

ATTACHMENT 4

Point Beach Units 1 and 2
License Amendment Request to Revise Technical Specifications
to Adopt Risk Informed Completion Times TSTF-505, Revision 2,
“Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4b”

Cross-Reference of TSTF-505, Revision 2, and Point Beach Proposed Changes

Cross-Reference of TSTF-505, Revision 2, and Point Beach Proposed Changes

| TSTF Section 3.3.1, Table 3.3.1-1 RTS Instrumentation Functional Units (FUs) | TSTF FU # | TSTF Applicable Condition | TSTF Allow RICT? | PB FU # | PB Applicable Condition | PB Request RICT? | Comments |
|--|--------------|---------------------------------|------------------------|------------|-------------------------------|------------------------|---|
| Manual Rx Trip (Modes 1,2) | FU1 | Condition B | Yes | FU1 | Condition B | Yes | Administrative variation (Section 2.4.1.6) - TSTF splits Condition B into B and Z; LAR splits Condition B into B and Y. |
| Manual Rx Trip (Modes 3, 4, 5) | FU1 | Condition C | Yes | FU1 | Condition C | No | NA |
| Power Range Neutron Flux - High | FU2a | Condition D | Yes | FU2a | Condition D | Yes | Plant-specific variation (Section 2.4.2) - PB Action D.1 requires placing channel in trip; TSTF Action D.1 requires placing channel in trip and either THERMAL POWER reduction or SR 3.2.4.2 performance. Administrative variation (Section 2.4.1.6) - TSTF splits Condition D into D and Z; LAR splits Condition D into D and Y. Administrative variation (Section 2.4.1.7) - PB Condition D has 1-hr CT vs. TSTF Condition D 72-hr CT. |
| Power Range Neutron Flux - Low | FU2b | Condition E | Yes | FU2b | Condition D | Yes | Administrative variation (Section 2.4.1.6) - TSTF splits Condition E into E and Z; LAR splits Condition D into D and Y. Administrative variation (Section 2.4.1.7) - PB Condition D has 1-hr CT vs. TSTF Condition D 72-hr CT. |
| Power Range Neutron Flux Rate, High Positive Rate | FU3a | Condition E | Yes | --- | --- | --- | NA |
| Power Range Neutron Flux Rate, High Negative Rate | FU3b | Condition E | Yes | --- | --- | --- | NA |
| Intermediate Range Neutron Flux | FU4 | Condition F, G | No | FU3 | Condition F, G | No | NA |
| Source Range Neutron Flux (Mode 2) | FU5 | Condition H, I | No | FU4 | Condition H, I | No | NA |
| Source Range Neutron Flux (Modes 3, 4, 5) | FU5 | Condition I, J | Yes* | FU4 | Condition I, J | No | *TSTF allows RICT for Condition J only. |
| Overtemperature ΔT | FU6 | Condition E | Yes | FU5 | Condition D | Yes | Administrative variation (Section 2.4.1.6) - TSTF splits Condition E into E and Z; LAR splits Condition D into D and Y. Administrative variation (Section 2.4.1.7) - PB Condition D has 1-hr CT vs. TSTF Condition E 72-hr C |

Cross-Reference of TSTF-505, Revision 2, and Point Beach Proposed Changes

| TSTF Section 3.3.1, Table 3.3.1-1 RTS Instrumentation Functional Units (FUs) | TSTF FU # | TSTF Applicable Condition | TSTF Allow RICT? | PB FU # | PB Applicable Condition | PB Request RICT? | Comments |
|--|--------------|---------------------------------|------------------------|------------|-------------------------------|------------------------|--|
| Overpower ΔT | FU7 | Condition E | Yes | FU6 | Condition D | Yes | Administrative variation (Section 2.4.1.6) - TSTF splits Condition E into E and Z; LAR splits Condition D into D and Y. Administrative variation (Section 2.4.1.7) - PB Condition D has 1-hr CT vs. TSTF Condition E 72-hr CT. |
| Pressurizer Pressure - Low | FU8a | Condition L | Yes | FU7a | Condition K | Yes | Administrative variation (Section 2.4.1.6) - TSTF splits Condition L into L and M; LAR splits PB Condition K into K and Z Administrative variation (Section 2.4.1.7) - PB Condition K has 1-hr CT vs. TSTF Condition L 72-hr CT. |
| Pressurizer Pressure - High | FU8b | Condition E | Yes | FU7b | Condition D | Yes | Administrative variation (Section 2.4.1.6) - TSTF splits Condition E into E and Z; LAR splits Condition D into D and Y. Administrative variation (Section 2.4.1.7) - PB Condition D has 1-hr CT vs. TSTF Condition E 72-hr CT. |
| Pressurizer Water Level - High | FU9 | Condition L | Yes | FU8 | Condition K | Yes | Administrative variation (Section 2.4.1.6) - TSTF splits Condition L into L and M; LAR splits PB Condition K into K and Z Administrative variation (Section 2.4.1.7) - PB Condition K has 1-hr CT vs. TSTF Condition L 72-hr CT. |
| Reactor Coolant Flow - Low | FU10 | Condition L | Yes | --- | --- | --- | NA |
| Reactor Coolant Flow - Low (single loop) | --- | --- | --- | FU9a | Condition L | Yes | Plant-specific variations (Section 2.4.2) - TSTF doesn't specify number of RCS loops; STS Bases, Condition L applies to "one or more" RCS loops. - TSTF splits Condition L into L and M where Condition M requires power reduction to <P-7 within 6-hours. LAR splits Condition L into L and AA where Condition AA requires power reduction to <P-8 within 4-hours. Administrative variation (Section 2.4.1.7) - PB Condition L has 1-hr CT vs. TSTF Condition L 72-hr CT. |

Cross-Reference of TSTF-505, Revision 2, and Point Beach Proposed Changes

| TSTF Section 3.3.1, Table 3.3.1-1 RTS Instrumentation Functional Units (FUs) | TSTF FU # | TSTF Applicable Condition | TSTF Allow RICT? | PB FU # | PB Applicable Condition | PB Request RICT? | Comments |
|--|--------------|---------------------------------|------------------------|------------|-------------------------------|------------------------|--|
| Reactor Coolant Flow - Low (Two loops) | --- | --- | --- | FU9b | Condition K | Yes | Plant-specific variations (Section 2.4.2) - TSTF doesn't specify number of RCS loops, but per STS Bases, Condition L applies to "one or more" RCS loops. Administrative variation (Section 2.4.1.6) - TSTF splits Condition L into L and M; LAR splits PB Condition K into K and Z Administrative variation (Section 2.4.1.7) - PB Condition K has 1-hr CT vs. TSTF Condition L 72-hr CT. |
| RCP breaker position one loop | FU11a | Condition N | Yes | FU10a | Condition M | Yes | Administrative variation (Section 2.4.1.6) - TSTF splits Condition N into N and O; LAR splits PB Condition M into M and AA. |
| RCP breaker position 2 loops | FU11b | Condition P | Yes | FU10b | Condition N | Yes | Administrative variation (Section 2.4.1.5) - TSTF Condition P places channel in trip; PB Condition N restores channel operability. Administrative variation (Section 2.4.1.6) - TSTF splits Condition P into P and Q; LAR splits PB Condition N into N and Z. |
| Undervoltage RCPs | FU12 | Condition L | Yes | --- | --- | --- | NA |
| Underfrequency RCPs | FU13 | Condition L | Yes | --- | --- | --- | NA |
| Undervoltage Bus A01, A02 | --- | --- | --- | FU11 | Condition K | Yes | Administrative variation (Section 2.4.1.5) - Assumes PB FU11 same as TSTF FU12 Administrative variation (Section 2.4.1.6) - TSTF splits Condition L into L and M; LAR splits PB Condition K into K and Z. Administrative variation (Section 2.4.1.7) - PB Condition K has 1-hr CT vs. TSTF Condition L 72-hr CT. |
| Underfrequency Bus A01, A02 | --- | --- | --- | FU12 | Condition E | Yes | Administrative variations (Section 2.4.1.5) - Assumes PB FU12 same as TSTF FU13. Administrative variation (Section 2.4.1.6) - TSTF splits Condition L into L and M; LAR splits PB Condition E into E and Z. Administrative variation (Section 2.4.1.7) - PB Condition E has 6-hr CT vs. TSTF Condition L 72-hr CT |

Cross-Reference of TSTF-505, Revision 2, and Point Beach Proposed Changes

| TSTF Section 3.3.1, Table 3.3.1-1 RTS Instrumentation Functional Units (FUs) | TSTF FU # | TSTF Applicable Condition | TSTF Allow RICT? | PB FU # | PB Applicable Condition | PB Request RICT? | Comments |
|--|--------------|---------------------------------|------------------------|------------|-------------------------------|------------------------|--|
| SG Water Level Low-Low | FU14 | Condition E | Yes | FU13 | Condition D | Yes | Administrative variation (Section 2.4.1.6) - TSTF splits Condition E into E and Z; LAR splits Condition D into D and Y. Administrative variation (Section 2.4.1.7) - PB Condition D has 1-hr CT vs. TSTF Condition E 72-hr CT. |
| SG Water Level Low; Coincident w/ SteamFlow/FeedFlow Mismatch | FU15 | Condition E | Yes | FU14 | Condition D | Yes | Administrative variation (Section 2.4.1.6) - TSTF splits Condition E into E and Z; LAR splits Condition D into D and Y. Administrative variation (Section 2.4.1.7) - PB Condition D has 1-hr CT vs. TSTF Condition E 72-hr CT. |
| Turbine trip on low oil pressure | FU16a | Condition R | Yes | FU15a | Condition O | Yes | Administrative variation (Section 2.4.1.6) - TSTF splits Condition R into R and S; LAR splits Condition O into O and BB. Administrative variation (Section 2.4.1.7) - PB Condition O has 1-hr CT vs. TSTF Condition R 72-hr CT. |
| Turbine trip on stop valve closure | FU16b | Condition R | Yes | FU15b | Condition O | Yes | Administrative variation (Section 2.4.1.6) - TSTF splits Condition R into R and S; LAR splits Condition O into O and BB. Administrative variation (Section 2.4.1.7) - PB Condition O has 1-hr CT vs. TSTF Condition R 72-hr CT. |
| SI input from ESFAS | FU17 | Condition T | Yes | FU16 | Condition P | Yes | Administrative variation (Section 2.4.1.6) - TSTF splits Condition T into T and Z; LAR splits Condition P into P and Y. Administrative variation (Section 2.4.1.7) - PB Condition P has 6-hr CT vs. TSTF Condition T 24-hr CT. |
| Rx Trip Interlocks intermediate range neutron flux (P6) | FU18a | Condition V | No | FU17a | Condition R | No | NA |
| Rx Trip Interlock low power Rx trip block (P7) | FU18b | Condition W | No | --- | --- | --- | NA |
| Rx Trip Interlock low power Rx trip block power range neutron flux (P7) | --- | --- | --- | FU17b (1) | Condition S | No | NA |

Cross-Reference of TSTF-505, Revision 2, and Point Beach Proposed Changes

| TSTF Section 3.3.1, Table 3.3.1-1 RTS Instrumentation Functional Units (FUs) | TSTF FU # | TSTF Applicable Condition | TSTF Allow RICT? | PB FU # | PB Applicable Condition | PB Request RICT? | Comments |
|--|--------------|---------------------------------|------------------------|------------|-------------------------------|------------------------|---|
| Rx Trip Interlock low power Rx trip block turbine first stage pressure | --- | --- | --- | FU17b (2) | Condition S | No | NA |
| Rx Trip Interlocks power range neutron flux (P8) | FU18c | Condition W | No | FU17c | Condition S | No | NA |
| Rx Trip Interlocks power range neutron flux (P9) | FU18d | Condition W | No | FU17d | Condition S | No | NA |
| Rx Trip Interlocks power range neutron flux (P10) | FU18e | Condition V | No | FU17e | Condition R | No | NA |
| Rx Trip Interlocks turbine impulse pressure (P13) | FU18f | Condition W | No | --- | --- | --- | NA |
| RTBs (Modes 1,2) | FU19 | Condition U | Yes | FU18 | Condition Q | Yes | Plant-specific variation (Section 2.4.2) - TSTF Condition U requires restoration of train to OPERABLE status; PB Condition Q requires restoration of RTB to OPERABLE status. Administrative variation (Section 2.4.1.6) - TSTF splits Condition U into U and Z; LAR splits Condition Q into Q and Y. |
| RTBs (Modes 3, 4, 5) | FU19 | Condition C | Yes | FU18 | Condition T | No | NA |
| RTB undervoltage and shunt trip (Modes 1, 2) | FU20 | Condition Y | Yes | FU19 | Condition U | Yes | Administrative variation (Section 2.4.1.6) - TSTF splits Condition Y into Y and Z; LAR splits Condition U into U and Y. |
| RTB undervoltage and shunt trip (Modes 3, 4, 5) | FU20 | Condition C | Yes | FU19 | Condition T | No | NA |
| Rx trip bypass breaker and undervoltage (Modes 1, 2) | --- | --- | --- | FU 20 | Condition V | No | NA |
| Rx trip bypass breaker and undervoltage (Modes 3, 4, 5) | --- | --- | --- | FU 20 | Condition W | No | NA |
| Auto trip logic (Modes 1, 2) | FU21 | Condition T | Yes | FU21 | Condition P | Yes | Administrative variation (Section 2.4.1.6) - TSTF splits Condition T into T and Z; LAR splits Condition P into P and Y. Administrative variation (Section 2.4.1.7) - PB Condition P has 6-hr CT vs. TSTF Condition T 24-hr CT. |
| Auto trip logic (Modes 3, 4, 5) | FU21 | Condition C | Yes | FU21 | Condition X | No | NA |

Cross-Reference of TSTF-505, Revision 2, and Point Beach Proposed Changes

| TSTF Section 3.3.2, Table 3.3.2-1 ESFAS Instrumentation Functional Units (FUs) | TSTF FU # | TSTF Applicable Condition | TSTF Allow RICT? | PB FU # | PB Applicable Condition | PB Request RICT? | Comments |
|--|--------------|---------------------------------|------------------------|------------|-------------------------------|------------------------|---|
| FU1, Safety Injection | | | | | | | |
| Manual initiation | FU1a | Condition B | Yes | FU1a | Condition B | Yes | No variation |
| Automatic Actuation Logic and Actuation Relays | FU1b | Condition C | Yes | FU1b | Condition C | Yes | Administrative variation (Section 2.4.1.6) - TSTF splits Condition C into C and M; LAR splits Condition C into C and L. Administrative variation (Section 2.4.1.7) - PB Condition C has 6-hr CT vs. TSTF Condition C 24-hr CT. |
| Containment Pressure - High | FU1c | Condition D | Yes | FU1c | Condition D | Yes | Administrative variation (Section 2.4.1.6) - TSTF splits Condition D into D and N; LAR splits Condition D into D and M. Administrative variation (Section 2.4.1.7) - PB Condition D has 1-hr CT vs. TSTF Condition D 72-hr CT. |
| Pressurizer Pressure - Low | FU1d | Condition D | Yes | FU1d | Condition D | Yes | Administrative variation (Section 2.4.1.6) - TSTF splits Condition D into D and N; LAR splits Condition D into D and M. Administrative variation (Section 2.4.1.7) - PB Condition D has 1-hr CT vs. TSTF Condition D 72-hr CT. |
| Steam Line Pressure - Low | FU1e(1) | Condition D | Yes | FU1e | Condition D | Yes | Administrative variation (Section 2.4.1.6) - TSTF splits Condition D into D and N; LAR splits Condition D into D and M. Administrative variation (Section 2.4.1.7) - PB Condition D has 1-hr CT vs. TSTF Condition D 72-hr CT. |
| Steam Line Pressure - High ΔP between steam lines | FU1e(2) | Condition D | Yes | --- | --- | --- | NA |
| High Steam Flow in Two Lines Coincident with T_{avg} - Low,Low | FU1f | Condition D | Yes | --- | --- | --- | NA |
| High Steam Flow in Two Lines Coincident with Steam line pressure - Low | FU1g | Condition D | Yes | --- | --- | --- | NA |
| FU2, Containment Spray | | | | | | | |
| Manual initiation | FU2a | Condition B | Yes | FU2a | Condition E | No | No |

Cross-Reference of TSTF-505, Revision 2, and Point Beach Proposed Changes

| TSTF Section 3.3.2, Table 3.3.2-1 ESFAS Instrumentation Functional Units (FUs) | TSTF FU # | TSTF Applicable Condition | TSTF Allow RICT? | PB FU # | PB Applicable Condition | PB Request RICT? | Comments |
|---|----------------------|--|---------------------------------|--------------------|--|---------------------------------|---|
| Automatic Actuation Logic and Actuation Relays | FU2b | Condition C | Yes | FU2b | Condition C | No | Note added to Condition C prohibiting RICT for FU2b. |
| Containment Pressure High 3 (High High) | FU2c | Condition E | No | FU2c | Condition D | No | Note added to Condition D prohibiting RICT for FU2c. |
| Containment Pressure High 3 (Two loop plants) | FU2d | Condition E | No | --- | --- | --- | NA |
| FU3, Containment Isolation | | | | | | | |
| Phase A Isolation - Manual Initiation | FU3a1 | Condition B | Yes | FU3a | Condition B | Yes | Administrative variation (Section 2.4.1.5) - PB Condition does not distinguish Phase A vs. B. Administrative variation (Section 2.4.1.6) - TSTF splits Condition B into B and M; LAR splits Condition B into B and L. |
| Phase A Isolation - Automatic Actuation Logic and Actuation Relays | FU3a2 | Condition C | Yes | FU3b | Condition C | Yes | Administrative variation (Section 2.4.1.5) - PB Condition does not distinguish Phase A vs. B. Administrative variation (Section 2.4.1.6) - TSTF splits Condition C into C and M; LAR splits Condition C into C and L. |
| Phase A Isolation - Safety Injection | FU3a3 | Refers to FU1 | NA | FU3c | Refers to FU1 | NA | NA |
| Phase B Isolation - Manual Initiation | FU3b1 | Condition B | Yes | --- | --- | --- | NA |
| Phase B Isolation - Automatic Actuation Logic and Actuation Relays | FU3b2 | Condition C | Yes | --- | --- | --- | NA |
| Phase B Isolation - Containment Pressure High - 3 (High High) | FU3b3 | Condition E | No | --- | --- | --- | NA |
| FU 4, Steam Line Isolation | | | | | | | |
| Manual initiation | FU4a | Condition F | Yes | FU4a | Condition F | Yes | Administrative variation (Section 2.4.1.6) - TSTF splits Condition F into F and N; LAR splits Condition F into F and M. Administrative variation (Section 2.4.1.7) - PB Condition F has 1-hr CT vs. TSTF Condition F 48-hr CT. |
| Automatic Actuation Logic and Actuation Relays | FU4b | Condition G | Yes | FU4b | Condition G | Yes | Administrative variation (Section 2.4.1.6) - TSTF splits Condition G into G and N; LAR splits Condition G into G and M. Administrative variation (Section 2.4.1.7) |

Cross-Reference of TSTF-505, Revision 2, and Point Beach Proposed Changes

| TSTF Section 3.3.2, Table 3.3.2-1 ESFAS Instrumentation Functional Units (FUs) | TSTF FU # | TSTF Applicable Condition | TSTF Allow RICT? | PB FU # | PB Applicable Condition | PB Request RICT? | Comments |
|--|--------------|---------------------------------|------------------------|------------|-------------------------------|------------------------|---|
| | | | | | | | - PB Condition G has 6-hr CT vs. TSTF Condition G 24-hr CT. |
| Containment Pressure - High 2 | FU4c | Condition D | Yes | FU4c | Condition D | Yes | Administrative variation (Section 2.4.1.5) - Containment Pressure - High, High versus TSTF "High 2". Administrative variation (Section 2.4.1.6) - TSTF splits Condition D into D and N; LAR splits Condition D into D and M. Administrative variation (Section 2.4.1.7) - PB Condition D has 1-hr CT vs. TSTF Condition D 72-hr CT. |
| Steam Line Pressure - Low | FU4d(1) | Condition D | Yes | --- | --- | --- | NA |
| Steam Line Pressure - Negative Rate High | FU4d(2) | Condition D | Yes | --- | --- | --- | NA |
| High Steam Flow in Two Steam Lines; Coincident with T _{avg} - Low, Low | FU4e | Condition D | Yes | --- | --- | --- | NA |
| High Steam Flow in Two Steam Lines; Coincident with Steam Line Pressure - Low | FU4f | Condition D | Yes | --- | --- | --- | NA |
| High Steam Flow Coincident with Safety Injection and Coincident with T _{avg} - Low, Low | FU4g | Condition D | Yes | FU4d | Condition D | Yes | Administrative variation (Section 2.4.1.5) - Coincident with T _{avg} Low vs. TSTF T _{avg} "Low, Low". Administrative variation (Section 2.4.1.6) - TSTF splits Condition D into D and N; LAR splits Condition D into D and M. Administrative variation (Section 2.4.1.7) - PB Condition D has 1-hr CT vs. TSTF Condition D 72-hr CT. |
| High, High Steam Flow; Coincident with Safety Injection | FU4h | Condition D | Yes | FU4e | Condition D | Yes | Administrative variation (Section 2.4.1.6) - TSTF splits Condition D into D and N; LAR splits Condition D into D and M. Administrative variation (Section 2.4.1.7) - PB Condition D has 1-hr CT vs. TSTF Condition D 72-hr CT. |
| FU5, Feedwater Isolation | | | | | | | |
| Automatic Actuation Logic and Actuation Relays | FU5a | Condition H | Yes | FU5a | Condition G | Yes | Plant-specific variation (Section 2.4.2) - TSTF splits Condition H into H and O, where Condition O requires MODE 3 entry in 24-hours. LAR splits Condition G |

Cross-Reference of TSTF-505, Revision 2, and Point Beach Proposed Changes

| TSTF Section 3.3.2, Table 3.3.2-1 ESFAS Instrumentation Functional Units (FUs) | TSTF FU # | TSTF Applicable Condition | TSTF Allow RICT? | PB FU # | PB Applicable Condition | PB Request RICT? | Comments |
|--|--------------|---------------------------------|------------------------|------------|-------------------------------|------------------------|--|
| | | | | | | | into G and M where Condition M requires MODE 3 entry in 6-hours and MODE 4 in 12-hours. Administrative variation (Section 2.4.1.7) - PB Condition G has 6-hr CT vs. TSTF Condition H 24-hr CT |
| SG Water Level - High, High (P-14) | FU5b | Condition I | Yes | FU5b | Condition D | Yes | Plant-specific variation (Section 2.4.2) - TSTF splits Condition I into I and O, where Condition O requires MODE 3 entry in 6-hours. LAR splits Condition D into D and M where Condition M requires MODE 3 entry in 6-hours and MODE 4 in 12-hours. Administrative variation (Section 2.4.1.5) - SG water level High vs. TSTF SG water level "High, High". Administrative variation (Section 2.4.1.7) - PB Condition D has 1-hr CT vs. TSTF Condition I 72-hr CT. |
| Safety Injection | FU5c | Refers to FU1 | NA | FU5c | Refers to FU1 | NA | NA |
| FU 6, Auxiliary Feedwater | | | | | | | |
| Automatic Actuation Logic and Actuation Relays (Solid State Protection System) | FU6a | Condition G | Yes | FU6a | Condition G | Yes | Administrative variation (Section 2.4.1.5) - Does not distinguish SSPS vs. BOP ESFAS. Administrative variation (Section 2.4.1.6) - TSTF splits Condition G into G and M; LAR splits Condition G into G and M. Administrative variation (Section 2.4.1.7) - PB Condition G has 6-hr CT vs. TSTF Condition G 24-hr CT. |
| Automatic Actuation Logic and Actuation Relays (Balance of Plant ESFAS) | FU6b | Condition G | Yes | --- | --- | --- | NA |
| SG Water Level - Low, Low | FU6c | Condition D | Yes | FU6b | Condition D | Yes | Administrative variation (Section 2.4.1.6) - TSTF splits Condition D into D and N; LAR splits Condition D into D and M. Administrative variation (Section 2.4.1.7) - PB Condition D has 1-hr CT vs. TSTF Condition D 72-hr CT. |
| Safety Injection | FU6d | Refers to FU1 | NA | FU6c | Refers to FU1 | NA | NA |

Cross-Reference of TSTF-505, Revision 2, and Point Beach Proposed Changes

| TSTF Section 3.3.2, Table 3.3.2-1 ESFAS Instrumentation Functional Units (FUs) | TSTF FU # | TSTF Applicable Condition | TSTF Allow RICT? | PB FU # | PB Applicable Condition | PB Request RICT? | Comments |
|--|----------------------|--|---------------------------------|--------------------|--|---------------------------------|---|
| Loss of Offsite Power | FU6e | Condition F | Yes | --- | --- | --- | NA |
| Undervoltage Reactor Coolant Pump | FU6f | Condition I | Yes | --- | --- | --- | NA |
| Undervoltage A01 and A02 | --- | --- | --- | FU6d | Condition H | Yes | Administrative variation (Section 2.4.1.5) - TSTF LCO vs. PB LCO (i.e. RCP vs. A01 and A02). Administrative variation (Section 2.4.1.6) - TSTF for FU 6f splits Condition I into I and O; LAR splits Condition H into H and K. |
| Trip of all Main Feedwater Pumps | FU6g | Condition J | Yes | --- | --- | --- | NA |
| Auxiliary Feedwater Pump Suction Transfer on Suction Pressure - Low | FU6h | Condition F | Yes | FU6e | Condition J | No | NA |
| FU7, Automatic Switchover to Containment sump | | | | | | | |
| Automatic Actuation Logic and Actuation Relays | FU7a | Condition C | Yes | --- | --- | --- | NA |
| Refueling Water Storage Tank (RWST) Level - Low, Low; Coincident with Safety Injection | FU7b | Condition K | No | --- | --- | --- | NA |
| RWST Level Low, Low; Coincident with Safety Injection; Coincident with Containment sump level - High | FU7c | Condition K | No | --- | --- | --- | NA |
| SI Block - Pressurizer Pressure | --- | --- | --- | FU7 | Condition I | No | NA |
| FU 8, ESFAS Interlocks | | | | | | | |
| Reactor Trip, P-4 | FU8a | Condition F | Yes | --- | --- | --- | NA |
| Pressurizer Pressure, P-11 | FU8b | Condition L | No | --- | --- | --- | NA |
| T _{avg} - Low, Low P-12 | FU8c | Condition L | No | --- | --- | --- | NA |

Cross-Reference of TSTF-505, Revision 2, and Point Beach Proposed Changes

| TSTF Section 3.3.5, Loss of Power (LOP) Diesel Generator (DG) Start Instrumentation Functional Units (FUs) | TSTF FU # | TSTF Applicable Condition | TSTF Allow RICT? | PB FU # | PB Applicable Condition | PB Request RICT? | Comments |
|---|------------------|----------------------------------|-------------------------|----------------|--------------------------------|-------------------------|-----------------|
| 3 loss of voltage channels per 4.16kV bus, and 3 degraded voltage channels per 4.16kV bus | LCO 3.3.5 | Condition A | Yes | LCO 3.3.4 | Condition A | No | NA |
| 3 loss of voltage channels per 4.16kV bus 3 degraded voltage channels per 4.16kV bus | LCO 3.3.5 | Condition B | Yes | LCO 3.3.4 | Condition B | No | NA |
| 3 loss of voltage channels per 4.16kV bus 3 degraded voltage channels per 4.16kV bus | --- | --- | --- | LCO 3.3.4 | Condition D | No | NA |

| TSTF Section 3.3.9, Boron Dilution Protection System (BDPS) Instrumentation Functional Units (FUs) | TSTF FU # | TSTF Applicable Condition | TSTF Allow RICT? | PB FU # | PB Applicable Condition | PB Request RICT? | Comments |
|---|------------------|----------------------------------|-------------------------|----------------|--------------------------------|-------------------------|-----------------|
| 2 BDPS trains | LCO 3.3.9 | Condition A | Yes | --- | --- | --- | NA |
| 2 BDPS trains | LCO 3.3.9 | Condition B | No | --- | --- | --- | NA |

Cross-Reference of TSTF-505, Revision 2, and Point Beach Proposed Changes

| TSTF Section 3.4 - 3.9 Systems | TSTF Applicable Condition | TSTF Allow RICT? | PB Section 3.4 - 3.9 Systems | PB Applicable Condition | PB Request RICT? | Comments |
|--|--|------------------|--|---|------------------|----------------------|
| TS 3.4, Reactor Coolant System | | | | | | |
| <p>STS 3.4.5 (Mode 3 applicable) [Two] RCS loops shall be OPERABLE and either: a. [Two] RCS loops shall be in operation when the Rod Control System is capable of rod withdrawal or b. One RCS loop shall be in operation when the Rod Control System is not capable of rod withdrawal</p> | <p>Condition A One required loop inoperable.</p> | <p>Yes</p> | <p>TS 3.4.5 Two RCS loops shall be OPERABLE and one shall be in operation</p> | <p>Condition A One required loop inoperable.</p> | <p>No</p> | <p>NA</p> |
| <p>STS 3.4.9 The pressurizer shall be OPERABLE with: a. Pressurizer water level \leq [92]% b. Two groups of pressurizer heater OPERABLE with the capacity [of each group] $>$ [125] kW [and capable of being powered from an emergency power supply]</p> | <p>Condition B One [required] group of Pressurizer heaters inoperable</p> | <p>Yes</p> | <p>TS 3.4.9 The pressurizer shall be OPERABLE with: a. Pressurizer water level \leq 52% in MODE 1 or \leq 88 in MODES 2 and 3; and b. At least 100 kW of pressurizer heaters capable of being powered from an emergency power supply OPERABLE</p> | <p>Condition B Required Pressurizer heaters inoperable</p> | <p>No</p> | <p>NA</p> |
| <p>STS 3.4.11 Each PORV and associated block valve shall be OPERABLE</p> | <p>Condition B One [or two] PORV[s] inoperable and not capable of being manually cycled</p> | <p>Yes</p> | <p>TS 3.4.11 Each PORV and associated block valve shall be OPERABLE</p> | <p>Condition B One PORV inoperable and not capable of being manually cycled.</p> | <p>Yes</p> | <p>No variations</p> |
| <p>STS 3.4.11 Each PORV and associated block valve shall be OPERABLE</p> | <p>Condition C One [or two] block valve(s) inoperable</p> | <p>Yes</p> | <p>Same as above</p> | <p>Condition C One block valve inoperable</p> | <p>Yes</p> | <p>No variations</p> |

Cross-Reference of TSTF-505, Revision 2, and Point Beach Proposed Changes

| TSTF Section 3.4 - 3.9 Systems | TSTF Applicable Condition | TSTF Allow RICT? | PB Section 3.4 - 3.9 Systems | PB Applicable Condition | PB Request RICT? | Comments |
|--|--|------------------|--|---|------------------|--|
| TS 3.5, Emergency Core Cooling System (ECCS) | | | | | | |
| STS 3.5.2 Two ECCS trains shall be operable | Condition A One or more trains inoperable | Yes | TS 3.5.2 Two ECCS trains shall be operable | Condition A One ECCS train inoperable | Yes | No variations |
| TS 3.6, Containment Systems | | | | | | |
| STS 3.6.2 Two containment air locks shall be OPERABLE | Condition C One or more containment air locks inoperable for reasons other Condition A or B | Yes | TS 3.6.2 Two containment air locks shall be OPERABLE | Condition C One or more containment air locks inoperable for reasons other Condition A or B | Yes | Administrative variation (Section 2.4.1.7) - PB Action C.3 has 36-hr CT vs. 24-hr CT for TSTF Action C.3. |
| STS 3.6.3 Each containment isolation valve shall be OPERABLE. | Condition A One or more penetration flow paths with one containment isolation valve inoperable [for reasons other than Condition[s] D [and E] | Yes | TS 3.6.3 Each containment isolation valve shall be OPERABLE | Condition A One or more penetration flow paths with one containment isolation valve inoperable | Yes | No variations |
| Same as above | Condition C One or more penetration flow paths with one containment isolation valve inoperable | Yes | Same as above | Condition C One or more penetration flow paths with one containment isolation valve inoperable | Yes | Plant-specific variation (Section 2.4.2) - TSTF Action C.2 does not restrict to only valves outside containment the flowpath isolation verification every 31 days |

Cross-Reference of TSTF-505, Revision 2, and Point Beach Proposed Changes

| TSTF Section 3.4 - 3.9 Systems | TSTF Applicable Condition | TSTF Allow RICT? | PB Section 3.4 - 3.9 Systems | PB Applicable Condition | PB Request RICT? | Comments |
|---|---|------------------|---|--|------------------|----------|
| STS 3.6.6A* Two containment spray trains and [two] accident fan cooler units shall be OPERABLE. * Credit taken for iodine removal by the Containment Spray System | Condition A One containment spray train inoperable | Yes | TS 3.6.6 Two containment spray trains and four accident fan cooler units shall be OPERABLE | Condition A One containment spray train inoperable | No | NA |
| Same as above | Condition C One [required] containment cooling train inoperable | Yes | Same as above | Condition C One or two accident fan cooler unit(s) inoperable | No | NA |
| Same as above | Condition D Two [required] containment cooling train inoperable | Yes | --- | --- | --- | NA |
| STS 3.6.10 Two HIS trains shall be OPERABLE. | Condition A One HIS train inoperable | Yes | --- | --- | --- | NA |
| Same as above | Condition B One containment region with no OPERABLE hydrogen ignitor | Yes | --- | --- | --- | NA |
| STS 3.6.14 Two ARS trains shall be OPERABLE. | Condition A One ARS train inoperable | Yes | --- | --- | --- | NA |
| STS 3.6.16 The ice condenser inlet doors, intermediate deck doors and top deck [doors] shall be OPERABLE and closed. | Condition A One or more ice condenser inlet doors inoperable due to being physically | Yes | --- | --- | --- | NA |

Cross-Reference of TSTF-505, Revision 2, and Point Beach Proposed Changes

| TSTF Section 3.4 - 3.9 Systems | TSTF Applicable Condition | TSTF Allow RICT? | PB Section 3.4 - 3.9 Systems | PB Applicable Condition | PB Request RICT? | Comments |
|--|---|------------------|---|--|------------------|--|
| | restrained from opening | | | | | |
| Same as above | Condition B One or more ice condenser inlet doors inoperable for reasons other than Condition A or not closed. | Yes | --- | --- | --- | NA |
| STS 3.6.17 Divider barrier integrity shall be maintained. | Condition A One or more personnel access doors or equipment hatches open or inoperable, other than for personal transit entry. | Yes | --- | --- | --- | NA |
| TS 3.7, Plant Systems | | | | | | |
| STS 3.7.2 [Four] MSIVs shall be OPERABLE. | Condition A One MSIV inoperable in MODE 1 | Yes | TS 3.7.2 Two MSIVs and two non-return check valves shall be OPERABLE | Condition A One Steam Generator flowpath with one or more inoperable valves in MODE 1 | Yes | Plant specific variation (Section 2.4.2) - TSTF does not address non-return check valves. Note to be added limiting number of inoperable valves to one per SG flowpath Administrative variation (Section 2.4.1.5) - TSTF LCO vs. PB LCO administrative differences. |

Cross-Reference of TSTF-505, Revision 2, and Point Beach Proposed Changes

| TSTF Section 3.4 - 3.9 Systems | TSTF Applicable Condition | TSTF Allow RICT? | PB Section 3.4 - 3.9 Systems | PB Applicable Condition | PB Request RICT? | Comments |
|--|---|------------------|--|---|------------------|---|
| STS 3.7.4 [Three] ADV lines shall be OPERABLE. | Condition A One required ADV line inoperable | Yes | TS 3.7.4 Two ADV flowpaths shall be OPERABLE | Condition A One required ADV flowpath inoperable | Yes | Administrative variation (Section 2.4.1.5) - TSTF LCO vs. PB LCO administrative differences. |
| Same as above | Condition B Two or more required ADV lines inoperable | Yes | Same as above | Condition B Two required ADV flowpaths inoperable | No | NA |
| STS 3.7.5 [Three] AFW trains shall be OPERABLE. | Condition A Turbine driven AFW pump system inoperable due to one inoperable steam supply, OR Turbine driven AFW pump system inoperable in MODE 3 | Yes | TS 3.7.5 The AFW System shall be OPERABLE with; one turbine driven AFW pump system and one motor driven AFW pump system | Condition A Turbine driven AFW pump system inoperable due to one inoperable steam supply, OR Turbine driven AFW pump system inoperable in MODE 3 following refueling | Yes | Administrative variation (Section 2.4.1.5) - TSTF LCO vs. PB LCO administrative differences. |
| Same as above | Condition B One AFW train inoperable in MODE 1, 2 or 3 [for reasons other than Condition A] | Yes | Same as above | Condition B One AFW pump system inoperable in MODE 1, 2 or 3 for reasons | Yes | Administrative variation (Section 2.4.1.5) - TSTF LCO vs. PB LCO. |

Cross-Reference of TSTF-505, Revision 2, and Point Beach Proposed Changes

| TSTF Section 3.4 - 3.9 Systems | TSTF Applicable Condition | TSTF Allow RICT? | PB Section 3.4 - 3.9 Systems | PB Applicable Condition | PB Request RICT? | Comments |
|--|---|------------------|---|---|------------------|---|
| | | | | other than Condition A | | |
| <p>STS 3.7.7 Two CCW trains shall be OPERABLE.</p> | <p>Condition A One CC train inoperable</p> | <p>Yes</p> | <p>TS 3.7.7 The CC System shall be OPERABLE with; two CC pumps, and two required CC heat exchangers</p> | <p>Condition A One CC pump inoperable</p> | <p>Yes</p> | <p>Plant-specific variation (Section 2.4.2) - PB Condition A applies to CCW pump vs. CCW train for TSTF Condition A. Administrative variation (Section 2.4.1.8) - TSTF Action A.1 does not specify a second CT.</p> |
| <p>---</p> | <p>---</p> | <p>---</p> | <p>Same as above</p> | <p>Condition B One required CC heat exchanger inoperable</p> | <p>Yes</p> | <p>Plant-specific variations (Section 2.4.2) - PB Condition B applies to CCW Hx vs. CCW train for TSTF Condition A. Administrative variation (Section 2.4.1.8) - TSTF Action A.1 does not specify a second CT.</p> |
| <p>STS 3.7.8 Two SWS trains shall be OPERABLE</p> | <p>Condition A One SWS train inoperable</p> | <p>Yes</p> | <p>TS 3.7.8 The SW System shall be OPERABLE with:</p> <ul style="list-style-type: none"> • Six OPERABLE SW pumps • SW ring header continuous flowpath not interrupted • Required automatic non-essential-SW-load isolation valves OPERABLE or affected non-essential flowpath isolated; and • Opposite unit containment accident fan cooler unit SW outlet motor operated valves closed or SW flowpath isolated | <p>Condition A One SW pump inoperable AND Both units in MODES 1, 2, 3, or 4</p> | <p>Yes</p> | <p>Plant-specific variation (Section 2.4.2) - TSTF Condition A applies to SW train vs. PB Condition A. Administrative variation (Section 2.4.1.7) - PB Action A.1 has 7-day CT vs. 72-hr CT for TSTF Action A.1. Administrative variation (Section 2.4.1.8) - TSTF Action A.1 does not specify a second CT.</p> |

Cross-Reference of TSTF-505, Revision 2, and Point Beach Proposed Changes

| TSTF Section 3.4 - 3.9 Systems | TSTF Applicable Condition | TSTF Allow RICT? | PB Section 3.4 - 3.9 Systems | PB Applicable Condition | PB Request RICT? | Comments |
|--------------------------------|---------------------------|------------------|------------------------------|---|------------------|---|
| --- | --- | --- | Same as above | Condition B Two or three SW pumps inoperable | No | NA |
| --- | --- | --- | Same as above | Condition C SW ring header continuous flowpath interrupted | Yes | Plant-specific variation (Section 2.4.2) - TSTF Condition A applies to SW train vs. PB Condition C. Administrative variation (Section 2.4.1.7) - PB Action C.2 has 7-day CT vs. 72-hr CT for TSTF Action A.1. Administrative variation (Section 2.4.1.8) - TSTF Action A.1 does not specify a second CT. |
| --- | --- | --- | Same as above | Condition D One or more non-essential-SW-load flowpath(s) with one required automatic isolation valve inoperable AND Affected non-essential flowpath(s) not isolated | Yes | Plant-specific variation (Section 2.4.2) - TSTF Condition A applies to SW train vs. PB Condition D. Administrative variation (Section 2.4.1.8) - TSTF Action A.1 does not specify a second CT. |

Cross-Reference of TSTF-505, Revision 2, and Point Beach Proposed Changes

| TSTF Section 3.4 - 3.9 Systems | TSTF Applicable Condition | TSTF Allow RICT? | PB Section 3.4 - 3.9 Systems | PB Applicable Condition | PB Request RICT? | Comments |
|--------------------------------|---------------------------|------------------|------------------------------|--|------------------|----------|
| --- | --- | --- | Same as above | Condition E One or more non-essential-SW-load flowpath(s) with two required automatic isolation valves inoperable AND Affected non-essential flowpath(s) not isolated | No | NA |
| --- | --- | --- | Same as above | Condition F One or more opposite unit containment accident fan cooler unit SW outlet motor operated valves open AND Opposite unit containment accident fan cooler unit SW flowpath not isolated | No | NA |

Cross-Reference of TSTF-505, Revision 2, and Point Beach Proposed Changes

| TSTF Section 3.4 - 3.9 Systems | TSTF Applicable Condition | TSTF Allow RICT? | PB Section 3.4 - 3.9 Systems | PB Applicable Condition | PB Request RICT? | Comments |
|---|---|------------------|--|--|------------------|---|
| --- | --- | --- | Same as above | Condition G Four or more SW pumps inoperable | No | NA |
| STS 3.7.9 The UHS shall be OPERABLE. | Condition A One or more cooling towers with one cooling tower fan inoperable | Yes | --- | --- | --- | NA |
| TS 3.8, Electrical Power Systems | | | | | | |
| <p>STS 3.8.1 The following AC electrical sources shall be OPERABLE:</p> <p>a. Two qualified circuits between the offsite transmission network and the onsite Class 1E AC Electrical Power Distribution System,</p> <p>b. Two diesel generators (DGs) capable of supplying the onsite Class 1E power distribution subsystem(s), and</p> <p>[c. Automatic load sequencers for Train A and Train B]</p> | Condition A One [required] offsite circuit inoperable. | Yes | <p>TS 3.8.1 The following AC electrical power sources shall be OPERABLE:</p> <p>a. One circuit between the offsite transmission network and the associated unit's 4.16 kV Class 1E safeguards buses, A05 and A06, utilizing the associated unit's 345/13.8 kV (X03) transformer or the opposite unit's 345/13.8 kV (X03) transformer with the gas turbine in operation, and the associated unit's 13.8/4.16 kV (X04) transformer;</p> <p>b. One circuit between the offsite transmission network and the opposite unit's 4.16 kV Class 1E safeguards buses, A05 and A06; and</p> <p>c. One standby emergency power source capable of supplying each 4.16 kV/480 V Class 1E safeguards bus</p> | Condition A Associated unit 345/13.8 kV (X03) transformer inoperable OR Gas turbine not in operation when utilizing opposite unit's 345/13.8 kV (X03) transformer | Yes | <p>Plant-specific variation (Section 2.4.2)</p> <ul style="list-style-type: none"> - Loss of X03 vs. TSTF Condition A. - TSTF Condition A does not address gas turbine (G05) <p>Administrative variation (Section 2.4.1.5)</p> <ul style="list-style-type: none"> - TSTF LCO vs. PB LCO. <p>Administrative variation (Section 2.4.1.7)</p> <ul style="list-style-type: none"> - PB Action A.1 has 24-hour CTs vs. 72-hr CT for TSTF Action A.3. |

Cross-Reference of TSTF-505, Revision 2, and Point Beach Proposed Changes

| TSTF Section 3.4 - 3.9 Systems | TSTF Applicable Condition | TSTF Allow RICT? | PB Section 3.4 - 3.9 Systems | PB Applicable Condition | PB Request RICT? | Comments |
|--------------------------------|--|------------------|------------------------------|---|------------------|---|
| Same as above | Condition B One [required] DG inoperable | Yes | Same as above | Condition B Associated unit's 13.8/4.16kV (X04) transformer inoperable | Yes | Plant-specific variation (Section 2.4.2) - Loss of X04 vs. TSTF Condition A. Administrative variation (Section 2.4.1.5) - TSTF LCO vs. PB LCO. Administrative variation (Section 2.4.1.7) - PB Action B.1 has 24-hour CT vs. 72-hr CT for TSTF Action A.3. |
| Same as above | Condition C Two [required] offsite circuits inoperable | Yes | Same as above | Condition C Associated unit's required offsite power source to buses A05 and A06 inoperable. OR Required offsite power source to buses 1A05 and 2A06 inoperable | Yes | Plant-specific variation (Section 2.4.2) - Loss of A05 and A06 vs. TSTF Condition A. Administrative variation (Section 2.4.1.5) - TSTF LCO vs. PB LCO. Administrative variation (Section 2.4.1.7) - PB Action C.1 has 24-hour CT vs. 72-hr CT for TSTF Action A.3. |

Cross-Reference of TSTF-505, Revision 2, and Point Beach Proposed Changes

| TSTF Section 3.4 - 3.9 Systems | TSTF Applicable Condition | TSTF Allow RICT? | PB Section 3.4 - 3.9 Systems | PB Applicable Condition | PB Request RICT? | Comments |
|--------------------------------|---|------------------|------------------------------|---|------------------|---|
| Same as above | Condition D One [required] offsite circuit inoperable AND One [required] DG inoperable | Yes | Same as above | Condition D One or more required offsite power source(s) to one or more required Class 1E 4.16 kV bus(es) inoperable | Yes | Plant-specific variation (Section 2.4.2) - Loss of offsite power source(s) to one or more required Class 1E 4.16 kV bus(es) vs. TSTF Condition A. - Condition D allows "one or more" offsite power sources. Add TS note limiting RICT to one offsite source, i.e. no LOF. Administrative variation (Section 2.4.1.5) - TSTF LCO vs. PB LCO. Administrative variation (Section 2.4.1.7) - PB Action D.1 has 7-day CT vs. 72-hr CT for TSTF Action A.3. |
| Same as above | Condition E Two [required] DGs inoperable | No | Same as above | Condition E One or more required standby emergency power source(s) inoperable | No | NA |
| Same as above | Condition F [One [required] [automatic load sequencer] inoperable | Yes | Same as above | Condition F One or more required offsite power source to one or more Class 1E 4.16 kV safeguards bus(es) inoperable AND | Yes | Plant-specific variations (Section 2.4.2) - Loss of one offsite power source and one DG vs. TSTF Condition D. - Condition F allows "one or more". Add TS note limiting RICT to one offsite power source and one DG, i.e. no LOF. Administrative variation (Section 2.4.1.5) - TSTF LCO vs. PB LCO. |

Cross-Reference of TSTF-505, Revision 2, and Point Beach Proposed Changes

| TSTF Section 3.4 - 3.9 Systems | TSTF Applicable Condition | TSTF Allow RICT? | PB Section 3.4 - 3.9 Systems | PB Applicable Condition | PB Request RICT? | Comments |
|--------------------------------|---|------------------|------------------------------|---|------------------|----------|
| | | | | Standby emergency power inoperable to redundant equipment | | |
| Same as above | Condition G Required Action and associated Completion Time of Condition A, B, C, D, E, or [F] not met | No | Same as above | Condition G Standby emergency power to buses 1A05/1B03 and 1A06/1B04 inoperable. OR Standby emergency power to buses 2A05/2B03 and 2A06/2B04 inoperable. OR Standby emergency power to buses 1A05/1B03 and 2A06/2B04 inoperable | No | NA |

Cross-Reference of TSTF-505, Revision 2, and Point Beach Proposed Changes

| TSTF Section 3.4 - 3.9 Systems | TSTF Applicable Condition | TSTF Allow RICT? | PB Section 3.4 - 3.9 Systems | PB Applicable Condition | PB Request RICT? | Comments |
|---|---|------------------|---|---|------------------|---|
| Same as above | Condition H Three or more [required] AC sources inoperable | No | --- | --- | --- | NA |
| STS 3.8.4 The Train A and Train B electrical power subsystems shall be OPERABLE. | Condition A One [or two] battery charger[s] on one train] inoperable | Yes | TS 3.8.4 The D-01, D-02, D-03, and D-04 DC electrical power subsystems shall be OPERABLE | Condition A One DC electrical power subsystem inoperable | Yes | Plant-specific variation (Section 2.4.2) - Loss of one DC power subsystem vs. TSTF Condition A. Administrative variation (Section 2.4.1.5) - TSTF LCO vs. PB LCO. Administrative variation (Section 2.4.1.7) - PB Action A.1 has 2-hour CT vs. 2-hour CT for battery charge and 7-day CT for battery chargers for TSTF Action A.3. |
| Same as above | Condition B One [or two] batter[y][ies] on one train] inoperable. | Yes | --- | --- | --- | |
| Same as above | Condition C One DC electrical power subsystem inoperable for reasons other than Condition A [or B] | Yes | --- | --- | --- | |
| STS 3.8.7 The required Train A and Train B inverters shall be OPERABLE. | Condition A One [required] inverter inoperable | Yes | TS 3.8.7 Four inverters shall be OPERABLE | Condition A One required inverter inoperable | Yes | Administrative variation (Section 2.4.1.5) - TSTF LCO vs. PB LCO. Administrative variation (Section 2.4.1.7) |

Cross-Reference of TSTF-505, Revision 2, and Point Beach Proposed Changes

| TSTF Section 3.4 - 3.9 Systems | TSTF Applicable Condition | TSTF Allow RICT? | PB Section 3.4 - 3.9 Systems | PB Applicable Condition | PB Request RICT? | Comments |
|--|---|------------------|--|--|------------------|---|
| | | | | | | - PB Action A.1 has 8-hour CT vs. 24-hr CT for TSTF Action A.1. |
| <p>STS 3.8.9 Train A and Train B AC, DC, and AC vital bus electrical power distribution subsystems shall be OPERABLE.</p> | <p>Condition A One or more AC electrical power distribution systems inoperable</p> | <p>Yes</p> | <p>TS 3.8.9 The following electrical distribution buses shall be OPERABLE: a. The 4.16 kV Class 1E safeguards buses 1A05, 1A06, 2A05, and 2A06; b. The 480V Class 1E safeguards buses 1B03, 1B04, 2B03, and 2B04; c. The associated unit's 120 VAC Vital Instrument Buses Y01, Y02, Y03, Y04, Y101, Y102, Y103, and Y104; d. DC distribution buses D01, D02, D03 and D04; e. Motor Control Centers 1B30/2B30, 1B32/2B32, 1B40/2B40 and 1B42/2B42</p> | <p>Condition A One or more electrical power distribution subsystem inoperable</p> | <p>No</p> | |
| <p>Same as above</p> | <p>Condition B One or more AC vital buses inoperable</p> | <p>Yes</p> | <p>Same as above</p> | <p>Condition B Required Action and associated Completion Time not met</p> | <p>NA</p> | <p>NA</p> |
| <p>Same as above</p> | <p>Condition C One or more DC electrical power distribution subsystems</p> | <p>Yes</p> | <p>---</p> | <p>---</p> | <p>---</p> | <p>NA</p> |

Cross-Reference of TSTF-505, Revision 2, and Point Beach Proposed Changes

| TSTF Section 3.4 - 3.9 Systems | TSTF Applicable Condition | TSTF Allow RICT? | PB Section 3.4 - 3.9 Systems | PB Applicable Condition | PB Request RICT? | Comments |
|--------------------------------|--|------------------|------------------------------|-------------------------|------------------|----------|
| Same as above | Required Action and associated Completion Time not met | No | --- | --- | --- | NA |
| Same as above | Two or more electrical power distribution subsystems inoperable that result in a loss of safety function | No | --- | --- | --- | NA |

| TSTF Section 1.0 | TSTF Applicable Condition | TSTF Allow RICT? | PB Section 1.0 | PB Applicable Condition | PB Request RICT? | Comments |
|----------------------------|---------------------------|------------------|-----------------|-------------------------|------------------|--|
| TS 1.0, Definitions | | | | | | |
| Completion Time | 1.3 | --- | Completion Time | 1.3 | --- | Incorporates TSTF example of RICT into PB TS Definitions. No variations. |

| TSTF Section 5.0 | TSTF Applicable Condition | TSTF Allow RICT? | PB Section 5.0 | PB Applicable Condition | PB Request RICT? | Comments |
|---|---------------------------|------------------|--|-------------------------|------------------|---|
| TS 5.5 Programs and Manuals | | | | | | |
| TS 5.5.18 Risk Informed Completion Time Program | NA | NA | TS 5.5.7 Risk Informed Completion Time Program | NA | NA | Adds RICT Program to currently vacant TS 5.5.7. |