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

September 27, 2023

Mr. Bob Coffey
Executive Vice President, Nuclear
and Chief Nuclear Officer
Florida Power & Light Company
Mail Stop: EX/JB
700 Universe Blvd.
Juno Beach, FL 33408

SUBJECT: TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4 – ISSUANCE OF AMENDMENT NOS. 297 AND 290 REGARDING CONVERSION TO IMPROVED STANDARD TECHNICAL SPECIFICATIONS (EPID L-2021-LLI-0002)

Dear Mr. Coffey:

The U.S. Nuclear Regulatory Commission (Commission) has issued the enclosed Amendment No. 297 to Subsequent Renewed Facility Operating License No. DPR-31 and Amendment No. 290 to Subsequent Renewed Facility Operating License No. DPR-41 for the Turkey Point Nuclear Generating Unit Nos. 3 and 4, respectively (Turkey Point). These amendments revise the Technical Specifications (TS) in response to your application dated September 22, 2021, supplemented by letters dated January 19, March 30, and December 2, 2022, and April 4 and May 24, 2023.

These amendments convert the current TS (CTS) to the improved TS (ITS) and relocates certain requirements to other licensee-controlled documents. The ITS are based on:

- NUREG-1431, “Standard Technical Specifications - Westinghouse Plants,” Revision 5.0;
- “Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors,” dated July 22, 1993 (58 FR 39132); and
- Title 10, *Code of Federal Regulations*, Part 50, Section 36, “Technical specifications.”

The purpose of the conversion is to provide clearer and more readily understandable requirements in the TS for Turkey Point to ensure safe operation.

Included in the amendments are the following two conditions for the Turkey Point renewed operating license:

- the requirement to relocate certain CTS requirements into licensee-controlled documents during the implementation of the ITS; and
- the schedule for the first performance of new and revised surveillance requirements for the ITS.

The ITS will become the governing TS for Turkey Point upon the date of implementation. This means that until the implementation of the ITS is complete, the CTS shall remain in effect. Upon complete implementation of the ITS, please submit a letter stating as such within 14 days of the date of completion.

A copy of our related safety evaluation is also enclosed. Notice of issuance will be included in the Commission's monthly *Federal Register* notice.

Sincerely,

/RA/

Michael Mahoney, Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-250 and 50-251

Enclosures:
1. Amendment No. 297 to DPR-31
2. Amendment No. 290 to DPR-41
3. Safety Evaluation
4. Tables of Technical Specification Changes:
   (1) Table A - Administrative Changes
   (2) Table L - Less Restrictive Changes
   (3) Table M - More Restrictive Changes
   (4) Table R - Relocated Specifications and Removed Detail Changes

cc: Listserv

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

FLORIDA POWER & LIGHT COMPANY

DOCKET NO. 50-250

TURKEY POINT NUCLEAR GENERATING UNIT NO. 3

AMENDMENT TO SUBSEQUENT RENEWED FACILITY OPERATING LICENSE

Amendment No. 297
Subsequent Renewed License No. DPR-31

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Florida Power & Light Company (the licensee) dated September 22, 2021, as supplemented by letters dated January 19, March 30 and December 2, 2022, and April 4 and May 24, 2023, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Subsequent Renewed Facility Operating License No. DPR-31 is hereby amended to read as follows:

   B. Technical Specifications

   The Technical Specifications contained in Appendix A, as revised through Amendment No. 297, are hereby incorporated into this subsequent renewed license. The Environmental Protection Plan contained in Appendix B is hereby incorporated into this subsequent renewed operating license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance and shall be implemented by no later than 180 days after issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

David J. Wrona

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Date: 2023.09.27 10:54:44 -04'00'

David J. Wrona, Chief
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Subsequent Renewed Facility Operating License and Technical Specifications

Date of Issuance: September 27, 2023

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

FLORIDA POWER & LIGHT COMPANY

DOCKET NO. 50-251

TURKEY POINT NUCLEAR GENERATING UNIT NO. 4

AMENDMENT TO SUBSEQUENT RENEWED FACILITY OPERATING LICENSE

Amendment No. 290
Subsequent Renewed License No. DPR-41

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Florida Power & Light Company (the licensee) dated September 22, 2021, as supplemented by letters dated January 19, March 30 and December 2, 2022, and April 4 and May 24, 2023, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Subsequent Renewed Facility Operating License No. DPR-41 is hereby amended to read as follows:

    B. Technical Specifications

    The Technical Specifications contained in Appendix A, as revised through Amendment No. 290, are hereby incorporated into this subsequent renewed license. The Environmental Protection Plan contained in Appendix B is hereby incorporated into this subsequent renewed operating license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance and shall be implemented by no later than 180 days after issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

David J. Wrona

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Date: 2023.09.27 10:55:08 -04'00'

David J. Wrona, Chief
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Subsequent Renewed Facility Operating License and Technical Specifications

Date of Issuance: September 27, 2023

ATTACHMENT TO LICENSE AMENDMENT NOS. 297 AND 290

TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4

SUBSEQUENT RENEWED FACILITY OPERATING LICENSE NOS. DPR-31 AND DPR-41

DOCKET NOS. 50-250 AND 50-251

Replace the following pages of the Subsequent Renewed Facility Operating Licenses with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove	Insert
DPR-31, page 3	DPR-31, page 3
DPR-31, page 5	DPR-31, page 5
DPR-31, page 6	DPR-31, page 6
DPR-31, page 7	DPR-31, page 7
DPR-31, page 8	DPR-31, page 8
--	DPR-31, page 9
DPR-41, page 3	DPR-41, page 3
DPR-41, page 5	DPR-41, page 5
DPR-41, page 6	DPR-41, page 6
DPR-41, page 8	DPR-41, page 8
--	DPR-41, page 9

Replace the following pages of the Appendix A, Technical Specifications, with the attached pages.

Remove	Insert
All Pages	All Pages

applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect, and is subject to the additional conditions specified below:

A. Maximum Power Level

The applicant is authorized to operate the facility at reactor core power levels not in excess of 2644 megawatts (thermal).

B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 297, are hereby incorporated into this subsequent renewed license. The Environmental Protection Plan contained in Appendix B is hereby incorporated into this subsequent renewed operating license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

C. Deleted.

D. Fire Protection

FPL shall implement and maintain in effect all provisions of the approved fire protection program that comply with 10 CFR 50.48(a) and 10 CFR 50.48(c), as specified in the licensee amendment requests dated June 28, 2012 and October 17, 2018 (and supplements dated September 19, 2012; March 18, April 16, and May 15, 2013; January 7, April 4, June 6, July 18, September 12, November 5, and December 2, 2014; and February 18, 2015; October 24, and December 3, 2018; and January 31, 2019), and as approved in the safety evaluations dated May 28, 2015 and March 27, 2019. Except where NRC approval for changes or deviations is required by 10 CFR 50.48(c), and provided no other regulation, technical specification, license condition or requirement would require prior NRC approval, the licensee may make changes to the fire protection program without prior approval of the Commission if those changes satisfy the provisions set forth in 10 CFR 50.48(a) and 10 CFR 50.48(c), the change does not require a change to a technical specification or a license condition, and the criteria listed below are satisfied.

Risk-Informed Changes that May Be Made Without Prior NRC Approval

A risk assessment of the change must demonstrate that the acceptance criteria below are met. The risk assessment approach, methods, and data shall be acceptable to the NRC and shall be appropriate for the nature and scope of the

This License Condition does not apply to any demonstration of equivalency under Section 1.7 of NFPA 805.

2. Fire Protection Program Changes that Have No More than Minimal Risk Impact

Prior NRC review and approval are not required for changes to the licensee's fire protection program that have been demonstrated to have no more than a minimal risk impact. The licensee may use its screening process as approved in the NRC safety evaluation dated May 28, 2015, to determine that certain fire protection program changes meet the minimal criterion. The licensee shall ensure that fire protection defense-in-depth and safety margins are maintained when changes are made to the fire protection program.

E. The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provision of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Florida Power and Light Turkey Point Nuclear Plant Physical Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation Security Program - Revision 15" submitted by letter dated August 3, 2012.

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The Turkey Point Nuclear Generating Station CSP was approved by License Amendment No. 245 as supplemented by a change approved by Amendment Nos. 256 and 266.

F. 1. The licensee shall restrict the combined number of fuel assemblies loaded in the existing spent fuel pool storage racks and cask pit rack to no more than the capacity of the spent fuel pool storage racks. This condition applies at all times, except during activities associated with a reactor core offload/reload refueling condition. This restriction will ensure the capability to unload and remove the cask pit rack when cask loading operations are necessary.

2. The licensee shall establish two hold points within the rack installation procedure to ensure proper orientation of the cask rack in each unit's spent fuel pool. Verification of proper cask pit rack orientation will be implemented by an authorized Quality Control inspector during installation of the racks to ensure consistency with associated spent fuel pool criticality analysis assumptions.

G. Mitigation Strategy License Condition

Develop and maintain strategies for addressing large fires and explosions and that include the following key areas:

(a) Fire fighting response strategy with the following elements:

1. Pre-defined coordinated fire response strategy and guidance
2. Assessment of mutual aid fire fighting assets
3. Designated staging areas for equipment and materials
4. Command and control
5. Training of response personnel

(b) Operations to mitigate fuel damage considering the following

1. Protection and use of personnel assets
2. Communications
3. Minimizing fire spread
4. Procedures for implementing integrated fire response strategy
5. Identification of readily-available pre-staged equipment
6. Training on integrated fire response strategy
7. Spent fuel pool mitigation measures

(c) Actions to minimize release to include consideration of:

1. Water spray scrubbing
2. Dose to onsite responders

H. Deleted

I. FPL is authorized to implement the Risk Informed Completion Time Program as approved in License Amendment No. 284 subject to the following conditions:

1. Deleted.

2. The risk assessment approach and methods, shall be acceptable to the NRC, be based on the as-built, as-operated, and maintained plant, and reflect the operating experience of the plant as specified in RG 1.200. Methods to assess the risk from extending the completion times must be PRA methods accepted as part of this license amendment, or other methods approved by the NRC for generic use. If the licensee wishes to change its methods, and the change is outside the bounds of this license condition, the licensee will seek prior NRC approval via a license amendment.

J. Subsequent License Renewal License Conditions

1. The information in the Final Safety Analysis Report (FSAR) supplement submitted pursuant to 10 CFR 54.21(d), as revised during the subsequent license renewal application review process, and FPL commitments as listed in Appendix A of the “Safety Evaluation Report Related to the Subsequent License Renewal of Turkey Point Generating Units 3 and 4,” dated July 22, 2019, are collectively the “Subsequent License Renewal FSAR Supplement.” This Supplement is henceforth part of the FSAR, which will be updated in accordance with 10 CFR 50.71(e). As such, FPL may make changes to the programs, activities, and commitments described in the Subsequent License Renewal FSAR Supplement, provided FPL evaluates such changes pursuant to the criteria set forth in 10 CFR 50.59, “Changes, Tests, and Experiments,” and otherwise complies with the requirements in that section.

2. The Subsequent License Renewal FSAR Supplement, as defined in renewed license condition (J)(1) above, describes programs to be implemented and activities to be completed prior to the subsequent period of extended operation, which is the period following the July 19, 2032, expiration of the initial renewed license.

   a. FPL shall implement those new programs and enhancements to existing programs no later than 6 months before the subsequent period of extended operation.

   b. FPL shall complete those activities by the 6-month date prior to the subsequent period of extended operation or by the end of the last refueling outage before the subsequent period of extended operation, whichever occurs later.

   c. FPL shall notify the NRC in writing within 30 days after having accomplished item (2)(a) above and include the status of those activities that have been or remain to be completed in item (2)(b) above.

3. FPL shall complete the replacement of a portion of the existing containment spray system carbon steel piping with stainless steel piping by December 1, 2024, so that any remaining carbon steel piping will not normally be internally exposed to borated water during the subsequent period of extended operation. The scope of replacement is the carbon steel piping from the stainless steel to the carbon steel dissimilar metal weld for the two containment

spray piping headers (3A and 3B) at penetrations P-19A and P-19B to a minimum plant elevation of 65 feet inside containment. FPL shall notify the NRC in writing within 60 days following completion of the refueling outage during which the piping replacement is completed. The notification will confirm the elevation of the air-to-borated-water interface inside the piping and confirm that the installation of the stainless steel piping exceeds this elevation.

4. This subsequent renewed license is effective as of the date of issuance, and shall expire at midnight July 19, 2032.

K. Improved Technical Specifications Implementation License Conditions

1. Relocation of Certain Technical Specification Requirements

License Amendment 297 authorizes the relocation of certain Technical Specifications previously included in Appendix A to other licensee-controlled documents. Implementation of this amendment shall include relocation of the requirements to the specified documents, as described in Table R, Relocated Specifications and Removed Detail Changes, attached to the NRC staff's Safety Evaluation, which is enclosed in this amendment.

2. Schedule for New and Revised Surveillance Requirements (SRs)

The schedule for performing SRs that are new or revised in License Amendment 297 shall be as follows:

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

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

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

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

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Ho K. Nieh, Director
Office of Nuclear Reactor Regulation

Attachments:
Appendix A - Technical Specifications for Unit 3
Appendix B - Environmental Protection Plan

Date of Issuance: December 4, 2019

A. Maximum Power Level

The applicant is authorized to operate the facility at reactor core power levels not in excess of 2644 megawatts (thermal).

B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 290 are hereby incorporated into this subsequent renewed operating license. The Environmental Protection Plan contained in Appendix B is hereby incorporated into this subsequent renewed license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

C. Deleted

D. Fire Protection

FPL shall implement and maintain in effect all provisions of the approved fire protection program that comply with 10 CFR 50.48(a) and 10 CFR 50.48(c), as specified in the licensee amendment requests dated June 28, 2012 and October 17, 2018 (and supplements dated September 19, 2012; March 18, April 16, and May 15, 2013; January 7, April 4, June 6, July 18, September 12, November 5, and December 2, 2014; and February 18, 2015; October 24, and December 3, 2018; and January 31, 2019), and as approved in the safety evaluations dated May 28, 2015 and March 27, 2019. Except where NRC approval for changes or deviations is required by 10 CFR 50.48(c), and provided no other regulation, technical specification, license condition or requirement would require prior NRC approval, the licensee may make changes to the fire protection program without prior approval of the Commission if those changes satisfy the provisions set forth in 10 CFR 50.48(a) and 10 CFR 50.48(c), the change does not require a change to a technical specification or a license condition, and the criteria listed below are satisfied.

Risk-Informed Changes that May Be Made Without Prior NRC Approval

A risk assessment of the change must demonstrate that the acceptance criteria below are met. The risk assessment approach, methods, and data shall be acceptable to the NRC and shall be appropriate for the nature and scope of the change being evaluated; be based on the as-built, as-operated, and maintained plant; and reflect the operating experience at the plant. Acceptable methods to assess the risk of the change may include methods that have been used in the

2. Fire Protection Program Changes that Have No More than Minimal Risk Impact

   Prior NRC review and approval are not required for changes to the licensee's fire protection program that have been demonstrated to have no more than a minimal risk impact. The licensee may use its screening process as approved in the NRC safety evaluation dated May 28, 2015, to determine that certain fire protection program changes meet the minimal criterion. The licensee shall ensure that fire protection defense-in-depth and safety margins are maintained when changes are made to the fire protection program.

E. The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provision of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Florida Power and Light Turkey Point Nuclear Plant Physical Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation Security Program - Revision 15" submitted by letter dated August 3, 2012.

   The licensee shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The Turkey Point Nuclear Generating Station CSP was approved by License Amendment No. 241 as supplemented by a change approved by Amendment Nos. 252 and 261.

F. 1. The licensee shall restrict the combined number of fuel assemblies loaded in the existing spent fuel pool storage racks and cask pit rack to no more than the capacity of the spent fuel pool storage racks. This condition applies at all times, except during activities associated with a reactor core offload/reload refueling condition. This restriction will ensure the capability to unload and remove the cask pit rack when cask loading operations are necessary.

2. The licensee shall establish two hold points within the rack installation procedure to ensure proper orientation of the cask rack in each unit's spent fuel pool. Verification of proper cask pit rack orientation will be implemented by an authorized Quality Control inspector during installation of the racks to ensure consistency with associated spent fuel pool criticality analysis assumptions.

G. <u>Mitigation Strategy License Condition</u>

Develop and maintain strategies for addressing large fires and explosions and that include the following key areas:

(a) Fire fighting response strategy with the following elements:

1. Pre-defined coordinated fire response strategy and guidance
2. Assessment of mutual aid fire fighting assets
3. Designated staging areas for equipment and materials
4. Command and control
5. Training of response personnel

(b) Operations to mitigate fuel damage considering the following

1. Protection and use of personnel assets
2. Communications
3. Minimizing fire spread
4. Procedures for implementing integrated fire response strategy
5. Identification of readily-available pre-staged equipment
6. Training on integrated fire response strategy
7. Spent fuel pool mitigation measures

(c) Actions to minimize release to include consideration of:

1. Water spray scrubbing
2. Dose to onsite responders

H. Deleted

I. FPL is authorized to implement the Risk Informed Completion Time Program as approved in License Amendment No. 278 subject to the following conditions:

1. Deleted

the air-to-borated water interface inside the piping, and confirm that the installation of the stainless steel piping exceeds this elevation.

4. This subsequent renewed license is effective as of the date of issuance, and shall expire at midnight April 10, 2033.

K. Improved Technical Specifications Implementation License Conditions

1. Relocation of Certain Technical Specification Requirements

License Amendment 290 authorizes the relocation of certain Technical Specifications previously included in Appendix A to other licensee-controlled documents. Implementation of this amendment shall include relocation of the requirements to the specified documents, as described in Table R, Relocated Specifications and Removed Detail Changes, attached to the NRC staff's Safety Evaluation, which is enclosed in this amendment.

2. Schedule for New and Revised Surveillance Requirements (SRs)

The schedule for performing SRs that are new or revised in License Amendment 290 shall be as follows:

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

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

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

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

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Ho K. Nieh, Director
Office of Nuclear Reactor Regulation

Attachments:
Appendix A - Technical Specifications for Unit 4
Appendix B - Environmental Protection Plan

Date of Issuance: December 4, 2019

1.0 USE AND APPLICATION

1.1 Definitions

---NOTE---
The defined terms of this section appear in capitalized type and are applicable throughout these Technical Specifications and Bases.

Term	Definition
ACTIONS	ACTIONS shall be that part of a Specification that prescribes Required Actions to be taken under designated Conditions within specified Completion Times.
ACTUATION LOGIC TEST	An ACTUATION LOGIC TEST shall be the application of various simulated or actual input combinations in conjunction with each possible interlock logic state required for OPERABILITY of a logic circuit and the verification of the required logic output. The ACTUATION LOGIC TEST, as a minimum, shall include a continuity check of output devices.
AXIAL FLUX DIFFERENCE (AFD)	AFD shall be the difference in normalized flux signals between the top and bottom halves of a two section excore neutron detector.
CHANNEL CALIBRATION	A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds within the necessary range and accuracy to known values of the parameter that the channel monitors. The CHANNEL CALIBRATION shall encompass all devices in the channel required for channel OPERABILITY. Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an inplace qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel. The CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping, or total channel steps, and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step.
CHANNEL CHECK	A CHANNEL CHECK shall be the qualitative assessment, by observation, of channel behavior during operation. This determination shall include, where possible, comparison of the channel indication and status to other indications or status derived from independent instrument channels measuring the same parameter.

1.1 Definitions

CHANNEL OPERATIONAL TEST (COT)	A COT shall be the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify OPERABILITY of all devices in the channel required for channel OPERABILITY. The COT shall include adjustments, as necessary, of the required alarm, interlock, and trip setpoints required for channel OPERABILITY such that the setpoints are within the necessary range and accuracy. The COT may be performed by means of any series of sequential, overlapping, or total channel steps, and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step.
CORE OPERATING LIMITS REPORT (COLR)	The COLR is the unit specific document that provides cycle specific parameter limits for the current reload cycle. These cycle specific parameter limits shall be determined for each reload cycle in accordance with Specification 5.6.3. Plant operation within these limits is addressed in individual Specifications.
DOSE EQUIVALENT I-131	DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microcuries per gram) that alone would produce the same dose when inhaled as the combined activities of iodine isotopes I-131, I-132, I-133, I-134, and I-135 actually present. The determination of DOSE EQUIVALENT I-131 shall be performed using thyroid dose conversion factors from Table 2.1 of EPA Federal Guidance Report No. 11, 1988, "Limiting Values of Radionuclide Intake and Air Concentration and Dose Conversion Factors for Inhalation, Submersion, and Ingestion."
DOSE EQUIVALENT XE-133	DOSE EQUIVALENT XE-133 shall be that concentration of Xe-133 (microcuries per gram) that alone would produce the same acute dose to the whole body as the combined activities of noble gas nuclides Kr-85m, Kr-85, Kr-87, Kr-88, Xe-131m, Xe-133m, Xe-133, Xe-135m, Xe-135, and Xe-138 actually present. If a specific noble gas nuclide is not detected, it should be assumed to be present at the minimum detectable activity. The determination of DOSE EQUIVALENT XE-133 shall be performed using effective dose conversion factors for air submersion listed in Table III.1 of EPA Federal Guidance Report No. 12, 1993, "External Exposure to Radionuclides in Air, Water, and Soil."

1.1 Definitions

INSERVICE TESTING PROGRAM	The INSERVICE TESTING PROGRAM is the licensee program that fulfills the requirements of 10 CFR 50.55a(f).
LEAKAGE	LEAKAGE shall be:

a. Identified LEAKAGE

1. LEAKAGE, such as that from pump seals or valve packing (except reactor coolant pump (RCP) seal water injection or leakoff), that is captured and conducted to collection systems or a sump or collecting tank;

2. LEAKAGE into the containment atmosphere from sources that are both specifically located and known to not interfere with the operation of leakage detection systems; or

3. Reactor Coolant System (RCS) LEAKAGE through a steam generator to the Secondary System (primary to secondary LEAKAGE);

b. Unidentified LEAKAGE

All LEAKAGE (except RCP seal water injection or leakoff) that is not identified LEAKAGE; and

c. Pressure Boundary LEAKAGE

LEAKAGE (except primary to secondary LEAKAGE) through a fault in an RCS component body, pipe wall, or vessel wall. LEAKAGE past seals, packing, and gaskets is not pressure boundary LEAKAGE.

MODE	A MODE shall correspond to any one inclusive combination of core reactivity condition, power level, average reactor coolant temperature, and reactor vessel head closure bolt tensioning specified in Table 1.1-1 with fuel in the reactor vessel.

1.1 Definitions

OPERABLE – OPERABILITY	A system, subsystem, train, component, or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified safety function(s) and when all necessary attendant instrumentation, controls, normal or emergency electrical power, cooling and seal water, lubrication, and other auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its specified safety function(s) are also capable of performing their related support function(s).
PHYSICS TESTS	PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the reactor core and related instrumentation. These tests are: a. Described in Section 13.5, Reload Physics Testing of the UFSAR; b. Authorized under the provisions of 10 CFR 50.59; or c. Otherwise approved by the Nuclear Regulatory Commission.
QUADRANT POWER TILT RATIO (QPTR)	QPTR shall be the ratio of the maximum upper excore detector calibrated output to the average of the upper excore detector calibrated outputs, or the ratio of the maximum lower excore detector calibrated output to the average of the lower excore detector calibrated outputs, whichever is greater.
RATED THERMAL POWER (RTP)	RTP shall be a total reactor core heat transfer rate to the reactor coolant of 2644 MWt.
SHUTDOWN MARGIN (SDM)	SDM shall be the instantaneous amount of reactivity by which the reactor is subcritical or would be subcritical from its present condition assuming: a. All rod cluster control assemblies (RCCAs) are fully inserted except for the single RCCA of highest reactivity worth, which is assumed to be fully withdrawn. With any RCCA not capable of being fully inserted, the reactivity worth of the RCCA must be accounted for in the determination of SDM; and b. In MODES 1 and 2, the fuel and moderator temperatures are changed to the nominal zero power design limit.

1.1 Definitions

THERMAL POWER	THERMAL POWER shall be the total reactor core heat transfer rate to the reactor coolant.
TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT)	A TADOT shall consist of operating the trip actuating device and verifying the OPERABILITY of all devices in the channel required for trip actuating device OPERABILITY. The TADOT shall include adjustment, as necessary, of the trip actuating device so that it actuates at the required setpoint within the necessary accuracy. The TADOT may be performed by means of any series of sequential, overlapping, or total channel steps, and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step.

Table 1.1-1 (page 1 of 1)
MODES

MODE	TITLE	REACTIVITY CONDITION (k_{eff})	% RATED THERMAL POWER[a]	AVERAGE REACTOR COOLANT TEMPERATURE (°F)
1	Power Operation	≥ 0.99	> 5	NA
2	Startup	≥ 0.99	≤ 5	NA
3	Hot Standby	< 0.99	NA	≥ 350
4	Hot Shutdown[b]	< 0.99	NA	$350 > T_{avg} > 200$
5	Cold Shutdown[b]	< 0.99	NA	≤ 200
6	Refueling[c]	NA	NA	NA

(a) Excluding decay heat.

(b) All reactor vessel head closure bolts fully tensioned.

(c) One or more reactor vessel head closure bolts less than fully tensioned.

1.0 USE AND APPLICATION

1.2 Logical Connectors

PURPOSE

The purpose of this section is to explain the meaning of logical connectors.

Logical connectors are used in Technical Specifications (TS) to discriminate between, and yet connect, discrete Conditions, Required Actions, Completion Times, Surveillances, and Frequencies. The only logical connectors that appear in TS are AND and OR. The physical arrangement of these connectors constitutes logical conventions with specific meanings.

BACKGROUND

Several levels of logic may be used to state Required Actions. These levels are identified by the placement (or nesting) of the logical connectors and by the number assigned to each Required Action. The first level of logic is identified by the first digit of the number assigned to a Required Action and the placement of the logical connector in the first level of nesting (i.e., left justified with the number of the Required Action). The successive levels of logic are identified by additional digits of the Required Action number and by successive indentations of the logical connectors.

When logical connectors are used to state a Condition, Completion Time, Surveillance, or Frequency, only the first level of logic is used, and the logical connector is left justified with the statement of the Condition, Completion Time, Surveillance, or Frequency.

EXAMPLES

The following examples illustrate the use of logical connectors.

EXAMPLE 1.2-1

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. LCO not met.	A.1 Verify . . . AND A.2 Restore . . .	

In this example the logical connector AND is used to indicate that when in Condition A, both Required Actions A.1 and A.2 must be completed.

1.2 Logical Connectors

EXAMPLES (continued)

EXAMPLE 1.2-2

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. LCO not met.	A.1 Trip . . . OR A.2.1 Verify . . . AND A.2.2.1 Reduce . . . OR A.2.2.2 Perform . . . OR A.3 Align . . .	

This example represents a more complicated use of logical connectors. Required Actions A.1, A.2, and A.3 are alternative choices, only one of which must be performed as indicated by the use of the logical connector OR and the left justified placement. Any one of these three Actions may be chosen. If A.2 is chosen, then both A.2.1 and A.2.2 must be performed as indicated by the logical connector AND. Required Action A.2.2 is met by performing A.2.2.1 or A.2.2.2. The indented position of the logical connector OR indicates that A.2.2.1 and A.2.2.2 are alternative choices, only one of which must be performed.

1.0 USE AND APPLICATION

1.3 Completion Times

PURPOSE	The purpose of this section is to establish the Completion Time convention and to provide guidance for its use.
BACKGROUND	Limiting Conditions for Operation (LCOs) specify minimum requirements for ensuring safe operation of the unit. The ACTIONS associated with an LCO state Conditions that typically describe the ways in which the requirements of the LCO can fail to be met. Specified with each stated Condition are Required Action(s) and Completion Time(s).

DESCRIPTION

The Completion Time is the amount of time allowed for completing a Required Action. It is referenced to the discovery of a situation (e.g., inoperable equipment or variable not within limits) that requires entering an ACTIONS Condition unless otherwise specified, providing the unit is in a MODE or specified condition stated in the Applicability of the LCO.

Unless otherwise specified, the Completion Time begins when a senior licensed operator on the operating shift crew with responsibility for plant operations makes the determination that an LCO is not met and an ACTIONS Condition is entered. The "otherwise specified" exceptions are varied, such as a Required Action Note or Surveillance Requirement Note that provides an alternative time to perform specific tasks, such as testing, without starting the Completion Time. While utilizing the Note, should a Condition be applicable for any reason not addressed by the Note, the Completion Time begins. Should the time allowance in the Note be exceeded, the Completion Time begins at that point. The exceptions may also be incorporated into the Completion Time. For example, LCO 3.8.1, "AC Sources - Operating," Required Action C.2, requires declaring required feature(s) supported by an inoperable emergency diesel generator, inoperable when the redundant required feature(s) are inoperable. The Completion Time states, "4 hours from discovery of Condition C concurrent with inoperability of redundant required feature(s)." In this case the Completion Time does not begin until the conditions in the Completion Time are satisfied.

Required Actions must be completed prior to the expiration of the specified Completion Time. An ACTIONS Condition remains in effect and the Required Actions apply until the Condition no longer exists or the unit is not within the LCO Applicability.

If situations are discovered that require entry into more than one Condition at a time within a single LCO (multiple Conditions), the Required Actions for each Condition must be performed within the associated Completion Time. When in multiple Conditions, separate

1.3 Completion Times

DESCRIPTION (continued)

Completion Times are tracked for each Condition starting from the discovery of the situation that required entry into the Condition, unless otherwise specified.

Once a Condition has been entered, subsequent trains, subsystems, components, or variables expressed in the Condition, discovered to be inoperable or not within limits, will not result in separate entry into the Condition, unless specifically stated. The Required Actions of the Condition continue to apply to each additional failure, with Completion Times based on initial entry into the Condition, unless otherwise specified.

However, when a subsequent train, subsystem, component, or variable expressed in the Condition is discovered to be inoperable or not within limits, the Completion Time(s) may be extended. To apply this Completion Time extension, two criteria must first be met. The subsequent inoperability:

a. Must exist concurrent with the first inoperability and

b. Must remain inoperable or not within limits after the first inoperability is resolved.

The total Completion Time allowed for completing a Required Action to address the subsequent inoperability shall be limited to the more restrictive of either:

a. The stated Completion Time, as measured from the initial entry into the Condition, plus an additional 24 hours or

b. The stated Completion Time as measured from discovery of the subsequent inoperability.

The above Completion Time extensions do not apply to those Specifications that have exceptions that allow completely separate re-entry into the Condition (for each train, subsystem, component, or variable expressed in the Condition) and separate tracking of Completion Times based on this re-entry. These exceptions are stated in individual Specifications.

1.3 Completion Times

DESCRIPTION (continued)

The above Completion Time extension does not apply to a Completion Time with a modified "time zero." This modified "time zero" may be expressed as a repetitive time (i.e., "once per 8 hours," where the Completion Time is referenced from a previous completion of the Required Action versus the time of Condition entry) or as a time modified by the phrase "from discovery . . ."

EXAMPLES

The following examples illustrate the use of Completion Times with different types of Conditions and changing Conditions.

EXAMPLE 1.3-1

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. AND B.2 Be in MODE 5.	6 hours 36 hours

Condition B has two Required Actions. Each Required Action has its own separate Completion Time. Each Completion Time is referenced to the time that Condition B is entered.

The Required Actions of Condition B are to be in MODE 3 within 6 hours AND in MODE 5 within 36 hours. A total of 6 hours is allowed for reaching MODE 3 and a total of 36 hours (not 42 hours) is allowed for reaching MODE 5 from the time that Condition B was entered. If MODE 3 is reached within 3 hours, the time allowed for reaching MODE 5 is the next 33 hours because the total time allowed for reaching MODE 5 is 36 hours.

If Condition B is entered while in MODE 3, the time allowed for reaching MODE 5 is the next 36 hours.

1.3 Completion Times

EXAMPLES (continued)

EXAMPLE 1.3-2

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One pump inoperable.	A.1 Restore pump to OPERABLE status.	7 days
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. AND B.2 Be in MODE 5.	6 hours 36 hours

When a pump is declared inoperable, Condition A is entered. If the pump is not restored to OPERABLE status within 7 days, Condition B is also entered and the Completion Time clocks for Required Actions B.1 and B.2 start. If the inoperable pump is restored to OPERABLE status after Condition B is entered, Conditions A and B are exited, and therefore, the Required Actions of Condition B may be terminated.

When a second pump is declared inoperable while the first pump is still inoperable, Condition A is not re-entered for the second pump. LCO 3.0.3 is entered, since the ACTIONS do not include a Condition for more than one inoperable pump. The Completion Time clock for Condition A does not stop after LCO 3.0.3 is entered, but continues to be tracked from the time Condition A was initially entered.

While in LCO 3.0.3, if one of the inoperable pumps is restored to OPERABLE status and the Completion Time for Condition A has not expired, LCO 3.0.3 may be exited and operation continued in accordance with Condition A.

While in LCO 3.0.3, if one of the inoperable pumps is restored to OPERABLE status and the Completion Time for Condition A has expired, LCO 3.0.3 may be exited and operation continued in accordance with Condition B. The Completion Time for Condition B is tracked from the time the Condition A Completion Time expired.

1.3 Completion Times

EXAMPLES (continued)

On restoring one of the pumps to OPERABLE status, the Condition A Completion Time is not reset, but continues from the time the first pump was declared inoperable. This Completion Time may be extended if the pump restored to OPERABLE status was the first inoperable pump. A 24 hour extension to the stated 7 days is allowed, provided this does not result in the second pump being inoperable for > 7 days.

EXAMPLE 1.3-3

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One Function X train inoperable.	A.1 Restore Function X train to OPERABLE status.	7 days
B. One Function Y train inoperable.	B.1 Restore Function Y train to OPERABLE status.	72 hours
C. One Function X train inoperable. AND One Function Y train inoperable.	C.1 Restore Function X train to OPERABLE status. OR C.2 Restore Function Y train to OPERABLE status.	72 hours 72 hours

When one Function X train and one Function Y train are inoperable, Condition A and Condition B are concurrently applicable. The Completion Times for Condition A and Condition B are tracked separately for each

1.3 Completion Times

EXAMPLES (continued)

train starting from the time each train was declared inoperable and the Condition was entered. A separate Completion Time is established for Condition C and tracked from the time the second train was declared inoperable (i.e., the time the situation described in Condition C was discovered).

If Required Action C.2 is completed within the specified Completion Time, Conditions B and C are exited. If the Completion Time for Required Action A.1 has not expired, operation may continue in accordance with Condition A. The remaining Completion Time in Condition A is measured from the time the affected train was declared inoperable (i.e., initial entry into Condition A).

It is possible to alternate between Conditions A, B, and C in such a manner that operation could continue indefinitely without ever restoring systems to meet the LCO. However, doing so would be inconsistent with the basis of the Completion Times. Therefore, there shall be administrative controls to limit the maximum time allowed for any combination of Conditions that result in a single contiguous occurrence of failing to meet the LCO. These administrative controls shall ensure that the Completion Times for those Conditions are not inappropriately extended.

<u>EXAMPLE 1.3-4</u>

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more valves inoperable.	A.1 Restore valve(s) to OPERABLE status.	4 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. <u>AND</u> B.2 Be in MODE 4.	6 hours 12 hours

1.3 Completion Times

EXAMPLES (continued)

A single Completion Time is used for any number of valves inoperable at the same time. The Completion Time associated with Condition A is based on the initial entry into Condition A and is not tracked on a per valve basis. Declaring subsequent valves inoperable, while Condition A is still in effect, does not trigger the tracking of separate Completion Times.

Once one of the valves has been restored to OPERABLE status, the Condition A Completion Time is not reset, but continues from the time the first valve was declared inoperable. The Completion Time may be extended if the valve restored to OPERABLE status was the first inoperable valve. The Condition A Completion Time may be extended for up to 4 hours provided this does not result in any subsequent valve being inoperable for > 4 hours.

If the Completion Time of 4 hours (including the extension) expires while one or more valves are still inoperable, Condition B is entered.

<u>EXAMPLE 1.3-5</u>

ACTIONS

--- NOTE ---
Separate Condition entry is allowed for each inoperable valve.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more valves inoperable.	A.1 Restore valve(s) to OPERABLE status.	4 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. <u>AND</u> B.2 Be in MODE 4.	6 hours 12 hours

The Note above the ACTIONS Table is a method of modifying how the Completion Time is tracked. If this method of modifying how the Completion Time is tracked was applicable only to a specific Condition,

1.3 Completion Times

EXAMPLES (continued)

the Note would appear in that Condition rather than at the top of the ACTIONS Table.

The Note allows Condition A to be entered separately for each inoperable valve, and Completion Times tracked on a per valve basis. When a valve is declared inoperable, Condition A is entered and its Completion Time starts. If subsequent valves are declared inoperable, Condition A is entered for each valve and separate Completion Times start and are tracked for each valve.

If the Completion Time associated with a valve in Condition A expires, Condition B is entered for that valve. If the Completion Times associated with subsequent valves in Condition A expire, Condition B is entered separately for each valve and separate Completion Times start and are tracked for each valve. If a valve that caused entry into Condition B is restored to OPERABLE status, Condition B is exited for that valve.

Since the Note in this example allows multiple Condition entry and tracking of separate Completion Times, Completion Time extensions do not apply.

EXAMPLE 1.3-6

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One channel inoperable.	A.1 Perform SR 3.x.x.x.	Once per 8 hours
	OR	
	A.2 Reduce THERMAL POWER to ≤ 50% RTP.	8 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours

1.3 Completion Times

EXAMPLES (continued)

Entry into Condition A offers a choice between Required Action A.1 or A.2. Required Action A.1 has a "once per" Completion Time, which qualifies for the 25% extension, per SR 3.0.2, to each performance after the initial performance. The initial 8 hour interval of Required Action A.1 begins when Condition A is entered and the initial performance of Required Action A.1 must be complete within the first 8 hour interval. If Required Action A.1 is followed, and the Required Action is not met within the Completion Time (plus the extension allowed by SR 3.0.2), Condition B is entered. If Required Action A.2 is followed and the Completion Time of 8 hours is not met, Condition B is entered.

If after entry into Condition B, Required Action A.1 or A.2 is met, Condition B is exited and operation may then continue in Condition A.

<u>EXAMPLE 1.3-7</u>

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One subsystem inoperable.	A.1 Verify affected subsystem isolated. <u>AND</u> A.2 Restore subsystem to OPERABLE status.	1 hour <u>AND</u> Once per 8 hours thereafter 72 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. <u>AND</u> B.2 Be in MODE 5.	6 hours 36 hours

1.3 Completion Times

EXAMPLES (continued)

Required Action A.1 has two Completion Times. The 1 hour Completion Time begins at the time the Condition is entered and each "Once per 8 hours thereafter" interval begins upon performance of Required Action A.1.

If after Condition A is entered, Required Action A.1 is not met within either the initial 1 hour or any subsequent 8 hour interval from the previous performance (plus the extension allowed by SR 3.0.2), Condition B is entered. The Completion Time clock for Condition A does not stop after Condition B is entered, but continues from the time Condition A was initially entered. If Required Action A.1 is met after Condition B is entered, Condition B is exited and operation may continue in accordance with Condition A, provided the Completion Time for Required Action A.2 has not expired.

EXAMPLE 1.3-8

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One subsystem inoperable.	A.1 Restore subsystem to OPERABLE status.	7 days OR In accordance with the Risk Informed Completion Time Program
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. AND B.2 Be in MODE 5.	6 hours 36 hours

1.3 Completion Times

EXAMPLES (continued)

When a subsystem is declared inoperable, Condition A is entered. The 7 day Completion Time may be applied as discussed in Example 1.3-2. However, the licensee may elect to apply the Risk Informed Completion Time Program which permits calculation of a Risk Informed Completion Time (RICT) that may be used to complete the Required Action beyond the 7 day Completion Time. The RICT cannot exceed 30 days. After the 7 day Completion Time has expired, the subsystem must be restored to OPERABLE status within the RICT or Condition B must also be entered.

The Risk Informed Completion Time Program requires recalculation of the RICT to reflect changing plant conditions. For planned changes, the revised RICT must be determined prior to implementation of the change in configuration. For emergent conditions, the revised RICT must be determined within the time limits of the Required Action Completion Time (i.e., not the RICT) or 12 hours after the plant configuration change, whichever is less.

If the 7 day Completion Time clock of Condition A has expired and subsequent changes in plant condition result in exiting the applicability of the Risk Informed Completion Time Program without restoring the inoperable subsystem to OPERABLE status, Condition B is also entered and the Completion Time clocks for Required Actions B.1 and B.2 start.

If the RICT expires or is recalculated to be less than the elapsed time since the Condition was entered and the inoperable subsystem has not been restored to OPERABLE status, Condition B is also entered and the Completion Time clocks for Required Actions B.1 and B.2 start. If the inoperable subsystems are restored to OPERABLE status after Condition B is entered, Condition A is exited, and therefore, the Required Actions of Condition B may be terminated.

IMMEDIATE COMPLETION TIME

When "Immediately" is used as a Completion Time, the Required Action should be pursued without delay and in a controlled manner.

1.0 USE AND APPLICATION

1.4 Frequency

PURPOSE	The purpose of this section is to define the proper use and application of Frequency requirements.

DESCRIPTION

Each Surveillance Requirement (SR) has a specified Frequency in which the Surveillance must be met in order to meet the associated LCO. An understanding of the correct application of the specified Frequency is necessary for compliance with the SR.

The "specified Frequency" is referred to throughout this section and each of the Specifications of Section 3.0, Surveillance Requirement (SR) Applicability. The "specified Frequency" consists of the requirements of the Frequency column of each SR as well as certain Notes in the Surveillance column that modify performance requirements.

Sometimes special situations dictate when the requirements of a Surveillance are to be met. They are "otherwise stated" conditions allowed by SR 3.0.1. They may be stated as clarifying Notes in the Surveillance, as part of the Surveillance or both.

Situations where a Surveillance could be required (i.e., its Frequency could expire), but where it is not possible or not desired that it be performed until sometime after the associated LCO is within its Applicability, represent potential SR 3.0.4 conflicts. To avoid these conflicts, the SR (i.e., the Surveillance or the Frequency) is stated such that it is only "required" when it can be and should be performed. With an SR satisfied, SR 3.0.4 imposes no restriction.

The use of "met" or "performed" in these instances conveys specific meanings. A Surveillance is "met" only when the acceptance criteria are satisfied. Known failure of the requirements of a Surveillance, even without a Surveillance specifically being "performed," constitutes a Surveillance not "met." "Performance" refers only to the requirement to specifically determine the ability to meet the acceptance criteria.

Some Surveillances contain notes that modify the Frequency of performance or the conditions during which the acceptance criteria must be satisfied. For these Surveillances, the MODE-entry restrictions of SR 3.0.4 may not apply. Such a Surveillance is not required to be performed prior to entering a MODE or other specified condition in the Applicability of the associated LCO if any of the following three conditions are satisfied:

1.4 Frequency

DESCRIPTION (continued)

a. The Surveillance is not required to be met in the MODE or other specified condition to be entered, or

b. The Surveillance is required to be met in the MODE or other specified condition to be entered, but has been performed within the specified Frequency (i.e., it is current) and is known not to be failed, or

c. The Surveillance is required to be met, but not performed, in the MODE or other specified condition to be entered, and is known not to be failed.

Examples 1.4-3, 1.4-4, 1.4-5, and 1.4-6 discuss these special situations.

EXAMPLES

The following examples illustrate the various ways that Frequencies are specified. In these examples, the Applicability of the LCO (LCO not shown) is MODES 1, 2, and 3.

1.4 Frequency

EXAMPLES (continued)

EXAMPLE 1.4-1

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
Perform CHANNEL CHECK.	12 hours

Example 1.4-1 contains the type of SR most often encountered in the Technical Specifications (TS). The Frequency specifies an interval (12 hours) during which the associated Surveillance must be performed at least one time. Performance of the Surveillance initiates the subsequent interval. Although the Frequency is stated as 12 hours, an extension of the time interval to 1.25 times the stated Frequency is allowed by SR 3.0.2 for operational flexibility. The measurement of this interval continues at all times, even when the SR is not required to be met per SR 3.0.1 (such as when the equipment is inoperable, a variable is outside specified limits, or the unit is outside the Applicability of the LCO). If the interval specified by SR 3.0.2 is exceeded while the unit is in a MODE or other specified condition in the Applicability of the LCO, and the performance of the Surveillance is not otherwise modified (refer to Example 1.4-3), then SR 3.0.3 becomes applicable.

If the interval as specified by SR 3.0.2 is exceeded while the unit is not in a MODE or other specified condition in the Applicability of the LCO for which performance of the SR is required, then SR 3.0.4 becomes applicable. The Surveillance must be performed within the Frequency requirements of SR 3.0.2, as modified by SR 3.0.3, prior to entry into the MODE or other specified condition or the LCO is considered not met (in accordance with SR 3.0.1) and LCO 3.0.4 becomes applicable.

1.4 Frequency

EXAMPLES (continued)

EXAMPLE 1.4-2

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
Verify flow is within limits.	Once within 12 hours after ≥ 25% RTP AND 24 hours thereafter

Example 1.4-2 has two Frequencies. The first is a one time performance Frequency, and the second is of the type shown in Example 1.4-1. The logical connector "AND" indicates that both Frequency requirements must be met. Each time reactor power is increased from a power level < 25% RTP to ≥ 25% RTP, the Surveillance must be performed within 12 hours.

The use of "once" indicates a single performance will satisfy the specified Frequency (assuming no other Frequencies are connected by "AND"). This type of Frequency does not qualify for the 25% extension allowed by SR 3.0.2. "Thereafter" indicates future performances must be established per SR 3.0.2, but only after a specified condition is first met (i.e., the "once" performance in this example). If reactor power decreases to < 25% RTP, the measurement of both intervals stops. New intervals start upon reactor power reaching 25% RTP.

1.4 Frequency

EXAMPLES (continued)

EXAMPLE 1.4-3

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
------------------------------NOTE--------------------------- Not required to be performed until 12 hours after ≥ 25% RTP. --- Perform channel adjustment.	7 days

The interval continues, whether or not the unit operation is < 25% RTP between performances.

As the Note modifies the required performance of the Surveillance, it is construed to be part of the "specified Frequency." Should the 7 day interval be exceeded while operation is < 25% RTP, this Note allows 12 hours after power reaches ≥ 25% RTP to perform the Surveillance. The Surveillance is still considered to be performed within the "specified Frequency." Therefore, if the Surveillance were not performed within the 7 day (plus the extension allowed by SR 3.0.2) interval, but operation was < 25% RTP, it would not constitute a failure of the SR or failure to meet the LCO. Also, no violation of SR 3.0.4 occurs when changing MODES, even with the 7 day Frequency not met, provided operation does not exceed 12 hours (plus the extension allowed by SR 3.0.2) with power ≥ 25% RTP.

Once the unit reaches 25% RTP, 12 hours would be allowed for completing the Surveillance. If the Surveillance were not performed within this 12 hour interval (plus the extension allowed by SR 3.0.2), there would then be a failure to perform a Surveillance within the specified Frequency, and the provisions of SR 3.0.3 would apply.

1.4 Frequency

EXAMPLES (continued)

EXAMPLE 1.4-4

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
----------------------------NOTE--------------------------- Only required to be met in MODE 1. --	
Verify leakage rates are within limits.	24 hours

Example 1.4-4 specifies that the requirements of this Surveillance do not have to be met until the unit is in MODE 1. The interval measurement for the Frequency of this Surveillance continues at all times, as described in Example 1.4-1. However, the Note constitutes an "otherwise stated" exception to the Applicability of this Surveillance. Therefore, if the Surveillance were not performed within the 24 hour interval (plus the extension allowed by SR 3.0.2), but the unit was not in MODE 1, there would be no failure of the SR nor failure to meet the LCO. Therefore, no violation of SR 3.0.4 occurs when changing MODES, even with the 24 hour Frequency exceeded, provided the MODE change was not made into MODE 1. Prior to entering MODE 1 (assuming again that the 24 hour Frequency were not met), SR 3.0.4 would require satisfying the SR.

1.4 Frequency

EXAMPLES (continued)

EXAMPLE 1.4-5

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
-----------------------------NOTE--------------------------- Only required to be performed in MODE 1. --- Perform complete cycle of the valve.	7 days

The interval continues, whether or not the unit operation is in MODE 1, 2, or 3 (the assumed Applicability of the associated LCO) between performances.

As the Note modifies the required performance of the Surveillance, the Note is construed to be part of the "specified Frequency." Should the 7 day interval be exceeded while operation is not in MODE 1, this Note allows entry into and operation in MODES 2 and 3 to perform the Surveillance. The Surveillance is still considered to be performed within the "specified Frequency" if completed prior to entering MODE 1. Therefore, if the Surveillance were not performed within the 7 day (plus the extension allowed by SR 3.0.2) interval, but operation was not in MODE 1, it would not constitute a failure of the SR or failure to meet the LCO. Also, no violation of SR 3.0.4 occurs when changing MODES, even with the 7 day Frequency not met, provided operation does not result in entry into MODE 1.

Once the unit reaches MODE 1, the requirement for the Surveillance to be performed within its specified Frequency applies and would require that the Surveillance had been performed. If the Surveillance were not performed prior to entering MODE 1, there would then be a failure to perform a Surveillance within the specified Frequency, and the provisions of SR 3.0.3 would apply.

1.4 Frequency

EXAMPLES (continued)

EXAMPLE 1.4-6

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
------------------------------NOTE--------------------------- Not required to be met in MODE 3. ---	
Verify parameter is within limits.	24 hours

Example 1.4-6 specifies that the requirements of this Surveillance do not have to be met while the unit is in MODE 3 (the assumed Applicability of the associated LCO is MODES 1, 2, and 3). The interval measurement for the Frequency of this Surveillance continues at all times, as described in Example 1.4-1. However, the Note constitutes an "otherwise stated" exception to the Applicability of this Surveillance. Therefore, if the Surveillance were not performed within the 24 hour interval (plus the extension allowed by SR 3.0.2), and the unit was in MODE 3, there would be no failure of the SR nor failure to meet the LCO. Therefore, no violation of SR 3.0.4 occurs when changing MODES to enter MODE 3, even with the 24 hour Frequency exceeded, provided the MODE change does not result in entry into MODE 2. Prior to entering MODE 2 (assuming again that the 24 hour Frequency was not met), SR 3.0.4 would require satisfying the SR.

2.0 SAFETY LIMITS (SLs)

2.1 SLs

2.1.1 Reactor Core SLs

In MODES 1 and 2, the combination of THERMAL POWER, Reactor Coolant System (RCS) highest loop average temperature, and pressurizer pressure shall not exceed the limits specified in the COLR; and the following SLs shall not be exceeded:

2.1.1.1 The departure from nucleate boiling ratio (DNBR) shall be maintained ≥ 1.17 for the WRB-1 DNB correlation.

2.1.1.2 The peak fuel centerline temperature shall be maintained < 5080°F, decreasing by 9°F per 10,000 MWD/MTU of burnup.

2.1.2 Reactor Coolant System Pressure SL

In MODES 1, 2, 3, 4, and 5, the RCS pressure shall be maintained ≤ 2735 psig.

2.2 SAFETY LIMIT VIOLATIONS

2.2.1 If SL 2.1.1 is violated, restore compliance and be in MODE 3 within 1 hour.

2.2.2 If SL 2.1.2 is violated:

2.2.2.1 In MODE 1 or 2, restore compliance and be in MODE 3 within 1 hour.

2.2.2.2 In MODE 3, 4, or 5, restore compliance within 5 minutes.

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.1

LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2, LCO 3.0.7, LCO 3.0.8, and LCO 3.0.9.

LCO 3.0.2

Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated.

LCO 3.0.3

When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

a. MODE 3 within 7 hours,

b. MODE 4 within 13 hours, and

c. MODE 5 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4.

LCO 3.0.4

When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:

a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time;

b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate (exceptions to this Specification are stated in the individual Specifications); or

3.0 LCO Applicability

LCO 3.0.4 (continued)

c. When an allowance is stated in the individual value, parameter, or other Specification.

This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

LCO 3.0.5

Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

LCO 3.0.6

When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Specification 5.5.12, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

LCO 3.0.7

Test Exception LCO 3.1.8 allows specified Technical Specification (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Test Exception LCOs is optional. When a Test Exception LCO is desired to be met but is not met, the ACTIONS of the Test Exception LCO shall be met. When a Test Exception LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications.

3.0 LCO Applicability

LCO 3.0.8

When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:

a. the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or

b. the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.

At the end of the specified period the required snubbers must be able to perform their associated support function(s), or the affected supported system LCO(s) shall be declared not met.

LCO 3.0.9

When one or more required barriers are unable to perform their related support function(s), any supported system LCO(s) are not required to be declared not met solely for this reason for up to 30 days provided that at least one train or subsystem of the supported system is OPERABLE and supported by barriers capable of providing their related support function(s), and risk is assessed and managed. This specification may be concurrently applied to more than one train or subsystem of a multiple train or subsystem supported system provided at least one train or subsystem of the supported system is OPERABLE and the barriers supporting each of these trains or subsystems provide their related support function(s) for different categories of initiating events.

If the required OPERABLE train or subsystem becomes inoperable while this specification is in use, it must be restored to OPERABLE status within 24 hours or the provisions of this specification cannot be applied to the trains or subsystems supported by the barriers that cannot perform their related support function(s).

At the end of the specified period, the required barriers must be able to perform their related support function(s) or the supported system LCO(s) shall be declared not met.

3.0 LCO Applicability

LCO 3.0.10 LCO Conditions and the associated Required Actions shall apply to each unit individually unless otherwise indicated as follows:

a. Whenever the LCO refers to systems or components which are shared by both units, the Conditions and Required Actions will apply to both units simultaneously;

b. Whenever the LCO applies to only one unit, this will be identified in the Applicability section of the Specification; and

c. Whenever certain portions of a Specification contain operating parameters, setpoints, etc., which are different for each unit, this will be identified in parentheses, Notes, or body of the requirement.

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

SR 3.0.1	SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.
SR 3.0.2	The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met. For Frequencies specified as "once," the above interval extension does not apply. If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance. Exceptions to this Specification are stated in the individual Specifications.
SR 3.0.3	If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. The delay period is only applicable when there is a reasonable expectation the Surveillance will be met when performed. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed. If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered. When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.
SR 3.0.4	Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4.

3.0 SR Applicability

SR 3.0.4 (continued)

This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

SR 3.0.5 Surveillance Requirements shall apply to each unit individually unless otherwise indicated as stated in LCO 3.0.10 for individual Specifications or whenever certain portions of a Specification contain Surveillance parameters different for each unit, which will be identified in parentheses, notes, or body of the requirement.

3.1 REACTIVITY CONTROL SYSTEMS

3.1.1 SHUTDOWN MARGIN (SDM)

LCO 3.1.1 SDM shall be within the limits specified in the COLR.

APPLICABILITY: MODE 2 with k_{eff} < 1.0,
MODES 3, 4, and 5.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. SDM not within limits.	A.1 Initiate boration to restore SDM to within limits.	15 minutes

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.1.1.1	Verify SDM to be within the limits specified in the COLR.	In accordance with the Surveillance Frequency Control Program

3.1 REACTIVITY CONTROL SYSTEMS

3.1.2 Core Reactivity

LCO 3.1.2 The measured core reactivity shall be within ± 1% $\Delta k/k$ of predicted values.

APPLICABILITY: MODES 1 and 2.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. Measured core reactivity not within limit.	A.1	Re-evaluate core design and safety analysis, and determine that the reactor core is acceptable for continued operation.	7 days
	<u>AND</u>		
	A.2	Establish appropriate operating restrictions and SRs.	7 days
B. Required Action and associated Completion Time not met.	B.1	Be in MODE 3.	6 hours

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.1.2.1	--------------------------NOTE-------------------------------- The predicted reactivity values may be adjusted (normalized) to correspond to the measured core reactivity prior to exceeding a fuel burnup of 60 effective full power days (EFPD) after each fuel loading. -- Verify measured core reactivity is within ± 1% $\Delta k/k$ of predicted values.	Once prior to entering MODE 1 after each refueling <u>AND</u> --------NOTE-------- Only required after 60 EFPD ---------------------- In accordance with the Surveillance Frequency Control Program

3.1 REACTIVITY CONTROL SYSTEMS

3.1.3 Moderator Temperature Coefficient (MTC)

LCO 3.1.3 The MTC shall be maintained within the limits specified in the COLR. The maximum upper limit shall be + 5.0 X 10^{-5} $\Delta k/k°F$.

APPLICABILITY: MODE 1 and MODE 2 with keff ≥ 1.0 for the beginning of life (BOL) MTC limit,
MODES 1, 2, and 3 for the end of life (EOL) MTC limit.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. MTC not within BOL limit.	A.1	Establish administrative withdrawal limits for control banks to maintain MTC within limit.	24 hours
B. Required Action and associated Completion Time of Condition A not met.	B.1	Be in MODE 2 with k_{eff} < 1.0.	6 hours
C. MTC not within EOL limit.	C.1	Be in MODE 4.	12 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.1.3.1	Verify MTC is within BOL limit.	Prior to entering MODE 1 after each refueling

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.1.3.2	---------------------------NOTES--------------------------- 1. Not required to be performed until 7 effective full power days (EFPD) after reaching the equivalent of an equilibrium RTP all rods out (ARO) boron concentration of 300 ppm. 2. If the MTC is more negative than the 300 ppm Surveillance limit (not LCO limit) specified in the COLR, SR 3.1.3.2 shall be repeated once per 14 EFPD during the remainder of the fuel cycle. 3. SR 3.1.3.2 need not be repeated if the MTC measured at the equivalent of equilibrium RTP-ARO boron concentration of ≤ 60 ppm is less negative than the 60 ppm Surveillance limit specified in the COLR. 4. Measurement of MTC may be suspended provided the benchmark criteria and the revised prediction specified in the COLR are satisfied. -- Verify MTC is within EOL limit.	Once each cycle

3.1 REACTIVITY CONTROL SYSTEMS

3.1.4 Rod Group Alignment Limits

LCO 3.1.4 All shutdown and control rods shall be OPERABLE.

AND

Rod misalignment between analog rod position indication and group step counter demand position shall be:

a. $\pm$ 18 steps with THERMAL POWER $\leq$ 90% RTP, and

b. $\pm$ 12 steps with THERMAL POWER > 90% RTP.

APPLICABILITY: MODES 1 and 2.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more rod(s) inoperable.	A.1.1 Verify SDM to be within the limits specified in the COLR.	1 hour
	OR	
	A.1.2 Initiate boration to restore SDM to within limit.	1 hour
	AND	
	A.2 Be in MODE 3.	6 hours
B. One rod not within alignment limits.	B.1.1 Verify SDM to be within the limits specified in the COLR.	1 hour
	OR	

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.1.2 Initiate boration to restore SDM to within limit.	1 hour
	AND	
	B.2 Reduce THERMAL POWER to ≤ 75% RTP.	2 hours
	AND	
	B.3 Verify SDM is within the limits specified in the COLR.	Once per 12 hours
	AND	
	B.4.1 -------------NOTE------------- Not required to be performed when F_Q^P exceeds F_Q^L and THERMAL POWER is $> P_T$. -----------------------------------	
	Perform SR 3.2.1.1.	72 hours
	OR	
	B.4.2 -------------NOTE------------- Only required to be performed when F_Q^P exceeds F_Q^L and THERMAL POWER is $> P_T$. -----------------------------------	
	Perform SR 3.2.1.2.	72 hours
	AND	

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
B. (continued)	B.5	Perform SR 3.2.2.1.	72 hours
	AND		
	B.6	Re-evaluate safety analyses and confirm results remain valid for duration of operation under these conditions.	5 days
C. Required Action and associated Completion Time of Condition B not met.	C.1	Be in MODE 3.	6 hours
D. More than one rod not within alignment limit.	D.1.1	Verify SDM is within the limits specified in the COLR.	1 hour
	OR		
	D.1.2	Initiate boration to restore required SDM to within limit.	1 hour
	AND		
	D.2	Be in MODE 3.	6 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.1.4.1	---------------------------- NOTES ---------------------------- 1. Not required to be performed for rods associated with inoperable rod position indicator or demand position indicator. 2. Not required to be performed until 1 hour after associated rod motion. --- Verify position of individual rods within alignment limit.	In accordance with the Surveillance Frequency Control Program
SR 3.1.4.2	Verify rod freedom of movement (trippability) by moving each rod not fully inserted in the core ≥ 10 steps in either direction.	In accordance with the Surveillance Frequency Control Program
SR 3.1.4.3	Verify rod drop time of each rod, from the fully withdrawn position, is ≤ 2.4 seconds from the beginning of decay of stationary gripper coil voltage to dashpot entry, with: a. T_{avg} ≥ 500°F and b. All reactor coolant pumps operating.	Prior to criticality after each removal of the reactor head

3.1 REACTIVITY CONTROL SYSTEMS

3.1.5 Shutdown Bank Insertion Limits

LCO 3.1.5 Each shutdown bank shall be within insertion limits specified in the COLR.

---NOTE---
Not applicable to shutdown banks inserted while performing SR 3.1.4.2.

APPLICABILITY: MODES 1 and 2.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One shutdown bank inserted ≤ 20 steps beyond the insertion limits specified in the COLR.	A.1 Verify all control banks are within the insertion limits specified in the COLR.	1 hour
	AND	
	A.2.1 Verify SDM is within the limits specified in the COLR.	1 hour
	OR	
	A.2.2 Initiate boration to restore SDM to within limit.	1 hour
	AND	
	A.3 Restore the shutdown bank to within the insertion limits specified in the COLR.	24 hours
B. One or more shutdown banks not within limits for reasons other than Condition A.	B.1.1 Verify SDM is within the limits specified in the COLR.	1 hour
	OR	

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.1.2 Initiate boration to restore SDM to within limit.	1 hour
	AND	
	B.2 Restore shutdown banks to within limits.	2 hours
C. Required Action and associated Completion Time not met.	C.1 Be in MODE 3.	6 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.1.5.1	---------------------------- NOTE ------------------------------ Not required to be performed until 1 hour after associated rod motion. --	
	Verify each shutdown bank is within the insertion limits specified in the COLR.	In accordance with the Surveillance Frequency Control Program

3.1 REACTIVITY CONTROL SYSTEMS

3.1.6 Control Bank Insertion Limits

LCO 3.1.6 Control banks shall be within the insertion, sequence, and overlap limits specified in the COLR.

---NOTE---
Not applicable to control banks inserted while performing SR 3.1.4.2.

APPLICABILITY: MODE 1,
MODE 2 with k_{eff} ≥1.0.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Control bank A, B, or C inserted ≤ 20 steps beyond the insertion, sequence, or overlap limits specified in the COLR.	A.1 Verify all shutdown banks are within the insertion limits specified in the COLR.	1 hour
	AND	
	A.2.1 Verify SDM is within the limits specified in the COLR.	1 hour
	OR	
	A.2.2 Initiate boration to restore SDM to within limit.	1 hour
	AND	
	A.3 Restore the control bank to within the insertion, sequence, and overlap limits specified in the COLR.	24 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Control bank insertion limits not met for reasons other than Condition A.	B.1.1 Verify SDM is within the limits specified in the COLR.	1 hour
	OR	
	B.1.2 Initiate boration to restore SDM to within limit.	1 hour
	AND	
	B.2 Restore control bank(s) to within limits.	2 hours
C. Control bank sequence or overlap limits not met for reasons other than Condition A.	C.1.1 Verify SDM is within the limits specified in the COLR.	1 hour
	OR	
	C.1.2 Initiate boration to restore SDM to within limit.	1 hour
	AND	
	C.2 Restore control bank sequence and overlap to within limits.	2 hours
D. Required Action and associated Completion Time not met.	D.1 Be in MODE 2 with k_{eff} < 1.0.	6 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.1.6.1	Verify estimated critical control bank position is within the limits specified in the COLR.	Within 4 hours prior to achieving criticality
SR 3.1.6.2	---------------------------- NOTE ------------------------------ Not required to be performed until 1 hour after associated rod motion. --- Verify each control bank insertion is within the insertion limits specified in the COLR.	In accordance with the Surveillance Frequency Control Program
SR 3.1.6.3	---------------------------- NOTE ------------------------------ Not required to be performed until 1 hour after associated rod motion. --- Verify sequence and overlap limits specified in the COLR are met for control banks not fully withdrawn from the core.	In accordance with the Surveillance Frequency Control Program

3.1 REACTIVITY CONTROL SYSTEMS

3.1.7 Rod Position Indication

LCO 3.1.7 The Rod Position Indication (RPI) System and the Demand Position Indication System shall be OPERABLE.

------------------------------------ NOTE ------------------------------------
Individual RPIs are not required to be OPERABLE for 1 hour following movement of the associated rods.

APPLICABILITY: MODES 1 and 2.

ACTIONS

------------------------------------NOTE------------------------------------
Separate Condition entry is allowed for each inoperable RPI and each demand position indicator.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One RPI per group inoperable in one or more groups.	A.1 Verify the position of the rods with inoperable RPI indirectly by using movable incore detectors. <u>OR</u> A.2 Verify the position of the rods with inoperable RPI indirectly by using the moveable incore detectors.	Once per 8 hours 8 hours <u>AND</u> Once per 31 EFPD thereafter <u>AND</u>

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. (continued)			8 hours after discovery of each unintended rod movement <u>AND</u> 8 hours after each movement of rod with inoperable RPI > 12 steps <u>AND</u> Prior to THERMAL POWER exceeding 50% RTP <u>AND</u> 8 hours after reaching RTP
	<u>OR</u>		
	A.3	Reduce THERMAL POWER to < 75% RTP.	8 hours
B. More than one RPI per group inoperable in one or more groups.	B.1	Place the control rods under manual control.	Immediately
	<u>AND</u>		
	B.2	Restore inoperable RPIs to OPERABLE status such that a maximum of one RPI per group is inoperable.	24 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
C. One or more RPI inoperable in one or more groups and associated rod has been moved > 24 steps in one direction since the last determination of the rod's position.	C.1	Verify the position of the rods with inoperable RPIs indirectly by using movable incore detectors.	8 hours
	<u>OR</u>		
	C.2	Reduce THERMAL POWER to < 75% RTP.	8 hours
D. One or more demand position indicators per bank inoperable in one or more banks.	D.1.1	Verify by administrative means all RPIs for the affected banks are OPERABLE.	Once per 8 hours
	<u>AND</u>		
	D.1.2	Verify the most withdrawn rod and the least withdrawn rod of the affected banks are within required rod misalignment limits.	Once per 8 hours
	<u>OR</u>		
	D.2	Reduce THERMAL POWER to < 75% RTP.	8 hours
E. Required Action and associated Completion Time not met.	E.1	Be in MODE 3.	6 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.1.7.1	----------------------------- NOTE ------------------------------ RPI detectors are excluded from CHANNEL CALIBRATION. --- Perform CHANNEL CALIBRATION of each RPI.	Once prior to criticality after each removal of the reactor head

3.1 REACTIVITY CONTROL SYSTEMS

3.1.8 PHYSICS TESTS Exceptions – MODE 2

LCO 3.1.8 During the performance of PHYSICS TESTS, the requirements of:

LCO 3.1.3, "Moderator Temperature Coefficient;"
LCO 3.1.4, "Rod Group Alignment Limits;"
LCO 3.1.5, "Shutdown Bank Insertion Limits;"
LCO 3.1.6, "Control Bank Insertion Limits;" and
LCO 3.4.2, "RCS Minimum Temperature for Criticality"

may be suspended and the number of required channels for LCO 3.3.1, "RTS Instrumentation," Functions 2 and 17.d, may be reduced to 3 required channels, provided:

a. RCS lowest loop average temperature is ≥ 531°F,

b. SDM is within the limits specified in the COLR, and

c. THERMAL POWER is ≤ 5% RTP.

APPLICABILITY: During PHYSICS TESTS initiated in MODE 2.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. SDM not within limit.	A.1 Initiate boration to restore SDM to within limit. AND A.2 Suspend PHYSICS TESTS exceptions.	15 minutes 1 hour
B. THERMAL POWER not within limit.	B.1 Open reactor trip breakers.	Immediately
C. RCS lowest loop average temperature not within limit.	C.1 Restore RCS lowest loop average temperature to within limit.	15 minutes

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition C not met.	D.1 Be in MODE 3.	15 minutes

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.1.8.1	Perform a CHANNEL OPERATIONAL TEST on power range and intermediate range channels per SR 3.3.1.7, SR 3.3.1.8, and Table 3.3.1-1.	Prior to initiation of PHYSICS TESTS
SR 3.1.8.2	Verify the RCS lowest loop average temperature is ≥ 531°F.	In accordance with the Surveillance Frequency Control Program
SR 3.1.8.3	Verify THERMAL POWER is ≤ 5% RTP.	In accordance with the Surveillance Frequency Control Program
SR 3.1.8.4	Verify SDM is within the limits specified in the COLR.	In accordance with the Surveillance Frequency Control Program

3.2 POWER DISTRIBUTION LIMITS

3.2.1 Heat Flux Hot Channel Factor ($F_Q(Z)$)

LCO 3.2.1 $F_Q(Z)$, shall be within the limits specified in the COLR.

AND

With predicted F_Q (F_Q^P) > F_Q limit (F_Q^L) and THERMAL POWER > predicted threshold power (P_T) calculated as specified in the COLR, THERMAL POWER shall be less than the following limit calculated as specified in the COLR:

a. Base load power limit (P_{BL}) during base load operation, and

b. Radial burndown power limit (P_{RB}) during radial burndown conditions.

APPLICABILITY: MODE 1.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. ------------NOTE------------ Required Action A.4 shall be completed whenever this Condition is entered. ---------------------------------	A.1 Reduce THERMAL POWER ≥ 1% RTP for each 1% $F_Q(Z)$ exceeds limit.	15 minutes after each $F_Q(Z)$ determination
	AND	
$F_Q(Z)$ not within limit when determined by SR 3.2.1.1.	A.2 Reduce Power Range Neutron Flux - High trip setpoints ≥ 1% for each 1% $F_Q(Z)$ exceeds limit.	72 hours after each $F_Q(Z)$ determination
	AND	
	A.3 Reduce Overpower ΔT trip setpoints ≥ 1% for each 1% $F_Q(Z)$ exceeds limit.	72 hours after each $F_Q(Z)$ determination
	AND	

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. (continued)	A.4	Perform SR 3.2.1.1.	Prior to increasing THERMAL POWER above the limit of Required Action A.1
B. ------------NOTE------------ Required Action B.4 shall be completed whenever this Condition is entered. ---------------------------------	B.1	Reduce THERMAL POWER ≥ 1% RTP for each 1% $F_j(Z)$ exceeds limit.	15 minutes
	AND		
$F_Q(Z)$ not within limit when determined per SR 3.2.1.2 and $F_j(Z)$ exceeds limit by ≤ 4%.	B.2	Reduce Power Range Neutron Flux - High trip setpoints ≥ 1% RTP for each 1% $F_j(Z)$ exceeds limit.	72 hours
	AND		
	B.3	Reduce Overpower ΔT trip setpoints ≥ 1% RTP for each 1% $F_j(Z)$ exceeds limit.	72 hours
	AND		
	B.4	Perform SR 3.2.1.2.	Prior to increasing THERMAL POWER above the limit of Required Action B.1
C. $F_Q(Z)$ not within limits when determined per SR 3.2.1.2 and $F_j(Z)$ exceeds limit by > 4%.	C.1	Reduce THERMAL POWER ≤ P_T.	Immediately

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
D. $F_Q^P > F_Q^L$ and THERMAL POWER $> P_{BL}$ specified in the COLR. OR $F_Q^P > F_Q^L$ and THERMAL POWER $> P_{RB}$ specified in the COLR.	D.1	Reduce THERMAL POWER $\leq P_T$.	15 minutes
	OR		
	D.2	Initiate action to perform SR 3.2.1.2 using augmented calculation.	15 minutes
E. Required Action and associated Completion Time not met.	E.1	Be in MODE 2.	6 hours

SURVEILLANCE REQUIREMENTS

--NOTE--

During power escalation at the beginning of each cycle, THERMAL POWER may be increased until an equilibrium power level has been achieved, at which a power distribution map is obtained.

	SURVEILLANCE	FREQUENCY
SR 3.2.1.1	------------------------------NOTE------------------------------ Not required to be performed when F_Q^P exceeds F_Q^L and THERMAL POWER is > P_T. --- Verify $F_Q(Z)$ is within limit.	Once after each refueling prior to THERMAL POWER exceeding 75% RTP <u>AND</u> In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.2.1.2	------------------------------NOTE------------------------------ Only required to be performed when F_Q^P exceeds F_Q^L and THERMAL POWER is > P_T. ---	
	Verify $F_Q(Z)$ is within limit specified in the COLR using calculation for base load operation or radial burndown conditions, or augmented calculation.	Within 2, 4, and 8 hours following THERMAL POWER exceeding P_T <u>AND</u> Within 2, 4, and 8 hours following movement of Control Bank D more than accumulated total of 15 steps in any direction <u>AND</u> Once within 24 hours of entering base load operation <u>AND</u> 31 EFPDs thereafter during base load operation <u>AND</u> In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.2.1.3	------------------------------NOTE------------------------------ Only required to be performed when F_Q^P exceeds F_Q^L and THERMAL POWER is > P_T. -- Calculate P_{BL}.	Prior to entering base load operation

3.2 POWER DISTRIBUTION LIMITS

3.2.2 Nuclear Enthalpy Rise Hot Channel Factor ($F^N_{\Delta H}$)

LCO 3.2.2 $F^N_{\Delta H}$ shall be within the limits specified in the COLR.

APPLICABILITY: MODE 1.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. ------------NOTE------------ Required Actions A.2 and A.3 must be completed whenever Condition A is entered. --------------------------------- $F^N_{\Delta H}$ not within limit.	A.1.1 Restore $F^N_{\Delta H}$ to within limit.	4 hours
	<u>OR</u>	
	A.1.2.1 Reduce THERMAL POWER to < 50% RTP.	4 hours
	<u>AND</u>	
	A.1.2.2 Reduce Power Range Neutron Flux - High trip setpoints to ≤ 55% RTP.	72 hours
	<u>AND</u>	
	A.2 Perform SR 3.2.2.1.	24 hours
	<u>AND</u>	

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. (continued)	A.3	--------------NOTE-------------- THERMAL POWER does not have to be reduced to comply with this Required Action. ------------------------------------- Perform SR 3.2.2.1.	Prior to THERMAL POWER exceeding 50% RTP <u>AND</u> Prior to THERMAL POWER exceeding 75% RTP <u>AND</u> 24 hours after THERMAL POWER reaching ≥ 95% RTP
B. Required Action and associated Completion Time not met.	B.1	Be in MODE 2.	6 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.2.2.1	Verify $F^N_{\Delta H}$ is within limits specified in the COLR.	Once after each refueling prior to THERMAL POWER exceeding 75% RTP <u>AND</u> In accordance with the Surveillance Frequency Control Program

3.2 POWER DISTRIBUTION LIMITS

3.2.3 AXIAL FLUX DIFFERENCE (AFD)

LCO 3.2.3 The AFD in % flux difference units shall be maintained within the limits specified in the COLR.

--NOTE--
The AFD shall be considered outside limits when two or more OPERABLE excore channels indicate AFD to be outside limits.

APPLICABILITY: MODE 1 with THERMAL POWER ≥ 50% RTP.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. AFD not within limits during base load operation ≥ P_T.	A.1 Reduce THERMAL POWER to < P_T.	30 minutes
	<u>OR</u>	
	A.2 Discontinue base load operation.	30 minutes
B. AFD not within limits for reasons other than Condition A.	B.1 Reduce THERMAL POWER to < 50% RTP.	30 minutes

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.2.3.1	Verify AFD within limits for each OPERABLE excore channel.	In accordance with the Surveillance Frequency Control Program

3.2 POWER DISTRIBUTION LIMITS

3.2.4 QUADRANT POWER TILT RATIO (QPTR)

LCO 3.2.4 The QPTR shall be ≤ 1.02.

APPLICABILITY: MODE 1 with THERMAL POWER > 50% RTP.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. QPTR not within limit.	A.1 Reduce THERMAL POWER ≥ 3% from RTP for each 1% of QPTR > 1.00.	2 hours after each QPTR determination
	AND	
	A.2 Determine QPTR.	Once per 12 hours
	AND	
	A.3 Perform SR 3.2.1.1, or SR 3.2.1.2, as applicable, and SR 3.2.2.1.	24 hours after achieving equilibrium conditions from a THERMAL POWER reduction per Required Action A.1 AND Once per 7 days thereafter
	AND	

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. (continued)	A.4	Reevaluate safety analyses and confirm results remain valid for duration of operation under this condition.	Prior to increasing THERMAL POWER above the limit of Required Action A.1
	AND		
	A.5	-------------NOTES------------- 1. Perform Required Action A.5 only after Required Action A.4 is completed. 2. Required Action A.6 shall be completed whenever Required Action A.5 is performed. -------------------------------------	
		Normalize excore detectors to restore QPTR to within limit.	Prior to increasing THERMAL POWER above the limit of Required Action A.1
	AND		
	A.6	---------------NOTE-------------- Perform Required Action A.6 only after Required Action A.5 is completed. -------------------------------------	
		Perform SR 3.2.1.1, or SR 3.2.1.2, as applicable, and SR 3.2.2.1.	Within 24 hours after achieving equilibrium conditions at RTP not to exceed 48 hours after increasing THERMAL POWER above the limit of Required Action A.1

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
B. Required Action and associated Completion Time not met.	B.1	Reduce THERMAL POWER to ≤ 50% RTP.	4 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.2.4.1	------------------------------NOTES---------------------------- 1. With input from one Power Range Neutron Flux channel inoperable and THERMAL POWER ≤ 75% RTP, the remaining three power range channels can be used for calculating QPTR. 2. SR 3.2.4.2 may be performed in lieu of this Surveillance. --- Verify QPTR is within limit by calculation.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.2.4.2	-------------------------------NOTE------------------------------ Not required to be performed until 12 hours after input from one or more Power Range Neutron Flux channels are inoperable with THERMAL POWER > 75% RTP. --- Verify QPTR is within limit using the movable incore detectors.	In accordance with the Surveillance Frequency Control Program
SR 3.2.4.3	------------------------------NOTES----------------------------- 1. Only applicable when one Power Range Neutron Flux channel is inoperable. 2. Not required to be performed until 12 hours after input from one Power Range Neutron Flux channel is inoperable with THERMAL POWER > 75% RTP. --- Verify QPTR is within limit using incore thermocouple map.	In accordance with the Surveillance Frequency Control Program

3.3 INSTRUMENTATION

3.3.1 Reactor Trip System (RTS) Instrumentation

LCO 3.3.1 The RTS instrumentation for each Function in Table 3.3.1-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.1-1.

ACTIONS

---NOTE---

Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Functions with one or more required channels or trains inoperable.	A.1 Enter the Condition referenced in Table 3.3.1-1 for the channel(s) or train(s).	Immediately
B. One Manual Reactor Trip channel inoperable.	B.1 Restore channel to OPERABLE status.	48 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program
C. One channel or train inoperable.	C.1 Restore channel or train to OPERABLE status.	48 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. One Power Range Neutron Flux - High channel inoperable.	-------------------NOTE-------------------- The inoperable channel may be bypassed for up to 4 hours for surveillance testing and setpoint adjustment of other channels. ---	
	D.1.1 Reduce THERMAL POWER to ≤ 75% RTP.	4 hours
	AND	
	D.1.2 Place channel in trip.	6 hours
	OR	
	D.2.1 Place channel in trip.	6 hours
	AND	
	D.2.2 --------------NOTE-------------- Only required to be performed when the Power Range Neutron Flux input to QPTR is inoperable. --------------------------------------	
	Perform SR 3.2.4.2 or SR 3.2.4.3.	Once per 12 hours
E. One channel inoperable.	--------------------NOTE------------------- The inoperable channel may be bypassed for up to 4 hours for surveillance testing of other channels. ---	
	E.1 Place channel in trip.	6 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
F. One Intermediate Range Neutron Flux channel inoperable.	F.1	Reduce THERMAL POWER to < P-6.	24 hours
	OR		
	F.2	Increase THERMAL POWER to > P-10.	24 hours
G. Two Intermediate Range Neutron Flux channels inoperable.	G.1	--------------NOTE-------------- Limited plant cooldown or boron dilution is allowed provided the change is accounted for in the calculated SDM. ------------------------------------	
		Suspend operations involving positive reactivity additions.	Immediately
	AND		
	G.2	Reduce THERMAL POWER to < P-6.	2 hours
H. One Source Range Neutron Flux channel inoperable.	H.1	--------------NOTE-------------- Limited plant cooldown or boron dilution is allowed provided the change is accounted for in the calculated SDM. ------------------------------------	
		Suspend operations involving positive reactivity additions.	Immediately

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
I. Two Source Range Neutron Flux channels inoperable.	I.1	Open reactor trip breakers (RTBs).	Immediately
J. One Source Range Neutron Flux channel inoperable.	J.1	Restore channel to OPERABLE status.	48 hours
K. Required Action and associated Completion Time of Condition C or J not met.	K.1	Initiate action to fully insert all rods.	Immediately
	AND		
	K.2	Place the Rod Control System in a condition incapable of rod withdrawal.	1 hour
L. One channel inoperable.	L.1	Place channel in trip.	6 hours
M. Required Action and associated Completion Time of Condition L not met.	M.1	Reduce THERMAL POWER to < P-7.	6 hours
N. One channel inoperable.	N.1	Be in MODE 2.	6 hours
O. One train inoperable.	--------------------NOTE------------------- One train may be bypassed for up to 2 hours for surveillance testing provided the other train is OPERABLE. ---		
	O.1	Be in MODE 3.	6 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
P. One or more channels inoperable.	P.1	Verify interlock is in required state for existing unit conditions.	1 hour
Q. One or more channels inoperable.	Q.1	Verify interlock is in required state for existing unit conditions.	1 hour
R. Required Action and associated Completion Time of Condition Q not met.	R.1	Be in MODE 2.	6 hours
S. One trip mechanism inoperable for one RTB.	S.1	Restore trip mechanism to OPERABLE status.	48 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program
T. Required Action and associated Completion Time of Condition B, D, E, P, or S not met.	T.1	Be in MODE 3.	6 hours

SURVEILLANCE REQUIREMENTS

--NOTE--
Refer to Table 3.3.1-1 to determine which SRs apply for each RTS Function.

SURVEILLANCE		FREQUENCY
SR 3.3.1.1	Perform CHANNEL CHECK.	In accordance with the Surveillance Frequency Control Program
SR 3.3.1.2	----------------------------NOTE-------------------------------- Not required to be performed until 12 hours after THERMAL POWER is ≥ 15% RTP. -- Compare results of calorimetric heat balance calculation to power range channel output. Adjust power range channel output if calorimetric heat balance calculations results exceed power range channel output by more than +2% RTP.	In accordance with the Surveillance Frequency Control Program
SR 3.3.1.3	----------------------------NOTE-------------------------------- Not required to be performed until 24 hours after THERMAL POWER is ≥ 15% RTP. -- Compare results of the incore detector measurements to Nuclear Instrumentation System (NIS) AFD. Adjust NIS channel if absolute difference is ≥ 3%.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.1.4	-----------------------------NOTE------------------------------ This Surveillance must be performed on the reactor trip bypass breaker prior to placing the bypass breaker in service. --- Perform TADOT.	In accordance with the Surveillance Frequency Control Program
SR 3.3.1.5	Perform ACTUATION LOGIC TEST.	In accordance with the Surveillance Frequency Control Program
SR 3.3.1.6	----------------------------NOTE------------------------------- Not required to be performed until 24 hours after THERMAL POWER is ≥ 75% RTP. --- Calibrate excore channels to agree with incore detector measurements.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.1.7	------------------------------NOTE------------------------------ Not required to be performed for source range instrumentation prior to entering MODE 3 from MODE 2 until 4 hours after entry into MODE 3. -- Perform COT.	 In accordance with the Surveillance Frequency Control Program
SR 3.3.1.8	------------------------------NOTE------------------------------ This Surveillance shall include verification that interlocks P-6 and P-10 are in their required state for existing unit conditions. -- Perform COT.	 --------NOTE-------- Only required when not performed within the Frequency specified in the Surveillance Frequency Control Program ------------------------ Prior to reactor startup <u>AND</u> In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.1.9	------------------------------NOTE------------------------------ Neutron detectors are excluded from CHANNEL CALIBRATION. -- Perform CHANNEL CALIBRATION.	In accordance with the Surveillance Frequency Control Program
SR 3.3.1.10	Perform CHANNEL CALIBRATION.	In accordance with the Surveillance Frequency Control Program
SR 3.3.1.11	Perform COT.	In accordance with the Surveillance Frequency Control Program
SR 3.3.1.12	------------------------------NOTE------------------------------ Verification of setpoint is not required. -- Perform TADOT.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.1.13	------------------------------NOTE------------------------------ Verification of setpoint is not required. -- Perform TADOT.	Prior to exceeding the P-7 interlock whenever the unit has been in MODE 3, if not performed within the previous 31 days

Table 3.3.1-1 (page 1 of 10)
Reactor Trip System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	TRIP SETPOINT
1. Manual Reactor Trip	1,2	2	B	SR 3.3.1.12	NA	NA
	3(a),4(a),5(a)	2	C	SR 3.3.1.12	NA	NA
2. Power Range Neutron Flux						
a. High	1,2	4	D	SR 3.3.1.1 SR 3.3.1.2 SR 3.3.1.7(b)(c) SR 3.3.1.9(b)(c)	≤ 108.6% RTP	108.0% RTP
b. Low	1(d),2	4	E	SR 3.3.1.1 SR 3.3.1.8(f)(g) SR 3.3.1.9(f)(g)	≤ 28% RTP	≤ 25% RTP
3. Intermediate Range Neutron Flux	1(d),2	2	F, G	SR 3.3.1.1 SR 3.3.1.8(f)(g) SR 3.3.1.9(f)(g)	≤ 31% RTP	≤ 25% RTP
4. Source Range Neutron Flux	2(e)	2	H, I	SR 3.3.1.1 SR 3.3.1.8(f)(g) SR 3.3.1.9(f)(g)	≤ 1.4 E5 cps	≤ 1.0 E5 cps
	3(a),4(a),5(a)	2	I, J	SR 3.3.1.1 SR 3.3.1.7(f)(g) SR 3.3.1.9(f)(g)	≤ 1.4 E5 cps	≤ 1.0 E5 cps

(a) With Rod Control System capable of rod withdrawal or one or more rods not fully insert.

(b) If the as-found channel setpoint is outside its predefined as-found tolerance, then the channel shall be evaluated to verify that it is functioning as required before returning the channel to service.

(c) The instrument channel setpoint shall be reset to a value that is within the as-left tolerance around the Nominal Trip Setpoint (NTSP) at the completion of the surveillance; otherwise, the channel shall be declared inoperable. Setpoints more conservative than the NTSP are acceptable provided that the as-found and as-left tolerances apply to the actual setpoint implemented in the Surveillance procedures (field setting) to confirm channel performance. The NTSP and the methodologies used to determine the as-found and as-left tolerances are specified in UFSAR Section 7.2.

(d) Below the P-10 (Power Range Neutron Flux) interlocks.

(e) Below the P-6 (Intermediate Range Neutron Flux) interlocks.

(f) The instrument channel setpoint shall be reset to a value within the calibration tolerance of the Trip Setpoint at the completion of the surveillance; otherwise, the channel shall be declared inoperable.

(g) If the instrument channel setpoint is less conservative than the Allowable Value, the setpoint shall be reset consistent with the Trip Setpoint and within 12 hours determine the affected channel is OPERABLE; otherwise, the channel shall be declared inoperable.

Table 3.3.1-1 (page 2 of 10)
Reactor Trip System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	TRIP SETPOINT
5. Overtemperature ΔT	1,2	3	E	SR 3.3.1.1 SR 3.3.1.3 SR 3.3.1.6 SR 3.3.1.7[b][c] SR 3.3.1.10[b][c]	Refer to Note 2 (Page 3.3.1-18)	Refer to Note 1 (Page 3.3.1-17)
6. Overpower ΔT	1,2	3	E	SR 3.3.1.1 SR 3.3.1.7[b][c] SR 3.3.1.10[b][c]	Refer to Note 4 (Page 3.3.1-20)	Refer to Note 3 (Page 3.3.1-19)
7. Pressurizer Pressure - Low	1[h]	3	L	SR 3.3.1.1 SR 3.3.1.7[f][g] SR 3.3.1.10[f][g]	≥ 1817 psig	≥ 1835 psig
8. Pressurizer Pressure - High	1,2	3	L	SR 3.3.1.1 SR 3.3.1.7[f][g] SR 3.3.1.10[f][g]	≤ 2403 psig	≤ 2385 psig
9. Pressurizer Water Level - High	1[h]	3	L	SR 3.3.1.1 SR 3.3.1.7[f][g] SR 3.3.1.10[f][g]	≤ 92.2%	≤ 92.0%
10. Reactor Coolant Flow - Low						
a. Single Loop	1[i]	3 per loop	L	SR 3.3.1.1 SR 3.3.1.7[b][c] SR 3.3.1.10[b][c]	≥ 89.6%	90.0%

(b) If the as-found channel setpoint is outside its predefined as-found tolerance, then the channel shall be evaluated to verify that it is functioning as required before returning the channel to service.

(c) The instrument channel setpoint shall be reset to a value that is within the as-left tolerance around the Nominal Trip Setpoint (NTSP) at the completion of the surveillance; otherwise, the channel shall be declared inoperable. Setpoints more conservative than the NTSP are acceptable provided that the as-found and as-left tolerances apply to the actual setpoint implemented in the Surveillance procedures (field setting) to confirm channel performance. The NTSP and the methodologies used to determine the as-found and as-left tolerances are specified in UFSAR Section 7.2.

(f) The instrument channel setpoint shall be reset to a value within the calibration tolerance of the Trip Setpoint at the completion of the surveillance; otherwise, the channel shall be declared inoperable.

(g) If the instrument channel setpoint is less conservative than the Allowable Value, the setpoint shall be reset consistent with the Trip Setpoint and within 12 hours determine the affected channel is OPERABLE; otherwise, the channel shall be declared inoperable.

(h) Above the P-7 (Low Power Reactor Trips Block) interlock.

(i) Above the P-8 (Power Range Neutron Flux) interlock.

Table 3.3.1-1 (page 3 of 10)
Reactor Trip System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	TRIP SETPOINT
10. Reactor Coolant Flow – Low (continued)						
b. Two Loops	1(j)	3 per loop	L	SR 3.3.1.1 SR 3.3.1.7(b)(c) SR 3.3.1.10(b)(c)	≥ 89.6%	90.0%
11. Steam Generator (SG) Water Level – Low Low	1,2	3 per SG	L	SR 3.3.1.1 SR 3.3.1.7(b)(c) SR 3.3.1.10(b)(c)	≥ 15.5%	16.0%
12. SG Water Level – Low	1,2	2 per SG	L	SR 3.3.1.1 SR 3.3.1.7(b)(c) SR 3.3.1.10(b)(c)	≥ 15.5%	16.0%
Coincident with Steam Flow/Feedwater Flow Mismatch	1,2	2 per SG	L	SR 3.3.1.1 SR 3.3.1.7(b)(c) SR 3.3.1.10(b)(c)	≤ 20.7% below rated steam flow	20.0% below rated steam flow
13. Undervoltage – 4.16 kV Buses A and B	1(h)	2 per bus	L	SR 3.3.1.10(f)(g)	≥ 69% bus voltage	≥ 70% bus voltage
14 Underfrequency RCPs Breakers Open	1(h)	2 per bus	N	SR 3.3.1.10(f)(g)	≥ 55.9 Hz	≥ 56.1 Hz

(b) If the as-found channel setpoint is outside its predefined as-found tolerance, then the channel shall be evaluated to verify that it is functioning as required before returning the channel to service.

(c) The instrument channel setpoint shall be reset to a value that is within the as-left tolerance around the Nominal Trip Setpoint (NTSP) at the completion of the surveillance; otherwise, the channel shall be declared inoperable. Setpoints more conservative than the NTSP are acceptable provided that the as-found and as-left tolerances apply to the actual setpoint implemented in the Surveillance procedures (field setting) to confirm channel performance. The NTSP and the methodologies used to determine the as-found and as-left tolerances are specified in UFSAR Section 7.2.

(f) The instrument channel setpoint shall be reset to a value within the calibration tolerance of the Trip Setpoint at the completion of the surveillance; otherwise, the channel shall be declared inoperable.

(g) If the instrument channel setpoint is less conservative than the Allowable Value, the setpoint shall be reset consistent with the Trip Setpoint and within 12 hours determine the affected channel is OPERABLE; otherwise, the channel shall be declared inoperable.

(h) Above the P-7 (Low Power Reactor Trips Block) interlock.

(j) Above the P-7 (Low Power Reactor Trips Block) interlock and below the P-8 (Power Range neutron Flux) interlock.

Table 3.3.1-1 (page 4 of 10)
Reactor Trip System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	TRIP SETPOINT
15. Turbine Trip						
a. Emergency Trip Header Pressure	1(h)	3	L	SR 3.3.1.10(b)(c) SR 3.3.1.13	≥ 901 psig	1000 psig
b. Turbine Stop Valve Closure	1(h)	2	L	SR 3.3.1.10 SR 3.3.1.13	Fully Closed	Fully Closed
16. Safety Injection (SI) Input from Engineered Safety Feature Actuation System (ESFAS)	1,2	2 trains	O	SR 3.3.1.12	NA	NA
17. Reactor Trip System Interlocks						
a. Intermediate Range Neutron Flux, P-6	2(e)	2	P	SR 3.3.1.9(f)(g) SR 3.3.1.11(f)(g)	≥ 6E-11 amp	Nominal 1E-10 amp
b. Low Power Reactor Trips Block, P-7						
1) P10 Input	1	4	Q	SR 3.3.1.9(f)(g) SR 3.3.1.11(f)(g)	≤ 13% RTP	Nominal 10% RTP
2) Turbine Inlet Pressure.	1	2	Q	SR 3.3.1.9(f)(g) SR 3.3.1.11(f)(g)	≤ 13% turbine power	Nominal 10% turbine power

(b) If the as-found channel setpoint is outside its predefined as-found tolerance, then the channel shall be evaluated to verify that it is functioning as required before returning the channel to service.

(c) The instrument channel setpoint shall be reset to a value that is within the as-left tolerance around the Nominal Trip Setpoint (NTSP) at the completion of the surveillance; otherwise, the channel shall be declared inoperable. Setpoints more conservative than the NTSP are acceptable provided that the as-found and as-left tolerances apply to the actual setpoint implemented in the Surveillance procedures (field setting) to confirm channel performance. The NTSP and the methodologies used to determine the as-found and as-left tolerances are specified in UFSAR Section 7.2.

(e) Below the P-6 (Intermediate Range Neutron Flux) interlocks.

(f) The instrument channel setpoint shall be reset to a value within the calibration tolerance of the Trip Setpoint at the completion of the surveillance; otherwise, the channel shall be declared inoperable.

(g) If the instrument channel setpoint is less conservative than the Allowable Value, the setpoint shall be reset consistent with the Trip Setpoint and within 12 hours determine the affected channel is OPERABLE; otherwise, the channel shall be declared inoperable.

(h) Above the P-7 (Low Power Reactor Trips Block) interlock.

Table 3.3.1-1 (page 5 of 10)
Reactor Trip System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	TRIP SETPOINT
17. Reactor Trip System Interlocks (continued)						
c. Power Range Neutron Flux, P-8	1	4	Q	SR 3.3.1.9[f][g] SR 3.3.1.11[f][g]	≤ 48% RTP	Nominal 45% RTP
d. Power Range Neutron Flux, P-10	1,2	4	P	SR 3.3.1.9[f][g] SR 3.3.1.11[f][g]	≥ 7% RTP	Nominal 10% RTP
18. Reactor Coolant Pump (RCP) Breaker Position						
a. Single Loop	1[i]	1 per RCP breaker	N	SR 3.3.1.12	NA	NA
b. Two Loops	1[j]	1 per RCP breaker	N	SR 3.3.1.12	NA	NA
19. Reactor Trip Breakers (RTBs)						
a. Reactor Trip Breakers[k]	1,2	2 trains	O	SR 3.3.1.4	NA	NA
	3[a],4[a],5[a]	2 trains	C	SR 3.3.1.4	NA	NA

(a) With Rod Control System capable of rod withdrawal or one or more rods not fully inserted.

(f) The instrument channel setpoint shall be reset to a value within the calibration tolerance of the Trip Setpoint at the completion of the surveillance; otherwise, the channel shall be declared inoperable.

(g) If the instrument channel setpoint is less conservative than the Allowable Value, the setpoint shall be reset consistent with the Trip Setpoint and within 12 hours determine the affected channel is OPERABLE; otherwise, the channel shall be declared inoperable.

(i) Above the P-8 (Power Range Neutron Flux) interlock.

(j) Above the P-7 (Low Power Reactor Trips Block) interlock and below the P-8 (Power Range neutron Flux) interlock.

(k) Including any reactor trip bypass breakers that are racked in and closed for bypassing an RTB.

Table 3.3.1-1 (page 6 of 10)
Reactor Trip System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	TRIP SETPOINT
19. Reactor Trip Breakers (RTBs) (continued)						
b. Reactor Trip Breaker Undervoltage and Shunt Trip Mechanisms	1,2	1 each per RTB	S	SR 3.3.1.4	NA	NA
	3[(a)],4[(a)],5[(a)]	1 each per RTB	C	SR 3.3.1.4	NA	NA
20. Automatic Trip Logic	1,2	2 trains	O	SR 3.3.1.5	NA	NA
	3[(a)],4[(a)],5[(a)]	2 trains	C	SR 3.3.1.5	NA	NA

(a) With Rod Control System capable of rod withdrawal or one or more rods not fully inserted.

Table 3.3.1-1 (page 7 of 10)
Reactor Trip System Instrumentation

Note 1: Overtemperature ΔT

Overtemperature ΔT Trip Setpoint (Those values denoted with [*] are specified in the COLR.)

$$\Delta T \quad \frac{(1+\tau_1 S)}{(1+\tau_2 S)} \left(\frac{1}{1+\tau_3 S}\right) \le \Delta T_0 \ \left\{K_1 - K_2 \frac{(1+\tau_4 S)}{(1+\tau_5 S)} \left[T \frac{1}{(1+\tau_6 S)} - T'\right] + K_3(P - P') - f_1(\Delta I)\right\}$$

Where: ΔT = Measured ΔT by RTD Instrumentation

$\frac{1+\tau_1 S}{1+\tau_2 S}$ = Lead/Lag compensator on measured ΔT; τ_1 = [*]s, τ_2 = [*]s

$\frac{1}{1+\tau_3 S}$ = Lag compensator on measured ΔT; τ_3 = [*]s

ΔT_0 = Indicated ΔT at RATED THERMAL POWER

K_1 = [*];

K_2 = [*]/°F;

$\frac{1+\tau_4 S}{1+\tau_5 S}$ = The function generated by the lead-lag compensator for T_{avg} dynamic compensation;

τ_4 , τ_5 = Time constants utilized in the lead-lag compensator for T_{avg}, τ_4 = [*]s, τ_5 = [*]s;

T = Average temperature, °F;

$\frac{1}{1+\tau_6 S}$ = Lag compensator on measured T_{avg}; τ_6 = [*]s

T′ ≤ [*]°F (Indicated Loop T_{avg} at RATED THERMAL POWER);

K_3 = [*]/psi;

P = Pressurizer pressure, psig;

P’ ≥ [*] psig (Nominal RCS operating pressure);

S = Laplace transform operator, s^{-1};

Table 3.3.1-1 (page 8 of 10)
Reactor Trip System Instrumentation

Note 1: Overtemperature ΔT (continued)

And $f_1(\Delta I)$ is a function of the indicated difference between top and bottom detectors of the power-range neutron ion chambers; with gains to be selected based on measured instrument response during plant startup tests such that:

1. For $q_t - q_b$ between – [*]% and + [*]%, $f1(\Delta I) = 0$, where q_t and q_b are percent RATED THERMAL POWER in the top and bottom halves of the core respectively, and $q_t + q_b$ is total THERMAL POWER in percent of RATED THERMAL POWER;

2. For each percent that the magnitude of $q_t - q_b$ exceeds – [*]%, the ΔT Trip Setpoint shall be automatically reduced by [*]% of its value at RATED THERMAL POWER; and

3. For each percent that the magnitude of $q_t - q_b$ exceeds + [*]%, the ΔT Trip Setpoint shall be automatically reduced by [*]% of its value at RATED THERMAL POWER.

Note 2: Overtemperature ΔT

The Overtemperature ΔT Allowable Value shall not exceed the Trip Setpoint by more than 0.5% ΔT span for the ΔT channel, 0.2% ΔT span for the Pressurizer Pressure channel, and 0.4% ΔT span for the $f(\Delta I)$ channel.

Table 3.3.1-1 (page 9 of 10)
Reactor Trip System Instrumentation

Note 3: Overpower ΔT

Overpower ΔT Trip Setpoint (Those values denoted with [*] are specified in the COLR.)

$$\Delta T \frac{(1+\tau_1 S)}{(1+\tau_2 S)} \left(\frac{1}{1+\tau_3 S}\right) \leq \Delta T_0 \left\{K_4 - K_5 \frac{\tau_7 S}{1+\tau_7 S} \left(\frac{1}{1+\tau_6 S}\right) T - K_6 \left[T \frac{1}{1+\tau_6 S} - T''\right] - f_2(\Delta I)\right\}$$

Where: ΔT = As defined in Note 1,

$\frac{1+\tau_1 S}{1+\tau_2 S}$ = As defined in Note 1,

$\frac{1}{1+\tau_3 S}$ = As defined in Note 1,

ΔT_0 = As defined in Note 1,

K_4 = [*],

K_5 $\geq$ [*]/°F for increasing average temperature and [*]/°F for decreasing average temperature,

$\frac{\tau_7 s}{1+\tau_7 S}$ = The function generated by the lead-lag compensator for T_{avg} dynamic compensation;

τ_7 = Time constants utilized in the lead-lag compensator for T_{avg}, $\tau_7 \geq$ [*] s,

$\frac{1}{1+\tau_6 S}$ = As defined in Note 1,

K_6 = [*]/°F for T > T”

= [*] for T ≤ T”,

Table 3.3.1-1 (page 10 of 10)
Reactor Trip System Instrumentation

Note 3: Overpower ΔT (continued)

T	= As defined in Note 1,
T”	≤ [*]°F (indicated loop T_{avg} at RTP)
S	= As defined in Note 1, and
f_2 (ΔI)	= [*]

Note 4: Overpower ΔT

The Overpower ΔT Allowable Value shall not exceed the Trip Setpoint by more than 0.5% of ΔT span for the ΔT channel.

3.3 INSTRUMENTATION

3.3.2 Engineered Safety Features Actuation System (ESFAS) Instrumentation

LCO 3.3.2 The ESFAS instrumentation for each Function in Table 3.3.2-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.2-1.

ACTIONS

---NOTE---

Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Functions with one or more required channels or trains inoperable.	A.1 Enter the Condition referenced in Table 3.3.2-1 for the channel(s) or train(s).	Immediately
B. One channel or train inoperable.	B.1 Restore channel or train to OPERABLE status.	48 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. One train inoperable.	--------------------NOTE------------------ One train may be bypassed for up to 8 hours for surveillance testing provided the other train is OPERABLE. ---	
	C.1 Restore train to OPERABLE status.	6 hours
D. One train inoperable.	-------------------NOTE------------------- One train may be bypassed for up to 8 hours for surveillance testing provided the other train is OPERABLE. ---	
	D.1 Restore train to OPERABLE status.	6 hours
E. One channel inoperable.	E.1 Place channel in trip.	6 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program
F. One channel or train inoperable.	F.1 Restore channel or train to OPERABLE status.	48 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
G. One channel per bus inoperable.	G.1	Restore channel to OPERABLE status.	48 hours
H. One Main Feedwater Pumps trip channel inoperable.	H.1	Restore channel to OPERABLE status.	48 hours
I. One channel inoperable.	I.1	Place channel in trip.	6 hours
J. One Steam Line Isolation Manual Initiation channel or train inoperable.	J.1	Restore channel or train to OPERABLE status.	48 hours
	<u>OR</u>		
	J.2	Declare associated valve inoperable.	48 hours
K. One or more channels inoperable.	K.1	Verify interlock is in required state for existing unit condition.	1 hour
L. Required Action and associated Completion Time of Conditions B or F not met.	L.1	Be in MODE 3.	6 hours
	<u>AND</u>		
	L.2	-------------- NOTE ------------- LCO 3.0.4.a is not applicable when entering MODE 4. ------------------------------------- Be in MODE 4.	12 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
M. Required Action and associated Completion Time of Conditions D, E, G, I, J, or K not met.	M.1	Be in MODE 3.	6 hours
	<u>AND</u>		
	M.2	Be in MODE 4.	12 hours
N. Required Action and associated Completion Time of Condition H not met.	N.1	Be in MODE 3.	6 hours
O. Required Action and associated Completion Time of Condition C not met.	O.1	Be in MODE 3.	12 hours
	<u>AND</u>		
	O.2	-------------- NOTE ------------- LCO 3.0.4.a is not applicable when entering MODE 4. ------------------------------------- Be in MODE 4.	18 hours

SURVEILLANCE REQUIREMENTS

--NOTE--

Refer to Table 3.3.2-1 to determine which SRs apply for each ESFAS Function.

SURVEILLANCE		FREQUENCY
SR 3.3.2.1	------------------------------NOTE------------------------------ Not required to be performed until 96 hours after entering MODE 3. -- Perform CHANNEL CHECK.	In accordance with the Surveillance Frequency Control Program
SR 3.3.2.2	------------------------------NOTE------------------------------ Not required to be performed for Functions 1.b and 4.b, until 96 hours after entering MODE 3. -- Perform ACTUATION LOGIC TEST.	In accordance with the Surveillance Frequency Control Program
SR 3.3.2.3	Perform COT.	In accordance with the Surveillance Frequency Control Program
SR 3.3.2.4	------------------------------NOTE------------------------------ Verification of relay setpoints not required. -- Perform TADOT.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.2.5	------------------------------NOTE------------------------------ Verification of setpoint not required for manual initiation functions. -- Perform TADOT.	 In accordance with the Surveillance Frequency Control Program
SR 3.3.2.6	------------------------------NOTE------------------------------ This Surveillance shall include verification that the time constants are adjusted to the prescribed values. -- Perform CHANNEL CALIBRATION.	 In accordance with the Surveillance Frequency Control Program

Table 3.3.2-1 (page 1 of 7)
Engineered Safety Feature Actuation System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	TRIP SETPOINT
1. Safety Injection						
a. Manual Initiation	1,2,3,4	2	B	SR 3.3.2.5	NA	NA
b. Automatic Actuation Logic and Actuation Relays	1,2,3,4	2 trains	C	SR 3.3.2.2	NA	NA
c. Containment Pressure - High	1,2,3	3	E	SR 3.3.2.2 SR 3.3.2.6(b)(c)	≤ 4.5 psig	≤ 4.0 psig
d. Pressurizer Pressure - Low	1,2,3(a)	3	E	SR 3.3.2.1 SR 3.3.2.3(b)(c) SR 3.3.2.6(b)(c)	≥ 1712 psig	≥ 1730 psig
e. High Differential Pressure Between Steam Line Header and any Steam Generator (SG)	1,2,3(a)	3 per steam line	E	SR 3.3.2.1 SR 3.3.2.3(b)(c) SR 3.3.2.6(b)(c)	≤ 114 psi	≤ 100 psi

(a) Above the P-11 (Pressurizer Pressure) interlock.

(b) The instrument channel setpoint shall be reset to a value within the calibration tolerance of the Trip Setpoint at the completion of the surveillance; otherwise, the channel shall be declared inoperable.

(c) If the instrument channel setpoint is less conservative than the Allowable Value, the setpoint shall be reset consistent with the Trip Setpoint and within 12 hours determine the affected channel is OPERABLE; otherwise, the channel shall be declared inoperable.

Table 3.3.2-1 (page 2 of 7)
Engineered Safety Feature Actuation System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	TRIP SETPOINT
1. Safety Injection (continued)						
f. Steam Line Flow - High	1,2,3$^{(d)}$	2 per steam line	E	SR 3.3.2.1 SR 3.3.2.3$^{(g)(h)}$ SR 3.3.2.6$^{(g)(h)}$	(e)	(f)
Coincident with T_{avg} - Low	1,2,3$^{(d)}$	1 per loop	E	SR 3.3.2.1 SR 3.3.2.3$^{(b)(c)}$ SR 3.3.2.6$^{(b)(c)}$	≥ 542.5°F	≥ 543.0°F
g. Steam Line Flow - High	1,2,3$^{(d)}$	2 per steam line	E	SR 3.3.2.1 SR 3.3.2.3$^{(g)(h)}$ SR 3.3.2.6$^{(g)(h)}$	(e)	(f)
Coincident with Steam Generator Pressure – Low	1,2,3$^{(d)}$	1 per SG	E	SR 3.3.2.1 SR 3.3.2.3$^{(g)(h)}$ SR 3.3.2.6$^{(g)(h)}$	≥ 607 psig$^{(i)}$	614 psig$^{(i)}$
2. Containment Spray						
a. Automatic Actuation Logic and Actuation Relays	1,2,3,4	2 trains	C	SR 3.3.2.2	NA	NA

(b) The instrument channel setpoint shall be reset to a value within the calibration tolerance of the Trip Setpoint at the completion of the surveillance; otherwise, the channel shall be declared inoperable.

(c) If the instrument channel setpoint is less conservative than the Allowable Value, the setpoint shall be reset consistent with the Trip Setpoint and within 12 hours determine the affected channel is OPERABLE; otherwise, the channel shall be declared inoperable.

(d) Above the (T_{avg} - Low) interlock.

(e) Less than or equal to a function defined as ΔP corresponding to 41.2% steam flow at 0% load, and increasing linearly from 20% load to 114.4% steam flow at 100% load.

(f) Less than or equal to a function defined as ΔP corresponding to 40.0% steam flow at 0% load, and increasing linearly from 20% load to 114.0% steam flow at 100% load.

(g) If the as-found channel setpoint is outside its predefined as-found tolerance, then the channel shall be evaluated to verify that it is functioning as required before returning the channel to service.

(h) The instrument channel setpoint shall be reset to a value that is within the as-left tolerance around the Nominal Trip Setpoint (NTSP) at the completion of the surveillance; otherwise, the channel shall be declared inoperable. Setpoints more conservative than the NTSP are acceptable provided that the as-found and as-left tolerances apply to the actual setpoint implemented in the Surveillance procedures (field setting) to confirm channel performance. The NTSP and the methodologies used to determine the as-found and as-left tolerances are specified in UFSAR Section 7.2.

(i) Time constants used in the lead/lag controller are t_1 ≥ 50 seconds and t_2 ≤ 5 seconds.

Table 3.3.2-1 (page 3 of 7)
Engineered Safety Feature Actuation System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	TRIP SETPOINT
2. Containment Spray (continued)						
b. Containment Pressure - High High	1,2,3	3	E	SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.6(b)(c)	≤ 22.6 psig	≤ 20.0 psig
Coincident with Containment Pressure – High	1,2,3	3	E	SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.6(b)(c)	≤ 4.5 psig	≤ 4.0 psig
3. Containment Isolation						
a. Phase A Isolation						
(1) Manual Initiation	1,2,3,4	2	B	SR 3.3.2.5	NA	NA
(2) Automatic Actuation Logic and Actuation Relays	1,2,3,4	2 trains	C	SR 3.3.2.2	NA	NA
(3) Safety Injection	Refer to Function 1 (Safety Injection) for all initiation functions and requirements.					
b. Phase B Isolation						
(1) Manual Initiation	1,2,3,4	2	F	SR 3.3.2.5	NA	NA
(2) Automatic Actuation Logic and Actuation Relays	1,2,3,4	2 trains	C	SR 3.3.2.2	NA	NA

(b) The instrument channel setpoint shall be reset to a value within the calibration tolerance of the Trip Setpoint at the completion of the surveillance; otherwise, the channel shall be declared inoperable.

(c) If the instrument channel setpoint is less conservative than the Allowable Value, the setpoint shall be reset consistent with the Trip Setpoint and within 12 hours determine the affected channel is OPERABLE; otherwise, the channel shall be declared inoperable.

Table 3.3.2-1 (page 4 of 7)
Engineered Safety Feature Actuation System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	TRIP SETPOINT
3. Containment Isolation						
b. Phase B Isolation (continued)						
(3) Containment Pressure High High	1,2,3	3	I	SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.6[(b)(c)]	≤ 22.6 psig	≤ 20.0 psig
Coincident with Containment Pressure - High	1,2,3	3	I	SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.6[(b)(c)]	≤ 4.5 psig	≤ 4.0 psig
4. Steam Line Isolation						
a. Manual Initiation	1,2[(j)],3[(j)]	1 per steam line	J	SR 3.3.2.5	NA	NA
b. Automatic Actuation Logic and Actuation Relays	1,2[(j)],3[(j)]	2 trains	D	SR 3.3.2.2	NA	NA
c. Containment Pressure - High - High	1,2[(j)],3[(j)]	3	I	SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.6[(b)(c)]	≤ 22.6 psig	≤ 20.0 psig
Coincident with Containment Pressure – High	1,2[(j)],3[(j)]	3	I	SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.6[(b)(c)]	≤ 4.5 psig	≤ 4.0 psig

(b) The instrument channel setpoint shall be reset to a value within the calibration tolerance of the Trip Setpoint at the completion of the surveillance; otherwise, the channel shall be declared inoperable.

(c) If the instrument channel setpoint is less conservative than the Allowable Value, the setpoint shall be reset consistent with the Trip Setpoint and within 12 hours determine the affected channel is OPERABLE; otherwise, the channel shall be declared inoperable.

(j) Except when all MSIVs are closed and deactivated.

Table 3.3.2-1 (page 5 of 7)
Engineered Safety Feature Actuation System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	TRIP SETPOINT
4. Steam Line Isolation (continued)						
d. Steam Line Flow – High	1,2[(j)],3[(j)]	2 per steam line	I	SR 3.3.2.1 SR 3.3.2.3[(g)(h)] SR 3.3.2.6[(g)(h)]	(e)	(f)
Coincident with T_{avg} – Low	1,2[(j)],3[(j)]	1 per loop	E	SR 3.3.2.1 SR 3.3.2.3[(b)(c)] SR 3.3.2.6[(b)(c)]	≥ 542.5°F	≥ 543.0°F
e. Steam Line Flow – High	1,2[(j)],3[(j)]	2 per steam line	I	SR 3.3.2.1 SR 3.3.2.3[(g)(h)] SR 3.3.2.6[(g)(h)]	(e)	(f)
Coincident with Steam Generator Pressure – Low	1,2[(j)],3[(j)]	1 per SG	I	SR 3.3.2.1 SR 3.3.2.3[(g)(h)] SR 3.3.2.6[(g)(h)]	≥ 607 psig[(i)]	614 psig[(i)]

(b) The instrument channel setpoint shall be reset to a value within the calibration tolerance of the Trip Setpoint at the completion of the surveillance; otherwise, the channel shall be declared inoperable.

(c) If the instrument channel setpoint is less conservative than the Allowable Value, the setpoint shall be reset consistent with the Trip Setpoint and within 12 hours determine the affected channel is OPERABLE; otherwise, the channel shall be declared inoperable.

(e) Less than or equal to a function defined as ΔP corresponding to 41.2% steam flow at 0% load, and increasing linearly from 20% load to 114.4% steam flow at 100% load.

(f) Less than or equal to a function defined as ΔP corresponding to 40.0% steam flow at 0% load, and increasing linearly from 20% load to 114.0% steam flow at 100% load.

(g) If the as-found channel setpoint is outside its predefined as-found tolerance, then the channel shall be evaluated to verify that it is functioning as required before returning the channel to service.

(h) The instrument channel setpoint shall be reset to a value that is within the as-left tolerance around the Nominal Trip Setpoint (NTSP) at the completion of the surveillance; otherwise, the channel shall be declared inoperable. Setpoints more conservative than the NTSP are acceptable provided that the as-found and as-left tolerances apply to the actual setpoint implemented in the Surveillance procedures (field setting) to confirm channel performance. The NTSP and the methodologies used to determine the as-found and as-left tolerances are specified in UFSAR Section 7.2.

(i) Time constants used in the lead/lag controller are $t_1 \geq 50$ seconds and $t_2 \leq 5$ seconds.

(j) Except when all MSIVs are closed and deactivated.

Table 3.3.2-1 (page 6 of 7)
Engineered Safety Feature Actuation System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	TRIP SETPOINT
5. Feedwater Isolation						
a. Automatic Actuation Logic and Actuation Relays	1,2(k),3(k)	2 trains	D	SR 3.3.2.2	NA	NA
b. SG Water Level – High High	1,2(k),3(k)	3 per SG	I	SR 3.3.2.1 SR 3.3.2.3(g)(h) SR 3.3.2.6(g)(h)	≤ 80.5%	80.0%
c. Safety Injection	Refer to Function 1 (Safety Injection) for all initiation functions and requirements.					
6. Auxiliary Feedwater						
a. Automatic Actuation Logic and Actuation Relays	1,2,3	2 trains	D	SR 3.3.2.2	NA	NA
b. SG Water Level - Low Low	1,2,3	3 per SG	E	SR 3.3.2.1 SR 3.3.2.3(g)(h) SR 3.3.2.6(g)(h)	≥ 15.5%	16.0%
c. Safety Injection	Refer to Function 1 (Safety Injection) for all initiation functions and requirements.					
d. Bus Stripping	1,2,3	1 per bus	G	SR 3.3.2.4 SR 3.3.2.6	NA	See LCO 3.3.5, “LOP EDG Start Instrumentation,” for Trip Setpoints
e. Trip of all Main Feedwater Pumps Breakers	1,2	1 per breaker	H	SR 3.3.2.4	NA	NA

(g) If the as-found channel setpoint is outside its predefined as-found tolerance, then the channel shall be evaluated to verify that it is functioning as required before returning the channel to service.

(h) The instrument channel setpoint shall be reset to a value that is within the as-left tolerance around the Nominal Trip Setpoint (NTSP) at the completion of the surveillance; otherwise, the channel shall be declared inoperable. Setpoints more conservative than the NTSP are acceptable provided that the as-found and as-left tolerances apply to the actual setpoint implemented in the Surveillance procedures (field setting) to confirm channel performance. The NTSP and the methodologies used to determine the as-found and as-left tolerances are specified in UFSAR Section 7.2.

(k) Except when all MFIVs, MFRVs, and associated bypass valves are closed and de-activated or isolated by a closed manual valve.

Table 3.3.2-1 (page 7 of 7)
Engineered Safety Feature Actuation System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	TRIP SETPOINT
7. ESFAS Interlocks						
a. Pressurizer Pressure, P-11	1,2,3	2	K	SR 3.3.2.3 SR 3.3.2.6	≤ 2018 psig	Nominal 2000 psig
b. T_{avg} - Low	1,2,3	2	K	SR 3.3.2.3 SR 3.3.2.6	≥ 542.5°F	Nominal 543 psig

3.3 INSTRUMENTATION

3.3.3 Post Accident Monitoring (PAM) Instrumentation

LCO 3.3.3 The PAM instrumentation for each Function in Table 3.3.3-1 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

---NOTE---

Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Functions with one required channel inoperable.	A.1 Restore one channel to OPERABLE status.	30 days
B. Required Action and associated Completion Time of Condition A not met.	B.1 Initiate action in accordance with Specification 5.6.4.	Immediately
C. One or more Functions with two required channels inoperable.	C.1 Restore one channel to OPERABLE status.	7 days
D. Required Action and associated Completion Time of Condition C not met.	D.1 Enter the Condition referenced in Table 3.3.3-1 for the channel.	Immediately

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. As required by Required Action D.1 and referenced in Table 3.3.3-1.	E.1 Be in MODE 3. AND E.2 Be in MODE 4.	6 hours 12 hours
F. As required by Required Action D.1 and referenced in Table 3.3.3-1.	F.1 Initiate action in accordance with Specification 5.6.4.	Immediately

SURVEILLANCE REQUIREMENTS

--NOTE--

SR 3.3.3.1 and SR 3.3.3.2 apply to each PAM instrumentation Function in Table 3.3.3-1.

SURVEILLANCE		FREQUENCY
SR 3.3.3.1	Perform CHANNEL CHECK for each required instrumentation channel that is normally energized.	In accordance with the Surveillance Frequency Control Program
SR 3.3.3.2	-------------------------------NOTE------------------------------- Neutron detectors are excluded from CHANNEL CALIBRATION. -- Perform CHANNEL CALIBRATION.	In accordance with the Surveillance Frequency Control Program

Table 3.3.3-1 (page 1 of 1)
Post Accident Monitoring Instrumentation

	FUNCTION	REQUIRED CHANNELS	CONDITION REFERENCED FROM REQUIRED ACTION D.1
1.	Neutron Flux (Wide Range)	2	E
2.	Containment Pressure (Narrow Range)	2	E
3.	Reactor Coolant System (RCS) T_{HOT} Temperature (Wide Range)	2	E
4.	RCS T_{COLD} Temperature (Wide Range)	2	E
5.	RCS Pressure (Wide Range)	2	E
6.	Reactor Vessel Level Monitoring System	2	F
7.	Containment Water Level (Wide Range)	2	E
8.	Containment Pressure (Wide Range)	2	E
9.	Penetration Flow Path Containment Isolation Valve Position	2 per penetration flow path[(a)(b)]	E
10.	Containment Area Radiation (High Range)	2	F
11.	Pressurizer Water Level	2	E
12.	Steam Generator Water Level (Narrow Range)	2 per steam generator	E
13.	Condensate Storage Tank Level	2	E
14.	Core Exit Temperature – Quadrant 1	2[(c)]	E
15.	Core Exit Temperature – Quadrant 2	2[(c)]	E
16.	Core Exit Temperature – Quadrant 3	2[(c)]	E
17.	Core Exit Temperature – Quadrant 4	2[(c)]	E
18.	RWST Water Level	2	E
19.	Steam Generator Pressure	2 per steam generator	E
20.	Emergency Diesel Generator (EDG) Output	1 per required EDG	N/A
21.	4 kV Bus Voltage	1 per required bus	N/A
22.	Safety Injection Pump Status	1 per required pump	N/A

(a) Not required for isolation valves whose associated penetration is isolated by at least one closed and deactivated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured.

(b) Only one position indication channel is required for penetration flow paths with only one installed control room indication channel.

(c) A channel consists of two core exit thermocouples (CETs).

3.3 INSTRUMENTATION

3.3.4 Control Room Emergency Ventilation System (CREVS) Actuation Instrumentation

LCO 3.3.4 The CREVS actuation instrumentation in Table 3.3.4-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.4-1.

ACTIONS

---NOTE---
Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One channel inoperable.	A.1 Place CREVS in recirculation mode.	7 days
B. Two channels inoperable.	B.1.1 Place CREVS in recirculation mode.	Immediately
	<u>AND</u>	
	B.1.2 Restore one channel to OPERABLE status.	7 days
	<u>OR</u>	
	B.2 Place CREVS in recirculation mode with both control room emergency recirculating fans operating.	7 days

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
C. Required Action and associated Completion Time for Condition A or B not met in MODE 1, 2, 3, or 4.	C.1	Be in MODE 3.	6 hours
	AND		
	C.2	--------------NOTE-------------- LCO 3.0.4.a is not applicable when entering MODE 4. -------------------------------------	
		Be in MODE 4.	12 hours
D. Required Action and associated Completion Time for Condition A or B not met during movement of irradiated fuel assemblies within containment.	D.1	Suspend movement of irradiated fuel assemblies within containment.	Immediately

SURVEILLANCE REQUIREMENTS

---NOTE---
Refer to Table 3.3.4-1 to determine which SRs apply for each CREVS Actuation Function.

SURVEILLANCE		FREQUENCY
SR 3.3.4.1	Perform CHANNEL CHECK.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.4.2	Perform COT.	In accordance with the Surveillance Frequency Control Program
SR 3.3.4.3	Perform CHANNEL CALIBRATION.	In accordance with the Surveillance Frequency Control Program

Table 3.3.4-1 (page 1 of 1)
CREVS Actuation Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	TRIP SETPOINT
1. Control Room Air Intake Radiation Level	1, 2, 3, 4, 5, 6, (a)	2	SR 3.3.4.1 SR 3.3.4.2[(b)(c)] SR 3.3.4.3[(b)(c)]	≤ 2.83 mR/hr	≤ 2.00 mR/hr
2. Containment Isolation Manual Phase A or Manual Phase B	Refer to LCO 3.3.2, "ESFAS Instrumentation," Function 3, for manual initiation functions and requirements.				
3. Safety Injection	Refer to LCO 3.3.2, Function 1, for all initiation functions and requirements.				

(a) During movement of irradiated fuel assemblies within containment.

(b) The instrument channel setpoint shall be reset to a value within the calibration tolerance of the Trip Setpoint at the completion of the surveillance; otherwise, the channel shall be declared inoperable.

(c) If the instrument channel setpoint is less conservative than the Allowable Value, the setpoint shall be reset consistent with the Trip Setpoint and within 12 hours determine the affected channel is OPERABLE; otherwise, the channel shall be declared inoperable.

3.3 INSTRUMENTATION

3.3.5 Loss of Power (LOP) Emergency Diesel Generator (EDG) Start Instrumentation

LCO 3.3.5 Two channels per bus of the LOP EDG start instrumentation for each Function in Table 3.3.5-1 shall be OPERABLE for each EDG required by LCO 3.8.1, "AC Sources – Operating."

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

--NOTE--
Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Functions with one channel inoperable.	A.1 --------------NOTE-------------- Inoperable channel of one load center may be bypassed for up to 8 hours for surveillance testing of other channels. ------------------------------------ Place channel in trip.	6 hours
B. One or more Functions with two channels per bus inoperable.	B.1 --------------NOTE-------------- Both channels of one load center may be bypassed for up to 8 hours for surveillance testing. ------------------------------------ Restore one channel per bus to OPERABLE status.	1 hour

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
C. Required Action and associated Completion Time not met.	C.1	Enter applicable Condition(s) and Required Action(s) for the associated EDG made inoperable by LOP EDG start instrumentation.	Immediately

SURVEILLANCE REQUIREMENTS

---NOTE---

Refer to Table 3.3.5-1 to determine which SRs apply for each LOP EDG Start Function.

SURVEILLANCE		FREQUENCY
SR 3.3.5.1	Perform CHANNEL CHECK.	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.2	Perform TADOT.	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.3	Perform CHANNEL CALIBRATION.	In accordance with the Surveillance Frequency Control Program

Table 3.3.5-1 (page 1 of 1)
Loss of Power (LOP) Emergency Diesel Generator (EDG) Start Instrumentation

FUNCTION	SURVEILLANCE REQUIREMENTS	TRIP SETPOINT
1. 4.16 kV Busses A and B (Loss of Voltage)		
a. Bus Undervoltage	SR 3.3.5.2 SR 3.3.5.3	NA
2. 480V Load Centers (Undervoltage)		
a. Bus Undervoltage	SR 3.3.5.1 SR 3.3.5.2 SR 3.3.5.3	
1) Load centers 3A and 4D		$\geq$ 427V and $\leq$ 433V
2) Load center 3B		$\geq$ 435V and $\leq$ 441V
3) Load centers 3C, 3D, 4B and 4C		$\geq$ 431V and $\leq$ 437V
4) Load center 4A		$\geq$ 432V and $\leq$ 438V
b. Time Delay – Load centers 3A, 3B, 3C, 3D, 4A, 4B, 4C, and 4D	SR 3.3.5.1 SR 3.3.5.2 SR 3.3.5.3	$\geq$ 9 and $\leq$ 11 seconds
3. 480V Load Centers (Degraded Voltage)		
a. Bus Undervoltage	SR 3.3.5.1 SR 3.3.5.2 SR 3.3.5.3	
1) Load center 3A		$\geq$ 421V and $\leq$ 427V
2) Load center 3B		$\geq$ 424V and $\leq$ 430V
3) Load center 3C		$\geq$ 434V and $\leq$ 440V
4) Load center 3D		$\geq$ 432V and $\leq$ 438V
5) Load center 4A		$\geq$ 427V and $\leq$ 433V
6) Load center 4B		$\geq$ 433V and $\leq$ 439V
7) Load center 4C and 4D		$\geq$ 431V and $\leq$ 437V
b. Time Delay – Load centers 3A, 3B, 3C, 3D, 4A, 4B, 4C, and 4D	SR 3.3.5.1 SR 3.3.5.2 SR 3.3.5.3	$\geq$ 30 and $\leq$ 90 seconds

3.3 INSTRUMENTATION

3.3.6 Containment Ventilation Isolation Instrumentation

LCO 3.3.6 The Containment Ventilation Isolation instrumentation for each Function in Table 3.3.6-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.6-1.

ACTIONS

--NOTE--

Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. ------------NOTE------------ Only applicable in MODE 1, 2, 3, or 4. -------------------------------- One or more Functions with one or more manual or automatic actuation trains inoperable. <u>OR</u> Required radiation monitoring channel inoperable.	A.1 Enter applicable Conditions and Required Actions of LCO 3.6.3, "Containment Isolation Valves," for instrument air bleed valves made inoperable by isolation instrumentation. <u>AND</u> A.2 Enter applicable Conditions and Required Actions of LCO 3.4.15, "RCS Leakage Detection Instrumentation."	Immediately Immediately

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
B. ------------NOTE------------ Only applicable during movement of recently irradiated fuel assemblies within containment. --------------------------------- One or more Functions with one or more manual or automatic actuation trains inoperable. <u>OR</u> Required radiation monitoring channels inoperable.	B.1	Enter applicable Conditions and Required Actions of LCO 3.9.4, "Containment Penetrations," for containment purge and exhaust isolation valves and instrument air bleed valves made inoperable by isolation instrumentation.	Immediately

SURVEILLANCE REQUIREMENTS

---NOTE---

Refer to Table 3.3.6-1 to determine which SRs apply for each Containment Ventilation Isolation Function.

SURVEILLANCE		FREQUENCY
SR 3.3.6.1	Perform CHANNEL CHECK.	In accordance with the Surveillance Frequency Control Program
SR 3.3.6.2	Perform COT.	In accordance with the Surveillance Frequency Control Program
SR 3.3.6.3	Perform CHANNEL CALIBRATION.	In accordance with the Surveillance Frequency Control Program

Table 3.3.6-1 (page 1 of 2)
Containment Ventilation Isolation Instrumentation

	FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	TRIP SETPOINT
1.	Containment Isolation Phase A and Phase B					
	a. Manual Initiation	See LCO 3.3.2, "ESFAS Instrumentation," Table 3.3.2-1, Items 3.a.1 and 3.a.2, 3.a.3, 3.b.1, and 3.b.2 for containment ventilation isolation requirements.				
	b. Automatic Actuation Logic and Actuation Relays					
	c. Safety Injection					
2.	Containment Radiation					
	a. Gaseous	1(a),2(a) 3(a),4(a), (b)	1(c)	SR 3.3.6.1 SR 3.3.6.2(d)(e) SR 3.3.6.3(d)(e)	Refer to Note 1 (Page 3.3.6-5)	Refer to Note 1 (Page 3.3.6-5)
	b. Particulate	1(a),2(a) 3(a),4(a), (b)	1(c)	SR 3.3.6.1 SR 3.3.6.2(d)(e) SR 3.3.6.3(d)(e)	≤ 5.00×10^{-6} μCi/cc	≤ 4.49×10^{-6} μCi/cc

(a) Not applicable to containment purge supply and exhaust isolation valves.

(b) During movement of recently irradiated fuel assemblies within containment.

(c) Only one channel of either particulate or gaseous radioactivity channel is required.

(d) The instrument channel setpoint shall be reset to a value within the calibration tolerance of the Trip Setpoint at the completion of the surveillance; otherwise, the channel shall be declared inoperable.

(e) If the instrument channel setpoint is less conservative than the Allowable Value, the setpoint shall be reset consistent with the Trip Setpoint and within 12 hours determine the affected channel is OPERABLE; otherwise, the channel shall be declared inoperable.

Table 3.3.6-1 (page 2 of 2)
Containment Ventilation Isolation Instrumentation

Note 1: Containment Radiation – Gaseous

Containment Gaseous Monitor Trip Setpoint = $\frac{(1.11 \times 10^{-3})}{(\quad F \quad)}$ μCi/cc,

Containment Gaseous Monitor Allowable Value = $\frac{(1.22 \times 10^{-3})}{(\quad F \quad)}$ μCi/cc,

Where F = $\frac{\text{Actual Purge Flow}}{\text{Design Purge Flow (35,000 CFM)}}$

Setpoint may vary according to current plant conditions provided that the release rate does not exceed allowable limits provided in the Offsite Dose Calculation Manual.

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.1 RCS Pressure, Temperature, and Flow Departure from Nucleate Boiling (DNB) Limits

LCO 3.4.1 RCS DNB parameters for pressurizer pressure, RCS average temperature, and RCS total flow rate shall be within the limits specified below:

a. Pressurizer pressure is greater than or equal to the limit specified in the COLR;

b. RCS average temperature is less than or equal to the limit specified in the COLR; and

c. RCS total flow rate ≥ 270,000 gpm and greater than or equal to the limit specified in the COLR.

APPLICABILITY: MODE 1.

---NOTE---
Pressurizer pressure limit does not apply during:

a. THERMAL POWER ramp > 5% RTP per minute; or

b. THERMAL POWER step > 10% RTP.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more RCS DNB parameters not within limits.	A.1 Restore RCS DNB parameter(s) to within limit.	2 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 2.	6 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.4.1.1	Verify pressurizer pressure is greater than or equal to the limit specified in the COLR.	In accordance with the Surveillance Frequency Control Program
SR 3.4.1.2	Verify RCS average temperature is less than or equal to the limit specified in the COLR.	In accordance with the Surveillance Frequency Control Program
SR 3.4.1.3	Verify RCS total flow rate is ≥ 270,000 gpm and greater than or equal to the limit specified in the COLR.	In accordance with the Surveillance Frequency Control Program
SR 3.4.1.4	------------------------------NOTE------------------------------ Not required to be performed until 24 hours after ≥ 90% RTP. --- Verify by precision heat balance that RCS total flow rate is ≥ 270,000 gpm and greater than or equal to the limit specified in the COLR.	In accordance with the Surveillance Frequency Control Program

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.2 RCS Minimum Temperature for Criticality

LCO 3.4.2 Each RCS loop average temperature (T_{avg}) shall be ≥ 541°F.

APPLICABILITY: MODE 1,
MODE 2 with k_{eff} ≥ 1.0.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. T_{avg} in one or more RCS loops not within limit.	A.1 Be in MODE 2 with k_{eff} < 1.0.	30 minutes

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.4.2.1 Verify RCS T_{avg} in each loop ≥ 541°F.	In accordance with the Surveillance Frequency Control Program

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.3 RCS Pressure and Temperature (P/T) Limits

LCO 3.4.3 RCS pressure, RCS temperature, and RCS heatup and cooldown rates shall be maintained within the limits specified in Figures 3.4.3-1 and 3.4.3-2 with:

a. A maximum heatup of 100°F in any 1-hour period;

b. A maximum cooldown of 100°F in any 1-hour period;

c. A maximum temperature change of 5°F in any 1-hour period during inservice hydrostatic and leak testing operations above the heatup and cooldown limit curves.

APPLICABILITY: At all times.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. ------------NOTE------------ Required Action A.2 shall be completed whenever this Condition is entered. --------------------------------- Requirements of LCO not met in MODE 1, 2, 3, or 4.	A.1 Restore parameter(s) to within limits. <u>AND</u> A.2 Determine RCS is acceptable for continued operation.	30 minutes 72 hours
B. Required Action and associated Completion Time of Condition A not met.	B.1 Be in MODE 3. <u>AND</u> B.2 Be in MODE 5 with RCS pressure < 500 psig.	6 hours 36 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. ------------NOTE------------ Required Action C.2 shall be completed whenever this Condition is entered. -------------------------------- Requirements of LCO not met any time in other than MODE 1, 2, 3, or 4.	C.1 Initiate action to restore parameter(s) to within limits. <u>AND</u> C.2 Determine RCS is acceptable for continued operation.	Immediately Prior to entering MODE 4

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.4.3.1	------------------------------NOTE----------------------------- Only required to be performed during RCS heatup and cooldown operations and RCS inservice leak and hydrostatic testing. --- Verify RCS pressure, RCS temperature, and RCS heatup and cooldown rates are within limits.	In accordance with the Surveillance Frequency Control Program

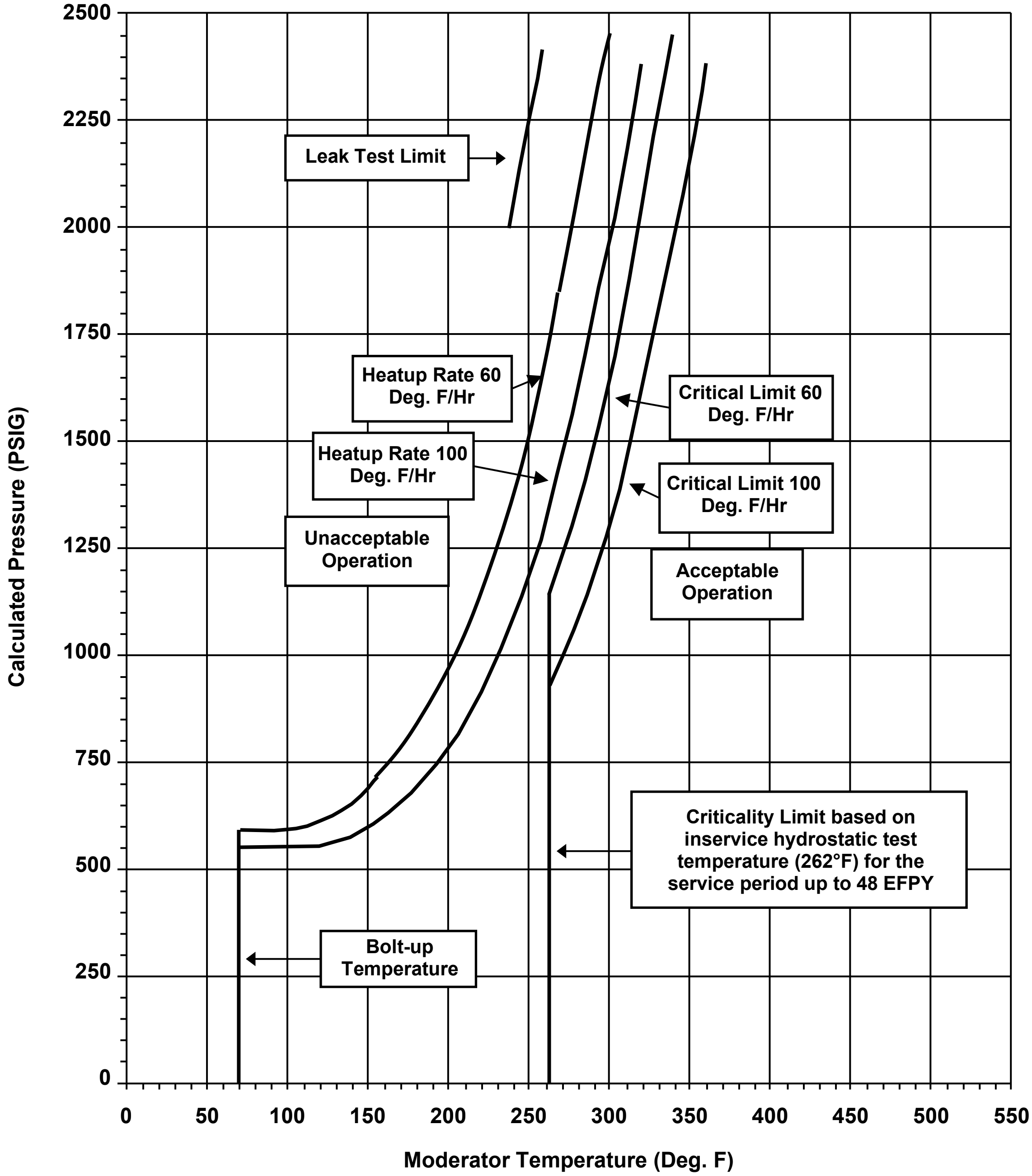


Figure 3.4.3-1 (page 1 of 1)
Reactor Coolant System Heatup Limitations (Heatup Rates of 60 and 100°F/hr)
Applicable for 48 EFPY (Without Margins for Instrumentation Errors)

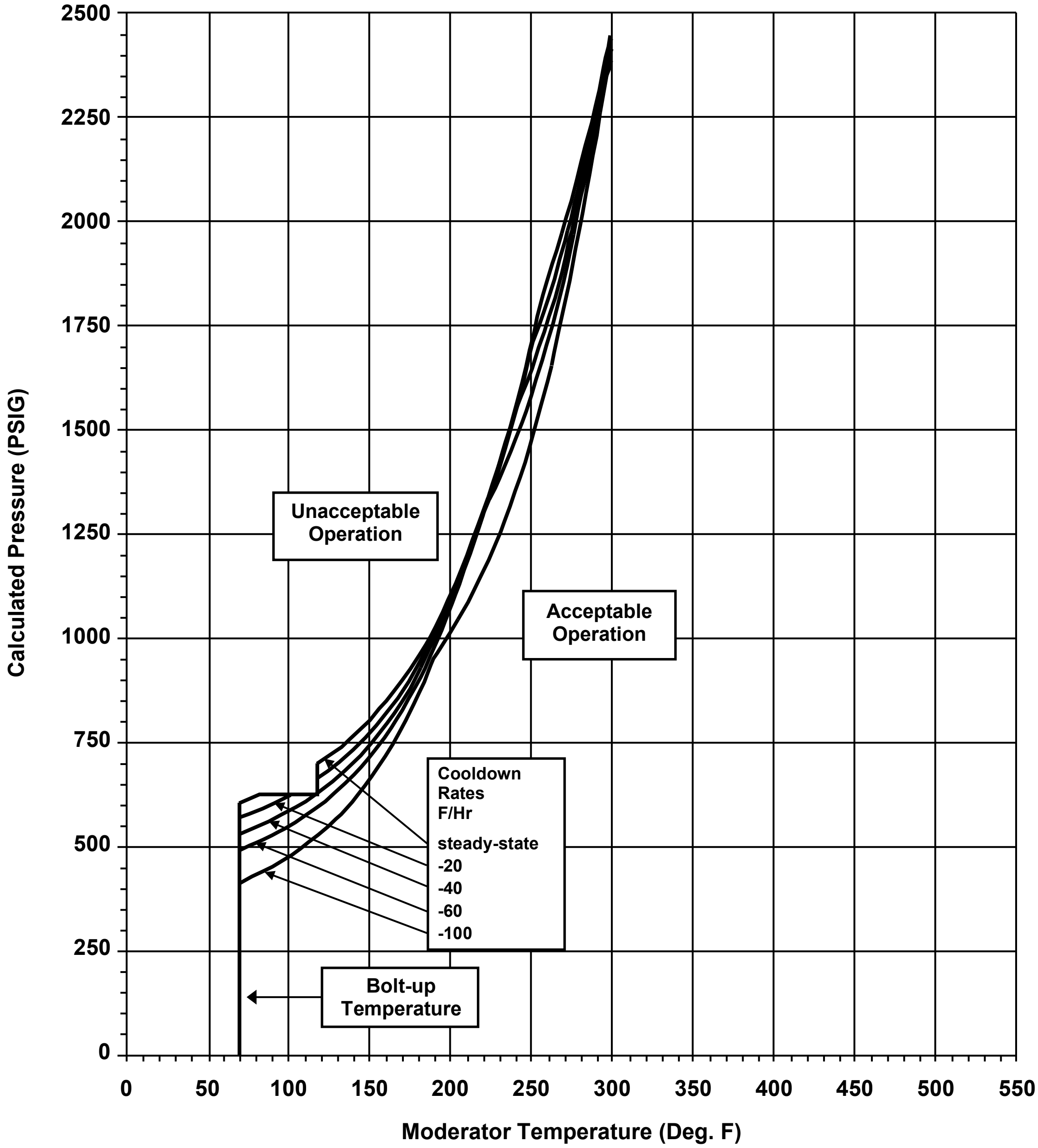


Figure 3.4.3-2 (page 1 of 1)
Reactor Coolant System Cooldown Limitations (Cooldown Rates of 0, 20, 40, 60 and 100°F/hr)
Applicable for 48 EFPY (Without Margins for Instrumentation Errors)

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.4 RCS Loops - MODES 1 and 2

LCO 3.4.4 Three RCS loops shall be OPERABLE and in operation.

APPLICABILITY: MODES 1 and 2.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Requirements of LCO not met.	A.1 Be in MODE 3.	6 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.4.4.1	Verify each RCS loop is in operation.	In accordance with the Surveillance Frequency Control Program

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.5 RCS Loops - MODE 3

LCO 3.4.5 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.

---NOTE---
All reactor coolant pumps may be removed from operation for ≤ 1 hour per 8 hour period provided:

a. No operations are permitted that would cause introduction of coolant into the RCS with boron concentration less than required to meet the SDM of LCO 3.1.1; and

b. Core outlet temperature is maintained at least 10°F below saturation temperature.

APPLICABILITY: MODE 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required RCS loop inoperable.	A.1 Restore required RCS loop to OPERABLE status.	72 hours
B. Required Action and associated Completion Time of Condition A not met.	B.1 Be in MODE 4.	12 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
C. One required RCS loop not in operation with Rod Control System capable of rod withdrawal.	C.1	Restore required RCS loop to operation.	1 hour
	OR		
	C.2	Place the Rod Control System in a condition incapable of rod withdrawal.	1 hour
D. Two required RCS loops inoperable. OR No RCS loops in operation.	D.1	Place the Rod Control System in a condition incapable of rod withdrawal.	Immediately
	AND		
	D.2	Suspend operations that would cause introduction of coolant into the RCS with boron concentration less than required to meet SDM of LCO 3.1.1.	Immediately
	AND		
	D.3	Initiate action to restore one RCS loop to OPERABLE status and operation.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.4.5.1	Verify required RCS loops are in operation.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.4.5.2	Verify steam generator secondary side water levels are ≥ 10% for required RCS loops.	In accordance with the Surveillance Frequency Control Program
SR 3.4.5.3	------------------------------NOTE------------------------------ Not required to be performed until 24 hours after a required pump is not in operation. -- Verify correct breaker alignment and indicated power are available to each required pump.	In accordance with the Surveillance Frequency Control Program

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.6 RCS Loops - MODE 4

LCO 3.4.6 Two loops consisting of any combination of RCS loops and residual heat removal (RHR) loops shall be OPERABLE, and one loop shall be in operation.

---NOTES---

1. All reactor coolant pumps (RCPs) and RHR pumps may be removed from operation for ≤ 1 hour per 8 hour period provided:

   a. No operations are permitted that would cause introduction of coolant into the RCS with boron concentration less than required to meet the SDM of LCO 3.1.1; and

   b. Core outlet temperature is maintained at least 10°F below saturation temperature.

2. No RCP shall be started with any RCS cold leg temperature ≤ 275°F unless the secondary side water temperature of each steam generator (SG) is ≤ 50°F above each of the RCS cold leg temperatures.

APPLICABILITY: MODE 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required loop inoperable.	A.1 Initiate action to restore a second loop to OPERABLE status. AND	Immediately

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.2 --------------NOTE-------------- Only required if RHR loop is OPERABLE. ------------------------------------- Be in MODE 5.	24 hours
B. Two required loops inoperable. OR Required loop not in operation.	B.1 Suspend operations that would cause introduction of coolant into the RCS with boron concentration less than required to meet SDM of LCO 3.1.1. AND B.2 Initiate action to restore one loop to OPERABLE status and operation.	Immediately Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.4.6.1	Verify required RHR or RCS loop is in operation.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.4.6.2	Verify SG secondary side water levels are ≥ 10% for required RCS loops.	In accordance with the Surveillance Frequency Control Program
SR 3.4.6.3	------------------------------NOTE------------------------------ Not required to be performed until 24 hours after a required pump is not in operation. --- Verify correct breaker alignment and indicated power are available to each required pump.	In accordance with the Surveillance Frequency Control Program
SR 3.4.6.4	------------------------------NOTE------------------------------ Not required to be performed until 12 hours after entering MODE 4. --- Verify required RHR loop locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.7 RCS Loops - MODE 5, Loops Filled

LCO 3.4.7 One residual heat removal (RHR) loop shall be OPERABLE and in operation, and either:

a. One additional RHR loop shall be OPERABLE or

b. The secondary side water level of at least two steam generators (SGs) shall be ≥ 10%.

---NOTES---

1. The RHR pump of the loop in operation may be removed from operation for ≤ 1 hour per 8 hour period provided:

   a. No operations are permitted that would cause introduction of coolant into the RCS with boron concentration less than required to meet the SDM of LCO 3.1.1; and

   b. Core outlet temperature is maintained at least 10°F below saturation temperature.

2. One required RHR loop may be inoperable for up to 2 hours for surveillance testing provided that the other RHR loop is OPERABLE and in operation.

3. No reactor coolant pump shall be started with one or more RCS cold leg temperatures ≤ 275°F unless the secondary side water temperature of each SG is ≤ 50°F above each of the RCS cold leg temperatures.

4. All RHR loops may be removed from operation during planned heatup to MODE 4 when at least one RCS loop is in operation.

APPLICABILITY: MODE 5 with RCS Loops Filled.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required RHR loop inoperable. AND One RHR loop OPERABLE.	A.1 Initiate action to restore a second RHR loop to OPERABLE status. OR A.2 Initiate action to restore required SGs secondary side water level to within limit.	Immediately Immediately
B. One or more required SGs with secondary side water level not within limit. AND One RHR loop OPERABLE.	B.1 Initiate action to restore a second RHR loop to OPERABLE status. OR B.2 Initiate action to restore required SGs secondary side water level to within limit.	Immediately Immediately
C. No required RHR loops OPERABLE. OR Required RHR loop not in operation.	C.1 Suspend operations that would cause introduction of coolant into the RCS with boron concentration less than required to meet SDM of LCO 3.1.1. AND C.2 Initiate action to restore one RHR loop to OPERABLE status and operation.	Immediately Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.4.7.1	Verify required RHR loop is in operation.	In accordance with the Surveillance Frequency Control Program
SR 3.4.7.2	Verify SG secondary side water level is ≥ 10% in required SGs.	In accordance with the Surveillance Frequency Control Program
SR 3.4.7.3	-------------------------------NOTE------------------------------ Not required to be performed until 24 hours after a required pump is not in operation. --- Verify correct breaker alignment and indicated power are available to each required RHR pump.	In accordance with the Surveillance Frequency Control Program
SR 3.4.7.4	Verify required RHR loop locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.8 RCS Loops - MODE 5, Loops Not Filled

LCO 3.4.8 Two residual heat removal (RHR) loops shall be OPERABLE and one RHR loop shall be in operation.

--NOTES--

1. All RHR pumps may be removed from operation for ≤ 15 minutes when switching from one loop to another provided:

   a. The core outlet temperature is maintained > 10°F below saturation temperature;

   b. No operations are permitted that would cause introduction of coolant into the RCS with boron concentration less than required to meet the SDM of LCO 3.1.1; and

   c. No draining operations to further reduce the RCS water volume are permitted.

2. One RHR loop may be inoperable for ≤ 2 hours for surveillance testing provided that the other RHR loop is OPERABLE and in operation.

APPLICABILITY: MODE 5 with RCS loops not filled.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required RHR loop inoperable.	A.1 Initiate action to restore RHR loop to OPERABLE status.	Immediately

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
B. No required RHR loop OPERABLE. <u>OR</u> Required RHR loop not in operation.	B.1	Suspend operations that would cause introduction of coolant into the RCS with boron concentration less than required to meet SDM of LCO 3.1.1.	Immediately
	<u>AND</u>		
	B.2	Initiate action to restore one RHR loop to OPERABLE status and operation.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.4.8.1	Verify required RHR loop is in operation.	In accordance with the Surveillance Frequency Control Program
SR 3.4.8.2	------------------------------NOTE----------------------------- Not required to be performed until 24 hours after a required pump is not in operation. --- Verify correct breaker alignment and indicated power are available to each required RHR pump.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.4.8.3	Verify RHR loop locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.9 Pressurizer

LCO 3.4.9 The pressurizer shall be OPERABLE with:

a. Pressurizer water level ≤ 92% and

b. Two groups of pressurizer heaters OPERABLE with the capacity of each group ≥ 125 kW and capable of being powered from an emergency power supply.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Pressurizer water level not within limit.	A.1 Be in MODE 3.	6 hours
	<u>AND</u>	
	A.2 Fully insert all rods.	6 hours
	<u>AND</u>	
	A.3 Place Rod Control System in a condition incapable of rod withdrawal.	6 hours
	<u>AND</u>	
	A.4 Be in MODE 4.	12 hours
B. One required group of pressurizer heaters inoperable.	B.1 Restore required group of pressurizer heaters to OPERABLE status.	72 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
C. One required group of pressurizer heaters not capable of being powered from an emergency power supply.	C.1	Restore emergency power supply to required group of pressurizer heaters.	14 days
D. Required Action and associated Completion Time of Condition B or C not met.	D.1	Be in MODE 3.	6 hours
	AND		
	D.2	Be in MODE 4.	12 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.4.9.1	Verify pressurizer water level is ≤ 92%.	In accordance with the Surveillance Frequency Control Program
SR 3.4.9.2	Verify capacity of each required group of pressurizer heaters is ≥ 125 kW.	In accordance with the Surveillance Frequency Control Program
SR 3.4.9.3	Verify required pressurizer heaters are capable of being powered from an emergency power supply.	In accordance with the Surveillance Frequency Control Program

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.10 Pressurizer Safety Valves

LCO 3.4.10 Three pressurizer safety valves shall be OPERABLE with lift settings ≥ 2391 psig and ≤ 2514 psig.

APPLICABILITY: MODES 1, 2, and 3,
MODE 4 with all RCS cold leg temperatures > 275°F.

--NOTE--
The lift settings are not required to be within the LCO limits during MODES 3 and 4 for the purpose of setting the pressurizer safety valves under ambient (hot) conditions. This exception is allowed for 54 hours following entry into MODE 3 provided a preliminary cold setting was made prior to heatup.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One pressurizer safety valve inoperable.	A.1 Restore valve to OPERABLE status.	15 minutes
B. Required Action and associated Completion Time not met. <u>OR</u> Two or more pressurizer safety valves inoperable.	B.1 Be in MODE 3. <u>AND</u> B.2 Be in MODE 4 with any RCS cold leg temperatures ≤ 275°F.	6 hours 24 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.4.10.1	Verify each pressurizer safety valve is OPERABLE in accordance with the INSERVICE TESTING PROGRAM. Following testing, lift settings shall be within ± 1%.	In accordance with the INSERVICE TESTING PROGRAM

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.11 Pressurizer Power Operated Relief Valves (PORVs)

LCO 3.4.11 Each PORV and associated block valve shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

--NOTE--
Separate Condition entry is allowed for each PORV and each block valve.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more PORVs inoperable and capable of being manually cycled.	A.1 Close and maintain power to associated block valve.	1 hour
B. One PORV inoperable and not capable of being manually cycled.	B.1 Close associated block valve.	1 hour
	AND	
	B.2 Remove power from associated block valve.	1 hour
C. One block valve inoperable.	-------------------NOTE------------------ Required Actions C.1 and C.2 do not apply when block valve is inoperable solely as a result of complying with Required Action B.2. ---	
	C.1 Close affected block valve.	1 hour
	AND	
	C.2 Remove power from affected block valve.	1 hour

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
D. Required Action and associated Completion Time of Condition C not met.	D.1	Place associated PORV in manual control	1 hour
	AND		
	D.2	Be in MODE 3.	6 hours
	AND		
	D.3	Be in MODE 4.	12 hours
E. Two PORVs inoperable and not capable of being manually cycled.	E.1	Restore one PORV to OPERABLE status.	30 days
F. Two block valves inoperable.	F.1	-------------NOTE---------------- Required Action F.1 does not apply when block valve is inoperable solely as a result of complying with Required Action B.2. ------------------------------------ Restore one block valve to OPERABLE status.	30 days
G. Required Action and associated Completion Time of Condition A, B, E, or F not met.	G.1	Be in MODE 3.	6 hours
	AND		
	G.2	Be in MODE 4.	12 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.4.11.1	------------------------------NOTES---------------------------- 1. Not required to be performed with block valve closed in accordance with Required Actions of this LCO. 2. Only required to be performed in MODES 1 and 2. -- Perform a complete cycle of each PORV block valve.	In accordance with the INSERVICE TESTING PROGRAM
SR 3.4.11.2	------------------------------NOTE------------------------------ Only required to be performed in MODES 1 and 2. -- Perform a complete cycle of each PORV.	In accordance with the Surveillance Frequency Control Program

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.12 Overpressure Mitigating Systems (OMS)

LCO 3.4.12 The OMS shall be OPERABLE with the high pressure safety injection flow paths to the RCS isolated and one of the following pressure relief capabilities:

a. Two power operated relief valves (PORVs) with lift settings ≤ 448 psig, or

b. The RCS depressurized and an RCS vent of ≥ 2.20 square inches.

APPLICABILITY: MODE 4 when any RCS cold leg temperature is ≤ 275°F,
MODE 5,
MODE 6 when the reactor vessel head is on.

ACTIONS

---NOTE---

LCO 3.0.4.b is not applicable when entering MODE 4.

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One or more high pressure safety injection flow paths to the RCS not isolated.	A.1	Isolate all high pressure safety injection flow paths to the RCS.	4 hours
B. One required PORV inoperable in MODE 4.	B.1	Restore required PORV to OPERABLE status.	7 days
C. One required PORV inoperable in MODE 5 or 6.	C.1	Restore required PORV to OPERABLE status.	24 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Two required PORVs inoperable. <u>OR</u> Required Action and associated Completion Time of Condition A or B not met.	D.1 Depressurize RCS and establish RCS vent of ≥ 2.20 square inches.	24 hours
E. Required Action and associated Completion Time of Condition C not met.	E.1 Depressurize RCS and establish RCS vent of ≥ 2.20 square inches. <u>OR</u> E.2 Depressurize and vent RCS through at least one open PORV and associated block valve.	24 hours 24 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.4.12.1	Verify no safety injection pump is capable of injecting into the RCS.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.4.12.2	Verify required RCS vent ≥ 2.20 square inches open.	In accordance with the Surveillance Frequency Control Program
SR 3.4.12.3	Verify PORV block valve is open for each required PORV.	In accordance with the Surveillance Frequency Control Program
SR 3.4.12.4	-------------------------------NOTE------------------------------ Not required to be performed until 12 hours after decreasing RCS cold leg temperature to ≤ 275°F. -- Perform a COT on each required PORV, excluding actuation.	 In accordance with the Surveillance Frequency Control Program
SR 3.4.12.5	Perform CHANNEL CALIBRATION for each required PORV actuation channel.	In accordance with the Surveillance Frequency Control Program

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.13 RCS Operational LEAKAGE

LCO 3.4.13 RCS operational LEAKAGE shall be limited to:

a. No pressure boundary LEAKAGE,

b. 1 gpm unidentified LEAKAGE,

c. 10 gpm identified LEAKAGE, and

d. 150 gallons per day primary to secondary LEAKAGE through any one steam generator (SG).

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. Pressure boundary LEAKAGE exists.	A.1	Isolate affected component, pipe, or vessel from the RCS by use of a closed manual valve, closed and de-activated automatic valve, blind flange, or check valve.	4 hours
B. RCS operational LEAKAGE not within limits for reasons other than pressure boundary LEAKAGE or primary to secondary LEAKAGE.	B.1	Reduce LEAKAGE to within limits.	4 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
C. Required Action and associated Completion Time not met. OR Primary to secondary LEAKAGE not within limit.	C.1	Be in MODE 3.	6 hours
	AND		
	C.2	--------------NOTE-------------- LCO 3.0.4.a is not applicable when entering MODE 4. ------------------------------------- Be in MODE 4.	12 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.4.13.1	------------------------------NOTES---------------------------- 1. Not required to be performed until 12 hours after establishment of steady state operation. 2. Not applicable to primary to secondary LEAKAGE. --- Verify RCS operational LEAKAGE is within limits by performance of RCS water inventory balance.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.4.13.2	-------------------------------NOTE------------------------------ Not required to be performed until 12 hours after establishment of steady state operation. --- Verify primary to secondary LEAKAGE is $\leq$ 150 gallons per day through any one SG.	In accordance with the Surveillance Frequency Control Program

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.14 RCS Pressure Isolation Valve (PIV) Leakage

LCO 3.4.14 Leakage from each RCS PIV shall be within limit.

AND

The Residual Heat Removal (RHR) System interlock function shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,
MODE 4, except valves in the residual heat removal (RHR) flow path when in, or during the transition to or from, the RHR mode of operation.

ACTIONS

--NOTES--

1. Separate Condition entry is allowed for each flow path.
2. Enter applicable Conditions and Required Actions for systems made inoperable by an inoperable RCS PIV.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more flow paths with leakage from one or more RCS PIVs not within limit.	--------------------NOTE------------------- Each valve used to satisfy Required Action A.1 must have been verified to meet SR 3.4.14.1 and be in the reactor coolant pressure boundary. ---	
	A.1 Isolate the high pressure portion of the affected system from the low pressure portion by use of one closed manual, deactivated automatic, or check valve.	4 hours
	AND	

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. (continued)	A.2	Restore RCS PIV to within limits.	72 hours
B. Required Action and associated Completion Time for Condition A not met.	B.1	Be in MODE 3.	6 hours
	AND		
	B.2	--------------NOTE-------------- LCO 3.0.4.a is not applicable when entering MODE 4. -------------------------------------	
		Be in MODE 4.	12 hours
C. RHR System autoclosure interlock function inoperable.	C.1	Isolate the affected penetration by use of one closed manual or deactivated automatic valve.	4 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.4.14.1	------------------------------NOTES------------------------------ 1. Not required to be performed in MODES 3 and 4. 2. Not required to be performed on the RCS PIVs located in the RHR flow path when in the shutdown cooling mode of operation. 3. RCS PIVs actuated during the performance of this Surveillance are not required to be tested more than once if a repetitive testing loop cannot be avoided. --- Verify leakage from each RCS PIV is ≤ 5.0 gpm at an RCS pressure ≥ 2215 psig and ≤ 2255 psig and, when current measured leakage is > 1 gpm, the current measured leakage has not exceeded the leakage rate determined by the previous test by an amount that reduces the margin between measured leakage rate and 5.0 gpm by 50%.	In accordance with the INSERVICE TESTING PROGRAM AND Prior to entering MODE 2 whenever the unit has been in MODE 5 for 7 days or more, if leakage testing has not been performed in the previous 9 months AND Within 24 hours following valve actuation due to automatic or manual action or flow through the valve

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.4.14.2	Verify RHR System autoclosure interlock prevents the valves from being opened with a simulated or actual RCS pressure signal ≥ 525 psig.	In accordance with the Surveillance Frequency Control Program
SR 3.4.14.3	Verify RHR System autoclosure interlock causes the valves to close automatically with a simulated or actual RCS pressure signal ≥ 525 psig.	In accordance with the Surveillance Frequency Control Program

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.15 RCS Leakage Detection Instrumentation

LCO 3.4.15 The following RCS leakage detection instrumentation shall be OPERABLE:

a. One containment sump level monitor; and

b. One containment atmosphere radioactivity monitor (gaseous or particulate.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Required containment sump monitor inoperable.	A.1 --------------NOTE-------------- Not required until 12 hours after establishment of steady state operation. ------------------------------------- Perform SR 3.4.13.1.	 Once per 24 hours
	AND	
	A.2 Restore required containment sump monitor to OPERABLE status.	30 days

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Required containment atmosphere radioactivity monitor inoperable.	B.1.1 Analyze grab samples of the containment atmosphere.	Once per 24 hours
	OR	
	B.1.2 --------------NOTE-------------- Not required until 12 hours after establishment of steady state operation. -------------------------------------	
	Perform SR 3.4.13.1.	Once per 24 hours
	AND	
	B.2 Restore required containment atmosphere radioactivity monitor to OPERABLE status.	30 days
------------- NOTE -------------- Only applicable when the containment atmosphere gaseous radiation monitor is the only OPERABLE monitor. ------------------------------------- C. Required containment sump monitor inoperable.	C.1 Analyze grab samples of the containment atmosphere.	Once per 12 hours
	AND	
	C.2 Restore required containment sump monitor to OPERABLE status.	7 days

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
D. Required Action and associated Completion Time of Condition A or B not met.	D.1	Be in MODE 3.	6 hours
	AND		
	D.2	--------------NOTE-------------- LCO 3.0.4.a is not applicable when entering MODE 4. -------------------------------------	
		Be in MODE 4.	12 hours
E. All required monitors inoperable.	E.1	Enter LCO 3.0.3.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.4.15.1	Perform CHANNEL CHECK of the required containment atmosphere radioactivity monitor.	In accordance with the Surveillance Frequency Control Program
SR 3.4.15.2	Perform COT of the required containment atmosphere radioactivity monitor.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.4.15.3	Perform CHANNEL CALIBRATION of the required containment sump monitor.	In accordance with the Surveillance Frequency Control Program
SR 3.4.15.4	Perform CHANNEL CALIBRATION of the required containment atmosphere radioactivity monitor.	In accordance with the Surveillance Frequency Control Program

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.16 RCS Specific Activity

LCO 3.4.16 RCS DOSE EQUIVALENT I-131 and DOSE EQUIVALENT XE-133 specific activity shall be within limits.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. DOSE EQUIVALENT I-131 not within limit.	--------------------NOTE------------------- LCO 3.0.4.c is applicable. --	
	A.1 Verify DOSE EQUIVALENT I-131 $\leq$ 60 μCi/gm.	Once per 4 hours
	AND	
	A.2 Restore DOSE EQUIVALENT I-131 to within limit.	48 hours
B. DOSE EQUIVALENT XE-133 not within limit.	--------------------NOTE------------------- LCO 3.0.4.c is applicable. --	
	B.1 Restore DOSE EQUIVALENT XE-133 to within limit.	48 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Required Action and associated Completion Time of Condition A or B not met. OR DOSE EQUIVALENT I-131 > 60 μCi/gm.	C.1 Be in MODE 3. AND C.2 Be in MODE 5.	6 hours 36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.4.16.1	-------------------------------NOTE------------------------------ Only required to be performed in MODE 1. --- Verify reactor coolant DOSE EQUIVALENT XE-133 specific activity ≤ 447.7 μCi/gm.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.4.16.2	-------------------------------NOTE------------------------------ Only required to be performed in MODE 1. --- Verify reactor coolant DOSE EQUIVALENT I-131 specific activity ≤ 0.25 μCi/gm.	In accordance with the Surveillance Frequency Control Program <u>AND</u> Between 2 and 6 hours after a THERMAL POWER change of ≥ 15% RTP within a 1 hour period

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.17 Steam Generator (SG) Tube Integrity

LCO 3.4.17 SG tube integrity shall be maintained.

AND

All SG tubes satisfying the tube plugging criteria shall be plugged in accordance with the Steam Generator Program.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

---NOTE---
Separate Condition entry is allowed for each SG tube.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more SG tubes satisfying the tube plugging criteria and not plugged in accordance with the Steam Generator Program.	A.1 Verify tube integrity of the affected tube(s) is maintained until the next refueling outage or SG tube inspection.	7 days
	AND	
	A.2 Plug the affected tube(s) in accordance with the Steam Generator Program.	Prior to entering MODE 4 following the next refueling outage or SG tube inspection
B. Required Action and associated Completion Time of Condition A not met.	B.1 Be in MODE 3.	6 hours
OR	AND	
SG tube integrity not maintained.	B.2 Be in MODE 5.	36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.4.17.1	Verify SG tube integrity in accordance with the Steam Generator Program.	In accordance with the Steam Generator Program
SR 3.4.17.2	Verify that each inspected SG tube that satisfies the tube plugging criteria is plugged in accordance with the Steam Generator Program.	Prior to entering MODE 4 following a SG tube inspection

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

3.5.1 Accumulators

LCO 3.5.1 Three ECCS accumulators shall be OPERABLE.

APPLICABILITY: MODES 1 and 2,
MODE 3 with RCS pressure > 1000 psig.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One accumulator inoperable due to boron concentration not within limits.	A.1 Restore boron concentration to within limits.	72 hours
B. One accumulator inoperable for reasons other than Condition A.	B.1 Restore accumulator to OPERABLE status.	24 hours
C. Required Action and associated Completion Time of Condition A or B not met.	C.1 Be in MODE 3. <u>AND</u> C.2 Reduce RCS pressure to ≤ 1000 psig.	6 hours 12 hours
D. Two or more accumulators inoperable.	D.1 Enter LCO 3.0.3.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.5.1.1	Verify each accumulator isolation valve is fully open.	In accordance with the Surveillance Frequency Control Program
SR 3.5.1.2	Verify borated water volume in each accumulator is ≥ 6520 gallons and ≤ 6820 gallons.	In accordance with the Surveillance Frequency Control Program
SR 3.5.1.3	Verify nitrogen cover pressure in each accumulator is ≥ 600 psig and ≤ 675 psig.	In accordance with the Surveillance Frequency Control Program
SR 3.5.1.4	Verify boron concentration in each accumulator is ≥ 2300 ppm and ≤ 2600 ppm.	In accordance with the Surveillance Frequency Control Program <u>AND</u>

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.5.1.4 (continued)		--------NOTE-------- Only required to be performed for affected accumulators ------------------------ Once within 6 hours after each solution volume increase of ≥ 1% of tank volume that is not the result of addition from the refueling water storage tank
SR 3.5.1.5	Verify power is removed from each accumulator isolation valve operator.	In accordance with the Surveillance Frequency Control Program

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

3.5.2 ECCS - Operating

LCO 3.5.2 The following ECCS subsystems shall be OPERABLE.

a. Three high head safety injection (HHSI) subsystems, and

b. Two residual heat removal (RHR) subsystems.

---NOTE---
In MODE 3, HHSI flow paths to the Reactor Coolant System (RCS) may be isolated to support transition into or from Applicability of LCO 3.4.12, "Overpressure Mitigating System (OMS)," when T_{avg} < 380°F.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required HHSI subsystems inoperable.	A.1 Restore HHSI subsystem(s) to OPERABLE status.	72 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program
B. One RHR pump inoperable.	B.1 Restore RHR pump to OPERABLE status.	7 days <u>OR</u> In accordance with the Risk Informed Completion Time Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. One or more RHR subsystems inoperable for reasons other than Condition B.	C.1 Restore RHR subsystem(s) to OPERABLE status.	72 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program
D. ------------NOTE------------ Not applicable when a dual unit shutdown is required. --------------------------------- Required Action and associated Completion Time of Condition A, B, or C not met.	D.1 Be in MODE 3. <u>AND</u> D.2 Be in MODE 4	6 hours 12 hours
E. ------------NOTE------------ Only applicable when a dual unit shutdown is required. --------------------------------- Required Action and associated Completion Time of Condition A, B, or C not met.	E.1 Be in MODE 3. <u>AND</u> E.2 Be in MODE 4.	12 hours 18 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. Less than 100% of the ECCS flow equivalent to a single OPERABLE RHR subsystem available. <u>OR</u> Less than 100% of the ECCS flow equivalent to two OPERABLE HHSI subsystems available.	F.1 Enter LCO 3.0.3.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.5.2.1	--------------------------------NOTE--------------------------- Power may be restored to the valves for ≤ 1 hour for surveillance or maintenance when continuous valve position indication is unavailable in the control room. -- Verify the following valves are in the listed position with power to the valve operator removed. <u>Number</u> / <u>Position</u> / <u>Function</u> 864A and B / Open / Supply from RWST to ECCS 862A and B / Open / RWST Supply to RHR pumps 863A and B / Closed / RHR Recirculation 866A and B / Closed / HHSI to Hot Legs 878A and B / Open / HHSI Header Crosstie HCV-758 / Open / RHR HX Outlet	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

	SURVEILLANCE	FREQUENCY
SR 3.5.2.2	--------------------------------NOTE--------------------------- Not required to be met for system vent flow paths opened under administrative control. --- Verify each ECCS manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.3	Verify ECCS locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.4	Verify each ECCS pump's developed head at the test flow point is greater than or equal to the required developed head.	In accordance with the INSERVICE TESTING PROGRAM
SR 3.5.2.5	Verify each ECCS automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.6	Verify each ECCS pump starts automatically on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.5.2.7	Verify, for each ECCS throttle valve listed below, each position stop is in the correct position. <u>Valve Number</u> HCV-*-758 MOV-*-872	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.8	Verify, by visual inspection, each ECCS containment sump suction inlet is not restricted by debris and the suction components show no evidence of structural distress or abnormal corrosion.	In accordance with the Surveillance Frequency Control Program

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

3.5.3 ECCS - Shutdown

LCO 3.5.3 One ECCS train shall be OPERABLE.

---NOTE---
An RHR train may be considered OPERABLE during alignment and operation for decay heat removal if capable of being manually realigned to the ECCS mode of operation.

APPLICABILITY: MODE 4.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. Required ECCS train inoperable.	A.1	-------------- NOTE ------------- LCO 3.0.4.a is not applicable when entering MODE 4. ------------------------------------- Initiate action to restore required ECCS train to OPERABLE status.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.5.3.1	The following SRs are applicable for all equipment required to be OPERABLE: SR 3.5.2.3 SR 3.5.2.7 SR 3.5.2.4 SR 3.5.2.8	In accordance with applicable SRs

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

3.5.4 Refueling Water Storage Tank (RWST)

LCO 3.5.4 The RWST shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. RWST boron concentration not within limits. <u>OR</u> RWST borated water temperature not within limits.	A.1 Restore RWST to OPERABLE status.	8 hours
B. RWST inoperable for reasons other than Condition A.	B.1 Restore RWST to OPERABLE status.	1 hour
C. Required Action and associated Completion Time not met.	C.1 Be in MODE 3. <u>AND</u> C.2 --------------NOTE-------------- LCO 3.0.4.a is not applicable when entering MODE 4. ------------------------------------- Be in MODE 4.	6 hours 12 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.5.4.1	------------------------------NOTE------------------------------ Not required to be performed until 24 hours after ambient air temperature is < 39°F or > 100°F. -- Verify RWST borated water temperature is ≥ 39°F and ≤ 100°F.	In accordance with the Surveillance Frequency Control Program
SR 3.5.4.2	Verify RWST borated water volume is ≥ 320,000 gallons.	In accordance with the Surveillance Frequency Control Program
SR 3.5.4.3	Verify RWST boron concentration is ≥ 2400 ppm and ≤ 2600 ppm.	In accordance with the Surveillance Frequency Control Program

3.6 CONTAINMENT SYSTEMS

3.6.1 Containment

LCO 3.6.1 Containment shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Containment inoperable.	A.1 Restore containment to OPERABLE status.	1 hour
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. AND B.2 Be in MODE 5.	6 hours 36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.1.1	Perform required visual examinations and leakage rate testing except for containment air lock testing, in accordance with the Containment Leakage Rate Testing Program.	In accordance with the Containment Leakage Rate Testing Program
SR 3.6.1.2	Verify containment structural integrity in accordance with the Pre-Stressed Concrete Containment Tendon Surveillance Program.	In accordance with the Pre-Stressed Concrete Containment Tendon Surveillance Program

3.6 CONTAINMENT SYSTEMS

3.6.2 Containment Air Locks

LCO 3.6.2 Two containment air locks shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

---NOTES---

1. Entry and exit is permissible to perform repairs on the affected air lock components.

2. Separate Condition entry is allowed for each air lock.

3. Enter applicable Conditions and Required Actions of LCO 3.6.1, "Containment," when air lock leakage results in exceeding the overall containment leakage rate.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more containment air locks with one containment air lock door inoperable.	--------------------NOTES----------------- 1. 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. 2. Entry and exit is permissible for 7 days under administrative controls if both air locks are inoperable. --- A.1 Verify the OPERABLE door is closed in the affected air lock. <u>AND</u>	 1 hour

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.2 Lock the OPERABLE door closed in the affected air lock.	24 hours
	AND	
	A.3 --------------NOTE-------------- Air lock doors in high radiation areas may be verified locked closed by administrative means. ------------------------------------- Verify the OPERABLE door is locked closed in the affected air lock.	Once per 31 days
B. One or more containment air locks with containment air lock interlock mechanism inoperable.	-------------------NOTES------------------ 1. Required Actions B.1, B.2, and B.3 are not applicable if both doors in the same air lock are inoperable and Condition C is entered. 2. Entry and exit of containment is permissible under the control of a dedicated individual. ---	
	B.1 Verify an OPERABLE door is closed in the affected air lock.	1 hour
	AND	

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
B. (continued)	B.2	Lock an OPERABLE door closed in the affected air lock.	24 hours
	AND		
	B.3	--------------NOTE-------------- Air lock doors in high radiation areas may be verified locked closed by administrative means. -------------------------------------	
		Verify an OPERABLE door is locked closed in the affected air lock.	Once per 31 days
C. One or more containment air locks inoperable for reasons other than Condition A or B.	C.1	Initiate action to evaluate overall containment leakage rate per LCO 3.6.1.	Immediately
	AND		
	C.2	Verify a door is closed in the affected air lock.	1 hour
	AND		
	C.3	Restore air lock to OPERABLE status.	24 hours OR In accordance with the Risk Informed Completion Time Program
D. Required Action and associated Completion Time not met.	D.1	Be in MODE 3.	6 hours
	AND		
	D.2	Be in MODE 5.	36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.2.1	-----------------------------NOTES---------------------------- 1. An inoperable air lock door does not invalidate the previous successful performance of the overall air lock leakage test. 2. Results shall be evaluated against acceptance criteria applicable to SR 3.6.1.1. --- Perform required air lock leakage rate testing in accordance with the Containment Leakage Rate Testing Program.	In accordance with the Containment Leakage Rate Testing Program
SR 3.6.2.2	Verify only one door in the air lock can be opened at a time.	In accordance with the Surveillance Frequency Control Program

3.6 CONTAINMENT SYSTEMS

3.6.3 Containment Isolation Valves

LCO 3.6.3 Each containment isolation valve (CIV) shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

---NOTES---

1. Penetration flow path(s) except for purge supply and exhaust valve flow paths may be unisolated intermittently under administrative controls.

2. Separate Condition entry is allowed for each penetration flow path.

3. Enter applicable Conditions and Required Actions for systems made inoperable by containment isolation valves.

4. Enter applicable Conditions and Required Actions of LCO 3.6.1, "Containment," when isolation valve leakage results in exceeding the overall containment leakage rate acceptance criteria.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. ------------NOTE------------ Only applicable to penetration flow paths with two containment isolation valves. -------------------------------- One or more penetration flow paths with one containment isolation valve inoperable for reasons other than Condition D.	A.1 Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured. <u>AND</u>	4 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. (continued)	A.2	-------------NOTES------------- 1. Isolation devices in high radiation areas may be verified by use of administrative means. 2. Isolation devices that are locked, sealed, or otherwise secured may be verified by use of administrative means. ------------------------------------- Verify the affected penetration flow path is isolated.	 Once per 31 days following isolation for isolation devices outside containment <u>AND</u> Prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days for isolation devices inside containment

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
B. ------------NOTE------------ Only applicable to penetration flow paths with two containment isolation valves. -------------------------------- One or more penetration flow paths with two containment isolation valves inoperable for reasons other than Condition D.	B.1	Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange.	1 hour
C. ------------NOTE------------ Only applicable to penetration flow paths with only one containment isolation valve and a closed system. -------------------------------- One or more penetration flow paths with one containment isolation valve inoperable.	C.1	Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange.	72 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program
	<u>AND</u>		
	C.2	--------------NOTES------------- 1. Isolation devices in high radiation areas may be verified by use of administrative means. 2. Isolation devices that are locked, sealed, or otherwise secured may be verified by use of administrative means. ------------------------------------- Verify the affected penetration flow path is isolated.	Once per 31 days following isolation

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
D. One or more purge valve leakage not within limit.	D.1	Restore leakage within limit.	72 hours
E. Required Action and associated Completion Time not met.	E.1	Be in MODE 3.	6 hours
	AND		
	E.2	Be in MODE 5.	36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.3.1	Verify each purge supply and exhaust valve is sealed closed and deactivated or the associated penetration(s) isolated by flange.	In accordance with the Surveillance Frequency Control Program
SR 3.6.3.2	-------------------------------NOTE------------------------------ Valves and blind flanges in high radiation areas may be verified by use of administrative controls. --- Verify each containment isolation manual valve and blind flange that is located outside containment and not locked, sealed, or otherwise secured and required to be closed during accident conditions is closed, except for containment isolation valves that are open under administrative controls.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.6.3.3	------------------------------NOTE------------------------------ Valves and blind flanges in high radiation areas may be verified by use of administrative means. -- Verify each containment isolation manual valve and blind flange that is located inside containment and not locked, sealed, or otherwise secured and required to be closed during accident conditions is closed, except for containment isolation valves that are open under administrative controls.	Prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days
SR 3.6.3.4	Verify the isolation time of each automatic power operated containment isolation valve is within limits.	In accordance with the INSERVICE TESTING PROGRAM
SR 3.6.3.5	------------------------------NOTE------------------------------ Not required to be met for valves in penetrations isolated by blind flanges. -- Perform leakage rate testing for containment purge valves with resilient seals.	In accordance with the Surveillance Frequency Control Program
SR 3.6.3.6	Verify each automatic containment isolation valve that is not locked, sealed or otherwise secured in position, actuates to the isolation position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program

3.6 CONTAINMENT SYSTEMS

3.6.4 Containment Pressure

LCO 3.6.4 Containment pressure shall be ≥ -2 psig and ≤ +1 psig.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Containment pressure not within limits.	A.1 Restore containment pressure to within limits.	1 hour
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. AND B.2 Be in MODE 5.	6 hours 36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.1	Verify containment pressure is within limits.	In accordance with the Surveillance Frequency Control Program

3.6 CONTAINMENT SYSTEMS

3.6.5 Containment Air Temperature

LCO 3.6.5 Containment average air temperature shall be ≤ 125°F and shall not exceed 120°F by more than 336 equivalent hours during a calendar year.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Containment average air temperature not within limit.	A.1 Restore containment average air temperature to within limit.	8 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. AND B.2 Be in MODE 5.	6 hours 36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.5.1	Verify containment average air temperature is within limit.	In accordance with the Surveillance Frequency Control Program

3.6 CONTAINMENT SYSTEMS

3.6.6 Containment Spray and Cooling Systems

LCO 3.6.6 Two containment spray trains and three emergency containment cooling units shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One containment spray train inoperable.	A.1	Restore containment spray train to OPERABLE status.	72 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program
B. Required Action and associated Completion Time of Condition A not met.	B.1	Be in MODE 3.	6 hours
	<u>AND</u>		
	B.2	--------------NOTE-------------- LCO 3.0.4.a is not applicable when entering MODE 4. ------------------------------------- Be in MODE 4.	54 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. One emergency containment cooling unit inoperable.	C.1 Restore emergency containment cooling unit to OPERABLE status.	72 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program
D. Required Action and associated Completion Time of Condition C not met.	D.1 Be in MODE 3. <u>AND</u> D.2 -------------- NOTE ------------- LCO 3.0.4.a is not applicable when entering MODE 4. ------------------------------------- Be in MODE 4.	6 hours 12 hours
E. Two containment spray trains inoperable. <u>OR</u> Two or more emergency containment cooling units inoperable.	E.1 Enter LCO 3.0.3.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.6.1	--------------------------------NOTE--------------------------- Not required to be met for system vent flow paths opened under administrative control. --- Verify each containment spray manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in position is in the correct position.	In accordance with the Surveillance Frequency Control Program
SR 3.6.6.2	Operate each emergency containment cooling unit fan unit for ≥ 15 minutes.	In accordance with the Surveillance Frequency Control Program
SR 3.6.6.3	Verify each emergency containment cooling unit cooling water flow rate is ≥ 2000 gpm.	In accordance with the Surveillance Frequency Control Program
SR 3.6.6.4	Verify containment spray locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program
SR 3.6.6.5	Verify each containment spray pump's developed head at the flow test point is greater than or equal to the required developed head.	In accordance with the INSERVICE TESTING PROGRAM
SR 3.6.6.6	Verify each automatic containment spray valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.6.6.7	Verify each containment spray pump starts automatically on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.6.6.8	Verify each emergency containment cooling unit starts automatically on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.6.6.9	Verify each spray nozzle is unobstructed.	In accordance with the Surveillance Frequency Control Program

3.6 CONTAINMENT SYSTEMS

3.6.7 Recirculation pH Control System

LCO 3.6.7 The Recirculation pH Control System shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. Recirculation pH Control System inoperable.	A.1	Restore Recirculation pH Control System to OPERABLE status.	72 hours
B. Required Action and associated Completion Time not met.	B.1	Be in MODE 3.	6 hours
	AND		
	B.2	--------------NOTE-------------- LCO 3.0.4.a is not applicable when entering MODE 4. -------------------------------------	
		Be in MODE 4.	54 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.7.1	Verify the buffering agent baskets are in place and intact.	In accordance with the Surveillance Frequency Control Program
SR 3.6.7.2	Verify the buffering agent baskets collectively contain > 7500 pound (154 cubic feet) of sodium tetraborate decahydrate, or equivalent.	In accordance with the Surveillance Frequency Control Program

3.7 PLANT SYSTEMS

3.7.1 Main Steam Safety Valves (MSSVs)

LCO 3.7.1 Four MSSVs per steam generator shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

--NOTE--

Separate Condition entry is allowed for each MSSV.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more steam generators with one or more MSSV inoperable in MODE 1 with the moderator temperature coefficient (MTC) zero or negative. <u>OR</u> One or more steam generators with one or more MSSV inoperable in MODE 2 or 3.	A.1 Reduce THERMAL POWER to less than or equal to the Maximum Allowable % RTP specified in Table 3.7.1-1 for the number of OPERABLE MSSVs.	4 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
B. One or more steam generators with one or more MSSV inoperable in MODE 1 with a positive MTC.	B.1	Reduce THERMAL POWER to less than or equal to the Maximum Allowable % RTP specified in Table 3.7.1-1 for the number of OPERABLE MSSVs.	4 hours
	AND		
	B.2	Reduce the Power Range Neutron Flux - High reactor trip setpoint to less than or equal to the Maximum Allowable % RTP specified in Table 3.7.1-1 for the number of OPERABLE MSSVs.	36 hours
C. Required Action and associated Completion Time not met. OR One or more steam generators with all MSSVs inoperable.	C.1	Be in MODE 3.	6 hours
	AND		
	C.2	Be in MODE 4.	18 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.1.1	------------------------------NOTE------------------------------ Only required to be performed in MODES 1 and 2. --- Verify each required MSSV lift setpoint per Table 3.7.1-2 in accordance with the INSERVICE TESTING PROGRAM. Following testing, lift setting shall be within ±1%.	In accordance with the INSERVICE TESTING PROGRAM

Table 3.7.1-1 (page 1 of 1)
OPERABLE Main Steam Safety Valves versus
Maximum Allowable Power

NUMBER OF OPERABLE MSSVs PER STEAM GENERATOR	MAXIMUM ALLOWABLE POWER (% RTP)
3	44
2	27
1	10

Table 3.7.1-2 (page 1 of 1)
Main Steam Safety Valve Lift Settings

VALVE NUMBER			LIFT SETTING (psig ± 3%)
STEAM GENERATOR			
A	B	C	
RV1400	RV1405	RV1410	1085
RV1401	RV1406	RV1411	1100
RV1402	RV1407	RV1412	1105
RV1403	RV1408	RV1413	1105

3.7 PLANT SYSTEMS

3.7.2 Main Steam Isolation Valves (MSIVs)

LCO 3.7.2 Three MSIVs shall be OPERABLE.

APPLICABILITY: MODE 1,
MODES 2 and 3 except when all MSIVs are closed and de-activated.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One MSIV inoperable in MODE 1.	A.1 Restore MSIV to OPERABLE status.	24 hours
B. Required Action and associated Completion Time of Condition A not met.	B.1 Be in MODE 2.	6 hours
C. ------------NOTE------------ Separate Condition entry is allowed for each MSIV. -------------------------------- One or more MSIVs inoperable in MODE 2 or 3.	C.1 Close MSIV. <u>AND</u> C.2 Verify MSIV is closed.	8 hours Once per 7 days
D. Required Action and associated Completion Time of Condition C not met.	D.1 Be in MODE 3. <u>AND</u> D.2 Be in MODE 4.	6 hours 12 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.2.1	-------------------------------NOTE------------------------------ Only required to be performed in MODES 1 and 2. --- Verify the isolation time of each MSIV is within limits.	In accordance with the INSERVICE TESTING PROGRAM
SR 3.7.2.2	-------------------------------NOTE------------------------------ Only required to be performed in MODES 1 and 2. --- Verify each MSIV actuates to the isolation position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program

3.7 PLANT SYSTEMS

3.7.3 Feedwater Isolation Valves (FIVs) and Feedwater Control Valves (FCVs) and Associated Bypass Valves

LCO 3.7.3 Three FIVs, three FCVs, and associated bypass valves shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3 except when FIV, FCV, or associated bypass valve is closed and de-activated or isolated by a closed manual valve.

ACTIONS

---NOTE---

Separate Condition entry is allowed for each valve.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more FIVs inoperable.	A.1 Close or isolate FIV. AND A.2 Verify FIV is closed or isolated.	72 hours Once per 7 days
B. One or more FCVs inoperable.	B.1 Close or isolate FCV. AND B.2 Verify FCV is closed or isolated.	72 hours Once per 7 days
C. One or more bypass valves inoperable.	C.1 Close or isolate bypass valve. AND C.2 Verify bypass valve is closed or isolated.	72 hours Once per 7 days

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
D. Two valves in the same flow path inoperable.	D.1	Isolate affected flow path.	8 hours
E. Required Action and associated Completion Time not met.	E.1	Be in MODE 3.	6 hours
	<u>AND</u>		
	E.2	Be in MODE 4.	12 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.3.1	-----------------------------NOTE------------------------------ Only required to be performed in MODES 1 and 2. --- Verify the isolation time of each FIV, FCV, and associated bypass valve is within limits.	In accordance with the INSERVICE TESTING PROGRAM
SR 3.7.3.2	-----------------------------NOTE------------------------------ Only required to be performed in MODES 1 and 2. --- Verify each FIV, FCV, and associated bypass valves actuates to the isolation position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program

3.7 PLANT SYSTEMS

3.7.4 Secondary Specific Activity

LCO 3.7.4 The specific activity of the secondary coolant shall be ≤ 0.10 μCi/gm DOSE EQUIVALENT I-131.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Specific activity not within limit.	A.1 Be in MODE 3. AND A.2 Be in MODE 5.	6 hours 36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.4.1	Verify the specific activity of the secondary coolant is ≤ 0.10 μCI/gm DOSE EQUIVELENT I-131.	In accordance with the Surveillance Frequency Program

3.7 PLANT SYSTEMS

3.7.5 Auxiliary Feedwater (AFW) System

LCO 3.7.5 Two AFW trains and three steam generator steam supplies shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

---NOTE---
LCO 3.0.4.b is not applicable when entering MODE 1.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One steam generator steam supply inoperable.	A.1 --------------NOTE-------------- Required Action A.1 is not applicable if two or more steam generator steam supplies are inoperable or one or more AFW trains are inoperable. ------------------------------------	
	Verify each OPERABLE steam generator steam supply is aligned to an OPERABLE AFW train.	4 hours
	<u>AND</u>	
	A.2 Restore steam generator steam supply to OPERABLE status.	7 days

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. One AFW train inoperable.	B.1 Restore AFW train to OPERABLE status.	72 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program
C. Two AFW trains inoperable.	C.1 Restore one AFW train to OPERABLE status.	2 hours
D. ------------NOTE------------ Not applicable when a dual unit shutdown is required. --------------------------------- Required Action and associated Completion Time of Condition A, B, or C not met.	D.1 Be in MODE 3. <u>AND</u> D.2 Be in MODE 4.	6 hours 12 hours
E. ------------NOTE------------ Only applicable when a dual unit shutdown is required. --------------------------------- Required Action and associated Completion Time of Condition A, B, or C not met.	E.1 Be in MODE 3. <u>AND</u> E.2 Be in MODE 4.	12 hours 18 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
F. ------------NOTE------------ Not applicable when both standby feedwater pumps are capable of providing makeup flow to the steam generators. --------------------------------- Two AFW trains inoperable.	F.1	--------------NOTE-------------- LCO 3.0.3 and all other LCO Required Actions requiring MODE changes are suspended until one AFW train is restored to OPERABLE status. ------------------------------------- Initiate action to restore one AFW train to OPERABLE status.	 Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.5.1	Verify each AFW manual and power operated valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position.	In accordance with the Surveillance Frequency Control Program
SR 3.7.5.2	------------------------------NOTE----------------------------- Only required to be performed in MODE 1. --- Verify each AFW pump operates for ≥ 15 minutes and develops a flow of ≥ 373 gpm to the entrance of the steam generators.	 In accordance with the Surveillance Frequency Control Program
SR 3.7.5.3	Verify each AFW automatic valve that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.7.5.4	------------------------------NOTE------------------------------ Only required to be performed in MODE 1. -- Verify each AFW pump starts automatically on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.7.5.5	Verify proper alignment of the required AFW flow paths by verifying flow from the condensate storage tank to each steam generator.	Prior to entering MODE 1 whenever unit has been in MODE 5, MODE 6, or defueled for a cumulative period of > 30 days
SR 3.7.5.6	------------------------------NOTE------------------------------ Only required to be performed in MODE 1. -- Verify the AFW pump discharge valves, steam supply valves, and turbine valves operate as required to deliver the required flow during performance of SR 3.7.5.2.	In accordance with the Surveillance Frequency Control Program

3.7 PLANT SYSTEMS

3.7.6 Condensate Storage Tank (CST)

LCO 3.7.6 The CST System shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. CST System inoperable.	A.1 Verify by administrative means availability of backup water supply. AND A.2 Restore CST System to OPERABLE status.	4 hours AND Once per 12 hours thereafter 7 days
B. ------------NOTE------------ Not applicable when a dual unit shutdown is required. -------------------------------- Required Action and associated Completion Time not met.	B.1 Be in MODE 3. AND B.2 Be in MODE 4.	6 hours 12 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. ------------NOTE------------ Only applicable when a dual unit shutdown is required. --------------------------------- Required Action and associated Completion Time of Condition A not met.	C.1 Be in MODE 3. <u>AND</u> C.2 Be in MODE 4.	12 hours 18 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.6.1	------------------------------NOTE------------------------------ Only required to be met when the opposite unit is in MODE 1, 2, or 3. --- Verify the CST level is ≥ 420,000 gal.	In accordance with the Surveillance Frequency Control Program
SR 3.7.6.2	------------------------------NOTE------------------------------ Only required to be met when the opposite unit is not in MODE 1, 2, or 3. --- Verify the CST level is ≥ 210,000 gal.	In accordance with the Surveillance Frequency Control Program

3.7 PLANT SYSTEMS

3.7.7 Component Cooling Water (CCW) System

LCO 3.7.7 Two CCW trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One CCW train inoperable.	A.1	--------------NOTE--------------- Enter applicable Conditions and Required Actions of LCO 3.4.6, "RCS Loops – MODE 4," for residual heat removal loops made inoperable by CCW. -------------------------------------	
		Restore CCW train to OPERABLE status.	72 hours OR In accordance with the Risk Informed Completion Time Program
B. Required Action and associated Completion Time of Condition A not met.	B.1	Be in MODE 3.	6 hours
	AND		
	B.2	--------------NOTE-------------- LCO 3.0.4.a is not applicable when entering MODE 4. -------------------------------------	
		Be in MODE 4.	12 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Two CCW trains inoperable.	C.1 Enter LCO 3.0.3.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.7.1	------------------------------NOTE------------------------------ Isolation of CCW flow to individual components does not render the CCW System inoperable. --- Verify each CCW manual, power operated, and automatic valve in the flow path servicing safety related equipment, that is not locked, sealed, or otherwise secured in position, is in the correct position.	In accordance with the Surveillance Frequency Control Program
SR 3.7.7.2	Verify each CCW automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.7.7.3	Verify each CCW pump starts automatically on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.7.7.4	Verify two CCW heat exchangers and one CCW pump are capable of removing design basis heat loads.	In accordance with the Surveillance Frequency Control Program
SR 3.7.7.5	-----------------------------NOTE------------------------------- Not required to be performed until 72 hours after reaching Reactor Coolant System T_{avg} of 547°F but prior to MODE 2. --- Verify the CCW heat exchanger performance curves by performance test.	In accordance with the Surveillance Frequency Control Program

3.7 PLANT SYSTEMS

3.7.8 Intake Cooling Water (ICW) System

LCO 3.7.8 Two ICW trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One ICW train inoperable.	A.1	--------------NOTE--------------- Enter applicable Conditions and Required Actions of LCO 3.4.6, "RCS Loops – MODE 4," for residual heat removal loops made inoperable by ICW. -------------------------------------	
		Restore ICW train to OPERABLE status.	72 hours OR In accordance with the Risk Informed Completion Time Program
B. Required Action and associated Completion Time not met.	B.1	Be in MODE 3.	6 hours
	AND		
	B.2	--------------NOTE-------------- LCO 3.0.4.a is not applicable when entering MODE 4. -------------------------------------	
		Be in MODE 4.	12 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.8.1	-------------------------------NOTE------------------------------ Isolation of ICW flow to individual components does not render the ICW inoperable. --- Verify each ICW manual, power operated, and automatic valve in the flow path servicing safety related equipment, that is not locked, sealed, or otherwise secured in position, is in the correct position.	In accordance with the Surveillance Frequency Control Program
SR 3.7.8.2	Verify each ICW automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.7.8.3	Verify each ICW pump starts automatically on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program

3.7 PLANT SYSTEMS

3.7.9 Ultimate Heat Sink (UHS)

LCO 3.7.9 The UHS shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. ------------NOTE------------ Not applicable when a dual unit shutdown is required. -------------------------------- UHS inoperable.	A.1 Be in MODE 3. <u>AND</u> A.2 --------------NOTE-------------- LCO 3.0.4.a is not applicable when entering MODE 4. ------------------------------------ Be in MODE 4.	6 hours 12 hours
B. -----------NOTE------------- Only applicable when a dual unit shutdown is required. -------------------------------- UHS inoperable.	B.1 Be in MODE 3. <u>AND</u> B.2 ---------------NOTE-------------- LCO 3.0.4.a is not applicable when entering MODE 4. ------------------------------------ Be in MODE 4.	12 hours 18 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.9.1	Verify average water temperature of UHS is ≤ 104°F.	1 hour when UHS temperature is > 100°F <u>AND</u> In accordance with the Surveillance Frequency Control Program

3.7 PLANT SYSTEMS

3.7.10 Control Room Emergency Ventilation System (CREVS)

LCO 3.7.10 Two CREVS trains shall be OPERABLE.

AND

Three control room air handling units (AHUs) shall be OPERABLE.

---NOTE---
The control room envelope (CRE) boundary may be opened intermittently under administrative control.

APPLICABILITY: MODES 1, 2, 3, 4, 5, and 6,
During movement of irradiated fuel assemblies.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One control room AHU inoperable.	A.1	Restore control room AHU to OPERABLE status.	7 days
B. One CREVS train inoperable for reasons other than Condition C.	B.1	Restore CREVS train to OPERABLE status.	7 days
C. One or more CREVS trains inoperable due to inoperable CRE boundary in MODE 1, 2, 3, or 4.	C.1	Initiate action to implement mitigating actions.	Immediately
	AND		
	C.2	Verify mitigating actions ensure CRE occupant exposures to radiological, chemical, and smoke hazards will not exceed limits.	24 hours
	AND		

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
C. (continued)	C.3	Restore CRE boundary to OPERABLE status.	90 days
D. ------------NOTE------------ Not applicable when a dual unit shutdown is required. -------------------------------- Required Action and associated Completion Time of Condition A, B, or C not met in MODE 1, 2, 3, or 4.	D.1 <u>AND</u> D.2	Be in MODE 3. --------------NOTE-------------- LCO 3.0.4.a is not applicable when entering MODE 4. ------------------------------------- Be in MODE 4.	6 hours 12 hours
E. ----------NOTE------------- Only applicable when a dual unit shutdown is required. ------------------------------- Required Action and associated Completion Time of Condition A, B, or C not met in MODE 1, 2, 3, or 4.	E.1 <u>AND</u> E.2.	Be in MODE 3. --------------NOTE-------------- LCO 3.0.4.a is not applicable when entering MODE 4. ------------------------------------- Be in MODE 4.	12 hours 18 hours
F. Required Action and associated Completion Time of Condition A or B not met in MODE 5 or 6, or during movement of irradiated fuel assemblies.	F.1.1 <u>AND</u> F.1.2 <u>OR</u> F.2	Place OPERABLE CREVS train in recirculation mode. Place two OPERABLE control room AHUs in service. Suspend movement of irradiated fuel assemblies.	Immediately Immediately Immediately

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
G. Two CREVS trains inoperable due to normal outside air intake isolated.	G.1	Place one CREVS train in recirculation mode.	Immediately
H. Two CREVS trains inoperable in MODE 1, 2, 3, or 4 for reasons other than Condition C or G.	H.1	Place compensatory filtration unit in service.	24 hours
----------------NOTE------------- Not applicable when a dual unit shutdown is required. -------------------------------------	I.1	Be in MODE 3.	6 hours
I. Two or more control room AHUs inoperable in MODE 1, 2, 3, or 4.	<u>AND</u>		
<u>OR</u>	I.2	Be in MODE 5.	36 hours
Required Action and associated Completion Time of Condition G or H not met in MODE 1, 2, 3, or 4.			

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
----------------NOTE------------- Only applicable when a dual unit shutdown is required. ------------------------------------ J. Two or more control room AHUs inoperable in MODE 1, 2, 3, or 4. OR Required Action and associated Completion Time of Condition G or H not met in MODE 1, 2, 3, or 4.	J.1 AND J.2	Be in MODE 3. Be in MODE 5.	12 hours 42 hours
K. Two or more control room AHUs inoperable in MODE 5 or 6, or during movement of irradiated fuel assemblies. OR One or more CREVS trains inoperable due to an inoperable CRE boundary in MODE 5 or 6, or during movement of irradiated fuel assemblies.	K.1	Suspend movement of irradiated fuel assemblies.	Immediately

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
L. Two CREVS trains inoperable in MODE 5 or 6, or during movement of irradiated fuel assemblies, for reasons other than Condition K. OR Required Action and associated Completion Time of Condition G not met in MODE 5 or 6, or during movement of irradiated fuel assemblies.	L.1 Place compensatory filtration unit in service. OR L.2 Suspend movement of irradiated fuel assemblies.	Immediately Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.10.1	Operate each CREVS train for ≥ 15 continuous minutes.	In accordance with the Surveillance Frequency Control Program
SR 3.7.10.2	Perform required CREVS filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.7.10.3	Verify each CREVS train actuates on an actual or simulated actuation signal, except for dampers and valves that are locked, sealed, or otherwise secured in the actuated position.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.7.10.4	Perform required CRE unfiltered air inleakage testing in accordance with the Control Room Envelope Habitability Program.	In accordance with the Control Room Envelope Habitability Program

3.7 PLANT SYSTEMS

3.7.11 Control Room Emergency Air Temperature Control System (CREATCS)

LCO 3.7.11 Two CREATCS trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, 4, 5, and 6,
During movement of irradiated fuel assemblies.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required CREATCS train inoperable. :	A.1 Restore CREATCS train to OPERABLE status.	30 days
B. ------------NOTE------------ Not applicable when a dual unit shutdown is required. -------------------------------- Required Action and associated Completion Time of Condition A not met in MODE 1, 2, 3, or 4.	B.1 Be in MODE 3. AND B.2 --------------NOTE-------------- LCO 3.0.4.a is not applicable when entering MODE 4. ------------------------------------- Be in MODE 4.	6 hours 12 hours
C. ------------NOTE------------ Only applicable when a dual unit shutdown is required. -------------------------------- Required Action and associated Completion Time of Condition A not met in MODE 1, 2, 3, or 4.	C.1 Be in MODE 3. AND C.2 --------------NOTE--------------- LCO 3.0.4.a is not applicable when entering MODE 4. ------------------------------------- Be in MODE 4.	12 hours 18 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
D. Required Action and associated Completion Time of Condition A not met in MODE 5 or 6, or during movement of irradiated fuel assemblies.	D.1	Place OPERABLE CREATCS train in operation.	Immediately
	<u>OR</u>		
	D.2	Suspend movement of irradiated fuel assemblies.	Immediately
E. Two required CREATCS trains inoperable in MODE 5 or 6, or during movement of irradiated fuel assemblies.	E.1	Suspend movement of irradiated fuel assemblies.	Immediately
F. Two required CREATCS trains inoperable in MODE 1, 2, 3, or 4.	F.1	Enter LCO 3.0.3.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.11.1	Verify control room air temperature is ≤ 120°F.	In accordance with the Surveillance Frequency Control Program

3.7 PLANT SYSTEMS

3.7.12 Fuel Storage Pool Water Level

LCO 3.7.12 The fuel storage pool water level shall be ≥ 56 ft 10 inches elevation.

APPLICABILITY: During movement of irradiated fuel assemblies in the fuel storage pool.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Fuel storage pool water level not within limit.	A.1 --------------NOTE-------------- LCO 3.0.3 is not applicable. ------------------------------------- Suspend movement of irradiated fuel assemblies in the fuel storage pool.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.12.1	Verify the fuel storage pool water level is ≥ 56 ft 10 inches elevation.	In accordance with the Surveillance Frequency Control Program

3.7 PLANT SYSTEMS

3.7.13 Fuel Storage Pool Boron Concentration

LCO 3.7.13 The fuel storage pool boron concentration shall be ≥ 2300 ppm.

APPLICABILITY: When fuel assemblies are stored in the fuel storage pool and a fuel storage pool verification has not been performed since the last movement of fuel assemblies in the fuel storage pool.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Fuel storage pool boron concentration not within limit.	--------------------NOTE------------------- LCO 3.0.3 is not applicable. ---	
	A.1 Suspend movement of fuel assemblies in the fuel storage pool.	Immediately
	<u>AND</u>	
	A.2.1 Initiate action to restore fuel storage pool boron concentration to within limit.	Immediately
	<u>OR</u>	
	A.2.2 Initiate action to perform a fuel storage pool verification.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.13.1	Verify the fuel storage pool boron concentration is within limit.	In accordance with the Surveillance Frequency Control Program

3.7 PLANT SYSTEMS

3.7.14 Spent Fuel Storage

LCO 3.7.14 The combination of initial enrichment, burnup, and cooling time of each fuel assembly stored in the spent fuel pit shall be in accordance with the following:

a. No restrictions on storage of fresh or irradiated fuel assemblies in the cask area storage rack are applicable.

b. Fuel assemblies stored in Region I and II shall be stored in accordance with the requirements of Figures 3.7.14-1 through 3.7.14-3 with credit for burnup and cooling time taken in determining acceptable placement locations for spent fuel in the two-region spent fuel racks. Fresh and irradiated fuel assemblies in the Region I or Region II racks shall be stored in compliance with the following:

1. any 2x2 array of Region I storage cells containing fuel shall comply with the storage patterns in Figure 3.7.14-1 and the requirements of Tables 3.7.14-1 and 3.7.14-2, as applicable. The reactivity rank of fuel assemblies in the 2x2 array (rank determined using Table 3.7.14-3) shall be equal to or less reactive than that shown for the 2x2 array.

2. any 2x2 array of Region II storage cells containing fuel shall:

   i. comply with the storage patterns in Figure 3.7.14-2 and the requirements of Tables 3.7.14-1 and 3.7.14-2, as applicable. The reactivity rank of fuel assemblies in the 2x2 array (rank determined using Table 3.7.14-3) shall be equal to or less reactive than that shown for the 2x2 array,

   ii. have the same directional orientation for Metamic inserts in a contiguous group of 2x2 arrays where Metamic inserts are required, and

   iii. comply with the requirements of LCO 3.7.14.b.3. for cells adjacent to Region I racks.

3. Any 2x2 array of Region II storage cells that interface with Region I storage cells shall comply with the rules of Figure 3.7.14-3.

4. Any fuel assembly may be replaced with a fuel rod storage basket or non-fuel hardware.

LCO 3.7.14 (continued)

5. Storage of Metamic inserts or rod cluster control assemblies (RCCAs) is acceptable in locations designated as empty (water-filled) cells.

APPLICABILITY: Whenever any fuel assembly is stored in the spent fuel pit.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Requirements of the LCO not met.	A.1 --------------NOTE-------------- LCO 3.0.3 is not applicable. ------------------------------------ Initiate action to move the noncomplying fuel assembly to an acceptable location.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.14.1	Verify by administrative means the initial enrichment, burnup, and cooling time of the fuel assembly is in accordance with the Figure 3.7.14-1 through Figure 3.7.14-3.	Prior to storing the fuel assembly in Region I or II

Table 3.7.14-1 (page 1 of 1)

Blanketed Fuel - Coefficients to Calculate the Minimum Required Fuel Assembly Burnup (Bu) as a Function of Enrichment (En) and Cooling Time (Ct)
See Notes 1-4 for use of Table 3.7.14-1

Coeff.	Fuel Category						
	I-3	**I-4**	**II-1**	**II-2**	**II-3**	**II-4**	**II-5**
A1	5.66439153	-14.7363682	-7.74060457	-7.63345029	24.4656526	8.5452608	26.2860949
A2	-7.22610116	11.0284547	5.13978237	10.7798957	-20.3141124	-4.47257395	-18.0738662
A3	2.98646188	-1.80672781	-0.360186309	-2.81231555	6.53101471	2.09078914	5.8330891
A4	-0.287945644	0.119516492	0.0021681285	0.29284474	-0.581826027	-0.188280562	-0.517434342
A5	-0.558098618	0.0620559676	-0.0304713673	0.0795058096	-0.16567492	0.157548739	-0.0614152031
A6	0.476169245	0.0236575787	0.098844889	-0.0676341983	0.243843226	-0.0593584027	0.134626308
A7	-0.117591963	-0.0088144551	-0.0277584786	0.0335130877	-0.0712130368	0.0154678626	-0.0383060399
A8	0.0095165354	0.0008957348	0.0024057185	-0.0040803875	0.0063998706	-0.0014068318	0.0033419846
A9	-47.1782783	-20.2890089	-21.424984	14.6716317	-41.1150	-0.881964768	-12.1780
A10	33.4270029	14.7485847	16.255208	-10.0312224	43.9149156	9.69128392	23.6179517
A11	-6.11257501	-1.22889103	-1.77941882	5.62580894	-9.6599923	-0.18740168	-4.10815592
A12	0.490064351	0.0807808548	0.127321203	-0.539361868	0.836931842	0.0123398618	0.363908736

Notes:

1. All relevant uncertainties are explicitly included in the criticality analysis. For instance, no additional allowance for burnup uncertainty or enrichment uncertainty is required. For a fuel assembly to meet the requirements of a Fuel Category, the assembly burnup must exceed the “minimum burnup” (GWd/MTU) given by the curve fit for the assembly “cooling time” and “initial enrichment.” The specific minimum burnup required for each fuel assembly is calculated from the following equation:

   $$Bu = (A_1 + A_2{*}En + A_3{*}En^2 + A_4{*}En^3){*}\ \exp[-(A_5 + A_6{*}En + A_7{*}En^2 + A_8{*}En^3){*}Ct] + A_9 + A_{10}{*}En + A_{11}{*}En^2 + A_{12}{*}En^3$$

2. Initial enrichment, En, is the nominal central zone U-235 enrichment. Axial blanket material is not considered when determining enrichment. Any enrichment between 2.0 and 5.0 may be used.

3. Cooling time, Ct, is in years. Any cooling time between 0 years and 25 years may be used. An assembly with a cooling time greater than 25 years must use 25 years.

4. This Table applies for any blanketed fuel assembly.

Table 3.7.14-2 (page 1 of 1)

Non-Blanketed Fuel - Coefficients to Calculate the Minimum Required Fuel Assembly Burnup (Bu) as a Function of Enrichment (En) and Cooling Time (Ct)
See Notes 1-4 for use of Table 3.7.14-2

Coeff.	**Fuel Category**						
	I-3	**I-4**	**II-1**	**II-2**	**II-3**	**II-4**	**II-5**
A1	2.04088171	-27.6637884	-11.2686777	20.7284208	29.8862876	-83.5409405	35.5058622
A2	-4.83684164	26.1997193	2.0659501	11.9673275	-37.0771132	94.7973724	-30.1986997
A3	2.59801889	-7.2982252	2.66204924	-14.4072388	16.3986049	-31.9583373	11.0102438
A4	-0.300597247	0.723731768	-0.513334362	2.83623963	-2.1571669	3.55898487	-1.27269125
A5	-0.610041808	0.401332891	-0.0987986108	-1.49118695	1.02330848	0.299948492	1.34723758
A6	0.640497159	-0.418616707	-0.0724198633	1.75361041	-1.21889631	-0.312341996	-1.19871392
A7	-0.219000712	0.144304039	0.106248806	-0.659046438	0.467440882	0.107463895	0.352920811
A8	0.0252870451	-0.0154239536	-0.0197359109	0.080884618	-0.0560129443	-0.0108814287	-0.0325155213
A9	-4.48207836	-5.54507376	-1.34620551	-245.825283	12.1549	39.4975573	-5.2576
A10	-2.12118634	-5.76555416	-10.1728821	243.59979	-22.7755385	-50.5818253	10.1733379
A11	2.91619317	6.29118025	8.71968815	-75.7805818	14.3755458	23.3093829	0.369083041
A12	-0.196645176	-0.732079719	-1.14461356	8.10936356	-1.80803352	-2.69466612	0.0443577624

Notes:

1. All relevant uncertainties are explicitly included in the criticality analysis. For instance, no additional allowance for burnup uncertainty or enrichment uncertainty is required. For a fuel assembly to meet the requirements of a Fuel Category, the assembly burnup must exceed the “minimum burnup” (GWd/MTU) given by the curve fit for the assembly “cooling time” and “initial enrichment.” The specific minimum burnup required for each fuel assembly is calculated from the following equation:

   $$Bu = (A_1 + A_2*En + A_3*En^2 + A_4*En^3)* \exp [- (A_5 + A_6*En + A_7*En^2 + A_8*En^3)*Ct] + A_9 + A_{10}*En + A_{11}*En^2 + A_{12}*En^3$$

2. Initial enrichment, En, is the nominal U-235 enrichment. Any enrichment between 1.8 and 4.0 may be used.

3. Cooling time, Ct, is in years. Any cooling time between 15 years and 25 years may be used. An assembly with a cooling time greater than 25 years must use 25 years.

4. This Table applies only for pre-extended power uprate (EPU) non-blanketed fuel assemblies. If a non-blanketed assembly is depleted at EPU conditions, none of the burnup accrued at EPU conditions can be credited (i.e., only burnup accrued at pre-EPU conditions may be used as burnup credit).

Table 3.7.14-3 (page 1 of 1)

Fuel Categories Ranked by Reactivity
See Notes 1-5 for use of Table 3.7.14-3

Region I	I-1	High Reactivity
	I-2	
	I-3	
	I-4	Low Reactivity
Region II	II-1	High Reactivity
	II-2	
	II-3	
	II-4	
	II-5	Low Reactivity

Notes:

1. Fuel Category is ranked by decreasing order of reactivity without regard for any reactivity-reducing mechanisms, e.g., Category I-2 is less reactive than Category I-1, etc. The more reactive fuel categories require compensatory measures to be placed in Regions I and II of the spent fuel pit, e.g., use of water filled cells, Metamic inserts, or full length RCCAs.

2. Any higher numbered fuel category can be used in place of a lower numbered fuel category from the same Region.

3. Category I-1 is fresh unburned fuel up to 5.0 wt% U-235 enrichment.

4. Category I-2 is fresh unburned fuel that obeys the Integral Fuel Burnable Adsorber (IFBA) requirements of Table 3.7.14-4.

5. All Categories except I-1 and I-2 are determined from Tables 3.7.14-1 and 3.7.14-2.

Table 3.7.14-4 (page 1 of 1)

IFBA Requirements for Fuel Category I-2

Nominal Enrichment (wt% U-235)	Minimum Required Number of IFBA Pins
Enr. ≤ 4.3	0
4.3 < Enr. ≤ 4.4	32
4.4 < Enr. ≤ 4.7	64
4.7 < Enr. ≤ 5.0	80

Figure 3.7.14-1 (page 1 of 1)

Allowable Region I Storage Arrays
See Notes 1-8 for use of Figure 3.7.14-1

<u>DEFINITION</u> <u>ILLUSTRATION</u>

<u>Array I-A</u>
Checkerboard pattern of Category I-1 assemblies and empty (water-filled) cells.

I-1	**X**
X	I-1

<u>Array I-B</u>
Category I-4 assembly in every cell.

I-4	I-4
I-4	I-4

<u>Array I-C</u>
Combination of Category I-2 and I-4 assemblies. Each Category I-2 assembly shall contain a full length RCCA.

I-2	I-4
I-4	I-4

I-2	I-2
I-4	I-4

I-2	I-2
I-2	I-4

I-2	I-2
I-2	I-2

<u>Array I-D</u>
Category I-3 assembly in every cell. One of every four assemblies contains a full length RCCA.

I-3	I-3
I-3	I-3

<u>Notes</u>:

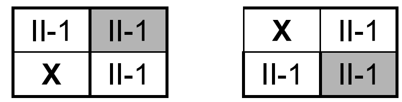
1. In all arrays, an assembly of lower reactivity can replace an assembly of higher reactivity.
2. Category I-1 is fresh unburned fuel up to 5.0 wt% U-235 enrichment.
3. Category I-2 is fresh unburned fuel that obeys the IFBA requirements in Table 3.7.14-4.
4. Categories I-3 and I-4 are determined from Tables 3.7.14-1 and 3.7.14-2.
5. Shaded cells indicate that the fuel assembly contains a full length RCCA.
6. **X** indicates an empty (water-filled) cell.
7. Attributes for each 2x2 array are as stated in the definition. Diagram is for illustrative purposes only.
8. An empty (water-filled) cell may be substituted for any fuel containing cell in all storage arrays.

Figure 3.7.14-2 (page 1 of 1)

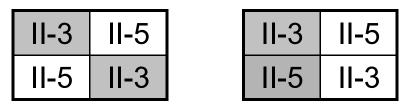
Allowable Region II Storage Arrays
See Notes 1-6 for use of Figure 3.7.14-2

<u>DEFINITION</u> | <u>ILLUSTRATION</u>

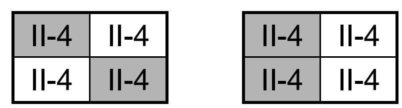
<u>Array II-A</u>
Category II-1 assembly in three of every four cells;
one of every four cells is empty (water-filled);
the cell diagonal from the empty cell contains a Metamic insert or full length RCCA.



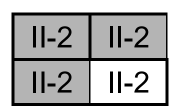
<u>Array II-B</u>
Checkerboard pattern of Category II-3 and II-5 assemblies
With two of every four cells containing a Metamic insert or full length RCCA.



<u>Array II-C</u>
Category II-4 assembly in every cell with two of every four
Cells containing a Metamic insert or full length RCCA.



<u>Array II-D</u>
Category II-2 assembly in every cell with three of every four
Cells containing a Metamic insert or full length RCCA.



<u>Notes</u>:

1. In all arrays, an assembly of lower reactivity can replace an assembly of higher reactivity.
2. Fuel categories are determined from Tables 3.7.14-1 and 3.7.14-2.
3. Shaded cells indicate that the cell contains a Metamic insert or the fuel assembly contains a full length RCCA.
4. **X** indicates an empty (water-filled) cell.
5. Attributes for each 2x2 array are as stated in the definition. Diagram is for illustrative purposes only.
6. An empty (water-filled) cell may be substituted for any fuel containing cell in all storage arrays.

Figure 3.7.14-3 (page 1 of 1)

Interface Restrictions Between Region I and Region II Arrays
See Notes 1-8 for use of Figure 3.7.14-3

DEFINITION

Array II-A, as defined in Figure 3.7.14-2, when placed on The interface with Region I shall have the empty cell in the row adjacent to the Region I rack.

ILLUSTRATION

Region I Rack

I-4	I-4	I-4	I-4
I-4	I-4	I-4	I-4
II-1	**X**	II-1	**X**
II-1	II-1	II-1	II-1

Array II-A

Arrays II-B, II-C and II-D, as defined in Figure 3.7.14-2, when placed on the interface with Region I shall have an insert in every cell in the row adjacent to the Region I rack.

Region I Rack

I-4	I-4	I-4	I-4
I-4	I-4	I-4	I-4
II-3	II-5	II-3	II-5
II-5	II-3	II-5	II-3

Array II-B

Region I Rack

I-4	I-4	I-4	I-4
I-4	I-4	I-4	I-4
II-4	II-4	II-4	II-4
II-4	II-4	II-4	II-4

Array II-C

Region I Rack

I-4	I-4	I-4	I-4
I-4	I-4	I-4	I-4
II-2	II-2	II-2	II-2
II-2	II-2	II-2	II-2

Array II-D

Notes:

1. In all arrays, an assembly of lower reactivity can replace an assembly of higher reactivity.

2. Fuel categories are determined from Tables 3.7.14-1 and 3.7.14-2.

3. Shaded cells indicate that the cell contains a Metamic insert or the fuel assembly contains a full length RCCA.

4. **X** indicates an empty (water-filled) cell.

5. Attributes for each 2x2 array are as stated in the definition. Diagram is for illustrative purposes only. Region I Array I-B is depicted as the example; however, any Region I array is allowed provided that

    a. For Array I-D, the RCCA shall be in the row adjacent to the Region II rack, and

    b. Array I-A shall not interface with Array II-D.

6. If no fuel is stored adjacent to Region II in Region I, then the interface restrictions are not applicable.

7. Figure 3.7.14-3 is applicable only to the Region I - Region II interface. There are no restrictions for the interfaces with the cask area rack.

8. An empty (water-filled) cell may be substituted for any fuel containing cell in all storage arrays.

3.8 ELECTRICAL POWER SYSTEMS

3.8.1 AC Sources - Operating

LCO 3.8.1 The following AC electrical sources shall be OPERABLE:

a. Two qualified circuits between the offsite transmission network and the unit onsite Class 1E AC Electrical Power Distribution System,

b. Two unit emergency diesel generators (EDGs) capable of supplying the onsite Class 1E power distribution subsystem(s),

c. One qualified circuit between the offsite transmission network and the opposite unit onsite Class 1E AC electrical power distribution train(s) needed to support equipment required by LCO 3.5.2, "ECCS – Operating," LCO 3.7.10, "Control Room Emergency Ventilation System (CREVS)," LCO 3.7.11, "Control Room Emergency Air Temperature Control System (CREATCS)," and LCO 3.8.4, "DC Sources – Operating,"

d. Required opposite unit EDG(s) capable of supplying power to equipment required by LCO 3.5.2, LCO 3.7.10, LCO 3.7.11, and LCO 3.8.4, and

e. Automatic load sequencers for Train A and Train B.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

---NOTE---
LCO 3.0.4.b is not applicable to EDGs.

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One unit offsite circuit inoperable.	A.1	Perform SR 3.8.1.1 for OPERABLE offsite circuit.	1 hour AND Once per 8 hours thereafter
	AND		

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. (continued)	A.2	Declare required feature(s) with no offsite power available inoperable when its redundant required feature(s) is inoperable.	24 hours from discovery of no offsite power to one train concurrent with inoperability of redundant required feature(s)
	AND		
	A.3	Restore offsite circuit to OPERABLE status.	72 hours OR In accordance with the Risk Informed Completion Time
B. One required opposite unit offsite circuit inoperable.	B.1	Perform SR 3.8.1.1 for required OPERABLE offsite circuits.	1 hour AND Once per 8 hours thereafter
	AND		
	B.2	Declare required feature(s) with no offsite power available inoperable when its redundant required feature(s) is inoperable.	24 hours from discovery of no offsite power to one train concurrent with inoperability of redundant required feature(s)
	AND		
	B.3	Restore required opposite unit offsite circuit to OPERABLE status.	30 days

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. One required EDG inoperable.	C.1 Perform SR 3.8.1.1 for the offsite circuit(s).	1 hour AND Once per 8 hours thereafter
	AND	
	C.2 Declare required feature(s) supported by the inoperable EDG inoperable when its required redundant feature(s) is inoperable.	4 hours from discovery of Condition C concurrent with inoperability of redundant required feature(s)
	AND	
	C.3.1 Determine OPERABLE EDG(s) is not inoperable due to common cause failure.	24 hours
	OR	
	C.3.2 Perform SR 3.8.1.2 for OPERABLE EDG(s).	24 hours
	AND	
	C.4 Restore required EDG to OPERABLE status.	14 days OR In accordance with the Risk Informed Completion Time Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
D. Two unit offsite circuits inoperable. OR Three offsite circuits inoperable.	D.1	Declare required feature(s) inoperable when its redundant required feature(s) is inoperable.	12 hours from discovery of Condition D concurrent with inoperability of redundant required features
	AND		
	D.2	Restore one unit offsite circuit to OPERABLE status.	24 hours
E. One or two required offsite circuits inoperable. AND One required EDG inoperable.	--------------------NOTE------------------- Enter applicable Conditions and Required Actions of LCO 3.8.9, "Distribution Systems - Operating," when Condition E is entered with no AC power source to any train. --		
	E.1	Restore required offsite circuit(s) to OPERABLE status.	72 hours OR In accordance with the Risk Informed Completion Time Program
	OR		
	E.2	Restore required EDG to OPERABLE status.	72 hours OR In accordance with the Risk Informed Completion Time Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
F. One unit EDG inoperable and one required opposite unit EDG inoperable. <u>OR</u> Two required opposite unit EDGs inoperable.	F.1	Verify two high head safety injection subsystems are capable of being powered from OPERABLE EDGs.	2 hours
	<u>AND</u>		
	F.2	Verify two control room air handling units are capable of being powered from OPERABLE EDGs.	2 hours
	<u>AND</u>		
	F.3	Verify one CREVS train is capable of being powered from an OPERABLE EDG.	2 hours
	<u>AND</u>		
	F.4	Verify one CREATCS train is capable of being powered from an OPERABLE EDG.	2 hours
	<u>AND</u>		
	F.5	Restore one required EDG to OPERABLE status.	72 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
G. Two or more required EDGs inoperable for reasons other than Condition F.	G.1 Restore all but one required EDG to OPERABLE status.	2 hours
H. One automatic load sequencer inoperable.	H.1 Restore automatic load sequencer to OPERABLE status.	72 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program
I. -----------NOTE------------- Not applicable when a dual unit shutdown is required. -------------------------------- Required Action and associated Completion Time of Condition A, B, C, D, E, F, G, or H not met.	I.1 Be in MODE 3. <u>AND</u> I.2 --------------NOTE-------------- LCO 3.0.4.a is not applicable when entering MODE 4. ------------------------------------- Be in MODE 4.	6 hours 12 hours
J. ---------NOTES------------- Only applicable when a dual unit shutdown is required. -------------------------------- Required Action and associated Completion Time of Condition A, B, C, D, E, F, G, or H not met.	J.1 Be in MODE 3. <u>AND</u> J.2 --------------NOTE-------------- LCO 3.0.4.a is not applicable when entering MODE 4. ------------------------------------- Be in MODE 4.	12 hours 18 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
K. One required EDG inoperable and two unit offsite circuits inoperable. <u>OR</u> One required EDG inoperable and three offsite circuits inoperable. <u>OR</u> Two or more required offsite circuits inoperable and two or more required EDGs inoperable.	K.1 Enter LCO 3.0.3.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.1.1	Verify correct breaker alignment and indicated power availability for each offsite circuit.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.8.1.2	------------------------------NOTES----------------------------- 1. All EDG starts may be preceded by an engine prelube period and followed by a warmup period prior to loading. 2. A modified EDG start involving idling and gradual acceleration to synchronous speed may be used for this SR as recommended by the manufacturer. When modified start procedures are not used, the time, voltage, and frequency tolerances of SR 3.8.1.7 must be met. --- Verify each EDG starts from standby conditions and achieves steady state voltage ≥ 3950 V and ≤ 4350 V, and frequency ≥ 59.4 Hz and ≤ 60.6 Hz.	In accordance with the Surveillance Frequency Control Program
SR 3.8.1.3	------------------------------NOTES----------------------------- 1. EDG loadings may include gradual loading as recommended by the manufacturer. 2. Momentary transients outside the load range do not invalidate this test. 3. This Surveillance shall be conducted on only one EDG at a time. 4. This SR shall be preceded by and immediately follow without shutdown a successful performance of SR 3.8.1.2 or SR 3.8.1.7. --- Verify each EDG is synchronized and loaded and operates for ≥ 60 minutes at a load ≥ 2300 kW and ≤ 2500 kW (Unit 3), ≥ 2650 kW and ≤ 2850 kW (Unit 4).	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.8.1.4	Verify each EDG has the following fuel oil volume: a. Unit 3 EDGs day tank and skid tank contains ≥ 2000 gallons of fuel oil. b. Unit 4 EDGs day tank contains ≥ 230 gallons of fuel oil.	In accordance with the Surveillance Frequency Control Program
SR 3.8.1.5	Check for and remove accumulated water from each day tank and Unit 3 skid mounted tank.	In accordance with the Surveillance Frequency Control Program
SR 3.8.1.6	-----------------------------NOTE------------------------------ Not required to be met for Unit 3 EDGs during use of a temporary Class III fuel storage system as allowed by LCO 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air." --- Verify the fuel oil transfer system operates to automatically transfer fuel oil from the storage tank to the day tank.	In accordance with the Surveillance Frequency Control Program
SR 3.8.1.7	-----------------------------NOTE------------------------------ All EDG starts may be preceded by an engine prelube period. --- Verify each EDG starts from standby condition and achieves in ≤ 15 seconds, voltage ≥ 3950 V and ≤ 4350 V, and frequency ≥ 59.4 Hz and ≤ 60.6 Hz.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.8.1.8	Verify manual transfer of AC power sources from the auxiliary transformer to the startup transformer.	In accordance with the Surveillance Frequency Control Program
SR 3.8.1.9	-----------------------------NOTES---------------------------- 1. For the unit EDGs, this Surveillance shall not normally be performed in MODE 1 or 2. However, this Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced. Credit may be taken for unplanned events that satisfy this SR. 2. If performed with the EDG synchronized with offsite power, it shall be performed at a power factor less than or equal to the power factor of the single largest post accident load. However, if grid conditions do not permit, the power factor limit is not required to be met. Under this condition the power factor shall be maintained as close to the limit as practicable. ---	
	Verify each EDG rejects a load greater than or equal to its associated single largest post-accident load, and: a. Following load rejection, the frequency is ≤ 66.25 Hz, b. Within 2 seconds following load rejection, the voltage is ≥ 3950 V and ≤ 4350 V, and c. Within 2 seconds following load rejection, the frequency is ≥ 59.4 Hz and ≤ 60.6 Hz.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.8.1.10	------------------------------NOTES------------------------------ 1. For the unit EDGs, this Surveillance shall not normally be performed in MODE 1 or 2. However, this Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced. Credit may be taken for unplanned events that satisfy this SR. 2. If performed with EDG synchronized with offsite power, it shall be performed at a power factor less than or equal to that determined by the diesel loading analysis. However, if grid conditions do not permit, the power factor limit is not required to be met. Under this condition the power factor shall be maintained as close to the limit as practicable. ---	
	Verify each EDG does not trip and voltage returns to ≤ 4784 V within 2 seconds following a load rejection of ≥ 2500 kW (Unit 3), ≥ 2874 kW (Unit 4).	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.8.1.11	-----------------------------NOTES---------------------------- 1. All EDG starts may be preceded by an engine prelube period. 2. For the unit EDGs, this Surveillance shall not normally be performed in MODE 1, 2, 3, or 4. However, portions of the Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced. Credit may be taken for unplanned events that satisfy this SR. ---	
	Verify on an actual or simulated loss of offsite power signal: a. De-energization of emergency buses, b. Load shedding from emergency buses, c. EDG auto-starts from standby condition and: 1. Energizes permanently connected loads in ≤ 15 seconds, 2. Energizes auto-connected shutdown loads through automatic load sequencer, 3. Maintains steady state voltage ≥ 3950 V and ≤ 4350 V, 4. Maintains steady state frequency ≥ 59.4 Hz and ≤ 60.6 Hz, and 5. Supplies permanently connected and auto-connected shutdown loads for ≥ 5 minutes.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.8.1.12	-----------------------------NOTES---------------------------- 1. All EDG starts may be preceded by prelube period. 2. For the unit EDGs, this Surveillance shall not normally be performed in MODE 1 or 2. However, portions of the Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced. Credit may be taken for unplanned events that satisfy this SR. ---	
	Verify on an actual or simulated Engineered Safety Feature (ESF) actuation signal each EDG auto-starts from standby condition and: a. In ≤ 15 seconds after auto-start and during tests, achieves voltage ≥ 3950 V and frequency ≥ 59.4 Hz, b. Achieves steady state voltage ≥ 3950 V and ≤ 4350 V and frequency ≥ 59.4 Hz and ≤ 60.6 Hz, c. Operates for ≥ 5 minutes, d. Permanently connected loads remain energized from the offsite power system, and e. Emergency loads are energized or auto-connected through the automatic load sequencer from the offsite power system.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.8.1.13	-----------------------------NOTE----------------------------- For the unit EDGs, this Surveillance shall not normally be performed in MODE 1 or 2. However, this Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced. Credit may be taken for unplanned events that satisfy this SR. --	
	Verify EDG trips made OPERABLE during the test mode of EDG operation are inoperable on actual or simulated loss of voltage signal on the emergency bus concurrent with an actual or simulated ESF actuation signal.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.8.1.14	------------------------------NOTES------------------------------ 1. Momentary transients outside the load and power factor ranges do not invalidate this test. 2. If performed with EDG synchronized with offsite power, it shall be performed at a power factor less than or equal to that determined by the diesel loading analysis. However, if grid conditions do not permit, the power factor limit is not required to be met. Under this condition the power factor shall be maintained as close to the limit as practicable. --	
	Verify each EDG operates for ≥ 24 hours: a. For ≥ 2 hours loaded ≥ 2550 kW and ≤ 2750 kW (Unit 3), ≥ 2950 kW and ≤ 3150 kW (Unit 4) and b. For the remaining hours of the test loaded ≥ 2300 kW and ≤ 2500 kW (Unit 3), ≥ 2650 kW and ≤ 2850 kW (Unit 4).	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.8.1.15	------------------------------NOTES---------------------------- 1. This Surveillance shall be performed within 5 minutes of shutting down the EDG after the EDG has operated ≥ 2 hours loaded ≥ 2300 kW and ≤ 2500 kW (Unit 3), ≥ 2650 kW and ≤ 2850 kW (Unit 4). Momentary transients outside of load range do not invalidate this pre-test requirement. 2. All EDG starts may be preceded by an engine prelube period. --- Verify each EDG starts and achieves: a. In ≤ 15 seconds, voltage ≥ 3950 V and frequency ≥ 59.4 Hz and b. Steady state voltage ≥ 3950 V, and ≤ 4350 V and frequency ≥ 59.4 Hz and ≤ 60.6 Hz.	In accordance with the Surveillance Frequency Control Program
SR 3.8.1.16	------------------------------NOTE------------------------------- For the unit EDGs, this Surveillance shall not normally be performed in MODE 1, 2, 3, or 4. However, this Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced. Credit may be taken for unplanned events that satisfy this SR. --- Verify each EDG: a. Synchronizes with offsite power source while loaded with emergency loads upon a simulated restoration of offsite power, b. Transfers loads to offsite power source, and c. Returns to ready-to-load operation.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.8.1.17	-----------------------------NOTE------------------------------ For the unit EDGs, this Surveillance shall not normally be performed in MODE 1, 2, 3, or 4. However, portions of the Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced. Credit may be taken for unplanned events that satisfy this SR. --- Verify, with a EDG operating in test mode and connected to its bus, an actual or simulated ESF actuation signal overrides the test mode by: a. Returning EDG to ready-to-load operation and b. Automatically energizing the emergency load from offsite power.	In accordance with the Surveillance Frequency Control Program
SR 3.8.1.18	-----------------------------NOTE------------------------------ For the unit EDGs, this Surveillance shall not normally be performed in MODE 1, 2, 3, or 4. However, this Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced. Credit may be taken for unplanned events that satisfy this SR. --- Verify interval between each sequenced load block is within ± 10% of design interval for each emergency load sequencer.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.8.1.19	-----------------------------NOTES---------------------------- 1. All EDG starts may be preceded by an engine prelube period. 2. For the unit EDGs, this Surveillance shall not normally be performed in MODE 1, 2, 3, or 4. However, portions of the Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced. Credit may be taken for unplanned events that satisfy this SR. ---	
	Verify on an actual or simulated loss of offsite power signal in conjunction with an actual or simulated ESF actuation signal: a. De-energization of emergency buses, b. Load shedding from emergency buses, and c. EDG auto-starts from standby condition and: 1. Energizes permanently connected loads in ≤ 15 seconds, 2. Energizes auto-connected emergency loads through load sequencer, 3. Achieves steady state voltage ≥ 3950 V and ≤ 4350 V, 4. Achieves steady state frequency ≥ 59.4 Hz and ≤ 60.6 Hz, and 5. Supplies permanently connected and auto-connected emergency loads for ≥ 5 minutes.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

	SURVEILLANCE	FREQUENCY
SR 3.8.1.20	-----------------------------NOTE------------------------------ All EDG starts may be preceded by an engine prelube period. -- Verify when started simultaneously from standby condition, each required EDG achieves: a. In ≤ 15 seconds, voltage ≥ 3950 V and frequency ≥ 59.4 Hz and b. Steady state voltage ≥ 3950 V and ≤ 4350 V, and frequency ≥ 59.4 Hz and ≤ 60.6 Hz.	In accordance with the Surveillance Frequency Control Program

3.8 ELECTRICAL POWER SYSTEMS

3.8.2 AC Sources - Shutdown

LCO 3.8.2 The following AC electrical power sources shall be OPERABLE:

a. One qualified circuit, or an alternate circuit, between the offsite transmission network and the onsite Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.10, "Distribution Systems - Shutdown" and

b. One emergency diesel generator (EDG) capable of supplying one train of the onsite Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.10.

APPLICABILITY: MODES 5 and 6,
During movement of irradiated fuel assemblies.

ACTIONS

--NOTE---

LCO 3.0.3 is not applicable.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required offsite circuit inoperable.	-------------------NOTE-------------------- Enter applicable Conditions and Required Actions of LCO 3.8.10, with one required train de-energized as a result of Condition A. --	
	A.1 Declare affected required feature(s) with no offsite power available inoperable.	Immediately
	<u>OR</u>	

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.2.1 Suspend movement of irradiated fuel assemblies.	Immediately
	AND	
	A.2.2 Suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration.	Immediately
	AND	
	A.2.3 Initiate action to restore required offsite power circuit to OPERABLE status.	Immediately
B. One required EDG inoperable.	B.1 Suspend movement of irradiated fuel assemblies.	Immediately
	AND	
	B.2 Suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration.	Immediately
	AND	
	B.3 Initiate action to restore required EDG to OPERABLE status.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.2.1	------------------------------NOTE------------------------------ The following SRs are not required to be performed: SR 3.8.1.3, SR 3.8.1.9 through SR 3.8.1.11, SR 3.8.1.13 through SR 3.8.1.16, and SR 3.8.1.18. --- For AC sources required to be OPERABLE, the SRs of Specification 3.8.1, "AC Sources - Operating," except SR 3.8.1.8, SR 3.8.1.12, SR 3.8.1.17, SR 3.8.1.19, and SR 3.8.1.20, are applicable.	In accordance with applicable SRs

3.8 ELECTRICAL POWER SYSTEMS

3.8.3 Diesel Fuel Oil, Lube Oil, and Starting Air

LCO 3.8.3 The stored diesel fuel oil, lube oil, and starting air subsystem shall be within limits for each required emergency diesel generator (EDG).

---NOTE---
The Unit 3 fuel oil storage subsystem may be considered within limits for 10 days when a temporary Class III fuel oil storage subsystem containing greater than or equal to a 7 day supply of fuel oil is used during the Unit 3 fuel oil storage tank cleaning while Unit 3 is in MODES 5, 6, or defueled.

APPLICABILITY: When associated EDG is required to be OPERABLE.

ACTIONS

---NOTE---
Separate Condition entry is allowed for each EDG.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more EDGs with fuel level less than a 7 day supply and greater than a 6 day supply in storage tank.	A.1 Restore fuel oil level to within limits.	48 hours
B. One or more EDGs with lube oil inventory less than a 7 day supply and greater than a 6 day supply.	B.1 Restore lube oil inventory to within limits.	48 hours
C. One or more EDGs with stored fuel oil total particulates not within limit.	C.1 Restore fuel oil total particulates to within limits.	7 days

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
D. One or more EDGs with new fuel oil properties not within limits.	D.1	Restore stored fuel oil properties to within limits.	30 days
E. One or more EDGs with required starting air receiver pressure < 5 start air pressure and ≥ 160 psig.	E.1	Restore starting air receiver pressure to ≥ 5 start air pressure.	48 hours
F. Required Action and associated Completion Time not met. OR One or more EDGs with diesel fuel oil, lube oil, or starting air subsystem not within limits for reasons other than Condition A, B, C, D, or E.	F.1	Declare associated EDG inoperable.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.3.1	Verify each fuel oil storage tank contains ≥ a 7 day supply of fuel.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.8.3.2	Verify lubricating oil inventory is ≥ a 7 day supply.	In accordance with the Surveillance Frequency Control Program
SR 3.8.3.3	Verify fuel oil properties of new and stored fuel oil are tested in accordance with, and maintained within the limits of, the Diesel Fuel Oil Testing Program.	In accordance with the Diesel Fuel Oil Testing Program
SR 3.8.3.4	Verify each EDG air start receiver pressure is ≥ 5 start air pressure.	In accordance with the Surveillance Frequency Control Program
SR 3.8.3.5	Check for and remove accumulated water from each fuel oil storage tank.	In accordance with the Surveillance Frequency Control Program

3.8 ELECTRICAL POWER SYSTEMS

3.8.4 DC Sources - Operating

LCO 3.8.4 Four DC electrical power trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One required battery charger on one train inoperable.	A.1	Restore battery terminal voltage to greater than or equal to the minimum established float voltage.	2 hours
	<u>AND</u>		
	A.2	Verify battery float current ≤ 2 amps.	Once per 12 hours
	<u>AND</u>		
	A.3	Restore required battery charger to OPERABLE status.	72 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program
B. ------------NOTE------------ Only applicable when opposite unit is not in MODE 1, 2, 3, or 4. --------------------------------- One DC electrical power train inoperable for reasons other than Condition A.	B.1	Restore DC electrical power train to OPERABLE status.	24 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
C. One DC electrical power train inoperable for reasons other than Condition A or B.	C.1	Restore DC electrical power train to OPERABLE status.	2 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program
D. Required Action and associated Completion Time not met.	D.1	Be in MODE 3.	12 hours
	<u>AND</u>		
	D.2	--------------NOTE-------------- LCO 3.0.4.a is not applicable when entering MODE 4. ------------------------------------- Be in MODE 4.	18 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.4.1	Verify battery terminal voltage is greater than or equal to the minimum established float voltage.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.8.4.2	Verify each battery charger supplies ≥ 400 amps (battery chargers associated with battery banks 3A and 4B) and ≥ 300 amps (battery chargers associated with battery banks 3B and 4A) at greater than or equal to the minimum established float voltage for ≥ 8 hours. <u>OR</u> Verify each battery charger can recharge the battery to the fully charged state within 24 hours while supplying the largest combined demands of the various continuous steady state loads, after a battery discharge to the bounding design basis event discharge state.	In accordance with the Surveillance Frequency Control Program
SR 3.8.4.3	-----------------------------NOTES---------------------------- 1. The modified performance discharge test in SR 3.8.6.6 may be performed in lieu of SR 3.8.4.3. 2. This Surveillance shall not be performed on inservice batteries in MODE 1, 2, 3, or 4. Credit may be taken for unplanned events that satisfy this SR. -- Verify battery capacity is adequate to supply, and maintain in OPERABLE status, the required emergency loads for the design duty cycle when subjected to a battery service test.	In accordance with the Surveillance Frequency Control Program

3.8 ELECTRICAL POWER SYSTEMS

3.8.5 DC Sources - Shutdown

LCO 3.8.5 Three trains of the DC electrical power subsystem shall be OPERABLE.

APPLICABILITY: MODES 5 and 6,
During movement of irradiated fuel assemblies.

ACTIONS

--NOTE--

LCO 3.0.3 is not applicable.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required battery charger on one train inoperable. AND The redundant required batteries and chargers OPERABLE.	A.1 Restore battery terminal voltage to greater than or equal to the minimum established float voltage. AND A.2 Verify battery float current ≤ 2 amps. AND A.3 Restore battery charger to OPERABLE status.	2 hours Once per 12 hours 72 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. One or more required DC electrical power trains inoperable for reasons other than Condition A. OR Required Actions and associated Completion Time of Condition A not met.	B.1 Declare affected required feature(s) inoperable. OR B.2.1 Suspend movement of irradiated fuel assemblies. AND B.2.2 Suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration. AND B.2.3 Initiate action to restore required DC electrical power trains to OPERABLE status.	Immediately Immediately Immediately Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.5.1	-------------------------------NOTE------------------------------ The following SRs are not required to be performed: SR 3.8.4.2 and SR 3.8.4.3. -- For DC sources required to be OPERABLE, the following SRs are applicable: SR 3.8.4.1 SR 3.8.4.2 SR 3.8.4.3	In accordance with applicable SRs

3.8 ELECTRICAL POWER SYSTEMS

3.8.6 Battery Parameters

LCO 3.8.6 Battery parameters for the 125 VDC electrical power subsystem shall be within limits.

APPLICABILITY: When associated DC electrical power trains are required to be OPERABLE.

ACTIONS

---NOTE---

Separate Condition entry is allowed for each battery.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required batteries with one or more battery cells float voltage < 2.07 V.	A.1 Perform SR 3.8.4.1.	2 hours
	<u>AND</u>	
	A.2 Perform SR 3.8.6.1.	2 hours
	<u>AND</u>	
	A.3 Restore affected cell voltage ≥ 2.07 V.	24 hours
B. One or more required batteries with float current > 2 amps.	B.1 Perform SR 3.8.4.1.	2 hours
	<u>AND</u>	
	B.2 Restore battery float current to ≤ 2 amps.	12 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. -----------NOTE------------- Required Action C.2 shall be completed if electrolyte level was below the top of plates. -------------------------------- One or more required batteries with one or more cells electrolyte level less than minimum established design limits.	-------------------NOTE-------------------- Required Actions C.1 and C.2 are only applicable if electrolyte level was below the top of plates. ---	
	C.1 Restore electrolyte level to above top of plates.	8 hours
	<u>AND</u>	
	C.2 Verify no evidence of leakage.	12 hours
	<u>AND</u>	
	C.3 Restore electrolyte level to greater than or equal to minimum established design limits.	31 days
D. One or more required batteries with pilot cell electrolyte temperature less than minimum established design limits.	D.1 Restore battery pilot cell temperature to greater than or equal to minimum established design limits.	12 hours
E. One or more required batteries in redundant trains with battery parameters not within limits.	E.1 Restore battery parameters for batteries in two trains to within limits.	2 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
F. Required Action and associated Completion Time of Condition A, B, C, D, or E not met. OR One or more required batteries with one or more battery cells float voltage < 2.07 V and float current > 2 amps. OR Battery parameters not within limits for any reason other than Condition A, B, C, D, or E.	F.1	Declare associated battery inoperable.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.6.1	-------------------------------NOTE------------------------------ Not required to be met when battery terminal voltage is less than the minimum established float voltage of SR 3.8.4.1. --- Verify each required battery float current is ≤ 2 amps.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.8.6.2	Verify each battery pilot cell float voltage is ≥ 2.07 V.	In accordance with the Surveillance Frequency Control Program
SR 3.8.6.3	Verify each battery connected cell electrolyte level is greater than or equal to minimum established design limits.	In accordance with the Surveillance Frequency Control Program
SR 3.8.6.4	Verify each battery pilot cell temperature is greater than or equal to minimum established design limits.	In accordance with the Surveillance Frequency Control Program
SR 3.8.6.5	Verify each battery connected cell float voltage is ≥ 2.07 V.	In accordance with the Surveillance Frequency Control Program
SR 3.8.6.6	-------------------------------NOTE------------------------------ This Surveillance shall not be performed on inservice batteries in MODE 1, 2, 3, or 4. Credit may be taken for unplanned events that satisfy this SR. --- Verify battery capacity is ≥ 80% (87% for batteries 4B and D52 (spare) when used in place of battery 4B) of the manufacturer's rating when subjected to a performance discharge test or a modified performance discharge test.	In accordance with the Surveillance Frequency Control Program <u>AND</u>

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
SR 3.8.6.6 (continued)	12 months when battery shows degradation, or has reached 85% (75% for batteries 4B and D52 (spare) when used in place of battery 4B) of the expected life with capacity < 100% of manufacturer's rating <u>AND</u> 24 months when battery has reached 85% (75% for batteries 4B and D52 (spare) when used in place of battery 4B) of the expected life with capacity ≥ 100% of manufacturer's rating

3.8 ELECTRICAL POWER SYSTEMS

3.8.7 Inverters - Operating

LCO 3.8.7 The required inverters shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required inverter inoperable.	A.1 --------------NOTE-------------- Enter applicable Conditions and Required Actions of LCO 3.8.9, "Distribution Systems - Operating" with any AC vital bus de-energized. ------------------------------------- Restore inverter to OPERABLE status.	24 hours OR In accordance with the Risk Informed Completion Time Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
B. Required Action and associated Completion Time not met.	B.1	Be in MODE 3.	12 hours
	AND		
	B.2	--------------NOTE-------------- LCO 3.0.4.a is not applicable when entering MODE 4. ------------------------------------- Be in MODE 4.	18 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.7.1	Verify correct inverter voltage, frequency, and alignment to required AC vital buses.	In accordance with the Surveillance Frequency Control Program

3.8 ELECTRICAL POWER SYSTEMS

3.8.8 Inverters - Shutdown

LCO 3.8.8 Two inverters shall be OPERABLE.

APPLICABILITY: MODES 5 and 6,
During movement of irradiated fuel assemblies.

ACTIONS

--NOTE--
LCO 3.0.3 is not applicable.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required inverters inoperable.	A.1 Declare affected required feature(s) inoperable.	Immediately
	<u>OR</u>	
	A.2.1 Suspend movement of irradiated fuel assemblies.	Immediately
	<u>AND</u>	
	A.2.2 Suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration.	Immediately
	<u>AND</u>	
	A.2.3 Initiate action to restore required inverters to OPERABLE status.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.8.1	Verify correct inverter voltage, frequency, and alignments to required AC vital buses.	In accordance with the Surveillance Frequency Control Program

3.8 ELECTRICAL POWER SYSTEMS

3.8.9 Distribution Systems - Operating

LCO 3.8.9 The following electrical power distribution trains and subsystems shall be OPERABLE:

a. Two unit AC electrical power distribution trains,

b. Required opposite unit AC electrical power distribution train(s) to support equipment required by LCO 3.5.2, "ECCS – Operating," LCO 3.7.10, "Control Room Emergency Ventilation System (CREVS)," LCO 3.7.11, "Control Room Emergency Air Temperature Control System (CREATCS)," and LCO 3.8.4, "DC Sources – Operating,"

c. Four DC electrical power distribution trains,

d. Four unit AC vital electrical power distribution subsystems, and

e. Required opposite unit AC vital electrical power distribution subsystems to support LCO 3.5.2, LCO 3.7.10, LCO 3.7.11, and LCO 3.8.1, "AC Sources – Operating."

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required AC electrical power distribution trains inoperable.	A.1 --------------NOTE-------------- Enter applicable Conditions and Required Actions of LCO 3.8.4, "DC Sources - Operating," for DC power trains made inoperable by inoperable power distribution trains. ------------------------------------ Restore AC electrical power distribution train to OPERABLE status.	8 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program
B. One or more AC vital electrical power distribution subsystems inoperable.	B.1 Restore AC vital bus electrical power distribution subsystem(s) to OPERABLE status.	2 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program
C. ------------NOTE------------ Not applicable when opposite unit is in MODE 1, 2, 3, or 4. --------------------------------- One or more opposite unit DC electrical power distribution trains inoperable.	C.1 Restore DC electrical power distribution trains to OPERABLE status.	24 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
D. One or more DC electrical power distribution trains inoperable for reasons other than Condition C.	D.1	Restore DC electrical power distribution trains to OPERABLE status.	2 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program
E. ------------NOTE------------ Not applicable when a dual unit shutdown is required. --------------------------------- Required Action and associated Completion Time of Condition A, B, C, or D not met.	E.1 <u>AND</u> E.2	Be in MODE 3. --------------NOTE-------------- LCO 3.0.4.a is not applicable when entering MODE 4. ------------------------------------- Be in MODE 4.	6 hours 12 hours
F. ------------NOTE------------ Only applicable when a dual unit shutdown is required. --------------------------------- Required Action and associated Completion Time of Condition A, B, C, or D not met.	F.1 <u>AND</u> F.2	Be in MODE 3. --------------NOTE-------------- LCO 3.0.4.a is not applicable when entering MODE 4. ------------------------------------- Be in MODE 4.	12 hours 18 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
G. Two or more electrical power distribution trains or subsystems inoperable that result in a loss of safety function.	G.1 Enter LCO 3.0.3.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.9.1	Verify correct breaker alignments and voltage to required AC and DC electrical power distribution trains, and required AC vital electrical power distribution subsystems.	In accordance with the Surveillance Frequency Control Program

3.8 ELECTRICAL POWER SYSTEMS

3.8.10 Distribution Systems - Shutdown

LCO 3.8.10 The necessary portion of AC and DC electrical power distribution trains, and AC vital electrical power distribution subsystems shall be OPERABLE to support equipment required to be OPERABLE.

APPLICABILITY: MODES 5 and 6,
During movement of irradiated fuel assemblies.

ACTIONS

---NOTE---

LCO 3.0.3 is not applicable.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required AC or DC electrical power distribution trains, or AC vital electrical power distribution subsystems inoperable.	A.1 Declare associated supported required feature(s) inoperable.	Immediately
	<u>OR</u>	
	A.2.1 Suspend movement of irradiated fuel assemblies.	Immediately
	<u>AND</u>	
	A.2.2 Suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration.	Immediately
	<u>AND</u>	

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.2.3 Initiate actions to restore required AC and DC electrical power distribution trains, and AC vital electrical power distribution subsystems to OPERABLE status.	Immediately
	<u>AND</u>	
	A.2.4 Declare associated required residual heat removal subsystem(s) inoperable and not in operation.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.10.1	Verify correct breaker alignments and voltage to required AC and DC electrical power distribution trains, and AC vital electrical power distribution subsystems.	In accordance with the Surveillance Frequency Control Program

3.9 REFUELING OPERATIONS

3.9.1 Boron Concentration

LCO 3.9.1 Boron concentrations of the Reactor Coolant System (RCS), the refueling canal, and the refueling cavity shall be maintained within the limit specified in the COLR.

APPLICABILITY: MODE 6.

--NOTE--
Only applicable to the refueling canal and refueling cavity when connected to the RCS.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Boron concentration not within limit.	A.1 Suspend positive reactivity additions. AND A.2 Initiate action to restore boron concentration to within limit.	Immediately Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.9.1.1	Verify boron concentration is within the limit specified in the COLR.	In accordance with the Surveillance Frequency Control Program

3.9 REFUELING OPERATIONS

3.9.2 Refueling Cavity Water Level

LCO 3.9.2 Refueling cavity water level shall be maintained ≥ 23 ft above the top of reactor vessel flange.

APPLICABILITY: During movement of irradiated fuel assemblies within containment.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Refueling cavity water level not within limit.	A.1 Suspend movement of irradiated fuel assemblies within containment.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.9.2.1	Verify refueling cavity water level is ≥ 23 ft above the top of reactor vessel flange.	In accordance with the Surveillance Frequency Control Program

3.9 REFUELING OPERATIONS

3.9.3 Nuclear Instrumentation

LCO 3.9.3 Two source range neutron flux monitors shall be OPERABLE.

AND

One source range audible alarm circuit shall be OPERABLE.

APPLICABILITY: MODE 6.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One required source range neutron flux monitor inoperable.	A.1	Suspend positive reactivity additions.	Immediately
	AND		
	A.2	------------ NOTE ------------- Fuel assemblies, sources, and reactivity control components may be moved if necessary to restore an inoperable source range neutron flux monitor or to complete movement of a component to a safe condition. ----------------------------------	
		Suspend movement of fuel, sources, and reactivity control components within the reactor vessel.	Immediately

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
B. Two required source range neutron flux monitors inoperable.	B.1	Initiate action to restore one source range neutron flux monitor to OPERABLE status.	Immediately
	<u>AND</u>		
	B.2	Perform SR 3.9.1.1.	Once per 12 hours
C. Required source range audible alarm circuit inoperable.	C.1	Initiate action to isolate unborated water sources.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.9.3.1	Perform CHANNEL CHECK.	In accordance with the Surveillance Frequency Control Program
SR 3.9.3.2	Perform COT.	In accordance with the Surveillance Frequency Control Program

3.9 REFUELING OPERATIONS

3.9.4 Containment Penetrations

LCO 3.9.4 The containment penetrations shall be in the following status:

a. The equipment hatch is closed and held in place by four bolts,

b. One door in each air lock is capable of being closed, and

c. Each penetration providing direct access from the containment atmosphere to the outside atmosphere is either:

   1. Closed by a manual or automatic isolation valve, blind flange, or equivalent or

   2. Capable of being closed by an OPERABLE Containment Ventilation Isolation System.

--NOTE--
Penetration flow path(s) providing direct access from the containment atmosphere to the outside atmosphere may be unisolated under administrative controls.

APPLICABILITY: During movement of recently irradiated fuel assemblies within containment.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One or more containment penetrations not in required status.	A.1	Suspend movement of recently irradiated fuel assemblies within containment.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.9.4.1	Verify each required containment penetration is in the required status.	In accordance with the Surveillance Frequency Control Program
SR 3.9.4.2	-------------------------------NOTE------------------------------ Not required to be met for containment ventilation isolation valve(s) in penetrations closed to comply with LCO 3.9.4.c.1. -- Verify each required containment ventilation isolation valve actuates to the isolation position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program

3.9 REFUELING OPERATIONS

3.9.5 Residual Heat Removal (RHR) and Coolant Circulation - High Water Level

LCO 3.9.5 One RHR loop shall be OPERABLE and in operation.

--NOTE--
The required RHR loop may be removed from operation for ≤ 1 hour per 8 hour period, provided no operations are permitted that would cause introduction of coolant into the Reactor Coolant System with boron concentration less than that required to meet the minimum required boron concentration of LCO 3.9.1.

APPLICABILITY: MODE 6 with the water level ≥ 23 ft above the top of reactor vessel flange.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. RHR loop requirements not met.	A.1	Suspend operations that would cause introduction of coolant into the RCS with boron concentration less than required to meet the boron concentration of LCO 3.9.1.	Immediately
	AND		
	A.2	Suspend loading irradiated fuel assemblies in the core.	Immediately
	AND		
	A.3	Initiate action to satisfy RHR loop requirements.	Immediately
	AND		

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. (continued)	A.4	Close equipment hatch and secure with four bolts.	4 hours
	AND		
	A.5	Close one door in each air lock.	4 hours
	AND		
	A.6.1	Close each penetration providing direct access from the containment atmosphere to the outside atmosphere with a manual or automatic isolation valve, blind flange, or equivalent.	4 hours
	OR		
	A.6.2	Verify each penetration is capable of being closed by an OPERABLE Containment Ventilation Isolation System.	4 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.9.5.1	Verify one RHR loop is in operation and circulating reactor coolant at a flow rate of ≥ 3000 gpm.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.9.5.2	Verify required RHR loop locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program

3.9 REFUELING OPERATIONS

3.9.6 Residual Heat Removal (RHR) and Coolant Circulation - Low Water Level

LCO 3.9.6 Two RHR loops shall be OPERABLE, and one RHR loop shall be in operation.

---NOTES--

1. All RHR pumps may be removed from operation for ≤ 15 minutes when switching from one train to another provided:

   a. The core outlet temperature is maintained > 10 degrees F below saturation temperature,

   b. No operations are permitted that would cause introduction of coolant into the Reactor Coolant System (RCS) with boron concentration less than that required to meet the minimum required boron concentration of LCO 3.9.1, and

   c. No draining operations to further reduce RCS water volume are permitted.

2. One required RHR loop may be inoperable for up to 2 hours for surveillance testing, provided that the other RHR loop is OPERABLE and in operation.

APPLICABILITY: MODE 6 with the water level < 23 ft above the top of reactor vessel flange.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Less than the required number of RHR loops OPERABLE.	A.1 Initiate action to restore required RHR loops to OPERABLE status.	Immediately
	<u>OR</u>	
	A.2 Initiate action to establish ≥ 23 ft of water above the top of reactor vessel flange.	Immediately

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
B. No RHR loop in operation.	B.1	Suspend operations that would cause introduction of coolant into the RCS with boron concentration less than required to meet the boron concentration of LCO 3.9.1.	Immediately
	<u>AND</u>		
	B.2	Initiate action to restore one RHR loop to operation.	Immediately
	<u>AND</u>		
	B.3	Close equipment hatch and secure with four bolts.	4 hours
	<u>AND</u>		
	B.4	Close one door in each air lock.	4 hours
	<u>AND</u>		
	B.5.1	Close each penetration providing direct access from the containment atmosphere to the outside atmosphere with a manual or automatic isolation valve, blind flange, or equivalent.	4 hours
	<u>OR</u>		

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.5.2 Verify each penetration is capable of being closed by an OPERABLE Containment Ventilation Isolation System.	4 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.9.6.1	Verify one RHR loop is in operation and circulating reactor coolant at a flow rate of ≥ 3000 gpm.	In accordance with the Surveillance Frequency Control Program
SR 3.9.6.2	Verify correct breaker alignment and indicated power available to the required RHR pump that is not in operation.	In accordance with the Surveillance Frequency Control Program
SR 3.9.6.3	Verify RHR loop locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program

4.0 DESIGN FEATURES

4.1 Site Location

The site is approximately 25 miles south of Miami, 8 miles east of Florida City and 9 miles southeast of Homestead, Florida.

4.2 Reactor Core

4.2.1 Fuel Assemblies

The reactor shall contain 157 fuel assemblies. Each assembly shall consist of a matrix of Zircaloy-4, ZIRLO®, or Optimized ZIRLO™ fuel rods with an initial composition of natural or slightly enriched uranium dioxide (UO_2) as fuel material. Limited substitutions of stainless steel filler rods for fuel rods, or by vacant rod positions, in accordance with approved applications of fuel rod configurations, may be used. Fuel assemblies shall be limited to those fuel designs that have been analyzed with applicable NRC staff approved codes and methods.

4.2.2 Control Rod Assemblies

The reactor core shall contain 45 control rod assemblies. The control material shall be silver indium cadmium, as approved by the NRC.

4.3 Fuel Storage

4.3.1 Criticality

4.3.1.1 The spent fuel storage racks are designed and shall be maintained with:

a. Fuel assemblies having a maximum U-235 enrichment of 5.0 weight percent,

b. $k_{eff} \leq 0.95$ if fully flooded with water borated to 500 ppm, which includes an allowance for biases and uncertainties as described in Section 9.5 of the UFSAR,

c. $k_{eff} \leq 1.0$ if fully flooded with unborated water, which includes an allowance for biases and uncertainties as described in Section 9.5 of the UFSAR,

d. A nominal 10.6 inch center to center distance between fuel assemblies placed in Region I of the fuel storage racks,

e. A nominal 9.0 inch center to center distance between fuel assemblies placed in Region II of the fuel storage racks,

4.0 DESIGN FEATURES

4.3 Fuel Storage (continued)

f. A nominal 10.1 inch center to center distance in the east-west direction and a nominal 10.7 inch center to center distance in the north-south direction for the cask area storage rack,

4.3.1.2 The new fuel storage racks are designed and shall be maintained with:

a. Fuel assemblies having a maximum U-235 enrichment of 4.5 weight percent if the assemblies contain no burnable adsorber rods,

b. Fuel assemblies having a maximum U-235 enrichment of 5.0 weight percent if the assemblies contain at least 16 integral fuel burnable adsorber rods.

c. A nominal 21 inch center to center distance between fuel assemblies placed in the storage racks to assure $k_{eff} \leq 0.98$ for optimum moderation conditions, and

d. A nominal 21 inch center to center distance between fuel assemblies placed in the storage racks to assure $k_{eff} \leq 0.95$ for fully flooded conditions.

4.3.2 Drainage

The spent fuel storage pool is designed and shall be maintained to prevent inadvertent draining of the pool below a level of 6 feet above the fuel assemblies in the storage racks.

4.3.3 Capacity

The spent fuel storage pool is designed and shall be maintained with a storage capacity limited to no more than 1535 fuel assemblies.

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

5.1.1 The plant manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

The plant manager or his designee shall approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that affect nuclear safety.

5.1.2 The shift manager (SM) shall be responsible for the control room command function. During any absence of the SM from the control room while either unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the SM from the control room while both units are in MODE 5 or 6, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting safety of the nuclear power plant.

a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications shall be documented in the Quality Assurance Topical Report or Updated Final Safety Analysis Report,

b. The plant manager shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant,

c. A specified corporate officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety, and

d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

5.2.2 Unit Staff

The unit staff organization shall include the following:

a. A total of three non-licensed operators shall be assigned to the units at all times with one non-licensed operator assigned to each reactor.

b. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a and 5.2.2.e for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

5.2 Organization

5.2.2 Unit Staff (continued)

c. A radiation protection technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

d. The operations manager or assistant operations manager shall hold an SRO license.

e. An individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971, except for the radiation protection manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. The staff not covered by ANSI N18.1-1971 shall meet or exceed the minimum qualifications of Regulations, Regulatory Guides, or ANSI Standards acceptable to NRC staff.

5.3.2 For the purpose of 10 CFR 55.4, a licensed senior reactor operator (SRO) and a licensed reactor operator (RO) are those individuals who, in addition to meeting the requirements of Specification 5.3.1, perform the functions described in 10 CFR 50.54(m).

5.0 ADMINISTRATIVE CONTROLS

5.4 Procedures

5.4.1 Written procedures shall be established, implemented, and maintained covering the following activities:

a. The applicable procedures required by the Quality Assurance Topical Report,

b. The emergency operating procedures required to implement the requirements of NUREG-0737 and to NUREG-0737, Supplement 1, as stated in Generic Letter 82-33,

c. Quality assurance for effluent and environmental monitoring, and

d. All programs specified in Specification 5.5.

5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

The following programs shall be established, implemented, and maintained.

5.5.1 Offsite Dose Calculation Manual (ODCM)

a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program, and

b. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating, and Radioactive Effluent Release Reports required by Specification 5.6.1 and Specification 5.6.2.

Licensee initiated changes to the ODCM:

a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:

   1. Sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s) and

   2. A determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations,

b. Shall become effective after the approval of the plant manager, and

c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.5 Programs and Manuals

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include Containment Spray, Safety Injection, and Chemical and Volume Control Systems. The program shall include the following:

a. Preventive maintenance and periodic visual inspection requirements and

b. Integrated leak test requirements for each system in accordance with the Surveillance Frequency Control Program.

The provisions of SR 3.0.2 are applicable.

5.5.3 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM,

b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to ten times the concentration values in Appendix B, Table 2, Column 2 to 10 CFR 20.1001-20.2402,

c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM,

d. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from each unit to unrestricted areas, conforming to 10 CFR 50, Appendix I,

e. Determination of cumulative dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days. Determination of projected dose contributions from radioactive effluents in accordance with the methodology in the ODCM at least every 31 days,

5.5 Programs and Manuals

5.5.3 Radioactive Effluent Controls Program (continued)

f. Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of 31 days would exceed 2% of the guidelines for the annual dose or dose commitment, conforming to 10 CFR 50, Appendix I,

g. Limitations on the dose rate resulting from radioactive material released in gaseous effluents from the site to areas at or beyond the site boundary shall be in accordance with the following:

1. For noble gases: a dose rate ≤ 500 mrem/yr to the whole body and a dose rate ≤ 3000 mrem/yr to the skin and

2. For iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days: a dose rate ≤ 1500 mrem/yr to any organ,

h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I,

i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I, and

j. Limitations on the annual dose or dose commitment to any member of the public, beyond the site boundary, due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluent Controls Program surveillance frequency.

5.5.4 Pre-Stressed Concrete Containment Tendon Surveillance Program

This program provides controls for monitoring any tendon degradation in pre-stressed concrete containments, including effectiveness of its corrosion protection medium, to ensure containment structural integrity. The program shall include baseline measurements prior to initial operations. The Tendon Surveillance Program, inspection frequencies, and acceptance criteria shall be in accordance with Section XI, Subsection IWL of the ASME Boiler and Pressure Vessel Code and applicable addenda as required by 10 CFR 50.55a, except where an alternative, exemption, or relief has been authorized by the NRC.

The provisions of SR 3.0.3 are applicable to the Tendon Surveillance Program inspection frequencies.

5.5 Programs and Manuals

5.5.5 Reactor Coolant Pump (RCP) Flywheel Inspection Program

This program shall provide for the inspection of each RCP flywheel at least once every 20 years by either conducting an in-place ultrasonic examination over the volume from the inner bore of the flywheel to the circle of one-half the outer radius, or by conducting a surface examination (magnetic particle and/or liquid penetrant) of exposed surfaces of the disassembled flywheel.

5.5.6 Steam Generator (SG) Program

An SG Program shall be established and implemented to ensure that SG tube integrity is maintained. In addition, the SG Program shall include the following:

a. Provisions for condition monitoring assessments. Condition monitoring assessment means an evaluation of the “as found” condition of the tubing with respect to the performance criteria for structural integrity and accident induced leakage. The "as found" condition refers to the condition of the tubing during an SG inspection outage, as determined from the inservice inspection results or by other means, prior to the plugging of tubes. Condition monitoring assessments shall be conducted during each outage during which the SG tubes are inspected or plugged to confirm that the performance criteria are being met.

b. Performance criteria for SG tube integrity. SG tube integrity shall be maintained by meeting the performance criteria for tube structural integrity, accident induced leakage, and operational LEAKAGE.

    1. Structural integrity performance criterion: All in-service SG tubes shall retain structural integrity over the full range of normal operating conditions (including startup, operation in the power range, hot standby, and cool down), all anticipated transients included in the design specification and design basis accidents. This includes retaining a safety factor of 3.0 against burst under normal steady state full power operation primary-to-secondary pressure differential and a safety factor of 1.4 against burst applied to the design basis accident primary-to-secondary pressure differentials. Apart from the above requirements, additional loading conditions associated with the design basis accidents, or combination of accidents in accordance with the design and licensing basis, shall also be evaluated to determine if the associated loads contribute significantly to burst or collapse. In the assessment of tube integrity, those loads that do significantly affect burst or collapse shall be determined and assessed in combination with the loads due to pressure with a safety factor of 1.2 on the combined primary loads and 1.0 on axial secondary loads.

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5.5.6 Steam Generator (SG) Program (continued)

2. Accident induced leakage performance criterion: The primary to secondary accident induced leakage rate for any design basis accident, other than a SG tube rupture, shall not exceed the leakage rate assumed in the accident analysis in terms of total leakage rate for all SGs and leakage rate for an individual SG. Leakage is not to exceed 0.60 gpm total through all SGs and 0.20 gpm through any one SG at room temperature conditions.

3. The operational LEAKAGE performance criterion is specified in LCO 3.4.13, "RCS Operational LEAKAGE."

c. Provisions for SG tube plugging criteria. Tubes found by inservice inspection to contain flaws with a depth equal to or exceeding 40% of the nominal tube wall thickness shall be plugged.

The following alternate tube plugging criteria may be applied as an alternative to the 40% depth based criteria:

1. Tubes with service-induced flaws located greater than 18.11 inches below the top of the tubesheet do not require plugging. Tubes with service-induced flaws located in the portion of the tube from the top of the tubesheet to 18.11 inches below the top of the tubesheet shall be plugged upon detection.

d. Provisions for SG tube inspections. Periodic SG tube inspections shall be performed. The number and portions of the tubes inspected and methods of inspection shall be performed with the objective of detecting flaws of any type (e.g., volumetric flaws, axial and circumferential cracks) that may be present along the length of the tube, from the tube-to-tubesheet weld at the tube inlet to the tube-to-tubesheet weld at the tube outlet except for any portions of the tube that are exempt from inspection by alternate repair criteria, and that may satisfy the applicable tube plugging criteria. The tube-to-tubesheet weld is not part of the tube. In addition to meeting the requirements of d.1, d.2, and d.3 below, the inspection scope, inspection methods, and inspection intervals shall be such as to ensure that SG tube integrity is maintained until the next SG inspection. A degradation assessment shall be performed to determine the type and location of flaws to which the tubes may be susceptible and, based on this assessment, to determine which inspection methods need to be employed and at what locations.

1. Inspect 100% of the tubes in each SG during the first refueling outage following SG installation.

5.5 Programs and Manuals

5.5.6 Steam Generator (SG) Program (continued)

2. After the first refueling outage following SG installation, inspect 100% of the tubes in each SG at least every 54 effective full power months, which defines the inspection period. If none of the SG tubes have ever experienced cracking other than in regions that are exempt from inspection by alternate repair criteria and the SG inspection was performed with enhanced probes, the inspection period may be extended to 72 effective full power months. Enhanced probes have a capability to detect flaws of any type equivalent to or better than array probe technology. The enhanced probes shall be used from the tube-to-tubesheet weld at the tube inlet to the tube-to-tubesheet weld at the tube outlet except any portions of the tube that are exempt from inspection by alternate repair criteria. If there are regions where enhanced probes cannot be used, the tube inspection techniques shall be capable of detecting all forms of existing and potential degradation in that region.

3. If crack indications are found in any SG tube excluding any region that is exempt from inspection by alternate repair criteria, then the next inspection for each affected and potentially affected SG for the degradation mechanism that caused the crack indication shall be at the next refueling outage, but may be deferred to the following outage if the 100% inspection of all SGs was performed with enhanced probes as described in paragraph d.2. If definitive information, such as from examination of a pulled tube, diagnostic non-destructive testing, or engineering evaluation indicates that a crack-like indication is not associated with a crack(s), then the indication need not be treated as a crack.

e. Provisions for monitoring operational primary to secondary LEAKAGE.

5.5.7 Secondary Water Chemistry Program

This program provides controls for monitoring secondary water chemistry to inhibit SG tube degradation. The program shall include:

a. Identification of a sampling schedule for the critical variables and control points for these variables,

b. Identification of the procedures used to measure the values of the critical variables,

c. Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser in leakage,

d. Procedures for the recording and management of data,

5.5 Programs and Manuals

5.5.7 Secondary Water Chemistry Program (continued)

e. Procedures defining corrective actions for all off control point chemistry conditions, and

f. A procedure identifying the authority responsible for the interpretation of the data and the sequence and timing of administrative events, which is required to initiate corrective action.

5.5.8 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of filter ventilation systems at a Frequency in accordance with the Surveillance Frequency Control Program and 1) after 720 hours of system operation, or 2) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or 3) following exposure of the filters to effluents from painting, fire, or chemical release in any ventilation zone communicating with the system that may have an adverse effect on the functional capability of the system, or 4) after complete or partial replacement of a filter bank, and in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2 and ASTM D3803-1989.

a. Demonstrate for ventilation systems that an inplace test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass < 0.05% when tested at the system flowrate specified below ± 10%.

Ventilation System	Flowrate
Control Room Emergency Ventilation System	1000 cfm

b. Demonstrate for ventilation systems that an inplace test of the charcoal adsorber shows a penetration and system bypass < 1% when tested in accordance with ASTM D3803-1989 at the system flowrate specified below ± 10%.

Ventilation System	Flowrate
Control Room Emergency Ventilation System	1000 cfm

c. Demonstrate for Control Room Emergency Ventilation System that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, shows the methyl iodide penetration less than 2.5% when tested in accordance with ASTM D3803-1989 at a temperature of 30°C (86°F) and the relative humidity of 95%.

5.5 Programs and Manuals

5.5.8 Ventilation Filter Testing Program (VFTP) (continued)

d. Demonstrate for ventilation systems that the pressure drop across the combined HEPA filters and the charcoal adsorbers is less than the value specified below when tested at the system flowrate specified below ± 10%.

Ventilation System	Delta P	Flowrate
Control Room Emergency Ventilation System	6" w.g	1000 cfm

e. Verify by a visual inspection the absence of foreign materials and gasket deterioration.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP test frequencies.

5.5.9 Gas Decay Tank Explosive Gas and Radioactivity Monitoring Program

This program provides controls for potentially explosive gas mixtures and the quantity of radioactivity contained in the gas decay tanks. The gaseous radioactivity quantities shall be determined following the methodology in Branch Technical Position (BTP) ETSB 11-5, "Postulated Radioactive Release due to Waste Gas System Leak or Failure."

The program shall include:

a. The limits for concentrations of hydrogen and oxygen in the gas decay tanks and a surveillance program to ensure the limits are maintained. Such limits shall be appropriate to the system's design criteria (i.e., whether or not the system is designed to withstand a hydrogen explosion) and

b. A surveillance program to ensure that the quantity of radioactivity contained in the gas decay tank is less than the amount that would result in a whole body exposure of ≥ 0.5 rem to any individual in an unrestricted area, in the event of an uncontrolled release of the tanks' contents.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Gas Decay Tank Explosive Gas and Radioactivity Monitoring Program surveillance frequencies.

5.5 Programs and Manuals

5.5.10 Diesel Fuel Oil Testing Program

A diesel fuel oil testing program to implement required testing of both new fuel oil and stored fuel oil shall be established. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM Standards. The purpose of the program is to establish the following:

a. Acceptability of new fuel oil for use prior to addition to storage tanks by determining that the fuel oil has:

   1. An API gravity or an absolute specific gravity within limits,

   2. A flash point and kinematic viscosity within limits for ASTM 2D fuel oil, and

   3. A clear and bright appearance with proper color or a water and sediment content within limits.

b. Within 30 days following addition of the new fuel oil to storage tanks, verify that the properties of the new fuel oil, other than those addressed in a., above, are within limits for ASTM 2D fuel oil, and

c. Total particulate concentration of the fuel oil is ≤ 10 mg/l when tested in accordance with the Surveillance Frequency Control Program.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Diesel Fuel Oil Testing Program test frequencies.

5.5.11 Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.

b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:

   1. A change in the TS incorporated in the license or

   2. A change to the updated UFSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.

c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR.

5.5 Programs and Manuals

5.5.11 Technical Specifications (TS) Bases Control Program (continued)

d. Proposed changes that meet the criteria of Specification 5.5.11b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).

5.5.12 Safety Function Determination Program (SFDP)

This program ensures loss of safety function is detected and appropriate actions taken. Upon entry into LCO 3.0.6, an evaluation shall be made to determine if loss of safety function exists. Additionally, other appropriate limitations and remedial or compensatory actions may be identified to be taken as a result of the support system inoperability and corresponding exception to entering supported system Condition and Required Actions. This program implements the requirements of LCO 3.0.6. The SFDP shall contain the following:

a. Provisions for cross train checks to ensure a loss of the capability to perform the safety function assumed in the accident analysis does not go undetected,

b. Provisions for ensuring the plant is maintained in a safe condition if a loss of function condition exists,

c. Provisions to ensure that an inoperable supported system's Completion Time is not inappropriately extended as a result of multiple support system inoperabilities, and

d. Other appropriate limitations and remedial or compensatory actions.

A loss of safety function exists when, assuming no concurrent single failure, no concurrent loss of offsite power, or no concurrent loss of onsite diesel generator(s), a safety function assumed in the accident analysis cannot be performed. For the purpose of this program, a loss of safety function may exist when a support system is inoperable, and:

a. A required system redundant to the system(s) supported by the inoperable support system is also inoperable, or

b. A required system redundant to the system(s) in turn supported by the inoperable supported system is also inoperable, or

c. A required system redundant to the support system(s) for the supported systems (a) and (b) above is also inoperable.

5.5 Programs and Manuals

5.5.12. Safety Function Determination Program (SFDP) (continued)

The SFDP identifies where a loss of safety function exists. If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered. When a loss of safety function is caused by the inoperability of a single Technical Specification support system, the appropriate Conditions and Required Actions to enter are those of the support system.

5.5.13 Containment Leakage Rate Testing Program

a. A program shall establish the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with Nuclear Energy Institute (NEI) 94-01, Revision 3-A, "Industry Guidance for Implementing Performance Based Options of 10 CFR 50 Appendix J," and the conditions and limitations specified in NEI 94-01, Revision 2-A, with the following deviations or exceptions:

   1. A vacuum test may be performed in lieu of a pressure test for airlock door seals.

b. The calculated peak containment internal pressure for the design basis loss of coolant accident, P_a, is defined here as the containment design pressure of 55 psig.

c. The maximum allowable containment leakage rate, L_a, at P_a, shall be 0.20% of containment air weight per day.

d. Leakage rate acceptance criteria are:

   1. Containment leakage rate acceptance criterion is 1.0 L_a. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $< 0.60\ L_a$ for the Type B and C tests and $\leq 0.75\ L_a$, for Type A tests.

   2. Overall air lock leakage rate acceptance criterion is $\leq 0.05\ L_a$, when tested at $\geq P_a$.

e. The provisions of SR 3.0.3 are applicable to the Containment Leakage Rate Testing Program.

f. Nothing in these Technical Specifications shall be construed to modify the testing Frequencies required by 10 CFR 50, Appendix J.

5.5 Programs and Manuals

5.5.14 Battery Monitoring and Maintenance Program

This program provides controls for battery restoration and maintenance. The program shall be in accordance with IEEE Standard (Std) 450-2010, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Vented Lead-Acid Batteries for Stationary Applications," as endorsed by Regulatory Guide 1.129, Revision 3 (RG), and program provisions as identified below:

a. Actions to restore battery cells with float voltage < 2.13 V;

b. Actions to determine whether the float voltage of the remaining battery cells is ≥ 2.13 V when the float voltage of a battery cell has been found to be < 2.13 V;

c. Actions to equalize and test battery cells that had been discovered with electrolyte level below the top of the plates; and

d. Limits on average electrolyte temperature, battery connection resistance, and battery terminal voltage.

5.5.15 Control Room Envelope (CRE) Habitability Program

A Control Room Envelope (CRE) Habitability Program shall be established and implemented to ensure that CRE habitability is maintained such that, with an OPERABLE Control Room Emergency Ventilation System (CREVS), CRE occupants can control the reactor safely under normal conditions and maintain it in a safe condition following a radiological event, hazardous chemical release, or a smoke challenge. The program shall ensure that adequate radiation protection is provided to permit access and occupancy of the CRE under design basis accident (DBA) conditions without personnel receiving radiation exposures in excess of 5 rem total effective dose equivalent (TEDE) for the duration of the accident. The program shall include the following elements:

a. The definition of the CRE and the CRE boundary.

b. Requirements for maintaining the CRE boundary in its design condition including configuration control and preventive maintenance.

c. Requirements for (i) determining the unfiltered air inleakage past the CRE boundary into the CRE in accordance with the testing methods and at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Revision 0, May 2003, and (ii) assessing CRE habitability at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, Revision 0.

5.5 Programs and Manuals

5.5.15 Control Room Envelope (CRE) Habitability Program (continued)

d. Measurement, at designated locations, of the CRE pressure relative to all external areas adjacent to the CRE boundary during the pressurization mode of operation with one CREVS train operating at the flow rate required by the VFTP, at a Frequency in accordance with the Surveillance Frequency Control Program. The results shall be trended and used as part of the assessment of the CRE boundary.

e. The quantitative limits on unfiltered air inleakage into the CRE. These limits shall be stated in a manner to allow direct comparison to the unfiltered air inleakage measured by the testing described in paragraph c. The unfiltered air inleakage limit for radiological challenges is the inleakage flow rate assumed in the licensing basis analyses of DBA consequences. Unfiltered air inleakage limits for hazardous chemicals must ensure that exposure of CRE occupants to these hazards will be within the assumptions in the licensing basis.

f. The provisions of SR 3.0.2 are applicable to the Frequencies for assessing CRE habitability, determining CRE unfiltered inleakage, and measuring CRE pressure and assessing the CRE boundary as required by paragraphs c and d, respectively.

5.5.16 Surveillance Frequency Control Program

The program shall ensure that Surveillance Requirements specified in the Technical Specifications are performed at intervals sufficient to assure the associated Limiting Conditions for Operation are met.

a. The Surveillance Frequency Control Program shall contain a list of Frequencies of those Surveillance Requirements for which the Frequency is controlled by the program.

b. Changes to the Frequencies listed in the Surveillance Frequency Control Program shall be made in accordance with NEI 04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1.

c. The provisions of Surveillance Requirements 3.0.2 and 3.0.3 are applicable to the Frequencies established in the Surveillance Frequency Control Program.

5.5 Programs and Manuals

5.5.17 Risk Informed Completion Time Program

This program provides controls to calculate a Risk Informed Completion Time (RICT) and must be implemented in accordance with NEI 06-09-A, Revision 0, "Risk-Managed Technical Specifications (RMTS) Guidelines." The program shall include the following:

a. The RICT may not exceed 30 days;

b. A RICT may only be utilized in MODES 1 and 2;

c. When a RICT is being used, any change to the plant configuration within the scope of the Risk Informed Completion Time Program must be considered for the effect on the RICT.

    1. For planned changes, the revised RICT must be determined prior to implementation of the change in configuration.

    2. For emergent conditions, the revised RICT must be determined within the time limits of the Required Action Completion Time (i.e., not the RICT) or 12 hours after the plant configuration change, whichever is less.

    3. Revising the RICT is not required if the plant configuration change would lower plant risk and would result in a longer RICT.

d. For emergent conditions, if the extent of condition evaluation for inoperable structures, systems, or components (SSCs) is not complete prior to exceeding the Completion Time, the RICT shall account for the increased possibility of common cause failure (CCF) by either:

    1. Numerically accounting for the increased possibility of CCF in the RICT calculation; or

    2. Risk Management Actions (RMAs) not already credited in the RICT calculation shall be implemented that support redundant or diverse SSCs that perform the function(s) of the inoperable SSCs, and, if practicable, reduce the frequency of initiating events that challenge the function(s) performed by the inoperable SSCs.

e. Use of a RICT is not permitted for entry into a configuration which represents a loss of a specified safety function or inoperability of all required trains of a system required to be OPERABLE.

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 Annual Radiological Environmental Operating Report

---NOTE---
A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.2 Radioactive Effluent Release Report

---NOTE---
A single submittal may be made for a multiple unit station. The submittal shall combine sections common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

The Radioactive Effluent Release Report covering the operation of the unit shall be submitted in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

5.6 Reporting Requirements

5.6.3 CORE OPERATING LIMITS REPORT

a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:

1. TS 2.1.1, Reactor Core SLs
2. LCO 3.1.1, SHUTDOWN MARGIN (SDM)
3. LCO 3.1.3, Moderator Temperature Coefficient (MTC)
4. LCO 3.1.5, Shutdown Bank Insertion Limit
5. LCO 3.1.6, Control Bank Insertion Limits
6. LCO 3.1.7, Rod Position Indication
7. LCO 3.2.1, Heat Flux Hot Channel Factor ($F_Q(Z)$)
8. LCO 3.2.2, Nuclear Enthalpy Rise Hot Channel Factor ($F^N_{\Delta H}$)
9. LCO 3.2.3, Axial Flux Difference (AFD)
10. LCO 3.3.1, Overtemperature ΔT, Note 1 of Table 3.3.1-1, determination of values K_1, K_2, K_3, T´, P´, τ_1, τ_2, τ_3, τ_4, τ_5, τ_6, and the breakpoint and slope values for the f_1 (ΔI)
11. LCO 3.3.1, Overpower ΔT, Note 3 of Table 3.3.1-1, determination of values for K_4, K_5, K_6, T”, τ_7 and f_2 (ΔI)
12. LCO 3.4.1, RCS Pressure, Temperature, and Flow Departure from Nucleate Boiling (DNB) Limits

b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:

The analytical methods used to determine the AFD limits shall be those previously reviewed and approved by the NRC in:

1. WCAP-10216-P-A, "RELAXATION OF CONSTANT AXIAL OFFSET CONTROL F_Q SURVEILLANCE TECHNICAL SPECIFICATION," June 1983.

2. WCAP-8385, "POWER DISTRIBUTION CONTROL AND LOAD FOLLOWING PROCEDURES - TOPICAL REPORT," September 1974.

The analytical methods used to determine F_Q (Z), FΔH and the K(Z) curve shall be those previously reviewed and approved by the NRC in:

5.6 Reporting Requirements

5.6.3 CORE OPERATING LIMITS REPORT (continued)

---NOTES---

1. References 1 through 6 only applicable to Unit 3 through Core Operating Cycle 32 and Unit 4 through Core Operating Cycle 33.

2. Reference 9 not applicable to Unit 3 until Core Operating Cycle 33 and Unit 4 until Core Operating Cycle 34.

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1. WCAP-9220-P-A, Rev. 1, "Westinghouse ECCS Evaluation Model - 1981 Version," February 1982.

2. WCAP-10054-P-A, (proprietary), "Westinghouse Small Break ECCS Evaluation Model Using the NOTRUMP Code," August 1985.

3. WCAP-10054-P-A, Addendum 2, Revision 1 (proprietary), "Addendum to the Westinghouse Small Break ECCS Evaluation Model Using the NOTRUMP Code: Safety Injection into the Broken Loop and COSI Condensation Model," July 1997.

4. WCAP-16009-P-A, "Realistic Large-break LOCA Evaluation Methodology Using the Automated Statistical Treatment of Uncertainty Method (ASTRUM)", January 2005.

5. USNRC Safety Evaluation Report, Letter from R. C. Jones (USNRC) to N. J. Liparulo (W), "Acceptance for Referencing of the Topical Report WCAP-12945(P) 'Westinghouse Code Qualification Document for Best Estimate Loss of Coolant Analysis,'" June 28, 1996 (as evaluated in NRC Safety Evaluation dated December 20, 1997).

6. Letter dated June 13, 1996, from N. J. Liparulo (W) to Frank R. Orr (USNRC), "Re-Analysis Work Plans Using Final Best Estimate Methodology," (as evaluated in NRC Safety Evaluation dated December 20, 1997).

7. WCAP-12610-P-A, "VANTAGE+ Fuel Assembly Reference Core Report," S. L. Davidson and T. L. Ryan, April 1995.

8. WCAP-12610-P-A & CENPD-404-P-A, Addendum 1-A, "Optimized ZIRLO™," July 2006.

9. WCAP-16996-P-A, Revision 1, “Realistic LOCA Evaluation Methodology Applied to the Full Spectrum of Break Sizes (FULL SPECTRUM LOCA Methodology),” November 2016.

5.6 Reporting Requirements

5.6.3 CORE OPERATING LIMITS REPORT (continued)

The analytical methods used to determine Overtemperature ΔT and Overpower ΔT shall be those previously reviewed and approved by the NRC in:

1. WCAP-8745-P-A, "Design Basis for the Thermal Overtemperature ΔT and Overpower ΔT Trip Functions," September 1986.

2. WCAP-9272-P-A, "Westinghouse Reload Safety Evaluation Methodology," July 1985.

The analytical methods used to determine Safety Limits, Shutdown Margin, Moderator Temperature Coefficient, DNB Parameters, Rod Bank Insertion Limits and the All Rods Out position shall be those previously reviewed and approved by the NRC in:

1. WCAP-9272-P-A, "Westinghouse Reload Safety Evaluation Methodology," July 1985.

The analytical methods used to support the suspension of the measurement of the Moderator Temperature Coefficient in accordance with Surveillance Requirement (SR) 3.1.3.2 shall be those previously reviewed and approved by the NRC in:

1. WCAP-13749-P-A, "Safety Evaluation Supporting the Conditional Exemption of the Most Negative EOL Moderator Temperature Coefficient Measurement," March 1997.

2. WCAP-11596-P-A, "Qualification of the Phoenix-P/ANC Nuclear Design System for Pressurized Water Reactor Cores," June 1988.

3. WCAP-16045-P-A, "Qualification of the Two-Dimensional Transport Code PARAGON," August 2004.

4. WCAP-16045-P-A, Addendum 1-A, "Qualification of the NEXUS Nuclear Data Methodology," August 2007

The ability to calculate the COLR nuclear design parameters are demonstrated in:

1. Florida Power & Light Company Topical Report NF-TR-95-01, "Nuclear Physics Methodology for Reload Design of Turkey Point & St. Lucie Nuclear Plants."

5.6 Reporting Requirements

5.6.3 CORE OPERATING LIMITS REPORT (continued)

Topical Report NF-TR-95-01 was approved by the NRC for use by Florida Power & Light Company in:

1. Safety Evaluation by the Office of Nuclear Reactor Regulations Related to Amendment No. 174 to Facility Operating License DPR-31 and Amendment No. 168 to Facility Operating License DPR-41, Florida Power & Light Company Turkey Point Units 3 and 4, Docket Nos. 50-250 and 50-251.

c. The core operating limits shall be determined such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems (ECCS) limits, nuclear limits such as SDM, transient analysis limits, and accident analysis limits) of the safety analysis are met.

d. The COLR, including any midcycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC.

5.6.4 Post Accident Monitoring Report

When a report is required by Condition B or F of LCO 3.3.3, "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

5.6.5 Steam Generator Tube Inspection Report

A report shall be submitted within 180 days after the initial entry into MODE 4 following completion of an inspection performed in accordance with the Specification 5.5.6, "Steam Generator (SG) Program." The report shall include:

a. The scope of inspections performed on each SG;

b. The nondestructive examination techniques utilized for tubes with increased degradation susceptibility;

c. For each degradation mechanism found:

   1. The nondestructive examination techniques utilized;

   2. The location, orientation (if linear), measured size (if available), and voltage response for each indication. For tube wear at support structures less than 20 percent through-wall, only the total number of indications needs to be reported;

5.6 Reporting Requirements

5.6.5 Steam Generator Tube Inspection Report (continued)

3. A description of the condition monitoring assessment and results, including the margin to the tube integrity performance criteria and comparison with the margin predicted to exist at the inspection by the previous forward-looking tube integrity assessment; and

4. The number of tubes plugged during the inspection outage.

d. An analysis summary of the tube integrity conditions predicted to exist at the next scheduled inspection (the forward-looking tube integrity assessment) relative to the applicable performance criteria, including the analysis methodology, inputs, and results;

e. The number and percentage of tubes plugged to date, and the effective plugging percentage in each SG;

f. The results of any SG secondary side inspections;

g. The primary to secondary leakage rate observed in each SG (if it is not practical to assign the leakage to an individual SG, the entire primary to secondary leakage should be conservatively assumed to be from one SG) during the cycle preceding the inspection which is the subject of the report;

h. The calculated accident induced leakage rate from the portion of the tubes below 18.11 inches from the top of the tubesheet for the most limiting accident in the most limiting SG. In addition, if the calculated accident induced leakage rate from the most limiting accident is less than 1.82 times the maximum operational primary to secondary leakage rate, the report should describe how it was determined; and

i. The results of monitoring for tube axial displacement (slippage). If slippage is discovered, the implications of the discovery and corrective action shall be provided.

5.0 ADMINISTRATIVE CONTROLS

5.7 High Radiation Area

As provided in paragraph 20.1601(c) of 10 CFR Part 20, the following controls shall be applied to high radiation areas in place of the controls required by paragraph 20.1601(a) of 10 CFR Part 20:

5.7.1 High Radiation Areas with Dose Rates Not Exceeding 1.0 rem/hour at 30 Centimeters (12 inches) from the Radiation Source or from any Surface Penetrated by the Radiation

a. Each entryway to such an area shall be barricaded and conspicuously posted as a high radiation area. Such barricades may be opened as necessary to permit entry or exit of personnel or equipment.

b. Access to, and activities in, each such area shall be controlled by means of Radiation Work Permit (RWP) or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.

c. Individuals qualified in radiation protection procedures and personnel continuously escorted by such individuals may be exempted from the requirement for an RWP or equivalent while performing their assigned duties provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.

d. Each individual or group entering such an area shall possess:

1. A radiation monitoring device that continuously displays radiation dose rates in the area, or

2. A radiation monitoring device that continuously integrates the radiation dose rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or

3. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area, or

4. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,

(i) Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or

5.7 High Radiation Area

5.7.1 High Radiation Areas with Dose Rates Not Exceeding 1.0 rem/hour at 30 Centimeters (12 inches) from the Radiation Source or from any Surface Penetrated by the Radiation (continued)

(ii) Be under the surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with individuals in the area who are covered by such surveillance.

e. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.

5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters (12 inches) from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation

a. Each entryway to such an area shall be conspicuously posted as a high radiation area and shall be provided with a locked or continuously guarded door or gate that prevents unauthorized entry, and, in addition:

1. All such door and gate keys shall be maintained under the administrative control of the shift manager, and/or health physics supervision, and

2. Doors and gates shall remain locked except during periods of personnel under an approved RWP or equipment entry or exit.

b. Access to, and activities in, each such area shall be controlled by means of an RWP or equivalent that includes specification of radiation dose rates in the immediate work area(s), maximum allowable stay time and other appropriate radiation protection equipment and measures.

c. Individuals qualified in radiation protection procedures may be exempted from the requirement for an RWP or equivalent while performing radiation surveys in such areas provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.

5.7 High Radiation Area

5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters (12 inches) from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation (continued)

d. Each individual or group entering such an area shall possess:

1. A radiation monitoring device that continuously integrates the radiation rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or

2. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area with the means to communicate with and control every individual in the area, or

3. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,

(i) Be under surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or

(ii) Be under surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, or personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with and control every individual in the area.

4. In those cases where options (2) and (3), above, are impractical or determined to be inconsistent with the "As Low As is Reasonably Achievable" principle, a radiation monitoring device that continuously displays radiation dose rates in the area.

e. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.

5.7 High Radiation Area

5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters (12 inches) from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation (continued)

f. Such individual areas such as containment that are within a larger area where no enclosure exists for the purpose of locking and where no enclosure can reasonably be constructed around the individual area need not be controlled by a locked door or gate, nor continuously guarded, but shall be barricaded, conspicuously posted, and a clearly visible flashing light shall be activated at the area as a warning device.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 297 AND 290

TO SUBSEQUENT RENEWED FACILITY OPERATING LICENSE NOS. DPR-31 AND DPR-41

FLORIDA POWER & LIGHT COMPANY

TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4

DOCKET NOS. 50-250 AND 50-251

1.0 INTRODUCTION

By letter dated September 22, 2021 (Agencywide Documents Access and Management System (ADAMS) ML21265A370), supplemented by letters dated January 19, March 30 and December 2, 2022, and April 4 and May 24, 2023 (ML22019A067, ML22089A195, ML22336A051, ML23095A006 and ML23151A465, respectively), Florida Power and Light Company (FPL, the licensee) requested changes to the technical specifications (TS) for Turkey Point Generating Units Nos. 3 and 4 (Turkey Point). The proposed changes would revise the current technical specifications (CTS) to the improved technical specifications (ITS).

This U.S. Nuclear Regulatory Commission (NRC, the Commission) staff safety evaluation (SE) of the proposed ITS conversion is based on the application, the information provided to the NRC staff through the Turkey Point ITS Conversion Database hosted by Certrec (as docketed by the licensee), and the supplements to the application, as discussed above.

To expedite its review of the application, the NRC staff issued its requests for additional information (RAIs) through the Turkey Point ITS Conversion webpage and the licensee addressed the RAIs by providing responses on the webpage. Entry into the database was protected so that only the licensee and NRC staff reviewers could enter information into the database to add RAIs (NRC) or to provide responses to RAIs (licensee).

To be in compliance with the NRC's regulations for written communications for license amendment requests (LARs), the NRC staff required that the licensee docket its responses to RAIs under oath or affirmation with regards to their accuracy. The majority of the RAI responses were submitted in LAR Supplement 2, dated April 4, 2023. The remaining RAI responses related to ITS sections 3.3 and 3.81 are in LAR Supplement 3, dated May 24, 2023. Thus, the RAI responses and all attachments were submitted as supplemental to the original submittal under oath or affirmation on the licensee's docket.

The supplements listed above provided additional information that clarified and corrected the application, did not expand the scope of the application as originally noticed, and did not change the NRC staff's original proposed no significant hazards consideration determination as published in the *Federal Register* (FR) on June 14, 2022 (87 FR 36003).

2.0 REGULATORY EVALUATION

Section 182a of the Atomic Energy Act of 1954, as amended (the Act), requires, in part, that applicants for nuclear power plant operating licenses provide:

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

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

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

In September 1992, the Commission issued NUREG-1431, Revision 0, "Standard Technical Specifications - Westinghouse Plants," which was developed using the guidance and criteria contained in the Commission's Interim Policy Statement. The ISTS in NUREG-1431 were established as a model for developing the plant-specific ITS for Westinghouse-type plants. The ISTS reflect the results of a detailed review of the application of the Interim Policy Statement criteria, which have been incorporated into 10 CFR 50.36(c)(2)(ii), to generic system functions. The review for retention and relocation of specific TS LCOs, commonly referred to as the "Split Report," is documented in a letter from Thomas E. Murley, NRC, to the nuclear steam supply system vendor owners' groups dated May 9, 1988 (ML11264A057). ISTS also reflect the results of extensive discussions concerning various drafts of ISTS so that the application of the TS criteria and the Writer's Guide would consistently reflect detailed system configurations and operating characteristics for all reactor designs. As such, the generic bases presented in NUREG-1431 provide an abundance of information regarding the extent to which the ISTS present requirements that are necessary to protect the public health and safety.

On July 22, 1993, the Commission issued its "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" (58 FR 39132) (Final Policy Statement), expressing the view that satisfying the guidance in the policy statement also satisfies Section 182a of the Act and 10 CFR 50.36. The Final Policy Statement describes the safety benefits of the ISTS and encouraged licensees to use the ISTS as the basis for plant-specific TS amendments and for complete conversions to plant-specific ITS based on the ISTS. In addition, the Final Policy Statement gives guidance for evaluating the required scope of the TS and defines the guidance criteria to be used in determining which of the LCOs and associated SRs should remain in the TS. The Commission noted that in allowing certain items to be relocated to licensee-controlled documents while requiring that other items be retained in the TS, it was adopting the qualitative standard enunciated by the Atomic Safety and Licensing Appeal Board in Portland General Electric Co. (Trojan Nuclear Plant), ALAB-531, 9 NRC 263 (1979). There, the Appeal Board observed:

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

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

> Criterion 1 Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.
>
> Criterion 2 A process variable, design feature, or operating restriction that is an initial condition of a design basis accident [DBA] or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.
>
> Criterion 3 A structure, system, or component [SSC] that is part of the primary success path and which functions or actuates to mitigate a [DBA] or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

Criterion 4 [An SSC] which operating experience or probabilistic risk assessment [PRA] has shown to be significant to public health and safety.

Section 3.0 of this SE explains the NRC staff's determination that the conversion of the Turkey Point CTS to ITS based on ISTS, as modified by plant-specific changes, is consistent with the Turkey Point current licensing basis, the requirements and guidance of the Final Policy Statement, and 10 CFR 50.36.

2.1 Description of Proposed TS Changes

The licensee has proposed to replace, in its entirety, Turkey Point's current technical specifications (CTS) to Improved Technical Specifications (ITS) consistent with NUREG-1431, Revision 5.0, "Standard Technical Specifications – Westinghouse Plants."

The revised markups for the various TS Sections are available in the following ADAMS Accession numbers:

TS Section	ADAMS Accession No.
1.0	ML23151A441
2.0	ML23151A442
3.0	ML23151A443
3.1	ML23151A444
3.2	ML23151A445
3.3	ML23151A446
3.4	ML23151A447
3.5	ML23151A448
3.6	ML23151A449
3.7	ML23151A450
3.8	ML23151A451
3.9	ML23151A452
4.0	ML23151A453
5.0	ML23151A454

2.2 Background

Turkey Point has been operating in accordance with the TS issued with the original facility operating licenses, dated September 17, 1980, and September 15, 1981, respectively, as amended. These Turkey Point CTS are formatted similarly to NUREG-0452, "Standard Technical Specifications for Westinghouse PWRs [Pressurized-Water Reactors]." NUREG-0452 is one of the original versions of the standard technical specifications (STS). The proposed conversion of the Turkey Point CTS to ITS is based upon:

- The Turkey Point CTS;
- The Final Policy Statement;
- 10 CFR 50.36; and

- NUREG-1431, Revision 5.0.

Hereinafter, the proposed TS for Turkey Point are referred to as the ITS, the existing TS for Turkey Point are referred to as the CTS, and the improved standard TS, as issued in NUREG-1431, Revision 5.0, are referred to as the ISTS. The corresponding bases are ITS Bases, CTS Bases, and ISTS Bases, respectively. In addition to basing the ITS on the ISTS, the Final Policy Statement, and the requirements in 10 CFR 50.36, the licensee retained portions of the CTS as a basis for the ITS.

Consistent with the Final Policy Statement and 10 CFR 50.36, the licensee proposed, instead of transferring them to the ITS, transferring some CTS requirements to licensee-controlled documents (such as the Turkey Point Technical Requirements Manual (TRM)), for which changes to the documents by the licensee are controlled by a regulation (e.g., 10 CFR 50.59, “Changes, tests, and experiments”) and which may be made without prior NRC approval. NRC-controlled documents, such as the TS, may not be changed by the licensee without prior NRC approval. In addition, human factors principles were emphasized to add clarity to the CTS requirements being retained in/transferred to the ITS, and to define more clearly the appropriate scope of the ITS. Further, significant changes were proposed to the CTS Bases to make each ITS requirement clearer and easier to understand.

The overall objective of the proposed amendment, consistent with the Final Policy Statement, is to rewrite, reformat, and streamline the Turkey Point CTS to provide clearer, more readily understandable requirements to ensure continued safe operation of the plant, while still satisfying the requirements of 10 CFR 50.36. During its review, the NRC staff relied on the Final Policy Statement, 10 CFR 50.36, and the ISTS as guidance for acceptance of the proposed CTS changes. This SE provides a summary of the NRC staff’s conclusion that use of the licensee’s proposed ITS based on the ISTS, as modified by plant-specific changes, is acceptable for the continued operation of Turkey Point. This SE also explains the NRC staff’s conclusion that the licensee’s proposed ITS is consistent with the Turkey Point current licensing basis (CLB) and the requirements of 10 CFR 50.36.

In this SE, the NRC staff relies upon the following license conditions (see Section 5.0 of this SE) to be included in the subsequent renewed facility operating licenses: (1) the requirement to relocate certain CTS requirements into licensee-controlled documents as part of the implementation of the ITS and (2) the schedule for the first performance of new and revised SRs for the ITS.

3.0 TECHNICAL EVALUATION

In its review of the Turkey Point ITS application, the NRC staff evaluated five types of proposed CTS changes as defined by the licensee. The NRC staff’s review also included an evaluation of whether existing regulatory requirements are adequate for controlling future changes to requirements that are proposed to be removed from the CTS and placed in licensee-controlled documents. The following are the five types of proposed CTS changes:

A	Administrative - Changes to the CTS that do not result in new requirements or change operational restrictions and flexibility.

L	Less Restrictive - Changes to the CTS that result in reduced restrictions or added flexibility.

M More Restrictive - Changes to the CTS that result in added restrictions or reduced flexibility.

LA Removed Details - Changes to the CTS that eliminate detail and relocate the detail to a licensee-controlled document. Typically, this involves details of system design and system description including design limits, description of system operation, procedural details for meeting TS requirements or reporting requirements, and cycle-specific parameter limits and TS requirements redundantly located in other licensee-controlled documents.

R Relocated Specifications - Changes to the CTS that relocate LCO and associated requirements that do not meet any of the LCO selection criteria of 10 CFR 50.36(c)(2)(ii) to the TRM, a licensee-controlled document.

The ITS application included a justification for each proposed change to the CTS in a numbered discussion of change (DOC), using the above letter designations, as appropriate. In addition, the ITS application included an explanation of each difference between ITS and ISTS requirements in a numbered justification for deviation.

The DOCs for the CTS, as presented in the ITS application, are listed and described in the following four tables (for all ITS Sections) provided as Attachments 1 through 4 to this SE:

- Table A - Administrative Changes
- Table L - Less Restrictive Changes
- Table M - More Restrictive Changes
- Table R - Relocated Specifications (R) and Removed Detail Changes (LA)

These tables provide a summary description of the proposed changes to the CTS. The tables are only meant to summarize the changes being made to the CTS. More details of the technical justifications and how they are being made to the CTS are provided in the licensee's application and supplemental letters.

The NRC staff's evaluation and additional description of the kinds of changes to the CTS requirements listed in Tables A, L, M, and R attached to this SE are presented in Sections A through E of this SE's technical evaluation, as follows:

- Section A - Administrative Changes (A)
- Section B - Less Restrictive Changes (L)
- Section C - More Restrictive Changes (M)
- Section D - Removed Detail Changes (LA)
- Section E - Relocated Specifications (R)

The control of specifications, requirements, and information relocated from the CTS to licensee-controlled documents is described in Section F below.

A. <u>Administrative Changes to the CTS (A)</u>

Administrative changes to the CTS are intended to incorporate human factors principles into the form and structure of the ITS so that plant operations personnel can use them more easily. These changes are editorial in nature or involve the reorganization or reformatting of CTS requirements without affecting technical content or operational restrictions. In order to ensure consistency, the NRC staff review of the proposed ITS used the ISTS as guidance to reformat and make other non-technical changes to the CTS. Administrative changes are not intended to add, delete, or relocate any technical requirements of the CTS. Examples of administrative changes that the staff determined to be acceptable include:

- Using plant-specific wording for system names
- Reformatting, renumbering, and rewording of CTS with no change in intent
- Splitting up requirements currently grouped under a single specification of the CTS and moving them to more appropriate locations in two or more specifications of the ITS
- Presentation changes that involve rewording or reformatting for clarity (including moving an existing requirement to another location within the TS) but that do not involve a change in requirements
- Wording changes and additions that are consistent with CTS interpretation and practice, and that more clearly or explicitly state existing requirements
- Deletion of obsolete TS
- Deletion of redundant TS requirements that exist elsewhere in the TS

Table A in the attachment to this SE lists the administrative changes to the CTS proposed as part of the Turkey Point ITS conversion. Table A is organized in ITS order by each A-type DOC to the CTS, provides a summary description of the administrative change that would be made, and provides CTS and ITS references. The NRC staff reviewed all of the administrative and editorial changes proposed by the licensee and finds them acceptable because they are consistent with the content and format of the ISTS, do not result in any change in operating requirements, and continue to be consistent with the Commission's regulations.

B. Less Restrictive Changes to the CTS (L)

Less restrictive changes to the CTS involve deletions of or relaxations to portions of the CTS requirements that are proposed to be retained in the ITS. When requirements have been shown to give little or no safety benefit, their relaxation or removal from the TS is acceptable. In most cases, relaxations previously granted to individual plants on a plant-specific basis were the result of (1) generic NRC actions, (2) new NRC staff positions that evolved from technological advancements and operating experience, or (3) resolution of the Owners Groups’ comments on the ISTS. In developing the ISTS, the NRC staff reviewed generic relaxations contained in the ISTS and found them acceptable because they are consistent with current licensing practices and the Commission's regulations. The design of each Turkey Point unit was reviewed to determine if its specific design basis and licensing basis are consistent with the technical basis for the model requirements in the ISTS and thus provide a basis for the ITS and its less restrictive changes to the CTS.

Most proposed changes to the CTS that involve deletions of or relaxations to portions of CTS requirements can be grouped in the following eight categories.

Change Categories:

Category 1 – Relaxation of LCO Requirements

Category 2 – Relaxation of Applicability

Category 3 – Relaxation of Completion Time

Category 4 – Relaxation of Required Action

Category 5 – Deletion of Surveillance Requirement

Category 6 – Relaxation of Surveillance Requirement Acceptance Criteria

Category 7 – Relaxation of Surveillance Frequency

Category 8 – Deletion of Surveillance Requirement Shutdown Performance Requirement

The following discussion addresses why these categories of less restrictive changes are acceptable:

Category 1 – Relaxation of LCO Requirements

Certain CTS LCOs specify limits on operational and system parameters beyond those necessary to ensure meeting safety analysis assumptions and, therefore, are considered overly restrictive. The CTS also contain operating limits that have been shown to give little or no safety benefit to the operation of the plant, even though they satisfy an LCO selection criterion. The ITS, consistent with the guidance in the ISTS, would relax such operating limits to only require the minimum conditions needed to satisfy the safety analysis assumptions.

The proposed changes reflect the ISTS approach to provide LCO requirements that specify the protective conditions required to meet safety analysis assumptions for required features. These conditions replace the lists of specific devices used in the CTS to describe the requirements needed to meet the safety analysis assumptions.

TS changes represented by this category improve the focus on issues important to safety and provide additional reasonable operational flexibility without adversely affecting the safe operation of the plant. The resultant proposed ITS LCOs maintain an adequate degree of protection consistent with the safety analysis. Changes involving the relaxation of LCOs are consistent with the guidance established by the ISTS, taking into consideration the Turkey Point CLB. The NRC staff reviewed all of the Category 1 less restrictive changes to the CTS and, based on the above, finds them acceptable.

Category 2 – Relaxation of Applicability

The CTS require compliance with an LCO during the applicable Mode(s) or other conditions specified in a Specification's Applicability statement. CTS Applicability tends to be more generalized for reactor conditions. ITS takes into consideration the ISTS which adds a level of detail to the applicable conditions that are consistent with the application of the plant safety analyses assumptions for operability of the required features.

Further, where CTS Applicability requirements are inconsistent with the applicable accident analyses assumptions for a system, subsystem, or component specified in the LCO, the licensee proposed to change the LCO to establish a consistent set of requirements in the ITS. These modifications or deletions are acceptable because, during the operational or other conditions specified in the ITS applicability requirements, the LCOs are consistent with the applicable safety analyses. Changes involving relaxation of applicability requirements are consistent with the guidance established by the ISTS, taking into consideration the Turkey Point CLB. The NRC staff reviewed all of the Category 2 less restrictive changes to the CTS and, based on the above, finds them acceptable.

Category 3 – Relaxation of Completion Time

Upon discovery of a failure to meet an LCO, the associated Actions specify time limits (Completion Times) for completing Required Actions specified for the associated applicable Action Conditions. Required Actions establish remedial measures that must be taken within specified Completion Times. Completion Times also specify limits on the duration of plant operation with the associated LCO not met. Incorporating longer Completion Times is acceptable because such Completion Times continue to be based on the operability status of redundant TS required features, the capacity and capability of remaining TS required features, providing reasonable time to repair or replace required features, vendor-developed standard repair times, and the low probability of a DBA occurring during the repair period. Changes involving relaxation of Completion Times are consistent with the guidance established by the Commission, taking into consideration the Turkey Point CLB. These changes are generally made to conform to ISTS and have been evaluated to not be detrimental to plant safety. The NRC staff reviewed all of the Category 3 less restrictive changes to the CTS and, based on the above, finds them acceptable.

Category 4 – Relaxation of Required Action

LCOs specify the lowest functional capability or performance levels of equipment that is deemed adequate to ensure safe operation of the facility. When an LCO is not met, the associated Actions specify restoring the affected SSC to its required capability or performance level, i.e., operable status, or implementing remedial measures that provide an equivalent level of protection. These Actions minimize the risk associated with continued operation while providing time to repair inoperable features. Some Required Actions specify placing the unit in a MODE in which the LCO does not apply. Adopting Required Actions from the ISTS is acceptable because the Required Actions take into account the operability status of redundant systems for required features, the capacity and capability of the remaining features, and the compensatory attributes of the Required Actions as compared to the LCO requirements.

Compared to CTS required actions, certain proposed ITS required actions would result in extending the time period during which the licensee may continue to operate the unit with LCO-specified equipment inoperable. Upon the expiration of this time period, further action, which may include shutting down the plant, is required. These ITS actions provide measures that adequately compensate for the inoperable equipment and are commensurate with the safety importance of the inoperable equipment, plant design, and industry practice. Therefore, these action requirements will continue to ensure the safe operation of the plant. Changes involving the relaxation of action requirements are consistent with the guidance established by the ISTS, taking into consideration the Turkey Point CLB. The NRC staff reviewed all of the Category 4 less restrictive changes to the CTS and, based on the above, finds them acceptable.

Category 5 – Deletion of Surveillance Requirement

The CTS require maintaining LCO-specified SSCs operable by meeting SRs in accordance with specified SR frequencies. These SRs include conducting tests to demonstrate that such SSCs are operable and that LCO-specified parameters are within specified limits. When the test acceptance criteria and any specified conditions for the conduct of the test are met, the equipment is deemed operable. The changes of this category relate to the deletion of CTS SRs, the deletion of acceptance criteria, and the deletion of the conditions required for performing the SR.

The ITS would not retain unnecessary CTS SRs that do not contribute to the verification that equipment can perform its required functions to meet an LCO. Deleting the SRs, including the acceptance criteria and/or conditions for performing the SRs, for these items is consistent with the objective of the ISTS, without reducing confidence that the equipment is operable. LCO-required equipment continues to be tested in a manner and at a frequency necessary for assuring that the equipment can perform its safety functions. For example, the CTS contain SRs that are not included in the ISTS for a variety of reasons. Such SRs include measuring values and parameters that are not necessary to meet ISTS LCO requirements. In addition, the ISTS may not include reference to specific acceptance criteria contained in the CTS, because these acceptance criteria are not necessary to meet ISTS LCO requirements or are defined in other licensee-controlled documents.

The deletion of unnecessary CTS SRs is acceptable because SRs with appropriate testing standards are retained for verifying that the LCO-required features are operable, taking into consideration the Turkey Point CLB. Therefore, based on the above, upon review of all of the Category 5 deletion of SRs changes to the CTS, the NRC staff finds these changes acceptable.

Category 6 – Relaxation of Surveillance Requirement Acceptance Criteria

Prior to placing the plant in a specified operational Mode or other condition stated in the Applicability of an LCO, and in accordance with the specified SR time interval thereafter, the CTS require establishing the operability of each LCO-required SSC by meeting the SRs associated with the LCO. This usually entails performance of tests to demonstrate the operability of the LCO-required SSC, or the verification that specified parameters are within LCO limits. A successful demonstration of operability requires meeting the specified acceptance criteria, as well as any specified conditions, for the conduct of the test. Relaxations of CTS SRs can include relaxing both the acceptance criteria and the conditions of performance.

For example, the ITS would allow some SRs to verify operability under actual or test conditions. Adopting the ITS allowance for these conditions is acceptable because required features cannot distinguish between an “actual” signal or a “test” signal. Also included are changes to CTS SRs that would be replaced in the ITS with separate and distinct testing requirements that, when combined, provide operability verification of all components required in the LCO for the features specified in the CTS that would continue to be specified in the ITS. Changes that would provide exceptions to SRs to allow for variations that do not affect the results of the test are also included in this category.

These relaxations of CTS SRs optimize test requirements for the affected safety systems and increase operational flexibility. These CTS SR relaxations are consistent with the guidance established by the ISTS, taking into consideration the Turkey Point CLB. The NRC staff reviewed all of the Category 6 less restrictive changes to the CTS and, based on the above, finds them acceptable.

Category 7 – Relaxation of Surveillance Frequency

Prior to placing the plant in a specified operational Mode or other condition stated in the applicability of an LCO, and in accordance with the specified surveillance test interval (frequency) thereafter, the CTS require establishing the operability of each LCO-required SSC by meeting the SRs associated with the LCO. This usually entails the performance of tests to demonstrate the operability of the LCO-required SSC, or the verification that specified parameters are within LCO limits. A successful demonstration of an LCO-required SSC's operability requires meeting the specified acceptance criteria, as well as any specified conditions, for the conduct of the test, at a specified frequency to assure adequate reliability and availability of the LCO-required SSC.

Category 7 relaxations of CTS SRs involve extending surveillance test intervals. Increasing the time interval between surveillance test performances in the ITS results in decreased equipment unavailability due to testing. The relaxation of a surveillance frequency can also include the addition of Surveillance Notes that allow testing to be delayed until appropriate unit conditions for the test are established, or exempt testing in certain operational Modes or other specified conditions in which the testing cannot be performed.

Reduced testing is also acceptable where operating experience or other deterministic criteria have demonstrated that specific SSCs usually pass the surveillance when performed at the specified surveillance test interval, thus the relaxed surveillance frequency is acceptable from a reliability standpoint. Surveillance frequency changes to incorporate alternate train testing have also been shown to be acceptable where other qualitative or quantitative test requirements are required that are established predictors of system performance.

These CTS surveillance frequency relaxations are consistent with the guidance established by the ISTS, taking into consideration the Turkey Point CLB. The NRC staff reviewed all of the Category 7 less restrictive changes to the CTS and, based on the above, finds them acceptable.

Category 8 – Deletion of Surveillance Requirement Shutdown Performance Requirement

The CTS require maintaining LCO-specified SSCs operable by meeting SRs in accordance with specified surveillance frequencies. This includes conducting tests to demonstrate that such SSCs are operable and that LCO-specified parameters are within specified limits. When the test acceptance criteria and any specified conditions for the conduct of the test are met, the equipment is deemed operable. The changes of this category relate to the proposed deletion of CTS surveillances required to be performed during shutdown conditions.

Category 8 changes do not include restrictions on unit conditions. The control of the unit conditions, appropriate to perform a test, is an issue for procedures and scheduling, which give proper regard for surveillance performance and the effect on the safe operation of the plant, and has been determined by the NRC staff to be unnecessary as a TS surveillance performance restriction. As indicated in NRC-issued Generic Letter (GL) 91-04, "Changes in Technical

Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," dated April 2, 1991, allowing this control is consistent with the vast majority of other TS surveillances that do not dictate unit conditions for surveillance performance. This change is designated as less restrictive because the surveillance may be performed at plant conditions other than shutdown, which the CTS require.

Proposed new surveillance frequencies in the ITS have been evaluated to ensure that they provide an acceptable level of equipment reliability. The performance of the surveillances will continue to be limited to conditions where an assessment has determined that plant safety will either be maintained or enhanced. The NRC staff reviewed all of the Category 8 less restrictive changes to the CTS and, based on the above, finds them acceptable.

Table L in the attachment to this SE lists the less restrictive changes to the CTS proposed as part of the Turkey Point ITS conversion. Table L is organized in ITS order by each L-type DOC to the CTS, provides a summary description of the less restrictive change that would be made, provides CTS and ITS references, and provides a reference to the specific change category discussed above. In the eight categories, the proposed less restrictive changes to the CTS are acceptable because they will not adversely impact the safe operation of the facility. The NRC staff reviewed all of the less restrictive changes to the CTS proposed by the licensee and finds that the proposed ITS requirements are consistent with the CLB, operating experience, and plant design basis accident and transient analyses, and provide reasonable assurance that public health and safety will be adequately protected.

C. More Restrictive Changes to the CTS (M)

The licensee, in electing to implement ITS consistent with the ISTS, with consideration of the Turkey Point CLB, proposed a number of requirements that are more restrictive than those in the CTS. The proposed ITS requirements in this category include requirements that are either new to Turkey Point, more conservative than corresponding requirements in the CTS, or have additional restrictions that are not in the CTS but are in the ISTS. The deletion of CTS allowances contained in certain LCOs for special test exceptions, which suspend compliance with certain LCOs during special tests, is also designated as more restrictive because the ITS would not include these allowances (which are no longer needed because the associated testing is obsolete and no longer performed).

These changes include additional requirements that decrease allowed outage times (Required Action Completion Times), increase the frequency of surveillance performance, specify additional surveillances, increase the scope of LCOs to include additional plant equipment, increase the applicability of LCOs, or provide additional Actions when the associated LCO is not met. These changes are generally made to conform to the ISTS and have been evaluated to not be detrimental to plant safety.

Table M in the attachment to this SE lists the more restrictive changes to the CTS proposed as part of the Turkey Point ITS conversion. Table M is organized in ITS order by each M-type DOC to the CTS, provides a summary description of each more restrictive change that would be made, and references the affected CTS and ITS requirements. The NRC staff reviewed all of the more restrictive changes to the CTS proposed by the license and finds the changes to be acceptable because they provide additional restrictions on plant operation that enhance safety.

D. Removed Details (LA)

When a TS requirement or detailed information in a TS requirement has been shown to give little or no safety benefit, its removal from the TS is acceptable. In most cases, relocation of such details to licensee-controlled documents that were previously granted to individual plants on a plant-specific basis were the result of (1) generic NRC actions, (2) new NRC staff positions that evolved from technological advancements and operating experience, or (3) resolution of the Owners Groups' comments on the ISTS. The NRC staff reviewed proposed generic relaxations to pre-improved STS, which were included in the ISTS, and found them acceptable because they were consistent with accepted licensing practices and the Commission's regulations for nuclear power reactor facilities. The design of each Turkey Point unit was reviewed to determine if its specific design basis and licensing basis are consistent with the technical basis for the model requirements in the ISTS and thus provide a basis for the ITS and the removal of details as compared to the CTS.

Details proposed to be removed from individual specifications evaluated to be Types 1 through 6 are as described below.

Type 1 - Removing Details of System Design and System Description, Including Design Limits

The design of the facility is required to be described in the Updated Final Safety Analysis Report (UFSAR) by 10 CFR 50.34, "Contents of applications; technical information." In addition, the quality assurance requirements of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities," require that the plant design be documented in controlled procedures and drawings and maintained in accordance with an NRC-approved Quality Assurance Topical Report (QATR). The regulation at 10 CFR 50.59 specifies controls for changing the facility as described in the UFSAR. The regulation at 10 CFR 50.54(a) specifies criteria for changing the QATR. The TRM is a general reference in the UFSAR and changes to it are accordingly also subject to 10 CFR 50.59. The ITS Bases also contain descriptions of system design. ITS 5.5.11, "Technical Specification Bases Control Program," specifies controls for changing the Bases. Removing details of system design is acceptable because the associated CTS requirements being retained without these details are adequate to ensure safe operation of the facility.

In addition, retaining such details in TS is unnecessary to ensure proper control of changes. Cycle-specific design limits are contained in the Core Operating Limits Report (COLR) in accordance with GL 88-16, "Removal of Cycle-Specific Parameter Limits from Technical Specifications," dated October 3, 1988. ITS Section 5.6, "Reporting Requirements," includes the programmatic requirements for the COLR. Based on the above, the NRC staff finds it acceptable to remove Type 1 details from the CTS and place them in licensee-controlled documents.

Type 2 - Removing Descriptions of System Operation

The plans for normal and emergency operation of the facility are required to be described in the UFSAR by 10 CFR 50.34. ITS 5.4.1.a and 5.4.1.d require that written procedures be established, implemented, and maintained for plant operating procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, "Quality Assurance

Program Requirements (Operation),” dated February 1978, and in all programs specified in ITS Section 5.5, “Programs and Manuals,” respectively. The ITS Bases also contain descriptions of system operation. Controls specified in 10 CFR 50.59 apply to changes in procedures as described in the UFSAR and TRM. ITS 5.5.11 specifies controls for changing the Bases. Removing details of system operation is acceptable because the associated CTS requirements being retained without these details are adequate to ensure safe operation of the facility. In addition, retaining such details in TS is unnecessary to ensure proper control of changes. Based on the above, the NRC staff finds it acceptable to remove Type 2 details from the CTS and place them in licensee-controlled documents.

Type 3 - Removing Procedural Details for Meeting TS Requirements or Reporting Requirements

Details for performing TS SRs or for regulatory reporting are more appropriately specified in plant procedures. Changes to procedural details include those associated with limits retained in the ITS. For example, ITS 5.4.1 requires that written procedures covering activities that include all programs specified in ITS Section 5.5 be established, implemented, and maintained.

Prescriptive procedural information in a TS requirement is unlikely to contain all procedural considerations necessary for the plant operators to comply with TS and all regulatory reporting requirements, and referral to plant procedures is, therefore, required in any event. Based on the above, the NRC staff finds it acceptable to remove Type 3 details from the CTS and place them in licensee-controlled documents.

Type 4 - Removal of LCO, SR, or other TS requirement to the TRM, UFSAR, ODCM, QAP, CLRT Program, IST Program, ISI Program, or Surveillance Frequency Control Program

Certain CTS administrative requirements are redundant with respect to current NRC regulations and thus are proposed to be relocated to the UFSAR or other appropriate licensee-controlled documents. The Final Policy Statement allows licensees to relocate to licensee-controlled documents any TS requirements that do not meet any of the criteria for mandatory inclusion in the TS.

Examples of the proposed changes include moving details out of the CTS and into the Technical Specifications Bases, the UFSAR, the Containment Leakage Rate Testing (CLRT) Program, the TRM, and other documents under regulatory control such as the Offsite Dose Calculation Manual (ODCM), the Quality Assurance Program (QAP), the Inservice Testing (IST) Program, the Inservice Inspection (ISI) Program, and the Surveillance Frequency Control Program (SFCP). The removal of this information is considered to be less restrictive administratively, because it is no longer controlled by the Technical Specification change process. Typically, the information moved is descriptive in nature and its removal conforms to the ISTS. Changes made in accordance with the provisions of licensee-controlled documents are subject to the specific requirements of those documents. For example, 10 CFR 50.54(a) governs changes to the QAP, while ITS 5.5.11 governs changes to the ITS Bases. Therefore, it is acceptable to remove these details from the CTS and place them in licensee-controlled documents.

To the extent that information is proposed to be relocated to licensee-controlled documents, such information is not required to prevent the possibility of an abnormal situation or event giving rise to an immediate threat to public health and safety. Further, where such information is contained in CTS LCOs and associated requirements in the TS, the NRC staff has concluded that they do not fall within any of the four criteria set forth in 10 CFR 50.36(c)(2)(ii) and discussed in the Final Policy Statement (see Section 2.0 of this SE). Accordingly, existing detailed information, such as generally described above, may be removed from the CTS and not included in the ITS. Based on the above, the NRC staff finds it acceptable to remove Type 4 details from the CTS and place them in licensee-controlled documents.

Type 5 – Removal of SR Frequencies to the Surveillance Frequency Control Program

Licensees have the option to retain their SR frequencies or adopt Technical Specifications Task Force (TSTF) Traveler TSTF-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – RITSTF [Risk-Informed TSTF] Initiative 5b" (ML090850627). TSTF-425 is incorporated into NUREG-1431, Revision 4.0 and requires a formal technical review. When implemented, TSTF-425 relocates certain periodic frequencies of TS SRs to the licensee-controlled SFCP, and provides requirements for the new program in the Administrative Controls section of the TS. ITS 5.5.16 describes the requirements for the program to control changes to the relocated surveillance frequencies. The surveillance test requirements remain in the ITS. The SFCP ensures that SRs specified in the ITS are performed at intervals sufficient to assure the associated LCOs are met. This proposed change is designated as a less restrictive removal of detail change, because the surveillance frequencies are being removed from the TS and are no longer controlled by the Technical Specification change process.

Based on the above, the NRC staff finds the removal of SR frequency details from the TS acceptable, because this type of information is not necessary to be included in the TS to provide adequate protection of public health and safety.

Type 6 – Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

The NRC documented in GL 88-16 that cycle-specific parameter limits are not necessary to be included in the TS to provide adequate protection of public health and safety. The ITS would retain the Shutdown Margin (SDM) requirement. The methodologies used to develop the parameters in the COLR have obtained approval by the NRC in accordance with GL 88-16. The removed information will be adequately controlled in the COLR under the requirements provided in ITS 5.6.3. ITS 5.6.3 ensures that the applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, emergency core cooling system limits, and nuclear limits such as SDM, transient analysis limits, and accident analysis limits) of the safety analyses are met. This change is designated as a less restrictive removal of detail change because information relating to cycle-specific parameter limits is being removed from the TS and is no longer controlled by the Technical Specification change process.

Based on the above, the NRC staff finds the removal of cycle-specific parameter limits from the TS to the COLR acceptable because the cycle-specific limits are developed or utilized under NRC-approved methodologies that will ensure that the safety limits are met.

Table R in the attachment to this SE lists, in part, the less restrictive removed detail changes (LA) to the CTS proposed as part of the Turkey Point ITS conversion. Table R contains the following columns:

1. The ITS/CTS number, followed by the DOC number (e.g., LA01);
2. The reference numbers of the associated CTS requirements;
3. A summary description of the relocated details and requirements;
4. The name of the licensee-controlled document to contain the relocated details and requirements (location);
5. The regulation (or ITS specification) for controlling future changes to the relocated requirements (change control process); and
6. The change type (i.e., Types 1 through 6).

The NRC staff reviewed all of the less restrictive removed detail changes to the CTS proposed by the license and finds the changes to be acceptable as discussed above.

E. Relocated Specifications (R)

The Final Policy Statement states that LCOs and associated requirements that do not satisfy or fall within any of the four specified criteria (now contained in 10 CFR 50.36(c)(2)(ii)) may be relocated from existing TS to appropriate licensee-controlled documents as noted in Section D above.

This section of the SE discusses the proposed relocation of entire specifications from the CTS to licensee-controlled documents. These specifications generally would include LCOs, Action Statements (i.e., Actions), and associated SRs. In its application, the licensee proposed relocating such specifications from the CTS to licensee-controlled documents. The NRC staff has reviewed the licensee's submittals and finds that the relocation of these requirements is acceptable in that the LCOs and associated requirements were found not to fall within the scope of 10 CFR 50.36(c)(2)(ii) and changes to licensee-controlled documents will be adequately controlled by 10 CFR 50.59, as applicable. These provisions will continue to be implemented by appropriate plant procedures (i.e., operating procedures, maintenance procedures, surveillance and testing procedures, and work control procedures).

Table R in the attachment to this SE lists, in part, the relocated specifications changes proposed as part of the Turkey Point ITS conversion. Table R contains the columns as stated in Section D above.

The specifications proposed to be relocated from the CTS are not required to be in the TS because they do not fall within the criteria for mandatory inclusion in the TS as stated in 10 CFR 50.36(c)(2)(ii). These specifications are not needed to obviate the possibility that an abnormal situation or event will give rise to an immediate threat to the public health and safety. The NRC staff reviewed all of the proposed relocations and determined that appropriate controls have been established for all of the current specifications and information being moved to the TRM. Therefore, based on the above, the staff finds these changes to be acceptable. These relocations are the subject of a new license condition discussed in Section 5.0 of this SE. Until incorporated in licensee-controlled documents, changes to these specifications and information will be controlled in accordance with the current applicable procedures and regulations.

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

As part of the ITS conversion, the licensee proposed to relocate specifications, requirements, and detailed information from the CTS to licensee-controlled documents. This is discussed in Sections D and E above. The facility and procedures described in the UFSAR and TRM can be revised in accordance with the provisions of 10 CFR 50.59 to ensure that records are maintained, and appropriate controls are established over those requirements removed from the CTS and future changes to the requirements. Other licensee-controlled documents contain provisions for making changes consistent with applicable regulatory requirements. The documentation of these changes will be maintained by the licensee in accordance with the record retention requirements specified in the QAP and such applicable regulations as 10 CFR 50.59.

The license condition for the relocation of requirements from the CTS, which is discussed in Section 5.0 of this SE, addresses the implementation of the ITS conversion and the schedule for the relocation of the CTS requirements to licensee-controlled documents.

3.1 Technical Evaluation Summary

Based on the above evaluation, and as detailed in the attached tables, the NRC staff concludes that the proposed ITS conversion changes are in accordance with the Turkey Point current licensing basis, the requirements and guidance of the Final Policy Statement, and 10 CFR 50.36 and, therefore, are acceptable.

4.0 LICENSEE COMMITMENTS

In reviewing the proposed ITS conversion for Turkey Point, the NRC staff relied upon the licensee's commitments to relocate certain requirements from the CTS to licensee-controlled documents as described in Table R in the attachment to this SE. This table, and Sections 3.0 D and E of this SE, reflect the relocations described in the licensee's submittals. In response to an NRC staff request, the licensee proposed license conditions to make these commitments enforceable (see Section 5.1 of this SE). Such commitments from the licensee must be made requirements of the licenses because the acceptability of removing certain requirements from the TS is based on those requirements being relocated to licensee-controlled documents where further changes to the requirements will be controlled by applicable regulations or other requirements (e.g., 10 CFR 50.59).

5.0 LICENSE CONDITIONS

5.1 Improved Technical Specifications Implementation License Condition

In Enclosure 7 of its letter dated April 4, 2023, the licensee proposed license conditions that describe (1) a schedule to begin performing new and revised SRs after ITS implementation and (2) the relocation of certain CTS requirements and license conditions to other licensee-controlled documents prior to ITS implementation. In response and for the reasons discussed in Section 4.0 of this SE, the following new License Condition K, "Improved Technical Specifications Implementation License Conditions," is included in the subsequent renewed facility operating licenses for the units. Note that the below license condition is specific to Turkey Point Unit 3 and that the same language is used for Unit 4 with the exception of the different amendment number, which is shown in brackets:

K. <u>Improved Technical Specifications Implementation License Conditions</u>

1. Relocation of Certain Technical Specification Requirements

   License Amendment 297 [290] authorizes the relocation of certain Technical Specifications previously included in Appendix A to other licensee-controlled documents. Implementation of this amendment shall include relocation of the requirements to the specified documents, as described in Table R, Relocated Specifications and Removed Detail Changes, attached to the NRC staff's Safety Evaluation, which is enclosed in this amendment.

2. Schedule for New and Revised Surveillance Requirements (SRs)

   The schedule for performing SRs that are new or revised in License Amendment 297 [290] shall be as follows:

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

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

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

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

The NRC staff reviewed the above schedule for the licensee to begin performing the new and revised SRs and concludes that it is acceptable because there is no extra time allowed between surveillances beyond what is approved in this amendment. The schedule allows the licensee to have a reasonable implementation period to prepare for numerous changes. The licensee stated that its planned implementation period is within 180 days of the issuance of this amendment.

Because the commitments discussed in Section 4.0 of this SE are being relied upon for the acceptability of the amendment, a license condition is included in the amendment that will enforce the proposed relocation of requirements from the CTS to licensee-controlled documents. The relocations are described in Table R in the attachment to this SE. The license condition states that implementation of this amendment shall include relocation of these requirements to the specified documents. The relocation of these requirements to the specified documents is to be implemented within 180 days of this amendment. The NRC staff finds this acceptable because the licensee is still required to meet the current licensing basis until the time of implementation.

5.2 Removal of Obsolete License Conditions

In Enclosure 7 of its letter dated April 4, 2023, the licensee stated that there are several license conditions that have been satisfied and are now obsolete and, therefore, proposed that these conditions be deleted.

License Condition C, Final Safety Analysis Report

License Condition 3.C currently states:

> The licensee's Final Safety Analysis Report supplement submitted pursuant to 10 CFR 54.21(d), as revised on November 1, 2001, describes certain future inspection activities to be completed before the period of extended operation. The licensee shall complete these activities no later than July 19, 2012.
>
> The Final Safety Analysis Report supplement as revised on November 1, 2001, described above, shall be included in the next scheduled update to the Final Safety Analysis Report required by 10 CFR 50.71(e)(4), following the issuance of this renewed license. Until that update is complete, the licensee may make changes to the programs described in such supplement without prior Commission approval, provided that the licensee evaluates each such change pursuant to the criteria set forth in 10 CFR 50.59 and otherwise complies with the requirements in that section.

The licensee stated that the referenced inspection activities and FSAR update in this license condition have been completed. Therefore, the NRC staff concludes that the license condition is no longer necessary and can be deleted.

Transition License Conditions of License Condition 3.D

License Condition 3.D, Fire Protection, specifies three transition license conditions that were required to be completed before achieving full compliance with 10 CFR 50.48(c) for the Turkey Point Fire Protection Program (FPP). This section of License Condition 3.D currently states:

> Transition License Conditions
>
> 1. Before achieving full compliance with 10 CFR 50.48(c), as specified by 2. and 3. below, risk-informed changes to the licensee's fire protection program may not be made without prior NRC review and approval unless the change has been demonstrated to have no more than a minimal risk impact, as described in 2. above.
>
> 2. The licensee shall implement the modifications to its facility, as described in Enclosure 1, Attachment S, Table S-2, "Plant Modifications Committed," of FPL letter L-2014-303, dated 11/05/2014, to complete the transition to full compliance with 10 CFR 50.48(c) by the end of the second refueling outage

(for each unit) following issuance of the license amendment. The licensee shall maintain appropriate compensatory measures in place until completion of these modifications.

3. The licensee shall implement the items listed in Enclosure 5, Attachment S, Table S-3, "Implementation Items," of FPL letter L-2018-219, dated 12/3/2018, with the exception of items 12, 18 and 19, no later than 12 months after issuance of the license amendment dated 5/28/2015. Items 12, 18 and 19 are associated with modifications in Table S-2 and will be completed in accordance with Transition License Condition 2 above.

The licensee stated that these three transition license conditions are no longer necessary since the required facility modifications have been completed following implementation of license amendments 262 and 257 for Turkey Point Units 3 and 4, respectively (ML15061A237). Therefore, the NRC staff concludes that the license conditions are no longer necessary and can be deleted.

License Condition 3.H

License Condition 3.H, "PAD TCD [Thermal Conductivity Degradation] Safety Analyses", specify license conditions for the use of the Performance Analysis and Design Model (PAD) methodology in the safety analyses. License Condition 3.H currently states:

> PAD 4.0 TCD has been specifically approved for use for the Turkey Point licensing basis analyses. Upon NRC's approval of a revised generic version of PAD that accounts for Thermal Conductivity Degradation (TCD), FPL will within six months:
>
> a. Demonstrate that PAD 4.0 TCD remains conservatively bounding in licensing basis analyses when compared to the new generically approved version of PAD w/TCD, or
>
> b. Provide a schedule for the re-analysis using the new generically approved version of PAD w/TCD for any of the affected licensing basis analyses.

The licensee stated that it satisfied License Condition 3.H within six months of the NRC approving a new, generic version of PAD 4.0 w/TCD by providing the schedule, in letter dated March 27, 2015 (ML18086A154), for re-analyzing the affected safety analyses using the NRC-approved PAD 5.0 methodology. Therefore, the NRC staff concludes that the license condition is no longer necessary and can be deleted.

License Condition 3.I.1

License Condition 3.I.1 currently states:

> FPL will complete the items listed in the table of implementation items in the enclosure to FPL letter L-2018-118 dated June 12, 2018, prior to implementation of the Risk Informed Completion Time [RICT] Program.

The licensee stated that the items listed in the table of implementation items in the enclosure to the licensee's letter L-2018-118, dated June 12, 2018 (ML18179A162), were completed prior to implementation of the Turkey Point Units 3 and 4 RICT program, as required. Therefore, the NRC staff concludes that the license condition is no longer necessary and can be deleted.

As discussed above, the NRC staff has determined that the above license conditions have been satisfied and that, therefore, the deletion of these conditions is acceptable.

6.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Florida State official was notified of the proposed issuance of the amendment on July 12, 2023. The State official had no comments.

7.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission previously issued a proposed finding that the amendment involves no significant hazards consideration published in the *Federal Register* on June 14, 2022 (87 FR 114), and there has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

8.0 CONCLUSION

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

Principal Contributors: TSweat, NRR
CHarbuck, NRR
ARussell, NRR
CAshley, NRR
JWilson, NRR
KWest, NRR
MHamm, NRR
SSmith, NRR
RElliott, NRR
RGrover, NRR
MMahoney, NRR

Date: September 27, 2023

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
Refer to DOC section in ML23151A441	Chapter 1.0, Use and Application		
1.0 A01	In the conversion of the Turkey Point Nuclear Generating Station Unit Nos. 3 and 4 (PTN), Current Technical Specifications (CTS) to the plant-specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 5.0, "Standard Technical Specifications-Westinghouse Plants," Volume 1, Specifications (ADAMS Accession No. ML21259A155) (referred to as ISTS). These changes are designated as administrative changes and do not result in technical changes to the CTS.	1.1 1.2 1.3 1.4	1.1 through 1.32
1.0 A02	Not used.	N/A	N/A
1.0 A03 1.0 A03 (continued)	CTS 1.5 defines a CHANNEL CALIBRATION as “the adjustment, as necessary, of the channel such that it responds within the required range and accuracy to known values of input. The CHANNEL CALIBRATION shall encompass the entire channel including the sensors and alarm, interlock and/or trip functions. The CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping, or total channel steps, and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step.” ITS defines a CHANNEL CALIBRATION as “the adjustment, as necessary, of the channel output such that it responds within the necessary range and accuracy to known values of the parameter that the channel monitors. The CHANNEL CALIBRATION shall encompass all devices in the channel required for channel OPERABILITY. Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an inplace qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel. The CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping, or total channel steps, and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step.” This results in a number of changes to the CTS.	1.1	1.5

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	These changes are designated as administrative because the changes do not result in a technical change to the Technical Specifications (TS).		
1.0 A04 1.0 A04 (continued)	CTS Section 1.3 defines ANALOG CHANNEL OPERATIONAL TEST as "the injection of a simulated signal into the channel as close to the sensor as practicable to verify OPERABILITY of alarm, interlock and/or trip functions. The ANALOG CHANNEL OPERATIONAL TEST shall include adjustments, as necessary, of the alarm, interlock and/or Trip Setpoints such that the setpoints are within the required range and accuracy. The ANALOG CHANNEL OPERATIONAL TEST may be performed by means of any series of sequential, overlapping, or total channel steps, and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step." CTS Section 1.11 defines DIGITAL CHANNEL OPERATIONAL TEST as “the injection of a simulated signal into the channel as close to the sensor as practicable to verify OPERABILITY of alarm, interlock, and/or trip functions. The DIGITAL CHANNEL OPERATIONAL TEST may be performed by means of any series of sequential, overlapping, or total channel steps, and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step.” ITS Section 1.1 renames and combines the CTS definitions to CHANNEL OPERATIONAL TEST (COT) and defines it as “the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify OPERABILITY of all devices in the channel required for channel OPERABILITY. The COT shall include adjustments, as necessary, of the required alarm, interlock, and trip setpoints required for channel OPERABILITY such that the setpoints are within the necessary range and accuracy. The COT may be performed by means of any series of sequential, overlapping, or total channel steps, and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step.” This changes the CTS by stating that the COT shall include adjustments, as necessary, of the devices in the channel so that the setpoints are within the required range and accuracy, changes the CTS by combining the type of devices contained in the definition, and states that the test may be performed by means of any series of sequential, overlapping, or total channel steps. The addition of use of an actual signal is discussed in DOC L01.	1.1	1.3 1.11

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	These changes are designated as administrative because the changes do not result in a technical change to the TSs.		
1.0 A05	CTS Chapter 1.0 includes the following definitions: • CONTAINMENT INTEGRITY • CONTROLLED LEAKAGE • CORE ALTERATIONS • FREQUENCY NOTATION • GAS DECAY TANK SYSTEM • PURGE – PURGING • SITE BOUNDARY • SOURCE CHECK • UNRESTRICTED AREA • VENTING • STAGGERED TEST BASIS The ITS does not use this terminology and ITS Section 1.1 does not contain these definitions. The FREQUENCY NOTATION definition deletion is discussed in DOC LA02. These changes are designated as administrative because the changes eliminate defined terms that are no longer used.	1.1	1.7 1.8 1.9 1.14 1.15 1.21 1.25 1.26 1.27 1.31 1.32
1.0 A06	CTS Chapter 1.0 provides definitions for IDENTIFIED LEAKAGE, UNIDENTIFIED LEAKAGE, and PRESSURE BOUNDARY LEAKAGE. ITS Section 1.1 includes these requirements in one definition called LEAKAGE (which includes three categories: identified LEAKAGE, unidentified LEAKAGE, and pressure boundary LEAKAGE). This changes the CTS by incorporating the definitions into the ITS LEAKAGE definition with no technical changes.	1.1	1.16 1.20 1.30

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	This change is designated an administrative change in that it rearranges existing definitions, with no change in intent.		
1.0 A07	The CTS Chapter 1.0 definition of OPERABLE - OPERABILITY requires a system, subsystem, train, component, or device to be capable of performing its "specified function(s)" and all necessary support systems to also be capable of performing their "function(s)." The ITS Section 1.1 definition of OPERABLE - OPERABILITY requires the system, subsystem, train, component, or device to be capable of performing the "specified safety function(s)," and requires all necessary support systems that are required for the system, subsystem, train, component, or device to perform its "specified safety function(s)" to also be capable of performing their related support functions. This changes the CTS by altering the requirement to be able to perform "functions" to a requirement to be able to perform "specified safety functions." This change is designated as administrative as it does not change the current use and application of the TSs	1.1	1.17
1.0 A08 1.0 A08 (continued)	The CTS Chapter 1.0 definition of OPERABLE - OPERABILITY requires that all necessary electrical power be available for the system, subsystem, train, component, or device to be OPERABLE. The ITS Section 1.1 definition of OPERABLE - OPERABILITY replaces the phrase "electrical power" with "normal or emergency electrical power." This changes the CTS definition of OPERABLE - OPERABILITY by allowing a device to be considered OPERABLE with either normal or emergency power available. This change is designated administrative since the ITS definition is effectively the same as the CTS definition.	1.1	1.17

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A09	CTS Chapter 1.0 and Table 1.2, "OPERATIONAL MODES," provide a description of the MODES. CTS Chapter 1.0 and Table 1.2 contains Note ** that states, "Fuel in the reactor vessel with the vessel head closure bolts less than fully tensioned or with the head removed." ITS Section 1.1 and Table 1.1-1, "MODES," changes the CTS MODE definitions. These changes are designated as administrative because the changes clarify the application of the MODES and no technical changes to the MODE definitions are made.	1.1 Table 1.1-1	1.18 Table 1.2
1.0 A10	CTS Chapter 1.0 provides a definition of SHUTDOWN MARGIN (SDM). The ITS Section 1.1 definition of SDM contains two differences from the CTS definition. • The CTS definition of SDM does not include a statement requiring an increased allowance for the withdrawn worth of an immovable or untrippable control rod(s). This requirement is contained in CTS 4.1.1.1.1.a and CTS 4.1.1.2.a. The ITS definition of SDM includes this increased allowance by stating, “With any RCCA not capable of being fully inserted, the reactivity worth of the RCCA must be accounted for in the determination of SDM.” This changes the CTS definition of SDM to include the requirement in CTS 4.1.1.1.1.a and CTS 4.1.1.2.a for an increased allowance for the withdrawn worth of the immovable or untrippable control rod(s). • The CTS definition is clarified to include a description of the reactor fuel and moderator temperature conditions (i.e., nominal zero power level) at which the SDM is calculated when in MODE 1 or 2. These changes are designated as administrative because the changes do not represent a technical change to the TSs.	1.1	1.24 4.1.1.1.1.a 4.1.1.2.a

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A11	The CTS definition states that the TRIP ACTUATING DEVICE OPERATIONAL TEST shall verify that the channel is OPERABLE "including alarm, interlock, and/or trip functions." Similarly, the ITS requirement states that the COT shall verify OPERABILITY of "all devices in the channel required for trip actuating device OPERABILITY." The CTS and the ITS use different examples of what is included in a channel, but this does not change the intent of the requirement. The ITS use of the phrase "all devices in the channel required for trip actuating device OPERABILITY" reflects the CTS understanding that the test includes only those portions of the channel needed to perform the specified safety function(s). This change is designated as administrative because it does not result in a technical change to the TSs.	1.1	1.29
1.0 A12 1.0	CTS Table 1.2, OPERATIONAL MODES, is revised. The corresponding table in ITS Section 1.1 is Table 1.1-1, MODES. The changes to the CTS are: • The CTS Table 1.2 minimum average reactor coolant temperature for MODES 1 and 2 is changed from ≥ 350 degrees Fahrenheit (°F) to "NA" (not applicable) in ITS Table 1.1-1. • The CTS Table 1.2 MODE 6 upper limit on average reactor coolant temperature (< 140 °F) is removed. In ITS Table 1.1-1, the MODE 6 average reactor coolant temperature limit is specified as "NA" (not applicable). • The CTS Table 1.2 % RATED THERMAL POWER limit of 0% for MODES 3, 4, 5, and 6 is changed in ITS Table 1.1-1 to "NA" (not applicable). • CTS Table 1.2 contains the unit designators of percent (%) and degrees Fahrenheit (°F) next to the values. This is changed in ITS Table 1.1-1 by removing the designator from the individual value(s). These changes are designated as administrative because the changes result in	1.1 Table 1.1-1	Table 1.2

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
A12 (continued)	no technical changes to the TSs.		
1.0 A13	ITS Sections 1.2, 1.3, and 1.4 contain information that is not in the CTS. This change to the CTS adds explanatory information on ITS usage that is not applicable to the CTS. The added sections are: • <u>Section 1.2 - Logical Connectors</u> Section 1.2 provides specific examples of the logical connectors "<u>AND</u>" and "<u>OR</u>" and the numbering sequence associated with such use. • <u>Section 1.3 - Completion Times</u> Section 1.3 provides guidance on the proper use and interpretation of Completion Times. The section also provides specific examples that aid in the use and understanding of Completion Times. • <u>Section 1.4 – Frequency</u> Section 1.4 provides guidance on the proper use and interpretation of Surveillance Frequencies. The section also provides specific examples that aid in the use and understanding of Surveillance Frequencies. This change is designated as administrative because it does not result in a technical change to the TSs.	1.2 1.3 1.4	None

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
Refer to DOC section in ML23151A442	Chapter 2.0, Safety Limits		
2.0 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	2.1 2.2	2.1
Refer to DOC section in ML23151A443	Chapter 3.0, LCO and SR Applicability		
3.0 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	LCO 3.0.2 LCO 3.0.3 LCO 3.0.4 LCO 3.0.5 LCO 3.0.6 LCO 3.0.7 LCO 3.0.10 SR 3.0.1 SR 3.0.2 SR 3.0.3 SR 3.0.4 SR 3.0.6	3.0 3.0.2 3.0.3 3.0.4 3.0.5 3.0.6 3.0.7 4.0.1 4.0.2 4.0.3 4.0.4 4.0.5 4.0.6
3.0 A02 3.0	CTS 3.0.1 states that Limiting Conditions for Operation (LCOs) shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2. ITS LCO 3.0.1 states, "LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2, LCO 3.0.7, LCO 3.0.8, and LCO 3.0.9." This results in the addition to the phrase "except as provided in LCO 3.0.2, LCO 3.0.7, LCO 3.0.8, and LCO 3.0.9" in ITS LCO 3.0.1. ITS LCO 3.0.7 describes Test Exception LCOs, which are exceptions to other LCOs. ITS LCO 3.0.8	LCO 3.0.1	3.0.1

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
A02 (continued)	addresses actions for snubber inoperabilities, which is also an exception to other LCOs. ITS LCO 3.0.9 addresses barrier inoperabilities, which is also an exception to other LCOs. Changes resulting from the incorporation of ITS LCO 3.0.7, LCO 3.0.8 and LCO 3.0.9 are discussed in Discussions of Change (DOC) A09, M01, and L01, respectively. This addition is needed for consistency in the ITS requirements and does not change the intent or application of the TSs.		
3.0 A03	CTS use the term Action to describe the prescribed remedial measures under designated conditions to be completed within a specified time when an LCO is not met. Included in the CTS Action(s) are the designated conditions and time interval in which the Action must be completed. ITS uses the terms Condition, Required Action, and Completion Time to describe the prescribed remedial measures under designated conditions to be completed within a specified time when an LCO is not met. This change does not result in a change to the intent or application of the TSs, but merely reflect editorial preferences in the ITS.	LCO 3.0.2 LCO 3.0.6 LCO 3.0.10	3.0.2 3.0.5 3.0.7
3.0 A04	CTS 3.0.3, in part, is applicable "When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements." ITS LCO 3.0.3 expands those applicability requirements so that the requirement is applicable "When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS." This changes the CTS to add two new applicability conditions. These changes are designated as administrative because they do not result in any technical changes to the TSs.	LCO 3.0.3 LCO 3.0.4	3.0.3 3.0.4

Table A – Administrative Changes

<table>
<tr><th>ITS/CTS No. and Discussion of Changes (DOC) No.</th><th>Description of Change</th><th>ITS Requirement</th><th>CTS Requirement</th></tr>
<tr><td>3.0
A05</td><td>CTS 3.0.3, in part, states that within one hour action shall be initiated to place the unit in a MODE in which the Specification does not apply by placing it, as applicable, in: at least Hot Standby within the next 6 hours, at least Hot Shutdown within the following 6 hours, and at least Cold Shutdown within the subsequent 24 hours. ITS LCO 3.0.3 states that action shall be initiated within 1 hour to place the unit, as applicable, in MODE 3 within 7 hours, MODE 4 within 13 hours, and MODE 5 within 37 hours. This changes the CTS by using the elapsed time since entry into ITS LCO 3.0.3 instead of the sum of the CTS 3.0.3 sequential times (i.e., the ITS Completion Time of 37 hours to enter MODE 5 is the same as the sum of the CTS allowance of 1 hour, 6 hours, 6 hours, and 24 hours). With the CTS sequential times, each time is measured from the completion of the previous step up to the time specified for the step). The maximum time allowed in CTS 3.0.3 to be in the next lower Mode are the same as stated in ITS LCO 3.0.3; these times are listed below:

<table>
<tr><th><u>Mode</u></th><th><u>Title</u></th><th><u>CTS Time to Enter Mode</u></th><th><u>ITS Time to Enter Mode</u></th></tr>
<tr><td>--</td><td>(Current Mode)</td><td>1 hour to begin action</td><td>1 hour to begin action</td></tr>
<tr><td>3</td><td>Hot Standby</td><td>within the next 6 hours</td><td>7 hours</td></tr>
<tr><td>4</td><td>Hot Shutdown</td><td>within the following 6 hours</td><td>13 hours</td></tr>
<tr><td>5</td><td>Cold Shutdown</td><td>within the subsequent 24 hours</td><td>37 hours</td></tr>
</table>

These changes are designated as administrative as they apply rules of usage established by ITS without resulting in technical changes to the Technical Specifications.</td><td>LCO 3.0.3</td><td>3.0.3</td></tr>
<tr><td>3.0
A06</td><td>CTS 3.0.3 states "Where corrective measures are completed that permit operation under the ACTION requirements, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation." ITS LCO 3.0.3 states "Where corrective measures are completed that permit</td><td>LCO 3.0.3</td><td>3.0.3</td></tr>
</table>

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required. LCO 3.0.3 is applicable in MODES 1, 2, 3, and 4." These changes are designated as administrative because there is no change in the intent or application of the CTS 3.0.3 requirements.		
3.0 A07	CTS 3.0.3 states, in part, that "LCO 3.0.3 is not applicable in MODES 5 and 6". ITS states that "LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4". CTS 3.0.3 and ITS LCO 3.0.3 require the unit to be placed only as low as COLD SHUTDOWN (MODE 5). Once the unit is in MODE 5, there are no further requirements associated with CTS 3.0.3 or ITS LCO 3.0.3. Thus, CTS 3.0.3 and ITS LCO 3.0.3 are effectively only applicable in MODES 1, 2, 3, and 4, and the addition of the sentence merely reflects editorial preferences used in the ITS. This change is designated as administrative because there is no change in the intent or application of the CTS 3.0.3 requirements.	LCO 3.0.3	3.0.3
3.0 A08	CTS 3.0.6 provides an exception to other LCO applicability TS stating, in part, "This is an exception to LCO 3.0.1 and 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY." ITS LCO 3.0.5 (equivalent to CTS 3.0.6) states, in part, "This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY. This changes the CTS by removing the LCO 3.0.1 exception. This change is designated as administrative because it corrects an oversight error from a previously approved license amendment.	LCO 3.0.5	3.0.6
3.0 A09	ITS LCO 3.0.7 is added to the CTS. ITS LCO 3.0.7 states "Test Exception LCO 3.1.8, "PHYSICS TEST Exceptions – MODE 2" allows specified Technical Specification (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Test Exception LCOs is optional. When a Test Exception LCO is desired to be met but is not met, the ACTIONS of the Test Exception LCO shall	LCO 3.0.7	None

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	be met. When a Test Exception LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications." This change is designated as administrative because it does not technically change the TSs.		
3.0 A10	CTS 4.0.2 states, "Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval." ITS Surveillance Requirement (SR) 3.0.2 states, "The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met. For Frequencies specified as "once," the above interval extension does not apply. If a Completion Time requires periodic performance on an "once per. . ." basis, the above Frequency extension applies to each performance after the initial performance. Exceptions to this Specification are stated in the individual Specifications." This results in several changes to the CTS. • CTS 4.0.2 states, "Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval." ITS SR 3.0.2 states, in part, "The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency." This change is being made to be consistent with the ITS terminology and to clarify the concept of the specified SR Frequency being met.	SR 3.0.2	4.0.2
3.0 A10 (continued)	• ITS SR 3.0.2 is more specific regarding the associated Frequency by stating, "as measured from the previous performance or as measured from the time a specified condition of the Frequency is met." This direction is consistent with the current use and application of the TSs.		

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	• ITS SR 3.0.2 adds to the CTS "For Frequencies specified as "once," the above interval extension does not apply." This is described in DOC M01 for TS 3.0. The changes, except as discussed in DOC M01, are designated as administrative because they reflect presentation and usage rules of the ITS without making technical changes to the TSs.		
Refer to DOC section in ML23151A444	Section 3.1, Reactivity Control Systems		
3.1.1 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.1.1	3.1.1.1 3.1.1.2
3.1.1 A02	CTS 3.1.1.1 provides the SHUTDOWN MARGIN (SDM) requirement in MODES 1, 2, 3, and 4 (i.e., Reactor Coolant System (RCS) average temperature (T_{avg}) greater than 200°F). CTS 3.1.1.2 provides the SDM requirement in MODE 5 (i.e., T_{avg} less than or equal to 200°F). ITS 3.1.1 provides the SDM requirement in MODE 2 with core reactivity coefficient k-effective (k_{eff}) < 1.0 and MODES 3, 4, and 5. This changes the CTS by combining the SDM requirements in MODE 2 with k_{eff} < 1.0 and MODES 3, 4, and 5. The change in Applicability for MODE 2 with k_{eff} < 1.0 is described in DOC A03. This change is designated as administrative because it does not result in a technical change to the CTS.	3.1.1	3.1.1.1 3.1.1.2
3.1.1 A03	CTS 3.1.1.1 provides the SDM requirement in MODES 1, 2, 3, and 4 (i.e., T_{avg} greater than 200°F). CTS 4.1.1.1.1 states, when in MODES 1 and 2 with $k_{eff} \geq 1.0$, verify the control bank withdrawal is within the limits of Specification 3.1.3.6. ITS 3.1.1 is Applicable in MODE 2 with k_{eff} < 1.0 and MODES 3, 4, and 5. This changes the CTS by combining the SDM requirement in MODE 2 with k_{eff} < 1.0 and MODES 3, 4, and 5. The change in Applicability for MODE 1 and MODE 2 with $k_{eff} \geq 1.0$ is described in ITS 3.1.6 (Control Bank Insertion Limits).	3.1.1	3.1.1.1

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	This change is designated as administrative because it does not result in a technical change to the CTS.		
3.1.1 A04	CTS 3.1.1.1 Applicability is MODES 1, 2, 3, and 4 with a footnote (footnote *) for MODE 2 stating "See Special Test Exception 3.10.1." ITS 3.1.1 does not contain the footnote or a reference to the Special Test Exception. This changes the CTS by not including footnote * in the ITS. This change is designated as administrative as it incorporates an ITS convention with no technical change to the CTS.	None	3.1.1.1
3.1.2 A01	In the conversion of the Turkey Point Nuclear Generating Station (PTN) CTS to the plant specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG - 1431, Rev. 5.0, "Standard Technical Specifications - Westinghouse Plants" (ISTS).	3.1.2	3.1.1.1
3.1.2 A02 3.1.2 A02 (continued)	CTS 4.1.1.1.2 requires the overall core reactivity balance to be compared to predicted values to demonstrate agreement within ± 1% delta core reactivity/core reactivity ($\Delta k/k$). However, this Surveillance is currently part of the SHUTDOWN MARGIN (SDM) Specification. Additionally, CTS 3.1.1.1 is titled SHUTDOWN MARGIN – T_{avg} Greater Than 200°F. A new Limiting Condition for Operation (LCO), ITS LCO 3.1.2, requires the measured core reactivity to be within ± 1% $\Delta k/k$ of predicted values. Furthermore, ITS 3.1.2 is titled Core Reactivity. This changes the CTS by having a separate Specification for the Core Reactivity requirement and changing the title. This change is designated as administrative because it does not result in a technical change to the CTS.	LCO 3.1.2	3.1.1.1

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.1.2 A03	CTS 4.1.1.1.2 requires the overall core reactivity balance to be compared to predicted values to demonstrate agreement within ± 1% Δk/k in accordance with the Surveillance Frequency Control Program (SFCP). ITS Surveillance Requirement (SR) 3.1.2.1 includes a Note stating that this SR is "Only required after 60 effective full power days (EFPD)." This Note clarifies the CTS Surveillance Frequency by explicitly stating within the ITS SR's Frequency column the time in core life at which periodic performance of the SR in accordance with the SFCP must begin. This change is designated as administrative because it does not result in a technical change to the CTS.	SR 3.1.2.1	4.1.1.1.2
3.1.3 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.1.3	3.1.1.3
3.1.3 A02	The Applicability of CTS 3.1.1.3 is modified by footnote ** stating "See Special Test Exception 3.10.3." ITS 3.1.3 Applicability does not contain the footnote or a reference to the Special Test Exception. This changes the CTS by not including footnote ** in the ITS. This change is designated as administrative as it incorporates an ITS convention with no technical change to the CTS.	None	3.1.1.3
3.1.3 A03	CTS 3.1.1.3 ACTION a.1 states that if the Moderator Temperature Coefficient (MTC) is more positive than the beginning of life (BOL) limit, control rod withdrawal limits must be imposed within 24 hours, or the unit must be in HOT STANDBY within the next 6 hours. ITS 3.1.3 ACTION A states that with the MTC not within the beginning of core life (BOL) limit, establish administrative control rod withdrawal limits within 24 hours or ACTION B requires the unit to be in MODE 2 with k_{eff} < 1.0 within the next 6 hours. This changes the CTS by requiring the unit to be in MODE 2 with k_{eff} < 1.0 instead of HOT STANDBY (i.e., MODE 3).	3.1.3 ACTION B	3.1.1.3 Action a.1

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	This change is designated as administrative because it does not result in a technical change to the CTS.		
3.1.3 A04	CTS 3.1.1.3 ACTION a.1 states that if the MTC is more positive than the BOL limit, then control rod withdrawal limits must be established. It also states that these withdrawal limits shall be in addition to the insertion limits of Specification 3.1.3.6. ITS 3.1.3 does not contain this statement. This changes the CTS by not including the statement that the withdrawal limits shall be in addition to the insertion limits of Specification 3.1.3.6. This change is designated as administrative because it does not result in a technical change to the CTS.	None	3.1.1.3 Action a.1
3.1.3 A05	CTS 3.1.1.3 states, in part, that "The maximum upper limit shall be less positive than or equal to +5.0 x 10-5 Δk/k/°F." ITS 3.1.3 brackets the MTC limit. Because the value is stated as the "maximum upper limit," it is not necessary to add further qualification to the limiting value. This changes the CTS by not including the phrase "less positive than or equal to" preceding the limiting value. This change is designated as administrative because it does not result in a technical change to the CTS	3.1.3	3.1.1.3
3.1.4 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.1.4	3.1.3.1 3.1.3.4 4.1.1.1 4.1.1.2
3.1.4 A02	CTS 3.1.3.1 Applicability is modified by Footnote * which states "See Special Test Exceptions 3.10.2 and 3.10.3." ITS 3.1.4 Applicability does not contain this Note. This changes the CTS by not including Footnote *. This change is designated as administrative because it does not result in a technical change to the CTS.	None	3.1.3.1 Applicability

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.1.4 A03	CTS 3.1.3.1 ACTION d.2 states "The remainder of the rods in the bank with the inoperable rod are aligned to within the Allowed Rod Misalignment of Specification 3.1.3.1 of the inoperable rod while maintaining the rod sequence and insertion limits of Specification 3.1.3.6; the THERMAL POWER level shall be restricted pursuant to Specification 3.1.3.6 during subsequent operation." ITS 3.1.4 does not contain a Required Action stating that the remainder of the rods in the group must be aligned with the misaligned rod. This changes the CTS by not including a specific Required Action stating that the remainder of the rods in the group must be aligned with the misaligned rod. The moving of the remaining rods to within the Limiting Condition for Operation (LCO) limit of the misaligned rod, while complying with all of the other rod position requirements, is simply restoring compliance with the LCO. Restoration of compliance with the LCO is always an available Required Action and it is the convention of the ITS to not state such "restore" options explicitly unless it is the only action or is required for clarity. This change is designated as administrative because it does not result in technical changes to the CTS.	None	3.1.3.1 Action d.2
3.1.4 A04	CTS 3.1.3.4 ACTION states with the drop time of any full-length rod determined to exceed the above limit restore the rod drop time to within the above limit prior to proceeding to MODE 1 or 2. ITS 3.1.4 does not have a similar requirement. This changes the CTS by not explicitly requiring, in the ITS 3.1.4 ACTIONS, restoration of the rod drop time prior to proceeding to MODE 1 or 2. The action prohibiting entry into MODES 1 and 2 with the rod drop time requirements not met is redundant to CTS 4.0.4 and ITS 3.0.4 since the LCO 3.0.4 allowance for mode entry could not be applied for this configuration. This change is designated as administrative because it does not result in a technical change to the CTS.	None	3.1.3.4 Action

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.1.4 A05	CTS 3.1.3.1 ACTIONS b.1, c.1, and d.1 require a misaligned rod to be restored to OPERABLE status within one hour. ITS 3.1.4 does not contain a Required Action stating this. This changes the CTS by not specifically stating that the restoration of Allowed Rod Misalignment is required. The convention in the ITS is to not state such "restore" options explicitly in an ACTION unless it is the only action or is required for clarity. This change is designated as an administrative change since it does not result in technical changes to the CTS.	None	3.1.3.1 Actions b.1, c.1, and d.1
3.1.5 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.1.5	3.1.3.5
3.1.5 A02	CTS 3.1.3.5 states "All shutdown rods shall be fully withdrawn." Additionally, the title of CTS 3.1.3.5 is "SHUTDOWN ROD INSERTION LIMIT." ITS Limiting Condition for Operation (LCO) 3.1.5 states "Each shutdown bank shall be within insertion limits specified in the COLR." Furthermore, ITS 3.1.5 title has been changed to "SHUTDOWN BANK INSERTION LIMIT." This changes the CTS by requiring each shutdown bank to be within COLR insertion limits in LCO 3.1.5 instead of the equivalent requirement that all shutdown rods be fully withdrawn. This change is designated as an administrative change because it does not result in a technical change to the CTS.	3.1.5	3.1.3.5
3.1.5 A03	CTS 3.1.3.5 Applicability is modified by a footnote (footnote *) which states "See Special Test Exceptions 3.10.2 and 3.10.3." ITS 3.1.5 Applicability does not contain this footnote or a reference to the Special Test Exceptions. This changes the CTS by not including footnote *. It is an ITS convention to not include these types of footnotes or cross-references.	None	3.1.3.5

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	This change is designated as administrative because it does not result in a technical change to the CTS.		
3.1.5 A04 3.1.5 A04 (continued)	CTS 3.1.3.5 ACTION states "With a maximum of one shutdown rod not fully withdrawn, except for surveillance testing pursuant to Specification 4.1.3.1.2…". The ITS 3.1.5 LCO Note states "Not applicable to shutdown banks inserted while performing SR 3.1.4.2." (SR 3.1.4.2 states, "Verify rod freedom of movement (trippability) by moving each rod not fully inserted in the core ≥ 10 steps in either direction.") The CTS statement excepting performance of the ACTION during performance of the Surveillance has been moved to an LCO Note in ITS 3.1.5 excepting compliance with LCO 3.1.5 during the Surveillance. This change to the CTS is administrative because the ITS presentation of the exception, like the CTS, would also suspend performance of the specified ACTION while performing the Surveillance. The ITS presentation of the exception is also consistent with the clearer presentation of ISTS 3.1.5. This change is designated as administrative because it does not result in a technical change to the CTS.	LCO 3.1.5	3.1.3.5
3.1.6 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.1.6	3.1.3.6 3.1.1.1
3.1.6 A02	CTS 3.1.3.6 Applicability is modified by a footnote (Footnote *) that states "See Special Test Exceptions 3.10.2 and 3.10.3." ITS 3.1.6 Applicability does not contain the footnote or a reference to the Special Test Exceptions. This changes the CTS by not including Footnote *. This change is designated as administrative because it does not result in a technical change to the CTS.	3.1.6	3.1.3.6

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.1.6 A03	CTS 3.1.3.6 ACTION b states "Reduce THERMAL POWER within two hours to less than or equal to that fraction of RATED THERMAL POWER which is allowed by the bank position specified in the Rod Bank Insertion Limits curve, defined in the CORE OPERATING LIMITS REPORT." ITS 3.1.6 Required Action B.2 requires restoring the control banks to within limits within 2 hours. This changes the CTS by eliminating the explicit statement that compliance with the LCO can be restored in order to exit the ACTION. This change is considered administrative because the technical requirements have not changed.	3.1.6	3.1.3.6 Action b
3.1.6 A04 3.1.6 A04 (continued)	CTS 3.1.3.6 ACTION c requires the unit to be in HOT STANDBY (MODE 3) within 6 hours if ACTION a or b are not met. The CTS Applicability is MODES 1 and 2 with k_{eff} ≥ 1.0. ITS 3.1.6 ACTION D requires the unit to be in MODE 2 with k_{eff} < 1.0. This changes the CTS by requiring the unit to be in MODE 2 with k_{eff} < 1.0 instead of HOT STANDBY (MODE 3). This change is designated as administrative because it does not result in a technical change to the CTS.	3.1.6 ACTION D	3.1.3.6 Action c
3.1.6 A05	CTS 3.1.3.6 ACTION states, "With the control banks inserted beyond the above insertion limits, except for surveillance testing pursuant to Specification 4.1.3.1.2…". The ITS 3.1.6 LCO Note states "Not applicable to control banks inserted while performing SR 3.1.4.2." (SR 3.1.4.2 states, “Verify rod freedom of movement (trippability) by moving each rod not fully inserted in the core ≥ 10 steps in either direction.”) The CTS statement excepting performance of the ACTION during performance of the Surveillance has been moved to an LCO Note in ITS 3.1.6 excepting compliance with LCO 3.1.6 during the Surveillance. This change to the CTS is administrative because the ITS presentation of the exception, like the CTS, would also suspend performance of the specified ACTION while performing the Surveillance. The ITS presentation of the exception is also consistent with the clearer presentation of ISTS 3.1.6.	3.1.6	3.1.3.6

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	This change is designated as administrative because it does not result in a technical change to the CTS.		
3.1.7 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.1.7	3.1.3.2
3.1.7 A02	CTS LCO 3.1.3.2.a in part states, "within one hour after rod motion (allowance for thermal soak)," when referring to rod position. The ITS 3.1.7 LCO Note states, "Individual [rod position indicators] RPIs are not required to be OPERABLE for 1 hour following movement of the associated rods." This changes the CTS by changing the wording of the requirement and making it an LCO Note. This change is designated as administrative because it does not result in technical changes to the CTS.	3.1.7 LCO Note	LCO 3.1.3.2.a
3.1.7 A03	CTS 4.1.3.2.1 requires each analog RPI to be determined to be OPERABLE by verifying that the Demand Position Indication System and the Analog Rod Position Indication System agree within the Allowed Rod Misalignment of Specification 3.1.3.1 (allowing for one hour thermal soak after rod motion) in accordance with the Surveillance Frequency Control Program (SFCP) except during time intervals when the Rod Position Deviation Monitor is inoperable, then compare the Demand Position Indication System and the Analog Rod Position Indication System at least once per 4 hours. ITS 3.1.7 does not contain this SR. However, this Surveillance is redundant to CTS 4.1.3.1.1 which is retained as ITS SR 3.1.4.1. This changes the CTS by removing a duplicate SR. This change represents a presentation difference and is classified as administrative since it does not result in technical changes to the CTS.	None	4.1.3.2.1

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.1.8 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.1.8	3.10.3
3.1.8 A02	CTS Section 3.10 is titled SPECIAL TEST EXCEPTIONS. CTS Specification 3.10.3 is titled PHYSICS TESTS. ITS Section 3.1 is titled REACTIVITY CONTROL SYSTEMS. ITS Specification 3.1.8 is titled PHYSICS TESTS Exceptions – MODE 2. This changes the CTS by changing the title of the Section and the Specification. This change is designated as administrative because it does not result in a technical change to the CTS.	3.1.8	3.10.3
3.1.8 A03 3.1.8 A03 (continued)	CTS 3.10.3 states the limitations of certain Specifications may be suspended during the performance of PHYSICS TESTS. ITS LCO 3.1.8 includes an allowance to reduce the required number of channels for ITS LCO 3.3.1, "Reactor Trip System (RTS) Instrumentation," Function 2 (Power Range Neutron Flux), and Function 17.d (Power Range Neutron Flux, P-10) from "4" to "3." This is consistent with CTS Table 3.3-1, which currently specifies that a minimum of 3 channels for each of these RTS Functions be OPERABLE. This changes CTS 3.10.3 by adding an allowance to reduce the number of required RTS channels from "4" to "3" for specified Functions. This change is designated as administrative because it does not result in technical changes to the CTS.	3.1.8	3.10.3
3.1.8 A04	CTS 3.10.3.b states that the limitations of certain Specifications may be suspended during the performance of PHYSICS TESTS provided the reactor trip setpoints on the OPERABLE Intermediate and Power Range Nuclear Channels are set at less than or equal to 25% of RATED THERMAL POWER. ITS 3.1.8 states the requirements of certain Specifications may be suspended but contains no requirements on the Intermediate and Power Range Channels. The ITS contains the same requirements on the Intermediate and Power Range Channels in ITS LCO 3.3.1. This changes the CTS by eliminating from the test exception the requirement that the Reactor Trip Setpoints for	3.1.8	3.10.3.b

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	the OPERABLE Intermediate and Power Range Channels be set at ≤ 25% of RATED THERMAL POWER. This change is designated as administrative as it eliminates a repeated requirement from the CTS, resulting in no technical change to the CTS.		
3.1.8 A05	CTS 3.10.3 is applicable in MODE 2. ITS LCO 3.1.8 is applicable during PHYSICS TESTS initiated in MODE 2. This changes the CTS such that the Specification is applicable in MODE 2 only when a PHYSICS TEST is initiated. This change is designated as administrative because it clarifies the current wording of the Specification with no change in intent.	3.1.8	3.10.3
Refer to DOC section in ML23151A445	Section 3.2, Power Distribution Limits		
3.2.1 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.2.1	3.2.2
3.2.1 A02	CTS 3.2.2 Action b specifically requires the identification and correction of the cause of the out of limit condition prior to increasing thermal power above the reduced power limit and that the $F_Q^M(Z)$ be demonstrated through incore mapping. ITS 3.2.1 Action A.4 requires that Surveillance Requirement (SR) 3.2.1.1 be performed prior to increasing power above the reduced power limit. Performing SR 3.2.1.1 confirms the out-of-limit condition is identified and corrected and is, therefore, considered equivalent. This change is designated as administrative because the ITS requires SR 3.2.1.1, which is equivalent to the requirements of the CTS.	3.2.1 Action A.4	3.2.2

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.2.1 A03	CTS 3.2.2 Action a requires a reduction in the Power Range Neutron Flux – High and Overpower ΔT trip setpoints at least 1% for every 1% $F_Q^M(Z)$ exceeds the $F_Q^L(Z)$. The CTS 3.2.2 term $F_Q^M(Z)$ refers to the measured Heat Flux Hot Channel Factor ($F_Q(Z)$) and is changed to $F_Q(Z)$ since the $F_Q(Z)$ at the time of the measurement is the actual $F_Q(Z)$. The CTS term $F_Q^L(Z)$ is changed to "limit" because the measured $F_Q(Z)$ is being compared to the $F_Q(Z)$ limit. The measured $F_Q(Z)$ is referred to throughout ITS 3.2.1 as $F_Q(Z)$. ITS 3.2.1 Required Actions A.2 and A.3 require a reduction in the Power Range Neutron Flux – High and Overpower ΔT trip setpoints ≥ 1% for each 1% $F_Q(Z)$ exceeds the limit. This changes the CTS by referencing the measured value of $F_Q(Z)$ as $F_Q(Z)$ and replacing $F_Q^L(Z)$, which is the $F_Q(Z)$ limit at RTP, with the term "limit." This change is designated as administrative because no technical change is being made to the CTS.	3.2.1 Actions A.2 and A.3	3.2.2 Action a
3.2.1 A04	The ITS 3.2.1 Completion Times for Required Actions A.1, A.2, and A.3 state that the Required Actions must be taken "…after each $F_Q(Z)$ determination." CTS 3.2.2, Action A does not explicitly state this requirement. The CTS Action a is understood to apply after each $F_Q(Z)$ determination. This change is designated as administrative because it does not result in a technical change to the CTS.	3.2.1 Actions A.1, A.2 and A.3	3.2.2 Action a
3.2.1 A05	CTS 4.2.2.2.a.2) states that corrective action to reduce $F_j(Z)$ below the limit will permit return to thermal power not to exceed current P_L** as defined in the TS Bases. The ** footnote states P_L is reactor thermal power expressed as a fraction of the Rated Thermal Power (RTP) that is used to calculate $[F_j(Z)]_s$. P_L, as defined in the CTS Bases, is thermal power expressed as a fraction of 1 (i.e., 100% RTP). ITS 3.2.1 ACTION C does not explicitly state the corrective action that must be taken to permit return to thermal power not to exceed P_L because the statement is redundant to the requirements of CTS 3.0.2. CTS 3.0.2 (ITS LCO 3.0.2) state that if the LCO is met or is no longer applicable prior to expiration of the specified time interval, completion of the ACTION(S) is not required	3.2.1 ACTION C LCO 3.0.2 SR 3.2.1.2	4.2.2.2.a.2 3.0.2

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	unless otherwise stated. Whether stated as a Required Action or not, correction of the entered Condition is an action that may always be considered upon entering ACTIONS. If it is determined that $F_Q(Z)$ requirements are met as specified in the COLR using the augmented calculation per SR 3.2.1.2, the LCO is met and the ACTIONS, except for Required Action C.4, are no longer required. This obviates the need to explicitly state that operation above reactor power at which predicted FQ would exceed its limit (P_T) may continue provided the requirements of the augmented surveillance are initiated. Performance of Required Action C.4 confirms $F_Q(Z)$ is within limits and operation above P_T may proceed. This change is designated as administrative because it does not result in a technical change to the CTS.		
3.2.1 A06	CTS 4.2.2.3.b.2 requires Axial Flux Difference (AFD) (Delta-I) to be maintained within a ± 2% or ± 3% target band to permit base load operation. CTS 4.2.2.4.d requires, in part, AFD (Delta-I) to be maintained within ± 5% of the target axial offset to permit radial burndown operation. ITS 3.2.1 does include requirements associated with AFD (Delta-I). ITS 3.2.3 provides requirements for AFD and LCO 3.2.3 states that the AFD in % flux difference units shall be maintained within the limits specified in the Core Operating Limits Reports (COLR). AFD limits associated with base load operation are relocated to the COLR (i.e., within a ± 2% or ± 3% target band) (Refer to DOC 3.2.1-LA02). AFD limits associated with radial burndown operation are also proposed to be relocated to the COLR (i.e., within ± 5% of the target axial offset) (Refer to DOC 3.2.1-LA02). Therefore, it is unnecessary to explicitly state that AFD (Delta-I) be maintained within a required band. Therefore, this change is designated as administrative because it does not result in a technical change to the CTS.	LCO 3.2.1 LCO 3.2.3	4.2.2.3.b.2 4.2.2.4.d

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.2.1 A07 3.2.1 A07 (continued)	CTS 4.2.2.3d provides actions to perform if any of the conditions of 4.2.2.3.b are not maintained during base load operation. CTS 4.2.2.4.e provides actions to perform if the requirements of Section 4.2.2.4.d are not maintained during radial burndown operation. ITS 3.2.1 Condition D applies if predicted F_Q (F_Q^P) > F_Q limit (F_Q^L) and THERMAL POWER > base load power limit (P_{BL}) specified in the COLR <u>OR</u> when F_Q^P > F_Q^L and THERMAL POWER > radial burndown power limit (P_{RB}) specified in the COLR. It is unnecessary to require an action in ITS 3.2.1 when the condition of CTS 4.2.2.3b.2, that AFD (Delta-I) be within the ± 2% or ± 3% required target band during base load operation, is not met. ITS LCO 3.2.3, "AXIAL FLUX DIFFERENCE (AFD)," states that the AFD in % flux difference units shall be maintained within the limits specified in the COLR and provides action when AFD is not within the required limits. The required AFD (Delta-I) target bands for base load and radial burndown operations are relocated to the COLR (Refer to DOC 3.2.1-LA02). Therefore, when AFD (Delta-I) is outside the required target band during these operations, action will be required per ITS 3.2.3 ACTIONS. In addition, if CTS 4.2.2.3.b.3 (ITS SR 3.2.1.2), which requires full core flux maps to be taken at least once per 31 effective Full Power Days, is not performed within the required Frequency, CTS 4.0.1 and CTS 3.0.2 (ITS SR 3.0.1 and ITS LCO 3.0.2) require ITS 3.2.1 ACTIONS to be performed when a Surveillance is not performed within the required interval. This change is designated as administrative and does not result in a technical change to the CTS.	3.2.1 ACTION D	4.2.2.3.d 4.2.2.4.e
3.2.2 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.2.2	3.2.3
3.2.2 A02	CTS 3.2.3 ACTION c states in part that with $F^N_{\Delta H}$ exceeding its limit, $F^N_{\Delta H}$ must be demonstrated to be within its limit prior to exceeding 50% RATED THERMAL POWER (RTP) and 75% RTP, and within 24 hours of attaining or exceeding 95% RTP. ITS 3.2.2	3.2.2 Action A.3	3.2.3 Action c

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	Required Action A.3 contains the same requirements. However, ITS 3.2.2 Required Action A.3 is modified by a Note which states "THERMAL POWER does not have to be reduced to comply with this Required Action." This modifies the CTS by adding a Note stating that THERMAL POWER does not have to be reduced to comply with the Required Action. This change is designated as administrative, because it does not result in technical changes to the CTS.		
3.2.2 A03 3.2.2 A03 (continued)	CTS 4.2.3.1 "The provisions of Specification 4.0 .4 are not applicable" provides an allowance for entering the next higher MODE of Applicability when the Limiting Condition for Operation (LCO) is not met. ITS LCO 3.2.2 has no specific allowance for changing MODES at any time with ITS LCO 3.2.2 not met. ITS Surveillance Requirement (SR) 3.0.4 is similar to the CTS exception to Specification 4.0.4 by stating "When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4." This change is designated as administrative, because it does not result in technical changes to the CTS.	3.2.2	4.2.3.1
3.2.3 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.2.3	3.2.1
3.2.3 A02	CTS 3.2.1 states the Axial Flux Difference (AFD) "shall be maintained within: a. the allowed Relaxed Axial Offset Control (RAOC) operational space as defined in the CORE OPERATING LIMITS REPORT (COLR), or b. within a +/- 2% or +/- 3% target band about the target flux difference during Base Load operation." CTS 3.2.1 ACTION provides ACTIONs to take when the indicated AFD is outside the COLR limits or Peaking Factor Limit Report. CTS 4.2.1.1 requires a determination that the indicated AFD is within limits. CTS 4.2.1.2 requires a determination that the indicated AFD is within limits. CTS 3.2.1 ACTION states that the indicated AFD shall be considered outside the limits when at least two OPERABLE excore channels are indicating the AFD to be outside the	SR 3.2.3.1 LCO 3.2.3 SR 3.2.3.2	3.2.1 4.2.1.1 4.2.1.2

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	limits. ITS Limiting Condition for Operation (LCO) 3.2.3 states in part the AFD in % flux difference units shall be maintained within the limits specified in the COLR. ITS LCO 3.2.3 is modified by a Note specifying when AFD is considered to be outside the limits. ITS Surveillance Requirement (SR) 3.2.3.1 and ITS SR 3.2.3.2 require verification that AFD is within limits. This changes the CTS by deleting "indicated" and adding "% flux difference units" to the LCO statement. This change is designated as administrative change because it does not result in technical change to the CTS.		
3.2.3 A03	CTS 3.2.1 Applicability contains a footnote (footnote *) which states, "See Special Test Exception 3.10.2." ITS 3.2.3 Applicability does not contain this footnote. This changes the CTS by not including Footnote*. This change is designated as administrative change because it does not result in technical change to the CTS.	3.2.3	3.2.1
3.2.3 A04	CTS 3.2.1 ACTION c states "THERMAL POWER shall not be increased above 50% of RATED THERMAL POWER unless the indicated AFD is within the limits specified in the COLR." ITS 3.2.3 does not contain a similar requirement. This changes the CTS by eliminating a prohibition contained in the CTS. This change is designated as administrative change because it does not result in technical change to the CTS.	3.2.3	3.2.1 Action C
3.2.3 A05	CTS Action b.2 requires THERMAL POWER to be reduced to less than P_T within 30 minutes and Base Load operation to be discontinued within 30 minutes. ITS ACTION A requires THERMAL POWER to be reduced to less than P_T within 30 minutes (A.1) <u>OR</u> Base Load operation to be discontinued within 30 minutes (A.2). This changes the CTS by changing the conjunction between the two Actions from "and" to "OR." This change is designated as administrative change because it does not result in technical change to the CTS.	3.2.3	3.2.1

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ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.2.4 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS. These changes are designated as administrative change because they do not result in technical change to the CTS.	3.2.4	3.2.4
3.2.4 A02	CTS 3.2.4 states "The QUADRANT POWER TILT RATIO [QPTR] shall not exceed 1.02." ITS Limiting Condition for Operation (LCO) 3.2.4 states "The QPTR shall be ≤ 1.02. This changes the CTS by requiring the Quadrant Power Tilt Ratio (QPTR) to be less than or equal to 1.02. This change is designated as administrative change because it does not result in technical change to the CTS.	LCO 3.2.4	3.2.4
3.2.4 A03	CTS 3.2.4 Applicability contains a footnote (footnote *) that states "See Special Test Exceptions Specification 3.10.2." ITS 3.2.4 Applicability does not contain this footnote. This changes the CTS by not including the footnote reference. This change is designated as administrative change because it does not result in technical change to the CTS.	3.2.4	3.2.4
3.2.4 A04	CTS 3.2.4 ACTION a states "With the QUADRANT POWER TILT RATIO determined to exceed 1.02 but less than or equal to 1.09." CTS 3.2.4 ACTION b states "With the QUADRANT POWER TILT RATIO determined to exceed 1.09 resulting from misalignment of either a shutdown or control rod." CTS 3.2.4 ACTION c states "With the QUADRANT POWER TILT RATIO determined to exceed 1.09 due to causes other than the misalignment of either a shutdown or control rod." ITS 3.2.4 ACTION A states "QPTR not within limit." This changes the CTS by specifying that action must be taken when the QPTR is not within limits. (See DOCS L02, L03, and L04 for changes to the compensatory measures.)	3.2.4 ACTION A	3.2.4 Action A Action B Action C

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	This change is designated as administrative change because it does not result in technical change to the CTS.		
3.2.4 A04 (continued)	CTS 3.2.4 ACTION a.1.a) states that with QPTR greater than 1.02 and less than or equal to 1.09, calculate the QPTR at least once per hour until either QPTR is reduced to within its limit or THERMAL POWER is reduced to less than 50% of RATED THERMAL POWER (RTP). CTS 3.2.4 ACTION a.2.a) states that within 2 hours, either QPTR is reduced to within its limit or reduce THERMAL POWER at least 3% from RTP for each 1% of indicated QPTR in excess of 1.00 and similarly reduce the Power Range Neutron Flux-High Trip Setpoints within the next 4 hours. CTS 3.2.4 ACTION b.1.a) states that with QPTR greater than 1.09 due to misalignment of either a shutdown or control rod, calculate the QPTR at least once per hour until either QPTR is reduced to within its limit or THERMAL POWER is reduced to less than 50% of RTP. CTS 3.2.4 ACTION c.1.a) states that with QPTR greater than 1.09 due to causes other than the misalignment of either a shutdown or control rod, calculate the QPTR at least once per hour until either QPTR is reduced to within its limit or THERMAL POWER is reduced to less than 50% of RTP. ITS 3.2.4 does not contain a Required Action stating QPTR must be reduced to within its limit. This changes the CTS by not specifically stating that the restoration of QPTR is required. This change is designated as administrative change because it does not result in technical change to the CTS.	3.2.4	3.2.4 Action A.1.A Action A.2.A Action B.1.a Action C.1.A
3.2.4 A06	CTS 3.2.4 LCO APPLICABLITY is MODE 1 above 50% RTP. CTS 3.2.4 ACTION a.1.b, ACTION b.1.b, and ACTION c.1.b state, in part, to calculate the QPTR at least once per hour until either QPTR is reduced to within limit, or THERMAL POWER is reduced to less than 50% of RTP. ITS 3.2.4 LCO APPLICABILITY is MODE 1 with THERMAL POWER > 50% RTP. ITS 3.2.4 CONDITION B states that when the Required Action and associated Completion Time are not met to reduce THERMAL POWER to ≤ 50% RTP. This changes the CTS requirement of reducing power and exiting the Mode of Applicability to a value of < 50% RTP and allow stopping at a value of 50% RTP.	3.2.4	3.2.4 Action A.1 B Action B.1.B Action C.1.B

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	This change is designated as administrative change because it does not result in technical change to the CTS.		
Refer to DOC section in ML23151A446	Section 3.3, Instrumentation		
3.3.1 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.3.1	3.3.1
3.3.1 A02	CTS 3.3.1 ACTION and CTS Table 3.3-1 provide the compensatory actions to take when Reactor Trip System (RTS) instrumentation is inoperable. ITS 3.3.1 ACTIONS similarly provide the compensatory actions for inoperable RTS Instrumentation. ITS 3.3.1 ACTIONS are modified by a Note that allows separate Condition entry for each Function. In addition, due to the manner in which the Required Channel's description modifies ITS Functions, separate Condition entry is allowed within a Function. This changes the CTS by providing a specific allowance to enter the ACTION for each inoperable RTS instrumentation Function and for certain Functions on a loop, steam generator (SG), bus, or breaker, etc. This change is designated as administrative because it does not result in technical changes to the CTS.	3.3.1 ACTIONS Note	3.3.1 Action
3.3.1 A03	CTS 3.3.1 ACTIONS and Surveillance Requirements (SRs) are not listed in the respective ACTIONS and Surveillance Requirements Sections of the Technical Specification. These are referenced in specific tables and located directly behind the respective Tables. ITS 3.3.1 places the ACTIONS and SRs respectively in the Sections of the TSs labeled as ACTIONS and Surveillance Requirements. This changes the CTS by moving the ACTIONS and SRs back under the respective Sections of the TSs.	3.3.1 ACTIONS SRs	3.3.1 Actions SRs

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	This change is designated as administrative because it does not result in technical changes to the CTS.		
3.3.1 A04	CTS Table 3.3-1 Functions 1, 4.c, 19, and 20, when in MODES 3*, 4*, and 5*, and Table 4.3-1 Functions are modified by an Applicability Note * that makes the listed Functions applicable when the Reactor Trip System Breakers (RTSBs) are in the closed position and the Control Rod Drive System is capable of rod withdrawal. CTS Table 3.3-1, ACTION 9, is applicable to the same functions as listed above and requires the RTSBs to be opened within one hour when the instrument channels cannot be restored in 48 hours. ITS Table 3.3.1-1 Functions 1, 4, 19 and 20, when in MODES 3[(a)], 4[(a)], and 5[(a)] are modified by an Applicability Note [(a)] that makes the Functions applicable with the Control Rod Drive System capable of rod withdrawal or with one or more rods not fully inserted. ITS ACTION K is applicable to the same Functions and requires initiation to fully insert all rods immediately and to place the Rod Control System in a condition incapable of rod withdrawal within one hour. This changes the CTS Applicability in MODES 3, 4, and 5 by not making these Functions applicable when the RTSBs are in the closed position as long as the control rods are not capable of being withdrawn and adding that the Functions are applicable when one or more control rods are not fully inserted. The ACTIONS are being changed by deleting the requirement to open the RTSBs and adding the requirement to initiate action to fully insert all rods and place the Rod Control System in a condition incapable of rod withdrawal. This change is designated as administrative because it does not result in technical changes to the CTS.	Table 3.3.1-1 Note a	Table 3.3-1 Note Table 4.3-1 Note
3.3.1 A05	CTS 3.3.1, ACTION 2.c, requires an alternative to reducing power to 75% of RATED THERMAL POWER (RTP); it allows the channel to be placed in trip and the QUADRANT POWER TILT RATIO (QPTR) monitored by performing SR 3.2.4.2 once per 12 hours. ITS 3.3.1, Action D, provides the same alternative; however, it is modified by a Note that states, "only required to be performed when the Power Range Neutron flux input to QPTR is inoperable." This changes the CTS by adding clarification when performing the alternate method.	3.3.1 Action D.22 Note	3.3.1, Action 2.c

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	This change is designated as administrative because it does not result in technical changes to the CTS.		
3.3.1 A06	CTS 3.3.1, ACTION 6, requires that with the number of OPERABLE channels one less than the total number of channels, Startup and /or power operations may proceed until performance of the next CHANNEL OPERATIONAL TEST (COT) provided the inoperable channel is placed in trip. ITS 3.3.1, ACTION L, contains the requirement to place the channel in trip; however, it does not state that it is limited to the next COT. However, based on how a COT is performed, the same time limit is applied. In addition, ITS 3.3.1, ACTION M, requires power to be reduced to less than P-7 if the Required Action or Completion Time of ACTION L is not met. This changes the CTS by deleting the requirement, until performance of the next required COT, and adopting ITS 3.3.1, ACTION M. This change is designated as administrative because it does not result in technical changes to the CTS.	3.3.1 ACTION L ACTION M	3.3.1, ACTION 6
3.3.1 A07	CTS 3.3.1, ACTION 11, requires the plant to be taken to MODE 3 within 6 hours. The applicability for the Function is MODE 1. ITS 3.3.1, ACTION N, requires the unit to be in MODE 2 within 6 hours. This changes the CTS by allowing the end state to be MODE 2 versus MODE 3. This change is designated as administrative because both the CTS and ITS requirements are equivalent.	3.3.1 ACTION N	3.3.1, ACTION 11
3.3.1 A08	CTS 3.3.1, ACTION 12, requires with the number of OPERABLE channels one less than the total number of channels that Startup and /or power operations may proceed until performance of the next Actuation Logic Test provided the inoperable channel is placed in trip. ITS 3.3.1, ACTION L, contains the requirement to place the channel in trip; however, it does not state that it is limited to the next Actuation Logic Test. However, based on how an Actuation Logic Test is performed, the same time limit is applied. This changes the CTS by deleting the requirement, until performance of the next required Actuation Logic Test.	3.3.1 ACTION L	3.3.1, ACTION 12

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A08 (continued)	This change is designated as administrative because it does not result in technical changes to the CTS.		
3.3.1 A09	CTS Table 4.3-1, Note 6, contains a requirement that if the quarterly Incore-Excore Calibration above 75% RTP coincides with sustained operation between 30% and 75% of RTP, calibration shall be performed at the lower power level. ITS 3.3.1.6 does not contain the same requirement but includes a Note that states that the calibration is not required to be performed until 24 hours after THERMAL POWER is ≥ 75% RTP. This changes the CTS by not specifying performance of a SR based on its Frequency when below a power level where the SR is required to be performed. This change is designated as administrative because it does not result in technical changes to the CTS.	3.3.1.6 Note	Table 4.3-1 Note 3
3.3.1 A10	CTS 3.3.1, Table 3.3-1, contains Function 19 for the Reactor Trip System Breakers (RTSBs) and contains a Surveillance Note (11) for the Undervoltage and Shunt Trip mechanisms. ITS 3.3.1, Table 3.3.1-1, contains Function 19.a and 19.b for the RTSBs and the Undervoltage and Shunt Trip mechanisms, respectively. This changes the CTS by adding a function for the Undervoltage and Shunt Trip mechanisms. This change is designated as administrative because it does not result in technical changes to the CTS.	Table 3.3.1-1 Functions 19a and 19b	Table 3.3-1 Function 19 Table 4.3-1 Note 7
3.3.1 A11	CTS Table 4.3-1, Note 7, requires each train to be tested in accordance with the SFCP. ITS does not contain this requirement. This changes the CTS by not specifying to refer to the SFCP for SR Frequency information. This change is designated as administrative because it does not result in technical changes to the CTS.	None	Table 4.3-1, Note 7

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A12	CTS Table 4.3-1, Note 1 provides an exception to performing a COT if previously performed within the past 31 days. ITS does not contain this requirement. This changes the CTS by not specifying an exception to the COT. This change is designated as administrative because it does not result in technical changes to the CTS.	None	Table 4.3-1, Note 1
3.3.1 A13 3.3.1	CTS 2.2.1 states that the Reactor Trip System Instrumentation and Interlock Setpoints shall be set consistent with the Trip Setpoint values shown in Table 2.2-1. CTS 2.2.1, Action a, states that with a Reactor Trip System Instrumentation or Interlock Setpoint less conservative than the value shown in the Trip Setpoint column but more conservative than the value shown in the Allowable Value column of Table 2.2-1, adjust the setpoint consistent with the Trip setpoint value within permissible calibration tolerance. CTS 2.2.1, Action b, states with the Reactor Trip System Instrumentation or Interlock Setpoint less conservative than the value shown in the Allowable Values column of Table 2.2-1, either: 1) Adjust the Setpoint consistent with the Trip Setpoint value of Table 2.2-1 and determine within 12 hours that the affected channel is OPERABLE; or 2) Declare the channel inoperable and apply the applicable ACTION statement requirement of Specification 3.3.1 until the channel is restored to OPERABLE status with its setpoint adjusted consistent with the Trip Setpoint value. ITS Limiting Condition for Operation (LCO) 3.3.1 requires the RTS instrumentation for each Function in Table 3.3.1-1 to be OPERABLE and incorporates the CTS actions related to trip setpoints as footnotes to Table 3.3.1-1. ITS Table 3.3.1-1, footnote (f), states, "The instrument channel setpoint shall be reset to a value within the calibration tolerance of the Trip Setpoint at the completion of the surveillance; otherwise, the channel shall be declared inoperable." ITS Table 3.3.1-1 footnote (g) states, "If the instrument channel setpoint is less conservative than the Allowable Value, the setpoint shall be reset consistent with the Trip Setpoint and within 12 hours determine the affected channel is OPERABLE; otherwise, the channel shall be declared inoperable." This changes the presentation of the CTS by incorporating the Action requirements associated with trip setpoints as footnotes to ITS Table 3.3.1-1 and simplifying wording.	None	2.2.1, Actions a and b

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
A13 (continued)	This change is designated as administrative because it does not result in technical changes to the CTS.		
3.3.1 A14	CTS 2.2.1, Action b.2, states: "Declare the channel inoperable and apply the applicable ACTION statement requirement of Specification 3.3.1 until the channel is restored to OPERABLE status with its setpoint adjusted consistent with the Trip Setpoint value." ITS Table 3.3.1-1, footnote (g), does not include the clarifying statement to apply the applicable ACTION statement requirement of Specification 3.3.1 until the channel is restored to OPERABLE status with its setpoint adjusted consistent with the Trip Setpoint value. The omitted wording of CTS 2.2.1, Action b.2, is not necessary to ensure the requirement is met because it is redundant to CTS 3.0.2 (ITS LCO 3.0.2), which requires ACTIONS to be met when an LCO is not met. This change is designated as administrative because it does not result in technical changes to the CTS.	Table 3.3.1-1, footnote (g)	2.2.1, Action b.2
3.3.1 A15 3.3.1 A15 (continued)	CTS Table 4.3-1 specifies Channel Calibration requirements for Functional Unit 2.a, Power Range, Neutron Flux High Setpoint (ITS Function 2.a). The second and third Channel Calibrations listed for this functional unit represent the Incore-Axial Flux Difference (AFD) Channel Calibration (ITS SR 3.3.1.3) and the Incore-Excore Channel Calibration (ITS SR 3.3.1.6), as specified by Table 4.3-1 Notations (3) and (6), respectively. However, the ITS associates these SRs with the Overtemperature delta temperature (ΔT) Function (ITS Table 3.3.1-1, Function 5) since these calibrations are necessary to ensure proper operation of the Overtemperature ΔT Function. The Incore-Excore Channel Calibration requirement also includes Table 4.3-1 Notations (a) and (b) (ITS Table 3.3.1-1, Footnotes (b) and (c)). ITS SR 3.3.1.6 does not include application of ITS Table 3.3.1-1 Footnotes (b) and (c) to the Incore-Excore calibration requirement. This changes the CTS by omitting the reference to the subject footnotes from the ITS Table 3.3-1, Function 2.a, SR 3.3.1.6 requirement and associating the Incore-AFD calibration and Incore-Excore calibration with the Overtemperature ΔT Function.	Table 3.3.1-1, Function 5	Table 4.3-1, Functional Unit 2.a

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ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	This change is designated as administrative because it does not result in technical changes to the CTS.		
3.3.2 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS. This change is designated as administrative because it does not result in technical changes to the CTS.	3.3.2	3.3.2
3.3.2 A02 3.3.2 A02 (continued)	CTS 3.3.2 ACTION and CTS Table 3.3-3 provide the compensatory actions to take when Engineered Safety Feature Actuation System (ESFAS) instrumentation is inoperable. ITS 3.3.2 ACTIONS similarly provide the compensatory actions for inoperable ESFAS Instrumentation. ITS 3.3.2 ACTIONS are modified by a Note that allows separate Condition entry for each Function. In addition, due to the manner in which the Required Channel's description modifies ITS Functions 1.e, 1.f, 1.g, 4.a, 4.d, 4.e, 5.b, 6.b, 6.d, and 6.e, separate Condition entry is allowed within a Function as follows: Function 1.e (Safety Injection, High Differential Pressure Between the Steam Line Header and any Steam Line) on a per steam line basis; Function 1.f (Safety Injection, Steam Line Flow-High coincident with RCS average temperature minute RCS low temperature ($T_{avg-Low}$) on a per steam line or per loop basis; Function 1.g (Safety Injection, Steam Line Flow-High coincident with Steam Generator Pressure-Low) on a per steam line or per steam generator (SG) basis; Function 4.a (Steam Line Isolation, Manual Initiation) on a per steam line basis; Function 4.d (Steam Line Isolation, Steam Line Flow-High coincident with $T_{avg-Low}$) on a per steam line or per loop basis; Function 4.e (Steam Line Isolation, Steam Line Flow-High coincident with Steam Generator Pressure-Low) on a per steam line or per steam generator basis; Function 5.b (Feedwater Isolation, SG Water Level - High High (P-14)) on a per steam generator basis; Function 6.b (Auxiliary Feedwater, SG Water Level - Low Low) on a per steam generator basis; Function 6.d (Auxiliary Feedwater, Bus Stripping) on a per bus basis; and Function 6.e (Trip of all Main Feedwater Pumps) on a per pump basis. This changes the CTS by providing a specific	3.3.2 ACTIONS	3.3.2 Action Table 3.3-3

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	allowance to enter the ACTION for each inoperable ESFAS instrumentation Function and for certain Functions on a steam line, loop, steam generator, bus, or pump basis. This change is designated as administrative because it does not result in technical changes to the CTS.		
3.3.2 A03	CTS Table 3.3-2 specifies the "TOTAL NO. OF CHANNELS" and the "MINIMUM CHANNELS OPERABLE" associated with each ESFAS Functional Unit. CTS Table 3.3-2 ACTIONS specify three conditions of inoperable channels where action is required: 1) the number of OPERABLE channels one less than the Minimum Channels OPERABLE (ACTIONS 14, 16, 17, 19, 20, 22, and 23); 2) the number of OPERABLE channels one less that the Total Number of Channels (ACTIONs 15, 21, and 25); or 3) one channel inoperable (ACTIONs 26 and 27). ITS Table 3.3.2-1 supplies one column "Required Channels," that lists the number of channels required below which Action must be taken. The ITS "Required Channels" column value is the value used in CTS below which Action must be taken whether it is from the CTS Table 3.3-2 "Total NO. of Channels" column, or the "Minimum Channels OPERABLE" column as identified by the CTS Actions. This change is designated as administrative because it does not result in technical changes to the CTS.	Table 3.3.2-1	Table 3.3-2
3.3.2 A04 3.3.2 A04 (continued)	CTS Tables 3.3-2, 3.3-3, and 4.3-2 include Functional Unit 1.e, "Safety Injection - High Differential Pressure Between the Steam Line Header and any Steam Line." ITS Table 3.3.2-1 includes the same Functional Unit but labels it Function 1.e, "Safety Injection - High Differential Pressure Between the Steam Line Header and any Steam Generator." This changes the CTS by changing the label of the Steam Line Header pressure instruments to the SG pressure instruments. This change is designated as administrative because it does not result in technical changes to the CTS.	Table 3.3.2-1 Function 1.e	Tables 3.3-2, 3.3-3, and 4.3-2 Functional Unit 1.e

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 A05	CTS Table 3.3-2 Functional Units 1.f (Safety Injection, Steam Line Flow-High coincident with Steam Generator Pressure-Low or $T_{avg-Low}$), 4.a (Steam Line Isolation, Manual Initiation (individual)), 4.d (Steam Line Isolation, Steam Line Flow-High coincident with Steam Generator Pressure-Low or $T_{avg-Low}$), 5.c (Feedwater Isolation, Steam Generator Water Level— High-High), and 6.e (Auxiliary Feedwater, Trip of all Main feedwater Pumps Breakers), include the phrase; "/operating steam line," "in any two steam lines," "in any two loops," "in any operating steam generator," or "/operating pump," in the "MINIMUM CHANNELS OPERABLE" column. ITS Table 3.3.2-1 Functions 1.f, (Safety Injection, Steam Line Flow-High coincident or $T_{avg-Low}$), 1.g, (Safety Injection, Steam Line Flow-High coincident with Steam Generator Pressure-Low), 4.a (Steam Line Isolation, Manual Initiation), 4.d, (Steam Line Isolation, Steam Line Flow-High coincident with $T_{avg-Low}$), 4.e, (Steam Line Isolation, Steam Line Flow-High coincident with Steam Generator Pressure-Low), 5.b (Feedwater Isolation, SG Water Level - High High (P-14)), or 6.e (Auxiliary Feedwater, Trip of all Main Feedwater Pumps), "Required Channels" column does not contain this information. This changes the CTS by removing the phrases; "/operating steam line," "in any two steam lines," "in any two loops," "in any operating steam generator," or "/operating pump." This change is designated as administrative because it does not result in technical changes to the CTS.	Table 3.3.2-1 Functions 1.f, 1.g, 4.a, 4.d, 4.e, 5.b, 6.e	Table 3.3-2 Functional Units 1.f, 4.a, 4.d, 5.c, 6.e
3.3.2 A06 3.3.2 A06 (continued)	CTS Table 4.3-2, includes Note (1) that states, "Each train shall be tested in accordance with the Surveillance Frequency Control Program." CTS Table 4.32, Note (1) applies to CTS Table 4.3-2 Functional Units 1.b, 1.c, 2.a, 2.b, 3.a.2), 3.b.2), 3.b.3), 4.b, and 4.c, actuation logic tests. CTS 4.3.2.1 states that each ESFAS instrumentation channel and interlock and the automatic actuation logic and relays shall be demonstrated OPERABLE by performance of the ESFAS Instrumentation Surveillance Requirements specified in Table 4.3-2. CTS Table 4.3-2 states that the Surveillance Requirement (SR) Frequencies for these Functional Units is in accordance with the Surveillance Frequency Control Program (SFCP). ITS SR 3.3.2.2, "Perform ACTUATION LOGIC TEST," states that the Frequency is, "In accordance with the Surveillance Frequency Control Program." This changes the CTS by deleting Note (1) which is a redundant statement to the CTS Required Surveillance and the ITS stated Frequency.	SR 3.3.2.2	Table 4.3-2 Note (1)

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	This change is designated as administrative because it does not result in technical changes to the CTS.		
3.3.2 A07	CTS Table 4.3-2 includes a column designating the MODES that each Surveillance is required to be met. ITS Table 3.3.2-1 does not provide this specific column but includes this information in the Applicable MODES or other Specified Conditions column. This changes the CTS by combining the information in CTS Table 3.3-2, "Applicable Modes," and CTS Table 4.3-2 Modes for which Surveillance is Required," columns specifically stating when a Surveillance is required to be met into one table in ITS. This change is designated as administrative because it does not result in technical changes to the CTS.	Table 3.3.2-1	Table 4.3-2
3.3.2 A08	CTS Table 3.3-2, ACTION 21, states, in part, to take the ACTION required by Specification 3.7.1.5 when steam isolation channels are not restored within the designated Complete Time. This statement is unnecessary as LCO 3.0.6 (Safety Function Determination Program) provides the appropriate guidance and requirements relevant to inoperable TS support systems with respect to the potential impact on the associated TS supported system. This changes the CTS by removing this statement from CTS ACTION 21. This change is designated as administrative because the SFPD will ensure appropriate supported system Conditions and Required Actions are entered when necessary.	None	Table 3.3-2 Action 21
3.3.2 A09	CTS Table 3.3-3 includes two columns, Allowable Value and Trip Setpoint, for Functional Unit 6.d, "Auxiliary Feedwater – Bus Stripping." The value specified in these columns' states, "See Item 7. below for all Bus Stripping Allowable Values/Trip Setpoints," Item 7 below is the Loss of Power instruments. ITS states to see LCO 3.3.5, "[Loss of Power] LOP [emergency diesel generator] EDG Start Instrumentation," for Trip Setpoints. This changes the CTS by changing the direction provided to where the required setpoint values are located.	3.3.5	Table 3.3-3, Functional Unit 6.d

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	This change is designated as administrative because it does not result in technical changes to the CTS.		
3.3.2 A10 3.3.2 A10 (continued)	CTS 3.3.2 states that the ESFAS Instrumentation and Interlock Trip Setpoints shall be set consistent with the Trip Setpoint values shown in Table 3.3-3. CTS 3.3.2, Action a, states that with an ESFAS Instrumentation or Interlock Setpoint less conservative than the value shown in the Trip Setpoint column but more conservative than the value shown in the Allowable Value column of Table 3.3-3, adjust the setpoint consistent with the Trip setpoint value within permissible calibration tolerance. CTS 3.3.2, Action b, states with an ESFAS Instrumentation or Interlock Trip Setpoint less conservative than the value shown in the Allowable Value column of Table 3.3-3, either: 1) Adjust the Setpoint consistent with the Trip Setpoint value of Table 3.3-3 and determine within 12 hours that the affected channel is OPERABLE; or 2) Declare the channel inoperable and apply the applicable ACTION statement requirement of Table 3.3- 2 until the channel is restored to OPERABLE status with its setpoint adjusted consistent with the Trip Setpoint value. ITS LCO 3.3.2 requires the ESFAS instrumentation for each Function in Table 3.3.2-1 to be OPERABLE and incorporates the CTS actions related to trip setpoints as footnotes to Table 3.3.2-1. ITS Table 3.3.2-1, footnote (b), states, "The instrument channel setpoint shall be reset to a value within the calibration tolerance of the Trip Setpoint at the completion of the surveillance; otherwise, the channel shall be declared inoperable." ITS Table 3.3.2-1 footnote (c) states, "If the instrument channel setpoint is less conservative than the Allowable Value, the setpoint shall be reset consistent with the Trip Setpoint and within 12 hours determine the affected channel is OPERABLE; otherwise, the channel shall be declared inoperable." This changes the presentation of the CTS by incorporating the Action requirements associated with trip setpoints as footnotes to ITS Table 3.3.2-1 and simplifying wording.	None	3.3.2, Actions a and b

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	This change represents a presentation preference consistent with the presentation of the ISTS and usage rules of the ITS and is designated as administrative because it does not represent a technical change to the CTS.		
3.3.2 A11	CTS 3.3.2, Action b.2, states: "Declare the channel inoperable and apply the applicable ACTION statement requirement of Specification 3.3.2 until the channel is restored to OPERABLE status with its setpoint adjusted consistent with the Trip Setpoint value." ITS Table 3.3.2-1, footnote (c) does not include the clarifying statement to apply the applicable ACTION statement requirement of Specification 3.3.2 until the channel is restored to OPERABLE status with its setpoint adjusted consistent with the Trip Setpoint value. The omitted wording of CTS 3.3.2, Action b.2, is not necessary to ensure the requirement is met because it is redundant to CTS 3.0.2 (ITS LCO 3.0.2), which requires ACTIONS to be met when an LCO is not met. This change is designated as administrative because it does not result in technical changes to the CTS.	Table 3.3.2-1, footnote (c)	3.3.2 Action b.2
3.3.2 A12	CTS 3.3.2, Table 3.3-3, Functional Unit 1.e, "High Differential Pressure Between the Steam Line Header and any Steam Line," Allowable Value is listed as ≤ 114 pounds per square inch gauge (psig). ITS LCO 3.3.2, Table 3.3.2-1, Function 1.e, "High Differential Pressure Between the Steam Line Header and any Steam Generator," Allowable Value is listed as ≤ 114 psi. This changes the CTS by removing the reference to 'gauge (g)' in the limit's units. This change is considered administrative because it is correcting a typographical error, providing no technical changes.	Table 3.3.2-1, Function 1.e	Table 3.3-3 Functional Unit 1.e
3.3.2 A13	CTS 3.3.2, Table 3.3-3, Functional Unit 6, "Auxiliary Feedwater," includes Note (3). CTS Functional Unit 6, Note (3) states that Auxiliary feedwater manual initiation is included in Specification 3.7.1.2. ITS Table 3.3.2-1, Function 6, does not include this Note. This changes the CTS by excluding an informational Note stating where a requirement is contained.	None	Table 3.3-3 Functional Unit 6, Note (3)

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	This change is designated as administrative because it does not result in technical changes to the CTS.		
3.3.3 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.3.3	3.3.3.3
3.3.3 A02	CTS 4.3.3.3 states the defined test requirements (Channel Check and Channel Calibration) at the frequencies shown in Table 4.3-4. ITS 3.3.3 Surveillance Requirements (SRs) consist of two separate surveillances, SR 3.3.3.1 (Channel Check) and SR 3.3.3.2 (Channel Calibration). A note precedes the ITS surveillances and specifies the applicability of the surveillances to each Post Accident Monitoring (PAM) Function. This changes CTS by presenting the SRs in two distinct surveillance requirements. This change is designated as an administrative change as it does not result in technical changes to the CTS.	SR 3.3.3.1 SR 3.3.3.2	4.3.3.3
3.3.3 A03 3.3.3 A03 (continued)	CTS Table 3.3-5 contain a column that specifies the applicable Action(s) for each instrument listed in the Table. The corresponding column in ITS Table 3.3.3-1 specifies the applicable Action Condition referenced from Required Action D.1. This changes the CTS by replacing the CTS table column specifying the applicable Actions for each PAM instrument with the ITS Table column specifying only the Action referenced from Required Action D.1 for each PAM Function. As the proposed change is the result of changes in the format and presentation of the PAM requirements, it is designated administrative.	Table 3.3.3-1	Table 3.3-5

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.3.3 A04	The title of CTS 3.3.3.3, "Accident Monitoring Instrumentation," is revised to "Post Accident Monitoring (PAM) Instrumentation." The CTS Limiting Condition for Operation (LCO) operability requirement and Actions are revised from referencing instrument "Channels" to referencing instrument "Functions." The requirements for each PAM instrument (Function) listed in CTS Table 3.3-5 are further revised to specify the "Required Channels" for each instrument Function. In addition, the CTS reference to "Minimum Channels Operable" and "Applicable Modes" on Table 3.3-5 is deleted. The proposed changes are consistent with the presentation of this information in the corresponding ITS 3.3.3, "Post Accident Monitoring (PAM) Instrumentation." As the proposed change is the result of changes in the format and presentation of the PAM requirements, it is designated administrative.	3.3.3	3.3.3.3 and Table 3.3-5
3.3.3 A05	The CTS PAM requirement for Core Exit Temperature consists of specifying 4 core exit thermocouples (CETs) per core quadrant. The ITS presents this requirement differently. The corresponding ITS requirement for CETs specifies two Required Channels for each core quadrant and lists each quadrant separately. In addition, the ITS requirement for two channels is modified by footnote (c) that requires each channel to contain two CETs. The CTS is revised to conform to the ITS. This changes the CTS by revising the presentation of the Core Exit Temperature Function to be stated in terms of "Required Channels." This change is designated as an administrative change as it does not result in technical changes to the CTS.	Table 3.3.3-1 Functions 14, 15, 16, 17	Table 3.3-5 Instrument 14
3.3.3 A06 3.3.3 A06 (continued)	CTS 3.3.3.3 Actions 31 and 37 address a single inoperable channel in one or more PAM Functions. If the affected channel is not restored to operable status within 30 days, CTS requires the submittal of a special report to the Commission within the next 14 days pursuant to Specification 6.9.2. The requirement to submit a special report includes detail that is addressed as an administrative requirement in Specification 6.9.2 (ITS 5.6.4) and is replaced with ITS ACTION B which requires initiation of action in accordance with Specification 5.6.4 immediately. Specification 5.6.4 requires a report to be submitted to the NRC outlining the preplanned alternate method of monitoring, the	3.3.3 ACTION B	3.3.3.3 Actions 31 and 37

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status. This change is designated as an administrative change as it does not result in technical changes to the CTS.		
3.3.3 A07	Not used.	N/A	N/A
3.3.3 A08	CTS Table 3.3-5, Actions 37 and 38 require, in part, restoring the Reactor Vessel Level Monitoring System (CTS Table 3.3-5, Function 16) channels to OPERABLE status within 30 days and 7 days, depending on the number of inoperable channels. If repairs are not feasible without shutting down, these actions also require preparing and submitting a Special Report to the Commission pursuant to Specification 6.9.2 within the next 14 days. ITS 3.3.3 ACTIONS require the same time to restore inoperable Reactor Vessel Level Monitoring System (ITS Table 3.3.3-1, Function 6) channels to OPERABLE status and if not restored within the associated Completion Time, immediately initiate action in accordance with Specification 5.6.4 (i.e., prepare and submit a report to the NRC within 14 days). ITS 3.3.3 ACTIONS to do not include the caveat of whether repairs are feasible. This changes the CTS by removing this caveat detail in meeting the Action requirement. This change is designated administrative because it removes unsound detail and does not introduce a technical change to the CTS.	3.3.3 ACTIONS	Table 3.3-5, Actions 37 and 38
3.3.4 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.3.4	3.3.2

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.3.4 A02	CTS 3.3.2, Table 3.3-2 Function 9, contains sub-functions that initiate Control Room Emergency Ventilation System (CREVS). These sub-functions also are part of other Functions that also initiate those Functions. In this case the requirements for these sub-functions such as the number of channels required, Surveillance Requirements (SRs), Modes of Applicability, etc. are located in those Functions and are being referenced in the CREVS ITS. Specifically, the Control Room Air Intake Radiation sub-function for CREVS will be listed only. The Containment Isolation and Safety Injection sub-functions that initiates CREVS are located in ITS Table 3.3.2-1, "Engineered Safety Features Actuation System Instrumentation." This changes the CTS by not including the requirements for the sub-functions in the CREVS Table but referencing the ESFAS Tables. This change is designated as administrative because it does not result in technical changes to the CTS.	Table 3.3.2-1	3.3.2, Table 3.3-2
3.3.4 A03	CTS 3.3.2 Table 3.3-2 Function 9, CREVS, does not contain a specific ACTION if the Required Action and associated Completion Times cannot be met during movement of irradiated fuel assemblies within containment. ITS 3.3.4 ACTION D requires suspending movement of irradiated fuel assemblies within containment when the Required Action and associated Completion Times cannot be met during movement of irradiated fuel assemblies within containment. This changes the CTS by adding a specific Action when the Required Action and associated Completion Times cannot be met during movement of irradiated fuel assemblies within containment. Actions taken in both ITS and CTS, although specifically stated in ITS, would be equivalent, this change is considered Administrative because no technical changes are being made.	3.3.4 ACTION D	Table 3.3-2
3.3.4 A04	CTS 3.3.2 ACTION and CTS Table 3.3-1 provide the compensatory actions to take when Reactor Trip System (RTS) instrumentation is inoperable. ITS 3.3.1 ACTIONS similarly provide the compensatory actions for inoperable RTS Instrumentation. ITS 3.3.1 ACTIONS are modified by a Note that allows separate Condition entry for each	3.3.1 ACTIONS	3.3.2 Action

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	Function. In addition, due to the manner in which the Required Channel's description modifies ITS Functions, separate Condition entry is allowed within a Function. This changes the CTS by providing a specific allowance to enter the ACTION for each inoperable RTS instrumentation Function and for certain Functions on a loop, SG, bus, or breaker, etc. This change is designated as administrative because it does not result in technical changes to the CTS.		
3.3.4 A05	CTS Table 3.3-2 ACTION 24A states, in part, to either restore the inoperable channel to OPERABLE status or place the Control Room Emergency Ventilation System in the recirculation mode. ITS 3.3.4 ACTION A does not contain the statement to restore the inoperable channel to OPERABLE status. This changes CTS by not including the statement to restore the channel to OPERABLE status. This change is designated as administrative because it does not result in technical changes to the CTS.	3.3.4 ACTION A	Table 3.3-2 Action 24A
3.3.4 A06	CTS 3.3.2 states that the ESFAS Instrumentation and Interlock Trip Setpoints shall be set consistent with the Trip Setpoint values shown in Table 3.3-3. CTS 3.3.2, Action a, states that with an ESFAS Instrumentation or Interlock Setpoint less conservative than the value shown in the Trip Setpoint column but more conservative than the value shown in the Allowable Value column of Table 3.3-3, adjust the setpoint consistent with the Trip setpoint value within permissible calibration tolerance. CTS 3.3.2, Action b, states with an ESFAS Instrumentation or Interlock Trip Setpoint less conservative than the value shown in the Allowable Value column of Table 3.3-3, either: 1) Adjust the Setpoint consistent with the Trip Setpoint value of Table 3.3-3 and determine within 12 hours that the affected channel is OPERABLE; or 2) Declare the channel inoperable and apply the applicable ACTION statement requirement of Table 3.3-2 until the channel is restored to OPERABLE status with its setpoint adjusted consistent with the Trip Setpoint value. ITS LCO 3.3.4 requires the CREVS instrumentation for each Function in Table 3.3.4-1 to be OPERABLE and incorporates the CTS actions related to trip setpoints as footnotes to Table 3.3.4-1. ITS Table 3.3.4-1, footnote (b), states, "The instrument channel setpoint	None	3.3.2, Actions a and b

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	shall be reset to a value within the calibration tolerance of the Trip Setpoint at the completion of the surveillance; otherwise, the channel shall be declared inoperable." ITS Table 3.3.4-1 footnote (c) states, "If the instrument channel setpoint is less conservative than the Allowable Value, the setpoint shall be reset consistent with the Trip Setpoint and within 12 hours determine the affected channel is OPERABLE; otherwise, the channel shall be declared inoperable." This changes the presentation of the CTS by incorporating the Action requirements associated with trip setpoints as footnotes to ITS Table 3.3.4-1 and simplifying wording. This change represents a presentation preference consistent with the presentation of the ISTS and usage rules of the ITS and is designated as administrative because it does not represent a technical change to the CTS.		
3.3.4 A07	CTS 3.3.2, Action b.2, states: "Declare the channel inoperable and apply the applicable ACTION statement requirement of Specification 3.3.2 until the channel is restored to OPERABLE status with its setpoint adjusted consistent with the Trip Setpoint value." ITS Table 3.3.4-1, footnote (c), does not include the clarifying statement to apply the applicable ACTION statement until the channel is restored to OPERABLE status with its setpoint adjusted consistent with the Trip Setpoint value. The omitted wording of CTS 3.3.2, Action b.2, is not necessary to ensure the requirement is met because it is redundant to CTS 3.0.2 (ITS LCO 3.0.2), which requires ACTIONS to be met when an LCO is not met. This change is designated as administrative because it does not result in technical changes to the CTS.	None	3.3.2 Action b.2
3.3.5 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.3.5	3.3.2

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.3.5 A02	CTS 3.3.2.1, "Engineered Safety Feature Actuation System Instrumentation," requires the Engineered Safety Feature Actuation System (ESFAS) instrumentation channels and interlocks shown in Table 3.3-3 to be OPERABLE. ITS 3.3.5, "Loss of Power (LOP) Emergency Diesel Generator (EDG) Start Instrumentation," requires specific channels for the Loss of Voltage, Undervoltage, and Degraded Voltage Functions to be OPERABLE without any interlock channels. This changes the CTS by having a separate Specification for the LOP EDG Start Instrumentation in lieu of including it with the ESFAS Instrumentation Specification. This change is designated as administrative because it does not result in a technical change to the CTS.	3.3.5	3.3.2
3.3.5 A03	CTS 3.3.2.1 provides the compensatory actions to take when LOP instrumentation is inoperable. ITS 3.3.5 provides the compensatory actions for inoperable LOP EDG start instrumentation. The ITS 3.3.5 ACTIONS include a Note that allows separate Condition entry for each Function. This modifies the CTS by providing a specific allowance to enter the Action for each inoperable LOP EDG Start Instrumentation Function. This change is designated as administrative because it does not result in a technical change to the CTS.	3.3.5 ACTIONS	3.3.2 Action
3.3.5 A04 3.3.5 A04 (continued)	CTS 3.3.2 includes the list of associated LOP instrumentation required to be OPERABLE and associated Applicability and Actions in table format (Table 3.3-2). ITS 3.3.5 does not contain a table. This changes the CTS by adopting the ISTS format for the associated Applicability and Actions in lieu of the CTS table format. The CTS list of functions, allowable values, and Surveillance Requirements (SRs) are maintained in table format. This change is designated as administrative because it does not result in a technical change to the CTS.	3.3.5	3.3.2
3.3.5 A05	CTS Table 4.3-2, includes Note (1) that states, "Each train shall be tested in accordance with the Surveillance Frequency Control Program." CTS Table 4.32, Note (1) applies to CTS Table 4.3-2 Functional Units 7.b, and 7.c Trip Actuating Device Operational Tests (TADOT). CTS 4.3.2.1 states that each ESFAS instrumentation channel and interlock	SR 3.3.5.2	Table 4.3-2 Note 1

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	and the automatic actuation logic and relays shall be demonstrated OPERABLE by performance of the ESFAS Instrumentation SRs specified in Table 4.3-2. CTS Table 4.3-2 states that the SRs for these Functional Units is in accordance with the Surveillance Frequency Control Program (SFCP). ITS SR 3.3.5.2, "Perform TADOT," states that the Frequency is, "In accordance with the Surveillance Frequency Control Program." This changes the CTS by deleting Note (1) which is a redundant statement to the CTS required surveillance and the ITS stated Frequency. This change is designated as administrative because it does not result in a technical change to the CTS.		
3.3.5 A06	CTS Tables 3.3-2, 3.3-3, and 4.3-2 contain the requirements for the Safety Injection (SI) Functional Units (Functional Units 1.a through 1.f). ITS 3.3.5 does not include the Functional Unit requirements of the safety injection (SI) signal. This changes the CTS by not including the SI Functional Unit requirements in Table 3.3.5-1. This change is designated as administrative because it does not result in a technical change to the CTS.	3.3.2	Tables 3.3-2, 3.3-3, and 4.3-2
3.3.5 A07 3.3.5 A07 (continued)	CTS Tables 3.3-2, ACTION 18 permits removing both channels of protective relaying on a given bus for the purpose of surveillance testing for up to 8 hours, provided this is limited to only one bus at a time. This allowance is adopted as a Note to Required Action B.1 of ITS 3.3.5, which is associated with two channels of relaying being inoperable on a given bus. In addition, the ITS term "bypassed" is being retained in lieu of the CTS phrase "out of service" with respect to the removal of a channel from operation. This change is designated as administrative because it does not result in a technical change to the CTS.	3.3.5 Required Action B.1 Note	Tables 3.3-2 Action 18
3.3.5 A08	CTS Table 3.3-2 and ITS 3.3.5 require the EDG LOP functions to be OPERABLE in MODES 1, 2, 3, and 4 consistent with the Applicability of CTS 3.8.1.1. Because the ITS separates the EDG LOP functions for the ESFAS requirements of ITS 3.3.2, the CTS LCO is modified to clearly state that the OPERABILITY of the LOP functions are directly	3.3.5	3.3.2

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	associated with the EDGs required to be OPERABLE per LCO 3.8.1, "AC Sources – Operating." This changes the CTS by providing clarification with respect to EDG LOP OPERABILITY requirements. This change is designated as administrative because it does not result in a technical change to the CTS.		
3.3.5 A09 3.3.5 A09 (continued)	CTS 3.3.2 requires that the Engineered Safety Features Actuation System (ESFAS) instrumentation channels and interlocks shown in Table 3.3-2 be OPERABLE with their Trip Setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3-3. Included in CTS Tables 3.3-2 and 3.3-3 are three instrument groups associated with Function 7, "Loss of Power:" Function 7.a, 4.16 kV Busses A and B (Loss of Voltage); Function 7.b, 480 V Load Centers 3A, 3B, 3C, 3D and 4A, 4B, 4C, 4D Undervoltage; Function 7.c, 480 V Load Centers 3A, 3B, 3C, 3D and 4A, 4B, 4C, 4D Degraded Voltage. In addition, CTS Table 3.3-3, Functions 7.a, 7.b, and 7.c, Allowable Value column includes footnote # that states, "If no Allowable Value is specified, as indicated by [ ], the trip setpoint shall also be the allowable value." The Allowable Value for CTS Table 3.3-3, Function 7.a is listed as N.A. The Allowable Value for CTS Table 3.3-3, Functions 7.b and 7.c contain [ ]. ITS LCO 3.3.5 requires two channels per bus of the LOP EDG start instrumentation for each Function in Table 3.3.5-1 to be OPERABLE. ITS Table 3.3.5-1 lists the Functions associated with CTS Table 3.3-3 Functions 7.a, 7.b, and 7.c, as Functions 1, 2, and 3, respectively, with the column designated as Trip Setpoint. This changes the CTS by designating only a Trip Setpoint column for the LOP EDG Start Functions; Function 1, Loss of Voltage; Function 2, Undervoltage; and Function 3, Degraded Voltage, eliminating the Allowable Value column and the # footnote. This change is designated as administrative because it does not result in a technical change to the CTS.	Table 3.3.5-1 Functions 1, 2 and 3	Table 3.3-3 Functions 7.a, 7.b, and 7.c
3.3.6 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.3.6	3.3.2 3.3.3.1

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.3.6 A02	CTS Table 3.3-2 specifies the "TOTAL NO. OF CHANNELS" and the "MINIMUM CHANNELS OPERABLE" associated with each Engineered Safety Feature Actuation System (ESFAS) Functional Unit. CTS Table 3.3-2 ACTION 18 specifies that where action is required is when the number of OPERABLE channels one less than the Minimum Channels OPERABLE. ITS Table 3.3.6-1 supplies one column "Required Channels," that lists the number of channels required below which Action must be taken. The ITS "Required Channels" column value is the value used in CTS below which Action must be taken whether it is from the CTS Table 3.3-2 "Minimum Channels OPERABLE" column as identified by the CTS Action. This change is designated as administrative because it does not result in technical changes to the CTS.	Table 3.3.6-1	Table 3.3-2
3.3.6 A03 3.3.6 A03 (continued)	CTS Table 3.3-2 identifies that two Containment Radioactivity – High channels are listed in the "Total No. of Channels" column with the "Minimum Channels Operable" column identifying one channel. CTS Table 3.3-2, "Total No. of Channels," column for the Containment Radioactivity – High Function is modified by a Note stating that the Channels are for particulate radioactivity and for gaseous radioactivity stating that either an OPERABLE particulate radioactivity or gaseous radioactivity channel will satisfy the Minimum Channels OPERABLE requirement." CTS Action 16 states that with the number of OPERABLE channels less than the Minimum Channels OPERABLE requirement, operation may continue provided the Containment purge supply, exhaust, and instrument air bleed valves are maintained closed. Therefore, in CTS, with an OPERABLE Gaseous or Particulate Radioactive monitoring channel operation may continue indefinitely. ISTS 3.3.6 Action A requires that with one radioactivity monitor inoperable, the channel must be restored to OPERABLE status within 4 hours. ITS 3.3.6 Action B addresses two inoperable radioactivity monitors when operating in MODES 1, 2, 3, or 4. Required Action B.1 refers to ISTS 3.6.3, "Containment Isolation Valves," for containment purge supply and exhaust valves made inoperable by the associated instrumentation. ITS SR 3.6.3.1 requires the containment purge supply and exhaust valves to be maintained closed in MODES 1, 2, 3, and 4, but does not address the instrument air bleed valves. Therefore, ITS Required Action B.1 is modified to address only the instrument air bleed valves. Since the CTS requires only one of the radioactivity	3.3.6 Action B	Table 3.3-2

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	channels to be operable (gaseous or particulate), ITS 3.3.6 Action A is not adopted, and ITS Action B is modified according to CTS requirements. With ISTS ACTION A omitted, the statements in ISTS Conditions B and C regarding not meeting the Required Action and Completion Time of Condition A are also omitted. This change is designated as administrative because it does not result in technical changes to the CTS.		
3.3.6 A04 3.3.6 A04 (continued)	CTS 3.3.3.1, "Radiation Monitoring for Plant Operations," ACTION c states that the provisions of Specification 3.0.3 are not applicable. This exception does not exist in ITS 3.3.6. Specification 3.0.3 is applicable in MODES 1, 2, 3, and 4, and establishes remedial actions when a Specification provides no action for a given plant configuration or when a loss of safety function exists. The radiation monitors required to be OPERABLE per CTS 3.3.3.1 are the same as those required by CTS 3.3.2, "Engineered Safety Features Actuation System (ESFAS) Instrumentation." With respect to CTS 3.3.2, the monitors are associated with the Containment Isolation function and, therefore, are required to be OPERABLE in MODES 1, 2, 3, and 4. Because the radiation monitors associated with CTS 3.3.3.1 and the Containment Isolation function of CTS 3.3.2 are the same, it is not appropriate to exempt Specification 3.0.3. Therefore, CTS 3.3.3.1 ACTION c is not being retained in ITS 3.3.6. This change is designated as administrative because it does not result in technical changes to the CTS.	None	3.3.3.1 Action c
3.3.6 A05	CTS Table 3.3-4 ACTION 27 requires compliance with CTS 3.9.9 (Containment Ventilation Isolation System) and CTS 3.9.13 (Radiation Monitoring) when both the gaseous and particulate containment radiation monitors are inoperable in MODE 5 or 6. When the Containment Ventilation Isolation System is inoperable (which may be a result of both containment radiation monitors being inoperable), the Actions of CTS 3.9.9 and 3.9.13 require isolating affected containment ventilation penetrations. ITS 3.3.6, Required Action C.1 requires isolation of the containment ventilation system penetrations if both radioactivity monitors are inoperable, or with one or more Functions with one or more manual or automatic actuation trains inoperable. ITS 3.9.4, "Containment Penetrations," Part 3.9.4.c.1 allows these penetrations to be isolated in lieu of being	3.3.6 Required Action B.1	Table 3.3-4 Action 27

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	capable of being closed by the Containment Ventilation Isolation System as one method of meeting the LCO. If the valves are not closed in accordance with LCO 3.9.4.c.a or capable of being closed in accordance with LCO 3.9.4.c.2 (i.e., LCO not met), ITS 3.9.4, Required Action A.1 requires suspension of movement of recently irradiated fuel assemblies within containment (i.e., exiting the Mode of Applicability). Because ITS 3.9.4 ensures the subject valves are either closed, capable of being closed, or the movement of recently irradiated fuel terminated, ITS 3.3.6, Required Action C.1 is omitted and CTS Table 3.3-4, ACTION 27, is simplified in ITS 3.3.6 by requiring direct entry into ITS 3.9.4 when both containment radiation monitors are inoperable. This change is designated as administrative because it does not result in technical changes to the CTS.		
3.3.6 A06 3.3.6 A06 (continued)	CTS 3.3.2 ACTION and CTS Table 3.3-1 provide the compensatory actions to take when Engineered Safety Feature Actuation System (ESFAS) instrumentation is inoperable. ITS 3.3.6 ACTIONS similarly provide the compensatory actions for inoperable ESFAS instrumentation, specifically the containment ventilation isolation instrumentation. ITS 3.3.6 ACTIONS are modified by a Note that allows separate Condition entry for each Function. This changes the CTS by providing a specific allowance to enter the ACTION for each inoperable containment ventilation isolation function. This change is designated as administrative because it does not result in technical changes to the CTS.	3.3.6 ACTIONS	3.3.2 Action Table 3.3-1
3.3.6 A07	CTS 3.3.2 states that the ESFAS Instrumentation and Interlocks shall be set consistent with the Trip Setpoint values shown in Table 3.3-3. CTS 3.3.2, Action a, states that with an ESFAS Instrumentation or Interlock Trip Setpoint less conservative than the value shown in the Trip Setpoint column but more conservative than the value shown in the Allowable Value column of Table 3.3-3, adjust the setpoint consistent with the Trip setpoint value within permissible calibration tolerance. CTS 3.3.2, Action b, states with an ESFAS Instrumentation or Interlock Trip Setpoint less conservative than the value shown in the Allowable Values column of Table 3.3-3, either: 1) Adjust the Setpoint consistent with the Trip Setpoint value of Table 3.3-3 and determine within 12 hours that the affected channel is OPERABLE; or 2) Declare the channel inoperable and apply the	None	3.3.2, Actions a and b

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.3.6 A07 (continued)	applicable ACTION statement requirement of Table 3.3-2 until the channel is restored to OPERABLE status with its setpoint adjusted consistent with the Trip Setpoint value. CTS 3.3.3.1 states that the radiation monitoring instrumentation channels for plant operations shown in Table 3.3-4 shall be OPERABLE with their Alarm/Trip Setpoints within the specified limits. CTS 3.3.3.1, Action a, states that with a radiation monitoring channel Alarm/Trip Setpoint for plant operations exceeding the value shown in Table 3.3-4, adjust the Setpoint to within the limit within 4 hours or declare the channel inoperable (refer to ITS 3.3.6, DOC L04 for discussion related to the 4-hour requirement). ITS Limiting Condition for Operation (LCO) 3.3.6 requires the Containment Ventilation Isolation instrumentation for each Function in Table 3.3.6-1 to be OPERABLE and incorporates the CTS actions related to trip setpoints as footnotes to Table 3.3.6-1. ITS Table 3.3.6-1, footnote (d), states, "The instrument channel setpoint shall be reset to a value within the calibration tolerance of the Trip Setpoint at the completion of the surveillance; otherwise, the channel shall be declared inoperable." ITS Table 3.3.6-1 footnote (e) states, "If the instrument channel setpoint is less conservative than the Allowable Value, the setpoint shall be reset consistent with the Trip Setpoint and within 12 hours determine the affected channel is OPERABLE; otherwise, the channel shall be declared inoperable." This changes the presentation of the CTS by incorporating the Action requirements associated with trip setpoints as footnotes to ITS Table 3.3.6-1 and simplifying wording. This change represents a presentation preference consistent with the presentation of the ISTS and usage rules of the ITS and is designated as administrative because it does not represent a technical change to the CTS.		
3.3.6 A08	CTS 3.3.2, Action b.2, states: "Declare the channel inoperable and apply the applicable ACTION statement requirement of Table 3.3-2 until the channel is restored to OPERABLE status with its setpoint adjusted consistent with the Trip Setpoint value." ITS Table 3.3.6-1, footnote (e), does not include the clarifying statement to apply the applicable ACTION statement until the channel is restored to OPERABLE status with its	None	3.3.2 Action b.2

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	setpoint adjusted consistent with the Trip Setpoint value. The omitted wording of CTS 3.3.2, Action b.2, is not necessary to ensure the requirement is met because it is redundant to CTS 3.0.2 (ITS LCO 3.0.2), which requires ACTIONS to be met when an LCO is not met. This change is designated as administrative because it does not represent a technical change to the CTS. This change is designated as administrative because it does not result in technical changes to the CTS.		
Refer to DOC section in ML23151A447	Section 3.4, Reactor Coolant System (RCS)		
3.4.1 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.4.1	3.2.5
3.4.1 A02	CTS 3.2.5 ACTION requires the unit to reduce THERMAL POWER to “less than” 5% of RATED THERMAL POWER within the next 4 hours if the Departure from Nucleate Boiling (DNB) parameters are not restored to within limit in 2 hours. ITS 3.4.1 ACTION B requires the power reduction to “less than or equal to” 5% RATED THERMAL POWER (RTP) (MODE 2) within the next 6 hours if the DNB parameters are not restored to within limit in 2 hours. This changes the CTS by allowing the unit to be at 5% RTP instead of < 5% RTP. The change in the time period to reach 5% RTP is discussed in DOC 3.4.1 L01. This change is designated as administrative as it results in no technical change to the CTS.	3.4.1 ACTION B	3.2.5 Action

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.4.1 A03	CTS 4.2.5.4 requires a precision heat balance to determine RCS flow rate following each fuel loading after exceeding 90% RTP and states "The provisions of 4.0.4 are not applicable for performing the precision heat balance flow measurement." ITS Surveillance Requirement (SR) 3.4.1.4 does not contain this statement. However, ITS SR 3.4.1.4 contains a Note that states, "Not required to be performed until 24 hours after ≥ 90% RTP." This changes the CTS by not adding the CTS 4.0.4 exception. This change is designated as administrative as it results in no technical change to the CTS.	SR 3.4.1.4	4.2.5.4
3.4.1 A04	CTS 4.2.5.3 requires that the indicators which are used to determine RCS flow rate be subjected to a CHANNEL CALIBRATION at least once per 18 months. ITS 3.4.1 does not include this surveillance requirement. This changes the CTS by deleting CTS SR 4.2.5.3. This change is designated as administrative as it results in no technical change to the CTS.	3.4.1	4.2.5.3
3.4.2 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS. This change is designated as administrative as it results in no technical change to the CTS.	3.4.2	3.1.1.4
3.4.2 A02	The Applicability of CTS 3.1.1.4 is modified by Footnote **, which states "See Special Test Exception 3.10.3." The ITS 3.4.2 Applicability does not contain the footnote or a reference to the Special Test Exception. This change is designated as administrative as it results in no technical change to the CTS.	3.4.2	3.1.1.4

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.4.2 A03	CTS 3.1.1.4 ACTION states, in part, “restore Tavg to within its limit within 15 minutes or be in HOT STANDBY within the next 15 minutes,” when the RCS loop average temperature is not within limit. ITS 3.4.2 requires the unit to be in MODE 2 with k_{eff} < 1.0 within 30 minutes. This changes the CTS by eliminating the requirement to restore T_{avg} within 15 minutes but retains the overall time limit of 30 minutes to be outside the mode of applicability. The change from HOT STANDBY to MODE 2 with k_{eff} < 1.0 is discussed in DOC 3.4.1 A04. This change is designated as administrative as it results in no technical change to the CTS.	3.4.2	3.1.1.4 Action
3.4.2 A04	CTS 3.1.1.4 ACTION states that with an RCS operating loop temperature (T_{avg}) < 541 °F, restore Tavg to within its limit within 15 minutes or “be in HOT STANDBY within the next 15 minutes.” ITS 3.4.2, ACTION A, states that with T_{avg} in one or more RCS loops not within limit, be in MODE 2 with k_{eff} < 1.0 within 30 minutes. This changes the CTS from requiring entry into HOT STANDBY to requiring entry into MODE 2 with k_{eff} < 1.0. Other changes to this CTS Action are discussed in DOC 3.4.1 L01. This change is designated as administrative as it results in no technical change to the CTS.	3.4.2 ACTION A	3.1.1.4 Action
3.4.3 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS. This change is designated as administrative as it results in no technical change to the CTS.	3.4.3	3.4.9.1
3.4.4 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.4.4	3.4.1.1

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.4.4 A02	CTS 3.4.1.1 states that all reactor coolant loops shall be in operation. ITS 3.4.4 states that three RCS loops shall be OPERABLE and in operation. This changes the CTS by requiring the RCS loops to be OPERABLE. This change is designated as administrative as it results in no technical change to the CTS.	3.4.4	3.4.1.1
3.4.5 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.4.5	3.4.1.2
3.4.5 A02	Not used.	N/A	N/A
3.4.5 A03	CTS 3.4.1.2 c states, in part, “immediately initiate corrective action to return the required reactor coolant loop to operation.” ITS 3.4.5 ACTION D.3 states “Initiate action to restore one RCS loop to OPERABLE status and operation.” This changes the CTS by requiring the loop in operation to also be OPERABLE. This change is designated as administrative as it results in no technical change to the CTS.	3.4.5 Required Action D.3	3.4.1.2 Action c
3.4.5 A04	ITS 3.4.5 ACTION D.1 states “Place the Rod Control System in a condition incapable of rod withdrawal” when no required loops are OPERABLE or in operation. CTS 3.4.1.2 ACTION c, when no loops are in operation, does not contain this action. However, CTS 3.4.1.2 b requires the reactor trip breakers (RTBs) to be opened (see L02 for the discussion from CTS requiring opening the RTBs to the ITS requiring placing the Rod Control System in a condition incapable of rod withdrawal). This changes the CTS by placing the Rod Control System in a condition incapable of rod withdrawal. This change is designated as administrative as it results in no technical change to the CTS.	3.4.5 Required Action D.1	3.4.1.2 Action c

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.4.5 A05	When the Rod Control System is capable of rod withdrawal, CTS 3.4.1.2 ACTION b requires the RTBs to be opened within 1 hour, if two required RCS loops are not OPERBLE or two are not in operation. ITS 3.4.5 Condition C contains a similar Action but also provides an option to restore an RCS loop to operation (ACTION C.1) in lieu of opening the RTBs. This changes the CTS by adding an option to restore an RCS loop to operation. This change is designated as administrative as it results in no technical change to the CTS.	3.4.5 Condition C	3.4.1.2 Action b
3.4.6 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.4.6	3.4.1.3
3.4.6 A02	Not used.	N/A	N/A
3.4.6 A03	CTS 3.4.1.3 b states, in part, “immediately initiate corrective action to return the required reactor coolant loop to operation.” ITS 3.4.6 ACTION B.2 states “Initiate action to restore one RCS loop to OPERABLE status and operation.” This changes the CTS by requiring the loop to be OPERABLE as well as be in operation. This change is designated as administrative as it results in no technical change to the CTS.	3.4.6 Required Action B.2	3.4.1.3 Action b
3.4.6 A04	CTS 3.4.1.3 ACTION b, in part, requires immediately initiating corrective action to return “the required” loop to operation. ITS 3.4.6 ACTION b requires essentially the same Action but requires restoration of “one” loop to operation. This changes the CTS by changing “the required” to “one” when referring to returning the loop to operation. This change is designated as administrative as it results in no technical change to the CTS.	3.4.6 ACTION B	3.4.1.3 Action b

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.4.7 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.4.7	3.4.1.4.1
3.4.7 A02	CTS 3.4.1.4.1 ACTION b states, "With no RHR loop in operation..." ITS 3.4.7 Action C states "No required RHR loops OPERABLE OR Required RHR loop not in operation." This changes the CTS by adding an additional condition for the Action that no required Residual Heat Removal (RHR) loop OPERABLE. This change is designated as administrative as it results in no technical change to the CTS.	3.4.7 ACTION C	3.4.1.4.1 Action b
3.4.7 A03	CTS 3.4.1.4.1 Action b states, in part, "immediately initiate corrective action to return the required reactor coolant loop to operation." ITS 3.4.7 ACTION C.2 states "Initiate action to restore one RCS loop to OPERABLE status and operation." This changes the CTS by requiring the loop to be OPERABLE as well as be in operation. This change is designated as administrative as it results in no technical change to the CTS.	3.4.7 Required Action C.2	3.4.1.4.1 Action b
3.4.7 A04	CTS 3.4.1.4.1 Action b, in part, requires immediately initiating corrective action to return "the required" loop to operation. ITS 3.4.7 ACTION C requires essentially the same Action but requires restoration of "one" loop to operation. This changes the CTS by changing "the required" to "one" when referring to returning the loop to operation. This change is designated as administrative as it results in no technical change to the CTS.	3.4.7 ACTION C	3.4.1.4.1 Action b

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.4.8 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.4.8	3.4.1.4.2
3.4.8 A02	CTS 3.4.1.4.2 ACTION b states, “With no RHR loop in operation...” ITS 3.4.8 Action B states “No required RHR loops OPERABLE OR Required RHR loop not in operation.” This changes the CTS by adding an additional condition for the Action that no required Residual Heat Removal (RHR) loop OPERABLE. This change is designated as administrative as it results in no technical change to the CTS.	3.4.8 ACTION B	3.4.1.4.2 Action b
3.4.8 A03	CTS 3.4.1.4.2 Action b states, in part, “immediately initiate corrective action to return the required reactor coolant loop to operation.” ITS 3.4.8 ACTION B.2 states “Initiate action to restore one RCS loop to OPERABLE status and operation.” This changes the CTS by requiring the loop to be OPERABLE as well as be in operation. This change is designated as administrative as it results in no technical change to the CTS.	3.4.8 Required Action B.2	3.4.1.4.2 Action b
3.4.8 A04	CTS 3.4.1.4.2 Action b, in part, requires immediately initiating corrective action to return “the required” loop to operation. ITS 3.4.8 Action B requires essentially the same Action but requires restoration of “one” loop to operation. This changes the CTS by changing “the required” to “one” when referring to returning the loop to operation. This change is designated as administrative as it results in no technical change to the CTS.	3.4.8 ACTION B	3.4.1.4.2 Action b
3.4.9 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.4.9	3.4.3

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.4.9 A02 3.4.9 A02 (continued)	CTS 3.4.3 requires the pressurizer water volume to be less than or equal to 92% of indicated level and CTS 4.4.3.1 requires a verification of the pressurizer water volume. ITS Limiting Condition for Operation (LCO) 3.4.9 requires the pressurizer water level to be ≤ 92% and ITS Surveillance Requirement (SR) 3.4.9.1 requires verification of the pressurizer water level. This changes the CTS by changing “pressurizer water volume” to “pressurizer water level.” This change is designated as administrative as it results in no technical change to the CTS.	3.4.9 SR 3.4.9.1	3.4.3
3.4.9 A03	CTS 3.4.3 ACTION b applies when the pressurizer is otherwise inoperable (i.e., for reasons other than an inoperable group of pressurizer heaters as described in ACTION a). ITS 3.4.9 ACTION A applies when the pressurizer water level is not within limit. This changes the CTS to specifically state the reason the pressurizer is inoperable. This change is designated as administrative as it results in no technical change to the CTS.	3.4.9 ACTION A	3.4.3 Action b
3.4.10 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.4.10	3.4.2.1 3.4.2.2
3.4.10 A02	CTS 3.4.2.1 and CTS 3.4.2.2 require all pressurizer code safety valves to be OPERABLE with a lift setting of 2465 psig + 2%, - 3%. ITS LCO 3.4.10 requires three pressurizer safety valves to be OPERABLE with lift settings ≥ 2391 psig and ≤ 2514 psig. This changes the CTS by including the actual lift settings, in lieu of a plus and minus tolerance band.	LCO 3.4.10	3.4.2.1 3.4.2.2

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	This change is designated as administrative as it results in no technical change to the CTS.		
3.4.10 A03 3.4.10 A03 (continued)	CTS 3.4.2.2 ACTION requires the unit, when the required actions and associated completion times cannot be met, to be in MODE 3 within 6 hours and MODE 4 within 12 hours. ITS 3.4.10 requires the unit to be in MODE 3 in 6 hours and MODE 4 with any RCS cold leg temperature ≤ 275ºF within 24 hours. This changes the CTS by requiring the RCS cold leg temperature to be ≤ 275ºF in MODE 4. This change is designated as administrative because the TS is only applicable when the unit is within the Applicability unless per LCO 3.0.1.	3.4.10	3.4.2.2 Action
3.4.11 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.4.11	3.4.4
3.4.11 A02	CTS 3.4.4 ACTIONS a, b, c, and d describe the compensatory actions to take when Power Operated Relief Valve (PORV)(s) and/or block valve(s) are inoperable. ITS 3.4.11 ACTIONS A, B, C, D, E, F, and G also state the appropriate compensatory actions under the same conditions, however, an ITS 3.4.11 ACTIONS Note has been added. The ITS 3.4.11 ACTION Note allows separate Condition entry for each Pressurizer PORV and PORV block valve. This changes the CTS by providing a specific allowance to enter the Action for each inoperable Pressurizer PORV and PORV block valve. This change is designated as administrative as it results in no technical change to the CTS.	3.4.11 ACTION A ACTION B ACTION C ACTION D ACTION E ACTION F ACTION G	3.4.4 Action a Action b Action c Action d
3.4.11 A03	CTS 3.4.4 Action a applies to one or more PORVs inoperable because of excessive leakage. CTS 3.4.4 Actions b and c apply to one or both PORVs inoperable, respectively, due to causes other than excessive leakage. ITS 3.4.11 ACTIONS specify	3.4.11 ACTION A ACTION B	3.4.4 Action a Action b

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.4.11 A03 (continued)	the conditions of PORV inoperability in terms of PORVs capable of being manually cycled and PORVs not capable of being manually cycled. ITS 3.4.11 ACTION A applies to one or more PORVs inoperable and capable of being manually cycled. ITS 3.4.11 ACTIONS B and E applies to one or two PORVs inoperable, respectively, and not capable of being manually cycled. This changes the CTS Action condition associated with excessive leakage into conditions in which the inoperable PORV can or cannot be manually cycled. This change is designated as administrative as it results in no technical change to the CTS.	ACTION E	Action c
3.4.11 A04	CTS 3.4.4 ACTIONS a, b, c, and d provide compensatory measures for inoperable PORV(s) and provide an alternative option to restore inoperable PORV(s) to OPERABLE status. ITS 3.4.11 ACTIONS A, B, and E provide similar compensatory measures, but do not include the explicit option to restore the valves to OPERABLE status. This changes the CTS by deleting the alternative Action to restore the valves to OPERABLE status. This change is designated as administrative as it results in no technical change to the CTS.	3.4.11 ACTION A ACTION B ACTION E	3.4.4 Action a Action b Action c Action d
3.4.11 A05	CTS 3.4.4 Action c, when both PORVs are inoperable due to causes other than excessive leakage, requires in part; within 1 hour, to close and remove power from each PORV's associated block valve, and within 30 days restore at least one PORV to OPERABLE status. CTS 3.4.4 ACTION d requires similar Actions when one or both block valves are inoperable with an additional requirement to place the associated PORV in manual control within the next hour and shutdown the unit if the inoperable block valve(s) cannot be closed and deactivated within 1 hour. Also, CTS 3.4.4 Action d requires at least one block valve to be restored to OPERABLE status within 30 days. ITS 3.4.11 ACTION E, when two PORVs are inoperable and not capable of being manually cycled, requires one PORV to be restored to OPERABLE status within 30 days. In addition, ITS 3.4.11 ACTION B requires the associated block valve to be closed and power removed within 1 hour. ITS 3.4.11 ACTION F, when two	3.4.11 ACTION C ACTION D ACTION E	CTS 3.4.4 Action c Action d

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.4.11 A05 (continued)	block valves are inoperable, requires one block valve to be restored to OPERABLE status within 30 days. In addition, ITS 3.4.11 ACTION C requires the affected block valve to be closed and power removed within 1 hour. If the Required Actions associated with the inoperable block valve cannot be performed within the associated Completion Time, ITS 3.4.11 ACTION D requires the associated PORV to be placed in manual control within 1 hour (i.e., next 1 hour), be in MODE 3 (i.e., Hot Standby) in 6 hours, and be in MODE 4 in 12 hours (i.e., Hot Shutdown in the following 6 hours). This change is designated as administrative as it results in no technical change to the CTS.		
3.4.11 A06	CTS 3.4.4 Action c, when two PORVs are inoperable, requires one PORV to be restored to OPERABLE status within 30 days and power to the associated block valve to be restored. ITS ACTION E requires one PORV to be restored to OPERABLE status within 30 days but does not require power to the associated block valve to be restored. This changes the CTS by not specifically requiring the power to the associated block valve to be restored following restoration of one PORV with two inoperable. This change is designated as administrative as it results in no technical change to the CTS.	3.4.11 ACTION E	3.4.4 Action c
3.4.12 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.4.12	3.4.9.3
3.4.12 A02	CTS 3.4.9.3 ACTION b states in part, “one PORV inoperable in MODES 4 (when the temperature of any RCS cold leg is less than or equal to 275°F)...” CTS 3.4.9.3 ACTION c states, in part, “one PORV inoperable in MODES 5 or 6 with the reactor vessel head on...” ITS ACTIONS A, B, C, or D do not contain the same clarifying statements for MODE 4 or MODE 6. This changes the CTS by deleting the clarifying statements from the Actions.	3.4.12 ACTION A ACTION B ACTION C ACTION D	3.4.9.3 Action b Action c

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	This change is designated as administrative as it results in no technical change to the CTS.		
3.4.12 A03	CTS Surveillance Requirement (SR) 4.4.9.3.3 states, in part, “is isolated by closed valves with power removed or by locked closed manual valves.” ITS 3.4.12 does not contain this statement but contains the statement “is not capable of injecting into the RCS.” This change is designated as administrative as it results in no technical change to the CTS.	SR 3.4.12.1	4.4.9.3.3
3.4.12 A04	CTS 4.4.9.3.2 requires that the 2.20 square inch vent shall be verified to be open in accordance with the Surveillance Frequency Control Program** when the vent(s) is being used for overpressure protection. CTS 4.4.9.3.2 footnote ** provides an exception to the surveillance frequency stating, “Except when the vent pathway is provided with a valve which is locked, sealed, or otherwise secured in the open position, then verify these valves open in accordance with the Surveillance Frequency Control Program.” Thus, the surveillance frequency for CTS 4.4.9.3.2 is “In accordance with the Surveillance Frequency Control Program,” with an exception to this frequency of “In accordance with the Surveillance Frequency Control Program.” ITS SR 3.4.12.2 requires verifying required RCS vent ≥ 2.20 square inches open at a Frequency of “In accordance with the Surveillance Frequency Control Program.” This changes the CTS by only stating once that the surveillance is performed at a Frequency “In accordance with the Surveillance Frequency Control Program.” This change is designated as administrative as it results in no technical change to the CTS.	SR 3.4.12.2	4.4.9.3.2
3.4.12 A05	CTS 4.4.9.3.1.a states, in part, that each PORV shall be demonstrated OPERABLE by performance of an ANALOG CHANNEL OPERATIONAL TEST on the PORV actuation channel but excluding valve operation, “within 31 days prior to entering a condition in which the PORV is required OPERABLE” and in accordance with the Surveillance Frequency Control Program thereafter when the PORV is required OPERABLE. The statement “within 31 days prior to entering a condition in which the PORV is required	SR 3.4.12.4	4.4.9.3.1.a

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.4.12 A05 (continued)	OPERABLE," is not included in ITS SR 3.4.12.4. This changes the CTS by removing a Frequency which is duplicative of CTS 4.0.4 (ITS SR 3.0.4). ITS SR 3.0.4 states, in part, that entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency. The Frequency specified in the Surveillance Frequency Control Program for CTS 4.4.9.3.1.a (ITS SR 3.4.12.4) is 31 days. Therefore, ITS SR 3.0.4 will continue to require the Surveillance to be performed within the specified frequency (i.e., 31 days) prior to entering a condition in which the PORV is required OPERABLE. This change is designated as administrative as it results in no technical change to the CTS.		
3.4.13 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.4.13	3.4.6.2
3.4.13 A02	Required Action C.2 is modified by a Note that states that LCO 3.0.4.a is not applicable when entering MODE 4. This Note prohibits the use of LCO 3.0.4.a to enter MODE 4 during startup with the LCO not met. If appropriate, LCO 3.0.4 is not applicable to, and the Note does not preclude, changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit. This change is designated as administrative as it results in no technical change to the CTS.	3.4.13 Required Action C.2	3.4.6.2 Action a Action b
3.4.14 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.4.14	3.4.6.2

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.4.14 A02	ITS 3.4.14 Action Note 1 states "Separate Condition entry is allowed for each flow path." CTS 3.4.6.2 does not contain this Note. ITS 3.4.14 ACTION Note 1 provides clarification that each flow path allows separate entry into a Condition. This is allowed based upon the functional independence of the flow path. This change is designated as administrative as it results in no technical change to the CTS.	3.4.14 Action Note 1	3.4.6.2 Action a Action b Action c Action d
3.4.14 A03	ITS 3.4.14 Required Action A.1 Note states "Each valve used to satisfy Required Action A.1 must have been verified to meet SR 3.4.14.1 and be in the reactor coolant pressure boundary." CTS 3.4.6.2 does not contain this Note. Required Action A.1 is modified by this Note such that the valves used for isolation must meet the same leakage requirements as the PIVs and must be within the reactor coolant pressure boundary (RCPB). This change is designated as administrative as it results in no technical change to the CTS.	3.4.14 Required Action A.1 Note	3.4.6.2 Action c
3.4.14 A04	ITS 3.4.14 Required Action B.2 states "LCO 3.0.4.a is not applicable when entering MODE 4." CTS 3.4.6.2 does not contain this Note. This Note prohibits the use of LCO 3.0.4.a to enter MODE 4 during startup with the Limiting Condition for Operation (LCO) not met. However, there is no restriction on the use of LCO 3.0.4.b, if applicable, because LCO 3.0.4.b requires performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering MODE 4, and establishment of risk management actions, if appropriate. LCO 3.0.4 is not applicable to, and the Note does not preclude, changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit. This change is designated as administrative as it results in no technical change to the CTS.	3.4.14 Required Action B.2	3.4.6.2 Action c

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.4.14 A05	CTS SR 4.4.6.2.2 requires leak testing of PIVs in accordance with the INSERVICE INSPECTION PROGRAM and prior to entering MODE 2 when the plant has been in COLD SHUTDOWN for 7 days or more. ITS SR 3.4.14.1 in modified by a Note 2 stating the Surveillance is not required to be performed on the Residual Heat Removal (RHR) System PIVs when the RHR System is aligned to the RCS in the shutdown cooling mode of operation. This changes the CTS by exempting RHR System PIVs from leak testing until the shutdown cooling mode of operation is exited during plant heatup. This change is designated as administrative as it results in no technical change to the CTS.	SR 3.4.14.1	4.4.6.2.2
3.4.14 A06	CTS SR 4.5.2.e.1 is associated with testing the Residual Heat Removal (RHR) System autoclosure interlock functions. These functions included in ITS 3.4.14. Because the autoclosure interlock is separate from PIV leakage limits, ITS 3.4.14 is modified to clearly state that the autoclosure feature is required to be OPERABLE. This changes the CTS by relocating the subject functions from CTS 3.5.2, "[Emergency Core Cooling System] ECCS Subsystems – T_{avg} Greater Than or Equal to 350 °F," to ITS 3.4.14 and clarifying that these functions are required to be OPERABLE. This change is designated as administrative as it results in no technical change to the CTS.	3.4.14	4.5.2.e.1
3.4.15 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.4.15	3.4.6.1
3.4.15 A02	ITS 3.4.15 ACTION E requires entry into Limiting Condition for Operation (LCO) 3.0.3 when no RCS leak detection instruments are OPERABLE. The CTS does not contain	3.4.15 ACTION E	3.4.6.1 Actions

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	this Action. This changes the CTS by adding Action requiring entry into LCO 3.0.3 when no RCS leak detection instruments are OPERABLE. This change is designated as administrative as it results in no technical change to the CTS.		
3.4.16 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.4.16	3.4.8
3.4.16 A02	CTS 3.4.8 ACTIONS a through e state "With the specific activity of the reactor coolant greater than (e.g., 0.25) microcuries per gram DOSE EQUIVALENT I – (e.g., 131)." ITS 3.4.16 Conditions A and B states RCS DOSE EQUIVALENT I-131 not within limit and DOSE EQUIVALENT Xenon-133 (XE-133) not within limit, respectively. This changes the CTS by listing the limiting values in the Surveillance Requirements (SRs) versus the Actions. This change is designated as administrative as it results in no technical change to the CTS.	3.4.16 Condition A Condition B	3.4.8 Action a Action b Action c Action d Action e
3.4.17 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.4.17	3.4.5
Refer to DOC section in ML23151A448	Section 3.5, Emergency Core Cooling Systems (ECCS)		

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.5.1 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.5.1	3.5.1
3.5.1 A02 3.5.1 A02 (continued)	CTS 3.5.1 requires "each" cold leg injection accumulator to be OPERABLE. ITS Limiting Condition for Operation (LCO) 3.5.1 requires "three" ECCS accumulators to be OPERABLE. This changes the CTS by specifying the exact number of ECCS accumulators required to be OPERABLE. This change is designated as administrative change because it does not result in technical changes to the CTS.	3.5.1	3.5.1
3.5.1 A03	CTS 3.5.1 does not contain a specific ACTION for two or more accumulators inoperable. With two or more accumulators inoperable, CTS 3.0.3 would be entered. ITS 3.5.1 ACTION D directs entry into LCO 3.0.3 when two or more accumulators are inoperable. This changes the CTS by specifically stating to enter LCO 3.0.3 in this System Specification. This change is designated as administrative change because it does not result in technical changes to the CTS	3.5.1 Condition D	3.5.1
3.5.1 A04	CTS 4.5.1.1.c states, in part, "when the RCS pressure is above 1000 psig, by verifying that the power to the isolation valve operator is disconnected..." ITS Surveillance Requirement (SR) 3.5.1.5 states "Verify power is removed from each accumulator isolation valve operator." This changes the CTS by removing the explicit RCS pressure requirement from the Surveillance requiring power to be removed from each accumulator isolation valve operation.	3.5.1.5	4.5.1.1.c

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	This change is designated as administrative because it does not result in technical changes to CTS.		
3.5.2 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.5.2	3.5.2
3.5.2 A02 3.5.2 A02 (continued)	CTS 3.5.2 Applicability Footnote ** states "the provision of Specification 4.0.4 are not applicable for entry into MODE 3 for the Safety Injection (SI) flow paths isolated pursuant to Specification 3.4.9.3 provided that the SI flow paths are restored to OPERABLE status prior to Tavg exceeding 380 °F. Safety Injection flow paths may be isolated when Tavg ≤ 380 °F. ITS 3.5.2 Limiting Condition for Operation (LCO) Note states in MODE 3, high head safety injection (HHSI) pumps may be made incapable of injecting to support transition into or from the Applicability of LCO, 3.4.12, "Overpressure Mitigation System (OMS)," when Tavg ≤ 380 °F. This changes the CTS by not adopting the Specification 4.0.4 exception and eliminating the requirement the HHSI flow paths are restored to operable status prior to Tavg exceeding 380 °F. This change is designated as administrative because it does not result in a technical change to the CTS.	3.5.2 LCO Note	3.5.2 Applicability
3.5.2 A03	CTS 3.5.2, Action d, includes a statement that the action applies to both units simultaneously. ITS 3.5.2, does not explicitly state that the ACTIONS apply to both units since the statement is redundant to the requirements of CTS 3.0.5.a (ITS LCO 3.0.10.a). This changes the CTS by deleting redundant detail. This change is designated as administrative because it does not result in a technical change to the CTS.	3.5.2 ACTION A	3.5.2 Action d

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.5.2 A04	CTS 3.5.2 LCO and Actions currently refers to Emergency Core Cooling System (ECCS) equipment and flow paths, Residual Heat Removal (RHR) heat exchangers, and RHR pumps with discharge flow paths aligned to the RCS Cold Legs. ITS refers to these HHSI and RHR components, which comprise the ECCS, as HHSI subsystems or RHR subsystems, respectively. This changes the CTS by referring to the components that comprise the ECCS as HHSI subsystems and RHR subsystems, and allowing the Bases to discuss what comprises each of the ECCS subsystems (see DOC LA01). This change is designated as administrative because it does not result in a technical change to the CTS	3.5.2	3.5.2
3.5.2 A05	CTS LCO 3.5.2.a requires each HHSI pump to each be capable of being powered from its associated OPERABLE emergency diesel generator (EDG). The statement is modified by a footnote# that states inoperability of the required EDG does not constitute inoperability of the associated HHSI pumps. ITS LCO 3.5.2 does not contain a similar requirement, nor does it contain a statement similar to the footnote. This changes the CTS by eliminating the statement that the HHSI pumps be capable of being powered from its associated EDG and the footnote that the inoperability of the EDG does not constitute inoperability of the HHSI pumps. This change is designated as administrative because it does not result in a technical change to the CTS	LCO 3.5.2	LCO 3.5.2.a
3.5.2 A06	CTS 4.5.2, ACTION f, states that with a required HHSI pump OPERABLE but not capable of being powered from its associated EDG, restore the capability within 14 days or in accordance with the Risk Informed Completion Time (RICT) Program, or be in a least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours. ITS 3.5.2 does not contain this ACTION. This changes the CTS by eliminating the ACTION when a HHSI pump is not capable of being powered from its associated EDG. This change is considered administrative because the ITS requirements are equivalent to the CTS requirements.	3.5.2	4.5.2 Action f

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.5.2 A07	CTS 3.5.2, ACTION h, requires the unit to be in MODE 3 in 6 hours and MODE 4 in 12 hours if the inoperable suction flow path from the refueling water storage tank (RWST) cannot be restored to OPERABLE status within 1 hour. ITS 3.5.2, ACTION F, requires the unit to enter LCO 3.0.3 when 100% of the flow equivalent of one OPERABLE RHR subsystem or two OPERABLE HHSI subsystems is not available. LCO 3.0.3 requires the unit, within 1 hour, to be in MODE 3 in 6 hours and MODE 4 in 12 hours. This changes the CTS by requiring LCO 3.0.3 to be entered whenever there is a loss of function (see DOC L03 for the broader application of ITS 3.5.2, ACTION F). This change is designated as administrative because it does not result in a technical change to the CTS	3.5.2 ACTION F	3.5.2 Action h
3.5.3 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.5.3	3.5.3
3.5.4 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.5.4	3.5.4
3.5.4 A02	CTS SR 4.5.2.b.1 requires, in part, that refueling water storage tank (RWST) temperature be verified within the required range of 39 °F and 100 °F, "within one hour upon the outside temperature exceeding its limit for consecutive 23 hours." The Note to ITS SR 3.5.4.1 allows the RWST temperature verification to not be performed until 24 hours after ambient air temperature is < 39 °F or > 100 °F. This change is designated as an administrative change and is acceptable because it does not result in a technical change to the CTS.	SR 3.5.4.1 Note	4.5.2.b.1

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.5.4 A03	CTS 3.5.4 requires one RWST to be OPERABLE for single unit operation or two RWSTs to be OPERABLE for two-unit operation. ITS LCO 3.5.4 requires the RWST to be OPERABLE. This changes the CTS from explicitly requiring both unit RWSTs to be OPERABLE during two-unit operation to requiring the RWST to be OPERABLE when the respective unit is in MODES 1, 2, 3, and 4. This change is designated as an administrative change and is acceptable because it does not result in a technical change to the CTS.	3.5.4	3.5.4
Refer to DOC section in ML23151A449	Section 3.6, Containment Systems		
3.6.1 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.6.1	3.6.1.1 3.6.1.2 3.6.1.6 3.6.1.7
3.6.1 A02	CTS 3/4.6.1 requires CONTAINMENT INTEGRITY. CTS 3.6.1.1 states “Primary CONTAINMENT INTEGRITY shall be maintained.” CTS 3.6.1.1 ACTION requires, in part, without primary CONTAINMENT INTEGRITY to restore CONTAINMENT INTEGRITY within one hour. CTS 3.6.1.2 requires that Containment leakage rates be limited in accordance with the Containment Leakage Rate Testing Program. CTS 3.6.1.2 ACTION requires, in part, that with the measured overall integrated containment leakage rate exceeding 1.0 La, within one hour initiate action to shut the plant down. CTS 3.6.1.6	3.6.1 ACTION A	3.6.1.1 Action 3.6.1.2 Action 3.6.1.6 Actions a, b, c

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	requires the structural integrity of the containment to be maintained within specified parameters. ITS 3.6.1 is the containment specification. ITS LCO 3.6.1 requires the containment to be OPERABLE. ITS 3.6.1 ACTION A requires when containment is inoperable to restore the containment to OPERABLE status within 1 hour. This changes the CTS by replacing the specific CONTAINMENT INTEGRITY definition and all references to it with the requirement for Containment OPERABILITY. Additionally, it changes the CTS by combining CTS 3.6.1.1, CTS 3.6.1.2, and CTS 3.6.1.6 into one specification while retaining the requirement to initiate action within one hour. This change is designated as administrative because it does not result in technical changes to the CTS.		
3.6.1 A03	CTS 3.6.1.1, Containment Integrity, CTS 3.6.1.2, Containment Leakage, and CTS 3.6.1.6, Containment Structural Integrity, are being combined into ITS 3.6.1. The SRs in CTS 4.6.1.1 are being moved to ITS 3.6.2, Containment Air Locks, and SR 3.6.3, Containment Isolation valves. The added SRs to CTS 3.6.1.1 are reworded from CTS 3.6.1.2 and CTS 3.6.1.6 as discussed in DOCs A04 and A05. This change is designated as administrative because it does not result in technical changes to the CTS.	3.6.1 SR 3.6.2.1 SR 3.6.3.2	3.6.1.1 3.6.1.2 3.6.1.6 4.6.1.1.b
3.6.1 A04	CTS 4.6.1.2 requires performance of leakage rate testing in accordance with the Containment Leakage Rate Testing Program. ITS SR 3.6.1.1 requires this same test but adds an exception for containment air lock testing. This changes the CTS by excluding the containment air lock testing in the required CTS surveillance. This change is designated as administrative because it does not result in technical changes to the CTS.	SR 3.6.1.1	4.6.1.2
3.6.1 A05	CTS 4.6.1.6.1 states, in part, that the containment tendons and the containment exterior surfaces shall be examined. CTS 4.6.1.6.2 states, in part, that the structural integrity of the end anchorages of all tendons inspected pursuant to Specification 4.6.1.6.1 and the containment concrete surfaces shall be demonstrated. CTS 4.6.1.6.3 states, in part, that	SR 3.6.1.1 SR 3.6.1.2	4.6.1.6.1 4.6.1.6.2 4.6.1.6.3

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.6.1 A05 (continued)	in accordance with the Containment Leakage Rate Testing Program, a visual inspection of the accessible interior and exterior surfaces of the containment, including the liner plate, shall be performed. ITS SR 3.6.1.1 states to perform required visual examinations and leakage rate testing except for containment air lock testing, in accordance with the Containment Leakage Rate Testing Program. ITS SR 3.6.1.2 states to verify containment structural integrity in accordance with the Pre-Stressed Concrete Containment Tendon Surveillance Program. This changes the CTS by separating the containment visual examinations and leakage testing requirements from the containment tendon surveillances. This change is designated as administrative because it does not result in technical changes to the CTS.		
3.6.2 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.6.2	3.6.1.1 3.6.1.3
3.6.2 A02	CTS 3.6.1.3 states, in part, "Each containment air lock shall be OPERABLE. ITS Limiting Condition for Operation (LCO) 3.6.2 states, "Two containment air locks shall be OPERABLE." This changes the CTS by identifying the total number of airlocks that are required to be OPERABLE. This change is designated as administrative because it does not result in technical changes to the CTS.	3.6.2	3.6.1.3
3.6.2 A03	CTS 3.6.1.3 states, in part, "Each containment air lock shall be OPERABLE." CTS 3.6.1.3 ACTION a states, in part, "With one containment air lock door inoperable" and specifies ACTIONS to be taken. CTS 3.6.1.3 ACTION b states, in part, "With the containment air lock inoperable, except as the result of an inoperable air lock door" and specifies ACTIONS to be taken. ITS 3.6.2 ACTIONS Note 2 states "Separate Condition	3.6.2 ACTIONS Note 2	3.6.1.3 Actions Note

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	entry is allowed for each airlock." ITS 3.6.2 ACTION A states "One or more containment air locks with one containment air lock door inoperable." ITS 3.6.2 ACTION C states "One or more containment air locks inoperable for reasons other than Condition A or B." This changes the CTS by clarifying the current intent of applying the CTS Actions to each air lock separately. This change is designated as administrative because it does not result in technical changes to the CTS.		
3.6.2 A04	CTS 3.6.1.3 ACTION a.1 states in part, to either restore the inoperable air lock door to OPERABLE status within 24 hours or lock the OPERABLE air lock door closed. ITS 3.6.2 ACTION A does not contain the statement to restore the inoperable air lock door to OPERABLE status. This changes CTS by not including the statement to restore the inoperable air lock door to OPERABLE status. This change is designated as administrative because it does not result in technical changes to the CTS.	3.6.2	3.6.1.3 Action a
3.6.2 A05	CTS 4.6.1.3.a and CTS 4.6.1.3.b require air lock leakage rate testing in accordance with the Containment Leakage Rate Testing Program. ITS Surveillance Requirement (SR) 3.6.2.1 requires similar testing, but is modified by Note 1, which states "An inoperable air lock door does not invalidate the previous successful performance of the overall air lock leakage test." This changes the CTS by adding a Note stating that either air lock door is capable of providing a fission product barrier in the event of a Design Basis Accident (DBA). This change is designated as administrative because it does not result in technical changes to the CTS.	SR 3.6.2.1 Note 1	4.6.1.3.a 4.6.1.3.b
3.6.2 A06	CTS 4.6.1.3.b requires demonstrating each containment air lock is OPERABLE by verifying leakage rates are in accordance with the Containment Leakage Rate Testing Program. ITS 3.6.2.1 requires the same test but adds a Note (SR 3.6.2.1 Note 2) requiring that the results be evaluated against acceptance criteria of ITS SR	3.6.2.1 Note 2	4.6.1.3.b

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	3.6.1.1. This changes the CTS by specifically requiring verification of the air lock leakage rates against the Containment leakage rates. This change is designated as administrative because it does not result in technical changes to the CTS.		
3.6.2 A07	CTS 4.6. 1.3.a states in part, that each containment air lock shall be demonstrated OPERABLE following each closing, at the frequency specified in the Containment Leakage Rate Testing Program. ITS SR 3.6.2.1 states to perform required air lock leakage rate testing in accordance with the Containment Leakage Rate Testing Program. This changes the CTS by deleting the statement associated with testing following each closing of the air lock doors. This change is designated as administrative because it does not result in technical changes to the CTS.	SR 3.6.2.1	4.6.1.3.a
3.6.3 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.6.3	3.6.4 3.6.1.1 3.6.1.7
3.6.3 A02	CTS 3.6.4 ACTIONS provide requirements to be taken for each inoperable containment isolation valve (CIV). ITS 3.6.3 includes an explicit Note (ACTION Note 2) that states, “Separate Condition entry is allowed for each penetration flow path.” This Note provides instructions for the proper application of the ACTIONS for ITS compliance. This changes the CTS by providing explicit direction for using the ACTIONS when a CIV is inoperable. This change is designated as administrative because it does not result in technical changes to the CTS.	3.6.3 ACTIONS Note 2	3.6.4

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.6.3 A03	CTS 3.6.4 Action requires, in part, to maintain at least one isolation valve OPERABLE in each affected penetration that is open. CTS ACTION b and c allow 4 hours to isolate the affected penetration when one or more CIVs are inoperable. With two CIVs inoperable in an affected penetration that is open there is not an associated Completion Time; therefore, CTS 3.0.3 is entered immediately. ITS 3.6.3 Required Action B.1 allows 1 hour to isolate the affected penetration flow path when both valves in the same penetration flow path are inoperable. This changes the CTS by prescribing the time allowed to isolate the affected penetration when both CIVs in the same penetration are inoperable. This change is designated as administrative because it does not result in technical changes to the CTS.	3.6.3 Required Action B.1	3.6.4
3.6.3 A04	CTS 3.6.4 ACTION a requires that when one or more of the CIVs are inoperable to restore the inoperable valve(s) to OPERABLE status within 4 hours or take one of the other specified compensatory actions. ITS 3.6.3 does not state the requirement to restore an inoperable isolation valve to OPERABLE status but includes other compensatory Required Actions to take within 4 hours or 72 hours, as applicable. This changes the CTS by not explicitly stating the requirement to restore an inoperable valve to OPERABLE status. This change is designated as administrative because it does not result in technical changes to the CTS.	3.6.3	3.6.4 Action a

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.6.3 A05 3.6.3 A05 (continued)	CTS 4.6.4.1 describes tests that must be performed prior to returning a valve to service after maintenance, repair, or replacement work is performed on the valve or its associated actuator, control, or power circuit. ITS does not include a Surveillance Requirement (SR) that specifies the testing requirements; however, SR 3.0.1 requires that SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. In addition, the definition of OPERABLE – OPERABILITY states that system, subsystem, train, component, or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified safety function(s) and when all necessary attendant instrumentation, controls, normal or emergency electrical power, cooling and seal water, lubrication, and other auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its specified safety function(s) are also capable of performing their related support function(s). This changes the CTS by deleting this post-maintenance Surveillance. This change is designated as administrative because it does not result in technical changes to the CTS.	SR 3.0.1	4.6.4.1
3.6.3 A06	CTS 4.6.1.7.2 requires performance of a leakage rate test for each containment purge supply and exhaust isolation valve in accordance with the Surveillance Frequency Control Program (SFCP). ITS SR 3.6.3.5 requires performance of a leakage rate test for containment purge valves with resilient seals at a Frequency of “In accordance with the Surveillance Frequency Control Program.” This changes the CTS by specifying that the leakage rate test is only required to be performed on containment purge valves with resilient seals. This change is designated as administrative because it does not result in technical changes to the CTS.	SR 3.6.3.5	4.6.1.7.2

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ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.6.3 A07	CTS 4.6.1.7.2 requires the containment purge and exhaust valve measured leakage rate to be within limit when pressurized to P_a. CTS 6.8.4.h provides the requirements for the Containment Leakage Rate Testing Program, and states that the peak calculated containment internal pressure for the design basis loss of coolant accident, P_a, is defined here as the containment design pressure of 55 psig. ITS SR 3.6.3.5 requires performance of the containment purge and exhaust valve leakage test but does not include requirement for testing when pressurized to P_a. This changes the CTS by removing duplicate information associated with the containment purge and exhaust leakage rate testing. This change is designated as administrative because it does not result in technical changes to the CTS.	SR 3.6.3.5 5.5.13	4.6.1.7.2 6.8.4.h
3.6.4 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.6.4	3.6.1.4
3.6.4 A02	CTS 3.6.1.4 states, in part, “Primary containment internal pressure shall be maintained between -2 and +1 psig…” ITS 3.6.4 states “Containment pressure shall be ≥ -2 and ≤ +1 psig.” Additionally, the title for CTS 3.6.1.4 is “Internal Pressure.” The title for ITS 3.6.4 is “Containment Pressure.” This changes the CTS by changing the title and changing the Limiting Condition for Operation (LCO) statement.	3.6.4	3.6.1.4

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ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.6.5 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.6.5	3.6.1.5
3.6.5 A02	CTS 3.6.1.5 states, in part, "Primary containment average air temperature …" ITS 3.6.5 states "containment average air temperature." This changes the CTS by eliminating the word "primary". This change is designated as administrative because it does not result in technical changes to the CTS.	3.6.5	3.6.1.5
3.6.6 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.6.6	3.6.2.1 3.6.2.2
3.6.6 A02	CTS 3.6.2.1 Action a, states, in part, that with one Containment Spray system inoperable restore the inoperable Spray System to OPERABLE status within 72 hours. Similar to CTS 3.6.2.1.a, CTS 3.6.2.1.b also states to restore both Spray Systems to OPERABLE status within 72 hours of initial loss. ITS 3.6.6 Action E, two inoperable containment spray trains, requires entry into Limiting Condition for Operation (LCO) 3.0.3 (Action shall be initiated within 1 hour to place the unit, as applicable, in MODE 3 within 7 hours, MODE 4 within 13 hours, and MODE 5 within 37 hours). This changes the CTS by eliminating the CTS 3.6.2.1 ACTION b, requirement to restore both containment spray systems within 72 hours. This change is designated as administrative because it does not result in technical changes to the CTS.	3.6.6 ACTION E	3.6.2.1.b

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.6.6 A03	CTS 3.6.2.2 Action a, states, in part, that with one of the above required emergency containment cooling units inoperable restore the inoperable cooling unit to OPERABLE status within 72 hours. Similar to CTS 3.6.2.2.a, CTS 3.6.2.2.b also states to restore all of the above required cooling units to OPERABLE status within 72 hours of initial loss. ITS 3.6.6, Action E, states that with two or more emergency containment cooling units inoperable, entry into LCO 3.0.3 (Action shall be initiated within 1 hour to place the unit, as applicable, in MODE 3 within 7 hours, MODE 4 within 13 hours, and MODE 5 within 37 hours) is required. This changes the CTS by eliminating the CTS 3.6.2.2 Action b, requirement to restore all the above required cooling units to OPERABLE status within 72 hours of initial loss. This change is designated as administrative because it does not result in technical changes to the CTS.	3.6.6 ACTION E	3.6.2.2.b
3.6.6 A04	CTS 3.6.2.1 Action b, states, in part, with two Containment Spray Systems inoperable restore at least one Spray System to OPERABLE status within 1 hour or be in HOT STANDBY in 6 hours and COLD SHUTDOWN within the following 30 hours. CTS 3.6.2.2, Action b, states, in part, with two or more of the above required emergency containment cooling units inoperable, restore at least two cooling units to OPERABLE status within 1 hour or be in HOT STANDBY in 6 hours and COLD SHUTDOWN within the following 30 hours. ITS 3.6.6, ACTION E, requires immediate entry into LCO 3.0.3 when both containment spray trains are inoperable or if two or more emergency containment cooling units are inoperable. This changes the CTS by adopting the ITS 3.6.6, ACTION E, in lieu of the aforementioned CTS Actions. This change is designated as administrative because it does not result in technical changes to the CTS.	3.6.6 ACTION E	3.6.2.1 Action b 3.6.2.2 Action b

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.6.7 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.6.7	3.6.2.3
Refer to DOC section in ML23151A450	Section 3.7, Plant Systems		
3.7.1 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.7.1	3.7.1.1
3.7.1 A02	CTS 3.7.1.1 states that all main steam safety valves (MSSVs) shall be OPERABLE with lift settings as specified in Table 3.72. CTS Table 3.72 lists lift setting pressures for four MSSVs in each of the three loops. ITS Limiting Condition for Operation (LCO) 3.7.1 requires four MSSVs per SG to be OPERABLE. This changes the CTS by combining the current LCO requirement and portions of CTS Table 3.7-2 into a single ITS LCO requirement. This change is designated as an administrative change because it does not result is any technical changes to the CTS.	3.7.1	3.7.1.1
3.7.1 A03 3.7.1	CTS 3.7.1.1, ACTIONS a and b, provide compensatory actions for one or more inoperable MSSVs. CTS 3.7.1.1, ACTION a, requires that within 4 hours the MSSV(s) be restored to OPERABLE status or the Power Range Neutron Flux High Setpoint trip be reduced in accordance with the requirements of CTS Table 3.7-1. CTS 3.7.1.1 ACTION b requires that within 4 hours the MSSV(s) be restored to OPERABLE status or reactor power is reduced to less than or equal to the maximum allowable percent of RATED THERMAL POWER (RTP) listed in Table 3.7-1. ITS 3.7.1 ACTIONS Note states "Separate Condition entry is allowed for each MSSV." This changes the CTS by explicitly specifying separate condition entry for each inoperable MSSV.	3.7.1 ACTIONS Note	3.7.1.1, Actions a and b

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
A03 (continued)	This change is designated as an administrative change because it does not result is any technical changes to the CTS.		
3.7.1 A04	CTS 3.7.1.1, ACTION a, states that the Power Range Neutron Flux – High Setpoint trip must be reduced per CTS Table 3.7-1 when one or more MSSVs are found to be inoperable. CTS Table 3.7-1 provides the maximum allowable Power Range Neutron Flux – High Setpoint corresponding to the maximum number of inoperable MSSVs on any operating SG. ITS 3.7.1, ACTION B, requires a reduction in THERMAL POWER and a reduction in the Power Range Neutron Flux – High reactor trip setpoint consistent with the requirements of ITS Table 3.7.1-1. The Table has been revised slightly to provide the associated maximum allowable power for the number–of OPERABLE MSSVs. This changes the CTS by adding an additional explicit statement to reduce THERMAL POWER consistent with ITS Table 3.7.1-1 and by stating the maximum allowable power as a function of OPERABLE, instead of inoperable, MSSVs. This change is designated as an administrative change because it does not result is any technical changes to the CTS.	3.7.1 Required Action B.1	3.7.1.1, Action a
3.7.1 A05	CTS 3.7.1.1, ACTIONS a and b, state that with one or more MSSVs inoperable, either restore the inoperable valves to OPERABLE status or reduce the Power Range Neutron Flux – High Setpoints. ITS 3.7.1, ACTION A, does not include the restoration requirement, only the alternate compensatory measure. This changes the CTS by eliminating the explicit statement to restore the MSSV(s) to OPERABLE status. This change is designated as an administrative change because it does not result is any technical changes to the CTS.	3.7.1, ACTION A	3.7.1.1, Actions a and b
3.7.1 A06	CTS 4.7.1.1 requires verification of each required MSSV lift setpoint, and states "The provisions of Specification 4.0.4 are not applicable for entry into MODE 3." ITS Surveillance Requirement (SR) 3.7.1.1 does not contain this statement. However, ITS SR 3.7.1.1 does contain a Note that states, "Only required to be performed in MODES 1 and 2." This changes the CTS by revising presentation of the CTS 4.0.4 exception.	SR 3.7.1.1 Note	4.7.1.1

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	This change is designated as an administrative change because it does not result is any technical changes to the CTS.		
3.7.2 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.7.2	3.7.1.5
3.7.2 A02	CTS 3.7.1.5 ACTIONS (MODES 2 and 3) 1 and 2 provide compensatory actions for one or more inoperable Main Steam Isolation Valves (MSIVs). CTS 3.7.1.5 ACTION 1 (MODES 2 and 3) requires that within 8 hours, inoperable MSIV(s) are closed. CTS 3.7.1.5 ACTION 2 (MODES 2 and 3) requires that once per 7 days the inoperable MSIV(s) be verified closed. ITS 3.7.1 ACTION C Note states "Separate Condition entry is allowed for each MSIV." This changes the CTS by explicitly specifying separate condition entry for each inoperable MSIV. This change is designated as an administrative change because it does not result is any technical changes to the CTS.	3.7.2 ACTION C Note	3.7.1.5 Actions (MODES 2 and 3) 1 and 2
3.7.2 A03 3.7.2 A03 (continued)	CTS 4.7.1.5 requires verification of each required MSIV lift setpoint, and states "The provisions of Specification 4.0.4 are not applicable for entry into MODE 3." ITS Surveillance Requirement (SR) 3.7.2.1 does not contain this statement. However, ITS SR 3.7.2.1 does contain a Note that states, "Only required to be performed in MODES 1 and 2." This changes the CTS by not adding the CTS 4.0.4 exception. This change is designated as an administrative change because it does not result is any technical changes to the CTS.	SR 3.7.2.1 Note	4.7.1.5

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.7.3 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.7.3	3.7.1.7
3.7.3 A02	CTS 3.7.1.7 ACTION a states, in part, to either restore OPERABILITY, or close or isolate the inoperable Feedwater Control Valve (FCV) within 72 hours. CTS 3.7.1.7 ACTION b states, in part, to either restore operability, or close or isolate the inoperable Feedwater Isolation Valve (FIV) within 72 hours. CTS 3.7.1.7 ACTION c states, in part, to either restore operability, or close or isolate the inoperable bypass valve(s) within 72 hours. CTS 3.7.1.7 ACTION d states, in part, to either restore operability, or isolate the affected flow path within 8 hours. ITS 3.7.3 ACTIONS A, B, C and D do not contain the statement to restore an inoperable FIV, FCV, bypass valve, or affected flow path to OPERABLE status. This changes the CTS by not including the statement to restore an inoperable FIV, FCV, bypass valve, or affected flow path to OPERABLE status. This change is designated as an administrative change because it does not result is any technical changes to the CTS.	3.7.3 ACTIONS A, B, C and D	3.7.1.7 Actions a, b, c, d
3.7.3 A03 3.7.3 A03 (continued)	CTS 3.7.1.7 Applicability Footnote ** contains the provision that Specification 4.0.4 is not applicable for entry into MODE 3. CTS 4.0.4 states that entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified frequency, except as provided by Specification 4.0.3. A similar Note is added to ITS 3.7.3 that is associated with SR 3.7.3.1 and SR 3.7.3.2 stating these surveillances are only required to be performed in MODES 1 and 2. This changes the CTS by providing similar wording that the surveillances associated with ITS LCO 3.7.3 are not required to be met for entry into MODE 3. This change is designated as an administrative change because it does not result is any technical changes to the CTS.	SR 3.7.3.1 Note SR 3.7.3.2 Note	3.7.1.7 Applicability Footnote

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.7.3 A04	CTS 3.7.1.7 Action c states, in part, "With one or more bypass valves in different steam generator flow paths inoperable…" ITS 3.7.3 Condition C does not contain the phrase "in different steam generator flow paths." This changes the CTS by not including the clarifying statement that the condition applies in different steam generator flow paths. This change is designated as an administrative change because it does not result is any technical changes to the CTS.	3.7.3 Condition C	3.7.1.7 Action c
3.7.4 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.7.4	3.7.1.4
3.7.4 A02	CTS 4.7.1.4 requires the specific activity of the secondary coolant system to be verified within limit in accordance with Table 4.7-1. CTS Table 4.7-1 provides the secondary coolant system sample analysis measurement and frequency requirements. ITS Surveillance Requirement (SR) 3.7.4.1 requires verification that the secondary coolant specific activity is less than or equal to 0.10 microcuries per gram DOSE EQUIVALENT I-131 at a Frequency that is in accordance with the Surveillance Frequency Control Program. This changes the CTS by moving the secondary coolant system sample analysis measurement and frequency requirements from a table and placing the information within the Surveillance Requirement. This change is designated as an administrative change because it does not result is any technical changes to the CTS.	SR 3.7.4.1	4.7.1.4
3.7.5 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.7.5	3.7.1.2

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.7.5 A02	CTS 3.7.1.2 Actions 2) and 4) provide directions to follow other Actions if specified conditions are not met. Action 2) states, in part, to either restore both trains to OPERABLE status or restore one train to OPERABLE status and follow ACTION statement 1 above for the other train. Action 4) states, in part, to verify OPERABILITY of two independent steam supply flowpaths or follow ACTION statement 1 or 2 above as applicable. ITS 3.7.5 does not contain these directions to follow other ACTION statements if specified conditions are not met. This changes the CTS by not including direction to follow other Actions. This change is designated as an administrative change because it does not result is any technical changes to the CTS.	None	3.7.1.2 Actions Notes 2 and 4
3.7.5 A03	CTS 4.7.1.2.1.a.1 requires verifying each steam turbine-driven pump operates for 15 minutes or greater and develops a flow of greater than or equal to 373 gpm. CTS 4.7.1.2.1.a.2 requires verifying that the auxiliary feedwater (AFW) discharge valves and the steam supply and turbine pressure valves operate as required to deliver the required flow during the pump performance test required by CTS 4.7.1.2.1.a.1. CTS 4.7.1.2.1.a.1 states that the provisions of Specification 4.0.4 are not applicable for entry Into MODES 2 and 3. ITS SR 3.7.5.2 (CTS 4.7.1.2.1.a.1) and SR 3.7.5.6 (CTS 4.7.1.2.1.a.2) require pump flow testing and valve operational testing, respectively, and contain a similar Note that states, "Only required to be performed in MODE 1." This changes the CTS by revising the presentation of the CTS 4.0.4 exception. This change is designated as an administrative change because it does not result is any technical changes to the CTS.	SR 3.7.5.2	4.7.1.2.1.a.1
3.7.5 A04	CTS 4.7.1.2.1.a.2 requires verifying the AFW System discharge valves and the steam supply and turbine pressure valves operate as required to deliver the required flow during the pump performance test specified in CTS 4.7.1.2.1.a.1. ITS SR 3.7.5.6 similarly requires verifying the AFW pump discharge valves, steam supply valves, and turbine valves operate as required to deliver the required flow during performance of SR 3.7.5.2. This changes the CTS by replacing "turbine pressure valves" with "turbine valves."	SR 3.7.5.6	4.7.1.2.1.a.2

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ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	This change is designated as an administrative change because it does not result is any technical changes to the CTS.		
3.7.6 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.7.6	3.7.1.3
3.7.6 A02	CTS 3.7.1.3 requires that the condensate storage tanks system be OPERABLE with a minimum indicated water volume of either 210,000 or 420,000 gallons based on the opposite unit's MODE. CTS 4.7.1.3 requires demonstration of the CST System OPERABILITY by verifying the indicated water volume is within limits. ITS 3.7.6 requires that condensate storage tank system be OPERABLE stating the required indicated water volume in surveillance requirements (SR) SR 3.7.6.2 and SR 3.7.6.1 as a level ≥ 210,000 or ≥ 420,000 gallons based on the opposite unit's MODE. This changes the CTS by describing the indicated water volume as a level. This change is designated as an administrative change because it does not result is any technical changes to the CTS.	SR 3.7.6.1 SR 3.7.6.2	3.7.1.3 4.7.1.3
3.7.6 A03	CTS 3.7.1.3 provides OPERABILITY requirements for the CST System. Because the CST System is shared between both Unit 3 and Unit 4, CTS 3.7.1.3 provides different requirements and ACTIONS based on the opposites unit's MODE. If the CST System's condition does not support operation of both units in MODES 1, 2, and 3 both units are required to shut down. CTS 3.7.1.3 ACTION 2), when the opposite unit is in MODE 1, 2, or 3, allows 12 hours to be in at least HOT STANDBY and states, "This ACTION applies to both units simultaneously." The other CTS 3.7.1.3 ACTIONS allow 6 hours to be in at least HOT STANDBY when their stated actions and allowed outage times are not met. ITS 3.7.6 Condition B and Condition C contain a Note that states when the 6 hour or 12 hour Completion Time to shut down to MODE 3 is applicable. This changes the	3.7.6 Condition B Note Condition C Note	3.7.1.3 Action 2

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ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	CTS replacing the statement associated with the ACTION that applies to both units simultaneously with Condition Note stating which Condition applies based on whether a single unit or both units are required to be shut down. This change is designated as an administrative change because it does not result is any technical changes to the CTS.		
3.7.7 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.7.7	3.7.2
3.7.7 A02	CTS 3.7.2 states that the Component Cooling Water System (CCW) shall be OPERABLE with: a. Three CCW pumps, and b. Two CCW Heat Exchangers. ITS LCO 3.7.7 states that two CCW trains shall be OPERABLE. This changes the CTS by placing the CCW system components into separate trains. This change is designated as an administrative change because it does not result is any technical changes to the CTS.	LCO 3.7.7	3.7.2
3.7.7 A03	CTS 3.7.2 requires the Component Cooling Water System to be OPERABLE in MODES 1, 2, 3, and 4 and provide actions for various levels of system inoperability. However, CTS does not explicitly provide actions for all degraded conditions (e.g., three CCW pumps inoperable). ITS 3.7.7 ACTION C provides similar actions for the condition when two CCW trains are inoperable. This changes the CTS by explicitly stating when entry into LCO 3.0.3 is required. This change is designated as an administrative change because it does not result is any technical changes to the CTS.	3.7.7 ACTION C	3.7.2
3.7.7 A04	CTS 4.7.2.b.1) does not contain explicit guidance concerning CCW system OPERABILITY when isolating CCW flow to individual components. ITS Surveillance Requirement (SR) 3.7.7.1 contains a Note, which states, “Isolation of CCW flow to	SR 3.7.7.1 Note	4.7.2.b.1

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ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	individual components does not render the CCW system inoperable." This changes the CTS by adding an allowance that is not explicitly stated in the CTS. This change is designated as an administrative change because it does not result is any technical changes to the CTS.		
3.7.7 A05 3.7.7 A05 (continued)	CTS 4.7.2.b.1) requires verification that each CCW valve (manual, power operated, or automatic) servicing safety related equipment that is not locked, sealed, or otherwise secured in position, is in its correct position. CTS 4.7.2.c.1) requires verification that each CCW automatic valve servicing safety related equipment actuates to its correct position on a Safety Injection test signal. ITS SR 3.7.7.1 requires verification that each CCW manual, power operated, and automatic valve in the flow path servicing safety related equipment that is not locked, sealed, or otherwise secured in position, is in the correct position. ITS SR 3.7.7.2 requires verification that each CCW automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal. This changes the CTS by adding the words "in the flow path" to CTS 4.7.2.b.1) (ITS SR 3.7.7.1) and replacing the words "servicing safety related equipment" with "in the flow path" in CTS 4.7.2.c.1) (ITS SR 3.7.7.2). This change is designated as an administrative change because it does not result is any technical changes to the CTS.	SR 3.7.7.1 SR 3.7.7.2	4.7.2.b.1 4.7.2.c.1
3.7.7 A06	CTS 4.7.2.c.2) requires verification that each CCW System pump starts automatically on a SI test signal. CTS 4.7.2.c.3) requires verification that the interlocks required for CCW OPERABILITY are OPERABLE. ITS SR 3.7.7.3 requires verification that each CCW pump starts automatically on an actual or simulated actuation signal. This changes the CTS by removing the duplicative requirement to verify that the interlocks required for OPERABILITY are OPERABLE, aligning those interlocks to the requirement to verify the CCW pumps start automatically on a SI test signal. This change is designated as an administrative change because it does not result is any technical changes to the CTS.	SR 3.7.7.3	4.7.2.c.3

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ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.7.8 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS. .	3.7.8	3.7.3
3.7.8 A02	CTS 3.7.3 states that the Intake Cooling Water System (ICW) shall be OPERABLE with: a. Three ICW pumps, and b. Two ICW headers. ITS LCO 3.7.8 states that two ICW trains shall be OPERABLE. This changes the CTS by placing the ICW system components into separate trains. This change is designated as an administrative change because it does not result is any technical changes to the CTS.	LCO 3.7.8	3.7.3
3.7.8 A03 3.7.8 A03 (continued)	CTS 4.7.3.a requires verification that each valve (manual, power operated, or automatic) servicing safety related equipment that is not locked, sealed, or otherwise secured in position, is in its correct position. CTS 4.7.3.b.1) requires verification that each automatic valve servicing safety related equipment actuates to its correct position on a Safety Injection test signal. ITS SR 3.7.8.1 requires verification that each ICW manual, power operated, and automatic valve in the flow path servicing safety related equipment that is not locked, sealed, or otherwise secured in position, is in the correct position. ITS SR 3.7.8.2 requires verification that each ICW automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal. This changes the CTS by adding the words "in the flow path" to CTS 4.7.3.a (ITS SR 3.7.8.1) and replacing the words "servicing safety related equipment" with "in the flow path" in CTS 4.7.2.b.1) (ITS SR 3.7.8.2). This change is designated as an administrative change because it does not result is any technical changes to the CTS.	SR 3.7.8.1 SR 3.7.8.2	4.7.3.a 4.7.3.b.1
3.7.8 A04	CTS 4.7.3.a does not contain explicit guidance concerning Intake Cooling Water (ICW) system OPERABILITY when isolating ICW flow to individual components. ITS Surveillance Requirement (SR) 3.7.8.1 contains a Note, which states, "Isolation of ICW flow to individual components does not render the ICW system inoperable." This changes the CTS by adding an allowance that is not explicitly stated in the CTS.	SR 3.7.8.1	4.7.3.a

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ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	This change is designated as an administrative change because it does not result is any technical changes to the CTS.		
3.7.8 A05	CTS 4.7.3.b.2) requires verification that each ICW system pump starts automatically on a SI test signal. CTS 4.7.3.b.3) requires verification that the interlocks required for system OPERABILITY are OPERABLE. ITS SR 3.7.8.3 requires verification that each ICW pump starts automatically on an actual or simulated actuation signal. This changes the CTS by removing the duplicative requirement to verify that the interlocks required for OPERABILITY are OPERABLE, aligning those interlocks to the requirement to verify the ICW pumps start automatically on a SI test signal. This change is designated as an administrative change because it does not result is any technical changes to the CTS.	SR 3.7.8.3	4.7.3.b.3
3.7.9 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.7.9	3.7.4
3.7.9 A02	The CTS Action includes a statement that the action applies to both units simultaneously. ITS 3.7.9 ACTIONS do not explicitly state that the ACTIONS apply to both units. This changes the CTS by deleting redundant detail. This change is designated as an administrative change because it does not result is any technical changes to the CTS.	None	3.7.4 Action
3.7.10 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.7.10	3.7.5

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ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.7.10 A02	CTS 3.7.5 requires the Control Room Emergency Ventilation System (CREVS) to be OPERABLE and explicitly lists the components required to meet the Limiting Condition for Operation (LCO). ITS LCO 3.7.10 requires two CREVS trains and three control room air handling units (AHUs) to be OPERABLE. ITS LCO 3.7.11 requires two Control Room Emergency Air Temperature Control System (CREATCS) trains to be OPERABLE. This changes the CTS by providing separate Specifications for the CREVS and the CREATCS. This change is designated as an administrative change because it does not result is any technical changes to the CTS.	LCO 3.7.10	3.7.5
3.7.10 A03	The CTS 3.7.5, ACTION b, states, in part, that with the above requirements (CREVS Actions) not satisfied to be in at least HOT STANDBY within the next 6 hours for one Unit, or 12 hours for both Units, and in COLD SHUTDOWN within the following 30 hours. In addition, CTS Bases states that that when an ACTION statement requires a dual unit shutdown, the time to be in HOT STANDBY is 12 hours. This is to allow the orderly shutdown of one unit at a time without jeopardizing the stability of the electrical grid by imposing a simultaneous dual unit shutdown. ITS 3.7.10, Condition D (be in MODE 3 in 6 hours), is modified by a Note that states that Condition D is not applicable when a dual unit shutdown is required. Proposed ITS 3.7.10, Condition E (be in MODE 3 in 12 hours), is added and modified by a Note stating that Condition E is only applicable when a dual unit shutdown is required. This modifies the CTS to clarify what Completion Times should be followed when requirements are not met. This change is designated as an administrative change because it does not result is any technical changes to the CTS.	3.7.10, Condition D Note Condition E Note	3.7.5 Action b
3.7.10 A04	CTS 3.7.5, ACTION a.5, contains the remedial actions for all MODES and conditions listed in the Applicability when both recirculation fans or the required CREVS filter is inoperable (MODES 1, 2, 3, 4, 5, 6, and during the movement of irradiated fuel assemblies). The ITS proposes to create separate Conditions, one applicable to operation in MODES 1, 2, 3, and 4 (ACTION H) and one applicable in MODES 5 and 6, and during the movement of irradiated fuel assemblies (ACTION L) consistent with the	3.7.10 ACTION H ACTION L	3.7.5 Action a.5

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ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	ISTS presentation approach. This changes the CTS by creating separate ACTIONS to differentiate between specific MODES of operation. This change is designated as an administrative change because it does not result is any technical changes to the CTS.		
3.7.11 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.7.11	3.7.5
3.7.11 A02	CTS 3.7.5 requires, in part, that the Control Room Emergency Ventilation System shall be OPERABLE* with: a. Three air handling units, and b. Two condensing units. ITS Limiting Condition for Operation (LCO) 3.7.11 states that two Control Room Emergency Air Temperature Control System (CREATCS) trains shall be OPERABLE. This changes the CTS by providing a separate LCO for the CREATCS. This change is designated as an administrative change because it does not result is any technical changes to the CTS.	LCO 3.7.11	3.7.5
3.7.11 A03	CTS 3.7.5 does not provide any actions to take if two CREATCS trains are inoperable. ITS 3.7.11, Condition E and Required Action E.1, provide Action for two inoperable CREATCS trains when in MODES 5 or 6, or during the movement of irradiated fuel assemblies. ITS 3.7.11, Condition F and Required Action F.1, provide Action for two inoperable CREATCS trains when in MODES 1, 2, 3, or 4. This changes the CTS by explicitly providing action to be taken when two CREATCS trains are inoperable. This change is designated as an administrative change because it does not result is any technical changes to the CTS.	3.7.11, Condition E and Required Action E.1	3.7.5
3.7.12 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.7.12	3.9.11

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.7.12 A02	CTS 3.9.11 ACTION states, in part, that with the requirements of the Specification not satisfied, to suspend all movement of fuel assemblies. ITS 3.7.12 Required Action A.1 requires the immediate suspension of movement of irradiated fuel assemblies in the spent fuel pool. This changes the CTS by explicitly specifying that the compensatory action to suspend all movement of fuel assemblies requires an immediate response, not to preclude movement of a fuel assembly to a safe position.	3.7.12 Required Action A.1	3.9.11 Action a
3.7.12 A02 (continued)	This change is designated as an administrative change because it does not result is any technical changes to the CTS.		
3.7.13 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.7.13	3.9.14
3.7.14 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.7.14	3.9.14 5.5.1 5.5.2 5.5.3
3.7.14 A02	CTS 3.9.14 LCO states “The combination of initial enrichment, burnup, and cooling time of each fuel assembly stored in the Spent Fuel Pit shall be in accordance with Specification 5.5.1.” ITS 3.7.14 Limiting Condition for Operation (LCO) states something similar; however, instead of referencing the sections from the Design Features Chapter (ITS Chapter 4.0), the applicable Section is being moved to ITS 3.7.14, including a portion that is added to the LCO, and the associated Tables and Figures. This changes	3.7.14 LCO	3.9.14 LCO

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	the CTS by moving the items referenced in the Design Features Chapter of the CTS to ITS Section 3.7.14. This change is designated as an administrative change because it does not result is any technical changes to the CTS.		
Refer to DOC section in ML23151A451	Section 3.8, Electrical Power Systems		
3.8.1 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS. .	3.8.1	3.8.1.1
3.8.1 A02	CTS Limiting Condition for Operation (LCO) 3.8.1.1.a requires two startup transformers and their associated circuits to be OPERABLE. CTS LCO 3.8.1.1.b requires three separate and independent diesel generators to be OPERABLE. ITS LCO 3.8.1.a requires two qualified circuits between the offsite transmission network and the unit onsite Class 1E AC Electrical Power Distribution System be OPERABLE. ITS LCO 3.8.1 b states "Two unit emergency diesel generators (EDGs) capable of supplying the onsite Class 1E power distribution train(s)," shall be OPERABLE. ITS LCO 3.8.1.c requires one qualified circuit between the offsite transmission network and the opposite unit onsite Class 1E AC Electrical Power Distribution train(s) needed to support equipment required by LCO 3.5.2, "ECCS – Operating," LCO 3.7.10, "Control Room Emergency Ventilation System (CREVS)," and LCO 3.7.11, "Control Room Emergency Air Temperature Control System (CREATCS)," and LCO 3.8.4, "DC Sources – Operating," be OPERABLE. ITS 3.8.1.d requires the opposite unit EDG(s) capable of supplying power to support equipment required by LCO 3.5.2, LCO 3.7.10, LCO 3.7.11, and LCO 3.8.4 shall be OPERABLE. This changes the CTS by clarifying the qualified offsite circuit(s), which	LCO 3.8.1.a LCO 3.8.1.b LCO 3.8.1.c LCO 3.8.1.d	3.8.1.1.a 3.8.1.1.b

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	includes the startup transformers, is the circuit path from the transmission network to the required Class 1E AC Electrical Power Distribution train(s) required to support the unit's operation and that the EDGs are capable of supplying the required electrical power to the distribution trains that they serve. This clarification change is designated as administrative because it does not result in technical changes to the CTS.		
3.8.1 A03	CTS LCO 3.8.1.1 does not contain a requirement for the sequence timers associated with surveillance requirement 4.8.1.1.2.g.12. ITS LCO 3.8.1.e, requires the automatic load sequencers for Train A and Train B to be OPERABLE. This changes the CTS by specifically stating the LCO requirement for the sequence timer(s). This change is designated as administrative because the technical requirements of the specifications have not changed.	LCO 3.8.1.e	3.8.1.1
3.8.1 A04	CTS 3.8.1.1.b.1.c (OPERABILITY of a separate fuel transfer pump) footnote ** states, in part, that a temporary Class III fuel storage system containing a minimum volume of 38,000 gallons of fuel oil may be used for up to 10 days during the performance of Surveillance Requirement (SR) 4.8.1.1.2.i.1 (Note that PTN License Amendments 263 and 258 (ML15166A320) changed CTS 4.8.1.1.2.i.1 to CTS 4.8.1.1.2.i but missed correcting this in the CTS LCO footnote) for the Unit 3 storage tank while Unit 3 is in MODES 5, 6, or defueled. ITS SR 3.8.1.5 (verify the fuel oil transfer system operates to automatically transfer fuel oil from the storage tank to the day tanks) Note states that this SR is not required to be met for Unit 3 EDGs during use of a temporary Class III fuel storage system as allowed by LCO 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air." This changes the CTS by referencing the ITS location that the allowance will be linked to. This change is designated as administrative because the technical requirements of the specifications have not changed.	3.8.1 SR 3.8.1.5 Note	3.8.1.1.b.1.c 4.8.1.1.2.i

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 A05 3.8.1 A05 (continued)	CTS 3.8.1.1, ACTIONS a.5, d.2, e.2, e.3, and CTS 3.8.2.1 ACTION a include a statement that the action applies to both units simultaneously. ITS 3.8.1, does not explicitly state that the ACTIONS apply to both units because the statement is redundant to the requirements of CTS 3.0.5.a (ITS LCO 3.0.10.a). This changes the CTS by deleting redundant detail. This change is solely a presentation preference and is designated as administrative because it does not result in a technical change to the CTS.	3.8.1	3.8.1.1 Action a.5 Action d.2 Action e.2 Action e.3 and 3.8.2.1 Action a
3.8.1 A06	CTS SR 4.8.1.1.2 states that each EDG shall be demonstrated OPERABLE. CTS SR 4.8.1.1.2.g.12 is associated with EDG OPERABILITY and states to verify that the automatic load sequence timer is OPERABLE with the interval between each load block within ± 10% of its design interval. If the requirement of CTS SR 4.8.1.1.2.g.12 cannot be met, the EDG is declared inoperable, and the appropriate Actions are entered. ITS LCO 3.8.1.e requires that the automatic load sequencers for Train A and Train B shall be OPERABLE. ITS 3.8.1 ACTION H requires that with one automatic load sequencer inoperable, to restore the automatic load sequencer to OPERABLE status within 72 hours or in accordance with the RICT Program. This changes the CTS by providing a specific Condition for an inoperable automatic load sequencer with a stated Required Action. This change is designated as administrative because the technical requirements of the specifications have not changed.	3.8.1 ACTION H	4.8.1.1.2 4.8.1.1.1.g.12
3.8.1 A07	CTS 3.8.1.1 does not contain an Action for the combination of one or more required offsite circuits inoperable concurrent with two or more required EDGs inoperable, or one or more required EDGs inoperable concurrent with two or more required offsite circuits inoperable. These combination of inoperabilities would subsequently require entering CTS LCO 3.0.3 since the CTS does not address these configurations. ITS 3.8.1, Condition K, explicitly states the combination of AC source inoperabilities that warrant entry into LCO 3.0.3. ITS 3.8.1, ACTION K, requires entering LCO 3.0.3 immediately if one or more required offsite circuits are inoperable concurrent with two or more required	3.8.1 ACTION K	3.8.1.1

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 A07 (continued)	EDGs inoperable; or one or more required EDGs are inoperable concurrent with two or more required offsite circuits inoperable. This changes the CTS by adding a specific ACTION requiring entry into LCO 3.0.3. This change is designated as administrative because the technical requirements of the specifications have not changed.		
3.8.1 A08	CTS 3.8.1.1 Actions, in part, state, "This ACTION applies to both units simultaneously." In addition, CTS 3.8.1.1 Actions provide different Completion Times to shut down the Unit(s) to at least HOT STANDBY (MODE 3). Generally, two different Completion Times are used in CTS to reach HOT SHUTDOWN, 6 hours and 12 hours based on how many units are being shutdown simultaneously. A variance of these Completion Times is used if a dual unit shutdown is required without offsite power (i.e., natural circulation cooldown required) that provides additional time to bring the units to COLD SHUTDOWN consecutively. ITS provides two different Actions depending on a single unit shut down (ACTION I) or dual unit shut down (ACTION J). This changes the CTS by providing distinct separate Actions in each of the two different conditions. This change is designated as administrative because the technical requirements of the specifications have not changed.	3.8.1 ACTION I ACTION J	3.8.1.1 Actions Action e.2
3.8.1 A09	CTS 4.8.1.1.2.g.2 and CTS 4.8.1.1.2.g.3 are provided with footnote * that states, "For the purpose of this test, warmup procedures, such as idling, gradual acceleration, and gradual loading as recommended by the manufacturer may be used." Corresponding ITS SR 3.8.1.8 and SR 3.8.1.9 do not include this footnote. This changes the CTS by removing a footnote allowing use of warmup procedures as recommended by the manufacturer. This change is designated as administrative because the technical requirements of the specifications have not changed.	3.8.1	4.8.1.1.2.g.2 4.8.1.1.2.g.3

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 A10	CTS 3.8.1.1 Action a provides requirements for the condition with one of two startup transformers or an associated circuit inoperable and requires the startup transformer and associated circuits to be restored to OPERABLE status within 72 hours or in accordance with the RICT Program. CTS 3.8.1.1 Action a.4, in part, allows the time to restore the startup transformer and associated circuits to be restored to OPERABLE status within 30 days if the startup transformer is associated with the opposite unit. CTS 3.8.1.1 Action e provides requirements for the condition with two of the required startup transformers or their associated circuits inoperable. ITS LCO 3.8.1 more precisely defines the offsite circuits as two-unit offsite circuits and one opposite unit offsite circuit effectively requiring three offsite circuits (two-unit circuits and one opposite unit circuit). ITS 3.8.1 ACTION A provides requirements for the condition with one-unit offsite circuit inoperable and requires the circuit to be restored to OPERABLE status within 72 hours or in accordance with the RICT Time Program. ITS 3.8.1 ACTION B provides requirements for the condition with one opposite unit offsite circuit inoperable and requires the circuit to be restored to OPERABLE status within 30 days. ITS 3.8.1, ACTION D, provides requirements for the condition with unit offsite circuits inoperable or three offsite circuits inoperable. This change is a presentation change and does not represent a technical change since the condition of three offsite circuits inoperable in ITS is equivalent to the CTS condition of two startup transformers or associated circuits inoperable. This change is designated as administrative because the technical requirements of the specifications have not changed.	3.8.1 ACTION A ACTION B	3.8.1.1 Action a Action e
3.8.1 A11	CTS 4.8.1.1.2.a.6 requires the verification that each EDG is aligned to provide standby power to the associated emergency buses. ITS 3.8.1 does not contain this surveillance requirement. This changes the CTS by deleting the surveillance requirement as the detail that each EDG is aligned to provide standby power to the associated emergency buses is included in the ITS LCO. This change is designated as administrative because the technical requirements of the specifications have not changed.	3.8.1	4.8.1.1.2.a.6

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 A12	CTS 3.8.1.1 ACTION 3 provides actions if the inoperable startup transformer is the associated startup transformer and became inoperable. CTS 3.8.1.1 ACTION 3.a) provides an action to take within 24 hours. If CTS 3.8.1.1 ACTION 3.a) is not completed within 24 hours CTS ACTION 3.b) provides an action to restore the inoperable associated startup transformer within the next 48 hours, for a total of 72 hours inoperable, or in accordance with the RICT Program or commence a shutdown. ITS 3.8.1 Required Action A.3 requires that with one Unit (associated) offsite circuit inoperable to restore the offsite circuit to OPERABLE status within 72 hours or in accordance with the RICT Program or commence a shutdown. This changes the CTS by combining the Completion Times of CTS 3.8.1.1 ACTION 3.a) and ACTION 3.b) (24+48 = 72) into the ITS 3.8.1 Required Action A.3 of 72 hours. This change is designated as administrative because the technical requirements of the specifications have not changed.	3.8.1 Required Action A.3	3.8.1.1 Action 3
3.8.1 A13 3.8.1	CTS 3.8.1.1 Action c provides requirements for the condition with one startup transformer and one of the required diesel generators inoperable requiring restoration of one of the inoperable sources to OPERABLE status in accordance with ACTIONS a and b, as appropriate. CTS 3.8.1.1.a states, in part, that as a minimum, the following A.C. electrical power sources shall be OPERABLE and includes two startup transformers and their associated circuits. ITS LCO 3.8.1 more precisely defines the offsite circuits required for each unit effectively requiring up to three offsite circuits (two-unit circuits and one opposite unit circuit, if required). ITS 3.8.1 ACTION E provides requirements for the condition with one unit or two required offsite circuits inoperable and one required EDG inoperable requiring either the circuit(s) or the EDG to be restored to OPERABLE status within 72 hours or in accordance with the RICT Program. This changes the CTS presentation by using the more precise definition of the offsite circuits for each unit effectively requiring up to three offsite circuits (two-unit circuits and one opposite unit circuit). This change is designated as administrative because the technical requirements of the specifications have not changed.	3.8.1 ACTION E	3.8.1.1 Action c

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
A13 (continued)			
3.8.1 A14 3.81 A14	CTS 3.8.1.1.b requires three separate and independent diesel generators to be OPERABLE. CTS 3.8.1.1 Action d.2 requires, with one diesel generator inoperable (i.e., one of the three required EDGs inoperable), verifying at least two Safety Injection pumps are OPERABLE and capable of being powered from their associated OPERABLE diesel generators and if the verification is not satisfied in 2 hours to shutdown the units. CTS 3.8.2.1 requires specific DC battery banks to be OPERABLE with one of two associated full capacity chargers OPERABLE and powered by their associated motor control center (MCC), and the associated EDG to be OPERABLE. CTS 3.8.2.1, Action a, requires restoring EDG capability to the required battery chargers within 72 hours or in accordance with the RICT Program when one or more required battery chargers are not capable of being powered from their associated OPERABLE EDGs. ITS LCO 3.8.1.b requires two unit EDGs to be OPERABLE and capable of supplying the onsite Class 1E power distribution subsystem(s) and ITS LCO 3.8.1.d requires one or both opposite unit EDG(s) to be OPERABLE and capable of supplying power to equipment as required by LCO 3.5.2, LCO 3.7.10, LCO 3.7.11, and LCO 3.8.4 (Refer to DOC M06 for discussion of change to CTS LCO 3.8.1.1). ITS 3.8.1, ACTION F, requires, when one unit EDG and one required opposite unit EDG are inoperable, or both required opposite unit EDGs are inoperable, verifying the following equipment shared between units is capable of being powered from OPERABLE EDGs: two high head safety injection (HHSI) subsystems; two control room air handling units (AHUs); one CREVS train; and one CREATCS train (Refer to DOC M07 for discussion of change related to the addition of Required Actions F.2, F.3, and F.4). Required Action F.5 requires restoring one required EDG to OPERABLE status within 72 hours or in accordance with the RICT Program. This changes the presentation of the CTS by combining actions related to EDGs not capable of powering their associated HHSI pumps or battery chargers. This change is designated as administrative because the technical requirements of the specifications have not changed.	3.8.1.d	3.8.1.1, Action d.2 3.8.2.1

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ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
(continued)			
3.8.2 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.8.2	3.8.1.2
3.8.2 A02	CTS 3.8.1.2.a states that one startup transformer and associated circuits, or an alternate circuit, between the offsite transmission network and the 4160-volt bus, A or B, shall be OPERABLE. ITS 3.8.2 states that one qualified circuit, or an alternate circuit, between the offsite transmission network and the onsite Class 1E AC electrical power distribution subsystem(s) required by Limiting Condition for Operation (LCO) 3.8.10, "Distribution Systems – Shutdown" must be OPERABLE. This changes the CTS by defining the startup transformer and associated circuits as the "qualified circuit" and directing the user to ITS 3.8.10 instead of listing the buses the qualified circuit is to be connected to.	3.8.2.a	3.8.1.2.a
3.8.3 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.8.3	3.8.1.1
3.8.3 A02	CTS LCO) 3.8.1.1 and LCO 3.8.1.2 state the requirements for the AC Sources during operating and shutdown conditions, respectively. These requirements are used to form the LCO and Applicability for the ITS diesel fuel oil, lube oil, and starting air Specification. ITS LCO 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air," states that the stored diesel fuel oil, lube oil, and starting air subsystem shall be within limits for each required Emergency Diesel Generator (EDG). The Applicability for this requirement is when the associated EDG is required to be OPERABLE. This changes the CTS by combining the requirements for diesel fuel oil and diesel lube oil and starting air subsystem into one Specification.	LCO 3.8.3	3.8.1.1 3.8.1.2
3.8.3 A02 (continued)	This change is designated as administrative because the technical requirements of the specifications have not changed.		

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.8.3 A03	CTS 3.8.1.1b.1)b requires a common Fuel Storage System containing a minimum volume of 38,000 gallons of fuel for the Unit 3 EDGs. CTS 3.8.1.1b.1)b, footnote ** modifies this requirement by stating, "A temporary Class III fuel storage system containing a minimum volume of 38,000 gallons of fuel oil may be used for up to 10 days during the performance of Surveillance Requirement 4.8.1.1.2i.1 for the Unit 3 storage tank while Unit 3 is in Modes 5, 6, or defueled. If the diesel fuel oil storage tank is not returned to service within 10 days, Technical Specification 3.8.1.1 Action b and 3.8.1.2 Action apply to Unit 4 and Unit 3 respectively." CTS 4.8.1.1.2i and CTS 3.8.1.2b.2 are modified by a similar Footnote. Although CTS 3.8.1.1b.1b footnote ** and CTS 3.8.1.2b.2 footnote ** identify the referenced Surveillance Requirement (SR) as 4.8.1.1.2i.1, the correct SR is 4.8.1.1.2i that was changed under PTN License Amendment 263 and 258 (ML15166A320) but missed for these two footnotes. CTS 4.8.1.1.2i requires draining each fuel oil storage tank, removing the accumulated sediment, and cleaning the tank, and is proposed to be relocated (see DOC LA03). ITS 3.8.3 does not include this maintenance activity and is replacing the SR with the tank cleaning activity. This change is designated as administrative because the technical requirements of the specifications have not changed.	LCO 3.8.3 Note	3.8.1.1b.1)b 3.8.1.2.b
3.8.3 A04	CTS 3.8.1.1b requires three separate and independent EDGs to be operable and lists the subsystem parameters that must be included. CTS 3.8.1.2 states that one EDG must be OPERABLE and lists the subsystem parameters that must be included. ITS 3.8.3 Actions Table is modified by a Note indicating that separate Condition entry is allowed for each EDG. This changes the CTS by explicitly stating that the Action are directed towards a specific separate and independent EDG and have separate entry.	3.8.3 ACTIONS Note	3.8.1.1.b

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	This change is designated as administrative because the technical requirements of the specifications have not changed.		
3.8.3 A05	CTS 3.8.1.1b requires three separate and independent EDGs to be operable and lists the subsystem parameters that must be included. CTS 3.8.1.2 states that one EDG must be OPERABLE and lists the subsystem parameters that must be included. CTS LCO 3.0.2 requires that upon discovery of a failure to meet an LCO, the actions shall be met. ITS 3.8.3 provides an additional LCO associated with EDG fuel oil, lube oil, and starting air with associated surveillances defining when the LCO is met and Actions to take when the LCO is not met. ITS 3.8.3, ACTION F, is added to state under what condition associated with LCO 3.8.3 the associated EDG must be declared inoperable. This changes the CTS by provide a specific action for declaring the associated EDG inoperable. This change is designated as administrative because the technical requirements of the specifications have not changed.	3.8.3 ACTION F	3.8.1.1.b 3.8.1.2
3.8.4 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.8.4	3.8.2.1
3.8.4 A02	CTS 3.8.2.1 requires, in part, a 125-volt DC battery bank and a full capacity charger for each of four direct current (DC) electrical sources. ITS LCO 3.8.4 requires that four trains of the DC electrical power subsystem shall be OPERABLE. This changes the CTS by changing the statement that the following DC electrical sources shall be OPERABLE, then listing the required sources and combining the requirements for the battery, battery charger, and battery charger power supply into one separate Specification stating four trains of the DC electrical power subsystem shall be OPERABLE.	LCO 3.8.4	3.8.2.1

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	This change is designated as administrative because the technical requirements of the specifications have not changed.		
3.8.4 A03	CTS 3.8.2.1, ACTION b, states, in part, that with one of the required battery banks inoperable, or with none of the full-capacity chargers associated with a battery bank OPERABLE, restore all battery banks to OPERABLE status and at least one charger associated with each battery bank to OPERABLE status. ITS 3.8.4, ACTION B and ACTION C, state, in part, that with one DC electrical power train inoperable to restore the DC electrical power train to OPERABLE status. This changes the CTS by describing the Condition and Required Action as a train (battery bank and associated charger) instead of listing the train components separately. This change is designated as administrative because the technical requirements of the specifications have not changed.	3.8.4 ACTION B ACTION C	3.8.2.1 Action b
3.8.4 A04	CTS 3.8.2.1, Action b, includes a statement that the action applies to both units simultaneously. ITS 3.8.4, does not explicitly state that the ACTIONS apply to both units since the statement is redundant to the requirements of CTS 3.0.5.a (ITS LCO 3.0.10.a). This changes the CTS by deleting redundant detail. This change is solely a presentation preference and is designated as administrative because it does not result in a technical change to the CTS.	3.8.4	3.8.2.1 Action b

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.8.4 A05	CTS 4.8.2.1.d requires a battery service test for the batteries. The Surveillance specifies that the testing be performed during shutdown conditions and is modified by footnote **. Footnote ** provides an exception to the "during shutdown" condition stating that except that the spare battery bank D-52, and any other battery out of service when spare battery bank D-52 is in service may be tested with simulated loads during operation. ITS Surveillance Requirement (SR) 3.8.4.3 requires a similar verification of battery capacity and is modified by a similar Note. ITS SR 3.8.4.3, Note 2, states that for the battery service test the Surveillance shall not be performed on in-service batteries in MODE 1, 2, 3, or 4; however, credit may be taken for unplanned events that satisfy this SR. This changes the CTS requirement by specifying conditions for when the associated vital batteries are tested. This change is designated as administrative because the technical requirements of the specifications have not changed.	SR 3.8.4.3	4.8.2.1.d
3.8.5 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.8.5	3.8.2.2
3.8.5 A02	CTS 3.8.2.2 requires, in part, three 125-volt battery banks, each with at least one associated full capacity charger capable of being powered by an OPERABLE Emergency Diesel Generator (EDG). ITS LCO 3.8.5 requires three trains of the DC electrical power subsystem to be OPERABLE. This changes the CTS by combining the individual components, battery bank, charger, and EDG requirements into one separate Specification. This change is designated as administrative because it does not result in technical changes to the CTS.	LCO 3.8.5	3.8.2.2

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ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.8.5 A03	CTS 3.8.2.2 (ITS 3.8.5) is applicable in MODES 5 and 6. The CTS 3.8.2.2 Applicability is modified by a Note which states, "CAUTION – If the opposite unit is in MODES 1, 2, 3, or 4, see the corresponding Limiting Condition for Operation 3.8.2.1." ITS 3.8.5 does not contain a similar Note. This changes the CTS by deleting a requirement that is redundant to CTS 3.0.5, which is retained in ITS. This change is designated as administrative because it does not result in technical changes to the CTS.	3.8.5 Applicability	3.8.2.2 Applicability
3.8.6 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.8.6	3.8.2.1 3.8.2.2
3.8.6 A02	CTS 3.8.2.1 is applicable during MODES 1, 2, 3, and 4. CTS 3.8.2.2 is applicable during MODES 5 and 6. ITS LCO 3.8.6 requires the Battery parameters for the 125 VDC electrical power subsystem to be within limits when the associated DC electrical power trains are required to be OPERABLE. This changes the CTS by replacing the actual MODES with the phrase "When the associated DC electrical power trains are required to be OPERABLE." This clarification change is designated as administrative because it does not result in technical changes to the CTS.	LCO 3.8.6 Applicability	3.8.2.1 3.8.2.2 Applicability
3.8.6 A03	CTS 3.8.2.1 contains a table that describes battery degradation levels where separate actions are taken for each battery depending on the level of degradation. ITS 3.8.6 ACTIONS Note states that separate condition entry is allowed for each battery. This changes the CTS by explicitly stating the intent of CTS.	3.8.6 ACTIONS Note	3.8.2.1 3.8.2.2

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	This clarification change is designated as administrative because it does not result in technical changes to the CTS.		
3.8.6 A04	CTS 4.8.2.1.e and CTS 4.8.2.1.f require a battery discharge test for the batteries. The Surveillance specifies that the testing be performed during shutdown conditions and is modified by footnote **. Footnote ** provides an exception to the "during shutdown" condition stating that except for the spare battery bank D52, and any other battery out of service when spare battery bank D-52 is in service may be tested with simulated loads during operation. ITS Surveillance Requirement (SR) 3.8.6.6 requires a similar verification of battery capacity and is modified by a similar Note. ITS SR 3.8.6.6, Note states that for the battery discharge test the Surveillance shall not be performed on in-service batteries in MODE 1, 2, 3, or 4; however, credit may be taken for unplanned events that satisfy this SR. This changes the CTS requirement by specifying conditions for when the associated batteries are tested. This clarification change is designated as administrative because it does not result in technical changes to the CTS.	SR 3.8.6.6	4.8.2.1.e 4.8.2.1.f
3.8.7 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.8.7	3.8.3.1
3.8.7 A02	CTS LCO 3.8.3.1, ACTION c, states, in part, that with one AC Vital Bus either not energized from its associated Inverter, or with the inverter not connected to its associated DC Bus, re-energize the AC Vital Bus from its associated inverter connected to its associated DC Bus within 24 hours. ITS LCO 3.8.7, ACTION A, states with one inverter inoperable, restore the Inverter to OPERABLE status within 24 hours. Required Action A	3.8.7 Required Action A.1	3.8.3.1 Action c

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	is modified by a note that states, “Enter applicable Condition and Required Actions of LCO 3.8.9, ‘Distribution Systems – Operating,’ with any AC vital bus deenergized.” This changes the CTS by adding a note that references the requirements for ITS LCO 3.8.9. This clarification change is designated as administrative because it does not result in technical changes to the CTS.		
3.8.8 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.8.8	3.8.3.2
3.8.8 A02	CTS 3.8.3.2 requires, in part, that as a minimum, the following electrical busses shall be energized in the specified manner, listing two associated inverters connected to their respective DC busses. ITS 3.8.8 requires that two inverters shall be OPERABLE. This changes the CTS by providing a specific LCO for inverters. This clarification change is designated as administrative because it does not result in technical changes to the CTS.	3.8.8	3.8.3.2
3.8.8 A03	CTS 3.8.3.2 (ITS 3.8.8) is applicable in MODES 5 and 6. The CTS 3.8.3.2 Applicability is modified by a Note *** which states, “CAUTION – If the opposite unit is in MODES 1, 2, 3, or 4, see the corresponding Limiting Condition for Operation 3.8.3.1.” ITS 3.8.8 does not contain a similar Note. This changes the CTS by deleting a requirement that is redundant to CTS 3.0.5, which is retained in ITS. This clarification change is designated as administrative because it does not result in technical changes to the CTS.	3.8.8	3.8.3.2 Applicability

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.8.9 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.8.9	3.8.3.1
3.8.9 A02	CTS 3.8.3.1, Actions c and d, includes a statement that the action applies to both units simultaneously. ITS 3.8.9, does not explicitly state that the ACTIONS apply to both units since the statement is redundant to the requirements of CTS 3.0.5.a (ITS LCO 3.0.10.a). This changes the CTS by deleting redundant detail. This clarification change is designated as administrative because it does not result in technical changes to the CTS.	3.8.9	3.8.3.1 Action c Action d
3.8.9 A03 3.8.9 A03 (continued)	CTS 3.8.3.1 provides requirements for electrical buses to be energized. A Note to the Actions of CTS 3.8.3.1 requires entry into the applicable Actions of LCO 3.8.2.1, “DC Sources – Operating,” for DC trains made inoperable by inoperable AC power distribution system. CTS 3.8.3.1, Action b, provides the required actions for the condition with any of the required load centers (LCs) and/or motor control centers (MCCs) associated with the opposite unit inoperable. The required actions stated in Action b is to restore the inoperable LC or MCC to OPERABLE status in accordance with Table 3.8-1 or Table 3.8-2, as applicable, or shutdown the unit. CTS Table 3.8-1 provides an allowable outage time (AOT) of 2 hours for LCs 4B, 4C, and 4H, and MCCs 4B, 4C, and 4D with three footnotes. The * footnote states, “If the battery charger powered from the out-of-service LC and/or MCC is not required by LCO 3.8.2.1, the out-of-service time is not applicable (N/A). The ** footnote states, “If neither of the battery chargers powered from the out-of-service LC and/or MCC is required by LCO 3.8.2.1, the out-of-service time is 72 hours or in accordance with the RICT Program. Footnote a provides an additional AOT of in accordance with the RICT Program. CTS Table 3.8-2 provides similar AOT requirements for LCs 3B, 3C, and 3H, and MCCs 3B, 3C, and 3D. This clarification change is designated as administrative because it does not result in technical changes to the CTS.	3.8.9	3.8.3.1 Table 3.8-1 Table 3.8-2

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.8.10 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.8.10	3.8.1.2 3.8.3.2
3.8.10 A02	CTS 3.8.3.2 (ITS 3.8.10) is applicable in MODES 5 and 6. The CTS 3.8.3.2 Applicability is modified by a Note *** which states, "CAUTION – If the opposite unit is in MODES 1, 2, 3, or 4, see the corresponding Limiting Condition for Operation 3.8.3.1." ITS 3.8.10 does not contain a similar Note. This changes the CTS by deleting a requirement that is redundant to CTS 3.0.5, which is retained in ITS. This clarification change is designated as administrative because it does not result in technical changes to the CTS.	3.8.10	3.8.3.2 Applicability
3.8.10 A03	CTS 3.8.3.2 requires one train of A.C. emergency busses associated with the unit consisting of, in part, three 480-volt A.C. emergency busses load centers. The 480V load center requirement is modified by footnote * which states, "With the opposite unit in MODE 1, 2, 3, or 4, the 480-volt load centers can only be cross-tied upon issuance of an engineering evaluation to prevent exceeding required electrical components maximum design ratings and to ensure availability of the minimum required equipment." ITS LCO 3.8.10 requires the necessary portion of AC and DC electrical power distribution trains, and AC vital electrical power distribution subsystems shall be OPERABLE to support equipment required to be OPERABLE. This changes the CTS by not including the statement when 480V load centers can be cross-tied. This clarification change is designated as administrative because the deleted requirement has already been accomplished and, thus, does not result in a technical change to the CTS.	3.8.10	3.8.3.2

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
Refer to DOC section in ML23151A452	Section 3.9, Refueling Operations		
3.9.1 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.9.1	3.9.1
3.9.1 A02	CTS 3.9.1 requires, in part, that with the reactor vessel head closure bolts less than fully tensioned or with the head removed, that the boron concentration of the RCS and the refueling canal shall be maintained. Additionally, CTS 3.9.1 Applicability is MODE 6 and contains a Note (Note *) which states that the reactor shall be maintained in MODE 6 whenever fuel is in the reactor vessel with the vessel head closure bolts less than fully tensioned or with the head removed. ITS LCO 3.9.1 requires, in part, that the boron concentration of the RCS and the refueling canal shall be maintained. Furthermore, ITS LCO 3.9.1 Applicability is MODE 6. This changes the CTS by not including wording about the reactor vessel head closure bolts less than fully tensioned or the head removed. This clarification change is designated as administrative because it does not result in technical changes to the CTS.	3.9.1 Applicability	3.9.1 Applicability

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.9.1 A03	CTS 3.9.1 provides requirements on the boron concentration of all filled portions of the RCS and the refueling canal. Additionally, CTS 4.9.1.2 requires a determination of the boron concentration of the RCS and the refueling canal. ITS 3.9.1 provides requirements on the boron concentration of the RCS, which includes the refueling canal and the refueling cavity as specified in the ITS Bases. This changes the CTS by including the refueling cavity in the volumes required to have boron concentration maintained, which will be specified in the TS Bases. This clarification change is designated as administrative because it does not result in technical changes to the CTS.	3.9.1	3.9.1
3.9.2 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.9.2	3.9.10
3.9.3 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.9.3	3.9.2
3.9.3 A02	CTS 3.9.2 ACTION a requires actions when one of the required Source Range Neutron Flux Monitor is inoperable or not operating. ITS 3.9.3 requires actions when one of the required Source Range Neutron Flux Monitor is inoperable. This changes the CTS by not specifically stating action is required when one of the required Source Range Neutron Flux Monitor is not operating. This change is considered administrative because removing the specific requirement for the Source Range Neutron Flux Monitor to be operating does not affect the monitors, which are required to be operating to be OPERABLE.	3.9.3	3.9.2 Action a

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.9.3 A03	CTS 3.9.2 ACTION a refers to suspending all operations involving CORE ALTERATIONS or positive reactivity changes when one required Source Range Neutron Flux Monitor is inoperable. ITS 3.9.3 ACTION A refers to suspending movement of fuel, sources, and reactivity control components within the reactor vessel and positive reactivity additions. This changes the CTS by not requiring the suspension of CORE ALTERATIONS, but suspension of movement of fuel, sources, and reactivity control components. This change is considered administrative because the requirements in the ITS are essentially equivalent to the requirement in the CTS to suspend CORE ALTERATIONS.	3.9.3 ACTION A	3.9.2 Action a
3.9.3 A04	CTS Surveillance Requirement (SR) 4.9.2.c requires an analog CHANNEL OPERATIONAL TEST (COT) be performed. ITS SR 3.9.3.2 requires a COT to be performed. This changes the CTS by just requiring a COT versus an analog COT, which is consistent with NUREG-1431, Revision 5. NUREG-1431, Revision 5, combines the digital COT and analog COT into one definition of COT (see ITS Chapter 1.0 conversion package, DOCs L01 and A04, for the discussion of combining the two for PTN). This change is considered administrative because there is no change in how the COT SR is performed.	SR 3.9.3.2	4.9.2.c
3.9.4 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.9.4	3.9.4 3.9.9
3.9.4 A02	CTS 3.9.9 ACTION b states the provisions of 3.0.3 are not applicable. ITS 3.9.4 ACTIONS do not contain this requirement. This changes the CTS by eliminating the provision that LCO 3.0.3 is not applicable. Deletion of the requirement is designated as administrative because the provision does not accomplish anything.	3.9.4	3.9.9 Action b

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.9.5 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.9.5	3.9.8.1
3.9.5 A02	CTS 3.9.8.1 ACTION requires closure of containment penetrations when no Residual Heat Removal (RHR) trains are in operation. ITS 3.9.5 contains the same requirement but lists the equipment hatch and personnel air locks specifically in the ITS Actions. This changes the CTS by specifically listing penetrations to be closed if there are no RHR trains in operation. This change is designated as administrative because it does not result in any changes, besides listing the equipment hatch and personnel air lock.	3.9.5 ACTION A	3.9.8.1 Action
3.9.6 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	3.9.6	3.9.8.2

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
3.9.6 A02	CTS 3.9.8.2 ACTION b requires closure of containment penetrations when no Residual Heat Removal (RHR) trains are in operation. ITS 3.9.6 ACTION B contains the same requirement but lists the equipment hatch and personnel air locks specifically in the ITS Actions. This changes the CTS by specifically listing penetrations to be closed if there are no RHR trains in operation. This change is designated as administrative because it does not result in any changes, besides listing the equipment hatch and personnel air lock.	3.9.6 ACTION B	3.9.8.2 Action b
Refer to DOC section in ML23151A453	Chapter 4.0, Design Features		
4.0 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	4.0 4.1 4.2 4.3.1 4.3.2 4.3.3	5.0 5.1 5.3 5.5.1 5.5.2 5.5.3
4.0 A02	CTS Section 5.5.1.2.a requires the racks for new fuel storage to be designed and maintained with a nominal 21-inch center-to-center spacing to assure K_{eff} equal to or less than 0.95 for fully flooded conditions. ITS Section 4.3.1.2.d requires equivalent requirements but requires the fully flooded conditions to be with unborated water. This changes the CTS by requiring the K_{eff} to be equal to or less than 0.95 when fully flooded with unborated water.	4.3.1.2.d	5.5.1.2.a

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	This change is considered administrative because it adds descriptive design information that is already inherent in the design of the new fuel storage racks.		
4.0 A03	CTS Sections 5.5.1.1.e and 5.5.1.1.f discuss storage requirements for fuel assemblies in relation to cask area storage. ITS Section 4.3.1.1 does not contain this information. The requirements of CTS Sections 5.5.1.1.e and 5.5.1.1.f are redundant to the fuel assembly storage requirements contained in proposed PTN ITS 3.7.14, “Spent Fuel Storage.” This changes the CTS by omitting these redundant requirements ITS Section 4.3.1.1. This change is considered administrative and is acceptable because the change does not result in technical changes to the CTS.	3.7.14	5.5.1.1.e 5.5.1.1.f
Refer to DOC section in ML22089A454	Chapter 5.0, Administrative Controls		
5.1 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	5.1	6.1.1 6.1.2
5.2 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	5.2	6.2.1 6.2.2 6.2.3
5.2 A02	CTS 6.2.1.a requires the organizational charts to be documented in the Quality Assurance (QA) Topical Report and updated in accordance with 10 CFR 50.54(a)(3). ITS 5.2.1.a contains the requirement for the organizational charts to be documented in the QA Topical Report but does not specifically require it to be updated in accordance with 10 CFR 50.54(a)(3). This changes the CTS by not stating in ITS Chapter 5.0 to update	5.2.1.a	6.2.1.a

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ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	the organizational charts located in the QA Topical Report per the *Code of Federal Regulations*. This change is considered administrative since there will be no changes in the requirement to update the QA programs in accordance with the *Code of Federal Regulations* (CFR).		
5.2 A03 5.2 A03 (continued)	CTS 6.2.1.d and CTS 6.2.1.e allow the individuals that train the operating staff (6.2.1.d), the individuals who carry out QA functions (6.2.1.d) and health physics individuals (6.2.1.e) to report to the appropriate onsite manager but have sufficient organizational freedom to be independent from operating pressure or, in the case of health physics supervisor, have direct access to the onsite individual having responsibility for overall unit management. In addition, CTS 6.2.1.e states that health physics personnel shall have the authority to cease any work activity when worker safety is jeopardized or in the event of unnecessary personnel radiation exposures. ITS 5.2.1.d states that the individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures. The ITS retains the requirement to comply with 10 CFR 50.54 and the Nuclear Fleet Industrial Safety Program states that each employee shall have “Stop Work Authority” if the individual observes unsafe working conditions or behaviors. This change is considered administrative since there will be no changes in the requirement for these individuals to have sufficient organizational freedom to be independent from operating pressure and to stop work if unsafe working conditions or behaviors are observed.	5.2.1.d	6.2.1.d 6.2.1.e
5.2 A04	CTS 6.2.2.a, which refers to Table 6.2-1, requires an individual (Shift Technical Advisor (STA)) to provide advisory technical support to the unit operations shift crew and to be specifically be manned in MODES 1, 2, 3, or 4. ITS 5.2.2.e requires an individual to provide advisory technical support to the unit operations shift crew but is revised to eliminate reference to the STA position, when the position must be manned, and the	5.2.2.e	6.2.2.a

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	details of who may fill the STA role for both units. This changes the CTS by eliminating the inference that the STA role is a separate shift crew position instead of a function. This change is designated as administrative because an individual with engineering expertise (i.e., dedicated individual or dual role individual) will continue to be required on shift and this same individual may provide support to both units as allowed by NUREG-0737, “Clarification of [Three Mile Island]TMI Action Plan Requirements,” (ML051400209).		
5.2 A05	CTS 6.2.2.e, in part, includes a description of who specifically may provide advisory technical support to the unit operations shift crew: either a dedicated STA, a shift manager who meets the qualifications for the STA as required by TS6.2.3.1, or an individual assigned to the unit with a Senior Reactor Operator’s license who meets the qualifications for the STA as required by TS6.2.3.1. ITS 5.2.2.e requires an individual to provide advisory technical support to the unit operations shift crew but is revised to eliminate the details of who is qualified to assume the duties. This changes the CTS by eliminating details regarding the individual assigned to provide technical advisory support to the unit operations shift crew. This change is designated as administrative because an individual with engineering expertise and appropriate qualifications will continue to be required on shift.	5.2.2.e	6.2.2.e
5.2 A06	CTS 6.2.1.a states, in part, that lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. Those relationships shall be documented and updated, as appropriate, in the form of organizational charts. These organizational charts will be documented in the Quality Assurance Topical Report (QATR). ITS 5.2.1.a provides a similar requirement however, states, in part, that these requirements shall be documented in the QATR or the Updated Final Safety Analysis Report (UFSAR). This changes the CTS by allowing the requirements of CTS 6.2.1.a to be documented in the UFSAR in addition to the QATR.	5.2.1.a	6.2.1.a

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	This change is considered administrative because there are no changes in the technical requirements only in the location of the documentation.		
5.3 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	5.3.1	6.3
5.3 A02	CTS 6.3.1.2 and 6.3.1.3 provide specific requirements for the operations manager and licensed operators, respectively, pointing to other Specifications or regulations. ITS 5.3.1 does not include these requirements. This changes the CTS by deleting explicit administrative requirements for these positions. This change is considered administrative since there will be no changes to the requirements that must be met for these individuals.	5.3.1	6.3.1.2 6.3.1.3
5.4 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	5.4	6.8
5.5 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	5.5	4.7.5 4.8.2.1 6.8.4
5.5 A02	The Surveillances associated with the ventilation filter testing for the Control Room Emergency Ventilation System (CREVS) has been placed in a program in the proposed Administrative Controls Chapter 5.0 (ITS 5.5.8). As such, a general program statement has been added as ITS 5.5.8. A statement of the applicability of ITS Surveillance Requirement (SR) 3.0.2 and SR 3.0.3 is needed to clarify that the allowances for	5.5.8	None

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	Surveillance Frequency extensions do apply (as allowed in the CTS). This changes the CTS by moving the ventilation filter testing Surveillances associated with the CREVS to a program in ITS 5.5 and specifically stating the applicability of ITS SR 3.0.2 and SR 3.0.3 in the program. This change is designated as administrative because it does not result in technical changes to the CTS.		
5.5 A03	CTS 6.8.4.j.d states, in part, that the SG inspection objective is of detecting flaws of any type (e.g., volumetric flaws, axial and circumferential cracks) that may be present along the length of the tube, from the tube-to-tubesheet weld at the tube inlet to the tube-to-tubesheet weld at the tube outlet, and that may satisfy the applicable tube plugging criteria. That the portion of the tube below 18.11 inches from the top of the tubesheet is excluded from inspection. ITS 5.5.6.d states, in part, that the SG inspection objective is of detecting flaws of any type (e.g., volumetric flaws, axial and circumferential cracks) that may be present along the length of the tube, from the tube-to-tubesheet weld at the tube inlet to the tube-to-tubesheet weld at the tube outlet except for any portions of the tube that are exempt from inspection by alternate repair criteria, and that may satisfy the applicable tube plugging criteria. This changes the CTS by replacing the specific dimension of the portion of the tube excluded from the inspection, which is listed in paragraph c.1, with a statement that excludes that part of the tube exempt from inspection by alternate repair criteria. This change is designated as administrative because it does not result in technical changes to the CTS.	5.5.6.d	6.8.4.j.d
5.5 A04	CTS 6.8.4.j.d.2 includes two footnotes (footnote * and footnote **) that support a one-time extension of the 4th inspection period and a one-time extension to perform SG inspections for Unit 3 and expires after the Cycle 32 refueling outage in Fall of 2021. ITS 5.5.6, "Steam Generator Program," does not include these one-time extensions. This changes the CTS by deleting the allowance for these one-time extensions. This change is designated as administrative because it does not result in technical changes to the CTS.	None	6.8.4.j.d.2

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ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
5.5 A05	CTS 6.8.4.k.d requires, in part, that the Control Room Envelope Habitability Program include measurement, at designated locations, of the Control Room Envelope (CRE) pressure relative to external areas adjacent to the CRE boundary during the pressurization mode of operation of the CREVS, operating at the flow rate required by SR 4.7.5.d. ITS 5.5.15.d requires, in part, that the Control Room Envelope Habitability Program include measurement, at designated locations, of the CRE pressure relative to external areas adjacent to the CRE boundary during the pressurization mode of operation of the CREVS, operating at the flow rate required by the Ventilation Filter Test Program (VFTP). The CTS 4.7.5.d flow rate of 1000 ± 10 cfm is being placed in the new VFTP; therefore, the flow rate value is not changed. This change is designated as administrative because it does not result in technical changes to the CTS.	5.5.15.d	6.8.4.k.d
5.5 A06	CTS 6.8.4.q, Safety Function Determination Program (SFDP) states that this program ensures loss of safety function is detected and appropriate actions taken, and other appropriate actions may be taken as a result of the support system inoperability. ITS 5.5.12 states that other appropriate limitations and remedial or compensatory actions may be taken as a result of the support system inoperability. The changes the CTS by adding additional clarification on what other appropriate action may be taken, limitation, remedial, or compensatory. This change is designated as administrative because it does not result in technical changes to the CTS.	5.5.12	6.8.4.q
5.5 A07	The CTS format is to label remedial actions with their associated prescribed period for completion as “ACTION” and “allowed outage time.” ITS format is to label these same remedial action and prescribed completion periods as “Condition and Required Action” and “Completion Time.” This changes the CTS by providing a new label for the remedial actions and associated period for completion.	5.5	6.8.4.q

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
	This change is designated as administrative because it does not result in technical changes to the CTS.		
5.5 A08	CTS 6.8.4.h requires the performance of containment leakage rate testing in accordance with 10 CFR 50, Appendix J, Option B, except as modified by NRC approved exemptions. CTS 4.0.3 provides time to perform a missed Surveillance when it is discovered that a Surveillance was not performed within its specified frequency. ITS 5.5.13 also requires the performance of containment leakage rate testing in accordance with 10 CFR 50, Appendix J, Option B, except as modified by NRC approved exemptions. ITS 5.5.13.e states that the provisions of SR 3.0.3 are applicable to the Containment Leakage Rate Testing Program. This changes the CTS by explicitly adding the statement that the provisions of SR 3.0.3 are applicable to the Containment Leakage Rate Testing Program. This change is designated as administrative because it does not result in technical changes to the CTS.	5.5.13	6.8.4.h
5.5 A09	CTS 6.8.4.h specifies the requirements for the Containment Leakage Rate Testing Program. CTS 6.8.4.h contains the following exception related to testing of airlock door seals: "A vacuum test will be performed in lieu of a pressure test for airlock door seals at the required intervals (Amendment Nos. 73 and 77, issued by NRC November 11, 1981)." ITS 5.5.13, "Containment Leakage Rate Testing Program," does not contain this exception. This exception will be retained in the ITS but modified to include the actual test frequency in lieu of referencing the aforementioned amendments. This changes the CTS by replacing reference to the amendments with the appropriate test frequency. This change is designated as administrative because it does not result in technical changes to the CTS.	5.5.13	6.8.4.h

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
5.5 A10	CTS 6.8.4.j.c provides an exception to the 40% tube plugging criteria of the SG Program. The exception states, in part, the certain criteria “shall” be applied. ISTS 5.5.8.c contains this same exception but uses the term “may” in lieu of “shall”. This changes the CTS by replacing “shall” with the ISTS term “may” in ITS 5.5.6.c. This change is designated as administrative because it does not result in technical changes to the CTS.	5.5.6.c	6.8.4.j.c
5.5 A11	CTS 6.8.4.h states that the provisions of CTS 4.0.2 are not applicable to the Containment Leakage Rate Testing Program. ITS 5.5.13 does not contain a similar statement but instead contains the following: “Nothing in these Technical Specifications shall be construed to modify the testing Frequencies required by 10 CFR 50, Appendix J.” The ITS statement is equivalent to the CTS statement that CTS 4.0.2 is not applicable. This changes the CTS by adopting the ISTS 5.5.15.f statement in lieu of the CTS 4.0.2 statement. This change is designated as administrative because it does not result in technical changes to the CTS.	5.5.13	6.8.4.h
5.6 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designated as administrative changes and do not result in technical changes to the CTS.	5.6	Table 3.3-5 6.9.1 6.9.2

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
5.6 A02	CTS 6.9.1.7 requires changes to the Core Operating Limits Report (COLR) to be submitted to the NRC Document Control Desk with copies to the Regional Administrator and Resident Inspector, unless otherwise approved by the Commission. ITS 5.6.3.d requires changes to the COLR to be provided to the NRC. This changes the CTS by not specifically requiring COLR changes to be sent to the NRC Document Control Desk, Regional Administrator, and Resident Inspector. This change is listed as administrative because it deletes duplicate information located in 10 CFR 50.4 requirements.	5.6.3.d	6.9.1.7
5.6 A03	CTS 6.9.1.7 states, in part, that the "AFD, $F_Q(Z)$, F_DH, K(Z), Safety Limits, Overtemperature ΔT, Overpower ΔT, Shutdown Margin – T_{avg} > 200°F, Shutdown Margin -T_{avg} < 200°F, Moderator Temperature Coefficient, DNB Parameters, and Rod Bank Insertion Limits shall be determined such that all applicable limits of the safety analyses are met." ITS 5.6.3.c states this requirement more generically: "The core operating limits shall be determined such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems (ECCS) limits, nuclear limits such as SDM, transient analysis limits, and accident analysis limits) of the safety analyses are met." This changes the CTS by adopting the more generic requirement of the ITS. This change is designated as administrative because it does not result in technical changes to CTS.	5.6.3.c	6.9.1.7
5.6 A04 5.6 A04	CTS 6.9.1.7 requires analytical methods used to determine FQ(Z), FΔH and the K(Z) curve be those previously reviewed and approved by the NRC and lists the applicable fuel vendor topical reports associated with the full spectrum loss of coolant accident (LOCA) methodology. ITS 5.6.3 also requires analytical methods used to determine FQ(Z), FΔH and the K(Z) curve be those previously reviewed and approved by the NRC and lists the topical reports associated with the full spectrum LOCA methodology and the previously NRC approved topical reports prior to issuance of PTN license amendments approving the use of the full spectrum LOCA methodology. Two Notes are added to clarify when each of the listed topical reports are applicable. Topical reports used to	5.6.3	6.9.1.7

Table A – Administrative Changes

ITS/CTS No. and Discussion of Changes (DOC) No.	Description of Change	ITS Requirement	CTS Requirement
(continued)	determine core parameters prior to PTN license amendments associated with the full spectrum LOCA methodology are only applicable to Unit 3 through Core Operating Cycle 32 and Unit 4 through Core Operating Cycle 33. Topical reports used to determine core parameters associated with the full spectrum LOCA methodology are not applicable to Unit 3 until Core Operating Cycle 33 and Unit 4 until Core Operating Cycle 34. This changes the CTS by including previously NRC approved topical reports to support determining core parameters until the topical reports associated with the full spectrum LOCA methodology become effective. This change is designated as an administrative change because it provides clarification of application requirements and does not result in technical changes to the CTS.		
5.7 A01	In the conversion of the PTN CTS to the plant-specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with ISTS. These changes are designed as administrative changes and do not result in technical changes to the CTS.	5.7	6.12
5.7 A02	CTS 6.12.1 states, in part, “and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP).” ITS 5.7.1.b states, in part, that access to, and activities in, each such area shall be controlled by means of a Radiation Work Permit (RWP) or equivalent that includes specification of radiation dose rates in the immediate work area(s). This changes the CTS by specifying that the RWP shall include specification of radiation dose rates in the immediate work area(s). This is designated as administrative because it does not result in technical changes to the CTS.	5.7.1.b	6.12.1

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
Refer to DOC section in ML23151A441	**Chapter 1.0, Use and Application**			
1.0 L01	The CTS Chapter 1.0 definition of the ANALOG CHANNEL OPERATIONAL TEST, DIGITAL CHANNEL OPERATIONAL TEST, and ACTUATION LOGIC TEST requires the use of a simulated signal when performing the test. ITS Section 1.1 renames the CTS definitions of ANALOG CHANNEL OPERATIONAL TEST and DIGITAL CHANNEL OPERATIONAL TEST to CHANNEL OPERATIONAL TEST (COT) (discussed in DOC A04), uses the same name for ACTUATION LOGIC TEST, and allows the use of a simulated or actual signal when performing the tests. This changes the CTS by allowing the use of unplanned actuations to perform the Surveillance of each test based on the collection of sufficient information to satisfy the surveillance test requirements. This change is designated as less restrictive because it allows an actual signal to be credited for Surveillance where only a simulated signal was previously allowed.	1.1	1.2 1.3 1.11	None (see specific NSHC)
Refer to DOC section in ML23151A443	**Chapter 3.0, LCO and SR Applicability**			
3.0 L01	CTS Chapter 3.0 does not contain an allowance when barriers cannot perform the associated support function. The proposed change to CTS 3.0, “LCO Applicability” adds a new LCO 3.0.9. The addition of LCO 3.0.9 to the CTS is to address barriers which cannot perform the related support function for Technical Specification systems. ITS LCO 3.0.9 allows barriers to be able to not perform the associated safety function for up to 30 days before declaring the supported system inoperable. Furthermore, due to this addition, an allowance is also needed in LCO 3.0.1. This allowance has been added.	LCO 3.0.9	None	None

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	This is a less restrictive change since this allowance was not in CTS.			
3.0 L02	CTS 4.0.3 states, in part, "If it is discovered that a Surveillance was not performed within its specified frequency, then compliance with the requirement to declare the Limiting Condition of Operation not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance." ITS SR 3.0.3 states, in part, "If it is discovered that a Surveillance was not performed within its specified frequency, then compliance with the requirement to declare the Limiting Condition of Operation not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. The delay period is only applicable when there is a reasonable expectation the surveillance will be met when performed." This changes the CTS by adding, "The delay period is only applicable when there is a reasonable expectation the surveillance will be met when performed." This change is designated as less restrictive because an allowance to defer declaring affected equipment inoperable is extended to SRs that have not been performed if a reasonable expectation the surveillance will be met when performed can be shown.	SR 3.0.3	4.0.3	None

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
Refer to DOC section in ML23151A444	**Section 3.1, Reactivity Control Systems**			
3.1.1 L01	CTS 3.1.1.1 and CTS 3.1.1.2 Actions state when the SDM is less than the applicable limit, boration must be initiated immediately. ITS 3.1.1 ACTION states when SDM is not within limits, boration must be initiated within 15 minutes. This changes the CTS by relaxing the Completion Time from “immediately” to 15 minutes. This change is designated as less restrictive because additional time is allowed to restore parameters to within the LCO limits than was allowed in the CTS.	3.1.1 ACTION	3.1.1.1 Action 3.1.1.2 Action	3
3.1.1 L02	CTS 3.1.1.1 and CTS 3.1.1.2 Actions state when the SDM is “not within limits, immediately initiate and continue boration at greater than or equal to 16 gpm of a solution containing greater than or equal to 3.0 weight percentage (wt%) (5245 ppm) boron or equivalent until the required SHUTDOWN MARGIN is restored.” ITS 3.1.1 ACTION A states that when the SDM is not within limits to initiate boration to restore SDM to within limits. This changes the CTS by eliminating the specific values of flow rate and the boron concentration used to restore compliance with the LCO. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.1.1 ACTION A	3.1.1.1 Action 3.1.1.2 Action	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.1 L03	CTS 4.1.1.1.1.d requires verification that the SDM is within limit, "Prior to initial operation above 5% RATED THERMAL POWER after each fuel loading, by consideration of the factors of e below (CTS 4.1.1.1.1.e), with the control banks at the maximum insertion limit of Specification 3.1.3.6." The ITS does not contain a similar requirement. This changes the CTS by deleting Surveillance Requirement 4.1.1.1.1.d. This change is designated as less restrictive because Surveillances which are required in the CTS will not be required in the ITS.	None	4.1.1.1.1.d	5
3.1.2 L01	CTS 4.1.1.1.2 is applicable in MODES 1, 2, 3, and 4. ITS 3.1.2 is applicable in MODES 1 and 2. This changes the CTS by reducing the applicable MODES in which the core reactivity requirement must be met. This change is designated as less restrictive because the LCO requirements are applicable in fewer operating conditions than in the CTS.	3.1.2	4.1.1.1.2	2
3.1.2 L02	CTS 3.1.1.1 does not contain ACTIONS to follow if the core reactivity balance Surveillance is not met. If the core reactivity balance Surveillance is not met, CTS LCO 3.0.3 would be entered. CTS LCO 3.0.3 requires the plant to be in MODE 3 within 6 hours, MODE 4 within 12 hours, and MODE 5 within 24 hours. ITS 3.1.2 contains ACTIONS to follow if the core reactivity LCO is not met. If the LCO is not met, 7 days are provided to re-evaluate the core design and safety analysis, to determine that the reactor core is acceptable for continued operation, and to establish appropriate operating restrictions and SRs. If these actions are not completed within the 7 days, the plant must be placed in MODE 3 within 6 hours. This changes the CTS by providing 7 days to evaluate and provide compensatory measures for not meeting the core reactivity balance requirement and then requiring	3.1.2	3.1.1.1	4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.2 L02 (continued)	entry into MODE 3 instead of requiring an immediate shutdown and entry into MODE 5. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.			
3.1.2 L03	CTS 4.1.1.1.2 requires, in part, that the predicted reactivity values shall be adjusted (normalized) to correspond to the actual core conditions prior to exceeding a fuel burnup of 60 EFPD after each fuel loading. ITS SR 3.1.2.1 contains an SR Note that states the adjustment “may” be performed prior to exceeding a fuel burnup of 60 EFPD after each fuel loading. This changes the CTS by stating that the normalization may be performed prior to 60 EFPD after each fuel loading. This change is designated as less restrictive because less stringent SRs are being applied in the ITS than were applied in the CTS.	SR 3.1.2.1	4.1.1.1.2	6
3.1.3 L01	CTS 3.1.1.3 ACTION a.2 states that if the measured MTC is more positive than the BOL limit, then the control rod withdrawal limits established in ACTION a.1 must be maintained until subsequent calculation verifies that the MTC has been restored to within limits for all the rods withdrawn condition. ITS 3.1.3 does not contain a requirement that the control rod withdrawal limits must be maintained until MTC is confirmed to be within its limit by measurement. However, ITS LCO 3.0.2 states that the Required Actions shall be followed until the LCO is met or no longer applicable. The ITS 3.1.3 Bases state that physics calculations may be used to determine the time in cycle life at which the calculated MTC will meet the LCO requirement, and at this point in core life the condition may be exited and the control rod withdrawal limits removed. This changes the CTS	LCO 3.0.2 3.1.3 Bases	3.1.1.3 Action a.2	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.3 L01 (continued)	by eliminating the requirement to verify the MTC to be within its limit before removing the control rod withdrawal limits. This change is designated as less restrictive because Actions that are required in the CTS will not be required in the ITS.			
3.1.3 L02	CTS 4.1.1.3.b requires MTC to be determined within limits. "The MTC shall be measured at any THERMAL POWER and compared to the 300-ppm surveillance limit specified in the COLR (all rods withdrawn, RATED THERMAL POWER condition) within 7 EFPD after reaching an equilibrium boron concentration of 300 ppm*. In the event this comparison indicates the MTC is more negative than the 300-ppm surveillance limit specified in the COLR, the MTC shall be remeasured, and compared to the EOL MTC limit specified in the COLR, at least once per 14 EFPD during the remainder of the fuel cycle." ITS SR 3.1.3.2 requires verifying MTC is within the end of life (EOL) limit once each cycle. Additionally, ITS SR 3.1.3.2 is modified by three notes. The first Note states that ITS SR 3.1.3.2 is not required to be performed until 7 effective full power days (EFPD) after reaching the equivalent of an equilibrium RATED THERMAL POWER (RTP) all rods out (ARO) boron concentration of 300 ppm. The second Note states that if the MTC is more negative than the 300 ppm Surveillance limit (not LCO limit) specified in the COLR, then ITS SR 3.1.3.2 shall be repeated once per 14 EFPD during the remainder of the fuel cycle. The third Note states that ITS SR 3.1.3.2 does not need to be repeated if the MTC measured at the equivalent of equilibrium RTP-ARO boron concentration of ≤ 60 ppm is less negative than the 60 ppm Surveillance limit specified in the COLR. This changes the CTS by eliminating the requirement to verify that MTC is met at least once per 14 EFPD if the measured MTC at the equivalent of equilibrium RTP-ARO boron concentration of ≤ 60 ppm is less negative than the 60 ppm Surveillance limit specified in the COLR.	SR 3.1.3.2	4.1.1.3.b	7

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.3 L02 (continued)	This change is designated as less restrictive because Surveillances will be performed less frequently under the ITS than under the CTS.			
3.1.4 L01	CTS 3.1.3.1 ACTION a states, in part, with one or more full length rods inoperable due to being immovable as a result of excessive friction, determine that the SHUTDOWN MARGIN requirement of Specification 3.1.1.1 is satisfied within 1 hour. CTS 3.1.3.1 ACTION d.3 states, in part, with one full length rod misaligned from its group step counter demand height, the rod is declared inoperable and the SDM requirement of Specification 3.1.1.1 is satisfied within 1 hour. ITS 3.1.4 ACTION A and B requires, within 1 hour, to verify SDM is within the limits specified in the COLR or to initiate boration to restore SDM to within limits. This changes the CTS by allowing boration to restore SDM. This change has been designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.1.4 ACTION A and B	3.1.3.1 Action a Action d.3	4
3.1.4 L02	CTS 3.1.3.1 ACTION d specifies the requirements for one full length rod misaligned from its group step counter demand height by more than the allowed rod misalignment. CTS 3.1.3.1 ACTION d.3 requires the affected rod to be declared inoperable. ITS 3.1.4 ACTION B specifies requirements for one rod not within alignment limits and does not require that the rod be declared inoperable. This changes the CTS by deleting the requirement to declare a misaligned rod inoperable. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.1.4 ACTION B	3.1.3.1 Action d	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.4 L03	CTS 3.1.3.1 ACTION d.3.a states that with one rod misaligned, reduce the THERMAL POWER level to less than 75% of the RATED THERMAL POWER within one hour. ITS 3.1.4 Required Action B.2.2 requires THERMAL POWER to be reduced to 75% of the RATED THERMAL POWER within two hours. This changes the CTS by changing the Completion Time from one hour to two hours. This change is designated as less restrictive because additional time is allowed to restore parameters to within the LCO limits than was allowed in the CTS.	3.1.4 Required Action B.2.2	3.1.3.1 Action d.3.a	4
3.1.4 L04	CTS 3.1.3.1 ACTION d.3.a states that with one rod misaligned, reduce the high neutron flux setpoint to less than or equal to 85% of RATED THERMAL POWER within the next 4 hours. ITS 3.1.4 Required Action B.2.2 requires THERMAL POWER to be reduced to ≤ 75% RTP but does not require the high neutron flux trip setpoint to be reduced. This changes the CTS by eliminating the Required Action to reduce the high neutron flux trip setpoint. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	None	3.1.3.1 Action d.3.a	4
3.1.4 L05	CTS 4.1.3.1.1 states "…verify the group positions at least once per 4 hours." ITS SR 3.1.4.1 requires verifying individual rod positions are within alignment limits in accordance with the Surveillance Frequency Control Program. This changes the CTS by eliminating the requirements to verify the individual rod position to be within alignment limits every 4 hours when the Rod Position Deviation Monitor is inoperable. This change is designated as less restrictive because Surveillances will be performed less frequently under the ITS than under the CTS.	SR 3.1.4.1	4.1.3.1.1	7

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.4 L06	CTS 4.1.3.4.b requires the rod drop time of full-length rods shall be demonstrated through measurement prior to reactor criticality for specifically affected individual rods following any maintenance on or modification to the control rod drive system which could affect the drop time of those specific rods. ITS 3.1.4 does not contain this testing requirement. This changes the CTS by not explicitly requiring post-maintenance testing on full length rods. This change is designated as less restrictive because Surveillances which are required in the CTS will not be required in the ITS.	None	4.1.3.4.b	5
3.1.4 L07	CTS 4.1.1.1.1.a requires the SDM to be within the limits specified in the COLR within one hour after detection of an inoperable control rod(s) and at least once per 12 hours thereafter while the rod is inoperable. CTS 4.1.1.2.a requires the SDM to be determined within the limits specified in the COLR within one hour after detection of an inoperable control rod(s) and at least once per 12 hours thereafter while the rod is inoperable. These requirements are applicable in MODES 1, 2, 3, 4, and 5. ITS 3.1.4 Required Action A.1.1 requires the verification of SDM to be within limits within 1 hour. This verification is required in MODES 1 and 2 with one or more control rod(s) inoperable. This changes the CTS by not requiring any explicit SDM verifications for inoperable control rod(s) in MODES 3, 4, and 5, other than the normal verifications specified in ITS SR 3.1.1.1 (once every 24 hours). For MODES 1 and 2 operations, this changes the CTS by not requiring the verification of SDM on a once per 12-hour basis for one or more inoperable rod(s). This change is designated as less restrictive because Surveillances which are required in the CTS will not be required in the ITS	3.1.4 Required Action A.1.1	4.1.1.1.1.a 4.1.1.2.a	5

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.4 L08	CTS 3.1.3.1 states, "…within one hour after rod motion." ITS SR 3.1.4.1 Note states "Not required to be performed until 1 hour after associated rod motion." This changes the CTS by allowing verification after 1 hour. This change is designated as less restrictive because Surveillances will be performed less frequently under the ITS than under the CTS.	SR 3.1.4.1 Note	3.1.3.1	7
3.1.4 L09	CTS 4.1.3.2.1 requires determining that each analog rod position indicator is OPERABLE by verifying that the Demand Position Indication System and the Analog Rod Position Indication System agree within the Allowed Rod Misalignment of CTS Specification 3.1.3.1 in accordance with the Surveillance Frequency Control Program (currently every 12 hours). When the Rod Position Deviation Monitor is inoperable the determination frequency is increased to at least once per 4 hours. ITS does not include this increased frequency when the Rod Position Deviation Monitor is inoperable. This changes the CTS by eliminating the increased alignment determination frequency based on OPERABILITY of the Rod Position Deviation Monitor. This change is designated as less restrictive because Surveillances will be performed less frequently under the ITS than under the CTS.	3.1.4	4.1.3.2.1	7
3.1.5 L01	CTS 3.1.3.5 ACTION provides compensatory actions for a maximum of one shutdown rod not fully withdrawn. The actions require within one hour to either fully withdraw the rod or declare the rod to be inoperable and apply ACTION 3.1.3.1. For more than one shutdown rod not fully withdrawn, CTS 3.1.3.5 does not contain a specific requirement; therefore, entry into CTS 3.0.3 is required. ITS 3.1.5 ACTION B provides Required Actions for one or more shutdown banks not within limits. ITS 3.1.5 Required Action B.1 requires either verification that the SDM is within the limits specified in the Core Operating Limits Report (COLR) (Required Action B.1.1) or the	3.1.5 ACTION B	3.1.3.5 Action	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.5 L01 (continued)	initiation of boration to restore SDM to within limits (Required Action B.1.2), both within 1 hour. ITS 3.1.5 Required Action B.2 requires restoration of the shutdown banks to within limits within 2 hours. Additionally, ITS 3.1.5 ACTION C requires if any Required Action and associated Completion Time is not met, the unit must be in MODE 3 within 6 hours. This changes the CTS by allowing more than one shutdown rod to be not fully withdrawn, provides an additional hour to restore the shutdown bank or shutdown rod to within limits, eliminates the requirement to declare the rod inoperable and to take the ACTIONS of Specification 3.1.3.1, and adds the requirement to verify SDM or to initiate boration within one hour. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.			
3.1.5 L02	CTS 4.1.3.5.a requires verification that each shutdown rod is within the insertion limit specified in the COLR within 15 minutes prior to withdrawal of any rods in control banks A, B, C, or D during an approach to reactor criticality. ITS 3.1.5 does not require verification that the shutdown rods are above the insertion limits within 15 minutes prior to control bank withdrawal. This changes the CTS by eliminating the requirement that the shutdown banks be verified to be above the insertion limit within 15 minutes prior to withdrawing control banks A, B, C, and D. This change is designated as less restrictive because a Surveillance which was required in CTS will not be required in the ITS.	None	4.1.3.5.a	5

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.5 L03	CTS 3.1.3.5 ACTION provides compensatory actions for a maximum of one shutdown rod not fully withdrawn. The Actions require within one hour either fully withdraw the rod or declare the rod to be inoperable and apply ACTION 3.1.3.1. For more than one shutdown bank not fully withdrawn, CTS 3.1.3.5 does not contain a specific requirement; therefore, entry into CTS 3.0.3 is required. ITS 3.1.5 ACTION A provides Required Actions for one shutdown bank inserted ≤ 20 steps beyond the insertion limits specified in the COLR. ITS 3.1.5 Required Action A.1 requires verification of all control banks are within the insertion limits specified in the COLR and either verification that the SDM is within the limits specified in the COLR (Required Action A.1.1) or the initiation of boration to restore SDM to within limits (Required Action A.1.2), all three within 1 hour. ITS 3.1.5 Required Action A.3 requires restoration of the shutdown banks to within limits within 24 hours. Additionally, ITS 3.1.5 ACTION C requires that if any Required Action and associated Completion Time is not met, the unit must be in MODE 3 within 6 hours. This changes the CTS by allowing one shutdown bank to be not fully withdrawn, provides an additional 24 hours to restore the shutdown bank or shutdown rod to within limits, eliminates the allowance to declare the rod inoperable and to take the ACTIONS of Specification 3.1.3.1, and adds the requirement to verify SDM or to initiate boration within one hour. It also eliminates the requirement to enter CTS 3. 0.3 if more than one shutdown rod is not fully withdrawn. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.1.5 ACTION A	3.1.3.5 Action	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.5 L04	CTS Surveillance Requirement (SR) 4.1.3.5 requires the shutdown rod bank to be determined fully withdrawn. The ITS requires the shutdown bank to be within the insertion limits specified in the COLR. The ITS is modified by a Note which states "Not required to be performed until 1 hour after the associated rod motion." This changes the CTS by adding the ITS Note, which, allows the SR to be delayed 1 hour after rod motion. This change in designated as less restrictive because a delay of one hour is allowed to perform the SR that is not currently allowed.	SR 3.1.5.1	4.1.3.5	7
3.1.6 L01	CTS 4.1.3.6 requires that during time intervals when the Rod Insertion Limit Monitor is inoperable, the individual rod positions be verified at least once per 4 hours. ITS 3.1.6.2 requires verification that each control bank insertion is within the insertion limits specified in the COLR in accordance with the SFCP. This changes the CTS by eliminating the requirement to verify the control bank insertion to be within limits every 4 hours when the Rod Insertion Limit Monitor is inoperable. This change is designated as less restrictive because a Surveillance which was required in CTS will not be required in the ITS.	SR 3.1.6.2	4.1.3.6	5
3.1.6 L02	CTS 3.1.3.6 does not have an ACTION associated with control bank A, B, or C inserted ≤ 20 steps beyond the insertion, sequence, or overlap limits specified in the COLR. ITS 3.1.5 ACTION A provides Required Actions for one shutdown bank inserted ≤ 20 steps beyond the insertion limits specified in the COLR. ITS 3.1.6 Required Action A.1 requires verification of all control banks are within the insertion limits specified in the COLR and either verification that the SDM is within the limits specified in the COLR (Required Action A.1.1) or the initiation of boration to restore SDM to within limits (Required	3.1.6 ACTION	3.1.3.6 Actions	3

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.6 L02 (continued)	Action A.1.2), all three within 1 hour. ITS 3.1.6 Required Action A.3 requires restoration of the shutdown banks to within limits within 24 hours. Additionally, ITS 3.1.6 ACTION C requires that if any Required Action and associated Completion Time is not met, the unit must be in MODE 3 within 6 hours. This changes the CTS by allowing one control bank to be beyond the insertion, sequence, or overlap limits specified in the COLR for 24 hours to restore the control rod bank to within limits, eliminates the allowance to declare the rod inoperable and to take the ACTIONS of Specification 3.1.3.1, and adds the requirement to verify SDM or to initiate boration within one hour. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.			
3.1.6 L03	CTS Surveillance Requirement (SR) 4.1.1.1.1.b requires control bank withdrawal to be verified within the limits specified in CTS 3.1.3.6 in accordance with the SFCP. ITS SR 3.1.6.2 requires the control bank to be within the insertion limits specified in the COLR. The ITS is modified by a Note which states "Not required to be performed until 1 hour after the associated rod motion." This changes the CTS by adding the ITS Note, which, allows the SR to be delayed 1 hour after rod motion. This change in designated as less restrictive because a delay of one hour is allowed to perform the SR that is not currently allowed.	SR 3.1.6.2	4.1.1.1.1	7

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.7 L01	CTS 3.1.3.2 ACTION a covers the inoperability for a maximum of one analog rod position indicator (RPI) per bank. CTS 3.1.3.2 ACTION b covers the inoperability for a maximum of one demand position indicator per bank. ITS 3.1.7 ACTIONS provide requirements for the inoperability of RPI on a per group basis and demand position indicators on a per bank basis. The change from RPI per bank to RPI per group in one or more groups is discussed in DOC L06. ITS 3.1.7 ACTIONS are modified by a Note that states "Separate Condition entry is allowed for each inoperable RPI and each demand position indicator." ITS 3.1.7 ACTION A covers inoperability for one RPI per group in one or more groups. ITS 3.1.7 ACTION B covers inoperability for more than one RPI per group in one or more groups. ITS 3.1.7 ACTION D covers inoperability for one demand position indicator bank for one or more banks. This changes the CTS by allowing separate Condition entry for each inoperable RPI and each inoperable demand position indicator. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.1.7 ACTIONS	3.1.3.2 Actions a and b	4
3.1.7 L02	CTS 3.1.3.2 ACTION requires that with a maximum of one analog rod position indicator per bank inoperable, restore the inoperable indicator or reduce THERMAL POWER within 8 hours. CTS 3.1.3.2 has no ACTION for more than one analog rod position indicator per bank inoperable. ITS 3.1.7 ACTION B requires more than one rod position indicator in one or more groups inoperable to be restored to OPERABLE status such that a maximum of one rod position indicator per group is inoperable within 24 hours. This changes the CTS by allowing 24 hours to restore inoperable rod position indicators to OPERABLE status such that a maximum of one rod position indicator per group is inoperable.	3.1.7 ACTION B	3.1.3.2 Actions	3

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.7 L02 (continued)	This change is designated as less restrictive because additional time is allowed to restore parameters to within the LCO limits than was allowed in the CTS.			
3.1.7 L03	CTS 3.1.3.2 Action a.2, which allows use of movable incore detectors as an alternative method of verifying rod position, is modified by Footnote ** that states, "Rod position monitoring by Actions A.2.a), a.2.b), and a.2.c) may only be applied to one inoperable rod position indicator per unit and shall only be allowed until an entry into MODE 3." ITS 3.1.7 ACTIONS do not contain this limitation on the use of movable incore detectors as an alternative method of verifying rod position. This changes the CTS by eliminating the requirement limiting the alternate method of verifying rod position to only one inoperable RPI per unit and only until an entry into MODE 3. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.1.7 ACTIONS	3.1.3.2 Action a.2	4
3.1.7 L04	CTS 3.1.3.2 Action a.1 requires, in part, determining the position of the non-indicating rod(s) indirectly by movable incore detectors within one hour after any motion of the non-indicating rod which exceeds 24 steps in one direction since the last determination of rod's position. CTS 3.1.3.2 Action a.2.a requires, in part, determining the position of the non-indicating rod indirectly by movable incore detectors within 1 hour if rod control system parameters indicate unintended movement. ITS 3.1.7 Required Action A.1 requires, in part, verification of the position of the rods with inoperable RPI indirectly by using movable incore detectors within 8 hours after discovery of each unintended rod movement. ITS 3.1.7 Required Action C.1 requires verification of the position of the rods with inoperable RPI indirectly by using movable incore detectors within 8 hours. This changes the CTS	3.1.7 Required ACTION A.1	3.1.3.2 Action a.1	3

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.7 L04 (continued)	by extending the Completion Time to verify the position of the rods with inoperable RPI indirectly by using movable incore detectors. This change is designated as less restrictive because additional time is allowed to perform remedial actions when the LCO is not met than was allowed in the CTS.			
3.1.7 L05	CTS 4.1.3.2.2 requires a CHANNEL CHECK, CHANNEL CALIBRATION, and ANALOG CHANNEL OPERATIONAL TEST for each required analog rod position indicator as specified in Table 4.1-1. ITS 3.1.7 does not contain a CHANNEL CHECK or an ANALOG CHANNEL OPERATIONAL TEST Surveillance Requirement (SR) or Table 4.1-1. ITS SR 3.1.7.1 requires performance of a CHANNEL CALIBRATION for each RPI. CHANNEL CALIBRATION will be performed once prior to criticality after each removal of the reactor head. ITS SR 3.1.7.1 includes a note that the RPI detectors are excluded from CHANNEL CALIBRATION. This changes the CTS by deleting surveillances. This change is designated as a less restrictive because Surveillances, which were required in the CTS, will not be required in the ITS.	SR 3.1.7.1	4.1.3.2.2	5
3.1.7 L06	CTS 3.1.3.2 Action a states, in part, “With a maximum of one analog rod position indicator per bank inoperable...” CTS 3.1.3.2 Action b states, in part, “With a maximum of one demand position indicator per bank inoperable…” ITS 3.1.7 Condition A applies with, “One RPI per group inoperable in one or more groups.” ITS 3.1.7 Condition D applies with, “One or more demand position indicators per bank inoperable in one or more banks.” The CTS is revised to incorporate the ISTS allowance for one rod position indicator (RPI) per group to be inoperable in one or more groups versus one rod per bank and the allowance of multiple demand position indicators to be inoperable in one or more banks. This changes the CTS by allowing more inoperable RPIs and demand position indicators at any given time.	3.1.7 Condition A 3.1.7 Condition D	3.1.3.2 Action a	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.7 L06 (continued)	This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.			
3.1.8 L01	CTS Surveillance Requirement (SR) 4.10.3.2 states "Each Intermediate and Power Range channel shall be subjected to an ANALOG CHANNEL OPERATIONAL TEST within 12 hours prior to initiating PHYSICS TESTS." ITS SR 3.1.8.1 states "Perform a CHANNEL OPERATIONAL TEST…" with Frequency "Prior to initiation of PHYSICS TESTS." This changes the CTS by not requiring 12 hours prior to initiating PHYSICS TESTS. This change is designated as less restrictive because Surveillances may be performed less frequently under the ITS than under the CTS.	SR 3.1.8.1	4.10.3.2	7
Refer to DOC section in ML23151A445	**Section 3.2, Power Distribution Limits**			
3.2.1 L01	CTS 3.2.2 ACTION a states, in part, that when the $F_Q(Z)$ measured value exceeds its limit and THERMAL POWER has been reduced, to reduce the Power Range Neutron Flux – High Trip setpoints at least 1% the $F_Q(Z)$ measured value exceeds the limit within 4 hours. ITS 3.2.1 Required Actions A.2 states to reduce the Power Range Neutron Flux – High trip at least by 1% for each 1% that THERMAL POWER reduced in Required Action A.1 within 72 hours. This changes the CTS by increasing the time allowed to reduce the trip setpoints. This change is designated as less restrictive, because additional time is allowed to lower the Power Range Neutron Flux - High Trip setpoints than was allowed in the CTS.	3.2.1 Required Action A.2	3.2.2 Action a	3

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2.1 L02	CTS 4.2.2.a.1) states that if $F_j(Z)$ exceeds $[F_j(Z)]_s$* as defined in the bases by £ 4%, immediately reduce thermal power one percent for every percent by which $[F_j(Z)]_s$ is exceeded. ITS Required Action B.1 requires the same action with a Completion Time of 15 minutes to reduce THERMAL POWER. This changes the CTS by relaxing the Completion Time from "immediately" to 15 minutes. This change is designated as less restrictive because additional time is allowed to perform an action than was allowed in the CTS.	3.2.1 Required Action B.1	4.2.2.a.1	3
3.2.1 L03	CTS 4.2.2.5 requires an overall measured $F_Q(Z)$ to be obtained from a power distribution map and increased by 3% to account for manufacturing tolerances and further increased by 5% to account for measurement uncertainty when $F_Q(Z)$ is measured for reasons other than meeting the requirements of Specifications 4.2.2.1, 4.2.2.2, 4.2.2.3 or 4.2.2.4. ITS 3.2.1 does not require an explicit requirement to obtained from a power distribution map and account for manufacturing tolerances and measurement uncertainty when $F_Q(Z)$ is measured for reasons other than TS requirements. This changes the CTS by eliminating an explicit surveillance requirement. This change is designated as less restrictive because a Surveillance that was required in the CTS will not be performed in the ITS.	SR 3.0.1	4.2.2.5	5
3.2.2 L01	CTS 3.2.3 ACTION a.2 states, in part, that when $F^N_{\Delta H}$ exceeds its limit, reduce the Power Range Neutron Flux – High Trip setpoints to less than or equal to 55% of RATED THERMAL POWER within the next 4 hours. ITS 3.2.2 Required Actions A.1.2.2 states with $F^N_{\Delta H}$ not within limit, reduce the Power Range Neutron Flux – High trip setpoints to ≤ 55% RTP within 72 hours. This changes the CTS by increasing the time allowed to reduce the trip setpoints.	3.2.2 Required Actions A.1.2.2	3.2.3 Action a.2	3

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2.2 L01 (continued)	This change is designated as less restrictive, because additional time is allowed to lower the Power Range Neutron Flux - High Trip setpoints than was allowed in the CTS.			
3.2.2 L02	CTS 3.2.3 ACTION b states, "Verify through incore flux mapping that $F^N_{\Delta H}$ has been restored to within the above limit, or reduced THERMAL POWER to less than 5% of RATED THERMAL POWER within the next two hours." ITS 3.2.2 ACTION B states, "Required Action and associated Completion Time not met." Required Action B.1 states, "Be in MODE 2" within a Completion Time of "6 hours." This changes the CTS by increasing the time allowed to exit the MODE of Applicability when the Required Actions or associated Completion Times are not met. This change is designated as less restrictive because additional time is allowed to exit the LCO than was allowed in the CTS.	3.2.2 ACTION B	3.2.3 Action b	3
3.2.2 L03	CTS 3.2.3 ACTION a.1 states, in part, that when $F^N_{\Delta H}$ exceeds its limit, restore $F^N_{\Delta H}$ to within the limits, or Reduce THERMAL POWER to less than 50% of RATED THERMAL Power within 2 hours. ITS 3.2.2 Required Actions A.1 states that with $F^N_{\Delta H}$ not within limit, restore $F^N_{\Delta H}$ to within limits, or Reduce THERMAL POWER to < 50% RTP within 4 hours. This changes the CTS by increasing the time allowed to restore limits or reduce power. This change is designated as less restrictive because additional time is allowed to restore parameters to within the LCO limits than was allowed in the CTS.	3.2.2 Required Actions A.1	3.2.3 Action a.1	3

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2.3 L01	CTS 3.2.1 ACTION a.1 and ACTION b.1 requires with the AXIAL FLUX DIFFERENCE (AFD) outside of the limits, to restore the indicated AFD to within the limits within 15 minutes. ITS LCO 3.2.3 does not include a Required Action to restore the indicated AFD to within the limits within 15 minutes. This changes the CTS by not including a specific requirement to restore the AFD to within limits. This change is designated as less restrictive, because additional time Completion Time is provided that was no provided in the CTS	LCO 3.2.3	3.2.1 Action a.1 Action b.1	4
3.2.3 L02	CTS 3.2.1 ACTION a.2 states that with the indicated AFD outside of the limits specified in the COLR, reduce the Power Range Neutron Flux-High Trip setpoints to less than or equal to 55 percent of RATED THERMAL POWER within the next 4 hours. ITS LCO 3.2.3 ACTION A only requires THERMAL POWER to be reduced to less than 50% RTP. This changes the CTS by eliminating the requirement to reduce the Power Range Neutron Flux – High trip setpoints to ≤ 55% of RTP within the next 4 hours. This change is designated as less restrictive because less stringent Required Actions are being applied in ITS then were applied in the CTS	LCO 3.2.3	3.2.1 Action a.2	4
3.2.3 L03	CTS 4.2.1.1.a requires the monitoring of the indicated AFD for each OPERABLE excore channel in accordance with the Surveillance Frequency Control Program when the alarm used to monitor the AFD is OPERABLE. CTS 4.2.1.1.b requires the monitoring and logging the indicated AFD for each OPERABLE excore channel at least once per hour for the first 24 hours and at least once per 30 minutes thereafter, when the alarm used to monitor the AFD is inoperable. The logged values of the indicated AFD shall be assumed to exist during the interval preceding each logging. This changes the CTS by eliminating all AFD Surveillance Frequencies based on the OPERABILITY of the AFD Monitor Alarm.	3.2.3	4.2.1.1.a 4.2.1.1.b	7

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2.3 L03 (continued)	This change is designated as less restrictive because Surveillances will be performed less frequently under the ITS than under the CTS.			
3.2.4 L01	CTS 3.2.4 ACTIONS a.1, b.1, and c.1 require calculating the QPTR at least once per hour. ITS 3.2.4 ACTION A (Required Action A.2 and associated Completion Time) require, in part, that when the QPTR is not within limit to determine QPTR once per 12 hours. This changes the CTS by requiring the determination of QPTR to be done once per 12 hours instead of once per hour. This change is designated as less restrictive because less stringent Completion Times are being applied in the ITS than were applied in the CTS.	3.2.4 ACTION A	3.2.4 Action a.1 Action b.1 Action c.1	3
3.2.4 L02	CTS 3.2.4 ACTION a.2.b) requires that when QPTR is in excess of 1.00 but less than or equal to 1.09, to reduce THERMAL POWER at least 3% from RTP for each 1% of indicated QPTR in excess of 1.00 and similarly reduce the Power Range Neutron Flux-High Trip Setpoints within the next 4 hours. ITS 3.2.4 Required Action A.1 includes the requirement to reduce the THERMAL POWER but does not include a requirement to reduce the Power Range Neutron Flux-High Trip Setpoints. This changes the CTS by eliminating the requirement to reduce the Power Range Neutron Flux-High Trip Setpoints. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.2.4 Required Action A.1	3.2.4 Action a.2.b	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2.4 L03	CTS 3.2.4 ACTION a.3 states “Verify that the QUADRANT POWER TILT RATIO is within its limit within 24 hours after exceeding the limit or reduce THERMAL POWER to less than 50% of RATED THERMAL POWER within the next 2 hours and reduce the Power Range Neutron Flux-High Trip setpoints to less than or equal to 55% of RATED THERMAL POWER within the next 4 hours.” CTS 3.2.4 ACTION b.3 and b.4 contain the same compensatory actions as CTS ACTION a.3 but requires the QPTR to be within limits within 2 hours. CTS 3.2.4 ACTIONS a.4, b.4, and c.3 state “Identify and correct the cause of the out of limit condition prior to increasing THERMAL POWER; subsequent POWER OPERATION above 50% of RATED THERMAL POWER may proceed provided that the QUADRANT POWER TILT RATIO is verified within its limit at least once per hour for 12 hours or until verified acceptable at 95% or greater RATED THERMAL POWER.” ITS 3.2.4 Required Action A.3 requires performance of SR 3.2.1.1, SR 3.2.1.2, SR 3.2.2.1 within 24 hours after achieving equilibrium conditions from a THERMAL POWER reduction per Required Action A.1 and once per 7 days thereafter. ITS 3.2.4 Required Action A.4 requires reevaluation of the safety analyses and confirmation that the results remain valid for duration of operation under this condition prior to increasing THERMAL POWER above the limit of Required Action A.1. ITS 3.2.4 Required Action A.5 requires normalization of excore detectors to restore QPTR to within limit prior to increasing THERMAL POWER above the limit of Required Action A.1. ITS 3.2.4 Required Action A.6 requires performance of SR 3.2.1.1, SR 3.2.1.2, SR 3.2.2.1, in accordance with the COLR, within 24 hours after achieving equilibrium conditions at RTP not to exceed 48 hours after increasing THERMAL POWER above the limit of Required Action A.1. Additionally, ITS 3.2.4 Required Action A.5 contains two Notes and ITS 3.2.4 Required Action A.6 contains one Note. ITS 3.2.4 Required Action A.5 Note 1 states “Perform Required Action A.5 only after Required Action A.4 is completed.” ITS 3.2.4 Required Action A.5 Note 2 states “Required Action A.6 shall be	3.2.4 Required Action A	3.2.4 Action a Action b Action c	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2.4 L03 (continued)	completed whenever Required Action A.5 is performed." ITS 3.2.4 Required Action A.6 Note states "Perform Required Action A.6 only after Required Action A.5 is completed." Furthermore, ITS 3.2.4 ACTION B states that with a Required Action and associated Completion Time (of Condition A) not met, reduce THERMAL POWER to ≤ 50% RTP within 4 hours. This changes the CTS by eliminating requirements to be ≤ 50% RTP within a specified time of exceeding the LCO and substituting compensatory measures in ITS 3.2.4 ACTION A, which if not met, results in a reduction in power per ITS 3.2.4 ACTION B. In addition, the requirements to reduce the Power Range Neutron Flux – High trip setpoints within 4 hours after reducing power to ≤ 50% is eliminated. This change is designated as less restrictive because less stringent Required Actions are being applied in ITS than applied in CTS.			
3.2.4 L04	CTS 3.2.4 ACTION b.2, applies when QPTR is greater than 1.09 due to misalignment of either a shutdown or control rod, requires a THERMAL POWER reduction from RTP for each 1% of indicated QPTR in excess of 1.00 within 30 minutes. ITS 3.2.4 Required Action A.1 requires a THERMAL POWER reduction of 3% from RTP for each 1% QPTR exceeds 1.00 within 2 hours. This changes the CTS by allowing 2 hours to perform the required power reduction. This change is designated as less restrictive because additional time is allowed to decrease power than was allowed in CTS.	3.2.4 Required Action A.1	3.2.4 Action b.2	3
3.2.4 L05	CTS 4.2.4.1.a states, in part, that the QPTR shall be determined to be within the limit by calculating the ratio in accordance with the Surveillance Frequency Control Program (SFCP). ITS SR 3.2.4.1 requires the same determination but includes two Notes. ITS SR 3.2.4.1 Note 1 states when the input from one Power Range Neutron Flux channel is inoperable, the remaining three power range channels can be used for calculating QPTR as long as THERMAL	SR 3.2.4.1 Note 1 Note 2	4.2.4.1.a	6

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2.4 L05 (continued)	POWER is less than or equal to 75% RTP. ITS SR 3.2.4.1 Note 2 states that SR 3.2.4.2 may be performed in lieu of this Surveillance. This changes the CTS by allowing use of three Power Range Neutron Flux channels for calculating the QPTR and by allowing the movable incore detectors to be used to determine QPTR instead of the excore detectors. This change is designated as less restrictive because less stringent SRs are being applied in ITS than in CTS.			
3.2.4 L06	CTS 4.2.4.1.a states that the QPTR shall be determined to be within the limit by calculating the ratio in accordance with the SFCP when the Power Range Upper Detector High Flux Deviation and Power Range Lower Detector High Flux Deviation Alarms are OPERABLE. CTS 4.2.4.1.b states that the QPTR shall be determined to be within the limit by calculating the ratio in accordance with the SFCP during steady state operation when the alarm is inoperable. ITS SR 3.2.4.1 requires verification that the QPTR is within limits in accordance with the SFCP. This changes the CTS by eliminating the requirement to verify the QPTR more frequently when the QPTR alarm is inoperable. This change is designated as less restrictive because Surveillances will be performed less frequently under ITS than under CTS.	SR 3.2.4.1	4.2.4.1.a 4.2.4.1.b	7
3.2.4 L07	CTS 4.2.4.2 states, in part, that the QPTR shall be determined to be within the limit when above 75 percent of RTP with one Power Range Channel inoperable by using the movable incore detectors, or by incore thermocouple map. ITS SR 3.2.4.2 requires determination of the QPTR by use of the movable incore detectors. Additionally, ITS SR 3.2.4.2 contains a Note which states "Not required to be performed until 12 hours after input from one or more Power Range Neutron Flux channels are inoperable with THERMAL POWER > 75% RTP." This changes the CTS by not requiring the Surveillance to be performed	SR 3.2.4.2	4.2.4.2	7

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2.4 L07 (continued)	until 12 hours after input from one or more Power Range Neutron Flux channels are inoperable. This change is designated as less restrictive because Surveillances will be performed less frequently under ITS than under CTS.			
3.2.4 L08	CTS 4.2.4.2, in part, permits verification of QPTR to be within limits with one Power Range Neutron Flux channel inoperable by use of the incore thermocouple map and verifying it is consistent with the indicated QPTR. This option is retained in ITS SR 3.2.4.3 and associated Note 1. Note 2 is added to ITS SR 3.2.4.3 consistent with the allowance provided in ISTS SR 3.2.4.2, stating that the SR is not required to be performed until 12 hours after Input from one Power Range Neutron Flux channel is inoperable with THERMAL POWER > 75% RATED THERMAL POWER (RTP). This changes the CTS by not requiring the Surveillance to be performed until 12 hours after input from one or more Power Range Neutron Flux channels are inoperable. This change is designated as less restrictive because Surveillances will be performed less frequently under ITS than under CTS.	SR 3.2.4.3	4.2.4.2	7

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
Refer to DOC section in ML23151A446	**Section 3.3, Instrumentation**			
3.3.1 L01	CTS 3.3.1, ACTION 4, requires suspension of all operations involving positive reactivity changes when the number of OPERABLE Source Range Neutron Flux channels for the Startup Monitor is one less than the minimum channels OPERABLE. ITS 3.3.1 ACTION H requires the same Actions under similar circumstances but allows limited plant cooldown or boron dilution provided the change is accounted for in the calculated SDM. This changes the CTS by allowing limited addition of positive reactivity as long as it is accounted for in the SDM calculation. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.3.1 ACTIONS H and I	3.3.1 Action 4	4
3.3.1 L02	CTS 3.3.1, ACTION 2.c, requires THERMAL POWER to be restricted to less than or equal to 75% of RTP and that the Power Range Neutron Flux Trip Setpoint be reduced to less than 85% of RTP. ITS 3.3.1, Required Action D.1.1, does not require the Power Range Neutron Flux Trip Setpoint be reduced. This changes the CTS by eliminating the Required Action to reduce the Neutron Flux Setpoint. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.3.1 Required Action D.1.1	3.3.1, Action 2.c	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.1 L03	CTS 3.3.1, ACTION 9, requires the reactor trip system breakers to be opened if the channel cannot be restored within a certain period of time. ITS 3.3.1, ACTION K, requires the action to fully insert all rods and place the rod control system in a condition incapable of rod withdrawal. This changes the CTS by allowing flexibility on how to make the control rods incapable of rod withdrawal besides opening the RTSB. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.3.1 ACTION K	3.3.1, Action 9	4
3.3.1 L04	CTS 3.3.1, ACTION 3, states that when the number of intermediate range neutron flux channels is one less than the minimum, and THERMAL POWER is above the P-6 setpoint but below P-10 setpoint, the inoperable channel is required to be restored prior to increasing THERMAL POWER above the P-10 setpoint. ITS 3.3.1, ACTION F, in the same scenario requires THERMAL POWER to be reduced to below P-6 or increase THERMAL POWER to greater than P-10. This changes the CTS, by requiring THERMAL POWER to be either decreased or increased to enter a power level where neutron flux monitoring is available. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.3.1 ACTION F	3.3.1, Action 3	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.1 L05	CTS 3.3.1, Table 3.3-1, Function 2.b, Power Range, Neutron Flux Low Setpoint, requires that when one channel is inoperable, CTS Table 3.3-1, ACTION 2, is applicable, which requires the inoperable channel to be placed in trip within 6 hours and either THERMAL POWER restricted to less than or equal to 75% of RATED THERMAL POWER and the Power Range Neutron Flux Trip Setpoint is reduced to less than or equal to 85% RTP within 4 hours, or the QPTR is monitored per Specification 4.2.4.2. ITS 3.3.1, Action E, requires that when one channel of the Power Range, Neutron Flux Low is inoperable, the inoperable channel is to be placed in trip within 6 hours. This changes the CTS by eliminating all required actions except the one to place the channel in trip. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.3.1 ACTION E	3.3.1, Action 2	4
3.3.1 L06	CTS 3.3.1, Table 3.3-1, Functional Unit 4.b, “Source Range, Neutron Flux – Shutdown,” requires a minimum of two channels to be OPERABLE in MODES 3, 4, and 5, and no channels are required to initiate a reactor trip. CTS 3.3.1, Table 3.3-1, Functional Unit 4.c, “Source Range, Neutron Flux – Shutdown,” also requires a minimum of two channels to be OPERABLE in MODES 3, 4, and 5 but requires one channel to trip, and the * footnote modifies the Applicability to “when the Reactor Trip System breakers are in the closed position and the Control Rod drive System is capable of rod withdrawal.” ITS 3.3.1 includes the equivalent of CTS Table 3.31, Functional Unit 4.c (ITS Table 3.3.1-1, Function 4). However, ITS 3.3.1 does not include an equivalent requirement for CTS Table 3.3-1, Functional Unit 4.b. This changes the CTS by eliminating the requirement for OPERABLE source range neutron flux monitors to be OPERABLE in MODES 3, 4, and 5 when the RTSBs are open, and the Control Rod Drive System is not capable of rod withdrawal.	None	Table 3.3-1 Functional Unit 4.b	~~1~~

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.1 L06 (continued)	This change is designated as less restrictive because less stringent LCO requirements are being applied in the ITS than were applied in the CTS.			
3.3.2 L01	CTS Table 3.3-3, Functional Units 4 (Steam Line Isolation), 4.a. (Manual Initiation), 4.b. (Automatic Actuation Logic and Actuation Relays), 4.c. (Containment Pressure – High-High coincident with Containment Pressure -High), and 4.d. (Steam Line Flow-High coincident with Steam Generator Pressure-Low), are required to be OPERABLE in MODES 1, 2, and 3. ITS Table 3.3.2-1, Function 4 (Steam Line Isolation), 4.a (Manual Initiation), 4.b (Automatic Actuation Logic and Actuation Relays), 4.c (Containment Pressure – High-High coincident with Containment Pressure -High), 4.d (Steam Line Flow-High coincident with Steam Generator Pressure-Low), include a Footnote for MODES 2 and 3, Footnote (j). Footnote (j) states, “Except when all MSIVs are closed and deactivated.” This changes the CTS by making the Specification for these Functions not applicable in MODES 2 and 3 when all MSIVs are closed and deactivated. This change is designated as less restrictive because the LCO requirements are applicable in fewer operating conditions than in the CTS.	Table 3.3.2-1 Footnote (j)	Table 3.3-3	2
3.3.2 L02	CTS Table 3.3-2 requires Functional Unit 5 (Feedwater Isolation) Functions 5.a (Automatic Actuation Logic and Actuation Relays) and 5.c (Steam Generator Water Level – High-High) to be OPERABLE in MODES 1, 2, and 3. ITS Table 3.3.2-1 requires the same Functions (ITS Table 3.3.2-1 Functions 5.a and 5.b) to be OPERABLE in MODE 1, and in MODES 2 and 3 except when all Main Feedwater Isolation Valves (MFIVs), Main Feedwater Regulating Valves (MFRVs), and MFRV bypass valves are closed or isolated by a closed manual valve, Footnote (k). This changes the CTS by not requiring the instrumentation to be OPERABLE when all MFIVs, MFRVs, and	Table 3.3.2-1 Footnote (k)	Table 3.3-2	2

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.2 L02 (continued)	MFRV bypass valves are closed and deactivated, or isolated by a closed manual valve. This change is designated as less restrictive because the LCO requirements are applicable in fewer operating conditions than in the CTS.			
3.3.2 L03	CTS Table 3.3-2 Action 14; which applies when Functional Unit 1.b (Safety Injection Automatic Actuation Logic and Actuation Relays), 2.a (Containment Spray Automatic Actuation Logic and Actuation Relays), 3.a.2) (Containment Isolation Phase “A” Automatic Actuation Logic and Actuation Relays), or 3.b.2) (Containment Isolation Phase “B” Automatic Actuation Logic and Actuation Relays) train is inoperable; Action 20, which applies when a Functional Unit 4.b (Steam Line Isolation Automatic Actuation Logic and Actuation Relays), or 6.a (Auxiliary Feedwater Automatic Actuation Logic and Actuation Relays) train is inoperable; and Action 22, which applies when a Functional Unit 5.a Feedwater Isolation Actuation Logic and Actuation Relays) train is inoperable, do not provide any time to restore the inoperable train. ITS 3.3.2 Required Action C.1 and D.1 will allow 6 hours to restore an inoperable Function 1.b, 2.a, 3.a.(3), 3.b.(2), 4.b, 5.a, or 6.a train to OPERABLE status prior to requiring a unit shutdown. This changes the CTS by allowing 6 hours to restore the affected Automatic Actuation Logic and Actuation Relays train to OPERABLE status prior to commencing a shutdown. In addition, with respect to CTS Table 3.3-2 Action 14, the time to be in MODE 3 (HOT STANDBY) is reduced from 12 hours to 6 hours. This change is designated as less restrictive because the LCO requirements are applicable in fewer operating conditions than in the CTS.	3.3.2 Required Action C.1 and D.1	Table 3.3-2 Action 14	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.2 L04	CTS 3.3.2, Table 3.3-2, Actions 14, 17, and 27 identify degraded conditions of the ESFAS instrumentation for the manual initiation (Functional Units 1.a, Safety Injection, 3.a.(1), Containment Isolation Phase A, 3.b.(1), Containment Isolation Phase B), and the automatic action logic and actuation relay (Functional Units 1.b, Safety Injection, 2.a, Containment Spray, 3.a.(2), Containment Isolation Phase A, and 3.b.(2), Containment Isolation Phase B) Functions required to be OPERABLE in MODES 1, 2, 3, and 4. If the degraded condition is not resolved within a prescribed amount of time CTS 3.3.2, Table 3.3-2, Actions 14, 17, and 27, provide actions to shut down the unit to MODE 5 (cold shutdown). ITS 3.3.2 Action L states that if the Required Action and associated Completion Time of Condition B (Functional Units 1.a, Safety Injection Manual Initiation, 3.a.(1), Containment Isolation Phase A Manual Initiation), or Condition F (Functional Unit 3.b.(1) Containment Isolation Phase B Manual Initiation) are not met to be in MODE 3 in 6 hours and MODE 4 in 12 hours, and is modified by a Note stating that LCO 3.0.4.a is not applicable when entering MODE 4. Condition C (Functional Units 1.b, Safety Injection Automatic Actuation Logic and Actuation Relays; 2.a, Containment Spray Automatic Actuation Logic and Actuation Relays; 3.a.(2), Containment Isolation Phase A Automatic Actuation Logic and Actuation Relays; 3.b.(2), Containment Isolation Phase B Automatic Actuation Logic and Actuation Relays) are not met to be in MODE 3 in 12 hours and MODE 4 in 18 hours, and is modified by a Note stating that LCO 3.0.4.a is not applicable when entering MODE 4. This changes the CTS by allowing a Required Action end state of hot shutdown (Mode 4) rather than an end state of cold shutdown (Mode 5) while allowing 6 hours to transition from MODE 3 to MODE 4. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.3.2 Action L	3.3.2 Table 3.3-2 Actions 14, 17, and 27	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.2 L05	CTS Table 3.3-2 Action 15 states, in part, that with the number of OPERABLE channels one less than the total number of channels, operations may proceed "until performance of the next required ANALOG CHANNEL OPERATIONAL TEST or TRIP ACTUATING DEVICE OPERATIONAL TEST." Similarly, CTS Table 3.3-2 Action 26 states, in part, that with one channel inoperable, operation may proceed "until performance of the next required ANALOG CHANNEL OPERATIONAL TEST or TRIP ACTUATING DEVICE OPERATIONAL TEST." These CTS Actions applies to CTS Table 3.3-2 Functional Units 1.c through 1.f, 2.b, 3.b(3), 4.c, 4.d, 5.c, and 6.b. ITS 3.3.2 ACTION E is the applicable ACTION for Functional Units 1.c through 1.g, 2.b, 4.d (in part), and 6.b while ITS 3.3.2 ACTION I is the applicable ACTION for Functional Units 3.b(3), 4.c, 4.d (in part) when one channel is inoperable, and does not include the restoration time limit of "until performance of the next required ANALOG CHANNEL OPERATIONAL TEST or TRIP ACTUATING DEVICE OPERATIONAL TEST." This changes the CTS by allowing operation with an inoperable channel for an unlimited amount of time provided the inoperable channel is in the tripped condition. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.3.2 ACTIONS E and I	Table 3.3-2 Actions 15 and 26	4
3.3.2 L06	CTS Table 3.3-2 Actions 20 and 22 do not provide any time to restore the inoperable train. CTS Table 3.3-2 Action 20 applies when Functional Unit 4.b (Steam Line Isolation Automatic Actuation Logic and Actuation Relays) or 6.a (Auxiliary Feedwater Automatic Actuation Logic and Actuation Relays) train is inoperable. CTS Table 3.3-2 Action 22 applies when Functional Unit 5.a (Feedwater Isolation Automatic Actuation Logic and Actuation Relays) train is inoperable. ITS 3.3.2 Required Action D.1 will allow 6 hours to restore an inoperable Function 4.b, 5.a or 6.a train to OPERABLE status prior to requiring a unit shutdown. This changes the CTS by allowing 6	3.3.2 Required Action D.1	Table 3.3-2 Actions 20 and 22	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.2 L06 (continued)	hours to restore the affected train to OPERABLE status prior to starting a shutdown. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.			
3.3.2 L07	CTS Table 4.3-2 Note (5) is associated with the performance of a COT for the Pressurizer Pressure – Low, High Differential Pressure Between the Steam Line Header and any SG, and Steam Line Flow High functions of the ESFAS (CTS Table 4.3-2 Functional Units d, e, and f, respectively). Note (5) states, “Test of alarm function not required when alarm locked in.” ITS 3.3.2 does not contain reference to an alarm function or an exception to the alarm function. This changes the CTS by eliminating CTS Table 4.3-2 Note (5) and, subsequently, the associated reference to the alarm function. This change is designated as less restrictive because less stringent SRs are being applied in the ITS than were applied in the CTS.	None	Table 4.3-2 Note (5)	6
3.3.2 L08	CTS Table 4.3-2 Note (2) is associated with the AFW function of the ESFAS. Note (2) states, “Auxiliary feedwater manual initiation is included in Specification 3.7.1.2.” ITS 3.3.2 does not reference a manual initiation of AFW. This changes the CTS by eliminating CTS Table 4.3-2 Note (2) and, subsequently, the associated reference to the AFW manual initiation function. This change is designated as less restrictive because less stringent SRs are being applied in the ITS than were applied in the CTS.	None	Table 4.3-2 Note (2)	6
3.3.3 L01	CTS Table 3.3-5 Instrument 22 “Containment Isolation Valve Position Indication” requires the OPERABILITY of one position indication channel per isolation valve. ITS requires the OPERABILITY of containment isolation valve position indication based on the monitoring of penetration flow paths instead of the individual isolation valve	Table 3.3.3-1 Function 9 ACTIONS A, B, C, E	Table 3.3-5 Instrument 22 Action 39	1

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.3 L01 (continued)	position. ITS Table 3.3.3-1, Function 9, "Penetration Flow Path Containment Isolation Valve Position" requires the OPERABILITY of 2 channels per penetration flow path. This requirement is modified by two footnotes, footnotes (a) and (b). Footnote (a) does not require position indication for isolation valves whose penetration is isolated by at least one closed and deactivated automatic valve, closed manual valve, blind flange or check valve with flow through the valve secured. Footnote (b) requires only one position indication channel per penetration flow path with one installed channel located in the control room. The ITS LCO requires one channel of valve position indication in the control room to be OPERABLE for each active containment isolation valve (CIV) in a containment penetration flow path, i.e., two total channels of CIV position indication for a penetration flow path with two active valves. With the inoperability of one isolation valve position indication CTS Table 3.3-5, Action 39, requires verification of valve position by an alternate means within 2 hours and restoration of the inoperable valve position indication within 7 days or comply with the provisions of Specification 3.6.4 for an inoperable containment isolation valve. ITS requires that with one channel of valve position indication inoperable for a given penetration flow path that the inoperable channel be restored to OPERABLE status within 30 days or immediately initiate action in accordance with Specification 5.6.4 (report submittal) and, with two channels inoperable within a given penetration flow path, to restore one channel to OPERABLE status within 7 days or be in MODE 3 in 6 hours and in MODE 4 within 12 hours. This changes the CTS requirement from monitoring individual containment isolation valve position indication OPERABILITY to a function that monitors containment penetration flow path isolation capability taking facility design and redundant valves or barriers into			

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.3 L01 (continued)	consideration. It also changes the ACTIONS required for inoperability of the valve position indications. This change is designated as less restrictive because the indication requirements per valve have been relaxed and because additional time is allowed to restore the required indication channels to OPERABLE status than is allowed in the CTS.			
3.3.3 L02	CTS Table 3.3-5, Action 34, requires, in part, initiating the preplanned alternate method of monitoring the appropriate parameter(s), within 72 hours when the number of OPERABLE Containment High Range Area Radiation channels are less than required by the Minimum Channels OPERABLE requirements. ITS 3.3.3 ACTIONS do not require this action. This changes the CTS by deleting an action requirement. his change is designated as less restrictive because a CTS action requirement is not included in the ITS.	None	Table 3.3-5 Action 34	4
3.3.3 L03	CTS Table 3.3-5, Action 38, requires restoring one of the inoperable channels to OPERABLE status within 7 days. If repairs are not feasible without shutting down, Item 3 of Action 38 requires the restoration of at least one channel to OPERABLE status at the next scheduled refueling. ITS 3.3.3 ACTIONS do not explicitly require restoring the channel to OPERABLE status at the next scheduled refueling. This changes the CTS by deleting an action requirement. This change is designated as less restrictive because a CTS action requirement is not included in the ITS.	3.3.3 ACTION C	Table 3.3-5 Action 38	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.3 L04	CTS 4.3.3.3 and Table 4.3-4, Instrument 17 (Neutron Flux, Backup NIS (Wide Range)), require, in part, a CHANNEL CALIBRATION on a Frequency in accordance with the Surveillance Frequency Control Program (SFCP). ITS SR 3.3.3.2 also requires a CHANNEL CALIBRATION but is modified by a Note stating, "Neutron detectors are excluded from CHANNEL CALIBRATION." This changes the CTS by including an exception to the channel calibration requirement for neutron detectors. This change is designated as less restrictive because less stringent Surveillance Requirements are being applied in the ITS than were applied in the CTS.	SR 3.3.3.2 Note	4.3.3.3 Table 4.3-4 Instrument 17	6
3.3.4 L01	CTS 3.3.2, Table 3.3-2, Actions 24B, for the control room air intake radiation levels identify degraded conditions. If the degraded condition is not resolved within a prescribed amount of time CTS 3.3.2, Table 3.3-2, Actions 24B provides actions to shut down the unit to MODE 5 (cold shutdown). ITS 3.3.4 Action C states that if the Required Action and associated Completion Time of Condition A are not met, the unit must be in MODE 3 in 6 hours and MODE 4 in 12 hours and is modified by a Note stating that LCO 3.0.4.a is not applicable when entering MODE 4. This changes the CTS by allowing a Required Action end state of hot shutdown (Mode 4) rather than an end state of cold shutdown (Mode 5). This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.3.4 Action C	3.3.2 Table 3.3-2 Actions 24B	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.4 L02	CTS Table 3.3-2, "Engineered Safety Features Actuation System Instrumentation," Functional Unit 9, "Control Room Ventilation Isolation," includes automatic isolation initiation received from a Safety Injection signal, Containment Isolation Manual Phase A or Manual Phase B signal, or the Control Room Air Intake Radiation monitors. Part a of Functional Unit 9 also requires OPERABILITY of the associated "Automatic Actuation Logic and Actuation Relays." This is consistent with the ISTS. However, in the context of ESFAS instrumentation, the Automatic Actuation Logic and Actuation Relays function is associated with the 4-channel logic and actuation paths (including the matrix ladders) necessary to obtain a 2-out-of-4 or 2-out-of-3 actuation of the respective function. The two Control Room Air Intake Radiation monitors do not require this logic. Therefore, Part a of Functional Unit 9 is deleted. This changes the CTS by not including separate OPERABILITY requirements for the Control Room Ventilation Isolation Automatic Actuation Logic and Actuation Relays. This change is designated as less restrictive because less stringent LCO requirements are being applied in the ITS than were applied in the CTS.	None	Table 3.3-2	1
3.3.5 L01	CTS Table 3.3-2 Action 18 provides requirements for when one Loss of Voltage, Undervoltage, or Degraded Voltage channel is inoperable. With more than one channel of these Functional Units inoperable, the shutdown requirements of CTS 3.0.3 would apply because the applicable CTS Table 3.3-2 Actions do not address this condition. ITS 3.3.5 ACTION B requires, with one or more Functions with two or more channels inoperable, restoration of all but one channel per bus or train to OPERABLE status in 1 hour. This changes the CTS to allow more than one channel per Functional Unit of the Loss of Voltage, Undervoltage, and Degraded Voltage Functions to be inoperable.	3.3.5 ACTION B	Table 3.3-2 Action 18	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.5 L01 (continued)	This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.			
3.3.5 L02	CTS Table 3.3-2 Action 18 requires, with the number of OPERABLE channels one less than the total number of channels, that the inoperable channel be placed in trip within 6 hours. If this action is not accomplished, the shutdown requirements of CTS 3.0.3 would apply. ITS 3.3.5 Required Action C.1 states that when the Required Action and associated Completion Time are not met, that the applicable Condition(s) and Required Action(s) for the associated EDG made inoperable by LOP EDG start instrumentation be immediately entered. This changes the CTS by allowing the associated EDG to be declared inoperable instead of entering CTS 3.0.3 and shutting down the unit. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.3.5 Required Action C.1	Table 3.3-2 Action 18	4
3.3.6 L01	CTS 3.3.3.1 Table 3.3-4 ACTION 27 Part 1 requires that grab samples of the containment atmosphere be obtained and analyzed once per 24 hours when both the gaseous and particulate containment radiation monitors are inoperable in MODE 5 or 6. Part 2 of this Action requires the containment atmosphere to be monitored via area radiation monitors. If these Actions are not met, further Action is taken to isolate any open containment penetrations. ITS 3.3.6 is not Applicable in MODE 5 or 6 and does not contain Actions for MODE 5 or 6 (absent the movement of recently irradiated fuel within the containment building). This changes the CTS by not retaining these Actions in the ITS.	None	Table 3.3-4 Action 27	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.6 L01 (continued)	This change is consistent with the ISTS. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.			
3.3.6 L02	CTS 3.9.13 Applicability states "During movement of irradiated fuel within containment." ITS 3.9.4 Applicability states "During movement of recently irradiated fuel assemblies within containment." This changes the CTS by modifying the Applicability to when "recently" irradiated fuel assemblies are being moved versus all irradiated fuel assemblies. This change is designated as less restrictive because the LCO requirements are applicable in fewer operating conditions than in the ITS.	Table 3.3.6-1 Note (a)	3.9.13 Applicability	2
3.3.6 L03	CTS 3.9.13, "Radiation Monitoring," ACTION requires with one or both radiation monitors inoperable, operation may continue provided the containment ventilation isolation valves are maintained closed. CTS Table 3.3-2 and CTS Table 3.3-4 both require only one radioactivity monitor to be OPERABLE to meet the Containment Ventilation Isolation System function. The Required Actions of ITS 3.3.6 effectively govern conditions where both of the radiation monitors are inoperable; no action is required when only one of the radiation monitors is inoperable. Therefore, the ACTION of CTS 3.9.13 is modified to remove the reference to one of the radiation monitors being inoperable. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.3.6 Required Actions	3.9.13 Action a	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.6 L04	CTS 3.3.3.1 requires radiation monitoring instrumentation channels shown in Table 3.3-4 to be OPERABLE with the Alarm/Trip Setpoints within the specified limits. With the Alarm/Trip Setpoint value exceeded, the Trip Setpoint must be adjusted to within the limit within 4 hours or the channel is declared inoperable. The CTS Table 3.3-4 Trip Setpoint is the same as that listed in Trip Setpoint column of CTS 3.3.2, ESFAS Table 3.3-3, Functional Units 3.c.3 and 3.c.4. In this respect, CTS 3.3.3.1 is redundant to the requirements of CTS 3.3.2 for containment radioactivity instrumentation, both involving the same radiation monitors: one gaseous and one particulate containment atmosphere radiation monitor (only one of which is required to be OPERABLE). This changes the CTS by eliminating the 4-hour time restriction to adjust the setpoint to within limits and applying the requirement of CTS 3.3.2, Action a (ITS Table 3.3.2-1, footnote (g), to reset the setting to within the calibration tolerance of the Trip Setpoint at the completion of the surveillance. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	Table 3.3.6-1, footnote (d)	3.3.3.1 Action a	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
Refer to DOC section in ML23151A447	**Section 3.4, Reactor Coolant System (RCS)**			
3.4.1 L01	CTS 3.2.5 ACTION requires THERMAL POWER to be reduced to less than 5% of RTP within the next 4 hours if the DNB parameters are not restored to within limit in 2 hours. ITS 3.4.1 ACTION B requires the power reduction to less than or equal to 5% RTP (MODE 2) within the next 6 hours if the DNB parameters are not restored to within limit in 2 hours. This changes the CTS by extending the time for the unit to be placed outside the MODE of Applicability. The change that allows the THERMAL POWER reduction to be only to 5% RTP is discussed in DOC 3.4.1 A02. This change is designated as less restrictive because additional time is allowed to restore parameters to within the LCO limits than was allowed in the CTS.	3.4.1 ACTION B	3.2.5 Action	3
3.4.2 L01	CTS 4.1.1.4 states that the RCS T_{avg} shall be determined to be ≥ 541°F within 15 minutes prior to achieving reactor criticality, and every 30 minutes when the reactor is critical, RCS T_{avg} is less than 547°F, and the T_{avg} – T_{ref} deviation alarm is not reset. ITS Surveillance Requirement (SR) 3.4.2.1 requires RCS T_{avg} in each loop to be verified ≥ 541°F "In accordance with the Surveillance Frequency Control Program." This changes the CTS by replacing the requirements for verifying RCS T_{avg} within limits 15 minutes prior to achieving criticality and every 30 minutes when the reactor is critical with "In accordance with the Surveillance Frequency Control Program" (the Frequency in the SFCP is 12 hours). This change is designated as less restrictive because Surveillances will be performed less frequently under the ITS than under the CTS.	SR 3.4.2.1	4.1.1.4	7

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.3 L01	CTS 3.4.9.1 Action requires restoration in 30 minutes if the LCO is not met. ITS 3.4.3 ACTION C.1 requires immediately initiating Action to restore. This changes the CTS by not providing a limit on when restoration has to be completed. ITS 3.4.3 ACTION C.2 requires evaluation of the RCS to be acceptable for continued operation prior to operation above MODE 4. The CTS requires evaluation for continued operation above MODE 5 with RCS T_{avg} greater or equal to 200 °F and pressure greater than or equal to 500 psig. This changes the CTS by allowing operation throughout MODE 5. This change is designated as less restrictive because additional time is allowed to restore parameters to within the LCO limits than was allowed in the CTS.	3.4.3 ACTION C.1 ACTION C.2	3.4.9.1 Action	3
3.4.5 L01	CTS 4.4.1.2.1 states that the required reactor coolant pumps, if not in operation, shall be determined to be OPERABLE by verifying correct breaker alignment and indicated power availability. ITS SR 3.4.5.3 requires verification of correct breaker alignment and indicated power availability to each required pump. It is modified by a Note that states "Not required to be performed until 24 hours after a required pump is not in operation." This changes the CTS by not requiring the SR to be performed until 24 hours after a pump is taken out of operation. This change is designated as less restrictive because Surveillances will be performed less frequently under the ITS than under the CTS.	SR 3.4.5.3	4.4.1.2.1	7
3.4.5 L02	CTS 3.4.1.2 ACTION b states to "open the Reactor Trip breaker with less than three reactor coolant loops in operation." ITS 3.4.5 states to place the Rod Control System in a condition incapable of rod withdrawal. This changes the CTS by allowing alternate options to preclude rod withdrawal besides opening the reactor trip breakers.	3.4.5	3.4.1.2 Action b	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.5 L02 (continued)	This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.			
3.4.5 L03	CTS 3.4.1.2 * states, in part, “All reactor coolant pumps may be deenergized.” ITS 3.4.5 LCO Note states, in part, “All reactor coolant pumps may be removed from operation.” This changes the CTS by removing “deenergized” and adding “removed from operation.” This change is designated as less restrictive because less stringent LCO requirements are being applied in the ITS than were applied in the CTS.	3.4.5 LCO	3.4.1.2	1
3.4.5 L04	CTS 3.4.1.2 requires all of the reactor coolant loops listed below [RCS Loops A, B, and C are listed with associated steam generator and reactor coolant pump] shall be OPERABLE with all reactor coolant loops in operation when the Reactor Trip breakers are closed, and two reactor coolant loops listed below shall be OPERABLE with at least one reactor coolant loop in operation when the Reactor Trip breakers are open. ITS LCO 3.4.5 requires two RCS loops to be OPERABLE and ITS LCO 3.4.5.a requires two RCS loops to be in operation when the Rod Control System is capable of rod withdrawal. Additionally, ITS 3.4.5 Condition A applies when one required RCS loop (i.e., two RCS loops) is inoperable. This changes the CTS by reducing the required number of RCS loops to be OPERABLE and in operation when the Rod Control System is capable of rod withdrawal from three to two and revised applicable actions to reflect this change. This change is designated as less restrictive because less stringent LCO requirements are being applied in the ITS than were applied in the CTS.	3.4.5 LCO	3.4.1.2 Action a Action b	1

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.5 L05	CTS 3.4.1.2 specifies the minimum number of reactor coolant loops required to be OPERABLE and in operation in MODE 3 depending on whether the Reactor Trip breakers are closed and the Reactor Trip breakers are open. This requirement is modified by footnote *. CTS 3.4.1.2 footnote * states, in part, that all reactor coolant pumps may be deenergized for up to 1 hour provided: (1) no operations are permitted that would cause dilution of the Reactor Coolant System boron concentration, and . . .. ITS LCO 3.4.5 also specifies the minimum number of reactor coolant loops required to be OPERABLE and in operation in MODE 3. ITS LCO 3.4.5 is modified by a Note that states, in part, "All reactor coolant pumps may be removed from operation for ≤ 1 hour per 8-hour period provided: a. No operations are permitted that would cause introduction of coolant into the RCS with boron concentration less than required to meet the SDM of LCO 3.1.1; . . ." This changes the CTS by allowing coolant with boron concentration less than the RCS boron concentration, but greater than the boron concentration limit in ITS LCO 3.1.1, to be added to the RCS when the RHR loops are not in operation. This change is designated as less restrictive because less stringent requirements are being applied in the ITS than were applied in the CTS.	LCO 3.4.5	3.4.1.2	1
3.4.6 L01	CTS 3.4.1.3 ACTION a states, in part, that with less than the above required loops OPERABLE, the unit must be placed in COLD SHUTDOWN within 24 hours. ITS 3.4.6 Required Action A.2 states that when one required loop is inoperable, the unit must be placed in MODE 5 within 24 hours, but only if an RHR loop is OPERABLE. This changes the CTS by providing an exception to the requirements to be in MODE 5.	3.4.6 Required Action A.2	3.4.1.3 Action a	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.6 L01 (continued)	This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.			
3.4.6 L02	CTS 4.4.1.3.1 states, in part, the required RCP(s), if not in operation, shall be determined to be OPERABLE in accordance with the Surveillance Frequency Control Program (SFCP) by verifying correct breaker alignments and indicated power availability. ITS SR 3.4.6.3 requires verification of correct breaker alignment and indicated power availability to the pump not in operation in accordance with the SFCP. It is modified by a Note that states "Not required to be performed until 24 hours after a required pump is not in operation." This changes the CTS by not requiring the SR to be performed until 24 hours after a pump is taken out of operation. This change is designated as less restrictive because Surveillances will be performed less frequently under the ITS than under the CTS.	SR 3.4.6.3	4.4.1.3.1	7
3.4.6 L03	CTS 3.4.1.3 * states, in part, "All reactor coolant pumps and RHR pumps may be deenergized." ITS 3.4.6 LCO Note, in part, states "All reactor coolant pumps (RCPs) and RHR pumps may be removed from operation." This changes the CTS by removing "deenergized" and adding "removed from operation." This change is designated as less restrictive because less stringent LCO requirements are being applied in ITS than under the CTS.	3.4.6 LCO	3.4.1.3	1
3.4.6 L04	CTS 3.4.1.3 ** states, in part, "the secondary water temperature of each steam generator is less than 50°F above each of the Reactor Coolant System cold leg temperatures." ITS 3.4.6 LCO Note 2 states "the secondary side water temperature of each SG is ≤ 50°F above each of the RCS cold leg temperatures." This changes the CTS by adding "or equal to" to less than 50°F.	3.4.6 LCO	3.4.1.3	1

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.6 L04 (continued)	This change is designated as less restrictive because less stringent LCO requirements are being applied in ITS than under the CTS.			
3.4.6 L05	CTS 3.4.1.3 specifies the minimum number of reactor coolant loops and residual heat removal (RHR) loop combinations required to be OPERABLE and in operation in MODE 4. CTS 3.4.1.3 footnote * states, in part, that all reactor coolant pumps and RHR pumps may be deenergized for up to 1 hour provided: (1) no operations are permitted that would cause dilution of the Reactor Coolant System boron concentration, and . . .. ITS LCO 3.4.6 also specifies the minimum number of reactor coolant loops and RHR loop combinations required to be OPERABLE and in operation in MODE 4. ITS LCO 3.4.6 is modified by a Note that states, in part, "All reactor coolant pumps (RCPs) and RHR pumps may be removed from operation for ≤ 1 hour per 8 hour period provided: a. No operations are permitted that would cause introduction of coolant into the RCS with boron concentration less than required to meet the SDM of LCO 3.1.1; . . ." This changes the CTS by allowing coolant with boron concentration less than the RCS boron concentration, but greater than the boron concentration limit in ITS LCO 3.1.1, to be added to the RCS when the RHR loops are not in operation. This change is designated as less restrictive because less stringent requirements are being applied in ITS than under the CTS.	LCO 3.4.6	3.4.1.3	1
3.4.7 L01	CTS 3.4.1.4.1 requires the RHR loops to be OPERABLE and for at least one RHR pump to be operating in MODE 5. ITS 3.4.7 specifies the same requirements; however, ITS LCO 3.4.7 Note 4 allows all RHR loops to be removed from operation during planned heatup to MODE 4 when at least one RCS loop is in operation. This changes the CTS by adding an allowance for all RHR loops to be removed from operation during planned heatup operations to MODE 4.	LCO 3.4.7	3.4.1.4.1	1

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.7 L01 (continued)	This change is designated as less restrictive because less stringent LCO requirements are being applied in the ITS than were applied in the CTS.			
3.4.7 L02	CTS 3.4.1.4.1 * states, in part, “The RHR pump may be deenergized.” ITS 3.4.7 LCO Note, in part, states “The RHR pump of the loop in operation may be removed from operation.” This changes the CTS by removing “deenergized” and adding “removed from operation.” This change is designated as less restrictive because less stringent LCO requirements are being applied in the ITS than were applied in the CTS.	3.4.7 LCO Note	3.4.1.4.1	1
3.4.7 L03	CTS 3.4.1.4.1 specifies the minimum number of residual heat removal (RHR) loops required to be OPERABLE and in operation in MODE 5 with the RCS loops filled. CTS 3.4.1.4.1 footnote * states, in part, that the RHR pump may be deenergized for up to 1 hour provided: (1) no operations are permitted that would cause dilution of the Reactor Coolant System boron concentration. ITS LCO 3.4.7 also specifies the minimum number of residual heat removal (RHR) loops required to be OPERABLE and in operation in MODE 5 with the RCS loops filled. ITS LCO 3.4.7 is modified by a Note that states, in part, “The RHR pump of the loop in operation may be removed from operation for ≤ 1 hour per 8 hour period provided: a. No operations are permitted that would cause introduction of coolant into the RCS with boron concentration less than required to meet the SDM of LCO 3.1.1; . . ." This changes the CTS by allowing coolant with boron concentration less than the RCS boron concentration, but greater than the boron concentration limit in ITS LCO 3.1.1, to be added to the RCS when the RHR loops are not in operation. This change is designated as less restrictive because less stringent requirements are being applied in the ITS than were applied in the CTS.	LCO 3.4.7	3.4.1.4.1	1

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.8 L01	CTS 3.4.1.4.2 ** states, in part, "The RHR pump may be deenergized." ITS 3.4.8 LCO Note, in part, states "All RHR pumps may be removed from operation." This changes the CTS by removing "deenergized" and adding "removed from operation." This change is designated as less restrictive because less stringent LCO requirements are being applied in the ITS than were applied in the CTS.	3.4.8 LCO Note	3.4.1.4.2	1
3.4.8 L02	CTS 3.4.1.4.2 specifies the minimum number of residual heat removal (RHR) loops required to be OPERABLE and in operation in MODE 5 with the RCS loops not filled. CTS 3.4.1.4.2 footnote * states, in part, that the RHR pump may be deenergized for up to 1 hour provided: (1) no operations are permitted that would cause dilution of the Reactor Coolant System boron concentration, and . . . . ITS LCO 3.4.8 also specifies the minimum number of residual heat removal (RHR) loops required to be OPERABLE and in operation in MODE 5 with the RCS loops not filled. ITS LCO 3.4.8 is modified by a Note that states, in part, "All RHR pumps may be removed from operation for ≤ 15 minutes when switching from one loop to another provided: . . . b. No operations are permitted that would cause introduction of coolant into the RC" with boron concentration less than required to meet the SDM of LCO 3.1.1; . . ." This changes the CTS by allowing coolant with boron concentration less than the RCS boron concentration, but greater than the boron concentration limit in ITS LCO 3.1.1, to be added to the RCS when the RHR loops are not in operation. This change is designated as less restrictive because less stringent requirements are being applied in the ITS than were applied in the CTS.	LCO 3.4.8	3.4.1.4.2	1

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.9 L01	CTS 3.4.3 Action b requires the unit to be in Hot Standby with the Reactor Trip System breakers open within 6 hours and Hot Shutdown within the following 6 hours. ITS 3.4.9 ACTIONS A.2 and A.3 require the rods to be fully inserted and the Rod Control System to be placed in a condition incapable of rod withdrawal and other Actions require the unit to be placed in Mode 3 in 6 hours and Mode 4 within 12 hours. This changes the CTS by allowing alternate options to preclude rod withdrawal besides opening the reactor trip breakers (RTBs). This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.4.9 ACTION A.2 ACTION A.3	3.4.3 Action b	4
3.4.10 L01	CTS 3.4.2.1 and CTS 3.4.2.2, in part, provide requirements for the pressurizer code safety valves in MODES 1 through 5. ITS LCO 3.4.10 provides Applicability in MODES 1, 2, 3, and MODE 4 with all RCS cold leg temperatures >275ºF. The ITS Applicability is modified by a Note that allows the lift settings to not be within the LCO limits during MODES 3 and 4 for the purpose of in-situ setting of the pressurizer safety valves under ambient (hot) conditions. The exception is allowed for 54 hours following entry into MODE 3 provided a preliminary cold setting was made prior to heatup. This changes the CTS by allowing entry into MODE 3 and 4 without verifying that the pressurizer code safety valve lift settings are within the LCO limits. This change is designated as less restrictive because the LCO requirements are applicable in fewer operating conditions than in CTS.	LCO 3.4.10	3.4.2.1 3.4.2.2	2

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.10 L02	CTS 3.4.2.1 requires a safety valve to be OPERABLE in MODES 4 and 5. Additionally, LCO 3.4.2.1 is modified by footnote * that states, "While in MODE 5, an equivalent size pathway may be used provided that the vent pathway is not isolated or sealed." ITS 3.4.10 requires three safety valves to be OPERABLE in MODE 4 with all RCS cold leg temperatures > 275°F. This changes the operating conditions in which pressurizer safety valves are required to be OPERABLE. The change in the number of required safety valves is discussed in DOC M01. This change is designated as less restrictive because the LCO requirements are applicable in fewer operating conditions than in CTS.	LCO 3.4.10	3.4.2.1	2
3.4.10 L03	The CTS 3.4.2.1 Action states that with no pressurizer safety valve OPERABLE to immediately suspend all operations involving reactivity changes and to place an OPERABLE RHR loop into operation in the shutdown cooling mode. With no pressurizer safety valves OPERABLE (i.e., all three safety valves are inoperable), ITS 3.4.10 ACTION B requires the unit to be in MODE 3 in 6 hours and MODE 4 with any RCS cold leg temperature ≤ 275° in 24 hours. This places the unit outside of the Applicability of the Specification. This changes the CTS by replacing the CTS 3.4.2.1 Actions with new ACTIONS designed to place the unit outside of the Applicability of the Specification when no pressurizer safety valves are OPERABLE. The change to the Applicability is discussed in DOC L02, the change to the number of pressurizer safety valves required for OPERABILITY is discussed in DOC M01, and the Completion Time of 24 hours is discussed in L04. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.4.10 ACTION B	3.4.2.1 Action	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.10 L04	The CTS 3.4.2.2 Action states that with one of the three pressurizer safety valves inoperable either restore the inoperable valve to OPERABLE status within 15 minutes or be in at least Hot Standby (MODE 3) within 6 hours and Hot Shutdown (MODE 4) within 12 hours. Currently, no Actions are specified when two or three safety valves are inoperable. Thus CTS 3.0.3 must be entered. ITS 3.4.10 ACTION A allows 15 minutes to restore the inoperable pressurizer safety valve to OPERABLE status. ITS 3.4.10 ACTION B requires the unit to be in MODE 3 in 6 hours and MODE 4 with any RCS cold leg temperature ≤ 275°F within 24 hours if the valve is not restored within the 15 minutes or if two or more pressurizer safety valves are inoperable. This changes the CTS by extending the time to place the unit outside of the Applicability and allows the unit not to enter LCO 3.0.3 when two or more pressurizer safety valves are found to be inoperable. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.4.10 ACTION A	3.4.2.2 Action	4
3.4.11 L01	CTS 4.4.4 requires each block valve to be demonstrated OPERABLE by operating the valve through one complete cycle of full travel. ITS SR 3.4.11.1 requires a similar surveillance and adds two Notes. Note 1 states the Surveillance is not required to be performed with a block valve closed in accordance with the Required Actions of the LCO. Note 2 states the Surveillance is only required to be performed in MODES 1 and 2. This changes the CTS by not requiring a cycle of the block valve when required to be closed via the Required Actions, and by not requiring performance of the Surveillance prior to entry into MODE 3. These changes are designated as less restrictive because Notes apply less stringent the Surveillance will be performed less frequently under the ITS than under the CTS.	SR 3.4.11.1	4.4.4	7

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.12 L01	Actions b and c of CTS 3.4.9.3 provide Completion Times to restore an inoperable PORV and, if not restored with the stated Completion Time, the RCS must be depressurized and vented through at least a 2.20 square inch vent within the next 8 hours. Action c, however, permits 24 hours to depressurize the RCS and vent through at least a 2.20 square inch vent when both PORVs are inoperable. The CTS is changed to permit 24 hours to depressurize the RCS and vent through at least a 2.20 square inch vent in any of the aforementioned cases. This changes the CTS by increasing the Completion Time to depressurize and vent the RCS from 8 hours to 24 hours when a PORV is not restored to OPERABLE status within its stated Completion Time. This change is designated as less restrictive because additional time is allowed to restore parameters to within the LCO limits than was allowed in the CTS.	3.4.12	3.4.9.3 Action b Action c	3
3.4.13 L01	CTS 3.4.6.2 a states, in part, to be in at least HOT STANDBY within 6 hours if not within the limits for any PRESSURE BOUNDARY LEAKAGE, or with any primary-to-secondary leakage. ITS 3.4.13 states to “isolate affected component, pipe, or vessel from the RCS by use of a closed manual valve, closed and de-activated automatic valve, blind flange, or check valve within 4 hours.” This changes the CTS by allowing 4 hours to isolate the leakage versus shutting down to MODE 3 in 6 hours. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.4.13	3.4.6.2 Action a	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.13 L02	CTS 3.4.6.2 a. and b. specify that if the requirements of CTS 3.4.6.2.a or b are not satisfied, the reactor shall be placed in COLD SHUTDOWN. ITS 3.4.13 Condition C requires that if the Required Actions and associated Completion Times have not been met, the reactor must be placed in MODE 3 within 6 hours and in MODE 4 within a total of 12 hours, which is consistent with the CTS Applicability. This changes CTS 3.4.6.2.a and b requirement to be in COLD SHUTDOWN by adopting the ITS requirement to be in MODE 4. This change is designated as less restrictive because the ITS only requires a cool down to MODE 4 (< 350 °F) while the CTS requires a cool down to COLD SHUTDOWN (≤ 200 °F).	3.4.13 Condition C	3.4.6.2 Action a Action b	4
3.4.13 L03	CTS 4.4.6.2.1.a requires monitoring of the containment atmosphere gaseous or particulate radioactivity in accordance with the Surveillance Frequency Control Program. CTS 4.4.6.2.1.b requires monitoring the containment sump level in accordance with the Surveillance Frequency Control Program. CTS 4.4.6.2.1.d requires monitoring the reactor head flange leakoff system in accordance with the Surveillance Frequency Control Program. The ITS does not contain these Surveillance Requirements. This changes the CTS by deleting these Surveillance Requirements. This change is designated as less restrictive because Surveillances which are required in the CTS will not be required in the ITS.	None	4.4.6.2.1.a 4.4.6.2.1.b 4.4.6.2.1.d	5
3.4.14 L01	CTS 3.4.6.2 Action c and Action d specify, in part, that if the leakage requirements are not satisfied, the reactor shall be placed in COLD SHUTDOWN. ITS 3.4.13 Condition B requires that if the Required Actions and associated Completion Times have not been met, the reactor must be placed in MODE 3 within 6 hours and in MODE 4 within a total of 12 hours, which is consistent with the CTS Applicability. This changes CTS 3.4.6.2 Action c and Action d	3.4.13 Condition B	3.4.6.2 Action c Action d	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.14 L01 (continued)	requirement to be in COLD SHUTDOWN by adopting the ITS requirement to be in MODE 4. This change is designated as less restrictive because the ITS only requires a cool down to MODE 4 (< 350 °F) while the CTS requires a cool down to COLD SHUTDOWN (≤ 200 °F).			
3.4.14 L02	CTS 3.4.6.2 ACTION c.1 states "Within 4 hours verify that at least two valves in each high-pressure line having a non-functional valve are in, and remain in that mode corresponding to the isolated condition." ITS 3.4.14 Required Action A.1 states that the flow path must be isolated by one valve. This changes the CTS by changing from isolating with two valves to one valve. This change is designated as less restrictive because less stringent Required Actions are being applied in ITS then CTS.	3.4.14 Required Action A.1	3.4.6.2 Action c.1	4
3.4.14 L03	CTS 3.4.6 Action d states "With any Reactor Coolant System Pressure Isolation Valve leakage greater than 5 gpm, reduce leakage to below 5 gpm within 1 hour." ITS Required Action A.2 requires restoration of the PIV leakage limits within 72 hours. This changes the CTS by increasing the completion time. This change is designated as less restrictive because additional time is allowed to restore parameters to within the LCO limits than was allowed in the CTS.	Required Action A.2	3.4.6 Action d	3
3.4.14 L04	CTS 3.4.6.2 is applicable in MODES 1, 2, 3, and 4. ITS 3.4.14 is applicable in MODES 1,2, and 3, and in MODE 4, except valves in the residual heat removal (RHR) flow path when in, or during the transition to or from, the RHR mode of operation. This changes the CTS by exempting the RHR flow path PIVs from the leakage requirements when in or during the transition to or from the RHR mode of operation.	3.4.14	3.4.6.2	2

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.14 L04 (continued)	This change is designated as less restrictive because less stringent LCO requirements are being applied in the ITS than are being applied in the CTS.			
3.4.14 L05	ITS 3.4.14 contains requirements for the RHR autoclosure interlock function. The CTS includes SR 4.5.2.e.1 for this CTS function in CTS 3.5.2, “ECCS Subsystems – T_{avg} Greater Than or Equal to 350 °F;” however, CTS 3.5.2 does not provide a direct ACTION related to an inoperable RHR System autoclosure interlock function. As a result, identification of an inoperable RHR System autoclosure interlock function may result in entry into LCO 3.0.3. ITS 3.4.14 ACTION C requires the affected penetration for an inoperable RHR autoclosure interlock function to be isolated within 4 hours. This changes the CTS by providing 4 hours to isolate an affected penetration in lieu of immediate entry into LCO 3.0.3. This change is designated as less restrictive because less stringent Required Actions are being applied in ITS then CTS.	3.4.14	3.5.2 4.5.2.e.1	4
3.4.15 L01	Not used.	N/A	N/A	N/A
3.4.15 L02	Not used.	N/A	N/A	N/A
3.4.15 L03	CTS 3.4.6.1 ACTIONS a and b state that if the specified requirements are not satisfied, the reactor shall be placed in COLD SHUTDOWN. ITS 3.4.15 Condition D requires that if the Required Actions and associated Completion Times have not been met, the reactor must be placed in MODE 3 within 6 hours and in MODE 4 within a total of 12 hours, which is consistent with the CTS Applicability. This changes CTS 3.4.6.2 ACTIONS a and b requirements to be in COLD SHUTDOWN by adopting the ITS requirement to be in MODE 4.	3.4.15 Condition D	3.4.6.1 Action a Action b	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.15 L03 (continued)	This change is designated as less restrictive because the ITS only requires a cool down to MODE 4 (< 350 °F) while the CTS requires a cool down to COLD SHUTDOWN (≤ 200 °F).			
3.4.15 L04	CTS 3.4.6.1 ACTION b states "With no Containment Sump Level Monitoring System operable, restore at least one Containment Sump Level Monitoring System to OPERABLE status within 7 days." ITS 3.4.15 Required Action A.1 states to perform SR 3.4.13.1 once per 24 hours and restore the required containment sump monitor to OPERABLE status within 30 days. This changes the CTS by increasing the Completion Time to restore the sump monitor from 7 days to 30 days. This change is designated as less restrictive because additional time is allowed to restore parameters to within the LCO limits than was allowed in the CTS.	3.4.15 Required Action A.1	3.4.6.1 Action b	3
3.4.16 L01	CTS 3.4.8 Note states "LCO 3.0.4.c is applicable to DOSE EQUIVALENT I-131." ITS 3.4.16 ACTION A (I-131) and ACTION B (Xe-133) contains a Note that states "LCO 3.0.4.c is applicable." This changes the CTS by including DEX-133 in the allowance that makes LCO 3.0.4.c applicable.	3.4.16 ACTION A	3.4.8 Action Note	None
3.4.16 L02	ITS SR 3.4.16.1 and SR 3.4.16.2 contain a Note that states "Only required to be performed in MODE 1." The CTS SRs do not contain this allowance. This changes the CTS by adding the SR Note to the SRs that verify DEI-131 and DEX-133.	SR 3.4.16.1 SR 3.4.16.2	None	7

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
Refer to DOC section in ML23151A448	**Section 3.5, Emergency Core Cooling Systems (ECCS)**			
3.5.1 L01	CTS 3.5.1 ACTION a states, in part, "inoperable accumulator to OPERABLE status within 1 hour." ITS 3.5.1 ACTION B.1 states "Restore accumulator to OPERABLE status within 24 hours." This changes the CTS by increasing the Completion Time from 1 hour to 24 hours. This change is designated as less restrictive because additional time is allowed to restore parameters to within the LCO limits than was allowed in the CTS.	3.5.1 Required Action B.1	3.5.1 Action a	3
3.5.1 L02	CTS 3.5.1 Required Action b states "reduce pressurizer pressure to less than 1000 psig within the following 6 hours." ITS 3.5.1 Required Action C.2 states, "Reduce RCS pressure to ≤ 1000 psig within the following 6 hours." This changes the CTS by adding "or equal to" to less than 1000 psig. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.5.1 Required Action C.2	3.5.1 Action b	4
3.5.1 L03	CTS SR 4.5.1.1.b states "within 6 hours after each solution volume increase of greater than or equal to 1% of tank volume." ITS SR 3.5.1.4 states "Once within 6 hours after each solution volume increase of 1% of tank volume that is not the result of addition from the refueling water storage tank." This changes the CTS by stating tank volume that is not the result of addition from the refueling water storage tank (RWST). This change is designated as less restrictive because less stringent SRs are being applied in the ITS than were applied in the CTS.	SR 3.5.1.4	4.5.1.1.b	6

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.5.2 L01	CTS SR 4.5.2.g.1 requires the position stops for ECCS throttle valves be verified to be in the correct position within 4 hours following completion of each valve stroking operation or maintenance on the valve when the valve is required to be OPERABLE. ITS SR 3.5.2.7 also requires verification, for each specified ECCS throttle valve, the position stop is in the correct position but does not contain this frequency requirement. This changes the CTS by eliminating a frequency requirement from TSs. This change is designated as less restrictive because Surveillances may be performed less frequently under the ITS than under the CTS.	SR 3.5.2.7	4.5.2.g.1	7
3.5.2 L02	CTS LCO 3.5.2.a requires four HHSI pumps, each capable of being powered from its associated DG with discharge flow paths aligned to the RCS cold legs. The LCO is modified by a footnote * that requires only three HHSI pumps (two associated with the unit and one from the opposite unit) with associated EDG and associated flow paths aligned to the RCS cold leg to be OPERABLE when the opposite unit is in MODE 4, 5, 6, or defueled. CTS 3.5.2, ACTION c, requires, with one of the four required HHSI pumps or its associated discharge flow path inoperable and the opposite unit in MODE 1, 2, or 3, the pump or flow path to be restored to OPERABLE status within 30 days or be in at least HOT STANDBY within the next 12 hours and in HOT SHUTDOWN within the following 6 hours. CTS 3.5.2, ACTION d, is for the case when two of four HHSI pumps or associated EDG or flow paths to the RCS cold legs are inoperable in MODE 1, 2, or 3, and CTS 3.5.2, ACTION e, is for the case when one of three required HHSI pumps or its associated discharge flow path inoperable. Both CTS 3.5.2, ACTION d and e, allow 72 hours or in accordance with the RICT Program for restoration. ITS LCO 3.5.2 requires three HHSI subsystems to be OPERABLE. When one or more required HHSI subsystems are inoperable, ITS 3.5.2, ACTION A, requires restoration of one required inoperable subsystem within 72 hours or in accordance with the RICT Program. This changes the CTS by	3.5.2 LCO ACTION A	3.5.2 LCO Action a Action c Action d Action e	1

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.5.2 L02 (continued)	requiring three HHSI pumps to be OPERABLE per unit regardless of the opposite unit's MODE. This also changes the CTS by deleting the 30-day Action to restore one HHSI pump to OPERABLE status when one of four HHSI pumps or associated flow paths are inoperable and the opposite unit is in MODE 1, 2, or 3. This change is designated as less restrictive because less stringent LCO and ACTION requirements are being applied in the ITS than were applied in the CTS.			
3.5.2 L03	CTS 3.5.2, ACTION a, states if one RHR heat exchanger, suction flow path from the containment sump, RHR parallel injection flow path, or SI parallel injection flow path is inoperable to restore the component to OPERABLE status within 72 hours or in accordance with the RICT Program. ITS 3.5.2, ACTION C, states with one or more RHR subsystems inoperable for reasons other than Condition B (one RHR pump inoperable), restore RHR subsystem(s) to OPERABLE status within 72 hours or in accordance with the RICT Program. ITS 3.5.2, Condition A, states with one or more required HHSI subsystems inoperable to restore required HHSI subsystems to OPERABLE status within 72 hours or in accordance with the RICT Program. ITS 3.5.2, Condition F, states with less than 100% of the ECCS flow equivalent to a single OPERABLE RHR subsystem available or with less than 100% of the ECCS flow equivalent to two OPERABLE HHSI subsystems available, to enter LCO 3.0.3 immediately. This changes the CTS by allowing more than one subsystem to be inoperable for 72 hours or in accordance with the RICT Program versus entering LCO 3.0.3 provided the remaining OPERABLE ECCS components are capable of performing the required ECCS safety function. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS	3.5.2 ACTION A ACTION C ACTION F	3.5.2 Action a	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.5.2 L04	CTS 4.5.2.f.1 and CTS 4.5.2.f.2 requires verifying that each automatic valves in the flow path actuates to its correct position and verifying each pump starts automatically on a SI actuation test signal, respectively. ITS SR 3.5.2.5 and ITS SR 3.5.2.6 specifies that the signal may be from either an "actual" or simulated (i.e., test) signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test. This change is designated as less restrictive because less stringent SRs are being applied in the ITS than were applied in the CTS.	SR 3.5.2.5 SR 3.5.2.6	4.5.2.f.1 4.5.2.f.2	6
3.5.3 L01	ITS 3.5.3 contains a Note that allows an RHR train to be considered OPERABLE during alignment and operation for decay heat removal (DHR) if the RHR train is capable of being manually realigned to the ECCS mode of operation. CTS 3.5.3 does not contain this allowance. This changes the CTS by adding a Note that allows the RHR system to be considered OPERABLE while aligning for DHR if it can be manually realigned to the RHR mode of operation. This change is designated as less restrictive because less stringent LCO requirements, in the form of an LCO Note, are being applied in the ITS than were applied in the CTS.	3.5.3	3.5.3	1
3.5.3 L02	CTS 3.5.3 ACTION a allows one hour to restore an ECCS flow path from the Refueling Water Storage Tank (RWST) and, if it cannot be restored, requires a cooldown to COLD SHUTDOWN. ITS 3.5.3 requires an immediate initiation of Action to restore the ECCS train. This changes CTS by eliminating a cooldown requirement if the flow path cannot be restored. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.5.3 ACTION A	3.5.3 Action a	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.5.4 L01	CTS 3.5.4 ACTION allows 1 hour to restore an inoperable RWST. ITS 3.5.4 ACTION A allows 8 hours to restore the RWST to OPERABLE status if the inoperability is due to the RWST boron concentration or temperature not within limits. ITS 3.5.4 ACTION B requires the restoration of the RWST to an OPERABLE status within 1 hour for reasons other than Condition A. This changes the CTS by increasing the Completion Time for restoration of an inoperable RWST due to boron concentration or temperature not within limits from 1 hour to 8 hours. This change is designated as less restrictive because additional time is allowed to restore parameters to within the LCO limits than was allowed in the CTS.	3.5.4 ACTION A	3.5.4 Action	3
3.5.4 L02	CTS 3.5.4 ACTION, in part, specifies that if the requirements of CTS 3.5.4 are not satisfied, the reactor shall be placed in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. ITS 3.5.4 Condition C states that if the Required Actions and associated Completion Times have not been met, the reactor must be placed in MODE 3 within 6 hours and in MODE 4 within a total of 12 hours. This changes the CTS by permitting a Required Action end state of hot shutdown (Mode 4) rather than an end state of cold shutdown (Mode 5). This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.5.4 ACTION C	3.5.4 Action	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
Refer to DOC section in ML23151A449	**Section 3.6, Containment Systems**			
3.6.1 L01	CTS 3.6.1.6 ACTION a states, in part, "With more than one tendon with an observed lift-off force between 90% and 95% of the predicted force, or with one tendon below 90% of the predicted force, restore the tendon(s) to the required level of integrity within 15 days." ACTION b states, in part, "With the average of all measured tendon forces for each type of tendon (dome, vertical, and hoop), including those measured in ACTION a, less than the predicted force, restore the tendon(s) to the required level of integrity within 15 days." ACTION c states, in part, "With any abnormal degradation of the structural integrity other than ACTION a. and ACTION b, at a level below the acceptance criteria of Specifications 4.6.1.6.1, 4.6.1.6.2, and 4.6.1.6.3, restore the containment to the required level of integrity within 72 hours." ITS LCO 3.6.1 ACTION A states with the containment inoperable restore the containment to an OPERABLE status within one hour. This changes the CTS by combining the listed abnormal degradation conditions and required actions that indicate a potentially inoperable containment into one condition, "Containment inoperable," and associated Required Action, eliminating the requirement to shut down the plant based on degraded conditions where containment may remain OPERABLE. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	SR 3.6.1 ACTION A	3.6.1.6 Action a Action b Action c	4
3.6.2 L01	CTS 3.6.1.3 ACTION b states "With the containment air lock inoperable, except as the result of an inoperable air lock door, maintain at least one air lock door closed; restore the inoperable air lock to OPERABLE status within 24 hours or in accordance with the RICT Program, or be in at least HOT STANDBY within the next six	3.6.2 ACTIONS Note 1 ACTION B	3.6.1.3 Action b	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.2 L01 (continued)	hours and in COLD SHUTDOWN within the following 30 hours." ITS 3.6.2 ACTION B provides a separate ACTION for inoperability of the air lock with an air lock interlock mechanism inoperable. ITS 3.6.2 ACTION B allows unlimited operation provided an OPERABLE door in the air lock is closed in 1 hour, locked closed in 24 hours, and verification is performed every 31 days that an OPERABLE air lock door in the air lock remains closed. For air lock doors in high radiation areas, this 31-day verification can be performed by administrative means. In addition, containment entry and exit through the air lock is permissible (i.e., the closed and locked door can be opened) under administrative control. Additionally, a new Note which applies to ITS 3.6.2 ACTIONS A, B, and C has been added. This Note, ITS 3.6.2 ACTIONS Note 1, states that entry and exit (i.e., the closed and locked OPERABLE air locks can be opened) is permissible to perform repairs on the affected air lock components. This changes the CTS by allowing unlimited operation, with certain restrictions, for air locks that are inoperable due to an inoperable lock mechanism and allows entry and exit to repair an inoperable door. These changes are designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.			
3.6.2 L02	CTS 3.6.1.3 ACTION a states "With one containment air lock inoperable, maintain at least the OPERABLE air lock door closed and either restore the inoperable air lock door to OPERABLE status within 24 hours or lock the OPERABLE air lock door closed" and "operation may then continue until performance of the next required overall air lock leakage test provided that the OPERABLE air lock door is verified to be locked closed at least once per 31 days." ITS 3.6.2 ACTION A contains similar requirements, but contains two Required Action Notes stating, "Required Actions A.1, A.2, and A.3 are not applicable if both	3.6.2 Required Action A Notes 1 and 2 Required Action A.3 Note	3.6.1.3 Action a	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.2 L02 (continued)	doors in the same air lock are inoperable and Condition C is entered" and "Entry and exit is permissible for 7 days under administrative controls if both air locks are inoperable." Additionally, ITS 3.6.2 Required Action A.3 contains a Note stating, "Air lock doors in high radiation areas may be verified locked closed by administrative means." This changes the CTS by ensuring that only the Required Actions and associated Completion Times of Condition C are required if both doors in the same air lock are inoperable, allowing use of the air lock for entry and exit for 7 days under administrative controls if both air locks are inoperable, and allowing air lock doors in high radiation areas to be verified locked closed by administrative means. These changes are designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.			
3.6.2 L03	CTS SR 4.6.1.3.a states, in part, that a vacuum test between the door seals of an airlock door shall be performed upon closing of the door at a frequency specified in the Containment Leakage Rate Testing Program. ITS 3.6.2 does not refer to a vacuum test between the door seals. The specific reference to a vacuum test is CTS SR 4.6.1.3.a is removed and replaced with generic reference to the Containment Leakage Rate Testing Program. This changes the CTS by allowing a vacuum test of the door seals or a pressure test of the airlock, either of which would be permitted under the Containment Leakage Rate Testing Program. This change is designated as less restrictive because less stringent SR acceptance methods are being applied in the ITS than were applied in the CTS.	SR 3.6.2.1	4.6.1.3.a	6

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.3 L01 3.6.3 L01 (continued)	CTS 3.6.4 ACTIONS b and c state that with one or more of the containment isolation valve(s) inoperable, isolate each affected penetration within 4 hours by use of one deactivated automatic valve secured in the isolation position, closed manual valve, or blind flange. As noted, ITS 3.6.3, ACTION C, only applies to penetration flow paths with only one CIV and a closed system. This ACTION requires that with one or more penetration flow paths with CIV inoperable, the penetration flow path be isolated by means similar to those specified in the CTS within 72 hours. This changes the CTS by extending the Completion Time from 4 hours to 72 hours when the inoperable containment isolation valve is in a single valve penetration associated with a closed system. This change is designated as less restrictive because additional time is allowed to restore the components to within the LCO limits than was allowed in the CTS.	3.6.3 ACTION C	3.6.4 Actions b & c	3
3.6.3 L02	CTS 3.6.4 ACTIONS b and c state that with one or more of the CIV(s) inoperable, isolate each affected penetration by use of at least one deactivated automatic valve secured in the isolation position (ACTION b), closed manual valve (ACTION c), or blind flange (ACTION c). CTS 4.6.1.1.a requires a periodic verification that the affected penetration remains isolated by the same methods. ITS 3.6.3, Required Action A.1, requires that when one or more penetration flow paths with one CIV inoperable the affected penetration flow path be isolated by use of at least one closed and de-activated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured. In addition, ITS 3.6.3 Required Action A.2 requires a periodic verification that the affected penetration remains isolated by one of the methods required by ITS 3.6.3 Required Action A.1. This changes the CTS by allowing penetration flow paths with two CIVs that have one containment isolation valve inoperable to use a check valve with flow through the valve secured as the means of isolating the penetration flow path.	3.6.3 Required Action A.1	3.6.4 Actions b & c	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.			
3.6.3 L03	CTS 4.6.4.2 states, in part, that each isolation valve shall be demonstrated OPERABLE during COLD SHUTDOWN or REFUELING MODE in accordance with the SFCP by verifying the valve actuates on an isolation signal. ITS SR 3.6.3.6 states to verify each automatic CIV that is not locked, sealed, or otherwise secured in position, actuates to the isolation position on an actual or simulated signal without requiring the verification to be perform in COLD SHUTDOWN or REFUELING MODES. This changes the CTS by removing the restriction on surveillance performance during specific MODES. The change is designated as less restrictive because less stringent SRs are being applied in the ITS than were applied in the CTS.	SR 3.6.3.6	4.6.4.2	7
3.6.3 L04	CTS 4.6.4.2 requires verification of the containment isolation valve actuation on specific isolation test signals, Phase A, Phase B, and Containment Ventilation. ITS SR 3.6.3.6 specifies that the signal may be either an “actual” or a “simulated” actuation signal. This changes the CTS by allowing the use of either an actual or a simulated signal for the test. This change is designated as less restrictive because less stringent SRs are being applied in the ITS than were applied in the CTS.	SR 3.6.3.6	4.6.4.2	6
3.6.3 L05	CTS 4.6.4.2 requires verification that each containment isolation valve actuates to its isolation position. CTS 4.6.1.1.a requires verification that all penetrations not capable of being closed by an OPERABLE CIV and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their closed positions except for valves, blind flanges, and deactivated	SR 3.6.3.2 SR 3.6.3.6	4.6.4.2.a 4.6.4.2.b 4.6.4.2.c 4.6.1.1.a	6

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.3 L05 (continued)	automatic valves which are located inside the containment and are locked, sealed, or otherwise secured in the closed position. ITS SR 3.6.3.2 requires verification that each containment isolation manual valve and blind flange that is located outside containment and not locked, sealed, or otherwise secured and required to be closed during accident conditions is closed, except for CIVs that are open under administrative controls. ITS SR 3.6.3.6 requires verification that each automatic CIV that is not locked, sealed, or otherwise secured in position, actuates to the isolation position on an actual or simulated actuation signal. This changes the CTS by not requiring automatic valves that are locked, sealed, or otherwise secured in position to have the valve position verified if outside containment or to be tested to verify that the valve automatically actuates to its isolation position. This change is designated as less restrictive because less stringent SRs are being applied in the ITS than were applied in the CTS.			
3.6.3 L06	CTS 4.6.1.1.a. requires verification that specified containment penetrations are closed. ITS 3.6.3 Required Actions A.2, C.2, ITS SR 3.6.3.2, and ITS SR 3.6.3.3 include similar requirements but contain a Note that allows valves and blind flanges in high radiation areas to be verified administratively. In addition, ITS 3.6.3 Required Actions A.2 and C.2 include a second Note that allows verification of isolation devices that are locked, sealed, or otherwise secured to be performed using administrative means. This changes the CTS by allowing certain valves and blind flanges to not require physical local verification. This change is designated as less restrictive because less stringent SRs are being applied in the ITS than were applied in the CTS.	3.6.3 Required Actions A.2, C.2 SR 3.6.3.2 SR 3.6.3.3	4.6.1.1.a	6

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.3 L07 3.6.3 L07 (continued)	CTS 3.6.1.1 states that the primary containment integrity shall be maintained with an exception that under administration control valves may be opened when necessary to perform surveillance, testing requirements, and/or corrective maintenance. ITS 3.6.3 Actions Note 1 contains a similar exception but does not include limiting the opening to those activities for performing surveillance, testing requirements, and/or corrective maintenance. This changes the CTS by eliminating the LCO exception restriction of opening valves under administrative control to only when performing surveillance, testing requirements, and/or corrective maintenance. This change is designated as less restrictive because a less stringent LCO is being applied in the ITS than was applied in the CTS.	3.6.3 ACTIONS Note 1	3.6.1.1	1
3.6.6 L01	CTS 3.6.2.1, Action a, states that with an inoperable Containment Spray System, restore the inoperable Spray System to OPERABLE status within 72 hours or in accordance with the RICT Program, or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. ITS 3.6.6 Action A, similarly, states that with one containment spray train inoperable, restore the containment spray train to an Operable status within 72 hours or in accordance with the RICT. ITS 3.6.6 Action B states that if the Required Action and associated Completion Time of Condition A is not met then action is required to place the unit in Mode 3 within 6 hours and Mode 4 within 54 hours. Additionally, ITS 3.6.6 Required Action B.2 includes a Note stating that LCO 3.0.4.a is not applicable when entering Mode 4. This changes the CTS by permitting a Required Action end state of hot shutdown (Mode 4) rather that an end state of cold shutdown (Mode 5). This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.6.6 Required Action B.2	3.6.2.1 Action a	4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.6 L02	CTS 4.6.2.1.d.1 and 2 states, in part, to verify that each automatic valve in the flow path actuates to its correct position and verify that each spray pump starts automatically, respectively, during shutdown. ITS SR 3.6.6.6 states to verify each automatic containment spray valve that is not locked, sealed, or otherwise secured in position, actuates to the isolation position on an actual or simulated signal without requiring the verification be performed in cold shutdown or refueling modes. SR 3.6.6.7 states to verify each containment spray pump starts automatically on an actual or simulated actuation signal without requiring the verification be performed in COLD SHUTDOWN or REFUELING MODES. This changes the CTS by removing the restriction on surveillance performance during specific MODES. The proposed change is designated as less restrictive because less stringent SRs are being applied in the ITS than were applied in the CTS.	SR 3.6.6.6 SR 3.6.6.7	4.6.2.1.d	7
3.6.6 L03	CTS 4.6.2.1.d.1 requires verification that each automatic valve in the flow path actuates to its correct position. ITS SR 3.6.6.6 requires verification that each automatic valve in the flow path "that is not locked, sealed, or otherwise secured in position" actuates to the correct position. This changes the CTS by excluding those automatic valves that are locked, sealed, or otherwise secured in position from the verification. This change is designated as less restrictive because Surveillances which are required in the CTS will not be required in the ITS.	SR 3.6.6.6	4.6.2.1. d.1	5

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.6 L04	CTS 4.6.2.1.d.1 and 4.6.2.1.d.2 require verification of the automatic actuation of containment spray components on a containment spray actuation “test” signal. CTS 4.6.2.2.b.1 requires two containment cooling units be verified to start automatically upon receipt of a safety injection (SI) test signal. ITS SR 3.6.6.6, SR 3.6.6.7, and SR 3.6.6.8 specify that the signal may be from either an “actual” or “simulated” (i.e., test) signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test. This change is designated as less restrictive because less stringent SRs are being applied in the ITS than were applied in the CTS.	SR 3.6.6.6 SR 3.6.6.7 SR 3.6.6.8	4.6.2.1.d.1 4.6.2.1.d.2 4.6.2.2.b.1	6
3.6.6 L05	CTS 3.6.2.2, Action a, states that with an inoperable emergency containment cooling unit, restore the inoperable cooling unit to OPERABLE status within 72 hours or in accordance with the RICT Program, or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. ITS 3.6.6 ACTION C, states that with one emergency containment cooling units inoperable, restore the emergency containment cooling unit to an OPERABLE status within 72 hours or in accordance with the RICT. ITS 3.6.6 Action D states that if the Required Action and associated Completion Time of Condition C is not met, action is required to place the unit in Mode 3 within 6 hours and Mode 4 within 12 hours. Additionally, ITS 3.6.6 Required Action D.2 includes a Note stating that LCO 3.0.4.a is not applicable when entering MODE 4. This changes the CTS by permitting a Required Action end state of HOT SHUTDOWN (MODE 4) rather that an end state of COLD SHUTDOWN (MODE 5). This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.6.6 ACTION D	3.6.2.2 Action a	6

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.7 L01	CTS 3.6.2.3, Action, states that with an inoperable Recirculation pH Control System, restore the buffering agent to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 72 hours. ITS 3.6.7 Action A, similarly, states that with Recirculation pH Control System inoperable, restore the Recirculation pH Control System to an OPERABLE status within 72 hours. ITS 3.6.7 Action B states that if the Required Action and associated Completion Time of Condition A is not met then action is required to place the unit in MODE 3 within 6 hours and MODE 4 within 54 hours. Additionally, ITS 3.6.7 Required Action B.2 includes a Note stating that LCO 3.0.4.a is not applicable when entering MODE 4. This changes the CTS by permitting a Required Action end state of HOT SHUTDOWN (MODE 4) rather that an end state of COLD SHUTDOWN (MODE 5). This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.6.7 Required Action B.2 and Note	3.6.2.3 Action	4
Refer to DOC section in ML23151A450	**Section 3.7, Plant Systems**			
3.7.1 L01	CTS 3.7.1.1, ACTION a, states, in part, that with one or more MSSVs inoperable in MODE 1 or 2 with a positive moderator temperature coefficient (MTC), reduce the Power Range Neutron Flux High Setpoint trip within 4 hours. ITS 3.7.1, ACTION A, requires only a reduction in THERMAL POWER to less than or equal to the Maximum Allowable % RTP specified in Table 3.7.1-1 for the number of OPERABLE MSSVs when one or more MSSVs are inoperable in MODE 2, irrespective of MTC condition. This changes the CTS by only requiring the Power Range Neutron Flux – High Setpoint trip be	3.7.1, ACTION A	3.7.1.1, Action a	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.1 L01 (continued)	reduced when in MODE 1 and requiring only a power reduction when one or more MSSVs are inoperable in MODE 2. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.			
3.7.1 L02	CTS 3.7.1.1, ACTION a, specifies the compensatory actions when one or more MSSVs are inoperable. The action allows operation to continue provided that within 4 hours, either the inoperable MSSV(s) are restored to OPERABLE status or the Power Range Neutron Flux High Setpoint trip is reduced per Table 3.7-1. ITS 3.7.1, Required Action B.2, requires the reduction of the Power Range Neutron Flux – High reactor trip setpoint to less than or equal to the Maximum Allowable percent RTP specified in Table 3.7.1-1 within 36 hours. This changes the CTS by extending the time allowed to reduce the Power Range Neutron Flux – High reactor trip setpoints. This change is designated as less restrictive, because additional time is allowed to restore parameters to within the LCO limits than was allowed in the CTS.	3.7.1, Required Action B.2	3.7.1.1, Action a	3
3.7.1 L03	CTS 4.7.1.1 requires verification of each MSSV lift setpoint pursuant to the INSERVICE TESTING PROGRAM. CTS Table 3.7-2 Footnote * states that the lift setting pressure shall correspond to ambient conditions of the valve at nominal operating temperature and pressure. ITS SR 3.7.1.1 requires the same testing; however, a Note has been included that requires the performance of the lift setpoint verification only in MODES 1 and 2, which corresponds to the valve's ambient conditions at normal operating temperature and pressure. This changes the CTS by adding a Note that requires performance of the MSSV lift setpoint verification only in MODES 1 and 2.	SR 3.7.1.1	4.7.1.1	7

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.1 L03 (continued)	This change is designated as less restrictive because Surveillances will be performed in fewer operating Conditions than in the CTS.			
3.7.2 L01	CTS 3.7.1.5 is applicable in MODES 1, 2, and 3. ITS LCO 3.7.2 is applicable in MODE 1, and in MODES 2 and 3 except when all MSIVs are closed and deactivated. This changes the CTS by making the Specification not applicable in MODES 2 and 3 when all MSIVs are closed and de-activated. This change is designated as less restrictive, because the ITS LCO requirements are applicable in fewer operating conditions than in the CTS.	3.7.2 Applicability	3.7.1.5 Applicability	2
3.7.3 L01	CTS 3.7.1.7 requires three FIVs, three FCVs, three FIV bypass valves, or three FCV bypass valves to be OPERABLE in MODES 1, 2 and 3. ITS LCO 3.7.3 requires three FIVs, three FCVs, three FIV bypass valves, and three FCV bypass valves to be OPERABLE in MODES 1, 2 and 3 except when all FIVs, FCVs, and associated bypass valves are closed and de-activated or isolated by a closed manual valve. This changes the CTS by making the Specification not applicable in MODES 1, 2, and 3 when all FIVs, FCVs, and associated bypass valves are closed and de-activated or isolated by a closed manual valve. This change is designated as less restrictive, because the ITS LCO requirements are applicable in fewer operating conditions than in the CTS.	3.7.3 Applicability	3.7.1.7 Applicability	2

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.4 L01	CTS Table 4.7-1, Item 1, require the secondary coolant system be tested for gross activity at least once per 72 hours. ITS 3.7.4 does not contain this Surveillance Requirement. This changes the CTS by deleting this Surveillance Requirement. This change is designated as a less restrictive removal of detail change because the Surveillance Frequency is being removed from the TSs.	None	Table 4.7-1 Item 1	5
3.7.5 L01	CTS 3.7.1.2 states, in part, that two independent auxiliary feedwater trains including 3 pumps shall be OPERABLE. CTS 3.7.1.2 Action 3) states, that with a single AFW pump inoperable, within 4 hours to verify OPERABILITY of two independent AFW trains or follow Action 1 or Action 2 for 1 or 2 inoperable AFW train(s), as applicable. ITS 3.7.5 states that two AFW trains shall be operable. This changes the CTS by reducing the number of AFW pumps required to be OPERABLE from three to two and deleting Action 3 for one of three AFW pumps inoperable. This change is designated as less restrictive because less stringent LCO and action requirements are being applied in the ITS than were applied in the CTS.	3.7.5	3.7.1.2 Action 3	1
3.7.5 L02	CTS 4.7.1.2.1.a.4 requires verifying that power is available to those components which require power for flow path operability at a frequency in accordance with the Surveillance Frequency Control Program. ITS 3.7.5 does not include this surveillance test requirement. This changes the CTS by deleting a Surveillance Requirement. This change is designated as less restrictive because Surveillance Requirements that were required in the CTS will not be required in the ITS.	3.7.5	4.7.1.2.1.a.4	5

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.5 L03	CTS 4.7.1.2.1.b.1) and 4.7.1.2.1.b.2) require verification of the automatic actuation of auxiliary feedwater components upon receipt of each Auxiliary Feedwater Actuation test signal. ITS SR 3.7.5.3 and SR 3.7.5.4 specify that the signal may be from either an "actual" or simulated (i.e., test) signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test. This change is designated as less restrictive because less stringent Surveillance Requirements are being applied in the ITS than were applied in the CTS.	SR 3.7.5.3 SR 3.7.5.4	4.7.1.2.1.b.1 4.7.1.2.1.b.2	6
3.7.5 L04	CTS 4.7.1.2.1.b.2) requires verifying that each auxiliary feedwater pump receives a start signal as designed automatically upon receipt of each Auxiliary Feedwater Actuation test signal. ITS SR 3.7.5.4 requires verifying that each AFW pump starts automatically on an actual or simulated actuation signal and includes a Note that states that this SR is only required to be performed in MODE 1. This changes the CTS by requiring the pump to start, instead of just receiving a start signal, and allowing the SR to only be required to be performed in MODE 1. This change is designated as less restrictive because Surveillances may be performed in less MODES under the ITS than under the CTS.	SR 3.7.5.4 and Note	4.7.1.2.1.b.2	7
3.7.6 L01	CTS 3.7.1.3 ACTION allows four hours, or 1 hour if < 210,000 gallons when the opposite unit is in MODES 1, 2, or 3, to restore the CST system to OPERABLE status or shut down one or both units. ITS 3.7.6 Required Action A.1 requires the verification of an available backup water supply within 4 hours and once per 12 hours thereafter and Required Action A.2 requires the CST to be restored to OPERABLE status within 7 days. This changes the CTS by extending the Completion Time in the CTS 3.7.1.3 ACTION to restore the CST to OPERABLE status from 4 hours to 7 days provided the backup water	3.7.6 Required Action A.1 Required Action A.2	3.7.1.3 Actions	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.6 L01 (continued)	supply is verified available within 4 hours and every 12 hours thereafter. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.			
3.7.7 L01	CTS 3.7.2 states that the Component Cooling Water System (CCW) shall be OPERABLE with: a. Three CCW pumps, and b. Two CCW heat exchangers. In addition, CTS 3.7.2 Action a. requires that with only two CCW pumps with independent power supplies OPERABLE to restore the inoperable CCW pump to OPERABLE status within 30 days. ITS 3.7.7 states that two CCW trains shall be OPERABLE. This changes the CTS by reducing the number of CCW pumps required to be OPERABLE from three to two and eliminating the associated action requirement to restore a single CCW pump to OPERABLE status within 30 days. This change is designated as less restrictive because less stringent LCO requirements and actions are being applied in the ITS than were applied in the CTS.	3.7.7	3.7.2 Action a	1
3.7.7 L02	CTS 3.7.2, ACTION b identifies a degraded condition of the CCW system and provides specific Completion Times to restore the degraded condition or commence a unit shutdown. If a unit shutdown is required, CTS 3.7.2 Action b requires the unit be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. ITS 3.7.7 ACTION B, similarly, states that if the Required Action and associated Completion Time of Condition A not met, to be in MODE 3 in 6 hours and MODE 4 in 12 hours and is modified by a Note stating that LCO 3.0.4.a is not applicable when entering MODE 4. This changes the CTS by permitting a Required Action end state of HOT SHUTDOWN (MODE 4) rather that an end state of COLD SHUTDOWN (MODE 5).	3.7.7 ACTION C	3.7.2, Actions b and c	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.7 L02 (continued)	This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.			
3.7.7 L03	CTS 4.7.2.c.1 requires verification that each automatic valve servicing safety-related equipment actuates to its correct position on a safety injection (SI) test signal. ITS SR 3.7.7.2 requires verification that each CCW automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal. This changes the CTS by not requiring automatic valves that are locked, sealed, or otherwise secured in position to be tested to verify that they automatically actuate to their correct position. This change is designated as less restrictive because less stringent SRs are being applied in the ITS than were applied in the CTS.	SR 3.7.7.2	4.7.2.c.1	6
3.7.7 L04	CTS 4.7.2.c.1 and CTS 4.7.2.c.2 require verifying that each automatic valve servicing safety-related equipment and each CCW system pump starts automatically on a SI test signal. ITS SR 3.7.7.2 and ITS SR 3.7.7.3 specify that the signal may be from either an "actual" or simulated (i.e., test) signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test. This change is designated as less restrictive because less stringent SRs are being applied in the ITS than were applied in the CTS.	SR 3.7.7.2 SR 3.7.7.3	4.7.2.c.1 4.7.2.c.2	6

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.7 L05	CTS 4.7.2.c requires testing of specified CCW equipment in accordance with the Surveillance Frequency Control Program "during shutdown." ITS SRs 3.7.7.2 and 3.7.7.3 do not contain a MODE restriction related to when this testing may be performed. This changes the CTS by removing the restriction on surveillance performance during specific MODES. The proposed change is designated as less restrictive because the Surveillance may be performed during plant conditions other than shutdown.	SR 3.7.7.2 SR 3.7.7.3	4.7.2.c	8
3.7.8 L01	CTS 3.7.3 states that the Intake Cooling Water System (ICW) shall be OPERABLE with: a. Three ICW pumps, and b. Two ICW headers. In addition, CTS 3.7.3 Action a. requires that with only two ICW pumps with independent power supplies OPERABLE to restore the inoperable ICW pump to OPERABLE status within 14 days. ITS 3.7.7 states that two ICW trains shall be OPERABLE. This changes the CTS by reducing the number of ICW pumps required to be OPERABLE from three to two. This change is designated as less restrictive because less stringent LCO requirements are being applied in the ITS than were applied in the CTS.	3.7.7	3.7.3 Action a	1
3.7.8 L02	CTS 3.7.3, ACTIONS b and c, identify degraded conditions of the ICW system and provide specific Completion Times to restore the degraded condition or commence a unit shutdown. If a unit shutdown is required, each CTS 3.7.3 Action b and c require the unit be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. ITS 3.7.8 ACTION B states that if the Required Action and associated Completion Time of ICW degraded conditions are not met to be in MODE 3 in 6 hours and MODE 4 in 12 hours and is modified by a Note stating that LCO 3.0.4.a is not applicable when entering MODE 4. This changes the CTS by allowing a Required	3.7.8 ACTION B	3.7.3, Actions b and c	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.8 L02 (continued)	Action end state of HOT SHUTDOWN (MODE 4) rather than an end state of COLD SHUTDOWN (MODE 5). This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.			
3.7.8 L03	CTS 4.7.3.b.1 requires verification that each automatic valve servicing safety-related equipment actuates to its correct position on a safety injection (SI) test signal. ITS SR 3.7.8.2 requires verification that each ICW System automatic valve servicing safety-related equipment that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal. This changes the CTS by exempting automatic valves that are locked, sealed, or otherwise secured in position from being tested to verify that they automatically actuate to their correct position. This change is designated as less restrictive because less stringent SRs are being applied in the ITS than were applied in the CTS.	SR 3.7.8.2	4.7.3.b.1	6
3.7.8 L04	CTS 4.7.3.b.1 and CTS 4.7.3.b.2 require verifying that each automatic valve servicing safety-related equipment and each ICW system pump starts automatically on a SI test signal. ITS SR 3.7.8.2 and ITS SR 3.7.8.3 specify that the signal may be from either an "actual" or simulated (i.e., test) signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test. This change is designated as less restrictive because less stringent SRs are being applied in the ITS than were applied in the CTS.	SR 3.7.8.2 SR 3.7.8.3	4.7.3.b.1 4.7.3.b.2	6

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.9 L01	CTS 3.7.4, Action, identifies a degraded condition of the Ultimate Heat Sink (UHS) and provides specific Completion Times to restore the degraded condition or commence a unit shutdown. If a unit shutdown is required, the CTS 3.7.4 Action requires the unit be in HOT STANDBY within the next 12 hours and in COLD SHUTDOWN within the following 30 hours. ITS 3.7.9, ACTION A, requires that with the UHS inoperable and a dual unit shutdown is not required, to be in MODE 3 in 6 hours and MODE 4 in 12 hours and is modified by a Note stating that LCO 3.0.4.a is not applicable when entering MODE 4. ITS 3.7.9, ACTION B, is applicable when the UHS is inoperable and a dual unit shutdown is required and requires both units to be in MODE 3 in 12 hours and MODE 4 in 18 hours and is modified by a Note stating that LCO 3.0.4.a is not applicable when entering MODE 4. This changes the CTS by allowing a Required Action end state of HOT SHUTDOWN (MODE 4) rather than an end state of COLD SHUTDOWN (MODE 5). This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.7.9 ACTION A and Note ACTION B and Note Required Action B.2 Note	3.7.4 Action	4
3.7.10 L01	CTS 3.7.5 ACTIONS identify degraded conditions of the CREVS and provides specific completion times to restore the degraded conditions or commence a unit shutdown. If a unit shutdown is required, CTS 3.7.5 ACTIONS require the unit be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. ITS 3.7.10, ACTION D (associated with single unit shutdown), states that if the Required Action and associated Completion Time associated with the CREVS degraded conditions are not met to be in MODE 3 in 6 hours and MODE 4 in 12 hours and is modified by a Note stating that LCO 3.0.4.a is not applicable when entering MODE 4. ITS 3.7.10, ACTION E (associated with a dual unit shutdown), states that if the Required Action and associated Completion Time	3.7.10 Condition D Note Condition E Note Required Action D.2 and Note Required Action E.2 and Note	3.7.5 Action a.1, a.3, b	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.10 L01 (continued)	associated with the CREVS degraded conditions are not met to be in MODE 3 in 12 hours and MODE 4 in 18 hours and is modified by a Note stating that LCO 3.0.4.a is not applicable when entering MODE 4. This changes the CTS by allowing a Required Action end state of HOT SHUTDOWN (MODE 4) rather than an end state of COLD SHUTDOWN (MODE 5). This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.			
3.7.10 L02	CTS 3.7.5, ACTIONS a.5, contains Action for when two recirculation dampers are inoperable. The ACTION requires placing the compensatory filtration unit in service and suspending the movement of irradiated fuel. ITS 3.7.10 ACTIONS do not include specific actions for an inoperable CREVS damper. This changes the CTS by removing specific action to placing the compensatory filtration unit in service and suspending the movement of irradiated fuel when two recirculation dampers are inoperable provided the CREVS safety function can be performed. This change is designated as less restrictive because removal of the CTS action allows one or more CREVS dampers to be inoperable provided the CREVS safety function can be performed.	3.7.10 ACTIONS	3.7.5, Actions a.5	4
3.7.10 L03	CTS 4.7.5.e requires verification that on a containment isolation signal the system automatically isolates the control room and switches into a recirculation mode of operation. ITS SR 3.7.10.3 specifies that the signal may be either an “actual” or “simulated” actuation signal. This changes the CTS by allowing the use of either an actual or a simulated signal for the test. This change is designated as less restrictive because less stringent SRs are being applied in the ITS than were applied in the CTS.	SR 3.7.10.3	4.7.5.e	6

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.10 L04	CTS 4.7.5.e requires verification that on a containment isolation signal the system automatically isolates the control room and switches into a recirculation mode of operation. ITS SR 3.7.10.3 requires verification that each CREVS train actuates and additionally states, except for dampers and valves that are locked, sealed, or otherwise secured in the actuated position. This changes the CTS by not requiring dampers and valves locked, sealed, or otherwise secured in position to be tested. This change is designated as less restrictive because less stringent SRs are being applied in the ITS than were applied in the CTS.	SR 3.7.10.3	4.7.5.e	6
3.7.10 L05	CTS 3.7.5 Action a.4, one recirculation damper inoperable; a.6, an inoperable damper in the normal outside air intake; a.7, an inoperable damper in the emergency outside air intake provide actions when a required damper is inoperable. ITS 3.7.10 ACTIONS do not include specific actions for inoperable required dampers. This changes the CTS by removing specific action requirements associated with an inoperable damper in the CREVS. This change is designated as less restrictive because removal of the CTS actions allows restoration of the damper's capability to be controlled by other ITS 3.7.10 actions, which are less restrictive and allows more than one isolation damper per air duct to be inoperable provided the safety related function is performed.	3.7.10 ACTIONS G and F	3.7.5 Action a.4, a.6, a.7	4
3.7.10 L06	CTS 3.7.5, Actions a.1 and a.3, require the suspension of the movement of irradiated fuel assemblies immediately if required AHUs or recirculation fans are not restored to OPERABLE status within 7 days. ITS 3.7.10, Required Actions F.1.1 and F.1.2, permit placing the control room in the recirculation mode of operation with at least two AHUs operating as an option to suspending the movement of irradiated fuel (ITS 3.7.10, Required Action F.2). This changes the CTS by providing optional action requirements when required AHUs or	3.7.10, Required Actions F.1.1 and F.1.2	3.7.5, Actions a.1 and a.3	4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.10 L06 (continued)	recirculation fans are not restored to OPERABLE status within 7 days during operation in MODES 5 or 6, or during the movement of irradiated fuel assemblies. This change is designated as less restrictive because optional actions are proposed in lieu of the CTS actions.			
3.7.11 L01	CTS 3.7.5, ACTION a.2, identifies a degraded condition of the CREATCS and provides specific completion times to restore the degraded condition or commence a unit shutdown. If a unit shutdown is required, CTS 3.7.5, ACTION a.2, requires the unit be in HOT STANDBY within the next 6 hours (12 hours if a dual unit shutdown) and in COLD SHUTDOWN within the following 30 hours. ITS 3.7.11 ACTION B states that if the Required Action and associated Completion Time of CREATCS degraded conditions are not met to be in MODE 3 in 6 hours and MODE 4 in 12 hours and is modified by a Note stating that LCO 3.0.4.a is not applicable when entering MODE 4. ITS 3.7.11, ACTION C, states that if the Required Action and associated Completion Time of CREATCS degraded conditions are not met to be in MODE 3 in 12 hours and MODE 4 in 18 hours and is modified by a Note stating that LCO 3.0.4.a is not applicable when entering MODE 4. This changes the CTS by allowing a Required Action end state of HOT SHUTDOWN (MODE 4) rather than an end state of COLD SHUTDOWN (MODE 5). This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.7.11 Condition B Note Condition C Note Required Action B.2 and Note Required Action C.2 and Note	3.7.5, Action a.2	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.11 L02	ISTS 3.7.11, Required Action C.1 (ITS 3.7.11, Required Action D.1), provides an option of placing the OPERABLE CREATCS train in service in lieu of suspending the movement of irradiated fuel assemblies when one CREATCS train is inoperable in MODES 5 or 6, or during the movement of irradiated fuel assemblies. CTS 3.7.5, ACTION a.2, does not include this option. This changes the CTS by explicitly providing an optional Action to be taken when one CREATCS train is inoperable in MODES 5 or 6, or during the movement of irradiated fuel assemblies. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS	3.7.11, Required Action D.1	3.7.5 Action a.2	4
3.7.12 L01	CTS 3.9.11 Applicability states "Whenever irradiated fuel assemblies are in the spent fuel pool." CTS Surveillance Requirement (SR) 4.9.11 also contains a statement that it is required to be performed when, "irradiated fuel assemblies are in the fuel storage pool." CTS ACTION a requires suspension of "movement of fuel assemblies" when the LCO is not satisfied. ITS 3.7.12 LCO is applicable "During movement of irradiated fuel assemblies in the spent fuel pool." In addition, ITS ACTION A requires the suspension of "movement of irradiated fuel assemblies" when the minimum water level requirements cannot be met. This changes the CTS by relaxing the Applicability and performance of the SR to only during movement of irradiated fuel assemblies, as well as relaxing the Action to suspending movement of irradiated fuel assemblies. These changes are consistent with the assumptions of the fuel handling accident analysis. This change is designated as less restrictive because less stringent TS requirements are allowed in the ITS than are allowed in the CTS.	3.7.12 Applicability ACTION A SR 3.7.12.1	3.9.11 Applicability Action a 4.9.11	2

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.12 L02	CTS 3.9.11 ACTION a states, in part, that when the spent fuel pool water level is not met, suspend all crane operations with loads in the fuel storage areas. ITS 3.7.12 Required Action A.1 states that when spent fuel pool water level is not within limits, immediately suspend movement of irradiated fuel assemblies in the spent fuel pool. This changes the CTS by deleting the requirements to suspend crane operations over the spent fuel storage areas. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.7.12 Required Action A.1	3.9.11 Action a	4
3.7.13 L01	CTS 3.9.14 LCO a states "The minimum boron concentration in the fuel storage pool shall be 2300 ppm." CTS 3.9.14 ACTION a states "With boron concentration in the fuel storage pool less than 2300 ppm, suspend movement of spent fuel in the fuel storage pool and initiate action to restore boron concentration to 2300 ppm or greater." ITS 3.7.13 requires that the fuel pool boron concentration shall be ≥ 2300 ppm when fuel assemblies are stored in the fuel pool and a fuel pool verification has not been performed since the last movement of fuel assemblies in the spent fuel pool. Additionally, a new Required Action (Required Action A.2.2) has been added to allow the initiation of an action to perform a fuel pool verification as an option to initiating an action to restore fuel pool boron concentration to within limit. This changes the CTS by changing the Applicability and by adding an option for restoring the fuel pool boron concentration to within its limit. This change is designated as less restrictive because the LCO requirements in the ITS are more relaxed than the requirements in the CTS.	3.7.13 Applicability Required Action A.2.2	3.9.14 Applicability Action a	2

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
Refer to DOC section in ML23151A451	**Section 3.8, Electrical Power Systems**			
3.8.1 L01	CTS 3.8.1.1 Action a provides actions when the unit startup transformer or associated circuit is inoperable. CTS Actions a.3 and a.5 provide different actions based on the unit's MODE. If the inoperability is associated with the unit's circuit and the unit is in MODE 1 CTS allows 72 hours to restore the inoperable circuit or in accordance with the RICT Program. If the inoperability is associated with the unit's circuit and the unit is in MODE 2, 3, or 4, CTS allows 24 hours to restore the inoperable circuit or in accordance with the RICT Program. ITS 3.8.1 provides one ACTION for an inoperable circuit if it is associated with the unit and is not dependent on the applicable operational MODE. ITS 3.8.1 Required Action A.3 requires that with one-unit offsite circuit inoperable to restore the offsite circuit to OPERABLE status within 72 hours or in accordance with the RICT Program. This changes the baseline Completion Time in the CTS actions for an inoperable unit's startup transformer and associated circuit when in MODE 2, 3, or 4 from 24 hours to 72 hours. This change is designated as less restrictive because the time to restore required electrical equipment to OPERABLE status in the CTS has been extended in the ITS.	3.8.1	3.8.1.1 Action a	3

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.1 L02	CTS 3.8.1.1, ACTIONs a.3.b, a.4, a.5, b.3, d.1, e.2, f, and CTS 3.8.2.1 Action a, in part, require that if the associated Action and Completion Time are not met to be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours; or in at least HOT STANDBY within the next 12 hours and in COLD SHUTDOWN within the following 30 hours. ITS 3.8.1, ACTION I, requires that with the Required Action and associated Completion Time of Condition A, B, C, D, E, F, G or H not met to be in MODE 3 in 6 hours and MODE 4 in 12 hours. ITS 3.8.1, ACTION J requires that with the Required Action and associated Completion Time of Condition A, B, C, D, E, F, G or H not met to be in MODE 3 in 12 hours and MODE 4 in 18 hours. This changes the CTS by requiring a less restrictive end state in the required actions, MODE 4 (HOT SHUTDOWN) instead of MODE 5 (COLD SHUTDOWN). This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.8.1 ACTION I ACTION J	3.8.1.1 Action a.3.b Action a.4 Action a.5 Action b.3 Action d.1 Action e.2 Action f 3.8.2.1 Action a	4
3.8.1 L03	CTS 3.8.1, ACTION b.2, states, in part, that with one of the required EDGs inoperable and testing of remaining required EDGs is required to determine any potential common mode failure for the remaining EDGs, this testing must be performed regardless of when the inoperable EDG is restored to OPERABILITY. ITS 3.8.1, ACTION C, requires a determination that the OPERABLE EDGs are not inoperable due to a common cause failure or similarly performance of a test; however, this test is not required to be performed when the inoperable EDG is restored to OPERABILITY within 24 hours. This changes the CTS by not requiring a CTS Action to be performed. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.8.1 ACTION C	3.8.1 Action b.2	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.1 L04	CTS 3.8.1.1, ACTION c.2, specifies the compensatory actions for one inoperable startup transformer and one inoperable EDG. The Actions includes a requirement to demonstrate the OPERABILITY of the remaining OPERABLE EDG by performing SR 4.8.1.1.2.a.4 within 8 hours. ITS 3.8.1, Required Action C.3.2, allows 24 hours to perform a similar check on the remaining OPERABLE EDGs. This changes the CTS by extending the time to perform this check from 8 hours to 24 hours. This change is designated as less restrictive because more time will be allowed to complete a Required Action in the ITS than is allowed in the CTS.	3.8.1 Required Action C.3.2	3.8.1.1 Action c.2	3
3.8.1 L05	CTS SR 4.8.1.1.c.2 provides required actions to demonstrate that OPERABILITY of the remaining EDGs unless it can be confirmed that the cause of the inoperable EDG does not exist on the remaining required EDGs. In addition, CTS 3.8.1.1.c.2 states that if testing of the remaining required EDGs is required, this testing must be performed regardless of when the inoperable EDG is restored to OPERABILITY. ITS 3.8.1, ACTION C, does not include this requirement to test the remaining required EDGs regardless of when the inoperable EDG is restored to OPERABILITY. This changes the CTS by deleting a requirement to test remaining required EDG once the inoperable EDG is returned to OPERABLE. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.8.1 ACTION C	4.8.1.1.c.2	4
3.8.1 L06	Not used.	N/A	N/A	N/A

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ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.1 L07	CTS 3.8.1, ACTION d.1, states, in part, that with one EDG inoperable, within 2 hours verify all required systems, subsystems, trains, components, and devices (except SI pumps) that depend on the remaining required OPERABLE EDGs as a source of emergency power are also OPERABLE. ITS 3.8.1, Required Action C.2, states to declare required feature(s) supported by the inoperable EDG inoperable when its required redundant feature(s) is inoperable within 4 hours from discovery of Condition C concurrent with inoperability of redundant required feature(s). This changes the CTS by allowing two additional hours to restore inoperable AC sources prior to declaring the associated equipment inoperable. This change is designated as less restrictive because additional time is allowed to restore equipment to OPERABLE status.	3.8.1 Required Action C.2	3.8.1 Action d.1	3
3.8.1 L08	CTS 3.8.1.1, ACTION e.2, states that with two startup transformers or the associated circuits inoperable to restore at least one of the inoperable startup transformers to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours* and in COLD SHUTDOWN within the following 30 hours. The footnote associated with the asterisk following "6 hours" states that if the opposite unit is shutdown first, this time can be extended to 42 hours, thus changing the time to be in HOT STANDBY from 6 hours to 42 hours and the time to be in COLD SHUTDOWN from 36 hours to 72 hours. ITS 3.8.1, ACTION J, reduces the possible 42-hour CTS extension to 12 hours and the final end-state to MODE 4, changing the time required to be in HOT STANDBY (MODE 3) from 6 hours, or possibly 42 hours, to 12 hours and the time to be in COLD SHUTDOWN (MODE 5) from 36 hours, or possibly 72 hours, to MODE 4 (HOT SHUTDOWN) in 18 hours. This changes the CTS by requiring a less restrictive end state in the required actions, MODE 4 (HOT SHUTDOWN) instead of MODE 5 (COLD SHUTDOWN) and includes 12 hours to be in MODE 3 instead of 6 hours.	3.8.1 ACTION J	3.8.1.1 Action e.2	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.1 L08 (continued)	This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.			
3.8.1 L09	CTS 3.8.1.1, ACTION f, states, in part, that with two of the above required EDGs inoperable to restore at least one of the inoperable EDGs to OPERABLE status within 2 hours. ITS 3.8.1, ACTION G, states that with two or more required EDGs inoperable, to restore all but one required EDG to OPERABLE status within 2 hours. This changes the CTS by allowing continued operation with more than two inoperable EDGs, preventing premature entry into LCO 3.0.3. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.8.1 ACTION G	3.8.1.1 Action f	4
3.8.1 L10	CTS SR 4.8.1.1.1.b contains a requirement to manually transfer unit power supply from the auxiliary transformer to the startup transformer “while shutting down.” This test has been incorporated in ITS SR 3.8.1.7. ITS SR 3.8.1.7 does not specify conduct of the test to occur while shutting down. This changes the CTS by deleting the requirement to perform the Surveillance while shutting down. This change is designated as less restrictive because the Surveillance may be performed during plant conditions other than while shutting down.	SR 3.8.1.7	4.8.1.1.1.b	8
3.8.1 L11	CTS SR 4.8.1.1.2.c requires the removal of accumulated water from the day tank and skid-mounted fuel tanks (Unit 4-day tank only) in accordance with the Surveillance Frequency Control Program (SFCP) “and after each operation of the diesel where the period of operation was greater than or equal to 1 hour.” ITS SR 3.8.1.4, which requires the same Surveillance to be performed, does not include the conditional Frequency. This changes the CTS by deleting the	SR 3.8.1.4	4.8.1.1.2.c	7

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.1 L11 (continued)	requirement to check for and remove accumulated water after each occasion when the EDG is operated for an hour or more. This change is designated as less restrictive because the explicit requirement to remove accumulated water in the day tank and Unit 3 skid mounted tank after an EDG run of greater than 1 hour has been deleted.			
3.8.1 L12	CTS SR 4.8.1.1.2.g contains requirements to perform various tests "during shutdown." These tests have been incorporated into ITS SR 3.8.1.8, SR 3.8.1.9, SR 3.8.1.10, SR 3.8.1.11, SR 3.8.1.12, SR 3.8.1.15, SR 3.8.1.16, SR 3.8.1.17, and SR 3.8.1.18 in Notes. ITS SR 3.8.1.10, SR 3.8.1.15, SR 3.8.1.16, SR 3.8.1.17, and SR 3.8.1.18 Notes state that the Surveillance shall not normally be performed in MODE 1, 2, 3, or 4. ITS SR 3.8.1.8, SR 3.8.1.9, SR 3.8.1.11, and SR 3.8.1.12 Notes state that the Surveillance shall not normally be performed in MODE 1 or 2. The Notes also state that portions of the Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced, further stating that credit may be taken for unplanned events that satisfy this SR. Additionally, a clarifying statement from CTS is added to the ITS Notes stating that these MODE restrictions are applicable only to the two EDGs associated with the unit. This changes the CTS by replacing the requirement to perform the Surveillances during shutdown (MODES 4, 5, 6, or Defueled) with a Note stating when the Surveillances are not normally performed (either MODES 1 or 2; or MODES 1, 2, 3, or 4) and allowing the test to be performed in these MODES as long as the associated assessment is performed or provided that an unplanned event satisfies the requirements of the Surveillance.	SR 3.8.1.8, SR 3.8.1.9, SR 3.8.1.10, SR 3.8.1.11, SR 3.8.1.12, SR 3.8.1.15, SR 3.8.1.16, SR 3.8.1.17, and SR 3.8.1.18 Notes	4.8.1.1.2.g	8

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.1 L12 (continued)	This change is designated as less restrictive because the Surveillances may be performed during plant conditions other than shutdown.			
3.8.1 L13	CTS SR 4.8.1.1.2.g.4 requires verification of EDG performance following a “simulated” loss of offsite power. CTS SR 4.8.1.1.2.g.5 requires verification of EDG performance following an ESF actuation “test” signal. CTS SR 4.8.1.1.2.g.6.a, b, and c require verification of EDG performance following a “simulated” loss of offsite power in conjunction with an ESF actuation “test” signal. CTS R 4.8.1.1.2.g.10 requires verification of EDG test mode override following a simulated SI signal. ITS SR 3.8.1.10, SR 3.8.1.11, SR 3.8.1.12, SR 3.8.1.16, and SR 3.8.1.18 specify that the signal may be either an “actual or simulated” signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test. This change is designated as less restrictive because less stringent SRs are being applied in the ITS than were applied in the CTS.	SR 3.8.1.10, SR 3.8.1.11, SR 3.8.1.12, SR 3.8.1.16, and SR 3.8.1.18	4.8.1.1.2.g.4 4.8.1.1.2.g.5 4.8.1.1.2.g.6.a, b, c 4.8.1.1.2.g.10	6
3.8.1 L14	CTS SR 4.8.1.1.2.g.7 requires verification that each EDG can operate for at least 24 hours, with loading at the 2-hour rating during the first 2 hours and at a load equivalent of the continuous duty rating during the remaining hours of the test. The CTS further requires that the generator voltage and frequency shall be 39504350 volts and 60 ± 0.6 Hz within 15 seconds after the start signal and that the steady-state generator voltage and frequency shall be maintained within these limits during this test. ITS SR 3.8.1.13 requires a similar test; however, it does not specify that the generator voltage and frequency shall be 39504350 volts and 60 ± 0.6 Hz within 15 seconds after the start signal. This changes the CTS by removing the timed voltage and frequency limits for the initial start of the EDG.	SR 3.8.1.13	4.8.1.1.2.g.7	6

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.1 L14 (continued)	This change is designated as less restrictive because less stringent SRs are being applied in the ITS than were applied in the CTS.			
3.8.1 L15	CTS SR 4.8.1.1.2.g.7 states, in part, that within 5 minutes after completing the 24hour test to verify the EDG starts and accelerates to reach a generator voltage and frequency of 3950-4350 volts and 60 ± 0.6 Hz within 15 seconds after the start signal.** Footnote ** modifies this requirement by stating that if verification of the EDG's ability to restart and accelerate to a generator voltage and frequency of 3950-4350 volts and 60 ± 0.6 Hz within 15 seconds following the 24-hour operation test of CTS SR 4.8.1.1.2.g.7 is not satisfactorily completed, it is not necessary to repeat the 24-hour test. Instead, the EDG may be operated between 2300-2500 kW Unit 3, (2650-2850 kW Unit 4) for 2 hours or until operating temperature has stabilized (whichever is greater). ITS SR 3.8.1.14 similarly requires verification that each EDG starts and achieves within 15 seconds voltage ≥ 3950 volts and frequency ≥ 59.4 Hz and a steady state voltage ≥ 3950 volts and ≤ 4350 volts with a frequency ≥ 59.4 Hz and ≤ 60.6. This SR is modified by a Note stating that this Surveillance shall be performed within 5 minutes of shutting down the EDG after the EDG has operated for ≥ 2 hours loaded. This changes the CTS by not requiring the performance of the 24-hour test but only a 2-hour loaded pre-test EDG operation prior to verifying the EDG's ability to start within 15 seconds. This change is designated as less restrictive because less stringent SRs are being applied in the ITS than were applied in the CTS.	SR 3.8.1.14	4.8.1.1.2.g.7	6
3.8.1 L16	CTS SR 4.8.1.1.2.g.8 requires verification that the auto-connected loads to each EDG do not exceed 2500 kW (Unit 3), 2874 kW (Unit 4). ITS 3.8.1 does not require the verification of this loading limit to ensure	None	4.8.1.1.2.g.8	5

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.1 L16 (continued)	OPERABILITY of the EDGs. This changes the CTS by deleting the SR. This change is designated as less restrictive because a Surveillance which is required in the CTS will not be required in the ITS.			
3.8.1 L17	CTS SR 4.8.1.1.2.g.13 requires verifying that the EDG lockout relay prevents the EDG from starting. ITS 3.8.1 Surveillances do not include this SR. This changes the CTS by deleting the SR to verify that the EDG lockout relay prevents the EDG from starting. This change is designated as less restrictive because Surveillances which are required in the CTS will not be required in the ITS.	None	4.8.1.1.2.g.13	5
3.8.1 L18	CTS SR 4.8.1.1.2.h requires verification that the EDGs achieve the specified voltage and frequency within 15 seconds when started simultaneously in accordance with the SFCP or after any modifications which could affect EDG interdependence. ITS SR 3.8.1.19 does not include the requirement to test simultaneous start of the EDGs after any modifications which could affect EDG interdependence. This changes the CTS by deleting the requirement to simultaneously start the EDGs after any modifications which could affect EDG interdependence. This change is designated as less restrictive because Surveillances which are required in the CTS will not be required in the ITS.	None	4.8.1.1.2.h	5
3.8.1 L19	CTS SR 4.8.1.1.2.g.5, CTS SR 4.8.1.1.2.g.7, and CTS SR 4.8.1.1.2.h require, in part, that when starting the EDG the generator voltage and frequency be 3950-4350 volts and 60 ± 0.6 Hz within 15 seconds after the start signal. ITS SR 3.8.1.11, ITS SR 3.8.1.14, and ITS SR 3.8.1.19, in part, requires verification that each EDG starts from standby conditions and achieves a voltage of ≥ 3950 V and frequency	SR 3.8.1.11 SR 3.8.1.14 SR 3.8.1.19	4.8.1.1.2.g.5 4.8.1.1.2.g.7 4.8.1.1.2.h	6

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.1 L19 (continued)	≥ 59.4 Hz within 15 seconds and requires a steady state voltage and frequency of ≥ 3950 V and ≤ 4350 V and ≥ 59.4 Hz and ≤ 60.6 Hz. This changes CTS by replacing the voltage and frequency band requirement during the starting of an EDG with minimum values until steady state conditions are reached. This change is designated as less restrictive because less stringent Surveillance test criteria are being applied in the ITS than were applied in the CTS.			
3.8.2 L01	CTS 3.8.1.2 ACTION requires, in part, that with less than the minimum required AC electrical power sources OPERABLE, within 8 hours, depressurize and vent the RCS through a greater than or equal to 2.2 square inch vent. In addition, when in MODE 5 with the reactor coolant loops not filled, or in MODE 6 with the water level less than 23 feet above the reactor vessel flange, increase RCS inventory as soon as possible. ISTS 3.8.2 does not include this Required Action. ITS LCO 3.4.12, "Low Temperature Overpressure Protection (LTOP) System," provides requirements for RCS pressure relief when in MODES 4, 5, or 6, with limitations including a Required Action to depressurize and establish an RCS vent of ≥ 2.2 square inches within 12 hours if the other pressure relief methods are incapable of limiting pressure. This changes the CTS by relying on ITS LCO 3.4.12 to provide the Required Actions and allowing a longer Completion Time to depressurize the RCS and establish a ≥ 2.2 square inch RCS vent. This change is designated as less restrictive because additional time is allowed to restore parameters to within the LCO limits than was allowed in the CTS.	LCO 3.4.12	3.8.1.2 Action	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.2 L02	The CTS 3.8.1.2 ACTION requires the suspension of certain activities when the required AC Source is inoperable. ITS 3.8.2 provides an alternate Required Action (ITS 3.8.2, Required Action A.1) that allows the declaration of affected required feature(s) with no offsite power available inoperable instead of requiring the specified activities to be suspended. This changes the CTS by allowing the affected required feature(s) with no offsite power available to be declared inoperable instead of suspending the specified activities. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.8.2 Required Action A.1	3.8.1.2 Action	4
3.8.2 L03	CTS 4.8.1.2 requires the AC electrical power sources to be demonstrated OPERABLE by the performance of each of the Surveillance Requirements (SRs) of 4.8.1.1.1.a and 4.8.1.1.2 (except for Specification 4.8.1.1.2a.5). ITS SR 3.8.2.1 has included a similar allowance in the Note to SR 3.8.2.1; however, additional ITS SRs are exempt from being required to be performed. ITS SR 3.8.2.1 Note states the following SRs are not required to be performed: SR 3.8.1.3, SR 3.8.1.9 through SR 3.8.1.11, SR 3.8.1.13 through SR 3.8.1.16, and SR 3.8.1.18. ITS 3.8.1.3 is CTS 4.8.1.1.2a.5. This changes the CTS by not requiring the performance of CTS 4.8.1.1.2g.2 (ITS SR 3.8.1.9), CTS 4.8.1.1.2g.3 (ITS SR 3.8.1.10), CTS 4.8.1.1.2g.4 (ITS SR 3.8.1.11), CTS 4.8.1.1.2g.6)c (ITS SR 3.8.1.13), CTS 4.8.1.1.2g.7 (ITS SR 3.8.1.14), CTS 4.8.1.1.2g.7 (ITS SR 3.8.1.15), CTS 4.8.1.1.2g.9 (ITS SR 3.8.1.16), and CTS 4.8.1.1.2g.12 (ITS SR 3.8.1.18). This change is designated as less restrictive because Surveillances will be performed less frequently under the ITS than under the CTS.	SR 3.8.2.1	4.8.1.2	6

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.2 L04	CTS 4.8.1.2 requires the AC electrical power sources to be demonstrated OPERABLE by the performance of SRs 4.8.1.1.1.a and 4.8.1.1.2 (except for Specification 4.8.1.1.2a.5). ITS SR 3.8.2.1 is exempting additional SRs, providing a list of SRs that are not applicable. ITS SR 3.8.2.1 states that for AC sources required to be OPERABLE, the SRs of Specification 3.8.1, "AC Sources – Operating," except SR 3.8.1.8, SR 3.8.1.12, SR 3.8.1.17, SR 3.8.1.19, and SR 3.8.1.20, are applicable. This changes the CTS by not requiring CTS 4.8.1.1.1.b (ITS SR 3.8.1.8), CTS 4.8.1.1.2g.5) (ITS SR 3.8.1.12), CTS 4.8.1.1.2g.10) (ITS SR 3.8.1.17), CTS 4.8.1.1.2g.6).a and b (ITS SR 3.8.1.19), and CTS 4.8.1.1.2h (ITS SR 3.8.1.20) to be met. This change is designated as less restrictive because Surveillances that are required in CTS will not be required in the ITS.	SR 3.8.2.1	4.8.1.2	5
3.8.2 L05	The CTS 3.8.1.2 ACTION specifies the compensatory action for an inoperable required AC Source while in MODES 5 and 6. One of the compensatory actions is the suspension of CORE ALTERATIONS. Under similar conditions, ITS 3.8.2 does not require suspension of CORE ALTERATIONS. This changes the CTS by deleting the requirement to suspend CORE ALTERATIONS when a required AC source is inoperable. This change is designated as less restrictive because Required Actions that are required in CTS will not be required in the ITS.	3.8.2	3.8.1.2 Action	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.3 L01	CTS 3.8.1.1 and CTS 3.8.1.2 do not provide compensatory actions if the volume of fuel oil in a storage tank is less than the specified limit. Thus, if the minimum required volume is not met, the associated EDG must be declared inoperable and the actions of CTS 3.8.1.1 or CTS 3.8.1.2 must be entered, as appropriate. ITS 3.8.3, ACTION A, allows a delay in declaring the associated EDG inoperable as long as the volume of stored fuel oil is greater than a six-day supply. ITS 3.8.3, Required Action A.1, allows 48 hours to restore the fuel oil volume to within limits. As stated in the ACTIONS Note, a separate entry into the ACTION is allowed for each EDG. If the Required Action and associated Completion Time are not met or if the fuel oil storage tank volume is less than a 6-day supply, the associated EDG must be declared inoperable immediately, as required by ITS 3.8.3, ACTION F. This changes the CTS by allowing the EDGs to not be declared inoperable with the fuel oil 7-day storage tank volume not within the specified Surveillance limit as long as the associated EDG has a 6-day supply of fuel oil in the storage tank. This change is designated as less restrictive because less stringent Required Actions are being applied in ITS than in CTS.	3.8.3, ACTION A 3.8.3, Required Action A.1 3.8.3, ACTION F	3.8.1.1 3.8.1.2	4
3.8.4 L01	CTS 3.8.2.1 states that the following DC electrical sources shall be OPERABLE and lists: a. 125-volt DC Battery Bank 3A or spare battery bank D-52 and associated full capacity charger(s); b. 125-volt DC Battery Bank 3B or spare battery bank D-52 and associated full capacity charger(s); c. 125-volt DC Battery Bank 4A or spare battery bank D-52 and associated full capacity charger(s); and d. 125-volt DC Battery Bank 4B or spare battery bank D-52 and associated full capacity charger(s). Under each DC battery bank and associated charger(s) listing are the associated chargers, identification of the charger's power supply by MCC, and the emergency diesel generator that would provide power to that MCC if needed. In addition, CTS 3.8.2.1, Action b Footnote *, in part, states that each remaining required battery charger is capable of being powered from its	LCO 3.8.4	3.8.2.1	1

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.4 L01 (continued)	associated diesel generator. ITS 3.8.4 states that four DC electrical power trains shall be OPERABLE and only provides Required Actions for inoperable required battery chargers. This changes the CTS by deleting specific charger power supply requirements in the LCO and Actions if these requirements are not met. This change is designated as less restrictive because less stringent LCO requirements are being applied in the ITS than were applied in the CTS.			
3.8.4 L02	CTS 3.8.2.1, ACTION b, states, in part, that with none of the full-capacity chargers associated with a battery bank OPERABLE, restore and at least one charger associated with each battery bank to OPERABLE status within two hours or commence a unit shutdown. ITS 3.8.4, ACTION A, has been added to provide Actions for the condition with one required battery chargers inoperable. ITS 3.8.4, Required Action A.1, requires the restoration of the battery terminal voltage to greater than or equal to the minimum established float voltage within 2 hours. ITS 3.8.4, Required Action A.2, requires the verification that the battery float current is ≤ 2 amps once per 12 hours. ITS 3.8.4, Required Action A.3, requires the restoration of the battery chargers to OPERABLE status within 72 hours. This changes the CTS by extending the time a required battery charger may be inoperable. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.8.4, ACTION A	3.8.2.1, Action b	3

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.4 L03	CTS 3.8.2.1, ACTION b, states, in part, that when the required actions of ACTION b are not met within the time specified that the units must be placed in at least HOT STANDBY within the next 12 hours and in COLD SHUTDOWN within the following 30 hours. ITS 3.8.4, ACTION D, states that with Required Actions and associated Completion Times of the identified Conditions of inoperability not met, to be in MODE 3 within 12 hours and MODE 4 within 18 hours and includes a Note stating that LCO 3.0.4.a is not applicable when entering MODE 4. This changes the CTS by permitting a Required Action end state of HOT SHUTDOWN (MODE 4) rather that an end state of COLD SHUTDOWN (MODE 5). This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.8.4, ACTION D	3.8.2.1, Action b	4
3.8.4 L04	CTS 4.8.2.1.c.3 requires, in part, each 400-amp battery charger (associated with Battery Banks 3A and 4B) will supply at least 400 amperes at ≥ 129 volts for at least 8 hours, and each 300-amp battery charger (associated with Battery Banks 3B and 4A) will supply at least 300 amperes at ≥ 129 volts for at least 8 hours. ITS SR 3.8.4.2 includes a similar test. In addition, the SR provides an alternative test method. This test method requires verification that each battery charger can recharge the battery to the fully charge state within 24 hours while supplying the largest combined demands of the various continuous steady state loads, after a battery discharge to the bounding design basis event discharge state. This changes the CTS by allowing an alternate test method that is not currently allowed. This change is designated as less restrictive because less stringent Surveillance Requirements are being applied in the ITS than were applied in the CTS.	SR 3.8.4.2	4.8.2.1.c.3	6

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.4 L05	CTS 4.8.2.1.d requires, in part, a verification of the station battery capacity when the battery is subjected to a service test. CTS 4.8.2.1.f allows substitution of a performance discharge test in lieu of the battery service test once per 60-month interval. ITS SR 3.8.4.3 is modified by Note 1 which allows the modified performance discharge test in SR 3.8.6.6 to be performed in lieu of the service test in SR 3.8.4.3. This changes the CTS by allowing a modified performance discharge test to be substituted for a service test for any performance of the Surveillance, instead of the current once per 60 months. This change is designated as less restrictive because less stringent SRs are being applied in the ITS than were applied in the CTS.	SR 3.8.4.3	4.8.2.1.d 4.8.2.1.f	6
3.8.5 L01	CTS 3.8.2.2 ACTION states, in part, that with one or more of the required associated full-capacity chargers inoperable or not capable of being powered from an OPERABLE EDG, immediately suspend all operations involving CORE ALTERATIONS, positive reactivity changes, or movement of irradiated fuel; initiate corrective action to restore the required battery banks and associated full capacity chargers to OPERABLE status as soon as possible. ITS 3.8.5, Required Action A.1, requires the restoration of the battery terminal voltage to greater than or equal to the minimum established float voltage within 2 hours. ITS 3.8.5, Required Action A.2, requires the verification that the battery float current is ≤ 2 amps once per 12 hours. ITS 3.8.5, Required Action A.3, requires the restoration of the battery chargers to OPERABLE status within 72 hours. This changes the CTS by extending the time a required battery charger may be inoperable. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.8.5, Required Action A.1	3.8.2.2 Action	3

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.5 L02	CTS 3.8.2.2 ACTION requires that with one or more of the required 125-volt battery banks or required associated full-capacity chargers inoperable or not capable of being powered from an OPERABLE EDG, the RCS must be depressurized and vented within 8 hours through a 2.2 square inch vent. ISTS 3.8.5 does not include this Required Action. ITS LCO 3.4.12, "Overpressure Mitigation System," provides requirements for RCS pressure relief when in MODES 4, 5, or 6 to depressurize and establish an RCS vent of ≥ 2.2 square inches within 24 hours if the other pressure relief methods are incapable of limiting pressure. This changes the CTS by relying on ITS LCO 3.4.12 to provide the Required Actions and allowing a longer Completion Time to depressurize the RCS and establish a ≥ 2.2 square inch RCS vent. This change is designated as less restrictive because additional time is allowed to restore parameters to within LCO limits than was allowed in CTS.	LCO 3.4.12	3.8.2.2 Action	3
3.8.5 L03	CTS 3.8.2.2 ACTION states, in part, that with one or more of the required 125-volt battery banks or required associated full-capacity chargers inoperable or not capable of being powered from an OPERABLE EDG, immediately suspend all operations involving CORE ALTERATIONS, positive reactivity changes, or movement of irradiated fuel. ITS 3.8.5, Required Actions B.1, B.2.1, and B.2.2, provide Actions to be performed under similar conditions. These ITS Required Actions state to declare affected required feature(s) inoperable, or to suspend movement of irradiated fuel assemblies and suspend operations involving positive reactivity additions that could result in loss of required SHUTDOWN MARGIN (SDM) or boron concentration. This changes the CTS Actions by deleting the requirement to suspend CORE ALTERATIONS and to clarify to only suspend positive reactivity additions when it could result in loss of required SDM or boron concentration.	3.8.5, Required Actions B.1, B.2.1, and B.2.2,	3.8.2.2 Action	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.5 L03 (continued)	This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.			
3.8.5 L04	CTS 4.8.2.2 requires that the required 125-volt battery banks and associated full-capacity chargers be demonstrated OPERABLE in accordance with Specification 4.8.2.1. ITS Surveillance Requirement (SR) 3.8.5.1 requires SR 3.8.4.1, SR 3.8.4.2, and SR 3.8.4.3 to be applicable. However, a Note has been added that states ITS SRs 3.8.4.2 and 3.8.4.3 are not required to be performed. This changes the CTS by allowing certain SRs not to be performed. This change is designated as less restrictive because Surveillances will be performed less frequently under ITS than under CTS.	SR 3.8.5.1	4.8.2.2	5
3.8.6 L01	CTS 3.8.2.1 and CTS 3.8.2.2 provide ACTIONS and associated Completion Times for when a 125 V battery is inoperable due to battery parameters not within limits. In addition, CTS Table 4.8-2 provides in the form of Notes (1), (2), and (3), ACTIONS and associated Completions Times when Category A or Category B parameter limits or allowable values are exceeded. In lieu of these current Actions under these conditions, ITS 3.8.6 ACTIONS provide compensatory Required Actions and associated Completion Times when battery parameters are not within limits. This changes the CTS by replacing the current ACTIONS with new compensatory ACTIONS for battery parameters not within limits. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.8.6 ACTIONS	3.8.2.1 3.8.2.2	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.6 L02	CTS 4.8.2.1.b requires the performance of several Surveillances within 7 days after a battery discharge (battery terminal voltage below 105 volts (108.6 volts for spare battery D-52), or battery overcharge with battery terminal voltage above 143 volts. ITS 3.8.6 does not require these Surveillances to be performed after a battery discharge or overcharge. This changes the CTS by not including a specific Surveillance Requirement to perform these tests after a discharge or overcharge. This change is designated as less restrictive because Surveillances will be performed less frequently under ITS than under CTS.	3.8.6	4.8.2.1.b	7
3.8.6 L03	CTS 4.8.2.1.e requires an increased Frequency (Annually) from that in CTS 4.8.2.1.f, in accordance with the SFCP (60 months), for battery performance tests if the battery shows signs of degradation or has reached 85% [75% for Batteries 4B and D52 (Spare) when used in place of Battery 4B] of its expected service life. ITS SR 3.8.6.6 provides two Frequencies when a battery has reached 85% of its expected service life based on whether the battery's remaining capacity is less than 100% or not. If the battery's remaining capacity is less than 100% of the manufactures rating the required discharge test is performed every 12 months (annually). If the battery's remaining capacity is greater than or equal to 100% of the manufacture's rating, then the required discharge test is performed every 24 months. This changes the CTS by relaxing the Frequency of required discharge tests when the battery has reached 85% [75% for Batteries 4B and D52 (Spare) when used in place of Battery 4B] of its expected service life. This change is designated as less restrictive because less stringent SRs are being applied in the ITS than were applied in the CTS.	SR 3.8.6.6	4.8.2.1.e 4.8.2.1.f	7

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.6 L04	CTS 4.8.2.1.a.1 requires verifying the battery parameters in Table 4.8-2 meet Category A limits in accordance with the SFCP. CTS Table 4.8-2 Category A contains the parameter ‘Electrolyte Level’ with the limit for each designated pilot cell set at “> Minimum level indication mark, and ≤ 1/4” above maximum level indication mark.” CTS 4.8.2.1.b.1 requires verifying the parameters in Table 4.8-2 meet Category B limits in accordance with the SFCP. CTS Table 4.8-2, Category B, contains the parameter ‘Electrolyte Level’ with the limit for each connected cell set at “> Minimum level indication mark, and ≤ 1/4” above maximum level indication mark.” In addition, the Category B electrolyte level Allowable Value for each connected cell (which includes the pilot cells) is above the top of plates, and not overflowing. ITS SR 3.8.6.3 requires verifying each battery connected cell electrolyte level is greater than or equal to minimum established design limits in accordance with the SFCP. This changes the CTS by deleting the requirement to verify the pilot cells electrolyte level is within limits in accordance with the SFCP. This change is designated as less restrictive because Surveillances which are required in CTS will not be required in ITS.	SR 3.8.6.3	4.8.2.1.a.1 4.8.2.1.b.1	5
3.8.6 L05	CTS 4.8.2.1.b.1 requires verifying the battery parameters in Table 4.8-2 meet Category B limits in accordance with the SFCP. CTS Table 4.8-2, Category B, contains the parameter ‘Electrolyte Level’ with an Allowable Value for each connected cell of “Above top of plates, and not overflowing.” In addition, Note (3) states that with any Category B parameter not within its Allowable Value indicates an inoperable battery. ITS SR 3.8.6.3 requires verifying each battery connected cell electrolyte level is greater or equal to minimum established design limits in accordance with the SFCP. ITS 3.8.6, Required Action C.1, requires restoration of battery’s electrolyte level to above the top of the plates within 8 hours or Condition F is entered with a Required Action to declare the associated battery inoperable	SR 3.8.6.3	4.8.2.1.b.1	5

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.6 L05 (continued)	immediately. This changes the CTS by relaxing the requirement of immediately declaring the battery inoperable and allows 8 hours to restore the battery parameter to within limits before declaring the battery inoperable. This change is designated as less restrictive because Surveillances which are required in CTS will not be required in ITS.			
3.8.6 L06	CTS 4.8.2.1.a.1 requires verifying the battery parameters in Table 4.8-2 meet Category A limits in accordance with the SFCP. CTS Table 4.8-2, Category A, contains the parameter 'Float Voltage' with a limit for each designated pilot cell of "≥ 2.13 volts." ITS SR 3.8.6.2 requires the verification that each pilot cell voltage is ≥ 2.07 V. ITS 3.8.6, ACTION A, addresses the condition in which one or more batteries with one or more battery cells float voltage less than 2.07 V. Once ACTION A has been entered, the battery cell is considered degraded, and the Required Actions are to perform SR 3.8.4.1 and SR 3.8.6.1 within 2 hours. This changes the CTS by reducing the acceptance criteria for pilot cell voltage limits from ≥ 2.13 V to ≥ 2.07 V. This change is designated as less restrictive because less stringent SRs are being applied in the ITS than were applied in the CTS.	SR 3.8.6.2	4.8.2.1.a.1	6
3.8.6 L07	CTS 4.8.2.1.a.1 requires the verification that the pilot cell specific gravity is within the Category A limits of Table 4.8-2, as modified by footnote (4) and CTS 4.8.2.1.b.1 requires the verification that the connected cell specific gravity is within the Category B limits of Table 4.8-2, as modified by footnote (4). As indicated in CTS Table 4.8-2 (footnote (4)), the specific gravity limit must be corrected for electrolyte temperature and level. ITS 3.8.6 does not include these Surveillances. This changes the CTS by deleting the Surveillances to verify battery cell specific gravity.	None	4.8.2.1.a.1	5

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.6 L07 (continued)	This change is designated as less restrictive because Surveillances which are required in CTS will not be required in ITS.			
3.8.7 L01	CTS 3.8.3.1, ACTION c, requires, in part, that with the inverter not connected to its associated DC bus, to reenergize the AC vital panel from an inverter connected to its associated DC bus within 24 hours or in accordance with the RICT Program, or be in at least HOT STANDBY within the next 12 hours and in COLD SHUTDOWN within the following 30 hours. ITS 3.8.7, ACTION B, requires that with the Required Action and associated Completion Time (Restore inverter to OPERABLE status within 24 hours or in accordance with the RICT Program) of Condition A not met, to be in MODE 3 in 12 hours and MODE 4 in 18 hours. In addition, a Note is added to prevent the use of ITS LCO 3.0.4.a. This changes the CTS by requiring a less restrictive end state in the required actions, MODE 4 (HOT SHUTDOWN) instead of MODE 5 (COLD SHUTDOWN). This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.8.7, ACTION B	3.8.3.1, Action c	4
3.8.8 L01	CTS 3.8.3.2 ACTION requires, in part, that with any of the above required electrical busses not energized in the required manner, the RCS must be depressurized and vented within 8 hours through at least a 2.2 square inch vent. ISTS 3.8.8 does not include this Required Action. ITS LCO 3.4.12, "Overpressure Mitigation System," provides requirements for RCS pressure relief when in MODES 4, 5, or 6, to depressurize and establish an RCS vent of ≥ 2.2 square inches within 24 hours if the other pressure relief methods are incapable of limiting pressure. This changes the CTS by relying on ITS LCO 3.4.12 to provide the Required Actions and allowing a longer Completion Time to depressurize the RCS and establish a ≥ 2.2 square inch RCS vent.	LCO 3.4.12	3.8.3.2 Action	3

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.8 L01 (continued)	This change is designated as less restrictive because additional time is allowed to restore parameters to within the LCO limits than was allowed in CTS.			
3.8.8 L02	CTS 3.8.3.2 ACTION states, in part, that that with any of the above required electrical busses not energized in the required manner, immediately suspend all operations involving CORE ALTERATIONS, positive reactivity changes, or movement of irradiated fuel. ITS 3.8.8, Required Actions A.1, A.2.1, and A.2.2, provide Actions to be performed under similar conditions. These ITS Required Actions state to declare affected required feature(s) inoperable, or to suspend movement of irradiated fuel assemblies and suspend operations involving positive reactivity additions that could result in loss of required SHUTDOWN MARGIN (SDM) or boron concentration. This changes the CTS Actions by deleting the requirement to suspend CORE ALTERATIONS and to clarify to only suspend positive reactivity additions when it could result in loss of required SDM or boron concentration. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.8.8, Required Actions A.1, A.2.1, and A.2.2,	3.8.3.2 Action	4
3.8.9 L01	CTS LCO 3.8.3.1 requires the 120 VAC vital panels to be energized from the associated inverters connected to a DC bus. CTS 3.8.3.1, ACTION c, states, in part, that with one AC vital panel either not energized from its associated inverter, or with the inverter not connected to its associated DC bus to reenergize the AC vital panel. There is no other LCO requirement for the inverters to be OPERABLE or actions if inoperable. In the ITS, the inverters are in a separate Specification (ITS 3.8.7 for MODES 1, 2, 3, and 4 or ITS 3.8.8 for the MODES 5 and 6, and during movement of irradiated fuel assemblies). The 120 VAC vital panels are in separate	3.8.9 3.8.10	LCO 3.8.3.1 Action c	1

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.9 L01 (continued)	Specifications under the same conditions (ITS 3.8.9 and ITS 3.8.10, respectively). CTS 3.8.3.1, Action c, requires that when a 120 Volt AC vital panel is either not energized from its associated inverter, or with the inverter not connected to its associated DC bus to 1) reenergize the AC vital panel within 2 hours or in accordance with the RICT Program, and 2) reenergize the AC vital panel from an inverter connected to its associated DC bus within 24 hours or in accordance with the RICT Program. ITS LCO 3.8.9, in part, requires four unit AC vital electrical power distribution subsystems and required opposite unit AC vital electrical power distribution subsystems to support high head safety injection subsystem, CREVS, CREATCS, and EDG automatic load sequencers. ITS 3.8.9 ACTION B requires, with one or more AC vital electrical power distribution subsystems inoperable, to restore the AC vital electrical power distribution subsystem(s) to OPERABLE status within 2 hours or in accordance with the RICT Program. ITS 3.8.7 ACTION A requires, with one required inverter inoperable, to restore the inverter to OPERABLE status within 24 hours or in accordance with the RICT Program. This changes the CTS by allowing the 120 VAC vital buses to be considered OPERABLE when powered from a source other than the inverter connected to a DC bus. This change is designated as less restrictive because less stringent LCO requirements are being applied in the ITS than were applied in the CTS.			
3.8.9 L02	CTS LCO 3.8.3.1 requires the 125 VDC buses to be energized from an associated battery charger and from a battery bank or the spare battery bank D-52. CTS 3.8.3.1, Action d, requires that with one DC bus not energized from its associated battery bank or associated charger, reenergize the DC bus from its associated battery bank within 2 hours* or in accordance with the RICT Program. The * footnote allows extension of the action time from 2 hours to 24 hours, in part, when the opposite unit is in MODE 5, 6, or defueled. ITS LCO 3.8.9	LCO 3.8.9 ACTION C ACTION D	LCO 3.8.3.1, 3.8.3.1 Action d	1

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.9 L02 (continued)	requires, in part, four DC electrical power distribution trains to be OPERABLE. ITS 3.8.9, ACTIONS C and D, require, with one or more DC trains inoperable (i.e., not energized) to restore the DC electrical buses to OPERABLE status (i.e., reenergized) within the same required Completion Time as the CTS actions. However, the action does not explicitly require the DC bus to be reenergized from its associated battery bank. This changes the CTS by allowing the LCO and ACTIONS associated with the 125 VDC buses to be met when powered from either its associated battery, spare battery, or a qualified battery charger (normal or backup battery charger). This change is designated as less restrictive because less stringent LCO requirements are being applied in the ITS than were applied in the CTS.			
3.8.9 L03	CTS 3.8.3.1 ACTION a, in part, states "With one of the required trains of A.C. emergency busses not fully energized..." CTS 3.8.3.1, ACTION c, in part, states "With one A.C. vital panel either not energized from its associated inverter, or with the inverter not connected to its associated D.C. bus..." CTS 3.8.3.1, ACTION d, in part, states "With one D.C. bus not energized from its associated battery bank or associated charger..." ITS LCO 3.8.9, Condition A, states "One or more required AC electrical power distribution trains inoperable." ITS LCO 3.8.9, Condition B, states "One or more AC vital electrical power distribution subsystems inoperable." ITS LCO 3.8.9, Condition C, states "One or more opposite unit DC electrical power distribution trains inoperable." ITS LCO 3.8.9 Condition D states "One or more DC electrical power distribution trains inoperable for reasons other than Condition C." ITS LCO 3.8.9, Condition G, provides the appropriate Required Action if two or more electrical power distribution trains or subsystems become inoperable and a loss of safety function occurs. This changes the CTS by allowing more than one electrical	LCO 3.8.9, Conditions A, B, C, D, and G	3.8.3.1 Action a Action c Action d	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.9 L03 (continued)	power distribution train or subsystem to be inoperable provided a loss of safety function has not occurred. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.			
3.8.9 L04	CTS 3.8.3.1, ACTION a, in part, require, if the associated required actions and completion times are not met, to be in in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. ITS 3.8.9, ACTION E, requires, with the Required Action and associated Completion Time of Condition A, B, C, or D not met, to be in MODE 3 in 6 hours and MODE 4 in 12 hours. This changes the CTS by requiring a less restrictive end state in the required actions, MODE 4 (HOT SHUTDOWN) instead of MODE 5 (COLD SHUTDOWN). This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.8.9, ACTION E	3.8.3.1 Action a	4
3.8.9 L05	CTS 3.8.3.1, ACTION c and ACTION d, in part, require, if the associated Required Action and Completion Time are not met, to be in in at least HOT STANDBY within the next 12 hours and in COLD SHUTDOWN within the following 30 hours. ITS 3.8.9, ACTION F requires, with the Required Action and associated Completion Time of Condition A, B, C, or D not met, to be in MODE 3 in 12 hours and MODE 4 in 18 hours. This changes the CTS by requiring a less restrictive end state in the required actions, MODE 4 (HOT SHUTDOWN) instead of MODE 5 (COLD SHUTDOWN).	3.8.9, ACTION F	3.8.3.1 Action C	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.9 L05 (continued)	This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.			
3.8.9 L06	CTS LCO 3.8.3.1 Action d, with one DC bus not energized from its associated battery bank or associated charger, requires action to reenergize the DC bus from its associated battery bank within 2 hours* or in accordance with the RICT Program. The * footnote allows extension of the action time from 2 hours to 24 hours when the opposite unit is in MODE 5, 6, or defueled and each of the remaining required battery chargers is capable of being powered from its associated diesel generators. ITS 3.8.9, ACTION C, requires, with one or more opposite DC trains inoperable (i.e., not energized), to restore the DC electrical power distribution train(s) to OPERABLE status (i.e., reenergized) within 24 hours or in accordance with the RICT Program. The ITS ACTION is only applicable when the opposite unit is in MODE 5 or 6 or defueled. This changes the CTS by not explicitly requiring the remaining battery chargers to be capable of being powered from its associated diesel generator(s) to apply the extended allowable outage time (AOT) of a DC bus. This change is designated as less restrictive because less stringent requirements associated with an action are being applied in the ITS than were applied in the CTS.	3.8.9, ACTION C	LCO 3.8.3.1 Action d	4
3.8.10 L01	CTS 3.8.3.2 states that as a minimum, the following electrical busses shall be energized in the specified manner with a specific manner of energization, then provides a list of buses with a specific manner of energization listed for the 120 VAC vital buses and the 125 VDC buses. In addition, CTS 3.8.3.2 ACTION provides actions to perform if the buses are not energized in the required manner: ITS 3.8.10 states that the necessary portion of AC and DC electrical power distribution trains, and AC vital electrical power distribution subsystems shall be OPERABLE to support equipment required to be OPERABLE. This	3.8.10 SR 3.8.10.1	3.8.3.2 Action 4.8.3.2	1

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.10 L01 (continued)	changes the CTS by specifying how the buses must be energized, stating that the trains and subsystems must be OPERABLE, thus relying on the definition of OPERABLE/OPERABILITY to decide the manner of energization. This change is designated as less restrictive because less stringent LCO requirements are being applied in the ITS than were applied in the CTS.			
3.8.10 L02	CTS 3.8.3.2 ACTION requires, in part, that with any of the above required electrical buses not energized in the required manner, the RCS must be depressurized and vented within 8 hours through at least a 2.2 square inch vent. ISTS 3.8.10 does not include this Required Action. ITS LCO 3.4.12, "Overpressure Mitigation System," provides requirements for RCS pressure relief when in MODES 4, 5, or 6 to depressurize and establish an RCS vent of ≥ 2.2 square inches within 24 hours if the other pressure relief methods are incapable of limiting pressure. His changes the CTS by relying on ITS LCO 3.4.12 to provide the Required Actions and allowing a longer Completion Time to depressurize the RCS and establish a ≥ 2.2 square inch RCS vent. This change is designated as less restrictive because additional time is allowed to restore parameter to within LCO limits than was allowed in CTS.	LCO 3.4.12	3.8.3.2 Action	3
3.8.10 L03	CTS 3.8.3.2 ACTION states, in part, that that with any of the above required electrical busses not energized in the required manner, immediately suspend all operations involving CORE ALTERATIONS, positive reactivity changes, or movement of irradiated fuel. ITS 3.8.10, Required Actions A.2.1 and A.2.2, provide Actions to be performed	3.8.10 Required Action A.2.1 Required Action A.2.2	3.8.3.2 Action	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.10 L03 (continued)	under similar conditions. These ITS Required Actions state to suspend movement of irradiated fuel assemblies and suspend operations involving positive reactivity additions that could result in loss of required SHUTDOWN MARGIN (SDM) or boron concentration. This changes the CTS Actions by deleting the requirement to suspend CORE ALTERATIONS and to clarify to only suspend positive reactivity additions when it could result in loss of required SDM or boron concentration. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.			
Refer to DOC section in ML23151A452	**Section 3.9, Refueling Operations**			
3.9.1 L01	CTS 3.9.1 provides a limit on the boron concentration of all filled portions of the RCS and the refueling canal when in MODE 6. ITS 3.9.1 modifies the Applicability with a Note which states "Only applicable to the refueling canal and refueling cavity when connected to the RCS." This changes the CTS by eliminating the applicability of the boron concentration limit on the refueling canal and refueling cavity when those volumes are not connected to the RCS. This change is designated as less restrictive because the LCO requirements are applicable in fewer operating conditions than in the CTS.	3.9.1 Applicability	3.9.1	2

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.1 L02	CTS 3.9.1 ACTION specifies the compensatory actions for when the boron concentration requirement is not met. One of the compensatory actions is to suspend CORE ALTERATIONS. Under similar conditions, ITS 3.9.1 does not require suspension of CORE ALTERATIONS. This changes the CTS by deleting the requirement to suspend CORE ALTERATIONS when the boron concentration requirement is not met. This change is designated as less restrictive because less stringent Required Actions are being applied to the ITS than were applied in the CTS.	3.9.1	3.9.1 Action	4
3.9.1 L03	CTS 3.9.1 ACTION states that when the boron concentration is not met to initiate and continue boration at greater than or equal to 16 gpm of a solution containing greater than or equal to 5245 ppm boron or its equivalent until K_{eff} is reduced to less than or equal to 0.95 or the boron concentration is restored to greater than or equal to 2300 ppm, whichever is the more restrictive. ITS 3.9.1 Required Action A.2 requires the initiation of an action to restore boron concentration to within limit. This changes the CTS by eliminating the specific requirements for the boric acid solution to be used to restore compliance with the LCO. This change has been designated as a less restrictive change because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.9.1 Required Action A.2	3.9.1 Action	4

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.1 L04	CTS 4.9.1.1 requires the reactivity condition of the RCS to be determined prior to removing or unbolting the reactor vessel head, and prior to withdrawal of any full-length control rod in excess of three feet from its fully inserted position. ITS 3.9.1 does not contain this SR. This changes the CTS by deleting a SR to determine reactivity conditions prior to removing or unbolting the reactor vessel head, and prior to withdrawal of any full-length control rod in excess of three feet from its fully inserted position. This change is designated as less restrictive because a Surveillance required in the CTS will not be required in the ITS.	None	4.9.1.1	5
3.9.1 L05	CTS 4.9.1.3 requires the valves isolating unborated sources to be verified closed and secured in position by mechanical stops or by removal of air or electrical power in accordance with the SFCP. CTS SR 4.9.1.3 is modified by a Note that allows the primary water supply to the boric acid blender to be opened under administrative controls for makeup. ITS 3.9.1 will not contain this SR. This changes the CTS by deleting a SR to verify valves isolating unborated sources to be verified and the Note that modifies the SR. This change is designated as less restrictive because a Surveillance required in the CTS will not be required in ITS,	None	4.9.1.3	5
3.9.2 L01	CTS Surveillance Requirement (SR) 4.9.10 requires the verifying refueling cavity water level is ≥ 23 feet above the top of the reactor vessel flange within 2 hours prior to the start of movement of irradiated fuel assemblies within containment and in accordance with the Surveillance Frequency Control Program (SFCP). ITS SR 3.9.2.1 contains the same surveillance as in the CTS and requires it to be verified in accordance with the SFCP but does not contain the 2-hour Surveillance Frequency requirement. This changes the CTS by	SR 3.9.2.1	4.9.10	7

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.2 L01 (continued)	eliminating the 2-hour Frequency requirement prior to movement of irradiated fuel assemblies within containment. This change is designated as less restrictive because a SR Frequency is being eliminated.			
3.9.3 L01	ITS 3.9.3 contains a Required Action A.2 Note that states, "Fuel assemblies, sources, and reactivity control components may be moved if necessary to restore an inoperable source range neutron flux monitor or to complete movement of a component to a safe condition." The CTS does not contain this Note, but the CTS definition of CORE ALTERATIONS allow for the completion of movement of a component to a safe position. This changes the CTS by adding a requirement for fuel assemblies, sources, and reactivity control components to be moved, if necessary, to restore an inoperable Source Range Neutron Flux Monitor. This change is designated as less restrictive because the Note provides an allowance that is not currently required in the CTS.	3.9.3 Required Action A Note	None	4
3.9.3 L02	CTS 4.9.2.b requires a COT to be performed within 8 hours prior to the initial start of CORE ALTERATIONS. ITS 3.9.3 SRs do not require the performance of similar tests for the required Source Range Neutron Flux Monitors. This changes the CTS by deleting the COT Frequency of within 8 hours of CORE ALTERATIONS. This change is designated as less restrictive because a Surveillance Frequency for the COT required in the CTS will not be required in the ITS.	3.9.3	4.9.2.b	5

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.3 L03	CTS 3.9.2 requires, in part, one primary and, one primary or backup source range neutron flux monitor to be OPERABLE in MODE 6. It is unnecessary to specify whether a primary or backup monitor is employed during operation in MODE 6. This changes the CTS by relocating this information to the TS Bases. This change is designated as less restrictive because less stringent requirements are being applied in the ITS than were applied in the CTS.	3.9.3	3.9.2	1
3.9.4 L01	CTS 3.9.9 Applicability states “During movement of irradiated fuel within containment.” ITS 3.9.4 Applicability states “During movement of recently irradiated fuel assemblies within containment.” This changes the CTS by modifying the Applicability to when only “recently” irradiated fuel assemblies are being moved versus any irradiated fuel assembly. This change is designated as less restrictive because the LCO requirements are applicable in fewer operating conditions in ITS than in CTS.	3.9.4 Applicability	3.9.9 Applicability 4.9.9	2
3.9.4 L02	CTS Surveillance Requirement (SR) 4.9.4 requires each containment building penetration to be determined to be either in its closed/isolated condition or capable of being closed by an OPERABLE automatic containment ventilation isolation valve within 100 hours prior to the start of movement of irradiated fuel in the containment building. ITS SR 3.9.4.2 does not contain this requirement. This changes the CTS by eliminating the requirement to perform the SR 100 hours prior to the start of movement of recently irradiated fuel in the containment building.	SR 3.9.4.2	4.9.4 4.9.9	5

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.4 L02 (continued)	This change is designated as less restrictive because a Surveillance Frequency required in the CTS will not be required in the ITS.			
3.9.5 L01	3.9.8.1 ACTION requires a series of Actions when there are no RHR loops in operation. One of those Actions is to close all containment penetrations providing direct access from the containment atmosphere to the outside atmosphere. ITS 3.9.5 requires similar Actions (the ITS lists them individually) to close the containment penetrations; however, the ITS also allows those penetrations that are capable of being closed by the containment ventilation isolation system to be verified as capable of being closed. This changes the CTS by relaxing the requirement to close those penetrations that are isolated by the containment ventilation isolation system. This change has been designated as a less restrictive change because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.9.5	3.9.8.1 Action	4
3.9.5 L02	CTS LCO 3.9.8.1 requires that at least one residual heat removal (RHR) loop shall be OPERABLE and in operation.* CTS LCO 3.9.8.1 footnote * states that the required RHR loop may be removed from operation for up to 1 hour per 8-hour period, provided no operations are permitted that would cause reduction of the Reactor Coolant System boron concentration. ITS LCO 3.9.5 states, "one RHR loop shall be OPERABLE and in operation" and is modified by a Note that states, "The required RHR loop may be removed from operation for ≤ 1 hour per 8 hour period, provided no operations are permitted that would cause introduction of coolant into the Reactor Coolant System with boron concentration less than that required to meet the minimum required boron concentration of LCO 3.9.1." This changes the CTS by allowing coolant with boron concentration less than the RCS boron concentration, but greater than the boron concentration limit in ITS	3.9.5	LCO 3.9.8.1	1

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.5 L02 (continued)	LCO 3.9.1, to be added to the RCS when the RHR loops are not in operation. This change has been designated as a less restrictive change because less stringent Required Actions are being applied in the ITS than were applied in the CTS.			
3.9.6 L01	ITS 3.9.6 contains a LCO Note that allows all RHR pumps to be removed from operation for ≤ 15 minutes when switching from one train to another provided: a. The core outlet temperature is maintained > 10 degrees F below saturation temperature, b. No operations are permitted that would cause introduction of coolant into the RCS with boron concentration less than that required to meet the minimum required boron concentration of LCO 3.9.1, and c. No draining operations to further reduce RCS water volume are permitted. CTS 3.9.8.2 does not contain this note. This changes the CTS by adding a Note that allows all the RHR pumps to be removed from operation for a limited period of time with provisions. This change is designated as less restrictive because less stringent LCO requirements are being applied in the ITS than were applied in the CTS.	3.9.6 LCO Note	None	1

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.6 L02	CTS 3.9.8.2 ACTION requires a series of Actions when there are no RHR loops in operation. One of those Actions is to close all containment penetrations providing direct access from the containment atmosphere to the outside atmosphere. ITS 3.9.6 requires similar Actions (the ITS lists them individually) to close the containment penetrations; however, the ITS also allows those penetrations that are closed by the containment ventilation isolation system to be verified capable of being closed. This changes the CTS by relaxing the requirement to close those penetrations that are isolated by the containment ventilation isolation system. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.	3.9.6	3.9.8.2 Action	4
Refer to DOC section in ML22089A454	**Chapter 5.0, Administrative Controls**			
5.2 L01	CTS 6.2.2.h requires the Assistant Operations Manager to hold a senior reactor operator license and CTS 6.2.2.i requires the Operations Manager to hold or have held a senior reactor operator license at PTN or another pressurized water reactor (PWR) or have completed the PTN Senior Management Operations Training Course. ITS 5.2.2.d requires either the Assistant Operations Manager or the Operations Manager to hold a senior reactor operator license. This changes the CTS by allowing the flexibility of either the Assistant Operations Manager or the Operations Manager to hold a senior reactor operator license instead of specifically requiring the Assistant Operations Manager to hold a senior reactor operator license. This change is designated as less restrictive because less stringent requirements are being applied in the ITS then were applied in the CTS.	5.2.2.d	6.2.2.h 6.2.2.i	None

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.2 L02	The CTS Table 6.2-1 lists the minimum shift crew composition and provides a provision stating that the shift crew composition may be one less than the minimum requirements of Table 6.2-1 for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2-1. The provision further states that this provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent. ITS 5.2.2.b provides a similar provision but excludes the restriction that eliminates the use of this provision due to an oncoming shift crewman being late or absent. This changes the CTS by allowing the crew composition to be one less than required due to an oncoming shift crew member being late or absent. This change is designated as less restrictive because less stringent requirements are being applied in the ITS then were applied in the CTS.	5.2.2.b	Table 6.2-1	None
5.5 L01	CTS 6.8.4.j.d. provides the provisions for SG tube inspections. CTS 6.8.4.j.d.2 requires, in part, each SG at least every 48 effective full power months or at least every other refueling outage (whichever results in more frequent inspections). In addition, the minimum number of tubes inspected at each scheduled inspection shall be the number of tubes in all SGs divided by the number of SG inspection outages scheduled in each inspection period as defined in CTS 6.8.4.j.d.2 parts a, b, and c. ITS 5.5.6.d.2 requires inspection of 100% of the tubes in each SG at least every 54 effective full power months (EFPMs) which defines the inspection period. ITS 5.5.6.d.2 also allows an exemption that if none of the SG tubes have ever experienced cracking other than in regions that are exempt from inspection by alternate repair criteria and the SG inspection was performed with enhanced probes, the inspection period mat be extended to 72 EFPMs and provides requirements for the use of	5.5.6.d.2	6.8.4.j.d.2	7

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.5 L01 (continued)	enhanced probes. CTS 6.8.4.j.d.3 requires, in part, that if cracks are found the next inspection for each affected and potentially affected SG for the degradation mechanism that caused the crack indication shall not exceed 24 EFPMs or one refueling outage (whichever results in more frequent inspections). ITS 5.5.6.d.3 requires the additional inspection on each affected and potentially affected SG at the next refueling outage but may be deferred to the following refueling outage if the 100% inspection of all SGs was performed with enhanced probes as described in paragraph d.2. This changes the CTS by modifying the inspection frequency to a single requirement to inspect 100% of the SG tubes at a frequency of 54 EFPMs (unless permitted by other requirements of ITS 5.5.6.d.2) and modifying the inspection frequency when crack indications are discovered to the next refueling outage or the following outage. This change designated as less restrictive because the maximum inspection frequencies for tube inspections was extended beyond the current inspection periods.			
5.5 L02	CTS 6.8.4.e requires performance of the “clear and bright” test, used to establish the acceptability of new fuel oil for use prior to addition to storage tanks. ITS 5.5.10.a.3 requires a determination that the fuel oil has a clear and bright appearance with proper color or that water and sediment content is within limits. This changes the CTS by allowing a “water and sediment content” test to be performed to establish the acceptability of new fuel oil instead of only allowing a “clear and bright” test. This change is designated as less restrictive because test acceptance criteria required in the CTS will have alternative acceptance criteria allowed in ITS.	5.5.10.a.3	6.8.4.e	6

Table L – Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.7 L01	CTS 6.12.1 provides requirements for radiation monitoring of individuals entering a high radiation area. ITS 5.7.1.d provides similar requirements adding an option for remote monitoring by a radiation protection personnel adding a radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area. This changes the CTS by providing an additional device that an individual entering these high radiation areas must possess for radiation monitoring. This change is designated as less restrictive because a new alternative for measuring personnel dose in high radiation areas has been provided.	5.7.1.d	6.12.1	1

Change Categories:

Category 1 – Relaxation of LCO Requirements
Category 2 – Relaxation of Applicability
Category 3 – Relaxation of Completion Time
Category 4 – Relaxation of Required Action
Category 5 – Deletion of Surveillance Requirement
Category 6 – Relaxation of Surveillance Requirement Acceptance Criteria
Category 7 – Relaxation of Surveillance Frequency
Category 8 – Deletion of Surveillance Requirement Shutdown Performance Requirements

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
Refer to DOC section in ML23151A443	**Chapter 3.0, LCO and SR Applicability**		
3.0 M01	CTS 3.7.6 Action provides the actions for inoperable snubbers and requires that with one or more snubbers inoperable on any system, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and determine the impact on the attached component by evaluation in accordance with Specification 4.7.6 or declare the attached system inoperable and follow the appropriate ACTION statement for that system. In the ITS, the actions for inoperable snubbers are incorporated into ITS LCO 3.0.8. When one or more required snubbers are unable to perform the associated support function(s), any affected supported LCO(s) is not required to be declared not met if risk is assessed and managed, and either: a) the snubbers not able to perform the support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform the support function within 72 hours; or b) the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours. At the end of the specified period (i.e., 12 hours or 72 hours) snubbers must be able to perform their associated function(s), or the affected system LCO(s) shall be declared not met. This changes the CTS by requiring the risk associated with inoperable snubbers to be assessed and managed and requires the snubbers to be restored to OPERABLE status in all cases, and in certain cases within a more restrictive Completion Time. This change is designated as more restrictive because inoperable snubbers must be restored to OPERABLE status under certain conditions within a more restrictive Completion Time and the risk associated with inoperable snubbers must always be assessed and managed.		3.7.6

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 M02	CTS 4.0.2 states, "Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval." ITS SR 3.0.2 states, "The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met. For Frequencies specified as "once," the above interval extension does not apply. If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance. Exceptions to this Specification are stated in the individual Specifications." This changes the CTS by adding "For Frequencies specified as "once," the above interval extension does not apply." The remaining changes to CTS 4.0.2 are discussed in DOC A10 for TS 3.0. This change is designated as more restrictive because an allowance to extend frequencies by 25% is eliminate for certain surveillances.	SR 3.0.2	4.0.2
Refer to DOC section in ML23151A444	**Section 3.1, Reactivity Control Systems**		
3.1.1 M01	CTS 4.1.1.1.1.e requires SDM to be determined to be within its limits every 24 hours when in MODES 3 and 4. ITS Surveillance Requirement (SR) 3.1.1.1 requires SDM to be determined to be within its limits in MODE 2 with $k_{eff} < 1.0$ and MODES 3 and 4. This changes the CTS by expanding the applicability of the Surveillance to include MODE 2 with $k_{eff} < 1.0$. This change is designated as more restrictive because it expands the conditions under which a Surveillance must be performed.	SR 3.1.1.1	4.1.1.1.1.e

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.2 M01	CTS SR 4.1.1.1.2 requires verification that core reactivity is within ± 1% Δk/k in MODES 1 or 2, in accordance with the Surveillance Frequency Control Program (SFCP). ITS SR 3.1.2.1 requires this verification to be performed “prior to entering MODE 1 following each refueling.” This changes the CTS by removing the option of performing the initial surveillance in MODE 1. This change is designated as more restrictive because it restricts the conditions under which a Surveillance must be performed.	SR 3.1.2.1	4.1.1.1.2
3.1.4 M01	CTS 3.1.3.1 ACTION b states “With more than one full length rod inoperable or misaligned from the group step counter demand position by more than ± 12 steps and THERMAL POWER greater than 90% of RATED THERMAL POWER, within 1 hour either: 1. Restore all indicated rod positions to within the Allowed Rod Misalignment, or 2. Reduce THERMAL POWER to less than 90% of RATED THERMAL POWER and confirm that all indicated rod positions are within the Allowed Rod Misalignment, or 3. Be in HOT STANDBY within the following 6 hours.” CTS 3.1.3.1 ACTION c states “With more than one full length rod inoperable or misaligned from the group step counter demand position by more than ± 18 steps and THERMAL POWER less than or equal to 90% of RATED THERMAL POWER, within 1 hour either: 1. Restore all indicated rod positions to within the Allowed Rod Misalignment, or 2. Be in HOT STANDBY within the following 6 hours.” ITS 3.1.4 ACTION D adds additional requirements (ITS 3.1.4 Required Actions D.1.1 and D.1.2) to verify SHUTDOWN MARGIN (SDM) is within the limits within 1 hour or to initiate boration to restore the required SHUTDOWN MARGIN to within limits. This changes the CTS by adding two additional Required Actions. This change has been designated as more restrictive because it adds explicit actions to verify SDM or to restore SDM within limits.	3.1.4 ACTION D	3.1.3.1 Actions b and c

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.4 M02	CTS 3.1.3.1 ACTION d requires that with one full length rod misaligned, POWER OPERATION may continue provided certain actions are completed within one hour. If those actions are not complete, CTS 3.0.3 is required to be entered since no further actions are specified. CTS 3.0.3 allows 1 hour to initiate action and 6 additional hours for the unit to be placed in MODE 3. ITS 3.1.4 ACTION C states that if the Required Action and associated Completion Time of Condition B is not met, the unit must be in MODE 3 within 6 hours. This changes the CTS by providing a specific default condition instead of requiring entry into CTS 3.0.3, and thereby reduces the time to reach MODE 3 following discovery of a misaligned rod if Required Actions are not met from 7 hours to 6 hours. This change is designated as more restrictive since the 1 hour specified in CTS 3.0.3 no longer applies.	3.1.4 ACTION C	3.1.3.1 Action d
3.1.4 M03	CTS 3.1.3.4 ACTION requires that with the drop time of any full-length rod determined to exceed the above limit, restore the rod drop time must be restored to within the above limit prior to proceeding to MODE 1 or 2. ITS 3.1.4 ACTION A applies with one or more rods inoperable. ITS 3.1.4 ACTION A requires verification that the SDM is within the limits specified in the Core Operating Limits Report (COLR) or initiate boration to restore the SDM to within limit within one hour, and to be in MODE 3 within 6 hours. This changes the CTS by adding new requirements associated with SDM and changing the requirement to be outside of the MODE of Applicability from 7 hours to 6 hours. The change has been designated as more restrictive because it adds explicit actions to verify SDM or to restore SDM within limits and reduces the time required to be in MODE 3.	3.1.4 ACTION C	3.1.3.4 Action

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.5 M01	CTS 3.1.3.5 is applicable in MODES 1 and 2 with $k_{eff} \geq 1.0$. MODE 2 is modified by CTS 3.1.3.5 footnote **. ITS 3.1.5 is applicable in MODES 1 and 2. This changes the CTS by expanding the Applicability from MODE 2 with the reactor critical to all of MODE 2. This change is designated as more restrictive because it increases the conditions under which TS controls will be applied.	3.1.5	3.1.3.5
3.1.6 M01	CTS 3.1.3.6 requires the control banks to be limited in physical insertion as specified in the Core Operating Limits Report (COLR). ITS LCO 3.1.6 requires the control banks to be within insertion, sequence and overlap limits specified in the COLR. ITS 3.1.6 ACTION C provides requirements when not meeting the sequence and overlap requirements. ITS SR 3.1.6.3 requires verification of the sequence and overlap limits in accordance with the SFCP. This changes the CTS by adding the requirements on the sequence and overlap limits to the TSs. This change is designated as more restrictive because new requirements are added to the CTS.	LCO 3.1.6 3.1.6.3 ACTION C SR 3.1.6.3	3.1.3.6
3.1.6 M02	CTS 3.1.3.6 ACTION requires, in part, control banks inserted beyond the insertion limits to be restored within 2 hours. ITS 3.1.6 ACTION B contains the same requirements and adds the requirement to either verify the shutdown margin (SDM) is within limits or initiate boration to restore SDM to within limits within one hour. This changes the CTS by adding the requirement to verify SDM or to initiate boration to restore the SDM within one hour when control banks are below the insertion limits. This change is designated as more restrictive because requirements are added to the CTS.	3.1.6 ACTION B	3.1.3.6 Action

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.7 M01	CTS 3.1.3.2 ACTION a does not contain an ACTION to follow if the provided ACTIONS cannot be met. Therefore, CTS 3.0.3 would be entered, which would allow 1 hour to initiate a shutdown and 7 hours to be in HOT STANDBY. ITS 3.1.7 ACTION E requires the unit to be placed in MODE 3 with 6 hours if the Required Actions and associated Completion Time of ACTION A or D are not met. This changes the CTS by eliminating the one hour to initiate a shutdown and consequently allows one hour less for the unit to be in MODE 3. This change is designated as more restrictive because it allows less time to shutdown than is allowed in the CTS.	3.1.7 ACTION E	3.1.3.2 Action a
3.1.8 M01	CTS 3.10.3 states that limitations of certain Specifications may be suspended during the performance of PHYSICS TESTS and provides restrictions that must be followed when utilizing the CTS exception. ITS LCO 3.1.8 adds a requirement that SHUTDOWN MARGIN (SDM) must be within the limits provided in the COLR. A Surveillance (ITS SR 3.1.8.4), to verify the SHUTDOWN MARGIN in accordance with the Frequency Control Program, and an ACTION (ITS 3.1.8, ACTION A), to follow if the SDM is not met, are also added. This changes the CTS by imposing an additional requirement on the application of the test exception LCO. This change is designated as more restrictive because it imposes additional restrictions not found in the CTS.	LCO 3.1.8	3.10.3

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
Refer to DOC section in ML23151A445	**Section 3.2, Power Distribution Limits**		
3.2.1 M01	CTS 3.2.2 does not contain an Action to follow if ACTIONS a and b cannot be met. Therefore, CTS 3.0.3 would be entered, which would allow 1 hour to initiate a shutdown and to be in HOT STANDBY within 7 hours. ITS 3.2.1 ACTION E, states that the plant must be in MODE 2 within 6 hours, if any Required Action and associated Completion Time is not met. This changes the CTS by eliminating the one hour to initiate a shut down and, consequently, allowing one hour less for the unit to be in MODE 2. This change is designated as more restrictive because it allows less time to shut down than does the CTS.	3.2.1 ACTION E	3.0.3
3.2.1 M02	CTS 4.2.2.2 requires reducing THERMAL POWER one percent for every percent by which [Fj(Z)]s is exceeded when $F_j(Z)$ exceeds $[F_j(Z)]s$* as defined in the bases by ≤ 4%. ITS 3.2.1 Required Action B.1 also requires reducing THERMAL POWER ≥ 1% RTP for each 1% $F_j(Z)$ exceeds limit. However, ITS 3.2.1 Required Actions B.2, B.3, and B.4, also requires reducing the Power Range Neutron Flux – High and Overpower ΔT trip setpoints along with ensuring SR 3.2.1.1 is performed successfully prior to increasing power above THERMAL POWER limit of Required Action B.1. This changes the CTS by requiring additional Required Actions (reducing trip setpoints and requiring SR 3.2.1.1 to be performed successfully prior to increasing THERMAL POWER) whenever $F_Q(Z)$ not within limit when determined per SR 3.2.1.2 and $F_j(Z)$ exceeds limit by ≤ 4%. This change is designated as more restrictive because additional Required Actions are imposed.	3.2.1 ACTION B	4.2.2.2

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2.2 M01	CTS 3.2.3 ACTION c states that with $F^N_{\Delta H}$ exceeding its limit "subsequent POWER OPERATION may proceed provided that $F^N_{\Delta H}$ is demonstrated, through incore flux mapping, to be within the above limit prior to exceeding the following THERMAL POWER levels: 1. A nominal 50% of RATED THERMAL POWER, 2. A nominal 75% of RATED THERMAL POWER, and 3. Within 24 hours of attaining greater than or equal to 95% of RATED THERMAL POWER." However, under CTS 3.0.2, these measurements do not have to be completed, if compliance with the LCO is restored. ITS 3.2.2 ACTION A contains a Note which states, "Required Actions A.2 and A.3 must be completed whenever Condition A is entered." ITS 3.2.2 Required Action A.2 requires verification that $F_{\Delta H}$ min margin is within limits specified in the Core Operating Limits Report (COLR) 24 hours after entry into Condition A. Required Action A.3 requires verification that $F_{\Delta H}$ min margin is within limits specified in the COLR prior to THERMAL POWER exceeding 50% RTP and 75% RTP, and within 24 hours after THERMAL POWER is greater than or equal to 95% RTP. This changes the CTS by requiring the verification that $F_{\Delta H}$ min margin is within limits specified in the COLR to be made even if $F^N_{\Delta H}$ is restored to within its limit. This change is designated as a more restrictive change because it imposes requirements in addition to those in the CTS.	3.2.2 ACTION A	3.2.3 Action c
3.2.2 M02	CTS 3.2.3 does not contain an Action to follow if ACTIONS a and c cannot be met. Therefore, CTS 3.0.3 would be entered, which would allow 1 hour to initiate a shutdown and to be in HOT STANDBY within 7 hours. ITS 3.2.2 ACTION B, states that the plant must be in MODE 2 within 6 hours, if any Required Action and associated Completion Time is not met. This changes the CTS by eliminating the one hour to initiate a shut down and, consequently, allowing one hour less for the unit to be in MODE 2. This change is designated as more restrictive because it allows less time to shut down than does the CTS.	3.2.2 ACTION B	3.2.3 Action a Action c 3.0.3

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2.3 M01	CTS 3.2.1 is applicable in MODE 1 with THERMAL POWER > 50% RTP. ITS LCO 3.2.3 is applicable in MODE 1 with THERMAL POWER ≥ 50% RTP. This changes the CTS by requiring LCO 3.2.3 to be met when THERMAL POWER is equal to 50 % RTP. This change is designated as more restrictive because it provides additional requirements to the Applicability.	LCO 3.2.3	3.2.1
3.2.3 M02	CTS 3.2.1 Action b states “For Base Load operation above P_T with the AFD…” ITS 3.2.3 Condition A states “AFD not within limits during base load operation ≥ P_T.” This revises the CTS by changing “above” to “≥,” which changes the Condition to include P_T. This change is designated as more restrictive because it provides additional requirements to the Condition.	3.2.3 Condition A	3.2.1 Action b
3.2.4 M01	CTS 3.2.4 ACTION a.2.b states in part, within 2 hours, reduce THERMAL POWER at least 3% from RTP for each 1% of indicated QPTR in excess of 1.00. ITS 3.2.4 Required Action A.1 has a similar requirement to reduce THERMAL POWER ≥ 3% from RTP for each 1% of QPTR > 1.00. The Completion Time for ITS 3.2.4 Required Action A.1 is 2 hours after each QPTR determination. This changes the CTS by specifically requiring a power reduction, if applicable, after each QPTR determination. This change is designated as more restrictive because it adds required to the CTS.	3.2.4 Required Action A.1	3.2.4 Action a.2.b

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
Refer to DOC section in ML23151A446	**Section 3.3, Instrumentation**		
3.3.1 M01	CTS 3.3.1, ACTION 7, requires verification that the RTS interlocks are in the required state for the existing plant condition or requires CTS 3.0.3 to be applied. By applying CTS 3.0.3, 7 hours is allowed to reach MODE 3. Since the affected Functions are only applicable in MODE 1, the unit would essentially have 7 hours to be in MODE 2. ITS 3.3.1, ACTION Q requires the interlocks to be verified or requires ACTION R to be applied, which requires the unit to be in MODE 2 within 6 hours. This changes the CTS by allowing one less hour to reach MODE 2. This change is designated as more restrictive because more stringent requirements are being imposed.	3.3.1 ACTION Q	3.3.1 Action 7
3.3.1 M02	CTS 3.3.1, ACTION 9, requires the RTSBs to be opened within one hour. ITS 3.3.1, ACTION I, requires the RTSBs to be opened immediately. This changes the CTS by requiring the RTSBs to be opened sooner that previously required. This change is designated as more restrictive because a more stringent Completion Time is imposed in the ITS.	3.3.1 ACTION I	3.3.1, Action 9
3.3.1 M03	CTS Table 4.3-1 contains Notes 2, 3, and 6 that allow entry into MODES to perform SRs. The corresponding ITS SRs also allows entry into specific MODES to perform SRs; however, the ITS specifies time requirements, once the MODES are entered, to perform the SRs. This changes the CTS by specifying a time limit in which to perform the SRs. These changes are designated as more restrictive because additional requirements are being imposed that were not in the CTS.	3.3.1 SRs 3.3.1.2, 3.3.1.3, 3.3.1.6	Table 4.3-1 Notes 2, 3, and 6

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 M04	CTS 2.2.1 Action b addresses the condition when the trip setpoint is less conservative than the Allowable Value and requires either: Action b.1, the adjustment of the setpoint consistent with the Trip Setpoint value of Table 2.2-1 and to determine within 12 hours that the affected channel is OPERABLE; or Action b.2, the channel be declared inoperable and the applicable ACTION statement of TS 3.3.1 entered. ITS 3.3.1 requires the channel to be declared inoperable and the applicable ACTION entered, consistent with CTS 2.2.1 Action b.2. This changes the CTS by eliminating the option to evaluate OPERABILITY of an RTS Instrument Function within 12 hours after the trip setpoint is adjusted to within limit. This is a more restrictive limit because additional requirements are being imposed that were not in the CTS.	3.3.1 ACTIONS	2.2.1 Action b.1
3.3.2 M01	CTS Table 3.3-2 Action 15 states that with the number of OPERABLE channels one less than the total number of channels (for Functional Units 3.b.3), 4.c, 4.d, 4.e, or 5.b), operations may proceed provided the inoperable channel is placed in the tripped condition within 6 hours. CTS Table 3.3-2 Action 19 states that with less than the Minimum Number of Channels OPERABLE (for Functional Units 8a or 8.b), within 1 hour determine by observation of the associated permissive annunciator window(s) that the interlock is in its required state for the existing plant condition or apply Specification 3.0.3. CTS Table 3.3-2 Action 25 states that with number of OPERABLE channels one less than the Total number of channels (for the Tavg channel of Functional Units 1.f and 4.d), STARTUP and/or POWER OPERATION may proceed provided the inoperable channel is placed in the tripped condition within 6 hours or in accordance with the RICT Program. CTS Table 3.3-2 Action 26 states that with one channel inoperable (for Functional Units 1.c, 1.d, 1.3, 2.b, 6.b, and the steam line flow channels of Functional Units 1.f and 4.d), operation may proceed until performance of the next required ANALOG CHANNEL OPERATIONAL TEST (COT), or TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT) provided the inoperable channel is place in the tripped condition within 6 hours or in accordance with the RICT Program. If CTS Table 3.3-2 Action 15, Action 25, or Action 26 is not met, entry into CTS 3.0.3 is required since no further actions are specified. If CTS	3.3.2 ACTION M	Table 3.3-2 Action 15

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 M01 (continued)	Table 3.3-2 Action 19 is not met, entry into CTS 3.0.3 is required as directed. CTS 3.0.3 allows 1 hour to initiate action, 7 hours for the unit to be placed in MODE 3, 13 hours for the unit to be in MODE 4, and 37 hours for the unit to be in MODE 5. ITS 3.3.2 ACTION M requires the unit to be placed in MODE 3 in 6 hours and MODE 4 in 12 hours. This changes the CTS by providing a specific default condition instead of requiring entry into CTS 3.0.3, and reducing the time allowed to reach the applicable conditions. This change is designated as more restrictive because the Completion Times for the unit to be placed in the specified MODES have been decreased by 1 hour.		
3.3.2 M02	CTS Table 4.3-2, Channel Functional Unit 1.a (Safety Injection, Manual Initiation), "MODES for which Surveillance Required," column identifies that this Channel Functional Unit's surveillance is required in MODES 1, 2, and 3 while CTS Table 3.3-2 identifies that Functional Unit 1.a Applicable MODES are 1, 2, 3, and 4. ITS Table 3.3.2-1 identifies that this Functional Unit's Applicable MODES are 1, 2, 3, and 4. This changes the CTS MODE for which the surveillance is required from MODES 1, 2, and 3, to MODES 1, 2, 3, and 4, in the ITS. This change is designated as more restrictive because additional MODES of Applicability are applied to when Functional Unit 1.a (Safety Injection, Manual Initiation) surveillance is required.	Table 3.3.2-1 Function 1.a	Table 4.3-2 Functional Unit 1.a
3.3.2 M03	CTS 3.3.2 Action b addresses the condition when the trip setpoint is less conservative than the Allowable Value and requires either: Action b.1, the adjustment of the setpoint consistent with the Trip Setpoint value of Table 3.3-3 and to determine within 12 hours that the affected channel is OPERABLE; or Action b.2, the channel be declared inoperable and the applicable ACTION statement requirements of Table 3.3-3, entered. ITS 3.3.2 requires the channel to be declared inoperable and the applicable ACTION entered, consistent with CTS 3.3.2 Action b.2. This changes the CTS by eliminating the option to evaluate OPERABILITY of an ESFAS Instrument Function within 12 hours after the trip setpoint is adjusted to within limit.	3.3.2 ACTIONS	3.3.2 Action b.1

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 M03 (continued)	This is a more restrictive change because additional requirements are being imposed that were not in the CTS.		
3.3.3 M01	CTS 3.3.3.3 states, "The accident monitoring instrumentation channels shown in Table 3.3-5 shall be OPERABLE" with the ACTION stated as, "As shown in Table 3.3-5." CTS Table 3.3-5 Instrument 2 (Containment Pressure (Narrow Range)) and Instrument 15, "Containment High Range Area Radiation," specifies two total number of channels and requires a minimum of one channel to be OPERABLE. When less than the minimum number of channels is inoperable Action 36 for Containment Pressure (Narrow Range) and Action 34 for Containment High Range Area Radiation apply. These actions are the sole action for each instrument to be taken when the number of OPERABLE channels is less than the minimum number (i.e., both channels are inoperable). Table 3.3-5, Action 36, requires the channel (i.e., one of two) to be restored to OPERABLE status within 30 days or be in at least Hot Standby within the next 6 hours and in at least Hot Shutdown within the following 6 hours. Table 3.3-5, Action 34 requires, in part, to restore the channel (i.e., one of two) to OPERABLE status within 7 days or prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 14 days. When the number of OPERABLE channels is less than the total number of channels (i.e., one of two channels inoperable), no action is specified until less than the minimum number of channels is inoperable (i.e., two of two channels inoperable). ITS Table 3.3.3-1, Function 2 (Containment Pressure (Narrow Range)) and Function 10 (Containment Area Radiation (High Range)), requires two channels to be OPERABLE. ITS 3.3.3 also includes actions when one of the two channels is inoperable. ITS 3.3.3 ACTION A requires the inoperable channel to be restored to OPERABLE status within 30 days and ACTION B requires immediately initiating action in accordance with Specification 5.6.4 (i.e., prepare and submit a report to the NRC) if the channel cannot be restored to OPERABLE status within 30 days. When two Containment Pressure (Narrow Range) channels or Containment Area Radiation (High Range) channels are inoperable,	Table 3.3.3-1 Functions 2 and 10 ACTIONS C and E	Table 3.3-5 Instruments 2 and 15 Action 36

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.3 M01 (continued)	ITS 3.3.3, ACTION C, requires restoring one channel to OPERABLE status within 7 days otherwise a plant shutdown is required per ACTION E for Function 2 (CTS Table 3.3-5, Function 2) and action must be initiated in accordance with Specification 5.6.4 per ACTION F for Function 10 (CTS Table 3.3-5, Function 15). This changes the CTS by increasing the minimum number of OPERABLE containment pressure narrow range and containment high range area radiation channels from one to two; providing ACTIONS when one of two channels is inoperable; and reducing the time two containment pressure narrow range channels can be inoperable before requiring a plant shutdown. The change is designated as a more restrictive because the minimum number of OPERABLE channels required for the containment pressure narrow range and the containment area radiation high range Functions are increased from one to two.		
3.3.3 M02	CTS 3.3.3.3 Table 3.3-5 does not require OPERABLE indication channels for Condensate Storage Tank Level, Steam Generator Pressure, Emergency Diesel Generator (EDG) Output, 4 KV Bus Voltage, and Safety Injection Pump Status. These are added to the CTS and shown in ITS Table 3.3.3-1, Functions 13, 19, 20, 21, and 22, respectively. ITS Table 3.3.3-1 requires the following to be OPERABLE: two Condensate Storage Tank Level (Function 13) channels, two Steam Generator Pressure (Function 19) channels per steam generator, one EDG Output (Function 20) channel per required EDG, one 4 KV Bus Voltage (Function 21) channel per required bus, and one Safety Injection Pump Status (Function 22) channel per required pump. ITS 3.3.3, ACTION A, is applicable to cover the Condition when one or more Functions have one required channel inoperable. ITS 3.3.3, Required Action A.1 allows 30 days to restore the required channel to OPERABLE status. If this Required Action and associated Completion Time of Condition A is not met, then ITS Required Action B.1 requires the immediate initiation of the actions specified in Specification 5.6.4. ITS 3.3.3, ACTION C, is applicable to cover the Condition when one or more Functions have two required channels inoperable. ITS 3.3.3,	Table 3.3.3-1 Functions 13, 19, 20, 21, 22	

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.3 M02 (continued)	Required Action C.1, requires restoration of one channel to OPERABLE status within 7 days. If this cannot be met, then ITS 3.3.3, Condition D, must be entered, which will then require entry into Condition E where ITS 3.3.3, Required Actions E.1 and E.2, require the unit to be in MODE 3 within 6 hours and MODE 4 within 12 hours. A Note to the ACTIONS allows Separate Condition entry for each Function. EDG Output (ITS Function 20), 4 KV Bus Voltage (ITS Function 21), and Safety Injection Pump Status (ITS Function 22) do not meet the RG 1.97 requirement for redundancy. Therefore, these Functions are assigned the same Action for a single inoperable channel as the other PAM functions. The Action to restore the inoperable channel to OPERABLE status within 30 days or initiate action in accordance with Specification 5.6.4 (i.e., report to the NRC) is sufficient for these instrument Functions because acceptable alternate indications exist in the control room to confirm automatic initiation of EDGs, 4 KV bus voltage, and Safety Injection (SI) pump initiation, e.g., SI pump discharge pressure and SI flow indications. These alternate indications provide an acceptable long term alternate method to verify automatic initiation or operation until the single channel is restored to OPERABLE status. Therefore, the proposed actions provide acceptable remedial actions pursuant to 10 CFR 50.36(c)(2)(i). Also, the plant quality assurance program will ensure that the degraded condition of inoperable RG 1.97 instrument channels, which is a condition considered adverse to quality, is promptly corrected pursuant to Section XVI, “Corrective Action,” of 10 CFR 50, Appendix B. In addition, separate Condition entry is allowed for PAM instruments specified on a per steam generator basis, on a per required EDG basis, on a per required 4 KV bus basis, and on a per required SI pump basis consistent with the ISTS. SRs are applicable to each Function. These SRs include a CHANNEL CHECK for each required instrumentation channel that is normally energized (SR 3.3.3.1) and a CHANNEL CALIBRATION (SR 3.3.3.2). The SRs are consistent with the requirements for other PAM instruments and will assure the necessary quality of the instruments are maintained pursuant to 10 CFR 50.36(c)(3). The Frequency		

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.3 M02 (continued)	for SR 3.3.3.1 and 3.3.3.2 is specified in accordance with the Surveillance Frequency Control Program (SFCP) with an initial Frequency specified as 31 days and 18 months, respectively, consistent with the Frequency specified in the ISTS. This changes the CTS by adding new Functions and applicable ACTIONS and SRs. The change is designated as more restrictive because five new instrumentation functions are added to the TSs.		
Refer to DOC section in ML23151A447	**Section 3.4, Reactor Coolant System (RCS)**		
3.4.1 M01	CTS 4.2.5.4 states "…RCS flow rate shall be determined by precision heat balance after exceeding 90% RATED THERMAL POWER." ITS SR 3.4.1.4 provides a note stating, "Not required to be performed until 24 hours after ≥ 90% RTP." This changes the CTS by requiring performance of a precision heat balance to determine RCS flow rate 24 hours after reaching 90% RTP. This requirement is designated as more restrictive because a time limit to perform the SR is being prescribed.	SR 3.4.1.4	4.2.5.4
3.4.3 M01	CTS 3.4.9.1 ACTION states, in part, to restore the temperature and/or pressure to within the limit within 30 minutes and "determine that the Reactor Coolant System (RCS) remains acceptable for continued operation" with no specified time. ITS 3.4.3 ACTION A.1 and A.2 state to "Restore parameter(s) to within limits within 30 minutes, and determine RCS is acceptable for continued operation within 72 hours." This changes the CTS by requiring with no specified time up to 72 hours for performing an engineering evaluation for continued operation. This change is designated as more restrictive because the time to perform the evaluation is limited to 72 hours.	3.4.3 ACTION A.1 ACTION A.2	3.4.9.1 Action

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.5 M01	CTS 3.4.1.2 states that all reactor coolant loops shall be OPERABLE and in operation when the RTBs are closed, and two reactor coolant loops OPERABLE with at least one reactor coolant pump in operation when the RTBs are open. This requirement is modified by footnote * that states all reactor coolant pumps may be deenergized for up to 1 hour under the conditions specified therein. ITS 3.4.5 contains the same allowance but limits the use of the 1-hour exception to once per 8-hour period. This changes the CTS by modifying the 1-hour allowance that all reactor coolant pumps may be de-energized and limits the usage of the allowance to once per 8-hour period. This change is designated as more restrictive because it limits the allowance to 1 hour per 8-hour period, a restriction that does not currently exist in CTS.	3.4.5	3.4.1.2
3.4.5 M02	CTS 3.4.1.2 Action a states "With less than the above required reactor coolant loops OPERABLE, restore the required loops to OPERABLE status within 72 hours." ITS 3.4.5 ACTION A also requires, with one required RCS loop inoperable, restoring required RCS loop to OPERABLE status within 72 hours. In addition, ITS 3.4.5 ACTION D requires, with two required RCS loops (i.e., three RCS loops) inoperable or no RCS loops in operation to immediately: 1) place the Rod Control System in a condition incapable of rod withdrawal, 2) suspend operations that would cause introduction of coolant into the RCS with boron concentration less than required to meet SDM of LCO 3.1.1, and 3) initiate action to restore one RCS loop to OPERABLE status and operation. This changes the CTS by requiring additional actions when two required RCS loops are inoperable This change is designated as more restrictive because it requires additional actions that must be taken when two required RCS loops are inoperable which is not in CTS.	3.4.5 ACTION D	3.4.1.2 Action a

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.6 M01	CTS LCO 3.4.1.3.b states, in part, that at least two coolant loops shall be OPERABLE and at least one must be in operation. This requirement is modified by a Footnote* that states, in part, that all Reactor Coolant Pumps (RCPs) and RHR pumps may be de-energized for up to 1 hour. ITS 3.4.6 contains the same allowance but limits the use of the 1-hour exception to once per 8-hour period. This changes the CTS to limit the use of the 1-hour exception to once per 8-hour period. This change is designated as more restrictive because it limits an allowance to 1 hour per 8-hour period that does not currently exist in CTS.	3.4.6	3.4.1.3.b
3.4.6 M02	CTS 4.4.1.3.1 states, in part, the required RCP(s), if not in operation, shall be determined OPERABLE by verifying correct breaker alignment and indicated power availability. ITS SR 3.4.6.3 requires verification that correct breaker alignment and indicated power are available to the pump not in operation. ITS LCO 3.4.6 allows a combination of RCPs and RHR pumps. This changes the CTS by requiring verification of correct breaker alignment and indicated power availability on required RHR pumps that are not in operation. This change is designated as more restrictive because it requires performance of Surveillance on RHR pumps in addition to RCS pumps.	SR 3.4.6.3	4.4.1.3.1
3.4.6 M03	CTS 3.4.1.3, Action b, is associated with conditions where no reactor coolant loop is in operation. ITS 3.4.6, Action B, contains two conditions: 1) two required loops inoperable or, 2) required loop not in operation. This changes the CTS by adding the Condition “two required loops inoperable” to the CTS Condition “no required loop in operation.” This chance is designated as more restrictive because it requires an additional condition under which the actions must be taken.	3.4.6 ACTION B	3.4.1.3

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.7 M01	CTS 3.4.1.4 states that two RHR loops shall be OPERABLE and at least one RHR loop must be in operation. This requirement is modified by Footnote* that states, in part, that all RHR pumps may be de-energized for up to 1 hour. ITS 3.4.7 Note 1 contains the same allowance but limits the use of the 1-hour exception to once per 8 hours. This changes the CTS by limiting the use of the 1-hour exception to once per 8 hours. This change is designated as more restrictive because it limits the time the plant can be in MODE 5 with RCS loops filled with no RHR pumps in operation to 1 hour per 8-hour period.	3.4.7 Note 1	3.4.1.4
3.4.7 M02	ITS Surveillance Requirement SR 3.4.7.3 requires verification that correct breaker alignment and indicated power are available to each required RHR pump. A Note further explains that the Surveillance is not required to be performed until 24 hours after a required pump is not in operation. This Surveillance is not required by the CTS. This changes the CTS by requiring verification of correct breaker alignment and indicated power availability on required RHR pumps that are not in operation. This change is designated as more restrictive because it adds a Surveillance Requirement to the CTS.	SR 3.4.7.3	None
3.4.8 M01	CTS 3.4.1.4.2 Footnote ** contains an allowance for the RHR pumps to be de-energized for up to one hour provided 1) no operations are permitted that would cause introduction of coolant into the RCS with boron concentration less than required to meet SHUTDOWN MARGIN (SDM) of LCO 3.1.1.2 and 2) core outlet temperature is maintained at least 10°F below saturation temperature. ITS LCO 3.4.8 Note 1 allows all RHR pumps to be removed from operation for ≤ 15 minutes when switching from one loop to the other provided the core outlet temperature is maintained at least 10°F below saturation temperature, no operations are permitted that would cause introduction of coolant into the RCS with boron concentration less than required to meet SDM of LCO 3.1.1.2, and no draining operations to further reduce the RCS water volume are permitted. This changes the CTS 3.4.1.4.2 Footnote ** by restricting the allowance to only during	LCO 3.4.8 Note 1	3.4.1.4.2

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.8 M01 (continued)	pump switching operations (see M02), reducing the time the pump can be removed from operation to 15 minutes (see M02), and adds a restriction that no draining operations are permitted to further reduce the RCS water volume. This change is more restrictive because it imposes additional restrictions to the allowance for RHR loops to be removed from operation not currently in CTS.		
3.4.8 M02	CTS 3.4.1.4.2 Footnote ** contains an allowance for the RHR pumps to be de-energized for up to one hour. ITS LCO 3.4.8 Note 1 allows all RHR pumps to be removed from operation for ≤ 15 minutes only when switching from one loop to the other, and also requires that no draining operations to further reduce the RCS water volume are permitted (part c). This changes the CTS by reducing the time allowed for the RHR pump to be de-energized from 1 hour to 15 minutes, restricts the allowance to only during pump switching operations, and adds a restriction that no draining operations are permitted to further reduce the RCS water volume (see DOC 3.4.8 M01). This change is more restrictive because it reduces the time a RHR loop may be out of service and adds an additional restriction not in CTS.	LCO 3.4.8 Note 1	3.4.1.4.2
3.4.8 M03	ITS SR 3.4.8.2 requires verification that correct breaker alignment and indicated power are available to each required RHR pump. A Note further explains that the Surveillance is not required to be performed until 24 hours after a required RHR pump is not in operation. This Surveillance is not required by the CTS. This changes the CTS by requiring verification of correct breaker alignment and indicated power availability on required RHR pumps that are not in operation. This change is designated as more restrictive because it adds a Surveillance Requirement to the CTS.	SR 3.4.8.2	None

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.8 M04	CTS 3.4.1.4.2 states, in part, that “core outlet temperature is maintained at least 10°F below saturation temperature.” ITS 3.4.8 states “The core outlet temperature is maintained > 10°F below saturation temperature.” This changes the CTS by replacing “at least”” (equivalent to greater than or equal to) with “>”. This change is designated as more restrictive, because it replaces "at least" equivalent to greater than or equal to (≥) with greater than (>).	3.4.8 Note 1	3.4.1.4.2
3.4.9 M01	CTS 3.4.3 does not contain an explicit requirement to verify two groups of pressurizer heaters are capable of being supplied by emergency power. ITS SR 3.4.9.3 requires verifying the pressurizer heaters are capable of being powered from an emergency power supply. This changes the CTS by adding a surveillance. This change is designated as more restrictive because it adds a SR to the CTS.	SR 3.4.9.3	None
3.4.10 M01	CTS 3.4.2.1 requires a minimum of one pressurizer safety valve to be OPERABLE during MODES 4 and 5. Thus, one or two of the three safety valves are allowed to be inoperable indefinitely in MODES 4 and 5. ITS LCO 3.4.10 requires three pressurizer safety valves to be OPERABLE during MODE 4 with all RCS cold leg temperatures > 275°F. With one of the three pressurizer safety valves inoperable, ITS 3.4.10 ACTION A states that the valve must be restored to OPERABLE status within 15 minutes. If this cannot be met, ITS 3.4.10 ACTION B requires the unit to be in MODE 3 in 6 hours and MODE 4 with any RCS cold leg temperature < 275°F in 24 hours. In addition, ITS 3.4.10 ACTION B requires these same actions to place the unit outside of the Applicability of the Specification when two of the three pressurizer safety valves are inoperable. This changes the CTS by requiring three safety valves to be OPERABLE and by specifying new Required Actions for when one or two of the three valves are inoperable. The change to the Applicability is discussed in DOC L02. The change to the remainder of the CTS 3.4.2 Actions is discussed in DOC L03.	LCO 3.4.10	3.4.2.1

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.10 M01 (continued)	This change is designated as more restrictive as it increases the required number of pressurizer safety valves from one to three and provides explicit Required Actions for when one or two of the three safety valves are inoperable.		
3.4.11 M01	CTS 3.4.4 does not contain an explicit requirement to perform a complete cycle of each PORV in MODES 1 and 2. ITS SR 3.4.11.2 requires a complete cycle of each PORV in MODES 1 and 2. This changes the CTS by adding the ITS requirement of SR 3.4.11.2. This change is designated as more restrictive because it adds a SR to the CTS.	SR 3.4.11.2	None
3.4.12 M01	CTS 4.4.9.3.1.a requires, in part, each PORV be demonstrated OPERABLE by the performance of an ANALOG CHANNEL OPERATIONAL TEST. ITS SR 3.4.12.6 requires performance of a CHANNEL OPERATIONAL TEST (COT) to demonstrate Power Operated Relief Valve (PORV) OPERABILITY. This changes the CTS by changing the ANALOG CHANNEL OPERATIONAL TEST requirements to a COT. This change is designated as more restrictive because it imposes additional requirements on testing than in CTS.	SR 3.4.12.6	4.4.9.3.1.a
3.4.12 M02	CTS 3.4.9.3, ACTION a. states that with the high-pressure safety injection flow paths to the RCS unisolated, restore isolation of these flow paths within 4 hours. ITS 3.4.12 ACTION A. states that with one or more high pressure safety injection flow paths to the RCS not isolated to isolate all high-pressure safety injection flow paths to the RCS within 4 hours. In addition, ITS 3.4.12 ACTION D states, in part, that if the Required Action and associated Completion Time of Condition A is not met to depressurize the RCS and establish RCS vent of ≥ 2.20 square inches within 24 hours. This changes the CTS by providing a Required Action to establish an RCS vent instead of entering ITS 3.0.3 and proceeding to shut down the unit until in MODE 5 without requiring an RCS vent. This change is designated as more restrictive because it adds a Required Action to CTS.	3.4.12 ACTION A ACTION D	3.4.9.3 Action a

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.14 M01	CTS SR 4.5.2.e.1 requires, in MODES 1, 2, and 3, verification of the proper operation of the RHR System autoclosure interlock by verifying automatic isolation and interlock action of the RHR System from RCS when RCS pressure (actual or simulated) is greater than or equal to 525 psig, and that the interlocks prevent opening the RHR System isolation valves when RCS pressure (actual or simulated) is greater than or equal to 525 psig. ITS SR 3.4.14.2 and SR 3.4.14.3 provide similar requirements. However, ITS requires the RHR System autoclosure interlock functions and associated Surveillances to be applicable in MODES 1, 2, 3, and 4. This changes the CTS by expanding the applicability of the RHR System autoclosure interlock functions to include MODE 4 conditions. This change is designated as more restrictive because it expands CTS Applicability for the RHR System autoclosure interlock.	SR 3.4.14.2 SR 3.4.14.3	4.5.2.e.1
3.4.15 M01	CTS 3.4.6.1 requires, in part, the containment atmosphere radioactivity monitor to be demonstrated OPERABLE by the performance of a CHANNEL CHECK, CHANNEL CALIBRATION, and ANALOG CHANNEL OPERATIONAL TEST. ITS Surveillance Requirement (SR) 3.4.15.2 requires the performance of a CHANNEL OPERATIONAL TEST (COT). This changes the CTS by changing the ANALOG CHANNEL OPERATIONAL TEST requirements to a COT. This change is designated as more restrictive because it imposes additional requirements on testing than in CTS.	SR 3.4.15.2	3.4.6.1
3.4.15 M02	CTS 3.4.6.1 ACTION b does not contain a requirement to perform an RCS water inventory balance when the Containment Sump Monitor is inoperable. ITS 3.4.15 Required Action A.1 requires the performance of SR 3.4.13.1 once per 24 hours. This changes the CTS by adding the requirement to perform ITS SR 3.4.13.1 once per 24 hours. This change is designated as more restrictive because it adds an additional requirement to CTS.	3.4.15 Required Action A.1	3.4.6.1 Action b

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.15 M03	CTS 3.4.6.1 does not contain an ACTION when the containment atmosphere gaseous radiation monitor is the only OPERABLE monitor. In this condition, ISTS 3.4.15 ACTION D (PTN ITS 3.4.15 ACTION C) requires that grab samples of the containment atmosphere be analyzed once every 12 hours and that the containment sump monitor be returned to an OPERABLE status within 7 days. This changes the CTS by adding the Required Actions of ITS 3.4.15 ACTION C. This change is designated as more restrictive because it adds an additional requirement to CTS.	3.4.15 ACTION C	3.4.6.1
3.4.16 M01	CTS SR 4.4.8 states "Between 2 and 6 hours after a THERMAL POWER change of exceeding 15% RTP within a 1 hour period." Exceeding means greater than. ITS SR 3.4.16.2 states "Between 2 and 6 hours after a THERMAL POWER change of ≥ 15% RTP within a 1 hour period." This changes the CTS by requiring a sample to be taken following a power change of 15% RATED THERMAL POWER (RTP) instead of only when an RTP change is greater than 15%. This change is designated as more restrictive since it requires a DEI-131 sample taken after a power increase of 15% versus the CTS requirement of greater than 15% RTP.	SR 3.4.16.2	4.4.8

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
Refer to DOC section in ML23151A448	**Section 3.5, Emergency Core Cooling Systems (ECCS)**		
3.5.1 M01	Not used.	N/A	N/A
3.5.1 M02	CTS SR 4.5.1.1.a.1 states, "Verifying the borated water volume in each accumulator is between 6520 and 6820 gallons," and ITS SR 3.5.1.2 states "Verify borated water volume in each accumulator is ≥ 6520 gallons and ≤ 6820 gallons." This changes the CTS by including the outer limits in the verification (by adding equal values). This change is designated as more restrictive because more stringent requirements are being applied in the ITS than were applied in the CTS.	SR 3.5.1.2	4.5.1.1.a.1
3.5.1 M03	CTS SR 4.5.1.1.a.2 states, "Verifying the nitrogen cover pressure in each accumulator is between 600 and 675 psig," and ITS SR 3.5.1.3 states "Verify nitrogen cover pressure in each accumulator is ≥ 600 psig and ≤ 675 psig." This changes the CTS by including the outer limits in the verification (by adding equal values). This change is designated as more restrictive because more stringent requirements are being applied in the ITS than were applied in the CTS.	SR 3.5.1.3	4.5.1.1.a.2
3.5.1 M04	CTS SR 4.5.1.1.b states "by verifying the boron concentration of the solution in the water-filled accumulator is between 2300 and 2600 ppm," and ITS SR 3.5.1.4 states "Verify boron concentration in each accumulator is ≥ 2300 ppm and ≤ 2600 ppm." This changes the CTS by including the outer limits in the verification (by adding equal values). This change is designated as more restrictive because more stringent requirements are being applied in the ITS than were applied in the CTS.	SR 3.5.1.4	4.5.1.1.b

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5.2 M01	CTS SR 4.5.2.a requires verifying certain valves are in their indicated position with power to the valve operators removed. ITS 3.5.2.1 also requires verifying the valves are in their listed position with power to the valve operator removed; however, the ITS adds the high head safety injection header crosstie valves. This changes the CTS by adding additional valves that have to be verified in their indicated position with power to the valves removed. This change is designated as more restrictive because additional surveillance requirements will be required.	3.5.2.1	4.5.2.a
3.5.3 M01	ITS 3.5.3 ACTIONS contains Note that states LCO 3.0.4.a is not applicable when entering MODE 4. CTS 3.5.3 does not contain this Note. This changes the CTS by adding the Note that makes exemption to LCO 3.0.4.a. This change is designated as more restrictive because it removes allowances provided by LCO 3.0.4.a from CTS.	3.5.3 ACTIONS Note	3.5.3

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
Refer to DOC section in ML23151A449	**Section 3.6, Containment Systems**		
3.6.2 M01	CTS 3.6.1.3 ACTION a requires, in part, to maintain at least the OPERABLE air lock door closed when one containment air lock door is inoperable. CTS 3.6.1.3 ACTION b requires, in part, to maintain at least one air lock door closed when the containment air lock is inoperable. ITS 3.6.2 ACTIONS A and C require similar actions (Required Action A.1 and C.2, respectively), and require verifying the door is closed in the affected air lock within 1 hour. This changes the CTS by adding a new Completion Time. This change is considered more restrictive because it provides a new Completion Time not in CTS.	3.6.2 Required Action A.1 Required Action C.2	3.6.1.3 Action a Action b
3.6.2 M02	CTS 3.6.1.3 ACTION b requires maintaining at least one air lock door closed and restoration of an inoperable air lock within 24 hours. ITS 3.6.2 ACTION C requires an additional Required Action. When one or more containment air locks are inoperable for reasons other than Condition A or B, ITS 3.6.2 Required Action C.1 requires initiation of action to evaluate overall containment leakage rate per LCO 3.6.1, immediately. This changes the CTS by adding a new Required Action. This change is considered more restrictive because it provides a new Required Action not in CTS.	3.6.2 Required Action C.1	3.6.1.3 Action b

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
Refer to DOC section in ML23151A450	**Section 3.7, Plant Systems**		
3.7.2 M01	ITS SR 3.7.2.2 states, in part, "Verify each MSIV actuates to the isolation position on an actual or simulated actuation signal." The CTS does not contain this Surveillance Requirement. This changes the CTS by adding the ITS requirement of SR 3.7.2.2. This change is designated as more restrictive because it adds a new SR to the CTS.	SR 3.7.2.2	None
3.7.4 M01	CTS Table 4.7-1, Item 2, requires the secondary coolant system DOSE EQUIVALENT I-131 sampling frequency to be once per 31 days, whenever the gross activity determination indicates iodine concentration greater than 10% of the allowable limit. CTS Table 4.7-1, Item 2, allows the sampling frequency for the secondary coolant system DOSE EQUIVALENT I-131 to be extended to once per 6 months, whenever the gross activity determination indicates iodine concentrations below 10% of the allowable limits. ITS SR 3.7.4.1 does not provide this extended period for determining secondary coolant system DOSE EQUIVALENT I-131 and requires verification of secondary coolant system specific activity every 31 days. This changes the CTS by deleting the allowance to perform less frequent secondary coolant system specific activity analyses when gross activity determination indicates iodine concentrations below 10% of the allowable limits. This change is designated as more restrictive because Surveillances will be performed more frequently under the ITS than under the CTS.	SR 3.7.4.1	4.7.1.4 Table 4.7-1, Item 2
3.7.7 M01	CTS 3.7.2 Action c requires that with less than two CCW heat exchangers OPERABLE, restore two heat exchangers to OPERABLE status within 1 hour or be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. ITS 3.7.7 ACTION C requires that with two CCW trains inoperable to enter LCO 3.0.3 immediately, which includes the condition of less than two CCW heat exchanges OPERABLE. This changes the CTS by explicitly	3.7.7 ACTION C	3.7.2 Action c

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.7 M01 (continued)	stating when entry into LCO 3.0.3 is required which results in the additional requirement to be MODE 4 within a specified time period for the condition with less than two OPERABLE CCW heat exchangers. This change is designated as more restrictive because the remedial actions are more stringent than in CTS.		
3.7.10 M01	CTS 3.7.5, Actions a.4, one recirculation damper inoperable and a.6, an inoperable damper in the normal outside air intake requires, in part, to place the CREVS in the recirculation mode. ITS 3.7.10, ACTION G, requires that with two CREVS trains inoperable due to normal outside air intake isolated to immediately place one CREVS train in the recirculation mode. If ITS 3.7.10, Required Action G.1, cannot be performed within its associated Completion Time, ITS 3.7.10, ACTION I, will apply when the unit is in MODE 1, 2, 3, or 4 and ITS 3.7.10, ACTION K, will apply when the unit is in MODE 5 or 6 or during movement of irradiated fuel assemblies. This changes the CTS by replacing specific action requirements associated with an inoperable recirculation or intake damper in the CREVS with a requirement to place the CREVS in the recirculation mode if both CREVS trains are inoperable due to normal outside air intake isolated. This change is designated as more restrictive because the CREVS will be placed in the recirculation mode sooner in ITS (immediately) than in CTS (7 days).	3.7.10 ACTION G	3.7.5 Action a.4 Action a.6
3.7.10 M02	CTS 3.7.5 does not contain an Action addressing two or more inoperable AHUs in MODE 5, or 6, or during movement of irradiated fuel assemblies. Therefore, the first condition described in ITS 3.7.10, ACTION K, is modified to address this configuration. This changes the CTS by providing specific action requirements associated with two or more inoperable AHUs inoperable in MODE 5, or 6, or during movement of irradiated fuel assemblies. This change is designated as more restrictive because the movement of irradiated fuel assemblies will now be suspended upon the loss of two or more AHUs in MODE 5, or 6, or during movement of irradiated fuel assemblies.	3.7.10 ACTION K	3.7.5 Action b

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.14 M01	ITS Surveillance Requirement (SR) 3.7.14.1 verifies by administrative means the fuel assemblies stored in Regions I and II are stored in accordance with the requirements of Figures 3.7.14-1 through Figure 3.7.14-3 and Tables 3.7.14-1 through 3.7.14.3 with credited for burnup and cooling time taken in determining acceptable placement locations for spent fuel in the two-region spent fuel racks. The CTS do not contain this SR. This changes the CTS by adding a new SR to TSs. This change is designated as more restrictive because an SR is being added to the ITS that was not in the CTS.	SR 3.7.14.1	None
Refer to DOC section in ML23151A451	**Section 3.8, Electrical Power Systems**		
3.8.1 M01	CTS 3.8.1.1, ACTION a, provides actions when one of the two startup transformers or an associated circuit is inoperable. CTS, ACTIONS a.3, a.4, and a.5, provide different actions based on the unit's MODE and if the inoperable startup transformer and associated circuit is associated with the opposite unit. If the inoperability is associated with the unit's startup transformer or associated circuits and the unit is in MODE 1, CTS allows 30 days to restore the inoperable circuit if THERMAL POWER is reduced to ≤ 30% RATED THERMAL POWER within 24 hours or restore the inoperable circuit within the next 48 hours or in accordance with the RICT Program if THERMAL POWER is not reduced. If the inoperability is associated with the opposite unit's startup transformer or associated circuits, CTS also allows 30 days to restore the inoperable circuit. If the inoperability is associated with the unit's startup transformer or associated circuit and the unit is in MODE 2, 3, or 4, CTS allows a maximum of 24 hours to restore the inoperable circuit or in accordance with the RICT Program. ITS provides one ACTION for an inoperable circuit if it is associated with the unit (including the circuit between the opposite unit startup transformer and the associated unit's Train A 4.16 kV bus) and one ACTION if the circuit inoperability is associated with the opposite unit 4.16 kV buses. ITS 3.8.1, Required Action A.3, requires that with one-unit offsite circuit inoperable, to restore the offsite	3.8.1	3.8.1.1 Action a

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 M01 (continued)	circuit to OPERABLE status within 72 hours or in accordance with the RICT Program. This changes the CTS actions for an inoperable circuit to the unit's 4.16 kV buses, whether from the unit startup transformer or the opposite unit startup transformer from 30 days to 72 hours or in accordance with the Risk Informed Program. This change is designated as more restrictive because the Completion Time for restoring an inoperable startup transformer and associated circuits if associated with the unit (including the circuit between the opposite unit startup transformer and the associated unit's Train A 4.16 kV bus) without a risk assessment has been reduced.		
3.8.1 M02	CTS 4.8.1.1.2.a.5 requires each EDG to be synchronized, loaded, and operated for at least 60 minutes. ITS SR 3.8.1.2 requires the same test; however, an additional Note has been added that places a restriction on the test. ITS SR 3.8.1.2 Note 3 modifies the CTS requirements by stating that this Surveillance shall be conducted on only one EDG at a time. This changes the CTS by adding a restriction when performing this test. This change is designated as more restrictive because an explicit restriction is added to the EDG load test.	3.8.1 SR 3.8.1.2 Note 3	4.8.1.1.2.a.5
3.8.1 M03	CTS 4.8.1.1.2.a.5 requires each EDG to be synchronized, loaded, and operated for at least 60 minutes. ITS SR 3.8.1.2 requires the same test; however, an additional Note has been added that places a restriction on the test. ITS SR 3.8.1.2 Note 4 modifies the CTS requirements by stating that the SR shall be preceded by and immediately follow, without a shutdown of the EDG, a successful performance of ITS SR 3.8.1.6 (timed start of the EDG). This changes the CTS by adding a restriction when performing this test. This change is designated as more restrictive because an explicit restriction is added to the EDG load test.	SR 3.8.1.2 SR 3.8.1.2 Note 4	4.8.1.1.2.a.5

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 M04	CTS 4.8.1.1.2.g.2 requires the testing of each EDG with a load rejection greater than or equal to 392 kW. CTS 4.8.1.1.2.g.3 requires the testing of each EDG with a load rejection of 2500 kW. CTS 4.8.1.1.2.g.7 requires verifying the diesel generator operates for at least 24 hours under specific loaded conditions. These Surveillances do not specify that the testing be performed at a specific power factor. ITS SR 3.8.1.8 requires the verification that each EDG can reject a load equal to or greater than its associated single largest post-accident load. ITS SR 3.8.1.9 requires the verification that each EDG can reject a load of ≥ 2500 kW (Unit 3), 2874 kW (Unit 4). ITS SR 3.8.1.13 requires verifying each EDG operates for ≥ 24 hours within specified load requirements. These ITS SRs are modified by a Note specifying a power factor limitation if the EDG is synchronized with offsite power. The Note is Note 2 for ITS SRs 3.8.1.8, 3.8.1.9, and SR 3.8.1.13. These Notes state that if the Surveillance is performed with the EDG synchronized with offsite power, it shall be performed at a power factor less than or equal to the power factor of the associated single largest post-accident load or less than or equal to that determined by the diesel loading analysis. However, if grid conditions do not permit, the power factor limit is not required to be met. Under this condition the power factor shall be maintained as close to the limit as practicable. This changes the CTS requirement by specifying a power factor if the testing is conducted when synchronized with offsite power. This change is designated as more restrictive because the testing required by the CTS does not currently contain these limitations.	SR 3.8.1.8 SR 3.8.1.9 SR 3.8.1.13	4.8.1.1.2.g.2
3.8.1 M05	CTS 4.8.1.1.2.g.5, the Engineered Safety Feature (ESF) actuation test (without a loss of power), requires the EDG to start within 15 seconds and operate on standby for greater than or equal to 5 minutes maintaining frequency and voltage within specifications. ITS SR 3.8.1.11 requires the verification that each EDG auto-starts from a standby condition, that permanently connected loads remain energized from the offsite power system, and that emergency loads are auto-connected through the time delay relays, where applicable, from the offsite power system. This changes the CTS by adding additional performance requirements for the ESF actuation test (without a loss of power).	SR 3.8.1.11	4.8.1.1.2.g.5

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 M05 (continued)	This change is designated as more restrictive because additional acceptance criteria have been added to the CTS.		
3.8.1 M06	CTS 3.8.1.1.b requires that three separate and independent diesel generators are OPERABLE. The * footnote to CTS 3.8.1.1.b states that, "Whenever one or more of the four EDGs is out-of-service, ensure compliance with the EDG requirements specified in Specifications 3.5.2 and 3.8.2.1." ITS LCO 3.8.1.b requires two emergency diesel generators (EDGs) capable of supplying the onsite Class 1E power distribution trains. ITS LCO 3.8.1.d requires the required opposite unit EDG(s) capable of supplying power to support equipment required by LCO 3.5.2, LCO 3.7.10, LCO 3.7.11, and LCO 3.8.4. In addition, the *footnote is not included in the ITS. This changes the CTS by requiring both opposite unit EDGs when both EDGs are needed to support loads required by other Specifications. This change is designated as more restrictive because additional LCO requirements are being applied in the ITS than were applied in the CTS.	LCO 3.8.1.b	3.8.1.1.b
3.8.1 M07	CTS 3.8.1.1.b requires three separate and independent diesel generators to be OPERABLE. CTS 3.8.1.1 Action d.2 requires, with one diesel generator inoperable (i.e., one of the three required EDGs inoperable), verifying at least two Safety Injection pumps are OPERABLE and capable of being powered from their associated OPERABLE diesel generators. CTS 3.8.2.1 requires specific DC battery banks to be OPERABLE with one of two associated full capacity chargers OPERABLE and powered by their associated motor control center (MCC), and the associated EDG to be OPERABLE. CTS 3.8.2.1, Action a, requires restoring EDG capability to the required battery chargers within 72 hours or in accordance with the RICT Program when one or more required battery chargers are not capable of being powered from its associated OPERABLE EDG. ITS LCO 3.8.1.b requires two unit EDGs to be OPERABLE and capable of supplying the onsite Class 1E power distribution subsystem(s) and ITS LCO 3.8.1.d requires one or both opposite unit EDG(s) to be OPERABLE and capable of supplying power to equipment as required by LCO 3.5.2, LCO 3.7.10, LCO	LCO 3.8.1 ACTION F	3.8.1.1 Action d.2 3.8.2.1 Action a

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 M07 (continued)	3.7.11, and LCO 3.8.4 (Refer to DOC M06 for discussion of change to CTS LCO 3.8.1.1). ITS 3.8.1, ACTION F, requires, when one unit EDG and one required opposite unit EDG are inoperable, or both required opposite unit EDGs are inoperable, verifying the following equipment shared between units is capable of being powered from OPERABLE EDGs: two high head safety injection (HHSI) subsystems; two control room air handling units (AHUs); one CREVS train; and one CREATCS train (Refer to DOC A14 for discussion of change related to Required Action F.1). Required Action F.5 requires restoring one required EDG to OPERABLE status within 72 hours or in accordance with the RICT Program. This changes the CTS by requiring verification within 2 hours that minimum equipment shared between units needed to support the ESF Functions are supported by an OPERABLE EDG. This change is considered more restrictive because additional actions are added when a specific combination of two required EDGs are inoperable.		
3.8.2 M01	CTS 3.8.1.2 is applicable during MODES 5 and 6. ITS 3.8.2 is applicable in MODES 5 and 6, and during the movement of irradiated fuel assemblies. In addition, a Note has been added to the ACTIONS of ITS 3.8.2 that states LCO 3.0.3 is not applicable. This changes the CTS by requiring the AC Sources to be OPERABLE under more conditions than is currently required. This change is designated as more restrictive because the Applicability of the Specification has been expanded.	3.8.2 Applicability ACTIONS Note	3.8.1.2 Applicability
3.8.2 M02	The CTS 3.8.1.2 Action requires, in part, that with less than the minimum required A.C. electrical power sources OPERABLE that when in MODE 5 with the reactor coolant loops not filled, or in MODE 6 with the water level less than 23 feet above the reactor vessel flange to increase RCS inventory as soon as possible. ITS 3.8.2 Required Actions A.2.3 and B.3 require the immediate initiation of action to restore the required AC Sources to OPERABLE status. This changes the CTS by expanding the Action requirement to restore the inoperable AC Sources to OPERABLE status regardless of fill status of the reactor coolant loops or the water level above the top of reactor vessel flange.	3.8.2 Required Action A.2.3 Required Action B.3	3.8.1.2 Action

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.2 M02 (continued)	This change is designated as more restrictive because the CTS Required Actions are expanded to apply to all plant configurations in MODES 5 and 6 and during movement of irradiated fuel assemblies.		
3.8.3 M01	CTS 3.8.1.1.b.1)d provides lube oil storage requirements for the Unit 3 EDGs and CTS 4.8.1.1.2.a.3 provides an SR to verify the lubricating oil inventory in storage for Unit 3 EDGs. The CTS does not provide EDG total lube oil inventory requirements for the Unit 3 EDGs and Unit 4 EDGs, or the lube oil contained in the EDG lube oil sump. ITS LCO 3.8.3, in part, requires the lube oil inventory to be within limits for each required EDG that includes the lube oil in the EDG lube oil sump. The Applicability for this requirement is when the associated EDG is required to be OPERABLE. ITS SR 3.8.3.2 requires a verification that the lube oil inventory is greater than a 7day supply for each EDG, including the lube oil in storage and the lube oil in the EDG sump. ITS 3.8.3, ACTION B and ACTION F, provide Actions if the limit of ITS SR 3.8.3.2 is not met. ITS 3.8.3, ACTION F, provides similar requirements as are in CTS, declaring the EDG inoperable immediately if not within limits. ITS 3.8.3, ACTION B, provides a Required Action to restore the lube oil inventory to greater than or equal to the 7-day supply if there is greater than or equal to a 6-day supply. This changes the CTS by adding a lube oil inventory requirement for the EDGs that includes both the inventory in the EDG's sump and the inventory in storage along with an appropriate ACTION and SR. This change is considered more restrictive because it adds a new requirement to maintain a 7-day lube oil inventory for Unit 4 EDGs and requires the verification of the total inventory of lube oil for Unit 3 EDGs.	3.8.3 ACTION B SR 3.8.3.2	3.8.1.1.b.1)d 4.8.1.1.2.a.3

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.3 M02	The CTS does not provide any starting air receiver pressure requirements. ITS LCO 3.8.3, in part, requires the required starting air receiver pressure to be within limits for each required EDG. The Applicability for this requirement is when the associated EDG is required to be OPERABLE. ITS SR 3.8.3.4 requires verification that the required starting air receiver pressure is ≥ the 5 start air pressure for each EDG. ITS 3.8.3 ACTION E provides an ACTION if the limit of ITS SR 3.8.3.4 is not met. This changes the CTS by adding a starting air receiver pressure requirement, with an appropriate ACTION and SR. This change is considered more restrictive because it adds a new requirement to maintain a starting air receiver pressure for each EDG.	3.8.3 ACTION E SR 3.8.3.4	None
3.8.3 M03	CTS LCO 3.8.1.1.b.1)b) requires, in part, a common Fuel Storage System containing a minimum volume of 38,000 gallons of fuel.** Footnote ** modifies this requirement stating, in part, that a temporary Class III fuel storage system containing a minimum volume of 38, 000 gallons of fuel oil may be used for up to 10 days during the performance of Surveillance Requirement 4.8.1.1.2i.1 [fuel oil storge tank cleaning] for the Unit 3 storage tank while Unit 3 is in Modes 5, 6, or defueled. If the diesel fuel oil storage tank is not returned to service within 10 days, Technical Specification 3.8.1.1 Action b and 3.8.1.2 Action apply to Unit 4 and Unit 3 respectively. ITS LCO 3.8.3 Note states that the Unit 3 fuel oil storage subsystem may be considered within limits for 10 days when a temporary Class III fuel oil storage subsystem containing greater than or equal to a 7-day supply of fuel oil is used during Unit 3 fuel oil storage tank cleaning while Unit 3 is in MODE 5, 6, or defueled. This changes the CTS by removing the direction to specific Required Actions if the temporary subsystem is used longer than 10 days. The change is designated as more restrictive because it removes an allowance to no perform Required Actions.	3.8.3 LCO Note	3.8.1.1.b.1)b

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.5 M01	CTS 3.8.2.2 is applicable in MODES 5 and 6. ITS 3.8.5 is applicable in MODES 5 and 6 and during movement of irradiated fuel assemblies. A Note has been added to the ACTIONS which states that LCO 3.0.3 is not applicable. This changes the CTS by adding the Applicability of during movement of irradiated fuel assemblies and adds the Note to the ACTIONS stating that LCO 3.0.3 is not applicable. This change is designated as more restrictive because the ITS requires the equipment to be OPERABLE during movement of irradiated fuel assemblies both inside and outside of the containment, not only in MODES 5 and 6.	3.8.5 Applicability ACTIONS Note	3.8.2.2 Applicability
3.8.7 M01	CTS 4.8.3.1 requires that specified busses shall be determined energized in the required manner by verifying correct breaker alignment and indicated voltage on the busses. ITS Surveillance Requirement (SR) 3.8.7.1 requires the verification of correct inverter voltage, frequency, and alignments to required AC vital buses. This changes the CTS by requiring the specific verification of the inverter voltage, frequency, and alignment. This change is designated as more restrictive because the ITS requires verification of the correct inverter voltage, frequency, and alignment where the CTS does not provide explicit requirements for the inverter.	S.R. 3.8.7.1	4.8.3.1
3.8.8 M01	CTS 3.8.3.2 is applicable in MODES 5 and 6. ITS LCO 3.8.8 is applicable in MODES 5 and 6 and during movement of irradiated fuel assemblies. A Note has been added to the ACTIONS which states that LCO 3.0.3 is not applicable. This changes the CTS by adding the Applicability of during movement of irradiated fuel assemblies and adds the Note to the ACTIONS stating that LCO 3.0.3 is not applicable. This change is designated as more restrictive because the ITS requires the equipment to be OPERABLE during movement of irradiated fuel assemblies both inside and outside of the containment, not only in MODES 5 and 6.	LCO 3.8.8 Applicability ACTIONS Note	3.8.3.2 Applicability

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.8 M02	CTS 4.8.3.2 requires that specified busses shall be determined energized in the required manner by verifying correct breaker alignment and indicated voltage on the busses. ITS Surveillance Requirement (SR) 3.8.8.1 requires the verification of correct inverter voltage, frequency, and alignments to required AC vital buses. This changes the CTS by requiring the specific verification of the inverter voltage, frequency, and alignment. This change is designated as more restrictive because the ITS requires verification of the correct inverter voltage, frequency, and alignment where the CTS does not provide explicit requirements.	SR 3.8.8.1	4.8.3.2
3.8.9 M01	CTS 3.8.3.1 requires electrical buses to be energized in the specific manner with tie breakers open between redundant buses within the unit and between the buses of Units 3 and 4. CTS 3.8.3.1.c requires one opposite unit train of AC buses and lists the specific 4160 V bus, 480 V load centers, and 480 V motor control centers required to meet the requirement. ITS LCO 3.8.9.b requires the opposite unit AC electrical power distribution train(s) that support equipment required by LCO 3.5.2, “ECCS – Operating,” LCO 3.7.10, “Control Room Emergency Ventilation System (CREVS),” LCO 3.7.11, “Control Room Emergency Air Temperature Control System (CREATCS),” and LCO 3.8.4, “DC Sources – Operating,” to be OPERABLE. This changes the CTS by requiring both opposite-unit AC electrical power distribution trains when needed to support loads required by other Specifications. This change is designated as more restrictive because additional LCO requirements are being applied in the ITS than were applied in the CTS.	LCO 3.8.9.b	3.8.3.1
3.8.10 M01	CTS 3.8.1.2.b.6 requires, in part, one Emergency Diesel Generator (EDG) with an energized motor control center (MCC) bus (as identified by Specification 3.8.1.1.b). CTS 3.8.3.2 states, in part, that as a minimum, the following AC buses shall be energized in the specified manner and then lists the applicable busses and how the buses are energized. ITS LCO 3.8.10 states that the necessary portion of AC and DC electrical power distribution trains, and AC	LCO 3.8.10 Required Action A.1	3.8.1.2.b.6 3.8.3.2

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.10 M01 (continued)	vital electrical power distribution subsystems shall be OPERABLE to support equipment required to be OPERABLE. In addition, an optional Required Action (ITS 3.8.10, Required Action A.1) has been added which allows the associated supported required feature(s) to be declared inoperable. This changes the CTS by requiring those necessary portions of electrical power distribution trains and subsystems to be OPERABLE to support equipment required to be OPERABLE, which could require more distribution buses or panels to be OPERABLE than is currently required. In addition, an action has been added to allow an option to the existing actions. This change is designated as more restrictive because a new requirement is added to the CTS, where more buses may be required to be OPERABLE in ITS versus CTS.		
3.8.10 M02	CTS 3.8.1.2 and CTS 3.8.3.2 are applicable in MODES 5 and 6. ITS 3.8.10 is applicable in MODES 5 and 6 and during movement of irradiated fuel assemblies and has an ACTIONS Note stating that LCO 3.0.3 is not applicable. This changes the CTS by adding the Applicability of "During movement of irradiated fuel assemblies," and adds a Note to the ACTIONS stating that LCO 3.0.3 is not applicable. This change is designated as more restrictive because ITS requires equipment to be OPERABLE during movement of irradiated fuel assemblies both inside and outside of containment, not only when in MODES 5 and 6 as in CTS.	3.8.10 Applicability ACTIONS Note	3.8.1.2 3.8.3.2 Applicability
3.8.10 M03	CTS 3.8.3.2 Action does not contain a Required Action to declare associated required residual heat removal subsystem(s) inoperable and not in operation. ITS 3.8.10, Required Action A.2.4, requires that when one or more required AC or DC electrical power distribution trains, or AC vital electrical power distribution subsystems are inoperable to declare the associated required residual heat removal (RHR) subsystem(s) inoperable and not in operation unless the associated supported required feature(s) were declared inoperable. This changes the CTS by potentially requiring declaring the associated required residual heat removal subsystem(s) inoperable and not in operation when one or	3.8.10 Required Action A.2.4	3.8.3.2 Action

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.10 M03 (continued)	more required AC or DC electrical power distribution trains, or AC vital electrical power distribution subsystems are inoperable. This change is designated as more restrictive because additional Required Actions may be taken in ITS than are currently in CTS.		
Refer to DOC section in ML23151A452	**Section 3.9, Refueling Operations**		
3.9.1 M01	CTS Surveillance Requirement (SR) 4.9.1.2 requires the RCS boron concentration to be verified in accordance with the Surveillance Frequency Control Program (SFCP). ITS 3.9.1.1 requires the RCS boron concentration to be verified within limits specified in the CORE OPERATING LIMITS REPORT (COLR) in accordance with the SFCP. In addition, the CTS specifies that the RCS includes the refueling canal, which the ITS includes in the Bases along with the refueling cavity (see DOCs A03 and LA02). This changes the CTS by specifying the boron concentration limits will be included in the COLR. This change is designated as more restrictive because the ITS will specify a new requirement that is not currently in the CTS.	SR 3.9.1.1	4.9.1.2
3.9.3 M01	CTS 3.9.2 ACTION b, requires that when two required Source Range Neutron Flux Monitors are inoperable, to determine the boron concentration of the RCS once per 12 hours. ITS 3.9.3, ACTION B requires the initiation of action to restore one source range neutron flux monitor to OPERABLE status immediately and to perform SR 3.9.1.1 (verify boron concentration) once per 12 hours when two required monitors are inoperable. This changes the CTS by adding a requirement to “immediately” initiate action to restore one monitor to OPERABLE status. This change is classified as more restrictive because an additional requirement is being added to the CTS Actions.	3.9.3, ACTION B	3.9.2 Action b

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.3 M02	CTS 3.9.2 does not contain a specific requirement if the source range audible alarm circuit is inoperable. ITS 3.9.5 ACTION C adds a specific action to initiate action to immediately isolate unborated water sources. This changes the CTS by adding a specific action when the source range audible alarm circuit is inoperable. This change is considered more restrictive because additional actions are required when the source range audible alarm circuit is inoperable.	3.9.5 ACTION C	None
3.9.6 M01	ITS 3.9.6 contains a Surveillance Requirement (SR) (SR 3.9.6.2) to verify correct breaker alignment and indicated power available to the required RHR pump that is not in operation. CTS 3.9.8.2 does not contain a similar SR. This changes the CTS by adding this SR as part of the PTN conversion to ITS. This change is designated as more restrictive because an additional SR will be performed that is currently not in CTS.	SR 3.9.6.2	None
3.10.1 M01	CTS 3.10.1 provides an exception to the SHUTDOWN MARGIN requirements in CTS 3.1.1.1 in MODE 2 due to the purpose of the measurement of rod worth and shutdown margin provided the reactivity equivalent to at least the highest estimated control rod worth is available for trip insertion from OPERABLE control rod(s). According to the Bases, this special test exception provides that a minimum amount of control rod worth is immediately available for reactivity control when tests are performed for control rod worth measurement. This special test exception is required to permit the periodic verification of the actual versus predicted core reactivity condition occurring as a result of fuel burnup or fuel cycling operations. This changes the CTS by eliminating a special test exception. This a more restrictive change as a special test exception, in CTS, is being removed in ITS.	N/A	3.10.1

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.10.2 M01	CTS 3/4.10.2 provides an exception to the rod group height, rod insertion, and power distribution limits specifications. This special test exception permits individual control rods to be positioned outside of their normal group heights and insertion limits during the performance of such PHYSICS TESTS as those required to 1) measure control rod worth and 2) determine the reactor stability index and damping factor under xenon oscillation conditions. The ITS does not contain this special test exception. This changes the CTS by eliminating a special test exception. This a more restrictive change as a special test exception, in CTS, is being removed in ITS.	N/A	3.10.2
3.10.5 M01	CTS 3.10.5 states "The limitations of Specification 3.1.3.3 may be suspended during the performance of individual full length shutdown and control rod drop time measurements provided; a. Only one shutdown or control bank is withdrawn from the fully inserted position at a time, and b. The rod position indicator is OPERABLE during the withdrawal of the rods." The ITS does not contain this special test exception. This changes the CTS by eliminating a special test exception. This a more restrictive change as a special test exception, in CTS, is being removed in ITS.	N/A	3.10.5

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
Refer to DOC section in ML22089A454	**Chapter 5.0, Administrative Controls**		
5.1 M01	CTS 6.1 does not contain any information concerning the Plant Manager's (or his designee's) role in plant activities that affect nuclear safety. ITS 5.1 contains a requirement that directs the plant manager or his designee to approve, prior to implementation each proposed test, experiment, or modification to systems or equipment that affect nuclear safety. This changes the CTS by requiring the plant manager or his designee to approve certain activities to systems and equipment, prior to implementation, that affect nuclear safety. This change is designated as more restrictive because it adds an additional responsibility for the plant manager in the Administrative Controls Chapter of the TS.	5.1	6.1
5.2 M01	CTS 6.2.1.a, regarding documentation and updating of the relationships between operating organization positions, requires that the lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to, and including, all operating organization positions. Those relationships shall be documented and updated, as appropriate, in the form of organizational charts. These organizational charts will be documented in the QA Topical Report and updated in accordance with 10 CFR 50.54(a)(3). ITS 5.2.1.a states "Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications shall be documented in the…" This changes the CTS by adding more detailed requirements.	5.2.1.a	6.2.1.a

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.2 M01 (continued)	This change is designated as more restrictive because it required additional information to be maintained in the QATR.		
5.4 M01	ITS 5.4.1.e requires written procedures be established, implemented, and maintained for programs specified in Specification 5.5. The CTS does not include this requirement for any program except the OFFSITE DOSE CALCULATION MANUAL and the Diesel Fuel Oil Testing Program. This changes the CTS by adopting a new requirement for procedures to address programs described in ITS Section 5.5. This change is designated as more restrictive because it imposes new administrative requirements for procedures within the TSs.	5.4.1.e	None
5.5 M01	The CTS does not include a requirement for the Battery Monitoring and Maintenance Program. The ITS includes a requirement for this program. This changes the CTS by adding the ITS 5.5.14, "Battery Monitoring and Maintenance Program." This change is designated as more restrictive because it imposes additional programmatic requirements in the TSs.	5.5.14	None
5.5 M02	The CTS does not include a requirement for the Pre-Stressed Concrete Containment Tendon Surveillance Program. The ITS includes a requirement for this program. This changes the CTS by adding the ITS 5.5.4, "Pre-Stressed Concrete Containment Tendon Surveillance Program." This change is designated as more restrictive because it imposes additional programmatic requirements in the TSs.	5.5.4	None

Table M – More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.5 M03	The CTS does not include a requirement for the VFTP. The ITS includes a requirement for this program. This changes the CTS by adding the ITS 5.5.8, “Ventilation Filter Testing Program.” This change is designated as more restrictive because it imposes additional programmatic requirements in the TSs.	5.5.8	None
5.6 M01	CTS 6.9.1.8 provides requirements for the SG Tube Inspection Report and lists items to include in the report. ITS 5.6.5 also provides requirements for the SG Tube Inspection Report and a list of items to include in the report. ITS 5.6.5 additionally requires the report to include: 1) the nondestructive examination techniques utilized for tubes with increased degradation susceptibility (ITS 5.6.5.b); 2) an analysis summary of the tube integrity conditions predicted to exist at the next scheduled inspection relative to the applicable performance criteria, including the analysis methodology, inputs, and results (ITS 5.6.5.d); and 3) the results of any SG secondary side inspections (ITS 5.6.5.f). This changes the CTS by requiring additional items to be included in the SG Tube Inspection Report that is submitted to the NRC. The proposed change is designated as more restrictive because additional items are required in the ITS to be included in the SG Tube Inspection Report than required in the CTS.	5.6.5	6.9.1.8

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
Refer to DOC section in ML23151A441		**Chapter 1.0, Use and Application**			
1.0 LA01	Table 1.2	CTS Table 1.1, “OPERATIONAL MODES,” states that MODE 6 is restricted to reactivity conditions with k_{eff} ≤ 0.95. ITS Table 1.1-1, “MODES,” does not contain this restriction. This change is designated a less restrictive removal of detail because it moves information from the TSs to the TS Bases.	ITS Bases	Technical Specifications Bases Control Program	1
1.0 LA02	1.14 Table 1.1	CTS 1.14 and CTS Table 1.1 state FREQUENCY NOTATION for the performance of Surveillance Requirements in the CTS. The ITS state periodic frequency as “In accordance with the Surveillance Frequency Control Program.” This changes the CTS by moving the FREQUENCY NOTATION Table to the Surveillance Frequency Control Program. This change is designated as a less restrictive removal of detail change because the FREQUENCY NOTATION for the performance of Surveillance Frequencies is being removed from the TSs and placed in a licensee-controlled document.	Surveillance Frequency Control Program	Surveillance Frequency Control Program	4

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
Refer to DOC section in ML23151A443		**Chapter 3.0, LCO and SR Applicability**			
3.0.8 LA01	3.7.6 4.7.6 6.8.4.m	CTS 3.7.6 provides the requirements for all snubbers, excluding those installed on non safety-related systems and then only if the of a snubber failure or failure of the system on which the snubber(s) is installed would have no adverse effect on any safety-related system. CTS 6.8.4.m requires a program that conforms to the examination, testing and service life monitoring for dynamic restraints (snubbers) in accordance with 10 CFR 50.55a inservice inspection (ISI) requirements for supports. These specifications with the exception of the Action in CTS 3.7.6 are not included in the ITS. This changes the CTS by moving the explicit snubber requirements from the TSs to the Technical Requirements Manual (TRM). This change is designated as a less restrictive removal of detail chance because a requirement is being removed from TSs.	TRM	10 CFR 50.59 10 CFR 50.55a	4
Refer to DOC section in ML23151A444		**Section 3.1, Reactivity Control Systems**			
3.1.1 LA01	4.1.1.1.1.e 4.1.1.2.b	CTS 4.1.1.1.1.e and CTS 4.1.1.2.b require determination that the SDM is within limits, and specifically requires the consideration of the following factors: reactor coolant system boron concentration, control rod position, reactor coolant system average temperature, fuel burnup based on gross thermal energy generation, xenon concentration and samarium concentration. ITS SR 3.1.1.1 requires a determination that the SDM is within limits but does not describe the factors that must be considered in the calculation. This information is moved to the Bases. This	ITS Bases	Technical Specification Bases Control Program	3

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.1.1 LA01 (continued)		changes the CTS by removing details on how the SDM calculation is performed from the Specification and placing the information in the Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.			
3.1.2 LA01	4.1.1.1.2	CTS 3.1.1.1, Surveillance Requirement (SR) 4.1.1.1.2 requires verification that core reactivity is within ± 1% Δk/k and states: "This comparison shall consider at least those factors stated in Specification 4.1.1.1.1e, above." ITS SR 3.1.2.1 requires verification that core reactivity is within ± 1% Δk/k, but does not describe the factors that must be considered in the calculation. This information is moved to the Bases. This changes the CTS by removing details on how the SDM calculation is performed from the Specification and placing the information in the Bases. This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the CTS.	ITS Bases.	Technical Specification Bases Control Program	3
3.1.3 LA01	4.1.1.3b	CTS SR 4.1.1.3b states in the NOTE * the use of benchmark criteria in WCAP-13749-P-A. TS3.1.3 (SR 3.1.3.2) does not include reference to WCAP-13749-P-A. This changes the CTS by relocating the use of benchmark criteria in WCAP13749-P-A to the Core Operating Limits Report (COLR). This change is designated as a less restrictive removal of detail change because information relating to cycle-specific parameter limits is being removed from the TSs.	COLR	10 CFR 50.59 5.6.3	6

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.1.3 LA02	3.1.1.3	CTS 3.1.1.3 states "…for all the rods withdrawn, beginning of cycle life (BOL), for power levels up to 70% RATED THERMAL POWER with a linear ramp to 0 $\Delta k/k/°F$ at 100% RATED THERMAL POWER." This information is contained in the COLR. This changes the CTS by relocating the use of this CTS statement to the COLR. This change is designated as a less restrictive removal of detail change because information relating to cycle-specific parameter limits is being removed from the TSs.	COLR	10 CFR 50.59	6
3.1.4 LA01	3.1.3.1 ACTION d.3.d	CTS 3.1.3.1 ACTION d.3.d) states when a rod is misaligned, POWER OPERATION may continue if a reevaluation of each accident analysis in Table 3.1-1 is performed within 5 days. This reevaluation shall confirm that the previously analyzed results of these accidents remain valid for the duration of operation under these conditions. ITS 3.1.4 Required Action B.5 requires that when one rod is misaligned, re-evaluation of the safety analyses is performed along with confirmation that the results remain valid for the duration of operation under these conditions. This changes the CTS by moving the accidents listed in Table 3.1-1 to the Updated Final Safety Analysis Report (UFSAR). This change is designated as a less restrictive removal of detail change because information relating to procedural detail is being removed from the TSs.	UFSAR	10 CFR 50.59	3

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.1.4 LA02	4.1.3.1.1	CTS 4.1.3.1.1 requires, in part, the position of each rod to be determined, allowing for one hour thermal soak after rod motion. ITS SR 3.1.4.1 requires the verification of individual rod position within alignment limits and is modified by a Note that states the SR is not required to be performed until one hour after associated rod motion. This changes the CTS by not explicitly specifying the one hour is for thermal soak after rod motion. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.	ITS BASES	Technical Specification Bases Control Program	1
3.1.7 LA01	LCO 3.1.3.2	CTS LCO 3.1.3.2 requires the shutdown and control rod position indication system and the demand position indication system to be OPERABLE and capable of determining the respective actual and demanded shutdown and control rod positions as follows: a. Analog rod position indicators, within one hour after rod motion (allowance for thermal soak); All Shutdown Banks: within the Allowed Rod Misalignment of Specification 3.1.3.1 of the group demand counters for withdrawal ranges of 0-30 steps and 200-All Rods Out as defined in the Core Operating Limits Report. Control Bank A and B: within the Allowed Rod Misalignment of Specification 3.1.3.1 of the group demand counters for withdrawal ranges of 0-30 steps and 200All Rods Out as defined in the Core Operating Limits Report.	ITS Bases	Technical Specification Bases Control Program	1

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.1.7 LA01 (continued)		Control Banks C and D: within the Allowed Rod Misalignment of Specification 3.1.3.1 of the group demand counters for withdrawal range of 0-All Rods Out as defined in the Core Operating Limits Report. b. Group demand counters; ± 2 steps. ITS LCO 3.1.7 requires the analog RPI System and the Demand Position Indication System to be OPERABLE but the details of what constitutes an OPERABLE system are moved to the Bases. This changes the CTS by removing the details of what constitutes an OPERABLE system to the Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.			
CTS 3.1.2.1, CTS 3.1.2.2, CTS 3.1.2.3, CTS 3.1.2.4, CTS 3.1.2.5 R01	3.1.2.1 3.1.2.2 3.1.2.3 3.1.2.4 3.1.2.5	CTS 3.1.2.1 provides the requirements for the minimum boron injection flow paths (one) during shutdown (Modes 5 and 6). CTS 3.1.2.2 provides the requirements for the minimum boron injection flow paths (2) during Operation Modes 1 - 4. CTS 3.1.2.3 provides the requirement to have two charging pumps available during Modes 1 – 4 as the motive means to get the boron inventory to the RCS during normal operation. CTS 3.1.2.4 requires as a minimum one borated water source (Boric Acid Storage System or Refueling Water Storage Tank) to be Operable during Modes 5 and 6. CTS 3.1.2.5 requires both borated water sources (Boric Acid Storage System and Refueling Water Storage Tank) to be Operable during Modes 1 - 4. The boration systems are not assumed to be operable to mitigate the consequences of a DBA or transient. In the	TRM	10 CFR 50.59	NA

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
CTS 3.1.2.1, CTS 3.1.2.2, CTS 3.1.2.3, CTS 3.1.2.4, CTS 3.1.2.5 R01 (continued)		case of a malfunction of a component in the boration systems which causes a boron dilution event, the automatic response, or that required by the operator, is to close the appropriate valves in the reactor makeup system. The automatic plant response to a boron dilution event also includes automatic control rod assembly movement and reactor trip features to ensure shutdown margin is maintained. The boration capabilities of the boration systems are not assumed to mitigate the boron dilution event. The analysis demonstrates that there is not a complete loss of available shutdown margin following a CVCS malfunction event within a specified amount of time for the operator to take action to diagnose the event, terminate the dilution source and initiate boration. Operability requirements for ensuring adequate Shutdown Margin and supporting minimum boration requirements during plant shutdown, are retained in separate TSs. This is change is designated as less strictive since information is being removed from TSs to a licensee-controlled document.			
CTS 3.1.3.3 R01 CTS 3.1.3.3 R01	3.1.3.3	CTS 3.1.3.3 provides the requirements for the group step counter demand position indicator to be OPERABLE and capable of determining within ± 2 steps the demand position for each shutdown and control rod not fully inserted in Modes 3, 4 and 5 with the reactor trip breakers in the closed position. Rod position indication ensure OPERABILITY of the control rod position indicators to determine control rod positions and thereby ensure compliance with the control	TRM	10 CFR 50.59	NA

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
(continued)		rod alignment and insertion limits. In Modes 3, 4, and 5 SDM is required per LCO 3.1.1, which references the COLR. The COLR requires sufficient reactivity margin to ensure fuel design limits will not be exceeded for normal shutdown and anticipated operational occurrences. This sufficient reactivity margin takes into account rod positions with the single rod cluster assembly of the highest reactivity worth fully withdrawn. In the shutdown MODES, the OPERABILITY of the shutdown and control banks has the potential to affect the required SDM, but this effect can be compensated for by an increase in the boron concentration of the Reactor Coolant System. Position Indication requirements in Modes 1 and 2 are required by LCO 3.1.7 to ensure the initial conditions of the Safety Analyses are maintained. This is change is designated as less strictive since information is being removed from TSs to a licensee-controlled document.			
Refer to DOC section in ML23151A445		**Section 3.2, Power Distribution Limits**			
3.2.1 LA01 3.2.1 LA01 (continued)	3.2.2 Action b 4.2.2.1 4.2.2.2 4.2.2.3 4.2.2.4	CTS 3.2.2 contains specific equations for the Heat Flux Hot Channel Factors ($F_Q(Z)$) in the LCO to ensure $F_Q(Z)$ is within limits. In addition, CTS 3.2.2, Action b allows THERMAL POWER to be increased above the action limit provided $F_Q^M(Z)$ is demonstrated through incore mapping to be within its limit. CTS 4.2.2.1 clarifies $[F_Q]^P$ as predicted by approved physics calculations, and includes details related to how a power distribution map is obtained, explanation of the term P_T. CTS 4.2.2.2.a and associated footnotes, CTS 4.2.2.3.b, and CTS 4.2.2.4.c	ITS Bases	Technical Specification Bases Control Program	2

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
		contain information detail related to uncertainty and explanation of terms. ITS 3.2.1 does not contain these informational details but rather a requirement to maintain $F_Q(Z)$ within limits specified in the COLR. This changes the CTS by relocating specific details of the LCO, Actions, and Surveillance Requirements to the TS(TS) Bases. This change is designated as a less restrictive removal of detail change because information relating to system operation is being removed from the TSs.			
3.2.1 LA02	4.2.2.1 4.2.2.2 4.2.2.3 4.2.2.4	CTS 4.2.2.1, 4.2.2.2, 4.2.2.3, 4.2.2.4. and 4.2.2.5 provide details for evaluating $F_Q(Z)$ by using various methods and parameters, depending on whether the method being used is the normal method, Movable Incore Detector System (MIDS) (i.e., augmented calculation), Base Load, or Radial Burndown. These methods ensure $F_Q(Z)$ is within limits by surveillance, or certain actions must be taken. ITS SR 3.2.1.1 verifies that $F_Q(Z)$ is within the limits specified in the COLR using the normal method. ITS SR 3.2.1.2 verifies that $F_Q(Z)$ is within the limits specified in the COLR using augmented calculation method or the calculation methods for based load operation or radial burndown. This changes the CTS by moving the details of the methods for verifying $F_Q(Z)$ is within the limits to the COLR where the limits are specified. This change is designated as a less restrictive removal of detail change because procedural type information is being removed from the TSs.	COLR	10 CFR 50.59 ITS 5.6.3	3

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.2.1 LA03	4.2.2.2 4.2.2.3	CTS 4.2.2.2.c provides requirements to consider the MIDS Operable when thermal power exceeds P_T. CTS 4.2.2.3.a and c provide precondition and operational requirements to enter base load operation. ITS 3.2.1 does not contain these procedural requirements. This changes the CTS by relocating specific procedural details related to entering and operating in base load operation or radial burndown conditions to the TRM. This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.	TRM	10 CFR 50.59	3
3.2.2 LA01	3.2.3 Action b Action c 4.2.3.3	CTS 3.2.3 ACTIONS b and c require $F^N_{\Delta H}$ to be determined to be within its limit through incore flux mapping. Additionally, CTS 4.2.3.3 requires $F^N_{\Delta H}$ to be within its limit through incore flux mapping. ITS SR 3.2.2.1 verifies that $F^N_{\Delta H}$ is within its limit. This changes the CTS by moving the manner in which the $F^N_{\Delta H}$ determination is performed to the Bases. This change is designated as a less restrictive removal of detail change, because procedural details for meeting TS requirements are being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	3
3.2.2 LA02	3.2.3	CTS LCO 3.2.3 states "$F^N_{\Delta H}$ shall be limited by the following relationship: $F^N_{\Delta H} \leq F^{RTP}_{\Delta H}$ [1.0 + $PF_{\Delta H}$ (1-P)], Where: $F^{RTP}_{\Delta H}$ = $F_{\Delta H}$ limit at RATED THERMAL POWER as specified in the CORE OPERATING LIMITS REPORT	ITS Bases	Technical Specification Bases Control Program	1

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.2.2 LA02 (continued)		$PF_{\Delta H}$ = Power Factor Multiplier for $F_{\Delta}H$ as specified in the CORE OPERATING LIMITS REPORT $$P = \frac{\text{THERMAL POWER}}{\text{RATED THERMAL POWER}}$$ ITS LCO 3.2.3 requires the definition of $F^N_{\Delta H}$ for its use but the details of what constitutes this definition are moved to the Bases. This changes the CTS by removing the details of what constitutes the definition of $F^N_{\Delta H}$ to the Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.			
3.2.2 LA03	4.2.3.2	CTS SR 4.2.3.2 states "When a measurement of $F^N_{\Delta H}$ is taken, the measured shall be increased by 4% to account for measurement error." ITS SR 3.2.2.1 does not address measurement error. This changes the CTS by not accounting for measurement error. This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	3
3.2.3 LA01	4.2.1.2 4.2.1.3	CTS 4.2.1.2 and CTS 4.2.1.3 contain AFD SRs specifically to determine the target flux difference. Specifically, CTS 4.2.1.2 requires determination by measurements and CTS 4.2.1.3 requires updating the target flux differences. ITS 3.2.3 does not contain these specific SRs. This changes the CTS by moving these SRs to the TRM.	TRM	10 CFR 50.59	4

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.2.3 LA01 (continued)		This change is designated as a less restrictive removal of detail change because details for meeting TS requirements are being removed from the TSs.			
3.2.3 LA02	3.2.1 Action b	CTS 3.2.1 states in footnote ** "P_T = Reactor Power at which predicted F_Q would exceed its limit (consistent with Specification 4.2.2.1)." ITS LCO 3.2.3 does not have this statement. This changes the CTS by having this statement relocated to the Bases for ITS 3.2.3. This change is designated as a less restrictive removal of detail change because details are being removed from the TSs.	ITS Bases COLR	Technical Specification Bases Control Program ITS 5.6.3 10 CFR 50.59	3
3.2.3 LA03	3.2.1	CTS 3.2.1 LCO states "within a +/- 2% or +/- 3% target band about the target flux difference during Base Load operation." ITS 3.2.3 does not have this statement. This changes the CTS by relocating this statement to the COLR. This change is designated as a less restrictive removal of detail change because information relating to cycle-specific parameter limits is being removed from the TSs.	COLR	10 CFR 50.59 ITS 5.6.3	6
3.2.4 LA01	4.2.4.2	CTS 4.2.4.2 states, in part, that the QPTR shall be determined to be within the limit by using the movable incore detectors to confirm that the normalized symmetric power distribution, obtained either from two sets of four symmetric thimble locations or full-core flux map, or by incore thermocouple map is consistent with the indicated QPTR. ITS Surveillance Requirement (SR) 3.2.4.2 and SR 3.2.4.3 require verifying QPTR is within limit using the movable incore detectors or by incore thermocouple map, respectively. This changes the CTS by moving the	ITS Bases	Technical Specification Bases Control Program	3

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.2.4 LA01 (continued)		procedural details for meeting the Surveillance to the Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.			
Refer to DOC section in ML23151A446		**Section 3.3, Instrumentation**			
3.3.1 LA01	N/A	Not used.	N/A	N/A	N/A
3.3.1 LA02	Table 3.3-1	CTS Table 3.3-1 has three columns stating various requirements for each function labeled, Total No. Of Channels, Channels to Trip, and Minimum Channels Operable. ITS Table 3.3.1-1 contains the heading of Required Channels, which, from a number of channels "required" perspective, more closely aligns with the Total Number of Channels column. This changes the CTS by moving the information of the Minimum Channels Operable and Channels to Trip columns to the Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1
3.3.1 LA03	Table 3.3-1 Note***	CTS Table 3.3-1 contains a Note for the Underfrequency Trip of Reactor Coolant Pump (RCP) Breaker(s) Open (Above P-7) Function that lists information of what each of the RCP breaker is tripped by. ITS Table 3.3.1-1 does not contain this information. This changes the CTS by eliminating specific details from the Technical Specification.	UFSAR	10 CFR 50.59	1

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.1 LA03 (continued)		This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.			
3.3.1 LA04	3.3.1 ACTION 10	CTS 3.3.1, ACTION 10, contains the following statement, "The breaker shall not be bypassed while one of the diverse trip features is inoperable, except for the time required for performing maintenance to restore the breaker to OPERABLE status." ITS 3.3.1, ACTION S, does not contain this statement. This changes the CTS by eliminating a requirement from Technical Specification. This change is designated as a less restrictive removal of detail change because specific requirements on when not to bypass the breakers is being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	3
3.3.1 LA05	Table 4.3-1 Note 2	CTS Table 4.3-1, Note 2, requires, in part, that below 70%, downward adjustment of NIS excore channel gains to match a lower calorimetric power level are not required. ITS SR 3.3.1.2 does not contain this statement. This changes the CTS by relocating the discussion of NIS excore channel gains downward adjustment to the TS Bases. This change is designated as a less restrictive removal of detail change because specific requirements are being removed from the CTS.	ITS Bases	Technical Specification Bases Control Program	3
3.3.1 LA06	4.3-1 Note 9	CTS Table 4.3-1, Note 9 (associated with the Source Range, Neutron Flux instrumentation), states "Quarterly surveillance in MODES 3*, 4*, and 5* shall also include verification that permissive P-6 and P-10 are in their required state for existing plant conditions by observation of the permissive annunciator window. Quarterly surveillance shall include verification of the High Flux at	ITS Bases	Technical Specification Bases Control Program	3

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.1 LA06 (continued)		Shutdown Alarm Setpoint of ½ decade above the existing count rate." ITS SR 3.3.1.8 Note contains the same requirement except it does not specify how to verify the P-6 and P-10 permissive ("by observation of the permissive annunciator") and does not specify that the quarterly surveillance shall include verification of the High Flux at Shutdown Alarm Setpoint of ½ decade above the existing count rate. This changes the CTS by relocating the details of how the Surveillance is to be performed to the TS Bases. This change is designated as a less restrictive removal of detail change because specific requirements are being removed from the CTS.			
3.3.1 LA07	Table 4.3-1 Note 10	CTS Table 4.3-1, Note 10, specifies the TRIP ACTUATION DEVICE OPERATIONAL TEST (TADOT) for the Turbine Trip Functions are required whenever the unit has been in MODE 3 if not performed within the previous 31 days and that setpoint verification is not applicable when performing the TADOT. ITS SR 3.3.1.13 does not contain these specific exceptions. This changes the CTS by relocating the exception details from the SR Note to the TS Bases. This change is designated as a less restrictive removal of detail change because specific requirements are being removed from the CTS.	ITS Bases	Technical Specification Bases Control Program	3
3.3.1 LA08	Table 4.3-1 Note 11	CTS Table 4.3-1, Note 11, specifies the TADOT for the Reactor Trip Breakers shall include independent verification of operability of the undervoltage and shunt trip attachment. ITS SR 3.3.1.4 does not contain this specific requirement in the SR Note(s). This changes the CTS by relocating the TADOT requirement from the SR Note to the TS Bases.	ITS Bases	Technical Specification Bases Control Program	3

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.1 LA08 (continued)		This change is designated as a less restrictive removal of detail change because specific requirements are being removed from the CTS.			
3.3.1 LA09	Table 4.3-1 Notes 13 and 15	CTS Table 4.3-1, Notes 13 and 15, specify the following requirements for the TADOT, the automatic undervoltage trip and remote manual undervoltage trip when breaker is placed in service. ITS SR 3.3.1.12 does not contain this specific requirement in the SR Note(s). This changes the CTS by relocating the TADOT requirement from the SR Note to the TS Bases. This change is designated as a less restrictive removal of detail change because specific requirements are being removed from the CTS.	ITS Bases	Technical Specification Bases Control Program	3
3.3.1 LA10	Table 4.3-1 Note 14	CTS Table 4.3-1, Note 14, specifies the Actuation Logic Test for the Reactor Trip Bypass Breakers Interlock Logic Test shall consist of verifying that the interlock is in its required state by observing the permissive annunciator window. ITS SR 3.3.1.12 does not contain this specific requirement in the SR Note(s). This changes the CTS by relocating the Actuation Logic Test requirement from the SR Note to the TS Bases. This change is designated as a less restrictive removal of detail change because specific requirements are being removed from the CTS.	ITS Bases	Technical Specification Bases Control Program	3
3.3.1 LA11	Table 2.2-1 Functional Unit 12 Note * Note ***	The limits specified in CTS Table 2.2-1, Functional Unit 9, “Pressurizer Water Level-High,” are stated as a percentage “of instrument span.” CTS Table 2.2-1, Functional Unit 10, “Reactor Coolant Flow-Low,” is modified by a Note * that states the design RCS flow. The limits specified in CTS Table 2.2-1, Functional Unit 11, “Steam Generator Water Level Low-Low,” and	ITS Bases	Technical Specification Bases Control Program	1

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.1 LA11 (continued)		Functional Unit 12, "Steam Generator Water Level-Low," are stated as a percentage "of narrow range instrument span." CTS Table 2.2-1, Functional Unit 15.b, "Turbine Stop Valve Closure," is modified by Note *** that states that the limit switch is set when Turbine Stop Valves are fully closed. The corresponding Functions in ITS Table 3.3.1-1 do not contain this information. This design information is being relocated to the TS Bases. This changes the CTS by moving the design information to the Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.			
3.3.1 LA12	2.2-1 Note 2	CTS Table 2.2-1, Note 2, states," The Overtemperature ΔT function Allowable Value shall not exceed the nominal trip setpoint by more than 0.5% ΔT span for the ΔT channel, 0.2% ΔT span for the Pressurizer Pressure channel, and 0.4% ΔT span for the f(ΔI) channel. No separate Allowable Value is provided for Tavg because this function is part of the ΔT value." ITS Table 3.3.1-1, Note 1, states, in part, "The Overtemperature ΔT function Allowable Value shall not exceed the following nominal trip setpoint by more than 0.5% ΔT span for the ΔT channel, 0.2% ΔT span for the Pressurizer Pressure channel, and 0.4% ΔT span for the f(ΔI) channel." In addition, CTS Table 2.2-1, Note 4, states, "The Overpower ΔT function Allowable Value shall not exceed the nominal trip setpoint by more than 0.5% ΔT span for the ΔT channel. No separate Allowable Value is provided for Tavg because this function is part of the ΔT value." ITS Table 3.3.1-1, Note 2, states, in part, "The Overpower ΔT function Allowable Value shall not exceed the following nominal trip setpoint by more than 0.5% ΔT	ITS Bases	Technical Specification Bases Control Program	1

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.1 LA12 (continued)		span for the ΔT channel." ITS Table 3.3.1-1, Notes 1 and 2, do not contain the statement, "No separate Allowable Value is provided for Tavg because this function is part of the ΔT value." This changes the CTS by moving the statement, "No separate Allowable Value is provided for Tavg because this function is part of the ΔT value," to the Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.			
3.3.2 LA01	Table 3.3-2	CTS Table 3.3-2 has three columns stating various requirements for each function labeled, "TOTAL NO. OF CHANNELS," "CHANNELS TO TRIP," and "MINIMUM CHANNELS OPERABLE." ITS Table 3.3.2-1 does not retain the "TOTAL NO. OF CHANNELS" or "CHANNELS TO TRIP" columns. This changes the CTS by moving the information of the "TOTAL NO. OF CHANNELS" and "CHANNELS TO TRIP" columns to the Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1
3.3.2 LA02	Table 3.3-2 Note # # # #	CTS Table 3.3-2 Functional Unit 5.c, (Feedwater Isolation, Steam Generator Water Level – High-High) contains a footnote (# # # #) that states, "Steam Generator overfill protection is not part of the Engineered Safety Features Actuation System (ESFAS), and is added to the Technical Specifications only in accordance with NRC Generic Letter 89-19." ITS Table 3.3.2-1 Function 5.b, (Feedwater Isolation, SG Water Level – High High (P14)) does not provide this information. This changes the CTS by moving the details of required switch operation for actuation to the ITS Bases.	ITS Bases	Technical Specification Bases Control Program	1

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.2 LA02 (continued)		This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.			
3.3.2 LA03	Table 3.3-2 Footnote # # #	CTS Table 3.3-2 Functional Unit 6, (Auxiliary Feedwater) contains footnote (# # #) that states, "Auxiliary feedwater manual initiation is included in Specification 3.7.1.2." ITS Table 3.3.2-1 Function 6, (Auxiliary Feedwater) does not provide this information. This changes the CTS by moving the details of the location of the Auxiliary Feedwater manual initiation instrumentation requirement to the ITS Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1
3.3.2 LA04	N/A	Not used.	N/A	N/A	N/A
3.3.2 LA05	Table 3.3-3 Functional Unit 5.c and 6.b	LA05 (Type 1 – Removing Details of System Design and System Description, Including Design Limits) CTS Table 3.3-3 Functional Unit 5.c (Feedwater Isolation – Steam Generator Water level--High-High) and Functional Unit 6.b, "Steam Generator Water Level--Low-Low," Trip Setpoints and Allowable Values contains a description specifying the steam generator water level instrument range the limit is associated with. ITS Table 3.3.2-1 Function 5.b (Feedwater Isolation – SG Water Level High High) and Function 6.b, "Steam Generator Water Level--Low-Low," do not contain this information. This changes the CTS by moving the details of which steam generator water level instrument range the limit is associated with to the TS Bases.	ITS Bases	Technical Specification Bases Control Program	1

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.2 LA05 (continued)		This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.			
3.3.3 LA01	Table 3.3-5 Footnote 1	CTS Table 3.3-5, Instrument 16, Reactor Vessel Level Monitoring channel OPERABILITY requirements are modified by footnote 1 that states "A channel is composed of eight sensors in a probe. A channel is OPERABLE if a minimum of four sensors are OPERABLE." ITS Table 3.3.3-1 Function 6 requires two Reactor Vessel Level Monitoring channels to be OPERABLE but the details of what constitutes an OPERABLE channel are not included. This changes the CTS by moving the details of what constitutes an OPERABLE channel to the Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1
3.3.3 LA02	Table 3.3-5 Footnote *	CTS Table 3.3-5 Instrument 22 (Containment Isolation Valve Position Indication) includes a footnote * that states, "Applicable for containment isolation valve position indication designated as post-accident monitoring instrumentation (containment isolation valves which receive containment isolation Phase A, Phase B, or containment ventilation isolation signals." ITS does not include this specific system design detail. This changes the CTS by moving the system design information to the Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.3 LA03	3.3.3.3 Table 4.3-4	CTS 3.3.3.3, Table 4.3-4, Instrument 15 (Containment – High Range Area Radiation Monitor) footnote * states, "Acceptable criteria for calibration are provided in Table II.F.1-3 of NUREG-0737." ITS 3.3.3, Function 10 (Containment Area Radiation (High Range), does not include the footnote information. This changes the CTS by removing the unnecessary detail. This change is designated as a less restrictive removal of detail change because procedural details for meeting TSs requirements are being removed from the TSs	ITS Bases	Technical Specification Bases Control Program	3
3.3.3 LA04	Table 3.3-5 Instruments 3 and 4	CTS Table 3.3-5, Instrument 3, Reactor Coolant Outlet Temperature T_{HOT} (Wide Range) and Instrument 4, "Reactor Coolant Inlet Temperature T_{COLD} (Wide Range)," states that the "Total No. of Channels" is 2-2 Detectors per Channel for each instrument. ITS Table 3.3.3-1, corresponding Functions 3 and 4 require two channels to be OPERABLE. This changes the CTS by moving the details of what constitutes an OPERABLE channel to the Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1
3.3.3 R01	Table 3.3-5	CTS Table 3.3-5 provides requirements for Post-Accident Monitoring Instrumentation channels. Each individual post-accident monitoring parameter has a specific purpose, however, the general purpose for all accident monitoring instrumentation is to ensure sufficient information is available following an accident to allow an operator to verify the response of automatic safety systems, and to take preplanned manual actions to accomplish a safe shutdown of the plant.	TRM	10 CFR 50.59	NA

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.3 R01 (Continued)		The NRC position on application of the screening criteria to post-accident monitoring instrumentation is documented in a letter dated May 9, 1988, from T.E. Murley (NRC) to the Owners Groups. RG 1.97, Type A variables provide primary information, i.e., information that is essential for the direct accomplishment of the specified manual actions (including long term recovery actions) for which no automatic control is provided and that are required for safety systems to accomplish their safety functions for DBAs or transients. Additionally, it could not be confirmed that RG 1.97, non-Type A Category 1 variables are not of prime importance in limiting risk. Therefore, the NRC position is that the post-accident monitoring instrumentation list should contain Type A instruments and non-Type A Category 1 instruments specified in the plant's safety evaluation report (SER) on RG 1.97. Accordingly, this position has been applied to the PTN Units 3 and 4 RG 1.97 instruments. Those instruments meeting these criteria are retained in the TSs. The instruments not meeting these criteria will be relocated from the TSs to the TRM. A review of the PTN Units 3 and 4 UFSAR and the NRC RG 1.97 Safety valuation for PTN Units 3 and 4 shows that the following CTS Table 3.3-5 Instruments do not meet Category 1 or Type A requirements. <u>CTS Table 3.3-5</u> Instrument 7 Auxiliary Feedwater Flow Rate Instrument 8 Reactor Coolant System Subcooling Margin Monitor Instrument 9 PORV Position Indicator (Primary Detector) Instrument 10 PORV Block Valve Position Indicator			

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.3 R01 (Continued)		Instrument 11 Safety Valve Position Indicator (Primary Detector) Instrument 12 Containment Water Level (Narrow Range) This change is designated as a relocation because the requirements for these instruments do not meet the criteria in 10 CFR 50.36(c)(2)(ii) and have been relocated to the TRM.			
CTS 3.3.3.2 R01	3.3.3.2	CTS 3.3.3.2 provides the requirements for Movable Incore Detectors with the specified minimum complement of equipment ensures that the measurements obtained from use of this system accurately represent the spatial neutron flux distribution of the core. The operability of this system is demonstrated by irradiating each detector used and determining the acceptability of its voltage curve. This is change is designated as less strictive since information is being removed from TSs to a licensee-controlled document.	TRM	10 CFR 50.59	NA
3.3.4 LA01	N/A	Not used.	N/A	N/A	N/A
3.3.4 LA02	Table 3.3-2 ACTION 24B	CTS Table 3.3-2, ACTION 24B, Part 2.a, requires the CREVS to immediately be placed in the recirculation mode "with ONE Control Room emergency recirculating fan operating." ITS 3.3.4, Required Action B.1.1, does not contain this level of detail. This changes the CTS by relocating this detail to the TS Bases. This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	3

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.5 LA01	3.3.2 Table 3.3-3	CTS 3.3.2, Table 3.3-3, lists the required undervoltage and degraded voltage tests for the 480 V load centers, which are to include a configuration coincident with the EDG breaker open. CTS 3.3.2, Table 4.3-2, and ITS 3.3.5, Table 3.3.5-1, do not include this information. This changes the CTS by moving the EDG breaker open detail to the TS Bases. This change is designated as a less restrictive removal of detail change because specific prerequisites for the 480 V TADOT are being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1
3.3.6 LA01	Table 3.3-2	CTS Table 3.3-2 has three columns stating various requirements for each function labeled, "TOTAL NO. OF CHANNELS," "CHANNELS TO TRIP," and "MINIMUM CHANNELS OPERABLE." ITS Table 3.3.6-1 does not retain the "TOTAL NO. OF CHANNELS" or "CHANNELS TO TRIP" columns. This changes the CTS by moving the information of the "TOTAL NO. OF CHANNELS" and "CHANNELS TO TRIP" columns to the Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1
Refer to DOC section in ML23151A447		**Section 3.4, Reactor Coolant System (RCS)**			
3.4.1 LA01	4.2.5.4	CTS 4.2.5.4 states "…the RCS flow rate shall be determined by precision heat balance… The measurement instrumentation shall be calibrated within 90 days prior to the performance of the calorimetric flow measurement." ITS 3.2.5 does not have this information. This changes the CTS by not including the stated details.	ITS Bases	Technical Specification Bases Control Program	3

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.4.1 LA01 (continued)		This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.			
3.4.3 LA01	4.4.9.1.2	CTS SR 4.4.9.1.2 states "The reactor vessel material irradiation surveillance specimens shall be removed and examined, to determine changes in material properties, as required by 10 CFR Part 50, Appendix H. The results of these examinations shall be used to update Figures 3.4-2 and 3.4-3." ITS 3.4.3 does not contain this Surveillance Requirement (SR). This changes the CTS by moving this out of TSs. This change is designated as a less restrictive because the details of examining reactor vessel material irradiation surveillance specimens is being removed from the Technical Specifications.	TRM	10 CFR 50.59	4
3.4.3 LA02	4.4.9.1.2	Figures 3.4-2 and 3.4-3 of CTS 3.4.9.1.2 include "Material Property Basis" information above each graph. This information is not necessary to support operation within the limits specified in the figures. This changes the CTS by moving this information out of TSs. This change is designated as a less restrictive because the details of examining reactor vessel material irradiation surveillance specimens is being removed from the TSs.	UFSAR	10 CFR 50.59	4
3.4.4 LA01	4.4.1.1	CTS 4.4.1.1 states that the required reactor coolant loops shall be verified to be in operation and circulating reactor coolant. ITS Surveillance Requirement (SR) 3.4.4.1 states that each RCS loop shall be verified to be in operation. This changes the CTS by moving the SR to	ITS Bases	Technical Specification Bases Control Program	3

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.4.4 LA01 (continued)		verify that the reactor coolant loops are circulating reactor coolant to the Bases. This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.			
3.4.5 LA01	3.4.1.2	CTS 3.4.1.2 contains a description of what constitutes an OPERABLE RCS loop. ITS 3.4.5 does not include a description of what constitutes an OPERABLE RCS loop. This changes the CTS by moving the details of what constitutes an OPERABLE RCS loop to the Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1
3.4.5 LA02	4.4.1.2.3	CTS 4.4.1.2.3 states that the "required reactor coolant loops shall be verified to be in operation and circulating reactor coolant." ITS Surveillance Requirement (SR) 3.4.5.1 states that the "required reactor coolant loops shall be verified to be in operation." This changes the CTS by moving the requirement to verify that the reactor coolant loops are circulating reactor coolant to the Bases. This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	3
3.4.5 LA03	3.4.1.2 Action b	CTS 3.4.1.2 specifies requirements for RCS loops when the Reactor Trip System breakers are in the closed position, and requirements for RCS loops when the Reactor Trip System breakers are in the open position. With only one RCS loop in operation and the Reactor Trip System breakers in the closed position, CTS 3.4.1.2, Action b requires the Reactor Trip System	ITS Bases	Technical Specification Bases Control Program	3

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.4.5 LA03 (continued)		breakers to be opened within 1 hour. ITS LCO 3.4.5.a specifies requirements for the RCS loops when the Rod Control System is capable of rod withdrawal. ITS LCO 3.4.5.b specifies requirements for the RCS loops when the Rod Control System is not capable of rod withdrawal. ITS 3.4.5 ACTION C requires the Rod Control System to be placed in a condition incapable of rod withdrawal when one required RCS loop is not in operation with the Rod Control System capable of rod withdrawal. This changes the CTS by moving the details on how to place the Rod Control System in a state capable or incapable of rod withdrawal (i.e., by using the Reactor Trip System breakers) from the TSs to the Bases. This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.			
3.4.6 LA01	3.4.1.3	CTS 3.4.1.3 provides the requirements for reactor coolant and/or RHR loops in MODE 4 and includes a description of what constitutes an OPERABLE loop. ITS 3.4.6 provides the requirements for reactor coolant and/or RHR loops in MODE 4 but does not include a description of what constitutes an OPERABLE loop. This changes the CTS by moving the details of what constitutes an OPERABLE coolant loop to the Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.4.6 LA02	4.4.1.3.3	CTS 4.4.1.3.3 states, in part, that required coolant loops shall be verified to be in operation and circulating reactor coolant. ITS SR 3.4.6.1 states, in part, that the required RHR or RCS loop shall be verified to be in operation. This changes the CTS by moving the requirement to verify that the reactor coolant loops are circulating reactor coolant to the Bases. This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	3
3.4.7 LA01	4.4.1.4.1.2	CTS 4.4.1.4.1.2 states, in part, that the required residual heat removal loop shall be verified to be in operation and circulating reactor coolant. ITS SR 3.4.7.1 states, in part, that the required RHR loop shall be verified to be in operation. This changes the CTS by moving the requirement to verify that the RHR loop is circulating reactor coolant to the Bases. This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	3
3.4.8 LA01	4.4.1.4.2.1	CTS 4.4.1.4.2.1 states, in part, that the required RHR loop shall be verified to be in operation and circulating reactor coolant. ITS Surveillance Requirement (SR) 3.4.8.1 states, in part, that the required RHR loop shall be verified to be in operation. This changes the CTS by moving the requirement to verify that the RHR loop is circulating reactor coolant to the Bases. This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	3

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.4.10 LA01	3.4.2.1 3.4.2.2	CTS 3.4.2.1 footnote** and CTS 3.4.2.2 footnote* modifies their respective LCOs by stating the pressurizer lift setting pressure shall correspond to ambient conditions of the valve at nominal operating temperature and pressure. This information is not provided in ITS 3.4.10. This changes the CTS by moving this information from the TSs to the Bases. This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	3
3.4.12 LA01	4.4.9.3.1.d	CTS SR 4.4.9.3.1.d states "While the PORVs are required to be OPERABLE, the backup nitrogen supply shall be verified OPERABLE in accordance with the Surveillance Frequency Control Program." ITS 3.4.12 does not contain this statement. This changes the CTS by removing the backup nitrogen supply surveillance. This change is designated as less restrictive removal of detail change since a backup nitrogen supply is being removed from TS.	TRM	10 CFR 50.59	4
3.4.12 LA02	4.4.9.3.3	CTS SR 4.4.9.3.3 states, in part, "is isolated by closed valves with power removed or by locked closed manual valves." ITS 3.4.12 does not contain this statement, but contains the statement, "is not capable of injecting into the RCS." This changes the CTS by removing the specific methods for isolating injection into the RCS. This change is designated as less restrictive removal of detail change since details are being removed from TS into the TS Bases.	ITS Bases	Technical Specification Bases Control Program	3

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.4.14 LA01	3.4.6.2 4.4.6.2.2	CTS 3.4.6.2 requires the leakage from each RCS PIV specified in Table 3.4-1 to be limited and CTS 4.4.6.2.2 requires the RCS PIVs in Table 3.4-1 to be periodically tested. ITS 3.4.14 does not contain nor make reference to an RCS PIV Table. This changes the CTS by relocating the list of the PIVs to the Bases. This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1
3.4.14 LA02	3.4.6.2.e	CTS LCO 3.4.6.2.e contains a footnote that states "Test pressure less than 2235 psig are allowed. Minimum differential test pressure shall not be less than 150 psid. Observed leakage shall be adjusted for the actual test pressure up to 2235 psig assuming the leakage to be directly proportional to pressure differential to the one-half power." ITS 3.4.14 does not contain this information. This changes the CTS by relocating the information in the footnote to the Bases. This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	3
3.4.14 LA03	4.4.6.2.2	CTS 3.4.6.2 SR 4.4.6.2.2 contains a footnote that states "To satisfy ALARA requirements, leakage may be measured indirectly (as from the performance of pressure indicators) if accomplished in accordance with approved procedures and supported by computations showing that the method is capable of demonstrating valve compliance with the leakage criteria." ITS 3.4.14 SRs do not contain this statement. This changes the CTS by relocating this statement to the Bases.	ITS Bases	Technical Specification Bases Control Program	1

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.4.13 LA04 (continued)		This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.			
3.4.14 LA04	3.4.6.2 Action c.2	CTS 3.4.6.2 Action c.2 states "The leakage (see LA03) from the remaining isolating valves in each high pressure line having a valve not meeting the criteria of Table 3.4-1, as listed in Table 3.4-1, shall be determined and recorded daily. The positions of the other valves located in the high pressure line having the leaking valve shall be recorded daily unless they are manual valves located inside containment." ITS 3.4.14 does not contain this statement. This changes the CTS by relocating this requirement to the TRM. This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.	TRM	10 CFR 50.59	3
3.4.16 LA01	4.4.8	CTS SR 4.4.8 refers to CTS Table 4.4-4 which requires a tritium activity determination and radiochemical isotopic determination including gaseous activity. ITS 3.4.16 does not contain these requirements. This changes the CTS by relocating the tritium activity determination and radiochemical isotopic determination including gaseous activity to the TRM. This change is designated as a less restrictive removal of detail change because tritium activity determination and radiochemical isotopic determination including gaseous activity are being removed from TS.	TRM	10 CFR 50.59	4

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.4.16 LA02	Table 4.4-4 Item 3 and 5	CTS Table 4.4-4 Item 3 and 5 requires an isotopic analysis to determine whether DEI-131 and DEX-133 concentration is within limit. ITS SR 3.4.16.2 and SR 3.4.16.1 require the verification that the reactor coolant DEI-131 and DEX-133 specific activity is within limit. ITS 3.4.16 Required Action A.1 requires the verification that DEI-131 is ≤ 60.0 μCi/gm. ITS 3.4.16 Required Action B.1 requires the verification that DEX-133 is within limits. This changes the CTS by moving the detail that an Isotopic Analysis for DEI-131, and DEX-133 must be performed to satisfy the requirements of the Surveillance and Action to the ITS Bases. This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	3
CTS 3/4.9.2 R01	3.4.9.2	Turkey Point Nuclear Generating Station (PTN) Current Technical Specification (CTS) 3.4.9.2 provides for the maximum cooldown and heatup temperatures per hour (shall not exceed 200 °F/hr and 100 °F/hr, respectively) for the Pressurizer and the maximum spray water temperature differential (>320 °F). The limits meet the requirements given in the ASME Boiler and Pressure Vessel Code, Section III, Appendix G. These limitations are consistent with structural analysis results. However, these limits are not initial condition assumptions of a Design Basis Accident (DBA) or transient. These limits represent operating restrictions and Criterion 2 includes operating restrictions. However, it should be noted that in the Final Policy Station the Criterion 2 discussion specified only those operating restrictions required to preclude unanalyzed accidents and transients be included in TSs. This Specification does not meet the criteria for retention in the ITS.	TRM	10 CFR 50.59	N/A

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
CTS 3/4.9.2 R01 (continued)		This change is designated as relocation because the Specification did not meet the criteria in 10 CFR 50.36(c)(2)(ii) and will be relocated to the TRM.			
CTS 3/4.11 R02	3.4.11	Turkey Point Nuclear Generating Station (PTN) Current Technical Specification (CTS) 3.4.11 requires at least one RCS vent path consisting of at least two vent valves in series powered from emergency busses to be OPERABLE and closed at the reactor vessel head and pressurizer steam space. These vents are provided to exhaust non-condensible gasses and or steam from the RCS that could inhibit natural circulation core cooling. Natural circulation is an alternate method of heat removal that is provided for in the TSs by requiring certain levels in the Steam Generators (when required) and certain water level above the reactor vessel flange during refueling. The RCS vents help facilitate natural circulation and are not included in the Improved Technical Specifications (ITS). This Specification does not meet the criteria for retention in the ITS. This change is designated as relocation because the Specification did not meet the criteria in 10 CFR 50.36(c)(2)(ii) and will be relocated to the TRM.	TRM	10 CFR 50.59	N/A
Refer to DOC section in ML23151A448		**Section 3.5, Emergency Core Cooling Systems (ECCS)**			
3.5.1 LA01	4.5.1.1	CTS SR 4.5.1.1 states "Verifying that each accumulator isolation valve is open by control room indication (power may be restored to the valve operator to perform this surveillance if redundant indicator is inoperable)." ITS SR 3.5.1.1 does not contain this statement. This changes the CTS by not including control room power indication for accumulator isolation valve to be open.	ITS Bases	Technical Specification Bases Control Program	3

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.5.1 LA01 (continued)		This change is designated as a less restrictive removal of detail change because procedural details are being removed from the Technical Specifications.			
3.5.2 LA01	3.5.2	CTS 3.5.2 lists the components and flow paths in the LCO and ACTIONs. ITS 3.5.2 does not list the components and flow paths in the LCO or ACTIONs. This changes the CTS by removing ECCS equipment and flow paths details from the LCO and ACTIONs to the Bases. This change is designated as a less restrictive removal of detail change because ECCS equipment and flow paths details is being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1
3.5.2 LA02	4.5.2.a	CTS SR 4.5.2.a contains a list of valves whose indicated positions are required to be verified by Control Room indication. One of the valves (HCV-758) contains a footnote that the air supply to the valve shall be verified shut off and sealed closed in accordance with the Surveillance Frequency Control Program (SFCP). ITS SR 3.5.2.1 does not contain this type of detail. This changes the CTS by moving the requirement out of Technical Specification. This change is designated as a less restrictive removal of detail change because SR details for meeting TS requirements are being removed from the TSs.	Surveillance Frequency Control Program	Surveillance Frequency Control Program	4
3.5.2 LA03	4.5.2.d	CTS SR 4.5.2.d requires a visual inspection of containment for loose debris that could be transported to the containment sump and restrict the suction of the pumps. This is required to be performed once daily and prior to establishing Containment Integrity. ITS 3.5.2 will not contain this surveillance. This changes the CTS by moving the requirement out of TSs.	TRM	10 CFR 50.59	4

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.5.2 LA03 (continued)		This change is designated as a less restrictive removal of detail change because SR details for meeting TS requirements are being removed from the TSs.			
3.5.2 LA04	4.5.2.f.2	CTS SR 4.5.2.f.2 is in terms of components. ITS SR 3.5.2.6 states "Verify each ECCS pump starts automatically on an actual or simulated actuation signal." This changes the CTS by moving components of CTS SR 4.5.2.f.2 to the Bases. This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	3
3.5.2 LA05	4.5.2.e.3	CTS SR 4.5.2 e.3 requires performance of a visual inspection of the containment sump and verification that the suction inlets are not restricted by debris and that the sump components (trash racks, screens, etc.) show no evidence of structural distress or abnormal corrosion. ITS SR 3.5.2.8 requires a similar surveillance but does not provide examples of the sump components. This changes the CTS by moving the example of sump components to the Bases. This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	3
3.5.2 LA06	4.5.2.a	CTS SR 4.5.2.a requires verifying valve position with power removed to the valve operators by control room indication. ITS SR 3.5.2.1 does not specify verifying valve position with power removed by control room indication. This changes the CTS by moving the method for meeting the SR, by control room indication, to the Bases.	ITS Bases	Technical Specification Bases Control Program	3

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.5.2 LA06 (continued)		This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.			
3.5.3 LA01	3.5.3	CTS 3.5.3 lists the components and flow paths required to be OPERABLE in the LCO. ITS 3.5.3 does not list the components and flow paths in the LCO. This changes the CTS by removing ECCS equipment and flow paths details from the LCO. This change is designated as a less restrictive removal of detail change because ECCS equipment and flow paths details is being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	3
3.5.4 LA01	4.5.4.b.2	CTS Surveillance Requirement (SR) 4.5.4.b.2 requires the verification of the RWST temperature at least once per 24 hours while the outside temperature exceeds its limit thereafter. ITS SR 3.5.4.1 also requires verification of the RWST temperature with a Frequency specified as, "In accordance with the Surveillance Frequency Control Program." This changes the CTS by moving the specified Frequency of "once per 24 hours" of this SR to the Surveillance Frequency Control Program (SFCP). This change is designated as a less restrictive removal of detail change because a Surveillance Frequency is being removed from the TSs.	Surveillance Frequency Control Program	Surveillance Frequency Control Program	5

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
Refer to DOC section in ML23151A449		**Section 3.6, Containment Systems**			
3.6.1 LA01	4.6.1.6.1 4.6.1.6.2	CTS 4.6.1.6.1 states, in part, "The containment tendons and the containment exterior surfaces shall be examined." CTS 4.6.1.2 states, in part, "The structural integrity of the end anchorages of all tendons inspected pursuant to Specification 4.6.1.6.1 and the containment concrete surfaces shall be demonstrated." Both CTS 4.6.1.6.1 and CTS 4.6.1.6.2 provide requirements for how these surveillances shall be performed and the associated acceptance criteria. ITS SR 3.6.1.2 states, "Verify containment structural integrity in accordance with the Pre-Stressed Concrete Containment Tendon Surveillance Program." ITS 5.5.4, "Pre-Stressed Concrete Containment Tendon Surveillance Program," provides controls for monitoring any tendon degradation in concrete containments, including effectiveness of its corrosion protection medium, to ensure containment structural integrity including performance, inspection frequencies, and acceptance criteria. This changes the CTS by moving the details of the surveillance to the Pre-Stressed Concrete Containment Tendon Surveillance Program. This change is designated as a less restrictive removal of detail change because details associated with performance of the containment structural integrity surveillances are being removed from the TSs.	ITS 5.5.4	Pre-Stressed Concrete Containment Tendon Surveillance Program 10CFR50.55a	3

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.6.1 LA02	4.6.1.6.3	CTS 4.6.1.6.3 states, in part, "In accordance with the Containment Leakage Rate Testing Program, a visual inspection of the accessible interior and exterior surfaces of the containment, including the liner plate, shall be performed." CTS 4.6.1.6.3 also provides requirements for how this surveillance shall be performed and associated acceptance criteria. ITS SR 3.6.1.1 states, "Perform required visual examinations and leakage rate testing except for containment air lock testing, in accordance with the Containment Leakage Rate Testing Program." ITS TS 5.5.13, "Containment Leakage Rate Testing Program," establish the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J. This changes the CTS by moving the guidance associated with the visual inspection of the accessible interior and exterior surfaces to the Containment Leakage Rate Testing Program. This change is designated as a less restrictive removal of detail change because details associated with performance of the containment visual examinations are being removed from the TSs.	ITS 5.5.13	Containment Leakage Rate Testing Program 10 CFR 50.54(o) 10 CFR 50, Appendix J, Option B	3
3.6.1 LA03	1.7	CTS 1.7 states, in part, "CONTAINMENT INTEGRITY shall exist when: a. All penetrations required to be closed during accident conditions are either: 1) Capable of being closed by an OPERABLE containment automatic isolation valve system, or 2) Closed by manual valves, blind flanges, or deactivated automatic valves secured in their closed positions, except for valves that are open under administrative control as permitted by Specification 3.6.4;	ITS Bases	Technical Specification Bases Control Program	2

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.6.1 LA03 (continued)		b. The equipment hatch is closed and sealed; c. Each air lock is in compliance with the requirements of Specification 3.6.1.3; and e. The sealing mechanism associated with each penetration (e.g., welds, bellows, or O-rings) is OPERABLE. ITS 3.6.1 states "Containment shall be OPERABLE." This changes the CTS by moving the reference to penetration, equipment hatch and, air lock requirements to the Bases. This change is designated as a less restrictive removal of detail change because information relating to system operation is being removed from the TSs.			
3.6.2 LA01	3.6.1.3	CTS 3.6.1.3 states each containment air lock shall be OPERABLE with a) both doors closed except when the air lock is being used for normal transit entry and exit through the containment, or during the performance of containment air lock surveillance and/or testing requirements, then at least one air lock door shall be closed, and b) an overall air lock leakage rate in accordance with the Containment Leakage Rate Testing Program. ITS 3.6.2 does not contain this level of detail. This changes the CTS by moving details concerning what constitutes an OPERABLE containment air lock to the Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.6.3 LA01	4.6.4.2	CTS 4.6.4.2 states that each containment isolation valve shall be demonstrated OPERABLE by verifying that on a "Phase A," "Phase B," or "Containment Ventilation" isolation signal, each "Phase A," "Phase B," and "Containment Purge and Exhaust" isolation valve, respectively, actuates to its isolation position. ITS SR 3.6.3.6 requires verification that each automatic containment isolation valve that is not locked, sealed, or otherwise secured in position, actuates to the isolation position on an actual or simulated actuation signal. This changes the CTS by moving the detail concerning what type of signals are used to conduct the SR to the Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1
3.6.3 LA02	4.6.1.7.1	CTS SR 4.6.1.7.1 states that each containment purge supply and exhaust isolation valve shall be verified to be administratively sealed closed and deactivated in accordance with the Surveillance Frequency Control Program. ITS SR 3.6.3.1 contains similar wording with the exception that the containment purge supply and exhaust isolation valves can be verified administratively. This changes the CTS by moving the CTS allowance that verification of valve position is performed administratively to the ITS Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.6.5 LA01	3.6.1.5	CTS 3.6.1.5 includes a Note that states that equivalent hours are determined from actual hours using the time-temperature relationships that support the environmental qualification requirements of 10 CFR 50.49. CTS 4.6.1.5 requires the primary containment average air temperature to be the arithmetical average of the temperatures at the listed approximate locations. ITS LCO 3.6.5 does not include this Note and ITS Surveillance Requirement (SR) 3.6.5.1 requires verification that containment average air temperature is within limit. This changes the CTS by moving the description of how compliance with the TS LCO is determined to the Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1
3.6.6 LA01	3.6.2.1	CTS 3.6.2.1 states that two independent containment spray systems shall be OPERABLE with each Spray System capable of taking suction from the Refueling Water Storage Tank (RWST) and manually transferring suction to the containment sump via the Residual Heat Removal (RHR) System. ITS LCO 3.6.6 requires two containment spray systems to be OPERABLE. This changes the CTS by moving the detail that the train must be "independent," and the details of what composes an OPERABLE containment spray subsystem to the Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.	ITS Bases	Technical Specifications Bases Control Program	1

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.6.6 LA02	4.6.2.1.d.2	CTS 4.6.2.1.d.2 requires each spray pump to be started automatically and states "the manual isolation valves in the spray lines at the containment shall be locked closed for the performance of these tests." ITS Surveillance Requirement (SR) 3.6.6.7 states to verify each containment spray pump starts automatically on an actual or simulated actuation signal. This changes the CTS by moving the details of how to perform the test to the Bases. This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the Technical Specifications.	ITS Bases	Technical Specifications Bases Control Program	3
3.6.6 LA03	4.6.2.1.e	CTS 4.6.2.1.e states to perform "an air or smoke flow test through each spray header" to verify each spray nozzle is unobstructed. ITS SR 3.6.6.9 states to verify each spray nozzle is unobstructed. This changes the CTS by moving the details of how to perform the test to the Bases. This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.	ITS Bases	Technical Specifications Bases Control Program	3

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
Refer to DOC section in ML23151A450		**Section 3.7, Plant Systems**			
3.7.1 LA01	Table 3.7-2	CTS Table 3.7-2 is modified by a footnote (footnote*) that states, "The lift setting pressure shall correspond to ambient conditions of the valve at nominal operating temperature and pressure." ITS 3.7.1 does not contain this information. This changes the CTS by moving details on setting the lift pressure to the ITS Bases. This change is designated as a less restrictive removal of detail change because details for meeting TS requirements are being removed from the TSs to the ITS Bases.	ITS Bases	Technical Specification Bases Control Program	3
3.7.1 LA02	Table 3.7-2	CTS Table 3.7-2 specifies the MSSV number and associated lift settings and nozzle size for each MSSV. ITS Table 3.7.1-2 only provides the MSSV number and associated lift setting. This changes the CTS by deleting the required nozzle size and relocating this detail to the Updated Final Safety Analysis Report (UFSAR). This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.	UFSAR	10 CFR 50.59	1
3.7.2 LA01	3.7.1.5	CTS 3.7.1.5 requirement to verify the closure time of the MSIV contains the actual closure time of 5 seconds. ITS 3.7.2 requires verification of the isolation time of the MSIV but does not include the isolation time. This changes the CTS moving the actual closure time acceptance criteria from the TS to the TS Bases.	ITS Bases	Technical Specification Bases Control Program	1

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.7.2 LA01 (continued)		This change is designated as a less restrictive removal of detail change because MSIV closure times is being removed from the TSs.			
3.7.4 LA01	Table 4.7-1, Item 2	CTS Table 4.7-1, Item 2 requires an isotopic analysis to determine whether DOSE EQUIVALENT I-131 concentration is within limit. ITS SR 3.7.4.1 requires the verification that specific activity of the secondary coolant is within limit. This changes the CTS by moving the detail that an isotopic analysis must be performed to satisfy the requirements of the Surveillance to the Bases. This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	3
3.7.4 LA02	Table 4.7-1 Item 2	CTS 4.7.1.4 requires that the specific activity of the secondary coolant system shall be determined to be within the limit by performance of the sampling and analysis program of Table 4.7-1. CTS Table 4.7-1, Item 2, lists a sample frequency of once per 31 days that can be extended if the gross activity determination indicates iodine concentration is below 10% of the allowable limit. ITS SR 3.7.4.1 requires a similar Surveillance and specifies the periodic Frequency as, "In accordance with the Surveillance Frequency Control Program." This changes the CTS by moving the specified Frequency for this SR and associated Bases (once per 31 days) to the Surveillance Frequency Control Program. This change is designated as a less restrictive removal of detail change because the Surveillance Frequency is being removed from the TSs.	Surveillance Frequency Control Program	Surveillance Frequency Control Program	5

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.7.5 LA01	LCO 3.7.1.2	CTS LCO 3.7.1.2 requires two independent auxiliary feedwater trains including 3 steam supply flowpaths, 3 pumps (changed to 2 under DOC L01) and associated discharge water flowpaths shall be OPERABLE. The CTS LCO also contains footnotes further describing specifics that are required in each AFW train. ITS LCO 3.7.5 states "Two AFW trains and three steam generator steam supplies shall be OPERABLE." The ITS does not include design details, components and associated flow paths that comprise an OPERABLE AFW train. This changes the CTS by moving the description of the AFW independence, trains, and components required for OPERABILITY to the Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1
3.7.5 LA02	4.7.1.2.1.a.1 4.7.1.2.1.a.2	CTS 4.7.1.2.1.a.1) and CTS 4.7.1.2.1.a.2) state, in part, to verify equipment performance, "by control panel indication and visual observation of equipment…". ITS 3.7.5 does not include this guidance on how to verify equipment performed as required. This changes the CTS by removing procedural details for meeting TS requirements. This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	3
3.7.6 LA01	LCO 3.7.1.3 3.7.1.3 Actions	CTS 3.7.1.3 provides OPERABILITY allowances (in either or both condensate storage tanks) and Actions based on the opposite unit's MODE and required indicated water volumes (210,000 gallons or 420,000 gallons). ITS 3.7.6 does not include these details of	ITS Bases	Technical Specification Bases Control Program	1

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.7.6 LA01 (continued)		system design and limitations in the LCO or ACTIONS sections but provides the level requirements in the Surveillance Requirements section with the description of the system design and limitations included in the Bases for the Surveillance Requirements. This changes the CTS by describing the CST System alignment and associated interactions in the Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.			
3.7.6 LA02	3.7.1.3 Action 2	CTS 3.7.1.3 ACTIONS provides guidance on which ACTION applies to both units. ITS 3.7.6 does not include these details of system design and limitations in the ACTIONS but provides the details of which Conditions apply to one or both units in the Bases. This changes the CTS by removing the specific information on which ACTION applies to both units placing it in the Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1
3.7.7 LA01	LCO 3.7.2 3.7.2 Action b	CTS 3.7.2 requires the Component Cooling Water System (CCW) to be OPERABLE with: a. Three CCW pumps, and b. Two CCW heat exchangers (Changed to two CCW pumps by DOC L01). CTS 3.7.2, Action b, states that with only one CCW pump OPERABLE or with two CCW pumps OPERABLE, but not from independent power supplies, restore two pumps from independent power supplies to OPERABLE status. ITS LCO 3.7.7 requires two CCW trains to be OPERABLE but does not define the components, independence, and the	ITS Bases	Technical Specification Bases Control Program	1

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.7.7 LA01 (continued)		associated flow path that comprise an OPERABLE CCW train. This changes the CTS by moving the description of the CCW trains to the Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.			
3.7.8 LA01	LCO 3.7.3 3.7.3 Action b	CTS 3.7.3 requires the Intake Cooling Water System (ICW) to be OPERABLE with: a. Three ICW pumps, and b. Two ICW headers (Two ICW pumps by DOC L01). CTS 3.7.3 Action b states that with only one ICW pump OPERABLE or with two ICW pumps OPERABLE, but not from independent power supplies, restore two pumps from independent power supplies to OPERABLE status. ITS LCO 3.7.8 requires two ICW trains to be OPERABLE but does not define the components the associated flow path and independence that comprise an OPERABLE ICW train while Condition A states with one ICW train inoperable. This changes the CTS by moving the description of an OPERABLE ICW train to the Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1
3.7.9 LA01	4.7.4	CTS 4.7.4 provides the requirements for verifying the UHS average supply water temperature is within limits. CTS 4.7.4 includes a footnote that states, "Portable monitors may be used to measure the temperature." ITS 3.7.9 does not include this footnote. This changes the CTS by moving an allowable method of measuring the supply temperature to the Bases.	ITS Bases	Technical Specification Bases Control Program	3

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.7.9 LA01 (continued)		This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.			
3.7.10 LA01	LCO 3.7.5	CTS LCO 3.7.5 lists the components that comprise the CREVS which are required to be OPERABLE. ITS 3.7.10 does not list the components in the LCO. This changes the CTS by removing the specific components that comprise the CREVS from the TSs to the TS Bases. This change is designated as a less restrictive removal of detail change because CREVS components are being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1
3.7.10 LA02	4.7.5.b 4.7.5.c.1 4.7.5.c.2 4.7.5.c.3 4.7.5.d.1 4.7.5.d.2 4.7.5.f	A footnote is associated with CTS Surveillance Requirements (SRs) 4.7.5.b, 4.7.5.c.1, 4.7.5.c.2, 4.7.5.c.3, 4.7.5.d.1, 4.7.5.d.2, and 4.7.5.f that require these SRs to be performed on the compensatory filtration unit. ITS 3.7.10 does not contain any requirements to perform SRs on the compensatory filtration unit. This changes the CTS by removing the requirements to perform SRs on the compensatory filtration unit out of TSs to the TRM. This change is designated as a less restrictive removal of detail change because the compensatory filtration unit SRs are being removed from the TSs.	TRM	10 CFR 50.59	4
3.7.11 LA01	LCO 3.7.5.b	CTS 3.7.5 lists the components that comprise the CREATCS which are required to be OPERABLE in the LCO. ITS 3.7.11 does not list the components in the LCO. This changes the CTS by removing the specific components that comprise the CREATCS from the TSs to the TS Bases.	ITS Bases	Technical Specification Bases Control Program	1

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.7.11 LA02 (continued)		his change is designated as a less restrictive removal of detail change because CREATCS components are being removed from the TSs.			
3.7.14 LA01	4.9.14.2	CTS SR 4.9.14.2 states, "A representative sample of inservice metamic inserts shall be visually inspected in accordance with the Metamic Surveillance Program described in UFSAR Section 16.2. The surveillance program ensures that the performance requirements of Metamic are met over the surveillance interval." ITS 3.7.14 does not contain this SR. This changes the CTS by moving a SR out of TSs and into the TRM. This change is designated as a less restrictive removal of detail because an SR is being moved from the TSs to the TRM.	TRM	10 CFR 50.59	4
CTS 3/4.7.6 R01	3.7.6	In the conversion of the Turkey Point Nuclear Generating Station (PTN) CTS) to the plant specific ITS, CTS 3.7.6 provides requirements for all safety-related snubbers. This specification, with the exception of the Action to restore an inoperable snubber within 72 hours, is not included in the ITS. This changes the CTS by moving the explicit snubber requirements from the TSs to the TRM. This change is designated as relocation because the Specification does not meet the criteria in 10 CFR 50.36(c)(2)(ii) and will be relocated to the TRM.	TRM	10 CFR 50.59	N/A
CTS 3/4.7.7 R01	3.7.7	CTS 3.7.7 provides the requirements that each sealed source containing radioactive material either in excess of 100 microCuries of beta and/or gamma emitting material or 5 microCuries of alpha emitting material shall be free of greater than or equal to 0.005 microCurie of removable contamination.	TRM	10 CFR 50.59	N/A

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
CTS 3/4.7.7 R01 (continued)		This change is designated as relocation because the Specification does not meet the criteria in 10 CFR 50.36(c)(2)(ii) and will be relocated to the TRM.			
Refer to DOC section in ML23151A451		**Section 3.8, Electrical Power Systems**			
3.8.1 LA01	3.8.1.1.a	CTS 3.8.1.1.a requires two startup transformers and the associated circuits to be OPERABLE. CTS Actions and SRs identify 1) startup transformers and/or the/its associated circuits, and 2) startup transformer(s). ITS LCO 3.8.1 requires two qualified circuits between the offsite network and the onsite Class 1E AC Electrical Distribution System, and ITS Actions and SRs label these circuits offsite circuits. This changes the CTS by moving the details that the offsite circuits are "independent" or "physically independent," and that the offsite circuits contain startup transformers and associated circuits from the CTS to the TS Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1
3.8.1 LA02	3.8.1.1.b	CTS 3.8.1.1.b requires three "separate and independent" EDG sets to be OPERABLE. ITS LCO 3.8.1 requires EDGs capable of supplying the onsite Class 1E AC Electrical Distribution System. This changes the CTS by moving the details that the EDGs are "separate and independent," from the CTS to the Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.8.1 LA03	3.8.1.1.b	CTS 3.8.1.1.b requires three separate and independent diesel generators to be OPERABLE and includes specific supporting requirements. CTS 3.8.1.1.b.1.f and 3.8.1.1.b.2.d require specific motor control center (MCC) buses to be energized for specific EDGs. ITS LCO 3.8.1 does not include a discussion regarding MCCs energized for specific EDGs. This changes the CTS by moving the design details regarding MCCs for specific EDGs from the CTS to the Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1
3.8.1 LA04	3.8.1 Action b.2 Action c.2	CTS 3.8.1, ACTION b.2 and ACTION c.2, state, in part, that if the EDG became inoperable due to any cause other than an inoperable support system, an independently testable component, or preplanned preventative maintenance or testing, to demonstrate the OPERABILITY of the remaining required EDGs by performing SR 4.8.1.1.2.a.4 within 24 hours. In addition, CTS 3.8.1, ACTION c.2, states, in part, to demonstrate the OPERABILITY of the remaining required EDGs by performing SR 4.8.1.1.2.a.4 within 8 hours unless the EDGs are already operating. ITS 3.8.1, Required Action C.3.1, states to determine OPERABLE EDG(s) is not inoperable due to common cause failure. This changes the CTS by removing the details of what is not a potential common mode failure. This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	3

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.8.1 LA05	4.8.1.1.2.a.4	CTS SR 4.8.1.1.2.a.4 states, in part, that the EDG shall be started for this test by using one of the following signals: a) Manual, b) Simulated loss-of-offsite power by itself, c) Simulated loss-of-offsite power in conjunction with an ESF Actuation test signal, or d) An ESF Actuation test signal by itself. ITS SR 3.8.1.6 does not include this information associated with the specific test signal that must be used to start this test. This changes the CTS by removing the details of the specific test signal that must be used to start this test. This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	3
3.8.1 LA06	4.8.1.1.2.a.4	CTS SR 4.8.1.1.2.a.4 states, in part, that the EDG shall be synchronized loaded for Unit 3 until automatic transfer of fuel from the day tank to the skid mounted tank is demonstrated, and the cooling system is demonstrated OPERABLE. ITS SR 3.8.1.2 does not include this information associated with the specific test acceptance requirements. This changes the CTS by removing the details of the specific test acceptance requirements. This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	3
3.8.1 LA07	N/A	Not used.	N/A	N/A	N/A

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.8.1 LA08	4.8.1.1.2.g.2	CTS SR 4.8.1.1.2.g.2 requires verification of each EDG's capability to reject a load of greater than or equal to 392 kW while maintaining voltage and frequency within specified ranges. ITS SR 3.8.1.8 requires a similar verification but does not specify the value of the single largest post-accident load to reject. This changes the CTS by moving the detail of the single largest load to the ITS Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1
3.8.1 LA09	4.8.1.1.2.g	SR CTS 4.8.1.1.2.g states that each EDG shall be demonstrated OPERABLE by verifying that the fuel transfer pump transfers fuel from the fuel storage tank (Unit 3), fuel storage tanks (Unit 4) to the day tanks of each diesel associated with the unit via the installed cross-connection lines. ITS 3.8.1 does not include this SR. This changes the CTS by the removal of this SR and placing it in the TRM. This change is designated as a less restrictive removal of detail change because a surveillance requirement is being removed from the TSs.	TRM	10 CFR 50.59	4
3.8.1 LA10	3.8.1.1.b.1.a	CTS 3.8.1.1.b.1.a states, in part, that an OPERABLE EDG includes a separate skid-mounted fuel tank and a separate day fuel tank with an OPERABLE solenoid valve to permit gravity flow from the day tank to the skid mounted tank. ITS SR 3.8.1.3 requires verification that each EDG has the following fuel oil volume: a) Unit 3 EDGs day tank and skid tank contains ≥ 2000 gallons of fuel oil, and b) Unit 4 EDGs day tank contains ≥ 230	ITS Bases	Technical Specification Bases Control Program	3

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.8.1 LA10 (continued)		gallons of fuel oil. This changes the CTS by not including the procedural details that the Unit 3 EDG fuel oil requirement includes an OPERABLE solenoid valve to permit gravity draining of fuel oil from the day tank to the skid tank. This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.			
3.8.2 LA01	3.8.1.2, Applicability Footnote	CTS 3.8.1.2, Applicability Footnote * states "CAUTION - If the opposite unit is in MODES 1, 2, 3, or 4 see Specification 3.8.1.1." ITS 3.8.2, Applicability does not include this Footnote. This changes the CTS by removing the procedural details cautioning the operator to refer to CTS Specification 3.8.1.1 (ITS 3.8.1) for the opposite unit if the opposite unit is in MODES 1, 2, 3, or 4. This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	3
3.8.3 LA01	3.8.1.1.b.1)b 3.8.1.1.b.2)b 3.8.1.2.b.2 3.8.1.1.b.1)d	CTS 3.8.1.1.b.1)b, CTS 3.8.1.1.b.2)b, and CTS 3.8.1.2.b.2 require a separate fuel storage system containing a minimum volume of 38,000 gallons of fuel for Unit 3 and 34,700 gallons of fuel for Unit 4. CTS 3.8.1.1.b.1)d requires lubricating oil storage containing a minimum volume of 120 gallons of lubricating oil for Unit 3 EDGs. ITS SR 3.8.3.1 and SR 3.8.3.2 require verifying that each fuel oil storage tank contains ≥ a 7-day supply of fuel oil and the lubricating oil inventory is ≥ a 7-day supply when the associated EDG is required to be OPERABLE. This changes the CTS by	ITS Bases	Technical Specification Bases Control Program	1

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.8.3 LA01 (continued)		moving the specific values for the fuel oil and lube oil inventory to the TS Bases. This change is designated as less restrictive removal of detail change because details are being moved from TS to the ITS Bases.			
3.8.3 LA02	3.8.1.1.b.1)e	CTS 3.8.1.1.b.1)e requires that the Operability of a Unit 3 EDG includes the capability to transfer lubricating oil from storage to the EDG unit. ITS SR 3.8.3.2 requires verifying lubricating oil inventory is ≥ a 7-day supply. This changes the CTS by removal of an explicit LCO requirement for Unit 3 EDGs. This change is designated as a less restrictive removal of detail change because the verification of the capability to transfer lubricating oil from storage to the EDG unit is being removed from TSs.	ITS BASES	Technical Specification Bases Control Program	1
3.8.3 LA03	4.8.1.1.2.i 4.8.1.1.2.j	CTS 4.8.1.1.2.i requires that, in accordance with the Surveillance Frequency Control Program, to drain each fuel oil storage tank, remove the accumulated sediment, and clean the tank. CTS 4.8.1.1.2.j requires at least once per 10 years, for Unit 4 only, to perform a pressure test of those portions of the diesel fuel oil system designed to Section III, subsection ND of the ASME Code in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. ITS 3.8.3 does not include these requirements for the fuel oil storage tanks. This changes the CTS by moving these fuel oil storage tank requirements from the TSs to the TRM.	TRM	10 CFR 50.59	4

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.8.3 LA03 (continued)		This change is designated as a less restrictive removal of detail change because information is being removed from TSs.			
3.8.4 LA01	3.8.2.1	CTS 3.8.2.1 states that the DC electrical sources shall be OPERABLE and lists the details of what constitutes a DC electrical source. ITS LCO 3.8.4 states that four DC electrical power trains shall be OPERABLE. This changes the CTS by moving the details of what constitutes an OPERABLE DC electrical power train (battery and charger) from the CTS to the ITS Bases. This change is designated as a less restrictive removal of detail change because information related to system design is being removed from TSs.	ITS Bases	Technical Specification Bases Control Program	1
3.8.4 LA02	3.8.2.1	CTS 3.8.2.1 states that the DC electrical sources shall be OPERABLE and includes two footnotes, * and #. CTS 3.8.2.1 footnote * states that all battery chargers required to satisfy the LCO shall be powered from separate MCCs. Footnote # states that inoperability of the required emergency diesel generators (EDGs) specified in the LCO requirements below does not constitute inoperability of the associated battery chargers or battery banks. ITS LCO 3.8.4 states that Train A and Train B of the DC electrical power subsystem shall be OPERABLE. This changes the CTS by moving the details of what constitutes an OPERABLE battery charger or battery bank from the CTS to the ITS Bases. This change is designated as a less restrictive removal of detail change because information related to system design is being removed from TSs.	ITS Bases	Technical Specification Bases Control Program	1

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.8.4 LA03	4.8.2.1.a.2	CTS 4.8.2.1.a.2 requires verifying total battery terminal voltage to be greater than or equal to 129 volts on float charge and the battery charger(s) output voltage to be ≥ 129 volts. ITS SR 3.8.4.1 requires the verification that the battery terminal voltage is greater than or equal to the minimum established float voltage. This changes the CTS by moving the specific values of the minimum established float voltage from the CTS to the ITS Bases. This change is designated as a less restrictive removal of detail change because information related to system design is being removed from TSs.	ITS Bases	Technical Specification Bases Control Program	1
3.8.4 LA04	4.8.2.1.a.3	CTS 4.8.2.1.a.3 states that if two battery chargers are connected to the battery bank, verify each battery charger is supplying a minimum of 10 amperes, or demonstrate that the battery charger supplying less than 10 amperes will accept and supply the DC bus load independent of its associated battery charger. ITS 3.8.4 surveillances do not include this requirement. This changes the CTS by removal of the battery charger parallel load sharing requirement to the TRM. This change is designated as a less restrictive removal of detail change because a battery charger parallel load sharing requirement is being removed from the TSs.	TRM	10 CFR 50.59	4
3.8.4 LA05	4.8.2.1.c.3	CTS 4.8.2.1.c.3 requires that each 400 amp battery charger (associated with Battery Banks 3A and 4B) will supply at least 400 amperes at ≥ 129 volts for at least 8 hours, and each 300 amp battery charger (associated with Battery Banks 3B and 4A) will supply at least 300 amperes at ≥ 129 volts for at least 8 hours. ITS SR 3.8.4.2 requires the verification that each battery charger supplies ≥ 400 amps (battery chargers associated with Battery Banks 3A and 4B) and ≥ 300 amps (battery	ITS Bases	Technical Specification Bases Control Program	1

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.8.4 LA05 (continued)		chargers associated with Battery Banks 3B and 4A) at greater than or equal to the minimum established float voltage for ≥ 8 hours. This changes the CTS by moving the specific values of the minimum established float voltage from the CTS to the ITS Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.			
3.8.5 LA01	3.8.2.2	CTS 3.8.2.2 states, in part, three 125 volt battery banks, each with at least one associated full capacity charger capable of being powered by an OPERABLE EDG, shall be OPERABLE. ITS LCO 3.8.5 requires three trains of the DC electrical power subsystem to be OPERABLE. This changes the CTS by moving the details of a train of the DC electrical power subsystem from the CTS to the Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1
3.8.6 LA01	4.8.2.1.e	CTS 4.8.2.1.e states, in part, that degradation is indicated when the battery capacity drops more than 10% [7% for Batteries 4B and D52 (Spare) when used in place of Battery 4B] of rated capacity from its average on previous performance tests, or is below 90% [93% for Batteries 4B and D52 (Spare) when used in place of Battery 4B] of the manufacturer's rating. ITS 3.8.6 does not include this description of degradation. This changes the CTS by removing the description of what is indicative of battery degradation.	ITS Bases	Technical Specification Bases Control Program	1

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.8.6 LA01 (continued)		This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.			
3.8.6 LA02	4.8.2.1.b.1	CTS 4.8.2.1.b.1 requires verifying that the parameters in Table 4.8-2 meet the Category B. CTS Table 4.8-2 includes the electrolyte level Category B limits for each connected cell that must be verified of that the battery electrolyte level is > the minimum level indication mark, and ≤ ¼ inch above maximum level indication mark in accordance with the Surveillance Frequency Control Program (SFCP). ITS SR 3.8.6.3 requires a similar Surveillance and specifies the acceptance criteria as "greater than or equal to the minimum established design limits." The minimum established design limits for battery electrolyte level will be placed in the ITS Bases. This changes the CTS by moving the specified limits for this SR to the ITS Bases. This change is designated as a less restrictive removal of detail change because the Surveillance limits are being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1
3.8.7 LA01	3.8.3.1	CTS 3.8.3.1 states, in part, that the following electrical busses* shall be energized in the specified manner, listing the 120 volt AC Vital Panels as Items d through k, with the manner of energization being the associated inverter connected to the specified DC bus (e.g., its associated inverter connected to DC Bus 3B). In addition, footnote **** states that a back-up inverter may be used to replace the normal inverter provided the normal inverter on the same DC bus for the opposite unit is not replaced at the same time. ITS 3.8.7 does not contain this level of detail information. This changes the CTS by moving the level of detail of inverter alignment to	ITS Bases	Technical Specification Bases Control Program	1

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.8.7 LA01 (continued)		the DC bus and details that a back-up inverter may be used to replace the normal inverter to the ITS Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.			
3.8.8 LA01	3.8.3.2 footnote	CTS 3.8.3.2 footnote ** states that a backup inverter may be used to replace the normal inverter provided the normal inverter on the same DC bus for the opposite unit is not replaced at the same time. ITS 3.8.8 requires, in part, the inverters to be OPERABLE. This changes the CTS by moving this level of detail information into the ITS Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1
3.8.8 LA02	3.8.3.2	CTS 3.8.3.2 states, in part, that as a minimum, the following electrical busses shall be energized in the specified manner, listing two 120-volt AC vital busses for the unit, and energized from their associated inverters** connected to their respective DC busses. ITS 3.8.8 LCO states that two inverters shall be OPERABLE. This changes the CTS by moving this level of detail information into the ITS Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.8.9 LA01	3.8.3.1	CTS 3.8.3.1 requires, in part, that the following electrical busses* shall be energized and lists the specific AC buses, 120 Volt AC Vital Panels and 125 Volt DC buses required to be energized. ITS LCO 3.8.9 requires electrical power distribution subsystems shall be OPERABLE but does not list specific electrical buses and panels. This changes the CTS by moving the specific names of the buses and panels, the associated nominal voltages (i.e., 4160 V, 480 V, 125 V, and 120 V), and associated footnotes from the CTS to the ITS Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1
3.8.9 LA02	3.8.3.1	CTS 3.8.3.1 requires that electrical busses* shall be energized in the specified manner with the tie breakers open between redundant busses within the unit** and between the busses of Units 3 and 4. CTS 3.8.3.1 Footnote ** states that with the opposite unit in MODE 5, 6, or defueled, its 480Volt Load Center can be cross-tied under conditions specified in Specification 3.8.3.2.a. ITS LCO 3.8.9 requires the applicable electrical power distribution subsystems to be OPERABLE and ITS Surveillance Requirement (SR) 3.8.9.1 requires the verification of correct breaker alignments and voltage to required AC, DC, and AC vital electrical power distribution subsystems buses and panels. This changes the CTS by moving the procedural detail that the buses must have the tie breakers open between redundant buses from the CTS to the ITS Bases.	ITS Bases	Technical Specification Bases Control Program	3

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.8.9 LA02 (continued)		This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.			
3.8.9 LA03	3.8.3.1	CTS 3.8.3.1 requires two unit trains and one opposite unit train of AC buses to be OPERABLE and lists the required AC buses, including the respective 4160V bus, specific 480V load centers (LCs), and specific 480 V motor control centers (MCCs). The * footnote to CTS LCO 3.8.3.1 states that for Motor Control Center buses, vital section only applies. CTS 3.8.3.1, Action a, provides an exception to the condition where one of the required trains of emergency busses are not fully energized. The exception states, "except for the required LC's and MCC's associated with the opposite unit." CTS 3.8.3.1, Action b, provides the required actions for the condition with any of the required LC's and/or MCC's associated with the opposite unit inoperable. The required actions stated in Action b is to restore the inoperable LC or MCC to OPERABLE status in accordance with Table 3.8-1 or Table 3.8-2, as applicable, or shut the unit down. CTS Tables 3.8-1 and 3.8-2 provide specific allowable outage times (AOTs) for opposite unit inoperable LCs or MCCs based on required LC and MCCs. ITS LCO 3.8.9 requires two unit AC electrical power distribution trains and the required opposite unit AC electrical power distribution train(s) that support equipment required by LCO 3.5.2, "ECCS – Operating," LCO 3.7.10, "Control Room Emergency Ventilation System (CREVS)," LCO 3.7.11, "Control Room Emergency Air Temperature Control System (CREATCS)," and LCO 3.8.4, "DC Sources – Operating," to be OPERABLE. ITS LCO 3.8.9 does not specify specific LCs and MCCs or specific actions for the opposite unit LCs and MCCs. This	TRM	10 CFR 50.59	4

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.8.9 LA03 (continued)		changes the CTS by relocating the unit MCCs and opposite unit LCs and MCCs and associated actions to the TRM. This change also relocates the detail that the requirements only apply to the vital section of the MCCs. This change is designated as a less restrictive removal of detail change because the specific AC electrical power distribution system LCs and MCCs as association ACTIONS are being removed from the TSs.			
3.8.9 LA04	LCO 3.8.3.1.l, m, n, and o	CTS LCO 3.8.3.1.l, m, n, and o, states, in part, that each 125 Volt D.C. Bus (3D01, 3D23, 4D01, and 4D23) must be energized from an associated battery charger and from its associated Battery Bank (3A, 3B, 4B, or 4A, respectively) or spare battery bank D-52. ITS LCO 3.8.9 states, "The following electrical power distribution trains and subsystems shall be OPERABLE: . . . ." ITS LCO 3.8.9 item c. includes in ITS LCO 3.8.9 OPERABILITY requirements four DC electrical power distribution trains. This changes the CTS by moving the specific detail of what constitutes an OPERABLE DC electrical power distribution train from the CTS to the ITS Bases. This change is designated as a less restrictive removal of detail change because information relating to system design is being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	1

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
Refer to DOC section in ML23151A452		**Section 3.9, Refueling Operations**			
3.9.1 LA01	3.9.1	CTS 3.9.1 requires that the boron concentration in MODE 6 be maintained uniform and sufficient to ensure that the more restrictive reactivity condition of a k_{eff} of 0.95 or less; or a boron concentration of greater than or equal to 2300 ppm, is met. ITS LCO 3.9.1 requires the boron concentration of the RCS, the refueling canal, and the refueling cavity to be maintained within limit specified in the COLR. This changes the CTS by moving the MODE 6 boron concentration limits, which must be confirmed on a cycle-specified basis, to the COLR. This change is designated as a less restrictive removal of detail change because information relating to a cycle-specific parameter limit is being removed from the TSs.	SR 3.9.1.1	10 CFR 50.59 ITS 5.6.3	6
3.9.1 LA02	4.9.1.2	CTS 4.9.1.2 requires that the boron concentration of the RCS and the refueling canal be determined "by chemical analysis" in accordance with the SFCP. ITS SR 3.9.1.1 specifies the boron concentration of the RCS verified within the limits of the COLR in accordance with the SFCP. The ITS does not specify the boron concentration be determined by chemical analysis. This changes the CTS by moving the detail, that the boron concentration of the refueling canal be included and that the boron concentration be determined by "chemical analysis," to the ITS Bases. The CTS requirement that also includes the refueling cavity in the boron concentration verification and the addition that the limits be located in the COLR is discussed in DOCs A03 and M01, respectively.	ITS Bases	Technical Specification Bases Control Program	3

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.9.1 LA02 (continued)		This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.			
3.9.4 LA01	LCO 3.9.4.b.2 & 3	CTS LCO 3.9.4.b.2 & 3 contain the requirements for having less than two airlock doors closed. ITS LCO 3.9.4 contains only the requirement that at least one personnel airlock is capable of being closed. The ITS does not contain the requirement for the unit to be in MODE 6 with 23 feet of water above the reactor vessel flange and that a designated individual is available outside the personnel airlock to close the door. This changes the CTS by not including in the ITS all the requirements to have less than two containment airlock doors closed. This change is designated as a less restrictive removal of detail change because the existing requirements for having less than two doors in the airlock closed is being removed from TSs.	LCO 3.9.4 ITS Bases	Technical Specification Bases Control Program	3
3.9.4 LA02	LCO 3.9.4.c.	CTS LCO 3.9.4.c. contains a footnote that specifies the exceptions for opening containment isolation valves (CIVs), surveillances and testing requirements. ITS LCO 3.9.4 does not list specific exceptions for allowing the opening of valves under administrative controls. This changes the CTS by not including the exceptions for allowing the opening of CIVs under administrative controls. This change is designated as a less restrictive removal of detail change because existing exceptions for allowing the CIVs to be opened under administrative controls is being removed from TSs.	ITS Bases	Technical Specification Bases Control Program	4

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.9.5 LA01	4.9.8.1.2	CTS Surveillance Requirement (SR) 4.9.8.1.2 requires a CHANNEL CALIBRATION to be performed on the RHR flow indicator. The ITS SRs do not include this SR. The CTS is being changed to move the CHANNEL CALIBRATION on the RHR flow indicator to the TRM. This change is designated as a less restrictive removal of detail change because an SR is being removed from the TSs into the TRM.	TRM	10 CFR 50.59	4
CTS 3/4.9.3 LA01	3.9.3	CTS 3.9.3 provides requirements associated with Decay Time. Specifically, CTS 4.9.3 requires a determination of verifying that the reactor has been subcritical for at least 72 hours by a verification of the date and time of subcriticality prior to movement of irradiated fuel in the reactor pressure vessel. With the reactor subcritical for less than 72 hours, the CTS 3.9.3 Action requires suspension of all operations involving movement of irradiated fuel in the reactor pressure vessel (RPV). ITS does not include a requirement for decay time. This changes the CTS by moving the explicit decay time requirements from the TSs to the TRM. This change is designated as a less restrictive removal of detail change because a requirement is being removed from the TSs.	TRM	10 CFR 50.59	1

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
Refer to DOC section in ML23151A453		**Chapter 4.0, Design Features**			
4.0 LA01	5.3.1	CTS 5.3.1 contains specific design features of the PTN fuel assemblies. ITS 4.2.1 does not contain all the specific design feature specified in the CTS, such as, the number of fuel rods in a fuel assembly, amount uranium dioxide in the core, and the active length of the fuel rods. This changes the CTS by removing specific design features of the fuel assemblies from the CTS and places these design features in the UFSAR. This change is designated as a less restrictive removal of detail change because fuel assembly design feature information is being removed from the TSs.	UFSAR	10 CFR 50.59	1
4.0 LA02	5.3.2	CTS 5.3.2 contains specific design features of the PTN control rod assemblies. ITS 4.2.2 does not contain all the specific design feature specified in the CTS, such as the length of the length in inches of the absorber material and what the control rod cladding material. This changes the CTS by removing specific design features of the control rod assemblies from the CTS and places these design features in the UFSAR. This change is designated as a less restrictive removal of detail change because control rod assembly design feature information is being removed from the Technical Specifications.	UFSAR	10 CFR 50.59	1

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
4.0 LA03	5.5.1.1.g 5.5.1.2	CTS 5.5.1 contains specific design features of the PTN fuel storage (spent and new). ITS 4.3.1 does not contain all the specific design feature specified in the CTS, such as the amount of ^{10}B in the Metamic neutron absorber inserts for the spent fuel and that the new fuel storage area is designed to store fuel in a safe subcritical array. This changes the CTS by removing specific design features of spent and new fuel storage from the CTS and places these design features in the UFSAR. This change is designated as a less restrictive removal of detail change because spent and new fuel storage design feature information is being removed from the Technical Specifications.	UFSAR	10 CFR 50.59	1
Refer to DOC section in ML23151A454		Chapter 5.0, Administrative Controls			
5.2 LA01	6.2.1.b	CTS 6.2.1.b uses the title "Chief Nuclear Officer." ITS 5.2.1.c uses the generic title "specified corporate officer." This changes the CTS by not listing the specific organizational titles in ITS Section 5.2. This change designated as a less restrictive removal of detail change because specific unit staffing requirements are being removed from the TSs.	QATR UFSAR	10 CFR 50.54(a)(3) 10 CFR 50.59	4
5.2 LA02	6.2.2.a Table 6.2-1 6.2.2.c 6.2.2.e	The following changes are being proposed in CTS Section 6.2.2. • CTS 6.2.2.a contains a Table with the minimum shift crew composition. ITS does not contain this Table but refers to the minimum shift crew requirements Table in 10 CFR 50.54. This	TRM	10 CFR 50.54 10 CFR 50.59	4

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
5.2 LA02 (continued)		changes the CTS by moving the CTS minimum shift crew composition table out of TSs. • CTS Table 6.2-1 includes a note providing an allowance for the shift crew composition to be one less than the minimum requirements of Table 6.2-1. ITS replaces CTS Table 6.2-1 staffing requirements with 10 CFR 50.54(m)(2)(i) and ITS 5.2.2.a and ITS 5.2.2.e. This changes the CTS by changing the CTS minimum shift crew composition reference from the table to 10 CFR 50.54 and the appropriate ITS specifications. • CTS 6.2.2.c contains requirements to have at least two licensed Operators in the control room during reactor startup, scheduled reactor shutdown, and during recovery from reactor trips and to have one licensed senior reactor operator in the control room during MODE 1, 2, 3, and 4. ITS 5.2.2 does not contain this requirement. This changes the CTS by moving this requirement out of TSs. • CTS 6.2.2.e requires that all CORE ALTERATIONS shall be observed and directly supervised by either a licensed senior reactor operator or licensed senior reactor operator limited to fuel handling who has no other concurrent responsibilities during this operation. ITS 5.2.2 does not contain this requirement. This changes the CTS by moving this requirement out of TSs.			

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
5.2 LA02 (continued)		This change is designated as a less restrictive removal of detail change because specific unit staffing requirements are being removed from the TSs.			
5.3 LA01	6.3.1.4	CTS 6.3.1.4 provides minimum education, experience, and training requirements for multi-discipline supervisors. ITS 5.3.1 does not include these requirements. The minimum education, experience, and training requirements for multi-discipline supervisors are moved to the Updated Final Safety Analysis Report (UFSAR). This changes the CTS by moving an administrative requirement to the UFSAR. This change is designated as a less restrictive removal of detail change because administrative requirements in TSs are being relocated to the UFSAR.	UFSAR	10 CFR 50.59	4
5.3 LA02	6.3.1.1	CTS 6.3.1.1 provides minimum qualifications for the Health Physics Supervisor. CTS 6.3.2 provides an exception to these minimum qualifications. ITS 5.3.1 does not include specific detail regarding exceptions to qualifications but states, "The staff not covered by Regulatory Guide 1.8 shall meet or exceed the minimum qualifications of Regulations, Regulatory Guides, or ANSI Standards acceptable to NRC staff." As such, the ITS provides guidance with respect to exceptions to qualifications. Therefore, the details associated with exceptions to Health Physics Supervisor qualifications are relocated to the UFSAR. This changes the CTS by moving an administrative requirement to the UFSAR. This change is designated as a less restrictive removal of detail change because administrative requirements in TSs are being relocated to the UFSAR.	UFSAR	10 CFR 50.59	4

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
5.4 LA01	6.8.1.c	CTS 6.8.1.c requires that written procedures for the PROCESS CONTROL PROGRAM (PCP) be established, implemented, and maintained. ITS 5.4.1 does not include these requirements. This changes the CTS by moving the requirements to the Updated Safety Analysis Report (UFSAR). This change is designated as a less restrictive removal of detail change because details for meeting TS and regulatory requirements are being removed from the TSs.	UFSAR	10 CFR 50.59 10 CFR 50.71(e)	4
5.4 LA02	6.8.1.e 6.8.1.g	CTS 6.8.1.e and g require written procedures be established, implemented, and maintained covering the Quality Control Program for effluent and environmental monitoring, respectively, "using the guidance in Regulatory Guide 1.21, Revision 1, 1974, and Regulatory Guide 4.1, Revision 1, April 1975." ITS 5.4.1.c does not include the Regulatory Guide references. This changes the CTS by moving the references to the regulatory guides to the UFSAR. This change is designated as a less restrictive removal of detail change because references for meeting TS requirements are being removed from the TSs.	UFSAR	10 CFR 50.59 10 CFR 50.71(e)	4
5.5 LA01	Table 4.8.2 footnote (6)	CTS Table 4.8.2 footnote (6) states, in part the float voltage of ≥ 2.13 volts is corrected for average electrolyte temperature. ITS 5.5.14 b.1 requires a program with actions to restore battery cells with float voltage < 2.13 V and ITS 5.5.14 b.2 requires a program with actions to determine whether the float voltage of the remaining battery cells is ≥ 2.13 V when the float voltage of a battery cells has been found to be < 2.13 V. This changes the CTS by moving information from the	ITS 5.5.14	Battery Monitoring and Maintenance Program	3

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
5.5 LA01 (continued)		specification to the Battery Monitoring and Maintenance Program implementing document. This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.			
5.5 LA02	6.8.4.a 6.8.4.e 6.8.4.k	CTS 6.8.4.a requires that the Primary Coolant Sources Outside Containment program include integrated leak test requirements for each system at 18-month intervals. ITS 5.5.2 contains a similar requirement but specifies the periodic Frequency as "In accordance with the Surveillance Frequency Control Program." CTS 6.8.4.e, "Diesel Fuel Oil Testing Program," requires that total particulate concentration of the fuel oil be ≤ 10 mg/liter when tested every 31 days. ITS 5.5.10 also requires that total particulate concentration of the fuel oil to be ≤ 10 mg/l but when tested in accordance with the Surveillance Frequency Control Program (SFCP). In addition, 6.8.4.k, "Control Room Envelope Habitability Program," requires measurement, at designated locations, of the CRE pressure relative to external areas adjacent to the CRE boundary during the pressurization mode of operation of the CREVS, operating at the flow rate required by SR 4.7.5.d, at a Frequency of 18 months and that the supply fans (trains A and B) will be tested on a staggered test basis (defined in TS definition 1.29 every 36 months). TS 5.5.15 similarly requires measurement, at designated locations, of the CRE pressure relative to all external areas adjacent to the CRE boundary during the pressurization mode of operation of the CREVS, operating at the flow rate required by the VFTP, at a Frequency in accordance with the SFCP and that the supply fans (trains A and B) will be tested at a Frequency	ITS 5.5.2 5.5.10 5.5.15	Surveillance Frequency Control Program	5

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
5.5 LA02 (continued)		in accordance with the SFCP. This changes the CTS by moving the specified periodic Frequency for the aforementioned tests to the SFCP. These changes are designated as a less restrictive removal of detail change because the test Frequencies are being removed from the TSs.			
5.5 LA03	4.8.2.1.c	CTS SR 4.8.2.1.c states, in part, that the battery cells, cell plates, and battery racks show no visual indication of physical damage or abnormal deterioration, and that the cell-to-cell and terminal connections are clean, tight, and coated with anticorrosion material. ITS 5.5.14, "Battery Monitoring and Maintenance Program," requires the program be maintained in accordance with IEEE Standard (Std) 450-2010. This changes the CTS by removing the information from the specification to the Battery Monitoring and Maintenance Program implementing document. This change is designated as a less restrictive removal of detail change because the battery visual inspection details are being removed from the TSs.	ITS 5.5.14	Battery Monitoring and Maintenance Program	3
5.5 LA04	4.7.5.c.2	CTS 4.7.5.c.2 requires that, within 31 days after removal of a carbon sample, the laboratory analysis results are shown to be within limit. ITS 5.5.8.c requires the same analysis to be performed; however, the detail of "within 31 days" after removal of a carbon sample is not included. This changes the CTS by moving these procedural details from the TSs to the TRM. This change is designated as less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.	TRM	10 CFR 50.59	3

Table R – Relocated Specifications and Removed Detail Changes

ITS/CTS No. and DOC No.	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
5.5 LA05	6.8.4.e	CTS 6.8.4.e requires a diesel fuel oil testing program to implement required testing of both new fuel oil and stored fuel oil. The program is required to include sampling and testing requirements, and acceptance criteria; all in accordance with applicable ASTM Standards. CTS 6.8.4.e includes the applicable ASTM standards. ITS 5.5.10 requires diesel fuel oil sampling and testing requirements, and acceptance criteria in accordance with the applicable ASTM standards. However, ITS 5.5.10 does not include specific ASTM standards, instead specific ASTM standards are included in ITS 3.8.3 Bases. This changes the CTS by moving these procedural details from the TSs to the ITS Bases. This change is designated as less restrictive removal of detail change because procedural details for meeting TS requirements are being removed from the TSs.	ITS Bases	Technical Specification Bases Control Program	3
5.6 LA01	6.9.1.6	CTS 6.9.1.6 provides the requirements for a Peaking Factor Limit Report. ITS 5.6 does not include this report. This changes the CTS by relocating the Peaking Factor Limit Report by attachment to the Core Operating Limits Report (COLR). This change is designated as a less restrictive removal of detail change because information relating to cycle-specific parameter limits in being removed from the TSs.	ITS 5.6.3	ITS 5.6.3	6

Table R – Relocated Specifications and Removed Detail Changes

Change Types (only applicable to LA DOCs)

Type 1 – Removing Details of System Design and System Description, Including Design Limits
Type 2 – Removing Descriptions of System Operation
Type 3 – Removing Procedural Details for Meeting TS Requirements or Reporting Requirements
Type 4 – Removal of LCO, SR, or other TS Requirements to the TRM, UFSAR, ODCM, QAP, CLRT Program, IST Program, ISI Program, or Surveillance Frequency Control Program
Type 5 – Removal of SR Frequencies to the Surveillance Frequency Control Program
Type 6 – Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

SUBJECT: TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4 – ISSUANCE OF AMENDMENT NOS. 297 AND 290 REGARDING CONVERSION TO IMPROVED STANDARD TECHNICAL SPECIFICATIONS (EPID L-2021-LLI-0002) DATED SEPTEMBER 27, 2023

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