Table L
Less 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
L01	1. The changes to the current TS (CTS) under DOC L01 move the requirement for the ACTUATION DEVICE TEST for the actuated device (e.g., pump, valve, pressurizer heater circuit breaker) from CTS 3.3.2 (SRs 3.3.2.7, 3.3.2.8, and 3.3.2.9) to new or existing actuated device SRs in the Specifications for systems containing the actuated devices, except for actuated devices with no LCO specified for the associated system. For these actuated devices, the SR to test the actuation device is specified in improved TS (ITS) 3.3.15 and ITS 3.3.16. In the event an actuated device's ACTUATION DEVICE TEST is not met, the actuated device is considered inoperable. Since the applicable improved TS (ITS) ACTIONS in the associated system's Specification or in ITS 3.3.15 or ITS 3.3.16, are less restrictive than the ACTIONS provided by CTS 3.3.2 for Function 26.a, "ESF Actuation Subsystem," and Function 27.a, "Pressurizer Heater Trip on Core Makeup Tank (CMT) Actuation," all changes under DOC L01 are considered to be less restrictive. For example, as an SR associated with current TS 3.3.2, Table 3.3.2-1, Function 26 for MODES 1, 2, 3, and 4, would impose a 6 hour restoration (ACTION D) prior to a required plant shutdown (ACTION O). Each of the individual equipment Specifications with SRs added to address actuation device testing (listed in this table below) has a 72-hour or 7-day restoration allowance. This is followed in some cases by additional flexibility to isolate associated flow paths in lieu of plant shutdown. These less restrictive actions, which are currently specified in current TS, are considered appropriate for the inoperable devices. The current TS (CTS) 1.1 definition for ACTUATION DEVICE TEST is deleted.	L-7	CTS 1.1, "Definitions" • ACTUATION DEVICE TEST
	2. Reference to "overlap with the ACTUATION DEVICE TEST" that is cited in the CTS definition of ACTUATION LOGIC TEST is replaced with "overlap with the actuated device." The actuated device will be tested under new surveillance requirements that are being added by this license amendment request (LAR) to each TS subsection (Specification) that specifies an LCO for the affected structure, system, or component (SSC) (i.e., actuated device). (See TS Sections 3.1, 3.3, 3.4, 3.5, 3.6 and 3.7 for other L01 changes)	L-7	CTS / ITS 1.1 • ACTUATION LOGIC TEST
L02	1. Current TS 5.6, "Reporting Requirements," is revised to delete TS 5.6.1, "Occupational Radiation Exposure Report," and TS 5.6.4, "Monthly Operating Reports." These changes result in the renumbering of TS 5.6 sections, but do not revise technical or administrative requirements. The following definitions are affected by the renumbering of Section 5.6 Specifications: In the definition of CORE OPERATING LIMITS REPORT (COLR), the reference to current TS 5.6.5 is changed to "Specification 5.6.3"; and in the definition of PRESSURE and TEMPERATURE LIMITS REPORT (PTLR), the reference to current TS 5.6.6 is changed to "Specification 5.6.4." The changes are consistent with TSTF-369-A, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," Revision 1. Removal of the two reporting requirements is considered to be less restrictive; but changes related to renumbering of requirements are administrative.	L-8	CTS / ITS 1.1 • COLR • PTLR

Table L
Less 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
L03	1. CTS are revised to eliminate the use of the defined term “CORE ALTERATION” and incorporate changes reflected in Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-471-A, ”Eliminate use of term CORE ALTERATIONS in ACTIONS and Notes,” Revision 1. The proposed change affects the following Specification: Current TS 1.1, "Definitions" The definition of “CORE ALTERATION” is deleted. (See TS Sections 3.8 and 3.9 for other L03 changes.)	L-10	CTS 1.1 • CORE ALTERATION
L04	1. Current TS 1.3, “Completion Times,” Example 1.3-3, is revised to eliminate the second Completion Times of Required Actions A.1 and B.1, and to replace the discussion regarding second Completion Times with a new discussion about avoiding continual operation of the unit with an LCO not met (through alternating entry into and exit from independent Conditions in the LCO’s ACTIONS). This change incorporates changes reflected in TSTF-439-A, "Eliminate Second Completion Times Limiting Time From Discovery of Failure To Meet an LCO," Revision 2. As a result, the second Completion Time specified for various Required Actions in TS Section 3.8 is also deleted. (See TS Section 3.8 for other L04 changes)	L-3	CTS / ITS 1.3 • Example 1.3-3

Types of Less Restrictive Changes in TS Section 1.0:

L-3 Relaxation of Completion Time

L-7 Replacement of SR with Equivalent Requirement

L-8 Deletion of Reporting Requirements

L-10 Deletion of Definition of CORE ALTERATIONS

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

Table L
Less Restrictive Changes

DOC No.	TS Section 3.0 - LCO and SR Applicability **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L05	1. CTS LCO 3.0.8 is deleted. LCO 3.0.8 applies in MODES 5 and 6 when the associated Actions are not met or an associated Action is not provided. In some case, LCO 3.0.8 is explicitly excluded from being applied by way of a Note. In conjunction with the change to eliminate LCO 3.0.8, these Notes are no longer necessary and are administratively eliminated. When applicable, LCO 3.0.8 requires: "… action shall be initiated within 1 hour to: a. Restore inoperable equipment and b. Monitor Safety System Shutdown Monitoring Trees parameters" The actions provided in individual TS Actions fall into one of the following types of actions: (1) Restore compliance with the LCO; (2) Exit the Applicability; or (3) Impose compensatory measures. LCO 3.0.8.a imposes a "restore" action, but without a stated completion time. This action duplicates the "restore" action already imposed in various Specifications that are applicable in MODES 5 and 6, and for these Specifications provides no additional safety benefit. The LCO 3.0.8.b action to "Monitor Safety System Shutdown Monitoring Trees parameters," is adequately addressed by the TS 5.4.1.b requirement to implement the emergency operating procedures that implement NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33. The Shutdown Emergency Response Guidelines, outlined in Final Safety Analysis Report (FSAR) Section 19E.3.3, are captured within the development of these emergency operating procedures. The monitoring of shutdown safety status trees that provides a systematic method of determining the safety status of the plant is an integral part of the operating procedures during shutdown operations. As such, the LCO 3.0.8.b monitoring requirement is redundant to monitoring required to comply with TS 5.4.1.b. Therefore, removing LCO 3.0.8 (and references to it) will not adversely impact public health and safety. Additionally, since [intentional] entry into LCO 3.0.8 reflects a condition prohibited by TS (similar to entry into LCO 3.0.3 with the unit operating in MODE 1, 2, 3, or 4), the intent of reporting required by 10 CFR 50.73(a)(2)(i)(B) would result in NRC notification by way of a Licensee Event Report. (See TS Sections 3.3, 3.7 and 3.9 for other L05 changes)	L-9	CTS 3.0 • LCO 3.0.8

Types of Less Restrictive Changes in TS Section 3.0:

L-9 Deletion of LCO 3.0.8

Table L
Less Restrictive Changes

DOC No.	TS Section 3.1 - Reactivity Control Systems **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L01 (cont'd)	CTS 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," SR 3.3.2.7 ("Perform ACTUATION DEVICE TEST") and SR 3.3.2.8 ("Perform ACTUATION DEVICE TEST for squib valves") are deleted from CTS 3.3.2 and Table 3.3.2-1, Function 26.a, "ESF Actuation Subsystem." The equivalent requirement (using phrasing generally consistent with NUREG-1431) is included in individual Specifications for the actuated devices with the same 24 month Frequency as the deleted SRs. The following SR is being added: 3. New SR 3.1.9.3 is added to TS 3.1.9, "Chemical and Volume Control System (CVS) Demineralized Water Isolation Valves and Makeup Line Isolation Valves," stating: "Verify each CVS demineralized water isolation valve actuates to the isolation position on an actual or simulated actuation signal." (See TS Sections 1.0, 3.3, 3.4, 3.5, 3.6 and 3.7 for other L01 changes)	L-7	CTS 3.3.2 • Fn 26.a • SR 3.3.2.7 • SR 3.3.2.8 (MODES 1, 2, 3, 4 only) --- ITS 3.1.9 • SR 3.1.9.3
L10	1. CTS 3.1.8 "PHYSICS TESTS Exceptions – MODE 2," LCO 3.1.8 is revised to delete the listing of Function 16.b, "P-10, Power Range Neutron Flux," of current LCO 3.3.1, and provide the full title for ITS 3.3.1 in the reference to LCO 3.3.1; i.e., "Reactor Trip System (RTS) Instrumentation." (See discussion of DOC L10 Item 2 in TS Section 3.3 for the deletion of Function 16 from CTS 3.3.1.)	L-1	TS 3.1.8 • LCO

Types of Less Restrictive Changes in TS Section 3.1:

L-1 Relaxation of LCO Requirement

L-7 Replacement of SR with Equivalent Requirement

Table L
Less Restrictive Changes

DOC No.	TS Section 3.2 - Power Distribution Limits **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L06	1. Current TS 3.2.5, "On-Line Power Distribution Monitoring System (OPDMS) - Monitored Parameters," SR 3.2.5.1 Frequency states: "24 hours with OPDMS alarms OPERABLE OR 12 hours with OPDMS alarms inoperable." This is revised to require only “24 hours” as the Frequency. The On-line Power Distribution Monitoring System (OPDMS) for the AP1000 is an advanced core monitoring and support package. The OPDMS has the ability to continuously monitor core power distribution parameters. Two levels of alarms on power distribution parameters are provided to the operator. One serves as a warning before the three parameters excluding SDM exceed their values used as a base condition for the safety analysis. The other alarm indicates when the parameters have reached their limits. Current SR 3.2.5.1 requires the operator to verify that the power distribution parameters are within their limits. This confirmation is a verification in addition to the automated checking performed by the OPDMS. A 24 hour Surveillance interval provides assurance that the system is functioning properly and that the core limits are met. In addition to the SR 3.2.5.1 normal 24 hour Frequency, the TS also contains actions (in the form of an increased surveillance frequency) to be performed in the event of inoperable alarms. These actions are removed from the TS since the alarms themselves do not directly relate to the LCO limits or the monitoring capability of the OPDMS. This change is designated as a less restrictive change because a specific surveillance Frequency is being deleted. Further, the proposed change is consistent with TSTF-110-A, "Delete SR frequencies based on inoperable alarms," Revision 2.	L-6	TS 3.2.5 • SR 3.2.5.1

Types of Less Restrictive Changes in TS Section 3.2:

L-6 Relaxation of SR Frequency

Table L
Less Restrictive Changes

DOC No.	TS Section 3.3, Instrumentation **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L07	1. Certain CTS ACTIONS requiring the reactor trip breakers (RTBs) to be opened are revised into two Required Actions, as shown in the following example: E.1 Initiate action to fully insert all rods. | 1 hour <u>AND</u> E.2 Place the Plant Control System in a condition incapable of rod withdrawal. | 1 hour The specific CTS Required Actions being revised (and affected RTS functions) are: Current TS 3.3.1, "Reactor Trip System (RTS) Instrumentation," • Required Action B.2.2, "Open reactor trip breakers (RTBs). | 55 hours" CTS 3.3.1 Fns 1, 15.a, 20.a, and 21.a ..... ITS 3.3.5 Fns 1, 2, 3, and 4 • Required Action C.2, "Open RTBs. | 49 hours" CTS 3.3.1 Fn 1 ..... ITS 3.3.5 Fn 1 • Required Action N.2.2, "Open RTBs. | 14 hours" CTS 3.3.1 Fns 17 and 18 ..... ITS 3.3.7 Fns a and b • Required Action O.2.2, "Open RTBs. | 7 hours" CTS 3.3.1 Fns 17 and 18 ..... ITS 3.3.7 Fns a and b • Required Action P.2, "Open RTBs. | 49 hours" CTS 3.3.1 Fns 19, 20.b, and 21.b .....ITS LCO 3.3.6, and ITS 3.3.4 Fns 2 and 3 • Required Action Q.2, "Open RTBs. | 49 hours" CTS 3.3.1 Fn 5 .....ITS LCO 3.3.2 (See TS Section 3.4 for other L07 changes) (See Table A for TS Section 3.3, DOC A024, Change No. 3, for an RTS Function index between CTS 3.3.1 and ITS 3.3.1 through ITS 3.3.7) Each of the Required Actions to open the RTBs is intended to assure that rods cannot be withdrawn thereby eliminating the possibility for control rod related positive reactivity additions and associated heat input into the reactor coolant. Additionally, opening the RTBs would result in all rods being inserted. Therefore, replacing Required Actions to open RTBs with the two actions to “initiate action to fully insert all rods" and “place the Plant Control System in a condition incapable of rod withdrawal," maintains the intent of the existing requirement. This change replaces the specific method of precluding rod withdrawal and ensuring all rods are inserted while maintaining the requirement for establishing the plant conditions equivalent to opening RTBs. Also, this change (allowing for alternate options to preclude rod withdrawal and establish all rods inserted) is (continued)	L-4	CTS 3.3.1 • Fns 1, 5, 15.a, 17, 18, 19, 20.a, 20.b, 21.a, and 21.b • Required Action B.2.2 • Required Action C.2 • Required Action N.2.2 • Required Action O.2.2 • Required Action P.2 • Required Action Q.2 --- ITS 3.3.2 LCO 3.3.2 • Required Action E.1 • Required Action E.2 ITS 3.3.4 Fns 2, 3 • Required Action D.1 • Required Action D.2 ITS 3.3.5 Fns 1, 2, 3, 4 • Required Action C.1 • Required Action C.2 ITS 3.3.6 LCO 3.3.6 • Required Action D.1 • Required Action D.2 ITS 3.3.7 Fns a, b • Required Action D.1 • Required Action D.2 (continued)

DOC No.	TS Section 3.3, Instrumentation **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L07 (cont'd)	1. (continued) necessary to eliminate the potential for undesirable secondary effects of opening the reactor trip breakers. Opening the RTBs trips the plant P-4 interlock which, in the event of low Reactor Coolant System (RCS) temperature, can result in isolation of main feedwater to the steam generators. This change is designated as a less restrictive because one specific method for meeting the intended TS requirements is being removed from the TS, allowing alternate methods to establish the equivalent conditions.	L-4	CTS 3.3.1 Fns 1, 5, 15.a, 17, 18, 19, 20.a, 20.b, 21.a, and 21.b --- ITS 3.3.2 LCO 3.3.2 ITS 3.3.4 Fns 2, 3 ITS 3.3.5 Fns 1, 2, 3, 4 ITS 3.3.6 LCO 3.3.6 ITS 3.3.7 Fns a, b
	2. TS Applicabilities associated with RTB position are being revised. Applicabilities of "With RTBs closed and Plant Control System capable of rod withdrawal" or "Whenever the reactor trip breakers are closed" are revised to state "With Plant Control System capable of rod withdrawal or one or more rods not fully inserted." Conversely, Applicabilities that include "RTBs open" are revised to address the condition of Plant Control System incapable of rod withdrawal and all rods fully inserted. The specific Applicabilities revised are: Current TS 3.3.1 • Table 3.3.1-1, Footnote (a), "With Reactor Trip Breakers (RTBs) closed and Plant Control System capable of rod withdrawal," modifying the Applicability of MODE 3, 4, and 5 for Functions 1, 5, 17, 18, 19, 20a, 20b, 21a, and 21b (See TS Section 3.4 for other L07 changes) To ensure that when the revised Required Actions are taken the unit is removed from the Mode of Applicability, conforming revision to the Applicabilities are made. The equivalent condition to the current Applicabilities that include “RTBs closed” is the condition of Plant Control System capable of rod withdrawal. However, since rods could have been withdrawn prior to making the Plant Control System incapable of rod withdrawal, an additional condition is included of “or one or more rods not fully inserted.” This also aligns with the Required Actions that require both “fully insert all rods" and “place the Plant Control System in a condition incapable of rod withdrawal." The equivalent condition to the current Applicabilities that include “RTBs open” is the condition of Plant Control System capable of rod withdrawal and all rods fully inserted. This portion of the proposed changes of DOC L07 is less restrictive because exiting the Applicability does not necessarily require opening the RTBs.	L-2	CTS 3.3.1 • Applicability --- ITS 3.3.2 • Applicability ITS 3.3.4 • Applicability ITS 3.3.5 • Applicability ITS 3.3.6 • Applicability ITS 3.3.7 • Applicability

Table L
Less Restrictive Changes

DOC No.	TS Section 3.3, Instrumentation **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L08	1. CTS 3.3.1, "Reactor Trip System (RTS) Instrumentation," ACTION D, for the condition of "One or two Power Range Neutron Flux – High [Setpoint] channels inoperable" provides three sets of actions connected by the "OR" logical connector (i.e., set D.1 OR set D.2 OR set D.3) for Table 3.3.1-1 Fn 2.a. Upon entry of the unit into Condition D, the unit operator would have three options for satisfying ACTION D. ACTION D is revised by deleting Required Actions D.1.1 of set D.1, and Required Actions D.2.1 and D.2.2 of set D.2; this change is deemed a less restrictive change since Required Actions are being deleted: • Required Action D.1.1 (Reduce THERMAL POWER to ≤ 75% RTP within 12 hours AND). Deleting D.1.1 maintains the option of set D.1 as Required Action D.1.2 (Place one inoperable channel in bypass or trip within 6 hours AND) and Required Action D.1.3 (With two inoperable channels, place one channel in bypass and one channel in trip within 6 hours). • Required Action D.2.1 (OR Place inoperable channel(s) in bypass within 6 hours AND) and Required Action D.2.2 (NOTE - Only required to be performed when OPDMS is inoperable and the Power Range Neutron Flux input to QPTR is inoperable.)(Perform SR 3.2.4.2 once per 12 hours). Deleting D.2.1 and D.2.2 eliminates the option of set D.2. This change maintains the option of set D.3 to exit Fn 2.a's Applicability: Required Action D.3 (OR Be in MODE 3 within 6 hours). Required Actions D.1.1 and D.2.2 are related to TS 3.2.4, "Quadrant Power Tilt Ratio (QPTR)," radial power distribution monitoring. The SRs of TS 3.2.4 are provided with Notes defining the appropriate tests to conduct when Power Range Neutron Flux channels may not be available for monitoring. These SRs provide the appropriate restrictions in the event of inoperable Power Range Neutron Flux channels without reliance on redundant restrictions in the ACTIONS of CTS 3.3.1. As stated in the CTS 3.3.1 bases for Required Action D.1.1, the requirement to reduce power to ≤ 75% RTP is an alternate to monitoring QPTR every 12 hours in accordance with SR 3.2.4.2 (Verify QPTR is within limit using a minimum of 4 symmetric pairs of fixed incore detectors once per 12 hours). The Note of Required Action D.2.2 states, and the Applicability of CTS 3.2.4 indicates that monitoring QPTR every 12 hours would only be required in the event the On-line Power Distribution Monitoring System (OPDMS) is **not monitoring parameters** ~~inoperable~~ (See DOC A011). Furthermore, Power Range Neutron Flux channels could be inoperable for the RTS function yet continue to provide usable input for QPTR monitoring, in which case neither D.1.1's power reduction nor D.2.2's performance of SR 3.2.4.2 would be necessary to provide adequate protection and monitoring. (continued)	L-1 L-4 L-7	CTS 3.3.1 • Function (Fn) 2.a, "Power Range Neutron Flux High Setpoint" • Action A • Required Action D.1.1 • Required Action D.2.1 • Required Action D.2.2 --- ITS 3.3.1 • Fn 1.a, "Power Range Neutron Flux High Setpoint" • Conditions A, B, C, D • Required Action A.1 • Required Actions B.1 and B.2 • Required Action C.1 • Required Action D.1 (continued)

DOC No.	TS Section 3.3, Instrumentation **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L08 (cont'd)	1. (continued) Finally, were two Power Range Neutron Flux High Setpoint channels inoperable, current Required Action D.2.1 would require both inoperable channels to be placed in bypass. The AP1000 design does not permit bypassing more than one channel of an instrument function at a time. As such, this Required Action is inappropriate and could not be completed. As such, this change to remove Required Actions D.1.1, D.2.1, and D.2.2 is acceptable because in the event the Power Range Neutron Flux High Setpoint RTS function is degraded (one or more channels inoperable), ● These action requirements are overly restrictive and inappropriate; ● TS 3.2.4 includes compensatory measures that already adequately address the potential impact on core radial power monitoring; and ● The remaining Required Actions (D.1.2, D.1.3, and D.3) provide appropriate compensatory and mitigative actions that are retained in ITS 3.3.1 ACTIONS. Therefore, there is no significant adverse impact on the public health and safety. With this change, revised current ACTION D matches current ACTION E, which allows applying DOC A024's administrative changes to revised ACTION D for the Power Range Neutron Flux High Setpoint RTS Function, as well as to ACTION E. Note that editorial renumbering and revised presentation of CTS 3.3.1 ACTION D (as revised by DOC L08) in corresponding ITS 3.3.1 ACTIONS A, B, C, and D are described in Change No. 3.1 of DOC A024 in Table A.	L-1 L-4 L-7	CTS 3.3.1 • Function (Fn) 2.a, "Power Range Neutron Flux High Setpoint" • Action A • Required Action D.1.1 • Required Action D.2.1 • Required Action D.2.2 --- ITS 3.3.1 • Fn 1.a, "Power Range Neutron Flux High Setpoint" • Conditions A, B, C, D • Required Action A.1 • Required Actions B.1 and B.2 • Required Action C.1 • Required Action D.1

DOC No.	TS Section 3.3, Instrumentation **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L10 (cont'd)	2. This change removes the explicit OPERABILITY requirements for RTS and ESFAS interlocks in – CTS 3.3.1 Fn 16, "RTS Interlocks," and deletes associated ACTION M; and – CTS 3.3.2, Fn 18, "ESFAS Interlocks," with the exception of Fn 18.b, "Reactor Trip, P-4," and deletes associated ACTION J. (Refer to new TS 3.3.12, " ESFAS Reactor Trip Initiation," for requirements related to retaining the P-4 "interlock" as an ESFAS actuation Function.) See Table A, DOC A024 Changes 3 and 3.21; DOC A025 Change 2; and DOC A028 Change **9** for additional details about the RTS and ESFAS functions supported by these interlock functions. Reactor Trip System (RTS) interlocks are provided to ensure reactor trip functions are in the correct configuration for the current plant status. They back up operator actions to ensure protection system Functions are not blocked during plant conditions under which the safety analysis assumes the Functions are OPERABLE. Additionally, several interlocks are included as part of the ESFAS. These interlocks permit the operator to block some signals, automatically enable other signals, prevent some actions from occurring, and cause other actions to occur. The interlock Functions backup manual actions to ensure bypassable Functions are in operation under the conditions assumed in the safety analysis. The interlocks, as separate RTS and ESFAS actuation Functions (except for Fn 18.b, Reactor Trip, P-4), are removed from the TS and the associated ACTIONS are deleted. Interlock OPERABILITY is adequately addressed by each related (supported) actuation Function's requirement to be OPERABLE and the requirement for actuation logic operability. For these related RTS and ESFAS actuation Functions to be OPERABLE, the associated interlocks must be in the required state as a support feature for OPERABILITY. These interlocks do not directly trip the reactor or initiate an ESF function, and as such are removed from the actuation Function instrumentation listing in TS. The role of the interlocks and the OPERABILITY relationship to supported TS actuation Functions are retained in the TS Bases, and will continue to be described in FSAR Chapter 7, Instrumentation and Controls. Furthermore, each supported actuation Function's specified Applicability is tied to operation above or below (as applicable) the various associated interlock settings. As such, the TS required actuation Functions transition into various specified conditions of Applicability when the interlock function would be backing up the operator actions to ensure the functions are not blocked when they are required to be OPERABLE. LCO 3.0.4 requires the operators to ensure actuation Function OPERABILITY prior to entering the Function's specified Applicability. These TS requirements provide the necessary OPERABILITY requirements related to the removed interlock Functions. Certain CTS Required Actions for inoperable interlock functions (CTS 3.3.1 Required Action M.1 for RTS interlocks and CTS 3.3.2 Required Action J.1 for ESFAS interlocks), provide the following (continued)	L-1 L-4 L-7	CTS 3.3.1 RTS Interlock Fns: • 16.a **P-6**, IRNF • 16.b **P-10**, PRNF • 16.c **P-11**, Pressurizer Pressure ○ ACTION M CTS 3.3.2 ESFAS Interlock Fns: • 18.a **P-3**, RTB Open • 18.b **P-4**, RT Initiation • 18.c **P-6**, IRNF • 18.d **P-11**, Pressurizer Pressure • 18.e **P-12**, Pressurizer Level • 18.f **P-19**, RCS Pressure ○ ACTION M --- Interlocks are required as part of LCO for listed functions: ITS 3.3.1 **P-10:** Fns 1.b, 5.a, 6, 7, 9 **P-11:** Fn 11 ITS LCO 3.3.2 **P-6**; **P-10** ITS LCO 3.3.3 **P-10** ITS 3.3.8 **P-3:** Fns 1, 5, 11, 24 **P-4:** Fns 12,13, 22 **P-6:** Fn 17 **P-11:** Fns 2, 4, 5, 11, 13, 24, 25 **P-12:** Fns 3, 7 **P-19:** Fns 9, 10 ITS 3.3.10 **P-12:** Fns 1, 2 ITS LCO 3.3.12 **P-4** (CTS 3.3.2 Fns 5.c, 15.b) (continued)

Table L
Less Restrictive Changes

DOC No.	TS Section 3.3, Instrumentation **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L10 (cont'd)	2. (continued) optional remedial action allowance: "Verify the interlocks are in the required state for the existing plant conditions" within "1 hour." This verification is essentially the OPERABILITY evaluation for the supported functions. If interlocks are not in the required state for the existing plant conditions, then the affected supported Functions would be inoperable and their specified ACTIONS would apply. The current 1 hour completion time provides opportunity for the operator to manually place the interlock in the state that accomplishes the interlock function necessary to support RTS and ESFAS actuation Function OPERABILITY. Once this required action is completed, unit operation may continue indefinitely. As such, this provision provides an acceptable alternative to reliance on the automatic interlock function – allowing the operator to manually ensure the interlock is in its required state. With this required action deleted, the determination of supported function OPERABILITY is immediate and the operator must immediately enter the ACTIONS for all of the supported Functions made inoperable by the interlock not being in its required state. (Note that removing the 1-hour allowance is more restrictive, while the removal of the explicit OPERABILITY requirements for the interlocks is overall deemed to be less restrictive.) Functions with interlocks that are implicitly required to support the Function's OPERABILITY, are also addressed by the CHANNEL CALIBRATION and CHANNEL OPERATIONAL TEST (COT) surveillance requirements. Each CHANNEL CALIBRATION and COT discussion in the TS Section 3.3 Bases will include the following paragraph in support of this change "Interlocks implicitly required to support the Function's OPERABILITY, are also addressed by this [CHANNEL CALIBRATION] [COT]. This portion of the [CHANNEL CALIBRATION] [COT] ensures the associated Function is not bypassed when required to be enabled. This can be accomplished by ensuring the interlocks are calibrated properly in accordance with the SP. If the interlock is not automatically functioning as designed, the condition is entered into the Corrective Action Program and appropriate OPERABILITY evaluations [are] performed for the affected Function. The affected Function's OPERABILITY {requirement} can be met if the interlock is manually enforced to properly enable the affected Functions. When an interlock is not supporting the associated Function's OPERABILITY at the existing plant conditions, the affected Function's channels must be declared inoperable and appropriate ACTIONS taken." (Note that in the VCSNS TS, "SP" stands for "Setpoint Program"; Specification 5.5.14. Also the bracketed word "{requirement}" clarifies the NRC staff's understanding of the intended meaning of the sentence in the above paragraph, but this word is not included in the application) (continued)	L-1 L-4 L-7	CTS 3.3.1 RTS Interlock Fns: • 16.a **P-6**, IRNF • 16.b **P-10**, PRNF • 16.c **P-11**, Pressurizer Pressure ○ ACTION M CTS 3.3.2 ESFAS Interlock Fns: • 18.a **P-3**, RTB Open • 18.b **P-4**, RT Initiation • 18.c **P-6**, IRNF • 18.d **P-11**, Pressurizer Pressure • 18.e **P-12**, Pressurizer Level • 18.f **P-19**, RCS Pressure ○ ACTION J --- Interlocks are required as part of LCO for listed functions: ITS 3.3.1 **P-10:** Fns 1.b, 5.a, 6, 7, 9 **P-11:** Fn 11 ITS LCO 3.3.2 **P-6**; **P-10** ITS LCO 3.3.3 **P-10** ITS 3.3.8 **P-3:** Fns 1, 5, 11, 24 **P-4:** Fns 12,13, 22 **P-6:** Fn 17 **P-11:** Fns 2, 4, 5, 11, 13, 24, 25 **P-12:** Fns 3, 7 **P-19:** Fns 9, 10 ITS 3.3.10 **P-12:** Fns 1, 2 ITS LCO 3.3.12 **P-4** (CTS 3.3.2 Fns 5.c, 15.b) (continued)

Table L
Less Restrictive Changes

DOC No.	TS Section 3.3, Instrumentation **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L10 (cont'd)	2. (continued) This change deletes CTS 3.3.1 Required Actions M.2.1, M.2.2, and M.3 for RTS interlocks and CTS 3.3.2 Required Actions J.2.1 and J.2.2 for ESFAS interlocks. The completion times of these related action requirements, which specify tripping or bypassing inoperable channels, include the completion time allowance of 1-hour, described above. Since, the removal of CTS 3.3.1 ACTION M and CTS 3.3.2 ACTION J also removes this completion time allowance from the TS action requirements that would apply were an actuation Function be made inoperable by its supporting interlock, removal of these action requirements is also more restrictive. As stated above, removing explicit OPERABILITY requirements for the interlocks is deemed less restrictive overall. While the effect of this change results in certain more restrictive ACTIONS, this change is deemed a less restrictive change since explicit OPERABILITY, action, and surveillance requirements related to the RTS and ESFAS interlocks are being removed from TS, which results in implicit requirements associated with OPERABILITY, COTs, and CHANNEL CALIBRATIONS. --- -	L-1 L-4 L-7	CTS 3.3.1 RTS Interlock Fns: • 16.a **P-6**, IRNF • 16.b **P-10**, PRNF • 16.c **P-11**, Pressurizer Pressure ○ ACTION M CTS 3.3.2 ESFAS Interlock Fns: • 18.a **P-3**, RTB Open • 18.b **P-4**, RT Initiation • 18.c **P-6**, IRNF • 18.d **P-11**, Pressurizer Pressure • 18.e **P-12**, Pressurizer Level • 18.f **P-19**, RCS Pressure ○ ACTION J --- Interlocks are required as part of LCO for listed functions: ITS 3.3.1 **P-10:** Fns 1.b, 5.a, 6, 7, 9 **P-11:** Fn 11 ITS LCO 3.3.2 **P-6**; **P-10** ITS LCO 3.3.3 **P-10** ITS 3.3.8 **P-3:** Fns 1, 5, 11, 24 **P-4:** Fns 12,13, 22 **P-6:** Fn 17 **P-11:** Fns 2, 4, 5, 11, 13, 24, 25 **P-12:** Fns 3, 6, 7 **P-19:** Fns 9, 10 ITS 3.3.10 **P-12:** Fns 1, 2 ITS LCO 3.3.12 **P-4** (CTS 3.3.2 Fns 5.c, 15.b)

Table L
Less Restrictive Changes

DOC No.	TS Section 3.3, Instrumentation **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L11	1. Current TS 3.3.1, "Reactor Trip System (RTS) Instrumentation," is revised to delete: • Current Table 3.3.1-1, Function 5, Source Range Neutron Flux High Setpoint, Third row for that Function including Applicability set "3[(e)],4[(e)],5[(e)]" and associated references to Required Channels, Conditions, and SRs; • Current Table 3.3.1-1, Footnote (e); and • Current Action R. The Source Range Neutron Flux Function in Modes 3, 4, and 5 with RTBs open, is not related to the Reactor Trip System, but involves indication only as stated in the current Applicability Footnote (e), and only requires one channel to be providing indication. The associated Bases also state that in Mode 3, 4, or 5 with the RTBs open, the LCO does not require the Source Range Neutron Flux channels for reactor trip functions to be Operable. As such, this requirement is inappropriately placed in the Specification requiring Reactor Trip System operability. Source Range Neutron Flux channels are also required to be Operable by current TS 3.3.2, Engineered Safeguards Actuation System (ESFAS) Instrumentation, Table 3.3.2-1, Function 15a, Boron Dilution Block - Source Range Neutron Flux Doubling. This Function remains Applicable, requiring 4 channels, during the specified condition being deleted in TS 3.3.1. Furthermore, the SRs for this Function also encompass the CHANNEL CHECK and CHANNEL CALIBRATION surveillances being deleted from current TS 3.3.1 for Source Range Neutron Flux. Current TS 3.3.1, ACTION R applies solely for inoperability of the one required Source Range Neutron Flux indication channel (i.e., all four Source Range Neutron Monitoring channels inoperable). In the unlikely event that all four channels were inoperable, the requirements associated with the Boron Dilution Block - Source Range Neutron Flux Doubling channels, are appropriate to provide the necessary protection. Changes to these Actions are addressed in changes to the current TS 3.3.2, Table 3.3.2-1, Function 15a, Boron Dilution Block – Source Range Neutron Flux Doubling function, and are reflected in the revised TS 3.3.8, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation." The revised TS 3.3.8 actions direct entering applicable actions for inoperable valves associated with boron dilution flow paths, i.e., TS 3.1.9, Chemical and Volume Control System (CVS) Demineralized Water Isolation Valves and Makeup Line Isolation Valves. TS 3.1.9, ACTION B would apply to this condition (i.e., all required valves would be considered inoperable) and requires isolation of the affected flow paths within 1 hour, consistent with current TS 3.3.1, Required Action R.2. The potential for an uncontrolled boron dilution accident is eliminated by isolating all unborated water sources as required by this action. This change eliminates current Required Action R.1 (suspend operations involving positive reactivity additions) and R.3 (perform Shutdown Margin verifications); however, with the RTBs open and potential boron dilution paths isolated the unit safety is adequately maintained without these additional required actions. (continued)	L-2 L-4 L-7	CTS 3.3.1 • LCO 3.3.1 Function 5 • ACTION R • SR 3.3.1.1, SR 3.3.1.11 CTS 3.3.2 • LCO 3.3.1 Function 15.a • ACTION T --- ITS 3.3.8 • LCO 3.3.8 Function 17 • ACTION I • SR 3.3.8.1, SR 3.3.8.3 ITS 3.1.9 • ACTION B (continued)

Table L
Less Restrictive Changes

DOC No.	TS Section 3.3, Instrumentation **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L11 (cont'd)	1. (continued) This change is consistent with changes made in TSTF-135-A, "3.3 - RPS and ESFAS Instrumentation," Revision 3, and as reflected in NUREG-1431. This change is designated as a less restrictive change because certain actions for inoperability of all four source range channels are made less restrictive.	L-2 L-4 L-7	CTS 3.3.1 • LCO 3.3.1 Function 5 • ACTION R • SR 3.3.1.1, SR 3.3.1.11 CTS 3.3.2 • LCO 3.3.1 Function 15.a • ACTION T --- ITS 3.3.8 • LCO 3.3.8 Function 17 • ACTION I • SR 3.3.8.1, SR 3.3.8.3 ITS 3.1.9 • ACTION B
L01 (cont'd)	4. Current SR 3.3.2.9 (renumbered as new SR 3.3.15.2) is revised to eliminate the use of the ACTUATION DEVICE TEST defined term. "Perform ACTUATION DEVICE TEST for pressurizer heater circuit breakers" is replaced with "Verify pressurizer heater circuit breakers trip open on an actual or simulated actuation signal;" also including a Note to the SR stating: "Only required to be met in MODE 4 above the P-19 (RCS Pressure) interlock with the RCS not being cooled by RNS."	L-7	CTS 3.3.2 • SR 3.3.2.9 --- ITS 3.3.15 • SR 3.3.15.2 and surveillance column Note
	5. Current TS 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," SR 3.3.2.7 ("Perform ACTUATION DEVICE TEST") and SR 3.3.2.8 ("Perform ACTUATION DEVICE TEST for squib valves") are deleted from current TS 3.3.2 SRs and Table 3.3.2-1, Function 26.a, ESF Actuation Subsystem. The equivalent requirement (using phrasing generally consistent with NUREG-1431) is included in individual Specifications for the actuated devices with the same 24 month Frequency as the deleted SRs. The following new SRs with a 24-month Frequency are included in the new instrument Specifications. The new Specifications (ITS 3.3.15, "ESFAS Actuation Logic –– Operating," and ITS 3.3.16, "ESFAS Actuation Logic – Shutdown") result from reformatting of current TS 3.3.2 and are addressed in DOC A028. 5.1 New SR 3.3.15.3 and new SR 3.3.16.2 are added, each requiring: "Verify reactor coolant pump breakers trip open on an actual or simulated actuation signal." SR 3.3.16.2 also includes a Note stating "Only required to be met in MODE 5."	L-7	CTS 3.3.2 • Fn 26.a • SR 3.3.2.7 • SR 3.3.2.8 (MODES 1, 2, 3, 4 only) --- ITS 3.3.15 • SR 3.3.15.2 ITS 3.3.16 • SR 3.3.16.2 and surveillance column Note

Table L
Less Restrictive Changes

DOC No.	TS Section 3.3, Instrumentation **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L01 (cont'd)	5.2. New SR 3.3.15.4 and new SR 3.3.16.3 are added, each requiring: "Verify CVS letdown isolation valves actuate to the isolation position on an actual or simulated actuation signal." SR 3.3.15.4 also includes a Note stating: "Only required to be met in MODE 4 with the RCS being cooled by the RNS or below the P-12 (Pressurizer Level) interlock." SR 3.3.16.3 also includes two Notes stating: "1. Not required to be met in MODE 5 above the P-12 (Pressurizer Level) interlock;" and "2. Not required to be met in MODE 6 above the P-12 (Pressurizer Level) interlock and water level ≥ 23 feet above the top of the reactor vessel flange."	L-7	CTS 3.3.2 • SR 3.3.2.7 ---------- ITS 3.3.15 • SR 3.3.15.4 ITS 3.3.16 • SR 3.3.16.3 and surveillance column Notes 1 and 2
	5.3. New SR 3.3.15.5 is added stating: "Verify main feedwater and startup feedwater pump breakers trip open on an actual or simulated actuation signal."	L-7	CTS 3.3.2 • SR 3.3.2.7 ---------- ITS 3.3.15 • SR 3.3.15.5
	5.4. New SR 3.3.16.4 is added stating "Verify Spent Fuel Pool Cooling System containment isolation valves actuate to the isolation position on an actual or simulated actuation signal." SR 3.3.16.4 also includes a Note stating: "Only required to be met in MODE 6." These valves actuate on the Spent Fuel Pool Level – Low signal.	L-7	CTS 3.3.2 • SR 3.3.2.7 ---------- ITS 3.3.16 • SR 3.3.16.4 and surveillance column Note
	5.5. New SR 3.3.15.6 is added stating "Verify auxiliary spray and purification line isolation valves actuate to the isolation position on an actual or simulated actuation signal." SR 3.3.15.6 also includes a Note stating: "Only required to be met in MODES 1 and 2."	L-7	CTS 3.3.2 • SR 3.3.2.7 ---------- ITS 3.3.15 • SR 3.3.15.6 and surveillance column Note
L05 (cont'd)	2. Current TS LCO 3.0.8 is eliminated. LCO 3.0.8 applies in MODES 5 and 6 when the associated ACTIONS are not met or an associated ACTION is not provided. In some cases, LCO 3.0.8 is explicitly excluded from being applied by way of a Note. In conjunction with the change to eliminate LCO 3.0.8, these Notes are no longer necessary and are administratively eliminated. The following current reference to LCO 3.0.8 is eliminated: Current TS 3.3.2, Required Action K.1 Note ("LCO 3.0.8 is not applicable.") (renumbered as TS 3.3.13, ESFAS Control Room Air Supply Radiation Instrumentation, Required Action D.1, as discussed in DOC A028.)	L-9	CTS 3.3.2 • Required Action K.1 Note ---------- ITS 3.3.13 • Required Action D.1

Table L
Less Restrictive Changes

DOC No.	TS Section 3.3, Instrumentation **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L12	1. Current TS 3.3.2 ACTIONS related to Functions that result in valve isolation actuations have ACTIONS for inoperable instrumentation channels that vary in consistency. Functions that provide the Applicability modifier Footnotes that allow isolation of the affected valve(s) and exiting the Applicability (i.e., (e), (h), and (i)) are often associated with ACTIONS (i.e., P, R, S, and T) that retain periodic verification of the isolated status, which would no longer be applicable. Some current Required Actions (i.e., P.2.1, Q.1, Z.1, and AA.1.2.1) provide a specific list of acceptable isolation devices while other Required Actions (i.e., R.2.1.1 and S.2.1.2) simply assure the isolated condition is established. ACTION T uniquely allows either a simple requirement of flow path isolation and periodic verification of the isolated condition (Required Actions T.1.1 and T.1.2.2), or an initial simple isolation condition followed later by requiring one of a specific list of acceptable isolation devices with no periodic verification (Required Actions T.1.1 and T.1.2.1). Additionally, ACTIONS Q, R, S, T, and Z (i.e., each ACTION being revised with the exception of ACTION P) have optional default Required Actions for compensatory measures (e.g., unit shutdown) that may be elected in lieu of any requirement to isolate flow paths. These nuances result in increased complexity and introduce an increased potential for confusion and misapplication. Since each of these instrumentation functions support OPERABILITY of the actuated valves, the impact of instrumentation inoperability should be consistent with ACTIONS for the inoperability of the actuated supported system. The simplest approach to achieve this desired result is to allow the supported system's ACTIONS (i.e., for inoperable valves) to dictate the required measures. Therefore, each of the instrumentation Function ACTIONS associated with this change is revised to "Declare affected isolation valve(s) inoperable." This approach is in accordance with LCO 3.0.6, which states: "When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2." In conjunction with this change to the ACTIONS, the Applicabilities for the associated Functions are changed to delete Footnotes that allow exiting the Applicability once the flowpath is isolated (i.e., Footnotes (e), (h), and (i)). This is consistent with changes being made to the Applicability of the various TS for the valves that these Functions actuate. The Applicability and related ACTIONS for these valve and associated system Specifications are being revised as discussed in DOC M15. Changing these Applicabilities is more restrictive in that the revised Applicabilities will maintain tracking of the inoperability and Required Action compliance rather than allowing exiting the (continued)	L-4	CTS 3.3.2 • ACTION: Fns M: 4c *(included because of ITS 3.3.8 ACTION I)* P: 15a Q: 16b, 16d, 17a, 17c R: 6b, 7b, *14b,* 16a 16g S: 4a, 5a, 6a, 7a, 8a, *8c*, 8d T: 15a, 16c, 30a Z: 19a • Table 3.3.2-1 Footnotes (a), (b), (e), (g), (h), (i), (m), (n) --- ITS 3.3.8 • Required Action I.1 Fns 3, 4, 8, 9, 17, 22, 23, 25 • Required Action O.1 Fn 19 • Table 3.3.8-1 Footnotes (b), (c), (g), (j), (k) ITS 3.3.9 • Required Action F.1 Fns 4, 5, 10, 11 • Table 3.3.9-1 Footnote (a) (continued)

DOC No.	TS Section 3.3, Instrumentation **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L12 (cont'd)	1. (continued) Function's Applicability once affected flowpaths are isolated. An additional impact of deleting the Footnote (i) Applicability for current Function 8.d (which leaves Function 8.d with an Applicability of MODES 1, 2, 3, and 4) is to carry that more restrictive Applicability to the "*Coincident with* Reactor Trip (P-4)" Function (i.e., current Function 18.b, which is being reformatted as ITS 3.3.12 as discussed in DOC A028). This will also result in a more restrictive Required Action to exit the more restrictive Applicability as discussed in DOC A028. In comparing the CTS 3.3.2 ACTIONS for an inoperable instrumentation Function against the ACTIONS that result from this change (i.e., the ACTIONS for the associated inoperable valves that the Function actuates), certain ACTIONS are less restrictive while others are more restrictive. While there are both more and less restrictive impacts, the collective differences are not deemed significant. The less restrictive impacts are acceptable based on the appropriateness of the new ACTIONS for the actuated equipment. Since CTS 3.3.2 ACTIONS apply solely to the instrumentation, assuming that the actuated valve(s) are otherwise capable of being opened or closed to its safety position by a unit operator, there is less of an impact on safety with instrumentation-only inoperability than with the valve(s) being incapable of performing the safety function. With valves remaining "available," a means to effect valve closure (e.g., other signals, remote manual capabilities, fail-safe designs) may be available. As such, the ACTIONS provided in the instrumentation Specification should not be more restrictive than the ACTIONS for the actuated components. Therefore, this change maintains the existing level of safety afforded by the current action requirements for inoperable automatic and manual ESF instrumentation functions for supported isolation valves. Current TS 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," ACTIONS related to Functions that result in valve isolation actuations are revised for current ACTIONS P, Q, R, S, T, and Z, as they apply to the following current Table 3.3.2-1 Functions (the corresponding ITS ACTION is provided in brackets "[ ]"): Fn 4 Steam Line Isolation on a. Manual Initiation, MODES 1, 2[(h)], 3[(h)], 4[(h)] ..... ACTION S [F]..... ITS Fn 3.3.9.4 c.(2) **Steam Line Pressure – Negative Rate – High** *(included because of ITS ACTION I)* MODE 3[(g,h)] ..... ACTION M [I]..... ITS Fn 3.3.8.**25** *Fn 5 Turbine Trip on* *a. Fn 6.a, MODES 1, 2 (See DOC A033) ..... ACTION S [F] ..... ITS Fn 3.3.9.5* Note: CTS Table 3.3.2-1 Footnotes modifying the Applicabilities of the above functions are stated below. (continued)	L-4	CTS 3.3.2 • ACTION: Fns M: 4c *(included because of ITS 3.3.8 ACTION I)* P: 15a Q: 16b, 16d, 17a, 17c R: 6b, 7b, *14b,* 16a 16g S: 4a, 5a, 6a, 7a, 8a, *8c*, 8d T: 15a, 16c, 30a Z: 19a • Table 3.3.2-1 Footnotes (a), (b), (e), (g), (h), (i), (m), (n) --- ITS 3.3.8 • Required Action I.1 Fns 3, 4, 8, 9, 17, 22, 23, 25 • Required Action O.1 Fns 19 • Table 3.3.8-1 Footnotes (b), (c), (g), (j), (k) ITS 3.3.9 • Required Action F.1 Fns 4, 5, 10, 11 • Table 3.3.9-1 Footnote (a) (continued)

DOC No.	TS Section 3.3, Instrumentation **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L12 (cont'd)	1. (continued) Current TS 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," ACTIONS related to Functions that result in valve isolation actuations are revised for current ACTIONS P, Q, R, S, T, and Z, as they apply to the following current Table 3.3.2-1 Functions (the corresponding ITS ACTION is provided in brackets "[ ]"): Fn 6 Main Feedwater Control Valve Isolation on a. Manual Initiation, MODES 1, 2, 3, 4(e) ..... ACTION S [F]..... ITS Fn 3.3.9.5 b. **SG Narrow Range Water Level – High 2** *MODES 1, 2..... ACTION R [D]..... ITS Fn 3.3.8.**23*** MODES 3, 4(b,e) ..... ACTION R [I]..... ITS Fn 3.3.8.**23** Fn 7 Main Feedwater Pump Trip and Valve Isolation on *a. Fn 6.a (See DOC A033) ..... ACTION S [F]..... ITS Fn 3.3.9.5* b. **SG Narrow Range Water Level – High 2** *MODES 1, 2..... ACTION R [D]..... ITS Fn 3.3.8.**23*** MODES 3, 4(b,e) ..... ACTION R [I]..... ITS Fn 3.3.8.**23** Fn 8 Startup Feedwater Isolation on a. **SG Narrow Range Water Level – High 2** MODES ~~1, 2,~~ 3, 4(i) (See DOC A032).....ACTION S [I]..... ITS Fn 3.3.8.**23** *c. Fn 6.a (*See *DOC A033) ..... ACTION S [F]..... ITS Fn 3.3.9.5* d. **SG Narrow Range Water Level High** MODES 1, 2, 3, 4(i) .....ACTION S [I]..... ITS Fn 3.3.8.**22** *Coincident with* ..... ITS 3.3.15 Reactor Trip P-4 (see Function 18.b for requirements) ..... ITS 3.3.12 (See DOC A033 and L12) Fn 14 SG Blowdown Isolation on b. **SG Narrow Range Water Level – Low** MODES 1, 2, 3, 4(b,e) ..... ACTION R [F]..... ITS Fn 3.3.8.**20** Fn 15 Boron Dilution Block on a. **Source Range Neutron Flux Doubling** MODES 2(n), 3(n), 4(e)..... ACTION T [I] ..... ITS Fn 3.3.8.**17** MODE 5(e) ..... ACTION P [I] ..... ITS Fn 3.3.8.**17** Note: CTS Table 3.3.2-1 Footnotes modifying the Applicabilities of the above functions are stated below. (continued)	L-4	CTS 3.3.2 • <u>ACTION: Fns</u> M: 4c *(included because of ITS 3.3.8 ACTION I)* P: 15a Q: 16b, 16d, 17a, 17c R: 6b, 7b, *14b,* 16a 16g S: 4a, 5a, 6a, 7a, 8a, *8c*, 8d T: 15a, 16c, 30a Z: 19a • Table 3.3.2-1 Footnotes (a), (b), (e), (g), (h), (i), (m), (n) --- ITS 3.3.8 • Required Action I.1 Fns 3, 4, 8, 9, 17, 22, 23, 25 • Required Action O.1 Fns 19 • Table 3.3.8-1 Footnotes (b), (c), (g), (j), (k) ITS 3.3.9 • Required Action F.1 Fns 4, 5, 10, 11 • Table 3.3.9-1 Footnote (a) (continued)

DOC No.	TS Section 3.3, Instrumentation **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L12 (cont'd)	1. (continued) CTS 3.3.2, "ESFAS Instrumentation," ACTIONS related to Functions that result in valve isolation actuations are revised for current ACTIONS P, Q, R, S, T, and Z, as they apply to the following current Table 3.3.2-1 Functions (the corresponding ITS ACTION is provided in brackets "[ ]"): Fn 16 Chemical Volume and Control System Makeup Isolation on a. **SG Narrow Range Water Level – High 2** *MODES 1, 2 (see DOC A032) ..... ACTION R [D]..... ITS Fn 3.3.8.**23*** MODES 3, 4[b,e] (see DOC A032) ..... ACTION R [I]..... ITS Fn 3.3.8.**23** b. **Pressurizer Water Level – High 1** MODES 1, 2, 3[e] ..... ACTION Q [I] ..... ITS Fn 3.3.8.**8** *Coincident with* (See DOC A033) ..... ITS 3.3.15 Fn 1 Safeguards Actuation on *a. Manual Initiation (MODES 1, 2, 3, 4, 5) ..... ITS Fn 3.3.9.1* *b. **Containment Pressure – High 2** (MODES 1, 2, 3, 4) ..... ITS Fn 3.3.8.**2*** *c. **Pressurizer Pressure – Low** (MODES 1, 2, 3[a]) ..... ITS Fn 3.3.8.**5*** *d. **Steam Line Pressure – Low*** *(MODES 1, 2, 3[a]) (See DOC A032) ..... ITS Fn 3.3.8.**24*** *e. **RCS Cold Leg Temperature (T_{cold}) – Low*** *(MODES 1, 2, 3[a]) ..... ITS Fn 3.3.8.**11*** c. **Pressurizer Water Level – High 2** MODES 1, 2, 3, 4[b,e,m] .....ACTION T [I]..... ITS Fn 3.3.8.**9** d. **Containment Radioactivity – High 2** MODES 1, 2, 3[e] ..... ACTION Q [I]..... ITS Fn 3.3.8.**4** e. Manual Initiation, MODES 1, 2, 3[e], 4[b,e] ..... ACTION R [F]..... ITS Fn 3.3.9.10 f. Fn 15.a (See DOC A033.) ..... ACTION T [I], P[I]..... ITS Fn 3.3.8.**17** g. **SG Narrow Range Water Level High** MODES 1, 2, 3[e], 4[b,e] (See DOC A032) ... ACTION R [I]..... ITS Fn 3.3.8.**22** *Coincident with* (See DOC A033) ..... ITS 3.3.15 Fn 18.b Reactor Trip, P-4 (MODES 1, 2, 3) (See DOC L10) ..... ITS 3.3.12 Note: CTS Table 3.3.2-1 Footnotes modifying the Applicabilities of the above functions are stated below. (continued)	L-4	CTS 3.3.2 • <u>ACTION: Fns</u> M: 4c *(included because of ITS ACTION I)* P: 15a Q: 16b, 16d, 17a, 17c R: 6b, 7b, *14b,* 16a 16g S: 4a, 5a, 6a, 7a, 8a, *8c*, 8d T: 15a, 16c, 30a Z: 19a • Table 3.3.2-1 Footnotes (a), (b), (e), (g), (h), (i), (m), (n) --- ITS 3.3.8 • Required Action I.1 Fns 3, 4, 8, 9, 17, 22, 23, 25 • Required Action O.1 Fn 19 • Table 3.3.8-1 Footnotes (b), (c), (g), (j), (k) TS 3.3.9 • Required Action F.1 Fns 4, 5, 10, 11 • Table 3.3.9-1 Footnote (a) (continued)

DOC No.	TS Section 3.3, Instrumentation **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L12 (cont'd)	1. (continued) CTS 3.3.2, "ESFAS Instrumentation," ACTIONS related to Functions that result in valve isolation actuations are revised for current ACTIONS P, Q, R, S, T, and Z, as they apply to the following current Table 3.3.2-1 Functions (the corresponding ITS ACTION is provided in brackets "[ ]"): Fn 17 Normal Residual Heat Removal System Isolation on a. **Containment Radioactivity – High 2** MODES 1, 2, 3[(e)] (See DOC A032.) ..... ACTION Q [I]..... ITS Fn 3.3.8.**4** b. Fn 1 Safeguards Actuation *MODES 1, 2, 3[(e)] (See DOC A033)..... ITS 3.3.9 Fn 1; ITS 3.3.8 Fns **2, 5, 11, 24*** c. Manual Initiation, MODES 1, 2, 3[(e)] ..... ACTION Q [F] ..... ITS Fn 3.3.9.11 Fn 19 Containment Air Filtration System Isolation on a. **Containment Radioactivity – High 1** MODES 1, 2, 3, 4[(b)] ..... ACTION Z [I]..... ITS Fn 3.3.8.**3** *b. Fn 3 Containment Isolation ..... ITS 3.3.9 Fns 3, 8; ITS 3.3.15; ITS 3.3.16 (See DOC A033)* Fn 30 Component Cooling Water System Containment Isolation Valve Closure on a. **Reactor Coolant Pump Bearing Water Temperature – High** MODES 1, 2, 3, 4 ..... ACTION T [O] ..... ITS Fn 3.3.8.**19** These ACTIONS are revised to "Declare affected isolation valve(s) inoperable" "Immediately" as provided in ITS 3.3.8 Required Action I.1 and Required Action O.1; and in ITS 3.3.9 Required Action F.1. Table 3.3.2-1 Footnotes: (a) Above the P-11 (Pressurizer Pressure) interlock, when the RCS boron concentration is below that necessary to meet the SDM requirements at an RCS temperature of 200°F. ..... ITS Table 3.3.8-1 Footnote (c) (b) With the RCS not being cooled by the RNS. ..... ITS Table 3.3.8-1 Footnote (b) .....ITS Table 3.3.9-1 Footnote (a) (e) ~~Not applicable for valve isolation Functions whose associated flow path is isolated.~~ (g) Below the P-11 (Pressurizer Pressure) interlock.....ITS Table 3.3.8-1 Footnote (k) (h) ~~Not applicable if all MSIVs are closed.~~ (i) ~~Not applicable when the startup feedwater flow paths are isolated.~~ (m) Above the P-19 (RCS Pressure) interlock **with the RCS not being cooled by RNS**. (See DOC A036) ..... ITS Table 3.3.8-1 Footnote (g) (n) Not applicable when critical or during intentional approach to criticality. ..... ITS Table 3.3.8-1 Footnote (j)	L-4	CTS 3.3.2 • <u>ACTION: Fns</u> M: 4c *(included because of ITS ACTION I)* P: 15a Q: 16b, 16d, 17a, 17c R: 6b, 7b, *14b,* 16a 16g S: 4a, 5a, 6a, 7a, 8a, *8c*, 8d T: 15a, 16c, 30a Z: 19a • Table 3.3.2-1 Footnotes (a), (b), (e), (g), (h), (i), (m), (n) --- ITS 3.3.8 • Required Action I.1 Fns 3, 4, 8, 9, 17, 22, 23, 25 • Required Action O.1 Fn 19 • Table 3.3.8-1 Footnotes (b), (c), (g), (j), (k) ITS 3.3.9 • Required Action F.1 Fns 4, 5, 10, 11 • Table 3.3.9-1 Footnote (a)

Table L
Less Restrictive Changes

DOC No.	TS Section 3.3, Instrumentation **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L12 (cont'd)	2. Current TS Table 3.3.2-1 Applicability modifier Footnote (e) "Not applicable for valve isolation Functions whose associated flow path is isolated" is deleted and applies to CTS Functions 6a, 6b, 7a, 7b, 14b, 15a, 16a, 16b, 16c, 16d, 16f, 16g, 17a, 17b, and 17c as noted above in the description of Change No. 1:	L-2	CTS Table 3.3.2-1 Footnote (e) • Applicability of Fns 6a, 6b, 7a, 7b, 14b, 15a, 16a, 16b, 16c, 16d, 16f, 16g, 17a, 17b, and 17c --- ITS Table 3.3.8-1 • Applicability of Fns 3, 4, 8, 9, 17, 22, 23, and 25 ITS Table 3.3.9-1 • Applicability of Fns 4, 5, 10, and 11
	3. Current TS Table 3.3.2-1 Applicability modifier Footnote (h) "Not applicable if all MSIVs are closed" is deleted and applies to CTS 3.3.2 Steam Line Isolation Functions 4a, 4b, 4c, and 4d as noted above in the description of Change No. 1:.	L-2	CTS Table 3.3.2-1 Footnote (h) • Applicability of Fns 4a, 4b, 4c(1), 4c(2), and 4d --- ITS Table 3.3.8-1 • Applicability of Fns 2, 24, 25 ITS Table 3.3.9-1 • Applicability for Fn 4
	4. Current TS Table 3.3.2-1 Applicability modifier Footnote (i) "Not applicable when the startup feedwater flowpaths are isolated" is deleted, and applies to CTS 3.3.2 Startup Feedwater Isolation Functions 8a and 8d as noted above in the description of Change No. 1:.	L-2	CTS Table 3.3.2-1 Footnote (i) • Applicability of Fns 8a, 8d --- ITS 3.3.8 • Applicability of Fns 22, 23
	5 The changes to the CTS 3.3.2 ACTIONS, as described above result in a requirement to "Declare affected isolation valve(s) inoperable" "Immediately" as provided in ITS 3.3.8 Required Action I.1 and Required Action O.1; and in ITS 3.3.9 Required Action F.1. The effect of these changes combined with other changes in Applicability footnotes and changes to the Specifications for the systems with the isolation valves are briefly summarized for each affected ESFAS Function, as follows:	L-4	CTS 3.3.2 Fns 4.a, 4.c.(2), 6.a, 6.b, 7.a, 7.b, --- ITS 3.3.8 Fns 23, 25 ITS 3.3.9 Fn 4

DOC No.	TS Section 3.3, Instrumentation **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L12 (cont'd)	5.1 CTS 3.3.2 Fn 4.a, **Steam Line Isolation - Manual Initiation**, MODES 1, 2[(h)], 3[(h)], 4[(h)], and ACTION S becomes ITS 3.3.9 Fn 4, MODES 1, 2, 3, 4, and ACTION F. CTS 3.3.2, ACTION S applies for inoperabilities of the manual actuation for steam line isolation. The valves isolated for this Function include main steam isolation valves, turbine stop and control valves, turbine bypass valves, and moisture separator reheater 2nd stage steam isolation valves. These valves are addressed in CTS 3.7.2, which is being editorially renamed "Main Steam Line Flow Path Isolation Valves" (refer to DOC A094 for discussion of this renaming). Certain ACTIONS imposed in ITS 3.7.2 ACTIONS (as changed by DOC M11 and DOC M15) are less restrictive than CTS 3.3.2 ACTION S as a result of ITS 3.3.9, ACTION F declaring affected isolation valve(s) inoperable. Both CTS and ITS ACTIONS require placing the unit in MODE 3, placing the unit in MODE 4 with Normal Residual Heat Removal System (RNS) in service, isolating the flow path, and placing the unit in MODE 5. However, CTS 3.7.2 also requires placing the unit in MODE 2. A comparison of the completion times associated with each of these Required Actions shows that the cumulative times required by ITS 3.3.9 and ITS 3.7.2 to isolate the affected flow path is more restrictive than CTS 3.3.2 ACTION S (14 hours vs. 30 hours), but that the cumulative times for the action to be in MODE 3 (20 hours vs. 6 hours), in MODE 4 with RNS inservice (38 hours vs. 24 hours), and in MODE 5 (50 hours vs. 42 hours) are less restrictive than ACTION S.	L-4	CTS 3.3.2 • Fn 4.a • ACTION S CTS 3.7.2 • ACTIONS --- ITS 3.3.9 • Fn 4, MODES 1, 2, 3, 4, • ACTION F ITS 3.7.2 • ACTIONS
	5.2 Additionally, current TS 3.3.2, Action M applies for inoperabilities of Fn 4.c.(2) **Steam Line Isolation - Steam Line Pressure – Negative Rate – High**. While the current Action M does not explicitly provide for isolation of the affected penetrations, the current Applicability for this Function includes footnote (h) ("Not applicable if all MSIVs are closed"), which implicitly allows isolation and exiting the Applicability (implied within the 12 hours specified by Required Action M.2 to be in MODE 4). As such, ITS 3.3.8 Required Action I.1 ("Declare affected isolation valve(s) inoperable. | Immediately") is also applied to this Function (ITS 3.3.8 Fn 25). Since this Function is only applicable in MODE 3 below the P-11 (Pressurizer Pressure) interlock, only CTS 3.3.2 Required Action M.2 to be in Mode 4 in 12 hours has bearing. ITS 3.7.2 Required Action D.1 requires flow path isolation in 8 hours; ITS 3.7.2 Required Action F.1, which requires placing the unit in MODE 3 in 6 hours, has no bearing since ITS 3.3.8 Fn 25 only applies in MODE 3 below P-11; and Required Action F.2 requires placing the unit in MODE 4 with RNS in service in 24 hours (32 hours cumulative). A comparison of the completion times associated with each of these Required Actions shows that the cumulative times required by ITS 3.3.8 Required Action I.1 and ITS 3.7.2 Required Action D.1 to isolate the affected flow path is more restrictive than CTS 3.3.2 Required Action M.1 (8 hours vs. 12 hours [implied]), but that the cumulative times required by ITS 3.3.8 Required Action I.1, and ITS 3.7.2 Required Actions D.1 and F.2 for the action to be in MODE 4 with RNS inservice (32 hours vs. 24 hours) are less restrictive than CTS 3.3.2 Required Actions M.1 and M.2.	L-4	CTS 3.3.2 • Fn 4.c.(2), MODE 3[(g, h)] • Condition M • Required Action M.2 • Table 3.3.2-1 Footnote (h) CTS 3.7.2 • ACTIONS --- ITS 3.3.8 • Fn 25, MODE 3[(k)] • Condition I • Required Action I.1 ITS 3.7.2 • ACTIONS D, F

DOC No.	TS Section 3.3, Instrumentation **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L12 (cont'd)	5.3 Current TS 3.3.2, Action R applies for inoperabilities of CTS 3.3.2 Fn 6.b, "Main Feedwater Control Valve Isolation on **SG Narrow Range Water Level – High 2**" and Fn 7.b, "Main Feedwater Pump Trip and Valve Isolation on **SG Narrow Range Water Level – High 2,**" which are the Functions that isolate main feedwater isolation valves (MFIVs) and main feedwater control valves (MFCVs). These valves are addressed in CTS 3.7.3, MFIVs and MFCVs. (See Table A, DOC A028, Change No. 3.23, for details of reformatting of CTS 3.3.2 Fns 6.b and 7.b, and ACTION R into ITS 3.3.8 Fn 23 and ACTION I with ITS 3.7.3 ACTIONS B and C.) Only the ITS 3.7.3 new Required Action C.2 to be in MODE 4 with RNS in service in 24 hours is less restrictive than current TS 3.3.2 Action R as a result of ITS 3.3.8 new ACTION I (which applies to ITS 3.3.8 Fn 23 in MODES 3 and 4) declaring affected isolation valve(s) inoperable immediately. Both current and new Required Actions (as changed by DOC M11 and DOC M15) require placing the unit in • MODE 3 in 6 hours (ITS 3.3.8 Required Action C.1), • MODE 4 with RNS in service in 24 hours (ITS 3.3.8 Required Action I.1 combined with ITS 3.7.3 Required Action C.2), and • Isolating the flow path in 8 hours (ITS 3.7.3 Required Action B.1), and • Placing the unit in MODE 5 (ITS 3.7.3 Required Action C.3) . A comparison of the completion times associated with each of these Required Actions shows that the cumulative times of ITS 3.3.8 ACTION I and ITS 3.7.3 ACTION B are more restrictive in isolating the flow path than CTS 3.3.2 ACTION R (8 hours vs. 12 hours), but less restrictive in placing the unit in MODE 3 ([8 + 6 =] 14 hours vs. 6 hours), and MODE 4 with RNS in service ([8 + 24 =] 32 hours vs. 30 hours).	L-4	CTS 3.3.2 • Fns 6.b, 7.b • Condition R • Required Action R.2 • Table 3.3.2-1 Footnote (h) CTS 3.7.3 • ACTIONS --- ITS 3.3.8 • Fn 23, MODE 3[g, h] • Condition I • Required Action I.1 ITS 3.7.2 ACTIONS D, F
	5.4 Current TS 3.3.2, Action S applies for inoperabilities of CTS 3.3.2 Fn 6.a, "Main Feedwater Control Valve Isolation – Manual" and Fn 7.a, "Main Feedwater Pump Trip and Valve Isolation – Manual" which are the Functions that isolate main feedwater isolation valves (MFIVs) and main feedwater control valves (MFCVs). These valves are addressed in CTS 3.7.3, MFIVs and MFCVs. Certain Actions imposed in new TS 3.7.3 ACTIONS (as changed by DOC M11 and DOC M15) are less restrictive than current TS 3.3.2 ACTION S as a result of new ITS 3.3.9, Required Action F.1 declaring affected isolation valve(s) inoperable. Both current and new Required Actions require placing the unit in • MODE 3, (ITS 3.3.9 Required Action C.1) • MODE 4 with RNS in service, and • Isolating the flow path in 8 hours (ITS 3.7.3 Required Action B.1), and • Placing the unit in MODE 5. (continued)	L-4	CTS 3.3.2, Action S CTS 3.7.3 --- ITS 3.3.9 • Required Action C.1 • Required Action F.1 ITS 3.7.3 • Required Action B.1 (continued)

Table L
Less Restrictive Changes

DOC No.	TS Section 3.3, Instrumentation **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L12 (cont'd)	5.4 (continued) A comparison of the completion times associated with each of these Required Actions shows that the cumulative times of ITS 3.3.8 ACTION I and ITS 3.7.3 ACTIONS B and C are more restrictive in isolating the flow path than CTS 3.3.2 ACTION S (8 hours vs. 30 hours), but less restrictive in placing the unit in • MODE 3 ([8 + 6 =] 14 hours vs. 6 hours), • MODE 4 with RNS in service ([8 + 24 =] 32 hours vs. 24 hours), and in • MODE 5 ([8 + 36 =] 44 hours vs. 42 hours).	L-4	CTS 3.3.2, Action S CTS 3.7.3 --- ITS 3.3.9 • Required Action C.1 • Required Action F.1 ITS 3.7.3 • Required Action B.1
	5.5 Current TS 3.3.2, Action S applies for one or more inoperable channels **of SG Narrow Range Water Level – High 2**, which support ESF actuation Functions that isolate startup feedwater flow paths (Fns 8.a and 8.d) . The valves isolated for this Function include startup feedwater control valves and startup feedwater isolation valves. These valves are addressed in TS 3.7.7. A comparison of the completion times associated with each of the applicable Required Actions shows that the cumulative times of ITS 3.3.8 ACTION I and ITS 3.7.7 ACTIONS B and C are more restrictive in isolating the flow path than CTS 3.3.2 ACTION S (8 hours vs. 30 hours), but less restrictive in placing the unit in • MODE 3 ([8 + 6 =] 14 hours vs. 6 hours), • MODE 4 with RNS in service ([8 + 24 =] 32 hours vs. 24 hours), and in • MODE 5 ([8 + 36 =] 44 hours vs. 42 hours).	L-4	CTS 3.3.2, Action S CTS 3.7.7 --- ITS 3.3.8 • Required Action I.1 ITS 3.7.7 • Required Action B.1 • Required Actions C.1, C.2, and C.3
	5.6 The following CTS 3.3.2 ESF actuation functions also have overall less restrictive (longer completion times) actions to be in lower MODES; details of the comparison between current and new actions completion times are omitted here, but are provided in the LAR Enclosure 1 under DOC L12. • Function 4, Steam Line Isolation (see above) (TS 3.7.2) • Function 6, Main Feedwater Control Valve Isolation, and Function 7, Main Feedwater Pump Trip and Valve Isolation (see above) (TS 3.7.3) • Function 8, Startup Feedwater Isolation (TS 3.7.7) • Function 14, SG Blowdown Isolation (TS 3.7.10) • Function 15, Source Range Neutron Flux Doubling (TS 3.1.9) • Function 16, Chemical Volume and Control System Makeup Isolation (ITS 3.1.9) • Function 17, Normal Residual Heat Removal System Isolation (TS 3.6.3) • Function 19, Containment Air Filtration System Isolation (TS 3.6.3) • Function 30, Component Cooling Water System Containment Isolation Valve Closure (TS 3.6.3)	L-4	CTS 3.3.2 ACTION M, P, Q, R, S, T, Z --- ITS 3.1.9 ACTION B and LCO 3.0.3 ITS 3.3.8 ACTION I, O ITS 3.3.9 ACTION F ITS 3.6.3 ACTION B, C ITS 3.7.2 ACTION B, C ITS 3.7.3 ACTION B, C ITS 3.7.7 ACTION B, C ITS 3.7.10 ACTION C, D, E

Table L
Less Restrictive Changes

DOC No.	TS Section 3.3, Instrumentation **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L18	1. Current TS 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," Table 3.3.2-1, Function 3.a, Containment Isolation on Manual Initiation, is revised to delete “MODES 5 and 6” from the Applicability. See DOC L18 Change No. 2 in the TS Section 3.6 part of Table L for discussion of the proposed change in Applicability of CTS 3.3.2 Fn 3.a.	L-2	CTS 3.3.2 Fn 3.a • Applicability --- ITS 3.3.9 Fn 4 • Applicability
L13	Current TS 3.3.3, "Post Accident Monitoring (PAM) Instrumentation," Table 3.3.3-1, "Post-Accident Monitoring Instrumentation," is revised as follows: 1. Function 12 is revised from "Passive Residual Heat Removal (PRHR) Flow and PRHR Outlet Temperature," to "Passive Residual Heat Removal (PRHR) Heat Removal." In addition, the Required Channels/Divisions column is revised from "2 flow & 1 temperature," to "2." Function 12 is currently designated as "Passive Residual Heat Removal (PRHR) Flow and PRHR Outlet Temperature." As stated in the associated Bases, PRHR flow is provided to monitor primary system heat removal. Likewise, PRHR outlet temperature is provided to monitor primary system heat removal. The function that is being monitored is related to PRHR heat removal. Therefore, the appropriate Function designation is revised to "Passive Residual Heat Removal (PRHR) Heat Removal." Details related to the parameters used to monitor the Function are more appropriately described in the associated bases. Currently, TS Table 3.3.3-1 requires a total of three channels to be OPERABLE for Function 12; two flow instrument channels and one temperature instrument channel. The proposed change requires that two channels of PRHR heat removal instrumentation be OPERABLE. The details of which instrumentation can satisfy this requirement are more appropriately described in the associated bases. Final Safety Analysis Report ~~(~~FSAR~~)~~ Table 7.5-1, "Post Accident Monitoring System," indicates that PRHR outlet temperature is a diverse variable for PRHR flow. As such, the PRHR outlet temperature channel can be used to satisfy one of the two required channels when the PRHR Flow channel in the same electrical division is inoperable. The specific channels designed to satisfy the PAM requirements are more appropriately described in the associated bases. Regulatory Guide 1.97, Revision 3, PAM requirements include redundancy for required monitoring functions. The current TS 3.3.3 ACTIONS are constructed based on loss of redundancy (ACTION A, one channel inoperable) and loss of parameter monitoring (ACTION C, two channels inoperable). Current TS Table 3.3.3-1, Function 12 requires a total of three channels each, which exceeds the minimum necessary to meet the standard TS requirements (continued)	L-1	CTS 3.3.3 Fn 12 • LCO --- ITS 3.3.17 Fn 12 • LCO (continued)

Table L
Less Restrictive Changes

DOC No.	TS Section 3.3, Instrumentation **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L13 (cont'd)	1. (continued) that only require a minimum of two channels per Function for redundancy. These changes reduce the number of required channels from three to two, consistent with NUREG-1431 requirements for meeting Regulatory Guide (RG) 1.97 PAM redundancy requirements. The change also relocates the details of the specific channels designed to satisfy the PAM requirements to the associated bases. The removal of the third channel that can optionally be utilized to meet redundancy requirements continues to assure the TS to provide adequate protection of public health and safety. The proposed TS retain the necessary requirements to ensure the required RG 1.97 PAM redundancy requirements are met. Changes to the TS bases are controlled by the TS Bases Control Program described in TS 5.5.6. This program provides for the evaluation of bases changes to ensure the TS bases are properly controlled. This change is designated as a less restrictive change because it reduces the number of required OPERABLE channels from "3" to "2".	L-1	CTS 3.3.3 Fn 12 • LCO --- ITS 3.3.17 Fn 12 • LCO
	2. Function 17 is revised from "Passive Containment Cooling System (PCS) Storage Tank Level and PCS Flow," to "Passive Containment Cooling System (PCS) Heat Removal." In addition, the Required Channels/Divisions column is revised from "2 level & 1 flow," to "2." Function 17 is currently designated as "Passive Containment Cooling System (PCS) Storage Tank Level and PCS Flow." The associated bases state that the tank level instruments provide indication that sufficient water is available to meet this requirement, and that the flow instrument provides a diverse indication of the PCS heat removal capability. The function that is being monitored is related to PCS heat removal. Therefore, the appropriate Function designation is revised to "Passive Containment Cooling System (PCS) Heat Removal." The specific channels designed to satisfy the PAM requirements are more appropriately described in the associated bases. Currently, TS Table 3.3.3-1 requires that a total of three channels be OPERABLE for Function 17; two level instrument channels and one PCS flow instrument channel. The proposed change requires that two channels of PCS heat removal instrumentation are OPERABLE. The details of which instrumentation can satisfy this requirement are more appropriately described in the associated bases. The associated bases indicate that the PCS flow instrument provides a diverse indication of PCS heat removal capability. As such, the PCS flow channel can be used to satisfy one of the two required channels when the PCS level channel in the same electrical division is inoperable. The specific channels designed to satisfy the PAM requirements are more appropriately described in the associated bases. Regulatory Guide 1.97, Revision 3, PAM requirements include redundancy for required monitoring functions. The current TS 3.3.3 ACTIONS are constructed based on loss of redundancy (Action A, one channel inoperable) and loss of parameter monitoring (continued)	L-1	CTS 3.3.3 Fn 17 • LCO --- ITS 3.3.17 Fn 17 • LCO (continued)

Table L
Less Restrictive Changes

DOC No.	TS Section 3.3, Instrumentation **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L13 (cont'd)	2. (continued) (Action C, two channels inoperable). Current TS Table 3.3.3-1, Function 17 requires a total of three channels, which exceeds the minimum necessary to meet the standard TS requirements that only require a minimum of two channels per Function for redundancy. These changes reduce the number of required channels from three to two, consistent with NUREG-1431 guidance for meeting Regulatory Guide (RG) 1.97 PAM redundancy requirements. The change also relocates the details of the specific channels designed to satisfy the PAM requirements to the associated bases. The removal of the third channel that can optionally be utilized to meet redundancy requirements continues to assure that the TS provide adequate protection of public health and safety. The proposed TS retain the necessary requirements to ensure the required RG 1.97 PAM redundancy requirements are met. Changes to the TS bases are controlled by the TS Bases Control Program described in TS 5.5.6. This program provides for the evaluation of bases changes to ensure the TS bases are properly controlled. This change is designated as a less restrictive change because it reduces the number of required OPERABLE channels from "3" to "2".	L-1	CTS 3.3.3 Fn 17 • LCO --- ITS 3.3.17 Fn 17 LCO
L14	1. Current TS 3.3.5, "Diverse Actuation System (DAS) Manual Controls," Table 3.3.5-1, "DAS Manual Controls," footnote b is revised from "With the <u>calculated</u> reactor decay heat > 6.0 MWt," to "With the reactor decay heat > 6.0 MWt." (See TS Sections 3.6 and 3.7 for other L14 changes.) The affected specification ensures that the appropriate structures, systems, and components are OPERABLE and that the appropriate testing is performed when reactor decay heat or fuel storage pool decay heat are above specified values, as applicable. The use of "calculated" is a method of determination that is not required to be included in the TS to properly interpret the applicability requirement. This change is consistent with how decay heat is used to modify requirements stated in TS Table 1.1-1, "MODES," footnote (a), and in current TS Table 3.3.2-1, "Engineered Safeguards Actuation System Instrumentation," footnote (f). This change is less restrictive because it removes a specific method of how the decay heat is determined to meet LCO requirements.	L-2	CTS 3.3.5 • Applicability --- ITS 3.3.19 • Applicability

Types of Less Restrictive Changes in TS Section 3.3:

- L-1 Relaxation of LCO Requirement
- L-2 Relaxation of Applicability Requirement
- L-4 Relaxation of Required Action
- L-7 Replacement of SR with Equivalent Requirement
- L-9 Deletion of LCO 3.0.8

Table L
Less 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
L01 (cont'd)	Current TS 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," SR 3.3.2.7 ("Perform ACTUATION DEVICE TEST") and SR 3.3.2.8 ("Perform ACTUATION DEVICE TEST for squib valves") are deleted from current TS 3.3.2 and Table 3.3.2-1, Function 26.a, ESF Actuation Subsystem. The equivalent requirement (using phrasing generally consistent with NUREG-1431) is included in individual Specifications for the actuated devices with the same 24 month Frequency as the deleted SRs. The following are the SRs being added: 10. New SR 3.4.11.4 is added to TS 3.4.11, "Automatic Depressurization System (ADS) – Operating," stating: "Verify each stage 1, 2, and 3 ADS valve actuates to the open position on an actual or simulated actuation signal."	L-7	CTS 3.3.2 • SR 3.3.2.7 --- ITS 3.4.11 • SR 3.4.11.4
	11. New SR 3.4.11.5 is added to TS 3.4.11, stating: "Verify continuity of the circuit from the Protection Logic Cabinets to each stage 4 ADS valve;" also including a Note to the SR stating: "Squib actuation may be excluded."	L-7	CTS 3.3.2 • SR 3.3.2.7 --- ITS 3.4.11 • SR 3.4.11.5
	12. Current TS 3.4.13, "Automatic Depressurization System (ADS) – Shutdown, RCS Open," SR 3.4.13.2 is revised to include listing of proposed SR 3.4.11.5.	L-7	CTS 3.3.2 • SR 3.3.2.7 --- ITS 3.4.13 • SR 3.4.13.2
L07 (cont'd)	Certain current TS Required Actions requiring the reactor trip breakers (RTBs) to be opened are revised into two Required Actions. One Required Action states "initiate action to fully insert all rods," and the other Required Action states "place the Plant Control System in a condition incapable of rod withdrawal." The specific Required Actions revised are: 3. Current TS 3.4.4, "RCS Loops," • Required Action A.1, "Be in MODE 3 with the reactor trip breakers open;" and • Required Action B.1, "Open reactor trip breakers." See discussion of DOC L07 Item 1 in TS Section 3.3 for justification of the proposed changes.	L-4	CTS 3.4.4 • Required Action A.1 • Required Action B.1 --- ITS 3.4.4 • Required Actions A.2, A.3, A.4 • Required Actions B.2, B.3
	4. Current TS 3.4.5, "Pressurizer," • Required Action A.2.1, "Be in MODE 3 with reactor trip breakers open." See discussion of DOC L07 Item 1 in TS Section 3.3 for justification of the proposed changes.	L-4	CTS / ITS 3.4.5 • Required Action A 2.1 --- ITS 3.4.5 • Required Actions A.1, A 2, A.3

DOC No.	TS Section 3.4 - Reactor Coolant System **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L07 (cont'd)	Current TS Applicabilities associated with RTB position are being revised. Applicabilities of "With RTBs closed and Plant Control System capable of rod withdrawal" or "Whenever the reactor trip breakers are closed" are revised to state "With Plant Control System capable of rod withdrawal or one or more rods not fully inserted." Conversely, Applicabilities that include "RTBs open" are revised to address the condition of Plant Control System incapable of rod withdrawal and all rods fully inserted. The specific Applicabilities revised are: 5. Current TS 3.4.4, Applicability, "MODES 3, 4, and 5, whenever the reactor trip breakers are closed." See DOC L07 Change No. 2 in TS Section 3.3 of this table for discussion of the basis of the proposed changes.	L-2	CTS / ITS 3.4.4 • Applicability
	6. Current TS 3.4.8, "Minimum RCS Flow," Applicability, "MODES 3, 4, and 5, whenever the reactor trip breakers are open and with unborated water sources not isolated from the RCS." See discussion of DOC L07 Item 2 in TS Section 3.3 for justification of the proposed changes.	L-2	CTS / ITS 3.4.8 • Applicability
	7. Current TS 3.4.4, Condition A Note reference to "Required Action A.1" is revised to "Required Actions" and Condition B Note reference to "Required Action B.1" is revised to "Required Actions." This is an administrative change to conform current requirements to the new presentation.	L-4	CTS / ITS 3.4.4 • Condition A Note • Condition B Note

Table L
Less 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
L15	1. TS 3.4.8, "Minimum RCS Flow," SR 3.4.8.1 is revised from "Verify that at least one RCP is in operation *at ≥ 10% rated speed or equivalent*," to " Verify at least one RCP is in operation **with total flow through the core ≥ 3,000 gpm**." 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. Surveillance Requirements are intended to periodically verify that the LCO is met. However, SR 3.4.8.1 currently requires verification that at least one RCP is operating at ≥ 10% rated speed or equivalent, which will result in expected flow through the RCP of 7875 gpm (reference AP1000 Design Certification Amendment, the Westinghouse Electric Company (WEC) response to Open Item OI-SRP16-CTSB- 62, dated July 15, 2009). The 3000 gpm in the LCO is associated with the initial condition in the analysis of a possible Boron Dilution Event (BDE) in MODE 3, 4, or 5 for minimum mixing flow in the RCS. SR 3.4.8.1 is revised to reflect this value for consistency with the LCO. As stated in the response to RAI-SRP16-CTSB-62 (reference WEC response dated December 17, 2008), and repeated in the response to OI-SRP16-CTSB-62, dated July15, 2009, the expected operating limit on the RCP minimum speed is expected to be higher than 10%. This results in design margin to the 3000 gpm LCO value. The operating limit takes into account minimizing stress and wear, and increasing equipment life, and not the input assumptions for the Boron Dilution Analysis. Surveillance acceptance criteria should match the LCO requirement to verify that the minimum flow rate is met. Operational margin details that account for minimizing stress and wear, and increasing equipment life and the expected operating limit on minimum RCP speed, are more appropriately controlled in the design and in procedures associated with operating and testing the RCPs. This change is less restrictive because the proposed acceptance criteria will allow the SR to be met at a lower RCS flow rate.	L-5	CTS / ITS 3.4.8 • LCO 3.4.8 • SR 3.4.8.1

Table L
Less 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
L16	1. Current TS 3.4.10, "RCS Specific Activity," ACTIONS are revised by deleting Required Action B.1, "Perform SR 3.4.10.2," within 4 hours. In the event the Dose Equivalent XE-133 concentration is > 280 µCi/gm, the current TS 3.4.10 ACTIONS require entry into Condition B. Within 4 hours of entering Condition B, Required Action B.1 requires SR 3.4.10.2 to be performed. SR 3.4.10.2 verifies that the reactor coolant Dose Equivalent I-131 specific activity is ≤ 1.0 µCi/gm. In addition, upon entry into Condition B, Required Action B.2 currently requires that the plant be placed in MODE 3 with T_{avg} < 500°F within 6 hours. CTS 3.4.10 does not specify a default condition to enter in the event the current Required Action B.1 is not completed within 4 hours. Current Required Action B.2 requires placing the plant in MODE 3 with T_{avg} < 500°F within 6 hours. However, during this required shutdown, the unit operator may be distracted by the need to perform the current Required Action B.1. Therefore, deleting the current Required Action B.1 results in reducing operator burden in the event Condition B is entered. With the proposed change, the remaining required action will continue to require that the unit be removed from the Applicability of TS 3.4.10 in the event Condition B is entered. Performing SR 3.4.10.2 within 4 hours of entering Condition B does not result in a more conservative action in the event the Dose Equivalent I-131 is found not within limits, because the plant is already required to be in MODE 3 with T_{avg} < 500°F within 6 hours by the current Required Action B.2. This provides assurance that requirements of the safety analyses are preserved. This change is less restrictive because it removes an action currently required to be performed.	L-4	CTS 3.4.10 • Required Action B.1 • Required Action B.2 --- ITS 3.4.10 • Required Action B.1

Types of Less Restrictive Changes in TS Section 3.4:

L-4 Relaxation of Required Action

L-5 Relaxation of SR Testing Limitations

L-7 Replacement of SR with Equivalent Requirement

Table L
Less 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
L01 (cont'd)	Current TS 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," SR 3.3.2.7 ("Perform ACTUATION DEVICE TEST") and SR 3.3.2.8 ("Perform ACTUATION DEVICE TEST for squib valves") are deleted from current TS 3.3.2 and Table 3.3.2-1, Function 26.a, ESF Actuation Subsystem. The equivalent requirement (using phrasing generally consistent with NUREG-1431) is included in individual Specifications for the actuated devices with the same 24 month Frequency as the deleted SRs. The following are the SRs being added in TS Section 3.5: 13. SR 3.5.2.7 is added to TS 3.5.2, "Core Makeup Tanks (CMTs) – Operating," stating: "Verify each CMT outlet isolation valve actuates to the open position on an actual or simulated actuation signal." Consequently, current SR 3.5.2.7 is renumbered as SR 3.5.2.8.	L-7	CTS 3.3.2 Fn 26.a • SR 3.3.2.7 CTS 3.5.2 • SR 3.5.2.7 --- ITS LCO 3.3.15.b ITS 3.5.2 • SR 3.5.2.7 • SR 3.5.2.8
	14. SR 3.5.4.8 is added to TS 3.5.4, "Passive Residual Heat Removal Heat Exchanger (PRHR HX) – Operating," stating: "Verify both PRHR HX air operated outlet isolation valves actuate to the open position and both IRWST gutter isolation valves actuate to the isolation position on an actual or simulated actuation signal." Consequently, some subsequent SRs are appropriately renumbered.	L-7	CTS 3.3.2 • SR 3.3.2.7 --- ITS 3.5.4 • SR 3.5.4.8
	15. SR 3.5.6.9 is added to TS 3.5.6, "In-containment Refueling Water Storage Tank (IRWST) – Operating," stating: "Verify continuity of the circuit from the Protection Logic Cabinets to each IRWST injection and containment recirculation squib valve on an actual or simulated actuation signal;" also including a Note to the SR stating: "Squib actuation may be excluded." Consequently, current SR 3.5.6.9 and SR 3.5.6.10 are renumbered as SR 3.5.6.10 and SR 3.5.6.11, respectively.	L-7	CTS 3.3.2 • SR 3.3.2.7 --- ITS 3.5.6 • SR 3.5.6.9
	16. Current TS 3.5.8, "In-containment Refueling Water Storage Tank (IRWST) – Shutdown, MODE 6," SR 3.5.8.4 is revised to address new SR 3.5.6.9 by adding the renumbered SR 3.5.6.11.	L-7	CTS 3.3.2 • SR 3.3.2.7 --- ITS 3.5.8 • SR 3.5.8.4
L17	1. Current TS 3.5.2, "Core Makeup Tanks (CMTs) - Operating," is revised as follows: • Condition D is revised from "One CMT *inoperable due to presence of noncondensible gases in one high point vent*," to "One CMT **inlet line with noncondensible gas volume not within limit**." • Required Action D.1 is revised from "*Vent noncondensible gases*," to "**Restore CMT inlet line noncondensible gas volume to within limit**." As stated in the associated Bases for the current TS 3.5.2, TS 3.5.4, TS 3.5.5, TS 3.5.6, TS 3.5.7, and TS 3.5.8 Actions, the presence of some noncondensible gases does not mean that the CMT, PRHR HX, or IRWST injection capability is immediately inoperable, but that gases are collecting (continued)	L-4	CTS / ITS 3.5.2 • Condition D • Required Action D.1 (continued)

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
L17 (cont'd)	1. (continued) and should be vented. In addition, the associated LCO bases for current TS 3.5.2, TS 3.5.4, and TS 3.5.6 state that a relatively small gas volume was incorporated into the design for alerting operators to provide sufficient time to initiate venting operations before the gas volume would be expected to increase to a sufficient volume that might potentially challenge the OPERABILITY of natural circulation flow. The current language of TS 3.5.2, Condition D, TS 3.5.4, Condition C, TS 3.5.6, Condition B and Condition C, is not consistent with the intent of the LCO, as described in the bases. Therefore, the Conditions are revised for consistency with the LCO as described in the associated bases. TS 3.5.5, Condition C, TS 3.5.7, Conditions B and C, and TS 3.5.8, Conditions B and C, are revised for consistency. These changes are designated as less restrictive because the Actions will not be required for small volumes of noncondensible gas accumulations in the PRHR HX high point vents and the IRWST squib valve outlet pipe stubs. Current TS 3.5.2, Required Action D.1, TS 3.5.4, Required Action C.1, TS 3.5.5, Required Action C.1, TS 3.5.6, Required Action B.1, TS 3.5.6, Required Action C.1, TS 3.5.7, Required Action B.1, TS 3.5.7 Required Action C.1, TS 3.5.8, Required Action B.1, and TS 3.5.8, Required Action C.1 are revised to replace a specific method of restoration with a more general action to restore the parameter, in this case noncondensible gas volume, to within its limit. This change is made for consistency with the revised entry conditions associated with the Required Actions. Only the specific method is deleted from the action. The associated bases, both current and revised, describe an appropriate method for restoration. Changes to the bases are controlled by the TS Bases Control Program. This program provides for the evaluation of changes to ensure the bases are properly controlled. The revised ACTIONS continue to provide assurance that operation with a noncondensible gas volume that can affect the associated flow path is allowed for only a limited period of time. These changes are designated as less restrictive because the specific method of restoration is deleted and replaced with a more general requirement to restore within the limit.	L-4	CTS / ITS 3.5.2 • Condition D • Required Action D.1
	2. Current TS 3.5.4, "Passive Residual Heat Removal Heat Exchanger (PRHR HX) – Operating," is revised as follows: • Condition C is revised from "*Presence of non-condensible gases in the high point vent*," to "**PRHR HX inlet line noncondensible gas volume not within limit**." • Required Action C.1 is revised from "*Vent noncondensible gases*," to "**Restore PRHR HX inlet line noncondensible gas volume to within limit**." See discussion of DOC L17 Item 1 for justification of the proposed changes.	L-4	CTS / ITS 3.5.4 • Condition C • Required Action C.1

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
L17 (cont'd)	3. Current TS 3.5.5, "Passive Residual Heat Removal Heat Exchanger (PRHR HX) – Shutdown, Reactor Coolant System (RCS) Intact," is revised as follows: • Condition C is revised from "*Presence of noncondensible gases in the high point vent*," to "**PRHR HX inlet line noncondensible gas volume not within limit**." • Required Action C.1 is revised from "Vent *noncondensible gases*," to "**Restore PRHR HX inlet line noncondensible gas volume to within limit**." See discussion of DOC L17 Item 1 for justification of the proposed changes.	L-4	CTS / ITS 3.5.5 • Condition C • Required Action C.1
	4. Current TS 3.5.6, "In-containment Refueling Water Storage Tank (IRWST) – Operating," is revised as follows: • Condition B is revised from "One IRWST injection *line inoperable due to presence of noncondensible gases in one high point vent*," to "One IRWST injection **flow path with noncondensible gas volume in one squib valve outlet line pipe stub not within limit**." • Required Action B.1 is revised from "*Vent noncondensible gases*," to "**Restore noncondensible gas volume in squib valve outlet line pipe stub to within limit**." • Condition C is revised from "One IRWST injection *line inoperable due to presence of noncondensible gases in both high point vents*," to "One IRWST injection **flow path with noncondensible gas volume in both squib valve outlet line pipe stubs not within limit**." • Required Action C.1 is revised from "*Vent noncondensible gases from one high point vent*," to "**Restore noncondensible gas volume in one squib valve outlet line pipe stub to within limit**." See discussion of DOC L17 Item 1 for justification of the proposed changes.	L-4	CTS / ITS 3.5.6 • Condition B • Required Action B.1 • Condition C • Required Action C.1

Table L
Less 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
L17 (cont'd)	5. Current TS 3.5.7, "In-containment Refueling Water Storage Tank (IRWST) – Shutdown, MODE 5," is revised as follows: • Condition B is revised from "Required IRWST injection *line inoperable due to presence of noncondensible gases in one high point vent*," to "Required IRWST injection **flow path with noncondensible gas volume in one squib valve outlet line pipe stub not within limit**." • Required Action B.1 is revised from "*Vent noncondensible gases*," to "**Restore noncondensible gas volume in squib valve outlet line pipe stub to within limit**." • Condition C is revised from "Required IRWST injection *line inoperable due to presence of noncondensible gases in both high point vents*," to "**Required IRWST injection flow path with noncondensible gas volume in both squib valve outlet line pipe stubs not within limit**." • Required Action C.1 is revised from "*Vent noncondensible gases from one high point vent*," to "**Restore noncondensible gas volume in one squib valve outlet line pipe stub to within limit**." See discussion of DOC L17 Item 1 for justification of the proposed changes.	L-4	TS 3.5.7 • Condition B • Required Action B.1 • Condition C • Required Action C.1
	6. Current TS 3.5.8, "In-containment Refueling Water Storage Tank (IRWST) – Shutdown, MODE 6," is revised as follows: • Condition B is revised from "Required IRWST injection *line inoperable due to presence of noncondensible gases in one high point vent*," to "Required IRWST injection **flow path with noncondensible gas volume in one squib valve outlet line pipe stub not within limit**." • Required Action B.1 is revised from "*Vent noncondensible gases*," to "**Restore noncondensible gas volume in squib valve outlet line pipe stub to within limit**." • Condition C is revised from "Required IRWST injection *line inoperable due to presence of noncondensible gases in both high point vents*," to "Required IRWST injection **flow path with noncondensible gas volume in both squib valve outlet line pipe stubs not within limit**." • Required Action C.1 is revised from "*Vent noncondensible gases from one high point vent*," to "**Restore one squib valve outlet line pipe stub noncondensible gas volume to within limit**." See discussion of DOC L17 Item 1 for justification of the proposed changes.	L-4	TS 3.5.8 • Condition B • Required Action B.1 • Condition C • Required Action C.1

Types of Less Restrictive Changes in TS Section 3.5:

L-4 Relaxation of Required Action

L-7 Replacement of SR with Equivalent Requirement

DOC No.	TS Section 3.6 - Containment Systems **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L14 (cont'd)	2. Note that CTS 3.6.6 and CTS 3.6.7 are combined as described in DOC M13. Current TS 3.6.7, "Passive Containment Cooling System (PCS) – Shutdown," Applicability is revised from "MODE 5 with the calculated reactor decay heat > 6.0 MWt, MODE 6 with the calculated reactor decay heat > 6.0 MWt," to "MODES 5 and 6 with the reactor decay heat > 6.0 MWt." The affected specification ensures that the appropriate structures, systems, and components are Operable and that the appropriate testing is performed when reactor decay heat or fuel storage pool decay heat are above specified values, as applicable. The use of "calculated" is a method of determination that is not required to be included in the TS to properly interpret the applicability requirement. This change is consistent with how decay heat is used to modify requirements stated in TS Table 1.1-1, "MODES," Footnote a. This change is less restrictive because it removes a specific method of how the decay heat is determined to meet LCO requirements.	L-2	CTS 3.6.7 • Applicability --- ITS 3.6.6 • Applicability
L18 (cont'd)	2. Current TS 3.6.8, "Containment Penetrations," LCO 3.6.8.d is revised from "… either: 1. closed by a manual or automatic isolation valve, blind flange, or equivalent, or 2. capable of being closed by an OPERABLE Containment Isolation signal." to "… **if open, can be** closed by a manual or automatic isolation valve, blind flange, or equivalent **prior to steaming into the containment**." Current TS LCO 3.6.8.d provides the requirements for each penetration providing direct access from the containment atmosphere to the outside atmosphere. The penetrations covered by this LCO requirement are those providing direct access to the outside atmosphere, which includes the containment air filter supply and exhaust penetrations, and the vent and purge valves and the vacuum relief valves. For postulated shutdown events in MODES 5 and 6, RCS heat removal is provided by either passive residual heat removal (PRHR) or IRWST injection and containment sump recirculation. To support RCS heat removal, containment closure is required to limit the loss of the cooling water inventory from containment. The only Containment Isolation Signals required by current TS 3.3.2 in MODES 5 and 6 are the manual initiation functions. There are no automatic isolation functions required. Thus, LCO 3.6.8.d.2 is currently requiring the associated valves to be capable of closing from a Manual signal only. Current LCO 3.6.8.a, b, and c provide the requirements for the equipment hatches, air locks doors, and containment spare penetrations. All three of these requirements allow the associated (continued)	L-1	CTS 3.6.8 • LCO --- ITS 3.6.7 • LCO (continued)

DOC No.	TS Section 3.6 - Containment Systems **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L18 (cont'd)	2. (continued) penetration to be open, provided that it is capable of being closed prior to steaming into the containment. This capability is not reliant on any remote closure signals or automatic features. The equipment hatches and personnel air locks have openings that are much larger than the containment air filter supply and exhaust penetrations, which are only 36 inch penetrations. Closing these larger penetrations may involve more protracted procedures to affect manual closure than would be for the containment air filter supply and exhaust penetrations. Therefore, it is reasonable to allow the purge valve penetrations to be open, provided they can be closed prior to steaming into the containment. This allows all major penetration flow paths to be controlled in a similar manner. This change is less restrictive since the proposed LCO omits requirements for OPERABLE containment isolation signals in Modes 5 and 6, allowing manual operator action to affect any required isolation.	L-1	CTS 3.6.8 • LCO --- ITS 3.6.7 • LCO
	3. Current SR 3.6.8.3 is deleted to be consistent with the proposed scope change to LCO 3.6.8.d. This portion of the proposed changes is administrative.	L-1	CTS 3.6.8 • SR 3.6.8.3 --- ITS 3.6.7
L19	1. In current TS 3.6.9, LCO 3.6.9 and SR 3.6.9.1, the trisodium phosphate (TSP) requirement is changed from the volume requirement of 560 ft^3 to a weight requirement of 26,460 lbs. Current TS LCO 3.6.9 requires the pH adjustment baskets to contain ≥ 560 ft^3 of TSP. Current SR 3.6.9.1 requires verification of this volume (560 ft^3) every 24 months. The pH adjustment baskets are part of the Passive Containment Cooling System (PXS), and are provided to adjust the pH of the water in containment following an accident where the containment floods. Following an accident with a large release of radioactivity, the containment pH is automatically adjusted to ≥ 7.0 to enhance iodine retention in the containment water. The desired pH value significantly reduces formation of elemental iodine and the total airborne iodine in the containment. The dodecahydrate form of TSP contained in the pH adjustment baskets provides the passive means of pH control for such accidents. The amount of TSP needed to perform this pH adjustment is 26,460 lbs, as is specified in the Final Safety Analysis Report ~~(~~FSAR~~)~~, Section 6.3.2.2.4. This is the total weight of the TSP assumed in the accident analysis to adjust the pH to at least 7.0. The current value is in volume since the weight cannot be readily measured during operation. However, the conversion from weight to volume is more appropriately controlled in the Surveillance procedure that performs current SR 3.6.9.1. Specifically, since volume will decrease over time (i.e., density of TSP may increase after installation due to compaction and agglomeration from humidity inside the containment), the more appropriate parameter to establish the LCO requirement against is weight. (continued)	L-1	CTS 3.6.9 • LCO • SR 3.6.9.1 --- ITS 3.6.8 • LCO • SR 3.6.8.1 (continued)

Table L
Less 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
L19 (cont'd)	1. (continued) The currently specified volume of 560 ft^3 will decrease later in the cycle. The intent of the 560 ft^3 (which includes approximately 10% additional margin) is to establish the pre-compaction and pre-agglomeration volume and not to establish the OPERABILITY criteria for later in cycle. The TS bases discusses that the initial loading of TSP includes this 10% volume margin and that the required loading volume prior to compaction and agglomeration is ≥ 560 ft^3. The procedure can readily account for the conversion from volume to weight, and thus the LCO requirement can match the actual analysis units, which is in lbs. Agglomeration does not affect the weight of the TSP, only the volume. The proposed change ensures that the minimum weight required by the FSAR is maintained. In addition, the Surveillance procedure can adequately control the actual volume necessary to meet the weight requirement, similar to other Surveillances whose measured values must be adjusted to ensure the actual LCO limit is met. In addition, the TS bases describes that the TSP volume is normally monitored to ensure the weight limit is met, and that the monitored volume includes necessary corrections for possible compaction and agglomeration effects. This change is designated as less restrictive since the proposed LCO will allow for a lesser volume over time consistent with expected compaction and agglomeration. While the total weight will remain constant and sufficient to assure safety analysis assumptions are met, the unintended requirement to maintain volume ≥ 560 ft^3, even after compaction and agglomeration, is made less restrictive	L-1	CTS 3.6.9 • LCO • SR 3.6.9.1 --- ITS 3.6.8 • LCO • SR 3.6.8.1
	2. In addition, due to this change, Condition A and Required Action A.1 are changed to refer to "weight" in lieu of "volume." This portion of the proposed changes is administrative.	L-1	CTS 3.6.9 • Condition A • Required Action A.1 --- ITS 3.6.8 • Condition A • Required Action A.1
L01 (cont'd)	Current TS 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," SR 3.3.2.7 ("Perform ACTUATION DEVICE TEST") and SR 3.3.2.8 ("Perform ACTUATION DEVICE TEST for squib valves") are deleted from current TS 3.3.2 and Table 3.3.2-1, Function 26.a, ESF Actuation Subsystem. The equivalent requirement (using phrasing generally consistent with NUREG-1431) is included in individual Specifications for the actuated devices with the same 24 month Frequency as the deleted SRs. The following is the SR being added in TS Section 3.6: 17. A new SR is added to current TS 3.6.10, "Vacuum Relief Valves," stating: "Verify each vacuum relief valve actuates to relieve vacuum on an actual or simulated actuation signal." This SR is numbered SR 3.6.9.3, because current TS 3.6.10, "Vacuum Relief Valves," was renumbered as TS 3.6.9 as discussed in DOC M13.	L-7	CTS 3.3.2 • SR 3.3.2.7 --- ITS 3.6.9 • SR 3.6.9.3

Table L
Less 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 Less Restrictive Changes in TS Section 3.6:			
L-1	Relaxation of LCO Requirement		
L-7	Replacement of SR with Equivalent Requirement		

Table L
Less 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
L20	1. Current TS 3.7.2, "Main Steam Isolation Valves (MSIVs)," Condition D is modified by a Note that states "Separate Condition entry is allowed for each MSIV." The term "MSIV" is changed to "main steam line flow path." CTS LCO 3.7.2 requires various main steam line flow path isolation valves to be Operable. Included in these valves are not only the MSIVs, but also the turbine stop valves, turbine control valves, turbine bypass valves, and moisture separator reheater 2nd stage steam isolation valves. ACTION D provides the actions to be taken when these valves are inoperable in MODE 2, 3, or 4. Required Action D.1 requires the associated flow path to be isolated and Required Action D.2 requires a periodic verification that the flow path remains in this condition. The current Note to Condition D only states that inoperable MSIVs have a separate Condition entry allowance. However, the Condition applies to all valves required by the LCO, not just the MSIVs. The manner in which the Note is written does not allow Required Actions D.1 and D.2 to be taken for each affected flow path associated with any valves other than the MSIVs. For example, if a turbine stop valve is inoperable and Required Action D.1 initially complied with (i.e., the affected flow path is isolated), if a second valve in another flow path (e.g., a turbine bypass valve) becomes inoperable, there is no allowed time to perform Required Action D.1 on this new affected flow path; the Required Action is immediately not met and Condition E must be entered. The proposed Note will allow separate Condition entry for each main steam line flow path. Required Action D.1 adequately compensates for the inoperability of each valve, since it requires the affected flow path to be isolated. This places the valve in the assumed post accident position. Required Action D.2 requires a periodic verification that the flow path remains isolated. Once isolated, the appropriate compensatory action is in place. Subsequent flow paths with inoperable valves are justified to be allowed appropriate Completion Times to isolate the affected flow path prior to requiring a unit shutdown in accordance with Action E. Providing this allowance minimizes the plant risk associated with imposing an unnecessary shutdown. This change is designated as less restrictive since the proposed Condition D Note allows separate Condition entry for more inoperable valves than currently allowed.	L-4	CTS / ITS 3.7.2 • Condition D Note
L05 (cont'd)	3. Current TS LCO 3.0.8 is eliminated. LCO 3.0.8 applies in MODES 5 and 6 when the associated ACTIONS are not met or an associated ACTION is not provided. In some case, LCO 3.0.8 is explicitly excluded from being applied by way of a Note. In conjunction with the change to eliminate LCO 3.0.8, these Notes are no longer necessary and are administratively eliminated. Current TS 3.7.5, Spent Fuel Pool Water Level, ACTIONS Note ("LCO 3.0.8 is not applicable.") is deleted.	L-9	TS 3.7.5 • ACTIONS Note ---------- ITS 3.7.5 • ACTIONS

Table L
Less 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
L05 (cont'd)	4. Current TS 3.7.6, Main Control Room Habitability System (VES), ACTIONS Note ("LCO 3.0.8 is not applicable.") is deleted.	L-9	TS 3.7.6 • ACTIONS Note --- ITS 3.7.6 • ACTIONS
	5. Current TS 3.7.9, Fuel Storage Pool Makeup Water Sources, Required Action A.1 Note ("LCO 3.0.8 is not applicable.") is deleted.	L-9	CTS 3.7.9 • Required Action A.1 Note --- ITS 3.7.9 • Required Action A.1
	6. Current TS 3.7.11, Fuel Storage Pool Boron Concentration, ACTIONS Note ("LCO 3.0.8 is not applicable.") is deleted.	L-9	CTS 3.7.11 • ACTIONS Note --- ITS 3.7.11 • ACTIONS
	7. Current TS 3.7.12, Spent Fuel Pool Storage, ACTIONS Note ("LCO 3.0.8 is not applicable.") is deleted.	L-9	CTS 3.7.12 • ACTIONS Note --- ITS 3.7.12 • ACTIONS
L01 (cont'd)	18. Current TS 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," SR 3.3.2.7 ("Perform ACTUATION DEVICE TEST") and SR 3.3.2.8 ("Perform ACTUATION DEVICE TEST for squib valves") are deleted from current TS 3.3.2 and Table 3.3.2-1, Function 26.a, ESF Actuation Subsystem. The equivalent requirement (using phrasing generally consistent with NUREG-1431) is included in individual Specifications for the actuated devices with the same 24 month Frequency as the deleted SRs. New SR 3.7.7.2 is added to TS 3.7.7, "Startup Feedwater Isolation and Control Valves," stating: "Verify each startup feedwater isolation and control valve actuates to the isolation position on an actual or simulated actuation signal. | 24 months"	L-7	CTS 3.3.2 Function 26.a • SR 3.3.2.7 --- ITS 3.3.15 ITS 3.7.7 • SR 3.7.7.2
	19. New SR 3.7.10.3 is added to TS 3.7.10, "Steam Generator (SG) Isolation Valves," stating "Verify each SG PORV, PORV block valve, and SG blowdown isolation valve actuates to the isolation position on an actual or simulated actuation signal. | 24 months"	L-7	CTS 3.3.2 Function 26.a • SR 3.3.2.7 --- ITS 3.3.15 ITS 3.7.10 • SR 3.7.10.3

Table L
Less 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
L14 (cont'd)	3. Current TS 3.7.9, "Fuel Storage Pool Makeup Water Sources," LCO Notes 1, 2, and 3; Applicability, SR 3.7.9.1 Note, SR 3.7.9.2 Note, SR 3.7.9.3 Note, and SR 3.7.9.4 Note are revised by deleting "calculated" with respect to decay heat. The affected specification ensures that the appropriate structures, systems, and components are OPERABLE and that the appropriate testing is performed when reactor decay heat or fuel storage pool decay heat are above specified values, as applicable. The use of "calculated" is a method of determination that is not required to be included in the TS to properly interpret the applicability requirement. This change is consistent with how decay heat is used to modify requirements stated in TS Table 1.1-1, "MODES," footnote a. This change is less restrictive because it removes a specific method of how the decay heat is determined to meet LCO, action, and surveillance requirements.	L-2	CTS / ITS 3.7.9 • LCO Notes1, 2, and 3 • Applicability • SR 3.7.9.1 Note • SR 3.7.9.2 Note • SR 3.7.9.3 Note • SR 3.7.9.4 Note

Types of Less Restrictive Changes in TS Section 3.7:

- L-2 Relaxation of Applicability Requirement
- L-4 Relaxation of Required Action
- L-7 Replacement of SR with Equivalent Requirement
- L-9 Deletion of LCO 3.0.8

Table L
Less Restrictive Changes

DOC No.	TS Section 3.8 - Electrical Power Systems **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L21	1. Current TS 3.8.1, "DC Sources – Operating," is revised to delete SR 3.8.1.3 Note 2. SR 3.8.1.3 Note 2 states, "This Surveillance shall not normally be performed in MODE 1, 2, 3, or 4 unless the spare battery is connected to replace the battery being tested. However, portions of the Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced." As stated in the SR 3.8.1.3 bases, the "reason for Note 2 is that performing the Surveillance would perturb the electrical distribution system and challenge safety systems if the spare battery is not connected." The DC electrical power design includes four Class 1E DC electrical power subsystems each with battery banks and chargers. In addition, there is one installed spare battery and one installed spare battery charger, which provides backup service in the event that one of the battery banks and/or one of the preferred battery chargers is out of service. The spare battery bank and charger are Class 1E and have the same rating as the primary components. If the spare battery bank with the charger is substituted for one of the preferred battery banks or chargers, then the requirements of independence and redundancy between subsystems are maintained and the division is OPERABLE. A spare battery bank and charger enables testing, maintenance, and equalization of battery banks offline. This configuration provides the capability for each battery bank or battery charger to be separately tested and maintained (including battery discharge tests, battery cell replacement, battery charger replacement) without limiting continuous plant operation at 100-percent power. The service test required by SR 3.8.1.3 and SR 3.8.7.6 would be performed on batteries only after they have been replaced with the spare. In this condition, the battery being tested is not connected to the electrical distribution system. Final Safety Analysis Report ~~(~~FSAR~~)~~ 17.6 incorporates by reference NEI 07-02A, "Generic FSAR Template Guidance for Maintenance Rule Program Description for Plants Licensed Under 10 CFR Part 52," which requires procedures for maintenance risk assessment and management in accordance with 10 CFR 50.65(a)(4). The risk from maintenance activities is both assessed (i.e., using a risk-informed process to evaluate the overall contribution to risk of the planned maintenance activities) and managed (i.e., providing plant personnel with proper awareness of the risk, and taking actions as appropriate to control the risk). Therefore, battery service testing would not be performed when the TS require its OPERABILITY. Current TS bases for SR 3.8.1.3 include the acknowledgement that the service test may be performed during any plant condition with the spare battery and charger providing power to the bus. During performance of this SR, the spare battery would replace the battery being tested. Therefore, performance of this SR would not perturb the electrical distribution system and challenge safety systems. As such, the scope and intent of SR 3.8.1.3 Note 2 is not required. For consistency, TS bases for SR 3.8.7.6 are being revised to reflect similar information regarding utilizing the spare battery. During performance of this SR, the (continued)	L-5	CTS 3.8.1 • SR 3.8.1.3 Note 2 --- ITS 3.8.1 • SR 3.8.1.3 (continued)

DOC No.	TS Section 3.8 - Electrical Power Systems **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L21 (cont'd)	1. (continued) spare battery would replace the battery being tested. Therefore, performance of SR 3.8.7.6 would not perturb the electrical distribution system and challenge safety systems. As such, the scope and intent of the SR 3.8.7.6 Note is not required. This change is designated as less restrictive because a limitation for SR testing is deleted.	L-5	CTS 3.8.1 • SR 3.8.1.3 Note 2 --- ITS 3.8.1 • SR 3.8.1.3
	2. Current TS 3.8.7, "Battery Parameters," is revised to delete the SR 3.8.7.6 Note. The SR 3.8.7.6 Note states, "This Surveillance shall not be performed in MODE 1, 2, 3, or 4. However, credit may be taken for unplanned events that satisfy this SR." Per the SR 3.8.7.6 bases, the "reason for the Note is that performing the Surveillance would perturb the electrical distribution system and challenge safety systems." See discussion of DOC L21 Item 1 for justification of the proposed change.	L-5	CTS 3.8.7 • SR 3.8.7.6 Note --- ITS 3.8.7 • SR 3.8.7.6
L22	1. Current TS 3.8.2, "DC Sources – Shutdown," is revised to add a new ACTION A to address inoperable battery charger(s), resulting in the renumbering of the subsequent Conditions and Required Actions. The new ACTION A consists of the following: Condition A One or more required battery chargers in one division inoperable. Required Action A.1 Restore battery terminal voltage to greater than or equal to the minimum established float voltage. | 6 hours AND Required Action A.2: Verify battery float current ≤ 2 amps. | Once per 24 hours AND Required Action A.3: Restore battery charger(s) to OPERABLE status. | 72 hours. Current TS Required Actions for an inoperable battery charger are the same as for an inoperable battery or a completely deenergized DC electrical power subsystem, which requires immediate actions in accordance with current ACTION A. New ACTION A and associated Required Actions A.1, A.2, and A.3 address the condition where one or more battery charger(s) for any one DC electrical power division becomes inoperable. Note that the proposed new ACTION A is the same as specified by CTS 3.8.1, "DC Sources – Operating," Condition A, Required Actions A.1, A.2 and A.3 and their associated Completion Times. The proposed Required Action A.3 for ITS 3.8.2 provides a 72-hour restoration time for inoperable battery charger(s) in one division. This time is contingent on a focused and tiered approach to assuring adequate battery capability is maintained. Upon entering new Condition A, the first priority is to minimize the battery discharge. Required Action A.1 assures the discharge is terminated by requiring that the battery terminal voltage be restored to greater than or equal to the minimum established float voltage within 6 hours. (continued)	L-4	CTS 3.8.2 • ACTIONS --- ITS 3.8.2 • ACTIONS (continued)

DOC No.	TS Section 3.8 - Electrical Power Systems **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L22 (cont'd)	1. (continued) The second tier action (Required Action A.2) requires that within 24-hours (and continuing at 24-hour intervals thereafter) that verification is made that the battery has sufficient capacity to perform its assumed duty cycle. The 24 hours is provided because, in order to complete this capacity verification, there may be a need for some recharging to recover any lost capacity that occurred during the initial 2 hours without a battery charger supplying the battery. This provides a reasonable time to fully recharge the battery. Given that the DC buses remain energized (as required by current TS 3.8.6, "Distribution Systems – Shutdown,"), the battery discharge (if it was occurring) is terminated by Required Action A.1, and that the battery is fully recharged by Required Action A.2, there is a reasonable basis for extending the restoration time for an inoperable battery charger to 72 hours. This change is less restrictive because it extends the restoration time for an inoperable charger to 72 hours. The proposed TS changes are also consistent with the STS.	L-4	CTS 3.8.2 • ACTIONS --- ITS 3.8.2 • ACTION A
L03 (cont'd)	2. Current TS are revised to eliminate the use of the defined term "CORE ALTERATION" and incorporate changes reflected in TSTF-417-A, "Eliminate use of term CORE ALTERATIONS in ACTIONS and Notes," Revision 1. As a result of deleting the defined term, CORE ALTERATIONS, the Required Action which states "Suspend CORE ALTERATIONS immediately" in various Specifications in TS Section 3.8 is also deleted. CTS 3.8.2, "DC Sources – Shutdown," Required Action A.2.1 ("Suspend CORE ALTERATIONS. | Immediately") is deleted, which results in renumbering the subsequent Required Actions (under improved TS 3.8.2 Condition B; see DOC L22).	L-10	CTS 3.8.2 • Required Action A.2.1 • Required Actions A.2.2, A.2.3, A.2.4 and A.2.5 --- ITS 3.8.2 • Required Actions B.2.1, B.2.2, B.2.3 and B.2.4
	3. Current TS 3.8.4, "Inverters – Shutdown," Required Action A.2.1 ("Suspend CORE ALTERATIONS. | Immediately") is deleted, which results in renumbering the subsequent Required Actions.	L-10	CTS 3.8.4 • Required Action A.2.1 • Required Actions A.2.2, A.2.3, A.2.4 and A.2.5 --- ITS 3.8.4 • Required Actions A.2.1, A.2.2, A.2.3 and A.2.4

Table L
Less Restrictive Changes

DOC No.	TS Section 3.8 - Electrical Power Systems **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L03 (cont'd)	4. Current TS 3.8.6, "Distribution Systems – Shutdown," Required Action A.2.1 ("Suspend CORE ALTERATIONS. | Immediately") is deleted, which results in renumbering the subsequent Required Actions.	L-10	CTS 3.8.6 • Required Action A.2.1 • Required Actions A.2.2, A.2.3, A.2.4 and A.2.5 --- ITS 3.8.6 • Required Actions A.2.1, A.2.2, A.2.3 and A.2.4
L04 (cont'd)	2. The second Completion Times associated with current TS 3.8.5, "Distribution Systems – Operating," Required Actions A.1 and B.1 ("12 hours from discovery of failure to meet the LCO"), and Required Actions C.1 and D.1 ("16 hours from discovery of failure to meet the LCO") are deleted. This change incorporates changes reflected in TSTF-439-A, "Eliminate Second Completion Times Limiting Time From Discovery of Failure To Meet an LCO," Revision 2. (See TS Section 1.0 for the other L04 change.)	L-3	TS 3.8.5 • Required Action A.1 • Required Action B.1 • Required Action C.1 • Required Action D.1

Types of Less Restrictive Changes in TS Section 3.8:

L-3 Relaxation of Completion Time

L-4 Relaxation of Required Action

L-5 Relaxation of SR Testing Conditions

L-10 Deletion of Definition of CORE ALTERATIONS

Table L
Less Restrictive Changes

DOC No.	TS Section 3.9 - Refueling Operations **Description of Change** (change numbers added for reference)	Change Type	Affected TS Section and Requirements
L03 (cont'd)	5. Current TS are revised to eliminate the use of the defined term "CORE ALTERATION" and incorporates changes reflected in TSTF-471-A, "Eliminate use of term CORE ALTERATIONS in ACTIONS and Notes," Revision 1. Current TS 3.9.1, "Boron Concentration": Required Action A.1, which states "Suspend CORE ALTERATIONS", is deleted, resulting in the renumbering of the subsequent Required Actions.	L-10	CTS 3.9.1 • Required Action A.1 • Required Actions A.2 and A.3 --- ITS 3.9.1 • Required Actions A.1 and A.2
	6. Current TS 3.9.2, "Unborated Water Source Flow Paths": Required Action A.1, which states "Suspend CORE ALTERATIONS", is deleted, resulting in the renumbering of the subsequent Required Actions.	L-10	CTS 3.9.2 Required Action A.1 Required Actions A.2 and A.3 --- ITS 3.9.2 • Required Actions A.1 and A.2
	7. Current TS 3.9.3, "Nuclear Instrumentation": Required Action A.1, which states "Suspend CORE ALTERATIONS", is modified to replace "CORE ALTERATIONS" with "positive reactivity additions."	L-10	CTS / ITS 3.9.3 • Required Action A.1
L05 (cont'd)	8. Current TS LCO 3.0.8 is eliminated. LCO 3.0.8 applies in MODES 5 and 6 when the associated ACTIONS are not met or an associated ACTION is not provided. In some cases, LCO 3.0.8 is explicitly excluded from being applied by way of a Note. In conjunction with the change to eliminate LCO 3.0.8, these Notes are no longer necessary and are eliminated. Current TS 3.9.4, "Refueling Cavity Water Level," ACTIONS table Note ("LCO 3.0.8 is not applicable.") is deleted.	L-9	CTS 3.9.4 • ACTIONS Note --- ITS 3.9.4 • ACTIONS
	9. Current TS 3.9.7, "Decay Time," ACTIONS table Note ("LCO 3.0.8 is not applicable.") is deleted. (This specification subsection is renumbered as ITS 3.9.5, as discussed in DOCs R1 and R2).	L-9	CTS 3.9.7 • ACTIONS Note --- ITS 3.9.5 • ACTIONS

Types of Less Restrictive Changes in TS Section 3.9

L-9 Deletion of LCO 3.0.8

L-10 Deletion of Definition of CORE ALTERATIONS

Table L
Less Restrictive Changes

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 numbers added for reference)	Change Type	Affected TS Section and Requirements
L02	2. Current TS 5.6, “Reporting Requirements," is revised to delete TS 5.6.1, “Occupational Radiation Exposure Report,” and TS 5.6.4, “Monthly Operating Reports.” These changes result in the renumbering of TS 5.6 sections, but do not revise technical or administrative requirements. The changes are consistent with TSTF-369-A, “Removal of Monthly Operating Report and Occupational Radiation Exposure Report,” Revision 1. The availability of this TS improvement was announced in the Federal Register on June 23, 2004 (69 FR 35067) as part of the Consolidated Line Item Improvement Process (CLIIP).	L-8	CTS 5.6.1 CTS 5.6.4 CTS 5.6.2, 5.6.3, 5.6.5, 5.6.6 ---------- ITS 5.6.1, 5.6.2, 5.6.3, 5.6.4
L23	1. Current TS 5.5.2, "Radioactive Effluent Control Program," is revised to state that the provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluent Controls Program surveillance frequency. This change incorporates changes reflected in TSTF-258-A, “Changes to Section 5.0, Administrative Controls,” Revision 4.	L-6	CTS / ITS 5.5.2
L24	1. Current TS 5.5.3, "Inservice Testing Program," paragraph b is revised from "The provisions of SR 3.0.2 are applicable to the above required Frequencies for performing inservice testing activities," to "The provisions of SR 3.0.2 are applicable to the above required Frequencies **and other normal and accelerated Frequencies specified as 2 years or less in the Inservice Testing Program** for performing inservice testing activities." This change incorporates changes reflected in TSTF-497-A, “Limit Inservice Testing Program SR 3.0.2 Application to Frequencies of 2 Years or Less,” Revision 0.	L-6	CTS / ITS 5.5.3
Types of Less Restrictive Changes in TS Section 5.0: L-6 Relaxation of SR Frequency L-8 Deletion of Reporting Requirements			