Mr. Charles H. Cruse
Vice President - Nuclear Energy
Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, MD 20657-4702

August 26, 1997

SUBJECT: STATUS OF CALVERT CLIFFS IMPROVED TECHNICAL SPECIFICATIONS CONVERSION SUBMITTAL

Dear Mr. Cruse:

On August 21, 1997, NRR staff spoke to Peter Chabot and Ray Schiele, Baltimore Gas and Electric Company (BGE) licensing management, regarding the status of the Calvert Cliffs Technical Specifications conversion to the Improved Technical Specifications (ITS). The purpose of the phone call was to reaffirm NRC's commitment to successfully complete the Calvert Cliffs conversion with BGE assistance. When we receive BGE responses to all NRC comments we will be able to give you a date for the draft Calvert Cliffs Safety Evaluation (SE).

Enclosed is a copy of the draft H. B. Robinson SE to provide your staff with a newly proposed format for future SEs. The draft SE departs from previously issued SEs through the use of tables to provide a more concise document. The licensee assisted NRC in preparing the tables. The enclosed draft SE remains under internal NRC review, but the format has been discussed with senior NRR management and the Office of General Council (OGC) and has been simultaneously mailed to the licensee and a copy placed in the Public Document Room (PDR).

We appreciate the discussion candor of August 21, and look forward to working with BGE to complete the Calvert Cliffs conversion and issuance of the SE.

Sincerely,

Original signed by:

William D. Beckner, Chief
Technical Specifications Branch
Associate Director for Projects
Office of Nuclear Reactor Regulation

Docket Nos. 50-317
and 50-318

Enclosure: Draft H. B. Robinson SE

cc: See next page

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

August 26, 1997

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. ## TO FACILITY OPERATING LICENSE DPR-23

H. B. ROBINSON STEAM ELECTRIC PLANT UNIT NO. 2

CAROLINA POWER & LIGHT COMPANY

DOCKET NO. 50-261

I. INTRODUCTION

H. B. Robinson Steam Electric Plant Unit No. 2 (HBR) has been operating with technical specifications (TS) issued with the original operating license on July 31, 1970, as amended from time to time. By letter dated August 27, 1996, as supplemented by letters dated January 17, February 18, March 27, April 4, April 25, April 29, May 30, June 2, June 13, June 18, August 4, and August 8, 1997, Carolina Power & Light (the licensee) proposed to amend Appendix A of Operating License No. DPR-23 to completely revise the HBR TS. The proposed amendment was based upon NUREG-1431, "Standard Technical Specifications - Westinghouse Plants," Revision 1, dated April 1995, and upon guidance in the "NRC Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (Final Policy Statement), published on July 22, 1993 (58 FR 39132). The overall objective of the proposed amendment, consistent with the Final Policy Statement, was to rewrite, reformat, and streamline completely the existing TS for HBR.

Hereinafter, the proposed TS are referred to as the improved TS (ITS), the existing HBR TS are referred to as the current TS (CTS), and the TS in NUREG-1431 are referred to as the standard TS (STS). The corresponding TS Bases are ITS Bases, CTS Bases, and STS Bases, respectively.

In addition to basing its ITS on STS and the Final Policy Statement, 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 30, 1996. Based on these discussions, the licensee revised its proposed changes by submittals dated August 8, 1997, and [**] 1997. In addition, the licensee proposed matters of a generic nature that were not in STS. The NRC staff requested that the licensee submit such generic issues as a proposed change to STS through the Nuclear Energy Institute's Technical Specifications Task Force (TSTF). These generic issues were considered for specific applications in the HBR ITS. Consistent with the Final Policy Statement, the licensee proposed transferring some CTS requirements to licensee-controlled documents. In addition, human factors principles were emphasized to add clarity and understanding to the CTS requirements being retained in the

ITS and to define more clearly the appropriate scope of the ITS. Further, significant changes were proposed to the CTS Bases to make each ITS requirement clearer and easier to understand.

The Commission's proposed action on the HBR application for an amendment dated August 27, 1996, was published in the FEDERAL REGISTER on October 29, 1996 (61 FR 55830). Supplements to the licensee's ITS proposal, submitted by letters dated January 17, February 18, March 27, April 4, April 25, April 29, May 30, June 2, June 13, June 18, August 4, and August 8, 1997, that resulted from discussions with the licensee during the staff review, are incorporated in this Safety Evaluation (SE). These plant-specific changes serve to clarify the ITS with respect to the guidance in the Final Policy Statement and STS. Therefore, the changes are within the scope of the action described in the initial FEDERAL REGISTER notice.

During its review, the NRC staff relied on the Final Policy Statement and on STS as guidance for acceptance of CTS changes. This SE provides a summary basis for the staff conclusion that HBR 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 staff also acknowledges that, by the Final Policy Statement, the conversion to STS is a voluntary process. Therefore, ITS differs from STS, reflecting the current licensing basis. The staff accepts the licensee changes to the CTS with modifications documented in the revised submittals.

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

II. BACKGROUND

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

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

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

For several years, NRC and industry representatives have sought to develop guidelines for improving the content and quality of nuclear power plant TS. On February 6, 1987, the Commission issued an interim policy statement on TS improvements, "Interim Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (52 FR 3788). During the period from 1989 to 1992, the utility Owners Groups and the NRC staff developed improved standard technical specifications that would establish models of the Commission's policy for each primary reactor type. In addition, the staff, licensees, and Owners Groups developed generic administrative and editorial guidelines in the form of a "Writers 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. STS were established as a model for developing improved TS for Westinghouse plants in general. STS reflect the results of a detailed review of the application of the interim policy statement criteria to generic system functions, which were published in a "Split Report" issued to the Nuclear Steam System Supplier (NSSS) Owners Groups in May 1988. STS also reflect the results of extensive discussions concerning various drafts of STS, so that the application of the TS criteria and the Writer's Guide would consistently reflect detailed system configurations and operating characteristics for all NSSS designs. As such, the generic Bases presented in NUREG-1431 provide an abundance of information regarding the extent to which the STS present requirements that are necessary to protect the public health and safety.

On July 22, 1993, the Commission issued its Final Policy Statement, expressing the view that satisfying the guidance in the policy statement also satisfies Section 182a of the Act and 10 CFR 50.36. The Final Policy Statement described the safety benefits of the improved STS, and encouraged licensees to use the improved STS as the basis for plant-specific TS amendments, and for complete conversions to improved STS. Further, the Final Policy Statement gave guidance for evaluating the required scope of the TS and defined the guidance criteria to be used in determining which of the LCOs and associated surveillances should remain in the TS. The Commission noted (58 FR 39132) 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* 36593, July 19, 1995). The Final Policy Statement criteria are as follows:

Criterion 1

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

Criterion 2

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

Criterion 3

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

Criterion 4

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

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

III. EVALUATION

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

The staff review identified the need for clarifications and additions to the submittal in order to establish an appropriate regulatory basis for translation of current TS requirements into ITS. Each change proposed in the amendment request is identified as either a discussion of change to CTS or a justification for deviation from STS. The staff comments were documented as requests for additional information (RAIs) and forwarded to the licensee for response by letters dated January 10, February 24, March 6, March 28, April 9, and May 22, 1997. The licensee provided written responses to the staff requests in letters dated February 18, March 27, April 4, April 25, April 29, May 30, June 13, June 18, and August 8, 1997. The docketed letters clarified and revised the licensee basis for translating CTS requirements into ITS. The staff finds that the docketed material related to the review of ITS provides sufficient detail to reach conclusion regarding the adequacy of the licensee proposed changes.

The license amendment application was organized such that changes were included in each of the following CTS change categories, as appropriate: administrative changes, less restrictive requirements (LR), more restrictive requirements (MR), STS differences, and relocated specifications.

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

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

(3) More Restrictive, require, i.e., new or additional CTS requirements;

(4) STS differences, i.e., retention of existing requirements based on plant-specific design or current licensing basis; and

(5) Relocated specifications (from CTS Chapter 3/4.0 only), i.e., relaxations in which whole specifications (the LCO and associated action and SR) are removed from the existing TS (an NRC-controlled document) and placed in licensee-controlled documents.

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

Administrative Changes

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

Conclusion

The staff reviewed all of the administrative and editorial changes proposed by the licensee and finds them acceptable, because they are compatible with the Writers Guide and STS and are consistent with the Commission's regulations.

More Restrictive Requirements

The licensee, in electing to implement the specifications of STS proposed a number of requirements more restrictive than those in the CTS. ITS requirements in this category include requirements that are either new, more conservative than corresponding requirements in the CTS, or that have additional restrictions that are not in the CTS but are in STS. Examples of more restrictive requirements are placing an LCO on plant equipment which is not required by the CTS to be operable, more restrictive requirements to restore inoperable equipment, and more restrictive SRs.

Table MR lists the more restrictive changes proposed in ITS. Table MR is organized by the corresponding ITS section discussion of change and provides a summary description of the more restrictive change that was adopted, and CTS and ITS LCO references.

Conclusion

These changes are additional restrictions on plant operation and are appropriate and acceptable.

Less Restrictive Requirements

Less restrictive requirements include changes, deletions and relaxations to portions of current TS requirements that are not being retained in ITS, or the ITS Bases. When requirements have been shown to give little or no safety benefit, their removal from the TS may be appropriate. In most cases, relaxations previously granted to individual plants on a plant-specific basis were the result of (1) generic NRC actions, (2) new staff positions that have evolved from technological advancements and operating experience, or (3) resolution of the Owners Groups comments on STS. The NRC staff reviewed generic relaxations contained in STS and found them acceptable because they are consistent with current licensing practices and the Commission's regulations. The HBR design was also reviewed to determine if the specific design basis and licensing basis are consistent with the technical basis for the model requirements in STS, and thus provide a basis for ITS .

A significant number of changes to the CTS involved the removal of specific requirements and detailed information from individual specifications. Such changes have been made to requirements and detailed information of the following general Categories:

Category 1	CTS LCO Applicability changes (Category I)
Category 2	CTS Surveillance Frequency changes (Category II)
Category 3	CTS LCO revised to address train configuration (Category III)
Category 4	CTS Allowed outage time extensions (Categories IV & VII)
Category 5	CTS Action requirements for exiting LCOs are changed (Category V)

Category 6 CTS surveillance acceptance criteria are changed (Category VI)

Category 7 Elimination of CTS reporting requirements (Category VIII)

Category 8 Relaxation of LCO requirement (Category IX)

The staff has reviewed changes to the CTS in the above categories and concluded that these types of detailed information and specific requirements are not necessary to ensure the effectiveness of ITS to adequately protect the health and safety of the public because they do not affect safe operation of the plant. The TS requirements that remain are consistent with current licensing practices, operating experience, and plant accident and transient analyses, and provide reasonable assurance that the public health and safety will be protected.

The following discussions address why each of the eight categories of information or specific requirements do not need to be included in ITS .

CTS LCO Applicability changes **(Category I)**

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

ITS use defined modes or applicable conditions that are consistent with the application of the plant safety analysis assumptions for operability of the required features. In another application of this type of change, CTS requirements may be eliminated during conditions for which the safety function of the specified safety system is met because the feature is performing its intended safety function. Deleting applicability requirements that are indeterminant or which are inconsistent with application of accident analyses assumptions is acceptable because when LCOs cannot be met, the TS can be satisfied by exiting the applicabilty thus taking the plant out of the conditions that require the safety system to be operable. These changes are consistent with STS. Therefore, deletion of Category 1 requirements is acceptable.

CTS Surveillance Frequency changes **(Category II)**

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

Reduced testing can result in a safety enhancement because the unavailability due to test is reduced; however, reliability of the affected structure, system or component should remain constant or increase. Reduced testing is acceptable if operating experience,

industry practice or the industry standards such as manufacturers' recommendations have shown that these components usually pass the Surveillance when performed at the specifed interval, thus the freqency is acceptable from a reliability standpoint. Alternate train testing is acceptable if there are other qualitative or quantitative test requirements which are established predictors of system performance, e.g., air flow is an indicator that positive pressure in a controlled space will be maintained since a more frequent (31day) air flow test would use the same fans as the less frequent (36 month) pressurization test and experience shows that components usually pass the pressurization test. Surveillance frequency extension can be based on staff-approved topical reports. The staff can accept topical report changes if the topical report bounds the plant-specific design and component reliabiltiy assumptions are met. These changes are consistent with STS. Therefore, deletion of Category 2 requirements is acceptable.

CTS LCO revised to address train configuration **(Category III)**

Due to the redundancy of trains and the diversity of subsystems, the inoperability of one component in a train does not render a safety system incapable of performing its intended design function. Neither does the inoperability of two different components, each in a different train, necessarily result in a loss of functional capability for a safety system. The intent of STS Conditions is to control the inventory of the equipment taken credit for in the safety analysis such that a sufficient complement of safety systems is available to perform their intended safety function for analyzed accidents. This allows increased flexibility in plant operations under circumstances when components in different trains are inoperable; however, fundamental requirements for train separation are required to be met.

Specified STS Actions and Completion Times for trains are based on availability of redundant operable features, reasonable time for repairs, and low probability of a design basis accident (DBA) occurring during the period features remain inoperable. In general the STS use industry practice or industry standards for restoring trains to operable status. These changes are consistent with STS. Therefore, deletion of Category 3 requirements is acceptable.

CTS Allowed outage time extensions **(Category IV & VII)**

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

Adopting completion times from the STS is acceptable because completion times take into account the operability status of the redundant systems of TS required features, the capacity and capability of remaining features, a reasonable time for repairs or replacement of required features, and the low probability of a DBA occurring during the repair period. These changes are consistent with STS. Therefore, extension of Category 4 allowed outage times is acceptable.

CTS Action requirements for exiting LCOs are changed **(Category V)**

CTS require that, in the event that any of the specified LCOs are not met, specified reactor operations shall cease, work shall be initiated to correct the conditions so that the specified limits are met, and no operations which may affect reactivity of the core shall be made. The STS actions are constructed to specify only conditions of required features made inoperable. Change to CTS action requirements for exiting LCO applicabilities is acceptable because CTS conditions include actions which also apply when some or all required features are inoperable. This change is also acceptable because the Required Actions assure that operations that could challenge other TS systems are ceased within an appropriate Completion Time. Additionally, making these types of changes is acceptable because they place the reactor in a Mode where the specification no longer applies; and these actions provide the same degree of protection required by the applicable safety analyses. These changes are consistent with STS. Therefore, deletion of Category 5 requirements is acceptable.

CTS surveillance requirement acceptance criteria are changed **(Category VI)**

CTS require safety systems to be tested and verified operable prior to entering applicable conditions. ITS provide the additonal requirement to verify operablility by actual or test conditions. Adopting the STS allowance is acceptable because TS required features cannot distinguish between an "actual" signal or a "test" signal. Category 6 also includes changes to CTS requirements that are replaced in the ITS with separate and distinct testing requirements which when combined include operability verification of all TS required components for the features specified in the CTS. Adopting this format preference in the STS is acceptable because TS SRs that remain include testing of all previous features required to be verified operable. These changes are consistent with STS. Therefore, deletion of Category 6 requirements is acceptable.

Elimination of CTS reporting requirements **(Category VIII)**

CTS include requirements to submit Special Reports when specified limits are not met. Typically, the time period for the report to be issued is within 30 days. However, the STS eliminates the TS administrative control requirements for Special Reports and instead relies on the reporting requirements governed by the requirements of 10 CFR 50.73. ITS changes to reporting requirements are acceptable because special reporting requirements do not assure that the plant will operate in a safe manner and there is no regulatory basis for the staff to accept or deny the reports it receives. Therefore, this change has no impact on the safe operation of the plant. Additionally, deletion of TS reporting requirements reduces the administrative burden on the plant and allows efforts to be concentrated on restoring TS required limits. These changes are consistent with STS. Therefore, deletion of Category 7 requirements is acceptable.

Relaxation of LCO requirement **(Category IX)**

CTS list acceptable devices that may be used to satisfy the LCO requirements. The ITS reflect the STS approach to provide requirements that specify the protective limit that is required to meet the safety analysis assumptions for operable features in place of acceptable mechanisms that are acceptable for meeting the TS limit for the specified feature. The ITS changes provide the same degree of protection required by the safety analysis and provide flexibility for meeting limits without adversely affecting operations since equivalent features are required to be operable. These changes are consistent with STS. Therefore, deletion of Category 8 requirements is acceptable.

Table L lists specific CTS requirements that have been deleted and which pertain to the above general types of changes. Table L is organized by ITS section discussion of change and provides a summary description of the change, CTS and ITS LCO references, a reference to the specific change category as discussed above, and a characterization of the discussion of change. These eight general categories of CTS requirements that have been deleted from CTS are not required by 10 CFR 50.36 to be in the TS.

The licensee, in electing to implement the specifications of STS, also proposed a number of requirements less restrictive than those in the CTS and which are not included in the general discussion of change-types. The most significant of these changes are discussed below.

Section 1.0

L.1 The CTS 1.6.2 defines channel calibration to encompass the entire channel and does not exclude resistance temperature devices (RTDs) and thermocouples. For channels with RTDs and/or thermocouples, the ITS definition of channel calibration allows performing "...an in place qualitative assessment of sensor behavior..." for these devices. This change is a less restrictive requirement for unit operations and is consistent with the STS. A qualitative assessment of sensor behavior is acceptable for RTDs and thermocouples since the operation of these devices is governed by well understood and predictable physical relationships between the temperature of the sensed medium and the output of the RTD or thermocouple. Additionally, the output of RTDs and thermocouples is the same manner as other sensors. As a result a qualitative assessment of sensor behavior is sufficient to determine its OPERABILITY and acceptability for continued use.

Section 2.0

none

Section 3.0

L1 CTS 3.0 does not include a provision equivalent to ITS 3.0.5 which allows returning equipment to service under administrative control, solely to perform testing to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to ITS 3.0.2. It allows certain equipment to be restored to OPERABLE status while continuing to comply with ACTIONS associated with the LCOs, thus avoiding a plant shutdown. This allowance represents a stable, safe alternative to requiring a plant shutdown to complete restoration and confirmatory testing of equipment removed from service or declared inoperable. Because this provision is restricted to activities deemed necessary to restore equipment Operability, it is acceptable.

L2 CTS 4.0 does not include a provision equivalent to ITS SR 3.0.2, which states, "If a Completion Time requires periodic performance on a "once per..." basis, the above Frequency extension applies to each performance after the initial performance." The purpose of ITS SR 3.0.2 is to allow the "1.25 times the interval specified in the Frequency" concept to apply to periodic Completion Times associated with Actions. This provides consistency in scheduling flexibility for all performances of periodic requirements, whether they are Surveillances or Required Actions. The activity is still

performed, on the average, once during each specified interval. Therefore, this is an acceptable less restrictive change.

Section 3.1

L2 CTS 3.1.3.3 requires that the reactor be made subcritical by an amount greater than or equal to the potential reactivity insertion due to depressurization if the Moderator Temperature Coefficient (MTC) is outside the limits provided in the Core Operating Limit Report (COLR). No completion time is stated. CTS 3.0 requires hot shutdown be achieved within 8 hours. ITS 3.1.3 Action A.1 requires establishment of administrative withdrawal limits for control banks to maintain MTC within the upper limit with a completion time of 24 hours if MTC is not within the upper limit. If ITS 3.1.3 Action A.1 is satisfied, no further action is required. The CTS does not preclude establishment of administrative withdrawal limits for control banks to maintain MTC within the upper limit. However, the completion time of 24 hours allowed by the ITS is less restrictive than the 8 hours permitted by the CTS.

If ITS 3.1.3 Action A.1 is not met, ITS 3.1.3 Action B.1 requires being in MODE 2 with K_{eff} < 1.0 within 6 hours. This completion time is in addition to the 24 hours permitted by ITS 3.1.3 Action A.1 and is less restrictive than the 8 hours permitted by CTS.

(A specific Completion Time for CTS 3.1.3.3 to restore MTC to within the upper limit.) In order to place the plant in a non-applicable MODE, evaluating the MTC measurement and obtaining the necessary input to compute the bank withdrawal limits for MTC limit compliance may require a time period longer than 8 hours. The ITS 3.1.3 Action A.1 completion time of 24 hours provides sufficient time for evaluating the MTC measurement and computing the required bank withdrawal limits. Additionally, the 24-hour Completion Time is based on the low probability of an accident occurring during this period and takes into consideration the fact that as cycle burnup is increased, reactor coolant system (RCS) boron concentration is reduced which causes MTC to become more negative. This reduces plant shutdown transients while in a condition where unit response during postulated events may not be as predicted. The change provides a specific action and completion time for failing to satisfy the LCO. This is an acceptable less restrictive change.

L5 CTS 3.1.3.3 requires that the reactor be made subcritical by an amount greater than or equal to the potential reactivity insertion due to depressurization if the MTC is outside the limits provided in the COLR. No completion time is explicitly stated. CTS 3.0 requires hot shutdown be achieved within 8 hours. ITS 3.1.3 Action C.1 requires being in MODE 4 with a completion time of 12 hours if MTC is not within the lower limit. The completion time allowed by the ITS is greater than the 8 hours permitted by CTS 3.1.3.3. This change allows for a more controlled shutdown which reduces thermal stress on components and also reduces the chances for a plant transient which could challenge safety systems. This is an acceptable less restrictive change.

L6 CTS 3.10.1.5 actions associated with a misaligned rod are required to be taken within 2 hours if the rod position indication requirements of CTS Table 4.1-1 items 9 and 10 are not satisfied. The rod position indication instruments do not necessarily relate directly to rod OPERABILITY (e.g., rods aligned within limits) or the ability to maintain rods within alignment limits. Because of this, ITS 3.1.7 is added to require the Analog Rod Position Indication (ARPI) System and the Demand Position Indication System to be OPERABLE

in MODES 1 and 2 and provide alternate Actions to determine rod position or reduce power to ≤ 50% RTP in the event of inoperable rod position indication. Reducing power to ≤ 50% RTP puts the core into a condition where rod position is not significantly affecting core peaking factors. The ITS 3.1.7 Actions are modified by a Note which allows separate Condition entry for each inoperable rod position indicator per group and each demand position indicator per bank. The ITS 3.1.7 Actions and the Completion Times contained in ITS 1.3 provide appropriate compensatory actions for each inoperable position indicator. There is a low probability of having a rod significantly out of position and an event sensitive to that rod position during the time period allowed to either implement an alternate method of determining rod position or reducing power to a level where rod position does not significantly affect core peaking factors. Any reduction in a margin of safety resulting from the proposed change will be offset by the potential benefit gained by avoiding an unnecessary plant power reduction or shutdown transient when alternate means exist to determine rod position. The change eliminates the requirement to consider rods to be misaligned when rod position indication is inoperable by providing an LCO and associated ACTIONS for rod position indication. This is an acceptable less restrictive change.

Section 3.2

L7 CTS 3.10.2.9 allows calibration of the excore detectors if the axial flux difference (AFD) is within the target band for > 90% rated power, and if the AFD does not exceed the limits specified in the COLR for reactor power between 50% and 90% rated power. ITS 3.2.3 Applicability Note allows up to 16 hours of operation to be accumulated with AFD outside the target band without penalty deviation time while the excore detectors are being calibrated. Some deviation from the target band is necessary to perform the calibration of the excore detectors. The duration that the AFD will be outside the target band for the purposes of excore detector calibration is sufficiently low to provide reasonable assurance that the overall effect on the axial peaking factor and axial xenon distribution will not impact the consequences of analyzed accidents. The process of the incore excore calibration involves inducing short-term axial power deviations in alternating directions in order to develop a plot of excore detector response. Since the axial power deviations are alternated, the overall effect on axial xenon distribution is small. As such, any reduction in the margin of safety will be insignificant and offset by the benefit of avoiding an unnecessary change in Thermal Power during the calibration process. Some deviation from the target band is necessary to perform the calibration, and the axial offsets that are used to calibrate the excore detectors alternate between a plus and minus axial offset, such that the overall effect is small. This is an acceptable less restrictive change.

Section 3.3

L1 The CTS is revised to adopt the "ALLOWABLE VALUE" column from ISTS Table 3.3.1-1 and Table 3.3.2-1. This limit includes allowances for calibration tolerances, instrument uncertainties, instrument drift, and errors due to severe environmental conditions for RPS and ESFAS channels that must function in a harsh environment. The Allowable Values specified in Table 3.3.1-1 and Table 3.3.2-1 are conservatively set with respect to the analytical limits. In establishing these allowable values, some have been determined to be less conservative than the CTS trip setpoint limits. The ITS limits for power range neutron flux (high and low), $OT\Delta T$, $OP\Delta T$, low pressurizer pressure, and RCS loop low flow result in a less conservative requirement for declaring channels inoperable.

However, because the actual nominal trip setpoint (operational limit as opposed to the TS limit) is still more conservative than that specified by the Allowable Value to account for changes in random measurement errors, such as drift during a surveillance interval, these changes are acceptable. Setpoints set in accordance with the Allowable Value ensure that safety limits are not violated during abnormal operational occurrences (AOOs), and that the consequences of design basis accidents (DBAs) will be acceptable, providing the unit is operated from within the LCOs at the onset of the AOO or DBA and the equipment functions as designed. The Allowable Values listed in Table 3.3.1-1 is the Limiting Safety System Setting as defined by 10 CFR 50.36. The Allowable Values listed in Table 3.3.1-1 and Table 3.3.2-1 are conservatively set with respect to the analytical limits, and are based on the methodology described in the company setpoint methodology procedure. The magnitudes of uncertainties are factored into the determination of each trip setpoint. All field sensors and signal processing equipment for these channels are assumed to operate within the allowances of these uncertainty magnitudes. This change is consistent with STS.

L2 CTS 2.3.1.2.d and 2.3.1.2.e set the values of certain $OT_{\Delta}T$ and $OP_{\Delta}T$ parameters as being "=" to specific values. ITS Table 3.3.1-1, Notes 1 and 2, set these same parameters as being either "$\geq$" or "$\leq$" specific values. This is a relaxation of current TS requirements, and is less restrictive in that the ITS specifies a range of values, not previously permitted, as meeting TS requirements. This change is acceptable, however, because these parameter settings only permit the use of a more conservative setpoint in the plant hardware. Although these parameters normally do not change, they are cycle-specific and may change from time to time as a result of evaluations performed in the review of refueling safety analyses. This change is consistent with STS.

L7 The CTS is revised to adopt STS Specification 3.3.1, Required Action D.2.2 "Note." CTS Table 3.5-2, Action 2, requires that the Quadrant Power Tilt Ratio (QPTR) be monitored every 12 hours. This is required when Nuclear Flux Power Range channels are inoperable but only if thermal power is not restricted to less than 75% RTP and the Power Range Neutron Flux channel setpoints are not reduced to less than or equal to 85% of RTP within 4 hours. The ITS Required Action D.2.2 Note requires only that the QPTR surveillance be performed when the Power Range Neutron Flux QPTR input is inoperable. This is a relaxation of CTS remedial actions for TS requirements, and is less restrictive. This change is acceptable because failure of a component in the Power Range Neutron Flux channel which does not render the High Flux Trip Function inoperable does not affect QPTR monitoring capability. As such, performing the CTS surveillance using the movable incore detectors, when the Power Range Neutron Flux input is operable, is unnecessary. Therefore, the SR can be eliminated. This change is consistent with STS.

L9 The CTS is revised to adopt STS Specification 3.3.1 Required Action G in the ITS. The CTS has no specific action requirements in the event two Intermediate Range Neutron Flux channels become inoperable when the unit is operating at a Thermal power >P-6 and <P-10. CTS Section 3.0 would therefore be entered, requiring the unit to be in hot shutdown in 8 hours and in cold shutdown within the next 30 hours or the reactor placed in a non-applicable Mode or condition. STS Required Action G requires, under these conditions, that operations involving positive reactivity additions be suspended immediately, and Thermal

power be reduced to <P-6 in 2 hours (i.e., placing the plant in a non-applicable condition). Below P-6, STS Required Action H.1 requires restoration of two inoperable Intermediate Range Neutron Flux channels prior to increasing power above the P-6 interlock. This change is acceptable, however, because with no intermediate range channels Operable, Required Action G.1 is added to immediately suspend operations involving positive reactivity additions. This will preclude any power level increase when the ability to monitor neutron flux is not available (above the P-6 setpoint and below the P-10 setpoint, the intermediate range performs the neutron flux monitoring function). Power must also be reduced below the P-6 setpoint within 2 hours (Required Action G.2). Below P-6, the Source Range Neutron Flux channels (STS Table 3.3.1-1 Function 4) are required to be Operable and will be able to monitor neutron flux. Therefore, since adequate neutron flux monitoring capability and trip capability is provided by the Source Range Neutron Flux channels and positive reactivity additions are required to be suspended, it is not necessary to require a plant shutdown in accordance with CTS 3.0. This change is consistent with STS.

L27 CTS Table 4.1-1 requires that the power-operated relief valve (PORV) Position Indication, PORV Block Valve Position Indicator, and Safety Relief Valve Position Indicator, Containment Level, Pressure, Hydrogen and Radiation Monitors be tested at an "R" Frequency. ITS Specification 3.3.3 has no such requirement. This is a relaxation of requirements and is less restrictive. This change is acceptable, however, because a channel calibration is performed on these channels at an 18-month frequency. The channel calibration encompasses all the testing requirements for these Functions, from sensor to indicator, and provides reasonable assurance that the entire channel is operable. This change is consistent with STS.

L30 CTS 3.5.1 is revised to adopt the STS Specification 3.3.5 "Note" to Required Action B.1 in the ITS. The Note permits an inoperable Degraded Voltage Function channel to be bypassed for up to 4 hours for surveillance testing of other channels. Adoption of this Note is a relaxation of requirements, and is therefore less restrictive. This change is acceptable, however, because there are three Degraded Voltage channels per bus, and this allowance is given where bypassing the channel does not cause an actuation, and where at least two other channels per bus are monitoring the parameter. The Degraded Voltage Function is arranged in a two-out-of-three configuration. Bypassing one channel would still provide a two-out-of-two logic. The time allowed is reasonable, considering the Function remains fully operable on each bus and the low probability of an event occurring during the interval. This change is consistent with STS.

L32 CTS Table 3.4-1, Function 1, requires under certain channel inoperability conditions that the unit be maintained in hot shutdown. ITS 3.3.8, Required Action B, requires under similar conditions, that the inoperable channel be placed in trip in 6 hours, or be in Mode 3 in 12 hours, and MODE 4 in 18 hours. This is a relaxation of requirements, and is less restrictive. This change is acceptable, however, because placing the inoperable channel in trip maintains the AFW pump autostart Function Operable, but in a one-out-of-two configuration, instead of two-out-of-three. The allowance of 6 hours to return the channel to operable status or place it in trip is consistent with WCAP-10271-P-A, Supplement 2, Rev. 1, June 1990. This change is consistent with STS.

As required by the staff Safety Evaluation (dated April 30, 1990) accepting the generic reliability analysis in WCAP-10271-P-A, Supplement 2, Rev.1, CP&L has confirmed that the HBR logic design of the affected instrumentation is bounded by that analyzed in the reliability analysis and the conclusions are applicable to the HBR design. In addition, CP&L has confirmed that the instrument drift due to extended Surveillance Frequencies, associated with application of the generic reliability analysis to the HBR instrumentation, is already properly accounted for in the setpoint calculation methodology.

L36 CTS Table 3.5-2 Action 3 requires for an inoperable intermediate range neutron flux channel with thermal power above the P-6 setpoint, but below 10% RTP, that the inoperable channel be restored to operable status prior to increasing thermal power above 10% RTP. ITS 3.3.1 Required Action F requires for an inoperable intermediate range neutron flux channel with thermal power above the P-6 setpoint, but below the P-10 setpoint, that thermal power either be reduced to below P-6 or increased above P-10 in 2 hours. The intermediate range neutron flux channels must be operable when the power level is above the capability of the source range and below the capability of the power range. The CTS does not permit an increase in power level to exit the Applicability of the intermediate range detectors. The required action to increase thermal power to exit the Applicability for the intermediate range detectors is less restrictive. The change is acceptable since the intermediate range detectors are not required to be operable above P-10 setpoint, and power range instrumentation provides the necessary protection above P-10 and this allowance represents exiting the LCO Applicability. This change is consistent with STS.

L41 This change adds a Note to the calibration requirement in CTS Table 4.1-1 for Items 1, 2, and 3 (Nuclear Power Range, Nuclear Intermediate Range, and Nuclear Source Range) excluding the neutron detectors from this Surveillance (ITS SR 3.3.1.11). The channel calibration is a complete check of the instrument loop and the sensor. The test verifies that the channel responds to the measured parameter within the necessary range and accuracy. The neutron detectors are excluded from the channel calibration because they are passive devices, with minimal drift, and because of the difficulty of simulating a meaningful signal. This change is consistent with industry practice and with STS.

L50 CTS Table 3.5-3 does not address the condition of all channels of an ESFAS Instrumentation Function inoperable or a train of ESFAS Instrumentation inoperable. Due to the plant design, maintenance or surveillance testing of a single channel can not be performed without causing all channels of the associated Function to be inoperable. In many cases, maintenance or surveillance testing will also cause the associated train to be inoperable. Therefore, ITS 3.3.2 Required Actions Note 2 is adopted to permit a single ESFAS instrumentation train to be inoperable for the purpose of maintenance or surveillance testing for up to 12 hours provided the other train is Operable. The Note also specifies that the provision does not apply to manual actuation Functions.

Currently, all Functions of an associated ESFAS train are tested at one time. The procedure for performing testing does not result in the entire train being made inoperable. However, each of the Functions within an ESFAS train are made inoperable for short periods of time until testing of all channels of the associated ESFAS train is completed. Repetitive action entry and exit during testing of the associated ESFAS train, on a per Function basis, represents an unnecessary administrative burden on the plant operations staff and would result in extending the time period required to complete the testing.

Therefore, a single time period is provided to cover all testing of the associated ESFAS train.

For repair or replacement of Engineered Safeguard System relays and/or test switches, 12 hours has been determined to be a reasonable Completion Time for restoration of the two most frequently occurring types of failures that occur in the HBR Engineered Safeguards System. These two failures are 1) failure of a logic or actuation relay, and 2) failure of the test switches used for the performance of the surveillance testing. A failure of either of these items only causes one portion of the Engineered Safeguards System to be inoperable, but due to the wiring configuration of the system (the common side of the relay power source is "daisy chained" together) the entire train must be considered inoperable once maintenance on the failed item has commenced. In addition, with the test switches in "test" during surveillance testing, all channels in an ESFAS Instrumentation Function are rendered inoperable.

The change to provide 12 hours for the performance maintenance or surveillance testing on an ESFAS instrumentation train is acceptable based on the other ESFAS instrumentation train that is available to perform the actuation function and the low probability of an event requiring an ESFAS actuation. In addition, the change provides the potential benefit of the avoidance of a plant shutdown transient by providing a time period to perform required surveillance testing or necessary maintenance prior to requiring a plant shutdown.

Section 3.4

L1 ITS 3.4.5 "Note," ITS 3.4.6 "Note 1," and ITS 3.4.7 "Note 1" permit all reactor coolant pumps (RCPs) or residual heat removal (RHR) pumps to be de-energized for up to 1 hour in any 3-hour period to permit tests designed to validate various accident analyses values. This exception is not addressed in the CTS. This change is acceptable, however, because such an operation would be performed as part of a special test, and be controlled under close scrutiny by shift operating personnel. In addition, the allowances of the Notes may only be used if no operations which could cause a reduction of RCS boron concentration are being performed, core outlet temperature is maintained at least 10 degrees F below saturation temperature, and for ITS 3.4.5 and 3.4.6 measures are taken to preclude a power excursion resulting from an inadvertent control rod withdrawal event (the Rod Control System is incapable of rod withdrawal). Industry operating experience has shown boron stratification is not a problem during a 1-hour period with no forced flow and natural circulation in conjunction with the core outlet temperature restriction discussed above ensure the core remains adequately cooled. For the above reasons this change is acceptable.

L4 CTS 3.3.1.4.b requires that, if both RHR loops become inoperable, all containment penetrations providing direct access from the containment atmosphere to the outside atmosphere be closed prior to the RCS average temperature exceeding 200°F. This requirement is not retained in ITS 3.4.7 and 3.4.8. This is a relaxation of requirements, and is less restrictive. This change is acceptable because ITS 3.4.7 and 3.4.8, unlike the CTS, require action be initiated immediately to restore one RHR train to OPERABLE status and operation. Further, to preclude any change in the shutdown margin and in turn any increased possibility of a radioactive release, the ITS suspends all operations involving the reduction in RCS boron concentration.

L5 The CTS is revised to adopt ITS 3.4.7 "Note 2," and ITS 3.4.8 "Notes 1 and 2." ITS 3.4.8 Note 1 permits all RHR pumps to be de-energized for up to 15 minutes when switching from one train to another or to perform testing of the RHR loop supply valves. Note 2 allows one RHR train to be inoperable and deenergized (for ITS 3.4.7 Note 2) for a period of up to 2 hours. These are relaxations of requirements because CTS does not contain these exceptions, and they are therefore less restrictive. The changes are acceptable, however, because the circumstances for stopping both RHR pumps are limited to situations when the outage time is short and core outlet temperature is maintained > 10°F below saturation temperature. Boron dilution and draining operations are prohibited when RHR forced flow is stopped thus reducing risk of boron stratification. An RHR train is only permitted to be inoperable for a period of 2 hours provided the other train is OPERABLE. Additionally, these exceptions provide the added safety benefit of permitting periodic surveillance tests to be performed on the inoperable train during the only time when these tests are safe and possible.

L6 CTS 3.3.1.4 requires that both RHR loops be OPERABLE in the cold shutdown condition. ITS 3.4.7 requires, when in MODE 5 with the RCS loops filled, that either both RHR trains be OPERABLE and one in operation, or one RHR train OPERABLE and in operation and one SG be OPERABLE. This change is less restrictive because both trains of RHR are not required to be OPERABLE at all times during MODE 5. This change is acceptable, however, because in either ITS configuration (as in the CTS), redundant decay heat removal systems are required to be OPERABLE and available for use.

L7 CTS 3.1.1.3.c.1 requires that pressurizer code safety valve lift settings be between 2485 psig and 2560 psig. ITS 3.4.10 requires that safety valve lift settings be between 2410 psig and 2560 psig. This is a relaxation of requirements and is less restrictive. This change is acceptable, however, since the same level of overpressure protection is provided. The wider OPERABILITY range of 2485 psig $\pm$ 3% allows for drift during valve setpoint test intervals, as permitted by Section III of the ASME Code. During setpoint testing, the valves are reset to 2485 psig $\pm$ 1%, as required by Section XI of the ASME Code.

L8 CTS 3.3.1.3 requires that the safety injection (SI) pump breakers be racked out when RCS temperature is below 350°F and the system is not vented to containment atmosphere. ITS 3.4.12.a.2 requires all but one SI pump be made incapable of injecting into the RCS when the RCS temperature is $\geq$ 175°F. This is a relaxation of requirements, and is less restrictive. This change is acceptable based on a new overpressure protection analysis performed to allow OPERABILITY of one train of SI in MODE 4. The analysis assumes one SI pump capable of injection into the RCS with RCS temperature $\geq$ 175°F and < 350°F.

L9 Not Used. [L DOC Matrix includes L.9 as in the "none" category.

L12 CTS 3.1.5.4.b requires that, with leakage from any pressure isolation valve (PIV) not within limits, operation may continue provided at least two valves are confirmed to be in, and remain in, the position corresponding to the isolated condition. ITS 3.4.14 requires isolation of the high pressure line by a single valve within 4 hours, followed with isolation of the line by a second valve within 72 hours. This is a relaxation of requirements and is less restrictive. This change is acceptable, however, because although the CTS requires both valves to be closed essentially simultaneously, it does not specify a completion time limit for the required actions. The extended interval is also acceptable because it is

based on the time usually required to perform this action and considers the low probability of another valve failing during this period.

L13 CTS Table 4.1-3, Item 17.1, requires PIV leakage be verified prior to entering reactor operation whenever the unit has been in cold shutdown for 72 hours. ITS 3.4.14 requires PIV leakage be verified whenever the unit has been in MODE 5 for 7 days or more. Since the result of this change is a net reduction in the number of times PIV leakage verification will be required over the remaining life of the plant, it is a relaxation of requirements and is less restrictive. This change is acceptable, however, since PIV leakage verification is performed routinely at an 18-month frequency, and historical leakage verification experience has shown the PIVs usually pass the surveillances when performed at that frequency. Further, any maintenance performed on a PIV while the plant is in cold shutdown for any length of time is required to be followed up with the appropriate post-maintenance testing. Consequently, extending the shutdown period for which the testing exception will apply should have little impact on safety.

L17 CTS 3.3.1.4.a requires, in the event of an inoperable RHR loop, the existence of a method to add make-up water to the RCS be verified within 24 hours, and the inoperable RHR loop be restored to operable status within 14 days. ITS 3.4.7 and 3.4.8 each require action be initiated immediately to restore a second RHR train to operable status. This change imposes less restrictive requirements because in the ITS there are no time requirements within which the inoperable RHR train is to be restored nor are there any requirements to verify a method to add make-up water. These changes are acceptable because while the specific action times are removed, an immediate completion time is added. As discussed in ITS 1.3, when an "Immediately" is used as a Completion Time, the Required Action should be pursued without delay and in a controlled manner. The substitution of a requirement that results in immediate action in place of two requirements which would allow action to be delayed for hours and days, respectively, has been determined to provide an acceptable level of safety.

L20 The CTS is modified by the addition of ITS 3.4.17, Required Actions D.1, D.2, and D.3 to require that in the event that seal injection to any RCP is not within limits and both required charging pumps are inoperable, then the plant must be cooled down and depressurized to an RCS pressure < 1400 psig. No comparable action is contained in the CTS. In such a condition, the CTS would require entry into CTS 3.0 which requires that the plant be placed in hot shutdown within 8 hours and in cold shutdown within an additional 30 hours. Therefore, the ITS requirement to reduce reactor pressure to below 1400 psig is a less restrictive requirement. The changes, however, are acceptable. Depressurizing the reactor to < 1400 psig would allow the SI pumps to perform the RCS makeup function during the repair period to restore charging pumps to operable status. With RCS inventory controlled in such a manner, there would not be a need to proceed to a shutdown mode. If at anytime, seal failure(s) increased plant leakage above the limit of ITS 3.4.13 "RCS Operational LEAKAGE," then the failure to comply with these limits would require the plant to be placed in cold shutdown in a time period consistant with CTS requirements, thereby assuring adequate protection of public health and safety.

L21 CTS 3.2.2.d requires system piping, instrumentation, controls, and valves be operable to the extent of establishing one flow path from the BASTs and one flow path from the RWST to the RCS. That is modified in ITS 3.4.17 to require two operable Makeup Water Pathways from the RWST. This change is acceptable because it assures that there are two pathways available from the RWST to the charging pump suction header, each of

which provides an adequate source of makeup for RCP seal injection. Further, removal of the requirements for one flow path from the BASTs is acceptable because, boration flow paths are not required to prevent or mitigate the consequences of any accident analyzed as part of the plant design basis.

L24 CTS Table 4.1-3 item 17.2 requires, whenever the integrity of a RCS pressure isolation valve cannot be demonstrated, the integrity of the remaining valve to be determined and recorded daily. In this condition, CTS Table 4.1.3 item 17.2 also requires that the position of the other closed valve located in the high pressure piping to be recorded daily. Under this same condition, ITS 3.4.14, RCS Pressure Isolation Valves (PIVs), Required Actions A.1 and A.2 require isolation of the high pressure portion of the piping from the low pressure portion of the piping by the use of two valves. In addition, ITS 3.4.14 Required Actions A.1 and A.2 are modified by a Note that requires the valves used to meet the requirements of Required Actions A.1 and A.2 to satisfy the leakage criteria of SR 3.4.14.1 (i.e., integrity determined to be acceptable) and that the valves be in the reactor coolant pressure boundary or high pressure portion of the piping. This is less restrictive because the ITS does not require daily determinations and recordings of valve integrity. However, this change is acceptable because with two valves providing the isolation the normal periodic surveillance frequency (ITS SR 3.4.14.1) for RCS PIV leakage testing provides adequate assurance of PIV OPERABILITY. While during the surveillance interval it would be possible that both valves could lose their integrity, that is very unlikely. If the Surveillance is not performed within the normal surveillance interval, compliance with the requirements of the Note to Required Actions A.1 and A.2 would not be satisfied for these valves and a shutdown per Required Actions C.1 and C.2 would be required (i.e., action taken to exit the Applicability of the LCO). If at any time it is discovered that the valves used to comply with Required Actions A.1 and A.2 did not satisfy the requirements of SR 3.4.14.1, Condition C must be immediately entered and Required Actions C.1 and C.2 taken.

Section 3.5

L3 CTS 4.5.1.1 requires the SI System tests be performed in such a manner to prevent injection into the reactor coolant system. This requirement is not retained in the ITS. It is expected future testing will be consistent with current methodology which does not result in actual injection. Testing which results in actual injection is acceptable since the test would still demonstrate acceptable system operation. This change is consistent with the STS.

L4 CTS 4.5.1.2 specifies certain details regarding test method (e.g., control board indications and visual observation, proper sequence and timing, etc.) regarding acceptable SI System test results. These test method details are not retained in ITS. The ITS-specified verification of pump starts and valve actuations is sufficient to demonstrate OPERABILITY. This change allows increased flexibility in testing methodology while still requiring verification of OPERABILITY. This change is consistent with STS.

L5 CTS 4.5.2.1 mandates a test method for the verification of the specified valve positions. Specifically, this specification requires verification ". . . from the RTGB indicators/controls . . ." that the specified valves are in the proper position with control power removed. This test method detail is not retained in ITS. The ITS SR 3. ..1 specified verification that the valves are in their proper position with control power removed is sufficient to demonstrate OPERABILITY. This change allows increased flexibility in testing

methodology while still requiring verification of OPERABILITY. This change is consistent with the STS.

L6 In Hot Shutdown, CTS 3.3.1.3 imposes requirements for ECCS in accordance with CTS 3.3.1.1 and 3.3.1.2. CTS 3.3.1.1 requires two ECCS trains to be operable. CTS 3.3.1.2 permits one ECCS component (SI pump, RHR pump, RHR heat exchanger) to be inoperable for up to 24 hours. With less than one ECCS train OPERABLE, no specific action is provided. In this condition, entry into CTS 3.0 is required. CTS 3.0 requires the unit be placed in Cold Shutdown within 30 hours. ITS 3.5.3 requires only one ECCS train to be OPERABLE in MODE 4. With the required ECCS RHR subsystem inoperable, ITS 3.5.3 Required Action A.1 requires action be initiated immediately to restore one required ECCS RHR subsystem to OPERABLE status. This change is consistent with the STS.

Due to the stable conditions associated with operation in MODE 4 and the reduced probability of occurrence of a DBA, the ECCS operational requirements are reduced. With both RHR pumps and heat exchangers inoperable, it would be unwise to require the plant to go to MODE 5, where the only available heat removal system is the RHR. Therefore, the appropriate action is to initiate measures to restore one ECCS RHR subsystem and to continue the actions until the subsystem is restored to OPERABLE status.

L7 With the RWST boron concentration not within limits, CTS-required action is specified in 3.0. CTS 3.0 requires achieving hot shutdown within 8 hours, followed by cold shutdown within an additional 30 hours. ITS 3.5.4 Required Action A.1 permits 8 hours to restore the RWST to OPERABLE status. With Required Action A.1 and its associated completion time not met, ITS Required Actions C.1 and C.2 require achieving MODE 3 within 6 hours, and MODE 5 within 36 hours.

The 8 hours to restore the boron concentration to within limits is acceptable based upon consideration of the time required to change the boron concentration and the fact that the contents of the tank are still available for injection. Permitting prompt corrective action to restore the boron concentration to within limits is preferable to requiring immediate plant shutdown, with the increased risk for a plant transient. This change is consistent with the STS.

L8 A CTS provision comparable to the Note to the Applicability of ITS Specification 3.5.2 does not exist. This ITS Note permits one ECCS train to be inoperable for up to four hours after entry into MODE 3 or until the RCS cold leg temperatures exceed 375°F, whichever comes first. Operation in MODE 3 with one ECCS train declared inoperable pursuant to LCO 3.4.12, "Low Temperature Overpressure Protection (LTOP) System," is necessary for plants with an LTOP arming temperature at or near the MODE 3 boundary temperature of 350°F. LCO 3.4.12 requires that certain pumps be rendered inoperable at and below the LTOP arming temperature. When this temperature is at or near the MODE 3 boundary temperature, time is needed to restore the inoperable pumps to OPERABLE status. This Note permits entry into MODE 3 without first meeting the LCO requirements. The limitations imposed on duration and cold leg temperatures are bounded by the 72 hours permitted by ITS 3.5.2 Required Action A.1 for one ECCS train being inoperable when in MODES 1, 2 and 3. This change is consistent with the STS.

Section 3.6

L1 CTS 3.6.1.c and d contain unique requirements.

CTS 3.6.1.c limits positive reactivity changes by rod drive motion when containment integrity is not intact except during specified evolutions. During the specified evolutions SDM is limited to ≥ 1% Δk/k. CTS 3.6.1.d limits positive reactive changes made by boron dilution when containment integrity is not intact. The limitations are not retained in ITS. ITS 3.1.1 directly limits SDM and ITS 3.9.1 directly limits SDM by imposing a limit on boron concentration independent of containment status. Limiting positive reactivity changes which do not challenge the required SDM is unnecessary, since the specified SDMs are the minimum values assumed in the applicable safety analysis. This less restrictive change eliminates unnecessary restrictions on plant operation and is acceptable.

L2 CTS requirements comparable to ITS 3.6.3 ACTION Note 1 do not exist. ITS 3.6.3 ACTION Note 1 permits an INOPERABLE penetration flow path to be unisolated intermittently under administrative control. This is a less restrictive requirement upon plant operation. Permitting intermittent unisolation of an inoperable penetration under administrative control may be required in order to meet other Surveillance Requirements, and the Note is not intended to allow circumvention of the Completion Times. An example of when the capabilities afforded by this Note may be utilized is temporarily unisolating a sample flow path to acquire a required sample.

L6 CTS 3.3.2.2.a permits a containment cooler or flow path to be inoperable provided both containment spray pumps are OPERABLE. This restriction regarding OPERABILITY of the two containment spray pumps is not retained provided the four containment coolers are OPERABLE. This restriction regarding OPERABILITY of the four containment coolers is not retained in ITS. ITS 3.6.6 R.A A.1 and R.A C.1 permit a containment cooling unit associated with the same train to be inoperable simultaneously without regard to other systems OPERABILITY. These are less restrictive requirements upon plant operation.

The combination of ITS Condition A and Condition C is bounded by failure of a single emergency diesel generator (EDG). A failure of a single EDG results in loss of one containment spray train and one containment cooling train. ITS Condition A and Condition C are both predicted upon a short-term relaxation of the single failure criteria (i.e., for the duration of the Completion Time of the applicable ACTION, no additional single failure is assumed). One containment spray train in combination with one train of containment cooling provides sufficient heat removal capacity to maintain containment peak pressure and temperature below the design limits. Additionally, the iodine removal capability remains consistent with the assumptions of the accident analysis. The individual Completion Times were developed taking into account the redundant heat removal capabilities afforded by combinations of the Containment Spray System and Containment Cooling System and the low probability of DBA occurring during this period.

Section 3.7

L1 CTS 3.4.1.a requires 12 main steam safety valves (MSSVs) OPERABLE. ITS 3.7.1 requires MSSVs OPERABLE as specified in ITS Tables 3.7.1-1 and 3.7.1-2. Table 3.7.1-1 permits fewer MSSVs to be OPERABLE at reduced power levels. This is a relaxation of CTS requirements which is less restrictive. This change is acceptable, however, because Section III of the American Society of Mechanical Engineers (ASME) Boiler and

Pressure Vessel Code permits operation with fewer than 12 MSSVs OPERABLE as long as THERMAL POWER is limited to the relief capacity of the MSSVs remaining OPERABLE. This is accomplished by restricting THERMAL POWER so the energy transfer to the most limiting steam generator is not greater than the available relief capacity in that steam generator. Such limitations are specified in ITS Table 3.7.1-1.

L2 CTS 3.4.1 requires the plant to be shut down if the requirements for OPERABILITY of the MSSVs are not met within 24 hours. A Note to ITS Action 3.7.1 is added that allows separate condition entry for each MSSV. Since the CTS has no provision to increase the allowed outage time when one MSSV becomes inoperable after another, this change is less restrictive. This change is acceptable because ITS 3.7.1 Required Action A.1 allows only 4 hours for THERMAL POWER reductions to maintain the steam generator stored energy below the available relief capacity. Separate condition entry for each inoperable MSSV is necessary to allow the use of ITS Table 3.7.1-2 and allows the orderly adjustment of THERMAL POWER in response to the Required Actions.

L5 ITS 3.7.4 Required Action E.1 and Note include requirements for three inoperable AFW pumps or four inoperable AFW flow paths. CTS 3.4.5 has no specific required action to address the inoperability of all three AFW pumps and essential features. Hence, those conditions would result in entry into CTS 3.0 and the required action is to place the plant in hot shutdown in 8 hours and cold shutdown within an additional 30 hours. Because the addition of ITS 3.7.4 Required Action E.1 allows continued operation until at least one pump and flow path of AFW is restored to OPERABLE status, this change is less restrictive. This change is acceptable, however, because it is appropriate to restore at least one pump and flow path of AFW to OPERABLE before placing the unit in conditions where AFW is required to provide inventory to the steam generators.

L12 The CTS 3.15.2.b requirement suspending any operation which would reduce shutdown margin to less than required for cold shutdown or refueling is not retained in the ITS. This is a relaxation of requirements, which is less restrictive. This change is acceptable, however, because ITS 3.7.10 is applicable specifically during the times during cold shutdown or refueling (CORE ALTERATIONS and movement of fuel assemblies) where radioactive releases could potentially occur. Those activities are suspended if both trains of control room emergency air temperature control are inoperable, thereby this eliminates any activities that could result in a release of radioactivity that might enter the control room.

Section 3.8

3.8.6

L7 CTS Surveillance Requirement 4.6.3.3 requires an annual equalization charge of each battery. This requirement is not retained in the ITS. An equalization charge is a special charge given a battery when non-uniformity in voltage or specific gravity has developed between cells. It is given to restore all cells to a fully charged condition using a charging voltage higher than the normal float voltage. Therefore, it is inappropriate to mandate an equalization charge at a set frequency. The ITS SRs provide appropriate verification of battery parameters. When the need for an equalization charge is indicated by battery parameters, an equalization charge is utilized to restore all cells to a fully charged condition. This is controlled by plant procedures, but required to keep the cells above the

Category A limits. Deleting the required annual equalizing charge on each battery is a less restrictive requirement upon plant operation, consistent with the STS.

L8 CTS Surveillance Requirement 4.6.1.5 requires testing the DG with a load between ≥650 kW and 2750 kW (110% of continuous load rating) for two hours of the 24-hour loaded run test. ITS SR 3.8.11 requires this load be maintained for ≥ 1.75 hours of the 24-hour loaded run test. The 2-hour duration specified in CTS Surveillance Requirement 4.6.1.5 cannot be exceeded in any 24-hour period. The ITS test duration of ≥ 1.75 hours confirms the DG OPERABILITY without exceeding the DG rating. The actual DG load during an accident will exceed the continuous load rating of 2500 kW for a period less than the specified test interval of 1.75 hours. This less restrictive change upon plant operation is consistent with the DG design requirements and increases safety.

Table 3.8.9-4

L9 CTS Table 4.1-3, item 18, requires testing the magnetic and thermal trip elements for the molded case circuit breakers supplying the automatic bus transfer (ABT) device associated with Auxiliary Feedwater header discharge valve to steam generator A, V2-16A, and Turbine Building Cooling Water isolation valve, V6-16C. ITS SR 3.8.9.2 requires verifying the trip capability (magnetic only) for both of these breakers. Circuit breakers with a higher current interrupt capability and no thermal trip have replaced the original circuit breakers. A circuit thermal protection device is provided at the motor contactor. Elimination of the testing of these thermal trip elements reflects the current plant configuration and is a less restrictive requirement upon plant operation.

Section 3.9

none

Section 4.0

L.1 CTS Specification 5.3.1.1 is revised by adopting the STS Specification 4.2.1 allowances for limited substitutions of filler rods and limited use of lead test assemblies in the ITS. This is relaxation of requirements and is less restrictive. This change is acceptable, however, because it provides specific recognition that reconstitution of a fuel assembly to replace damaged and leaking fuel rods is not considered to be an unreviewed safety question if the repaired fuel assembly constitutes a previously approved design. This change will not result in modifications to fuel assemblies that would have a significant effect on safety because of the necessity to justify such changes using an NRC-approved methodology. This requirement will confirm (a) conformance to existing design limits, and (b) that safety analyses criteria are met before operation during the next fuel cycle. This change provides flexibility for improved fuel performance and is consistent with Supplement 1 to Generic Letter 90-02, and STS.

CTS Section 5.0

5.2.2

L1 CTS 6.2.3f, which requires that an individual qualified in radiation protection procedures be on site when there is fuel in the reactor, is revised in ITS 5.2.2d to add a sentence which permits this position to be vacant for up to 2 hours to provide for unexpected

absences. This is a less restrictive requirement that is realistic since unexpected absences can, and do, occur. This change considers the unlikelihood of a radiological occurrence during the period of absence, and the added provision of ITS 5.2.2d requiring immediate action to fill the vacant position. This change is consistent with the STS.

L2 CTS 6.2.3h, which allows the operating shift complement to be one less than minimum requirement for up to 2 hours, is revised in ITS 5.2.2c to delete the word 'one.' This allowance for the absence of more than 'one' shift crew member is a less restrictive requirements that is realistic since unexpected absences can, and do, occur. The impact of the change is that it raises the threshold for reporting a less-than-full-complement condition as a violation of the ITS requirements. This change requires immediate action to fill the vacant position, and does not negate the requirement that such a condition shall not exceed 2 hours. Additionally, Footnote 1 to the Minimum Staffing Table in 10 CFR 50.54(m) permits temporary deviations from the required staffing numbers as established in the unit's Technical Specifications. This change is consistent with the STS.

L3 CTS 6.3.2 requires the "Manager - Operations" to hold, or have held, an SRO license, and, the "Manager - Shift Operations" to hold an SRO license. ITS 5.2.2f requires either the "Operations Manager" or the "Superintendent in charge of the operations shift crews" hold an SRO license. The Superintendent in charge of the shift crews is an off-shift manager reporting to the Operations Manager who can be delegated the Operations Manager duties. This is a less restrictive requirement. 10 CFR 55 requires that an individual directing the licensed activities of licensed operators hold an SRO license. The on-shift Superintendent Shift Operations (SSO), who is in command of the control room, meets this requirement. This change does not impact safety and is consistent with the STS.

Section 5.3

L4 CTS 6.3.3 requires the manager of the radiation protection function meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. ITS 5.3.1 requires that the manager of the radiation protection function meet or exceed the minimum qualifications of ANSI/ANS 3.1-1981. In addition to other requirements Regulatory Guide 1.8 specifies that this individual have at least 5 years experience in applied radiation protection, while ANSI/ANS 3.1-1981 requires only 4 years of such experience. This is a less restrictive requirement. An industry standard, ANSI/ANS 3.1-1981, reflects current qualification requirements for nuclear power plant personnel and is updated as necessary, based on operating experience and lessons learned throughout the commercial nuclear industry.

Section 5.6

L5 CTS 6.9.1.2.1 requires submitting the annual Occupational Radiation Exposure Report by March 1 of each year; ITS 5.6.1 requires submitting this report by April 30 of each year. CTS 6.9.1.2.3 requires submitting the annual Radiological Environmental Operating Report by May 1 of each year; ITS 5.6.2 requires submitting this report by May 15 of each year. These are less restrictive requirements. The reports cover the previous calendar year, and there is no requirement for the NRC to approve either report. Completion and submittal of the reports are not necessary to ensure safe operation of the unit during the additional time intervals provided by these changes. These changes are consistent with the STS.

L6 CTS 6.9.1.2.1 contains reporting requirements associated with the reactor coolant exceeding specific activity limits. These reporting requirements are not retained in ITS 5.6. This is a relaxation of requirements, which is less restrictive. These reporting requirements are specified in 10 CFR 50.73, and failure to return specific activity to within specification limits in the allotted time results in a unit shutdown and those related reporting requirements. This change is consistent with the STS.

L7 CTS 6.9.1.3, which requires submitting the Radioactive Effluent Release Report on a semiannual basis, is revised in ITS 5.6.3 to require submitting this report on an annual basis in accordance with 10 CFR 50.36a. This is a less restrictive requirement. This report covers the previous calendar year, and there is not a requirement for the NRC to approve the report. Completion and submittal of the report is not necessary to ensure safe operation of the unit during the additional 6 months. This change is consistent with the STS.

L8 CTS 6.9.1.4 requires submittal of the Monthly Operating Report to the NRC no later than the 10th of the month following the calendar month covered by the report. ITS 5.6.4 requires submitting this report by the 15th of each month. This is a less restrictive requirement. This report covers the previous month, and there is not a requirement for the NRC to approve the report. Completion and submittal of the report is not necessary to ensure safe operation of the unit during the additional 5 days. This change is consistent with the STS.

L9 CTS 4.2.1.3.2 requires including the complete results of the Steam Generator (SG) tube inservice inspection in the Operating Report for the period in which the inspection was completed. ITS 5.6.8b requires including the complete results of the steam generator tube inspection in the Monthly Operating Report for the period beginning after the inspection was completed. This is a less restrictive requirement. The current requirement can impose an unnecessary burden if the inspections are completed late in the reporting period; there would be little time to include inspection results in the report and obtain appropriate review and approval by the required completion date. Submitting the inspection results in the subsequent Monthly Operating Report is acceptable. This report is an after-the-fact report covering planned inspection activities, and there is no requirement for the NRC to approve these reports. Completion and submittal of the report is not necessary to ensure safe operation of the unit during the additional time interval provided by this change.

L10 CTS 6.9.3.1.a, which requires the submittal of a Containment Leak Rate Test Report to the NRC upon completion of each containment leak rate test, is not retained in ITS 5.5.16. The removal of a reporting requirement is a relaxation of requirements and is less restrictive. The removal of this reporting requirement is not necessary to ensure safe operation of the unit. This change is consistent with 10 CFR 50, Appendix J, Option B.

Conclusion

For the reasons presented above, these less restrictive requirements are acceptable because they will not affect the safe operation of the plant. The TS requirements that remain are consistent with current licensing practices, operating experience, and plant accident and transient analyses, and provide reasonable assurance that the public health and safety will be protected. 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 staff has concluded that they do not fall within any of the four criteria in the Final Policy Statement (discussed in Part II of this safety evaluation). Accordingly, existing detailed information and specific requirements, such as generally described above, may be deleted from CTS.

Relocated Less Restrictive Requirements

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

A significant number of changes to the CTS involved the removal of specific requirements and detailed information from individual specifications that can be adequately maintained in licensee-controlled documents, by applicable regulatory requirements. Such changes have been made to retained specifications that contained specific requirements and detailed information of the following general types:

Type 1	Details of system design and system description including design limits
Type 2	Descriptions of systems operation
Type 3	Procedural details for TS requirements and related reporting problems
Type 4	Performance requirements for indication-only instrumentation and alarms

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

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

The design of the facility is required to be described in the UFSAR by 10 CFR 50.34. In addition, the quality assurance (QA) requirements of Appendix B to 10 CFR Part 50 require that plant design be documented in controlled procedures and drawings, and maintained in accordance with an NRC-approved QA plan (UFSAR Chapter 17). In 10 CFR 50.59 controls are specified for changing the facility as described in the UFSAR, and in 10 CFR 50.54(a) criteria are specified for changing the QA plan. In ITS, the Bases also contain descriptions of system design. ITS 5.5.10 specifies controls for changing the Bases. Removing details of system design from the CTS is acceptable because this information will be adequately controlled in the UFSAR, controlled design documents and drawings, or the TS Bases, as appropriate Cycle-specific design limits are moved from the CTS to the Core Operating Limits Report (COLR) in

accordance with Generic Letter 88-16. ITS Administrative Controls are revised to include the programmatic requirements for the COLR.

Descriptions of Systems Operation **(Type 2)**

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

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

Details for performing action and surveillance requirements are more appropriately specified in the plant procedures required by ITS 5.4.1, the UFSAR, and ITS Bases. For example, control of the plant conditions appropriate to perform a surveillance test is an issue for procedures and scheduling and has previously been determined to be unnecessary as a TS restriction. As indicated in Generic Letter 91-04, allowing this control is consistent with the vast majority of other SRs that do not dictate plant conditions for surveillances. Prescriptive procedural information in an action requirement is unlikely to contain all procedural considerations necessary for the plant operators to complete the actions required. Such information in the TS could distract the plant operators from focusing on applying the appropriate plant operational or emergency procedure to accomplish the action requirement. Thus, removal of such information from the TS is potentially beneficial to safe operation of the plant during compliance with a TS action statement. In addition to the potential safety benefit, the removal of these kinds of procedural details from the CTS is acceptable because they will be adequately controlled in the UFSAR, plant procedures, and the Bases, as appropriate. In addition, removal of reporting requirements from LCOs is appropriate because ITS 5.6, 10 CFR 50.36 and 10 CFR 50.73 adequately cover the reports the staff deems necessary.

Performance Requirements for Indication-Only Instrumentation and Alarms **(Type 4)**

Indication-only instrumentation, test equipment, and alarms are usually not required to be operable to support TS operability of a system or component. Thus, with the exception of the Accident Monitoring instrumentation, STS generally contain no operability requirements for indication-only equipment. The availability of such indication instruments, monitoring instruments, and alarms, and necessary compensatory activities if they are not available, are more appropriately specified in plant operational, maintenance, and annunciator response procedures required by ITS 5.4.1. Removal of requirements for indication-only instrumentation and alarms from the CTS is acceptable because they will be adequately controlled in plant procedures.

Table RL lists specific CTS details that are relocated to licensee-controlled documents in ITS. Table RL is organized by ITS section discussion of change and provides a CTS reference, a summary description of the item, the name of the document that retains the CTS requirements,

the method for controlling future changes to relocated requirements, a characterization of the change including a type of change reference.

Conclusion

The staff has concluded that these types of detailed information and specific requirements are not necessary to ensure the effectiveness of ITS to adequately protect the health and safety of the public. Accordingly, these requirements may be moved to one of the following licensee-controlled documents for which changes are adequately governed by a regulatory or TS requirement: (1) TS Bases controlled by ITS 5.5.14 "Technical Specifications Bases Control Program;" (2) UFSAR (includes the Technical Requirements Manual (TRM) by reference) controlled by 10 CFR 50.59; (3) the Offsite Dose Calculation Manual (ODCM) controlled by 10 CFR 50.59; (4) the Inservice Testing Program controlled by 10 CFR 50.59; and (5) the QA plans as approved by the NRC and contained in UFSAR Chapter 17. For each of these changes, Table 1 of the letter also lists the licensee-controlled documents and the TS or regulatory requirements governing changes to those documents.

Relocated Specifications

The Final Policy Statement states that CTS Section 3/4.0 specifications (LCOs and associated requirements) that do not satisfy or fall within any of the four specified criteria may be relocated from existing TS (an NRC-controlled document) to appropriate licensee-controlled documents. These requirements include the LCOs, (system description, design limits, functional capabilities, and performance levels), Action Statements (ACTIONS), and associated SRs. In its application, the licensee proposed relocating such specifications to the Updated Final Safety Analysis Report (UFSAR) (includes the Technical Requirements Manual (TRM) by reference), and the ODCM, as appropriate. Accordingly, these specifications may be relocated to one of the following licensee-controlled documents for which changes are adequately governed by a regulatory or TS requirement: UFSAR (includes the TRM by reference) controlled by 10 CFR 50.59; and the Offsite Dose Calculation Manual 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 STS, also proposed, in accordance with the criteria in the Final Policy Statement, to entirely remove the following specifications from the CTS and place them in licensee-controlled documents noted in Table R.

Table R lists specifications and specific CTS details that are relocated, based on the Final Policy Statement, to licensee-controlled documents in ITS. Table R is organized by ITS section discussion of change and provides a CTS reference, a summary description of the item, the name of the document that retains the CTS requirements, the method for controlling future changes to relocated requirements and a characterization of the discussion of change.

CTS 3.1.1.4 REACTOR COOLANT SYSTEM VENT PATH

When the RCS temperature is greater that 200°F, the RCS vent paths, consisting of at least two valves in series powered from emergency buses, are required to be operable (except that valves RC-567, 568, 569 and 570 shall be closed with power removed from the valve actuators) from the reactor vessel head and pressurizer steam space.

The RCS vent paths are provided to exhaust non-condensible gases and/or steam from the RCS which could inhibit natural circulation core cooling following any event involving a loss of offsite power and requiring long-term cooling, such as a Loss-of-Coolant Accident (LOCA). Their function, capabilities, and 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 reactor vessel head vents is not assumed in the safety analysis. This is because the operation of the vents is not part of the primary success path in the Updated Final Safety Analysis Report (UFSAR). 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.

CTS 3.1.2.2 STEAM GENERATOR PRESSURE/TEMPERATURE (P/T) LIMITS

The secondary side of the steam generator must not be pressurized above 200 psig if the temperature of the primary and vessel is below 70°F.

The steam generator pressure and temperature (P/T) limits ensure that pressure-induced stresses on the steam generators do not exceed the maximum allowable fracture toughness limits. These P/T limits are based on maintaining steam generator RT_{NDT} sufficient to prevent brittle fracture. As such, the TS places limits on variables consistent with structural analysis results. However, these limits are not initial condition assumptions of a UFSAR accident analysis. These limits represent operating restrictions and Criterion 2 includes operating restrictions. However, the Final Policy Statement Criterion 2 discussion specified only those operating restrictions required to preclude unanalyzed accidents and transients be included in TS.

CTS 3.1.2.3 PRESSURIZER TEMPERATURE LIMITS

The pressurizer shall neither exceed a maximum heatup rate of 100°F/hr nor a cool-down rate of 200°F/hr. The spray shall not be used if the temperature difference between the pressurizer and the spray fluid is greater than 320°F.

Limits are placed on pressurizer operation to prevent a non-ductile failure. These limitations are consistent with structural analysis results. However, these limits are not an initial condition assumption of a DBA or transient. These limits represent operating restrictions and Criterion 2 includes operating restrictions. The Final Policy Statement discussion for Criterion 2 specified only those operating restrictions required to preclude unanalyzed accidents and transients be included in TS.

3.1.6. (TABLE 4.1.2, Item 1) MAXIMUM REACTOR COOLANT OXYGEN AND CHLORIDE CONCENTRATION

3.1.6.1 The concentration of oxygen in the reactor coolant shall not exceed 0.1 ppm when the reactor coolant temperature exceeds 250°F.

3.1.6.2 The concentration of chloride in the reactor coolant shall not exceed 0.15 ppm when the reactor coolant temperature exceeds 250°F.

3.1.6.3 If the oxygen concentration or the chloride concentration of the reactor coolant exceed the limits given in 3.1.6.1 or 3.1.6.2, respectively, corrective action is to be taken immediately to return the system to within normal operation specifications. If the

normal operational limits are not achieved within 24 hours, the reactor is to be placed in the cold shutdown condition utilizing normal operating procedures.

Poor coolant water chemistry contributes to the long-term degradation of system materials of construction and thus 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 RCS pressure boundary caused by corrosion. However, the chemistry monitoring activity is of a long term preventative purpose rather than mitigative.

3.3.5 POST ACCIDENT CONTAINMENT VENTING SYSTEM

The reactor shall not be made critical unless the valves of the post accident containment venting system are operable.

The containment venting system ensures that hydrogen concentration within containment will be maintained below its flammability limit during post-LOCA conditions. The containment venting system is capable of controlling expected hydrogen generation associated with: (1) zirconium-water reaction, (2) radiolytic decomposition of water, and (3) corrosion of metals within containment. The buildup of hydrogen is expected to be quite small initially, such that the use of the Containment Venting System is not anticipated before 24 hours after the initiation of an accident and containment isolation valves will be maintained operable for closure and purging as provided for by ITS 3.6.3 and 3.3.6.

3.5.1 Table 3.5-5 - Operational Safety Instrumentation

3.5.1.2 For on-line testing or in the event of a subsystem instrumentation channel failure, plant operation at rated power shall be permitted to continue in accordance with Tables 3.5-2 through 3.5-5.

3.5.1.3 In the event the number of channels in a particular subsystem in service falls below the limits given in the column entitled Minimum Operable Channels, or Minimum Degree of Redundancy cannot be achieved, operation shall be limited according to the requirements shown in Column 3 of tables 3.5-2 through 3.5-4 and column 2 of Table 3.5-5

Note: *HBR current TS do not include a unique LCO that requires the operability of the instrumentation identified Table 3.5-5.*

Each individual accident monitoring parameter has a specific purpose; however, the general purpose for accident monitoring instrumentation is to provide sufficient information to confirm an accident is proceeding as predicted (i.e., automatic safety systems are performing properly, and deviations from expected accident course are minimal).

The application of deterministic selection criteria to post-accident monitoring instrumentation is documented in NRC letter dated May 9, 1988 from T. E. Murley (NRC) to R. A. Newton (Westinghouse Owners Group). The position was that the post-accident monitoring instrumentation table list should contain, on a plant-specific basis, Regulatory Guide 1.97 Type A instruments specified in the SER on Regulatory Guide 1.97, and Regulatory Guide 1.97 Category 1 instruments dated March 5, 1997. Accordingly, this position has been applied to the HBR Regulatory Guide 1.97 instruments. Those instruments meeting this criteria have remained in

TS. The instrun nts not meeting this criteria may be relocated from the TS to plant-controlled documents.

The following summarizes the HBR position for those instruments currently in TS:

From NRC SE dated March 5, 1987
Subject: Regulatory Guide 1.97, Emergency Response Capability.

Type A Variables

1. Pressurizer Level
2. Containment Vessel Level (Wide Range)
3. Containment Vessel Pressure (Wide range)
4. Containment Vessel Hydrogen Concentration
5. Incore Thermocouple

Other Type, Category 1 Variables

1. Containment Area Radiation (High Range)

Additional Instrumentation, Associated With Risk Significant Scenarios or Mitigation Systems (These indications are not specifically modeled in the HBR Probabilistic Safety Assessment (PSA); however they provide information to the operators regarding risk significant systems modeled in the PSA.)

1. Auxiliary Feedwater Flow (SD AFW Pump)
2. Auxiliary Feedwater Flow (MD AFW Pump)
3. PORV Position Indicator (Primary)
4. PORV Blocking Valve Position Indicator (Primary)
5. Safety Valve Position Indicator

For other post-accident monitoring instrumentation currently in TS, their loss is not considered risk-significant since the variable they monitor does not qualify as a Type A or Category 1 variable (one that is important to safety, or needed by the operator so that the operator can perform necessary manual actions).

Because the selection criteria have not been satisfied for other non-Regulatory Guide 1.97 Type A or Category 1 variable instruments, their associated LCO and Surveillances may be relocated to other plant-controlled documents outside the TS. The instruments to be relocated are as follows:

1. Reactor Coolant System Subcooling Monitor
2. Noble Gas Effluent Monitor - Main Steam Lines
3. Noble Gas Effluent Monitor - Main Vent Stack High Range
4. Noble Gas Effluent Monitor - Main Vent Stack Mid Range
5. Noble Gas Effluent Monitor - Spent Fuel Pit-Lower Level High Range
6. Reactor Vessel Level Instrumentation System (RVLIS)

3.5.2, (Table 3.5.6)/ 4.19.1	RADIOACTIVE LIQUID EFFLUENT INSTRUMENTATION SYSTEM

3.5.2.1 The radioactive liquid effluent monitoring instrumentation channels shown in Table 3.5-6 shall be operable with their alarm/trip setpoints set to ensure that the limits of Specification 3.9.1.1 are not exceeded. The alarm/trip setpoints shall be determined in accordance with the ODCM.

3.5.2.2 With a radioactive liquid monitoring instrumentation channel alarm/trip setpoint less conservative than required by the above specification, without delay suspend the release of radioactive liquid effluent monitored by the affected channel, change the setpoint so it is acceptably conservative, or declare the channel not operable.

3.5.2.3 With less than the minimum number of radioactive liquid effluent monitoring instrumentation operable, take the action shown in Table 3.5-6.

3.5.2.4 The provisions of Specification 3.0 are not applicable.

The purpose of the Radioactive Liquid Effluent Instrumentation is to monitor routine radioactive releases. This instrumentation provides a surveillance of release points and initiates automatic alarm and trip functions to terminate the release prior to exceeding the limits of 10 CFR 20. The alarm and trip functions are set in accordance with the ODCM. Radioactive liquid effluent instrumentation and associated requirements for effluent releases are used to assure conformance to the discharge limits of 10 CFR Part 20. The radioactive liquid effluent monitors are used routinely to provide a continuous check on the release of radioactive liquid effluent from the normal plant effluent flow paths. These requirements ensure the various liquid effluent monitors are maintained operable with setpoints established in accordance with the ODCM. Plant DBA and transient analyses do not assume any action, either automatic or manual, resulting from radioactive liquid effluent monitors.

3.5.3. (Table 3.5.7)/ 4.19.2 RADIOACTIVE GASEOUS EFFLUENT INSTRUMENTATION SYSTEM

3.5.3.1 The radioactive gaseous effluent monitoring instrumentation channels shown in Table 3.5-7 shall be operable with their alarm/trip setpoints set to ensure that the limits of Specification 3.9.3.1 are not exceeded. The alarm/trip setpoints of these channels shall be determined in accordance with the ODCM.

3.5.3.2 With a radioactive effluent monitoring instrumentation channel alarm/trip setpoint less conservative than required by the above specification, without delay suspend the release of radioactive gaseous effluents, change the setpoint so it is acceptably conservative, or declare the channel not operable.

3.5.3.3 With less than the minimum number of radioactive liquid effluent monitoring instrumentation channels operable, take the action shown in Table 3.5-7.

3.5.3.4 The provisions of Specification 3.0 are not applicable.

The purpose of the Radioactive Gaseous Effluent Instrumentation is to monitor routine and control, as applicable, radioactive releases. This instrumentation provides a surveillance of release points and initiates automatic alarm/trip functions to terminate the release prior to exceeding the limits of 10 CFR 20. The alarm/trip functions are set in accordance with the ODCM. Radioactive gases effluent monitoring instrumentation and associated requirements for

gaseous effluent releases are used to assure conformance to the discharge limits of 10 CFR Part 20. The radioactive gaseous effluent monitors are used routinely to provide a continuous check on the release of radioactive gaseous effluents from the normal plant gaseous effluent flow paths. These requirements ensure the various effluent monitors are maintained operable with setpoints established in accordance with the ODCM. Plant DBA and transient analyses do not assume any action, either automatic or manual, resulting from radioactive gaseous effluent monitors.

3.8.1.c SPENT FUEL STORAGE AREA RADIATION MONITORING DURING REFUELING

Radiation levels in the containment and spent fuel storage areas shall be monitored continuously.

This relocated item addresses only the portion of the specification associated with spent fuel storage area radiation monitoring. The portion associated with containment radiation monitoring is retained in the HBR ITS. Radiation monitoring in the spent fuel storage area during refueling operations provides warning of abnormal or unusually high radiation levels in the spent fuel storage area. However, these monitors do not automatically initiate the Spent Fuel Building Ventilation System. The Spent Fuel Building Ventilation System is required to be in operation with the exhaust discharging through high-efficiency participate operator air (HEPA) and charcoal filters during movement of irradiated fuel in the Spent Fuel Building.

3.8.1.g COMMUNICATIONS DURING REFUELING

Direct communication between the control room and the refueling cavity manipulator crane shall be available whenever changes in core geometry are taking place.

Communication between the control room personnel and personnel performing core alterations is maintained to ensure that personnel can be promptly informed of significant changes in the plant status or core reactivity condition during refueling. The 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 in analyzing accident consequences.

3.8.3 SPENT FUEL POOL WATER TEMPERATURE

During the discharge of a full core into the spent fuel pit, the temperature of the spent fuel pool water shall be maintained at or below 150°F. The spent fuel pool water temperature shall be monitored once each shift when the temperature is at of below 125°F. If the temperature exceeds 125°F, it shall be monitored hourly. If the pool temperature reaches 150°F, fuel assemblies will be transferred back to the containment to reduce the pool temperature below 150°F.

The spent fuel cooling system is designed to maintain the pool temperature less than or equal to 160°F. The restriction of 150°F provides a margin to prevent the fuel pool temperature from reaching the design value. Plant operating procedures provide adequate controls for this plant parameter. These limits are not related to protection of the public from the consequences of any DBA or transient.

3.8.4 SPENT FUEL CASK HANDLING CRANE

3.8.4 The following restrictions and requirements shall be applied to the Spent Fuel Cask Handling Crane:

a. Use of the Spent Fuel Cask Handling Crane for lifting operations shall be permitted only when the ambient outside air temperature is greater than 33°F. If the temperature falls below this limit, lifting operations shall be suspended, with the load placed in a safe configuration, until the temperature increases above the limit.

b. Limit switches provided to limit travel of the bridge, trolley, and hoist shall be tested every 6 months when the crane is not in service, and shall be tested prior to each period of service and on a monthly basis while the crane is in service.

c. Crane ropes shall be inspected in accordance with ANSI B30.2.0 - 1967 every 6 months when the crane is not in service, and shall be inspected prior to each period of service and on a monthly basis while the crane is in service. A crane rope shall be replaced if any of the replacement criteria given in ANSI B30.2.0-1967 are met.

The requirements of Specification 3.8.4 are based on limiting the potential for a cask drop accident. Provisions have been made to reduce the potential for a spent fuel cask drop as a credible accident. Redundancy has been incorporated in the design of the spent fuel cask lifting yoke and the 125-ton spent fuel cask handling crane to reduce the risk to public health and safety. A discussion of the safety features of the cask and handling components is contained in Letter NG-74-1246, dated October 17, 1974, CP&L to U.S. Atomic Energy Commission, Spent Fuel Cask Handling. Other actions implemented associated with the control of heavy loads include training of personnel; use of appropriate load handling procedures; identification and utilization of safe load paths; inspection, testing and maintenance of cranes; appropriate design of crane and lifting devices, etc. These actions and the redundancy associated with the design of the spent fuel cask lifting yoke and crane provide reasonable assurance regarding the limited potential for a cask drop accident.

3.9.1/4.10.1 COMPLIANCE WITH 10 CFR 20 - RADIOACTIVE MATERIALS IN LIQUID EFFLUENTS

3.9.1.1 The concentration of radioactive material in liquid effluents released at any time from the site to unrestricted areas (see Figure 1.1-1) shall be limited to the concentrations specified in 10 CFR 20, Appendix B, Table II, Column 2 for radionuclides other than dissolved or entrained noble gases. For dissolved or entrained noble gases, the concentration shall be limited to 2 x 10-4 μCi/ml total activity.

3.9.1.2 With the concentration of radioactive material in liquid effluents released from the site to unrestricted areas exceeding the above limits, without delay restore the concentration to within the above limits. In addition, notification must be made to the Commission in accordance with Specification 6.6.

3.9.1.3 In the event that the immediate action required by 3.9.1.2 above cannot be satisfied, the facility shall be placed in hot shutdown within 12 hours and in cold shutdown within the next 30 hours, and entry into the power operating condition shall not be made unless Specification 3.9.1.1 is met.

3.9.1.4 The provisions of Specification 3.0 are not applicable.

The Liquid Effluent Concentration Limit ensures that the concentration of radioactive materials released in liquid waste effluent to unrestricted areas will be less than the concentration levels specified in 10 CFR 20, Appendix B. 10 CFR Part 20, BII(2) refers to liquid release to an unrestricted area of radioactive material in concentrations that exceed the specified limits. No screening criteria apply because the process variable of the LCO (concentration of radioactive material in liquid effluents) is not an initial condition of a DBA or transient analysis. Effluent control is for protection against radiation hazards from licensed activities, not accidents.

3.9.2 COMPLIANCE WITH 10 CFR 50 RADIOACTIVE MATERIALS IN LIQUID EFFLUENTS

3.9.2.1 The dose commitment at all times to a member of the public from radioactive materials in liquid effluents released to unrestricted areas (See Figure 1.1-1) shall be limited:

a. During any calendar quarter to ≤ 1.5 mrem to the total body and to ≤ 5 mrem to any organ, and

b. During any calendar year to ≤ 3 mrem to the total body and to ≤ 10 mrem to any organ.

3.9.2.2 With the calculated dose commitment from the release of radioactive materials in liquid effluents exceeding any of the limits prescribed by Specification 3.9.2.1 above, prepare and submit a report to the Commission in accordance with Specification 6.9.3.2.

This specification is provided to implement the requirements of Sections II.A, III.A, and IV.A of Appendix I, 10 CFR Part 50. The LCO implements the guides set forth in Section II.A of Appendix I. The action statement provides the required operating flexibility and at the same time implements the guides set forth in Section IV.A of Appendix I of 10 CFR Part 50 to assure that the release of radioactive material in liquid effluents will be kept "as low as is reasonably achievable." Limitation of the quarterly and annual projected doses to MEMBERS OF THE PUBLIC as a result of cumulative liquid effluent discharge during normal operation over extended periods is intended to assure compliance with the dose objectives of 10 CFR Part 50, Appendix I. These limits are not related to protection of the public from the consequences of any DBA or transient.

3.9.3/4.10.2 COMPLIANCE WITH 10 CFR 20 - RADIOACTIVE MATERIAL IN GASEOUS EFFLUENTS

3.9.3.1 The dose rate due to radioactive materials in gaseous effluents released from the site boundary (see Figure 1.1-1) shall be limited to the following:

a. For radionoble gases: ≤ 500 mrem/yr to the total body, ≤ 3000 mrem/yr to the skin, and

b. For I-131, I-133, and tritium, and for all radioactive materials in particulate form, inhalation pathway only, with half lives greater than 8 days: ≤ 1500 mrem/yr to any organ.

3.9.3.2 With the dose rate(s) exceeding the above limits, without delay decrease the release rate to within the above limits. In addition, a notification must be made to the Commission in accordance with Specification 6.6.

3.9.3.3 In the event that the immediate action required by 3.9.3.2 above cannot be satisfied, the facility shall be placed in hot shutdown within 12 hours and in cold shutdown within the next 30 hours, and entry into the power operating condition shall not be made until Specification 3.9.3.1 is met.

This specification is provided to ensure the dose rate at any time at the site boundary from gaseous effluents is within the annual dose limits of 10 CFR 20 for unrestricted areas. The annual dose limits are the doses associated with the concentrations of 10 CFR 20 Appendix B, Table II, Column 1. These are limits which apply to normal operation of the plant. They are not assumed as an initial condition of any DBA or transient analysis and are not relied upon to limit the consequences of such events.

3.9.4/4.10.3 COMPLIANCE WITH 10 CFR 50 - RADIONOBLE GASES

3.9.4.1 The air dose commitment due to radionoble gases released in gaseous effluents to areas at and beyond the site boundary (See Figure 1.1-1) shall be limited, at all times, to the following:

a. During any calendar quarter, to ≤ 5 mrad for gamma radiation and ≤ 10 mrad for beta radiation;

b. During any calendar year, to ≤ 10 mrad for gamma radiation and ≤ 20 mrad for beta radiation.

3.9.4.2 With the calculated air dose commitment from radioactive noble gases in gaseous effluents exceeding any of the limits prescribed by Specification 3.9.4.1 above, prepare and submit a report to the Commission in accordance with Specification 6.9.3.2.

The specification ensures that the concentration of radioactive materials released in gaseous effluent to unrestricted areas are kept as low as reasonably achievable. This specification is provided to implement the requirements of Sections II. B, III.A and IV.A of Appendix I, 10 CFR Part 50. The LCO implementing the guides provides the required operating flexibility and at the same time implements the guides set forth in Section IV.A of Appendix I to assure that the releases of radioactive material in gaseous effluents will be kept "as low as is reasonably achievable." These limits are not related to protection of the public from the consequences of any DBA or transient.

3.9.5/4.10.4 COMPLIANCE WITH 10 CFR 50 - RADIOIODINES, RADIOACTIVE MATERIALS IN PARTICULATE FORM AND RADIONUCLIDES OTHER THAN RADIONOBLE GASES

3.9.5.1 The dose to a member of the public from I-131, I-133, tritium and radioactive materials in particulate form, with half-lives greater than 8 days in gaseous effluents released to unrestricted areas (See Figure 1.1-1), shall be limited, at all times, to the following:

a. During any calendar quarter, ≤ 7.5 mrem to any organ, and

b. During any calendar year, ≤ 15 mrem to any organ.

3.9.5.2 With the calculated dose commitment from the release of I-131, I-133, tritium and radioactive materials in particulate form, with half lives greater than 8 days, in gaseous effluents exceeding any of the limits prescribed by Specification 3.9.5.1 above, prepare and submit a report to the Commission in accordance with Specification 6.9.3.2.

This specification is provided to implement the requirements of Sections II. C, III.A, and IV.A of Appendix I, 10 CFR Part 50. The LCO implements the guides set forth in Section II.C of Appendix I. The action statement provides the required operating flexibility and at the same time implements the guides set forth in Section IV.A of Appendix I to assure that the releases of radioactive materials as gaseous effluents will be kept "as low as reasonably achievable." These limits are not related to protection of the public from the consequences of any DBA or transient.

3.9.6/4.10.5 COMPLIANCE WITH 10 CFR 190 - RADIOACTIVE EFFLUENT FROM URANIUM FUEL CYCLE SOURCES

3.9.6.1 The dose commitment to any member of the public, due to releases of licensed materials and radiation from uranium fuel cycle sources shall be limited to ≤ 25 mrem to the total body or any organ except the thyroid, which shall be limited to ≤ 75 mrem over 12 consecutive months. This specification is applicable to HBR only for the area within a 5 mile radius around the HBR.

3.9.6.2 With the calculated doses from the release of the radioactive materials in liquid or gaseous effluents exceeding twice the limits of TS 3.9.2.1.a, 3.9.2.1.b, 3.9.4.1.a, 3.9.4.1.b, 3.9.5.1.a, or 3.9.5.1.b, calculations should be made including direct radiation contributions from the reactor unit and from outside storage tanks to determine whether the above limits of Specification 3.9.6.1 have been exceeded. If such is the case, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.3.2.d, a Special Report that defines the corrective action to be taken to reduce subsequent releases to prevent recurrence of exceeding the above limits and includes the schedule for achieving conformance with the above limits. This Special Report, as defined in 10 CFR Part 20.405c, shall include an analysis that estimates the radiation exposure (dose) to a member of the public from uranium fuel cycle sources, including all effluent pathways and direct radiation, for the calendar year that includes the release(s) covered by this report. It shall also describe levels of radiation and concentrations of radioactive material involved, and the cause of the exposure levels or concentrations. If the estimated dose(s) exceeds the above limits, and if the release condition resulting in violation of 40 CFR Part 190 has not already been corrected, the Special Report shall include a request for a variance in accordance with the provisions of 40 CFR Part 190. Submittal of the report is considered a timely request, and a variance is granted until staff action on the same request is complete.

3.9.6.3 The provisions of Specification 3.0 are not applicable.
This specification ensures the dose limitations of 10 CFR 40 Part 190 which were incorporated into 10 CFR 20 are not exceeded. This is intended to assure that normal operation of the plant is in compliance with the provisions of 40 CFR Part 190. These limits are not related to protection of the public from any DBA or transient.

3.10.7 POWER RAMP RATE LIMITS

3.10.7.1 During the return to power following a shutdown where fuel assemblies have been handled (e.g., refueling, inspection), the rate of reactor power increase shall be limited to 3 percent of rated power in an hour between 20 percent and 100 percent of rated power. This ramp rate requirement applies during the initial startup and may apply during subsequent power increases, depending on the maximum power level achieved and length of operation at that power level. Specifically, this requirement can be moved for reactor power levels below a power level P (20 percent < P ≤ 100 percent), provided that the plant has operated at or above power level P for at least 72 cumulative hours in any 7-day operating period following the shutdown.

The rate of reactor power increases above the highest power level sustained for at least 72 cumulative hours during the preceding 30 cumulative days of reactor power operation shall be limited to 3 percent of rated power in an hour. Alternatively, reactor power increase can be accomplished by a single step increase less than or equal to 10 percent of rated power followed by a maximum ramp rate of 3 percent of rated power in an hour beginning 3 hours after the step increase.

Calculations show that high cladding stresses can occur if the reactor power increase is rapid after startup from a refueling. The 72-hour period allows for thermal stress relaxation of the clad before the ramp rate requirement is removed, therefore reducing the potential harmful effects of possible pellet or fragment relocation. The 3 percent limit is imposed to minimize the effects of adverse cladding stresses resulting from reduced power operation for extended periods of time. The time period of 30 days is based upon the successful power ramp demonstrations performed on Zircaloy clad in operating reactors, resulting in no cladding failures. The limits associated with this specification are related to minimizing fuel clad damage normal operation. ITS LCO 3.4.16, RCS Specific Activity provides controls to limit allowable radionuclides in the RCS. The limits associated with CTS 3.10.7 are not directly related to a DBA or transient.

3.11 MOVABLE IN-CORE INSTRUMENTATION

3.11.1 A minimum of 15 total accessible thimbles and at least 2 per quadrant sufficient movable in-core detectors shall be operable during recalibration of the excore symmetrical offset detection system.

3.11.2 Power shall be limited to 90% of rated power if recalibration requirements for the excore symmetrical offset detection system defined in Table 4.1-1 are not met.

The movable in-core instrumentation is used to determine the gross power distribution in the core as indicated by the power balance between the top and bottom halves of the core. The full

system has more capability than is needed for the calibration of the excore detectors. If the calibration is not performed, the mandated power reduction assures safe operation since it will compensate for an error of 10% in the excore detection system.

3.16.1/4.20.1 LIQUID RADWASTE TREATMENT SYSTEM

3.16.1.1 The appropriate portions of the Liquid Radwaste Treatment System shall be maintained and used to reduce the concentrations of radioactive materials in liquid wastes prior to their discharge when the projected dose commitments, due to the release of radioactive liquid effluents to unrestricted areas (See Figure 1.1-1) when averaged over a calendar quarter, would exceed 0.2 mrem to the total body or 0.6 mrem to any organ.

3.16.1.2 With radioactive liquid wastes being discharged without treatment while in excess of the limits of Specification 3.16.1.1 above, prepare and submit a report to the Commission in accordance with Specification 6.9.3.2.b.

The Liquid Radwaste Treatment System ensures that effluents will be treated prior to release to the environment. Appropriate portions of the system are required to be operable to maintain doses as low as reasonably achievable. The requirement for a liquid waste treatment system pertains to controlling the release of site liquid effluents during normal operational occurrences. No loss of primary coolant is involved; neither is an accident condition assumed or implied. The limits for release in 10 CFR Part 50, Appendix I for liquids are design objectives for operation. In addition, the liquid radwaste subsystems are not credited in the safety sequence analysis and are not part of the primary coolant pressure boundary.

3.16.3/4.20.3 GASEOUS RADWASTE AND VENTILATION EXHAUST TREATMENT SYSTEMS

3.16.3.1 The appropriate portions of the Gaseous Radwaste Treatment System and the Ventilation Exhaust Treatment System shall be maintained and used to reduce the concentrations of radioactive materials in gaseous wastes prior to their discharge when the projected dose commitments due to the release of gaseous effluents to unrestricted areas (See Figure 1.1-1) when averaged over a calendar quarter would exceed:

a. 0.6 mrem for gamma radiation and 1.3 mrem for beta radiation due to radionoble gases or,

b. 1.0 mrem to any organ due to radioiodines, radioactive materials in particulate form, and radionuclides other than radionoble gases.

3.16.3.2 With the Gaseous Radwaste Treatment System and/or the Ventilation Exhaust Treatment System not operable and with radioactive gaseous wastes being discharged without treatment while in excess of the limits of Specification 3.16.3.1 above, prepare and submit a report to the Commission in accordance with Specification 6.9.3.2.b.

The specification ensures that appropriate portions of these systems are maintained and used when specified to ensure that the releases of radioactive material in gaseous effluent is kept as

low as reasonably achievable. In addition, the operability of the gaseous radwaste treatment system is not assumed in the analysis or any DBA or transient.

3.16.6/4.20.6 SOLIDIFICATION OF WET RADIOACTIVE WASTE

3.16.6.1 The Solid Radwaste System shall be used in accordance with a Process Control Program (PCP) to process wet radioactive waste to meet shipping and burial ground requirements.

3.16.6.2 With the provisions of the PCP not satisfied, suspend shipments of defectively processed or defectively packaged solid radioactive waste from the site.

3.16.6.3 If any test specimen, as required by the PCP, fails to verify solidification, the solidification of the batch under test shall be suspended until such time as additional test specimens can be obtained, alternative solidification parameters can be determined in accordance with the PCP, and a subsequent test verifies solidification. The PCP shall be modified as required in accordance with Section 6.15, and solidification of the batch may then be resumed using alternative solidification parameters as determined by the PCP.

This specification ensures that the packaging of wet radioactive waste meets the requirements of 10 CFR 20 and 10 CFR 71 prior to their shipment from the site for disposal. The solid radioactive waste system is a logical continuation of the liquid radwaste system. It operates on the same requirement for effluent control, identified as controlling the release and handling of radioactive solid wastes. The system serves to control operational release of solid waste, not accidental release.

3.17.1/4.21.1 MONITORING PROGRAM

3.17.1.1 The Radiological Environmental Monitoring Program shall be conducted as specified in Table 3.17-1.

3.17.1.2 With the radiological environmental monitoring program not being conducted as specified in Table 3.17-1, prepare and submit to the Commission, in the Annual Radiological Environmental Operating Report required by Specification 6.9.1.e, a description of the reasons for not conducting the program as required and the plans for preventing a recurrence.

3.17.1.3 With the level of radioactivity as the result of plant effluents in an environmental sampling medium at a specified location exceeding the reporting levels of Table 3.17-2 when averaged over any calendar quarter, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.3.2, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions to be taken to reduce radioactive effluents so that the potential annual dose to a member of the public is less than the calendar year limits of Specifications 3.9.2.1, 3.9.4.1, and 3.9.5.1. When more than one of the radionuclides in Table 3.17-2 are detected in the sampling medium, this report shall be submitted if:

$$\frac{\text{concentration (1)}}{\text{reporting level (1)}} + \frac{\text{concentration (2)}}{\text{reporting level (2)}} + \ldots \geq 1.0$$

When radionuclides other than those in Table 3.17-2 are detected and are the result of plant effluents, this report shall be submitted if the potential annual dose' to a member of the public is equal to or greater than the calendar year limits of Specifications 3.9.2.1, 3.9.4.1, and 3.9.5.1. This report is not required if the measured level of radioactivity was not the result of plant effluents; however, in such an event, the condition shall be reported and described in the Annual Radiological Environmental Operating Report.

3.17.1.4 With milk or fresh leafy vegetable samples unavailable from one or more of the sample locations required by Table 3.17-1, identify locations for obtaining replacement samples and add them to the radiological environmental monitoring program within 30 days. The specific locations from which samples were unavailable may then be deleted from the monitoring program. Pursuant to Specification 6.9.1.d, identify the cause of the unavailability of samples and identify the new location(s) for obtaining replacement samples in the next Semiannual Radioactive Effluent Release Report and also include in the report a revised figure(s) and table for the ODCM reflecting the new location(s).

3.17.1.5 The provisions of Specification 3.0 are not applicable.

3.17.1.6 Deviations are permitted from the required sampling schedule if specimens are unobtainable due to hazardous conditions, seasonal unavailability, or to malfunction of automatic sampling equipment. If the latter, every effort shall be made to complete corrective action prior to the end of the next sampling period.

The Environmental Monitoring Program provides data on radiation levels and radioactive materials in exposure pathways for those radionuclides that lead to the highest potential radiation exposure to members of the public resulting from plant operation. This is accomplished by effluent measurement and modeling the environmental exposure pathways. This program is not related to protection of the public from any DBA or transient.

3.17.2/4.21.2 LAND USE CENSUS

3.17.2.1 A land use census shall be conducted and shall identify the location of the nearest milk animal, the nearest residence and the nearest garden of greater than 500 square feet producing fresh leafy vegetables in each of the 16 meteorological sectors within a distance of 5 miles.

3.17.2.2 With a land use census identifying a location(s) that yields a calculated dose or dose commitment greater that the values currently being calculated in Specification 4.10.4.1, identify the new location(s) in the next Semiannual Radioactive Effluent report, pursuant to Specification 6.9.1.d.

3.17.2.3 With the land use census identifying a location which yields an annual calculated dose or dose commitment of a specific pathway which is 20% greater than that at a current sampling location:

(a) add the new location(s) to the radiological environmental monitoring program within 30 days and,

(b) if desired, delete the sampling location having the lowest calculated dose or dose commitments via the same exposure pathway, excluding the control station location, from the monitoring program after October 31 of the year in which the land use census was conducted, and

(c) identify the new location(s) in the next Semiannual Radioactive Effluent Release Report, Specification 6.9.1.d, including a revised figure(s) and table for the ODCM reflecting the new location(s).

The Land Use Census ensures that changes in the use of land are identified and accounted for in the Radiological Environmental Monitoring Program given in the ODCM. This program is not related to protection of the public from any DBA or transient.

3.17.3/4.21.3 INTERLABORATORY COMPARISON PROGRAM

3.17.3.1 Analyses shall be performed on radioactive materials supplied by EPA as a part of an Interlaboratory Comparison Program of like media within the environmental program as per Table 3.17-1.

3.17.3.2 With analyses not being performed as required above, report the corrective actions taken to prevent a recurrence to the Commission in the Annual Radiological Environmental Operating Report pursuant to Specification 6.9.1.e.

3.17.3.3 The provisions of Specification 3.0 are not applicable.

3.17.3.4 The Interlaboratory comparison Program shall be described in the ODCM. A summary of the results obtained as part of the above required Interlaboratory Comparison Program shall be included in the Annual Radiological Environmental Operating Report pursuant to Specification 6.9.1.e.

The interlaboratory comparison program ensures that independent checks on the precision and accuracy of the measurements of radioactive materials in the environmental samples are performed as part of the QA program for the environmental monitoring program. This program is not related to protection of the public from any (DBA) or transient.

4.16 RADIOACTIVE SOURCE LEAKAGE TESTING

The following surveillance requirements imply LCOs exist; however, unique LCOs are not specifically identified in Section 3 of the CTS. These surveillance requirements are comparable to surveillance requirements contained in 3/4.7.10, Sealed Source Contamination of NUREG-0452, Rev. 4, "Standard Technical Specifications For Westinghouse Pressurized Water Reactors."

4.16.1 The leakage test shall be capable of detecting the presence of .005 microcurie of radioactive material on the test sample. If the test reveals the presence of . 005 microcurie or more of removable contamination, it shall immediately be withdrawn from use, decontaminated, and repaired, or be disposed of in accordance with

Commission regulations. Sealed sources are exempt from such leak tests when the source contains 100 microcuries or less of beta and/or gamma emitting material or 10 microcuries or less of alpha emitting material.

4.16.2 Tests for leakage and/or contamination shall be performed by the licensee or by other persons specifically authorized by the Commission or an Agreement State as follows:

A. Each sealed source, except startup sources subject to core flux, containing radioactive material, other than Hydrogen 3, with a half-life greater than 30 days and in any form other than gas shall be tested for leakage and/or contamination at intervals not to exceed 6 months.

B. The periodic leak test required does not apply to sealed sources that are stored and not being used. The sources excepted from this test shall be tested for leakage prior to any use or transfer to another user unless they have been leak tested within 6 months prior to the date of use or transfer.

In the absence of a certificate from a transferor indicating that a test has been made within six months prior to the transfer, sealed sources shall not be put into use until tested.

C. Startup sources shall be leak tested prior to and following any repair or maintenance and before being subjected to core flux.

This specification ensures that leakage from Byproduct, Source and Special Nuclear Material sources will not exceed allowable intake values. The limitation on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR Part 70.39(a)(3) limits for plutonium. This program is not related to protection of the public from any DBA or transient.

APPENDIX B (TECHNICAL SPECIFICATION)

A. Radioactive Effluent Releases

A statement of the quantities of radioactive effluents released from the plant with data summarized on a monthly basis following the format of USNRC Regulatory Guide 1.21.

1. Gaseous Effluents
   (a) Gross Radioactivity Releases
      (1) Total gross radioactivity (in curies), primarily noble and activation gases.
      (2) Maximum gross radioactivity release rate during any 1-hour period.
      (3) Total gross radioactivity (in curies) by nuclide released based on representative isotopic analyses performed.
      (4) Percent of technical specification limit.
   (b) Iodine Releases
      (1) Total iodine radioactivity (in curies) by nuclide released based on representative isotopic analyses performed.
      (2) Percent of technical specification limit for I-131 released.
   (c) Particulate Releases

(1) Total gross radioactivity (βγ) released (in curies) excluding background radioactivity.
(2) Gross alpha radioactivity released (in curies) excluding background radioactivity.
(3) Total gross radioactivity (in curies) of nuclides with half-lives greater than eight days.
(4) Percent of technical specification limit for particulate radioactivity with half-lives greater than eight days.

2. Liquid Effluents
   (a) Total gross radioactivity (βγ) released (in curies) excluding tritium and average concentration released to the unrestricted area.
   (b) The maximum concentration of gross radioactivity (βγ) released to the unrestricted area (averaged over the period of release).
   (c) Total tritium and total alpha radioactivity (in curies) released and average concentration released to the unrestricted area.
   (d) Total dissolved gas radioactivity (in curies) and average concentration released to the unrestricted area.
   (e) Total volume (in liters) of liquid waste released.
   (f) Total volume (in liters) of dilution water used prior to release from the restricted area.
   (g) Total gross radioactivity (in curies) by nuclide released based on representative isotopic analyses performed.
   (h) Percent of technical specification limit for total radioactivity.

B. Solid Waste
   1. The total amount of solid waste shipped (in cubic feet).
   2. The total estimated radioactivity (in curies) involved.
   3. Disposition including date and destination.

C. Environmental Monitoring
   1. For each medium sampled during the reporting period, e.g., air, baybottom, surface water, soil, fish, include:
      (a) Number of sampling locations,
      (b) Total number of samples,
      (c) Number of locations at which levels are found to be significantly above local backgrounds, and
      (d) Highest, lowest, and the average concentrations or levels or radiation for the sampling point with the highest average and description of the location of that point with respect to the site.

The Appendix B Technical Specifications contain environmental reporting requirements which were relocated to Appendix B as an interim action in 1976 pending completion of issuance of comprehensive Appendix B Environmental Technical Specifications. These requirements are comparable to portions of other Radiological Environmental Monitoring Technical Specifications which are also being separately relocated.

Conclusion

These current specifications are not required to be in the TS under 10 CFR 50.36 and do not meet any of the four criteria in the Final Policy Statement. 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 staff finds that sufficient regulatory controls exist under the regulations cited above to maintain the effect of the provisions in these specifications. The staff has concluded that appropriate controls have been established for all of the current specifications, information, and requirements that are being moved to licensee-controlled documents. Until incorporated in the UFSAR and procedures, changes to these specifications, information, and requirements will be controlled in accordance with the applicable current procedures that control these documents. Following implementation, the NRC will audit the removed provisions to ensure that an appropriate level of control has been achieved. The staff has concluded that, in accordance with the Final Policy Statement, sufficient regulatory controls exist under the regulations, particularly in 10 CFR 50.59. Accordingly, these specifications, information, and requirements, as described in detail in this Safety Evaluation, may be relocated from CTS and placed in the UFSAR or other licensee-controlled documents as specified letter dated, _____, XX 1997.

Control of Specifications, Requirements, and Information Removed from the CTS

The facility and procedures described in the UFSAR and TRM, incorporated into the UFSAR by reference, can only be revised in accordance with the provisions of 10 CFR 50.59, which ensures an auditable record and establishes appropriate control over requirements removed from CTS and over future changes to the requirements. Other licensee-controlled documents contain provisions for making changes consistent with other applicable regulatory requirements: for example, the Offsite Dose Calculation Manual (ODCM) can be changed in accordance with 10 CFR Part 20; the emergency plan implementing procedures (EPIPs) can be changed in accordance with 10 CFR 50.54(q); and the administrative instructions that implement the Quality Assurance Manual (QAM) can be changed in accordance with 10 CFR 50.54(a) and 10 CFR Part 50, Appendix B. Temporary procedure changes are also controlled by 10 CFR 50.54(a). The documentation of these changes will be maintained by the licensee in accordance with the record retention requirements specified in the licensee's QA plan for HBR and such applicable regulations as 10 CFR 50.59.

The licensee committed by a letter(s) dated _____ xx, 1996, to confirm that CTS requirements designated for placement in the UFSAR or the TRM are appropriately reflected in these documents, or that they will be included in the next required update of these documents. The licensee has also committed to maintain an auditable record of, and an implementation schedule for, the procedure changes associated with the development of ITS . The licensee will also maintain the documentation of these changes in accordance with the record retention requirements in the QA plan and the LCS. Table ___ in the letter lists the changes involving specific requirements that have been removed from the CTS. For each of these changes, Table 1 also lists the licensee-controlled documents and the TS or regulatory requirements governing changes to those documents.

IV. STATE CONSULTATION

In accordance with the Commission's regulations, the South Carolina State official was notified of the proposed issuance of the amendment. [The State official had no comments.] [The state official provided comments ... .] [This action will be performed when the staff issues the final TS.]

V. ENVIRONMENTAL CONSIDERATION

Pursuant to 10 CFR 51.21, 51.32, and 51.35, an environmental assessment and finding of no significant impact was published in the Federal Register on 6 FR).

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

VI. CONCLUSION

The improved HBR TS provide clearer, more readily understandable requirements to ensure safe operation of the plant. The staff concludes that they satisfy the guidance in the Commission's policy statement with regard to the content of technical specifications, and conform to the model provided in NUREG-1434 with appropriate modifications for plant-specific considerations. The staff further concludes that the improved HBR TS satisfy Section 182a of the Atomic Energy Act, 10 CFR 50.36 and other applicable standards. On this basis, the staff concludes that the proposed improved HBR TS are acceptable.

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

Principal Contributors:

Date:

APPENDIX

ITS 3.3.1 INSTRUMENT SETPOINT METHODOLOGY USED TO ESTABLISH THE "ALLOWABLE VALUE" column in ITS Tables 3.3.1-1, 3.3.2-1, and 3.3.5-1.

This "ALLOWABLE VALUE" column is added to provide an allowance for calibration tolerances, instrumentation uncertainties, instrument drift, and severe environment errors for those Reactor Protection System (RPS), Engineered Safety Features Actuation System (ESFAS), and AFW actuation channels that must function in harsh environments. The licensee submitted Rev. 3 of Design Guide No. DG - VIII.50, "Instrument Setpoints" which was used to calculate instrument setpoints and to determine the allowable values and trip setpoints indicated in the ITS. These instrument setpoint calculations resulted in some allowable values and trip setpoints which were less restrictive and some which were more restrictive than the values provided in the current TS. The methodology used by the licensee is based on the guidelines provided in ANSI/ISA -S67.04-1988, "Setpoints for Nuclear Safety-Related Instrumentation," dated February 4, 1988, ISA - dRP67.04, Part II, Draft Recommended Practice, "Methodology for the Determination of Setpoints for Nuclear Safety-Related Instrumentation," Draft 10, dated August 1992, and NRC Regulatory Guide, 1.105, "Instrument Setpoints for Safety-Related Systems," which endorses ISA S67.04-1988. Design Guide No. DG-VIII.50 was used by the licensee to calculate instrument setpoints for all three of the licensee's nuclear plant sites. The NRC staff has previously reviewed and approved this setpoint methodology for use at Brunswick Steam Electric Plant, Units 1 and 2, during the review of the power uprate license amendments. During a meeting on July 16 and 17, 1997, the licensee also provided two sample calculations for Robinson which the staff determined were consistent with the setpoint methodology discussed in the DG-VIII.50. Based on its review, the staff finds the setpoint methodology to be acceptable.

The NRC staff confirmed that the proposed ITS trip setpoints and allowable values are intended to maintain acceptable margins between operating conditions and trip setpoints, and do not significantly increase the likelihood of a false trip nor failure to trip upon demand Therefore, the existing licensing basis is not affected.

Based on the above, the staff concludes that the licensee's setpoint methodology and the resulting trip setpoints and allowable values incorporated in the ITS conversion package are consistent with the HBR licensing basis, and are, therefore, acceptable.

3.4.1 ECCS OPERABILITY WITHIN LTOP OPERATION RANGE

The LTOP system controls RCS pressure at low temperatures so that the integrity of the RCS pressure boundary is not compromised by violating 10 CFR Part 50, Appendix G. H.B. HBR's LTOP system utilizes the pressurizer PORVs to accomplish this function. The system is manually enabled by the operators. When enabled, the system signals the PORVs to open if the RCS pressure reaches the LTOP actuation pressure setpoint.

The design basis of HBR's LTOP system considers both mass-addition and heat-addition transients during water solid RCS conditions. The transients considered in the design of the system were inadvertent SI and charging/letdown flow mismatch for mass-addition; and inadvertent actuation of pressurizer heaters, loss of RHR cooling, and RCP startup with temperature asymmetry within the RCS or between the RCS and the steam generators for heat-addition.

The scope of the NRC staff review was primarily limited to the mass-addition analysis and specifically, the case for a temperature range of 175°F ≤ T_{cold} ≤ 350°F where one SI pump and all three charging pumps are capable of injecting into the RCS. The application of the new LTOP actuation pressure setpoint limit of ≤ 400 psig to the entire LTOP operation range, including T_{cold} < 175°F, was also addressed.

The licensee's LTOP analysis of record (old analysis) was performed for three charging pumps and no SI pumps operable over the entire LTOP operating range (i.e., T_{cold} ≤ 350°F). Accordingly, the current TS do not allow any SI pumps to be operable when T_{cold} is less than or equal to 350°F. The old analysis methodology remains valid for operational configurations within the assumptions used in that methodology, including but not limited to the assumption that no SI pumps be capable of injecting into the RCS. The licensee evaluated the effect of the proposed LTOP setpoint of 400 psig and instrument uncertainty value of 45.9 psi on the old analysis. In accordance with that previously approved methodology, the new peak pressures achieved remain acceptable. Therefore, the licensee proposes to continue to rely on the old analysis methodology for LTOP operation below T_{cold} of 175°F.

To support the proposed changes which would allow an SI pump to be operable in Mode 4 and 5 when T_{cold} ≥ 175°F, the licensee performed a new analysis for that configuration. The licensee's new analysis was performed using a modified ANF-RELAP model based on the plant's Cycle 17 non-LOCA transient model. The new analysis models the injection from all three charging pumps and one SI pump into a water solid RCS with all three RCPs and both RHR pumps in operation. Assumptions related to the number of injection pumps operating (i.e., three charging and one SI in this case) affect the mass addition rate and hence the pressurization rate. Assumptions relating to the number of RCPs and RHR pumps in operation affect the dynamic head between the pressure transmitter used for actuating the PORV and the location of interest for the analysis (i.e., most limiting location from a material embrittlement perspective).

The analysis conservatively assumed that only one PORV actuated and, further, did not credit dynamic compensation for this actuation. Dynamic compensation would have resulted in early actuation of the PORV leading to a lower analysis peak pressure. In addition, the analysis did not credit the operation of the RHR system relief valves or the coolant letdown system since these would have also assisted the PORV in limiting the peak pressure. A pressure of 445.9 psig was used to actuate the LTOP system in the new analysis. Thus, the proposed TS limit of 400 psig ensures that an instrument uncertainty value of 45.9 psi, as calculated by the licensee's setpoint methodology procedure, is accounted for. In addition, the static pressure, dynamic pressure, and peak analysis pressure were calculated at the bottom of fuel elevation in the reactor vessel downcomer, which is below the lower circumferential beltline weld of the reactor vessel. The lower circumferential beltline weld of the reactor vessel is the most limiting location from a material embrittlement perspective for HBR. The difference in position (with regard to elevation and flow) between the location at which the peak pressure was calculated and the lower circumferential beltline weld of the reactor vessel results in added conservatism when static and dynamic heads are considered.

To bound the operating range affected by the licensee's request, five separate cases were analyzed. The cases analyzed considered different combinations of maximum and minimum initial RCS pressures, temperatures, and injection water temperatures. The following table summarizing these cases was submitted to the NRC by the licensee in a letter dated April 25, 1997:

LTOP System Analysis Results
For The Temperature Range Of 175°F ≤ T_{cold} ≤ 350°F

Case	Initial Conditions			Total Downcomer Pressure (psig)	P/T Limit (psig)	Margin to Limit (psi)
	Pressure (psig)	Temperature (°F)	SI Temp. (°F)			
A	275	175	38	597.72	602.61	4.89
B	275	175	100	599.25	602.61	3.36
C	400	175	100	599.44	602.61	3.17
D	275	350	100	575.15	813.88	238.73
E	400	350	100	574.57	813.88	239.31

For the range of 160°F to 220°F, plant heatup procedures restrict plant heatup to a maximum rate of 30°F/hour. For this range and heatup rate, an Appendix G P/T limit of 602.61 psig is applied by the licensee. This limit corresponds to the lower end of the range (i.e., 160°F) and is therefore conservative for that range. For the range of 200°F to 170°F, plant cooldown procedures restrict plant cooldown to a maximum rate of 10°F/hour. For this range and cooldown rate, an Appendix G P/T limit of 612.54 psig is applied by the licensee. This limit corresponds to the lower end of the range (i.e., 170°F) and is therefore conservative for that range. For LTOP Cases A, B and C above, the licensee applied the more conservative of the two limits (i.e., the heatup limit of 602.61 psig). This value is consistent with plant operational limitations, is more limiting than the steady state limit, and is therefore acceptable.

For the range of 220°F to 350°F, plant heatup procedures restrict plant heatup to a maximum rate of 60°F/hour. For this range and heatup rate, an Appendix G P/T limit of 813.88 psig is applied by the licensee. This limit corresponds to the lower end of the range (i.e., 220°F) and is therefore conservative for that range. For the range of 350°F to 300°F, plant cooldown procedures restrict plant cooldown to a maximum rate of 60°F/hour. For this range and cooldown rate, an Appendix G P/T limit of 1450 psig is applied by the licensee. This limit corresponds to the lower end of the range (i.e., 300°F) and is therefore conservative for that range. For LTOP Cases D and E above, the licensee applied the more conservative of the two limits (i.e., the heatup limit of 813.88 psig). This value is consistent with plant operational limitations, is more limiting than the steady state limit, and is therefore acceptable.

For all cases, the licensee has shown that the peak pressures achieved remained below their respective P/T limit. The resulting limiting case was Case C from the table, where the initial RCS inlet pressure and temperature were 400 psig and 175°F, respectively, and the SI water temperature was 100°F. This case resulted in an acceptable peak pressure value of 599.44 psig (3.17 psi less than the P/T limit of 602.61 psig at 175°F).

The NRC staff has reviewed the licensee's submittals relating to the mass addition overpressurization analyses for the range of 175°F ≤ T_{cold} ≤ 350°F. Based on our review of this material and the above discussion, the NRC staff finds the licensee's analyses of mass addition overpressurization event acceptable. The staff further concurs with the licensee's conclusions

that the peak pressures achieved in those analyses are below the P/T limits and, therefore, acceptable. The licensee's proposals to: a) amend the LTOP TS to allow one SI pump to be capable of injecting into the RCS when operating within the range of 175°F ≤ T_{cold} ≤ 350°F, and b) change the PORV lift setpoint to ≤ 400 psig; consistent with the licensee's analyses and, therefore, also acceptable.

In addition, for T_{cold} < 175°F the old analysis methodology and therefore limitations of that methodology (including but not limited to the assumption that no SI pumps be capable of injecting into the RCS) remain valid. Therefore, since the new lift setpoint limit of ≤ 400 psig and new instrument uncertainty value of 45.9 psi have been verified by the licensee to give acceptable results, the staff finds the application of this limit to the entire LTOP range, including T_{cold} < 175 psig, acceptable. Note that for T_{cold} < 175 psig the licensee is appropriately maintaining the restriction that none of the SI pumps be capable of injecting into the RCS.

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 1.0 "Use and Application"

Discussion of Change	Summary of Change	ITS Section	CTS Section
1.0 "Use and Application"			
1.1 M1	Definition of $\bar{E}$ was expanded to include weighted average and composition of isotopes excluding iodine instead of average of beta and gamma energy disintegration of the specific activity.	1.1	2.1.4
1.1 M2	Definition for Refueling Operations was expanded to include the time from initial detensioning of the first reactor vessel head closure bolt until the reactor vessel head is unbolted and the time from beginning reinstallation of the first reactor vessel head closure bolt until the reactor vessel head is fully tensioned.	1.1	1.2.6
1.1 M3	Definition for Channel Functional Test was expanded to include specifying the point of test signal injection. The more prescriptive requirement provides for injection of the test signal as close to the sensor as practicable.	1.1	1.6.4

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 2.0 "Safety Limits (SL)"

Discussion of Change	Summary of Change	ITS Section	CTS Section
2.0 "Safety Limits (SL)"			
2.0 M1	The requirements for Reactor Core Safety Limit were expanded to apply to MODE 2 and the reactor is subcritical instead of when the reactor is critical.	2.1.1	2.1
2.0 M2	Requirements when Safety Limits are violated were expanded to include restoration of compliance with the Safety Limit within 5 minutes and specifying a time of one hour to place the unit in MODE 3. The requirement to restore compliance with the Safety Limit and the time to place the unit in shutdown were not previously specified.	2.2	6.7

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.0, "LIMITING CONDITION FOR OPERATION(LCO) APPLICABILITY" page 1 of 1

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.0 M1	If a specification cannot be met and there is no specific action to be taken, the time allowed to reach MODE 3 was limited to seven (7) hours, the time allowed to reach MODE 4 was limited to 13 hours, and the time allowed to reach MODE 5 was limited to 37 hours. The previous times allowed were eight (8) hours to reach hot shutdown and 38 hours to reach cold shutdown.	LCO 3.0.3	3.0
3.0 M2	A requirement was added that prohibits entry into a MODE or other specified condition when a specification is not met and the required action for that specification does not permit entry into the MODE. A requirement was added that prohibited entry into a MODE or specified condition unless the surveillance requirements for the specifications applicable to the MODE or specified condition are met.	LCO 3.0.4 SR 3.0.4	3.0 4.0
3.0 M3	For frequencies of surveillance requirements specified as "once," a requirement was added to clarify that an extension of 25% does not apply.	SR 3.0.2	4.0

MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.1, "REACTIVITY CONTROL SYSTEMS,"

Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.1.1, "SHUTDOWN MARGIN (SDM)"			
3.1 M1	A surveillance requirements was added to verify that Shutdown Margin is within the limits of the Core Operating Limits Report (COLR).	SR 3.1.1.1	3.10.8
LCO 3.1.2, "Core Reactivity"			
3.1 M2	A frequency requirement of prior to entering MODE 1 after each refueling and 31 Effective Full Power Days (EFPDs) thereafter was added to the surveillance requirement to compare actual to predicted boron concentration values. Normalization of predicted values was required to be performed prior to exceeding a fuel burnup of 60 EFPDs.	SR 3.1.2.1	4.9
3.1 M3	Requirements were added that the measured core reactivity be within ± Δk/k of predicted values in MODES 1 and 2, and if not met, to reevaluate design and safety analyses and determine that the core is acceptable for continued operation within 72 hours, establish appropriate operating restrictions within 72 hours, or be in MODE 3 in six (6) hours.	LCO 3.1.2	4.9
LCO 3.1.3, "Moderator Temperature Coefficient (MTC)"			
3.1 M4	The requirements for the Moderator Temperature Coefficient (MTC) lower limit were extended to apply to all of MODE 2 and MODE 3, rather than only to reactor critical and power operations as was previously required.	LCO 3.1.3 Applicability	3.1.3.1
3.1 M6	Surveillance requirements were added that verify that the MTC is within the upper limit once prior to entering MODE 1 after each refueling and verify that MTC is within the lower limit once each cycle.	SR 3.1.3.1 SR 3.1.3.2	3.1.3

Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.1.4, "Rod Group Alignment Limits"			
3.1 M7	The allowed time to restore a rod to within alignment limits was reduced to one (1) hour from two (2) hours.	LCO 3.1.4 Required Action B.1	3.10.1.5
3.1 M9	Requirements were added for the condition when one rod is not within alignment limits to verify that SDM is within the limits of the COLR or initiate boration to restore SDM to within limit within one (1) hour, verify SDM is within limits of the COLR once per 12 hours, reevaluate the safety analyses and confirm results remain valid for duration of operation within 5 days, or if the requirements for a rod not within alignment limits cannot be met, be in MODE 3 in six (6) hours. Requirements were added for the condition when more than one rod that is not within the alignment limit to verify SDM is within the limits of the COLR within one (1) hour, initiate boration to restore SDM to within limit within one (1) hour, and be in MODE 3 in six (6) hours.	LCO 3.1.4 Required Actions B.2.1.1, B.2.1.2, B.2.3, B.2.6, C.1, D.1.1, D.1.2, and D.2	3.10.1.5
3.1 M8	The allowed time to measure the hot channel factors when a rod is not within alignment limits was limited to 72 hours. No time limit previously existed.	LCO 3.1.4 Required Actions B.2.4 and B.2.5	3.10.1.5
3.1 M28	The requirements for rod group alignment limits were made specifically applicable to MODES 1 and 2. No specific reactor condition applied to the rod group alignment limits previously.	LCO 3.1.4 Applicability	3.10.1.5
3.1 M24	A requirement to measure the rod drop time from the point of decay of the stationary gripper coil voltage rather than the beginning of rod motion during the rod drop test. The effect of this change is to slightly decrease the allowed rod drop time.	SR 3.1.4.3	3.10.4.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.1 M29	A requirement was added to the rod drop time surveillance test to measure the time from the fully withdrawn position. No position was previously specified.	SR 3.1.4.3	3.10.4.1
3.1 M26	Requirements were added for the condition when control rod drop times are not within limits to verify SDM is within the limits provided in the COLR within one (1) hour, initiate boration to restore SDM to within the limit within one (1) hour, and the time allowed to reach MODE 3 was limited to six (6) hours rather than eight (8) hours as was previously required.	LCO 3.1.4 Required Actions A.1.1, A.1.2, and A.2	3.10.4.1
3.1 M10	A requirement that allowed continuous operation with one control rod inoperable was deleted.	LCO 3.1.4	3.10.6.2
3.1 M25	Requirements were added for the condition when one or more control rods cannot be moved by its mechanism to restore SDM or verify SDM is within limits within one (1) hour. No completion time previously existed. For the same condition, the time allowed to reach MODE 3 was limited to six (6) hours rather than eight (8) hours as was previously required.	LCO 3.1.4	3.10.6.3
3.1 M11	A requirements was added to the rod exercise test to move control rods at least ten (10) steps during the test. No movement criterion was previously specified.	SR 3.1.4.2	Table 4.1-3 Item 2
3.1 M12	A surveillance requirement was added to verify individual rod positions are within alignment limit every 12 hours.	SR 3.1.4.1	Table 4.1-3
LCO 3.1.5, "Shutdown Bank Insertion Limits"			
3.1 M13	Requirements for the shutdown bank insertion limits were extended to apply to MODES 1 and 2 with any control bank not fully inserted, rather than to reactor critical and power operations.	LCO ...5 Applicability	3.1.5

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.1 M14	Requirements were added for the condition where one or both shutdown banks are not within limits to verify SDM is within the limits in the COLR within one (1) hour or initiate boration to restore SDM to within limits within one (1) hour, and to restore shutdown banks to within limits in two (2) hours. The time allowed to reach MODE 3 with one or more shutdown banks not within limits was limited to six (6) hours rather than eight (8) hours as previously required.	LCO 3.1.5 Required Actions A.1.1, A.1.2, A.2, and B.1	3.10.1
3.1 M15	A surveillance requirement to verify each shutdown bank is within limits specified in the COLR every 12 hours was added.	SR 3.1.5.1	3.10.1
LCO 3.1.6, "Control Bank Insertion Limits"			
3.1 M16	Requirements to maintain control rods within insertion, sequence and overlap limits specified in the COLR were added.	LCO 3.1.6	3.10.1.3
3.1 M17	Requirements were added for the condition when control bank insertion limits are not met to verify SDM is within the limits of the COLR within one (1) hour, initiate boration to restore SDM within one (1) hour, and restore control banks within limits within two (2) hours. Similarly, requirements were added for the condition when control bank sequence or overlap limits are not met to verify SDM is within the limits of the COLR within one (1) hour, initiate boration to restore SDM within one (1) hour, and restore control banks within limits within two (2) hours.	LCO 3.1.6 Required Actions A.1.1, A.1.2, B.1.1, B.1.2, B.2.2, and B.2.3	3.10.1
3.1 M18	Surveillance requirements were added to verify that estimated critical control bank position is within limits specified in the COLR within four (4) hours prior to achieving criticality, each control bank insertion is within the limits specified in the COLR every 12 hours, and sequence and overlap limits specified in the COLR are met for control banks not fully inserted in the core every 12 hours.	SR 3.1.6.1 SR 3.1.6.2 SR 3.1.6.3	3.10.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.1.7, "Rod Position Indication"			
3.1 M27	A requirement was added to perform the surveillance requirement to compare analog rod position indication and bank demand position indication once within four (4) hours following rod motion in excess of six (6) inches when the rod position deviation monitor is inoperable.	SR 3.1.7.1	Table 4.1-1 Items 9 and 10
LCO 3.1.8, "Physics Test Exceptions-MODE 2"			
3.1 M20	Requirements were added for the condition that the SDM is not within limits during physics tests to initiate boration to restore SDM to within limit within 15 minutes, and to suspend physics tests within one (1) hours. A requirement was added for the condition that the thermal power is not less than or equal to 5% rated thermal power to immediately open the reactor trip breakers. A requirement was added for the condition that the lowest Reactor Coolant System (RCS) loop average temperature is not within limit to restore the RCS lowest average loop temperature to within limit within 15 minutes or be in MODE 3 within 15 minutes.	LCO 3.1.8 Required Actions A.1, A.2, B.1, C.1, and D.1	3.10.1
3.1 M21	Surveillance requirements were added during physics tests to perform a channel calibration on power range and intermediate range channels within 7 days prior to initiation of physics tests, to verify the RCS lowest loop average temperature is $\geq$ 530°F every 30 minutes, verify thermal power is $\leq$ 530°F 5% rated thermal power every 30 minutes, and to verify that SDM is within the limits of the COLR every 24 hours.	SR 3.1.8.1 SR 3.1.8.2 SR 3.1.8.3 SR 3.1.8.4	3.10.1
3.1 M23	An allowance for the SDM not to meet the limits in the COLR during physics tests while measuring control rod worth and SDM was deleted.	LCO 3.1.8	3.10.1.6

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.2, "REACTIVITY CONTROL SYSTEMS"

Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.2.1, "Heat Flux Hot Channel Factor"			
3.2 M1	An exception from meeting heat flux hot channel factor limits during physics tests was deleted.	LCO 3.2.1	3.10.3.1
3.2 M2	Requirements were added for the condition when the heat flux hot channel factor is not within limits to reduce the power range high neutron flux setpoint by ≥ 1% for each 1% that the factor exceeds the limit within 72 hours, and to verify that heat flux hot channel factor is within limits prior to increasing thermal power above the required action value. The allowed time to reach MODE 2 if the requirements for heat flux hot channel factor outside of limits cannot be met was limited to six (6) hours instead of eight (8) hours as previously required.	LCO 3.2.1 Required Actions A.2.2, A.2.4, B.1	3.10.2.1
3.2 M3	Requirements were added to verify that the heat flux hot channel factor is within limit once after each refueling outage prior to exceeding 75% rated thermal power, and once within 12 hours after achieving equilibrium conditions after exceeding by ≥ 10% rated thermal power the thermal power at which the heat flux hot channel was last determined.	SR 3.2.1.1	3.10.2.1.1
3.2 M28	An allowance to not reduce the overpower and overtemperature ΔT setpoints ". . .if subsequent incore mapping . . ." demonstrate that the hot channel factors are not met is deleted.	LCO 3.2.1 Required Action A.2.3	3.10.2.1.1
3.2 M4	A requirement was added to reduce the AFD target band limits to restore the heat flux hot channel factor to within limits within 15 minutes was added.	LCO 3.2.1 Required Action A.1	3.10.2.2.1

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.2, "REACTIVITY CONTROL SYSTEMS"

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.2 M5	A time limit of 30 minutes was imposed upon the requirement to reduce thermal power when the heat flux hot channel factor exceeds the limits specified in the Core Operating Limits Report (COLR).	LCO 3.2.1 Required Action A.2.1	3.10.2.2.1
3.2 M6	An allowance to raise thermal power above the thermal power limits specified when the heat flux hot channel factor is not within limits by utilization of the Axial Power Distribution Monitoring System (APDMS) was deleted. Requirements for the APDMS that, when in operation, permit less restrictive thermal power limits were deleted.	LCO 3.2.1	3.10.2.2.1 3.10.2.2.2 4.11
LCO 3.2.2, "Nuclear Enthalpy Rise hot Channel Factor"			
3.2 M7	An exception from meeting nuclear enthalpy rise hot channel factor limits during physics tests was deleted.	LCO 3.2.2	3.10.2.1
3.2 M8	A requirements was added to the surveillance to verify the nuclear enthalpy rise hot channel factor is within limits to perform the surveillance once after each refueling outage prior to thermal power exceeding 75% rated thermal power. No power limit previously existed.	SR 3.2.2.1	3.10.2.1.1
3.2 M9	The allowed time for reducing thermal power and the high neutron flux setpoints when the nuclear enthalpy rise hot channel factor exceeds limits was limited to four (4) hours and 72 hours, respectively. No time limits existed previously.	LCO 3.2.2 Required Action A.1.1, A.1.2.1, and A.1.2.2	3.10.2.1.1
3.2 M10	The requirements for reducing thermal power and the high neutron flux setpoints by a fraction relating to the degree to which the nuclear enthalpy rise hot channel factor exceeds limits was changed to a requirement to reduce power to less than 50% rated thermal power and to reduce the high neutron flux setpoints to $\leq$ 55% rated thermal power.	LCO 3.2.2 Required Action A.1.2.1 and A.1.2.2	3.10.2.1.1

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.2, "REACTIVITY CONTROL SYSTEMS"

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.2 M11	Requirements were added for when the nuclear enthalpy hot channel factor exceeds limits to verify the heat flux hot channel factor is within limits within 24 hours, verify the nuclear enthalpy rise hot channel factor is within limits prior to thermal power exceeding 50% rated thermal power and prior to thermal power exceeding 75% rated thermal power and 24 hours after thermal power reaches ≥ 95 % rated thermal power, and if the requirements to restore nuclear enthalpy rise hot channel factor cannot be met, to be in MODE 2 in six (6) hours.	LCO 3.2.2 Required Action A.2, A.3, and B.1	3.10.2.1.1
3.2 M12	A requirement was added to a surveillance note to reverify that the heat flux hot channel factor is within limits in the event that the nuclear enthalpy rise hot channel factor shows and increasing trend.	SR 3.2.2.1	3.10.2.2.2
LCO 3.2.3, "Axial Flux Difference (AFD) (PDC-3 Axial offset Control Methodology)			
3.2 M13	A time limit of once within 31 Effective Full Power Days (EFPDs) after each refueling was imposed on the requirement to determine the target flux difference of each operable excore channel.	SR 3.2.3.3	3.10.2.3
3.2 M14	An exception from meeting axial flux difference requirements during physics tests was deleted.	LCO 3.2.3	3.10.2.5
3.2 M15	A requirement maintain axial flux difference within acceptable operation limits specified in the COLR was added.	LCO 3.2.3	3.10.2.5
3.2 M16	The requirements for axial flux difference were extended to apply to MODE 1 with thermal power greater than 15% rated thermal power, rather than to greater than 50% rated thermal power as previously required.	LCO 3.2.3 Applicability	3.10.2

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.2, "REACTIVITY CONTROL SYSTEMS"

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.2 M17	The time allowed to reduce thermal power to less than 90% rated thermal power or 0.9 Allowable Power Level (APL) whichever is less was limited to 15 minutes. No time requirement previously existed.	LCO 3.2.3 Required Action B.1	3.10.2.6
3.2 M18	A requirement to reduce thermal power to less than 15 % rated thermal power within nine (9) hours was added for the condition when requirements to reduce thermal power or restore cumulative penalty deviation time to less than one (1) are not met. A surveillance requirement to verify that axial flux difference is within limits for each excore channel every seven (7) days was added.	LCO 3.2.3 Required Action D.1 SR 3.2.3.1	3.10.2
3.2 M19	The requirements for the accumulation of penalty deviation time were extended to apply to greater than or equal to 50% rated thermal power rather than greater than 50% rated thermal power as previously required.	LCO 3.2.3	3.10.2.8
3.2 M20	A requirement was added to log axial flux difference once within 15 minutes and every 15 minutes thereafter when the axial flux difference alarms are out of service and the reactor is ≥ 90% rated thermal power or 0.9 APL.	SR 3.2.3.2	3.10.2.10
3.2 M21	The time allowed after refueling to perform the surveillance requirement to determine the target flux difference of each excore channel was limited to 31 EFPDs. No time limit existed previously.	SR 3.2.3.3	3.10.2.1.1
LCO 3.2.4, "Quadrant Power Tilt Ratio"			
3.2 M22	An exception from meeting Quadrant Power Tilt Ratio (QPTR) requirements during physics tests was deleted.	LCO 3.2.4	3.10.3.1
3.2 M23	An allowed time to restore QPTR to within limits without taking any other actions was eliminated.	LCO 3.2.4	3.10.3.1

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.2, "REACTIVITY CONTROL SYSTEMS"

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.2 M24	The time allowed to reduce thermal power when QPTR is in excess of limits was limited to two (2) hours. No time limit previously existed.	LCO 3.2.4 Required Actions A.1	3.10.3.1
3.2 M25	The required power reduction when QPTR exceeds limits was increased from two (2) percent for each percent that QPTR exceeds 1.02 to three (3) percent for each percent that QPTR exceeds 1.02.	LCO 3.2.4 Required Action a.1	3.10.3
3.2 M26	Requirements were added where none existed previously as follows. The QPTR is required to be ≤ 1.02. If QPTR is not within the limit, the QPTR is required to be determined once per 12 hours and thermal power further reduced by ≥ 3% for each 1% that QPTR is greater than 1.00. the hot channel factors are required to be verified within limits within 24 hours and once per seven (7) days thereafter, the safety analyses are required to be reevaluated for continuous operation prior to increasing thermal power above the restricted levels, the excore detectors are required to be normalized to show zero QPTR prior to increasing power above the restricted levels, and the hot channel factors are required to be verified within limits within 24 hours of reaching rated thermal power or within 48 hours of increasing thermal power above the restricted levels. Surveillance requirements were added to verify that QPTR is within the limit by calculation every seven (7) days and once within 12 hours and every 12 hours thereafter when the QPTR alarm is out of service and to verify QPTR is within the limit by using the incore detectors once within 12 hours and every 12 hours thereafter when one or more power range neutron flux channels are inoperable and thermal power is ≥ 75% rated thermal power.	LCO 3.2.4 Required Actions A.2, A.3, A.4, A.5, and A.6 SR 3.2.4.1 SR 3.2.4.2	3.10.3

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.2, "REACTIVITY CONTROL SYSTEMS"

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.2 M27	Requirements were added for the surveillance requirement in the condition when one excore detector is out of service, that the remaining three excore detectors may be used to calculate QPTR if reactor power is less than 75% rated thermal power. No power restriction previously applied.	SR 3.2.4.1	1.8

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.3.1, "RPS Instrumentation"			
3.3 M1	Trip setpoints have been specified in accordance with the licensee setpoint methodology procedure. The setpoints are more restrictive.	LCO 3.3.1 Table 3.3.1-1 Functions 2, 3, 4.a, 4.b, 5, 6, 7, 8, 9, 11, 12, 13, 14, 15 & 17	2.3.1.2 2.3.1.3
3.3 M2	The allowed time for an inoperable channel was restricted immediately where no allowed time was previously specified.	LCO 3.3.1 Required Actions A and I	3.5.1.5 Table 3.5-2 Action 4
3.3 M3	When the required number of source range monitors cannot be met, requirements were added to suspend activities involving positive reactivity addition immediately, and to close unborated water source isolation valves in one (1) hour.	LCO 3.3.1 Required Action L	Table 3.5-2 Action 5
3.3 M4	The allowed time before the unit must be shut down when an inoperable channel is not placed in trip was reduced from eight (8) hours to six (6) hours.	LCO 3.3.1 Required Action D & E	3.0 Table 3.5-2 Action 6
3.3 M6	A requirement was added to reach MODE 3 in 12 hours for an inoperable excore channel.	LCO 3.3.1 Required Action E	Table 3.5-2 Table Notation ACTION 2.b
3.3 M7	Requirements were added to require the unit be placed within either the range of the source range instrumentation or the power range instrumentation within two (2) hours.	LCO 3.3.1 Required Action F	Table 3.5-2 ACTION 3.b

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.3 M8	The allowed time to restore an inoperable channel of automatic trip logic to OPERABLE status was restricted to six (6) hours from 12 hours and if not restored, the allowed time to reach MODE 3 was restricted to six (6) hours from eight (6) hours. The allowed time to restore an inoperable reactor trip breakers (RTBs) to OPERABLE status was reduced from 12 hours to one (1) hour and if not restored, the allowed time was reduced from eight (8) hours to six (6) hours to place the unit in MODE 3.	LCO 3.3.1 Required Action Q and R	3.10.5.2
3.3 M9	The requirements for the reactor protection system (RPS) were increased to include the RTBs, RTB UV & shunt trip mechanisms and Automatic Trip functions in MODES 3, 4 and 5 including associated requirements when the RTBs are closed.	LCO 3.3.1 Required Action C & V; Table 3.3.1-1 Functions 18, 19 & 20	3.10
3.3 M10	The allowed times when the RTB trip mechanism is inoperable were limited to require the unit be placed in MODE 3 in 54 hours and RTB opened within 55 hours instead of hot shutdown within 56 hours.	LCO 3.3.1 Required Action U	3.10.5.3
3.3 M11	Requirements were added for two inoperable source range instruments; one inoperable P-6 or P-10 interlock; one inoperable P-7, P-8 and turbine impulse pressure interlock; and two inoperable RPS trains	LCO 3.3.1 Required Actions J, S, T and V	3.10
3.3 M12	Allowable Values were established that are more restrictive than the current technical specifications for RPS Instrumentation, ESFAS Instrumentation and AFW System Instrumentation in accordance with the company setpoint methodology.	LCO 3.3.1 Table 3.3.1-1	3.10
3.3 M13	Requirements added for reactor coolant pump breaker position (single loop and two loops); safety injection input from ESFAS; and RPS interlocks for intermediate range neutron flux, P-7, P-8, P-10 and turbine impulse pressure.	Table 3.3-1 Functions 10, 16 & 17	3.10

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.3 M14	Surveillance requirements were added requiring comparison of incore measurement results to NIS axial flux difference and calibration of the excore nuclear instrument channels to agree with $OT_{\Delta}T$ and $OP_{\Delta}T$ functions. Surveillance requirements were added requiring CHANNEL CHECKS, Channel Operational Tests (COTs) and CHANNEL CALIBRATION for the Power Range Neutron Flux-Low function. Surveillance requirements were added requiring a TADOT for the Reactor Coolant Pump (RCP) breaker position, Surveillance requirements were added requiring a COT for the RPS interlock function P-6, P-8 and P-10 functions. Safety Injection (SI) input from ESFAS functions and the RPS P-7 interlock.	SR 3.3.1.3 SR 3.3.1.6 SR 3.3.1.1 SR 3.3.1.8 SR 3,3,1,11 SR 3.3.1.13 SR 3.3.1.14	Table 4.1-1
3.3 M15	Surveillance Frequency requirements were added for a COT of the Nuclear Intermediate Range and Nuclear source range instrumentation to include within four (4) hours after reducing power below P-10, within four (4) hours after reducing power below P-6 if the COT has not been performed in the previous 92 days, and every 92 days thereafter.	SR 3.3.1.8	Table 4.1-1 Items 2 and 3
3.3 M16	A surveillance requirement was added to perform a CHANNEL CALIBRATION for the Nuclear Intermediate Range and Nuclear Source Range instruments every 18 months.	SR 3.3.1.11	Table 4.1-1 Items 2 and 3
3.3 M17	Surveillance requirements were added to perform a TADOT for the Turbine Trip Logic prior to startup if not performed in the previous 31 days and a CHANNEL CALIBRATION every 18 months.	SR 3.3.1.15 SR 3.3.1.10	Table 4.1-1 Item 22
3.3 M18	Surveillance requirements were extended to apply to MODES 1, 2, 3, 4, and 5 when the RTBs are closed for performance of an ACTUATION LOGIC TEST every 31 days on a staggered test basis. The previous requirement required a similar surveillance during hot shutdown and power operation only.	SR 3.3.1.5	Table 4.1-1 Item 27

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.3 M19	Surveillance requirements were extended to apply to MODES 1, 2, 3, 4, and 5 when the RTBs are closed for performance of an ACTUATION LOGIC TEST every 31 days on a staggered test basis. The previous requirement required a similar surveillance prior to startup when not tested in the previous month.	SR 3.3.1.5 SR 3.3.2.2	Table 4.1-1 Item 27
3.3 M20	Trip setpoint values were added for intermediate range neutron flux, source range neutron flux, steam generator water level and turbine trip (low oil pressure and turbine stop valve closure.	LCO 3.3.1 Table 3.3.1-1 Function 3, 4, 14 and 15.	2.3.1
3.3 M21	Surveillance requirements were added to perform a CHANNEL CHECK for Steam/Feedwater Flow Mismatch and Low Steam Generator Level.	SR 3.3.1.1	Table 4.1-1 Items 39 and 40
3.3 M49	The allowed time to place the plant in MODE 3 was reduced from eight (8) hours to immediately open the RTBs.	LCO 3.3.1 Required Action J.1	Table 3.5-2 Require Actions 4, 5, 8
3.3 M50	The requirements for Reactor Coolant Flow - Low, single loop, trip were extended to apply to the range of MODE 1 power operation between the P-8 setpoint at approximately 40% rated thermal power (RTP) and 45% RTP.	LCO 3.3.1 Table 3.3.1-1 Function 9. Footnote (g)	Table 3.5-2 Function 10A
LCO 3.3.2, "ESFAS Instrumentation"			
3.3 M1	Trip setpoints have been specified in accordance with the licensee setpoint methodology procedure. The setpoints are more restrictive.	LCO 3.3.2 Table 3.3.2-1 Functions 1.c, 1.d, 1.e, 1.f, 1.g, 2.c, 3.b.3, 4.c, 4.d, 4.e & 6	Table 3.5-1 Items 1, 2, 3, 4, and 5

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.3 M2	The allowed time for an inoperable channel was restricted immediately where no allowed time was previously specified.	LCO 3.3.2 Required Action A	3.5.1.5 Table 3.5.2 Action 4
3.3 M12	Allowable Values were established that are more restrictive than the current technical specifications for RPS Instrumentation, ESFAS Instrumentation and AFW System Instrumentation in accordance with the company setpoint methodology.	LCO 3.3.2 Table 3.3.2-1	N/A
3.3 M19	Surveillance requirements were extended to apply to MODES 1, 2, 3, and in one case MODE 4 for performance of an ACTUATION LOGIC TEST every 31 days on a staggered test basis. The previous requirement required a similar surveillance prior to startup when not tested in the previous month.	SR 3.3.2.2	Table 4.1-1 Item 27
3.3 M22	The allowed time to reach MODE 3 was limited to six (6) hours rather than eight (8) hours as was previously required for an inoperable channel or train of the manual SI actuation function and the Manual Containment Phase A isolation function.	LCO 3.3.2 Required Action B	Table 3.5-3 ACTION 11
3.3 M23	The allowed time to reach MODE 3 was limited to six (6) hours rather than eight (8) hours and to reach MODE 5 was limited to 36 hours rather than 38 hours for inoperable channels in which the time to place the channel in trip cannot be met.	LCO 3.3.2 Required Actions C, D, E, and G	Table 3.5.3 ACTION 12
3.3 M24	The allowed time to reach MODE 3 was limited to seven (7) hours rather than eight (8) hours and to reach MODE 5 was limited to 37 hours rather than 38 hours for an inoperable manual initiation channel in which the time to restore the channel to operable status cannot be met.	LCO 3.3.2 Required Action I	Table 3.5-3 Item 2.a

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.3 M25	The allowed time to reach MODE 3 was limited to six (6) hours rather than 24 hours plus the time required to bring the plant to hot shutdown utilizing normal operating procedures when a channel of main steam line isolation is not restored to OPERABLE status in the required time period. The allowed time to reach MODE 4 was limited to 60 hours rather than 72 hours when a channel of main steam line isolation is not restored to OPERABLE status in the required time period.	LCO 3.3.2 Required Action F	Table 3.5-4 Item 2.d
3.3 M26	The allowed time between surveillances for the containment isolation trip function were limited to 18 months rather than refueling interval. The length of time between refueling intervals was not specified in the previous requirements.	SR 3.3.2.6	Table 4.1-3 Item 5
3.3 M27	Requirements were added for one inoperable channel of Pressurizer Pressure-Low and T_{avg}-Low interlock to verify the interlocks are in required state. Surveillance requirements were added to perform a CHANNEL CHECK, MASTER RELAY TEST, SLAVE RELAY TEST and CHANNEL CALIBRATION on ESFAS instrumentation. Requirements added for the setpoints for ESFAS interlocks which did not exist previously.	LCO 3.3.2 Required Action H SR 3.3.2.1 SR 3.3.2.3 SR 3.3.2.4 SR 3.3.2.5 SR 3.3.2.7 Table 3.3.2-1 Item 6	Table 3.5-4

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.3.3, "PAM Instrumentation"			
3.3 M28	The requirements for Post Accident Monitoring (PAM) Instrumentation were extended to apply to MODES 1, 2, 3, rather than during power operations.	LCO 3.3.3	3.5.1.2
3.3 M31	The allowed time to restore inoperable containment hydrogen channel to OPERABLE status was limited to 72 hours rather than 14 days as was previously required.	LCO 3.3.3 Required Action E	Table 3.3-5 Note 6
3.3 M32	Requirements were added for additional PAM functions of Steam generator Pressure and Level, Containment Spray Additive Tank Level, Containment Isolation Valve Position, Power Range and Source Range Neutron Flux, RCS pressure, Hot and Cold leg temperature, Refueling Water Storage tank and Condensate Storage tank level.	LCO 3.3.3 Table 3.3.3-1	N/A
3.3 M33	The allowed time to reach MODE 3 was reduced to six (6) hours and MODE 4 to 12 hours from 12 hours and 42 hours, respectively, when a thermocouple is not restored to OPERABLE status in the required time period.	LCO 3.3.3 Required Action G	Table 3.5-5 Note 8
3.3 M47	The allowed outage time for one inoperable channel of containment hydrogen monitors was limited to 30 days rather than allow continuous operation with one channel out of service.	Table 3.3.3-1 Item 11	Table 3.5-5 Function 11
LCO 3.3.4, "Remote Shutdown System"			
3.3 M35	Requirements were added for the Remote Shutdown System. No requirements existed previously.	LCO 3.3.4	Table 4.1-1

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.3.5, "LOP DG Start Instrumentation"			
3.3 M36	The requirements for loss of voltage and degraded voltage instrumentation were extended to apply to MODES 1, 2, 3, and 4 rather than reactor critical.	LCO 3.3.5	Table 3.5-3 Items 3A and 3B
3.3 M37	A requirement was added to restore all but one degraded voltage channel to OPERABLE status within one (1) hour if two or more channels are inoperable.	LCO 3.3.5 Required Action C	Table 3.5-3
LCO 3.3.6, "Containment Ventilation Isolation Instrumentation"			
3.3 M38	A requirement was added to enter applicable requirements for an inoperable containment penetration when one or more functions or radiation monitoring channels of the containment ventilation isolation instrumentation system is inoperable.	LCO 3.3.6 Required Action A.2	Table 3.5-4 ACTION 15
3.3 M40	The requirements for Containment Ventilation Isolation Instrumentation were extended to apply to core alterations or during movement of irradiated fuel assemblies inside containment.	LCO 3.3.6 Table 3.3.6-1 Functions 3.a & 3.b	3.5.1.4 Table 3.5-4 Items c.i and c.ii
3.3 M41	Surveillance Requirements were added for the Automatic Actuation Logic and Actuation relays function including associated surveillance requirements for a ACTUATION LOGIC TEST, MASTER RELAY TEST and SLAVE RELAY TEST.	LCO 3.3.6 Table 3.3.6-1, Function 2 SR 3.3.6.2 SR 3.3.6.3 SR 3.3.6.5	Table 3.5-4
3.3 M42	Surveillance requirements were added to perform a CHANNEL CHECK, COT, TADOT and CHANNEL CALIBRATION for the containment ventilation isolation system.	SR 3.6.6.1 SR 3.6.6.4 SR 3.6.6.6 & Note SR 3.6.6.7	3.8

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.3.7, "CREFS Actuation Instrumentation"			
3.3 M43	Requirements were added for the CREFS Actuation Instrumentation System. No requirements existed previously.	LCO 3.3.7	3.5
LCO 3.3.8, "AFW System Instrumentation"			
3.3 M12	Allowable Values were established that are more restrictive than the current technical specifications for RPS Instrumentation, ESFAS Instrumentation and AFW System Instrumentation in accordance with the company setpoint methodology.	LCO 3.3.8 Table 3.3.8-1	Table 3.4-2
3.3 M44	A completion time to reach MODE 3 was imposed of six (6) hours and a requirement was added to reach MODE 4 was imposed of 12 hours rather than no specified times for either MODE, when AFW pump start instrumentation is not restored to OPERABLE status within required time of 48 hours.	LCO 3.3.8 Required Action D & E	Table 3.4-1 Note 2
3.3 M48	The completion time to reach MODE 3 was reduced to six (6) hours from eight (8) hours and a requirement was added to reach MODE 4 in 12 hours when AFW undervoltage channel instrumentation is not restored to OPERABLE status within required time of 48 hours.	LCO 3.3.8 Required Action B	Table 3.4-1 Note 1
3.3 M51	The allowance for one channel of steam generator water low low level to be inoperable continuously was eliminated and an allowed outage time of for one inoperable channel was imposed.	LCO 3.3.8 Table 3.3.8-1 Function 1	Table 3.4-1 Function 1

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.4, "REACTOR COOLANT SYSTEM"

Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.4.1, "RCS Pressure, Temperature, and Flow Departure from Nucleate Boiling (DNB) Limits"			
3.4 M1	A new specification for Reactor Coolant System (RCS) pressure, temperature and flow to be within limits was added. No requirements for these values previously existed.	LCO 3.4.1	3.1
LCO 3.4.2, "RCS Minimum Temperature for Criticality"			
3.4 M2	The allowed minimum temperature for criticality was limited to greater than or equal to 530°F. Lower temperature values for minimum temperature for criticality were previously allowed.	LCO 3.4.2	3.1.3.2
3.4 M3	The time required to reach subcritical conditions when the reactor is critical and the minimum temperature for criticality was not met was restricted to 30 minutes from the previous requirement of 8 hours. A surveillance requirement to verify that the minimum temperature for criticality is met was added.	LCO 3.4.2 Required Action A.1	3.1.3.2
3.4 M4	Requirements were added for failure to meet RCS Pressure, RCS Temperature, and RCS Heatup and Cooldown rate limits to restore parameters to within limits in 30 minutes, to determine if the RCS is acceptable for continued operation, to bring the unit to MODE 3 in 6 hours and MODE 5 with RCS pressure less than 400 psig in 36 hours if completion times are not met, and to restore parameters to within limits immediately and determine if the RCS is acceptable for continued operation prior to entering MODE 4 when the unit is not in MODES 1, 2, 3, or 4. A surveillance requirement was added to verify that RCS pressure, RCS temperature, and RCS heatup and cooldown rates are within limits every 30 minutes during RCS heatup, RCS cooldown and RCS inservice and hydrostatic testing.	LCO 3.4.3 Required Actions A.1, A.2, B.1, B.2, C.1, and C.2 SR 3.4.3.1	3.1.2.1
LCO 3.4.4, "RCS Loops-MODES 1 and 2			

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.4 M5	The requirements for maintaining three RCS loops operable and in operation were extended to apply to MODES 1 and 2, rather than only to power operation as previously existed.	LCO 3.4.4, Applicability	3.1.1.1 3.3.1.1
3.4 M6	The time requirement to bring the unit to MODE 3 was reduced to 6 hours from 8 hours and a surveillance requirement to verify that each RCS loop is in operation every 12 hours was added.	LCO 3.4.4 Required Action A.1 SR 3.4.4.1	3.1.1.1
3.4 M7	The requirements for maintaining two RCS loops operable and in operation were extended to apply to MODE 3, rather than only to reactor power greater than or equal to 2% rated thermal power.	LCO 3.4.4 Applicability	3.1.1.1
LCO 3.4.5, "RCS Loops-MODE 3" LCO 3.4.6, "RCS Loops-MODE 4" LCO 3.4.7, "RCS Loops-MODE 5, Loops Filled" LCO 3.4.8, "RCS Loops-MODE 5, Loops Not Filled"			
3.4 M8	Requirements are added to de-energize all control rod drive mechanisms immediately, suspend all operations involving a reduction of RCS boron concentration immediately, and initiate action to restore one RCS loop to operable status and operation immediately. Surveillance requirements are added to verify required RCS loops in operation, verify that steam generator secondary side water levels are ≥ 16%, verify that the rod control system is not capable of rod withdrawal when required, verify that the reactor trip breakers are open when required, and verify that the lift disconnect switches are open for all control rods not fully withdrawn when required, all every 12 hours.	LCO 3.4.5 Required Action D.1, D.2, D.3 SR 3.4.5.1 SR 3.4.5.2 SR 3.4.5.3 SR 3.4.5.4 SR 3.4.5.5 SR 3.4.5.6 SR 3.4.5.7	3.1.1.1
3.4 M38	A NOTE is added to the specifications that restricts operation with less than two RCS Loops in operation under certain conditions to a maximum of 1 hour.	LCO 3.4.5 NOTE LCO 3.4.6 NOTE 1 LCO 3.4.7 NOTE 1	3.1.1.1

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.4, "REACTOR COOLANT SYSTEM"

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.4 M36	The requirement for two steam generators to be operable in MODE 3 is extended to apply to two RCS Loops which includes two Reactor Coolant Pumps (RCPs).	LCO 3.4.5	3.1.1.2
3.4 M9	The requirements for one RCS loops or RHR trains were restricted to apply only to MODE 4 rather than for RCS temperature ≥ 200°F and reactor power less than 2% rated thermal power as was previously required.	LCO 3.4.6, Applicability	3.1.1.1
3.4 M10	The requirements for operable RCS loops and/or RHR trains in MODE 4 were extended to apply to two loops or trains, rather than to one RCS loop or RHR train as was previously required.	LCO 3.4.6	3.1.1.1
3.4 M11	A requirement was added to initiate action immediately to restore a second RCS loop or RHR train to operable status if one required loop or train is inoperable and one RCS loop is operable. A requirement was added to be in MODE 5 in 24 hours if one required loop or train is inoperable and one RHR train is operable. The time allowed to restore one inoperable loop or train to operable status was restricted to immediately, rather than 14 days as was previously allowed. The time allowed to suspend all operations involving reduction of boron concentration was restricted to immediately. Surveillance requirements were added to verify one RHR train or RCS loop is in operation every 12 hours, verify that the secondary side water levels are ≥ 16% for required RCS loops every 12 hours, and to verify correct breaker alignment and indicated power are available to the required pump that is not in operation every 7 days.	LCO 3.4.6 Required Actions A.1, B.1, C.1 and C.2 SR 3.4.6.1, SR 3.4.6.2, SR 3.4.6.3	3.1.1.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.4 M12	A Note was added which restricted removal of both RHR loops from operation in MODE 4 durir g heatup to only when at least one RCS loop is in operation. Surveillance requirements were added to verify that one RHR train is in operation every 12 hours, verify that the steam generator secondary side water level is ≥ 16% in the required steam generator every 12 hours, and verify that the correct breaker alignment and indicated power are available to the required RHR pump that is not in operation every 7 days.	LCO 3.4.7 NOTE 4 SR 3.4.7.1 SR 3.4.7.2 SR 3.4.7.3	3.3.1.4
3.4 M14	Requirements were added to suspend all operations involving a reduction of RCS boron concentration immediately and initiate action to restore one RHR train to operable status and in operation immediately when required RHR trains are inoperable or no RHR train is in operation.	LCO 3.4.7 Required Actions B.1 and B.2 LCO 3.4.8 Required Actions B.1 and B.2	3.3.1.4
3.4 M15	A requirement for one RHR train to be in operation was added for MODE 5 specifications.	LCO 3.4.7 LCO 3.4.8	3.3.1.4
3.4 M39	The time requirement to restore an inoperable RHR train to operable status was restricted to immediately, rather than 14 days as was previously allowed. A requirement was added to restore required steam generator secondary side water level to within limits immediately if the water level is not within limits.	LCO 3.4.7 Required Actions A.1 and A.2	3.3.1.4
3.4 M16	Surveillance requirements were added to verify that one RHR train is in operation every 12 hours, and to verify that the correct breaker alignment and indicated power are available to the RHR pump that is not in operation every 7 days.	SR 3.4.8.1 SR 3.4.8.2	3.3.1.4
LCO 3.4.9, "Pressurizer"			

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.4 M17	The requirements for the pressurizer were extended to apply to MODE 3, rather than only to reactor subcriticality less than 1% as was previously required.	LCO 3.4.9 Applicability	3.1.3.4
3.4 M18	The time to reach MODE 3 was limited to 6 hours and the time to reach MODE 4 was limited to 12 hours when the pressurizer heaters and emergency power supplies cannot be restored within the allowed times. Completion times for these actions did not previously exist.	LCO 3.4.9 Required Actions D.1 and D.2	3.1.1.3
3.4 M19	Requirements were added to be in MODE 3 with the reactor trip breakers open and to be in MODE 4 in 12 hours when the pressurizer water level is not within limits.	LCO 3.4.9 Required Actions A.1 and A.2	3.1.1.3
LCO 3.4.10, "Pressurizer Safety Valves"			
3.4 M20	Requirements were added to restore one inoperable pressurizer safety valve to operable status within 15 minutes or if not restored within 15 minutes, or if two or more safety valves are inoperable, be in MODE 3 in 6 hours and MODE 4 in 12 hours.	LCO 3.4.10 Required Actions A.1, B.1 and B.2	3.1.1.3
LCO 3.4.11, "Pressurizer Power operated relief Valves (PORVs)"			

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.4, "REACTOR COOLANT SYSTEM"

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.4 M21	The time to reach MODE 3 was limited to 6 hours and the time to reach MODE 4 was limited to 12 hours when one or both pressurizer PORVs are inoperable and cannot be manually cycled, and the associated block valves cannot be closed and power removed within one hour. The time to reach MODE 3 was limited to 6 hours and the time to reach MODE 4 was limited to 12 hours when both pressurizer block valves are inoperable and cannot be manually cycled, and the associated PORVs cannot be placed in manual control in one hour or one block valve cannot be restored in two hours. Completion times for these actions were previously 12 hours to reach MODE 3 and 24 hours to reach MODE 4.	LCO 3.4.11 Required Actions D.1, D.2, E.3, E.4, G.1, and G.4	3.1.1.5
3.4 M22	A note was deleted that allowed power operation to continue with a pressurizer block valve closed to isolate minor leakage from the associated PORV.	LCO 3.4.11	3.1.1.5
3.4 M23	An exception to entering required actions when performing surveillance testing on the pressurizer PORVs and associated block valves was deleted.	LCO 3.4.11	3.1.1.5
LCO 3.4.12, "Low Temperature Overpressure Protection (LTOP) System"			
3.4 M35	The setpoint for the LTOP System was lowered from 420 psig to 400 psig with an allowable value of 418 psig.	LCO 3.4.12	3.1.2.1
3.4 M24	The time allowed to depressurize the RCS and establish a vent to the containment when two PORVs are inoperable, or when LTOP cannot be restored to operable status as required, was restricted to 8 hours rather than 12 hours as was previously required.	LCO 3.4.12 Required Action G.1	3.1.2.1

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.4, "REACTOR COOLANT SYSTEM"

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.4 M25	Requirements were added to the LTOP specification as follows which did not exist previously. The accumulator isolation valves are required to be closed and deactivated in accordance with conditions in a NOTE. If two or more Safety injection (SI) pumps are capable of injecting into the RCS with RCS temperature ≥ 175°F and the RCS is not vented, immediate action must be taken to render one SI pump incapable of injecting into the RCS. If one or more Safety injection (SI) pumps are capable of injecting into the RCS with RCS temperature < 175°F and the RCS is not vented, immediate action must be taken to render all SI pump incapable of injecting into the RCS. If an accumulator isolation valve is not closed and deenergized when required the valve is required to be closed and deenergized in one (1) hour. If the accumulator cannot be isolated within one hour, the RCS is required to be heated up to > 350°F within 12 hours or the accumulator is required to be depressurized within 12 hours. Surveillance Requirements are added to verify a maximum of one (1) SI pump capable of injecting into the RCS when required every 12 hours, verify no SI pumps capable of injecting into the RCS when required every 12 hours, and verify each accumulator isolation valve is closed and deenergized every 12 hours.	If LCO 3.4.12 Required Actions A.1, B.1, C.1, D.1, and D.2 SR 3.4.12.1 SR 3.4.12.2 SR 3.4.12.3	3.1.2.1
3.4 M37	The necessary RCS vent size to the containment to assure overpressure protection for the RCS was specified to be at least 4.4 square inches. No specific vent size value was specified previously.	LCO 3.4.12	3.1.2.1
3.4 M26	An allowance to not render all but one SI pump incapable of injecting into the RCS when the RCS is vented to containment atmosphere is deleted.	LCO 3.4.12	3.1.2.1
LCO 3.4.13, "RCS Operational Leakage"			

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.4 M27	The time allowed to reduce RCS leakage (other than pressure boundary leakage) to restore leakage to within limits was reduced to 4 hours from 12 hour as was previously allowed. The time allowed to reach MODE 3 if leakage requirements cannot be met was reduced to 6 hours from 12 hours as was previously allowed. The time allowed to reach MODE 5 if leakage requirements cannot be met was reduced to 36 hours from 42 hours as was previously allowed.	LCO 3.4.13 Required Actions A.1, B.1, and B.2	3.1.5.1 3.1.5.2
3.4 M28	A requirement was added which permits no RCS pressure boundary leakage.	LCO 3.4.13	3.1.5
LCO 3.4.14, "RC Pressure Isolation Valves (PIVs)"			
3.4 M29	A requirement in a NOTE was added that restricted separate condition entry to a PIV flow path rather than to a PIV. A requirement was added to isolate the affected penetration associated with an inoperable RHR System interlock within 4 hours. A Surveillance Requirement was added to verify that the RHR System interlock prevents the valves from opening on a simulated or actual pressure signal every 18 months.	LCO 3.4.14 Required Action B.1 SR 3.4.14.2	3.1.5.4
3.4 M30	The surveillance requirement to verify PIV leakage was required to be performed within 24 hours following valve actuation or flow through the valve. No previous requirement existed for the condition when a PIV actuated or flow occurred through a PIV.	SR 3.4.14.1	Table 4.1-3, Item 17
LCO 3.4.15, "RCS Leakage Detection Instrumentation"			

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.4, "REACTOR COOLANT SYSTEM"

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.4 M31, and 3.4 M32	Requirements were added for RCS Leakage Detection Instrumentation as follows. Only a surveillance requirement for RCS Leakage Detection Instrumentation existed previously. A requirement was added that one containment sump level monitor, one containment atmosphere radioactivity monitor (gaseous or particulate), and one containment fan cooler condensate flow rate monitor be operable. Requirements were added to perform an RCS water inventory balance every 24 hours and restore an inoperable containment sump level monitor to operable status within 30 days if the sump level monitor is inoperable. Requirements were added to analyze grab samples of the containment atmosphere every 24 hours, perform an RCS water inventory balance every 24 hours, restore required containment atmosphere radioactivity monitor to operable status within 30 days and verify that the containment fan cooler condensate flow rate monitor is operable every 30 days if the containment atmosphere radioactivity monitor is inoperable. If the containment fan cooler condensate flow rate monitor is inoperable, requirements were added to perform a channel check of the containment atmosphere radioactivity monitor every 8 hours, and perform an RCS water inventory balance every 24 hours. If both the containment atmosphere radioactivity monitor and the containment fan cooler condensate flow rate monitor are inoperable, requirements are added to	LCO 3.4.15, Required Actions A.1, A.2, B.1.1, B.1.2, B.2.1, B.2.2, C.1, C.2, D.1, D.2, E.1, E.2, and F.1 SR 3.4.15.1 SR 3.4.15.2 SR 3.4.15.4 SR 3.4.15.5	5.4.3

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.4 M31, and 3.4 M32 (Continued)	restore each monitor to operable status within 30 days. If these actions cannot be met, requirements are added to be in MODE 3 in 6 hours and MODE 5 in 36 hours. If all required monitors are inoperable, a requirement is added to enter LCO 3.0.3. Surveillance Requirements were added to perform a channel check every 12 hours on the containment atmosphere radioactivity monitor, perform a channel operational test on the containment atmosphere radioactivity monitor every 92 days, and perform a channel calibration on the containment atmosphere radioactivity monitor and containment fan cooler condensate flow rate monitor every 18 months.		
LCO 3.4.15, "RCS Leakage Detection Instrumentation"			
3.4 M34	The allowed frequency requirements for sampling RCS specific activity when the specific activity limits are exceeded was limited to once per 4 hours, rather than the frequency specified in the surveillance requirement, as was previously allowed.	LCO 3.4.16 Required Action A.1	3.1.4
LCO 3.4.17, "Chemical and Volume Control System (CVCS)"			
3.4 M40	A surveillance requirement was added to verify seal injection flow ≥ 6 gpm every 12 hours.	SR 3.4.17.1	3.2.5
3.4 M41	The time allowed to reach MODE 3 when requirements for the CVCS cannot be met was limited to 6 hours. No time limit was previously specified.	LCO 3.4.17 Required Action C.1	3.2.3
3.4 M42	Surveillance requirements were added to verify seal injection flow of ≥ 6 gpm from each makeup water pathway from the RWST every 18 months and to verify 300,000 gallons of water in the RWST every 7 days.	SR 3.4.17.2 SR 3.4.17.3	3.2.5

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.4, "REACTOR COOLANT SYSTEM"

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.4 M43	A requirement that the RCP seal injection be operable was added.	LCO 3.4.17	3.2.2
3.4 ~~M44~~ L20	Requirements were added as follows. When seal injection to any RCP is not within limits or both required charging pumps are inoperable, action is required immediately to restore seal injection to the RCP and the unit is required to be placed in MODE 3 in 6 hours and to cool down and depressurize the RCS to < 1400 psig within 12 hours. When seal injection to any RCP is not within limits or at least one charging pump is inoperable, action is required immediately to restore seal injection to the RCP and the unit is required to be placed in MODE 3 in 6 hours and in MODE 5 in 36 hours. If both makeup water pathways from the RWST are inoperable, the unit is required to be placed in MODE 3 in 6 hours and in MODE 5 in 36 hours.	LCO 3.4.17 Required Actions D.1, D.2, D.3, E.1, E.2, E.3, F.1, and F.2.	3.2.3
3.4 M45	The time allowed to reach MODE 5 when the requirements for CVCS cannot be met were restricted to 36 hours. No time limit existed previously.	LCO 3.4.17 Required Action C.2	3.2.5
3.4 M46	An allowance to extend the allowed times for CVCS for extended maintenance purposes beyond the times required in the specifications was deleted.	LCO 3.4.17	3.2.4

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.5, "EMERGENCY CORE COOLING SYSTEMS (ECCS)"

Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.5.1, "Accumulators"			
3.5 M1	Requirements for the accumulator were extended to apply to MODES 2 and 3 with pressurizer pressure greater than 1000 psig rather than to reactor critical as previously required.	LCO 3.5.1 Applicability	3.3.1.1
3.5 M2	A requirement to verify the position of the accumulator isolation valves once prior to removing power from the valves was added to the surveillance requirements for the accumulator isolation valves. A frequency of 31 days was imposed on the surveillance requirement to verify power is removed from the accumulator isolation valves. No surveillance frequency previously existed.	SR 3.5.1.1 SR 3.5.1.5	3.3.1.1
3.5 M3	A frequency of 12 hours was imposed on the surveillance requirements to verify minimum accumulator pressure and contained borated water. No surveillance frequency previously existed.	SR 3.5.1.2 SR 3.5.1 3	3.3.1.1
3.5 M4	The time to reach MODE 3 was limited to 6 hours in the required action for the accumulators specification. Completion times for these actions did not previously exist.	LCO 3.5.1 Required Action D.1	3.3.1.2
3.5 M5	The time to reach MODE 4 with pressurizer pressure ≤ 1000 psig was limited to 12 hours in the required action for the accumulators specification. Completion times for these actions did not previously exist.	LCO 3.5.1 Required Action D.2	3.3.1.2
3.5 M7	A requirement was added to enter LCO 3.0.3 immediately in the event that two or more accumulators are inoperable. The allowed time to reach MODE 3 in this condition was therefore limited to seven (7) hours rather than eight (8) hours as was previously required.	LCO 3.5.1 Required Action E.1	3.3.1.2

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.5 M8	A requirement was added to verify accumulator boron concentration within limits once within six (6) hours after each solution volume increase of ≥ 70 gallons that is not the result of addition from the RWST.	SR 3.5.1.4	Table 4.1-2 Item 6
3.5 M9	Requirements were added to verify that the accumulator boron concentration is ≥ 1950 ppm and ≤ 2400 ppm when performing the surveillance requirement for the accumulators. No maximum requirement existed previously.	SR 3.5.1.4	Table 4.1-2 Item 6
3.5 M10	The maximum allowed time between performance of the surveillance requirement for verifying accumulator boron concentration is within limits was limited to 39 days rather than 45 days.	SR 3.5.1.4	Table 4.1-2 Item 6
LCO 3.5.2, "ECCS-Operating"			
3.5 M11	A surveillance requirement was added to verify by visual inspection the ECCS train containment sump suction inlet is not restricted by debris and the suction inlet trash racks and screens show no evidence of structural distress or abnormal corrosion every 18 months.	SR 3.5.2.6	3.3.1.1
3.5 M12	A surveillance requirement was added to verify that manual valve RHR-764 is locked in the open position every 92 days.	SR 3.5.2.8	3.3.1.1
3.5 M22	The requirements for removing control power and air from certain ECCS valves were extended to apply to MODES 1, 2, and 3, rather than to plant conditions with RCS pressure greater than 1000 psig as was previously required.	SR 3.5.2.1 SR 3.5.2.7	3.3.1.1

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.5, "EMERGENCY CORE COOLING SYSTEMS (ECCS)"

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.5 M13	The allowed time between surveillance requirements were limited to 18 months rather than refueling interval. The length of time between refueling intervals was not specified in the previous requirements.	SR 3.5.2.4 SR 3.5.2.5	4.5.1.1
3.5 M14	A surveillance requirement was changed to require that the appropriate ECCS pump starts. rather than the appropriate ECCS pump breaker closes.	SR 3.5.2.5	4.5.1.2
3.5 M15	A requirement was added to verify two additional high head SI valves in the open position with the control power to the operators removed every 12 hours.	SR 3.5.2.1	4.5.2.1
LCO 3.5.3, "ECCS-Shutdown"			
3.5 M11	A surveillance requirement to meet surveillance requirements SR 3.5.2.3 and SR 3.5.2.6 was added to the specifications for ECCS during shutdown.	SR 3.5.3.1 SR 3.5.2.6	3.3.1.1
3.5 M17	Requirements were added to restore required high head injection subsystem to operable status within one (1) hour when the required high head injection subsystem is inoperable, and if not restored within the time limit, to be in MODE 5 in 24 hours. The effect of this change is to restrict the time to reach MODE 5 to five hours less than previously allowed.	LCO 3.5.3 Required Actions B.1 and C.1	3.3.1.2
3.5 M16	A Surveillance Requirement to verify specified valves are in the correct position was extended to apply to MODE 4.	SR 3.5.3.1	4.5.2.2

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.5, "EMERGENCY CORE COOLING SYSTEMS (ECCS)"

Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.5.4, "Refueling Water Storage Tank"			
3.5 M18	Requirements were added to restore an inoperable RWST to operable status within one (1) hour. The time to reach MODE 3 was limited to 6 hours and the time to reach MODE 5 was limited to 36 hours when the RWST cannot be restored within one (1) hour. The effect of this change is to restrict the time to meet applicable MODES to one less hour than previously allowed.	LCO 3.5.4 Required Actions B.1, C.1, and C.2	3.3.1.1
3.5 M19	A surveillance requirement was added to verify the RWST borated water temperature is $\geq$ 45°F and $\leq$ 100°F every 24 hours.	SR 3.5.4.1	3.3.1.1
3.5 M20	The allowed time between surveillance requirements for the RWST boron concentration was restricted to 7 days rather than 10 days as was previously required. Previously there was no requirement on maximum boron concentration.	SR 3.5.4.3	Table 4.1-2 item 3
3.5 M21	Requirements were added to the surveillance requirement to verify that boron concentration is within $\geq$ 1950 ppm and $\leq$ 2400 ppm in the RWST.	SR 3.5.4.3	Table 4.1-2 Item 3
3.5 M23	An allowance to permit any SI flow path to be isolated for Pressure Isolation Valve testing was restricted to apply to only to isolation of a cold leg safety injection flow path as opposed to any one SI or RHR flow path as previously allowed.	LCO 3.5.2 Applicability	3.3.1.1.e

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.6, "CONTAINMENT SYSTEMS,"

Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.6.1, "Containment"			
3.6 M1	Requirements were added to restore an inoperable containment to operable status within one (1) hour. The time to reach MODE 3 was limited to 6 hours and the time to reach MODE 5 was limited to 36 hours when the containment cannot be restored within one (1) hour. The effect of this change is to restrict the time to meet applicable MODES to one less hour than previously allowed.	LCO 3.6.1 Required Actions A.1, B.1, and B.2	3.6.1
LCO 3.6.2, "Containment Air Lock"			
3.6 M2	Requirements were added for when one containment air lock door is inoperable to verify the operable door is closed within one (1) hour, lock the operable door closed within 24 hours and verify the operable door is locked closed once per 31 days.	LCO 3.6.2 Required Actions A.1, A.2, and A.3	3.6.1
3.6 M3	Requirements were added for when one containment air lock mechanism is inoperable to verify an operable door is closed within one (1) hour, lock an operable door closed within 24 hours and verify an operable door is locked closed once per 31 days. A surveillance requirement was added to verify that only one containment air lock door can be opened at a time every 24 months.	LCO 3.6.2 Required Actions B.1, B.2, and B.3	3.6.1
3.6 M6	Requirements were added for when the containment air lock is inoperable for reasons other than an inoperable door or lock mechanism to verify a door is closed in the air lock within one (1) hour and restore the air lock to operable status within 24 hours.	LCO 3.6.2 Required Actions C.2 and C.3	3.6.1
3.6 M5	When requirements for the containment air lock cannot be met, the time to reach MODE 3 was limited to 6 hours and the time to reach MODE 5 was limited to 36 hours, rather than 8 hours and 38 hours, respectively, as was previously required.	LCO 3.6.2 Required Actions D.1 and D.2	3.6.1

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.6, "CONTAINMENT SYSTEMS,"

Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.6.3, "Containment Isolation Valves"			
3.6 M6	A requirement was added to place the plant in MODE 3 within 6 hours in the event that the requirements for inoperable containment isolation valves cannot be met. No previous requirement to reach MODE 3 existed.	LCO 3.6.3 Required Action D.1	3.6.3
3.6 M7	Requirements for inoperable automatic containment isolation valves were extended to apply to manual valves.	LCO 3.6.3 Required Actions A.1, B.1, and C.1	3.6.3
3.6 M8	An allowance to use a check valve to isolate an inoperable penetration with only one isolation valve and a closed system was deleted.	LCO 3.6.3 Required Action C.1	3.6.3
3.6 M9	The allowed outage time for two inoperable containment isolation valves was reduced to one (1) hour from four (4) hours.	LCO 3.6.3 Required Action B.1	3.6.3
3.6 M10	Requirements were added to verify the affected containment penetration flow path is isolated every 31 days when an inoperable containment penetration has been isolated in accordance with requirements.	LCO 3.6.3 Required Actions A.2 and C.2	3.6.3
3.6 M32	The time to reach MODE 3 was limited to 6 hours and the time to reach MODE 5 was limited to 36 hours when both the 6" and 42" purge valves are discovered open, rather than 8 hours and 38 hours, respectively, as was previously required.	LCO 3.6.3 Condition D	3.6.4
3.6 M11	The allowed time between surveillances for the containment isolation valves were limited to 18 months rather than refueling interval. The length of time between refueling intervals was not specified in the previous requirements.	SR 3.6.3.5	Table 4.1-3 Item 5

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.6, "CONTAINMENT SYSTEMS,"

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.6 M12	Requirements were added to the surveillance of the containment isolation valves to verify each automatic containment isolation valve that is not locked, sealed or otherwise secured in position actuates to the isolation position on an actual or simulated actuation signal.	SR 3.6.3.5	Table 4.1-3 Item 5
3.6 M13	Surveillance requirements were added to verify the position of containment isolation valves located outside containment every 31 days, verify the position of containment isolation valves inside containment prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days, and verify each 42 inch inboard containment purge valve is blocked to restrict the valve from opening > 70°.	SR 3.6.3.2 SR 3.6.3.6 SR 3.6.3.6	4.4.2
LCO 3.6.4, "Containment Pressure"			
3.6 M14	The allowed time to restore containment pressure to within the required limits was limited to one (1) hour, rather than eight (8) hours as was previously required.	LCO 3.6.4 Required Action A.1	3.6.2
3.6 M15	The allowed time to reach MODE 3 in the event that requirements for containment pressure cannot be met was limited to six (6) hours where no time requirement previously existed. A requirement was added to reach MODE 5 in 36 hours in the event that the requirements for containment pressure cannot be met.	LCO 3.6.4 Required Actions B.1 and B.2	3.6.2
3.6 M16	Requirements for containment pressure were extended to apply to MODES 1, 2, 3, and 4, rather than to power operations and reactor critical as was previously required.	LCO 3.6.4 Applicability	3.6.2
3.6 M17	A surveillance requirement was added to verify that containment pressure is within limits every 12 hours.	SR 3.6.4.1	3.6.2
LCO 3.6.5, "Containment Air Temperature"			

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.6 M18	Requirements were added for containment air temperature. No requirements previously existed.	LCO 3.6.5	3.6
LCO 3.6.6, "Containment Spray and Cooling Systems"			
3.6 M19	A requirement was added to enter LCO 3.0.3 immediately in the event that two containment spray trains or any combination of three or more trains are inoperable. The allowed time to reach MODE 3 in this condition was therefore limited to seven (7) hours rather than eight (8) hours as was previously required.	LCO 3.6.6 Required Action F.1	3.6.2.2
3.6 M20	Surveillance requirements were added to operate each containment cooling fan unit for ≥ 15 minutes every 31 days, verify cooling water flow rate to each cooling unit is 750 gpm every 31 days, and verify each containment cooling train starts automatically on an actual or simulated actuation signal every 18 months.	SR 3.6.6.2 SR 3.6.6.3 SR 3.6.6.7	4.5.1.6
3.6 M30	Requirements were added to the surveillance requirements to verify each containment spray pump starts automatically and to verify each automatic containment spray valve in the flow path that is not locked, sealed, or otherwise secured in position actuates to the correct position on an actual or simulated signal.	SR 3.6.6.5 SR 3.6.6.6	4.5.1.3
3.6 M31	The allowed time between surveillances for the containment spray system was limited to 18 months rather than refueling interval. The length of time between refueling intervals was not specified in the previous requirements.	SR 3.6.6.5 SR 3.6.6.6	4.5.1.3
3.6 M34	A requirement that allowed surveillance tests to be satisfied on the basis of visual observation that components have operated satisfactorily has been deleted.	SR 3.6.6.5 SR 3.6.6.6	4.5.1.5

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.6 M33	The surveillance requirements to verify valves int he containment spray system flow paths are in the correct position were extended to apply to MODES 1, 2, 3, and 4, rather than to power operations as was previously required	SR 3.6.6.1	4.5.2.2
LCO 3.6.7, "Spray Additive System"			
3.6 M21	Surveillance requirements were added to verify that the spray additive tank solution volume is ≥ 2505 gallons every 184 days and to verify the spray additive tank NaOH solution concentration is ≥ 30% every 184 days.	SR 3.6.7.2 SR 3.6.7.3	3.6.2.1
3.6 M34	A requirement that allowed surveillance tests to be satisfied on the basis of visual observation that components have operated satisfactorily has been deleted. A requirement was added to the surveillance requirement for the spray additive system to verify each automatic valve in the flow path that is not locked, sealed, or otherwise secured in position actuates to the correct position on an actual or simulated signal.	SR 3.6.7.4	4.5.1.3 4.5.1.5
3.6 M33	The surveillance requirements to verify valves in the containment spray additive system flow paths are in the correct position were extended to apply to MODES 1, 2, 3, and 4, rather than to power operations as was previously required.	SR 3.6.7.1	4.5.2.2
LCO 3.6.8, "Isolation Valve Seal Water System"			
3.6 M24	The requirements for the Isolation Valve Seal Water System (IVSW) were extended to apply to MODES 1, 2, 3, and 4, rather than to power operations as was previously required.	LCO 3.6.8	3.6.6.1

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.6, "CONTAINMENT SYSTEMS,"

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.6 M25	The allowed time to reach MODE 5 if the requirements of an inoperable IVSW System cannot be met was limited to 36 hours. No time limit previously existed.	LCO 3.6.8 Required Action B.2	3.6.6.2
3.6 M26	A requirement was added to the surveillance requirement for the IVSW system to verify each automatic valve actuates to the correct position on an actual or simulated actuation signal.	SR 3.6.8.4	Table 4.1-3 Item 15
3.6 M29	The allowed time between surveillances for the IVSW system was limited to 18 months rather than refueling interval. The length of time between refueling intervals was not specified in the previous requirements.	SR 3.6.8.4 SR 3.6.8.6	Table 4.1-3 Item 15
3.6 M23	Requirements were added to the surveillance requirement for the IVSW System to verify specific header flow rates which demonstrate the system's capability for sealing containment isolation valves.	SR 3.6.8.6	4.4.2
3.6 M27	Surveillance requirements were added to verify the IVSW tank pressure is ≥ 44 psig every 12 hours, verify the IVSW tank volume is ≥ 85 gallons every 31 days, and verify the IVSW dedicated nitrogen bottles will pressurize the IVSW tank to ≥ 44 psig every 18 months.	SR 3.6.8.1 SR 3.6.8.2 SR 3.6.8.5	4.4.2

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.7, "PLANT SYSTEMS,"

Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.7.1, "Main Steam Safety Valves," and LCO 3.7.2, "Main Steam Isolation Valves"			
3.7 M1	The Required Actions for Main Steam Safety Valves (MSSVs) and Main Steam Isolation Valves (MSIVs) were made to be applicable to MODES 2 and 3 for the MSSVs, and MODES 2 and 3 with the MSIVs open for the MSIVs, rather than only to MODE 1 as is currently required.	LCO 3.7.1 Applicability LCO 3.7.2 Applicability	3.4.3
3.7 M2	The time to reach MODE 3 was limited to 6 hours and the time to reach MODE 4 was limited to 12 hours in actions for the MSSV Specification. Completion times for these actions did not previously exist.	LCO 3.7.1 Required Actions C.1 and C.2	3.4.3
3.7 M3	The 24 hour time allowed for more than two (2) inoperable MSSVs was eliminated from current requirements.	LCO 3.7.1 Required Actions C.1 and C.2	3.4.3
3.7 M4	The time to reach MODE 2 was limited to 6 hours in the action for the MSIV Specification. A completion time did not previously exist. A new action to close an inoperable MSIV within 8 hours with the plant in MODE 3 and verify the MSIV closed once per 7 days was added where no requirements previously existed. A new action to place the plant in MODE 3 within 6 hours and MODE 4 within 12 hours if the inoperable MSIV cannot be closed was added where no requirements previously existed.	LCO 3.7.2 Required Actions B.1, C.1, C.2, D.1 and D.2	3.4.3

Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.7.3 "Main Feedwater Isolation Valves (MFIVs), Main Feedwater Regulation Valves (MFRVs), and Bypass Valves"			
3.7 M5	A new specification for Main Feedwater Isolation, Regulation, and Bypass Valves to be operable was added. No requirements for these valves previously existed.	LCO 3.7.3	3.4
LCO 3.7.4, "Auxiliary Feedwater System"			
3.7 M6	The requirements for a single Auxiliary Feedwater (AFW) System pump and flow path were extended to apply to when the Steam Generators are being used for heat removal.	LCO 3.7.4 Applicability	3.4.1
3.7 M7	The total time that the requirements for the AFW System cannot be met for any and all reasons was limited to 8 days before all requirements for the AFW system must be met. An overall completion time for failure to meet the AFW System requirements did not previously exist.	LCO 3.7.4 Required Actions A.1 and B.1	3.4.5
3.7 M8	A requirement to reach MODE 4 within 18 hours was added for the condition when the plant is required to shut down due to inoperable AFW components. No requirement to reach MODE 4 previously existed.	LCO 3.7.4 Required Action C.2	3.4.4
3.7 M9	A requirement to reach MODE 4 within 18 hours was added for the condition when the plant is required to shut down due to inoperable AFW components. No requirement to reach MODE 4 previously existed.	LCO 3.7.4 Required Action C.2	3.4.5

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.7 M10	A condition for three motor driven AFW flow paths was added. If the plant is in this condition, the plant must be shut down to MODE 4 conditions. A requirement to reach MODE 3 in 6 hours and MODE 4 in 18 hours was added for the condition when a steam driven AFW pump or flow path is inoperable in conjunction with a motor driven AFW pump or flow path. A requirement to restore a required inoperable AFW pump or flow path in MODE 4 immediately was added.	LCO 3.7.4 Required Actions D.1, D.2, F.1	3.4.4, 3.4.5
3.7 M11	Acceptance criteria were added to the requirements for testing the Auxiliary Feedwater Pumps. The acceptance criteria require that the measured pump performance be compared to and exceed the required pump performance.	SR 3.7.4.2	4.8.1, 4.8.2
3.7 M12	The testing requirement for AFW system pump discharge valves was extended to include all valves that actuate automatically which are not locked, sealed or otherwise secured in the required position	SR 3.7.4.3	4.8.3
3.7 M13	Surveillance requirements for the AFW system were added verifying that AFW valves are in the correct position every 31 days, verifying that the AFW pumps start automatically on an actual or simulated signal every 18 months, verifying that the AFW system is properly aligned to the Condensate Storage System after an extended plant shutdown, and verifying that the automatic bus transfer switch supplying power to one AFW valve operates automatically when required.	SR 3.7.4.1, SR 3.7.4.4, SR 3.7.4.5, SR 3.7.4.6	4.8
LCO 3.7.5, "Condensate Storage Tank (CST)"			
3.7 M14	The requirements for the Condensate Storage Tank requirements were extended to include MODE 4 when the Steam Generators are being used for heat removal.	LCO 3.7.5 Applicability	3.4.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.7 M15	The Required Actions for the Condensate Storage Tank (CST) were made to be applicable to MODES 2, 3, and 4 when the steam generators are used for heat removal, rather than only to MODE 1 as is currently required.	LCO 3.7.5 Applicability	3.4.3
3.7 M16	The time to reach MODE 3 was limited to 6 hours and the time to reach MODE 4 was limited to 18 hours in action for the CST Specification. Completion times for these actions did not previously exist.	LCO 3.7.5 Required Actions B.1 and B.2	3.4.3
3.7 M17	A requirement to verify by administrative means that the backup water supply to the AFW is operable within 4 hours and once per 12 hours thereafter was added for the condition when the CST water level is below the required limit. No requirement to verify the backup water supply previously existed. A requirement to reach MODE 3 within 6 hours and MODE 4 without reliance on the steam generators for heat removal was added for the condition when the Service Water System (SWS) supply to the AFW system is inoperable. No requirement for this condition previously existed. Surveillance requirements for the CST were added verifying that CST level is greater than the required limit every 12 hours and verifying by administrative means the operability of the backup SWS supply to the AFW system.	LCO 3.7.5 Required Actions A.1, C.1 and C.2 SR 3.7.5.1, SR 3.7.5.2	3.4

Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.7.6, "Component Cooling Water System," and LCO 3.7.7, Service Water System"			
3.7 M18	The time to reach MODE 3 was limited to 6 hours and the time to reach MODE 5 was limited to 36 hours for actions in both the Component Cooling Water (CCW) System and SWS Specifications. Completion times for these actions did not previously exist.	LCO 3.7.6 Required Actions B.1 and B.2, LCO 3.7.7 Required Actions D.1 and D.2	3.3.3.2 3.3.4.2
3.7 M19	The requirement to enter the Residual Heat Removal (RHR) System requirements, which is a system supported by the CCW System, when one required train of CCW is inoperable was added. Surveillance requirements for the CCW System were added verifying that CCW valves are in the correct position every 31 days and verifying that the CCW pumps start automatically on an actual or simulated signal every 18 months,	LCO 3.7.6 Required Action A note, SR 3.7.6.1, SR 3.7.6.2	3.3.3.2
3.7 M20	The time to reach MODE 5 was limited to 36 hours for actions in both the Component Cooling Water (CCW) System and SWS Specifications. Completion times for these actions did not previously exist.	LCO 3.7.6 Required Actions B.1, LCO 3.7.7 Required Action D.2	3.3.3.3, 3.3.4.3
3.7 M21	The requirement to enter the AC electrical power sources requirements, which is a system supported by the SWS, when one required train of SWS is inoperable was added. A requirement to close and deactivate an inoperable Turbine Building loop isolation valve within 72 hours and to verify the valve is closed every 31 days was added. A requirement to close and deactivate one of two inoperable Turbine Building loop isolation valves in 2 hours was added.	LCO 3.7.7 Required Action A Note, Required Actions B.1, B.2, and C.1	3.3.4.2

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.7, "PLANT SYSTEMS,"

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.7 M22	Surveillance requirements for the SWS were added verifying that valves in the SWS are in the correct position every 31 days and verifying that automatic valves in the flow path actuate to the correct position on an actual or simulated signal every 18 months.	SR 3.7.7.1 SR 3.7.7.2	3.3.4
3.7 M23	A surveillance requirement for the SWS was added verifying that the automatic bus transfer switch supplying power to one Turbine Building loop isolation valve operates automatically when required.	SR 3.7.7.4	3.3.4
LCO 3.7.8, "Ultimate Heat Sink (UHS)"			
3.7 M24	The requirements for the Ultimate Heat Sink were extended to include MODE 4 conditions.	LCO 3.7.8 Applicability	3.4.1
3.7 M25	The requirements for taking actions associated with inoperable components of the Ultimate Heat Sink were extended to include MODE 4 conditions.	LCO 3.7.8 Applicability	3.4.3
3.7 M26	The time to reach MODE 3 was limited to 6 hours and the time to reach MODE 5 was limited to 36 hours in the Ultimate Heat Sink Required Actions. Completion times for these actions did not previously exist.	LCO 3.7.8 Required Actions B.1 and B.2	3.4.3
3.7 M27	Surveillance Requirements for the Ultimate Heat Sink were added verifying that the lake water level meets requirements every 24 hours and verifying that the SWS temperature is less than or equal to 95°F every 24 hours.	SR 3.7.8.1, SR 3.7.8.2	3.4

Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.7.9, "Control Room Emergency Filtration System (CREFS)," and LCO 3.7.10, "Control Room Emergency Air temperature Control (CREATC)"			
3.7 M28	The time to reach MODE 3 was changed from eight (8) hours to six (6) hours for an inoperable Control Room Emergency Filtration System (CREFS) or Control Room Emergency Air Temperature Control (CREATC) System train that cannot be restored to operable status within the allowed time.	LCO 3.7.9 Required Action B.1 LCO 3.7.10 Required Action B.1	3.15.1.a
3.7 M29	The time to reach MODE 3 was changed from eight (8) hours to six (6) hours for two inoperable CREFS or CREATC System trains of which one cannot be restored to operable status within the allowed time.	LCO 3.7.9 Required Actions F.1 and F.2 LCO 3.7.10 Required Actions F.1 and F.2	3.15.1.b
3.7 M30	A requirement to suspend movement of irradiated fuel assemblies was added when both trains of CREFS and CREATC are inoperable during movement of irradiated fuel assemblies.	LCO 3.7.9 Required Action C.2 LCO 3.7.10 Required Action C.2	3.15.2.b
3.7 M31	The Surveillance Requirement for verification of Control Room positive pressure was made more restrictive by requiring a specific value be met for the air pressure relative to the outside atmosphere. The requirement is that the differential air pressure be at least one-eighth (1/8) inch water column.	SR 3.7.9.4	4.15.f.4
3.7 M32	A Surveillance Requirement for verification of Control Room Air Temperature Control cooling capacity was added.	SR 3.7.10.1	4.15.f.2

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.7, "PLANT SYSTEMS,"

Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.7.11, "Fuel Building Air Cleanup System"			
3.7 M33	Surveillance Requirements were added for the Fuel Building Air Cleanup System (FBACS) verifying that the FBACS be run for 10 continuous hours with the heaters operating automatically every 31 days, verifying that the FBACS be tested in accordance with the Ventilation Filter Testing Program, and verifying that the FBACS can maintain a negative pressure in the Fuel Building with respect to the outside atmosphere every 18 months.	SR 3.7.11.1 SR 3.7.11.2 SR 3.7.11.3	3.8.?
LCO 3.7.12 "Fuel Storage Pool water Level"			
3.7 M34	A new specification for Fuel Storage Pool Water Level was added which requires that a minimum of 21 feet of water be maintained above the fuel. No requirement for this value previously existed.	LCO 3.7.12	3.8
LCO 3.7.13 "Fuel Storage Pool Boron Concentration"			
3.7 M35	A requirement to suspend movement of fuel assemblies in the fuel storage pool was added when the fuel storage pool boron concentration is not within requirements during movement of fuel assemblies in the fuel storage pool.	LCO 3.7.13, Required Action A.1	5.4.3
3.7 M36	The frequency for sampling boron concentration in the fuel storage pool was increased from prior to refueling or fuel movement in the fuel storage pool to every seven (7) days.	SR 3.7.13.1	Table 4.1-2, Item 7

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.7, "PLANT SYSTEMS,"

Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.7.14 "New and Spent Fuel Assembly Storage"			
3.7 M37	A new specification for new and spent fuel storage pool storage was added which requires that new and spent fuel be stored in approved locations. Only a surveillance requirement previously existed.	LCO 3.7.4.14	5.4

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGE SECTION
3.8, "ELECTRICAL PLANT SYSTEMS,"

Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.8.1, "AC Sources-Operating"			
3.8 M1	The requirements for AC electrical power sources during operation were extended to apply to MODES 3 and 4, rather than only to reactor critical and power operations.	LCO 3.8.1 Applicability	3.7.1 3.7.2
3.8 M21	A requirement was added for the qualified circuit between the offsite transmission network and the onsite emergency AC electrical distribution system to be operable.	LCO 3.8.1	3.7.1
3.8 M2	Requirements that allowed power operation to continue beyond 24 hours provided one or both the diesel generators are operable and reporting requirements to the NRC are met were deleted.	LCO 3.8.1	3.7.2
3.8 M3	The time allowed for the requirements for AC sources during operation to not be met regardless of actions taken was limited to 8 days.	LCO 3.8.1 Required Actions A.2 and B.4	3.7.2
3.8 M4	The time to reach MODE 3 was limited to 6 hours and the time to reach MODE 5 was limited to 36 hours when requirements to restore an inoperable qualified offsite circuit or diesel generator cannot be met.	LCO 3.8.1 Required Actions C.1 and C.2	3.7.2
3.8 M25	A requirement for the diesel generators to achieve steady state voltage $\geq$ 467 volts and $\leq$ 493 volts and frequency of $\geq$ 58.8 Hz and $\leq$ 61.2 Hz was added to the monthly surveillance test of the diesel generator.	SR 3.8.1.2	4.6.1.1

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGE SECTION
3.8, "ELECTRICAL PLANT SYSTEMS,"

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.8 M5	Requirements to verify that the diesel generators energize permanently connected loads in ≤ 10 seconds, energizes auto-connected emergency loads through the load sequencer, achieves steady state voltage ≥ 467 volts and ≤ 493 volts and frequency of ≥ 58.8 Hz and ≤ 61.2 Hz, and supplies permanently connected and autoconnected emergency loads for ≥ 5 minutes, were added to the 18 month diesel generator surveillance test.	SR 3.8.1.14	4.6.1.2

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGE SECTION
3.8, "ELECTRICAL PLANT SYSTEMS,"

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.8 M6	Surveillance requirements were added as follows. Verify correct breaker alignment and indicated power availability for the offsite circuit every 7 days. verify each day tank contains ≥ 140 gallons of fuel oil every 31 days. Check for and remove accumulated water from each day tank every 31 days. Verify the fuel oil transfer system operates to automatically transfer from the storage tank to the day tank every 31 days. Verify each diesel generator starts from standby condition and achieves required voltage and frequency every 184 days. Verify each diesel generator rejects a load greater than or equal to its associated single largest load without tripping on overspeed every 18 months. Verify that each diesel starts on a simulated or actual loss of offsite power signal and achieves required conditions in the required times every 18 months. Verify that each diesel generator starts and achieves required conditions in the required times within five minutes of the 24 hour load test every 18 months. Verify that the interval between each sequenced load block is within ± 0.4 seconds of design interval every 18 months. Verify that each diesel starts on a simulated or actual Engineered Safety Features (ESF) signal and achieves required conditions in the required times every 18 months. Verify the automatic transfer capability of the 4.16 kV bus 2 and the 480 volt emergency bus 1 loads from the unit auxiliary transformer to the startup transformer every 18 months. Verify that when started simultaneously from standby condition each diesel achieves required conditions within 10 seconds every 10 years.	SR 3.8.1.1 SR 3.8.1.4 SR 3.8.1.5 SR 3.8.1.6 SR 3.8.1.7 SR 3.8.1.8 SR 3.8.1.9 SR 3.8.1.10 SR 3.8.1.13 SR 3.8.1.14 SR 3.8.1.15 SR 3.8.1.17	4.6.1
3.8 M19	A surveillance frequency requirement of 18 months was added to test the emergency diesel generators trips defeat function.	SR 3.8.1.11	4.6.1.3
3.8 M24	An allowance for exceeding minimum and maximum allowable kW values under the direct monitoring of the manufacturer was deleted.	SR 3.8.1.12	4.6.1.5

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGE SECTION
3.8, "ELECTRICAL PLANT SYSTEMS,"

Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.8.2, "AC Sources-Shutdown"			
3.8 M7	Requirements were added for AC electrical power sources in MODES 5 and 6, and during movement of irradiated fuel assemblies. No requirements existed previously in these modes.	LCO 3.8.2	3.7
LCO 3.8.3, "Diesel Fuel Oil and Starting Air"			
3.8 M1	The requirements for Diesel Fuel Oil and Starting Air were extended to apply to when the associated diesel generator is required to be operable, rather than only to reactor critical and power operations.	LCO 3.8.3 Applicability	3.7.1
3.8 M8	A requirement was added to restore the diesel generator air receiver pressure to ≥ 210 psig within 48 hours when pressure in one or more diesel generator air accumulators is less than 210 psig.	LCO 3.8.3 Required Actions D.1	3.7.1
3.8 M28	A requirement was added to restore stored fuel oil properties to within limits within 30 days of when one or more diesel generators with fuel oil properties are not within limits.	LCO 3.8.3 Required Action C.1	3.7.1
3.8 M9	Surveillance requirements were added to verify that each diesel generator air start receiver pressure is ≥ 210 psig and to check for and remove accumulated water from each fuel oil storage tank.	SR 3.8.3.3 SR 3.8.3.4	4.6.2
LCO 3.8.4, "DC Sources-Operating"			
3.8 M1	The requirements for DC electrical power sources were extended to apply to MODES 1, 2, 3, and 4, rather than only to reactor critical and power operations.	LCO 3.8.4 Applicability	3.7.1
3.8 M10	The time to reach MODE 3 was limited to 6 hours and the time to reach MODE 5 was limited to 36 hours when one inoperable DC electrical power source cannot be restored to operable status in two (2) hours.	LCO 3.8.4 Required Actions B.1 and B.2	3.7.2

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGE SECTION
3.8, "ELECTRICAL PLANT SYSTEMS,"

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.8 M11	Requirements to verify that the "A" Battery capacity is ≥ 80% and the "B" Battery capacity is ≥ 90% were added to the surveillance requirement to perform a performance discharge test.	SR 3.8.4.6	4.6.3
3.8 M13	Surveillance requirements were added to verify that battery cells, cell plates, and racks show no visual indication of physical damage or abnormal deterioration that could degrade battery performance every 18 months, remove visible terminal corrosion, verify battery cell to cell and terminal connections are clean and tight, and are coated with anti-corrosion material every 18 months, and verify each battery charger supplies ≥ 300 amps at 125 ≥ volts for ≥ 4 hours every 18 months.	SR 3.8.4.2 SR 3.8.4.3 SR 3.8.4.4	4.6
3.8 M12	A requirement to verify battery terminal voltage is ≥ 125.7 volts was added to the surveillance requirement performed on the battery chargers every 7 days.	SR 3.8.4.1	4.6.5

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGE SECTION
3.8, "ELECTRICAL PLANT SYSTEMS,"

Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.8.5, "DC Sources-Shutdown"			
3.8 M14	Requirements were added for AC electrical power sources in MODES 5 and 6, and during movement of irradiated fuel assemblies. No requirements existed previously in these modes.	LCO 3.8.5	3.7.1
LCO 3.8.6, "Battery Cell Parameters"			
3.8 M15	Requirements were added for battery cell parameters and average electrolyte temperature to be within specified limits when the associated DC electrical power subsystems are required to be operable. Surveillance requirements were added to verify that battery cell parameters be within Category B limits after a battery discharge or a battery overcharge and to verify average electrolyte temperature of representative cells is ≥ 67°F.	LCO 3.8.6 Applicability SR 3.8.6.2 SR 3.8.6.3	4.6.3
3.8 M26	A requirement was added to the battery surveillance requirement to verify that battery cell parameters be within Category A limits. Additionally the surveillance requirement was made to apply to all battery cells rather than to every fifth cell, and the allowed frequency of the surveillance was decreased from monthly to seven (7) days.	SR 3.8.6.1	4.6.3
3.8 M29	The surveillance requirement for measuring and recording the temperature of the battery electrolyte of the battery's pilot cell was extended to require measurement of the average of representative cells.	SR 3.8.6.3	4.6.3

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGE SECTION
3.8, "ELECTRICAL PLANT SYSTEMS,"

Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.8.7, "AC Instrument Bus Sources-Operating"			
3.8 M16	Requirements were added for AC Instrument Bus Sources during MODES 1, 2, 3, and 4. No requirements existed previously in these modes.	LCO 3.8.7	3.7
LCO 3.8.8, "AC Instrument Bus Sources-Shutdown"			
3.8 M17	Requirements were added for AC Instrument Bus Sources during MODES 5 and 6, and during movement of irradiated fuel assemblies. No requirements existed previously in these modes.	LCO 3.8.8	3.7
LCO 3.8.9, "Distribution Systems-Operating"			
3.8 M18	The requirements for AC distribution systems during operation were extended to apply to MODES 3 and 4, rather than only to reactor critical and power operations.	LCO 3.8.9 Applicability	3.7.1
3.8 M27	The requirement for the 480 volt emergency buses to be energized was extended to require also that all of Train A and Train B AC, DC, and AC instrument bus electrical power distribution subsystems be operable.	LCO 3.8.9	3.7.1
3.8 M20	The total time allowed for failure to meet the distribution systems specifications was limited to 16 hours. Requirements to be in MODE 3 in 6 hours and MODE 5 in 36 hours were added in the event that requirements to restore inoperable AC and DC electrical power distribution subsystems can not be met.	LCO 3.8.9 Required Actions B.1, C.1, F.1, and F.2	3.7.1
3.8 M22	Surveillance requirements were added to verify correct breaker alignments and voltage to AC, DC, and AC instrument bus electrical power distribution systems.	SR 3.8.9.1	Table 4.1-3, Item 18

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGE SECTION
3.8, "ELECTRICAL PLANT SYSTEMS,"

Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.8.10, "Distribution Systems-Shutdown"			
3.8 M23	Requirements were added for distribution systems during MODES 5 and 6, and during movement of irradiated fuel assemblies. No requirements existed previously in these modes.	LCO 3.8.10	3.7

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.9, "REACTIVITY CONTROL SYSTEMS"

Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.9.1, "Boron Concentration"			
3.9 M1	The requirements for maintaining boron concentration in the primary coolant during refueling operations were extended to apply to MODE 6 rather than to reactor vessel head removal and unloading fuel from the reactor.	LCO 3.9.1 Applicability	3.8.1
LCO 3.9.2, "Nuclear Instrumentation"			
3.9 M3	The requirements for nuclear instrumentation during refueling operations were extended to MODE 6 rather than to whenever core geometry is being changed.	LCO 3.9.2 Applicability	3.8.1
3.9 M13	A required action was added for the condition of one source range neutron monitor being inoperable to suspend positive reactivity additions. A requirement to cease refueling of the reactor in the event that the specifications for neutron instrumentation cannot be met was extended to apply to core alterations.	LCO 3.9.2 Required Actions A.1 and A.2	3.8.1
3.9 M4	A requirement was added when the specifications for neutron instrumentation cannot be met to perform a surveillance to verify boron concentration is within the limits of the Core Operating Limits Report (COLR) once within four (4) hours and every 12 hours thereafter.	LCO 3.9.2 Required Action B.2	3.8.1
3.9 M5	A surveillance requirement was added to perform a channel calibration every 18 months.	SR 3.9.2.2	3.8.1
LCO 3.9.3, "Containment Penetrations"			
3.9 M6	A surveillance requirement was added to verify each containment penetration is in the required status every 7 days.	SR 3.9.3.1	3.8.1

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.9, "REACTIVITY CONTROL SYSTEMS"

Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.9.4, "RHR and Coolant Circulation-High Water Level"			
3.9 M7	A requirement was added to the specifications for the Residual Heat removal (RHR) system for one RHR train to be in operation, and a note was added to allow the operating train to be removed from operation for one (1) hour in any eight (8) hour period.	LCO 3.9.4	3.8.1
3.9 M15	The requirements for RHR and coolant circulation were extended to apply to MODE 6 with water level at least 23 feet above the reactor vessel flange, rather than to whenever fuel assemblies are being moved within the reactor pressure vessel.	LCO 3.9.4 Applicability	3.8.1
3.9 M8	A requirement was added for the condition when the RHR and coolant circulation requirements cannot be met to close all penetrations with direct access to outside within four (4) hours.	LCO 3.9.4 Required Action A.4	3.8.1
3.9 M9	A surveillance requirement was added to verify that one RHR train is in operation every 12 hours.	SR 3.9.4.1	3.8.1
LCO 3.9.5, "RHR and Coolant Circulation-Low Water Level"			
3.9 M10	Requirements were added for RHR and coolant circulation with water level less than 23 feet above the top of the reactor vessel flange. No requirements previously existed.	LCO 3.9.5	3.8.1
LCO 3.9.6, "Refueling Cavity Water Level"			
3.9 M11	Requirements for refueling cavity water level were extended to apply to during movement for of irradiated fuel assemblies within containment rather than to whenever fuel assemblies are being moved within the reactor vessel.	LCO 3.9.6 Applicability	3.8.1

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 3.9, "REACTIVITY CONTROL SYSTEMS"

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.9 M16	Requirements for refueling cavity water level were extended to apply to core alterations from whenever fuel assemblies are being moved within the reactor vessel.	LCO 3.9.6 Applicability	3.8.1
LCO 3.9.7, "Containment Purge Filter System"			
3.9 M18	Surveillance requirements were added to verify that the containment purge filter system is in operation and maintaining containment pressure negative relative to the adjacent auxiliary building every 12 hours and to perform required containment purge filter system testing in accordance with the Ventilation Filter Testing Program.	SR 3.9.7.2 SR 3.9.7.3	3.8.1

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 4.0 "Design Features"

Discussion of Change	Summary of Change	ITS Section	CTS Section
4.0 "Design Features"			
4.0 M1	Requirements regarding fuel storage were expanded to include nominal center to center distance between fuel assemblies placed in the high density and low density fuel racks.	4.3.1.1.c 4.3.1.1.d	5.4
4.0 M2	Requirements regarding fuel storage were expanded to include provisions limiting inadvertent draining the spent fuel pool below 18 feet above the top of the fuel.	4.3.2	5.4
4.0 M3	Requirements regarding design of spent fuel storage racks and new fuel storage racks were expanded to include requiring allowances for uncertainties in calculation of reactivity.	4.3.1.2.b 4.3.1.2.c 4.3.1.1.b	5.4.2.1

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 5.0, "ADMINISTRATIVE CONTROLS"

Discussion of Change	Summary of Change	ITS Section	CTS Section
	Section 5.1, "Responsibility"		
5.0 M14	Requirements were added for the control room command function, and for succession for that function. No requirements previously existed.	5.1.2	6.1.1
	Section 5.2, "Organization"		
5.0 1	The requirements for two licensed operators to be present in the control room under certain conditions were extended to be at all times during MODES 1, 2, 3, and 4, and the requirement was added that one of the two operators be a Senior Reactor Operator.	Section 5.2.2	6.2.3
	Section 5.4, "Procedures"		
5.0 M2	A requirement was added to maintain written emergency operating procedures.	Section 5.4.1	6.5.1.1.1
5.0 M3	A requirement was added for written procedures to cover all programs specified in Specification 5.5.	Section 5.4.1	6.5.1.1.1
	Section 5.5, "Programs and Controls"		
5.0 M4	The level of approval for the Offsite Dose Calculation Manual (ODCM) was restricted from review and acceptance of the Plant Nuclear Safety Committee to approval by the Plant Manager.	Section 5.5.1	6.16.2
5.0 M12	Requirements were added for the content of the ODCM to include the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Radiological Environmental Operating and Radioactive Effluent Release Reports.	Section 5.5.1	6.16.2

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 5.0, "ADMINISTRATIVE CONTROLS"

Discussion of Change	Summary of Change	ITS Section	CTS Section
5.0 M5	A program for component cyclic or transient limits was added to track Updated Final Safety Analysis Report (UFSAR) transient occurrences.	Section 5.5.5	1.0
5.0 M11	A program was added that provides controls for the relocated requirements for control of radioactive effluents contained in the Current Technical Specifications Radiological Environmental Technical Specifications.	Section 5.5.4	1.0
5.0 M13	A program was added for primary coolant sources outside of containment that duplicates Facility Operating License DPR-23, paragraph 3.G(2).	Section 5.5.2	1.0
5.0 M9	Requirements for the Prestressed Concrete Containment Tendon Surveillance Program were added for controls for monitoring any tendon degradation and effectiveness in corrosion protection medium, frequencies, and acceptance criteria.	Section 5.5.6	4.4.4.1
5.0 M6	Requirements were added for the Technical Specification Bases Control Program.	Section 5.5.14	4.20
5.0 M7	Requirements were added for the Safety Function Determination Program (SFDP).	Section 5.5.15	4.20
5.0 M15	Requirements were added to perform surveillance tests in the Diesel Fuel Oil testing Program to sample for cloud point, sample every 31 days rather than prior to transfer to the Unit No. 2 storage tank, restrict the allowed extension of the surveillance interval to 38.75 days from 45 days, and determining that the fuel oil is acceptable for use prior to adding the oil to the storage tank.	Section 5.5.13	Table 4.1-2, Items 11 and 12
Section 5.6, "Reporting Requirements"			

TABLE M - MATRIX OF MORE RESTRICTIVE CHANGES
SECTION 5.0, "ADMINISTRATIVE CONTROLS"

Discussion of Change	Summary of Change	ITS Section	CTS Section
5.0 M10	A requirement was added that primary safety and relief valve challenges shall be included in the monthly Operating Report, rather than in an annual report as previously required.	Section 5.6.4	6.9.1.2.4
5.0 M8	A requirement was added to include the Emergency Core Cooling System (ECCS) limits in the Core Operating Limits Report (COLR).	Section 5.6.5	6.9.3.3

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 1.0 "Use and Application"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
1.0 "Use and Application"					
1.1 L1	The definition for CHANNEL CALIBRATION was relaxed to exclude RTDs and thermocouples, requiring an in place cross channel comparison.	1.1	1.6.2	None	Unique

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 2.0 "Safety Limits (SL)"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
2.0 "Safety Limits (SL)"					
2.0 L1	The requirements for Reactor Coolant System (RCS) Pressure Safety Limits (SL) were reduced to exclude the time when fuel is in the reactor vessel and the rector vessel head closure bolts are not fully tensioned or the reactor vessel head is removed.	2.1.2	2.2	I	Unique with respect to Applicability details

Categories

I. Relaxation of Applicability
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.0, "LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.0 L1	An exception to complying with required actions when a specification was not met was added to allow for testing of inoperable equipment in order to restore the inoperable equipment to operable status.	LCO 3.0.5	3.0	None	Unique
3.0 L2	An allowance for extending the frequency by 1.25 times after the first performance of a required action when a specification is not met was added. The frequency must be specified as "once per . . ."	SR 3.0.2	4.0	None	Unique

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.1, "REACTIVITY CONTROL SYSTEMS,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.1.1, "SHUTDOWN MARGIN (SDM)"					
3.1 L1	The allowed time to restore SDM to within the required limits was extended from no allowed time to 15 minutes.	LCO 3.1.1 Required Action A.1	3.10.8	VII	Unique with respect to allowed outage time extension only
LCO 3.1.2, "Core Reactivity"					
3.1 L7	A requirement was deleted to submit a Special Report to the NRC within 30 days of observance of a difference between predicted and actual boron concentration that is equivalent to one percent in reactivity.	LCO 3.1.2	4.9	VIII	Unique with respect to circumstances of report

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.1, "REACTIVITY CONTROL SYSTEMS,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.1.3, "Moderator Temperature Coefficient"					
3.1 L2	A requirement to make the reactor subcritical by an amount greater than or equal to the potential reactivity insertion from depressurization was relaxed to require that administrative control rod withdrawal limits to maintain Moderator Temperature Coefficient (MTC) within limit within 24 hours.	LCO 3.1.3 Required Action A.1	3.1.3.3	None	Unique

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.1, "REACTIVITY CONTROL SYSTEMS,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.1 L5	The time allowed for shutting down the reactor when the MTC lower limit is not met was extended from eight (8) hours to 12 hours.	LCO 3.1.6 Required Action C.1	3.1.3	None	Unique
3.1 L3	The surveillance requirement for verifying rod freedom of movement was relaxed to apply only to rods not fully inserted and to be performed only every 92 days rather than every 14 days as previously required.	SR 3.1.4.2	Table 4.1-3, Item 2	I, II	Unique with respect to frequency and surveillance applicability details only

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.1, "REACTIVITY CONTROL SYSTEMS,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.1.6, "Control Bank Insertion Limits"					
3.1 L4	The time allowed for restoring control banks to within insertion limits when control banks are not within limits was extended from one (1) hour to two (2) hours.	LCO 3.1.6 Required Action A.2	3.10.1.3	None	Unique
LCO 3.1.7, "Rod Position Indication"					
3.1 L6	Requirements were added for rod position indication which provide alternate actions for inoperable position indication to the requirements for rod insertion limits.	LCO 3.1.7	Table 4.1-1, Items 9 and 10	None	Unique

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.2, "POWER DISTRIBUTION LIMITS"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.2.1, "Heat Flux Hot Channel Factor"					
3.2 L1	The requirements for the heat flux hot channel factor were limited to apply only to MODE 1 rather than all times as previously applied.	LCO 3.2.1 Applicability	3.10.2	I	Unique with respect to applicability details only
3.2 L2	The allowed time to reduce the overpower and overtemperature ΔT setpoints when the heat flux hot channel factor limit cannot be met was extended from 24 hours to 72 hours.	LCO 3.2.1 Required Action A.2.3	3.10.2.1.1	VII	Unique with respect to allowed outage time extension only.

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.2, "POWER DISTRIBUTION LIMITS"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.2.2, "Nuclear Enthalpy Rise hot Channel Factor"					
3.2 L3	The requirements for the heat flux hot channel factor were limited to apply only to MODE 1 rather than all times as previously applied.	LCO 3.2.2 Applicability	3.10.2.1	I	Unique with respect to applicability details only
3.2 L4	The requirement to perform a surveillance to verify the nuclear enthalpy rise hot channel factor is within limits after exceeding by 10% the power level at which the heat flux hot channel factor was last determined was deleted.	LCO 3.2.2	3.10.2.1.1	II	Unique with respect to frequency details only

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.2, "POWER DISTRIBUTION LIMITS"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.2 L5	Requirements to reduce the overpower and overtemperature ΔT setpoints if the nuclear enthalpy rise hot channel factor is not met within 24 hours were deleted.	LCO 3.2.2	3.10.2.1.1	V	Unique with respect to required actions that are deleted
LCO 3.2.3, "Axial Flux Difference (AFD) (PDC-3 Axial offset Control Methodology)					
3.2 L6	A requirement was deleted to reduce the high neutron flux setpoints to below 55% when accumulated penalty deviation time exceeds one (1) hour.	LCO 3.2.3	3.10.2.7	V	Unique with respect to required actions that are deleted

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.2, "POWER DISTRIBUTION LIMITS"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.2 L7	An allowance was added to permit a total of 16 hours of operation to be accumulated with AFD outside of the target band without penalty deviation time during surveillance of the power range channels.	LCO 3.2.3 Applicability	3.2.3	None	Unique
3.2 L8	A requirement to log AFD every half hour after the first 24 hours that the AFD monitor is out of service was relaxed to once within one (1) hour and every one (1) hour when thermal power is < 90% of rated thermal power or 0.9 Allowable Power Level whichever is less.	SR 3.2.3.2	3.10.2.10	II	Unique with respect to frequency details

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.2, "POWER DISTRIBUTION LIMITS"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.2 L9	The requirement to perform a surveillance to determine the AFD target flux difference after exceeding by 10% the power level at which the heat flux hot channel factor was last determined was deleted.	LCO 3.2.3	3.10.2.1.1	II	Unique with respect to frequency details only

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.2, "POWER DISTRIBUTION LIMITS"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.2.4, "Quadrant Power Tilt Ratio"					
3.2 L10	Requirements for quadrant power tilt ratio (QPTR) were relaxed to apply only to MODE 1 with thermal power above 50% rated thermal power to not include power increases below 50% rated thermal power.	LCO 3.2.4 Applicability	3.10.3.1	I	Unique with respect to applicability details only
3.2 L11	A requirement was deleted to reduce the high neutron flux setpoints to two percent of rated values for every percent of indicated power tilt ratio exceeding 1.0 when QPTR exceeds 1.02.	LCO 3.2.4	3.10.3.1	V	Unique with respect to required actions that are deleted

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.2, "POWER DISTRIBUTION LIMITS"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.2 L12	Requirements were relaxed to permit continued operation above 50% rated thermal power with QPTR in excess of limits for greater than 24 hours. A requirement to reduce the high neutron flux setpoints to 55% rated thermal power if QPTR remains in excess of limits for greater than 24 hours was deleted.	LCO 3.2.4	3.10.3.1	V	Unique with respect to required actions that are deleted
3.2 L13	Requirements were deleted that were associated with the condition that QPTR is greater than 1.09 simultaneous with a misaligned rod.	LCO 3.2.4	3.10.3.2 3.10.3.3	V	Unique with respect to required actions that are deleted

Categories

I. Relaxation of Applicability
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.3.1, "Containment"					
3.3 L1	Allowable values have been specified for trip setpoints in accordance with the licensee setpoint methodology procedure. The allowable values for the overtemperature and overpressure ΔT setpoints are less restrictive.	LCO 3.3.1 Table 3.3.1-1, Functions 5 and 6	2.3.1.2	None	Unique
3.3 L2	An instrument tolerance of ± 10% was added to the time constants for the overtemperature and overpressure ΔT setpoints. Inequality signs were added for parameters in the overtemperature and overpressure ΔT setpoints.	Table 3.3.1-1, Functions 5 and 6	2.3.1.2	None	Unique

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L3	The allowed time to place a channel into tripped condition was extended from one (1) hour to six (6) hours in accordance with WCAP 10271-P-A.	LCO 3.3.1 Required Action E	Table 3.5-2 ACTION 6	VII	Allowed Outage Time Extension from 1 hour to 6 hours.

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L4	The allowed time to place a channel into tripped condition was extended from one (1) hour to six (6) hours in accordance with WCAP 10271-P-A. The shutdown requirement for when a channel cannot be placed in trip as required was relaxed to require only that reactor power be reduced to below the P-7 interlock within 12 hours, rather than to be in MODE 3 in 8 hours.	LCO 3.3.1 Required Actions M, N, P Function 11	Table 3.5-2 Item 14 ACTION 7	V, VII	Allowed Outage Time Extension from 1 hour to 6 hours, relaxation of shutdown requirement
3.3 L5	Mode applicability for certain reactor trip functions were relaxed to require the functions only above the P-7 interlock.	LCO 3.3.1 Table 3.3.1-1 Notes (h) and (f)	Table 3.5-2 Notes **** and *****	I	Unique with respect to applicability details only

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L6	The allowed time for an inoperable manual reactor trip function was extended from 12 hours to 48 hours and the time to be in MODE 3 extended from 20 hours to 54 hours.	LCO 3.3.1 Required Action B	Table 3.5-2 ACTION 1	VII	Allowed Outage Time Extension from 12 hours to 48 hours, allowed shutdown time Extension from 20 hours to 54 hours
3.3 L7	The requirement to monitor Quadrant Power Tilt Ratio (QPTR) every 12 hours with one excore channel inoperable is relaxed to require monitoring only when the channel input to QPTR is inoperable.	LCO 3.3.1 Required Action D.2.2	Table 3.5-2 ACTION 2	None	Unique

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L8	The allowed time to place a channel into tripped condition was extended from one (1) hour to six (6) hours in accordance with WCAP 10271-P-A. A requirement to reduce thermal power to ≤ 85% rated thermal power when one channel is inoperable was eliminated.	LCO 3.3.1 Required Action E	Table 3.5-2 ACTION 2	VII and elimination of requirement	Allowed Outage Time Extension from 1 hour to 6 hours, and unique with respect to elimination of requirement

Categories

- L. Relaxation of Applicability.
- I. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions to exit Applicability
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L9	The requirements for two inoperable intermediate range neutron flux channels were relaxed to require only that reactor power be reduced to below the P-6 interlock within two (2) hours and to suspend operations involving positive reactivity additions, rather than to be in MODE 3 in 8 hours.	LCO 3.3.1 Required Action G	3.10.5	None	Unique

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L10	The allowed time to place a channel into tripped condition was extended from one (1) hour to six (6) hours in accordance with WCAP 10271-P-A. The shutdown requirement for when a channel cannot be placed in trip as required was relaxed to require only that reactor power be reduced to below the P-7 interlock within 12 hours, rather than to be in MODE 3 in 8 hours.	LCO 3.3.1 Table 3.3.1-1 Functions 2a, 8, 9, 12	Table 3.5-2 Items 7, 9, 10, 13	V, VII	Allowed Outage Time Extension from 1 hour to 6 hours, relaxation of shutdown requirement

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L11	The allowed time to place a channel into tripped condition was extended from one (1) hour to six (6) hours in accordance with WCAP 10271-P-A. The shutdown requirement for when a channel cannot be placed in trip as required was relaxed to require only that reactor power be reduced to below the P-7 interlock within 10 hours, rather than to be in MODE 3 in 8 hours.	LCO 3.3.1 Table 3.3.1-1 Function 15	Table 3.5-2 Item 11	V, VII	Allowed Outage Time Extension from 1 hour to 6 hours, relaxation of shutdown requirement

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L12	The requirements for underfrequency and undervoltage trips have been relaxed to apply only to MODE 1, rather than reactor critical, as was previously required.	LCO 3.3.1 Table 3.3.1-1 Functions 11 and 12	Table 3.5-2 Items 13 and 14	I	Unique with respect to applicability details
3.3 L14	The frequency of surveillance requirements for the nuclear power range and reactor coolant temperature trip functions were relaxed from bi-weekly to 92 days in accordance with WCAP 10271-P-A.	LCO 3.3.1 Table 3.3.1-1 Functions 2a, 5, and 6 SR 3.3.1.7 SR 3.3.1.8	Table 4.1-1 Items 1, 4	II	[illegible] with respect to [illegible]liance frequency

Categories

I. Relaxation of Applicability
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L15	The frequency of surveillance requirements as it applies to reactor startup for the nuclear intermediate range and source range were relaxed from requiring the surveillance to be performed within 77 days prior to startup to within 92 days prior to startup in accordance with WCAP 10271-P-A.	LCO 3.3.1 Table 3.3.1-1 Functions 3 and 4 SR 3.3.1.7 SR 3.3.1.8	Table 4.1-1 Items 2, 3	II	Unique with respect to surveillance frequency

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Raport to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L16	The frequency of surveillance requirements for the reactor coolant flow, pressurizer pressure, Reactor Coolant Pump (RCP) voltage, steam generator level, steam/feedwater flow mismatch, and low steam generator level functions were relaxed from monthly to 92 days in accordance with WCAP 10271-P-A.	LCO 3.3.1 Table 3.3.1-1 Functions 9, 8, 7, 11, 13, and 14	Table 4.1-1 Items 5, 6, 7, 8, 11, 39, 40	II	Unique with respect to surveillance frequency
3.3 L17	The frequency of surveillance requirements for the turbine first stage pressure function was relaxed from monthly to 18 months.	LCO 3.3.1 Table 3.3.1-1 Function 17e	Table 4.1-1 Item 25	II	Unique with respect to surveillance frequency

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L	The frequency of surveillance requirements for actuation logic testing were relaxed from monthly to 31 days on a staggered test basis.	LCO 3.3.1 SR 3.3.1.5	Table 4.1-1 Item 27	II	Unique with respect to surveillance frequency, See LCO 3.3.2 L18, Bin with L19
3.3 L19	The frequency of surveillance requirements for reactor trip breaker testing were relaxed from monthly to 31 days on a staggered test basis.	LCO 3.3.1 SR 3.3.1.4	Table 4.1-1 Item 30	II	Unique with respect to surveillance frequency, Bin with L18
3.3 L20	The frequency of surveillance requirements for reactor trip bypass breaker testing were relaxed from monthly to 31 days on a staggered test basis.	LCO 3.3.1 SR 3.3.1.4	Table 4.1-1 Item 47	II	Unique with respect to surveillance frequency, Bin with L18

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L35	Applicability was reduced in MODES 3, 4 and 5 for manual reactor trip, source range neutron flux, reactor trip breakers, reactor trip breaker UV and shunt trip mechanism and automatic trip logic.	Table 3.3.3-1 Note a	Table 3.5-2 Note (*)	I	Unique with respect to reduced Applicability.
3.3 L36	Required Action was relaxed to permit exiting Applicability by increasing power to ≥ P-10 setpoint.	LCO 3.3.1 Required Action F	Table 3.5-2 ACTION 3	None	Unique with respect to reduction in Required Action.
3.3 L37	Completion Time was relaxed by adopting Required Action permitting 6 hours to restore channel where no restoration time was previously provided.	LCO 3.3.1 Required Action O	N/A	VII	Unique with respect to increased Completion Time.

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L38	Required Action was relaxed to permit two Neutron flux intermediate range channels inoperable when below the P-6 setpoint.	LCO 3.3.1 Required Action H	Table 3.5-2 ACTION 3	V VII	Unique with respect to Applicability.
3.3 L39	SR frequency was relaxed to eliminate monthly calibration for Nuclear Power range channels.	SR 3.3.1.11	Table 4.1-1 Item 1	II	Unique with respect to Frequency.
3.3 L40	SR frequencies were relaxed to permit delaying performance of certain SRs until a specified interval after achieving specified unit conditions.	SR 3.3.1.2 SR 3.3.1.3 SR 3.3.1.6 SR 3.3.1.7	Table 4.1-1 Items 1, 3, & 4	II	Unique with respect to Frequency.

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L41	Surveillance requirements are relaxed by excluding neutron detectors from calibration.	SR 3.3.1.11	Table 4.1-1 Items 1, 2, 3	None	Unique with respect to SR scope.

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.3.2, "ESFAS Instrumentation"					
3.3 L13	Requirements for automatic actuation logic and actuation relays for the Engineered Safety Features Actuation System were added, which include allowed outage times which were not previously permitted.	LCO 3.3.2 Table 3.3.2-1 Functions 1.b, 2.b, 3.a(2), 3.b(2), 4.b, and 5.a Required Actions C and G	Table 3.5-4	VII	Unique with respect to allowed outage time details
3.3 L18	The frequency of surveillance requirements for actuation logic testing were relaxed from monthly to 31 days on a staggered test basis.	LCO 3.3.2 SR 3.3.2.2	Table 4.1-1 Item 27	II	Unique with respect to surveillance frequency. See LCO 3.3.1 L18

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L21	The allowed time for an inoperable channel to remain in the tripped condition was relaxed from the surveillance frequency interval to continuous operation. The allowed time to place a channel into tripped condition was extended from one (1) hour to six (6) hours in accordance with WCAP 10271-P-A.	LCO 3.3.2 Required Actions C, D, E, and G	Table 3.5-3 ACTION 12	VII	Unique with respect to allowed outage time details
3.3 L42	Applicability for steam line isolation functions was reduced to exclude when MSIVs are closed.	LCO 3.3.2-1 Note e	Table 3.5-4 Functions 2A, 2B, 2C & 2D	I	Reduced applicability due to position of actuated equipment. Bin with L43, L46 and L49.

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L43	Applicability for feedwater isolation functions was reduced to exclude when MFIVs MFRVs and bypass valves are closed or isolated by a closed manual valve.	Table 3.3.2-1 Note f	3.0	I	Reduced applicability due to position of actuated equipment. Bin with L42, L46 and L49.

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L50	Requirements relaxed to permit all channels of a ESFAS Instrument function or a single ESFAS instrumentation train (except for manual Actuation functions) to be inoperable for maintenance or surveillance testing for up to 12 hours.	LCO 3.3.2 Required Actions Note 2	N/A	None	Unique with respect to Action relaxation.

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.3.3, "Post Accident Monitoring (PAM) Instrumentation"					
3.3 L22	The allowed time for an inoperable containment high range radiation monitoring channel was extended from 7 days to 30 days.	LCO 3.3.3 Table 3.3.3-1 Function 10	Table 3.5-5	VII	Unique with respect to allowed outage time
3.3 L23	The allowed time for an inoperable auxiliary feedwater (AFW) flow indicator channel was extended from 7 days to 30 days.	LCO 3.3.3 Table 3.3.3-1 Function 19	Table 3.5-5 Note 1	VII	Unique with respect to allowed outage times only, Bin with L22

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	iTS Section	CTS Section	Category	Characterization
3.3 L24	The requirements for both inoperable containment hydrogen monitoring channels were relaxed to require only that MODE 4 be reached within 6 hours, rather than MODE 5 within 36 hours as was previously required.	LCO 3.3.3 Required Action E	Table 3.5-5 Note 6	V	Unique with respect to required actions only
3.3 L25	The allowed time for an inoperable thermocouple channel was extended from 7 days to 30 days. If the channel cannot be restored as required, requirements were relaxed to require only a special report to the NRC, rather than to shut down the reactor.	LCO 3.3.3 Required Actions A and B	Table 3.5-5 Note 8	VII	Unique with respect to allowed outage time, unique with respect to removal of shutdown requirement

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L26	The allowed time for an inoperable thermocouple channel was extended from 48 hours to 7 days.	LCO 3.3.3 Table 3.3.3-1 Functions 15-18	Table 3.5-5 Note 8	VII	Unique with respect to allowed outage time details
3.3 L27	A refueling interval test requirement for pressurizer Power Operated Relief Valve (PORV) position indication, block valve position indication, and safety valve position indication was relaxed was eliminated.	LCO 3.3.3	Table 4.1-1 Items 35, 36, 37	None	Unique.

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L44	Requirements two PAM channels inoperable were relaxed to eliminate shutdown requirements when initiation of alternative monitoring is not established within 7 days.	LCO 3.3.3 Required Action H	Table 3.5-5 Note 5	VII	Unique with respect to Required Actions.
3.3 L49	Requirements for the steam line isolation - containment pressure-high-high function were relaxed to exclude MODE 3 when all MSIVs are closed and to exclude MODE 4.	Table 3.3.2-1 Function 4.c	Table 3.5-4 Item 2.c	I	Unique with respect to required actions. Bin with L42 L43 and L46.

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.3.4 "Remote Shutdown System"					
None					
LCO 3.3.5, "LOP DG Start Instrumentation"					
3.3 L28	Requirements for Diesel Generator (DG) start instrumentation were relaxed by allowing entry into the required actions for the DG made inoperable instead of requiring the unit to be shut down. AN allowed outage time of one (1) was permitted to restore one or more inoperable channels.	LCO 3.3.5 Required Actions A and D	Table 3.5-3 Functional Unit 3.a ACTION 14	V, VII	Reduction in Required Actions by entering Condition and Required Action for supported equipment. Bin with L29.

Categories

I. Relaxation of Applicability
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L29	The allowed outage time for an inoperable degraded voltage channel to be placed in trip was relaxed from one (1) hour to six (6) hours. Requirements were relaxed by allowing entry into the required actions for the DG made inoperable instead of requiring the unit to be shut down.	LCO 3.3.5 Required Actions B and D	Table 3.5-3 Functional Unit 3B ACTION 14	V, VII	Reduction in Required Actions by entering Condition and Required Action of supported equipment. Bin with L28.

Categories

I. Relaxation of Applicability
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L30	Requirements for an inoperable degraded voltage channel were relaxed by adoption of Note which permits bypassing the inoperable channel for up to four hours for testing of other channels.	LCO 3.3.5 Required Action B.1 Note	3.5.1	None	Unique
3.3 L45	Surveillance testing requirements were relaxed to permit excluding injection of the test signal into channel during the functional test.	SR 3.3.5.1	Table 4.1-1 Item 32	VI	Unique with respect to acceptance criteria. Bin with L48.

Categories

I. Relaxation of Applicability
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.3.6, "Containment Ventilation Isolation Instrumentation"					
3.3 L31	The surveillance frequency for testing the containment ventilation isolation instrumentation was relaxed by eliminating testing immediately prior to refueling.	LCO 3.3.6	3.8.1.b	II	Unique with respect to frequency.
3.3 L46	The requirements for an inoperable Containment Ventilation Isolation Phase A function were relaxed to permit continued operation with the purge and vent valves closed and maintained closed.	LCO 3.3.6 Required Action A	Table 3.5-4 Item 1.C.iii	V	Reduced applicability due to position of actuated equipment. Bin with L42, L43 and L49.
LCO 3.3.7, "CREFS Actuation Instrumentation"					
None					

Categories

I. Relaxation of Applicability
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.3.8, "AFW System Instrumentation"					
3.3 L32	Requirements for the Auxiliary Feedwater (AFW) instrumentation were relaxed by permitting placing channel in trip within six (6) hours instead of maintaining the unit in hot shutdown.	LCO 3.3.8 Required Action B	Table 3.4-1 Function 1	None	Unique with respect to Required Actions

Categories

I. Relaxation of Applicability
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L33	The allowed outage time for an inoperable relay was relaxed from four (4) hours to six (6) hours for placing inoperable channel in trip. Requirements for an inoperable relay were relaxed to eliminate the requirement to restore relay to OPERABLE status within save (7) days.	LCO 3.3.8 Required Action B	Table 3.4-1 Note 1	V, VII	Unique with respect to allowed outage time
3.3 L47	The surveillance method was relaxed to permit use of an actual signal in addition to a simulated signal for the functional test.	SR 3.3.8.3	Table 4.8-1 Functional Unit e	V	Unique with respect to acceptance criteria

Categories

I. Relaxation of Applicability
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.3, "INSTRUMENTATION"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L48	The surveillance requirements were relaxed to permit excluding injection of a test signal into the channel during the functional test.	SR 3.3.8.3	Table 4.8-1 Item b and d	V	Unique with respect to acceptance criteria. Bin with L45.

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.4, "REACTOR COOLANT SYSTEM,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.4.5, "RCS Loops-MODE 3" LCO 3.4.6, "RCS Loops-MODE 4" LCO 3.4.7, "RCS Loops-MODE 5, Loops Filled" LCO 3.4.8, "RCS Loops-MODE 5, Loops not Filled"					
3,4 L1	An allowance was added for Reactor Coolant Pumps (RCPs) and Residual Heat Removal (RHR) Pumps to be de-energized for up to one hour in any eight (8) hour period.	LCO 3.4.5, LCO 3.4.6, LCO 3.4.7	3.3.3.1, 3.3.1.4	None	Unique
3.4 L18	An allowed outage time of 72 hours for a single RCS Loop was added and an action to be in MODE 4 if the loop was not restored within 72 hours was added.	LCO 3.4.5 Required Actions A.1 and B.1	3.1.1.2	VII	Unique with respect to allowed outage time details only.

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.4, "REACTOR COOLANT SYSTEM,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.4 L19	An allowed outage time of one (1) hour was added for the condition where reactivity requirements are not met in the specification.	LCO 3.4.5 Required Action C.1	3.1.1.2	VII	Unique with respect to allowed outage time details only.
3.4 L2	Actions in response to no RCPs or RHR pumps in operation are changed from establishing a required shutdown margin to suspension of operations involving reduction in boron concentration.	LCO 3.4.6	3.1.1.1	VIII	Unique with respect to circumstances of report

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.4, "REACTOR COOLANT SYSTEM,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.4 L3	A requirement was deleted to submit a Special Report to the NRC within 30 days of failure to restore one RCP or RHR pump to operation after one (1) hour during shutdown.	LCO 3.4.6	3.1.1.1	VIII	Unique with respect to circumstances of report
3.4 L4	Requirement was deleted to close containment prior to exceeding 200°F when both RHR pumps are inoperable.	LCO 3.4.6	3.3.1.4	None	Unique

Categories

I. Relaxation of Applicability
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.4, "REACTOR COOLANT SYSTEM,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.4 L5	Note 1 was added to LCO 3.4.8 that allows all RHR pumps to be deenergized for up to 15 minutes under certain conditions. Note 2 was added to LCOs 3.4.7 and 3.4.8 which allows one RHR train to be inoperable for up to two (2) hours for surveillance testing.	LCO 3.4.6, LCO 3.4.7	3.3.1.4	None	Unique
3.4 L6	An allowance was added to permit use of a steam generator instead of an RHR train for decay heat removal in MODE 5.	LCO 3.4.7	3.3.1.4	None	Unique

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.4, "REACTOR COOLANT SYSTEM,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.4 L16	A requirement was deleted to submit a Special Report to the NRC within 30 days of failure to restore an inoperable RHR train to operation after 14 days during shutdown.	LCO 3.4.7, LCO 3.4.8	3.3.1.4	VIII	Unique with respect to circumstances of report
3.4 L17	A requirement to verify a backup method for decay heat removal when one RHR train is inoperable was deleted.	LCO 3.4.7, LCO 3.4.8	3.3.1.4	None	Unique

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.4, "REACTOR COOLANT SYSTEM,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.4.10, "Pressurizer Safety Valves"					
3.4 L7	The operability limits for the pressurizer code safety valve lift settings were increased from 2485 psig and 2560 psig to 2410 psig and 2560 psig.	LCO 3.4.10	3.1.1.3	None	Unique
3.4 L9	A note was added which allows the pressurizer safety valves lift settings to be outside operability limits for the purpose of testing under certain conditions.	LCO 3.4.10	3.3.1.3	None	Unique

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.4, "REACTOR COOLANT SYSTEM,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.4.12, "Low Temperature Overpressure Protection (LTOP) System					
3.4 L8	An allowance was added for one Safety Injection (SI) pump to be capable of injecting into the Reactor Coolant System (RCS) when the RCS is ≥ 175°F.	LCO 3.4.12	3.3.1.3	None	Unique

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.4, "REACTOR COOLANT SYSTEM,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.4.13, "RCS Operational Leakage"					
3.4 L10	A time was allowed for primary to secondary leakage to exceed requirements of four (4) hours and the time required to reach MODE 5 if the leakage is not restored to required limits was extended from 30 hours to 36 hours.	LCO 3.4.13	3.3.1.3	VII	Unique with respect to details of extended Allowed Outage Times
3.4 L11	The Surveillance Frequency for performing a primary system water inventory balance was extended from daily to once every 72 hours.	SR 3.4.13.1	Table 4.1-3, Item 9	II	Unique with respect to details of Frequency

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.4, "REACTOR COOLANT SYSTEM,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.4 L12	The allowance for a Pressure Isolation Valve (PIV) with leakage that exceeds limits to remain unisolated by two valves was extended to four(4) hours and to remain isolated by only one valve was extended to 72 hours.	LCO 3.4.14	3.1.5.4	None	Unique
3.4 L13	The length of time that the plant can be shut down before the Surveillance Requirement for performing PIV testing was extended from 72 hours to 7 days.	SR 3.4.14.1	Table 4.1-3, Item 17	None	Unique

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.4, "REACTOR COOLANT SYSTEM,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.4 L24	Requirements were deleted to record daily the integrity of a remaining PIV and record daily the position of the other closed valve in a line where the integrity of a PIV cannot be determined.	LCO 3.4.14	Table 4.1-3, Item 17	None	Unique
3.4 L14	The requirements for RCS Specific Activity were reduced to be applicable only to MODES 1, 2, and 3 with RCS temperature ≥ 500°F.	LCO 3.4.16 Applicability	3.1.4	I	Unique with respect to details of applicability

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.4, "REACTOR COOLANT SYSTEM,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.4 L15	The Surveillance Frequency for verifying reactor coolant gross specific activity was extended from once every 72 hours to once per 7 days.	SR 3,4,16.1	Table 4.1-2, item 1	II	Unique with respect to frequency details only,
LCO 3.4.17, "Chemical and Volume Control System (CVCS)"					
3.4 L20	Requirements to bring the plant to MODE 3 and cool down and depressurize the RCS were added where no actions previously existed.	LCO 3.4.17 Required Actions D.1, D.2, and D.3	3.2.3	None	Unique

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.4, "REACTOR COOLANT SYSTEM,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.4 L21	Specific requirements for operability of boron addition pathways were relaxed to apply only to two pathways of makeup water from the Refueling Water Storage Tank (RWST).	LCO 3.4.17	3.2.2	None	Unique
3.4 L22	The allowed time for one charging pump to be inoperable was extended from 24 hours to 72 hours.	LCO 3.4.17, Required Action A.1	3.2.3	IV	Allowed Outage Time Extension from 24 hours to 72 hours
3.4 L23	A requirement was added which allowed 72 hours for one makeup water pathway from the RWST to be inoperable.	LCO 3.4.17, Required Action B.1	3.2.3	None	Unique

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.5, "EMERGENCY CORE COOLING SYSTEMS (ECCS)"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.5.1, "Accumulators"					
3.5 L1	The allowed time for an accumulator to be inoperable due to boron concentration not within limits was relaxed from four (4) hours time to 72 hours.	LCO 3.5.1 Required Action A.1	3.3.1.2	VII	Unique with respect to allowed outage time extension only

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.5, "EMERGENCY CORE COOLING SYSTEMS (ECCS)"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.5.2, "ECCS-Operating"					
3.5 L2	The condition associated with an inoperable Emergency Core Cooling System (ECCS) component was extended to allow one or more trains of ECCS to be inoperable as long as 100% of the ECCS flow equivalent of a single operable train is available. The allowed time for one or more ECCS trains to be inoperable was relaxed from 24 hours to 72 hours.	LCO 3.5.2 Required Action A.1	3.3.1.2	III, IV	
3.5 L8	A note was added to permit operation in MODE 3 with one required Safety Injection (SI) pump inoperable for a limited period of four (4) hours pursuant to the specifications for Reactor Coolant System overpressure protection.	LCO 3.5.2	3.3.1.2	None	Unique

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.5, "EMERGENCY CORE COOLING SYSTEMS (ECCS)"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.5 L3	A requirement to restrict surveillance testing of the ECCS such that the ECCS is prevented from injecting into the Reactor Coolant System (RCS) was deleted.	SR 3.5.2.4 SR 3.5.2.5	4.5.1.1	None	Unique
3.5 L4	Detailed requirements for performance of surveillance testing relating to control board indication and visual observation that all components have received the safety injection single in the proper sequence and timing were deleted.	SR 3.5.2.4 SR 3.5.2.5	4.5.1.2	None	Unique
3.5 L5	Detailed requirements to monitor control room indication and controls during performance of surveillance testing were deleted.	SR 3.5.2.1	4.5.2.1	None	Unique

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.5, "EMERGENCY CORE COOLING SYSTEMS (ECCS)"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.5.3, "ECCS-Shutdown"					
3.5 L6	Requirements for the ECCS during MODE 4 were relaxed to required only one train of ECCS to be required.	LCO 3.5.3 Required Action A.1	3.3.1.2 3.3.1.3	None	Unique

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.5, "EMERGENCY CORE COOLING SYSTEMS (ECCS)"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.5.4, "Refueling Water Storage Tank"					
3.5 L7	An allowed outage time of 8 hours was added to the requirements for the Refueling Water Storage Tank (RWST) to be inoperable due to boron concentration not within limits.	LCO 3.5.4 Required Action A.1	3.3.1.1	None	Unique

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.6, "CONTAINMENT SYSTEMS,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.6.1, "Containment"					
none					
LCO 3.6.2, "Containment Air Lock"					
none					

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.6, "CONTAINMENT SYSTEMS,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.6.3, "*******"					
3.6 L5	The allowed outage time for a single inoperable containment spray train was extended to 72 hours from 24 hours as was previously required. If the train is not restored to operable status as required, the allowed time to bring the plant to cold shutdown was extended to 156 hours from 72 hours plus the time required to shutdown the reactor utilizing normal operating procedures.	LCO 3.6.6 Required Actions A.1, B.1, and B.2	3.6.2.2 3.6.2.3	VII	Unique with respect to allowed outage times only

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.6, "CONTAINMENT SYSTEMS,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.6 L6	Restrictions that required no inoperability of the diverse cooling subsystem when a containment fan cooler or containment spray pump is inoperable were deleted.	LCO 3.6.6	3.6.2.2	None	Unique
3.6 L7	An allowance for two (2) containment cooling trains to be inoperable for up to 72 hours was added.	LCO 3.6.6 Required Action D.1	3.6.2.2	VII	Unique with respect to allowed outage time details
3.6 L8	A requirement to test the containment cooling units monthly was deleted.	LCO 3.6.6	4.5.1.6	None	Unique

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to edit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.6, "CONTAINMENT SYSTEMS,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.6.7, "Spray Additive System"					
3.6 L9	The allowed outage time for one (1) inoperable spray system flow path for 24 hours was extended to apply to the spray additive system with at least 100% of the spray additive system train flow available, and the allowed outage time was extended to 72 hours from 24 hours.	LCO 3.6.7 Required Action A.1	3.6.2.2	III, VII	Unique with respect to train and allowed outage time details
3.6 L10	The allowed outage time for an inoperable spray additive system in MODE 3 was extended to 48 hours from no time allowed.	LCO 3.6.7 Required Actions B.1 and B.2	3.6.2.3	VII	Unique with respect to allowed outage time details only

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.6, "CONTAINMENT SYSTEMS,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.6 L11	The required surveillance frequency for verifying NaOH concentration in the spray additive tank was extended from monthly with a maximum time between surveillances of 45 days to 184 days.	SR 3.6.7.3	Table 4.1-2 Item 5	II	Unique with respect to frequency details only

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.6, "CONTAINMENT SYSTEMS,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.6.8, "Isolation Valve Seal Water System"					
3.6 L12	The allowed outage time for a single inoperable Isolation Valve Seal Water (IVSW) system was extended to apply to the entire system. The allowed outage time for the IVSW system was extended from 24 hours to 72 hours. The time allowed to reach MODE 3 when the IVSW cannot be restored as required was extended to 80 hours from 32 hours.	LCO 3.6.8 Required Action A.1, B.1	3.6.6.1	III, VII	Unique with respect to train and allowed outage time details only

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.7, "PLANT SYSTEMS,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.7.1, "Main Steam Safety Valves					
3.7 L1	An allowance was added for one or more Main Steam Safety Valves (MSSV) to be inoperable.	LCO 3.7.1, Table 3.7.1-1	3.4.1.a	None	Unique
3.7 L2	A Note was added to ITS actions for separate condition entry for each inoperable MSSV.	LCO 3.7.1 Note to Actions	3.4.1.a	None	Unique
LCO 3.7.2, "Main Steam Isolation Valves"					
3.7 L3	The requirements for the Main Steam Isolation Valves (MSIVs) were relaxed to apply to only when the MSIVs are open	LCO 3.7.2 Applicability	3.4.1.a	I	Unique with respect to details of Applicability.

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.7, "PLANT SYSTEMS,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.7 L4	The frequency for performing a Surveillance on the MSIVs was extended from every 15 months to as specified by IST.	SR 3.7.2.1	4.7.1	II	Unique with respect to frequency details only.
LCO 3.7.4, "Auxiliary Feedwater System"					
3.7 L5	An action and Note were added for the condition of a complete loss of the Auxiliary Feedwater (AFW) Function.	LCO 3.7.4 RA E.1	3.4.4	None	Unique
3.7 L6	The frequency for performing testing of the AFW pumps was extended from monthly to Staggered Test Basis (i.e., 31 days to 93 days for any one pump.	SR 3.7.4.2	4.8.1, 4.8.2	II	Unique with respect to frequency details only.

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.7, "PLANT SYSTEMS,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.7 L20	A Surveillance Requirement was relaxed to require that the AFW Pumps be no longer run for 15 minutes.	SR 3.7.4.2	4.8.1, 4.8.2	VI	Unique with respect to details of acceptance criterion.
3.7 L7	The frequency for performing a Surveillance on AFW valves was extended from 31 days to 18 months.	SR 3.7.4.3	4.8.3	II	Unique with respect to frequency details only.

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.7.6, "Component Cooling Water System," and LCO 3.7.7, Service Water System"					
3.7 L8	Actions required when the specification is not met were changed from a single component basis to a train basis for the Component Cooling Water (CCW) System and the Service Water System (SWS).	LCO 3.7.6 LCO 3.7.7	3.3.3.2, 3.3.3.3, 3.3.4.2, 3.3.4.3	III	LCO stated in terms of Trains rather than components
3.7 L9	The allowed time for one inoperable CCW System or SWS train was extended from 24 to 72 hours.	LCO 3.7.6 LCO 3.7.7	3.3.3.2, 3.3.4.2	IV	Allowed Outage Time Extension from 24 hours to 72 hours

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.7, "PLANT SYSTEMS,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.7.9, "Control Room Emergency Filtration System (CREFS)," and LCO 3.7.10, "Control Room Emergency Air temperature Control (CREATC)"					
3.7 L10	The requirements for the CREFS and CREATC were reduced to apply only to MODES 1 through 4, movement of irradiated fuel, and CORE ALTERATIONS.	LCO 3.7.9 LCO 3.7.10	3.15.1	I	Unique with respect to details of Applicability.
3.7 L11	An action was added to suspend CORE ALTERATIONS or movement of irradiated fuel (i.e., exit Applicability) rather than place CREFS into emergency mode.	LCO 3.7.9 LCO 3.7.10	3.15.2.a	V	Unique with respect to details of Required Action.

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.7, "PLANT SYSTEMS,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.7 L12	A requirement was deleted to suspend reduction of Shutdown Margin if both trains of CREFS or CREATC are inoperable.	LCO 3.7.9 LCO 3.7.10	3.15.2.b	None	Unique
3.7 L13	A Surveillance Requirement was relaxed to require that the CREFS be operated for 15 minutes rather than 1 hour.	SR 3.7.9.1	4.15.b	VI	Unique with respect to details of acceptance criterion.
3.7 L14	A Surveillance Requirement was relaxed to no longer verify positive pressure during operational testing of the CREFS.	SR 3.7.9.1	4.15.c	VI	Unique with respect to details of acceptance criterion.

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.7, "PLANT SYST[illegible]"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.7 L15	The frequency for performing a Surveillance was extended from 18 months to 18 months on a Staggered Test Basis	SR 3.7.9.4	4.15.f.4	II	Unique with respect to frequency details only.
3.7 L16	The allowed time that one train of CREATC can be inoperable was extended from 7 days to 30 days.	LCO 3.7.10	3.15.1.a, 3.15.2.a	VII	Unique with respect to Allowed Outage Time details only.
LCO 3.7.11, "Fuel Building Air Cleanup System"					
3.7 L19	An action was added to suspend movement of irradiated fuel assemblies (i.e., exit Applicability) rather than terminate fuel handling operations.	LCO 3.7.11 Required Action A.1	3.8.2	V	Unique with respect to details of Required Action.
LCO 3.7.15, "Secondary Specific Activity"					

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.7, "PLANT SYSTEMS,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.7 L17	The requirements for secondary specific activity were reduced to apply only to MODES 1 through 4 from "all modes of operation from cold shutdown."	LCO 3.7.15	3.4.2	I	Unique with respect to details of Applicability.
3.7 L18	The frequency for performing a Surveillance for secondary specific activity was extended from 72 hours to 31 days	SR 3.7.15.1	Table 4.1-2, Item 8	II	Unique with respect to frequency details only.

Categories

I. Relaxation of Applicability
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.8, "ELECTRICAL POWER SYSTEMS,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.8.1, "AC Sources-Operating"					
3.8 L1	The allowed time to declare required features with no offsite power available inoperable when its redundant required feature is inoperable was extended from no allowed time to 12 hours. The allowed time to declare required features supported by the inoperable diesel generator when its redundant required feature is inoperable was extended from no allowed time to 4 hours.	LCO 3.8.1 Required Action A.1 and B.2	1.3	VII	Unique with respect to allowed outage time extension only.

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.8, "ELECTRICAL POWER SYSTEMS,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.8 L8	The required time that the diesel generator is tested between 2650 kW and 2750 kW is reduced from two (2) hours to ≥ 1.75 hours.	SR 3.8.1.11	4.6.1.5	None	Unique
LCO 3.8.3, "Diesel Fuel Oil and Starting Air"					
3.8 L2	The time allowed for restoration of fuel oil to within limits is extended from no allowed time to 48 hours.	LCO 3.8.3 Required Action A.1 and B.1	3.7.1	VII	Unique with respect to allowed outage time details only.

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.8, "ELECTRICAL POWER SYSTEMS,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.8.4, "DC Sources-Operating"					
3.8 L4	The Surveillance Frequency for verifying battery voltage is ≥ 125.7 volts was extended from daily five days per week to once every 7 days.	SR 3.8.4.1	4.6.5	II	Unique with respect to frequency details only

Categories

I. Relaxation of Applicability
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.8.6, "Battery Cell Parameters"					
3.8 L3	The time allowed for battery cell parameters to not be within Category A and B limits was extended from no time to 31 days when pilot cell electrolyte level and float voltage are verified to meet Category C limits within 1 hour and that battery cell parameters are verified to meet Category C limits within 24 hours and every 7 days thereafter.	LCO 3.8.6 Required Actions A.1, A.2, and A.3	4.6.3	VII	Unique with respect to allowed outage time details only

Categories

I. Relaxation of Applicability
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.8, "ELECTRICAL POWER SYSTEMS,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.8 L6	The Surveillance Frequency for verifying pilot cell voltage and temperature was extended from daily five days per week to once every 7 days.	SR 3.8.6.1	4.6.3	II	Unique with respect to frequency details only
3.8 L7	A surveillance requirement to subject the batteries to an equalizing charge annually was deleted.	LCO 3.8.6	4.6.3	None	Unique
3.8 L10	The Surveillance Frequency for verifying average electrolyte temperature was extended from 5 days per week to once every 92 days.	SR 3.8.6.3	4.6.3	II	Unique with respect to frequency details only

Categories

I. Relaxation of Applicability
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.8, "ELECTRICAL POWER SYSTEMS,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.8 L11	The Surveillance Frequency for verifying battery cell parameters was extended from 31 days to 92 days.	SR 3.8.6.2	4.6.3	II	Unique with respect to frequency details only
LCO 3.8.9, "Electrical Distribution Systems-Operating"					
3.8 L5	The time allowed for restoration of an inoperable AC electrical power distribution system is extended from no allowed time to 8 hours and 16 hours from discovery of failure to meet LCO.	LCO 3.8.9 Required Action A.1	3.7.1	VII	Unique with respect to allowed outage time details only

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.8, "ELECTRICAL POWER SYSTEMS,"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.8 L9	A requirement to test thermal trip elements of molded case circuit breakers is removed from a surveillance requirement.	SR 3.8.9.2 SR 3.8.9.3	Table 4.1-3, Item 18	None	Unique

Categories

I. Relaxation of Applicability
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.9, "REFUELING OPERATIONS"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.9.1, "Boron Concentration"					
3.9 L1	The required frequency for performing the surveillance requirement to verify the boron concentration in the primary coolant during refueling was relaxed from once per shift to once per 72 hours	DR 3.9.1.1	3.8.1	II	Unique with respect to surveillance frequency details only

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC
IX. Relaxation of LCO Requirement

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.9, "REFUELING OPERATIONS"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.9.2, "Nuclear Instrumentation"					
3.9 L5	The required actions for the condition when any of the refueling specifications were not met were relaxed to apply only to the condition where both source ranges are inoperable.	LCO 3.9.2 Required Actions A.2, B.1	3.8.1	V	Unique with respect to required action details and applicability

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC
IX. Relaxation of LCO Requirement

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.9, "REFUELING OPERATIONS"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.9.3, "Containment Penetrations"					
3.9 L2	The requirements for closure of the containment equipment door were relaxed to require only four (4) bolts in place rather than all bolts in place as previously required.	LCO 3.9.3	3.8.1	IX	Unique with respect to Specification requirements only

Categories

I. Relaxation of Applicability
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC
IX. Relaxation of LCO Requirement

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.9, "REFUELING OPERATIONS"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.9 L9	The requirements for closure of containment penetrations were relaxed from requiring all automatic valves to be operable or have at least one valve in a penetration be closed to at least one manual or automatic valve, blind flange or equivalent being closed.	LCO 3.9.3	3.8.1	IX	Unique with respect to Specification requirements only
3.9 L7	The required frequency for performing the surveillance requirement to verify the containment purge system was relaxed from prior to refueling operations to 18 months.	LCO 3.9.3	3.8.1	II	Unique with respect to surveillance frequency details only

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC
IX. Relaxation of LCO Requirement

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.9, "REFUELING OPERATIONS"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.9 L8	The requirements for performing a surveillance to verify that each valve in the containment vent and purge system actuates to the correct position were relaxed to permit the surveillance to be met utilizing an actual signal in addition to the currently required simulated signal.	LCO 3.9.3	3.8.1	VI	Unique with respect to surveillance requirement acceptance criteria

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC
IX. Relaxation of LCO Requirement

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.9, "REFUELING OPERATIONS"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.9 L3	The requirements for maintaining containment purge penetration system operable when the system is not in operation were relaxed from requiring one valve to be securely closed to requiring both containment isolation valves in the penetration operable	LCO 3.9.3	3.8.1	IX	Unique with respect to Specification requirements only

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC
IX. Relaxation of LCO Requirement

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.9, "REFUELING OPERATIONS"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.9 L4	The required actions for the condition when any of the refueling specifications were not met were relaxed to require that core alterations and movement of irradiated fuel be suspended, rather than to suspend all refueling operations as was previously required.	LCO 3.9.3 Required Actions A.1, A.2	3.8.1	V	Unique with respect to required action details

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC
IX. Relaxation of LCO Requirement

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.9, "REFUELING OPERATIONS"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.9.4, "RHR and Coolant Circulation-High Water Level"					
3.9 L6	The required actions for the condition when any of the refueling specifications were not met were relaxed to require that core alterations and movement of irradiated fuel be suspended, rather than to suspend all refueling operations as was previously required.	LCO 3.9.4 Required Actions A.1 and A.2	3.8.1	V	Unique with respect to required action details

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC
IX. Relaxation of LCO Requirement

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.9, "REFUELING OPERATIONS"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.9.7, "Containment Purge Filter System"					
3.9 L9	Requirements for isolation of a containment purge system penetration when the system is inoperable were relaxed to include additional means of isolation previously not considered. The additional means of isolation are a closed manual or automatic isolation valve, blind flange, or an equivalent method that can provide a temporary atmospheric pressure and ventilation barrier.	LCO 3.9.7 Required Action A.1	3.8.1, 3.8.2	V	Unique with respect to required action details

Categories

I. Relaxation of Applicability
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC
IX. Relaxation of LCO Requirement

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 3.9, "REFUELING OPERATIONS"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.9 L4	The required actions for the condition when any of the refueling specifications were not met were relaxed to require that core alterations and movement of irradiated fuel be suspended, rather than to suspend all refueling operations as was previously required.	LCO 3.9.4 Required Actions A.1 and A.2	3.8.1	V	Unique with respect to required actions that are deleted

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC
IX. Relaxation of LCO Requirement

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 4.0 "Design Features"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
4.0 "Design Features"					
4.0 L1	Requirements regarding Design Features for the reactor core were expanded to allow for limited substitution of filler rods and limited use of lead test assemblies	4.2.1	5.3	None	Unique with respect to applicability details

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 5.0, "ADMINISTRATIVE CONTROLS"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
Section 5.2, "Organization"					
5.0 L1	The position of qualified radiation control technician was allowed to be vacant for two (2) hours to provide for unexpected absence, provided immediate action is taken to fill the required position.	Section 5.2.2	6.2.3	None	Unique
5.0 L2	The allowance for shift complement to be one less than the minimum requirement for two (2) hours was relaxed to allow that the shift complement can be less than the minimum requirement for two (2) hours.	Section 5.2.2	6.2.3	None	Unique

Categories

I. Relaxation of Applicability
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 5.0, "ADMINISTRATIVE CONTROLS"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
5.0 L3	The requirement that the Manager-Operations shall hold or have held a senior reactor operators license for either HBRSEP or a similar plant and that the Manager-Shift Operations shall hold a senior operator license was relaxed to the Manager-Operations or the Superintendent in charge of Shift Crews shall hold a senior reactor operators license.	Section 5.2.2	6.3.2	None	Unique

Categories

I. Relaxation of Applicability
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relocation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 5.0, "ADMINISTRATIVE CONTROLS"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
Section 5.3, "Unit Staff Qualifications"					
5.0 L4	The qualification requirements for the manager of the radiation protection function were relaxed from referencing Regulatory Guide 1.8, September 1975, to ANSI/ANS 3.1-1981, which relaxes the experience requirement from five (5) years to four (4) years.	5.3.1	6.3.3	None	Unique

Categories

I. Relaxation of Applicability
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 5.0, "ADMINISTRATIVE CONTROLS"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
Section 5.6, "Reporting Requirements"					
5.0 L5	The due date for the Occupational Radiation Exposure Report was relaxed from March 1 to April 30 of each year. The due date for the annual Radiological Environmental Operating Report was relaxed from May 1 to May 15 of each year.	Section 5.6.2	6.9.2.1 6.9.2.3	None	Unique
5.0 L6	A special report required when reactor coolant exceeds specific activity limits was deleted.	Section 5.6	6.9.1.2.1	None	Unique

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Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 5.0, "ADMINISTRATIVE CONTROLS"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
5.0 L7	The requirement for reporting information in the Radiological Effluent Release Report was relaxed from twice per year to once a year.	Section 5.6.3	6.9.1.3	None	Unique
5.0 L8	The due date for the monthly operating report was relaxed from the 10th of the month to the 15th of the month.	Section 5.6.4	6.9.1.4	None	Unique

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE L - MATRIX OF LESS RESTRICTIVE CHANGES
SECTION 5.0, "ADMINISTRATIVE CONTROLS"

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
5.0 L9	The due date for the steam generator tube inservice inspection report was relaxed from being included in the Operating Report for the period in which the inspection was completed to the Operating Report for the period beginning after the inspection was completed.	Section 5.6.8	4.2.1.3	None	Unique
5.0 L10	The requirement for the Containment Leak Rate Test Report was deleted.	Section 5.6	6.9.3.1	None	Unique

Categories

I. Relaxation of Applicability.
II. Relaxation of Surveillance Frequency
III. LCO stated in terms of Trains rather than components
IV. Allowed Outage Time Extension from 24 hours to 72 hours
V. Relaxation of Required Actions to exit Applicability
VI. Relaxation of Surveillance Requirement acceptance criteria
VII. Relaxation of Allowed Outage Time
VIII. Deletion of Requirement for 30 day Special Report to NRC

TABLE RL - RELOCATED SPECIFIC-ITEM MATRIX

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 2.0 LA1	6.7.1.c,d,e	Safety Limit reporting requirements	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of reporting requirements	2
ITS 3.0 LA1	4.0	"Prior to returning the system to service, the specified calibration and testing surveillance shall be performed."	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of testing details	3
ITS 3.1 LA1	3.10.6.3 and Figure 3.10-2,	Shutdown Margin requirements for an inoperable full length control rod	Core Operating Limits Report (COLR)	10 CFR 50.59	Relocation of values associated with requirements	1
ITS 3.1 LA1	3.10.8.1	"Shutdown Margin - Hot Shutdown"	COLR	10 CFR 50.59	Relocation of values associated with requirements	1
ITS 3.1 LA1	3.10.8.2	"Shutdown Margin - Cold Shutdown"	COLR	10 CFR 50.59	Relocation of values associated with requirements	1
ITS 3.1 LA1	3.10.1.4	"At 50% of the cycle as defined by burnup, the limits shall be adjusted to the end-of-core values as specified in the COLR."	COLR	10 CFR 50.59	Relocation of procedural detail	1

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 3.1 LA2	3.10.1.3	"If bank insertion is not restored to the specified limits"..."the reactor shall be placed in the hot shutdown condition utilizing normal operating procedures within six hours."	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details regarding how required action is accomplished.	3
ITS 3.1 R1	3.10.7	Restrictions placed on power ramp rate following a shutdown where core fuel assemblies have been handled	UFSAR	10 CFR 50.59	Relocation of methodology for reactor power changes	
ITS 3.2 LA1	3.10.2.1	Algorithms describing the limits of $F_Q(Z)$	COLR	10 CFR 50.59	Relocation of descriptive information	1
ITS 3.2 LA1	3.10.2.2	Algorithms describing the limits of $F_Q(Z)$ with core penalty factor, V(Z), included	COLR	10 CFR 50.59	Relocation of descriptive information	1
ITS 3.2 LA2	3.10.2.1	Algorithm describing the limits of $F\Delta H$, uncertainty factor, and power factor Multiplier	COLR	10 CFR 50.59	Relocation of descriptive information	1

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 3.2 LA3	3.10.2.11	Details concerning the redefinition of the axial flux target bands	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of descriptive information and methodology details	2
ITS 3.2 LA4	3.10.2.2.2	Details concerning the description of determining $F_Q(Z)$ from a power distribution map in terms of measurement and engineering factor uncertainties, and Allowable Power Level	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of descriptive information and methodology details	2
ITS 3.3 LA1	2.3.1.2.d	Details concerning how the electronic dynamic compensation and delta flux input to the Overtemperature ΔT Reactor Protection System (RPS) function affects its setpoint	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of descriptive information	1
ITS 3.3 LA1	2.3.1.2.e	Details concerning how the electronic dynamic compensation and delta flux input to the Overpower ΔT RPS function affects its setpoint	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of descriptive information	1

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 3.3 LA2	2.3.3	"The RCS narrow range temperature sensors response time shall be less than or equal to a 4.0 second lag constant."	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of testing details	1
ITS 3.3 LA3	3.10.5.1.b	"The reactor shall not be made critical"..."unless the reactor trip bypass breakers are racked out or removed."	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of procedure details	3
ITS 3.3 LA4	Table 4.1-1,	Instrument channel Testing Requirements.	Technical Requirements Manual (TRM) Offsite Dose Calculation Manual (ODCM)	10 CFR 50.59	Relocation of tests not required to demonstrate operability	4
ITS 3.3 LA6	Table 3.5-5, Note 5,	Preplanned alternate method of monitoring be available	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning availability of preplanned alternate method of monitoring	3

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 3.3 LA7	Table 3.5-2 Item 15A.	Control Rod Misalignment Monitor function as provided by the "ERFIS Rod Position Deviation" feature and related ACTION No. 9.	TRM	10 CFR 50.59	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits	4
ITS 3.3 LA7	Table 3.5-2 Item 15B.	Control Rod Misalignment Monitor function as provided by the "Quadrant Power Tilt Monitor" and related ACTION No. 10.	TRM	10 CFR 50.59	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits	4

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 3.3 LA8	Table 4.1-1 Item 4, Remark (4) associated with RTD cross calibration and Table 4.1-1 Item 30, Remark (1) associated with testing of the RTB UV and shunt trips.	Remark associated with RTD cross calibration and Remark associated with testing of the RTB UV and shunt trips.	Bases for ITS SR 3.3.1.4 and SR 3.3.1.12	Bases Control Program in ITS Section 5.5.14	Relocation of testing details	3
ITS 3.3 LA9	Table 3.5-1 Items 6.a and 6.b	The Functions' channel action is "Trip normal supply breaker."	UFSAR	10 CFR 50.59	Relocation of descriptive information	1
ITS 3.3 R1	Table 3.5-5 Item No. 3 and 12, Notes 2 and 7	Requirements for the RCS Subcooling Monitor and Reactor Vessel Level Instrumentation System (RVLIS)	TRM	10 CFR 50.59	Specifications that do not meet 10 CFR 50.36 criteria	

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 3.3 R1	Table 3.5-5 Item No. 7 and Note 4	Requirements for the Noble Gas Effluent Monitor - Main Steam Line, Noble Gas Effluent Monitor - Main Vent Stack -High Range, and Noble Gas Effluent Monitor - Spent Fuel Pit Lower Level	TRM	10 CFR 50.59	Specifications that do not meet 10 CFR 50.36 criteria	
ITS 3.3 R1	Table 4.1-1 Item No. 38	Testing requirements for the Noble Gas Effluent Monitor - Main Steam Line, Noble Gas Effluent Monitor - Main Vent Stack -High Range, and Noble Gas Effluent Monitor - Spent Fuel Pit Lower Level	TRM	10 CFR 50.59	Specifications that do not meet 10 CFR 50.36 criteria	
ITS 3.3 R1	Table 4.1-1 Item No. 34 and 48 and associated testing require-ments	Testing requirements for the RCS Subcooling Monitor and Reactor Vessel Level Instrumentation System (RVLIS)	TRM	10 CFR 50.59	Specifications that do not meet 10 CFR 50.36 criteria	

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 3.4 LA1	3.1.2.1.a	"Over the temperature range from cold shutdown to hot operating conditions, the heatup rate shall not exceed 60°F in any one hour."	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of methodology for heatup of reactor	2
ITS 3.4 LA1	3.1.2.1.b	"Allowable combinations of pressure and temperature for a specific cooldown rate are below and to the right of the limit lines for that rate as shown on Figure 3.1-2. This rate shall not exceed 100°F/hr in any one hour. The limit lines for cooling rates between those shown in Figure 3.1-2 may be obtained by interpolation."	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of methodology for cooldown of reactor and descriptive information	2

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 3.4 LA1	3.1.2.1.c	"Primary system hydrostatic leak tests may be performed as necessary, provided the temperature limitation as noted on Figure 3.1-1 is not violated. Maximum hydrostatic test pressure should remain below 2350 psia."	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of testing details	2
ITS 3.4 LA1	3.1.2.4.a	Requirements for maintaining the pressure-temperature limit curves in TS Figures 3.1-1 and 3.1-2	UFSAR	10 CFR 50.59	Relocation of details concerning maintaining RCS P/T curves	2
ITS 3.4 LA1	3.1.2.4.b	Reporting requirements of results of irradiated specimen samples analysis and updated heatup and cooldown curves	UFSAR	10 CFR 50.59	Relocation of reporting requirements	3
ITS 3.4 LA2	3 1.1.1.a.1	The specific 4% shutdown margin when < 2% Rated Thermal Power (RTP) and < 2 reactor coolant pumps operating	COLR	10 CFR 50.59	Relocation of values associated with requirements	2

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 3.4 LA3	3.1.1.3.a	"At least one Pzr code safety valve shall be operable whenever the Reactor Head is on the vessel and the RCS is not open for maintenance."	TRM	10 CFR 50.59	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits	2
ITS 3.4 LA4	4.2.4.1.a	Requirement that each Pressurizer Power Operated Relief Valve (PORV) be demonstrated operable by performing a channel calibration at each refueling	TRM	10 CFR 50.59	Relocation of details concerning testing methology not required for operability	2
ITS 3.4 LA4	4.2.4.3	Requirement to demonstrate that the nitrogen accumulators for the Pressurizer PORVs are operable by cycling the PORVs through one complete cycle at each refueling	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning testing methodology	3

TABLE RL - RELOCATED SPECIFIC-ITEM MATRIX

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 3.4 LA5	3.1.5.4.a	Requirement that all pressure isolation valves listed in Table 3.1-1 be functional as a pressure isolation device except as specified in TS Section 3.1.5.4.b during reactor operation and hot shutdown conditions	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of descriptive details concerning operability	2
ITS 3.4 LA5	3.1.5.4.b	The compensatory measure for a non-functional pressure isolation valve; "Manual valves shall be locked in the closed position."	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of descriptive details associated with taking a required action	2
ITS 3.4 LA5	Table 4.1-3 Item No. 17	Requirement to perform Primary Coolant System check valve tests after maintenance, repair or replacement work is performed	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details associated with post maintenance testing to declare operability	3

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 3.4 LA5	Table 4.1-3 Item No. 17.1 Note a.	Allowance that Pressure Isolation Valve (PIV) leakage may be measured indirectly if accomplished in accordance with approved procedures and supported by computations showing that the method is capable of demonstrating valve leakage compliance	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning testing methodolgy	3
ITS 3.4 LA5	Table 4.1-3 Item No. 17.1 Note b.	Minimum test differential pressure for PIVs shall be ≥ 150 psid.	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning testing methodolgy	3
ITS 3.4 LA5	Table 4.1-3 Item No. 17.1 Note c.	Allowance that more than one PIV may be tested in parallel provided the total leakage does not exceed 5 gpm	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning testing methodolgy	3
ITS 3.4 LA5	Table 3.1-1	Listing of safety injection system PIVs	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of descriptive system information	1

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 3 4 LA6	Table 4.1-2 Item No. 1	Requirement to perform reactor coolant radiochemical test on a monthly frequency	TRM	10 CFR 50.59	Relocation of details concerning testing methology not required for operability	2
ITS 3.4 LA6	Table 4.1-2 Item No. 2	Requirement to perform reactor coolant boron concentration test on a twice/week frequency	TRM	10 CFR 50.59	Relocation of details concerning testing methology not required for operability	2
ITS 3.4 LA6	Table 4.1-2 Note (1)	Description of a gross activity analysis.	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning testing methodolgy	3
ITS 3.4 LA6	Table 4.1-2 Note (2)	Description of a radiochemical analysis	TRM	10 CFR 50.59	Relocation of details concerning testing methodolgy	3
ITS 3.4 LA7	Table 4.1-2 Item No. 4	Requirement to perform Boric Acid Tank boron concentration test on a twice/week frequency	TRM	10 CFR 50.59	Relocation of details concerning testing methology not required for operability	3

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 3.4 LA8	Table 4.1-3 Item No. 14	Requirement to perform RHR compartment fan functional test and laboratory tests of filter media on a once per operating cycle frequency	TRM	10 CFR 50.59	Relocation of details concerning testing methology not required for operability	3
ITS 3.4 LA9	Table 4.1-2 Item No. 10	Requirement to perform S/G samples 5 days/week	TRM	10 CFR 50.59	Relocation of details concerning testing methology not required for operability	3
ITS 3.4 R1	Table 4.1-2 Item No. 1	Requirement to sample the reactor coolant system for Chloride and Oxygen on a frequency of 5 times per week	TRM	10 CFR 50.59	Relocation of details concerning testing methology not required for operability	3
ITS 3.4 LA10	Table 4.1-2 Note (3)	Requirement to sample Stack Gas Iodine and Particulate on a weekly bases when iodine or particulate radioactivity levels exceed 10% of the limit in TS Section 3.9.2.1, the sampling frequency shall be increased to a minimum of once per day	ODCM	ODCM in ITS Section 5.5.1	Relocation of details concerning Radiological Effluent Technical Specifications sampling	2

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 3.4 LA11	3.2.1	Requirement for an injection flow path and boric acid equivalent to that supplied from the RWST in all plant conditions with fuel in the vessel	TRM	10 CFR 50.59	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits	1
ITS 3.4 LA12	3.2.2.b,c,e, & f	Requirements for boric acid transfer pump, boric acid tanks, heat tracing and primary water storage tank	TRM	10 CFR 50.59	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits	1
ITS 3.5 LA1	3.3.1.2.e	Specific exclusion of the safety injection hot injection pathways and valves from the requirements of TS Section 3.3.1.2	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits	1

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 3.5 LA2	3.3.1.1.c, d, e, & f	Details of ECCS Operability	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of system description details	1
ITS 3.6 LA1	1.7.a	Details specifying non-automatic isolation valves be closed and blind flanges be properly installed	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning methodology for meeting requirements	2
ITS 3.6 LA2	4.5.1.3	"The test shall be performed with the isolation valves in the spray supply lines at the containment and spray additive tank blocked closed."	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning testing methodolgy	3
ITS 3.6 LA3	1.7.d "	"Manual valves qualifying as automatic containment isolation valves are secured closed."	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning methodology for meeting requirements	2
ITS 3.6 LA4	3.6.4.3	Details of testing of 42 inch purge valves	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning testing methodology	3

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 3.6 LA5	1.7.d "	"All automatic trip valve required to be closed during accident conditions are operable or are secured closed."	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning methodology for meeting requirements	2
ITS 3.6 LA6	1.7.b 1.7.c "	"Equipment door is properly closed and sealed." At least one door in the personnel air lock is properly closed and sealed."	Bases Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning methodology for meeting requirements	2
ITS 3.6 R1	3.3.5	"The reactor shall not be made critical unless the valves of the post accident containment venting system are operable."	TRM	10 CFR 50.59	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits	
ITS 3.7 LA1	Table 4.1-3 Item No. 12,	Requirement to check closure of Turbine Steam Stop, Control, Reheat Stop, and Interceptor Valves on a quarterly frequency	TRM	10 CFR 50.59	Relocation of details concerning testing not required for operability	2

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 3.7 LA2	3.13.1.a	Requirement that when the reactor is at power or hot shutdown, if a snubber is determined to be inoperable and an engineering evaluation cannot validate the operability of the supported component then the supported component shall be declared inoperable. If operability can be validated then the snubber shall be returned to operable status within 72 hours.	TRM	10 CFR 50.59	Relocation of descriptive details concerning components that support operability	2
ITS 3.7 LA2	3.13.1.b	"If a snubber is determined to be inoperable while the reactor is in cold shutdown, the snubber (if needed for a supported component protection) shall be repaired and reinstalled or replaced prior to reactor startup."	TRM	10 CFR 50.59	Relocation of testing details concerning components that support operability	2

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 3.7 LA2	4.13	Snubber Testing Requirements	TRM	10 CFR 50.59	Relocation of testing details concerning components that support operability	2
ITS 3.7 LA3	4.15.a .	Requirements to verify Control Room air temperature every 12 hrs	TRM	10 CFR 50.59	Relocation of details concerning testing not required for operability	2
ITS 3.7 LA4	5.4.3	"This minimum boron concentration ensures subcriticality under worst case design events," and references	UFSAR	10 CFR 50.59	Relocation of details concerning methodology for meeting requirements	2
ITS 3.7 LA5	3.12	Seismic shutdown	TRM	10 CFR 50.59	Relocation of descriptive actions and procedural detail associated with a seismic event	2
ITS 3.7 LA6	5.4.2.1	New Fuel Storage Rack secured location restrictions	UFSAR	10 CFR 50.59	Relocation of system description details	1

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 3.7 LA7	CTS 4.8.1 and 4.8.2	Requirements to test AFW pumps monthly	Inservice Testing Program	10 CFR 50.59	Relocation of details concerning testing not required for operability	2
ITS 3.7 LA8	CTS 4.12.3	Requirement to monitor relative humidity of air processed by spent fuel ventilation portion of the Refueling Filter System	TRM	10 CFR 50.59	Relocation of details concerning testing not required for operability	2
ITS 3.8 LA1	3.7.1.d	Description of specific automatic trips that are required to be bypassed for an operable Emergency Diesel Generator (EDG).	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of system description details	1
ITS 3.8 LA1	3.7.2.e and 4.6.1.3	Description of specific automatic trips that are required to be bypassed for an operable EDG. (As referenced to CTS 3.7.1.d)	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of system description details	1

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 3.8 LA2	3.7.3	Restriction allowing the back-feeding of the emergency busses via the unit auxiliary transformer only while the reactor is in cold shutdown unless nuclear safety considerations require it to be done during hot shutdown	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits	2
ITS 3.8 LA3	4.6.1.3	Details describing how the testing of the EDG automatic trips "trips defeat" feature is accomplished	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning testing methodology	2
ITS 3.8 LA4	4.6.1.3	"Each diesel generator shall be inspected at least once every refueling interval."	UFSAR and TRM	10 CFR 50.59	Relocation of details concerning testing methodology	2
ITS 3.8 LA5	4.6.1.4.a	Details describing the continuous load limits of the EDGs and restriction preventing the continuous operation of the EDGs above these limits	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning testing methodolgy	2

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 3.8 LA5	4.6.1.4.b	Details describing the short-term load limitations of the EDGs and restriction preventing the operation above this limit	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning testing methodolgy	2
ITS 3.8 LA5	4.6.1.5	Details describing how the EDG is started and synchronized to the bus in preparation for the 24 hour full load test	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning testing methodolgy	2
ITS 3.8 LA6	Table 4.1-2	Items No. 11 and 12 details of EDG fuel oil testing (tanks to which testing requirements apply)	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of descriptive details	1
ITS 3.8 LA7	4.6.3.2	Detail describing the precision at which the cell voltage must be determined and the requirement that the amount of water added to each cell be measured and recorded.	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning testing methodology	2

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 3.8 LA7	4.6.3.4	Requirement that when battery data is recorded, the new data shall be compared to previous data in order to detect signs of abuse or deterioration.	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning testing methodology	2
ITS 3.8 LA8	3.7.1.a and 3.7.1.c	Regarding 110 KU-4160 V startup transformer in service and 4160 V buses 2 and 3 energized.	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of system description details	1
ITS 3.8 LA9	3.7.1.b	Regarding 480 V buses E1 and 2 energized	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of system description details	1
ITS 3.8 LA10	3.7.1.e	Regarding details of the batteries and battery charger	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of system description details	1
ITS 3.9 LA1	3.8.1.f	Reference to specific boron concentration of 1950 ppm to be maintained during head removal or movement of fuel in the reactor	COLR	10 CFR 50.59	Relocation of values associated with requirements	2

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 3.9 LA2	Table 4.1-3 Item No. 6	Requirement to test refueling system interlocks prior to each refueling system shutdown	TRM	10 CFR 50.59	Relocation of details concerning testing not required for operability	4
ITS 3.9 LA3	3.10.8.3	"When the reactor is in the cold shutdown condition, the shutdown margin shall be a least 1 percent Δk/k."	COLR	10 CFR 50.59	Relocation of values associated with requirements	1
ITS 3.9 LA4	3.8.1.d	Requirement that whenever core geometry is being changed that the source range channels provide "continuous visual indication in the control room and one with audible indication available in the containment"	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning methodology for meeting requirements	4
ITS 3.9 LA6	3.8.1.e	Requirement that during refueling operations, T_{ave} shall be maintained ≤ 140° F	TRM	10 CFR 50.59	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits	2

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 3.9 LA7	3.8.1.h	"Movement of fuel within the core shall not be initiated prior to 100 hours after shutdown."	TRM	10 CFR 50.59	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits	2
ITS 3.9 R1	3.8.1.c	Requirement that during refueling operations "Radiation levels in the containment and spent fuel storage areas shall be monitored continuously."	TRM	10 CFR 50.59	Relocation, does not meet 10 CFR 50.36 criteria	
ITS 3.9 R1	3.8.1.g	Requirement that whenever core geometry is being changed, direct communications between the control room and the refueling cavity manipulator crane shall be available	TRM	10 CFR 50.59	Relocation, does not meet 10 CFR 50.36 criteria	3 4

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 4.0 LA1	5.1	Specifics describing the location of H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 in relation to HBRSEP Unit No. 1 and the fact that Unit No. 2 is owned and operated by Carolina Power & Light Co. In addition the statement describing site exclusion boundary (per 10 CFR 100.3) as being a circle of 1400 ft radius from the reactor center line.	UFSAR	10 CFR 50.59	Relocation of details concerning location of plant	1
ITS 4.0 LA2	5.3.1.1	Specifics describing the reactor core i.e. "approximately 68 metric tons", fuel rods "which are pre pressurized," and fuel assemblies each contain "204 fuel rod locations occupied by rods consisting of natural or slightly enriched uranium pellets, solid inert materials, or a combination of the aforementioned"	UFSAR	10 CFR 50.59	Relocation of system description details	1

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 4.0 LA2	5.3.1.3	Descriptive details of reload fuel	UFSAR	10 CFR 50.59	Relocation of system description details	1
ITS 4.0 LA2	5.3.2.1	Design code requirements of the RCS	UFSAR	10 CFR 50.59	Relocation of system description details	1
ITS 4.0 LA2	5.3.2.2	Descriptive information concerning the piping and components of the RCS meet American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (B&PV) Class I requirements	UFSAR	10 CFR 50.59	Relocation of system description details	1
ITS 4.0 LA2	5.3.2.3	Descriptive information concerning the nominal volume of coolant contained in the RCS at rated operating conditions	UFSAR	10 CFR 50.59	Relocation of system description details	1

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 4.0 LA3	5.4.1	"The new and spent fuel pit structures are designed to withstand the anticipated earthquake loadings as ASME B&PV Code Class I structures. The spent fuel pit has a stainless steel liner to ensure against loss of water."	UFSAR	10 CFR 50.59	Relocation of system description details	
ITS 4.0 LA3	5.4.2.1	Details describing features of the new fuel storage facilities that maintain K_{eff} <0.95 assuming the racks are flooded with pure water i.e., "...additional separation is maintained by use of the storage rack secured location restrictions"..."in order to establish a geometry which ensures that..."	UFSAR	10 CFR 50.59	Relocation of system description details	

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 4.0 LA3	5.4.2.2	Details describing features that maintain K_{eff} less than 0.95 in the spent fuel pool i.e., "a combination of nominal assembly spacing, neutron absorber material between the assemblies, and restrictions on fuel design, integral burnable absorber content, reconstitution, and storage is required to assure that..."	UFSAR	10 CFR 50.59	Relocation of system description details	1
ITS 4.0 LA4	5.2.1.1	Descriptive information concerning the purposes of the containment building	UFSAR	10 CFR 50.59	Relocation of system description details	1
ITS 4.0 LA4	5.2.1.2	Descriptive information concerning the design pressure ratings of the containment building	UFSAR	10 CFR 50.59	Relocation of system description details	1
ITS 4.0 LA4	5.2.2.1	Descriptive information concerning the design of the containment penetrations for electrical and mechanical systems	UFSAR	10 CFR 50.59	Relocation of system description details	1

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 4.0 LA4	5.2.2.2	Descriptive information concerning the Phase A and Phase B containment isolation signals and the fact that they must be capable of withstanding a single component failure and still maintain containment isolation	UFSAR	10 CFR 50.59	Relocation of system description details	1
ITS 4.0 LA4	5.2.3.1	Descriptive information concerning the containment spray system and its purpose	UFSAR	10 CFR 50.59	Relocation of system description details	1
ITS 4.0 LA4	5.2.3.2	Descriptive information concerning the containment internal air recirculation system and its heat removal capability	UFSAR	10 CFR 50.59	Relocation of system description details	1

TABLE RL - RELOCATED SPECIFIC-ITEM MATRIX

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 4.0 LA5	5.5	Descriptive information concerning the design of the containment building, auxiliary building, ASME B&PV Code Class I turbine bay, and all contained Engineered Safety Feature (ESF) systems be designed for a maximum credible earthquake with an acceleration of 0.20 g	UFSAR	10 CFR 50.59	Relocation of system description details	1
ITS 4.0 LA6	1.19	Definition of Site Boundary and Figure 1.1-1, "Plant Site Boundary and Exclusion Zone."	UFSAR	10 CFR 50.59	Relocation of details concerning location of plant	1
ITS 5.0 LA1	6.5.1.1.2	Requirements concerning how safety analysis shall be prepared for all procedures, tests, and experiments covering procedures identified in TS Section 6.5.1.1.1 and procedures that affect nuclear safety	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 5.0 LA1	6.5.1.1.3	Requirements concerning when a second safety review shall be performed on procedures affecting nuclear safety	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2
ITS 5.0 LA1	6.5.1.1.4	Requirements for approval of procedures that do not involve an unreviewed safety question as defined in 10 CFR 50.59 nor a change to the TS	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2
ITS 5.0 LA1	6.5.1.1.5	Requirements concerning approval of temporary changes to procedures and the maximum time it may be in effect i.e., 21 days	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2
ITS 5.0 LA1	6.5.1.1.6	Requirements concerning changes to procedures that constitute an unreviewed safety question, or involve a change to the TS	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 5.0 LA1	6.5.1.1.7	Requirements concerning changes which constitute a change to the facility as described in the UFSAR	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2
ITS 5.0 LA1	6.5.1.2.1	Requirements concerning plant modifications that affect nuclear safety	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2
ITS 5.0 LA1	6.5.1.2.2	Requirement concerning the second safety review on all modifications that affect nuclear safety	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2
ITS 5.0 LA1	6.5.1.2.3	Requirements concerning approval of modifications that do not involve an unreviewed safety question or a change to the TS	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2
ITS 5.0 LA1	6.5.1.2.4 & 6.5.1.2.5	Requirements concerning approval of modifications that either constitute an unreviewed safety question or a change to the TS	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 5.0 LA1	6.5.1.3.1	"Each proposed Technical Specification or Operating License change shall be reviewed by the Plant Nuclear Safety Committee and submitted to the NRC for approval."	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2
ITS 5.0 LA1	6.5.1.4.1	Requirements concerning Technical Specification violations	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	3
ITS 5.0 LA1	6.5.1.5.1	Qualification requirements for Nuclear Safety Reviewers	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2
ITS 5.0 LA1	6.5.1.6.1.a and b	Requirements for establishing a Plant Nuclear Safety Committee (PNSC) and the advisory role it plays to the Plant General Manager	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2
ITS 5.0 LA1	6.5.1.6.2	Requirement for the composition of the PNSC	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2
ITS 5.0 LA1	6.5.1.6.3	Requirements for PNSC members and alternate members	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 5.0 LA1	6.5.1.6.4.a and b	Definition of "quorum" as it pertains to the PNSC. Also limits the number of alternates that may compose a quorum	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2
ITS 5.0 LA1	6.5.1.6.5	Minimum PNSC meeting requirements	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2
ITS 5.0 LA1	6.5.1.6.6.a-k	Listing of activities requiring PNSC involvement	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2
ITS 5.0 LA1	6.5.1.6.7	Required actions to be taken upon disagreement between the PNSC and actions contemplated by the Plant General Manager	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2
ITS 5.0 LA1	6.5.1.6.8	Requirement for maintaining minutes of PNSC meetings and their minimum content	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2
ITS 5.0 LA1	6.5.2.1	Description of the function of the Nuclear Assessment Section (NAS)	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 5.0 LA1	6.5.2.2.1	Qualifications of individuals for independent reviews in the NAS	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2
ITS 5.0 LA1	6.5.2.2.2	Qualifications of the Manager-Nuclear Assessment Section	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2
ITS 5.0 LA1	6.5.2.2.3	Qualifications of individuals performing independent safety reviews	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2
ITS 5.0 LA1	6.5.2.2.4	Actions to be taken when sufficient expertise does not exist within the NAS. Also allows an individual to be "competent" in more than one specialty	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2
ITS 5.0 LA1	6.5.2.2.5	Qualifications for individuals performing reviews of documents submitted under TS Section 6.5.2.3	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2
ITS 5.0 LA1	6.5.2.2.6	Requirements for independent safety reviews in NAS	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 5.0 LA1	6.5.2.2.7 procedures	Requirement that the NAS Independent Safety Review Program be conducted in accordance with written, approved procedures	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2
ITS 5.0 LA1	6.5.2.3 a-e	Listing of items in which the NAS shall perform reviews	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2
ITS 5.0 LA1	6.5.2.4	"Results of Nuclear Assessment Section independent safety reviews shall be documented and retained."	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2
ITS 5.0 LA2	6.2.1.e	Requirement that the health physics manager have access to the overall unit manager and the health physics technician's "stop work" authority	UFSAR	10 CFR 50.59	Relocation of administrative details	2

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 5.0 LA3	6.2.3.h	Restriction that minimum shift manning requirements cannot be used to justify adequate shift complement upon shift relief when a required member is not available for relief	UFSAR	10 CFR 50.59	Relocation of administrative details	2
ITS 5.0 LA4	6.5.1.1.1.j	Reference to Regulatory Guide 4.15, Dec. 1977 with regard to the Quality Assurance Program	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2
ITS 5.0 LA6	4.4.3.a-h	Requirement to perform leakage testing and inspections of the Post Accident Recirculation Heat Removal System and the applicable acceptance criteria. Additional requirement to perform repairs as necessary to maintain leakage within the stated criteria	TRM	10 CFR 50.59	Relocation of details concerning testing methodology	2
ITS 5.0 LA7	4.4.4.1	Requirement to inspect containment surveillance tendons	TRM	10 CFR 50.59	Relocation of details concerning testing methodology	3

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 5.0 LA7	4.4.4.3.a	Details describing analysis to be performed on Containment Surveillance Tendons	TRM	10 CFR 50.59	Relocation of details concerning testing methodology	3
ITS 5.0 LA8	4.2.3	Requirement to perform reactor coolant pump flywheel inspections	Inservice Inspection Program	10 CFR 50.59	Relocation of details concerning testing methodology	3
ITS 5.0 LA9	3.3.2.c	Requirement that the spent fuel building and containment building filter fans shall be shown to operate within ±10% of design flow	TRM	10 CFR 50.59	Relocation of details concerning testing methodology	3
ITS 5.0 LA9	4.15.d	Requirement that the control room filtration system be tested following any structural maintenance on the filter housings or following painting, fire, or chemical release in the Control Room envelope	TRM	10 CFR 50.59	Relocation of details associated with post maintenance testing to declare operability	3

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 5.0 LA9	4.15.f	Requirement that the Control Room filtration system be tested every 18 months	TRM	10 CFR 50.59	Relocation of details concerning testing methodology	3
ITS 5.0 LA9	4.15.g	Requirement that the Control Room filtration system HEPA filters be tested after complete or partial replacement and associated test conditions	TRM	10 CFR 50.59	Relocation of details associated with post maintenance testing to declare operability	3
ITS 5.0 LA9	4.15.h	Requirement that the Control Room filtration system charcoal filters be tested after each partial or complete replacement and associated test conditions	TRM	10 CFR 50.59	Relocation of details associated with post maintenance testing to declare operability	3
ITS 5.0 LA9	4.12	Refueling filter systems Applicability and Objective	TRM	10 CFR 50.59	Relocation of descriptive details	3
ITS 5.0 LA9	4.12.1	Requirement that the Refueling Filter System be demonstrated operable every operating cycle	TRM	10 CFR 50.59	Relocation of descriptive details	3

TABLE RL - RELOCATED SPECIFIC-ITEM MATRIX

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 5.0 LA9	4.12.2.a	Requirement that the Refueling Filter System be tested initially, and at least once per operating cycle prior to each refueling outage or after 720 hours of system operation whichever comes first	TRM	10 CFR 50.59	Relocation of details concerning testing methodology	3
ITS 5.0 LA9	4.12.2.b-e	Details concerning how the Refueling System filtration system is to be tested and what tests are to be performed	TRM	10 CFR 50.59	Relocation of details concerning testing methodology	3
ITS 5.0 LA10	3.16.2.1	Restriction on the quantity of radioactive material contained in the listed tanks shall be limited at all times	TRM	10 CFR 50.59	Relocation of details concerning methodology for meeting requirements	3

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 5.0 LA10	3.16.2.2	Requirement that when the quantity of radioactive material in any listed tank exceeds the limit, suspend all additions to the tank, and take actions to reduce the amount of radioactive material in the tank to within limits within 48 hours	TRM	10 CFR 50.59	Relocation of details concerning methodology for meeting requirements	3
ITS 5.0 LA10	3.16.2.3	Requirement that if the radioactive content of any of the listed tanks cannot be reduced to within limits within 48 hours then the NRC shall be notified in accordance with TS Section 6.6	TRM	10 CFR 50.59	Relocation of reporting requirements	3
ITS 5.0 LA10	3.16.2.1.f	Definition of "Temporary Tank" as it applies to TS Section	TRM	10 CFR 50.59	Relocation of descriptive details	3

TABLE RL - RELOCATED SPECIFIC ITEM MATRIX

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 5.0 LA10	3.16.4.1	Restrictions on hydrogen and oxygen content in the Waste Gas Decay Tanks	TRM	10 CFR 50.59	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits	3
ITS 5.0 LA10	3.16.4.1.a	Actions to be taken when oxygen or hydrogen concentration in the Waste Gas Decay Tanks exceeds limits	TRM	10 CFR 50.59	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits	3
ITS 5.0 LA10	3.16.4.1.b	Actions to be taken when oxygen and hydrogen concentration in the Waste Gas Decay Tanks exceeds limits	TRM	10 CFR 50.59	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits	3

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 5.0 LA10	3.16.4.2	Reporting requirements for oxygen and/or hydrogen being out of specification in the Waste Gas Decay Tank(s) for ≥ 48 hours	TRM	10 CFR 50.59	Relocation of reporting requirements	3
ITS 5.0 LA10	3.16.4.3	Reporting requirements for condition where actions required to be taken by TS do not result in returning the hydrogen or oxygen concentration in the Waste Gas Decay Tank(s) to ≤ 6% within 24 hours	TRM	10 CFR 50.59	Relocation of reporting requirements	3
ITS 5.0 LA10	3.16.5.1	Limitation on the amount of radioactive material that may be stored in any one Waste Gas Decay Tank shall be limited to ≤ 1.9 E+4 curies noble gas (considered as Xe-133)	TRM	10 CFR 50.59	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits	3

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 5.0 LA10	3.16.5.2	Requirement to suspend all additions to any Waste Gas Decay Tank that exceeds the limit in TS Section 3.16.5.1 and within 48 hours reduce the tank contents to within limits	TRM	10 CFR 50.59	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits	3
ITS 5.0 LA10	3.16.5.3	Reporting requirements if the Waste Gas Decay Tank contents are not reduced to within limits within the time period allowed by TS Section 3.16.5.2	TRM	10 CFR 50.59	Relocation of reporting requirements	3
ITS 5.0 LA10	4.20.2	Note specifying which tanks are to be included in limitations dictated by TS Section 4.20.2.1	TRM	Bases Control Program in ITS Section 5.5.14	Relocation of system description details	3
ITS 5.0 LA10	4.20.2.1	Requirement to verify the radioactive material content of tanks listed in TS Section 3.16.2.1 by sampling	TRM	10 CFR 50.59	Relocation of detailed testing requirements relating to systems not required for operability or to maintain required limits	3

TABLE RL - RELOCATED SPECIFIC ITEM MATRIX

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 5.0 LA10	4.20.4.1	Requirement to verify the hydrogen and oxygen concentration in the Waste Gas Decay Tanks to be within limits by monitoring contents with hydrogen and oxygen monitors or sampling	TRM	10 CFR 50.59	Relocation of detailed testing requirements relating to systems not required for operability or to maintain required limits	3
ITS 5.0 LA10	4.20.5.1	Requirement to sample the contents of the Waste Gas Decay Tanks every 24 hours when Reactor Coolant Activity is ≥ 100 uCi/ml	TRM	10 CFR 50.59	Relocation of detailed testing requirements relating to systems not required for operability or to maintain required limits	3
ITS 5.0 LA11	6.9.1.4,	Details of format of Monthly Operating Report	TRM	10 CFR 50.59	Relocation of reporting requirements	2
ITS 5.0 LA12	6.5.3.1	Requirement to perform certain types of assessments at a frequency not to exceed 24 months, by the NAS as listed in TS Sections 6.5.3.1 a-h	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	3

TABLE RL - RELOCATED SPECIFIC ITEM MATRIX

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 5.0 LA12	6.5.3.2	Requirement for the NAS to perform assessments in accordance with the Code of Federal Regulations specifically in the areas of Emergency Preparedness, Security, and Radiation Protection	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	3
ITS 5.0 LA12	6.5.4.1 & 6.5.4.2	Requirements for independent fire protection and loss prevention inspection and audit	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2
ITS 5.0 LA1	6.6.1.b) & 6.6.2.b)	Review requirements associated with reportable events	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2
ITS 5.0 LA13	6.9.1.1	Reporting requirements for plant startup and power escalation	TRM	10 CFR 50.59	Relocation of reporting requirements	2
ITS 5.0 LA14	6.9.1.3.7	Reporting and approval requirements for changes to the radioactive waste systems	ODCM	ODCM in ITS Section 5.5.1	Relocation of reporting requirements Relocation of administrative details	2

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 5.0 LA14	6.17.1.1	Reporting requirements for major changes to the radioactive liquid, gaseous, or solid waste treatment systems. Includes allowance that licensee may submit the required information as part of the next UFSAR Update	ODCM	ODCM in ITS Section 5.5.1	Relocation of reporting requirements	2
ITS 5.0 LA14	6.17.1.2	Major changes to radioactive waste process systems shall become effective upon review and approval by the PNSC	ODCM	ODCM in ITS Section 5.5.1	Relocation of administrative details	2
ITS 5.0 LA15	6.9.3.3.b	Listing of TS requirements applicable to each listed methodology as they pertain to determining core operating limits	COLR	10 CFR 50.59	Relocation of administrative details	2
ITS 5.0 LA16	6.9.3.2	Requirement to generate written reports for the listed special radiological effluent reports listed and submit to the NRC within 30 days of the occurrence or event	ODCM	10 CFR 50.59	Relocation of reporting requirements	2

TABLE RL - RELOCATED SPECIFIC ITEM MATRIX

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 5.0 LA17	1.15	Requirements for the Process Control Program (PCP) to assure compliance with 10 CFR 20, 10 CFR 17, and Federal and State regulations	TRM	10 CFR 50.59	Relocation of administrative details	2
ITS 5.0 LA17	6.15.1	Requirement that the PCP shall be approved by the NRC prior to implementation	TRM	10 CFR 50.59	Relocation of administrative details	2
ITS 5.0 LA17	6.15.2	Reporting and approval requirements for changes to the PCP	TRM	10 CFR 50.59	Relocation of reporting requirements Relocation of administrative details	2
ITS 5.0 LA18	6.4.1	Requirements for a requalification and replacement training program for the plant staff that shall meet the requirements of Sec. 5.5 of ANSI N18.1-1971 and 10 CFR 55, Appendix A	UFSAR	10 CFR 50.59	Relocation of administrative details	2
ITS 5.0 LA19	6.10.1.a-i	Listing of facility records that must be retained for at least five years	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 5.0 LA19	6.10.2.a-m	Listing of facility records that must be retained for the duration of the facility operating license	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details	2
ITS 5.0 LA20	6.11	Requirement that procedures for personnel radiation protection for the Radiation Protection Program be prepared consistent with the requirements of 10 CFR 20 and that they be approved, maintained, and adhered to for all operations involving personnel radiation exposure	UFSAR	10 CFR 50.59	Relocation of administrative details	2
ITS 5.0 LA21	6.1.1, 6.5.1.1.4, 6.5.1.2.3, 6.2.1(b), 6.2.3, 6.3.1, 6.16.2, 6.13.1, and 6.13.2, With respect to detailed plant organization titles	Detailed plant organization titles	UFSAR	10 CFR 50.59	Relocation of administrative details	2

TABLE RL - RELOCATED SPECIFIC-ITEM MATRIX

ITS & DOC Reference	CTS Reference	Description	General Location	Change Controls	Characterization	Characterization Type
ITS 5.0 LA22	6.9.1.2 6.9.1.2.3, and 6.9.1.3, With regard to reporting requirements for radiological effluents	Reporting requirements for radiological effluents	ODCM	10 CFR 50.59	Relocation of reporting requirements	2
ITS 5.0 LA23	6.9.3.3.a With regard to mathematical terms utilized in the COLR	Mathematical terms utilized in the COLR	COLR	10 CFR 50.59	Relocation of descriptive details	2

CTS	Description	General Location	Change Controls	Characterization
3.1.1.4.A	Requirement that when the RCS temperature is >200°F RCS vent paths from the reactor vessel head and pressurizer steam space shall be operable	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria
3.1.1.4.B	Requirement that when the RCS temperature is >200°F, valves RC-571 and 572 shall be closed with the allowance that the valves may be cycled periodically in order to depressurize the vent system should the system pressurize due to "root" valve leak-by	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria
3.1.1.4.C.1	"With the Reactor Vessel Head vent path inoperable, restore the vent path to operable status within 30 days or be in Hot Shutdown within 6 hours and Cold Shutdown within the following 30 hours."	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria
3.1.1.4.C.2	Reporting requirement that with the Pressurizer steam space vent inoperable, restore it to operable status within 30 days or prepare and submit a special report to the NRC within the following 14 days detailing the cause of the inoperability and the action being taken to restore operability	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria
3.1.6.1	"The concentration of oxygen in the reactor coolant shall not exceed 0.1 ppm when the reactor coolant temperature exceeds 250°F."	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria
3.1.6.2	"The concentration of chloride in the reactor coolant shall not exceed 0.15 ppm when the reactor coolant temperature exceeds 250°F."	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria

CTS	Description	General Location	Change Controls	Characterization
3.1.6.3	Requirement that if out of specification reactor coolant oxygen or chloride concentration cannot be restored to within specifications within 24 hours the unit shall be placed in the cold shutdown condition using normal operating procedures	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria
3.1.2.2	"The secondary side of the steam generator must not be pressurized above 200 psig if the temperature of the vessel is below 120°F."	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria
3.1.2.3	"The pressurizer shall neither exceed a maximum heatup rate of 100°F/hr nor a cooldown rate of 200°F/hr. The spray shall not be used if the temperature difference between the pressurizer and the spray fluid is greater than 320°F."	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria
3.5.2.1	Requirement that the equipment listed in TS Table 3.5-6 shall be operable with their alarm/trip setpoints set in accordance with the ODCM	ODCM	ODCM in ITS Section 5.5.1	Radiological Effluent Technical Specifications (RETS) relocation, does not meet 10 CFR 50.36 criteria
3.5.2.2	Requirement that with the channel setpoint less conservative than that required in TS Section 3.5.2.1, immediately suspend releases via the associated pathway and restore the channel setpoint to that required by the ODCM or declare the channel inoperable	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.5.2.3	"With less than the minimum number of radioactive liquid effluent monitoring instrumentation operable, take the action shown in Table 3.5-6."	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria

CTS	Description	General Location	Change Controls	Characterization
3.5.2.4	"The provisions of the Specification 3.0 are not applicable."	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.5.3.1	Requirement that the equipment listed in TS Table 3.5-7 shall be operable with their alarm/trip setpoints set in accordance with the ODCM	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.5.3.2	Requirement that with the channel setpoint less conservative than that required in TS Section 3.5.3.1, immediately suspend releases via the associated pathway and restore the channel setpoint to that required by the ODCM or declare the channel inoperable	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.5.3.3	"With less than the minimum number of radioactive gaseous effluent monitoring instrumentation operable, take the action shown in Table 3.5-6."	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.5.3.4	"The provisions of the Specification 3.0 are not applicable."	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria

CTS	Description	General Location	Change Controls	Characterization
Table 3.5-6	"Radioactive Liquid Effluent Monitoring Instrumentation," which lists those monitors required to monitor the various liquid radioactive release pathways and the required actions to be taken when the monitoring channel is inoperable. The table also provides the necessary compensatory action that must be taken if it is desired to maintain the release via the pathway with the associated monitor inoperable.	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
Table 3.5-7	"Radioactive Gaseous Effluent Monitoring Instrumentation," which lists those monitors required to monitor the various gaseous radioactive release pathways and the required actions to be taken when the monitoring channel is inoperable. The table also provides the necessary compensatory action that must be taken if it is desired to maintain the release via the pathway with the associated monitor inoperable.	ODCM TRM	ODCM in ITS Section 5.5.1 10 CFR 50.59 for TRM	RETS relocation, does not meet 10 CFR 50.36 criteria
3.8.3	Requirements for spent fuel rod water temperature	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria
3.8.4	Spent fuel cask handling crane requirements	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria

CTS	Description	General Location	Change Controls	Characterization
3.9.1.1	Requirement that the concentration of radioactive material in liquid effluents released at any time from the site to unrestricted areas shall be limited to the concentrations specified in 10 CFR 20, App. B, Table II, Column 2 for radionuclides other than dissolved or entrained noble gases. For dissolved or entrained noble gases, the concentration shall be limited to $2x10^{-4}$ uCi/ml total activity.	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.9.1.2	Requirement, with the concentration of liquid effluents in excess of that allowed by TS Section 3.9.1.1, without delay to restore the concentration to within limits and notify the NRC in accordance with TS Section 6.6.	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.9.1.3	Requirement that in the event the requirements of TS Section 3.9.1.2 cannot be met the unit shall be placed in the hot shutdown condition.	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.9.1.4	"The provisions of Specification 3.0 are not applicable."	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.9.2.1	Requirement that the dose commitment at all times to a member of the public from radioactive materials in liquid effluents released to unrestricted areas shall be limited as stated in (a) and (b)	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria

CTS	Description	General Location	Change Controls	Characterization
3.9.2.2	"With the calculated dose commitment from the release of radioactive materials in liquid effluents exceeding any of the limits prescribed by Specification 3.9.2.1 above, prepare and submit a report to the Commission in accordance with Specification 6.9.3.2."	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.9.3.1	Requirement that the dose rate at all times to a member of the public from radioactive materials in gaseous effluents released from the site boundary shall be limited as stated in (a) and (b)	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.9.3.2	"With the dose rate(s) exceeding the above limits, without delay decrease the release rate to within the above limits. In addition, a notification must be made to the Commission in accordance with Specification 6.6."	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.9.3.3	Requirement that in the event the requirements of TS Section 3.9.3.2 cannot be met the unit shall be placed in the hot shutdown condition	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.9.4.1	Requirement that the air dose commitment due to radionoble gases released in gaseous effluents to areas at and beyond the site boundary shall be limited as stated in (a) and (b)	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.9.4.2	Requirement that with the limits of TS Section 3.9.4.1 exceeded, prepare and submit a report to the NRC in accordance with TS Section 6.9.3.2	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria

CTS	Description	General Location	Change Controls	Characterization
3.9.5.1	Requirement that the dose to the public from I-131, I-133, tritium, and radioactive materials in particulate form, with half-lives greater than eight (8) days be limited in accordance with limits stated in (a) and (b)	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.9.5.2	Requirement that with the limits of TS Section 3.9.5.1 exceeded, prepare and submit a report to the NRC in accordance with TS Section 6.9.3.2	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.9.6.1	Requirement that the dose commitment to any member of the public, due to releases of licensed materials and radiation, from uranium fuel cycle sources shall be limited to ≤ 25 mrem to the total body or any organ except the thyroid, which shall be limited to ≤ 75 mrem over 12 consecutive months	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.9.6.2	Reporting and analysis requirements when any of the limits stated in TS Sections 3.9.2.1.a or b, 3.9.4.1.a or b, or 3.9.5.1.a or b are exceeded by a factor of 2	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.9.6.3	"The provisions of Specification 3.0 are not applicable."	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.11.1	"A minimum of 15 total accessible thimbles and at least 2 per quadrant sufficient movable in-core detectors shall be operable during recalibration of the excore symmetrical offset detection system."	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria

CTS	Description	General Location	Change Controls	Characterization
3.11.2	"Power shall be limited to 90% of rated power if recalibration requirements for the excore symmetrical offset detecuon system identified in Table 4.1-1 are not met."	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria
3.16.1.1	Requirement that the radioactive liquid waste system be utilized to minimize offsite doses due to releases of liquid radioactive effluents	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.16.1.2	Requirement that with liquid wastes being discharged without treatment while in excess of the limits in TS Section 3.16.1.1, prepare and submit a report to the NRC in accordance with TS Section 6.9.3.2.b	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.16.3.1	Requirement that the radioactive gaseous waste system be utilized to minimize offsite doses due to releases of liquid radioactive effluents	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.16.3.2	Requirement that with the gaseous waste treatment system inoperable and gaseous releases in excess of the limits in 3.16.3.1, prepare and submit a special TS Section report to the NRC in accordance with TS Section 6.9.3.2.b	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.16.6.1	"The Solid Radioactive System shall be used in accordance with a Process Control Program (PCP) to process wet radioactive waste to meet shipping and burial ground requirements."	TRM	10 CFR 50.59	RETS relocation, does not meet 10 CFR 50.36 criteria
3.16.6.2	"With the provisions of the PCP not satisfied, suspend shipments of defectively processed or defectively packaged solid radioactive waste from the site."	TRM	10 CFR 50.59	RETS relocation, does not meet 10 CFR 50.36 criteria

CTS	Description	General Location	Change Controls	Characterization
3.16.6.3	Requirement that if a test specimen fails to verify solidification, the solidification of the batch under test shall be suspended until such time as additional test specimens can be obtained, alternative solidification parameters can be determined in accordance with the PCP, and a subsequent test verifies solidification	TRM	10 CFR 50.59	RETS relocation, does not meet 10 CFR 50.36 criteria
3.17.1.1	"The Radiological Environmental Monitoring Program shall be conducted as specified in Table 3.17-1."	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.17.1.2	Actions to be taken when the Radiological Environmental Monitoring Program is not in accordance with TS Section 3.17-1	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.17.1.3	Actions to be taken when the level of radioactivity in plant effluents as indicated by environmental sampling is greater than the reporting levels of TS Table 3.17-2	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.17.1.4	Requirement to obtain replacement samples of milk and leafy vegetables when the sample locations specified in TS Table 3.17-1 cannot be obtained	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.17.1.5	"The provisions of Specification 3.0 are not applicable."	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria

CTS	Description	General Location	Change Controls	Characterization
3.17.1.6	Allowance for deviations from the required environmental sampling schedule	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.17.2.1	Requirement to perform a land use census and related content	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.17.2.2	Reporting requirement for land use census that identifies doses greater than the values currently being calculated in TS Section 4.10.4.1	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.17.2.3.a-c	Actions to be taken when the land use census identifies a location which yields an annual calculated dose or dose commitment of a specific pathway which is 20% greater than that at a current sampling location	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.17.3.1, 2, 3, and 4	Requirement for analyses supplied by U. S. Environmental Protection Agency (EPA) as a part of Interlaboratory Comparison Program	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
Table 3.17-1	Table and associated notation describing the Radiological Environmental Monitoring Program	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
Table 3.17-2	Table describing reporting levels for radioactivity concentrations in environmental samples	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria

CTS	Description	General Location	Change Controls	Characterization
Table 3.17-3	Table with maximum values for LLDs	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
Table 4.1-1, Item 45	Requirement for testing high point vents	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria
4.10.1.1	Sampling requirements for batch liquid releases	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
4.10.1.2	Analysis requirements for samples of batch liquid releases	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
4.10.1.3	Requirement that liquid batch samples be taken and analyzed in accordance with TS Table 4.10-1. Requirement that the concentrations at the point of release be within the limits of TS Section 3.9.1.1	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
4.10.2.1	Requirement for determining the dose rate due to radioactive materials in gaseous effluents to be within the limits of TS Section 3.9.3.1 by performing sampling and analysis in accordance with Table 4.10-2	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
4.10.3.1	"Cumulative dose commitments for the current calendar quarter and current calendar year shall be determined in accordance with the ODCM once per 31 days."	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria

CTS	Description	General Location	Change Controls	Characterization
4.10.4.1	Requirement to determine cumulative dose contributions for the current quarter and current calendar year for I-131, I-133, tritium, and radionuclides in particulate form with half lives greater than 8 days	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
4.10.5.1	Requirement to determine cumulative dose contributions from liquid and gaseous effluents in accordance with TS Sections 3.9.2.1, 3.9.4.1, and 3.9.5.1	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
4.10.5.2	Requirement to determine cumulative dose contributions from direct radiation from the reactor unit and from radwaste storage tanks as set forth in the applicability of TS Section 3.9.6.2	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
Table 4.10-1	Table and associated notation describing the Radioactive Liquid Waste Sampling and Analysis Program	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
Table 4.10-2	Table and associated notation describing the Radioactive Gaseous Waste Sampling and Analysis Program	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
4.16	Requirements for Radioactive Source Leakage Testing	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria
4.19.1.1	Requirement to perform radioactive liquid effluent monitoring instrumentation operability surveillances in accordance with TS Table 4.19-1	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria

CTS	Description	General Location	Change Controls	Characterization
4.19.2.1	Requirement to perform radioactive gaseous effluent monitoring instrumentation operability surveillances in accordance with TS Table 4.19-2	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
Table 4.19-1	Table and associated notation describing the radioactive liquid effluent monitoring instrumentation surveillance requirements	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
Table 4.19-2	Table and associated notation describing the radioactive gaseous effluent monitoring instrumentation surveillance requirements	ODCM TRM	ODCM in ITS Section 5.5.1 10 CFR 50.59 for TRM	RETS relocation, does not meet 10 CFR 50.36 criteria
4.20.1.1	Requirements to perform projected dose commitments at least every 31 days to ensure the requirements of TS Section 3.16.1.1 are satisfied when the Liquid Radwaste Treatment System is not used	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
4.20.3.1	Requirements to perform projected dose commitments for gaseous releases at least every 31 days to ensure the requirements of TS Section 3.16.3.1 are satisfied	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
4.20.6.1	"The PCP shall be used to verify the solidification of one representative test specimen from every tenth batch of wet radioactive waste."	TRM	10 CFR 50.59	RETS relocation, does not meet 10 CFR 50.36 criteria
4.20.6.2	Actions to be taken when a test specimen from a batch of waste fails to verify solidification	TRM	10 CFR 50.59	RETS relocation, does not meet 10 CFR 50.36 criteria

CTS	Description	General Location	Change Controls	Characterization
4.21.1.1	Requirement to collect environmental samples in accordance with TS Table 3.17-1 and analyze them in accordance with TS Tables 3.17-2 and 3.17-3	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
4.21.2.1	Specification of how the land use census shall be conducted	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
4.21.3.1	Requirement to perform analyses as part of the EPA Interlaboratory Comparison Program	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
TS Appendix B	"Radioactive Effluent Releases" requirement to report on a monthly basis the quantities of radioactive effluents released from the plant	ODCM	ODCM in ITS Section 5.5.1	Does not meet 10 CFR 50.36 criteria

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