



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

August 17, 1999

Mr. Douglas R. Gipson
Senior Vice President
Nuclear Generation
Detroit Edison Company
6400 North Dixie Highway
Newport, MI 48166

SUBJECT: FERMI 2 - TABLES FOR SECTIONS 3.6 AND 3.7 OF THE DRAFT SAFETY EVALUATION OF THE PROPOSED CONVERSION OF THE CURRENT TECHNICAL SPECIFICATIONS TO IMPROVED STANDARD TECHNICAL SPECIFICATIONS (TAC NO. MA1465)

Dear Mr. Gipson:

Enclosure 1 provides the tables for Sections 3.6 and 3.7 of the draft safety evaluation (SE) on your proposed conversion of the current Technical Specifications (CTS) for Fermi 2 to Improved Technical Specifications (ITS). These tables were withheld from our August 6, 1999, letter transmitting the draft SE pending completion of our review of those tables. The ITS are based on the CTS, on NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4" (STS), Revision 1, dated April 1995, and on guidance provided in the Commission's "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," published on July 22, 1993 (58 FR 39132).

The enclosed tables are based on the NRC staff's review of Detroit Edison Company's application dated April 3, 1998, as supplemented on September 28, October 19, and December 10, 1998, and January 8, January 26, February 24, March 30, April 8, April 30, May 7, June 2, June 24, June 30, July 7, July 13, July 26, and August 4, 1999. The supplemental letters provided clarifying information and responses to the staff's requests for additional information (RAIs) dated October 26, November 20, December 4, and December 22, 1998, and January 14, January 25, and February 11, 1999. Questions discussed during meetings with your staff are documented in meeting summaries dated July 14, August 20, August 27, September 21, October 26 (two separate summaries), November 20, and December 23, 1998, and January 26, February 10 (two separate summaries), April 14, April 16, and August 5, 1999.

We are sending you the enclosed tables so that you can review them with the rest of the draft SE, verify their accuracy, and prepare certified ITS for Fermi 2 to be submitted to the NRC for issuance in the ITS conversion amendment.

To facilitate issuance of the ITS conversion amendment in accordance with the schedule given in our letter to you dated June 29, 1999, you are requested to send us your comments on the draft SE by August 26, 1999, along with the certified ITS and the associated Bases. After reviewing your comments on the draft SE, we will incorporate changes in the SE, as appropriate, before issuing the certified ITS and the final SE in the conversion amendment.

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D.R. Gipson

- 2 -

August 17, 1999

Please feel free to contact me at (301) 415-2828 or Jack Foster of the Technical Specifications Branch at (301) 415-3647 if you have any questions.

Sincerely,

Original signed by:

Andrew J. Kugler, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-341

Enclosure: Tables for Sections 3.6 and 3.7

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August 17, 1999

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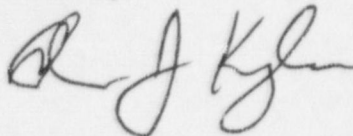
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D.R. Gipson

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Please feel free to contact me at (301) 415-2828 or Jack Foster of the Technical Specifications Branch at (301) 415-3647 if you have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "A. J. Kugler". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

Andrew J. Kugler, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-341

Enclosure: Tables for Sections 3.6 and 3.7

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Fermi 2

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Enclosure

Tables For
Sections 3.6 & 3.7

Table A - Administrative Changes to Current Technical Specifications is
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.6.1.1, Primary Containment			
3.6.1.1 A.1	Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications NUREG-1433, Rev. 1.	3.6.1.1	3/4.6.1.1 3/4.6.1.2 3/4.6.1.5 3/4.6.2.1
3.6.1.1 A.2	CTS 3.6.1.1 statement "Primary Containment Integrity shall be maintained" is replaced with "Primary containment shall be Operable." The change is editorial in that all CTS primary containment integrity requirements are specifically addressed in the ITS LCO for the primary containment along with the remainder of the LCOs in the Primary Containment Section (i.e., air locks, isolation valves, suppression pool, etc.).	LCO 3.6.1.1	3/4.6.1.1
3.6.1.1 A.3	CTS 4.6.1.1, 3.6.1.2 Action a, and CTS 3.6.1.5 contain details of leakage rate testing and structural integrity / visual inspection, which are being relocated to the Administrative Controls Section of the ITS. ITS SR 3.6.1.1 requires this same containment leakage rate testing and structural integrity / visual inspection (except as discussed elsewhere), but refers instead to a new Administrative Controls Program, Primary Containment Leakage Rate Testing Program (ITS 5.5.12), which contains the details of the requirements. This revised presentation is administrative only.	SR 3.6.1.1 5.5.12	4.6.1.1 3.6.1.2 Action a 3.6.1.5
3.6.1.1 A.4	CTS 3.6.1.1, footnote "*" to the Applicability, references CTS Special Test Exception 3.10.1. ITS LCO 3.0.7 adequately prescribes the use of the Special Operations LCOs and eliminates the need for this "cross reference." Elimination of this reference is an administrative change with no impact on safety.	LCO 3.0.7	3.6.1.1, footnote "*"

Table A - Administrative Changes to Current Technical Specification:
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.6.1.1 A.5	CTS SRs 4.6.1.1.c and 4.6.1.1.d provide direction to comply with other Specifications. ITS format does not include such "cross references." Compliance with other Specifications is required without it being stated here. Therefore, this change is an administrative change with no impact on safety.	None	4.6.1.1.c 4.6.1.1.d
3.6.1.1 A.6	CTS 4.6.2.1.e requires a visual examination of the suppression chamber after safety/relief valve operation when the suppression pool temperature is $\geq 160^{\circ}\text{F}$ and reactor coolant system pressure is >290 psig. Should this event occur, the required actions of ITS 3.6.1.1 are equivalent to those in CTS 3.6.2.1. ITS SR 3.6.1.1.3 is the new location for CTS 4.6.2.1.e.	SR 3.6.1.1.3	4.6.2.1.e
3.6.1.2, Primary Containment Air Lock			
3.6.1.2 A.1	Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications NUREG-1433, Rev. 1.	3.6.1.2	3/4 6.1.3
3.6.1.2 A.2	CTS 3.6.1.3, footnote "*" to the Applicability, references CTS Special Test Exception 3.10.1. ITS 3.0.7 adequately prescribes the use of the Special Operations LCOs and eliminates the need for this "cross reference." Elimination of this reference is an administrative change with no impact on safety.	LCO 3.0.7	3.6.1.3, footnote "**"
3.6.1.2 A.3	ITS 3.6.1.2, Actions Note 2 and Required Action C.1, and ITS SR 3.6.1.2.1, Notes 1 and 2, are added. This additional information facilitates the use and understanding of the intent of the requirements. These clarifications are consistent with CTS interpretation and practice.	LCO 3.6.1.2, Actions Note 2 and Required Action C.1 SR 3.6.1.2.1, Notes 1 and 2	NA

Table A - Administrative Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.6.1.2 A.4	In CTS 3.6.1.3, Action a.1 and Action b, the word "maintain" has been changed to "verify", and a 1 hour time added to complete this verification. This establishes consistency with ITS 3.6.1.2, Required Actions A.1 and C.2, which also provides consistency with the Primary Containment LCO Action. The intent of both the CTS and the ITS is consistent, therefore, this change is administrative with no impact on safety.	3.6.1.2 Required Actions A.1 and C.2	3.6.1.3, Action a.1 and Action b
3.6.1.2 A.5	The CTS Action 3.6.1.3.a.1 explicitly provides the option of restoring an inoperable air lock door to operable status. NUREG-1433 does not contain this action, but rather relies upon the guidance of ITS LCO 3.0.2 which allows the restoration of an LCO requirement within the time limits of the specified Required Actions. The CTS has been revised to delete this action since the option to restore compliance currently exists in the ITS.	LCO 3.0.2	3.6.1.3, Action a.1
3.6.1.2 A.6	The CTS Action 3.6.1.3.a.2 requirement that operation may continue with an inoperable airlock door until the next overall air lock leakage test, is not explicitly stated in ITS LCO 3.6.1.2 Actions. The performance of an overall airlock leakage test is required by 10 CFR 50, Appendix J, Option B. This requirement is embodied in ITS SR 3.6.1.2.1. The intent of the CTS limitation is based on the presumed inability to perform the overall airlock leakage test with an inoperable door. Since the required test could not be performed with an inoperable air lock door, and a plant shutdown would be required (based on entry into ITS Condition C and subsequent entry into Condition D), this restriction on continued operation need not be explicitly stated. Restoring the airlock door prior to the required overall air lock test is inherently required as a result of the required testing. Therefore, no change in operational requirements or intent is made. The proposed revision to eliminate a specific restriction on continued operation is an administrative change with no impact on safety.	None	3.6.1.3, Action a.2

Table A - Administrative Changes to Current Technical Specification
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.6.1.2 A.7	Note 1 to Required Actions A.1, A.2, and A.3 of ITS 3.6.1.2 states that "Required Actions A.1, A.2, and A.3 are not applicable if both doors in the same air lock are inoperable and Condition C is entered." The Note provides explicit instructions for proper application of the actions. In conjunction with ITS 1.3, "Completion Times," the Condition A Required Actions provide direction consistent with the intent of the CTS actions for one inoperable air lock door in the air lock. ITS 3.6.1.2, Required Action A.1 Note 1 recognizes that if both doors in the air lock are inoperable (Condition C is entered), then an "OPERABLE" door does not exist to be closed. Therefore, Required Actions A.1, A.2, and A.3, cannot be met. This change is an administrative change since it is consistent with the intent of the CTS and is only provided to ensure the Required Actions are correctly understood.	3.6.1.2 Note 1 to Required Actions A.1, A.2, and A.3	3.6.1.3 Actions
3.6.1.2 A.8	CTS 3.6.1.3, Action a.2, requires verification that the locked closed Operable airlock door remains closed every 31 days. ITS 3.6.1.2, Note to Required Action A.3, allows for administrative verification when the locked-closed door is in an area with limited access due to inerting, or high radiation area. These allowances constitute details of acceptable methods for complying with the CTS requirement for verification.	3.6.1.2, Note to Required Action A.3	3.6.1.3, Action a.2
3.6.1.2 A.9	CTS 4.6.1.3 contains details of leakage rate testing which are being relocated to the Administrative Controls Section of the ITS. ITS SR 3.6.1.2.1 requires this same containment leakage rate testing (except as discussed elsewhere), but refers instead to a new Administrative Controls Program, Primary Containment Leakage Rate Testing Program (ITS 5.5.12), which contains the details of the testing requirements. This revised presentation is administrative only.	SR 3.6.1.2.1 5.5.12	4.6.1.3

Table A - Administrative Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.6.1.3, Primary Containment Isolation Valves (PCIVs)			
3.6.1.3 A.1	Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications NUREG-1433, Rev. 1.	3.6.1.3	3/4.6.1.1 3/4.6.1.2 3/4.6.1.8 3/4.6.3 3/4.4.7
3.6.1.3 A.2	CTS 3.6.1.2.c refers to footnote “*” which is solely an informative note (informing that the requirement is associated with an exemption to Appendix J). The informational Note is not retained in ITS SR 3.6.1.3.12. This is a presentation preference, with no change in requirements or intent. Therefore, the change is administrative with no impact on safety.	None	3.6.1.2.c refers to footnote “*”
3.6.1.3 A.3	CTS 3.6.3 explicitly addresses all PCIVs, including an explicit requirement for reactor instrumentation line excess flow check valves (which are also PCIVs). However, CTS LCO 3.6.4.2 addresses all necessary requirements for the reactor building-to-suppression chamber vacuum breakers (which are also containment isolation valves), without reliance on the PCIV Specification. The intent and implementation of the CTS requirements is to exclude the reactor building-to-suppression chamber vacuum breakers from CTS 3.6.3, PCIVs. ITS LCO 3.6.1.3 provides a human factored improvement to explicitly exclude these vacuum breakers from the PCIV Specification. ITS also eliminates the redundant mention of excess flow check valves. Since all necessary requirements continue to be addressed, this presentation preference is considered an administrative change.	None	3.6.3 3.6.4.2

Table A - Administrative Changes to Current Technical Specification is
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.6.1.3 A.4	CTS 3.6.3, Actions a.1, b.1, and CTS 3.4.7, Action a.1.a) requires restoring inoperable isolation valve(s) as an option to isolating the affected penetration. ITS 3.6.1.3 Actions A and B do not contain the restoration action, but rather rely upon the guidance of LCO 3.0.2 which allows restoration within the time limits of the specified Required Actions. The CTS has been revised to delete this restoration action since the option to restore an inoperable component always exists, and is inherent in the ITS.	LCO 3.0.2	3.6.3, Actions a.1, and b.1 3.4.7, Action a.1.a)
3.6.1.3 A.5	Not Used		
3.6.1.3 A.6	CTS 3.6.3, Action b, contains an allowance, "the provisions of Specification 3.0.3 are not applicable." This allowance does not appear to serve any function; non-compliance with the specified Actions (which is the cause for entry into Specification 3.0.3) would require failure to shutdown the plant. It is acknowledged that the intent of failing to comply with a required shutdown would not be to also allow 3.0.3 to be not applicable. Given the existing interpretation that this "allowance" would never actually be effective, its deletion is considered administrative.	None	3.6.3, Action b
3.6.1.3 A.7	CTS 4.6.3.2 requires the performance of a system functional test of the primary containment automatic isolation valves, which includes the requirement for each automatic isolation valve to actuate on a "test signal." ITS SR 3.6.1.3.8 permits the system functional test to be initiated by an "actual or simulated" isolation signal. This change allows satisfactory automatic isolations to be used to fulfill the system functional Surveillance requirement. Operability is adequately demonstrated because the isolation valves can not discriminate between "actual" or "test" isolation signal. Since this is a reasonable interpretation of the existing requirement, this is an administrative change.	SR 3.6.1.3.8	4.6.3.2

**Table A - Administrative Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.6.1.3 A.8	ITS LCO 3.6.1.3 Actions are modified by Note 2, which provides clarification that, for the purpose of the associated LCO, "Separate Condition entry is allowed for each penetration flow path." This is acceptable because the Required Actions for each Condition provide appropriate compensatory actions for each inoperable PCIV. Complying with the Required Actions will allow for continued operation; subsequent inoperable PCIVs are governed by subsequent Condition entry and application of associated Required Actions. This is an administrative change with no impact on safety because the clarifications provided by Note 2 are consistent with the existing interpretation of the CTS.	3.6.1.3 Actions Note 2	3.6.3 Actions
3.6.1.3 A.9	ITS 3.6.1.3, Actions Notes 3 and 4 are added. These Notes facilitate the use and understanding of the ITS intent. Any system made inoperable by inoperable PCIVs is inoperable and its Actions also apply. This requirement is the existing interpreted intent of the CTS. Therefore, Note 3 explicitly clarifies this intent. Note 4 clarifies that these "systems" include the primary containment. With ITS LCO 3.0.6, these intents would not necessarily apply. Since the clarifications are consistent with the intent and interpretation of the CTS, this change is considered administrative with no impact on safety.	3.6.1.3 Actions Note 3 and 4	NA
3.6.1.3 A.10	CTS 3.6.3 Actions b.1 and b.2 detail specific methods of restoring inoperable EFCVs. Since the specific Operability criteria associated with EFCVs is that they actuate to restrict flow, (which is essentially a qualitative leakage rate requirement), EFCV are also included in ITS Action D for leakage not within limit. For simplicity in presentation, ITS 3.6.1.3 Action D combines the actions for all the various PCIV leakage rate failures into a single action to "restore leakage rates to within limits." This is equivalent to the CTS options to return to Operable status, or isolate the instrument line. As such, this change is considered administrative only.	3.6.1.3 Action D	3.6.3 Actions b.1 and b.2
3.6.1.3 A.11	Not Used		

Table A - Administrative Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.6.1.4, Primary Containment Pressure			
3.6.1.4 A.1	Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications NUREG-1433, Rev. 1.	3.6.1.4	3/4.6.1.6
3.6.1.4 A.2	CTS 3.6.1.5, identifies that drywell and suppression chamber internal pressure is maintained. ITS 3.6.1.4 defines the pressure as "primary containment" pressure. This is acceptable because in the ITS 3.6.1.4 Bases, primary containment pressure is defined as drywell and suppression chamber pressure. Therefore, this change does not change the intent of the CTS and is considered an administrative change with no impact on safety.	3.6.1.4	3.6.1.6
3.6.1.5, Drywell Air Temperature			
3.6.1.5 A.1	Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications NUREG-1433, Rev. 1.	3.6.1.5	3/4.6.1.7
3.6.1.6, Low-Low Set (LLS) Valves			
3.6.1.6 A.1	Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications NUREG-1433, Rev. 1.	3.6.1.6	3/4.4.2.2
3.6.1.6 A.2	CTS 4.4.2.2 requires a Logic System Functional Test (LSFT) of the Low-Low Set (LLS) System. The definition of LSFT is modified to not include the actuated device (refer to Description of Changes associated with Section 1.0). Overall, the revised presentation requires the same testing as the CTS, and is therefore considered administrative.	None	4.4.2.2

Table A - Administrative Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.6.1.6 A.3	CTS 4.4.2.2 requires the performance of a "simulated automatic" system test. ITS SR 3.6.1.6.2 permits the system functional test to be initiated by an "actual or simulated" automatic initiation signal. This change allows satisfactory automatic system initiations to be used to fulfill the system functional Surveillance requirement. Operability is adequately demonstrated because the LLS System can not discriminate between "actual" or "simulated" initiation signal. ITS SR 3.6.1.6.2 also includes a clarifying Note that "valve actuation may be excluded." Valve actuation is addressed by a separate Surveillance also required every 18 month. This is an administrative change with no impact on safety because it is a reasonable interpretation of the existing requirement.	SR 3.6.1.6.2	4.4.2.2
3.6.1.7, Reactor Building-to-Suppression Chamber Vacuum Breakers			
3.6.1.7 A.1	Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications NUREG-1433, Rev. 1.	3.6.1.7	3/4.6.4.2
3.6.1.7 A.2	CTS 3.6.4.2 details that reactor building-to-suppression chamber vacuum breakers are to be "Operable and closed." ITS LCO 3.6.1.7 simply requires Operability. Since Operability addresses the entire safety related function, and is adequately detailed in the Bases, elimination of the explicit statement to be closed (as a subset of Operable) is administrative, with no impact on safety.	None	3.6.4.2
3.6.1.7 A.3	Not Used		
3.6.1.7 A.4	Not Used		
3.6.1.7 A.5	Not Used		

Table A - Administrative Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.6.1.7 A.6	ITS LCO 3.6.1.7 Actions are modified by a Note, which provides clarification that, for the purpose of the associated LCO, "Separate Condition entry is allowed for each line." This is acceptable because the Required Actions for each Condition provide appropriate compensatory actions for each vacuum breaker line with an inoperable vacuum breaker. Complying with the Required Actions will allow for continued operation; subsequent inoperable vacuum breaker(s) in another line are governed by subsequent Condition entry and application of associated Required Actions. This is an administrative change with no impact on safety because the clarifications provided by the Note are consistent with the existing interpretation of the CTS.	3.6.1.7 Actions Note	NA
3.6.1.8, Suppression-Chamber-to-Drywell-Vacuum Breakers			
3.6.1.8 A.1	Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications NUREG-1433, Rev. 1.	3.6.1.8	3/4.6.4.1
3.6.1.8 A.2	CTS 3.6.4.1 details that the suppression chamber-to-drywell vacuum breakers are to be "closed and Operable." ITS LCO 3.6.1.8 simply requires Operability. Since Operability addresses the entire safety related function, and is adequately detailed in the Bases, elimination of the explicit statement to be closed (as a subset of Operable) is administrative, with no impact on safety.	None	3.6.4.1
3.6.1.8 A.3	Not Used		
3.6.1.9, Main Steam Isolation Valve (MSIV) Leakage Control System (LCS)			
3.6.1.9 A.1	Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications NUREG-1433, Rev. 1.	3.6.1.9	3/4.6.1.4

Table A - Administrative Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.6.2.1, Suppression Pool Average Temperature			
3.6.2.1 A.1	Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications NUREG-1433, Rev. 1.	3.6.2.1	3/4.6.2.1
3.6.2.1 A.2	CTS 3.6.2.1.a.2.b) details requirements for suppression pool water average temperature based on "THERMAL POWER less than or equal to 1% of RTP." ITS LCO 3.6.2.1 uses the clarified criteria more specifically with each temperature limit. CTS LCO 3.6.2.1 is only specific in associating the criteria with the 110°F limit. Also, CTS 3.6.2.1 Actions b, b.1, and b.2.a), present the requirement to shutdown as a complete shutdown to Mode 4, even though the associated 95°F limit only applies > 1% RTP. ITS Action B more clearly states the actual requirement by requiring the shutdown to ≤ 1% RTP. At ≤ 1% RTP, the Applicability of the 95°F limit is exited, and therefore the required Actions can be exited (although if > 110°F, other Required Actions would continue to apply).	LCO 3.6.2.1	3.6.2.1.a.2.b
3.6.2.1 A.3	CTS 3.6.2.1 LCO statement leads in with "the suppression chamber shall be OPERABLE" and goes on to state specific requirements to be met, which constitute that Operability. ITS LCO 3.6.2.1 presents the specific requirements for suppression chamber water temperature (and ITS 3.6.2.2 presents requirements for level), without stating a general requirement for Operability. This is a presentation preference only, with no change in intent. As such, this change is considered administrative.	None	3.6.2.1
3.6.2.2, Suppression Pool Water Level			
3.6.2.2 A.1	Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications NUREG-1433, Rev. 1.	3.6.2.2	3/4.5.3 3/4.6.2.1

Table A - Administrative Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.6.2.3, Residual Heat Removal (RHR) Suppression Pool Cooling			
3.6.2.3 A.1	Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications NUREG-1433, Rev. 1.	3.6.2.3	3/4.6.2.3
3.6.2.3 A.2	Not Used		
3.6.2.3 A.3	CTS 4.6.2.3.a requires verification every 31 days that a manual, power operated or automatic valve in the suppression pool cooling flow path that is not locked, sealed or otherwise secured in position, is in its correct position. The lineup for ECCS Operability requires the RHR System in a lineup other than that necessary to perform the suppression pool cooling function. In addition, the suppression pool cooling function is manually actuated (requiring reposition of valves and starting of the RHR pump by the operator). In the CTS, this is recognized and interpreted that "in the correct position" allows the valves to be in a non-accident position provided they can be realigned to the correct position. In ITS, the words "in the correct position" mean that the valves must be in the accident position, unless they can be automatically aligned on an accident signal. If so, then they can be in the non-accident position. Therefore, for the Suppression Pool Cooling System and other manually actuated systems, the additional words "or can be aligned to the correct position" have been added to clarify that it is permissible for valves to be in the non-accident position and the system still be considered Operable. This is an administrative change with no impact on safety because it is consistent with a reasonable interpretation of the existing requirements.	SR 3.6.2.3.1	4.6.2.3.a
3.6.2.4, Residual Heat Removal (RHR) Suppression Pool Spray			
3.6.2.4 A.1	Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications NUREG-1433, Rev. 1.	3.6.2.4	3/4.6.2.2

Table A - Administrative Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.6.2.4 A.2	Not Used		
3.6.2.4 A.3	CTS 4.6.2.2.a requires verification every 31 days that a manual, power operated or automatic valve in the suppression pool spray flow path that is not locked, sealed or otherwise secured in position, is in its correct position. The lineup for ECCS Operability requires the RHR System in a lineup other than that necessary to perform the suppression pool spray function. In addition, the suppression pool spray function is manually actuated (requiring reposition of valves and starting of the RHR pump by the operator). In the CTS, this is recognized and interpreted that "in the correct position" allows the valves to be in a non-accident position provided they can be realigned to the correct position. In ITS, the words "in the correct position" mean that the valves must be in the accident position, unless they can be automatically aligned on an accident signal. If so, then they can be in the non-accident position. Therefore, for the Suppression Pool Spray System and other manually actuated systems, the additional words "or can be aligned to the correct position" have been added to clarify that it is permissible for valves to be in the non-accident position and the system still be considered Operable. This is an administrative change with no impact on safety because it is consistent with a reasonable interpretation of the existing requirements.	SR 3.6.2.4.1	4.6.2.2.a
3.6.3.1, Primary Containment Hydrogen Recombiners			
3.6.3.1 A.1	Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications NUREG-1433, Rev. 1.	3.6.3.1	3/4.6.6.1
3.6.3.1 A.2	CTS 4.6.6.1.c provides direction to measure the system leakage rate as a part of the overall integrated leakage rate test required by Specification 3.6.1.2. ITS format does not include "cross references."	None	4.6.6.1.c

Table A - Administrative Changes to Current Technical Specifications as
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.6.3.2, Primary Containment Oxygen Concentration			
3.6.3.2 A.1	Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications NUREG-1433, Rev. 1.	3.6.3.2	3/4.6.6.2
3.6.3.2 A.2	The CTS 3.6.6.2 Applicability and CTS 3.6.6.2 Actions for failing to meet the LCO are not consistent. CTS Actions require, that if oxygen concentration is not restored, be in at least Startup within the next 8 hours. Since CTS 3.6.6.2 Applicability is greater than 15% RTP, per CTS 3.0.1, the plant is only required to reduce power to less than 15%. ITS 3.6.3.2 Actions only require a reduction to 15% RTP. Below 15%, RTP, the Applicability is exited and the Actions are no longer required (in accordance with CTS and ITS LCO 3.0.1 and LCO 3.0.2). Since the change is consistent with the CTS, in that CTS 3.0.1 allows actions to be suspended at 15% RTP, the change is considered administrative with no impact on safety.	3.6.3.2 Action B	3.6.6.2 Applicability 3.6.6.2 Action
3.6.3.2 A.3	CTS 4.6.6.2 requirement to verify that the drywell and suppression chamber are within the oxygen concentration limit within "24 hours after Thermal Power is greater than 15% RTP," is redundant and is not retained in ITS 3.6.3.2. Since "24 hours after Thermal Power is greater than 15% RTP" reflect the actual Applicability of this Specification, CTS 4.0.4 and ITS SR 3.0.4 already require this surveillance to be performed prior to entering the Applicability of an LCO. Therefore, the requirement to verify oxygen concentration is within limits within 24 hours, does not need to be repeated as a separate Surveillance Frequency.	None	4.6.6.2
3.6.3.2 A.4	CTS 3.6.6.2, identifies drywell and suppression chamber oxygen concentration. ITS 3.6.3.2 defines the concentration as "primary containment" oxygen concentration. This is acceptable because in the ITS 3.6.3.2 Bases, primary containment oxygen concentration is defined as drywell and suppression chamber oxygen concentration. Therefore, this change does not change the intent of the CTS and is considered an administrative change with no impact on safety.	3.6.3.2	3.6.6.2

**Table A - Administrative Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.6.4.1, Secondary Containment			
3.6.4.1 A.1	Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications NUREG-1433, Rev. 1.	3.6.4.1	3/4.6.5.1
3.6.4.2, Secondary Containment Isolation Valves (SCIVs)			
3.6.4.2 A.1	Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications NUREG-1433, Rev. 1.	3.6.4.2	3/4.6.5.1 3/4.6.5.2
3.6.4.2 A.2	ITS LCO 3.6.4.2 Actions are modified by Note 2, which provides clarification that, for the purpose of the associated LCO, "Separate Condition entry is allowed for each penetration flow path." This is acceptable because the Required Actions for each Condition provide appropriate compensatory actions for each inoperable SCIV and is consistent with the existing interpretation of CTS.	3.6.4.2 Actions Note 2	3.6.5.2 Actions
3.6.4.2 A.3	ITS 3.6.4.2, Actions Note 3 is added. This Note facilitates the use and understanding of the ITS intent. Any system made inoperable by inoperable SCIVs is inoperable and its Actions also apply. This requirement is the existing interpreted intent of the CTS.	3.6.4.2 Actions Note 3	NA
3.6.4.2 A.4	CTS 3.6.5.2, Action a, requires restoring inoperable damper(s) as an option to isolating the affected penetration. ITS 3.6.4.2 Actions A and B do not contain the restoration action, but rather rely upon the guidance of LCO 3.0.2 which allows restoration within the time limits of the specified Required Actions. The CTS has been revised to delete this restoration action since the option to restore an inoperable component always exists, and is inherent in the ITS.	LCO 3.0.2	3.6.5.2, Action a

Table A - Administrative Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.6.4.2 A.5	CTS 4.6.5.2.b requires the performance of a system functional test of the secondary containment automatic isolation dampers, which includes the requirement for each automatic isolation damper to actuate on a "test signal." ITS SR 3.6.4.2.3 permits the system functional to be initiated by an "actual or simulated" isolation signal. This change allows satisfactory automatic isolations to be used to fulfill the system functional Surveillance requirement.	SR 3.6.4.2.3	4.6.5.2.b
3.6.4.2 A.6	CTS 4.6.5.1.b.3 requires verification that the isolated penetration remains closed every 31 days. ITS 3.6.4.2, Note 1 to Required Action A.2 and Note 1 to SR 3.6.4.2.1, allows for administrative verification when the isolation device is in an area with limited access due to high radiation. These allowances constitute details of acceptable methods of complying with the CTS requirement.	3.6.4.2, Note 1 to Required Action A.2 SR 3.6.4.2.1, Note 1	4.6.5.1.b.3
3.6.4.3, Standby Gas Treatment (SGT) System			
3.6.4.3 A.1	Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications NUREG-1433, Rev. 1.	3.6.4.3	3/4.6.5.3
3.6.4.3 A.2	A new Action is added which directs entry into ITS LCO 3.0.3 if both SGT subsystems are inoperable in Modes 1, 2 or 3 (ITS LCO 3.6.4.3 Condition D). This avoids confusion as to the proper Action, if in Modes 1, 2 or 3 and simultaneously in a special condition such as handling irradiated fuel in the secondary containment. Since this Action results in the same Action as intended in the CTS, this change is considered administrative.	3.6.4.3 Required Action C.1	3.6.5.3 Actions
3.6.4.3 A.3	The Surveillance Requirement CTS 4.6.5.3.a for the heaters is revised from "OPERABLE" to operating. It is necessary for the heaters to actually operate (cycle properly between operating and standby when required) to reduce moisture from the adsorbers and HEPA filters. No change in actual operating practice is intended. Therefore, this change is considered administrative.	SR 3.6.4.3.1	4.6.5.3.a

Table A - Administrative Changes to Current Technical Specifications as
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.6.4.3 A.4	CTS 4.6.5.3.d.2 requires the performance of a system functional test by a "simulated" signal. ITS SR 3.6.4.3.3 permits the system functional test to be initiated by an "actual or simulated" automatic initiation signal. This change allows satisfactory automatic SGT System actuations for other than Surveillance purposes to be used to fulfill the Surveillance Requirement. Operability is adequately demonstrated because the SGT System cannot discriminate between "actual" or "simulated" signals. This is an administrative change with no impact on safety because it is a reasonable interpretation of the existing requirements.	SR 3.6.4.3.3	4.6.5.3.d.2

Table A - Administrative Changes to Current Technical Specifications
ITS Section 3.7, Plant Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.7.1, Residual Heat Removal Service Water (RHRSW) System			
3.7.1 A.1	Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications NUREG-1433, Rev. 1.	3.7.1	3/4.7.1.1
3.7.1 A.2	CTS 3.7.1.1 footnote "**", is deleted in ITS 3.7.1. The CTS footnote provides unnecessary duplication of the Actions required by ITS 3.4.8, "RHR Shutdown Cooling System - Hot Shutdown," contains no additional restrictions on the operation of the plant, and could be interpreted as a relaxation of the requirements to achieve Mode 4 (Cold Shutdown). The ITS 3.4.8 Action to be in Mode 4 within 36 hours adequately prescribes the requirement to make efforts to "maintain reactor coolant temperature as low as practical." If conditions are such that Mode 4 cannot be attained, the Actions remain in effect, requiring that efforts to reach Mode 4 continue. Elimination of the footnote is an administrative change with no impact on safety.	N/A	3.7.1.1 footnote "**"
3.7.1 A.3	CTS 3.7.1.1 LCO, Applicability, Action b, and Action c require the RHRSW System to be Operable in non-operating Modes and require RHR-SDC be declared inoperable when RHRSW is inoperable. ITS 3.7.1 only requires that the RHRSW System be Operable in Modes 1, 2, and 3. This is acceptable because in Modes 4 and 5 the RHRSW System is a support system for RHR-SDC. The ITS definition of Operability of RHR-SDC will require the Operability of the appropriate support systems, including RHRSW components needed for RHR to perform its function. Therefore, these requirements are adequately defined in the ITS definition of Operability and the explicit requirements are not necessary. The CTS Actions for inoperability of these systems in these shutdown Modes, each direct that the supported equipment be declared inoperable and the applicable Actions for the inoperable supported systems be taken. These CTS Actions are consistent with allowing application of the definition of Operability to apply. Therefore, this change introduces no technical change, and is considered administrative.	N/A	3.7.1.1 LCO, Applicability, Action b, and Action c

Table A - Administrative Changes to Current Technical Specifications
ITS Section 3.7, Plant Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.7.1 A.4	CTS 4.7.1.1 requires a monthly RHRSW System valve lineup to "verify each valve ... is in its correct position." ITS clarifies this requirement by adding "or can be aligned to the correct position." Since RHRSW is a manually actuated and operated system, "correct position" can be misleading. The intent of "correct" is to allow for certain manual valve realignments that may be required on manual initiation, to be acceptable configurations for standby Operability. This intent is supported by the NUREG-1433 clarifying wording. Therefore this clarification is considered administrative only.	SR 3.7.1.1	4.7.1.1
3.7.2, EECW / EESW System and UHS			
3.7.2 A.1	Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications NUREG-1433, Rev. 1.	3.7.2	3/4.7.1.2, 3/4.7.1.3, 3/4.7.1.5, 3/4.8.2
3.7.2 A.2	CTS 3.7.1.2, 3.7.1.3, and 3.7.1.5, Mode 4 and 5 and "handling irradiated fuel in the secondary containment" Applicability requirements for Operability of the EECW System, EESW System, and the UHS respectively, are removed. For these shutdown Modes the ITS allows the definition of Operability of the supported systems to dictate EECW, EESW and UHS requirements. The definition of Operability will provide sufficient assurance that the systems supported by EECW/EESW/UHS can perform their required support function. The CTS Actions for inoperability of these systems in these shutdown Modes, each direct that the supported equipment be declared inoperable and the applicable Actions for the inoperable supported systems be taken. These CTS Actions are consistent with allowing application of the definition of Operability to apply. Therefore, this change introduces no technical change, and is considered administrative.	N/A	3.7.1.2, 3.7.1.3, and 3.7.1.5

Table A - Administrative Changes to Current Technical Specifications
ITS Section 3.7, Plant Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.7.2 A.3	CTS 3.7.1.3 requirements for EESW are separated from CTS 3.7.1.2 requirements for EECW. However, the Actions for EESW inoperability simply direct that EECW be declared inoperable and the Actions of CTS 3.7.1.2 be taken. The ITS formats these requirements within a single Specification for EECW and EESW (and UHS). Any inoperability of the collective cooling system(s) results in the Actions for ITS 3.7.2 being taken. These Actions are consistent with the CTS Actions for EECW (except as otherwise noted, e.g., Discussion of Change (DOC) A.2) and EESW. Therefore, the presentation of EESW requirements within a single Specification with the EECW requirements is an administrative change only.	3.7.2	3.7.1.3
3.7.2 A.4	CTS 3.7.1.2, Action a.2 for an inoperable EECW subsystem and CTS 3.7.1.5, Action d for one UHS reservoir inoperable, "cascade" actions to respective support system Specifications. ITS provides specific Actions within ITS 3.7.2 for these inoperabilities, without requiring actions of the associated inoperable support system Specifications (this in accordance with ITS 3.0.6). In reformatting the Actions in this manner, the ITS presents Actions that are consistent with the limiting Actions invoked by the CTS requirement to cascade actions. Any exceptions are addressed separately in DOC L.1 for this specification.	3.7.2	3.7.1.2, Action a.2 3.7.1.5, Action d
3.7.2 A.5	CTS 3.7.1.5, Actions a and b, simply transfer actions to other Actions within this CTS Specification. ITS presentation does not utilize this format. There are no technical changes associated with eliminating these CTS Actions, and therefore, the change is administrative.	N/A	3.7.1.5, Actions a and b
3.7.2 A.6	CTS 4.7.1.2.b requires the performance of a system functional test for the EECW System on an "actuation test signal." ITS SR 3.7.2.5 permits the system functional to be initiated by an "actual or simulated" signal. This change allows satisfactory automatic system initiations to be used to fulfill the system functional Surveillance requirement. Operability is adequately demonstrated because the EECW Systems can not discriminate between "actual" or "test" initiation signals. This is an administrative change with no impact on safety because it is a reasonable interpretation of the existing requirement.	SR 3.7.2.5	4.7.1.2.b

Table A - Administrative Changes to Current Technical Specifications
ITS Section 3.7, Plant Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.7.2 A.7	CTS 4.7.1.2.a requires a monthly EECW System valve lineup "verifying each valve ... is in its correct position." ITS clarifies this requirement by adding a Note to SR 3.7.2.4, stating that "Isolation of EECW flow to individual components does not render EECW System inoperable." Since individually cooled supported systems may be isolated for various reasons, and that supported system declared inoperable, "correct position" of valves supplying cooling flow to that system can be misleading. The CTS intent of "correct" is to allow for certain valve realignments (e.g., isolated) that may be required to individual systems, to be acceptable configurations for EECW Operability. This is an administrative change with no impact on safety because it is a reasonable interpretation of the existing requirements.	Note to SR 3.7.2.4	4.7.1.2.a
3.7.3, Control Room Emergency Filtration (CREF) System			
3.7.3 A.1	Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications NUREG-1433, Rev. 1.	3.7.3	3/4.7.2
3.7.3 A.2	CTS 3.7.2, Applicability and Action c, are revised to exclude Modes 4 and 5 if no activities involving Core Alterations, OPDRVs, or handling irradiated fuel are being conducted which may lead to a need for control room isolation. These changes are made to agree with CTS 3.7.2, Action c, which allows indefinite unrestricted operation in Modes 4 and 5 provided Core Alterations, OPDRVs, and irradiated fuel handling are suspended. The revised presentation continues to implement the identical limitations, with no technical change.	N/A	3.7.2, Applicability and Action c

Table A - Administrative Changes to Current Technical Specifications
ITS Section 3.7, Plant Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.7.3 A.3	CTS 3.7.2 Action b.1 (required shutdown when the CREF flow path and/or redundant subsystems are inoperable) is modified by footnote #. This footnote allows a 6 hour delay in commencing the shutdown when the inoperability is the result of "Surveillance Requirement 4.7.2.1.c due to painting, fire, or chemical release in any ventilation zone communicating with the system or to perform Surveillance Requirement 4.7.2.1.d." The CTS exception addresses all circumstances that require collection of a charcoal sample. Since this collection necessarily requires that the flow path be made inoperable, the exception precludes routine intentional entry into an immediate shutdown statement (ITS revises this to a required LCO 3.0.3 entry). The ITS simplifies the statement of this exception in the Note to ITS SR 3.7.3.2, without any change in intent. This revised presentation is editorial presentation preference with no technical change, and in therefore administrative.	ITS SR 3.7.3.2 Note	3.7.2 Action b.1, Footnote "#"
3.7.3 A.4	The Surveillance Requirement CTS 4.7.2.1.b.2 for the heaters is revised from Operable to operating. It is necessary for the heaters to actually operate (cycle properly between operating and standby when required) to reduce moisture from the adsorbers and HEPA filters. No change in actual operating practice is intended. Therefore, this change is considered administrative.	SR 3.7.3.1	4.7.2.1.b.2
3.7.3 A.5	CTS 4.7.2.1.e.2 requires the performance of a system functional test by a "actuation test signal." ITS SR 3.7.3.4 permits the system functional test to be initiated by an "actual or simulated" automatic initiation signal. This change allows satisfactory automatic CREF system actuations for other than Surveillance purposes to be used to fulfill the Surveillance Requirement. Operability is adequately demonstrated because the CREF system cannot discriminate between "actual" or "test" signals. This is an administrative change with no impact on safety because it is a reasonable interpretation of the existing requirements.	SR 3.7.3.4	4.7.2.1.e.2

**Table A - Administrative Changes to Current Technical Specification :
ITS Section 3.7, Plant Systems**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.7.3 A.6	CTS 3.7.2 Action c.2 provides specific actions for when the CREF system becomes inoperable (due to loss of charcoal efficiency, to replace the charcoal, or to perform Control Room duct leakage testing during handling fuel in secondary containment) during Core Alterations and during operations with a potential of draining the reactor vessel. The CTS Action c.2 requirements are the same actions as would be required by CTS Action c.3 except that suspension of Core Alterations and handling of fuel inside secondary containment is not required under Action c.2. The ITS implements these requirements together in Action C by adding a note to the Required Actions for suspending Core Alterations and handling fuel in secondary containment to not require these Required Actions in the situations covered by CTS Action c.2. The resulting requirements are thus unchanged from CTS to ITS. This presentational preference has no affect on safety.	Action C - Note to the Required Actions	3.7.2 Action c.2
3.7.3 A.7	CTS 4.7.2.1.h contains two footnotes to provide guidance on test protocol acceptability and a one-time interval extension to allow for implementation of the test requirement. The need for these allowances has passed and they are therefore not included in the ITS. Since this change eliminates provisions that have expired it is an administrative change with no impact on safety.	N/A	4.7.2.1.h
3.7.4, Control Center Air Conditioning (AC) System			
3.7.4 A.1	Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications NUREG-1433, Rev. 1.	3.7.4	3/4.7.2

Table A - Administrative Changes to Current Technical Specifications
ITS Section 3.7, Plant Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.7.4 A.2	CTS 3.7.2 Applicability and Action c. are revised to exclude Modes 4 and 5 if no activities (i.e., Core Alterations, OPDRVs, or handling irradiated fuel) are being conducted which may lead to a need for control room isolation. These changes are made to agree with CTS 3.7.2, Action c, which allows indefinite unrestricted operation in Modes 4 and 5 provided Core Alterations, OPDRVs, and irradiated fuel handling are suspended. The revised presentation continues to implement the identical limitations, with no technical change.	3.7.4 Applicability	3.7.2 Applicability and Action c.
3.7.4 A.3	In the ITS, LCO 3.0.3 was revised to: "LCO 3.0.3 is only applicable in Modes 1, 2 and 3." This administrative change allows all Fermi CTS exceptions to LCO 3.0.3 for Specifications whose Applicability is other than Modes 1, 2 or 3, to be encompassed by ITS LCO 3.0.3. CTS 3.0.3 is not applicable in Modes 4 and 5. Therefore, it is not applicable during core alterations (only possible in Mode 5) and OPDRVs (only possible in Modes 4 and 5). CTS 3.7.2, Action d also provides an exception to 3.0.3 when irradiated fuel is being handled in secondary containment. In ITS 3.7.4, the Note in Actions C and E states that 3.0.3 is not applicable and this would apply to core alterations, OPDRVs, and when irradiated fuel is being handled in secondary containment. Therefore, the change is a presentation preference only with no technical change.	3.7.4, Note to Actions C and E	3.7.2 Action d
3.7.5, Main Condenser Offgas			
3.7.5 A.1	Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications NUREG-1433, Rev. 1.	3.7.5	3.11.2.7

Table A - Administrative Changes to Current Technical Specifications
ITS Section 3.7, Plant Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.7.5 A.2	ITS 3.7.5 Required Actions B.2, B.3.1 and B.3.2 provide conditions and Actions associated with steam jet air ejectors (SJAЕ) isolation or optional shutdown which are not explicitly stated in the CTS. Also added to the Applicability for Modes 2 and 3 is the condition "with any main steam line not isolated," which recognizes that with the main steam lines isolated, no potential release path exists. Although not identified in CTS 3.11.2.7, these conditions meet the intent of the CTS 3.11.2.7 footnote "*" for SJAЕ in operation and implicit allowance to exit the CTS Applicability. ITS 3.7.5 Required Action B.2 allows for the isolation of the SJAЕs or be in MODE 3 in 12 hours and MODE 4 in 36 hours to satisfy the conditions. Although CTS 3.11.2.7 Actions do not specifically allow the isolation of the SJAЕs taking these Actions results in exiting the CTS 3.11.2.7 Applicability and therefore, is an existing option. Since the changes are consistent with the intent of the CTS, these changes are administrative with no impact on safety.	3.7.5 Applicability and Actions B.2, B.3.1, and B.3.2	3.11.2.7 footnote "**"
3.7.5 A.3	CTS 3.11.2.7 Action requirements are to "be in at least Startup" in conjunction with the requirement to close MSIVs. ITS does not explicitly include this step. By design, the unit must be in at least Mode 2 (Startup) to close the MSIVs, or a reactor scram will ensue. Therefore, elimination of this explicit step in the process of closing the MSIVs will not result in a technical change.	N/A	3.11.2.7 Action
3.7.6, Main Turbine Bypass System			
3.7.6 A.1	Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications NUREG-1433, Rev. 1.	3.7.6	3/4.7.9 3/4.2.3
3.7.6 A.2	CTS 3.7.9 Applicability requirement "...OPERATIONAL CONDITION 1 when..." is removed and not included in the Applicability of ITS 3.7.6 since, with Thermal Power $\geq 25\%$ RTP, the unit will always be in Mode 1. Therefore, it is unnecessary to state this requirement in the Applicability. Since the change is consistent with the intent of the CTS, this change is administrative with no impact on safety.	N/A	3.7.9 Applicability

Table A - Administrative Changes to Current Technical Specifications
ITS Section 3.7, Plant Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.7.6 A.3	CTS 3.7.9 requires that MCPR Actions be applied within one hour when the Main Turbine Bypass System is inoperable, with the MCPR actions of CTS 3.2.3 requiring that the operating MCPR is determined to be within the MCPR limit within an additional hour. Together this provides a total of two hours to restore compliance with bypass valve-related MCPR limits. This is consistent with ITS 3.7.6, which also allows 2 hours to apply the MCPR limit with an inoperable Main Turbine Bypass System.	3.7.6 Action A	3.7.9 Action 3.2.3 Action b
3.7.6 A.4	CTS 3.2.3, Action b, allows an unrestricted "operation may continue" when MCPR limits for inoperable bypass valves are applied when the bypass valve(s) are inoperable. ITS LCO 3.7.6 implements this CTS action by stating this option as part of the LCO statement. The effect is identical to the CTS action; therefore, the change is an administrative presentation preference only.	3.7.6 LCO	3.2.3, Action b
3.7.7, Spent Fuel Storage Pool Water Level			
3.7.7 A.1	Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications NUREG-1433, Rev. 1.	3.7.7	3.9.9

Table A - Administrative Changes to Current Technical Specifications
ITS Section 3.7, Plant Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.7.7 A.2	CTS 3.9.9 is applicable whenever irradiated fuel assemblies are in the spent fuel storage pool, and its Actions require suspending all fuel movements (both irradiated as well as non-irradiated fuel moves). The relocation of non-irradiated fuel movements (as well as crane operations) is addressed separately in Discussion of Change "LA.1". After this relocation (justified by LA.1), the CTS Action only requires suspension of fuel movement. Based on this, ITS 3.7.7 Applicability is limited to circumstances when irradiated fuel assemblies are being moved in the spent fuel storage pool. Therefore, since the intent of CTS 3.9.9 (after changes justified by LA.1) is maintained, this is an administrative change with no impact on safety. In addition, the bounding design basis fuel handling accident assumes an irradiated fuel assembly is dropped onto an array of irradiated fuel assemblies seated within the RPV. Once the fuel movement has been suspended, as required by the CTS Action and ITS 3.7.7 Required Action A.1, a fuel handling accident, whether over the RPV or the spent fuel storage pool, cannot occur.	3.7.7	3.9.9
3.7.8, EDGSW System			
3.7.8 A.1	Editorial change, reformatting, and revised numbering are adopted to make the ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications NUREG-1433, Rev. 1.	3.7.8	3.7.1.4
3.7.8 A.2	CTS 3.7.1.4 Action, in addition to requiring that the associated EDG be declared inoperable, explicitly requires "take the Action required by [the EDG Specifications]." ITS 3.7.8 Action does not retain the explicit direction to cascade to the EDG Specification Actions since LCO 3.0.6 adequately addresses this requirement in the event an ITS Actions requires declaring a system inoperable. This is consistent with CTS requirements.	N/A	3.7.1.4 Action

Table L - Less Restrictive Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.1.1, Primary Containment				
3.6.1.1 L.1	CTS 4.6.2.1.h requires obtaining NRC review and approval of subsequent test schedules following any failure of a drywell-to-suppression chamber bypass leak test. ITS does not retain the requirement for this request, but does retain the explicit requirement for increased testing (every 9 months) if two tests fail.	None	4.6.2.1.h	Unique
3.6.1.2, Primary Containment Air Lock				
3.6.1.2 L.1	ITS 3.6.1.2, Actions Note 1, is added to allow entry through a closed or locked air lock door for the purpose of making repairs. If the outer door is inoperable, then it may be easily accessed for repair. If the inner door is the one that is inoperable, however, this change allows entry through the Operable outer door, which means there is a short time during which the primary containment boundary is not intact (during access through the outer door). This proposed allowance will have strict administrative controls, which are detailed in the Bases.	3.6.1.2 Actions Note 1	3.6.1.3 Actions	G
3.6.1.2 L.2	CTS actions for an inoperable primary containment airlock door do not contain provisions for entering containment if access would require opening the Operable door that is otherwise required to be closed to comply with the required actions. ITS 3.6.1.2 Required Action A.1 Note 2, is added to allow entry through a closed and/or locked Operable air lock door (for reasons other than repairs) for a limited period of time (i.e., 7 days).	3.6.1.2 Required Action A.1 Note 2	3.6.1.3 Actions	G

Less Restrictive Change Categories

A (L.A.x) Relocation of Details	F Surveillance Frequency Extensions / Allowances For Delay Due To Plant Conditions
B (L.B.x) Elimination of Details	G Relaxation in Actions & Avoidance of Plant Shutdowns
C (L.C.x) AOT / STI Revisions Supported by NRC Approved Topicals	H Relaxation in Surveillance Acceptance Criteria
D Applicability Changes (relaxations)	I Relaxation in LCO Requirements
E AOT Extensions	J Relaxation in Mode Change Restrictions (LCO / SR 3.0.4 Relaxations)
	R (L.R.x) Elimination of Details Not In Regulatory Controlled Locations

Table L - Less Restrictive Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.1.2 L.3	CTS actions for the primary containment air lock do not provide separate and specific actions for inoperable air lock door interlock mechanisms. This results in applying the shutdown requirements of CTS Action 3.6.1.3.b in the event of an inoperable interlock mechanism. ITS LCO 3.6.1.2 Action B is added to address a situation where the air lock interlock mechanism is inoperable.	3.6.1.2 Action B	3.6.1.3 Action b	G
3.6.1.2 L.4	CTS 4.6.1.3.d requires testing the airlock interlock, such that only one door can be opened at a time, every 6 months. ITS SR 3.6.1.2.2 extends this frequency to once per 24 months.	SR 3.6.1.2.2	4.6.1.3.d	F
3.6.1.3, Primary Containment Isolation Valves (PCIVs)				
3.6.1.3 L.R.1	CTS SR 4.6.3.1 requires a demonstration of operability after maintenance or repair on an isolation valve. The change removes this explicit requirement from Technical Specifications. Verifying proper Operability, including stroke time, of these valves after maintenance on these valves is normal maintenance and operating practice. In addition, the requirement to verify the correct stroke time of these valves per the IST Program is required by ITS SR 3.6.1.3.5. Consequently, Operability of these valves is specifically required, and periodically verified. Therefore, removal of the requirement to verify operability of the valve after maintenance is considered acceptable.	None	SR 4.6.3.1	R
3.6.1.3 L.R.2	Not Used			
3.6.1.3 L.R.3	Not Used			

Less Restrictive Change Categories

A	(L.A.x) Relocation of Details	F	Surveillance Frequency Extensions / Allowances For Delay Due To Plant Conditions
B	(L.B.x) Elimination of Surveillances "prior to an activity" When Periodic Surveillance Suffices	G	Relaxation in Actions & Avoidance of Plant Shutdowns
C	(L.C.x) AOT / STI Revisions Supported by NRC Approved Topicals	H	Relaxation in Surveillance Acceptance Criteria
D	Applicability Changes (relaxations)	I	Relaxation in LCO Requirements
E	AOT Extensions	J	Relaxation in Mode Change Restrictions (LCO / SR 3.0.4 Relaxations)
		R	(L.R.x) Elimination of Details Not In Regulatory Controlled Locations

Table L - Less Restrictive Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.1.3 L.R.4	Not Used			
3.6.1.3 L.1	CTS 3.6.1.8 and 4.6.1.3.1, time limits on opening primary containment purge valves while aligned to SGTS, are replaced with specific criteria for opening. In conjunction with this, the surveillance frequency to monitor compliance is revised from "before being opened" to a nominal 31 days (which is typical of other valve lineup SRs). These criteria are also applied to the 1-inch valves (as a more restrictive change discussed here for completeness). The time limits were based on engineering judgment and/or early plant operating experience, and not based on any analytical requirements. ITS 3.6.1.3 limits on when the valves are permitted to be open are provided in the Note to SR 3.6.1.3.1.	SR 3.6.1.3.1	3.6.1.8 4.6.1.8.1	H, I
3.6.1.3 L.2	CTS 3.6.1.8 and CTS 3.6.3 Actions for inoperable containment isolation valves, and CTS 3.4.7 Actions for inoperable MSIVs, which require maintaining one isolation valve OPERABLE, would not be met in the event both valves in a penetration are inoperable. In this event, an immediate shutdown (per CTS 3.0.3 for 3.6.1.8, CTS 3.6.3 Action a, or CTS 3.4.7 Action a.2, "otherwise ...") is required. ITS 3.6.1.3, Action B provides 1 hour for restoration, prior to commencing a required shutdown.	3.6.1.3, Action B	3.6.1.8 3.6.3 Actions	G
3.6.1.3 L.3	CTS 3.6.3 Action b allows only 4 hours to restore EFCVs to Operable status or to isolate the associated instrument line flow path. Furthermore, CTS 3.6.3 Actions result in an immediate shutdown for penetrations that have a single PCIV that is inoperable. ITS extends the restoration time for these single valve penetrations to either 4 or 72 hours.	3.6.1.3 Actions A and D	3.6.3 Action b	G
3.6.1.3 L.4	Not Used			

Less Restrictive Change Categories

A (L.A.x) Relocation of Details	F	Surveillance Frequency Extensions / Allowances For Delay Due To Plant Conditions
B (L.B.x) Elimination of Surveillances "prior to an activity" When Periodic Surveillance Suffices	G	Relaxation in Actions & Avoidance of Plant Shutdowns
C (L.C.x) AOT / STI Revisions Supported by NRC Approved Topicals	H	Relaxation in Surveillance Acceptance Criteria
D Applicability Changes (relaxations)	I	Relaxation in LCO Requirements
E AOT Extensions	J	Relaxation in Mode Change Restrictions (LCO / SR 3.2.4 Relaxations) (L.R.x) Elimination of Details Not In Regulatory Controlled Locations

Table L - Less Restrictive Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.1.3 L.5	Not Used			
3.6.1.3 L.6	CTS 4.6.1.1.b, and 4.6.1.1.b.1, require periodic verification that the isolated penetration remains closed. ITS 3.6.1.3, Notes 1 and 2 to Required Actions A.2 and C.2, and Note 1 to SRs 3.6.1.3.2 and 3, allow for administrative verification when the isolation device is in an area with limited access due to high radiation or is locked, sealed, or otherwise secured in the closed position.	3.6.1.3, Notes 1 and 2 to Required Actions A.2 and C.2, Note 1 to SRs 3.6.1.3.2 and 3,	4.6.1.1.b 4.6.1.1.b.1	H
3.6.1.3 L.7	CTS 4.6.1.8.2 requires leak testing the purge valves with resilient seals once per 92 days. ITS SR 3.6.1.3.6 requires this testing every 184 days, with the added limitation of "once within 92 days after opening the valve."	SR 3.6.1.3.6	4.6.1.8.2	F
3.6.1.3 L.8	CTS 4.6.1.1.b requires the periodic verification of the closed status of non-automatic PCIVs. If this requirement can not be met, the Actions of 3.6.1.1 require restoration in 1 hour prior to commencing a shutdown. ITS 3.6.1.3 provides these SRs as part of the PCIV specification, and results in restoration times of from 4 to 72 hours prior to commencing a shutdown.	3.6.1.3 Actions A and C	3.6.1.1 Actions 4.6.1.1.b	E
3.6.1.3 L.9	CTS 4.6.3.4 requires testing to verify that each EFCV "checks flow." ITS SR 3.6.1.3.9 requires verification that each EFCV "restricts flow."	SR 3.6.1.3.9	4.6.3.4	H

Less Restrictive Change Categories

A	(L.A.x) Relocation of Details	F	Surveillance Frequency Extensions / Allowances For Delay Due To Plant Conditions
B	(L.B.x) Elimination of Surveillances "prior to an activity" When Periodic Surveillance Suffices	G	Relaxation in Actions & Avoidance of Plant Shutdowns
C	(L.C.x) AOT / STI Revisions Supported by NRC Approved Topicals	H	Relaxation in Surveillance Acceptance Criteria
D	Applicability Changes (relaxations)	I	Relaxation in LCO Requirements
E	AOT Extensions	J	Relaxation in Mode Change Restrictions (LCO / SR 3.0.4 Relaxations)
		R	(L.R.x) Elimination of Details Not In Regulatory Controlled Locations

Table L - Less Restrictive Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.1.3 L.10	CTS 3.6.3, Action a.3, explicitly lists some, but not all, possible acceptable isolation devices that may be used to satisfy isolating a penetration with an inoperable isolation valve. Many penetrations are designed with check valves as acceptable isolation barriers. With forward flow in the line secured, a check valve is essentially equivalent to a closed manual valve. Therefore, the action has been modified to provide a more explicit list of acceptable isolation devices, which includes a check valve with flow secured.	3.6.1.3 Required Action A.1	3.6.3, Action a.3	G
3.6.1.3 L.11	CTS 4.6.1.1.b and 3.6.3 Action a.3 contain a requirement for a manual valve (which is closed to isolate a penetration) to be locked. CTS 3.4.7 Action a.1.b) requires use of a deactivated MSIV, which, in the case of the third MSIV, is a type of "locked" manual valve. With a penetration closed using a manual valve, a passive barrier is established, i.e., one not subject to a single active failure. ITS 3.6.1.3 Actions, ITS SR 3.6.1.3.2, and SR 3.6.1.3.3 do not detail the locking (or deactivating) of manual valves used to isolate penetrations.	3.6.1.3 Actions SR 3.6.1.3.2 SR 3.6.1.3.3	4.6.1.1.b 3.6.3 Action a.3 CTS 3.4.7 Action a.1.b)	G, H
3.6.1.3 L.12	Not Used			
3.6.1.3 L.13	CTS 3.6.1.8 and 3.4.7 require purge valve penetrations and MSIV penetrations, respectively, to be isolated in the event an associated PCIV is inoperable. Similarly, CTS 3.6.3 provides requirements for PCIVs, but includes an allowance to "reopen on an intermittent basis under administrative control" any penetrations isolated to comply with the Actions. CTS 3.6.1.8 and 3.4.7 do not explicitly contain this allowance. Consistent with the CTS 3.6.3 allowance, this explicit allowance is provided in ITS 3.6.1 Actions Note 1, through which it also applies to the purge valves and the MSIVs.	3.6.1.3 Actions Note 1	3.6.1.8 Actions 3.4.7 Actions	G

Less Restrictive Change Categories

A (LA x) Relocation of Details	F	Surveillance Frequency Extensions / Allowances For Delay Due To Plant Conditions
B (LB x) Elimination of Surveillances "prior to an activity" When Periodic Surveillance Suffices	G	Relaxation in Actions & Avoidance of Plant Shutdowns
C (LC x) AOT / STI Revisions Supported by NRC Approved Topicals	H	Relaxation in Surveillance Acceptance Criteria
D Applicability Changes (relaxations)	I	Relaxation in LCO Requirements
E AOT Extensions	J	Relaxation in Mode Change Restrictions (LCO / SR 3.0.4 Relaxations)
	R	(LR x) Elimination of Details Not In Regulatory Controlled Locations

Table L - Less Restrictive Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.1.4, Primary Containment Pressure				
None				
3.6.1.5, Drywell Air Temperature				
None				
3.6.1.6, Low-Low Set (LLS) Valves				
3.6.1.6 L.1	CTS 4.4.2.2 requires an LSFT every 18 months of the LLS System, which per the CTS definition requires including the actuated device, i.e., opening the LLS valve. ITS SR 3.6.1.6.1 Note provides an allowance to defer this testing beyond the 18 month requirement until 12 hours after reactor steam pressure and flow are adequate to perform the test.	SR 3.6.1.6.1 Note	4.4.2.2	F
3.6.1.7, Reactor Building-to-Suppression Chamber Vacuum Breakers				
3.6.1.7 L.1	CTS 4.6.4.2 requires each vacuum breaker be verified closed every 7 days. ITS SR 3.6.1.7.1 requires this verification every 14 days.	SR 3.6.1.7.1	4.6.4.2	F

Less Restrictive Change Categories

A (L.A.x) Relocation of Details	F	Surveillance Frequency Extensions / Allowances For Delay Due To Plant Conditions
B (L.B.x) Elimination of Surveillances "prior to an activity" When Periodic Surveillance Suffices	G	Relaxation in Actions & Avoidance of Plant Shutdowns
C (L.C.x) AOT / STI Revisions Supported by NRC Approved Topicals	H	Relaxation in Surveillance Acceptance Criteria
D Applicability Changes (relaxations)	I	Relaxation in LCO Requirements
E AOT Extensions	J	Relaxation in Mode Change Restrictions (LCO / SR 3.0.4 Relaxations)
	R	(L.R.x) Elimination of Details Not In Regulatory Controlled Locations

Table L - Less Restrictive Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.1.7 L.2	CTS 4.6.4.2.a requires that the vacuum breakers be closed at all times; with no explicit allowance to be open when performing their intended function (i.e., when relieving vacuum), and no allowance for opening during performance of required Surveillances. ITS SR 3.6.1.7.1 has two Notes; Note 1 stating that the vacuum breakers can be opened when performing required Surveillances, and Note 2 stating that vacuum breakers can be open when performing their intended function.	SR 3.6.1.7.1	4.6.4.2.a	H
3.6.1.7 L.3	CTS 3.6.4.2 provides action only for one inoperable vacuum relief line. ITS LCO 3.6.1.7 Actions are modified by a Note that provides clarification that, for the purpose of the associated LCO, "Separate condition entry is allowed for each line." This is acceptable because the Required Actions for each Condition provide appropriate compensatory actions for each vacuum breaker line with an inoperable vacuum breaker. Complying with the Required Actions will allow for continued operation; subsequent inoperable vacuum breaker(s) in another line are governed by subsequent Condition entry and application of the associated Required Actions.	3.6.1.7 Actions Note	3.6.4.2 Actions	G

Less Restrictive Change Categories

- A (LA.x) Relocation of Details
- B (LB.x) Elimination of Surveillances "prior to an activity" When Periodic Surveillance Suffices
- C (LC.x) AOT / STI Revisions Supported by NRC Approved Topicals
- D Applicability Changes (relaxations)
- E AOT Extensions

F
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J
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Surveillance Frequency Extensions / Allowances For Delay Due To Plant Conditions
Relaxation in Actions & Avoidance of Plant Shutdowns
Relaxation in Surveillance Acceptance Criteria
Relaxation in LCO Requirements
Relaxation in Mode Change Restrictions (LCO / SR 3.0.4 Relaxations)
(LR.x) Elimination of Details Not In Regulatory Controlled Locations

Table L - Less Restrictive Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.1.8, Suppression-Chamber-to Drywell-Vacuum Breakers				
3.6.1.8 L.1	CTS 4.6.4.1.a requires that the vacuum breakers be closed at all times; with no explicit allowance to be open when performing their intended function (i.e., when relieving vacuum), and no allowance for opening during performance of required Surveillances (e.g., functional testing of the vacuum breakers); however, these periods of opening reflect periods clearly within the intent of considering the vacuum breaker capable of performing their intended function and therefore being considered operable. ITS SR 3.6.1.8.1 has two Notes; Note 1 stating that the vacuum breakers can be opened when performing required Surveillances, and Note 2 stating that vacuum breakers can be open when performing their intended function.	SR 3.6.1.8.1	4.6.4.1.a	H
3.6.1.9, Main Steam Isolation Valve (MSIV) Leakage Control System (LCS)				
3.6.1.9 L.1	ITS 3.6.1.9 Action B is added for the condition of both MSIV LCS subsystems inoperable. A period of 7 days is proposed to restore at least one of the MSIV LCS subsystems to Operable status before requiring a shutdown.	3.6.1.9 Action B	3.0.3 3.6.1.4 Actions	G
3.6.2.1, Suppression Pool Average Temperature				
3.6.2.1 LR.1	CTS 3.6.2.1, Action b.2, requires operation of "at least one residual heat removal loop in the suppression pool cooling mode" when suppression pool average temperature exceeds 110°F. The requirement is not required to remain in the Technical Specifications for suppression pool temperature, because this activity must be coordinated with other operator actions that may be required when suppression pool average temperature exceeds 110°F.	None	3.6.2.1, Action b.2	R

Less Restrictive Change Categories

A	(L.A.x) Relocation of Details	F	Surveillance Frequency Extensions / Allowances For Delay Due To Plant Conditions
B	(L.B.x) Elimination of Surveillances "prior to an activity" When Periodic Surveillance Suffices	G	Relaxation in Actions & Avoidance of Plant Shutdowns
C	(L.C.x) AOT / STI Revisions Supported by NRC Approved Topicals	H	Relaxation in Surveillance Acceptance Criteria
D	Applicability Changes (relaxations)	I	Relaxation in LCO Requirements
E	AOT Extensions	J	Relaxation in Mode Change Restrictions (LCO / SR 3.0.4 Relaxations)
		R	(L.R.x) Elimination of Details Not In Regulatory Controlled Locations

Table L - Less Restrictive Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.2.1 L.1	CTS 4.6.2.1.c requires verification at least once per 30 minutes that suppression chamber average water temperature is $\leq 120^{\circ}\text{F}$ following a scram when suppression chamber average water temperature is $\geq 95^{\circ}\text{F}$. ITS 3.6.2.1, Required Action D.2, requires this verification every 30 minutes only if suppression pool temperature is $> 110^{\circ}\text{F}$.	3.6.2.1, Required Action D.2	4.6.2.1.c	E, F
3.6.2.1 L.2	Not Used			
3.6.2.1 L.3	CTS 3.6.2.1 a.2 and a.3 present requirements inconsistent with the intended limitations on suppression chamber water temperature. CTS 3.6.2.1 a.2 limits the temperature to $\leq 95^{\circ}\text{F}$ only when in Mode 1 or 2 with thermal power $> 1\%$ RTP; allowing a 110°F limit when $\leq 1\%$ RTP. CTS 3.6.2.1 a.3 imposes a 95°F limit during Mode 3 (which is always $\leq 1\%$ RTP), and does not allow the post-scram exception for a 120°F limit when an MSIV is open. Therefore, the CTS only allow the 110°F limit during the brief period in Mode 2, but $\leq 1\%$ RTP. ITS 3.6.2.1 allows the 110°F limit at all times $\leq 1\%$ RTP.	3.6.2.1	3.6.2.1 a.2 and a.3	G, I
3.6.2.2, Suppression Pool Water Level				
3.6.2.2 L.1	CTS 3.6.2.1, Action a, and CTS 3.5.3, Action a, both require that when suppression pool water level is not within required limits when in Modes 1, 2, and 3 that it must be restored "within 1 hour" or the reactor must be shutdown within the following 12 hours. Under the same conditions, ITS 3.6.2.2, Required Action A.1, allows 2 hours to restore suppression pool water level to within limits or the reactor must be shutdown within the following 12 hours.	3.6.2.2, Required Action A.1	3.6.2.1, Action a, 3.5.3, Action a	E

Less Restrictive Change Categories

A (LA.x) Relocation of Details	F	Surveillance Frequency Extensions / Allowances For Delay Due To Plant Conditions
B (LB.x) Elimination of Surveillances "prior to an activity" When Periodic Surveillance Suffices	G	Relaxation in Actions & Avoidance of Plant Shutdowns
C (LC.x) AOT / STI Revisions Supported by NRC Approved Topicals	H	Relaxation in Surveillance Acceptance Criteria
D Applicability Changes (relaxations)	I	Relaxation in LCO Requirements
E AOT Extensions	J	Relaxation in Mode Change Restrictions (LCO / SR 3.0.4 Relaxations)
	R	{LR.x} Elimination of Details Not In Regulatory Controlled Locations

Table L - Less Restrictive Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.2.3, Residual Heat Removal (RHR) Suppression Pool Cooling				
3.6.2.3 L.1	CTS 3.6.2.3, Action a, requires restoration of an inoperable suppression pool cooling loop within 72 hours. Under the same conditions, ITS 3.6.2.3, Required Action A.1, allows 7 days to restore an inoperable suppression pool cooling subsystem.	3.6.2.3, Required Action A.1	3.6.2.3, Action a	G
3.6.2.3 L.2	CTS 3.6.2.3, Action b, requires that the reactor be in Mode 3 within 12 hours and Mode 4 within 36 hours if both suppression pool cooling loops are inoperable. Under the same conditions, ITS 3.6.2.3, Required Action B.1, allows 8 hours to attempt to restore at least one inoperable suppression pool cooling subsystem to Operable status before a plant shutdown must be initiated.	3.6.2.3, Required Action B.1	3.6.2.3, Action b	G
3.6.2.4, Residual Heat Removal (RHR) Suppression Pool Spray				
None				
3.6.3.1, Primary Containment Hydrogen Recombiners				
3.6.3.1 L.1	ITS 3.6.3.1, Required Action A.1 Note, identifies that LCO 3.0.4 is not applicable for the condition of one hydrogen recombiner inoperable has been added. An Operable recombiner remains available in this condition, and at least one other combustible gas control method is available to back up the remaining recombiner.	3.6.3.1, Required Action A.1 Note	3.6.6.1 Actions	J

Less Restrictive Change Categories

A (L.A.x) Relocation of Details	F	Surveillance Frequency Extensions / Allowances For Delay Due To Plant Conditions
B (L.B.x) Elimination of Surveillances "prior to an activity" When Periodic Surveillance Suffices	G	Relaxation in Actions & Avoidance of Plant Shutdowns
C (L.C.x) AOT / STI Revisions Supported by NRC Approved Topicals	H	Relaxation in Surveillance Acceptance Criteria
D Applicability Changes (relaxations)	I	Relaxation in LCO Requirements
E AOT Extensions	J	Relaxation in Mode Change Restrictions (LCO / SR 3.0.4 Relaxations)
	R	(L.R.x) Elimination of Details Not In Regulatory Controlled Locations

Table L - Less Restrictive Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.3.1 L.2	ITS 3.6.3.1 Action B is added for the condition of both containment hydrogen recombiners inoperable. Since the nitrogen inerting and the purge system are also designed to control combustible gas levels in a post-LOCA environment, the combustible gas control function is not completely lost.	3.6.3.1 Action B	3.0.3 3.6.6.1 Actions	E, G
3.6.3.1 L.3	CTS 4.6.6.1.a, requires performing a recombiner system functional test once per 6 months. ITS SR 3.6.3.1.1 revises this SR by requiring a system functional test of each primary containment hydrogen recombiner every 18 months.	SR 3.6.3.1.1	4.6.6.1.a	F
3.6.3.2, Primary Containment Oxygen Concentration				
None				
3.6.4.1, Secondary Containment				
3.6.4.1 LR.1	CTS 4.6.5.1.d.1 requires verification that one SGT subsystem draws down the secondary containment "at a flow rate not exceeding 3800 cfm." ITS SR 3.6.4.1.5 does not impose an SGT flow rate limit during testing of the vacuum drawdown phase in secondary containment.	SR 3.6.4.1.5	4.6.5.1.d.1	R
3.6.4.2, Secondary Containment Isolation Valves (SCIVs)				
3.6.4.2 LR.1	CTS 4.6.5.2.a requires a demonstration of Operability after maintenance or repair on an isolation valve. The proposed change removes this requirement from Technical Specifications.	None	SR 4.6.5.2.a	R

Less Restrictive Change Categories

- A (L.A.x) Relocation of Details
- B (L.B.x) Elimination of Surveillances "prior to an activity" When Periodic Surveillance Suffices
- C (L.C.x) AOT / STI Revisions Supported by NRC Approved Topicals
- D Applicability Changes (relaxations)
- E AOT Extensions

- F Surveillance Frequency Extensions / Allowances For Delay Due To Plant Conditions
- G Relaxation in Actions & Avoidance of Plant Shutdowns
- H Relaxation in Surveillance Acceptance Criteria
- I Relaxation in LCO Requirements
- J Relaxation in Mode Change Restrictions (LCO / SR 3.0.4 Relaxations)
- R (L.R.x) Elimination of Details Not In Regulatory Controlled Locations

Table L - Less Restrictive Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.4.2 L.R.2	Not Used			
3.6.4.2 L.1	ITS 3.6.4.2 includes an explicit allowance for intermittently opening closed Secondary Containment Isolation Valves under administrative control as is allowed in the CTS for primary containment isolation valves. The allowance is included in Actions Note 1 and SR 3.6.4.2.1 Note 2.	3.6.4.2, Actions Note 1 SR 3.6.4.2.1 Note 2	3.6.5.2 Actions	G
3.6.4.2 L.2	CTS 3.6.5.2 Actions for inoperable secondary containment isolation dampers, which requires maintaining one isolation damper Operable, would not be met in the event both dampers in a penetration are inoperable. In this event, an immediate shutdown (per CTS 3.6.5.2 "otherwise ..." Action) is required. ITS 3.6.4.2, Action B, provides 4 hours for isolation, prior to commencing a required shutdown. This 4 hour period is consistent with time allowed for an inoperable secondary containment, and is therefore an appropriate allowance.	3.6.4.2, Action B	3.6.5.2 Actions	E
3.6.4.2 L.3	CTS 4.6.5.1.b.3 addresses the monthly verification of secondary containment isolation with non-automatic valves. By virtue of being associated with CTS 3.6.5.1, any failure of this surveillance results in applying either a 4 hour restoration (in MODES 1, 2, and 3) or an "immediate" restoration (other required condition). ITS combines all penetration isolation valve requirements in ITS 3.6.4.2, and allows an 8 hour restoration.	3.6.4.2 Actions	4.6.5.1.b.3	E
3.6.4.2 L.4	Not Used			

Less Restrictive Change Categories

A	(L.A.x) Relocation of Details	F	Surveillance Frequency Extensions / Allowances For Delay Due To Plant Conditions
B	(L.B.x) Elimination of Surveillances "prior to an activity" When Periodic Surveillance Suffices	G	Relaxation in Actions & Avoidance of Plant Shutdowns
C	(L.C.x) AOT / STI Revisions Supported by NRC Approved Topicals	H	Relaxation in Surveillance Acceptance Criteria
D	Applicability Changes (relaxations)	I	Relaxation in LCO Requirements
E	AOT Extensions	J	Relaxation in Mode Change Restrictions (LCO / SR 3.0.4 Relaxations)
		R	(I.R.x) Elimination of Details Not In Regulatory Controlled Locations

Table L - Less Restrictive Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.4.2 L.5	CTS 4.6.5.1.b addresses the monthly verification of secondary containment isolation with non-automatic valves. ITS SR 3.6.4.2.1 requires this same monthly verification, but excludes valves that are locked, sealed, or otherwise secured in the closed position.	SR 3.6.4.2.1	4.6.5.1.b	H
3.6.4.3, Standby Gas Treatment (SGT) System				
3.6.4.3 L.1	CTS 3.6.5.3, Action a.2, requires that the applicable activities (handling irradiate fuel, Core Alterations, and OPDRV) must be suspended immediately if one inoperable standby gas treatment subsystem cannot be returned to Operable status within 7 days. Under the same conditions, ITS 3.6.4.3, Required Action C.1, allows these applicable activities to continue if the Operable subsystem of SGT is placed in operation.	3.6.4.3, Required Action C.1	3.6.5.3, Action a.2	G

Less Restrictive Change Categories

- A (LA.x) Relocation of Details
- B (LB.x) Elimination of Surveillances "prior to an activity" When Periodic Surveillance Suffices
- C (LC.x) AOT / STI Revisions Supported by NRC Approved Topicals
- D Applicability Changes (relaxations)
- E AOT Extensions

F

Surveillance Frequency Extensions / Allowances For Delay Due To Plant Conditions
Relaxation in Actions & Avoidance of Plant Shutdowns
Relaxation in Surveillance Acceptance Criteria
Relaxation in LCO Requirements
Relaxation in Mode Change Restrictions (LCO / SR 3.0.4 Relaxations)
(LR.x) Elimination of Details Not In Regulatory Controlled Locations

Table L - Less Restrictive Changes to Current Technical Specifications
ITS Section 3.7, Plant Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.1, Residual Heat Removal Service Water (RHRSW) System				
3.7.1 L.1	CTS 3.7.1.1 Action a.3 allows one RHRSW subsystem to be inoperable for 72 hours. ITS 3.7.1 Action C allows one RHRSW subsystem to be inoperable for 7 days. With one RHRSW subsystem inoperable, the safety function of one RHR Suppression Pool Cooling subsystem is still maintained, but the capability of the RHRSW system is reduced since a single active failure could reduce the system capacity below that assumed in the safety analysis. A 7 day Completion Time is appropriate based on the redundant RHRSW capabilities afforded by the Operable subsystem and the low probability of an event occurring requiring RHRSW during this period. Furthermore, the 7 day Completion Time is consistent with ITS 3.6.2.3, Condition A, which allows a 7 day Completion Time for a loss of one RHR suppression pool cooling subsystem. Therefore, this less restrictive change will have a minimal impact on safety.	3.7.1 Action C	3.7.1.1 Action a.3	E

Less Restrictive Change Categories

A (L.A.x) Relocation of Details	F	Surveillance Frequency Extensions / Allowances For Delay Due To Plant Conditions
B (L.B.x) Elimination of Surveillances "prior to an activity" When Periodic Surveillance Suffices	G	Relaxation in Actions & Avoidance of Plant Shutdowns
C (L.C.x) AOT / STI Revisions Supported by NRC Approved Topicals	H	Relaxation in Surveillance Acceptance Criteria
D Applicability Changes (relaxations)	I	Relaxation in LCO Requirements
E AOT Extensions	J	Relaxation in Mode Change Restrictions (LCO / SR 3.0.4 Relaxations)
	R	(L.R.x) Elimination of Details Not In Regulatory Controlled Locations

Table L - Less Restrictive Changes to Current Technical Specification is
ITS Section 3.7, Plant Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.2, EECW / EESW System and UHS				
3.7.2 L.1	CTS 3.8.2.1, DC Sources, Actions for inoperable battery chargers are modified by a footnote allowing a 16 hour delay "for battery chargers made inoperable due to loss of EECW cooling." Similarly, CTS 3.8.3.1, Onsite Power Distribution Systems, for inoperable distribution busses are modified by a footnote allowing a 16 hour delay "for AC distribution system components made inoperable due to loss of EECW cooling." The ITS, in accordance with LCO 3.0.6, allows the Actions of EECW to suffice; without invoking the Actions for the inoperable battery charger, or inoperable power distribution systems. This provides a restoration time of 72 hours for loss of EECW cooling to one division of battery chargers, and one division of AC power distribution.	3.7.2	3.8.2.1 3.8.3.1	E

Less Restrictive Change Categories

A	(LA.x) Relocation of Details	F	Surveillance Frequency Extensions / Allowances For Delay Due To Plant Conditions
B	(LB.x) Elimination of Surveillances "prior to an activity" When Periodic Surveillance Suffices	G	Relaxation in Actions & Avoidance of Plant Shutdowns
C	(LC.x) AOT / STI Revisions Supported by NRC Approved Topicals	H	Relaxation in Surveillance Acceptance Criteria
D	Applicability Changes (relaxations)	I	Relaxation in LCO Requirements
E	AOT Extensions	J	Relaxation in Mode Change Restrictions (LCO / SR 3.0.4 Relaxations)
		R	(LR.x) Elimination of Details Not In Regulatory Controlled Locations

Table L - Less Restrictive Changes to Current Technical Specification :
ITS Section 3.7, Plant Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.2 L.2	CTS 3.7.1.5 Action c, when one or more cross-connect valves are inoperable, requires both cross-connect valves to be opened and de-energized, which provides for continued Operability of the UHS. This action also requires once-per-7-day verification that both cross-connect valves are opened and de-energized. ITS does not include the once-per-7-day verification; instead relying on the normal periodic verification of valve position that is required once per 31 days (per CTS 4.7.1.5.b.2 and ITS SR 3.7.2.3). The ITS Bases describe the proper position of these cross-connect valves to support UHS Operability as either capable of being opened or de-energized opened. With UHS Operability being maintained by de-energized open cross-connect valves, the potential for valve misalignment is less than if the valves remained energized. Given the continued Operability of UHS, the more conservative assurance of proper valve position when de-energized, and the normally acceptable periodic frequency of position verification, elimination of the increased frequency of position verification is not a significant impact on safety.	N/A	3.7.1.5 Action c	F

Less Restrictive Change Categories

A (L.A.x) Relocation of Details	F	Surveillance Frequency Extensions / Allowances For Delay Due To Plant Conditions
B (L.B.x) Elimination of Surveillances "prior to an activity" When Periodic Surveillance Suffices	G	Relaxation in Actions & Avoidance of Plant Shutdowns
C (L.C.x) AOT / STI Revisions Supported by NRC Approved Topicals	H	Relaxation in Surveillance Acceptance Criteria
D Applicability Changes (relaxations)	I	Relaxation in LCO Requirements
E AOT Extensions	J	Relaxation in Mode Change Restrictions (LCO / SR 3.0.4 Relaxations)
	R	(L.R.x) Elimination of Details Not In Regulatory Controlled Locations

Table L - Less Restrictive Changes to Current Technical Specifications
ITS Section 3.7, Plant Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.3, Control Room Emergency Filtration (CREF) System				
3.7.3 L.1	CTS 3.7.2, Action b.1 (loss of both CREF subsystems or loss of required flow path) requires that the reactor be in Mode 3 within 6 hours and Mode 4 within 36 hours but does not currently require entry into LCO 3.0.3. Under the same conditions, ITS 3.7.3, Action D, requires immediate entry into LCO 3.0.3. LCO 3.0.3 allows 13 hours to reach Mode 3 and 37 hours to reach Mode 4, and therefore, is less restrictive. Also accompanying this relaxation is a more restrictive requirement to be in Mode 2 in 7 hours. The requirement to enter LCO 3.0.3 following the loss of the CREF system function recognizes that a significant plant transient (reactor shutdown and cooldown) will be performed without the required CREF system function. Under these circumstances, entry into LCO 3.0.3 and the resulting associated requirements is appropriate. The additional time allowed to reach Mode 3 and Mode 4 is not significant and has no impact on the level of plant safety.	3.7.3, Action D	3.7.2, Action b.1	G
3.7.3 L.2	CTS 4.7.2.2 requires an inspection of applied silicone sealant and a Special Report in the event abnormal degradation of the silicone sealant on the inspected duct work is discovered. In the event of abnormal degradation, the cause and corrective action is pursued in a timely manner. This also entails a determination of system Operability, which will dictate whether continued operation would be allowed. Additionally, depending on the impact on the system's function, the degradation may be reportable under 10 CFR 50.72 or 10 CFR 50.73. Since the activities required to be reported in the Special Report will be taken regardless of the existence of the reporting requirement, and existing reporting requirements will dictate necessary reporting to the NRC, the ITS does not include this reporting requirement.	N/A	4.7.2.2	G

Less Restrictive Change Categories

- A (L.A.x) Relocation of Details
- B (L.B.x) Elimination of Surveillances "prior to an activity" When Periodic Surveillance Suffices
- C (L.C.x) AOT / STI Revisions Supported by NRC Approved Topicals
- D Applicability Changes (relaxations)
- E AOT Extensions

- F Surveillance Frequency Extensions / Allowances For Delay Due To Plant Conditions
- G Relaxation in Actions & Avoidance of Plant Shutdowns
- H Relaxation in Surveillance Acceptance Criteria
- I Relaxation in LCO Requirements
- J Relaxation in Mode Change Restrictions (LCO / SR 3.0.4 Relaxations)
- R (L.R.x) Elimination of Details Not In Regulatory Controlled Locations

Table L - Less Restrictive Changes to Current Technical Specifications
ITS Section 3.7, Plant Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.3 L.3	CTS 4.7.2.1.e.2 surveillance requires that each subsystem be tested every eighteen months to show: (1) that the subsystem automatically switches to the required mode of operation, and (2) that the control room pressure is maintained. The ITS also requires both subsystems be tested every 18 months to show automatic actuation (refer to ITS SR 3.7.3.4). However, the control room pressure requirement is a test of the integrity of the control room enclosure and can be verified by using either subsystem. Given the other subsystem filtration tests that must be performed every 18 months to demonstrate proper subsystem operation (refer to ITS SR 3.7.3.2), the control room enclosure test need only be verified once every 18 months using one subsystem. To add assurance of no undetected subsystem failures, this testing of the control room enclosure is required to be demonstrated by alternating the CREF subsystems each outage (i.e., on a Staggered Test Basis).	SR 3.7.3.5	4.7.2.1.e.2	F
3.7.4, Control Center Air Conditioning (AC) System				
3.7.4 L.1	With the addition of the new Control Center AC System Specification, the time allowed with an inoperable AC subsystem has been increased from 7 days (CTS Actions b.2 and c.1) to 30 days (ITS Action A). The 7 day allowance was based upon the inoperability of a Control Room Emergency Filtration (CREF) subsystem, of which the AC subsystem was considered a component. The 30 day allowance in ITS is based upon only the AC subsystem being inoperable. The longer time period reflects that at least one AC subsystem is always operating thus giving additional assurance that a sole remaining subsystem will be Operable should it be needed during the 30 day period. Additionally alternative cooling means may be able to mitigate a complete loss of cooling. On this basis the longer out of service time is justified.	3.7.4 Action A	3.7.2 Actions b.2 and c.1	E

Less Restrictive Change Categories

A	(L.A.x) Relocation of Details	F	Surveillance Frequency Extensions / Allowances For Delay Due To Plant Conditions
B	(L.B.x) Elimination of Details	G	Relaxation in Actions & Avoidance of Plant Shutdowns
C	(L.C.x) Elimination of Surveillances "prior to an activity" When Periodic Surveillance Suffices	H	Relaxation in Surveillance Acceptance Criteria
D	(L.C.x) AOT / STI Revisions Supported by NRC Approved Topicals	I	Relaxation in LCO Requirements
E	Applicability Changes (relaxations)	J	Relaxation in Mode Change Restrictions (LCO / SR 3.0.4 Relaxations)
	ACT Extensions	K	(L.R.x) Elimination of Details Not In Regulatory Controlled Locations

Table L - Less Restrictive Changes to Current Technical Specifications
ITS Section 3.7, Plant Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.4 L.2	CTS 3.7.2, Action b.1 (loss of both Control Center AC subsystems or loss of required flow path) requires that the reactor be in Mode 3 within 6 hours and Mode 4 within 36 hours but does not currently require entry into LCO 3.0.3. Under the same conditions, ITS 3.7.4, Action D, requires immediate entry into LCO 3.0.3. LCO 3.0.3 allows 13 hours to reach Mode 3 and 37 hours to reach Mode 4, and therefore, is less restrictive. Also accompanying this relaxation is a more restrictive requirement to be in Mode 2 in 7 hours. The requirement to enter LCO 3.0.3 following the loss of the Control Center AC System function recognizes that a significant plant transient (reactor shutdown and cooldown) will be performed without the required system function. Under these circumstances, entry into LCO 3.0.3 and the resulting associated requirements is appropriate. The additional time allowed to reach Mode 3 and Mode 4 is not significant and has no impact on the level of plant safety.	3.7.4 Action D	3.7.2, Action b.1	G
3.7.5, Main Condenser Offgas				
None				
3.7.6, Main Turbine Bypass System				
None				
3.7.7, Spent Fuel Storage Pool Water Level				
None				

Less Restrictive Change Categories

A (L.A.x) Relocation of Details	F	Surveillance Frequency Extensions / Allowances For Delay Due To Plant Conditions
B (L.B.x) Elimination of Surveillances "prior to an activity" When Periodic Surveillance Suffices	G	Relaxation in Actions & Avoidance of Plant Shutdowns
C (L.C.x) AOT / STI Revisions Supported by NRC Approved Topicals	H	Relaxation in Surveillance Acceptance Criteria
D Applicability Changes (relaxations)	I	Relaxation in LCO Requirements
E AOT Extensions	J	Relaxation in Mode Change Restrictions (LCO / SR 3.0.4 Relaxations)
	R	(L.R.x) Elimination of Details Not In Regulatory Controlled Locations

Table L - Less Restrictive Changes to Current Technical Specifications
ITS Section 3.7, Plant Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.8, EDGSW System				
None				

Less Restrictive Change Categories

A (L.A.x) Relocation of Details	F	Surveillance Frequency Extensions / Allowances For Delay Due To Plant Conditions
B (L.B.x) Elimination of Surveillances "prior to an activity" When Periodic Surveillance Suffices	G	Relaxation in Actions & Avoidance of Plant Shutdowns
C (L.C.x) AOT / STI Revisions Supported by NRC Approved Topicals	H	Relaxation in Surveillance Acceptance Criteria
D Applicability Changes (relaxations)	I	Relaxation in LCO Requirements
E AOT Extensions	J	Relaxation in Mode Change Restrictions (LCO / SR 3.0.4 Relaxations)
	R	(L.R.x) Elimination of Details Not In Regulatory Controlled Locations

Table LA - Details Relocated from Current Technical Specification:
ITS Section 3.6, Containment Systems

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Characterization
3.6.1.1, Primary Containment					
3.6.1.1 LA.1	4.6.2.1.e	CTS 4.6.2.1.e requires a visual inspection of the suppression chamber every 18 months. Visual examinations are a 10 CFR 50, Appendix J, requirement prior to Type A leak rate testing (and as such, are required by ITS SR 3.6.1.1). This adequately prescribes the frequency for these visual examinations without the need for a Technical Specification requirement for more frequent examinations. Therefore, this more frequent inspection is relocated from Technical Specifications to the Technical Requirements Manual.	TRM	10 CFR 50.59	Relocation of details concerning methodology for meeting requirements.
3.6.1.1 LA.2	3.6.2.1.b	CTS 3.6.2.1.b details the requirement for drywell bypass leakage testing by stating the acceptance criteria as "the equivalent leakage through a 1-inch diameter orifice." ITS SR 3.6.1.1.2 provides the detailed acceptance criteria that this corresponds to. The "equivalency" is relocated to the Bases.	Bases	ITS 5.5.10	Relocation of details concerning methodology for meeting requirements.
3.6.1.2, Primary Containment Air Lock					
3.6.1.2 LA.1	3.6.1.3.a	CTS 3.6.1.3.a requires the primary containment airlock to be Operable and provides details of what constitutes Operability. ITS 3.6.1.2 requires the primary containment airlock to be Operable but does not define details of Operability. These details of specific Operability requirements are moved to the Bases.	Bases	ITS 5.5.10	Relocation of details concerning methodology for meeting requirements.

Table LA - Details Relocated from Current Technical Specification :
ITS Section 3.6, Containment Systems

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Characterization
3.6.1.3, Primary Containment Isolation Valves (PCIVs)					
3.6.1.3 LA.1	Table 4.6.1.1-1	CTS Table 4.6.1.1-1, and various references to it in CTS 3/4.6.1.1, will be relocated from the Technical Specifications to the Technical Requirements Manual (TRM). The specific relocation of component lists from Technical Specifications is consistent with the direction of Generic Letter 91-08, "Removal Of Component Lists From Technical Specifications."	TRM	10 CFR 50.59	Relocation of details concerning methodology for meeting requirements.
3.6.1.3 LA.2	3.6.1.8 4.6.1.8.2	CTS 3.6.1.8 and 4.6.1.8.2 include details relating to purge system design (e.g., valve flow path diameter). ITS 3.6.1.3 makes generic reference to "purge system isolation valves" and does not include the details of system design. These details are relocated to the Bases.	Bases	ITS 5.5.10	Relocation of system design details.
3.6.1.3 LA.3	4.6.1.8.2	CTS 4.6.1.8.2 details the purge valve leakage acceptance criteria. ITS SR 3.6.1.3.6 presents only the requirement to perform the test, with the details of the acceptance criteria being relocated to the Bases.	Bases	ITS 5.5.10	Relocation of details concerning methodology for meeting requirements.
3.6.1.3 LA.4	4.6.3.5	CTS 4.6.3.5 requires periodic testing of the TIP System explosive isolation valve. This requirement provides details for the selection of the replacement charge. ITS SR 3.6.1.3.10 requires this same test, but relocates the details regarding the selection of the replacement charge from the Technical Specifications to the ITS Bases.	Bases	ITS 5.5.10	Relocation of details concerning methodology for meeting requirements.

Table LA - Details Relocated from Current Technical Specification :
ITS Section 3.6, Containment Systems

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Characterization
3.6.1.3 LA.5	3.6.2.1.d, 3.6.2.1.e, 3.6.1.2 Actions d and e	CTS 3.6.1.2 items d and e, and Actions d and e contain explicit acceptance criteria for the hydrostatic leakage test limit. ITS SR 3.6.1.3.13 maintains the required hydrostatic leakage test, however, the specific acceptance criteria are relocated to the Bases.	Bases	ITS 5.5.10	Relocation of details concerning methodology for meeting requirements.
3.6.1.3 LA.6	4.6.3.2	CTS 4.6.3.2 requires an automatic isolation valve test, but restricts performance of this test to "during Cold Shutdown or Refueling." ITS SR 3.6.1.3.8 requires this same test, but removes details regarding requisite plant conditions and scheduling. These details do not impact the requirement to maintain the valves Operable, and the ITS SR continues to ensure that all automatic PCIVs function properly. Therefore, this change will not have any negative impact on safety. Removal of this restriction was recommended by and supported in Generic Letter 91-04. The ITS Bases continue to acknowledge that, at least for many of the PCIVs, it is prudent to conduct the testing during outages; as such, this aspect of the CTS restriction is relocated to the ITS Bases.	Bases	ITS 5.5.10	Relocation of details concerning methodology for meeting requirements.
3.6.1.3 LA.7	4.6.3.3	CTS 4.6.3.3 requires determination of the isolation time of power-operated as well as automatic PCIVs. ITS SR 3.6.1.3.5 (in conjunction with approved generic change TSTF-46) requires only the determination of the isolation time for automatic PCIVs. The requirement for the determination of the isolation time for non-automatic power-operated PCIVs is relocated to the Inservice Testing (IST) Program, which requires changes be made in accordance with 10 CFR 50.55a. The relocation of this testing will not impact the function of these valves, or the periodic verification of their operability. As such, there is no adverse impact on the health and safety of the public	IST Program	10 CFR 50.55a	Relocation of details concerning methodology for meeting requirements.

Table LA - Details Relocated from Current Technical Specification
ITS Section 3.6, Containment Systems

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Characterization
3.6.1.4, Primary Containment Pressure					
None					
3.6.1.5, Drywell Air Temperature					
3.6.1.5 LA.1	4.6.1.7	CTS 4.6.1.7 requires the drywell average air temperature to be determined and details how the SR is to be performed. ITS SR 3.6.1.5.1 requires that the drywell average air temperature be determined, but does not specify how the SR is to be performed. The "volumetric average" computational method and specific temperature monitoring locations are relocated to the ITS Bases.	Bases	ITS 5.5.10	Relocation of details concerning methodology for meeting requirements.
3.6.1.6, Low-Low Set (LLS) Valves					
None					
3.6.1.7, Reactor Building-to-Suppression Chamber Vacuum Breakers					
3.6.1.7 LA.1	3.6.4.2 Action c 4.6.4.2	CTS 3.6.4.2 Actions and associated surveillance requirements for the vacuum breaker position indicators are being relocated to the Technical Requirements Manual.	TRM	10 CFR 50.59	Relocation of performance requirements for indication.
3.6.1.7 LA.2	4.6.4.2.b.2.b)	CTS 4.6.4.2.b.2.b) requires a visual inspection of the reactor building-to-suppression chamber vacuum breakers. This inspection requirement is relocated from Technical Specifications to the TRM.	TRM	10 CFR 50.59	Relocation of details concerning methodology for meeting requirements.

**Table LA - Details Relocated from Current Technical Specification
ITS Section 3.6, Containment Systems**

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Characterization
3.6.1.7 LA.3	4.6.4.2	CTS 4.6.4.2 requires the demonstration that the force required to open each vacuum breaker does not exceed "the equivalent of" 0.5 psid. ITS SR 3.6.1.7.3 requires this same demonstration, but relocates the wording "the equivalent of" to the ITS SR Bases.	Bases	ITS 5.5.10	Relocation of details concerning methodology for meeting requirements.
3.6.1.8, Suppression-Chamber-to Drywell-Vacuum Breakers					
3.6.1.8 LA.1	3.6.4.1 Action c and 4.6.4.1.b.1.b), b.2.b), and b.2.c)	CTS 3.6.4.1 Actions and associated surveillance requirements for the vacuum breaker position indicators are being relocated to the Technical Requirements Manual and ITS Base.	TRM Bases	10 CFR 50.59 ITS 5.5.10	Relocation of performance requirements for indication.
3.6.1.9, Main Steam Isolation Valve (MSIV) Leakage Control System (LCS)					
3.6.1.9 LA.1	3.6.1.4 4.6.1.4	CTS 3.6.1.4 and 4.6.1.4 include details relating to system design, and Operability for the MSIV LCS, as well as details of some (but not all) valves that are testable during operation. ITS 3.6.1.9 includes only a requirement for Operability and moves details of system design, specific Operability requirements, and the status of the third motor-operated MSIV as a valve that is not testable during operation, to the Bases.	Bases	ITS 5.5.10	Relocation of system design details.
3.6.1.9 LA.2	4.6.1.4.c	CTS 4.6.1.4.c includes details relating to methods for performing Surveillances. These details are not included in the ITS, but are relocated to the Bases.	Bases	ITS 5.5.10	Relocation of details concerning methodology for meeting requirements.

Table LA - Details Relocated from Current Technical Specification ;
ITS Section 3.6, Containment Systems

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Characterization
3.6.1.9 LA.3	4.6.1.4.d	CTS 4.6.1.4.d, requires the verification of the pressure control (pressure and Dp) instrumentation to be Operable and specifically requires the performance of a Channel Check, Channel Functional Test and Channel Calibration of this pressure control instrumentation. These requirements are relocated to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	Relocation of details concerning methodology for meeting requirements.
3.6.2.1, Suppression Pool Average Temperature					
3.6.2.1 LA.1	3.6.2.1, Action c and d, and 4.6.2.1.f	CTS 3.6.2.1, Action c and d, and 4.6.2.1.f, establish, Actions and Surveillance Requirements for the instrumentation used to monitor suppression pool temperature. These requirements are relocated to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	Relocation of performance requirements for indication.
3.6.2.2, Suppression Pool Water Level					
3.6.2.2 LA.1	3.5.3 3.6.2.1	CTS 3.5.3 and 3.6.2.1 establish limits for both the level and volume of water in the suppression pool. These volume and level limits are equivalent and interchangeable; however, only the suppression pool level information is directly available to the plant operators. ITS 3.6.2.2 establishes the limits in level only. This is acceptable because the redundant volume information contained in the CTS has no impact on the ITS requirements. Therefore, the suppression pool volumes which correspond to the level limits are being moved to the Bases.	Bases	ITS 5.5.10	Relocation of system design details.

Table LA - Details Relocated from Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Characterization
3.6.2.2 LA.2	3.6.2.1, Actions e and f, and 4.6.2.1.g	CTS 3.6.2.1, Actions e and f, and 4.6.2.1.g, establish Actions and Surveillance Requirements for the instrumentation used to monitor suppression pool level. This instrumentation performs an alarm-only or indication-only function, performs no automatic function and is not assumed in any event that depends on operator action. Alarm-only and indication-only functions do not necessarily relate directly to the Operability of the related systems. ITS 3.6.2.2 requires that the suppression pool level be maintained, but does not specify the requirements for the instrumentation. This is acceptable because the monitoring instrumentation, as described above, does not impact the requirement to maintain suppression pool level. These items are relocated to the TRM.	TRM	10 CFR 50.59	Relocation of performance requirements for indication.
3.6.2.3, Residual Heat Removal (RHR) Suppression Pool Cooling					
3.6.2.3 LA.1	3.6.2.3	CTS 3.6.2.3 includes details relating to system design, function, and Operability for the suppression pool cooling mode of the residual heat removal system. ITS 3.6.2.3 includes only a requirement for Operability and moves details of system design and specific Operability requirements to the Bases.	Bases	ITS 5.5.10	Relocation of system design details.

Table LA - Details Relocated from Current Technical Specification s
ITS Section 3.6, Containment Systems

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Characterization
3.6.2.4, Residual Heat Removal (RHR) Suppression Pool Spray					
3.6.2.4 LA.1	3.6.2.4	CTS 3.6.2.2 includes details relating to system design, function, and Operability for the suppression pool spray mode of the residual heat removal system. ITS 3.6.2.4 includes only a requirement for Operability and moves details of system design and specific Operability requirements to the Bases.	Bases	ITS 5.5.10	Relocation of system design details.
3.6.3.1, Primary Containment Hydrogen Recombiners					
3.6.3.1 LA.1	4.6.6.1.b.1	CTS 4.6.6.1.b.1, requires the hydrogen recombiner system to be Operable and specifically requires the performance of Channel Calibration of all recombiner operating instrumentation and control circuits. ITS 3.6.3.1 Surveillance Requirements require the hydrogen recombiners to be Operable, but does not require the performance of a Channel Calibration. This is acceptable because the test ensures that the instruments monitoring the hydrogen recombiner are functioning properly, but does not directly determine the Operability of the recombiner and therefore does not impact the ITS requirement to maintain the hydrogen recombiner Operable. Therefore, these requirements will be adequately defined and controlled in the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	Relocation of details concerning methodology for meeting requirements.

Table LA - Details Relocated from Current Technical Specification :
ITS Section 3.6, Containment Systems

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Characterization
3.6.3.1 LA.2	4.6.6.1.a 4.6.6.1.b.2	CTS 4.6.6.1.a and CTS 4.6.6.1.b.2 require performing a system functional test and the verification of the hydrogen recombiner heater resistance, including details of how the tests are performed and the acceptance criteria for the tests. ITS SR 3.6.3.1.1 and SR 3.6.3.1.3 require these tests, but do not detail how the tests are to be performed. These details are relocated to the Bases.	Bases	ITS 5.5.10	Relocation of details concerning methodology for meeting requirements.
3.6.3.1 LA.3	4.6.6.1.b.3	CTS 4.6.6.1.b.3 requires the performance of a visual examination and details examples of abnormal conditions to look for during a visual examination. ITS SR 3.6.3.1.2 requires a visual examination to be performed, but does not define examples of abnormal conditions to look for. These details are relocated to the Bases.	Bases	ITS 5.5.10	Relocation of details concerning methodology for meeting requirements.
3.6.3.1 LA.4	3.6.6.1	CTS 3.6.6.1 details, defining the primary containment hydrogen recombiner system, are relocated to the ITS Bases. The information provided in this section, defines what constitutes a primary containment hydrogen recombiner. This information is not directly related to the Operability of the hydrogen recombiner. Therefore, this information can be relocated to the Bases.	Bases	ITS 5.5.10	Relocation of system design details.
3.6.3.2, Primary Containment Oxygen Concentration					
None					
3.6.4.1, Secondary Containment					
None					

Table LA - Details Relocated from Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Characterization
3.6.4.2, Secondary Containment Isolation Valves (SCIVs)					
3.6.4.2 LA.1	3/4.6.5.2 Table 3.6.5.2-1	CTS Table 3.6.5.2-1, and various references to it in CTS 3/4.6.5.2, will be relocated from the Technical Specifications to the Technical Requirements Manual (TRM). The specific relocation of component lists, and their isolation times from Technical Specifications is consistent with the direction of Generic Letter 91-08, "Removal Of Component Lists From Technical Specifications."	TRM	10 CFR 50.59	Relocation of details concerning methodology for meeting requirements.
3.6.4.2 LA.2	4.6.5.2.b	CTS 4.6.5.2.b requires an automatic isolation valve test, but restricts performance of this test to "during Cold Shutdown or Refueling." ITS SR 3.6.4.2.3 requires this same test, but removes details regarding requisite plant conditions and scheduling. These details do not impact the requirement to maintain the valves Operable, and the ITS SR continues to ensure that all automatic SCIVs function properly. Therefore, this change will not have any negative impact on safety. Removal of this restriction was recommended by and supported in Generic Letter 91-04. The ITS Bases continue to acknowledge that, at least for many of the SCIVs, it is prudent to conduct the testing during outages; as such, this aspect of the CTS restriction is relocated to the ITS Bases.	Bases	ITS 5.5.10	Relocation of details concerning methodology for meeting requirements.

Table LA - Details Relocated from Current Technical Specification ;
ITS Section 3.6, Containment Systems

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Characterization
3.6.4.3, Standby Gas Treatment (SGT) System					
3.6.4.3 LA.1	4.6.5.3.a 4.6.5.3.d.2 4.6.5.3.d.4	The following CTS details for performing Surveillances are not included in the ITS. These detailed methods for performing Surveillances will be moved to the Bases: a. CTS 4.6.5.3.a details the method of starting a subsystem ("initiating, from the control room,") and details of system operation ("flow through the HEPA filters and charcoal adsorbers"); b. CTS 4.6.5.3.d.2 system functional test actuation includes details of system operation ("starts and isolation dampers open"); and c. CTS 4.6.5.3.d.4 contain details the method opening and starting the filter cooling bypass dampers and fan ("remote manually").	Bases	ITS 5.5.10	Relocation of details concerning methodology for meeting requirements.
3.6.4.3 LA.2	3.6.5.3	CTS 3.6.5.3 provides a detail defining the SGT System (i.e., "independent"). The details relating to system design, function, and Operability are not necessary in the ITS. This detail is relocated to the ITS Bases.	Bases	ITS 5.5.10	Relocation of system design details.

Table LA - Details Relocated from Current Technical Specifications
ITS Section 3.7, Plant Systems

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Characterization
3.7.1, Residual Heat Removal Service Water (RHRSW) System					
3.7.1 LA.1	3.7.1.1	CTS 3.7.1.1 requires that two RHRSW subsystems be Operable and defines what equipment comprises an RHRSW subsystem. ITS 3.7.1 requires that two RHRSW subsystems are Operable, but does not identify what equipment is required for an RHRSW subsystem; these details are relocated to the Bases of ITS 3.7.1. This is acceptable because the identification of the specific equipment does not impact the ITS requirement to maintain two RHRSW subsystems Operable. Therefore, this information can be adequately defined and controlled in the ITS Bases.	Bases	ITS 5.5.10	Relocation of system design details.
3.7.2, EECW / EESW System and UHS					
3.7.2 LA.1	3.7.1.2, 3.7.1.3, 3.7.1.5, and 3.7.1.5 Action c	CTS LCOs 3.7.1.2, 3.7.1.3, 3.7.1.5, and 3.7.1.5 Action c include details relating to system design, function, and Operability for the EECW, EESW, UHS, and cross-connect line respectively. ITS 3.7.2 includes only a requirement for Operability and does not include the details of system design and specific flow path and Operability requirements. This is acceptable because these details do not impact the requirement to maintain the equipment Operable and the ITS definition for Operability ensures that all equipment required to maintain Operability is functioning. These details will be relocated to the Bases.	Bases	ITS 5.5.10	Relocation of system design details.
3.7.2 LA.2	4.7.1.5.b.2	CTS 4.7.1.5.b.2 details proper positioning of UHS cross-connect valves. ITS SR 3.7.2.4 provides the requirement for verifying all safety related valves to be "in the correct position." The ITS presentation does not detail these correct positions. The details found in CTS are located in the Bases for ITS SR 3.7.2.4.	Bases	ITS 5.5.10	Relocation of details concerning methodology for meeting requirements.

Table LA - Detail Relocated from Current Technical Specification
ITS Section 3.7, Plant Systems

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Characterization
3.7.2 LA.3	4.7.1.5.b.1	CTS 4.7.1.5.b.1 details the method for operating the UHS cooling tower fans (i.e., from the control room). These details are not included in the ITS. The detailed methods for performing this Surveillance are moved to the Bases for ITS SR 3.7.2.3.	Bases	ITS 5.5.10	Relocation of details concerning methodology for meeting requirements.
3.7.2 LA.4	4.7.1.5.c	CTS 4.7.1.5.c specifies performing the cross-connect valve cycle verification once per 92 days. ITS Specification 3.7.2 does not require a specific valve cycling test; rather ITS 5.5.6, Inservice Testing Program, generically encompasses all required valve cycling. This is acceptable because the CTS frequency is based on inservice test (IST) program requirements and will change based on any approved changes to that program. Therefore, this information will be defined and controlled in the IST Program.	IST Program	ITS Section 5.5 Programs and 10 CFR 50.55a	Relocation of details concerning methodology for meeting requirements.
3.7.2 LA.5	3.7.1.5.f	CTS 3.7.1.5.f requires each UHS reservoir to be maintained $\geq 41^{\circ}\text{F}$, and CTS 3.7.1.5 Action f provides actions to be taken when temperature is below this limit. These limitations and actions will be relocated to the Fermi-2 Technical Requirements Manual (TRM). The relocation of these requirement will have no impact on safety because the requirements related to preventative measures and the requirement to maintain the equipment operable remains.	TRM	10 CFR 50.59	Relocation of details concerning methodology for meeting requirements.

Table LA - Details Relocated from Current Technical Specification
ITS Section 3.7, Plant Systems

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Characterization
3.7.2 LA.6	4.7.1.2.b and 4.7.1.3.b	CTS 4.7.1.2.b and 4.7.1.3.b provide certain explicit details of the 18-month system functional test that are relocated to the Bases. These details include the verification that "each automatic valve servicing non-safety-related equipment actuates to its isolation position and the associated EECW pump automatically starts" and the verification that "the EESW pump automatically starts." ITS SR 3.7.2.5 simply requires that "each EECW/EESW subsystem actuates." Relocation of these details will not impact the requirement for the subsystem function to be satisfactorily demonstrated. This is acceptable because these details do not impact the requirement to maintain the equipment Operable and the ITS definition for Operability ensures that all equipment required to maintain Operability is functioning. These details can be adequately defined and controlled in the Bases.	Bases	ITS 5.5.10	Relocation of details concerning methodology for meeting requirements.
3.7.2, Control Room Emergency Filtration (CREF) System					
3.7.3 LA.1	3.7.2	CTS 3.7.2 requires the CREF system to be Operable and identifies what components are required for the CREF system. ITS 3.7.3 requires the CREF system to be Operable, but does not define what equipment is required. This is acceptable because these details do not impact the ITS requirement to maintain the CREF system Operable. Therefore, this information will be adequately defined and controlled in the ITS Bases.	Bases	ITS 5.5.10	Relocation of system design details.
3.7.3 LA.2	4.7.2.1.b.1, 4.7.2.1.e.2, 4.7.2.1.h, and 4.7.2.2	Certain CTS 4.7.2.1 and 4.7.2.2 provide details for performing Surveillances that are not included in the ITS. These detailed methods for performing Surveillances will be moved to the Bases and Technical Requirement Manual (TRM).	Bases TRM	ITS 5.5.10 10 CFR 50.59	Relocation of testing details.

Table LA - Details Relocated from Current Technical Specifications
ITS Section 3.7, Plant Systems

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Characterization
3.7.4, Control Center Air Conditioning (AC) System					
3.7.4 LA.1	3.7.2 Action a and SR 4.7.2.1.a	CTS 3.7.2 Action a and CTS SR 4.7.2.1.a requirements will be relocated to the ITS Bases and Technical Requirements Manual (TRM). This is acceptable because these details do not impact the ITS requirement to maintain the Control Center AC system Operable. Therefore, this information can be adequately defined and controlled in the ITS Bases and TRM.	Bases TRM	ITS 5.5.10 10 CFR 50.59	Relocation of testing details.
3.7.4 LA.2	3.7.2	CTS 3.7.2 (LCO and Action b.1) requires the Control Center AC system to be Operable and identifies what components are required for the Control Center AC system. ITS 3.7.4 requires the Control Center AC system to be Operable, but does not define what equipment is required. This is acceptable because these details do not impact the ITS requirement to maintain the Control Center AC system Operable. Therefore, this information will be adequately defined and controlled in the ITS Bases.	Bases	ITS 5.5.10	Relocation of system design details.

Table LA - Details Relocated from Current Technical Specification ;
ITS Section 3.7, Plant Systems

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Characterization
3.7.5, Main Condenser Offgas					
3.7.5 LA.1	4.11.2.7.2 and Table 4.4.5-1 Item 5	CTS 4.11.2.7.2 and CTS Table 4.4.5-1 Item 5 requires that gross radioactivity rate is maintained within limits, in addition to detailing methods for performing this Surveillance, and methods for determining when an increase has occurred. ITS 3.7.5 requires that the gross radioactivity rate is maintained within limits, but does not define the details relating to the specific radioisotopes monitored, methods for performing the surveillance, and methods for determining when an increase has occurred. This is acceptable because these requirements do not impact the ITS requirement to maintain the gross radioactivity rate within limits. Therefore, this information/requirement will be adequately defined and controlled in the ITS Bases.	Bases	ITS 5.5.10	Relocation of details concerning methodology for meeting requirements.
3.7.5 LA.2	4.11.2.7.1	CTS 4.11.2.7.1 Surveillance Requirement has been moved to the Offsite Dose Calculation Manual (ODCM) consistent with the direction provided in Generic Letter 89-01. This requirement can be adequately defined and controlled in documents which require change control in accordance with ITS 5.5.1.	ODCM	ITS 5.5.1	Relocation of details concerning methodology for meeting requirements.

Table LA - Details Relocated from Current Technical Specifications
ITS Section 3.7, Plant Systems

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Characterization
3.7.6, Main Turbine Bypass System					
3.7.6 LA.1	4.7.9.b.1	CTS 4.7.9.b.1 requires the performance of a system functional test and defines how the surveillance test is to be performed. ITS SR 3.7.6.2 requires the performance of a system functional test, but does not identify how the surveillance is to be performed. This is acceptable because the methods of performing the surveillance do not impact the requirement to perform the surveillance. Therefore, this information will be adequately defined and controlled in ITS Bases.	Bases	ITS 5.5.10	Relocation of details concerning methodology for meeting requirements.
3.7.6 LA.2	4.7.9.b.2	CTS 4.7.9.b.2 requires the performance of response time testing and defines the acceptance criteria for response times. ITS SR 3.7.6.3 requires the performance of response time testing, but does not define the acceptance requirements. This acceptance criteria is relocated to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	Relocation of testing details.
3.7.6 LA.3	3.2.3 Action a	CTS 3.2.3 Action a requires operators to "initiate corrective action within 15 minutes." ITS 3.7.6, Action A, maintains the 2 hour completion time currently allowed to restore MCPR to within limits, but does not include the requirement to initiate action within 15 minutes. This is acceptable because the requirement to restore MCPR is maintained and the time requirement to initiate action does not impact the requirement to restore MCPR. Therefore, the requirement to initiate prompt action will be adequately controlled in the ITS Bases.	Bases	ITS 5.5.10	Relocation of details concerning methodology for meeting requirements.

Table LA - Details Relocated from Current Technical Specifications
ITS Section 3.7, Plant Systems

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Characterization
3.7.7, Spent Fuel Storage Pool Water Level					
3.7.7 LA.1	3.9.9	CTS 3.9.9 water level limit applies to crane operations with loads in the spent fuel storage pool area, while there are spent fuel assemblies in the spent fuel storage pool. In the event this level is not met, CTS 3.9.9 Action requires the suspension of "crane operations with loads." ITS 3.7.7 does not require the Applicability of crane operations and the suspension of crane operations with loads. This is acceptable because suspension of crane operation does not impact the ITS Applicability for fuel movement and requirement to suspend fuel movement. Furthermore, crane operations will be addressed in the UFSAR. Therefore, this requirement can be adequately defined and controlled in the UFSAR.	UFSAR	10 CFR 50.59	Relocation of details concerning methodology for meeting requirements.
3.7.7 LA.2	3.9.9	CTS 3.9.9 Action requires movement of irradiated fuel to be suspended and require fuel assemblies to be placed in a safe condition. ITS 3.7.7 Actions requires movement of irradiated fuel to be suspended, but does not specify where fuel assemblies being moved should be placed. This is acceptable because the movement of the fuel to a safe position is considered an acceptable and prudent step in the requirement to suspend fuel movement. Therefore, this requirement will be adequately defined and controlled in ITS Bases.	Bases	10 CFR 50.59	Relocation of details concerning methodology for meeting requirements.

Table LA - Details Relocated from Current Technical Specification:
ITS Section 3.7, Plant Systems

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Characterization
3.7.8, EDGSW System					
3.7.8 LA.1	3.7.1.4	CTS 3.7.1.4 includes details relating to system design, function, and Operability for the EDG Cooling Water System. ITS 3.7.8 includes only a requirement for EDGSW Operability and does not include the details of subsystem design and specific Operability requirements. This is acceptable because these details do not impact the requirement to maintain the EDG or EDGSW System Operable and the ITS definition for Operability ensures that all equipment required to maintain Operability is functioning. These details will be adequately defined and controlled in the Bases.	Bases	10 CFR 50.59	Relocation of system design details.

Table M - More Restrictive Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.6.1.1, Primary Containment			
3.6.1.1 M.1	CTS 3.6.1.2 and 3.6.2.1 Actions for primary containment and drywell-to-suppression chamber leakage above established limits only restrict reactor coolant heatup beyond 200°F (which would allow a startup and control rod withdrawal from cold conditions, i.e., < 200°F). Furthermore, if primary containment leakage or drywell-to-suppression chamber above established limits were discovered while operating, the CTS Actions are non-specific as to the appropriate required actions. One interpretation would be to consider Primary Containment Integrity not met and enter the 1-hour Action of CTS 3.6.1.1. Under the same conditions, ITS LCO 3.0.4 will not allow a reactor startup to commence with containment leakage outside limits; just as CTS requires. However, a restriction is added by ITS 3.6.1.1 Action B to require a plant shutdown to Mode 4, if leakage rates are discovered outside established limits and cannot be corrected within the times provided in ITS Action A. The 1-hour Completion Time provided in ITS Action A presents a restriction beyond CTS requirements (or consistent with the above mentioned interpretation). While ITS 3.6.1.1 is potentially more restrictive, it provides appropriate Actions, commensurate with the type of leakage failure experienced, to ensure the plant is placed in a configuration consistent with the design basis. Therefore, this change will result in an improvement in plant safety and has no negative impact on safety.	3.6.1.1 Action A	3.6.1.2 Actions 3.6.2.1 Actions
3.6.1.1 M.2	CTS 3.6.1.5, Action, allows 24 hours to restore structural integrity to within limits. ITS 3.6.1.1 presents the primary containment structural integrity requirements in the Primary Containment LCO, which provides an allowed Completion Time of 1 hour when structural conditions are not in compliance with requirements. This conservatively brings the allowed times for restoration for a loss of containment structural integrity into agreement with a loss of containment Operability. Furthermore, the potential confusion in applying the appropriate restoration time is eliminated. This is a more restrictive change with no negative impact on safety.	3.6.1.1 Action A	3.6.1.5 Action

Table M - More Restrictive Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.6.1.2, Primary Containment Air Lock			
None			
3.6.1.3, Primary Containment Isolation Valves (PCIVs)			
3.6.1.3 M.1	CTS 4.6.1.1.b.2 requires verification of valve position for valves located within high radiation areas "during each Cold Shutdown if not performed within the previous 31 days." ITS SR 3.6.1.3.2 requires a verification every 31 days, but allows the verification to be "by administrative means" for those valves located in high radiation areas (i.e., Note 1 to SR 3.6.1.3.2). Since the high radiation area is a controlled access area, and each closed valve is also administratively controlled, the 31-day verification could consist of an on-paper verification that the position of those valves has not changed. This represents an increased surveillance frequency since the ITS will not allow deferral of all verification until the next Cold Shutdown, and as such, is a more restrictive change, with no negative impact on safety.	SR 3.6.1.3.2	4.6.1.1.b.2
3.6.1.3 M.2	CTS 3.6.1.2 Actions for primary containment leakage above established limits only restrict reactor coolant heatup beyond 200°F (which would allow a startup and control rod withdrawal from cold conditions, i.e., < 200°F). Furthermore, if primary containment leakage above established limits were discovered while operating, the CTS Actions are non-specific as to the appropriate required actions. Under the same conditions, ITS LCO 3.0.4 will not allow a reactor startup to commence with containment leakage outside limits; just as CTS requires. However, a restriction is added by ITS 3.6.1.3 Action E to require a plant shutdown to Mode 4, if leakage rates are discovered outside established limits and cannot be corrected within the times provided in ITS Action D.	3.6.1.3 Action E	3.6.1.2 Actions

Table M - More Restrictive Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.6.1.3 M.3	CTS 3.6.3 Applicability for PCIVs only include Modes 1, 2, and 3. ITS 3.6.1.3 adds an Applicability (When associated instrumentation is required to be Operable per ITS LCO 3.3.6.1, "Primary Containment Isolation Instrumentation") which effectively adds a Mode 4 and 5 requirement to the RHR Shutdown Cooling System isolation valves. Also, ITS 3.6.1.3 Action F provides appropriate actions when these valves cannot be isolated or restored to Operable within the applicable Completion Time, while the unit is in Mode 4 or 5. This change is more restrictive on plant operation, since it adds Operability requirements for Mode 4 and 5 that do not exist in CTS.	3.6.1.3, Applicability 3.6.1.3 Action F	3.6.3 Applicability
3.6.1.3 M.4	CTS does not include requirements for secondary containment bypass leakage paths. However, UFSAR Section 6.2.1.2.2.3 describes these paths and the associated leakage requirements. ITS 3.6.1.3 Action D and SR 3.6.1.3.11 are included, as more restrictive requirements, to address this issue.	SR 3.6.1.3.11 3.6.1.3 Action D	NA
3.6.1.4, Primary Containment Pressure			
None			
3.6.1.5, Drywell Air Temperature			
None			
3.6.1.6, Low-Low Set (LLS) Valves			
None			

Table M - More Restrictive Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.6.1.7, Reactor Building-to-Suppression Chamber Vacuum Breakers			
3.6.1.7 M.1	CTS 3.6.4.2, Action a, reflects a condition where the vacuum breaker is inoperable for opening, allowing 72 hours to restore it to operable status. However, the CTS Action also includes an explicit "but is known to be closed" condition, which results in deferring the beginning of the 72 hour allowance if the vacuum breaker is not full closed when it is discovered that it will not open. This deferral could be up to 2 additional hours (CTS Action b requires any open vacuum breaker to be closed within 2 hours). ITS 3.6.1.7 Action C does not explicitly include a check of whether the vacuum breaker is known to be closed; and therefore, its Required Action to restore the vacuum breaker within 72 hours is not delayed pending closure of the vacuum breaker. This results in the ITS being more restrictive by up to 2 hours. The added conservatism presents no negative impact on safety.	3.6.1.7 Action C	3.6.4.2, Action a
3.6.1.8, Suppression-Chamber-to-Drywell-Vacuum Breakers			
None			
3.6.1.9, Main Steam Isolation Valve (MSIV) Leakage Control System (LCS)			
None			

Table M - More Restrictive Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.6.2.1, Suppression Pool Average Temperature			
3.6.2.1 M.1	CTS 3.6.2.1, Action b.2, requires a reactor scram if average pool temperature is > 110°F, and Action b.3 requires depressurizing the reactor to 200 psig if average pool temperature > 120°F. With these actions completed, the reactor remains in Mode 3 with no further action required. ITS Required Actions D.3 and E.2 are provided to require continuation of the plant shutdown to Mode 4. This more restrictive change is acceptable because it does not introduce any unanalyzed operation, while requiring an appropriate conservative response.	3.6.2.1 Required Actions D.3 and E.2	3.6.2.1, Action b.2,
3.6.2.2, Suppression Pool Water Level			
None			
3.6.2.3, Residual Heat Removal (RHR) Suppression Pool Cooling			
3.6.2.3 M.1	CTS 3.6.2.3, footnote "a" to Action b, states that "Whenever both RHR subsystems are inoperable, if unable to attain COLD SHUTDOWN as required by this ACTION, maintain reactor coolant temperature as low as practical by the use of alternate heat removal methods." This footnote is deleted because it does not establish any additional restrictions on plant operation. Furthermore, the footnote is interpreted as a relaxation of the requirement to achieve Cold Shutdown. Elimination of this relaxation is a more restrictive change with no impact on safety.	None	3.6.2.3, footnote "a" to Action b

Table M - More Restrictive Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.6.2.4, Residual Heat Removal (RHR) Suppression Pool Spray			
3.6.2.4 M.1	CTS 3.6.2.2, footnote "*" to Action b, states that "Whenever both RHR subsystems are inoperable, if unable to attain COLD SHUTDOWN as required by this ACTION, maintain reactor coolant temperature as low as practical by the use of alternate heat removal methods." This footnote is deleted because it does not establish any additional restrictions on plant operation. Furthermore, the footnote is interpreted as a relaxation of the requirement to achieve Cold Shutdown. Elimination of this relaxation is a more restrictive change with no impact on safety.	None	3.6.2.2, footnote "*" to Action b
3.6.3.1, Primary Containment Hydrogen Recombiners			
None			
3.6.3.2, Primary Containment Oxygen Concentration			
None			
3.6.4.1, Secondary Containment			
3.6.4.1 M.1	CTS 4.6.5.1.d requires that one SGT subsystem be tested every eighteen months to show it can draw down secondary containment to a vacuum and that vacuum can be maintained; and could be viewed to allow use of the same subsystem each 18-month test. The ITS also requires this 18 month verification using one SGT subsystem, however, the ITS is specific in requiring that the two subsystems be alternated each 18-month test (i.e., on a Staggered Test Basis).	SR 3.6.4.1.5	4.6.5.1.d

Table M - More Restrictive Changes to Current Technical Specifications
ITS Section 3.6, Containment Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.6.4.2, Secondary Containment Isolation Valves (SCIVs)			
None			
3.6.4.3, Standby Gas Treatment (SGT) System			
None			

Table M - More Restrictive Changes to Current Technical Specifications
ITS Section 3.7, Plant Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.7.1, Residual Heat Removal Service Water (RHRSW) System			
None			
3.7.2, EECW / EESW System and UHS			
None			
3.7.3, Control Room Emergency Filtration (CREF) System			
None			
3.7.4, Control Center Air Conditioning (AC) System			
3.7.4 M.1	With the addition of the new Control Center AC system Specification, an appropriate Surveillance Requirement (SR 3.7.4.1) is added. This new Control Center AC System Surveillance replaces the current Surveillance to verify control room temperature is $\leq 95^{\circ}\text{F}$. The reality of operating with the control room at 95°F , without undertaking actions to lower the temperature, is not plausible. If temperature can not be lowered, the chillers would obviously be declared inoperable. The efforts to maintain temperature much lower than 95°F , with or without an explicit Surveillance, will always be more restrictive than the CTS surveillance implies. ITS SR 3.7.4.1 ensures the chillers will be declared inoperable when they are incapable of removing the assumed heat load. This change is consistent with the BWR Standard Technical Specifications, NUREG-1433 and is considered more restrictive on plant operations.	SR 3.7.4.1	N/A

Table M - More Restrictive Changes to Current Technical Specifications
ITS Section 3.7, Plant Systems

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.7.5, Main Condenser Offgas			
3.7.5 M.1	CTS 4.11.2.7.2.b requires determination of gross radioactivity following an increase in offgas activity. In ITS SR 3.7.5.2, the amount of increase of offgas radiation before sampling is required, is changed from the CTS requirement of "greater than 50%" to include an increase equivalent to 50%. This change is more restrictive since technically it increases the range of releases to be considered. However, no additional performances of the Surveillance would be expected since the increase is insignificant.	SR 3.7.5.2	4.11.2.7.2.b
3.7.6, Main Turbine Bypass System			
None			
3.7.7, Spent Fuel Storage Pool Water Level			
None			
3.7.8, EDGSW System			
None			