isolation - Automatic Actuation Logic and Actuation Relays, requires SR 3.3.2.2 to be performed. SR 3.3.2.2 is an ACTUATION LOGIC TEST that is required to be performed every 92 days on a STAGGERED TEST BASIS. At KPS, the Hi Steam Flow matrix of Function 4.d cannot be tested when steam flow is > the Hi Steam Flow nominal trip setpoint, because the Hi Steam Flow relays cannot be cycled due to plant design. Therefore, a Note has been added for this Function that states "For Function 4.b, when steam flow is > the Hi Steam Flow nominal trip setpoint, the Hi Steam Flow logic portion of this SR consists only of verifying the Hi Steam Flow logic is in its required state. However, all applicable requirements of an ACTUATION LOGIC TEST are required to be performed within 12 hours of reducing steam flow < the Hi Steam Flow nominal trip setpoint." This will allow Hi Steam Flow matrix of Steam Line Isolation circuit to not be performed during this SR when steam flow is > the High Steam Flow nominal trip setpoint, except for verifying that the interlock is in the required state, but still require the SR to be met. Furthermore, anytime power is reduced below the Hi Steam Flow nominal trip setpoint, then all requirements of an ACTUATION LOGIC TEST would either have to be current (i.e., performed within the last 92 days on a STAGGERED TEST BASIS) or be performed within 12 hours after the power reduction to below the Hi Steam Flow nominal trip setpoint. In addition, prior to entering the Applicability of Function 4.b (which is MODE 1, 2,and 3 with the MSIVs open or activated), the SR would also have to be current. This ensures the Steam Line Isolation automatic actuation logic and actuation relays are properly tested prior to entering MODE 1, Modes 2, or 3 with a MSIV open or activated, and when in MODE 1, 2, or 3 with steam flow < the Hi Stream Flow nominal trip setpoint for an extended time. These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS and are consistent with current plant design.	Table 3.3.2-1, Function 4b	CTS Table TS 4.1-1

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.3 A01	In the conversion of CTS to the plant specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.3.3	3.5, Table 3.5-6, 3.11, 4.1, Table TS 4.1-1
3.3.3 A02	CTS Table TS 3.5-6 includes both "REQUIRED TOTAL NO. OF CHANNELS" and "MINIMUM CHANNELS OPERABLE" columns. The number of channels specified in the two columns is different, with the "MINIMUM CHANNELS OPERABLE" column specifying fewer channels. The purpose of the two columns is to specify when Table TS 3.5-6 Notes (1), (2), and (4) are to be entered. ITS Table 3.3.3-1 only has a single column, the "REQUIRED CHANNELS" column. This column includes the same number of channels as in the CTS "REQUIRED TOTAL NO. OF CHANNELS" column. ITS 3.3.3 ACTIONS A, B, C, D, and E provide similar actions for when required channels are inoperable (either one or two or more channels), similar to the Actions provided in CTS Table TS 3.5-6 Notes (1), (2), and (4). This changes the CTS by including only one column specifying the number of channels required to be OPERABLE, with the Conditions in the ITS ACTIONS covering the appropriate conditions under which actions are required with inoperable channels.	Table 3.3.3-1	Table TS 3.5-6

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.3 A03	CTS Table TS 3.5-6, Functional Unit 10, Core Exit Thermocouples, Note (5) states "Refer also to TS 3.11.c and TS 3.11.d." CTS 3.11 is the Core Surveillance Instrumentation that will not be included in the ITS. ISTS 3.3.3, Functions 14 thru 17 are the core exit thermocouples; however, there is no reference in ITS 3.3.3 to a separate Specification for the core exit thermocouples. However the requirements of CTS 3.11.c, as applicable, are included in ITS 3.3.3. This changes the CTS by deleting this reference to a CTS Section that is not included in the ITS.	Table 3.3.3-1 Function 14, Function 15, Function 16, Function 17	Table TS 3.5-6 Functional Unit 10
3.3.3 A04	CTS 3.5.e and Table TS 3.5-6 Notes (1), (2), and (4) provide the compensatory actions to take when a PAM Instrumentation channel is inoperable. ITS 3.3.3 ACTIONS includes a Note that allows separate condition entry for each Function. In addition, since the required channels for Function 12 are on a per steam generator basis, a separate condition entry is allowed within this Function for each steam generator. This modifies the CTS by providing a specific allowance to enter the Action for each inoperable PAM Instrumentation Function and for a certain Function on a steam generator basis.	3.3.3 Table 3.3.3-1 Function 12	3.5.e Table 3.5-6
3.3.3 A05	CTS Table TS 3.5-6 No. 9 (Reactor Vessel Level Indication), requires, in part, two channels to be OPERABLE. ITS 3.3.3 Table 3.3.3-1 Function 6 requires, in part, two channels to be OPERABLE when the Reactor Coolant Pumps (RCP) are on and two channels to be OPERABLE when the RCPs are off. This changes the CTS by requiring 4 channels to be OPERABLE in the ITS for the Reactor Vessel Level Indication.	Table 3.3.3-1 Function 6	Table 3.5-6 No. 9
3.3.3 A06	CTS Table TS 4.1-1 Channel Description 39 requires the performance of a CHANNEL FUNCTIONAL TEST of the Containment Water Level (Wide Range) channel each refueling cycle. ITS SR 3.3.3.3 requires the performance of CHANNEL CALIBRATION every 18 months for Functions other than Function 20 of ITS Table 3.3.3-1. The Containment Sump Water Level (Wide Range) is Function 7 of ITS Table 3.3.3-3. This changes the CTS by requiring the performance of a CHANNEL CALIBRATION in ITS instead of a CHANNEL FUNCTIONAL TEST in CTS.	SR 3.3.3.3 Table 3.3.3-1 Function 7	Table TS 4.1-1 Channel Description 39
3.3.5 A01	In the conversion of CTS to the plant specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.3.5	3.5, Table 3.5-1, Table 3.5-5, 4.1, Table 4.1-1, 4.6.a.6

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.5 A02	CTS 3.5.b, 3.5.c, and 3.5.d and Table TS 3.5-5 provide the compensatory actions to take when the Safeguards Bus Power Supply instrumentation is inoperable. ITS 3.3.5 ACTIONS provide the compensatory actions for inoperable LOOP DG start instrumentation. ITS 3.3.5 ACTIONS include a Note that allows a separate Condition entry for each Function. This modifies the CTS by providing a specific allowance to enter the Action for each inoperable LOOP DG Start Instrumentation Function.	3.3.5	3.5.b, 3.5.c, 3.5.d, Table TS 3.5-5
3.3.5 A03	CTS Table TS 4.1-1, Channel Descriptions 8.b and 8.c require that the 4-KV Voltage (Loss of Voltage) and 4-KV Voltage (Degraded Voltage) safeguards bus channels, respectively, be demonstrated OPERABLE by performance of a monthly TEST (i.e., a CHANNEL FUNCTIONAL TEST). ISTS SR 3.3.5.2 (ITS SR 3.3.5.1) requires the performance of a TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT) once per 31 days. This changes the CTS by changing the CHANNEL FUNCTIONAL TEST requirements to a TADOT.	SR 3.3.5.1	Table TS 4.1-1 Channel Description 8.b, Channel Description 8.c
3.3.6 A01	In the conversion of CTS to the plant specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.3.6	3.5, Table TS 3.5-1, Table TS 3.5-4, 4.1, Table TS 4.1-1
3.3.6 A02	CTS 3.5.b, 3.5.c, and 3.5.d provide the compensatory actions to take when the Containment Purge and Vent isolation instrumentation is inoperable. ITS 3.3.6 ACTIONS provide the compensatory actions for Containment Purge and Vent Isolation Instrumentation. The ITS 3.3.6 ACTIONS include a Note that allows separate Condition entry for each Function. This modifies the CTS by providing a specific allowance to enter the Action for each inoperable Containment Purge and Vent Isolation Instrumentation Function.	3.3.6	3.5.b, 3.5.c, 3.5.d
3.3.6 A03	CTS Table TS 4.1-1, Channel Description 19, Remarks Section Note (b) states that the Channel Check is required in all plant modes. ITS SR 3.3.6.1, the equivalent CHANNEL CHECK requirement, is only applicable in MODES 1, 2, 3, and 4, and during movement of irradiated fuel assemblies within containment. This changes the CTS by deleting this specific Note.	SR 3.3.6.1	Table TS 4.1-1 Channel Description 19

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.6 A04	CTS Table TS 4.1-1, Channel Description 19 requires that the Radiation Monitoring System channels be demonstrated OPERABLE by performance of a channel TEST (i.e. a CHANNEL FUNCTIONAL TEST). ITS SR 3.3.6.3 requires the performance of a CHANNEL OPERATIONAL TEST (COT) for the Radiation Monitoring System channels. This changes the CTS by replacing the CHANNEL FUNCTIONAL TEST requirements with the COT requirements.	SR 3.3.6.3	Table TS 4.1-1 Channel Description 19
3.3.6 A05	Column 3 of CTS Table TS 3.5-4 specifies the "MINIMUM OPERABLE CHANNELS" associated with each Functional Unit and CTS 3.5.2.c specifies the actions to take when the number of channels for a particular Functional Unit is less than the Column 3 requirements. ITS LCO 3.3.6 requires the Containment Purge and Vent Isolation Instrumentation to be OPERABLE, and includes only one column in Table 3.3.6-1 titled "REQUIRED CHANNELS." This changes the CTS by changing the title of the MINIMUM OPERABLE CHANNELS" column to "REQUIRED CHANNELS."	Table 3.3.6-1	3.5.c Table TS 3.5-4
3.3.6 A06	Column 6 of CTS Table TS 3.5-4 contains a footnote (2) that states the detectors that provide a high radiation signal for the initiation of a Containment Purge and Vent Isolation are required for Reactor Coolant System leak detection as referenced in CTS 3.1.d.5. ITS 3.3.6 does not contain this footnote, or a reference to CTS 3.1.d.5. This changes the CTS by deleting the reference footnote.	None	3.1.d.5, Table TS 3.5-4
3.3.7 A01	In the conversion of CTS to the plant specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.3.7	3.12, 4.1, Table TS 4.1-1
3.3.7 A02	The CTS does not contain a specific LCO statement for the CRPAR System Actuation Instrumentation or any ACTIONS to take when the CRPAR System Actuation Instrumentation is inoperable. Thus, when any required channels are inoperable, the Actions of the CRPAR System, which the instruments support, must be taken. ITS LCO 3.3.7 and Table 3.3.7-1 provide specific requirements to ensure the CRPAR System Actuation Instrumentation is OPERABLE to support the actuation of the CRPAR System. ITS 3.3.7 ACTIONS (as described in DOCs M01, M02, and L01) provide compensatory actions for inoperable CRPAR System Actuation Instrumentation. This modifies the CTS by providing a specific LCO for the CRPAR System Actuation Instrumentation, providing specific ACTIONS to take as compensatory actions when the required CRPAR System Actuation Instrumentation is inoperable (as described in DOCs M01, M02, and L01).	3.3.7	None

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.7 A03	CTS Table TS 4.1-1, Channel Description 19, Remarks Section Note (b) states that the Channel Check is required in all plant modes. ITS SR 3.3.7.1 provides an equivalent CHANNEL CHECK requirement, which is applicable in MODES 1, 2, 3, and 4, and during movement of irradiated fuel assemblies within containment. This changes the CTS by deleting this specific Note.	SR 3.3.7.1	Table TS 4.1-1 Channel Description 19
3.3.7 A04	CTS Table TS 4.1-1, Channel Description 19 requires that the Radiation Monitoring System channels be demonstrated OPERABLE by performance of a quarterly channel TEST (i.e., CHANNEL FUNCTIONAL TEST). ITS SR 3.3.7.2 requires the performance of a CHANNEL OPERATIONAL TEST (COT) of the Radiation Monitoring channels. This changes the CTS by changing the CHANNEL FUNCTIONAL TEST requirement to a COT.	SR 3.3.7.2	Table TS 4.1-1 Channel Description 19
3.3.7 A05	CTS 3.12.a does not identify that a Safety Injection (SI) Signal starts the CRPAR System. The SI signal requirements are currently covered by CTS 3.5 and Table TS 3.5-3. ITS Table 3.3.7-1 Function 3 identifies that an SI signal starts the CRPAR System. However, the Table states to refer to LCO 3.3.2, "ESFAS Instrumentation," Function 1 for all initiation functions and requirements. This includes appropriate ACTIONS and Surveillance Requirements. This changes the CTS by identifying that an SI signal is sent to the CRPAR System and affects operation of the CRPAR System.	Table 3.3.7-1 Function 3	3.12.a
3.4.1 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.1	3.10.k, 3.10.l, 3.10.m, 3.10.n
3.4.1 A02	CTS 3.10.m.2 states, in part, that compliance with the reactor coolant total flow rate shall be demonstrated by verifying the reactor coolant flow during initial power escalation following each REFUELING, at or above 90% power "with plant parameters as constant as practical." ITS SR 3.4.1.4 requires measurement of the RCS total flow rate and is modified by a Note which states, "Not required to be performed until 24 hours after ≥ 90% RTP." This changes the CTS by explicitly specifying the time required to perform the Surveillance after entering MODE 1 conditions. That is, it defines how long the plant has to get the parameters constant.	SR 3.4.1.4	3.10.m.2

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.3 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.3	3.1.b.1, 3.1.b.1.A, 3.1.b.1.B 3.1.f.1 Figure 3.1-1, Figure 3.1-2
3.4.4 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.4	3.1.a.1.A, 3.1.a.1.B
3.4.4 A02	CTS 3.1.a.1.B states, in part, both reactor coolant pumps shall be in operation. ITS LCO 3.4.4 states two RCS loops shall be OPERABLE and in operation. This changes the CTS by requiring the RCS loops to be OPERABLE.	LCO 3.44	3.1.a.1.B
3.4.5 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.5	3.1.a.1.A
3.4.6 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.6	3.1.a.1.A 3.1.a.2.A
3.4.7 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.7	3.1.a.1.A, 3.1.a.1.C, 3.1.a.2.B, 3.1.a.2.B.2

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.7 A02	CTS 3.1.a.1.C restricts starting a reactor coolant pump with one or more of the RCS cold leg temperatures < 200°F unless the secondary water temperature of each steam generator is < 100°F above each of the RCS cold leg temperatures. This restriction is included in ITS 3.4.7 as LCO Note 3; however, the statement "with one or more of the RCS cold leg temperatures < 200°F" is not included in the Note. However, the ITS 3.4.7 Applicability is MODE 5 (which is essentially equivalent to the CTS wording) with RCS loops filled. This changes the CTS by not including the redundant words that are already covered by the MODE 5 Applicability in the Note restriction.	3.4.7	3.1.a.1.C
3.4.7 A03	CTS 3.1.a.2.B, which requires two RHR trains to be OPERABLE, is applicable whenever the average reactor coolant temperature is ≤ 200°F and irradiated fuel is in the reactor. ITS 3.4.8, which also includes similar RHR train OPERABILITY requirements, is applicable in MODE 5 with the RCS loops not filled. RHR requirements in MODE 5 with the RCS loops filled are provided in LCO 3.4.7 and the MODE 6 RHR requirements are provided in LCO 3.9.5 and LCO 3.9.6. This changes the CTS by splitting these RHR requirements into four separate LCOs.	LCO 3.4.7	3.1.a.2.B
3.4.8 A01	In the In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.8	3.1.a.1.A, 3.1.a.2.B
3.4.8 A02	CTS 3.1.a.2.B, which requires two RHR trains to be OPERABLE, is applicable whenever the average reactor coolant temperature is ≤ 200°F and irradiated fuel is in the reactor. ITS 3.4.8, which also includes similar RHR train OPERABILITY requirements, is applicable in MODE 5 with the RCS loops not filled. RHR requirements in MODE 5 with the RCS loops filled are provided in LCO 3.4.7 and the MODE 6 RHR requirements are provided in LCO 3.9.5 and LCO 3.9.6. This changes the CTS by splitting these RHR requirements into four separate LCOs.	LCO 3.4.8	3.1.a.2.B
3.4.9 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.9	3.1.a.6, 3.1.f

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.10 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.10	3.1.a.3
3.4.10 A02	The Applicability for CTS 3.1.a.3 is when the Reactor Coolant System temperature is greater than the LTOP enabling temperature (200°F). Furthermore, when LCO 3.1.a.3 is not being met, CTS 3.1.a.3 Required Action B.2 requires the unit to be in a condition with the LTOP system OPERABLE or reactor vessel head removed. The ITS 3.4.10 Applicability is MODES 1, 2, 3, and 4, and under similar conditions, ITS 3.4.10 Required Action B.2 requires the unit to be in MODE 5. This changes the CTS by clearly stating the MODES in which the pressurizer safety valves are required to be OPERABLE and the MODE the unit has to be placed in when a unit shutdown is required.	3.4.10 Applicability, 3.4.10 ACTION B	3.1.a.3
3.4.11 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.11	3.1.a.5.A, 3.1.a.5.A.1, 3.1.a.5.A.2, 3.1.a.5.A.3, 3.1.a.5.A.4, 3.1.a.5.A.5, Table 4.1-3 Equipment Test 14
3.4.11 A02	CTS 3.1.a.5.A describes the compensatory actions to take when PORV(s) and/or block valve(s) are inoperable. ITS 3.4.11 ACTIONS A, B, C, D, E, F, and G also state the appropriate compensatory actions under the same conditions, however, an ITS 3.4.11 ACTIONS Note has been added. The ITS 3.4.11 ACTION Note allows separate Condition entry for each Pressurizer PORV and PORV block valve. This changes the CTS by explicitly stating the Actions are to be taken separately for each inoperable Pressurizer PORV and PORV block valve.	3.4.11 ACTION Note	3.1.a.5.A

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.11 A03	CTS 3.1.a.5.A.1 applies to one or both PORVs inoperable solely due to excessive seat leakage. CTS 3.1.a.5.A.2 and 3.1.a.5.A.3 applies to one or both PORVs inoperable, respectively, due to causes other than excessive seat leakage. ITS 3.4.11 ACTIONS divide the conditions of PORV inoperability into those in which the PORV is capable of being manually cycled and those which the PORV is not capable of being manually cycled. ITS 3.4.11 ACTION A applies to one or more PORVs inoperable and capable of being manually cycled. ITS 3.4.11 ACTION B applies to one PORV inoperable and not capable of being manually cycled. ITS 3.4.11 ACTION E applies to two PORVs inoperable and not capable of being manually cycled. This changes the CTS by dividing the existing conditions into those in which the PORV can, and cannot, be manually cycled.	3.4.11 ACTION A, 3.4.11 ACTION B, 3.4.11 ACTION E	3.1.a.5.A.1
3.4.11 A04	When PORVs or block valves are inoperable, CTS 3.1.a.5.A.1, 3.1.a.5.A.2, and 3.1.a.5.A.3 provide an option to restore inoperable PORVs to OPERABLE status. CTS 3.1.a.5.A.4 and 3.1.a.5.A.5 provide an option to restore inoperable block valves to OPERABLE status. ITS 3.4.11 does not include this explicit option to restore the valves to OPERABLE status. This changes the CTS by not explicitly stating the option to restore the valves to OPERABLE status.	None	3.1.a.5.A.1, 3.1.a.5.A.2, 3.1.a.5.A.3
3.4.11 A05	CTS 3.1.a.5.A.4 specifies the compensatory actions for one inoperable block valve. CTS 3.1.a.5.A.5 specifies the compensatory actions for two inoperable block valves. ITS 3.4.11 ACTION C specifies the Required Actions for one inoperable block valve and ITS 3.4.11 ACTION F specifies the Required Actions for two inoperable block valves. ITS 3.4.11 ACTION C Required Actions are preceded by a Note that states that the specified Required Actions (C.1 and C.2) do not apply when the block valve is inoperable solely as a result of complying with Required Action B.2 or E.2 and ITS 3.4.11 ACTION F Required Action is preceded by a Note that states that the specified Required Action (F.1) does not apply when the block valve is inoperable solely as a result of complying with Required Action B.2 or E.2. ITS 3.4.11 Required Actions B.2 and E.2 require the removal of power from the applicable block valve when a PORV is inoperable. This changes the CTS by adding the clarification Note that the Required Action to place the PORV in manual control (ITS 3.4.11 Required Action C.1) and to restore a block valve to OPERABLE status (ITS 3.4.11 Required Actions C.2 and F.1) are not applicable when the block valve is inoperable solely due to complying with the ACTIONS for an inoperable PORV.	3.4.11 ACTION C, 3.4.11 ACTION B, 3.4.11 ACTION F	3.1.a.5.A.4, 3.1.a.5.A.5

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.11 A06	CTS Table 4.1-3 Equipment Test 13 requires an operability test of the Pressurizer PORVs every REFUELING outage. CTS Table 4.1-3 Equipment Test 14 requires an operability test of the Pressurizer PORV Block Valves quarterly, with the exception that the Pressurizer PORV Block Valves do not require testing when the valve is administratively closed. As stated in CTS 3.1.a.5.A, the PORVs and associated block valves are only required to be OPERABLE in the OPERATING (equivalent to ITS MODE 1) and HOT STANDBY (equivalent to ITS MODE 2) MODES. Thus, these Surveillances are only required to be performed in the same MODES. ITS 3.4.11 is Applicable in MODES 1, 2, and 3 (as described in Discussion of Change M01), thus the ITS Surveillances are also normally required in MODES 1, 2, and 3. ITS SR 3.4.11.1 requires performance of a complete cycle of each block valve, but Note 2 allows entry into and operation in MODE 3 prior to performing the Surveillance Requirement. ITS SR 3.4.11.2 requires performance of a complete cycle of each PORV, but the Note allows entry into and operation in MODE 3 prior to performing the Surveillance Requirement. This changes the CTS by more clearly stating in the individual Surveillances that testing is not required to be performed in MODE 3.	3.4.11 Applicability, SR 3.4.11.1	3.1.a.5.A, Table 4.1-3 Equipment Test 14
3.4.12 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.12	3.1.a.1.C, 3.1.b.1.C, 3.1.b.4, 3.1.b.4.A, 3.1.b.4.B
3.4.12 A02	CTS 3.1.b.4 states, in part, that the overpressure protection system for low temperature overprotection operation shall be OPERABLE whenever one or more of the RCS cold leg temperatures are ≤ 200ºF and the reactor vessel head is installed. ITS 3.4.12 requires the low temperature overpressure protection (LTOP) System to be OPERABLE in MODE 5 and MODE 6 whenever the reactor vessel head is on. This changes the CTS by clearly stating the MODES of Applicability, consistent with the ITS terminology.	LCO 3.4.12	3.1.b.4
3.4.13 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.13	3.1.d.1, 3.1.d.2, 3.1.d.3, 4.18 4.18.a, 4.18.b

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.14 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.14	3.1.a.4.A, 3.1.a.4.B, 3.1.a.4.C, Table 3.1-2, 4.2.a.3.a, 4.5.b.2.F
3.4.14 A02	CTS 3.1.a.4.B and C specify the compensatory actions to take when the leakage through any RCS PIV is greater than the specified limit. ITS 3.4.14 ACTIONS A and B also state the appropriate compensatory actions under the same condition; however, ITS 3.4.14 ACTIONS Notes 1 and 2 have been added. ITS 3.4.14 ACTIONS Note 1 allows separate Condition entry for each RCS PIV flow path. ITS 3.4.14 ACTIONS Note 2 states "Enter applicable Conditions and Required Actions for systems made inoperable by an inoperable RCS PIV." This changes the CTS by explicitly stating that the Actions are to be taken separately for each inoperable RCS PIV flow path and by explicitly stating that the Conditions and Required Actions for systems made inoperable by an inoperable RCS PIV must be entered.	3.4.14 ACTION A, 3.4.14 ACTION B	3.1.a.4.B, 3.1.a.4.C
3.4.14 A03	CTS 4.5.b.2.F requires testing the RHR System valve interlocks once per operating cycle. In the ITS, this Surveillance has been included as ITS SR 3.4.14.2. In addition, a new LCO has been added which requires the Residual Heat Removal System interlock function to be OPERABLE. This changes the CTS by including the Residual Heat Removal System interlock Surveillance Requirement with the RCS PIV leakage limits and adding a new LCO for the interlock function.	LCO 3.4.14, SR 3.4.14.2	4.5.b.2.F
3.4.15 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.15	3.1.d.4, 4.1.b, Table 4.1-1, Table 4.1-3
3.4.15 A02	CTS 3.1.d.4 does not contain a specific ACTION for all required monitors inoperable. With all required monitors inoperable, CTS 3.0.c would be entered. ITS 3.4.15 ACTION D directs entry into LCO 3.0.3 when all monitors are inoperable. This changes the CTS by specifically stating to enter LCO 3.0.3, which is the equivalent requirement in the ITS, in this System Specification. Changes to CTS 3.0.c are discussed in Section 3.0.	3.4.15 ACTION D	3.1.d.4

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.15 A03	Note (b) to CTS Table TS 4.1-1, Item 19 in the Remarks Section states that the Channel Check is required in all plant modes. ITS SR 3.4.15.1, the equivalent CHANNEL CHECK requirement, is only applicable in MODES 1, 2, 3, and 4, consistent with the Applicability of the LCO. This changes the CTS by deleting this specific Note.	SR 3.4.15.1	Table TS 4.1-1 Channel Description 19
3.4.15 A04	CTS 4.1.b requires the equipment tests to be performed as specified in Table TS 4.1-3. CTS Table TS 4.1-3 Equipment Test 8 requires a weekly OPERABILITY test on the RCS Leakage Detection. The test is modified by Note 1, which states that following maintenance on equipment that could affect the operation of the equipment, tests should be performed to verify OPERABILITY. The Weekly Frequency is modified by a Note (Note 4) that states the Frequency is applicable when the reactor is at power or in the HOT SHUTDOWN condition. The ITS does not include this requirement. This changes the CTS by deleting this weekly OPERABILITY check of the RCS Leak Detection Instrumentation.	None None	4.1.b, Table TS 4.1-3 4.1.b, Table TS 4.1-3 Equipment Test 8
3.4.16 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.16	3.1.c.2.C, Table TS 4.1-2 Sampling Test 1.f
3.4.16 A02	CTS 3.1.c.2.C requires the Table TS 4.1-2 Sampling Test 1.f, RCS isotopic analysis for iodine, to be performed every 4 hours until the specific activity of the primary coolant system is restored to within limits. ITS 3.4.16 Required Action A.1 essentially requires this same analysis, however the explicit statement to perform the isotopic analysis for iodine "until restored to within its limits" has been deleted. This changes the CTS by deleting the explicit statement to perform the isotopic analysis for iodine until the limits are met.	3.4.16 ACTION A	3.1.c.2.C, Table TS 4.1-2 Sampling Test 1.f
3.4.16 A03	CTS 3.1.c.3 provides a cross-reference to CTS 6.9.a.2.D, the Annual Reporting Requirements. ITS 3.4.16 does not contain this cross-reference. This changes the CTS by deleting a cross-reference to another CTS requirement.	None	3.1.c.3
3.4.16 A04	CTS 3.1.c does not preclude the unit from becoming critical or increasing average temperature to > 500°F when the DOSE EQUIVALENT I-131 is > 1.0 µCi/gm for < 48 hours. Thus, during this 48 hour time, the reactor can be made critical and the average temperature can be increased to > 500°F. ITS 3.4.16 ACTION A Note specifies that LCO 3.0.4.c is applicable. This changes the CTS by specifying the applicable ITS LCO that is consistent with the CTS allowance.	3.4.16 ACTION A Note	3.1.c

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.17 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.17	3.1.g.1, 3.1.g.1.A, 3.1.g.1.B, 3.1.g.2, 3.1.g.3, 4.1.9.a, 4.1.9.b
3.5.1 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	None	3.3.a.1, 3.3.a.1.A, 3.3.a.2.A, 3.3.a.2, Table TS 4.1-2 Sampling Test 5
3.5.1 A02	CTS 3.3.a.1 requires various accumulator parameters and components to be OPERABLE for each accumulator, but does not specifically provide an LCO statement. ITS 3.5.1 states that two SI accumulators shall be OPERABLE. This changes the CTS by specifically stating that both accumulators are required to be OPERABLE.	LCO 3.5.1	3.3.a.1
3.5.1 A03	CTS does not contain a specific ACTION for two accumulators inoperable. With two accumulators inoperable, CTS 3.0.c would be entered. ITS 3.5.1 ACTION D directs entry into LCO 3.0.3 when two accumulators are inoperable. This changes the CTS by specifically stating to enter LCO 3.0.3 in this System Specification.	3.5.1 ACTION D	3.0.c
3.5.2 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.5.2	3.3.b , 3.3.b.1, 3.3.b.2.A, 3.3.b.2.B, 3.3.b.5, 4.5.a.1.A, 4.5.a.1.B, 4.5.b.1.A
3.5.2 A02	CTS 3.3.b.5 provides a cross reference to CTS 3.7.c. ITS 3.5.2 does not include this reference. This changes the CTS by deleting a cross reference to another Specification.	None	3.3.b.5

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5.2 A03	CTS 4.5.a.1.A states, in part, that system tests for the Safety Injection System shall be performed once per operating cycle or once every 18 months, whichever occurs first and that a test signal may be utilized during those times when the Reactor Coolant System temperature is ≤ 350°F and Reactor Coolant System pressure is ≤ 350 psig. ITS SR 3.5.2.5 verifies that each ECCS automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal every 18 months. ITS SR 3.5.2.6 verifies that each ECCS pump starts on an actual or simulated actuation signal every 18 months. This changes the CTS by deleting the "once per operating cycle" terminology.	SR 3.5.2.5, SR 3.5.2.6	3.3.b.3, 3.3.b.3.A, 3.3.b.4, 3.3.b.4.B, 4.5.a.1.A, Table 4.1-2 Sampling Test 3
3.5.2 A04	CTS 4.5.a.1.B states, in part, the Safety Injection System test will be considered satisfactory if control board indication or visual observations indicate all components have received the safety injection signal in the proper sequence and timing. Inclusive of this, is the travel of affected valves and positioning of pump motor breakers. ITS SR 3.5.2.5 and SR 3.5.2.6 do not include this statement. This changes the CTS by deleting the specific method of verifying Surveillances.	None	4.5.a.1.B
3.5.4 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	None	Table 4.1-2
3.5.4 A02	CTS Table 4.1-2 Sampling Tests 3 contains an exception (Note 7) that states, in part, that refueling water storage tank (RWST) boron concentration sample does not have to be taken when the RWST is empty during REFUELING outages. ITS 3.5.4 does not contain this exception. This changes the CTS by not stating that the RWST boron concentration sample does not have to be taken when the RWST is empty during REFUELING outages.	None	Table 4.1-2 Sampling Tests 3
3.5.4 A03	CTS Table 4.1-2 Sampling Tests 3 Note 8 states, in part, that RWST boron concentration sample is required after adjusting tank contents. ITS SR 3.5.4.2 does not retain this requirement. This changes the CTS by not stating that the boron concentration sample is required after adjusting tank contents.	SR 3.5.4.2	Table 4.1-2 Sampling Tests 3 Note 8

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.1 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.6.1	3.6.a, 1.0.g.1, 1.0.g.2, 1.0.g.4, 1.0.g.5, 4.4.a, 4.4.b, 4.4.e, Table 4.1-3 Equipment Test 12, including footnote 1
3.6.1 A02	CTS 3.6.a states, in part, that "CONTAINMENT SYSTEM INTEGRITY shall not be violated." ITS 3.6.1 states "Containment shall be OPERABLE." This changes the CTS by deleting the specific CONTAINMENT SYSTEM INTEGRITY definition and all references to it and making a positive statement concerning the Containment OPERABILITY requirement.	LCO 3.6.1	3.6.a
3.6.1 A03	CTS 4.4.a provides a one-time change to the normal; 10 year Type A test frequency specified in NEI-94-01, Rev. 0. This change applies only to the interval following the Type A test performed in April 1994, and allows a one-time, 15 year frequency. ITS SR 3.6.1.1 does not include this one-time change to the test frequency. This changes the CTS by deleting this one-time test frequency change allowance.	None	4.4.a
3.6.2 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.6.2	3.6.a, 1.0.g.3, 4.4.b
3.6.2 A02	CTS 3.6.a states, in part, that "CONTAINMENT SYSTEM INTEGRITY shall not be violated." CTS 1.0.g provides the definition of CONTAINMENT SYSTEM INTEGRITY, and includes as part of CTS 1.0.g.3 that at least one door in both the personnel and the emergency air locks is properly closed. Furthermore, CTS 4.4.b requires air lock leakage rate testing to be performed, with the leakage rate limits provided in CTS 6.20. Thus, it can be concluded that the containment air locks are part of CONTAINMENT SYSTEM INTEGRITY. ITS 3.6.2 states "Two containment air locks shall be OPERABLE." This changes the CTS by placing the Containment air locks OPERABILITY requirements in a separate Technical Specification.	LCO 3.6.2, including Applicability	3.6.a
3.6.2 A03	CTS 4.4.b requires air lock leakage rate testing in accordance with the Containment Leakage Rate Testing Program. ITS SR 3.6.2.1 requires a similar test, but is modified by Note 1, which states "An inoperable air lock door does not invalidate the previous successful performance of the overall air lock leakage test." This changes the CTS by adding a Note stating that either air lock door is capable of providing a fission product barrier in the event of a DBA.	SR 3.6.2.1 Note 1	4.4.b

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.2 A04	CTS 4.4.b requires air lock leakage rate testing in accordance with the Containment Leakage Rate Testing Program. ITS SR 3.6.2.1 requires a similar test, but is modified by Note 2, which states that results shall be evaluated against acceptance criteria applicable to SR 3.6.1.1. This changes the CTS by adding a Note as a reminder that the air lock leakage must be accounted for in determining the combined Type B and C containment leakage rate.	SR 3.6.2.1 Note 2	4.4.b
3.6.3 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.6.3	3.6.b, 4.4.b, 4.4.e, 4.4.f, Table TS 4.1-3 Equipment Tests 4 and 16 (including footnotes 1 and 8), 6.20
3.6.3 A02	CTS 3.6.b.1 requires the containment isolation valves to be OPERABLE when CONTAINMENT SYSTEM INTEGRITY is required. ITS 3.6.3 requires the containment isolation valves to be OPERABLE in MODES 1, 2, 3, and 4. This changes the CTS by clearly specifying when the containment isolation valves are required to be OPERABLE, in lieu of referencing the applicability of another specification.	3.6.3 Applicability	3.6.b.1
3.6.3 A03	CTS 3.6.b.3 does not specifically require Conditions to be entered for systems supported by inoperable containment isolation valves. OPERABILITY of supported systems is addressed through the definition of OPERABILITY for each system, and appropriate LCO Actions are taken. ITS 3.6.3 ACTIONS Note 3 states "Enter applicable Conditions and Required Actions for system(s) made inoperable by containment isolation valves." ITS LCO 3.0.6 provides an exception to ITS LCO 3.0.2, stating "When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered." This changes the CTS by adding a specific statement to require supported system Conditions and Required Actions be entered, whereas in the CTS this would be done without the Note.	3.6.3 ACTIONS Note 3	3.6.b.3

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.3 A04	CTS 3.6.b.3 does not include a reference to entering applicable Actions of the CONTAINMENT SYSTEM INTEGRITY LCO (CTS 3.6.a) (changed to containment OPERABILITY in the ITS). ITS 3.6.3 ACTIONS Note 4 states "Enter applicable Conditions and Required Actions of LCO 3.6.1, "Containment," when isolation valve leakage results in exceeding the overall containment leakage rate acceptance criteria." This changes the CTS by explicitly stating an existing requirement that the Containment Specification Actions be taken when the Containment LCO is not met as a result of containment isolation valve leakage exceeding limits.	3.6.3 ACTIONS Note 4	3.6.b.3
3.6.3 A05	When a containment isolation valve is inoperable, CTS 3.6.b.3.A.1, 3.6.b.3.B.1, and 3.6.b.3.C.1 provide an option to return the inoperable containment isolation valves to OPERABLE status. ITS 3.6.3 ACTIONS A, B, and C do not include this explicit option to restore the valves to OPERABLE status. This changes the CTS by not explicitly stating the requirement to restore the valves to OPERABLE status.	None	3.6.b.3.A.1, 3.6.b.3.B.1, 3.6.b.3.C.1
3.6.4 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.6.4	3.6.d
3.6.4 A02	CTS 3.6.d provides actions to be taken if the internal pressure of the reactor containment vessel exceeds 2 psi, but does not provide an actual LCO type of statement. ITS LCO 3.6.4 requires the containment pressure to be > 0.0 psig and < 2.0 psig. This changes the CTS by clearly stating the limiting condition for operation in a separate statement. The change related to the minimum containment pressure is discussed in DOC M01.	LCO 3.6.4	3.6.d
3.6.5 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.6.5	3.6.e
3.6.6 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.6.6	3.3.c.1, 4.5.a.2, 4.5.a.3, 4.5.b.1,

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.6 A02	CTS 3.3.c.1.A.3.(i) states, in part, one containment fancoil unit train may be out of service for 7 days provided the opposite containment fancoil unit train remains OPERABLE. CTS 3.3.c.1.A.3.(ii) states, in part, one containment spray train may be out of service for 72 hours provided the opposite containment spray train remains OPERABLE. ITS 3.6.6 does not maintain the requirement that the opposite containment cooling train (equivalent to CTS containment fancoil unit trains) and/or the containment spray train remain OPERABLE. This changes the CTS by deleting the explicit statement that the opposite train must remain OPERABLE.	None	3.3.c.1.A.3.(i), 3.3.c.1.A.3.(ii)
3.6.6 A03	CTS 3.3.c.1.A.3.(iii) states, in part, one containment fancoil unit train and one containment spray train may be out of service for 72 hours provided the opposite containment fancoil unit and containment spray train remains OPERABLE. ITS 3.6.6 does not maintain this Action. This changes the CTS by not requiring the action to verify the opposite train is OPERABLE.	None	3.3.c.1.A.3.(iii)
3.6.6 A04	CTS 3.3.c.1 does not provide an Action for two containment spray trains inoperable or for two containment cooling trains inoperable. Thus, CTS 3.0.c would be required to be entered. ITS 3.6.6 ACTION F requires immediate entry into ITS LCO 3.0.3 when two containment spray trains are inoperable or two containment cooling trains are inoperable for reasons other than Condition D. This changes the CTS by providing an explicit ACTION for two inoperable containment spray trains and for certain conditions with two containment cooling trains inoperable.	3.6.6 ACTION F	3.0.c
3.6.6 A05	CTS 4.5.a.2.A states, in part, that the containment spray system test shall be performed once per operating cycle or once every 18 months, whichever occurs first. ITS SR 3.6.6.6 requires verification that each containment spray pump starts automatically on an actual or simulated actuation signal every 18 months and ITS SR 3.6.6.5 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 on an actual or simulated actuation signal. CTS 4.5.a.3 states, in part, that the containment fancoil units shall be tested once per operating cycle or once every 18 months, whichever occurs first. ITS SR 3.6.6.7 requires verification that each containment cooling train starts automatically on an actual or simulated actuation signal every 18 months. This changes the CTS by deleting the "once per operating cycle" terminology. The change discussion regarding the use of an actual or simulated test signal is located in DOC L02.	SR 3.6.6.6, SR 3.6.6.5, SR 3.6.6.7	4.5.a.2.A, 4.5.a.3

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.6 A06	CTS 4.5.a.2.C states, in part, that the Containment Vessel Internal Spray System test will be considered satisfactory if control board indication or visual observations indicate all components have operated satisfactorily. ITS SR 3.6.6.5 and SR 3.6.6.6 do not include this statement. This changes the CTS by deleting the specific method of verifying Surveillances.	SR 3.6.6.5, SR 3.6.6.6	4.5.a.2.c
3.6.7 A01 3.6.7 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.6.7	3.3.c.2, 4.5.b.2.D
3.6.7 A02	CTS 4.5.b.2.D requires the spray additive tank valves shall be tested during each major REFUELING outage. ITS SR 3.6.7.4 requires verification that each spray additive automatic valve in the flow path that is not locked sealed or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal. This changes the CTS by changing the statement "major REFUELING outage" to 18 months.	SR 3.6.7.4	4.5.b.2.D
3.6.8 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.6.8	3.6.a, 1.0.g.2, 4.4.c.4
3.6.8 A02	CTS 3.6.a states, in part, that "CONTAINMENT SYSTEM INTEGRITY shall not be violated." CTS 1.0.g provides the definition of CONTAINMENT SYSTEM INTEGRITY, and includes as part of CTS 1.0.g.2 that the shield building equipment hatches must be closed. CTS 5.2.a.2 also states that the Containment System includes a concrete shield building (CTS 5.2.a.2.B). Thus, it can be concluded that the shield building is part of CONTAINMENT SYSTEM INTEGRITY. ITS 3.6.8 states "The shield building shall be OPERABLE." This changes the CTS by placing the Shield Building OPERABILITY requirements in a separate Technical Specification. See also ITS 3.6.1 and ITS 3.6.2 for further discussions of the CONTAINMENT SYSTEM INTEGRITY.	LCO 3.6.8, including Applicability	3.6.a

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.9 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.6.9	3.6.a, 4.4.e, Table TS 4.1-1 Channel Description 18.d
3.6.9 A02	CTS 3.6.a states, in part, that "CONTAINMENT SYSTEM INTEGRITY shall not be violated." CTS 5.2.a.2 states that the Containment System includes the steel reactor containment vessel (CTS 5.2.a.2.A). CTS 5.2.b.1 further states that the reactor containment vessel is designed to withstand an external pressure 0.8 psi greater than the internal pressure. Furthermore, CTS Section 4.4, which provides the Surveillances for the Containment Systems, includes a Surveillance on the Containment Vacuum Breaker System (CTS 4.4.e). Since the vacuum relief lines and associated valves are the design feature that ensures this pressure limitation is met, it can be concluded that the vacuum relief lines are part of CONTAINMENT SYSTEM INTEGRITY. ITS 3.6.9 states "Two vacuum relief lines shall be OPERABLE." This changes the CTS by placing the vacuum relief lines OPERABILITY requirements in a separate Technical Specification. See also ITS 3.6.1 and ITS 3.6.2 for further discussion of CONTAINMENT SYSTEM INTEGRITY.	LCO 3.6.9, including Applicability	3.6.a
3.6.9 A03	CTS 4.4.e requires, in part, that the power-operated valve (i.e., the butterfly valve) in each vent line to be tested during each refueling outage. ITS SR 3.6.9.1 requires a similar test once each refueling outage. This changes the CTS by changing the Frequency from each refueling outage to 18 months.	SR 3.6.9.1	4.4.e
3.6.10 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.6.10	3.6.c, 3.6.c.1, 1.0.g.6, 4.4.c.1, 4.4.c.3, 4.4.c.2.d
3.6.10 A02	CTS 3.6.c states, in part, that both trains of the Shield Building Ventilation System (SBVS) shall be OPERABLE whenever CONTAINMENT SYSTEM INTEGRITY, as defined by TS 1.0.g, is required. The ITS 3.6.10 Applicability for the SBVS is MODES 1, 2, 3, and 4. This changes the CTS by stating the specific MODE of Applicability.	3.6.10 Applicability	3.6.c

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.10 A03	CTS 4.4.c.1.b requires demonstration of automatic initiation of each train of the system at least once per operating cycle or once every 18 months, whichever occurs first. ITS SR 3.6.10.3 requires verification that each SBVS train actuates on an actual or simulated actuation signal every 18 months. This changes the CTS by deleting the "once per operating cycle" terminology. The change discussion regarding the use of an actual or simulated test signal is located in DOC L01.	SR 3.6.10.3	4.4.c.1.b
3.6.10 A04	CTS 4.4.c.1.a, CTS 4.4.c.2, and CTS 4.4.c.3 provide filter testing requirements for the SBVS. ITS SR 3.6.10.2 requires performance of SBVS filter testing in accordance with the Ventilation Filter Testing Program (VFTP) at a frequency in accordance with the VFTP. CTS 4.4.c does not include a VFTP, but the requirements that make up the VFTP are being moved to ITS 5.5. This changes the CTS by requiring testing in accordance with the VFTP, whose requirements are being moved to ITS 5.5.	SR 3.6.10.2	4.4.c.1.a, 4.4.c.2, 4.4.c.3
3.7.1 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.7.1	3.4.a
3.7.1 A02	CTS 3.4.a.1 states that the Reactor Coolant System shall not be heated to > 350ºF (ITS MODE 3) unless a minimum of two MSSVs per steam generator are OPERABLE. CTS 3.4.a.2 states that the reactor shall not be made critical (ITS MODES 1 and 2) unless five MSSVs per steam generator are OPERABLE. ITS LCO 3.7.1 requires five MSSVs per steam generator to be OPERABLE in MODES 1, 2, and 3. In addition, when less then five MSSVs per steam generator are OPERABLE but at least two MSSVs per steam generator are OPERABLE, ITS 3.7.1 ACTION B only requires a power reduction to as low as 19% RTP. Thus, as long as two MSSVs per steam generator are OPERABLE, the unit is allowed to remain at a THERMAL POWER of at least 19% RTP. This changes the CTS by combining both current LCO requirements into a single requirement, and placing the unit in an ACTION (in lieu of meeting the LCO statement) when less than five but at least two MSSVs per steam generator are OPERABLE. The change from MODE 3 to 19% RTP is discussed in DOC L01.	LCO 3.7.1, including Applicability	3.4.a.1, 3.4.a.2

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.1 A03	CTS 3.4.a.2 states, in part, that the reactor cannot be made critical with less than five MSSVs per steam generator. CTS 3.4.a.3 allows 48 hours to return 5 MSSVs to OPERABLE status. ITS 3.7.1 ACTIONS Note states "Separate Condition entry is allowed for each MSSV." This changes the CTS by explicitly specifying separate condition entry for each inoperable MSSV.	3.7.1 ACTIONS Note	3.4.a.2, 3.4.a.3
3.7.2 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.7.2	3.6.b, 3.6.b.1, 3.6.b.3, 3.6.b.3.C, 3.6.b.4, 4.7
3.7.2 A02	CTS 3.6.b requires the containment isolation valves to be OPERABLE. ITS 3.7.2 requires the MSIVs to be OPERABLE. This changes the CTS by placing the MSIVs into a separate Specification, and not include it as part of the containment isolation specification.	LCO 3.7.2	3.6.b
3.7.2 A03	CTS 3.6.b.3 states, in part, that separate entry is allowed into TS 3.6.b.3 for each "penetration flowpath." ITS 3.7.2 Condition C Note states that separate Condition entry is allowed for each "MSIV." This changes the CTS by explicitly specifying separate condition entry for each inoperable MSIV.	3.7.2 Condition C Note	3.6.b.3
3.7.3 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.7.3	3.6.b, 3.6.b.1, 3.6.b.3, 3.6.b.3.A, 3.6.b.3.A.1, 3.6.b.3.A.2, 3.6.b.4
3.7.3 A02	CTS 3.6.b requires the containment isolation valves to be OPERABLE. ITS 3.7.3, in part, requires the MFIVs to be OPERABLE. This changes the CTS by placing the MFIVs into a Specification with the other main feedwater isolation valves (MFIVs); i.e., the MFRVs and MFRV bypass valves.	LCO 3.7.3	3.6.b
3.7.3 A03	CTS 3.6.b.3 states, in part, that separate entry is allowed into TS 3.6.b.3 for each "penetration flowpath." ITS 3.7.3 ACTIONS Note states that separate Condition entry is allowed for each "valve." This changes the CTS by explicitly specifying separate condition entry for each inoperable MFIV.	3.7.3 ACTIONS Note	3.6.b.3

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.3 A04	When one or more of the MFIVs are inoperable, CTS 3.6.b.3.A requires restoring the inoperable valve to OPERABLE status within 24 hours or taking one of the other specified compensatory actions. ITS 3.7.3 does not state the requirement to restore an inoperable isolation valve to OPERABLE status, but includes other compensatory Required Actions to take within 72 hours or 8 hours, as applicable. This changes the CTS by not explicitly stating the requirement to restore an inoperable valve to OPERABLE status. The change in the time allowed to meet the compensatory Required Actions (72 hours and 8 hours) is discussed in DOCs L03 and M01).	None	3.6.b.3.A
3.7.5 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.7.5	3.4.b, 4.8, Table TS 4.1-1 Channel Descriptions 43 and 46
3.7.5 A02	The ITS 3.7.5 ACTIONS include a Note that states LCO 3.0.4.b is not applicable. CTS 3.4.b does not include this Note. This changes the CTS by including the ACTION Note.	3.7.5 ACTIONS Note	None
3.7.5 A03	CTS 4.8.a requires that the motor-driven auxiliary feedwater pumps are demonstrated OPERABLE quarterly during power operation. CTS 4.8.b requires that the turbine-driven auxiliary feedwater pump is demonstrated OPERABLE quarterly during power operation. ITS 3.7.5.2 provides the Surveillance Frequency in accordance with the Inservice Testing Program. This changes the CTS by changing the Surveillance Frequency from quarterly to in accordance with the Inservice Testing Program.	SR 3.7.5.2	4.8.a, 4.8.b
3.7.5 A04	CTS 4.8.e states, in part, that all of the tests performed in CTS 4.8 are considered satisfactory if control board indication or visual observation of the equipment demonstrates that all components have operated properly. ITS 3.7.5 does not contain this statement. This changes the CTS by deleting the specific method of verifying Surveillances.	None	4.8.e
3.7.6 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.7.6	3.4.c

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.7 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.7.7	3.3.d
3.7.7 A02	The Action for CTS 3.3.d.2 allows 72 hours to restore an inoperable CC train to OPERABLE status. ITS 3.7.7 ACTION A has this same requirement; however one Note has been included. The ITS 3.7.7 Required Action A.1 Note requires entry into the applicable Conditions and Required Actions of LCO 3.4.6, "RCS Loops - MODE 4," for residual heat removal loops made inoperable by CC System. This changes the CTS by explicitly specifying the applicable Conditions and Required Actions of ITS LCO 3.4.6 must be entered.	3.7.7 Required Action A.1 Note	3.3.d.2
3.7.8 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.7.8	3.3.e, Table TS 3.5-1 Functional Unit 7, Table TS 4.1-1 Channel Description 30
3.7.10 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.7.10	3.12.a, 3.12.b, 4.17.a, 4.17.a.2, 4.17.b.4
3.7.10 A02	CTS 4.17.a states, in part, that the control room post-accident recirculation tests shall be performed once per operating cycle or once per 18 months, whichever occurs first. ITS SR 3.7.10.3 requires verification that each CRPAR train actuates on an actual or simulated actuation signal every 18 months. This changes the CTS by deleting the "once per operating cycle" terminology. The change discussion regarding the use of an actual or simulated test signal is located in DOC L02.	SR 3.7.10.3	4.17.a
3.7.10 A03	CTS 4.17.a.1, 4.17.b.1, 4.17.b.2, and 4.17.b.3 provide filter testing requirements for the CRPAR System. ITS SR 3.7.10.2 requires performing required CRPAR System filter testing in accordance with the Ventilation Filter Testing Program (VFTP). CTS 4.17 does not include a VFTP, but the requirements that make up the VFTP are being moved to ITS 5.5. This changes the CTS by requiring testing in accordance with the VFTP, whose requirements are being moved to ITS 5.5.	SR 3.7.10.2	4.17.a.1, 4.17.b.1, 4.17.b.2, 4.17.b.3

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.12 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.7.12	3.6.c, 3.6.c.2, 1.0.g.6, 4.4.d, 4.4.c.1, 4.4.c.1.b
3.7.12 A02	CTS 3.6.c states, in part, that both trains of the Auxiliary Building Special Ventilation (ASV) System shall be OPERABLE when CONTAINMENT SYSTEM INTEGRITY, as defined by TS 1.0.g, is required. The ITS 3.7.12 Applicability for the ASV System is MODES 1, 2, 3, and 4. This changes the CTS by stating the specific MODE of Applicability in lieu of referencing the Applicability of another Specification.	3.7.12 Applicability	3.6.c
3.7.12 A03	CTS 4.4.d.1 requires, in part, that ASV periodic tests be performed in accordance with CTS 4.4.c.1 through 4.4.c.3 except for CTS 4.4.c.2.d. CTS 4.4.c.1 states that "At least once per operating cycle or once every 18 months, whichever occurs first, the following conditions shall be demonstrated:". ITS (i.e., SR 3.7.12.3) requires periodic tests for the applicable requirement to be performed every 18 months. This changes the CTS by deleting the "once per operating cycle" and whichever occurs first" terminology.	SR 3.7.12.3	4.4.d.1, 4.4.c.1
3.7.12 A04	CTS 4.4.d, in part, requires the periodic test of CTS 4.4.c.1.a, 4.4.c.2.a, 4.4.c.2.b, 4.4.c.2.c, and 4.4.c.3 to be performed. CTS 4.4.c.1.a, 4.4.c.2.a, 4.4.c.2.b, 4.4.c.2.c, and 4.4.c.3 provide filter testing requirements for the ASV System. ITS SR 3.7.12.2 requires performance of Auxiliary Building Special Ventilation (AVS) System filter testing in accordance with the Ventilation Filter Testing Program (VFTP) at a frequency in accordance with the VFTP. CTS 4.4.c does not include a VFTP, but the requirements that make up the VFTP are being moved to ITS 5.5. This changes the CTS by requiring testing in accordance with the VFTP, whose requirements are being moved to ITS 5.5.	SR 3.7.12.2	4.4.d
3.7.14 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.7.14	5.4.a.3, Table TS 4.1-2 Sampling Test 6
3.7.15 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.7.15	5.4.c, Figure TS 5.4-1

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.15 A02	CTS 5.4.c does not provide any specific Applicability requirements for the storage of fuel assemblies in the canal rack portion of the spent fuel pool or any other portions of the spent fuel pool. ITS 3.7.15 requires the spent fuel pool storage requirements to be met whenever any fuel assembly is stored in the spent fuel pool. This changes the CTS by adding an explicit Applicability statement to address when the spent fuel pool storage requirements are required.	3.7.15 Applicability	None
3.7.16 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.7.16	3.4.d, Table TS 4.1-2 Sampling test 7
CTS 3.14 A01	In the conversion of the Kewaunee Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	None	3.14
3.8.1 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.8.1	3.7.a, 3.7.a.1, 3.7.a.2, 3.7.a.7, 3.7.a.8, 3.7.b, 3.7.b.1, 3.7.b.2, 3.7.b.4, 3.7.b.5, 3.7.b.7, 3.7.c, 4.6.a, Table TS 4.1-1 Channel Description 26, Table TS 4.1-3 Equipment Test 9, including footnotes (1) and (5)
3.8.1 A02	The ITS 3.8.1 ACTIONS include a Note that states LCO 3.0.4.b is not applicable to the diesel generators (DGs). The CTS does not include this Note. This changes the CTS by including the ACTION Note.	3.8.1 ACTIONS Note	None

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 A03	CTS 3.7.b does not contain an Action for more than one offsite circuit inoperable concurrent with two DGs inoperable. Thus, having more than one offsite circuit inoperable concurrent with two DGs inoperable requires entering CTS 3.0.c. ITS 3.8.1 ACTION G requires entering LCO 3.0.3 immediately if three or more AC sources are inoperable. Changes related to two inoperable offsite circuits are discussed in DOC L03. This changes the CTS by adding a specific ACTION requiring entry into LCO 3.0.3 when three offsite circuits are inoperable.	3.8.1 ACTION G	3.0.c
3.8.1 A04	CTS 4.6.a.1.B requires the DG to be loaded for ≥ 60 minutes. ITS SR 3.8.1.3 requires a similar test, but includes Note 1, which states that DG loading may include gradual loading as recommended by the manufacturer. This changes the CTS by adding an explicit Note that states DG loadings may include gradual loading as recommended by the manufacturer.	SR 3.8.1.3 Note 1	4.6.a.1.B
3.8.1 A05	CTS Table TS 4.1-3 Equipment Test 9 requires a Fuel Inventory check on the DG fuel supply. The test is modified by Note 1, which states that following maintenance on equipment that could affect the operation of the equipment, tests should be performed to verify OPERABILITY. ITS SR 3.8.1.4 requires a similar verification on the day tanks, but is not modified by a similar Note. This changes the CTS by deleting the Note requirement.	SR 3.0.1	Table TS 4.1-3 Equipment Test 9 footnote (1)
3.8.1 A06	CTS Table TS 4.1-3, Note 5, requires verification of diesel fuel inventory in all plant modes. CTS 3.7.a.7.a requires fuel oil inventory in the day tanks to support DG OPERABILITY. ITS SR 3.8.1.4 requires the day tanks stored fuel oil level to be within limits when the associated DG is required OPERABLE (i.e., MODES 1, 2, 3, and 4 for ITS LCO 3.8.1 and MODES 5, 6, and during movement of irradiated fuel for ITS LCO 3.8.2. This changes the CTS by removing a potential conflict between two CTS statements.	SR 3.8.1.4	Table TS 4.1-3 footnote (5), 3.7.a.7.a
3.8.3 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.8.3	3.7.a, 3.7.a.7.B, 4.1.b, Table TS 4.1-3 Equipment Test 9, including footnotes (1) and (5)

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.3 A02	CTS 3.7.a.7 states the requirements for the diesel generators (DGs), and includes a stored diesel fuel oil limit. CTS Table TS 4.1-3 Equipment Test 9 provides a Surveillance Requirement for the stored diesel fuel oil. Thus the stored diesel fuel oil limit is covered by CTS 3.7.a.7. ITS LCO 3.8.3 states, in part, that the stored diesel fuel oil shall be within limits for each required DG. The requirements for the DGs are included in ITS 3.8.1 and 3.8.2. This changes the CTS by dividing the requirements for the DGs and the diesel fuel oil into separate Specifications.	LCO 3.8.3	3.7.a.7, Table TS 4.1-3 Equipment Test 9
3.8.3 A03	CTS Table TS 4.1-3 Equipment Test 9 requires a Fuel Inventory check on the DG fuel supply. The test is modified by Note 1, which states that following maintenance on equipment that could affect the operation of the equipment, tests should be performed to verify OPERABILITY. ITS SR 3.8.3.1 requires a similar verification, but does not include the Note concerning following maintenance that affects operation of the equipment. This changes the CTS by deleting the Note requirement.	SR 3.0.1	Table TS 4.1-3 Equipment Test 9 footnote (1)
3.8.3 A04	CTS Table TS 4.1-3, Note 5, requires verification of diesel fuel oil inventory in all plant modes. CTS 3.7.a.7 requires a specific fuel oil inventory to support DG OPERABILITY. ITS 3.8.3 requires stored fuel oil to be within limits when the associated DG is required to be OPERABLE. This changes the CTS by removing a potential conflict between two CTS statements.	LCO 3.8.3	Table TS 4.1-3 Equipment Test 9 footnote (5)
3.8.4 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.8.4	3.7.a, 3.7.a.6, 3.7.b, 3.7.b.3
3.8.6 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.8.6	3.7.a, 3.7.a.6, 3.7.b, 3.7.b.3, 4.6.b
3.8.6 A02	CTS 3.7.a.6, in part, requires the batteries to be OPERABLE. CTS 4.6.b provides Surveillance Requirements for various battery parameters. Thus, the battery parameter requirements are covered by CTS 3.7.a.6. ITS 3.8.6 requires the battery parameters to be within limits. The requirements for the batteries are included in ITS 3.8.4 and ITS 3.8.5. This changes the CTS by dividing the requirements for the batteries and the requirements for battery parameters into separate Specifications.	LCO 3.8.6	3.7.a.6

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.6 A03	CTS 4.6.b.4 requires performance of a "load test" (i.e., a "performance discharge test" in the ITS) during the "first REFUELING." ITS SR 3.8.6.6 requires the battery capacity to be verified, however it does not explicitly include a Frequency of "during the first Refueling." This changes the CTS by deleting a specific time for performing the Surveillance.	SR 3.8.6.6	4.6.b.4
3.8.9 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.8.9	3.7.a, 3.7.a.3, 3.7.a.4, 3.7.a.5, 3.7.a.6, 3.7.b, 3.7.b.6
3.8.9 A02	CTS 3.7.a.6 requires both station batteries and both DC systems to be OPERABLE, however the CTS does not explicitly require the DC distribution buses to be OPERABLE. ITS LCO 3.8.9, in part, requires the Train A and B DC electrical power distribution subsystems to be OPERABLE. This changes the CTS by specifying the requirements for DC distribution buses.	LCO 3.8.9	3.7.a.6
3.8.9 A03	CTS 3.7.b.6 allows a 24 hour restoration time when a 4160V or 480 V ESF bus is inoperable, provided the redundant bus "and its loads" remain OPERABLE. Under similar conditions (inoperable AC buses), the ITS 3.8.9 ACTIONS do not specifically include a provision that the loads on the redundant buses must be OPERABLE. This changes the CTS by deleting a specific requirement that loads on redundant buses be OPERABLE when an AC bus is inoperable.	None	3.7.b.6
3.8.10 A01	The CTS does not contain any specific OPERABILITY requirements for the Distribution Systems during shutdown conditions. However, the CTS 1.0.e definition of OPERABLE requires that, for all equipment required to be OPERABLE, "all necessary attendant ... normal and emergency electrical power sources ... that are required for the system or component to perform its required function is also capable of performing their related support function." ITS LCO 3.8.10 requires the necessary portions of the AC, DC, and AC instrument bus electrical power distribution subsystem to be OPERABLE to support equipment required to be OPERABLE in MODES 5 and 6 and during movement of irradiated fuel assemblies. If one or more required electrical power distribution subsystems are inoperable, ITS 3.8.10 ACTION A must be entered and the associated supported required features(s) must be declared inoperable or certain activities must be suspended (movement of irradiated fuel assemblies and operations involving positive reactivity additions that could result in loss of required SDM or boron concentration), action must be initiated to restore the inoperable distribution subsystem, and the required residual heat removal	LCO 3.8.10, including Applicability, 3.8.10 ACTION A	1.0.e

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.10 A01 (continued)	subsystem(s) must be declared inoperable and not in operation. This changes the CTS by adding the explicit requirements of ITS LCO 3.8.10 and ITS 3.8.10 ACTION A.	LCO 3.8.10, including Applicability, 3.8.10 ACTION A	1.0.e
3.9.1 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.9.1	3.8.a, 3.8.a.5, 3.8.b, Table TS 4.1-2 Sampling Test 2, including footnotes (3) and (6)
3.9.1 A02	CTS Table TS 4.1-2 Sample Test 2 footnote (3) states that the boron concentration test is required in all plant modes. CTS Table TS 4.1-2 Sample Test 2 footnote (6) states that a reactor coolant boron concentration sample does not have to be taken when the core is completely unloaded. ITS 3.9.1 is applicable in MODE 6. This changes the CTS by specifically stating that the Applicability is in MODE 6. In addition, ITS 3.1.1, "SHUTDOWN MARGIN (SDM)" discusses the remaining plant modes.	3.9.1 Applicability	Table TS 4.1-2 Sampling Test 2 footnotes (3) and (6)
3.9.1 A03	CTS 5.4.a.3, in part, requires the spent fuel pool boron concentration to match that used in the reactor refueling cavity and refueling canal during REFUELING OPERATIONS. CTS 3.8.a.5 provides the boron concentration limit for the RCS during fuel movement, and states that the limit is specified in the COLR. ITS 3.9.1, in part, requires the boron concentration of the spent fuel pool to be within the limit specified in the COLR during MODE 6 operations (which encompass refueling operations), but a NOTE to the Applicability limits this requirement to only when the spent fuel pool is connected to the RCS. This changes the CTS by clearly stating when the spent fuel pool limit is to be maintained consistent with the RCS limit.	3.9.1 Applicability	5.4.a.3
3.9.2 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.9.2	3.8.a, 3.8.a.3, 3.8.b, Table TS 4.1-1 Channel Description 3
3.9.2 A02	CTS 3.8.a.3, in part, states core subcritical neutron flux shall be "continuously monitored" by at least two neutron monitors and at least one neutron flux monitor shall be "in service". ITS LCO 3.9.2 requires two source range neutron flux monitors to be OPERABLE and one source range audible count rate circuit to be OPERABLE. This changes the CTS by requiring the source range neutron flux monitors to be OPERABLE, instead of only "continuously monitored" or "in service".	LCO 3.9.2	3.8.a.3

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.2 A03	When the neutron monitors are not in the required condition specified in CTS 3.8.a.3, CTS 3.8.b requires refueling of the reactor to cease, initiation of action to restore the neutron monitors to the required conditions, and no operations be performed that could increase the reactivity of the core. Under similar conditions, ITS 3.9.2 ACTION A only requires the suspension of positive reactivity additions. This changes the CTS by deleting the requirements to initiate action to restore the neutron monitors to the required conditions.	3.9.2 ACTION A	3.8.a.3, 3.8.b
3.9.2 A04	Remark (c) to CTS Table TS 4.1-1, Channel Description 3, requires the Channel Check of the nuclear source range instrumentation to be performed in all plant modes. ITS 3.9.2 is only Applicable in MODE 6. This changes the CTS by only including the MODE 6 requirement in this Specification. ITS 3.3.1 will describe changes to this requirement in all other plant modes.	3.9.2 Applicability	Table 4.1-1 Channel Description 3, Remark (c)
3.9.3 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.9.3	3.1.a.1.A, 3.1.a.2.B, 3.8.a, 3.8.a.4, 3.8.b
3.9.3 A02	CTS 3.1.a.2.B, which requires one RHR train to be OPERABLE (see DOC A03), is applicable whenever the average reactor coolant temperature is ≤ 200ºF and irradiated fuel is in the reactor. ITS 3.9.3, which also includes similar RHR train OPERABILITY requirements, is applicable in MODE 6 with the water level ≥ 23 ft above the top of the reactor vessel flange. RHR requirements in MODE 5 are provided in LCO 3.4.7 and LCO 3.4.8 and the MODE 6 RHR requirements with the water level < 23 ft above the top of the reactor vessel flange are provided in LCO 3.9.4. This changes the CTS by splitting these RHR requirements into four separate LCOs.	3.9.3	3.1.a.2.B
3.9.3 A03	CTS 3.1.a.2.B requires two RHR trains to be OPERABLE. However, it provides an allowance that one RHR train may be inoperable for maintenance when in the REFUELING MODE (ITS MODE 6) with the water level ≥ 23 ft above the top of the reactor vessel flange. This essentially means that when in the REFUELING MODE with the water level ≥ 23 ft above the top of the reactor vessel flange, only one RHR train is required to be OPERABLE. ITS 3.9.3, in part, specifies that one RHR loop shall be OPERABLE in MODE 6 with the water level ≥ 23 ft above the top of the reactor vessel flange. This changes the CTS by clearly stating the LCO requirement when in MODE 6 with the water level ≥ 23 ft above the top of the reactor vessel flange.	LCO 3.9.3 and Applicability	3.1.a.2.B

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.3 A04	When the required RHR train is inoperable, CTS 3.1.a.2.B.2 essentially requires immediate action to be taken to restore the train to OPERABLE status. Furthermore, when a required RHR pump is inoperable, CTS 3.8.b, in part, essentially requires immediate suspension of loading fuel in the reactor. Under similar conditions, ITS 3.9.3 ACTION A requires an action similar to CTS 3.1.a.2.B.2 (Required Action A.3), and an action similar to CTS 3.8.b (Required Action A.2). This changes the CTS by including specific Required Actions applicable to the related conditions of CTS 3.1.a.2.B.2 and CTS 3.8.b. The addition of other Required Actions (A.1, A.4, A.5, and A.6) is discussed in DOC M02.	3.9.3 ACTION A	3.1.a.2.B.2, 3.8.b
3.9.3 A05	CTS 3.8.a.4 requires one RHR pump to be OPERABLE. As stated in CTS 3.8.a, this requirement is applicable during REFUELING OPERATIONS. ITS 3.9.3, which also requires an RHR loop to be OPERABLE, is applicable in MODE 6 with the water level ≥ 23 ft above the top of the reactor vessel flange. This changes the CTS by requiring an RHR loop to be OPERABLE at all times in MODE 6 with the water level ≥ 23 ft above the top of the reactor vessel flange, not just during REFUELING OPERATIONS.	3.9.3 Applicability	3.8.a.4
3.9.4 A01	In the In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.9.4	3.1.a.1.A, 3.1.a.2.B
3.9.4 A02	CTS 3.1.a.2.B, which requires two RHR trains to be OPERABLE, is applicable whenever the average reactor coolant temperature is ≤ 200ºF and irradiated fuel is in the reactor. ITS 3.9.4, which also includes similar RHR train OPERABILITY requirements, is applicable in MODE 6 with the water level < 23 ft above the top of the reactor vessel flange. RHR requirements in MODE 5 are provided in LCO 3.4.7 and LCO 3.4.8 and the MODE 6 RHR requirements with the water level ≥ 23 ft above the top of the reactor vessel flange are provided in LCO 3.9.3. This changes the CTS by splitting these RHR requirements into four separate LCOs.	LCO 3.9.4 and Applicability	3.1.a.2.B

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.4 A03	When one required RHR train is inoperable, CTS 3.1.a.2.B.2 requires immediate action to be taken to restore the train to OPERABLE status. Under similar conditions, ITS 3.9.4 ACTION A requires an action similar to CTS 3.1.a.2.B.2 (Required Action A.1), but also includes an additional action that can be taken. In lieu of performing ITS 3.9.4 Required Action A.1, ITS 3.9.4 Required Action A.2 requires immediate initiation of action to establish ≥ 23 ft of water above the top of the reactor vessel flange. This changes the CTS by adding a new Required Action to CTS 3.1.a.2.B.2.	3.9.4 ACTION A	3.1.a.2.B.2
3.9.5 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.9.5	3.8.a, 3.8.a.10, 3.8.b
3.9.6 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.9.6	3.8.a.1, 3.8.a.8, 3.8.b
3.9.6 A02	When the containment penetrations are not in the required condition specified in CTS 3.8.a.1 or CTS 3.8.a.8, CTS 3.8.b requires refueling of the reactor to cease, initiation of action to restore the containment penetrations to the required conditions, and no operations be performed that could increase the reactivity of the core. Under similar conditions, ITS 3.9.6 ACTION A only requires movement of irradiated fuel assemblies within containment to be suspended. This changes the CTS by deleting the requirements to initiate action to restore the containment penetrations to the required conditions and that no operations be performed that could increase the reactivity of the core.	3.9.6 ACTION A	3.8.b
CTS 3.8.a.12 A01	CTS 3.8.a.12 states "A licensed senior reactor operator will be on-site and designated in charge of the REFUELING OPERATIONS." The ITS does not include this requirement. This changes the CTS by deleting this requirement.	None	3.8.a.12
4.0 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	4.0	5.0, Table TS 4.1-3 Equipment Test 11

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
4.0 A02	CTS 5.4.a.1.a and 5.4.a.2.a states that the spent fuel storage racks and the new fuel storage racks, respectively, are designed and shall be maintained with the fuel assemblies having a maximum enrichment of 56.067 grams Uranium-235 per axial centimeter. ITS 4.3.1.1.a and 4.3.1.2.a states that the spent fuel storage racks and the new fuel storage racks, respectively, are designed and shall be maintained with the fuel assemblies having a maximum U-235 enrichment of 4.9776 weight percent. This changes the CTS by specifying the weight percent of the U-235 enrichment instead of the actual weight per axial centimeter.	4.3.1.1.a, 4.3.1.2.a	5.4.a.1.a, 5.4.a.2.a
5.1 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	5.1	6.1
5.2 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	5.2	6.1.a, 6.2, 6.3.b
5.2 A02	CTS 6.2.b.1.A and B, in part, require one shift manager (SRO) and two licensed reactor operators on duty at all times. CTS 6.2.b.2 states "When above COLD SHUTDOWN, the on-duty shift complement shall consist of the personnel required by TS 6.2.b.1 and an additional SRO." CTS 6.2.b.4 states "At least one licensed operator shall be in the control room when fuel is in the reactor." CTS 6.2.b.5 states, "Two licensed operators, one of which shall be an SRO, shall be present in the control room when the unit is in an operational MODE other than COLD SHUTDOWN or REFUELING." CTS 6.2.b.6 states "REFUELING OPERATIONS shall be directed by a licensed SRO assigned to the REFUELING OPERATION who has no other current responsibilities during the REFUELING OPERATION." The ITS does not include these requirements. This changes the CTS by deleting these requirements. A change to the number of licensed Operators required on duty is discussed in DOC L01.	None	6.2.b.1.A, 6.2.b.1.B, 6.2.b.2, 6.2.b.4, 6.2.b.5, 6.2.b.6

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.2 A03	CTS 6.2.d states that changes not affecting safety may be made to the off-site and facility organizations and that such changes that are described in the Technical Specifications shall be reported to the NRC in the form of an application for license amendment within 60 days of the implementation of the change. This allowance is not being maintained in the ITS. This changes the CTS by deleting an allowance to make certain changes to the CTS prior to actually receiving a Technical Specification change.	None	6.2.d
5.2 A04	CTS 6.3.b states that "The shift technical advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in the design of the Kewaunee Plant and plant transients. ITS 5.5.2.e states that "An individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift." This changes the CTS by referencing the Commission Policy Statement on Engineering Expertise on Shift for qualification requirements instead of specific qualifications.	5.2.2.e	6.3.b
5.3 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	5.3	6.3.a
5.3 A02	ITS 5.3.2 states "For the purpose of 10 CFR 55.4, a licensed Senior Operator and a licensed Operator are those individuals who, in addition to meeting the requirements of Specification 5.3.1, perform the functions described in 10 CFR 50.54(m)." The CTS does not include such a statement. This changes the CTS by clarifying the functions Senior Operators and Operators perform (i.e., those described in 10 CFR 50.54(m).	5.3.2	None
5.4 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	5.4	6.8, 6.16.a, 6.16.a.2, 6.16.a.3

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.5 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	5.5	1.0.o.2, 6.18, 6.12, 6.16.b, 4.2, 6.22, 6.15, 3.6.c.3, 3.12.c, 4.4.c.1, 4.4.c.1.a, 4.4.c.2.a, 4.4.c.2.b, 4.4.c.2.c, 4.4.c.3, 4.4.d.1, 4.17, 6.21, 6.20
5.5 A02	CTS 6.18.a states that the ODCM shall be approved by the Commission prior to implementation. ITS 5.5.1 does not retain this requirement. This changes the CTS by not requiring the Commission's approval prior to implementation.	None	6.18.a
5.5 A03	CTS 6.12 specifies the requirements for System Integrity, however there is no specific statement as to whether or not the provisions of CTS 4.0.b are applicable. ITS 5.5.2 states that the provisions of SR 3.0.2 are applicable to the Primary Coolant Sources Outside Containment Program Surveillance Frequencies. This changes the CTS by adding the allowance of ITS SR 3.0.2 to the Primary Coolant Sources Outside Containment Program.	5.5.2	6.12
5.5 A04	CTS 4.2.a.2 specifies the testing requirements for the in-service testing of ASME Code Class 1, Class 2, and Class 3 pumps and valves. As part of the Surveillance Requirement however, there is no statement whether the provisions of CTS 4.0.b and 4.0.c are applicable to CTS 4.2.a.2. Additionally, CTS 4.2.a.2 states, in part, that testing shall be performed in accordance with the ASME Code of Operation and Maintenance of Nuclear Power Plants, but no table providing a description of OM Code Frequency to Technical Specification Frequency is provided. ITS 5.5.6 adds specific reference to ITS SR 3.0.2 and ITS SR 3.0.3. Additionally, ITS 5.5.6 adds specific references for the Frequencies of the in-service testing activities. This changes the CTS by adding specific references and specific testing frequencies.	5.5.6	4.2.a.2

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.5 A05	The Surveillances associated with the ventilation filter testing for the Shield Building Ventilation System (SBVS), the Auxiliary Building Special Ventilation (ASV) System, and the Control Room Post Accident Recirculation (CRPAR) System have been placed in a program in the proposed Administrative Controls Chapter 5.0 (ITS 5.5.9). As such, a general program statement has been added as ITS 5.5.9. Also, a statement of the applicability of ITS SR 3.0.2 and SR 3.0.3 is needed to clarify that the allowances for Surveillance Frequency extensions do apply (as allowed in the CTS). This changes the CTS by moving the ventilation filter testing Surveillances associated with the SBVS, ASV System, and CRPAR System to a program in ITS 5.5 and specifically stating the applicability of ITS SR 3.0.2 and SR 3.0.3 in the program.	5.5.9	3.6.c.3, 3.12.c, 4.4.c.1, 4.4.c.1.a, 4.4.c.2.a, 4.4.c.2.b, 4.4.c.2.c, 4.4.c.3, 4.4.d.1, 4.17
5.5 A06	CTS 4.4.c.1.a, CTS 4.4.c.2, and CTS 4.4.c.3 provide filter testing requirements for the SBVS. CTS 4.4.d, in part, requires the periodic test of CTS 4.4.c.1.a, 4.4.c.2.a, 4.4.c.2.b, 4.4.c.2.c, and 4.4.c.3 to be performed. CTS 4.4.c.1.a, 4.4.c.2.a, 4.4.c.2.b, 4.4.c.2.c, and 4.4.c.3 provide filter testing requirements for the ASV System. CTS 4.17.a.1, 4.17.b.1, 4.17.b.2, and 4.17.b.3 provide filter testing requirements for the CRPAR System. ITS 5.5.9.d requires demonstration that the pressure drop across the combined HEPA filters and charcoal adsorber banks for the SBVS, the ASV System, and the Control Room Post-Accident Recirculation System once every 18 months. This changes the CTS by deleting the "once per operating cycle" terminology.	5.5.9.d	4.4.c.1.a, 4.4.c.2.a, 4.4.c.2.b, 4.4.c.2.c, 4.4.c.3, 4.17.a.1, 4.17.b.1, 4.17.b.2, 4.17.b.3
5.5 A07	CTS 4.4.c.3 contains a footnote which states: In WPS letter of August 25, 1976 to Mr. Al Schwencer (NRC) from Mr. E. W. James, we relayed test results for flow distribution for tests performed in accordance with ANSI N510-1975. This standard refers to flow distribution tests performed upstream of filter assemblies. Since the test results upstream of filters were inconclusive due to high degree of turbulence, tests for flow distribution were performed downstream of filter assemblies with acceptable results (within 20%). The safety evaluation attached to Amendment 12 references our letter of August 25, 1976 and acknowledges acceptance of the test results. ITS 5.5.9.e requires, in part, that demonstration for each of the specified safety related systems that when tested at the system design flowrate (± 10%), the air distribution is uniform within ± 20%. This changes the CTS by not including the footnote.	None	4.4.c.3 footnote

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.5 A08	CTS 6.20, Containment Leakage Rate Testing Program, requires the performance of containment leakage rate testing in accordance with 10 CFR 50 Appendix J Option B, except as modified by NRC-approved exemptions, and Regulatory Guide 1.163, dated September 1995. CTS 6.20 states that the provisions of Specification 4.0.b do not apply to the test frequencies in the Containment Leakage Rate Testing Program. ITS 5.5.14 does not include this provision. This changes the CTS by deleting the statement that the provisions of Specification 4.0.b are not applicable.	None	6.20
5.5 A09	The leakage rate acceptance criteria of CTS 6.20.c states, in part, that the personnel and emergency air lock leakage rates, when combined with the cumulative Type B and C leakage, shall be < 0.60 L_a. There is no separate leakage rate test for the airlock; only the individual door seals have a separate leakage limit. ITS 5.5.14 does not specify that the overall air lock leakage limit is part of the Types B and C limit. This changes the CTS by not specifically stating that the overall containment air locks leakage is part of the overall Types B and C limit.	5.5.14.d.1	6.20.c
5.6 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	5.6	6.9.a.4, 6.9.b.1, 6.9.b.2, 6.9.b.4
5.7 A01	In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	5.7	6.13

Table A – Administrative Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.7 A02	CTS 6.13.a applies for control of entry into high radiation areas in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr. CTS 6.13.b applies for control of entry into high radiation areas in which a major part of the body could receive a dose greater than 1000 mrem/hr and is clarified by Footnote (2) that measurement is made at 30 centimeters from the source of radioactivity. ITS 5.7.1 applies to controls for high radiation areas with dose rates not exceeding 1.0 rem/hour at 30 centimeters from the radiation source or from any surface penetrated by the radiation. ITS 5.7.2 applies to controls for 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/hr at one meter from a radiation source or any surface through which radiation penetrates. This changes the CTS by deleting the reference to a high radiation area having radiation intensity in excess of 100 mrem/hr and adds the criteria of, "at 30 centimeters from the radiation source or from any surface penetrated by the radiation" to the parameter 1000 mrem/hr.	5.7.1, 5.7.2	6.13.a, 6.13.b
CTS 6.0 A01	CTS 6.9.b.3 states, in part, that special reports may be required and that the special reports are required to be submitted to the NRC. The ITS does not requires these special reports to be prepared and submitted. This changes the CTS by deleting the references to the CTS Specifications requiring special reports. Justification for disposition of each of the special report requirements is addressed by the Discussion of Change for the respective ITS or CTS Specification.	None	6.9.b.3

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
1.0 L01	The CTS 1.0.i.2 definition of CHANNEL FUNCTIONAL TEST requires the use of a "simulated" signal when performing the test. ITS Section 1.1 renames the CTS definition to CHANNEL OPERATIONAL TEST (COT) as discussed in DOC A06. The ITS Section 1.1 COT 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	1.0.i.2	NA
2.0 L01	CTS 2.2.a requires the Reactor Coolant System (RCS) pressure not exceed 2735 psig with fuel assemblies installed in the reactor vessel. CTS 2.2.b.2 requires that if RCS pressure of 2735 psig is exceeded during HOT SHUTDOWN, INTERMEDIATE SHUTDOWN, COLD SHUTDOWN, or REFUELING, compliance be restored within 5 minutes. ITS 2.1.2 requires the RCS pressure be maintained ≤ 2735 psig in MODES 1, 2, 3, 4, and 5. ITS 2.2.2.2 requires compliance be restored within 5 minutes if in MODE 3, 4, or 5. This changes the CTS by only requiring the RCS pressure limit be met in MODES 1, 2, 3, 4, and 5, in lieu of all times when fuel assemblies are installed in the reactor vessel (i.e., deletes the requirement for compliance in REFUELING (equivalent to ITS MODE 6)).	2.1.2, 2.2.2.2	2.2.a, 2.2.b.2	2
3.1.1. L01	CTS Table TS 4.1-2 Sampling Test 2, footnote (3) states that the boron concentration test is required in all plant modes. ITS 3.1.1 is applicable in MODE 2 with k_{eff} < 1.0 and in MODES 3, 4, and 5. This changes CTS by not requiring the boron concentration test in MODE 1 and MODE 2 with k_{eff} ≥ 1.0. ITS 3.9.1 provides the MODE 6 boron concentration limits.	3.1.1	Table TS 4.1-2	5
3.1.4 L01	CTS 3.10.i requires that if the rod position deviation monitor is inoperable, individual rod positions shall be logged at least once per eight hours and after a load change > 10% of rated power or after > 24 steps of control rod motion. ITS SR 3.1.4.1 requires verification that the individual rod positions are within the alignment limits every 12 hours. This changes the CTS by eliminating the requirement to log the individual rod positions once per 8 hours and after a load change > 10% of rated power or after > 24 steps of control rod motion when the Rod Position Deviation Monitor is inoperable.	SR 3.1.4.1	3.10.i	7

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.4 L02	Note (b) to CTS Table TS 4.1-1 Channel Description 9 requires an Analog Rod Position check following rod motion in excess of 24 steps when the computer is out of service. Note (b) to CTS TS Table 4.1-1 Channel Description 10 requires a Rod Position Bank Counters check following rod motion in excess of 24 steps when the computer is out of service. ITS SR 3.1.4.1 requires a verification that individual rod positions are within alignment every 12 hours. This changes the CTS by not requiring an Analog Rod Position check and a Rod Position Bank Counters check following rod motion in excess of 24 steps when the computer is out of service.	SR 3.1.4.1	Table TS 4.1-1	7
3.1.4 L03	Note 1 to CTS Table TS 4.1-3 requires, in part, that the Control Rods be tested to verify OPERABILITY following maintenance on equipment that could affect the operation. ITS 3.1.4 does not include this requirement. This changes the CTS by eliminating a post-maintenance Surveillance Requirement.	None	Table TS 4.1-3	5
3.1.5 L01	CTS 3.10.d.1 does not provide any explicit time to restore the shutdown rods to within their limits. As a result, LCO 3.0.c would be entered, which requires action to be initiated within 1 hour, to be in HOT STANDBY (equivalent to ITS MODE 2) within the next 6 hours, and in HOT SHUTDOWN (equivalent to ITS MODE 3) within the following 6 hours. Under similar conditions, ITS 3.1.5 ACTION A provides one hour to either verify that the SDM is within the limits specified in the COLR or to initiate boration to restore the SDM to within limits and 2 hours to restore the shutdown banks to within limits. Additionally, ITS 3.1.5 ACTION B provides 6 hours to be in MODE 3 if any Required Action and associated Completion Time of ACTION A are not met. This changes the CTS by providing specific ACTIONS when the shutdown banks are not within the limits specified in the COLR.	3.1.5 ACTION A, 3.1.5 ACTION B	3.10.d.1	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.6 L01	CTS 3.10.d.2 requires the control banks to be limited in physical insertion as specified in the COLR, but does not specifically state an applicability. CTS 3.10.d.2.A, B, and C provide actions to be taken if the control banks insertion limits are not met. If the control bank insertion limits are not restored, then the unit must be placed in HOT STANDBY (equivalent to ITS MODE 2) within 7 hours and in HOT SHUTDOWN (equivalent to ITS MODE 3) within 13 hours. Thus, the effective Applicability for the control bank insertion limits is OPERATING and HOT STANDBY MODES (equivalent to ITS MODES 1 and 2). ITS 3.1.6 requires the control bank insertion limits to be met in MODE 1 and in MODE 2 with $k_{eff} \geq 1.0$. This changes the CTS by only requiring the control bank limits to met in MODE 2 with $k_{eff} \geq 1.0$, in lieu of at all times in MODE 2. Consistent with this change in Applicability, the requirements in CTS 3.10.d.2.C to be in HOT STANDBY and HOT SHUTDOWN are changed to be in MODE 2 with $k_{eff} < 1.0$ within 6 hours.	3.1.6 Applicability	3.10.d.2, 3.10.d.2.A, 3.10.d.2.B, 3.10.d.2.C	2
3.1.6 L02	CTS 3.10.d.2.A requires that if the control banks physical insertion limits (i.e., insertion, sequence, or overlap) are not met, then within 1 hour initiate boration to restore control bank insertion to within limits. ITS 3.1.6 ACTION A and ACTION B contain the same requirements but allows a choice between verifying that the SDM is within the limits specified in the COLR (ITS 3.1.6 Required Actions A.1.1 and B.1.1) within 1 hour or initiating boration to restore SDM to within limits within 1 hour (ITS 3.1.6 Required Actions A.1.2 and B.1.2). This changes the CTS by allowing either the verification that SDM is within the limits specified in the COLR or the initiation of boration to restore the required SDM within one hour when the control banks are not within the physical insertion limits.	3.1.6 ACTION A, 3.1.6 ACTION B	3.10.d.2.A	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.8 L01	CTS 3.10.f.1 (ITS 3.4.2, " RCS Minimum Temperature for Criticality") states that the reactor shall not be brought to a critical condition until the pressure-temperature state is to the right of the criticality limit line shown in Figure TS 3.1-1. ITS 3.1.8 provides an exception to LCO 3.4.2, "RCS Minimum Temperature for Criticality," provided the RCS lowest loop average temperature is ≥ 530ºF. A Surveillance Requirement (SR 3.1.8.1) to verify the RCS lowest loop average temperature is ≥ 530ºF every 30 minutes has been added. In addition, ACTION C has been added to cover the situation when RCS lowest loop average temperature is not within limit. The Required Action is to restore RCS lowest loop average temperature to within limit within 15 minutes. If this is not met, then ACTION D requires the unit to be in MODE 3 within 15 minutes. This changes the CTS by allowing the suspension of LCO 3.4.2, "RCS Minimum Temperature for Criticality." However, it places a limitation on the RCS lowest loop average temperature.	LCO 3.1.8, SR 3.1.8.1	3.10.f.1	1
3.2.1 L01	CTS 3.10.b.6.C requires an additional Surveillance Frequency to verify the $F_Q^N(Z)$ transient limit is within the limit specified in the COLR if the $F_Q^N(Z)$ transient relationship's margin to the limit decreases since the previous evaluation. ITS SR 3.2.1.2 maintains this additional Frequency as specified in the Note to the SR, but ties it to the $F_Q^N(Z)$ equilibrium (i.e., $F_Q^C(Z)$) relationship's margin to the limit. This changes the CTS by requiring the additional Surveillance Frequency if the $F_Q^N(Z)$ equilibrium relationship's margin to the limit decreases since the previous evaluation in lieu of the $F_Q^N(Z)$ transient relationship's margin to the limit.	SR 3.2.1.2	3.10.b.6.C	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	CTS 3.10.c.2 states that with QPTR > 1.02, eliminate the tilt condition within 24 hours or reduce power to ≤ 50% RTP. CTS 3.10.c.3.B states that when QPTR is > 1.09 due to misalignment of a rod, eliminate the tilt condition within 12 hours or reduce power to a minimum load condition (≤ 30 Mwe). CTS 3.10.c.4 states that when QPTR is > 1.09 for reasons other than misalignment of a rod, the reactor shall immediately be brought to a no load condition (≤ 5% RTP). When the QPTR is > 1.02, ITS 3.2.4, Required Action A.2 requires the QPTR to be determined once per 12 hours, Required Action A.3 requires FQ(Z) and $F^N_{\Delta H}$ to be verified to be within limits (i.e., by performing SR 3.2.1.1, SR 3.2.1.2, and SR 3.2.2.1) within 24 hours after achieving equilibrium conditions after the power reduction and every 7 days thereafter, Required Action A.4 requires the safety analyses to be reevaluated to confirm the results are still valid for the duration of operation under this condition prior to increasing power, Required Action A.5 requires (after completion of Required Action A.4) the excore detectors to be normalized to restore QPTR within limit prior to increasing power, and Required Action A.6 requires FQ(Z) and $F^N_{\Delta H}$ to be verified to be within limits (i.e., by performing SR 3.2.1.1, SR 3.2.1.2, and SR 3.2.2.1) within 24 hours after achieving equilibrium condition at RTP not to exceed 48 hours after increasing power. In addition, for the condition of QPTR > 1.09 for reasons other than misalignment of a rod, ITS 3.2.4 Required Action A.1 requires THERMAL POWER to be reduced $\geq$ 3% from RTP for each 1% of QPTR > 1.00, similar to the CTS 3.10.c.1.B and CTS 3.10.c.3.A requirements (changed from 2% to 3% as described in DOC M01). Furthermore, ITS 3.2.4 ACTION B states that with a Required Action and associated Completion Time (of Condition A) not met, reduce THERMAL POWER to $\leq$ 50% RTP within 4 hours. This changes the CTS by eliminating requirements to be $\leq$ 50% RTP, minimum load condition, or no load condition within a specified time of exceeding the LCO and substituting compensatory measures in ITS 3.2.4 ACTION A, which if not met, result in a reduction in power per ITS 3.2.4 ACTION B.	3.2.4 ACTION A, 3.2.4 ACTION B	3.10.c.2, 3.10.c.4	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2.4 L02	CTS 3.10.j states that if one or both of the quadrant power tilt monitors are inoperable, individual upper and lower excore detector calibrated outputs and the quadrant tilt shall be logged once per shift and after a load change > 10% of rated power or after > 24 steps of control rod motion. It also states the monitors shall be set to alarm at 2% tilt ratio. ITS SR 3.2.4.1 requires verification that QPTR is within limit every 7 days and the ITS does not include the monitor alarm setpoint. This changes the CTS by eliminating the requirement to verify QPTR more frequently when one or both QPTR alarms are inoperable.	SR 3.2.4.1	3.10.j	7
3.3.1 L01	CTS 3.5.c states, in part, that when the number of channels of a subsystem fall below the limits given in Table TS 3.5-2 Column 3 operation shall be limited according to the requirement shown in Column 6 as soon as practicable. Table TS 3.5-2 Functional Unit 3 (Nuclear Flux Intermediate Range), Column 3 requires one Nuclear Flux Intermediate Range channel to be OPERABLE. If both of the Nuclear Flux Intermediate Range channels are inoperable, then Table TS 3.5-2 Functional Unit 3 Column 6 requires maintaining HOT SHUTDOWN. Since there is no required action to take when there are two Nuclear Flux Intermediate Range channels, CTS 3.0.c must be entered. CTS 3.0.c requires action to be initiated within 1 hour and to be in HOT STANDBY (equivalent to ITS MODE 2) in the following 6 hours and to be in HOT SHUTDOWN (equivalent to ITS MODE 3) in the following 6 hours. ITS LCO 3.3.1 requires the RPS instrumentation in Table 3.3.1-1 to be OPERABLE. ITS Table 3.3.1-1 Function 4 requires two Nuclear Flux Intermediate Range channels to be OPERABLE. ITS 3.3.1 ACTION G provides compensatory actions to take with two Intermediate Range Neutron Flux channels inoperable and requires suspension of operations involving positive reactivity additions immediately, but allows limited plant cooldown or boron dilution provided that the change is accounted for in the calculated SDM and reduction of THERMAL POWER to < P-6 within 2 hours. This changes the CTS by allowing suspension of operation involving positive reactivity additions and reduction of THERMAL POWER instead of placing the unit in HOT SHUTDOWN.	3.3.1 ACTION G	3.5.c, Table TS 3.5-2 Functional Unit 3	4

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 3.5.c states, in part, that when the number of channels of a subsystem fall below the limits given in Table TS 3.5-2 Column 3 operation shall be limited according to the requirement shown in Column 6 as soon as practicable. Table TS 3.5-2 Functional Unit 17 (Reactor Trip Breaker (RTB)), Column 3 requires two RTB channels to be OPERABLE. If one RTB channel is inoperable, then Table 3.5-2 Column 6 requires maintaining HOT SHUTDOWN and opening of the RTBs. Table 3.5-2 Column 5 also contains a Note that says that the RTBs may be bypassed for up to 8 hours for surveillance testing or maintenance. ITS LCO 3.3.1 requires the RPS instrumentation in Table 3.3.1-1 to be OPERABLE. ITS Table 3.3.1-1 Function 17 requires two Reactor Trip Breaker (RTB) trains to be OPERABLE. ITS 3.3.1 ACTION O provides compensatory actions to take with one RTB train inoperable and requires restoring the RTB train to OPERABLE status within 24 hours or to be in MODE 3 within 30 hours. The Required Actions are modified by a Note that allows one RTB train to be bypassed for up to 4 hours for surveillance testing, provided that the other train is OPERABLE. This changes the CTS by allowing restoration of the RTB train in lieu of opening the RTBs. Additionally it changes the CTS by allowing 30 hours to be in MODE 3 instead of the 13 hours required in the CTS and not allowing one train of RTB to be bypassed for up to 8 hours for maintenance. See DOC M13 for changes related to surveillance testing.	3.3.1 ACTION O	Table TS 3.5-2 Functional Unit 17	4
3.3.1 L03	CTS 3.5.c states, in part, that when the number of channels of a subsystem fall below the limits given in Table TS 3.5-2 Column 3 operation shall be limited according to the requirement shown in Column 6 as soon as practicable. Table TS 3.5-2 Functional Unit 17 (RTB (Independently Test Shunt and Undervoltage Attachments)), Column 3 requires two RTB (Independently Test Shunt and Undervoltage Attachments) channels per breaker to be OPERABLE. If one RTB (Independently Test Shunt and Undervoltage Attachments) channel per breaker is inoperable, then Table 3.5-2 Column 6 allows 72 hours before maintaining HOT SHUTDOWN and opening of the RTBs. ITS Table 3.3.1-1 Function 18 requires two Reactor Trip Breaker Undervoltage and Shunt Trip Mechanisms per RTB to be OPERABLE. ITS 3.3.1 ACTION R	3.3.1 ACTION R	3.5.c Table 3.5-2 Functional Unit 17	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.1 L03 (continued)	provides compensatory actions to take with one RTB Reactor Trip Breaker Undervoltage and Shunt Trip Mechanisms per RTB inoperable and requires restoration of the inoperable trip mechanism to OPERABLE status within 48 hours or to be in MODE 3 within 54 hours. This changes the CTS by not requiring the RTBs to be opened when in MODE 3 (CTS equivalent HOT SHUTDOWN) after 72 hours.	3.3.1 ACTION R	3.5.c Table 3.5-2 Functional Unit 17	4
3.3.1 L04	CTS Table 3.5-2 requires the Permissive/Interlocks to be OPERABLE. However, no specific ACTIONS are provided for when an interlock is inoperable. Therefore, all affected RPS instrumentation would be declared inoperable and CTS 3.0.c would be entered. CTS 3.0.c requires action to be initiated within 1 hour, to be in HOT STANDBY (equivalent to ITS MODE 2) in the next 6 hours, and to be in HOT SHUTDOWN (equivalent to ITS MODE 3) in the following 6 hours. ITS Table 3.3.1-1 Function 16.a requires two Intermediate Range Neutron Flux, P-6 channels to be OPERABLE. ITS Table 3.3.1-1 Function 16.d requires four Power Range Neutron Flux, P-10 channels to be OPERABLE. ITS 3.3.1 ACTION P provides compensatory actions to take with one or more Intermediate Range Neutron Flux, P-6 channels or Power Range Neutron Flux, P-10 channels are inoperable and requires verification that the interlock is in the required state for existing unit conditions within 1 hour or to be in MODE 3 within 7 hours. ITS Table 3.3.1-1 Function 16.b requires four Low Power Reactor Trips Blocks, P-7 channels to be OPERABLE. ITS Table 3.3.1-1 Function 16.c requires four Power Range Neutron Flux, P-8 channels to be OPERABLE. ITS Table 3.3.1-1 Function 16.e requires two Turbine Impulse Pressure, P-13 channels to be OPERABLE. ITS 3.3.1 ACTION Q provides compensatory actions to take with one or more Power Range Neutron Flux, P-7 channel per train, Power Range Neutron Flux, P-8 channels, or Turbine Impulse Pressure, P-13 channels are inoperable and requires verification that the interlock is in the required state for existing unit conditions within 1 hours or to be in MODE 2 within 7 hours. This changes the CTS by allowing continued operation as long as the interlock is placed in the correct state for existing unit operation and providing actions if the inoperable interlock is not placed in the correct state.	3.3.1 ACTION Q	Table TS 3.5-2	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.1 L05	CTS Table TS 4.1-1 Channel Description 1 requires a CHANNEL FUNCTIONAL TEST of the Nuclear Power Range channels (High Setting, Positive Setting, and Negative Setting) to be performed monthly as stated in Remarks (b). CTS Table TS 4.1-1 Channel Description 4 requires a CHANNEL FUNCTIONAL TEST of the Overtemperature ΔT and the Overpower ΔT channels to be performed monthly. CTS Table TS 4.1-1 Channel Description 5 requires a CHANNEL FUNCTIONAL TEST of the Reactor Coolant Flow channels to be performed monthly. CTS Table TS 4.1-1 Channel Description 6 requires a CHANNEL FUNCTIONAL TEST of the Pressurizer Water Level channels to be performed monthly. CTS Table TS 4.1-1 Channel Description 7 requires a CHANNEL FUNCTIONAL TEST of the Pressurizer Pressure channels to be performed monthly. CTS Table TS 4.1-1 Channel Description 11.a requires a CHANNEL FUNCTIONAL TEST of the Steam Generator Low Level channels to be performed monthly. CTS Table TS 4.1-1 Channel Description 12 requires a CHANNEL FUNCTIONAL TEST of the Steam Generator Flow Mismatch channels to be performed monthly. ITS Table 3.3.1-1 Functions 2.a (Power Range Neutron Flux – High), 3.a (Power Range Neutron Flux Rate – High Positive Rate), 3.b (Power Range Neutron Flux Rate – High Negative Rate), 6 (Overtemperature ΔT), 7 (Overpower ΔT), 8.a (Pressurizer Pressure – Low), 8.b (Pressurizer Pressure – High), 9 (Pressurizer Water Level – High), 10 (Reactor Coolant Flow – Low), 14 (Steam Generator (SG) Water Level – Low Low), and 15 (SG Water Level – Low and SG Water Level – Low – Coincident with Steam Flow/Feedwater Flow Mismatch) requires performance of a COT (ITS SR 3.3.1.7) every 184 days. Additionally, this Surveillance Requirement is modified by a Note, which states that the SR is not required to be performed for source range instrumentation prior to entering MODE 3 from MODE 2 until 4 hours after entry into MODE 3. This changes the CTS by changing the frequency of the Surveillances from monthly and quarterly to 184 days and allowing performance of the source range instrumentation COT to be delayed until 4 hours after entering MODE 3. See DOC A06 for discussion on changing the CHANNEL FUNCTIONAL TEST to COT.	SR 3.3.1.7	Table TS 4.1-1 Chanel Description 1 Channel Description 4, Channel Description 5, Channel Description 6, Channel Description 7, Channel Description 11.a, Channel Description 12,	9

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.1 L06	CTS Table TS 4.1-1 Channel Description 1 requires a CHANNEL FUNCTIONAL TEST of the Nuclear Power Range channels (25% reactor trip, i.e., the Low Setting) to be performed quarterly as stated in Remarks (d). CTS Table TS 4.1-1 Channel Description 2 requires a CHANNEL FUNCTIONAL TEST of the Nuclear Intermediate Range channels prior to each startup if not done the previous week. CTS Table TS 4.1-1 Channel Description 3 requires a CHANNEL FUNCTIONAL TEST of the Nuclear Source Range channels prior to each startup if not done the previous week. ITS Table 3.3.1-1 Functions 2.b (Power Range Neutron Flux – Low), 4 (Intermediate Range Neutron Flux), and 5 (Source Range Neutron Flux) require performance of ITS SR 3.3.1.8. ITS SR 3.3.1.8 requires performance of COT in accordance with the Setpoint Control Program prior to reactor startup and four hours after reducing power below P-6 for source range instrumentation and twelve hours after reducing power below P-10 for power and intermediate range instrumentation and every 184 days thereafter. Additionally, the Frequency contains a Note, which states that the surveillance is only required to be performed when not performed within the previous 184 days. Additionally, the Surveillance Requirement itself is modified by a Note that says that this Surveillance shall include verification that the P-6 and P-10 interlocks are in their required state for existing unit conditions. This changes the CTS by requiring the performance of a COT for the Nuclear Power Range channels every 184 days instead of the monthly and quarterly requirements of CTS.	SR 3.3.1.8	Table TS 4.1-1 Channel Description 1, Channel Description 2, Channel Description 3	9
3.3.1 L07	CTS Table TS 4.1-1 Channel Description 1 requires a CHANNEL CHECK every Effective Full Power Month, but Remark (c) states that the check for axial offset shall be performed prior to > 75% power following any core alterations. CTS Table TS 4.1-1 Channel Description 1 requires a CHANNEL CALIBRATION every Effective Full Power Quarter, but Remark (c) states that the check for axial offset shall be performed prior to > 75% power following any core alterations. ITS SR 3.3.1.3 requires comparing the results of the incore detector measurements to Nuclear Instrumentation (NIS) AFD with an adjustment of the NIS channel if the absolute difference is ≥ 3%. This Surveillance Requirement is modified	SR 3.3.1.3, SR 3.3.1.6	Table TS 4.1-1 Channel Description 1	6

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.1 L07 (continued)	by a Note which allows the SR to not be performed until 24 hours after THERMAL POWER is ≥ 15% RTP. ITS SR 3.3.1.6 requires calibration of excore channels to agree with the incore detector measurements. This Surveillance also contains a Note, which allows the SR to not be performed until 24 hours after THERMAL POWER is ≥ 50% RTP. This changes the CTS by specifically requiring a comparison of the results of the incore detector measurements to the NIS AFD and allowing the SR to be performed 24 hours after THERMAL POWER is ≥ 15% RTP instead of performing the CTS required CHANNEL CHECK. Additionally, this changes the CTS by specifically requiring a calibration of the excore channels to agree with the incore detector measurements instead of a CHANNEL CALIBRATION.	SR 3.3.1.3, SR 3.3.1.6	Table TS 4.1-1 Channel Description 1	6
3.3.1 L08	CTS Table TS 4.1-1 Channel Description 24 requires a TEST of the Turbine First Stage Pressure every month. ITS Table 3.3.1-1 Function 16.e (Reactor Trip System Interlocks – Turbine Impulse Pressure – P-13) requires performance of a COT (ITS SR 3.3.1.13) every 18 months. This changes the CTS by requiring the performance of the COT for the Turbine First Stage Pressure every 18 months instead of the monthly requirement of CTS.	SR 3.3.1.13,	Table TS 4.1-1 Channel Description 24	7
3.3.1 L09	CTS Table TS 4.1-1 Channel Description 26 requires a TEST of the Protective System Logic Channel Testing every month. ITS Table 3.3.1-1 Function 19 (Automatic Trip Logic) requires performance of an ACTUATION LOGIC TEST every 92 days on a STAGGERED TEST BASIS (ITS SR 3.3.1.5). This changes the CTS by requiring the performance of an ACTUATION LOGIC TEST every 92 days on a STAGGERED TEST BASIS instead of the monthly requirement of CTS.	SR 3.3.1.5	Table TS 4.1-1 Channel Description 26	9
3.3.1 L10	CTS Table TS 4.1-1 Channel Description 8a requires a TEST of the 4-KV Voltage and 4-KV Frequency to be performed monthly. ITS Table 3.3.1-1 Functions 12 (Undervoltage RCPs) and 13 (Underfrequency RCPs) requires performance of a TADOT (ITS SR 3.3.1.9) every 92 days. This changes the CTS by changing the Frequency of the Surveillances from monthly to 92 days.	SR 3.3.1.9	Table TS 4.1-1 Channel Description 8a	9

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.1 L11	Note 1 to CTS Table TS 4.1-3 requires, in part, that the Reactor Trip Breakers, Reactor Coolant Pump Breakers – Open – Reactor Trip, and Manual Reactor Trip be tested to verify OPERABILITY following maintenance on equipment that could affect the operation. ITS 3.3.1 does not include this requirement. This changes the CTS by eliminating a post maintenance Surveillance Requirement.	None	Table TS 4.1-3	5
3.3.1 L12	CTS 3.5.d states, in part, that in the event of subsystem instrumentation channel failure permitted by CTS 3.5.b, then Table TS 3.5-2 does not need to be observed for approximately 4 hours while the operable channels are tested, as long as the failed channel is blocked to prevent an unnecessary reactor trip. ITS 3.3.1 ACTION D, which provides the actions when one Power Range Neutron Flux – High channel is inoperable, includes a Note that states the inoperable channel may be bypassed for up to 12 hours for surveillance testing and setpoint adjustment of other channels. ITS 3.3.1 ACTION E, which provides the actions when one channel of the Power Range Neutron Flux – Low, Power Range Neutron Flux Rate – High Positive Rate, Power Range Neutron Flux Rate – High Negative Rate, Overtemperature ΔT, Overpower ΔT, Pressurizer Pressure – High, Steam Generator (SG) Water Level – Low Low, SG Water Level – Low, or SG Water Level – Low Coincident with Steam Flow/Feedwater Flow Mismatch Function is inoperable, includes a Note that states the inoperable channel may be bypassed for up to 12 hours for surveillance testing of other channels. ITS 3.3.1 ACTION K, which provides the actions when one channel of the Pressurizer Pressure – Low, Pressurizer Water Level – High, Reactor Coolant Flow – Low, Undervoltage RCPs, or Underfrequency RCPs Function is inoperable, includes a Note that states the inoperable channel may be bypassed for up to 12 hours for surveillance testing of other channels. This changes the CTS by allowing an inoperable channel to be bypassed 12 hours to perform surveillance testing of other channels instead of the 4 hours allowed in the CTS.	3.3.1 ACTION D, 3.3.1 ACTION E, 3.3.1 ACTION K	3.5.d Table TS 3.5-2	9

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.1 L13	CTS Table TS 3.5-2 Note (4) requires the Reactor Coolant Pump Breakers to be OPERABLE, since they provide the direct reactor trip signal when the Underfrequency 4-kV Bus channels trip. However, CTS 3.5.2 does not provide any explicit Actions to take when the Reactor Coolant Pump Breakers are inoperable in either single loop or two loop operation. Since these channels support the Underfrequency 4-kV Bus channels, KPS would take the Column 6 actions for inoperable Underfrequency 4-kV Bus channels. This action requires the plant to be maintained in HOT SHUTDOWN. Since there is no time limit to attain HOT SHUTDOWN, KPS uses the times from CTS 3.0.c. CTS 3.0.c requires action to be initiated within 1 hour and to be in HOT STANDBY (equivalent to ITS MODE 2) in the next 6 hours and to be in HOT SHUTDOWN (equivalent to ITS MODE 3) in the following 6 hours. ITS Table 3.3.1-1 Function 11.a requires one Reactor Coolant Pump (RCP) Breaker Position channel per RCP to be OPERABLE in single loop operation. ITS 3.3.1 ACTION L provides compensatory actions to take when one Reactor Coolant Pump Breaker Position channel is inoperable in single loop operation, and requires the restoration of the channel to OPERABLE status within 6 hours or the reduction of THERMAL POWER to below P-8 within 10 hours. Additionally, ACTION L contains a Note which allows the inoperable channel to be bypassed for up to 4 hours for surveillance testing of other channels. ITS Table 3.3.1-1 Function 11.b requires one RCP Breaker Position channel per RCP to be OPERABLE in two loop operation. ITS 3.3.1 ACTION M provides compensatory actions to take when one Reactor Coolant Pump Breaker Position channel is inoperable in two loop operation and requires placing the inoperable channel in trip within 6 hours or the reduction of THERMAL POWER to below P-7 within 12 hours. Additionally, ACTION M contains a Note which allows the inoperable channel to be bypassed for up to 4 hours for surveillance testing of other channels. This changes the CTS by adding specific ACTIONS to take with an inoperable channel of the Reactor Coolant Pump Breaker Position when in single or two loop operation. See DOC A11 for discussion of the Applicability and required channels.	3.3.1 ACTION L, 3.3.1 ACTION M	Table TS 3.5-2	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.1 L14	CTS 3.5 does not provide any explicit Actions to take when the Protective System Logic Channels are inoperable. However, since the RPS Protective System Logic Channels support OPERABILITY of the RPS trip channels, when one or more of the RPS Protective System Logic Channels are inoperable, KPS declares the associated RPS trip channels inoperable and takes the appropriate actions required by CTS Table TS 3.5-2, i.e., maintain HOT SHUTDOWN. Since there is no time limit to attain HOT SHUTDOWN, KPS uses the times from CTS 3.0.c. CTS 3.0.c requires action to be initiated within 1 hour, to be in HOT STANDBY (equivalent to ITS MODE 2) in the next 6 hours, and to be in HOT SHUTDOWN (equivalent to ITS MODE 3) in the following 6 hours. ITS Table 3.3.1-1 Function 19 requires two trains of the Automatic Trip Logic to be OPERABLE in MODES 1 or 2 (as discussed in DOC A12). ITS 3.3.1 ACTION N provides the compensatory actions to take when one train of the Automatic Trip Logic is inoperable, and requires restoration of the train to OPERABLE status within 24 hours or to be in MODE 3 within 30 hours. Additionally, ACTION N contains a Note which allows the inoperable channel to be bypassed for up to 4 hours for surveillance testing of other channels. This changes the CTS by adding a specific ACTION to take when one train of the Protective System Logic is inoperable in MODES 1 and 2. See DOC A12 for discussion of the Applicability and required channels and see DOC M12 for MODES 3, 4, and 5 with the Rod Control System capable of rod withdrawal or one or more rods not fully inserted Applicability.	3.3.1 ACTION N	3.5	9
3.3.1 L15	CTS Table TS 4.1-1 Channel Description 1, Remark d) states, in part, that Permissives P8 and P10 are tested quarterly. ITS Table 3.3.1-1 Functions 16.c (Power Range Neutron Flux, P-8) and 16.d (Power Range Neutron Flux, P-10) requires performance of COT (SR 3.3.1.13) every 18 months. This changes the CTS by extending the Surveillance Frequency from quarterly to 18 months. See DOC A06 for discussion of the CTS TEST to the ITS COT.	SR 3.3.1.13	Table TS 4.1-1 Channel Description 1	7

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.2 L01	CTS Table TS 4.1-1 Channel Descriptions 7 (Pressurizer Pressure), 11.a (Steam Generator Low Level), 11.b (Steam Generator High Level), 18.a (Containment Pressure (SIS signal)), 18.b (Containment Pressure (Steamline Isolation)), 18.c (Containment Pressure (Containment Spray Act)), and 23 (Steam Generator Pressure) require a CHANNEL FUNCTIONAL TEST monthly. ITS Table 3.3.2-1 Functions 1.d (Safety Injection – Pressurizer Pressure-Low), 6.b (Auxiliary Feedwater – Steam Generator Water Level-Low Low), 5.b (Feedwater Isolation – Steam Generator Water Level-High High), 1.c (Safety Injection – Containment Pressure-High), 4.c (Steam Line Isolation – Containment Pressure-High), 2.c (Containment Spray – Containment Pressure-High High), and 1.e (Safety Injection – Steam Line Pressure-Low) require performance of a CHANNEL OPERATIONAL TEST (COT) (ITS SR 3.3.2.4) every 184 days. This changes the CTS by changing the Frequency from monthly to 184 days for CTS Table TS 4.4-1 Channel Descriptions 7, 11.a, 11.b, 18.a, 18.b, 18.c, and 23. See Discussion of Change A06 for discussion on changing TEST to COT.	SR 3.3.2.4	Table TS 4.1-1 Channel Description 7, Channel Description 11.a, Channel Description 11.b, Channel Description 18.a, Channel Description 18.b, Channel Description 18.c, Channel Description 23	9
3.3.2 L02	Column 6 of CTS Table TS 3.5-3 specifies the "OPERATOR ACTION IF CONDITIONS OF COLUMN 3 OR 4 CANNOT BE MET." Column 6 requires placing the unit in HOT SHUTDOWN (equivalent to ITS MODE 3) for Functional Units 1.b and 3.b of Table TS 3.5-3. The HOT SHUTDOWN requirement in Column 6 contains a footnote, footnote (1) for Functional Unit 1.b of Table TS 3.5-3, which states if minimum conditions are not met within 24 hours (i.e., restoration of at least the minimum number of OPERABLE channels required in Column 3), steps shall be taken to place the plant in a COLD SHUTDOWN (equivalent to ITS MODE 5) condition. In addition, the HOT SHUTDOWN requirement in Column 6 of Table TS 3.5-3 contains a footnote, footnote (3) for Functional Unit 3.b, which states if minimum conditions are not met within 24 hours (i.e., restoration of at least the minimum number of OPERABLE channels required in Column 3), steps shall be taken to place the plant in a COLD SHUTDOWN (equivalent to ITS MODE 5) condition. Based on the footnote 1 and footnote 3 requirements to place the unit in COLD	3.3.2 Applicability	Table TS 3.5-3 Functional Unit 1.b, Functional Unit 3.b	2

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.2 L02 (continued)	SHUTDOWN, the Mode of Applicability would be OPERATING (equivalent to ITS MODE 1), HOT STANDBY (equivalent to ITS MODE 2), HOT SHUTDOWN (equivalent to ITS MODE 3), and INTERMEDIATE SHUTDOWN (equivalent to ITS MODE 4). ITS LCO 3.3.2 requires the ESFAS instrumentation to be OPERABLE. ITS Table 3.3.2-1 Mode of Applicability for Functions 1.c and 2.c is MODES 1, 2, and 3. Commensurate with the change in the Mode of Applicability for these same Functions, there is also a change in the Mode of Applicability to remove the unit from the LCO. CTS requires the unit be placed in HOT SHUTDOWN (equivalent to ITS MODE 3) in the event that the minimum number of OPERABLE channels is less than that required and if minimum conditions are not met within 24 hours, steps shall be taken to place the unit in COLD SHUTDOWN (equivalent to ITS MODE 5). ITS LCO 3.3.2 requires the unit be placed in MODE 4 to exit the LCO since Functions 1.c and 2.c are required in MODES 1, 2, and 3. This changes the CTS Mode of Applicability from MODES 1, 2, 3, and 4 to MODES 1, 2, and 3 and changes the Mode required to exit the LCO from MODE 5 to MODE 4. Discussion of Change M10 addresses the change in the time to exit the Mode of Applicability.	3.3.2 Applicability	Table TS 3.5-3 Functional Unit 1.b, Functional Unit 3.b	2
3.3.2 L03	CTS 3.5 does not provide any explicit Actions to take when the Protective System Logic Channels are inoperable. However, since the ESFAS Protective System Logic Channels support OPERABILITY of the ESFAS trip channels, when one or more of the ESFAS Protective System Logic Channels are inoperable, KPS declares the associated ESFAS trip channels inoperable and takes the appropriate actions required by CTS Table TS 3.5-3 or TS 3.5-4, i.e., maintain HOT SHUTDOWN followed by placing the unit in COLD SHUTDOWN if the channel is not restored within 24 hours. Since there are no time limits to attain HOT SHUTDOWN or COLD SHUTDOWN, KPS uses the times from CTS 3.0.c. CTS3.0.c requires action to be initiated within 1 hour, to be in HOT STANDBY (equivalent to ITS MODE 2) in the next 6 hours, and to be in HOT SHUTDOWN (equivalent to ITS MODE 3) in the following 6 hours, and to be in COLD SHUTDOWN in the subsequent 36 hours (equivalent to ITS MODE 5). ITS Table 3.3.2-1 Functions 1.b, 2.b, and 3.b (Automatic Actuation Logic and Actuation Relays for Safety Injection, Containment	3.3.2 ACTION C, 3.3.2 ACTION G	3.5	9

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.2 L03 (Continued)	Spray, and Containment Isolation, respectively) require two trains of the Automatic Actuation Logic and Actuation Relays to be OPERABLE in MODES 1, 2, 3, 4 (as discussed in DOC A13). ITS 3.3.2 ACTION C provides the compensatory actions to take when one train of the Automatic Actuation Logic and Actuation Relays for Functions 1.b, 2.b, or 3.b is inoperable, and requires the restoration of the train to OPERABLE status within 24 hours or to be in MODE 3 within 30 hours and be in MODE 5 within 60 hours. Additionally, ACTION C contains a Note which allows the inoperable train to be bypassed for up to 4 hours for surveillance testing provided the other train is OPERABLE. ITS Table 3.3.2-1 Functions 4.b, 5.a, and 6.a (Automatic Actuation Logic and Actuation Relays for Steam Line Isolation, Feedwater Isolation, and Auxiliary Feedwater, respectively) require two trains of the Automatic Actuation Logic and Actuation Relays to be OPERABLE. The trains are required in MODE 1 and MODES 2 and 3 except when all MSIVs are closed and deactivated for Function 4.b, in MODE 1 and MODES 2 and 3 except when all MFIVs, MFRVs, and associated bypass valves are closed and de-activated or isolated by a closed manual valve for Function 5.a, and in MODES 1, 2, and 3 for Function 6.a (as discussed in DOC A13). ITS 3.3.2 ACTION G provides the compensatory actions to take when one train of the Automatic Actuation Logic and Actuation Relays for Functions 4.b, 5.a, or 6.a is inoperable, and requires the restoration of the train to OPERABLE status within 24 hours or to be in MODE 3 within 30 hours and be in MODE 4 within 36 hours. Additionally, ACTION G contains a Note which allows the one train to be bypassed for up to 4 hours for surveillance testing provided the other train is OPERABLE. This changes the CTS by adding specific ACTIONS to take when one train of the Protective System Logic is inoperable. See DOC A13 for Discussion of the Applicability and required trains.	3.3.2 ACTION C, 3.3.2 ACTION G	3.5	9

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.2 L04	CTS Table TS 3.5-3 Functional Unit 4.d, Motor-Driven Auxiliary Feedwater (AFW) Pumps 4KV Buses 1-5 and 1-6 undervoltage, requires 1 channel per bus to be OPERABLE. If one of the required channels is inoperable, the unit is required to maintain HOT SHUTDOWN or operate diesel generators. CTS Table TS 3.5-3 Functional Unit 4.d also contains references to footnote (5), which states "Each channel consists of one instantaneous and one time-delay relay connected in series," and footnote (6) which states "When one component of a channel is taken out of service, that component shall be in the tripped condition." ITS 3.3.2 does not include this Function for the Motor-Driven AFW pumps. This changes the CTS by deleting the Motor-Driven Auxiliary Feedwater (AFW) Pumps 4KV Buses 1-5 and 1-6 undervoltage channel requirements and associated footnotes.	None	Table TS 3.5-3 Functional Unit 4.d	1
3.3.2 L05	Column 6 of CTS Table TS 3.5-3 specifies the "OPERATOR ACTION IF CONDITIONS OF COLUMN 3 OR 4 CANNOT BE MET." Column 6 requires placing the unit in HOT SHUTDOWN (equivalent to ITS MODE 3) for Functional Units 1.c and 1.d of Table TS 3.5-3. The HOT SHUTDOWN requirement in Column 6 contains a footnote, footnote (1) for Functional Units 1.c and 1.d of Table TS 3.5-3, which states if minimum conditions are not met within 24 hours (i.e., restoration of at least the minimum number of OPERABLE channels required in Column 3), steps shall be taken to place the plant in a COLD SHUTDOWN (equivalent to ITS MODE 5) condition. Based on the footnote 1 requirements to place the unit in COLD SHUTDOWN, the Mode of Applicability would be OPERATING (equivalent to ITS MODE 1), HOT STANDBY (equivalent to ITS MODE 2), HOT SHUTDOWN (equivalent to ITS MODE 3), and INTERMEDIATE SHUTDOWN (equivalent to ITS MODE 4). ITS LCO 3.3.2 requires the ESFAS instrumentation to be OPERABLE. ITS Table 3.3.2-1 Mode of Applicability for Functions 1.d and 1.e is MODES 1 and 2, and MODE 3 with pressurizer pressure ≥ 2000 psig. Commensurate with the change in the Mode of Applicability for these same Functions, there is also a change in the Mode of Applicability to remove the unit from the LCO. CTS requires the unit be placed in HOT SHUTDOWN (equivalent to ITS MODE 3) in the event that the minimum number of OPERABLE channels is less than that required and if minimum conditions are not met within 24 hours, steps shall be	3.3.2 Applicability	Table TS 3.5-3 Functional Unit 1.c, Functional Unit 1.d	2

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.2 L05 (continued)	taken to place the unit in COLD SHUTDOWN (equivalent to ITS MODE 5). ITS LCO 3.3.2 requires the unit be placed in MODE 4 to exit the LCO since Functions 1.d and 1.e are required in MODES 1 and 2, and MODE 3 with pressurizer pressure ≥ 2000 psig. This changes the CTS Mode of Applicability from MODES 1, 2, 3, and 4 to MODES 1 and 2, and MODE 3 with pressurizer pressure ≥ 2000 psig and changes the Mode required to exit the LCO from MODE 5 to MODE 4. Discussion of Change M17 addresses the change in the time to exit the Mode of Applicability. Discussion of Change M17 addresses the change in the time to exit the Mode of Applicability.	3.3.2 Applicability	Table TS 3.5-3 Functional Unit 1.c, Functional Unit 1.d	2
3.3.2 L06	Column 6 of CTS Table TS 3.5-4 specifies the "OPERATOR ACTION IF CONDITIONS OF COLUMN 3 OR 4 CANNOT BE MET." Column 6 requires placing the unit in HOT SHUTDOWN (equivalent to ITS MODE 3) for Functional Units 2.a, 2.b, and 2.c of Table TS 3.5-4. The HOT SHUTDOWN requirement in Column 6 contains a footnote, footnote (1) for Functional Units 2.a, 2.b, and 2.c of Table TS 3.5-4, which states if minimum conditions are not met within 24 hours (i.e., restoration of at least the minimum number of OPERABLE channels required in Column 3), steps shall be taken to place the plant in a COLD SHUTDOWN (equivalent to ITS MODE 5) condition. Based on the footnote 1 requirements to place the unit in COLD SHUTDOWN, the Mode of Applicability would be OPERATING (equivalent to ITS MODE 1), HOT STANDBY (equivalent to ITS MODE 2), HOT SHUTDOWN (equivalent to ITS MODE 3), and INTERMEDIATE SHUTDOWN (equivalent to ITS MODE 4). ITS LCO 3.3.2 requires the ESFAS instrumentation to be OPERABLE. ITS Table 3.3.2-1 Mode of Applicability for Functions 4.c, 4.d, and 4.e is MODE 1 and MODES 2 and 3 except when all MSIVs are closed and deactivated. Commensurate with the change in the Mode of Applicability for these same Functions, there is also a change in the Mode of Applicability to remove the unit from the LCO. CTS requires the unit be placed in HOT SHUTDOWN (equivalent to ITS MODE 3) in hours, steps shall be taken to place the unit in COLD SHUTDOWN (equivalent to ITS MODE 5). ITS LCO 3.3.2 requires the unit be placed in MODE 4 to exit the LCO since Functions 4.c, 4.d, and 4.e are required in MODE 1 and	3.3.2 Applicability	Table TS 3.5-4 Functional Unit 2.a, Functional Unit 2.b, Functional Unit 2.c	2

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.2 L06 (continued)	MODES 2 and 3 except when all MSIVs are closed and deactivated. This changes the CTS Mode of Applicability from MODES 1, 2, 3, and 4 to MODE 1 and MODES 2 and 3 except when all MSIVs are closed and deactivated and changes the Mode required to exit the LCO from MODE 5 to MODE 4. Discussion of Change M06 addresses the change in the time to exit the Mode of Applicability. Discussion of Change M06 addresses the change in the time to exit the Mode of Applicability.	3.3.2 Applicability	Table TS 3.5-4 Functional Unit 2.a, Functional Unit 2.b, Functional Unit 2.c	2
3.3.2 L07	CTS Table TS 3.5-3 Column 6 requires the unit be placed in HOT SHUTDOWN for Functional Unit 3.a (Containment Spray – Manual) if the conditions of Column 3 of CTS Table TS 3.5-3 cannot be met (i.e., less than the minimum number of OPERABLE channels). CTS Table TS 3.5-3 Column 6 requires HOT SHUTDOWN be maintained for Functional Unit 4.b (Motor-Driven Auxiliary Feedwater Pumps – Loss of Main Feedwater) if the conditions of Column 3 of CTS Table TS 3.5-3 cannot be met (i.e., less than the minimum number of OPERABLE channels). CTS Table TS 3.5-4 Column 6 requires the unit be placed in HOT SHUTDOWN for Functional Unit 2.d (Steam Line Isolation – Manual) if the conditions of Column 3 of CTS Table TS 3.5-4 cannot be met (i.e., less than the minimum number of OPERABLE channels). ITS LCO 3.3.2 requires the ESFAS instrumentation in Table 3.3.2-1 to be OPERABLE. ITS Table 3.3.2-1 Function 2.a (Containment Spray – Manual Initiation) requires ACTION B be entered if one channel is inoperable. Proposed Required Action B.1 requires the inoperable channel or train be restored to OPERABLE status within 48 prior to requiring a unit shutdown. ITS Table 3.3.2-1 Function 6.e (Auxiliary Feedwater – Trip of both Main Feedwater Pumps) requires ACTION I be entered if one channel per pump is inoperable. Proposed Required Action I.1 requires the inoperable channel be restored to OPERABLE status within 48 hours prior to requiring a unit shutdown. ITS Table 3.3.2-1 Function 4.a (Steam Line Isolation – Manual Initiation) requires ACTION F be entered if one channel is inoperable. Proposed Required Action F.1 requires the inoperable channel or train be restored to OPERABLE status within 48 prior to requiring a unit shutdown. This changes the CTS by allowing 48 hours to restore the inoperable channel or train prior to requiring a unit shutdown.	3.3.2 ACTION B, 3.3.2 ACTION F 3.3.2 ACTION I	Table TS 3.5-3 Functional Unit 3.a, Functional Unit 4.b Table TS 3.5-4 Functional Unit 2.d	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.2 L08	CTS 3.5.d states, in part, that in the event of subsystem instrumentation channel failure permitted by CTS 3.5.b, then Table TS 3.5-2 does not need to be observed for approximately 4 hours while the operable channels are tested, as long as the failed channel is blocked to prevent an unnecessary reactor trip. ITS 3.3.2 ACTION D, which provides the actions when one channel of the Safety Injection – Containment Pressure – High, Safety Injection – Pressurizer Pressure – Low, Safety Injection – Steam Line Pressure – Low, Steam Line Isolation – Containment Pressure – High High, Steam Line Isolation – High Steam Flow, Steam Line Isolation – High Steam Flow – Coincident with Tavg – Low Low, Steam Line Isolation – High High Steam Flow, Feedwater Isolation – SG Water Level High High, or Auxiliary Feedwater – SG Water Level – Low Low Function is inoperable, includes a Note that states the inoperable channel may be bypassed for up to 12 hours for surveillance testing of other channels. ITS 3.3.2 ACTION E states, in part, that with one Containment Spray – Containment Pressure – High High channel is inoperable, includes a Note that states one additional channel may be bypassed for up to 12 hours for surveillance testing of other channels. ITS 3.3.2 ACTION H, which provides the actions when one Auxiliary Feedwater – Undervoltage Reactor Coolant Pump channel is inoperable, includes a Note that states the inoperable channel may be bypassed for up to 12 hours for surveillance testing of other channels. This changes the CTS by allowing an inoperable channel to be bypassed 12 hours to perform surveillance testing of other channels instead of the 4 hours allowed in the CTS.	3.3.2 ACTION E, 3.3.2 ACTION D 3.3.2 ACTION H	3.5.d, Table TS 3.5-2	9
3.3.2 L09	CTS Table TS 4.1-1 Channel Description 26 requires a TEST of the Protective System Logic Channel every month. ITS Table 3.3.2-1 Functions 1.b, 2.b, 3.b, 4.b, 5.a, and 6.a (Automatic Actuation Logic and Actuation Relays for Safety Injection, Containment Spray, Containment Isolation, Steam Line Isolation, Feedwater Isolation, and Auxiliary Feedwater, respectively) require performance of an ACTUATION LOGIC TEST every 92 days on a STAGGERED TEST BASIS. This changes the CTS by requiring the performance of an ACTUATION LOGIC TEST every 92 days on a STAGGERED TEST BASIS instead of the monthly requirement of CTS.	SR 3.3.2.2	Table TS 4.1-1 Channel Description 26	9

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.2 L10	CTS Table TS 3.5-1 Functional Units 1 (High Containment Pressure (Hi)), 3 (Pressurizer Low Pressure), and 4 (Low Steam Line Pressure) contain a Note which states, in part, that the signal overrides any bypass on the accumulator valves. ITS 3.3.2 does not contain this requirement. This changes the CTS by deleting this requirement.	None	Table TS 3.5-1 Functional Units 1, 3, and 4 Note (1)	1
3.3.3 L01	CTS Table TS 3.5-6 Footnote (2), which is applicable to CTS Table TS 3.5-6 Functions 2, 6, and 8, states, in part, that with the number of OPERABLE accident monitoring instrumentation channels less than the required total number of channels shown in Column 1 of CTS Table TS 3.5-6, restore the inoperable channels to OPERABLE status within 14 days. CTS Table TS 3.5-6 Footnote (4), which is applicable to CTS Table TS 3.5-6 Functions 9, 10, and 11, states, in part, that with the number of OPERABLE accident monitoring instrumentation channels less than the required total number of channels shown in Column 1 of CTS Table TS 3.5-6, restore the inoperable channels to OPERABLE status within 7 days. If the channel is not restored within the 14 day or 7 day time period, Footnotes (2) and (4) require the unit to be in HOT STANDBY (equivalent to ITS MODE 2) within 6 hours and HOT SHUTDOWN (equivalent to ITS MODE 3) within the next 6 hours. Under similar conditions (i.e., one of the required channels of a Function inoperable), ITS 3.3.3 Required Action A.1 (which is applicable to all the above Functions) requires the inoperable channel to be restored OPERABLE status within 30 days. If the Required Action and Completion Time of Condition A is not met, then ITS 3.3.3 Required Action B.1 requires the immediate initiation of actions specified in Specification 5.6.4. This changes the CTS by allowing a longer time to restore the inoperable channel to OPERABLE status in ITS than is allowed in CTS and by deleting the requirements for the unit to be in HOT STANDBY and HOT SHUTDOWN with one of the required channels inoperable and not restored within the allowed restoration time, and instead requiring a report to be made in accordance with Specification 5.6.4.	3.3.3 ACTION A, 3.3.3 ACTION B	Table TS 3.5-6 Functional Unit 2, Functional Unit 6, Functional Unit 8, Functional Unit 9, Functional Unit 10, Functional Unit 11	3

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.3 L02	CTS Table TS 3.5-6 Footnote (1), which is applicable to CTS Table TS 3.5-6 Functions 2, 6, 8, 9, 10, and 11, states, in part, that with the number of OPERABLE accident monitoring instrumentation channels less than the minimum channels shown in Column 2 of CTS Table TS 3.5-6, restore the inoperable channels to OPERABLE status within 72 hours. Under similar conditions (i.e., two or more of the required channels of a Function inoperable), ITS 3.3.3 Required Action C.1 (which is applicable to all the above Functions) requires restoration of all but one of the inoperable channels to OPERABLE status within 7 days. This changes the CTS by allowing a longer time to restore an inoperable channel to OPERABLE status in the ITS than is allowed in CTS.	3.3.3 ACTION C	Table TS 3.5-6 Functional Units 2, Functional Unit 6, Functional Unit 8, Functional Unit 9, Functional Unit 10, Functional Unit 11	3
3.3.3 L03	CTS Table TS 4.1-1 Channel Description 16 requires a weekly CHANNEL CHECK of the Refueling Water Storage Tank Level channels. CTS Table TS 4.1-1 Channel Description 37 requires a daily CHANNEL CHECK of the Containment Pressure (Wide Range) channels. ITS Table 3.3.3-1 Functions 8 (Containment Pressure (Wide Range) and 20 (Refueling Water Storage Tank Level) require performance of a CHANNEL CHECK every 31 days (ITS SR 3.3.3.1). This changes the CTS by changing the Frequency from daily to 31 days for CTS Table TS 4.4-1 Channel Description 37 and from weekly to 31 days for CTS Table TS 4.4-1 Channel Description 16.	SR 3.3.3.1	Table TS 4.1-1 Channel Description 16, Channel Description 37	7
3.3.3 L04	CTS Table TS 4.1-1 Channel Description 36 requires the performance of a CHANNEL FUNCTIONAL TEST of the Reactor Coolant System Subcooling Monitor channel each refueling cycle. ITS Table 3.3.3-1 Function 18 (RCS Subcooling Margin Monitor) does not require this test. This changes the CTS by deleting the refueling cycle CHANNEL FUNCTIONAL TEST of the Reactor Coolant System Subcooling Monitor channels.	None	Table TS 4.1-1 Channel Description 36	5

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.5 L01	CTS 3.5.c states, in part, that when the number of channels of a subsystem fall below the limits given in Table TS 3.5-5 Column 3, operation shall be limited according to the requirement shown in Column 6 as soon as practicable. When the required number of channels per bus of CTS Table TS 3.5-5 Functional Unit 1 (Safeguards Bus Undervoltage) is not met, Column 3 requires one Safeguard Bus Undervoltage channel per bus be OPERABLE. Furthermore, the requirement in Column 3 is modified by Footnote (2), which states that when one component of a channel is taken out of service, that component shall be in the tripped condition. If the one required safeguard Bus Undervoltage channel for a bus is inoperable, then Table TS 3.5-5 Column 6 requires maintaining HOT SHUTDOWN or operating the diesel generator. When the one required Safeguards Bus Undervoltage is inoperable, ITS 3.3.5 ACTIONS A and B provide the appropriate compensatory measures. ITS 3.3.5 Required Action A.1 allows 1 hour to place the affected portion of the required channel in trip. However, as Noted, this Required Action is only allowed if the channel is inoperable due to one of the two relays being inoperable. If the channel is inoperable due to other reasons, then ITS 3.3.5 Required Action A.2 requires the required channel to be restored to OPERABLE status within 1 hour. If ITS 3.3.5 ACTION A is not met, ITS 3.3.5 ACTION B requires immediate entry into the applicable Condition(s) and Required Action(s) for the associated DG made inoperable by LOOP DG start instrumentation. This changes the CTS by providing a specific time to trip the channel (1 hour) and provides alternate actions in lieu of shutting down the unit to HOT SHUTDOWN or starting the associated DG.	3.3.5 ACTION A, 3.3.5 ACTION B	3.5.c, Table TS 3.5-5 Functional Unit 1	4
3.3.6 L01	Not Used			

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 3.8.a.1.b requires an OPERABLE automatic isolation valve under certain conditions. This is referring to the Containment Purge and Vent System valves, and thus includes the instruments that provide the isolation signal. The Specification is applicable during REFUELING OPERATIONS. This requirement can be met by an OPERABLE automatic isolation valve or a closed isolation valve. When this requirement is not being met, CTS 3.8.b provides actions to be taken if any of the specified limiting conditions in CTS 3.8.a are not met during REFUELING OPERATIONS. ITS 3.3.6 is applicable, in part, during movement of irradiated fuel assemblies within containment, as stated in footnote (a) to Table 3.3.6-1. This changes the CTS by requiring the containment purge and vent isolation instrumentation be OPERABLE during times of movement of irradiated fuel assemblies within containment, in lieu of during REFUELING OPERATIONS.	Table 3.3.6-1 Footnote (a)	3.8.a.1.b, 3.8.b	2
3.3.6 L03	CTS 3.8.a.1.b requires an OPERABLE automatic isolation valve under certain conditions. This is referring to the Containment Purge and Vent System valves, and thus includes the instruments that provide the isolation signal. The Specification is applicable during REFUELING OPERATIONS. When this requirement is not being met, the isolation valve must be closed or CTS 3.8.b requires refueling of the reactor to cease, initiation of action to restore the monitoring capability, and no operations be performed that could increase the reactivity of the core. Under similar conditions, ITS 3.3.6 does not require the refueling of the reactor to cease or require all operations that could increase the reactivity of the core to cease. With one radiation monitoring channel inoperable, ITS 3.3.6 ACTION A requires restoration of the affected channel to OPERABLE status within 4 hours. ITS 3.3.6 ACTION C, which is only applicable during the movement of irradiated fuel assemblies within containment, requires immediately placing and maintaining containment purge and vent valves in the closed position (Required Action C.1) or immediately entering the applicable Conditions and Required Actions of LCO 3.9.6 for containment purge and vent valves made inoperable by isolation instrumentation (Required Action C.2). Note that under this condition ITS LCO 3.9.6 would require suspension of movement of	3.3.6 ACTIONS A and C	3.8.b	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.6 L03 (continued)	irradiated fuel assemblies in containment. This changes the CTS by deleting the requirements to cease refueling of the reactor and that no operations be performed that could increase the reactivity of the core and provides new ACTIONS to restore the radiation monitors to service and maintain the containment boundary.	3.3.6 ACTIONS A and C	3.8.b	4
3.3.7 L01	CTS 3.12.b requires, with one train of the Automatic Actuation Logic and Actuation Relays Function inoperable (i.e., the associated CRPAR train is inoperable), to either restore the CRPAR train to OPERABLE status (i.e., by restoring the Automatic Actuation Logic and Actuation Relays train to OPERABLE status) within 7 days or the unit must be shutdown (to HOT SHUTDOWN – ITS equivalent MODE 3) in the next 12 hours. In addition, the CTS does not provide any Actions when both trains of the Automatic Actuation Logic and Actuation Relays Function are inoperable or when the Control Room Vent Radiation Monitor (i.e., both CRPAR trains are inoperable in both cases) in MODES 1 and 2. Thus a unit shutdown (to HOT SHUTDOWN – ITS equivalent MODE 3) is required. ITS 3.3.7 ACTION A allows 7 days to place the associated CRPAR train in the emergency mode when one Automatic Actuation Logic and Actuation Relays train is inoperable. When both Automatic Actuation Logic and Actuation Relays trains are inoperable or the Control Room Vent Radiation Monitor is inoperable, ITS 3.3.7 ACTION B allows either immediately placing one CRPAR train in the emergency mode and declaring the other CRPAR train inoperable (and entering the applicable Conditions and Required Actions of ITS 3.7.10) or immediately placing both CRPAR trains in the emergency mode. If either ACTION A or B is not met, ITS 3.3.7 ACTION C requires shutting down the unit to MODE 3 within 6 hours and MODE 5 within 36 hours. This changes the CTS by allowing the associated CRPAR trains to be placed in the emergency mode in lieu of requiring a unit shutdown. The change in the time to reach the shutdown condition and the requirement to place the unit in MODE 5 is discussed in DOC M01.	3.3.7 ACTION A 3.3.7 ACTION B	3.12.b	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.1 L01	CTS 3.10.l states, in part, that during steady-state power operations, the Reactor Coolant System (RCS) pressure shall be maintained within the limits specified in the COLR. ITS 3.4.1.a requires the RCS DNB parameters for pressurizer pressure to be within limits during MODE 1, but the Applicability is modified by a Note. The Note states that the pressurizer pressure limit does not apply during THERMAL POWER ramp > 5% RTP per minute or THERMAL POWER step > 10% RTP. This changes the CTS by allowing the pressurizer pressure limit to be outside of its limit during THERMAL POWER ramp > 5% RTP per minute or THERMAL POWER step > 10% RTP.	3.4.1	3.10.l	2
3.4.7 L01	ITS 3.4.7 LCO Note 2 allows one RHR loop to be inoperable for a period of up to 2 hours for Surveillance testing, provided that the other RHR loop is OPERABLE and in operation. The CTS does not contain this allowance; CTS 3.1.a.2.B requires both RHR trains to be OPERABLE at all times when in MODE 5 with the RCS loops filled. This changes the CTS by providing an allowance for one of the RHR loops to be inoperable for a limited period of time to perform required Surveillance testing.	LCO 3.4.7 Note 2	3.1.a.2.B	1
3.4.7 L02	CTS 3.1.a.2.B requires two RHR trains to be OPERABLE whenever the average reactor coolant temperature is $\leq$ 200ºF and irradiated fuel is in the reactor (i.e., ITS MODE 5). ITS LCO 3.4.7 provides an allowance that a steam generator with secondary side water level $\geq$ 5% can replace one of the two RHR trains. Furthermore, due to this allowance, the ITS provides alternate actions (ITS 3.4.7 Required Action A.2 and ACTION B) when only one RHR train is OPERABLE. In addition, ITS SR 3.4.7.2 requires verification every 12 hours that the secondary side water level of the required steam generator is $\geq$ 5%. This changes the CTS by only requiring one RHR train to be OPERABLE, provided the secondary side water level of a steam generator is $\geq$ 5%, and provides compensatory actions when this allowance is being used and is not met, as well as a Surveillance Requirement to periodically verify the limit is being met.	3.4.7 ACTION A, 3.4.7 ACTION B	3.1.a.2.B	1

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.8 L01	ITS 3.4.8 Note 2 allows one RHR loop to be inoperable for a period of ≤ 2 hours for Surveillance testing provided that the other RHR loop is OPERABLE and in operation. The CTS does not contain these allowances; CTS 3.1.a.2.B requires both RHR trains to be OPERABLE at all times when in MODE 5 with the RCS loops not filled. This changes the CTS by providing an allowance for one of the RHR loops to be inoperable for a limited period of time to perform required Surveillance testing.	LCO 3.4.8 Note 2	3.1.a.2.B	1
3.4.9 L01	CTS 3.1.a.6 does not provide any ACTIONS to take when the required group of pressurizer heaters are inoperable when the average RCS temperature is > 350°F (ITS MODES 1, 2, and 3). As a result, LCO 3.0.c would be entered, which requires action to be initiated within 1 hour, to be in HOT STANDBY (equivalent to ITS MODE 2) within the next 6 hours, to be in HOT SHUTDOWN (equivalent to ITS MODE 3) with the following 6 hours, and to be in COLD SHUTDOWN (equivalent to ITS MODE 5) within the subsequent 36 hours (although only CTS INTERMEDIATE SHUTDOWN is required to be entered since CTS 3.1.a.6 is required only when above 350ºF). ITS 3.4.9 ACTION B allows 72 hours to restore the inoperable pressurizer heater group to OPERABLE status, and if not restored, ITS 3.4.9 ACTION C requires the unit to be in MODE 3 within 6 hours and MODE 4 within 12 hours. This changes the CTS by providing specific ACTIONS when the pressurizer heaters are inoperable.	3.4.9 ACTION B 3.4.9 ACTION C	3.1.a.6	4
3.4.9 L02	Note 1 to CTS Table 4.1-3 requires, in part, that the pressurizer heaters be tested to verify OPERABILITY following maintenance on equipment that could affect the operation. ITS 3.4.9 does not include this requirement. This changes the CTS by eliminating a post-maintenance Surveillance Requirement.	None	Table 4.1-3 Note 1	5
3.4.11 L01	Note 1 to CTS Table 4.1-3 requires, in part, that the pressurizer PORVs and pressurizer PORV Block Valves be tested to verify OPERABILITY following maintenance on equipment that could affect the operation. ITS 3.4.11 does not include this requirement. This changes the CTS by eliminating a post-maintenance Surveillance Requirement.	None	Table 4.1-3 Note 1	5

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.14 L01	CTS 3.1.a.4.B requires that if the RCS PIV leakage is not within the limit, operation can 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. The term "are in" the mode corresponding to the isolated condition implies that this is an immediate action; no time is provided to place the penetration in the isolated condition. ITS 3.4.14 ACTION A contains this same requirement, 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 first valve from immediately to 4 hours and the second valve from immediately to 72 hours.	3.4.14 ACTION A	3.1.a.4.B	3
3.4.14 L02	CTS 3.1.a.4.C, in part, requires that if CTS 3.1.a.4.A and B cannot be met (i.e., an RCS PIV is not within leakage limits and the associated high pressure side of the penetration is not isolated within the required time), the reactor is required to be placed in HOT SHUTDOWN (equivalent to ITS MODE 3) in 4 hours and in INTERMEDIATE SHUTDOWN in the next 6 hours. Under similar conditions, ITS 3.4.14 Required Action B.1 requires the unit to be in MODE 3 in 6 hours. This changes the CTS by extending the time to be in MODE 3 from 4 hours to 6 hours.	3.4.14 ACTION B	3.1.a.4.C	3
3.4.14 L03	CTS 3.1.a.4.B includes a Note (Note 1) that describes that the isolated condition for a manual valve includes locking the valve in the closed position and for a motor operated valve includes locking out the power breaker. For a manual valve, ITS 3.4.14 Required Action A.1 only requires closing the manual valve; locking the valve is not required. For an automatic valve, ITS 3.4.14 Required Action A.1 only requires deactivating the valve (i.e., opening the power breaker), locking out the power breaker is not required. This changes the CTS by deleting the requirement to lock the manual valve in the closed position and lock out the motor operated valve power breaker.	3.4.14 ACTION A	3.1.a.4.B	4
3.4.14 L04	CTS 4.2.a.3.a 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 Surveillance Requirement.	None	4.2.a.3.a	5

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.14 L05	CTS 4.2.a.3.b provides additional compensatory measures to take, above those required by CTS 3.1.a.4.B, when leakage through an RCS PIV is not within the limit. The CTS requires a daily leakage test of the remaining OPERABLE RCS PIV in the flow path. 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	4.2.a.3.b	5
3.4.14 L06	CTS 4.5.b.2.F requires testing the RHR System valve interlocks once per operating cycle. When the interlock is inoperable, the CTS does not provide any actions to take. ITS 3.4.14 ACTION C has been added which requires the isolation of the penetration by use of one closed manual or deactivated power operated valve within 4 hours. This changes the CTS by allowing the penetration to be isolated and to continue operation of the unit for an unlimited amount of time without entry into CTS 3.0.c.	3.4.14 ACTION C	4.5.b.2.F	4
3.4.15 L01	CTS 3.1.d.4 states that either reactor coolant leak detection system may be out of operation for up to 12 hours provided at least one system is OPERABLE. When the containment sump monitor is inoperable, ITS 3.4.15 ACTION A allows 30 days to restore the required containment sump monitor to OPERABLE status (Required Action A.2). In addition, ITS 3.4.15 ACTION A also requires the performance of an RCS water inventory balance (i.e., SR 3.4.13.1) once per 24 hours during this 30 day period (Required Action A.1). This changes the CTS by allowing a longer period of time to restore the required containment sump to OPERABLE in the ITS than was allowed in the CTS.	3.4.15 ACTION A	3.1.d.4	4
3.4.15 L02	CTS 3.1.d.4 states that either reactor coolant leak detection system may be out of operation for up to 12 hours provided at least one system is OPERABLE. When the required containment atmosphere radioactivity monitor is inoperable, ITS 3.4.15 ACTION B requires an analysis of containment atmosphere grab samples be performed once per 24 hours (Required Action B.1.1) OR an RCS water inventory balance (i.e., SR 3.4.13.1) be performed once per 24 hours (Required Action B.1.2). In	3.4.15 ACTION B,	3.1.d.4	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.15 L02 (continued)	addition, ACTION B requires restoration of the required containment atmosphere radioactivity monitor to OPERABLE status within 30 days (Required Action B.2). During the 30 days allowed for restoration, Required Actions B.1.1 and B.1.2 will continue to be performed. This changes the CTS by allowing a longer period of time to restore the required containment atmosphere radioactivity monitor to OPERABLE in the ITS than was allowed in the CTS.	3.4.15 ACTION B,	3.1.d.4	4
3.4.16 L01	CTS 3.1.c.1.B requires the gross radioactivity due to nuclides with half-lives > 30 minutes excluding tritium to be $\leq$ 91/$\bar{E}$ µCi/cc. CTS 3.1.c.2.B states that if the limit is not met, then the unit must be shut down to INTERMEDIATE SHUTDOWN with an average coolant temperature < 500°F within 6 hours – no restoration time prior to the shutdown is provided. Furthermore, if the limit is not met, CTS 3.1.c.2.C requires the sample and analysis requirements of Table TS 4.1-2, item 1.f (an isotopic analysis for iodine), to be performed every 4 hours. Table TS 4.1-2, Item 1.a, requires a gross radioactivity determination (excluding tritium) 5 times per week, with a maximum time between tests of 3 days and item 1.e requires an $\bar{E}$ determination every 6 months with the sample being required after a minimum of 2 EFPD and 20 days of OPERATING MODE operation have elapsed since the reactor was last subcritical for $\geq$ 48 hours. ITS 3.4.16 does not include any requirements related to $\bar{E}$. ITS LCO 3.4.16 requires the DOSE EQUIVALENT XE-133 limit to be met. SR 3.4.16.1 states that the DOSE EQUIVALENT XE-133 must be $\leq$ 595 µCi/gm and requires verification of this limit every 7 days when in MODE 1. If DOSE EQUIVALENT XE-133 is not within the limit, ITS 3.4.16 ACTION B provides 48 hours to restore the DOSE EQUIVALENT XE-133 to within its limit prior to requiring a unit shutdown. It also allows LCO 3.0.4.c to be applicable when in ACTION B. Furthermore, when DOSE EQUIVALENT XE-133 is not within its limit, the ITS does not require the isotopic analysis for iodine to be performed every 4 hours. This changes the CTS by deleting the $\bar{E}$ requirements on primary coolant gross specific activity and replacing it with the DOSE EQUIVALENT XE-133 requirements on primary coolant noble gas activity, consistent with Technical Specification Task Force (TSTF) change traveler TSTF-490-A.	LCO 3.4.16, ITS 3.4.16 ACTION B	3.1.c.1.B, Table TS 4.1-2, item 1.f 3.1.c.2.B	1

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.16 L02	CTS Table TS 4.1-2 Item 1.c requires a monthly reactor coolant sample for tritium activity. ITS 3.4.16, including the incorporation of TSTF-490-A, does not include this requirement. This changes the CTS by deleting this Surveillance Requirement.	None	Table TS 4.1-2 Item 1.c	5
3.5.1 L01	CTS 3.3.a.2, in part, requires that when an accumulator is inoperable and a unit shutdown is required, the unit must be in COLD SHUTDOWN (ITS equivalent MODE 5) within an additional 36 hours (after the time to reach HOT STANDBY and HOT SHUTDOWN). ITS 3.5.1 Required Action C.2 only requires that the unit reduce RCS pressure to ≤ 1000 psig. This deletes the requirement to be in COLD SHUTDOWN (equivalent to ITS MODE 5) within an additional 36 hours.	3.5.1 ACTION C	3.3.a.2	4
3.5.2 L01	CTS 3.3.b.2 states that during power operation or recovery from an inadvertent trip, one SI/RHR train may be inoperable for a period of 72 hours. ITS 3.5.2 ACTION A states when one or more trains are inoperable, restore the trains to OPERABLE status within 72 hours. ITS 3.5.2 ACTION C states that with less than 100% of the ECCS flow equivalent to a single OPERABLE ECCS train available, enter LCO 3.0.3 immediately. This changes the CTS by allowing combinations of equipment from both trains to be credited as meeting the ECCS safety function provided 100% of the ECCS flow equivalent to a single OPERABLE ECCS train is available. For example, under the CTS, an inoperable safety injection pump in one train and an inoperable residual heat removal pump in the other train would require a CTS 3.0.c entry. Under the ITS, the same condition would allow 72 hours before requiring a shutdown because the remaining OPERABLE safety injection pump and residual heat removal pump are capable of producing the flow equivalent to a single OPERABLE train.	3.5.2 ACTION A 3.5.2 ACTION C	3.3.b.2	4
3.5.2 L02	CTS 4.5.a.1.A states, in part, a test safety injection signal will be applied to initiate operation of the system for the Safety Injection System test. ITS SR 3.5.2.5 and SR 3.5.2.6 require verification of each ECCS valve actuating and pump starting automatically on an actual or simulated (i.e., test signal) actuation signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test.	SR 3.5.2.5, SR 3.5.2.6	4.5.a.1.A	6

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.5.2 L03	CTS 3.3.b.2.A, in part, requires that when an SI train is inoperable and a unit shutdown is required, the unit must be in COLD SHUTDOWN (ITS equivalent MODE 5) within an additional 36 hours (after the time to reach HOT STANDBY and HOT SHUTDOWN). ITS 3.5.2 Required Action B.2 only requires the unit to be in MODE 4 in 12 hours. This deletes the requirement to be in COLD SHUTDOWN (equivalent to ITS MODE 5) within an additional 36 hours and adds a requirement to be in MODE 4 within 12 hours.	3.5.2 ACTION B	3.3.b.2.A	4
3.5.2 L04	CTS 4.5.b.1.A requires the ECCS pumps to be started and operated every quarter during power operation and "within 1 week after the plant is returned to power operation, if the test was not performed during plant shutdown." This implies that even if the test were performed just prior to a unit shutdown, that it must be re-performed within one week after the plant startup if not performed during the plant shutdown, even if the test is still current (i.e., has been performed within the previous quarter). ITS SR 3.5.2.4 only requires this test to be performed every 92 days. This changes the CTS by reducing the Frequency for performing the ECCS pump tests by allowing the test to not be performed within 1 week after a unit startup if the Surveillance is still current (i.e., it has been performed within the previous 92 days).	SR 3.5.2.4	4.5.b.1.A	7

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.2 L01	CTS 3.6.a does not provide any ACTIONS to take when one or more air locks are inoperable due to the leakage rate limits not met (door seal leakage or overall leakage) or at least one door not closed in each air lock. As a result, LCO 3.0.c would be entered, which requires action to be initiated within 1 hour, to be in HOT STANDBY (equivalent to ITS MODE 2) within the next 6 hours, to be in HOT SHUTDOWN (equivalent to ITS MODE 3) within the following 6 hours, and to be in COLD SHUTDOWN (equivalent to ITS MODE 5) within the subsequent 36 hours. In the ITS, ACTIONS are provided to allow inoperability of one or both air locks for longer than the current 1 hour provided in LCO 3.0.c. As Noted in ACTIONS Note 2, the ITS ACTIONS allow separate Condition entry for each air lock – the ACTIONS are to be taken on a per air lock basis. When one door in one or both air locks is inoperable (e.g., due to door leakage rate limits not being met), ITS 3.6.2 ACTION A requires: a) verifying the remaining OPERABLE door is closed in the affected air lock within 1 hour; b) locking the OPERABLE door closed in the affected air lock within 24 hours; and c) verifying the OPERABLE door is locked closed in the affected air lock once per 31 days. A Note allows this specific Required Action to be met by administrative means if the air lock doors are in high radiation areas. Furthermore, ITS 3.6.2 ACTION A includes two Notes, one which states that the three Required Actions do not have to be met if both doors in the same air lock are inoperable and Condition C is entered and the second which allows entry and exit through the OPERABLE door for 7 days under administrative controls if both air locks are inoperable. When one or more air locks are inoperable for reasons other than one door being inoperable or the interlock mechanism being inoperable (see DOC M01), ITS 3.6.2 ACTION C requires: a) action to be immediately initiated to evaluate overall containment leakage rate per LCO 3.6.1; b) verifying a door is closed in the affected air lock within 1 hour; and c) restoring the air lock to OPERABLE status within 24 hours. If any of the above actions are not met, then the ITS will require a unit shutdown as described in DOC M02. In addition, both ACTIONS are modified by two additional Notes. ACTIONS Note 1 states that entry and exit is permissible to perform repairs on the affected air lock components and ACTIONS Note 3 states to enter applicable Conditions and Required Actions of LCO 3.6.1, "Containment," when air lock leakage results in	3.6.2 ACTIONS A and C, 3.6.2 ACTIONS Note 1, 2, and 3	3.0.c	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.2 L01 (continued)	exceeding the overall containment leakage rate. This changes the CTS by providing specific ACTIONS when either or both of the containment air locks are inoperable.	3.6.2 ACTIONS A and C, 3.6.2 ACTIONS Note 1, 2, and 3	3.0.c	4
3.6.3 L01	CTS 3.6.b.3.A.2, 3.6.b.3.B.2, and 3.6.b.3.C.2 require verification that specified containment penetrations are isolated. ITS 3.6.3 Required Actions A.2 and C.2 include similar requirements, but contain a Note (Note 2) that allows verification of isolation devices that are locked, sealed, or otherwise secured to 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 Note 2	3.6.b.3.A.2, 3.6.b.3.B.2, 3.6.b.3.C.2	4
3.6.3 L02	Note 1 to CTS Table TS 4.1-3 requires, in part, that the containment isolation trip (i.e., the containment isolation valves) be tested to verify OPERABILITY following maintenance on equipment that could affect the operation. ITS 3.6.3 does not include this requirement. This changes the CTS by eliminating a post-maintenance Surveillance Requirement.	None	Table TS 4.1-3 Equipment Tests 4 and 16 footnote 1	5
3.6.3 L03	CTS Table TS 4.1-3 Equipment Test 4 requires an OPERABILITY test on the Containment Isolation Trip each REFUELING cycle. This verification ensures that each automatic containment isolation valve that receives a containment isolation signal 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 on an actual or simulated actuation signal. This changes the CTS by excluding those automatic valves that are locked, sealed or otherwise secured in position from the verification. The change that adds the "actual" actuation signal allowance is discussed in DOC L04.	SR 3.6.3.6	Table TS 4.1-3 Equipment Test 4	5

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.3 L04	CTS Table TS 4.1-3 Equipment Test 4 requires an OPERABILITY test on the Containment Isolation Trip each REFUELING cycle. This verification ensures that each automatic containment isolation valve that receives a containment isolation signal actuates to its isolation position. CTS 4.4.e requires the vacuum relief butterfly valves to be tested each refueling outage to ensure they close on a simulated accident signal. 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 on an actual or simulated actuation signal. This changes the CTS by allowing use of either an actual or simulated signal for the test. The change that excepts valves that are locked, sealed, or otherwise secured in position is discussed in DOC L03.	SR 3.6.3.6	Table TS 4.1-3 Equipment Test 4, 4.4.e	6

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.3 L05	CTS 6.20, which provides the Containment Leakage Rate Testing Program requirements, includes additional leakage limits on penetrations which extend into the auxiliary building special ventilation zone and penetrations which are exterior to both the shield building and the auxiliary building special ventilation zone (i.e., combined bypass leakage rate limits). CTS 6.20 includes an additional requirement that if the leak rates are exceeded, repairs and retest shall be performed to demonstrate reduction of the combined leak rate to the limits, but no specific time is provided to perform the repairs and retest. However, since CTS 6.20 provides all the Containment Leakage Rate Testing Program limits, it can be concluded that these leakage rate limits are part of CONTAINMENT SYSTEM INTEGRITY. CTS 3.6.a, which provides the requirements for CONTAINMENT SYSTEM INTEGRITY, also does not provide any explicit time to restore the combined leakage rate limits prior to requiring a unit shutdown. As a result, LCO 3.0.c would be entered, which requires action to be initiated within 1 hour, and to be in HOT STANDBY (equivalent to ITS MODE 2) within the next 6 hours, in HOT SHUTDOWN (equivalent to ITS MODE 3) within the following 6 hours, and in COLD SHUTDOWN (equivalent to ITS MODE 5) within the subsequent 36 hours. Under similar conditions, ITS 3.6.3 ACTION D provides 4 hours to restore the combined bypass leakage rate to within limits prior to requiring a unit shutdown. This changes the CTS by providing an explicit ACTION to allow time to restore combined bypass leakage rate to within limits prior to requiring a unit shutdown, and changes the time from 1 hour (as provided in CTS 3.0.c) to 4 hours.	3.6.3 ACTION D	3.0.c 6.20	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.5 L01	CTS 3.6.e does not provide any explicit time to restore the containment ambient temperature to within limit when containment ambient temperature is not maintained within limit prior to requiring a unit shutdown. As a result, LCO 3.0.c would be entered, which requires action to be initiated within 1 hour, and to be in HOT STANDBY (equivalent to ITS MODE 2) within the next 6 hours, in HOT SHUTDOWN (equivalent to ITS MODE 3) with the following 6 hours, and in COLD SHUTDOWN (equivalent to ITS MODE 5) within the subsequent 36 hours. Under similar conditions, ITS 3.6.5 ACTION A provides 8 hours to restore the containment temperature to within the limit prior to requiring a unit shutdown. This changes the CTS by providing an explicit ACTION to allow time to restore the containment air temperature to within the limit prior to requiring a unit shutdown, and changes the time from 1 hour (as provided in CTS 3.0.c) to 8 hours. The discussion of change if the Required Action and associated Completion Time are not met (ITS 3.6.5 ACTION B) is provided in DOC M02.	3.6.5 ACTION A	3.0.c	4
3.6.6 L01	CTS 3.3.c.1 does not provide an Action when two containment cooling trains are inoperable. Thus, CTS 3.0.c would be required to be entered, and a unit shutdown commenced. When one fan-coil unit in both containment air cooling trains are inoperable, ITS 3.6.6 ACTION D will allow 72 hours to restore one inoperable containment air cooling train to OPERABLE status prior to requiring a unit shutdown. This changes the CTS by allowing 72 hours to restore an inoperable containment air cooling train when both trains are inoperable prior to requiring a unit shutdown.	3.6.6 ACTION D	3.0.c	4
3.6.6 L02	CTS 4.5.a.2.A states, in part, that a Containment Vessel Internal Spray System test "shall be performed" every 18 months. CTS 4.5.a.3 states, in part, that each containment fancoil unit "shall be tested" every 18 months. ITS SR 3.6.6.5, SR 3.6.6.6, and SR 3.6.6.7 require verification that the containment spray valves, containment spray pumps, and containment cooling trains, respectively, actuate or start automatically on an actual or simulated (i.e., test signal) actuation signal. This changes the CTS by allowing use of either an actual or simulated signal for the test.	SR 3.6.6.5, SR 3.6.6.6, SR 3.6.6.7	4.5.a.2.A, 4.5.a.3	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	CTS 4.5.a.2.A requires a System test of the Containment Spray System, which includes verification that each automatic containment spray valve in the flow path actuates to its correct position. ITS SR 3.6.6.5 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 automatic valves that are locked, sealed, or otherwise secured in position from the verification.	SR 3.6.6.5	4.5.a.2.A	5
3.6.6 L04	CTS 3.3.c.1.A.3 requires, in part, that if the containment spray train is not returned to OPERABILITY within the time specified in CTS 3.3.c.1.A.3.(i), then, within 1 hour, initiate action to achieve HOT STANDBY within 6 hours, achieve HOT SHUTDOWN within the following 6 hours, and achieve COLD SHUTDOWN (equivalent to ITS MODE 5) within an additional 36 hours. For Containment Spray System inoperabilities, ITS 3.6.6 ACTION B requires the unit to be in MODE 3 within 6 hours and in MODE 5 within 84 hours. This change extends the time to be in MODE 5 from 48 hours to 84 hours. The change in the requirements to be in HOT STANDBY and HOT SHUTDOWN is discussed in DOC M03.	3.6.6 ACTION B	3.3.c.1.A.3	3
3.6.6 L05	CTS 4.5.b.1.A requires the containment spray pumps to be started and operated every quarter during power operation and "within 1 week after the plant is returned to power operation, if the test was not performed during plant shutdown." This implies that even if the test were performed just prior to a unit shutdown, that it must be re-performed within one week after the plant startup if not performed during the plant shutdown, even if the test is still current (i.e., has been performed within the previous quarter). ITS SR 3.6.6.4 only r equires this test to be performed every 92 days. This changes the CTS by reducing the Frequency for performing the containment spray pump tests by allowing the test to not be performed within 1 week after a unit startup if the Surveillance is still current (i.e., it has been performed within the previous 92 days).	SR 3.6.6.4	4.5.b.1.A	7
3.6.7 L01	CTS 4.5.b.2.D states, in part, that the spray additive tank valves shall be tested during each major REFUELING outage. ITS SR 3.6.7.4 requires verification that spray additive actuates to the correct position on an actual or simulated (i.e., test) actuation signal. This changes the CTS by allowing use of either an actual or simulated signal for the test.	SR 3.6.7.4	4.5.b.2.D	6

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.7 L02	CTS 3.3.c.2.A.3 requires, in part, that if the spray additive system is not returned to OPERABILITY within 72 hours, then, within 1 hour, initiate action to achieve HOT STANDBY within 6 hours, achieve HOT SHUTDOWN within the following 6 hours, and achieve COLD SHUTDOWN (equivalent to ITS MODE 5) within an additional 36 hours. ITS 3.6.7 ACTION B requires the unit to be in MODE 3 within 6 hours and in MODE 5 within 84 hours. This change extends the time to be in MODE 5 from 48 hours to 84 hours. The change in the requirements to be in HOT STANDBY and HOT SHUTDOWN is discussed in DOC M03.	3.6.7 Required Action B.2	3.3.c.2.A.3	3
3.6.8 L01	CTS 3.6.a does not provide any explicit time to restore the shield building portion of the containment to OPERABLE status when it is found inoperable prior to requiring a unit shutdown. As a result, LCO 3.0.c would be entered, which requires action to be initiated within 1 hour, and to be in HOT STANDBY (equivalent to ITS MODE 2) within the next 6 hours, in HOT SHUTDOWN (equivalent to ITS MODE 3) with the following 6 hours, and in COLD SHUTDOWN (equivalent to ITS MODE 5) within the subsequent 36 hours. Under similar conditions, ITS 3.6.8 ACTION A provides 24 hours to restore the shield building to OPERABLE status prior to requiring a unit shutdown. This changes the CTS by providing an explicit ACTION to allow time to restore an inoperable shield building to OPERABLE status prior to requiring a unit shutdown, and changes the time from 1 hour (as provided in CTS 3.0.c) to 24 hours. The discussion of change if the Required Action and associated Completion Time are not met (ITS 3.6.8 ACTION B) is provided in DOC M01.	3.6.8 ACTION A	3.0.c	4
3.6.8 L02	CTS 4.4.c.4 requires each Shield Building Ventilation System train to be determined OPERABLE at the time of its periodic test by producing a measurable vacuum in the annulus within 2 minutes after the train is started. CTS 4.4.c.1 specifies that the normal periodic test of the Shield Building Ventilation System trains is once per operating cycle (which is defined as 18 months) or 18 months, whichever comes first. ITS SR 3.6.8.2 requires a similar test (as modified by DOCs A03, M03, and LA02), however it is required to be performed using one Shield Building Ventilation System train every 18 months "on a STAGGERED TEST BASIS." This changes the CTS by requiring the test to be performed using each Shield Building Ventilation System train at least once per 36 months.	SR 3.6.8.2	4.4.c.4	7

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.9 L01	CTS 3.6.a does not provide any explicit time to restore the vacuum relief lines portion of the containment to OPERABLE status when one vacuum relief line is found inoperable prior to requiring a unit shutdown. As a result, LCO 3.0.c would be entered, which requires action to be initiated within 1 hour and to be in HOT STANDBY (equivalent to ITS MODE 2) within the next 6 hours, in HOT SHUTDOWN (equivalent to ITS MODE 3) within the following 6 hours and in COLD SHUTDOWN (equivalent to ITS MODE 5) within the subsequent 36 hours. Under similar conditions, ITS 3.6.9 ACTION A provides 72 hours to restore one vacuum relief line to OPERABLE status prior to requiring a unit shutdown. This changes the CTS by providing an explicit ACTION to allow time to restore an inoperable vacuum breaker line to OPERABLE status prior to requiring a unit shutdown and changes the time from 1 hour (as provided in CTS 3.0.c) to 72 hours. The discussion of the change if the Required Action and associated Completion Time are not met (ITS 3.6.9 ACTION B) is provided in DOC M01. Note that when both vacuum relief lines are inoperable, ITS LCO 3.0.3, which is equivalent to CTS 3.0.c, would apply.	3.6.9 ACTION A	3.0.c	4
3.6.10 L01	CTS 4.4.c.1.b requires the automatic initiation of each train of the Shield Building Ventilation System (SBVS) at least once per operating cycles or once every 18 months, whichever occurs first. ITS 3.6.10.3 requires verification that each SBVS train actuates on an actual or simulated actuation signal every 18 months. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test. The change discussion regarding the use of every 18 months is provided in DOC A03.	SR 3.6.10.3	4.4.c.1.b	6

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 3.4.a.3 states that with one or more MSSVs inoperable, they must be returned to OPERABLE status within 48 hours or a unit shutdown is required. ITS 3.7.1 ACTION A provides the requirements when one or more SGs have one MSSV inoperable and the moderator temperature coefficient (MTC) is zero or negative at all power levels, and requires a reduction in THERMAL POWER to 55% RTP. ITS 3.7.1 ACTION B provides the requirements when one or more SGs have one MSSV inoperable and the MTC is positive at any power level or one or more SGs have two or three MSSVs inoperable, and requires a reduction in power level to less than the Maximum Allowable %RTP specified in Table 3.7.1-1 for the number of OPERABLE MSSVs. In addition, when in MODE 1, the Power Range Neutron Flux – High reactor trip setpoint must be reduced within 36 hours to less than or equal to the Maximum Allowable %RTP specified in table 3.7.1-1 for the number of inoperable MSSVs. The Table 3.7.1-1 Maximum Allowable Power for one inoperable MSSV is 48% RTP, for two inoperable MSSVs is 33% RTP, and for three inoperable MSSVs is 19% RTP. This changes the CTS by allowing power operation to continue for an unlimited amount of time provided THERMAL POWER is reduced to a predetermined value and in some cases, the Power Range Neutron Flux – High setpoint reduced similarly.	3.7.1 ACTIONS A and B	3.4.a.3	4
3.7.2 L01	CTS 3.6.b requires the MSIVs to be OPERABLE when CONTAINMENT INTEGRITY is required. CTS 3.6.a requires CONTAINMENT SYSTEM INTEGRITY in all conditions, except COLD SHUTDOWN with the vessel head installed and REFUELING (i.e., it is required 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.b.4, the unit must be in HOT STANDBY (MODE 2) within 6 hours, HOT SHUTDOWN (MODE 3) within the following 6 hours, and in COLD SHUTDOWN (MODE 5) within the subsequent 36 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 and de-activated. 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 making the Specification not applicable in MODES 2 and 3 when all MSIVs are	3.7.2 ACTION D	3.6.b	2

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.2 L01 (continued)	closed and de-activated, and in MODE 4. 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 to the requirements to be in HOT STANDBY and HOT SHUTDOWN are described in DOC M03.	3.7.2 ACTION D	3.6.b	2
3.7.2 L02	CTS 4.7 states that the main steam isolation valves shall be tested once per operating cycle to verify a closure time of 5 seconds or less. ITS SR 3.7.2.1 requires a similar test, but Note modifying ITS SR 3.7.2.1 allows that the SR is not required to be performed in MODES 2 and 3 until 12 hours after the MSIVs are open. This changes the CTS by allowing entry into MODES 2 and 3 under certain conditions without performing the Surveillance Requirement.	SR 3.7.2.1 Note	4.7	7
3.7.3 L01	CTS 3.6.b requires the MFIVs to be OPERABLE when CONTAINMENT SYSTEM INTEGRITY is required. CTS 3.6.a requires CONTAINMENT SYSTEM INTEGRITY in all conditions, except COLD SHUTDOWN and REFUELING (i.e., it is required in MODES 1, 2, 3, and 4). Furthermore, when one or more MFIVs are inoperable and a unit shutdown is required by CTS 3.6.b.4, the unit must be in HOT STANDBY (MODE 2) within 6 hours, HOT SHUTDOWN (MODE 3) within the following 6 hours, and in COLD SHUTDOWN (MODE 5) within the subsequent 36 hours. ITS 3.7.3 requires the MFIVs to be OPERABLE in MODES 1, 2, and 3 except when all MFIVs, MFRVs, and associated bypass valves are closed and de-activated. When a shutdown of the unit is required due to an inoperable MFIV, 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 making the Specification not applicable in MODES 1, 2, and 3 when all MFIVs, MFRVs, and associated bypass valves are closed and de-activated and by deleting the MODE 4 requirements. 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 to the requirements to be in HOT STANDBY and HOT SHUTDOWN are described in DOC M03 CTS 3.6.b.3.A.1 allows 24 hours to isolate the affected penetration when one or more of the MFIVs are inoperable. ITS 3.7.3 Required Action A.1 will allow 72 hours to close or isolate the MFIV when a MFIV is inoperable, and once isolated, will require verification that the flow path remains isolated every 7 days. This changes the CTS by extending the Completion Time from 24 hours to 72 hours when a MFIV is inoperable.	3.7.3 Applicability, 3.7.3 ACTION E	3.6.b, 3.6.b.4	2

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.5 L01	CTS 3.4.b.4.A requires an inoperable train of auxiliary feedwater be restored to OPERABLE status within 72 hours. ITS 3.7.5 ACTION A permits 7 days to restore an inoperable turbine-driven AFW train if it is inoperable in MODE 3 following refueling. This changes the CTS by extending the restoration time from 72 hours for 7 days for an inoperable turbine-driven AFW train in MODE 3 following refueling.	3.7.5 ACTION A	3.4.b.4.A	4
3.7.5 L02	CTS 3.4.b.4.B allows two inoperable auxiliary feedwater trains to be inoperable for 4 hours. ITS 3.7.5 ACTION C specifies that with the turbine driven AFW inoperable due to one inoperable steam supply and one motor driven AFW train inoperable, to restore the steam supply on the turbine driven train to OPERABLE status within 48 hours or to restore the motor driven AFW train to OPERABLE status within 48 hours. This changes the CTS by extending the restoration time from 4 hours to 48 hours when the turbine-driven AFW train is inoperable due to one inoperable steam supply concurrent with an inoperable motor-driven AFW train.	3.7.5 ACTION C	3.4.b.4.B	4
3.7.5 L03	CTS 3.4.b, in part, requires AFW trains to be capable of taking suction from the Service Water System. CTS 4.8.d requires that the service water valves to the auxiliary feedwater pump suctions shall be tested by operator action following the auxiliary feedwater pump tests. ITS 3.7.5 does not contain these requirements. This changes the CTS by deleting these requirements from the CTS.	None	3.4.b, 4.8.d	5
3.7.5 L04	CTS 3.4.b.1.A and B require three trains of AFW to be Operable. In addition, CTS 3.4.b.3 states that reactor power shall not be increased above 1673 MWt unless three trains of AFW are OPERABLE. ITS 3.7.5 does not have this power restriction when one or more AFW trains are inoperable. This changes the CTS by deleting a power restriction when one or more trains of AFW are inoperable.	None	3.4.b.1.A, 3.4.b.1.B, 3.4.b.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 L05	CTS 3.4.b.1.B requires the turbine driven AFW train to be capable of delivering flow to both steam generators. When the quarterly pump test of CTS 4.8.a is performed on the motor driven AFW pumps, one of the AFW header cross-tie valves is closed so that the motor driven AFW pump being tested will only pump to one of the SGs. When either of these valves is closed to perform this testing, KPS declares the turbine driven AFW train inoperable since the turbine driven AFW train cannot automatically provide flow to both SGs. In addition, during this test the motor driven AFW pump is also inoperable. Thus, two AFW trains are inoperable when either of the motor driven AFW pumps is being tested as required by CTS 4.8.a. This requires entry into CTS 3.4.b.4.B, which allows 4 hours to restore one of the two inoperable trains to OPERABLE status. The ITS does not provide any restoration time when two AFW trains are inoperable. ITS 3.7.5 ACTION C requires a shutdown to MODE 3 within 6 hours and to MODE 4 within 18 hours. However, ITS SR 3.7.5.1, which requires verification that each manual, power operated, and automatic valve in each water flow path that is not locked sealed, or otherwise secured in position, is in the correct position, has been modified by Note 2. This Note states that one AFW header cross-tie valve is allowed to be closed for up to 4 hours during testing of the motor driven AFW pump and the turbine driven AFW train may be considered OPERABLE, provided the cross-tie valve is capable of being remotely realigned. This changes the CTS by allowing the turbine driven AFW train to be considered OPERABLE during motor driven AFW pump testing when an AFW header cross-tie valve is closed (i.e., not in its normal open position).	SR 3.7.5.1 Note 2	3.4.b.1.B	1
3.7.6 L01	With the CSTs inoperable, CTS 3.4.c.2 requires restoration of the CSTs within 48 hours. ITS 3.7.6 Required Action A.1 requires verification of the 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. This changes the CTS by allowing verification of the backup water supply's OPERABILITY and extending the Completion Time for restoration of the CSTs to 7 days.	3.7.5 ACTION A	3.4.c.2	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	CTS 3.12.b requires both trains of the Control Room Post-Accident Recirculation (CRPAR) System to be OPERABLE. Included as part of the OPERABILITY of the CRPAR trains is the control room boundary. CTS 3.12.b provides the actions for when one CRPAR train is inoperable, however no actions are provided when both trains are inoperable, such as when the control room boundary is inoperable. In this situation, a reactor shutdown is required. In addition, CTS 3.12 does not address the control room boundary being opened intermittently (such as for routine entry and exit) under administrative controls. ITS LCO 3.7.10 also requires two CRPAR trains to be OPERABLE, however a Note to the LCO is included that allows the control room boundary to be opened intermittently under administrative controls. ITS 3.7.10 ACTION B provides actions for when the control room boundary is inoperable in MODE 1, 2, 3, or 4. The action allows up to 24 hours to restore the control room boundary before requiring a unit shutdown. Furthermore, due to the addition of ITS 3.7.10 ACTION B, an action has been added (ITS 3.7.10 ACTION F) to cover the instances where both CRPAR trains are inoperable in MODE 1, 2, 3, or 4 for reasons other than an inoperable control room boundary. The proposed ACTION will require a unit shutdown per LCO 3.0.3. This changes the CTS by specifying the allowance for intermittently opening the control room boundary under administrative controls and not consider the CRPAR System to be inoperable and provides time to restore an inoperable control room boundary prior to requiring a unit shutdown.	LCO 3.7.10 Note, 3.7.10 ACTIONS B and F	3.12.b	4
3.7.10 L02	CTS 4.17.a.2 requires verification of the automatic initiation of the CRPAR System upon receipt of the specified inputs (i.e., a high radiation signal and a safety injection signal) but does not specify the source of the input signal. ITS SR 3.7.10.3 requires a verification that each CRPAR train actuates on an "actual" or "simulated" actuation signal. This changes the CTS by explicitly specifying that the actuation signal may be either actual or simulated.	SR 3.7.10.3	4.17.a.2	6
3.7.10 L03	CTS 4.17.b.4 requires each CRPAR train to be operated at least 10 hours each month. ITS SR 3.7.10.1 requires each CRPAR train to be operated ≥ 15 minutes every 31 days. This changes the CTS by reducing the time required to operate each CRPAR train.	SR 3.7.10.1	4.17.b.4	6

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.12 L01	CTS 4.4.c.1.b requires the automatic initiation of each train of the Auxiliary Building Special Ventilation (ASV) System at least once per operating cycle or once every 18 months, whichever occurs first. ITS 3.7.12.3 requires verification that each ASV System train actuates on an actual or simulated actuation signal every 18 months. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test. The change discussion regarding the use of every 18 months is provided in DOC A03.	SR 3.7.12.3	4.4.c.1.b	6
3.7.12 L02	CTS 4.4.d.3 requires each Auxiliary Building Special Ventilation System train to be determined OPERABLE at the time of the periodic test if it starts with a coincident isolation of the normal ventilation ducts and produces a measurable vacuum throughout the special ventilation zone with respect to the outside atmosphere. CTS 4.4.c.1 specifies that the normal periodic test of the ASV system is once per operating cycle (which is defined as 18 months) or 18 months, whichever comes first. ITS SR 3.7.12.4 requires a similar test (as modified by DOCs A03 and M01), however it is required to be performed using one ASV System train every 18 months "on a STAGGERED TEST BASIS." This changes the CTS by requiring the test be performed using each ASV System train at least once per 36 months.	SR 3.7.12.4	4.4.d.3	7
3.7.12 L03	CTS 3.6.c.2 states, in part, that both trains of the Auxiliary Building Special Ventilation (ASV) System shall be OPERABLE, but does not allow the ASV boundary to be opened intermittently. ITS 3.7.12 contains an LCO Note which allows the ASV boundary to be opened intermittently under administrative control. This changes the CTS by allowing the ASV boundary to be opened intermittently under administrative control.	LCO 3.7.12 Note	None	1

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 3.6.c.2 requires, in part, that both trains of the Auxiliary Building Special Ventilation (ASV) System shall be OPERABLE, but does not provide Actions to take if both trains are inoperable due to an inoperable ASV boundary. Therefore, with two trains of the ASV inoperable due to an inoperable ASV boundary, CTS 3.0.c must be entered. CTS 3.0.c requires action to be initiated within 1 hour, to be in HOT STANDBY (equivalent to ITS MODE 2) in the following 6 hours, to be in HOT SHUTDOWN (equivalent to ITS MODE 3) in the following 6 hours, and to be in COLD SHUTDOWN (equivalent to ITS MODE 5) in the subsequent 36 hours. ITS 3.7.12 ACTION B requires restoration of the ASV boundary to OPERABLE status within 24 hours if the two ASV trains are inoperable due to an inoperable ASV boundary. This changes the CTS by providing ACTION for restoration when both trains of the ASV are inoperable due to the ASV boundary being inoperable.	3.7.12 ACTION B	3.0.c	3
3.7.14 L01	CTS 5.4.a.3 is applicable, in part, when there is fuel in the pool. ITS 3.7.14 is applicable when fuel assemblies are stored in the spent fuel pool and a spent fuel pool verification has not been performed since the last movement of fuel assemblies in the spent fuel pool. This changes the CTS by reducing the Applicability of the Spent Fuel Pool Boron Concentration Specification to only the time when fuel assemblies are stored in the spent fuel pool and a spent fuel pool verification has not been performed since the last movement of fuel assemblies in the spent fuel pool.	3.7.14 Applicability	5.4.a.3	2

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.14 L02	CTS 5.4.a.3 requires the spent fuel pool boron concentration to match that in the refueling cavity and refueling canal during refueling operations or whenever there is fuel in the pool. Currently, the refueling cavity and refueling canal boron limit is provided in the COLR. The current COLR limit is ≥ 2500 ppm. ITS 3.7.14 requires the boron concentration of the spent fuel pool to be ≥ 240 ppm when fuel assemblies are stored in the spent fuel pool and a spent fuel pool verification has not been performed since the last movement of fuel assemblies in the spent fuel pool. This changes the CTS by reducing the LCO limit from the value specified in the COLR for the RCS during refueling operations (currently ≥ 2500 ppm) to ≥ 240 ppm. The change in the spent fuel pool boron concentration Applicability related to the pool itself (adding the spent fuel pool verification allowance) is discussed in DOC L01 and the Applicability related to "during REFUELING OPERATIONS" is covered in ITS 3.9.1.	LCO 3.7.14	5.4.a.3	1
3.7.16 L01	CTS Table TS 4.1-2 Sampling Test 7 requires the secondary coolant be tested for gross beta and gamma activity on a weekly basis. ITS 3.7.16 does not contain this Surveillance Requirement. This changes the CTS by deleting this Surveillance Requirement.	None	Table TS 4.1-2 Sampling Test 7	5
3.7.16 L02	CTS Table TS 4.1-2 Sampling Test 7 requires the secondary coolant be tested for iodine concentration on a weekly basis when the gross beta and gamma activity is ≥ 0.1 µCi/gram. ITS SR 3.7.16.1 requires a verification of the specific activity of the secondary coolant for iodine concentration every 31 days. This changes the CTS by changing the Surveillance Frequency from weekly under certain conditions to once every 31 days.	SR 3.7.16.1	Table TS 4.1-2 Sampling Test 7	7
3.7.16 L03	CTS 3.4.d.3 requires that if the requirement of CTS 3.4.d.2 cannot be met, then, within 1 hour, initiate action to achieve HOT STANDBY within 6 hours, HOT SHUTDOWN within the following 6 hours, and reduce the Reactor Coolant System temperature < 350°F within an additional 12 hours. ITS 3.7.16 ACTION A requires that the unit be in MODE 3 (equivalent to CTS HOT SHUTDOWN) within 6 hours and to be in MODE 5 (equivalent to CTS COLD SHUTOWN) within 36 hours. This change deletes the requirement to reduce RCS temperature to < 350°F (equivalent to ITS MODE 4). A discussion for the addition of MODE 5 is located in DOC M01.	3.7.16 ACTION A	3.4.d.3	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.1 L01	CTS 3.7.c allows a system, train, or component 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, train, or component is OPERABLE. Conversely, if the requirements of CTS 3.7.c are not met, the equipment would immediately be declared inoperable and the associated CTS actions for the inoperable equipment would be required to be taken. ITS 3.8.1 Required Action A.2 (which applies when one offsite source is inoperable) requires the declaration of required feature(s) with no offsite power available inoperable when the redundant required feature(s) are inoperable 24 hours from discovery of no offsite power to one train concurrent with inoperability of redundant required feature(s). ITS 3.8.1 Required Action B.2 (which applies when one required DG is inoperable) requires the declaration of required feature(s), supported by the inoperable DG, inoperable when the required redundant feature(s) are inoperable 4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s). ITS 3.8.1 Required Action C.1 (which applies when two offsite circuits are inoperable) requires the declaration of required feature(s) inoperable when the redundant required feature(s) are inoperable 12 hours from discovery of Condition C concurrent with inoperability of redundant required feature(s). This changes the CTS by allowing more time to restore inoperable AC sources prior to declaring the associated equipment inoperable.	3.8.1 Required Actions A.2, B.2, and C.1	3.7.c	3
3.8.1 L02	CTS 3.7.b.1, in part, allows 7 days to restore an inoperable offsite circuit to OPERABLE status provided the other offsite circuit is OPERABLE. Thus, the CTS does not allow two offsite circuits to be inoperable and does not include Actions to take if two offsite circuits are inoperable. Therefore the shutdown requirements of CTS 3.0.c would apply. ITS 3.8.1 ACTION C covers the condition of two offsite circuits inoperable and requires the restoration of one offsite circuit to OPERABLE status within 24 hours. This changes the CTS by providing some time to restore an inoperable offsite circuit prior to requiring a plant shutdown when two offsite circuits are inoperable.	3.8.1 ACTION C	3.0.c	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.1 L03	CTS 3.7.b.1, in part, allows 7 days to restore an inoperable offsite circuit to OPERABLE status provided both DGs are OPERABLE. Thus, the CTS does not allow one offsite circuit and one DG to be simultaneously inoperable. Therefore, the shutdown requirements of CTS 3.0.c would apply. ITS 3.8.1 ACTION D covers the condition of one offsite circuit and one DG inoperable and requires the restoration of either the offsite circuit or the DG to OPERABLE status within 12 hours. In addition, a Note is included that requires entry into the Conditions and Required Actions of LCO 3.8.9, "Distribution Systems - Operating," when Condition D is entered with no AC power source to any division. This changes the CTS by allowing some time to restore an AC power source prior to requiring a plant shutdown when one offsite source and one DG are inoperable.	3.8.1 ACTION D	3.0.c	4
3.8.1 L04	CTS 4.6.a.2 requires verification of DG performance following a "simulated" loss of offsite power in conjunction with a "simulated" safety injection signal. ITS SR 3.8.1.16 performs a similar test, but specifies that each signal may be from either an "actual" or "simulated" signal. This changes the CTS by explicitly allowing the use of an actual signal for the test.	SR 3.8.1.16	4.6.a.2	6
3.8.1 L05	CTS 4.6.a.2 requires, in part, that on a loss of all offsite power coincident with a safety injection signal, each DG be verified to start and assume required loads to the extent possible within 1 minute. ITS SR 3.8.1.16 requires a similar test, but specifies the permanently connected loads be verified energized in ≤ 10 seconds and that auto-connected loads are energized through the time delay relays. This changes the CTS by removing the requirement to verify all loads are energized "within 1 minute."	SR 3.8.1.16	4.6.a.2	6
3.8.1 L06	CTS Table TS 4.1-3 Equipment Test 9 requires the diesel fuel oil inventory to be verified within limits weekly (every 7 days). ITS SR 3.8.1.4 requires the verification to be performed every 31 days. This changes the CTS by extending the Surveillance interval from 7 days to 31 days.	SR 3.8.1.4	Table TS 4.1-3 Equipment Test 9	7

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.2 L01	CTS 3.7 does not contain any specific OPERABILITY requirements for the qualified offsite circuits and DGs during shutdown conditions. However, the CTS 1.0.e definition of OPERABLE requires that, for all equipment required to be OPERABLE, "all necessary attendant ... normal and emergency electrical power sources... that is required for the system or component to perform its intended function is also capable of performing their related support functions." Furthermore, CTS 3.7.c states, "When its normal or emergency power source is inoperable, a system, train or component may be considered OPERABLE ... provided its corresponding normal or emergency power source is OPERABLE and its redundant system, train, or component is OPERABLE." New requirements were added as ITS LCO 3.8.2.a and LCO 3.8.2.b. ITS LCO 3.8.2.a requires one qualified circuit between the offsite transmission network and the onsite Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.10, "Distribution Systems - Shutdown," and ITS LCO 3.8.2.b requires one DG capable of supplying one train of the onsite Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.10. ITS 3.8.2 is required in MODES 5 and 6 and during the movement of irradiated fuel assemblies. This changes the CTS by adding an explicit LCO for an offsite circuit and DG during MODES 5 and 6 and during the movement of irradiated fuel assemblies.	LCO 3.8.2 including Applicability	3.7.c	1
3.8.3 L01	CTS 3.7.a.7 does not provide explicit compensatory actions if the volume of fuel oil in a storage tank and corresponding day tanks is less than the specified limit. Thus, if the minimum required volume is not met, the associated DG must be declared inoperable and CTS 3.7.b.7 must be entered. ITS 3.8.3 ACTION A allows the unit to not declare the associated DG inoperable as long as the usable volume of stored fuel oil is greater than a six day limit (i.e., > 27,961 gallons). In this situation, ITS 3.8.3 Required Action A.1 allows 48 hours to restore the fuel oil volume to within limits. As stated in the ACTIONS Note, a separate entry into this new ACTION is allowed for each DG. If this Required Action and associated Completion Time are not met or if the fuel oil storage tank usable volume is < 27,961 gallons, the associated DG must be declared inoperable immediately (ITS 3.8.3 ACTION E). This changes the CTS by	3.8.3 ACTIONS A and E	3.7.b.7	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.3 L01 (continued)	allowing the DGs to not be declared inoperable with the fuel oil storage tank and corresponding day tanks volume not within the specified Surveillance limit as long as the associated DG has enough fuel oil for 6 days of operation at rated load.	3.8.3 ACTIONS A and E	3.7.b.7	4
3.8.3 L02	CTS Table TS 4.1-3 Equipment Test 9 requires the diesel fuel oil inventory to be verified within limits weekly (every 7 days). ITS SR 3.8.3.1 requires the verification to be performed every 31 days. This changes the CTS by extending the Surveillance interval from 7 days to 31 days.	SR 3.8.3.1	Table TS 4.1-3 Equipment Test 9	7
3.8.4 L01	CTS 3.7.b.3 allows one battery to be inoperable for 24 hours provided the other battery and two battery chargers are OPERABLE with one charger carrying the DC supply system. However, the CTS does not include explicit Actions when a DC electrical power subsystem is inoperable for reasons other than an inoperable battery (e.g., inoperable charger or inoperable battery and charger). Thus, when only one battery charger is inoperable, KPS considers the associated battery still OPERABLE until the battery voltage decreases below a minimum voltage limit. At that time, both the battery charger and associated battery are inoperable and the shutdown requirements of CTS 3.0.c would apply. ITS 3.8.4 ACTION A covers the condition of one required battery charger inoperable and requires the restoration of battery terminal voltage to greater than or equal to the minimum established float voltage within 2 hours, the verification that battery float current is ≤ 2 amps once per 12 hours, and the restoration of the inoperable battery charger to OPERABLE status within 72 hours. If one DC electrical power subsystem is inoperable for reasons other than those specified in ITS 3.8.4 ACTION A (e.g., inoperable battery and charger), ITS 3.8.4 ACTION B requires the restoration of the inoperable DC electrical power subsystem within 2 hours. This changes the CTS by providing a restoration time for an inoperable battery charger and for an inoperable battery and charger prior to requiring a plant shutdown. See DOC M02 for discussion of reducing the restoration time for an inoperable battery.	3.8.4 ACTION A	3.7.b.3, 3.0.c	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.4 L02	CTS 3.7.b provides the requirement when a DC source is inoperable. ITS 3.8.4 also provides ACTIONS, but includes a Note that allows a DC electrical power subsystem to be inoperable for up to 24 hours solely due to a room cooler being non-functional and not require the ACTIONS to be entered, provided the associated room temperature is monitored and maintained within the design environmental requirements and the other DC electrical power subsystem is OPERABLE. This changes the CTS by allowing a 24 hour deferral in entering associated ACTIONS when a DC electrical power subsystem is inoperable solely due to a room cooler being non-functional.	3.8.4 ACTIONS Note	3.7.b	3
3.8.6 L01	CTS 3.7.b.3 allows one battery to be inoperable for 24 hours before a reactor shutdown is required. This Action is applicable when the battery is inoperable due to battery parameters not within limits. In lieu of this current Action under these conditions, the ITS 3.8.6 ACTIONS provide compensatory actions when battery parameters are not within limits, to be taken prior to declaring the associated battery inoperable. This changes the CTS by replacing the current Action with new compensatory actions for battery parameters not within limits.	3.8.6 ACTIONS A, B, C, D, E, and F	3.7.b.3	4
3.8.6 L02	CTS 4.6.b.1 requires, in part, the verification that the cell voltage is within limits every month. ITS SR 3.8.6.5 requires verification of each battery connected cell voltage every 92 days. This changes the CTS by extending the Surveillance interval for verification of cell voltage from 31 days to 92 days.	SR 3.8.6.5	4.6.b.1	7
3.8.6 L03	CTS 4.6.b.1 requires measurement of each pilot cell specific gravity every month and CTS 4.6.b.3 requires measurement of specific gravity for each cell every quarter. ITS 3.8.6 does not include these specific gravity Surveillances. This changes the CTS by deleting these specific gravity Surveillances.	None	4.6.b.1, 4.6.b.3	5
3.8.6 L04	CTS 4.6.b.2 requires verification of the temperature of every fifth cell every quarter. ITS 3.8.6 does not include this Surveillance. This changes the CTS by deleting this Surveillance.	None	4.6.b.2	5
3.8.6 L05	CTS 4.6.b.4 requires the performance of a "load test" of the batteries. ITS SR 3.8.6.6 requires the performance of a "performance discharge" test or a "modified performance discharge" test. This changes the CTS by adding the allowance to perform a modified performance discharge test instead of the performance discharge test (equivalent to the load test).	SR 3.8.6.6	4.6.b.4	6

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.6 L06	CTS 4.6.b.4 requires the performance of a load test. During this test, the CTS also requires that the battery voltage be monitored as a function of time to establish that the battery performs as expected during heavy discharge and that all electrical connections are tight. ITS SR 3.8.6.6 requires a similar battery test; however, the battery voltage monitoring as a function of time and monitoring that the connections are tight during the test is not included. This changes the CTS by deleting the measurement requirements that are required to be taken during performance of the test.	None	4.6.b.4	5
3.8.6 L07	CTS 4.6.b.1, in part, requires an equalizing charge to be performed if the lowest cell in the battery falls < 2.13 volts. CTS 4.6.b.3 requires that all measurements be recorded and compared with previous data to detect signs of deterioration. The ITS does not include these specific requirements. This changes the CTS by deleting the equalizing charge requirement and the comparison of parameters from past tests requirement.	None	4.6.b.1, 4.6.b.3	5
3.8.9 L01	CTS 3.7.a.6 requires, in part, that both DC systems be OPERABLE, however, the CTS does not include Actions to take when a DC electrical power distribution subsystem is inoperable. Therefore, the shutdown requirements of CTS 3.0.c would apply. ITS 3.8.9 ACTION C covers the condition for one or more DC electrical power distribution subsystems inoperable and requires the restoration of the DC electrical power distribution subsystem within 2 hours. Furthermore, if multiple DC electrical power distribution subsystems were inoperable such that a loss of safety function resulted, ITS 3.8.9 ACTION E requires immediate entry into LCO 3.0.3 (which requires a unit shutdown). Under these conditions, the 2 hour restoration time provided by ITS 3.8.9 ACTION C would not be allowed. This changes the CTS by providing some time to restore an inoperable DC electrical power distribution subsystem prior to requiring a plant shutdown provided a loss of function has not occurred.	3.8.9 ACTIONS C and E	3.0.c	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.9 L02	CTS 3.7.b provides the requirement when an AC or DC electrical power distribution subsystem is inoperable. ITS 3.8.9 also provides ACTIONS, but includes a Note that allows one or more electrical power distribution subsystems to be inoperable for up to 24 hours solely due to a room cooler being non-functional and not require the ACTIONS to be entered, provided the associated room temperature is monitored and maintained within the design environmental requirements and the electrical power distribution subsystems in the other train are OPERABLE. This changes the CTS by allowing a 24 hour deferral in entering associated ACTIONS when an electrical power distribution subsystem is inoperable solely due to a room cooler being non-functional.	3.8.9 ACTIONS Note	3.7.b	3
3.9.1 L01	CTS 3.8.a.5 requires the boron concentration be verified by chemical analysis daily. CTS Table TS 4.1-2 Sample Test 2 requires a test of the boron concentration twice per week. ITS SR 3.9.1.1 requires verification that the boron concentration is within the limit specified in the COLR every 72 hours. This changes the CTS by changing the Surveillance Frequency from daily and twice per week (with no specific time between performances specified) to 72 hours.	SR 3.9.1.1	3.8.a.5, Table TS 4.1-2 Sampling Test 2 Frequency	7
3.9.4 L01	ITS 3.9.4 LCO Note 2 allows one RHR loop to be inoperable for a period of up to 2 hours for Surveillance testing, provided that the other RHR loop is OPERABLE and in operation. The CTS does not contain this allowance; CTS 3.1.a.2.B requires both RHR trains to be OPERABLE at all times when in MODE 6 with the water level < 23 ft above the top of the reactor vessel flange. This changes the CTS by providing an allowance for one of the RHR loops to be inoperable for a limited period of time to perform required Surveillance testing.	LCO 3.9.4 Note 2	3.1.a.2.B	1
3.9.5 L01	CTS 3.8.a.10 is applicable during REFUELING OPERATIONS. ITS 3.9.5 is applicable during movement of irradiated fuel assemblies within containment. This changes the CTS by requiring the minimum water level above the reactor vessel flange to be maintained at ≥ 23 feet only during times when irradiated fuel assemblies are being moved within containment, in lieu of during REFUELING OPERATIONS.	3.9.5 Applicability	3.8.a.10	2

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 3.8.a.10 requires the minimum water level above the vessel flange to be maintained at 23 feet during REFUELING OPERATIONS (which is defined as movement of reactor vessel internal components that could affect the reactivity of the core within the containment when the reactor head is unbolted or removed). If this requirement is not met, CTS 3.8.b requires refueling of the reactor to cease. In addition, CTS 3.8.b, requires work to be initiated to correct the violated conditions so the specified limits are met and no operations which may increase the reactivity of the core shall be performed. ITS 3.9.5 ACTION A only requires immediate suspension of movement of irradiated fuel assemblies within containment. This changes the CTS by eliminating the requirement for work to be initiated to correct the violated conditions so the specified limits are met and the requirement that no operations which may increase the reactivity of the core be performed.	3.9.5 ACTION A	3.8.b	4
3.9.6 L01	CTS 3.8.a.1.a, in part, requires at least one door in each personnel air lock to be closed when the reactor vessel head or upper internals are being lifted. ITS 3.9.6 does not include this requirement. This changes the CTS by not requiring one door in each personnel air lock to be closed when the reactor vessel head or upper internals are being lifted.	None	3.8.a.1	1
3.9.6 L02	CTS 3.8.a.1.b, in part, states that each line that penetrates containment and which provides a direct air path from containment atmosphere to the outside atmosphere shall have a closed isolation valve. ITS LCO 3.9.6.c.1 states that each penetration providing direct access from the containment atmosphere to the outside atmosphere is closed by a manual or automatic isolation valve, blind flange, or equivalent. This changes the CTS by specifying the use of a blind flange or an equivalent means of isolating a containment penetration.	LCO 3.9.6.c.1	3.8.a.1.b	1
3.9.6 L03	CTS 3.8.a.8 requires verification of the automatic actuation of the Containment Ventilation and Purge valves on a containment ventilation isolation signal. ITS SR 3.9.6.2 specifies that the signal may be from either an actual or simulated signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal to perform the Surveillance.	SR 3.9.6.2	3.8.a.8	6

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.6 L04	CTS 3.8.a.8 includes a Surveillance Frequency of "immediately prior to and daily during REFUELING OPERATIONS" for performing a Surveillance of the Containment Ventilation and Purge System. The ITS SR 3.9.6.2 Frequency for the same requirement is 18 months. ITS SR 3.9.6.2 is also modified by a Note that states that SR 3.9.6.2 is not required to be met for containment purge and vent valve(s) in penetrations that are closed to comply with LCO 3.9.6.c.1. This changes the CTS by changing the Surveillance Frequency from immediately prior to and daily during REFUELING OPERATIONS to 18 months and adding the Note that the SR is not required to be met for containment purge and vent valve(s) in penetrations that are closed to comply with ITS LCO 3.9.6.c.1.	SR 3.9.6.2, including Note	3.8.a.8	7
3.9.6 L05	CTS 3.8.a specifies that the CTS 3.8.a.1 containment closure requirements are applicable during REFUELING OPERATIONS, which is defined in CTS Section 1.0 as the movement of reactor vessel internals that could affect the reactivity of the core within the containment when the vessel head is unbolted or removed. ITS 3.9.6 is applicable during movement of irradiated fuel assemblies within containment. This changes the CTS by not requiring the containment closure requirements to be met when moving or handling control rods during MODE 6 operation.	3.9.6 Applicability	3.8.a	2
4.0 L01	CTS Table TS 4.1-3 Equipment Test 11 requires a visual inspection test of the fuel assemblies each REFUELING outage. In addition, footnote (1) to Table TS 4.1-3 requires that following maintenance on equipment that could affect the operation of the equipment, tests should be performed to verify OPERABILITY. ITS 4.0 does not contain these requirements. This changes the CTS by eliminating a Surveillance Requirement and a subsequent post-maintenance Surveillance Requirement.	None	Table TS 4.1-3 Equipment Test 11, including footnote (1)	5
5.2 L01	CTS 6.2.b.1.B requires two licensed reactor operators to be on duty at all times as part of the shift complement. This requirement is being deleted from the Technical Specification since it is duplicative of 10 CFR 50.54(m)(2)(i). This is discussed in DOC A02. However, 10 CFR 50.54(m)(2)(i) only requires one licensed Operator to be on duty when in MODE 5 or 6 or defueled. This changes the CTS by only requiring one licensed Operator to be on duty when in MODE 5 or 6 or defueled.	None	6.2.b.1.B	1

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.2 L02	CTS 6.2.b.1.E requires one radiation technologist to be on duty at all times as part of the shift complement. ITS 5.2.2.c only requires one radiation technologist to be on duty when there is fuel in the reactor vessel. This changes the CTS by not requiring a radiation technologist to be on duty when the reactor is defueled.	5.2.2.c	6.2.b.1.E	1
5.2 L03	CTS 6.2.b.7 states that "When the reactor is above the COLD SHUTDOWN condition, a qualified shift technical advisor shall be within 10 minutes of the control room." ITS 5.2.2.e requires the shift technical advisor to be on duty when the unit is in MODE 1, 2, 3, or 4, but does not require the individual to be within 10 minutes of the control room. This changes the CTS by deleting the requirement that the shift technical advisor be within 10 minutes of the control room.	5.2.2.e	6.2.b.7	1
5.5 L01	CTS 6.20.b states, in part, that the leakage rate acceptance criteria prior to unit startup for the Type A test is $< 0.75\ L_a$. ITS 5.5.14.d.1 states, in part, that the leakage rate acceptance criteria prior to unit startup for the Type A test is $\leq 0.75\ L_a$. This changes the CTS by allowing the leakage rate to be exactly equal to $0.75\ L_a$ in lieu of being $< 0.75\ L_a$.	5.5.14.d.1	6.20.b	1
5.5 L02	CTS 4.4.c.1.a provides the pressure drop test acceptance criteria for the Shield Building Ventilation System (SBVS) and the Auxiliary Building Special Ventilation (ASV) System. The acceptance criteria are a pressure drop across the combined HEPA filters and charcoal adsorber banks < 10 inches of water and a pressure drop across any HEPA filter bank < 4 inches of water. CTS 4.17.a.1 provides the pressure drop test acceptance criteria for the Control Room Post Accident Recirculation (CRPAR) System. The acceptance criteria are a pressure drop across the combined HEPA filters and charcoal adsorber banks < 6 inches of water and a pressure drop across any HEPA filter bank < 4 inches of water. ITS 5.5.9.d provides the pressure drop test acceptance criteria for all three systems, and requires the pressure drop across the combined prefilters, HEPA filters, and charcoal adsorber banks to be < 6.3 inches of water for the SBVS and the ASV System, and < 2.4 inches of water for the CRPAR System. This changes the CTS by reducing the acceptance criteria for the combined dP, including the prefilters as part of the combined dp test, and deleting the HEPA filter only dP criteria.	5.5.9.d	4.4.c.1.a, 4.17.a.1	1

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.b.1.A requires the Annual Radiological Environmental Operating Report to be submitted before May 1 of the 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.b.1.A	1
5.7 L01	CTS 6.13.a states, for high radiation areas, "…entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP)." CTS 6.13.b also references use of an RWP when personnel access certain high radiation areas. ITS 5.7.1.b and ITS 5.7.2.b state, for high radiation areas, "Access to, and activities in, each such area shall be controlled by means of Radiation Work Permit (RWP) *or equivalent* (emphasis added) that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures." This changes the CTS by allowing an equivalent document to be used for access control. The addition of details required in the RWP is addressed by DOC M01.	5.7.1.b, 5.7.2.b	6.13.a, 6.13.b	1
5.7 L02	CTS 6.13.a.2 states that entry a high radiation area when using a radiation monitoring device that continuously integrates the dose and alarms at a preset dose can be made only after the dose rate in the area has been established and personnel have been made knowledgeable of them. ITS 5.7.1.e and 5.7.2.e allows entry without this specific requirement provided the individuals are qualified in radiation protection procedures or the individuals are continuously escorted by an individual qualified in radiation protection procedures. This changes the CTS by allowing individuals qualified in radiation protection procedures or by individuals that are continuously escorted by an individual qualified in radiation protection procedures to enter a high radiation area using a radiation monitoring device that continuously integrates the dose and alarms at a preset dose prior to knowing the dose rate in the area.	5.7.1.e, 5.7.2.e	6.13.a.2	1

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.7 L03	ITS 5.7.1.d.3 and 5.7.2.d.2 state that one of the options for devices an individual or group shall possess for radiation monitoring when entering a high radiation area is "A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area." ITS 5.7.2.d.2 also requires a means to communicate with and control every individual in the area. CTS 6.13.a and 6.13.b do not contain these options for an individual or group. This changes the CTS by providing an additional device an individual entering these high radiation areas must possess for radiation monitoring.	5.7.1.d.3, 5.7.2.d.2	None	1

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.7 L04	CTS 6.13.a.3 states that one of the optional criteria that allow entry into a high radiation area is "An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Health Physicist in the Radiation Work Permit." CTS 6.13.b allows that in lieu of the stay time requirements of the RWP, direct or remote continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities within the area. ITS 5.7.1.d.4 states "A self reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and, (i) 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, or (ii) be under the surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with individuals in the area who are covered by such surveillance." ITS 5.7.2.d.3 reads the same as ITS 5.7.1.d.4, except the last phrase, "communicate with individuals in the area who are covered by such surveillance," is replaced with the phrase, "communicate with and control every individual in the area." This changes the CTS by deleting the discussion of positive controls over activities and performing radiation surveillances with a requirement for the monitoring device to have continuous dose rate displays and the responsibility to control dose rates in the area and adds an option to perform the monitoring of personnel remotely using the specified equipment and processes for a high radiation area < 1000 mrem/hr. It further changes the CTS by specifying the individual has a self-reading pocket dosimeter when using this option.	5.7.1.d.4, 5.7.2.d.3	6.13.a.3, 6.13.b	1

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.7 L05	ITS 5.7.2.d.4 permits the use of a radiation monitoring device that continuously displays radiation dose rates in the area when ITS 5.7.2.d.2 and ITS 5.7.2.d.3 are impractical or determined to be inconsistent with the "As Low As is Reasonably Achievable" principle. CTS 6.13.a and 6.13.b do not contain this option. This changes the CTS by providing an additional option for devices an individual entering these high radiation areas must use to control radiation dose.	5.7.2.d.4	None	1
CTS 6.0 L01	CTS 6.9.a.1 contains requirements for submitting a report of plant startup and power escalation testing following receipt of an operating license; amendments to the license involving planned increases in power level; installation of fuel that has a different fuel supplier; and modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the unit. The ITS does not contain such reporting requirements. This changes the CTS by deleting the requirements for CTS 6.9.a.1.	None	6.9.a.1	8
CTS 6.0 L02	CTS 6.9.a.2 requires annual reporting of information regarding any instances when the I-131 specific activity limit for the primary coolant 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 I-131 specific activity limit for the primary coolant is exceeded.	None	6.9.a.2	8

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
Category 8 – Deletion of Reporting Requirements
Category 9 – Allowed Outage Time, Surveillance Frequency, and Bypass Time Extensions Based on Generic Topical Reports

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
1.0 LA01	1.0.j	CTS 1.0.j, "MODES," states that REFUELING is restricted to Reactivity $\Delta k/k$ of < -5%. ITS Table 1.1-1, "MODES" does not contain this restriction.	ITS Bases	Technical Specifications Bases Control Program	1
2.0 LA01	2.1.a	CTS 2.1.a states, in part, that the SAFETY LIMIT is exceeded if the point defined by the combination of Reactor Coolant System average temperature and power level is at any time above the appropriate pressure line. This statement is in reference to the Reactor Core Safety Limits Curve (Figure 1) in the Core Operating Limits Report (COLR). ITS 2.1.1 does not contain this statement but does state, in part, that the combination of THERMAL POWER, RCS highest loop average temperature, and pressurizer pressure shall not exceed the limits in the COLR. This changes the CTS by moving the details of when the SAFETY LIMIT is exceeded from the Technical Specifications to the COLR.	COLR	Technical Specification to COLR	3
3.0	None	None	None	None	None
3.1.1 LA01	Sampling Test 2	CTS Table 4.1-2 Sampling Test 2 requires sampling tests of RCS boron concentration. ITS 3.1.1 does not have a specific requirement to test RCS boron concentration. This changes the CTS by removing the details of the RCS boron concentration test to the Bases.	ITS Bases	Technical Specifications Bases Control Program	3

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.1.3 LA01	3.10.f.4	CTS 3.10.f.4.A requires, in part, the development and maintenance of administrative control rod withdrawal limits sufficient to restore the moderator temperature coefficient to within the limits specified in the COLR. Additionally, CTS 3.10.f.4.A states that the withdrawal limits shall be in addition to the insertion limits specified in rod insertion limits. ITS 3.1.3 Required Action A.1 requires the establishment of withdrawal limits for control banks to maintain MTC within limits. This changes the CTS by moving the statement that these withdrawal limits shall be in addition to the insertion limits specified in rod insertion limits to the Bases.	ITS Bases	Technical Specifications Bases Control Program	3
3.1.4 LA01	3.10.e	CTS 3.10.e states, in part, that the magnitude of an indicated rod misalignment may be determined by comparison of the respective bank demand counter to the analog individual rod position indicator, the rod position on the plant process computer, or through the conditioning module output voltage via a correlation of rod position vs. voltage. ITS 3.1.4 does not contain this statement. This changes the CTS by moving the description of how to determine the magnitude of the rod misalignment to the Bases.	ITS Bases	Technical Specifications Bases Control Program	1
3.1.4 LA02	3.10.g.1	CTS 3.10.g.1 states, in part, that an inoperable rod is a rod which does not trip or which is declared inoperable. ITS 3.1.4 does not contain this statement. This changes the CTS by moving the detail describing an inoperable rod to the Bases.	ITS Bases	Technical Specifications Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.2.1 LA01	3.10.b.4	CTS 3.10.b.4 requires the $F_Q^N(Z)$ equilibrium relationship to be determined to be within its limit by using the movable incore detectors to obtain a power distribution map. ITS SR 3.2.1.1 just requires verification that $F_Q^C(Z)$ (i.e., the equilibrium relationship) is within its limit. CTS 3.10.b.6 requires the $F_Q^N(Z)$ transient relationship to be determined to be within its limit by using the movable incore detectors to obtain a power distribution map. ITS SR 3.2.1.2 just requires verification that $F_Q^T(Z)$ (i.e., the transient relationship) is within its limit. This changes the CTS by relocating to the ITS Bases the manner in which the $F_Q^N(Z)$ equilibrium and transient relationship determination is performed.	ITS Bases	Technical Specifications Bases Control Program	3
3.2.2 LA01	3.10.b.2.C	CTS 3.10.b.2.C requires $F_{\Delta H}^N$ to be determined to be within its limit through incore mapping and CTS 3.10.b.4 requires $F_{\Delta H}^N$ to be determined to be within its limit by using the movable incore detectors to obtain a power distribution map. ITS SR 3.2.2.1 just requires verification that $F_{\Delta H}^N$ is within its limit. This changes the CTS by relocating to the ITS Bases the manner in which the $F_{\Delta H}^N$ determination is performed.	ITS Bases	Technical Specifications Bases Control Program	3
3.3.1 LA01	Table TS 3.5-2	CTS Table TS 3.5-2 has four columns stating various requirements for each Functional Unit. These columns are titled "NO. OF CHANNELS," "NO. OF CHANNELS TO TRIP," "MINIMUM OPERABLE CHANNELS," and	Bases	Technical Specification Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.1 LA01 (continued)	Table TS 3.5-2	"MINIMUM DEGREE OF REDUNDANCY." ITS Table 3.3.1-1 does not contain the "NO. OF CHANNELS," "NO. OF CHANNELS TO TRIP" and "MINIMUM DEGREE OF REDUNDANCY" columns. This changes the CTS by moving the information provided in the "NO. OF CHANNELS," "NO. OF CHANNELS TO TRIP," and "MINIMUM DEGREE OF REDUNDANCY" columns to the Bases. Note that Discussion of Changes M01 describes the changes to the number of channels required by the LCO and Discussion of Change A03 describes the change in the title of the "MINIMUM OPERABLE CHANNELS" column.	Bases	Technical Specification Bases Control Program	1
3.3.1 LA02	2.3.a.2, 2.3.a.3.A, 2.3.a.3.B, 2.3.a.4, 2.3.a.5, 2.3.a.6, 2.3.a.7 Table 3.5-2	CTS Table TS 3.5-2 Notes contains Setting Limits for Permissive/Interlocks P-6, P-7, P-8, and P-10. CTS 2.3.a.1 specifies the reactor trip settings for Nuclear Flux instrumentation. CTS 2.3.a.2 specifies the reactor trip settings for the pressurizer. CTS 2.3.a.3.A specifies Reactor Coolant Temperature – Overtemperature settings. CTS 2.3.a.3.B specifies Reactor Coolant Temperature Overpower settings. CTS 2.3.a.4 specifies the Reactor Coolant Flow settings. CTS 2.3.a.5 specifies the Steam Generator settings. CTS 2.3.a.6 specifies the Reactor Trip Interlock settings. CTS 2.3.a.7 specifies other Trips which include Undervoltage trip, turbine trip, manual trip, and safety injection trip. ITS 3.3.1 does not contain Setting Limits for the RPS instrumentation. This changes the CTS by moving the Setting Limits and the reactor trip settings for Nuclear Flux instrumentation, pressurizer, Reactor Coolant Temperature, Steam Generator, Undervoltage trip, and safety injection trip to the Setpoint Control Program. Note that there are no Setting Limits for the Turbine Trip or the Manual Trip, thus no settings are being moved; only the line item is being moved.	Setpoint Control Program	10 CFR 50.59	4

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.1 LA03	Table TS 4.1-1 Channel Description 1	Note (a) to CTS Table TS 4.1-1 Channel Description 1 (Nuclear Power Range) in the Remarks Section states that the weekly Channel Check contains a heat balance. Note (b) to CTS Table TS 4.1-1 Channel Description 1 in the Remarks Section states that the monthly CHANNEL FUNCTIONAL TEST contains the signal to ΔT and bistable action (permissive, rod stop, and trips). Note (c) to CTS Table TS 4.1-1 Channel Description 1 in the Remarks Section states that the Effective Full Power quarterly CHANNEL CALIBRATION contains upper and lower chambers for axial off-set using incore detectors. ITS 3.3.1 does not contain these requirements. This changes the CTS by moving these details to the Bases.	Bases	Technical Specification Bases Control Program	1
3.3.1 LA04	Table TS 4.1-1 Channel Description 2	Note (b) to CTS Table TS 4.1-1 Channel Description 2 (Nuclear Intermediate Range) in the Remarks Section states that the CHANNEL FUNCTIONAL TEST contains the bistable action (permissive, rod stop, and trips). ITS 3.3.1 does not contain these requirements. This changes the CTS by moving these details to the Bases.	Bases	Technical Specification Bases Control Program	1
3.3.1 LA05	Table TS 4.1-1 Channel Description 3	Note (b) to CTS Table TS 4.1-1 Channel Description 3 (Nuclear Source Range) in the Remarks Section states that the CHANNEL FUNCTIONAL TEST contains the bistable action (alarms and trips). ITS 3.3.1 does not contain these requirements. This changes the CTS by moving these details to the Bases.	Bases	Technical Specification Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.1 LA06	Table 4.1-3 Equipment Test 1.c	CTS Table TS 4.1-3 Equipment Test 1.c requires testing the Reactor Trip Breaker by opening of the reactor trip and bypass breakers. This test is modified by a footnote (3) which requires the use of the Control Room push-button to independently test the reactor trip and undervoltage trip attachments. It also requires verification of the undervoltage trip attachment on the reactor trip bypass breakers. ITS SR 3.3.1.14 does not contain the requirements in the footnote. This changes the CTS by moving these details to the Bases.	Bases	Technical Specification Bases Control Program	3
3.3.2 LA01	3.5.a Table TS 3.5-1	CTS 3.5.a states that Setting Limits for instrumentation which initiate operation of the engineered safety features shall be as stated in Table TS 3.5-1. CTS Table TS 3.5-1 contains Setting Limits for Engineered Safety Features initiation instruments. ITS 3.3.2 does not contain Setting Limits for ESFAS initiation instruments. This changes the CTS by moving the Setting Limits for the ESFAS instrumentation to the Setpoint Control Program.	Setpoint Control Program	10 CFR 50.59	4
3.3.2 LA02	Table TS 3.5-1 Functional Unit 1, Functional Unit 3, Functional Unit 4	CTS Table TS 3.5-1 Functional Unit 1 (High Containment Pressure (Hi)), Functional Unit 3 (Pressurizer Low Pressure), and Functional Unit 4 (Low Steam Line Pressure) reference footnote (1) which states that Safety Injection "initiates containment isolation, feedwater line isolation, shield building ventilation, auxiliary building special vent, and starting of all containment fans." CTS Table TS 3.5-3 Functional Unit 4.b (Motor-Driven Auxiliary Feedwater Pumps, Loss of Main Feedwater) references footnote (4), which states "Tripping of both main feedwater pump breakers starts both motor-driven auxiliary feedwater pumps." ITS 3.3.2 does not contain these footnotes. This changes the CTS by moving these details to the Bases.	Bases	Technical Specification Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.2 LA03	Table TS 3.5-1 Functional Unit 5, Functional Unit 6	CTS Table TS 3.5-1 Functional Unit 5 (High Steam Flow in a Steam Line Coincident with Safety Injection and "Lo-Lo" T_{avg}) and Functional Unit 6 (High-High Steam Flow in a Steam Line Coincident with Safety Injection) reference footnote (2) which requires confirmation of main steam line isolation valve closure within 5 seconds when tested. ITS 3.3.2 does not contain this footnote. This changes the CTS by moving this procedural detail to the TRM.	TRM	10 CFR 50.59	3
3.3.2 LA04	Table TS 3.5-2, Table TS 3.5-3, Table TS 3.5-4	CTS Tables TS 3.5-2, TS 3.5-3, and TS 3.5-4 have four columns stating various requirements for each Functional Unit. These columns are titled "NO. OF CHANNELS," "NO. OF CHANNELS TO TRIP," "MINIMUM OPERABLE CHANNELS," and "MINIMUM DEGREE OF REDUNDANCY." ITS Table 3.3.2-1 does not contain the "NO. OF CHANNELS," "NO. OF CHANNELS TO TRIP," and "MINIMUM DEGREE OF REDUNDANCY" columns. This changes the CTS by moving the information provided in the "NO. OF CHANNELS," "NO. OF CHANNELS TO TRIP," and "MINIMUM DEGREE OF REDUNDANCY" columns to the Bases. Note that Discussion of Changes M01 thru M04 describes the changes to the number of channels required by the LCO and Discussion of Change A03 describes the change in the title of the "MINIMUM OPERABLE CHANNELS" column.	Bases	Technical Specification Bases Control Program	1
3.3.2 LA05	Table TS 4.1-1 Channel Description 18.a	Note (a) to Channel Description 18.a (Containment Pressure (SIS signal)) of CTS Table TS 4.1-1 in the Remarks Section states the monthly TEST Surveillance Requirement is applicable only to the Isolation Valve Signal. ITS 3.3.2 requires a similar Surveillance (ITS SR 3.3.2.4) to be performed, but the Surveillance does not contain the information contained in the Note. This changes the CTS by moving the details of the scope of the Surveillance from the CTS to the Bases.	Bases	Technical Specification Bases Control Program	3

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.2 LA06	Table TS 4.1-1 Channel Description 14	CTS Table TS 4.1-1 Channel Description 14 provides Surveillance Requirements for Residual Heat Removal Pump Flow instrumentation. The ITS does not include requirements for this flow instrumentation. The Technical Specification function of this instrumentation is only to provide indication. This changes the CTS by relocating the requirements for this flow instrumentation to the TRM.	TRM	10 CFR 50.59	4
3.3.2 LA07	Table TS 4.1-1 Channel Description 19	CTS Table TS 4.1-1 Channel Description 19, Radiation Monitoring System, provides Surveillance Requirements for the instrumentation channels. Included in the REMARKS column of Channel Description 19 is footnote (a) that states, in part, that channels R15 and R19 are included. Specifically, channels R15 and R19 are required to have a performance of a CHANNEL CHECK daily, a CHANNEL CALIBRATION each refueling cycle, and a CHANNEL TEST quarterly. The ITS does not include these requirements for these radiation monitor instrumentation channels. This changes the CTS by moving these requirements to the Offsite Dose Calculation Manual (ODCM).	ODCM	10 CFR 50.59	4
3.3.3 LA01	Table TS 3.5-6 Functional Unit 10	Footnote (6) to Functional Unit 10, Core Exit Thermocouples, of CTS Table TS 3.5-6 states for the purposes of accident monitoring instrumentation, thermocouples on the axis may be included in either adjacent quadrant. ITS 3.3.3 does not contain this information. This changes the CTS by removing the details of the system design to the Bases.	Bases	Technical Specification Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.5 LA01	Table 3.5-1 Functional Unit 10	CTS Table TS 3.5-1 Footnote (4) to Functional Unit 9, Safeguards Bus Undervoltage, states this undervoltage protection channel ensures ESF equipment will perform as assumed in the USAR. CTS Table TS 3.5-1 Footnote (5) to Functional Unit 10, Safeguards Bus Second Level Undervoltage, states this undervoltage protection channel protects ESF equipment from long-term low voltage operation. ITS 3.3.5 does not contain this information. This changes the CTS by removing the details of the system design to the Bases.	Bases	Technical Specification Bases Control Program	1
3.3.5 LA02	3.5.a Table TS 3.5-1 Functional Unit 9 Functional Unit 10	CTS 3.5.a states setting limits for instrumentation which initiate operation of the engineered safety features shall be as stated in Table TS 3.5-1. CTS Table TS 3.5-1 Functional Unit 9, Safeguards Bus Undervoltage, specifies a setting limit of 85.0% ± 2% nominal bus voltage and ≤ 2.5 seconds time delay for the associated channels. CTS Table TS 3.5-1 Functional Unit 10, Safeguards Bus Second Level Undervoltage, specifies a setting limit of 93.6% ± 0.9% of nominal bus voltage and ≤ 7.4 seconds time delay for the associated channels. ITS 3.3.5 does not contain this information. This changes the CTS by removing the setting limit information for the Safeguards Bus Undervoltage (loss of voltage) and Safeguards Bus Second Level Undervoltage (degraded voltage) channels and placing it in the KPS Setpoint Control Program (SCP) document.	Setpoint Control Program	10 CFR 50.59	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.5 LA03	Table TS 3.5-5 Functional Unit 1, Functional Unit 2	CTS Table TS 3.5-5 for Safeguards Bus Power Supply Functions has four columns stating various requirements for the Safeguards Bus Undervoltage Function and the Safeguards Bus Second Level Undervoltage Function. These columns are labeled "NO. OF CHANNELS" and "NO. OF CHANNELS TO TRIP." ITS 3.3.5 does not contain these columns. This changes the CTS by moving the information provided in these columns to the Bases. Note that Discussion of Change M01 addresses the changes to the number of channels required by the LCO.	Setpoint Control Program	10 CFR 50.59	1
3.3.5 LA04	Table 3.5-5 Functional Unit 1, Functional Unit 2	CTS Table TS 3.5-5 Footnote (1) to Functional Unit 1, Safeguards Bus Undervoltage, states that each channel consists of one instantaneous and one time-delayed relay in series. CTS Table TS 3.5-5 Footnote (3) to Functional Unit 2, Safeguards Bus Second Level Undervoltage, states that each channel consists of two time-delayed relays connected in series. ITS 3.3.5 does not contain this information. This changes the CTS by removing the details of the system design to the Bases.	Bases	Technical Specification Bases Control Program	1
3.3.6 LA01	Table TS 4.1-1 Channel Description 19	CTS Table TS 4.1-1 Channel Description 19, Remarks Section Note (a) states that the CHECK, CALIBRATE, and TEST Frequencies for the Radiation Monitoring System are applicable only to channels R11 thru R15, R19, R21, and R23. For the Containment Purge and Vent Isolation Instrumentation Specification, only instruments R11, R12, and R21 apply. ITS 3.3.6 does not contain this note. This changes the CTS by removing the description of the applicable channels to the Bases.	Bases	Technical Specification Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.6 LA02	3.5.a Table TS 3.5-1 Functional Unit 8	CTS 3.5.a states setting limits for instrumentation which initiate operation of the engineered safety features shall be as stated in Table TS 3.5-1. CTS Table TS 3.5-1 No. 8 states a setting limit of "≤ value of radiation levels in exhaust duct as defined in Footnote (3)" for the Containment Purge and Vent System Radiation Particulate Detector and Radioactive Gas Detector Functional Unit channel. Footnote 3 states the setting limits for maximum radiation levels are derived from ODCM Specification 3.4.1 and Table 2.2, and USAR Section 6.5. ITS 3.3.6 does not contain this setting limit information. This changes the CTS by removing the setting limit information of the Containment Purge and Vent System Radiation Particulate Detector and Radioactive Gas Detector functional unit and placing it in the KPS Setpoint Control Program document.	Setpoint Control Program	10 CFR 50.59	1
3.3.6 LA03	Table TS 3.5-4 Functional Unit 3	CTS Table TS 3.5-4 Functional Unit 3 for Containment Ventilation Isolation has five columns stating various requirements for the Containment Ventilation Isolation Functions. These columns are labeled "NO. OF CHANNELS" and "NO. OF CHANNELS TO TRIP." ITS 3.3.6 does not retain these columns. This changes the CTS by removing the information of these columns to the Bases.	Bases	Technical Specification Bases Control Program	1
3.3.7 LA01	Table TS 4.1-1 Channel Description 19	Note (a) to Item 19 of CTS Table TS 4.1-1 in the Remarks Section states that the instrument CHECK, CALIBRATE, and TEST Frequencies for the Radiation Monitoring System are applicable only to channels R11 through R15, R19, R21, and R23. For the CRPAR Actuation Instrumentation Specification, only instrument R23 applies. ITS 3.3.7 does not contain this note. This changes the CTS by removing the description of the applicable channels to the Bases.	Bases	Technical Specification Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.4.1 LA01	3.10.m.2	CTS 3.10.m.2 states, in part, that compliance with the reactor coolant flow rate requirement shall be demonstrated by verifying the reactor coolant flow during initial power escalation following each REFUELING. ITS SR 3.4.1.4 requires verification by precision heat balance that RCS total flow rate is ≥ 178,000 gpm and greater than or equal to the limit specified in the COLR every 18 months. This SR is modified by a Note which states that the SR is not required to be performed until 24 hours after ≥ 90% RTP. This changes the CTS by removing the procedural detail of "during initial power escalation" to the Bases.	ITS Bases	Technical Specifications Bases Control Program	3
3.4.3 LA01	3.1.b.1	CTS 3.1.b.1 states, in part, that reactor coolant temperature and pressure and system heatup and cooldown rates (with the exception of the pressurizer) shall be limited in accordance with Figures TS 3.1-1 and TS 3.1-2. ITS 3.4.3 states that RCS pressure, RCS temperature, and RCS heatup and cooldown rates shall be maintained with limits. This changes the CTS by moving the exclusion of the pressurizer from the LCO limit to the Bases.	ITS Bases	Technical Specifications Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.4.3 LA02	3.1.b.1.A, 3.1.b.1.B	CTS 3.1.b.1.A states that allowable combinations of pressure and temperature for specific temperature change rates are below and to the right of the limit lines shown. Limit lines for cooldown rates between those presented may be obtained by interpolation. Furthermore, CTS 3.1.b.1.B states that Figures TS 3.1-1 and TS 3.1-2 define limits to assure prevention of non-ductile failure only. For normal operation other inherent plant characteristics, e.g., pump heat addition and pressurizer heater capacity may limit the heatup and cooldown rates that can be achieved over certain pressure-temperature ranges. ITS 3.4.3 does not contain these statements. This changes the CTS by moving this information to the Bases.	ITS Bases	Technical Specifications Bases Control Program	1
3.4.3 LA03	Figure TS 3.1-1, Figure TS 3.1-2	CTS Figures TS 3.1-1 and TS 3.1-2 describe in text boxes the Margins for Instrumentation Error and Pressure Drop that are used to determine the P/T limits. The ITS Figures 3.4.3-1 and 3.4.3-2 do not include this information. This changes the CTS by moving this information to the Bases.	ITS Bases	Technical Specifications Bases Control Program	1
3.4.6 LA01	3.1.a.2.a	CTS 3.1.a.2.A contains a listing of four heat sinks that are utilized for decay heat removal. The heat sinks are Steam Generator 1A, Steam Generator 1B, Residual Heat Removal Train A, and Residual Heat Removal Train B. ITS LCO 3.4.6, in part, requires two loops consisting of any combination of RCS loops and residual heat removal (RHR) loops to be OPERABLE. The ITS does not define the components that comprise an OPERABLE loop. This changes the CTS by moving the description of the RCS and RHR loops to the Bases.	ITS Bases	Technical Specifications Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.4.7 LA01	3.1.a.2.B	CTS 3.1.a.2.B requires two residual heat removal (RHR) trains be OPERABLE with each train consisting of the following: 1) one OPERABLE residual heat removal pump; 2) one OPERABLE residual heat removal heat exchanger; and, 3) an OPERABLE flow path consisting of all valves and piping associated with the above train of components and required to remove decay heat from the core during normal shutdown situations. This flow path shall be capable of taking suction from the appropriate Reactor Coolant System hot leg and returning to the Reactor Coolant System. ITS LCO 3.4.7 requires two RHR loops to be OPERABLE, but does not define the components and the associated flow path that comprise an OPERABLE RHR train. This changes the CTS by moving the description of the RHR trains to the Bases.	ITS Bases	Technical Specifications Bases Control Program	1
3.4.8 LA01	3.1.a.2.B	CTS 3.1.a.2.B requires two residual heat removal (RHR) trains be OPERABLE with each train consisting of the following: 1) one OPERABLE residual heat removal pump; 2) one OPERABLE residual heat removal heat exchanger; and, 3) an OPERABLE flow path consisting of all valves and piping associated with the above train of components and required to remove decay heat from the core during normal shutdown situations. This flow path shall be capable of taking suction from the appropriate Reactor Coolant System hot leg and returning to the Reactor Coolant System. ITS LCO 3.4.8 requires two RHR loops to be OPERABLE, but does not define the components and the associated flow path that comprise an OPERABLE RHR train. This changes the CTS by moving the description of the RHR trains to the Bases.	ITS Bases	Technical Specifications Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.4.10 LA01	3.1.a.3	CTS 3.1.a.3 ACTIONS Note states, in part, that during a hydro test of the RCS, the pressurizer safety valves may be blanked provided that the relief valves and safety valves of the discharge pump are set to protect the system. The Note for ITS LCO 3.4.10 does not include the statements may be "blanked" or "to protect the system." The LCO 3.4.10 Note uses the term "inoperable". This changes the CTS by moving the statements may be "blanked" and "to protect the system" to the Bases.	ITS Bases	Technical Specifications Bases Control Program	2
3.4.12 LA01	3.1.b.1.c	CTS 3.1.b.1.C states that "the isothermal curve in Figure TS 3.1-2 defines limits to assure prevention of non-ductile failure applicable to low temperature overpressurization events only. Application of this curve is limited to evaluation of LTOP events whenever one or more RCS cold leg temperatures are less than or equal to the LTOP enabling temperature of 200ºF". ITS 3.4.12 does not contain this information. This changes the CTS by moving this information to the Bases.	ITS Bases	Technical Specifications Bases Control Program	1
3.4.12 LA02	3.1.b.4.A	CTS 3.1.b.4.A states, in part, that the overpressure relief valve on the Residual Heat Removal System (RHR 33-1) shall have a set pressure of ≤ 500 psig and shall be aligned to the RCS by maintaining valves RHR 1A, 1B, 2A, and 2B open. CTS 3.1.b.4.A.2 also identifies the RHR System overpressure relief valve number. ITS LCO 3.4.12.a states that an LTOP System shall be OPERABLE with the RHR System LTOP overpressure relief valve with a lift setting ≤ 500 psig and two RHR suction flow paths OPERABLE. Furthermore, the ITS Actions use a similar description for the associated valves. This changes the CTS by moving the details of the overpressure relief valve number and the RHR suction valve numbers to the Bases.	ITS Bases	Technical Specifications Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.4.14 LA01	3.1.a.4.A	CTS 3.1.a.4.A requires the leakage from each RCS PIV specified in Table 3.1-2 to be within the specified limit. CTS 3.1.a.4.B, the specification which provides the action for an inoperable PIV, and CTS 4.2.a.3.a, the Surveillance which checks the RCS PIV leakage, also references Table 3.1-2. CTS Table 3.1-2 contains a list of the RCS PIVs and their associated valve numbers. ITS 3.4.14 does not contain a list of the RCS PIVs or their associated valve numbers. This changes the CTS by relocating the list of RCS PIVs and their associated valve numbers to the Bases.	ITS Bases	Technical Specifications Bases Control Program	1
3.4.14 LA02	3.1-2	CTS Table 3.1-2 is modified by Note (2). Note (2) describes the minimum test differential pressure at which the RCS PIVs are to be tested. CTS 4.2.a.3 Note (1) explains an alternative method of testing the RCS PIVs to satisfy the ALARA requirements. ITS 3.4.14 does not retain these Notes. This changes the CTS by relocating the information in the Notes to the Bases.	ITS Bases	Technical Specifications Bases Control Program	3
3.4.15 LA01	Table TS 4.1-1	Note (a) to Item 19 of CTS Table TS 4.1-1 in the Remarks Section states that the instrument CHECK, CALIBRATE, and TEST Frequencies for the Radiation Monitoring System are applicable only to channels R11 thru R15, R19, R21, and R23. For the RCS Leakage Detection Specification, only instruments R11, R12, and R21 apply. ITS 3.4.15 does not contain this note. This changes the CTS by removing the description of the applicable channels to the Bases.	ITS Bases	Technical Specifications Bases Control Program	1
3.5.1 LA01	3.3.a.1.B	CTS 3.3.a.1.B requires accumulator isolation valves SI-20A and SI-20B to be open. ITS SR 3.5.1.1 requires that the isolation valves be verified open. The ITS does not define the component name of the isolation valves. This changes the CTS by moving the detail of the isolation valves to the Bases.	ITS Bases	Technical Specifications Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.5.1 LA02	4.5.b.2.B	CTS 4.5.b.2.B requires accumulator check valves to be checked for OPERABILITY during each major REFUELING outage. Additionally, CTS 4.5.b.2.B requires accumulator block valves to be checked to assure "valve open" requirements during each major refueling outage. ITS 3.5.1 does not contain these requirements. This changes the CTS by moving these requirements to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	4
3.5.2 LA01	3.3.b.1.A	CTS 3.3.b.1.A requires two SI/RHR trains be OPERABLE with each train consisting of the following: 1) one OPERABLE safety injection pump; 2) one OPERABLE residual heat removal pump; 3) one OPERABLE residual heat removal heat exchanger; and 4) an OPERABLE flow path consisting of all valves, piping, and interlocks associated with the above train of components and required to function during accident conditions. This flow path shall be capable of taking suction from the Refueling Water Storage tank upon a Safety Injection signal and after manual transfer taking suction from the containment sump. ITS LCO 3.5.2 requires two ECCS trains to be OPERABLE, but does not define the components and the associated flow path that comprise an OPERABLE ECCS train. This changes the CTS by moving the description of the ECCS trains to the Bases.	ITS Bases	Technical Specifications Bases Control Program	1
3.5.2 LA02	4.5.b.2.A	CTS 4.5.b.2.A requires the containment sump outlet valves to be tested during the pump tests. ITS 3.5.2 does not contain this requirement. This changes the CTS by relocating this Surveillance Requirement to the IST Program.	IST Program	10 CFR 50.55a	4

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.5.2 LA03	4.5.b.1.A	CTS 4.5.b.1.A requires that the safety injection and residual heat removal pumps are demonstrated OPERABLE quarterly during power operation. ITS 3.5.2.4 requires a similar verification in accordance with the Inservice Testing Program. This changes the CTS by moving the specific Frequency for this test (quarterly) to the Inservice Testing (IST) Program.	IST program	10 CFR 50.55a	3
3.6.1 LA01	1.0.g.1, 1.0.g.2, 1.0.g.4, 1.0.g.5	CTS 1.0.g states "CONTAINMENT SYSTEM INTEGRITY is defined to exist when: 1.0.g.1 The non-automatic Containment System isolation valves and blind flanges are closed, except as provided in TS 3.6.b; 1.0.g.2 The reactor containment vessel …equipment hatches are properly closed; 1.0.g.4 The required automatic Containment System isolation valves are OPERABLE, except as provided in TS 3.6.b; and 1.0.g.5 All requirements of TS 4.4 with regard to Containment System leakage and test frequency are satisfied." ITS 3.6.1 states "Containment shall be OPERABLE." This changes the CTS by moving the reference to penetration and equipment hatch requirements to the Bases.	Bases	Technical Specifications Bases Control Program	2
3.6.1 LA02	4.4.e	CTS 4.4.e states, in part, that the check and butterfly valves will be leak tested in accordance with TS 4.4.B during each refueling outage, "except that the pressure will be applied in a direction opposite to that which would occur post-LOCA." ITS SR 3.6.1.1, which is the Surveillance that requires Type C leak rate testing, does not include this specific allowance. This changes the CTS by moving the details of the manner in which the leak test is performed to the Containment Leakage Rate Testing Program.	CLRT Program	CLRT Program	4

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.6.1 LA03	Table TS 4.1-3 Equipment Test 12, including footnote 1	CTS Table TS 4.1-3 Equipment Test 12 requires a visual inspection of the guard pipes each REFUELING outage. Note 1 to CTS Table TS 4.1-3 requires, in part, that the containment isolation trip (i.e., the containment isolation valves) be tested to verify OPERABILITY following maintenance on equipment that could affect the operation. ITS 3.6.1 does not include this requirement. This changes the CTS by moving the visual inspection of the guard pipes and post-maintenance testing for the guard pipes to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	4
3.6.2 LA01	1.0.g.3	CTS 1.0.g states "CONTAINMENT SYSTEM INTEGRITY is defined to exist when: 1.0.g.3 At least one door in both the personnel and the emergency airlocks is properly closed." ITS 3.6.1 states "Two containment air locks shall be OPERABLE." This changes the CTS by moving the reference to the air lock door closure requirement to the Bases.	Bases	Technical Specifications Bases Control Program	2
3.6.3 LA01	Table TS 4.1-3 Equipment test 16 footnote 8	CTS Table TS 4.1-3 Equipment Test 16 requires an OPERABILITY test on the containment purge and vent isolation valves each REFUELING cycle. The test is modified by Note 8, which states that "this test shall demonstrate that the valve(s) close in $\leq$ 5 seconds. ITS SR 3.6.3.5 only requires verification that the isolation time of each containment purge and vent isolation valve is within limits. This changes the CTS by moving the time requirement ($\leq$ 5 seconds) to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	4
3.6.3 LA02	Table TS 4.1-3 Equipment Test 16 Frequency	CTS Table TS 4.1-3 Equipment Test 16 requires that the Containment Purge and Vent Isolation Valves are demonstrated OPERABLE each REFUELING cycle. ITS 3.6.3.5 requires a similar verification in accordance with the Inservice Testing Program. This changes the CTS by moving the specific Frequency for this test (each Refueling Outage) to the Inservice Testing (IST) Program.	IST Program	10 CFR 50.55a	3

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.6.5 LA01	3.6.e	CTS 3.6.e states that the reactor shall not be taken above the COLD SHUTDOWN condition unless the containment ambient temperature is > 40°F. ITS 3.6.5 does not maintain this minimum containment temperature limit. This changes the CTS by moving the minimum containment temperature limit to the USAR.	USAR	10 CFR 50.59	4
3.6.6 LA01	3.3.c.1.A.1, 3.3.c.1.A.2, 4.5.a.2.B	CTS 3.3.c.1.A.1 requires, in part, that two containment spray trains are OPERABLE with each train comprised of one containment spray pump and an OPERABLE flow path consisting of all valves and piping required to function during accident conditions. It also requires that there is a flow path that is capable of taking suction from the Refueling Water Storage Tank. CTS 3.3.c.1.A.2 requires that two trains of containment fancoil units are OPERABLE with two fancoils units in each train. CTS 4.5.a.2.B also requires a minimum of 76 spray nozzles per containment spray train to be OPERABLE. ITS LCO 3.6.6 requires that two containment spray trains and two containment cooling trains shall be OPERABLE, but does not include the details of what comprises an OPERABLE containment spray or cooling train. This changes the CTS by moving the description of containment spray and containment fancoil unit trains to the Bases.	Bases	Technical Specifications Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.6.6 LA02	4.5.a.2.A, 4.5.a.2.B, 4.5.a.3	CTS 4.5.a.2.A states, in part, that the Containment Vessel Internal Spray System test shall be performed "with the isolation valves in the supply lines at the containment blocked closed." ITS SR 3.6.6.6 requires verification that the containment spray pump starts, but does not contain the requirement that the isolation valves in the supply line are blocked closed (which is performed to ensure that actual spraying of the containment does not occur). CTS 4.5.a.2.B states, in part, that the Containment Spray Header test be performed by "using an air or smoke test." ITS SR 3.6.6.8 only requires verification that the spray nozzles are unobstructed. CTS 4.5.a.3 states, in part, that the fancoil units are to be tested to "verify proper operation of the motor-operated service water outlet valves and the fancoil emergency discharge and associated backdraft dampers." ITS SR 3.6.6.7 only requires verification that the containment cooling train starts, but does not contain the specific details listed in the CTS. This changes the CTS by moving the details of how the Containment Spray System test, the spray nozzle test, and the containment cooling train tests are performed to the Bases.	Bases	Technical Specifications Bases Control Program	3
3.6.6 LA03	4.5.b.1.A	CTS 4.5.b.1.A requires that the containment spray pumps are demonstrated OPERABLE quarterly during power operation. ITS 3.6.6.4 requires a similar verification in accordance with the Inservice Testing Program. This changes the CTS by moving the specific Frequency for this test (quarterly) to the Inservice Testing (IST) Program.	IST Program	10 CFR 50.55a	3

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.6.7 LA01	3.3.c.2.A.2	CTS 3.3.c.2.A.2 states that the spray additive system "Valves and piping are capable of adding NaOH solution from the additive tank to a containment spray system." ITS LCO 3.6.7 requires the Spray Additive System shall be OPERABLE, but the details of what constitutes an OPERABLE system are moved to the Bases. This changes the CTS by moving the details of what constitutes an OPERABLE Spray Additive System to the Bases.	Bases	Technical Specifications Bases Control Program	1
3.6.8 LA01	1.0.g.2	CTS 1.0.g states, in part, "CONTAINMENT SYSTEM INTEGRITY is defined to exist when: 1.0.g.2 The … shield building equipment hatches are properly closed." ITS 3.6.8 states "The shield building shall be OPERABLE." This changes the CTS by moving the reference to equipment hatch requirements to the Bases.	Bases	Technical Specifications Bases Control Program	1
3.6.8 LA02	4.4.c.4	CTS 4.4.c.4 states, in part, that a "simulated safety injection signal" is used as a start signal for testing of each shield building ventilation system train. ITS SR 3.6.8.2 states, in part, that the Surveillance uses a "start" signal with no implication of a specific type of signal. This changes the CTS by moving the details of the type of initiation signal used during Surveillance testing to the Bases.	Bases	Technical Specifications Bases Control Program	3
3.6.10 LA01	3.6.c.1	CTS 3.6.c.1 states, in part, that both trains of the Shield Building Ventilation System (SBVS), "including filters," shall be OPERABLE. ITS 3.6.10 states that two SBVS trains shall be OPERABLE. This changes the CTS by moving the requirement for the filters to the Bases.	Bases	Technical Specifications Bases Control Program	1
3.7.2 LA01	4.7	CTS 4.7 states the main steam isolation valves shall be tested once per operating cycle with a closure time of 5 seconds or less. ITS SR 3.7.2.1 does not include the closure time limits. This changes the CTS by moving the MSIV closure time limit to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	3

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.7.2 LA02	4.7	CTS 4.7 requires the MSIV closure time to be verified once per operating cycle. ITS SR 3.7.2.1 requires a similar verification in accordance with the Inservice Testing Program. This changes the CTS by moving the specific Frequency for this test (once per operating cycle) to the Inservice Testing (IST) Program.	IST Program	10 CFR 50.55a	3
3.7.5 LA01	3.4.b.1.A, 3.4.b.1.B	CTS 3.4.b requires auxiliary feedwater train "A" and auxiliary feedwater train "B" are OPERABLE and capable of … delivering flow to the associated steam generator. Additionally, it requires the turbine driven auxiliary feedwater train is OPERABLE and capable of … delivering flow to both steam generators. Furthermore, CTS 3.4.b also requires that the auxiliary feedwater pump low discharge pressure and low suction pressure trip channels are OPERABLE. ITS LCO 3.7.5 requires three AFW trains to be OPERABLE. The ITS does not define the component and the associated flow path that comprise an OPERABLE AFW train. This changes the CTS by moving the description of the AFW trains to the Bases.	Bases	Technical Specification Bases Control Program	1
3.7.5 LA02	3.4.b.1.C, 3.4.b.1.D, 3.4.b.5, Table TS 4.1-1 Channel Descriptions 43 and 46	CTS 3.4.b.1.C requires the auxiliary feedwater pump low discharge pressure trip channels to be OPERABLE when the Reactor Coolant System is heated > 350°F. CTS 3.4.b.1.D requires the auxiliary feedwater pump low suction pressure trip channels to be OPERABLE when the Reactor Coolant System is heated > 350°F. Additionally, CTS 3.4.b.5 provides the Actions for an inoperable auxiliary feedwater pump low discharge pressure channel or an inoperable auxiliary feedwater pump low suction pressure channel. CTS Table TS 4.1-1 Items 43 and 46 require a quarterly functional test and a refueling cycle calibration test of the AFW pump low discharge pressure trip channels and the AFW pump low suction pressure trip channels.	TRM	10 CFR 50.59	4

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.7.5 LA02 (continued)	3.4.b.1.C, 3.4.b.1.D, 3.4.b.5, Table TS 4.1-1 Channel Descriptions 43 and 46	ITS 3.7.5 does not contain these requirements. This changes the CTS by moving these requirements to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	4
3.7.5 LA03	3.4.b.7.A, 3.4.b.7.B, 3.4.b.7.C	CTS 3.4.b.7 states that when the reactor power is < 15% of RATED POWER, the corresponding auxiliary feedwater train is not inoperable with the auxiliary feedwater pump control switches in the control room in the "pull out" position, valves AFW-2A and AFW-2B in a throttled or closed position, and valves AFW-10A and AFW-10B in the closed position. ITS SR 3.7.5.1 Note, SR 3.7.5.3 Note, and SR 3.7.5.4 Note 2 states that AFW train(s) may be considered OPERABLE during alignment and operation for steam generator level control when THERMAL POWER is < 15% RTP, if it is capable of being manually realigned to the AFW mode of operation. The ITS does not include the specific details (e.g., valves AFW-10A and AFW-10B may be in the closed position) concerning AFW alignment for steam generator level control. This changes the CTS by moving the description of the details concerning AFW alignment for steam generator level control to the Bases.	Bases	Technical Specification Bases Control Program	1
3.7.5 LA04	4.8.c	CTS 4.8.c states "The valves on the discharge side of the turbine-driven pump that direct flow to either steam generator shall be tested by operator action whenever the turbine-driven pump is tested." ITS 3.7.5 does not include this requirement. This changes the CTS by relocating this Surveillance Requirement to the IST Program.	IST Program	10 CFR 50.55a	4

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.7.7 LA01	3.3.d.1.A	CTS 3.3.d.1.A requires two component cooling water trains be OPERABLE with each train consisting of the following: 1) one component cooling water pump; 2) one component cooling water heat exchanger; and 3) an OPERABLE flow path consisting of all valves and piping associated with the above train of components and required to function during accident conditions. ITS LCO 3.7.7 requires two CC trains to be OPERABLE, but does not define the components and the associated flow path that comprise an OPERABLE CC train. This changes the CTS by moving the description of the CC trains to the Bases.	Bases	Technical Specification Bases Control Program	1
3.7.8 LA01	3.3.e.1.A, Table TS 3.5-1 Functional Unit 7	CTS 3.3.e.1.A requires two service water trains be OPERABLE with each train consisting of the following: 1) two service water pumps; 2) an OPERABLE flow path consisting of all valves and piping associated with the above train of components and required to function during accident conditions. This flow path shall be capable of taking a suction from the forebay and supplying water to the redundant safeguards headers; and 3) an OPERABLE turbine building service water header isolation valve and associated isolation logic capable of closing the header isolation valve, or a closed and deactivated turbine building service water header isolation valve. CTS 3.3.e.1.B requires the Forebay Water Level Trip System to be OPERABLE. CTS Table 3.5-1 Functional Unit 7 states the Forebay Level Function trips the circulating water pumps. ITS LCO 3.7.8 requires two SW trains to be OPERABLE. The ITS does not define the components, the associated flow path, or the forebay level trip system that comprise an OPERABLE SW train. This changes the CTS by moving the description of the SW trains to the Bases.	Bases	Technical Specification Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.7.10 LA01	3.12.b	CTS 3.12.b states, in part, that both trains of the Control Room Post-Accident Recirculation (CRPAR) System, "including filters," shall be OPERABLE. ITS 3.7.10 states that two CPRAR trains shall be OPERABLE. This changes the CTS by moving the requirement for the filters to the Bases.	Bases	Technical Specification Bases Control Program	1
3.7.10 LA02	4.17.a.2	CTS 4.17.a.2 requires automatic initiation of the CRPAR System via a "high radiation" signal and a "safety injection" signal. ITS SR 3.7.10.3 requires a verification that each CRPAR train actuates on an actuation signal. This changes the CTS by moving the specific type of actuation signal to the ITS Bases.	Bases	Technical Specification Bases Control Program	1
3.7.12 LA01	3.6.c.2	CTS 3.6.c.2 states, in part, that both trains of the Auxiliary Building Special Ventilation (ASV) System, "including filters," shall be OPERABLE. ITS 3.7.12 does not contain this requirement. This changes the CTS by moving the requirement for the filters to the Bases.	Bases	Technical Specification Bases Control Program	1
CTS 3.14 LA01	3.14.a	CTS 3.14.a requires all safety related snubbers to be OPERABLE, while critical. CTS 4.14 provides the testing requirements for the safety related snubbers. The ITS does not include the requirements for inspection and testing of safety related snubbers. This changes the CTS by moving the explicit snubber testing requirements from the Technical Specifications to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	4
3.8.1 LA01	3,7,a,1, 3.7.a.2	CTS 3.7.a.1 and CTS 3.7.a.2 require two offsite power sources to be fully operational and energized to carry power to the plant 4160 V AC buses and provides details of what constitutes offsite power sources. ITS 3.8.1 requires two qualified circuits between the	Bases	Technical Specification Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.8.1 LA01 (continued)	3,7,a,1, 3.7.a.2	offsite transmission network and the onsite Class 1E AC Electrical Power Distribution System to be OPERABLE, but the details of what constitutes OPERABLE qualified circuits is contained in the ITS Bases. This changes the CTS by moving the details of what constitutes OPERABLE qualified circuits to the ITS Bases.	Bases	Technical Specification Bases Control Program	1
3.8.1 LA02	3.7.a.8, 3.7.b.4, 3.7.b.5	CTS 3.7.a.8 requires, in part, at least one pair of transmission lines be OPERABLE. CTS 3.7.b.4 and CTS 3.7.b.5 provide actions to be taken when the requirements of CTS 3.7.a.8 are not met. ITS 3.8.1 does not include any requirements for the transmission lines that provide power to the onsite transformers (i.e., the qualified offsite circuits). This changes the CTS by relocating the LCO and Actions for the transmission lines to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	4
3.8.1 LA03	4.6.a.3	CTS 4.6.a.3 requires each diesel generator be inspected each major refueling outage. The ITS does not include this DG inspection requirement. This changes the CTS by moving the explicit DG inspection Surveillance from the Technical Specifications to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	4
3.8.6 LA01	4.6.b.1	CTS 4.6.b.1 requires each battery cell voltage to be measured "to the nearest hundredth volt." ITS SR 3.8.6.2 and 3.8.6.5 requires verification that each pilot cell voltage and battery connected cell voltage, respectively is ≥ 2.07 V. This changes the CTS by relocating the details that the cell voltage measurement be "to the nearest hundredth volt" to the Bases.	Bases	Technical Specification Bases Control Program	3

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.8.9 LA01	3.7.a.3, 3.7.a.4, 3.7.a.5	CTS 3.7.a.3 requires the 4160V Buses 1-5 and 1-6 to be energized. CTS 3.7.a.4 requires the 480V Buses 1-52 and 1-62 and their MCC's to be energized from their respective station service transformers. CTS 3.7.a.5 requires the 480 V buses 1-51 and 1-61 to be energized from their respective station service transformers. ITS LCO 3.8.9, in part, requires the Train A and B AC electrical power distribution subsystems to be OPERABLE. This changes the CTS by moving the specific names of the buses, the associated nominal bus voltages (i.e., 4160 V and 480 V), that the buses must be energized, and that the 480 V buses and MCC's are energized from their respective station service transformers from the CTS to the Bases.	Bases	Technical Specification Bases Control Program	1
3.9.1 LA01	3.8.a.5	CTS 3.8.a.5 requires the boron concentration of the Reactor Coolant System be determined "by chemical analysis" daily. ITS SR 3.9.1.1 requires verification that boron concentration is within the limit specified in the COLR. ITS SR 3.9.1.1 does not specify that the boron concentration be determined by chemical analysis. This changes the CTS by moving details of how the boron concentration is determined from the CTS to the Bases. The discussion of the change from daily to 72 hours is provided in DOC L01.	Bases	Technical Specification Bases Control Program	3

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.9.2 LA01	3.8.a.3	CTS 3.8.a.3, in part, states that core subcritical neutron flux shall be monitored by two neutron monitors, "each with continuous visual indication in the control room" and one with audible indication "in the containment." ITS 3.9.2 LCO states that two source range neutron flux monitors shall be OPERABLE and one source range audible count rate circuit shall be OPERABLE. This changes the CTS by moving the requirement that each monitor have a "continuous visual indication in the control room" from the CTS to the Bases. This also changes the CTS by changing the location of the audible indication from the containment to the control room and moving this requirement from the CTS to the Bases.	Bases	Technical Specification Bases Control Program	1
3.9.3 LA01	3.1.a.2.B	CTS 3.1.a.2.B requires one residual heat removal (RHR) train be OPERABLE (see DOC A03) with the train consisting of the following: 1) one OPERABLE residual heat removal pump; 2) one OPERABLE residual heat removal heat exchanger; and, 3) an OPERABLE flow path consisting of all valves and piping associated with the above train of components and required to remove decay heat from the core during normal shutdown situations. This flow path shall be capable of taking suction from the appropriate Reactor Coolant System hot leg and returning to the Reactor Coolant System. ITS LCO 3.9.3 requires one RHR loop to be OPERABLE, but does not define the components and the associated flow path that comprise an OPERABLE RHR train. This changes the CTS by moving the description of the RHR trains to the Bases.	Bases	Technical Specification Bases Control Program	1

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.9.4 LA01	3.1.a.2.B	CTS 3.1.a.2.B requires two residual heat removal (RHR) trains be OPERABLE with each train consisting of the following: 1) one OPERABLE residual heat removal pump; 2) one OPERABLE residual heat removal heat exchanger; and, 3) an OPERABLE flow path consisting of all valves and piping associated with the above train of components and required to remove decay heat from the core during normal shutdown situations. This flow path shall be capable of taking suction from the appropriate Reactor Coolant System hot leg and returning to the Reactor Coolant System. ITS LCO 3.9.4 requires two RHR loops to be OPERABLE, but does not define the components and the associated flow path that comprise each OPERABLE RHR train. This changes the CTS by moving the description of the RHR trains to the Bases.	Bases	Technical Specification Bases Control Program	1
3.9.6 LA01	3.8.a.1, 3.8.a.1 footnote (1)	CTS 3.8.a.1.a requires at least one door in each personnel air lock to be capable of being closed "within 30 minutes." CTS 3.8.a.1.a is modified by a footnote (1) that states "Administrative controls ensure that appropriate personnel are aware that both personnel air lock doors are open; a specified individual(s) is designated and available to close the air lock following a required evacuation of containment; and, any obstruction(s) (e.g., cables and hoses) that could prevent closure of an open air lock can be quickly removed." ITS 3.9.6 does not contain this footnote information or the 30 minute requirement. This changes the CTS by moving the information contained in the footnote and the 30 minute requirement to the Bases.	Bases	Technical Specification Bases Control Program	3

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
CTS 3.8.a.3 LA01	3.8.a.3	CTS 3.8.a.3 requires the reactor to be subcritical for 148 hours prior to movement of its irradiated fuel assemblies. The ITS does not include this requirement. This changes the CTS by moving the explicit decay time requirement from the Technical Specifications to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	4
4.0 LA01	5.2	CTS 5.2 describes the various design features of the containment. The ITS does not contain this information. This changes the CTS by moving the description of the containment to the USAR.	USAR	10 CFR 50.59	1
4.0 LA02	5.3.a	CTS 5.3.a contains details of fuel assembly design, such as the design of lead-test-assemblies and their clad materials. The ITS does not contain these details. This changes the CTS by moving the details about the lead-test-assemblies and their cladding material to the USAR.	USAR	10 CFR 50.59	1
5.4 LA01	6.8.b, 6.8.c	CTS 6.8.b requires that changes to procedures are made in accordance with the provisions of the quality assurance program. CTS 6.8.c requires that procedures are reviewed in accordance with the provisions of the quality assurance program. ITS 5.4 does not include these requirements. This changes the CTS by moving these details of procedure changes and reviews to the NFQAPD.	NFQAPD	10 CFR 50.54(a)	4

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
5.5 LA01	6.18.b.1, 6.18.b.2	CTS 6.18.b.1 requires changes to the ODCM to be documented and records of reviews performed to be retained as required by the quality assurance program. CTS 6.18.b.2 requires changes to the ODCM to be effective after review and acceptance by the PORC. ITS 5.5.1.c.1 requires changes to the ODCM to be documented and records of reviews performed to be retained. ITS 5.5.1.c.2 requires changes to the ODCM to become effective after the approval of the plant manager. This changes the CTS by moving the record retention requirements reference and the PORC review and approval requirements to the Nuclear Facility Quality Assurance Program Description (NFQAPD). DOC M01 describes the addition of the plant manager approval.	NFQAPD	10 CFR 50.54(a)	3
5.5 LA02	4.2.a, 4.2.a.1	CTS 4.2.a and 4.2.a.1 provide requirements for the In-Service Inspection Program. The ITS does not include In-Service Inspection Program requirements. This changes the CTS by moving these requirements from the Technical Specifications to the In-Service Inspection (ISI) Program.	ISI Program	10 CFR 50.55a	4
5.7 LA01	6.13 Footnote (1)	CTS 6.13 Footnote (1) uses the title "Health Physics personnel." ITS 5.7.1.c and 5.7.2.c uses the generic title "Individuals qualified in radiation protection procedures." This changes the CTS by moving the specific KPS organizational title to the appropriate plant procedures and replacing them with generic titles.	Plant Procedures	10 CFR 50.59 (via ITS 5.4.1.a)	3
CTS 6.0 LA01	6.4	CTS 6.4 states that a retraining and replacement training program for the Plant Staff shall be maintained and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI-N18.1-1971 and 10 CFR Part 55. ITS Chapter 5.0 does not require such a program. This changes the CTS by moving the requirements for the retraining and replacement training program to the USAR.	USAR	10 CFR 50.59 or 10 CFR 50.71(e)	4

Table LA – Removed Details

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
CTS 6.0 LA02	6.11.a	CTS 6.11 provides requirements for the Radiation Protection Program procedures. The ITS does not include these requirements. This changes the CTS by moving the requirements for the Radiation Protection Program to the USAR.	USAR	10 CFR 50.59 or 10 CFR 50.71(e)	4
CTS 6.0 LA03	6.11.b	CTS 6.11.b, "Iodine Monitoring," describes a program to ensure the capability to accurately determine the airborne in-plant iodine concentration under accident conditions. ITS 5.5 does not include this program. This changes the CTS by moving the requirements for the Iodine Monitoring Program to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	4
CTS 6.0 LA04	6.16.b.2	CTS 6.16.b.2, "Radiological Environmental Monitoring Program provides a program to monitor the radiation and radionuclides in the environs of the plant. ITS Chapter 5.0 does not require such a program. This changes the CTS by moving the requirements for the Radiological Environmental Monitoring Program to the Offsite Dose Calculation Manual (ODCM).	ODCM	ITS 5.5.1	4
CTS 6.0 LA05	1.0.o.3, 6.16.a.1, 6.17	CTS Definition 1.0.o.3 contains the definition for the Process Control Program (PCP). CTS 6.16.a.1 requires written procedures for the PCP. CTS 6.17 describes the control for changes to the PCP. The ITS does not include these requirements. This changes the CTS by moving the requirements of the PCP to the USAR.	USAR	10 CFR 50.59 or 10 CFR 50.71(e)	4
CTS 6.0 LA06	6.19	CTS 6.19 requires reporting major modifications to the liquid, gaseous, and solid radwaste treatment system to the Commission as part of the Radioactive Effluent Release Report and explains what needs to be included in the report and the approval process. The ITS does not contain this requirement. This changes the CTS by moving the requirement for reporting major modifications to the liquid, gaseous, and solid radwaste treatment system to the Offsite Dose Calculation Manual (ODCM).	ODCM	ITS 5.5.1	4

Table LA – Removed Details

Change Types (only applicable to LA DOCs):

Type 1 – Removing Details of System Design and System Description, Including Design Limits
Type 2 – Removing Descriptions of System Operation
Type 3 – Removing Procedural Details for Meeting TS Requirements or Reporting Requirements
Type 4 – Removal of LCO, SR, or other TS requirement to the TRM, USAR, ODCM, NFQAPD, CLRT Program, IST Program, or ISI Program, or Setpoint Control Program

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 M01	CTS 1.0.j states that the INTERMEDIATE SHUTDOWN Tavg is between 200°F and 540°F. Additionally, CTS 1.0.j states that the HOT SHUTDOWN Tavg is greater than or equal to 540°F. ITS Table 1.1-1 states that MODE 4, Hot Shutdown, Tavg is between 200°F and 350°F and MODE 3, Hot Standby, Tavg is greater than 350°F. This changes the transition point from INTERMEDIATE SHUTDOWN to HOT SHUTDOWN from 540°F to 350°F.	1.1 Table 1.1-1	1.o.j
2.0 M01	CTS 2.1.a states that the combination of RATED POWER level, coolant pressure, and coolant temperature shall not exceed the limits specified in the COLR. ITS 2.1.1, in part, states that the combination of THERMAL POWER, Reactor Coolant System (RCS) highest loop average temperature, and pressurizer pressure shall not exceed the limits specified in the COLR. This changes the CTS by requiring the highest loop average temperature to be used in lieu of the average reactor coolant temperature.	2.1.1	2.1.a
3.0 M01	Not used.	LCO 3.0.8	3.14.b
3.0 M02	CTS 4.0.b states, "Each surveillance requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25% of the specified surveillance interval." ITS SR 3.0.2 states "The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the frequency is met. For Frequencies specified as "once," the above interval extension does not apply. If a Completion Time requires periodic performance on a "once per …" basis, the above Frequency extension applies to each performance after the initial performance. Exceptions to this Specification are stated in the individual Specifications. This changes the CTS by adding, "For Frequencies specified as "once," the above interval extension does not apply." The remaining changes to CTS 4.0.b are discussed in DOC A09 and DOC L03.	SR 3.0.2	4.0.b

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 M03	CTS 3.0.c requires action to be initiated within 1 hour, to reach HOT STANDBY (equivalent to ITS MODE 2) within the next 6 hours, HOT SHUTDOWN (equivalent to ITS MODE 3) within the following 6 hours, and COLD SHUTDOWN (equivalent to ITS MODE 5) within the subsequent 24 hours. ITS 3.0.3 requires action to be initiated within 1 hour, to be in MODE 3 within 7 hours, to be in MODE 4 within 13 hours, and MODE 5 within 37 hours. Additionally, CTS 3.0.c states the shutdown time limits in sequential order; i.e., each time limit is measured from the completion of the previous step. ITS LCO 3.0.3 states the time limits (Completion Times) from the time the condition is entered. This changes the CTS reducing the time to be in MODE 3 from 13 hours to 7 hours and adding a requirement to be MODE 4 within 13 hours.	LCO 3.0.3	3.0.c
3.1.1 M01	CTS 3.10.a does not supply any explicit time to restore the SDM to within limits when the SDM is not within its limit. As a result, LCO 3.0.c would be entered, which requires action to be initiated within 1 hour and to place the unit in HOT STANDBY (equivalent to ITS MODE 2) within the next 6 hours, in HOT SHUTDOWN (equivalent to ITS MODE 3) within the following 6 hours, and in COLD SHUTDOWN (equivalent to ITS MODE 5) within the subsequent 36 hours. Under similar conditions, ITS 3.1.1 provides 15 minutes to initiate boration to restore SDM to within limits. This changes the CTS by providing a maximum time limit of 15 minutes to initiate boration to restore SDM to within limits prior to entering ITS LCO 3.0.3.	3.1.1 ACTION A	3.10.a
3.1.1 M02	CTS 3.10.a does not provide any Surveillance Requirements for verifying that the SDM is within the limits specified in the COLR. CTS Table 4.1-2 provides one parameter of the SDM in the boron concentration test which is performed two times per week. ITS SR 3.1.1.1 requires verifying that the SDM is within the limits specified in the COLR every 24 hours. This changes the CTS by adding a new Surveillance Requirement to verify the SDM.	SR 3.1.1.1	3.10.a, Table 4.1-2
3.1.2 M01	CTS 4.9 states, in part, that after normalization, the actual boron concentration of the coolant shall be periodically compared with the predicted value. ITS SR 3.1.2.1 requires verification of the measured core reactivity is within ± 1% Δk/k of predicted values at least once prior to entering MODE 1 after each refueling and after 60 effective full power days (EFPD) it should be verified every 31 EFPD thereafter. This changes the CTS by specifying Frequencies for verifying measured core reactivity is within ± 1% Δk/k of predicted values.	SR 3.1.2.1	4.9

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.2 M02	CTS 4.9 requires that if the difference between the observed and predicted steady-state concentrations reach the equivalent of 1% in reactivity, that an evaluation as to the cause of the discrepancy shall be made and reported to the Commission within 30 days. ITS 3.1.2 requires that if the measured core reactivity is not within limits, within 7 days a re-evaluation of the core design and safety analysis, a determination that the reactor core is acceptable for continued operation, and establishment of appropriate operating restrictions and SRs are required. If the re-evaluation of the core design and safety analysis to determine that the reactor core is acceptable for continued operation, and the establishment of appropriate operating restrictions and SRs cannot be accomplished within 7 days, then the reactor is required to be in MODE 3 within 6 hours. This changes the CTS by requiring a re-evaluation of the core design and safety analysis, a determination that the reactor core is acceptable for continued operation, and establishment of appropriate operating restrictions and SRs instead of requiring an evaluation of the cause of the discrepancy shall be made and reported to the Commission. This also changes the Completion Time from 30 days to 7 days.	3.1.2 ACTION A	4.9
3.1.3 M01	CTS 3.1.f.3 requires, in part, that the moderator temperature coefficient (MTC) shall be as specified in the COLR when the reactor is critical. The COLR provides both an upper MTC limit and a lower MTC limit. If an MTC limit is not met, CTS 3.1.f.4 provides 24 hours to develop and maintain administrative control rod withdrawal limits sufficient to restore the MTC to within the limits. ITS 3.1.3 requires the upper MTC Limit to be met in MODE 1 and MODE 2 with $k_{eff} \geq 1.0$ and the lower MTC limit to be met in MODES 1, 2, and 3. Furthermore, ITS 3.1.3 does not provide any time to restore the lower MTC to within limits. If the lower MTC limit is not met, ITS 3.1.3 ACTION C requires the unit to be in MODE 4 within 12 hours, which places the unit outside the new proposed Applicability. This changes the CTS by requiring the lower MTC limit to be met in MODE 3 and when it cannot be met, to be in MODE 4 within 12 hours.	3.1.3 ACTION C	3.1.f.3

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.3 M02	CTS 3.10.f.4.B requires that if the development and maintenance of administrative control rod withdrawal limits sufficient to restore the moderator temperature coefficient to within the limits specified in the COLR cannot be satisfied within 24 hours, then to be in HOT STANDBY within 6 hours. The reactivity condition (Δk/k) for HOT STANDBY, as defined in CTS 1.0.j, is < 0.25%. Under similar conditions (i.e., if the establishment of administrative withdrawal limits for control banks to maintain MTC within limit is not met within 24 hours) ITS 3.1.3 ACTION B requires the unit to be in MODE 2 with keff < 1.0 within 6 hours. This changes the CTS by requiring the unit to be in MODE 2 with keff < 1.0 (i.e., Δk/k < 0.0%) in lieu of Δk/k < 0.25%.	3.1.3 ACTION B	3.10.f.4.B
3.1.3 M03	CTS 3.1.f.3 does not provide any Surveillance Requirements for verifying that the MTC is within the limits specified in the COLR. ITS SR 3.1.3.1 requires verification that the MTC is within the upper limit prior to entering MODE 1 after each refueling. ITS SR 3.1.3.2 requires that the MTC is within the lower limit once each cycle. This changes the CTS by adding new Surveillance Requirements to verify the upper and lower MTC are within limits.	SR 3.1.3.1, SR 3.1.3.2	3.1.f.3
3.1.4 M01	CTS 3.10.e.2 states, in part, that when reactor power is < 85% but ≥ 50% of rating, the rod cluster control assemblies shall be maintained within ± 24 steps from their respective banks. CTS 3.10.g.2 states that not more than one inoperable full length rod shall be allowed at any time. CTS 3.10.h states, in part, that at OPERATING temperature and full flow, the drop time of each full length rod cluster control shall be no greater than 1.8 seconds from loss of stationary gripper coil voltage to dashpot entry. ITS 3.1.4 requires all shutdown and control rods and the individual rod position indication to be OPERABLE in MODES 1 and 2 and requires the 24 step alignment limit to be met when < 85% RTP in MODES 1 and 2. This changes the CTS by requiring all shutdown and control rods and the individual rod position indication to be OPERABLE in MODES 1 and 2 and requires the 24 step alignment limit to be met when < 85% RTP in MODES 1 and 2, in lieu of when <85% RTP and > 50% RTP.	3.1.4 Applicability	3.10.e.2

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.4 M02	CTS 3.10.e.1 states, in part, that if a rod cluster control assembly is misaligned from its bank by more than ± 12 steps when reactor power is > 85%, then the rod will be realigned or the core power peaking factors shall be determined within four hours and TS 3.10.b applied. If peaking factors are not determined within four hours, the reactor power shall be reduced to < 85% of rating. ITS 3.1.4 ACTION B states that with one rod not within alignment limits when THERMAL POWER is > 85% RTP, to verify SHUTDOWN MARGIN (SDM) or initiate boration to restore SDM to within limits within 1 hour, and to reduce THERMAL POWER to < 85% RTP within 2 hours. CTS 3.10.e.2 states, in part, that if a rod cluster control assembly is misaligned from its bank by more than ± 24 steps when reactor power is < 85 % but > 50%, the rod will be realigned or the core power peaking factors shall be determined within four hours and TS 3.10.b applied. If peaking factors are not determined within four hours, the reactor power shall be reduced to < 50% of rating. ITS 3.1.4 ACTION C states that with one rod not within alignment limits when THERMAL POWER is < 85% RTP, to verify SHUTDOWN MARGIN (SDM) or initiate boration to restore SDM to within limit within 1 hour, to reduce THERMAL POWER to < 50% RTP within 2 hours, to verify SDM is within the limits specified in the COLR once per 12 hours, to perform SR 3.2.1.1 and SR 3.2.1.2 (verification that FQ(Z) is within the required limits) within 72 hours, to perform SR 3.2.2.1 (verification that $F^N_{\Delta H}$ is within the required limits) within 72 hours and to re-evaluate safety analyses and confirm results remain valid for duration of operation under these conditions within 5 days. This changes the CTS by requiring the verification of SDM or initiation of boration to restore SDM to within limit within 1 hour, reduction of THERMAL POWER to < 85% RTP within 2 hours, verification of SDM is within the limits specified in the COLR once per 12 hours, the performance SR 3.2.1.1 and SR 3.2.1.2 within 72 hours, the performance of SR 3.2.2.1 within 72 hours and the re-evaluation of the safety analyses and confirmation that the results remain valid for the duration of operation under these conditions within 5 days.	3.1.4 ACTION C	3.10.e.1, 3.10.e.2

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.4 M03	CTS 3.10.e.3 states that in addition to TS 3.10.e.1 (CTS 3.10.e.1) and TS 3.10.e.2 (CTS 3.10.e.2) if the misaligned rod cluster control assembly is not realigned within eight hours, the rod shall be declared inoperable. CTS 3.10.e does not contain any requirements if 3.10.e.1 or 3.10.e.2 are not met. Therefore, CTS 3.0.c entry would be required. CTS 3.0.c requires action to be initiated within 1 hour and to be in HOT STANDBY (equivalent to ITS MODE 2) in the following 6 hours. ITS 3.1.4 ACTION D states, that if the Required Action and associated Completion Time of Condition B and C are not met, then be in MODE 3 within 6 hours. Additionally, CTS 3.10.e does not contain a requirement for when more than one rod is not within alignment limits. Therefore, CTS 3.0.c entry would also be required for this condition. ITS 3.1.4 ACTION E requires that if more than one rod is not within the alignment limit, then verify SDM is within the limits specified in the COLR or initiate boration to restore the required SDM to within limits within 1 hour and to be in MODE 3 within 6 hours. This changes the CTS by requiring the plant to be placed in MODE 3 if the Required Actions and associated Completion Time of B or C are not met (ITS 3.1.4 ACTION D) and adding a new ACTION (ITS 3.1.4 ACTION E).	3.1.4 ACTION E	3.10.e.1
3.1.4 M04	CTS 3.10.g.2 states that not more than one inoperable full length rod shall be allowed at any time. As a result, if more than one full length rod is inoperable, then LCO 3.0.c would be entered which requires action to be initiated within 1 hour, to be in HOT STANDBY (equivalent to ITS MODE 2) within the next 6 hours and to be in HOT SHUTDOWN (equivalent to ITS MODE 3) within the following 6 hours. CTS 3.10.g.3 states, in part, that with one inoperable full length rod the potential ejected rod worth and associated transient power distribution peaking factors shall be determined by analysis within 30 days. ITS 3.1.4 requires that with one or more rods inoperable to verify the SDM is within the limits specified in the COLR or to initiate boration to restore the SDM to within limits within 1 hour and to be in MODE 3 within 6 hours. This changes the CTS by requiring verification or restoration of the SDM and requiring the unit to be in MODE 3 within 6 hours.	3.1.4 ACTION A	3.10.g.2, 3.10.g.3

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.5 M01	CTS 3.10.d.1 requires the shutdown rods to be withdrawn to within the limits specified in the COLR, but does not provide a Surveillance Requirement to verify that the shutdown rods are within the limits specified in the COLR. ITS SR 3.1.5.1 requires verification that the shutdown banks are within the insertion limits specified in the COLR every 12 hours. This changes the CTS by adding a new Surveillance Requirement to verify that the shutdown banks are within the insertion limits specified in the COLR every 12 hours.	SR 3.1.5.1	3.10.d.1
3.1.6 M01	CTS 3.10.d does not provide any Surveillance Requirements for verifying control bank insertion limits. ITS SR 3.1.6.1 requires verifying that the estimated critical control bank position is within the insertion limits specified in the COLR within 4 hours prior to achieving criticality. ITS SR 3.1.6.2 requires verifying that each control bank insertion is within the insertion limits specified in the COLR every 12 hours. ITS SR 3.1.6.3 requires verification that the overlap and sequence limits specified in the COLR are met for control banks not fully withdrawn from the core every 12 hours. This changes the CTS by adding specific Surveillance Requirements to periodically verify that control banks will be within insertion, sequence and overlap limits specified in the COLR.	SR 3.1.6.1	3.10.d
3.1.8 M01	TS 3.1.f, CTS 3.10.d.3, and CTS 3.10.e state that the limitations of certain specifications may be suspended during the performance of PHYSICS TESTS but does not provide restrictions that must be followed when utilizing the CTS exceptions. ITS 3.1.8 provides the requirements and restrictions for performing testing during PHYSICS TESTS initiated in MODE 2. A Surveillance (SR 3.1.8.3) to verify the SHUTDOWN MARGIN is within limits specified in the COLR every 24 hours and an ACTION (ACTION A) to follow if the SHUTDOWN MARGIN is not met are added. Additionally, a Surveillance (SR 3.1.8.2) to verify that THERMAL POWER is ≤ 5% RTP every 30 minutes and an ACTION (ACTION B) to follow if the THERMAL POWER is not within limit (i.e., it is not ≤ 5% RTP) has been added. This changes the CTS by imposing additional requirements on the application of the test exception LCO.	SR 3.1.8.2, SR 3.1.8.3	3.10.d.3, 3.10.e

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.8 M02	CTS Table TS 3.5-2, Functional Unit 2, Nuclear Flux Power Range, requires three channels to be OPERABLE. However, Note (1) allows one additional channel to be taken out of service during zero power testing. Thus, during zero power PHYSICS TESTS, the CTS only requires two Functional Unit 2 channels to be OPERABLE. ITS LCO 3.1.8, in part, includes an allowance to reduce the required number of channels for ITS LCO 3.3.1, "RPS Instrumentation," Functions 2 (Power Range Neutron Flux) and 3 (Power Range Neutron Flux Rate) from "4" to "3" during PHYSICS TESTS. This changes the CTS by always requiring three channels of Nuclear Flux Power Range be OPERABLE during all MODE 2 PHYSICS TESTS, even zero power PHYSICS TESTS.	LCO 3.1.8	Table TS 3.5-2, Functional Unit 2
3.2.1 M01	CTS 3.10.b.6 provides the Surveillance Requirement for periodically verifying $F_Q^N(Z)$ transient relationship is within limit. CTS 3.10.b.6.B requires the Surveillance to be performed once within 12 hours of achieving equilibrium conditions after reaching a thermal power level > 10% higher than the power level at which the last power distribution measurement was performed in accordance with CTS 3.10.b.6.A. ITS SR 3.2.1.2, which requires a similar Surveillance Requirement, is required after a THERMAL POWER change of $\geq$ 10% RTP. This changes the CTS by requiring the Surveillance to be performed after a power change of $\geq$ 10% RTP, in lieu of > 10% RTP.	SR 3.2.1.2	3.10.b.6, 3.10.b.6.B
3.2.1 M02	CTS 3.10.b.6.C.i states, in part, that the $F_Q^N(Z)$ transient relationship shall be increased by the penalty factor specified in COLR. ITS SR 3.2.1.2 is modified by a Note which requires, in part, that $F_Q^T(Z)$ (i.e., the $F_Q^N(Z)$ transient relationship) shall be increased by the greater of a factor of 1.02 or by an appropriate factor specified in the COLR. This changes the CTS by specifically requiring $F_Q^N(Z)$ transient relationship to be increased by a minimum factor of 1.02.	SR 3.2.1.2	3.10.b.6.C.i

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2.2 M01	CTS 3.10.b.2.A.iii requires that with $F^N_{\Delta H}$ exceeding its limit, a verification that $F^N_{\Delta H}$ is within limits within 24 hours and CTS 3.10.b.2.C, in part, states that with $F^N_{\Delta H}$ exceeding its limit "Subsequent power increases may proceed provided that $F^N_{\Delta H}$ is demonstrated, through incore mapping, to be within its limits prior to exceeding the following thermal power levels: 50% of RATED POWER, 75% of RATED POWER, and within 24 hours of attaining ≥ 95% of RATED POWER." However, under CTS 3.0.b, these measurements do not have to be completed if compliance with the LCO is reestablished. ITS 3.2.2 Condition A contains a Note which states, "Required Actions A.2 and A.4 must be completed whenever Condition A is entered." ITS Required Actions A.2 and A.4 require performance of a $F^N_{\Delta H}$ measurement within 24 hours and prior to exceeding 50% RTP and 75% RTP, and within 24 hours after THERMAL POWER is ≥ 95% RTP. This changes the CTS by requiring the $F^N_{\Delta H}$ measurements to be made even if $F^N_{\Delta H}$ is restored to within its limit.	3.2.2 ACTION A	3.10.b.2.A.iii, 3.10.b.2.C
3.2.4 M01	When the QPTR is > 1.02, CTS 3.10.c.1.B requires the restriction of the maximum thermal power level 2% for every 1% of indicated QPTR > 1.0. This same restriction is also required by CTS 3.10.c.3.A. ITS 3.2.4 Required Action A.1 requires a 3% reduction in THERMAL POWER from RTP for each 1% of QPTR > 1.00. This changes the CTS by requiring the THERMAL POWER reduction from RTP to be 3% in lieu of the current 2% for each 1% of QPTR > 1.00.	3.2.4 ACTION A	3.10.c.1.B
3.2.4 M02	CTS 3.10.c does not provide any Surveillance Requirements for verifying QPTR is within limits. ITS SR 3.2.4.1 requires verifying the QPTR is within limit by calculation every 7 days. If one or more Power Range Neutron Flux channels are inoperable with THERMAL POWER > 75% RTP, then ITS SR 3.2.4.2 (and associated Note) requires verifying QPTR is within limit using the movable incore detectors every 12 hours (after the Power Range Neutron Flux channels are inoperable). Furthermore, ITS SR 3.2.4.1 is modified by a Note that states ITS SR 3.2.4.2 may be performed in lieu of ITS SR 3.2.4.1. This changes the CTS by adding specific Surveillance Requirements to verify the LCO limit is met.	SR 3.2.4.1	3.10.c

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2.4 M03	CTS 1.0.a, the definition of QPTR, states, in part, that "If one excore detector is out-of-service, then the three in-service units are used in computing the average." ITS SR 3.2.4.1 Note 1 states that with input from one Power Range Neutron Flux channel (i.e., an excore detector) inoperable and THERMAL POWER ≤ 75% RTP, the remaining three Power Range Neutron Flux channels can be used for calculating QPTR. This changes the CTS by specifying that the allowance can only be used when ≤ 75% RTP.	SR 3.2.4.1	1.0.a
3.3.1 M01	CTS 3.5.c states, in part, that when the number of channels of a subsystem fall below the limits given in Table TS 3.5-2 Column 3 operation shall be limited according to the requirement shown in Column 6 as soon as practicable. Table TS 3.5-2 Functional Unit 1 (Manual Reactor Trip) Column 3 requires one Manual Reactor Trip channel to be OPERABLE. Thus, while there are two Reactor Manual Trip channels in the KPS design, the CTS allows one of the Reactor Manual Trip channels to be inoperable for an indefinite amount of time; no actions are required when one of the two Manual Reactor Trip channels is inoperable. ITS LCO 3.3.1 requires the RPS instrumentation in Table 3.3.1-1 to be OPERABLE. ITS Table 3.3.1-1 Function 1 requires two Manual Reactor Trip channels to be OPERABLE. ITS 3.3.1 ACTION B provides compensatory actions to take with one Manual Reactor Trip channel inoperable and requires restoration of the channel to OPERABLE status within 48 hours or to be in MODE 3 within 54 hours. This changes the CTS by requiring two channels of the Manual Reactor Trip Functional Unit to be OPERABLE instead of one channel and by adding a specific ACTION to take when one of two required channels is inoperable.	3.3.1 ACTION B, Table 3.3.1-1 Function 1 Required Channels	3.5.c, Table 3.5-2 Functional Unit 1

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 M02	CTS 3.5.c states, in part, that when the number of channels of a subsystem fall below the limits given in Table TS 3.5-2 Column 3 operation shall be limited according to the requirement shown in Column 6 as soon as practicable. CTS Table TS 3.5-2 Functional Unit 2 (Nuclear Flux Power Range) Column 3 requires three Nuclear Flux Power Range High setting channels to be OPERABLE. Thus while there are four Nuclear Flux Power Range channels for each of the listed functions, the CTS allows one of the channels, for each function, to be inoperable for an indefinite amount of time; no actions are required when one of the four Nuclear Flux Power Range channels is inoperable. ITS LCO 3.3.1 requires the RPS instrumentation in Table 3.3.1-1 to be OPERABLE. ITS Table 3.3.1-1 Function 2.a requires four Power Range Neutron Flux – High channels to be OPERABLE. ITS 3.3.1 ACTION D provides compensatory actions to take with one Power Range Neutron Flux – High channel inoperable and requires placing the channel in trip within 72 hours and reducing THERMAL POWER to ≤ 75% RTP or placing the channel in trip within 72 hours and performing SR 3.2.4.2 when the Power Range Neutron Flux input to the QPTR is inoperable once per 12 hours or to be in MODE 3 within 78 hours. Additionally, ACTION D contains a Note that allows the inoperable channel to be bypassed for up to 12 hours for surveillance testing and setpoint adjustment of other channels. This changes the CTS by requiring four	3.3.1 ACTION D, Table 3.3.1-1 Function 2.a Required Channels	3.5.c, Table 3.5-2 Functional Unit 2
3.3.1 M02	channels of the Power Range Neutron Flux – High Functional Unit to be OPERABLE instead of the three channels and by adding a specific ACTION to take when one of the four required channels are inoperable. See DOC L12 for discussion of ACTION Note.	3.3.1 ACTION D, Table 3.3.1-1 Function 2.a Required Channels	3.5.c, Table 3.5-2 Functional Unit 2

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 M03	CTS 3.5.c states, in part, that when the number of channels of a subsystem fall below the limits given in Table TS 3.5-2 Column 3 operation shall be limited according to the requirement shown in Column 6 as soon as practicable. Table TS 3.5-2 Functional Unit 2 (Nuclear Flux Power Range), Column 3 requires three Nuclear Flux Power Range Low setting channels, three Nuclear Flux Power Range Positive rate channels, and three Nuclear Flux Power Range Negative rate channels to be OPERABLE. Thus while there are four Nuclear Flux Power Range channels in the KPS design, the CTS allows one of the Nuclear Flux Power Range to be inoperable for an indefinite amount of time; no actions are required when one of the four Nuclear Flux Power Range channels is inoperable. Table TS 3.5-2 Functional Unit 5 (Overtemperature ΔT), Column 3 requires three Overtemperature ΔT channels to be OPERABLE. Thus while there are four Overtemperature ΔT channels in the KPS design, the CTS allows one of the Overtemperature ΔT channels to be inoperable for an indefinite amount of time; no actions are required for when one of the four Overtemperature ΔT channels is inoperable. Table TS 3.5-2 Functional Unit 6 (Overpower ΔT), Column 3 requires three Overpower ΔT channels to be OPERABLE. Thus while there are four Overpower ΔT channels in the KPS design, the CTS allows one of the Overpower ΔT channels to be inoperable for an indefinite period of time; no actions are required for when one of the four Overpower ΔT channels is inoperable. Table TS 3.5-2 Functional Unit 8 (High Pressurizer Pressure), Column 3 requires two High Pressurizer Pressure channels to be OPERABLE. Thus while there are three High Pressurizer Pressure channels in the KPS design, the CTS allows one of the High Pressurizer Pressure channels to be inoperable for an indefinite period of time; no actions are required for when one of the three High Pressurizer Pressure channels is inoperable. Table TS 3.5-2 Functional Unit 12 (Lo-Lo Steam Generator Water Level), Column 3 requires two Lo-Lo Steam Generator Water Level channels per loop to be OPERABLE. Thus while there are three Lo-Lo Steam Generator Water Level channels per loop in the KPS design, the CTS allows one of the Lo-Lo Steam Generator Water Level channels per loop to be inoperable for an indefinite period of time; no actions are required for when one of the three Lo-Lo Steam Generator Water Level channels per loop is inoperable. Table TS 3.5-2 Functional Unit 16 (Steam Flow/Feedwater Flow Mismatch), Column 3 requires one Steam Flow/Feedwater Flow Mismatch channel	3.3.1 ACTION E Table 3.3.1-1 Functions 2.b, 3.a, 3.b, 6, 8.a, 14, and 15 Required Channels	3.5.c Table TS 3.5-2 Functional Unit 2, Functional Unit 5, Functional Unit 6, Functional Unit 8, Functional Unit 12, Functional Unit 16

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 M03 (Continued)	to be OPERABLE. Thus while there are two Steam Flow/Feedwater Flow Mismatch channels in the KPS design, the CTS allows one Steam Flow/Feedwater Flow Mismatch channel to be inoperable for an indefinite amount of time; no actions are required when one Steam Flow/Feedwater Flow Mismatch channel is inoperable. ITS LCO 3.3.1 requires the RPS Instrumentation in Table 3.3.1-1 to be OPERABLE. ITS Table 3.3.1-1 Function 2.b requires four Power Range Neutron Flux – Low channels to be OPERABLE. ITS Table 3.3.1-1 Function 3.a requires four Power Range Neutron Flux – High Positive Rate channels to be OPERABLE. ITS Table 3.3.1-1 Function 3.b requires four Power Range Neutron Flux – High Negative Rate channels to be OPERABLE. ITS Table 3.3.1-1 Function 6 requires four Overtemperature ΔT channels to be OPERABLE. ITS Table 3.3.1-1 Function 7 requires four Overpower ΔT channels to be OPERABLE. ITS Table 3.3.1-1 Function 8.a requires three Pressurizer Pressure – High channels to be OPERABLE. ITS Table 3.3.1-1 Function 14 requires three Steam Generator (SG) Water Level – Low Low channels per steam generator to be OPERABLE. ITS Table 3.3.1-1 Function 15 requires two SG Water Level- Low – Coincident with Steam Flow/Feedwater Flow Mismatch channels per steam generator to be OPERABLE. ITS 3.3.1 ACTION E provides compensatory actions to take when one Power Range Neutron Flux – Low channel, one Power Range Neutron Flux – High Positive Rate channel, one Power Range Neutron Flux – High Negative Rate channel, one Overtemperature ΔT channel, one Overpower ΔT channel, Pressurizer Pressure – High channel, one Steam Generator (SG) Water Level – Low Low channel, or one SG Water Level – Low – Coincident with Steam Flow/Feedwater Flow Mismatch channel is inoperable and requires placing the inoperable channel in trip within 72 hours or to be in MODE 3 within 78 hours. Additionally, ACTION E contains a Note which allows the inoperable channel to be bypassed for up to 12 hours for Surveillance testing of other channels. This changes the CTS by requiring additional channels for Nuclear Flux Power Range Low setting channel, Nuclear Flux Power Range Positive rate channel, Nuclear Flux Power Range Negative rate channel, Overtemperature ΔT channel, Overpower ΔT channel, High Pressurizer Pressure channel, Lo-Lo Steam Generator Water Level channels per loop, and Steam Flow/Feedwater Flow Mismatch channel to be OPERABLE. See DOC L12 for discussion of ACTION Note.	3.3.1 ACTION E Table 3.3.1-1 Functions 2.b, 3.a, 3.b, 6, 8.a, 14, and 15 Required Channels	3.5.c Table TS 3.5-2 Functional Unit 2, Functional Unit 5, Functional Unit 6, Functional Unit 8, Functional Unit 12, Functional Unit 16

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 M04	CTS 3.5.c states, in part, that when the number of channels of a subsystem fall below the limits given in Table TS 3.5-2 Column 3 operation shall be limited according to the requirement shown in Column 6 as soon as practicable. Table TS 3.5-2 Functional Unit 3 (Nuclear Flux Intermediate Range), requires one Nuclear Flux Intermediate Range channel to be OPERABLE. Thus while there are two Nuclear Flux Intermediate Range channels in the KPS design, the CTS allows for one of the Nuclear Flux Intermediate Range channels to be inoperable for an indefinite amount of time; no actions are required when one of the two Nuclear Flux Intermediate Range channels is inoperable. ITS LCO 3.3.1 requires the RPS Instrumentation in Table 3.3.1-1 to be OPERABLE. ITS Table 3.3.1-1 Function 4 requires two Intermediate Range Neutron Flux channels to be OPERABLE. ITS 3.3.1 ACTION F provides compensatory actions to take when one Intermediate Range Neutron Flux channel is inoperable and requires reducing THERMAL POWER to < P-6 within 24 hours or increasing THERMAL POWER to > P-10 with 24 hours. This changes the CTS by requiring two channels of the Intermediate Range Neutron Flux Functional Unit to be OPERABLE instead of the one channel and by adding a specific ACTION to take when one of the two required channels is inoperable.	3.3.1 ACTION F, Table 3.3.1-1 Function 4 Required Channels	3.5.c, Table TS 3.5-2 Functional Unit 3

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 M05	CTS 3.5.c states, in part, that when the number of channels of a subsystem fall below the limits given in Table TS 3.5-2 Column 3 operation shall be limited according to the requirement shown in Column 6 as soon as practicable. Table TS 3.5-2 Functional Unit 4 (Nuclear Flux Source Range), Column 3 requires one Nuclear Flux Source Range channel to be OPERABLE. Thus while there are two Nuclear Flux Source Range channels in the KPS design, the CTS allows for one of the Nuclear Flux Source Range channels to be inoperable for an indefinite amount of time; no actions are required when one of the two Nuclear Flux Source Range channels is inoperable. ITS LCO 3.3.1 requires the RPS instrumentation in Table 3.3.1-1 to be OPERABLE. ITS Table 3.3.1-1 Function 5 requires two Source Range Neutron Flux channels to be OPERABLE. ITS 3.3.1 ACTION H provides compensatory actions to take with one Nuclear Flux Source Range channel inoperable and requires immediate suspension of operations involving positive reactivity additions. Limited plant cooldown or boron dilution is allowed provided the change is accounted for in the calculated SDM. This changes the CTS by requiring two channels of the Nuclear Flux Source Range Functional Unit to be OPERABLE instead of the one channel currently required by CTS and by adding a specific ACTION to take when one of the two required channels is inoperable.	3.3.1 ACTION H Table 3.3.1-1 Function 5 Required Channels	3.5.c, Table TS 3.5-2 Functional Unit 4
3.3.1 M06	CTS 3.5.c states, in part, that when the number of channels of a subsystem fall below the limits given in Table TS 3.5-2 Column 3 operation shall be limited according to the requirement shown in Column 6 as soon as practicable. Table TS 3.5-2 Functional Unit 7 (Low Pressurizer Pressure), Column 3 requires three Low Pressurizer Pressure channels to be OPERABLE. Thus while there are four Low Pressurizer Pressure channels in the KPS design, the CTS allows one of the Low Pressurizer Pressure channels to be inoperable for an indefinite amount of time; no actions are required when one of the four Low Pressurizer Pressure channels are inoperable. Table 3.5-2 Functional Unit 9 (Pressurizer High Water Level), Column 3 requires two Pressurizer High Water Level channels to be OPERABLE. Thus while there are three Pressurizer High Water Level channels in the KPS design, the CTS allow one of the Pressurizer High Water Level channels to be inoperable for an indefinite period of time; no actions are required when one of the three Pressurizer High Water Level channels are inoperable. Table 3.5-2 Functional Unit 10 (Low Flow in One Loop and Low Flow in Both Loops), Column 3 requires two Low Flow	3.3.1 ACTION K Table 3.3.1-1 Functions 8.a, 9, 10, 12, and 13 Required Channels	3.5.c, Table TS 3.5-2 Functional Unit 7, Functional Unit 9, Functional Unit 10, Functional Unit 13, Functional Unit 14

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 M06 (Continued)	channels to be OPERABLE. Thus while there are three Low Flow channels per loop in the KPS design, the CTS allows one Low Flow channel in any loop to be inoperable for an indefinite period of time; no action required when one channel in any Low Flow loop channel is inoperable. Table 3.5-2 Functional Unit 13 (Undervoltage 4-kV), Column 3 requires one Undervoltage 4-kV channel per bus to be OPERABLE. Thus while there are two Undervoltage 4-kV channels per bus in the KPS design, the CTS allows one Undervoltage 4-kV channel per bus to be inoperable for an indefinite period of time; no action required when one Undervoltage 4-kV channel per bus is inoperable. Table 3.5-2 Functional Unit 14 (Underfrequency 4-kV), Column 3 requires one Underfrequency 4-kV channel per bus to be OPERABLE. Thus while there are two Underfrequency 4-kV channels per bus in the KPS design, the CTS design allows one Underfrequency 4-kV channel per bus to be inoperable for an indefinite period of time; no actionrequired when one Underfrequency 4-kV channel per bus is inoperable. ITS LCO 3.3.1 requires the RPS instrumentation in Table 3.3.1-1 to be OPERABLE. ITS Table 3.3.1-1 Function 8.a requires four Pressurizer Pressure – Low channels to be OPERABLE. ITS Table 3.3.1-1 Function 9 requires three Pressurizer Water Level – High channels to be OPERABLE. ITS Table 3.3.1-1 Function 10 requires three Reactor Coolant Flow – Low channels per loop to be OPERABLE. ITS Table 3.3.1-1 Function 12 requires two Undervoltage RCPs per bus to be OPERABLE. ITS 3.3.1-1 Function 13 requires two Underfrequency RCPs per loop to be OPERABLE. ITS 3.3.1 ACTION K provides compensatory actions to take with one Pressurizer Pressure – Low channel inoperable, one Pressurizer Water Level – High channel inoperable, one Reactor Coolant Flow – Low channel inoperable, one Undervoltage RCP channel inoperable, or one Underfrequency RCP channel inoperable and requires placing the channel in trip within 72 hours or reducing THERMAL POWER to < P-7 within 78 hours. This changes the CTS by requiring four channels of the Pressurizer Pressure – Low instead of the three channels, three Pressurizer Water Level – High channels instead of the two channels, three Reactor Coolant Flow – Low channels per loop instead of the two channels per loop, two Undervoltage RCPs channels per bus instead of the one channel per bus, and two Underfrequency RCPs channels per bus instead of one channel per bus.	3.3.1 ACTION K Table 3.3.1-1 Functions 8.a, 9, 10, 12, and 13 Required Channels	3.5.c, Table TS 3.5-2 Functional Unit 7, Functional Unit 9, Functional Unit 10, Functional Unit 13, Functional Unit 14

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 M07	CTS 3.5.c states, in part, that when the number of channels of a subsystem fall below the limits given in Table TS 3.5-2 Column 3 operation shall be limited according to the requirement shown in Column 6 as soon as practicable. Table TS 3.5-2 Functional Unit 4 (Nuclear Flux Source Range), Column 3 requires one Nuclear Flux Source Range channel to be OPERABLE. If both of the Nuclear Flux Source Range channels are inoperable, then Table TS 3.5-2 Functional Unit 4 Column 6 requires maintaining HOT SHUTDOWN. Since there is no required action to take when there are two Nuclear Flux Source Range channels, CTS 3.0.c must be entered. CTS 3.0.c requires action to be initiated within 1 hour and to be in HOT STANDBY (equivalent to ITS MODE 2) in the following 6 hours and to be in HOT SHUTDOWN (equivalent to ITS MODE 3) in the next 6 hours. ITS LCO 3.3.1 requires the RPS instrumentation in Table 3.3.1-1 to be OPERABLE. ITS Table 3.3.1-1 Function 5 requires two Source Range Neutron Flux channels to be OPERABLE in MODE 2 when below the P-6 (Intermediate Range Neutron Flux) interlock. ITS 3.3.1 ACTION I provides actions for two inoperable Source Range Neutron Flux channels and requires the reactor trip breakers (RTBs) to be opened immediately. This changes the CTS by requiring the RTBs to be open immediately if both Source Range Neutron Flux channels become inoperable, in lieu of performing a controlled shutdown to HOT SHUTDOWN in 13 hours.	3.3.1 ACTION I, Table 3.3.1-1 Function 5 Required Channels	3.5.c, Table TS 3.5-2 Functional Unit 4
3.3.1 M08	CTS 3.5.c states, in part, that when the number of channels of a subsystem fall below the limits given in Table TS 3.5-2 Column 3 operation shall be limited according to the requirement shown in Column 6 as soon as practicable. Table TS 3.5-2 Functional Unit 17 (RTB (Independently Test Shunt and Undervoltage Attachments)), Column 3 requires two Independently Test Shunt and Undervoltage Attachments per RTB to be OPERABLE. If one Independently Test Shunt and Undervoltage Attachments per RTB is inoperable, then Table 3.5-2 Column 6 requires maintaining HOT SHUTDOWN and opening of the RTBs after 72 hours. ITS Table 3.3.1-1 Function 18 requires two Reactor Trip Breaker Undervoltage and Shunt Trip Mechanisms per RTB to be OPERABLE. ITS 3.3.1 ACTION R provides compensatory actions to take with one RTB Reactor Trip Breaker Undervoltage and Shunt Trip Mechanisms per RTB inoperable and requires restoration of the inoperable trip mechanism to OPERABLE status within 48 hours or to be in MODE 3 within 54 hours. This changes the CTS by requiring entrance into MODE 3 within 54 hours instead of the 72 hours in the CTS.	3.3.1 ACTION R, Table 3.3.1-1 Function 18 Required Channels	3.5.c Table 3.5-2 Functional Unit 17

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 M09	CTS 3.5.c states, in part, that when the number of channels of a subsystem fall below the limits given in Table TS 3.5-2 Column 3 operation shall be limited according to the requirement shown in Column 6 as soon as practicable. Table TS 3.5-2 Functional Unit 1 (Manual Reactor Trip) Column 6 requires maintaining HOT SHUTDOWN. Table TS 3.5-2 Functional Unit 17 (Reactor Trip Breakers and Independently Test Shunt and Undervoltage Trip Attachments) Column 6 requires, in part, maintaining HOT SHUTDOWN. Thus, the applicability for these Functional Units is determined to be HOT STANDBY and OPERATING. ITS LCO 3.3.1 requires the RPS instrumentation in Table 3.3.1-1 to be OPERABLE. ITS Table 3.3.1-1 Function 1 specifies the Applicability of the Manual Reactor Trip as MODES 1 and 2 (equivalent to CTS OPERATING and HOT STANDBY, respectively); and MODES 3, 4, and 5 (equivalent to CTS HOT SHUTDOWN, INTERMEDIATE SHUTDOWN and COLD SHUTDOWN, respectively) when the Rod Control System is capable of rod withdrawal or when one or more rods are not fully inserted. ITS Table 3.3.1-1 Function 17 specifies the Applicability of the Reactor Trip Breakers (RTBs) trains to be MODES 3, 4, and 5 when the Rod Control System is capable of rod withdrawal or when one or more rods are not fully inserted, in addition to MODES 1 and 2. ITS Table 3.3.1-1 Function 18 requires the Applicability of the Reactor Trip Breaker Undervoltage and Shunt Trip Mechanisms to be MODES 3, 4, and 5 when the Rod Control System is capable of rod withdrawal or when one or more rods are not fully inserted, in addition to MODES 1 and 2. Commensurate with the addition of the new MODES of Applicability, ACTION C was added to address when there is one channel or train inoperable in MODES 3, 4, and 5 when the Rod Control System is capable of rod withdrawal or when one or more rods are not fully inserted. ACTION C requires that with one channel or train inoperable, to either restore the channel or train to OPERABLE status within 48 hours or to initiate action to fully insert all rods within 48 hours and to place the Rod Control System in a condition incapable of rod withdrawal within 49 hours. Additionally, commensurate with the addition of the new MODES of Applicability, new Surveillance Requirements are being added. ITS SR 3.3.1.14 has been added for Function 1 to perform a TADOT every 18 months, but is modified by a Note that states that the verification of the setpoint is not required. ITS SR 3.3.1.4 has been added for Function 17 and 18 to perform a TADOT every 31 days, but is modified by a Note, which states that	SR 3.3.1.4, SR 3.3.1.14, Table 3.3.1-1 Functions 1, 17, and 18 Applicability, ACTION C	3.5.c Table TS 3.5-2 Functional Units 1 and 17

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 M09 (Continued)	the Surveillance must be performed on the reactor trip bypass breaker prior to placing the bypass breaker in service. This changes the CTS by requiring the Manual Reactor Trip channels and the Reactor Trip Breakers (RTBs) trains to be OPERABLE in MODES 3, 4, and 5 when the Rod Control System is capable of rod withdrawal or when one or more rods are not fully inserted. Furthermore, this change adds an ACTION to take when the Manual Reactor Trip channels and the Reactor Trip Breakers (RTBs) trains are inoperable in MODES 3, 4, and 5 when the Rod Control System is capable of rod withdrawal or when one or more rods are not fully inserted. It also adds additional Surveillance Requirements for the new MODE of Applicability.	SR 3.3.1.4, SR 3.3.1.14, Table 3.3.1-1 Functions 1, 17, and 18 Applicability, ACTION C	3.5.c Table TS 3.5-2 Functional Units 1 and 17
3.3.1 M10	CTS 3.5.c states, in part, that when the number of channels of a subsystem fall below the limits given in Table TS 3.5-2 Column 3 operation shall be limited according to the requirement shown in Column 6 as soon as practicable. Table TS 3.5-2 Functional Unit 4 (Nuclear Flux Source Range) Column 6 requires maintaining HOT SHUTDOWN. ITS LCO 3.3.1 requires the RPS instrumentation in Table 3.3.1-1 to be OPERABLE. ITS Table 3.3.1-1 Function 5 specifies the Applicability of the Source Range Neutron Flux to be MODE 2 below the P6 (Intermediate Range Neutron Flux) interlocks: and MODES 3, 4, and 5 (equivalent to CTS HOT SHUTDOWN, INTERMEDIATE SHUTDOWN and COLD SHUTDOWN, respectively) when the Rod Control System is capable of rod withdrawal or when one or more rods are not fully inserted. Commensurate with the addition of the new MODES of Applicability, ACTION J was added to address when there is one Source Range Neutron Flux channel inoperable in MODES 3, 4, and 5 when the Rod Control System is capable of rod withdrawal or when one or more rods are not fully inserted. ACTION J requires either restoration of the channel to OPERABLE status within 48 hours or initiation of action to fully insert all rods within 48 hours and placing the Rod Control System in a condition incapable of rod withdrawal within 49 hours. Additionally, commensurate with the addition of the new MODES of Applicability, new Surveillance Requirements are being added. ITS SR 3.3.1.1 is being added to perform a CHANNEL CHECK every 12 hours. ITS SR 3.3.1.7 is being added to perform a COT every 184 days, but is modified by a Note that states that it is not required to be performed for the source range instrumentation until 4 hours after entering MODE 3 from MODE 2. ITS SR 3.3.1.11 is being added to perform a	3.3.1 ACTION J, SR 3.3.1.7, SR 3.3.1.11	3.5.c Table TS 3.5-2 Functional Unit 4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 M10 (Continued)	CHANNEL CALIBRATION every 18 months, but excludes the neutron detectors from the CHANNEL CALIBRATION. This changes the CTS by requiring the Source Range Neutron Flux channels to OPERABLE in MODES 3, 4, and 5 when the Rod Control System is capable of rod withdrawal or when one or more rods are not fully inserted. Furthermore, this change adds the Applicability of MODES 3, 4, and 5 when the Rod Control System is capable of rod withdrawal or when one or more rods are not fully inserted and adds an ACTION to take when the Source Range Neutron Flux channels are inoperable in these MODES. It also adds additional Surveillance Requirements for the new MODES of Applicability. See DOC A04 for the justification of the MODE 2 below the P6 (Intermediate Range Neutron Flux) interlocks Applicability change.	3.3.1 ACTION J, SR 3.3.1.7, SR 3.3.1.11	3.5.c Table TS 3.5-2 Functional Unit 4
3.3.1 M11	ITS Table 3.3.1-1 Functions 2.a (Power Range Neutron Flux – High), 2.b (Power Range Neutron Flux – Low), 3.a (Power Range Neutron Flux Rate – High Positive Rate), 3.b (Power Range Neutron Flux Rate – High Negative Rate), 4 (Intermediate Range Neutron Flux), and 5 (Source Range Neutron Flux) require performance of a CHANNEL CALIBRATION in accordance with the Setpoint Control Program (ITS SR 3.3.1.11) every 18 months. This CHANNEL CALIBRATION is modified by a Note, which states that the Neutron detectors are excluded from the CHANNEL CALIBRATION. CTS Table TS 4.1-1 does not contain a requirement for a CHANNEL CALIBRATION of the Nuclear Power Range, Nuclear Intermediate Range and Nuclear Source Range instrumentation. This changes the CTS by requiring a CHANNEL CALIBRATION of the Nuclear Power Range, Nuclear Intermediate Range and Nuclear Source Range instrumentation every 18 months	SR 3.3.1.11	Table TS 4.1-1

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 M12	CTS Table 4.1-1 Channel Description 26 requires a monthly test of the Protection System Logic Channel. However, the CTS does not specify an Applicability or Actions to take if these channels are inoperable or the number of Required Channels. However, all RPS Protective System Logic Channels are required to be OPERABLE when the associated RPS channels are required. Currently, this is MODES 1 and 2 as described in DOC A12. ITS Table 3.3.1-1 Function 19 provides the appropriate MODES 1 and 2 requirements. ITS Table 3.3.1-1 Function 19 also requires two trains of the Automatic Trip Logic to be OPERABLE in MODES 3, 4, and 5 with the Rod Control System capable of rod withdrawal or one or more rods not fully inserted. If one train of the Automatic Trip Logic is inoperable in MODES 3, 4, or 5 with the Rod Control System capable of rod withdrawal or one or more rods not fully inserted, then ITS 3.3.1 ACTION C requires either restoration of the train to OPERABLE status within 48 hours or to initiate action to fully insert all rods within 48 hours and to place the Rod control System in a condition incapable of rod withdrawal within 49 hours. This changes the CTS by adding new requirements for MODES 3, 4, and 5, including a new ACTION.	3.3.1 ACTION C Table 3.3.1-1 Function 19 Required Channels	Table TS 4.1-1 Channel Description 26
3.3.1 M13	CTS Table TS 3.5-2 Functional Unit 17 (Reactor Trip Breaker (RTB)), contains a Note that states that the RTBs may be bypassed for up to 8 hours for surveillance testing and maintenance. ITS 3.3.1 ACTION O, which provides the ACTIONS when one RTB train is inoperable, allows one train of the RTB to be bypassed for up to 4 hours for surveillance testing, provided the other train is OPERABLE. This changes the CTS by allowing only 4 hours for testing instead of 8 hours that is allowed in the CTS. See DOC L02 for changes related to the maintenance allowance if the CTS Note.	3.3.1 ACTION O	Table TS 3.5-2 Functional Unit 17

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 M14	CTS Table TS 3.5-2 lists the Permissive/Interlock but does not specify any testing requirements. CTS Table TS 4.1-1 and TS 4.1-3 list the testing requirements for instrumentation, but do not list any specific testing requirements for the Permissive/Interlocks. ITS Table 3.3.1-1 requires performance of CHANNEL CALIBRATION (ITS SR 3.3.1.11) for the Intermediate Range Neutron Flux, P-6 (Function 16.a); the Power Range Neutron Flux, P-8 (Function 16.c); and the Power Range Neutron Flux, P-10 (Function 16.d). ITS Table 3.3.1-1 requires performance of a COT for the Intermediate Range Neutron Flux, P-6 (Function 16.a) every 18 months. Additionally, ITS Table 3.3.1-1 requires performance of an ACTUATION LOGIC TEST (ITS SR 3.3.1.5) for the Power Range Neutron Flux, P-7 (Function 16.b). ITS SR 3.3.1.5 requires performance of an ACTUATION LOGIC TEST (as modified by the Note to the SR) every 92 days on a STAGGERED TEST BASIS. ITS SR 3.3.1.11 requires performance of CHANNEL CALIBRATION in accordance with the Setpoint Control Program every 18 months. This surveillance is modified by a Note which excludes the neutron detectors from the CHANNEL CALIBRATION. ITS SR 3.3.1.13 requires performance of a COT every 18 months. This changes the CTS by requiring performance of a COT, CHANNEL CALIBRATION and an ACTUATION LOGIC TEST on the Permissive/Interlocks that was not required in the CTS.	SR 3.3..1.5, SR 3.3.1.11	Table TS 3.5-2, Table TS 4.1-1, Table TS 4.1-3
3.3.1 M15	The CTS has no specific requirements for the Turbine Trip - Fluid Oil Pressure Low and Turbine Trip - Turbine Stop Valve Closure reactor trips, except for a line item in CTS 2.3.a.7, which only specifies that there is a turbine trip. ITS Table 3.3.1-1 provides the requirements for these two trips (Functions 20.a and 20.b), including the number of required channels, the Applicability, an ACTION to take if a channel is inoperable (ACTION S), and Surveillance Requirements (ITS SR 3.3.1.10 and SR 3.3.1.15). This changes the CTS by adding specific requirements for the Turbine Trip - Fluid Oil Pressure Low and Turbine trip - Turbine Stop Valve Closure reactor trip Functions.	Table 3.3.1-1 Functions 20.a and 20.b, ACTION S, SR 3.3.1.10, SR 3.3.1.15	2.3.a.7

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 M01	CTS 3.5.c states, in part, that when the number of channels of a subsystem fall below the limits given in Table TS 3.5-2 Column 3 operation shall be limited according to the requirement shown in Column 6 as soon as practicable. Table TS 3.5-2 Functional Unit 13 (Undervoltage 4-kV), Column 3 requires one Undervoltage 4-kV channel per bus to be OPERABLE. Thus while there are two Undervoltage 4-kV channels per bus in the KPS design, the CTS allows one Undervoltage 4-kV channel per bus to be inoperable for an indefinite period of time; no action required when one Undervoltage 4-kV channel per bus is inoperable. ITS LCO 3.3.2 requires the ESFAS instrumentation in Table 3.3.2-1 to be OPERABLE. ITS Table 3.3.2-1 Function 6.d requires two Undervoltage Reactor Coolant Pump channels per bus to be OPERABLE. ITS 3.3.2 ACTION H provides compensatory actions to take with one Undervoltage Reactor Coolant Pump channel inoperable and requires placing the channel in trip within 72 hours or to be in MODE 3 within 78 hours. Additionally, a Note has been added to ACTION H which states that the inoperable channel may be bypassed for up to 12 hours for surveillance testing of other channels. This changes the CTS by requiring two Undervoltage Reactor Coolant Pump channels per bus to be OPERABLE instead of one channel per bus and by adding a specific ACTION to take when one less than the required channels is inoperable. See DOC L08 for discussion on the ACTION Note.	3.3.2 ACTION H, Table 3.3.2-1 Function 6.d Required Channel	3.5.c, Table 3.5-2 Functional Unit 12

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 M02	CTS 3.5.c states, in part, that when the number of channels of a subsystem fall below the limits given in Tables TS 3.5-3 and TS 3.5-4 Column 3 operation shall be limited according to the requirement shown in Column 6 as soon as practicable. Table TS 3.5-3 Functional Unit 1.a (Safety Injection - Manual), Column 3 requires one Safety Injection - Manual channel to be OPERABLE. Thus while there are two Safety Injection - Manual channels in the KPS design, the CTS allows one Safety Injection - Manual channel to be inoperable for an indefinite period of time; no action required when one Safety Injection - Manual channel is inoperable. Table TS 3.5-4 Functional Unit 1.b (Containment Isolation - Manual), Column 3 requires one Containment Isolation - Manual channel to be OPERABLE. Thus while there are two Containment Isolation - Manual channels in the KPS design, the CTS allows one Containment Isolation - Manual channel to be inoperable for an indefinite period of time; no action required when one Containment Isolation - Manual channel is inoperable. ITS LCO 3.3.2 requires the ESFAS instrumentation in Table 3.3.2-1 to be OPERABLE. ITS Table 3.3.2-1 Function 1.a requires two Safety Injection - Manual Initiation channels to be OPERABLE. ITS Table 3.3.2-1 Function 3.a requires two Containment Isolation - Manual Initiation channels to be OPERABLE. ITS 3.3.2 ACTION B provides compensatory actions to take with one Safety Injection - Manual Initiation channel inoperable or one Containment Isolation – Manual Initiation channel inoperable and requires restoring the channel to OPERABLE status in 48 hours or be in MODE 3 within 54 hours and be in MODE 5 within 84 hours. This changes the CTS by requiring two Safety Injection - Manual channels to be OPERABLE instead of one channel and two Containment Isolation – Manual Initiation channels to be OPERABLE instead of one channel and by adding a specific ACTION to take when one less than the required channels is inoperable.	3.3.2 ACTION B, Table 3.3.2-1 Function 3.a Required Channels	3.5.c, Table TS 3.5-3 Functional Unit 1.a, Table TS 3.5-4 Functional Unit 1.b

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 M03	CTS 3.5.c states, in part, that when the number of channels of a subsystem fall below the limits given in Tables TS 3.5-3 and TS 3.5-4 Column 3 operation shall be limited according to the requirement shown in Column 6 as soon as practicable. Table TS 3.5-3 Functional Unit 1.b (Safety Injection – High Containment Pressure) Column 3 requires two Safety Injection – High Containment Pressure channels to be OPERABLE. Thus while there are three Safety Injection - High Containment Pressure channels in the KPS design, the CTS allows one Safety Injection - High Containment Pressure channel to be inoperable for an indefinite period of time; no action required when one Safety Injection - High Containment Pressure channel is inoperable. Table TS 3.5-3 Functional Unit 1.c (Safety Injection – Low Steam Pressure/Line) Column 3 requires two Safety Injection – Low Steam Pressure/Line channels to be OPERABLE. Thus while there are three Safety Injection - Low Steam Pressure/Line channels in the KPS design, the CTS allows one Safety Injection - Low Steam Pressure/Line channel to be inoperable for an indefinite period of time; no action required when one Safety Injection - Low Steam Pressure/Line channel is inoperable. CTS Table TS 3.5-3 Functional Unit 1.d (Safety Injection – Pressurizer Low Pressure) Column 3 requires two Safety Injection – Pressurizer Low Pressure channels to be OPERABLE. Thus while there are three Safety Injection - Pressurizer Low Pressure channels in the KPS design, the CTS allows one Safety Injection - Pressurizer Low Pressure channel to be inoperable for an indefinite period of time; no action required when one Safety Injection - Pressurizer Low Pressure channel is inoperable. CTS Table TS 3.5-3 Functional Unit 4.a (Motor-Driven Auxiliary Feedwater Pumps – Either Steam Generator Lo-Lo Level) Column 3 requires two Steam Generator Lo-Lo Level channels per loop to be OPERABLE. Thus while there are three Steam Generator Lo-Lo Level channels per loop in the KPS design, the CTS allows one Steam Generator Lo-Lo Level channel per loop to be inoperable for an indefinite period of time; no action required when one Steam Generator Lo-Lo Level channel per loop is inoperable. CTS Table TS 3.5-3 Functional Unit 5.a (Turbine-Driven Auxiliary Feedwater Pumps – Both Steam Generator Lo-Lo Level) Column 3 requires two Steam Generator Lo-Lo Level channels per loop to be OPERABLE. Thus while there are three Steam Generator Lo-Lo Level channels per loop in the KPS design, the CTS allows one Steam Generator Lo-Lo Level channel per loop to be inoperable for an indefinite period of time; no action required when one Steam Generator Lo-Lo Level channel per loop	3.3.2 ACITON D, Table 3.3.2-1 Functions 1.c, 1.d, 1.e, 4.c, 4.d, 4.e, 5.b, and 6.b Required Channels	Table TS 3.5-3 Functional Unit 1.a, Functional Unit 1.b, Functional Unit 1.c, Table TS 3.5-3 Functional Unit 1.d, Functional Unit 4.a, Functional Unit 5.a, Table TS 3.5-4 Functional Unit 2.a, Functional Unit 2.b, Functional Unit 2.c, Functional Unit 4.a

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 M03 (Continued)	is inoperable. Table TS 3.5-4 Functional Unit 2.c (Steam Line Isolation – Hi-Hi Containment Pressure) Column 3 requires two Steam Line Isolation – Hi-Hi Containment Pressure channels to be OPERABLE. Thus while there are three Steam Line Isolation – Hi-Hi Containment Pressure channels in the KPS design, the CTS allows one Steam Line Isolation – Hi-Hi Containment Pressure channel to be inoperable for an indefinite period of time; no action required when one Steam Line Isolation – Hi-Hi Containment Pressure channel is inoperable. CTS Table TS 3.5-4 Functional Unit 2.b (Steam Line Isolation – Hi Steam Flow and 2 of 4 Lo-Lo Tavg with Safety Injection) Column 3 requires one Steam Line Isolation – Hi Steam Flow and 2 of 4 Lo-Lo Tavg with Safety Injection channel to be OPERABLE. Thus while there are two Steam Line Isolation – Hi Steam Flow and 2 of 4 Lo-Lo Tavg with Safety Injection channels per loop in the KPS design, the CTS allows one Steam Line Isolation – Hi Steam Flow and 2 of 4 Lo-Lo Tavg with Safety Injection channel per loop to be inoperable for an indefinite period of time; no action required when one Steam Line Isolation – Hi Steam Flow and 2 of 4 Lo-Lo Tavg with Safety injection channel per loop is inoperable. CTS Table TS 3.5-4 Functional Unit 2.a (Steam Line Isolation – Hi-Hi Steam Flow with Safety Injection) Column 3 requires one Steam Line Isolation – Hi-Hi Steam Flow with Safety Injection channel to be OPERABLE. Thus while there are two Steam Line Isolation – Hi-Hi Steam Flow with Safety Injection channels per loop in the KPS design, the CTS allows one Steam Line Isolation – Hi-Hi Steam Flow with Safety Injection channel per loop to be inoperable for an indefinite period of time; no action required when one Steam Line Isolation – Hi-Hi Steam Flow with Safety Injection channel per loop is inoperable. Table TS 3.5-4 Functional Unit 4.a (Main Feedwater Isolation – Hi-Hi Steam Generator Level) Column 3 requires two Main Feedwater Isolation – Hi-Hi Steam Generator Level channels to be OPERABLE. Thus while there are three Main Feedwater Isolation – Hi-Hi Steam Generator Level channels in the KPS design, the CTS allows one Main Feedwater Isolation – Hi-Hi Steam Generator Level channel to be inoperable for an indefinite period of time; no action required when one Main Feedwater Isolation – Hi-Hi Steam Generator Level channel is inoperable. ITS LCO 3.3.2 requires the ESFAS instrumentation in Table 3.3.2-1 to be OPERABLE. ITS Table 3.3.2-1 Function 1.c requires three Safety Injection – Containment Pressure-High channels to be OPERABLE. ITS Table 3.3.2-1 Function 1.d requires three	3.3.2 ACITON D, Table 3.3.2-1 Functions 1.c, 1.d, 1.e, 4.c, 4.d, 4.e, 5.b, and 6.b Required Channels	Table TS 3.5-3 Functional Unit 1.a, Functional Unit 1.b, Functional Unit 1.c, Table TS 3.5-3 Functional Unit 1.d, Functional Unit 4.a, Functional Unit 5.a, Table TS 3.5-4 Functional Unit 2.a, Functional Unit 2.b, Functional Unit 2.c, Functional Unit 4.a

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 M03 (Continued)	Safety Injection – Pressurizer Pressure-Low channels to be OPERABLE. ITS Table 3.3.2-1 Function 1.e requires three Safety Injection – Steam Line Pressure-Low channels per steam line to be OPERABLE. ITS Table 3.3.2-1 Function 6.b requires three Auxiliary Feedwater - Steam Generator Water Level-Low Low channels per steam generator to be OPERABLE. ITS Table 3.3.2-1 Function 4.c requires three Steam Line Isolation – Containment Pressure-High High channels to be OPERABLE. ITS Table 3.3.2-1 Function 4.d requires two channels per steam line of the Steam Line Isolation – High Steam Flow and two channels per loop of the Steam Line Isolation - Tavg Low-Low to be OPERABLE. ITS Table 3.3.2-1 Function 4.e requires two channels per steam line of the Steam Line Isolation – High High Steam Flow to be OPERABLE. ITS Table 3.3.2-1 Function 5.b requires three channels per steam generator of the Feedwater Isolation – Steam Generator Water Level-High High to be OPERABLE. ITS 3.3.2 ACTION D provides compensatory actions to take with one Safety Injection – Containment Pressure-High channel inoperable, one Safety Injection – Pressurizer Pressure-Low channel inoperable, one Safety Injection – Steam Line Pressure-Low channel inoperable, one Steam Generator Water Level – Low Low channel per steam generator inoperable, one Steam Line Isolation – Containment Pressure-High High channel inoperable, one Steam Line Isolation – High Steam Flow channel per steam line and one channel per loop of the Steam Line Isolation - Tavg Low-Low inoperable, one Steam Line Isolation – High High Steam Flow channel inoperable, or one Feedwater Isolation – Steam Generator Water Level-High High channel per steam generator inoperable and requires placing the channel in trip in 72 hours or to be in MODE 3 within 78 hours and be in MODE 4 within 84 hours. Additionally, a Note has been added to ACTION D which states that the inoperable channel may be bypassed for up to 12 hours for surveillance testing of other channels. This changes the CTS by requiring additional channels for Safety Injection – Containment Pressure -High, Safety Injection – Low Steam Line Pressure/Line, Safety Injection – Pressurizer Low Pressure, Auxiliary Feedwater – Steam Generator Water Level-Low Low, Steam Line Isolation – Containment Pressure-High High, Steam Line Isolation – High Steam Flow and Tavg Low-Low, Steam Line Isolation – High High Steam Flow, and Feedwater Isolation – Steam Generator Water Level-High High to be OPERABLE and by adding a specific ACTION to take when one less than the required channels is inoperable. See DOC L08 for discussion on the ACTION Note.	3.3.2 ACITON D, Table 3.3.2-1 Functions 1.c, 1.d, 1.e, 4.c, 4.d, 4.e, 5.b, and 6.b Required Channels	Table TS 3.5-3 Functional Unit 1.a, Functional Unit 1.b, Functional Unit 1.c, Table TS 3.5-3 Functional Unit 1.d, Functional Unit 4.a, Functional Unit 5.a, Table TS 3.5-4 Functional Unit 2.a, Functional Unit 2.b, Functional Unit 2.c, Functional Unit 4.a

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 M04	CTS 3.5.c states, in part, that when the number of channels of a subsystem fall below the limits given in Table TS 3.5-3 Column 3 operation shall be limited according to the requirement shown in Column 6 as soon as practicable. Table TS 3.5-3 Functional Unit 3.b (Hi-Hi Containment Pressure (Containment Spray)) Column 3 requires one channel per set to be OPERABLE. Thus while there are three sets of two channels of Hi-Hi Containment Pressure (Containment Spray) in the KPS design, the CTS allows one channel per set of Hi-Hi Containment Pressure (Containment Spray) to be inoperable for an indefinite period of time; no action required when one channel per set of Hi-Hi Containment Pressure (Containment Spray) is inoperable. ITS LCO 3.3.2 requires the ESFAS instrumentation in Table 3.3.2-1 to be OPERABLE. ITS Table 3.3.2-1 Function 2.c requires three sets of two channels of Containment Spray – Containment Pressure-High High to be OPERABLE. ITS 3.3.2 ACTION E provides compensatory actions to take with one Containment Pressure channel inoperable and requires placing the channel in trip in 72 hours or to be in MODE 3 within 78 hours and be in MODE 4 within 84 hours. Additionally, a Note has been added to ACTION E which states that one additional channel may be bypassed for up to 12 hours for surveillance testing of other channels. This changes the CTS by requiring three sets of two channels of Containment Spray – Containment Pressure-High High to be OPERABLE instead of one channel per set and by adding a specific ACTION to take when one less than the required channels is inoperable. See DOC L08 for discussion on the ACTION Note.	3.3.2 ACTION E, Table 3.3.2-1 Function 2.c Required Channels	Table TS 3.5-3 Functional Unit 3.b

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 M05	CTS 3.5.c states, in part, that when the number of channels of a subsystem fall below the limits given in Column 3 of Table TS 3.5-2 operation shall be limited according to the requirement shown in Column 6 as soon as practicable. If the conditions of Column 3 of CTS Table TS 3.5-2 cannot be met (i.e., less than the minimum number of OPERABLE channels), Column 6 requires that the unit be maintained in HOT SHUTDOWN (equivalent to ITS MODE 3) for Functional Unit 13. Since there is no time limit to attain HOT SHUTDOWN, KPS uses the time limit from CTS 3.0.c. CTS 3.0.c requires that within one hour action shall be initiated to place the unit in a MODE in which the Specification does not apply by placing it, as applicable, in at least HOT STANDBY within the next 6 hours and at least in HOT SHUTDOWN within the following 6 hours. In the ITS for Function 6.d, no ACTIONS are provided in ITS 3.3.2 when more than one channel or train is inoperable; therefore, entry into LCO 3.0.3 is required. LCO 3.0.3 requires that the unit be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in MODE 3 within 7 hours, in MODE 4 within 13 hours, and in MODE 5 within 37 hours. The ITS Applicability for Function 6.d is MODES 1 and 2. Therefore, placing the unit in MODE 3 will place the unit in a condition in which the LCO does not apply. This changes the CTS by requiring less time for the unit to reach MODE 3 in the ITS than is allowed to reach MODE 3 in the CTS.	Table 3.3.2-1 Function 6.d Applicability	3.5.c
3.3.2 M06	CTS 3.5.c states, in part, that when the number of channels of a subsystem fall below the limits given in Column 3 of Table TS 3.5-4 operation shall be limited according to the requirement shown in Column 6 as soon as practicable. If the conditions of Column 3 of CTS Table TS 3.5-4 cannot be met (i.e., less than the minimum number of OPERABLE channels), Column 6 requires that the unit be placed in HOT SHUTDOWN (equivalent to ITS MODE 3) for Functional Units 2.a, 2.b, and 2.c of Table TS 3.5-4. The HOT SHUTDOWN requirement in Column 6 contains a footnote, footnote (1) for Functional Units 2.a, 2.b, and 2.c of Table TS 3.5-4, which states if minimum conditions are not met within 24 hours (i.e., restoration of at least the minimum number of OPERABLE channels required in Column 3), steps shall be taken to place the plant in a COLD SHUTDOWN (equivalent to ITS MODE 5) condition. Since there are no time limits to attain HOT SHUTDOWN or COLD SHUTDOWN, KPS uses the times from CTS 3.0.c. CTS 3.0.c requires that within one hour action shall be initiated to place the unit in a	None	3.5.c Table TS 3.5-4 Functional Unit 2.a, Functional Unit 2.b, Functional Unit 2.c

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 M06 (continued)	MODE in which the Specification does not apply by placing it, as applicable, in at least HOT STANDBY within the next 6 hours, at least in HOT SHUTDOWN within the following 6 hours, and at least in COLD SHUTDOWN within the subsequent 36 hours. Under similar conditions (i.e., more than one installed channel inoperable) in the ITS for Functions 4.c, 4.d, and 4.e, ITS 3.3.2 provides no ACTIONS; therefore, entry into LCO 3.0.3 is required. LCO 3.0.3 requires that the unit be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in MODE 3 within 7 hours, in MODE 4 within 13 hours, and in MODE 5 within 37 hours. The ITS Applicability for Functions 4.c, 4.d and 4.e is MODE 1 and MODES 2 and 3 except when all MSIVs are closed and deactivated. Therefore, placing the unit in MODE 4 will place the unit in a condition in which the LCO does not apply. This changes the CTS by requiring less time for the unit to reach MODE 4 in the ITS than is allowed to reach MODE 5 in the CTS.	None	3.5.c Table TS 3.5-4 Functional Unit 2.a, Functional Unit 2.b, Functional Unit 2.c
3.3.2 M07	CTS Table TS 3.5-3 Column 6 specifies the "OPERATOR ACTION IF CONDITIONS OF COLUMN 3 OR 4 CANNOT BE MET." CTS Table TS 3.5-3 Column 6 requires maintaining HOT SHUTDOWN for Functional Units 4.a and 5.a. Based on the CTS Table TS 3.5-3 requirement to maintain HOT SHUTDOWN, the Mode of Applicability would be considered OPERATING (equivalent to ITS MODE 1) and HOT STANDBY (equivalent to ITS MODE 2). ITS LCO 3.3.2 requires the ESFAS instrumentation in Table 3.3.2-1 to be OPERABLE. ITS Table 3.3.2-1 reflects the APPLICABLE MODE OR OTHER SPECIFIED CONDITIONS for Function 6.b as MODES 1, 2, and 3. Commensurate with the change in the Mode of Applicability there is also a change in the MODE that the ACTION requires the plant to be in when channels are inoperable and not restored to OPERABLE status. CTS Table TS 3.5-3 requires the unit be maintained in HOT SHUTDOWN (equivalent to ITS MODE 3) in the event that the minimum number of OPERABLE channels is less than that required. Since there is no time limit to attain HOT SHUTDOWN, KPS uses the time limit from CTS 3.0.c. CTS 3.0.c requires that within 1 hour action shall be initiated to place the unit	3.3.2 ACTION D, Table 3.3.2-1 Function 6.b Applicability	Table TS 3.5-3 Functional Unit 4.a, Functional Unit 5.a

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 M07 (continued)	in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours. ITS LCO 3.3.2 ACTION D requires the unit be placed in MODE 4 to exit the LCO since Function 6.b is required in MODES 1, 2, and 3. The time allowed to place the unit in ITS MODE 4 via ITS 3.0.3 is also 13 hours; however, the time to reach MODE 3 in ITS is 6 hours in lieu of the current 13 hour time in CTS. This changes the CTS by explicitly stating the MODES of Applicability for each Functional Unit and requiring the ESFAS instrumentation Functions be OPERABLE in MODE 3, and changes the time allowed to reach MODE 3.	3.3.2 ACTION D, Table 3.3.2-1 Function 6.b Applicability	Table TS 3.5-3 Functional Unit 4.a, Functional Unit 5.a
3.3.2 M08	CTS 3.3.e.1 and CTS 3.3.e.1.A.3 state, in part, that the reactor shall not be made critical unless there is an OPERABLE turbine building service water header isolation logic capable of closing the header isolation valves, except when a turbine building service water header isolation valve is closed and de-activated. In the ITS, this is MODES 1 and 2 except when a turbine building service water header isolation valve is closed and de-activated. ITS Table 3.3.2-1, Functions 7a and 7.b (Turbine Building Service Water Header Isolation) are required to OPERABLE in MODES 1, 2, and 3 except when a turbine building service water header isolation valve is closed and de-activated. This changes the CTS by requiring the Turbine Building Service Water Header Isolation Function to be OPERABLE in MODE 3.	Table 3.3.2-1 Function 7.a and 7.b Applicability	3.3.e.1, 3.3.e.1.A.3
3.3.2 M09	CTS Table TS 4.1-1 does not provide Surveillance Requirements for testing the Manual Initiation of the Safety Injection, Containment Spray, Containment Isolation, and Steam Line Isolation Functions. ITS SR 3.3.2.5 and ITS Table 3.3.2-1 provide the testing requirements for the Manual Initiation of Functions 1.a (Safety Injection), 2.a (Containment Spray), 3.a (Containment Isolation), and 4.a (Steam Line Isolation). ITS SR 3.3.2.5 is the performance of a TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT) every 18 months. The SR contains a Note that states verification of setpoint is not required for manual initiation functions. This changes the CTS by adding new Surveillance Requirements.	SR 3.3.2.5	Table TS 4.1-1

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 M10	CTS 3.5.c states, in part, that when the number of channels of a subsystem fall below the limits given in Column 3 of Table TS 3.5-3 operation shall be limited according to the requirement shown in Column 6 as soon as practicable. If the conditions of Column 3 of CTS Table TS 3.5-3 cannot be met (i.e., less than the minimum number of OPERABLE channels), Column 6 requires that the unit be placed in HOT SHUTDOWN (equivalent to ITS MODE 3) for Functional Units 1.b and 3.b of Table TS 3.5-3. The HOT SHUTDOWN requirement in Column 6 contains a footnote, footnote (1) for Functional Unit 1.b of Table TS 3.5-3, which states if minimum conditions are not met within 24 hours (i.e., restoration of at least the minimum number of OPERABLE channels required in Column 3), steps shall be taken to place the plant in a COLD SHUTDOWN (equivalent to ITS MODE 5) condition. In addition, the HOT SHUTDOWN requirement in Column 6 contains a footnote, footnote (3) for Functional Unit 3.b of Table TS 3.5-3, which states if minimum conditions are not met within 24 hours (i.e., restoration of at least the minimum number of OPERABLE channels required in Column 3), steps shall be taken to place the plant in a COLD SHUTDOWN (equivalent to ITS MODE 5) condition. Since there are no time limits to attain HOT SHUTDOWN or COLD SHUTDOWN, KPS uses the time from CTS 3.0.c. CTS 3.0.c requires that within one hour action shall be initiated to place the unit in a MODE in which the Specification does not apply by placing it, as applicable, in at least HOT STANDBY within the next 6 hours, at least in HOT SHUTDOWN within the following 6 hours, and at least in COLD SHUTDOWN within the subsequent 36 hours. Under similar conditions (i.e., more than one installed channel inoperable) in the ITS for Functions 1.c and 2.c, ITS 3.3.2 provides no ACTIONS; therefore, entry into LCO 3.0.3 is required. LCO 3.0.3 requires that the unit be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in MODE 3 within 7 hours, in MODE 4 within 13 hours, and in MODE 5 within 37 hours. The ITS Applicability for Functions 1.c and 2.c is MODES 1, 2, and 3. Therefore, placing the unit in MODE 4 will place the unit in a condition in which the LCO does not apply. This changes the CTS by requiring less time for the unit to reach MODE 4 in the ITS than is allowed to reach MODE 5 in the CTS.	None	3.5.c, Table TS 3.5-3 Functional Unit 1.b, Functional Unit 3.b

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 M11	CTS Table TS 3.5-4 Column 6 for Functional Unit 1.b requires the unit be in HOT SHUTDOWN as the "OPERATOR ACTION IF CONDITIONS OF COLUMN 3 OR 4 CANNOT BE MET." Based on the CTS Table TS 3.5-4 requirement to be in HOT SHUTDOWN, the Mode of Applicability would be OPERATING (equivalent to ITS MODE 1) and HOT STANDBY (equivalent to ITS MODE 2). ITS LCO 3.3.2 requires the ESFAS instrumentation in Table 3.3.2-1 to be OPERABLE. ITS Table 3.3.2-1 Function 3.a requires the APPLICABLE MODE OR OTHER SPECIFIED CONDITIONS to be MODES 1, 2, 3, and 4. Commensurate with the change in the Mode of Applicability there is also a change in the MODE that the ACTION requires the plant to be placed in when channels are inoperable and not restored to OPERABLE status. CTS Table TS 3.5-4 requires the unit be placed in HOT SHUTDOWN (equivalent to ITS MODE 3) in the event that the minimum number of OPERABLE channels is less than that required. ITS LCO 3.3.2 ACTION B requires the unit be placed in MODE 5 to exit the LCO since Function 3.a is required in MODES 1, 2, 3, and 4. This changes the CTS Mode of Applicability from MODES 1 and 2 to MODES 1, 2, 3, and 4 and changes the MODE required to exit the LCO from MODE 3 to MODE 5.	3.3.2 ACTION B	Table TS 3.5-4 Functional Unit 1.b
3.3.2 M12	CTS Table TS 3.5-4 Column 6 for Functional Units 2.d and 4.a requires the unit be in HOT SHUTDOWN as the "OPERATOR ACTION IF CONDITIONS OF COLUMN 3 OR 4 CANNOT BE MET." Based on the CTS Table TS 3.5-4 requirement to be in HOT SHUTDOWN, the Mode of Applicability would be OPERATING (equivalent to ITS MODE 1) and HOT STANDBY (equivalent to ITS MODE 2). ITS LCO 3.3.2 requires the ESFAS instrumentation in Table 3.3.2-1 to be OPERABLE. ITS Table 3.3.2-1 Function 4.a requires the APPLICABLE MODE OR OTHER SPECIFIED CONDITIONS to be MODE 1 and MODES 2 and 3 except when all MSIVs are closed and de-activated. ITS Table 3.3.2-1 Function 5.b requires the APPLICABLE MODE OR OTHER SPECIFIED CONDITIONS to be MODE 1	Table 3.3.2-1 Function 5.b Applicability	Table TS 3.5-4 Functional Unit 2.d, Functional Unit 4.a

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 M12 (Continued)	and MODES 2 and 3 except when all MFIVs, MFRVs, and associated bypass valves are closed and de-activated or isolated by a closed manual valve. Commensurate with the change in the Mode of Applicability there is also a change in the Mode of Applicability to remove the unit from the LCO. CTS requires the unit be placed in HOT SHUTDOWN (equivalent to ITS MODE 3) in the event that the minimum number of OPERABLE channels is less than that required. Since no time is specified, KPS uses the time allowed to place the unit in HOT SHUTDOWN (equivalent to ITS MODE 3) via CTS 3.0.c, which is 13 hours. ITS LCO 3.3.2 requires the unit be placed in MODE 4 to exit the LCO since Function 4.a is required in MODE 1 and MODES 2 and 3 except when all MSIVs are closed and de-activated and Function 5.b is required in MODE 1 and MODES 2 and 3 except when all MFIVs, MFRVs, and associated bypass valves are closed and de-activated or isolated by a closed manual valve. The time allowed to place the unit in ITS MODE 4 via ITS 3.0.3 is also 13 hours; however, the time to reach MODE 3 in ITS is 7 hours in lieu of the current 13 hour time in CTS. This changes the CTS Mode of Applicability from MODES 1 and 2 to MODE 1 and MODES 2 and 3 except when all MSIVs are closed and de-activated (Function 4.a) and to MODE 1 and MODES 2 and 3 except when all MFIVs, MFRVs, and associated bypass valves are closed and de-activated or isolated by aclosed manual valve (Function 5.b), changes the Mode required to exit the LCO from MODE 3 to MODE 4, and changes the time allowed to reach MODE 3.	Table 3.3.2-1 Function 5.b Applicability	Table TS 3.5-4 Functional Unit 2.d, Functional Unit 4.a
3.3.2 M13	CTS 3.5.c states, in part, that when the number of channels of a subsystem fall below the limits given in Column 3 of Table TS 3.5-3 operation shall be limited according to the requirement shown in Column 6 as soon as practicable. If the conditions of Column 3 of CTS Table TS 3.5-3 cannot be met (i.e., less than the minimum number of OPERABLE channels), Column 6 requires that the unit be placed in HOT SHUTDOWN (equivalent to ITS MODE 3) for Functional Unit 4.b. Since there is no time limit to attain HOT SHUTDOWN, KPS uses the time limit from CTS 3.0.c. CTS 3.0.c requires that within one hour action shall be initiated to place the unit in a MODE in which the Specification does not apply by placing it, as applicable, in at least HOT STANDBY within the next 6 hours, at least in HOT	None	3.5.c Table TS 3.5-3 Functional Unit 4.b

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 M13 (continued)	SHUTDOWN within the following 6 hours, and at least in COLD SHUTDOWN within the subsequent 36 hours. In the ITS for Function 6.e, no ACTIONS are provided in ITS 3.3.2 when more than one channel or train is inoperable; therefore, entry into LCO 3.0.3 is required. LCO 3.0.3 requires that the unit be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in MODE 3 within 7 hours, in MODE 4 within 13 hours, and in MODE 5 within 37 hours. The ITS Applicability for Function 6.e is MODES 1 and 2. Therefore, placing the unit in MODE 3 will place the unit in a condition in which the LCO does not apply. This changes the CTS by requiring less time for the unit to reach MODE 3 in the ITS than is allowed to reach MODE 3 in the CTS.	None	3.5.c Table TS 3.5-3 Functional Unit 4.b
3.3.2 M14	CTS Table TS 4.1-1 does not provide Surveillance Requirements for testing the Auxiliary Feedwater – Undervoltage Reactor Coolant Pump Functions. ITS Table 3.3.2-1 Function 6.d (Auxiliary Feedwater – Undervoltage Reactor Coolant Pump) requires the performance of a TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT) (SR 3.3.2.3) every 92 days and the performance of a CHANNEL CALIBRATION (SR 3.3.2.6) every 18 months. ITS SR 3.3.2.3 contains a Note that states verification of relay setpoints is not required. This changes the CTS by adding new Surveillance Requirements.	SR 3.3.2.3, SR 3.3.2.6	None
3.3.2 M15	ITS Table 3.3.2-1 requires the performance of a CHANNEL CHECK every 12 hours (SR 3.3.2.1), a CHANNEL OPERATIONAL TEST (COT) every 184 days (SR 3.3.2.4), and a CHANNEL CALIBRATION every 18 months (SR 3.3.2.6) for Functions 4.d (Steam Line Isolation – High Steam Flow Coincident with Safety Injection and Coincident with T_{avg}-Low Low) and 4.e (Steam Line Isolation – High High Steam Flow Coincident with Safety Injection). CTS Table TS 4.1-1 does not contain these Surveillance Requirements. This changes the CTS by adding new Surveillance Requirements.	SR 3.3.2.1 SR 3.3.2.4 SR 3.3.2.6	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 M16	ITS LCO 3.3.2 requires the ESFAS Instrumentation to be OPERABLE. ITS Table 3.3.2-1, Function 8 (ESFAS Interlock – Reactor Trip (P-4)) requires one channel per train to be OPERABLE in MODES 1, 2, and 3. ITS ACTION F has been added to cover the Condition of when one channel or train is inoperable for Function 8. ITS Required Action F.1 allows 48 hours to restore the required channel or train to OPERABLE status. If this cannot be met, then ITS Required Action F.2.1 requires the unit be in MODE 3 within 54 hours and Required Action F.2.2 requires the unit be in MODE 4 within 60 hours. A Note has been added to the ACTIONS to allow separate Condition entry for each Function. Separate Condition entry is also allowed within a Function for the ESFAS Interlock – Reactor Trip (P-4) on a per train basis. In addition, a TADOT (SR 3.3.2.7) is required to be performed prior to closing the reactor trip breaker or reactor trip bypass breaker following each reactor trip breaker cycle. As discussed in the ITS Bases, a reactor trip breaker cycle is defined as when a reactor trip breaker and its associated reactor trip bypass breaker are opened. The TADOT (SR 3.3.2.7) contains a Note that states verification of setpoint is not required. The CTS does not require OPERABLE channels for this Function. This changes the CTS by adding new Functions and applicable ACTIONS and SRs.	SR 3.3.2.7	None
3.3.2 M17	CTS 3.5.c states, in part, that when the number of channels of a subsystem fall below the limits given in Column 3 of Table TS 3.5-3 operation shall be limited according to the requirement shown in Column 6 as soon as practicable. If the conditions of Column 3 of CTS Table TS 3.5-3 cannot be met (i.e., less than the minimum number of OPERABLE channels), Column 6 requires that the unit be placed in HOT SHUTDOWN (equivalent to ITS MODE 3) for Functional Units 1.c, and 1.d of Table TS 3.5-3. The HOT SHUTDOWN requirement in Column 6 contains a footnote, footnote (1) for Functional Unit 1.c and 1.d of Table TS 3.5-3, which states if minimum conditions are not met within 24 hours (i.e., restoration of at least the minimum number of OPERABLE channels required in Column 3), steps shall be taken to place the plant in a COLD SHUTDOWN (equivalent to ITS MODE 5) condition. Since there are no time limits to attain HOT SHUTDOWN or COLD SHUTDOWN, KPS uses the time limit from CTS 3.0.c. CTS 3.0.c requires that within one hour action shall be initiated to place the unit in a MODE in which the Specification does not apply by placing it, as applicable, in at least HOT STANDBY	None	3.5.c, Table 3.5-3 Functional Unit 1.c, Functional Unit 1.d

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 M17 (continued)	within the next 6 hours, at least in HOT SHUTDOWN within the following 6 hours, and at least in COLD SHUTDOWN within the subsequent 36 hours. Under similar conditions (i.e., more than one installed channel inoperable) in the ITS for Functions 1.d and 1.e, ITS 3.3.2 provides no ACTIONS; therefore, entry into LCO 3.0.3 is required. LCO 3.0.3 requires that the unit be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in MODE 3 within 7 hours, in MODE 4 within 13 hours, and in MODE 5 within 37 hours. The ITS Applicability for Functions 1.d and 1.e is MODES 1 and 2 and MODE 3 with pressurizer pressure ≥ 2000 psig. Therefore, placing the unit in MODE 4 will place the unit in a condition in which the LCO does not apply. This changes the CTS by requiring less time for the unit to reach MODE 4 in the ITS than is allowed to reach MODE 5 in the CTS.	None	3.5.c, Table 3.5-3 Functional Unit 1.c, Functional Unit 1.d
3.3.2 M18	CTS does not include an ACTUATION LOGIC TEST for the Turbine Building Service Water Header Isolation Logic. ITS Table 3.3.2-1 Function 7.a, Automatic Actuation Logic and Actuation Relays, requires performance of ITS SR 3.3.2.8, which is an ACTUATION LOGIC TEST every 18 months. This changes the CTS by specifying a new Surveillance Requirement.	SR 3.3.2.8	None
3.3.3 M01	CTS 3.5.e requires the accident monitoring instrumentation in Table TS 3.5-6 to be OPERABLE whenever the plant is above HOT SHUTDOWN; i.e., in OPERATING and HOT STANDBY MODES (ITS equivalent MODES 1 and 2). ITS 3.3.3 is applicable in MODES 1, 2, and 3. This changes the CTS by requiring the PAM Instrumentation to be OPERABLE in MODE 3.	3.3.3 Applicability	3.5.e Table TS 3.5-6
3.3.3 M02	CTS 3.5.e states that when PAM instrumentation is inoperable, a change in operational MODES or conditions is acceptable. ITS 3.3.3 does not include this allowance. However, ITS LCO 3.0.4 includes a similar allowance, except that ITS LCO 3.0.4.b requires, prior to changing MODES, the performance of a risk assessment addressing inoperable systems and components, consideration of the results, a determination of the acceptability of entering the MODE or other specified condition in the Applicability, and the establishment of risk management actions, if appropriate. This changes the CTS by deleting this specific allowance from the PAM Instrumentation Specification and allowing ITS LCO 3.0.4 to govern this allowance, and modifying the allowance to require a risk assessment prior to using the allowance.	None	3.5.e

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.3 M03	CTS Table TS 3.5-6 does not require OPERABLE indication channels for Intermediate Range Neutron Flux, Steam Generator Pressure, Reactor Coolant System (RCS) Hot Leg Temperature, RCS Cold Leg Temperature, RCS Pressure (Wide Range), Penetration Flow Path Containment Isolation Valve (CIV) Position, Containment Area Radiation (High Range), Pressurizer Level, Service Water (SW) Supply Valve to Auxiliary Feedwater Pumps, Steam Generator Level (Narrow Range), Refueling Water Storage Tank Level, and Heat Removal by the Containment Fan Coil Units (Service Water Supply Valve Position Indication). These indication channels are added to the CTS and shown in ITS Table 3.3.3-1, Functions 1, 2, 3, 4, 5, 9, 10, 11, 13, 19, 20, and 21. Two channels per Function are required for the following Functions: Intermediate Range Neutron Flux (Function 1), RCS Hot Leg Temperature (Function 3), RCS Cold Leg Temperature (Function 4), Containment Area Radiation (High Range) (Function 10), Pressurizer Level (Function 11), Refueling Water Storage Tank Level (Function 20). In addition, two channels per steam generator are required for the Steam Generator Pressure (Function 2), two channels per penetration are required for the Penetration Flow Path Containment Isolation Valve Position (Function 9), three channels are required for the Service Water Supply Valve to Auxiliary Feedwater Pumps (Function 13), two channels per steam generator are required for the Steam Generator Level (Function 19), and four channels are required for the Heat Removal by the Containment Fan Coil Units (Service Water Supply Valve Position Indication) (Function 21). Furthermore, the requirements for Function 9 are modified by two footnotes, footnotes (a) and (b). Footnote (a) does not require position indication for isolation valves whose associated penetration is isolated by at least one closed and deactivated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured. Footnote (b) requires only one position indication channel for penetration flow paths with only one installed control room indication channel. ITS 3.3.3 ACTION A has been added to cover the Condition when one or more of the above Functions has one required channel inoperable. ITS 3.3.3 Required Action A.1 allows 30 days to restore the required channel to OPERABLE status. If the Required Action and Completion Time of Condition A is not met, then ITS Required Action B.1 requires the immediate initiation of actions specified in Specification 5.6.4. ITS 3.3.3 ACTION C has been added to cover the Condition	3.3.3 ACTION A, 3.3.3 ACTION C, Table 3.3.3-1 Function 1, 2, 3, 4, 5, 9, 10, 11, 13, 19, 20, and 21	Table TS 3.5-6

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.3 M03 (Continued)	when one or more of the above Functions have two or more required channels inoperable. ITS 3.3.3 Required Action C.1 requires restoration of all but one channel to OPERABLE status within 7 days. If this cannot be met, or if the Required Action and Associated Completion Time of Condition C is not met, then ITS 3.3.3 Condition D must be entered, which then requires entry into Condition E. ITS 3.3.3 Required Action E.1 requires the unit to be in MODE 3 within 6 hours and MODE 4 within 12 hours. A Note has been added to the ACTIONS to allow separate Condition entry for each Function. In addition, separate Condition entry is allowed within a Function for Function 9 on a penetration flow path basis and Functions 2 and 19 on a steam generator basis. In addition, SRs are added for each Function. These SRs are a CHANNEL CHECK for each required instrumentation channel that is normally energized (SR 3.3.3.1) and a CHANNEL CALIBRATION (SR 3.3.3.3). This changes the CTS by adding new Functions and applicable ACTIONS and SRs.	3.3.3 ACTION A, 3.3.3 ACTION C, Table 3.3.3-1 Function 1, 2, 3, 4, 5, 9, 10, 11, 13, 19, 20, and 21	Table TS 3.5-6
3.3.3 M04	CTS Table TS 3.5-6 Footnote (1) states, in part, that with the number of OPERABLE accident monitoring instrumentation channels less than the minimum channels OPERABLE requirements, and not restored within the allowed time, a unit shutdown to HOT STANDBY (equivalent to ITS MODE 2) within 6 hours and to HOT SHUTDOWN (equivalent to ITS MODE 3) within the following 6 hours is required. ITS 3.3.3 Required Action E.1 requires that the unit be in MODE 3 within 6 hours and ITS 3.3.3 Required Action E.2 requires that the unit be in MODE 4 within 12 hours. This change deletes the requirement to be in HOT STANDBY (equivalent to ITS MODE 2) within 6 hours, changes the time required to be in HOT SHUTDOWN (equivalent to ITS MODE 3) from 12 hours to 6 hours, and adds a new Required Action to be in ITS MODE 4 within 12 hours.	3.3.3 ACTION E	Table TS 3.5-6
3.3.3 M05	CTS 3.11.c states that a minimum of four thermocouples per quadrant shall be available for readout if the reactor is operated above 85% with one excore nuclear power channel out of service. ITS Table 3.3.3-1 Functions 14, 15, 16, and 17 require four thermocouples/core quadrant to be OPERABLE in MODES 1, 2, and 3. This changes the CTS by requiring the Core Exit Thermocouples be OPERABLE in more MODES than in CTS.	Table 3.3.3-1 14, 15, 16, and 17 Applicability	3.11.c

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.3 M06	CTS Table TS 4.1-1 Channel Description 39, Containment Water Level (Wide Range), does not require the performance of a CHANNEL CHECK. ITS SR 3.3.3.1 requires the performance of a CHANNEL CHECK for each required instrumentation channel that is normally energized every 31 days. This changes the CTS by adding a new Surveillance Requirement for the Containment Sump Water Level (Wide Range) Function.	SR 3.3.3.1	Table TS 4.1-1 Channel Description 39
3.3.4 M01	The CTS does not contain any requirements for the Dedicated Shutdown System to be OPERABLE. ITS 3.3.4 requires the Dedicated Shutdown System Functions to be OPERABLE in MODES 1, 2, and 3. The ITS also provides ACTIONS (ACTIONS A and B) when the LCO is not met and Surveillance Requirements (ITS SR 3.3.4.1, SR 3.3.4.2, and SR 3.3.4.3) to verify the Dedicated Shutdown System Functions are OPERABLE. This changes the CTS by incorporating the requirements of ITS 3.3.4.	SR 3.3.4.1, SR 3.3.4.2, SR 3.3.4.3	None
3.3.5 M01	CTS 3.5.c states, in part, that when the number of channels of a subsystem falls below the limits given in Table TS 3.5-5 Column 3, or if the values in Column 4 cannot be achieved, operation shall be limited according to the requirement shown in Column 6 as soon as practicable. Table TS 3.5-5 Functional Unit 2 (Safeguards Bus Second Level Undervoltage), Column 3 does not require any Safeguards Bus Second Level Undervoltage channels per bus to be OPERABLE and Column 4 has no minimum degree of redundancy specified. Thus, while there is one Safeguards Bus Second Level Undervoltage channel in the KPS design, the CTS allows the only Safeguards Bus Second Level Undervoltage channel to be inoperable for an indefinite amount of time without specifying any required actions. While Column 6 includes required actions, these actions are only required to be taken if Column 3 or 4 conditions cannot be met. ITS LCO 3.3.5 requires one Safeguards Bus Second Level Undervoltage (degraded voltage) channel per bus to be OPERABLE. ITS 3.3.5 ACTION A provides compensatory actions to take with one channel per bus inoperable and includes the CTS Column 6 requirement if the channel is inoperable due to one inoperable relay (see Required Action A.1, including Note 2). If both relays are inoperable or the channel is otherwise inoperable, Required Action A.2 states to restore the channel to OPERABLE status within 1 hour. If the requirements of ACTION A are not met, ITS 3.3.5 ACTION B requires immediately entering the applicable Condition and required Action for the associated DG made inoperable by	3.3.5 ACTION A	3.5.c Table 3.5-2 Functional Unit 2

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.5 M01 (continued)	LOOP DG start instrumentation. This changes the CTS by requiring one channel per bus of the Safeguards Bus Second Level Undervoltage Functional Unit to be OPERABLE, instead of zero channels per bus, and by adding specific ACTIONS to take when a channel is inoperable.	3.3.5 ACTION A	3.5.c Table 3.5-2 Functional Unit 2
3.3.5 M02	CTS 3.5 does not provide any specific Applicability for the LOOP DG Start Instrumentation. However, for CTS Table TS 3.5-5 Functional Unit 1, Safeguards Bus Undervoltage (loss of voltage), the Column 6 actions require the unit to be in HOT SHUTDOWN (ITS equivalent MODE 3) when the Column 3 or 4 conditions are not met. Thus, effectively the CTS Applicability is OPERATING and HOT STANDBY (ITS equivalent MODES 1 and 2). ITS 3.3.5 requires the LOOP DG Start Instrumentation to be OPERABLE in MODES 1, 2, 3, and 4 and when the associated DG is required to be OPERABLE by LCO 3.8.2, "AC Sources – Shutdown." This changes the CTS by adding additional Applicability conditions for the LOOP DG Start Instrumentation.	3.3.5 Applicability	Table 3.5-5 Functional Unit 1
3.3.6 M01	CTS 3.5.c states, in part, that when the number of channels of a subsystem fall below the limits given in Table TS 3.5-4 Column 3, operation shall be limited according to the requirement shown in Column 6 as soon as practicable. Table TS 3.5-4 Functional Unit 1.b (Containment Isolation - Manual), Column 3 requires one Manual channel to be OPERABLE. Thus, while there are two Manual channels in the KPS design, the CTS allows one of the Manual channels to be inoperable for an indefinite amount of time; no actions are required when one of the two Manual channels is inoperable. ITS Table 3.3.6-1 Functional Unit 3 references ITS LCO 3.3.2 for the number of required channels. ITS Table 3.3.2-1 Function 3.a requires two channels of the Containment Isolation – Manual Initiation Function to be OPERABLE and provides the appropriate ACTION and Surveillance Requirements. ITS 3.3.2 ACTION B provides compensatory actions to take with one Manual channel inoperable. ACTION B requires restoring the channel to OPERABLE status within 48 hours or to be in MODE 3 within 54 hours and MODE 5 within 84 hours. This changes the CTS by requiring two channels of the Manual Initiation Functional Unit to be OPERABLE instead of one channel and by adding a specific ACTION to take when one of the two required channels is inoperable.	3.3.2 ACTION B, Table 3.3.6-1 Function 3.a and 3.b Required Channels	3.5.c, Table 3.5-4 Functional Unit 1.b

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.6 M02	CTS Table TS 3.5-4 Functional Unit 3 provides requirements for Containment Ventilation Isolation Functions, but does not explicitly provide requirements for the Automatic Actuation Logic and Actuation Relays Function that result in closure of the containment purge supply and vent isolation valves. ITS 3.3.6, "Containment Purge and Vent Isolation Instrumentation," requires the Automatic Actuation Logic and Actuation Relays (Function 1) to be OPERABLE, provides appropriate ACTIONS if the Function is inoperable (ITS 3.3.6 ACTIONS B and C), and provides a Surveillance Requirement (ITS SR 3.3.6.2) to ensure the proper functioning of the associated actuation logic relays. This changes the CTS by explicitly requiring the Automatic Actuation Logic and Actuation Relays Function for the Containment Purge and Vent System isolation instrumentation to be OPERABLE and providing appropriate ACTIONS and Surveillance Requirements.	SR 3.3.6.2	Table TS 3.5-4 Functional Unit 3
3.3.6 M03	CTS Table TS 4.1-1 Channel Description 19 requires a Daily instrument check of the radiation monitoring system. ITS SR 3.3.6.1 requires the performance of a CHANNEL CHECK of the required containment purge and vent isolation radiation monitors every 12 hours. This changes the CTS by requiring a check of the required containment purge and vent isolation radiation monitors more often in ITS than in CTS.	SR 3.3.6.1	Table TS 4.1-1 Channel Description 19
3.3.6 M04	CTS 3.5.d states, in part, that in the event of subsystem instrumentation channel failure permitted by CTS 3.5.b, then Tables TS 3.5-2 through TS 3.5-5 need not be observed for approximately 4 hours while the operable channels are tested, as long as the failed channel is blocked to prevent an unnecessary reactor trip. CTS 3.5.b states, in part, that in the event of failure of a subsystem instrumentation channel, plant operation shall be permitted to continue at RATED POWER in accordance with Tables TS 3.5-2 through TS 3.5-5. ITS 3.3.6 does not contain this allowance. This changes the CTS by removing the allowance to block a failed channel.	None	3.5.d

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.6 M05	CTS Table TS 3.5-4 Functional Unit 1.b requires that when both Containment Isolation Manual channels are inoperable, to place the unit in HOT SHUTDOWN (ITS MODE 3). Since there is no time limit to attain HOT SHUTDOWN, KPS uses the time limit from CTS 3.0.c. CTS LCO 3.0.c requires that within 1 hour action shall be initiated to place the unit in at least HOT STANDBY (equivalent to ITS MODE 2) within the next 6 hours and in HOT SHUTDOWN (equivalent to ITS MODE 3) within the following 6 hours. ITS 3.3.6 references ITS 3.3.2 for the appropriate requirements for the Containment Isolation - Manual Initiation Function. ITS 3.3.2, which requires two Containment Isolation - Manual Initiation channels to be OPERABLE in MODES 1, 2, 3, and 4, does not provide any ACTIONS to take when both Containment Isolation - Manual Initiation channels are inoperable. Therefore, ITS LCO 3.0.3 would be entered, which requires actions to be taken within 1 hour to be in MODE 3 within 7 hours, to be in MODE 4 within 13 hours, and to be in MODE 5 within 37 hours. This changes the CTS by allowing less time to reach HOT SHUTDOWN (ITS MODE 3) in the ITS than in the CTS (7 hours in the ITS versus 13 hours in the CTS) and by requiring the unit to go to MODE 5 in lieu of MODE 3.	LCO 3.0.3	Table TS 3.5.4-1 Functional Unit 1.b
3.3.7 M01	The CTS 3.12.a Applicability of the Control Room Post-Accident Recirculation (CRPAR) System is that the reactor shall not be made critical unless both trains of the CRPAR System are OPERABLE. When one inoperable train is not restored in 7 days, CTS 3.12.b requires the unit to be shutdown (i.e., non-critical or ITS equivalent MODE 3) in 12 hours. Since the Automatic Actuation Logic and Actuation Relays and the Control Room Vent Radiation Monitor support OPERABILITY of the CRPAR System, the Applicability of the Automatic Actuation Logic and Actuation Relays and the Control Room Vent Radiation Monitor are the same as the CRPAR System – they are only required in the OPERATING and HOT STANDBY MODES (ITS equivalent MODES 1 and 2). ITS Table 3.3.7-1, in part, requires the	3.3.7 ACTION B, 3.3.7 ACTION C, Table 3.3.7-1 Function 1 and 2	3.12.a, 3.12.b

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.7 M01 (Continued)	Automatic Actuation Logic and Actuation Relays and the Control Room Vent Radiation Monitor to be OPERABLE in MODES 1, 2, 3, and 4. Consistent with this change in Applicability, the following changes and additions regarding actions taken when one or both trains of the Automatic Actuation Logic and Actuation Relays or the Control Room Vent Radiation Monitor is inoperable: a) When one train of Automatic Actuation Logic and Actuation Relays is inoperable in MODE 3 or 4, ITS 3.3.7 ACTION A will require placing the associated CRPAR train in the emergency mode within 7 days; b) When both trains of Automatic Actuation Logic and Actuation Relays or the Control Room Vent Radiation Monitor is inoperable in MODE 3 or 4, ITS 3.3.7 ACTION B requires either placing one CRPAR train in the emergency mode and declaring the other CRPAR train inoperable (and entering the applicable Conditions and Required Actions of ITS 3.7.10) immediately, or placing both CRPAR trains in the emergency mode immediately; and c) If either ACTION A or B is not met in MODE 3 or 4, or a unit shutdown is required while the unit is in MODE 1 or 2, ITS 3.3.7 Required Action C.2 requires the unit to be in MODE 5 within 36 hours. Furthermore, Required Action C.1 only provides 6 hours to be in MODE 3. This changes the CTS by requiring the Automatic Actuation Logic and Actuation Relays and the Control Room Vent Radiation Monitor to be OPERABLE in MODES 3 and 4, providing ACTIONS to take when the instruments are inoperable in MODES 3 and 4, decreases the time to reach subcritical conditions (i.e., MODE 3) from 12 hours to 6 hours, and provides a Required Action (Required Action C.2) to place the unit outside the new Applicability. The addition of the MODES 5 and 6 and during movement of irradiated fuel assemblies Applicability is discussed in DOC M02.	3.3.7 ACTION B, 3.3.7 ACTION C, Table 3.3.7-1 Function 1 and 2	3.12.a, 3.12.b
3.3.7 M02	The CTS does not contain any requirements for the CRPAR System, nor its associated instrumentation (Automatic Actuation Logic and Actuation Relays and the Control Room Vent Radiation Monitor) in MODES 5 and 6 and during movement of irradiated fuel assemblies. ITS Table 3.3.7-1 Functions 1 and 2 Applicability includes MODES 5 and 6 and during movement of irradiated fuel assemblies. Consistent with this change in Applicability, the following additions regarding actions taken when one or both trains of the Automatic Actuation Logic and Actuation Relays or the Control Room Vent	3.3.7 ACTION A, 3.3.7 ACTION D, 3.3.7 ACTION E, Table 3.3.7-1 Function 1 and 2 Applicability	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.7 M02 (continued)	Radiation Monitor is inoperable: a) When one train of Automatic Actuation Logic and Actuation Relays is inoperable in MODE 5 or 6 or during movement of irradiated fuel assemblies, ITS 3.3.7 ACTION A will require placing the associated CRPAR train in the emergency mode within 7 days; b) When both trains of Automatic Actuation Logic and Actuation Relays or the Control Room Vent Radiation Monitor is inoperable in MODE 5 or 6 or during movement of irradiated fuel assemblies, ITS 3.3.7 ACTION B requires either placing one CRPAR train in the emergency mode and declaring the other CRPAR train inoperable (and entering the applicable Conditions and Required Actions of ITS 3.7.10) immediately, or placing both CRPAR trains in the emergency mode immediately; c) If either ACTION A or B is not met during movement of irradiated fuel assemblies, ITS 3.3.7 ACTION D requires movement of irradiated fuel assemblies to be suspended immediately; and d) If either ACTION A or B is not met in MODE 5 or 6, ITS 3.3.7 ACTION E requires action to be immediately initiated to restore one CRPAR train to OPERABLE status. This changes the CTS by requiring the Automatic Actuation Logic and Actuation Relays and the Control Room Vent Radiation Monitor to be OPERABLE in MODES 5 and 6 and during movement of irradiated fuel assemblies and by providing ACTIONS to take when the instruments are inoperable in the new Applicability.	3.3.7 ACTION A, 3.3.7 ACTION D, 3.3.7 ACTION E, Table 3.3.7-1 Function 1 and 2 Applicability	None
3.3.7 M03	CTS Table TS 4.1-1 Channel Description 19 requires a Daily instrument check of the radiation monitoring system. ITS SR 3.3.7.1 requires the performance of a CHANNEL CHECK of the control room vent radiation monitor every 12 hours. This changes the CTS by requiring a check of the control room vent radiation monitor more often in ITS than in CTS.	SR 3.3.7.1	Table TS 4.1-1 Channel Description 19
3.3.7 M04	CTS 3.12 provides requirements for the CRPAR System, but does not explicitly provide requirements for the Automatic Actuation Logic and Actuation Relays that result in actuation of the CRPAR System. ITS 3.3.7 provides requirements for the Automatic Actuation Logic and Actuation Relays Function (Function 1) to be OPERABLE (as discussed in DOC A02) and provides a Surveillance Requirement (ITS SR 3.3.7.3) to ensure proper functioning of the Automatic Actuation Logic and Actuation Relays. This changes the CTS by providing a Surveillance Requirement to help ensure the Automatic Actuation Logic and Actuation Relays Function for the CRPAR Actuation Instrumentation is OPERABLE.	SR 3.3.7.3	3.12

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.1 M01	CTS 3.10.m states, in part, that if the reactor coolant flow is not restored to within limits to reduce power to < 5% of thermal rated power. It further states that following analysis, thermal power may be raised not to exceed a power level analyzed to maintain a departure from nucleate boiling ratio (DNBR) greater than the minimum DNBR limit. ITS 3.4.1 ACTION B requires that if the RCS DNB parameters are not restored to be in MODE 2 within 6 hours. This changes the CTS by not allowing an analysis to be performed to raise THERMAL POWER	3.4.1 ACTION B	3.10.m
3.4.1 M02	ITS SR 3.4.1.1 requires verification that the pressurizer pressure is greater than or equal to the limit specified in the COLR every 12 hours. ITS SR 3.4.1.2 requires verification that the RCS average temperature is less than or equal to the limit specified in the COLR every 12 hours. ITS SR 3.4.1.3 requires verification that the RCS total flow rate is ≥ 178,000 gpm and greater than or equal to the limit specified in the COLR every 12 hours. The CTS does not contain these Surveillance Requirements. This changes the CTS by adding Surveillance Requirements to verify that the pressurizer pressure is greater than or equal to the limit specified in the COLR, the RCS average temperature is less than or equal to the limit specified in the COLR, and the RCS total flow rate is ≥ 178,000 gpm and greater than or equal to the limit specified in the COLR.	SR 3.4.1.1, SR 3.4.1.2, SR 3.4.1.3	None
3.4.2 M01	The CTS does not have any requirements for RCS minimum temperature for criticality. ITS 3.4.2 requires that each RCS loop average temperature (Tavg) shall be ≥ 540ºF in MODE 1 and in MODE 2 with keff ≥ 1.0. This changes the CTS by incorporating the requirements of ISTS 3.4.2. The ITS also provides an Action for when Tavg in one or more RCS loops is not within limits (ACTION A) and a Surveillance Requirement (SR 3.4.2.1).	3.4.2 ACTION A, SR 3.4.2.1	None
3.4.3 M01	CTS 3.1.b.1 does not provide any Applicability requirements for the Heatup and Cooldown Limit Curves. ITS 3.4.3 requires the RCS Pressure, RCS Temperature, and RCS heatup and cooldown rates to be maintained with limits "at all times." This changes the CTS by specifically stating that the RCS Pressure, RCS Temperature, and RCS heatup and cooldown rates to maintained with limits are required "at all times."	LCO 3.4.3	3.1.b.1

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.3 M02	CTS 3.1.b.1 provides limits for reactor coolant temperature and pressure and system heatup and cooldown rates. It does not specify Actions to take when the limitations are not met, therefore, CTS 3.0.c would be entered. CTS 3.0.c requires action to be initiated within 1 hour and to be in HOT STANDBY (equivalent to MODE 2) within the next 6 hours, HOT SHUTDOWN (equivalent to MODE 3) within the following 6 hours, and COLD SHUTDOWN (equivalent to MODE 5) within the subsequent 36 hours. ITS 3.4.3 adds ACTION A, which states that if the requirements of the LCO are not met in MODE 1, 2, 3, or 4 to restore the parameters to within limits in 30 minutes and to determine if the RCS is acceptable for continued operation within 72 hours. It also adds ACTION B, which states that if the Required Action and associated Completion Time of Condition A is not met, then to be in MODE 3 within 6 hours and be in MODE 5 with the RCS pressure less than 500 psig within 36 hours. Additionally, it adds ACTION C, which states that if the requirements of the LCO are not met when not in MODE 1, 2, 3, or 4 to initiate action to restore the parameters to within limits immediately and to determine the RCS is acceptable for continued operation prior to entering MODE 4. This changes the CTS by adding specific ITS 3.4.3 ACTIONS A, B, and C.	3.4.3 ACTION A, 3.4.3 ACTION B, 3.4.3 ACTION C	3.1.b.1
3.4.3 M03	CTS 3.1.b.1 provides pressure and temperature (P/T) limits during heatup and cooldown. However, there is no specific Surveillance Requirement for verification that the CTS pressure and temperature are within the P/T limits. ITS SR 3.4.3.1 requires verification that the RCS Pressure, RCS Temperature, and RCS heatup and cooldown rates are within limits every 30 minutes during RCS heatup and cooldown operations and RCS inservice leak and hydrostatic testing. This changes the CTS by adding a specific Surveillance Requirement to verify the RCS heatup and cooldown rates are met.	SR 3.4.3.1	3.1.b.1

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.4 M01	CTS 3.1.a.1.B states, in part, that both reactor coolant pumps shall be in operation when the reactor is in the OPERATING (equivalent to ITS MODE 1) mode. ITS 3.4.4 requires two RCS loops to be OPERABLE and in operation in MODE 1 (equivalent to CTS OPERATING) and MODE 2 (equivalent to CTS HOT STANDBY). Furthermore, in the event there are less than two reactor coolant pumps operating, CTS 3.1.a.1.B does not contain any actions to be taken; CTS 3.0.c would be entered. CTS 3.0.c requires action to be initiated within 1 hour and to be in HOT STANDBY (equivalent to ITS MODE 2) in the following 6 hours. ITS 3.4.4 adds an ACTION statement to be in MODE 3 in 6 hours if the requirements of the LCO (i.e., two RCS loops OPERABLE and in operation) are not met. This changes the CTS by requiring the RCS loops be OPERABLE and in operation in MODE 2 and an appropriate ACTION to exit the Applicability if the LCO is not met.	3.4.4 ACTION A	3.1.a.1.B
3.4.4 M02	CTS 3.1.a.1.B states, in part, both reactor coolant pumps are required to be in operation except for low power tests. ITS 3.4.4 does not include this exception; the reactor coolant pumps are required during PHYSICS TESTS. This changes the CTS by requiring the reactor coolant pumps to be OPERABLE during PHYSICS TESTS.	None	3.1.a.1.B
3.4.4 M03	CTS 3.1.a.1.B does not contain a Surveillance Requirement to verify each RCS loop is in operation. ITS SR 3.4.4.1 requires verification that each RCS loop is in operation every 12 hours. This changes the CTS by requiring the operation of each RCS loop be verified every 12 hours.	SR 3.4.4.1	3.1.a.1.B

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.5 M01	CTS 3.1.a.1.A requires one reactor coolant pump (RCP) to be in operation under a certain condition, but it does not provide any requirements that the associated Reactor Coolant System (RCS) loop be OPERABLE. ITS 3.4.5 requires two RCS loops to be OPERABLE. OPERABILITY of an RCS loop is defined in the ITS Bases as an OPERABLE RCP and one OPERABLE steam generator, and an OPERABLE RCP is OPERABLE if it is capable of being powered and able to provide forced flow. Thus, to ensure the RCP loops are OPERABLE, ITS SR 3.4.5.2 requires verification of steam generator secondary side water levels are ≥ 5% for required RCS loops every 12 hours. ITS SR 3.4.5.3 requires verification that each required RCP is OPERABLE every 7 days by verifying correct breaker alignment and indicated power are available to each required pump. A Note further explains that the Surveillance is not required to be performed until 24 hours after a required pump is not in operation. Furthermore, ITS 3.4.5 ACTIONS A and B provide the appropriate compensatory measures if one of the RCS loops is inoperable in that restoration of the inoperable RCS loop is required within 72 hours (ITS 3.4.5 ACTION A) and if not restored, to be in MODE 4 within 12 hours (ITS 3.4.5 ACTION B). If both RCS loops are inoperable, ITS 3.4.5 ACTION C requires immediate suspension of operations that would cause introduction of coolant into the RCS with boron concentration less than required to meet the SDM limit of LCO 3.1.1 and initiation of action to restore one RCS loop to OPERABLE status. This changes the CTS by adding new OPERABILITY requirements for two RCS loops and appropriate ACTIONS and Surveillance Requirements.	3.4.5 ACTION A, 3.4.5 ACTION B, SR 3.4.5.2, SR 3.4.5.3	3.1.a.1.A
3.4.5 M02	CTS 3.1.a.1.A, which requires an RCP to be in operation, is applicable in MODE 3 only when a reduction is made in the boron concentration of the reactor coolant. ITS 3.4.5 is applicable at all times when in MODE 3, except for ≤1 hour per 8 hour period provided a) no operations are permitted that would cause introduction of coolant into the RCS with boron concentration less than required to meet the SDM of LCO 3.1.1; and, b) core outlet temperature is maintained at least 10°F below saturation temperature (ITS 3.4.5 LCO Note). This changes the CTS by specifying that the LCO requirement for an RCP to be in operation is applicable in MODE 3 at all times except for those conditions specified in the ITS 3.4.5 LCO Note.	3.4.5 Applicability	3.1.a.1.A

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.5 M03	CTS 3.1.a.1 does not contain any ACTIONS to take should there be less than the required number of reactor coolant pumps in operation when required. As a result, CTS 3.0.c would be entered, which requires action to be initiated within 1 hour, to be in HOT STANDBY (equivalent to ITS MODE 2) within the next 6 hours, to be in HOT SHUTDOWN (equivalent to ITS MODE 3) within the following 6 hours, and to be in COLD SHUTDOWN (equivalent to ITS MODE 5) within the subsequent 36 hours. However, since the RCP only has to be in operation when a reduction in boron concentration is being made, the CTS 3.0.c requirement does not provide any relevant compensatory measures (i.e., it does not require boron concentration reductions to be suspended). ITS 3.4.5 ACTION C specifies the Required Actions for a required RCS loop not in operation as immediately placing the Rod Control System in a condition incapable of rod withdrawal, immediate suspension of operations that would cause introduction of coolant into the RCS with a boron concentration less than required to meet the SDM of LCO 3.1.1 and initiation of action to restore one RCS loop to operation. This changes the CTS by adding a new ACTION.	3.4.5 ACTION C	None
3.4.5 M04	CTS 3.1.a.1.A requires one RCP to be in operation under certain conditions, but does not provide a Surveillance Requirement to periodically verify the RCP is in operation. This changes the CTS by adding a new Surveillance Requirement.	SR 3.4.5.1	3.1.a.1.A
3.4.6 M01	CTS 3.1.a.1.A, which requires a reactor coolant pump (RCP) or residual heat removal (RHR) pump to be in operation, is applicable in MODE 4 only when a reduction is made in the boron concentration of the reactor coolant. ITS 3.4.6 is applicable at all times when in MODE 4, except for ≤ 1 hour per 8 hour period provided a) no operations are permitted that would cause introduction of coolant into the RCS with boron concentration less than required to meet the SDM of LCO 3.1.1; and b) core outlet temperature is maintained at least 10ºF below saturation temperature (ITS 3.4.6 LCO Note). This changes the CTS by specifying that the LCO requirement for an RCP or RHR pump to be in operation is applicable in MODE 4 at all times except for those conditions specified in ITS 3.4.6 LCO Note.	LCO 3.4.6 Note	3.1.a.1.A

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.6 M02	CTS 3.1.a.2.A requires that if less than the required number of heat sinks are OPERABLE (i.e., one or both of the required heat sinks are inoperable), then corrective action shall be taken immediately to restore the minimum number to OPERABLE status. ITS 3.4.6 ACTION A provides the actions when one required heat sink is inoperable and ITS 3.4.6 ACTION B provides the actions when both required heat sinks are inoperable. Both ACTIONS require immediate action to be taken to restore the inoperable loops to OPERABLE status. In addition, ITS 3.4.6 Required Action A.2 requires that the unit be placed in MODE 5 in 24 hours if the inoperable loop is an RHR loop. A Note for Required Action A.2 states that this action is only required if an RHR loop is OPERABLE. Furthermore, ITS 3.4.6 Required Action B.1 requires immediate suspension of operations that would cause introduction of coolant into the RCS with boron concentration less than required to meet SDM of LCO 3.1.1. This changes the CTS by adding new Required Actions when one or both required loops are inoperable.	3.4.6 ACTION A, 3.4.6 ACTION B	3.1.a.2.A
3.4.6 M03	CTS 3.1.a.1.A does not contain any ACTIONS to take should there be less than the required number of RHR pumps in operation while in MODE 4. As a result, CTS 3.0.c would be entered, which requires action to be initiated within 1 hour, to be in HOT STANDBY (equivalent to ITS MODE 2) within the next 6 hours, to be in HOT SHUTDOWN (equivalent to ITS MODE 3) within the following 6 hours, and to be in COLD SHUTDOWN (equivalent to ITS MODE 5) within the subsequent 36 hours. However, since the RCP or RHR pump only has to be in operation when a reduction in boron concentration is being made, the CTS 3.0.c requirement does not really provide any relevant compensatory measures; i.e., it does not require boron concentration reductions to be suspended. ITS 3.4.6 ACTION B specifies the Required Actions for a required RCS or RHR loop not in operation, and requires immediate suspension of operations that would cause introduction of coolant into the RCS with a boron concentration less than required to meet the SDM of LCO 3.1.1 and initiation of action to restore one RCS or RHR loop to operation. This changes the CTS by adding a new ACTION.	3.4.6 ACTION B	3.1.a.1.A

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.6 M04	CTS 3.1.a.1.A requires one RCP or RHR pump to be in operation under certain conditions, but does not provide a Surveillance Requirement to periodically verify the required pump is in operation. ITS SR 3.4.6.1 requires verification that the required RHR or RCS loop is in operation every 12 hours. This changes the CTS by adding a new Surveillance Requirement.	SR 3.4.6.1	3.1.a.1.A
3.4.6 M05	CTS 3.1.a.2.A requires two heat sinks to be OPERABLE, but does not provide any Surveillance Requirements to periodically verify the required loops are OPERABLE. ITS SR 3.4.6.2 requires verification of steam generator secondary side water levels are ≥ 5% for required RCS loops every 12 hours. ITS SR 3.4.6.3 requires verification that each required pump is OPERABLE every 7 days by verifying correct breaker alignment and indicated power are available to each required pump. A Note further explains that the Surveillance is not required to be performed until 24 hours after a required pump is not in operation. This changes the CTS by adding new Surveillance Requirements to periodically verify the RCS or RHR loops are OPERABLE.	SR 3.4.6.2, SR 3.4.6.3	3.1.a.2.A
3.4.7 M01	CTS 3.1.a.1.A, which (in MODE 5) requires a residual heat removal (RHR) pump to be in operation, is applicable in MODE 5 only when a reduction is made in the boron concentration of the reactor coolant. ITS 3.4.7, in part, requires an RHR loop to be in operation and is applicable at all times when in MODE 5 with the RCS loops filled, except as allowed in LCO Notes 1 and 4. Note 1 allows the required RHR pump to not be in operation for ≤ 1 hour per 8 hour period provided a) no operations are permitted that would cause introduction of coolant into the RCS with boron concentration less than required to meet the SDM of LCO 3.1.1; and b) core outlet temperature is maintained at least 10°F below saturation temperature. Note 4 allows the required RHR pump to not be in operation during planned heatup to MODE 4 when at least one RCS loop is in operation. This changes the CTS by specifying that the LCO requirement for an RHR pump to be in operation is applicable in MODE 5 with the RCS loops filled at all times except for those conditions specified in ITS 3.4.7 LCO Notes 1 and 4.	LCO 3.4.7 Note 1	3.1.a.1.A

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.7 M02	CTS 3.1.a.1.A does not contain any ACTIONS to take should there be less than the required number of RHR pumps in operation while in MODE 5. As a result, CTS 3.0.c would be normally entered. However, LCO 3.0.c states that it is not applicable in COLD SHUTDOWN or REFUELING. Since the RHR pump only has to be in operation when a reduction in boron concentration is being made, and for this Specification, the unit is already in MODE 5, the CTS does not provide any compensatory measures. Therefore, 10 CFR 50.36(c)(2)(i) would apply, which states to shutdown the unit. However, no times are provided to complete the shutdown and no further actions (i.e., suspend boron concentration reduction) are required. ITS 3.4.7 ACTION C specifies the Required Actions for a required RHR loop not in operation, and requires immediate suspension of operations that would cause introduction of coolant into the RCS with a boron concentration less than required to meet the SDM of LCO 3.1.1 and initiation of action to restore one RHR loop to operation. This changes the CTS by adding a new ACTION when the required RHR pump is not in operation.	3.4.7 ACTION C	3.1.a.1.A
3.4.7 M03	CTS 3.1.a.2.B does not contain any ACTIONS to take if both required RHR loops are inoperable. As a result, CTS 3.0.c would be normally entered. However, LCO 3.0.c states that it is not applicable in COLD SHUTDOWN or REFUELING. Since the RHR pump only has to be in operation when a reduction in boron concentration is being made, and for this Specification, the unit is already in MODE 5, the CTS does not provide any compensatory measures. Therefore, 10 CFR 50.36(c)(2)(i) would apply, which states to shutdown the unit. However, no times are provided to complete the shutdown and no further actions (i.e., suspend boron concentration reductions) are required. ITS 3.4.7 ACTION C (ISTS 3.4.7 ACTION C) provides the Required Actions when no required loops are OPERABLE. The Required Actions are to immediately suspend operations that would cause introduction of coolant into the RCS with boron concentration less than required to meet the SDM of LCO 3.1.1 and to immediately initiate action to restore one RHR loop to OPERABLE status. This changes the CTS by adding a new ACTION when both required RHR loops are inoperable.	3.4.7 ACTION C	3.1.a.2.B

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.7 M04	CTS 3.1.a.1.A requires one RHR pump to be in operation under certain conditions, but does not provide a Surveillance Requirement to periodically verify the required pump is in operation. ITS SR 3.4.7.1 requires verification that the required RHR loop is in operation every 12 hours. CTS 3.1.a.2.B requires two RHR trains to be OPERABLE, but does not provide a Surveillance Requirement to periodically verify the required loops are OPERABLE. ITS SR 3.4.7.3 requires verification that each required RHR pump is OPERABLE every 7 days by verifying correct breaker alignment and indicated power are available to each required pump. A Note further explains that the Surveillance is not required to be performed until 24 hours after a required pump is not in operation. This changes the CTS by adding new Surveillance Requirements to periodically verify the required pump is in operation and the required pumps are OPERABLE.	SR 3.4.7.1 SR 3.4.7.3	3.1.a.1.A
3.4.8 M01	CTS 3.1.a.1.A, which (in MODE 5) requires a residual heat removal (RHR) pump to be in operation, is applicable in MODE 5 only when a reduction is made in the boron concentration of the reactor coolant. ITS 3.4.8, in part, requires an RHR loop to be in operation and is applicable at all times when in MODE 5 with the RCS loops not filled, except as allowed in LCO 3.4.8 Note. Note 1 allows the required RHR pump to not be in operation for ≤ 15 minutes when switching from one loop to the other provided a) core outlet temperature is maintained > 10°F below saturation temperature; b) no operations are permitted that would cause introduction of coolant into the RCS with boron concentration less than required to meet the SDM of LCO 3.1.1; and c) no draining operations to further reduce the RCS water volume are permitted. This changes the CTS by specifying that the LCO requirement for an RHR pump to be in operation is applicable in MODE 5 with the RCS loops not filled at all times except for those conditions specified in ITS LCO 3.4.8 Note 1.	LCO 3.4.8, LCO 3.4.8 Note 3.4.8 Applicability	3.1.a.1.A
3.4.8 M02	CTS 3.1.a.1.A does not contain any ACTIONS to take should there be less than the required number of RHR pumps in operation. As a result, CTS 3.0.c would normally be entered. However, LCO 3.0.c states that it is not applicable in COLD SHUTDOWN or REFUELING. Since the RHR pump only has to be in operation when a reduction in boron concentration is being made, and, for this Specification, the unit is already in MODE 5, the CTS does not provide any compensatory measures. Therefore, 10 CFR 50.36(c)(2)(i) would apply, which states to shutdown the unit. However, no times are provided to complete the shutdown and no further	3.4.8 ACTION B	3.1.a.1.A

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.8 M02 (continued)	actions (i.e., suspend boron concentration reductions are required. Note that while no ACTIONS are required, KPS in all likelihood would suspend dilution if this occurred. ITS 3.4.8 ACTION B specifies the Required Actions for a required RHR loop not in operation, and requires immediate suspension of operations that would cause introduction of coolant into the RCS with a boron concentration less than required to meet the SDM of LCO 3.1.1 and initiation of action to restore one RHR loop to operation. This changes the CTS by adding a new ACTION when the required RHR pump is not in operation.	3.4.8 ACTION B	3.1.a.1.A
3.4.8 M03	CTS 3.1.a.2.B does not contain any ACTIONS to take if both required RHR loops are inoperable in MODE 5. As a result, CTS 3.0.c would be entered, which requires action to be initiated within 1 hour, to be in HOT STANDBY (equivalent to ITS MODE 2) within the next 6 hours, to be in HOT SHUTDOWN (equivalent to ITS MODE 3) within the following 6 hours, and to be in COLD SHUTDOWN (equivalent to ITS MODE 5) within the subsequent 36 hours. However, since the unit is already in MODE 5, the CTS 3.0.c requirement does not really provide any relevant compensatory measures. ITS 3.4.8 ACTION B provides the Required Actions when no required RHR loops are OPERABLE. The Required Actions are to immediately suspend operations that would cause introduction of coolant into the RCS with boron concentration less than required to meet the SDM of LCO 3.1.1 and to immediately initiate action to restore one RHR loop to OPERABLE status. This changes the CTS by adding a new ACTION when both required RHR loops are inoperable.	3.4.8 ACTION B	3.1.a.2.B
3.4.8 M04	CTS 3.1.a.1.A requires one RHR pump to be in operation under certain conditions, but does not provide a Surveillance Requirement to periodically verify the required pump is in operation. ITS SR 3.4.8.1 requires verification that the required RHR loop is in operation every 12 hours. CTS 3.1.a.2.B requires two RHR trains to be OPERABLE, but does not provide a Surveillance Requirement to periodically verify the required loops are OPERABLE. ITS SR 3.4.8.2 requires verification that each required RHR pump is OPERABLE every 7 days by verifying correct breaker alignment and indicated power are available to each required pump. A Note further explains that the Surveillance is notrequired to be performed until 24 hours after a required pump is not in operation. This changes the CTS by adding new Surveillance Requirements to periodically verify the required pump is in operation and the required pumps are OPERABLE.	SR 3.4.8.1, SR 3.4.8.2	3.1.a.1.A, 3.1.a.2.B

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.9 M01	CTS 3.1.f requires that the reactor remain subcritical by at least 1% $\Delta k/k$ (ITS MODES 1 and 2) until normal water level is established in the pressurizer. ITS 3.4.9 requires, in part, that the pressurizer water level is ≤ 90% not only in MODES 1 and 2, but also in MODE 3. Due to this new Applicability, when the pressurizer water level is not within the limit, ITS 3.4.9 Required Action A.4 will also require the unit to be taken to MODE 4 within 12 hours, which is outside the new MODE of Applicability. This changes the CTS by adding a new MODE of Applicability (MODE 3) and a commensurate Required Action.	3.4.9 ACTION A	3.1.f
3.4.9 M02	CTS 3.1.f requires the pressurizer water level to be within the "normal water level." In addition, the CTS does not provide any Surveillance Requirement to periodically verify the pressurizer water level. The CTS Bases states that the requirement that the pressurizer is partly voided ensures that the RCS will not be solid when criticality is achieved. ITS LCO 3.4.9.a requires the pressurizer level to be ≤ 90%. Furthermore, ITS SR 3.4.9.1 requires verification that the pressurizer water level is ≤ 90% every 12 hours. This changes the CTS by specifically stating the value for the normal water level (≤ 90%) and providing a periodic verification that the level is within the limit.	LCO 3.4.9.a, SR 3.4.9.1	3.1.f
3.4.9 M03	CTS 3.1.f does not provide any ACTIONS to be taken when the required pressurizer water level is not met when the reactor is not subcritical by at least 1% $\Delta k/k$. As a result, LCO 3.0.c would be entered, which requires action to be initiated within 1 hour, to be in HOT STANDBY (equivalent to ITS MODE 2) within the next 6 hours and to be in HOT SHUTDOWN (equivalent to ITS MODE 3) with the following 6 hours. Under similar conditions, ITS 3.4.9 ACTION A requires the unit to be in MODE 3 within 6 hours (Required Action A.1), to fully insert all rods in 6 hours (Required Action A.2), and to place the Rod Control System in a condition incapable of rod withdrawal in 6 hours (Required Action A.3). This changes the CTS by providing specific Required Actions to take when the pressurizer water level is not within limits.	3.4.9 ACTION A	3.1.f

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.10 M01	CTS 3.1.a.3 requires two pressurizer safety valves to be OPERABLE, but does not specify their lift settings. ITS 3.4.10 requires two pressurizer safety valves to be OPERABLE with lift settings ≥ 2410.45 psig and ≤ 2559.55 psig. Commensurate with the addition of the lift settings, a Note has been added to the Applicability. The Note states that the lift settings are not required to be within the LCO limits during MODE 3 and 4 for the purpose of setting the pressurizer safety valves under ambient (hot) conditions. Additionally, the Note states that this exception is allowed for 36 hours following entry into MODE 3 provided a preliminary cold setting was made prior to heatup. Furthermore, a Surveillance Requirement (SR 3.4.10.1) has been added to verify that each pressurizer safety valve is OPERABLE in accordance with the Inservice Testing Program and that following testing the lift settings are within ± 1%. This changes the CTS by requiring the pressurizer safety valves to be OPERABLE within specific lift settings, except as allowed in the Applicability Note, and by adding a Surveillance Requirement to ensure the lift settings requirements are met.	LCO 3.4.10, SR 3.4.10.1	3.1.a.3
3.4.10 M02	CTS 3.1.a.3 ACTION A states that with one pressurizer safety valve inoperable to restore the inoperable valve to OPERABLE status within 15 minutes or be in HOT SHUTDOWN (equivalent to ITS MODE 3) within 12 hours. ITS 3.4.10 ACTION B, which provides the ACTION when one pressurizer safety valve is inoperable and has not been restored to OPERABLE status within 15 minutes, requires the unit to be in MODE 3 within 6 hours and MODE 4 with any RCS cold leg temperatures ≤ the LTOP arming temperature specified in the PTLR within 36 hours. This changes CTS by requiring the unit to be in MODE 3 within 6 hours instead of 12 hours and by further requiring the unit to be in MODE 5 within 36 hours.	3.4.10 ACTION B	3.1.a.3 ACTION A
3.4.10 M03	CTS 3.1.a.3 ACTION B states that with two pressurizer safety valve inoperable to restore one inoperable valve to OPERABLE status within 15 minutes or be in a condition with the LTOP system OPERABLE or reactor head removed within 48 hours. ITS 3.4.10 ACTION B, which provides the ACTION when two pressurizer safety valves are inoperable, requires the unit to be in MODE 3 within 6 hours and MODE 5 within 36 hours. This changes CTS by not providing a short restoration time for one of the pressurizer safety valves since it is redundant to the time provided in ITS 3.4.10 ACTION A and by requiring the unit to be in MODE 3 within 6 hours and MODE 5 within 36 hours.	3.4.10 ACTION B	3.1.A.3 ACTION B

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.11 M01	CTS 3.1.a.5.A requires the PORVs and associated block valves to be OPERABLE in the OPERATING (equivalent to ITS MODE 1) and HOT STANDBY (equivalent to ITS MODE 2) modes. Furthermore, when a unit shutdown is required by CTS 3.1.a.5.A, the unit is required to be shut down to HOT SHUTDOWN (equivalent to ITS MODE 3). ITS 3.4.11 requires the PORVs and associated block valves to be OPERABLE in MODES 1, 2, and 3. Consistent with the change in Applicability, the requirement to be in MODE 4 within 12 hours is added to all cases where a unit shutdown is required as indicated in Required Actions D.2, E.4, and G.2. This changes the CTS by requiring the PORVs and associated block valves to be OPERABLE in MODE 3 and providing a Required Action to place the unit outside the Applicability.	3.4.11 Applicability 3.4.11 ACTION D, 3.4.11 ACTION E, 3.4.11 ACTION G	3.1.a.5.A
3.4.11 M02	When a unit shutdown is required by CTS 3.1.a.5.A.1, 3.1.a.5.A.2, 3.1.a.5.A.3, 3.1.a.5.A.4, or 3.1.a.5.A.5, the unit is required to be in HOT STANDBY (equivalent to ITS MODE 2) in 6 hours and HOT SHUTDOWN (equivalent to ITS MODE 3) in the following 6 hours. Under similar conditions in the ITS, the unit is required to be in MODE 3 in 6 hours and in MODE 4 in 12 hours. This changes the CTS by requiring the unit to be in MODE 3 in 6 hours in lieu of the current 12 hour time.	3.4.11 ACTION D	3.1.a.5.A.1, 3.1.a.5.A.2, 3.1.a.5.A.3, 3.1.a.5.A.4 3.1.a.5.A.5
3.4.12 M01	CTS 3.1.b.4.A states, in part, that the overpressure relief valve shall be aligned to the RCS by maintaining valves RHR 1A, 1B, 2A, and 2B open. However, the CTS does not provide any Surveillance Requirement to periodically verify this alignment. ITS SR 3.4.12.1 requires verification that the RHR suction valves are open for each RHR suction flow path every 12 hours. This changes the CTS by requiring verification that the RHR suction valves are open for each RHR suction flow path every 12 hours.	SR 3.4.12.1	3.1.b.4.A
3.4.14 M01	CTS 3.1.a.4.A requires the RCS PIVs to be OPERABLE in the OPERATING (equivalent to ITS MODE 1) and HOT STANDBY (equivalent to ITS MODE 2) MODES. ITS 3.4.14 requires the RCS PIVs to be OPERABLE in MODES 1, 2, 3, and 4, except valves in the Residual Heat Removal (RHR) System flow path when in, or during the transition to or from, the RHR mode of operation. This changes the CTS by requiring the RCS PIVs to be OPERABLE in MODES 3 and 4 (except valves in the Residual Heat Removal (RHR) System flow path when in, or during the transition to or from, the RHR mode of operation).	3.4.14 Applicability	3.1.b.4.A

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.14 M02	CTS 4.2.a.3.a requires periodic leakage testing of each RCS PIV prior to entering the OPERATING mode (equivalent to ITS MODE1). ITS SR 3.4.14.1, which performs similar leakage testing, requires the testing to be performed prior to entering MODES 1 and 2 (i.e., the Note to the SR states it is required to be performed in MODES 1 and 2, which means that it has to be current prior to entering those MODES). This changes the CTS by requiring the RCS PIV leakage testing Surveillance to be current prior to entering MODE 2, in lieu of prior to entering MODE 1.	SR 3.4.14.1	4.2.a.3.a
3.4.14 M03	CTS 4.5.b.2.F requires testing the RHR System valve interlocks once per operating cycle. ITS SR 3.4.14.2 requires a similar test, but includes the specific method for performing the test (using a simulated or actual RCS pressure signal) and the actual pressure value the interlocks must function (≥ 450 psig). This changes the CTS by adding the specific method and setpoint for the RHR System interlock function Surveillance.	SR 3.4.14.2	4.5.b.2.F
3.4.15 M01	The CTS Applicability of the RCS leak detection system is when the reactor is critical and above 2% power (equivalent to ITS MODE 1 and part of MODE 2). ITS 3.4.15 requires the RCS leakage detection instrumentation to be OPERABLE in MODES 1, 2, 3, and 4. This changes the CTS by requiring the RCS leak detection instrumentation to be OPERABLE in more MODES in ITS than in CTS.	3.4.15 Applicability	3.1.d.4
3.4.15 M02	Not used.		
3.4.15 M03	CTS 3.1.d.4 does not contain any ACTIONS to take if one of the required RCS leakage detection instruments are inoperable and not restored within the allowed Completion Time. As a result, CTS 3.0.c would be entered, which requires action to be initiated within 1 hour and to be in HOT STANDBY (equivalent to ITS MODE 2) within the next 6 hours. ITS 3.4.15 ACTION C states that if the Required Action and associated Completion Time of ACTIONS A or B are not met, then the unit must be in MODE 3 in 6 hours and in MODE 5 in 36 hours. This changes the CTS by adding a specific shutdown action.	3.4.15 ACTION C	3.1.d.4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.15 M04	Item 19 of CTS Table TS 4.1-1 requires a Daily instrument check of the radiation monitoring system. ITS SR 3.4.15.1 requires the performance of a CHANNEL CHECK of the required containment radioactivity monitor every 12 hours. This changes the CTS by requiring a check of the required containment radioactivity monitor more often in ITS than in CTS.	SR 3.4.15.1	Table TS 4.1-1 Channel Description 19
3.4.16 M01	CTS 3.1.c.2 essentially requires that the specific activity of the reactor coolant shall be limited whenever the reactor is critical or the average coolant temperature is > 500°F. ITS 3.4.16 Applicability, with TSTF-490-A incorporated, requires the RCS DOSE EQUIVALENT I-131 and RCS DOSE EQUIVALENT XE-133 specific activity to be within limits during MODES 1, 2, 3 and 4. In addition, when a unit shutdown is required by CTS 3.1.c.2.A and CTS 3.1.c.2.B, the CTS requires the unit to be in INTERMEDIATE SHUTDOWN with an average coolant temperature of < 500°F within 6 hours. ITS 3.4.16 Required Action C.1 requires the unit to be in MODE 3 within 6 hours and Required Action C.2 requires the unit to be in MODE 5 within 36 hours. This changes the CTS by applying the LCO in more MODES in ITS than in CTS and by adding commensurate Required Actions to exit the new Applicability.	3.4.16 Applicability, 3.4.16 ACTION C	3.1.c.2
3.4.16 M02	CTS Table TS 4.1-2 Item 1.b requires the performance of a DOSE EQUIVALENT I-131 concentration test of the reactor coolant sample every 14 days when in the OPERATING MODE (i.e., ITS MODE 1). ITS SR 3.4.16.2 requires verification of reactor coolant DOSE EQUIVALENT I-131 specific activity be ≤ 1.0 µCi/gm every 14 days and between 2 and 6 hours after a THERMAL POWER change of ≥ 15% RTP within a 1 hour period. This changes the CTS by adding a new conditional Surveillance Requirement Frequency and deleting the allowance to only perform the 14 day routine Surveillance when in MODE 1.	SR 3.4.16.2	Table TS 4.1-2 Item 1.b, including footnote (2)
3.5.1 M01	CTS 3.3.a.1 states, in part, that the accumulators are not required to be OPERABLE during LOW POWER PHYSICS TESTING. ITS 3.5.1 does not include this exception; the accumulators are required during PHYSICS TESTS. This changes the CTS by requiring the accumulators to be OPERABLE during PHYSICS TESTS.	None	3.3.a.1

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5.1 M02	CTS 3.3.a.1 requires the accumulators to be OPERABLE when the reactor is critical. In addition, CTS 3.3.a.2 provides actions when the accumulators are inoperable during power operation or recovery from an inadvertent trip. ITS 3.5.1 is applicable in MODES 1 and 2 and MODE 3 with RCS pressure > 1000 psig. Thus, ITS 3.5.1 ACTIONS A and B must be entered if an accumulator is inoperable in MODES 1 and 2 and MODE 3 with RCS pressure > 1000 psig. In addition, ITS 3.5.1 Required Action C.2 requires reducing RCS pressure to $\leq$ 1000 psig within 12 hours when a unit shutdown is required. This changes the CTS by adding a new MODE of Applicability (MODE 3 with RCS pressure > 1000 psig) and commensurate ACTIONS to cover this new Applicability.	3.5.1 Applicability, 3.5.1 ACTIONS A	3.3.a.1, 3.3.a.2
3.5.1 M03	CTS 3.3.a.1.B requires that the accumulator isolation valves are open, but does not provide a Surveillance Requirement to periodically verify this requirement is met. ITS SR 3.5.1.1 requires verification that each accumulator isolation valve is fully open every 12 hours. CTS 3.3.a.1.B requires that the accumulator isolation valves have the power breaker locked out at or before the RCS pressure exceeds 1000 psig, but does not provide a Surveillance Requirement to periodically verify this requirement is met. ITS SR 3.5.1.5 requires verification that the motive power is removed from each accumulator isolation valve operator when RCS pressure is $\geq$ 1000 psig every 31 days. This changes the CTS by adding specific Surveillances to periodically verify these requirements are met.	SR 3.5.1.1	3.3.a.1.B
3.5.1 M04	CTS 3.3.a.2, in part, requires that if the accumulator's actions of CTS 3.3.a.2.A or CTS 3.3.a.2.B are not met, then within 1 hour, initiate action to achieve HOT STANDBY within the next 6 hours and HOT SHUTDOWN within the following 6 hours. ITS 3.5.1 Required Action C.1 requires that the unit be in MODE 3 (equivalent to CTS HOT SHUTDOWN) within 6 hours. This deletes the requirement to be in HOT STANDBY (equivalent to ITS MODE 2) within 6 hours and changes the time required to be in MODE 3 from 12 hours to 6 hours.	3.5.1 ACTION C	3.3.a.2

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5.1 M05	CTS 3.3.a.1.A provides a minimum boron concentration requirement and minimum nitrogen cover pressure for the accumulators, but does not provide a maximum limit. Furthermore, CTS 3.3.a.2.A provides the action when the minimum boron concentration limit is not met. ITS SR 3.5.1.3 provides a new maximum nitrogen cover pressure limit of 775 psig and ITS SR 3.5.1.4 provides a new maximum boron concentration limit of 2625 ppm for the accumulators. In addition, ITS 3.5.1 ACTION A provides a 72 hour time to restore the boron concentration to within limits, and applies when the maximum boron concentration is not met. This changes the CTS by adding a new maximum nitrogen cover pressure and a maximum boron concentration limit (including an ACTION) for the accumulators.	3.5.1 ACTION A, SR 3.5.1.3, SR 3.5.1.4	3.3.a.1.A, 3.3.a.2.A
3.5.1 M06	CTS Table TS 4.1-2 Sampling Test 5 requires the performance of a Sampling Test of the accumulator boron concentration monthly. ITS SR 3.5.1.4 requires a similar verification of the accumulator boron concentration every 31 days, but also requires the verification once within 6 hours after each solution volume increase of > 15% of indicated level that is not the result of addition from the refueling water storage tank (as specified in the second Frequency). The ITS SR 3.5.1.4 second Frequency also includes a Note that states the additional sampling is only required to be performed for affected accumulators. This changes the CTS by adding a new Surveillance Requirement Frequency.	SR 3.5.1.4	Table TS 4.1-2 Sampling Test 5
3.5.2 M01	The CTS 3.3.b Applicability of the Emergency Core Cooling System (ECCS) is that the reactor shall not be made critical unless two SI/RHR trains are OPERABLE. In the ITS, this is MODES 1 and 2. In addition, CTS 3.3.b.2 provides actions when an ECCS train is inoperable during power operation or recovery from an inadvertent trip. ITS 3.5.2 requires the ECCS to be OPERABLE in MODES 1, 2, and 3. Thus, ITS 3.5.2 ACTION A must be entered if an ECCS train is inoperable in MODE 1, 2, or 3. This changes the CTS by requiring the ECCS to be OPERABLE in MODE 3 and requiring the actions to be taken in MODE 3.	3.5.2 Applicability, 3.5.2 ACTION A	3.3.b
3.5.2 M02	CTS 3.3.b.1 states, in part, that the ECCS is not required to be OPERABLE during LOW POWER PHYSICS TESTS. ITS 3.5.2 does not include this exception; the ECCS is required during PHYSICS TESTS. This changes the CTS by requiring the ECCS to be OPERABLE during PHYSICS TESTS.	None	3.3.b.1

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5.2 M03	CTS 3.3.b.2.A requires that if the Safety Injection System is not restored to OPERABLE status within 72 hours, then, within 1 hour, initiate action to achieve HOT STANDBY within 6 hours and achieve HOT SHUTDOWN within the following 6 hours. CTS 3.3.b.2.B requires that if the Residual Heat Removal System is not restored to OPERABLE status within 72 hours, then, within 1 hour, initiate action to achieve HOT STANDBY within 6 hours, achieve HOT SHUTDOWN within the following 6 hours, and achieve and maintain the RCS Tavg < 350ºF by use of alternate methods within an additional 36 hours. ITS 3.5.2 Required Action B.1 requires that the unit be in MODE 3 (equivalent to CTS HOT SHUTDOWN) within 6 hours and in MODE 4 (equivalent to CTS RCS Tavg < 350ºF) within 12 hours. This change deletes the requirement to be in HOT STANDBY (equivalent to ITS MODE 2) within 6 hours, changes the time required to be in HOT SHUTDOWN (equivalent to ITS MODE 3) from 13 hours to 6 hours, and changes the time to reduce RCS temperature to < 350ºF (equivalent to ITS MODE 4) from 48 hours to 12 hours.	3.5.2 ACTION B	3.3.b.2.A, 3.3.b.2.B
3.5.2 M04	CTS 4.5.b.1.A requires the safety injection and residual heat removal pumps be started and operated quarterly during power operation and within 1 week after the plant is returned to power operation, if the test was not performed during plant shutdown. CTS 4.5.b.1.B states, in part, that an acceptable level of performance is demonstrated by the pump's ability to develop a head within an acceptable range. ITS SR 3.5.2.4 requires verification that each ECCS pump's developed head at the test flow point is greater than or equal to the required developed head. This changes the CTS by requiring that the developed head is greater than or equal to the required developed head.	SR 3.5.2.4	4.5.b.1.A, 4.5.b.1.B

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5.2 M05	CTS 4.5 does not provide a Surveillance Requirement to verify the valves listed in CTS 3.3.b.1.B are in the required condition. The ITS adds a Surveillance Requirement (SR 3.5.2.1) to verify the valves are in the proper position with motive power to the valve operator removed once every 12 hours. CTS 4.5 does not provide a Surveillance Requirement to verify each ECCS manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position. The ITS adds a Surveillance Requirement (SR 3.5.2.2) to verify each ECCS manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position once every 31 days. CTS 4.5 does not provide a Surveillance Requirement to verify each ECCS throttle valve has its position stop in the correct position. The ITS adds a Surveillance Requirement (SR 3.5.2.7) to verify each ECCS throttle valve has its position stop in the correct position once every 18 months. CTS 4.5 does not provide a Surveillance Requirement to verify the containment sump strainer inlet is not restricted by debris and the debris interceptors and strainer show no evidence of structural distress or abnormal corrosion. The ITS adds a Surveillance Requirement (SR 3.5.2.8) to verify, by visual inspection, the containment sump strainer inlet is not restricted by debris and the debris interceptors and strainer show no evidence of structural distress or abnormal corrosion once every 18 months. This changes the CTS by adding new Surveillance Requirements to the Technical Specifications.	SR 3.5.2.1, SR 3.5.2.2, SR 3.5.2.7, SR 3.5.2.8	None
3.5.3 M01	The CTS does not have any requirements for the Emergency Core Cooling Systems (ECCS) - Shutdown to be OPERABLE. ITS 3.5.3 requires one ECCS train to be OPERABLE in MODE 4. This changes the CTS by incorporating the requirements of ISTS 3.5.3. The ITS also provides Actions when one or both ECCS subsystems (Safety Injection and Residual Heat Removal) are inoperable (ACTIONS A, B, and C) and a Surveillance Requirement (SR 3.5.3.1).	3.5.3	NA

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5.4 M01	CTS 3.3.b.3 requires the refueling water storage tank (RWST) to be OPERABLE when the reactor is critical (ITS MODES 1 and 2). In addition, CTS 3.3.b.4 provides actions when the RWST is inoperable during power operation or recovery from an inadvertent trip. ITS 3.5.4 requires the RWST to be OPERABLE in MODES 1, 2, 3, and 4. Thus, ITS 3.5.4 ACTIONS A and B must be entered if the RWST is inoperable in MODE 1, 2, 3, or 4. This changes the CTS by requiring the RWST to be OPERABLE in MODES 3 and 4 and requiring the actions to be taken in MODES 3 and 4.	3.5.4 ACTION A 3.5.4 ACTION B	3.3.b.3, 3.3.b.4
3.5.4 M02	CTS 3.3.b.3 states, in part, that the RWST is not required to be OPERABLE during LOW POWER PHYSICS TESTING. ITS 3.5.4 does not include this exception; the RWST is required during PHYSICS TESTS. This changes the CTS by requiring the RWST to be OPERABLE during PHYSICS TESTS.	None	3.3.b.3
3.5.4 M03	CTS 3.3.b.3.A requires that the RWST contain at least 272,500 gallons of water, but does not provide a Surveillance Requirement to periodically verify this requirement is met. ITS SR 3.5.4.1 requires verification that the RWST water volume is $\geq$ 272,500 gallons of water every 7 days. This changes the CTS by adding a Surveillance to periodically verify this requirement is met.	SR 3.5.4.1	3.3.b.3.A
3.5.4 M04	CTS 3.3.b.4.B, in part, requires that if the RWST is not restored to OPERABILITY within the time specified, then within 1 hour initiate action to achieve HOT STANDBY within the next 6 hours, HOT SHUTDOWN within the following 6 hours and COLD SHUTDOWN within an additional 36 hours. ITS 3.5.4 Required Actions C.1 and C.2 requires the unit to be in MODE 3 (equivalent to CTS HOT SHUTDOWN) within 6 hours and MODE 5 (equivalent to CTS COLD SHUTDOWN) within 36 hours. This deletes the requirement to be in HOT STANDBY (equivalent to MODE 2) within 6 hours, and changes the time to be in MODE 3 from 12 hours to 6 hours and the time to be in COLD SHUTDOWN from 48 hours to 36 hours.	3.5.4 ACTION C	3.3.b.4.B
3.5.4 M05	CTS Table 4.1-2 Sampling Test 3 requires verification of the boron concentration in the RWST once a month. ITS SR 3.5.4.2 requires verification of the boron concentration of the RWST every 7 days. This changes the CTS by requiring that the boron concentration of the RWST is verified every 7 days instead of once per month.	SR 3.5.4.2	Table 4.1-2 Sampling Test 3

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5.4 M06	CTS 3.3.b.3.B provides a minimum boron concentration requirement for the RWST, but does not provide a maximum limit. Furthermore, CTS 3.3.b.4.A provides the action when the minimum boron concentration limit is not met. ITS SR 3.5.4.2 provides a new maximum boron concentration limit of 2625 ppm for the RWST. In addition, ITS 3.5.4 ACTION A provides an 8 hour time to restore the boron concentration to within limits, and applies when the maximum boron concentration is not met. This changes the CTS by adding a new maximum boron concentration limit (including an ACTION) for the RWST.	3.5.4 ACTION A , SR 3.5.4.2	3.3.b.3.B, 3.3.b.4.A
3.6.1 M01	CTS 3.6.a does not provide any ACTIONS to take when CONTAINMENT SYSTEM INTEGRITY is not maintained. As a result, LCO 3.0.c would be entered, which requires action to be initiated within 1 hour, to be in HOT STANDBY (equivalent to ITS MODE 2) within the next 6 hours, to be in HOT SHUTDOWN (equivalent to ITS MODE 3) with the following 6 hours, and to be in COLD SHUTDOWN (equivalent to ITS MODE 5) within the subsequent 36 hours. When the Containment is inoperable, ITS 3.6.1 ACTION A allows 1 hour to restore the Containment to OPERABLE status, and if not restored, ITS 3.6.1 ACTION B requires the unit to be in MODE 3 within 6 hours and MODE 5 within 36 hours. This changes the CTS by providing specific ACTIONS when the Containment is inoperable and by reducing the amount of time allowed to shutdown the unit to MODE 3 (from 12 hour to 6 hours) and MODE 5 (from 48 hours to 36 hours).	3.6.1 ACTIONS A and B	3.0.c

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.2 M01	CTS 3.6.a, which provides the requirements for the containment air locks, does not include any requirements for the interlock mechanisms. ITS LCO 3.6.2 states that two containment air locks shall be OPERABLE. One of the required aspects of containment air lock OPERABILITY is that the interlock mechanism, which ensures only one door in each air lock can be opened at a time, is OPERABLE. If the mechanism is inoperable, a new ACTION has been added (ITS 3.6.2 ACTION B), which requires: a) verifying an OPERABLE door is closed in the affected air lock within 1 hour; b) locking an OPERABLE door closed in the affected air lock within 24 hours; and c) verifying an OPERABLE door is locked closed in the affected air lock once per 31 days. A Note allows this specific Required Action to be met by administrative means if the air lock doors are in high radiation areas. Furthermore, ITS 3.6.2 ACTION B includes two Notes, one which states that the three Required Actions do not have to be met if both doors in the same air lock are inoperable and Condition C is entered and the second which allows entry and exit of containment under the control of a dedicated individual. Also, as Noted in ACTIONS Note 2, ITS 3.6.2 ACTION B allows separate Condition entry for each air lock (i.e., ACTION B is to be taken on a per air lock basis). If ITS 3.6.2 ACTION B is not met, then ITS 3.6.2 ACTION D must be entered, which requires a unit shutdown to MODE 3 within 6 hours and to MODE 5 within 36 hours. In addition, SR 3.6.2.2 has been added to ensure the interlock mechanism is tested every 18 months. This changes the CTS by requiring the interlock mechanism for each containment air lock to be OPERABLE, providing appropriate ACTIONS if not OPERABLE, and providing a Surveillance Requirement to periodically test the interlock mechanisms.	LCO 3.6.2 (including Applicability), 3.6.2 ACTION B, 3.6.2 ACTIONS Note 2, 3.6.2 ACTION D, SR 3.6.2.2	None
3.6.2 M02	CTS 3.6.a does not provide any ACTIONS to take when one or more air locks are inoperable due to the leakage rate limits not met (door seal leakage or overall leakage) or at least one door not closed in each air lock. As a result, LCO 3.0.c would be entered, which requires action to be initiated within 1 hour, and to be in HOT STANDBY (equivalent to ITS MODE 2) within the next 6 hours, in HOT SHUTDOWN (equivalent to ITS MODE 3) within the following 6 hours, and in COLD SHUTDOWN (equivalent to ITS MODE 5) within the subsequent 36 hours. When	3.6.2 ACTION D	3.0.c

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.2 M02 (continued)	one or more air locks are inoperable due to the leakage rate limits not met (door seal leakage or overall leakage) and not restored within the allowed Completion Time (see DOC L01), ITS 3.6.2 ACTION D requires the unit to be in MODE 3 within 6 hours and MODE 5 within 36 hours. This changes the CTS by providing specific Shutdown ACTIONS when an air lock is not restored within the allowed Completion Time and by reducing the amount of time allowed to shutdown the unit to MODE 3 (from 12 hour to 6 hours) and MODE 5 is (from 48 hours to 36 hours).	3.6.2 ACTION D	3.0.c
3.6.3 M01	CTS 3.6.b.4 provides the shutdown actions if the OPERABILITY requirements of CTS 3.6.b.3 are not met within the specified times when containment system integrity is required, and requires action to be initiated to be in HOT STANDBY (equivalent to ITS MODE 2) within the next 6 hours, in HOT SHUTDOWN (equivalent to ITS MODE 3) with the following 6 hours, and in COLD SHUTDOWN (equivalent to ITS MODE 5) within the subsequent 36 hours. Under similar conditions, ITS 3.6.3 ACTION E requires the unit to be in MODE 3 within 6 hours and MODE 5 within 36 hours. This changes the CTS by reducing the amount of time allowed to shutdown the unit to MODE 3 (from 12 hour to 6 hours) and MODE 5 (from 48 hours to 36 hours).	3.6.3 ACTION E	3.6.b.4
3.6.3 M02	CTS 4.4.f does not have a specific Surveillance to verify the isolation time of each containment isolation valve, except for the containment purge and vent valves (as shown in CTS Table 4.1-3 Equipment Test 16). ITS SR 3.6.3.5 requires verification that the isolation time of each automatic power operated containment isolation valve is within limits in accordance with the Inservice Testing (IST) Program. This changes the CTS by adding a specific Surveillance Requirement to verify the isolation time of each power operated automatic containment isolation valve.	SR 3.6.3.5	None
3.6.3 M03	CTS 4.4.f.2 only require the 2 inch containment vent isolation valves to be closed (except when the 2 inch valves are open for pressure control, ALARA, or air quality considerations for personnel entry) when the reactor is critical. ITS SR 3.6.3.2 will require the valves to be closed (except the 2 inch valves which are allowed to be open for similar reasons as in CTS 4.4.f.2) in MODES 1, 2, 3, and 4. This changes the CTS by requiring the 2 inch containment vent isolation valves to be closed (except when the 2 inch valves are open for pressure control, ALARA, or air quality considerations for personnel entry) in MODES 1, 2, 3, and 4.	SR 3.6.3.2	4.4.f.2

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.4 M01	CTS 3.6.d provides actions to be taken if the internal pressure of the reactor containment vessel exceeds 2 psi, but does not address or provide a specific minimum pressure limit. ITS LCO 3.6.4 requires the containment pressure to be $\geq$ 0.0 psig and $\leq$ 2.0 psig. This changes the CTS by requiring containment pressure be maintained greater than or equal to a minimum pressure limit.	LCO 3.6.4	None
3.6.4 M02	CTS 3.6.d does not provide any Applicability requirements for the containment pressure limit, but does provide actions to be taken if the internal pressure of the reactor containment vessel exceeds 2 psig. If the internal pressure is not restored within the limit, then the unit must be placed in the subcritical condition (equivalent to ITS MODE 3). Thus, the effective Applicability for the containment pressure limit is when the reactor is critical. ITS 3.6.4 requires the containment pressure limits to be met in MODES 1, 2, 3, and 4. Consistent with the change in Applicability, the requirement to be in MODE 5 within 36 hours is added as indicated in ITS 3.6.4 Required Action B.2. This changes the CTS by requiring the containment pressure to be within limits in MODES 3 and 4 and providing a Required Action to place the unit outside the Applicability.	3.6.4 Applicability, 3.6.4 Required Action B.2	3.6.d
3.6.4 M03	CTS 3.6.d provides the actions to be taken if the internal pressure of the reactor containment vessel exceeds 2 psig, and states, in part, that containment pressure must be returned to within limits within 8 hours. Under similar conditions, ITS 3.6.4 ACTION A requires that containment pressure be restored to within limits in one hour. This changes the CTS by decreasing the amount of time provided to restore containment pressure from 8 hours to 1 hour.	3.6.4 ACTION A	3.6.d
3.6.4 M04	CTS 3.6.d provides the actions to be taken if the internal pressure of the reactor containment vessel exceeds 2 psig, and states, in part, that when a shutdown is required to place the reactor in a subcritical condition (equivalent to ITS MODE 3). However, no finite time to complete this action is provided. Under similar conditions, ITS 3.6.4 ACTION B requires the unit to be in MODE 3 within 6 hours (Required Action B.1). This changes the CTS by providing a specific time to reach MODE 3.	3.6.4 Required Action B.1	3.6.d
3.6.4 M05	CTS 3.6.d does not provide any Surveillance Requirements for verifying containment pressure is within limits. ITS SR 3.6.4.1 requires verifying the containment pressure is within limits once per 12 hours. This changes the CTS by adding a specific Surveillance Requirement to verify the LCO limits are met.	SR 3.6.4.1	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.5 M01	CTS 3.6.e states that the reactor shall not be taken above the COLD SHUTDOWN condition unless the containment ambient temperature is > 40°F, but does not address or provide a specific maximum temperature limit. ITS LCO 3.6.5 requires the containment temperature to be ≤ 120°F. This changes the CTS by requiring containment temperature to be maintained less than or equal to a maximum temperature limit.	LCO 3.6.5	3.6.e
3.6.5 M02	CTS 3.6.e does not provide any ACTIONS to take when containment temperature is not within the specified limit. As a result, LCO 3.0.c would be entered, which requires action to be initiated within 1 hour, and to be in HOT STANDBY (equivalent to ITS MODE 2) within the next 6 hours, in HOT SHUTDOWN (equivalent to ITS MODE 3) with the following 6 hours, and in COLD SHUTDOWN (equivalent to ITS MODE 5) within the subsequent 36 hours. When the containment temperature is not within limit and not restored to within limits within the allowed Completion Time (See DOC L01), ITS 3.6.5 ACTION B requires the unit to be in MODE 3 within 6 hours and MODE 5 within 36 hours. This changes the CTS by providing specific shutdown ACTIONS when the containment air temperature is not restored to within limit and by reducing the amount of time allowed to shutdown the unit to MODE 3 (from 12 hours to 6 hours) and MODE 5 (from 48 hours to 36 hours).	3.6.5 ACTION B	3.0.c
3.6.5 M03	CTS 3.6.e does not provide any Surveillance Requirements for verifying containment temperature is within limit. ITS SR 3.6.5.1 requires verifying the containment temperature is within limit once per 24 hours. This changes the CTS by adding a specific Surveillance Requirement to verify the LCO limit is met.	SR 3.6.5.1	None
3.6.6 M01	The CTS 3.3.c.1.A Applicability of the containment spray and containment fancoil units is that the reactor shall not be made critical unless both trains of containment spray and both trains of containment fan coil units are OPERABLE. In the ITS, this is MODES 1 and 2. In addition, CTS 3.3.c.1.A.3 provides actions when the containment spray and fan coil units are inoperable during power operation or recovery from an inadvertent trip. ITS 3.6.6 requires the Containment Spray and Cooling Systems to be OPERABLE in MODES 1, 2, 3, and 4. Thus, ITS 3.6.6 ACTION A or C must be entered if a containment spray or fan coil unit is inoperable in MODES 1, 2, 3, and 4. This changes the CTS by requiring the Containment Spray and Cooling Systems to be OPERABLE in MODES 3 and 4 and adding commensurate ACTIONS to cover this new Applicability.	3.6.6 Applicability	3.3.c.1.A. 3.3.c.1.A.3

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.6 M02	CTS 3.3.c.1.A states, in part, that the containment spray and containment fancoil units are not required to be OPERABLE during LOW POWER PHYSICS TESTS. ITS 3.6.6 does not include this exception; the Containment Spray and Cooling Systems are required during PHYSICS TESTS. This changes the CTS by requiring the containment spray and containment fancoil units to be OPERABLE during PHYSICS TESTS.	None	3.3.c.1.A
3.6.6 M03	CTS 3.3.c.1.A.3 requires, in part, that if the containment spray and containment fancoil units are not returned to OPERABILITY within the time specified in CTS 3.3.c.1.A.3.(i), 3.3.c.1.A.3.(ii), or 3.3.c.1.A.3.(iii), then, within 1 hour, initiate action to achieve HOT STANDBY within 6 hours, achieve HOT SHUTDOWN within the following 6 hours, and achieve COLD SHUTDOWN within an additional 36 hours. For Containment Spray System inoperabilities, ITS 3.6.6 Required Action B.1 requires the unit be in MODE 3 (equivalent to CTS HOT SHUTDOWN) within 6 hours and Required Action B.2 requires the unit to be in MODE 5 (equivalent to COLD SHUTDOWN) within 84 hours. For Containment Cooling train inoperabilities, ITS 3.6.6 Required Action E.1 requires the unit be in MODE 3 (equivalent to CTS HOT SHUTDOWN) within 6 hours and Required Action E.2 requires the unit to be in MODE 5 (equivalent to CTS COLD SHUTDOWN) within 36 hours. This change deletes the requirement to be in HOT STANDBY (equivalent to ITS MODE 2) within 7 hours, changes the time required to be in MODE 3 from 13 hours to 6 hours, and changes the time required to be in MODE 5 (for containment fan coil units) from 48 hours to 36 hours.	3.6.6 Required Actions B.1 and E.1	3.3.c.1.A.3
3.6.6 M04	CTS 4.5.b.1.A requires the containment spray pumps be started and operated quarterly during power operation and within 1 week after the plant is returned to power operation, if the test was not performed during plant shutdown. CTS 4.5.b.1.B states, in part, that an acceptable level of performance is demonstrated by the pumps ability to develop a head within an acceptable range. ITS SR 3.6.6.4 requires verification that each containment spray pump's developed head at the test flow point is greater than or equal to the required developed head. This changes the CTS by requiring that the developed head is greater than or equal to the required developed head.	SR 3.6.6.4	4.5.b.1.A, 4.5.b.1.B

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.6 M05	CTS 4.5 does not provide a Surveillance Requirement to verify that each containment spray manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in placed is in the correct position. The ITS adds a Surveillance Requirement (SR 3.6.6.1) to verify that each containment spray manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in placed is in the correct position every 31 days. CTS 4.5 does not provide a Surveillance Requirement to operate each containment cooling train fan unit for greater than or equal to 15 minutes. The ITS adds Surveillance Requirement (SR 3.6.6.2) to operate each containment cooling train fan unit for greater than or equal to 15 minutes every 31 days. CTS 4.5 does not provide a Surveillance Requirement to verify that the containment cooling train cooling water flow rate is sufficient to remove the assumed accident heat load. The ITS adds a Surveillance Requirement (SR 3.6.6.3) to verify that the containment cooling train cooling water flow rate is sufficient to remove the assumed accident heat load every 92 days. This changes the CTS by adding new Surveillance Requirements to the Technical Specifications.	SR 3.6.6.1, SR 3.6.6.2, SR 3.6.6.3	None
3.6.7 M01	The CTS 3.3.c.2.A Applicability of the Spray Additive System is that the reactor shall not be made critical unless the system is OPERABLE. In the ITS, this is MODES 1 and 2. In addition, CTS 3.3.c.2.A.3 provides actions when the spray additive system is inoperable during power operation or recovery from an inadvertent trip. ITS 3.6.7 requires the Spray Additive System to be OPERABLE in MODES 1, 2, 3, and 4. Thus, ITS 3.6.7 ACTION A must be entered if the spray additive system is inoperable in MODES 1, 2, 3, and 4. This changes the CTS by requiring the Spray Additive System to be OPERABLE in MODES 3 and 4 and adding commensurate ACTIONS to cover the new Applicability.	3.6.7 Applicability	3.3.c.2.A, 3.3.c.2.A.3
3.6.7 M02	CTS 3.3.c.2.A states, in part, that the Spray Additive System is not required to be OPERABLE during LOW POWER PHYSICS TESTS. ITS 3.6.7 does not include this exception; the Spray Additive System is required during PHYSICS TESTS.	None	3.3.c.2.A

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.7 M03	CTS 3.3.c.2.A.3 requires, in part, that if the Spray Additive System is not returned to OPERABILITY within the 72 hours, then, within 1 hour, initiate action to achieve HOT STANDBY within 6 hours, achieve HOT SHUTDOWN within the following 6 hours, and achieve COLD SHUTDOWN within an additional 36 hours. ITS 3.6.7 Required Action B.1 requires the unit be in MODE 3 (equivalent to CTS HOT SHUTDOWN) within 6 hours and Required Action B.2 requires the unit to be in MODE 5 (equivalent to COLD SHUTDOWN) within 84 hours. This change deletes the requirement to be in HOT STANDBY (equivalent to ITS MODE 2) within 7 hours and changes the time required to be in MODE 3 from 13 hours to 6 hours. The change in the time to be in MODE 5 is discussed in DOC L02.	3.6.7 Required Action B.1	3.3.c.2.A.3
3.6.7 M04	CTS 4.5 does not provide a Surveillance Requirement to verify that each spray additive manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in placed is in the correct position. The ITS adds a Surveillance Requirement (SR 3.6.7.1) to verify that each spray additive manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in placed is in the correct position every 31 days. CTS 4.5 does not provide a Surveillance Requirement to verify the spray additive tank solution is greater than or equal to 300 gallons. The ITS adds Surveillance Requirement (SR 3.6.7.2) to verify the spray additive tank solution is greater than or equal to 300 gallons every 184 days. CTS 4.5 does not provide a Surveillance Requirement to verify that the caustic additive standpipe NaOH solution concentration is greater than or equal to 30% and less than or equal to 38% by weight. The ITS adds a Surveillance Requirement (SR 3.6.7.3) to verify that the caustic additive standpipe NaOH solution concentration is greater than or equal to 30% and less than or equal to 38% by weight every 184 days. This changes the CTS by adding new Surveillance Requirements to the Technical Specifications. Furthermore, it changes the CTS by adding an upper limit for the weight % of NaOH.	SR 3.6.7.1, SR 3.6.7.2, SR 3.6.7.3	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.8 M01	CTS 3.6.a does not provide any ACTIONS to take when the Shield Building is inoperable. As a result, LCO 3.0.c would be entered, which requires action to be initiated within 1 hour, and to be in HOT STANDBY (equivalent to ITS MODE 2) within the next 6 hours, in HOT SHUTDOWN (equivalent to ITS MODE 3) with the following 6 hours, and in COLD SHUTDOWN (equivalent to ITS MODE 5) within the subsequent 36 hours. When the Shield Building is inoperable and not restored within the allowed Completion Time (see DOC L01), ITS 3.6.8 ACTION B requires the unit to be in MODE 3 within 6 hours and MODE 5 within 36 hours. This changes the CTS by providing specific shutdown ACTIONS when the shield building is not restored to OPERABLE status and by reducing the amount of time allowed to shutdown the unit to MODE 3 (from 12 hour to 6 hours) and MODE 5 (from 48 hours to 36 hours).	3.6.8 ACTION B	3.0.c
3.6.8 M02	The CTS does not contain a Surveillance Requirement to verify one shield building access door in each access opening is closed. ITS SR 3.6.8.1 requires verification that one shield building access door in each access opening is closed every 31 days. This changes the CTS by adding a new Surveillance Requirement to the Technical Specifications.	SR 3.6.8.1	None
3.6.8 M03	CTS 4.4.c.4 states, in part, that the presence of a "measurable indicated vacuum" in the annulus serves as indication that the train under test is OPERABLE. ITS SR 3.6.8.2 requires that the shield building be maintained at a pressure ≥ 0.25 inches vacuum water gauge in the annulus. This changes the CTS by specifically stating the value for the annulus pressure (≥ 0.25 inches vacuum water gauge).	SR 3.6.8.2	4.4.c.4
3.6.8 M04	CTS 4.4.c.4 states, in part, that the shield building ventilation train must obtain equilibrium discharge conditions that demonstrate the Shield Building leakage is within acceptable limits. ITS SR 3.6.8.2 requires a final flow within the limits of Figure 3.6.8-1 after the proper vacuum has been reached within the drawdown time limit (120 seconds). This changes the CTS by specifying the actual maximum flow rate indicative of equilibrium discharge conditions.	SR 3.6.8.2	4.4.c.4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.9 M01	CTS 3.6.a does not provide any ACTIONS to take when the vacuum relief lines are inoperable. As a result, LCO 3.0.c would be entered, which requires action to be in initiated within 1 hour and to be in HOT STANDBY (equivalent to ITS MODE 2) within 6 hours, in HOT SHUTDOWN (equivalent to ITS MODE 3) within the following 6 hours, and in COLD SHUTDOWN (equivalent to ITS MODE 5) within the subsequent 36 hours. When one vacuum relief line is inoperable and not restored within the allowed Completion Time (See DOC L01), ITS 3.6.9 ACTION B requires the unit to be in MODE 3 within 6 hours and MODE 5 within 36 hours. This changes the CTS by providing specific shutdown ACTIONS when one vacuum relief line is not restored within the allowed Completion Time and by reducing the amount of time allowed to shutdown the unit to MODE 3 (from 12 hour to 6 hours) and MODE 5 (from 48 hours to 36 hours). The discussion of the change from 1 hour to 72 hours (ITS ACTION A) to restore the vacuum relief lines to OPERABLE status is provided in ITS 3.6.9 DOC L01. Note that when both vacuum relief lines are inoperable, ITS LCO 3.0.3, which is equivalent to CTS 3.0.c, would apply.	3.6.9 ACTION B	3.0.c
3.6.10 M01	If one SBVS train is not restored to OPERABLE status within 7 days, CTS 3.6.c.1 requires that the reactor must be "shut down within 12 hours." Under similar conditions, ITS 3.6.10 ACTION B requires the unit be in MODE 3 within 6 hours and in MODE 5 within 36 hours. This changes the CTS by allowing 6 hours to reach MODE 3 instead of the 12 hours allowed in the CTS. Additionally, it adds a new requirement to be in MODE 5 within 36 hours that was not required in the CTS.	3.6.10 ACTION B	3.6.c.1
3.7.1 M01	CTS 3.4.a.3 states that with one or more MSSVs inoperable, they must be returned to OPERABLE status within 48 hours or a unit shutdown is required. ITS 3.7.1 ACTION A requires that with one or more steam generators with one MSSV inoperable and the Moderator Temperature Coefficient (MTC) is zero or negative at all power levels, to reduce THERMAL POWER to ≤ 55% RTP within 4 hours. Furthermore, if there are one or more steam generators with 4 or more inoperable MSSVs, ITS 3.7.1 ACTION C will require an immediate unit shutdown. No time is provided to restore the inoperable MSSVs. This changes the CTS by decreasing the amount of time provided to restore an MSSV when there are one, two, or three MSSVs per steam generator from 48 hours to 4 hours and by deleting the time allowed to restore an MSSV when there are four or five MSSVs per steam generator inoperable (i.e., reduces the time from 48 hours to 0 hours).	3.7.1 ACTION A	3.4.a.3

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.1 M02	CTS 3.4.a.3 requires that if the MSSVs are not restored to OPERABLE status within 48 hours, then, within 1 hour, initiate action to achieve HOT STANDBY (ITS MODE 2) within 6 hours, achieve HOT SHUTDOWN (ITS MODE 3) within the following 6 hours, and achieve and maintain the Reactor Coolant System temperature < 350°F (ITS MODE 4) within an additional 12 hours. However, as long as two MSSVs per steam generator are OPERABLE, only a unit shutdown to HOT SHUTDOWN is required, since CTS 3.4.a only requires two MSSVs when not critical and Reactor Coolant System temperature > 350ºF. The unit is only required to be cooled down to ≤ 350ºF when there are less than two MSSVs per steam generator. ITS 3.7.1 ACTION B provides the shutdown requirements when two or more MSSVs per steam generator are inoperable or one or more steam generators with one MSSV inoperable, and the MTC positive at any power level. ACTION B requires reducing THERMAL POWER to less than or equal to the Maximum Allowable % RTP specified in Table 3.7.1-1 for the number of OPERABLE MSSVs in 4 hours and, if in MODE 1, to reduce the Power Range Neutron Flux – High reactor trip setting to less than or equal to the Maximum Allowable % RTP specified in Table 3.7.1-1 for the number of OPERABLE MSSVs. ITS 3.7.1 ACTION C provides the shutdown requirements when the Required Action and associated Completion Time is not met or when four or five MSSVs per steam generator are inoperable and not restored to OPERABLE status within the allowed time period. ITS 3.7.1 ACTION C requires the unit to be in MODE 3 (equivalent to CTS HOT SHUTDOWN) within 6 hours and to be in MODE 4 (equivalent to CTS RCS temperature < 350°F) within 12 hours. This changes the time required to be in MODE 3 from 13 hours to 6 hours, deletes the requirement to be in MODE 2 within 7 hours, and changes the time to be in MODE 4 from 25 hours to 12 hours.	3.7.1 ACTION C	3.4.a.3
3.7.1 M03	CTS 3.4.a does not provide Surveillance Requirements for testing the MSSVs nor does it specify any lift settings. ITS SR 3.7.1.1 and ITS Table 3.7.1-2 provide the testing requirements and the lift setpoints for the MSSVs. This changes the CTS by adding specific requirements for testing and maintaining OPERABLE the MSSVs.	SR 3.7.1.1, Table 3.7.1-2	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.2 M01	CTS 3.6.b.3.C.1, requires that when one MSIV is inoperable, the MSIV is restored to OPERABLE status or closed within 72 hours. CTS 3.6.b.3 allows separate condition entry for each inoperable MSIV. ITS 3.7.2 ACTION A does not include the allowance for separate Condition entry when in MODE 1. This changes the CTS by eliminating the allowance for separate Condition entry when in MODE 1.	None	3.6.b.3.C.1, 3.6.b.3
3.7.2 M02	CTS 3.6.b.3.C.1, requires that when an MSIV is inoperable, the MSIV is restored to OPERABLE status or closed within 72 hours. ITS 3.7.2 ACTION A allows 24 hours to restore an inoperable MSIV in MODE 1. ITS 3.7.2 ACTION C allows 24 hours to close an inoperable MSIV when in MODE 2 or 3. This changes the time allowed in the CTS to restore an inoperable MSIV from 72 hours to 24 hours when in MODE 1, and changes the time to close an inoperable MSIV from 72 hours to 24 hours when in MODE 2 or 3.	3.7.2 ACTION A	3.6.b.3.C.1
3.7.2 M03	CTS 3.6.b.3.C.2, requires verification that the inoperable MSIV is isolated every 31 days. ITS 3.7.2 Required Action C.2 requires a similar verification every 7 days. This changes the CTS by requiring the verification every 7days in lieu of every 31 days.	3.7.2 Required Action C.2	3.6.b.3.C.2
3.7.2 M04	CTS 3.6.b.4, in part, requires that if the MSIV actions of CTS 3.6.b.3 are not met, then initiate action to achieve HOT STANDBY in 6 hours and HOT SHUTDOWN within the following 6 hours. Under similar conditions in MODE 1, ITS 3.7.3 ACTION B requires the unit to be in MODE 2 (equivalent to CTS HOT STANDBY) in 6 hours. Under similar conditions in MODES 2 and 3, Required Action D.1 requires the unit to be in MODE 3 (equivalent to CTS HOT SHUTDOWN) within 6 hours. For MODE 1, the CTS and ITS are the same, For MODES 2 and 3, this deletes the requirement to be in HOT STANDBY (equivalent to ITS MODE 2) within 6 hours and changes the time required to be in MODE 3 from 12 hours to 6 hours.	3.7.2 Required Action D.1	3.6.b.4
3.7.2 M05	CTS 4.7 does not include a requirement to verify that each MSIV actuates to the isolation position on an actual or simulated actuation signal. ITS SR 3.7.2.2 is being added to perform this requirement every 18 months. This changes the CTS by adding a new Surveillance Requirement.	SR 3.7.2.2	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.3 M01	CTS 3.6.b.3.A.1 allows 24 hours to isolate the affected penetration when one or more of the MFIVs are inoperable. ITS 3.7.3 ACTION D will only allow 8 hours to close or isolate the MFIV if the MFRV or MFRV bypass valve in the same line is concurrently inoperable. This changes the CTS by decreasing the time allowed to isolate the penetration when both an MFIV and a MFRV or its MFRV bypass valve in the same line are inoperable.	3.7.3 ACTION D	3.6.b.3.A.1
3.7.3 M02	CTS 3.6.b.3.A.2.a) requires a verification that the inoperable MFIV is isolated every 31 days. ITS 3.7.3 Required Action A.2 requires a similar verification every 7 days. This changes the CTS by requiring the verification every 7 days in lieu of every 31 days.	3.7.3 Required Action A.2	3.6.b.3.A.2.a)
3.7.3 M03	CTS 3.6.b.4, in part, requires that if the MFIV actions of CTS 3.6.b.3 are not met, then initiate action to achieve HOT STANDBY in 6 hours and HOT SHUTDOWN within the following 6 hours. Under similar conditions, ITS 3.7.3 Required Action E.1 requires the unit to be in MODE 3 (equivalent to CTS HOT SHUTDOWN) within 6 hours. This deletes the requirement to be in HOT STANDBY (equivalent to ITS MODE 2) within 6 hours and changes the time required to be in MODE 3 from 12 hours to 6 hours.	3.7.3 Required Action E.1	3.6.b.4
3.7.3 M04	CTS 3.6.b does not provide a Surveillance Requirement to verify the isolation time of each MFIV is within limits. The ITS adds a Surveillance Requirement (SR 3.7.3.1) to verify the isolation time of each MFIV is within limits in accordance with the Inservice Testing Program. CTS 3.6.b does not provide a Surveillance Requirement to verify each MFIV actuates to the isolation position on an actual or simulated actuation signal. The ITS adds a Surveillance Requirement (SR 3.7.3.2) to verify each MFIV actuates to the isolation position on an actual or simulated actuation signal once every 18 months. This changes the CTS by adding new Surveillance Requirements for the MFIVs.	SR 3.7.3.1, SR 3.7.3.2	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.3 M05	The CTS does not include any requirements for the Main Feedwater Regulation Valves (MFRVs) and MFRV bypass valves. ITS 3.7.3 requires the MFRVs and MFRV bypass valves to be OPERABLE in MODES 1, 2, 3 except when all MFRVs and MFRV bypass valves are closed and de-activated. Commensurate with the new LCO requirement, ACTIONS and Surveillance Requirements have also been added. ITS 3.7.3 ACTION B allows 72 hours to close or isolate the MFRV when a MFRV is inoperable, and once isolated, will require verification that the flow path remains isolated every 7 days. ITS 3.7.3 ACTION C allows 72 hours to close or isolate the MFRV bypass valve when an MFRV bypass valve is inoperable, and once isolated, will require verification that the flow path remains isolated every 7 days. If a MFRV or an MFRV bypass valve and a MFIV in the same flow path are concurrently inoperable, ITS 3.7.3 ACTION D allows 8 hours to isolate the affected flow path. ITS 3.7.3 ACTION E states that if the Required Action and associated Completion Time (i.e., of Conditions B, C, or D for MFRVs and MFRV bypass valves) is not met, be in MODE 3 in 6 hours and be in MODE 4 in 12 hours. All the ACTIONS are modified by the ACTIONS Note, which allows separate Condition entry for each valve. ITS SR 3.7.3.1 verifies the isolation time of each MFRV and MFRV bypass valve in accordance with the Inservice Testing Program. ITS SR 3.7.3.2 verifies each MFRV and MFRV bypass valve actuates to the isolation position on an actual or simulated actuation signal every 18 months. This changes the CTS by adding new MFRV and MFRV bypass valve requirements, including LCO requirements, ACTIONS, and Surveillance Requirements.	LCO 3.7.3, 3.7.3 ACTIONS B, D, and E, SR 3.7.3.1, SR 3.7.3.2	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.4 M01	The CTS does not have any requirements for the Steam Generator (SG) Power Operated Relief Valves (PORVs) to be OPERABLE. ITS 3.7.4 requires the PORVs to be OPERABLE in MODES 1, 2, and 3, and MODE 4 when steam generator is relied upon for heat removal. This changes the CTS by incorporating the requirements of ITS 3.7.4. The ITS also provides Actions when one or both SG PORVs are inoperable (ACTIONS A, B, and C) and a Surveillance Requirement (SR 3.7.4.1) to verify one complete cycle of each SG PORV in accordance with the IST Program.	3.7.4	None
3.7.5 M01	The CTS requirements on the Auxiliary Feedwater (AFW) System are applicable when the Reactor Coolant System is > 350ºF. ITS 3.7.5 is applicable in MODES 1, 2, 3, (equivalent to the CTS Applicability) and, in addition, MODE 4 when the steam generator is relied upon for heat removal. This changes the CTS by adding the MODE of Applicability requirement. To support this change in the Applicability, the following additional requirements are added to the CTS: • A Note is added to the LCO that requires only one AFW train, which includes a motor driven pump, to be OPERABLE in MODE 4; • A new ACTION F is added which requires immediate action to restore a required AFW train to OPERABLE status when the steam generator (SG) is relied upon for heat removal in MODE 4; • ITS 3.7.5 Required Action D.2 has been added to require the unit to be in MODE 4 within 18 hours whenever a unit shutdown is required; and • CTS 4.8.a, b, and c (SR 3.7.5.2 and SR 3.7.5.3) which are applicable when the Reactor Coolant System is > 350ºF, are now also applicable in MODE 4 when the SG is relied upon for heat removal for the required AFW train. • These changes are acceptable because the AFW system may be needed in MODE 4 if the residual heat removal (RHR) loop has not yet been placed in service. ITS 3.4.6, "RCS Loops – MODE 4," includes requirements for OPERABLE steam generators, thus a required AFW train must be OPERABLE to ensure the steam generators have a source of feedwater. This change is designated as more restrictive because the AFW system is now required to be OPERABLE in MODE 4 when a steam generator is relied upon for heat removal.	3.7.5 second Applicability, LCO 3.7.5 Note, 3.7.5 ACTION F, 3.7.5 Required Action D.2	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.5 M02	CTS 3.4.b.3 states that if two of the three AFW trains are inoperable, to reduce power to < 1673 MWt within 2 hours. CTS 3.4.b.4.B then continues the actions for two inoperable AFW trains and requires restoration of one of the trains within 4 hours. In the ITS, when two AFW trains are inoperable for reasons other than ITS 3.7.5 Condition C (i.e., reasons other than one turbine driven AFW train inoperable due to an inoperable steam supply concurrent with one inoperable motor driven AFW train), ITS 3.7.5 ACTION D requires a unit shutdown; no time is provided for restoration of one of the inoperable trains. This changes the CTS by requiring a unit shutdown under certain conditions when two AFW trains are inoperable.	3.7.5 ACTION D	3.4.b.3, 3.4.b.4.B
3.7.5 M03	CTS 3.4.b.6 requires that if the AFW actions of CTS 3.4.b.4 are not met, then, within 1 hour, initiate action to achieve HOT STANDBY within 6 hours, HOT SHUTDOWN within the following 6 hours, and reduce Reactor Coolant System temperature to < 350ºF within an additional 12 hours. ITS 3.7.5 ACTION D requires that the unit be in MODE 3 (equivalent to CTS HOT SHUTDOWN) within 6 hours and to be in MODE 4 (equivalent to CTS RCS temperature < 350ºF) within 18 hours. This changes the time required to be in MODE 3 from 13 hours to 6 hours, the time to be in MODE 4 from 25 hours to 18 hours, and deletes the requirement to be in MODE 2 (equivalent to CTS HOT STANDBY) within 7 hours.	3.7.5 ACTION D	3.4.b.6

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.5 M04	CTS 4.8.a requires that the motor-driven auxiliary feedwater pumps are demonstrated OPERABLE quarterly during power operation and within one week after the pumps are required to be OPERABLE by Technical Specifications, if the test surveillance interval expired during the shutdown period. CTS 4.8.b requires that the turbine-driven auxiliary feedwater pump is demonstrated OPERABLE quarterly during power operation and within 72 hours after exceeding 350°F, if the test surveillance interval expired during the shutdown period. ITS SR 3.7.5.2 requires verification that the developed head of each AFW pump at the test point is greater than or equal to the required developed head. Additionally, it allows 24 hours after the pressure in the steam generator reaches > 500 psig before the Surveillance is required to be performed for the turbine driven AFW pump. This changes the CTS by a) requiring that the developed head is greater than or equal to the required developed head for the AFW pumps; b) deleting the allowance to not require the flow test until 1 week after entering MODE 3 for the motor-driven AFW pumps; and c) decreasing the time allowed to perform the flow test of the turbine-driven AFW pump from 72 hours after entering MODE 3 to 24 hours after > 500 psig in the steam generators.	SR 3.7.5.2	4.8.a, 4.8.b
3.7.5 M05	CTS 4.8 does not provide any Surveillance Requirements for verifying that each AFW manual, power operated and automatic valve in each water flow path, and in both steam supply flow paths to the steam driven pump, that are not locked sealed or otherwise secured in position, is in the correct position. CTS 4.8 does not provide any Surveillance Requirements for verifying each AFW automatic valve that is not locked sealed or otherwise secured into position, actuates to the correct position on a actual or simulated actuation signal. CTS 4.8 does not provide any Surveillance Requirements for verifying that each AFW pump starts automatically on an actual or simulated signal. ITS SR 3.7.5.1 requires verifying that each AFW manual, power operated and automatic valve in each water flow path, and in both steam supply flow paths to the steam driven pump, that are not locked sealed or otherwise secured in position, is in the correct position every 31 days. The SR is	SR 3.7.5.1 (including Note 1), SR 3.7.5.3, SR 3.7.5.4	3.4.b.7

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.5 M05 (continued)	modified by Note 1, consistent with the allowance specified in CTS 3.4.b.7, and by Note 2, as justified in DOC L05. ITS SR 3.7.5.3 requires verifying each AFW automatic valve that is not locked, sealed or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal every 18 months. ITS SR 3.7.5.4 requires verifying that each AFW pump starts automatically on an actual or simulated signal every 18 months. The SR is modified by a Note that states the SR is not required to be performed until 24 hours after > 500 psig in the steam generator. This changes the CTS by adding new Surveillance Requirements.	SR 3.7.5.1 (including Note 1), SR 3.7.5.3, SR 3.7.5.4	3.4.b.7
3.7.6 M01	CTS 3.4.c.1 requires, in part, a minimum usable volume of 41,500 gallons of water is available in the condensate storage tanks. However, no specific Surveillance Requirement is provided to verify the volume is met. ITS SR 3.7.6.1 requires that the CSTs minimum usable volume is > 41,500 gallons every 12 hours. This changes the CTS by requiring that CSTs minimum usable volume be verified every 12 hours.	SR 3.7.6.1	
3.7.6 M02	The CTS requirement on the CSTs are applicable when the Reactor Coolant System is > 350°F. ITS 3.7.6 is Applicable in MODES 1, 2, and 3 and in addition, MODE 4 "when the steam generator is relied upon for heat removal." Consistent with this change in Applicability, the requirement to be in MODE 4 "without reliance on steam generator for heat removal" is added as indicated in ITS 3.7.6 Required Action B.2. This changes the CTS by requiring the CSTs to be OPERABLE in MODE 4 "when a SG is relied upon for heat removal."	3.7.6 second Applicability, 3.7.6 Required Action B.2	None
3.7.6 M03	CTS 3.4.c.3 requires that if the CSTs are not restored to OPERABLE status within 48 hours, then, within 1 hour, initiate action to achieve HOT STANDBY within 6 hours, achieve HOT SHUTDOWN within the following 6 hours, and to achieve and maintain the Reactor Coolant System temperature < 350°F within an additional 12 hours. ITS 3.7.6 ACTION B requires that the unit to be in MODE 3 (equivalent to CTS HOT SHUTDOWN) within 6 hours and to be in MODE 4 (equivalent to RCS temperature < 350°F), without reliance on the steam generator for heat removal within 24 hours. This changes the time required to be in MODE 3 from 13 hours to 6 hours, deletes the requirement to be in MODE 2 within 7 hours, and changes the time to be in MODE 4 from 25 hours to 24 hours.	3.7.6 ACTION B	3.4.c.3

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.7 M01	The CTS 3.3.d Applicability of the Component Cooling (CC) System is that the reactor shall not be made or maintained critical unless two CC trains are OPERABLE. In the ITS, this is MODES 1 and 2. Also, CTS 3.3.d.2 provides actions when a CC train is inoperable during power operation or recovery from an inadvertent trip. ITS 3.7.7 requires the CC System to be OPERABLE in MODES 1, 2, 3, and 4. Thus, ITS 3.7.7 ACTION A must be entered if a CC train is inoperable in MODE 1, 2, 3, or 4. In addition, when a CC train is inoperable and a unit shutdown is required, CTS 3.3.d.2 requires the unit to reduce RCS Tavg to < 350ºF (ITS equivalent MODE 4) within an additional 36 hours (after the time to reach HOT STANDBY and HOT SHUTDOWN). Consistent with the change in Applicability, the requirement to be in MODE 5 within 36 hours is added as indicated in ITS 3.7.7 Required Action B.2. This changes the CTS by requiring the CC System to be OPERABLE in MODES 3 and 4, requiring actions to be taken in MODES 3 and 4, and providing a Required Action to place the unit outside the Applicability.	3.7.7 Applicability, 3.7.5 Required Action B.2	3.3.d.1, 3.3.d.2
3.7.7 M02	Requirement to verify each CC pump starts automatically on an actual or simulated actuation signal. The ITS adds a Surveillance Requirement (SR 3.7.7.3) to verify each CC pump starts automatically on an actual or simulated actuation signal once every 18 months. This changes the CTS by adding new Surveillance Requirements for the CC System.	SR 3.7.7.1, SR 3.7.7.2, SR 3.7.7.3	None
3.7.7 M03	CTS 3.3.d.2, in part, requires that if the CC System is not restored to OPERABLE status within 72 hours, then, within 1 hour, initiate action to achieve HOT STANDBY within 6 hours and achieve HOT SHUTDOWN within the following 6 hours. ITS 3.7.7 Required Action B.1 requires that the unit be in MODE 3 (equivalent to CTS HOT SHUTDOWN) within 6 hours. This deletes the requirement to be in HOT STANDBY (equivalent to ITS MODE 2) within 7 hours and changes the time required to be in MODE 3 from 13 hours to 6 hours.	3.7.7 Required Action B.1	3.3.d.2
3.7.7 M04	CTS 3.3.d.1 states that the CC System is not required to be OPERABLE during LOW POWER PHYSICS TESTS. ITS 3.7.7 does not include this exception; the CC System is required during PHYSICS TESTS. This changes the CTS by requiring the CC System to be OPERABLE during PHYSICS TESTS.	None	3.3.d.1

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.8 M01	The CTS 3.3.e Applicability of the Service Water (SW) System is that the reactor shall not be made critical unless both SW trains are OPERABLE. In the ITS, this is MODES 1 and 2. Also, CTS 3.3.e.2 provides actions when a SW train is inoperable during power operation or recovery from an inadvertent trip. ITS 3.7.8 requires the SW System to be OPERABLE in MODES 1, 2, 3, and 4. Thus, ITS 3.7.7 ACTION A must be entered if a SW train is inoperable in MODE 1, 2, 3, or 4. In addition, when an SW train is inoperable and a unit shutdown is required, CTS 3.3.e.2 requires the unit to reduce RCS T_{avg} to < 350ºF (ITS equivalent MODE 4) within an additional 36 hours (after the time to reach HOT STANDBY and HOT SHUTDOWN). Consistent with the change in Applicability, the requirement to be in MODE 5 within 36 hours is added as indicated in ITS 3.7.8 Required Action B.2. This changes the CTS by requiring the SW System to be OPERABLE in MODES 3 and 4, requiring actions to be taken in MODES 3 and 4, and providing a Required Action to place the unit outside the Applicability.	3.7.8 Applicability, 3.7.8 Required Action B.2	3.3.e.1, 3.3.e.2
3.7.8 M02	CTS 3.3.e.2 allows 72 hours to restore an inoperable SW train to OPERABLE status. ITS 3.7.8 ACTION A has this same requirement; however two Notes have been included. The ITS 3.7.8 Required Action A.1 Note 1 requires entry into the applicable Conditions and Required Actions of LCO 3.8.1, "AC Sources- Operating," for emergency diesel generator made inoperable by SWS. The ITS 3.7.8 Required Action A.1 Note 2 requires entry into the applicable Conditions and Required Actions of LCO 3.4.6, "RCS Loops - MODE 4," for residual heat removal loop made inoperable by SWS. This changes the CTS by explicitly specifying the applicable Conditions and Required Actions of ITS LCO 3.8.1 and ITS LCO 3.4.6 that must be entered.	3.7.8 Required Action A.1 Notes 1 and 2	3.3.e.2

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.8 M03	CTS 3.3.e does not provide a Surveillance Requirement to verify each SW manual, power operated, and automatic valve in the flow path servicing safety related equipment, that is not locked, sealed, or otherwise secured in position, is in the correct position. The ITS adds a Surveillance Requirement (SR 3.7.8.1) to verify each SW manual, power operated, and automatic valve in the flow path servicing safety related equipment, that is not locked, sealed, or otherwise secured in position, is in the correct position once every 31 days. The SR is also modified by a Note clarifying that isolation of SW flow to individual components does not render the SW System inoperable. CTS 3.3.e does not provide a Surveillance Requirement to verify each SW automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal. The ITS adds a Surveillance Requirement (SR 3.7.8.2) to verify each SW automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal once every 18 months. It is modified by a Note that allows the turbine building isolation valve actuation to not be required if the valve is closed and deactivated. This allowance is consistent with CTS 3.3.e.1.A.3. CTS 3.3.e does not provide a Surveillance Requirement to verify each SW pump starts automatically on an actual or simulated actuation signal. The ITS adds a Surveillance Requirement (SR 3.7.8.3) to verify each SW pump starts automatically on an actual or simulated actuation signal once every 18 months. This changes the CTS by adding new Surveillance Requirements for the SW System.	SR 3.7.8.1, SR 3.7.8.2 (including Note, SR 3.7.8.3	3.3.e.1.A.3
3.7.8 M04	CTS 3.3.e.2, in part, requires that if one SW train is not restored to OPERABLE status within 72 hours, then, within 1 hour, initiate action to achieve HOT STANDBY within 6 hours and achieve HOT SHUTDOWN within the following 6 hours. ITS 3.7.8 Required Action B.1 requires that the unit be in MODE 3 (equivalent to CTS HOT SHUTDOWN) within 6 hours. This deletes the requirement to be in HOT STANDBY (equivalent to ITS MODE 2) within 7 hours and changes the time required to be in MODE 3 from 13 hours to 6 hours.	3.7.8 Required Action B.1	3.3.e.2
3.7.8 M05	CTS 3.3.e.1 states that the SW System is not required to be OPERABLE during LOW POWER PHYSICS TESTS. ITS 3.7.8 does not include this exception; the SW System is required during PHYSICS TESTS. This changes the CTS by requiring the SW System to be OPERABLE during PHYSICS TESTS.	None	3.3.e.1

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.8 M06	CTS Table TS 4.1-1 Channel Description 30 requires a test of the Fore Bay Water Level every refueling outage. This test is performed on the Fore Bay Water Level Trip logic and does not verify that the circulating water pump pump breakers trip; it only ensures a trip signal is sent to the breakers. ITS SR 3.7.8.5 requires verification that each Circulating Water pump breaker trips on an actual or simulated Forebay Water Level – Low Low signal. This changes the CTS by requiring verification that each Circulating Water pump breaker trips on an actual or simulated Forebay Water Level – Low Low signal.	SR 3.7.8.5	Table TS 4.1-1 Channel Description 30
3.7.9 M01	The CTS does not have any requirements for the Ultimate Heat Sink (UHS) to be OPERABLE. ITS 3.7.9 requires the UHS to be OPERABLE in MODES 1, 2, 3, and 4. This changes the CTS by incorporating the requirements of ITS 3.7.9. The ITS also provides ACTIONS when the UHS is inoperable (ACTIONS A and B) and Surveillance Requirements (SR 3.7.9.1 and SR 3.7.9.2) to verify the UHS is OPERABLE (i.e., water level and temperature within limits).	3.7.9	None
3.7.10 M01	The CTS 3.12.a Applicability of the Control Room Post-Accident Recirculation (CRPAR) System is that the reactor shall not be made critical unless both trains of the CRPAR System are OPERABLE. When one inoperable train is not restored in 7 days, CTS 3.12.b requires the reactor to be shutdown (i.e., non-critical) in 12 hours. ITS 3.7.10, in part, requires the CRPAR System to be OPERABLE in MODES 1, 2, 3, and 4. Consistent with this change in Applicability, Required Action C.2 requires the unit to be in MODE 5 within 36 hours. Furthermore, Required Action C.1 only provides 6 hours to be in MODE 3. This changes the CTS by requiring the CRPAR System to be OPERABLE in MODES 3 and 4, decreases the time to reach subcritical conditions (i.e., MODE 3) from 12 hours to 6 hours, and provides a Required Action (Required Action C.2) to place the unit outside the Applicability.	3.7.10 first Applicability, 3.7.10 Required Actions C.1 and C.2	3.12.a
3.7.10 M02	The CTS does not contain any requirements for the CRPAR System in MODES 5 and 6 and during movement of irradiated fuel assemblies. ITS 3.7.10 Applicability includes "MODES 5 and 6 and during movement of irradiated fuel assemblies." ITS 3.7.10 ACTIONS D and E provide compensatory measures when CRPAR train(s) are inoperable in MODES 5 and 6 and during movement of irradiated fuel assemblies. This changes the CTS by adding additional Applicability criteria and associated ACTIONS.	3.7.10 second Applicability	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.11 M01	The CTS does not have any requirements for the Control Room Air Conditioning (CRAC) Alternate Cooling System to be OPERABLE. ITS 3.7.11 requires two CRAC Alternate Cooling trains to be OPERABLE in MODES 1, 2, 3, 4, and during movement of irradiated fuel assemblies. The ITS also provides ACTIONS when the LCO is not met (ACTIONS A, B, C, D, E, and F) and a Surveillance Requirement (ITS SR 3.7.11.1) to verify the CRAC Alternate Cooling trains are OPERABLE. This changes the CTS by incorporating the requirements of ITS 3.7.11.	3.7.11	None
3.7.12 M01	If one ASV train is not restored to OPERABLE status within 7 days, CTS 3.6.c.2 requires that the reactor must be "shut down within 12 hours." Under similar conditions, ITS 3.7.12 ACTION B requires the unit be in MODE 3 within 6 hours and in MODE 5 within 36 hours. This changes the CTS by allowing 6 hours to reach MODE 3 instead of the 12 hours allowed in the CTS. Additionally, it adds a new requirement to be in MODE 5 within 36 hours that was not required in the CTS.	3.7.12 ACTION B	3.6.c.2
3.7.13 M01	The CTS does not have any requirements for the Spent Fuel Pool Water Level. ITS 3.7.13 requires the Spent Fuel Pool Water Level to be ≥ 23 ft over the top of the irradiated fuel assemblies seated in the storage racks, during movement of irradiated fuel assemblies in the spent fuel pool. An associated ACTION (ACTION A) is provided if the LCO is not met and an applicable Surveillance Requirement (ITS SR 3.7.13.1) has been added to verify the spent fuel pool water level is within the limit every 7 days. This changes the CTS by incorporating the requirements of ITS 3.7.13.	3.7.13	None
3.7.14 M01	CTS 5.4.a.3 does not provide any ACTIONS to take when the spent fuel pool boron concentration is not within limit. When the spent fuel pool boron concentration is not within limit, ITS 3.7.14 ACTION A requires the immediate suspension of movement of fuel assemblies in the spent fuel pool; immediate action to restore the spent fuel pool boron concentration to within limit; and, immediate action to perform a spent fuel pool verification. This changes the CTS by providing specific ACTIONS when the spent fuel pool boron concentration is not within limit.	3.7.14 ACTION A	None
3.7.14 M02	CTS Table TS 4.1-2 Sampling Test 6 requires verification of the boron concentration of the spent fuel pool once a month. ITS SR 3.7.14.1 requires verification that the spent fuel pool boron concentration is within limit every 7 days. This changes the CTS by requiring the verification of the spent fuel pool boron concentration every 7 days versus once per month.	SR 3.7.14.1	Table TS 4.1-2 Sampling Test 6

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.15 M01	CTS 5.4.c does not provide any ACTIONS to take when the spent fuel pool storage requirements are not met. When the spent fuel pool storage requirements are not met, ITS 3.7.15, ACTION A requires the immediate initiation of action to move the non-complying fuel assembly to an acceptable location. This changes the CTS by providing specific ACTIONS when the spent fuel pool storage requirements are not met.	3.7.15 ACTION A	None
3.7.15 M02	CTS 5.4.c does not provide any Surveillance Requirements for verification of the spent fuel pool storage requirements. ITS SR 3.7.15.1 requires, prior to storing the fuel assembly in the spent fuel pool, verification by administrative means of the initial enrichment and burnup of the fuel assembly in accordance with the requirements of Figure 3.7.15-1. This changes the CTS by adding a specific Surveillance Requirement to verify the LCO requirements are met.	SR 3.7.15.1	None
3.7.16 M01	The CTS 3.4.d Applicability of the Secondary Activity Limits is that the Reactor Coolant System shall not be heated > 350°F unless the DOSE EQUIVALENT Iodine-131 activity on the secondary side of the steam generators is ≤ 0.1 µCi/gram. In the ITS, this is MODES 1, 2, and 3. ITS 3.7.16 requires the specific activity of the secondary coolant to be ≤ 0.1 µCi/gram DOSE EQUIVALENT I-131 in MODES 1, 2, 3, and 4. Consistent with this change in Applicability, the requirement to be in MODE 5 within 36 hours is added as indicated in Required Action A.2. This changes the CTS by requiring the specific activity of the secondary coolant be within limit when the RCS average temperature is > 200°F and < 350°F (i.e., ITS MODE 4) and provides a Required Action to place the unit outside the Applicability.	3.7.16 Applicability, 3.7.16 Required Action A.2	3.4.d
3.7.16 M02	CTS 3.4.d.2 states that when the Reactor Coolant System temperature is greater than 350°F, the DOSE EQUIVALENT I-131 activity on the secondary side of the steam generators may exceed 0.1 µCi/gram for up to 48 hours. ITS 3.7.16 ACTION A requires a unit shutdown, no time is provided for restoration of the DOSE EQUIVALENT I-131 activity to within limit prior to requiring a unit shutdown. This changes the CTS by deleting the time allowed to restore the DOSE EQUIVALENT I-131 activity to within limit prior to requiring a unit shutdown (i.e., reduces the time from 48 hours to 0 hours).	None	3.4.d.2

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.16 M03	CTS 3.4.d.3, in part, requires that if the DOSE EQUIVALENT I-131 activity on the secondary side of the steam generators is not restored to within limit within 48 hours, then, within 1 hour, initiate action to achieve HOT STANDBY within 6 hours and HOT SHUTDOWN within the following 6 hours. Under similar conditions (i.e., secondary activity not within limit) ITS 3.7.16 Required Action A.1 requires that the unit to be in MODE 3 (equivalent to CTS HOT SHUTDOWN) within 6 hours. This changes the time required to be in MODE 3 from 13 hours to 6 hours and deletes the requirement to be in MODE 2 within 7 hours.	3.7.16 Required Action A.1	3.4.d.3
3.8.1 M01	CTS 3.7.a requires the AC sources to be OPERABLE when the reactor is critical. In addition, CTS 3.7.b provides actions when an offsite circuit and diesel generators are inoperable during power operation or recovery from an inadvertent trip. When the restoration times of CTS 3.7.b.1, 2. or 7 are not met, CTS 3.7.b requires the unit to be in HOT STANDBY (ITS MODE 2) in 6 hours. ITS LCO 3.8.1 requires the AC sources to be OPERABLE in MODES 1, 2, 3 and 4. Thus ITS 3.8.1 ACTIONS A, B and E (as applicable) must be entered if an offsite circuit or diesel generators are inoperable in MODES 1, 2, 3, and 4. This changes the CTS by requiring the AC sources to be OPERABLE in MODES 3 and 4 and commensurate ACTIONS to cover the new Applicability.	3.8.1 Applicability, 3.8.1 ACTIONS A, B, and E	3.7.a, 3.7.b
3.8.1 M02	CTS 3.7.b.1 allows one offsite circuit to be inoperable for 7 days provided one offsite circuit is OPERABLE, but does not provide any specific requirement to determine how the other offsite circuit is OPERABLE nor how often to perform the determination. CTS 3.7.b.2 covers the condition for one inoperable DG but does not provide any Surveillance Requirement to determine whether the offsite circuits are OPERABLE. ITS 3.8.1 Required Action A.1 requires the performance of SR 3.8.1.1 (the offsite circuit verification) for the OPERABLE offsite circuit within 1 hour and once per 8 hours thereafter when an offsite circuit is inoperable. ITS 3.8.1 Required Action B.1 requires the performance of SR 3.8.1.1 for the OPERABLE offsite circuit(s) within 1 hour and once per 8 hours thereafter when a DG is inoperable. This changes the CTS by adding a specific method and time to perform the offsite circuit verification when an offsite circuit or DG is inoperable.	3.8.1 Required Actions A.1 and B.1	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 M03	CTS 4.6.a.1.A, in part, requires a manual start of the DGs and CTS 4.6.a.2 requires verification of DG performance when simulating a loss of offsite power in conjunction with a safety injection signal. While CTS 4.6.a.1.A requires steady state voltage and frequency to be achieved, neither of the Surveillance Requirements specify the steady state voltage and frequency values that must be achieved by the DG. ITS SR 3.8.1.2 and ITS SR 3.8.1.16 require, in part, that each DG achieve a steady state voltage of ≥ 4000 V and ≤ 4400 V and frequency of ≥ 60.0 Hz and ≤ 60.7 Hz. This changes the CTS by providing explicit steady state voltage and frequency limits.	SR 3.8.1.2, SR 3.8.1.16	4.6.a.1.A, 4.6.a.2
3.8.1 M04	CTS 4.6.a.1.B requires each DG to be loaded and operated for at least 1 hour. ITS SR 3.8.1.3 requires a similar test; however two additional Notes have been added that place restrictions on the test. Notes 3 and 4 modify the CTS requirements by stating that the SR shall be conducted on only one DG at a time and the SR shall be preceded by and immediately follow, without a shutdown of the DG, a successful performance of ITS SR 3.8.1.2 or ITS SR 3.8.1.8. This changes the CTS by adding a restriction when performing this test.	SR 3.8.1.3 Notes 3 and 4	4.6.a.1.B
3.8.1 M05	CTS 4.6.a.2 requires verification of DG performance when simulating a loss of offsite power in conjunction with a safety injection signal. CTS 4.6.a.4 requires performance of a DG load rejection test. ITS SR 3.8.1.16 and ITS SR 3.8.1.11, respectively, require similar tests, however ITS SR 3.8.1.16 includes a Note (Note 2) and ITS SR 3.8.1.11 includes a Note (Note 1), which state the Surveillance shall not normally be performed in MODE 1, 2, 3, or 4 or MODE 1 or 2, respectively. 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 Surveillances to be performed in MODE 1, 2, 3, or 4 or MODE 1 or 2, respectively, only as long as an assessment is performed or provided that it is an unplanned event that satisfies the requirements of the SR.	SR 3.8.1.16 Note 2, SR 3.8.1.11 Note 1	4.6.a.2, 4.6.a.4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 M06	CTS 4.6.a.4 requires verification that the DG is capable of rejecting a full load. This Surveillance does not specify that a DG shall be tested at a specific power factor. ITS SR 3.8.1.11 requires a similar verification but includes a Note (Note 2) that states if the test is performed with the DG synchronized with offsite power, it shall be performed within the power factor limit (≤ 0.89), unless grid conditions otherwise dictate the power factor be maintained as close to the limit as practicable. This changes the CTS requirement by specifying a power factor limit requirement if the testing is conducted by synchronizing with the offsite sources.	SR 3.8.1.11 Note 2	4.6.a.4
3.8.1 M07	CTS 4.6.a.4 requires a DG load rejection test be performed in accordance with IEEE 387-1977, Section 6.4.5. IEEE 387-1977 specifies the DG shall be capable of rejecting the maximum rated load without exceeding speed or voltages which will cause tripping, mechanical damage, or harmful overstresses. ITS SR 3.8.1.11 requires verification that each DG can reject a load of ≥ 2860 kW without exceeding speeds or voltages that will cause tripping, mechanical damage, or harmful overstresses. This changes the CTS by including the actual load value and includes the acceptance criteria specified in IEEE 387-1977, Section 6.4.5.	SR 3.8.1.11	4.6.a.4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 M08	ITS SR 3.8.1.1 requires verification that each required offsite source is correctly aligned and indicated power is available every 7 days. ITS SR 3.8.1.5 requires that each day tank be checked for accumulated water and to remove any accumulated water every 31 days. ITS SR 3.8.1.6 requires verification that each fuel transfer system operates to automatically transfer fuel oil from the storage tank to the associated day tanks every 31 days. ITS SR 3.8.1.8 requires verification that each DG can be started from standby conditions and achieve within 10 seconds voltage > 3952 V and frequency > 59.0 Hz and achieve steady state voltage ≥ 4000 V and ≤ 4400 V and frequency ≥ 60.0 Hz and ≤ 60.7 Hz every 184 days. ITS SR 3.8.1.9 requires verification of automatic and manual transfer of unit power supply from the normal offsite circuit to the alternate offsite circuit every 18 months. ITS SR 3.8.1.10 requires verification that the frequency of each DG does not go above the specified limit during the rejection of the largest post-accident load every 18 months. ITS SR 3.8.1.12 requires the performance of a loss of offsite power initiation signal test every 18 months. ITS SR 3.8.1.14 requires a DG hot restart test every 18 months. ITS SR 3.8.1.15 requires verification that each DG can synchronize with an offsite power source while loaded with emergency loads upon a simulated restoration of offsite power, and return to ready-to-load operation every 18 months. This changes the CTS by adding these Surveillance Requirements to the Technical Specifications.	SR 3.8.1.1, SR 3.8.1.5, SR 3.8.1.6, SR 3.8.1.8, SR 3.8.1.9, SR 3.8.1.10, SR 3.8.1.12, SR 3.8.1.14, SR 3.8.1.15	None
3.8.2 M01	CTS 3.7 does not contain any explicit Action requirements for qualified circuits and diesel generators (DGs) when these AC Sources are required to support equipment required to be OPERABLE in MODES 5 and 6 and during movement of irradiated fuel assemblies. However, the CTS 1.0.e definition of OPERABLE requires that, for all equipment required to be OPERABLE, "all necessary attendant ... normal and emergency electrical power sources... that is required for the system or component to perform its intended function is also capable of performing their related support functions." Furthermore, CTS 3.7.c states, "When its normal or emergency power source is inoperable, a system, train or component may be considered OPERABLE ... provided its corresponding normal or emergency power source is OPERABLE and its redundant system, train, or component is OPERABLE." ITS 3.8.2 ACTIONS A and B have been added to cover the situation when the qualified offsite circuit or DG	3.8.2 ACTIONS A and B, 3.8.2 ACTIONS Note	3.7.c, 1.0.e

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.2 M01 (continued)	is inoperable, respectively. If the required offsite circuit is inoperable, ITS 3.8.2 ACTION A requires either the declaration that affected required feature(s) with no offsite power available are inoperable, or to suspend certain activities (movement of irradiated fuel assemblies and operations involving positive reactivity additions that could result in loss of required SDM or boron concentration) and to initiate action to restore required offsite power circuit to OPERABLE status. If the required DG is inoperable, ITS 3.8.2 ACTION B requires the immediate suspension of certain activities (movement of irradiated fuel assemblies and operations involving positive reactivity additions that could result in loss of required SDM or boron concentration) and to initiate action to restore required DG to OPERABLE status. In addition, a Note that states LCO 3.0.3 is not applicable has been added. This change adds compensatory actions for the inoperable required AC Source.	3.8.2 ACTIONS A and B, 3.8.2 ACTIONS Note	3.7.c, 1.0.e
3.8.2 M02	CTS 4.6 does not contain any specific Surveillance Requirements for qualified circuits and DGs when these AC Sources are required to support equipment required to be OPERABLE in MODES 5 and 6 and during movement of irradiated fuel assemblies. ITS SR 3.8.2.1 requires the SRs of Specification 3.8.1, except SR 3.8.1.9 and SR 3.8.1.16 to be applicable. The Surveillance includes a Note allowing certain Surveillances to not be performed to preclude requiring the OPERABLE DG from being paralleled with the offsite power network or otherwise rendered inoperable during the performance of the SR, or to preclude de-energizing a required 4.16 kV essential bus or disconnecting a required offsite circuit during performance of the SR. This changes the CTS by adding explicit Surveillances for the AC Sources required to be OPERABLE in MODES 5 and 6 and during movement of irradiated fuel assemblies.	SR 3.8.2.1	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.3 M01	CTS 3.7.a requires the diesel generators (specified in CTS 3.7.a.7), and hence, the combined underground storage tank and corresponding day tanks level to be within the limits and be tested in accordance with Table TS 4.1-3 Equipment Test 9 when the reactor is critical. ITS LCO 3.8.3 requires the stored diesel fuel oil to be within limits "when associated DG is required to be OPERABLE." ITS 3.8.1 requires both DGs to be OPERABLE in MODES 1, 2, 3, and 4 and ITS 3.8.2 requires one of the DGs to be OPERABLE in MODES 5 and 6 and during movement of irradiated fuel assemblies. This changes the CTS by adding requirements specifying the stored diesel fuel oil limit to be met for both DGs in MODES 3 and 4 and in MODE 2 when the reactor is not critical and for one DG in MODES 5 and 6 and during movement of irradiated fuel assemblies.	LCO 3.8.3, including Applicability	3.7.a
3.8.3 M02	The CTS does not provide any requirements for DG lube oil, stored diesel fuel oil total particulate level or new diesel fuel oil properties. ITS LCO 3.8.3, in part, requires the stored diesel fuel oil and lube oil to be within limits for each required DG. The Applicability for these requirements is when the associated DG is required to be OPERABLE. ITS SR 3.8.3.2 requires verification that the lube oil inventory is ≥ 504 gallons for each DG. ITS SR 3.8.3.3 requires verification that new and stored fuel oil properties are tested and maintained within limits, as specified in the Diesel Fuel Oil Testing Program. This includes stored fuel oil total particulate level and new fuel oil properties. ITS 3.8.3 ACTION B provides an ACTION if the limit of ITS SR 3.8.3.2 is not met. ITS 3.8.3 ACTION C specifies the compensatory actions for one or more DGs with stored fuel oil total particulates not within limits. ITS 3.8.3 ACTION D specifies the compensatory actions for one or more DGs with new fuel oil properties not within limits. This changes the CTS by adding property limits for new and stored diesel fuel oil and a lube oil inventory limit, Surveillance Requirements to verify the limits are being maintained, and explicit ACTIONS for when the limits are not met.	LCO 3.8.3, including Applicability, 3.8.3 ACTIONS B, C, and D, SRs 3.8.3.2 and 3.8.3.3	None
3.8.3 M03	The CTS does not provide any specific testing requirements to check for or remove accumulated water from the fuel oil storage tanks. ITS SR 3.8.3.4 requires this verification every 92 days. This changes the CTS by requiring a new Surveillance Requirement to check for and remove accumulated water from the fuel oil storage tanks.	SR 3.8.3.4	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.4 M01	CTS 3.7.a requires the station batteries and chargers (specified in CTS 3.7.a.6) to be OPERABLE when the reactor is critical. In addition, CTS 3.7.b provides actions when the station batteries are inoperable during power operation or recovery from an inadvertent trip. If the inoperable battery is not restored within 24 hours as required by CTS 3.7.b.3, then CTS 3.7.b requires the unit to be in HOT STANDBY (ITS equivalent MODE 2) within 6 hours. Furthermore, for inoperabilities of the DC battery chargers or of batteries in both trains, since no actions are provided, CTS 3.0.c would also require a the unit to be subcritical within a total of 13 hours (1 hour to initiate action, 6 hours to be in HOT STANDBY (which allows the reactor to still be critical), and 6 hours to be in HOT SHUTDOWN (which requires the reactor to be subcritical)). ITS LCO 3.8.4 requires the Train A and Train B DC electrical power subsystems to be OPERABLE in MODES 1, 2, 3, and 4. When a unit shutdown is required due to an inoperability of the DC electrical power subsystem, ITS 3.8.4 ACTION C requires the unit to be in MODE 3 (CTS equivalent HOT SHUTDOWN) within 6 hours and in MODE 5 (CTS equivalent COLD SHUTDOWN) in 36 hours. This changes the CTS by requiring the batteries to be OPERABLE in MODE 3 and 4 and in MODE 2 when the reactor is not critical and provides commensurate ACTIONS to cover the new Applicability.	3.8.4 ACTION C	3.7.b, 3.0.c
3.8.4 M02	CTS 3.7.b.3 allows one battery to be inoperable for 24 hours. ITS 3.8.4 ACTION B requires the restoration of an inoperable battery within 2 hours. This changes the CTS by reducing the time the unit can operate with one battery inoperable.	3.8.4 ACTION B	3.7.b.3
3.8.4 M03	The CTS does not provide any specific testing requirements to verify battery terminal voltage. ITS SR 3.8.4.1 requires the verification that battery terminal voltage is greater than or equal to the minimum established float voltage every 7 days. ITS SR 3.8.4.2 requires verification, every 18 months, each required battery charger can supply ≥ 150 amps at greater than or equal to the minimum established float voltage for ≥ 8 hours or to verify each required battery charger can recharge the battery to the fully charged state within 24 hours while supplying the largest combined demands of the various continuous steady state loads, after a battery discharge to the bounding design basis discharge state. ITS SR 3.8.4.3 requires the verification that battery capacity is adequate to supply, and maintain in OPERABLE status, the required emergency loads for the design duty cycle when subjected to a battery	SR 3.8.4.1, SR 3.8.4.2, SR 3.8.4.3	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.4 M03 (continued)	service test every 18 months. ITS SR 3.8.4.3 includes an allowance (Note 1) to perform a modified performance discharge test (ITS SR 3.8.6.6) in lieu of the battery service test. In addition, Note 2 includes a restriction that the Surveillance shall not normally be performed in MODE 1, 2, 3, or 4, but allows credit to be taken for unplanned events that satisfy the SR. This changes the CTS by adding a new Surveillance Requirements for verifying the OPERABILITY of the batteries and the required battery chargers.	SR 3.8.4.1, SR 3.8.4.2, SR 3.8.4.3	None
3.8.4 M04	CTS 3.7.a.6 requires both station batteries and DC systems to be OPERABLE, "except during testing and Surveillance as described in TS 4.6.b." The tests and Surveillances in TS 4.6.b all affect the batteries. ITS 3.8.4 does not include this allowance - the DC electrical power system is required to be OPERABLE even when performing Surveillance Requirements, both for this Specification and for ITS 3.8.6, "Battery Parameters," on the batteries. This changes the CTS by requiring the DC batteries to be OPERABLE while performing Surveillance Requirements in MODES 1, 2, 3, and 4.	None	3.7.a.6
3.8.5 M01	The CTS does not have any requirements for the DC Sources in MODES 5 and 6 and during movement of irradiated fuel assemblies. ITS LCO 3.8.5 requires one DC electrical power subsystem to be OPERABLE. An appropriate ACTION and a Surveillance Requirement are also provided. This changes the CTS by incorporating the requirements of ITS 3.8.5.	LCO 3.8.5, including Applicability, 3.8.5 ACTION A, SR 3.8.5.1	None
3.8.6 M01	CTS 3.7.a requires the station batteries (specified in CTS 3.7.a.6), and hence, the battery parameters tested as specified in CTS 4.6.b, to be within limits when the reactor is critical. ITS LCO 3.8.6 requires the Train A and Train B battery parameters to be within limits "when associated DC electrical power subsystems are required to be OPERABLE." ITS 3.8.4 requires both Train A and Train B batteries to be OPERABLE in MODES 1, 2, 3, and 4 and ITS 3.8.5 requires one of the Train A or B battery to be OPERABLE in MODES 5 and 6 and during movement of irradiated fuel assemblies. This changes the CTS by requiring the batteries parameters to be within limits for both batteries in MODE 3 and 4 and in MODE 2 when the reactor is not critical and for one battery in MODES 5 and 6 and during movement of irradiated fuel assemblies.	LCO 3.8.6, including Applicability	3.7.a, 3.7.a.6

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.6 M02	CTS 4.6.b, which specifies the Surveillances for the batteries, does not provide any Surveillances on battery float current. ITS SR 3.8.6.1 requires verification every 7 days that each battery float current is ≤ 2 amps. However, as Noted, this requirement is not required to be met when battery terminal voltage is less than the limit of SR 3.8.4.1. This changes the CTS by adding an explicit Surveillance for battery float current.	SR 3.8.6.1	None
3.8.6 M03	CTS 4.6.b.1 requires each cell voltage and each pilot cell temperature to be measured. However, no voltage or temperature limit is provided in the CTS. CTS 4.6.b.2 requires the electrolyte level in each cell to be measured. However, no level limit is provided in the CTS. ITS SR 3.8.6.2 and SR 3.8.6.5 require verification that each pilot cell voltage and battery connected cell voltage, respectively, is ≥ 2.07 V. ITS SR 3.8.6.4 requires verification that each pilot cell temperature is greater than or equal to minimum established design limits. ITS SR 3.8.6.3 requires verification that each battery connected cell electrolyte level is greater than or equal to minimum established design limits. This changes the CTS by specifying an acceptance criteria for battery cell voltage, temperature, and electrolyte level limits.	SR 3.8.6.2, SR 3.8.6.3, SR 3.8.6.4, SR 3.8.6.5	4.6.b.1, 4.6.b.2
3.8.6 M04	CTS 4.6.b.2, in part, requires measurement of the electrolyte level of each battery cell every 92 days. ITS SR 3.8.6.3 requires verification that each battery connected cell electrolyte level is greater than or equal to the established limit every 31 days. This changes the CTS by increasing the Frequency of performance of the Surveillance from 92 days to 31 days.	SR 3.8.6.3	4.6.b.2
3.8.6 M05	CTS 4.6.b.4 requires the "load test" (i.e., a "performance discharge test" in the ITS) to be performed, but it does not provide an acceptance limit. ITS SR 3.8.6.6 requires the same test, but provides a capacity limit of ≥ 80% of the manufacturer's rating. This changes the CTS by specifying the battery capacity limit.	SR 3.8.6.6	4.6.b.4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.6 M06	CTS 4.6.b.4 requires the "load test" (i.e., a "performance discharge test" in the ITS) to be performed every 5 years. ITS SR 3.8.6.6 is performed every 60 months, every 12 months when the battery shows degradation or has reached 85% if the expected life with capacity < 100% of manufacturer's rating, and every 24 months when the battery has reached 85% of the expected life with capacity ≥ 100% of manufacturer's rating. This changes the CTS by adding accelerated Frequencies of 24 months if the battery has reached 85% of expected life, provided the battery capacity is ≥ 100% of the manufacturer's rating, and 12 months if the battery has reached 85% of expected life and the capacity is < 100% of manufacturer's rating.	SR 3.8.6.6	4.6.b.4
3.8.6 M07	CTS 4.6.b.4 requires performance of a "load test" (i.e., a "performance discharge test" in the ITS), but it does not provide any restrictions for when the test may be performed. In addition, CTS 3.7.a.6, which requires the batteries to be OPERABLE, states that they are not required when the tests and Surveillances of CTS 4.6.b are being performed. Thus, the CTS allows CTS 4.6.b.4 to be performed while critical. ITS SR 3.8.6.6 requires the same test, however a Note to SR3.8.6.6 specifies that this Surveillance shall not normally be performed in MODE 1, 2, 3, or 4. This changes the CTS by adding a specific restriction as to when the Surveillance can be performed.	SR 3.8.6.6 Note	4.6.b.4
3.8.7 M01	The CTS does not have any requirement for inverters to be OPERABLE in MODES 1, 2, 3, and 4. ITS 3.8.7 requires the Train A and Train B inverters to be OPERABLE in MODES 1, 2, 3, and 4. This changes the CTS by incorporating the requirements of ITS 3.8.7.	3.8.7	None
3.8.8 M01	The CTS does not have any requirement for inverters to be OPERABLE in MODES 5 and 6, and during movement of irradiated fuel assemblies. ITS 3.8.8 requires one inverter to be OPERABLE to support the 120 VAC instrument electrical distribution subsystem required by LCO 3.8.10, "Distribution Systems-Shutdown." This changes the CTS by incorporating the requirements of ITS 3.8.8.	3.8.8	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.9 M01	CTS 3.7.a requires the Train A and B AC and DC electrical power distribution subsystems (specified in CTS 3.7.a.3, 4, 5, and 6) to be OPERABLE when the reactor is critical. In addition, CTS 3.7.b provides actions when the Train A and B AC electrical power distribution subsystems are inoperable during power operation or recovery from an inadvertent trip. If the inoperable AC bus is not restored within 24 hours as required by CTS 3.7.b.6, then CTS 3.7.b requires the unit to be in HOT STANDBY (ITS equivalent MODE 2) within 6 hours. Furthermore, for inoperabilities of the DC buses or of AC buses in both trains, since no actions are provided, CTS 3.0.c would also require the unit to be subcritical within a total of 13 hours (1 hour to initiate action, 6 hours to be in HOT STANDBY (which allows the reactor to still be critical), and 6 hours to be in HOT SHUTDOWN (which requires the reactor to be subcritical)). ITS LCO 3.8.9 requires the Train A and B AC and DC electrical power distribution subsystems to be OPERABLE in MODES 1, 2, 3, and 4. When a unit shutdown is required due to inoperabilities of the AC or DC buses, ITS 3.8.9 ACTION D requires the unit to be in MODE 3 (CTS equivalent HOT SHUTDOWN) within 6 hours and in MODE 5 (CTS equivalent COLD SHUTDOWN) in 36 hours. This changes the CTS by requiring the Train A and B AC and DC electrical power distribution subsystems to be OPERABLE in MODES 3 and 4 and in MODE 2 when the reactor is not critical and provides commensurate ACTIONS to cover the new Applicability.	3.8.9 Applicability, 3.8.9 ACTION D	3.7.a, 3.7.b
3.8.9 M02	The CTS does not specify requirements for AC instrument electrical power distribution subsystems to be OPERABLE in MODES 1, 2, 3, and 4. ITS 3.8.9, in part, requires the Train A and Train B AC instrument bus electrical power distribution power subsystems to be OPERABLE in MODES 1, 2, 3, and 4. Appropriate ACTIONS (B and E, including an ACTIONS Note) and a Surveillance Requirement (SR 3.8.9.1) are also provided. This changes the CTS by incorporating these ITS 3.8.9 requirements.	LCO 3.8.9, including Applicability, 3.8.9 ACTIONS Note and ACTIONS B and E, SR 3.8.9.1	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.9 M03	CTS 3.7.b.6 requires inoperable AC buses to be restored to OPERABLE status within 24 hours provided the redundant bus and its loads remain OPERABLE. ITS 3.8.9 Required Action A.1 allows 8 hours to restore the Train A and Train B AC electrical power distribution subsystem(s) to OPERABLE status. In addition, a Note has been added (ITS 3.8.9, Note to ACTION A) that requires entry into applicable Conditions and Required Action of LCO 3.8.4, "DC Sources – Operating," for DC Sources made inoperable by inoperable power distribution subsystems. Furthermore, if redundant AC buses are inoperable, ITS 3.8.9 ACTION E will require entry into LCO 3.0.3, which will then require a unit shutdown, consistent with the current CTS 3.7.b.6 requirement. This changes the CTS by reducing the time the unit can operate with one or more AC buses inoperable and by requiring the compensatory actions for DC Sources to be taken immediately if a DC Source is made inoperable by inoperable AC power distribution subsystems.	3.8.9 Required Action A.1, including Note to ACTION A, 3.8.9 ACTION E	3.7.b.6
3.8.9 M04	CTS 3.7.a does not provide any specific testing requirements for the Train A and B AC and DC electrical power distribution subsystems. ITS SR 3.8.9.1, in part, requires verification of correct breaker alignments and voltage to required AC and DC electrical power distribution subsystems. This changes the CTS by requiring a new Surveillance Requirement for verifying the OPERABILITY of the required Train A and B AC and DC electrical power distribution subsystems.	SR 3.8.9.1	None
3.8.10 M01	The CTS does not have any specific Surveillance Requirements for the Distribution Systems when they are required to be OPERABLE to support equipment required to be OPERABLE in MODES 5 and 6 and during movement of irradiated fuel assemblies. ITS SR 3.8.10.1 requires verification of correct breaker alignment and voltage to the required AC, DC, and AC instrument bus electrical power distribution subsystems every 7 days. This changes the CTS by adding the explicit Surveillance for the portions of the electrical power distribution subsystems required to be OPERABLE in MODES 5 and 6 and during movement of irradiated fuel assemblies.	SR 3.8.10.1	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.1 M01	CTS 3.8.a.5 is applicable during REFUELING OPERATIONS. CTS 3.8.a.5 also states, in part, that a minimum boron concentration shall be maintained when there is fuel in the reactor and during reactor vessel head removal or while loading and unloading fuel from the reactor. ITS 3.9.1 is applicable at all times while in MODE 6. This changes the CTS by requiring the boron concentration be maintained at all times while in MODE 6 and not just during those refueling activities/conditions contained within the CTS.	3.9.1 Applicability	3.8.a.5
3.9.1 M02	CTS 3.8.a.5 states, in part, that a minimum boron concentration as specified in the COLR shall be maintained in the Reactor Coolant System. ITS LCO 3.9.1 states, in part, that the boron concentrations of the Reactor Coolant System (RCS), the fuel transfer canal, and the refueling cavity shall be maintained within the limit specified in the COLR. ITS 3.9.1 Applicability contains a NOTE that states the LCO is only applicable to the fuel transfer canal and the refueling cavity when connected to the RCS. This changes the CTS by including the boron concentration of the fuel transfer canal and the refueling cavity in the LCO and adds a NOTE to the Applicability stating that the LCO is only applicable to the fuel transfer canal and the refueling cavity when connected to the RCS.	LCO 3.9.1 and Applicability Note	3.8.a.5
3.9.1 M03	CTS 5.4.a.3 does not provide any ACTIONS to take when the spent fuel pool boron concentration is not within limit during REFUELING OPERATIONS. When the spent fuel pool boron concentration is not within limit, ITS 3.9.1 ACTION A requires the immediate suspension of positive reactivity additions and immediate action to restore the boron concentration to within limit. This changes the CTS by providing specific ACTIONS when the spent fuel pool boron concentration is not within limit during refueling operations (i.e., in MODE 6 when connected to the RCS).	3.9.1 ACTION A	None
3.9.2 M01	CTS 3.8.a is applicable during REFUELING OPERATIONS. CTS 3.8.a.3 also states, in part, that core subcritical neutron flux shall be monitored by two neutron monitors when core geometry is being changed. When core geometry is not being changed, only one is required. ITS 3.9.2 is applicable at all times while in MODE 6. This changes the CTS by requiring the core subcritical neutron flux to be monitored by two neutron monitors at all times while in MODE 6 and not just during those times when core geometry is being changed.	3.9.2 Applicability	3.8.a, 3.8.a.3

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.2 M02	When the required neutron monitors are not capable of continuously monitoring the core subcritical neutron flux during REFUELING OPERATIONS (which is defined as movement of reactor vessel internal components that could affect the reactivity of the core within the containment when the reactor head is unbolted or removed), CTS 3.8.b requires refueling of the reactor to cease. When one source range neutron flux monitor is inoperable, ITS 3.9.2 ACTION A requires an action similar to the first action of CTS 3.8.b, (Required Action A.1), but also includes an additional action to be taken. ITS 3.9.2 Required Action A.2 also requires immediate suspension of operations that would cause introduction of coolant into the RCS with a boron concentration less than required to meet the boron concentration of LCO 3.9.1. When both source range neutron flux monitors are inoperable, in addition to ITS 3.9.2 ACTION A, ITS 3.9.2 ACTION B requires immediately initiating action to restore one source range neutron flux monitor to OPERABLE status (Required Action B.1) and performing SR 3.9.1.1 once per 12 hours (Required Action B.2). When the audible count rate circuit is inoperable, ITS 3.9.2 ACTION C requires immediately initiating action to isolate unborated water sources (Required Action C.1). This changes the CTS by adding new Required Actions when the required nuclear instrumentation is inoperable.	3.9.2 ACTIONS A, B, and C	3.8.b
3.9.2 M03	CTS 3.8.a.3, in part, requires the core subcritical neutron flux to be monitored under certain conditions, but does not provide a Surveillance Requirement to periodically verify the calibration of the source range neutron flux monitors. ITS SR 3.9.2.2 requires a CHANNEL CALIBRATION of the Nuclear Instrumentation (source range neutron flux monitors) every 18 months. SR 3.9.2.2 also contains a NOTE excluding the neutron detectors from the CHANNEL CALIBRATION. This changes the CTS by adding a new Surveillance Requirement to periodically verify the calibration of the source range neutron flux monitors.	SR 3.9.2.2	3.8.a.3

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.3 M01	CTS 3.1.a.1.A, which (in MODE 6) requires a residual heat removal (RHR) pump to be in operation, is applicable in MODE 6 only when a reduction is made in the boron concentration of the reactor coolant. ITS 3.9.3, in part, requires an RHR loop to be in operation and is applicable at all times when in MODE 6 with the water level ≥ 23 ft above the top of the reactor vessel flange, except as allowed in the LCO Note. The Note allows the required RHR pump to be removed from operation for ≤ 1 hour per 8 hour period, provided no operations are permitted that would cause introduction of coolant into the RCS with boron concentration less than required to meet the SDM of LCO 3.9.1. This changes the CTS by specifying that the LCO requirement for an RHR pump to be in operation is applicable in MODE 6 with the water level ≥ 23 ft above the top of the reactor vessel flange at all times except for the condition specified in the ITS 3.9.3 LCO Note.	LCO 3.9.3, including Note	3.1.a.1.A
3.9.3 M02	When the required RHR train is inoperable, CTS 3.1.a.2.B.2 requires immediate action to be taken to restore the train to OPERABLE status. In addition, CTS 3.8.a.4 requires one RHR pump to be OPERABLE during REFUELING OPERATIONS (which is defined as movement of reactor vessel internal components that could affect the reactivity of the core within the containment when the reactor head is unbolted or removed). If this requirement is not met, CTS 3.8.b requires refueling of the reactor to cease, initiation of action to restore the RHR pump to OPERABLE status, and no operations be performed that could increase the reactivity of the core. Under similar conditions, ITS 3.9.3 ACTION A requires an action similar to CTS 3.1.a.2.B.2 and the second action of CTS 3.8.b, (Required Action A.3) and an action similar to the first action of CTS 3.8.b (Required Action A.2), but also includes additional actions to be taken. ITS 3.9.3 ACTION A also requires immediate suspension of operations that would cause introduction of coolant into the RCS with a boron concentration less than required to meet the boron concentration of LCO 3.9.1 (Required Action A.1), closing the equipment hatch and securing it with four bolts in 4 hours (Required Action A.4), closing one door in each air lock in 4 hours (Required Action A.5), and a verification that 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 and OPERABLE Containment Purge and Vent Isolation System in 4 hours (Required Action A.6). This changes the CTS by adding new Required Actions when the required RHR loop is inoperable.	3.9.3 ACTION A	3.1.a.2.B.2, 3.8.a.4, 3.8.b

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.3 M03	CTS 3.1.a.1.A does not contain any ACTIONS to take should there be less than the required number of RHR pumps in operation. As a result, CTS 3.0.c would normally be entered. However, LCO 3.0.c states that it is not applicable in COLD SHUTDOWN or REFUELING. Since the RHR pump only has to be in operation when a reduction in boron concentration is being made, and for this Specification, the unit is already in MODE 6, the CTS does not provide any compensatory measures. Therefore, 10 CFR 50.36 (c)(2)(i) would apply, which states to shutdown the unit. However, no times are provided to complete the shutdown and no further actions (i.e., suspend boron concentration reductions) are required. Note that while no ACTIONS are required, KPS in all likelihood would suspend dilution if this occurred. ITS 3.9.3 ACTION A specifies the Required Actions for a required RHR loop not in operation, and requires immediate suspension of operations that would cause introduction of coolant into the RCS with a boron concentration less than required to meet the boron concentration of LCO 3.9.1 (Required Action A.1), immediate suspension of loading irradiated fuel assemblies into the core (Required Action A.2), immediate initiation of action to restore one RHR loop to operation (Required Action A.3), closing the equipment hatch and securing it with four bolts in 4 hours (Required Action A.4), closing one door in each air lock in 4 hours (Required Action A.5), and a verification that 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 an OPERABLE Containment Purge and Vent Isolation System in 4 hours (Required Action A.6). This changes the CTS by adding a new ACTION.	3.9.3 ACTION A	None
3.9.3 M04	CTS 3.1.a.1.A requires one RHR pump to be in operation under certain conditions, but does not provide a Surveillance Requirement to periodically verify the required pump is in operation. ITS SR 3.9.3.1 requires verification that each required RHR loop is in operation and circulating reactor coolant every 12 hours. This changes the CTS by adding a new Surveillance Requirement to periodically verify the required pump is in operation.	SR 3.9.3.1	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.4 M01	CTS 3.1.a.1.A, which (in MODE 6) requires a residual heat removal (RHR) pump to be in operation, is applicable in MODE 6 only when a reduction is made in the boron concentration of the reactor coolant. ITS 3.9.4, in part, requires an RHR loop to be in operation and is applicable at all times when in MODE 6 with the water level < 23 ft above the top of the reactor vessel flange, except as allowed in ITS 3.9.4 LCO Note 1. Note 1 allows all RHR pumps to not be in operation for ≤ 15 minutes when switching from one loop to the other provided a) core outlet temperature is maintained > 10ºF below saturation temperature; b) no operations are permitted that would cause introduction of coolant into the RCS with boron concentration less than required to meet the SDM of LCO 3.9.1; and c) no draining operations to further reduce the RCS water volume are permitted. This changes the CTS by specifying that the LCO requirement for an RHR pump to be in operation is applicable in MODE 6 with the water level < 23 ft above the top of the reactor vessel flange at all times except for the conditions specified in the ITS 3.9.4 LCO Note 1.	LCO 3.9.4, including Note 1	3.1.a.1.A
3.9.4 M02	CTS 3.1.a.2.B does not contain any ACTIONS to take if both required RHR loops are inoperable in MODE 6. As a result, CTS 3.0.c would be entered, which requires action to be initiated within 1 hour, to be in HOT STANDBY (equivalent to ITS MODE 2) within the next 6 hours, to be in HOT SHUTDOWN (equivalent to ITS MODE 3) within the following 6 hours, and to be in COLD SHUTDOWN (equivalent to ITS MODE 5) within the subsequent 36 hours. However, since the unit is already in MODE 6, the CTS 3.0.c requirement does not really provide any relevant compensatory measures. ITS 3.9.4 ACTION A provides the Required Actions when one or both required RHR loops are inoperable. The Required Actions are to immediately initiate action to restore the required RHR loops to OPERABLE status or to immediately initiate action to establish ≥ 23 ft of water above the top of the reactor vessel flange. This changes the CTS by adding a new ACTION when both required RHR loops are inoperable.	3.9.4 ACTION A	None
3.9.4 M03	CTS 3.1.a.1.A does not contain any ACTIONS to take should there be less than the required number of RHR pumps in operation. As a result, CTS 3.0.c would normally be entered. However, LCO 3.0.c states that it is not applicable in COLD SHUTDOWN or REFUELING. Since the RHR pump only has to be in operation	3.9.4 ACTION B	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.4 M03 (continued)	when a reduction in boron concentration is being made, and for this specification, the unit is already in MODE 6, the CTS does not provide any compensatory measures. Therefore, 10 CFR 50.36(c)(2)(i) would apply, which states to shut down the unit. However, no times are provided to complete the shutdown and no further actions (i.e., suspend boron concentration reductions) are required. Note that while no ACTIONS are required, KPS in all likelihood would suspend dilution if this occurred. ITS 3.9.4 ACTION B specifies the Required Actions for a required RHR loop not in operation, and requires immediate suspension of operations that would cause introduction of coolant into the RCS with a boron concentration less than required to meet the boron concentration of LCO 3.9.1 (Required Action B.1), immediate initiation of action to restore one RHR loop to operation (Required Action B.2), closing the equipment hatch and securing it with four bolts in 4 hours (Required Action B.3), closing one door in each air lock in 4 hours (Required Action B.4), and a verification that 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 an OPERABLE Containment Purge and Vent Isolation System in 4 hours (Required Action B.5). This changes the CTS by adding a new ACTION.	3.9.4 ACTION B	None
3.9.4 M04	CTS 3.1.a.1.A requires one RHR pump to be in operation under certain conditions, but does not provide a Surveillance Requirement to periodically verify the required pump is in operation. ITS SR 3.9.4.1 requires verification that each required RHR loop is in operation and circulating reactor coolant every 12 hours. CTS 3.1.a.2.B requires two RHR trains to be OPERABLE, but does not provide a Surveillance Requirement to periodically verify the required loops are OPERABLE. ITS SR 3.9.4.2 requires verification that each required RHR pump is OPERABLE every 7 days by verifying correct breaker alignment and indicated power are available to each required pump. A Note further explains that the Surveillance is not required to be performed until 24 hours after a required pump is not in operation. This changes the CTS by adding new Surveillance Requirements to periodically verify the required pump is in operation and the required pumps are OPERABLE.	SR 3.9.4.1, SR 3.9.4.2	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.5 M01	CTS 3.8.A.10 requires the minimum water level above the vessel flange to be maintained at 23 feet during REFUELING OPERATIONS, but does not provide a Surveillance Requirement to periodically verify this requirement is met. ITS SR 3.9.5.1 requires verification that the refueling water cavity level is ≥ 23 feet above the top of the reactor vessel flange once every 24 hours. This changes the CTS by adding a specific Surveillance to periodically verify this requirement.	SR 3.9.5.1	None
3.9.6 M01	CTS 3.8.a does not provide a Surveillance Requirement to verify each required containment penetration is in the required status. The ITS adds a Surveillance Requirement (SR 3.9.6.1) to verify each required containment penetration is in the required status once every 7 days. This changes the CTS by adding a new Surveillance Requirement for the containment penetrations.	SR 3.9.6.1	None
4.0 M01	ITS 4.3.1.1.c requires that spent fuel storage racks in the Fuel Transfer Canal Pool are designed and maintained to have a nominal 8.3 inch rack cell lattice spacing between fuel assemblies in order to prevent criticality of the spent fuel assemblies. ITS 4.3.1.1.d requires that spent fuel storage racks in the North and South Pools Combined are designed and maintained to have a minimum 10 inch center to center distance between fuel assemblies in order to prevent criticality of the spent fuel assemblies. ITS 4.3.1.1.e provides the requirements for loading new and spent fuel assemblies in accordance with ITS LCO 3.7.15. The CTS does not contain this information. This changes the CTS by adding specific requirements for the design and maintenance of the spent fuel storage racks.	4.3.1.1.c, 4.3.1.1.d, 4.3.1.1.e	None
4.0 M02	ITS 4.3.1.2.d requires that new fuel storage racks are designed and maintained to have a nominal 21 inch center to center distance between fuel assemblies in order to prevent criticality of the new fuel assemblies. The CTS does not contain this information. This changes the CTS by adding specific requirements for the design and maintenance of the new fuel storage racks.	4.3.1.2.d	None
4.0 M03	ITS 4.3.2 requires that spent fuel storage pool is designed and shall be maintained to prevent inadvertent draining of the pool below elevation 645 ft 2 inches (mean sea level). The CTS does not contain this information. This changes the CTS by adding a new requirement for the design and maintenance of the spent fuel storage pool.	4.3.2	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.1 M01	ITS 5.1.2 requires that the shift manager shall be responsible for the control room command function. During any absence of the shift manager from the control room while the unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Operator license shall be designated to assume the control room command function. During any absence of the shift manager from the control room while the unit is in MODE 5 or 6, an individual with an active Senior Operator license or Operator license shall be designated to assume the control room command function. The CTS does not include this requirement. This changes the CTS by adding an approved requirement for control room command.	5.1.2	None
5.2 M01	CTS 6.1.a describes that the plant manager is responsible for overall plant operation. CTS 6.2.a states that the off-site organization for plant management and technical support shall be as described in the quality assurance manual. CTS 6.2.b states that the plant organization shall be as described in the quality assurance program. ITS 5.2.1 states: "Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting safety of the nuclear power plant. a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications shall be documented in the quality assurance program; b. The plant manager shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant;	5.2.1	6.1.a, 6.2.a, 6.2.b

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.2 M01 (continued)	c. A specified corporate officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety; and d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures. This changes the CTS by providing more details concerning the onsite and offsite organizations in the Technical Specification.	5.2.1	6.1.a, 6.2.a, 6.2.b
5.2 M02	ITS 5.2.2.d states that "The operations manager or assistant operations manager shall hold an SRO license." CTS 6.2 does not include these requirements. This changes the CTS by adding new requirements concerning unit staff qualification to the CTS.	5.2.2.d	NA
5.4 M01	CTS 6.8.a requires that written procedures and administrative policies shall be implemented and maintained that meet the requirements and recommendation of the quality assurance program. ITS 5.4.1.a requires that procedures be established, implemented, and maintained for the applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978. ITS 5.4.1.b requires that procedures be established, implemented, and maintained for the emergency operating procedures required to implement the requirements of NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33. ITS 5.4.1.d requires that procedures be established, implemented, and maintained for Fire Protection Program implementation. This changes the CTS by specifying new requirements for procedures in the CTS.	5.4.1.a, 5.4.1.b	6.8.a
5.4 M02	ITS 5.4.1.e requires that written procedures shall be established, implemented, and maintained for all programs specified in Specification 5.5. The CTS does not include this requirement for any programs, other than the ODCM as specified in CTS 6.16.a.2. This changes the CTS by adopting a new requirement for procedures to address all programs described in ITS 5.5.	5.4.1.e	6.16.a.2

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.5 M01	CTS 6.18.b.2 states, in part, that the ODCM becomes effective after review and acceptance by the PORC. ITS 5.5.1.c.2 states, in part, that the ODCM becomes effective after review and acceptance by the plant manager. This changes the CTS by requiring the plant manager approval for the ODCM.	5.5.1.c.2	6.18.b.2
5.5 M02	CTS 6.12 specifies the requirements for System Integrity, however it does not list the systems that must be monitored. ITS 5.5.2 specifically lists the systems that must be monitored by the Primary Coolant Sources Outside Containment Program. This changes the CTS by adding the specific systems that are affected by the Primary Coolant Sources Outside Containment Program.	5.5.2	6.12
5.5 M03	The CTS does not include program requirements for a Component Cyclic or Transient Limit Program. The ITS includes a program for this activity. This changes the CTS by adding the Component Cyclic or Transient Limit Program.	5.5.4	None
5.5 M04	The CTS does not include program requirements for the Reactor Coolant Pump Flywheel Inspection Program. The ITS includes a program for this activity. This changes the CTS by adding the Reactor Coolant Pump Flywheel Inspection Program.	5.5.5	None
5.5 M05	CTS 6.15, Secondary Water Chemistry Program, does not include the low pressure turbine disc stress corrosion cracking as part of the scope of the program. ITS 5.5.8 includes the low pressure turbine disc stress corrosion cracking as part of the monitoring program. This changes the CTS by adding the low pressure turbine disc stress corrosion cracking to the scope of the Secondary Water Chemistry Program.	5.5.8	6.15
5.5 M06	CTS 6.15, Secondary Water Chemistry Program, does not contain specific control mechanisms for monitoring the secondary water chemistry. It only provides a general description that secondary water chemistry program shall act as a guide for the chemistry group in their routine as well as non-routine activities. ITS 5.5.8 includes specific control mechanisms that shall be included in the program. This changes the CTS by adding additional details regarding what is to be included in the Secondary Water Chemistry Program.	5.5.8	6.15

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.5 M07	The CTS does not have a program for Explosive Gas and Storage Tank Radioactivity Monitoring. ITS 5.5.10 requires a program to provide controls for potentially explosive gas mixtures contained in the Gaseous Radioactive Waste Disposal System, the quantity of radioactivity contained in gas storage tanks or fed into the offgas treatment system, and the quantity of radioactivity contained in unprotected outdoor liquid storage tanks. This changes the CTS by incorporating the requirements of ITS 5.5.10.	5.5.10	None
5.5 M08	The CTS does not have a program for Diesel Fuel Oil Testing. ITS 5.5.11 requires a program to implement testing of both new fuel oil and stored fuel oil. This changes the CTS by incorporating the requirements of ITS 5.5.11.	5.5.11	None
5.5 M09	The CTS does not include program requirements for the Safety Function Determination Program. The ITS includes a program for the Safety Function Determination Program. This change the CTS by adding the Safety Function Determination Program (SFDP).	5.5.13	None
5.5 M10	The CTS does not include a requirement for Battery Monitoring and Maintenance Program. The ITS includes a requirement for this program. This changes the CTS by adding the ITS 5.5.15, "Battery Monitoring and Maintenance Program."	5.5.15	None
5.5 M11	The CTS does not have a program for Setpoint Control. ISTS 5.5.18 (ITS 5.5.16) requires a program to satisfy the regulatory requirement of 10 CFR 50.36(c)(1)(ii)(A) that Technical Specifications will include items in the category of limiting safety system settings (LSSS), which are settings for automatic protective devices related to those variables having significant safety functions. This changes the CTS by incorporating the requirements of ISTS 5.5.18 (ITS 5.5.16).	5.5.16	None
5.5 M12	CTS 6.20 states that the peak calculated containment internal pressure for the design basis loss of coolant accident is less than the containment internal test pressure. The containment internal test pressure is defined as P_a in the CTS. ITS 5.5.14.b contains a specific value for the calculated peak containment internal pressure for the design basis loss of coolant accident and the containment design pressure. The calculated peak containment internal pressure for the design basis loss of coolant accident is defined as P_a in the ITS. This changes the CTS by adding a specific value for the calculated peak containment internal pressure for the design basis loss of coolant accident and a value for the containment design pressure.	5.5.14.b	6.20

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.5 M13	CTS 3.6.c.3.A, 3.6.c.3.C, 3.8.a.9.b.1, 3.8.a.9.b.3, 3.12.c.1, 3.12.c.3, 4.4.c.1.a, 4.4.c.3, 4.4.d.1, 4.12.a.1, and 4.17.a.1 require certain Ventilation System filter tests to be performed at the system design flow rate. However, no specific value of the various Ventilation System design flow rates is provided. ITS 5.5.9.a, b, d, and e require performance of similar Ventilation System filter tests, and include the specific value of the design flow rate for each required Ventilation System. This changes the CTS by adding the specific design flow rate values into the filter test requirements of the ITS.	5.5.9.a, b, d, and e	3.6.c.3.A, 3.6.c.3.C, 3.8.a.9.b.1, 3.8.a.9.b.3, 3.12.c.1, 3.12.c.3, 4.4.c.1.a, 4.4.c.3, 4.4.d.1, 4.12.a.1, 4.17.a.1
5.6 M01	The second paragraph of ITS 5.6.1 includes details required to be included in the Annual Radiological Environmental Operating Report. CTS 6.9.b.1.A does not contain this level of detail. This changes the CTS by requiring additional detail to be included in the Annual Radiological Environmental Operating Report.	5.6.1	6.9.b.1.A
5.6 M02	The CTS does not include program requirements for the Post Accident Monitoring Report. The ITS includes a requirement for this report. This changes the CTS by adding the Post Accident Monitoring Report requirement.	5.6.4	None
5.7 M01	CTS 6.13.a, in reference to entrance into a high radiation area states "…entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP)." CTS 6.13.b states, in part, "…access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work area and the maximum allowable stay time for individuals in that area." ITS 5.7.1.b and 5.7.2.b state, "Access to, and activities in, each such area shall be controlled by means of Radiation Work Permit (RWP) or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures." This changes the CTS by specifying certain information is required to be in the RWP or equivalent.	5.7.1.b, 5.7.2.b	6.13.a, 6.13.b

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.7 M02	CTS 6.13.a.2 states that one of the optional criteria that allows entry into a high radiation area is a radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. It further states that entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them. ITS 5.7.1.e and ITS 5.7.2.e include a similar requirement, but also require that the continuously escorted personnel will receive a pre-job briefing prior to entry into such areas, and that the dose rate determination, knowledge, and pre-job briefing do not require documentation prior to initial entry. This changes the CTS by expanding the requirement to apply to all the options for conditions allowing entry into a high radiation area, and adding the criteria that the continuously escorted personnel will receive a pre-job briefing prior to entry into such areas and that the dose rate determination, knowledge, and pre-job briefing do not require documentation prior to initial entry.	5.7.1.e, 5.7.2.e	6.13.a.2

Table R – Relocated Specifications

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.1 R01	CTS 3.2.a	CTS 3.2.a provides requirements on boric acid flow paths to the reactor core although the specification is labeled "Chemical and Volume Control System." The purpose for a boric acid flow path is for control of the chemical neutron absorber (boron) concentration in the Reactor Coolant System (RCS) and to help maintain the SHUTDOWN MARGIN. To accomplish this, the CTS requires at least one flow path to the core for boric acid injection. The Chemical and Volume Control System is not assumed to be OPERABLE to mitigate the consequences of a design basis accident (DBA) or transient. In the case of a malfunction of the CVCS, which causes a boron dilution event, the automatic response, or that required by the operator, is to close the appropriate valves in the reactor makeup system. This action is required before the shutdown margin is lost. Operation of the boration subsystem is not assumed to mitigate this event (KPS USAR Section 14.1.4). The ITS does not include this Specification. This changes the CTS by relocating this Specification to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	NA

Table R – Relocated Specifications

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.3 R01	Table TS 3.5-6 Functional Unit 1, Functional Unit 3, Functional Unit 4, Functional Unit 5, Table TS 4.1-1 Channel Description 31, Channel Description 32, Channel Description 32.a, Channel Description 33, Channel Description 34, Channel Description 34.a	CTS Tables TS 3.5-6 and TS 4.1-1 provide requirements for Post-Accident Monitoring Instrumentation channels. Each individual post accident monitoring parameter has a specific purpose; however, the general purpose for all accident monitoring instrumentation is to ensure sufficient information is available following an accident to allow an operator to verify the response of automatic safety systems, and to take preplanned manual actions to accomplish a safe shutdown of the plant. The NRC position on application of the screening criteria to post-accident monitoring instrumentation is documented in a letter dated May 9, 1988 from T.E. Murley (NRC) to W.S. Wilgus (B&W Owners Group). The screening criteria are now incorporated into 10 CFR 50.36(c)(2)(ii). The NRC position taken was that the post-accident monitoring instrumentation table list should contain, on a plant specific basis, all Regulatory Guide 1.97 Type A plant instruments specified in the plant's Safety Evaluation Report (SER) on Regulatory Guide 1.97, and all Regulatory Guide 1.97 Category 1 plant instruments. Accordingly, this position has been applied to KPS Regulatory Guide 1.97 plant instruments. Those plant instruments meeting these criteria have been retained in the ITS. The instruments not meeting these criteria will be relocated from the Technical Specifications to the Technical Requirements Manual (TRM). A review of the KPS USAR and the NRC Regulatory Guide 1.97 Safety Evaluation for KPS shows that the following CTS Table TS 3.5-6 and TS 4.1-1 Instruments do not meet Category 1 or Type A requirements.	TRM	10 CFR 50.59	NA

Table R – Relocated Specifications

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.3 R01 (Continued)	Table TS 3.5-6 Functional Unit 1, Functional Unit 3, Functional Unit 4, Functional Unit 5, Table TS 4.1-1 Channel Description 31, Channel Description 32, Channel Description 32.a, Channel Description 33, Channel Description 34, Channel Description 34.a	Functional Unit 1/Channel Description 31 AFW Flow Rate, Functional Unit 3/Channel Descriptions 32 and 32.a PORV Position, Functional Unit 4/Channel Description 33 PORV Block Valve Position, Functional Unit 5/Channel Descriptions 34 and 34.a Pressurizer Safety Valve Position	TRM	10 CFR 50.59	NA
3.3.3 R02	Table TS 4.1-1 Channel Description 29	CTS Table TS 4.1-1 Channel Description 29 provides requirements for seismic instrumentation. In the event of an earthquake, seismic instrumentation is required to permit comparison of the measured response to that used in the design basis of the facility to determine if plant shutdown is required pursuant to Appendix A of 10 CFR 100. Since this is determined after the event has occurred, it has no bearing on the mitigation of any design basis accident (DBA). The ITS does not include this Specification. This changes the CTS by relocating this Specification to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	NA

Table R – Relocated Specifications

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
CTS 3.11 R01	3.11, 3.11.a, 3.11.b, 3.11.d	CTS 3.11, 3.11.a, 3.11.b, and 3.11.d ensure the OPERABILITY of movable incore detector instrumentation when required to monitor the flux distribution within the core. The instrumentation is used for periodic Surveillance of the reactor core power distribution, and calibration of the excore neutron flux detectors, but is not assumed in any design basis accident (DBA) analysis and does not mitigate an accident. This Specification does not meet the criteria for retention in the Improved Technical Specifications (ITS); therefore, it will be retained in the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	NA
3.4 R01	CTS 3.1.a.7	CTS 3.1.a.7 provides requirements for the reactor coolant vent system. CTS 4.16 provides the testing requirements for the reactor coolant vent system. The reactor coolant vent system is provided to exhaust noncondensible gases and/or steam from the RCS which could inhibit natural circulation core cooling following any event involving a loss of offsite power and requiring long term cooling, such as a loss-of-coolant accident (LOCA). Their function, capabilities, and test requirements are consistent with the requirements of Item II.B.1 of NUREG-0737, "Clarification of TMI Action Plan Requirements," however; the operation of reactor vessel head vents is not part of the primary success path. The operation of these vents is an operator action after the event has occurred, and is only required when there is indication that natural circulation is not occurring. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	NA

Table R – Relocated Specifications

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.4 R01	CTS 3.1.b.2	CTS 3.1.b.2 states that the secondary side of the steam generator must not be pressurized > 200 psig if the temperature of the steam generator is < 70ºF. The limits meet the requirements given in the ASME Boiler and Pressure Vessel Code, Section III, Appendix G. These limitations are consistent with structural analysis results. However, these limits are not initial condition assumptions of a DBA or transient. These limits represent operating restrictions and Criterion 2 includes operating restrictions. However, it should be noted that in the Final Policy Station the Criterion 2 discussion specified only those operating restrictions required to preclude unanalyzed accidents and transients be included in Technical Specifications. This Specification does not meet the criteria for retention in the ITS, therefore, it will be retained in the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	NA
3.4 R01	CTS 3.1.b.3	CTS 3.1.b.3 states that the pressurizer cooldown and heatup rates shall not exceed 200ºF/hr and 100ºF/hr, respectively. It also states that the spray shall not be used if the temperature difference between the pressurizer and the spray fluid is > 320ºF. The limits meet the requirements given in the ASME Boiler and Pressure Vessel Code, Section III, Appendix G. These limitations are consistent with structural analysis results. However, these limits are not initial condition assumptions of a DBA or transient. These limits represent operating restrictions and Criterion 2 includes operating restrictions. However, it should be noted that in the Final Policy Station the Criterion 2 discussion specified only those operating restrictions required to preclude unanalyzed accidents and transients be included in Technical Specifications. This Specification	TRM	10 CFR 50.59	NA

Table R – Relocated Specifications

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.4 R01	CTS 3.1.b.3	does not meet the criteria for retention in the ITS,therefore, it will be retained in the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	NA
3.4 R01	CTS 3.1.e	CTS 3.1.e provides limits on the oxygen, chloride and fluoride content in the RCS. CTS Table 4.1-2 Sampling Test 1.d provides the testing requirements for the oxygen, chloride and fluoride content in the RCS. Poor coolant chemistry contributes to the long term degradation of system materials of construction, and thus is not of immediate importance to the plant operator. One reason is to reduce the possibility of failures in the Reactor Coolant System pressure boundary caused by corrosion. However, the chemistry monitoring activity is of a long term preventative purpose rather than of a mitigative purpose. This Specification does not meet the criteria for retention in the ITS; it will be retained in the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	NA
3.7 CTS 3.8.a.9 R01	3.8.a.9, 4.12	CTS 3.8.a.9 and 4.12 provide requirements on the Spent Fuel Pool Sweep System. CTS Table TS 4.1-1 Channel Description 19 (Radiation Monitors R13 and R14 only) provides the testing requirements for the Auxiliary Building Vent Monitors used to initiate closure of the ventilation dampers for the Spent Fuel Pool Sweep System. The purpose of the Spent Fuel Pool Sweep System is to filter radioactive particulates from the area of the fuel pool. The purpose of the Auxiliary Building vent monitors is to monitor the Auxiliary Building vent flowpath on a continuous basis. The Spent Fuel Pool Sweep System and the Auxiliary Building Vent Monitors are not taken credit for in any accident analyses in the USAR. This is also documented in the NRC Safety Evaluation for License Amendment 190, dated March 8, 2007 (ADAMS	TRM	10 CFR 50.59	NA

Table R – Relocated Specifications

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.7 CTS 3.8.a.9 R01 (continued)	3.8.a.9, 4.12	Accession No. ML 070430020). Therefore, the ITS does not include this Specification. This changes the CTS by relocating the Spent Fuel Pool Sweep System and the Auxiliary Building Vent Monitors to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	NA
3.7 CTS 4.13 R01	4.13	CTS 4.13 provides the testing requirements for possession, leak test, and record requirements for radioactive material sources required for operation of the facility. The limitations of sealed source contamination are intended to ensure that the radioactive material sources are available to the facility and are free from leakage. These Surveillance Requirements bear no relation to the conditions or limitations that are necessary to ensure safe reactor operation. This Specification does not meet the criteria for retention into the ITS; therefore, it will be retained in the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	NA
3.9 CTS 3.8.a.2 R01	3.8.a.2	CTS 3.8.a.2 provides the requirements for continuously monitoring radiation levels in the fuel handling area, the containment, and the spent fuel pool storage pool. Since these radiation monitors do not initiate any automatic mitigation systems, they are not of prime importance in limiting the likelihood or severity of accident sequences that are commonly found to dominate risk. These monitors only provide indication of the area radiation. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	NA

Table R – Relocated Specifications

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.9 CTS 3.8.a.6 R01	3.8.a.6	CTS 3.8.a.6 states that direct communication between the control room and the operating floor of the containment shall be available whenever changes in core geometry are taking place. This ensures that refueling station personnel can be promptly informed of significant changes in the facility status or core reactivity conditions during changes in core geometry. The prompt notification of the control room of a fuel handling accident is not an assumption in the fuel handling accident analysis. While notification is necessary to ensure that the control room is isolated to meet the control room operator dose limits in 10 CFR 50.67, the fuel handling analysis does not take credit for direct communications between the refueling station and the control room. The ITS does not include this Specification. This changes the CTS by relocating this Specification to the Updated Safety Analysis Report (USAR).	USAR	10 CFR 50.59	NA

Table R – Relocated Specifications

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
CTS 3.8.a.11 R01	3.8.a.11, Table TS 4.1-3 Equipment Test 5, including footnote (1)	CTS 3.8.a.11 states that a dead-load test shall be successfully performed on both the fuel handling and manipulator cranes before fuel movement begins. The load assumed by the cranes for the test must be equal to or greater than the maximum load to be assumed by the cranes during the REFUELING OPERATIONS. CTS 3.8.a.11 also requires a thorough visual inspection of the cranes shall be made after the dead-load test and prior to fuel handling. This Specification ensures the lifting device on the Manipulator Crane has adequate capacity to lift the weight of a fuel assembly and a Rod Control Cluster Assembly, and that an automatic load limiting device is available to prevent damage to the fuel assembly during fuel movement. This Specification also ensures the auxiliary hoist on the Manipulator Crane has adequate capacity for latching and unlatching control rod drive shafts. CTS Table TS 4.1-3, Equipment Test 5 requires the Refueling System Interlocks to be tested each Refueling Outage. This test ensures the other manipulator crane interlocks (e.g., ensuring only one component can be moved at one time) are OPERABLE. In addition, the testing is modified by Table TS 4.1-3 Note 1, which also requires the test to be performed following maintenance that could affect the operation of the refueling interlocks. The ITS does not include these requirements. This changes the CTS by relocating these requirements to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	NA