UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

DRAFT
July 13, 1999

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. ___ TO FACILITY OPERATING LICENSE DPR-20

PALISADES PLANT

CONSUMERS ENERGY COMPANY

DOCKET NO. 50-255

I. INTRODUCTION

Palisades Plant has been operating with Technical Specifications (TS) issued with the original operating license on March 24, 1971, as amended from time to time. By letter dated January 26, 1998, as supplemented by letters dated April 30, September 14, October 12, and November 9, 1998, and March 1, March 22, March 30, April 7, May 3, June 4, June 11, and June 17, 1999, Consumers Energy Company (the licensee) proposed to amend Appendix A of Operating License No. DPR-20 to completely revise the Palisades TS. The proposed amendment was based upon NUREG-1432, "Standard Technical Specifications for Combustion Engineering Plants," Revision 1, dated April 1995, and upon guidance in the "NRC Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (Final Policy Statement), published on July 22, 1993 (58 FR 39132), and 10 CFR 50.36, as amended July 19, 1995 (60 FR 36953). The overall objective of the proposed amendment, consistent with the Final Policy Statement, was to rewrite, reformat, and streamline completely the existing TS for Palisades.

Hereinafter, the proposed TS are referred to as the improved TS (ITS), the existing Palisades TS are referred to as the current TS (CTS), and the TS in NUREG-1432 are referred to as the standard TS (STS). The corresponding TS Bases are ITS Bases, CTS Bases, and STS Bases, respectively.

In addition to basing ITS on STS, the Final Policy Statement, and 10 CFR 50.36, the licensee retained portions of the CTS as a basis for the ITS. Plant-specific issues, including design features, requirements, and operating practices, were discussed with the licensee during a series of conference calls and meetings that concluded on _____ __, 1999. Based on these discussions, the licensee proposed matters of a generic nature that were not in STS. The NRC staff requested that the licensee submit such generic issues as a proposed change to STS through the Nuclear Energy Institute's Technical Specifications Task Force (TSTF). These generic issues were considered for specific applications in the Palisades ITS. Consistent with the Final Policy Statement, the licensee proposed transferring some CTS requirements to licensee-controlled documents. In addition, human factors principles were

emphasized to add clarity to the CTS requirements being retained in the ITS and to define more clearly the appropriate scope of the ITS. Further, significant changes were proposed to the CTS Bases to make each ITS requirement clearer and easier to understand.

The Commission's proposed action on the Palisades application for an amendment dated January 26, 1998, was published in the *Federal Register* on _____ __, 1999 (__ FR _____). The Staff's evaluation of the application, including supplements to the licensee's ITS proposal, submitted by letters dated, September 14, October 12, and November 9, 1998, and March 1, March 22, March 30, April 7, May 3, June 4, June 11, and June 17, 1999, that resulted from NRC requests for information and discussions with the licensee during the NRC staff review, is presented in this Safety Evaluation (SE). These plant-specific changes serve to clarify the ITS with respect to the guidance in the Final Policy Statement and STS. Therefore, the changes are within the scope of the action described in the *Federal Register* notice.

In addition, since the application for an amendment was published, the following Palisades amendments have been approved: Technical Specification Amendment Nos. 179, Containment Systems Technical Specifications; 180, Electrical Power Systems; 181 Administrative Controls,182, Primary Coolant Pump Flywheel Inspection Technical Specifications; 183, Auxiliary Feedwater System Technical Specifications; 184, Containment Systems Technical Specifications; 185, Deletion of Snubber Technical Specification Requirements, and 186, Control Room Ventilation System Technical Specifications. The licensee has incorporated these amendments as appropriate ITS specifications into the ITS. The NRC staff finds these ITS specifications acceptable.

During ITS review, the NRC staff relied on the Final Policy Statement and the STS as guidance for acceptance of CTS changes. This SE provides a summary basis for the NRC staff conclusion that Palisades can develop ITS based on STS, as modified by plant-specific changes, and that the use of the ITS is acceptable for continued operation. The NRC staff also acknowledges that, as indicated in the Final Policy Statement, the conversion to STS is a voluntary process. Therefore, it is acceptable that the ITS differs from STS, reflecting the current licensing basis. The NRC staff approves the licensee's changes to the CTS with modifications documented in the revised submittals.

For the reasons stated *infra* in this SE, the NRC staff finds that the TS issued with this license amendment comply with Section 182a of the Atomic Energy Act, 10 CFR 50.36, and the guidance in the Final Policy Statement, and that they are in accord with the common defense and security and provide adequate protection of the health and safety of the public.

II. BACKGROUND

Section 182a of the Atomic Energy Act requires that applicants for nuclear power plant operating licenses will state:

> [S]uch technical specifications, including information of the amount, kind, and source of special nuclear material required, the place of the use, the specific characteristics of the facility, and such other information as the Commission may, by rule or regulation, deem necessary in order to enable it to find that the utilization . . . of special nuclear material will be in accord with the common defense and security and will provide adequate protection to the health and safety of the public. Such technical specifications shall be a part of any license issued.

In 10 CFR 50.36, the Commission established ITS regulatory requirements related to the content of TS. In doing so, the Commission placed emphasis on those matters related to the prevention of accidents and the mitigation of accident consequences; the Commission noted that applicants were expected to incorporate into their TS "those items that are directly related to maintaining the integrity of the physical barriers designed to contain radioactivity." Statement of Consideration, "Technical Specifications for Facility Licenses; Safety Analysis Reports," 33 FR 18610 (December 17, 1968). Pursuant to 10 CFR 50.36, TS are required to include items in the following five specific categories: (1) safety limits, limiting safety system settings and limiting control settings; (2) limiting conditions for operation (LCOS); (3) surveillance requirements (SR); (4) design features; and (5) administrative controls. However, the rule does not specify the particular requirements to be included in a plant's TS.

For several years, NRC and industry representatives have sought to develop guidelines for improving the content and quality of nuclear power plant TS. On February 6, 1987, the Commission issued an interim policy statement on TS improvements, "Interim Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (52 FR 3788). During the period from 1989 to 1992, the utility Owners Groups and the NRC staff developed improved standard technical specifications that would establish models of the Commission's policy for each primary reactor type. In addition, the NRC staff, licensees, and Owners Groups developed generic administrative and editorial guidelines in the form of a "Writer's Guide" for preparing technical specifications, which gives greater consideration to human factors principles and was used throughout the development of licensee-specific ITS.

In September 1992, the Commission issued NUREG-1432, which was developed using the guidance and criteria contained in the Commission's interim policy statement. STS were established as a model for developing improved TS for Combustion Engineering plants in general. STS reflect the results of a detailed review of the application of the interim policy statement criteria to generic system functions, which were published in a "Split Report"

issued to the Nuclear Steam System Supplier (NSSS) Owners Groups in May 1988. STS also reflect the results of extensive discussions concerning various drafts of STS, so that the application of the TS criteria and the Writer's Guide would consistently reflect detailed system configurations and operating characteristics for all NSSS designs. As such, the generic Bases presented in NUREG-1432 provide an abundance of information regarding the extent to which the STS present requirements that are necessary to protect public health and safety.

On July 22, 1993, the Commission issued ITS Final Policy Statement, expressing the view that satisfying the guidance in the policy statement also satisfies Section 182a of the Act and 10 CFR 50.36 (58 FR 39132). The Final Policy Statement described the safety benefits of the improved STS, and encouraged licensees to use the improved STS as the basis for plant-specific TS amendments, and for complete conversions to improved STS. Further, the Final Policy Statement gave guidance for evaluating the required scope of the TS and defined the guidance criteria to be used in determining which of the LCOS and associated surveillances should remain in the TS. The Commission noted that, in allowing certain items to be relocated to licensee-controlled documents while requiring that other items be retained in the TS, it was adopting the qualitative standard enunciated by the Atomic Safety and Licensing Appeal Board in *Portland General Electric Co.* (Trojan Nuclear Plant), ALAB-531, 9 NRC 263, 273 (1979). There, the Appeal Board observed:

> [T]here is neither a statutory nor a regulatory requirement that every operational detail set forth in an applicant's safety analysis report (or equivalent) be subject to a technical specification, to be included in the license as an absolute condition of operation which is legally binding upon the licensee unless and until changed with specific Commission approval. Rather, as best we can discern it, the contemplation of both the Act and the regulations is that technical specifications are to be reserved for those matters as to which the imposition of rigid conditions or limitations upon reactor operation is deemed necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety.

By this approach, existing LCO requirements that fall within or satisfy any of the criteria in the Final Policy Statement should be retained in the TS; those LCO requirements that do not fall within or satisfy these criteria may be relocated to licensee-controlled documents. The Commission codified the four criteria in 10 CFR 50.36 (60 FR 36953, July 19, 1995). The Final Policy Statement criteria are as follows:

Criterion 1

> Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.

Criterion 2

A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

Criterion 3

A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

Criterion 4

A structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.

Part III of this SE explains the NRC staff conclusion that the conversion of the Palisades CTS to those based on STS, as modified by plant-specific changes, is consistent with the Palisades current licensing basis and the requirements and guidance of the Final Policy Statement and 10 CFR 50.36.

III. EVALUATION

The NRC staff's ITS review evaluates changes to CTS that fall into five categories defined by the licensee and includes an evaluation of whether existing regulatory requirements are adequate for controlling future changes to requirements removed from the CTS and placed in licensee-controlled documents. This evaluation also discusses the NRC staff's plans for monitoring the licensee's implementation of these controls at Palisades.

In addition to the initial submittal of January 26, 1998, as supplemented, the NRC staff review identified the need for clarifications and additions to the submittal in order to establish an appropriate regulatory basis for translation of current TS requirements into ITS. Each change proposed in the amendment request is identified as either a discussion of change (DOC) to CTS or a justification for deviation (JFD) from STS. The NRC staff comments were documented as requests for additional information (RAIs) and forwarded to the licensee for response by letters dated July 27, August 21, August 24, and December 4, 1998, and January 6, January 29, and March 17, 1999. The licensee provided written responses to the NRC staff requests in letters dated September 14, October 12, and November 9, 1998, and March 1, March 22, March 30, April 7, May 3, June 4, June 11,

and June 17, 1999. The docketed letters clarified and revised the licensee basis for translating CTS requirements into ITS. The NRC staff finds that the licensee's submittals provide sufficient detail to allow the staff to reach a conclusion regarding the adequacy of the licensee's proposed changes.

The license amendment application was organized such that changes were included in each of the following CTS change categories, as appropriate: administrative changes, technical changes - less restrictive (specific), technical changes - less restrictive (generic), technical changes - more restrictive, and relocated specifications.

(1) Administrative Changes, (A), i.e., non-technical changes in the presentation of existing requirements;

(2) Technical Changes - More Restrictive, (M), i.e., new or additional CTS requirements;

(3) Technical Changes - Less Restrictive (specific), (L), i.e., changes, deletions and relaxations of existing TS requirements;

(4) Technical Changes - Less Restrictive (generic), (LA), i.e., deletion of existing TS requirements by movement of information and requirements from existing specifications (that are otherwise being retained) to licensee-controlled documents, including TS Bases; and

(5) Relocated Specifications, (R), i.e., relaxations in which whole specifications (the LCO and associated action and SR) are removed from the existing TS (an NRC-controlled document) and placed in licensee-controlled documents.

These general categories of changes to the licensee's current TS requirements and STS differences may be better understood as follows:

A. Administrative Changes

Administrative (non-technical) changes are intended to incorporate human factors principles into the form and structure of the ITS so that plant operations personnel can use them more easily. These changes are editorial in nature or involve the reorganization or reformatting of CTS requirements without affecting technical content or operational restrictions. Every section of the ITS reflects this type of change. In order to ensure consistency, the NRC staff and the licensee have used STS as guidance to reformat and make other administrative changes. Among the changes proposed by the licensee and found acceptable by the NRC staff are:

(1) providing the appropriate numbers, etc., for STS bracketed information (information that must be supplied on a plant-specific basis and that may change from plant to plant)

(2) identifying plant-specific wording for system names, etc.

(3) changing the wording of specification titles in STS to conform to existing plant practices

(4) splitting up requirements currently grouped under a single current specification to more appropriate locations in two or more specifications of ITS

(5) combining related requirements currently presented in separate specifications of the CTS into a single specification of ITS.

Table A lists the administrative changes proposed in ITS. Table A is organized by the corresponding ITS section discussion of change, and provides a summary description of the administrative change that was made, and CTS and ITS LCO references. The NRC staff reviewed all of the administrative and editorial changes proposed by the licensee and finds them acceptable, because they are compatible with the Writer's Guide and STS, do not result in any substantive change in operating requirements and are consistent with the Commission's regulations.

B. Technical Changes - More Restrictive

The licensee, in electing to implement the specifications of STS proposed a number of requirements more restrictive than those in the CTS. ITS requirements in this category include requirements that are either new, more conservative than corresponding requirements in the CTS, or that have additional restrictions that are not in the CTS but are in STS. Examples of more restrictive requirements are placing an LCO on plant equipment which is not required by the CTS to be operable, more restrictive requirements to restore inoperable equipment, and more restrictive SRs. Table M lists all the more restrictive changes proposed in ITS. Table M is organized by the corresponding ITS section discussion of change and provides a summary description of the more restrictive change that was adopted, and CTS and ITS LCO references. These changes are additional restrictions on plant operation that enhance safety and are acceptable.

C. Technical Changes - Less Restrictive (Specific)

Less restrictive requirements include changes, deletions and relaxations to portions of current TS requirements that are not being retained in ITS. When requirements have been shown to give little or no safety benefit, their removal from the TS may be appropriate. In most cases,

relaxations previously granted to individual plants on a plant-specific basis were the result of (1) generic NRC actions, (2) new staff positions that have evolved from technological advancements and operating experience, or (3) resolution of the Owners Groups comments on STS. The NRC staff reviewed generic relaxations contained in the STS and found them acceptable because they are consistent with current licensing practices and the Commission's regulations. The Palisades design was also reviewed to determine if the specific design basis and licensing basis are consistent with the technical basis for the model requirements in STS, and thus provide a basis for ITS.

A significant number of changes to the CTS involved changes, deletions and relaxations to portions of current TS requirements evaluated as Categories I through VIII that follow:

Category I - Relaxation of LCO

Category II - Relaxation of Applicability

Category III - Relaxation of Required Actions

Category IV - Relaxation of Allowed Outage Time

Category V - Deletion of Surveillance Requirement (SR)

Category VI - Relaxation of Surveillance Requirement Acceptance Criteria

Category VII - Relaxation of Surveillance Frequency

Category VIII - Deletion of Requirement for 30-day Special Report to NRC

The following discussions address why various technical specifications within each of the eight categories of information or specific requirements are not required to be included in ITS.

<u>Relaxation of LCO</u> *(Category I)*

CTS provides LCO requirements. The ITS reflect the STS approach to provide LCO requirements that specify the protective limit that is required to meet safety analysis assumptions for required features. The protective limits replace the lists of specific devices previously found to be acceptable to the NRC staff for meeting the LCO. The ITS changes provide the same degree of protection required by the safety analysis and provide flexibility for meeting limits without adversely affecting operations since equivalent features are required to be operable. These changes are consistent with STS and changes specified as Category I are acceptable.

Relaxation of Applicability *(Category II)*

Reactor operating conditions are used in CTS to define when the LCO features are required to be operable. CTS applicabilities can be specific defined terms of reactor conditions: hot shutdown, cold shutdown, reactor critical or power operating condition. Applicabilities can also be more general. Depending on the circumstances, CTS may require that the LCO be maintained within limits in "all modes" or "any operating mode." Generalized applicability conditions are not contained in STS, therefore ITS eliminate CTS requirements such as "all modes" or "any operating mode," replacing them with ITS defined modes or applicable conditions that are consistent with the application of the plant safety analysis assumptions for operability of the required features.

In another application of this type of change, CTS requirements may be eliminated during conditions for which the safety function of the specified safety system is met because the feature is performing ITS intended safety function. Deleting applicability requirements that are indeterminate or which are inconsistent with application of accident analyses assumptions is acceptable because when LCOs cannot be met, the TS are satisfied by exiting the applicability thus taking the plant out of the conditions that require the safety system to be operable. These changes are consistent with STS and changes specified as Category II are acceptable.

Relaxation of Required Actions *(Category III)*

Upon discovery of a failure to meet an LCO, STS specify required actions to complete for the associated TS conditions. Required actions of the associated conditions are used to establish remedial measures that must be taken in response to the degraded conditions. Adopting required actions from the STS is acceptable because required actions take into account the operability status of redundant systems of TS required features, the capacity and capability of the remaining features, and the compensatory attributes of the required actions as compared to the LCO requirements. These changes are consistent with STS and required actions specified as Category III are acceptable.

Relaxation of Allowed Outage Time *(Category IV)*

Upon discovery of a failure to meet an LCO, STS specify times for completing required actions of the associated TS conditions. Required actions of the associated conditions are used to establish remedial measures that must be taken within specified completion times (allowed outage times). These times define limits during which operation in a degraded condition is permitted.

Adopting completion times from the STS is acceptable because completion times take into account the operability status of the redundant systems of TS required features, the

capacity and capability of remaining features, a reasonable time for repairs or replacement of required features, and the low probability of a design basis accident (DBA) occurring during the repair period. These changes are consistent with STS and allowed outage time extensions specified as Category IV are acceptable.

Deletion of Surveillance Requirement (SR) *(Category V)*

CTS require safety systems to be tested and verified operable prior to entering applicable conditions. The ITS reflect STS required surveillance requirements, eliminating unnecessary CTS surveillance requirements that do not contribute to verification that the equipment used to meet the LCO can perform ITS required functions. Thus, appropriate equipment continues to be tested. These changes are consistent with STS and changes specified as Category V are acceptable.

Relaxation of Surveillance Requirement Acceptance Criteria *(Category VI)*

CTS require safety systems to be tested and verified operable prior to entering applicable conditions. ITS provide the additional requirement to verify operability by actual or test conditions. Adopting the STS allowance for "actual" conditions is acceptable because TS required features cannot distinguish between an "actual" signal or a "test" signal. Category VI also includes changes to CTS requirements that are replaced in the ITS with separate and distinct testing requirements which when combined include operability verification of all TS required components for the features specified in the CTS. Adopting this format preference in the STS is acceptable because TS SRs that remain include testing of all previous features required to be verified operable. These changes are consistent with STS and changes specified as Category VI are acceptable.

Relaxation of Surveillance Frequency *(Category VII)*

CTS and ITS surveillance frequencies specify time interval requirements for performing surveillance requirement testing. Increasing the time interval between surveillance tests in the ITS results in decreased equipment unavailability due to test which also increases equipment availability. In general, the STS contain test frequencies that are consistent with industry practice or industry standards for achieving acceptable levels of equipment reliability. Adopting testing practices specified in the STS is acceptable based on similar design, like-component testing for the system application and the availability of other TS requirements which provide regular checks to ensure limits are met.

Reduced testing can result in a safety enhancement because the unavailability due to testing is reduced; in turn, reliability of the affected structure, system or component should remain constant or increase. Reduced testing is acceptable where operating experience, industry practice or the industry standards such as manufacturers'

recommendations have shown that these components usually pass the Surveillance when performed at the specified interval, thus the frequency is acceptable from a reliability standpoint. Surveillance frequency changes to incorporate alternate train testing have been shown to be acceptable where other qualitative or quantitative test requirements are required which are established predictors of system performance, e.g., the CTS 3.8.1 Frequency for verifying boron concentration has been changed from "on each shift" to "72 hours." This less restrictive change decreases the verification frequency from a maximum of 16 hours to a maximum of 72 hours. Considering the large volume of water in the primary coolant system (and refueling cavity during Core alterations), and administrative controls instituted to preclude a boron dilution event, a sampling Frequency of 72 hours is adequate to identify slow changes in boron concentration. Additionally, surveillance frequency extension can be based on staff-approved topical reports. The NRC staff has accepted topical report analyses that bound the plant-specific design and component reliability assumptions. These changes are consistent with STS and changes specified as Category VII are acceptable.

Deletion of Requirement for 30-Day Special Report to NRC *(Category VIII)*

CTS include requirements to submit Special Reports when specified limits are not met. Typically, the time period for the report to be issued is within 30 days. However, the STS eliminates the TS administrative control requirements for Special Reports and instead relies on the reporting requirements of 10 CFR 50.73. ITS changes to reporting requirements are acceptable because 10 CFR 50.73 provides adequate reporting requirements, and the special reports do not affect continued plant operation. Therefore, this change has no impact on the safe operation of the plant. Additionally, deletion of TS reporting requirements reduces the administrative burden on the plant and allows efforts to be concentrated on restoring TS required limits. These are consistent with STS and changes specified as Category VIII are acceptable.

Table L lists the less restrictive changes to the CTS by Category I through VIII. The Table is organized by ITS section and includes: the ITS section number followed by the change identifier, e.g., 3.2.1 L1 (ITS Section 3.2.1, DOC L1), a summary description of the less restrictive change that was adopted, the ITS and CTS references, and the applicable category of the change. The less restrictive change categories are listed at the bottom of each page of the Table L.

If a change category is not applicable to the less restrictive change, the word "Unique" is specified in the table for that change and an evaluation of the change is discussed below. Each evaluation is preceded by the ITS section or specification and the change identifier, followed by the discussion of the less restrictive change that was not categorized. All of these changes to the CTS are consistent with the STS and, therefore, are not beyond-scope issues for the Palisades ITS conversion. Changes that are beyond-scope issues for the ITS

conversion are addressed in Section III, G, 'Evaluation of Other TS Changes Included in the Application for Conversion to ITS' in this Safety Evaluation..

Include writeup of Palisades "L" changes which could not be binned in the above categories. These are the "Unique" Less Restrictive changes.

For the reasons presented above, these less restrictive requirements are acceptable because they will not affect the safe operation of the plant. The TS requirements that remain are consistent with current licensing practices, operating experience, and plant accident and transient analyses, and provide reasonable assurance that public health and safety will be protected.

D. Relocated Less Restrictive Requirements

When requirements have been shown to give little or no safety benefit, their removal from the TS may be appropriate. In most cases, relaxations previously granted to individual plants on a plant-specific basis were the result of (1) generic NRC actions, (2) new staff positions that have evolved from technological advancements and operating experience, or (3) resolution of the Owners Groups comments on STS. The NRC staff reviewed generic relaxations contained in STS and found them acceptable because they are consistent with current licensing practices and the Commission's regulations. The Palisades design was also reviewed to determine if the specific design basis and licensing basis are consistent with the technical basis for the model requirements in STS, and thus provide a basis for ITS. A significant number of changes to the CTS involved the removal of specific requirements and detailed information from individual specifications evaluated to be Types 1 through 4 that follow:

Type 1 Details of System Design and System Description Including Design Limits

Type 2 Descriptions of Systems Operation

Type 3 Procedural Details for Meeting TS Requirements and Related Reporting Problems

Type 4 Relocation of TS Administrative Requirements Redundant to Regulations

The following discussions address why each of the four types of information or specific requirements are not required to be included in ITS.

Details of System Design and System Description Including Design Limits *(Type 1)*

The design of the facility is required to be described in the UFSAR by 10 CFR 50.34. In addition, the quality assurance (QA) requirements of Appendix B to 10 CFR Part 50 require that plant design be documented in controlled procedures and drawings, and maintained in accordance with an NRC-approved QA plan (reference in the UFSAR). In 10 CFR 50.59 controls are specified for changing the facility as described in the UFSAR, and in 10 CFR 50.54(a) criteria are specified for changing the QA plan. In ITS, the Bases also contain descriptions of system design. ITS 5.5.14 specifies controls for changing the Bases. Removing details of system design from the CTS is acceptable because this information will be adequately controlled in the UFSAR, controlled design documents and drawings or the TS Bases, as appropriate. Cycle-specific design limits are moved from the CTS to the Core Operating Limits Report (COLR) in accordance with Generic Letter (GL) 88-16. ITS Administrative Controls are revised to include the programmatic requirements for the COLR.

Descriptions of Systems Operation *(Type 2)*

The plans for the normal and emergency operation of the facility are required to be described in the UFSAR by 10 CFR 50.34. ITS 5.4.1.a requires written procedures to be established, implemented, and maintained for plant operating procedures including procedures recommended in RG 1.33, Revision 2, Appendix A, February 1978. Controls specified in 10 CFR 50.59 apply to changes in procedures as described in the UFSAR. In ITS, the Bases also contain descriptions of system operation. It is acceptable to remove details of system operation from the TS because this type of information will be adequately controlled in the UFSAR, plant operating procedures, and the TS Bases, as appropriate.

Procedural Details for Meeting TS Requirements & Related Reporting Problems *(Type 3)*

Details for performing action and surveillance requirements are more appropriately specified in the plant procedures required by ITS 5.4.1, the UFSAR, and ITS Bases. For example, control of the plant conditions appropriate to perform a surveillance test is an issue for procedures and scheduling and has previously been determined to be unnecessary as a TS restriction. As indicated in Generic Letter 91-04, allowing this procedural control is consistent with the vast majority of other SRs that do not dictate plant conditions for surveillances. Prescriptive procedural information in an action requirement is unlikely to contain all procedural considerations necessary for the plant operators to complete the actions required, and referral to plant procedures is therefore required in any event. Other changes to procedural details include those associated with limits retained in the ITS. For example, the ITS requirement may refer to programmatic

requirements such as COLR, included in ITS Section 5.6.5, which specifies the scope of the limits contained in the COLR and mandates NRC approval of the analytical methodology.

The removal of these kinds of procedural details from the CTS is acceptable because they will be adequately controlled in the UFSAR, plant procedures, Bases and COLR, as appropriate. This approach provides an effective level of regulatory control and provides for a more appropriate change control process. Similarly, removal of reporting requirements from LCOS is appropriate because ITS 5.6, 10 CFR 50.36 and 10 CFR 50.73 adequately cover the reports deemed to be necessary.

Relocation of TS Administrative Requirements Redundant to Regulation *(Type 4)*

Certain Palisades CTS administrative requirements were redundant to regulations and were relocated from the TS to the FSAR or other licensee-controlled documents. The Final Policy Statement and 10 CFR 50.36 allow licensees to voluntarily use the criteria in these regulations to relocate existing Technical Specifications that do not meet any of the criteria to licensee-controlled documents. Changes to the facility or to procedures described in the FSAR are made in accordance with 10 CFR 50.59. Changes made in accordance with the provisions of other licensee-controlled documents (e.g., plant procedures, QA plan, ODCM) are subject to the specific requirements of those documents. For example, CTS 5.4.2a states, "Irradiated fuel bundles will be stored prior to off-site shipment in the stainless steel-lined spent fuel pool." This type of information is contained in the refueling and fuel handling procedures which are under licensee control. This information is not required by 10 CFR 50.36(c)(4) to be in the technical specifications. Removing this information from the CTS and controlling it in plant procedures does not adversely impact safety. Therefore, relocation of the administrative details identified above, is acceptable.

Table LA lists the requirements and detailed information in the CTS that are being relocated to licensee-controlled documents and not retained in the ITS. Organized by ITS section the table provides the following: the ITS section followed by the change identifier, e.g., 3.8.1 LA1 (ITS Section 3.8.1, DOC LA 1); the CTS reference where the detail was located; a summary description of the relocated details; the document that retains the relocated details or requirements (i.e., new location); the regulation or ITS section for controlling future changes to the relocated detail or requirements (i.e., the change controls); a characterization of the change; and a reference to the specific change type, as discussed above, for not including the information or specific requirements in ITS (i.e., Type 1, 2, 3, or 4 of the Table LA).

The NRC staff has concluded that these types of detailed information and specific requirements do not need to be included in the ITS to ensure the effectiveness of ITS to adequately protect the health and safety of the public. Accordingly, these requirements may be moved to one of the following licensee-controlled documents for which changes are adequately governed by a regulatory or TS requirement: (1) TS Bases controlled by ITS 5.5.12, "Technical Specifications Bases Control Program;" (2) Plant Procedures and UFSAR (includes the Operating Requirements Manual (ORM) by reference) controlled by 10 CFR 50.59; (3) the Offsite Dose Calculation Manual (ODCM) controlled by ITS 5.5.1; and (4) the QA plans as approved by the NRC and referenced in the UFSAR and controlled by 10 CFR Part 50, Appendix B.

In Amendment 181, dated May 7, 1998, the review and audit functions of CTS Section 6.8 were relocated without change to the Quality Program Description (QPD). Additional changes to the QPD were made in accordance with10 CFR 50.54(a). Section 13.4, "Operational Review," of NUREG-0800, "Standard Review Plan," provided the acceptance criteria used by the staff to evaluate the technical specification provisions related to the plant staff review of operational activities performed by licensee organizational units fulfilling the review and audit functions. The acceptance criteria was based on meeting the relevant requirements of 10 CFR 50.50(b) as it related to the licensee being technically qualified to engage in the licensed activities, and of Appendix B to 10 CFR Part 50 as it related to the review and audit functions required by the licensee's quality assurance program.

The technical specification provisions associated with the review and audit function satisfied the criteria in 10 CFR 50.35(c)(5) and Appendix B to 10 CFR Part 50. However, as stated in the Amendment 174, Background, Section 2.4.1, these provisions could be deleted from the technical specifications and relocated to the licensee's QPD because other regulations provided adequate regulatory control of the details of these administrative controls.

In addition, the following considerations supported relocating these requirements from the technical specifications:

A. The Plant Review Committee (PRC) function, composition, alternates, meeting frequency, quorum, responsibilities, authority, and records provisions are duplicated verbatim in Appendix B, "Plant Review Committee (PRC)," of Revision 18 to CPC-2A. Subsequent changes to the PRC requirements are controlled under 10 CFR 50.54(a).

B. The Independent Safety Review Group (ISRG) function, composition, consultants, responsibilities, review, authority, and records provisions are duplicated without change in Appendix C, "Independent Safety Review," of Revision 18 to CPC-2A. Subsequent changes to these requirements are controlled under 10 CFR 50.54(a).

C. Audit frequencies of operational activities are duplicated without change in Appendix D, "Audit Frequencies," of CPC-2A. Subsequent changes associated with the requirements are controlled under 10 CFR 50.54(a).

The staff verified that the requirements were appropriately incorporated in the QPD; therefore, the relocation of these requirements from the technical specifications was acceptable.

To the extent that requirements and information have been relocated to licensee-controlled documents, such information and requirements are not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety. Further, where such information and requirements are contained in LCOS and associated requirements in the CTS, the NRC staff has concluded that they do not fall within any of the four criteria in the Final Policy Statement (discussed in Part II of this safety evaluation). Accordingly, existing detailed information and specific requirements, such as generally described above, may be deleted from the CTS.

E. Relocated Specifications

The Final Policy Statement states that LCOS and associated requirements that do not satisfy or fall within any of the four specified criteria may be relocated from existing TS (an NRC-controlled document) to appropriate licensee-controlled documents. These requirements include the LCOS, Action Statements (ACTIONS), and associated SRs. In ITS application, the licensee proposed relocating such specifications to the Updated Final Safety Analysis Report (UFSAR) (includes the Operating Requirements Manual (ORM) by reference), and the ODCM, as appropriate. The staff has reviewed the licensee's submittals, and finds that relocation of these requirements to the UFSAR (and ORM) and ODCM is acceptable, in that changes to the UFSAR will be adequately controlled by 10 CFR 50.59 and changes to the ODCM will be controlled by ITS 5.5.1. These provisions will continue to be implemented by appropriate plant procedures; i.e., operating procedures, maintenance procedures, surveillance and testing procedures, and work control procedures.

The licensee, in electing to implement the specifications of STS, also proposed, in accordance with the criteria in the Final Policy Statement, to entirely remove certain TS from the CTS and place them in licensee-controlled documents noted in Table R. Table R lists all specifications and specific CTS details that are relocated, based on the Final Policy Statement, to licensee-controlled documents in ITS. Table R provides: the section designation, followed by the discussion of change identifier, e.g., 3.9 R1 (ITS Section 3.9, DOC R1), a CTS reference; a summary description of the requirement; the name of the document that retains the CTS requirements; the method for controlling future changes to relocated requirements; and a characterization of the discussion of change. The NRC staff

evaluation of each relocated specification and specific CTS detail presented in Table R is provided below.

CTS 3.2 - Chemical and Volume Control System (ITS 3.1 - Reactivity Control)

The requirements associated with the Chemical and Volume Control System and requirements that relate to operability of the concentrated boric acid system are relocated to the ORM. CTS 3.2, Chemical and Volume Control System (CVCS) specifies requirements for the charging pumps and the concentrated boric acid system. Other requirements in the Palisades CTS which relate to operability to the concentrated boric acid system are Table 4.2.2, item 9, on boric acid heat tracing; Table 4.2.1, item 4, on testing of concentrated boric acid tanks; Table 3.17.6, item 14 concentrated boric acid tank lo level alarm and CHANNEL FUNCTIONAL TEST.

The initial Main Steam Line Break (MSLB) analyses assumed the addition of concentrated boric acid by the charging pumps. This addition was necessary to limit the extent of the return to power which was predicted for a MSLB late in core life. The MSLB accident was reanalyzed when new steam generators were installed. The reanalyses did not assume charging pump operation or concentrated boric acid addition. The new steam generators incorporate a flow restrictor in the outlet nozzle which reduces the maximum steam flow rate sufficiently to show satisfactory analytical results without the CVCS system. No other accident analyses assume operation of the charging pumps or addition of concentrated boric acid to mitigate the consequences of an accident.

The Chemical and Volume Control System does not meet any criteria of 10 CFR 50.36(c)(2)(ii). Therefore, per the NRC Final Policy Statement this Specification is relocated out the ITS. Any changes to these former requirements regarding the Chemical and Volume Control System charging pumps and the concentrated boric acid system as relocated to the ORM will require a 10 CFR 50.59 evaluation. The 10 CFR 50.59 evaluation ensures that any changes to these procedures and descriptions will be evaluated for safety impact. This change is consistent with the STS.

CTS 3.11, 3.17.6, and 4.18.1 - Power Distribution Monitoring (ITS 3.2 - Power Distribution Monitoring)

Requirements for Power Distribution Limits monitoring functions are relocated to the ORM. CTS 3.11.1 and 4.18.1 provide incore monitoring system instrumentation requirements related to Power Distribution Limits monitoring functions. Similarly, CTS 3.11.2, 3.17.6.15, 3.17.6.16, the associated ACTIONS in CTS 3.17.6.21, Table 3.17.6, items 15 and 16 (and associated Note (a)), CTS Table 4.17.6, items 15 and 16, and CTS 4.18.2.1a and c provide excore monitoring system instrumentation requirements related to Power Distribution Limits

monitoring functions. Either of these two core power distribution monitoring systems provides monitoring of the core power distribution parameters, but the monitoring systems are not part of a primary success path in the mitigation of a Design Basis Accident (DBA) or transient. The incore and excore monitoring systems, as related to Power Distribution Limit monitoring, do not meet any criteria in 10 CFR 50.36(c)(2)(ii). Therefore, per the NRC Final Policy Statement this Specification is relocated out the ITS. Any changes to these former requirements regarding Power Distribution Limits monitoring functions as relocated to the ORM will require a 10 CFR 50.59 evaluation. The 10 CFR 50.59 evaluation ensures that any changes to these procedures and descriptions will be evaluated for safety impact. This change is consistent with the STS.

CTS 3.3 - Containment Radiation Levels (ITS 3.3 - Instrumentation)

Requirements for containment radiation monitors are relocated to the ORM. CTS 3.8.1 requires radiation levels in the containment to be monitored continuously during refueling operations. CTS 3.8.2 provides the required ACTIONS to be taken when CTS 3.8.1d is not met. The radiation monitoring instrumentation is used to monitor radiation levels throughout the plant. Some radiation monitoring instrumentation provides input to safety systems in order for these systems to mitigate DBAs. The radiation monitors in this section are not required to mitigate any DBAs, nor do they provide input into any system required to mitigate DBAs. These radiation monitors do not meet any criteria in 10 CFR 50.36(c)(2)(ii). Therefore, per the NRC Final Policy Statement this Specification is relocated out of the ITS. Any changes to these former requirements regarding containment radiation monitors as relocated to the ORM will require a 10 CFR 50.59 evaluation. The 10 CFR 50.59 evaluation ensures that any changes to these procedures and descriptions will be evaluated for safety impact. This change is consistent with the STS.

CTS 3.17.6 - Operating Requirements for Instrumentation (ITS 3.3 - Instrumentation)

Operating requirements for instrumentation that monitors safety injection refueling water tank temperature (CTS 3.17.6.3), main feedwater flow (3.17.6.4), temperature (CTS 3.17.6.5) and auxiliary feedwater flow (CTS 3.17.6.6 and 3.17.6.7) are relocated to the ORM. These instruments do not provide inputs to safety systems to mitigate DBAs. These systems are not required to mitigate any DBAs, nor do they provide input into any system required to mitigate DBAs. These monitors do not provide a Type A or Category 1 post accident monitoring function; further, these monitors do not meet any criteria in 10 CFR 50.36(c)(2)(ii). Therefore, per the NRC Final Policy statement these Specifications are relocated out of the ITS. Any changes to these former requirements regarding operating requirements for instrumentation monitors as relocated to the ORM will require a 10 CFR 50.59 evaluation. The 10 CFR 50.59 evaluation ensure that any changes to these

procedures and descriptions will be evaluated for safety impact. This change is consistent with the STS.

CTS 3.17.6 - Primary Safety Valve Position Indicator, PORV Position Indicators, PORV Block Valve Position Indicator, and Service Water Break Detector (ITS 3.3 - Instrumentation)

The requirements for primary safety valve position indicator (CTS 3.17.6.8), PORV position indicators (CTS 3.17.6.9), PORV block valve position indicator (CTS 3.17.6.10), and service water break detector (CTS 3.17.6.11) are relocated to the ORM. These instruments provide indications to the operator in the event of an abnormal condition associated with the specific monitored parameters. These instruments do not provide inputs to safety systems in order for these systems to mitigate DBAs. These instruments are not required to mitigate any DBAs, nor do they provide input into any system required to mitigate DBAs. These instrument monitors do not meet any criteria in 10 CFR 50.36(c)(2)(ii). Therefore, per the NRC Final Policy Statement these Specifications are relocated out of the ITS. Any changes to these former requirements regarding instrument monitors as relocated to the ORM will require a 10 CFR 50.59 evaluation. The 10 CFR 50.59 evaluation ensures that any changes to these procedures and descriptions will be evaluated for safety impact. This is consistent with the STS.

CTS 3.17.6.19 - Fuel Pool Area Radiation Monitors (ITS 3.3 - Instrumentation)

Requirements for fuel pool area radiation monitors are relocated to the ORM. CTS Table 3.17.6, item 19, and associated Note(b), requires two fuel pool area radiation monitors to be operable at HOT STANDBY condition and above. CTS 3.17.6.19 requires the plant to stop moving fuel within the fuel pool area and to restore the monitor to OPERABLE status or provide equivalent monitoring capability within 72 hours. CTS Table 4.17.6, item 19 requries periodic surveillances on these monitors. These instruments do not provide inputs to safety systems to mitigate DBAs. The fuel pool radiation monitors are not required to mitigate any DBAs, nor do they provide input into any system required to mitigate DBAs. Therefore, per the NRC Final Policy Statement these Specifications are relocated out of the ITS. Any changes to these former requirements regarding fuel pool area radiation monitors as relocated to the ORM will require a 10 CFR 50.59 evaluation. The 10 CFR 50.59 evaluation ensures that any changes to these procedures and descriptions will be evaluated for safety impact. This change is consistent with the STS.

CTS 3.4 - Pressurizer Heatup and Cooldown Rate Limits (ITS 3.4 - Primary Coolant System (PCS)

Requirements for pressurizer heatup and cooldown rate limits are relocated to the ORM. CTS 3.1.2b specifies that the pressurizer heatup rate shall be maintained $\leq$ 200°F/hour. When

shutdown cooling isolation valves MO-3015 and MO-3016 are open, pressurizer heatup rate shall be maintained $\leq$ 60°F/hour. The heatup and cooldown rate limits are placed on the pressurizer to prevent non-ductile failure and assure compatibility of operation with the fatigue analysis performed. The limits meet the requirements given in the ASME Boiler and Pressure Vessel Code, Section III, Appendix G. These limitations are consistent with structural analysis results. Although these limits represent operating restrictions, they are not initial conditions assumed in a DBA or transient. These limits do not meet any criteria in 10 CFR 50.36(c)(2)(ii). In addition, pressurizer heatup and cooldown rate limits are not used for, or capable of, detecting a significant abnormal degradation of the primary coolant pressure boundary prior to a DBA; are not part of a primary success path in the mitigation of DBA or transient; and were found to be a non-risk contributor to core damage frequency and offsite release. Therefore, per the NRC Final Policy Statement these Specifications are relocated out of the ITS. Any changes to these former requirements regarding pressurizer heatup and cooldown rate limits as relocated to the ORM will require a safety evaluation pursuant to 10 CFR 50.59. The 10 CFR 50.59 evaluation ensures that any changes to these procedures and descriptions will be evaluated for safety impact. This change is consistent with the STS.

<u>CTS 3.1.6 - Maximum Oxygen and Halogen Concentrations</u> (ITS 3.4 - Primary Coolant System (PCS)

Requirements for the maximum oxygen and halogen concentrations allowed in the Primary Coolant System are relocated to the ORM. CTS 3.1.6 contains requirements for the maximum oxygen and halogen concentrations allowed in the Primary Coolant System, and the ACTIONS necessary if these parameters exceed their specified limits. The surveillance requirements associated with CTS 3.1.6 are contained in CTS Table 4.2.1, item 1. The purpose of this specification is to maintain good water quality chemistry in the PCS to protect against potential stress corrosion attacks. Although poor coolant water chemistry contributes to the long term degradation of system materials of construction, it is not of immediate importance to plant operators. Chemistry monitoring activities are of a long term preventative purpose rather than a short term mitigative concern. When evaluated against 10 CFR 50.36(c)(2)(ii) and consistent with the finding of CEN-355, "CE Owners Group Restructured Standard Technical Specifications, Criteria Application," primary coolant chemistry requirements do not meet the criteria for inclusion in the Technical Specifications. Therefore, per the NRC Final Policy Statement these Specification are relocated out the Technical Specifications. Any changes to these former requirements regarding maximum oxygen and halogen concentrations allowed in the Primary Coolant Systems as relocated to the ORM will require a 10 CFR 50.59 evaluation. The 10 CFR 50.59 evaluation ensures that any changes to these procedures and descriptions will be evaluated for safety impact. This change is consistent with the STS.

CTS 4.12 - Augmented Inservice Inspection Program for High Energy Lines Outside of Containment (ITS 3.7 - Plant Systems)

Requirements for Augmented Inservice Inspection Program for high energy lines outside of containment are relocated to the ORM. CTS 4.12 contains a requirement for an "Augmented Inservice Inspection Program for High Energy Liens Outside of Containment." This requirement applies to welds in piping systems or portions of systems located outside of containment where protection from the consequence of postulated ruptures is not provided by a system of pipe whip restraints, jet impingement barriers, protective enclosures, or other measures designed specifically to cope with such ruptures. Specifically, the program applies to welds in the main steam and main feedwater lines located inside the main steam and feedwater penetration rooms to assure continued integrity of these piping systems over their service life. Although the CTS does not contain a specific LCO for an "Augmented Inservice Inspection Program for High Energy Lines Outside of Containment" (i.e., no explicit operability requirement exists and no required action for failure to meet the specified inspection is provided), the requirements of CTS 4.12 was evaluated to the criteria of 10 CFR 50.36 consistent with the application of the selection criteria applied to the LCO contained in the CTS. The results of this evaluation concluded that this specification did not meet any criteria in 10 CFR 50.36(c)(2)(ii). Therefore, per the NRC Final Policy Statement this Specification is relocated out of the ITS. Any changes to these former requirements regarding Augmented Inservice Inspection Program for high energy lines outside of containment as relocated to the ORM will require a safety evaluation pursuant to 10 CFR 50.59. The 10 CFR 50.59 evaluation ensures that any changes to these procedures and descriptions will be evaluated for safety impact. This change is consistent with the STS.

CTS 3.8.1d - Spent Fuel Storage Area Radiation Monitors (ITS 3.9 - Refueling Operations)

Requirements associated with the spent fuel storage area radiation monitors are relocated to the ORM. CTS 3.8.1d requires radiation levels in the spent fuel storage area to be monitored continuously during refueling operations. CTS 3.8.2 provides the required ACTIONS to be taken when CTS 3.8.1d is not met. The basis of this requirement is to provide immediate indication when radiation levels exceed a specified setpoint. These radiation monitors do not provide any safety related interlock functions and are not assumed in any Design Basis Event (DBE). CTS 3.8.1d does not meet any criteria in 10 CFR 50.36(c)(2)(ii). Therefore, per the NRC Final Policy Statement this Specification is relocated out of the ITS. Any changes to these former requirements regarding spent fuel storage area radiation monitors as relocated to the ORM will require a safety evaluation pursuant to 10 CFR 50.59. The 10 CFR 50.59 evaluation ensures that any changes to these procedures and descriptions will be evaluated for safety impact. This change is consistent with the STS.

CTS 3.8.1h - Communication Between Control Room and Refueling Machine Operator (ITS 3.9 - Refueling Operations)

Requirements for communication between personnel in the control room and the refueling machine operator are relocated to the ORM. CTS 3.8.1h requires direct communication between personnel in the control room at the refueling machine whenever changes in core geometry are taking place. CTS 3.8.2 provides the required ACTIONS to be taken when CTS 3.8.1h is not met. Communication requirements allow the control room operator to inform the refueling machine operator of any impeding unsafe condition detected from the main control board indicators during fuel movement as well as, allow for the coordination of activities that require interaction between control room and containment personnel. Therefore, CTS 3.8.1h does not meet any of the criteria in 10 CFR 50.36 and per the NRC Final Policy Statement, this Specification can be relocated out of the Technical Specifications. Any changes to these former requirements regarding communications between the control room and refueling machine , as relocated to the ORM will require a safety evaluation pursuant to 10 CFR 50.59. The 10 CFR 50.59 evaluation ensures that any changes to these procedures and descriptions are evaluated for safety impact. This change is consistent with the STS.

CTS 3.8.3 - Diesel Fuel Oil, Lube Oil, and Starting Air (ITS 3.9, Refueling Operations)

The requirements associated with decay time are relocated to the ORM. CTS 3.3.3 prohibits the initiation of refueling operations before the reactor core has decayed for a minimum of 48 hours if the reactor has been operated at power levels in excess of 2% rated power. The restriction of not moving fuel in the reactor for a period of 48 hours after the power has been removed from the core takes advantage of the decay of the short-life fission products and allows any failed fuel to purge itself of fission gases, thus reducing the consequences of a fuel handling accident. Although this specification satisfies 10 CFR 50.36(c)(2)(ii) criterion 2, the activities necessary prior to commencing movement of irradiated fuel (i.e., reactor head removal, flooding of refueling cavity) ensures that there will at least be 48 hours of subcriticality before movement of any irradiated fuel. Hence, this specification has been relocated as per Industry/NRC agreement during the development of NUREG-1432. Therefore, CTS 3.8.1h does not meet any of the criteria in 10 CFR 50.36 and per the NRC Final Policy Statement, this Specification is relocated out of the ITS. Any changes to these former requirements regarding decay time, as relocated to the ORM will require a safety evaluation pursuant to 10 CFR 50.59. The 10 CFR 50.59 evaluation ensures that any changes to these procedures and descriptions are evaluated for safety impact. This change is consistent with the STS.

CTS 3.8.5 - DC Sources - Operating, 4.2.2 - Reactor Core, Table Item 6 (ITS 3.9, Refueling Operations)

CTS 3.8.5 and Table 4.2.2, item 6 associated tilt pit requirements are relocated to the ORM.

This Specification, item 6, requires that when spent fuel, which has decayed less than one year, is placed in the tilt pit storage rack, the bulk water temperature in the tilt pit storage area must be monitored continuously to assure that the water temperature does not exceed 150°F. Monitoring will continue for 24 hours after any addition of fuel to the main pool or the tilt pit, or when a failure of the spent fuel pool cooling system occurs. The bulk water temperature in the tilt pit is higher than the water in the main spent fuel pool because the amount of cooling water flow into the tilt pit is lower for the same amount of fuel assemblies in the main spent fuel pool. For this reason, storage in the tilt pit is limited to irradiated fuel assemblies that have decayed for at least one year and, assuming the failure of one spent fuel cool system pump, will not cause the bulk temperature of the tilt pit water to exceed 145°F for the normal refueling conditions. Although the limit on the tilt pit water temperature is intended to prevent damage to spent fuel assemblies, it is not an operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. Thus, the tilt pit does not meet any criteria in 10 CFR 50.36(c)(2)(ii). Therefore, CTS 3.8.5 does not meet any of the criteria in 10 CFR 50.36 and per the NRC Final Policy Statement, this Specification is relocated out the Technical Specifications. Any changes to these former requirements regarding tilt pit, as relocated to the ORM will require a safety evaluation pursuant to 10 CFR 50.59. The 10 CFR 50.59 evaluation ensures that any changes to these procedures and descriptions are evaluated for safety impact. This change is consistent with the STS.

CTS 4.2.2 - Reactor Core, Table Item 5 (ITS 3.9 - Refueling Operations)

Surveillance requirements for Refueling System Interlocks is relocated to the ORM. CTS Table 4.2.2, item 5 requires a Refueling System Interlocks functional test prior to refueling operations. The Refueling System Interlocks are designed to prevent damage to fuel assemblies and fuel handling equipment during fuel handling operations. The system interlock test ensures that the equipment used to handle fuel functions as designed and has sufficient load capacity for handling fuel assemblies. Although the CTS does not contain a specific LCO for the Refueling System Interlocks (i.e, no explicit operability requirement exists and no required action for failure to meet the specified test provided), the surveillance requirements for Refueling System Interlocks was evaluated to the criteria of 10 CFR 50.36 consistent with the evaluation performed for Manipulator Cranes found in NUREG-0212, "Standard Technical Specifications for Combustion Engineering Pressurized Water Reactors." Therefore, CTS 4.2.2 does not meet any of the criteria in 10 CFR 50.36 and per the NRC

Final Policy Statement, this Specification is relocated out of the Technical Specifications. Any changes to these former requirements regarding Refueling System Interlocks, as relocated to the ORM will require a safety evaluation pursuant to 10 CFR 50.59. The 10 CFR 50.59 evaluation ensures that any changes to these procedures and descriptions are evaluated for safety impact. This change is consistent with the STS.

Conclusions

The relocated CTS discussed above are not required to be in the TS under 10 CFR 50.36 and do not meet any criteria in 10 CFR 50.36(c)(2)(ii). They are not needed to obviate the possibility that an abnormal situation or event will give rise to an immediate threat to the public health and safety. In addition, the NRC staff finds that sufficient regulatory controls exist under the regulations cited above to maintain the effect of the provisions in these specifications. The NRC staff has concluded that appropriate controls have been established for all of the current specifications, information, and requirements that are being moved to licensee-controlled documents. This is the subject of a license condition established herewith. Until incorporated in the UFSAR and procedures, changes to these specifications, information, and requirements will be controlled in accordance with the current applicable procedures that control these documents. Following implementation, the NRC will audit the removed provisions to ensure that an appropriate level of control has been achieved. The NRC staff has concluded that, in accordance with the Final Policy Statement, sufficient regulatory controls exist under the regulations, particularly 10 CFR 50.59. Accordingly, these specifications, information, and requirements, as described in detail in this Safety Evaluation, may be relocated from CTS and placed in the UFSAR or other licensee-controlled documents as specified in the licensee's letter dated January 26, 1998.

F. Control of Specifications, Requirements, and Information Relocated from the CTS

The facility and procedures described in the UFSAR and ORM, incorporated into the UFSAR by reference, can only be revised in accordance with the provisions of 10 CFR 50.59, which ensures records are maintained and establishes appropriate control over requirements removed from CTS and over future changes to the requirements. Other licensee-controlled documents contain provisions for making changes consistent with other applicable regulatory requirements; for example, the Offsite Dose Calculation Manual (ODCM) can be changed in accordance with ITS 5.5.1, the emergency plan implementing procedures (EPIPs) can be changed in accordance with 10 CFR 50.54(q); and the administrative instructions that implement the Quality Program Description (QPD) can be changed in accordance with 10 CFR 50.54(a) and 10 CFR Part 50, Appendix B. Temporary procedure changes are also controlled by 10 CFR 50.54(a). The documentation of these changes will be maintained by the licensee in accordance with the record retention requirements specified in the licensee's QA plan for Palisades and such applicable regulations as 10 CFR 50.59.

The licensee's letter, dated January 26, 1998, states that all CTS requirements that will be relocated by this conversion have been relocated to the ORM that has been incorporated in the FSAR by reference. Changes to the ORM will be evaluated under 10 CFR 50.59.

G. Evaluation of Other TS Changes Included in the Application for Conversion to Improved Technical Specifications

ITS 3.0 - LCO Applicability, LCO 3.0.3 (BYS 3.0-1)

ITS 3.0.3.b proposes a requirement to have the unit in MODE 4 within 31 hours. The STS 3.0.3.b recommends that 13 hours be used as the time to be in MODE 4. However, there is a note that this is a plant-specific value and is based on the ability to cool the pressurizer and degas the primary coolant system. Because this is a plant-specific value in the STS, Palisades has exercised the option to implement a plant-specific value of 31 hours instead of 13 hours.

The staff reviewed the Palisades CTS and determined that currently there are no requirements in CTS 3.0.3 to bring the unit to MODE 4 in any particular time. The CTS do not include a MODE 4 classification or an equivalent classification. The MODE definitions at Palisades are different from that in the STS. The CTS require the plant to be in hot standby (defined as being less than 2% power) within seven hours, hot shutdown (defined as being subcritical) within 13 hours and in cold shutdown (defined as being below 210°F) within 37 hours. As a result, a time to be in MODE 4 (defined in the ITS as subcritical, below 350°F) does not exist in the CTS.

To maintain consistency with the STS, the licensee proposed a time to reach the new MODE 4 within 31 hours. This is conservative, when compared to the CTS because the CTS do not require the plant to be below 350°F in any particular time. The licensee continues to maintain the requirement in the CTS to be below 210°F in 37 hours by including in the ITS the requirement to be in MODE 5 (defined in the proposed ITS as below 200°F) within 37 hours. As a result, the proposed ITS 3.0.3.b requirement to be in MODE 4 is conservative with respect to the CTS because no equivalent TS exists in the CTS. The proposed ITS 3.0.3c, the requirement to be in the new MODE 5 within 37 hours, is also conservative with respect to the CTS because the new ITS MODE 5 is defined as being below 200°F rather than be in cold shutdown, defined in the CTS as below 210°F, within 37 hours. The staff finds the proposed ITS 3.0.3 acceptable because the proposed ITS is more conservative compared to the existing CTS.

3.3.1 - RPS Instrumentation, SR 3.3.1.5 (BYS 3.3-1)

The Frequency of the channel functional test associated with certain RPS Functions in CTS Tables 4.17.1 and 4.17.6 is 31 days. In ITS SR 3.3.1.5, the proposed frequency is 92 days. This proposed change is still under staff review.

ITS 3.4.1 - PCS Pressure, Temperature, and Flow [DNB] Limits," Action A.1 (BYS 3.4-1)

CTS 3.1.1.g(1) requires restoration of reactor inlet temperature within 30 minutes if the limit is exceeded. The ITS LCO 3.4.1, requires the primary coolant system (PCS) departure from nucleate boiling (DNB) parameters for pressurizer pressure, cold leg temperature, and total flow rate to be within the specified limits during MODE 1 operation. With any of these parameters not within the specified limits, Action A.1 requires restoration of the parameter(s) to within limits in 2 hours.

Though the action completion time of 2 hours is longer than the 30 minutes specified in the Palisades CTS 3.1.1.g(1) for restoration of the reactor inlet temperature if the limit is exceeded, the 2 hour completion time is consistent with CEOG STS. Therefore, this change is acceptable.

ITS 3.4.1, SR 3.4.1.3 - PCS Pressure, Temperature, and Flow [DNB] Limits (BYS 3.4-2)

ITS SR 3.4.1.4 requires verification of PCS total flow rate to be ≥140.7E6 lbm/hr when corrected to 532°F once every 18 months and after each plugging of 10 or more steam generator tubes.

This SR deviates from the STS SR 3.4.1.4 by deleting the "precision heat balance" flow measurement specified in the STS so that other flow measurement methods can be used. The licensee in JFD #9 states that this change is consistent with STS as modified by proposed TSTF-105. However, the staff finds that TSTF-105 cannot be referenced for justification for deviation from the STS since it has been rejected by the NRC as a generically applicable modification. On the other hand, although 3.4.1.4 deviates from STS, the staff finds that ITS SR 3.4.1.4 is consistent with CTS where no PCS flow measurement method is specified, and is consistent with the current licensing basis. Therefore, the staff finds that this change is acceptable.

ITS 3.4.5 - PCS Loops - MODE 3, ACTIONS A and B (BYS 3.4-3)

The STS 3.4.5 Action B requires placing the plant in Mode 4 in 12 hours. The ITS Action B extends the allowed outage time to 24 hours. The ITS LCO 3.4.5 specifies that two PCS

loops shall be OPERABLE and one PCS loop shall be in operation in MODE 3. If one required PCS loop is inoperable, Action A requires restoration of the required PCS loop to OPERABLE status within 72 hours. If the required Action A is not completed within the action completion time, Action B requires the plant be placed in MODE 4 within 24 hours.

The 72-hour completion time for Action A is consistent with STS, whereas the action completion time of 24 hours for Action A deviates from the STS completion time of 12 hours. In Discussion of Change (DOC) L.1, the licensee states that the ITS Action B completion time of 24 hours to place the plant in MODE 4 is acceptable since it is compatible with required operation to achieve cooldown and depressurization from the existing plant conditions in an orderly manner without challenging plant systems.

The staff finds that the total action completion time of ACTIONS A and B is less restrictive than the CTS. CTS 3.1.1.d specifies that both steam generators shall be capable of performing their heat transfer function whenever the average temperature of the primary coolant is above 300°F. Since CTS does not specify an action requirement if 3.1.1.d is not met, the plant must enter LCO 3.0.3 if one of the steam generators becomes inoperable. CTS LCO 3.0.3 requires the plant to be in cold shutdown in 25 hours (one hour to initiate ACTIONS to place the plant in a condition in which the specification does not apply and an additional 24 hours to place the plant in cold shutdown). Since the ITS total completion time of 96 hours to place the plant in hot shutdown (MODE 4) for ACTIONS A and B is no longer than either 25 hours in the CTS or 84 hours in STS, the staff finds no basis for acceptance of the deviation from both CTS and STS. However, the staff recommends that the change of Action B completion time from 12 to 24 hours, is necessary, to achieve cooldown and depressurization from the existing plant conditions in an orderly manner be evaluated generically for STS.

<u>ITS 3.4.6 - PCS Loop - MODE 4, ACTIONS</u> (BYS 3.4-4)

ITS 3.4.6 ACTIONS contain several wording deviation from the STS 3.4.5 ACTIONS. LCO 3.4.6 specifies that two Primary Cooling System (PCS) loops or trains consisting of any combination of PCS loops and shutdown cooling (SDC) trains shall be OPERABLE, and either one PCS loop or one SDC train shall be in operation in MODE 4. ACTIONS A, B, and C, respectively, specify required ACTIONS for various conditions with inoperable PCS loops and/or SDC trains.

These ACTIONS are consistent with the STS with the exception that the word "required" has been eliminated. For example, Condition A in the STS states "one <u>required</u> PCS loop inoperable and two SDC trains inoperable," whereas the word "required" is eliminated in the ITS. JFD 15 states that the Conditions, such as "one required PCS loop," as specified in the STS are inconsistent with LCO 3.4.6 which allows for various combination of two PCS loops

or SDC trains. The staff agrees with the licensee on the wording changes and recommends a generic change to the STS wording. Therefore, this change is acceptable.

ITS 3.4.10 - Pressurizer Safety Valves (BYS 3.4-5)

The CTS 3.1.7.1 requires pressurizer safety valves (PSVs) to be operable wherever the plant is above cold shutdown (> 210°F). The ITS LCO3.4.10 specifies that three PSVs shall be OPERABLE during MODES 1 or 2, or MODE 3 with all PCS cold leg temperature ≥430°F.

The ITS LCO 3.4.10 applicability modes are inconsistent with the STS of "MODES 1, 2, and 3, and MODE 4 with all PCS cold leg temperatures ≥ [285]°F," and are also inconsistent with CTS LCO 3.1.7.1, which specifies that the PSVs shall be operable when the plant is operating above Cold Shutdown. JFD #7 indicates that the deviation represents the transition in overpressure protection methods from the PSVs to the component required by the low-temperature overpressure protection (LTOP) specification, and that this change helps ensure the pressure and temperature limits of Appendix G are not violated in the event of an inadvertent heat or mass input to the PCS.

The current Palisades LTOP licensing basis, as specified in CTS 3.1.8.2, requires two PORV flow paths, each consisting of an OPERABLE PORV, to be operable when any of the PCS cold leg temperature is <430°F. Consistent with this design basis, ITS LCO 3.4.12 for the LTOP system is applicable to MODE 3 when any PCS cold leg temperature is <430°F, or in MODES 4 or 5, or MODE 6 when the reactor vessel head is on. Therefore, when the PCS temperature is <430°F, the overpressure protection relies on the LTOP system. Since the PSVs are not relied upon for overpressure protection when the PCS temperature is <430°F, the proposed applicability modes for LCO 3.4.10 for the PSVs are acceptable.

ITS 3.4.11 - Pressurizer PORVs, ACTIONS (BYS 3.4-6)

STS 3.4.11 Conditions A, B, and E differentiate between inoperable power operated relief valves (PORVs) that can be cycled, and those that cannot be cycled. Different ACTIONS are specified based on this ITS 3.4.11 ACTIONS eliminates this differentiation. LCO 3.4.11 specifies that each PORV and associated block valve shall be operable during MODES 1 or 2, or MODE 3 with all PCS cold leg temperature ≥430°F. With one PORV inoperable, Action A (and Action C for two inoperable PORVs) of ITS requires closure of associated block valves in one hour, and restoration of the PORV to OPERABLE status within 72 hours.

These action requirements deviate from those of the STS in not differentiating whether the inoperable PORV(s) is capable of being manually cycled. With one or more PORVs inoperable, the STS required ACTIONS are (1) closure of the associated block valves with power maintained to the block valves within one hour, if the inoperable PORVs are capable

of being manually cycled; and (2) closure of associated block valves with power removed within one hour, and restoration of the PORVs to OPERABLE status within 72 hours, if the inoperable PORVs are incapable of being manually cycled.

The different action requirements specified in the STS according to whether the inoperable PORVs can be manually cycled are based on a resolution described in Generic Letter (GL) 90-06 of Generic Issue 70, "Power-Operated Relief Valve and Block Valve Reliability." A PORV having excessive seat leakage but otherwise operable is considered inoperable. Closing the associated block valve of this inoperable (excessive leakage) PORV that can be manually cycled is intended to maintain the integrity of the reactor coolant pressure boundary (RCPB) by controlling identified leakage and ensuring the ability to detect unidentified RCPB leakage. Power is maintained to the block valve so that it is operable and may be subsequently opened to allow the PORV to be used to control reactor coolant pressure. For the inoperable PORV that cannot be manually cycled, the action requirements to close the associated block valves and to remove power from the block valve are to preclude any inadvertent opening of the block valve at a time in which the PORV may not be closed due to maintenance or repair to restore it to operable status.

The licensee contends (JFD #6) that there is no need to differentiate whether an inoperable PORV can be manually cycled. The licensee contends that declaring a PORV inoperable based on excessive leakage is subjective and inconsistent with the philosophy and usage rules of the TS since there is no specific criteria for the amount of allowable leakage for a PORV, nor surveillance requirements to ensure a PORV leakage is within limits. As such, the inability to cycle a PORV would represent the most common failure to meet the LCO. Also, the PCS leakage is addressed in another specification.

Although the ITS 3.4.11 ACTIONS A and Requirements, not having different action requirements depending on whether the inoperable PORVs are capable of being manually cycled, deviate from the STS action requirements as a resolution guidance of Generic Issue 70, these action requirements have been accepted by the staff as described in the staff SER, contained in a letter from A. Hsia (NRC) to R. Fenech (Consumer Power Company), "Palisades Plant - Issuance of Amendment Re: Incorporation of Generic Letter 90-06 Requirement (TAC Nos. M77368 and M77438)," dated March 29, 1994. Therefore, ITS 3.4.11 is acceptable consistent with the approved requirements.

<u>ITS 3.4.14 - PCS Pressure Isolation Valve Leakage</u> (BYS 3.4-7 and 3.4-8)

The CTS 3.3.3.b requires the isolation of two valves in each high pressure line with an inoperable pressure isolation valve (PIV). No time limit for this action is provided. STS 3.4.14 ACTIONS A.1 and A.2 provide a similar requirement, but place specific time limits on the isolation of each of the two valves. ITS 3.4.14 Action A.2 eliminates the requirement to

isolate the second of the two valves, relying on the STS alternative option of restoring the inoperable valve within the same 72 hour limit. ITS LCO 3.4.14 specifies that leakage from each PCS PIV shall be within limits and both SDC suction valve interlocks shall be OPERABLE during MODES 1, 2, or 3, or during MODE 4, except during, or transition to or from, the shutdown cooling (SDC) mode of operation.

The MODE applicability of this LCO deviates from STS 3.4.14, which requires all PIVs to be operable in MODES 1, 2, or 3, or in MODE 4 except for the SDC valves when SDC is in, or during transition to or from, the SDC mode of operation. With this deviation, the ITS eliminates all PIVs from the LCO applicability whenever the plant is in MODE 4 during, or transition to or from SDC mode of operation. In JFD #7, the licensee states that the acceptability of this change is based on the maximum pressure that can be achieved in the PCS when the SDC system is placed in service. The design of the plant piping is such that the PIVs addressed by this specification are contained in the high pressure safety injection (HPSI) system and low pressure safety injection (LPSI) system. The LPSI system valves are used for SDC. The design pressures of the HPSI system and SDC system piping are 1600 and 300 psig, respectively. Thus, when the SDC system is placed in operation, PCS pressure is well below the design pressure of the HPSI system piping and the PIVs in the LPSI system are open, providing SDC flow to the reactor. Therefore, it is not necessary to require any PIVs to be operable in MODE 4 during the SDC mode of operation, or transition to or from the SDC mode of operation. Also, the ITS applicability MODES is more restrictive to CTS 3.3.3, which specifies that prior to returning to the Power Operation Condition, all PIVs shall be functional as a pressure isolation device with valve leakage within the maximum allowable leakage limits. The staff concludes that ITS 3.4.14 mode applicability is more conservative than the CTS and current design basis, and is acceptable.

In ITS 3.4.14, when one or more flow paths with leakage from one or more PCS PIVs are not within limits, Action A requires (A.1) isolation of the high pressure portion of the affected system from the low pressure portion by use of one closed manual, deactivated automatic, or check valve in 4 hours, and (A.2) restoration of PCS PIV to within limits in 72 hours.

The Required Action A.2 deviates from STS 3.4.14, where A.2 requires either (1) isolation of the high pressure portion of the affected system from the low pressure portion by use of a second closed manual, deactivated automatic or check valve, or (2) restoration of PCS PIV to within limits in 72 hours. Action A.2 of ITS eliminates alternative option (1) for isolation of the second of the two valves.

The design of the Palisades plant piping systems, including the emergency core cooling system (ECCS), which contain PIVs is such that there are two PIVs in series with one motor-operated isolation valve in the high pressure portion of the piping. The licensee (JFD #9)

states that for the Palisades plant design, the option to isolate a second valve would make one train of ECCS inoperable, which could result in the plant outside ITS design basis if an additional ECCS injection loop is required to be isolated due to a concurrent excessive PIV leakage. Therefore, even though the option to isolate a second valve allows for continued plant operation, LCO 3.5.2, which requires two trains of ECCS to be operable in MODES 1, 2, or 3 operation, requires the restoration of the inoperable ECCS train within 72 hours, or the plant to be shutdown. As such, the appropriate action A.2 in 3.4.14 with one inoperable PIV is to restore the PIV to OPERABLE status within 72 hours, which is consistent with the allowed outage time for an inoperable ECCS train. The staff finds that ITS Required Action A.2, having the alternative operation on STS to close a second valve deleted, is acceptable.

ITS 3.5 (BYS 3.5-1)

The CTS does not contain any ECCS requirements when the reactor is not critical. The licensee proposed requirements in ITS 3.5.3, "ECCS - Shutdown" that are not consistent with the STS. This proposed change is still under staff review.

ITS 3.6.4 - Containment Pressure (BYS 3.6-1)

CTS 3.6.2 specifies that the containment internal pressure shall not exceed 3 psig except for containment leak rate tests. A Palisades Amendment Request dated March 26, 1997, proposed to change the containment internal pressure limits to ITS LCO 3.6.4 limits of ≤1.5 psig in MODES 3 and 4 and ≤1.0 in MODES 1 and 2.

Because the containment purge valves must remain closed, containment air temperature and pressure tend to rise as the plant is heated to operating temperature. The licensee stated that due to the low allowable pressure and limited containment ventilation path, this pressure rise has occasionally restricted the heatup rate and unnecessarily delayed returning the plant to power operation. The analysis demonstrated that containment design pressure and temperature would not be exceeded for a loss-of-coolant accident (LOCA) or a main steam line break (MSLB) with an initial containment pressure of 1.5 psig, provided the reactor was subcritical.

The licensee proposed revising LCO 3.6.2 to provide two containment pressure limits. A limit of 1.5 psig, to be applicable when the plant is above Cold Shutdown (i.e., when the primary coolant system (PCS) is above 210°F); and a limit of 1.0 psig, to be applicable when the plant is in Power Operation or Hot Standby (i.e., when the reactor may be critical). The proposed LCO does not apply when the plant is in Cold Shutdown (i.e., below 210°F). The containment pressure LCO is not necessary during Cold Shutdown because it is intended to assure that design containment pressure is not exceeded if a LOCA or MSLB should occur.

With the plant at Cold shutdown, neither the PCS nor the main steam system contains sufficient energy to cause containment pressurization if a piping failure should occur.

In addition, the licensee proposed adding an action statement to TS 3.6.2 to provide guidance on action to be taken if containment pressure exceeds the specified limit. The proposed action statement requries restoring containment pressure to within the limit within 1 hour or be in at least Hot Shutdown within the next 6 hours and in Cold Shutdown within the following 30 hours. The staff reviewed the licensee's proposed changes to TS 3.6.2. Since the revised limits were both more restrictive than the current TS limit, and the applicability and action statements were consistent with the STS, the staff found the proposed changes acceptable and the Amendment No. 184 was approved.

ITS 3.6.6 - Containment Cooling Systems (BYS 3.6-2)

The licensee proposed unique ACTION requirements that differ from both the CTS and STS. The proposed specification permits one or more trains of containment cooling to be inoperable provided there is at least 100% cooling capacity equivalent to a single operable containment cooling train. This approach is similar to STS 3.5.2. This proposed change is still under staff review.

ITS 3.8.4 - DC Sources - Operating (BYS 3.8-1 and BYS 3.8-2))

Completion Time for Required Action A.1 CTS 3.7.4.A requires that the following steps be taken when one required charger is inoperable: (1) place the cross-connected charger for the affected battery in service immediately and (2) restore the required charger to OPERABLE status within 7 days.

Completion Time for Required Action B.1 CTS 3.7.4.B requires that the following steps be taken when one battery is inoperable: (1) place both chargers in service for the affected battery immediately and (2) restore the battery to OPERABLE status within 24 hours.

TS 3.7.4 specifies the requirements for dc sources when the plant is in MODES 1 through 4. TS 3.7.4 Action A.1 requires the cross-connected charger(s) for the affected battery be placed in service immediately whenever one required charger is inoperable. TS 3.7.4 Action B.1 requires both chargers for the affected battery be placed in service immediately whenever one battery is inoperable. In the ITS, the inoperability of a charger and a battery are addressed in ITS 3.8.4 as Conditions A and B, respectively. Originally, the licensee proposed to change completion time for Conditions A and B from "immediately" to 8 hours. The staff informed the licensee that the completion time of 8 hours for Conditions A and B was not consistent with the intent of the STS. Moreover, a completion time of 2 hours is

sufficient to establish connection of the opposite train spare charger. Subsequently, in a letter dated May 3, 1999, the licensee revised ITS 3.8.4 Conditions A and B to change the completion time for establishing the connection of an additional spare charger when operating with an inoperable battery or battery charger from "immediately" to 2 hours. On this basis, the staff finds the proposed changes to be acceptable.

IV. STATE CONSULTATION

In accordance with the Commission's regulations, the Michigan State official was notified of the proposed issuance of the amendment. The State official for the State of Michigan had no comments.

V.ENVIRONMENTAL CONSIDERATION

Pursuant to 10 CFR 51.21, 51.32, and 51.35, an environmental assessment and finding of no significant impact was published in the *Federal Register* on _____ __, 1999 (__ FR _____) for the ITS conversion.

Accordingly, based upon the environmental assessment, the Commission has determined that issuance of this ITS conversion amendment will not have a significant effect on the quality of the human environment.

With respect to other TS changes included in the application for conversion to improved Technical Specifications, the items change requirements with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (__ FR _____). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these other TS changes included in the amendment.

VI. CONCLUSION

The improved Palisades TS provide clearer, more readily understandable requirements to ensure safe operation of the plant. The NRC staff concludes that they satisfy the guidance

in the Commission's policy statement with regard to the content of technical specifications, and conform to the model provided in NUREG-1432 with appropriate modifications for plant-specific considerations. The NRC staff further concludes that the improved Palisades TS satisfy Section 182a of the Atomic Energy Act, 10 CFR 50.36 and other applicable standards. On this basis, the NRC staff concludes that the proposed improved Palisades TS are acceptable.

The NRC staff has also reviewed the plant-specific changes to CTS as described in this evaluation. On the basis of the evaluations described herein for each of the changes, the NRC staff concludes that these changes are acceptable.

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner; (2) such activities will be conducted in compliance with the Commission's regulations; and, (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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Attachments: Table A, Administrative Changes Matrix
Table M, More Restrictive Changes Matrix
Table L, Less Restrictive Changes Matrix
Table LA, Less Restrictive - Administrative Details Matrix
Table R, Relocated Specifications Matrix

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	1.0 ADMINISTRATIVE CONTROLS		
1.0 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	1.1	1.0
1.0 A.2	The proposed change incorporates the following STS definitions which are not part of the CTS: ACTIONS LEAKAGE MODE STAGGERED TEST BASIS THERMAL POWER These definitions are adopted from the iSTS and result in no technical changes.	1.1	N/A
1.0 A.3	The CTS definitions of AXIAL OFFSET (AO) and AXIAL SHAPE INDEX (ASI) were combined in the CTS. In the ITS the definitions are separated and clarified. This is an administrative change, editorial in nature, and does not affect the technical content or operational requirements.	1.1	1.0
1.0 A.4	The CTS definition of CHANNEL CHECK is revised in the ITS. The revision is based on separate surveillance requirements specified in the ITS for each instrument channel which requires the "check" to be performed. This change is acceptable because it does not affect the technical content or operational requirements and presents the information in the ITS in a format consistent with that of the STS..	1.1	1.0
1.0 A.5	The CTS definition of CHANNEL FUNCTIONAL TEST is revised in the ITS to incorporate specific methodologies for testing different types of electrical circuits: digital, analog and bistable. These changes are administrative because they provide descriptive information only to clarify their application.	1.1	1.0
1.0 A.6	The CTS definition of CHANNEL FUNCTIONAL TEST is revised in the ITS to include an option to utilize an actual signal or the currently specified simulated signal. OPERABILITY can be adequately demonstrated in either case since the channel cannot discriminate between "actual" or "simulated." Therefore, this change is an administrative change.	1.1	1.0
1.0 A.7	The CTS definition of CONTROL RODS is deleted as a defined term in the ITS. Control rods are addressed in ITS Section 3.1, Reactivity Control and in Section 4.2.2, Control Rod Assemblies. This change results in no technical changes and therefore, is an administrative change..	3.1 4.2.2	1.0

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
1.0 A.8	The proposed change adds the defined condition MODE 5 to the ITS and deletes the CTS definition COLD SHUTDOWN. This term is used in the ITS Table 1.1-1 as the title of MODE 5 and varies only slightly from it. Any significant impact from the redefinition of COLD SHUTDOWN, that results in a "more restrictive" or "less restrictive" change is addressed in the individual specifications.	1.1 (Table 1.1-1)	1.0
1.0 A.9	The proposed change adds the defined condition MODE 4 with the title 'Hot Shutdown' to ITS Table 1.1-1. This change redefines the term HOT SHUTDOWN (see change 1.0 A.10). This is an administrative change because it only adds a new definition to this portion of the ITS; any significant impact from the redefinition of HOT SHUTDOWN that results in a "more restrictive" or "less restrictive" change is addressed in the individual specifications.	1.1 (Table 1.1-1)	N/A
1.0 A.10	The proposed change adds the defined condition MODE 3 with the title 'Hot Standby' to ITS Table1.1-1. This change redefines the term HOT STANDBY (see change 1.0 A.11). This is an administrative change because it only adds a new definition to this portion of the ITS; any significant impact from redefinition of HOT STANDBY that results in a "more restrictive" or "less restrictive" change is addressed in the individual specificatiions.	1.1 (Table 1.1-1)	1.0
1.0 A.11	The proposed change adds the defined condition MODE 2 with the title 'Startup' to ITS Table 1.1-1 (see change 1.0 A.10). This is an administrative change because it only adds a new definition to this portion of the ITS; any significant impact from the redefinition of HOT STANDBY that results in a "more restrictive" or "less restrictive" change is addressed in the individual specifications.	1.1 (Table 1.1-1)	1.0
1.0 A.12	The proposed change adds the defined condition MODE 1 with the title 'Power Operation' to ITS Table 1.1-1. The change redefines the term POWER OPERATION. Any significant impact from redefinition of POWER OPERATION that results in a "more restrictive" or "less restrictive" change is addressed in the individual specifications.	1.1 (Table 1.1-1)	1.0
1.0 A.13	The CTS definition of SHUTDOWN MARGIN is revised in the ITS to enhance and clarify the definition. This administrative change, which is editorial in nature, does not affect the technical content or operational requirements.	1.1	1.0
1.0 A.14	The CTS definition of REFUELING OPERATION is the basis for the ITS definition of CORE ALTERATIONS. The ITS definition provides clarification in application.	1.1	1.0

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
1.0 A.15	The proposed change adds the defined condition MODE 6 with the title 'Refueling' in ITS Table 1.1-1 (see changes 1.0 A.25 and A.26) and redefines the CTS term REFUELING SHUTDOWN to provide the foundation for MODE 6, Refueling. Adopting the STS definition of MODE 6 as contained in Table 1.1-1 is an administrative change.	1.1 (Table 1.1-1)	1.0
1.0 A.16	The CTS definition of LOW POWER PHYSICS TEST is revised in the ITS to provide the foundation for the ITS definition of PHYSICS TESTS.	1.1	1.0
1.0 A.17	The CTS definition of OPERABLE-OPERABILITY is revised in the ITS to clarify the required sources of electrical power. This is an administrative change because it provides descriptive information to clarify the application.	1.1	1.0
1.0 A.18	The CTS definition of QUADRANT POWER TILT is revised in the ITS to clarify that it will be expressed as a positive value.	1.1	1.0
1.0 A.19	The proposed change adds three sections to the ITS. These additions aid in the understanding and use of the new format and presentation style. These sections are: 1.2, Logical Connectors; 1.3, Completion Times; and 1.4, Frequency. These sections do not contain any requirements themselves, but provide clarification to the intended interpretations of ITS.	1.1	1.0
1.0 A.20	The CTS definition of CHANNEL CALIBRATION is revised in the ITS to clarify which components in the circuit must be calibrated. This is an administrative change because it only provides descriptive information to clarify the requirement.	1.1	1.0
1.0 A.21	The CTS definition of CHANNEL CALIBRATION is revised in the ITS to include the provisions for thermocouples and resistance temperature detectors (RDTs). This is an administrative change because it only provides descriptive information to clarify the requirements.	1.1	1.0
1.0 A.22	The proposed change relocates information from the CTS definition of LOW POWER PHYSICS TESTING, regarding special test exceptions (STEs), to various ITS LCOS. This is an administrative change which is consistent with the STS.	1.1	1.0

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
1.0 A.23	The CTS definition of TOTAL RADIAL PEAKING FACTOR is revised in the ITS to incorporate wording that was previously submitted and approved as "a revision of the PIDAL incore monitoring code," dated August 6, 1996, and the subsequent NRC Safety Evaluation, dated May 6, 1997. This change is added to the list of definitions in the STS as a plant-specific change based on the methodology in use at Palisades and the terms used in the CTS.	1.1	1.0
1.0 A.24	The CTS term RATED POWER is revised in the ITS to provide the foundation for the ITS term RATED THERMAL POWER (RTP) .	1.1	1.0
1.0 A.25	The CTS term REFUELING SHUTDOWN is revised in the ITS to provide the basis for the ITS term REFUELING BORON CONCENTRATION, in conjunction with changes 1.0 A.15 and 1.0 A.26 to incorporate MODE 6 in ITS Table 1.1-1.	1.1 (Table 1.1-1)	1.0
1.0 A.26	The proposed change revises the CTS term REFUELING SHUTDOWN and uses information in the definition regarding T_{ave} in conjunction with changes 1.0 A.15 and 1.0 A.25 to incorporate MODE 6, in ITS Table 1.1-1.	1.1 (Table 1.1-1)	1.0

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	2.0 SAFETY LIMITS (SLs)		
2.0 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	2.0	2.0
2.0 A.2	The proposed change rewords CTS 2.2 Applicability and applies the format and concept of MODES in the STS to form the foundation for ITS 2.1.2	2.1.2	2.2
2.0 A.3	The proposed change removes the requirement that upon exceeding a SL, the reactor shall not be restarted until authorized by the Commission from CTS SL 2.1.1 and SL 2.2.1. This requirement is a duplication of 10 CFR 50.36(c)(1)(A) and therefore it is not necessary to repeat the regulation in the ITS. This change is consistent with the STS as modified by TSTF-5.	N/A	2.1.1 2.2.1
2.0 A.4	The proposed change rewords CTS 2.1 Applicability and applies the format and concept of the STS MODES 1 and 2 to form the foundation of ITS 2.1 Applicability.	2.1	2.1

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.0 LCO & SR APPLICABILITY		
3.0 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent, to be consistent with the STS.	3.0	3.0
3.0 A.2	The CTS Bases for Section 3.0 was reorganized and reformatted to reflect the format and applicable content consistent with the STS. This is an administrative change, editorial in nature, and does not affect the technical content or operational requirements.	B3.0	B3.0
3.0 A.3	CTS (LCO)3.0.1 was reorganized, reworded and reformatted to provide the foundation for ITS LCO 3.0.1, reflecting the format and applicable content consistent with the STS. This change relocates the phrase, "that upon failure to meet the LCO...," to LCO 3.0.2, and replaces it with, "as provided in LCO 3.0.2 and LCO 3.0.7." These changes are administrative because relocating an exception from LCO 3.0.1 to LCO 3.0.2, and then referencing LCO 3.0.2 as an exception, has no impact on LCO 3.0.1.	LCO 3.0.1	3.0.1 3.0.2
3.0 A.4	CTS (LCO)3.0.2 was reorganized, reworded and reformatted to provide a foundation for ITS LCO 3.0.2, reflecting the format and applicable content consistent with the STS. The change deletes the first part of CTS (LCO)3.0.2 and replaces it with the phrase relocated from CTS (LCO)3.0.1 ("upon failure...") with the added phrase, "except as provided in LCO 3.0.5 and 3.0.6." This change also adds the phrases "or is no longer applicable" and "unless otherwise stated." These are administrative changes, based on accepted industry practice, conducive to the presentation of the ITS.	LCO 3.0.2	3.0.1 3.0.2
3.0 A.5	CTS (LCO)3.0.3 was reorganized, reworded and reformatted to provide a foundation for ITS LCO 3.0.3, applying the format and applicable content consistent with the STS. Wording is added to reflect that some ACTIONS direct that LCO 3.0.3 be entered. These administrative changes clarify the allowed actions.	LCO 3.0.3	3.0.3
3.0 A.6	The Applicability of ITS LCO 3.0.3 is presented in a positive manner consistent with the MODE definitions; i.e., it restates the CTS Applicability of "... not apply during cold shutdown and refueling" to the ITS Applicability of "... only applicable in MODES 1, 2, 3 and 4." This change does not result in a change of technical content, and therefore, is an administrative change.	LCO 3.0.3	3.0.3

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.0 A.7	The phrase "and the associated action requires a shutdown if they are not met within a specified time interval" is deleted from CTS (LCO) 3.0.4. This phrase is not necessary because another part of LCO 3.0.4 clarifies that entry can be made into a reactor operating condition (MODE in ITS) if actions permit continued operation for an unlimited period of time. This is an administrative change.	LCO 3.0.4	3.0.4
3.0 A.8	CTS (SR) 4.0.2, utilizing additional clarifying wording, provides the foundation for ITS SR 3.0.2. The additional wording provides information for using the SR Applicability for conventions used in the ITS and clarifies when the 25% extension applies, with respect to SR Frequencies and Required Action Completion Times.	SR 3.0.2	4.0.2
3.0 A.9	The proposed change revises the CTS to add ITS LCO 3.0.6 to provide guidance regarding the appropriate ACTIONS to be taken when the inoperability of a support system results in the inoperability of related supported systems. The function of LCO 3.0.6, when used with the Safety Function Determination Program and the Improved Specifications, clarifies ambiguities which may exist in the application of the current specifications. This is an administrative change.	LCO 3.0.6	3.0
3.0 A.10	The proposed change revises the CTS to add ITS LCO 3.0.7 to provide guidance to Special Test Exception LCOs. This Specification eliminates confusion that would otherwise exist as to which LCOs apply during performance of a special test or operation. This is an administrative change.	LCO 3.0.7	3.0
3.0 A.11	This CTS (SR) 4.0.1 proposed change adds requirements that the failure to meet the SR will constitute failure to meet the LCO. In addition, words are added concerning inoperable equipment adopted from CTS (SR) 4.0.3, and words are added to clarify that this allowance applies to variables and not just equipment. These changes and additions form the foundation for ITS SR 3.0.1. The additional wording is either the accepted application of the CTS requirement, or simply relocating an allowance from one SR Applicability rule to another to match the overall format and context improvements made in the STS.	SR 3.0.1	4.0.1 4.0.3

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.1 REACTIVITY CONTROL SYSTEMS **3.1.1 SHUTDOWN MARGIN (SDM)**		
3.1.1 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	3.1.1	3.10
3.1.1 A.2	CTS 3.10.1a and 3.10.1b specify requirements for SHUTDOWN MARGIN in terms of "...at hot shutdown and above." In the ITS, MODE 3 is essentially equivalent to the CTS "HOT SHUTDOWN" as specified in the Discussion of Changes for Section 1.0. The "...and above" portion of the CTS "...at hot shutdown and above" applies up through the CTS "HOT STANDBY" and "POWER OPERATIONS" which corresponds to the ITS MODES 1 and 2. Since the requirements of the CTS are maintained and only restructured to meet the ITS format, these changes are administrative changes.	LCO 3.1.1	3.10.1
3.1.1 A.3	CTS 3.10.1c specifies SHUTDOWN MARGIN requirements at "less than the hot shutdown condition" (below 525 F). In the ITS this corresponds to MODE 3 <525 F, MODE 4, and MODE 5. The requirements for the refueling condition (MODE 6) are addressed in ITS 3.9.1. This is an administrative change and is consistent with the intent of the STS.	LCO 3.1.1	3.10.1c
3.1.1 A.4	When at least one primary coolant pump or one shutdown cooling pump is in operation and at less than CTS Hot Shutdown (subcritical, T average >525F) with a PCS flow more than or equal to 2850 gpm, CTS 3.10.1c requires a primary coolant boron concentration qreater than the normal CTS cold shutdown boron concentration. The ITS, for operation with Tave < 525 F, require the SHUTDOWN MARGIN (SDM) to be within the limits specified in the COLR regardless of the primary system flow rate and throughout the temperature range as a cooldown occurs. This is an administrative change because the "cold shutdown boron concentration" requirement is replaced by the requirement to have SDM within the limits specified in the COLR throughout the temperature range.	LCO 3.1.1	3.10.1c
3.1.1 A.5	CTS 3.10.1b states in part that "...boration shall be immediately ..." In the ITS this statement becomes Action A and the Completion Time is 15 minutes. In the STS, the time frame of 15 minutes is used in lieu of "immediately" to specify a specific time in which an action must be started. Therefore, while a Completion Time of "15 minutes" is used in the ITS as compared to the CTS "Immediately," the effective meaning is the same. This is an administrative change.	LCO 3.1.1	3.10.1b

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.1.1 A.6	The CTS contain the requirements for SHUTDOWN MARGIN. In the ITS, the values of the required SHUTDOWN MARGIN have been moved to the COLR, an LCO statement has been added which states that the SHUTDOWN MARGIN must be within the limits specified in the COLR, and an Applicability of MODES 3, 4, and 5 is stipulated. These changes present the same information in a format consistant with the STS. As such, these changes are administrative in nature.	LCO 3.1.1	3.10.1a 3.10.1b 3.10.1c
3.1.2 REACTIVITY BALANCE			
3.1.2 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	3.1.2	4.10
3.1.2 A.2	The Bases of the CTS for this section have been completely replaced by the revised Bases that reflect the format and applicable content consistent with the STS. The revised Bases are consistent with current requirements and practice.	B 3.1.2	B 4.10
3.1.2 A.3	CTS 4.10 specifies verification of core reactivity balance following a normalization of the computed boron concentration as a function of burnup. The CTS explains that it should be done after about 10% core burnup. ITS SR 3.1.2.1 requires this verification prior to exceeding a burnup of 60 EFPD after each fuel loading. Therefore, the change to add the information on when the normalization should be performed and state it in terms of the STS wording is an administrative change for clarification.	SR 3.1.2.1 Note	4.10 B 4.10
3.1.3 MODERATOR TEMPERATURE COEFFICIENT (MTC)			
3.1.3 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS	3.1.3	3.12
3.1.3 A.2	The Bases of the CTS for this section have been completely replaced by the revised Bases that reflect the format and applicable content consistent with the STS, and consistent with current requirements and practice.	B 3.1.3	B 3.12
3.1.3 A.3	CTS 3.12 specifies the limit for the Moderator Temperature Coefficient (MTC) in terms of "RATED POWER." This is the equivalent of "RATED THERMAL POWER" as used in the ITS. This is an administrative change because no requirements have changed, and is consistent with the STS.	3.1.3	3.12

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.1.3 A.4	CTS 3.12, Moderator Temperature Coefficient (MTC) of Reactivity, does not have an explicit Applicability. ITS Applicability in MODES 1 and 2 is equivalent since measurement of MTC can only be performed when the reactor is critical. This is an administrative change, consistent with the STS.	3.1.3 Applicability	3.12
	3.1.4 CONTROL ROD ALIGNMENT		
3.1.4 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	LCO 3.1.4	3.10 3.17 4.17 4.2
3.1.4 A.2	CTS 3.10.4 does not have an explicit "Applicability" in the context used in the STS. Therefore, an Applicability of MODES 1 and 2 is added for the requirements of ITS LCO 3.1.4. Since ITS LCO 3.1.4 deals with the requirements for rod operability, alignment, rod position deviation alarm and rod position indication, an Applicability of MODES 1 and 2 is implicit since this is when the rods are withdrawn. For the rod position indication channels, CTS Table 3.17.6, Item 2 specifies an "Applicability" of "when more than one CRDM is capable of withdrawal" which is changed to MODES 1 and 2 in the ITS and addressed in Discussion of Change L.1. The addition of the Applicability of MODES 1 and 2 is an administrative change since it is implied that the rods have to be withdrawn for the protection afforded by ITS LCO 3.1.4 to be necessary.	LCO 3.1.4	3.10.4 Table 3.17.6
3.1.4 A.3	CTS 3.10.4c specifies that for misaligned rods, shutdown margin "and individual rod worth limits must be met. Individual rod worth calculations will consider the effects of xenon redistribution and reduced fuel burnup in the region of the misaligned CONTROL ROD or part-length rod." Amendment number 169 to the Palisades CTS removed the requirements for verifying for individual rod worth limits. However, since this text was inadvertently not removed from the CTS, not retaining this no longer applicable CTS requirement in the ITS is an administrative change that maintains consistency with the Palisades safety analysis.	LCO 3.1.4	3.10.4c

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.1.4 A.4	CTS 3.17.6.2 requires that for one channel of rod position indication inoperable for one or more CRDMs, "Verify that the associated rod group is within the limits of Specification 3.10 within 15 minutes after movement of any rod in that group." The ITS requires that SR 3.1.4.1 (rod position verification) be performed in the same time frame. This is an administrative change because the requirements of the CTS must still be met, but are reformatted in the ITS. .	LCO 3.1.4 Required Action A SR 3.1.4.1	3.17.6.2a
3.1.4 A.5	CTS Table 4.17.6, Item 2, Rod Position Indication, in part requires a CHANNEL CHECK every 12 hours. This requirement becomes SR 3.1.4.1 and SR 3.1.4.2 in the ITS. These surveillances in the ITS function to perform the same verifications as that intended in the CTS "CHANNEL CHECK" since the CTS definition of "CHANNEL CHECK" includes the verification that the monitored parameter is within the limits imposed by the Technical Specifications." Surveillance SR 3.1.4.1 performs this by comparing each rod to the others in its group to ensure they are within the alignment tolerances. SR 3.1.4.2 compares the primary to the secondary indication to ensure they are within the required alignment tolerances. This is an administrative change because the requirements have not changed but have been reformatted in accordance with the STS.	SR 3.1.4.1 SR 3.1.4.2	Table 4.17.6, Item 2
3.1.4 A.6	CTS 3.10.4c provides the actions to verify the hot channel factors are within their design limits, or to reduce reactor power to 75% or less and to require that the shutdown margin limits must be met. In ITS 3.1.4, it is not necessary to explicitly state an action to verify shutdown margin limits since shutdown margin is preserved by maintaining the control rods within their Power Dependent Insertion Limits as required by ITS 3.1.5, and ITS 3.1.6. The exclusion of this action in the ITS 3.1.4 is administrative in and consistent with the STS.	N/A	3.10.4c
3.1.5 SHUTDOWN AND PART-LENGTH CONTROL ROD GROUP INSERTION LIMITS			
3.1.5 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	3.1.5	3.10
3.1.5 A.2	The Bases of the CTS for this section have been completely replaced by the revised Bases that reflect the format and applicable content consistent with the STS, and consistent with current requirements and practice.	3.1.5	3.10

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.1.5 A.3	In ITS, the part-length control rods are required to be ≥128 inches. Requiring the part-length rods to be withdrawn ≥128 inches has the same effect as completely withdrawn (CTS 3.10.3) in that the rods are removed from the active region of the core. This is an administrative change and consistent with the STS.	3.1.5	3.10.3
3.1.5 A.4	CTS 3.10.3 specifies that the part-length controls will be completely withdrawn from the core except for the control rod exercises and physics test. The exception for control rod exercises is addressed as part of the 3.1.5 APPLICABILITY. The physics tests exception has been deleted in the ITS because the part-length rods are not required to be moved during PHYSICS TESTS. This is an administrative change.	3.1.5	3.10.3
3.1.5 A.5	CTS Table 4.17.6, Item 2 requires that the Rod Position Indication have a CHANNEL CHECK performed every 12 hours. ITS SR 3.1.5.1 surveillance performs this requirement by ensuring, every 12 hours, that the shutdown and part-length rods are withdrawn ≥128 inches.	3.1.5 SR 3.1.5.1	Table 4.17.6, Item 2, 3.10.6 3.10.4b 3.10.3
3.1.5 A.6	CTS 3.10.6a requires all shutdown rods to be withdrawn before any regulating rods are withdrawn. The APPLICABILITY of ITS 3.1.5 allows the regulating rods to be withdrawn up to 5 inches while allowing the shutdown rods to be withdrawn. Allowing the regulating rods to be withdrawn up to 5 inches facilitates normal operation of the control rod drive motors which are "bumped" to bring the rods off the bottom before they are withdrawn. This change is a clarification to define what "withdrawn" means with respect to the regulating rods, is consistent with CTS interpretation and practice, and is an administrative change.	3.1.5	3.10.6a
3.1.5 A.7	CTS 3.10.6a requires all the shutdown rods to be withdrawn before any regulating rods are withdrawn. CTS 3.10.6c requires the regulating rods to be inserted before the shutdown rods are inserted. By requiring all shutdown and part/length rod groups to be withdrawn to ≥128 inches before any regulating rods are inserted or withdrawn, except for rod exercising, ITS 3.1.5 LCO is equivalent to the CTS wording in 3.10.6a and 3.10.6c. Since the CTS and ITS 3.1.5 are equivalent, this is an administrative change.	3.1.5	3.10.6a 3.10.6c

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.1.5 A.8	Both CTS 3.10.7 and ITS 3.1.5 include an exception which allows a deviation from the requirement for shutdown rod limits during performance of CRDM exercises. CTS3.10.7 also contains a qualifying statement which allows the exception only for the time necessary to perform the test. ITS 3.1.5 does not contain this same qualifier since this type of detail is governed by the usage rules for the ITS. Deletion of this information is an administrative change.	3.1.5	3.10.7
3.1.5 A.9	This change adds the ITS 3.1.5 Required Actions A.1 and B.1 since the CTS does not contain actions when controls rods are not within their limits. ITS 3.1.5 establishes insertion limits for the shutdown and part-length rod groups by requiring them to be withdrawn ≥128 inches. Required Action A.1 of ITS 3.1.5 requires that any shutdown or part-length rod group that is not within its group insertion limit be restored to within limits. For rods that are also misaligned, the Conditions of ITS 3.1.4 are entered immediately. If the Required Action and associated Completion Time are not met, Required Action B.1 requires the plant to be in MODE 3 within 6 hours. This change is acceptable because the action taken when a shutdown or part-length rod exceed its insertion limit is consistent with the CTS actions.	3.1.5 Required Action A.1 Required Action B.1	N/A
	3.1.6 REGULATING ROD GROUP POSITION LIMITS		
3.1.6 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	3.1.6	3.10 4.17
3.1.6 A.2	CTS 3.10.5b.1 requires when regulating rod groups are inserted beyond their limit, they must be restored to a position within their insertion limit within two hours. This is included as ITS 3.1.6 Required Action (R.A.) A.1. Also in the ITS 3.1.6, R.A. A.2 allows, within the same two hours, an alternative ACTION to reduce THERMAL POWER to less than or equal to the fraction of the RTP allowed by the regulating rod group position and insertion limits specified in the COLR. These two actions are similar in that the insertion limits are restored to the required limit for the current power level. In either case, the regulating rod group position must be above the insertion limit for the current power level. Therefore, the addition of R.A. A.2 is an administrative change because it is an alternative to R.A. A.1.	3.1.6	3.10.5b
3.1.6 A.3	CTS Table 3.17.6, Item 18, Power Dependent Insertion Alarm, has an "Applicable Conditions" of "HOT STANDBY and above." The ITS has an Applicability of MODES 1 and 2. The CTS HOT STANDBY is operationally equivalent to the ITS, MODE 2. Therefore, the CTS "HOT STANDBY and above" is operationally equivalent to the ITS MODES 1 and 2. This is an administrative change.	LCO 3.1.6 Applicability	Table 3.17.6, Item 18

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.1.6 A.4	When one channel of Rod Group Sequence Control/Alarm is inoperable, CTS 3.17.6.13 and CTS 3.17.6.18 require that the sequence and insertion limits of CTS 3.10 be verified within 15 minutes. Under the same CONDITION, in accordance with R.A. C.1, ITS SR 3.1.6.1 requires the sequence, insertion and overlap limits be verified. Performance of this surveillance provides adequate assurance that the regulating rods are in their proper position. The requirements of the CTS are reformatted and retained in the ITS, therefore this is an administrative change which is consistent with the STS.	SR 3.1.6.1	3.17.6.13 3.17.6.18
3.1.6 A.5	CTS 3.10.7 includes an exception which allows a deviation from the requirement for regulating group insertion limits during performance of CRDM exercises for the time necessary to perform the test. The Applicability Note for ITS 3.1.6 also provides an exception from the requirement for regulating group insertion limits during performance of CRDM exercises. The CTS time qualifier governed by the usage rules for the ITS. This is an administrative change.	3.1.6	3.10.7
3.1.7 SPECIAL TEST EXCEPTIONS (STE)			
3.1.7 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	3.1.7	3.10.6 3.1.3
3.1.7 A.2	The Bases of the CTS for this section have been completely replaced by the ITS Bases that are consistent with the STS, and are consistent with current requirements and practice.	3.1.7	B 3.10 B 3.1.3
3.1.7 A.3	CTS 3.10.7 provides the allowance to deviate from the listed CTS requirements during low power physics testing. Low power physics testing is performed in ITS MODE 2, and therefore, the Applicability of the ITS LCO 3.1.7 is MODE 2. This is an administrative change.	3.1.7	3.10.7
3.1.7 A.4	CTS 3.10.7 includes a limitation when deviating from CTS during the performance of low power physics testing which only allows that deviation for the time necessary to perform the test. That time limitation allowing deviation only during performance of the test is not explicitly included in ITS 3.1.7. ITS LCO 3.0.7 specifies the usage rules which apply to Special Test Exceptions. This change is an administrative change, consistent with the STS.	3.1.7	3.10.7

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.2 POWER DISTRIBUTION LIMITS		
	3.2.1 LINEAR HEAT RATE (LHR)		
3.2.1 A.1	This change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	3.2.1	3.1 3.23
3.2.1 A.2	The Bases of the CTS for this section have been completely replaced by revised Bases that reflect the format and applicable content consistent with the STS.	B3.2.1	B3.23.1 B3.23.2 B3.23.3
3.2.1 A.3	CTS 3.23.1 Action 1 provides Required Actions when the Linear Heat Rate (LHR), as indicated by the incore alarm system, is not within the limits specified in the Core Operating Limits Report (COLR). These actions include reducing the LHR to within limits and restoring the incore readings to less than the alarm setpoints. ITS 3.2.1 Condition A includes restoring LHR to within limits, but does not restore the incore readings to less than the alarm setpoints because that is inherent when the LHR is restored to within limits. This does not change the required actions and is an administrative change.	3.2.1 Required Action A.1	3.23.1 Action 1
3.2.1 A.4	CTS 3.23.1 provides Required Actions when the LHR is being monitored by the excore monitoring system and that system is no longer appropriate for monitoring LHR because the Axial Offset (AO) is more than 0.05. CTS Required Actions are included in the ITS as ITS 3.2.1 Condition B. This is an administrative change.	3.2.1 Condition B	3.23.1 Action 2
3.2.1 A.5	ITS 3.2.1 Condition A provides an Action when the LHR is determined to not be within limits as monitored by the Excore Monitoring System. The ITS requires the same action, regardless of the method used to determine that LHR is not within limits. Therefore, the addition to the ITS of a specific Required Action for when the LHR is determined by the Excore Monitoring System to not be within limits is an administrative change.	3.2.1 Condition A	3.23.1
3.2.1 A.6	CTS 3.23.1 Action 3 indicates that when the LHR is indicated as not within the limits by the manually recorded incore readings, Action 1 shall be taken. ITS 3.2.1 Condition A includes an entry condition for when the LHR is determined to not be within limits using the manual incore readings. Because these are only different formats to require the same action, this is an Administrative change.	3.2.1 Condition A	3.23.1 Action 3

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.2.1 A.7	CTS 3.23.1 ACTION 2 contains specific details regarding the Axial Offset (AO) requirements, for using the excore monitoring system to monitor LHR. Those details are incorporated in SR 3.2.1.5 as an element of the excore detection system methodology for determining that LHR is within limits. Because those details are retained in a different format, this is an administrative change.	SR3.2.1.5	3.23 Action 2
3.2.1 A.8	CTS 4.19.1.1 provides requirements to set the incore alarms based on a measured power distribution. The Frequency for this surveillance includes an initial performance of "...prior to operation above 50% RATED POWER." This initial Frequency is revised to include "after each refueling" in ITS SR 3.2.1.2 to provide additional clarification. Because this change is consistent with interpretation and application of the CTS Frequency; therefore, this change is an administrative change.	SR3.2.1.2	4.19.1.1
3.2.2 RADIAL PEAKING FACTORS			
3.2.2 A.1	This change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	3.2.2	3.23.2
3.2.2 A.2	The Bases of the CTS for this section have been completely replaced by revised Bases that reflect the format and applicable content consistent with the STS.	B3.2.2	B3.23.2
3.2.3 QUADRANT POWER TILT			
3.2.3 A.1	This change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	3.2.3	3.23.3
3.2.3 A.2	The Bases of the CTS for this section have been completely replaced by revised Bases that reflect the format and applicable content consistent with the STS.	B3.2.3	B3.23.3
3.2.3 A.3	CTS 3.23.3 ACTIONS 1.a and 2.a require correction of T_q within 2 hours after exceeding the limit. Alternatively, the radial peaking factors may be verified to be within limits in the next 2 hours per CTS ACTIONS 1.b and 2.b. Because restoring the parameter to within limits is always an option, CTS ACTIONS 1.a and 2.a are not included in the ITS. This change is consistent with the STS and does not change the options available to the operator. This change is administrative in nature.	3.2.3	3.23.1 3.23.2

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.2.3 A.4	CTS 3.23.3 Action 1 is provided to address conditions of $T_q > 5\%$, but $\leq 10\%$. The entry condition limitation of $T_q \leq 10\%$ is unnecessary and is not retained in the ITS. In ITS 3.2.3 with $T_q \geq 0.10$, both Condition A and Condition B are entered simultaneously. In view of that simultaneous entry, the CTS Condition B requirement to determine the radial peaking factor every 8 hours is not retained in ITS Condition B because that requirement resides in ITS Condition A and ITS Condition A remains applicable. This improvement is based on the the STS format. Therefore, this change is administrative in nature.	3.2.3	3.23.3 Action 1
3.2.3 A.5	ITS SR 3.2.3.1 provides an appropriate surveillance for T_q. The CTS do not include a specific SR for T_q because it is routinely monitored by an alarm function. CTS 3.11.2 ACTION 4 and CTS 3.17.6.15 require a verification of T_q once every 12 hours when the alarm is inoperable. The ITS SR 3.2.3.1 is performed by: (1) determining that the alarm is OPERABLE and that T_q is within limits; or (2) calculation. Therefore, this is a change in format only and is an administrative change.	3.2.3	3.11.2 Action 4 3.17.6.15
3.2.4 AXIAL SHAPE INDEX			
3.2.4 A.1	This change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	3.2.4	3.1 3.1.1
3.2.4 A.2	ITS 3.2.4 requires the Axial Shape Index (ASI) to be within limits when Thermal Power is more than 25% RTP. CTS Table 3.17.6, item 16 requires the ASI alarm to be Operable above 25% Rated Power. Because the alarm is the only direct method to determine if ASI is within limits, the ITS Applicability is appropriate. This is an administrative change which clarifies the CTS Applicability.	3.2.4	3.1.1 T3.17.6 Item 16

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.3 INSTRUMENTATION **3.3.1 Reactor Protective System (RPS) Instrumentation**		
3.3.1 A.1	This change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.3.1	Table 2.3.1, 3.17.1, Table 3.17.1, 4.17, Table 4.17.1
3.3.1 A.2	CTS 3.17.1 Applicability is when there is fuel in the reactor, more than One Control Rod is capable of being withdrawn, and the PCS is less than Refueling Boron Concentration. The ITS Applicability is Modes 1 and 2, and Modes 3, 4 and 5 with more than one full length control rod capable of being withdrawn, and the PCS boron concentration is less than Refueling Boron Concentration. The ITS Applicability is equivalent to the CTS Applicability. This change only involves a difference in presentation, and is administrative.	3.3.1	3.17.1
3.3.1 A.3	A Note was added to the Actions of CTS 3.17.1 which allows separate ITS Condition entry for each RPS Function. In conjunction with ITS Specification 1.3 - "Completion Times, " this Note provides direction consistent with the CTS Actions for the RPS instrumentation. This change is consistent with STS (TSTF-178).	3.3.1	3.17.1
3.3.1 A.4	CTS 3.17.1.6b requires the reactor to be placed in a condition where the affected equipment is not required. ITS 3.3.1 Required Actions I.2.1 and I.2.2 require that no more than one control rod be capable of being withdrawn or that the PCS boron concentration be of the Refueling Boron Concentration. These actions place the plant in a condition where the affected equipment is not required. This change only involves a difference in presentation, and is administrative.	3.3.1	3.17.1.6
3.3.1 A.5	CTS Table 3.17.1 contains a "Minimum Operable Channels" column. This column is deleted in the ITS because the Actions in the ITS are based on the number of channels inoperable. The total number of channels required to be Operable is unchanged from CTS.. This change only involves a change in presentation format, and is administrative. This change is consistent with the presentation format in STS.	Table 3.3.1-1	Table 3.17.1

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.3.1 A.6	CTS Table 3.17.1 Footnote (a) requires two Operable wide range nuclear instrument channels if the Zero Power Mode (ZPM) bypass is used. The automatic ZPM bypass removal function has been specified as Function 12 in Table 3.3.1-1. ITS Condition D provides guidance when bypass channel(s) are inoperable, allowing indefinite continued operation with an inoperable ZPM bypass removal channel only if the ZPM bypass is not used. These two ITS features are the equivalent of the CTS footnote (a) requirement. Since the ITS requirements are equivalent to the CTS requirements, this change is administrative.	3.3.1 Table 3.3.1-1	3.17.1 Table 3.17.1
3.3.1 A.7	CTS Table 3.17.1 Footnote (b) provides a restriction that the low power bypass (i.e., Zero Power Mode Bypass) cannot be enabled unless the Shutdown Boron Concentration for the COLD SHUTDOWN condition is achieved. This provision is not included in the associated ITS Table 3.3.1-1 Footnote (b) since the SDM requirements are met through ITS Section 3.1. This change results from moving requirements from one Technical Specification to another, and therefore, is administrative. This change is consistent with STS.	3.3.1 3.1.1	Table 3.17.1
3.3.1 A.8	CTS Table 4.17.1 Footnotes (b) and (c) require, a calibration of the Variable High Power trip Function channels (excore nuclear power and ΔT power) with a heat balance, and calibration of the excore power channels with a test signal. In ITS, a requirement is added in SR 3.3.1.3 to adjust the instrumentation if the absolute difference between the instrument readings and the results of the heat balance exceeds 1.5%. That requirement corresponds to "the necessary range and accuracy" requirement of the CTSChannel Calibration definition, and does not constitute a change in requirements. This change is administrative, and is consistent with STS.	SR 3.3.1.3	Table 3.17.1, Footnotes b&c
3.3.1 A.9	CTS 2.3 specifies the requirements for the RPS Limiting Safety System Settings. The Applicability of this Specification is when the associated RPS channels are required to be Operable by Specification 3.17.1. In addition, CTS 2.3.1 specifies that if the RPS instrument setting is not within the allowable settings of Table 2.3.1, the instrument must be declared inoperable and complete corrective action as directed by Specification 3.17.1. In the ITS these values are Allowable Values listed in ITS Table 3.3.1-1 and the ITS 3.3.1 Actions provide identical requirements. This change moves requirements from one Technical Specification to another, and therefore, is administrative. This change is consistent with STS.	3.3.1	2.3.1

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.3.1 A.10	CTS Table 2.3.1 provides the RPS Trip Setting Limits with four Primary Coolant Pumps (PCPs) operating and with three PCPs operating. In ITS Table 3.3.1-1 the three PCP settings have been omitted. With less than four PCPs operating, the Low Primary Coolant System Flow Trip will be actuated, ensuring all full length control rods are inserted. In addition, ITS LCO 3.4.4 requires the plant to be placed in Mode 3 if less than four PCPs are operating. Since three pump operation will no longer be allowed (due to the more restrictive change in Section 3.4) deletion of these alternative settings, which can no longer be used, is an administrative change.	Table 3.3.1-1	Table 2.3.1
3.3.1 A.11	CTS 4.18.2.1b requires a surveillance to compare the excore AO (ASI) to the incore AO and calibration of the excore channel if the difference exceeds 0.02. ITS includes this requirement as SR 3.3.1.4. This change is administrative since it only provides a different format for identifying the requirements.	SR 3.3.1.4	SR 4.18.2.1b
3.3.1 A.12	CTS Table 4.17.1, item 16, requires verification of control room temperature. This CTS requirement is reflected in ITS SR 3.3.1.2. This change is administrative since it only provides a different format for identifying the requirements.	SR 3.3.1.2	Table 4.17.1, item 16
3.3.2 Reactor Protective System (RPS) Logic and Trip Initiation			
3.3.2 A.1	This change reformats, renumbers and rewords the CTS with no change in meaning or intent to be consistent with STS.	3.3.2	3.17.1 4.17.1
3.3.2 A.2	This change revises the way the RPS Applicability is presented. CTS 3.17.1 Applicability is when there is fuel in the reactor, more than one Control Rod is capable of being withdrawn, and the PCS is less than Refueling Boron Concentration. The ITS Applicability is Modes 1 and 2, and Modes 3, 4 and 5 with more than one full length control rod capable of being withdrawn, and the PCS boron concentration is less than Refueling Boron Concentration. The ITS APPLICABILITY is equivalent to the CTS Applicability. This change only involves a difference in presentation, and is administrative.	3.3.2	3.17.1

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.3.2 A.3	CTS 3.17.1.6b requires the reactor to be placed in a condition where the affected equipment is not required. ITS 3.3.2 Required Actions E.1 and E.2 require that no more than one control rod be capable of being withdrawn or that the PCS boron concentration be at the Refueling Boron Concentration. These actions place the plant in a condition where the affected equipment is not required. Since this change only provides more specific but equivalent actions to be taken, it is administrative.	3.3.2, RA E.1 & E.2	3.17.1.6b
3.3.2 A.4	CTS Table 3.17.1 contains a "Minimum Operable Channels" column. This column is deleted in the ITS because the Actions in the ITS are based on the number of channels inoperable. The total number of channels required to be Operable is unchanged from CTS. This change only involves a change in presentation format, and is administrative. This change is consistent with the presentation format in STS.	3.3.2	Table 3.17.1
3.3.2 A.5	CTS 4.17 requires that the surveillance testing of the logic and control channels listed in CTS Table 3.17.1 be performed as specified in CTS Table 4.17.1. This CTS 4.17 reference is not used in ITS 3.3.2 since the requirements have been placed in the LCO and associated SRs. Since this change only involves a difference in presentation between the CTS and the ITS, it is administrative. This change is consistent with STS.	3.3.2	4.17

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.3.3 Engineered Safety Features (ESF) Instrumentation		
3.3.3 A.1	This change reformats, renumbers and rewords the CTS with no change in meaning or	3.3.3	3.17.2 3.17.3 4.17.2 4.17.3
3.3.3 A.2	The required number of channels are specified in CTS Tables 3.17.2 and 3.17.3, respectively. ITS LCO 3.3.3 specifies the requirement that four instrument channels are required to be Operable. The "Required Channels" column of CTS Table 3.17.2 and 3.17.3 is not included in ITS Table 3.3.3-1. Since the number of channels in the CTS and ITS are identical this change is editorial in nature and is therefore administrative. This change is consistent with STS.	3.3.3	3.17.2 3.17.3
3.3.3 A.3	CTS 3.17.2 requires the instrumentation channels to be Operable when the PCS is above 300 degrees except as allowed by the permissible operational bypasses. The Applicability of ITS 3.3.3 is "In accordance with Table 3.3.3-1." The ITS Applicability for the Functions associated with CTS 3.17.2 is Modes 1, 2 and 3. Which are applicable at ≥ 300°. Therefore the Applicability in the CTS and ITS are identical . Therefore, this change is administrative.	3.3.3	3.17.2
3.3.3 A.4	A Note was added to the Actions of CTS 3.17.2 and 3.17.3 which allows separate Condition entry for each ESF function. In conjunction with ITS Specification 1.3 - "Completion Times, " this Note provides direction consistent with the intent of the existing Actions for the ESF instrumentation. This change is consistent with STS.	3.3.3	3.17.2 3.17.3
3.3.3 A.5	CTS 3.17.3 requires the instrumentation channels to be Operable when the PCS is above Cold Shutdown except as allowed by the permissible operations by passes. The ITS Applicability associated with CTS Table 3.17.3 Functions is MODES 1, 2, 3, and 4. These changes with respect to the Applicability are above Cold Shutdown and are therefore administrative.	3.3.3	3.17.3

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.3.3 A.6	CTS 3.16 includes the Engineered Safety Features (ESF) System setting limits. The CTS 3.16 Applicability is when the associated ESF or Isolation Function instrumentation is required to be Operable by Specification 3.17.2 or 3.17.3. CTS 3.16.1 requires that the instrumentation be declared inoperable when the settings are not within the allowable values of Table 3.16 and complete the corrective action as directed by Specification 3.17. ITS 3.3.3 includes all of these requirements in the associated LCO and Actions. Therefore, this cross reference to CTS 3.17 is not necessary and is deleted. Since this change is simply a change in format and therefor is administrative.	3.3.3	3.16
3.3.3 A.7	CTS Table 4.17.2, item 2.c, requires both a Channel Functional Test and a Channel Calibration to be performed on the SIRWT Level Switches every 18 months. In the ITS, a Channel Calibration (SR 3.3.3.3) is only required because a Channel Calibration includes a Channel Functional Test. This change is administrative.	SR 3.3.3.3	4.17.2, item 2c
3.3.4 Engineered Safety Features (ESF) Logic and Manual Initiation			
3.3.4 A.1	This change reformats, renumbers and rewords the CTS with no change in meaning or intent to be consistent with STS.	3.3.4	3.17.2 3.17.3 4.17.2 4.17.3
3.3.4 A.2	CTS 3.17.2 requires the instrumentation channels to be Operable when the PCS is above 300 degrees except as allowed by the permissible operational bypasses. In the ITS LCO, operational bypasses are specifically addressed. The Applicability of ITS LCO 3.3.4 is "According to Table 3.3.4-1." The ITS Applicability for the Functions associated with CTS 3.17.2 is Modes 1, 2 and 3 which are applicable at ≥ 300°. Therefore the Applicability in the CTS and ITS are identical. This change in format to identify the Applicability of the Functions is equivalent to the current requirements and is administrative.	3.3.4	3.17.2
3.3.4 A.4	A Note was added to the Actions of CTS 3.17.2 and 3.17.3 which allows separate Condition entry for each Function. In conjunction with the Specification 1.3 - "Completion Times," this Note provides direction consistent with the intent of the existing Actions for the ESF instrumentation. This change is consistent with STS.	3.3.4	3.17.2 3.17.3

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.3.4 A.5	CTS 3.17.3 requires the instrumentation channels to Be Operable when above Cold Shutdown except as allowed by the permissible operations bypasses. The operational bypasses are specifically addressed in the ITS. The differences in the applicability between the CTS and ITS are negligible. These changes with respect to the Applicability are above Cold Shutdown and are therefore administrative.	3.3.4	3.17.3
3.3.4 A.6	The requirements of CTS Table 3.17.3 applicable to Function 4 (SGLP) are revised to incorporate Footnote (c), which states that manual initiation may be achieved by individual component controls. This footnote is equivalent to the CTS entry requiring "1 set [of controls]/train. This change is administrative.	3.3.4	3.17.2 3.17.3
3.3..4 A7	The requirements of CTS Table 4.17.2 have been revised by adding a Note to the 92 day Channel Functional Test which states that testing of the Actuation Logic shall include verification of the proper operation of each initiation relay. This change is consistent with existing practices for ESF logic testing and therefore is administrative.	SR 3.3.4.2	Table 3.17.2
3.3.6 Refueling Containment High Radiation (CHR) Instrumentation			
3.3.6 A.1	This change reformats, renumbers and rewords the CTS with no change in meaning in meaning or intent to be consistent with STS.	3.3.6	3.8 Table 3.17.6, item 20
3.3.6 A.2	CTS 3.8 and 3.8.1 and Table 3.17.6 Function 20 (Containment Refueling Radiation Monitor) are applicable during Refueling Operations when irradiated fuel is in the containment. The Applicability of ITS 3.3.6, "Refueling Containment High Radiation (CHR) Instrumentation," is "during Core Alterations" and "during movement of irradiated fuel assemblies within containment." Both the CTS and ITS address the condition where during operation, there is potential for a fuel handling accident since fuel storage and handling occur in containment. As such, this change in wording is administrative.	3.3.6	3.8 Table 3.17.6, item 20

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.3.6 A.3	CTS 3.8.1c and Table 3.17.6, #20 require two radiation monitors to be Operable during refueling operations; ITS LCO 3.3.6 requires two radiation monitors to be Operable during core alterations and movement of irradiated fuel. This change is a change in format placing the requirements of the CTS in the corresponding ITS LCO and stating that these operations constitute refueling operations. This change is administrative.	3.3.6	3.8.1c Table 3.17.6, item 20
3.3.6 A.4	The CTS Bases have been completely replaced by revised Bases that reflect the format and applicable content consistent with STS. This change is administrative.	3.3.6 Bases	3.8& 3.17.6#20 Bases
3.3.6 A.5	CTS Table 3.17.6, item 20, Footnote (a), states that Specifications 3.0.4 and 4.0.4 are not applicable. ITS Specifications 3.0.4 and 4.0.4 (ITS SR 3.0.4) only apply in MODES 1, 2, 3 and 4; these footnotes have been deleted. This change is administrative.	3.3.6	3.17.6, item 20
3.3.7 Post Accident Monitoring (PAM) Instrumentation			
3.3.7 A.1	This change reformats, renumbers and rewords the CTS with no change in meaning or intent to be consistent with STS.	3.3.7	3.17.4
3.3.7 A.2	CTS 3.17.4 is applicable when the PCS temperature is > 300°F. ITS 3.3.7 is applicable in Modes 1, 2, and 3. In accordance with ITS Table 1.1-1 average reactor coolant temperature must be > 300°F while in MODES 1, 2, and 3 which are applicable at ≥ 300°. As such, this change is administrative. This change is consistent with STS.	3.3.7	17.4
3.3.7 A.3	A Note was added to CTS 3.17.4 Actions which allows separate Condition entry for each function. In conjunction with ITS Specification 1.3 - "Completion Times," this Note provides direction consistent with the intent of the existing Actions. This change is consistent with STS.	3.3.7	3.17.4
3.3.8 Alternate Shutdown System			
3.3.8 A.1	This change reformats, renumbers and rewords the CTS with no change in meaning or intent to be consistent with STS.	3.3.8	3.17.5
3.3.8 A.2	CTS 3.17.5 is applicable when the PCS temperature is > 300°F. ITS 3.3.8 is applicable in Modes 1, 2, and 3. In accordance with ITS Table 1.1-1 average reactor coolant temperature must be > 300°F while in MODES 1, 2, and 3 which are applicable at ≥ 300°. As such, this change is administrative. This change is consistent with STS.	3.3.8	3.17.5

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.3.8 A.3	A Note was added to CTS 3.17.5 Actions which allows separate Condition entry for each function. In conjunction with ITS Specification 1.3 - "Completion Times," this Note provides direction consistent with the intent of the existing Actions for the Alternate Shutdown System. As such, this change is administrative. This change is consistent with STS.	3.3.8	3.17.5
3.3.8 A.4	CTS Table 3.17.5 requires transfer switches, Items 19 and 20, to be Operable. ITS requires these switches to be Operable by SR 3.3.8.2, which requires verification that each Alternate Shutdown System control circuit and transfer switch is capable of performing its intended function every 18 months. As such, this change is administrative. This change is consistent with STS.	Table 3.3.8-1 SR 3.3.8.2	Table 3.17.5
3.3.8 A.5	CTS Table 4.17.5 requires an 18 month Channel Functional Test and Channel Calibration for #s 13, 14, and 15, and an 18 Month Channel Check for #s 13 and 14. ITS SR 3.3.8.3 18 month Channel Calibration includes these CTS requirements. Since a Channel Calibration includes a Channel Functional Test and a Channel Calibration is a comprehensive quantitative loss of channel operation as compared to the qualitative testing specified by a channel check. As such, this change is administrative. This change is consistent with STS.	3.3.8.3	Table 4.17.5, #s 13, 14, 15
3.3.9 Neutron Flux Monitoring Channels			
3.3.9 A.1	This change reformats, renumbers and rewords the CTS with no change in meaning or ntent to be consistent with STS.	3.3.9	3.17.6, item 1
3.3.9 A.2	With less than two Operable channels of nuclear instrumentation, CTS 3.17.6.1b requires the plant be placed in Hot Shutdown within 15 minutes. ITS 3.3.9 does not include this requirement. Since the applicability of LCO 3.3.9 is "Modes 3, 4, and 5" the requirements of CTS Action 3.17.6.1b would already be met. This change is consistent with STS.	3.3.9	3.17.6.1b
3.3.9 A.3	The CTS Applicability for Neutron Flux Monitoring is "below 10-4% Rated Power with fuel in the reactor." The ITS 3.3.9 Applicability Is Modes 3, 4 and 5. With the reactor "below 10-4 % Rated Power", the plant must be in Mode 2, 3, 4, 5, or 6. This LCO, with ITS LCOs 3.3.1 and 3.9.2, require the Neutron Flux Monitoring channels to be Operable whenever reactor power is below 10-4% RTP. This change is administrative.	3.3.9	3.17.6, item 1

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.3.9 A.4	CTS Table 4.17.6 item 1 (Neutron Flux Monitoring) requires a Channel Functional Test once within 7 days prior to each reactor startup. This requirement is not included in the ITS 3.3.9 for this Function since it is retained, for the High Startup Rate Function in ITS 3.3.1, "Reactor Protective System (RPS) Instrumentation." which utilizes these wide range instrumentation channels. This change is administrative and is consistent with STS.	3.3.9	4.17.6, item 1(a)
3.3.10 Engineered Safeguards Room Ventilation (ESRV) Instrumentation			
3.3.10 A.1	This change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.3.10	3.16 Item 7; 3.17.3 item #4; 4.17.3 item #4
3.3.10 A.2	A Note was added which allows separate ITS Condition entry for each ESRV Monitor. In conjunction with ITS Specification 1.3 - "Completion Times, " this Note provides direction consistent with the CTS Actions for the RPS instrumentation. This change is consistent with STS.	3.3.10 Actions	3.17.3.4

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.4 PRIMARY COOLANT SYSTEM (PCS) 3.4.1 PCS Pressure, Temperature, and Flow Departure from Nucleate Boiling (DNB) Limits			
3.4.1 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.4.1	3.1.1 4.15
3.4.1 A.2	CTS 3.1.1c does not explicitly state a required mode or condition for primary system flow rates. However, since CTS 4.15 does require that the primary system flow rate be verified within the first 31 days of rated power operation, it is a reasonable conclusion that the applicable mode for CTS 3.1.1c is during Power Operations. ITS 4.4.1 Applicability is MODE 1. The addition of a specific Mode to the applicability is consistent with STS..	3.4.1c	3.1.1c 4.15
3.4.1 A.3	The proposed change revises the Applicability requirement of CTS 3.1.1g from "at steady state power operation" to MODE 1 for ITS 3.4.1b. Specifying the Mode of applicability is consistent with STS.	3.4.1b	3.1.1g
3.4.1 A.4	CTS 3.1.1f does not explicitly state a required applicability mode for primary system pressure. The FSAR states that Loss of External Load is the limiting event that challenges PCS pressure limits and that event is analyzed at full power. The intent of CTS 3.1.1f is to establish a limit which is applicable during Power Operations. ITS 3.4.1 applicability is MODE 1. The addition of this APPLICABILITY statement is consistent with STS.	3.4.1a	3.1.1f
3.4.1 A.5	The Bases of the CTS for this section have been completely replaced by the revised Bases that reflect the format and applicable content consistent with STS.	B3.4.1	B4.15
3.4.2 PCS Minimum Temperature for Criticality			
3.4.2 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS	3.4.2	3.1.3
3.4.2 A.2	CTS 3.1.3a require PCS temperature to be $\leq$ 525°F when the reactor is made critical. ITS LCO 3.4.2 is applicable in MODE 1 and MODE 2 with $K_{eff} \geq 1.0$. The plant condition specified for CTS 3.1.3a equivalent to the plant conditions for ITS 3.4.2. The proposed change is acceptable because it does not affect the technical content or operational requirements and presents the information in the ITS in a format consistent with STS.	3.4.2	3.1.3a

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.4.2 A.3	The proposed change reflects the correlation between the existing CTS 3.1.3c statement of (at < 525°F) "... the reactor shall be subcritical by an amount equal to or greater than the potential reactivity insertion due to depressurization," and the ITS 3.4.2 Applicability of MODE 1, and MODE 2 with $K_{eff} \geq 1.0$. The CTS Bases clarifies that "the maximum potential reactivity insertion that could result from depressurizing the coolant from 2100 psia to saturation pressure at 525°F is 0.1% Delta p." If the PCS temperature is less than 525°F, the CTS requires K_{eff} to be $\leq$ 0.999, and the ITS requires K_{eff} to be $\leq$ 0.9999. This change is acceptable because the difference in the amount of reactivity by which the reactor is shutdown when the PCS temperature is < 525°F is negligible from both a practical stand point as well as from a safety significance stand point.	3.4.2	3.1.3c
3.4.2 A.4	The Bases of the CTS for this section have been completely replaced by the revised Bases that reflect the format and applicable content consistent with STS.	B3.4.2	B3.1.3
3.4.3 PCS Pressure and Temperature (P/T) Limits			
3.4.3 A.1	The proposed change reformats, renumbers and rewords the CTS requirements with no change of intent to be consistent with STS.	3.4.3 Fig. 3.4.3-1 Fig. 3.4.3-2	3.1.2 Fig. 3-1 Fig. 3-2
3.4.3 A.2	CTS 3.1.2, 3.1.2a and 3.1.2c specify requirements for PCS pressure, PCS temperature, and PCS heatup and cooldown rates. ITS LCO 3.4.3, Figure 3.4.3-1 and Figure 3.4.3-2 specify the same requirements in a format consistent with the STS.	LCO 3.4.3 Fig. 3.4.3-1 Fig. 3.4.3-2	3.1.2 3.1.2a 3.1.2c
3.4.4 PCS Loops - MODES 1 and 2			
3.4.4 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.4.4	3.1.1
3.4.4 A.3	CTS 3.1.1b requires four PCPs in operation above Hot Shutdown. This is the same as the ITS requirement to have two PCP loops in operation in MODES 1 and 2. This is an administrative change consistent with the STS.	3.4.4	3.1.1b
3.4.5 PCS Loops - MODE 3			
3.4.5 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.4.5	3.1.1

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.4.5 A.2	The proposed change reformats and rewords the CTS 3.1.1d requirements and includes them in ITS LCO 3.4.5. The requirements of CTS 3.1.1d and the requirements of ITS LCO 3.4.5 are the same; the CTS and ITS require both SGs to be Operable. This change is an administrative change.	LCO 3.4.5	3.1.1d
3.4.5 A.3	CTS 3.1.1a and 3.1.1d contain requirements for the primary coolant pumps and steam generators to operate above Cold Shutdown and above 300°F. ITS 3.4.5 requires their operation in MODE 3 which is included within the CTS requirements. The applicability of CTS 3.1.1a and CTS 3.1.1d are inclusive of the Applicability of ITS 3.4.5, this is an acceptable administrative change in a format consistent with STS.	LCO 3.4.5 Applicability	3.1.1a 3.1.1d
3.4.6 PCS Loops - MODE 4			
3.4.6 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.4.6	3.1.1 3.1.9.1 3.10.1 4.2
3.4.6 A.2	The requirements of CTS 3.1.1a and 3.1.9.1, when PCS temperature is > 200°F and ≤ 300°F are included in ITS 3.4.6 in a format consistent with STS.	N/A	3.1.1a
3.4.6 A.3	CTS 3.1.9.1 applicability specifies a PCS temperature of > 200°F and ≤ 300°F. ITS 3.4.6 applicability is MODE 4 and defines MODE 4, in part, by an average primary coolant temperature of > 200°F and < 300°F. The actual difference between the CTS and ITS (less than 1°F) is insignificant. This is an administrative change consistent with STS.	3.4.6 Applicability	3.1.9.1 Applic.
3.4.6 A.4	CTS 3.1.1i contains a restriction on the simultaneous operation of primary coolant pump P-50A and P-50B. In ITS 3.4.6 this same restriction applies; however, the phrase "when the PCS cold leg temperature is < 300°F" has been deleted because it is redundant to the applicability. This is an administrative change.	3.4.6 Applicability	3.1.1i
3.4.6 A.6	The PCP starting limitations specified in CTS 3.1.1h have been incorporated into ITS 3.4.6 with the exception of limit (1) which states that "PCS cold leg temperature (T_c) is > 430°F." The inclusion of this starting restriction is not applicable in MODE 4 because the maximum allowable temperature in MODE 4 is 300°F. This is an administrative change.	LCO 3.4.6 Note 2	3.1.1h

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.4.6 A.7	CTS 4.2, Table 4.2.2 item 14.c does not provide an actual loop flow rate. ITS SR 3.4.6.1 does provide an actual flow rate. This is an administrative change consistent with the STS.	SR 3.4.6.1	Table 4.2.2 Item 14c
	3.4.7 PCS Loops - MODE 5, Loops Filled		
3.4.7 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.4.7	3.1.1 3.1.9.2 3.10.1 Table 4.2.2 Item 14
3.4.7 A.2	The requirements of CTS 3.1.1a and CTS 3.1.9.2, when PCS temperature is < 200°F, are included in ITS 3.4.7 in a format consistent with STS. This is an administrative change.	N/A	3.1.1a
3.4.7 A.3	CTS 3.1.1h provides specific PCP starting limitations. ITS 3.4.7 contains those limitations except the one which states that the PCS cold leg temperature (T_c) has to be more than 430°F. The inclusion of this starting restriction is not applicable in MODE 5 because the maximum allowable temperature in MODE 5 is 200°F. This is an administrative change.	LCO 3.4.7 Note 3	3.1.1h
3.4.7 A.4	CTS 3.1.9.2 applies when the PCS temperature is < 200°F. ITS 3.4.7 applies in MODE 5 which is defined, in part, by an average primary coolant temperature of ≤ 200°F. The actual difference between the CTS and ITS (less than 1°F) is insignificant. This is an administrative change, consistent with the STS.	3.4.7 Applic.	3.1.9.2 Applic.
3.4.7 A.5	CTS 3.1.9.2 allows PCS flow through the core to be stopped for one hour and one or both Shutdown Cooling trains to be inoperable for testing or maintenance for two hours if the core outlet temperature stays ≤ 200°F. ITS LCO 3.4.7 allows the same flow stoppage and Shutdown Cooling inoperability if the core outlet temperature is ≤ 202°F. The 2°F difference between the CTS requirement (≤ 200°F) and the ITS requirement (≤ 202°F) is insignificant. This is an administrative change, consistent with the STS.	LCO 3.4.7 Note 1.b	3.1.9.1 Except. 1.b & 2.b

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.4.7 A.7	CTS 4.2, Table 4.2.2 item 14.c requires one coolant loop or train to be in operation but does not require a specific flow rate. ITS SR 3.4.7.1 requires one shutdown cooling train in operation with a specific flow rate. This is an administrative change in format, consistent with the STS.	SR 3.4.7.1	Table 4.2.2 Item 14c
	3.4.8 PCS Loops - MODE 5, Loops Not Filled		
3.4.8 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with NUREG-1432.		
3.4.8 A.2	CTS 3.1.9.3, Exceptions 1 restriction "b"requires that core outlet temperature stays ≤ 200°F. ITS 3.4.8 requires the core outlet temperature to be maintained at 202°F. The difference between the CTS requirement (≤ 200°F) and the ITS requirement (≤ 202°F) is insignificant. This is an administrative change consistent with the STS.	LCO 3.4.8 Note 1.a	3.1.9.3 Exception 1.b
3.4.8 A.3	CTS 3.1.9.3 Exception 1, allows stoppage of all flow through the reactor core if, in part, two SDC trains are Operable. ITS 3.4.8 does not contain this same restriction when all flow through the reactor core is stopped because ITS LCO 3.4.8 requires two trains of SDC to be Operable whenever the plant is in MODE 5 with the PCS loops not filled. This is an administrative change that does not alter the CTS requirements.	N/A	3.1.9.3 Exception 1.c
3.4.8 A.4	CTS 3.1.9.3 applicability specifies a PCS temperature of < 200°F, ITS 3.4.8 applicability is, in part, MODE 5, which is defined by an average primary coolant temperature of ≤ 200°F. This change is acceptable because the actual difference between the CTS and ITS (1°F) is insignificant. This is an administrative change.	3.4.8 Applic.	3.1.9.3 Applic.
3.4.8 A.5	CTS 3.10.1c.1.(a) requires that a shutdown margin of ≥ 3.5% be established whenever the primary system flow rate is < 2810 gpm. ITS 3.4.8 does not explicitly state this requirement because ITS 3.1.1 requires the shutdown margin to be ≥ 3.5% any time the plant is in MODE 5. This is an administrative change.	N/A	3.10.1c.1.(a)
3.4.8 A.6	CTS 3.10.1c.1.(b), requires assurance that two of the three charging pumps are electrically disabled. ITS 3.4.8 requires two of the three charging pumps to be incapable of reducing the boron concentration in the PCS below the minimum value necessary to maintain the required Shutdown Margin. Both the CTS and ITS limit the amount of unborated water which could be injected into the PCS to the capacity of one charging pump.	LCO 3.4.8	3.10.1c.1.(b)

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.4.8 A.7	CTS 4.2, Table 4.2.2 item 14.c requires verification of PCS flow every 12 hours. ITS SR 3.4.8.1 and ITS SR 3.4.8.2 require verification at the same frequency. This is an administrative change in format.	SR 3.4.8.1 SR 3.4.8.2	Table 4.2.2 Item 14c
	3.4.9 Pressurizer		
3.4.9 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.4.9	3.1.1 3.1.3
3.4.9 A.2	The proposed change restates the CTS 3.1.1j requirement that "...the PCS shall not be heated or maintained above 300°F unless....." as the Applicability of ITS LCO 3.4.9. MODE 3 is defined, in part, as an average temperature ≥ 300°F. The difference between the CTS requirement (≤ 300°F) and the ITS requirement (< 300°F) is insignificant and has no relative impact on the health and safety of the public or plant.	LCO 3.4.9 Applicability	3.1.1j
3.4.9 A.3	The proposed change deletes the CTS 3.1.3d and 3.1.3e requirements regarding pressurizer water level, as these requirements are presented in a different structure in the ITS. Although the structure of the ITS is different from that of the CTS, the requirements of the ITS encompass the intended requirements of CTS 3.1.3d and CTS 3.1.3e. This change is consistent with STS.	N/A	3.1.3d 3.1.3e
	3.4.10 Pressurizer Safety Valves		
3.4.10 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.4.10	3.1.7 4.2 Table 4.2.2 Item 3
3.4.10 A.2	The proposed change rewords the CTS 3.1.7.1 requirements to the more explicit format of the ITS, to form a foundation for ITS LCO 3.4.10. Although the wording of the ITS is slightly different from the CTS, the requirements of the CTS have remained unchanged, and has no relative impact on the health and safety of the public or plant.	LCO 3.4.10	3.1.7.1

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.4.11 Pressurizer Power Operated Relief Valves (PORVs)		
3.4.11 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.4.11	3.1.8 4.1
3.4.11 A.2	The requirements of CTS 3.1.8.1 state that "...two PORV flow paths, each consisting of an Operable PORV and an Operable block valve, shall be Operable." In ITS 3.4.11, the phrase "PORV flow path" is not used and reference is made directly to the PORVs and PORV block valves. This change is administrative because it only changes the presentation of the requirement and does not alter the original intent of the CTS. This change is consistent with STS.	3.4.11	3.1.8.1
3.4.11 A.3	The proposed change restates CTS 3.1.8.1 reference to "CLOSE position," to the ITS 3.4.11 terminology of "manual control." Since placing the hand switch in the close position prevents the PORV from automatically opening in the event of a PCS overpressurization, placing a PORV in the close position in the CTS is equivalent to placing a PORV in manual in the ITS.	3.4.11	3.1.8.1
3.4.11 A.4	The proposed change reflects the correlation between the CTS 3.1.8.1 Action c statement of "HOT SHUTDOWN" and the ITS RA3.4.11 E.1 "MODE 3." Since the ITS definition of MODE 3 encompasses the CTS definition of Hot Shutdown, the actual requirement of the CTS (i.e., place the plant in Hot Shutdown) has remained unchanged and only the temperature portion of the definition for Hot Shutdown has changed.	3.4.11 Required Action E.1	3.1.8.1 Action c
3.4.11 A.5	The proposed change adds the ITS 3.4.11 Actions Note 1 and the requirements in CTS 3.1.8.1 Actions, that allows separate condition entry for each PORV. This Note provides explicit instructions for proper application and compliance of the Actions in the ITS. In conjunction with Specification 1.3, "Completion Times," this Note provides directions consistent with the intent of the CTS (i.e., component based Actions versus conditional based actions). This change is consistent with STS.	3.4.11 Actions Note 1	3.1.8.1 Actions
3.4.11 A.6	The proposed change omits from the ITS, the CTS 4.1 (2) requirement to perform a Channel Calibration of the PORV actuation channel at least every 18 months. The intent of this change is to disassociate the performance of a Channel Calibration with automatic PORVs actuation, the change does not result in an actual reduction of CTS requirements since a Channel Calibration of the pressurizer pressure channels continues to be required by ITS 3.3.1. Therefore, this is an administrative change.	N/A	4.1 (2)

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.4.11 A.7	The proposed change restates the CTS 4.1 (3)a term "the plant above Cold Shutdown" to form a foundation for ITS SR 3.4.11.2 term "PCS average temperature >200°F." The value of 200°F represents the transition temperature from MODE 5 (cold shutdown) to MODE 4. Stipulating a temperature value rather than stating "cold shutdown" is consistent with the presentation of information in the ITS.	SR 3.4.11.2	4.1 (3)a
3.4.11 A.8	The proposed change restates the CTS 4.1 (3)b requirement of "prior to heatup from Cold Shutdown" to form a foundation for ITS SR 3.4.11.1 Frequency of "prior to entering MODE 4 from MODE 5." The Frequency of SR 3.4.11.1 restates the same frequency as contained in CTS 4.1 (3)b, but is presented in a format consistent with similar type frequencies specified in the ITS. Since there is no change in requirements from the CTS to the ITS, this change is administrative, consistent with STS.	SR 3.4.11.1	4.1 (3)b
3.4.11 A.9	The CTS Bases 4.1 was reorganized and reformatted to reflect the format and applicable content consistent with STS. This is an administrative change, editorial in nature, and does not affect the technical content or operational requirements.	B3.4.11	B4.1
3.4.11 A.10	The proposed change omits the CTS 4.1 (1) requirement that the PORVs be tested in accordance with ASME Boiler and Pressure Vessel Code, Section XI, Section IWV, Category B valves. In the ITS, Specification 5.5.7, "Inservice Testing Program," provides controls for inservice testing of ASME Code Class 1, 2, and 3 components. Since ITS 5.5.7 establishes equivalent testing requirements as those specified in CTS 4.1 (1), these requirements can be omited without a reduction in requirements.	N/A	4.1 (1)
3.4.12 Low Temperature Overpressure Protection (LTOP) System			
3.4.12 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.4.12	3.1.8 Fig. 3-4 3.3.5 4.1
3.4.12 A.2	The requirements of CTS 3.1.8.2 state that "...two PORV flow paths, each consisting of an Operable PORV, with a lift pressure less than specified in Figure 3-4, shall be Operable." In ITS 3.4.12, the phrase "PORV flow path" is not used and reference is made directly to the PORVs. This change is administrative because it only changes the presentation of the requirement and does not alter the original intent of the CTS. This change is consistent with STS.	3.4.12	3.1.8.2

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.4.12 A.3	The proposed change adds ITS LCO 3.4.12 b.2, which incorporates an optional method for providing overpressure protection of the PCS. This allows a vent path, capable of relieving 167 gpm at a pressure of 315 psia, to be used in lieu of PORVs to provide PCS overpressure protection. This change provides an alternate means for complying with the specification without reliance on the required actions. Specifying a PCS vent as a method of overpressure protection is consistent with STS.	LCO 3.4.12 b.2	3.1.8
3.4.12 A.4	The proposed change reformats the supplemental verifications required by the actions of CTS 3.1.8.2b.1 and 3.1.8.2b.2, forming a foundation for ITS SR 3.4.12.2. This change is administrative because it does not alter the original intent of the CTS and continues to ensure the vent path is in the required position at the same frequency specified in the CTS.	SR 3.4.12.2	3.1.8.2b.1 3.1.8.2b.2
3.4.12 A.5	The proposed change restates the CTS 4.1 (5) requirements to omit the statement "or when both shutdown cooling suction valves, MO-3015 and MO-3016, are open." This statement was inadvertently retained as a result of CTS Amendment 163. As part of the conversion to the ITS, this statement is omitted, because the revised requirements of CTS (3.3.5) are more restrictive and bound the requirement previously stipulated by CTS (3.3.2g). Thus, this change is acceptable because it corrects an administrative oversight which allowed the CTS to contain a surveillance requirement without a related specification.	N/A	4.1 (5)
3.4.12 A.6	The CTS Bases 4.1 was reorganized and reformatted to reflect the format and applicable content consistent with STS. This is an administrative change, editorial in nature, and does not affect the technical content or operational requirements.	B3.4.12	B4.1
3.4.12 A.7	The proposed change omits the CTS 4.1 (1) requirement that the PORVs be tested in accordance with ASME Boiler and Pressure Vessel Code, Section XI, Section IWV, Category B valves. In the ITS, Specification 5.5.7, "Inservice Testing Program," provides controls for inservice testing of ASME Code Class 1, 2, and 3 components. ITS 5.5.7 establishes equivalent testing requirements as those specified in CTS 4.1 (1). These requirements can be omitted without a reduction in requirements.	SR 3.4.12.4 Note	4.1 (4)a

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.4.13 PCS Operational LEAKAGE		
3.4.13 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.4.13	3.1.5 4.2 Table 4.2.2 Item 7 4.14.1
3.4.13 A.2	The proposed change adds the APPLICABILITY statement MODES 1,2,3 and 4 to the CTS 3.1.5 requirements, to form a foundation for ITS 3.4.13. The associated actions for CTS 3.1.5 eventually place the plant in cold shutdown when PCS leakage can not be restored to within their limit. The actions of CTS 3.1.5 establish the applicability for the LCO as MODES 1, 2, 3, and 4. Thus, the inclusion of an explicit applicability statement in ITS 3.4.13 is acceptable because it does not alter the requirement or intent of the CTS.	3.4.13 Applicability	3.1.5
3.4.13 A.3	The proposed change rewords and reformats the CTS 3.1.5d requirements regarding secondary leakage in a steam generator, to form a foundation for ITS LCO 3.4.13d. This change is acceptable because the requirement of the CTS and ITS are equivalent (i.e., 0.3 gpm x 60 min./hr. x 24 hrs./day = 432 gpd). The formatting and presentation of this change is conducive to establishing consistency with STS.	LCO 3.4.13d	3.1.5d
3.4.13 A.4	The proposed change omits a portion of the CTS 3.1.5d requirements regarding the transient value which limits the calculated leakage to 0.6 gpm for any period of greater than 24 hours during startups and major load changes when the leakage measurement sensitivity is reduced. This change is acceptable because the ITS still provides an allowance for measurement sensitivity during plant maneuvering via SR 3.4.13.1 and the associated notes.	N/A	3.1.5d
3.4.13 A.5	The CTS Bases 3.1.5 was reorganized and reformatted to reflect the format and applicable content consistent with STS. This is an administrative change, editorial in nature, and does not affect the technical content or operational requirements.	B3.4.13	B3.1.5

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.4.13 A.6	The proposed change restates the CTS 4.14.1 requirements and omits the reference to "Inservice Inspection and Testing Program, Specification 6.5.7," to form a foundation for ITS SR 3.4.13.2. This is because the Steam Generator Tube Surveillance Program provides the necessary controls to ensure the structural integrity of the SG tubes is maintained. Maintaining a program in the technical specification for SG tubing is consistent with 10 CFR 50.55a and therefore, fulfills the requirements for the ASME Boiler and Pressure Vessel Code. Omitting this reference is acceptable since the change does not alter the requirement or intent of the CTS. This change is consistent with STS.	N/A	4.14.1

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.4.14 PCS Pressure Isolation Valve (PIV) Leakage		
3.4.14 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.4.14	3.3.3 3.17 Table 3.17.6 Item 17 4.3 Table 4.3.1
3.4.14 A.3	The proposed change rewords and reformats the CTS 3.3.3 footnote, which states that "...motor operated valves shall be placed in the closed position and power supplies de-energized...," to form a foundation for ITS 3.4.14 Required Action A.1. The ITS action of establishing a closed manual valve or deactivated automatic valve is equivalent to the CTS footnote. Both the ITS and CTS ensure that an inadvertent opening of a power operated valve in the high pressure portion of a piping system which is used to isolate a PIV with excessive leaking, will not occur. Since the intent of the CTS has remained, this change is acceptable, and is consistent with STS.	3.4.14 Required Action A.1	3.3.3 footnote
3.4.14 A.4	The proposed change adds the Action Notes 1 and 2 to ITS 3.4.14 to include a method for tracking allowable out of service times for PIVs with excessive leakage, and to ensure an evaluation is performed on the affected system containing an inoperable PIV. The addition of these Notes in the ITS is acceptable because these changes do not involve a technical change to the CTS, but merely support the usage rules associated with the ITS.	3.4.14 Actions Notes 1 & 2	3.3.3
3.4.14 A.5	The proposed change restates the CTS 3.17.6.17a requirements by omitting the statement "The breaker may be racked in only during operation of associated valve." The allowance to rack in a breaker during the operation of the associated valve does not need to be stated because the plant condition in which the affected valves are required to be open to support plant operation is not inclusive in the Mode of Applicability. This change is acceptable since it does not alter the intent of the CTS.	N/A	3.17.6.17a

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.4.14 A.6	The proposed change adds ITS SR 3.4.14.1 Note 1, which states that testing is "Not required to be performed in MODES 3 and 4." The purpose of this Note is to avoid a potential LCO 3.0.4 conflict by allowing the SR to be performed after entering the Mode of Applicability of the required PIVs. This change is consistent with STS.	SR 3.4.14.1 Note 1	4.3
	3.4.15 PCS Leakage Detection Instrumentation		
3.4.15 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.4.15	Table 3.17.6 3.17 Table 4.17.6
3.4.15 A.2	CTS Table 3.17.6 item 7.d, and CTS Table 4.17.6 item 7.d list the "air cooler condensate flow switch" as a PCS leakage detection instrument. ITS 3.4.15 identifies this same leakage detection instrument as an "air cooler condensate level switch." This is an administrative change because it does not alter the original requirement of the CTS but simply corrects the reference to the type of device used to monitor for PCS leakage.	LCO 3.4.15c	Table 3.17.6 Item 7.d Table 4.17.6 Item 7.d
3.4.15 A.3	CTS 3.17.6.7.1 provides the actions necessary whenever a required channel of PCS leakage detection instrumentation is inoperable. ITS 3.4.15 Condition A requires the same actions, but requires the performance of a water inventory balance once per 24 hours. This change is administrative because CTS Table 4.2.2 Item 7 requires that primary system leakage be evaluated on a "daily" basis, and does not represent a change in plant operations.	3.4.15 Condition A	3.17.6.7.1
3.4.15 A.4	CTS Table 4.17.6 item 7 requires a Channel Functional Test and Channel Calibration every 18 months of the sump level, atmospheric gas monitor, and humidity monitor channels associated with the PCS leakage detection instrumentation. ITS 3.4.15 also contains testing requirements for these same channels but does not explicitly require the performance of a Channel Functional Test every 18 months. This is an administrative change because, by definition, a Channel Functional Test is encompassed by a Channel Calibration, which is performed every 18 months.	SR 3.4.15.5 SR 3.4.15.6 SR 3.4.15.7	Table 4.17.6 Item 7

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.4.16 PCS Specific Activity		
3.4.16 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.4.16	3.1.4 Table 4.2.1
3.4.16 A.2	CTS 3.1.4 addresses maximum PCS radioactivity, but does not provide explicit applicability. ITS 3.4.16 Applicability is MODES 1 and 2, and MODE 3 with PCS average temperature ≥ 500°F. This is an administrative change because it does not alter the requirement or intent of the CTS.	3.4.16 Applicability	3.1.4
3.4.16 A.3	CTS 3.1.4e requires sampling and analysis "until the specific activity of the primary coolant is restored to within its limits." ITS 3.4.16 does not contain this same statement. This is an administrative change because it provides consistency with the usage rules for technical specifications and does not involve a technical change to the requirements of the CTS. This change is consistent with STS.	N/A	3.1.4e
3.4.16 A.4	CTS 4.2 Table 4.2.1 specifies PCS sample tests when T_{ave} >500°F. ITS LCO 3.4.16 Applicability specifies PCS $T_{ave} \geq$ 500°F. This is an administrative change to establish consistency within the specification, and results in an insignificant change (<1°F).	LCO 3.4.16 Applicability	Table 4.2.1 Item 1

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.5 EMERGENCY CORE COOLING SYSTEM (ECCS) **3.5.1 Safety Injection Tanks (SITS)**		
3.5.1 A.1	This change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.5.1	3.3.1
3.5.1 A.2	CTS 3.3.1 states that "the reactor shall not be made critical ...unless the following condition are met." In ITS 3.5.1 this same statement would correspond to the "Applicability." The Applicability for the SITs in the ITS 3.5.1 is MODEs 1 and 2. The CTS definitions state that the reactor is critical for purposes of administrative control when the neutron flux wide range channel instrumentation indicates greater than 10^{-4} % of Rated Power. The ITS defines MODE 2 as a reactivity condition (k_{eff}) ≥ .99 with Rated Thermal Power ≤ 5 %. Although the ITS definition of MODE 2 is slightly more restrictive than the CTS definition of Reactor Critical, this change is administrative since the difference between "k_{eff} ≥ 0.99" and "10^{-4} % rated power" is negligible.	3.5.1 Applicability	3.3.1
3.5.1 A.3	The engineering units used in CTS 3.3.1b to state the minimum and maximum SIT levels have been changed from "inches" to "cubic feet" to establish consistency with STS. The CTS values of "174 inches" and "200 inches" correspond to the ITS SR 3.5.1.2 values of "1040 ft^3" and "1176 ft^3" respectively. Therefore this is an administrative change.	SR 3.5.1.2	3.3.1.b
3.5.1 A.4	CTS 3.3.1 does not contain explicit actions if two or more SITs are inoperable. Therefore, LCO 3.0.3 must be entered. For this same inoperability, ITS 3.5.1 Required Action D contains an explicit requirement to entry into immediately LCO 3.0.3. This change does not impose any new requirement on plant operation. Therefore this is an administrative change consistent with STS.	3.5.1 Condition D	3.3.1
3.5.1 A.5	CTS 3.3.2e provides the required actions for any valves, interlocks or piping directly associated with the SITs. CTS 3.3.2f provides the required actions for any valves, interlocks or piping associated with the SITs which is not covered by CTS 3.3.2e. In ITS 3.5.1, these same valves, interlocks and piping are addressed by the definition of Operability. Since the definition of Operable in the CTS is consistent with the definition of Operable in the ITS, the required actions of CTS 3.3.2e and CTS 3.3.2f are no longer necessary.	LCO 3.5.1	3.3.2 e & f

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.5.2 ECCS - OPERATING		
3.5.2 A.1	This change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.5.2	3.3.1
3.5.2 A.2	CTS 3.3.2e provides the required actions for any valves, interlocks or piping directly associated with the LPSI and HPSI pumps. CTS 3.3.2f provides the required actions for any valves, interlocks or piping associated with the safety injection and shutdown cooling system which is not covered by CTS 3.3.2e. In ITS 3.5.2, these same valves, interlocks and piping are addressed by the definition of Operability. Since the definition of Operable in the CTS is consistent with the definition of Operable in the ITS, the required actions of CTS 3.3.2e and CTS 3.3.2f are no longer necessary.	LCO 3.5.2	3.3.2 e &f
3.5.2 A.3	CTS 4.6.3b states the acceptance level of performance for the safety injection pumps and shutdown cooling pumps. ITS SR 3.5.2.4 states the performance level of these same pumps. CTS 4.6.3b states "that the pumps start, reach their rated heads on recirculation flow, and operate for at least 15 minutes." ITS SR 3.5.2.4 requires a verification that "each pump's developed head at the test flow point is greater than or equal to the required developed head." As such, the wording change presented in ITS SR 3.5.2.4 provides an equivalent level of testing as contained in CTS 4.6.3b. This change is consistent with STS.	SR 3.5.2.4	4.6.3b
3.5.2 A.4	CTS 4.6.3a establishes a testing frequency for the safety injection pumps and shutdown cooling pumps at an interval not to exceed three months. ITS SR 3.5.2.4 specifies a testing frequency for the same pumps as "In accordance with the Inservice Testing Program." The Inservice Testing (IST) Program, addressed in ITS Chapter 5.0, "Administrative Control," provides controls for inservice testing of ASME Code Class 1, 2, and 3 components. Testing frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda are utilized in the IST program. For Code Class 1, 2, and 3 pumps, the testing frequency is specified as "Quarterly or every 3 months." The frequency specified in the ITS is equivalent to a frequency of "3 months" as stated in CTS 4.6.3a. This change is consistent with STS.	SR 3.5.2.4	4.6.3a

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.5.2 A.5	CTS 4.6.1a specifies the requirement to perform a system test of the safety injection system by initiating a test safety injection signal and verifying proper component actuation. ITS SR 3.5.2.5 and ITS SR 3.5.2.6 stipulate the same testing requirements as the CTS but specify an alternate means for initiating the test signal. The change allows the use of an "actual or simulated actuation" signal to meet the surveillance requirement. Because an actual initiation is as good or better for testing of the function than a simulated initiation, the requirement does not change the technical content or validity of the test. Therefore, this is an administrative change and is consistent with STS.	SR 3.5.2.5 SR 3.5.2.6	4.6.1a
3.5.2 A.6	The requirement of CTS 4.6.1a to perform a system test of the safety injection system has been revised in ITS SR 3.5.2.5 to exclude valves that are locked, sealed, or otherwise secured in position. For valves that have been secured in their accident position, assurance is provided that an Operable ECCS flow path exist without reliance on an automatic actuation signal. Since automatic valves that are locked, sealed, or otherwise secured in position are treated as manual valves and are under administrative control, the exclusion of an actuation test is an administrative change. This change is consistent with STS.	SR 3.5.2.5	4.6.1a
	3.5.4 REFUELING WATER STORAGE TANK		
3.5.4 A.1	This change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.5.4	3.3.1
3.5.4 A.2	CTS 3.3.1a specifies the required parameters for the SIRW Tank but does not provide explicit actions if one or more parameters are not within limit. Therefore, whenever an SIRW Tank parameter is outside its limit, the plant applies the actions of CTS LCO 3.0.3. ITS 3.5.4 Condition B addresses the condition when the SIRW Tank is inoperable for reasons other than boron concentration or temperature being out of limit. The Completion Time associated with ITS 3.5.4 Condition B is 1 hour. The Completion Times associated with ITS 3.5.4 Conditions B and Condition C are the same times specified in ITS LCO 3.0.3 for placing the plant in a mode in which the SIRW Tank is not required. Since the Completion Times of ITS 3.5.4 Conditions B and C are equivalent to the times specified in ITS LCO 3.0.3, and the CTS 3.3.1a requires entry into CTS LCO 3.0.3 if an SIRW Tank parameter is out of limit, then the Required Actions of ITS 3.5.4 Conditions B and C represent the same actions as those specified in the CTS 3.3.1a. As such, this is an administrative change and is consistent with STS.	3.5.4 Conditions B and C	3.3.1a

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.5.5 TRISODIUM PHOSPHATE		
3.5.5 A.1	This change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.5.5	3.19
3.5.5 A.2	In CTS 3.19, the Applicability is stated as "when the PCS is ≥ 300°F." ITS LCO 3.5.5 states the Applicability for TSP as "MODES 1, 2, and 3." Since MODE 3 is define as an average reactor (primary) coolant temperature ≥ 300°F, the Applicability of the CTS 3.19 and the ITS 3.5.5 are equivalent. This change is consistent with STS.	3.5.5 Applicability	3.19
3.5.5 A.3	CTS 3.19.2b states that if the required actions are not met and the associated completion time has expired, "the reactor shall be placed in a condition where the affected equipment is not required." ITS 3.5.5 Condition B.2 requires the plant to be placed in MODE 4 if the "Required Actions and associated completion Times" (of Condition A) "are not met." Applicability of CTS 3.19 is when the PCS is ≥ 300 °F, or an ITS equivalent of MODES 1, 2, and 3. Thus, if the required allowed outage time is not met, the PCS must be reduced to < 300°F, or an ITS equivalent of MODE 4. As such, the Required Action in ITS 3.5.5 Condition B.2 is the same action required by CTS 3.19.2b. This change is consistent with STS.	3.55 Required Action B	3.19.2b

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.6 CONTAINMENT SYSTEMS **3.6.1 Containment**		
3.6.1 A.1 OPEN	This change reformats, renumbers and rewords the CTS with no change of intent.	3.6.1	1.0 3.6.1 4.5.2
3.6.1 A.3	CTS 3.6.1 specifies that "CONTAINMENT INTEGRITY shall be maintained." ITS 3.6.1 specifies that the "Containment shall be OPERABLE." The CTS defines "CONTAINMENT INTEGRITY" in Chapter 1.0, parts (a) through (e). The ITS separates the contents of the definition for "Containment Integrity" into ITS LCO 3.6.1, LCO 3.6.2, and LCO 3.6.3. Thus, this is an Administrative change.	3.6.1	3.6.1
3.6.1 A.4 OPEN	Being evaluated.	N/A	N/A
3.6.1 A.5 OPEN	Being evaluated.	N/A	N/A
3.6.1 A.6	CTS 4.5.4, "Surveillances for Prestressing System," CTS 4.5.5, "End Anchorage Concrete Surveillance," and CTS 4.5.6, "Dome Delamination Surveillance," specify surveillance tests which are required to be performed. These Surveillances are contained in the Containment Structural Integrity Surveillance Program in TS Chapter 5.0, Administrative Controls. ITS SR 3.6.1.2 provides a reference to this program. This is an administrative change,	5.0 SR 3.6.1.2	4.5.4 4.5.5 4.5.6
3.6.1 A.7	CTS 4.5.2.c(2) states "... the plant shall be placed in at least HOT SHUTDOWN within the next 6 hours and in COLD SHUTDOWN within the following 30 hours." ITS 3.6.1 replaces the CTS term Hot Shutdown with MODE 3, and Cold Shutdown with MODE 5. This change is acceptable since the effective difference on plant operations is unchanged.	3.6.1 Required Action B	4.5.2.c(2)
3.6.1 A.8 OPEN	The CTS does not contain an explicit exemption from the testing frequency of 10 CFR 50, Appendix J. The Frequency of ITS SR 3.6.1.3 is modified by a Note which states that "SR 3.0.2 is not applicable." The inclusion of this Note is for clarification purposes only.	SR 3.6.1.3	N/A

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.6.1 A.9	CTS 3.6.1a requires that Containment Integrity be maintained "when the plant is above Cold Shutdown. In the ITS, this statement is equivalent to an Applicability of MODES 1, 2, 3, and 4. Since the CTS definition of Cold Shutdown is essentially the same as the ITS definition of MODE 5, there is no change to the actual requirement. This is an administrative change.	3.6.1 Applicability	3.6.1a
	3.6.2 Containment Air Locks		
3.6.2 A.1 OPEN	This change reformats, renumbers and rewords the CTS with no change of intent.	3.6.2	1.0 3.6.1 4.5.2
3.6.2 A.3	CTS 3.6.1.2 specifies that "CONTAINMENT INTEGRITY shall be maintained" with CONTAINMENT INTEGRITY being defined in Chapter 1.0, Definitions. The ITS takes the elements of "CONTAINMENT INTEGRITY" and restructures them into LCO 3.6.1, LCO 3.6.2, and LCO 3.6.3.	3.6.1 3.6.2 3.6.3	1.0 3.6.1.2
3.6.2 A.5	ACTION Note 3 is added in the ITS and states "Enter applicable Conditions and Required Actions of LCO 3.6.1 "Containment," when air lock leakage results in exceeding the overall containment leakage rate." This note provides guidance in accordance with LCO 3.0.6 to specify when other TS should be followed. This addition of this note is an administrative change since it provides guidance on the use and application of the ITS and maintains the intent of CTS 4.5.2.c.(2) and 4.5.2.d.(1).(b).	Action Note 3	3.6.1 4.5.2.c.(2) 4.5.2.d.(1).(b)
3.6.2 A.6	CTS Section 1.0 defines "CONTAINMENT INTEGRITY" and states "at least one door in each air lock is properly closed and sealed." In ITS 3.6.2, this statement forms the basis for Required Actions A.1, B.1, and C.2 since it requires the air lock doors be OPERABLE. The CTS phrase "and sealed" is not included in the ITS as it is implicit in the use of an "OPERABLE" door.	3.6.2 Required Actions A.1, B.1, C.1	1.0
3.6.2 A.7	CTS 4.5.2.c(3) and (4) state "... the plant shall be placed in at least HOT SHUTDOWN within the next 6 hours and in COLD SHUTDOWN within the following 30 hours." ITS 3.6.2 replaces the CTS term Hot Shutdown with MODE 3, and Cold Shutdown with MODE 5. This change is acceptable since the effective difference on plant operations is unchanged.	3.6.2 Required Action D	4.5.2c(3) 4.5.2c(4)
3.6.2 A.9 OPEN	ITS 3.6.2 Required Action B Note 1 specifies that Required Actions B.1, B.2, and B.3 are not applicable if both doors in the same air lock are inoperable and Condition C is entered. This is an administrative change since this information is implicit in the CTS and is only stated to clarify the usage rules of the ITS.	3.6.2 Required Action B Note 1	4.5.2

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.6.2 A.10 OPEN	ITS SR 3.6.2.1 contains a Note which states "An inoperable air lock door does not invalidate the previous successful performance of the overall air lock leakage tests." This Note provides clarification on the usage rules of TS for this particular application because it is recognized that one closed OPERABLE door will provide containment integrity and should not invalidate the overall air lock leakage test. This is an administrative change since this information is implicit in the CTS and is only stated to clarify the application of the ITS usage rules.	SR 3.6.2.1 Note 1	4.5.2
3.6.2 A.11	ITS 3.6.2 Required Action A contains a Note which states "Required Actions A.1, A.2, and A.3 are not applicable if both doors in the same air lock are inoperable and Condition C is entered." This note is provided to clarify the ITS usage rules. This change does not impose any additional requirements beyond those in the CTS. Thus, this is an administrative change.	3.6.2 Required Action A Note 1	4.5.2
3.6.2 A.12	CTS 4.5.2c(2) starts out by stating "If at any time it is determined that total containment leakage exceeds L_a...." This implies that the air lock leakage, as well as any other containment leakage, is always compared against the overall containment leakage requirements. ITS SR 3.6.2.1 contains a Note which states "Results shall be evaluated against acceptance criteria of SR 3.6.1.3 in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions. The addition of this note is an administrative change to provide a reminder to compare the test results against the overall containment leakage limit.	SR 3.6.2.1 Note 2	4.5.2c(2)
3.6.2 A.14 OPEN	The Frequency of ITS SR 3.6.2.1 is modified by a Note which states that "SR 3.0.2 is not applicable." The inclusion of this Note is for clarification purposes only. This is an administrative change since the CTS does not contain an explicit exemption from the testing frequency of 10 CFR 50, Appendix J.	SR 3.6.2.1 Note	4.5.2
3.6.2 A.15	CTS 3.6.1a requires that Containment Integrity be maintained "when the plant is above Cold Shutdown. In the ITS, this statement is equivalent to an Applicability of MODES 1, 2, 3, and 4. Since the CTS definition of Cold Shutdown is essentially the same as the ITS definition of MODE 5, replacing the CTS phrase "when the plant is above Cold Shutdown" with an Applicability of "MODE 1, 2, 3, and 4" does not alter the actual requirement. This is an administrative change.	3.6.2 Applicability	3.6.1a

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.6.3 Containment Isolation Valves		
3.6.3 A.1 OPEN	This change reformats, renumbers and rewords the CTS with no change of intent.	3.6.3	1.0 3.6.1 3.6.5 4.2 Tbl 4.2.2 4.5.2 4.5.3
3.6.3 A.2	ITS Condition A contains a note which states "Only applicable to penetration flow paths with two containment isolation valves." This note is added to clarify which condition is to be entered based on the containment penetration configuration with respect to isolation valves. This is an administrative change to assist in TS usage.	3.6.3 Condition A	3.6.1
3.6.3 A.3	CTS 3.6.1 specifies that "CONTAINMENT INTEGRITY shall be maintained" with CONTAINMENT INTEGRITY being defined in Chapter 1.0, Definitions. The ITS takes the elements of "CONTAINMENT INTEGRITY" and restructures them into LCO 3.6.1, LCO 3.6.2, and LCO 3.6.3. This is an administrative change.	3.6.1 3.6.2 3.6.3	3.6.1
3.6.3 A.4	CTS 3.6.1 Action c states "... the plant shall be placed in at least HOT SHUTDOWN within the next 6 hours and in COLD SHUTDOWN within the following 30 hours." ITS 3.6.3 replaces the CTS term Hot Shutdown with MODE 3, and Cold Shutdown with MODE 5. This change is acceptable since the effective difference on plant operations is unchanged.	3.6.3 Required Action E	3.6.1 Action c
3.6.3 A.5	ITS Condition A contains the phrase "(except for purge exhaust valve or air room supply valve not locked closed)". This statement tells the user that another Condition applies for this situation. Although this information is not explicitly stated in the CTS, this is an administrative change since it clarifies the proper usage and application of the ITS and maintains the intent of the CTS.	3.6.3 Condition A Note	3.6.1
3.6.3 A.6	CTS 3.6.1 Action b provides means to isolate a flow path by use of at least one closed and deactivated automatic valve. ITS 3.6.3 include the provision for a check valve with the flow secured to be used as a mechanism to ensure that the flow path is isolated since it represents a viable method of isolation. This is an administrative change since it simply equates the isolation capability of a check valve to the isolation capability of a deactivated automatic valve.	LCO 3.6.3	3.6.1 Action b

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.6.3 A.7	CTS 3.0.3 requires the plant to be placed in Cold Shutdown within 37 hours when two containment isolation valves in the same flow path penetration are in operable. For this same inoperability, ITS 3.6.3 Condition B and Condition E require the plant to be placed in Cold Shutdown within 37 hours. This is an administrative change since the CTS and ITS actions result in equivalent Completion Times.	3.6.3 Required Actions B and E	3.0.3
3.6.3 A.8 OPEN	CTS 3.6.1 is modified by a footnote that allows penetration flow paths to be unisolated intermittently under administrative control. CTS 3.6.5 precludes the opening of the purge exhaust valves and air room supply valves In ITS 3.6.3, the footnote from CTS 3.6.1 and the restriction on valve operation from CTS 3.6.5 becomes Actions Note 1. This is an administrative change since it does not change any requirements but rather specifies what can be opened intermittently.	3.6.3 Action Table Note 1	3.6.1 3.6.5
3.6.3 A.9	CTS 4.5.2c(2) requires that corrective actions be initiated "if at any time it is determined that the total containment leakage rate exceeds La". CTS 4.5.2d(1) requires individual penetrations and containment isolation valves to be leak tested. ITS 3.6.3 Note 4 states "Enter applicable Conditions and Required Actions of LCO 3.6.1 "Containment," when leakage results in exceeding the overall containment leakage rate acceptance criteria." Note 4 does not imply any additional requirements, but simply provides a cross-reference between two specifications. Thus, the addition of Note 4 is an administrative change.	3.6.3 Action Table Note 4	4.5.2c(2) 4.5.2d(1)
3.6.3 A.10	ITS 3.6.3 contains ACTION Notes 2 and 3 which are not explicitly stated in the CTS. These notes involve the application of ITS usage rules. Note 2 states "Separate Condition entry is allowed for each penetration flow path." Note 2 is consistent with the approach used in CTS 3.6.1 to address inoperable CIVs in multiple penetrations. Note 3 states "Enter applicable Conditions and Required Actions for systems made inoperable by containment isolation valves." This philosophy is consistent with the CTS as specified in LCO 3.0.1. Note 3 does not impose any additional requirement to, or relaxation from, the CTS but simply clarifies that support system Conditions and Required Actions must be entered and that reliance exclusively on the support system Required Actions is not permissible. These are administrative changes.	3.6.3 Action Notes 2 & 3	3.6.1
3.6.3 A.11	CTS 3.6.1 ACTION a states "Restore the inoperable valve to OPERABLE status within 4 hours." This statement is not included in the proposed ITS because it is not necessary. The option to restore a component to OPERABLE status is already provided by LCO 3.0.2 and is redundant to specify it in the ACTIONS. This is an administrative change.	LCO 3.0.2	3.6.1 Action a

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.6.3 A.12	CTS 4.5.3b references "...each containment isolation right channel or left channel test signal" when discussing testing requirements for containment isolation valves. ITS SR 3.6.3.6 replaces this phrase with "an actual or simulated actuation signal." The ITS allows an actual or simulated signal since either signal could function as a "test" and would have no effect on the results of the test. This is an administrative change.	SR 3.6.3.6	4.5.3b
3.6.3 A.13	CTS 4.5.3e specifies "Each three months the isolation valves must be stroked to the position required to fulfill their safety function unless it is established that such operation is not practical during plant operation. The latter valves shall be full-stroked during each COLD SHUTDOWN." This statement is duplicative of the regulations contained in 10 CFR 50.55a, which incorporates by reference the requirements and frequencies of ASME Section XI, and is not needed to be included in the TS. This is an administrative change since the requirements of 10 CFR 50.55a, and by reference, the requirements of ASME Section XI, must be met .	N/A	4.5.3e
3.6.3 A.14	CTS Table 4.2-2 Item 13 specifies the Containment Purge and Ventilation Isolation Valves shall be determined closed. CTS 3.6.5 requires the containment purge exhaust and air room supply isolation valves shall be locked closed. In the ITS, these requirement are combined to form SR 3.6.3.1. This is an administrative change.	SR 3.6.3.1	4.2 Table 4.2.2 #13 3.6.5
3.6.3 A.16	CTS 3.6.1a requires that Containment Integrity be maintained "when the plant is above Cold Shutdown. In ITS 3.6.3, this statement is equivalent to an Applicability of MODES 1, 2, 3, and 4 Since the CTS definition of Cold Shutdown is essentially the same as the ITS definition of MODE 5, replacing the CTS phrase "when the plant is above Cold Shutdown" with an Applicability of "MODE 1, 2, 3, and 4" does not alter the actual requirement. This is an administrative change.	3.6.3 Applicability	3.6.1a
3.6.3 A.17	The Actions of CTS 3.6.1 state, in part, "with one or more containment isolation valves inoperable (including during performance of valve testing) maintain at least one..." In ITS 3.6.3, it is not necessary to include the parenthetical phrase "including during performance of valve testing" since LCO 3.0.2 stipulates that the Required Actions associated with a Condition be taken whenever the LCO is not met. This is an administrative change.	LCO 3.0.2	3.6.1 Actions

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.6.3 A.18	CTS 3.6.5 provides the corrective actions when one containment purge exhaust or air room supply isolation valve is not locked closed. LCO 3.0.3 provides the corrective actions when more than one containment purge exhaust or air room supply isolation valve is not locked closed. ITS 3.6.3 Condition D and Condition E provide equivalent actions and Completion Times for multiple inoperable purge exhaust or air room supply isolation valve as the CTS. This is an administrative change.	3.6.3 Required Actions D and E	3.6.5 3.0.3
	3.6.4 Containment Pressure		
3.6.4 A.1	This change reformats, renumbers and rewords the CTS with no change of intent.	3.6.4	3.6.2
3.6.4 A.2	CTS 3.6.2a specifies a limit of 1.5 psig for containment pressure "when above Cold Shutdown and below Hot Standby." ITS 3.6.4 changes this to "in MODES 3 and 4." The region above Cold Shutdown and below Hot Standby is considered to be the equivalent to the ITS MODES 3 and 4. This is an administrative change.	3.6.4 Applicability	3.6.2a
3.6.4 A.3	CTS 3.6.2b specifies a limit of 1.0 psig for containment pressure when in "Power Operation or Hot Standby." ITS 3.6.4 changes this to "MODES 1 and 2." There is minimal difference between the CTS conditions of Hot Standby and Power Operation and the ITS MODES 1 and 2 because the combination of MODES 1 and 2 define conditions similar to the combined CTS limits. This is an administrative change and is consistent with the STS.	3.6.4 Applicability	3.6.2a
3.6.4 A.4	CTS 3.6.2 requires that if containment pressure is not restored to within limit, the plant be placed in Hot Shutdown within the next 6 hours and in Cold Shutdown within the following 30 hours. In ITS 3.6.4, the CTS term Hot Shutdown is replaced by MODE 3 and Cold Shutdown is replaced by MODE 5 since the effect on operations is similar. This is an administrative change.	3.6.4 Required Action B	3.6.2
	3.6.5 Containment Temperature		
3.6.5 A.1	This change reformats, renumbers and rewords the CTS with no change of intent.	3.6.5	3.6.3
3.6.5 A.2	CTS 3.6.3 requires that containment average air temperature cannot exceed 140°F when the plant is above COLD SHUTDOWN. ITS 3.6.5 replaces the CTS term Cold Shutdown with MODE 5. This is acceptable since the operational impact of the terminology difference is minimal. This is an administrative change.	3.6.5 Applicability	3.6.3

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.6.5 A.3	CTS 3.6.3 requires that if containment temperature is not restored to within limit, the plant be placed in Hot Shutdown within the next 6 hours and in Cold Shutdown within the following 30 hours. In ITS 3.6.5, the CTS term Hot Shutdown is replaced by MODE 3 and Cold Shutdown is replaced by MODE 5 since the effet on operations is similar. This is an administrative change.	3.6.5 Required Action B	3.6.3
	3.6.6 Containment Cooling Systems		
3.6.6 A.1 (BYS)	This change reformats, renumbers and rewords the CTS with no change of intent . This change is encompassed by a Beyond Scope issue which is discussed in Section G of this Safety Evaluation.	3.6.6	3.4
3.6.6 A.2	CTS 3.4.3 states "Continued power operation with one component out of service shall be as specified in Section 3.4.2, with the permissible period of inoperability starting at the time that the first of the two components became inoperable." In the ITS explanatory information on usage rules is addressed in Section 1.3, Completion Times. This is an administrative change.	1.3	3.4.3
3.6.6 A.3	CTS 3.4.1 specifies that the reactor shall not be made critical "except for low-temperature physics tests." ITS 3.1.7 specifies the requirements for Special Test Exceptions but does not include low temperature physics testing since these tests were performed as part of initial criticality activities and are no longer required. This change is acceptable since it removes reference to testing that is no longer required. This is an administrative change.	3.1.7	3.4.1
3.6.6 A.4	CTS 3.4.4 and CTS 3.4.5 stipulates that valves, interlocks and piping that are directly associated with a specified components meet the same requirements as listed for that component. In the ITS, these requirements are addressed by the definition of OPERABILITY which requires that all associated equipment be OPERABLE. This change is acceptable since the requirement remains that all equipment in a train be OPERABLE. This is an administrative change.	LCO 3.6.6	3.4.4 3.4.5
3.6.6 A.5	CTS 4.6.3 specifies that the containment spray pumps be tested at intervals "not to exceed three months." In the proposed ITS SR 3.6.6.5 this is changed to be "In accordance with the Inservice Test Program." This change is acceptable since the three month frequency is contained in the Inservice Test Program. This is an administrative change.	SR 3.6.6.5	4.6.3
3.6.6 A.6	CTS 4.6.2a specifies in part that for the Containment Spray System Test: "Operation of the system is initiated by tripping the normal actuation instrumentation." ITS SR 3.6.6.7 add the phrase "by an actual or simulated actuation signal." The allowance to use an actual or simulated actuation signal does not alter the intent of the testing requirement. This is an administrative change.	SR 3.6.6.7	4.6.2a

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.6.6 A.7	CTS 4.6.2.a requires a system test of the containment spray system that is initiated by tripping the normal actuation instrumentation. ITS SR 3.6.6.7 requires verification of automatic containment spray pump start upon receipt of an actuation signal. Since the containment spray pumps are an integral part of the containment spray system, this change does not result in the addition or removal of any requirement. This is an administrative change.	SR 3.6.6.7	4.6.2
	3.6.7 Hydrogen Recombiners		
3.6.7 A.1	This change reformats, renumbers and rewords the CTS with no change of intent .	3.6.7	3.6.4 4.2 Table 4.2.2
3.6.7 A.2	CTS 3.6.4 requires that two hydrogen recombiners be OPERABLE when the plant is in "Power Operation or Hot Standby." ITS 3.6.7 has an Applicability of MODES 1 and 2. The CTS reactor operating conditions of Power Operation and Hot Standby are nominally the operationally equivalent to ITS MODES 1 and 2. This is an administrative change.	3.6.7 Applicability	3.6.4
3.6.7 A.3	CTS Table 4.2.2 Item 11.b.1 requires that a channel calibration of all recombiner instrumentation and control circuits be performed at least once per refueling cycle. ITS SR 3.6.7.1 requires a functional test of each recombiner every 18 months. Since all of the recombiner functions will be tested and verified to be working properly as part of the system functional test, the requirements of the CTS and ITS are essentially equivalent. This is an administrative change.	SR 3.6.7.1	4.2 Table 4.2.2 #11.b.1

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.7 PLANT SYSTEMS **3.7.1 Main Steam Safety Valves (MSSVs)**		
3.7.1 A.1	This change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.7.1	3.1.7 4.2
3.7.1 A.2	CTS 3.1.7.2a requires that with less than 23 MSSVs OPERABLE the plant must be placed in HOT SHUTDOWN. In the ITS 3.7.1.2 Required Action B.1, the CTS term is replaced with MODE 3. The difference between the CTS definition of HOT SHUTDOWN and the ITS definition of MODE 3 represents a small change which is considered administrative.	3.7.1	3.1.7.2a
3.7.1 A.3	CTS 3.1.7.2 contains a footnote requiring the valve setting be within 1% after testing or maintenance that could affect the set point. ITS SR 3.7.1.1, does not specify "or maintenance" because it is a subset of testing. This is an administrative change.	SR 3.7.1.1	3.1.7.2
3.7.1 A.4	CTS 4.2 Table 4.2.2 item 4 requires 5 MSSVs to be tested each refueling. The refueling cycle is 18 months for the Palisades plant. SR 3.7.1.1 states, "In accordance with the Inservice Testing Program," in which 20% of the MSSVs (4.6 valves) are tested in 24 months and all valves will be tested in a 5 year period. The difference between CTS 4.2 Table 4.2.2 item 4 and ITS SR 3.7.1.1 is 0.4 valves in a 6 month period. The requirement for all valves are to be tested in a 5 year period remains the same. This is an administrative change.	SR 3.7.1.1	Table 4.2.2 Item 4
	3.7.2 Main Steam Isolation Valves (MSIVs)		
3.7.2 A.1	This change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.7.2	3.5.1 3.5.2 4.8
3.7.2 A.2	The Bases of the CTS for this section have been completely replaced by revised Bases that reflect the format and applicable content consistent with STS.	Bases 3.7.2	Bases 3.5 4.8
3.7.2 A.3	CTS 4.8 surveillance requires that the MSIVs be tested every refueling shutdown. ITS SR 3.7.2.1 frequency is every 18 months. Palisades refueling cycle is approximately 18 months which is basically the same time frame. This is an administrative change.	3.7.2	4.8

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.7.2 A.4	CTS 3.5.3 requires that with a MSIV inoperable, the plant must be placed in Hot Standby. ITS 3.7.2 Action B.1, requires that with one MSIV inoperable the plant be placed in MODE 2. The difference between the CTS definition of HOT STANDBY and the ITS definition of MODE 2 represents a small change which is considered administrative.	3.7.2	3.5.3
3.7.2 A.5	CTS 3.5.3 requires that with a MSIV inoperable, the plant must be placed in HOT SHUTDOWN. ITS 3.7.2 Action D.1, requires that with a MSIV inoperable the plant must be placed in MODE 3. The difference between the CTS definition of HOT SHUTDOWN and the ITS definition of MODE 3 represents a small change which is considered administrative.	3.7.2	3.5.3
3.7.3 Main Feedwater Regulating Valves (MFRVs) and MFRV Bypass Valves			
3.7.3 A.1	This change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.7.3	4.2
3.7.3 A.2	The Bases of the CTS for this section have been completely replaced by revised Bases that reflect the format and applicable content consistent with STS.	3.7.3	4.2
3.7.4 Atmospheric Dump Valves (ADVs)			
3.7.4 A.1	This change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.7.4	N/A
3.7.5 Auxiliary Feedwater (AFW) System			
3.7.5 A.1	This change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.7.5	3.5
3.7.5 A.2	The Bases of the CTS for this section have been completely replaced by revised Bases that reflect the format and applicable content consistent with STS	3.7.5 Bases	4.9 Basis
3.7.5 A.3	CTS 3.5.1b informs the operator that the AFW instrumentation must meet the minimum operability requirements of Specification 3.17. ITS 3.7.5 does not refer to another section for requirements because the ITS format does not usually refer to other sections for requirements. This is an administrative change.	3.7.5	3.5.1b

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.7.5 A.4	CTS 3.5.1a states that the steam driven AFW pump will be OPERABLE prior to taking the reactor critical. ITS LCO 3.7.5 Note requires the turbine driven AFW pump to be OPERABLE in MODES 1 and 2. The difference between the applicability for this CTS requirement and the ITS definitions of MODES 1 AND 2 represents a small change which is considered administrative.	3.7.5	3.5.1a
3.7.5 A.5	CTS 3.5.3 requires the plant to be placed in Hot Shutdown if specific components of the AFW system are not operable. ITS 3.7.5 Required Action C.1, requires the plant to be put in MODE 3 if similar AFW system components are not operable. The difference between the CTS definition of HOT SHUTDOWN and the ITS definition of MODE 3 represents a small change which is considered administrative.	3.7.5	3.5.3
3.7.5 A.6	CTS 4.9.b.1 requires verification that each automatic AFW valve, not normally locked in position, actuates to its correct position (or that the specified flow is established) upon receipt of a simulated auxiliary feedwater pump start signal. ITS SR 3.7.5.3 requires the same verification and contains a Note which states that the verification is not required in MODES 2 or 3 when AFW is in operation. This change is acceptable since Palisades uses the AFW system for steam generator level control during startup and shutdown in Hot Standby and Hot shutdown which are the equivalent of ITS MODES 2 & 3. This is an administrative change because during startup or shutdown, the valves are throttled to provide specific flow in the equivalent of MODES 2 & 3 to prevent overfilling of the steam generators.	3.7.5	4.9.b.1
3.7.5 A.7	CTS 4.9.a.1 and a.2 require verification of the operability of the AFW pumps without referring to the Inservice Testing Program. ITS SR 3.7.5.2 requires verification of the operability of the AFW pumps in accordance with the Inservice Testing Program. This is an administrative change that combines two requirements, that are currently performed in accordance with CTS surveillances and the ASME Code.	SR 3.7.5.2	4.9.a.1
3.7.5 A.8	CTS 3.5.4 provides corrective actions when all AFW pumps are inoperable. ITS 3.7.5 Condition D provides corrective actions when two AFW trains are inoperable. The AFW system inoperability addressed in ITS 3.7.5 Condition D (a loss of AFW function) is equivalent to the condition presented in CTS 3.5.4. This is an administrative change.	3.7.5 Condition D	3.5.4
3.7.5 A.9	CTS 4.9.b.1 and 2 specify, in part, that for the Auxiliary Feedwater System valve and pump tests, operation of the system is initiated by a simulated actuation signal. ITS SR 3.7.5.3 and SR 3.7.5.4 allow actuation by an actual or simulated signal. This is acceptable because the channel being tested cannot differentiate between an actual or simulated signal and either initiation can demonstrate system Operability. This is an administrative change.	SR 3.7.5.3 SR 3.7.5.4	4.9.b.1 4.9.b.2

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.7.6 Condensate Storage and Supply		
3.7.6 A.1	This change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.7.6	3.5
3.7.6 A.2	CTS 3.5.3 requires that if component(s) listed in Specification 3.5.1 and 3.5.2 are inoperable for more than the time specified, the plant must be placed in Hot Shutdown. ITS 3.7.6 Required Action B.1, if Required Actions are not met, requires the plant be placed in MODE 3. The difference between the CTS definition of HOT SHUTDOWN and the ITS definition of MODE 3 represents a small change which is considered administrative.	3.7.6	3.5.3
	3.7.7 Component Cooling Water (CCW) System		
3.7.7 A.1	This change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS	3.7.7	3.3 3.4
3.7.7 A.2	CTS 3.4.2 and 3.4.3 require, if a component(s) listed in Specification 3.4.1 is inoperable for more than the time specified, the plant must be placed in Hot Shutdown. ITS 3.7.7 Required Action B.1 requires, if Required Action A.1 is not met, the plant to be placed in MODE 3. The difference between the CTS definition of HOT SHUTDOWN and the ITS definition of MODE 3 represents a small change which is considered administrative.	3.7.7	3.4.2 3.4.3
3.7.7 A.3	CTS 3.4.4 specifies that valves, interlocks and piping that are directly associated with CTS 3.4.1 components shall meet the same requirements as listed for that component. CTS 3.4.5 specifies that valves, interlocks and piping which is associated with the containment cooling system and not covered by CTS 3.4.4 may be inoperable for no more than 24 hours if it is required to function during an accident. ITS 3.7.7 requires all equipment in a particular train which is required to function during an accident to be OPERABLE and all equipment in the train to have the same Completion Time. This is acceptable because the requirement remains that all equipment in a train of containment cooling must be OPERABLE. This is an administrative change.	3.7.7	3.4.4 3.4.5

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.7.7 A.4	CTS 3.3.2, 3.4.2, and 3.4.3 require that when the Required Action and associated Completion Time are not met, the plant will be placed in Cold Shutdown. ITS 3.7.7, Required Action B.2, requires that when the Required Action and associated Completion Time are not met, the plant will be placed in MODE 5. The difference between the CTS definition of COLD SHUTDOWN and the ITS definition of MODE 5 represents a small change which is considered administrative.	3.7.7	3.3.2 3.4.2 3.4.3
3.7.7 A.5	CTS 3.4.3 states "....Continued power operation with one component out of service shall be as specified in Section 3.4.2, with the permissible period of inoperability starting at the time that the first of the two components became inoperable. This explanatory information on the usage rules of technical specifications is addressed in the ITS Section 1.3, "Completion Times," and is not addressed in the Actions of ITS 3.7.7. This is an administrative change.	3.7.7	3.4.2 3.4.3
3.7.7 A.6	ITS SR 3.7.7.1 contains a Note to remind the operator that loss of CCW flow to a component may render that component inoperable but does not affect the OPERABILITY of the CCW System. The CTS do not contain a similar note. This change is an administrative change.	3.7.7	N/A
	3.7.8 Service Water System (SWS)		
3.7.8 A.1	This change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.7.8	3.4 4.2 4.6
3.7.8 A.2	CTS 3.4.2 and 3.4.3 require that if a component listed in Specification 3.4.1 is inoperable for more than the time specified, the plant must be placed in HOT SHUTDOWN. ITS 3.7.8 Required Action B.1, requires that if Required Action A.1 and the associated Completion Time are not met, the plant must be placed in MODE 3. The difference between the CTS definition of HOT SHUTDOWN and the ITS definition of MODE 3 represents a small change which is considered administrative.	3.7.8	3.4.2 3.4.3

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.7.8 A.3	CTS 3.4.4 specifies that valves, interlocks and piping that are directly associated with the CTS 3.4.1 components shall meet the same requirements as listed for that component. This requirement is addressed by the definition of OPERABILITY which states that all equipment necessary (attendant, auxiliary) for the train to perform its specified safety function are also capable of performing their related support functions. ITS 3.7.8 requires all equipment in a particular train which is required to function during an accident must be OPERABLE and all equipment in the train will have the same Completion Time. This change is acceptable because the requirement remains that all necessary equipment in a train of containment cooling must be OPERABLE. This is an administrative change.	3.7.8	3.4.4 3.4.1
3.7.8 A.4	CTS 3.4.2 and 3.4.3 require that if a component listed in Specification 3.4.1 is inoperable for more than the time specified, the plant must be placed in Hot Shutdown. ITS 3.7.8 Required Action B.1, requires a component which is inoperable for more than the time specified, the plant must be placed in MODE 3. The difference between the CTS definition of HOT SHUTDOWN and the ITS definition of MODE 3 represents a small change which is considered administrative.	3.7.8	3.4.2 3.4.3
3.7.8 A.5	CTS 3.4.3 states "....Continued power operation with one component out of service shall be as specified in Section 3.4.2, with the permissible period in inoperability starting at the time that the first of the two components became inoperable." This explanatory information on the usage rules of technical specifications is addressed in the ITS Section 1.3, "Completion Times," and is not addressed in the Actions of ITS 3.7.8. This is an administrative change.	3.7.8	3.4.2 3.4.3
3.7.8 A.6	A Note is added to ITS SR 3.7.8.1 to aid the operator in the prevention of entering an inappropriate LCO. The Note reminds the operator that loss of SWS flow to a component may render that component inoperable but does not affect the OPERABILITY of the SWS System. This change is administrative in that it is a clarifier to the operator to prevent confusion.	SR 3.7.8.1	N/A
3.7.8 A.7	CTS 4.2 Table 4.2.2 item 6, specifies in part that for the Service Water System (SWS) valve tests, operation of the system is initiated by specific actuation signals from the normal actuation instrumentation. ITS SR 3.7.8.2 adds the following phrase, "...by an actual or simulated actuation signal." This is acceptable because the channel being tested cannot differentiate between an actual or simulated signal and either initiation can demonstrate system Operability. This is an administrative change.	SR 3.7.8.2	Table 4.2.2 Item 6

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.7.8 A.8	CTS 4.6.5b requires that each valve in the Containment Air Cooling System required to function during accident conditions will be exercised at intervals not to exceed three months. Valves required to function during an accident are classified as Safety Related Components and as such, are required to be tested in accordance with 10 CFR 50.55a. The ITS do not contain this requirement because it is controlled by ITS 5.5.7, "Inservice Testing Program." This is an administrative change.	3.7.8	4.5.6b
3.7.9 Ultimate Heat Sink (UHS)			
3.7.9 A.1	This change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.7.9	3.5.2
3.7.10 Control Room Ventilation (CRV) Filtration			
3.7.10 A.1	This change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.7.10	3.14
3.7.10 A.2	The CTS definition of Refueling Operations is equivalent to the ITS definition of Core Alterations. ITS "Core Alterations" is used to simply replace CTS "Refueling Operation." This is an administrative change.	1.0 3.7.10	1.0 3.14
3.7.10 A.3	CTS 3.14.1 requires that with the Required Action and associated Completion Time of Action A not met, the plant must be placed in HOT SHUTDOWN. ITS 3.7.10 Required Action B.1 requires that the plant be in MODE 3 if Required Action A.1 and its associated Completion Time are not met. The difference between the CTS definition of HOT SHUTDOWN and the ITS definition of MODE 3 represents a small change which is considered administrative.	3.7.10	3.14.1
3.7.10 A.4	CTS 3.14.1 requires that with the Required Action and associated Completion Time of Action A not met, the plant must be placed in COLD SHUTDOWN. ITS 3.7.10 Required Action B.2 requires that the plant be in MODE 5 if Required Action A.1 and its associated Completion Time are not met. The difference between the CTS definition of COLD SHUTDOWN and the ITS definition of MODE 5 represents a small change which is considered administrative.	3.7.10	3.14.1
3.7.10 A.5	CTS 3.14.1 Applicability requires compliance with the LCO for operation above COLD SHUTDOWN. COLD SHUTDOWN is similar to MODE 5. ITS 3.7.10 Applicability requires compliance in MODES 1, 2, 3, and 4. This is an administrative change.	3.7.10	3.14.1

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.7.10 A.6	CTS 4.2, Table 4.2.3 requires CRV Filtration to be able to maintain ≥1/8 inch water gauge relative to outside atmosphere during emergency mode operation. ITS SR 3.7.10.5 requires CRV Filtration to be able to maintain 0.125 inch water gauge relative to the adjacent area during emergency mode operation. The two sentences are equivalent. This is an administrative change.	SR 3.7.10.5	Table 4.2.3
3.7.10 A.7	CTS 4.2, Table 4.2.3 requires CRV Filtration to be able to automatically switch to the emergency mode of operation with flow through the HEPA filter and charcoal adsorber on a containment high-pressure and high-radiation test signal. ITS SR 3.7.10.3 changes the test signals to an actual or simulated actuation signal. This is acceptable because the channel being tested cannot differentiate between an actual or simulated signal. This is an administrative change.	SR 3.7.10.3	Table 4.2.3
3.7.10 A.8	CTS 4.2, Table 4.2.3 requires CRV Filtration be tested every refueling cycle. ITS SRs 3.7.10.3 and 3.7.10.4 require CRV Filtration be tested every 18 months. Palisades refueling cycle is approximately 18 months which is basically the same time frame. This is an administrative change.	3.7.10	Table 4.2.3
3.7.11 Control Room Ventilation (CRV) Cooling			
3.7.11 A.1	This change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.7.11	3.14.2
3.7.11 A.2	The CTS definition of Refueling Operations is equivalent to the ITS definition of Core Alterations. ITS "Core Alterations" is used to replace CTS "Refueling Operation." This is an administrative change.	3.7.11	3.14.2
3.7.11 A.3	CTS 3.14.2 requires that with the Required Action and associated Completion Time of Action A not met the plant must be placed in HOT SHUTDOWN. ITS 3.7.11 Required Action B.1 requires that the plant be in MODE 3 if Required Action A.1 and its associated Completion Time are not met. The difference between the CTS definition of HOT SHUTDOWN and the ITS definition of MODE 3 represents a small change which is considered administrative.	3.7.11 Required Action B.1	3.14.2
3.7.11 A.4	CTS 3.14.2 requires that with the Required Action and associated Completion Time of Action A not met the plant must be placed in COLD SHUTDOWN. ITS 3.7.11 Required Action B.2 requires that the plant be in MODE 5 if Required Action A.1 and its associated Completion Time are not met. The difference between the CTS definition of COLD SHUTDOWN and the ITS definition of MODE 5 represents a small change which is considered administrative.	3.7.11 Required Action B.2	3.14.2

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.7.11 A.5	CTS 3.14.2 Applicability requires compliance with the LCO for operation above COLD SHUTDOWN. COLD SHUTDOWN is similar to MODE 5. ITS 3.7.11 Applicability requires compliance in MODES 1, 2, 3, and 4. This is an administrative change.	3.7.11	3.14.2
3.7.12 Fuel Handling Area Ventilation System			
3.7.12 A.1	This change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.7.12	3.8
3.7.12 A.2	CTS 3.8.4 requires that the ventilation system and charcoal filter be in operation during specified conditions. LCO 3.7.12 requires the ventilation system to be operable with one exhaust fan aligned to the emergency filter bank and in Operation. This is an administrative change.	3.7.12	3.8.4
3.7.12 A.3	The CTS definition of Refueling Operations is equivalent to the ITS definition of Core Alterations. ITS "Core Alterations" is used to replace CTS "Refueling Operation." This is an administrative change.	3.7.12	3.8.4
3.7.12 A.4	CTS 3.8.4 requires fuel movements be terminated if both (Fuel Handling Area exhaust) fans are unavailable "until one fan is returned to service." ITS 3.7.12, Condition A, also requires fuel movements be suspended if the Fuel Handling Area Ventilation system is not in operation (i.e., one exhaust fan running) but, does not contain the stipulation "until one fan is returned to service." This is an administrative change.	3.7.12 Condition A	3.8.4
3.7.13 Engineered Safeguards Room Ventilation (ESRV) Dampers			
3.7.13 A.1	This change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.7.13	3.17
3.7.14 Spent Fuel Pool (SFP) Water Level			
3.7.14 A.1	This change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.7.14	5.4
3.7.15 Spent Fuel Pool (SFP) Boron Concentration			
3.7.15 A.1	This change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.7.15	5.4.2 4.2

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.7.15 A.2	CTS 5.4 has no Basis. A revised Bases that reflects the format and applicable content consistent with STS is provided for ITS 3.7.15. This is an administrative change.	3.7.15 Bases	5.4
3.7.15 A.3	CTS 5.4.2f lists a requirement of a minimum of 1720 ppm boron in the SFP. ITS LCO 3.7.15 states this same limit. This is an administrative change, consistent with STS.	3.7.15	5.4
3.7.15 A.4	The CTS 5.4 is a design feature and does not contain an LCO for boron concentration; therefore, CTS 3.0.3 would not be applicable. ITS 3.7.15 does contain an LCO for boron concentration and also contains a Note which states LCO 3.0.3 is not applicable. This is an administrative change.	3.7.15	5.4
3.7.16 Spent Fuel Assembly Storage			
3.7.16 A.1	This change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.7.16	5.4.2
3.7.17 Secondary Specific Activity			
3.7.17 A.1	This change reformats, renumbers and rewords the CTS with no change of intent to be consistent with STS.	3.7.17	3.1.5 4.2
3.7.17 A.2	The Bases of the CTS for this section have been completely replaced by revised Bases that reflect the format and applicable content consistent with STS.	3.7.17 Bases	4.2 Basis
3.7.17 A.3	CTS 3.1.5c requires that with specific activity of the secondary coolant >0.1 μCi/gram DOSE EQUIVALENT I-131, the plant must be placed in HOT SHUTDOWN. In ITS 3.7.17 Required Action A.1, the CTS term is replaced with MODE 3. The difference between the CTS definition of HOT SHUTDOWN and the ITS definition of MODE 3 represents a small change which is considered administrative.	3.7.17	3.1.5c
3.7.17 A.4	CTS 3.1.5c requires that with specific activity of the secondary coolant >0.1 μCi/gram DOSE EQUIVALENT I-131, the plant must be placed in COLD SHUTDOWN. In ITS 3.7.17 Required Action A.2, the CTS term is replaced with MODE 5. The difference between the CTS definition of COLD SHUTDOWN and the ITS definition of MODE 5 represents a small change which is considered administrative.	3.7.17	3.1.5c

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.7.17 A.5	CTS 3.1.5c requires that with specific activity of the secondary coolant >0.1 μCi/gram DOSE EQUIVALENT I-131, the plant must be placed in COLD SHUTDOWN. ITS 3.7.17 requires the same specific activity in MODES 1, 2, 3, and 4. Placing the plant in COLD SHUTDOWN in CTS and having the Applicability in MODES 1, 2, 3, and 4 in ITS is equivalent. This is an administrative change.	3.7.17	3.1.5c

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.8 ELECTRICAL POWER SYSTEMS **3.8.1 AC SOURCES - OPERATING**		
3.8.1 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	3.8.1	3.7.1 4.7.1
3.8.1 A.2	The proposed change revises the presentation of the CTS 4.7.1 statement that states; "Momentary transients outside the specified load range..." that appllies globally to AC power source tests. However, this actually applies only to selected surveillances since some do not state a load range. The ITS presents this as a note specifically for each Surveillance to which it is applicable, with no technical change or change of intent, and is consistent with the STS.	SR 3.8.1.3 SR 3.8.1.8	4.7.1
3.8.1 A.3	The proposed change adds a NOTE to ITS LCO 3.8.1 Condition D, requiring entry into applicable Conditions and Required Actions of ITS LCO 3.8.9 Distribution Systems if one train is de-energized, rather than specify those additional Actions in this AC Source specification. In the case of an inoperable electrical power source with a de-energized distribution system, additional Actions may be required to assure continued safe operation. This is an administrative change with no impact on safety because the new requirement is consistent with a reasonable interpretation of the CTS.	LCO 3.8.1 Condition D	N/A
	3.8.2 AC SOURCES - SHUTDOWN		
3.8.2 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	3.8.2	3.7.2
3.8.2 A.2	A NOTE is added to the proposed ITS LCO 3.8.2 Condition A for the required offsite circuit (the support system) requiring entry into applicable Conditions and Required Actions of ITS LCO 3.8.10 Distribution Systems (the supported system), if one train is de-energized. In the case of an inoperable electrical power source with a de-energized distribution system, the additional Actions of LCO 3.8.10 may be required to assure continued safe operation. This is an administrative change with no impact on safety because the new requirement is consistent with a reasonable interpretation of the CTS.	LCO 3.8.2 Condition A	N/A

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.8.3 DIESEL FUEL, LUBE OIL, AND STARTING AIR			
3.8.3 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	3.8.3	3.7.1.G 3.7.1.H 3.7.1.I 3.7.3
3.8.3 A.2	A NOTE is added to ITS 3.8.3 Actions allowing separate entry for each DG. This provides explicit instructions for proper application of the Actions for Technical Specifications compliance. In conjunction with proposed Specification 1.3, "Completion Times," the Note provides direction consistent with the intent of CTS. These changes are presentation preferences consistent with the STS. Therefore, this is an administrative change with no impact on safety.	3.8.3 Actions	N/A
3.8.3 A.3	The proposed change adds the "fuel oil transfer system" and "starting air subsystem" to form a foundation for ITS LCO 3.8.3. This change has been made to establish a format consistent with the ISTS by specifying, in the LCO, the functional capability of DG support systems required for the safe operation of the facility. This change does not change the requirements of the CTS; therefore, it is an administrative change with no impact on safety	LCO 3.8.3	N/A
3.8.4 DC SOURCES - OPERATING			
3.8.4 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	3.8.4	3.7.4
3.8.5 DC SOURCES - SHUTDOWN			
3.8.5 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	3.8.5	3.7.5
3.8.6 BATTERY CELL PARAMETERS			
3.8.6 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	3.8.6	3.7.6

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.8.6 A.2	CTS 3.7.6 is reformatted to form a foundation for the proposed ITS 3.8.6. The change consists of rearranging the required battery cell parameters exclusively to associated Surveillances. Because the requirements are unchanged, and the presentation is consistent with the Writer's Guide for the STS, this change is considered administrative.	3.8.6	3.7.6
3.8.6 A.3	The proposed change adds a NOTE to ITS 3.8.6 Actions allowing separate entry for each battery. This provides explicit instructions for proper application of the Actions for Technical Specifications compliance. In conjunction with proposed Specification 1.3, "Completion Times," the Note provides direction consistent with the intent of CTS. These changes are presentation preferences consistent with the STS; therefore, this is an administrative change with no impact on safety.	3.8.6 Actions	N/A
3.8.7 INVERTERS - OPERATING			
3.8.7 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	3.8.7	3.7.7
3.8.8 INVERTERS - SHUTDOWN			
3.8.8 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	3.8.8	3.7.8
3.8.9 DISTRIBUTION SYSTEMS - OPERATING			
3.8.9 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	3.8.9	3.7.9
3.8.9 A.2	The proposed change removes the action from CTS 3.7.9.A.1, B.1, and C.1 which informs the operator to comply with other required actions if applicable. Because the other required actions are required to be met, regardless of this statement, this statement does not provide specific action. Therefore, it serves only as an informational note, that does not appear in the ITS. This is an administrative change with no technical change or change in intent.	N/A	3.7.9.A.1 3.7.9.B.1 3.7.9.C.1
3.8.9 A.3	CTS 3.7.9.E is revised to form a foundation for ITS 3.8.9 Condition E. Since both specifications require a plant shutdown when a loss of safety function exists due to degradation of the electrical distribution system; the requirements of the CTS and ITS are essentially equivalent. The rewording does not alter the original intent of the CTS; therefore, this change is considered administrative.	3.8.9 Condition E	3.7.9.E

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.8.10 DISTRIBUTION SYSTEMS - SHUTDOWN		
3.8.10 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	3.8.10	3.7.10
3.8.10 A.2	CTS 3.7.10.A Action 2.5 is revised to form a foundation for ITS 3.8.10 Required Action A.2.5, containing the phrase "and not in operation" which is not in the CTS. Since LCO 3.0.6 would be inappropriate in this instance, inclusion of this phrase assures that appropriate actions are taken in the event primary coolant circulation and heat removal functions are lost as a result of an electrical distribution system inoperability. The proposed change does not alter the CTS requirement, but simply addresses each aspect (i.e., Operable, and in operation) related to a loss of the shutdown cooling function.	3.8.10 Required Action A.2.5	3.7.10.A Action 2.5

TABLE A - ADMINISTRATIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.9.1 BORON CONCENTRATION		
3.9.1 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	3.9.1	3.8.2
3.9.1 A.2	The CTS Bases 3.9.1 was reorganized and reformatted to reflect the format and applicable content consistent with the STS. This is an administrative change, editorial in nature, and does not affect the technical content or operational requirements.	B 3.9.1	B 3.9.1
3.9.1 A.3	CTS 3.8.2 was revised and reformatted to provide the foundation for the proposed ITS 3.9.1, Condition A. Although the exact wording of the CTS and ITS are not the same, the intent of both the CTS and ITS is to immediately suspend any activity which may result in the addition of positive reactivity, and to immediately initiate actions to restore the boron concentration within the specified limit. Therefore, the revised wording of CTS 3.8.2 is considered editorial. This change is acceptable because it does not affect the technical content or operational requirements and presents the requirement(s) in the ITS in a format consistent with that of the STS.	3.9.1, Condition A	3.8.2
	3.9.2 NUCLEAR INSTRUMENTATION		
3.9.2 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	3.9.2	3.8.1 3.8.2
3.9.2 A.2	CTS B 3.9.2 was reorganized and reformatted to reflect the format and applicable content consistent with the STS. This is an administrative change, editorial in nature, and does not affect the technical content or operational requirements.	B 3.9.2	B 3.9.2
3.9.2 A.3	CTS 3.8.1.e was revised and reformatted to provide the foundation for the proposed ITS 3.9.2. Although CTS 3.8.1e only requires one source range neutron monitor to be in service when core geometry is not being changed, two neutron flux monitors are still required to be Operable by CTS 3.17.6 item 1. The requirements of ITS 3.9.2 are equivalent to CTS 3.8.1e and 3.17.6 requirements. In proposed ITS 3.9.2, two source range channels are required to be Operable whenever the plant is in MODE 6. This change is administrative because it is editorial in nature, and does not affect technical content or operational requirements.	3.9.2	3.8.1e 3.17.6 (Item 1)

TABLE A - ADMINISTRATIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.9.2 A.4	CTS 3.8.2 was revised and reformatted to provide the foundation for the proposed ITS 3.9.2, Required Actions A.1, A.2 and B.1. Although the exact wording of the CTS and ITS are not the same, the intent of both the CTS and ITS is to immediately suspend any activity which may result in the addition of positive reactivity, and to immediately initiate actions to restore the required number of neutron flux monitors to an Operable status. Therefore, the revision of CTS 3.8.2 is editorial in nature and is classified as administrative. The change is acceptable because it does not affect the technical content or operational requirements.	3.9.2	3.8.2
	3.9.3 CONTAINMENT PENETRATIONS		
3.9.3 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	3.9.3	3.8.1 3.8.2
3.9.3 A.2	CTS Bases 3.9.3 was reorganized and reformatted to reflect the format and applicable content consistent with the STS. This is an administrative change, editorial in nature, and does not affect the technical content or operational requirements.	B 3.9.2	B 3.9.2
3.9.3 A.3	CTS 3.8. Applicability was revised and reformatted to provide the foundation for the proposed ITS 3.9.3 Applicability. Although the wording of the CTS applicability and ITS Applicability are not exact, the intent of both the CTS and ITS is to address the condition where the potential exists for a fuel handling accident. This is an administrative change because it does not affect technical content or operational requirements.	3.9.3	3.8
3.9.3 A.4	CTS 3.8.1a was revised to provide the foundation and clarification for the proposed ITS LCO 3.9.3b. The requirement that "one door in the personnel air lock be closed" has been added for clarity. The addition of this requirement does not change the original intent of the CTS requirement but clarifies the way the LCO can be met. Therefore, this change is considered administrative because it does not affect technical content or operational requirements.	3.9.3b	3.8.1a
3.9.3 A.5	CTS 3.8.2 was revised and reformatted to provide the foundation and clarification of proposed ITS LCO 3.9.3, Condition A. This is an administrative change, editorial in nature and does not affect the technical content or operational requirements.	3.9.3	3.8.2

TABLE A - ADMINISTRATIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.9.3 A.6	CTS 3.8.2 was revised to delete a statement of initiating work or operations that may change the reactivity of the core if the containment air lock doors or containment isolation valves are not in their required positions. Deletion of this statement is administrative since restoration of the inoperable component and subsequent compliance with the LCO is only required when the plant is in the specified Mode of Applicability. This change is acceptable because it does not affect technical content or operational requirements.	N/A	3.8.2
3.9.3 A.7	ITS 3.9.3a incorporates conventions from the STS to provide the foundation for ITS 3.9.3a and the associated Note regarding compliance with LCO 3.7.12 and the equipment hatch being "held in place by four bolts." This is an administrative change because it does not impose any additional requirements, but simply establishes a convention similar to the STS while maintaining the allowance for equipment hatch operation presently contained in the CTS. Specifying that the equipment hatch be held closed by four bolts is based on good engineering practice and has been adopted from the STS. This change is acceptable because it does not affect technical content or operational requirements.	3.9.3a	N/A
3.9.4 SHUTDOWN COOLING (SDC) AND COOLANT CIRCULATION - HIGH WATER LEVEL			
3.9.4 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	3.9.4	3.1.9 3.8.1
3.9.4 A.2	CTS Bases 3.9.4 was revised to reflect the format and applicable content consistent with the STS. This is an administrative change because it reorganizes and reformats information that is editorial in nature and does not affect the technical content or operational requirements of this specification.	B 3.9.4	B 3.9.4
3.9.4 A.3	CTS 3.1.9.3 requirements were revised and reformatted to provide the foundation for proposed ITS 3.9.4 requirements. These CTS 3.9.4 changes were editorial and support presentation of the ITS structure. This change is acceptable because it does not modify the requirements of the CTS.	3.9.4	3.1.9.3
3.9.4 A.4	CTS 3.8.1f was revised and provides the foundation for and consistency with ITS 3.9.4. This is an administrative change because CTS 3.8.1f and CTS 3.1.9.3 establish requirements that are equivalent to those specified in ITS 3.9.4. This change is acceptable because it does not affect the technical content or operational requirements.	3.9.4	3.8.1f 3.1.9.3

TABLE A - ADMINISTRATIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.9.4 A.5	CTS 3.8.2 required actions were revised and reformatted to provide the foundation for Proposed ITS 3.9.4 Required Actions A.1, A.2 and A.3. Although the exact wording of the CTS 3.8.2 and ITS 3.9.4 are not the same, the intent of both the CTS and ITS is to immediately suspend any activity which may result in the addition of positive reactivity, immediately suspend loading irradiated fuel assemblies in the core, and to immediately initiate actions to restore compliance with the LCO. This is an administrative change because revising the wording in CTS 3.8.2 is editorial and does not affect the technical content or operational requirements.	3.9.4	3.8.2
3.9.5 SHUTDOWN COOLING (SDC) AND COOLANT CIRCULATION - LOW WATER LEVEL			
3.9.5 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	3.9.5	3.9.5
3.9.5 A.2	CTS 3.1.9.3 Applicability was reformatted and reworded. The applicability of CTS 3.1.9.3 encompasses the applicability of ITS 3.9.5 since the CTS essentially addresses a plant condition equivalent to MODE 5 in the ITS (cold shutdown) and remains in affect as long as fuel is in the reactor. The ITS contains separate specifications to address SDC train requirements in MODE 5 (ITS 3.4.8)and MODE 6 (ITS 3.9.5). The changes are editorial and do not modify the requirements of the CTS. Therefore, these are administrative changes.	3.9.5	3.1.9.3
3.9.5 A.3	CTS 3.1.9.3 2b adds the Required Action A.2 to ITS 3.9.5. Although the presentation of the Required Actions in the ITS is different from that in the CTS, the intent of the ITS and CTS are the same since both documents prescribe similar methods to restore compliance by taking action that makes the LCO not applicable, i.e., for CTS 3.19.3 2b and ITS, 3.9.5 A.2. The changes associated with CTS 3.1.9.3 are administrative because they do not modify the requirements of the CTS and support presentation of the ITS structure.	3.9.5 A.2	3.1.9.3 2b

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	4.0 DESIGN FEATURES		
4.0 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	4.0	5.0
4.0 A.2	CTS 5.3.2d is revised in the ITS 4.2.2 to include, "The control material shall be silver-indium-cadmium as approved by the NRC." This is the material in the Palisades control rods and is discussed in the FSAR. Therefore, this proposed change imposes no new requirements and is considered an administrative change.	4.2.2	5.3.2d
4.0 A.3	CTS 5.3.2b is revised in ITS 4.2.1 to include the substitution of filler rods for fuel rods. As stated in the ITS, changes must be in accordance with approved applications using NRC staff approved codes and methods. Adding this statement clarifies that these changes must be done with an NRC approved methodology. Guidance on this subject was provided in NRC Generic Letter 90-02 and a subsequent Supplement 1 which provided staff clarification. This administrative change clarifies the NRC expectations and requirements and is consistent with the STS.	4.2.1	5.3.2b
4.0 A.4	The CTS 5.1 is revised from, "The Palisades reactor shall be located on...." to "The Palisades Nuclear Plant is located on...." in the ITS 4.1. This change more appropriately reflects the plant name. In addition, "shall be" is changed to "is" to improve the sentence and to reflect that the Palisades Nuclear Plant has already been built. This an administrative changes because no requirements have changed.	4.1	5.1
4.0 A.5	ITS Section 4.3.2 has been added to include inadvertent drainage of the spent fuel storage pool because the Palisades CTS does not address inadvertent draining. The suction and discharge piping of the cooling system for the storage pool is designed to prevent inadvertent draining. The discharge piping is at 647' and contains a siphon breaker. The bottom of the suction piping is at elevation 644' - 5." Since these piping arrangements are permanent plant features, and no additional operational requirements have been imposed on Palisades with the inclusion of this information in the ITS, this is an administrative change.	4.3.2	N/A

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
4.0 A.6	he proposed change revises CTS Section 5.4.1a to replace the reference to Siemens Nuclear Power Corporation Report EMF-91-1421 (NP) for the appropriate conservatism used in the calculation of K_{eff} with a reference to FSAR Section 9.11 in ITS 4.3.1.3. This is an administrative change because it does not alter the design or analysis assumptions of the new fuel storage racks, but simply revises the reference of the document which contains the uncertainties used in the determination of K_{eff}.	4.3.1.3b	5.4.1a
4.0 A.7	ITS Section 4.3.3 is a new Section which has been added to the ITS on spent fuel storage pool capacity. This descriptive change does not contain any requirements and does not result in a change of technical content; therefore, this is considered an administrative change.	4.3.3	N/A

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	5.0 ADMINISTRATIVE CONTROLS		
5.0 A.1	The proposed change reformats, renumbers and rewords the CTS with no change of intent to be consistent with the STS.	5.0	6.0
5.0 A.2	CTS 6.1.2, 6.2.2a and 6.2.2b are revised to apply the format and concept of MODES in the STS to form a foundation for ITS 5.1.2 and 5.2.2.	5.1.2 5.2.2	6.1.2 6.2.2
5.0 A.3	CTS 6.2.2a is revised in the ITS 5.2.2 to reflect that the Palisades Nuclear Plant has only one reactor and one control room. This is considered an administrative change because no technical requirements have changed.	5.2.2	6.2.2a
5.0 A.4	CTS 6.2.2b, 6.2.2g, and 6.5.4d use the term "unit" when discussing the reactor. The typical term used in the remainder of the CTS is "plant." Therefore, the term "plant" is used in ITS 5.2.2. This is an administrative change to reflect the typical Palisades Nuclear Plant terminology.	5.2.2	6.2.2b 6.2.2g 6.5.4d
5.0 A.5	CTS 6.4.1 requires that written procedures be established, implemented, and maintained for item b., "Refueling operations" and item c., "Surveillance and test activities of safety-related equipment." These procedures are required by ITS 5.4.1a reference to Regulatory Guide 1.33, Revision 2, February 1978. This change maintains consistency with the STS.	5.4.1a	6.4.1b 6.4.1c
5.0 A.6	CTS 6.4.1 requires that written procedures be established, implemented, and maintained for item f., "Site Security Plan implementation" and item g., "Site Emergency Plan implementation." The NRC Generic Letter 93-07, recommended that these specifications be removed from the Technical Specifications because they are duplicative of regulations in the Code of Federal Regulations, Parts 50 and 73. This is an administrative change.	N/A	6.4.1f 6.4.1g
5.0 A.7	CTS 6.5.7 is entitled "Inservice Inspection and Testing Program." In ITS 5.5.7, the title is changed to the "Inservice Testing Program." This change is considered an administrative change because the requirements of the program are unchanged.	5.5.7	6.5.7
5.0 A.8	CTS 6.6.5 is revised to include ITS LCO 3.1.1 "Shutdown Margin" as a limit that is established and maintained in the COLR to form a foundation for ITS 5.6.5. This is an administrative change because it does not alter any requirement of the CTS, but simply provides conforming information. This change is consistent with the STS as modified by TSTF-9.	5.6.5	6.6.5

TABLE A - ADMINISTRATIVE CHANGES (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
5.0 A.9	CTS 6.6.8 is revised to delete references to "Liner and Penetration tests." Reference to these tests has been deleted because the requirement for these tests was removed from the CTS by Amendment 109, dated October 28, 1987. Therefore, it is no longer necessary to reference these tests in the ITS.	N/A	6.6.8
5.0 A.10	CTS 4.5.6 is modified to form a foundation for ITS 5.5.5, and includes a reference to ITS 5.6.7, "Containment Structural Integrity Surveillance Report." This change clarifies the reporting requirements associated with the dome delamination inspection and imposes no additional restrictions on plant operation.	5.5.5	4.5.6
5.0 A.11	CTS 6.5.8, "Steam Generator Tube Surveillance Program," and CTS 6.5.11, "Fuel Oil Testing Program," are revised to provide statements of applicability for SR 3.0.2 and SR 3.0.3, respectively. These statements provide clarity and ensure consistent application of these requirements for the Programs referenced by ITS SRs. This change is consistent with the STS as modified by TSTF-118.	5.5.8 5.5.11	6.5.8 6.5.11
5.0 A.12	CTS 6.6.1, "Occupational Radiation Exposure Report," and CTS 6.6.3, "Radioactive Effluent Release Report," are revised to incorporate language relevant to revision of 10 CFR Part 20, and 10 CFR 50.36a. There is no change in the application of the requirements; therefore, the changes to the specifications are administrative. This change is consistent with the STS as modified by TSTF-152.	5.6.1 5.6.3	6.6.1 6.6.3
5.0 A.13	The CTS 6.6.4, "Monthly Operating Report," is revised to omit the words "to arrive" in order to form a foundation for ITS 5.6.4. This is an administrative change because it has no effect on plant operations and impacts only the submittal of after-the-fact information.	5.6.4	6.6.4
5.0 A.14	The proposed change adds words to CTS 6.5.14 regarding application of 10 CFR 50 Appendix J testing requirements (e.g., III.D.2.(b)(ii)) that are applicable "when containment integrity is required by the plant's Technical Specifications." The proposed change forms a foundation for ITS 5.5.14.	5.5.14	6.5.14

TABLE M - MORE RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	2.0 SAFETY LIMITS (SLs)		
2.0 M.1	The proposed change adds a Linear Heat Rate (LHR) limit to ITS 2.1.1.2, which is not included in the CTS. It is included in the ITS because the peak LHR is an assumption of the safety analysis. This is consistent with the STS.	2.1.1.2	N/A
2.0 M.2	The proposed change revises the CTS 2.1 and 2.2 requirements to shut down the reactor "immediately" to the more definitive "restore compliance and be in MODE 3 within 1 hour." This requirement is applied to the ITS 2.2.1 and .2.2.2. Since the CTS usage of the term "immediately" is subject to interpretation and variables, the explicit requirement in the ITS is considered "more restrictive."	2.2.1 2.1.2	2.1 2.2
2.0 M.3	ITS 2.2.2.2 adds the requirements , "In MODE 3, 4, 5, or 6 restore compliance within 5 minutes" when a SL is violated. Since CTS 2.2.1 does not specify that compliance be restored, the explicit requirement in the ITS is considered "more restrictive."	2.2.2.2	2.2.1

TABLE M - MORE RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.0 LCO & SR APPLICABILITY		
3.0 M.1	The proposed change decreases the Action time to be subcritical and cooldown from that allowed in the CTS. It is classified as more restrictive as the result of an explicit comparison of the differences between the CTS plant condition descriptions of HOT STANDBY, HOT SHUTDOWN and COLD SHUTDOWN and ITS MODE 3, MODE 4 and MODE 5 respectively. This comparison is made to form a foundation for ITS LCO 3.0.3. In each of these instances, it is concluded that the conversion from the CTS plant conditions to the ITS MODES results in a more restrictive change due to the shorter element of time allowed to achieve a certain plant condition. The ITS LCO 3.0.3 is consistent with the STS.	LCO 3.0.3	3.0.3
3.0 M.2	This proposed change completely replaces the text of CTS (SR)4.0.3 to facilitate the conversion to ITS SR 3.0.3. Although the concept; 'that if it is identified that a surveillance has not been performed, a delay in taking the required actions is allowed' is presented in the CTS (SR)4.0.3, the conversion to the ITS SR 3.0.3 results in a more restrictive change. In the majority of situations, the CTS (SR)4.0.3 will allow more time than ITS SR 3.0.3 since, in the CTS, a minimum of 24 hours is given in all situations whereas, the ITS SR 3.0.3 will only allow 24 hours if the frequency is greater than or equal to 24 hours. The ITS SR 3.0.3 is consistent with the STS.	SR 3.0.3	4.0.3

TABLE M - MORE RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.1 REACTIVITY CONTROL SYSTEMS **3.1.1 SHUTDOWN MARGIN (SDM)**		
3.1.1 M.1	CTS 3.10.1 does not specify an action if the shutdown margins it specifies are not met. Therefore, if they are not met, the plant would have to enter LCO 3.03. ITS LCO 3.1.1 requires that boration start within 15 minutes. Initiating boration to restore the required amount of SHUTDOWN MARGIN is the appropriate action to take in this situation to return the plant to a safe condition. Therefore, since the ITS LCO require that action be taken within 15 minutes, it is a more restrictive action, which is consistent with the STS.	LCO 3.1.1	3.10.1
3.1.1 M.2	The Palisades Nuclear Plant CTS does not contain an explicit surveillance requirement for SHUTDOWN MARGIN even though there was a requirement that the limits be met as specified in 3.10.1. ITS 3.1.1 adds SR 3.1.1.1 to verify SHUTDOWN MARGIN "every 24 hours." Since the requirement to verify SHUTDOWN MARGIN was not explicitly required in the CTS, the addition of the Frequency is a more restrictive change.	SR3.1.1.1 SR3.1.1.2	N/A
3.1.1 M.3	CTS 3.10.7 includes an exception which allows a deviation from the requirement for shutdown margin during performance of CRDM exercises. ITS 3.1.1 does not contain this same exception since violation of the LCO is not expected during the performance of the control rod drive exercise surveillance (SR 3.1.4.4). The small change in reactivity due to the surveillance is not enough to cause a violation of the Shutdown Margin requirements of ITS 3.1.1. Thus, reliance on the exception contained in CTS 3.10.7 is not needed. This change is more restrictive.	LCO 3.1.1	3.10.7

TABLE M - MORE RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.1.2 REACTIVITY BALANCE		
3.1.2 M.1	CTS 4.10, Reactivity Balance, specifies that if a reactivity anomaly is identified that "the Atomic Energy Commission shall be notified within 24 hours and an evaluation as to the cause of the discrepancy shall be made and reported to the Atomic Energy Commission within 30 days" and does not require any ACTIONS. (The removal of the notification and reporting requirements from the TS is discussed in change LA.1). The CTS requires that an evaluation of the cause of the discrepancy shall be made; no time frame is listed other than the 30 day report. In the ITS, two ACTIONS are identified that must be completed within 7 days. These ACTIONS (to evaluate the core for continued operation and to establish appropriate operating restrictions and SRs) are More Restrictive than allowed by the CTS since the "evaluation" is more specific and, in addition, the ITS require operating restrictions and surveillances to be established within 7 days as compared to the CTS requirement to file a report within 30 days. These changes are consistent with the STS as modified by TSTF-142.	3.1.2 Required Action A.1 Required Action A.2	4.10
3.1.2 M.2	CTS 4.10, Reactivity Balance, does not specify any Required Actions if the CTS Actions are not met. The ITS adds a Condition B which requires that if the ACTIONS and Associated Completion Time of Condition A are not met, the power level shall be reduced below the MODE of Applicability (taken to MODE 2) within 6 hours. This is more restrictive since this time to shut down, when combined with the cmpletion times (7 days) of Condition A, is shorter than the 30 day report time of the CTS. The ITS required ACTIONs are more specifically defined. This is a more restrictive change, consistent with the STS as modified by TSTF-141 and 142.	3.1.2 Required Action B	N/A
3.1.2 M.3	CTS 4.10 only requires that the boron concentrations be periodically compared to the predicted value, but does not specify a frequency. ITS SURVEILLANCE SR 3.1.2.1 requires verification that reactivity balance is within 1% Delta p prior to entering MODE 1 after fuel loading and every 31 EFPD thereafter. This change is more restrictive because the CTS does not define a frequency to perform the tests.	SR3.1.2.1 Frequency	4.10
	3.1.3 MODERATOR TEMPERATURE COEFFICIENT (MTC)		
3.1.3 M.1	CTS 3.12, Moderator Temperature Coefficient of Reactivity, does not have any ACTIONS specified if the MTC limit is not met. The only ACTION available would be to enter LCO 3.0.3 which would require the plant to be in a minimum of CTS "HOT STANDBY" in a total of 7 hours. The ITS ACTION A, if the MTC limit is not, met would be to enter MODE 3 within 6 hours. Since MODE 3 would be entered in 6 hours in the ITS versus the CTS "HOT STANDBY" in 7 hours, this is a more restrictive change.	3.1.3 Required Action A	3.12

TABLE M - MORE RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	SECTION# & TITLE		
3.1.4 M.1	The Palisades CTS do not include requirements for the rod position deviation alarm to be OPERABLE. The rod position deviation alarm is used to ensure that the rods are within their required alignment. The requirement for the rod position deviation alarm to be OPERABLE is included in the ITS LCO3.1.4. The addition of this requirement is a more restrictive change since the CTS do not require the rod position deviation alarm and is consistent with the STS.	LCO 3.1.4	3.10.4a
3.1.4 M.2	When more than one CONTROL ROD or part-length rod becomes misaligned or inoperable, CTS 3.10.4b requires that the reactor shall be placed in the hot shutdown condition within 12 hours. ITS LCO 3.1.4 changes "hot shutdown" to "MODE 3" which is operationally similar to the CTS Hot Shutdown condition (as is discussed in this report in DOC 3.1.1 A.1). The CTS completion time of 12 hours is reduced to 6 hours in the ITS to match similar shutdown requirements contained in the ITS. The change from 12 hours to 6 hours is a more restrictive change.	3.1.4 Required Action E	3.10.4b
3.1.4 M.3	If the rod position deviation alarm is inoperable, Condition B of the ITS requires that SR 3.1.4.1 (rod position verification) be performed within 15 minutes of movement of any control rod. The addition of this requirement is a more restrictive change because the CTS does not address requirements for the rod position deviation alarm.	3.1.4 Required Action B	N/A
3.1.4 M.4	ITS SR 3.1.4.4 requires verification, every 18 months, that the rod position deviation alarm is OPERABLE. This surveillance frequency is adequate for ensuring that the rod position deviation alarm remains OPERABLE because there are other rod position indications available to alert the operator if a position deviation has occurred. The addition of this requirement is a more restrictive change since the CTS do not include requirements for the rod position deviation alarm.	SR3.1.4.4	N/A
3.1.4 M.5	CTS 3.10.1d and 3.10.4b provide compensatory actions to allow operation with one control rod inoperable. ITS 3.1.4 requires the plant to be placed in MODE 3 whenever one or more control rods are inoperable for reasons other than a single control rod being immovable. This change is more restrictive and is consistent with the STS.	LCO 3.1.4 3.1.4 Condition D	3.10.1d 3.10.4b
3.1.4 M.6	CTS 3.10.4b provides the required actions if "more than one" control rod becomes inoperable, but does not specify any required action if one control rod becomes inoperable. The ITS 3.1.4 Condition D requires the Inoperable control rod be restored to Operable status prior to the next reactor startup. By incorporating Condition D in the ITS, an additional restriction is imposed on plant operation. Therefore, this change is more restrictive.	3.1.4 Required Action D	3.10.4

TABLE M - MORE RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.1.4 M.7	CTS 3.10.7 includes an exception which allows a deviation from the requirements for control rod alignments during performance of CRDM exercises. ITS 3.1.4 does not contain this same exception since violation of the LCO is not expected during the performance of the control rod drive exercise surveillance (SR 3.1.4.4). This change does not provide exceptions in the ITS to the requirements for control rod alignments; therefore this change is more restrictive.	LCO 3.1.4	3.10.7
3.1.4 M.8	CTS 3.17.6.21 specifies that "If any action required by 3.17.6.1 through 3.17.6.18 is not met AND the associated completion time has expired,... a) The reactor shall be placed in HOT SHUTDOWN within 12 hours, and b) The reactor shall be placed in a condition where the affected equipment is not required, within 48 hours. The ACTION E of ITS 3.1.4 require the same requirements be met within 6 hrs. Therefore, the ITS is more restrictive.	3.1.4 Required Action E	3.17.6.21
	3.1.6 REGULATING ROD GROUP POSITION LIMITS		
3.1.6 M.1	CTS 3.10.5a specifies that "The regulating groups shall be limited to the withdrawal sequence, overlap, and insertion limits specified in the COLR." However, no action is specified if the sequence or overlap limits are not met. ITS ACTION B.1 has been added to address this. ACTION B.1 requires the regulating rod groups to be within sequence or overlap limit within two hours. Two hours will provide sufficient time for the operator to take the appropriate action to return the regulating rods to within sequence and overlap limits. This is a more restrictive change because the CTS does not specify actions to take if the sequence or overlap limits are not met and is consistent with the STS Bases.	3.1.6 Required Action B.1	3.10.5a
3.1.6 M.2	When any action required by 3.17.6.1 through 3.17.6.18 is not met AND the associated completion time has expired, CTS 3.17.6.21 requires that the reactor be placed in HOT SHUTDOWN within 12 hours. ITS 3.1.6 ACTION D specifies that if Required Action and associated Completion Times are not met, the reactor shall be in MODE 3 within 6 hours. The CTS "HOT SHUTDOWN" and the ITS "MODE 3" are essentially operationally equivalent. The reduction of completion time from 12 hours in the CTS to six hours in the ITS is a more restrictive change and is consistent with the STS.	3.1.6 Required Action D	3.17.6.21

TABLE M - MORE RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.1.6 M.3	CTS Table 4.17.6, Item 13, requires performance of a CHANNEL FUNCTIONAL TEST and a CHANNEL CALIBRATION of the Control Rod Out Of Sequence (CROOS) alarm circuit every 18 months. ITS SR 3.1.6.3 requires verification that the CROOS alarm circuit is OPERABLE every 31 days. The equivalent of the CTS 18 month combined CHANNEL CALIBRATION/CHANNEL FUNCTIONAL test required by the CTS will be, as required by ITS SR 3.1.6.3, performed every 31 days. This is a more restrictive change and, since surveillance for the CROOS alarm is not contained in the STS, is consistent with the STS recommendations for the Power Dependant Insertion Limit (PDIL) alarm.	SR3.1.6.3	Table 4.17.6, Item 13
3.1.6 M.4	CTS Table 4.17.6 Item 18, PDIL alarm, is required to have a CHANNEL CALIBRATION performed every 18 months. In the ITS SR 3.1.6.2, this is changed to require verification PDIL alarm OPERABLE every 31 days. The ITS SR 3.1.6.2 requirement to verify the PDIL alarm OPERABLE every 31 days is a more restrictive change since it envelopes the CTS CHANNEL FUNCTIONAL TEST (including the set point verification) and the CHANNEL CALIBRATION.	SR 3.1.6.2	Table 4.17.6, Item 18

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July 12, 1999DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.3 INSTRUMENTATION **3.3.1 Reactor Protective System (RPS) Instrumentation**		
3.3.1 M.1	CTS Table 3.17.1 footnote (a) requires the ZPM Bypass removal channels to be Operable when the RPS is required and the associated bypasses are used. ITS Table 3.3.1-1 Item 12 requires those channels to be Operable whenever the RPS is required. Since the ITS applicability covers a wider range of conditions, this change is More Restrictive.	Table 3.3.1-1	Table 3.17.1
3.3.1 M.2	CTS 3.17.1.6 requires being in Hot Shutdown within 12 hours; and in a condition where the RPS is not required, within 48 hours, when the "number of Operable Channels" is less than the minimum required. ITS, in these conditions, requires entry into LCO 3.0.3. and to place the plant in Mode 3 within 7 hours; in Mode 4 within 31 hours; and in Mode 5 within 37 hours. This change will place the plant in a lower mode in a shorter time frame, and is more restrictive. This change is consistent with STS.	LCO 3.0.3	Required Action 3.17.1.6
3.3.1 M.3	CTS 3.17.1.6b requires the reactor to be in a condition where the affected equipment is not required within 48 hours. ITS 3.3.1, Condition G Actions require the same condition be achieved within 6 hours. Since the plant is required to be in a lower MODE in a shorter time frame, this change is considered more restrictive. This change is consistent with STS.	LCO 3.3.1 Required Actions G.	Required Action 3.17.1.6b
3.3.1 M.5	CTS Table 3.17.1 Footnote (c) allows changing the ZPM bypass setpoint from 10-4 % RTP to 10-1% RTP during Low Power Physics Testing. Since this allowance is not used, it is not included in the ITS. Since this change deletes an allowance, this change is more restrictive. This change is consistent with STS.	LCO 3.3.1	Table 3.17.1 Footnote (c)
3.3.1 M.6	ITS 3.3.1 Conditions B and C and their Required have been added for the Loss of Load and High Startup Rate Functions. CTS3.17.1 Actions applicable to single channel inoperability are not required for High Startup Rate and Loss of Load. This is a More Restrictive change because the ITS require restoration of an inoperable trip channel where the CTS do not.	LCO 3.3.1 Required Actions B and C	3.17.1

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July 12, 1999DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.3.2 Reactor Protective System (RPS) Logic and Trip Initiation		
3.3.2 M.1	ITS LCO 3.3.2, Condition D includes new actions not required by CTS, to be taken when two channels of Initiation Logic affecting the same trip leg are inoperable, which requires de-energizing the clutch power supplies immediately under this condition. This change is more restrictive and is consistent with STS.	3.3.2 Required Action D.1	3.17.1
3.3.2 M.2	CTS 3.17.1.6 requires being in Hot Shutdown within 12 hours, and in a condition where the RPS is not required within 48 hours, when the Required Action and associated Completion Times are not met. ITS require that the plant exit the Applicability within 6 hours. Since this change will require the plant to be in a lower MODE in a shorter time frame, this change is more restrictive. This change is consistent with STS.	LCO 3.3.2 Required Actions E	Required Action 3.17.1.6
	3.3.3 Engineered Safety Features (ESF) Instrumentation		
3.3.3 M.1	CTS 3.17.2.5 requires being in Hot Shutdown within 12 hours; and in a condition where the RPS is not required, within 48 hours, when the "number of Operable Channels" is less than the minimum required. ITS, in these conditions, requires entry into LCO 3.0.3. and to place the plant in Mode 3 within 7 hours; and in Mode 4 within 31 hours. This change will place the plant in a lower mode in a shorter time frame, and is more restrictive. This change is consistent with STS.	LCO 3.0.3	Required Actions 3.17.2.5 and 3.17.3.5
3.3.3 M.2	CTS 3.17.2.5 requires being in Hot Shutdown within 12 hours and place the reactor in a condition where the affected equipment is not required, within 48 hours, when any Required Action is not completed and the associated completion time has expired. ITS 3.3.3 D.1 and D.2 requires being in Mode 3 within 6 hours, and Mode 4 within 30 hours (exiting the applicability for functions addressed by CTS LCO 3.17.2). Since the completion time is shortened, this change is More Restrictive.	LCO 3.3.3 Required Actions D	Required Action 3.17.2.5
3.3.3 M.3	CTS 3.17.3.5 requires being in Hot Shutdown within 12 hours; and in a condition where the RPS is not required, within 48 hours, when the "number of Operable Channels" is less than the minimum required. ITS, in these conditions, requires entry into LCO 3.0.3. and to place the plant in Mode 3 within 7 hours; and in Mode 5 within 37 hours. This change will place the plant in a lower mode in a shorter time frame, and is more restrictive. This change is consistent with STS.	LCO 3.0.3	Required Action 3.17.3.5

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July 12, 1999DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.3.3 M.4	CTS 3.17.3.5 requires being in Hot Shutdown within 12 hours and place the reactor in a condition where the affected equipment is not required, within 48 hours, when any Required Action is not completed and the associated completion time has expired. ITS 3.3.3 E.1 and E.2require being in Mode 3 within 6 hours, and Mode 5 within 36 hours (exiting the applicability for functions addressed by CTS LCO 3.17.3). Since the completion time is shortened, this change is More Restrictive.	LCO 3.3.3 Required Actions E	Required Action 3.17.3.5
3.3.3 M.5	CTS Table 3.17.3 requires CHP setpoint to be between 4.4 and 3.7 psia. ITS Table 3.3.3-1 requires CHP setpoint to be between 4.3 and 3.7 psia. The ITS allowable band is narrower, therefore this change is More Restrictive.	Table 3.3.3-1	Table 3.17.3
3.3.4 Engineered Safety Features (ESF) Logic and Manual Initiation			
3.3.4 M.1	CTS 3.17.2.5 requires being in Hot Shutdown within 12 hours; and in a condition where the RPS is not required, within 48 hours, when the "number of Operable Channels" is less than the minimum required. ITS, in these conditions, requires entry into LCO 3.0.3. and to place the plant in Mode 3 within 7 hours; and in Mode 4 within 31 hours. This change will place the plant in a lower mode in a shorter time frame, and is more restrictive. This change is consistent with STS.	LCO 3.0.3	Required Action 3.17.2.5
3.3.4 M.2	CTS 3.17.2.5 requires being in Hot Shutdown within 12 hours and place the reactor in a condition where the affected equipment is not required, within 48 hours, when any Required Action is not completed and the associated completion time has expired. ITS 3.3.4 B.1 and B.2 require being in Mode 3 within 6 hours, and Mode 4 within 30 hours (exiting the applicability for functions addressed by CTS LCO 3.17.2). Since the completion time is shortened, this change is More Restrictive.	LCO 3.3.3 Required Actions B	Required Action 3.17.2.5
3.3.4 M.3	CTS 3.17.3.5 requires being in Hot Shutdown within 12 hours; and in a condition where the RPS is not required, within 48 hours, when the "number of Operable Channels" is less than the minimum required. ITS, in these conditions, requires entry into LCO 3.0.3. and to place the plant in Mode 3 within 7 hours; and in Mode 5 within 37 hours. This change will place the plant in a lower mode in a shorter time frame, and is more restrictive. This change is consistent with STS.	LCO 3.0.3	Required Action 3.17.3.5

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July 12, 1999DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.3.4 M.4	CTS 3.17.3.5 requires being in Hot Shutdown within 12 hours and place the reactor in a condition where the affected equipment is not required, within 48 hours, when any Required Action is not completed and the associated completion time has expired. ITS 3.3.3 C.1 and C.2 require being in Mode 3 within 6 hours, and Mode 5 within 36 hours (exiting the applicability for functions addressed by CTS LCO 3.17.3). Since the completion time is shortened, this change is More Restrictive.	LCO 3.3.3 Required Actions C	Required Action 3.17.3.5
3.3.5 Diesel Generator (DG) - Undervoltage Start (UV Start)			
3.3.5 M.1	A new ITS LCO, 3.3.5, "Diesel Generator (DG) - Undervoltage Start (UV Start)," has been added to ensure the plant is protected from a loss of voltage condition. There are no equivalent limits in the CTS. This change is more restrictive.	LCO 3.3.5	N/A
3.3.6 Refueling Containment High Radiation (CHR) Instrumentation			
3.3.6 M.1	CTS Table 4.17.6, Function 20, requires a refueling radiation monitor Channel Check each 24 hours. ITS SR 3.3.6.1 requires a Channel Check each 12 hours. This change is more restrictive. This change is consistent with STS.	SR 3.3.6.1	Table 4.17.6 Item 20
3.3.6 M.2	CTS LCOs 3.8 and 3.17.6 require two refueling containment radiation monitor channels to be Operable. ITS LCO 3.3.6 requires these channels and also requires two CHR manual actuation function channels. This change is more restrictive and is consistent with STS.	LCO 3.3.6	LCO 3.8 LCO 3.17.6
3.3.7 Post Accident Monitoring (PAM) Instrumentation			
3.3.7 M.1	CTS 3.17.4 provides an exception to Specification 3.0.3. ITS 3.3.7 does not include an exception to ITS LCO 3.0.3. This change is More Restrictive and is consistent with STS.	LCO 3.3.7	LCO 3.17.4
3.3.7 M.2	CTS 3.17.4 provides an exception to Specification 4.0.4. ITS does not include an exception to ITS SR 3.0.4. This change is More Restrictive and is consistent with STS.	LCO 3.3.7	LCO 3.17.4

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July 12, 1999DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.3.7 M.3	CTS 3.17.4.4 requires being in Hot Shutdown within 12 hours and place the reactor in a condition where the affected equipment is not required, within 48 hours, when any Required Action is not completed and the associated completion time has expired. ITS 3.3.7 F.1 and F.2 require being in Mode 3 within 6 hours, and Mode 4 within 30 hours (exiting the applicability for functions addressed by CTS LCO 3.17.4). Since the completion time is shortened, this change is More Restrictive.	LCO 3.3.7 Required Actions F	Required Action 3.17.4.4
3.3.8 Alternate Shutdown System			
3.3.8 M.1	CTS 3.17.5 provides an exception to Specification 3.0.3. ITS 3.3.8 does not include an exception to ITS LCO 3.0.3. This change is More Restrictive and is consistent with STS.	LCO 3.3.8	LCO 3.17.5
3.3.8 M.2	CTS 3.17.5 provides an exception to Specification 4.0.4. ITS 3.3.8 does not include an exception to ITS SR 3.0.4. This change is More Restrictive and is consistent with STS.	LCO 3.3.8	LCO 3.17.5
3.3.8 M.3	CTS 3.17.5.2 requires being in Hot Shutdown within 12 hours and place the reactor in a condition where the affected equipment is not required, within 48 hours, when any Required Action is not completed and the associated completion time has expired. ITS 3.3.8 B.1 and B.2 require being in Mode 3 within 6 hours, and Mode 4 within 30 hours (exiting the applicability for functions addressed by CTS LCO 3.17.5). Since the completion time is shortened, this change is More Restrictive.	LCO 3.3.8 Required Actions B	Required Action 3.17.5.2
3.3.10 Engineered Safeguards Room Ventilation (ESRV) Instrumentation			
3.3.10 M.1	CTS 3.17.3.5 requires being in Hot Shutdown within 12 hours; and in a condition where the RPS is not required, within 48 hours, when any Required Action is not completed and the associated completion time has expired. ITS 3.3.10, in these conditions, requires entry into LCO 3.0.3. and to place the plant in Mode 3 within 7 hours; and in Mode 5 within 37 hours. This change will place the plant in a lower mode in a shorter time frame, and is more restrictive. This change is consistent with STS.	LCO 3.0.3	Required Action 3.17.3.5

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.4 PRIMARY COOLANT SYSTEM (PCS) **3.4.1 PCS Pressure, Temperature, and Flow Departure from Nucleate Boiling (DNB) Limits**			
3.4.1 M.1	CTS 3.1.1f requires the nominal primary system operating pressure to be < 2100 psia. ITS 3.4.1 specifies this parameter as pressurizer pressure and limits the pressure from ≥ 2010 psia to ≤ 2100 psia. By specifying a pressure band, an additional restriction has been placed on the lower primary system pressure allowed during MODE 1. This is a more restrictive change, consistent with STS.	3.4.1a	3.1.1f
3.4.1 M.2	This change adds ITS SR 3.4.1.1 (pressurizer pressure) and SR 3.4.1.2 (reactor inlet temperature). The addition of these two new Surveillance Requirements results in a more restrictive change, consistent with STS.	SR 3.4.1.1 SR 3.4.1.2	N/A
3.4.1 M.3	CTS 4.15 specifies the requirement for primary system flow measurement and states that the measurement shall be made within the first 31 days of rated power operation. ITS SR 3.4.1.3 also requires a verification of the primary system flow rate and requires it must be verified within 24 hours after reaching or exceeding 90% Rated Thermal Power. This is a more restrictive change, consistent with STS.	SR 3.4.1.3	4.15
3.4.2 PCS Minimum Temperature for Criticality			
3.4.2 M.1	ITS 3.4.2 Condition A requires the plant to be in MODE 2 within 30 minutes with K_{eff} >1.0 if the PCS average temperature is less than 525° F. The CTS do not contain a specific action to address the condition when the reactor is critical and the primary coolant temperature is < 525° F; therefore, entry into CTS LCO 3.0.3 is required. The total time required to place the plant in a condition where the LCO does not apply when the primary coolant temperature is < 525° F and the reactor is critical is more restrictive in the ITS (7.5 hours) than in the CTS (13 hours). This is a more restrictive change, consistent with STS	3.4.2 Condition A	N/A
3.4.2 M2	This change adds ITS SR 3.4.2.1, which verifies T_{ave} is ≥ 525° F in each PCS loop every 12 hours. This change is an additional restriction on plant operations and is consistent with STS.	SR 3.4.2.1	N/A

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.4.3 PCS Pressure and Temperature (P/T) Limits		
3.4.3 M.1	CTS 3.1.2 Action a. contains the actions to be taken if the PCS pressure, PCS temperature, or PCS heatup and cooldown rates exceeded their limits. ITS 3.4.3 contains the same requirements modified by a Note which requires a determination of the PCS condition whenever the requirements of the LCO are not met. This is a more restrictive change.	LCO 3.4.3 Condition A	N/A
3.4.3 M.2	CTS 3.1.2 requires the plant to be in Cold Shutdown within 36 hours if the PCS is not determined to be acceptable for continued operation within the 72.5 hours after the PCS pressure, PCS temperature, or PCS heatup and cooldown rates have exceeded their limits. ITS 3.4.3 requires the same actions within the same time except it also requires, after MODE 5 is entered, that the PCS be determined acceptable for continued operation before entering MODE 4. This is a more restrictive change consistent with STS.	LCO 3.4.3 Condition C	N/A
3.4.3 M.3	ITS SR 3.4.3.1 requires verification that PCS pressure, PCS temperature and PCS heatup and cooldown rate are within their limits every 30 minutes. The CTS do not specify a frequency at which these parameters are monitored and recorded. This is a more restrictive change, consistent with STS.	SR 3.4.3.1	N/A
3.4.3 M.4	CTS 3.1.2 action b requires that if any action required by 3.1.2a is not met and the associated completion time has expired, the reactor shall be placed in Hot Shutdown within 12 hours, and in Cold Shutdown with PCS pressure less than 270 psia within 48 hours. ITS Condition B requires that if the Required Actions and associated Completion Times of Condition A are not met, the plant must be placed in MODE 3 within 6 hours, and in MODE 5 with PCS pressure less than 270 psia within 36 hours. This is a more restrictive change.	3.4.3 RA B.1 and B.2 Completion Times	3.1.2 Actions b.1 and b.2
	3.4.4 PCS Loops - MODES 1 and 2		
3.4.4 M.1	CTS 3.1.1b contains actions that allow short term continued power operation when less than four PCPs are in operation. ITS 3.4.4 does not provide an action which allows continued short term power operation less than four PCPs in MODES 1 or 2. This is a more restrictive change.	N/A	3.1.1b

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.4.4 M.2	ITS requires the plant to be placed in MODE 3 within 6 hours if both loops are not operable and in operation. CTS 3.1.1d specifies the requirement to have both stream generators Operable (i.e., capable of performing their heat transfer function), but does not provide actions when the requirement cannot be met. As such, the CTS would require entry into LCO 3.0.3 which allows one hour to initiate actions to place the plant in a condition in which the specification does not apply, and to be in Hot Standby within the next 6 hours. The Required Actions of the ITS to place the plant in MODE 3 within 6 hours are more restrictive than the actions of the CTS which allow 7 hours to achieve Hot Standby. This is a more restrictive change, consistent with STS.	3.4.4 Condition A	N/A
3.4.4 M.3	ITS SR 3.4.4.1 requires a verification that each PCS loop is in operation every 12 hours. The CTS do not require this verification. This is a more restrictive change, consistent with STS.	SR 3.4.4.1	N/A
3.4.5 PCS Loops - MODE 3			
3.4.5 M.1	CTS 3.1.1a requires at least one primary coolant pump in operation whenever a change is being made in the boron concentration when the plant is operating in Cold Shutdown or above. ITS 3.4.5 requires a primary coolant pump to be in operation any time the plant is in MODE 3. This is a more restrictive change.	LCO 3.4.5 Condition C	3.1.1a
3.4.5 M.2	CTS do not provide specific actions if both steam generators are not capable of performing their heat transfer function when the average temperature of the primary coolant is above 300°F. Therefore, the plant must apply the actions of CTS LCO 3.0.3. When the plant is in hot shutdown, CTS 3.0.3 allows one hour to initiate actions to place the plant in a condition in which the specification does not apply. ITS 3.4.5 Condition C requires, in part, immediate action to be initiated to restore one PCS loop to Operable status and operation. This is a more restrictive change, consistent with STS.	LCO 3.4.5 Condition C	N/A
3.4.5 M.3	ITS SR 3.4.5.1 requires a verification that the required PCS loop is in operation every 12 hours, SR 3.4.5.2 requires a verification that the secondary side water level in each SG is ≥ 84% every 12 hours, and SR 3.4.5.3 requires a verification that correct breaker alignment and indicated power are available to the required pump that is not in operation. Although the ability to ascertain the status of PCS loops and SGs is provided elsewhere in the CTS (e.g., Channel Checks for accident monitoring instruments) the CTS do not provide a requirement for direct verification of these operating. This is a more restrictive change.	SR 3.4.5.1 SR 3.4.5.2 SR 3.4.5.3	N/A

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.4.6 PCS Loops - MODE 4		
3.4.6 M.1	CTS 3.1.9.1 Exception 1 provides an allowance to suspend all flow through the reactor core for up to 1 hour provided certain restrictions are met. ITS 3.4.6 also contains this allowance (LCO Note 1) but restricts ITS use in any 8 hour period. This is a more restrictive change, consistent with STS.	3.4.6 Note 1	3.1.9.1 Exception 1
	3.4.7 PCS Loops - MODE 5, Loops Filled		
3.4.7 M.1	CTS 3.1.9.2 allows both SDC trains to be not in operation while in PCS temperature is <200° F and both loops are filled. ITS 3.4.7 Note 5 allows both SDC trains to be not operating in MODE 5 only while heating up to MODE 4. This is a more restrictive change, consistent with the STS.	LCO 3.4.7 Note 5	3.1.9.2
3.4.7 M.2	CTS 3.1.9.2 Exception 1 provides an allowance to suspend all flow through the reactor core for up to 1 hour provided certain restrictions are met. ITS 3.4.7 also contains this allowance (LCO Note 1) but restricts ITS use in any 8 hour period. This is a more restrictive change, consistent with the STS.	3.4.7 Note 1	3.1.9.2 Exception 1
	3.4.8 PCS Loops - MODE 5, Loops Not Filled		
3.4.8 M.2	The CTS do not include a surveillance to verify two of three charging pumps are incapable of reducing the boron concentration in the PCS. ITS 3.4.8 includes SR 3.4.8.3 which verifies that two of the three charging pumps are incapable of reducing the boron concentration in the PCS and is specified at a frequency of every 12 hours. This additional restriction on plant operations is a more restrictive change.	SR 3.4.8.3	N/A
	3.4.9 Pressurizer		
3.4.9 M.1	This change restates the CTS 3.1.1j requirement that the plant be placed in Hot Shutdown within 12 hours whenever the heater capacity from either bus falls below 375 kW and cannot be restored to an Operable status within 72 hours. For the same plant condition, ITS RA3.4.9 C.1 and C.2 require the plant to be placed in MODE 3 within 6 hours, and in MODE 4 within 30 hours. Since the intent of the actions is to place the plant in a safe condition when the requirements of the LCO cannot be met, the Required Actions of the ITS are more appropriate because they place the plant in a condition where pressurizer heaters are no longer required. This change is an additional restriction on plant operations and is consistent with STS.	3.4.9 Required Actions C.1 and C.2	3.1.1j

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.4.9 M.2	This change adds ITS LCO 3.4.9a and the accompanying note regarding pressurizer water level. Inclusion of this parameter is consistent with the assumptions used in the Palisades safety analyses because all analyses performed from a critical reactor condition assume the existence of a steam bubble and saturated conditions in the pressurizer. The inclusion of a maximum pressurizer water level in the ITS is more restrictive because it imposes an additional requirement to the technical specifications. This change is consistent with STS.	LCO 3.4.9a LCO 3.4.9a Note	N/A
3.4.9 M.3	This change adds the Required Actions and Completion Times associated with ITS 3.4.9 Condition A regarding the condition of pressurizer water level not being within limit. These Required Actions take the plant out of the applicable Modes for pressurizer operation. This change represents an additional restriction on plant operation and is consistent with STS.	3.4.9 Required Actions A.1, B.1 and associated Completion Times	N/A
3.4.9 M.4	This change restates the CTS 3.1.1j requirements to add a requirement that the pressurizer heater capacity must be capable of being powered from an emergency power supply, to form a foundation for ITS LCO 3.4.9c and 3.4.9 Condition B. The intent of this requirement is to ensure adequate redundant capacity is available to keep the primary coolant in a subcooled condition with natural circulation for an undefined period after a loss of offsite power. The requirement to specify that pressurizer heaters, which are not normally connected to emergency busses, are capable of being powered from an emergency power supply is consistent with STS.	LCO 3.4.9c 3.4.9 Condition B	3.1.1j
3.4.9 M.5	This change adds ITS SR 3.4.9.1, SR 3.4.9.2 and SR 3.4.9.3. Although the CTS requires a Channel Check of the wide range pressurizer level every 31 days as part of the accident monitoring instrumentation, SR 3.4.9.1 provides a concise requirement directly related to the LCO for the pressurizer. In addition, SR 3.4.9.1 includes a Note which provides a 1 hour delay period to perform the SR after establishing a bubble in the pressurizer and lowering the pressurizer water level to within ITS normal operating band. The pressurizer heater capacity test (SR 3.4.9.2) and emergency power test (SR 3.4.9.3) are not presently required by the CTS. This change is consistent with STS.	SR 3.4.9.1 SR 3.4.9.2 SR 3.4.9.3	N/A

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.4.10 Pressurizer Safety Valves		
3.4.10 M.1	This change restates the CTS 3.1.7.1 Action a completion time of 12 hours to the ITS 3.4.10 Required Action B.1 Completion Time of 6 hours. Six hours to place the plant in MODE 3 is reasonable, based on operating experience, to reach this plant condition without challenging plant systems. This change is an additional restriction on plant operations and is consistent with STS.	3.4.10 Required Action B.1 Completion Time	3.1.7.1 Action a
	3.4.11 Pressurizer Power Operated Relief Valves (PORVs)		
3.4.11 M.1	This change restates the CTS 3.1.8.1 Action c requirement "the reactor shall be placed in Hot Shutdown within 12 hours" to the ITS 3.4.11 Condition E requirement "the plant shall be placed in MODE 3 within 6 hours." The Required Actions of the ITS are more restrictive than the actions of the CTS because the ITS only allows 6 hours to reduce leakage versus the 12 hours allowed in the CTS. This is reasonable, based on operating experience, to reach MODE 3 from full power in an orderly manner and without challenging the safety system.	3.4.11 Condition E	3.1.8.1 Action c
	3.4.12 Low Temperature Overpressure Protection (LTOP) system		
3.4.12 M.1	This change adds ITS 3.4.12 RA A.1, to address the situation where one or two HPSI pumps are capable of injection. Condition A requires that actions be initiated immediately to verify no HPSI pumps are capable of injecting into the PCS. Although the proposed actions of the ITS are equivalent to the implied actions of the CTS, this change is more restrictive because the ITS imposes an explicit action versus an implied action in the CTS. This change is consistent with STS.	3.4.12 Required Action A.1	3.1.8.2
3.4.12 M.2	This change adds ITS 3.4.12 Condition D, to address the inoperability of the LTOP System for reasons other than inoperable PORVs or the ability to meet the Required Actions. This provides appropriate Required Actions when the requirements of the LCO cannot be met. To provide the appropriate actions for placing the plant in a safe condition, the ITS requires the PCS to be vented through a vent path capable of relieving the sudden pressure rise associated with an inadvertent mass or energy addition without violating the pressure limits determined by 10 CFR 50, Appendix G. This change is consistent with STS.	3.4.12 Condition D	3.1.8.2

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.4.13 PCS Operational LEAKAGE		
3.4.13 M.1	This change adds the LCO 3.4.13a requirement of "no pressure boundary leakage" in the PCS. To preclude any allowable leakage in unisolatable components, a new limit has been imposed on PCS operational leakage. Although the allowance for PCS pressure boundary leakage is precluded by the regulations set forth 10 CFR 50.55a, the inclusion of this requirement in the ITS is acceptable. This change is consistent with STS.	LCO 3.4.13a	3.1.5
3.4.13 M.2	This change restates the existing CTS 3.1.5 requirements regarding allowable action completion times and plant conditions (for other than pressure boundary leakage), to form a foundation for ITS 3.4.13 Condition A and B (portion), and the associated Required Actions and Completion times. The Required Actions of the ITS are more restrictive than the actions of the CTS because the CTS allows 6 hours to reduce leakage versus the 4 hours allowed in the ITS. In addition, the CTS allows 12 hours to be in Hot Shutdown versus the 10 hours allowed by the ITS to be in MODE 3. The Completion Times specified in the ITS to reduce leakage and to place the plant in MODE 3 are reasonable because they provide adequate time to confirm the leakage rate results, to classify the leakage as "identified" or "unidentified" and to place the plant in a condition that lessens the potential consequences associated with PCS leakage. This change is consistent with STS.	3.4.13 Conditions A and B	3.1.5a 3.1.5b
3.4.13 M.3	This change is made in conjunction with 3.4.13 M.2 to add the Required Actions 3.4.13 B.1 and B.2, pertaining to primary to secondary leakage in a steam generator. The overall actions of the ITS are more restrictive than the CTS because the CTS allows 7 hours to be in Hot Standby and 13 hours to be in Hot Shutdown, versus the 4 hours to restore the leakage to within limits and 6 hours to be in MODE 3 specified in the ITS. In addition, the CTS requires the plant to be placed in Cold Shutdown within 37 hours while the ITS requires the plant to be placed in MODE 5 within 36 hours. The Completion Times for primary to secondary leakage through a steam generator are consistent with the ITS Completion Times for identified and unidentified leakage.	3.4.13 Required Actions B.1 and B.2	3.1.5

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.4.14 PCS Pressure Isolation Valve (PIV) Leakage		
3.4.14 M.1	CTS 3.3.3 requires that PIVs be functional as a pressure isolation device "prior to returning to the Power Operation Condition." CTS 4.3h requires testing of the PIVs specified by CTS 3.3.3 "prior to returning to the Power Operation Condition." ITS 3.4.14 states the Mode of Applicability as "MODES 1, 2, and 3, and MODE 4, except during the SDC mode of operation, or during transition to or from the SDC mode of operation." The Applicability of the ITS is more restrictive than the CTS because it includes a broader spectrum of plant conditions. This change is consistent with STS.	3.4.14	3.3.3 4.3h
3.4.14 M.2	CTS 3.3.3b states that in the event integrity of any PIV can not be demonstrated, at least two valves in each high pressure line having a non-functional valve must be in and remain in, the mode corresponding to the isolated condition. In addition, CTS 3.3.3b contains footnote 1 which states that motor operated valves shall be placed in the closed position and power supplies de-energized. In ITS 3.4.14, if one or more flow paths with leakage from one or more PIVs is not within limits, Required Action A.1 requires the isolation of the high pressure portion of the system from the low pressure portion of the system by use of one closed deactivated automatic valve, or check valve, within 4 hours. In addition, ITS Required Action A.2 requires the restoration of a PIV with excessive leakage within 72 hours. The Required Actions of the ITS are more restrictive than the CTS because the ITS imposes explicit times for completing the isolation function of an inoperable PIV. This change is consistent with STS.	3.4.14 Condition A Required Actions A.1 & A.2	3.3.3b 3.3.3b footnote 1
3.4.14 M.3	CTS 3.3.3c specifies the shutdown actions when the requirements associated with PIV leakage limits cannot be met; requiring the reactor to be placed in hot shutdown within 12 hours. Under similar circumstances, ITS 3.4.14 RA B.1 requires the plant to be placed in MODE 3 within 6 hours. This change is more restrictive because the ITS requirement for placing the plant in MODE 3 is more restrictive than the CTS requirement to place the plant in hot shutdown (6 hours versus 12 hours). This change is consistent with STS.	3.4.14 Required Action B.1	3.3.3c
3.4.14 M.4	CTS 3.3.3b requirements include the isolation of a PIV with excessive leakage. ITS 3.4.14 RA A.1 also requires the isolation of a PIV with excessive leakage but stipulates (via a Note) that each valve used to satisfy the Required Action must have been verified to meet the leakage criteria of SR 3.4.14.1 and be on the PCS pressure boundary or high pressure portion of the system. This change is more restrictive because it requires that each valve used for isolation, be verified to meet the SR 3.4.14.1 leakage criteria, and the CTS does not require leakage criteria verification. This change is consistent with STS.	3.4.14 Required Action A.1 Note	3.3.3b

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.4.14 M.5	CTS 3.17.6.17 addresses the required actions for the condition of inoperable SDC suction valve interlock "channel(s)." Similarly, ITS 3.4.14 RA C.1 addresses this same condition; however, a completion time of 4 hours is specified. This is a more restrictive change because the ITS specifies a completion time, and the CTS does not. This change is consistent with STS.	3.4.14 Required Action C.1 Completion Time	3.17.6.17
3.4.14 M.6	CTS 3.17.6.21 provides shutdown actions if the requirements of CTS 3.17.6.17 (SDC suction valve interlock channels) cannot be met. ITS 3.4.14 does not contain equivalent actions and therefore, requires entry into LCO 3.0.3. This is a more restrictive change due to a decrease in the allowable completion times (12 hours - Hot Shutdown, 48 hours - equipment not required in CTS versus 7 hours - MODE 3, 31 hours - MODE 4 in ITS). This change is consistent with STS.	3.4.14	3.17.6.21
3.4.14 M.7	A new Surveillance Requirement (SR 3.4.14.2) has been added to ensure the SDC suction valve interlock is in the proper state when actual or simulated PCS pressure is≥ 280 psia. This change is more restrictive because, although similar to the CTS Table 4.17.6 Channel Functional Test, the actual value for the interlock function is stated in the new SR. This change is consistent with STS.	SR 3.4.14.2	N/A
3.4.14 M.8	CTS 4.3h requires leakage testing on specified PIVs when the plant has been placed in the Cold Shutdown Condition for more than 72 hours if it has not been accomplished within the previous 9 months. ITS SR 3.4.14.1 specifies a similar Frequency but also requires testing to be performed every 18 months. This is a more restrictive change because testing will be required every 18 months whether or not the plant is placed in Cold Shutdown. This change is consistent with STS.	SR 3.4.14.1 Frequency	4.3h
3.4.15 PCS Leakage Detection Instrumentation			
3.4.15 M.1	CTS Table 3.17.6 Item 7 specifies the minimum plant condition for the PCS leakage detection channels as "above 300° F T_{ave}." ITS LCO 3.4.15 Applicability includes MODE 4 (T_{ave} >200° F). This is a more restrictive change due to the lower applicable temperature range. This change is consistent with STS.	LCO 3.4.15 Applicability	Table 3.17.6 Item 7
3.4.15 M.2	CTS Table 3.17.6 footnote a states that (CTS) Specification 4.0.4 is not applicable, ITS 3.4.15 does not contain this statement. This is a more restrictive change because the ITS does not permit entry into MODE 4 unless the required surveillances for the Operable instrument channels have been performed. This change is consistent with STS.	LCO 3.4.15	Table 3.17.6 Footnote a

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.4.15 M.3	CTS 3.17.6.21 provides the shutdown actions if the leak detection requirements of CTS 3.17.6.1 or 3.17.6.2 cannot be met. ITS 3.4.15 Condition C requires entry into LCO 3.0.3 immediately if all channels are inoperable. This is a more restrictive change due to a decrease in the allowable Completion Times (12 hours - Hot Shutdown, 48 hours - equipment not required in CTS, versus 7 hours - MODE 3, 31 hours - MODE 4 in ITS). This change is consistent with STS.	3.4.15 Condition C	3.17.6.21
3.4.15 M.4	CTS 3.17.6.21 provides the shutdown actions if the leak detection requirements of CTS 3.17.6.1 or 3.17.6.2 cannot be met. ITS 3.4.15 Condition B contains the actions necessary when the Required Actions and associated Completion Times for inoperable leakage detection instruments cannot be met and limits the time to be in MODE 3 to 6 hours, and in MODE 5 to 36 hours. This is a more restrictive change due to a decrease in the allowable Completion Times (12 hours - Hot Shutdown, 48 hours - equipment not required in CTS, versus 6 hours - MODE 3, 36 hours - MODE 5 in ITS). This change is consistent with STS.	3.4.15 Condition B	3.17.6.21
3.4.16 PCS Specific Activity			
3.4.16 M.1	CTS 3.1.4b allows operation with PCS specific activity >1.0 but <40 µCi/gram for 72 hours. ITS 3.4.16 RA A.2 limits the time to 48 hours. This is a more restrictive change due to the decrease in allowable time to restore the dose equivalent to within limits. This change is consistent with STS.	3.4.16 Required Action A.2	3.1.4b 3.1.4c
3.4.16 M.2	CTS 4.2 Table 4.2.1 item 1, footnote (2) requires that the primary coolant sample obtained for the determination of E be taken "after at least 2 EFPD..." ITS SR 3.4.16.3 requires a sample within "31 days after a minimum of 2 EFPD..." This is a more restrictive change because of the added requirement that the sample be taken within 31 days after the specified plant conditions are met. This change is consistent with STS.	SR 3.4.16.3	Table 4.2.1 Item 1 footnote 2
3.4.16 M.3	CTS Table 4.2.1 requires an isotopic analysis for iodine, including I-131, I-133, and I-135 at frequencies of once per 4 hours, whenever dose equivalent I-131 exceeds 1.0 Ci/gram. ITS 3.4.16 requires that Dose Equivalent I-131 is within limits. This is a more restrictive change because the analysis required by the ITS is more comprehensive. This change is consistent with STS.	3.4.16 Required Action A.1	Table 4.2.1 Item 1

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.5 EMERGENCY CORE COOLING SYSTEM (ECCS) **3.5.1 Safety Injection Tanks (SITS)**		
3.5.1M.1	CTS 3.3.1 allows the reactor to be made critical for low temperature physics testing even though all the conditions associated with the SITs are not met. ITS 3.5.1 does not contain this same exception and, as such, always requires the SITs to be Operable prior to entering MODE 2. This change is an additional restriction on plant operations and is consistent with STS.	3.5.1 Applicability	3.3.1
3.5.1M.2	CTS 3.3.2 requires the reactor to be placed in hot shutdown within 12 hours when one SIT is not restored to Operable status within the allowed outage time. ITS LCO 3.5.1 Required Action C.1 requires the plant to be placed in MODE 3 within 6 hours when one SIT is not restored to Operable status within the allowed outage time. This change establishes consistency within the ITS for the time necessary to reach MODE 3. This change is an additional restriction on plant operations and is consistent STS.	3.5.1 Required Action C	3.3.2
3.5.1 M.3	CTS 4.6.4a specifies position verification of the SIT motor operated isolation valves and their associated breakers "within 7 days prior to each reactor startup." ITS SR 3.5.1.1 requires a verification of each SIT isolation valve position every 12 hours. ITS SR 3.5.1.5 requires a verification that power is removed from each SIT isolation valve every 31 days. ITS SR 3.0.1 states that failure to meet a surveillance shall be failure to meet the LCO. SR 3.0.4 states that entry into a Mode or other specified condition in the Applicability of an LCO shall not be made unless the LCO's surveillances have been met within their specified Frequency. As such, ITS SR 3.5.1.1 imposes additional restrictions relative to the frequency at which the SRs associated with the SIT motor operated isolation valves are performed. This change is consistent with STS.	SR 3.5.1.1 SR 3.5.1.5	4.6.4a
	3.5.2 ECCS - OPERATING		
3.5.2 M.1	CTS 3.3.1 establishes the Applicability for the various components which comprise the ECCS by stating that "the reactor shall not be made critical .... unless all of the following conditions are met." In ITS 3.5.2 this same statement would correspond to the "Applicability." In ITS 3.5.2, the Applicability of the ECCS is MODES 1 and 2, and MODE 3 with the PCS temperature ≥ 325°F. As such, the requirements associated with ITS 3.5.2 are more restrictive than CTS 3.3.1 by requiring the ECCS to be Operable during MODE 3 with the PCS temperature ≥ 325°F. This change is an additional restriction on plant operations.	3.5.2 Applicability	3.3.1

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.5.2 M.2	CTS 3.3.1 allows the reactor to be made critical for low power physics testing even though all the conditions associated with the ECCS are not met. ITS 3.5.2 does not contain this same exception and, as such, always requires the ECCS to be Operable prior to reaching a PCS temperature of 325°F in MODE 3. This change is an additional restriction on plant operations and is consistent with STS.	LCO 3.5.2	3.3.1
3.5.2 M.3	CTS 3.3.2 requires the reactor to be placed in hot shutdown within 12 hours when an ECCS train is not restored to Operable status within the allowed outage time. ITS 3.5.2 Required Action B.1 requires the plant to be placed in MODE 3 within 6 hours when an ECCS train is not restored to Operable status within the allowed outage time. This change establishes consistency within the ITS for the time necessary to reach MODE 3. This change is an additional restriction on plant operations and is consistent with STS.	3.5.2 Required Action B	3.3.2
3.5.2 M.4	In CTS 4.6.4c, the frequency specified for position verification of the safety injection recirculation path isolation valves and their switches is "within 7 days prior to each reactor startup." ITS SR 3.5.2.1 requires a verification that these same valves and their respective hand switches are in the open position every 12 hours. ITS SR 3.0.1 states that failure to meet a surveillance shall be failure to meet the LCO. ITS SR 3.0.4 states that entry into a Mode or other specified condition in the Applicability of an LCO shall not be made unless the LCO's surveillances have been met within their specified Frequency. As such, by specifying a SR Frequency of every 12 hours and applying the general rules of SR 3.0.1 and SR 3.0.4, the ITS imposes an additional restriction relative to the position verification of the safety injection recirculation path isolation valves. This change is consistent with STS.	SR 3.5.2.1	4.6.4c
3.5.2 M.5	In CTS 4.6.4b, the frequency specified for position verification of the Low-Pressure Safety Injection Flow Control Valve, CV-3006, and its associated air supply valve is "within 7 days prior to each reactor startup." ITS SR 3.5.2.3 requires a verification that this same valve is in the open position and that its associated air supply is isolated every 31 days. ITS SR 3.0.1 states that failure to meet a surveillance shall be failure to meet the LCO. ITS SR 3.0.4 states that entry into a Mode or other specified condition in the Applicability of an LCO shall not be made unless the LCO's surveillances have been met within their specified Frequency. As such, by specifying a SR Frequency of every 31 days and applying the general rules of ITS SR 3.0.1 and ITS SR 3.0.4, the ITS imposes an additional restriction relative to the position verification of the Low-Pressure Safety Injection Flow Control Valve and its associated air supply valve.	SR 3.5.2.3	4.6.4b

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.5.2 M.6	CTS 4.6.1a specifies the requirement to perform a system test of the safety injection system by initiating a test safety injection signal and verifying proper component actuation. CTS 4.6.1a permits the safety injection and shutdown cooling system pump motors to be de-energized during the test. ITS SR 3.5.2.6 verifies that each ECCS pump starts automatically on an actual or simulated actuation signal but does not allow the pump motors to be de-energized during the test. As such, the ECCS pumps must be started to satisfy the acceptance criteria of the test. This change is an additional restriction on plant operations and is consistent with STS.	SR 3.5.2.6	4.6.1a
3.5.2 M.7	Five new Surveillance Requirements demonstrate the Operability of the emergency core cooling system. They are: ITS SR 3.5.2.2 verifies the correct alignment for manual, power operated and automatic valves in the ECCS flow path every 31 days to assure a proper flow path exist for ECCS operation. ITS SR 3.5.2.5 demonstrates each automatic ECCS valve actuates to its required position on an actual or simulated Recirculation Actuation Signal (RAS) every 18 months. The CTS does not require this test for valves which get an RAS that do not get an SIS, since CTS 4.6.1a requires testing for SIS only. ITS SR 3.5.2.7 verifies that each LPSI pump stops on an actual or simulated RAS every 18 months. ITS SR 3.5.2.8 verifies the open limit switch on each of the four LPSI cold leg isolation valves and the two HPSI hot leg isolation valves is set to establish a predetermined flow which ensures that a single low pressure safety injection subsystem is capable of delivering the flow rate required in the safety analysis. This SR is performed every 18 months. ITS SR 3.5.2.9 requires the performance of a periodic inspection of the containment sump to ensure that it is unrestricted and stays in proper operating condition. This SR is performed every 18 months. The inclusion of these five SRs is an additional restriction on plant operations and is consistent with STS.	SR 3.5.2.2 SR 3.5.2.5 SR 3.5.2.7 SR 3.5.2.8 SR 3.5.2.9	4.6.1

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.5.3 ECCS - SHUTDOWN		
3.5.3 M.1	ITS 3.5.3, "ECCS-Shutdown," contains the Limiting Conditions for Operation, Applicability, Actions, and Surveillance Requirements to ensure the reactor is protected following various accidents by providing core cooling and negative reactivity addition, without consideration for a single failure, when the plant is in MODE 3 with PCS temperature < 325°F, and MODE 4. This specification is appropriate since the ECCS is part of the primary success path which functions to mitigate a Design Basis Accident or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. This change is consistent with STS.	3.5.3	N/A
	3.5.4 - REFUELING WATER STORAGE TANK		
3.5.4 M.1	CTS 3.3.1 establishes the Applicability for the various components which comprise the ECCS, including the SIRW Tank. In ITS 3.5.4 this would correspond to an "Applicability" of MODES 1 and 2. The Applicability of the SIRW Tank in the ITS 3.5.4 is MODES 1, 2, 3, and 4. However, the required minimum volume is reduced in MODE 4. During MODE 4, a portion of the SIRW Tank water volume is transferred to the PCS as makeup for shrinkage of the reactor coolant during the cooldown. However, since the PCS is at reduced temperature and pressure in MODE 4 the required SIRW Tank water volume can be reduced to 200,000 gallons. This change is an additional restriction on plant operations and is consistent with STS.	3.5.4 Applicability	3.3.1
3.5.4 M.2	CTS 3.3.1 allows the reactor to be made critical for low temperature physics testing even though all the conditions associated with the ECCS are not met. CTS 3.3.1 would allow the reactor to be made critical even though the parameters associated with the SIRW Tank (i.e., volume, boron concentration and temperature) were not in limit. ITS 3.5.4 does not contain this same exception and requires the SIRW Tank to be Operable prior to entering MODE 4. This change is an additional restriction on plant operations and is consistent with STS.	LCO 3.5.4	3.3.1
3.5.4 M.3	CTS 4.17, Table 4.17.5 item #12 specifies a Channel Check of the SIRW Tank level instrumentation. ITS SR 3.5.4.2 requires a verification that the SIRWT borated water volume is ≥ 250,000 gallons. The Channel Check requirement of CTS 4.17 encompasses the level verification requirement of ITS SR 3.5.4.2. The frequency associated with the Channel Check of CTS 4.17 is every 92 days. The frequency associated with the level verification of ITS SR 3.5.4.2 is every 7 days. As such, the requirement of ITS SR 3.5.4.2 is more restrictive than the requirement of CTS 4.17. This change is consistent with STS.	SR 3.5.4.2	4.17 Table 4.17.5 Item 12

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.5.5 - TRISODIUM PHOSPHATE		
3.5.5 M.1	CTS 3.19.2. requires the reactor to be placed in "Hot Shutdown within 12 hours," and "in a condition where the affected equipment is not required within 48 hours," if the actions of CTS 3.19.1 are not met. ITS 3.5.5 Condition B requires the plant to be placed in MODE 3 within 6 hours, and in MODE 4 within 30 hours, if the "Required Action and associated Completion Time" (of Condition A) "are not met." The ITS 3.5.5 Completion Times were chosen to establish consistency with similar type actions in the ITS.	3.5.5 Required Action B	3.19.2

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	SECTION 3.6.1, Containment		
3.6.1 M.1	CTS 3.0.3 requires the plant to be placed in Cold Shutdown within 37 hours if the acceptance criteria of CTS 4.5.4, CTS 4.5.5 and CTS 4.5.6 are not met since no explicit actions are stated. ITS 3.6.1 Required Actions A and B require the plant to be placed in Mode 5 within 36 hours if the acceptance criteria of SR 3.6.1.2 are not met. The addition of explicit actions in the ITS to address the failure to meet the containment structural integrity surveillances is more restrictive since it requires the plant to be placed in Mode 5 within 36 hours versus the 37 hours allowed in the CTS to reach Cold Shutdown.	3.6.1 Required Actions A and B	3.0.3 4.5.4 4.5.5 4.5.6
	SECTION 3.6.2, Containment Air Locks		
3.6.2 M.1	The CTS does not specify a surveillance for the air lock door interlock mechanism. ITS SR 3.6.2.2 does addresses the surveillance for the air lock interlock mechanism. This is a more restrictive change.	SR 3.6.2.2	4.5.2.c
3.6.2 M.2 OPEN	The CTS does not specify requirements for air locks other than the door seals must be within leakage limits and that at least one door in each air lock is properly closed and sealed. ITS 3.6.2 adds Condition C which addresses the cases where one or more containment air locks are inoperable for reasons other than leakage in one air lock door. These actions are equal to or more restrictive than any actions specified in the CTS. In particular, the requirement to restore the air lock to OPERABLE status within 24 hours is more restrictive than the CTS restoration times.	3.6.2 Required Action C	4.5.2
3.6.2 M.3	CTS 4.5.2c(3) allows both personnel air lock doors to exceed their specified leakage limit, or both emergency escape air lock doors to exceed their acceptance criterion for up to 7 days provided that leakage from one door does not cause the total containment leakage to exceed 0.60 La. In ITS 3.6.2, if both doors in an air lock are declared inoperable and overall containment leakage does not exceed 1.0 La, 24 hours are provided to return one door to an Operable status. The Actions of the ITS are more restrictive than the CTS since they limit the time that two air lock doors can be inoperable due to excessive leakage. This additional restriction is appropriate since it limits the duration two air lock doors can be inoperable to a reasonable time for restoring one door to Operable status.	3.6.2 Required Action C	4.5.2.c(3)
3.6.2 M.4	CTS 4.5.2c(3) requires repairs to restore the leak tightness of an air lock door seal be completed within 7 days or place the plant in cold shutdown. For the same inoperability, ITS 3.6.2 Condition A requires the Operable air lock door be: verified closed within 1 hour (RA A.1), locked closed within 24 hours (RA A.2), and verified lock closed once per 31 days (RA A.3). The addition of the ITS Required Actions (and related Note) is an additional restrictions on plant operations. This change is acceptable since it ensures the remaining Operable door fulfills the containment isolation function.	3.6.2 Required Action A	4.5.2c(3)

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	SECTION 3.6.3, Containment Isolation Valves		
3.6.3 M.2	CTS 4.5.3d specifies requirements for ensuring that all locked-closed manual containment isolation valves are closed and locked and specifies a frequency of prior to "the reactor going critical after a refueling outage.". ITS SR 3.6.3.2 and SR 3.6.3.3 addresses manual containment isolation valves and blind flanges for both outside and inside containment. The Frequency of SR 3.6.3.2 is every 31 days. The Frequency for SR 3.6.3.3 is "prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days. These changes are more restrictive since the CTS only requires the verification to be performed prior to going critical, does not require verification between refueling outages, and does not address blind flanges.	SR 3.6.3.2 SR 3.6.3.3	4.5.3d
3.6.3 M.4	The CTS does not require a periodic verification of isolated penetrations. ITS 3.6.3 Required Action A.2 requires isolated penetrations be verified every 31 days for devices outside containment and prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days for isolation devices inside containment. This verification is necessary to ensure the flow path with the inoperable valve remains isolated. Required Action A.2 is also modified by a Note which allows verification by administrative means." This allowance minimizes personnel exposure and recognizes that the probability of a valve misalignment is small.	3.6.3 Required Action A	3.6.1
	SECTION 3.6.4, Containment Pressure		
3.6.4 M.1	CTS 3.6.2 does not provide an explicit requirement to verify containment internal pressure is within limits. ITS SR 3.6.4.1 verifies containment pressure is within limits every 12 hours. This is a more restrictive change since the CTS does not contain an explicit verification of containment pressure on a periodic basis.	SR 3.6.4.1	3.6.2
	SECTION 3.6.5, Containment Air Temperature		
3.6.5 M.1	CTS 3.6.3 does not provide an explicit requirement to verify containment air temperature is within limits. ITS SR 3.6.5.1 verifies containment air temperature is within limits every 12 hours. This is a more restrictive change since the CTS does not contain an explicit verification of containment air temperature on a periodic basis.	SR 3.6.5.1	3.6.3

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	SECTION 3.6.6, Containment Cooling Systems		
3.6.6 M.1 (BYS)	CTS 3.4.1, CTS 3.4.2, and CTS 3.4.3 implicitly state an Applicability for the containment cooling systems as "During Power Operations." In ITS 3.6.6, the Applicability for this same system is Modes 1, 2, and 3. This change is more restrictive since the equipment is required to be Operable over a larger range of operating conditions. This change is encompassed by a Beyond Scope issue which is discussed in Section III, G of the SE.	3.6.6 Applicability	3.4.1 3.4.2 3.4.3
3.6.6 M.2	CTS 3.4.2 and 3.4.3 allow 12 hours to place the plant in Hot Shutdown if inoperable components are not restored to OPERABLE status. For the same condition, ITS 3.6.6 allows 6 hours to place the plant in MODE 3. This is a more restrictive change.	3.6.6 Required Action B	3.4.2 3.4.3
3.6.6 M.3	The CTS does not contain a requirement to verify the containment spray header is filled to the 735 ft elevation. ITS SR 3.6.6.3 verifies the containment spray header is filled to the 735 ft elevation every 31 days. This requirement ensure a rapid response time for containment spray for design basis event which requires containment spray.	SR 3.6.6.3	4.6.2
3.6.6 M.4	CTS 4.6.5b specifies that for the Containment Air Cooling System "Each fan and valve required to function during accident conditions will be exercised at intervals not to exceed three months." ITS SR 3.6.6.2 changes this interval to every 31 days for the fans. The change from every 3 months to 31 days is a more restrictive change.	SR 3.6.6.2	4.6.5b
3.6.6 M.5	The CTS does not require a periodic verification of containment spray valve position. ITS SR 3.6.6.1 requires that each containment spray manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in position be verified to be in the correct position every 31 days. This surveillance is added to give increased confidence that the valves are in their appropriate position. This is a more restrictive change.	SR 3.6.6.1	4.6.2
3.6.6 M.6	The CTS does not contain a requirement to verify service water flow to the CACs. ITS SR 3.6.6.4 verifies the total service water flow rate to CACs VHX-1, VHX-2, and VHX-3 is above a specified limit. This requirement ensures the CACs are receiving the necessary flow as specified in the safety analysis.	SR 3.6.6.4	4.6.5

TABLE M - MORE RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.6.6 M.7 (BYS)	CTS 3.4.2 and 3.4.3 allow a total of 84 hours to place the plant in Cold Shutdown if inoperable components are not restored to OPERABLE status. For the same condition, ITS 3.6.6 allows a total of 36 hours to place the plant in MODE 5. CTS 3.4.2 and 3.4.3 contain an additional 48 hours that is not contained in the ITS. This is a more restrictive change. This change is encompassed by a Beyond Scope issue which is discussed in Section III, G of this SE.	3.6.6 Required Action B	3.4.2 3.4.3
3.6.6 M.9	CTS 4.6.5.b requires that each containment cooler fan be exercised with no minimum operating time. ITS SR 3.6.6.2 requires the containment cooler fans be operated for ≥ 15 minutes every 31 days. The addition of a required duration to this surveillance requirement is a more restrictive change.	SR 3.6.6.2	4.6.5b
SECTION 3.6.7, Hydrogen Recombiners			
3.6.7 M.1	CTS 3.6.4 requires an inoperable hydrogen recombiner be restored to OPERABLE status within 30 days or be in at least "HOT SHUTDOWN within the next 12 hours." For the same inoperability, ITS 3.6.7 requires the plant be in MODE 3 within 6 hours. This is a more restrictive change since less time is provided to exit a condition where the recombiners are required.	3.6.7 Required Action B	3.6.4

TABLE M - MORE RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.7 PLANT SYSTEMS **3.7.1 Main Steam Safety Valves (MSSVs)**		
3.7.1 M.1	CTS 3.1.7.2a requires placing the plant in HOT SHUTDOWN within 12 hours if less than 23 MSSVs are OPERABLE. ITS 3.7.1.2 Required Action A.1 allows 4 hours to restore the required inoperable MSSVs to OPERABLE. Required Action B.1 requires the plant to be placed in MODE 3 within 6 hours. This is a more restrictive change, consistent with STS.	3.7.1.2 RA A.1	3.1.7.2a
3.7.1 M.2	CTS 3.1.7.2b requires placing the plant in COLD SHUTDOWN within 48 hours of entering the Action. ITS 3.7.1.2 Required Actions B.1 and B.2 will allow 30 hours to place the plant in MODE 4. This is a more restrictive change, consistent with STS.	3.7.1.2 RA B.1 RA B.2	3.1.7.2b
	3.7.3 Main Feedwater Regulating Valves (MFRVs) and MFRV Bypass Valves		
3.7.3 M.1	The CTS do not provide feedwater requirements to ensure the reactor is protected after High Energy Line breaks. ITS 3.7.3 provides Limiting Conditions for Operation, Applicability, and Actions to ensure the reactor is protected by providing isolation of the Main Feedwater System (MFWS) for High Energy Line Breaks (HELB) both inside and outside the containment. The addition of this new specification is appropriate since closing the MFRVs and bypass valves is part of the success path to mitigate the severity of a HELB. This is a more restrictive change, consistent with the STS.	3.7.3	N/A
3.7.3 M.2	CTS 4.2 Table 4.2.2 items 15a and 15b do not require the timing of the closure of the MFRVs and the associated bypass valves on Containment High Pressure (CHP) and Steam Generator Low Pressure (SGLP) signals. ITS SR 3.7.3.1 requires the MSRVs and associated bypass valves to close in $\leq$ 22 seconds to verify within the closure time assumed in the safety analysis. This is a more restrictive change, consistent with STS.	SR3.7.3.1	Table 4.2.2 Items 15a & 15b

TABLE M - MORE RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.7.4 Atmospheric Dump Valves (ADVs)		
3.7.4 M.1	The CTS do not provide requirements for the ADVs. ITS 3.7.4 provides Limiting Conditions for Operation, Applicability, Actions, and Surveillance Requirements for the ADVs to ensure a means to cool down the plant to Shutdown Cooling (SDC) System entry conditions when the main condenser is unavailable (e.g., during loss of offsite power). The addition of this new specification is appropriate, since cooldown of the Primary Coolant System is a primary success path for stabilization and recovery of the plant following a Design Basis Accident or Transient. This is a more restrictive change consistent with STS.	3.7.4	N/A
	3.7.5 Auxiliary Feedwater (AFW) System		
3.7.5 M.1	CTS 3.5.1, 3.5.2, and 3.5.3 require AFW to be OPERABLE and provide associated action statements at a primary temperature of 300°F. ITS 3.7.5 requires AFW to be Operable in MODES 1, 2, 3, and MODE 4 when a steam generator is being relied upon for decay heat removal. MODE 4 temperature requirements are greater than 200°F and less than 300°F. This is a more restrictive change, consistent with STS.	3.7.5	3.5.1 3.5.2 3.5.3
3.7.5 M.2	CTS 3.5.3 does not require a AFW train to be OPERABLE when the PCS is less than 300 F. ITS 3.7.5 requires one AFW train, which includes a motor driven pump, to be OPERABLE in MODE 4. This is a more restrictive change, consistent with STS.	3.7.5	3.5.3
3.7.5 M.3	CTS 3.5.3 requires the plant to be placed in Hot Standby within 6 hours and Hot Shutdown within following 6 hours for a total of 12 hours to Hot Shutdown. ITS 3.7.5 Required Action C.1 requires the plant to be placed in MODE 3 within 6 hours. ITS MODE 3 is equivalent to CTS HOT SHUTDOWN. This is a more restrictive change, consistent with STS.	3.7.5 RA C.1	3.5.3
3.7.5 M.4	CTS 3.5.2 provides completion times for restoration of an inoperable AFW component or train, which impose a time limitation based when the required AFW component or train became inoperable. ITS 3.7.5 Required Actions A.1 and B.1 provide a requirement for restoration of all AFW component/train to operable status within 10 days of the initial failure to meet the LCO requirement for AFW. This is more restrictive change, consistent with STS.	3.7.5 RA A.1 RA B.1	3.5.2

TABLE M - MORE RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.7.6 Condensate Storage and Supply		
3.7.6 M.1	The CTS do not have a requirement to verify the combined usable volume of the condensate storage tank and the primary makeup storage tank is ≥ 100,000 gallons. ITS SR 3.7.6.1, requires verification that the minimum combined usable volume of the condensate storage tank and primary makeup storage tank is ≥ 100,000 gallons. This is a more restrictive change, consistent with STS.	SR3.7.6.1	N/A
3.7.6 M.2	CTS 3.5.1, 3.5.2, and 3.5.3 Applicability is above 300°F for primary coolant temperature. The ITS 3.7.6 Applicability is MODES 1, 2, and 3, and MODE 4 when the steam generator is being relied upon for heat removal. In MODE 4 primary coolant temperature is ≤ 200°F which makes this specification applicable over a wider range of plant conditions. This change is acceptable because the equipment might be required to operate to mitigate an accident if the steam generators are being used for heat removal and therefore should be Operable during these conditions. This is a more restrictive change, consistent with STS.	3.7.6 Applicability	3.5.1 3.5.2 3.5.3
	3.7.7 Component Cooling Water (CCW) System		
3.7.7 M. 1	CTS 3.3.1, 3.3.2, 3.4.1, and 3.4.2 establish the Applicability for the various components which comprise the CCW as during power operation by stating that "the reactor shall not be made critical.... unless all of the following conditions are met." ITS 3.7.7 Applicability is MODES 1, 2, 3, and 4. This is a more restrictive change, consistent with STS.	3.7.7	3.3.1 3.3.2 3.4.1 3.4.2
3.7.7. M.2	CTS 3.3.1 and 3.4.1 contain an exception which allows the reactor to be made critical for low temperature physics testing even though all the conditions associated with the CCW are not met. ITS 3.7.7 does not contain this same exception and, as such, always requires the CCW to be Operable prior to reaching MODE 4. This is a more restrictive change, consistent with STS.	3.7.7	3.3.1 3.4.1
3.7.7 M.3	CTS 3.3.2 and 3.4.2 require the components listed in 3.3.1 and 3.4.1 be returned to Operable status within the specified completion time or be in Hot Shutdown within 12 hours. ITS 3.7.7 Required Action B.1 allows 6 hours to be in MODE 3. This is a more restrictive change, consistent with STS.	3.7.7 Required Action B.1	3.3.1 3.3.2 3.4.1 3.4.2

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.7.7 M.4	CTS 3.3.2, 3.4.2, and 3.4.3 specify that following the reactor being placed in Hot Shutdown due to an inoperability, and if operability is not restored within an additional 48 hours, the reactor shall be placed in a Cold Shutdown condition within 24 hours. . ITS 3.7.7, Condition B, specifies the shutdown requirements as discussed in other DOCS and does not include this intermediate the additional 48 hours completion time to restore an inoperable component. The Completion Time of ITS Required Action B.2 to be in MODE 5 in a total of 36 hours provides a reasonable time to restore an inoperable containment cooling train to Operable status. This is a more restrictive change, consistent with STS.	3.7.7	3.3.2 3.4.2 3.4.3
3.7.7 M.5	This change adds a new Surveillance Requirement to demonstrate the OPERABILITY of the Component Cooling Water System (CCW). SR 3.7.7.1 verifies the correct alignment for manual, power operated, and automatic valves in the CCW flow path every 31 days to assure a proper flow path exist for CCW operation. This is a more restrictive change and is consistent with STS.	SR 3.7.7.1	N/A
3.7.7 M.6	CTS 3.3.2d allows one CCW heat exchanger to be inoperable for 24 hours before action to shutdown the plant is required. ITS 3.7.7 does not allow this 24 hour time for restoration since it requires at least one CCW train to be operable and each train includes the two, common to both trains, CCW heat exchangers. This is a more restrictive change.	3.7.7	3.3.2d
3.7.7 M.7	CTS does not have specific Surveillances for CCW. Equivalent tests are performed as a part of other surveillances not explicitly specified for the CCW system. ITS SRs 3.7.7.2 and 3.7.7.3. specifically address CCW components. This is a more restrictive change, consistent with STS.	SR 3.7.7.2 SR3.7.7.3	N/A
	3.7.8 Service Water System (SWS)		
3.7.8 M.1	CTS 3.4.1, 3.4.2, and 3.4.3 establish criticality and power operation as the Applicability for the various components which comprise the SWS. ITS 3.7.8 Applicability is MODES 1, 2, 3, and 4. This is a more restrictive change, consistent with STS.	3.7.8	3.4.1 3.4.2 3.4.3
3.7.8 M.2	CTS 3.4.1 contains an exception which allows the reactor to be made critical for low temperature physics testing even though all the conditions associated with the SWS are not met. ITS 3.7.8 does not contain this same exception and requires the SWS to be OPERABLE prior to reaching MODE 4. This is a more restrictive change, consistent with STS.	3.7.8	3.4.1

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.7.8 M.3	The CTS do not contain a Surveillance Requirement to demonstrate the Operability of the Service Water System. A new Surveillance Requirement has been added to demonstrate the OPERABILITY of the Service Water System (SWS). SR 3.7.8.1 contains a Surveillance Requirement to verify the correct alignment for manual, power operated, and automatic valves in the SWS flow path every 31 days to assure a proper flow path exists for SWS operation. This is a more restrictive change, consistent with STS.	3.7.8	N/A
3.7.8 M.4	CTS 3.4.2 and 3.4.3 specify that following the reactor being placed in a Hot Shutdown condition due to an inoperability, that if the inoperability is not restored within an additional 48 hours, the reactor shall be placed in a Cold Shutdown condition within 24 hours. ITS 3.7.8 Condition B does not include the additional 48 hours before a further shutdown is required. The Completion Time of ITS Required Action B.2 to be in Mode 5 in a total of 36 hours provides a reasonable time to restore an inoperable containment cooling train to Operable status. This is a more restrictive change, consistent with STS.	3.7.8	3.4.2 3.4.3
3.7.8 M.5	CTS 3.4.2 requires the components listed in CTS 3.4.1 be returned to OPERABLE status within 7 days or be in HOT SHUTDOWN within 12 hours. ITS 3.7.8 Required Action B.1 allows only 6 hours to be in MODE 3. This is a more restrictive change, consistent with STS.	3.7.8 R.A. B.1	3.4.1 3.4.2
3.7.8 M.6	CTS does not have a specific surveillance for SWS automatic pump starts on a simulated or actual signal in the standby power available mode. ITS SR 3.7.8.3 is a specific surveillance for SWS automatic pump starts on a simulated or actual signal in the standby power available mode. This is a more restrictive change, consistent with STS.	SR 3.7.8.3	N/A
3.7.9 Ultimate Heat Sink (UHS)			
3.7.9 M.1	The CTS do not contain any requirements for the Ultimate Heat Sink (UHS). ITS 3.7.9 contains the Limiting Conditions for Operation, Applicability, Actions, and Surveillance Requirements to ensure that the UHS is available to supply adequate water to the Service Water System (SWS) for removal of the heat generated in the reactor during a Design Basis Accident (DBA) according to the assumptions in the Safety Analyses. The addition of this new specification is appropriate since the removal of the heat generated in the reactor is a primary success path which functions to mitigate the severity of a DBA. This is a more restrictive change consistent with STS.	3.7.9	N/A

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.7.10 Control Room Ventilation (CRV) Filtration		
3.7.10 M.1	CTS does not have a Surveillance that requires each train of heaters to be energized while the respective train of CRV Filtration is in operation. ITS SR 3.7.10.1 does require each train of heaters to be energized for at least 10 continuous hours while the respective train of CRV Filtration is in operation. This is a more restrictive change, consistent with STS.	SR 3.7.10.1	N/A
3.7.10 M.2	CTS 4.2, Table 4.2.3, item 2.b, requires CRV Filtration to maintain ≥1/8 inch positive pressure in the control room while in operation. ITS SR 3.7.10.4 has the same requirement plus a maximum flow rate while the pressure requirement is met. This is a more restrictive change, consistent with STS.	SR 3.7.10.4	Table 4.2.3 Item 2.b
	3.7.11 Control Room Ventilation (CRV) Cooling		
3.7.11 M.1	CTS does not have a specific Surveillance to verify each CRV cooling train has the capability to remove the assumed heat load. SR 3.7.11.1 requires that verification. This is a more restrictive change, consistent with STS.	3.7.11	N/A
	3.7.12 Fuel Handling Area Ventilation System		
3.7.12 M.1	The CTS 3.8.4 does not contain an explicit requirement to determine Fuel Handling Area Ventilation System Operability. ITS LCO 3.7.12 does contain a Condition, Required Action and Completion Time to address the time when the Fuel Handling Area Ventilation system is inoperable. This is a more restrictive change, consistent with STS.	3.7.12	3.8.4
3.7.12 M.2	CTS 3.8.4 requires Fuel Handling Area Ventilation System operation during three specified plant conditions. ITS 3.7.12 requires Fuel Handling Area Ventilation System in operation during the same three conditions plus when fuel is being handled in containment with the equipment door open and when a fuel cask is moved in or over the SFP. This is a more restrictive change.	3.7.12	3.8.4
3.7.12 M.3	CTS does not have a specific Surveillance for the Fuel Handling Area Ventilation System. ITS SR 3.7.12.3 requires additional testing to be performed on the Fuel Handling Area Ventilation System to verify Operability and that the Fuel Handling Area Ventilation System has not degraded and is operating at the flow rate assumed in the analysis. This is a more restrictive change.	SR 3.7.12.3	N/A

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.7.13 Engineered Safeguards Room Ventilation (ESRV) Dampers		
3.7.13 M.1	The CTS do not contain requirements for the Engineered Safeguards Room Ventilation (ESRV) Dampers. ITS 3.7.13 contains the Limiting Conditions for Operation, Applicability, Actions, and Surveillance Requirements to ensure the engineered safeguards pump room is isolated when required to reduce the offsite and onsite dose during a Maximum Hypothetical Accident (MHA). This is a more restrictive change, consistent with STS.	3.7.13	N/A
	3.7.14 Spent Fuel Pool (SFP) Water Level		
3.7.14 M.1	The CTS do not contain requirements for SFP water level. ITS 3.7.14 does contain requirements for SFP water level to ensure the effects of a fuel handling or cask drop accident is minimized. This is a more restrictive change, consistent with STS.	3.7.14	N/A
	3.7.15 Spent Fuel Pool (SFP) Boron Concentration		
3.7.15 M.1	CTS do not specify Applicability or Required Actions for SFP Boron Concentration being outside the minimum limit of 1720 ppm. ITS 3.7.15 does provide these requirements to ensure the effects of a misplaced or dropped fuel assembly is minimized. This is more restrictive change, consistent with STS.	3.7.15	N/A
	3.7.16 Spent Fuel Assembly Storage		
3.7.16 M.1	CTS do not contain LCOs, Applicability and Surveillance Requirements for spent fuel assembly storage. ITS 3.7.16 does contain the Limiting Conditions for Operation, Applicability, Actions, and Surveillance Requirements for spent fuel assembly storage. This is a more restrictive change, consistent with STS.	3.7.16	N/A

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.7.17 Secondary Specific Activity		
3.7.17 M.1	CTS 4.2 Table 4.2.1, item 7a, requires the specific activity of the secondary coolant system to be determined once per 31 days whenever the gross activity determination indicates iodine concentrations greater than 10% of the allowable limit, and once per 6 months whenever the gross activity determination indicates iodine concentrations below 10% of the allowable limit. ITS SR 3.7.17.1 will require the specific activity to be determined once per 31 days and does not contain the allowance to extend the SR interval to 6 months whenever the gross activity determination indicates iodine concentration below 10% of the allowable limit. This change is acceptable because the 31 day interval ensures that the specific activity is checked frequently enough to establish a trend to identify secondary activity problems in a timely manner. Deleting an allowance to extend an SR interval constitutes a more restrictive change. This is a more restrictive change, consistent with STS.	SR3.7.17.1	Table 4.2.1 Item 7a

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.8 ELECTRICAL POWER SYSTEMS **3.8.1 AC SOURCES - OPERATING**		
3.8.1 M.1	The proposed change to CTS 3.7.1.A.2 and B.4 revises the allowable time for restoration of an inoperable DG, to form a foundation for ITS 3.8.1 RA A.2 and B.4. The proposed change adds a requirement for restoration of all offsite circuits and DGs to operable status within10 days of initial failure to meet the ITS LCO requirement for 2 operable offsite circuits and 2 operable DGs. The added Completion Times assure that alternating inoperabilities in offsite circuits and DGs will not continue indefinitely without complete restoration to compliance with the LCO. This is consistent with the STS.	3.8.1 A.2 3.8.1 B.4	3.7.1 Action A.2 3.7.1 Action B.4
3.8.1 M.2	The proposed change to CTS 3.7.1.J revises the allowable shutdown times if inoperable components are not restored to OPERABLE status, to form a foundation for ITS 3.8.1 Condition F. The decrease in the allowable shutdown times results in a more restrictive change.	3.8.1 Condition F	3.7.1.J
3.8.1 M.3	CTS 4.7.1.3 is revised to add two notes and to form a foundation for ITS SR 3.8.1.3. One note (note 2) only allows the monthly testing to be performed on one DG at a time. The other note (note3) places a sequential requirement based on the successful performance of SR 3.8.1.2. These additional restrictions are conducive to the comprehensive testing of the DG start and load capabilities.	SR3.8.1.3	4.7.1.3
	3.8.3 DIESEL FUEL, LUBE OIL, AND STARTING AIR		
3.8.3 M.1	CTS 4.7.3.2 is revised to increase the stored lube oil inventory value from >=175 gallons to >=200 gallons and to form a foundation for ITS SR 3.8.3.2. The proposed change also revises CTS 3.7.3.B to alter the parameters of stored lube oil inventory from <175 and >=150 gallons to <200 and >160 gallons to form the foundation for ITS 3.8.3 Condition B. The quantity of stored lube oil in the ITS has been revised from the quantity required in the CTS as a result of data recently obtained related to diesel generator lube oil consumption. This is a "more restrictive" change and is acceptable because it continues to preserve the original basis for stored lube oil contained in the CTS.	SR3.8.3.2 3.8.3 Condition B	3.7.3.B 4.7.3.2
	3.8.4 DC SOURCES - OPERATING		
3.8.4 M.1	The proposed change revises CTS 3.7.4.C to decrease allowable shutdown times if inoperable components are not restored to OPERABLE status. The change forms a foundation for ITS 3.8.4 Condition D. The decrease in the allowable shutdown times results in a more restrictive change.	3.8.4 Condition D	3.7.4.C

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.8.7 INVERTERS - OPERATING		
3.8.7 M.1	The proposed change revises CTS 3.7.7.B to decrease the allowable shutdown times if inoperable components are not restored to OPERABLE status. The change forms a foundation for ITS 3.8.7 Condition and is consistent with the STS.	3.8.7 Condition B	3.7.7.B
	3.8.9 DISTRIBUTION SYSTEMS - OPERATING		
3.8.9 M.1	The proposed change revises CTS 3.7.9.D to decrease the allowable shutdown times if inoperable components are not restored to OPERABLE status. The change forms a foundation for ITS 3.8.9 Condition D. The decrease in the allowable shutdown times results in a more restrictive change.	3.8.9 Condition D	3.7.9.D
3.8.9 M.2	The proposed change revises CTS 3.7.9.A.2, B.2 and C.2 regarding the allowable time for restoration of an inoperable power distribution subsystem to form a foundation for ITS 3.8.9 RA A.1, B.1 and C.1. The proposed change adds a requirement for restoration of all subsystems to operable status within 16 hours of initial failure to meet the ITS LCO requirement. The added Completion Times assure that alternating inoperabilities in AC, DC and/or Preferred AC subsystems will not continue indefinitely without complete restoration to compliance with the LCO, and is consistent with the STS.	3.8.9 A.1 3.8.9 B.1 3.8.9 C.1	3.7.9.A.2 3.7.9.B.2 3.7.9.C.2

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.9.1 BORON CONCENTRATION		
3.9.1 M.1	CTS 3.8.1g established the requirement for minimum boron concentration "during reactor vessel head removal and while refueling operations are being performed in the reactor." The CTS defines "refueling operations" as "any operation involving movement of core components (except for incore detectors) when the reactor vessel head is untensioned or removed with fuel in the reactor vessel." In the ITS, the comparable requirement for boron concentration is met in ITS 3.9.1, "Boron Concentration." The Applicability of ITS 3.9.1 is more restrictive than CTS 3.8.1g because it is applicable for longer periods of time and t addresses the entire period the reactor vessel head is detensioned with fuel in the reactor vessel inclusive of reactor vessel head removal and refueling operations as defined, in the CTS.	3.9.1	3.8.1g
3.9.1 M.2	CTS 3.8.1g requires the Primary Coolant System be maintained at the "refueling boron concentration." Proposed ITS 3.9.1 requires the boron concentration of the primary coolant system and the refueling cavity be maintained at the "Refueling Boron Concentration" while in MODE 6. This change is consistent with the STS and is more restrictive because it requires refueling boron concentration for the entire time the PCS and refueling cavity are in MODE 6; not only when the head is being removed or only while refueling operations are being performed in the reactor. This change is acceptable because it conservatively envelopes the CTS requirement.	3.9.1	3.8.1g
3.9.1 M.3	CTS 4.2, Table 4.2.1 item 2 specifies that the boron concentration of the reactor coolant (primary coolant system) be tested "twice per week." Therefore, the requirement of the CTS is met if the reactor coolant is tested every 84 hours whenever the reactor vessel head is removed and fuel is contained in the reactor vessel. (Note: the sampling frequency during reactor vessel head removal and refueling operations is addressed by CTS 3.8.1g.) In ITS 3.9.1 for this same plant condition (i.e., MODE 6), the boron concentration of the primary coolant system and the refueling cavity must be verified to be within limit every 72 hours. This change is more restrictive because it decreases the testing frequency. It is acceptable because it conservatively envelopes the CTS requirement.	3.9.1	3.8.1g 4.2.1 (Table Item 2)

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	3.9.3 CONTAINMENT PENETRATIONS		
3.9.3 M.1	CTS 3.6.1b states that containment integrity shall not be violated when the reactor vessel head is removed (unless the PCS boron concentration is at the Refueling Boron Concentration). Unlike the requirements of the CTS, the ITS does not permit the option to maintain containment integrity in lieu of establishing the required boron concentration while the reactor vessel head is removed. This change is an additional restriction on plant operations and is consistent with the STS. This more restrictive change is acceptable because the option to maintain containment integrity in lieu of maintaining refueling boron concentration is not necessary for safe operation.	3.9.3	3.6.1b
3.9.3 M.2	A new SR has been adopted to address containment penetrations during Core Alterations and movement of irradiated fuel assemblies within containment. Proposed SR 3.9.3.1 requires a verification that each required containment penetration is in the required position and is verified on a Frequency of every 7 days. Since the CTS do not contain this requirement, this change is an additional restriction on plant operations.	SR 3.9.3.1	N/A
	3.9.4 SHUTDOWN COOLING (SDC) AND COOLANT CIRCULATION - HIGH WATER LEVEL		
3.9.4 M.1	CTS 3.1.9.3 Exceptions 1 and 2 provide allowances to suspend all SDC flow through the reactor core (exception 1) and to render the required SDC trains inoperable for testing or maintenance (exception 2). ITS 3.9.4 contains these allowances (LCO Note 1 and 2) but restricts their use in any 8 hour period. This change is conservative and maintains consistency with the STS.	3.9.4	3.1.9.3 Exceptions 1 & 2
3.9.4 M.2	A new Required Action has been added to CTS 3.1.9.3 and CTS 3.8.2 to address the condition when the requirements for a SDC train are not met. The proposed change to ITS 3.9.4 requires all containment penetrations providing direct access from the containment atmosphere to the outside atmosphere be closed within four hours.	3.9.4	3.1.9.3 3.8.2
	3.9.5 SHUTDOWN COOLING (SDC) AND COOLANT CIRCULATION - LOW WATER LEVEL		
3.9.5 M.1	A new Required Action has been added to CTS 3.1.9.3 and CTS 3.8.2 to address the condition when no SDC trains are Operable or in operation. The proposed change to ITS 3.9.5 requires all containment penetration providing direct access from the containment atmosphere to the outside atmosphere be closed within 4 hours.	3.9.5	3.1.9.3 3.8.2

TABLE M - MORE RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
3.9.5 M.2	CTS 3.1.9.3 contains an exception for SDC train operability when there is fuel in the reactor with PCS temperature <200 F and the PCS loops are not filled. In ITS 3.9.5 Shutdown Cooling (SDC) and Coolant Circulation - Low Water Level, the allowance to stop all SDC flow is not permitted because there is no assurance that an adequate mass of water is available to provide the necessary decay heat sink when the refueling cavity is <647 ft elevation. As such, the deletion of this allowance in the ITS is more restrictive than currently allowed in the CTS.	3.9.5	3.1.9.3
3.9.6 REFUELING CAVITY WATER LEVEL			
3.9.6 M.1	ITS 3.9.6, "Refueling Cavity Water Level" is a new specification which contains the Limiting Condition for Operation, Applicability, Actions and Surveillance Requirement to ensure a minimum water level is maintained in the refueling cavity during Core Alterations and the movement of irradiated fuel assemblies. The addition of this new specification is appropriate because the minimum refueling cavity water level is an operating restriction that is an initial condition of a design basis event (Fuel Handling Accident Inside Containment) that assumes the failure of a fission product barrier. ITS 3.9.6 is consistent with the STS.	3.9.6	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
	5.0 ADMINISTRATIVE CONTROLS		
5.0 M.1	The proposed change adds a requirement to ITS 5.4.1b, that "The emergency operating procedures required to implement the requirements of NUREG-0737 and to NUREG-0737, Supplement 1, as stated in Generic Letter 82-33." This requirement was not included in the CTS; therefore, this is a more restrictive change.	5.4.1b	N/A
5.0 M.2	The CTS 6.5.3, "Post Accident Sampling Program," term"radioactive iodines" is revised in ITS 5.5.3, to "radioactive gases." The use of the term "gases" is broader than "iodines" for the sampling and analyzing requirement. Therefore, this is considered a more restrictive change.	5.5.3	6.5.3
5.0 M.3	The "Containment Structural Integrity Surveillance Program" is added as ITS 5.5.5. The CTS Sections 4.5.4, 4.5.5 and 4.5.6 contain requirements regarding tendon testing and dome delamination. However, a comprehensive program regarding these, and other components is contained in the ISTS. This is a more restrictive change because the program addresses structural components other than tendons, which is consistent with the STS. Refer also to change 5.0 LA.1	5.5.5	6.5.5
5.0 M.4	The proposed change adds the "Safety Functions Determination Program" as ITS 5.5.13. This program works in conjunction with the ITS in identifying any loss of safety function which might exist. The CTS did not contain this program, and its implementation requires additional evaluations to identify a loss of safety function than what is required in the CTS. This change is considered a more restrictive change.	5.5.13	6.5.13
5.0 M.5	This change revises CTS 6.6.7 requirements that a report be submitted, when required, within 30 days. The revision requires that the report be submitted within 14 days in ITS 5.6.6. The change imposes an additional restriction on plant operations because the time period allowed to submit the report has been shortened. This change establishes consistency with the STS and is deemed acceptable because it only involves a change to administrative requirements and does not alter the way in which the plant is operated.	5.6.6	6.6.6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
	3.1 REACTIVITY CONTROL SYSTEMS **3.1.4 CONTROL ROD ALIGNMENT**			
3.1.4 l.1	CTS Table 3.17.6, Item 2 requires rod position indication to be operable whenever more than one CRDM is capable of rod withdrawal. ITS 3.1.4 only requires indication in MODES 1 and 2. This is proper because in the ITS (3.3) below MODE 2, the Reactor Protective System (RPS) provides protection against inadvertent rod withdrawal. Since the rod position indication requirements are relaxed, this is a less restrictive change.	3.1.4	Table 3.17.6, Item 2	2
3.1.4 L.2	CTS 4.17.6, Item 2 requires verification of Regulating Rod Withdrawal and Shutdown Rod Insertion interlocks OPERABILITY. These interlocks are used as an operator aid and do not meet the 10 CFR 50.36(c)(2)(ii) criteria for retention in technical specifications. LCO 3.1.5 is sufficient to ensure that the regulating withdrawal and shutdown rod insertion restrictions are maintained. Elimination of the "operator aid" requirement to verify interlock OPERABILITY makes this change less restrictive.	SR3.1.4.1 SR3.1.4.2 SR3.1.4.5	Table 4.17.6, Item 2	3
3.1.6 L.1	CTS Table 3.17.6, Item 13, Rod Group Sequence Control/Alarm, and Item 18, Power Dependent Insertion (PDIL) Alarm shows that each alarm circuit has two channels and requires that a minimum of one of the two channels for each alarm must be OPERABLE or, as required by CTS 3.17.21a, the reactor be in Hot Shutdown within 12 hours. In ITS 3.1.6 ACTION C, the Control Rod Out-Of-Sequence (CROOS) alarm circuit and the PDIL alarm circuit are allowed to be inoperable (ITS 3.1.6 ACTION C) if each regulating rod group position is verified, within 15 minutes after any rod motion, to be within its withdrawal, sequence, overlap, and insertion limits (ITS SR 3.1.6.1). This is a less restrictive change since if the CROOS alarm and PDIL alarm were inoperable, ITS 3.1.6 ACTION C provides an alternative action. If ITS 3.1.6.1 was not met, ITS 3.1.6 ACTION D would require the reactor to be in MODE 3 within 6 hours (ITS MODE 3 and CTS Hot Shutdown are equivalent).	LCO 3.1.6	3.17.6.13 3.17.6.18 3.17.6.21 Table 3.17.6	3

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
3. Relaxation of Required Actions
4. Relaxation of Allowed Outage Time
5. Deletion of SR
6. Relaxation of Surveillance Requirement Acceptance Criteria
7. Relaxation of Surveillance Frequency
8. Deletion of Requirement for 30-day Special Report to NRC

TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
3.1.6 L.2	CTS Table 3.17.6, Item 13 requires the Rod Group Sequence Control/Alarm to be operable when more than one CRDM is capable of rod withdrawal. ITS 3.1.6 which includes the Control Rod Out of Sequence (CROOS) alarm circuit is applicable only in MODES 1 and 2. The CROOS alarm circuit provides indication of when the regulating rod groups are being withdrawn out of sequence. This is a less restrictive change because the CROOS alarm will not be required OPERABLE except in MODES 1 and 2. This change is appropriate because the requirements of ITS Section 3.3, Instrumentation, will require that the Reactor Protection System (RPS) be OPERABLE when more than one rod is capable of withdrawal and will ensure that the safety analysis assumptions for control rod group/bank withdrawal are maintained. This change is consistent with the STS for the requirements for regulating rod sequence Applicability.	LCO 3.1.6	Table 3.17.6, Item 13	2
	3.1.7 SPECIAL TEST EXCEPTIONS (STE)			
3.1.7 L.1	CTS 3.10.7 provides the equivalent of Special Test Exceptions (STE) and allows deviations from 6 other CTS Sections during low power physics testing. ITS 3.1.7 permits suspension of the requirements of four other ITS Sections during performance of PHYSICS TESTS. Six operating limitations, common to both CTS and ITS are changed. The CTS have no required ACTIONS, whereas the ITS have four; the CTS have Surveillance Requirements (SRs), whereas the ITS have three. While there are more restrictive and administrative aspects to this change, overall the change isconservatively classified as less restrictive. The less restrictive limitations involve the Primary Coolant System (PCS) maximum and minimum temperatures which remain limited by the Thermal Margin/Low Pressure Reactor Trip, and the PCS pressure which remains limited by the High Pressurizer Pressure Trip. Overall classification of this change as Less Restrictive is acceptable and the change is appropriate because those limitations changed by the ITS are otherwise controlled by other limitations and operation within the ITS limitations is ensured by the ITS added SRs and ACTIONS.	3.1.7	3.10.7 3.10.1a 3.10.1b 3.10.3 3.10.4b 3.10.5 3.10.6	Various

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
3. Relaxation of Required Actions
4. Relaxation of Allowed Outage Time
5. Deletion of SR
6. Relaxation of Surveillance Requirement Acceptance Criteria
7. Relaxation of Surveillance Frequency
8. Deletion of Requirement for 30-day Special Report to NRC

TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
	3.2 POWER DISTRIBUTION LIMITS			
	3.2.1 LINEAR HEAT RATE			
3.2.1 L.1	The 15 minute Completion Time to initiate corrective action in CTS 3.23.1 Action 1 has been replaced by the ITS Required Action 3.2.1A.1 Completion Time of one hour to restore the LHS to within limits. The ITS one hour Completion Time to restore the LHR to within limits allows the operator enough time to determine corrective action and is sufficient to assure prompt action is taken to prevent the plant from operating outside of limits for an extended period. This change is less restrictive and is consistent with the STS.	3.2.1A.1	3.23.1 Action 1	3
3.2.1 L.2	The CTS 3.23.1 default action when the LHR is not within limits at the end of the allowed time is to place the plant in a condition outside the Applicability for the LHR limits (less than 50% of Rated Power) within the following 2 hours. The similar ITS 3.2.1 Required Action C.1 Completion Time is 4 hours. This is a less restrictive change. It is appropriate because the ITS default action is to reduce Thermal Power to less than or equal to 25% RTP. The additional time is necessary to reduce the power the additional amount in an orderly manner without challenging plant systems and remains more restrictive than the time recommended by the STS.	3.2.1C.1	3.23.1 Action 1	4
3.2.1 L.3	CTS 4.19.1.2d requires, when using the excore monitoring system to monitor LHR, that the measured AO be verified continuously. ITS SR 3.2.1.5 reflects this Surveillance Requirement except that the Frequency is changed to one hour. Because this parameter does not change significantly in a short period of time unless some type of outside impetus is applied, and other indications in the control room would provide notification of such an outside impetus, a one hour Frequency is adequate. This change is Less Restrictive and is appropriate because the frequency remains more restrictive than that required for monitoring of ASI by the STS.	SR3.2.1.5	4.19.1.2d	7

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
3. Relaxation of Required Actions
4. Relaxation of Allowed Outage Time
5. Deletion of SR
6. Relaxation of Surveillance Requirement Acceptance Criteria
7. Relaxation of Surveillance Frequency
8. Deletion of Requirement for 30-day Special Report to NRC

TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
3.2.1 L.4	CTS 4.19.1.1 requires the incore alarms to be set, based on a measured power distribution, every seven days of power operation. ITS 3.2.1.2 requires adjusting the incore alarm setpoints every 31 EFPD. The ITS Frequency, stated in EFPD, for setting the incore alarms, based on a measured power distribution, is appropriate because the measured power distribution is directly related to burnup and is consistent with The STS. This less restrictive change of the Frequency from seven days to 31 EFPD is acceptable because the power distribution changes only slightly with the amount of fuel burnup and a 31 EFPD frequency is sufficient to detect instrument drift caused changes in the setpoints.	SR3.2.1.2	4.19.1.1	7

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
3. Relaxation of Required Actions
4. Relaxation of Allowed Outage Time
5. Deletion of SR
6. Relaxation of Surveillance Requirement Acceptance Criteria
7. Relaxation of Surveillance Frequency
8. Deletion of Requirement for 30-day Special Report to NRC

TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
	3.2.2 RADIAL PEAKING FACTORS			
3.2.2 L.1	CTS 3.23.2 provides actions for when peaking factors exceeding their limits based on power level. With power less than 50%, CTS 3.23.2 requires the plant to be in at least Hot Shutdown (subcritical) within 6 hours. ITS 3.2.2 Required Action A.1 provides 6 hours to attempt restoration of the peaking factors to within limits; and, if the Required Action A.1 and its associated Completion Time is not met, then Required Action B.1 requires that Thermal Power be reduced to ≤ 25% RTP. This change is less restrictive in two ways. First, the six hours is provided in ITS 3.2.2 Condition A to attempt restoration of the peaking factors to within limits that is not provided in the CTS. Second, the ITS Condition B default action requires only that the plant to be reduced to ≤ 25% RTP in the subsequent 4 hours. These less restrictive changes are appropriate. First, because although CTS 3.23.2 requires the plant to be placed in hot shutdown, terminating the power reduction anywhere below 25% (as allowed by the ITS) is permissible under CTS rules (CTS 3.23.2 is Applicable above 25% power). Therefore, the default action of proposed ITS 3.2.2 Required Action B.1 is consistent with the shutdown action for CTS 3.23.2. Second, a Completion Time of 4 hours is reasonable to reduce thermal power below 25% in an orderly manner and without challenging plant systems	3.2.2	3.23.2	3

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
3. Relaxation of Required Actions
4. Relaxation of Allowed Outage Time
5. Deletion of SR
6. Relaxation of Surveillance Requirement Acceptance Criteria
7. Relaxation of Surveillance Frequency
8. Deletion of Requirement for 30-day Special Report to NRC

TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
3.2.2 L.2	CTS 4.19.2.1b requires the Radial Peaking Factors (RPF) to be verified within limits on a Frequency of once per week of power operation. The periodic Frequency of ITS SR 3.2.2.1 is every 31 EFPD. A Frequency of 31 EFPD is acceptable because the RPF are directly related to burnup and the power distribution changes only slightly with the amount of fuel burnup.	SR3.2.2.1	4.19.2.1b	4
3.2.3 RADIAL PEAKING FACTORS				
3.2.3 L.1	The CTS 3.23.3, ACTION 3, requires that with T_q > 15%, the plant be in Hot Standby conditions (i.e., subcritical) within 12 hours. ITS 3.2.3, Required Action C.1 requires that, with T_q > 15%, the plant Thermal Power be reduced to ≤ 25% within 4 hours. Because ITS Required Action C allows the plant to remain in power operation, this change is less restrictive. This is acceptable because the ITS Required Action C is consistent with both ITS 3.2.3 Applicability and the STS.	3.2.3 Required Action C.1	3.23.3 Action 3	3
3.2.4 AXIAL SHAPE INDEX				
3.2.4 L.1	CTS 3.1.1e (1) requires initiation of corrective action within 15 minutes to restore the ASI to the acceptable region. The ITS 3.2.4 less restrictive omission of that requirement to begin restoration activity allows the operator sufficient time to evaluate core conditions to determine appropriate corrective actions before initiating such actions. The remaining time of the four hour ITS 3.2.4 Condition B Completion Time to restore the ASI to within limits is sufficient to assure prompt action is taken and prevent the plant from operating in this condition for an extended period.	3.2.4 Condition B	3.1.1e (1)	4

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
3. Relaxation of Required Actions
4. Relaxation of Allowed Outage Time
5. Deletion of SR
6. Relaxation of Surveillance Requirement Acceptance Criteria
7. Relaxation of Surveillance Frequency
8. Deletion of Requirement for 30-day Special Report to NRC

TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
3.2.4 L.2	CTS 3.1.1e (1) provides a one hour Completion Time to restore the ASI to within limits when the ASI is not within limits and an additional two hours to reduce power to an acceptable level if the ASI has not been restored to within limits. ITS 3.2.4 Required Action A provides a Completion Time of 2 hours for restoration to within limits and Required Action B provides an additional four hours to reduce power to a level where this LCO is not applicable. This limits the time the plant is operated outside the initial conditions assumed in the accident analyses and it is sufficiently short to prevent the xenon distribution in the core from changing significantly and is an acceptable amount of time, based on operating experience, to reduce Thermal Power to ≤ 25% RTP in an orderly manner without challenging plant systems. These Less restrictive Completion Time changes are consistent with the STS.	3.2.4	3.1.1	4

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
3. Relaxation of Required Actions
4. Relaxation of Allowed Outage Time
5. Deletion of SR
6. Relaxation of Surveillance Requirement Acceptance Criteria
7. Relaxation of Surveillance Frequency
8. Deletion of Requirement for 30-day Special Report to NRC

TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
	3.3 INSTRUMENTATION **3.3.1 Reactor Protective System (RPS) Instrumentation**			
3.3.1 L.1	ITS 3.3.1, Condition B (2 RPS channels inoperable) excludes the applicability of LCO 3.0.4; CTS 3.17.1 does not contain this exclusion. In this condition, the RPS is in a one-out-of-two logic. Since the probability of failure of both Operable channels during the Completion Time is remote, this change is acceptable. This change is consistent with STS.	LCO 3.3.1 Cond. B Note	3.17.1	3
3.3.1 L.2	CTS Table 4.17.1 requires Channel Functional Tests on RPS channels each 31 days. Its SR 3.3.1.5 requires these tests each 92 days. Justification for extending the interval is provided in CE Topical Report CEN-327-A. Consumers Energy has determined that drift over the extended interval will not cause the setpoint to exceed it's Allowable Value. This change is consistent with STS.	SR 3.3.1.5	Table 4.17.1	7
3.3.1 L.3	CTS Table 4.17.1, Footnote (c), requires that the excore channels be calibrated with a test signal every 31 days. ITS SR 3.3.1.6 requires the surveillance to be performed every 92 days. This together with other specified surveillance are sufficient to ensure the power range channels areoperable. This change is consistent with STS.	SR 3.3.1.6	Table 4.17.1	7
3.3.1 L.4	CTS Table 4.17.1 requires calibration of the VHPT when power is > 15% RTP. ITS SR 3.3.1.3 will add a Note allowing this SR to be delayed until 12 hours after power is >15% RTP. This will provide more accurate results, and provide assurance that the RPS Functions will actuate at the required setpoints. The 12 hour is short enough that the likelihood of an event occurring which requires a VHPT trip is small. Additionally for the most part channel tests confirm operability rather than identify channel inoperability. This change is consistent with STS..	SR 3.3.1.3	Table 4.17.1	7

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
3. Relaxation of Required Actions
4. Relaxation of Allowed Outage Time
5. Deletion of SR
6. Relaxation of Surveillance Requirement Acceptance Criteria
7. Relaxation of Sruveillance Frequency
8. Deletion of requirement for 30-day Special report to NRC

TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
3.3.1 L.5	CTS 4.18.2.1b requires calibration of the excore system every 31 days. In ITS, SR 3.3.1.4 not required to be performed until 12 hours after power is ≥ 25% RTP. The 12 hour interval is acceptable because after outages, other than refueling outages, the former calibration would still be valid; after a refueling outage, post-refueling testing would uncover any unacceptable disparity. This change is consistent with STS.	SR 3.3.1.4	4.18.2.1b	7
3.3.2 Reactor Protective System (RPS) Logic and Trip Initiation				
3.3.2 L.1	CTS Table 4.17.1 requires Channel Functional Tests RPS Matrix Logic and Initiation Logic channels each 31 days. Its SR 3.3.2.1 requires these tests each 92 days. Justification for extending the interval is provided in CE Topical Report CEN-327-A. Consumers Energy has determined that drift over the extended interval will not cause the setpoint to exceed it's Allowable Value. This change is consistent with STS.	SR 3.3.2.1	Table 4.17.1	7
3.3.3 Engineered Safety Features (ESF) Instrumentation				
3.3.3 L.1	ITS 3.3.3, Condition B (2 ESF channels inoperable) excludes the applicability of LCO 3.0.4; the Actions of CTS 3.17.2 and 3.17.3 do not contain this exclusion. In this condition, the ESF is in a one-out-of-two logic. Since the probability of failure of both Operable channels during the Completion Time is remote, this change is acceptable. This change is consistent with STS.	LCO 3.3.3 Cond. B Note	3.17.2 3.17.3	3
3.3.3 L.2	CTS Tables 4.17.2 and 4.17.3 require Channel Functional Tests on ESF Instrument channels each 31 days. Its SR 3.3.3.2 requires these tests each 92 days. Justification for extending the interval is provided in CE Topical Report CEN-327-A. Consumers Energy has determined that drift over the extended interval will not cause the setpoint to exceed it's Allowable Value. This change is consistent with STS.	SR 3.3.3.2	4.17.2 4.17.3	7

Categories:
1. Relaxation of LCO
2. Relaxation of Applicability
3. Relaxation of Required Actions
4. Relaxation of Allowed Outage Time
5. Deletion of SR
6. Relaxation of Surveillance Requirement Acceptance Criteria
7. Relaxation of Surveillance Frequency
8. Deletion of Requirement for 30-day Special Report to NRC

TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
3.3.3 L.3	CTS 3.17.3 requires the SGLP channels to Be Operable "when the PCS is above Cold Shutdown." The ITS 3.3.3 Applicability for the SGLP Function is MODES 1, 2, and 3 with MODES 2 and 3 except when all MSIVs are closed and de-activated, and all MFIVs are closed and de-activated, or are isolated by closed manual valves. This makes the automatic isolation function Applicability consistent with the Applicability of the components actuated by the instrumentation Function. This change is consistent with STS.	LCO 3.3.3 Applicability	LCO 3.17.3 Applicability	2
3.3.4 Engineered Safety Features (ESF) Logic and Manual Initiation				
3.3.4 L.1	CTS 3.17.3 requires the SGLP channels to Be Operable "when the PCS is above Cold Shutdown." The ITS 3.3.4 Applicability for the SGLP Function is MODES 1, 2, and 3 with MODES 2 and 3 except when all MSIVs are closed and de-activated, and all MFIVs are closed and de-activated, or are isolated by closed manual valves. This makes the automatic isolation function Applicability consistent with the Applicability of the components actuated by the instrumentation Function.	LCO 3.3.4 Applicability	LCO 3.17.3 Applicability	2
3.3.6 Refueling Containment High Radiation (CHR) Instrumentation				
3.3.6 L.1	CTS 3.8.1c requirement to verify the Refueling containment system radiation monitors to be Operable "immediately prior to refueling operations" has been deleted. ITS provides SRs 3.3.6.1, 3.3.6.2, and 3.3.6.3 to assure radiation monitor operability. ITS 3.3.6 and SR 3.0.4 require the Operability of each radiation monitor prior to entering the MODE of Applicability. These surveillances are consistent with testing for ESF instrumentation. This change is consistent with STS.	LCO 3.3.6	SR 3.8.1c	7

Categories:
1. Relaxation of LCO
2. Relaxation of Applicability
3. Relaxation of Required Actions
4. Relaxation of Allowed Outage Time
5. Deletion of SR
6. Relaxation of Surveillance Requirement Acceptance Criteria
7. Relaxation of Surveillance Frequency
8. Deletion of Requirement for 30-day Special Report to NRC

TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
3.3.6 L.2	If CTS 3.8.1 is not met, CTS 3.8.2 requires that refueling operations be terminated immediately. ITS LCO 3.3.6 Required Actions require, when one required channel is inoperable, that the inoperable channel be placed in trip or the plant be removed from the applicable conditions of the LCO. The completion time has been extended from immediately to 4 hours. The ITS retains sufficient requirements in to support the reduction of dose consequences following a fuel handling accident. Therefore, this change is acceptable. This change is consistent with STS.	3.3.6 Required Actions A.1, A.2.1, and A.2.2	Required Action 3.8.2	3
3.3.7 Post Accident Monitoring (PAM) Instrumentation				
3.3.7 L.1	CTS 3.17.4 Actions 1a, 3a, and 5a allow 7 days for restoration of an inoperable PAM channel. ITS LCO 3.3.7 Action A.1 allows 30 days for this restoration. The longer ITS completion times are based on the additional industry operating experience available when the STS were written, the passive nature of the instruments, and the low probability of an event during this interval. This change is consistent with STS.	LCO 3.3.7 Required Action A.1	LCO 3.17.4 Required Actions 1a, 3a, and 5a	4
3.3.7 L.2	CTS 3.17.4 Action 2a allows 2 days for restoration for one of two inoperable channels of Hydrogen Monitoring. ITS LCO 3.3.7 Action D.1 allows 3 days for this restoration The longer ITS completion times are based on the additional operating experience available when the STS were written, the passive nature of the instruments, the accessibility of these instruments, and the low probability of an event during this interval. This change is consistent with STS.	LCO 3.3.7 Required Action D.1	LCO 3.17.4 Required Action 2a	4
3.3.7 L.3	CTS 3.17.4 Actions 2a and 6a allow 2 days for restoration for one of two inoperable channels of functions other than Hydrogen Monitoring. ITS LCO 3.3.7 Action C.1 allows 7 days for this restoration The longer ITS completion times are based on the additional operating experience available when the STS were written, the passive nature of the instruments, and the low probability of an event during this interval. This change is consistent with STS.	LCO 3.3.7 Required Action C.1	LCO 3.17.4 Required Actions 2a and 6a	4

Categories:
1. Relaxation of LCO
2. Relaxation of Applicability
3. Relaxation of Required Actions
4. Relaxation of Allowed Outage Time
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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
3.3.7 L.4	CTS 3.17.4 Actions 4a and 4b require a plant shutdown if a single inoperable channel for one or more functions cannot be restored to operable status (for Functions other than Reactor Vessel Water Level and Containment Area Radiation Monitoring). ITS 5.6.6 requires reporting preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation. These controls assure that the appropriate margin of safety is maintained. This is acceptable because the low probability of this instrumentation being needed, and because alternative actions are identified before a loss of monitoring capability occurs. This change is consistent with STS.	LCO 3.3.7 Required Action B.1	LCO 3.17.4 Required Actions 4a and 4b	4
3.3.7 L.5	CTS 3.17.4.7b requirement that alternate monitoring be initiated within 48 hours with two Reactor Vessel Water Level channels inoperable is deleted. The instrumentation which is used as an alternative to RVWL channels is also required by CTS 3.17.4 and ITS 3.3.7. ITS 5.6.6 requires reporting preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation. These controls assure that the appropriate margin of safety is maintained. This change is consistent with STS.	LCO 3.3.7	LCO 3.17.4 Required Action 7b	3
3.3.7 L.6	CTS 3.17.4.7d requirement that the inoperable channels for functions 16 through 21 be restored to Operable status prior to startup from the next refueling is deleted. ITS 3.3.7 Action G.1 requires the NRC be informed of the schedule for restoration. This requirement will ensure sufficient monitoring capability exists for post accident management and that the inoperable channel(s) are restored in a timely manner. This change is consistent with STS.	LCO 3.3.7	LCO 3.17.4 Required Action 7d	3
3.3.7 L.7	CTS 3.17.4.3 allows continued operation with inoperable CIV position indication if the associated valves are locked closed. ITS Table 3.3.7-1 Note (a) also provides this allowance but also allows other options. This change is acceptable because these options require penetration isolation. This change is consistent with STS.	Table 3.3.7-1 Note (a)	Required Action 3.17.4.3	3

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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
3.3.7 L8	TS Table 4.17.4 provides CHANNEL CHECK for post accident monitors each 31 days. STS SR 3.3.7.1 requires the CHANNEL CHECK only for the channels normally energized. These circuits cannot be tested during normal plant conditions without energizing and transfering control to a location outside the control room. The revised testing is acceptable based on industry experience that demonstrates channel failure is rare. This change is consistent with the STS.	SR 3.3.7.1	Table 3.17.4	7
	3.3.8 Alternate Shutdown System			
3.3.8 L.1	CTS Table 4.17.5 requires a quarterly Channel Check for the Alternate Shutdown instrumentation. ITS deletes this requirement. This change is acceptable since it eliminates transferring to the Alternate Shutdown System which removes the control power from the control room during plant operation. The Channel Calibration provides the necessary confirmation of channel Operability. This change is consistent with STS.	LCO 3.3.8	Table 4.17.5	6
3.3.8 L.2	CTS 3.17.5.1 requires provision of equivalent capability within 7 days , and restoration within 60 days, when one Alternate Shutdown channel is inoperable. ITS 3.3.8 Action A.1 requires restoration within 30 days. This action's Completion Time is acceptable because the equipment is not required to perform any immediate, or automatic, safety function and the low probability of an event requiring this equipment during the interval. This change is consistent with STS.	LCO 3.3.8 Required Action A.1	3.17.5 Required Action 1	3

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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CAT.
	3.4 PRIMARY COOLANT SYSTEM (PCS) **3.4.1 PCS Pressure, Temperature, and Flow Departure from Nucleate Boiling (DNB) Limits**			
3.4.1 L.1	The proposed change adds Required Actions A.1 and B.1 to ITS 3.4.1. Actions are not provided in the CTS if reactor vessel flow or primary system pressure are not within the specified limits. In the CTS, if the PCS pressure, temperature and flow are not within limits, the plant must enter CTS 3.0.3, which allows 1 hour to initiate actions to place the plant in a condition in which the specification does not apply, and 6 hours to be in at least Hot Standby. ITS 3.4.1 Required Action A.1 is less restrictive than the action of the CTS because the ITS allows 2 hours to restore the out-of-limit parameter versus the 1 hour allowed by CTS 3.0.3. The 2 hour Completion Time in the ITS provides sufficient time to determine the cause of the off normal condition and adjust plant parameters to restore the variable.	3.4.1 Required Actions A.1 and B.1	N/A	3
3.4.1 L.2	ITS 3.4.1 Required Action A.1 allows 2 hours to restore the reactor inlet temperature if it exceeds the limit. CTS 3.1.1g (1) allows 0.5 hours to restore the out-of-limit parameter. The 2 hour Completion Time stipulated in the ITS provides sufficient time to determine the cause of the off normal condition and adjust plant parameters to restore the out-of-limit temperature without initiating a premature plant shutdown.	3.4.1 Required Action A.1	3.1.1g (1)	3
3.4.1 L.3	As discussed in DOCs A.2, A.3, and A.4, CTS 3.1.1 does not contain an explicit mode of applicability for primary system flow rate, pressure (pressurizer pressure), or reactor inlet temperature. In the CTS, the Mode of Applicability for these requirements is during "Power Operations." In the ITS 3.4.1, the Applicability is MODE 1 and results in a less restrictive change because it excludes plant operations between 2% and 5% RTP. Adequate protection is provided to ensure that DNBR criteria will continue to be met between 2% and 5% RTP because the parameters associated with ITS 3.4.1 are required to be maintained within limits in the event of an unplanned transient, and via RPS instrumentation parameters.	3.4.1	3.1.1c 3.1.1f 3.1.1g	2

Categories:

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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CAT.
	3.4.5 PCS Loops - MODE 3			
3.4.5 L.1	CTS 3.1.1d does not provide specific actions if one steam generator becomes inoperable. Therefore, the plant must be placed (CTS 3.03) in cold shutdown within 25 hours. ITS Condition A allows 72 hours to restore the plant to operable status, and condition B allows 24 hours to be in MODE 4. This less restrictive change is acceptable because the loss of one required PCS loop is only a loss in redundancy.	3.4.5 Required Action A.1 & B.1	3.1.1d	4
3.4.5 L.2	CTS 3.1.1a allows boron concentration increases in an emergency loss of coolant flow situation. ITS 3.4.5 allows all primary coolant pumps to be stopped for ≤ 1 hour and does not preclude an increase in the PCS boron concentration during this period. This less restrictive change is acceptable because the addition of soluble boron to the PCS anytime the reactor is in MODE 3, regardless of PCS pump operation, will offset the presence of core reactivity and provide an increase in the margin of safety.	LCO 3.4.5 Note 1	3.1.1a	1
	3.4.6 PCS Loops - MODE 4			
3.4.6 L.1	CTS 3.1.9.1 Action 1.b, requires maintaining PCS temperature as low as practical with available equipment. ITS 3.4.6 does not require this action. Because a loss of one means of heat removal only results in a loss of redundancy, this is an acceptable less restrictive change.	3.4.6	3.1.9.1 Action 1.b	3
3.4.6 L.2	CTS 3.1.1 allows a boron concentration increases in an emergency loss of coolant flow situation. ITS 3.4.6 allows all primary coolant pumps to be stopped for ≤ 1 hour and does not preclude an increase in the PCS boron concentration during this period. This change is acceptable because the addition of soluble boron to the PCS anytime the reactor is in MODE 4, regardless of PCS pump operation, will offset the presence of core reactivity and provide an increase in the margin of safety. This is an acceptable less restrictive change.	LCO 3.4.6 Note 1	3.1.1a	1

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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CAT.
3.4.6 L.3	With one SDC train available in MODE 4, CTS 3.1.9.1 requires that corrective actions be initiated immediately to return a second loop or train to operable status and the PCS temperature be < 200 °F within 24 hours. For the same status (MODE 4, one SDC train available), ITS 3.4.6 Condition B requires the plant to be placed in MODE 5 within 24 hours and does not require corrective actions to be initiated immediately to return a second loop to operable status. This is a less restrictive change.	3.4.6 Required Action B.1	3.1.9.1 Action 1.a	3
3.4.6 L.4	CTS 3.10.1c provides actions when the recirculation flow rate of the PCS is less than 2810 gpm that includes restrictions on charging pump operation. ITS 3.4.6 provides appropriate required actions when the required 2810 gpm is not met and does not restrict charging pump operation. This is a less restrictive change which is acceptable because ITS 3.1.1 requires shutdown margin to be $\geq$ 3.5% $\Delta\rho$ in MODES 4 and 5.	3.4.6	3.10.1c	3
3.4.7 PCS Loops - MODE 5, Loops Filled				
3.4.7 L.1	CTS 3.1.9.2 Exception 1 allows all flow through the reactor core to be stopped provided two SDC trains are Operable. ITS 3.4.7 contains an allowance to stop all flow but does not stipulate that both SDC trains have to be Operable because the redundant heat removal function is being provided by the required SGs. This is acceptable because even though the SGs cannot produce steam in MODE 5 (i.e., the temperature is below 212 °F), they are capable of being a heat sink during natural circulation due to their large contained volume of secondary side water. This a less restrictive change consistent with the STS.	N/A	3.1.9.2 Exception 1.c	1

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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CAT.
3.4.7 L.2	CTS 3.1.9.2 Action 1.b states that with fewer Operable means of decay heat removal than required "...maintain PCS temperature as low as practical with available equipment." In ITS 3.4.7, this same action is not stipulated because a loss of one means of heat removal (SGs or SDC train) only results in a loss of redundancy and any one remaining loop or train is capable of performing the decay heat removal function. This is a less restrictive change.	N/A	3.1.9.2 Action 1.b	1
3.4.7 L.3	CTS 3.1.9.2 Exception 1 allows all flow through the reactor core to be stopped provided no operations are permitted that would cause a reduction in the PCS inventory. ITS 3.4.7 contains an allowance to stop all flow but does not contain a prohibition on operations which result in a reduction in PCS inventory. This is acceptable because a reduction in PCS inventory within the bounds of the Applicable mode (i.e., PCS loops filled) will not impact the ability of the PCS to perform the decay heat removal function. This is a less restrictive change.	LCO 3.4.7 Note 1.a	3.1.9.2 Exception 1.a	1
3.4.7 L.4	CTS 3.1.1a stipulates the requirement for having forced circulation in the PCS whenever a change is made in the PCS boron concentration. ITS LCO 3.4.7 contains a Note which allows all primary coolant pumps and shutdown cooling pumps to be stopped for $\leq$ 1 hour per 8 hour period and does not preclude an increase in the PCS boron concentration during this time. This is a less restrictive change that is acceptable because the addition of soluble boron to the PCS anytime the reactor is in MODE 5, regardless of PCS pump operation, will offset the presence of core reactivity and provide an increase in the margin of safety.	LCO 3.4.7 Note 1	3.11a	1
3.4.7 L.5	CTS 3.10.1c provides actions when the recirculation flow rate of the PCS is less than 2810 gpm that includes restrictions on charging pump operation. ITS 3.4.7 provides appropriate Required Actions when the required 2810 gpm is not met and does not restrict charging pump operation. This is a less restrictive change which is acceptable because ITS 3.1.1 requires the shutdown margin to be $\geq$ 3.5% $\Delta\rho$ in MODES 4 and 5.	LCO 3.4.7	3.10c	3

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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CAT.
	3.4.8 PCS Loops - MODE 5, Loops Not Filled			
3.4.8 L.1	CTS 3.1.1a requires maintaining SDC flow ≥ 2810 gpm whenever changes in PCS boron concentration are being made. ITS 3.4.8 does not impose any specific flow rate restriction for an increase in the PCS boron concentration, but does impose flow restrictions to protect against an inadvertent boron dilution. This less restrictive change is acceptable because the basis of the CTS flow requirement is to protect against boron dilution.	3.4.8	3.1.1a	1
3.4.8 L.2	CTS 3.1.9.3 " Shutdown Cooling" requires a minimum SDC flow rate of 1000 gpm which is based on operating experience. CTS 3.10.1c "Control Rod and Power Distribution Limits" which is based on analysis supporting the born dilution event, establishes a condition where a minimum flow of < 650 gpm is allowed. ITS 3.4.8 allows a minimum flow of ≥ 650 gpm. This less restrictive change is acceptable because the 650 gpm flow determined by analysis ensures sufficient time to terminate a boron dilution event.	3.4.8	3.1.9.3 3.10.1c	1
3.4.8 L.3	CTS 3.1.9.3 Action 1.b states that with fewer Operable means of decay heat removal than required, "...maintain PCS temperature as low as practical with available equipment." In ITS 3.4.8, this same action is not stipulated because a loss of one SDC train only results in a loss of redundancy and the one remaining SDC train is capable of performing the decay heat removal function. Because a change in Modes is precluded, this is less restrictive change, consistent with the STS, is acceptable because an increase in temperature above 200 °F would cause a change in Modes that is not allowed while in the Required Actions of ITS 3.4.8.	3.4.8	3.1.9.3 Action 1.b	1

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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CAT.
3.4.8 L.4	CTS 3.1.9.3 does not allow one SDC train to be inoperable for two hours for testing while the plant is in the equivalent of MODE 5. ITS 3.4.8, Note 2, allows one SDC train to be inoperable for testing for up to 2 hours for surveillance testing provided the other SDC train is Operable and in operation. This is a less restrictive change, consistent with the STS, which is acceptable because a single Operable SDC train in operation is adequate to provide the required cooling and mixing functions of the PCS.	3.4.8 Note 2	3.1.9.3	1
3.4.8 L.5	CTS 3.10.1c contains certain restrictions on charging pump operations when the PCS flow is < 2810 gpm and ≥ 650 gpm. ITS 3.4.8 does not include these restrictions. This less restrictive change is acceptable because the sections of ITS Section 3.4, considered in total, provide appropriate requirements to address all operations involving a reduction in PCS boron concentration.	3.4.8	3.10.1c	3
3.4.10 Pressurizer Safety Valves				
3.4.10 L.1	The proposed change reflects the correlation of the CTS 3.1.7.1 Applicability of "above cold shutdown" to the ITS 3.4.10 Applicability of "...MODES 1 and 2, MODE 3 with all PCS cold leg temperatures ≥ 430 °F...." The ITS does not require the pressurizer safety valves to be Operable when any PCS cold leg temperatures are below 430 °F as required by the CTS. When any PCS cold leg temperatures are < 430 °F, overpressure protection of the PCS is provided by the components required by ITS 3.4.12, "Low Temperature Overpressure Protection." Because the LTOP specification provides PCS overpressure protection by other means, the pressurizer safety valves are not required to provide overpressure protection of the PCS when any PCS cold leg temperatures are < 430 °F.	3.4.10 Applicability	3.1.7.1 Applicability	2

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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CAT.
3.4.10 L.2	The proposed change restates CTS 3.1.7.1 Action b to form a foundation for ITS 3.4.10 Required Action B.2. The CTS requires the plant to be placed in Cold Shutdown while the ITS only requires the plant to be placed in MODE 3 with all PCS cold leg temperatures < 430 °F; this results in a less restrictive change. As discussed in change 3.4.10 L.1, the Applicability for pressurizer safety valves has been revised to exclude those plant conditions when any PCS cold leg temperatures are ≤ 430 °F. Therefore, with one or more pressurizer safety valves inoperable it is only necessary to require the plant to be placed in a condition where the pressurizer safety valves are no longer required to perform the overpressure protection function for the PCS.	3.4.10 Required Action B.2	3.1.7.1 Action b	3
3.4.10 L.3	The proposed change restates the CTS 4.2 Table 4.2.2 item 3 test frequency of "one each refueling," to form a foundation for ITS SR 3.4.10.1 Frequency of "In accordance with the Inservice Testing Program." The frequency for testing the pressurizer safety valves stipulated in the ITS is less restrictive than the frequency required by the CTS. This frequency is acceptable because it is based on industry experience which has shown that this testing interval is sufficient to maintain the status of the pressurizer safety valves such that they are capable of performing their intended safety function and assure continued safe operation of the plant.	SR 3.4.10 Frequency	4.2 Table 4.2.2 Item 3	7
3.4.11 Pressurizer Power Operated Relief Valves (PORVs)				
3.4.11 L.1	The proposed change adds the ITS 3.4.11 Actions Note 2 to the CTS 3.1.8.1 Actions, which provides an exemption to the requirements of LCO 3.0.4. The exemption for LCO 3.0.4 permits entry into MODE 3 with all PCS cold leg temperatures ≥ 430 °F to permit cycling of the PORVs. This change is acceptable because below 430 °F, the PORVs are required to be Operable to support LTOP requirements and thus, provide reasonable assurance that the PORVs will be Operable above 430 °F until confirmation is achieved by completing the stroke test.	3.4.11 Actions Note 2	3.1.8.1 Actions	3

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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CAT.
	3.4.12 Low Temperature Overpressure Protection (LTOP) System			
3.4.12 L.1	The proposed change adds a note to the CTS 4.1 (4)a requirement, which allows a delay in the performance of the test until 12 hours after decreasing PCS cold leg temperature to < 430 °F to form a foundation for ITS SR 3.4.12.4. This change provides a discrete period of time to perform the Channel Functional Test without delaying entry into the Mode of Applicability for LTOP. The change provides an exception to the requirements of SR 4.0.4 (CTS 4.0.4). This option may be exercised in cases where an unplanned shutdown below 430 °F is necessary as a result of a Required Action specifying a unit shutdown, or other plant evolutions requiring a expedited cooldown of the plant. This change is acceptable because the PORVs are otherwise known to be operable and the performance of the Channel Functional Test merely confirms this operability.	SR 3.4.12.4 Note	4.1 (4)a	6

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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CAT.
	3.4.13 PCS Operational LEAKAGE			
3.4.13 L.1	The proposed change restates the CTS 4.2 Table 4.2.2 item 7 requirement of an evaluation of PCS leakage on a "daily" basis, to the ITS SR 3.4.13.1 requirement of every 72 hours. Furthermore, two Notes are added which are associated with SR 3.4.13.1. Relaxing the surveillance interval from "daily" to "72 hours" is acceptable because early warning of leaks inside containment is provided by the instrumentation required by proposed ITS 3.4.15. In addition, make-up water to the PCS and level indication in the make-up tank are frequently monitored by the operator. Operating experience has shown that performance of PCS leakage measurements on a Frequency of 72 hours is reasonable. The SR Notes are acceptable because steady state operation is required to perform a proper water inventory balance, and are necessary to avoid potential conflict with SR 3.0.4. The addition of these changes are consistent with STS.	SR 3.4.13.1	4.2 Table 4.2.2 Item 7	7
3.4.13 L.2	The proposed change restates the CTS 3.1.5b requirements regarding "all" PCS leakage, to form a foundation for ITS LCO 3.4.13c, "identified" leakage. The CTS limits "all" leakage to 10 gpm, whereas the ITS limits only "identified" leakage to 10 gpm. Although adoption of the ITS classification of "identified leakage" allows an additional PCS leakage rate of 1 gpm (when combined with unidentified leakage), this change is acceptable because the basis of the requirement to limit degradation of the PCS is still preserved.	LCO 3.4.13c	3.1.5b	1

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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CAT.
	3.4.14 PCS Pressure Isolation Valve (PIV) Leakage			
3.4.14 L.1	The proposed change restates the CTS Table 3.17.6 item 17 requirement that two channels of SDC Suction Valve Interlocks be Operable "above 200 psia PCS pressure," to form a foundation for ITS 3.4.14 Applicability of "...MODES 1, 2, and 3, and in MODE 4, except during the SDC mode of operation, or transition to or from the SDC mode of operation." The Applicability of ITS 3.4.14 is acceptable because it continues to require the interlock function to be Operable whenever a potential for overpressurizing the SDC system piping from the PCS exists, and contains the appropriate requirements to ensure the integrity of the SDC system is not violated.	LCO 3.4.14 Applicability	Table 3.17.6 Item 17	2
3.4.14 L.2	The proposed change omits the CTS 4.3i requirement regarding PIV integrity and the requirement that "...the integrity of the remaining check valve in each high pressure line having a leaking valve shall be determined and recorded daily and the position of the other closed valve located in that pressure line shall be recorded daily." The ITS does not specify that the integrity of the remaining check valve be determined daily because this action represents a condition which is known to exist at the time of isolation and must continue to be met by the requirements of SR 3.0.1.	N/A	4.3i	3
3.4.14 L.3	The proposed change restates the CTS 3.3.3 and 4.3h requirement of periodic leakage testing of the specified PIVs from "...Cold Shutdown Condition for more than 72 hours...," to the ITS SR 3.4.14.1 Frequency of "...MODE 5 for 7 days..." The ITS allows the plant to be in MODE 5 for up to 7 days before testing is required. The CTS allows the plant to be in Cold Shutdown Conditions for 3 days before testing is required. The extended period of MODE 5 operation allowed by the ITS does not significantly increase the probability of a malfunction of the PIVs because the change in plant status over the four additional days of shutdown time does not change significantly.	SR 3.4.14.1 Frequency	3.3.3 4.3h	7

Categories:

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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CAT.
3.4.14 L.4	The proposed change restates the CTS 3.3.3 and 4.3h testing frequency from "...Refueling Shutdown" to the ITS SR 3.4.14.1 Frequency of "18 months." The CTS Frequency of "... Refueling Shutdown Condition" is essentially the same as the ITS Frequency of "18 months." This change is acceptable because PIV testing will continue to be performed consistent with 10 CFR 50.55a and within the frequency allowed by ASME Code Section XI.	SR 3.4.14.1 Frequency	3.3.3 4.3h	7
	3.4.15 PCS Leakage Detection Instrumentation			
3.4.15 L.1	CTS Table 3.17.6 item 7 requires four PCS leakage detection channels and CTS 3.17.6.7.1 requires restoration "... prior to the next reactor startup from Cold Shutdown." ITS LCO 3.4.15 requires three of the four listed channels to be operable. This is a less restrictive change because the CTS requires four channels and the ITS only requires three channels to be operable. It is acceptable because the remaining Operable channels are capable of detecting a significant degradation of the primary coolant pressure boundary.	LCO 3.4.15	Table 3.17.6 Item 7 3.17.6.7.1 3.17.6.7.2	1
	3.4.16 PCS Specific Activity			
3.4.16 L.1	CTS 3.1.4b allows operation with PCS specific activity > 1.0 but < 40 µCi/gram for 72 hours at a time, for up to 36 days per year. ITS 3.4.16 does not contain an annual cumulative time limit under this condition and is, therefore, less restrictive. This is acceptable per guidance provided in Generic Letter 85-19.	3.4.16	3.1.4b	3
3.4.16 L.2	The proposed change adds the ITS 3.4.16 Action Note to Condition A, stating that LCO 3.0.4 is not applicable. This is a less restrictive change, which excludes the Mode change restriction of LCO 3.0.4. It is acceptable due to significant conservatisms, and the ability to restore specific activity excursions while remaining at, or proceeding to power operation.	3.4.16 Condition A Action Note	N/A	3

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
3. Relaxation of Required Actions
4. Relaxation of Allowed Outage Time
5. Deletion of SR
6. Relaxation of Surveillance Requirement Acceptance Criteria
7. Relaxation of Surveillance Frequency
8. Deletion of Requirement for 30-day Special Report to NRC

TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CAT.
3.4.16 L.3	CTS 3.1.4e requires that sampling and analysis be performed whenever the specific activity of the primary coolant is > 100/E µCi/gram. ITS 3.4.16 does not contain this requirement, and is therefore, less restrictive. This is acceptable because testing and analysis is already required to verify restoration of the specific activity to within limits and does not need to be otherwise stated.	3.4.16	3.1.4e	3
3.4.16 L.4	CTS Table 4.2.1 item 1 requires gross activity determination "...3 times/7 days with a maximum of 72 hours between samples." ITS SR 3.4.16.1 requires verification every 7 days. This is a less restrictive change due to the surveillance frequency. The proposed change is acceptable because of the low probability of gross fuel failure and the alternate indication available to alert the operators if a gross fuel failure were to occur.	SR 3.4.16.1	Table 4.2.1 Item 1	7

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
3. Relaxation of Required Actions
4. Relaxation of Allowed Outage Time
5. Deletion of SR
6. Relaxation of Surveillance Requirement Acceptance Criteria
7. Relaxation of Surveillance Frequency
8. Deletion of Requirement for 30-day Special Report to NRC

TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
	3.5 EMERGENCY CORE COOLING SYSTEM (ECCS) **3.5.1 Safety Injection Tanks (SITS)**			
3.5.1 L.1	CTS 3.3.2 requires the reactor to be placed in cold shutdown when one SIT is not restored to Operable status within the allowed outage time. ITS 3.5.1 Required Action C.1 requires the plant to be placed in MODE 3 when one SIT is not restored to Operable status. Required Action C.1 places the plant in a condition in which the SITs are no longer necessary to mitigate the consequences of an accident. Requiring the plant to be placed in a mode in which the LCO does not apply is consistent with the philosophy of STS.	3.5.1 Required Action C	3.3.2	3
3.5.1 L.2	CTS 3.3.2a allows one safety injection tank to be inoperable for no more than one hour. ITS 3.5.1 allows one safety injection tank to be inoperable for 72 hours due to its boron concentration not being within limits. The SITs are passive devices and the boron concentration is relatively stable. Therefore, deviations from the normal boron concentration band are generally small and the impact on a LOCA is minor. In addition, the volume of the SIT is still available for injection. Since the boron requirements are based on the average boron concentration of the total volume of three SITs, the consequences are less severe than they would be if an SIT were not available for injection.	3.5.1 Condition A	3.3.2a	4
3.5.1 L.3	CTS 3.3.2 allows one of the ECCS components required by CTS 3.3.1 to be made inoperable for a specified time. Since CTS 3.3.2 does not provide an explicit action for multiple component inoperabilities, the plant would then invoke the requirements of CTS LCO 3.0.3. The purpose of CTS 3.3.2 is to ensure a loss of ECCS function does not occur. ITS 3.5.1 permits multiple component inoperabilities without a corresponding reduction in allowed outage time provided the functional requirements of the LCO are maintained. The change is acceptable since ITS 3.5.1 ensures that a loss of ECCS function will not occur. This change is consistent with STS.	3.5.1 Condition A	3.3.2	3

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
3. Relaxation of Required Actions
4. Relaxation of Allowed Outage Time
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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
3.5.1 L.4	CTS 4.6.4a states that SIT motor operated isolation valve position is verified "by observing valve position indication and (the) valve itself." CTS 4.6.4a also requires a verification that the breakers for the SIT motor operated isolation valves are locked opened. These actions are not included within ITS because these details are not necessary to describe, or are not pertinent to any actual regulatory requirement. CTS 4.2 Table 4.2.2 item 10 contains a surveillance requirement to verify SIT pressure is less than the high alarm. This requirement has been deleted since the safety analyses do not assume a maximum SIT pressure. This change is consistent with STS.	LCO 3.5.1	4.6.4a & 4.2	6
	SPECIFICATION 3.5.2 ECCS - OPERATING			
3.5.2 L.1	CTS 3.3.2 requires the reactor to be placed in cold shutdown within 84 hours when an ECCS component is not restored to Operable status within the allowed outage time. ITS 3.5.2 Required Action B.2 requires the PCS temperature to be reduced to < 325°F within 24 hours when an ECCS train is not restored to Operable status within the allowed outage time. Required Action B.2 places the plant in a condition in which two trains of ECCS are no longer necessary to mitigate the consequences of an accident assuming a single failure. Requiring the plant to be placed in a mode in which the LCO no longer applies is consistent with the philosophy of STS.	3.5.2 Required Action B	3.3.2	3

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
3. Relaxation of Required Actions
4. Relaxation of Allowed Outage Time
5. Deletion of SR
6. Relaxation of Surveillance Requirement Acceptance Criteria
7. Relaxation of Surveillance Frequency
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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
3.5.2 L.2	CTS 3.3.2.6, CTS 3.3.2c, CTS 3.3.2d, and CTS 3.3.2f require their respective inoperable ECCS component be restored to Operable status within 24 hours. ITS 3.5.2, Condition A, allows one or more ECCS train to be inoperable for 72 hours provided at least 100% of the ECCS flow equivalent to a single Operable ECCS train is available. Thus, the ITS 3.5.2 allows a combination of HPSI and LPSI subsystems to be inoperable for up to 72 hours provided the flow assumed to be delivered by a single ECCS train is available. By stipulating a 100% ECCS flow equivalent, Condition A preserves the safety function of the ECCS system while allowing some period of time for correcting ECCS component inoperabilities. This allowance is acceptable because of the redundancy of trains and the diversity of subsystems and recognition of the fact that the inoperability of one component in a train does not necessarily render the ECCS incapable of performing its intended safety function. This change is consistent with STS.	3.5.2 Condition A	3.3.2	4
3.5.2 L.3	CTS 3.3.2 contains a provision which allows one of the ECCS components required by CTS 3.3.1 to be made inoperable for a specified time. Since the CTS does not provide an explicit action for multiple component inoperabilities, the plant would then invoke the requirements of CTS LCO 3.0.3. CTS 3.3.2 is to ensure a loss of ECCS function does not occur by limiting the ECCS components that can be removed from service to only one component at any given time. ITS 3.5.2 permits multiple component inoperabilities without a corresponding reduction in allowed outage time provided the functional requirements of the LCO are maintained. This change is consistent with STS.	3.5.2 Condition A	3.3.2	3

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
3. Relaxation of Required Actions
4. Relaxation of Allowed Outage Time
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6. Relaxation of Surveillance Requirement Acceptance Criteria
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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
3.5.2 L.4	CTS 4.6.1a contains requirements for testing the Safety Injection System by verifying that components which receive an actuation signal actuate to their correct position. Specifying that valve position verification be performed by control board indication or visual observation does not constitute a requirement assumed in the safety analyses. CTS 4.6.3a states that "alternate manual starting (of the safety injection pumps and shutdown cooling pumps) between the control room console and the local breaker shall be practiced in the test program." The ability to demonstrate the manual starting capability of the ECCS pumps from various plant locations is not assumed in the safety analyses and is not relevant to demonstrating that the pumps are capability of meeting their intended safety function. Since the above details are not necessary to describe, or are not pertinent to, any actual regulatory requirement, they are deleted. This change is consistent with STS.	SR 3.5.2.5	4.6.1a & 4.6.3a	6
3.5.4 REFUELING WATER STORAGE Safety Injection Tanks (SITS)				
3.5.4 L.1	CTS 3.3.1a specifies the required parameters for the SIRW Tank (i.e., volume, boron concentration and temperature) but does not provide explicit actions if one or more parameters are not within limit. Therefore, whenever an SIRW Tank parameter is outside its limit, the plant applies the actions of CTS LCO 3.0.3. ITS 3.5.4 Condition A addresses the condition when the SIRW Tank boron concentration, or the SIRW Tank borated water temperature, is not within limit and provides a Completion time of 8 hours to restore the out-of-limit parameter to within limit. The 8 hour restoration time was selected considering the time required to change boron concentration or temperature and that the contents of the tank are still available for injection. This change is consistent with STS.	Condition A	3.3.1a	3

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
3. Relaxation of Required Actions
4. Relaxation of Allowed Outage Time
5. Deletion of SR
6. Relaxation of Surveillance Requirement Acceptance Criteria
7. Relaxation of Surveillance Frequency
8. Deletion of Requirement for 30-day Special Report to NRC

TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
3.5.4 L.2	CTS 4.17, Table 4.17.6 item 3 specifies a Channel Check of the SIRW Tank temperature instrumentation. ITS SR 3.5.4.1 requires a verification that the SIRWT temperature is ≥ 40°F and ≤ 100°F. By definition of a Channel Check within CTS, the temperature verification requirement of ITS SR 3.5.4.1 is included in CTS 4.17. The frequency associated with the Channel Check of CTS 4.17 is every 12 hours. The frequency associated with the temperature verification of ITS SR 3.5.4.1 is every 24 hours. Therefore, the requirement of ITS SR 3.5.4.1 is less restrictive than the requirement of CTS 4.17. Relaxing the frequency at which the SIRWT temperature is verified to 24 hours has been shown to be sufficient due to the large mass of water in the SIRWT and the time necessary to cause a change in tank temperature. This change is consistent with STS.	SR 3.5.4.1	4.17	7

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
3. Relaxation of Required Actions
4. Relaxation of Allowed Outage Time
5. Deletion of SR
6. Relaxation of Surveillance Requirement Acceptance Criteria
7. Relaxation of Surveillance Frequency
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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
	SECTION 3.6.1, Containment			
3.6.1 L.1	CTS 4.5.2b(1) states that the total leakage from all penetrations and isolation valves shall not exceed 0.60 L_a. ITS 3.6.1 states the leakage limit for Type B and C testing is < 0.60 L_a only during the first plant startup following testing performed in accordance with 10 CFR 50, Appendix J, Option A. After this, the new limit will become ≤ 1.0 L_a. This change is acceptable since the overall containment leakage requirements of ITS 3.6.1 remains valid at all times. The change is less restrictive since the acceptance criteria of < 0.60 L_a for Type B and C tests will now become 1.0 L_a except during the first unit startup following testing performed in accordance with 10 CFR 50, Appendix J.	SR 3.6.1.3	4.5.2b(1)	1, 6
3.6.2 L.2	CTS 3.6.1c requires Containment Integrity be maintained "when positive reactivity changes are made by boron dilution or control rod motion (except for testing one control rod at a time)." In the ITS, containment integrity is ensured by operating the plant within the limits established in LCO 3.6.1, LCO 3.6.2, and LCO 3.6.3. The Applicability for these specifications is MODES 1, 2, 3, and 4. The ITS contains no requirement equivalent to containment integrity in MODE 5, and only a less stringent requirement in MODE 6 referred to as containment closure. The requirements of the ITS are less restrictive than the CTS since the ITS would allow positive reactivity changes and control rod motion in MODES 5 or 6. This change is acceptable since the ITS continues to ensure that reactivity changes from boron dilutions or control rod motion can be made without approaching a condition (criticality) in which containment integrity would be needed.	LCO3.6.1 LCO 3.6.2 LCO 3.6.3	3.6.1c	1, 2

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
3. Relaxation of Required Actions
4. Relaxation of Allowed Outage Time
5. Deletion of SR
6. Relaxation of Surveillance Requirement Acceptance Criteria
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8. Deletion of Requirement for 30-day Special Report to NRC

TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
	SECTION 3.6.2, Containment Air Locks			
3.6.2 L.1	CTS 4.5.2c(3) states if air lock door seal leakage is greater than $0.023L_a$, repairs shall be initiated immediately and completed within 7 days. ITS 3.6.2 Required Actions do not require repairs to be initiated immediately or specify when they must be complete since the closed OPERABLE door ensures that the safety function for containment is met. This is a less restrictive change since the specific repair actions are not specified in the ITS.	3.6.2	4.5.2c(3)	3
3.6.2 L.2	CTS 4.5.2c(4) specifies actions if air lock door seal leakage causes the total containment leakage to exceed its limit. This includes testing the remaining Operable door within 4 hours. ITS 3.6.2 Condition A provide ACTIONS for an air lock doors being inoperable and does not require testing the Operable door. This change is less restrictive since additional actions beyond those addressed by the ITS are not needed to maintain containment OPERABILITY.	4.5.2c(4)	3.6.2 Required Action A	3
3.6.2 L.3	The CTS does not allow entry and exiting of the containment when one door in both containment air locks are inoperable. ITS 3.6.2 Condition A, allows containment ingress and egress for 7 days under administrative controls if both air locks are inoperable. This allowance is acceptable due to the low probability of an event that could pressurize the containment during the short time the Operable door is expected to be opened.	3.6.2 Required Action A Note 2	4.5.2.c	3

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
3. Relaxation of Required Actions
4. Relaxation of Allowed Outage Time
5. Deletion of SR
6. Relaxation of Surveillance Requirement Acceptance Criteria
7. Relaxation of Surveillance Frequency
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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
3.6.2 L.4	CTS 4.5.2c(3) does not address multiple air locks with inoperable doors. Thus, if multiple inoperabilities occurred, entry into LCO 3.0.3 would be required. ITS 3.6.2 Condition A provides Required Actions and Completion Times for one or more containment air locks with one containment air lock door inoperable. The ITS represents a relaxation from the CTS since the it allows one inoperable door in the personnel air lock to exist concurrently with one inoperable door in the emergency air lock and allows separate entry condition tracking for each air lock. This change is acceptable since the ITS Required Actions ensures a leak tight containment barrier is established and maintained Operable.	3.6.2 Condition A	4.5.2c(3)	3
	CTS 4.5.2.c provides corrective action for excessive air lock seal leakage, but no specific actions for an inoperable air lock door interlock door mechanism. Because the definition of OPERABILITY would define air lock OPERABILITY with regards to the iinterlock mechanism, an inoperable air lock interlock would be an undefined condition which would requrie a plant shutdown in accordance with CTS 3.0.3. The addition of ITS 3.6.2 ACTION B would permit continued power operation under the successful completion of the associated Required Actions, and would maintain containment integrity. This is a less restrictive change in that it would allow the plant to perform actions similar to an inoperable air lock door rather than require a shutdown.	3.6.2 Action B	4.5.2.c	3, 4
	SECTION 3.6.3, Containment Isolation Valves			
3.6.3 L.1	CTS Table 4.2.2 item 13.a specifies that the Containment Purge and Ventilation Isolation Valves shall be determined closed "at least once per 24 hours." ITS SR 3.6.3.1 changes the frequency for this verification from 24 hours to 31 days. This change is reasonable because these valves are not allowed to be open in MODES 1-4.	SR 3.6.3.1	Table4.2.2 item13.a	7

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
3.6.3 L.2	CTS 3.6.1 Action "c" requires the plant to be placed in at least Hot Shutdown within 6 hours and in Cold Shutdown within the following 30 hours for an inoperable CIV in a penetrations with a closed piping system and only one CIV. For this same inoperability, ITS 3.6.3 Condition C allows the affected penetration to be unisolated for 72 hours. The ITS is less restrictive than the CTS since it allows 72 hours to isolate the affected penetration versus a forced shutdown. The 72 hour period provides the necessary time to perform repairs on a failed CIV when relying on an intact closed system. ITS 3.6.3 also allows isolation devices in high radiation areas to be verified by use of administrative means." This allowance is acceptable since the probability of a valve misalignment is small.	3.6.3 Condition C	3.6.1 Action "c"	3, 4
3.6.3 L.3	CTS 4.5.3d requires a visual check that all locked-closed manual containment isolation valves are closed and locked except for valves that are open under administrative controls. ITS SR 3.6.3.2 and SR 3.6.3.3 allow valves and blind flanges in high radiation areas to be verified by administrative means. This change is acceptable since high radiation areas are restricted such that the probability of valve misalignment is small.	SR 3.6.3.2 SR 3.6.3.3	4.5.3d	6
3.6.3 L.4	CTS 4.5.3d requires a visual check that all locked-closed manual containment isolation valves are closed and locked except for valves that are open under administrative controls. ITS SR 3.6.3.2 and SR 3.6.3.3 allow valves that are locked, sealed or otherwise secured in position to be verified by administrative means. This change is acceptable since these valves are verified closed when they are locked, sealed, or otherwise secured in position.	SR 3.6.3.2 SR 3.6.3.3	4.5.3d	6
3.6.3 L.5 OPEN	CTS 4.5.3a, CTS 4.5.3b, and CTS 4.2 Table 4.2.2, items 13.a and 13.b contain details that are not necessary to describe, or are not pertinent to, any actual regulatory requirement. Since these details are not necessary to describe, or are not pertinent to, any actual regulatory requirement, they can be deleted without an impact to public health and safety.	N/A	4.5.3a 4.5.3b 4.2 Tbl 4.2.2 #13a #13b	5, 6

Categories:

1. Relaxation of LCO
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6. Relaxation of Surveillance Requirement Acceptance Criteria
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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
3.6.3 L.6	CTS 4.5.3b requires that each containment isolation valve be demonstrated Operable by verifying it actuates to its required position. ITS SR 3.6.3.6 does not require CIVs that are locked, sealed, or otherwise secured in position to be tested. This is because these valves are already in the position necessary to perform the containment isolation function. CTS 4.5.3b requires that each containment isolation valve be demonstrat4d Operable by verifying it actuates to ITS required position. In the ITS, an equivalent test is required by ITS R 3.6.3.6. However, ITS SR 3.6.3.6 does not require containment isolation valves under administrative controls that are locked, sealed, or otherwise secured in position to be tested. This is because these valves are already in the position necessary to perform the containment isolation function. Thus, there is no need to verify these valves that are locked, sealed, or other wise secured in position is a relaxation from the requirements of the CTS. This less restrictive change is acceptable.	SR 3.6.3.6	4.5.3b	Unique

Categories:

1. Relaxation of LCO
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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
	SECTION 3.6.6, Containment Cooling Systems			
3.6.6 L.1 (BYS)	CTS 3.4.2 allows one of the components listed in Specification 3.4.1 to be inoperable for a period of up to seven days. CTS 3.4.3 allows a total of two of the components listed in Specification 3.4.1a or b to be inoperable at any one time for up to 24 hours. ITS 3.6.6 allows one or more trains of containment cooling to be inoperable for 72 hours as long as at least 100% of the cooling capability equivalent to a single Operable containment cooling train is available. This is a less restrictive change since a train of containment cooling is allowed to be inoperable in the ITS for 72 hours as opposed to seven days or 24 hours in the CTS. This change is acceptable since the ITS still requires an equivalent of one train of containment cooling be Operable.	LCO 3.6.6	3.4.1 3.4.2 3.4.3	1
	CTS 4.5.2.c provides corrective action for excessive air lock seal leakage, but no specific actions for an inoperable air lock door interlock door mechanism. Because the definition of OPERABILITY would define air lock OPERABILITY with regards to the interlock mechanism, an inoperable air lock interlock would be an undefined condition which would require a plant shutdown in accordance with CTS 3.0.3. The addition of ITS 3.6.2 ACTION B would permit continued power operation under the successful completion of the associated Required Actions, and would maintain containment integrity. This is a less restrictive change in that it would allow the plant to perform actions similar to an inoperable air lock door rather than require a shutdown.	3.6.2 Action B	4.5.2.c	3, 4

Categories:

1. Relaxation of LCO
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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
p3.6.6 L.2 (BYS)	CTS 3.4.2 and 3.4.3 require that "If the inoperable component has not been restored to operability within an additional 48 hours the reactor shall be placed in a cold shutdown condition within 24 hours." For the same inoperability, ITS 3.6.6 Required Action B requires the plant to be placed in MODE 4 within a total of 30 hours. The "additional 48 hours" allowance in the CTS is not included in the ITS. Since the equipment is not needed below 300°F, only requiring that the plant be placed in MODE 4 is appropriate.	3.6.6 Required Action B	3.4.2 3.4.3	3
	CTS 4.5.2.c provides corrective action for excessive air lock seal leakage, but no specific actions for an inoperable air lock door interlock door mechanism. Because the definition of OPERABILITY would define air lock OPERABILITY with regards to the interlock mechanism, an inoperable air lock interlock would be an undefined condition which would require a plant shutdown in accordance with CTS 3.0.3. The addition of ITS 3.6.2 ACTION B would permit continued power operation under the successful completion of the associated Required Actions, and would maintain containment integrity. This is a less restrictive change in that it would allow the plant to perform actions similar to an inoperable air lock door rather than require a shutdown.	3.6.2 Action B	4.3.2.c	3, 4
3.6.6 L.3 OPEN	CTS 4.6.2a specifies that for the Containment Spray System test, "The test shall be performed with the isolation valves in the spray supply lines at the containment blocked closed." CTS 4.6.2c specifies that for the Containment Spray System test, "The test will be considered satisfactory if visual observations indicate all components have operated satisfactorily." Since these details are not necessary to describe, or are not pertinent to, any actual regulatory requirement, they can be deleted without an impact to public health and safety.	N/A	4.6.2a 4.6.2c	6

Categories:

1. Relaxation of LCO
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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
3.6.6 L.4	CTS 4.6.3a states that "alternate manual starting [of the containment spray pumps] between the control room console and the local breaker shall be practiced in the test program." CTS 4.6.3b requires the containment spray pumps "...operate for at least fifteen minutes." Since the above details are not necessary to describe, or are not pertinent to, any actual regulatory requirement, they can be deleted without an impact of public health and safety.	N/A	4.6.3a 4.6.3b	6
SECTION 3.6.7, Hydrogen Recombiners				
3.6.7 L.1	CTS 3.6.4 specifies the requirements for the hydrogen recombiners but does not include an LCO 3.0.4 exception. ITS 3.6.7 specifies the requirements for the hydrogen recombiners and includes a Note that states "LCO 3.0.4 is not applicable." This is a less restrictive change since the ITS would allow the plant to change MODES while relying on an Action as opposed to the CTS which would not allow this change. This is acceptable given the long Completion Time of 30 days if one redundant recombiner is inoperable.	3.6.7 Required Action A Note	3.6.4	3
3.6.7 L.2	CTS Table 4.2-2 Item 11.a specifies that a hydrogen recombiner unit functional test be performed at least once per 6 months for each unit. ITS SR 3.6.7.1 specifies this test be performed every 18 months. The change from 6 months to 18 months is a less restrictive change and is acceptable based on the simple design of the unit and the surveillance generally passes when performed at the 6 month frequency.	SR 3.6.7.1	Table 4.2-2 item 11.a	7
3.6.7 L.3	CTS Table 4.2-2, Footnote * to Item 11.a requires the minimum recombiner heater sheath temperature increase be measured using installed or portable temperature monitoring instrumentation. Since the above details are not necessary to describe, or are not pertinent to, any actual regulatory requirement, they can be deleted without an impact of public health and safety.	N/A	Table 4.2-2 Footnote * to item 11.a	6

Categories:

1. Relaxation of LCO
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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
3.6.7 L.4	CTS Table 4.2-2, Item 11.b.3 requires the integrity check of the recombiner heater electrical circuits be performed "immediately following" the system functional test of Item 11.a. Since the above details are not necessary to describe, or are not pertinent to, any actual regulatory requirement, they can be deleted without an impact of public health and safety.	N/A	Table 4.2-2 item 11.b.3	6
3.6.7 L.5	CTS Table 4.2-2, Item 11.b.2 lists examples of abnormal conditions that are to be sought during the visual examination of the hydrogen recombiners. These examples are neither exhaustive or explicit. Since the above details are not necessary to describe, or are not pertinent to, any actual regulatory requirement, they can be deleted without an impact of public health and safety.	N/A	CTS Table 4.2-2, Item 11.b.2	6

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
3. Relaxation of Required Actions
4. Relaxation of Allowed Outage Time
5. Deletion of SR
6. Relaxation of Surveillance Requirement Acceptance Criteria
7. Relaxation of Surveillance Frequency
8. Deletion of Requirement for 30-day Special Report to NRC

TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
	3.7 PLANT SYSTEMS **3.7.1 Main Steam Safety Valves (MSSVs)**			
3.7.1 L.1	CTS 3.1.7.2 requires MSSV operability above 210 F. ITS 3.7.1 requires MSSV operability above 300 F. This is acceptable because the additional energy stored in the primary in this condition is minimal and the saturation pressure for 300°F is approximately 60 psia which is well below the lift settings of the MSSVs. This is a less restrictive change which maintains consistency with the intent of STS.	3.7.1	3.1.7	2
	3.7.2 Main Steam Isolation Valves (MSIVs)			
3.7.2 L.1	CTS 3.5.3 does not allow for a certain amount of time to restore an MSIV to OPERABLE status prior to being required to be in a lower MODE within 6 hours. ITS 3.7.2 Action A.1 allows an 8 hour period to restore the valve to OPERABLE before requiring the transition to a lower Mode within 6 hours. This is acceptable because of the short amount of time allowed for this increased unavailability and the low probability of an accident occurring during this time. This is a less restrictive change, consistent with STS.	3.7.2	3.5.3	4
3.7.2 L.2	CTS 3.5.3 requires shutdown to Cold Shutdown (≤ 210°F) if one MSIV remains inoperable in Hot Shutdown. ITS 3.7.2 Action D.2. requires shutdown to MODE 4 (≤ 300°F) if one MSIV remains inoperable in Mode 3. Going to MODE 4 rather than Cold Shutdown is acceptable because the additional energy stored in the primary coolant in this condition is minimal. This is a less restrictive change which maintains consistency with the intent of STS.	3.7.2	3.5.3	2

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
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7. Relaxation of Surveillance Frequency
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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
3.7.2 L.3	CTS 3.5.3 does not allow the provision to shut an inoperable MSIV and be able to remain in MODE 2 or 3. ITS 3.7.2 Condition C does allow the provision to shut an inoperable MSIV and be able to remain in MODE 2 or 3. This is acceptable because with the affected MSIV closed, as required by ITS 3.7.2 Condition C, the MSIV is performing the intended safety function by being in the position assumed in the safety analysis. This is a less restrictive change, consistent with STS.	3.7.2	3.5.3	3
3.7.2 L.4	CTS 3.5.1 Applicability is above 300°F. ITS 3.7.2. Applicability is Mode 1, and Modes 2 and 3 except when both MSIVs are closed and deactivated. This allows the primary coolant temperature to be higher if the MSIVs are closed and deactivated in MODES 2 and 3. This change is acceptable since the valves will be in the position assumed in the safety analyses. This is a less restrictive change, consistent with STS.	3.7.2	3.5.1	2
3.7.5 Auxiliary Feedwater (AFW) System				
3.7.5 L.1	CTS 3.5 does not provide a special allowance to restore to Operable status one steam supply to the steam driven AFW pump before declaring the pump inoperable. ITS 3.7.5 Required Action A.1 allows 7 days for restoration of the steam supply prior to declaring the turbine driven pump inoperable. This less restrictive change, consistent with STS, is acceptable since there is a redundant steam supply for the pump as well as a redundant electric driven pump.	3.7.5	3.5	1

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
3. Relaxation of Required Actions
4. Relaxation of Allowed Outage Time
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6. Relaxation of Surveillance Requirement Acceptance Criteria
7. Relaxation of Surveillance Frequency
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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
3.7.5 L.2	CTS 3.5.3 requires the reactor to be placed in CTS Cold Shutdown (ITS MODE 5) if AFW does not satisfy other requirements of Specification 3.5. ITS 3.7.5 Required Action C.2 requires the plant to be placed in MODE 4, without reliance on a steam generator for heat removal, if the AFW system does not meet Condition A and B. This change is less restrictive in that the temperature of the primary system would be permitted to be 90°F higher. This change is acceptable because the AFW System is still required to be Operable and the lowest MODE in which AFW is required by the safety analysis to be Operable is MODE 4. This is a less restrictive change, consistent with STS.	3.7.5	3.5.3	1
3.7.5 L.3	CTS 4.9a requires that the AFW pumps be started every 31 days. ITS SR 3.7.5.2 requires the pumps to be tested in accordance with the Inservice Testing Program. This change is less restrictive in that each pump will be started once every 92 days. This change is acceptable in view of the findings and recommendation in NUREG-1366 "Improvements to Technical Specifications Surveillance Requirements." This is a less restrictive change, consistent with STS.	3.7.5	4.9a	1
3.7.5 L.4	CTS 3.5.2e allows one flow control valve in each train to be inoperable for 72 hours if the corresponding redundant flow control valve in the other train is Operable. ITS 3.7.5 Condition B modifies this requirement to allow one or more trains of auxiliary feedwater to be inoperable for 72 hours as long as at least one train is available and provides AFW to both steam generators. This change is acceptable because ITS 3.7.5 Condition B requires that the flow equivalent of one train of AFW to both steam generators be available and one train of AFW can supply 100% of the AFW flow requirements to both steam generators for cooling during accident conditions. This is a less restrictive change.	3.7.5	3.5.2e	1

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
3.7.5 L.5	CTS 3.5.4, when all auxiliary feedwater pumps are inoperable, requires that power be reduced to the lowest stable power level consistent with reliable main feedwater system operation. ITS 3.7.5, Condition D does not require a power reduction, when two AFW trains are inoperable. This change is acceptable because the intent of both the ITS and CTS is to maintain the plant in a stable condition while actions are taken to restore the auxiliary feedwater system to an Operable status. This is a less restrictive change.	3.7.5	3.5.4	1
	3.7.6 Condensate Storage and Supply			
3.7.6 L.1	CTS 3.5.2 does not specify a time limit for the restoration of Condensate Storage and Supply required volume to within limits. Therefore, if the required volume is not met, CTS 3.5.3 requires the plant to be in Cold Shutdown within 24 hours. ITS 3.7.6 Required Action A.2 allows 7 days to restore the required volume. The 7 day allowance is acceptable since the redundant backup water supplies are required to be Operable. This is a less restrictive change, consistent with STS.	3.7.6	3.5.3	4
3.7.6 L.2	CTS 3.5.3 requires the reactor to be placed in a CTS Cold Shutdown condition if the volume of condensate does not satisfy the requirements. ITS 3.7.6, Required Action B.2, requires the plant to be placed in MODE 4 without reliance on a steam generator for heat removal if the volume of condensate does not satisfy requirements. This change is acceptable because the Condensate Storage and Supply is required to be OPERABLE whenever the system is needed for accident mitigation by the safety analysis and MODE 4 is the lowest Mode to which Condensate Storage and Supply is required by the safety analysis to be OPERABLE in ITS. This is a less restrictive change, consistent with STS.	3.7.6 R.A. B.2	3.5.3	2

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
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6. Relaxation of Surveillance Requirement Acceptance Criteria
7. Relaxation of Surveillance Frequency
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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
	3.7.7 Component Cooling Water (CCW) System			
3.7.7 L.1	CTS 3.4.1, 3.4.2 and 3.4.3 allow one CCW component to be inoperable for 7 days and two CCW components to be inoperable for 24 hrs. ITS 3.7.7 allows one train of CCW to be inoperable for 72 hours. This is acceptable because the other train is operable. This is a less restrictive change consistent with the intent of the STS.	3.7.7	3.4.1 3.4.2	4
	3.7.8 Service Water System (SWS)			
3.7.8 L.1	CTS 3.4.1, 3.4.2 and 3.4.3 allow one SWS component to be inoperable for 7 days and SWS train components to be inoperable for 24 hrs. ITS 3.7.8 allows one train of CCW to be inoperable for 72 hours. This is acceptable because the other train is Operable. This is a less restrictive change consistent with the intent of the STS.	3.7.8	3.4.1 3.4.2 3.4.3	4

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
	3.7.10 Control Room Ventilation (CRV) Filtration			
3.7.10 L.1	CTS 4.2, Table 4.2.3, item 2.a requires verification that the Control Room Ventilation system automatically switches into the emergency mode of operation on a containment high pressure (CHP) and high radiation (CHR) test signal. The Applicability of this requirement is "above COLD SHUTDOWN, during REFUELING OPERATIONS, during movement of irradiated fuel assemblies, and during movement of a fuel cask in or over the Spent Fuel Pool." ITS SR 3.7.10.3 requires a verification that each CRV Filtration train actuates on an actual or simulated actuation signal. The requirements and Applicability of CTS 4.2, Table 4.2.3, item 2.a and ITS SR 3.7.10.3 are similar except ITS SR 3.7.10.3 does not require them to be met during movement of irradiated fuel assemblies in the SFP, or during movement of a fuel cask in or over the SFP. This is acceptable and consistent with plant design because the instruments used to initiate the automatic actuation signals are not capable of detecting an increase in radiation levels in the fuel handling building. The plant operators are made aware of any movement of irradiated fuel or fuel casks in the fuel handling building and could manually initiate the emergency CRV mode when necessary.	SR 3.7.10.3	Table 4.2.3 Item 2.a	2
	3.7.12 Fuel Handling Area Ventilation System			
3.7.12 L.1	CTS 4.2, Table 4.2.3 item 2.c requires a verification that the Fuel Pool Ventilation System is Operable by initiating flow through the HEPA filter and charcoal adsorbers from the control room at least once per refueling cycle. ITS 3.7.12 does not contain this surveillance requirement since it is redundant to the actual requirement of the LCO. This change is acceptable because ITS LCO 3.7.12 requires that the Fuel Handling Area Ventilation System be Operable and aligned in the emergency filtration mode with one exhaust fan in operation. This is a less restrictive change.	3.7.12	Table 4.2.3 Item 2.c	3

Categories:

1. Relaxation of LCO
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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
	3.7.15 Spent Fuel Pool (SFP) Boron Concentration			
3.7.15 L.1	CTS 4.2, Table 4.2.1, item 6, and CTS 5.4.2f require that SFP boron concentration be verified once per month. ITS SR 3.7.15.1 requires that the SFP boron concentration be verified every 7 days until a SFP assembly verification is performed following fuel movement within the SFP. This change is acceptable because the two accidents described in the safety analysis that would cause a positive reactivity addition and possible criticality in the SFP will not occur when the fuel assemblies are verified to be in their correct location with no subsequent fuel movement. This is a less restrictive change, consistent with STS.	3.7.15	Table 4.2.1 Item 6 5.4.2F	3
	3.7.17 Secondary Specific Activity			
3.7.17 L.1	CTS Table 4.2.1 Item 7 requires an isotopic analysis for Dose equivalent I-131 of the secondary coolant once per 31 days whenever the gross activity indicates iodine concentrations greater than 10% of the allowable limit or, once per 6 months whenever the gross activity determination indicates iodine concentrations below 10% of the allowable limit. However, as discussed in DOC M.1 for this specification, the extended surveillance interval of 6 months for the determination of Dose Equivalent I-131 in the secondary coolant has been deleted and future testing will be performed every 31 days. Thus, the need to perform sampling of the secondary coolant for gross radioactivity is no longer necessary and is not required by ITS 3.7.17. This is acceptable since gross radioactivity in the secondary coolant is not evaluated for radiological consequences in any of the accidents assumed in the FSAR. This is a less restrictive change, consistent with STS.	3.7.17	Table 4.2.1 Item 7	5

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
	3.8 ELECTRICAL POWER SYSTEMS **3.8.1 AC SOURCES - OPERATING**			
3.8.1 L.1	CTS 3.7.1.B.4 is revised to form a foundation for ITS 3.8.1 Required Action B.4. The CTS requires restoration of an inoperable DG within 7 days cumulative time in any calendar month, the ITS makes an allowance to have two or more separate DG inoperabilities in any one calendar month that cumulatively could exceed 7 days. Because of this allowance, the change is less restrictive, although it also results in a more restrictive change by eliminating the potential allowance of a 14-day continuous outage at the end of one month and the beginning of the next month (see 3.8.1 M.1 for additional discussion of this more restrictive change). The proposed change eliminates tracking outage time against a cumulative limit and is consistent with the STS.	3.8.1 Required Action B.4	3.7.1.B.4	3
	3.8.4 DC SOURCES - OPERATING			
3.8.4 L.1	The proposed change relexed the CTS to provide an AOT of 8 hours. The CTS do not specify an Action when one charger and one battery in one train are inoperable, thus, the provisions of LCO 3.0.3 are applied. Selection of the 8 hour Completion Time is consistent with that previously approved for the more degraded condition of one de-energized DC electrical distribution train allowed by CTS 3.7.9.c. ITS 3.8.4 represents a configuration of the DC electrical system that is less severe and presents less risk for loss of function than that allowed by CTS 3.7.9.c (ITS 3.8.9); therefore, an extension of the Completion Times to 8 hours can be made.	3.8.4 Condition A, B & C	3.7.4 3.7.9.c	4
3.8.4 L.2	The proposed change relaxed the CTS 4.7.4.6 requirement for periodic testing of cross-connected battery chargers ED-17 and ED-18. ITS 3.8.4 B.1 actions indicate that the cross-connected battery chargers must be functional and be tested under the same requirements as a normal battery charger only when the cross-connected charger is required by the Actions to be connected. The change will not adversely impact safety.	3.8.4 B.1	4.7.4.6	7

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
	3.9.1 BORON CONCENTRATION			
3.9.1 L.1	In CTS 3.8.1 the Frequency for verifying boron concentration has been changed from "on each shift" to "72 hours." This less restrictive change decreases the verification frequency from a maximum of 16 hours to a maximum of 72 hours. Considering the large volume of water in the primary coolant system (and refueling cavity during Core Alterations), and administrative controls instituted to preclude a boron dilution event, a sampling Frequency of 72 hours is adequate to identify slow changes in boron concentration.	3.9.1	3.8.1g	7
	3.9.2 NUCLEAR INSTRUMENTATION			
3.9.2 L.1	CTS 3.17.6 requires two channels of Neutron Flux Monitoring to be Operable below 10E-4% Rated Power. CTS 3.17.6.1c requires that shutdown margin be verified within 4 hours, and once each 12 hours thereafter, whenever one or two Neutron Flux Monitoring channels are inoperable. ITS 3.9.2 Required Action B.2 requires a boron concentration verification (which ensures an adequate shutdown margin for existing core conditions) if two source range channels are inoperable, and requires the verification to be performed once per 12 hours. This change is consistent with the STS as modified by approved TSTF-96, R.1. This less restrictive change eliminates the CTS required initial 4 hour verification and is not required when only one channel is inoperable. This is acceptable since core alterations and positive reactivity additions are suspended by ACTION 3.9.2.A.	3.9.2	3.17.6 3.17.6.1c	3

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
3. Relaxation of Required Actions
4. Relaxation of Allowed Outage Time
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6. Relaxation of Surveillance Requirement Acceptance Criteria
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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
	3.9.3 CONTAINMENT PENETRATIONS			
3.9.3 L.1	CTS 3.8.1b requires all automatic containment isolation valves be operable or that at least one valve in each line be closed. ITS 3.9.3d requirements are relaxed and address only those penetrations which provide direct access from the containment atmosphere to the outside atmosphere. This change is acceptable because containment pressurization resulting from an accident is not likely while in MODE 6 and, without containment pressurization, only those penetrations which provide direct atmosphere present a potential release path.	3.9.3d	3.8.1b	1
3.9.3 L.2	CTS 3.8.1c requires the containment venting and purge systems be tested and verified Operable "immediately prior to refueling operations." ITS 3.9.3 and SR 3.0.4 require the Operability of each containment purge and exhaust valves prior to entering the mode of Applicability (e.g., prior to Core Alterations or the movement of irradiated fuel assemblies within the containment). The CTS has been revised to delete the "immediately prior to refueling operation" requirement. Although the phrase "immediately prior to refueling operations" implies a conditional type frequency, proposed SR 3.9.3.2 specifies a fixed Frequency of 18 months. This change is acceptable because there is no technical basis for the CTS requirement to test and verify operable immediately prior to refueling operations. The 18 month Frequency maintains consistency with other similar instrumentation and is consistent with the STS.	3.9.3 3.0.4	3.8.1c	7

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
3. Relaxation of Required Actions
4. Relaxation of Allowed Outage Time
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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
	3.9.4 SHUTDOWN COOLING (SDC) AND COOLANT CIRCULATION - HIGH WATER LEVEL			
3.9.4 L.1	CTS 3.1.9.3 allows all flow through the reactor core to be intentionally stopped for up to 1 hour provided, in part, that the core outlet temperature stays <= 200°F and two SDC trains are Operable. ITS 3.9.4 does not contain these additional restrictions since two redundant heat removal methods are still available. While in MODE 6 with the refueling cavity water level >= 647' elevation, an increase in primary coolant system temperature above 200°F is not an immediate concern.	3.9.4	3.1.9.3	1
3.9.4 L.2	In CTS 3.1.9.3, when there are fewer Operable means of decay heat removal than required, Action 1b states that the primary coolant system temperature should be maintained as low as practical with available equipment. Since this is beyond the scope of LCO 3.9.4, Off Normal procedures are used to address ways to maintain PCS temperature. Therefore, this Action will be omitted from the ITS. This change is consistent with the STS.	3.9.4	3.1.9.3	3

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
3. Relaxation of Required Actions
4. Relaxation of Allowed Outage Time
5. Deletion of SR
6. Relaxation of Surveillance Requirement Acceptance Criteria
7. Relaxation of Surveillance Frequency
8. Deletion of Requirement for 30-day Special Report to NRC

TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
	3.9.5 SHUTDOWN COOLING (SDC) AND COOLANT CIRCULATION - LOW WATER LEVEL			
3.9.5 L.1	In CTS 3.1.9.3 when there are fewer Operable means of decay heat removal than required, Action 1b states that the primary coolant system temperature should be maintained as low as practical with available equipment. Since this is beyond the scope of LCO 3.9.5, Off Normal procedures are used to address ways to maintain PCS temperature. Therefore, this Action will be omitted from the ITS.	3.9.5	3.1.9.3 Action 1b	3

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
3. Relaxation of Required Actions
4. Relaxation of Allowed Outage Time
5. Deletion of SR
6. Relaxation of Surveillance Requirement Acceptance Criteria
7. Relaxation of Surveillance Frequency
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TABLE L - LESS RESTRICTIVE CHANGES MATRIX (DRAFT)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION	CATEGORY
	5.0 ADMINISTRATIVE CONTROLS			
5.0 L.1	CTS 4.5.2b leak rate acceptance criteria is revised to form a foundation for ITS 5.5.14, leak rate acceptance criteria. In the ITS, the acceptance criteria and testing frequency will only exist in ITS 5.5.14, "Containment Leak Rate Testing Program." The acceptance criteria in this program will be that the overall containment leakage will not exceed 1.0 La. This change is considered Less Restrictive because the acceptance criteria for CTS 4.5.2b of .60 La for Type B and C tests will now become 1.0 La in the ITS. This change is consistent with the information in CTS 6.5.14, Containment Leak Rate Test Program but is less restrictive than the information contained in the CTS 4.5.2 Section which addresses the local leak rate testing. This change maintains consistency with the STS as modified by the intent of industry owner's group generic change TSTF-52.	5.5.14	4.5.2b	6

Categories:

1. Relaxation of LCO
2. Relaxation of Applicability
3. Relaxation of Required Actions
4. Relaxation of Allowed Outage Time
5. Deletion of SR
6. Relaxation of Surveillance Requirement Acceptance Criteria
7. Relaxation of Surveillance Frequency
8. Deletion of Requirement for 30-day Special Report to NRC

TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
5.0 ADMINISTRATIVE CONTROLS						
1.0 LA.1	1.0	The definition of REACTOR CRITICAL is being relocated to plant procedures because the means to determine when the reactor is critical will be addressed in plant procedures.	Plant Procedures	10 CFR 50.59	Relocation of descriptive information from definition of REACTOR CRITICAL	3
1.0 LA.2	1.0	The reactor power determinations, using neutron flux power range instrumentation, are being relocated to plant procedures.	Plant Procedures	10 CFR 50.59	Relocation of descriptive information regarding method of determining reactor power	3
1.0 LA.3	1.0	The definition of SHUTDOWN BORON CONCENTRATION is being relocated to plant procedures because the boron concentration which provides the required amount of SHUTDOWN MARGIN will be specified in the plant procedures.	Plant Procedures	10 CFR 50.55a(g)	Relocation of descriptive information from definition of Shutdown Boron Concentration	3

Types of Changes:

1. Details of System Design and System Description Including Design Limits
2. Descriptions of Systems Operation
3. Procedural Details for Meeting TS Requirements & Related Reporting
4. Relocation of TS administrative requirements redundant to regulations

TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
3.1 REACTIVITY CONTROL SYSTEMS 3.1.1 SHUTDOWN MARGIN (SDM)						
3.1.1 LA.1	3.10.1	CTS 3.10.1 contains the requirements for Shutdown Margin including specific values based on plant conditions and configuration. This proposed change relocates the values for Shutdown Margin to the COLR. Placing the Shutdown Margin limits in the COLR does not result in a significant impact on plant safety since changes to the safety analyses (including a change in Shutdown Margin limits) are controlled by NRC approved methodologies.	COLR	NRC Approved Methodologies	Relocation of descriptive information regarding Shutdown Margin.	3
3.1.2 REACTIVITY BALANCE						
3.1.2 LA.1	4.10	CTS 4.10 requires certain reports to be filed with the AEC (NRC) at specific elapsed times after finding a reactivity anomaly. Reporting requirements are specifically identified in 10 CFR 50.72 and 73. This reporting is not required by 10 CFR 50.36c.	N/A	Regulation	Relocation of details not required by 10 CFR 50.36 criteria. Required by 10 CFR 50.72 and 50.73.	4

Types of Changes:

1. Details of System Design and System Description Including Design Limits
2. Descriptions of Systems Operation
3. Procedural Details for Meeting TS Requirements & Related Reporting
4. Relocation of TS administrative requirements redundant to regulations

TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
3.1.4 CONTROL ROD ALIGNMENT						
3.1.4 LA.1	3.10.1e	CTS 3.10.1e specifies that "The drop time of each CONTROL ROD shall be no greater than 2.5 seconds from the beginning of rod motion to 90% insertion." The discussion of "from the beginning of rod motion to 90% insertion" is a testing detail which is more appropriate to be discussed in the Bases where it will be controlled by the Bases Control Program.	Bases 3.1.4	ITS 5.5.12	Relocation of descriptive information regarding Control Rod drop time.	3
3.1.4 LA.2	3.10.4b	CTS 3.10.4b provides descriptive details related to control rod Operability which are more appropriately moved to the Bases. The details are not necessary to adequately describe actual regulatory requirements. These details will be maintained under the Bases Control Program. .	Bases 3.1.4	ITS 5.5.12	Relocation of descriptive information regarding Control Rod Operability.	1
3.1.5 SHUTDOWN AND PART-LENGTH CONTROL ROD GROUP INSERTION LIMITS						
3.1.5 LA.1	3.10.6b	CTS 3.10.6b states the shutdown rods shall not be withdrawn until normal water level is established in the pressurizer. This requirement was included to help assure an inadvertent criticality will not occur with the PCS water solid and is more appropriately addressed in plant procedures. It is not included in the proposed ITS. .	Plant Procedures	10CFR50.59	Relocation of descriptive information regarding CR withdrawal and Pressurizer water level.	2

Types of Changes:

1. Details of System Design and System Description Including Design Limits
2. Descriptions of Systems Operation
3. Procedural Details for Meeting TS Requirements & Related Reporting
4. Relocation of TS administrative requirements redundant to regulations

TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
3.2.1 LINEAR HEAT RATE						
3.2.1 LA.1	3.23.1	CTS 3.23.1 contains specific details regarding requirements for monitoring of the LHR that are not directly a part of the LCO and are addressed in the Bases of ITS 3.2.1. These details are not necessary to describe the regulatory requirement.	B3.2.1	ITS 5.5.12	Relocation of descriptive details not meeting 10 CFR 50.36 criteria	3
3.2.1 LA.2	3.23.1 Action 3	CTS 3.23.1 ACTION 3 contains specific details regarding the requirements for monitoring of LHR. The details are descriptions of methodology which are not necessary to describe the incore detection system requirements. These details are not provided in ITS LCO 3.2.1.	B3.2.1	ITS 5.5.12	Relocation of descriptive details not meeting 10 CFR 50.36 criteria.	3
3.2.1 LA.3	4.19.1.2a	CTS 4.19.1.2a contains specific details regarding the Axial Offset (AO) deviation requirements when using the excore monitoring system for monitoring of LHR. These details are not necessary to describe the Surveillance Requirement. These details have been relocated in the Bases of ITS SR 3.2.1.3.	B3.2.1	ITS 5.5.12	Relocation of descriptive details not meeting 10 CFR 50.36 criteria.	3
3.2.1 LA.4	4.19.1.2c	CTS 4.19.1.2c contains details regarding the Allowed Power Level (APL) when using the excore monitoring system for monitoring of LHR. This information is not provided in ITS SR 3.2.1.4. The details are not necessary to describe the regulatory requirement and have been relocated in the Bases of ITS SR 3.2.1.4.	B3.2.1	ITS 5.5.12	Relocation of descriptive details not meeting 10 CFR 50.36 criteria.	3

Types of Changes:

1. Details of System Design and System Description Including Design Limits
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TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
3.2.1 LA.5	4.19.1.2d	CTS 4.19.1.2d contains details regarding the requirements for monitoring the measured AO compared to the established target AO. These details are not provided in ITS SR 3.2.1.5. The details are not necessary to describe the regulatory requirement and have been relocated to the Bases of ITS SR 3.2.1.5.	B3.2.1	ITS 5.5.12	Relocation of descriptive details not meeting 10 CFR 50.36 criteria.	3
3.2.2 RADIAL PEAKING FACTORS						
3.2.2 LA.1	3.23.2	CTS 3.23.2 contains details for how to restore the peaking factors to within limits. These details are not necessary to describe the regulatory requirement and are relocated to the Bases of ITS 3.2.2 and the COLR.	B3.2.2 COLR	ITS 5.5.12 ITS 5.6.5	Procedural details for meeting TS requirements and related reporting.	3
3.2.2 LA.2	4.19.2.1	CTS 4.19.2.1 contains details for monitoring of the peaking factors. These details are not a part of the Surveillance Requirement. These details are not necessary to describe the regulatory requirement and have been moved to the Bases of ITS SR 3.2.2.1.	B3.2.2	ITS 5.5.12	Procedural details for meeting TS requirements.	3

Types of Changes:

1. Details of System Design and System Description Including Design Limits
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TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
3.3 INSTRUMENTATION 3.3.1 Reactor Protective System (RPS) Instrumentation						
3.3.1 LA.1	SR 4.18.2 1b	CTS SR 4.18.2.1b requires that if the difference between AO and ASI is greater than 0.02, the excore monitoring system shall be recalibrated." These details provide the "the necessary range and accuracy to known values of the parameter that the channel monitors" referred to in the Channel Calibration definition.	Bases 3.3.1	ITS 5.5.12	Relocation of instrument range and accuracy details to ITS Bases	3
3.3.4 Engineered Safety Features (ESF) Logic and Manual Initiation						
3.3.4 LA.1	Tables 3.17.2 & 4.17.2 Items 1.b & 1.c	CTS Tables 3.17.2 and 4.17.2 Function 1.b and 1.c contain details of logic circuits associated with these Functions. In the ITS, proposed ITS Table 3.3.4-1 requires that the SIS Actuation Logic Operable. The details of what constitutes an Operable SIS Actuation Logic are specified in the Bases.	Bases 3.3.4	ITS 5.5.12	Relocation of details describing circuit to Bases	1
3.3.6 LA.1	LCO 3.8.1	CTS 3.8.1 requires two radiation monitors that initiate containment vent and purge isolation to be OPERABLE. The requirement also describes the location of the monitors, the associated logic, and descriptive detail. These details are not necessary in the LCO and have been relocated to the Bases.	Bases 3.3.6	ITS 5.5.12	Relocation of details describing circuit to Bases	1

Types of Changes:

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TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
3.3.7 Post Accident Monitoring (PAM) Instrumentation						
3.3.7 LA.1	Table 4.17.4	CTS Table 4.17.4 requires that the Core Exit Thermocouples (CETs) be calibrated by substituting a known voltage for the thermocouple. These details are not necessary in the LCO and have been relocated to the Bases.	Bases 3.3.7	ITS 5.5.12	Relocation of procedural detail to bases	3
3.3.8 Alternate Shutdown System						
3.3.8 LA.1	Tables 3.17.5 & 4.17.5	CTS Tables 3.17.5 and 4.17.5 contain details related to Alternate Shutdown System component identification. These details are not retained in the ITS and are relocated to the Bases.	Bases 3.3.8	ITS 5.5.12	Relocation of component identifiers to Bases	1
3.3.10 Engineered Safeguards Room Ventilation (ESRV) Instrumentation						
3.3.10 LA.1	Tables 3.17.3 & 4.17.3	CTS Tables 3.17.3 and 4.17.3 contain details related to ESRV Instrumentation component identification. These details are not retained in the ITS and are relocated to the Bases.	Bases 3.3.10	ITS 5.5.12	Relocation of component identifiers to Bases	1

Types of Changes:

1. Details of System Design and System Description Including Design Limits
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4. Relocation of TS administrative requirements redundant to regulations

TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
3.4 PRIMARY COOLANT SYSTEM 3.4.1 PCS Pressure, Temperature, and Flow Departure from Nucleate Boiling (DNB) Limits						
3.4.1 LA.1	4.15	The proposed change removes the requirement "...with four primary coolant pumps in operation..." from the existing CTS 4.15, and it is not included in ITS SR 3.4.1.3, because the only requirement of LCO 3.4.1 is to meet the minimum flow. The number of primary coolant pumps required to be in operation to meet the safety analysis assumption for forced flow and core heat removal (and ultimately the acceptance criteria for DNB) is provided in ITS 3.4.4, "PCS Loops-MODES 1 and 2." This change is acceptable because details regarding the number of required pumps is adequately covered in the Bases for ITS 3.4.4, and are controlled by the Bases Control Program (ITS 5.5.12).	B3.4.4	ITS 5.5.12	Relocation of details regarding the number of pumps required to achieve minimum flow.	2
3.4.6 PCS Loops - MODE 4						
3.4.6 LA.1	3.1.9.1	In CTS 3.1.9.1, the details associated with PCS loop and SDC train Operability is moved to the Bases for ITS LCO 3.4.6. This is acceptable because this information provides details of design which are not pertinent to the actual requirement. These details are not necessary to describe actual regulatory requirements; they can be moved to the Bases and will be controlled by ITS 5.5.12.	Bases B3.4.6	ITS 5.5.12	Relocation of details	1

Types of Changes:

1. Details of System Design and System Description Including Design Limits
2. Descriptions of Systems Operation
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4. Relocation of TS Administrative Requirements Redundant to Regulations

TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
3.4.7 PCS Loops - MODE 5, Loops Filled						
3.4.7 LA.1	3.1.9.2	CTS 3.1.9.2 contains details associated with SDC train Operability. ITS 3.4.7 does not contain details associated with SDC train Operability because they do not meet the 10 CFR 50.36 criteria and are contained in the ITS 3.4.7 Bases where they are controlled by ITS 5.5.12. This is a less restrictive-removal of details change, consistent with the STS.	Bases B3.4.7	ITS 5.5.12	Relocation of details.	1
3.4.8 PCS Loops - MODE 5, Loops Not Filled						
3.4.8 LA.1	3.1.9.3	CTS 3.1.9.3 contains details associated with SDC train Operability. ITS 3.4.8 does not contain these details because they are not necessary to describe regulatory requirements. The details are moved to the Bases for ITS 3.4.8 where they will be controlled by ITS 5.5.12.	Bases B3.4.8	ITS 5.5.12	Relocation of details.	1

Types of Changes:

1. Details of System Design and System Description Including Design Limits
2. Descriptions of Systems Operation
3. Procedural Details for Meeting TS Requirements & Related Reporting
4. Relocation of TS Administrative Requirements Redundant to Regulations

TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
3.4.10 Pressurizer Safety Valves						
3.4.10 LA.1	3.1.7.1 Table 3.1.7-1 footnote	The proposed change restates CTS 3.1.7.1 Table 3.1.7-1 footnote to omit the phrase "valve maintenance which could affect the setting." Plant procedures provide the appropriate administrative controls to ensure post-maintenance activities do not result in unintentional inoperability of required components. Placing this detail in plant procedures is acceptable because it is not necessary to adequately describe the regulatory requirement and maintaining this information in plant procedures will not result in a significant impact on safety.	Plant Procedures	Administrative Process	Relocation of details regarding valve maintenance.	3
3.4.14 PCS Pressure Isolation Valve (PIV) Leakage						
3.4.14 LA.1	3.3.3 4.3h	The proposed change removes the CTS 3.3.3 and 4.3h requirement for a test of the PIVs prior to returning the valves to service "...after maintenance, repair or replacement," because these activities are covered by the definition of Operability. Placing these details in plant procedures is acceptable because they are not necessary to adequately describe the actual regulatory requirement and maintaining this information in plant procedures will not result in a significant impact on safety. Plant procedure will be controlled in accordance with administrative process for procedure revisions.	Plant Procedures	Administrative Process	Relocation of details.	3

Types of Changes:

1. Details of System Design and System Description Including Design Limits
2. Descriptions of Systems Operation
3. Procedural Details for Meeting TS Requirements & Related Reporting
4. Relocation of TS Administrative Requirements Redundant to Regulations

TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
3.4.14 LA.2	3.3.3 4.3 Table 4.3.1	The proposed change removes the CTS Table 4.3.1, "Primary Coolant System Pressure Isolation Valves" which relates to the requirement for PIV leakage. The information in this table is moved to the FSAR, which will not result in a significant impact on safety. Changes to the FSAR will be evaluated using the criteria established in 10 CFR 50.59.	FSAR	10 CFR 50.59	Relocation of details meeting Generic Letter 91-08, "Removal of Component Lists from Technical Specifications" Criteria	1
3.4.14 LA.3	Table 4.3.1 Notes 1,2,4 and 5	CTS Table 4.3.1 contains a listing of "Primary Coolant System Pressure Isolation Valves" which relate to the requirements for PIV leakage, and is modified by five notes. The ITS Notes 1, 2, 4, and 5 have been moved to the Bases because they do not contain information pertinent to the performance of, or are necessary to establish compliance with the surveillance requirement. These details are not necessary to adequately describe actual regulatory requirements; therefore, they can be moved to a license controlled document without a significant impact on safety.	B3.4.14	ITS 5.5.12	Relocation of details regarding PIV leakage.	1

Types of Changes:

1. Details of System Design and System Description Including Design Limits
2. Descriptions of Systems Operation
3. Procedural Details for Meeting TS Requirements & Related Reporting
4. Relocation of TS Administrative Requirements Redundant to Regulations

TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
3.4.14 LA.4	4.3 footnote	CTS 4.3 footnote a (referenced in 4.3h) allows the required periodic leakage testing to be performed by indirect measurement (pressure indicators) if supported by computation for ALARA requirements. ITS 3.4.14 does not contain this same statement. This is acceptable because this information merely discusses an acceptable method of compliance with the LCO and is not necessary to describe the regulatory requirements.	Plant Procedures	Administrative Process	Relocation of details regarding indirect measurement of leakage.	3
3.4.14 LA.5	Table 4.17.6 Item 17	CTS Table 4.17.6 item 17 requires a Channel Functional Test and a Channel Calibration of the SDC Suction Interlocks every 18 months. ITS 3.4.14 does not contain a similar requirement because the SDC Suction Interlock instruments do not initiate an automatic safety function. Placing these requirements in the ORM is acceptable because changes to the ORM will be evaluated using the criteria established in 10 CFR 50.59.	ORM	10 CFR 50.59	Relocation of details regarding SDC Suction interlocks.	1

Types of Changes:

1. Details of System Design and System Description Including Design Limits
2. Descriptions of Systems Operation
3. Procedural Details for Meeting TS Requirements & Related Reporting
4. Relocation of TS Administrative Requirements Redundant to Regulations

TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
3.4.14 LA.6	4.3j	CTS 4.3j lists the check valves in the LPSI system which are used for shutdown cooling by their equipment identification. ITS SR 3.4.14.3 does not include the equipment identification. This is acceptable because the information is not necessary to describe the regulatory requirement. Placing these details in the Bases provides adequate assurance that they will be maintained because the Bases are controlled by ITS 5.5.12.	B3.4.14	ITS 5.5.12	Relocation of details regarding equipment nomenclature.	1
3.4.14 LA.7	4.3g	CTS 4.3g requires a surveillance program to monitor radiation induced changes in the reactor vessel materials. In the ITS, this requirement has been omitted because it is redundant to existing regulations. This is acceptable because these requirements are included in Appendices G and H to 10 CFR Part 50.	10 CFR 50.60	NRC Approved Methodologies	Relocation of details regarding radiation induced changes in reactor vessel.	4

Types of Changes:

1. Details of System Design and System Description Including Design Limits
2. Descriptions of Systems Operation
3. Procedural Details for Meeting TS Requirements & Related Reporting
4. Relocation of TS Administrative Requirements Redundant to Regulations

TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
3.4.16 PCS Specific Activity						
3.4.16 LA.1	3.1.4e	CTS 3.1.4e requires that a special report be prepared and submitted to the Director of the appropriate Regional Office within thirty days whenever the specific activity of the primary coolant exceeds its specified limits. ITS 3.4.16 does not require the issuance of a special report. This is acceptable per guidance provided in GL 85-19. This information has been moved to the Offsite Dose Calculation Manual (ODCM) because these details are not pertinent to the requirement for primary coolant radioactivity, but simply outline the contents of the report.	ODCM	10 CFR 50.59	Relocation of details regarding 30-day Special Report.	3
3.4.16 LA.2	Table 4.2.1 Item 1 Table 4.2.1 footnote 1	CTS Table 4.2.1 requires a test for "Gross Gamma by Fission Product Monitor." ITS 3.4.16 does not require this test. The sampling requirement associated with the fission product monitor have been placed in the ORM. Placing this information in the ORM is acceptable because changes to it will be evaluated using the criteria established in 10 CFR 50.59.	ORM	10 CFR 50.59	Relocation of details regarding Gross Gamma by Fission Product Monitor test.	3

Types of Changes:

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4. Relocation of TS Administrative Requirements Redundant to Regulations

TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
3.5 EMERGENCY CORE COOLING SYSTEM (ECCS) 3.5.2 ECCS Operating						
3.5.2 ECCS Operating						
3.5.2 LA.1	3.3.1 3.3.4	CTS 3.3.1c, d, e, f, and g, and CTS 3.3.4 contain details of the components associated with the ECCS which must be Operable. In the ITS, LCO 3.5.2 requires that "Two ECCS trains shall be Operable." The details of what constitutes an Operable ECCS train are specified in the Bases. As such, the ECCS requirements in the ITS are equivalent to the ECCS requirements in the CTS. Moving the details of the ECCS specified in CTS and placing them in the Bases of the ITS is acceptable since these details are not pertinent to the actual requirements and placing the information into the Bases provides adequate assurance that they will be maintained since the Bases are controlled by the Bases Control Program in ITS Chapter 5.0. This change is consistent with STS.	B 3.5.2	ITS 5.5.12	Relocation of details of what constitutes an operable ECCS train.	2

Types of Changes:

1. Details of System Design and System Description Including Design Limits
2. Descriptios of Systems operation
3. Procedural Details for Meeting TS Requirements & Realted Reporting Problems
4. Relocation of TS administrative requirements redundant to regulation
5. Surveillance Requirements for Indication-only Instrumentation

TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
SPECIFICATION 3.5.4 - REFUELING WATER STORAGE TANK						
3.5.4 LA.1	4.17	CTS 4.17, Table 4.17.6 item 3 specifies the requirement to perform a Channel Check and Channel Calibration on the SIRW Tank temperature instrumentation. Although SIRW Tank temperature is assumed in the plant safety analysis, the instrumentation associated with this parameter is not credited in the analysis since it does not provide a mitigative or protective function. As such, the method for determining SIRW Tank temperatures can be located outside of the technical specifications without a significant impact on safety. Therefore, the CTS 4.17 requirement to perform a Channel Check and Channel Calibration on the SIRW Tank temperature instrumentation is being moved to the Operating Requirements Manual. This change is consistent with the removal of similar type instruments from the STS.	ORM	50.59	Relocation of details for determining SIRW Tank water temperature.	5

Types of Changes:

1. Details of System Design and System Description Including Design Limits
2. Descriptios of Systems operation
3. Procedural Details for Meeting TS Requirements & Realted Reporting Problems
4. Relocation of TS administrative requirements redundant to regulation
5. Surveillance Requirements for Indication-only Instrumentation

TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
SECTION 3.6.1 Containment						
3.6.1 LA.1	1.0	In CTS 1.0, the definition of Containment Integrity addresses, in part, the status of: a) all nonautomatic containment isolation valves and blind flanges, b) the equipment hatch, c) containment air lock doors, and d) all automatic containment isolation valves. In ITS 3.6.1 the Bases describes an Operable containment and includes all automatic and nonautomatic containment isolation valves, blind flanges, air locks, and the equipment hatch. Since the details of what constitutes containment integrity are adequately described in the Bases of ITS 3.6.1, a separate definition is no longer required.	BASES 3.6.1	ITS 5.5.12	Relocation of details describing containment integrity.	1
3.6.1 LA.2	4.5.2d	CTS 4.5.2d specifies the test frequency for individual penetrations and containment isolation valves. In the ITS, Type B and C containment leak rate testing is required by SR 3.6.1.3. The Frequency for SR 3.6.1.3 is "in accordance with 10 CFR 50, Appendix J, Option A, as modified by approved exemptions." Since the testing frequencies of CTS 4.5.2d are equivalent to the testing frequencies in 10 CFR 50, Appendix J, Option A, these details can be deleted from CTS 4.5.2d without any affects on public health and safety. This change is consistent with the STS.	SR 3.6.1.3	N/A	Removal of requirements redundant to regulations.	4

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TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
3.6.1 LA.3	4.5.2a(3)	CTS 4.5.2a(3) specifies acceptable methods of local leak rate testing. These acceptable methods of testing are contained in the FSAR and are not required to be included in the ITS. Changes to the FSAR are made in accordance with the provisions of 10 CFR 50.59.	FSAR 5.8.8.2.2	10 CFR 50.59	Removal of details contained in the FSAR.	3
3.6.1 LA.4	4.5.2a(4)	CTS 4.5.2a.(4) parts (a) through (e) specifies the components which are required to have a local leak rate measured. Part (b) specifies in part that the air lock door seals are tested. This becomes part of SR 3.6.2.1. The remaining information is considered to be details which are addressed in the FSAR. Changes to the FSAR are made in accordance with the provisions of 10 CFR 50.59.	FSAR 5.8.8.2.2	10 CFR 50.59	Removal of details contained in the FSAR.	3
SECTION 3.6.2, Containment Air Locks						
3.6.2 LA.1	4.5.2a(3)	CTS 4.5.2a(3) specifies acceptable methods of local leak rate testing. These acceptable methods of testing are contained in the FSAR and are not required to be included in the ITS. Changes to the FSAR are made in accordance with the provisions of 10 CFR 50.59.	FSAR 5.8.8.2.2	10 CFR 50.59	Removal of details contained in the FSAR.	3

Types of Changes:

1. Details of System Design and System Description Including Design Limits
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4. Relocation of TS administrative requirements redundant to regulations

TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
3.6.2 LA.2	4.5.2d.(1)(b)	CTS 4.5.2d.(1)(b) specifies the testing frequencies for the containment air lock penetrations. ITS SR 3.2.6.1 required the performance of testing "in accordance with 10 CFR 50, Appendix J, Option A, as modified by approved exemptions." Since the testing frequencies of CTS 4.5.2d(1)(b) are equivalent to the testing frequencies in 10 CFR 50, Appendix J, Option A, these details can be deleted from CTS 4.5.2d(1)(b) without any affects on public health and safety.	SR 3.2.6.1	N/A	Removal of requirements redundant to regulations.	4
SECTION 3.6.3, Containment Isolation Valves						
3.6.3 LA.1	1.0	In CTS 1.0, Containment Integrity is defined in parts (a) through (e). Parts (a) and (d) are related to containment isolation valves and effectively require the containment isolation valves be OPERABLE. ITS LCO 3.6.3, requires the containment isolation valves to be OPERABLE. The Bases discusses the different types of containment isolation valves and their associated requirements. Therefore, the additional details can be deleted from the CTS.	Bases 3.6.3	ITS 5.5.12	Removal of details describing CIV Operability.	1

Types of Changes:

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TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
SECTION 3.6.6, Containment Cooling Systems						
3.6.6 LA.1 (BYS)	3.4.1a 3.4.1c	CTS 3.4.1a and b, and CTS 3.4.1c list the components of the containment cooling trains required to be OPERABLE. In ITS 3.6.6, the information regarding what comprises a train of containment cooling is addressed in the Bases. Changes to the Bases are made under licensee control in accordance with the Bases Change Control Program. This change is encompassed by a Beyond Scope issue which is discussed in Section III, G of this Safety Evaluation.	Bases 3.6.6	ITS 5.5.12	Removal of details describing the containment cooling system.	1
3.6.6 LA.2 OPEN	N/A	Being evaluated.	N/A	N/A	N/A	N/A
3.6.6 LA.4	4.6.4d	CTS 4.6.4d specifies that "each containment spray manual control valve be verified OPERABLE at least once each refueling by cycling each valve from the control room while observing valve operation at least each 18 months. Cycling containment spray valves by manual control are testing requirements addressed by the Inservice Testing Program. The Inservice Testing Program is required by 10 CFR 50.55a.	Inservice Testing Program	10 CFR 50.55a	Removes valve testing requirements that are redundant to regulations	4

Types of Changes:

1. Details of System Design and System Description Including Design Limits
2. Descriptions of Systems Operation
3. Procedural Details for Meeting TS Requirements & Related Reporting
4. Relocation of TS administrative requirements redundant to regulations

TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
SECTION 3.6.7, Hydrogen Recombiners						
3.6.7 LA.1	Table 4.2-2 item 11.a	CTS Table 4.2-2 Item 11.a specifies the acceptance criteria for the hydrogen recombiner functional test. In the ITS, this same information will be contained in the Bases of SR 3.6.7.1. Changes to the Bases are made in accordance with the Bases Change Control Program.	Bases 3.6.7	ITS 5.5.12	Removes details associated with testing requirement.	1
3.6.7 LA.3	Table 4.2-2 item b.3	CTS Table 4.2-2 Item b.3 specifies the acceptance criteria for the hydrogen recombiner electrical circuit integrity check. This acceptance criteria is included in the Bases of ITS SR 3.6.7.3. Changes to the Bases are made in accordance with the Bases Change Control Program.	Bases 3.6.7	ITS 5.5.12	Removes details associated with testing requirement.	1
3.6.7 LA.5	3.6.4	CTS 3.6.4 requires two independent containment hydrogen recombiners to be OPERABLE. Descriptive information about the design of the system is included in the Bases of ITS 3.6.7. Changes to the Bases are made in accordance with the Bases Change Control Program.	Bases 3.6.7	ITS 5.5.12	Removes details describing system Operability.	1

Types of Changes:

1. Details of System Design and System Description Including Design Limits
2. Descriptions of Systems Operation
3. Procedural Details for Meeting TS Requirements & Related Reporting
4. Relocation of TS administrative requirements redundant to regulations

TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
3.7.5 Auxiliary Feedwater (AFW) System						
3.7.5 LA.1	3.5.1c&d	CTS 3.5.1c and d contain details of the components associated with the AFW System which must be Operable. Generally, the CTS lists applicable piping, valves, flow paths, and interlocks associated with these components which are required to function during accident conditions. ITS LCO 3.7.5 requires that "Two AFW trains shall be Operable." The details of what constitutes an Operable AFW train are specified in the ITS Bases which is controlled by the Bases Control Program in ITS Chapter 5.0. This change is consistent with STS..	3.7.5 Bases	ITS 5.5.12	Removal of details of what is included in a AFW train.	2
3.7.5 LA.2	4.9.a.1 4.9.a.2	CTS 4.9.a.1 and 2 require the starting of the AFW pumps from three different locations in a three month period. ITS 3.7.5 does not include the locations where the AFW pumps are to be started since this is not an assumption of the safety analysis. The locations where the AFW pumps are to be started is determined by the Palisades Fire Protection Program which is controlled by the Palisades Administrative Control process. This change maintains consistency with STS.	Palisades Fire Protection Program	10CFR50.48	Relocation of CTS requirements redundant to regulations	4

Types of Changes:

1. Details of System Design and System Description Including Design Limits
2. Descriptions of Systems Operation
3. Procedural Details for Meeting TS Requirements & Related Reporting
4. Relocation of TS Administrative Requirements Redundant to Regulations

TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
3.7.6 Condensate Storage and Supply						
3.7.6 LA.1	3.5.2c&d	CTS 3.5.2c and d contain details of requirements for the backup water supplies to the AFW System. ITS 3.7.6 does not contain these details for backup water supplies to the AFW system. This change is acceptable because a Design Basis Accident (DBA) is not postulated to occur coincident with natural phenomena (e.g., tornado). The backup supplies are credited as the tornado-proof supply of water should a tornado strike the plant. Therefore, consistent with STS, these details have been moved to the ORM.	ORM	10CFR50.59	Details of system description.	1
3.7.6 LA.2	3.5.1a	CTS 3.5.1a has a requirement for one Fire Protection pump to be Operable as a backup supply for the AFW system. ITS 3.7.6 does not contain this requirement. This is acceptable since STS do not include a specific requirement for backup supplies other than to verify that they are available. The details of the CTS 3.5.1a requirement have been moved to the FSAR. This change is consistent with STS.	FSAR	10CRF50.59	Removed detail for a backup system.	1

Types of Changes:

1. Details of System Design and System Description Including Design Limits
2. Descriptions of Systems Operation
3. Procedural Details for Meeting TS Requirements & Related Reporting
4. Relocation of TS Administrative Requirements Redundant to Regulations

TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
3.7.7 Component Cooling Water (CCW) System						
3.7.7 LA.1	3.3.1e&g 3.4.1c	CTS 3.3.1e and g, and CTS 3.4.1c contain details of the components associated with the CCW which must be OPERABLE. ITS LCO 3.7.7 requires that Two CCW trains shall be Operable, but does not contain the details. The details of what constitute an OPERABLE CCW train are specified in the ITS Bases. Moving the details of the CCW system to the ITS Bases is acceptable since these details are not pertinent to the actual requirements. Placing these details in the Bases provides adequate assurance that they will be maintained since the Bases are controlled by the Bases Control Program. This change is consistent with STS.	3.7.7 Bases	ITS 5.5.12	Removal of details	1

Types of Changes:

1. Details of System Design and System Description Including Design Limits
2. Descriptions of Systems Operation
3. Procedural Details for Meeting TS Requirements & Related Reporting
4. Relocation of TS Administrative Requirements Redundant to Regulations

TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
3.7.8 Service Water System (SWS)						
3.7.8 LA.1	3.4.1c	CTS 3.4.1c contains details of the components associated with the SWS which must be Operable. ITS 3.7.8 requires two SWS trains to be Operable." The details of what constitutes an Operable SWS train are specified in the Bases. Removing the details of the SWS from the CTS and placing them in the Bases of the ITS is acceptable since these details are not pertinent to the actual requirements and provides adequate assurance that they will be maintained since the Bases are controlled by the Bases Control Program. This change is consistent with STS.	3.7.8 Bases	ITS 5.5.12	Details of SWS system components required to be Operable.	1

Types of Changes:

1. Details of System Design and System Description Including Design Limits
2. Descriptions of Systems Operation
3. Procedural Details for Meeting TS Requirements & Related Reporting
4. Relocation of TS Administrative Requirements Redundant to Regulations

TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
3.7.12 Fuel Handling Area Ventilation System						
3.7.12 LA.1	3.8.4	CTS 3.8.4 states if both (Fuel Handling Area Ventilation exhaust) fans are unavailable, then "any fuel movements in progress shall be completed...". The intent of this detail is to clarify that the actions do not preclude the movement of a fuel assembly to a safe position. ITS 3.7.12 does not provide this clarifying detail since it is provided in the Bases. Placing this information in the Bases is acceptable since these details are not pertinent to the requirements, and the Bases are controlled by the Bases Control Program. This change is consistent with STS.	3.7.12 Bases	ITS 5.5.12	Removal of detail.	3
3.7.16 Spent Fuel Assembly Storage						
3.7.16 LA.1	5.4.2	CTS 5.4.2 illustrates Region I and Region II of the spent fuel storage pool and spare (north) tilt pit in CTS Figure 5.4-1. This Figure is provided in the ITS 3.7.16 Bases. This is acceptable because placing these details in the Bases provides adequate assurance that they will be maintained since the Bases are controlled by the Bases Control Program. This change is consistent with STS..	3.7.16 Bases	ITS 5.5.12	Removal of detail.	1

Types of Changes:

1. Details of System Design and System Description Including Design Limits
2. Descriptions of Systems Operation
3. Procedural Details for Meeting TS Requirements & Related Reporting
4. Relocation of TS Administrative Requirements Redundant to Regulations

TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
3.8 ELECTRICAL POWER SYSTEMS 3.8.1 AC SOURCES - OPERATING						
3.8.1 LA.1	3.7.1F	CTS Action 3.7.1.F requirement for inoperable automatic DG load sequencers to immediately, result in considering the associated DG inoperable, is relocated to the Bases for ITS LCO 3.8.1.	Bases B3.8.1	ITS 5.5.12	Relocation of details does not meet 10 CFR 50.36 criteria.	3
3.8.1 LA.2	4.7.1	The CTS 4.7.1 statement, "Credit may be taken for unplanned events..." is not included in ITS 3.8.1, because this fundamental allowance is implicitly stated in the ITS Bases for SR 3.0.1.	Bases B3.0.1	ITS 5.5.12	Relocation of details does not meet 10 CFR 50.36 criteria.	3
3.8.2 AC SOURCES - SHUTDOWN						
3.8.2 LA.1	3.7.2.C	CTS Action 3.7.2.C requirement for inoperable automatic DG load sequencers to immediately, result in considering the associated DG inoperable, is relocated to the Bases for ITS LCO 3.8.2.	Bases B3.8.2	ITS 5.5.12	Relocation of details does not meet 10 CFR 50.36 criteria.	3
3.8.2 LA.2	4.7.2.1	The CTS 4.7.2.1 statement, "Credit may be taken for unplanned events..." is not included in ITS 3.8.2 because this fundamental allowance is implicitly stated in the ITS Bases for SR 3.0.1.	Bases B3.0.1	ITS 5.5.12	Relocation of details does not meet 10 CFR 50.36 criteria.	3

Types of Changes:

1. Details of System Design and System Description Including Design Limits
2. Descriptions of Systems Operation
3. Procedural Details for Meeting TS Requirements & Related Reporting
4. Relocation of TS administrative requirements redundant to regulations

TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
3.8.4 DC SOURCES - OPERATING						
3.8.4 LA.1	3.7.4 4.7.4.6	The CTS 3.7.4 and 4.7.4.6 details of specific components that comprise the required DC electrical power trains, are relocated to the Bases of ITS 3.8.4 and the FSAR and form a foundation of ITS LCO 3.8.4.	B3.8.4 FSAR	ITS 5.5.12 10 CFR 50.59	Relocation of descriptive details does not meet 10 CFR 50.36 criteria.	1
3.8.7 INVERTERS - OPERATING						
3.8.7 LA.1	3.7.7	The CTS 3.7.7 details of plant-specific equipment designators that comprise the required Preferred AC Inverters are relocated to the Bases of ITS 3.8.4 and the FSAR and form a foundation for ITS LCO 3.8.7.	B3.8.7 FSAR	ITS 5.5.12 10 CFR 50.59	Relocation of descriptive details does not meet 10 CFR 50.36 criteria.	1

Types of Changes:

1. Details of System Design and System Description Including Design Limits
2. Descriptions of Systems Operation
3. Procedural Details for Meeting TS Requirements & Related Reporting
4. Relocation of TS administrative requirements redundant to regulations

TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
3.8.9 DISTRIBUTION SYSTEMS - OPERATING						3.8.9 LA.1
3.8.9 LA.1	3.7.9 Table 3.7.9-1	CTS 3.7.9 and Table 3.7.9-1 details of plant-specific equipment designators that comprise the required AC, DC and Preferred AC distribution subsystems are relocated to the Bases of ITS 3.8.9 and the FSAR, and form a foundation of ITS LCO 3.8.9.	B3.8.9 FSAR	ITS 5.5.12 10 CFR 50.59	Relocation of descriptive details does not meet 10 CFR 50.36 criteria.	1

Types of Changes:

1. Details of System Design and System Description Including Design Limits
2. Descriptions of Systems Operation
3. Procedural Details for Meeting TS Requirements & Related Reporting
4. Relocation of TS administrative requirements redundant to regulations

TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
3.9.2 NUCLEAR INSTRUMENTATION						
3.9.2 LA.1	3.8.1e	CTS 3.8.1e contains specific details of requirements for indication of the source range monitors for continuous visual indication in the control room. These details are addressed by the definition of OPERABILITY and are not directly pertinent to the actual requirement, i.e., Limiting Condition for Operation.	Bases	ITS 5.5.12	Procedural details for meeting TS requirements and related reporting problems.	3
3.9.4 SHUTDOWN COOLING (SDC) AND COOLANT CIRCULATION - HIGH WATER LEVEL						
3.9.4 LA.1	3.1.9.3	CTS 3.1.9.3 SDC train Operability details have been relocated to Bases 3.9.4. The CTS states that an Operable SDC train consists of "an Operable SDC pump and an Operable SDC heat flow path to Lake Michigan." In the ITS, the details of what constitutes an Operable SDC train are contained in the Bases.	Bases	ITS 5.5.12	Relocation of descriptive details describing OPERABILITY.	1
3.9.4 LA.3	3.8.1f	CTS 3.8.1f specifies, that one (SDC) heat exchanger shall be in operation. ITS 3.9.4 specifies that one SDC train shall be Operable and in operation. In the ITS, the details of what constitutes an Operable SDC train are contained in the Bases. The reference to the heat exchangers in CTS 3.8.1f has been relocated to the Bases.	Bases	ITS 5.5.12	Relocation of descriptive details describing OPERABILITY.	1

Types of Changes:

1. Details of System Design and System Description Including Design Limits
2. Descriptions of Systems Operation
3. Procedural Details for Meeting TS Requirements & Related Reporting
4. Relocation of TS administrative requirements redundant to regulations

TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
3.9.5 SHUTDOWN COOLING (SDC) AND COOLANT CIRCULATION - LOW WATER LEVEL						
3.9.5 LA.1	3.1.9.3	The CTS 3.1.9.3 details associated with SDC train Operability have been relocated to the Bases of ITS 3.9.5. The CTS states that an Operable SDC train consists of "an Operable SDC pump and an Operable SDC heat flow path to Lake Michigan." In the ITS, the details of what constitutes an Operable SDC train are contained in the Bases.	Bases	ITS 5.5.12	Relocation of descriptive details describing OPERABILITY.	1

Types of Changes:

1. Details of System Design and System Description Including Design Limits
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4. Relocation of TS administrative requirements redundant to regulations

TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
4.0 DESIGN FEATURES						
4.0 LA.1	5.1	The CTS 5.1 specific description of acreage and Figure 5-1, showing a plot of that acreage, are relocated to the FSAR.	FSAR	10 CFR 50.59	Relocation of descriptive information does not meet 10 CFR 50.36 criteria.	3
4.0 LA.2	5.2.1 5.2.2 5.2.3	CTS Sections 5.2.1, Containment Structure; 5.2.2, Penetrations; and 5.2.3, Containment Structure Cooling Systems are not included in the ITS because they are addressed in the FSAR.	FSAR	10 CFR 50.59	Relocation of descriptive information does not meet 10 CFR 50.36 criteria.	1
4.0 LA.3	5.3.1	CTS Section 5.3.1, Primary Coolant System Design Pressure and Temperature, is not included in the ITS because it does not meet 10 CFR 50.36(c)(4) criteria and is contained in the FSAR.	FSAR	10 CFR 50.59	Relocation of descriptive information does not meet 10 CFR 50.36 criteria.	1
4.0 LA.4	5.3.2a 5.3.2c 5.3.2d	CTS 5.3.2, Reactor Core and Control, parts "a," "c," and "d" descriptive information is not included in the ITS because it does not meet 10 CFR 50.36(c)(4) criteria and is contained in the FSAR.	FSAR	10 CFR 50.59	Relocation of descriptive information does not meet 10 CFR 50.36 criteria.	1
4.0 LA.5	5.3.2b	The CTS 5.3.2b discussion of the number of fuel rods and the "sintered" UO2 "pellets," are not included in the ITS .because they do not meet 10 CFR 50.36(c)(4) criteria and are contained in the FSAR.	FSAR	10 CFR 50.59	Relocation of descriptive information does not meet 10 CFR 50.36 criteria.	1

Types of Changes:

1. Details of System Design and System Description Including Design Limits
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TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
4.0 LA.6	5.3.3	The CTS 5.3.3, Emergency Core Cooling System, descriptive information is not included in the ITS because it does not meet 10 CFR 50.36(c)(4) criteria and is contained in the FSAR.	FSAR	10 CFR 50.59	Relocation of descriptive information does not meet 10 CFR 50.36 criteria.	1
4.0 LA.7	5.4.1b	CTS 5.4.1b states that, "New fuel may also be stored in shipping containers." This statement is not relevant to the discussion of the new fuel storage racks. Therefore, it is not included in the ITS.	ORM	10 CFR 50.59	Relocation of descriptive information does not meet 10 CFR 50.36 criteria.	3
4.0 LA.8	5.4.1c	CTS 5.4.1c states that, "The new fuel storage racks are designed as a Class 1 structure." This statement is not included in the ITS because it is contained in the FSAR.	FSAR	10 CFR 50.59	Relocation of information does not meet 10 CFR 50.36 criteria.	1
4.0 LA.9	5.4.2a	CTS 5.4.2a states that, "Irradiated fuel bundles will be stored, prior to off-site shipment in the stainless steel-lined spent fuel pool." This statement is not included in the ITS because it is contained in refueling and fuel handling procedures which are controlled by 10 CFR 50.59.	ORM	10 CFR 50.59	Relocation of information does not meeti10 CFR 50.36 criteria.	1
4.0 LA.10	5.4.2g	CTS 5.4.2g states that, "The spent fuel racks are designed as a Class 1 structure." This statement is not included in the ITS because it is contained in the FSAR.	FSAR	10 CFR 50.59	Relocation of information does non meet 10 CFR 50.36 criteria.	1

Types of Changes:

1. Details of System Design and System Description Including Design Limits
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TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
4.0 LA.11	5.4.2 NOTE	The NOTE in CTS 5.4.2 states that, "Until needed for fuel storage, one Region II rack in the northeast corner of the spent fuel pool may be removed and replaced with the cask anti-tipping device." This statement is not included in the ITS because it is contained in the FSAR.	FSAR	10 CFR 50.59	Relocation of information does not meet 10 CFR 50.36 criteria.	1
4.0 LA.12	Fig. 5.4-1	The CTS Figure 5.4-1, graphical representation of the spent fuel arrangement, is relocated to ITS Bases 3.7.16, Spent Fuel Storage.	Bases	ITS 5.5.12	Relocation of information does not meet 10 CFR 50.36 criteria.	1

Types of Changes:

1. Details of System Design and System Description Including Design Limits
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TABLE LA - LESS RESTRICTIVE - ADMINISTRATIVE DETAILS MATRIX (DRAFT)

ITS & DOC REFERENCE	CTS REFERENCE	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION	CHANGE TYPE
5.0 ADMINISTRATIVE CONTROLS						
5.0 LA.1	4.5.4 4.5.5	CTS 4.5.4, "Surveillance for Prestressing System" and CTS 4.5.5, "End Anchorage Concrete Surveillance" specifications are replaced by ITS 5.5.5, "Containment Structural Integrity Surveillance Program." This is acceptable because testing of containment tendons in accordance with ASME Boiler and Pressure Vessel Code, Section XI, Subsections IWE and IWL is specified in 10 CFR 50.55a. This change eliminates duplication of federal regulations and can be made without an impact on public health and safety.	ITS 5.5.5	10 CFR 50.55a	Does not meet 10 CFR 50.36 criteria	4
5.0 LA.2	6.5.7	The CTS 6.5.7 phrase,"including applicable supports" has been deleted from the CTS because it duplicates requirements in the CFRs. As used in CTS 6.5.7, "applicable supports" is intended to apply to the inspection of snubbers. Deletion of this CTS phrase is acceptable because inspection of applicable supports continues to be required by 10 CFR 50.55a(g).	CFRs	10 CFR 50.55a(g)	Does not meet 10 CFR 50.36 criteria	4

Types of Changes:

1. Details of System Design and System Description Including Design Limits
2. Descriptions of Systems Operation
3. Procedural Details for Meeting TS Requirements & Related Reporting
4. Relocation of TS administrative requirements redundant to regulations

TABLE R - RELOCATED SPECIFICATIONS MATRIX (DRAFT)

DOC	CTS SECTION	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION
3.2 POWER DISTRIBUTION LIMITS					
3.2 R.1	3.11.1 4.18.1 3.11.2 3.17.6.15 3.17.6.16 Action 3.17.6.21 Action T3.17.6 Items 15 & 16 T4.17.6 Items 15 &16 4.18..2.1a 4.18.2.1c	The CTS Sections provide incore and excore monitoring system instrumentation requirements related to Power Distribution Limits monitoring functions. Either of these two core power distribution monitoring systems provides monitoring of the core power distribution parameters, but neither of these systems meet the criteria set forth in 10 CFR 50.36(c)(2)(ii) for inclusion in the TS. Therefore, the incore and excore monitoring systems (as related to Power Distribution Limit monitoring) have been relocated out of the CTS and placed in the Operating Requirements Manual (ORM).	ORM	50.59	Does not meet 10CFR50.36 criteria.

TABLE R - RELOCATED SPECIFICATIONS MATRIX (DRAFT)

DOC	CTS SECTION	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION
3.4 R.1	3.1.2b	CTS 3.1.2b specifies that the pressurizer heatup rate shall be maintained ≤ 100°F/hour and the pressurizer cooldown rate shall be maintained ≤ 200°F/hour. When shutdown cooling isolation valves MO-3015 and MO-3016 are open, pressurizer heatup rate shall be maintained ≤ 60°F/hour. These limits do not meet the criteria set forth in 10 CFR 50.36(c)(2)(ii) Criterion 2 for inclusion in the TS. The requirements associated with CTS 3.1.2b are relocated to the Operating Requirements Manual (ORM). Changes to the ORM will be evaluated using the criteria established in 10 CFR 50.59.	ORM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria.
3.4 R.2	3.1.6	The requirements for the maximum oxygen and halogen concentrations allowed in the primary coolant system, associated with CTS 3.1.6, are relocated to the ORM. These requirements do not meet the screening criteria of 10 CFR 50.36(c)(2)(ii). Changes to the ORM will be evaluated using the criteria established in 10 CFR 50.59.	ORM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria.

TABLE R - RELOCATED SPECIFICATIONS MATRIX (DRAFT)

DOC	CTS SECTION	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION
3.7.17 R.1	4.12	CTS 4.12 contains a requirement for an "Augmented Inservice Inspection Program for High Energy Lines Outside of Containment." That requirement does not meet the criteria of 10 CFR 50.36 and is being relocated to the Operating Requirements Manual (ORM). This relocation is acceptable because the ORM is part of the FSAR where it is evaluated using the criteria established in 10 CFR 50.59.	ORM	10CFR50.59	Does not meet the criteria of 10CFR50.36

TABLE R - RELOCATED SPECIFICATIONS MATRIX (DRAFT)

DOC	CTS SECTION	SUMMARY OF CHANGE	NEW LOCATION	CHANGE CONTROLS	CHARACTERIZATION
3.9 R.1	3.8.1d	Requirements associated with the spent fuel storage area radiation monitors were relocated.	ORM	10 CFR 50.59	Requirements do not meet 10 CFR 50.36 criteria.
3.9 R.2	3.8.1h	Requirements for communications between Control Room and Refueling Machine Operator were relocated.	ORM	10 CFR 50.59	Requirements do not meet 10 CFR 50.36 criteria
3.9 R.3	3.8.3	The requirement that "the initiation of refueling operations before the reactor core has decayed for a minimum of 48 hours if the reactor has been operated at power levels in excess of 2% rated power," was relocated. Although the requirement to wait 48 hours after criticality >2% power does meet 10 CFR 50.36 criteria for inclusion in the ITS, practical considerations make it impossible to initiate refueling in less than 48 hours after criticality..	ORM	10 CFR 50.59	Meets 10 CFR 50.36 criteria but is not necessary in view of practical considerations.
3.9 R.4	3.8.5 4.2.2 Table Item 6	The requirement that " when spent fuel which has decayed less than one year is placed in the tilt pit storage rack, the bulk water temperature in the tilt pit storage area must be monitored continuously to assure that the water temperature does not exceed 150°F," was relocated.	ORM	10 CFR 50.59	Requirement does not meet 10 CFR 50.36 criteria
3.9 R.5	4.2.2 Table Item 5	The requirement for a Refueling System Interlocks functional test prior to refueling operations was relocated.	ORM	10 CFR 50.59	Requirement does not meet 10 CFR 50.36 criteria

EXAMPLE LICENSE CONDITION FOR ITS IMPLEMENTATION

FACILITY OPERATING LICENSE NO. DPR-20

The following license condition should be proposed to be added to section 2.C. of the license:

(X.) Upon implementation of Amendment , the schedule for the performance of new and revised Surveillance Requirements (SRs) shall be as follows:

a. For SRs that are new in this amendment, the first performance is due at the end of the first surveillance interval that begins on the date of implementation of this amendment.

b. For SRs that existed prior to this amendment whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of this amendment.

c. For SRs that existed prior to this amendment that have modified acceptance criteria, the first performance is due at the end of the first surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment.

h. For SRs that existed prior to this amendment whose intervals of performance are being extended, the first extended surveillance interval begins upon completion of the last surveillance performed prior to implementation of this amendment.