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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO

AMENDMENT NO. 173 TO FACILITY OPERATING LICENSE NPF-35

AND AMENDMENT NO. 165 TO FACILITY OPERATING LICENSE NPF-52

CATAWBA NUCLEAR STATION, UNITS 1 AND 2

DUKE ENERGY CORPORATION, ET AL.

DOCKET NOS. 50-413 AND 50-414

AND

AMENDMENT NO. 184 TO FACILITY OPERATING LICENSE NPF-9

AND AMENDMENT NO. 166 TO FACILITY OPERATING LICENSE NPF-17

MCGUIRE NUCLEAR STATION, UNITS 1 AND 2

DUKE ENERGY CORPORATION

DOCKET NOS. 50-369 AND 50-370

1.0 INTRODUCTION

Catawba Nuclear Station (CNS), Units 1 and 2, and McGuire Nuclear Station (MNS) Units 1 and 2, have been operating with technical specifications (TS) issued with the original operating licenses on January 17, 1985, May 15, 1986, June 12, 1981, and March 3, 1983, respectively, as amended from time to time. By separate letters for each facility dated May 27, 1997, as supplemented by separate letters dated March 9, March 20, April 20, June 3, June 24, July 7, July 21, August 5, September 8, and September 15, 1998, Duke Energy Corporation (DEC or the licensee) proposed to convert the existing TS to the improved TS. The improved TS are based upon NUREG-1431, "Standard Technical Specifications for Westinghouse Plants," Revision 1, dated April 1995; 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 the requirements of 10 CFR 50.36, as amended July 19, 1995 (60 FR 36953). The overall objective of the proposed amendments, consistent with the Final Policy Statement, was to rewrite, reformat, and streamline the TS for CNS (Catawba Nuclear Station) and MNS (McGuire Nuclear Station) to be in accordance with 10 CFR 50.36, "Technical Specifications."

Hereafter, the improved TS are the ITS, the existing or current TS are the CTS, and the improved standard TS, such as in NUREG-1431, are the STS. The corresponding TS Bases

are the ITS Bases, CTS Bases, and STS Bases, respectively. For discussions applying to just one of the two facilities, the acronyms ITS and CTS are preceded by CNS or MNS, as appropriate.

In addition to basing the ITS on the STS, the Commission's Final Policy Statement, and the requirements in 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 July 10, 1998 (the meeting summaries were issued on November 26, 1997, and June 1, June 29, and July 13, 1998). Consistent with the Final Policy Statement, the licensee proposed transferring some CTS requirements to licensee-controlled documents such as the Updated Final Safety Analysis Report (UFSAR) for the CNS and MNS, for which changes by licensees to the documents are controlled by a regulation such as 10 CFR 50.59. These licensee controlled-documents may be changed without prior staff approval, whereas NRC-controlled documents, such as the TS, may not be changed by the licensee without prior staff approval. 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 actions on the CNS and MNS applications for amendments, both dated May 27, 1997, were published in the Federal Register on July 14, 1997 (62 FR 37628) for CNS, and on July 15, 1997 (62 FR 37940) for MNS. The staff's evaluation of these applications, including the supplements listed above, that resulted from NRC requests for additional information (RAIs) and discussions with the licensee during the NRC staff review, is presented in this safety evaluation (SE). The staff issued RAIs dated January 16, January 30, March 27, April 15, April 28, May 14, May 22, July 6 (for CNS) and July 7 (for MNS), 1998. The plant-specific changes contained in these supplements serve to clarify the ITS with respect to the guidance in the Final Policy Statement and STS. Therefore, these plant-specific changes are within the scope of the action described in the Federal Register notices, except for the beyond-scope changes that were the subject of separate notices. These notices were issued on May 6, 1998 (63 FR 25106); May 20, 1998 (63 FR 27760); and July 13, 1998 (63 FR 40553) for CNS, and on May 6, 1998 (63 FR 25107) and (63 FR 25108 (two separate notices)), May 20, 1998 (63 FR 27761), July 29, 1998 (63 FR 40554), and August 26, 1998 (63 FR 45524) for MNS.

Following the initial May 27, 1997, applications for operating license amendments to convert the CTS to the ITS for CNS and MNS, the NRC staff approved other amendments to the CNS and MNS operating licenses. These amendments, which DEC has incorporated as appropriate into the ITS, are the following:

Catawba Nuclear Station, Units 1 and 2

Date Issued	Amendment No. Unit 1	Amendment No. Unit 2	Description
7/21/97	160	152	Revised TS requirements for the standby shutdown system. These requirements are not retained in the ITS but are relocated to Chapter 16 of the UFSAR; see Table R, Discussion of Change 3.7 - R.6.
8/22/97	161	153	Changed licensee name from Duke Power Company to Duke Energy Corporation in operating licenses.
10/9/97	162	-	Allowance to permit natural circulation testing in Mode 3 following steam generator replacement in 1996. Not retained in the Unit 1 ITS because this allowance has expired.
11/13/97	-	154	Deletion of steam generator tube repair criteria - incorporated into Unit 2 ITS 5.5.9.
3/2/98	163	155	Revised references to core operating limits report (COLR) methodologies - incorporated into ITS 5.6.5.
4/23/98	164	156	Revised operating licenses to delete outdated license conditions and exemptions, and to correct errors.
4/27/98	165	157	Revised qualifications of Safety Review Group (SRG). Not retained in the ITS - relocated to the Quality Assurance Topical Report; see Table LA, Discussion of Change 5.0 - LA.3.
6/17/98	166	158	Revision of surveillance requirements for pressurizer heaters to be consistent with current plant design - incorporated into ITS 3.4.9.
7/9/98	167	159	Relaxed Applicability of control room area ventilation actuation instrumentation function - incorporated into ITS 3.3.7.
9/9/98 9/28/98	171	164	Deletion of ASME pressure test of diesel generator fuel oil system - incorporated in ITS 3.8.3.
8/28/98	170	162	Revised TS requirements for low temperature overpressure protection (LTOP) - incorporated into ITS 3.4.3 and 3.4.12.

Catawba Nuclear Station, Units 1 and 2

Date Issued	Amendment No. Unit 1	Amendment No. Unit 2	Description
8/25/98	169	161	Revised trip set point and allowable value for nuclear service water suction transfer on low pit level - incorporated into ITS 3.3.2 and Table 3.3.2-1.
8/25/98	168	160	Relaxed TS requirements for stored ice weight - incorporated into ITS 3.6.12.
9/10/98	172	163	Change in frequency for inspection of ice condenser lower inlet plenum support structure and turning vanes.

McGuire Nuclear Station, Units 1 and 2

Date Issued	Amendment No. Unit 1	Amendment No. Unit 2	Description
11/25/97	177	159	Revised trip set point and allowable values for the automatic switchover to recirculation RWST level - incorporated into ITS 3.3.2 and Table 3.3.2-1.
4/8/98	178	160	Revised references to COLR methodologies - incorporated into ITS 5.6.5.
7/30/98	179	161	Revised CTS Figure 5.1-1 regarding location of the meteorological tower. Not retained in ITS - see Table LA, Discussion of Change 4.0 - LA.1
9/28/98	183	165	Added allowance for 72 cumulative hours of operation with elevated temperatures in the containment lower compartment - incorporated into ITS 3.6.1.5
9/22/98	182	164	Remove references to steam line low pressure safety injection function - incorporated into ITS 3.3.2 and Table 3.3.2-1.

McGuire Nuclear Station, Units 1 and 2

Date Issued	Amendment No. Unit 1	Amendment No. Unit 2	Description
9/17/98	181	163	Revised the trip set points of the power range neutron flux high trip function in the event of inoperable main steam safety valves - incorporated into ITS 3.7.1.
9/10/98	180	162	Change in frequency for inspection of ice condenser lower inlet plenum support structure and turning vanes.

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 CNS and MNS 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 ITS based on the STS is a voluntary process. Therefore, it is acceptable that the ITS differs from the STS, reflecting the current licensing bases for CNS and MNS. The NRC staff approves the licensee's changes to the CTS with modifications documented in the supplemental submittals.

In the letters of September 8, and 15, 1998, the licensee proposed license conditions for the implementation of the ITS. Also, in these letters, the licensee submitted revised ITS pages. The license conditions and revised ITS pages do not change the scope of the original amendment requests, and therefore do not change the notices in the Federal Register on July 14, 1997 (62 FR 37628) and July 15, 1997 (62 FR 37940), for the conversion from the CTS to the ITS for CNS and MNS, respectively. In addition to these notices, there were three notices for CNS and six notices for MNS in the Federal Register for the beyond scope issues associated with the conversion, as listed previously, that are discussed in Section III.G of this SE.

For the reasons stated *infra* in this SE, the NRC staff finds that the CNS ITS and MNS ITS issued with these license amendments comply with Section 182a of the Atomic Energy Act of 1954, as amended (the 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.

2.0 BACKGROUND

Section 182a of the 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 (SRs); (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 STS, such as NUREG-1431 for Westinghouse plants, 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-1431, which was developed using the guidance and criteria contained in the Commission's Interim Policy Statement. The STS in NUREG-1431 were established as a model for developing the STS for Westinghouse plants in general. The 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-1431 provide an abundance of information regarding the extent to which the STS present requirements that are necessary to protect public health and safety. The STS in NUREG-1431 apply to CNS and MNS.

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 STS, and encouraged licensees to use the STS as the basis for plant-specific TS amendments, and for complete conversions to ITS based on the 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 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 CNS and MNS CTS to those based on STS, as modified by plant-specific changes, is consistent with the CNS and MNS current licensing bases and the requirements and guidance of the Final Policy Statement and 10 CFR 50.36.

III. EVALUATION

The NRC staff's ITS review evaluated 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 CNS and MNS requirements removed from the CTS and placed in licensee-controlled documents. The ITS review included discussion of the NRC staff's plans for monitoring the licensee's implementation of these controls at CNS and MNS.

The NRC staff review also identified the need for clarifications and additions to the amendment application in order to establish an appropriate regulatory basis for translation of CTS requirements into ITS. Each change proposed in the amendment request is identified as either a discussion of change (DOC) to the CTS or a justification for deviation from the STS. The NRC staff comments were documented as requests for additional information (RAIs) and forwarded in letters dated January 16, January 30, March 27, April 15, April 28, May 14, May 22, and July 6, 1998. The licensee provided responses in letters dated March 9, March 20, April 20, June 3, June 24, July 7, July 21, August 5, September 8, and September 15, 1998. The letters clarified and revised the licensee's basis for translating the CTS requirements into ITS. The NRC staff finds that the licensee's submittals including responses to RAIs provide sufficient detail to allow the staff to reach a conclusion regarding the adequacy of the licensee's proposed changes to the CTS.

These changes generally fall into one of five types, as reflected in Tables A, M, L, LA, and R attached to this SE. These Tables encompass the following CTS change categories:

- Administrative Changes (A), i.e., nontechnical changes in the presentation of CTS requirements;
- Technical Changes - More Restrictive (M), i.e., new or additional CTS requirements;
- Technical Changes - Less Restrictive (specific) (L), i.e., changes, deletions and relaxations of CTS requirements;

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

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

These CTS change categories are more fully described as follows:

A. Administrative Changes

Administrative (nontechnical) 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 the 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;

(6) presentation changes that involve rewording or reformatting for clarity (including moving an existing requirement to another location within the TS) but which do not involve a change in requirements;

(7) wording changes and additions that are consistent with current interpretation and practice, and that more clearly or explicitly state existing requirements; and

(8) deletion of redundant TS requirements that exist elsewhere in TS.

Table A - Administrative Changes lists the administrative changes to CTS in converting to the ITS. Table A is organized in ITS order by each A-type DOC to the CTS, and provides a

summary description of the administrative change that was made, and CTS and ITS 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 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 the STS, proposed a number of requirements more restrictive than those in the CTS. The 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 the 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 - More Restrictive Changes lists the more restrictive changes to the CTS in converting to the ITS. Table M is organized in ITS order by each M-type DOC to the CTS and provides a summary description of the more restrictive change that was adopted, and the CTS and ITS references. These changes are additional restrictions on plant operation and are acceptable because they enhance safety.

C. Technical Changes - Less Restrictive (Specific)

Less restrictive requirements include changes, deletions and relaxations to portions of the CTS 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 NRC staff positions that have evolved from technological advancements and operating experience, or (3) resolution of the Owners Groups comments on the 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 CNS and MNS designs were also reviewed to determine if the specific design bases and licensing bases for CNS and MNS are consistent with the technical basis for the model requirements in the STS, and thus provide a basis for the ITS.

A significant number of changes to the CTS involved changes, deletions and relaxations to portions of the CTS requirements evaluated in Categories I through VIII as follows:

Category I	Relaxation of Applicability
Category II	Relaxation of Surveillance Frequency
Category III	Relaxation of Completion Time
Category IV	Relaxation of Required Actions

Category V	Relaxation of Surveillance Requirement
Category VI	Relaxation of LCOs and Administrative Controls
Category VII	Deletion of Surveillance Requirements
Category VIII	Deletion of Requirements Redundant to Regulation

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

Relaxation of Applicability (Category I)

CNS and MNS CTS typically specify the Applicability of the requirements associated with an LCO in terms of reactor operational conditions, using the CTS-defined term Operational Mode, or Mode. This definition includes Mode 1 - Power Operation, Mode 2 - Startup, Mode 3 - Hot Standby, Mode 4 - Hot Shutdown, Mode 5 - Cold Shutdown, and Mode 6 - Refueling. These six Modes are defined by inclusive combinations of reactor core reactivity, power level, and average coolant temperature. CTS Applicability statements typically specify meeting the LCO requirements during one or more of these Modes; some specify all six Modes; others specify "at all times." CTS Applicabilities may also specify other plant conditions or operations such as whenever irradiated fuel is in the storage pool, during storage of fuel in the spent fuel pool, during Core Alterations, and during movement of irradiated fuel assemblies. In some cases, the CTS contain footnotes to limit the scope of a Mode of Applicability to more closely match the conditions during which the LCO is needed to support the plant safety analysis. Consistent with the STS, the ITS retain the intent of this approach which is to specify Applicabilities that are consistent with the application of the plant safety analysis assumptions for operability of the required features. For a number of ITS specifications, these revised Applicabilities are less restrictive than the Applicabilities of corresponding requirements in the CTS.

The ITS relax some CTS Applicabilities, consistent with the STS, by adding exceptions in the form of notes, to allow needed operational flexibility. Such exceptions allow performing normal operations and testing that would otherwise be prohibited during the conditions defined by the Applicability of the LCO. Such exceptions in the ITS are restricted to necessary but infrequent operations of limited duration and scope. Such allowances are acceptable because the potential impact on safety during the short time needed to accomplish the specified operation or test is small.

The ITS relax the Applicabilities of a number of CTS LCOs that apply in Mode 6 by revising the CTS definition of Core Alterations to include only those activities that can affect core reactivity. This relaxation is acceptable because the specifications applicable during Core Alterations are those that protect against or mitigate a reactivity excursion event.

CTS LCO Operability requirements for a component are not needed when the safety function of the specified safety system is met because the component is performing its intended safety function. For example, if the safety function of a valve, such as a main steam isolation valve, is to provide system isolation and the valve is closed, the safety function is met; thus the Applicability of the LCO may be revised to stipulate that the LCO does not apply to the valve if the valve is closed.

Deleting or modifying the Applicability requirements that are indeterminate or which are inconsistent with the application of accident analysis assumptions is appropriate because (1) it increases operational flexibility without adversely affecting plant safety, and (2) when LCOs and associated remedial action requirements cannot be met, the ITS will, in most cases, require exiting the Applicability, thus taking the plant out of the conditions during which the LCO must be met. Therefore, less restrictive changes falling within Category I are acceptable.

Relaxation of Surveillance Frequency (Category II)

CTS and ITS Surveillance Requirement (SR) Frequencies specify time interval requirements for performing surveillances. By increasing the time interval between performances of a surveillance, the ITS decreases equipment unavailability from testing thereby increasing 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 enhance safety because safety system unavailability from testing is reduced; in turn, reliability of the affected structure, system or component should remain constant or increase. Less frequent testing is appropriate where operating experience, industry practice, industry standards, or manufacturers' recommendations have shown that components usually pass the SR when performed at the specified interval. In such cases, therefore, relaxed SR Frequencies are acceptable because they do not reduce, but can increase system reliability.

The ITS relax some CTS SR Frequencies by eliminating the requirement to perform the surveillance "on a Staggered Test Basis." Consistent with the STS, the ITS omits CTS staggered (alternating) test requirements that have been shown by operating experience to contribute little to safety. This is beneficial because staggered testing imposes additional constraints on plant operation, scheduling, and manpower, and may also increase the time safety systems are unavailable from testing. Typically, the ITS, consistent with the STS, only specifies staggered testing for certain systems or components where this method is most practical or where it contributes to safety. Therefore, the elimination of staggered testing requirements, consistent with the guidance of the STS, is acceptable.

The ITS also relax CTS SR Frequencies by adding specific exceptions, consistent with the STS, in the form of a SR note or an addition to the Frequency itself to allow performing the surveillance at an optimum time or plant condition. Such an exception might allow entry into a specified Mode or condition in the Applicability of the associated LCO prior to performing the surveillance. Exceptions are also specified to allow delay in the performance of certain SRs for ac and dc sources during shutdown conditions when such performance would result in less than the minimum Operable LCO-required electrical power sources. Such exceptions are acceptable because the affected features usually pass the surveillance and the delay in performance is expected to be of short duration. These exceptions ensure the surveillances are performed at the correct time or plant condition to provide the desired verification of system Operability or protective limit. Therefore, the addition of these exceptions, consistent with the guidance of the STS, is acceptable.

The ITS may also base CTS SR Frequency relaxations on staff-approved topical reports. The NRC staff has accepted topical report analyses that bound the plant-specific design and component reliability assumptions.

SR Frequency relaxations in the ITS typically remove unnecessary burdens on plant operation from testing but ensure adequate verification that the associated LCO requirements are being met. Therefore, less restrictive changes falling within Category II are acceptable.

Relaxation of Completion Time (Category III)

Upon discovery of a condition in which an LCO is not met, the CTS require performing the applicable specified action requirements. These specified action requirements, or Required Actions as they are called in the ITS and STS, are remedial measures that must be completed within specified time limits. In the ITS and STS, these time limits are formally called Completion Times. Completion Times define limits during which operation in a degraded condition is permitted. The ITS retain many CTS action requirements but allow longer Completion Times, consistent with the STS. Adopting Completion Times from the STS is acceptable because they 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 repair or replacement of required features, and the low probability of a design basis accident (DBA) occurring during the repair period. Therefore, less restrictive changes falling within Category III are acceptable.

Relaxation of Required Actions (Category IV)

Upon discovery of a condition in which an LCO is not met, the CTS require performing the applicable specified action requirements. These action requirements, or Required Actions as they are called in the ITS and STS, are remedial measures that must be completed within specified time limits, or Completion Times. For some conditions, the

ITS Required Actions, consistent with the STS, are less restrictive than the corresponding CTS action requirements. Adopting Required Actions from the STS is acceptable because they 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. Category IV relaxations include deletion, revision, and replacement of CTS action requirements consistent with the STS. These relaxations have been determined not to reduce the effectiveness of the CTS action requirements or the level of safety provided by the CTS action requirements. Therefore, less restrictive changes falling within Category IV are acceptable.

Relaxation of Surveillance Requirement (Category V)

Prior to placing the plant in a specified operational mode or other condition stated in the Applicability of an LCO, and in accordance with the specified SR Frequency thereafter, the CTS require verifying the Operability of each LCO-required component by meeting the SRs associated with the LCO. This usually entails performance of testing to demonstrate the Operability of the LCO-required components, or the verification that specified parameters are within LCO limits. A successful demonstration of Operability requires meeting the specified acceptance criteria as well as any specified conditions for the conduct of the test. Relaxations of CTS SRs include relaxing both the acceptance criteria and the conditions of performance. These CTS SR relaxations are consistent with STS.

Relaxations of CTS SR acceptance criteria provide operational flexibility, consistent with the guidance of the STS, but do not reduce the level of assurance of Operability provided by the successful performance of the surveillance. Such revised acceptance criteria are acceptable because they remain consistent with the application of the plant safety analysis assumptions for Operability of the LCO-required features.

Relaxations of CTS SR performance conditions include not requiring testing of deenergized equipment (e.g., instrumentation Channel Checks) and equipment that is already performing its intended safety function (e.g., position verification of valves locked in their safety actuation position). These changes are acceptable because the existing surveillances are not necessary to ensure the capability of the affected components to perform their intended functions. Another relaxation of SR performance conditions is the allowance to verify the position of valves in high radiation areas by administrative means. This change is acceptable because the TS administrative controls (ITS 5.7) regarding access to high radiation areas make the likelihood of mispositioning such valves negligible.

Finally, the ITS permits the use of an actual as well as a simulated actuation signal to satisfy SRs for automatically actuated systems. This is acceptable because TS required features cannot distinguish between an "actual" signal and a "test" signal.

These relaxations of CTS SRs optimize test requirements for the affected safety systems and increase operational flexibility. Therefore, because of the reasons stated, less restrictive changes falling within Category V are acceptable.

Relaxation of LCOs and Administrative Controls (Category VI)

CTS contain LCOs that are overly restrictive because they specify limits on operational and system parameters and on system Operability beyond those necessary to meet safety analysis assumptions. CTS also contain administrative controls that do not contribute to the safe operation of the plant. The ITS, consistent with the guidance in the STS, omit such operational limits and administrative controls. This category of change includes (1) deletion of equipment or systems addressed by the CTS LCOs which are not required or assumed to function by the applicable safety analyses; (2) addition of explicit exceptions to the CTS LCO requirements, consistent with the guidance of the STS and normal plant operations, to provide necessary operational flexibility but without a significant safety impact; and (3) deletion of miscellaneous administrative controls such as reporting requirements—sometimes contained in action requirements—that have no affect on safety. Deletion of such administrative controls allows operators to more clearly focus on issues important to safety. The ITS LCOs and administrative controls resulting from these changes will continue to maintain an adequate degree of protection consistent with the safety analysis while providing an improved focus on issues important to safety and necessary operational flexibility without adversely affecting the safe operation of the plant. Therefore, less restrictive changes falling within Category VI are acceptable.

Deletion of Surveillance Requirements (SR) (Category VII)

The CTS contain SRs that do not contribute significantly to demonstrating the Operability of the associated LCO-required features. These SRs do not add additional assurance that such features can perform their intended safety functions. The ITS, consistent with the STS, omit most such SRs because they are unnecessary to ensure the associated LCOs are met. CTS SRs falling under this category of change include the following.

CTS SRs to verify that an LCO requirement is met within a short interval before entering the LCO's Applicability may be deleted because ITS SR 3.0.4 is adequate to ensure this verification takes place before entering the LCO's Applicability within the specified periodic SR test interval, or Frequency. Meeting the specified periodic SR Frequency is adequate to ensure the affected LCO requirement is met.

CTS SRs that verify a feature's capability not assumed in the accident analysis may be deleted because the associated LCO does not require that capability for the feature to be Operable. An example is the deletion of the 18-month Channel Calibration of the automatic actuation function of the power operated relief valves (PORVs) in Modes 1, 2, and 3.

CTS SRs that require testing prior to returning an LCO-required feature to service following corrective or preventive maintenance, and design modification may be deleted because QA requirements and plant procedures already control retest requirements following these activities on plant equipment. These controls are adequate to ensure proper verification that the Operability of plant equipment is restored, thus maintaining the level of safety provided by the associated specifications. In addition, deletion of this kind of SR precludes duplication of test requirements in the ITS, consistent with the STS.

CTS SRs for indication-only instrumentation and for equipment controls may be deleted because they are not necessary to meet the requirements of Operability for the LCO-required features. For example, the Operability of the accumulators is dependent on the quantity and concentration of borated water and the pressure of the cover gas. The method of determining the volume of the borated water and the pressure of the cover gas is not an assumption or initial condition for any safety analysis. These determinations may be accomplished effectively by the installed instrumentation or by test equipment. Another example is the deletion of the Channel Calibration for hydrogen recombiner controls.

The hydrogen recombiner control instrumentation does not relate directly to the Operability of the hydrogen recombiners. In addition, the hydrogen recombiner functional test will ensure that the necessary controls will function properly. Control of the availability of, and necessary compensatory activities if not available, for indication instruments, monitoring instruments, and alarms are already adequately addressed by plant operational procedures and policies. Therefore, deletion of CTS SRs for such instrumentation is acceptable.

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 significantly to the verification that the equipment used to meet the LCO can perform its required functions. Thus, appropriate equipment continues to be tested. Therefore, less restrictive changes falling within Category VII are acceptable.

Deletion of Requirements Redundant to Regulation (Category VIII)

CTS contain requirements that are redundant to regulations in 10 CFR. For example, many CTS reporting requirements are also required by 10 CFR 50.72 and 10 CFR 50.73. The CTS include requirements to submit Special Reports when specified limits, LCOs, or action requirements are not met. However, the ITS, consistent with the STS, omits many of the CTS reporting requirements because the reporting requirements in the regulations cited are acceptable and do not need repeating in the TS to ensure timely submission to the NRC. In addition, these redundant CTS reporting requirements are administrative in nature and do not affect plant safety. Therefore, this type of change has no impact on the safe operation of the plant. Deletion of these

requirements is beneficial because it reduces the administrative burden on the plant and fosters a better focus on operational matters important to safety. Therefore, less restrictive changes falling under Category VIII are acceptable.

Table L - Less Restrictive Changes lists the less restrictive changes to the CTS in converting to the ITS. Table L is organized in ITS order by each L-type DOC to the CTS, and provides a summary description of each less restrictive change that was made, the CTS and ITS references, and a reference to the applicable change categories as discussed above (if applicable). For ease of reference, the eight less restrictive change categories are listed at the bottom of each page of Table L.

Additionally, in electing to adopt the specifications of the STS, the licensee also proposed a number of less restrictive changes to the CTS which do not apply to the above categories of changes, deletions, and relaxations of CTS requirements. These changes are characterized as unique in Table L and are evaluated below. The evaluations for each section are preceded by the ITS section and each evaluation is labeled with the DOC identifier (e.g., L.1) associated with the change. Most of these changes to the CTS were consistent with the STS and/or the current licensing basis and, therefore, were not beyond the scope of the ITS conversion. Those unique changes that were beyond the scope of the conversion are addressed in Section III.G of this SE.

ITS Section 3.2, Power Distribution Limits

L.5 CTS 4.2.1.1.a.2 requires monitoring axial flux difference (AFD) once per hour for 24 hours after restoring the AFD alarm to operable status. CTS 4.2.1.1.b requires monitoring once per hour for 24 hours and once per 30 minutes thereafter when the alarm is inoperable. These requirements are a carryover from the previous methodology (constant axial offset) and are not necessary for the current methodology (relaxed axial offset control) for AFD and are thus deleted. Logging of AFD was previously required to establish penalty minutes for being outside of constant target bands. Target bands are not associated with the relaxed axial offset control schemes. ITS SR 3.2.3.1 requires monitoring once within 1 hour and once per hour thereafter when the alarm is inoperable. There is no basis for providing increased monitoring after 24 hours of alarm inoperability and the requirement adds an unnecessary administrative burden to the operating staff. A failure of the alarm to function does not affect the ability of the operator to routinely monitor control board indication of AFD as part of the normal operating practice, nor does the alarm failure itself cause AFD to not be within limits. For these reasons, these changes are acceptable.

ITS Section 3.4, Reactor Coolant Systems (RCS)

L.11 The CTS 4.4.6.2.1 requirement to monitor the RCS leakage by use of the containment atmosphere radioactivity, sump level, and reactor head flange leakoff system once per 12 hours, is deleted. This is acceptable because Channel Checks of leak detection instrument channels are required once per 12 hours by CTS 4.4.6.1 which is retained in

the SRs of ITS 3.4.15. Thus, the parameters will continue to be monitored once per 12 hours. The requirement to monitor reactor head flange leakoff is also deleted. This is acceptable because leakage into this system is identified leakage into the reactor coolant drain tank. In addition, the CTS 4.4.6.2.1 requirement to perform a water inventory balance is retained as ITS SR 3.4.13.1 and is the definitive surveillance for establishing leakage within limits.

L.19 (CNS only) CNS CTS 3/4.4.6.1 Action requires a shutdown be initiated within 30 days if the containment ventilation unit condensate drain tank (CVCDT) level monitoring system is inoperable. CNS ITS 3.4.15 Action C permits continued operation provided either a channel check of the required containment atmosphere radioactivity monitor is performed once per 8 hours or an RCS water inventory balance is performed once per 24 hours in accordance with CNS ITS SR 3.4.13.1. This change is acceptable because diverse instrumentation or compensatory measures continue to be available to plant operators which will assist in early detection of any change in RCS leakage.

ITS Section 3.9, Refueling

L.1 CTS 4.9.1.1 requires determining the more restrictive reactivity condition of either K_{eff} or boron concentration prior to removing or unbolting the reactor vessel head or withdrawal of any full-length control rod in excess of 3 feet from its fully inserted position within the reactor vessel. The K_{eff} determination part of this surveillance is deleted. Corresponding ITS SR 3.9.1.1 ensures the boron concentration is within limits of the COLR once per 7 hours, which is a reasonable amount of time to verify the boron concentration of representative samples. This change is acceptable because maintaining K_{eff} within limit is ensured by maintaining boron concentration within the required limit. Also, ITS SR 3.0.4 requires the surveillance to be current before entering a mode or other specified conditions in the applicability. Therefore, adequate shutdown margin is ensured prior to movement of irradiated fuel assemblies or entry into Mode 6.

Table L of the less restrictive changes lists all CTS requirements that have been relaxed and which pertain to Category I though VIII and to the specific listing of changes discussed above. Table L also lists those less restrictive changes that are discussed individually in Section III.G below.

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

D. Technical Changes - Less Restrictive (Generic)

When requirements in the TS have been shown to give little or no safety benefit, their removal from the TS may be appropriate. This section discusses the relocation of details within the CTS to licensee-controlled documents, instead of the relocation of entire specifications from the CTS to licensee-controlled documents which is discussed below in Section III.E. In most cases, relaxations previously granted to licensees 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 the STS (the TSTF process). In evaluating the proposed relocation of TS details to license-controlled documents, the staff reviewed the specific design bases and licensing bases for the CNS and MNS units, and determined that these bases are consistent with the technical basis for the model requirements in the STS. Additionalyy, the NRC staff had previously reviewed generic relaxations contained in the STS and found them acceptable because they are consistent with current licensing practices and the Commission's regulations. Accordingly, the NRC staff finds that the proposed ITS for CNS and MNS units, while containing fewer details than the CTS, will provide an adequate basis for safe operation of the units.

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 3 that follow:

Type 1	Details of System Design
Type 2	Descriptions of System Operation
Type 3	Procedural Details for Meeting TS Requirements

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

Details of System Design (Type 1)

The CTS contain descriptions of plant design including design limits inherent to the plant or system. Some of these descriptions address component or system design features and limits which are not credited in the safety analyses or which do not support the Operability of associated LCO-required features. CTS also contain lists of features that support the Operability of LCO-required systems. The ITS, consistent with the STS, omit these kinds of details, which are moved to licensee-controlled documents such as the UFSAR, the Selected Licensee Committments (SLC) Manual, and the ITS Bases, changes to which are adequately governed by regulation or by ITS administrative controls.

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 (referenced 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. The ITS Bases also contain descriptions of system design and operability requirements. ITS 5.5.14, Bases Control Program, specifies controls for changing the ITS Bases.

For a system to be considered Operable, the definition of Operability as it pertains to the system must be satisfied. In addition, the specified SRs associated with the LCO governing the system must be met. Some CTS LCOs contain information concerning design and configuration implying that they relate to meeting the Operability requirements of the LCO. Such information is usually incomplete and is actually redundant to the definition of Operability and the associated SRs. Because the Operability requirements for the affected systems and supporting SRs are being retained in the improved TS, and adequate TS or regulatory controls exist for any changes to the removed information, moving such information to licensee-controlled documents has no impact on the effectiveness of the ITS to ensure safe operation of the plant.

Limits such as the cycle-specific core design limits, are moved from the CTS to other documents. The cycle-specific core design limits are moved to the Core Operating Limits Report (COLR) in accordance with Generic Letter (GL) 88-16. Removal of these limits is acceptable because ITS administrative controls include adequate programmatic requirements to control limits removed from the CTS to such documents as the COLR.

Relocation of details of system design from the CTS is consistent with the content, format, and presentation of information in the STS. In addition, existing regulations and TS administrative controls will ensure an effective level of regulatory control of this information and will provide a more appropriate change control process. Therefore, changes falling within Type 1 are acceptable.

Descriptions of System 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 Regulatory Guide 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. The ITS Bases also contain descriptions of system operation. ITS 5.5.14, Bases Control Program, specifies controls for changing the ITS Bases. It is acceptable to remove details and descriptions of system operation from the CTS because this type of information will be adequately controlled in the UFSAR, plant operating procedures, and the ITS Bases, as appropriate. Therefore, changes falling within Type 2 are acceptable.

Procedural Details for Meeting TS Requirements (Type 3)

Details for performing CTS action and surveillance requirements, maintaining and controlling CTS administrative requirements, and statements providing clarification of CTS requirements are more appropriately specified in the UFSAR, QA plan, Selected Licensee Commitments (SLC) Manual, or ITS Bases as appropriate. Changes to the information governed by one of these documents requires an evaluation in accordance with 10 CFR 50.54, 10 CFR 50.59, or ITS 5.5.14, Bases Control Program.

The control of the plant conditions appropriate to perform a surveillance test is typically an issue for procedures and scheduling (except where a Mode or condition specified in the Applicability of the LCO must first be entered in order to perform the surveillance). The inclusion of routine procedural guidance has previously been determined to be unnecessary as a TS restriction. As indicated in GL 91-04, allowing this procedural control is consistent with the vast majority of other SRs that do not dictate specific plant conditions for surveillances. In addition, lists or tables containing TS related information or data have also previously been determined to be unnecessary as a TS restriction. GL 93-08 specifically approved the removal from the TS of the surveillance acceptance criteria in the instrument response time tables. The ITS extends the allowance provided in GL 93-08 to include the removal of most tables and lists of information pertaining to surveillances or LCOs from the TS. Similarly, prescriptive procedural information in action requirements are unnecessary as a TS restriction. The inclusion of specific procedural detail in action requirements is unlikely to contain all the procedural considerations necessary for the plant operators to complete the actions required, and referral to plant procedures is therefore required in any event. The CTS also contain many general statements intended to explain or clarify the intent of requirements in LCOs, action statements, and surveillances. The ITS Bases document provides a more appropriate location for these types of informational statements.

CTS also contain procedural details for meeting CTS administrative controls such as requirements for the Nuclear Safety Review Board (NSRB). The CTS specify such details as the function, composition, alternatives, consultants, meeting frequency, quorum, review, audits, and records of the NSRB. These details of the NSRB activities can be adequately addressed in the QA Plan documentation and do not need to be included in the ITS. Changes to the QA Plan must be evaluated in accordance with 10 CFR 50.54; thus, adequate regulatory control is ensured. In addition to the QA Plan, other similar procedural details for meeting CTS administrative controls are moved to the UFSAR or SLC Manual which are adequately controlled by the provisions of 10 CFR 50.59.

Other changes involving the removal of procedural details include those details removed from the CTS which are associated with limits retained in the ITS. For example, the ITS requirement may simply refer to programmatic requirements such as the Ventilation Filter Testing Program (VFTP), included in ITS 5.5.11, which specifies the limits and test requirements contained in the VFTP. The ITS VFTP provides adequate programmatic control of the associated procedural details removed from the CTS. Changes to ITS 5.5.11 must be approved by the NRC.

These changes are consistent with the content, format, and presentation of information in the STS. In addition, existing regulations and TS administrative controls will ensure an effective level of regulatory control of this information and will provide a more appropriate change control process. Therefore, changes falling within Type 3 are acceptable.

Table LA lists the requirements and detailed information in the CTS that are relocated to licensee-controlled documents and not made part of the ITS. Table LA is organized in ITS order by each LA-type DOC to the CTS. It includes: (1) the ITS section designation followed by the DOC identifier (e.g., 3.3 followed by LA.1 means ITS Section 3.3, DOC LA.1); (2) CTS reference; (3) a summary description of the relocated details (summary of change); (4) the name of the document to contain the relocated details or requirements (destination document); (5) the method for controlling future changes to relocated requirements (control process); and (6) a reference to the specific change type, as discussed above, for not including the information or specific requirements in the ITS.

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 adequate protection of 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:

- TS Bases controlled in accordance with 10 CFR 50.59, as stated in ITS 5.5.14, "Technical Specifications Bases Control Program."

- UFSAR (which includes the SLC Manual by reference) controlled by 10 CFR 50.59.

- Offsite Dose Calculation Manual controlled by ITS 5.5.1.

- QA plan, as approved by the NRC and referenced in the UFSAR, controlled by 10 CFR Part 50, Appendix B, and 10 CFR 50.54(a).

For each of these changes that address details relocated from the CTS, Table LA, as noted above, lists the licensee-controlled documents and the TS or regulatory requirements governing changes to those documents.

To the extent that requirements and information have been relocated to licensee-controlled documents, the NRC staff has determined that 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 10 CFR 50.36 (discussed in Section II of this SE). Accordingly, existing detailed information and specific requirements, such as generally described above, may be removed from the CTS and not included in the ITS.

E. Relocated Entire CTS Specifications

The Commission's Final Policy Statement states that LCOs and associated requirements that do not satisfy or fall within any of the four criteria (now codified in 10 CFR 50.36) may be relocated from existing TS (an NRC-controlled document) to appropriate licensee-controlled documents. This section discusses the relocation of entire specifications from the CTS to licensee-controlled documents. These specifications include the LCOs, Action Statements (i.e., Actions), and associated SRs. In its amendment requests the licensee proposed relocating such specifications from the CTS to the SLC Manual, which is incorporated in the UFSAR by reference. The staff has reviewed the licensee's submittals, and finds that relocation of these requirements to the SLC Manual is acceptable, in that changes to the UFSAR and SLC Manual will be adequately controlled by 10 CFR 50.59. 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 the STS, also proposed, in accordance with the criteria in the Final Policy Statement and 10 CFR 50.36, to entirely remove certain specifications from the CTS and place them in licensee-controlled documents as noted in Table R. Table R lists all specifications that are relocated from the CTS based on the Final Policy Statement and 10 CFR 50.36, to licensee-controlled documents. Table R is organized by each R-type DOC to the CTS, in a manner consistent with the organization of requirements in the ITS, followed by a reference to the associated relocated CTS specification; a summary description of the relocated CTS specification; the name of the document that will contain the relocated specification (destination document); and the method for controlling future changes to the relocated specification (control process). The NRC staff's evaluation of each relocated specification presented in Table R is provided below with the corresponding DOC identifier given in parenthesis after the title of each relocated specification.

1. 3/4.1.2.1 Minimum Boron Injection Flow Paths, Modes 5 and 6 (3.1 - R.1)
   3/4.1.2.2 Minimum Boron Injection Flow Paths, Modes 1, 2, 3, and 4 (3.1 - R.2)
   3/4.1.2.3 Charging Pump in Boron Injection Flow Path, Modes 5 and 6 (3.1 - R.3)
   3/4.1.2.4 Charging Pumps, Modes 1, 2, 3, and 4 (3.1 - R.4)
   3/4.1.2.5 Borated Water Sources, Modes 5 and 6 (3.1 - R.5)
   3/4.1.2.6 Borated Water Sources, Modes 1, 2, 3, and 4 (3.1 - R.6)

   CTS 3/4.1.2 specifies requirements for boration flow paths, borated water sources and charging pumps in the boration flow path. The boration subsystem of the chemical and volume control system (CVCS) provides the means to meet one of the functional requirements of the CVCS, i.e., to control the chemical neutron absorber (boron) concentration in the reactor coolant system (RCS) and to help maintain the shutdown margin. To accomplish this functional requirement, the CTS require a source of borated water, one or more flow paths to inject this borated water into the RCS, and appropriate charging pumps to provide the necessary charging head.

The boration subsystem is not assumed to be operable to mitigate the consequences of a design basis accident (DBA) or transient. In the case of a malfunction of the CVCS that causes a boron dilution event, the operator must take action (or automatic response) to close the appropriate valves in the reactor makeup system before the shutdown margin is lost. Operation of the boration subsystem is not assumed to mitigate this event. In addition, the boration subsystem is not used for, nor is it capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA. It also is not used to monitor a process variable, or the status of any design feature, or operating restriction that is an initial condition of a DBA or transient. The boration subsystem is not part of a primary success path in the mitigation of a DBA or transient. Therefore, CTS 3/4.1.2.1 through 3/4.1.2.6 do not meet any of the criteria in 10 CFR 50.36 and may be removed from the CTS and relocated to the SLC Manual (UFSAR Chapter 16).

Note that CTS 4.1.2.4.2 is retained as ITS LCO 3.4.12 for low temperature over pressure protection requirements. Any changes to these former requirements regarding the boration subsystem, as relocated to the SLC Manual, will be subject to the requirements of 10 CFR 50.59. Thus, under 10 CFR 50.59, sufficient regulatory controls exist to ensure continued protection of the public health and safety.

2. 3/4.1.3.3 Digital Rod Position Indicator Channels for Each Shutdown and Control Rod in Modes 3, 4, and 5 (3.1 - R.7)

CTS 3/4.1.3.3 specifies requirements for rod position indication in MODES 3, 4, and 5. Control rod operability is assumed for all transients in which a reactor trip is assumed to occur. However, the ±12 step alignment limitation is not assumed in MODES 3, 4 or 5 because the reactor is shutdown. The rod alignment and position indication is only necessary when the reactor is critical to ensure proper power distribution. The position indication system is not used for, nor is it capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA. The position indication system is not used to monitor a process variable, or the status of any design feature, or operating restriction that is an initial condition of a DBA or transient. The position indication system is not part of a primary success path in the mitigation of a DBA or transient. Therefore, CTS 3/4.1.3.3 does not meet any of the criteria in 10 CFR 50.36 and may be removed from the CTS and relocated to the SLC Manual.

Note that CTS 4.1.3.3 is retained as ITS SR 3.1.7.1 for rod position indication in MODES 1 and 2. Any changes to these former requirements regarding the position indication system, as relocated to the SLC Manual, will be subject to the requirements of 10 CFR 50.59. Thus, under 10 CFR 50.59, sufficient regulatory controls exist to ensure continued protection of the public health and safety.

3. 3/4.3.3.1 Containment Atmosphere Gaseous Detector Channel for Effluent Monitoring (EMF-39),
Fuel Storage Pool Radioactivity Monitor (EMF-42),

Fuel Storage Pool Criticality Radiation Monitor (EMF-15) (CNS) and (EMF-17 for Unit 1 and EMF-4 for Unit 2) (MNS),
Control Room Air Intake Gaseous Radiation Monitors (EMF-43A, 43B),
Auxiliary Building Ventilation Gaseous Radioactivity Monitor (EMF-41) (CNS), and
Component Cooling Water System Radiation Monitors (EMF-46A, 46B) (CNS)
(3.3 - R.4)

The containment atmosphere - high gaseous radioactivity monitor (EMF-39) serves as both a containment effluent monitor and as an RCS leak detection monitor along with the particulate channel (EMF-38). The CTS requirements for RCS leak detection monitoring are retained in ITS 3.4.15.

The fuel storage pool high gaseous radioactivity monitor (EMF-42) monitors radioactivity in the fuel building ventilation system and will automatically close the bypass path and initiate filtered exhaust of the fuel building air. Although these monitors perform an automatic actuation function, this design feature is not credited in the licensing basis of the plant for a fuel handling accident in the fuel building. ITS 3.7.13 requires the fuel building ventilation system to be in continuous filtered operation during movement of irradiated fuel assemblies within the fuel building so that an automatic actuation is not necessary. ITS 3.7.13 for Catawba, and ITS 3.7.12 for McGuire, also require a suspension of fuel handling activities, should the system become inoperable. Based on this, the fuel storage pool high gaseous radioactivity monitor does not provide an actuation function that is credited to mitigate a fuel handling accident.

The fuel storage pool criticality radiation monitor (EMF-15) for Catawba monitors radioactivity in the fuel storage pool area. This monitor does not provide any mitigation of a DBA. The monitor does, however, prevent the new fuel elevator from raising spent fuel assemblies. It may also function as a criticality monitor upon detection of high radiation. These functions do not contribute to DBA analysis assumptions.

The criticality radiation monitor (EMF-17 for Unit 1 and EMF-4 for Unit 2) for McGuire monitors radioactivity in the fuel storage pool area. This monitor does not provide any mitigation of a DBA. It is provided as a criticality monitor, and it does sound the alarm upon detection of high radiation.

The control room air intake gaseous radiation monitors (EMF-43A, 43B) are provided to identify increasing levels of radioactivity in the control room intakes. The Catawba control room area ventilation system (CRAVS) operates continuously in a filtered mode. The CRAVS does not rely on these monitors to perform any actuation function to mitigate the effects of a DBA.

The auxiliary building ventilation gaseous radioactivity monitor (EMF-41) for Catawba is provided to monitor the auxiliary building ventilation system for increasing levels of radiation. These monitors will realign the ventilation system to filtered operation on high levels of radioactivity. Although these monitors perform an automatic actuation function

this is a design feature of the system and is not credited in the licensing basis of the plant for a loss-of-coolant accident (LOCA). The safety function for the ventilation system is to filter the ECCS pump rooms following a LOCA. Filtered operation is automatically accomplished by the safety injection signal. But no credit is taken for radiation monitor operation during a LOCA. This monitor only provides indication of effluent releases.

The component cooling water system radiation monitors (EMF-46A, 46B) for Catawba are provided to identify leaks of contaminated water into the component cooling system. These monitors provide no control or actuation function and serve only to alert operators to isolate a leaking heat exchanger. No credit is taken for radiation monitor operation to mitigate or identify a DBA.

Therefore, CTS 3/4.3.3.1 does not meet any of the criteria in 10 CFR 50.36 and may be removed from the CTS and relocated to the SLC Manual. Any changes to these former requirements regarding these radiation monitors, as relocated to the SLC Manual, will be subject to the requirements of 10 CFR 50.59. Thus, under 10 CFR 50.59, sufficient regulatory controls exist to ensure continued protection of the public health and safety.

4. 3/4.3.3.2 Movable Incore Detection System (3.3 - R.1)

CTS 3/4.3.3.2 ensures the operability of movable incore detector instrumentation when it is required to monitor the flux distribution within the core. The detectors are used for periodic determination of the power distribution and calibration of the excore detectors, but they are not assumed in any DBA analysis and do not mitigate any accident. Therefore, CTS 3/4.3.3.2 does not meet any of the criteria in 10 CFR 50.36 and may be removed from the CTS and relocated to the SLC Manual. Any changes to these former requirements regarding the Movable Incore Detectors, as relocated to the SLC Manual, will be subject to the requirements of 10 CFR 50.59. Thus, under 10 CFR 50.59, sufficient regulatory controls exist to ensure continued protection of the public health and safety.

5. 3/4.3.3.7 Chlorine Detection System (CNS) (3.3 - R.2)

The chlorine detection system promptly detects and initiates protective action in the event of an accidental chlorine release to protect control room personnel. However, the instrument is not assumed to mitigate a DBA or transient since an accidental chlorine release is not a DBA or transient. Therefore, CTS 3/4.3.3.7 does not meet any of the criteria in 10 CFR 50.36 and may be removed from the CTS and relocated to the SLC Manual. Any changes to these former requirements regarding the chlorine detection system, as relocated to the SLC Manual, will be subject to the requirements of 10 CFR 50.59. Thus, under 10 CFR 50.59, sufficient regulatory controls exist to ensure continued protection of the public health and safety.

6. 3/4.3.3.9 Explosive Gas Monitoring Instrumentation (MNS)
3/4.3.3.10 Explosive Gas Monitoring Instrumentation (CNS)
(3.3 - R.3)

The explosive gas monitoring instrumentation ensures that the concentration of potentially explosive gas mixtures contained in the gaseous waste processing system is adequately monitored, which helps to ensure that the concentration is maintained below the flammability limit. However, the system is designed to contain detonations and will not affect the function of any safety related equipment. The concentration of oxygen in the gaseous waste processing system is not an initial assumption of any DBA or transient analysis. Therefore, CTS 3/4.3.3.9 (MNS) and 3/4.3.3.10 (CNS) do not meet any of the criteria in 10 CFR 50.36 and may be removed from the CTS and relocated to the SLC Manual. Any changes to these former requirements regarding the explosive gas monitoring instrumentation, as relocated to the SLC Manual, will be subject to the requirements of 10 CFR 50.59. Thus, under 10 CFR 50.59, sufficient regulatory controls exist to ensure continued protection of the public health and safety.

7. 3/4.4.2.1 Pressurizer Safety Valves, Modes 4 and 5 (3.4 - R.1)

The pressurizer safety valves protect the RCS from being pressurized above the RCS pressure Safety Limit. The pressurizer safety valves provide over pressurization protection during Modes 1, 2 and 3. The pressurizer safety valves are not assumed to function to mitigate a DBA or transient below Mode 3, because over pressure protection is provided under these conditions by the low temperature over pressure protection requirements in ITS LCO 3.4.12. Therefore, CTS 3/4.4.2.1 does not meet any of the criteria in 10 CFR 50.36 and may be removed from the CTS and relocated to the SLC Manual. Any changes to these former requirements regarding the pressurizer safety valves, as relocated to the SLC Manual, will be subject to the requirements of 10 CFR 50.59. Thus, under 10 CFR 50.59, sufficient regulatory controls exist to ensure continued protection of the public health and safety.

8. 3/4.4.7 RCS Chemistry (3.4 - R.2)

Poor coolant water chemistry contributes to the long-term degradation of system materials of construction, but is not of immediate importance to the plant operator. Reactor coolant water chemistry is monitored for a variety of reasons. One reason is to reduce the possibility of failures in the reactor coolant system pressure boundary caused by corrosion. However, the chemistry monitoring activity serves a long-term preventative rather than mitigative purpose. Therefore, CTS 3/4.4.7 does not meet any of the criteria in 10 CFR 50.36 and may be removed from the CTS and relocated to the SLC Manual. Any changes to these former requirements regarding the RCS chemistry, as relocated to the SLC Manual, will be subject to the requirements of 10 CFR 50.59. Thus, under 10 CFR 50.59, sufficient regulatory controls exist to ensure continued protection of the public health and safety.

9. 3/4.4.9.2 Pressurizer Heatup and Cooldown Limits (3.4 - R.3)

The heatup and cooldown rate limits are placed on the pressurizer to prevent nonductile failure and assure compatibility of operation with the fatigue analysis performed. The limits meet the requirements given in the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section III, Appendix G. These limitations are consistent with structural analysis results. These limits are not initial condition assumptions of a DBA or transient; however, they do represent operating restrictions, which are addressed by Criterion 2. However, in the NRC Final Policy Statement on TS, the Criterion 2 discussion specified that only those operating restrictions required to preclude unanalyzed accidents and transients need be included in the TS. CTS 3/4.4.9.2 does not meet this test. Therefore, CTS 3/4.4.9.2 does not meet any of the criteria in 10 CFR 50.36 and may be removed from the CTS and relocated to the SLC Manual. Any changes to these former requirements regarding the pressurizer heatup and cooldown limits, as relocated to the SLC Manual, will be subject to the requirements of 10 CFR 50.59. Thus, under 10 CFR 50.59, sufficient regulatory controls exist to ensure continued protection of the public health and safety.

10. 3/4.4.10 Structural Integrity of ASME Code Class 1, 2, and 3 Components (3.4 - R.4)

The inspection programs for ASME Code Class 1, 2, and 3 components ensures that structural integrity of these components will be maintained throughout the components life. ASME Code Class 1, 2, and 3 components are monitored so that the possibility of component structural failure does not degrade the safety function of the system. The monitoring activity is a preventive action rather than a mitigative action. While some other requirements in CTS call for important systems to be Operable (e.g., emergency core cooling system) and in a ready state for mitigative action, this requirement is directed more toward prevention of degradation and continued long term maintenance of acceptable structural conditions. The inservice inspection (ISI) program is also required by 10 CFR 50.55a. These controls ensure that any changes to these requirements are appropriately reviewed. Hence, it is not necessary to retain a separate requirement to ensure immediate Operability of safety systems. Furthermore, this CTS requirement prescribes inspections to be conducted during plant shutdown, and is not directly important for responding to a DBA. Therefore, CTS 3/4.4.10 does not meet any of the criteria in 10 CFR 50.36 and may be removed from the CTS and relocated to the SLC Manual, with the exception of the reactor coolant pump (RCP) flywheel inspection surveillance. The RCP flywheel inspection requirement has been retained as ITS 5.5.7. Any changes to these former requirements regarding the structural integrity of ASME Code Class 1, 2, and 3 components, as relocated to the SLC Manual, will subject to the requirements of 10 CFR 50.59. Thus, under 10 CFR 50.59, sufficient regulatory controls exist to ensure continued protection of the public health and safety.

11. 3/4.4.11 RCS Vent Paths Operable and Closed for Reactor Vessel Head and Pressurizer Steam Space (CNS)
3/4.4.11 Reactor Vessel Head Vent Paths Operable and Closed (MNS)
(3.4 - R.5)

The reactor vessel head vents are provided to exhaust noncondensible gases and steam from the RCS which could inhibit natural circulation core cooling following any event involving a loss of offsite power and requiring long term cooling, such as a LOCA. The function, capabilities, and testing requirements are consistent with the requirements of Item II.B.1 of NUREG-0737, "Clarification of TMI Action Plan Requirements," however, the operation of these vents is an operator action after the event has occurred and is only required when there is indication that natural circulation is not occurring. Therefore, CTS 3/4.4.11 does not meet any of the criteria in 10 CFR 50.36 and may be removed from the CTS and relocated to the SLC Manual. Any changes to these former requirements regarding the reactor coolant system vents, as relocated to the SLC Manual, will be subject to the requirements of 10 CFR 50.59. Thus, under 10 CFR 50.59, sufficient regulatory controls exist to ensure continued protection of the public health and safety.

12. 3/4.6.5.2 Ice Bed Temperature Monitoring System (3.6 - R.1)

The ice bed temperature monitoring system monitors the temperature of the ice bed to ensure that the ice bed temperature does not increase above the required limits undetected. However, it is not required in the ITS to ensure the ice bed temperature is maintained within limits. ITS 3.6.12, "Ice Bed," will continue to ensure that temperature is maintained within the required limits. Therefore, CTS 3/4.6.5.2 does not meet any of the criteria in 10 CFR 50.36 and may be removed from the CTS and relocated to the SLC Manual. Any changes to these former requirements regarding the ice bed temperature monitoring system, as relocated to the SLC Manual, will be subject to the requirements of 10 CFR 50.59. Thus, under 10 CFR 50.59, sufficient regulatory controls exist to ensure continued protection of the public health and safety.

13. 3/4.6.5.4 Ice Condenser Inlet Door Position Monitoring System (3.6 - R.2)

The inlet door position monitoring system monitors the position of the ice bed inlet doors during normal operation to ensure that the ice bed inlet doors do not open (which could allow the ice bed temperature to increase above the required limits). However, the inlet door position monitoring system is not required in the ITS to ensure the inlet doors remain closed and ice bed temperature is maintained within limits. ITS 3.6.12, "Ice Bed," will continue to ensure that the inlet doors remain closed and temperature is maintained within the required limits. Therefore, CTS 3/4.6.5.4 does not meet any of the criteria in 10 CFR 50.36 and may be removed from the CTS and relocated to the SLC Manual. Any changes to these former requirements regarding the Inlet door position monitoring system, as relocated to the SLC Manual, will subject to the requirements of

10 CFR 50.59. Thus, under 10 CFR 50.59, sufficient regulatory controls exist to ensure continued protection of the public health and safety.

14. 3/4.7.2 Steam Generator Pressure/Temperature Limitations (3.7 - R.1)

CTS 3/4.7.2, "Steam Generator Pressure/Temperature Limitations," specifies limits on steam generator (SG) pressures and temperatures to ensure that pressure induced stresses on the SG do not exceed the maximum allowable fracture toughness limits. These pressure and temperature limits are based on maintaining a SG reference transition nil ductility temperature sufficient to prevent brittle fracture. As such, the TS places limits on variables consistent with structural analysis results; these limits, however, are not initial condition assumptions of a DBA or transient, but represent operating restrictions. Therefore, CTS 3/4.7.2 does not meet any of the criteria in 10 CFR 50.36 and may be removed from the CTS and relocated to the SLC Manual. Any changes to these former requirements regarding the SG pressures and temperatures, as relocated to the SLC Manual, will be subject to the requirements of 10 CFR 50.59. Thus, under 10 CFR 50.59, sufficient regulatory controls exist to ensure continued protection of the public health and safety.

15. 3/4.7.8 Snubbers (3.7 - R.5)

Snubbers support the operability of primary components whose operation or function may be an assumption of a safety analysis. However, snubbers are not considered to be part of the primary success path. Their purpose is to prevent unrestrained pipe motion under dynamic loads while also allowing normal thermal expansion of piping and nozzles to eliminate excessive thermal stresses during heatup and cooldown. The requirements for snubber inspection are also contained in 10 CFR 50.55a and need not be repeated in the ITS. Snubber details are defined in ISI program. Changes to the ISI program are adequately controlled by 10 CFR 50.55a. Therefore, CTS 3/4.7.8 does not meet any of the criteria in 10 CFR 50.36 and may be removed from the CTS and relocated to the SLC Manual. Any changes to these former requirements regarding the snubbers and associated surveillances, as relocated to the SLC Manual, will be subject to the requirements of 10 CFR 50.59. Thus, under 10 CFR 50.59, sufficient regulatory controls exist to ensure continued protection of the public health and safety.

16. 3/4.7.9 Sealed Source Contamination Limits (3.7 - R.3)

CTS 3/4.7.9, "Sealed Source Contamination," provides limitations on sealed source contamination to ensure the total body and individual organ irradiation doses do not exceed allowable limits in the event of ingestion or inhalation. This requirement is not necessary to ensure safe reactor operation. Therefore, CTS 3/4.7.9 does not meet any of the criteria in 10 CFR 50.36 and may be removed from the CTS and relocated to the SLC Manual. Any changes to these former requirements regarding the sealed source contamination and surveillances, as relocated to the SLC Manual, will be subject to the

requirements of 10 CFR 50.59. Thus, under 10 CFR 50.59, sufficient regulatory controls exist to ensure continued protection of the public health and safety.

17. 3/4.7.12 Ground Water Level near Reactor and Auxiliary Buildings (CNS)
3/4.7.13 Ground Water Level near Auxiliary Building (MNS)
(3.7 - R.4)

Groundwater level limits are required to be maintained at or below the top of the adjacent floor slabs of the reactor containment building and the auxiliary building to preclude movement of the building from the floating effect of groundwater. These limits, however, are not necessary to ensure safe reactor operation because ground water level is a slow-changing parameter that has no immediate effect on reactor operation. Therefore, the ground water level requirements in CTS 3/4.7.12 for CNS and CTS 3/4.7.13 for MNS do not meet any of the criteria in 10 CFR 50.36 and may be removed from the CTS and relocated to the SLC Manual. Any changes to these former requirements regarding the groundwater level limits, as relocated to the SLC Manual, will be subject to the requirements of 10 CFR 50.59. Thus, under 10 CFR 50.59, sufficient regulatory controls exist to ensure continued protection of the public health and safety.

18. 3/4.7.12 Area Temperature Monitoring (MNS) (3.7 - R.2)

CTS 3/4.7.12 requires area temperature monitoring to indicate that safety-related equipment in various areas of the plant is not being subjected to conditions beyond the defined environmental qualification envelope. This information, however, does not serve any primary safety function. Therefore, CTS 3/4.7.12 does not meet any of the criteria in 10 CFR 50.36 and may be removed from the CTS and relocated to the SLC Manual. Any changes to these former requirements regarding the area temperature monitoring and surveillances, as relocated to the SLC Manual, will be subject to the requirements of 10 CFR 50.59. Thus, under 10 CFR 50.59, sufficient regulatory controls exist to ensure continued protection of the public health and safety.

19. 3/4.7.13 Standby Shutdown System (CNS) (3.7 - R.6)

CTS 3/4.7.13 identifies diesel generators, makeup pumps, and batteries as standby shutdown system equipment which is used to ensure that a fire requiring evacuation of the control room will not preclude achieving safe shutdown. This equipment is independent of areas where fire could damage those systems normally used to shutdown the reactor. This system is credited in certain beyond design basis loss of function scenarios (e.g., loss of service water or component cooling water) to minimize core damage frequency and offsite releases. And this system is subject to the regulations associated with the maintenance rule (10 CFR 50.65) and fire protection (10 CFR 50, Appendix R). These regulations ensure adequate regulatory control over the availability of this equipment for standby shutdown. However, this system is not used to detect a degradation of the reactor coolant pressure boundary, nor is it assumed to

mitigate a DBA or transient event. Thus, the standby shutdown requirements for this equipment are not necessary to ensure safe reactor operation. Therefore, CTS 3/4.7.13 does not meet any of the criteria in 10 CFR 50.36 and may be removed from the CTS and relocated to the SLC Manual. Any changes to these former requirements regarding the standby shutdown system equipment, as relocated to the SLC Manual will be subject to the requirements of 10 CFR 50.59. Thus, under 10 CFR 50.59 and the other regulatory requirements cited, sufficient regulatory controls exist to ensure continued protection of the public health and safety.

20. 3/4.8.4 Containment Penetration Conductor Overcurrent Protection Devices (3.8 - R.1)

The primary function of the containment penetration conductor overcurrent protection devices is to open appropriate control and power circuits whenever the circuit load conditions exceed the present breaker setpoints. Doing so will protect the circuit conductors in the containment penetrations from overcurrent heating effects that could cause damage or failure of the conductors and the penetration. The continuous monitoring of the operating status of the overcurrent protection devices, however, is not practicable and is not a part of normal control room monitoring, except after breaker trip condition indications. In the event an overcurrent protective device fails to trip the circuit, the design includes an upstream protective device that will operate to isolate the faulty circuit. Thus, the protective devices that provide coordination against losing the redundant power source are at a much higher level in the power system. This backup device ensures, that in the event of a single failure loss of the primary device, there is still a device to protect the penetration. In the worst case fault condition, a single division of protective functions can be lost, without losing the capability to adequately respond to a DBA event. Therefore, CTS 3/4.8.4 does not meet any of the criteria in 10 CFR 50.36 and may be removed from the CTS and relocated to the SLC Manual. Any changes to these former requirements regarding the containment penetration conductor overcurrent protective devices, as relocated to the SLC Manual, will be subject to the requirements of 10 CFR 50.59. Thus, under 10 CFR 50.59, sufficient regulatory controls exist to ensure continued protection of the public health and safety.

21. 3/4.9.5 Communications Between Control Room and Refueling Station (3.9 - R.1)

CTS 3/4.9.5, "Communications" ensures that refueling station personnel can be promptly informed of significant changes in facility status or core reactivity conditions during Core Alterations. Communications allow for coordination of activities that require interaction between the control room and containment personnel. However, the refueling system design accident or transient response does not take credit for communications. Therefore, CTS 3/4.9.5 does not meet any of the criteria in 10 CFR 50.36 and may be removed from the CTS and relocated to the SLC Manual. Any changes to these former requirements regarding the requirements for communications capabilities, as relocated to the SLC Manual, will be subject to the requirements of 10

CFR 50.59. Thus, under 10 CFR 50.59, sufficient regulatory controls exist to ensure continued protection of the public health and safety.

22. 3/4.9.6 Reactor Building Manipulator Crane and Auxiliary Hoist (3.9 - R.2)

CTS 3/4.9.6, "Manipulator Crane" ensures that the equipment used to handle fuel within the reactor pressure vessel functions as designed and that the equipment has sufficient load capacity for handling fuel assemblies and control rods. Although the interlocks designed to provide the above capabilities can prevent damage to the refueling equipment and fuel assemblies, they are not assumed to function in mitigating the consequences of a DBA. Therefore, CTS 3/4.9.6 does not meet any of the criteria in 10 CFR 50.36 and may be removed from the CTS and relocated to the SLC Manual. Any changes to these former requirements regarding the manipulator crane, as relocated to the SLC Manual, will be subject to the requirements of 10 CFR 50.59. Thus, under 10 CFR 50.59, sufficient regulatory controls exist to ensure continued protection of the public health and safety.

23. 3/4.9.7 Load Handling Restrictions over Fuel Assemblies in Storage Pool (3.9 - R.3)

The restriction on movement of loads in excess of the nominal weight of a fuel assembly over other fuel assemblies in the storage pool ensures that, in the event the load is dropped, the activity release will be limited to that contained in 1.2 fuel assemblies and any possible distortion of the fuel in the storage racks will not result in a critical array. Administrative monitoring of loads moving over the fuel storage racks serves as a backup to the crane interlocks. Although CTS 3/4.9.7, "Crane Travel - Spent Fuel Pool Building," supports the maximum refueling accident assumption in the DBA, the crane travel limits are not monitored and controlled during operation; they are checked on a periodic basis to ensure operability. Therefore, CTS 3/4.9.7 does not meet any of the criteria in 10 CFR 50.36 and may be removed from the CTS and relocated to the SLC Manual. Any changes to these former requirements regarding the crane travel - spent fuel pool building, as relocated to the SLC Manual, will be subject to the requirements of 10 CFR 50.59. Thus, under 10 CFR 50.59, sufficient regulatory controls exist to ensure continued protection of the public health and safety.

The relocated specifications from the CTS discussed above are not required to be in the TS because they 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 the SLC Manual. This relocation is the subject of a license condition discussed in Section V of this SE. Until incorporated in these licensee-controlled documents, 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 relocated provisions to ensure that an appropriate level of control has been achieved. The NRC staff has concluded that, in accordance with the Commission's Final Policy Statement, sufficient regulatory controls exist under the regulations, particularly 10 CFR 50.59, to adequately ensure that the relocations discussed above will not adversely impact safe operations at the CNS and MNS units. Accordingly, these specifications, information, and requirements, as described in detail in this SE, may be relocated from the CTS and placed in the identified licensee-controlled documents as specified in the licensee's letter dated May 27, 1997, as supplemented by letters dated March 9, March 20, April 20, June 5, June 24, July 7, July 21, August 5, September 8, and September 15, 1998.

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

In the ITS conversion, the licensee will be relocating specifications, requirements, and detailed information from the CTS to licensee-controlled documents outside the CTS. This is discussed in Section III.D and III.E above. The facility and procedures described in the UFSAR and SLC Manual, 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 the 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 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 QA plan 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 plans for CNS and MNS and such applicable regulations as 10 CFR 50.59.

The license condition for the relocation of requirements from the CTS, discussed in Section V of this SE, will address the implementation of the ITS conversion, and will govern when relocation of the CTS requirements into licensee-controlled documents will be completed. The relocations to the UFSAR and SLC Manual may be included in the next required update of these documents in accordance with 10 CFR 50.71(e).

G. Evaluation of Other TS Changes Included in the Application for Conversion to ITS

This section addresses the beyond scope issues in which the licensee proposed changes to the CTS that differ from the corresponding requirements in the STS. The staff has provided notices of consideration for these beyond scope issues in the Federal Register. The changes discussed below are listed in the order of the applicable ITS Sections and requirements. Each evaluation is annotated with the associated DOC number as appropriate.

1. <u>Steam Generator Water Level Low-Low - Deletion of Time Constant Requirement from Channel Calibration</u>

CNS Unit 1 CTS 3/4.3.1, Table 4.3-1 Functional Unit 12, Table Notation 13
CNS Unit 1 ITS 3.3.1, Table 3.3.1-1, Function 13, SR 3.3.1.10

CNS 3.3-A.68 The CTS Channel Calibration surveillance requirement for the CNS Unit 1 steam generator water level low-low instrumentation function specifies setting the filter time constant to a value ≤ 1.5 seconds. This criterion was introduced by CNS Unit 1 Operating License Amendment No. 13 on September 30, 1986. The associated SE stated that the filter time constant was to reduce spurious reactor trips and auxiliary feedwater initiations. Despite this allowance, in its ITS submittal, the licensee stated that CNS Unit 1 currently has no filter time constant associated with this circuitry, and that the filter time constant was never implemented. Thus the licensee proposed to omit the requirement for this time constant from the ITS Channel Calibration for this instrument function, ITS SR 3.3.1.10. This change is administrative because it deletes a meaningless requirement from the CTS and does not alter how CNS Unit 1 is operated. In addition, it brings the Unit 1 Channel Calibration requirements for this function into conformity with Unit 2. Therefore, this change is acceptable.

2. Turbine Trip and Feedwater Isolation Instrumentation - Addition of T_{avg}-Low Coincident with Reactor Trip Actuation Function
MNS CTS 3/4.3.2; Tables 3.3-3, 3.4-4, and 4.3-2; Functional Unit 5
MNS ITS 3.3.2, Table 3.3.2-1 Function 5.d

MNS 3.3-M.24 The CTS 3/4.3.2 requirements for the turbine trip and feedwater isolation instrumentation function are increased to also require an initiation signal from T_{avg}-low coincident with reactor trip (P-4). This signal relationship limits an excessive reactor coolant system (RCS) cooldown following a reactor trip by terminating main feedwater flow to the steam generators. The inclusion of this initiation signal in ITS 3.3.2.5.d is acceptable because it enhances plant safety and is consistent with the plant design and safety analysis.

3. Containment Pressure Control System - Revised Action Requirements
CNS CTS 3/4.3.2, Table 3.3-3, Functional Unit 7, Action 16b.a
CNS ITS 3.3.2 Action P, Table 3.3.2-1 Function 9
MNS CTS 3/4.3.2, Table 3.3-3, Functional Unit 6, Action 26
MNS ITS 3.3.2 Action R, Table 3.3.2-1 Function 9

Background The Containment Pressure Control System (CPCS) is described in CNS UFSAR Section 7.6.4 and MNS UFSAR Section 7.6.16. It consists of two redundant trains with four differential pressure transmitters or channels per train, each channel supporting a redundant independent component or system. These systems are the containment spray system and the air return fan system. In addition, the CPCS for MNS supports the hydrogen skimmer system. In the event one of the eight channels is inoperable, CTS specify action requirements. These action requirements have been revised so that the ITS action requirements for CNS and MNS are the same.

Each CPCS instrument channel performs a start permissive/terminate function for its associated systems. The purpose of the start permissive/terminate function is to prevent excessive depressurization of the containment through inadvertent or excessive operation of certain engineered safety features such as the containment spray system. When containment pressure is below the terminate setpoint, the start/terminate function will automatically stop or prevent actuation of the associated features to protect against inadvertent actuation and the resulting negative pressure transient in the containment. The start/terminate function blocks actuation of the associated features until containment pressure has increased to the start permissive setpoint. When containment pressure is above the start permissive setpoint, the features are enabled to perform their containment protective functions; e.g., to prevent over pressurization of the containment in the event of a DBA. These instrumentation controls to block and permit actuation of the associated features are automatic, but each channel may individually be manually overridden by placing the channel in the test mode and setting the setpoint to either permit or prevent (or terminate) system operation. Selecting one precludes the other.

CNS 3.3-M.25; Discussion for CNS In the event one channel is inoperable, the CNS CTS require placing that channel in trip within 1 hour. For example, should the start permissive/terminate function for the channel be inoperable, manually placing the channel in the start permissive mode would render the terminate function for that channel unavailable. The proposed ITS action requirement does not require placing the channel in trip, an action which would disable the other safety mode of that channel. Rather, it requires immediately declaring the associated supported feature inoperable. This is a more restrictive action because the CTS would allow operation to continue indefinitely provided the channel is in trip, whereas the supported feature's action requirements, in most cases, would place a limit on unit operation. This change is acceptable because the specified action requirements associated with the LCO for the supported feature are adequate to ensure protection of the public health and safety.

In the event more than one CPCS channel is inoperable, the CNS CTS provide no action requirements; thus a unit shutdown in accordance with CTS 3.0.3 would be required. In some cases this may be overly restrictive. The proposed ITS action requirement to immediately enter the LCOs of the supported features applies even if more than one CPCS channel is inoperable. With two or more channels inoperable, the ITS may require a unit shutdown, which is consistent with the CTS. In other cases, however, the supported features' action requirements may allow operation to continue temporarily to allow time to restore the inoperable CPCS channels to Operable status. In these cases, the ITS action requirement would be less restrictive. The ITS action requirement provides adequate assurance that operation with any number of inoperable CPCS instrument channels is limited consistent with the Required Action Completion Times associated with the LCOs for the supported features. This change is acceptable because the specified action requirements associated with the LCO for the supported feature are adequate to ensure protection of the public health and safety.

MNS 3.3-L.28; Discussion for MNS In the event one CPCS channel is inoperable, the MNS CTS require placing that channel in the start permissive mode within 1 hour. If other channels become concurrently inoperable, the same action requirement applies; a shutdown in accordance with CTS 3.0.3 would not necessarily be required, which would be the case under the CNS CTS. In addition, the MNS CTS require applying the applicable action statement of the features supported by the inoperable channel. The ITS action requirement retains this action requirement but omits the CTS requirement to place the inoperable channel in the start permissive mode. This is less restrictive because it permits greater operational flexibility; in some plant conditions, it may be advantageous to place the channel in the terminate mode. The ITS actions are acceptable because they add appropriate flexibility while maintaining the level of safety afforded by the CTS action requirements.

4. Hydrogen Monitors - Deletion of Analog Channel Operational Test, Relaxation of Channel Check Frequency, and Removal of Staggered Test Requirement from Channel Calibration
CNS CTS 4.6.4.1
CNS ITS SR 3.3.3.1 and SR 3.3.3.2

CNS 3.3-L.11 CTS 4.6.4.1 for the hydrogen monitors requires a Channel Check once per 12 hours, an Analog Channel Operational Test (ACOT; COT in the ITS) once per 31 days, and a Channel Calibration every 92 days on a Staggered Test Basis. The ITS relaxed the test interval of the Channel Check to 31 days in ITS SR 3.3.3.1. This is acceptable because it is consistent with the ITS SR Frequencies established for all other post-accident monitoring (PAM) instrumentation. The ITS also omitted the staggered testing requirement from the Channel Calibration in ITS SR 3.3.3.2. This is acceptable because the hydrogen monitors do not perform a mitigative function. In addition, deleting the staggered testing requirement simplifies scheduling and will preclude missing a Channel Calibration simply because of a missed staggered test interval. Finally, the ITS omits the COT. This is acceptable because the hydrogen monitors are passive devices, do not initiate any automatic actuations, and are used only during post accident conditions. The staff agrees that the revised SRs are commensurate with the monitoring function of the hydrogen monitors. Therefore, these changes which are consistent with the STS, are acceptable.

5. Post-Accident Monitoring System Instrumentation - Revised Action Requirements
CNS CTS 3/4.3.3.6 Actions
CNS CTS 3/4.6.4.1 Actions
CNS ITS 3.3.3 Actions

CNS 3.3-L.8 CNS CTS 3/4.3.3.6 Action a and c allow 7 days to restore an inoperable channel of PAM instrumentation. Corresponding ITS 3.3.3 Actions A, B, and C relaxed this to 30 days. This change is acceptable based on operating experience and because these channels are passive and perform no actuation function. In addition, the remaining operable channels, the remaining operable diverse variable, or alternate monitoring method will ensure adequate monitoring of plant conditions following an accident.

CNS 3.3-L.9 CNS CTS 3/4.3.3.6 Action a and 3/4.6.4.1 Action a require a unit shutdown when one required PAM channel is inoperable and the actions cannot be completed within the allowed time. ITS 3.3.3 Action D replaces the shutdown requirement with a requirement to immediately initiate action in accordance with ITS 5.6.7, "PAM Report." This change will allow continued operation in this condition for functions with two required channels and for those with one required channel if the associated diverse channel or alternate monitoring method is operable, provided a special report is written to the NRC within 14 days detailing planned corrective actions. This change is acceptable because with either a remaining operable channel, or a diverse operable channel, the monitoring function is not lost.

In the event one channel of the containment area radiation monitor or reactor coolant radiation level monitor is inoperable and the alternate monitoring method is also inoperable, the CTS would require a unit shutdown in accordance with CNS CTS 3.0.3 because CNS CTS 3/4.3.3.6 does not specify an action requirement for this specific condition. The ITS addresses this situation for PAM radiation monitoring instrumentation by requiring, in ITS 3.3.3 Action D, that if one of the inoperable channels cannot be restored to operable status within 7 days a special report would be prepared and submitted to the NRC within 14 days. This is consistent with the STS and is acceptable for the reasons given above.

CNS 3.3-L.10 CNS CTS 3/4.3.3.6 Action b requires a unit shutdown if the minimum number of operable PAM channels cannot be restored within 48 hours. The ITS relaxes this Completion Time to 7 days in ITS 3.3.3 Actions E and F. This change is acceptable based on the low probability of an event requiring PAM instrument operation and the availability of alternate means to obtain the required information.

6. Reactor Coolant System (RCS) Low Temperature Overpressure Protection (LTOP) System - Addition of Allowance to Operate Two Charging Pumps Concurrently
MNS CTS 3/4.4.9.3 Action a and Footnote *
MNS ITS 3.4.12 Required Action A.4

MNS 3.4-L.26 In the event two or more centrifugal charging pumps or two or more safety injection pumps are capable of injecting into the RCS when LTOP is required, CTS 3/4.4.9.3 Action a requires immediately reducing the number of capable pumps to the number allowed by CTS 3.4.9.3. However, Footnote * to CTS Action a specifies an exception to this action for the condition of two centrifugal charging pumps being

capable. This exception permits two capable centrifugal charging pumps when two power-operated relief valves (PORVs) are secured open with block valves open with their power removed. ITS 3.4.12 Action A also permits this allowance for two capable charging pumps for the additional alternative condition in Required Action A.4 that the RCS is depressurized and an RCS vent of greater than or equal to 4.5 square inches is established. This change is acceptable because the vent size was evaluated in the MNS low-temperature overpressure protection analysis and is approximated by the two open PORVs. That is, with two capable charging pumps, the level of overpressure protection afforded by a vented and depressurized RCS is equivalent to that provided by two PORVs with open de-energized block valves.

7. Reactor Coolant System Leakage Detection Instrumentation - Revised Action Requirements
CNS and MNS CTS 3/4.4.6.1 Actions
CNS and MNS ITS 3.4.15 Actions

The staff reviewed CNS and MNS's proposed ITS 3.4.15 which is based on STS 3.4.15, "Reactor Coolant System Leakage Detection Instrumentation," for changes to CNS and MNS CTS 3/4.4.6.1 that are also deviations from the STS. A change to the LCO and action requirements for an inoperable containment atmosphere radioactivity monitor (gaseous or particulate for CNS; gaseous for MNS) satisfied this description.

Background (CNS and MNS 3.4-A.1 and CNS 3.4-A.41) ITS 3.4.15 differs from the STS to reflect plant-specific system names, which include changing the STS's "containment sump level monitor" to the ITS's "containment floor and equipment sump level monitor," and changing the STS's "containment air cooler condensate flow rate monitor" to the ITS's "containment ventilation condensate drain tank (CVCDT) level monitor." Also, the CNS CTS 3.4.6.1 requirement for the Operability of containment sump discharge flow monitor was not retained because the actual system monitors level changes, not flow rate. The staff found that these deviations from the STS terminology were acceptable because they are consistent with existing CNS and MNS terminology and leak detection system design.

CNS and MNS 3.4-L.17 In the event a containment atmosphere radioactivity monitor (gaseous or particulate for CNS; gaseous for MNS) is inoperable, CTS 3/4.4.6.1 Action allows continued plant operation for 30 days provided grab samples of the containment atmosphere are taken and analyzed every 24 hours. For this condition, CNS and MNS ITS 3.4.15, in Required Action B.1, retain the requirement for daily grab samples of the containment atmosphere, but add the option in Required Action B.2, consistent with the STS, to instead perform an RCS inventory balance every 24 hours. This added flexibility is acceptable because both methods provide an effective mechanism to detect RCS leakage. This part of the change to the CTS action requirements, however, is within the scope of the ITS conversion.

CNS and MNS ITS 3.4.15 Action B differs from the STS and the CTS because it does not require restoring the inoperable monitor within 30 days. In addition, the ITS does not adopt the STS's option to verify the Operability of the CVCDT level monitor within 30 days. Omitting these two STS action requirements is beyond the scope of the ITS conversion. The ITS omit these action requirements because they provide no additional limitation beyond that imposed by the other Actions of ITS 3.4.15, all of which are consistent with the STS action requirements.

Discussion for CNS In the STS, if the CVCDT level monitor is Operable, then the second optional action requirement would be taken, and operation of the unit could continue indefinitely. If the CVCDT level monitor is not operable, however, then this action requirement to verify the Operability of the CVCDT level monitor within 30 days is unnecessary. In addition, CNS ITS 3.4.15 Action D already addresses the condition of both the containment atmosphere radioactivity monitor (gaseous or particulate) and the CVCDT level monitor being inoperable. This Action requires restoring one of these monitors within 30 days. Thus, the 30-day requirement, when it would apply, is contained in the ITS action requirements without including it in CNS ITS 3.4.15 Action B.

Discussion for MNS In the STS, if the CVCDT level monitor is Operable, then the second optional action requirement would be taken, and operation of the unit could continue indefinitely. If the CVCDT level monitor is not operable, however, then this action requirement to verify the Operability of the CVCDT level monitor within 30 days is unnecessary because the containment floor and equipment sump monitor and the containment atmosphere particulate monitor would be available to monitor leakage. In addition, if the containment atmosphere particulate monitor is also inoperable, MNS ITS 3.4.15 Action C would require restoring one of these monitors within 30 days. Thus, the 30-day requirement, when it would apply, is contained in the ITS action requirements without including it in MNS ITS 3.4.15 Action B.

Therefore, as long as the CVCDT level monitor is Operable and either a containment grab sample is obtained and analyzed or an RCS inventory balance is performed daily, ITS 3.4.15 Action B will allow plant operation to continue indefinitely with an inoperable containment atmosphere radioactivity monitor (gaseous or particulate for CNS; gaseous for MNS). This is acceptable because diverse indication of RCS leakage is maintained by the CVCDT level monitor and the containment floor and equipment sump monitor, and for MNS, the containment atmosphere particulate monitor. Based on the above, the staff finds that ITS 3.4.15 Action B for CNS and MNS is acceptable.

8. Accumulator Isolation Valves - Revised Pressure Limit for Removing Power
CNS and MNS CTS 4.5.1.1.c
CNS and MNS ITS SR 3.5.1.5

CNS and MNS 3.5-M.2 CTS 4.5.1.1.c requires that the power be removed from the accumulator isolation valves when reactor coolant system pressure is greater than 2000 psig. Removal of power will ensure that the accumulators are not isolated from

the RCS, and can inject coolant into the RCS when the conditions exist. Corresponding ITS SR 3.5.1.5 specifies a more restrictive pressure threshold of 1000 pounds per square inch guage (psig). The licensee cited Westinghouse Nuclear Safety Advisory Letter (NSAL) 97-003 to support this change. NSAL 97-003 addresses operating bypasses and compliance with IEEE 279-1971. The revised pressure setpoint is consistent with the operability assumptions described in the NSAL for a LOCA while shutdown, and is also consistent with existing practice. Therefore, the staff finds this change acceptable.

9. Refueling Water Storage Tank (RWST) - Deletion of Outside Air Temperature Condition for Performing RWST Temperature Verification Surveillance
CNS and MNS CTS 4.5.4.b
CNS and MNS ITS SR 3.5.4.1

CNS and MNS 3.5-M.3 Every 24 hours, CTS 4.5.4.b requires verifying that the refueling water storage tank (RWST) temperature is within the range 70 °F to 100 °F "when the outside air temperature is less than 70°F or greater than 100°F." This SR is retained as ITS SR 3.5.4.1. The ambient temperature condition is deleted so that the daily requirement to monitor the RWST temperature applies without regard to the ambient temperature. Under the current Section 4.5.4.b, licensee personnel have to verify the outside temperature every 24 hours, and determine if there is any need to verify RWST water temperature; under the proposed SR 3.5.4.1, personnel simply verify the RWST temperature every 24 hours regardless of outside ambient temperature. This proposed change is acceptable because it increases the monitoring of RWST temperature to whenever the RWST is required to be Operable.

10. Hydrogen Mitigation System - Revised Minimum Number of Required Hydrogen Igniters
MNS CTS 4.6.4.3.a
MNS ITS SR 3.6.9.1

MNS 3.6-A.37 CTS 4.6.4.3.a requires that 32 of 33 hydrogen igniters be operable on each train. Corresponding ITS SR 3.6.9.1 requires 34 igniters per train to be operable. The actual design contains 35 igniters per train. This change is administrative because it corrects an inadvertent error in the CTS and is consistent with current operation of the system. The correct number of igniters was increased as discussed in MNS SER Supplement 7, Attachment C, after the first refueling outage of each unit. This change corrects the TS with the approved licensing basis as described in the SER supplement. Therefore this change is acceptable.

11. Ice Bed - Relaxation of SR Frequency to Verify Boron Concentration and pH
CNS and MNS CTS 4.6.5.1.b.1
CNS and MNS ITS SR 3.6.12.3

Background The boron in the ice of the ice bed is used to reduce the volatility of radioiodines and to ensure that the overall boron concentration in the sump is not diluted

during the ice melt following a design basis loss of coolant accident. The pH of the ice facilitates removal of radioiodines and minimizes corrosion within containment during the recirculation phase of a design basis loss of coolant accident.

CNS 3.6-L.26 CTS 4.6.5.1.b.1 requires verifying that the boron concentration and pH of the ice bed is within limits once per 9 months, which is the test interval given in the STS. Corresponding ITS SR 3.6.12.3 increases the surveillance interval to 18 months. Sampling of the ice baskets is performed at random by sampling the top few feet after removing a few inches of ice from the top of the basket. Data from past sampling of the ice beds indicates that there have been few failures for this surveillance. The boron in the ice is in the form of sodium tetra borate (a salt), and is not volatile even though the ice itself may sublimate. As a result, not only would the boron concentration not decrease, it will increase in inverse proportion to the quantity of ice remaining. This was demonstrated by past surveillance data, showing that the boron concentration associated pH routinely met the acceptance criteria (specified in CTS 3.6.5.1.a and retained in ITS SR 3.6.12.3). Accordingly, the SR Frequency may be relaxed to once per 18 months, consistent with the frequency of refueling outages. A benefit of this relaxation is that it will reduce the number of routine containment entries during power operation. This relaxation is acceptable because of the favorable surveillance record and the tendency of the ice bed boron concentration to increase over time.

MNS 3.6-L.26 CTS 4.6.5.1.b.1 requires verifying the boron concentration and pH of the ice bed is within limits once per 9 months, which is the test interval given in the STS. Corresponding ITS SR 3.6.12.3 increases the surveillance interval to 18 months. Sampling of the ice baskets is performed at random by sampling the top few feet after removing a few inches of ice from the top of the basket. Data from boron sampling in the ice beds indicates that there have been few failures for this surveillance since 1986.

The early failures before 1986 at MNS were attributed to the initial ice loading or ice makeup techniques in use at that time. During the initial years of operation, ice sublimation rates were higher than expected and several methods were used to increase the ice basket weight. These included reloading with fresh flake ice, reloading with ice blocks formed from a borax solution in molds, and the direct addition of borax to the baskets. As a result, effective sampling for these baskets during this time frame was difficult because the sample may not have been representative. The data reviewed for a 10-year period (1986 to 1996) indicate that of the over 500 baskets sampled, 26 had concentrations less than 1800 ppm, and that 7 of these 26 baskets were reloaded, and the remaining baskets were averaged with the other baskets.

The boron in the ice is in the form of sodium tetra borate (a salt), and is not volatile even though the ice itself may sublimate. As a result, not only would the boron concentration not decrease, it will increase in inverse proportion to the quantity of ice remaining. This was demonstrated by past surveillance data, showing that the boron concentration and associated pH routinely met the acceptance criteria (specified in CTS 3.6.5.1.a and retained in ITS SR 3.6.12.3), except as noted above. Accordingly, the SR Frequency

may be relaxed to once per 18 months, consistent with the frequency of refueling outages. A benefit of this relaxation is that it will reduce the number of routine containment entries during power operation. This relaxation is acceptable because of the favorable surveillance record of recent years and the tendency of the ice bed boron concentration to increase over time.

12. Containment Valve Injection Water System - Deletion of Surge Tank Water Supply Requirement and Reduction of Required Seal Injection Flow Rate
CNS CTS 4.6.6.1 and 4.6.6.2
CNS ITS SR 3.6.17.1 and SR 3.6.17.2

Background The containment valve injection water system prevents leakage of containment atmosphere past certain gate valves used for containment isolation following a LOCA by injecting seal water at a pressure exceeding containment pressure between two seating surfaces of the flex edge valves as described in CNS UFSAR Section 6.2.4.2.2.

CNS 3.6-L.23 CTS 4.6.6.1 requires verification every 31 days that the surge tanks of the system have a 30-day supply of water. Corresponding ITS SR 3.6.17.1 omits this requirement because the nuclear service water system (NSWS) is the assured automatic source of water after a LOCA. The NSWS is designed for long-term (30-day) cooling. Therefore, it is not necessary to specifically require this to be verified on a monthly basis. Thus, the supply of water is assured with or without the surveillance requirement. Therefore, deletion of the surge tank water supply requirement from this surveillance is acceptable.

CTS 4.6.6.2 requires verifying once per 18 months that system pressure is ≥ 45 psig, and that the system flow rate is less than 1.7 gpm for Train A and 1.4 gpm for Train B with a tank pressure ≥ 45 psig. These criteria are based on two NSWS pumps in operation. The ITS criteria are based on a single NSWS pump in operation. Specifically, corresponding ITS SR 3.6.17.2 requires a flow rate to be less than 1.29 gpm for Train A and less than 1.16 gpm for Train B with a surge tank pressure ≥ 36.4 psig. In its submittal, the licensee stated that at this lower surge tank pressure, the pressure at the valve with the greatest system head loss from the surge tank is ≥ 16.2 psig, which is 110 percent of peak containment pressure following a LOCA. Thus, specifying the required system pressure with a surge tank pressure of ≥ 36.4 psig is equivalent to specifying a system pressure of ≥ 16.2 psig. These changes in surveillance requirement acceptance criteria are acceptable because they are adequate to ensure that the containment valve injection water system will perform its containment isolation function following a design basis LOCA.

13. Main Steam Safety Valves (MSSVs) - Revised Action Requirements
CNS CTS 3/4.7.1.1 Action a and Table 3.7-1
CNS ITS 3.7.1 Action A and Table 3.7.1-1

Background The main steam safety valves are code safety valves (five associated with each of the four steam generators) and ensure that the secondary system pressure will be limited to within 110 percent (1304 psig) of its design pressure of 1185 psig during the most severe anticipated system operational transient. Each valve provides 20 percent of the relieving capacity. CNS CTS 3/4.7.11 allows plant operation during the operational conditions of Hot Standby, Startup, and Power Operation (Modes 3, 2, and 1) with some of these valves inoperable provided the steam flow and thermal power are limited. The staff transmitted Westinghouse's NSAL 94-001 to licensees by Information Notice 94-60, dated August 22, 1994. NSAL 94-001 recommended reducing the existing limits on thermal power.

CNS 3.7-M21 CNS CTS 3/4.7.1.1 Action a references Table 3.7-1, to specify the maximum allowable power range neutron flux high setpoints (percent of reactor rated thermal power) as 87, 65, 43 for 4, 3, 2 code safety valves operable, respectively, on a steam generator. In response to a recommendation received from the nuclear steam supply system (NSSS) vendor Westinghouse in NSAL 94-001, the licensee proposed to reduce the setpoints to 58, 41, 24 for 4, 3, 2 code safety valves operable, respectively. These new setpoints were calculated using the formula provided in NSAL 94-001, and will replace the old setpoints in corresponding CNS ITS Table 3.7.1-1. This change is acceptable because it reduces the setpoints in a conservative direction, and provides additional safety margin.

14. Diesel Generator Starting Air - Revised Action and Surveillance Requirements
MNS CTS 4.8.1.1.2.e.15
MNS ITS 3.8.3 Action D and SR 3.8.3.3

MNS 3.8-L.11 CTS 4.8.1.1.2.e.15 requires that at least every 18 months each diesel generator be started at least 2 times with the air start receivers pressurized to $\leq$ 220 psig. The ITS replaced this SR with a requirement to verify every 31 days that the pressure in each diesel generator air start receiver is $\geq$ 210 psig. This change is overall considered less restrictive because of the reduction in the minimum pressure (220 to 210 psig) and the deletion of the two-start test at the minimum required pressure, even though the pressure must be verified monthly. These changes are appropriate because the air start receivers have been verified to be capable of starting the diesel generators at the lower pressure and the design basis of the system is still met at the lower pressure. The elimination of the 18-month successive two-start verification test is also appropriate because adequate diesel generator start testing is provided by the SRs of ITS 3.8.1, AC Sources-Operating and ITS 3.8.2, AC Sources-Shutdown; thus the two-start SR is unnecessary. The proposed changes are acceptable because they add reasonable flexibility and eliminate unnecessary diesel generator starts while maintaining adequate assurance of air start system operability.

MNS 3.8-L.19 In the event air receiver pressure is below the criteria of CTS 4.8.1.1.2.e.15, CTS would require declaring the associated diesel generator inoperable, and entering the appropriate action requirement of CTS 3/4.8.1.1. If only one diesel

were inoperable, then CTS Actions c and d would have to be taken. For the condition of low pressure in the air start system, ITS 3.8.3 Action D contains less restrictive action requirements. In the event one or more diesel generators have one of two starting air receiver pressures < 210 psig, then Required Action D.1 requires immediately initiating action to isolate the affected receiver, and Required Action D.2 requires restoring both receivers to ≥ 210 psig within 48 hours. Otherwise, Action E requires declaring the associated diesel generator inoperable. Allowing 48 hours before declaring the diesel generator inoperable is less restrictive. The CTS, as discussed above, and corresponding STS 3.8.3 Action E would require immediately declaring the affected diesel generator inoperable with either air start receiver pressure less than required pressure, recognizing no redundancy in the air receivers. The ITS action requirement is acceptable because they reflect the actual design of the air starting system, which has more redundancy that the air start system assumed in the STS. The 48-hour Completion Time for restoring air pressure in the degraded air receiver is acceptable because (1) the degraded air receiver will be isolated, (2) the second air receiver with a pressure ≥ 210 psig is adequate to support the Operability of the diesel generator (one receiver at the minimum pressure is capable of supporting five starts), and (3) the probability of an event requiring a start of the diesel generator during the 48-hour period is small.

15. Inverters - Operating - Deletion of Unnecessary Allowance to Disconnect an Inverter from its DC Source During a Battery Equalizing Charge
CNS CTS 3.8.3.1.e, h, I, and j; and Footnote *
CNS ITS LCO 3.8.7
STS LCO 3.8.7 Note

CNS 3.8-A.65 Footnote * to CTS 3.8.3.1 for the onsite electrical power distribution states that an inverter may be disconnected from its dc source (battery and battery charger) for up to 24 hours during a battery equalizing charge. This is allowed provided the associated ac vital bus is operable and energized and the three other ac vital buses are operable and energized from their associated inverters and connected to their associated dc bus. A Note in corresponding STS LCO 3.8.7 contains this same allowance. However, CNS ITS LCO 3.8.7 omits this note. In its submittal, the licensee stated that during a battery equalizing charge at CNS the inverter remains connected to the required dc source with a qualified battery and battery charger; thus, the allowance provided by the footnote is not needed and has never been used. Thus, deletion of this unnecessary allowance is an administrative change, and is acceptable because the ITS retains the CTS limitations on the operability and testing of inverters.

16. Boron Dilution Mitigation System - Addition of Allowance to Block Automatic Actuation
CNS CTS 3/4.9.2.1
CNS ITS 3.9.2

Background The boron dilution mitigation system (BDMS) is described in Section 7.6.23.1 of the CNS UFSAR. Its function is to protect the reactor from an inadvertent criticality by automatically stopping the flow of unborated water. It also provides an alarm to indicate increasing neutron count rate. CNS CTS 3/4.9.2.1 contains operability, action , and testing requirements for the BDMS during the operational condition of Refueling, Mode 6.

CNS 3.9-L.10 The licensee proposed to add a note which specifies that automatic actuation of the BDMS may be blocked during core reloading until two fuel assemblies are loaded into the core. During refueling, when the first two assemblies are seated, the background count rate increases significantly. These two assemblies provide the base background count rate for setting the actuation setpoint. Without the proposed note, conditions could exist leading to inadvertent BDMS actuation without an actual safety concern (inadvertent criticality cannot occur with only one fuel assembly). Using the allowance of the proposed note, the BDMS indications remain operable and provide adequate monitoring information to the operators. Thus the proposed note provides increased flexibility to operations without increasing the risk of an undetected boron dilution event. On the preceding basis, this allowance, which is not contained in the STS, is acceptable for CNS.

17. Diesel Fuel Oil Testing Program - Relaxation of Particulate Contamination Test
CNS CTS 4.8.1.1.2.f
MNS CTS 4.8.1.1.2.d
CNS and MNS ITS 5.5.13.c

CNS and MNS 5.0-L.10 CNS CTS 4.8.1.1.2.f and MNS CTS 4.8.1.1.2.d require that diesel generator fuel oil particulate contamination be verified in accordance with the industry standard, ASTM-D2276-78, Method A. Corresponding ITS 5.5.13.c requires that particulate contamination be verified based on ASTM-D2276, Method A, which is less restrictive. This change in reference will require testing for particulate contamination using the same overall test concept, but will allow using a larger, 3-micron particulate filter. The ASTM-D2276-78 standard, originally intended for jet fuel, requires that testing be conducted with a much finer, 0.8-micron filter. The filter installed within the diesel generator is a 5-micron filter; thus any contaminant that could clog the 5-micron filter would be detected by the 3-micron test filter. This change is acceptable because particulate contaminants will continue to be detected in accordance with an appropriate industry standard, and because the increased size of particles allowed in the diesel fuel oil will not adversely affect the performance of the diesel generators.

IV. COMMITMENTS RELIED UPON

In reviewing the proposed ITS conversions for CNS and MNS, the staff has relied upon the licensee commitment to relocate certain requirements from the CTS to licensee-controlled documents as described in Table LA and Table R attached to this SE. These tables reflect the relocations described in the licensee's submittals on the conversion. The licensee has been

requested to propose a license condition to make this commitment enforceable. Such a commitment from the licensee is important to the ITS conversion because the acceptability of removing certain requirements from the TS is based on those requirements being relocated to licensee-controlled documents where further changes to the requirements will be controlled by the regulations (e.g., in accordance with 10 CFR 50.59). See Section V for details.

V. LICENSE CONDITIONS

In its application of May 27, 1997, the licensee discussed the problems with the first performance of the SRs in the ITS that will be new or revised compared to the SRs in the CTS. Accordingly, the staff communicated to the licensee, in its letter of August 11, 1998, that the licensee should propose a license condition in this regard, and that the following guidelines would be used to evaluate the proposed license condition:

- 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.

- 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.

- 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 date of implementation of this amendment.

- 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 the implementation of this amendment.

In its September 8, 1998, letter, the licensee proposed a new license condition to each operating license. In its September 15, 1998 letter, the licensee revised the proposed wording as follows:

> "For Surveillance Requirements (SRs) that are new in Amendment [ ] to Facility Operating License [ ], the first performance is due at the end of the first surveillance interval that begins at implementation of Amendment [ ]. For SRs that existed prior to Amendment [ ], including SRs with modified acceptance criteria and SRs whose intervals of performance is (sic) being extended, the first performance is due at the end of the first surveillance interval that begins on the date the Surveillance was last performed prior to implementation of Amendment [ ]. For SRs that existed prior to Amendment [ ], whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of Amendment [ ]."

The staff has reviewed the proposed schedule regarding SRs and finds it meet the guideline communicated in its August 11, 1998, correspondence and is, thus, acceptable.

In its letters of September 8 and 15, 1998, which are in response to the staff's comment conveyed in its August 11, 1998, letter, the licensee also proposed a license condition that will enforce the relocation of requirements from the CTS to licensee-controlled documents. The relocations are provided in Table LA, Removal of Information from the Current Technical Specifications, and Table R, Relocated Current Technical Specifications. The license condition states that the relocations would be completed during the implementation of the ITS and within 90 days of the issuance of this amendment for MNS, and by January 31, 1999, for CNS. This schedule is reasonable in consideration of the large volume of site-specific work necessary to complete implementation of the amendments. Therefore, the staff finds that the proposed schedule for implementation of the ITS for MNS and CNS and the completion of the relocation of current TS requirements acceptable.

VI. STATE CONSULTATION

In accordance with the Commission's regulations, the North Carolina and South Carolina State officials, Messrs. John James and Virgil Autrey, respectively, were notified of the proposed issuance of the ITS conversion amendments for the CNS Units 1 and 2 and MNS Units 1 and 2. The State officials had no comments.

VII. ENVIRONMENTAL CONSIDERATION

Pursuant to 10 CFR 51.21, 51.32, and 51.35, environmental assessments and findings of no significant impact were published in the Federal Register on September 14, 1998 (63 FR 49139) and September 28, 1998 (63 FR 51626) for the proposed conversion from the CTS to the ITS within the scope of NUREG-1431. Accordingly, based upon the environmental assessments, the Commission has determined that the portions of these amendments covering issues within the scope of NUREG-1431 will not have a significant effect on the quality of the human environment.

Included in these amendments are also changes that are beyond the scope of NUREG-1431. These changes are discussed in Section III.G of this SE. These beyond-scope items change requirements with respect to installation or use of facility components located within the restricted area as defined in 10 CFR Part 20 and change surveillance requirements. The NRC staff has determined that the amendments involve 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 proposed findings that the amendments involve no significant hazards consideration, and there has been no public comment on such findings (for Catawba: 63 FR 25106, 63 FR 27760, 63 FR 40553; for McGuire: 63 FR 25107, 63 FR 25108 (two separate notices), 63 FR 27761, 63 FR 40554, 63 FR 45524). Accordingly, the amendments meet 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 beyond-scope changes included in the CNS and MNS amendments.

VIII. CONCLUSION

The CNS and MNS ITS provide clearer, more readily understandable requirements to ensure safer operation of the stations. The NRC staff concludes that the ITS satisfy the guidance in the Commission's Final Policy Statement with regard to the content of TS, and conform to the STS provided in NUREG-1431 with appropriate modifications for plant-specific considerations. The NRC staff further concludes that the ITS satisfy Section 182a of the Act, 10 CFR 50.36, and other applicable standards. On this basis, the NRC staff concludes that the proposed ITS for Catawba and McGuire are acceptable.

The staff has also reviewed the plant-specific changes to the CTS as described in this SE. 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.

Attachments:

1. Table A - Administrative Changes
2. Table M - More Restrictive Changes
3. Table L - Less Restrictive Changes
4. Table LA - Removal of Information from the CTS
5. Table R - Relocated Specifications

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Date: September 30, 1998

TABLE A - ADMINISTRATIVE CHANGES
SECTION 1.0 USE AND APPLICATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
1.0 A.1	The CTS has been reformatted and renumbered in accordance with NUREG-1431. As a result, the Technical Specifications are more readily readable, and therefore understandable, by plant operators as well as other users. The reformatting, renumbering, and rewording process serves only to clarify the CTS requirements and involves no technical changes to the CTS.	1.0	1.0
1.0 A.2	CTS instrument calibration definitions have been revised to add the word "required" to describe the alarm and sensor functions specified in the definition. As a requirement for OPERABILITY of a Technical Specification channel, not all channels have a "required" sensor or alarm. Therefore, the revised wording more accurately describes the intent of the CTS definitions and clarifies the CTS requirement.	1.1	1.3, 1.5, and 1.37
1.0 A.3	Not used.		
1.0 A.4	Addition of detail to the CTS definition of CHANNEL CALIBRATION to clarify current practice for calibrating instrumentation channels with thermocouple or RTD sensing elements. For most channels, a CHANNEL CALIBRATION includes adjustments to the sensor to reestablish proper input/output relationships. RTDs and thermocouples are designed to have a fixed input/output response which cannot be adjusted or changed once installed. For these types of sensors, the appropriate calibration is a verification of OPERABILITY of the sensing element and a calibration of the remaining adjustable devices in the channel.	1.1	1.5
1.0 A.5	The CTS definitions of CONTAINMENT INTEGRITY and REACTOR BUILDING INTEGRITY have been deleted. The change is administrative because all requirements contained within these definitions are redundant to the requirements specified in ITS Section 3.6, Containment Systems.	1.1	1.7, 1.27

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 1.0 USE AND APPLICATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
1.0 A.6	The CTS definitions of CONTROLLED LEAKAGE, IDENTIFIED LEAKAGE, PRESSURE BOUNDARY LEAKAGE, and UNIDENTIFIED LEAKAGE have been incorporated into a single ITS defined term, LEAKAGE. The definition of each category of leakage, and its use in the applicable ITS specifications, is consistent with the CTS definition and does not alter the method in which leakage is accounted. This change is administrative because it only reformats the CTS leakage definitions.	1.1	1.8, 1.15, 1.22, 1.38
1.0 A.7	The CTS definition of CORE ALTERATION has been revised to eliminate the word "conservative" from the allowance to complete the specific move in progress. When CORE ALTERATION are required to be suspended, it is known that a specific movement may have to be completed. The CTS requirement to complete the move conservatively was replaced by the requirement in the ITS to establish a "safe" position. The ITS requirement of "safe" provides an equivalent control for the allowance to complete the move.	1.1	1.9
1.0 A.8	The CTS definitions for the response times of enginered safety features and the reactor trip system have been expanded to include an explicit allowance to measure response times by means of a series of sequential, overlapping or total steps so that the entire response time is measured. The allowance provided by the corresponding ITS definitions is consistent with current plant interpretation and practices, as well as being consistent with the specific guidance provided in IEEE 338-1977, Section 6.3.4, "Response Time Verification Tests." This change clarifies the CTS requirement for response time testing and does not result in a change to the existing plant practice.	1.1	1.13 and 1.28
1.0 A.9	The CTS definition of E-Bar has been revised to be consistent with the notation to CTS Table 4.4-4 for RCS Specific Activity. This revision does not affect how the current definition is applied and only provides a more complete and consistent reference within the definition.	1.1	1.12
1.0 A.10	The CTS definition of REPORTABLE EVENT was deleted. This definition simply refers to the conditions specified in 10 CFR 50.72 and 50.73 which are directly enforceable. Therefore, this definition is not required within the TS.	1.1	1.29

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 1.0 USE AND APPLICATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
1.0 A.11	The CTS definition of OFFSITE DOSE CALCULATION MANUAL has been moved to the Administrative Controls section of the TS. Any technical changes to the definition is addressed in the Discussion of Changes associated with ITS Administrative Controls section.	5.5.1	1.18
1.0 A.12	The CTS electrical power requirement in the CTS definition of OPERABILITY was clarified to explicitly state "normal or emergency electrical power." The intent of the CTS language "necessary...electrical power" is to only require one source of power for a feature to be OPERABLE. Similarly, the CTS language "specified function" was replaced with "specified safety function(s)" to clarify that OPERABILITY does not encompass any non-safety functions a system may also perform.	1.1	1.19
1.0 A.13	The CTS definition of MODE was clarified to include "with fuel in the reactor vessel." This is editorial in nature since the statement was already included in CTS Table 1.2 which defined Operational Modes. Therefore, the ITS definition of MODE is equivalent to CTS requirements.	1.1	1.20
1.0 A.14	Not used.		
1.0 A.15	In the event one excore detector is inoperable, the CTS definition of QUADRANT POWER TILT RATIO (QPTR) requires computing QPTR using the three remaining excore detectors to compute the average detector output. This requirement is retained as a note in ITS SR 3.2.4.1 to determine the QPTR.	SR 3.2.4.1 Note	1.25
1.0 A.16	In the determination of SHUTDOWN MARGIN (SDM), CTS 4.1.1.1 and 4.1.1.2 require accounting for the reactivity worth of any rod cluster control assemblies (RCCAs) which are not capable of being fully inserted. This requirement is retained in the ITS definiton of SDM, consistent with the STS. In addition, the CTS definition of SDM is clarified consistent with the STS and current practice to specify using nominal zero power level values for fuel and moderator temperatures to calculate SDM during operation in MODES 1 and 2.	1.1	1.30 4.1.1.1 4.1.1.2

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 1.0 USE AND APPLICATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
1.0 A.17	The CTS definition of STAGGERED TEST BASIS is modified to be consistent with its usage throughout the ITS. The intent of the frequency of testing components on a STAGGERED TEST BASIS is not changed. The ITS 1.1 definition allows specifying staggered test intervals for applicable ITS SRs in the SR Frequency column, independent of the number of subsystems. The modification of the definition does not involve any technical changes to the staggered intervals specified in the CTS and only affects the presentation of this information.	1.1	1.35
1.0 A.18	The CTS definition of FREQUENCY NOTATION and associated CTS Table have been deleted since the abbreviations in the CTS Table are no longer used within the ITS. The CTS FREQUENCY NOTATIONS are replaced in the ITS by the direct specification of all frequencies without the use of "Notations".	1.1	1.14, Table 1.1
1.0 A.19	The note in CTS Table 1.2 that helps define MODE 6, Refueling, is revised to delete the phrase "with the head removed." This change is administrative because this note also describes Mode 6 with the bounding phrase "with the head closure bolts less than fully tensioned." The vessel head can only be removed if the head closure bolts are less than fully tensioned. Thus MODE 6 may be defined without the phrase "or with the head removed."	Table 1.1-1 Note c	Table 1.2 Note **
1.0 A.20	The ITS contains three new sections, 1.2 - Logical Connectors, 1.3 - Completion Times, and 1.4 - Frequency, to ensure consistent understanding and use of the ITS format and presentation style. These new sections do not change any CTS operational restrictions or limits. Their addition is, therefore, an administrative change.	1.2, 1.3, and 1.4	1.0

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 1.0 USE AND APPLICATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
1.0 A.21	The average reactor coolant temperature threshold for MODES 1 and 2 specified in CTS Table 1.2 was changed to NA (not applicable) in corresponding ITS Table 1.1-1. In the ITS, individual specification applicability statements specify the applicable average reactor coolant temperature limits in MODES 1 and 2. In particular, the 350°F MODE 1 and 2 temperature specified in the CTS table is unnecessary because the minimum required reactor coolant temperature for MODES 1 and 2 is specified in the appropriate ITS Section 3.4 specifications. The ITS definitions for MODES 1 and 2 retain the CTS theshold values of reactivity (K_{eff}) and thermal power level. These thresholds are the principal basis for the applicability of CTS requirements in MODES 1 and 2. Therefore, specifying reactor coolant temperature boundaries in the applicability statements of only those ITS specifications that require it, and omiting it from the ITS definitions for MODES 1 and 2 is an administrative change.	Table 1.1-1	Table 1.2
1.0 A.22	The definitions of Hot Shutdown (MODE 4) and Cold Shutdown (MODE 5) in CTS Table 1.2 are clarited for completeness to preclude misinterpretation. Specifically, a note was added to specify that these Modes require "all reactor vessel head closure bolts fully tensioned." The addition of this note is an administrative change because it eliminates a potential overlap in defined operational modes and reflects actual industry practice.	Table 1.1-1 Note b	Table 1.2
1.0 A.23	The definition of REFUELING (MODE 6) in CTS Table 1.2 was changed to remove the 140°F upper limit on average reactor coolant temperature. When the average coolant temperature exceeded 140°F, the CTS could be misinterpreted as not requiring the application of TS requirements that are needed when the reactor vessel head bolts are not fully tensioned. Removing the temperature reference will ensure observance of the MODE 6 TS requirements should the average coolant temperature exceed 140°F. This change is administrative because it makes clear the intent of the CTS and is consistent with current practice.	Table 1.1-1	Table 1.2

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 1.0 USE AND APPLICATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
1.0 A.24	The CTS definition of CHANNEL CALIBRATION was revised to include calibration of required displays. The majority of CTS channels which require a calibration are those that perform trip or actuation functions and do not have a "required" display function. However, CTS 4.3.3.6 requires a calibration of the post accident monitoring channels. The safety function performed by these channels is a display function only. Therefore, the inclusion of required displays within the ITS definition of CHANNEL CALIBRATION is an administrative change because it is consistent with the CTS calibration requirements for the post accident monitoring system instrumentation channels and with current practice.	1.1	1.5

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 2.0 SAFETY LIMITS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
2.0 A.1	The CTS have been reformatted and renumbered in accordance with NUREG-1431. As a result, the Technical Specifications are more readily readable, and therefore understandable, by plant operators as well as other users. The reformatting, renumbering, and rewording process serves only to clarify the CTS requirements and involves no technical changes to the CTS.	Section 2.0	Section 2.0
2.0 A.2	The requirements of CTS Section 2.2, "Limiting Safety System Settings - Reactor Trip System Instrumentation Setpoints," and the trip setpoints and allowable values in associated CTS Table 2.2-1 are moved to ITS 3.3.1, "Reactor Trip System (RTS) Instrumentation," and associated ITS Table 3.3.1-1. Movement of these requirements within the TS is an administrative change because it is a change in presentation that does not modify the current technical requirements. Any specific technical or administrative changes to these requirements are addressed under changes related to RTS requirements in ITS Section 3.3.	3.3.1 and Table 3.3.1-1	2.2 and Table 2.2-1
2.0 A.3	The CTS action requirements to comply with CTS 6.7 in the event a safety limit is violated are deleted. CTS 6.7 requires the event to be reported. This is redundant, however, to the applicable reporting requirements in 10 CFR 50.72 and 50.73. Thus, the redundant reporting requirements of CTS 6.7 are relocated to the QA plan (see DOC 5.0- LA.9). Deleting a CTS requirement to comply with another CTS requirement that is not retained in the ITS does not of itself reduce the CTS reporting requirements, which themselves are redundant to regulation. Therefore, deletion of these action requirements is an administrative change	2.2.1, 2.2.2.1, and 2.2.2.2	2.1.1 and 2.1.2

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.0 LCO AND SR APPLICABILITY

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.0 A.1	The CTS have been reformatted and renumbered in accordance with NUREG-1431. As a result, the Technical Specifications are more readily readable, and therefore understandable, by plant operators as well as other users. The reformatting, renumbering, and rewording process serves only to clarify the CTS requirements and involves no technical changes to the CTS.	Section 3.0	Section 3/4.0
3.0 A.2	The following language changes were made to the parts of CTS 3.0.1 and 3.0.2 that form ITS LCO 3.0.1: • The phrase "Compliance with ... is required" was replaced with the phrase "LCOs shall be met," • The phrase "Conditions specified therein" was changed to "specified conditions in the Applicability," and • The phrase "that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met" was changed to "as provided in LCO 3.0.2 and LCO 3.0.7." These language changes are administrative because the ITS language is equivalent to the CTS language and reflects the reorganization of LCO applicability requirements to conform to the STS format and terminology. This change enhances clarity while accounting for the reorganization of provisions contained in ITS LCOs 3.0.2 and 3.0.7.	LCO 3.0.1	3.0.1 and 3.0.2

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.0 LCO AND SR APPLICABILITY

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.0 A.3	The initial sentence of CTS 3.0.2 reads "Noncompliance with a specification shall exist when the requirements of the LCO and associated Action requirements are not met within the specified time intervals." This language was replaced in ITS LCO 3.0.2 with "Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be me, except as provided in LCO 3.0.5 and 3.0.6." This is an administartive change because the ITS language is equivalent to the CTS language, except for the exceptions to ITS LCO 3.0.5 and LCO 3.0.6 which were added to conform to the STS and which are discussed elsewhere (see Table L, DOC 3.0-L.2 and Table M, DOC 3.0-M.3). The second sentence of CTS 3.0.2 reads "If the LCO is restored prior to expiration of the specified time intervals, completion of the Action requirements is not required." In the second sentence of ITS LCO 3.0.2, the phrase "restored" was changed to "met or is no longer applicable;" "time intervals" was changed to "Completion Time(s);" and "Action requirements" was changed to "Required Actions(s)," to conform to equivalent STS terminology. Also, the phrase "unless otherwise stated" was added, to account for the existence of specific exceptions in individual specifications. These changes are administrative because they only incorporate equivalent STS terminology, and account for TS exceptions found in a few CTS specifications and corresponding ITS specifications.	LCO 3.0.2	3.0.2
3.0 A.4	• The language in CTS 3.0.3 "except as provided in the associated Action requirements" was replaced with "and the associated Actions are not met, an associated Action is not provided, or if directed by the associated Actions" to explicitly state all the conditions that would require entry into this specification. • The time intervals in CTS 3.0.3 to reach each MODE were revised to include the additional 1 hour allowed by CTS 3.0.3 for initiating the shutdown. continued	LCO 3.0.3	3.0.3

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.0 LCO AND SR APPLICABILITY

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.0 A.4 continued	• The language in CTS 3.0.3 "Where corrective measures are completed that permit operation under the ACTION requirements, the action may be taken in accordance with the specified time limits as measured from the time of failure to meet the LCO" was changed to "Where corrective measures are completed that permit operation in accordance with the LCO or Actions, completion of the actions required by LCO 3.0.3 is not required." This clarifies the CTS intent that LCO 3.0.3 action requirements (as for all other action requirements) do not have to be completed when the condition associated with those actions no longer exists. • The sentence in CTS 3.0.3 "This specification is not applicable in MODE 5 or 6" was changed to "LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4" which is equivalent. These changes are administrative because they are equivalent to and clarify the intent of the CTS requirements, while conforming to the STS format and presentation.	LCO 3.0.3	3.0.3
3.0 A.5	• The initial sentence of CTS 3.0.4 is reformatted for clarity. It reads "Entry into an OPERATIONAL MODE or other specified condition shall not be made when the conditions for the LCO are not met and the associated ACTION requires a shutdown if they are not met within a specified time interval." The revised statement in ITS LCO 3.0.4 reads "When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time." • The second sentence of CTS 3.0.4 reads "Entry into an Operational Mode of specified condition may be made in accordance with ACTION requirements when conformance to them permits continued operation of the facility for an unlimited period of time. This sentence is omitted from ITS LCO 3.0.4 because of its substantive similarity to the first sentence; i.e., it is redundant. continued	LCO 3.0.4	3.0.4

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.0 LCO AND SR APPLICABILITY

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.0 A.5 continued	• The third sentence of CTS 3.0.4 is also revised for clarity. It reads "This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements." The revised statement in ITS LCO 3.0.4 reads "This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS." These changes are administrative because they are equivalent to and clarify the intent of the CTS requirements, while conforming to the STS format and presentation.	LCO 3.0.4	3.0.4
3.0 A.6	Not used.		
3.0 A.7	ITS LCO 3.0.7 was added to provide guidance for operation under the Test Exception LCOs and to conform to the STS. The addition of ITS LCO 3.0.7 is administrative because it is consistent with the intent of the CTS Test Exception requirements.	LCO 3.0.7	Not Applicable
3.0 A.8	Portions of the CTS 4.0.3 were combined with CTS 4.0.1 to more completely present the relationship between Surveillance Requirements and meeting the requirements of the LCO. The second sentence of ITS SR 3.0.1, "Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO," was added to clarify the intent of CTS 4.0.1. The concept (editorially rewritten) found in the first sentence of CTS 4.0.3, has been moved to CTS 4.0.1; "Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO, except as provided in SR 3.0.3." The sentence "Surveillance requirements do not have to be performed on inoperable equipment" is moved from the last sentence of CTS 4.0.3, to CTS 4.0.1. Since all LCOs do not deal exclusively with equipment OPERABILITY, a clarifying phrase was also added: "or variables outside specified limits." These changes are administrative because they are equivalent to and clarify the intent of the CTS requirements, while conforming to the STS format and presentation.	SR 3.0.1	4.0.1 and 4.0.3

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.0 LCO AND SR APPLICABILITY

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.0 A.9	CTS 4.0.2 was revised to clearly establish what constitutes meeting the specified Frequency of each Surveillance Requirement (SR). It states, "The specified Frequency for each SR is met if the surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met." CTS 4.0.2 was further revised by adding the sentence "Exceptions to this Specification are stated in the individual Specifications" to acknowledge the explicit use of exceptions in various SRs. These changes are administrative because they only clarify the intent of the CTS.	SR 3.0.2	4.0.2
3.0 A.10	The phrase in CTS 4.0.4 "Entry into an OPERATIONAL MODE or other specified condition of an LCO," is replaced with "Entry into a MODE or other specified conditions in the Applicability." This change is administrative because it only expresses the meaning of the CTS language with ITS terminology and does not introduce a technical change.	SR 3.0.4	4.0.4
3.0 A.11	The technical content of CTS 4.0.5 regarding inservice testing (IST) is retained in ITS 5.5.8, "Inservice Testing Program". Technical changes to IST requirements are addressed under ITS Section 5.0, see Table L, DOC 5.0-L.2. See Table L, DOC 5.0-L.8, regarding the deletion of the inservice inspection requirements contained in CTS 4.0.5. The movement of these requirements within the TS is an administrative change.	5.5.8	4.0.5
3.0 A.12	The CTS for each unit is currently contained within separate volumes. The ITS combines the CTS for Units 1 and 2 into a single volume. Until recently, prior to Operating License Amendments 148 and 142 for Catawba and Amendments 166 and 148 for McGuire, the CTS were in a combined format. Consistent with CTS 3.0.5 and 4.0.6 which existed prior to the above amendments and the earlier combined format, the ITS contain LCO 3.0.8 and SR 3.0.5 to clearly state that each individual LCO and the associated action and and surveillance requirements apply to each unit independently, unless otherwise specifically stated. In those instances, the specification or surveillance denotes limits for each unit individually, or the specification is identified as only being applicable to a particular unit. This is consistent with. This change is administrative because it only restates the requirements which already exist when each unit's TS is provided in separate volumes and because it does not of itself alter any CTS requirements.	LCO 3.0.8 SR 3.0.5	N/A

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.1 REACTIVITY CONTROL SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.1 A.1	The CTS has been reformatted and renumbered in accordance with NUREG-1431. As a result, the Technical Specifications are more readily readable, and therefore understandable, by plant operators as well as other users. The reformatting, renumbering, and rewording process serves only to clarify the CTS requirements and involves no technical changes to the CTS.	3.1	3.1
3.1 A.2	The CTS Applicability of MODES 1, 2* , 3 and 4, with * representing the test exception for CTS 3.10.1 was revised to only require a specific SDM LCO in MODE 2 with K_{eff} less than 1.0, and in MODES 3, 4, and 5. The SDM requirement in MODES 1 and 2 with K_{eff} > 1.0, is maintained by conformance with the following ITS Specifications: LCO 3.1.4, Rod Group Alignment Limits; LCO 3.1.5, Shutdown Bank Insertion Limits; and LCO 3.1.6, Control Bank Insertion Limits. The test exception requirements of CTS 3.10.1 referenced in the CTS Applicability are applicable to the ITS LCOs listed above and are contained in ITS test exception 3.1.8 . Therefore, this change reorganizes but does not reduce the CTS requirements for SDM.	3.1.1	3.1.1.1
3.1 A.3	The CTS Actions which require restoring the SDM to within limits immediately were revised to allow 15 minutes to restore SDM. Immediately is described as 15 minutes in the CTS bases for operator action to start a boration to restore SDM. Therefore, this change is consistent with the current plant practice for performing this Action requirement.	3.1.1	3.1.1.1
3.1 A.4	The two CTS LCOs which specify the SDM limits for MODES 1-4 and MODE 5 were combined into one SDM LCO in the ITS. This change reorganizes the SDM requirements but does not introduce a technical change to those requirements.	3.1.1	3.1.1.1 and 3.1.1.2
3.1 A.5	A portion of CTS Surveillance 4.1.1.1.2 was included in the SRs in the ITS LCO for SDM and the portion of the CTS surveillance requirement regarding the core reactivity limit was retained in a new ITS LCO specifically for Core Reactivity with an appropriate Action and Surveillance. This change reorganizes the CTS SDM surveillance requirement but does not introduce a technical change to that requirement.	SR 3.1.2.1 and LCO 3.1.2	4.1.1.1.2

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.1 REACTIVITY CONTROL SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.1 A.6	The CTS Surveillance Requirement that specifies SDM be verified "Prior to initial operation above 5% RATED THERMAL POWER after each fuel loading" is moved to a new ITS SR Frequency requirement. The CTS requirement is reorganized to conform with the ITS but is retained within the TS.	SR 3.1.2.1	4.1.1.1.1.d
3.1 A.7	The reference in the CTS 3.1.1.3 Action to maintaining the insertion limits of LCO 3.1.3.6 is redundant to the requirements specified in LCO 3.1.3.6. LCO 3.0.2 requires that the actions must be met wt. the LCO is not met, therefore, the statement in Specification 3.1.1.3 is unnecessary to ensure the appropriate insertion limits are maintained and has been eliminated.	3.1.3, Required Action A.1	3.1.1.3 Action a.1
3.1 A.8	Not used.		
3.1 A.9	The CTS Surveillance requirement that the MTC be measured under specific conditions has been reformatted into three Notes, which precede the corresponding ITS surveillance.	SR 3.1.3.2, Notes	4.1.1.3.b
3.1 A.10	The CTS Action which requires the control rods to be maintained within the withdrawal limits established in Action a.1 until a subsequent calculation verifies that the MTC has been restored to within limits was deleted. This CTS Action requirement is redundant to the general rules of TS(LCO 3.0.2) which specify that Actions remain applicable unless the parameter, system, etc., is restored to within limits or the Mode of Applicability is exited. This CTS Action is not necessary to ensure the appropriate Actions continue to be followed.	3.1.3	3.1.1.3 Action a.2
3.1 A.11	The CTS Applicability cross reference footnote to the Special Test Exception in CTS 3.10.3 was deleted. The ITS format does not include informational cross reference notes. The deletion of this footnote does not affect the Applicability of the CTS or the Test Exception and is solely a format issue.	3.1.3	3.1.1.3

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.1 REACTIVITY CONTROL SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.1 A.12	The CTS Action requirement that the plant be placed in Hot Standby within 6 hours if the control rod limits cannot be established within 24 hours when the moderator temperature coefficient (MTC) is not within the upper limit was revised to require the plant to be placed in Mode 2 with Keff < 1.0 (outside the Applicability of the LCO) within 6 hours. This is an administrative change because the general rules of TS (3.0.1) state that the LCO is only applicable during the Modes of Applicability specified in the individual Specifications. Therefore, once the plant reaches Mode 2 with Keff < 1.0, the LCO and its action are no longer applicable.	3.1.3	3.1.1.3 Action a.1
3.1 A.13	The CTS Action that requires the THERMAL POWER level during subsequent operation with a misaligned rod to be restricted as specified in Specification 3.1.3.6 was deleted. This reference does not provide either clarity or additional unique Actions and is therefore deleted. The requirements to maintain rod insertion limits (CTS 3.1.3.6) or take the appropriate Actions (including limiting power) are not affected by this change and remain applicable.	3.1.4	3.1.3.1, Action c.2
3.1 A.14	Not Used.		
3.1 A.15	The CTS LCO requirement for rod drop times was converted to an ITS Surveillance Requirement. The change only affects the format and presentation of this CTS requirement.	SR 3.1.4.3	3.1.3.4
3.1 A.16	The CTS requirements that SDM be evaluated to be within limits, within 1 hour of discovery that a rod(s) is untrippable was revised to require that SDM be verified within limit or, if SDM is not within limit, the initiation of boration to restore SDM is required. The additional action to initiate boration is now included in the ITS LCO because of the modification to ITS LCO 3.1.1, "SDM", which does not now include SDM Actions for Modes 1 or 2. This change maintains the existing technical requirements and is therefore considered administrative.	3.1.4, ACTION A	3.1.3.1, Action a
3.1 A.17	The Applicability reference to Special Test Exceptions CTS 3.10.2 and 3.10.3 in the CTS LCOs was deleted. This type of informational reference is not used in NUREG-1431. The deleted information was not a technical requirement and served only to provide additional information to the user.	3.1.4, 3.1.5, and 3.1.6	3.1.3.1, 3.1.3.5, and 3.1.3.6

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.1 REACTIVITY CONTROL SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.1 A.18	The CTS actions which provide an exception for control and shutdown rods being within required limits during rod freedom of movement testing in CTS SR 4.1.3.1.2 were converted to Notes and retained in the Applicability of the corresponding ITS LCOs. No technical requirements are modified by this change.	3.1.5 and 3.1.6	3.1.3.5 and 3.1.3.6 Actions
3.1 A.19	The CTS Applicability of MODE 1 and MODE 2 with $K_{eff} \geq 1.0$ was revised to MODE 1 and MODE 2 with any control bank not fully inserted. The revised Applicability is consistent with the intent of the CTS to ensure the LCO is Applicable for critical operations (approached by control bank withdrawal). The existing technical requirements are maintained in the ITS format and presentation.	3.1.5	3.1.3.5
3.1 A.20	Actions have been added to the CTS LCOs for shutdown and control bank insertion limits to verify SDM when insertion limits are not met. The addition of these Actions is consistent with the deletion of the MODE 1 and 2 SDM requirements from the CTS (see A.2). The new Actions are taken from existing CTS requirements to maintain SDM in MODES 1 and 2. The addition of these Actions does not introduce a technical change and serves to maintain the existing SDM requirements from CTS 3.1.1.1 and CTS 3.1.3.1 to verify or restore SDM.	3.1.5 and 3.1.6	3.1.3.5 and 3.1.3.6
3.1 A.21	The Completion Times for the CTS Actions for a shutdown rod inserted beyond the insertion limit, and for misaligned rods (1 hour each) which may be applied consecutively to a given rod were combined and retained in a single ITS Action as one 2 hour Completion Time. The CTS requirement to shutdown to MODE 3 was also retained as an ITS Action. The change affects the format and presentation of these requirements and does not introduce a technical change.	3.1.5, Required Action A.2, and ACTION B	3.1.3.1 and 3.1.3.5
3.1 A.22	Not Used.		
3.1 A.23	Specific requirements for the control bank sequence and overlap limits have been added. These parameters have always been a part of the control bank insertion limit as detailed by the figure in the COLR. Therefore, no technical requirements are modified and the change is considered administrative in nature since it clarifies information already contained within the existing requirements.	3.1.6	3.1.3.6 and 4.1.1.1.1.b

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.1 REACTIVITY CONTROL SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.1 A.24	The CTS Test Exception to rod alignment and insertion limits during PHYSICS TESTING in MODE 2 was revised by the addition of appropriate requirements, actions, and surveillances. The addition of these requirements is consistent with the deletion of CTS 3.1.1.1 SDM requirements for MODE 1 and 2 (see Doc A.2). The CTS MODE 1 and 2 SDM requirements are therefore retained in the corresponding ITS Test Exception LCO. This change represents a reorganization of the CTS requirements to be consistent with the ITS.	3.1.8	3.10.3
3.1 A.25	The CTS requirement that the reactor trip setpoints of the intermediate and power range channels to be set at 25% during performance of PHYSICS TESTS during MODE 2 is redundant to ITS LCO 3.3.1, "RTS Instrumentation" which requires that the trip setpoints for the channels be set to 25% for the intermediate and power ranges in MODE 2. The deletion of redundant requirements is administrative and does not represent a technical change.	3.1.8	3.10.3.b
3.1 A.26	The CTS exceptions to SDM, the exceptions for rod insertion and power distribution limits, and the exceptions for rod position indication are no longer needed and are deleted. The tests for which these exceptions were required are no longer performed or the LCOs for which the exceptions were intended are no longer part of the TS. SDM will be maintained within the limits specified in the COLR during PHYSICS TESTS. PHYSICS TESTS will be conducted in MODE 2, thus the MODE 1 exception is not needed. Rod position exception is no longer needed in MODES 3, 4, or 5 and in MODE 2 with $K_{eff} < 1.0$. The ITS test exceptions for PHYSICS TESTS in MODE 2 provides an exception to rod alignment requirements.	3.1.8	3.10.1, 3.10.2, and 3.10.5
3.1 A.27	The CTS MODE 2 Test Exception allows exceptions to certain LCOs for the performance of physics tests provided power is limited to $\leq$ 5% of Rated Thermal Power (RTP). The power limitation statement was deleted from the LCO as it is redundant to the Applicability for the LCO which is MODE 2 ($\leq$ 5% RTP).	3.1.8	3.10.3.a
3.1 A.28	The CTS requirement for verifying SDM when an inoperable (immovable or untrippable) control rod is discovered were consolidated and retained in one ITS LCO that contains the requirements for an untrippable control rod (Action A). This change results in the deletion of redundant requirements. No technical requirements are deleted by the elimination of redundant requirements.	3.1.4	4.1.1.1.1.a and 4.1.1.2.a

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.1 REACTIVITY CONTROL SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.1 A.29	The phrase, "The rod is declared inoperable" when a rod is not within alignment limits in the CTS Actions was deleted. This wording does not add any clarity to the actions and the format in the ITS is such that actions are only entered when the LCO is not met, i.e. the component is inoperable. Therefore, the additional wording is not necessary for inclusion within the ITS.	3.1.4	3.1.3.1 Actions c.2 and c.3
3.1 A.30	The CTS requirement that an out of limit control bank be restored within 2 hours or that power be reduced to match the power limit for the existing insertion position was revised to simply require that the insertion limit be restored. Since there are only two ways to restore compliance (i.e., withdraw the control banks or reduce power to match control bank position), the requirement to restore limits is all that is necessary to be specified. This change simplifies and clarifies the CTS requirements without introducing a technical change.	3.1.6	3.1.3.6

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.2 POWER DISTRIBUTION LIMITS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.2 A.1	The CTS has been reformatted and renumbered in accordance with NUREG-1431. As a result, the requirement is more readily readable, and therefore understandable, by plant operators as well as other users. The reformatting, renumbering, and rewording process serves only to clarify the CTS requirements and involves no technical changes to the CTS.	3.2	3.2
3.2 A.2	The CTS Action requirement that $F_Q^M(X,Y,Z)$ be demonstrated through incore mapping to be within its limit prior to increasing THERMAL POWER above the reduced limit required by Action a was simplified to state, "Perform SR 3.2.1.1." This surveillance requires the determination of $F_Q^M(X,Y,Z)$ which can only be done by performing a flux map using incore instrumentation.	3.2.1	3.2.2, Action d
3.2 A.3	The Actions for the transient operational F_Q limit which are contained in a CTS surveillance requirement are moved to the ITS Actions. This change will remove required actions from the surveillance requirements and will group them with the appropriate ACTION Condition.	3.2.1, Action B	4.2.2.2.c.2
3.2 A.4	The Actions for the transient RPS $F_Q^M(X,Y,Z)$ limit contained in a CTS surveillance requirement have been moved into the ITS Actions. This change removes required actions from the surveillance requirements and groups them with the appropriate ACTION Condition.	3.2.1, Action C	4.2.2.2.c.3.
3.2 A.5	The CTS exemption to the provisions of Specification 4.0.4 which allows the plant to enter MODE 1 without requiring the CTS Surveillance Requirement to be performed was converted directly into the associated ITS Surveillance Frequencies. The CTS allowance is retained in the ITS format.	SR 3.2.1.1, SR 3.2.1.2, and SR 3.2.1.3	4.2.2.1
3.2 A.6	The CTS Surveillance Requirements for verification that F_Q is within the operational transient limit and within the RPS transient limit and for an extrapolation of recent F_Q measurements to determine if the operational transient and RPS transient limits would be exceeded in the next 31 EFPD have been reformatted to be consistent with the corresponding ITS surveillances. The placement of information in an ITS note form and other editorial changes to conform with the ITS presentation of this information do not have a technical impact on the CTS requirements.	SR 3.2.1.2, and SR 3.2.1.3	4.2.2.2.c.1 and 4.2.2.2.d

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.2 POWER DISTRIBUTION LIMITS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.2 A.7	A Note was added to the CTS Actions to clarify that a power reduction is not required to meet the required actions if, prior to reducing power below 75% (or 50%), $F_{\Delta H}(X,Y)$ is restored within limit. No technical requirements are added or deleted by this change.	3.2.2 Actions	3.2.3 Actions
3.2 A.8	The CTS Action that allows operation to proceed and THERMAL POWER to be increased provided $F_{\Delta H}(X,Y)$ is demonstrated within limit prior to increasing THERMAL POWER whenever power is reduced because $F^{M}_{\Delta H}(X,Y)$ is not within limit has been reformatted as a Note to the required actions in ITS Actions.	3.2.3 Actions	3.2.2 Action d
3.2 A.9	The CTS allowance for an exemption to the provisions of Specification 4.0.4 that allowed the plant to change MODES (enter MODE 1) without requiring the Surveillance Requirement to be performed is retained in the Frequency requirements of the corresponding ITS Surveillance Requirement.	SR 3.2.2.1	4.2.3.1
3.2 A.10	The CTS Surveillance Requirements for verification of hot channel factors after the QPTR indicated by the excore detectors is normalized using incore detectors was converted to an action in the ITS QPTR LCO. The CTS requirements are retained intact in the form of Actions.	3.2.4 Actions	4.2.2.2.b.3 and 4.2.3.2.b.3
3.2 A.11	Not used.		
3.2 A.12	The CTS SRs for a determination that $F_{\Delta H}$ is within the surveillance [illegible] for an extrapolation of recent $F_{\Delta H}$ measurements to determine if the surveil[illegible]nit would be exceeded in the next 31 EFPD were reformatted and retained in the [illegible]nding ITS Surveillance Requirement. No technical changes were introduced wh[illegible]rmatting the CTS requirements.	SR 3.2.2.2	4.2.3.2.c.1 and 4.2.3.2.d
3.2 A.13	The CTS Surveillance contains Actions if the $F_{\Delta H}$ surveillance margin has not been met. The Action requirements in the Surveillance are redundant to the Actions provided in the associated LCO. Since, if the Surveillance was not met the LCO Actions would be applicable, the Actions contained in the CTS Surveillance are not required and have been deleted.	3.2.2 Actions	4.2.3.2.c.2

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.2 POWER DISTRIBUTION LIMITS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.2 A.14	The CTS Surveillance details for determining when AFD is considered out of Limits was reworded and moved to a Note in the corresponding ITS LCO. The Note maintains the CTS requirement that AFD is considered outside the limits when two or more OPERABLE excore channels indicate that AFD is outside the limits.	3.2.3	4.2.1.2
3.2 A.15	The CTS requirement to restore AFD within limits in 15 minutes has been deleted. The CTS requirement to reduce power below 50% RTP within 30 minutes has been retained. The option to restore compliance with the LCO (within the 30 minutes allowed before a shutdown) is always an alternative as provided in LCO 3.0.2 and is not necessary to be specifically stated unless restoration is the only option available.	3.2.3	3.2.1 Action a.2
3.2 A.16	The CTS Action to prohibit an increase in power above 50% RTP unless AFD is within limits has been deleted. Since ITS LCO 3.0.4 would prohibit entering the mode of applicability unless the AFD was within limits, the CTS Action is redundant and not required.	3.2.3	3.2.1 Action b
3.2 A.17	The footnote and the reference in the Applicability of the CTS to Special Test Exceptions Specification 3.10.2 serves to provide an informational reference and has been deleted. The ITS does not include informational references. Test exceptions associated with physics testing are incorporated into ITS LCO 3.1.8, "Physics Tests Exceptions" and stand alone without a reference in another LCO. This change does not delete any technical requirements. Test Exception LCOs do not impose restrictions on the CTS LCO.	3.2.3	3.2.1
3.2 A.18	Not used.		
3.2 A.19 (C)	The CTS Surveillance has been revised to delete the reference to the provision of Specification 4.0.4. The exception to 4.0.4 was a carryover from a previous methodology for controlling AFD and is not needed for the relaxed control schemes retained in the corresponding ITS LCO. Control is maintained by ITS LCO 3.0.4 and SR 3.0.4 such that AFD must be within limits and the surveillance must be performed prior to entering the mode of applicability and no exception is required.	3.2.3	4.2.1.1

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.2 POWER DISTRIBUTION LIMITS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.2 A.20	The footnote and the reference in the Applicability of the CTS to Special Test Exceptions Specification 3.10.2 is no longer needed and has been deleted. This type of informational footnote is no longer used in the ITS. The Test exceptions associated with physics testing are now incorporated into ITS LCO 3.1.8, "Physics Tests Exceptions" which stands alone without additional references. This change does not add or delete any technical requirements. .	3.2.4	3.2.4
3.2 A.21	The CTS Action which provides an option to restore quadrant power tilt ratio (QPTR) to within limit has been deleted. The option to restore compliance with the LCO is always an alternative, as provided in LCO 3.0.2, and is unnecessary to state unless that is the only option available.	3.2.4	3.2.4 Action a.2.a
3.2 A.22	The CTS action which provides an exception to Specification 3.0.4 has been deleted. The required actions of the corresponding ITS LCO provide for continued operation in Condition A for an unlimited period of time. As ITS LCO 3.0.4 allows MODE changes when Actions allow continued operation for an unlimited period of time, the CTS exception to 3.0.4 is no longer required.	3.2.4 Action A	3.2.4 Action d
3.2 A.23	Three Notes were added to the CTS surveillance, which allow the following: 1) with one Power Range channel input to QPTR inoperable, the remaining three channels may be used to calculate QPTR (currently in the CTS 1.0 definition of QPTR), and 2) the performance of the incore system evaluation of QPTR may be used in lieu of the QPTR calculation. These additions provide increased clarity without introducing a technical change to the CTS requirements.	SR 3.2.4.1	4.2.4.1
3.2 A.24	The CTS requirement for having THERMAL POWER > 75% RTP and having an inoperable Power Range input to QPTR, is changed to a Note in the Surveillance and retained in the corresponding ITS Surveillance.	SR 3.2.4.2	4.2.4.2
3.2 A.25	The CTS LCO for departure from nucleate boiling (DNB) parameters was moved to the ITS Section 3.4, Reactor Coolant Systems, consistent with the location of this specification in the STS. Changes to the CTS are described in the discussion of changes for ITS 3.4.1.	3.4.1	3.2.5

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.3 INSTRUMENTATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.3 A.1	The CTS has been reformatted and renumbered in accordance with NUREG-1431. As a result, the Technical Specifications are more readily readable, and therefore understandable, by plant operators as well as other users. The reformatting, renumbering, and rewording process serves only to clarify the CTS requirements and involves no technical changes to the CTS.	3.3	3.3
3.3 A.2	Current Technical Specification (CTS) Surveillance Requirement 4.3.1.1 which refers to CTS Table 4.3-1 for the required Surveillance Requirements applicable to each Function was converted into a Note which references ITS Table 3.3.1-1 for the Surveillance Requirements applicable to each Function.	3.3.1 Note	4.3.1.1
3.3 A.3	CTS 3.3.1 and associated Tables were revised into an integrated ITS table (3.3.1-1) containing all the information for each instrument function. The following format and presentation changes were made in this conversion: The TOTAL NUMBER OF CHANNELS column was renamed to be the REQUIRED CHANNELS, The MINIMUM CHANNELS OPERABLE column and CHANNELS TO TRIP column were eliminated from the Table, this is a format change as all the Actions were also revised to be referenced from and based on the new REQUIRED CHANNELS column which eliminates the need for the other columns, A clarification was made to the APPLICABLE MODES column. The phrase "OR OTHER SPECIFIED CONDITIONS" was added to the APPLICABLE MODES column title. This addition was intended to cover the Notes normally used to modify the Applicable Modes listed in this column, Three new columns were added to the CTS Table 3.3-1. A SURVEILLANCE REQUIREMENTS column was added to list the surveillance requirements for each instrument function consistent with CTS Table 4.3-1. Also an ALLOWABLE VALUE column and a TRIP SETPOINT column were added for each instrument function to include the values previously provided in CTS Table 2.2-1. The CTS ACTION column is changed to a CONDITIONS column in accordance with NUREG-1431. All CTS actions are replaced with ITS Conditions.	Table 3.3.1-1	3.3.1

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.3 INSTRUMENTATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.3 A.4	The CTS Action statements which allow an inoperable channel to be bypassed for up to 4 hours for Surveillance testing of other channels, are revised and presented in a Note format in the corresponding ITS Conditions. For McGuire, the note was also clarified to allow any one channel to be bypassed for surveillance testing. This additional clarification for testing in bypass was previously approved for McGuire by the NRC during the implementation of WCAP-10271 (Refer to SER for Amendment 165 (U1) and 147 (U2) dated February 15, 1996).	(C) 3.3.1 Conditions D, E, L, M, and N (M) 3.3.1 Conditions D, E, M, N, and O	Table 3.3-1, Actions 2b and 6b
3.3 A.5	The CTS allowance for an inoperable channel to be bypassed for Surveillance testing of another channel was revised to clarify that an inoperable channel may be bypassed when adjusting the trip setpoints of another channel.	3.3.1 Condition D	Table 3.3-1 Action 2.b
3.3 A.6	The CTS Action was separated to more clearly identify the Actions specified for each Power Range Neutron Flux Function (High and Low trip). The ITS group the existing actions with each function independently to clearly identify those actions appropriate to the function.	3.3.1 Conditions D and E	Table 3.3-1 Action 2
3.3 A.7	The MODE of applicability for the Intermediate Range instrumentation in CTS was separated into two different Modes (above P-6 and a below P-6). This change is consistent with the design of the instrumentation and affects the format and presentation of this information only. The ITS utilizes separate Modes to accommodate separate actions for the Intermediate Range Instrumentation (discussed elsewhere).	Table 3.3.1-1	Table 3.3-1
3.3 A.8	The CTS Pressurizer Pressure - Low, Pressurizer Water Level-High, Undervoltage--Reactor Coolant Pumps, and Underfrequency--Reactor Coolant Pumps functions which are only required operable above the P-7 interlock as indicated by the CTS 3.3.1 titles and/or design for these functions were revised by the addition of a note which clearly states the relationship of these Functions to the P-7 interlock in the Applicability of each function. The addition of this note to the Mode of Applicability for each affected function is a clarification consistent with the design of each function and the CTS titles used for the functions.	Table 3.3.1-1	Table 3.3-1
3.3 A.9	The CTS Applicability for the Reactor Coolant Flow - Low Single Loop function was modified by a Note consistent with the CTS title for this function. The Note clarifies that the function is only required operable above the P-8 interlock which conforms with the plant design.	Table 3.3.1-1	Table 3.3-1

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.3 INSTRUMENTATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.3 A.10	The Applicability for the Reactor Coolant Flow - Low Two Loop function was modified by a Note consistent with the CTS title for this function. The Note clarifies that the function is only required operable above the P-7 interlock and below the P-8 Interlock which conforms with the plant design.	Table 3.3.1-1	Table 3.3-1
3.3 A.11	The CTS P-7 function was revised to separate the component parts of the function (P-10 and P-13) into discrete line item Functions. These component parts are no longer listed under P-7 but remain listed as individual interlocks in the ITS. This change only affects the format and presentation of this information.	Table 3.3.1-1	Table 3.3-1
3.3 A.12	A clarifying Note was added to the RTB function. The Note clarifies that the RTB bypass breakers that are racked in and closed are included in the instrument function to meet the requirement for 2 RTB channels. The note does not introduce a technical change but provides additional information to aid in applying the TS requirements when using the RTB bypass breakers.	Table 3.3.1-1	Table 3.3-1
3.3 A.13	The CTS RTB function has been separated into the RTB function and the undervoltage and shunt trip mechanism function. The applicable CTS Action statement 12 is also separated consistent with the separation of the RTB function. This change only revises the presentation of the RTB function and associated Actions without introducing a technical change.	3.3.1 RTB function (C) Condition T (M) Condition U	Table 3.3-1 Action 12
3.3 A.14	A clarifying Action was added to the CTS to provide guidance in the case of two inoperable channels. The clarification ensures no combination of Conditions could be entered such that a loss of RTS function would exist and a Completion Time still be allowed.	3.3.1 (C) Condition U (M) Condition V	Table 3.3-1, Functions 18 and 19
3.3 A.15	The surveillance requirement number and applicable modes for each instrument function in the CTS were combined with the actions and setpoints in one integrated ITS Table.	Table 3.3.1-1	Table 4.3-1
3.3 A.16	The CTS power range instrument surveillance which is modified by CTS Notes 2 and 4 was revised by the replacement of the Note 2 general exception to CTS SR 4.0.4 by a more specific Note that provides a clarification to indicate the Surveillance is not required to be completed until a specified time after exceeding 15% RTP. In addition, CTS Note 4 (exception for neutron detectors from a channel calibration) is no longer required since the new SR does not specify a channel calibration but simply requires a comparison and adjustment be performed. The ITS requirement for a comparison and adjustment more accurately reflects the intent and nature of this surveillance and does not introduce a technical change in the performance of this SR.	SR 3.3.1.2	Table 4.3-1, Notes 2 and 4

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.3 INSTRUMENTATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.3 A.17	The CTS surveillances for the Power Range Neutron Flux-High function, modified by Notes 3, 4, and 6, have been moved to the Overtemperature ΔT and Overpower ΔT functions in the ITS. This change was done to clarify the relationship of these two SRs to F(ΔI) and Overtemperature ΔT and Overpower ΔT functions. In addition, the surveillance notes and Frequencies have been reformatted to be consistent with the ITS representation of this information.	SR 3.3.1.3 and SR 3.3.1.6	Table 4.3-1, Notes 3, 4 and 6
3.3 A.18	CTS Table 4.3-1 Note (9), which requires the quarterly channel operational test to include verification that permissives P-6 and P-10 are in their required state for existing plant conditions was reformatted and presented as a surveillance note in the ITS.	SR 3.3.1.8	Table 4.3-1
3.3 A.19	The frequency specified in CTS Table 4.3-1 Note 7 and CTS Table 4.3-2 Note 1 that requires testing every 62 days on a staggered test basis was revised to require testing 31 days on a staggered test basis. This change implements the revised definition of Staggered Testing in ITS Section 1.0 and does not result in an actual change to the surveillance frequency.	SRs 3.3.1.4, 3.3.1.5, 3.3.2.2, and 3.3.2.4	Table 4.3-1 Table 4.3-2
3.3 A.20	The separate line item in the CTS for the reactor trip bypass breakers was combined with the line item for the reactor trip breakers consistent with the presentation of this information in the ITS.	Table 3.3.1-1	Table 3.3-1
3.3 A.21	The presentation of the undervoltage and shunt trip mechanisms of the RTBs was revised to show these functions as a separate line item in the ITS. This change in presentation also results in a change in the presentation of the associated surveillance requirements for the reactor trip breaker and bypass breaker functions on Table 4.3-1.	Table 3.3.1-1	Table 3.3-1 Table 4.3-1
3.3 A.22 (M)	A clarification has been added to the single channel Source Range Neutron Flux function in MODES 3, 4, and 5. The ITS Note clarifies that this function is required when the reactor trip breakers are open. A note already exists for the two channel function in these modes that states two channels are required Operable when the reactor trip breakers are closed and the rod control system is capable of rod withdrawal. Therefore, this addition only provides clarifying information.	Table 3.3.1-1	Table 3.3-1
3.3 A.23 (M)	The applicability of the CTS Turbine Trip function was modified by a Note consistent with the design for this function. The note specifies that the function is required operable above the P-8 (for McGuire) and P-9 (for Catawba) interlock which conforms with the normal operation of these interlocks. Below the interlock, a turbine trip does not cause an automatic reactor trip.	Table 3.3.1-1	Table 3.3-1

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.3 INSTRUMENTATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.3 A.24	A Note was added to the CTS Actions that allows separate condition entry for each ESFAS Function. The Note provides explicit instructions for proper application of the Actions for TS compliance. In conjunction with the ITS 1.3, "Completion Times," this Note provides direction consistent with the intent of the existing actions for the ESFAS Instrumentation.	3.3.2 Actions	3.3.2 Actions
3.3 A.25	The CTS reference to Table 4.3-2 for the required Surveillance Requirements applicable to each Function was converted into an ITS SR Note which references ITS Table 3.3.2-1 for the Surveillance Requirements applicable to each Function.	SR Note	4.3.2.1
3.3 A.26	The CTS ESFAS Table which lists the, "Total No. of Channels," "Channels to Trip," and "Minimum Channels Operable" was replaced with one ITS column that lists the, "Required Channels." The ITS actions classify inoperabilities based on the required channels, whereas the CTS actions were constructed based on total channels and minimum number of channels. A clarification was also made to the APPLICABLE MODES column. The phrase "or other specified conditions" was added to the APPLICABLE MODES column title. This change is intended to cover the Notes used to modify the modes listed in this column. The Notes modify the modes in the Table or identify conditions beyond the defined modes. Therefore, this change provides a more appropriate column title. In addition, the CTS ACTION column was renamed to the CONDITION column and all CTS actions are replaced with ITS Conditions. The above changes only affect the presentation of the information on the Tables.	(C) Tables 3.3.2-1, 3.3.6-1 3.3.7-1, and 3.3.8-1 (M) Tables 3.3.2-1, 3.3.6-1	Table 3.3-3
3.3 A.27	The completion time in the CTS for actuation logic and actuation relays which allows 12 hours to reach Mode 3 with an inoperable train was split into 6 hours for restoring the channel to operable status and 6 hours to reach Mode 3. This change is considered administrative since 6 hours is normally provided to reach Mode 3 in other similar actions and there is no change in the overall completion time.	3.3.2, Conditon C	Table 3.3-3, Action 14
3.3 A.28 (M)	The CTS Action statement which allows an inoperable channel to be bypassed for up to 4 hours for Surveillance testing of other channels, is revised to allow any one channel to be bypassed for surveillance testing. This clarification for testing in bypass was previously approved for McGuire by the NRC during the implementation of WCAP-10271 (Refer to SER for Amendment 165 (U1) and 147 (U2) dated February 15, 1996).	3.3.2 Condition D	3.3.2 Action 19
3.3 A.29	Not used.		

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.3 INSTRUMENTATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.3 A.30 (C)	The presentation of the Turbine Trip and Feedwater isolation functions in the CTS was revised to combine the two functions into one item on the ITS Table. This change only affects the format of the information in the TS.	Table 3.3.2-1	Table 3.3-3 , 3.3-4, and 4.3-2
3.3 A.31	The CTS Action has been reformatted to accommodate the difference in applicability for the associated functions. The resulting two corresponding ITS Actions maintain the existing requirements but specify shut down Actions more consistent with the Applicability of each affected function.	Table 3.3.2-1, Condition H (C) and Condition I (M)	Table 3.3-3, Action 21
3.3 A.32	Not used.		
3.3 A.33 (C)	The presentation of the CTS T_{avg}-Low for feedwater isolation function was revised to better illustrate the coincident logic with a reactor trip (P-4) by grouping these two functions together on the ITS Table. This change only affects the format of the TS information.	Table 3.3.2-1	Table 3.3-3
3.3 A.34	The CTS Actions have been reformatted to accommodate the difference in applicability for the associated functions. The resulting corresponding ITS Actions specify shut down Actions more consistent with the Applicability of each affected function.	3.3.2 Conditions D (C) and J (M)	Table 3.3-3, (C) Action 19 (M) Action 15
3.3 A.35 (M)	The CTS Turbine Trip and Feedwater Isolation function has been revised to include an initiation signal from Safety Injection. This signal relationship is already identified in the Safety Injection function in the CTS and therefore, does not represent a technical change.	Table 3.3.2-1	Table 3.3-3
3.3 A.36 (M)	The CTS Doghouse Water Level-High High function Action was reformatted to provide separate Action requirements for one or two trains inoperable. The specific details of the CTS Action remain unchanged.	3.3.2 Conditions L (C) and M (M)	Table 3.3-3 Action 25 (M) Action 27 (C)
3.3 A.37 (M)	The CTS Auxiliary Feedwater Suction Pressure-Low function Action was reformatted to provide separate Action requirements for one or two trains inoperable. The specific details of the CTS Action remain unchanged.	3.3.2 Conditions N (C) and O (M)	Table 3.3-3 Action 24 (M) Action 15a (C)
3.3 A.38	The CTS ESFAS table has been reformatted to eliminate the redundant presentation of the P-14 Interlock. The requirements for this interlock function have been retained under the Turbine Trip and Feedwater Isolation function.	Table 3.3.2-1	Table 3.3-3, 3.3-4, and 4.3-2

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.3 INSTRUMENTATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.3 A.39 (C)	The CTS Containment Air Return and Hydrogen Skimmer Operation Function has been deleted from the CTS ESFAS LCO. This ESFAS Function is redundant to the system requirements in CTS 3.6.5.6, 3.6.5.6, and the Containment Pressure High-High function instrument requirements in 3.3.2.	Table 3.3.2-1	Table 3.3-3, 3.3-4, and 4.3-2
3.3 A.40 (C)	The CTS Annulus Ventilation Operation function has been deleted from the CTS ESFAS LCO. This ESFAS function is redundant to the system requirements in CTS 3.6.1.8 and in CTS 3.3.2 as part of the Safety Injection function actuation signal.	Table 3.3.2-1	Table 3.3-3, 3.3-4, and 4.3-2
3.3 A.41 (C)	The CTS Nuclear Service Water Operation Functions 14.a through 14.f have been deleted from the CTS ESFAS LCO. This ESFAS function is redundant to the system requirements in CTS 3.7.4 and in CTS 3.3.2 as part of the Safety Injection and Phase B isolation function actuation signals. Loads started on a loss of offsite power signal are verified in CTS 3.8.1.1.	Table 3.3.2-1	Table 3.3-3, 3.3-4, and 4.3-2
3.3 A.42 (C)	The CTS Emergency Diesel Generator Operation Function 15 has been deleted from the CTS ESFAS LCO. This ESFAS function is redundant to the system requirements in CTS 3.8.1.1 and in CTS 3.3.2 as part of the Safety Injection function actuation signals.	Table 3.3.2-1	Table 3.3-3, 3.3-4, and 4.3-2
3.3 A.43	The CTS Post Accident Monitoring (PAM) Instrumentation LCO was revised by the addition of a Note to the CTS actions that allows separate condition entry for Functions in the Table. The ITS Note provides explicit instructions for proper application of the actions for Technical Specification compliance. In conjunction with ITS 1.3 "Completion Times," this Note provides direction consistent with the intent of the existing actions for the PAM Instrumentation.	3.3.3	3.3.3.6
3.3 A.44	The CTS requirement for the performance of a CHANNEL CHECK and a CHANNEL CALIBRATION at the frequencies shown in CTS Table 4.3-7 was reformatted into specific ITS Surveillances for the CHANNEL CHECK and CHANNEL CALIBRATION with a Note that states that these Surveillance Requirements apply to all the PAM Functions.	3.3.3	4.3.3.6
3.3 A.45	The "Minimum Channels Operable" column of the PAM CTS was replaced with the ITS "Required Channels" column. The CTS Actions are entered based on less than the "Minimum Channels Operable". The ITS Actions are configured such that less than the Required Channels Operable will cause entry into the actions. This change is one of presentation, technical changes to the Actions are discussed in other DOCs.	3.3.3, Table 3.3.3-1	3.3.3.6 Table 3.3-10

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.3 INSTRUMENTATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.3 A.46 (C)	The CTS PAM Action requirements that specify the content of the report required to be submitted to the NRC per CTS 6.9.2 has been moved to ITS Chapter 5.0, "Administrative Controls." The details regarding this report are now contained in an ITS Administrative Controls requirement instead of an Action requirement.	5.6.7	3.3.3.6 Action c
3.3 A.47	Not used.		
3.3 A.48	The CTS requirements for Hydrogen Monitors were combined with the existing hydrogen monitor functions in CTS PAM LCO to eliminate redundant requirements for this instrumentation. These monitors are used for post accident monitoring and are more appropriately located in the PAM LCO.	Table 3.3.3-1	3.6.4.1, Table 3.3-10
3.3 A.49	The CTS Remote Shutdown System Table has been revised by the addition of a clarifying Note that allows separate condition entry for the instrument Functions. The Note provides explicit instructions for proper application of the actions for Technical Specification compliance. In conjunction with ITS 1.3, "Completion Times," this Note provides direction consistent with the intent of the existing Actions for the Remote Shutdown Instrumentation.	3.3.4	3.3.3.5
3.3 A.50	The CTS Remote Shutdown Instrumentation Table columns are combined into one column labeled, "Required Number of Functions." The corresponding ITS table does not retain the split table format and makes only one column header for the existing "Minimum Channels OPERABLE" and "Total No. of Channels" columns. The ITS specifies only the number of required channels to be operable. This change only affects the format and presentation of this information.	Table 3.3.4-1	3.3.3.5 Table 3.3-9
3.3 A.51	The portion of the CTS "Engineered Safety Features Actuation System Instrumentation" that contains the Loss of Power (LOP) Instrumentation was moved to a separate specification in the ITS ("LOP DG Start Instrumentation"). This change also eliminated the CTS table format for the LOP Instrumentation.	3.3.5	3.3.2
3.3 A.52	The CTS applicability for the LOP DG Start Instrumentation that specifies Modes 1, 2, 3, and 4 was revised to require the LOP instrumentation to be operable in modes 1, 2, 3, and 4, and when an associated DG is required to be operable by LCO 3.8.2, "AC Sources - Shutdown." As the CTS shutdown electrical requirements (CTS 4.8.1.2) already specify certain surveillances to be met in Modes 5 and 6 for the DG required Operable which include the DG auto start capability (by LOP Instrumentation), this change only serves to make the instrument and electrical systems TS requirements consistent and does not introduce a technical change.	3.3.5	Table 3.3-3

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.3 INSTRUMENTATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.3 A.53	A Note has been added to the CTS Actions that allows separate condition entry for each LOP DG Start Function. The Note provides explicit instructions for proper application of the actions for Technical Specification compliance. In conjunction with ITS 1.3, "Completion Times," this Note provides direction consistent with the intent of the existing actions for the LOP Instrumentation.	3.3.5	3.3.2
3.3 A.54 (C)	The CTS requirement for an LCO 3.0.3 entry if more than one channel per Function of LOP DG Start instrumentation is inoperable is replaced with the ITS allowance of one hour to restore the channel to operable status. This change is considered an administrative change because one hour is the same time as provided in CTS LCO 3.0.3.	3.3.5	3.3.2 Table 3.3-3
3.3 A.55	Not used.		
3.3 A.56	The portion of the CTS "Engineered Safety Features Actuation System Instrumentation" specification which contains the Containment Purge and Exhaust Isolation Instrumentation is moved to a separate ITS LCO. The ITS provides a separate specification ("Containment Purge and Exhaust Isolation Instrumentation") for this function.	3.3.6	Table 3.3-3
3.3 A.57	A Note has been added to the CTS actions that allows separate condition entry for each Containment Purge and Exhaust Isolation Instrumentation Function. This Note provides explicit instructions for proper application of the actions for Technical Specification compliance. In conjunction with ITS 1.3, "Completion Times," this Note provides direction consistent with the intent of the existing actions for the ESFAS Instrumentation.	3.3.6	3.3.2
3.3 A.58 (C)	The CTS requirements for the Control Room Area Ventilation System (CRAVS) instrumentation were moved to a new LCO in the ITS specifically for the CRAVS instrumentation.	3.3.7	Tables 3.3-3 and 3.3-6
3.3 A.59 (C)	A Note was added to the CTS actions that allows separate condition entry for each CRAVS Actuation Instrumentation. This Note provides explicit instructions for proper application of the actions for Technical Specification compliance. In conjunction with ITS 1.3, "Completion Times," this Note provides direction consistent with the intent of the existing actions for the ESFAS Instrumentation.	3.3.7	3.3.2

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.3 INSTRUMENTATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.3 A.60 (C)	The CTS ESFAS Control Area Ventilation Operation function which includes requirements for a loss of power initiation with specific channel requirements, actions, and surveillance requirements was moved to the ITS LCO specifically for this instrumentation (3.3.7). The requirements for the loss of power initiation feature of this system are redundant to other TS requirements and were eliminated from the new ITS instrumentation LCO for this system. The loss of power DG start function is addressed by ITS LCO 3.3.5 and the verification that required loads are auto connected through the sequencer on a loss of power is contained in CTS 3.8.1.1 and is maintained in ITS SR 3.8.1.11.	3.3.7	Table 3.3-3
3.3 A.61(C)	A note was added to the CTS to require the CRAVS train be placed in the chlorine gas protection mode if automatic transfer to the chlorine gas protection mode is inoperable. This addition is consistent with the requirements of CTS 3.3.3.7 which has been relocated from the TS.	3.3.7	Table 3.3-3, Action 24
3.3 A.62 (C)	The CTS requirements for the Auxiliary Building Filtered Ventilation Exhaust System (ABFVES) actuation instrumentation were moved to a new LCO in the ITS.	3.3.8	Table 3.3-3
3.3 A.63 (C)	A Note was added to the CTS that allows separate condition entry for each ABFVES Actuation Instrumentation. This Note in the ITS provides explicit instructions for proper application of the actions for Technical Specification compliance. In conjunction with ITS 1.3, "Completion Times," this Note provides direction consistent with the intent of the existing actions for the ESFAS Instrumentation.	3.3.8	3.3.2
3.3 A.64 (C)	The CTS requirements for surveillance testing of the Source Range Neutron Flux Monitors consistent with CTS Table 4.3-1 when relying on these monitors to meet the requirements for the BDMS were made into specific SRs in the ITS LCO for the BDMS (3.3.9). No reference is used in the ITS to another LCO. In addition, the CTS error in referencing a monthly test in Table 4.3-1 was corrected. The referenced test on table 4.3-1 is a quarterly test and the new ITS surveillance is consistent with the frequency specified in Table 4.3-1.	SR 3.3.9.6 SR 3.3.9.4	4.3.3.11.2.a Table 4.3-1
3.3 A.65	The CTS requirement for a TADOT on the manual initiation function for Containment Purge and Exhaust was revised to clarify that verification of the setpoint is not required for the surveillance. The TADOT definition includes setpoint verification, however, this is a manual actuation with no associated setpoints.	SR 3.3.6.4	Table 4.3-2

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.3 INSTRUMENTATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.3 A.66	CTS requirement for a TADOT on the manual initiation function for SI, Containment Spray, Phase A, Phase B, and Steam Line Isolation was revised to clarify that the verification of setpoint is not required for this surveillance. The TADOT definition includes setpoint verification, however, these are manual actuations with no associated setpoints.	(C) SR 3.3.2.8 (M) SR 3.3.2.7	Table 4.3-2
3.3 A.67	The CTS requirement for a TADOT on the manual initiation function for reactor trip, reactor trip bypass breakers, and SI input to reactor trip was revised to clarify that the verification of setpoint is not required for this surveillance. The TADOT definition includes setpoint verification, however, these are manual actuations with no associated setpoints.	SR 3.3.1.14	Table 4.3-1
3.3 A.68 (C)	(Unit 1 only) concerning the filter time constant in the Unit 1 steam generator low-low level reactor trip circuitry was deleted. Unit 1 presently has no filter time constant associated with this circuitry. This note was added to the Unit 1 Technical Specifications on September 30, 1986, via license amendments 13 and 5 for Units 1 and 2, respectively. The purpose of the time constant was to assist in reducing the number of spurious low-low steam generator level reactor trips that occurred early in the plant operating history. The subject filter time constant was never actually implemented.	3.3.1	Note 13 on Table 4.3-1
3.3 A.69	The portion of the CTS note in the RTS Specification regarding the exception to the provisions of Specification 4.0.4 for entry into Modes 1 or 2 for the detector plateau curve verification was moved to the applicable ITS SR.	SR 3.3.1.11 Note 2	Note 5 on Table 4.3-1
3.3 A.70 (C)	The CTS Channel Calibration requirement for the overtemperature and overpower delta T functions was revised by the addition of a clarifying note which states that the surveillance shall include verification that the time constants are adjusted to the prescribed values. The overpower and overtemperature delta T functions have several time constants specified in their setpoints. As these constants are part of the CTS (and ITS) setpoint they are routinely verified in Channel Calibrations (which are required to verify the specified setpoints). Therefore the addition of this ITS surveillance note serves as a clarification or reminder that the Channel Calibration should include the time constants.	SR 3.3.1.10	Table 4.3-1

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.3 INSTRUMENTATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.3 A.71	A new ITS Note has been included in the ESFAS Channel Calibration surveillance requirement to require that the channel calibration include verification of time constants. Time constants are specified in the ESFAS as part of the setpoint. In CTS Table 3.3-4 the setpoints for McGuire Function 4.d and Catawba Function 4.e contain time constants for which the ITS note is applicable. As the time constants are specified as part of the function setpoint and the fact that a channel calibration must verify each function's setpoint, the addition of the ITS note provides a clarification and does not introduce a technical change in the calibration of any ESFAS function.	(M) SR 3.3.2.8 (C) SR 3.3.2.9	Table 4.3-2
3.3 A.72	A new ITS Note has been added to the CTS requirement for ESFAS Response Time Testing that provides an exception for the performance of Response Time Testing of the Turbine Driven AFW pump. The addition of this ITS note is consistent with an existing CTS allowance for testing the turbine-driven AFW pump contained in the Plant Systems Technical Specifications for the AFW system. As this allowance already exists in the CTS pump testing requirements, the addition of the ITS Response Time Surveillance Note serves only as a clarification of the existing CTS requirements.	(C) SR 3.3.2.10 (M) SR 3.3.2.9	4.3.2.2
3.3 A.73	The CTS surveillance requirement for the P-6 and P-10 interlocks is revised to more clearly identify the Nuclear Instrumentation channels associated with each interlock. The identification of the Intermediate Range Instrumentation in association with the P-6 interlock and the Power Range Instrumentation in association with the P-10 interlock is consistent with the design of those interlocks.	SR 3.3.1.8	Table 4.3-1, Note 9
3.3 A.74 (M)	The Plant specific Doghouse Water Level High-High Function Actions are based on the loss of one entire train (less than the minimum required number of channels operable or more than one channel inoperable). Therefore, the typical conversion to the ITS of the CTS Total number of channels with an Action for one channel inoperable does not apply. Instead of the total number of channels being used in the ITS "Required Channels" column, the CTS specified minimum number of channels per train is used in the ITS. The ITS Required Channels and Action Conditions preserve the CTS requirements in the ITS format.	Table 3.3.2-1 Function 5.e Conditions L (C) and M (M)	Table 3.3-3, Action 25 (M), Action 27 (C)

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.3 INSTRUMENTATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.3 A.75 (C)	The CTS table notation which states that the "Trip function is automatically blocked above P-11 interlock and may be blocked below P-11 when Safety Injection on low steam line pressure is not blocked" was revised in the ITS Applicability to state the signal may be blocked below P-11 when Steam Line Isolation Steam Line Pressure-Low is not blocked. The reference to SI has been deleted. Amendment No. 158/150 was issued by the NRC on April 3. 1997 to delete the steam line pressure-low safety injection signal. The CTS inadvertently included an additional reference to this SI signal which should have been deleted.	Table 3.3.2-1, Item 4.d.(2)	Table 3.3-3, Table Notation ##

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.4 REACTOR COOLANT SYSTEM

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.4 A.1	The CTS has been reformatted and renumbered in accordance with NUREG-1431. As a result, the Technical Specifications are more readily readable, and therefore understandable, by plant operators as well as other users. The reformatting, renumbering, and rewording process serves only to clarify the CTS requirements and involves no technical changes to the CTS.	3.4	3.4
3.4 A.2	The CTS action requirement to restore compliance with the LCO has been deleted. This Action is redundant to the rules of TS usage in the ITS. Restoration to meet the LCO is an option that always exists in accordance with ITS LCO 3.0.2.	3.4.1	3.2.5 Action c.1.a
3.4 A.3	The cross reference to the Special Test Exception provided by the Applicability footnote to in CTS has been removed and not included in the ITS. The ITS format does not typically include cross references.	3.4.2 and 3.4.4	3.1.1.4 and 3.4.1.1
3.4 A.4	The CTS requirement for RCS average temperature to be restored within 15 minutes or to be in Hot Standby within the next 15 minutes was revised to direct the plant be in Mode 2 with $K_{eff} < 1.0$ within 30 minutes consistent with the mode of Applicability. In accordance with LCO 3.0.2 in the CTS, if the condition was corrected within the second 15 minutes provided by the CTS Actions, exiting the Applicable mode would not be required. Therefore, this change is one of presentation only.	3.4.2	3.1.1.4
3.4 A.5	The CTS requirements to restore pressure/temperature limits within 30 minutes and perform an engineering evaluation to determine if the RCS is acceptable for continued operation were revised by the addition of a note which states that this action must be completed whenever the associated condition is entered. The ITS Note clarifies the existing CTS 3.4.9.1 requirement which implies the determination that the RCS is acceptable for continued operation must be performed any time the LCO limits have not been met, regardless of the duration of the condition.	3.4.3 Action A.2	3.4.9.1
3.4 A.6	The CTS requirement that the RCS average temperature be reduced to less than 200°F and 500 psig if the RCS is not shown to be acceptable for continued operation was revised to require the unit to be placed in MODE 5. The definition of MODE 5 specifies a temperature limit of $\leq$ 200°F.	3.4.3 Action B.2	3.4.9.1

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.4 REACTOR COOLANT SYSTEM

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.4 A.7	The CTS requirement for determining the RCS total flow rate by measurement on an 18 month interval was left over from a previously deleted requirement to perform a precision heat balance to determine RCS total flow. This requirement was deleted by license Amendments 128 and 122 dated February 17, 1995 for CNS and Amendments 153 and 135 dated January 12, 1995 for MNS. The deletion of this requirement should have included 4.2.5.3. As the resulting CTS 4.2.5.3 is effectively the same as the requirements in CTS 4.2.5.1 to determine total flow using the indicators every 12 hours, 4.2.5.3 is redundant and should have been deleted.	3.4.1	4.2.5.3
3.4 A.8	The CTS applicability requirement for monitoring pressure and temperature limits in the CTS SR has been reformatted from text in the body of the surveillance requirement to an SR note.	SR 3.4.3.1	4.4.9 1.1
3.4 A.9	The CTS requirements for RCS Loops in MODE 4 have been reformatted consistent with the ITS and split into two separate Actions. This change effectively keeps the same Actions in a different format.	3.4.6	3.4.1.3 Action a
3.4 A.10	The presentation of the CTS pressurizer safety valves setpoint limits of 2485 psig +3% and -2% was revised to apply the tolerances to the setpoint and state the limits as $\geq$ 2435 psig and $\leq$ 2559 psig.	3.4.10	3.4.2.2
3.4 A.11	The CTS Actions were revised by the addition of a note to indicate that separate Condition entry is permitted for each PORV. This Note provides a clarification of the ITS format for permitting multiple entry into the Conditions, as described in ITS Section 1.3, Completion Times and is consistent with the intent of the CTS requirements.	3.4.11	3.4.4
3.4 A.12	The explicit CTS Action for RCS PORVs to either restore an inoperable component, or comply with the required action was not retained in ITS. The allowance to restore inoperable components is an inherent feature of any action, as described in LCO 3.0.2.	3.4.11	3.4.4

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.4 REACTOR COOLANT SYSTEM

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.4 A.13	The CTS cross reference to CTS 4.0.5 for the Pressurizer Relief Valves was not retained in the corresponding ITS requirement. Requirements for inservice testing (4.0.5) are provided in ITS 5.5.8 and need not be referenced in individual specifications. These types of cross references are not used in the ITS.	3.4.11	4.4.4.1
3.4 A.14 (M)	A note has been added to applicability to clarify the restrictions for accumulator isolation. The ITS Note is consistent with the CTS action b for an unisolated accumulator, i.e., the actions place the unit outside the mode of applicability. The CTS Action has also been clarified to include this statement.	3.4.12	3.4.9.3.b
3.4 A.15 (M)	The CTS Action a and the associated footnotes were reformatted to incorporate the footnotes into the required actions.	3.4.12	3.4.9.3
3.4 A.16	Not used.		
3.4 A.17	The CTS Action requirements for two inoperable PORVs, failure to meet the requirements of an Action, or for an inoperable LTOP System for any other reason, were reformatted and collected into a single Action in the ITS.	3.4.12	3.4.9.3
3.4 A.18	The CTS requirement for an ANALOG CHANNEL OPERATIONAL TEST or ACOT for the PORV was revised consistent with the new ITS Section 1.1, definition of the corresponding ITS surveillance the CHANNEL OPERATIONAL TEST or COT which incorporates the key aspects of the ANALOG CHANNEL OPERATIONAL TEST. Any changes to the definition which are the result of the changes in Section 1.1, are described in the Discussion of Changes for that section.	(C) SR 3.4.12.5 (M) SR 3.4.12.6	4.4.9.3.1.a
3.4 A.19	Several CTS surveillance requirements have been combined into one ITS surveillance requirement.	SR 3.4.12.1	4.1.2.3.2, 4.1.2.4.2, 4.5.3.2 (M) 4.4.9.3.3
3.4 A.20	The CTS interval for verification that the RCS vent is properly maintained has been reformatted from an SR and footnote, to a SR with two Frequencies. The intervals retained in ITS remain the same.	(C) SR 3.4.12.3 (M) SR 3.4.12.4	4.4.9.3.2

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.4 REACTOR COOLANT SYSTEM

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.4 A.21	The CTS requirements regarding the RCS Controlled Leakage have been moved to a separate ITS specification for Seal Injection Flow.	3.5.5	3.4.6.2.e and 4.4.6.2.1.c
3.4 A.22	The CTS requirements regarding the RCS Pressure Isolation Valves and RHR interlock have been moved to a separate ITS specification for RCS Pressure Isolation Valve (PIV) Leakage.	3.4.14	3.4.6.2.f, 3.4.6.2 Action c, 4.4.6.2.2, and 4.5.2
3.4 A.23	The CTS requirements contained in the Steam Generator Specification were effectively retained as a surveillance requirement in the ITS RCS Operational LEAKAGE Specification.	3.4.13	3/4.4.5
3.4 A.24	The CTS Applicability was revised by the addition of a clarification that excludes the valves in the RHR flow path when the RHR is in operation. This change is consistent with normal plant operation and with the provisions of the CTS footnote to Table 3.4-1.	3.4.14	3.4.6.2.f
3.4 A.25	A Note was added to clarify that separate Condition entry is permitted for each RCS PIV flow path. The clarification provided by this note is consistent with the current practice.	3.4.14	3.4.6.2.f
3.4 A.26	A Note was added to clarify that systems affected by an inoperable PIV, and subsequent required isolation of a flowpath, are properly evaluated and the appropriate actions are initiated.	3.4.14	3.4.6.2.f
3.4 A.27	The CTS Table 3.4-1 list of RHR valves (located in the RHR shutdown cooling flow path) that are exempt from testing following actuation or flow through the valve was reformatted into an ITS surveillance note. The ITS includes a Note which indicates that testing of RCS PIVs located in the RHR flow path when in the shutdown cooling mode of operation are not required to be tested.	SR 3.4.14.1	4.4.6.2.2.d
3.4 A.28	The CTS exemption from the provisions of Specification 4.0.4 for entry into MODES 3 or 4 for surveillance testing of RCS PIVs was reformatted in to an ITS Note which indicates that the surveillance is not required to be performed in MODES 3 or 4.	SR 3.4.14.1	4.4.6.2.2

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.4 REACTOR COOLANT SYSTEM

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.4 A.29	A Note was added to the CTS to clarify that RCS PIVs actuated during performance of the surveillance do not have to be tested more than once if a repetitive test loop cannot be avoided. This change is consistent with the current interpretation and does not represent a change to the specifications.	SR 3.4.14.1	4.4.6.2.2
3.4 A.30	Action F.1 was added that directs the plant to immediately enter LCO 3.0.3 if all required RCS leak detection monitors are inoperable. The addition of this note accommodates the format of the ITS which includes individual Action conditions for each leak detection monitor and the ITS rules of TS usage which allow multiple Action Conditions to be applicable at the same time.	3.4.15	3.4.6.1
3.4 A.31	The CTS requirement for an ANALOG CHANNEL OPERATIONAL TEST (ACOT) for the RCS leak detection monitors was revised to a Channel Operational Test or COT consistent with the corresponding ITS term for this test requirement. The revision of this test definition was addressed in the discussion of changes for Section 1.0. "Definitions".	SR 3.4.15.2	4.4.6.1 and 4.3.3.1
3.4 A.32	The CTS limits on RCS specific activity have been moved from the LCO statement and Action B to the ITS surveillance requirements. Only the location of these limits within the TS has changed.	SRs 3.4.16.1 and 3.4.16.2	3.4.8
3.4 A.33	The Action requirements in the CTS applicable when the DOSE EQUIVALENT I-131 has been greater than 1 µCi/gm for > 48 hours or exceeds the limit provided in the figure have been reformatted consistent with the ITS presentation of this information.	3.4.16	3.4.8
3.4 A.34	The CTS Action requirements applicable when the DOSE EQUIVALENT I-131 is greater than 1 µCi/gm have been reformatted. The conditional surveillance requirement has been moved from the CTS table to the ITS Action A. In addition, the CTS 48 hour limit has been reformatted and explicitly identified in the TS.	3.4.16	3.4.8, Table 4.4-4
3.4 A.35	Not used.		

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.4 REACTOR COOLANT SYSTEM

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.4 A.36	The CTS Table format associated with the RCS specific activity has been revised consistent with the presentation of this information in the ITS. The CTS requirements are presented in ITS Actions and SRs.	SRs 3.4.16.1, 3.4.16.2, and 3.4.16.3, and 3.4.16 Actions	4.4.8, Table 4.4-4
3.4 A.37	The CTS Modes in which the 14 day surveillance of the DOSE EQUIVALENT I-131 must be performed were moved from the CTS table column titled "Modes in Which Sample and Analyses Required" to a Note in the corresponding ITS SR.	SR 3.4.16.2	Table 4.4-4
3.4 A.38	The CTS requirements for a radiochemical analysis of the reactor coolant to determine E-bar has been reformatted to match the ITS presentation of this information. The change re-organizes the requirements but does not include any technical revisions.	SR 3.4.16.3	Table 4.4-4
3.4 A.39	The detailed information in the CTS table describing the analysis for E-bar has been deleted. This information is redundant to the Definition for E-bar in ITS Section 1.0.	3.4.16	Table 4.4-4
3.4 A.40	The LCO requirement in CTS to maintain all RCS loops in operation has been explicitly clarified to read "Four RCS loops shall be OPERABLE and in operation." The addition of the word OPERABLE is consistent with the existing plant interpretation of this requirement, i.e. the RCS loops including the steam generators must be OPERABLE	3.4.4	3.4.1.1
3.4 A.41 (C)	The name of the sump monitor in the CTS has been changed to delete reference to "flow." This change clarifies that this monitor is a level monitor in the containment floor and equipment sump. Leakage rate or flow is actually calculated by a rate of change in level using the plant computer.	3.4.15	3.4.6.1
3.4 A.42	The CTS requirement that the reactor coolant DOSE EQUIVALENT I-131 $\leq$ 1.0 µCi/gm be verified following power changes > 15% in 1 hour when in MODES 1, 2, and 3 was revised to only require this verification in MODE 1. This change is based on the intent of the surveillance to ensure iodine remains within limit during normal operation and following fast power level changes when fuel failure is more likely to occur. Power level changes >15% cannot occur in MODES 2 and 3.	SR 3.4.16.2	Table 4.4-4

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.4 REACTOR COOLANT SYSTEM

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.4 A.43 (M)	The CTS Actions that take exception to declaring the PORVs inoperable due to inoperable block valve actions which require disabling the PORV were retained in the ITS Actions for one block valve inoperable. This exception is not necessary for two or three block valves inoperable since the actions do not require disabling the PORV for these subsequent inoperabilities.	3.4.11 Required Actions B.I and B.2	3.4.4 Actions e, f, and g
3.4 A.44	The CTS requirement for demonstrating the RCS PIVs Operable at least once per 18 months was revised in the corresponding ITS surveillance to "In accordance with the Inservice Testing Program and 18 months." The reference to the inservice testing program in the ITS SR is administrative since CTS SR 4.0.5 also requires testing in accordance with 10 CFR 50.55a, which specifies the inservice testing program requirements.	SR 3.4.14.1	4.4.6.2.2.a

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.5 EMERGENCY CORE COOLING SYSTEM

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.5 A.1	The CTS has been reformatted and renumbered in accordance with NUREG-1431. As a result, the Technical Specifications are more readily readable, and therefore understandable, by plant operators as well as other users. The reformatting, renumbering, and rewording process serves only to clarify the CTS requirements and involves no technical changes to the CTS.	Section 3.5	3/4.5
3.5 A.2	The CTS details regarding the acceptance criteria limits for OPERABILITY of the ECCS Accumulators were moved from the CTS LCO statement to the associated Surveillance Requirements.	SR 3.5.1.1 through SR 3.5.1.5	3.5.1.1.a, b, c, and d (M); 3.5.1.a, b, c, and d (C)
3.5 A.3	Not used.		
3.5 A.4 (C)	The CTS Actions which require the unit to be placed in Hot Shutdown in 12 hours if the required actions are not met have been revised to require RCS pressure to be reduced to less than 1000 psig. This change makes the Required Action consistent with the mode of Applicability of the LCO (≥1000 psig). This change is considered administrative since once the unit is out of the mode of applicability, the actions are no longer applicable.	3.5.1 Actions	3.5.1 Actions a and b (C); 3.5.1.1 Actions a and b (M)
3.5 A.5	The CTS was revised by the addition of an action requiring immediate entry into LCO 3.0.3 when the system conditions are such that the unit has two or more inoperable accumulators. This addition provides a clarification consistent with the CTS and does not represent a technical change.	3.5.1	3.5.1
3.5 A.6	The CTS Surveillance Requirement that specifies a verification of the boron concentration for each accumulator when a makeup of greater than or equal to a certain amount has occurred was modified by the addition of a clarification in the form of a note which clearly states that only affected accumulator(s) need to be verified after the makeup occurs.	SR 3.5.1.4	4.5.1.1.b (C) 4.5.1.1.1.b (M)
3.5 A.7	The CTS Surveillance Requirement for the RHR interlock is moved to a Specification in the RCS section of the ITS. This requirement is not considered part of the ECCS system and is related more closely with the requirements associated with the RCS system. No technical change is involved with this move.	3.4.14	4.5.2.d.1

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.5 EMERGENCY CORE COOLING SYSTEM

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.5 A.8	The CTS Surveillance Requirement for automatic valve position verification has been revised to exclude valves that are locked, sealed or otherwise secured in position. This change is considered administrative since any valve that is secured in its required safety position is not an "automatic" valve meeting the intent of the CTS requirement.	SR 3.5.2.5	4.5.2.e.1
3.5 A.9	The CTS Surveillance Requirements which specify that an actuation test signal be used during testing were revised to clarify that an actual as well as a simulated test signal may be used to meet the Surveillance Requirements. This change clarifies that taking credit for unplanned actuations is acceptable if sufficient information is collected to satisfy the surveillance test requirements.	SRs 3.5.2.5 and 3.5.2.6	4.5.2.e.1 and 4.5.2.e.2
3.5 A.10	The CTS footnote which contains a restriction on the number of ECCS pumps which may be operable was moved to the ITS RCS section which provides the controls associated with the RCS low temperature overpressure protection functions. This change only reorganizes the CTS requirements consistent with the ITS.	3.4.12	3.5.3 and 4.5.3.2
3.5 A.11	The CTS Surveillance Requirement has been revised to identify the specific requirements from CTS 3.5.2 which are applicable during MODE 4. A Note has also been included to clarify the current practice and interpretation of allowing credit to be taken for portions of an ECCS subsystem as an OPERABLE subsystem although they have been manually aligned to function as part of an RHR system in operation. These changes are consistent with the allowance to take manual action in MODE 4 to align and actuate an ECCS system and do not represent a technical change.	SR 3.5.3.1	4.5.3.1
3.5 A.12	The CTS details regarding the acceptance criteria limits for OPERABILITY of the RWST were moved from the CTS LCO to the Surveillance Requirements. The requirements remain unchanged and only their location is different, therefore, this is an administrative change	SRs 3.5.4.1 - 3.5.4.3	3.5.4.a, b, c, and d
3.5 A.13	The CTS requirements for operational leakage related to reactor coolant pump seal injection have been reformatted and retained as a separate ITS LCO for reactor coolant pump seal injection in the ECCS section of the ITS.	3.5.5 and SR 3.5.5.1	3.4.6.2.e and 4.4.6.2.1.c

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.5 EMERGENCY CORE COOLING SYSTEM

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.5 A.14 (M)	The CTS Note that allows valves to be repositioned during RCS PIV testing resulting in both Safety Injection or RHR Subsystems being inoperable and for placing the RHR system in service was reformatted and retained as a note in ITS LCO for the SI subsystem and in ITS surveillance for the RHR subsystem.	3.5.2 and SR 3.5.2.1	4.5.2.a
3.5 A.15	Not used.		

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.6 CONTAINMENT SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.6 A.1	The CTS has been reformatted and renumbered in accordance with NUREG-1431. As a result, the Technical Specifications are more readily readable, and therefore understandable, by plant operators as well as other users. The reformatting, renumbering, and rewording process serves only to clarify the CTS requirements and involves no technical changes to the CTS.	3.6	3/4.6
3.6 A.2	The CTS Surveillance Requirement 4.6.1.1.b which requires each containment air lock to be in compliance with Specification 3.6.1.3 and requires the containment air lock to be OPERABLE is redundant to CTS 4.6.1.3 and was eliminated. The containment air lock is addressed by CTS 3.6.1.3 and retained as ITS LCO 3.6.2.	3.6.2	4.6.1.1.b
3.6 A.3	The CTS LCOs for "Containment Integrity", "Containment Leakage", and "Containment Vessel Structural Integrity" were combined into one Technical Specification and retained as the ITS LCO for, "Containment." As a result, two surveillance requirements were created from the combination of the current requirements. The new ITS LCO and SRs maintain the CTS overall technical requirements to perform leak testing and to verify structural integrity.	3.6.1, SR 3.6.1.1 and SR 3.6.2.1	3.6.1.1, 3.6.1.2, and 3.6.1.6
3.6 A.4	The CTS Action requirements for entry into LCO 3.0.3 when the requirements of the LCO are not met during the modes of applicability were revised to allow 1 hour to restore containment to operable status and 6 hours to be in MODE 3. This is equivalent to the CTS LCO 3.0.3 requirements that allow 7 hours to be in MODE 3.	3.6.1 Actions	3.6.1.2 and 3.6.1.6 Actions
3.6 A.5	Notes, affecting the CTS Actions for containment air locks were added. Note 2 was added to allow separate condition entry for each containment air lock. This Note provides explicit instructions for proper application of the actions for Technical Specification compliance. In conjunction with proposed Specification 1.3 - "Completion Times," this Note provides direction consistent with the intent of the existing Actions for inoperable containment air locks. Note 3 provides guidance to direct the user to the LCO for containment, if the air lock leakage rate results in exceeding the limit of L_a.	3.6.2 Actions	3.6.1.3 Actions
3.6 A.6	The CTS Action for inoperable air lock doors was revised to clarify that the Action may be applied to one or more air locks. This change clarifies but does not alter the CTS requirements.	3.6.2 Action A	3.6.1.3 Action a

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.6 CONTAINMENT SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.6 A.7	A Note was added to the CTS Actions to clarify that the actions for a single inoperable airlock door are not applicable if both doors, in the same air lock, are inoperable. When this condition exists, separate actions are specified which must be entered. Note 1 provides guidance to avoid contradictory required actions and does not change the technical requirements of the CTS.	3.6.2 Action A	3.6.1.3, Action a
3.6 A.8	The CTS Action requirement providing an exception to CTS Specification 3.0.4 was deleted. This exception is no longer required because the Actions retained in ITS 3.6.2 allow continued operation for an unlimited period of time and therefore, ITS 3.0.4 allows Mode changes without an exception.	3.6.2 Actions	3.6.1.3 Action a.4
3.6 A.9	The specific details of the CTS Surveillances were replaced by a more general but equivalent requirement to perform airlock leak rate testing as required by 10 CFR 50 Appendix J, Option A, and two Notes. The Notes were added to clarify for the user that: 1) an inoperable door does not invalidate a successful performance of an overall air lock leakage rate test, and 2) results of air lock testing will be evaluated for impact on overall containment leakage rate requirements. No technical requirements are made to the CTS by these clarifications.	SR 3.6.2.1	4.6.1.3.a and b
3.6 A.10	Notes were added to the Actions for "Containment Isolation Valves". Notes 1, 3, and 4 provide guidance and clarification for the use of the TS. Note 1 allows for intermittent unisolation of an inoperable penetration flow path(s) under administrative controls consistent with CTS 4.6.1.1.a. This is allowed for all penetration flow paths except containment purge valves for the lower compartment and instrument room. Note 3 requires the entry into the applicable Conditions and Required Actions for systems made inoperable by an inoperable containment isolation valve. Note 4 requires the applicable Condition and Required Action of LCO 3.6.1, "Containment," to be evaluated, when an isolation valve leakage rate results in exceeding the overall containment leakage rate. These notes provide clarification and guidance and do not altered the technical requirements of the CTS.	3.6.3 Actions	3.6.3 Actions

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.6 CONTAINMENT SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.6 A.11	Note 2 was added to the CTS requirements for Containment Isolation valves, allowing separate condition entry for each inoperable containment isolation valve. This Note provides explicit instructions for proper application of the actions for Technical Specification compliance. In conjunction with the proposed Specification 1.3 - "Completion Times," this Note provides direction consistent with the intent of the existing Actions for the containment isolation valves.	3.6.3 Actions	3.6.3 Actions
3.6 A.12	The CTS Action was revised to clarify that the actions for inoperable containment isolation valves apply on a penetration flow path basis. The term "flow path" is now used to clearly encompass all types of isolation valves and penetration combinations. No technical changes are modified by the addition of this wording.	3.6.3 Action	3.6.3 Action
3.6 A.13	The phrase "except for purge valve or reactor building bypass leakage not within limit" was added to the CTS Actions for inoperable penetration flow paths. This addition clarifies that purge penetration flow paths and reactor building bypass leakage are addressed by separate conditions. No technical requirements are changed by this addition.	3.6.3 Action	3.6.3 Action
3.6 A.14	The CTS Action requirements which state, "restore the inoperable valve(s). . . " were deleted. The option to restore a system or component to operable status is always available in accordance with LCO 3.0.2 and does not need to be specifically stated. This redundant CTS wording is deleted without altering any technical requirements.	3.6.3 Actions	3.6.1.9 Action c 3.6.3 Action a
3.6 A.15	The CTS Actions for penetration flow paths were separated into actions for penetrations with two containment isolation valves (ITS 3.6.3 Action A) and those with one containment isolation valve and a closed system (ITS 3.6.3 Action C). The division of the CTS Action into two parts conforms with the ITS format and is not a technical change.	3.6.3 Actions A and C	3.6.3 Actions
3.6 A.16	An Action was added to the CTS for two valves in a penetration flow path being inoperable. Currently, if two valves in a penetration flow path are inoperable, CTS LCO 3.0.3 would be required to be entered. The new Action provides a Completion Time of 1 hour to isolate the penetration. This time is the same allowed by CTS LCO 3.0.3 before a power reduction is required. Therefore, this addition only serves to conform with the ITS presentation of these requirements and does not introduce any technical changes.	3.6.3 Action B	3.6.3 Actions

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.6 CONTAINMENT SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.6 A.17 (M)	The CTS Action which provides an exception to CTS Specification 3.0.4 if the affected penetration is isolated and the associated system is declared inoperable, was deleted. This exception is no longer required because the ITS Actions require any inoperable penetration to be isolated, the affected system to be declared inoperable and allow continued operation. Since ITS LCO 3.0.4 allows MODE changes if the Actions allow continued operation, the CTS exception becomes redundant and is no longer required to achieve the same result.	3.6.3 Actions	3.6.3 Action e
3.6 A.18	The CTS Surveillance Requirements for valve operability verification are revised to include a clarification that valves which are locked, sealed or otherwise secured in their required safety position, are not required to be tested. The proposed requirement does not change the technical content or validity of the required testing which serves to demonstrate the valves actuate to the required safety position.	SRs 3.6.3.7, 3.6.6.3, 3.6.3.3, and 3.6.3.4,	4.6.3.2, 4.6.1.1.a, and 4.6.2.c
3.6 A.19	Two CTS LCOs were combined into ITS LCO 3.6.3," Containment Isolation Valves". The two CTS LCOs duplicate the requirements for the valves used for containment penetration flow path isolation. Since the wording of CTS LCO 3.6.1.9 is repeated in the Action, it is eliminated. Minor wording modifications are made in combining the LCOs, but these changes do not alter the technical requirements.	3.6.3	3.6.3 and 3.6.1.9
3.6 A.20	Not used.		
3.6 A.21	Not used.		
3.6 A.22 (C)	The setpoints for the Containment Pressure Control System (CPCS) specified in CTS were deleted. The setpoints are already specified in CTS 3.3.2 and retained in ITS 3.3.2. The corresponding ITS surveillance requirements provide the specific requirements to be verified and refer to the start permissive and terminate signals of the CPCS.	SRs 3.6.6.5, 3.6.6.6, 3.6.8.3, 3.6.11.6 and 3.6.11.7	4.6.2.c.3, 4.6.2.c.4, 4.6.2.c.5, 4.6.5.6.2.a, 4.6.5.6.2.b, and 4.6.5.6.1.f
3.6 A.22 (M)	The CTS requirements that system functions in response to the Containment Pressure Control System (CPCS) be verified were moved to the corresponding ITS surveillance requirements which provide the specific requirements to be verified and refer to the start permissive and terminate signals of the CPCS.	SRs 3.6.6.5, 3.6.6.6, 3.6.8.3, 3.6.11.6 and 3.6.11.7	4.6.2.c.3, 4.6.5.6.2, and 4.6.5.6.1.f

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.6 CONTAINMENT SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.6 A.23	Not used.		
3.6 A.24	The CTS Action which allows the annulus ventilation system heaters to be inoperable up to 7 days and allows continued operation of the system provided a report is made to the NRC within 30 days was reformatted (to refer to another section for the report requirements) and retained in the corresponding ITS Action. No technical changes were introduce by this format change.	3.6.10 Action B	3.6.1.8 Action b
3.6 A.25	Not used.		
3.6 A.26	The details of the CTS Surveillance Requirement that specifies the testing of annulus ventilation filters in accordance with Regulatory Guides and ASTM codes have been moved to the Administrative Controls, ITS Chapter 5.0. A new surveillance was added to CTS to require testing in accordance with the Ventilation Filter Testing Program as described in Chapter 5.0. The actual testing requirements remain unchanged.	SR 3.6.10.2 5.5.11	4.6.1.8.b, c, d.1, d.5, e, and f
3.6 A.27	A Note was added to the CTS which permits separate condition entry for each ice condenser door. This change is necessary to provide explicit instructions for proper application of the ACTIONS for Technical Specification compliance. In conjunction with ITS 1.3, "Completion Times," this Note provides direction consistent with the intent of the existing ACTIONS for inoperable ice condenser door and is therefore, considered administrative.	3.6.13 Actions	3.6.5.3 Actions
3.6 A.28	Not used.		
3.6 A.29	Not used		

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.6 CONTAINMENT SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.6 A.30	The CTS Action requirement for inoperable or open containment system access doors or equipment hatches to be restored to OPERABLE status "or" closed (as applicable) depending on whether a hatch or door was inoperable was revised to require them to be restored to OPERABLE status "and" closed. The change removes the ambiguity and provides clarification that the door or hatch must be closed to maintain divider barrier integrity and does not specify any new requirement. This wording change does not alter the existing requirements established in the associated surveillance requirements.	3.6.14 Actions A and B	3.6.5.5 Actions
3.6 A.31	The CTS Actions for an inoperable divider barrier seal to be restored to OPERABLE status prior to increasing the Reactor Coolant System temperature above 200 °F were revised by the addition of an Action for an inoperable seal above 200°F. The new ITS Action requires an inoperable seal to be restored to OPERABLE status within 1 hour or requires a shutdown which is the same time and Actions required by LCO 3.0.3 which would be applicable under the CTS for the same condition. Therefore, no technical change is introduced.	3.6.14 Action C	3.6.5.9 Action
3.6 A.32	The CTS Actions for an inoperable floor drain to be restored to OPERABLE status prior to increasing the Reactor Coolant System temperature above 200 °F were revised by the addition of an Action for an inoperable seal above 200 °F. The new ITS Action requires an inoperable drain to be restored to OPERABLE status within 1 hour or requires a shutdown. The CTS would require entry into LCO 3.0.3 which would require the same Actions as the new ITS Action. Therefore, no technical change is introduced	3.6.15 Actions A and B	3.6.5.7 Action
3.6 A.33	Not used.		
3.6 A.34	The requirement in the CTS for bypass leakage testing on a 24 month basis during applicable Types B and C testing has been revised. The frequency in the ITS is in accordance with 10 CFR 50 Appendix J, as modified by approved exemptions. The proposed change is considered administrative since 10 CFR 50 Appendix J establishes a maximum interval of 24 months for Types B and C testing, and therefore, maintains the CTS requirement.	SR 3.6.3.8	4.6.1.2.e (C) 4.6.1.2.f (M)

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.6 CONTAINMENT SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.6 A.35	The CTS requirement that the structural integrity of the reactor building be determined during the shutdown for each Type A containment leakage rate test or if the Type A test is performed at 10 year intervals, two additional inspections shall be performed at approximately equal intervals during shutdowns between Type A tests was revised to a Frequency of 40 months. Since the station performs Type A tests every 10 years the frequency of 40 months was established since it is equivalent to one inspection performed every 10 years and two other inspections performed at equal intervals within that 10 years. Therefore, the original CTS requirement is maintained.	SR 3.6.16.3	4.6.1.7
3.6 A.36	Not used.		
3.6 A.37 (M)	The CTS requirement that 32 of 33 hydrogen igniters be operable on each train was revised to require 34 igniters per train to be operable. The actual design contains 35 igniters per train. This change simply corrects an inadvertent error in the CTS. The number of igniters was increased as discussed in SER Supplement 7, Attachment C, after the first refueling outage of each unit.	SR 3.6.9.1	4.6.4.3.a
3.6 A.38	The CTS requirements for reactor building bypass leakage limits including the associated actions and surveillance requirements were combined with the containment isolation valve requirements in CTS 3.6.3. These changes maintain the existing technical requirements.	3.6.3 Action D, and SR 3.6.3.7	3.6.1.2.c and 4.6.1.2.e (C) and 4.6.1.2.f (M)

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.7 PLANT SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.7 A.1	The CTS has been reformatted and renumbered in accordance with NUREG-1431. As a result, the Technical Specifications are more readily readable, and therefore understandable, by plant operators as well as other users. The reformatting, renumbering, and rewording process serves only to clarify the CTS requirements and involves no technical changes to the CTS.	Section 3.7	3/4.7
3.7 A.2	A Note was added to the CTS Actions that allows separate condition entry for each main steam safety valve (MSSV). This Note provides an explicit clarification of the proper application of the ITS Actions. In conjunction with ITS 1.3, "Completion Times," this Note provides direction consistent with the intent of the existing Actions for the MSSVs.	3.7.1	3.7.1.1
3.7 A.3	The CTS Action (Specification 3.0.4 is not applicable) was deleted and a Note was added to the affected ITS SR which effectively provides the same allowance as the CTS Action.	SR 3.7.1.1	3.7.1.1 Action c (M), Action b (C)
3.7 A.4 (M)	The CTS Action provides an allowance to operate in a three loop configuration and have one or more MSSVs inoperable, including CTS Table 3.7-2 and notes with * and **. The plant is not licensed to operate with less than four loops in operation. Therefore, the action is not needed and was eliminated.	3.7.1	3.7.1.1 Action b
3.7 A.5 (M)	The CTS Action requires the plant to be placed in Cold Shutdown (Mode 5) within the following 30 hours if an inoperable MSSV is not returned to Operable or the Power Range Neutron Flux High Trip Setpoints are not reduced in accordance with Table 3.7-1. The applicability of the specification for the MSSVs is Modes 1, 2, and 3. After placing the plant in Mode 4, the MSSVs are not longer required, therefore, the Action to be in Mode 5 is not required and was deleted.	3.7.1	3.7.1.1 Action a
3.7 A.6	Not used.		
3.7 A.7	A Note was added to the CTS Actions to allow separate condition entry for each main steam isolation valve (MSIV) in Modes 2 and 3. This Note provides an explicit clarification for proper application of the Actions for Technical Specification compliance.	3.7.2 Action C	3.7.1.4

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.7 PLANT SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.7 A.8	The allowance provided in the CTS Actions for Modes 2 and 3 and for Specification 3.0.4 not applicable, has been replaced by a note in the affected ITS SR and by the general rules of TS usage in the ITS.	SR 3.7.2.1	3.7.1.4
3.7 A.9	A portion of the CTS Actions were moved to the ITS Applicability to allow the MSIVs to be inoperable, if the valves are closed in Modes 2 and 3.	3.7.2	3.7.1.4
3.7 A.10 (C)	The CTS Actions that require the Residual Heat Removal (RHR) loop to be placed in operation for decay heat removal if the plant is placed in Hot Shutdown due to the inoperability of a steam generator power operated relief valve (SG PORV) have been reworded to specify that in Mode 4, the steam generator, with an inoperable PORV, will not be relied upon for heat removal. This change is consistent with placing the unit outside the mode of applicability specified in the CTS.	3.7.4	3.7.1.6 Actions a and b
3.7 A.11	The CTS allowance which states that the provisions of Specification 4.0.4 are not applicable for entry into Mode 3 was revised to be a Note which states that the Surveillance is not required to be performed until 24 hours after the appropriate pressure is reached in the steam generators. This Note serves the same purpose as the more general CTS exception to 4.0.4.	SR 3.7.5.2	(C) 4.7.1.2.1.b.2 (M) 4.7.1.2.b.2
3.7 A.12	Not used.		
3.7 A.13	The CTS surveillances for verification of non-automatic and automatic valves were combined into one ITS surveillance which includes the two steam supply valves for the turbine driven Auxiliary Feedwater (AFW) pump as well.	SR 3.7.5.1	(C) 4.7.1.2.1a 1) and 2) (M) 4.7.1.2.a 1) and 2)
3.7 A.14	The CTS requirement that corrective action be initiated immediately to restore an AFW pump to Operable status, if three AFW pumps are inoperable was revised by the addition of a Note in the corresponding ITS Action that states, LCO 3.0.3 and all other LCOs Required Actions requiring plant shutdown are suspended until one AFW train is restored to Operable. This note provides additional clarification consistent with the intent of the CTS.	3.7.5 Action D	3.7.1.2 Action c

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.7 PLANT SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.7 A.15	A Note was added to the CTS SR to clarify a question of inoperability of the Component Cooling Water System (CCW). The ITS Note states that a CCW train should not be declared inoperable if flow is isolated to a required component. The addition of the Note does not modify the technical requirements and only serves to provide additional clarification.	(C) SR 3.7.7.1 (M) SR 3.7.6.1	4.7.3.a
3.7 A.16	A Note was added to CTS SR to clarify a question of inoperability of the Nuclear Service Water System (NSWS). The ITS Note states that a NSWS train should not be declared inoperable if flow is isolated to a required component. The addition of the Note does not modify the technical requirements and only serves to provide additional clarification.	(C) SR 3.7.8.1 (M) SR 3.7.7.1	4.7.4.a
3.7 A.17	A Note was added to the CTS requirements for the Nuclear Service Water System as a reminder to enter applicable Conditions and Required Actions for emergency diesels or residual heat removal loops made inoperable by an inoperable service water train. A similar Note was added to the CTS requirements for the CCW system for the affected RHR loops. The addition of the Notes does not modify the technical requirements of the CTS.	(C) 3.7.7 and 3.7.8 (M) 3.7.6 and 3.7.7	3.7.3 and 3.7.4
3.7 A.18 (M)	CTS Actions contain the requirement that if only one of the shared portions of the units nuclear service water system loops are Operable, the required shared portion on the loop must be returned to Operable within 72 hours or both units must be shutdown. This requires that a component that would affect NSWS loops on both units must be returned to Operable within the 72 hours action time. This requirement is revised consistent with the ITS format and rules of usage. The corresponding ITS Actions are structured to incorporate this concept within the requirement of Action A for each unit.	3.7.8 Action A	3.7.4 Action b
3.7 A.19 (C)	CTS Actions contain requirements for a combination of units in Modes 1, 2, 3, and 4. These combinations are redundant with the conversion to the ITS and the division of the Technical Specifications on a unit basis and were deleted. The technical requirements for two NSWS loops (or headers) to be Operable for a unit in Modes 1, 2, 3, or 4, for each unit is effectively maintained in the individual TS for each unit.	3.7.8	3.7.4 Action a, b, and c

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.7 PLANT SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.7 A.20 (C)	The CTS SR note that states that for common or shared portions of the NSWS with either unit in Modes 1, 2, 3, or 4, the SRs must be continued to be met with either unit in the required modes and that surveillance Requirements on portions of the system, not shared, need only be met when that specific unit is in Modes 1, 2, 3, or 4 was deleted. The CTS note is redundant to the rules of usage for surveillance requirements defined in ITS section 3.0.	3.7.8	4.7.4
3.7 A.21	Not used.		
3.7 A.22	Not used.		
3.7 A.23	Not used.		
3.7 A.24	The CTS LCO does not specifically provide for the inoperability of two Control Room Area Ventilation Systems (CRAVS) in MODES 1-4, therefore, the plant would be required to enter CTS LCO 3.0.3. The CTS Actions were revised by the addition of ITS Action E which requires LCO 3.0.3 to be entered if two trains of CRAVS are inoperable in MODES 1-4. This explicit requirement to enter LCO 3.0.3 resolves any interpretational issues due to the number of Action Conditions in the ITS and provides a clarification consistent with the intent of the CTS.	(C) 3.7.10 (M) 3.7.9	3.7.6
3.7 A.25	The two CTS Actions for Modes 1, 2, 3, and 4 and for Modes 5 & 6 for inoperable ventilation system heaters were reformatted to a single ITS Action. No technical changes were made to the CTS Actions.	(C) 3.7.10 Action F (M) 3.7.9 Action F	3.7.6 Action b and d
3.7 A.26	The presentation of the CTS Action requirement to suspend all operations involving Core Alterations when both control room area ventilation systems are inoperable was revised to be part of the ITS Applicability as well as the Actions. This reformat serves to clarify the CTS Actions and related Applicability for this LCO.	Applicability and Action D in (C) 3.7.10 (M) 3.7.9	3.7.6 Action b

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.7 PLANT SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.7 A.27 (C)	The CTS Action for Modes 5 and 6 that requires a CRAVS train to be placed in service when one CRAVS train is inoperable was revised by the addition of an ITS note. The ITS note requires that the train placed in service be placed in the High Chlorine gas protection mode if the chlorine detectors are also inoperable. The requirement is necessary since the chlorine detectors are no longer required to be operable within the TS. This note ensures that the CRAVS is placed in a conservative mode of operation and is consistent with the CTS requirements for chlorine gas protection.	3.7.10 Actions	3.7.6 Action a
3.7 A.28	Not used.		
3.7 A.29	The requirements of the CTS Actions and Surveillance Requirements regarding the testing of ventilation filters in accordance with Regulatory Positions and ASTM codes have been moved to the Programs section of the ITS Chapter 5.0, "Administrative Controls". The applicable ITS surveillances are constructed to require the testing in accordance with the Ventilation Filter Testing Program as described in Chapter 5.0. No technical changes to the requirements were made.	(C) SR 3.7.10.2 (M) SR 3.7.9.2	3.7.6
3.7 A.30 (M)	The CTS SR requirements for testing the control room at a positive pressure of $\geq$ 0.125 inch (water gauge) and flow $\leq$ 2200 cfm were revised by the addition of the clarification, "compared to the surrounding area:. The designation of surrounding area is a clarification of the existing design requirements for operability.	SR 3.7.9.4	SR 4.7.6 e.3
3.7 A.31	The exception to Specification 3.0.4 in the CTS Action for Modes 5 and 6 has been deleted. The required actions of the ITS provide for continued operation for an unlimited period of time, therefore, the exception is not necessary under the rules of ITS LCO 3.0.4.	(C) 3.7.10 (M) 3.7.9	3.7.6 Action c
3.7 A.32	Not used.		
3.7 A.33	The CTS Modes 5 & 6 Action requirement that all operations involving Core Alterations must be suspended when both control room area ventilation systems, used for temperature control, are inoperable was revised to be included in the ITS Applicability as well as ITS Actions C and D. This represents a change in format and presentation only.	Applicability and Actions for (C) 3.7.11 (M) 3.7.10	3.7.6 Action b

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.7 A.34 (C)	The CTS surveillance requirement for the control room and nearby area temperature was revised into a separate LCO for "Control Room Area Chilled Water Systems (CRACWS)." The creation of a new LCO for this requirement is a change in format and presentation. The limits and intent of the CTS SR were retained.	3.7.11	3.7.6, 4.7.6 a.
3.7 A.35 (C)	The CTS Action requirements for inoperable ventilation system heaters were reformatted consistent with the ITS method of referencing a special report contained in Section 5.0 instead of stating the reporting requirements in the Action. The technical requirements of the Action were retained.	3.7.12 Action C	3.7.7 Action b
3.7 A.36	The CTS Actions and Surveillance Requirements for the testing of ventilation filters in accordance with Regulatory Positions and ASTM codes have been moved to the Programs section of the ITS Chapter 5.0, "Administrative Controls". The applicable ITS SR is constructed to require the testing in accordance with the Ventilation Filter Testing Program as described in Chapter 5.0. No technical changes to the requirements were made.	(C) SR 3.7.12.2 (M) SR 3.7.11.2	3.7.7
3.7 A.37	The CTS SR requirement for an actuation test signal to be used during testing was revised to allow an actual, as well as a simulated test signal, to meet the Surveillance Requirement in ITS. The acceptance criteria of the surveillance remains unchanged and unaffected by this revision.	(C) SR 3.7.12.3 (M) SR 3.7.11.3	4.7.7 d.2
3.7 A.38	The CTS Action requirements for the Control Room Area Ventilation in Modes 1, 2, 3, and 4 were revised by the addition of an Action to enter LCO 3.0.3 with the loss of 2 CRACWS trains. This addition does not change the CTS which implicitly required the same Action.	Action E (C) 3.7.11 (M) 3.7.10	3.7.6
3.7 A.39	The CTS requirement for the Operable Fuel Handling Ventilation Exhaust System (FHVES) to be operating has been reformatted in the ITS LCO and stated as one train of FHVES shall be Operable and in operation. The change maintains the technical requirements of the CTS.	(C) 3.7.12 (M) 3.7.11	4.9.11.1
3.7 A.40 (C)	The CTS Action requirements for inoperable ventilation system heaters were reformatted consistent with the ITS method of referencing a special report contained in Section 5.0 instead of stating the reporting requirements in the Action. The technical requirements of the Action were retained.	3.7.13 Action B.	3.9.11

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.7 A.41	Not used.		
3.7 A.42 (C)	The CTS surveillance requirement for the flow rate limit was revised by the addition of the specific flow rate of ≤ 18,221 cfm for the FHVES system. This flow rate was derived from the operating system flow rate requirements of CTS surveillance b, d, e, and f, which states a limit of 16,565 cfm ± 10%, or 16,565 plus 1,656, or 18,221 cfm. This addition provides a clarification of the total required flow rate and maintains the technical requirements of the CTS.	SR 3.7.13.4	4.9.11.2.d.1 and 2
3.7 A.43	The CTS Actions and Surveillance Requirements for the testing of ventilation filters in accordance with Regulatory Positions and ASTM codes have been moved to the Programs section of the ITS Chapter 5.0, "Administrative Controls". The applicable ITS SR is constructed to require the testing in accordance with the Ventilation Filter Testing Program as described in Chapter 5.0. No technical changes to the requirements were made.	(C) SR 3.7.13.3 (M) SR 3.7.12.3	4.9.11.2
3.7 A.44	Not used.		
3.7 A.45	The CTS Action requirement for the reduction of the Power Range Neutron Flux Trip Setpoints within 4 hours of determining a main steam safety valve is inoperable was revised by the addition of an Action to reduce power to less than or equal to the applicable % RTP listed in Table 3.7.1-1 within 4 hours. Implicit within the CTS action, is the reduction of Thermal Power below the setpoint settings, therefore, the addition of the ITS Action does not introduce a technical change.	3.7.1 Action A	3.7.1.1 Action a
3.7 A.46	Not used.		
3.7 A.47	Not used.		
3.7 A.48	The actions of CTS for Modes 5 and 6 have been modified to include an allowance to suspend core alterations and movement of irradiated fuel rather than starting the operable CRAVS train. This action effectively removes the unit from the mode of applicability and eliminates the requirement to start the CRAVS train.	(C) 3.7.10 (M) 3.7.9	3.7.6.a

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.7 A.49	The CTS requirements for containment isolation valves, (specifically the main feedwater isolation valves (MFIVs) and the main feedwater to auxiliary feedwater nozzle bypass valves) were moved to section 3.7 as a new ITS LCO which establishes requirements for all main feedwater valves which receive an MFW isolation signal. The requirements in the new LCO are consistent with the existing requirements in CTS 3.6.3 for their containment isolation function.	3.7.3	3.6.3

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
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DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.8 A.1	The CTS have been reformatted and renumbered in accordance with the STS. As a result, the TS are easier to read and understand by plant operators as well as other users. The reformatting, renumbering, and rewording process serves only to clarify the CTS requirements and involves no technical changes to the CTS.	3.8	3/4.8
3.8 A.2	The requirement for the automatic load sequencers for Trains A and B is added to the CTS LCO. The OPERABILITY of the sequencers is required by the SRs in CTS 4.8.1.1.2 to demonstrate OPERABILITY of the diesel generators. Therefore, this change only clarifies the CTS operability requirements.	LCO 3.8.1	4.8.1.1.2.e (M) 4.8.1.1.2.g (C)
3.8 A.3	The CTS action requirement to periodically (within 1 hour and every 8 hours thereafter) demonstrate the OPERABILITY of the remaining AC electrical power sources when one offsite circuit and one diesel generator (DG) are inoperable is retained in the individual ITS Actions for an inoperable offsite circuit and for an inoperable DG. In accordance with ITS Section 1.3, "Completion Times," the ITS would require entering both these Actions and thus require perfoming the verification at the specified frequency, if the condition of an inoperable offsite circuit and DG existed. Thus the specific Action for this conditon, Action D, need not explicitly contain this CTS action requirement.	3.8.1 Required Actions A.1 and B.1; and Action D	3.8.1.1 Action b.1
3.8 A.4	Not used.		
3.8 A.5	A Note was added to CTS Actions to clarify that entry in the applicable Conditions and Required Actions of ITS LCO 3.8.9, "Distribution Systems - Operating" is required for any train that becomes de-energized with the loss of an offsite circuit and a DG. This change is administrative because the note reflects the CTS 3.0.1 requirement to meet the associated action requirements for LCOs that are not met - in this case the action requirements for any denergized AC distribution bus. This note is needed because the ITS contains a new provision, LCO 3.0.6, which would only require entering the Actions of ITS 3.8.1. The ITS 3.8.1 Note to Action D which requires entering ITS LCO 3.8.9 is an exception to ITS 3.0.6 See Table M, DOC 3.0-M.3 regarding ITS LCO 3.0.6.	3.8.1 Action D Note	3.0.1 3.8.1.1 Action b

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.8 ELECTRICAL POWER SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.8 A.6 (C)	In the event both an offsite circuit and a DG are inoperable, and one of these ac sources are restored to Operable status, the CTS reminds the user to continue to follow CTS 3.8.1.1 Action a (ITS Action A) if the DG is restored, or CTS 3.8.1.1 Action d (ITS Action B) if the offsite circuit is restored. This explicit reminder is unnecessary in the ITS and is omitted from corresponding ITS 3.8.1 Action D because the action requirements of ITS Action A or B, as appropriate, would continue to apply until the one remaining ac source is restored, in accordance with ITS Section 1.3, "Completion Times."	3.8.1 Actions A, B, and D	3.8.1.1 Action b.3
3.8 A.7	The CTS action requirements for one DG inoperable are simplified. The ITS requires verification that redundant required equipment is OPERABLE. This change is administrative because the ITS language is equivalent to the more detailed CTS language which is to verify the Operability of all required systems, subsystems, trains, components and devices, depending on the remaining DG, including the steam driven auxiliary feedwater pump if the plant is in Modes 1 through 3 with main steam pressure greater than 900 psig.	3.8.1 Required Action B.2	3.8.1.1 Action c
3.8 A.8	In the event two DGs are inoperable, the CTS requires demonstrating the OPERABILITY of two offsite AC circuits by performing a surveillance, CTS 4.8.1.1.1.a, within 1 hour and at least once per 8 hours thereafter. ITS 3.8.1 effectively retains this action requirement in the Action provided for one DG inoperable because it requires the performance of the corresponding ITS SR 3.8.1.1 at the same frequency whenever any DG is inoperable.	3.8.1 Required Action B .1	3.8.1.1 Action f
3.8 A.9	The CTS action requirements were revised by the addition of a new ITS Action for the DG sequencers. This Action is based on the CTS surveillance requirements which specified the sequencer operability and on the corresponding CTS Action for an inoperable DG and offsite circuit. The addition of this explicit action requiremnt for an inoperable sequencer is an administrative change because it provides a clarification of the actions required to be taken when a sequencer is inoperable. An inoperable sequencer is equivalent to both an offsite and diesel generator being inoperable, which is addressed by CTS 3.8.1.1 Action b.	3.8.1 Action F	3.8.1.1 Action b
3.8 A.10	The CTS action requirements were revised by the addition of a specific ITS Action to enter LCO 3.0.3 when three AC sources are inoperable. As the CTS did not contain an Action for three inoperable sources, corresponding CTS 3.0.3 entry was implicitly required for this condition. Making this requirement explicit is an administrative change.	3.8.1 Action H	3.8.1.1 Actions 3.0.3

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.8 ELECTRICAL POWER SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.8 A.11	Three ITS SR Notes were added to the CTS SR. The Notes maintain the technical requirements of the CTS and only represent a change in presentation and format to conform with the ITS style.	SR 3.8.1.2	4.8.1.1.2.a.4
3.8 A.12	The CTS SR clarification for an engine prelube prior to a DG start was reformatted into an ITS note used in each applicable ITS SR consistent with manufacturer recommendations.	3.8.1 SRs involving diesel generator starts	4.8.1.1.2.a.4
3.8 A.13	The information contained in the CTS SR footnote was reformatted into two ITS style notes and applied to the corresponding ITS SR. The ITS SR Notes represent a change in presentation to conform to the STS and maintain the technical requirements of the CTS. Therefore, this change is administrative.	SR 3.8.1.3	4.8.1.1.2.a.5 footnote
3.8 A.14	The CTS requirement to perform certain SRs "during shutdown" (Modes 5 and 6) has been reformatted into an ITS note which prohibits testing with the reactor at power (Modes 1-4). The ITS language is equivalent, thus this change is administrative.	(C) SRs 3.8.1.11, 3.8.1.13, 3.8.1.14, 3.8.1.16, 3.8.1.17, 3.8.1.19 and 3.8.4.8	(C) 4.8.1.1.2.g.4, 6, 7, 9, 10 and 4.8.1.1.4 d
		(M)SR 3.8.1.11, 3.8.1.16, 3.8.1.17, and 3.8.1.19	(M) 4.8.1.1.2.e.4, 6, 10, and 11
3.8 A.15	The CTS surveillance requirements for DG operation were revised to include an ITS note which indicates that momentary transients outside the load and power factor ranges do not invalidate the test. This change is considered a clarification of the existing requirements since it is not considered to alter the overall technical requirement to operate the DG loaded for the specified period. Therefore, this change is administrative.	(C) SR 3.8.1.14 and 3.8.1.15 (M) SR 3.8.1.14	(C) 4.8.1.1.2.g.7 and 4.8.1.1.2.g.15 (M) 4.8.1.1.2.e.8 footnote
3.8 A.16	Not used.		

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.8 ELECTRICAL POWER SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.8 A.17 (C)	A Note was added to the CTS surveillances to explicitly permit a prelube of the DG turbo charger prior to the required DG start. Prelubes have always been conducted on the DG prior to these starts and the addition of the Note is considered an administrative clarification since the CTS did not preclude the performance of a prelube.	SRs 3.8.1.11, 3.8.1.12, 3.8.1.15, 3.8.1.19, and 3.8.1.20	4.8.1.1.2.g.4, 4.8.1.1.2.g.5, 4.8.1.1.2.g.6, 4.8.1.1.2.g.15, and 4.8.1.1.2.h
3.8 A.18 (M)	A Note was added to CTS SRs to require that testing not be performed during Modes 1 and 2. The addition of the Note is consistent with the phrase "during shutdown" used in the CTS requirements.	SR 3.8.1.8, 3.8.1.9, 3.8.1.10, and 3.8.1.14	4.8.1.1.1 b and 4.8.1.1.2.e requirements 2, 3, and 8
3.8 A.19	Not used.		
3.8 A.20	Not used.		
3.8 A.21	Not used.		
3.8 A.22	The CTS shutdown LCO requirements for the DG required operable (minimum fuel oil in the day and the fuel storage tank and the fuel transfer valve) are redundant to requirements contained in the operating LCO (CTS 3.8.1.1) and were deleted. The ITS shutdown LCO requirements simply refer to the operating LCO for all DG operability requirements.	LCO 3.8.2 SR 3.8.2.1	3.8.1.2
3.8 A.23	Not used.		
3.8 A.24	A clarifying Note was added to the CTS to require the entry of applicable Conditions and Required Actions of ITS LCO 3.8.10, "Distribution Systems - Shutdown" if a train becomes de-energized with the loss of an offsite circuit. The Note reflects the current requirement that would require the entering of LCOs that are applicable and thus provides no additional technical requirements.	3.8.2	3.8.1.2 Actions

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.8 ELECTRICAL POWER SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.8 A.25 (M)	The CTS action requirement that the RCS must be depressurized and vented within 8 hours through a 4.5 square inch vent was revised to require a vent size of 2.75 square inches. This change corrects an error in the CTS. As a part of a license amendment dated March 29, 1995 and approved by the NRC as Amendment 162/144 on January 11, 1996, the correct RCS vent size for overpressure protection is 2.75 square inches. This requirement with the correct vent size is also reformatted to conform with the STS.	3.8.10 Required Action A.2.6	3.8.1.2 Action
3.8 A.26	The CTS requirement for the Fuel Storage System was used as the basis for new separate specification, ITS3.8.3, "Diesel Fuel Oil, Lube Oil and Starting Air". Currently, the fuel oil and the starting air subsystems are evaluated for DG OPERABILITY, but are not explicitly specified in the CTS AC sources LCO. The addition of the new requirements for these subsystems maintains the current interpretations for required DG subsystems. Thus, this change is administrative.	3.8.3	3.8.1.1 b. 2)
3.8 A.27	A Note was added to the DG support system requirements to allow separate Action Condition entry for each DG. The addition of the ITS Note does not modify current requirements and is therefore an administrative change.	3.8.3 Actions	3.8.1.1 Actions
3.8 A.28	An Action was added to the CTS DG support system requirements that requires the DG to be immediately declared inoperable if Required Actions and associated Completion Times of the support system Actions Conditions are not met. The addition of the ITS Action does not modify any technical requirement and is therefore an administrative change.	3.8.3 Action F (C) 3.8.3 Action E (M)	3.8.1.1
3.8 A.29	The CTS requirements for sampling of new and stored DG fuel oil have been moved to Section 5.0, Administrative Controls. The corresponding ITS SR refers to the requirements in Section 5.5.13 but does not modify any technical requirement.	SR 3.8.3.3 (C) SR 3.8.3.2 (M) 5.5.13	(C) 4.8.1.1.2.e and 4.8.1.1.2.f. (M) 4.8.1.1.2.c and 4.8.1.1.2.d.
3.8 A.30	Not used.		
3.8 A.31 (C)	The CTS battery requirements were combined with the CTS diesel generator's battery and charger requirements and reformatted into the ITS LCO for the DC sources required for Modes 1 through 4. This change in presentation is administrative.	3.8.4	3/4.8.2.1 3/4.8.1.1

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.8 ELECTRICAL POWER SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.8 A.32	Not used.		
3.8 A.33	The CTS battery and charger requirements for Modes 5 and 6 are reformatted into the ITS specification for the DC sources during shutdown. The CTS LCO statement was clarified to indicate that whenever a second DC vital bus distribution system is required operable by ITS LCO 3.8.10, the distribution system need only be energized (battery or charger) consistent with current requirements and the definition of operability.	LCO 3.8.5	3.8.2.2 3.8.1.2.b.4 (C)
3.8 A.34	Not used.		
3.8 A.35	Not used.		
3.8 A.36	A new specification, "Battery Cell Parameters" was created using the CTS requirements contained in the DC Sources specification. The Actions of the new specification are modified by a Note which allows separate Condition entry for each battery. This change is administrative because the technical requirements of the CTS are maintained and only format changes are made.	3.8.6	3/4.8.2.1
3.8 A.37	The CTS battery cell parameter table notations were reformatted and used as Actions in the new ITS Battery Cell Parameter specification.	3.8.6 Actions A.1 and A.2	Table 4.8-3 Notations (1) and (2)
3.8 A.38 (C)	The CTS surveillance requirements for the DG batteries were reformatted consistent with the STS and presented as an Action in the new ITS specification for Battery Cell Parameters.	3.8.6 Action C	4.8.1.1.4 a. and b
3.8 A.39 (C)	The CTS surveillance requirements for the DG and Class 1E batteries are combined and reformatted consistent with the corresponding ITS surveillance requirement.	SR 3.8.6.4	4.8.1.1.4.b.2 and 4.8.2.1.1.b.3
3.8 A.40	The CTS battery cell parameter table notes are reformatted and moved to the corresponding ITS table note(s).	Table 3.8.6-1 notes: (C) (b) (M) (b) and (c)	Table 4.8-3 notes: (C) (4) and (5) (M) (5) and (6)

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.8 ELECTRICAL POWER SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.8 A.41	A Note was added to the CTS Actions to explicitly requires the entry of applicable Conditions and Required Actions of ITS LCO, "Distribution Systems - Operating" if a train becomes de-energized with the loss of an inverter. The Note reflects the current requirements to enter the action requirements of applicable LCOs and thus does not represent a technical change. Therefore, this is an administrative change.	3.8.7 Action A Note	3.8.3.1 Actions
3.8 A.42	Not used.		
3.8 A.43 (C)	The CTS action requirements were revised by the addition of an ITS Action that requires any affected feature made inoperable with the loss of the required inverter to be declared inoperable or ITS 3.8.8 Action A.2 to be entered. This new Action maintains the current interpretation of the CTS inverter requirements.	3.8.8 Action A.1	3.8.3.2 Actions
3.8 A.44 (C)	The CTS inverter surveillance requirement that the inverter maintain voltage and proper breaker alignment be verified every 7 days, was revised to require the correct inverter voltage and alignment to the required AC vital bus be verified every 7 days. This change in presentation maintains the intent of the current requirements. Thus this is an administrative change.	SR 3.8.8.1	4.8.3.2
3.8 A.45	Not used.		
3.8 A.46 (C)	The CTS action requirements were revised by the addition of the ITS Action that requires entry into applicable Condition(s) and Required Action(s) of ITS LCO 3.8.1, if a DG DC subsystem becomes inoperable. This addition is consistent with the definition of Operability for a DG and therefore only provides a clarification to the CTS.	3.8.4 Action C	3.8.2.1 Actions

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.8 ELECTRICAL POWER SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.8 A.47 (C)	In the event either battery EBA or EBD inoperable, CTS 3/4.8.2.1 Action d allows 10 days to restore the battery to operable status provided the associated DG (DGBA or DGBB) DC subsystem powers the associated DC train subsystem (EDE or EDF bus). This action requirement was reformatted, consistent with the STS as ITS 3.8.4 Action A. It maintains the requirement to supply DC power from either the DC channel or the DG DC subsystem. In the event the DG DC subsystem is also inoperable, ITS 3.8.4 Action D requires immediately entering the applicable Condition(s) and Required Action(s) of ITS LCO 3.8.9, "Distribution Systems-Operating". ITS 3.8.9 Action D would allow 2 hours to restore the DG DC subsystem. This is the same time allowed by CTS 3/4.8.2.1 Action a, for an inoperable DG DC subsystem. Therefore, the ITS action requirements represent an administrative reformatting of the CTS action rerquirements.	3.8.4 Action A 3.8.4 Action D	3.8.2.1 Action d 3.8.2.1 Action a
3.8 A.48	The CTS SRs have been combined and reformatted to form a single ITS SR. The ITS SR maintains the technical requirements of the CTS.	SR 3.8.9.1	(C) SR 4.8.2.1.2 and 4.8.3.1 (M) 4.8.2.1.1 and 4.8.3.1
3.8 A.49	Portions of two CTS specifications were reformatted and used in the new ITS specification for "Distribution Systems - Operating". No technical changes were made to the CTS requirements.	3.8.9	3/4.8.3.1 3/4.8.2.1
3.8 A.50	The CTS specification is reformatted into the ITS specification for Distribution Systems during shutdown. The technical requirements of the CTS are maintained.	3.8.10	3/4.8.3.2
3.8 A.51	Not used.		
3.8 A.52	Two CTS SRs are combined and reformatted to form a single ITS SR. The technical requirements of the CTS are maintained.	SR 3.8.10.1	4.8.2.2.1 and 4.8.3.2

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.8 ELECTRICAL POWER SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.8 A.53 (C)	The CTS actions requirements in the event one or more required electrical distribution subsystems are inoperable were revised by the addition of new ITS action requirements. ITS 3.8.10 Required Action A.1 requires immediately declaring inoperable associated supported features. The CTS definition of OPERABILITY requires the normal or emergency power source; therefore, if the bus were deenergized, the supported equipment would be considered inoperable. The addition of ITS 3.0.6 would not specifically require the actions of supported equipment be taken; therefore this action maintained this option. Alternatively, the operators may follow ITS 3.8.10 Required Action A.2. Required Actions A.2.1 through A.2.4 specifically retain the remedial measures specified in CTS 3/4.8.3.2 Actions. Finally, Required Action A.2.6 requires immediately declaring affected LTOP features inoperable. See DOC 3.8 - A.60 to see why this is consistent with the CTS action requirements. The changes contained in ITS 3.8.10 Action A are administrative because the new action requirements are consistent with the current interpretation of the CTS and represent no technical changes in the restrictions of the CTS.	3.8.10 Required Action A.1 3.8.10 Required Actions A.2.1 - A.2.4 3.8.10 Required Action A.2.6	3.8.3.2 Actions
3.8 A.54 (M)	The CTS note which allows, during period of station modifications, a one-time exception for up to 112 hours for CTS 3.8.3.1 and 30 days for CTS 3.8.2.1, for batteries replacement was deleted. The applicable modifications are completed; thus the exception provided by the note is no longer required.	3.8.4, 3.8.7	3.8.3.1 and 3.8.2.1
3.8 A.55 (C)	Two CTS Actions for an inoperable DC source were reformatted and combined into one ITS Action. The technical requirements of the CTS are maintained.	3.8.4 Action A	3.8.2.1 Actions c and b
3.8 A.56 (M)	The portion of the CTS table for High Specific Gravity cells was deleted. This type of cell was replaced and that part of the CTS Table is no longer applicable to the plant design.	Table 3.8.6-1	Table 4.8-3

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.8 ELECTRICAL POWER SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.8 A.57 (M)	The CTS LCO note which provides conditions when an inverter may be disconnected from its DC source for up to 72 hours, if CTS 3.8.2.1 Action b is satisfied, was deleted. The CTS note is redundant to the Actions contained in the corresponding ITS specification.	3.8.4 Required Action A.2	3.8.3.1 Note
3.8 A.58 (M)	The CTS Action which allows continued operation with an inoperable dc source for 72 hours provided the associated bus tie breakers are closed within 2 hours was reformatted consistent with the corresponding ITS Action but maintains the technical content of the CTS.	3.8.4 Action A	3.8.2.1 Action b.2
3.8 A.59	Not used.		
3.8 A.60 (C)	The CTS Action requirements for the condition of less than the minimum required sources Operable that require the RCS to be depressurized and vented within 8 hours through a 4.5 square inch vent was retained and reformatted consistent with the ITS. Specifically, ITS 3.8.10 Required Action A.2.6 requires immediately declaring affected LTOP features inoperable. ITS 3.4.12 for LTOP contains the above CTS action requirement. Thus this change maintains the technical requirements of the CTS, and is administrative.	3.8.10 Action A.2.6 3.4.12 Actions	3.8.1.2, 3.8.2.2, and 3.8.3.2 Actions
3.8 A.61	Not used.		
3.8 A.62	Not used.		
3.8 A.63	Not used.		
3.8 A.64	Not used.		
3.8 A.65	Not used.		
3.8 A.66 (M)	The CTS footnote which states, "Required for both Units 1 and 2" and the CTS action which also states that it applies to both units are clarifications that were deleted. The deleted clarifications were applicable to shared systems. LCO 3.0.8 and SR 3.0.5 state that LCOs and SRs apply to each unit individually, therefore, the footnote is redundant and unnecessary.	3.8.10	3.8.3.2.c footnote *

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.8 ELECTRICAL POWER SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.8 A.67	The CTS Actions were clarified to require ITS LCO 3.0.3 to be entered immediately if two or more of the required buses or channels are inoperable and a loss of safety function exists, consistent with the rules of usage of the ITS. This is an administrative change because in this condition the CTS would require a unit shutdown consistent with CTS 3.0.3.	3.8.9	3.8.3.1 and 3.8.2.1 3.0.3
3.8 A.68	The CTS inverter requirements for Modes 5 and 6 are reformatted into the ITS specification for the inverters during shutdown. The CTS LCO statement was clarified to indicate that whenever a second AC vital bus distribution system is required operable by ITS LCO 3.8.10, the distribution system need only be energized (inverter or regulated voltage transformer) consistent with current requirements and the definition of operability.	3.8.8 LCO 3.8.8	3.8.3.2

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.9 REFUELING OPERATIONS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.9 A.1	The CTS has been reformatted and renumbered in accordance with NUREG-1431. As a result, the Technical Specifications are more readily readable, and therefore understandable, by plant operators as well as other users. The reformatting, renumbering, and rewording process serves only to clarify the CTS requirements and involves no technical changes to the CTS.	3.9	3.9
3.9 A.2	Not Used.		
3.9 A.3 (C)	The CTS Action reporting requirement is moved into ITS section 5.6.6 and only referenced in the corresponding ITS Action.	3.9.3 Action B	3.9.4, Action b
3.9 A.4	The CTS Ventilation Filter Testing requirements are moved to the Administrative Controls section of the ITS.	5.5.11, Ventilation Filter Testing Program	(M) 4.9.4.2 and (C) 4.9.4.2.b - 4.9.4.2.f
3.9 A.5	The CTS Action "to suspend all operations involving an increase in the reactor decay heat load" was replaced with the phrase, "suspend loading irradiated fuel assemblies in the core". Irradiated fuel assemblies are the only significant source of decay heat.	(C) 3.9.4, Action A and (M) 3.9.5, Action A	3.9.8.1 Action
3.9 A.6	The CTS LCO 3.9.8.2 Note that allows the RHR loop to be removed from operation for up to 1 hour per 8 hour period during the performance of Core Alterations is being deleted. This allowance was for initial criticality and is no longer valid.	NA	3.9.8.2 Note
3.9 A.7	An exception was added to the CTS Applicability which allows level in the cavity to be less than 23 feet while latching and unlatching control rod drive shafts. The exception was necessary due to the definition of Core Alterations being included in the applicability of this LCO. Core Alterations includes the unlatching and latching of control rod drive shafts and would have prevented this operation without the new exception.	(C) 3.9.6, (M) 3.9.7	3.9.9
3.9 A.8 (C)	The CTS utilizes a trip signal during testing. The corresponding ITS surveillance clarifies that an actual, as well as a simulated signal, may be used to meet the Surveillance Requirement.	SR 3.9.2.3	4.9.2.1.1.d (1) and (2)
3.9 A.9 (C)	Deletion of redundant CTS surveillance requirement.	SR 3.9.2.5	CTS 4.9.2.1.2.b

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 3.9 REFUELING OPERATIONS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.9 A.10 (C)	The term ANALOG CHANNEL OPERATIONAL TEST (ACOT) has been revised in the CTS surveillances to a Channel Operational Test (COT).	SR 3.9.2.2 and SR 3.9.2.5	4.9.2.1.1.c and 4.9.2.1.2.c
3.9 A.11	The CTS applicability footnote* was deleted because it was redundant to the definition of MODE 6 contained in CTS Table 1.2. The definition was retained in ITS Section 1.0 and ITS Table 1.1-1.	3.9.1	3.9.1

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 4.0 DESIGN FEATURES

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
4.0 A.1	The CTS has been reformatted and renumbered in accordance with NUREG-1431. As a result, the Technical Specifications are more readily readable, and therefore understandable, by plant operators as well as other users. The reformatting, renumbering, and rewording process serves only to clarify the CTS requirements and involves no technical changes to the CTS.	4.0	5.0
4.0 A.2	A text description of the site location has been added to the CTS. This addition does not add a new requirement, or delete or modify any existing requirement. The change affects only the presentation of the information.	4.1	5.1
4.0 A.3 (C)	The requirement for reload fuel assemblies to have a nominal maximum 5% by weight enrichment of U-235 is moved from CTS 5.3.1 into the requirements for the spent and new fuel storage areas in the ITS. This change retains the requirement for a nominal maximum of 5% enriched U-235 fuel assemblies.	4.3.1.1.a and 4.3.1.2.a	5.3.1
4.0 A.4	The CTS requirements for component cyclic limits have been moved to the ITS Administrative Controls section and renamed the "Component Cyclic and Transient Limit Program".	5.7	5.5.6

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 5.0 ADMINISTRATIVE CONTROLS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
5.0 A.1	The CTS has been reformatted and renumbered in accordance with NUREG-1431. As a result, the Technical Specifications are more readily readable, and therefore understandable, by plant operators as well as other users. The reformatting, renumbering, and rewording process serves only to clarify the CTS requirements and involves no technical changes to the CTS.	5.0	6.0
5.0 A.2	The CTS requirement that the Shift Supervisor (or during his absence from the control room a designated individual) be responsible for the control room command function and the CTS requirements applicable during the absence of the Shift Supervisor from the control room in MODES 1, 2, 3, or 4 and MODES 5 or 6 were combined into one ITS requirement which includes the CTS allowance to permit the Shift Work Manager to assume the control room command function.	5.1.2	6.1.2, Table 6.2-1
5.0 A.3	Not used.		
5.0 A.4	The requirements in CTS for the Shift Manager have been moved to the same location as the requirements for the unit staff. Additional information has been added describing the nature of the advisory support to be provided to the shift supervisor and to identify that the position must meet the qualifications for the Shift Technical Advisor position as outlined in the Commission's Policy Statement on Engineering Expertise on Shift.	5.2.2	6.2.4, 6.2.2
5.0 A.5	The CTS Inservice Inspection and Testing Program requirements were moved to the Administrative Controls section of the ITS.	5.5.8	4.0.5
5.0 A.6	A new cross reference between ASME and TS frequencies was added to the CTS. The new terminology added is "Biennially or every 2 years" and the new frequency added is "at least once per 731 days." This change is administrative because it does not add any new TS requirements or modify existing ones.	5.5.8.a	4.0.5.b
5.0 A.7	Not used.		
5.0 A.8	Not used.		

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 5.0 ADMINISTRATIVE CONTROLS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
5.0 A.9	The CTS requirements for component cyclic limits were moved to the ITS Administrative Controls.	5.5.6	5.7
5.0 A.10	Not used.		
5.0 A.11	The CTS reactor coolant pump flywheel surveillance requirements were moved to the ITS Administrative Controls as the "Reactor Coolant Pump Flywheel Inspection Program."	5.5.7	4.4.10
5.0 A.12	The annual report submittal date in the CTS as a separate requirement is omitted from the ITS because the individual reports described in the CTS and retained as ITS have been modified to include the required submittal dates. The submittal date for the Occupational Radiation Exposure Report is revised from March 1 to April 30. This change in submittal date is administrative because it does not change any CTS restrictions on plant operation.	5.6.1 through 5.6.7, except 5.6.4 5.6.1	6.9.1.4 6.9.1.a
5.0 A.13	The CTS Surveillance Requirements for inspecting the Steam Generator Tubes were moved to the ITS Administrative Controls section as the "Steam Generator Tube Surveillance Program."	5.5.9	4.4.5.1 through 4.4.5.5
5.0 A.14	The CTS Surveillance Requirements for the following ventilation systems were moved to the Administrative Controls section as the, "Ventilation Filter Testing Program (VFTP)." Annulus Ventilation System; Control Room Area Ventilation System; Auxiliary Building Filtered Exhaust System; Reactor Building Containment Purge System; and Fuel Handling Ventilation Exhaust System	5.5.11	McGuire - 4.6.1.8.b.1, b.2, c, d.1, d.5; 4.7.6.c.1, c.2, d, e.1, e.4; 4.7.7.1.a.1, a.2, b, c; 4.9.4.2.a.1, a.2, b, c; and 4.9.11.2.a.1, a.2, b, c.1

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 5.0 ADMINISTRATIVE CONTROLS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
			Catawba - 4.6.1.8.b.1, b.2, c, d.1, d.5, e, f; 4.7.6.c.1, c.2, d, e.1, e.4, f; 4.7.7.b.1, b.2, c, d.1, d.5, e, f; 4.9.4.2.b.1, b.2, c, d.1, d.2, e, f; and 4.9.11.2.b.1, b.2, c, d.1, d.4, e, f
5.0 A.15	The CTS requirement for the Annual Radioactive Effluent Release Report to be submitted before May 1 each year was revised to be in accordance with 10 CFR 50.36a. 10 CFR 50.36a requires the report be submitted no more than 12 months after the previous submittal. This change in presentation of the required reporting date is administrative because the reporting date has not changed.	5.6.3	6.9.1.7
5.0 A.16	The CTS Surveillance Requirements that specify a temperature of 30°C when testing for methyl iodide penetration are revised to require the temperature to be ≤ 30°C. These changes are administrative because they are consistent with the ASTM testing requirements which are already being implemented, and because they are consistent with current test practice and the intent of the CTS.	5.5.11	Catawba - 4.6.1.8.b.2, 4.6.1.8.c, 4.7.6.c.2, 4.7.6.d, 4.7.7.b.2, 4.7.7.c, 4.9.4.2.b.2, 4.9.4.2.c, 4.9.11.2.b.2, and 4.9.11.2.c
			McGuire - 4.7.7.1.a.2 and 4.7.7.1.b
5.0 A.17	The CTS requirements for liquid effluents, gaseous effluents and explosive gas mixtures were moved to the ITS Administrative Controls section.	5.5.12	Catawba - 3.11.1.1, 3.11.2.1, and 3.11.2.2
			McGuire - 3.11.1.4, 3.11.2.5, and 3.11.2.6

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 5.0 ADMINISTRATIVE CONTROLS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
5.0 A.18	The CTS requirement for the Annual Radiological Environmental Operating Report to be submitted each year prior to May 1 was revised to require the report to be submitted prior to May 15. This change in submittal date is administrative because it does not change any CTS restrictions on plant operation.	5.6.2	6.9.1.6
5.0 A.19	The references to CTS specifications which have been relocated from the TS have been deleted from the list of specifications supported by the COLR.	5.6.5	6.9.1.9
5.0 A.20	The CTS requirements for a Ventilation Systems Heater Report to be submitted within 30 days for failures of the ventilation heaters which are not restored within the allowed completion time were moved to the ITS Administrative Controls section.	5.6.6	Catawba - 3.6.1.8, 3.7.6, 3.7.7, 3.9.4, and 3.9.11 McGuire - 3.6.1.8 and 3.7.6
5.0 A.21	A requirement for a Post Accident Monitoring Report was added to the Administrative Controls section. This report is required by ITS 3.3.3, "Post Accident Monitoring (PAM) Instrumentation," and is required to be submitted within 14 days. The ITS report replaces the generic 6.9.2 Special report required by CTS 3/4.3.3.6 action requirements. This change is administrative because the time allowed to make the report has not changed.	5.6.7	6.9.2 3/4.3.3.6 Actions
5.0 A.22	Not used.		
5.0 A.23	The CTS reports required for the steam generator tube inspection surveillances were moved to the Administrative Controls section in the ITS.	5.6.8	4.4.5.5
5.0 A.24	Additional requirements have been added to the CTS to describe the controls for the UFSAR Section which contains the Radiological Effluent Technical Specifications. These specifications were relocated under an earlier amendment prior to guidance for implementing Generic Letter 89-01.	5.5.5	6.8.4.f

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 5.0 ADMINISTRATIVE CONTROLS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
5.0 A.25	The CTS requirements for high radiation areas with locked doors has been revised to permit the areas to be continuously guarded. This meets the same intent as the current requirements since entry into the area could not be obtained without permission of the guard or from the key holder. Thus this is an administrative change.	5.7.2 and 5.7.3	6.12.1
5.0 A.26	The ITS specification for Shutdown Margin (ITS 3.1.1) was added to the list of parameters controlled by the COLR.	5.6.5.a.11	6.9.1.9
5.0 A.27	The CTS has been revised to delete unnecessary parenthetical detail from the list of specifications and supporting topical reports used in the COLR. The individual specifications clearly identify which parameters are found in the COLR.	5.6.5	6.9.1.9
5.0 A.28	The CTS definition of tube inspection has been revised to clarify that the inspection encompasses the entire tube from entry to exit and is not dependent on where the inspection starts, i.e. it may start on either the hot or cold leg side.	5.5.9.4.a.8.	4.4.5.4.a.8
5.0 A.29	The CTS has been revised to change the point of measurement for the radiation field from 45 cm (18 in.) to 30 cm (12 in.), to conform to 10 CFR 20.1601. It is an administrative change because the measurement point only provides a consistent reference to baseline field strength and has no affect on how the plant is operated.	5.7.1 and 5.7.2	6.12.1 and 6.12.2
5.0 A.30	CTS 6.9.2 for special reports is omitted from the ITS because ITS action requirements specifiying the generation of special reports reference the appropriate specific ITS Administrative Control specifications; e.g., PAM report (ITS 5.6.7).	5.6	6.9.2
5.0 A.31	The CTS program section of Administrative Controls has been revised to include the Containment Leakage Rate Testing Program. The ITS program maintains the acceptance criteria previously specified in CTS 3.6.1.2.	5.5.2	6.8 3.6.1.2
5.0 A.32	The responsibility for maintaining keys for high radiation areas in the CTS has been changed from radiation protection supervision to radiation protection personnel. This is an administrative change because it only clarifies the intent of the CTS wording.	5.7.2	6.12.2

(C) Catawba specific
(M) McGuire specific

TABLE A - ADMINISTRATIVE CHANGES
SECTION 5.0 ADMINISTRATIVE CONTROLS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
5.0 A.33	The equipment requirements for estimating dose assignments in the CTS have been revised to include electronic dosimeters. This is an administrative change because these devices are currently in use and are considered within the current interpretations of what constitutes pocket dosimeters.	5.6.1	6.9.1.5
5.0 A.34	The CTS requirements for testing new and stored fuel oil in accordance with ASTM Standards are moved to the ITS Administrative Controls section as the, "Diesel Fuel Oil Testing Program."	5.5.13	4.8.1.1.2.c and 4.8.1.1.2.e
5.0 A.35	The CTS requirements to maintain procedures for the Plant Fire Protection Program is omitted from the TS because they are redundant to another specification. This requirement is specifically identified in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, in Section 1, as Item 1 which is addressed by ITS 5.4.1.a. Therefore, this change is administrative.	5.4.1.a	6.8.1.i and 6.8.1.a
5.0 A.36	The CTS surveillance requirements for the SG Tube Inspection frequencies and the testing of the Diesel Fuel Oil were moved to ITS Section 5.5 as administrative programs. A statement is added to each of these requirements in the ITS. A phrase was added to the frequencies of the SG Tube Surveillance Program to state that the provisions of SR 3.0.2 are applicable. A statement was also added to the DG Fuel Oil Testing Program to state that the provisions of SR 3.0.2 and SR 3.0.3 are applicable. The addition of these statements to the ITS programs provides consistency with the general requirements applicable to these programs when they were surveillance requirements in the CTS.	5.5.9.3 and 5.5.13	4.4.5.3, 4.8.1.1.2.f (C), and 4.8.1.1.2.d (M)
5.0 A.37	The CTS requirement that the Offsite Dose Calculation Manual be approved by the NRC prior to implementation is deleted. The CTS (C) requirement that the FSAR Section 16.11 radiological effluent controls be approved by the NRC prior to implementation is also deleted. These requirements were applicable to the initial approval of these documents. After the initial approval, changes to these requirements are controlled by the licensee in accordance with CTS 6.14.2 and 6.16.2 (C) and no longer require NRC approval. Deletion of a statement of an expired requirement is an administrative change.	5.5.1	6.14.1, 6.16.1(C)

(C) Catawba specific
(M) McGuire specific

TABLE M - MORE RESTRICTIVE CHANGES
SECTION 1.0 USE AND APPLICATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
	No "More Restrictive Changes" were made in this section.		

(C) Catawba specific
(M) McGuire specific

TABLE M - MORE RESTRICTIVE CHANGES
SECTION 2.0 SAFETY LIMITS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
2.0 M.1	An action to restore compliance with the Safety Limit was added to the CTS. The new requirement explicitly specifies restoration of the reactor core safety limit in addition to the CTS requirement for a unit shutdown within 1 hour.	2.2.1	2.1.1

(C) Catawba specific
(M) McGuire specific

TABLE M - MORE RESTRICTIVE CHANGES
SECTION 3.0 LCO AND SR APPLICABILITY

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.0 M.1	CTS 4.0.2 was revised to clarify that the 1.25 times the interval specified in the Frequency does not apply to frequencies specified as "once". The interval extension concept is based on scheduling flexibility for repetitive performances; however, these Surveillance Requirements are not repetitive in nature. The ITS precludes the ability to extend these performances, which is an additional restriction beyond that specified in the CTS.	SR 3.0.2	4.0.2
3.0 M.2	CTS allowance for a 24 hour delay from entering the Actions (after it is discovered a Surveillance is missed) to permit the completion of the Surveillance if the allowed outage time of the ACTION is less than 24 hours was revised consistent with the corresponding ITS requirement which only allows a time limit up to the specified Frequency or 24 hours, whichever is less, to complete the Surveillance.	SR 3.0.3	4.0.3
3.0 M.3	ITS LCO 3.0.6 was added to provide specific guidance regarding the appropriate ACTIONS to be taken when a single inoperability (a support system) also results in the inoperability of one or more related systems (supported system(s)). In addition, a new Program, Specification 5.5.15, "Safety Function Determination Program." was also added to work with LCO 3.0.6 to provide additional control on system operability. The addition of these new requirements are considered more restrictive.	LCO 3.0.6 and 5.5.15	3.0

(C) Catawba specific
(M) McGuire specific

TABLE M - MORE RESTRICTIVE CHANGES
SECTION 3.1 REACTIVITY CONTROL SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.1 M.1	Not used.		
3.1 M.2	The CTS action requirement for misaligned rods resulted in entry in CTS 3.0.3, and the plant was required to be placed in MODE 3 within 7 hours. This requirement was revised in the corresponding ITS Action and now requires the plant to be placed in MODE 3 within 6 hours if these action requirements are not met. The loss of 1 hour in the Completion Time is a more restrictive change.	3.1.4 Action C	3.1.3.1 Action b and 3.0.3
3.1 M.3	The CTS action permited continued operation for 72 hours with one or more trippable rods not within alignment limits provided the remaining rods within the banks were aligned with the inoperable rods, while maintaining rod sequence and insertion limits. This is revised to require that SDM [shutdown margin] be verified or boration initiated to restore SDM within 1 hour and to require placing the plant in MODE 3 within 6 hours.	3.1.4 Action D	3.1.3.1 Action d
3.1 M.4	If the action requirements of the CTS were not met, a shutdown to MODE 3 in accordance with CTS 3.0.3 was required in 7 hours. The corresponding ITS action requirements require placing the plant in MODE 3 within 6 hours if these action requirements are not met. The loss of 1 hour in the Completion Time is a more restrictive change.	3.1.7 Action D	3.1.3.2 Actions and 3.0.3

(C) Catawba specific
(M) McGuire specific

TABLE M - MORE RESTRICTIVE CHANGES
SECTION 3.2 POWER DISTRIBUTION LIMITS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.2 M.1	If the CTS Actions are not be completed within the required time, entry into CTS 3.0.3 would be required and a shutdown to MODE 2 in 7 hours would become applicable. This CTS requirement was revised consistent with the corresponding STS specification which provides a specific Action for the condition of not completing Actions which requires placing the unit in MODE 2 in 6 hours (1 hour less than the CTS).	3.2.1 Action D	3.2.2 Actions and 3.0.3
3.2 M.2	The CTS Surveillance Requirements which specify verification of hot channel factors after reaching equilibrium conditions following power changes greater than 10% from when these factors were last determined were revised to require this verification within 12 hours after reaching equilibrium conditions.	SRs 3.2.1.1, 3.2.1.2, 3.2.1.3, 3.2.2.1, and 3.2.2.2	4.2.2.2.b.2, and 4.2.3.2.b.1
3.2 M.3	Not used.		
3.2 M.4	Not used.		
3.2 M.5	The QPTR limit of 1.09 in the CTS Action a has been deleted. The ITS base all Required Actions on QPTR in excess of 1.02, rather than providing additional action requirements for increasing values of QPTR.	3.2.4 Actions	3.2.4 Action a
3.2 M.6	Not used.		
3.2 M.7 (C)	The CTS exception to CTS 4.0.4 (which requires meeting all SRs before entering the Applicability of the associated LCO) in CTS 4.2.4.1.c has been replaced by a note in corresponding ITS SR 3.2.4.1; this note allows up to 12 hours to perform the surveillance after exceeding 50% RTP. This change is more restrictive because the CTS would allow up to 7 days to perform the SR.	SR 3.2.4.1	4.2.4.1.c
3.2 M.8	The CTS Surveillance Frequency of once per 12 hours has been revised to once within 12 hours and every 12 hours thereafter with the QPTR alarm inoperable. This change is more restrictive since the 25% Frequency extension of ITS SR 3.0.2 does not apply to "once within" frequencies whereas the corresponding 25% extension in CTS 4.0.2 would apply to all performances of this surveillance.	SR 3.2.4.1 SR 3.0.2	4.2.4.1.b 4.0.2

(C) Catawba specific
(M) McGuire specific

TABLE M - MORE RESTRICTIVE CHANGES
SECTION 3.3 INSTRUMENTATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.3 M.1	An Action is added to the CTS to require the unit to be in MODE 3 in 6 hours if the other required actions cannot be completed. The new Action removes the unit from the applicable MODE and is provided in lieu of entering LCO 3.0.3. The completion time of the new Action is one hour less than that provided by CTS LCO 3.0.3.	3.3.1	Table 3.3-1, Actions 2 and 6
3.3 M.2	The CTS requirement for the intermediate range monitors between P-6 and P-10 that specify the channel be restored to OPERABLE status prior to increasing power above 10% when one channel is inoperable was revised to include Actions for when two channels are inoperable to suspend positive reactivity additions and allow 2 hours to reduce power to below P-6. With two channels inoperable in the CTS, LCO 3.0.3 would be required to be entered and 7 hours would be allowed to place the unit in MODE 3.	3.3.1	Table 3.3-1, Action 3
3.3 M.3	The CTS Actions for Source Range Monitor channels were revised by the addition of the requirement for the RTBs to be opened immediately when two channels are inoperable. There are no specific CTS actions when two source range channels are inoperable, therefore, a CTS LCO 3.0.3 entry would be required. LCO 3.0.3 only requires the plant be in mode 3 in 7 hours.	3.3.1, Condition J	3.3.1
3.3 M.4	The CTS Action for the Pressurizer Pressure - Low (Interlock with P-7) , Pressurizer Water Level-High (Interlock with P-7), Reactor Coolant Flow--Low Two Loop (Above P-7 and Below P-8), Undervoltage--Reactor Coolant Pumps (Interlocked with P-7), Underfrequency Reactor Coolant Pumps (Interlocked with P-7) functions, requires an LCO 3.0.3 entry if the inoperable channel cannot be placed in trip in 6 hours. LCO 3.0.3 requires THERMAL POWER to be reduced to below P-7 within 7 hours. The time allowed for this Action was reduced by one hour consistent with the ITS Action.	3.3.1, Condition L	Table 3.3-1, Action 6.a
3.3 M.5	The CTS Action for the Reactor Coolant Flow--Low Single Loop (Above P-8), function, requires an LCO 3.0.3 entry if the inoperable channel cannot be placed in trip in 6 hours. LCC 3.0.3 would require THERMAL POWER to be reduced to < P-8 within 7 hours. The time allowed in this CTS Action to reduce THERMAL POWER < P-8 was reduced to three hours less in the corresponding ITS Action.	3.3.1, Condition M	Table 3.3-1, Action 6.a

(C) Catawba specific
(M) McGuire specific

TABLE M - MORE RESTRICTIVE CHANGES
SECTION 3.3 INSTRUMENTATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.3 M.6	The CTS Actions for Turbine Trip-Low Emergency Trip Fluid Pressure (Interlocked with P-9) and 11 for Turbine Trip-Turbine Stop Valve Closure requires an LCO 3.0.3 entry if an inoperable channel cannot be placed in trip in 6 hours. LCO 3.0.3 requires THERMAL POWER to be reduced to < P-9 within the following 7 hours. The time allowed by this CTS Action was reduced by three hours in the corresponding ITS Action.	3.3.1, Conditions O and P	Table 3.3-1, Action 6.a and 11
3.3 M.7	The CTS Action for Reactor Trip System Interlocks requires entry into LCO 3.0.3 if one channel is inoperable and the interlock cannot be verified in the required state for the existing unit conditions within 1 hour. This CTS Action was revised consistent with the ITS to require either the plant be placed in mode 2 or 3 in 6 hours, depending on the applicability of the interlock. This change is slightly more restrictive because it reduces the time limit to get outside the mode of applicability by one hour.	3.3.1	Table 3.3-1, Action 8
3.3 M.8	The CTS Actions that allow an RTB to be bypassed for maintenance on the undervoltage or shunt trip mechanisms were revised by the addition of a two hour RTB bypass time limit for maintenance on the undervoltage and shunt trip mechanisms.	(C) 3.3.1, Action Q (M) 3.3.1, Action R	Table 3.3-1, Action 12
3.3 M.9 (M)	The CTS Action requires shutdown margin to be verified within 1 hour and once per 12 hours thereafter when the only required source range neutron flux monitor becomes inoperable. This CTS Action was revised by the addition of requirements to suspend all operations which involve positive reactivity additions immediately and to close all unborated water source isolation valves within 1 hour.	3.3.1 Action L	Table 3.3-1, Action 5
3.3 M.10 (M)	The CTS RTS surveillance requirements were revised by the addition of a requirement to perform a channel operational test for the Reactor Trip System Interlocks.	SR 3.3.1.13	CTS Table 4.3-1
3.3 M.11	If the CTS ESFAS Action requirements are not met an LCO 3.0.3 entry is required. This CTS convention is revised by the addition of a specific ITS Action to require the unit to be in mode 3 within the following 6 hours and, if applicable, mode 4 within the following 12 hours if the Actions are not met. This change is slightly more restrictive, because with the CTS LCO 3.0.3 requirement, one additional hour is allowed prior to beginning the shutdown.	3.3.2	Table 3.3-3 Actions 15, 15a (C), 15b (M), 16, 19, and 20

(C) Catawba specific
(M) McGuire specific

TABLE M - MORE RESTRICTIVE CHANGES
SECTION 3.3 INSTRUMENTATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.3 M.12 (C)	The CTS Action for the main feedwater pumps trip requires the plant to shutdown to mode 3 with one channel inoperable. CTS Table 3.3-3 identifies this function as having 2 channels per pump. The actual design has 3 pressure switches per main feedwater pump in a 2/3 logic to indicate that the pump has tripped. The existing CTS Actions would permit both circuits to be inoperable before action was initiated. These CTS requirements were revised to require 3 channels per main feedwater pump to be operable and to require one inoperable channel to be placed in trip in 1 hour or the unit shutdown to mode 3.	3.3.2	Table 3.3-3, Action 25
3.3 M.13 (C)	The CTS Actions for RWST level-low require the inoperable channel to be placed in bypass and operation may continue. This CTS Action was revised to require the channel to be placed in bypass within 6 hours. In addition, when the CTS actions cannot be completed, an LCO 3.0.3 entry is required. This CTS convention is revised by the addition of a shutdown requirement if the Actions cannot be met within the required Completion Time. The new shutdown requirements are for the plant to be in mode 3 within the following 6 hours and mode 5 within the following 30 hours.	3.3.2	Table 3.3-3 Action 16a
3.3 M.14 (M)	The CTS Action is entered when one channel of the associated main feedwater pumps trip is inoperable and when the actions cannot be met, an LCO 3.0.3 entry is required. This CTS Actions convention was revised by the addition of a specific requirement for the unit to be in MODE 3 within the following 6 hours when the actions are not met. This change is slightly more restrictive, because with the CTS LCO 3.0.3 requirement, one additional hour is allowed prior to beginning the shutdown.	3.3.2	Table 3.3-3, Action 27 (M)
3.3 M.15 (C)	The CTS Action is entered when one channel of the associated ESFAS Function is inoperable and when the actions cannot be met, an LCO 3.0.3 entry is required. This CTS Actions convention was revised by the addition of a specific shutdown requirement if the actions cannot be met within the required Completion Time. The shutdown requirements are for the plant to be in mode 3 within the following 6 hours and mode 5 within the following 30 hours. This change is more restrictive, because with the CTS LCO 3.0.3 requirement, one additional hour is allowed prior to beginning the shutdown.	3.3.2	Table 3.3-3, Action 29

(C) Catawba specific
(M) McGuire specific

TABLE M - MORE RESTRICTIVE CHANGES
SECTION 3.3 INSTRUMENTATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.3 M.16	Not used.		
3.3 M.17 (M)	The CTS requirement for the plant to be in MODE 4 in 12 hours when the actions to restore an inoperable Remote Shutdown Function cannot be met was revised to require a power reduction to an intermediate step (MODE 3 within 6 hours).	3.3.4	3.3.3.5
3.3 M.18	Not used.		
3.3 M.19 (C)	The CTS requirements which specify no subsequent actions if the Actions cannot be met were revised by the addition of an Action to require the plant to be placed in mode 3 in 6 hours and mode 5 in 36 hours if the actions are not met. The CTS would require an LCO 3.0.3 entry in this case, which would require the plant to be in mode 5 in 37 hours. This change is slightly more restrictive since it allows one less hour to reach mode 5.	3.3.7	Table 3.3-3, Action 24 (C)
3.3 M.20	The CTS requirements which do not specify a time to place an inoperable containment pressure high-high in the bypassed condition were revised to require 6 hours to complete the action.	3.3.2	Table 3.3-3, Action 16
3.3 M.21	Not used.		
3.3 M.22 (M)	A new surveillance requirement is added to the CTS to verify that each required control circuit and transfer switch for the remote shutdown system is capable of performing the intended function.	SR 3.3.4.2.	3.3.3.5
3.3 M.23 (C)	The CTS requirements for accident monitoring instrumentation have been revised to include wide range neutron flux monitors and steam generator water level (wide range) indicators.	3.3.3	Tables 3.3-10 and 4.3-7
3.3 M.24 (M)	The CTS requirements for the Turbine Trip and Feedwater Isolation functions have been revised to include an initiation signal from Tavg-Low coincident with Reactor Trip (P-4).	3.3.2	Tables 3.3-3, 3.3-4, and 4.3-2

(C) Catawba specific
(M) McGuire specific

TABLE M - MORE RESTRICTIVE CHANGES
SECTION 3.3 INSTRUMENTATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.3 M.25 (C)	The CTS requirement that an inoperable Containment Pressure Control System channel be placed in trip in one hour was replaced with the ITS Action to require that the affected supported system be declared inoperable immediately.	3.3.2 Condition P	Table 3.3-3, Action 16b
3.3 M.26 (C)	The CTS power reduction requirement for an inoperable channel of ABFVES actuation instrumentation specifies that the plant be placed in Hot Shutdown (Mode 4). This requirement was revised to "be in Mode 5" in the corresponding ITS Action.	3.3.8, Action C	Table 3.3-3, Action 21a (C)
3.3 M.27 (C)	The CTS Total Number of Channels column for the Post Accident Monitoring Instrumentation was revised to increase the number of RCS Subcooling Margin Monitor channels required operable from 1 to 2 channels.	Table 3.3.3-1	Table 3.3-10
3.3 M.28	The CTS RTS Surveillance requirements were revised by the addition of a new surveillance requirement applicable to the P-7 Interlock Function. The new requirement for the P-7 interlock specifies an Actuation Logic Test.	SR 3.3.1.5	Table 4.3-1
3.3 M.29	The CTS RTS surveillance requirements were revised by the addition of a new Actuation Logic Test for Function 15, "Safety Injection Input from ESFAS".	Table 3.3.1-1	Table 4.3-1

(C) Catawba specific
(M) McGuire specific

TABLE M - MORE RESTRICTIVE CHANGES
SECTION 3.4 REACTOR COOLANT SYSTEM (RCS)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.4 M.1	The CTS requirement for performing the evaluation to determine if the RCS is acceptable for continued operation was revised by the addition of a 72 hour time limit for performing this evaluation.	3.4.3 Required Action A.2	3.4.9.1 Action
3.4 M.2	The CTS action required restoration of parameters to within limits within 30 minutes in the event the RCS Pressure and Temperature Limits were not met with the plant in other than MODE 1, 2, 3, or 4. In the ITS, this is revised to immediately require initiating action to restore the parameters to within limits. The revised requirement is more restrictive than 30 minutes; the ITS action requirement also explicitly states the CTS intent that the RCS be determined acceptable for continued operation before entering MODE 4.	3.4.3 Action C	3.4.9.1 Action
3.4 M.3	The CTS action requirement in the event no RCS loop is in operation in MODE 3 has been revised to also require that all Control Rod Drive Mechanisms be immediately de-energized, and to immediately initiate action to restore a loop to OPERABLE status as well as to operation.	3.4.5 Action D	3.4.1.2 Action c
3.4 M.4	The CTS action requirement which allows plant operation in MODE 3 for 72 hours with up to two RCS loops not in operation was revised to limit operation to 1 hour for the same condition, or to de-energize the control rod drive mechanisms (CRDMs) within 1 hour.	3.4.5 Action C	3.4.1.2 Action b
3.4 M.5	The CTS was revised by the addition of a new surveillance requirement to verify the reactor coolant pump (RCP) breaker position to the required pump that is not in operation.	SR 3.4.5.3	4.4.1.2
3.4 M.6	The CTS requirements specifying the amount of time all RCPs may be de-energized have been revised from ≤ 1 hour to ≤ 1 hour per 8-hour period as stated in Note (with provisions).	3.4.5, 3.4.6, and 3.4.7	3.4.1.2 and 3.4.1.3
3.4 M.7	The CTS action requirement for the condition of no RCS or RHR loop in operation was revised to include the condition when both required RCS or RHR loops are inoperable. This change will require that operations involving a reduction in boron concentration be suspended when any required loop is inoperable.	3.4.6 Action C	3.4.1.3 Action b

(C) Catawba specific
(M) McGuire specific

TABLE M - MORE RESTRICTIVE CHANGES
SECTION 3.4 REACTOR COOLANT SYSTEM (RCS)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.4 M.8	The CTS action requirements for no RHR loop in operation have been expanded to address the condition of two required RHR loops inoperable. In addition to requiring that the one loop be restored to operation, the actions also direct that one loop be restored to OPERABLE status.	3.4.7 Action B and 3.4.8 Action B	3.4.1.4.1 Action b and 3.4.1.4.2 Action b
3.4 M.9	A new SR was added to require a weekly verification that the correct breaker alignment exists and power is available to the required RHR pump which is not in operation.	SR 3.4.7.3 and SR 3.4.8.2	4.4.1.4.1 and 4.4.1.4.2
3.4 M.10	Additional restrictions on operations when no RHR pumps are in operation were added. The additional restrictions, contained in Note 1 to ITS LCO 3.4.8, require that no draining operations be performed which would further reduce RCS inventory when no RHR pumps are in operation and limits the time to 15 minutes when switching from one loop to another.	LCO 3.4.8 Note 1	3.4.1.4.2.b
3.4 M.11	The CTS is revised to include a restriction on the amount of time that the plant may be operated with more than one safety valve inoperable. The CTS action requirements do not include a specific condition for more than one valve inoperable; thus CTS 3.0.3 would apply and require placing the unit in MODE 3 within 7 hours. The ITS limits the time to reach Mode 3 to 6 hours, which is more resrtrictive.	3.4.10 Action B	3.4.2.2 Action and 3.0.3
3.4 M.12	The Applicability of the CTS for pressurizer safety valves was expanded to include MODE 4 with the temperature of all RCS cold legs > 300◦F(M) and > 285◦F (C).	3.4.10 Applicability	3/4.4.2.2 Applicability
3.4 M.13	The CTS exception to CTS 4.0.4 for entry into MODE 3 in CTS 4.4.6.2.1 is replaced with a note in ITS SR 3.4.13.1 to delay performance of RCS water inventory balance until after 12 hours of steady state operation in MODE 3 or 4 have occurred. This change is more restrictive on plant operation because the CTS does not contain a time limit of 12 hours of steady state operation within which to initially perform the surveillance.	SR 3.4.13.1Note	4.4.6.2.1 4.4.6.2.1.c
3.4 M.14	A note was added to the CTS Actions that indicates valves used to isolate a leaking RCS PIV must have been verified to meet the same leakage limit requirements. This is more restrictive since the CTS does not require such valves to be leak tested.	3.4.14 Action A Note	3.4.6.2 Action c
3.4 M.15	Not used.		

(C) Catawba specific
(M) McGuire specific

TABLE M - MORE RESTRICTIVE CHANGES
SECTION 3.4 REACTOR COOLANT SYSTEM (RCS)

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.4 M.16	Not used.		
3.4 M.17	The Frequency of the CTS SR to verify all but one charging pump is inoperable was changed from 31 days to 12 hours; the language of the CTS SR was also replaced with equivalent language. ITS SR 3.4.12.1 states "Verify a maximum of one charging pump or safety injection pump is capable of injecting into the RCS."	SR 3.4.12.1	4.1.2.3.2 and 4.1.2.4.2
3.4 M.18	CTS Action a allows up to 72 hours to restore one, two, or three inoperable coolant loops to Operable status. Corresponding ITS 3.4.5 Action A only allows the 72 hours for the condition of one or two required RCS loops inoperable. If three loops are inoperable, ITS 3.4.5 Required Action D.3 requires immediate action to restore one RCS loop to Operable status, which is more restrictive for a third concurrently inoperable RCS loop.	3.4.5 Action A and Required Action D.3	3.4.1.2 Action a and Action c
3.4 M.19	Not used.		
3.4 M.20	In the event the containment floor and equipment sump monitoring system is inoperable, the CTS allows continued operation for up to 30 days. The ITS retains this allowance but adds the conditional action to perform a RCS water inventory balance once per 24 hours in accordance with ITS SR 3.4.13.1 during this 30-day period.	3.4.15 Action A	3.4.6.1 Action

(C) Catawba specific
(M) McGuire specific

TABLE M - MORE RESTRICTIVE CHANGES
SECTION 3.5 EMERGENCY CORE COOLING SYSTEM

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.5 M.1 (M)	The CTS surveillance allowance for valves to be realigned from required positions when placing the RHR system in service and for PIV testing for CTS 4.4.6.2.2 was revised by the addition of limits on the time for realignment for PIV testing in the ITS LCO. The new limitations restrict the time to 2 hours and allows these realignments only in MODE 3. A two hour limit is placed on any configuration that isolates, at a given time, both trains of Safety Injection. The present requirement places no time limit on the testing.	3.5.2	4.5.2.a
3.5 M.2	The CTS requirement that the power be removed from the accumulator isolation valve when RCS pressure is greater than 2000 psig was revised to require that the power be removed when RCS pressure is greater than 1000 psig.	SR 3.5.1.5	4.5.1.1.c
3.5 M.3	The CTS surveillance allowance to only verify RWST temperature when the ambient temperature is outside the limit has been deleted. The corresponding ITS surveillance will be performed every 24 hours regardless of the ambient outside air temperature.	SR 3.5.4.1	4.5.4.b (C) 4.5.5.b (M)
3.5 M.4	The CTS Surveillance Requirement for the measurement of controlled leakage at an RCS pressure of 2235 $\pm$ 20 psig with an exception to the requirements of SR 4.0.4 in MODES 3 and 4 was revised by the addition of the requirement that the seal injection flow (controlled leakage) be demonstrated within limit with the centrifugal charging pump operating and the charging flow control valve full open and by the addition of an explicit allowance and time limit for completing the surveillance.	SR 3.5.5.1	4.4.6.2.1.c
3.5 M.5	The CTS action requirement to restore an inoperable ECCS subsystem to operable status without a specific time limit was revised to require that action be initiated immediately to restore an ECCS subsystem to operable status.	3.5.3 Action A	3.5.3 Action B

(C) Catawba specific
(M) McGuire specific

TABLE M - MORE RESTRICTIVE CHANGES
SECTION 3.6 CONTAINMENT SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.6 M.1	The CTS Actions were revised to establish a one hour time limit for verifying the OPERABLE air lock door is closed, when the other door is inoperable. The CTS requirements do not currently specify a time.	3.6.2 Actions	3.6.1.3 Action a.1
3.6 M.2	The CTS Actions that address any air lock inoperability other than an inoperable door were revised by the addition of an immediate action to evaluate the overall containment leakage rate requirement of LCO 3.6.1, "Containment," and establishes a one hour time limit to verify one air lock door closed in the affected air lock. The CTS does not contain similar Actions.	3.6.2 Action C	3.6.1.3 Action b
3.6 M.3	An action was added to the CTS LCOs for containment isolation valves to verify that isolated penetration flow paths remain closed. These are penetrations that have been isolated due to an inoperable isolation valve. The actions require isolation valves be verified every 31 days and prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days. In addition, valves with resilient seals are required to be tested every 92 days when the purge valves are closed to isolate an inoperable isolation valve.	3.6.3 Actions A, C, and F	3.6.3 and 3.6.1.9 Actions
3.6 M.4	The CTS completion time for reaching MODE 5 was reduced from 42 to 36 hours. The intermediate completion time to reach MODE 4 in the CTS Action was bounded by the overall completion time and was deleted. The ITS Actions require the unit be placed in MODE 3 in 6 hours and in MODE 5 in the following 30 hours. The elimination of the CTS 6 additional hours to reach MODE 5 is more restrictive.	3.6.13 Action D	3.6.5.3 Action b
3.6 M.5	Not used.		
3.6 M.6	Not used.		
3.6 M.7	An additional surveillance was added to the CTS to verify each door in each access opening to the reactor building is closed, except when the access opening is being used for normal transit entry and exit.	SR 3.6.16.1	4.6.1.7

(C) Catawba specific
(M) McGuire specific

TABLE M - MORE RESTRICTIVE CHANGES
SECTION 3.6 CONTAINMENT SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.6 M.8	If the CTS Actions for inoperable hydrogen igniters can not be satisfied, CTS LCO 3.0.3 must be entered which requires action within 1 hour or a shutdown to MODE 3 in the following 6 hours. The corresponding ITS requires that if these same actions cannot be met the plant must be placed in MODE 3 within 6 hours. This change is slightly more restrictive since the CTS would provide 1 additional hour.	3.6.9 Action C	3.6.4.3 Actions a and b
3.6 M.9	The CTS requirement to verify that the intermediate deck doors are free of frost accumulation was revised to require verifying that the doors are not impaired by ice, frost, or debris. The new requirement is more restrictive than the current stated requirements.	SR 3.6.13.2	4.6.5.3.2.a

(C) Catawba specific
(M) McGuire specific

TABLE M - MORE RESTRICTIVE CHANGES
SECTION 3.7 PLANT SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.7 M.1	Not used.		
3.7 M.2 (M)	The CTS Action to place the plant in Cold Shutdown within 30 hours was revised to require the plant to be brought to MODE 4 (outside the Applicability) within 12 hours.	3.7.1	3.7.1.1
3.7 M.3	The exception in the CTS MSIV Applicability in Modes 2 and 3 was revised by the addition of a restriction requiring that inoperable MSIVs be de-activated as well as closed.	3.7.2	3.7.1.4
3.7 M.4	The CTS Actions to close an inoperable MSIV in MODE 2 and 3 were revised by the addition of an 8 hour time limit to close the valve and a requirement to verify the MSIV closed once per 7 days.	3.7.2 Action C	3.7.1.4
3.7 M.5	The CTS Plant Systems Section was revised by the addition of a new LCO containing requirements for the Main Feedwater Control Valves (MFCVs), Main Feedwater Isolation Valves (MFIVs), their bypass valves and the tempering valves (C), or the MFW to AFW Nozzle Bypass Vales (M) . The new ITS requirements add an LCO, as well as the associated Actions, and Surveillance Requirement for the valves.	3.7.3	3.7
3.7 M.6 (M)	The CTS Plant Systems section was revised to include specific requirements for the Steam Generator Power Operated Relief Valves (SG PORVs). The new requirements include a new LCO, Actions, and Surveillance Requirements for these valves.	3.7.4	3.7
3.7 M.7	The CTS requirements for AFW were revised to include requirements to address the condition where a steam generator is being required for heat removal in Mode 4. In this condition, an Operable AFW train must be available to supply a source of makeup water to the required steam generator. This change represents new operability requirements for the AFW.	3.7.5	3.7.1.2
3.7 M.8	The CTS Action were revised by the addition of a new Actions Condition which requires the restoration of the affected trains within 10 days from discovery of failure to meet the requirements of the LCO. This addition represents a new restriction on plant operation.	3.7.5	3.7.1.2

(C) Catawba specific
(M) McGuire specific

TABLE M - MORE RESTRICTIVE CHANGES
SECTION 3.7 PLANT SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.7 M.9 (C)	(Unit 1 only) The CTS Plant System Section was revised by the addition of a new specification for the Condensate Storage System. The new ITS LCO includes a surveillance to periodically verify required inventory and action requirements to restore the inventory to within the limit within 7 days or commence a plant shutdown .	3.7.6	3.7
3.7 M.10	Not used.		
3.7 M.11	The CTS Applicability was revised by the addition of "during movement of irradiated fuel assemblies" Other related changes involve actions to alleviate these potential hazards with various levels of Control Room ventilation degradation. This change imposes new restrictions on plant operation.	(C) 3.7.10 (M) 3.7.9	3.7.6
3.7 M.12 (C)	The CTS CRAVS LCO is revised by the addition of a new Surveillance Requirement that requires the CRAVS trains to be started on a simulated or actual actuation signal once per 18 months.	SR 3.7.10.3	3.7.6
3.7 M.13	Not used.		
3.7 M.14	Not used.		
3.7 M.15	The CTS CRAVS Applicability is revised by the addition of "during movement of irradiated fuel assemblies". This change imposes new restrictions on plant operation.	(C) 3.7.11 (M) 3.7.10	3.7.6
3.7 M.16	Not used.		
3.7 M.17	Not used.		
3.7 M.18	The CTS requirement for the determination of DOSE EQUIVALENT I-131 to be performed once per 31 days whenever the gross radioactivity determination indicates concentrations greater than or equal to 10% of the allowable limit for radioiodines and once per 6 months whenever the gross radioactivity determination indicates concentrations less than or equal to 10% of the allowable limit for radioiodines was revised to simply require the DOSE EQUIVALENT I-131 to be determined once per 31 days, regardless of the gross radioactivity.	(C) SR 3.7.17.1 (M) SR 3.7.16.1	4.7.1.3

(C) Catawba specific
(M) McGuire specific

TABLE M - MORE RESTRICTIVE CHANGES
SECTION 3.7 PLANT SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.7 M.19	The FHVES CTS surveillance requirements were revised by the addition of a requirement to test the filter bypass damper on a 18 month frequency. This new surveillance requirement represents an additional limitation on plant operation.	(C) SR 3.7.13.5 (M) SR 3.7.12.5	4.9.11
3.7 M.20 (M)	The CTS surveillance requirements were revised by the addition of a requirement to operate the FHVES for 15 minutes or greater prior to the movement of irradiated fuel. This new surveillance requirement represents an additional limitation on plant operation.	SR 3.7.12.2.	4.9.11
3.7 M.21(C)	The CTS requirements for the maximum allowable power range neutron flux high setpoints, in RTP, for conditions of inoperable safety valves on any operating steam generators were revised consistent with the Nuclear Safety Advisory Letter (NSAL) 94-001 from Westinghouse. The maximum allowable power range neutron flux high setpoints specified in the CTS were reduced in the ITS.	Table 3.7.1-1	Table 3.7-1
3.7 M.22 (C)	The CTS requirements for the SG PORVs have been revised by the addition of a surveillance requirement for the SG PORV block valves. The ITS requires that the SG PORV block valves be cycled every 18 months.	SR 3.7.4.3	4.7.1.6
3.7 M.23 (C)	(Unit 2 only) The CTS Applicability for the Condensate Storage System was revised by the addition of the requirement that the Condensate Storage System be Operable if a steam generator is required for heat removal in Mode 4. In addition, appropriate Actions to support this new Applicability have been added as well.	3.7.6	3.7.1.5
3.7 M.24 (C)	(Unit 2 only) The CTS requirement to restore an inoperable Condensate Storage System (CSS) within 4 hours or verify the SNSWP as a backup source of water to the AFW System was revised by the addition of a requirement that the SNSWP continued to be verified an OPERABLE source of backup water to the CSS every 12 hours after the initial verification.	3.7.6 Action A	3.7.1.5

(C) Catawba specific
(M) McGuire specific

TABLE M - MORE RESTRICTIVE CHANGES
SECTION 3.8 ELECTRICAL POWER SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.8 M.1	The CTS Actions were revised by the addition of a second Completion Time requirement for the return of an inoperable AC source, either an offsite circuit or a DG, to OPERABLE status. In addition to the 72 hours requirement, a 6 day limit from discovery of failure to meet the LCO is added to limit the total time that the LCO is not met.	3.8.1 Required Actions A.3 and B.4	3.8.1.1 Action a and Action c
3.8 M.2	The CTS Actions were revised by the addition of an Action that requires declaring a required feature inoperable in 12 hours when both offsite circuits and a required redundant feature are inoperable.	3.8.1 Required Action C.1	3.8.1.1 Action e
3.8 M.3	The CTS was revised by the addition of a new ITS Action. The new Action requires that a redundant required feature must be declared inoperable in 24 hours when one offsite circuit and a required feature are inoperable.	3.8.1Required Action A.2	3.8.1.1 Action a
3.8 M.4	Not used.		
3.8 M.5	The CTS surveillance requirement to perform a load rejection test on the DG and the CTS surveillance requirement for a DG be loaded and operated for 24 hours were revised to require that when the DG is paralleled with offsite power these tests must be performed at a DG power factor of $\leq$ 0.9.	(C) SRs 3.8.1.9 and 3.8.1.14	(C) 4.8.1.1.2.g.2, 4.8.1.1.2.g.7 (M) 4.8.1.1.2.e.2, 4.8.1.1.2.e.8
3.8 M.6	The CTS surveillance for the DG was revised by the addition of a new requirement that the emergency bus be verified to remain energized from the offsite source after the DG start.	SR 3.8.1.12	(C) 4.8.1.1.2g 5) (M) 4.8.1.1.2e.5
3.8 M.7	The CTS requirement for testing both DGs with a simultaneous start once every 10 years was revised to include acceptance criteria for both voltage and frequency requirements.	SR 3.8.1.20	(C) 4.8.1.1.2.h (M) 4.8.1.1.2.f
3.8 M.8	Not used.		
3.8 M.9	The CTS action requirements were revised by the addition of an ITS Action to declare required features inoperable when no offsite power is available. This new Action establishes requirements on plant operation that did not previously exist.	3.8.2 Required Action A.1	3.8.1.2
3.8 M.10	Not used.		

(C) Catawba specific
(M) McGuire specific

TABLE M - MORE RESTRICTIVE CHANGES
SECTION 3.8 ELECTRICAL POWER SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.8 M.11	Not used.		
3.8 M.12	Not used.		
3.8 M.13 (C)	Deleted the CTS action requirement which allowed continued operation temporarily in the event two 125 VDC batteries and/or their full-capacity chargers are inoperable. ITS 3.8.4 does not include an Action for the condiiton of two or more channels of DC inoperable; thus ITS would requires immediately entering LCO 3.0.3 which requires a plant shutdown.	3.8.4 Actions LCO 3.0.3	3.8.2.1 Action e
3.8 M.14	The CTS requirements for the batteries were revised by the addition of an ITS Action to verify that the battery cell parameters are within the Category C limits every 7 days after the initial 24 hour verification.	3.8.6 Required Action A.2	Table 4.8-3
3.8 M.15	The CTS battery cell parameter requirements were revised by the deletion of the temperature compensation allowance from the float voltage limit of Category B parameter requirements. This change also deletes an allowance to adjust the float voltage range.	3.8.6 Table 3.8.6-1	Table 4.8-3, footnote (6) - (C), footnote (c) - (M)
3.8 M.16	The CTS Actions were revised by the addition of a second Completion Time requirement to limit the time the LCO is not met. This additional requirement limits the time from discovery of failure to meet the LCO to a total time of 16 hours.	3.8.9 Actions	3.8.2.1 Actions 3.8.3.1 Actions
3.8 M.17	The CTS Applicability requirements for the AC or DC sources or inverters in MODES 5 or 6 was revised to include "during movement of irradiated fuel assemblies." (M) The CTS Actions were also revised by the addition of the following requirements to immediately: declare the affected required features inoperable or, suspend Core Alterations, suspend movement of irradiated fuel assemblies, initiate action to suspend operations involving positive reactivity additions, and initiate action to restore required equipment to OPERABLE status. For inoperable distribution systems, the ITS also added requirements for cascading to the applicable RHR LCO and declaring the affected LTOP features inoperable (M).	3.8.2 (C) 3.8.5 3.8.8 3.8.10	(C) 3.8.1.2, 3.8.2.2, and 3.8.3.2 (M) 3.8.2.2 or 3.8.3.2
3.8 M.18	Not used.		

(C) Catawba specific
(M) McGuire specific

TABLE M - MORE RESTRICTIVE CHANGES
SECTION 3.8 ELECTRICAL POWER SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.8 M.19 (C)	The CTS DG requirements were revised by the addition of specific surveillance requirements for the lubricating oil inventory and the starting air receiver pressure.	SR 3.8.3.2 and 3.8.3.4	4.8.1.1
3.8 M.20	The CTS DG surveillance requirements were revised by the addition of two notes. The Notes require the performing the surveillance on only one diesel at a time and immediately following the performance of either ITS SR 3.8.1.2 or 3.8.1.7, without a shutdown of the diesel.	(C) SR 3.8.1.8 Notes (M) SR 3.8.1.3 Notes	4.8.1.1.2 a.5
3.8 M.21	Not used.		
3.8 M.22 (M)	The CTS Applicability was revised by the addition the condition of "movement of irradiated fuel assemblies." This change requires the necessary electrical equipment to be Operable whenever irradiated fuel assemblies are being moved.	3.8.2 Applicability	3.8.1.2
3.8 M.23 (M)	The CTS requirements that the DG fuel oil system contain 28,000 gallons of fuel in Modes 5 and 6 and 39,500 gallons of fuel in Modes 1-4 were revised to require that the DG fuel oil system contain 39,500 gallons of fuel whenever the associated DG is required operable, including during Modes 5 and 6.	SR 3.8.3.1	3.8.1.1.b.2 3.8.1.2.b.2
3.8 M.24	The CTS surveillance requirement to start the DG within 5 minutes after the 24 hour run was revised by the addition of a requirement to verify steady state voltage and frequency during the restart test.	SR 3.8.1.15	(C) 4.8.1.1.2.g.15 (M) 4.8.1.1.2.e.8
3.8 M.25 (C)	The CTS requirements for the DG were revised by the addition of specific DG lube oil requirements (SR and Action). This change represents an additional restriction for plant operation.	3.8.3	3.8.1.1
3.8 M.26 (C)	The CTS requirements for the DG were revised by the addition of specific DG air start pressure requirements (SR and Action). This change represents an additional restriction for plant operation.	3.8.3	3.8.1.1
3.8 M.27	The CTS notes which provided allowances regarding disconnecting a vital bus from its DC source for 24 hours and for disconnecting an inverter during a battery equalizing charge were deleted.	3.8.7 3.8.9	3.8.2.1 3.8.3.1

(C) Catawba specific
(M) McGuire specific

TABLE M - MORE RESTRICTIVE CHANGES
SECTION 3.8 ELECTRICAL POWER SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.8 M.28 (M)	Deleted the CTS allowance for testing of the battery capacity via a dummy load at ≥ 440 amps for 60 minutes while maintaining the battery terminal voltage ≥ 105 VDC.	3.8.4	4.8.2.1.2 d.2
3.8 M.29	If the required AC sources are inoperable when the plant is in Mode 5 with the RCS loops not filled or in Mode 6 with water level less than 23 feet, the CTS requires immediately initiating action to restore the required AC sources to operable status. This action requirement was revised to require these actions in Mode 5 or Mode 6 or during movement of irradiated fuel regardless of whether loops are not filled or water level is below 23 feet. The expansion of the applicability of the Actions is more restrictive.	3.8.2 Required Actions A.2.4 and B.4	3.8.1.2 Action
3.8 M.30	The CTS limits for battery cell specific gravity which specify that battery charging current be less than 2 amps when on float charge were revised to limit the use of the float charge current for meeting specific gravity requirements to 7 days and to require that specific gravity be measured prior to expiration of the 7 days.	Table 3.8.6-1 Note (c)	Table 4.3-8 footnote (b)

(C) Catawba specific
(M) McGuire specific

TABLE M - MORE RESTRICTIVE CHANGES
SECTION 3.9 REFUELING OPERATIONS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
3.9 M.1 (M)	A separate specification, ITS 3.9.2, has been added to specify unborated water sources valves be closed and appropriate action requirements if they are not. In particular, the ITS 3.9.2 Actions require immediate suspension of Core Alterations and immediate initiation of actions to secure the valve(s) in the closed position and the verification of boron concentration within 4 hours.	3.9.2	4.9.1.3
3.9 M.2	Not used.		
3.9 M.3 (M)	The ITS include a new requirement that action be initiated immediately to restore one source range neutron flux monitor to operable status.	3.9.3	3.9.2
3.9 M.4	A new Surveillance Requirement is added to the CTS which requires a 7 day verification that the breakers are aligned and that indicated power is available to the required RHR pump that is not in operation	SR 3.9.6.2 (M) 3.9.5.2 (C)	3.9.8.2
3.9 M.5	The new ITS Actions require in addition to immediately suspending the movement of irradiated fuel assemblies in containment, that CORE ALTERATIONS also be suspended.	3.9.6 (C) 3.9.7 (M)	3.9.9
3.9 M.6 (M)	CTS 3.9.9 is applicable during movement of fuel assemblies or control rods within the reactor vessel when the fuel moved or seated is irradiated. The ITS replaces this with "during core alterations" which captures these same requirements. Additionally, the ITS expands the applicability to include movement of irradiated fuel within containment.	3.9.7	3.9.9
3.9 M.7 (C)	The CTS requires 23 feet of water over the reactor vessel flange during movement of fuel assemblies or control rods in Mode 6. The ITS requires this LCO to be applicable during core alterations or any movement of irradiated fuel within containment, regardless of Mode.	3.9.6	3.9.9

(C) Catawba specific
(M) McGuire specific

TABLE M - MORE RESTRICTIVE CHANGES
SECTION 4.0 DESIGN FEATURES

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
4.0 M.1 (M)	A new requirement for the new fuel and spent fuel storage areas containing a nominal maximum of 4.75% by weight enrichment of U-235 has been added to the CTS.	4.3.1.1.a and 4.3.1.2.a	5.6.1.a and 5.5.1.B

(C) Catawba specific
(M) McGuire specific

TABLE M - MORE RESTRICTIVE CHANGES
SECTION 5.0 ADMINISTRATIVE CONTROLS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENT	CTS REQUIREMENT
5.0 M.1	The CTS requirement for written procedures for the Offsite Dose Calculation Manual (ODCM) was revised by ITS Specification 5.5 which requires all programs to have written procedures established, implemented, and maintained covering the activities of the programs.	5.4.1.e	6.8.1.f
5.0 M.2	Not used.		
5.0 M.3	The CTS requirements for the Post Accident Sampling program to ensure the capability to obtain radioactive iodines in plant gaseous effluents was revised to add the requirement that ensures the capability to obtain and analyze radioactive gases in plant gaseous effluents.	5.5.4	6.8.4.e
5.0 M.4	The CTS, "Annual Radiological Environmental Operating Report" requirement was revised to include more detail of what the report should entail.	5.6.2	6.9.1.6
5.0 M.5	A new program (Safety Function Determination Program) has been added to the CTS Administrative Controls. The addition of this program is considered a more restrictive change due to the broader application of the requirement to evaluate the need to "cascade" for every entry into multiple LCO Actions simultaneously.	5.5.15	6.8
5.0 M.6	A new program (Bases Control Program) has been added to the CTS Administrative Controls. The new administrative requirement requires the plant to develop and adopt a program which will perform a TS bases control function.	5.5.14	6.8
5.0 M.7 (M)	The CTS requirements for the unit staff were revised by the addition of a statement requiring the operations superintendent to hold an SRO license.	5.2.2.g	6.2.2
5.0 M.8	The CTS requirements for secondary water chemistry to inhibit steam generator tube degradation were revised to include the low pressure turbine disc stress corrosion cracking as part of this program.	5.5.10	6.8.4.c

(C) Catawba specific
(M) McGuire specific

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 1.0 USE AND APPLICATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
1.0 L.1	CTS CORE ALTERATION definition has been revised to remove the "manipulation of any component within the reactor pressure vessel" from consideration as a CORE ALTERATION. This change maintains CORE ALTERATIONS as movement of only those components which can affect core reactivity. CORE ALTERATIONS is used to specify an Applicability in the TS.	1.1	1.9	I
1.0 L.2	Not used.			
1.0 L.3	The phrase "or actual," in reference to the injected signal, has been added to CTS definitions of ACTUATION LOGIC TEST and CHANNEL OPERATIONAL TEST (COT), as an explicit option to the currently required "simulated" signal. Allowing the use of an actual signal instead of a simulated signal in the ITS definitions is a relaxation of all CTS instrumentation SRs that specify ACTUATION LOGIC TESTS and COTs.	1.1	1.2, 1.3	V

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulation

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 2.0 SAFETY LIMITS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
	There were no "Less Restrictive Changes" in this section.			

(C) Catawba specific
(M) McGuire specific

Categories:

I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.0 LCO AND SR APPLICABILITY

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.0 L.1	Revised the CTS requirement that allows a delay of 24 hours to perform a missed surveillance if the applicable action requirement specifies a time of less than 24 hours to satisfy the associated LCO. Consistent with the corresponding STS, from the time it is discovered that a surveillance has not been performed within the specified interval, the ITS allows a delay in declaring the affected equipment inoperable (LCO not met) for up to 24 hours or up to the limit of the Surveillance Requirement Frequency (whichever is less) regardless of whether the Completion Times of the applicable Required Actions are 24 hours or less. This change provides an automatic SR Frequency extension. Basing the delay time on the surveillance interval is more appropriate than 24 hours for Frequencies under 24 hours. Basing the delay time on the Frequency of the missed SR or 24 hours, whichever is less, may be more or less restrictive, depending on which surveillance is missed and the corresponding CTS and ITS action requirement time limits and surveillance intervals. Whether less or more restrictive, such changes are acceptable for the reasons given in Section III.C of the safety evaluation.	SR 3.0.3	4.0.3	II
3.0 L.2	ITS LCO 3.0.5 was added to establish the allowance of restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS.	LCO 3.0.5	3.0	IV

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.1 REACTIVITY CONTROL SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.1 L.1	The CTS LCO for "Shutdown Margin - T_{avg} greater than 200 °F" was revised by the addition of appropriate actions consistent with the associated surveillance requirement for performing an overall core reactivity balance. The new Actions to be taken in the event the overall core reactivity balance did not meet the surveillance requirement allow a Completion Time of 72 hours for re-evaluation of core design, safety analysis and a determination if the core is acceptable for continued operation. In addition, appropriate operating restrictions and surveillance requirements must be established or the plant is required to be placed in MODE 3 within 6 hours.	3.1.2	4.1.1.1.2	IV
3.1 L.2	CTS 4.1.1.3.b specifies a measurement of MTC at 300 ppm, and if not within the limit, to continue the surveillance and measure MTC every 14 effective full power days (EFPDs). This is revised in the ITS by the addition of a note that allows the performance of the surveillance not to be repeated if the measured MTC at the 60 ppm surveillance is less than the COLR limit.	SR 3.1.3.2	4.1.1.3.b	II
3.1 L.3	Delete the CTS action requirement to reduce the High Neutron Flux Trip Setpoints to ≤ 85% of RTP when a rod is not restored within alignment limits.	3.1.4 Action B	3.1.3.1 Action c.3.d	IV
3.1 L.4	Not used.			
3.1 L.5	Deleted the CTS Surveillance requirement to verify shutdown rod insertion limits within 15 minutes prior to withdrawal of any control rods in Control Banks A, B, C or D during an approach to criticality.	SR 3.1.5.1	4.1.3.5.a	VII
3.1 L.6	The CTS Actions which address one shutdown rod not within insertion limits were revised to address one or more shutdown banks out of limit.	3.1.5 Actions	3.1.3.5 Actions	IV

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.1 REACTIVITY CONTROL SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.1 L.7	The CTS Actions for one digital rod position indication per bank and one demand position indicator per bank inoperable were revised to address one or more rod position indication and demand position indication systems in one or more groups or banks inoperable. In addition, a Note was also added to the Actions allowing separate entry conditions for each rod position indicator per each group and for each demand position indicator per bank.	3.1.7 Action A and Action C; 3.1.7 Actions Note	3.1.3.2 Actions	IV
3.1 L.8	The CTS Action to verify the position of a rod with inoperable position indication immediately after any movement more than 24 steps in one direction was revised to allow 4 hours for this verification instead of immediately.	3.1.7 Actions	3.1.3.2 Actions	III
3.1 L.9	The CTS surveillance requirement for the digital rod position indicator that specifies the verification of DRPI with the Demand Position Indication system every 12 hours is revised to verify the DRPI agrees within 12 steps of the demand indicator over the entire range of rod travel once prior to criticality after each removal of the reactor head.	SR 3.1.7.1	4.1.3.2	II
3.1 L.10	The CTS requirement that each Intermediate and Power Range instrument be subjected to an Analog Channel Operational Test within 12 hours prior to the start of PHYSICS TESTS was revised to simply require the same test be performed prior to PHYSICS TESTS without sp cifying a preset time prior to the start of PHYSICS TESTS.	SR 3.1.8.1	4.10.3.2	II
3.1 L.11	The CTS surveillance frequency for rod freedom of movement (every 31 days) was extended to 92 days.	SR 3.1.4.2	4.1.3.1.2	II
3.1 L.12	The CTS requirement to verify rod drop times following head removal, maintenance or modifications on rods, and every 18 months was revised to specify the performance of this verification only following head removal.	SR 3.1.4.3	4.1.3.4	II

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.1 REACTIVITY CONTROL SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.1 L.13	The CTS requirement to verify digital rod position agreement with the group demand counters every 18 months was revised to require this verification following head removal.	SR 3.1.7.1	4.1.3.3	II
3.1 L.14	Deleted the CTS requirement to submit a special report to the NRC in the event that MTC exceeds the upper limit.	3.1.2	3.1.1.3 Action a.3	VIII

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.2 POWER DISTRIBUTION LIMITS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.2 L.1	The CTS action requirement to reduce the Power Range Neutron Flux - High trip setpoint $\geq$ 1% for each 1% $F_Q^M(X,Y,Z)$ exceeds its limit within 4 hours was revised to allow 72 hours to reduce the trip setpoint.	3.2.1 Required Action A.2	3.2.2 Action a	III
3.2 L.2	The CTS action requirement for reducing the AFD limits within 15 minutes and resetting the AFD alarm setpoints within 8 hours after determining F_Q exceeds the transient limit, was revised to require reducing the AFD operating limits within 4 hours and the requirement to reset the AFD alarm setpoints was eliminated.	3.2.1 Required Actions B.1 and B.2	3.2.2 Action b and 4.2.2.2.c.2.a	III, IV
3.2 L.3	The CTS action requirement that $F_{\Delta H}(X,Y)$ be restored within limit or THERMAL POWER reduced below 5% RTP (in Mode 2) within 2 hours was revised to increase the time allowed to reach Mode 2 from 2 hours to 6 hours.	3.2.2 Required Action B.1	3.2.3 Action C.2.b	III
3.2 L.4	The CTS action requirement to reduce the Power Range Neutron Flux-High Trip setpoints to $\leq$ 55% RTP within 4 hours was deleted.	3.2.3 Action A	3.2.1 Action a.2	IV
3.2 L.5	Deleted the CTS SR Frequency monitoring AFD, for each OPERABLE excore channel, once per hour for 24 hours after restoring the AFD alarm to operable status and for monitoring once per hour for 24 hours and once per 30 minutes thereafter when the alarm is inoperable.	3.2.3	4.2.1.1.a.2, 4.2.1.1.b	Unique
3.2 L.6	The CTS action requirement for QPTR to be calculated once per hour until the limit is restored or until thermal power is reduced to less than 50% RTP, that is, out of the mode of applicability, is revised to require determining QPTR once per 12 hours and an associated power reduction of 3% from RTP for each 1% QPTR exceeds the limit.	3.2.4 Required Action A.2	3.2.4 Action a.1	IV, III
3.2 L.7	Not used.			
3.2 L.8	The CTS action requirements for QPTR to be restored within limits in 24 hours or reduce power to less than 50% RTP in 2 hours, and subsequently verifying QPTR every 12 hours, have been deleted.	3.2.4 Action A	3.2.4, Actions a.3 and a.4	IV

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulation

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.2 POWER DISTRIBUTION LIMITS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.2 L.9	The CTS action requirements which specify that QPTR be calculated once per hour and power be reduced have been deleted.	3.2.4 Action A	3.2.4, Actions b and c	IV
3.2 L.10	The CTS action requirement for the Power Range Neutron Flux - High trip setpoint to be reduced $\geq$ 3% for each 1% QPTR exceeds its limit within 4 hours was revised to allow 72 hours to reduce the trip setpoint.	3.2.4 Required Action A.4	3.2.4 Action a.2.b	III
3.2 L.11	The CTS action requirements that allow 6 hours to either restore $F^{M}_{\Delta H}(X,Y)$ to within limits or reduce the Power Range Neutron Flux trip setpoint were revised to allow 8 hours to perform these actions.	3.2.2 Required Actions A.2.1 and A.2.2	3.2.3, Actions b.1 and b.2	III

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulation

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.3 INSTRUMENTATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.3 L.1	The requirement to reduce the power range neutron flux high trip setpoints is deleted.	3.3.1 Condition D	Table 3.3-1, Action 2.c	IV
3.3 L.2	The CTS Action requirement for the Intermediate Range monitors between P-6 and P-10 which specifies that an inoperable channel must be restored to OPERABLE status prior to increasing power above 10% was revised to require power to be adjusted to either below P-6 or above P-10 within 2 hours.	3.3.1, Condition F	Table 3.3-1, Action 3.b	IV
3.3 L.3	The CTS requirements for the Intermediate Range Neutron Flux Instrumentation (when below P-6) to be restored to operable status prior to increasing THERMAL POWER above P-6 with one channel inoperable were revised to provide the same action when two channels are inoperable. CTS requires entry into 3.0.3.	3.3.1, Condition H	Table 3.3-1, Action 3.a	IV
3.3 L.4	The CTS requirements for the RTBs were revised by the addition of a one hour Completion Time to restore the RTBs to operable status. This one hour is in addition to the 6 hours currently allowed to be in mode 3.	(C) 3.3.1, Action Q (M) 3.3.1, Action R	Table 3.3-1, Action 9	III
3.3 L.5	The CTS 3.3.1 S/U (startup) frequencies for the Power Range Neutron Flux Low, Source Range Neutron Flux, and Intermediate Range Neutron Flux Channel Operational Test requirements were revised from 31 days prior to startup to 92 days prior to startup.	SR 3.3.1.7 and SR 3.3.1.8	Table 4.3-1	III
3.3 L.6	The requirement in the CTS for the AFW Pump Manual Initiation Function has been deleted.	Table 3.3.2-1	Tables 3.3-3, 3.3-4, and 4.3-2	VI
3.3 L.7 (C)	The requirement in the CTS for the Turbine Trip Manual Initiation Function has been deleted.	Table 3.3.2-1	Tables 3.3-3, 3.3-4, and 4.3-2	VI
3.3 L.8	The CTS Completion Time of 7 days for an inoperable channel of post accident monitoring (PAM) instrumentation was revised to 30 days.	3.3.3, Condition B	3.3.3.6 Action a (M), a and c (C)	III

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirements
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.3 INSTRUMENTATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.3 L.9	The CTS requirements for inoperable PAM channels that specify a unit shutdown when one required channel is inoperable and the actions cannot be completed were revised to allow continued operation in this condition for functions with two required channels and to those with one required channel if the associated diverse channel or alternate monitoring method is operable provided a special report is written to the NRC detailing the planned corrective actions.	3.3.3 Conditions C and H	3.3.3.6 Action a and 3.6.4.1 Action a	IV
3.3 L.10	The CTS Completion Times (48 hours and 72 hours) for inoperable PAM channels were extended to 7 days for all channels, except hydrogen monitors which were extended from 48 hours to 72 hours.	3.3.3 Conditions D, E, and F	3.3.3.6 Action b (C), Action 3.7.4.a (M)	III
3.3 L.11	The CTS requirements for the Hydrogen Monitors that specify a channel check once per 12 hours, a monthly analog channel operational test, and a channel calibration 92 days on a staggered test basis were revised to require a channel check once per 31 days and a channel calibration once per 92 days. The channel operational test was eliminated.	SR 3.3.3.1 and SR 3.3.3.2	4.6.4.1	II
3.3 L.12	The CTS requirement for the inoperable remote shutdown system instrument channels to be restored to operable status within 7 days was increased from 7 days to 30 days.	3.3.4 Condition A	3.3.3.5 Action a	III
3.3 L.13	The CTS requirement for both the auxiliary feedwater flow and the steam generator level as separate indication of Decay Heat Removal via the SGs was revised to allow the use of either one or the other indicators rather than both.	Table 3.3.4-1	Table 3.3-9	VI
3.3 L.14 (M)	CTS PAM requirement for a CHANNEL CALIBRATION to be performed every refueling was revised by the addition of a Note allowing the neutron detectors to be excluded from the CHANNEL CALIBRATION.	SR 3.3.3.3	Table 4.3-7	V

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirements
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.3 INSTRUMENTATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.3 L.15 (C)	The CTS Actions for Loss of Power (LOP) Instrumentation that require an LCO 3.0.3 entry if the required actions cannot be met were revised to require entry into the applicable Condition(s) and Required Action(s) for the associated DG made inoperable by LOP Instrumentation.	3.3.5 Condition C	Table 3.3-3 Action 15	IV
3.3 L.16 (M)	The CTS Actions for LOP Instrumentation that specify an entry into CTS 3.8.1.1 with more than one channel inoperable were revised to provide 1 hour to restore one channel to operable status and if the Required Actions for one or more inoperable channels are not met, the revised actions require entry into the applicable Condition(s) and Required Action(s) for the associated DG made inoperable by LOP Instrumentation.	3.3.5 Conditions A, B, and C	Table 3.3-3 Action 15a	IV
3.3 L.17	The CTS requirements for Containment Purge and Exhaust Isolation Instrumentation that allow operation to continue with one or more channels inoperable provided the containment purge valves are maintained closed are revised to require ITS LCO 3.6.3 to be entered immediately if one or more manual or automatic actuation trains are inoperable. ITS LCO 3.6.3 allows 4 hours to isolate the penetration with an inoperable containment isolation valve.	3.3.6 Condition A	Table 3.3-3, Action 17	III
3.3 L.18 (C)	The CTS Completion Time of 48 hours to restore operability when one CRAVS system actuation instrumentation channel is inoperable or initiate and maintain filtered flow through the system was revised to increase the Completion Time for the CRAVS system actuation instrumentation to 7 days when one channel is inoperable and requires that the train with the inoperable actuation instrumentation be placed in operation.	3.3.7 Condition A	Table 3.3-3, Action 24	III

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
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III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirements
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.3 INSTRUMENTATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.3 L.19 (C)	The lack of CTS Actions when one or more functions have more than one required channel of CRAVS actuation instrumentation inoperable was revised by the addition of ITS Actions that require one CRAVS train to be immediately verified in operation and to immediately enter the applicable Conditions and Required actions of ITS 3.7.10 for one CRAVS train made inoperable by the inoperable CRAVS actuation instrumentation. CTS would require entry into 3.0.3.	3.3.7 Condition B	Table 3.3-3, Action 24	IV
3.3 L.20 (C)	CTS Action requirement that the unit be in mode 3 in 6 hours and mode 4 in the following 6 hours if one channel of the automatic actuation logic is inoperable was revised to increase the Completion Time for the ABFVES actuation instrumentation function to 7 days.	3.3.8 Condition A	Table 3.3-3, Action 21a	III
3.3 L.21	Not used.			
3.3 L.22 (M)	The CTS Actions that allow operation to proceed with one inoperable channel (placed in trip) until the next performance of the COT were revised by the addition of a note that allows the channel to be placed in bypass for surveillance testing on other channels.	3.3.2 Conditions D, J and P	Table 3.3-3 Actions 15 and 15b	IV
3.3 L.23 (C)	The CTS requirements for Diesel Building Ventilation support system operability have been deleted in the ITS.	3.3.2	Table 3.3-3, 3.3-4, and 4.3-2	VI
3.3 L.24	The RTS CTS Action for an inoperable power range channel that requires power to be reduced to less than or equal to 75% within 4 hours or QPTR to be monitored using the movable incore detectors every 12 hours was revised to require that either QPTR be verified or power be reduced to less than or equal to 75% within 12 hours.	3.3.1 Action D.1.2	Table 3.3-1 Action 2c	III
3.3 L.25	The CTS Actions which allow operation to proceed with one inoperable channel (placed in trip) until the performance of the next operational test were revised to allow operation to continue indefinitely once the channel is placed in trip.	3.3.5 Condition A	Table 3.3-3, Action 15(C) 15a (M)	IV

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
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IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirements
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.3 INSTRUMENTATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.3 L.26 (C)	The CTS requirements for the "Auxiliary Building Filtered Exhaust Operation (ABFVES) Manual Initiation were deleted from the ESFAS LCO. The deletion includes the Function and all associated Actions and Surveillances.	3.3.2 and 3.3.8	3.3.2 Function 16a	VI
3.3 L.27 (C)	The CTS surveillance requirement which verifies the automatic actuations of the BDMS upon receipt of a trip signal is revised to allow an actual or simulated signal to be used for the testing.	SR 3.3.9.3	4.3.3.11.1.c	V
3.3 L.28 (M)	The CTS Action for an inoperable channel of the Containment Pressure Control System which requires that the inoperable channel be placed in the start permissive mode and that the Actions for the applicable supported systems be entered within one hour was revised to address one or more inoperable channels and to simply declare the supported system inoperable immediately.	3.3.2 Condition P	Table 3.3-3 Action 26	IV
3.3 L.29	The CTS requirements for Accident Monitoring Instrumentation, contain descriptive information regarding the plant unique identifier for some functions. This level of detail is not necessary within the Technical Specification and is deleted.	3.3.3	3.3.3.6, Tables 3.3-10 and 4.3-7	VI
3.3 L.30	The CTS lists of the Readout Location for remote shutdown instrumentation were removed from the TS.	3.3.4	3.3.3.5 Table 3.3-9	VI
3.3 L.31 (C)	The CTS Actions which allow operation to proceed with one inoperable channel (placed in trip) until the performance of the next operational test were revised to allow operation to continue indefinitely once the channel is placed in trip.	3.3.2 Condition D and M	Table 3.3-3, Actions 15 and 15a	IV
3.3 L.32	The CTS surveillance requirements for the PAM, Hydrogen Monitors, and Remote Shutdown System Specifications were revised to only require the channel check surveillance to be performed on normally energized instrumentation.	3.3.3 and 3.3.4	3.3.3.6, 3.6.4.1 3.3.3 5	V

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirements
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.3 INSTRUMENTATION

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.3 L.33	The CTS MODES of Applicability for "Steam Line Isolation" function was revised to exempt this function in MODES 2 and 3 when all MSIVs and associated bypass valves are closed. When these valves are closed, the automatic isolation function is no longer needed.	Table 3.3.2-1 function 4	Table 3.3-3 function 4	I
3.3 L.34	The CTS MODES of Applicability for the Feedwater Isolation Functions was revised to exempt these functions in MODE 2 when all MFIVs, MFCVs, and associated bypass valves are closed and de-activated or isolated by a closed manual valve. When these valves are closed or isolated, and the safety function is accomplished, the automatic isolation function is no longer required.	Table 3.3.2-1 function 5	Table 3.3-3 function 5	I

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirements
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.4 REACTOR COOLANT SYSTEM

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.4 L.1	The CTS requirement for the unit be placed in MODE 2 in 4 hours if DNB parameters are not restored was revised to allow 6 hours to reach MODE 2.	3.4.1 Required Action D.1	3.2.5 Action a	III
3.4 L.2	The CTS requirement for a verification that the average RCS loop temperatures are within limits 15 minutes prior to achieving criticality was deleted.	SR 3.4.2.1	4.1.1.4	VII
3.4 L.3	The CTS requirement that the PORVs to be subjected to a CHANNEL CALIBRATION every 18 months was deleted.	SR 3.4.11.2	4.4.4.1.a	VII
3.4 L.4	The CTS requirement for three RCS loops operable and in operation was revised to base the RCS loop requirements on whether the Rod Control System is capable of rod withdrawal or not.	LCO 3.4.5.a and LCO 3.4.5.b	3.4.1.2	VI
3.4 L.5	The CTS LCO requirement for the RHR Loops was revised by the addition of a Note which permits all RHR loops to be removed from operation during a planned heatup to Mode 4 when at least one RCS loop is in operation.	LCO 3.4.7 Note 4	3.4.1.4.1	VI
3.4 L.6	The CTS requirement for a unit shutdown to MODE 3 with the reactor trip breakers open, within 6 hours, if the pressurizer is inoperable for reasons other than heaters was revised to require this action only for the condition of high water level in the pressurizer.	3.4.9 Action A.1	3.4.3 Action b	IV
3.4 L.7	The CTS requirement that the safety valve lift setpoint is to correspond to ambient (hot) conditions was revised to allow up to 54 hours after entering into MODE 3 to meet this requirement (provided a preliminary cold setting was made prior to heatup).	3.4.10 Applicability (Note)	3.4.2.2 Note *	I

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.4 REACTOR COOLANT SYSTEM

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.4 L.8	The CTS action requirements that permit continued operation if the cause of PORV inoperability is excessive seat leakage, provided the associated block valve is closed within 1 hour, were revised to permit continued operation as long as the inoperable PORV(s) remains capable of being manually cycled in addition to closing the associated block valve within 1 hour. (Excessive seat leakage as a reason for the PORV being inoperable is described in the Bases for ITS 3.4.11 Action A.) This change is less restrictive because it expands the number of ways a PORV can be inoperable without requiring a unit shutdown.	3.4.11 Action A.1	3.4.4 Action a	IV
3.4 L.9 (C)	The CTS requirement to place the controls for one or more inoperable and not closed PORVs in the closed position was revised to require the valve to be placed in manual control.	3.4.11 Action C.1 and Action F.1	3.4.4 Action d	IV
3.4 L.10	The CTS requirement for the performance of an ACOT at least once per 31 days was revised by a Note which allows up to 12 hours after entering the LTOP mode of applicability to complete the required surveillance test.	SR 3.4.12.5	4.4.9.3.1.a	II
3.4 L.11	Deleted the CTS requirements to verify that RCS leakages are within limits by use of the containment atmosphere gaseous or particulate radioactivity and sump level monitors, once per 12 hours, and by use of the reactor head flange leakoff system.	SR 3.4.13.1 N/A N/A N/A SR 3.4.15.1 SR 3.4.15.2 SR 3.4.15.4	4.4.6.2.1.d 4.4.6.2.1.a 4.4.6.2.1.b 4.4.6.2.1.e 4.4.6.1 4.4.6.1 4.4.6.1	Unique
3.4 L.12	In the event of one or more flow paths with leakage from one or more PIVs greater than the limit, the CTS requires isolation of the system via two valves within 4 hours before requiring a unit shutdown. These action requirements are relaxed to permit isolation with just one closed manual, deactivated automatic, or check valve within the first 4 hours and restoration of leakage to within the limits within 72 hours, before requiring a unit shutdown.	3.4.14 Action A.1	3.4.6.2 Action c	III, IV

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.4 REACTOR COOLANT SYSTEM

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.4 L.13	The CTS requirement for the isolation of RCS PIV flow paths with at least two closed manual or deactivated automatic valve was revised to include the provision for use of a check valve.	3.4.14 Required Action A.1	3.4.6.2 Action c	IV
3.4 L.14	In the event of an inoperable RHR system interlock, the CTS for the ECCS during operation in Modes 1, 2, and 3 would require immediately declaring the associated ECCS subsystem inoperable, because a specific action requirement for this condition is not specified. The ITS does specify an Action for this condition and it would allow plant operation to continue indefinitely provided the affected RHR RCS penetration is isolated by use of one closed manual valve or deactivated automatic valve within 4 hours. It would not require declaring the associated ECCS subsystem inoperable.	3.4.14, Required Action C.1 SR 3.4.14.2	3.4.6.2 Actions 4.5.2.d.1	III, IV
3.4 L.15	The CTS requirement for RCS PIV testing to be performed if the plant is in MODE 5 for more than 72 hours was revised to require testing if the unit is in MODE 5 for 7 days or more if leakage testing has not been performed in the previous 9 months.	SR 3.4.14.1	4.4.6.2.2.b	II
3.4 L.16	The CTS requirement to perform PIV leakage testing prior to returning a valve to service following maintenance activities has been deleted.	3.4.14	4.4.6.2.2.c	VII
3.4 L.17	The CTS LCO requirements were revised to require either the particulate or gaseous containment atmosphere monitor to be operable during the mode of applicability (C). In addition, the ITS Actions allow a water inventory balance (SR 3.4.13.1) to be performed as an alternative to the current required action of obtaining and analyzing grab samples of containment atmosphere. The ITS actions also permit indefinite operation with the containment atmosphere radioactivity monitor inoperable provided these compensatory actions are performed. Note that because part of this change is beyond scope, it is discussed in Safety Evaluation Section III.G.7.	LCO 3.4.15 3.4.15 Actions	3.4.6.1	Unique See Safety Evaluation Section III.G.7

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.4 REACTOR COOLANT SYSTEM

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.4 L.18	An exception to LCO 3.0.4 has been added to the action requirements to allow an increase in MODES with inoperable RCS leak detection monitors as long as the associated actions are met.	3.4.15 Actions Note	3.4.6.1 Actions	VI
3.4 L.19 (C)	The CTS shutdown requirement regarding the containment ventilation unit condensate drain tank (CVCDT) level monitoring system operability was revised to permit continued operation provided either a channel check of the required containment atmosphere radioactivity monitor is performed once per 8 hours in accordance with SR 3.4.15.1 or an RCS water inventory balance is performed once per 24 hours in accordance with ITS SR 3.4.13.1.	3.4.15 Action C.1 and C.2	3.4.6.1 Action	Unique
3.4 L.20	The CTS Applicability requirement for limits on RCS specific activity in MODES 1 - 5 was revised to only require limits in MODES 1, 2, and in MODE 3 with RCS Tavg $\geq$ 500°F.	3.4.16 Applicability	3.4.8 Applicability	I
3.4 L.21	The CTS requirement to verify RCS gross radioactivity every 72 hours was revised to require the verification every 7 days.	SR 3.4.16.1	4.4.8 Table 4.4-4, Item 1	II
3.4 L.22	In the event gross specific activity of the RCS exceeds its limit of 100/E µCi/gram, CTS requires verifying DOSE EQUIVALENT I-131 activity within limits within 4 hours and placing the unit outside the mode of applicability in 6 hours. This requirement was revised by deletion of the requirement to perform the verification within 4 hours.	3.4.16 Action B	4.4.8 Table 4.4-4, Item 4	IV
3.4 L.23 (M)	With less than the four required reactor coolant loops in operation, the CTS requires placing the plant in Mode 3 (Hot Standby) within 1 hour; this Completion Time has been relaxed to 6 hours.	3.4.4 Action A	3.4.1.1 Action	III

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
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IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.4 REACTOR COOLANT SYSTEM

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.4 L.24	The CTS requirement for each Intermediate, Power Range, and P-7 interlock instrument to be subjected to an Analog Channel Operational Test within 12 hours prior to the start of PHYSICS TESTS was revised to only require testing prior to startup and PHYSICS TESTS without specifying a preset time.	SR 3.4.17.2	4.10.4.2	II
3.4 L.25	The CTS requirements which limit RCS PIV leakage to 1 gpm were revised to limit leakage to ≤ 0.5 gpm per nominal inch of valve size up to a maximum of 5 gpm at an RCS pressure > 2215 psig and ≤ 2255 psig.	SR 3.4.14.1	3.4.6.2.f , and Table 3.4-1 footnotes	V
3.4 L.26 (M)	The CTS requirements which permit two charging pumps or one safety injection pumps capable of injecting into the RCS when two PORVs are secured open with block valves open and power removed were revised to also permit this allowance when the RCS is depressurized and an RCS vent of greater than or equal to 4.5 square inches is established.	3.4.12 Required Action A.4	3.4.9.3 Action a and Footnote *	Unique See Safety Evaluation Section III.G.7
3.4 L.27	The CTS Action requirement to provide a special report when a PORV or RCS vent is used to mitigate an overpressure event has been deleted.	3.4.12	(C) 3.4.9.3 Action d (M) 3.4.9.3 Action f	VI

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.5 EMERGENCY CORE COOLING SYSTEM

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.5 L.1	The CTS LCO and Surveillance Requirement for the operability of the accumulator pressure and level instruments were deleted from the TS since they are not necessary to meet the requirements of operability for the accumulators.	3.5.1	3.5.1.e (C) 4.5.1.2 (C) 3.5.1.1.e (M) 4.5.1.1.2 (M)	VI,VII
3.5 L.2	The CTS Actions which provide a maximum allowance of 24 hours to restore accumulator boron concentration to within limits specified in the COLR were revised to allow the boron concentration to be restored within 72 hours.	3.5.1	3.5.1 Action C.1 (C); 3.5.1.1 Action C.1 (M)	III
3.5 L.3 (C)	The CTS Surveillance requirement for a verification of the accumulator's boron concentration whenever makeup to the tank exceeds 75 gallons was revised to only require verification of the accumulator's boron concentration after makeup from a source other than the Refueling Water Storage Tank. Thus relaxing the frequency for performing this SR.	SR 3.5.1.4	4.5.1.1.b	II
3.5 L.4	The CTS requirement for an 18 month test to verify that the accumulator isolation valves automatically open (C) or that the accumulator isolation valve automatic power disconnect functions (M) was deleted.	3.5.1	4.5.1.1.1.d (M) 4.5.1.1.d (C)	VII
3.5 L.5	The CTS Actions has been revised to allow inoperabilities on ECCS subsystems in multiple trains.	3.5.2	3.5.2 Action a	IV
3.5 L.6	Not used.			
3.5 L.7	The CTS requirements to verify ECCS throttle valve position after stroking or maintenance and for flow balances after modifications are deleted from the TS.	3.5.2	4.5.2.g.1 4.5.2.h	VII
3.5 L.8	The CTS Action requirement for the unit to be in cold shutdown in 20 hours if the ECCS is not restored in 1 hour was revised to provide 24 hours to be in cold shutdown.	3.5.3	3.5.3 Action a	III

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulation

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.5 EMERGENCY CORE COOLING SYSTEM

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.5 L.9	The CTS Actions that allow 1 hour to restore an inoperable RWST were revised to allow up to 8 hours to restore the RWST to OPERABLE due to the boron concentration or temperature not within limits.	3.5.4	3.5.4	III
3.5 L.10	The CTS Action for an accumulator inoperable due to a closed isolation valve which requires that the valve be opened immediately or a shutdown be initiated was revised to allow 1 hour to correct the inoperability prior to requiring a unit shutdown.	3.5.1	3.5.1.1 Action b (M); 3.5.1 Action b (C)	III
3.5 L.11 (C)	A Note was added to the CTS to allow in Mode 3, both safety injection pumps flow paths to be isolated by closing the isolation valves for up to 2 hours to perform valve testing.	3.5.2	3.5.2	VI
3.5 L.12	The CTS requirement that the RCS controlled leakage be within limits during operation in MODES 1-4 was revised to only require that the limits be maintained in MODES 1-3.	3.5.5	3.4.6.2.e	I
3.5 L.13	The CTS requirement to provide a special report for ECCS actuation was deleted as being redundant to regulatory requirements in 10 CFR 50.73.	3.5.2 3.5.3	3.5.2 Action b 3.5.3 Action c	VIII

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulation

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.6 CONTAINMENT SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.6 L.1	Note 1 was added to the CTS air lock Actions to allow unrestricted access for entry and exit through an inoperable air lock for repairs to air lock components. The Action requirements to close and lock an air lock door remains applicable, with the exception for brief entry and exit of the air lock to perform necessary repairs.	3.6.2 Actions	3.6.1.3 Actions	IV
3.6 L.2	A note was added to the CTS Actions to allow entry and exit into containment via the air locks, if one door in both air locks is inoperable and administrative controls are provided to control access.	3.6.2 Action A	3.6.1.3 Action a	IV
3.6 L.3	A Note was added to the CTS Actions which modifies the requirement to verify an air lock door locked closed every 31 days. The Note allows the verification of locked closed air lock doors, located in a high radiation area, by use of administrative means.	3.6.2 Actions A and B	3.6.1.3 Action a.2	IV
3.6 L.4	The CTS Actions were modified to allow continued operation with one air lock door inoperable. The original requirement limited the Completion Time until the next overall air lock leakage test.	3.6.2 Actions A and B	3.6.1.3 Action a.2	III
3.6 L.5	A Condition and associated Required Actions have been added to the CTS which allow continued operation when the personnel air lock is inoperable due to an inoperable interlock mechanism. Use of the air lock is permissible under the control of a dedicated individual.	3.6.2 Action B	3.6.1.3 Action b	IV
3.6 L.6	The CTS Surveillance Requirement for testing the air lock door interlock mechanism is revised to extend the testing interval from 6 months to 18 months.	SR 3.6.2.2	4.6.1.3.c	II
3.6 L.7	The CTS Actions were revised by the addition of another method of isolating an affected penetration by allowing the use of a check valve inside containment with flow through the valve secured.	3.6.3 Required Action A.1	3.6.3 Action c	IV

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.6 CONTAINMENT SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.6 L.8	The CTS Surveillances and associated footnote which require verification that manual valves and blind flanges inside and outside the containment are closed were modified to permit valves and blind flanges located in high radiation areas to be verified by administrative means. This allowance was also incorporated into the associated ITS Actions which require this verification.	SR 3.6.3.3 and SR 3.6.3.4 3.6.3 Required Actions A.2, C.2 and E.2	4.6.1.1.a, 3.6.3, and 3.6.1.9	V
3.6 L.9	The time limitations applied to opening the containment purge valves (M) and air release and addition valves (C) in the CTS were deleted.	SR 3.6.3.2	3.6.1.9.b and 4.6.1.9.2	V, VI
3.6 L.10	The CTS Action requirement for the combined bypass leakage rate to be within limits prior to increasing the Reactor Coolant System temperature above 200 °F was revised to add an allowance for a 4 hour Completion Time to restore the combined bypass leakage rate limits to within limits if found out of limit above 200 °F.	3.6.3 Action D	3.6.1.2 Action	III
3.6 L.11	A Note was added to the CTS Actions which provides an exception to Specification 3.0.4 that allows MODE changes to be made with one inoperable recombiner.	3.6.7 Required Action A.1	3.6.4.2 Action	IV
3.6 L.12	Not used.			
3.6 L.13	The CTS Surveillance Frequency for a hydrogen recombiner functional test every 6 months was revised to every 18 months.	SR 3.6.7.1	4.6.4.2	II
3.6 L.14	The CTS Applicability of MODES 1, 2, 3, and 4 for the Hydrogen Skimmer System was revised to MODES 1 and 2.	3.6.8 Applicability	3.6.5.6 Applicability	I
3.6 L.15	The CTS Completion Time of 72 hours for a single inoperable train of the Hydrogen Skimmer System was revised to 30 days.	3.6.8 Action A	3.6.5.6 Actions	III
3.6 L.16	Not used.			

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.6 CONTAINMENT SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.6 L.17	A Note was added to the CTS Action to provide an exception to Specification 3.0.4 that would allow MODE changes to be made with one inoperable Hydrogen Skimmer System train.	3.6.8 Required Action A.1	3.6.5.6 Actions	IV
3.6 L.18	The CTS requirement for the surveillances to be performed once per 92 days on a STAGGERED TEST BASIS was revised to require testing once per 92 days without staggering the testing.	SRs 3.6.8.1, 3.6.8.2, 3.6.8.3, and 3.6.8.4	4.6.5.6.1 a, c, and f	II
3.6 L.19	Not used.			
3.6 L.20	The CTS Surveillance Requirements which specify testing be performed once per 31 days or 92 days on a STAGGERED TEST BASIS were revised in the corresponding ITS by the deletion of the requirement to test "on a STAGGERED TEST BASIS".	SRs 3.6.10.1, 3.6.11.1, 3.6.11.2, 3.6.11.3, 3.6.11.4, and 3.6.11.5	4.6. 8.a and 4.6.5. .1 a, b, d, e, and	II
3.6 L.21	The CTS requirement that the structural integrity of the reactor building be met prior to increasing the Reactor Coolant System temperature above 200 °F was revised by the addition of Actions to address the case where structural integrity is found not met when in MODES 1 through 4 (the MODES of applicability). The new Action allows 24 hours to restore the reactor building to OPERABLE status before having to shut down. The CTS does not currently allow any time to restore.	3.6.16 Action A	3.6.1.7 A tions	III
3.6 L.22	The CTS requirement for the negative pressure in the annulus to be verified during the operation of each Annulus Ventilation System (AVS) once per 18 months was revised to require performance of this surveillance every 18 months on a STAGGERED TEST BASIS.	SR 3.6.16.2	4.6.1.8.d.4	II

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.6 CONTAINMENT SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.6 L.23 (C)	The CTS requirement to verify that the containment valve injection water system has a 30 day capacity has been deleted. The required system pressure of 16.2 psig has been replaced with a surge tank pressure of 36.4 psig. The CTS has been revised to require testing of the system at the lower pressure of 36.4 psig rather than the current 45 psig requirement. As a result, more restrictive leakage flow rates (1.29 and 1.16 gpm) are specified.	SRs 3.6.17.1 and 3.6.17.2	4.6.6.1 and 4.6.6.2	Unique See Safety Evaluation Section III.G.12
3.6 L.24	The CTS requirement for isolating penetrations with inoperable containment isolation valves within 4 hours was revised to provide 72 hours to isolate an inoperable isolation valve associated with a closed system.	3.6.3 Action C	3.6.3 Action	III
3.6 L.25	The CTS requirement for testing certain containment isolation valves with resilient seals 6 months on a STAGGERED TEST BASIS was revised in the corresponding ITS by deleting the requirement to test "on a STAGGERED TEST BASIS." In addition, the CTS requirement test on the other containment isolation valves with resilient seals was increased from 92 days to 184 days (6 months). Also, an additional test requirement was added to test all valves with resilient seals within 92 days after opening of the valve.	SR 3.6.3.5	4.6.1.9.3 4.6.1.9.4	II
3.6 L.26	The CTS requirement that the boron concentration of the ice bed be verified once per 9 months was revised to increase the surveillance interval to 18 months.	SR 3.6.12.3	4.6.5.1.b.1	II
3.6 L.27 (M)	The CTS requirements which do not include an Action for the Condition where there is no OPERABLE hydrogen igniter in one containment region are revised by the addition of a new Condition which provides the allowance for a hydrogen igniter to be restored in the affected containment region to OPERABLE status within 7 days or be in MODE 3 within 6 hours. This is a relaxation of the Completion Time requirement of the otherwise applicable LCO 3.0.3.	3.6.9 Actions B and C	3.6.4.3 Actions	III

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.6 CONTAINMENT SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.6 L.28	The CTS requires that the specified testing be performed using a "test" signal. The ITS permits the use of an actual or simulated actuation signal for testing purposes.	SRs 3.6.3.6, 3.6.6.3, 3.6.6.4, 3.6.8.4, 3.6.10.3, 3.6.11.1, 3.6.11.3, and 3.6.17.3 (C)	4.6.3.2, 4.6.2.c, 4.6.5.6.1.a, 4.6.5.6.1.d, 4.6.1.8.d.2, and 4.6.6.2 (C)	V
3.6 L.29	The CTS requirement for continuously monitoring inlet door positions was revised to require the door position to be monitored every 12 hours.	SR 3.6.13.1	4.6.5.3.1.a	II
3.6 L.30	The CTS requirement to verify that each containment purge valve is sealed closed was revised by the addition of an exception to open one purge valve in a penetration flow path while in Condition E of ITS 3.6.3 to perform repairs.	SR 3.6.3.1	4.6.1.9.1	IV, V
3.6 L.31	The CTS allowance for certain containment isolation valves to be opened under administrative control was revised by the addition of an ITS note to the ACTIONS which provides an allowance to open any containment isolation valve required to be closed (except for the large containment purge/exhaust valves) under administrative controls.	3.6.3, Actions Note	4.6.1.1.a and footnote (M) Table 3.6-2(C)	IV
3.6 L.32	The CTS requirement for restoring inoperable valves to OPERABLE status was replaced by the ITS Action which specifies isolating the affected penetration flow path by use of at least one closed and deactivated automatic valve, closed manual valve, or blind flange.	3.6.3, Required Action E.1	3.6.1.9, Action c	IV
3.6 L.33	The CTS Surveillance Requirement that specifies requirements for Type B leak rate testing for penetrations which have been opened after testing was deleted. The ITS does not contain this specific SR but contains the broader requirement that all applicable Type B testing specified by 10 CFR 50, Appendix J, Option A must be met. The CTS requirement duplicates the requirements of 10 CFR 50, Appendix J. Option A section III.D.2 which requires that Type B penetrations be retested following opening.	SR 3.6.1.2	4.6.1.1.c	VIII

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.6 CONTAINMENT SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.6 L.34	The CTS Surveillance Requirement requiring each penetration located outside containment to be verified closed every 31 days was revised to exclude penetrations which are locked, sealed, or otherwise secured in the closed position.	SR 3.6.3.3	4.6.1.1.a	V
3.6 L.35	The CTS Surveillance Requirement for an operability verification for each containment isolation valve prior to returning the valve to service after maintenance, repair or replacement work on the valve or its associated actuator, or control or power circuit was deleted.	None	4.6.3.1	VII
3.6 L.36	The CTS requirement for a channel calibration of the hydrogen recombiner controls was deleted.	None	4.6.4.2.b.1	VII
3.6 L.37	Descriptive information regarding reporting of abnormal degradation discovered during reactor building surveillances was deleted as redundant to regulation.	None	4.6.1.7	VIII
3.6 L.38	The CTS actions require entry into LCO 3.0.3 if more than one equipment hatch or both equipment hatch and personnel access door become inoperable. A note was added to the CTS Actions to allow separate condition entry for each personnel access door or equipment hatch.	3.6.14 Actions	3.6.5.5 Action a	IV

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.7 PLANT SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.7 L.1	Not used.			
3.7 L.2 (C)	The CTS Actions which only provide for a maximum of two SG PORVs being inoperable were revised to address the conditions, if two or more SG PORVs become inoperable. This condition would allow up to 24 hours to return all but one PORV to OPERABLE, instead of immediate entry into LCO 3.0.3.	3.7.4	3.7.1.6	III, IV
3.7 L.3 (C)	The CTS requirement that the SG PORVs be cycled once per 18 months and prior to startup following a refueling shutdown was revised to require the SG PORVs to be cycled once per 18 months.	SR 3.7.4.2	4.7.1.6.b	II
3.7 L.4	Not used.			
3.7 L.5	The CTS requirements which do not allow operation of the steam driven AFW pump with less than two steam supply valves being Operable were revised to permit a limited time, 7 days, for one of the steam supply valves to be inoperable without declaring the turbine driven AFW pump inoperable.	3.7.5 Action A	3.7.1.2	IV
3.7 L.6	Not used.			
3.7 L.7	The CTS Actions for one MSIV inoperable, which require the MSIV to be restored to Operable status within 4 hours were revised to increase the Completion Time to 8 hours.	3.7.2	3.7.1.4	III
3.7 L.8	The CTS requirement for performing a positive pressure test for the control room on an 18 month basis was modified such that the test is performed by one train each 18 months.	(C) SR 3.7.10.4 (M) SR 3.7.9.4	4.7.6.e.3	II
3.7 L.9	The term "positive reactivity changes" was deleted from the CTS Action requirements for Modes 5 & 6 thus reducing the scope of the Actions.	(C) 3.7.10 (M) 3.7.9	3.7.6 Action b	IV

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.7 PLANT SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.7 L.10	The CTS requirement if one ventilation system is inoperable to return it to Operable status within 7 days was revised to allow 30 days to restore the system.	(C) 3.7.11 (M) 3.7.10	3.7.6	III
3.7 L.11	Not used.			
3.7 L.12	The phrase, "positive reactivity changes" was deleted from the CTS Action requirements Modes 5 & 6, reducing the scope of the Actions.	(C) 3.7.11 (M) 3.7.10	3.7.6 Action b	IV
3.7 L.13	The CTS requirement for performing a negative pressure test for the ECCS pump room on an 18 month basis was modified to be performed by one train of ABFVES each 18 months.	(C) SR 3.7.12.4 (M)SR 3.7.11.4	4.7.7	II
3.7 L.14	The CTS Applicability for maintaining 23 feet of water above the top of irradiated fuel assemblies in the spent fuel pool was revised from "whenever irradiated fuel assemblies are in the spent fuel pool" to "during movement of irradiated fuel assemblies in the spent fuel pool". Also, the Actions were changed from "suspending all movement of fuel assemblies and crane operations with loads in the fuel storage areas and restoring the level" to "suspending movement of irradiated fuel in the spent fuel pool" consistent with the new Applicability.	(C) 3.7.14 (M) 3.7.13	3.9.10	I
3.7 L.15	The CTS Applicability which requires one train of Fuel Handling Ventilation Exhaust System to be Operable "whenever irradiated fuel assemblies are in the spent fuel pool" was revised to "during movement of irradiated fuel assemblies in the spent fuel pool". Also, the Actions were changed from "suspending all movement of fuel assemblies and crane operations with loads in the fuel storage areas", to "suspend movement of irradiated fuel in the spent fuel pool" consistent with the new Applicability.	(C) 3.7.13 (M) 3.7.12	3.9.11	I
3.7 L.16	The CTS surveillance requirement for a determination of gross radioactivity in the secondary coolant has been deleted.	(C) SR 3.7.17.1 (M) SR 3.7.16.1	Table 4.7-1	VII

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.7 PLANT SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.7 L.17 (C)	The requirement for performing a negative pressure test on the spent fuel storage area on an 18 month basis is modified to be performed by only one train of FHVES each 18 months.	SR 3.7.13.4	4.9.11.2.d.2	II
3.7 L.18 (C)	The CTS Actions were modified by the addition of a Note which exempts LCO 3.0.4.	3.7.4 Action A	3.7.1.6 Action A	I, VI
3.7 L.19	The CTS requirement to perform surveillance testing on a staggered test basis was revised to a frequency of 31 days.	(C) SR 3.7.10.1 (M) SR 3.7.9.1	4.7.6.b	II
3.7 L.20	The CTS Actions which only allow one MSIV to be inoperable in MODES 2 and 3 were revised to allow one or more MSIVs to be inoperable in MODES 2 and 3.	3.7.2	3.7.1.4	I
3.7 L.21(C)	The CTS Actions in cases when the Actions cannot be met for an inoperable Main Steam Isolation Valve in Mode 1, require that the plant be in Mode 3 within 6 hours and Mode 4 within 12 hours. These Actions are revised to require the plant to be placed in Mode 2 within 6 hours.	3.7.2 Action B	3.7.1.4	IV
3.7 L.22 (M)	The CTS Actions, in Mode 1, that require the plant, in cases when the Actions cannot be met for an inoperable main steam isolation valve, to reduce power to ≤ 5% RTP within 2 hours were revised to require the plant to be placed in Mode 2 within 6 hours.	3.7.2 Action B	3.7.1.4	III
3.7 L.23 (M)	The CTS Actions which currently allow for a 72 hour Completion Time have been combined into one action with a 7 day completion time.	3.7.11	3.7.7 Actions a, b, c.1, and c.2	III
3.7 L.24	CTS requirement which provides for the testing of the auxiliary feedwater pumps on a 92 day staggered basis was revised to eliminate the staggered testing basis and require the AFW pumps to be tested in accordance with the Inservice Testing (IST) program for safety related pumps.	SR 3.7.5.2	4.7.1.2 b.	II

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.7 PLANT SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.7 L.25	The CTS requirement that specifies isolating penetrations with inoperable containment isolation valves within 4 hours was revised to allow 72 hours for a single inoperable main feedwater valve and 8 hours with two inoperable valves in series.	3.7.3	3.6.3	III
3.7 L.26	CTS requirement that each automatic valve be demonstrated Operable by verifying full closure when tested pursuant to Specification was revised to allow the use of an actual or simulated actuation signal for testing purposes.	SR 3.7.2.1	4.7.1.4	V
3.7 L.27	The CTS requirement that the AFW automatic valves be verified to actuate to the correct position and that the AFW pumps start on the specified test signals was revised to allow the use of an "actual or simulated" test signal.	SRs 3.7.5.3 and 3.7.5.4	4.7.1.2.c.1 and 2	V
3.7 L.28	The CTS requirement that each automatic valve be verified to actuate to the correct position and that the CCW pumps start on the specified test signals was revised to allow the use of an "actual or simulated" test signal.	(C) SRs 3.7.7.2 and 3.7.7.3 (M) SRs 3.7.6.2 and 3.7.6.3	4.7.3.b.1 and 2	V
3.7 L.29	The CTS requirements that each automatic valve in the flow path actuate to its correct position upon receipt of an actuation test signal were revised to exclude automatic valves that are locked, sealed or otherwise secured in position from this verification.	(C) SRs 3.7.5.3, 3.7.7.2, and 3.7.8.2 (M) SRs 3.7.5.3, 3.7.6.2, and 3.7.7.2	4.7.1.2.1.c.1, 4.7.3.b.1, and 4.7.4.b.1	V
3.7 L.30	The CTS requirement that each automatic valve be verified to actuate to the correct position and that the NSWS pumps start on the specified test signals was revised to allow the use of an "actual or simulated" test signal.	(C) SRs 3.7.8.2 and 3.7.8.3 (M) SRs 3.7.7.2 and 3.7.7.3	4.7.4.b.1 and 2	V

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.7 PLANT SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.7 L.31 (M)	The CTS requirement to use a simulated actuation test signal during testing was revised to allow the use of an actual, as well as a simulated test signal.	SR 3.7.9.3	4.7.6.e.2	V

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.8 ELECTRICAL POWER SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.8 L.1	The CTS requirement for the specified DG testing be performed on a STAGGERED TEST BASIS was deleted from the corresponding ITS surveillance requirements.	3.8.1 and 3.8.3 SRs	4.8.1.1.2.a	II
3.8 L.2	The CTS action requirement for the performance of surveillances 4.8.1.1.2.a.4 and 4.8.1.1.2.a.5 for the Operable DG if the other DG is inoperable have been relaxed by deleting the requirement to perform the 1 hour load test of 4.8.1.1.2.a.5.	3.8.1 Required Action B.3.1	3.8.1.1 Action d	IV
3.8 L.3	The CTS Action requirement to verify redundant equipment OPERABLE within 2 hours after discovery of an inoperable DG was revised to require this verification within 4 hours.	3.8.1 Required Action B.2	3.8.1.1 Action c	III
3.8 L.4	Not used.			
3.8 L.5	The CTS requirement for testing the DG load rejection capability of a load of 576 kw, while maintaining voltage at 4160 VAC (± 420 VAC) and frequency at 60 Hz (± 1.2 Hz) was revised to allow a frequency of ≤ 63 Hz.	SR 3.8.1.9	(C) 4.8.1.1.2.g 2) (M) 4.8.1.1.2.e.2)	V
3.8 L.6	An new action requirement is added to the CTS ac sources specification in the event the quantity of fuel oil for the DG is less than required. By the definition of Operability, CTS would require immediately declaring the associated DG inoperable. The new ITS Action allows an additional period of time (48 hours) to resupply the fuel oil before declaring the associated DG inoperable.	3.8.3 Action A	3.8.1.1 Actions	III
3.8 L.7	Not used.			
3.8 L.8	The CTS requirements for the total particulates allowed in the stored fuel oil is revised to allow the fuel oil to exceed the total particulates limit for 7 days before declaring the associated DG inoperable. By the definition of Operability, CTS would require immediately declaring the associated DG inoperable.	3.8.3 Action B	4.8.1.1.2	III
3.8 L.9	Not used.			

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.8 ELECTRICAL POWER SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.8 L.10	The CTS requirement that all diesel fuel oil properties must be within limits for new fuel oil is revised to allow oil properties to be outside required limits of the Fuel Oil Testing Program for 30 days before the DGs must be declared inoperable. By the definition of Operability, CTS would require immediately declaring the associated DG inoperable.	3.8.3 Action C (M) 3.8.3 Action D (C)	(C) 4.8.1.1.2.e.2 (M) 4.8.1.1.2.c.2	III
3.8 L.11(M)	The CTS requirement to verify, every 18 months during shutdown, with all DG air start receivers pressurized to 220 psig or less and the compressors secured that the DG will start twice from ambient conditions and accelerate to at least 57 Hz in 11 seconds or less. This surveillance was replaced with the ITS requirement to verify that the air start receiver pressure is ≥210 psig every 31 days.	SR 3.8.3.3	4.8.1.1.2.e.15	Unique See Safety Evaluation Section III.G.14
3.8 L.12 (M)	The CTS surveillance requirement which tests the DG capability to reject a load of 4000 kW without tripping was revised to require a load of at least 3600 kW but not more than 4000 kW.	SR 3.8.1.10	4.8.1.1.2 e.3	V
3.8 L.13	The CTS was revised by the addition of an allowance to perform a modified performance discharge test instead of the performance discharge test, when verifying battery capacity with less than 80% of manufacturer's rating.	(C) SR 3.8.4.9	(C) 4.8.2.1.1.e, 4.8.2.1.1.f, and 4.8.1.1.4.d	V
		(M) SR 3.8.4.8	(M) 4.8.2.1.2.e and 4.8.2.1.2.f	
3.8 L.14	Not used.			
3.8 L.15 (C)	The CTS requirement to verify, on a weekly basis, no indication of damage from electrolyte leakage for the DC channel batteries was deleted.	SR 3.8.6.1	4.8.2.1.1.a.3	VII
3.8 L.16	The CTS time allowed to restore Category A and B battery parameters to within limits was increased from 7 days to 31 days.	3.8.6 Required Action A.3	Table 4.8-3 Notes (1) and (2)	III

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.8 ELECTRICAL POWER SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.8 L.17 (C)	Following a battery discharge to a voltage of 110 VDC or an overcharge above 150 volts, the CTS require verifying within 7 days that there is no visible corrosion at either terminals or connectors and that the average electrolyte temperature of six connected cells is within limits. This surveillance is deleted for the DG batteries.	SR 3.8.4.1 SR 3.8.6.2	4.8.1.1.4.b	VII
3.8 L.18	The CTS time allowed to demonstrate the OPERABILITY of the remaining OPERABLE DG, when one offsite circuit and one DG are inoperable, was increased from 8 hours to 24 hours.	3.8.1 Actions A, B, and D	3.8.1.1 Action b	III
3.8 L.19 (M)	The CTS requirements were revised by the addition of an action requirement which allows the DG starting air supply to decrease below the required capacity of 210 psig for up to 48 hours.	3.8.3 Action D	4.8.1.1.2.e.15	Unique See Safety Evaluation Section III.G.14
3.8 L.20	The CTS requirement for the simultaneous start of both DGs during shutdown was revised to delete the requirement to perform this surveillance during shutdown.	SR 3.8.1.20	4.8.1.1.2.h (C) 4.8.1.1.2.f (M)	II
3.8 L.21	The CTS shutdown surveillance requirement for the required DG and offsite circuit was revised to delete surveillances that demonstrate capabilities that not required in Modes 5 and 6, or that should not be performed in these modes. A note was also added to exempt performance of certain surveillances for the DG and offsite AC sources being used to satisfy the operability requirements of ITS LCO 3.8.2.	SR 3.8.2.1 and SR 3.8.2.1 Note	4.8.1.2	VII V
3.8 L.22	The CTS surveillance requirement for the DC Sources - Shutdown was revised by the addition of an allowance which exempts performing certain surveillances on the DC sources required to be operable to satisfy ITS LCO 3.8.5.	SR 3.8.5.1 Note	4.8.2.2.2	VII

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.8 ELECTRICAL POWER SYSTEMS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.8 L.23	The CTS requirement that the specified testing be performed using a "simulated" signal was revised to allow the use of an actual or simulated actuation signal for testing purposes.	SR 3.8.1.11, 3.8.1.12, 3.8.1.13, 3.8.1.17, and 3.8.1.19	(C) 4.8.1.1.2.g.4, 5, 6, 10 (M) 4.8.1.1.2.e.4, e.5, e.6, g.11	V
3.8 L.24	Not used.			
3.8 L.25	The CTS requirement that each DG is aligned to provide standby power to the associated emergency buses once per 31 days was deleted because it is an implicit requirement stemming from the definition of operability for the DGs.	3.8.1	4.8.1.1.2.a.6	VII
3.8 L.26	The CTS requirement for both DGs be started simultaneously after any modifications which could affect DG interdependence is deleted.	3.8.1	(C) 4.8.1.1.2.h (M) 4.8.1.1.2.f	VIII
3.8 L.27	CTS 4.8.2.1.1.f requires a performance discharge test of the DC batteries on an 18 month frequency when the batteries have reached 85% of their service life. Corresponding ITS SR 3.8.4.9 requires an 18 month frequency only when the capacity of the battery has dropped below 100% of the manufacturers rating. IN addition, ITS SR 3.8.4.9 specifies a 24 month frequency for batteries which have reached 85% of service life, but retain 100% of the manufacturers rated capacity. This change is acceptable based on the fact that the battery retains full rated capacity and is consistent with the recommendations of IEEE-450 for lead acid storage batteries.	SR 3.8.4.9	4.8.2.1.1.f	II
3.8 L.28	The CTS requirements for battery cell electrolyte level were revised by the addition of an allowance for the electrolyte level to temporarily increase above the maximum specified level during equalizing charges provided it does not overflow.	Table 3.8.6-1	Table 4.3-8	VI

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.9 REFUELING OPERATIONS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.9 L.1	The CTS Surveillance Requirement to determine the more restrictive reactivity condition of either K_{eff} or boron concentration prior to removing or unbolting the reactor vessel head or withdrawal of any full-length control rod in excess of 3 feet from its fully inserted position within the reactor vessel, was deleted.	SR 3.9.1.1	4.9.1.1	Unique
3.9 L.2 (M)	The CTS requirement to verify "closed" boron dilution vales under administrative control at least once per 72 hours and once per 12 hours was revised to require the valves be verified "secured in the closed position" once per 31 days.	3.9.2	4.9.1.3	II
3.9 L.3	The CTS requirement for one Source Range Neutron Flux Monitor to have audible indication ("pulse counter") in the control room and containment, was deleted.	3.9.2	3.9.2	IV
3.9 L.4	Not used.			
3.9 L.5	The CTS requirement for each containment building penetration to be in its required condition within the specified hours prior to the start of Core Alterations was deleted.	3.9.3	4.9.4.1	VII
3.9 L.6	The CTS Note that allows the RHR loop to be removed from operation for up to 1 hour per 8 hour period during the performance of Core Alterations in the vicinity of the hot legs was revised to allow the RHR loop to be removed from operation for up to 1 hour per 8 hour period provided no operations are permitted that would cause reduction of the Reactor Coolant System boron concentration.	3.9.4 (C) 3.9.5 (M)	3.9.8.1	VI
3.9 L.7	The CTS Surveillance Requirement to determine the water level in the refueling cavity within 2 hours prior to the start of moving fuel assemblies or control rods was deleted.	SR 3.9.6.1 (C) SR 3.9.7.1 (M)	4.9.9	VII
3.9 L.8 (C)	The CTS requirement for each BDMS train to be subjected to an Analog Channel Operational Test within 8 hours prior to the start of core alterations was deleted.	SR 3.9.2.2	4.9.2.1.1.b	VII

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 3.9 REFUELING OPERATIONS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
3.9 L.9 (M)	The CTS requirement that the source range neutron flux monitors to be subjected to an ACOT 8 hours prior to core alterations and every 7 days thereafter was deleted.	3.9.3	4.9.2.b and c	VII
3.9 L.10 (C)	A note was added to the CTS to permit the automatic actuation function of the BDMS to be blocked during core reloading until two assemblies have been loaded into the core.	3.9.2	3.9.2.1	Unique See Safety Evaluation Section III.G.16
3.9 L.11	The CTS was revised to add "or equivalent" to the list of acceptable containment penetration isolation devices.	3.9.4.c (M) 3.9.3.c (C)	3.9.4.c	VI

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 4.0 DESIGN FEATURES

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
	There are no "Less Restrictive Changes" in this section.			

(C) Catawba specific
(M) McGuire specific

Categories:

I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirement
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 5.0 ADMINISTRATIVE CONTROLS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
5.0 L.1	The CTS requirement for the shift crew composition to be one less than the minimum requirement for two hours is revised to delete the portion of this requirement that does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.	5.2.2.c	Table 6.2-1	VI
5.0 L.2	The CTS Frequency requirement for Inservice Testing is revised to allow the provisions of 4.0.3 to be applicable to inservice testing activities. This requirement will allow 24 hours or up to the limit of the Frequency, whichever is less, to perform Inservice Testing if discovered that the testing requirements were not performed prior to declaring the component inoperable.	5.5.8.c	4.0.5	II
5.0 L.3	The CTS requirement that a retraining and replacement training program for the unit staff shall meet or exceed the requirements and recommendations of ANSI N18.1-1971 and 10 CFR Part 55 is revised to delete the requirements of 10 CFR 55. It is not necessary to duplicate the regulations within the TS.	5.3.1	6.4.1	VIII
5.0 L.4	The CTS requirements for the minimum shift crew composition and functions were revised to delete those requirements contained in 10 CFR 50.54. It is not necessary to duplicate regulations in the TS.	5.2.2	6.2.2.a, 6.2.2.d, and Table 6.2-1	VIII
5.0 L.5	The CTS requirement, which specifies that the NRC shall be notified and a report submitted pursuant to the requirements of 10 CFR 50.73 is deleted. This requirement currently exists in 10 CFR 50.73.	5.6	6.6.1.a	VIII
5.0 L.6	The CTS requirement to submit a yearly report to the NRC which contains the results of specific activity analyses in which the primary coolant exceeded the limits of the RCS Specific Activity Specification was deleted since it serves only to report LCO action entries.	5.6	6.9.1.5.b	VI

(C) Catawba specific
(M) McGuire specific

Categories:
I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirements
VIII. Deletion of Requirements Redundant to Regulations

TABLE L - LESS RESTRICTIVE CHANGES
SECTION 5.0 ADMINISTRATIVE CONTROLS

DISCUSSION OF CHANGE	SUMMARY OF CHANGE	ITS REQUIREMENTS	CTS REQUIREMENTS	CATEGORY
5.0 L.7	The CTS requirements for the "Radiation Protection Program," procedures to be prepared for personnel radiation protection consistent with the requirements of 10 CFR 20 are deleted. These requirements exist in 10 CFR 20.1101 and are not necessary for inclusion within the TS.	5.5	6.11	VIII
5.0 L.8	The requirement in the CTS to conduct inservice inspection and testing in accordance with ASME Section XI has been deleted. This requirement currently exists in 10 CFR 50.55(a).	5.5	4.0.5.a and 4.0.5.d	VIII
5.0 L.9	The CTS requirement for a Radiation Protection Technician onsite when fuel is in the reactor was revised to allow the Radiation Protection Technician position to be vacant for up to 2 hours in the case of an unplanned absence.	5.2.2.d	6.2.2.c	VI
5.0 L.10	CTS requirement that diesel generator fuel oil particulate contamination be verified in accordance with ASTM-D2276, Method A was revised to require that particulate contamination be verified based on ASTM-D2276, Method A. This change allows a less restrictive surveillance test method to be used.	5.5.13.c	4.8.1.1.2.d (M) 4.8.1.1.2.f (C)	Unique See Safety Evaluation Section III G.17

(C) Catawba specific
(M) McGuire specific

Categories:

I. Relaxation of Applicability
II. Relation of Surveillance Frequency
III. Relaxation of Completion Time
IV. Relaxation of Required Actions
V. Relaxation of Surveillance Requirement
VI. Relaxation of LCO and Administrative Controls
VII. Deletion of Surveillance Requirements
VIII. Deletion of Requirements Redundant to Regulations

TABLE LA - REMOVAL OF INFORMATION FROM THE CTS
SECTION 1.0 USE AND APPLICATION

DISCUSSION OF CHANGE	CTS REQUIREMENT	SUMMARY OF CHANGE	DESTINATION DOCUMENT	CONTROL PROCESS	CHANGE TYPE
1.0 LA.1	Table 1.2	The reactivity condition limitation for the REFUELING MODE of operation.	COLR	ITS 5.6.5	1
1.0 LA.2	1.0	The CTS definitions for MEMBERS OF THE PUBLIC, PURGE-PURGING, SITE BOUNDARY, SOURCE CHECK, UNRESTRICTED AREA, VENTILATION EXHAUST TREATMENT SYSTEM, VENTING, and WASTE GAS HOLDUP SYSTEM.	SLC	10CFR50.59	2
1.0 LA.3	1.23	The CTS definition for PROCESS CONTROL PROGRAM (PCP).	SLC	10CFR 50.59	3

(C) Catawba specific
(M) McGuire specific

LA Change Types:
1. Details of System Design
2. Descriptions of System Operation
3. Procedural Details for Meeting TS Requirements

TABLE LA - REMOVAL OF INFORMATION FROM THE CTS
SECTION 2.0 SAFETY LIMITS

DISCUSSION OF CHANGE	CTS REQUIREMENT	SUMMARY OF CHANGE	DESTINATION DOCUMENT	CONTROL PROCESS	CHANGE TYPE
		There are no "LA" changes in this section.			

(C) Catawba specific
(M) McGuire specific

LA Change Types:
1. Details of System Design
2. Descriptions of System Operation
3. Procedural Details for Meeting TS Requirements

TABLE LA - REMOVAL OF INFORMATION FROM THE CTS
SECTION 3.0 LCO AND SR APPLICABILITY

DISCUSSION OF CHANGE	CTS REQUIREMENT	SUMMARY OF CHANGE	DESTINATION DOCUMENT	CONTROL PROCESS	CHANGE TYPE
		There were no "LA" changes in this section.			

(C) Catawba specific
(M) McGuire specific

LA Change Types:
1. Details of System Design
2. Descriptions of System Operation
3. Procedural Details for Meeting TS Requirements

TABLE LA - REMOVAL OF INFORMATION FROM THE CTS
SECTION 3.1 REACTIVITY CONTROL SYSTEMS

DISCUSSION OF CHANGE	CTS REQUIREMENT	SUMMARY OF CHANGE	DESTINATION DOCUMENT	CONTROL PROCESS	CHANGE TYPE
3.1 LA.1	3.1.1.1	The details from the CTS Actions which provide instructions on restoring SDM (shutdown margin) with specific values of boron flow rate and boron concentration.	3.1.1 Bases	Bases control program	2
3.1 LA.2	4.1.1.1.1.d, 4.1.1.1.1.e, 4.1.1.1.2, and 4.1.1.2.b	The CTS Surveillance Requirement list of factors to be considered when determining SDM.	3.1.1 Bases	Bases control program	3
3.1 LA.3	3.1.1.1 and 3.1.1.2.	Specific values for SDM.	COLR	5.6.5	1
3.1 LA.4	3.1.3.1, Action a	The detailed Action information on rod inoperability as a result of being untrippable.	3.1.4 Bases	Bases control program	3
3.1 LA.5	3.1.3.1, Action c.3.a and Table 3.1-1	The CTS list of accident analyses requiring reevaluation if a trippable rod is misaligned and continued operation is desired.	UFSAR	10CFR50.59	3
3.1 LA.6	3.1.3.2	The descriptive information about the capability of control rod position indication.	3.1.7 Bases	Bases control program.	1
3.1 LA.7		Not used.			
3.1 LA.8		Not used.			
3.1 LA.9		Not used.			
3.1 LA.10	3.1.3.1, Action c	The action requirement details describing how to restore rod alignment limits.	3.1.4 Bases	Bases control program	3

(C) Catawba specific
(M) McGuire specific

LA Change Types:
1. Details of System Design
2. Descriptions of System Operation
3. Procedural Details for Meeting TS Requirements

TABLE LA - REMOVAL OF INFORMATION FROM THE CTS
SECTION 3.2 POWER DISTRIBUTION

DISCUSSION OF CHANGE	CTS REQUIREMENT	SUMMARY OF CHANGE	DESTINATION DOCUMENT	CONTROL PROCESS	CHANGE TYPE
3.2 LA.1	3.2.2	The formulas in the CTS for determining the values of $F_Q^M(X,Y,Z)$, P, F_Q^{RTP}, and K(Z).	3.2.1 Bases	Bases control program	3
3.2 LA.2	3.2.2, Action c and 4.2.2.2.c	The CTS references to trip setpoint constants and instrument scales.	3.2.1 Bases	Bases control program	1
3.2 LA.3	4.2.2.2.e 4.2.2.2.d	The CTS exceptions for various core planes and core regions used when determining $F_Q^M(X,Y,Z)$.	3.2.1 Bases	Bases control program	3
3.2 LA.4	4.2.2.3	The CTS requirements for the measured value of $F_Q(X,Y,Z)$ to be increased by 3% to account for manufacturing tolerances and 5% for measurement uncertainties.	COLR	5.6.5	3
3.2 LA.5	4.2.2.2 4.2.3.2	The descriptive information for how the peaking factor surveillances are to be performed.	3.2.1 Bases	Bases control program	3
3.2 LA.6	3.2.3	Definitions of $F^M_{\Delta H}(X,Y)$ and $F^L_{\Delta H}(X,Y)^{LCO}$.	3.2.2 Bases	Bases control program	1
3.2 LA.7	3.2.3	The CTS references to trip setpoint constants and instrument scales.	3.2.2 Bases	Bases control program	1
3.2 LA.8	4.2.4.2	The CTS information regarding how the incore detectors are used for determining QPTR.	SR 3.2.4.2 Bases	Bases control program	2

(C) Catawba specific
(M) McGuire specific

LA Change Types:
1. Details of System Design
2. Descriptions of System Operation
3. Procedural Details for M eting TS Requirements

TABLE LA - REMOVAL OF INFORMATION FROM THE CTS
SECTION 3.3 INSTRUMENTATION

DISCUSSION OF CHANGE	CTS REQUIREMENT	SUMMARY OF CHANGE	DESTINATION DOCUMENT	CONTROL PROCESS	CHANGE TYPE
3.3 LA.1	Table 3.3-2	The CTS Reactor Trip System Response Times were moved to the UFSAR.	UFSAR	10CFR 50.59	3
3.3 LA.2	Table 3.3.2 footnote	The CTS detail in the footnote to Table 3.3-2 for response time testing of neutron flux detectors was moved to the ITS Bases.	3.3.1 Bases	Bases control program	3
3.3 LA.3	Table 4.3-1, Note 5	The CTS statement regarding detector plateaus was moved to the ITS Bases.	SR 3.3.1.11 Bases	Bases control program	3
3.3 LA.4	Table 4.3-1, Note 9	The specific details in CTS SR to ensure (by observation of the permissive annunciator window), permissives P-6 and P-10 are in their required state was moved to the ITS Bases.	SR 3.3.1.8 Bases	Bases control program	3
3.3 LA.5	Table 3.3-1, Action 8	The specific CTS requirement that details how to ensure (by observation of the permissive status light), permissives are in their required state has been moved to the ITS Bases.	3.3.1 Bases	Bases control program	3
3.3 LA.6	(C) Table 4.3-1, Notes 11, 14, 15, and 16 (M) Table 4.3-1, Notes 11, 12, 13, and 14	The CTS 3.3.1 Notes containing procedural detail for testing the Manual Reactor Trip TADOT, Reactor Trip Breaker TADOT, and the Reactor Trip Bypass Breaker TADOT were moved to the ITS Bases.	SR 3.3.1.4 and 3.3.1.14. Bases	Bases control program	3
3.3 LA.7	2.2.1	The descriptive details in CTS actions for limiting safety system settings were moved to the ITS Bases.	3.3.1 Bases	Bases control program	3
3.3 LA.8	Table 2.2-1	Detailed information about how the trip setpoints and allowable values for pressurizer water level and RCS flow are scaled was moved to the ITS Bases.	3.3.1 Bases	Bases control program	3
3.3 LA.9 (M)	Table 3.4-1, Note 15	CTS, details on the calibration of the Overtemperature, overpressure, and RCS loop delta T are moved to the Bases of ITS.	SR 3.3.1.12 Bases	Bases control program	3

(C) Catawba specific
(M) McGuire Specific

LA Change Types:
1. Details of System Design
2. Descriptions of System Operation
3. Procedural Details for Meeting TS Requirements

TABLE LA - REMOVAL OF INFORMATION FROM THE CTS
SECTION 3.3 INSTRUMENTATION

DISCUSSION OF CHANGE	CTS REQUIREMENT	SUMMARY OF CHANGE	DESTINATION DOCUMENT	CONTROL PROCESS	CHANGE TYPE
3.3 LA.10 (M)	Table 4.3-2, Note 9	CTS details for performing the surveillance on the high flux at shutdown alarm are moved to the ITS Bases.	SR 3.3.1.7 Bases	Bases control program	3
3.3 LA.11	Table 2.2-1	The Overtemperature ΔT and Overpower ΔT limit equation compensation variable definitions in CTS were moved to the UFSAR.	UFSAR	10 CFR 50.59	1
3.3 LA.12	Table 3.3-5	The CTS Engineered Safety Features Response Time testing, is moved to the UFSAR.	UFSAR	10 CFR 50.59	3
3.3 LA.13	3.3.2 Actions	The descriptive details in the CTS Actions regarding the relationship between Trip Setpoints, Allowable Value, and OPERABILITY have been incorporated into the ITS Bases.	3.3.2 Bases	Bases control program	3
3.3 LA.14	Tables 3.3-3, 3.3-4, and 4.3-2	The CTS design description of Function 1, Safety Injection, including all the functions initiated by a safety injection signal (e.g., Reactor Trip, Feedwater Isolation, etc.) was moved to the ITS Bases.	3.3.2 Bases	Bases control program	1
3.3 LA.15	Table 3.3-3	The CTS AFW design description regarding which initiating signal starts the motor or steam driven pumps was moved to the Bases for ITS 3.3.2.	3.3.2 Bases	Bases control program	1
3.3 LA.16	Table 3.3-4	The CTS design descriptions of the Feedwater Isolation and Auxiliary Feedwater (C) for the SG Level-High High (P-14) and Auxiliary Feedwater for the SG Level-Low Low function (C) trip setpoints and allowable values as "narrow range instrument span," were moved to the ITS Bases .	3.3.2 Bases	Bases control program	1
3.3 LA.17		Not used.			
3.3 LA.18		Not used.			
3.3 LA.19	4.6.4.1	The specific information located in the CTS SR which requires the Channel Calibration to be performed using a sample gas containing hydrogen and the specific calibration points is moved to the ITS Bases.	3.3.3 Bases	Bases control program	3
3.3 LA.20		Not used.			

(C) Catawba specific
(M) McGuire Specific

LA Change Types:
1. Details of System Design
2. Descriptions of System Operation
3. Procedural Details for Meeting TS Requirements

TABLE LA - REMOVAL OF INFORMATION FROM THE CTS
SECTION 3.3 INSTRUMENTATION

DISCUSSION OF CHANGE	CTS REQUIREMENT	SUMMARY OF CHANGE	DESTINATION DOCUMENT	CONTROL PROCESS	CHANGE TYPE
3.3 LA.21 (C)	3.3.3.11	The design description of the Boron Dilution Mitigation System design (Alarm Setpoints at 4 times the steady-state count rate) was moved to the ITS Bases.	3.3.9 Bases	Bases control program	1
3.3 LA.22 (C)	3.3.3.11	The design description of the unborated water source valve was moved to the ITS Bases.	3.3.9 Bases	Bases control program	1
3.3 LA.23 (C)	3.3.3.11	The system description of the Source Range Neutron Flux Monitors operating with Alarm Setpoints at 0.5 decade above steady-state count rate was moved to the ITS Bases.	3.3.9 Bases	Bases control program	1
3.3 LA.24		Not used.			
3.3 LA.25	Table 3.3-3, Action 20	The specific requirement in the CTS that describes how to ensure (by observation of the permissive status light), permissives are in their required state is moved to the ITS Bases.	3.3.2 Bases	Bases control program	3
3.3 LA.26 (C)	Table 3.3-10 and 4.3-7	The CTS lists of accident monitoring variables which are not category 1 or type A are moved to the UFSAR.	UFSAR	10 CFR 50.59	3

(C) Catawba specific
(M) McGuire Specific

LA Change Types:
1. Details of System Design
2. Descriptions of System Operation
3. Procedural Details for Meeting TS Requirements

TABLE LA - REMOVAL OF INFORMATION FROM THE CTS
SECTION 3.4 REACTOR COOLANT SYSTEM

DISCUSSION OF CHANGE	CTS REQUIREMENT	SUMMARY OF CHANGE	DESTINATION DOCUMENT	CONTROL PROCESS	CHANGE TYPE
3.4 LA.1 (M)	3.2.5	The detail for determining the RCS DNB limits in CTS has been moved to the ITS Bases.	3.4.1	Bases control program	3
3.4 LA.2	3.4.9.1	The procedural detail regarding how the RCS is determined acceptable for continued operation "perform an engineering evaluation to determine the effects of the out-of-limit condition on the structural integrity of the Reactor Coolant System" has been removed from the Action and placed in the ITS bases.	3.4.3 Bases	Bases control program	3
3.4 LA.3	4.4.9.1.2	The CTS SR and Table of surveillance schedule information used for the removal and evaluation of the properties of the reactor vessel material surveillance specimens has been relocated to the UFSAR.	UFSAR	10 CFR 50.59	3
3.4 LA.4	3.4.1.2	The description of what constitutes an OPERABLE RCS and RHR loop was moved to the ITS Bases.	3.4.5 Bases	Bases control program	1
3.4 LA.5	3.4.1.3	The descriptive detail of what constitutes an OPERABLE RCS and RCS subsystem including the status of individual components and their support requirements, was moved to the ITS Bases.	3.4.6 Bases	Bases control program	1
3.4 LA.6	4.4.1.1, 4.4.1.2.2, 4.4.1.3.3, 4.4.1.4.1.2, and 4.4.1.4.2	The description of an operable loop "circulating reactor coolant" used in the CTS SRs to determine operability was moved to the applicable ITS bases.	3.4.4, 3.4.5, 3.4.6, 3.4.7, and 3.4.8 bases	Bases control program	3
3.4 LA.7	4.4.3.2	The details describing how the testing of the pressurizer heaters is to be performed has been moved to the ITS Bases.	3.4.9 Bases	Bases control program	3
3.4 LA.8		Not used.			

(C) Catawba specific
(M) McGuire Specific

LA Change Types:
1. Details of System Design
2. Descriptions of System Operation
3. Procedural Details for Meeting TS Requirements

TABLE LA - REMOVAL OF INFORMATION FROM THE CTS
SECTION 3.4 REACTOR COOLANT SYSTEM

DISCUSSION OF CHANGE	CTS REQUIREMENT	SUMMARY OF CHANGE	DESTINATION DOCUMENT	CONTROL PROCESS	CHANGE TYPE
3.4 LA.9	(C) 4.1.2.3.2, 4.1.2.4.2, 4.5.3.2 (M) 3.4.9.3, 4.1.2.3.2, 4.1.2.4.2, 4.5.3.2	The details regarding how the charging and safety injection pumps are rendered incapable of injection have been moved to the ITS Bases.	3.4.12 Bases	Bases control program	3
3.4 LA.10		Not used.			
3.4 LA.11	Table 3.4-1	The list of RCS PIVs has been moved from the Technical Specifications to the UFSAR.	UFSAR	10 CFR 50.59	3
3.4 LA.12	Table 4.4-4	The statements which contain detailed descriptions of the required testing have been moved to the ITS Bases.	3.4.16 Bases	Bases control program	3
3.4 LA.13	3.10.4.b	The CTS requirement for the reactor trip setpoints on the intermediate and power range channels to be set less than or equal to 25% of RATED THERMAL POWER has been removed based on the system design described in the UFSAR and the fact that ITS 3.3.1 provides the applicable LCO and SR requirements regarding the setpoints and allowable values for the intermediate range neutron flux channels.	UFSAR	10 CFR 50.59	1
3.4 LA.14	3.4.9.1	The CTS specifies the heatup and cooldown limitations for the reactor coolant system. The LCO statement indicates that this limit is not applicable to the pressurizer. This clarification is not necessary for inclusion within the LCO and is moved to the ITS Bases.	3.4.3 Bases	Bases control program	3
3.4 LA.15 (C)	3.4.9.3.a	The details in the CTS footnote regarding how the RCS temperature measurement is obtained when using the PORVs have been moved to the ITS Bases.	3.4.12 Bases	Bases control program	3

(C) Catawba specific
(M) McGuire Specific

LA Change Types:
1. Details of System Design
2. Descriptions of System Operation
3. Procedural Details for Meeting TS Requirements

TABLE LA - REMOVAL OF INFORMATION FROM THE CTS
SECTION 3.5 EMERGENCY CORE COOLING

DISCUSSION OF CHANGE	CTS REQUIREMENT	SUMMARY OF CHANGE	DESTINATION DOCUMENT	CONTROL PROCESS	CHANGE TYPE
3.5 LA.1 (C)	4.5.1.1.c	The detail in the CTS surveillance which identifies specific valve operators.	SR 3.5.1.5 Bases	Bases control program	1
3.5 LA.2	3.5.2, 3.5.3	The detail of what individual subsystems constitutes an OPERABLE ECCS subsystem.	3.5.2 Bases and 3.5.3 Bases	Bases Control Program	1
3.5 LA.3		Not used.			
3.5 LA.4	4.5.2.b.1	The CTS Surveillance details regarding the method used to assure that the ECCS piping is full of water.	SR 3.5.2.3 Bases	Bases control program	3
3.5 LA.5	4.5.2.f	Details of pump pressure limits for inservice testing.	Inservice Testing Program	10CFR50.55a	1
3.5 LA.6	3.5.3, Action b	The CTS Action requirement for an alternate heat removal method if an RHR subsystem cannot be restored.	3.5.3 Bases	Bases control program	3
3.5 LA.7	4.5.2.e	The information in the CTS Surveillance describing the performance of the surveillance as "during shutdown."	SR 3.5.2.5 Bases and SR 3.5.2.6 Bases	Bases control program	2
3.5 LA.8	4.5.2.c	The CTS requirement for visual inspection of the containment, to assure that no loose debris is present which could cause restrictions to the containment sump suction lines.	SLC	10CFR50.59	3

(C) Catawba specific
(M) McGuire specific

LA Change Types:
1. Details of System Design
2. Descriptions of System Operation
3. Procedural Details for Meeting TS Requirements

TABLE LA - REMOVAL OF INFORMATION FROM THE CTS
SECTION 3.6 CONTAINMENT SYSTEMS

DISCUSSION OF CHANGE	CTS REQUIREMENT	SUMMARY OF CHANGE	DESTINATION DOCUMENT	CONTROL PROCESS	CHANGE TYPE
3.6 LA.1	4.6.1.2.c and 4.6.1.6	CTS Surveillance Requirement details and exemptions for meeting the leak rate testing requirements stated in 10 CFR 50, Appendix J, Option B for Type A testing.	CLRTP	10CFR50, Appendix J	3
3.6 LA.2	3.6.1.3.a	The descriptive information in the CTS LCO, regarding OPERABILITY of the air locks.	3.6.2 Bases	Bases Control Program	1
3.6 LA.3	4.6.1.3.a and b	CTS Surveillance Requirement details describing the airlock testing required by 10 CFR 50, Appendix J.	3.6.2 Bases	Bases Control Program	3
3.6 LA.4	4.6.1.3.d	CTS Surveillance Requirement details concerning the testing of the pneumatic seal system for the personnel air lock doors.	3.6.2 Bases	Bases Control Program	3
3.6 LA.5		Not used.			
3.6 LA.6	4.6.3.2	The CTS details regarding which test signal (Phase A, Phase B, or Safety Injection) should be applied to isolation valve testing.	3.6.3 Bases	Bases Control Program	3
3.6 LA.7 (C)	Table 3.6-2	The CTS list of containment isolation valves, their function, and isolation times.	UFSAR	10CFR50.59	1
3.6 LA.8	4.6.1.5.1 and 4.6.1.5.2	CTS descriptive information on measurement locations and on how the average containment temperature is determined.	3.6.5 Bases	Bases Control Program	3
3.6 LA.9	3.6.2 and 4.6.2	Descriptive information regarding system operability and independence.	3.6.6 Bases	Bases Control Program	1
3.6 LA.10	3.6.4.2	Descriptive system information regarding hydrogen recombiner independence and operability.	3.6.7 Bases	Bases Control Program	1
3.6 LA.11		Not used.			

(C) Catawba specific
(M) McGuire specific

LA Change Types:
1. Details of System Design
2. Descriptions of System Operation
3. Procedural Details for Meeting TS Requirements

TABLE LA - REMOVAL OF INFORMATION FROM THE CTS
SECTION 3.6 CONTAINMENT SYSTEMS

DISCUSSION OF CHANGE	CTS REQUIREMENT	SUMMARY OF CHANGE	DESTINATION DOCUMENT	CONTROL PROCESS	CHANGE TYPE
3.6 LA.12	4.6.5.6.1.a and d	The test signal for starting the air return and hydrogen skimmer fans.	3.6.8 and 3.6.11 Bases	Bases Control Program	3
3.6 LA.13	4.6.1.8 and 4.6.5.6.1	Descriptive information regarding system operation in the Annulus Ventilation System and Air Return System in the specified surveillances.	3.6.10 and 3.6.11 Bases	Bases Control Program	2
3.6 LA.14	3.6.5.1 and 4.6.5.1	Descriptive information regarding system design and design limits in the Ice Bed LCO and surveillances.	3.6.12 Bases	Bases Control Program	1
3.6 LA.15	4.6.5.3.1 and 4.6.5.3.2	Descriptive information regarding system operability in the Ice Condenser Doors surveillances.	3.6.13 Bases	Bases Control Program	1
3.6 LA.16	4.6.1.7	Descriptive information regarding the structure integrity of the reactor building.	3.6.16 Bases	Bases Control Program	3
3.6 LA.17		Not used.			
3.6 LA.18	4.6.2.c, 4.6.5.3.1.b, 4.6.5.9, and 4.6.5.7	The statement in CTS Surveillance Requirements which describes performance of the surveillance as "during shutdown."	3.6.6, 3.6.13, 3.6.14, and 3.6.15 Bases	Bases Control Program	3
3.6 LA.19	4.6.1.9.3 and 4.6.1.9.4	Descriptive information regarding the leakage limits for resilient material valves.	3.6.3 Bases.	Bases Control Program	1
3.6 LA.20		Not used.			
3.6 LA.21 (M)	3.6.1.9.b,	The descriptive information in CTS LCO regarding the size and operation of the purge supply and exhaust valves.	3.6.3 Bases	Bases Control Program	1
3.6 LA.22 (C)	Table 3.6-1	The CTS list of secondary containment bypass leakage paths.	UFSAR	10CFR50.59	1

(C) Catawba specific
(M) McGuire specific

LA Change Types:
1. Details of System Design
2. Descriptions of System Operation
3. Procedural Details for Meeting TS Requirements

TABLE LA - REMOVAL OF INFORMATION FROM THE CTS
SECTION 3.6 CONTAINMENT SYSTEMS

DISCUSSION OF CHANGE	CTS REQUIREMENT	SUMMARY OF CHANGE	DESTINATION DOCUMENT	CONTROL PROCESS	CHANGE TYPE
3.6 LA.23	4.6.3.2	CTS description of containment isolation valve testing as being performed during cold shutdown or refueling.	SR 3.6.3.7 Bases	Bases Control Program	3
3.6 LA.24	4.6.2.b	The CTS specified developed head for the containment spray pump when tested pursuant to Specification 4.0.5.	Inservice Testing Program	10CFR50.55a	3
3.6 LA.25	1.7 items a, b, c, and e	CTS description of the attributes of containment operability and integrity.	3.6.1 Bases	Bases Control Program	1
3.6 LA.26	3.6.5.5 and 3.6.5.9	Descriptive information regarding the containment personnel access doors, hatches, and divider barrier seal operability.	3.6.14 Bases	Bases Control Program	1
3.6 LA.27	1.27 items a and c	CTS description of the attributes of reactor building operability and integrity.	3.6.16 Bases	Bases Control Program	1
3.6-LA.28 (M)	4.6.1.2.d.4 and 4.6.1.2.i	Descriptive information regarding the leakage rate testing methods and details for calculations.	3.6.1 Bases	Bases Control Program	3

(C) Catawba specific
(M) McGuire specific

LA Change Types:
1. Details of System Design
2. Descriptions of System Operation
3. Procedural Details for Meeting TS Requirements

TABLE LA - REMOVAL OF INFORMATION FROM THE CTS
SECTION 3.7 PLANT SYSTEMS

DISCUSSION OF CHANGE	CTS REQUIREMENT	SUMMARY OF CHANGE	DESTINATION DOCUMENT	CONTROL PROCESS	CHANGE TYPE
3.7 LA.1	(C) Table 3.7-2 (M) Table 3.7-3	The CTS design description of the orifice size of each MSSV, was moved to the ITS Bases.	3.7.1 Bases	Bases control program	1
3.7 LA.2	(C) Table 3.7-2 (M) Table 3.7-3	The procedural detail in the CTS note which requires the lift setting pressure to correspond to ambient conditions of the valve at nominal operating temperature and pressure, was moved to the ITS Bases.	3.7.1 Bases	Bases control program	3
3.7 LA.3 (C)	3.7.1.6 and SR 4.7.1.6	The CTS descriptive design details about the types of manual controls for the SG PORVs were moved to the ITS Bases.	3.7.4 Bases	Bases control program	1
3.7 LA.4	3.7.1.2 , 4.7.1.2(M) and 4.7.1.2.1 (C)	The descriptive design information in the CTS LCO and procedural details in the associated Surveillance Requirements for the AFW pumps were moved to the ITS Bases and the Inservice Testing (IST) Program for pumps and valves.	3.7.5 Bases and IST Program	Bases control program and IST Program	1, 3
3.7 LA.5	(M) 4.7.1.2.a.3 and (C) 4.7.1.2.1.a.3	The descriptive procedural detail regarding the valve line up for normal supply of condensate to the AFW system was moved to the ITS Bases.	3.7.5 Bases	Bases control program	3
3.7 LA.6	(C) 4.7.1.2.c.4 (M) 4.7.1.2.c.3	The CTS SR details for the accetpance criteria of the response time of the emergency supply water to the AFW system was moved to the UFSAR.	UFSAR	10 CFR 50.59	3
3.7 LA.7 (M)	3.7.4 Figure 3/4 7-1	The CTS system design description details were moved to the ITS Bases.	3.7.7 Bases	Bases control program	1
3.7 LA.8 (C)	3.7.4.a and b	The CTS design description details for the Nuclear Service Water System were moved to the ITS Bases.	3.7.8 Bases	Bases control program	1
3.7 LA.9 (C)	4.7.5.d	The CTS SR for recording the lake water temperature at the discharge path of an operating Nuclear Service Water pump was moved to the Selected Licensee Commitments Manual (SLC).	SLC	10 CFR 50.59	3

(C) Catawba specific
(M) McGuire Specific

LA Change Types:
1. Details of System Design
2. Descriptions of System Operation
3. Procedural Details for Meeting TS Requirements

TABLE LA - REMOVAL OF INFORMATION FROM THE CTS
SECTION 3.7 PLANT SYSTEMS

DISCUSSION OF CHANGE	CTS REQUIREMENT	SUMMARY OF CHANGE	DESTINATION DOCUMENT	CONTROL PROCESS	CHANGE TYPE
3.7 LA.10	3.7.6, Modes 5 and 6, Action b	The CTS Action description of inoperable system conditions that clarifies CTS requirements was moved to the ITS Bases which describes the CRAVS in the background section.	(M) 3.7.9 Bases and (C) 3.7.10 Bases	Bases control program	3
3.7 LA.11 (C)	4.7.6.e.5	The details for performing the CTS SR for testing of the CRAVS trains on High Chlorine/Toxic Gas test signals were moved to the Selected Licensee Commitments (SLC).	SLC	10 CFR 50.59	3
3.7 LA.12	3.7.7 SRs	The details for performing the CTS SRs which describe the procedure for starting the filtered ventilation system through the HEPA filter and carbon absorbers from the control room or via an automatic start signal were moved to the ITS bases.	(C) 3.7.12 Bases (M) 3.7.11 Bases	Bases control program	3
3.7 LA.13 (C)	4.7.7.d.4	The CTS SR to verify that the filter cooling bypass valves can be manually opened once every 18 months was moved to the Selected Licensee Commitments (SLC).	SLC	10 CFR 50.59	3
3.7 LA.14		Not used.			
3.7 LA.15 (C)	4.9.11.2.d.3	The CTS SR to verify that the filter cooling bypass valves can be manually opened once every 18 months was moved to the Selected Licensee Commitments Manual (SLC).	SLC	10 CFR 50.59	3
3.7 LA.16	3.7.6 SRs	The CTS list of procedural details in the 31 day SR for starting the filtered ventilation system through the HEPA filter and carbon adsorbers from the control room or via an automatic start signal was moved to the ITS Bases.	(C) 3.7.10 Bases (M) 3.7.9 Bases	Bases control Program	3
3.7 LA.17 (C)	4.7.6.e.2	The CTS SR details to verify signals in the control room from High Radiation-Air intake or Smoke Density-High were moved to the Selected Licensee Commitments Manual (SLC).	SLC	10 CFR 50.59	3

(C) Catawba specific
(M) McGuire Specific

LA Change Types:
1. Details of System Design
2. Descriptions of System Operation
3. Procedural Details for Meeting TS Requirements

TABLE LA - REMOVAL OF INFORMATION FROM THE CTS
SECTION 3.7 PLANT SYSTEMS

DISCUSSION OF CHANGE	CTS REQUIREMENT	SUMMARY OF CHANGE	DESTINATION DOCUMENT	CONTROL PROCESS	CHANGE TYPE
3.7 LA.18	3.7.1.2, 3.7.3, and 3.7.4 SRs	The statements in CTS SRs for AFW, CCW, and NSWS that describe the performance of the surveillance as "during shutdown" have been moved to the associated ITS Bases.	(C) 3.7.5, 3.7.7, and 3.7.8 Bases (M) 3.7.5, 3.7.6, and 3.7.7 Bases	Bases control program	3
3.7 LA.19		Not used.			
3.7 LA.20	3.9.11 3.9.12	The CTS procedural details in the SRs describing the 31 day start of the filtered ventilation system as being through the HEPA filter and carbon absorbers and initiated from the control room were moved into the ITS Bases.	(C) 3.7.13 Bases (M) 3.7.12 Bases	Bases control program	3
3.7 LA.21		Not used.			
3.7 LA.22 (C)	3.7.1.5	(Unit 2 only)The CTS descriptive design details for the Condensate Storage System including the specific components of the system and the backup water supply were moved to the ITS Bases.	3.7.6 Bases	Bases control program	1
3.7 LA.23	4.7.3 b 1), 4.7.3.b 2), 4.7.4 b 1) and 4.7.4.b 2)	The list of signals in the CTS SR that actuate pumps and valves in the CTS Component Cooling and Nuclear Service Water SRs have been moved to the ITS Bases.	(C) 3.7.7 and 3.7.8 Bases (M) 3.7.6 and 3.7.7 Bases	Bases control program	3
3.7 LA.24	3.6.3	The details for performing CTS Action requirements for isolating inoperable containment isolation valves (main feedwater) were moved to the Bases.	3.7.3 Bases	Bases control program	3

(C) Catawba specific
(M) McGuire Specific

LA Change Types:
1. Details of System Design
2. Descriptions of System Operation
3. Procedural Details for Meeting TS Requirements

TABLE LA - REMOVAL OF INFORMATION FROM THE CTS
SECTION 3.8 ELECTRICAL POWER SYSTEMS

DISCUSSION OF CHANGE	CTS REQUIREMENT	SUMMARY OF CHANGE	DESTINATION DOCUMENT	CONTROL PROCESS	CHANGE TYPE
3.8 LA.1 (M)	4.8.1.1.4	The CTS requirements associated with the 125 VDC battery and charger for the DGs have been moved from the TS to the Selected Licensee Commitments (SLC).	SLC	10 CFR 50.59	1
3.8 LA.2 (C)	3.8.1.1 Action g	The CTS Action requirement procedural detail for a DG operating at greater than 5750 kW be reduced to ≤ 5750 kW within one hour has been moved from the TS to the SLC.	SLC	10 CFR 50.59	3
3.8 LA.3 (C)	3.8.1.1 Action h and SR 4.8.1.1.2d	CTS requirements for the Cathodic Protection System (DG support system) has been moved from the TS to the SLC.	SLC	10 CFR 50.59	1
3.8 LA.4	4.8.1.1.2a.4	The CTS SR procedural detail regarding how the DG is started for a test has been moved to the ITS Bases.	3.8.1 Bases	Bases control program	3
3.8 LA.5		Not used.			
3.8 LA.6	4.8.1.1.2b	The CTS requirements for the DG's day tank to be checked for water and the removal of any water when the DG has been operated for an hour or more has been moved from the TS to the SLC.	SLC	10 CFR 50.59	1
3.8 LA.7	(M) 4.8.1.1.2e.1 (C) 4.8.1.1.2.g.1	CTS requirement for the DG to be subjected to an inspection in accordance with manufacturer's recommendations, in prepared procedures, at least once every 18 months during shutdown has been moved from the TS to the SLC.	SLC	10 CFR 50.59	3
3.8 LA.8	(C) 4.8.1.1.2.g.11 (M) 4.8.1.1.2e.12	The CTS requirement for the verification that the fuel transfer valve transfers fuel from each fuel storage tank to the day tank via the installed cross-connection lines, at least once every 18 months has been moved from the TS to the SLC.	SLC	10 CFR 50.59	1

(C) Catawba specific
(M) McGuire Specific

LA Change Types:
1. Details of System Design
2. Descriptions of System Operation
3. Procedural Details for Meeting TS Requirements

TABLE LA - REMOVAL OF INFORMATION FROM THE CTS
SECTION 3.8 ELECTRICAL POWER SYSTEMS

DISCUSSION OF CHANGE	CTS REQUIREMENT	SUMMARY OF CHANGE	DESTINATION DOCUMENT	CONTROL PROCESS	CHANGE TYPE
3.8 LA.9	(C)4.8.1.1.2.g.12, 4.8.1.1.2.g.13, and 4.8.1.1.2.g.14 (M) 4.8.1.1.2e.13	The CTS listing of the sequencer tolerances within the Table 4.8-2 are moved from the TS to the UFSAR.	UFSAR	10 CFR 50.59	3
3.8 LA.10		Not used.			
3.8 LA.11	(C) 4.8.1.1.2.i.3 (M) 4.8.1.1.2g.2	The CTS requirements for tests and measurements on the diesel fuel oil system tanks have been moved from the TS to the SLC.	SLC	10 CFR 50.59	1
3.8 LA.12 (C)	3.8.1.1 Action c	The CTS requirement for an evaluation of the steam driven auxiliary feedwater pump to determine OPERABILITY has been moved from the TS to the ITS Bases.	3.8.1 Bases	Bases control program	3
3.8 LA.13		Not used.			
3.8 LA.14		Not used.			
3.8 LA.15	3.8.1.2 Action	The CTS procedural instructions for operations of loads over fuel storage pool have been moved from the TS to the SLC.	SLC	10 CFR 50.59	3
3.8 LA.16	(C) 4.8.1.1.2.e (M) 4.8.1.1.2.c	The CTS descriptive information on the ASTM standards to which a sample must be subjected was moved to the ITS bases.	(C) SR 3.8.3.3 Bases (M) SR 3.8.3.4 Bases	Bases control program	3
3.8 LA.17	(C) 4.8.1.1.2.i.1 (M) 4.8.1.1.2.g.1	The descriptive information in the CTS SR regarding the solution which is needed for the cleaning of the fuel oil storage tank was moved to the ITS bases.	3.8.3.5 Bases	Bases control program	3

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LA Change Types:
1. Details of System Design
2. Descriptions of System Operation
3. Procedural Details for Meeting TS Requirements

TABLE LA - REMOVAL OF INFORMATION FROM THE CTS
SECTION 3.8 ELECTRICAL POWER SYSTEMS

DISCUSSION OF CHANGE	CTS REQUIREMENT	SUMMARY OF CHANGE	DESTINATION DOCUMENT	CONTROL PROCESS	CHANGE TYPE
3.8 LA.18	(C) 3.8.1.1, 3.8.1.2, and 3.8.2.1 (M) 3.8.2.1	The detailed descriptions of the equipment for a DC channel or the specific names of a channel or bus were moved to the ITS Bases	(C) 3.8.4 and 3.8.5 Bases (M) 3.8.9	Bases control program	3
3.8 LA.19	(C) 4.8.1.1.4.e and 4.8.2.1.1.f (M) 4.8.2.1.2 f	The CTS descriptive details for battery capacity and indicated battery degradation were moved to the ITS Bases.	3.8.4 Bases	Bases control program	3
3.8 LA.20 (C)	4.8.1.1.4.c.2	The CTS descriptive details regarding anti-corrosion materials in accordance with manufacturer's recommendations was moved to the ITS Bases.	3.8.4 Bases	Bases control program	3
3.8 LA.21 (C)	4.8.1.1.4.c.3	The CTS descriptive details for the torque setting of the pole screws on the DG batteries were moved to the ITS Bases.	3.8.4 Bases	Bases control program	3
3.8 LA.22		Not used.			
3.8 LA.23	(C) 3.8.3.1 (M) 3.8.3.1 and 3.8.3.2	The CTS description of the association between the inverters, DC buses and the tie breakers of these buses and specific inverter labels were moved to the ITS Bases.	3.8.9 Bases	Bases control program	3
3.8 LA.24		Not used.			
3.8 LA.25 (C)	3.8.2.1	CTS LCO description that the spare battery charger be powered from the same train which it will be supplying was moved to the ITS Bases.	3.8.4 Bases	Bases control program	3
3.8 LA.26	3.8.2.1 and 3.8.3.1	The CTS LCO requirement that a bus must be energized is revised to read the bus must be OPERABLE, and the ITS Bases provides the clarification that OPERABLE is energized.	3.8.9 Bases	Bases control program	3
3.8 LA.27	(C) 4.8.1.1.4.c and 4.8.2.1.1.d.2 (M) 4.8.2.1.2 d	The CTS descriptive details for battery testing regarding the length of time and amperage requirements have been moved to the ITS Bases.	3.8.4 Bases	Bases control program	3

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LA Change Types:
1. Details of System Design
2. Descriptions of System Operation
3. Procedural Details for Meeting TS Requirements

TABLE LA - REMOVAL OF INFORMATION FROM THE CTS
SECTION 3.8 ELECTRICAL POWER SYSTEMS

DISCUSSION OF CHANGE	CTS REQUIREMENT	SUMMARY OF CHANGE	DESTINATION DOCUMENT	CONTROL PROCESS	CHANGE TYPE
3.8 LA.28	3.8.1.1 Actions b and d	The CTS descriptions regarding exceptions to the testing of the has been moved to the ITS Bases.	3.8.1 Bases	Bases control program	3
3.8 LA.29	(C) 4.8.1.1.2.g.2 (M) 4.8.1.1.2.e 2	The CTS specific value for the single load rejection that a DG must be capable of withstanding, while maintaining a specified frequency has been moved from the TS to the ITS Bases.	SR 3.8.1.9 Bases	Bases control program	3
3.8 LA.30	(C)4.8.1.1.2.g.14 and 4.8.1.1.2.g.15 (M)4.8.1.1.2.e.14	The CTS requirements to verify diesel lockout features and prevent the diesel from starting when the DG is on the turning gear or the maintenance mode switch is activated have been moved to the SLC. This is a design feature of the DG which is not required within the TS.	SLC	10 CFR 50.59	1
3.8 LA.31(M)	4.8.1.1.2 e.6.c Footnote	The CTS exception to testing the DG when the plant is not in a shutdown condition (Modes 1, 2, 3, and 4) has been moved to the ITS Bases.	SR 3.8.1.13	Bases control program	3
3.8 LA.32	4.8.2.1.2 b.3	The specific number of battery cells listed in the CTS has been moved from the TS to the ITS Bases.	3.8.6 Bases	Bases control program	3
3.8 LA.33 (C)	4.8.1.1.4.a	The CTS footnote describing the procedure to test two different cells on the DG batteries each month has been moved to ITS Bases.	3.8.6 Bases	Bases control program	3

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LA Change Types:
1. Details of System Design
2. Descriptions of System Operation
3. Procedural Details for Meeting TS Requirements

TABLE LA - REMOVAL OF INFORMATION FROM THE CTS
SECTION 3.9 REFUELING OPERATIONS

DISCUSSION OF CHANGE	CTS REQUIREMENT	SUMMARY OF CHANGE	DESTINATION DOCUMENT	CONTROL PROCESS	CHANGE TYPE
3.9 LA.1	3.9.1 Action	The detail of the CTS Action that stipulates how to restore the boron concentration to within limits (borate at greater than or equal to 30 gpm of a solution...), was moved to the ITS Bases.	3.9.1 Bases	Bases control program	3
3.9 LA.2	4.9.1.2	The detail in the CTS Surveillance Requirement which specifies that boron concentration be determined by chemical analysis, was moved the ITS Bases.	3.9.1 Bases	Bases control program	3
3.9 LA.3 (M)	4.9.1.3	The detail in the CTS surveillance which identify the unborated water source valves was moved to the ITS Bases.	3.9.2 Bases	Bases control program	3
3.9 LA.4 (C)	3.9.2.1	The detail in the CTS regarding the Boron Dilution Mitigation System operating alarms, was moved to the ITS Bases	3.9.2 Bases	Bases control program	3
3.9 LA.5 (C)	3.9.2.1	The detail in the CTS, that specifies the unborated water source valve number was moved to the ITS Bases.	3.9.2 Bases	Bases control program	3
3.9 LA.6	3.9.2.1 (C) 3.9.2 (M)	The specific description in the CTS of the Source Range Neutron Flux Monitors operating with alarm setpoints at 0.5 decade above steady-state count rate and having continuous visual indication in the control room was moved to the ITS Bases.	3.9.2 Bases (C) 3.9.3 Bases (M)	Bases control program	1
3.9 LA.7 (C)	4.9.4.2.a	The description in the CTS of how the ventilation system is aligned for testing was moved to the ITS Bases.	3.9.3 Bases	Bases control program	3
3.9 LA.8	3.9.8.2	The CTS requirement, that the two RHR loops be independent was moved to the UFSAR.	UFSAR	10CFR50.59	1
3.9 LA.9	3/4.9.3	The CTS requirements for "Decay Time" were moved to the Selected Licensee Commitments Manual.	SLC	10CFR50.59	3
3.9 LA.10	3.9.1	The detail in the CTS regarding maintaining a K_{eff} of 0.95 or less was moved to the ITS Bases.	3.9.1 Bases	Bases control program	3

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LA Change Types:
1. Details of System Design
2. Descriptions of System Operation
3. Procedural Details for Meeting TS Requirements

TABLE LA - REMOVAL OF INFORMATION FROM THE CTS
SECTION 4.0 DESIGN FEATURES

DISCUSSION OF CHANGE	CTS REQUIREMENT	SUMMARY OF CHANGE	DESTINATION DOCUMENT	CONTROL PROCESS	CHANGE TYPE
4.0 LA.1	5.1.1, 5.1.2, and 5.1.3,	CTS Figures 5.1-1, 5.1-2, 5.1-3 and 5.1-4 containing the maps defining the general site area, low population zone, and unrestricted areas and site boundary for gaseous and liquid effluents have been relocated and replaced in the TS with a text description.	UFSAR	10CFR50.59	3
4.0 LA.2	5.2 and 5.4	The CTS descriptions of the containment configuration and design pressure and temperature and Reactor Coolant System design pressure and temperature have been relocated.	UFSAR	10CFR50.59	1
4.0 LA.3	5.3.2	Details of the design of the rod cluster control assemblies, such as percent composition and length, are removed.	UFSAR	10CFR50.59	1
4.0 LA.4	5.5	The CTS description of the location of the meteorological tower has been relocated.	UFSAR	10CFR50.59	1
4.0 LA.5 (C)	5.3.1	The CTS tolerance (± 0.05 wt% U-235) associated with the reload fuel nominal enrichment requirement is relocated.	3.7.15 Bases and 3.7.16 Bases	Bases Control Program	1

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LA Change Types:
1. Details of System Design
2. Descriptions of System Operation
3. Procedural Details for Meeting TS Requirements

TABLE LA - REMOVAL OF INFORMATION FROM THE CTS
SECTION 5.0 ADMINISTRATIVE CONTROLS

DISCUSSION OF CHANGE	CTS REQUIREMENT	SUMMARY OF CHANGE	DESTINATION DOCUMENT	CONTROL PROCESS	CHANGE TYPE
LA.1	6.1.2	The CTS requirement for a management directive on the control room command function to be signed by the Site Vice President, Nuclear and reissued on an annual basis is deleted from the CTS. The command structure is adequately described in the UFSAR. The requirements within the CTS to restate this on an annual basis is redundant to the existing requirements and is unnecessary.	UFSAR	10CFR50.59	1
LA.2		Not used.			
LA.3	6.2.3	The CTS requirements for the Safety Review Group (SRG)were moved to the Quality Assurance Topical Report. The SRG function will be addressed in adequate detail by the QA Topical Report and is not necessary to be repeated in the TS. Changes to the QA Topical Report require a 10 CFR 50.54 evaluation.	QA Topical Report	10 CFR 50.54	1
LA.4		Not used.			
LA.5		Not Used.			
LA.6	6.5.1, 6.8.1.h, 6.8.1.j , 6.8.2, 6.8.3, 6.6.1.b, and 6.14.2	The following CTS requirements which delineate the PORC and Technical Review and Control requirements, require each procedure to be reviewed by an appropriate manager or designee, address temporary changes to procedures, specify requirements for reviewing reportable events, and specify review requirements for the ODCM, were moved to the Quality Assurance Topical Report.	QA Topical Report	10 CFR 50.54	1
LA.7	6.5.2	The CTS requirements for the offsite review committee (Nuclear Safety Review Board (NSRB)) which specify the Function, Composition, Alternatives, Consultants, Meeting Frequency, Quorum, Review, Audits, and Records of the NSRB were moved to the Quality Assurance Topical Report.	QA Topical Report	10 CFR 50.54	1
LA.8		Not used.			

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LA Change Types:
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2. Descriptions of System Operation
3. Procedural Details for Meeting TS Requirements

TABLE LA - REMOVAL OF INFORMATION FROM THE CTS
SECTION 5.0 ADMINISTRATIVE CONTROLS

DISCUSSION OF CHANGE	CTS REQUIREMENT	SUMMARY OF CHANGE	DESTINATION DOCUMENT	CONTROL PROCESS	CHANGE TYPE
LA.9	6.7	he CTS Safety Limit Violation requirements, were moved to the QA Topcial Report. These requirements delineate the required actions to be taken in the event of a Safety Limit violation.	QA Topical Report	10 CFR 50.54	3
LA.10	6.8.1.e and 6.13	The CTS requirements related to the Process Control Program were moved to the UFSAR. .	UFSAR	10 CFR 50.59	3
LA.11	6.8.4.b	The CTS requirements for the "In-Plant Radiation Monitoring," program were moved to the UFSAR. This requirement does not affect the health and safety of "Members of the Public," but it is essential for As Low as Reasonably Achievable (ALARA) programs.	UFSAR	10 CFR 50.59	3
LA.12	6.8.4.d	The CTS requirement for a Backup Method of Determining Subcooling Margin Program was moved to the ITS Post Accident Monitoring bases.	ITS 3.3.3 Bases	Bases control program	3
LA.13	6.8.4.g	The CTS requirements for a "Radiological Environmental Monitoring Program," were moved to the Selected Licensee Commitments Manual (SLC) (UFSAR Chapter 16).	SLC	10 CFR 50.59	3
LA.14	(M) 3/4.11.1.4, 3/4.11.2.5, and 3/4.11.2.6 (C) 3/4.11.1.1, 3/4.11.2.1, and 3/4.11.2.2,	The general CTS requirements for "Liquid Holdup Tanks, "Explosive Gas Mixture," and "Gas Storage Tanks," were moved to the ITS Explosive Gas and Storage Tank Radioactivity Monitoring Program. The specific details of these CTS requirements were moved to the Selected Licensee Commitments Manual (UFSAR Chapter 16).	SLC	10 CFR 50.59	3
LA.15	6.9.1.1 - 6.9.1.3	The CTS "Startup Report," requirements for submitting a report following receipt of an operating license; installation of fuel that has a different design or has been manufactured by a different fuel supplier; modifications that may have altered the nuclear, thermal, or hydraulic performance of the unit; and amendments to the license involving planned increase in power operation were moved to the UFSAR.	UFSAR	10 CFR 50.59	3

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TABLE LA - REMOVAL OF INFORMATION FROM THE CTS
SECTION 5.0 ADMINISTRATIVE CONTROLS

DISCUSSION OF CHANGE	CTS REQUIREMENT	SUMMARY OF CHANGE	DESTINATION DOCUMENT	CONTROL PROCESS	CHANGE TYPE
LA.16		Not used.			
LA.17	4.6.1.8, 4.7.6, 4.7.7, 4.9.4, and 4.9.11	The CTS ventilation filter Surveillance Requirements that are not being moved to the individual new ITS or Chapter 5.0 Ventilation Filter Testing Program were re moved from the CTS and placed in the Ventilation Filter Testing Program (VFTP).	VFTP	ITS 5.5.11	3
LA.18	6.10	The CTS requirements for "Record Retention" was moved to the Quality Assurance Topical Report.	QA Topical Report	10 CFR 50.54	3
LA.19		Not used.			
LA.20	6.15	The CTS requirements for the "Major Changes to Liquid, Gaseous, and Solid Radwaste Treatment Systems," were moved to the Selected Licensee Commitments (SLC) Manual.	SLC	10 CFR 50.59	3
LA.21	Table 5.7-1	The CTS information on component cyclic or transient limits and design cycle or transients were moved to the UFSAR.	UFSAR	10 CFR 50.59	1
LA.22		Not used.			

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LA Change Types:
1. Details of System Design
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TABLE R - RELOCATED SPECIFICATIONS

DISCUSSION OF CHANGE	CTS REQUIREMENT	DESCRIPTION OF RELOCATED REQUIREMENT	DESTINATION DOCUMENT	CONTROL PROCESS
3.1 R.1	3/4.1.2.1	Minimum boron injection flow paths, Modes 5 and 6	SLC	10 CFR 50.59
3.1 R.2	3/4.1.2.2	Minimum boron injection flow paths, Modes 1, 2, 3, and 4	SLC	10 CFR 50.59
3.1 R.3	3/4.1.2.3	Charging pump in boron injection flow path, Modes 5 and 6	SLC	10 CFR 50.59
3.1 R.4	3/4.1.2.4	Charging pumps, Modes 1, 2, 3, and 4	SLC	10 CFR 50.59
3.1 R.5	3/4.1.2.5	Borated water sources, Modes 5 and 6	SLC	10 CFR 50.59
3.1 R.6	3/4.1.2.6	Borated water sources, Modes 1, 2, 3, and 4	SLC	10 CFR 50.59
3.1 R.7	3/4.1.3.3	Digital rod position indicator channels for each shutdown and control rod in Modes 3, 4, and 5	SLC	10 CFR 50.59
3.3 R.4	3/4.3.3.1	The following radiation monitors: containment atmosphere gaseous detector channel for effluent monitoring (EMF-39), Fuel Storage Pool Radioactivity Monitor (EMF-42), Fuel Storage Pool Criticality Radiation Monitor (EMF-15) (C) and (EMF-17 for Unit 1 and EMF-4 for Unit 2) (M), Control Room Air Intake Gaseous Radiation Monitors (EMF-43A, 43B), Auxiliary Building Ventilation Gaseous Radioactivity Monitor (EMF-41) (C) and the Component Cooling Water System Radiation Monitors (EMF-46A, 46B) (C).	SLC	10 CFR 50.59
3.3 R.1	3/4.3.3.2	Movable incore detection system	SLC	10 CFR 50.59
3.3 R.2	3/4.3.3.7 (C)	Chlorine detection system	SLC	10 CFR 50.59
3.3 R.3	3/4.3.3.9 (M) 3/4.3.3.10 (C)	Explosive gas monitoring instrumentation	SLC	10 CFR 50.59
3.4 R.1	3/4.4.2.1	Pressurizer safety valves, Modes 4 and 5	SLC	10 CFR 50.59
3.4 R.2	3/4.4.7	RCS chemistry	SLC	10 CFR 50.59
3.4 R.3	3/4.4.9.2	Pressurizer heatup and cooldown limits	SLC	10 CFR 50.59

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(M) McGuire Specific

TABLE R - RELOCATED SPECIFICATIONS

DISCUSSION OF CHANGE	CTS REQUIREMENT	DESCRIPTION OF RELOCATED REQUIREMENT	DESTINATION DOCUMENT	CONTROL PROCESS
3.4 R.4	3/4.4.10	Structural integrity of ASME Code Class 1, 2, and 3 components	SLC	10 CFR 50.59 10 CFR 50.55a
3.4 R.5	3/4.4.11	RCS vent paths operable and closed for reactor vessel head and pressurizer steam space (C) and Reactor vessel head vent paths operable and closed (M)	SLC	10 CFR 50.59
3.6 R.1	3/4.6.5.2	Ice bed temperature monitoring system	SLC	10 CFR 50.59
3.6 R.2	3/4.6.5.4	Ice condenser inlet door position monitoring system	SLC	10 CFR 50.59
3.7 R.1	3/4.7.2	Steam generator pressure/temperature limitations	SLC	10 CFR 50.59
3.7 R.5	3/4.7.8	Snubbers	SLC	10 CFR 50.59
3.7 R.3	3/4.7.9	Sealed source contamination limits	SLC	10 CFR 50.59
3.7 R.4	3/4.7.12 (C) 3/4.7.13 (M)	Ground water level near reactor and auxiliary buildings (C) Ground water level near auxiliary building (M)	SLC	10 CFR 50.59
3.7 R.2	3/4.7.12 (M)	Area temperature monitoring	SLC	10 CFR 50.59
3.7 R.6	3/4.7.13 (C)	Standby Shutdown System	SLC	10 CFR 50.59
3.8 R.1	3/4.8.4	Containment penetration conductor overcurrent protection devices	SLC	10 CFR 50.59
3.9 R.1	3/4.9.5	Communications between Control Room and Refueling Station	SLC	10 CFR 50.59
3.9 R.2	3/4.9.6	Reactor building manipulator crane and auxiliary hoist	SLC	10 CFR 50.59
3.9 R.3	3/4.9.7	Load handling restrictions over fuel assemblies in storage pool	SLC	10 CFR 50.59

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(M) McGuire Specific