

Table M
More Restrictive Changes

DOC No.	TS Section 1.0 - Use and Application Description of Change (change numbers added for reference)	Change Type	Affected TS Section and Requirements
M01	<p>1. The current TS (CTS) 1.1 definition of REACTOR TRIP CHANNEL OPERATIONAL TEST (RTCOT) is deleted. The current SRs for the RTCOT are changed to require either a COT or an ACTUATION LOGIC TEST (ALT). The current SRs for the RTCOT, that are changed to require a COT are the following:</p> <ul style="list-style-type: none"> • Once prior to initiation of PHYSICS TESTS, current SR 3.1.8.1 requires an RTCOT per current SR 3.3.1.8 for the following reactor trip system (RTS) Functions (Fns) specified by CTS Table 3.3.1-1: <ul style="list-style-type: none"> 2.a Power Range Neutron Flux - High Setpoint (ITS 3.3.1 Fn 1.a) 3. Power Range Neutron Flux High Positive Rate (ITS 3.3.1 Fn 2) • Once prior to initiation of PHYSICS TESTS, current SR 3.1.8.1 also requires an RTCOT per current SR 3.3.1.9 for the following RTS Functions specified by CTS Table 3.3.1-1: <ul style="list-style-type: none"> 2.b Power Range Neutron Flux - Low Setpoint (ITS 3.3.1 Fn 1.b) 4. Intermediate Range Neutron Flux (ITS LCO 3.3.3) • Once per 92 days, current SR 3.3.1.8 requires performing an RTCOT in accordance with the Setpoint Program on each of the following reactor trip system (RTS) automatic-protection-instrumentation Functions specified by CTS Table 3.3.1-1: <ul style="list-style-type: none"> 2.a Power Range Neutron Flux - High Setpoint.....(ITS 3.3.1 Function 1.a) 3. Power Range Neutron Flux High Positive Rate(ITS 3.3.1 Function 2) 5. Source Range Neutron Flux High Setpoint - in MODES 3, 4, and 5 with Reactor Trip Breakers (RTBs) closed and Plant Control System capable of rod withdrawal..... 6. Overtemperature ΔT.....(ITS LCO 3.3.2) 7. Overpower ΔT.....(ITS 3.3.1 Fn 3) 8.a Pressurizer Pressure - Low Setpoint.....(ITS 3.3.1 Fn 4) 8.b Pressurizer Pressure - High Setpoint.....(ITS 3.3.1 Fn 5.a) 9. Pressurizer Water Level - High 3.....(ITS 3.3.1 Fn 5.b) 10. Reactor Coolant Flow - Low.....(ITS 3.3.1 Fn 6) 11. Reactor Coolant Pump (RCP) Bearing Water Temperature - High.....(ITS 3.3.1 Fn 7) 12. RCP Speed - Low.....(ITS 3.3.1 Fn 8) 13. Steam Generator (SG) Narrow Range Water Level - Low.....(ITS 3.3.1 Fn 9) 14. Steam Generator (SG) Narrow Range Water Level - High 2.....(ITS 3.3.1 Fn 10) 16. Reactor Trip System Interlocks (See DOC L10.) <ul style="list-style-type: none"> a. Intermediate Range Neutron Flux, P-6.....(ITS LCO 3.3.3) b. Power Range Neutron Flux, P-10.(ITS 3.3.1 Fns 1.b, 5.a, 6, 7, 9; LCO 3.3.2, 3.3.3) c. Pressurizer Pressure, P-11.....(ITS 3.3.1 Fn 11) 	M-1	<p>Note: Lower case letters (a, b, and c) denote the numbering correspondences between CTS SRs and ITS SRs.</p> <p>CTS 1.1, "Definitions"</p> <ul style="list-style-type: none"> • COT • RTCOT <p>CTS 3.1.8, "PHYSICS TESTS Exceptions – MODE 2"</p> <ul style="list-style-type: none"> a SR 3.1.8.1 - RTCOT <p>CTS 3.3.1</p> <ul style="list-style-type: none"> b SR 3.3.1.8 - RTCOT c SR 3.3.1.9 - RTCOT <p>-----</p> <p>ITS 1.1, "Definitions"</p> <ul style="list-style-type: none"> • COT <p>ITS 3.1.8</p> <ul style="list-style-type: none"> a SR 3.1.8.1 - COT <p>ITS 3.3.1</p> <ul style="list-style-type: none"> b SR 3.3.1.6 - COT c SR 3.3.1.7 - COT <p>ITS 3.3.2</p> <ul style="list-style-type: none"> b SR 3.3.2.2 - Note c SR 3.3.2.2 - COT <p>ITS 3.3.3</p> <ul style="list-style-type: none"> c SR 3.3.3.2 - COT

(continued)

(continued)

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DOC No.	TS Section 1.0 - Use and Application Description of Change (change numbers added for reference)	Change Type	Affected TS Section and Requirements
M01 (cont'd)	<p>1. (continued)</p> <p>The CTS 1.1 definition of RTCOT is deleted. Current SRs for the RTCOT that are changed to require a COT are the following (cont'd):</p> <ul style="list-style-type: none"> • Once prior to reactor startup, once 4 hours after reducing power < P-10, and once per 92 days, current SR 3.3.1.9 requires performing an RTCOT in accordance with the Setpoint Program on each of the following RTS automatic-protection-instrumentation Functions (Fns) specified by CTS Table 3.3.1-1: <ul style="list-style-type: none"> 2.b Power Range Neutron Flux - Low Setpoint (ITS 3.3.1 Fn 1.b) 4. Intermediate Range Neutron Flux (ITS LCO 3.3.3) • Once prior to reactor startup, once 4 hours after reducing power < P-6, and once per 92 days, current SR 3.3.1.9 requires performing an RTCOT in accordance with the Setpoint Program on the following RTS automatic-protection-instrumentation Function specified by CTS Table 3.3.1-1: <ul style="list-style-type: none"> 5. Source Range Neutron Flux High Setpoint - in MODE 2 below the P-6 (Intermediate Range Neutron Flux) interlocks. (ITS LCO 3.3.2) <p>Each Function requiring performance of an RTCOT by either current SR 3.3.1.8 or current SR 3.3.1.9 also requires performance of a CHANNEL CALIBRATION by either current SR 3.3.1.10 or current SR 3.3.1.11. Therefore, the Functions referencing current SR 3.3.1.8 and SR 3.3.1.9 contain adjustable devices.</p> <p>However, the definition of RTCOT does not explicitly require "adjustments of required alarm, interlock, and trip setpoints" that are "required for channel OPERABILITY such that the setpoints are within the necessary range and accuracy." The current TS bases associated with the RTCOT describe these adjustments, but the bases are intended to clarify, not provide additional requirements. The COT definition explicitly requires these adjustments. Therefore, because the definition of COT more closely aligns with the RTCOT test description provided in the bases, the RTCOT in CTS SR 3.1.8.1, SR 3.3.1.8 and SR 3.3.1.9 is replaced with the COT in corresponding improved TS (ITS) SR 3.1.8.1, SR 3.3.1.6, SR 3.3.1.7, SR 3.3.2.2, and SR 3.3.3.2. (See DOC A024.)</p> <p>Deleting the definition of RTCOT and specifying a COT in its place in improved TS (ITS) SR 3.1.8.1 and ITS SR 3.3.1.6, SR 3.3.1.7, SR 3.3.2.2, and SR 3.3.3.2 are more restrictive because the COT definition explicitly requires adjustments of required alarm, interlock, and trip setpoints, but the RTCOT definition does not.</p>	M-1	<p>(continued)</p> <p>CTS 1.1, "Definitions"</p> <ul style="list-style-type: none"> • COT • RTCOT <p>CTS 3.1.8, "PHYSICS TESTS Exceptions – MODE 2"</p> <ul style="list-style-type: none"> a SR 3.1.8.1 - RTCOT <p>CTS 3.3.1</p> <ul style="list-style-type: none"> b SR 3.3.1.8 - RTCOT c SR 3.3.1.9 - RTCOT <p>-----</p> <p>ITS 1.1, "Definitions"</p> <ul style="list-style-type: none"> • COT <p>ITS 3.1.8</p> <ul style="list-style-type: none"> a SR 3.1.8.1 - COT <p>ITS 3.3.1</p> <ul style="list-style-type: none"> b SR 3.3.1.6 - COT c SR 3.3.1.7 - COT <p>ITS 3.3.2</p> <ul style="list-style-type: none"> b SR 3.3.2.2 - Note c SR 3.3.2.2 - COT <p>ITS 3.3.3</p> <ul style="list-style-type: none"> c SR 3.3.3.2 - COT

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DOC No.	TS Section 1.0 - Use and Application Description of Change (change numbers added for reference)	Change Type	Affected TS Section and Requirements
M01 (cont'd)	<p>2. The current TS (CTS) 1.1 definition of REACTOR TRIP CHANNEL OPERATIONAL TEST (RTCOT) is deleted. The current SRs for the RTCOT are changed to require either a COT or an ACTUATION LOGIC TEST (ALT). The current SR for the RTCOT that is changed to require an ALT is the following:</p> <ul style="list-style-type: none"> Once per 92 days, current SR 3.3.1.7 requires performing an RTCOT on each of the following reactor trip system (RTS) automatic-protection-instrumentation Functions (Fns) specified by CTS Table 3.3.1-1: <ul style="list-style-type: none"> 15.b Safeguards Actuation Input from ESFAS – Automatic (ITS 3.3.4 Fn 1) 19. Automatic Trip Logic (ITS LCO 3.3.6) 20. ADS Stages 1, 2, and 3 Actuation input from ESFAS – Automatic (ITS 3.3.4 Fn 2) 21. Core Makeup Tank Actuation input from ESFAS – Automatic (ITS 3.3.4 Fn 3) <p>Current SR 3.3.1.7 requires an RTCOT to be performed on RTS Automatic Trip Logic and on actuation inputs from the Engineered Safety Feature Actuation System. These functions are logic functions, as described in the associated bases. However, NUREG-1431, Standard TS for Westinghouse Plants, specifies the ACTUATION LOGIC TEST (ALT) for similar functions. In addition, use of the ALT is consistent with testing performed on other trip logic in the current TS. The definition of RTCOT requires testing the channel through the trip logic; however, it does not require that the test provide overlap with the actuated device, as does the definition of ALT. Therefore, it is appropriate to replace the reference to the RTCOT in current SR 3.3.1.7 with a reference to the ACTUATION LOGIC TEST in corresponding ITS SR 3.3.4.1 and SR 3.3.6.1. (See DOC A024.)</p> <p>Deleting the definition of RTCOT and specifying an ACTUATION LOGIC TEST in its place in ITS SR 3.3.4.1 and SR 3.3.6.1 are more restrictive because the ACTUATION LOGIC TEST definition requires that the test provide overlap with the actuated device, but the RTCOT definition does not.</p>	M-1	<p>Note: The lower case letter d denotes the numbering correspondences between the CTS SR and ITS SRs.</p> <p>CTS 1.1, "Definitions"</p> <ul style="list-style-type: none"> ALT RTCOT <p>CTS 3.3.1</p> <p>d SR 3.3.1.7 - RTCOT</p> <hr/> <p>ITS 1.1, "Definitions"</p> <ul style="list-style-type: none"> ALT <p>ITS 3.3.4</p> <p>d SR 3.3.4.1 – ALT</p> <p>ITS 3.3.6</p> <p>d SR 3.3.6.1 - ALT</p>
Types of More Restrictive Changes in TS Section 1.0:			
M-1	Increase in the scope of a surveillance requirement.		

DOC No.	TS Section 2.0 - Safety Limits Description of Change	Change Type	Affected TS Section and Requirements
	None		

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DOC No.	TS Section 3.0 - LCO and SR Applicability Description of Change	Change Type	Affected TS Section and Requirements
	None		
DOC No.	TS Section 3.1 - Reactivity Control Systems Description of Change (change numbers added for reference)	Change Type	Affected TS Section and Requirements
M01 (cont'd)	<p>3. As a result of the deletion of the definition of REACTOR TRIP CHANNEL OPERATIONAL TEST (RTCOT) in TS 1.1, "Definitions," SR 3.1.8.1 is revised to instead require a CHANNEL OPERATIONAL TEST (COT), as follows, with changes indicated by line-out for removed text and bold for added text; included are changes related to DOC A024 as well as DOC M01:</p> <p>Perform a REACTOR TRIP CHANNEL OPERATIONAL TEST COT on power range neutron flux and intermediate range neutron flux channels per SR 3.3.1.8 and SR 3.3.1.9 SR 3.3.1.6, SR 3.3.1.7, and SR 3.3.3.2.</p> <p>The Frequency of "Prior to initiation of PHYSICS TESTS" is unchanged. (See DOC A024 and DOC M01, Items 1 and 2 above, for a listing of affected RTS instrumentation functions and discussion of the technical reasons for the changes.)</p>	M-1	TS 3.1.8, "PHYSICS TESTS Exceptions – MODE 2" <ul style="list-style-type: none"> SR 3.1.8.1
Types of More Restrictive Changes in Improved TS Section 3.1:			
M-1	Increase in the scope of a surveillance requirement.		
DOC No.	TS Section 3.2 - Power Distribution Limits Description of Change	Change Type	Affected TS Section and Requirements
	None		

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DOC No.	TS Section 3.3 - Instrumentation Description of Change (change numbers added for reference)	Change Type	Affected TS Section and Requirements
M01 (cont'd)	<p>Note: In the TS Section 3.3 (ITS Subsections 3.3.1 through 3.3.19) part of Table M, the following conventions are used:</p> <p>A. The vertical bar or "pipe" symbol () is shorthand for "with a completion time of" when used after a quoted required action, and "with a frequency of" when used after a quoted surveillance.</p> <p>B. Current TS is abbreviated by "CTS" and improved (or new) TS is abbreviated by "ITS".</p> <p>C. When technical and editorial changes are indicated in a markup of a quotation of the current requirement, strikeout denotes removed text, and bold denotes added text. In addition, any DOCs associated with each markup are listed for reference. A quoted current requirement with no markup, or other DOC listed, indicates it is retained without change in the improved TS location indicated.</p> <p>4. As a result of the deletion of the definition of REACTOR TRIP CHANNEL OPERATIONAL TEST (RTCOT) in TS 1.1, "Definitions," SRs for performing an RTCOT on reactor trip system (RTS) instrumentation in CTS 3.3.1, "RTS Instrumentation," are revised to instead require either an ACTUATION LOGIC TEST (ALT) or a CHANNEL OPERATIONAL TEST (COT), as indicated by the following markups:</p> <p>Current SR 3.3.1.7 Perform RIGOR ACTUATION LOGIC TEST. 92 days</p> <p>Current SR 3.3.1.8 Perform RIGOR COT in accordance with Setpoint Program. 92 days</p> <p>Current SR 3.3.1.9 Perform RIGOR COT in accordance with Setpoint Program. 92 days (See DOC A024 and A026 for description of changes to the three other Frequencies of current SR 3.3.1.9.)</p> <p>(See DOC A024 and A026, and DOC M01, Items 1 and 2 above, for a listing of affected RTS instrumentation functions and discussion of the technical reasons for the changes.)</p>	M-1	<p>Note: Lower case letters (a, b, and c) denote the numbering correspondences between CTS SRs and ITS SRs</p> <p>CTS 3.3.1 a SR 3.3.1.7 – RTCOT b SR 3.3.1.8 – RTCOT c SR 3.3.1.9 – RTCOT</p> <p>-----</p> <p>ITS 3.3.1 b SR 3.3.1.6 – COT c SR 3.3.1.7 – COT</p> <p>ITS 3.3.2 b SR 3.3.2.2 – Note c SR 3.3.2.2 – COT</p> <p>ITS 3.3.3 c SR 3.3.3.2 – COT</p> <p>ITS 3.3.4 a SR 3.3.4.1 – ALT</p> <p>ITS 3.3.6 a SR 3.3.6.1 – ALT</p>

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DOC No.	TS Section 3.3 - Instrumentation Description of Change (change numbers added for reference)	Change Type	Affected TS Section and Requirements
M02	<p>1. Current TS 3.3.1, "Reactor Trip System (RTS) Instrumentation," does not specify Actions for inoperability of more than two inoperable automatic initiation channels – resulting in entry into LCO 3.0.3 when three or more channels are inoperable.</p> <p>The exceptions to this are the Actions for RTS Function 4, "Intermediate Range Neutron Flux," and RTS Function 5, "Source Range Neutron Flux High Setpoint," which specify Action Conditions for three inoperable channels. (See Table A, DOC A024 Change Items 3.15.1, 3.15.2, 3.16.1, and 3.16.2.) However, for these two Functions, CTS 3.3.1 does not specify an Actions Condition for four inoperable channels – resulting in entry into LCO 3.0.3 when all four Intermediate Range Neutron Flux or Source Range Neutron Flux channels are inoperable.</p> <p>Similarly, for manual actuation, Actions are not currently provided in current TS 3.3.1 for more than one inoperable channel – resulting in entry into LCO 3.0.3 when two manual reactor trip channels are inoperable.</p>	M-7	<p>CTS 3.3.1 Fn 4</p> <ul style="list-style-type: none"> ● Condition G <p>CTS 3.3.1 Fn 5</p> <ul style="list-style-type: none"> ● Condition G <p>-----</p> <p>ITS 3.3.2</p> <p>ITS 3.3.3</p>
	<p>2. Current TS 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," does not specify Actions for inoperability of more than two inoperable automatic initiation channels – resulting in entry into LCO 3.0.3 when three or more channels are inoperable while in Modes 1, 2, 3, and 4, and entry into current LCO 3.0.8 while in Modes 4 and 5. The following current TS Table 3.3.2-1 Functions are exceptions to this in that they contain actions for one required channel inoperable but not for two inoperable channels and are also addressed with this revision:</p> <p>Function 13.b, "Coincident with Startup Feedwater Flow – Low,"</p> <p>Function 18.b, "Reactor Trip, P-4,"</p> <p>Function 20.a, "Control Room Air Supply Radiation – High 2"; and</p> <p>Function 24.a, "Spent Fuel Pool Level – Low."</p> <p>Similarly, for manual actuation, Actions are not currently provided in current TS 3.3.2 for more than one inoperable channel – resulting in entry into LCO 3.0.3 when two manual actuation channels are inoperable.</p>	M-7	<p>CTS 3.3.2 Fn 13.b</p> <p>CTS 3.3.2 Fn 18.b</p> <p>CTS 3.3.2 Fn 20.a</p> <p>CTS 3.3.2 Fn 24.a</p>

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DOC No.	TS Section 3.3 - Instrumentation Description of Change (change numbers added for reference)	Change Type	Affected TS Section and Requirements
M02 (cont'd)	<p>3. Revisions are made to provide new Conditions to address inoperability of all channels as follows:</p> <ul style="list-style-type: none"> • ITS 3.3.1, "RTS Instrumentation," Condition C second portion • ITS 3.3.2, "RTS Source Range Instrumentation," Condition F addition of "or more" • ITS 3.3.3, "RTS Intermediate Range Instrumentation," Condition D addition of "or more" for power levels above P-6, and applying this Action to power levels below P-6, by removing Condition modifier "THERMAL POWER between P-6 and P-10" • ITS 3.3.4, "RTS Engineered Safety Feature Actuation System (ESFAS) Instrumentation," Conditions B and D, second portions • ITS 3.3.5, "RTS Manual Actuation," Conditions B and C, second portions • ITS 3.3.6, "RTS Automatic Trip Logic," Conditions B and D, second portions • ITS 3.3.7, "RTS Trip Actuation Devices," Conditions C and D second portions • ITS 3.3.8, "ESFAS Instrumentation," Condition C (second portion) • ITS 3.3.9, "ESFAS Manual Initiation," Condition C (second portion) • ITS 3.3.11, "ESFAS Startup Feedwater Flow Instrumentation," Condition B (second portion) • ITS 3.3.12, "ESFAS Reactor Trip Initiation," Condition B (second portion) • ITS 3.3.13, "ESFAS Control Room Air Supply Radiation Instrumentation," Conditions C and D (second portions) • ITS 3.3.14, "ESFAS Spent Fuel Pool Level Instrumentation," Condition B (second portion) • ITS 3.3.15, "ESFAS Actuation Logic –Operating," Condition B (second portion) • ITS 3.3.16, "ESFAS Actuation Logic –Shutdown," Conditions B and C (second portions) 	M-7	<p>CTS 3.3.1 • Actions CTS 3.3.2 • Actions ----- ITS 3.3.1 Condition C ITS 3.3.2 Condition F ITS 3.3.3 Condition D ITS 3.3.4 Conditions B and C ITS 3.3.5 Conditions B and C ITS 3.3.6 Conditions B and D ITS 3.3.7 Conditions C and D ITS 3.3.8 Condition C ITS 3.3.9 Condition C ITS 3.3.11 Condition B ITS 3.3.12 Condition B ITS 3.3.13 Conditions C and D ITS 3.3.14 Condition B ITS 3.3.15 Condition B ITS 3.3.16 Condition B</p>
M03	<p>1. Current TS 3.3.3, "Post Accident Monitoring (PAM) Instrumentation," Table 3.3.3-1, "Post-Accident Monitoring Instrumentation," Function (Fn) 18, "Remotely Operated Containment Isolation Valve Position," is renamed as "Penetration Flow Path Remotely Operated Containment Isolation Valve Position." The associated required channels/divisions column is revised from "1/valve," to "2 per penetration flow path." In addition, new Footnote (c) stating "Only one position indication channel is required for penetration flow paths with only one installed control room indication channel," is added to Fn 18 required channels/divisions description in ITS Table 3.3.17-1.</p>	M-3	<p>CTS 3.3.3 • Table 3.3.3-1 Fn 18 ----- ITS 3.3.17 • Table 3.3.17-1 Fn 18 • Table 3.3.17-1 Footnote (c)</p>

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DOC No.	TS Section 3.3 - Instrumentation Description of Change (change numbers added for reference)	Change Type	Affected TS Section and Requirements
Types of More Restrictive Changes in TS Section 3.3:			
M-1	Increase in the scope of a surveillance requirement.		
M-2	Required action specifies placing the unit in a lower operational mode.		
M-3	Impose a more restrictive plant configuration for surveillance testing.		
M-4	Increase in the scope of a required action or addition of a required action.		
M-5	Addition of a surveillance requirement.		
M-6	Increase of a surveillance requirement frequency (i.e., a shorter test interval).		
M-7	Decrease of a required action completion time.		

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DOC No.	TS Section 3.4 – Reactor Coolant System Description of Change (change numbers added for reference)	Change Type	Affected TS Section and Requirements
M05	<p>1. Current TS 3.4.3, "RCS Pressure and Temperature (PT) Limits," Required Action B.2 is revised from "Be in <u>MODE 4</u> with RCS pressure < 500 psig," to "Be in MODE 5." The proposed change also revises the associated Completion Time from 24 hours to 36 hours.</p> <p>TS 3.4.3, Condition A specifies the Required Actions if the requirements of the LCO are not met in Mode 1, 2, 3, or 4. Condition B specifies the actions required to be taken if the Required Actions and associated Completion Times of Condition A are not met. Required Action B.2 currently allows the unit to remain in Mode 4 with RCS pressure < 500 psig. This results in a lack of clarity by not explicitly providing actions when in MODE 4 with RCS pressure < 500 psig. Because Condition B is applicable in MODE 4, it should require the unit to exit MODE 4.</p> <p>The proposed change ensures a proper progression between Condition B and Condition C, which is applicable if the requirements of the LCO are not met any time in other than MODE 1, 2, 3, or 4. Currently, there is a gap in that Condition B, Required Action B.2, places the unit in Mode 4 with RCS pressure < 500 psig while Condition C would not be applied if the requirements of the LCO are not met while in Mode 4. In addition to the change to the Condition B end state, this change revises the Completion Time to be consistent with NUREG-1431 and with other Completion Times in the TS that are associated with placing the unit in Mode 5. This change in Completion Time is necessary to ensure a safe and orderly shutdown to Mode 5.</p> <p>This change is designated as more restrictive because it results in placing the unit in a lower Mode of operation than currently required.</p>	M-2	<p>TS 3.4.3</p> <ul style="list-style-type: none"> • Required Action B.2 • Required Action B.2 Completion Time
M06	<p>The proposed changes under DOC M06 were withdrawn by the licensee in its response to RAI 16-5</p> <p><i>The current TS 3.4.4, "RCS Loops," LCO is modified by Note 2 that states: "No RCP shall be started when the RCS temperature is ≥ 350°F unless pressurizer level is < 92%," and Note 3 that states: "No RCP shall be started with any RCS cold leg temperature ≤ 350°F unless the secondary side water temperature of each steam generator (SG) is ≤ 50°F above each of the RCS cold leg temperatures and the RCP is started at ≤ 25% of RCP speed." Notes 2 and 3 are deleted from TS 3.4.4, and are incorporated in TS 3.4.3 as LCO 3.4.3.b and LCO 3.4.3.c.</i></p> <p><i>The current TS 3.4.8, "Minimum RCS Flow," LCO is modified by Note 2 that states: "No RCP shall be started when the RCS temperature is ≥ 350°F unless pressurizer level is < 92%," and Note 3 that states: "No RCP shall be started with any RCS cold leg temperature ≤ 350°F unless the secondary side water temperature of each steam generator (SG) is ≤ 50°F above each of the RCS cold leg temperatures and the RCP is started at ≤ 25% of RCP speed." Notes 2 and 3 are deleted from TS 3.4.8, and are incorporated in TS 3.4.3 as LCO 3.4.3.b and LCO 3.4.3.c.</i></p> <p>(continued)</p>	N/A	None

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DOC No.	TS Section 3.4 – Reactor Coolant System Description of Change (change numbers added for reference)	Change Type	Affected TS Section and Requirements
M06 (cont'd)	<p>(continued) The current TS 3.4.14, "Low Temperature Overpressure Protection (LTOP) System," LCO is modified by two notes. Note 1 states: "No reactor coolant pump (RCP) shall be started when the RCS temperature is $\geq 350^{\circ}\text{F}$ unless pressurizer level is $< 92\%$." Note 2 states: "No RCP shall be started with any RCS cold leg temperature $\leq 350^{\circ}\text{F}$ unless the secondary side water temperature of each steam generator (SG) is $\leq 50^{\circ}\text{F}$ above each of the RCS cold leg temperatures and the RCP is started at $\leq 25\%$ of RCP speed." Notes 1 and 2 are deleted from TS 3.4.14, and are incorporated in TS 3.4.3, "RCS Pressure and Temperature (P/T) Limits," as LCO 3.4.3.b and LCO 3.4.3.c.</p> <p>The current TS 3.4.3 LCO is reformatted as LCO 3.4.3.a for consistency with the changes described above.</p>	N/A	None
M07	<p>1 The current TS 3.4.6, "Pressurizer Safety Valves," Applicability Note is revised to include a requirement that "One pressurizer safety valve at a time may be inoperable for hot lift setting adjustment."</p> <p>2 TS 3.4.6 Applicability Note states "The lift settings are not required to be within the LCO limits during MODES 3 and 4 for the purpose of setting the pressurizer safety valves under ambient (hot) conditions." The Note allows entry into MODES 3 and 4 with the lift setpoints outside the LCO limits. This permits testing and examination of the safety valves at high pressure and temperature near their normal operating range, but only after the valves have had a preliminary cold setting. The cold setting gives assurance that the valves are OPERABLE near their design condition. However, the associated Bases go further, stating that "Only one valve at a time will be removed from service for testing." This prohibition, limiting how lift settings and testing are performed, is not stated in the Note. The proposed Note provides assurance that during Modes 3 and 4, at least one pressurizer safety valve that has had a preliminary cold setting is available to provide overpressure protection. This change is designated as more restrictive because it explicitly limits the number of pressurizer safety valves that can be inoperable during hot lift setting activities.</p>	M-3	TS 3.4.6 • Applicability Note
M08	<p>1. Current TS 3.4.8, "Minimum RCS Flow," Condition A is revised to add a Note stating "Required Action A.2 shall be completed prior to starting any RCP whenever this Condition is entered."</p> <p>LCO 3.4.8 requires that at least one Reactor Coolant Pump (RCP) shall be in operation with a total flow through the core of at least 3,000 gpm. In the event no RCP is in operation, Required Action A.1 requires all sources of unborated water to be isolated and Required Action A.2 requires current SR 3.1.1.1 to be performed. Performing SR 3.1.1.1 assures that if the boron concentration in the Reactor Coolant System (RCS) has been reduced and not detected by the source range instrumentation, prompt action may be taken to restore the required Shutdown Margin. However, once Required Action A.1 is performed (all sources of unborated water are isolated within 1 hour) (continued)</p>	M-4	CTS 3.4.8 • Condition A ITS 3.4.8 • Condition A Note

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DOC No.	TS Section 3.4 – Reactor Coolant System Description of Change (change numbers added for reference)	Change Type	Affected TS Section and Requirements
M08 (cont'd)	<p>1. (continued)</p> <p>the LCO is no longer applicable because its Applicability is "MODES 3, 4, and 5, whenever the reactor trip breakers are open and with unborated water sources not isolated from the RCS." Therefore, Required Action A.2 would not be required to be completed once all unborated water sources are isolated because the Applicability for the LCO is exited. Also, placing at least one RCP in operation is an implicit action when in Condition A (i.e., restore compliance with LCO), even though it is not explicitly stated. The proposed Note ensures that the Shutdown Margin is verified prior to starting any RCP once Condition A is entered, even if all unborated water sources are isolated.</p> <p>This change is designated as more restrictive because it adds a Note to ensure that Required Action A.2 is completed once Condition A is entered, even if all unborated water sources are isolated and the Applicability for the LCO is exited.</p>	M-4	<p>CTS 3.4.8</p> <ul style="list-style-type: none"> • Condition A <p>ITS 3.4.8</p> <ul style="list-style-type: none"> • Condition A Note
M09	<p>1. Current TS 3.4.14, "Low Temperature Overpressure Protection (LTOP) System," Condition C, is revised from "The RNS suction relief valve inoperable," to "Required LTOP method inoperable for reasons other than Condition A or B."</p> <p>LCO 3.4.14 requires accumulators to be isolated and either the Normal Residual Heat Removal System (RNS) suction relief valve with lift setting within the limit specified in the Pressure Temperature Limits Report (PTLR), or the RCS depressurized with an RCS vent of ≥ 4.15 square inches.</p> <p>Current TS 3.4.14 provides ACTIONS in the event an accumulator is not isolated when required (Condition A) and for an inoperable RNS suction relief valve (Condition C). However, no Condition currently addresses the ACTIONS required to be taken in the event the required method of LTOP consisting of RCS depressurized and an RCS vent of ≥ 4.15 square inches is not Operable in compliance with LCO 3.4.14.b.</p> <p>With respect to TS 3.4.14, the LCO is Applicable in Mode 4 when any cold leg temperature is $\leq 275^\circ\text{F}$; in Mode 5; and in Mode 6 when the reactor vessel head is on. If the required method of LTOP consists of the depressurized RCS with an RCS vent of ≥ 4.15 square inches, and the vent is found to be covered such that sufficient pressure protection does not exist, the current TS 3.4.14 Actions would result in entry into the requirements of LCO 3.0.3. LCO 3.0.3 requires, in part, that when an LCO is not met and an associated Action is not provided, that the unit shall be placed in a</p> <p>(continued)</p>	M-4	<p>TS 3.4.14</p> <ul style="list-style-type: none"> • Condition C

Table M
More Restrictive Changes

DOC No.	TS Section 3.4 – Reactor Coolant System Description of Change (change numbers added for reference)	Change Type	Affected TS Section and Requirements
M09 (cont'd)	<p>1. (continued)</p> <p>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: a) Mode 3 within 7 hours; and b) Mode 4 within 13 hours; and c) Mode 5 within 37 hours. Therefore, if in Mode 4 with cold leg temperature ≤ 275°F with an insufficient RCS vent, LCO 3.0.3 would require that action be initiated within 1 hour to place the unit in Mode 5 within 37 hours. LCO 3.0.3 would then require no further actions; the unit would still be in the Mode of applicability without sufficient LTOP. Entry into LCO 3.0.3 would result in no actions if the unit is in Mode 5 or Mode 6 when the reactor vessel head is on with an insufficient RCS vent. The proposed change revises Condition C such that it applies to either the RNS suction relief valve or RCS depressurized with a vent path LTOP methods. In either case, the existing Required Actions and Completion Times specified in Required Action C.1 and Required Action C.2 are reasonable and result in restoration of LTOP.</p> <p>This change is designated as more restrictive because it results in requiring specific ACTIONS where none are currently specified.</p>	M-4	<p>TS 3.4.14</p> <ul style="list-style-type: none"> • Condition C
Types of More Restrictive Changes in TS Section 3.4:			
M-2	Required action specifies placing the unit in a lower operational mode.		
M-3	Impose a more restrictive plant configuration for surveillance testing.		
M-4	Increase in the scope of a required action or addition of a required action.		

Table M
More Restrictive Changes

DOC No,	TS Section 3.5 - Emergency Core Cooling Systems Description of Change (change numbers added for reference)	Change Type	Affected TS Section and Requirements
M10	<p>1. Current TS 3.5.4, "Passive Residual Heat Removal Heat Exchanger (PRHR HX) – Operating," and current TS 3.5.5, "Passive Residual Heat Removal Heat Exchanger (PRHR HX) – Shutdown, Reactor Coolant System (RCS) Intact," are revised to delete the LCO Note. The Note requirements will be replaced by a new SR 3.5.4.4 to periodically verify one Loop 1 RCP is in operation, but which is only required to be met when one or more RCPs are in operation.</p> <p>Current TS 3.5.4 requires that the Passive Residual Heat Removal Heat Exchanger (PRHR HX) shall be Operable. The LCO has a Note which states, "When any reactor coolant pumps (RCPs) are operating, at least one RCP must be operating in the loop with the PRHR HX, Loop 1." The TS Bases state that the Note "requires a reactor coolant pump (RCP) to be operating in the loop with the PRHR HX, Loop 1, if any RCPs are operating. If RCPs are only operating in Loop 2 and no RCPs are operating in Loop 1, there is a possibility there may be reverse flow in the PRHR HX." This Note provides a constraint on operability of the PRHR HX since not having at least one RCP operating in Loop 1, if any RCPs are operating, could render the PRHR HX inoperable. An operational condition such as this should be surveillance tested to ensure that it is met. A new SR 3.5.4.4 is added.</p> <p>Current TS 3.5.5 has the same LCO Note that states, "When any reactor coolant pumps (RCPs) are operating, at least one RCP must be operating in the loop with the PRHR HX, Loop 1." This Note is deleted as a result of this change. A corresponding SR is not added to TS 3.5.5 because SR 3.5.5.1 states that the SRs of TS 3.5.4 are applicable. Thus, the new SR added to TS 3.5.4 will also be applicable to TS 3.5.5.</p> <p>This change is more restrictive since it adds a new SR to the TS.</p>	M-5	<p>CTS 3.5.4</p> <ul style="list-style-type: none"> • LCO Note CTS 3.5.5 • LCO Note <hr/> <p>ITS 3.5.4</p> <ul style="list-style-type: none"> • SR 3.5.4.4 and surveillance column Note
<p>Types of More Restrictive Changes in TS Section 3.5:</p> <p>M-5 Addition of a surveillance requirement.</p>			

Table M
More Restrictive Changes

DOC No.	TS Section 3.6 - Containment Systems Description of Change (change numbers added for reference)	Change Type	Affected TS Section and Requirements
M11	<p>Current TS 3.6.3, "Containment Isolation Valves," is revised as follows:</p> <ol style="list-style-type: none"> <li data-bbox="315 667 1286 1787"> <p>LCO 3.6.3 is revised from "Each containment isolation valve shall be OPERABLE," to "Each containment isolation valve shall be OPERABLE, except for the containment isolation valves associated with closed systems."</p> <p>Current TS 3.6.3 provides the requirement for the containment isolation valve function. Some of the valves that are containment isolation valves are also required to be Operable to meet other safety related functions, and these requirements are provided in separate LCOs. Thus, for certain containment isolation valves on closed systems, the same valve has two separate TS that cover its requirements.</p> <p>Current TS 3.7.1 provides requirements for MSSVs, current TS 3.7.2 provides requirements for the MSIVs, current TS 3.7.3 provides requirements for the MFIVs, current TS 3.7.7 provides requirements for the startup feedwater isolation valves, and current TS 3.7.10 provides requirements for the power operated relief valve (PORV) block valves and SG blowdown isolation valves.</p> <p>In lieu of including these valves in both TS 3.6.3 and their individual Specification, TS 3.6.3 is revised to exclude all closed system containment isolation valves. The remaining closed system containment isolation valves that are not covered by TS 3.7.1, TS 3.7.2, TS 3.7.3, TS 3.7.7, and TS 3.7.10, are MSIV bypass valves and the main steam line drain valves. The requirements for these containment isolation valves are added to revised TS 3.7.2 with the other steam line flow path isolation valves.</p> <p>All of the moved containment isolation valves are associated with a closed system and they are the only closed system containment isolation valves. The individual Specifications, where these valves are moved to, include the same requirements as currently in TS 3.6.3, or have been revised to include the requirements from current TS 3.6.3.</p> <p>Since the applicability of current TS 3.6.3 includes MODES 1, 2, 3, and 4, and that of Specifications 3.7.1, 3.7.2, 3.7.3, 3.7.7, and 3.7.10 only include MODES 1, 2, 3, and part of MODE 4, the changes to TS 3.7.1, TS 3.7.2, TS 3.7.3, TS 3.7.7, and TS 3.7.10 for these closed system containment isolation valves are either consistent with or more restrictive than those in current TS 3.6.3.</p> <li data-bbox="1149 667 1286 1787"> <p>The Condition A and Condition B Notes, which state "Only applicable to penetration flow paths with two containment isolation valves," are deleted.</p> <p>Deleting TS 3.6.3 Condition A and Condition B Notes, is consistent with excluding closed-system containment isolation valves from TS 3.6.3.</p> 	M-1	<p>CTS 3.6.3</p> <ul style="list-style-type: none"> LCO <p>ITS 3.6.3</p> <ul style="list-style-type: none"> LCO
		A-1	<p>CTS 3.6.3</p> <ul style="list-style-type: none"> Condition A Note Condition B Note

Table M
More Restrictive Changes

DOC No.	TS Section 3.6 - Containment Systems Description of Change (change numbers added for reference)	Change Type	Affected TS Section and Requirements
M11 (cont'd)	3. Action C is deleted. Current Condition D is renumbered to Condition C and current Required Actions D.1 and D.2 are renumbered to Required Actions C.1 and C.2. Deleting TS 3.6.3 Action C is consistent with excluding closed-system containment isolation valves from TS 3.6.3.	A-1	CTS 3.6.3 • Action C
M12	1. Current TS 3.6.5, "Containment Air Temperature," SR 3.6.5.1 Frequency is changed from 24 hours to 12 hours. SR 3.6.5.1 verifies average containment air temperature is within limit. This changes the Frequency for performing this verification from 24 hours to 12 hours. The proposed Frequency is consistent with the containment pressure surveillance, SR 3.6.4.1, and with SR 3.6.10.1, which requires verification of containment inside and outside differential temperature to be within the specified limit. The impact of this change is insignificant since the containment air temperature is also required at this increased Frequency in accordance with SR 3.6.10.1. This change is more restrictive since the Surveillance is proposed to be performed more frequently.	M-6	TS 3.6.5 • SR 3.6.5.1 Frequency
M13	1. CTS 3.6.6, "Passive Containment Cooling System (PCS) - Operating," provides the requirements for the PCS in MODES 1, 2, 3, and 4. CTS 3.6.7, "Passive Containment Cooling System (PCS) - Shutdown," provides the requirements for the PCS in MODES 5 and 6 with the calculated reactor decay heat > 6.0 MWt. These two Specifications have been combined into one Specification, ITS 3.6.6, "Passive Containment Cooling System (PCS):" Specifically, CTS 3.6.7 is deleted and CTS 3.6.6 is revised as follows: 1.1 The Applicability for CTS 3.6.6 is revised to include the CTS 3.6.7 Applicability of "MODES 5 and 6 with the reactor decay heat > 6.0 MWt." Note that the elimination of the term "calculated" in the MODES 5 and 6 Applicability in CTS 3.6.7 is discussed in DOC L14. The CTS 3.6.6 LCO statement is unchanged since CTS 3.6.6 and CTS 3.6.7 have identical LCO statements. This change to the Applicability is administrative since the ITS 3.6.6 Applicability spans the same operational conditions as the combined Applicabilities of the two current Specifications, which have identical LCO statements.	A-1	CTS 3.6.6 • Applicability CTS 3.6.7 ITS 3.6.6 • Applicability
	1.2 TS 3.6.6 Condition D, first Condition, is revised to include the phrases "of Condition A, B, or C," and "in MODE 1, 2, 3, or 4." This change is necessitated by the combining of CTS 3.6.6 and CTS 3.6.7 and the phrasing is consistent with TSTF-GG-05-01, and is an administrative change that does not result in any technical change.	A-2.t	CTS 3.6.6 • Condition D CTS 3.6.7 ITS 3.6.6 • Condition D

Table M
More Restrictive Changes

DOC No.	TS Section 3.6 - Containment Systems Description of Change (change numbers added for reference)	Change Type	Affected TS Section and Requirements
M13 (cont'd)	<p>1.3 TS 3.6.6 Condition D, second Condition, is revised to include the phrase "in MODE 1, 2, 3, or 4." This change is necessitated by the combining of CTS 3.6.6 and CTS 3.6.7 and the phrasing is consistent with TSTF-GG-05-01, Section 4.1.6.i.iv, and is an administrative change that does not result in any technical change.</p>	A-2.t	<p>TS 3.6.6</p> <ul style="list-style-type: none"> • Condition D
	<p>1.4 TS 3.6.6 Actions E and F are added.</p> <p>These changes are necessitated by the combining of CTS 3.6.6 and CTS 3.6.7. The current TS 3.6.7 Action D are split up into two separate Actions, proposed TS 3.6.6 Actions E and F.</p> <p>The proposed Conditions E and F specify the Mode in which each is applicable, so the Mode specific words from current TS 3.6.7 Required Actions D.1.1 and D.1.2 are deleted.</p> <p>The two requirements (Reactor Coolant System boundary intact and pressurizer level > 20%) in current TS 3.6.7 Required Action D.1.1 have been reordered for clarity in proposed TS 3.6.6 Required Action E.1, with the pressurizer level requirement appearing first.</p> <p>Current SR 3.6.7.1 is deleted since it is only a cross reference to perform the SRs of current TS 3.6.6.</p> <p>Current TS 3.6.7 Actions A, B, and C are identical to current TS 3.6.6 Actions A, B, and C. However, the effect of this change is more restrictive because current TS 3.6.7 Actions A, B, or C could have been entered as a result of a required unit shutdown by current TS 3.6.6 and the Action Completion Times would have begun anew for the same inoperabilities. Thus, combining the two Specifications into a single Specification results in the potential for not allowing the additional restoration times of current TS 3.6.7 Actions A, B, and C, after the unit is shut down to Mode 5 in accordance with current TS 3.6.6 Action D.</p> <p>These change are more restrictive due to eliminating the separate restoration times when in Mode 5 or 6.</p>	M-7	<p>CTS 3.6.7</p> <ul style="list-style-type: none"> • Condition D ITS 3.6.6 • Condition E • Condition F
2.	<p>CTS 3.6.8, "Containment Penetrations," CTS 3.6.9, "pH Adjustment," and CTS 3.6.10, "Vacuum Relief Valves," are renumbered as TS 3.6.7, TS 3.6.8, and TS 3.6.9, respectively.</p> <p>Renumbering is administrative because the current technical requirements are unchanged.</p>	A-1	<p>CTS 3.6.8</p> <p>CTS 3.6.9</p> <p>CTS 3.6.10</p> <p>-----</p> <p>ITS 3.6.7</p> <p>ITS 3.6.8</p> <p>ITS 3.6.9</p>

Table M
More Restrictive Changes

DOC No.	TS Section 3.6 - Containment Systems Description of Change (change numbers added for reference)	Change Type	Affected TS Section and Requirements
M14	<p>1. Current TS 3.6.6, "Passive Containment Cooling System (PCS) – Operating," SR 3.6.6.1 requires verification that the water storage tank temperature is > 40°F and < 120°F at a Frequency of every 7 days and every 24 hours when the water storage tank temperature is verified < 50°F or > 100°F. The Frequency for this SR is changed to be 24 hours.</p> <p>Current SR 3.6.6.1 verifies the water storage tank temperature is within the limits assumed in the safety analysis. This is required to be verified every 7 days, and every 24 hours after the tank temperature is determined to be < 50°F or > 100°F.</p> <p>In lieu of having two Frequencies, one which starts when the temperature nears the acceptance criteria, a single Frequency is proposed. SR 3.6.6.1 includes only a 24 hour Frequency. Even without this change, to assure compliance that the 24 hour monitoring is not required, temperature would have to be verified each 24 hour period. As such, the presentation of only a 24-hr Frequency eliminates unnecessary tracking complexity.</p> <p>This change is more restrictive, since it requires plant personnel to more frequently document performance of the SR.</p>	M-6	TS 3.6.6 SR 3.6.6.1 Frequency
	<p>2. Current TS 3.6.6, SR 3.6.6.3 requires verification that each passive containment cooling system power operated and automatic valve in each flow path that is not locked, sealed, or otherwise secured in position, is in the correct position. The SR is changed to also include manual valves in this verification.</p> <p>Current SR 3.6.6.3 ensures that the proper flow paths exist for passive containment cooling system operation. However, the verification does not currently require the manual valves in the flow path to be verified. It only requires the power operated and automatic valves that are not locked sealed or otherwise secured in position to be verified. Proposed SR 3.6.6.3 will require the manual valves to be verified if they are not locked sealed or otherwise secured in position. This ensures that any valve that could possibly be in the incorrect position to be periodically checked.</p> <p>This change is more restrictive since it requires additional valves that could impact the flow paths to be periodically verified in their correct position, and is consistent with similar Surveillances for system valve lineup verifications.</p>	M-1	TS 3.6.6 • SR 3.6.6.3

Table M
More Restrictive Changes

DOC No.	TS Section 3.6 - Containment Systems Description of Change (change numbers added for reference)	Change Type	Affected TS Section and Requirements
Types of More Restrictive Changes in TS Section 3.6:			
M-1	Increase in the scope of a surveillance requirement.		
M-6	Increase of a surveillance requirement frequency (i.e., a shorter test interval).		
M-7	Decrease of a required action completion time.		
Types of Administrative Changes in TS Section 3.6:			
A-1	Editorial change to conform to phrasing convention and terminology of NUREG-1431, Rev. 4.		
A-2	Editorial change to conform to the industry improved standard TS writer's guide, TSTF-GG-05-01. See Table A-2 at End of Table A for breakdown of subtypes within Type A-2.		

Table M
More Restrictive Changes

DOC No.	TS Section 3.7 - Plant Systems Description of Change (change numbers added for reference)	Change Type	Affected TS Section and Requirements
M11 (cont'd)	4. The following changes are necessitated by the combining of CTS 3.6.3 requirements for containment isolation valves in closed systems to TS 3.7.1, and are administrative changes that do not result in any technical change. Current TS 3.7.1, "Main Steam Safety Valves (MSSVs)," is revised as follows: 4.1 The Applicability is revised from "MODES 1, 2, and 3" and "MODE 4 with the Reactor Coolant System (RCS) not being cooled by the Normal Residual Heat Removal System (RNS)" to "MODES 1, 2, 3, and 4."	A-1	TS 3.7.1 • Applicability
	4.2 New Applicability Note is added, stating "The MSSVs are not required to be OPERABLE for opening in MODE 4 when the Reactor Coolant System (RCS) is being cooled by the Normal Residual Heat removal System (RNS)."	A-1	CTS 3.7.1 • Applicability ITS 3.7.1 • Applicability Note
	4.3 Current Condition A is revised from "...MSSVs inoperable" to "...MSSVs inoperable for opening ."	A-1	TS 3.7.1 • Condition A
	4.4 New Action B for "One or both steam generators with one or more MSSVs inoperable for closing ," with Required Action B.1 stating "Restore MSSV to OPERABLE status" within "72 hours."	A-1	CTS 3.7.1 ITS 3.7.1 • Condition B
	4.5 Current Condition B and associated Required Actions are renumbered as Action C.	A-1	CTS 3.7.1 • Condition B ITS 3.7.1 • Condition C
	4.6 Current Condition B, first Condition is revised from "Required Action and associated Completion Time not met" to "Required Action and associated Completion Time of Condition A not met."	A-2.t	CTS 3.7.1 • Condition B ITS 3.7.1 • Condition C
	4.7 Current Condition B, second Condition is revised from "...MSSVs inoperable" to "...MSSVs inoperable for opening ."	A-1	CTS 3.7.1 • Condition B ITS 3.7.1 • Condition C
	4.8 New Action D for "Required Action and associated Completion Time of Condition B not met" with Required Action D.1 stating "Be in MODE 3" within "6 hours" and Required Action D.2 stating "Be in MODE 5" within "36 hours."	A.2.t	CTS 3.7.1 ITS 3.7.1 • Condition D

Table M
More Restrictive Changes

DOC No.	TS Section 3.7 - Plant Systems Description of Change (change numbers added for reference)	Change Type	Affected TS Section and Requirements
M11 (cont'd)	5. The following changes are necessitated by the combining of CTS 3.6.3 requirements for containment isolation valves in closed systems to TS 3.7.2, and are administrative changes that do not result in any technical change. Current TS 3.7.2, "Main Steam Isolation Valves (MSIVs)," is revised as follows:	A-1	TS 3.7.2 • LCO
	5.1 LCO 3.7.2 is revised to include the MSIV bypass valves and main steam line drain valves as part of the LCO requirements, specifically: "b. MSIV bypass valves;" and "c. Main steam line drain valves."		
	5.2. CTS 3.7.2 Applicability as it pertains to MSIVs only is revised from "MODE 1," and "MODES 2, 3, and 4 except when steam flow is isolated," to "MODES 1, 2, 3, and 4." (See DOC M15 for the same change to TS 3.7.2 Applicability as it relates to the non-containment isolation valves, turbine stop valves, turbine control valves, turbine bypass valves and moisture separator reheater 2nd stage steam isolation valves.)	A-1	TS 3.7.2 • Applicability
	5.3 New TS 3.7.2 Condition E is added, with Condition E stating "One or more MSIV bypass or main steam line drain valves inoperable." Required Actions E.1 and E.2 and associated Completion Times are moved from TS 3.6.3 current Required Actions C.1 and C.2.	A-1	CTS 3.7.2 ITS 3.7.2 • Condition E
	5.4 CTS 3.7.2 Condition E and associated Required Actions are renumbered as Action F and revised to include reference to new Condition E.	A-1	CTS 3.7.2 • Condition E ITS 3.7.2 • Condition F
	5.5 New TS 3.7.2 Required Action F.3 as it pertains to MSIVs only is added, stating to "Be in MODE 5" in 36 hours. (See DOC M15 for the same change to TS 3.7.2 as it relates to the non-containment isolation valves, turbine stop valves, turbine control valves, turbine bypass valves and moisture separator reheater 2nd stage steam isolation valves.)	A-1	CTS 3.7.2 • Condition E ITS 3.7.2 • Action F.3
5.6 New SR 3.7.2.3 stating "Verify the isolation time of each MSIV bypass valve and main steam line drain isolation valve is within limits," with Frequency of "In accordance with the Inservice Testing Program," and new SR 3.7.2.4 stating "Verify each MSIV bypass valve and main steam line drain isolation valve actuates to the isolation position on an actual or simulated actuation signal," with Frequency of "24 months," are added. These new SRs are similar to SR 3.6.3.4 and SR 3.6.3.5 in TS 3.6.3.	A-1	CTS 3.7.2 ITS 3.7.2 • SR 3.7.2.3	

Table M
More Restrictive Changes

DOC No.	TS Section 3.7 - Plant Systems Description of Change (change numbers added for reference)	Change Type	Affected TS Section and Requirements
M11 (cont'd)	6. The following changes are necessitated by the combining of CTS 3.6.3 requirements for containment isolation valves in closed systems to TS 3.7.3, and are administrative changes that do not result in any technical change.	A-1	TS 3.7.3 • Applicability
	Current TS 3.7.3, "Main Feedwater Isolation and Control Valves (MFIVs and MFCVs)," is revised, as it pertains to MFIVs only, as follows:		
	6.1 CTS 3.7.3 Applicability is revised from "MODES 1, 2, 3, and 4, except when the MFIVs or associated MFCV are closed and deactivated," to "MODES 1, 2, 3, and 4." (See DOC M15 for the same change to TS 3.7.3 Applicability as it relates to the MFCV.)		
	6.2 CTS 3.7.3 Required Action D.3.1, which allows the affected flow path to be isolated in lieu of being in MODE 5, is deleted.	M-2	TS 3.7.3 • Action D.3
	7. The following changes are necessitated by the combining of CTS 3.6.3 requirements for containment isolation valves in closed systems to TS 3.7.7, and are administrative changes that do not result in any technical change.	A-1	TS 3.7.7 • Applicability
	Current TS 3.7.7, "Startup Feedwater Isolation and Control Valves," is revised as it pertains to startup feedwater isolation valves only as follows:		
	7.1 CTS 3.7.7 Applicability is revised from "MODES 1, 2, 3, and 4 except when the startup feedwater flow paths are isolated," to "MODES 1, 2, 3, and 4." (See DOC M15 for the same change to TS 3.7.7 Applicability as it relates to the Startup Feedwater Control Valves.)		
	7.2 Required Action C.3 is revised from "Isolate the affected flow path(s)," to " Be in MODE 5. " (See DOC M15 for the same change to TS 3.7.7 as it relates to Startup Feedwater Control Valves.)	M-2	CTS 3.7.7 • Action C.3
7.3 New SR 3.7.7.2 stating "Verify each startup feedwater isolation and control valve actuates to the isolation position on an actual or simulated actuation signal," with Frequency of "24 months," is added. This new SR is similar to SR 3.6.3.5 in TS 3.6.3.	M-5	CTS 3.7.7 ITS 3.7.7 • SR 3.7.7.2	
8. The following changes are necessitated by the combining of CTS 3.6.3 requirements for containment isolation valves in closed systems to TS 3.7.10, and are administrative changes that do not result in any technical change. Current TS 3.7.10, "Steam Generator (SG) Isolation Valves," is revised as follows:	A-1	CTS 3.7.10 • Applicability ITS 3.7.10 • Applicability • Applicability Note	

Table M
More Restrictive Changes

DOC No.	TS Section 3.7 - Plant Systems Description of Change (change numbers added for reference)	Change Type	Affected TS Section and Requirements
M11 (cont'd)	8.1 Current Applicability of "MODES 1, 2, and 3, Mode 4 with the Reactor Coolant System (RCS) not being cooled by the Normal Residual Heat Removal System (RNS)" is revised to "MODES 1, 2, 3, and 4." The Applicability is further revised to add a new Note stating: "PORV OPERABILITY is not required in MODE 4 with Reactor Coolant System (RCS) being cooled by the Normal Residual Heat Removal System (RNS)."	A-1	CTS 3.7.10 • Applicability ITS 3.7.10 • Applicability Applicability Note
	8.2 Required Action A.2 is added to Action A stating: "Verify the affected flow path is isolated" with a Completion Time of "Once per 31 days." This Required Action is also modified by two Notes: 1. Isolation devices in high radiation areas may be verified by use of administrative means, and 2. Isolation devices that are locked, sealed, or otherwise secured may be verified by administrative means.	M-4	CTS 3.7.10 • Action A ITS 3.7.10 • Action A.2 and Notes
	8.3 New Required Action E.3 is added stating: "Be in MODE 5" in 36 hours. New Required Action E.3 also is provided with a Note stating: "Not applicable for inoperable PORV(s)."	M-2 M-4	CTS 3.7.10 • Action E ITS 3.7.10 • Action E.3 and Note
	8.4 New SR 3.7.10.2 stating "Verify the isolation time of each SG PORV block valve and SG blowdown isolation valve is within limits," with Frequency of "In accordance with the Inservice Testing Program," and new SR 3.7.10.3 stating "Verify each SG PORV block valve and SG blowdown isolation valve actuates on an actual or simulated actuation signal," with Frequency of "24 months," are added. These new SRs are similar to SR 3.6.3.4 and SR 3.6.3.5 in TS 3.6.3.	M-5	CTS 3.7.10 ITS 3.7.10 • SR 3.7.10.2 • SR 3.7.10.3

Table M
More Restrictive Changes

DOC No.	TS Section 3.7 - Plant Systems Description of Change (change numbers added for reference)	Change Type	Affected TS Section and Requirements
M15	<p>1. Current TS 3.7.2, "Main Steam Isolation Valves (MSIVs)," as it relates to the non-containment isolation valves; turbine stop valves, turbine control valves, turbine bypass valves and moisture separator reheater 2nd stage steam isolation valves, is revised as follows:</p> <p>1.1 TS 3.7.2 current Applicability is Mode 1, and Modes 2, 3, and 4 <u>except when steam flow is isolated</u>. The Applicability is changed to be Modes 1, 2, 3, and 4, with no exceptions.</p> <p>When the unit is in Mode 2, 3, or 4, LCO 3.7.2 currently does not apply to the valves whose flow path is isolated. Thus, when a main steam flow path isolation valve (e.g., a turbine stop valve) is inoperable in Mode 2, 3, or 4, once the affected steam flow path is isolated as required by Required Action D.1, LCO 3.7.2 would not apply and the periodic verification of Required Action D.2 would not be required. Similar to the Applicability of current TS 3.6.3, the current TS 3.7.2 Applicability is changed to not provide an exception once the affected flow path is isolated. The main steam flow path isolation valves will remain required to be Operable in Modes 2, 3, and 4, even when the affected flow path is isolated. This change will ensure that the periodic verification of Required Action D.2 is performed as long as a valve in the affected flow path remains inoperable. This change is acceptable since it ensures the flow path is periodically verified to be in the post accident state (i.e., isolated) anytime when in Mode 2, 3, and 4 with an associated isolation valve inoperable.</p> <p>This change is more restrictive because the scope of Required Action D.2 is increased as a result of the revised Applicability.</p>	M-4	<p>TS 3.7.2</p> <ul style="list-style-type: none"> • Applicability
	<p>1.2 New TS 3.7.2 Required Action F.3 requiring the Unit to be in Mode 5 within 36 hours is added.</p> <p>Due to the Applicability change, new Required Action F.3 is added to ensure that when conditions warrant, the Applicability of the LCO is exited. The Applicability change and addition of new Required Action F.3 for the MSIVs is discussed in DOC M11.</p> <p>This change is more restrictive because the Unit is placed in a lower Mode.</p>	M-2	<p>ITS 3.7.2</p> <ul style="list-style-type: none"> • Required Action F.3

Table M
More Restrictive Changes

DOC No.	Description of Change (change numbers added for reference)	Change Type	Affected TS Section and Requirements
M15 (cont'd)	<p>TS Section 3.7 - Plant Systems</p> <p>Description of Change (change numbers added for reference)</p> <p>3. Current TS 3.7.3, "Main Feedwater Isolation and Control Valves (MFIVs and MFCVs)," as it relates to the MFCVs is revised as follows:</p> <p>TS 3.7.3 current Applicability is Modes 1, 2, 3, and 4 except when the MFIVs or associated MFCVs are closed and deactivated. The Applicability is changed to be Modes 1, 2, 3, and 4, with no exceptions.</p> <p>When the unit is in Mode 1, 2, 3, or 4, LCO 3.7.3 currently does not apply to the valves whose flow path is isolated by a closed and deactivated valve. Thus, when a MFCV is inoperable in Mode 1, 2, 3, or 4, once the affected flow path is isolated using a closed and deactivated MFCV, as required by Required Action A.1 or B.1, LCO 3.7.3 would not apply and the periodic verification of Required Actions A.2 and B.2 would not be required. Similar to the Applicability of current TS 3.6.3, the current TS 3.7.3 Applicability is changed to not provide an exception once the affected flow path is isolated. The MFCVs will remain required to be Operable in Modes 1, 2, 3, and 4, even when the affected flow path is isolated. This change will ensure that the periodic verification of Required Actions A.2 and B.2 (changed to only be Required Action A.2 as described in another change) is performed as long as a valve in the affected flow path remains inoperable. This change is acceptable since it ensures the flow path is periodically verified to be in the post accident state (i.e., isolated) anytime when in Modes 1, 2, 3, and 4 with an associated isolation valve inoperable.</p> <p>This change is more restrictive because the scope of Required Actions A.2 and B.2 is increased as a result of the revised Applicability.</p>	M-4	TS 3.7.3 • Applicability
	<p>4. Current TS 3.7.7, "Startup Feedwater Isolation and Control Valves," as it relates to the startup feedwater control valves, is revised as follows:</p> <p>TS 3.7.7 current Applicability is Modes 1, 2, 3, and 4 except when the startup feedwater flow paths are isolated. The Applicability is changed to be Modes 1, 2, 3, and 4, with no exceptions.</p> <p>When the unit is in Mode 1, 2, 3, or 4, LCO 3.7.7 currently does not apply to the valves whose flow path is isolated. Thus, when a startup feedwater control valve is inoperable in Mode 1, 2, 3, or 4, once the affected flow path is isolated, as required by Required Action A.1 or B.1, LCO 3.7.7 would not apply and the periodic verification of Required Action A.2 would not be required. Similar to the Applicability of current TS 3.6.3, the current TS 3.7.7 Applicability is changed to not provide an exception once the affected flow path is isolated. The startup feedwater control valves will remain required to be Operable in Modes 1, 2, 3, and 4, even when the affected flow path is isolated. This change will ensure that the periodic verification of Required Action A.2 is performed as long as a valve in the affected flow path remains inoperable.</p> <p>This change is more restrictive because the scope of Required Actions A.2 is increased as a result of the revised Applicability.</p>	M-4	TS 3.7.7 • Applicability

Table M
More Restrictive Changes

DOC No.	TS Section 3.7 - Plant Systems Description of Change (change numbers added for reference)	Change Type	Affected TS Section and Requirements
M15 (cont'd)	<p>5. In TS 3.7.7, "Startup Feedwater Isolation and Control Valves," new Required Action C.3 is added stating: "Be in MODE 5" in 36 hours.</p> <p>Due to the Applicability change, new Required Action C.3 is added to be in Mode 5. This ensures that when conditions warrant, the Applicability of the LCO is exited.</p> <p>This change is more restrictive because the Unit is placed in a lower Mode.</p>	M-2	<p>ITS 3.7.7</p> <ul style="list-style-type: none"> • Required Action C.3
M04	<p>1. Current TS 3.7.10, "Steam Generator (SG) Isolation Valves," Action A as it relates to the SG PORVs is revised to add new Required Action A.2 to "verify the affected flow path is isolated" once per 31 days.</p> <p>TS 3.7.10 Action A provides the requirements when one or more PORV flow paths have one isolation valve inoperable. Current Required Action A.1 requires isolation of the flow path by use of at least one closed and deactivated automatic valve within 72 hours. Operation with an inoperable isolation valve can then continue indefinitely with no further requirements. The new Required Action A.2 ensures that the flow path that was isolated to comply with Required Action A.1 is periodically verified to remain isolated. This proposed Required Action ensures the closure required of Required Action A.1 continues to be met when a PORV is inoperable, consistent with other similar applications. This new Required Action is also consistent with the similar Required Action for an isolated blowdown flow path (current Required Action B.2). The new periodic Completion Time is consistent with the current time for inoperable containment isolation valves in TS 3.6.3. Refer to DOC M11 which moves this action from TS 3.6.3 as it relates to the PORV block valve periodic verification.</p> <p>This change is designated as more restrictive since the current TS 3.7.10 Actions do not include a periodic verification when a PORV is inoperable</p>	M-4	<p>CTS 3.7.10</p> <ul style="list-style-type: none"> • Action A ITS 3.7.10 • Required Action A.2
Types of More Restrictive Changes in TS Section 3.7:			
M-2	Required action specifies placing the unit in a lower operational mode.		
M-4	Increase in the scope of a required action or the addition of a required action.		
Types of Administrative Changes in TS Section 3.7:			
A-1	Editorial change to conform to phrasing convention and terminology of NUREG-1431, Rev. 4.		
A-2	Editorial change to conform to the industry improved standard TS writer's guide, TSTF-GG-05-01. See Table A-2 at End of Table A for breakdown of subtypes within Type A-2.		

Table M
More Restrictive Changes

DOC No.	TS Section 3.8 - Electrical Power Systems Description of Change	Change Type	Affected TS Section and Requirements
	None		
DOC No.	TS Section 3.9 - Refueling Operations Description of Change	Change Type	Affected TS Section and Requirements
	None		
DOC No.	TS Section 4.0 - Design Features Description of Change	Change Type	Affected TS Section and Requirements
	None		
DOC No.	TS Section 5.0 - Administrative Controls Description of Change	Change Type	Affected TS Section and Requirements
M01 (cont'd)	5. As a result of the deletion of the definition of Reactor Trip Channel Operational Test (RTCOT) in TS 1.1, the following requirement in TS Section 5.0 is revised: TS 5.5.14, "Setpoint Program," current paragraph c, reference to "REACTOR TRIP CHANNEL OPERATIONAL TEST (RTCOT)," is deleted. This portion of proposed changes under DOC M01 is an administrative change.	A-1	TS 5.5.14
Types of More Restrictive Changes in TS Section 5.0: None			
Types of Administrative Changes in TS Section 5.0: A-1 Editorial change to conform to phrasing convention and terminology of NUREG-1431, Rev. 4.			