

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 1.0 - USE AND APPLICATION

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|-------|--|--|-------------|-------------|
| L.1 | 1) Combines analog and bistable channel requirements in the CHANNEL FUNCTIONAL TEST definition resulting in an allowance for the bistable channel test signal to be injected "as close to the sensor as practicable" in lieu of "into the sensor," and 2) for the LOGIC SYSTEM FUNCTIONAL TEST, allows the signal to be injected "as close to the sensor as practicable" in lieu of "from the sensor." | 1.1 CHANNEL FUNCTIONAL TEST and LOGIC SYSTEM FUNCTIONAL TEST definitions | 1.6, 1.23 | 3 |
| L.2 | CTS 1.10 states that the DOSE EQUIVALENT I-131 is calculated using the thyroid dose conversion factors found in Table III of TID 14844, "Calculation of Distance Factors for Power and Test Reactor Sites." The ITS allows DOSE EQUIVALENT I-131 to be calculated using any one of three thyroid dose conversion factors; TID-14844 (1962), Table E-7 of Regulatory Guide 1.109, Rev. 1 (1977), or Supplement 1 to ICRP-30 (1980). Using thyroid dose conversion factors other than those given in TID-14844 results in lower doses and higher allowable activity but is justified by the discussion given in the Federal Register (FR page 23360 VI 56 No 98 May 21, 1991). | 1.1 DOSE EQUIVALENT I-131 definition | 1.10 | 3 |

NRC INSERT L.1 Chapter 2.0

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

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|-------|---|-------------|-------------|-------------|
| L.1 | The statement "If a Completion Time requires periodic performance on a "once per..." basis, the above Frequency extension applies to each performance after the initial performance," was added to allow the 1.25 times the interval specified in the Frequency concept to apply to periodic Required Actions. | SR 3.0.2 | 4.0.2 | 6 |
| L.2 | ITS SR 3.0.3 allows that, at the time it is discovered that the Surveillance has not been performed, the requirement to declare the equipment inoperable (LCO not met) may be delayed for up to 24 hours regardless as to whether the Completion Times of the Actions are 24 hours or less, as is currently allowed in CTS 4.0.3. The second and third paragraphs of ITS SR 3.0.3 are added to clearly state the actions to take if the Surveillance is not performed within the delay period or the Surveillance fails when performed. | SR 3.0.3 | 4.0.3 | 3 |
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TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|-----------------------------|--|---------------------------|----------------|-------------|
| 3.1.1, SHUTDOWN MARGIN | | | | |
| L.1 | Modifies the requirement to suspend CORE ALTERATIONS "except for control rod insertion and fuel assembly removal," to allow continuation of activities that have a potential to correct the problem and restore a margin of safety to an inadvertent or uncontrolled core criticality. | 3.1.1 ACTION E | 3.1.1 Action c | 4 |
| L.2 | Modifies the requirement to insert all insertable control rods in MODE 5 to only require those control rods in core cells containing one or more fuel assemblies to be fully inserted, since with all fuel assemblies removed from a core cell, inserting the associated control rod has a negligible impact on core reactivity. | 3.1.1 Required Action E.2 | 3.1.1 Action c | 4 |
| L.3 | Deletes CTS 4.1.1.b since the SDM limits adequately account for uncertainties and biases, and for fuel cycle changes. | N/A | 4.1.1.b | 3 |
| | | | | |
| 3.1.2, Reactivity Anomalies | | | | |
| L.1 | Revises the time allowed to restore the core reactivity difference to within limits (i.e., to "perform an analysis to determine and explain the cause of the reactivity difference") from 12 hours to 72 hours. | 3.1.2 ACTION A | 3.1.2 Action a | 6 |
| L.2 | Replaces the term "CORE ALTERATIONS" with "fuel movement within the reactor pressure vessel or control rod replacement," since the intent of this Surveillance is to verify the core reactivity after in-vessel operations which could have significantly altered the core reactivity. | SR 3.1.2.1 | 4.1.2.a | 3 |
| L.3 | Replaces the frequency "31 effective full power days" (approximately 734 MWD/T) (is proposed to be replaced with "1000 MWD/T." | SR 3.1.2.1 | 4.1.2.b | 3 |
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SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|--------------------------------|---|---------------------------------|--|-------------|
| 3.1.3, Control Rod OPERABILITY | | | | |
| L.1 | Revises the requirements for the local distribution of inoperable control rods by 1) adding a Note excluding its applicability above 10% power, 2) deleting actions for inoperable control rods whose position is in conformance with the analyzed rod position sequence (e.g., BPWS) constraints, even if the inoperable control rods are within two cells of each other, and 3) revising the Completion Time from 1 hour to 4 hours to correct the situation prior to commencing a required shutdown. | 3.1.3 ACTION D | 3.1.3.1 Actions a.1, b.1.a), and b.1.a)1) | 4, 6 |
| L.2 | Revises the Completion Time from 1 hour to 2 hours to insert the control rod. <i>disarm</i> | 3.1.3 Required Action A.2 | 3.1.3.1 Action a.1.b) | 6 |
| L.3 | Deletes requirement for restoration of a stuck control rod within 48 hours. Adds a new Required Action to verify stuck control rod separation criteria since the Specification now allows continued operation with a stuck control rod. | 3.1.3 Required Action A.1 | 3.1.3.1 Action a.3 | 4, 5 |
| L.4 | Extends the time allowed to complete the insertion of all inoperable non-stuck control rods to 3 hours for all cases. The time to disarm the control rods is extended to 4 hours - 1 hour beyond the time allowed to insert in recognition of the potential for excessive haste required to complete this task. | 3.1.3 ACTION C | 3.1.3.1 Actions b.1 and b.1.b), 3.1.3.6 Actions a.1 and a.1.b) | 6 |
| L.5 | Extends verification of control rods to be non-stuck from 7 days to 31 days for control rods that are not fully withdrawn. | SR 3.1.3.3 | 4.1.3.1.2.a | 3 |
| L.6 | Deletes daily notch test in the event power operation is continuing with an immovable control rod and the plant is operating at greater than the low power setpoint of the rod worth minimizer; only a single test once within 24 hours is required in ITS. | 3.1.3 Required Action A.3 | 4.1.3.1.2.b | 6 |
| L.7 | Extends the time to demonstrate SHUTDOWN MARGIN from 12 hours to 72 hours with a single control rod stuck in a withdrawn position. | 3.1.3 Required Action A.4 | 4.1.1.c | 6 |

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| L.8 | Deletes the requirement for additional scram time surveillance testing when three or more control rods exceed the maximum scram time. In addition, since the shutdown requirement ("Otherwise, be in at least HOT SHUTDOWN within 12 hours") could have only applied to CTS 3.1.3.2 Action 2 (since a control rod can always be declared inoperable), this part of the CTS 3.1.3.2 Action has also been deleted. | N/A | 3.1.3.2 Action 2 | 4, 5 |
| L.9 | Deletes the coupling requirements during refueling (OPERATIONAL CONDITION 5) since only one control rod can be withdrawn from core cells containing fuel assemblies. However, these requirements are retained for the proposed SDM testing in MODE 5 (ITS 3.10.7). | N/A | LCO 3.1.3.6, 3.1.3.6 Action b (including footnote *) | 2 |
| L.10 | Allows 3 hours to re-establish coupling for an uncoupled control rod before the control rod must be fully inserted and disarmed. Also, because of the limited time allowed to recouple, removes the restriction on the number of attempts. | 3.1.3 Required Actions C.1 and C.2 | 3.1.3.6 Action a.1.b) | 4, 6 |
| L.11 | Deletes the requirements of CTS 3.1.3.6 Action a.1.a)2) since they are not necessary for ensuring recoupling of the control rod. | N/A | 3.1.3.6 Action a.1.a)2) | 4 |
| L.12 | Deletes the requirements to verify control rod coupling by observing any indicated response of the nuclear instrumentation during withdrawal of a control rod, since a response to control rod motion on nuclear instrumentation is indicative that a control rod is following its drive, but gives no indication as to whether or not a control rod is coupled. | N/A | 3.1.3.6 Action a.1.a)1), 4.1.3.6 | 3, 4 |
| L.13 | CTS 3.1.3.7 Action a.1 provides methods for determining the position of a control rod whose position indicator is inoperable. These methods are moved to the Bases. In addition , the 12 hour requirement to verify no rod drift alarm is being deleted. The ITS will require the rod position to be determined every 24 hours. | N/A | 3.1.3.7 Action a.1.(c) | 4 |

as described in ITS 3.1.3 Doc LA.2

When the control rod is withdrawn to the full out position, the control rod coupling verifications prior to startup, and each time a control rod is fully inserted

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| L.14 | Deletes the Surveillances requiring that the control rod position indication system be determined OPERABLE during the performance of the control rod movement tests, since the requirements for the control rod position indication system are adequately addressed by the requirements of ITS 3.1.3 and associated SR 3.1.3.2, SR 3.1.3.3, and SR 3.1.3.5. | 3.1.3 | 4.1.3.7.b, 4.1.3.7.c, 4.1.3.7.d | 3 |
| 3.1.4, Control Rod Scram Times | | | | |
| L.1 | Changes requirement for control rod scram time testing of all control rods prior to exceeding 40% RTP following CORE ALTERATIONS to only requiring testing of affected control rods following any fuel movement within the affected core cell. | SR 3.1.4.4 | 4.1.3.2.a | 3 |
| | | | | |
| 3.1.5, Control Rod Scram Accumulators | | | | |
| L.1 | Provides the option to declare a control rod with an inoperable accumulator "slow" when reactor pressure is sufficient is proposed in lieu of declaring the control rod inoperable. The option for declaring the control rod with an inoperable accumulator "slow" is restricted to control rods not previously known to be slow. Additionally, with more than one accumulator inoperable, in lieu of the CTS requirement to declare the associated control rod inoperable immediately and to insert and disarm the associated control rod drive or shutdown the unit, actions will allow the affected control rods to be declared slow or inoperable, as applicable, in 1 hour. The 1 hour will only allowed provided the control rod drive header pressure alone is sufficient to insert control rods if a scram is required. | 3.1.5 Required Actions A.1, B.2.1, B.2.2, C.1, and C.2 | 3.1.3.5 Action a.1.a)2) | 4, 6 |
| L.2 | Revises the requirement to allow 20 minutes to ensure control rod accumulator charging water pressure is adequate to support maintaining the remaining accumulators OPERABLE. | 3.1.5 Required Action B.1 | 3.1.3.5 Action a.2.a) | 4, 6 |
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| 3.1.6, Rod Pattern Control | | | | |

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|-------|---------|-------------|-------------|-------------|
| NONE | NONE | NONE | NONE | NONE |
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SECTION 3.1 - REACTIVITY CONTROL SYSTEMS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|---|---|---------------------------|-------------------------|-------------|
| 3.1.7, Standby Liquid Control System | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 to 24 months for the following Surveillances: Verification of flow through one SLC subsystem from pump into the reactor vessel; and verification that all heat traced piping between the storage tank and the storage tank outlet valves is unblocked. | SR 3.1.7.8, SR 3.1.7.9 | 4.1.5.c.1, 4.1.5.c.4 | 10 |
| L.1 | Deletes the requirement that the SLC System be OPERABLE in MODE 5 with any control rod withdrawn, since only a single control rod can be withdrawn and adequate SHUTDOWN MARGIN prevents criticality under these conditions. | N/A | LCO 3.1.5 | 2 |
| L.2 | Deletes the requirement to test both SLC pumps every 31 days, since testing the SLC pumps in accordance with the Inservice Testing Program provides adequate assurance that the pumps will perform their required function. | N/A | 4.1.5.b.1 | 3 |
| L.3 | Deletes the requirement that the SLC flow verification, SLC pump flow and discharge pressure verification, and the heat traced piping unblocked Surveillances be performed "during shutdown." | N/A | 4.1.5.c | 3 |
| L.4 | Deletes the requirement to demonstrate the heaters OPERABLE by verifying a temperature rise in the storage tank; the daily verification of the solution temperature provides an adequate check on the capability of the storage tank heaters to maintain solution temperature. | N/A | 4.1.5.c.5 | 3 |
| | | | | |
| 3.1.8, SDV Vent and Drain Valves | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 to 24 months for the following Surveillance: Verification that the vent and drain valves close in ≤ 30 seconds after receipt of an actual or simulated scram signal and open when the actual or simulated scram signal is reset. | SR 3.1.8.3 | 4.1.3.1.4 | 10 |
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SECTION 3.1 - REACTIVITY CONTROL SYSTEMS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|--|--|--|-------------|-------------|
| Current Specification 3/4.1.3.8, Control Rod Drive Housing Support | | | | |
| L.1 | Deletes the requirement for the CRD housing support to be in place, since it is included in the OPERABILITY requirements for control rods and is controlled by plant configuration management. | 1.0 Operable-Operability definition, 3.1.3 | 3/4.1.3.8 | 1 |
| | | | | |
| Current Specification 3/4.1.6, Economic Generation Control System | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

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

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|---|--|----------------|----------------|-------------|
| 3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE | | | | |
| L.1 | The requirement to verify APLHGR within limits within 12 hours after completion of a THERMAL POWER increase of at least 15% of RATED THERMAL POWER is relaxed to once within 12 hours after greater than or equal to 25% RTP. the <u>addition</u> allows the Applicability to be entered (i.e., $\geq 25\%$ RTP) prior to performing the Surveillance. <i>This change</i> | SR 3.2.1.1 | 4.2.1.b | 3 |
| L.2 | Deletes requirement to verify APLHGRs be within the limits initially and every 12 hours when operating at a LIMITING CONTROL ROD PATTERN, since it is superfluous as it would not be evident that a LIMITING CONTROL ROD PATTERN has been achieved until the Surveillance is performed. | N/A | 4.2.1.c | 3 |
| | | | | |
| 3.2.2, MINIMUM CRITICAL POWER RATIO | | | | |
| L.1 | Extends the Completion Time to restore MCPR to within limits, when operating in a condition not specified in the COLR, to 2 hours, to allow appropriate actions to be evaluated by the operator and completed in a timely manner. | 3.2.2 ACTION A | 3.2.3 Action b | 6 |
| L.2 | The requirement to verify MCPR within limits within 12 hours after completion of a THERMAL POWER increase of at least 15% of RATED THERMAL POWER is relaxed to once within 12 hours after greater than or equal to 25% RTP. the <u>addition</u> allows the Applicability to be entered (i.e., $\geq 25\%$ RTP) prior to performing the Surveillance. <i>This change</i> | SR 3.2.2.1 | 4.2.3.1.b | 3 |
| L.3 | Deletes requirement to verify MCPR be within the limits initially and every 12 hours when operating at a LIMITING CONTROL ROD PATTERN, since it is superfluous as it would not be evident that a LIMITING CONTROL ROD PATTERN has been achieved until the Surveillance is performed. | N/A | 4.2.3.1.c | 3 |
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**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|---|---|-------------|-------------|-------------|
| 3.2.3, LINEAR HEAT GENERATION RATE | | | | |
| L.1 | The requirement to verify LHGR within limits within 12 hours after completion of a THERMAL POWER increase of at least 15% of RATED THERMAL POWER is relaxed to once within 12 hours after greater than or equal to 25% RTP. addition allows the Applicability to be entered (i.e., $\geq 25\%$ RTP) prior to performing the Surveillance. <i>This change</i> | SR 3.2.3.1 | 4.2.4.b | 3 |
| L.2 | Deletes requirement to verify LHGRs be within the limits initially and every 12 hours when operating at a LIMITING CONTROL ROD PATTERN, since it is superfluous as it would not be evident that a LIMITING CONTROL ROD PATTERN has been achieved until the Surveillance is performed. | N/A | 4.2.4.c | 3 |
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SECTION 3.3 - INSTRUMENTATION**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|-------------------------------------|---|---|--|-------------|
| 3.3.1.1, RPS Instrumentation | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the RPS LOGIC SYSTEM FUNCTIONAL TEST, the verification of the bypass setpoints for the Turbine Stop Valve—Closure and Turbine Control Valve Fast Closure, Trip Oil Pressure—Low Functions, and the RPS RESPONSE TIME TEST. | SR 3.3.1.1.15, SR 3.3.1.1.16, SR 3.3.1.1.17 | 4.3.1.2, Table 4.3.1.1-1 Note (i), 4.3.1.3 | 10 |
| LD.2 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL FUNCTIONAL TEST for the Reactor Mode Switch—Shutdown Position Function. | SR 3.3.1.1.12 | 4.3.1.1 for Table 4.3.1.1-1 Functional Unit 11 | 10 |
| LE.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION. | SR 3.3.1.1.13 for Functions 1.a, 4, 5, 6, 7, 8, and 9, SR 3.3.1.1.14 for Function 2.b | 4.3.1.1 for Table 4.3.1.1-1 Functional Units 1.a, 2.b, 4, 5, 7, 8, 9, and 10 | 10 |
| LF.1 | Revises the Current Technical Specifications (CTS) Allowable Values to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy"). | Table 3.3.1.1- 1 | Table 2.2.1-1 | 1 |
| L.1 | Deletes the IRM Neutron Flux—High, IRM Inoperative, Reactor Mode Switch Shutdown Position, and Manual Scram requirements for MODES 3 and 4 since during normal operation in MODES 3 and 4, all control rods are fully inserted and the Reactor Mode Switch Shutdown position control rod withdrawal block (ITS 3.3.2.1) does not allow any control rod to be withdrawn. | N/A | Tables 3.3.1-1 and 4.3.1.1-1 Functional Units 1.a, 1.b, 11, and 12, Table 3.3.1- 1 Actions 2, 7, and 8 | 1 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

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| L.2 | CTS requirements for IRM Neutron Flux—High, IRM Inoperative, Reactor Mode Switch Shutdown Position, and Manual Scram to be OPERABLE in MODE 5 are replaced with ITS requirements for these Functions to be OPERABLE in MODE 5 when a control rod is withdrawn from a core cell containing one or more fuel assemblies. Conforming ITS ACTION H requirements are included for consistency with the proposed ITS Applicability. Furthermore, CTS Action 9 also to lock the reactor mode switch in Shutdown are deleted, since once the control rods are inserted, the RPS Functions are no longer required to be OPERABLE, thus there is no need to place the reactor mode switch in Shutdown. | Table 3.3.1.1-1 Note (a), 3.3.1.1 ACTION H | Tables 3.3.1-1 and 4.3.1.1-1 Functional Units 1.a, 1.b, 11, and 12, Table 3.3.1-1 Actions 3 and 9 | 2 |
| L.3 | Deletes the APRM Neutron Flux—High, Setdown and APRM Inoperative requirements for MODE 3 since during normal operation in MODE 3, all control rods are fully inserted and the Reactor Mode Switch Shutdown position control rod withdrawal block (ITS 3.3.2.1) does not allow any control rod to be withdrawn. | N/A | Tables 3.3.1-1 and 4.3.1.1-1 Functional Units 2.a and 2.d, Table 3.3.1-1 Action 2 | 1 |
| L.4 | Deletes the APRM Neutron Flux — High, Setdown and APRM Inoperative requirements for MODE 5, since APRMs are not necessary for safe operation of the plant while operating in MODE 5 with the mode switch in "Refuel." | N/A | Tables 3.3.1-1 and 4.3.1.1-1 Functional Units 2.a and 2.d | 1 |
| L.5 | Deletes the requirement to perform the CHANNEL FUNCTIONAL TEST of the APRM Flow Biased Simulated Thermal Power — Upscale Function and APRM Fixed Neutron Flux — High Function "Within 4 hours prior to startup, if not performed within the previous 7 days," since the normal 92 day periodic Surveillance Frequency provides adequate assurance that the APRM Functions are Operable. | N/A | Table 4.3.1.1-1 including footnote (c) | 3 |
| L.6 | The CTS Scram Discharge Volume Water Level trip Function Applicability is modified from requiring the Function to be OPERABLE in MODE 5 with any control rod withdrawn to only requiring the Function to be OPERABLE in MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies. Conforming ITS ACTION H requirements are included for consistency with the proposed ITS Applicability. | Table 3.3.1.1-1 Functions 7.a and 7.b, including Note (a), 3.3.1.1 ACTION H | Table 3.3.1-1 Functional Unit 8, including Note (h), Table 3.3.1-1 Action 3 | 2 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

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| L.7 | Deletes the requirement to initiate a reduction in THERMAL POWER within 15 minutes, since immediate power reduction may not always be the conservative method to assure safety. | N/A | Table 3.3.1-1 Action 6 | 5 |
| L.8 | Extends the time to reach < 25% RTP from 2 hours to 4 hours. | 3.3.1.1 Required Action E.1 | Table 3.3.1-1 Action 6 | 6 |
| L.9 | ITS provides an exception to Operability requirements for performing specified APRM heat balance calibration until 12 hours after THERMAL POWER \geq 25% RTP. | SR 3.3.1.1.2 Note | Table 4.3.1.1-1 footnote (d) | 3 |
| L.10 | Deletes the requirement to post a notification on the reactor control panel if any required APRM must be adjusted to be within 2% of RATED THERMAL POWER. | N/A | Table 4.3.1.1-1 footnote (d) | 5 |
| L.11 | Deletes the response time for the RPS APRM Flow Biased Simulated Thermal Power - Upscale Function, since it is not credited in any safety analysis. | N/A | 4.3.1.3 for Table 3.3.1-1 Functional Unit 2.b | 3 |
| 3.3.1.2, SRM Instrumentation | | | | |
| LE.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the SRM CHANNEL CALIBRATION. | SR 3.3.1.2.7 | 4.3.7.6.a.2 | 10 |
| L.1 | CTS only specifies an action for one required SRM inoperable during MODE 2; therefore, a plant shutdown is required (per CTS 3.0.3) if two or more required SRMs become inoperable. The words "or more" are added (ITS 3.3.1.2 Condition A) to allow the action to apply to two or three inoperable SRMs (i.e., allow 4 hours to restore the inoperable SRMs). Additionally, with no OPERABLE SRMs, the ability to monitor positive reactivity changes is significantly restricted, thus a new Action is added in the ITS to ensure that no further control rod withdrawal is allowed. | 3.3.1.2 Condition A, 3.3.1.2 ACTION B | N/A | 5 |
| L.2 | Deletes the CTS requirement to "lock" the mode switch in Shutdown. | N/A | 3.3.7.6 Action b | 8 |

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SECTION 3.3 - INSTRUMENTATION**

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| L.3 | ITS provides an exception to Operability requirements for CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION requirements for the SRMs until 12 hours after the IRMs are on Range 2 or below. | SR 3.3.1.2.6 Note, SR 3.3.1.2.7 Note | 4.3.7.6.a.2, 4.3.7.6.b | 3 |
| L.4 | Deletes the "prior to" frequency from CTS Surveillances involving the reactor mode switch, withdrawing control rods, and performing CORE ALTERATIONS. These additional Surveillance Frequencies are redundant to CTS 3.0.1 and CTS 4.0.4. | SR 3.3.1.2.6, SR 3.3.1.2.5, SR 3.3.1.2.4 | 4.3.7.6.b.1, 4.9.2.b.1, 4.9.2.c.1 | 3 |
| L.5 | Modifies the requirement to fully insert all insertable control rods in MODE 5 if one or more required SRMs are inoperable to only require those control rods in core cell containing one or more fuel assemblies, since with all fuel assemblies removed from a core cell, inserting the associated control rod has a negligible impact on core reactivity. | 3.3.1.2 Required Action E.2 | 3.9.2 Action | 4 |
| L.6 | Reduces the number of SRMs required to be OPERABLE when in MODES 3 and 4 from three to two, consistent with the CTS Action. | Table 3.3.1.2- 1 | LCO 3.3.7.6, 3.3.7.6 Action b | 1 |
| L.7 | Revises the CTS Action to immediately "...insert all insertable control rods" to "initiate action to insert all insertable control rods...." During MODE 5, it may not be possible to immediately insert all insertable control rods; therefore the ITS provides a Required Action to immediately initiate action and continue attempts to insert all insertable control rods. | 3.3.1.2 Required Action E.2 | 3.9.2 Action | 4 |
| L.8 | Adds a Note that eliminates requirements for SRMs outside the fueled region to be Operable in MODE 5, during a spiral offload or reload, since monitors in these positions are not capable of monitoring normal changes in neutron flux. Similarly, SRM count rate requirements are deleted. | Table 3.3.1.2- 1 Note (b) | 4.9.2.a.3 | 1 |
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| 3.3.2.1, Control Rod Block Instrumentation | | | | |

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
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|-------------------------|--|--|-----------------------------|------|
| LF.1 | Revises the Current Technical Specifications (CTS) Allowable Values to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy"). | Table 3.3.2.1-1 | Table 3.3.6-2 | 1 |
| L.1 | Deletes the requirement to perform the CHANNEL FUNCTIONAL TEST of the RBM "Within 24 hours prior to startup, if not performed within the previous 7 days," since the normal 92 day periodic Surveillance Frequency provides adequate assurance that the RBM Functions are Operable. | N/A | Table 4.3.6-1 Note (b) | 3 |
| L.2 <i>12 months</i> | CTS does not allow a reactor startup with the RWM inoperable. The ITS will allow one reactor startup to commence once per calendar year with the RWM inoperable. In addition, the ITS will also allow a startup to continue if the RWM becomes inoperable after the first rod is pulled (at least 12 rods must be withdrawn prior to allowing the startup to continue if the RWM becomes inoperable and not crediting this as the one startup with the RWM inoperable). | 3.3.2.1 ACTION C | 3.3.6 Actions a and c | 5 |
| L.3 | Deletes the restriction that prohibits continued operation if more than 3 rods in any RWM group are inoperable when the RWM is required to be OPERABLE, since CTS 3.1.3.1 Actions a.1.a) and b.1.a.1) (ITS 3.1.3 ACTION D) provide necessary constraints on multiple rod inoperability relying on separation of the rods by at least two control cells in all directions. | 3.1.3 ACTION D | 3.1.4.1 Action b.2 | 5 |
| L.4 | CTS requirements for RWM Channel Functional Testing are modified. ITS SRs extend the CHANNEL FUNCTIONAL TEST to 92 days. ITS Notes extend the time, for up to 1 hour, to perform the RWM CHANNEL FUNCTIONAL TEST after any control rod is withdrawn at $\leq 10\%$ RTP in MODE 2 and after THERMAL POWER is $\leq 10\%$ RTP in MODE 1. | SR 3.3.2.1.2 including Note, SR 3.3.2.1.3 including Note | 4.1.4.1.a, b, c | 3 |
| L.5 | Deletes CTS Action that requires verification that the reactor is not operating on a LIMITING CONTROL ROD PATTERN when one RBM channel is inoperable, and deletes the Surveillance Requirement that requires a CHANNEL FUNCTIONAL TEST prior to control rod withdrawal when the reactor is operating on a LIMITING CONTROL ROD PATTERN. | N/A | 3.1.4.3 Action a, 4.1.4.3.b | 3, 4 |
| | | | | |

Rev D

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
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| 3.3.2.2, Feedwater System and Main Turbine High Water Level Trip Instrumentation | | | | |
|---|--|---|--|---------|
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST. | SR 3.3.2.2.4 | 4.3.8.2 | 10 |
| LE.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION. | SR 3.3.2.2.3 | 4.3.8.1 for Table 4.3.8.1-1 Trip Function a | 10 |
| LF.1 | Revises the Current Technical Specifications (CTS) Allowable Value to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy"). | SR 3.3.2.2.3 | Table 3.3.8-2 | 1 |
| L.1 | Modifies the Applicability for the Feedwater System and Main Turbine Water Level Trip Instrumentation from MODE 1 to when THERMAL POWER is \geq 25% RTP, and the current shutdown action to only require power to be reduced to $<$ 25% RTP. In addition, the time to achieve this power level has been reduced from 6 hours to 4 hours. | 3.3.2.2 Applicability, 3.3.2.2 ACTION C | 3.3.8 Applicability, 3.3.8 Action c | 2, 5, 6 |
| L.2 | CTS requires reduction in Thermal Power if the Feedwater System Main Turbine High Water Level Trip Instrumentation is not restored to Operable status. ITS adds a Required Action to allow removal of the associated feedwater pump(s) from service in lieu of reducing Thermal Power. This Required Action will only be used if the instrumentation is inoperable solely due to an inoperable feedwater pump breaker or feedwater turbine stop valve. | 3.3.2.2 Required Action C.1 | N/A | 5 |
| | | | | |
| 3.3.3.1, Post Accident Monitoring Instrumentation | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL FUNCTIONAL TEST portion of the CHANNEL CALIBRATION. | SR 3.3.3.1.2 | 4.3.7.5 for Table 4.3.7.5-1 Instruments 1-4, 6, and 10 | 10 |

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
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| | | | | |
|--|--|--|--|------|
| LE.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION. | SR 3.3.3.1.2 | 4.3.7.5 for Table 4.3.7.5-1 Instruments 1-4, 6, and 10 | 10 |
| L.1 | Adds a Note that LCO 3.0.4 is not applicable to the ITS 3.3.3.1 ACTIONS. | 3.3.3.1 ACTIONS Note 1 | N/A | 7 |
| L.2 | Adds a Note to allow a channel to be inoperable for up to 6 hours solely for performance of required Surveillances provided the other channel in the associated Function is OPERABLE. | 3.3.3.1 Surveillance Requirements Note 2 | N/A | 6 |
| L.3 | In the event the number of OPERABLE channels is less than the Required Number of Channels requirement, the CTS requires the inoperable channels to be restored within 7 days. In the event the number of OPERABLE channels is less than the Minimum Channels OPERABLE requirement, the CTS requires the inoperable channels to be restored within 48 hours. The ITS extends these Completion Times to 30 days and 7 days, respectively. | 3.3.3.1 ACTIONS A and C | Table 3.3.7.5-1 Actions 80a and 80b | 6 |
| L.4 | The CTS Actions for one channel inoperable in one or more Functions for more than the allowed outage time is revised from requiring a shutdown to requiring a Special Report. | 3.3.3.1 ACTION B | Table 3.3.7.5-1 Actions 80a and 82a | 5 |
| L.5 | With one or two primary containment gross gamma radiation monitors inoperable, the CTS requires initiation of the alternate method of monitoring within 72 hours and restoration of both channels to OPERABLE status within 7 days. With one monitor inoperable, the ITS provides 30 days for the restoration of the monitor prior to initiating the action in accordance with Specification 5.6.6 <u>alternate method of monitoring</u> and with two monitors inoperable, provides 7 days for restoration of one monitor prior to initiating <u>the alternate method of monitoring</u> . | 3.3.3.1 ACTIONS A, B, C, D, and F | Table 3.3.7.5-1 Action 81 | 5, 6 |
| | <u>action in accordance with Specification 5.6.6</u> | | | |
| 3.3.3.2, Remote Shutdown Monitoring System | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
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| | | | | |
|---|--|--|---|----|
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL FUNCTIONAL TEST portion of the CHANNEL CALIBRATION. | SR 3.3.3.2.2 | 4.3.7.4 for Table 4.3.7.4-1 | 10 |
| LE.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION. | SR 3.3.3.2.2 | 4.3.7.4 for Table 4.3.7.4-1 | 10 |
| L.1 | Extends from 7 days to 30 days the allowed outage time for inoperable Remote Shutdown Monitoring System instrumentation. | 3.3.3.2 ACTION A | 3.3.7.4 Action a | 6 |
| L.2 | Adds a Note to allow a channel to be inoperable for up to 6 hours solely for performance of required Surveillances. | 3.3.3.2 Surveillance Requirements Note | N/A | 6 |
| L.3 | CTS requires a Channel Check to be performed for deenergized instruments during normal operation. No specific acceptance criteria would apply to a Channel Check performed on instrumentation that is not showing proper indication. The ITS excludes the Channel Check requirement for deenergized channels. | SR 3.3.3.2.1 | 4.3.7.4 for Table 4.3.7.4-1 Instruments 1, 2, 3, 4, and 7 | 3 |
| | | | | |
| 3.3.4.1, EOC-RPT Instrumentation | | | | |
| LB.1 | Extends from 12 hours to 72 hours the allowed out of service time when one or more channels are inoperable but EOC-RPT trip capability is maintained. | 3.3.4.1 ACTION A | 3.3.4.2 Actions b and c.1 | 6 |
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST, verification that the Turbine Stop Valve—Closure and Turbine Control Valve—Fast Closure Functions are not bypassed when THERMAL POWER is \geq 25% RTP, and EOC-RPT RESPONSE TIME TEST (except the breaker arc suppression time). | SR 3.3.4.1.3, SR 3.3.4.1.4, SR 3.3.4.1.5 | 4.3.4.2.2, Table 4.3.4.2.1-1 footnote (a), 4.3.4.2.3 | 10 |
| LE.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION. | SR 3.3.4.1.2 | 4.3.4.2.1 for Table 4.3.4.2.1-1 Trip Functions 1 and 2 | 10 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
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| | | | | |
|------|---|--|----------------------------|------|
| LF.1 | Revises the Current Technical Specifications (CTS) Allowable Values to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy"). | SR 3.3.4.1.2 | Table 3.3.4.2-2 | 1 |
| L.1 | The time provided to restore channels to Operable status if both Trip Systems are affected, or the time to apply the MCPR EOC-RPT inoperable limit, has been extended from 1 hour to 2 hours, consistent with the time provided to restore a MCPR limit. | 3.3.4.1 ACTION B | 3.3.4.2 Action e | 6 |
| L.2 | CTS require a reduction in Thermal Power to < 25% RTP if the EOC-RPT instrumentation is not restored or if the MCPR penalty is not applied. ITS will allow removal of the associated recirculation pump fast speed breaker from service in lieu of reducing Thermal Power to < 25% RTP. In addition, conforming changes are made to the CTS Applicability to require the EOC-RPT instrumentation to be Operable when Thermal Power is \geq 25% RTP with any recirculation pump in fast speed. | 3.3.4.1 Applicability, 3.3.4.1 Required Action C.1 | N/A | 5, 2 |
| L.3 | When two turbine stop valve channels or two turbine control valve channels in the same Trip System are inoperable, in place of the CTS requirement to restore the inoperable channels, the ITS provides an option to place inoperable channels in the tripped condition, conservatively compensating for the inoperable status, restores the single failure capability and provides the required initiation capability of the instrumentation. | 3.3.4.1 Required Action A.1 | 3.3.4.2 Action c.2 | 5 |
| L.4 | CTS requires that when one Trip System is inoperable, 72 hours are provided to restore the Trip System. CTS also requires that when both Trip Systems are inoperable, 1 hour is provided to restore one Trip System. The ITS addresses trip Function capability, not Trip System capability, providing a 2 hour Completion Time to restore trip capability when one or more Functions have lost EOC-RPT trip capability. A trip Function is maintained when sufficient channels are Operable or in trip, such that the EOC-RPT System will generate a trip signal from the given Function on a valid signal and both recirculation pumps can be tripped. This requires two channels of the Function, in the same trip system, to each be Operable or in trip. | 3.3.4.1 ACTION B | 3.3.4.2 Actions d and e | 5, 6 |
| | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
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| 3.3.4.2, ATWS-RPT Instrumentation | | | | |
|-----------------------------------|--|---------------------|---|----|
| LB.1 | Extends from 24 hours to 14 days the allowed out of service time when one or more channels are inoperable provided ATWS-RPT trip capability in both Functions is maintained. | 3.3.4.1 ACTION A | 3.3.4.2 Actions b and c.1 | 6 |
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST. | SR 3.3.4.2.4 | 4.3.4.1.2 | 10 |
| LE.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION. | SR 3.3.4.2.3 | 4.3.4.1.1 for Table 4.3.4.1-1 Trip Functions 1 and 2 | 10 |
| LF.1 | Revises the Current Technical Specifications (CTS) Allowable Values to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy"). | SR 3.3.4.2.3 | Table 3.3.4.1-2 | 1 |
| L.1 | When one reactor vessel water level channel and one reactor vessel pressure channel in the same Trip System are inoperable or when two reactor vessel water level channels or two reactor vessel pressure channels in the same Trip System are inoperable, in place of the CTS requirement to restore the inoperable channels, the ITS addresses only channels and will require the inoperable channels be restored to operable status. ITS also provides an option to place inoperable channels in the tripped condition. | 3.3.4.2 ACTION A | 3.3.4.1 Actions c.1 and c.2 | 5 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
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| | | | | |
|--------------------------------------|--|---|---|-------------|
| L.2 | CTS requires that when one Trip System is inoperable, 72 hours are provided to restore the Trip System. CTS also requires that when both Trip Systems are inoperable, 1 hour is provided to restore one Trip System. The ITS addresses trip Function capability, not Trip System capability, providing a 72 hour Completion Time to restore trip capability when one Function has lost ATWS-RPT trip capability and a 1 hour Completion Time when both Functions have lost ATWS-RPT trip capability. A trip Function is maintained when sufficient channels are Operable or in trip, such that the ATWS- RPT System will generate a trip signal from the given Function on a valid signal and both recirculation pumps can be tripped. This requires two channels of the Function, in the same trip system, to each be Operable or in trip. ITS extends the time for repair to 14 days when either the pressure or level functions are inoperable in one trip system provided the other trip system retains trip capability. | 3.3.4.2 ACTIONS B and C | 3.3.4.1 Actions d and e | 5, 6 |
| L.3 | CTS require the unit to be in Mode 2 if the ATWS-RPT Instrumentation is not restored. ITS will allow removal of the associated recirculation pump from service in lieu of being in MODE 2 within 6 hours. | 3.3.4.2 Required Action D.1 | N/A | 5 |
| | | | | |
| 3.3.5.1, ECCS Instrumentation | | | | |
| LB.1 | The CTS allowance to delay entering the associated Action statement when performing required Surveillances is clarified to allow the CTS Functions to be inoperable and delay entering the associated Actions for 6 hours, regardless of the remaining ECCS initiation capability of the Function. For these three Functions, loss of one channel results in a loss of HPCS initiation capability. | 3.3.5.1 Surveillance Requirements Note 2 | Table 3.3.3-1 footnote (a) for Trip Functions C.1.c, C.1.f, C.1.g, and C.1.h | 6 |
| LB.2 | CTS Table 3.3.3-1 Action 38.b for LPCS and LPCI Injection Valve Reactor Pressure—Low (Permissive) Functions requires the two inoperable channels to be restored to OPERABLE status within one hour or to declare the associated ECCS systems inoperable. The allowed out-of-service time has been extended to 24 hours, provided the other Division of low pressure ECCS is Operable. | 3.3.5.1 ACTION D | Table 3.3.3-1 Action 38.b for Trip Functions A.1.e and B.1.g | 6 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | | |
|-------|--|--|--|--------------------|
| LD.1. | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST, and the CHANNEL FUNCTIONAL TEST for the Manual Initiation Functions, and the ECCS RESPONSE TIME test. | SR 3.3.5.1.5, SR 3.3.5.1.6 | 4.3.3.2, 4.3.3.1 for Table 4.3.3.1-1 Trip Functions A.1.h, A.2.h, B.1.f, B.2.f, and C.1.h, 4.3.3.3 | 10 |
| LE.1 | Relaxation of Surveillance Frequency from 92 days and 18 months to 24 months for performing the CHANNEL CALIBRATION. | SR 3.3.5.1.4 | 4.3.3.1 for Table 4.3.3.1-1 Trip Functions A.1.a, A.1.b, A.1.d, A.1.e, A.1.f, B.1.a, B.1.b, B.1.c, B.1.d, B.1.g, A.2.a, A.2.b, A.2.c, A.2.d, A.2.e, A.2.f, A.2.h, B.2.a, B.2.b, B.2.c, B.2.d, B.2.e, B.2.g, C.1.a, C.1.b, C.1.c, and C.1.f | 10 <i>SPACE</i> |
| LF.1 | Revises the Current Technical Specifications (CTS) Allowable Values to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy"). | Table 3.3.5.1-1 | Table 3.3.3-2 | 1 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | | |
|-----|---|-----------------------------------|--|------|
| L.1 | CTS requires restoration of an ADS Trip System to Operable status when it is inoperable. CTS requires an inoperable ADS Reactor Vessel Water Level - Low, Level 3 (Permissive) channel to be restored to Operable status. ITS provides an option to place all inoperable channels in the tripped condition, conservatively compensating for the inoperable status, restoring the single failure capability, and providing the required initiation capability of the instrumentation. | 3.3.5.1 Required Action E.2 | 3.3.3 Action c, Table 3.3.3-1 Action 32 | 5 |
| L.2 | Increases from 122 psig to 150 psig the pressure at which ADS is required to be OPERABLE to provide consistency of the OPERABILITY requirements for all ECCS and RCIC equipment. | 3.3.5.1 Applicability | Table 3.3.3-1 footnote (#), CTS Table 4.3.3.1-1 footnote #, and CTS 3.3.3 Action c | 2 |
| L.3 | <p>CTS Table 3.3.3-1 Action 30.b requires the associated ECCS to be declared inoperable immediately when more than one channel of a Trip Function is inoperable. CTS Table 3.3.3-1 Action 35.b requires the HPCS to be declared inoperable when channels in both trip systems are inoperable. These Actions apply to LPCS, LPCI, and ADS Reactor Vessel Water Level - Low, Low, Low, Level 1, HPCS Reactor Vessel Water Level - Low, Low, Level 2, LPCS, LPCI, ADS, and HPCS Drywell Pressure - High .</p> <p>The ITS will allow 24 hours, 96 hours, or 8 days, as applicable to place inoperable channels in trip when two channels of a Function are inoperable, prior to declaring the associated ECCS inoperable, provided ECCS initiation capability is maintained. However, this 24 hour, 96 hour, or 8 day time will only be allowed if the redundant ECCS (in the case of LPCS and LPCI) or trip system (in the case of ADS and HPCS) is maintaining initiation capability.</p> | 3.3.5.1 ACTIONS B and E | Table 3.3.3-1 Actions 30.b and 35.b | 5, 6 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | | |
|---|---|---|--|---|
| L.4 | CTS Table 3.3.3-1 Action 38.a, requires, when one LPCS and LPCI A or one LPCI B and C Injection Valve Reactor Pressure-Low (Permissive) channel is inoperable, the inoperable channel must be removed within 24 hours. This instrumentation provides a permissive to open the LPCI and LPCS injection valves when the reactor pressure has decreased to an acceptable pressure, such that opening the injection valves will not result in overpressurization of the LPCI or LPCS Systems. This requirement has been deleted. The Action assumes the channel fails in the tripped condition, but this is not always true; it can fail such that a trip would not occur. The requirement to remove the inoperable channel within 24 hours is not necessary to ensure the LPCI and LPCS Systems are not overpressurized. | N/A | Table 3.3.3-1 Action 38.a | 4 |
| L.5 | CTS 4.4.2.2, in part, verifies that the low-low set function does not interfere with the OPERABILITY of the ADS by a CHANNEL CALIBRATION. The logic channels associated with the low-low set function are electrically interconnected. However, the only possible impact that could prevent ADS operation is in the common portion of the logic. This logic is energize to operate. Thus, the non-interference requirement for the ADS function is demonstrated through a periodic functional test of the low-low set function, and the CHANNEL CALIBRATION for this purpose is being deleted. | N/A | 4.4.2.2 | 3 |
| L.6 | CTS Table 3.3.3-1 Action 31, which applies to the Functions that control the ECCS minimum flow valves, requires the inoperable channel to be placed in trip. This requirement has not been included in the ITS since placing a channel in trip does not compensate for the inoperability, and it may be a less safe action to take. The ITS only requires the channel to be restored. | 3.3.5.1 ACTION D | Table 3.3.3-1 Action 31 | 5 |
| | | | | |
| 3.3.5.2, RCIC System Instrumentation | | | | |
| LB.1 | The CTS allowance to delay entering the associated Action statement when performing required Surveillances is clarified to allow the Reactor Vessel Water Level - High, Level 8 and Manual Initiation Functions to be inoperable and delay entering the associated Actions for 6 hours, regardless of the remaining RCIC initiation capability of the Function. For these two Functions, loss of one channel results in a loss of RCIC initiation capability. | 3.3.5.2 Surveillance Requirements Note 2 | Table 3.3.5-1 footnote (a) for Functional Units b and c | 6 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | | |
|--|---|-----------------------------|--|----|
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST and the CHANNEL FUNCTIONAL TEST for the Manual Initiation Function. | SR 3.3.5.2.4 | 4.3.5.2, 4.3.5.1 for Table 4.3.5.1-1 Functional Unit c | 10 |
| LE.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION. | SR 3.3.5.2.3 | 4.3.5.1 for Table 4.3.5.1-1 Functional Units a and b | 10 |
| LF.1 | Revises the Current Technical Specifications (CTS) Allowable Values to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy"). | Table 3.3.5.2-1 | Table 3.3.5-2 | 1 |
| L.1 | When one or more inoperable channels exist, in place of the CTS requirement to declare the RCIC System inoperable, the ITS provides an option to place all inoperable channels in the tripped condition, conservatively compensating for the inoperable status, restoring the single failure capability, and providing the required initiation capability of the instrumentation. | 3.3.5.2 Required Action B.2 | Table 3.3.5-1 Action 50.b | 5 |
| | | | | |
| 3.3.6.1, Primary Containment Isolation Instrumentation | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | | |
|------|---|--|--|------|
| LB.1 | <p>The CTS requires that, when the number of OPERABLE channels is less than required by the Minimum OPERABLE Channels per Trip System requirement for one Trip System, the inoperable channel(s) must be placed in the tripped condition within 1 hour for trip functions without an OPERABLE channel. In addition, the CTS requires a channel to be restored to OPERABLE status within 6 hours if placing an inoperable channel in trip causes the Trip Function to occur. CTS also requires that, when the number of OPERABLE channels is less than required by the Minimum OPERABLE Channels per Trip System requirement for both trip systems, then after placing the inoperable channel(s) in one trip system in the tripped condition in 1 hour, the inoperable channel(s) in the remaining trip system must be placed in the tripped condition within 1 hour for trip functions without an OPERABLE channel. In addition, the CTS require the inoperable channel to be restored to OPERABLE status within 1 hour, if placing the inoperable channel in trip causes the Trip Function to occur. The ITS does not include these requirements but does establish the requirement to place the inoperable channel(s) in trip within either 12 or 24 hours, irrespective of the number of inoperable channels in a trip system.</p> | 3.3.6.1 ACTION A | 3.3.2 Action b.1.a), 3.3.2 Action b.1 footnote *, 3.3.2 Action c.2.a)1), 3.3.2 Action c.1, 3.3.2 Actions c.1 and c.2.a) footnote *** | 5, 6 |
| LB.2 | <p>The CTS allows a delay in entering the associated Action statement when performing required Surveillances "provided at least one other OPERABLE channel in the same trip system is monitoring that parameter." These words do not ensure the trip capability of the Function is maintained for all logic system designs. In addition, for those trips systems that have only one channel, the 8 hour allowance has been reduced to 6 hours and the wording has been simplified to require trip capability of the Function to be maintained. The reduction in the allowed out of service time from 8 hours to 6 hours is consistent with the specified reliability analyses. Therefore, the Note has been modified to state "provided the associated Function maintains isolation capability."</p> | 3.3.6.1 Surveillance Requirements Note 2 | Table 3.3.2-1 Note (b) | 6 |
| LD.1 | <p>Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST, the ISOLATION SYSTEM RESPONSE TIME test, and the CHANNEL FUNCTIONAL TEST for the RWCU SLCS Initiation Function and the Manual Initiation Functions.</p> | SR 3.3.6.1.5, SR 3.3.6.1.6 | 4.3.2.2, 4.3.2.3, 4.3.2.1 for Table 4.3.2.1-1 Trip Functions A.3.d and B | 10 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | | |
|------|---|-----------------------------------|--|------|
| LE.1 | Relaxation of Surveillance Frequency from 92 days and 18 months to 24 months for performing the CHANNEL CALIBRATION. | SR 3.3.6.1.4 | 4.3.2.1 for all Table 4.3.2.1-1 Trip Functions except A.1.c.3) | 10 |
| LF.1 | Revises the Current Technical Specifications (CTS) Allowable Values to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy"). | Table 3.3.6.1-1 | Table 3.3.2-2 | 1 |
| L.1 | CTS requires a unit shutdown when a Reactor Vessel Water Level—Low, Level 3 or a Reactor Vessel Water Level — Low Low Low, Level 1 channel is not placed in trip. These Functions actuate TIP Guide Tube Ball Valves and Drywell Pneumatic Valves, respectively, as well as other primary containment isolation valves. The ITS allows isolation of the affected penetration instead of requiring a unit shutdown, when only these valves are affected. | 3.3.6.1 ACTION F | Table 3.3.2-1 Action 20 | 5 |
| L.2 | CTS requires a unit shutdown when a Reactor Vessel Water Level — Low Low Low, Level 1 channel is not placed in trip. The ITS allows isolation of the affected main steam line in lieu of shutting down the unit. | 3.3.6.1 Required Action D.1 | Table 3.3.2-1 Action 20 | 5 |
| L.3 | CTS Table 3.3.2-1 Action 21, which requires the unit to be in STARTUP (Mode 2) with the associated isolation valves closed within 6 hours, is being changed to only require isolation of the associated main steam line within 12 hours. The time allowed to isolate the associated main steam lines is extended from 6 hours to 12 hours to allow for more orderly power reduction. | 3.3.6.1 ACTION D | Table 3.3.2-1 Action 21 | 5, 6 |
| L.4 | The Applicability of the Standby Liquid Control System Initiation Function has been modified from MODES 1, 2, and 3 to MODES 1 and 2, consistent with the SLC System requirements. | Table 3.3.6.1-1 Function 4.1 | Tables 3.3.2-1 and 4.3.2.1-1 Trip Function 3.d | 2 |
| L.5 | Not used. | N/A | N/A | N/A |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
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| | | | | |
|-----|---|--------------------------------------|--|---|
| L.6 | The MODE 1 and 2 Applicability requirements for the Reactor Vessel Water Level—Low, Level 3, have been deleted for the RHR SDC System Group 6 valves. | N/A | Tables 3.3.2-1 and 4.3.2.1-1 Trip Function A.6.a | 2 |
| L.7 | The CTS requires locking the affected system isolation valves closed when the Reactor Vessel Pressure—High Function is inoperable. The ITS only requires closure of the valve, i.e., isolating the penetration; locking is not required. | 3.3.6.1 Required Action F.1 | Table 3.3.2-1 Action 25 | 4 |
| L.8 | The CTS action, associated with the Reactor Vessel Water Level—Low, Level 3 Function, to lock the affected system isolation valves within one hour and declare the affected system inoperable has been modified to immediately initiate action to restore channel to OPERABLE status or initiate action to isolate the Residual Heat Removal Shutdown Cooling System. | 3.3.6.1 Required Actions J.1 and J.2 | Table 3.3.2-1 Action 25 | 5 |
| L.9 | CTS Table 3.3.2-1 ACTION 26 allows 24 hours to restore the Manual Initiation Function to OPERABLE status, provided that the Manual Initiation Function is OPERABLE for each other group valve, inboard or outboard, as applicable, in each line, otherwise the Manual Initiation Function must be restored to OPERABLE status within 8 hours. The restrictions of the allowed out of service time have been deleted and the ITS allows the Manual Initiation Functions to be restored to OPERABLE status in 24 hours, regardless of the status of the manual isolation function of the other valve group. The time allowed in CTS Table 3.3.2-1 ACTION 26 to isolate the associated penetration if a Manual Isolation Function is inoperable has also been extended from 9 hours (8 hours to restore the channel and 1 hour to isolate the penetration) to 24 hours in the ITS. | 3.3.6.1 ACTION G | Table 3.3.2-1 Action 26 | 6 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

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|--|--|-----------------------------------|--|---|
| L.10 | CTS Table 3.3.2-1 requires a Manual Initiation channel (one channel per valve) to be OPERABLE for Groups 3, 8, and 9 inboard and outboard valves. These Function channels are currently being satisfied via each valve's individual control switch. The only RCIC Manual initiation Function available is for the Group 8 outboard isolation valve and this Function only operates with a coincident Reactor Vessel Water Level—Low Level 2 signal as indicated in footnote (h). The Manual Initiation Function for this Group 8 outboard Function is retained in ITS 3.3.6.1 as indicated in Table 3.3.6.1-1 Function 3.j and footnote (b). The requirements for individual control switches are not included in the ITS, since they are not credited in any design bases accident or transient analysis. | N/A | Table 3.3.2-1 Trip Functions B.5 and B.6 | 1 |
| L.11 | The ITS allows the associated SLC subsystem to be declared inoperable in lieu of isolating the RWCU System, as required by the CTS when one or more channels of the SLC System Initiation Function are inoperable and not tripped. | 3.3.6.1 Required Action I.1 | Table 3.3.2-1 Action 22 | 4 |
| | | | | |
| 3.3.6.2, Secondary Containment Isolation Instrumentation | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

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|------|--|---|--|------|
| LB.1 | The CTS requires that, when the number of OPERABLE channels is less than required by the Minimum OPERABLE Channels per Trip System requirement for one Trip System, the inoperable channel(s) must be placed in the tripped condition within 1 hour for trip functions without an OPERABLE channel. In addition, the CTS requires a channel to be restored to OPERABLE status within 6 hours if placing an inoperable channel in trip causes the Trip Function to occur. CTS also requires that, when the number of OPERABLE channels is less than required by the Minimum OPERABLE Channels per Trip System requirement for both trip systems, then after placing the inoperable channel(s) in one trip system in the tripped condition in 1 hour, the inoperable channel(s) in the remaining trip system must be placed in the tripped condition within 1 hour for trip functions without an OPERABLE channel. In addition, the CTS require the inoperable channel to be restored to OPERABLE status within 1 hour, if placing the inoperable channel in trip causes the Trip Function to occur. The ITS does not include these requirements but does establish the requirement to place the inoperable channel(s) in trip within either 12 or 24 hours, irrespective of the number of inoperable channels in a trip system. | 3.3.6.2 ACTION A | 3.3.2 Action b.1.a), 3.3.2 Action b.1 footnote *, 3.3.2 Action c.2.a)1), 3.3.2 Action c.1, 3.3.2 Actions c.1 and c.2.a) footnote *** | 5, 6 |
| LB.2 | The CTS allows a delay in entering the associated Action statement when performing required Surveillances "provided at least one other OPERABLE channel in the same trip system is monitoring that parameter." These words do not ensure the trip capability of the Function is maintained for all logic system designs. In addition, for those trips systems that have only one channel, the 8 hour allowance has been reduced to 6 hours and the wording has been simplified to require trip capability of the Function to be maintained. The reduction in the allowed out of service time from 8 hours to 6 hours is consistent with the specified reliability analyses. Therefore, the Note has been modified to state "provided the associated Function maintains isolation capability." | 3.3.6.1 Surveillance Requirements Note 2 | Table 3.3.2-1 Note (b) | 6 |
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST and the CHANNEL FUNCTIONAL TEST for the Manual Initiation Function. | SR 3.3.6.2.4 | 4.3.2.2, 4.3.2.1 for Table 4.3.2.1-1 Trip Functions B.3 and B.4, 4.6.5.3.d.2 | 10 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

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|------|--|--|---|------|
| LE.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION. | SR 3.3.6.2.3 | 4.3.2.1 for Table 4.3.2.1-1 Trip Functions A.2.a, A.2.b, A.2.c, and A.2.d | 10 |
| LF.1 | Revises the Current Technical Specifications (CTS) Allowable Values to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy"). | Table 3.3.6.2-1 | Table 3.3.2-2 | 1 |
| L.1 | ITS includes Required Actions to require declaring the affected components inoperable and taking the appropriate actions in the associated Secondary Containment Isolation Valve or SGT Systems Specification if the associated penetrations and SGT subsystems are not placed in the proper condition within 1 hour. Currently, a CTS 3.0.3 entry would be required, since no further Actions are provided. | 3.3.6.2 Required Actions C.1.2 and C.2.2 | Table 3.3.2-1 Action 24 | 4, 5 |
| L.2 | The CTS allows 24 hours to restore an inoperable Manual Initiation channel associated with one group if the other Manual Initiation channel is OPERABLE, otherwise only 8 hours is allowed to restore the channels. If this cannot be met the plant must be in MODE 3 in 12 hours and MODE 4 within the following 24 hours, or the affected system isolation valves must be closed within an hour and the affected systems must be declared inoperable. An additional option has been added to place the associated standby gas treatment subsystem(s) in operation in lieu of requiring it to be declared inoperable. | 3.3.6.2 Required Action C.2.1 | Table 3.3.2-1 Action 26 | 5 |
| L.3 | Isolation of secondary containment on Reactor Vessel Water Level—Low Low, Level 2, is required by the CTS to be Operable during CORE ALTERATIONS and operations with a potential for draining the reactor vessel. The ITS does not include the Applicability of CORE ALTERATIONS for this Function, since automatic secondary containment isolation capabilities on reactor vessel water level decreases are not necessary during CORE ALTERATIONS. | N/A | Tables 3.3.2-1 and 4.3.2.1-1, Trip Function A.2.c Applicability, including footnote # | 2 |

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

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| L.4 | The CTS, for Manual Initiation Trip Functions B.3 and B.4, requires the affected system isolation valves to be closed and to declare the affected system inoperable. For this Specification these actions are considered to be applicable to the Secondary Containment Isolation Valves (SCIVs) and Standby Gas Treatment (SGT) System. The ITS Required Actions, as they relate to the SCIVs, allow either of these actions; isolating the associated penetration flow path(s) or declaring the affected components inoperable (and taking the appropriate actions in the associated system Specification). | 3.3.6.2 Required Actions C.1.1 and C.1.2 | Table 3.3.2-1 Action 26.b | 5 |
| 3.3.7.1, CRAF System Instrumentation | | | | |
| LB.1 | If the number of OPERABLE channels per trip system is one less than the minimum required, the CTS requires an inoperable channel to be placed in trip within one hour. The ITS extends this time to 6 hours, provided the CRAF subsystem initiation capability in both trip systems is not lost. | 3.3.7.1 ACTION A | Table 3.3.7.1-1 Action 70.a | 8 |
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST. | SR 3.3.7.1.4 | 4.7.2.d.2 | 10 |
| LE.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION. | SR 3.3.7.1.3 | 4.3.7.1 for Table 4.3.7.1-1 Instrumentation a | 10 |
| LF.1 | Revises the Current Technical Specifications (CTS) Allowable Value to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy"). | SR 3.3.7.1.3 | Table 3.3.7.1-1 | 1 |

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**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

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| L.1 | Revises the Applicability of CTS 3/4.7.2 and CTS 3.3.7.1 for the main control room atmospheric control system radiation monitoring subsystem from Operational Conditions 1, 2, 3, 4, and 5 (the MODE 4 applicability only applies to CTS 3/4.7.2), and when irradiated fuel is being handled in secondary containment to MODES 1, 2, and 3, during movement of irradiated fuel assemblies in secondary containment, during CORE ALTERATIONS, and during operations with the potential for draining the reactor vessel. | 3.3.7.1 | 3/4.7.2, 3.3.7.1, Tables 3.3.7.1-1 and 4.3.7.1-1 | 2 |
| L.2 | With two channels in a trip system inoperable, the CTS requires the CRAF System to be placed in the pressurization mode within 7 days, 6 hours (total time) after two channels in a trip system are inoperable. The ITS provides a total time of 7 days, 7 hours before the CRAF subsystem must be in the pressurization mode. With one channel in a trip system inoperable, the CTS requires the CRAF System to be tripped within 1 hour or placed in operation within the next 1 hour (2 hours total time to be in operation). The ITS provides an additional allowance to declare the CRAF subsystem inoperable within 1 hour when a channel is not tripped. Once declared inoperable, the ITS allows an additional 7 days to place the CRAF in operation.↑ | 3.3.7.1 ACTIONS A and B, 3.7.4 ACTIONS A and C, 3.3.7.1 ACTION B | Table 3.3.7.1-1 Action 70.b, Table 3.3.7.1-1 Actions 70.a and 70.c | 6 |
| | <i>TP additions < Insert L.2 Cold LR.1 ></i> | | | |
| 3.3.8.1, Loss of Power Instrumentation | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST and the CHANNEL FUNCTIONAL TEST portion of the CHANNEL CALIBRATION. | SR 3.3.8.1.3, SR 3.3.8.1.5 | 4.3.3.2, 4.3.3.1 for Table 4.3.3.1-1 Trip Functions D.1 and D.2 | 10 |
| LE.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION. | SR 3.3.8.1.4 | 4.3.3.1 for Table 4.3.3.1-1 Trip Function D.1 | 10 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

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|---|--|-----------------------------|--|----|
| LF.1 | Revises the Current Technical Specifications (CTS) Allowable Values to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy"). | Table 3.3.8.1-1 | Table 3.3.3-2 Trip Functions D.1 and D.2 | 1 |
| | | | | |
| 3.3.8.2, RPS Electric Power Monitoring | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the system functional test. | SR 3.3.8.2.3 | 4.8.3.4.b | 10 |
| LE.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION. | SR 3.3.8.2.2 | 4.8.3.4.b | 10 |
| LF.1 | Revises the Current Technical Specifications (CTS) Allowable Values to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy"). | SR 3.3.8.2.2 | 4.8.3.4.b | 1 |
| L.1 | Changes the Applicability from at all times to only include MODES 1, 2, and 3 and those MODES or Conditions when the RPS, RHR SDC isolation, secondary containment isolation, or SGT System Initiation functions (which are all the Technical Specification required equipment powered from the RPS logic buses) are required. | 3.3.8.2 Applicability | 3.8.3.4 Applicability | 2 |
| L.2 | Extends the allowed out of service time for two Inoperable RPS electric power monitoring assemblies from 30 minutes to 1 hour to provide sufficient time for plant personnel to take corrective actions. | 3.3.8.2 Required Action B.1 | 3.8.3.4 Action b | 6 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

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|--|---|-----------------------------------|------|------|
| L.3 | The CTS does not provide any actions if the RPS EPAs are not restored or the associated RPS MG set or alternate power supply is not removed from service (which de-energizes the associated RPS bus). Thus, CTS 3.0.3 is required to be entered. However, since CTS 3.0.3 is not applicable in MODES 4 and 5, 10 CFR 50.36(c)(2) requires that the licensee notify the NRC if required by 10 CFR 50.72, and a Licensee Event Report (LER) be submitted to the NRC as required by 10 CFR 50.73. In lieu of these two requirements, the ITS provides new ACTIONS if the Required Actions of Condition A or B are not met in MODES other than MODES 1, 2, and 3. The ITS requires action to be initiated to restore one EPA to OPERABLE status for each RPS logic bus or to isolate the Residual Heat Removal (RHR) Shutdown Cooling (SDC) System; requires action to be initiated to fully insert all insertable control rods in core cells containing one or more fuel assemblies; and requires action to be taken to isolate the affected secondary containment penetration flow paths and start the associated SGT subsystems, or to declare the associated SCIVs and SGT subsystems inoperable. | 3.3.8.2 ACTIONS D, E, and F | N/A | 5 |
| | | | | |
| Current Specification 3/4.3.7.3, Meteorological Monitoring Instrumentation | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.3.7.11, Explosive Gas Monitoring Instrumentation | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.3.7.12, Loose Part Detection System | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

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

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|--------------------------------------|--|---------------------------|--|-------------|
| 3.4.1, Recirculation Loops Operating | | | | |
| L.1 <u>Open</u> | The time to adjust power distribution limits and Reactor Protection System and Control Rod Block instrumentation Allowable Values for single loop operation is increased from 4 hours to 12 hours. <u>24</u> | 3.4.1 ACTION G | 3.4.1.1 Action a.1 | 6 |
| L.2 | Extends the time to reach MODE 3 from 6 hours to 12 hours in the event no recirculation loops are in operation. | 3.4.1 ACTION D | 3.4.1.1 Action b.2, 3.4.1.5 Action a.2.c) | 6 |
| L.3 | CTS 4.4.1.3 requires the recirculation loop flow mismatch to be verified within the limits once per 24 hours when in Operational Condition 1 and 2 during two recirculation loop operation. Since CTS 4.4.1.3 cannot be performed prior to its Applicability (as required by CTS 4.0.4) if shifting from single loop to two loop operation while in MODE 1 or 2, a note is added providing an allowance for time to initiate Frequency to avoid intentional entry into the ACTIONS each time the second recirculation pump is started. | SR 3.4.1.1 Note | N/A | 3 |
| | | | | |
| 3.4.2, Flow Control Valves | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 to 24 months for the following Surveillances: Verification each FCV fails "as is" on loss of hydraulic pressure at the hydraulic control unit; and verification that the average rate of FCV movement is within the specific limit ($\leq 11\%/sec$). | SR 3.4.2.1, SR 3.4.2.2 | 4.4.1.1.a, 4.4.1.1.b | 10 |
| | | | | |
| 3.4.3, Jet Pumps | | | | |
| L.1 | Adds a Note to allow a 4-hour delay in performance of the Surveillance after the associated recirculation loop is restored to operation since these checks can only be performed when the loop is in operation. | SR 3.4.3.1 Note 1 | N/A | 3 |

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

| | | | | |
|--------------------------------|--|----------------------------|-------------------------------|---|
| L.2 | Adds a Note that allows 24 hours to perform the jet pump surveillance after THERMAL POWER exceeds 25% RTP, since the data collected during performance of the surveillance < 25% RTP is not meaningful. | SR 3.4.3.1 Note 2 | N/A | 3 |
| L.3 | Deletes the requirement to assess operability of jet pumps that are not in operation, limiting testing to those jet pumps in the operating loop, when in single loop operation. The reverse direction and low flow rates through the jet pumps that are not in operation do not provide meaningful indication of the operability of the jet pumps that are not in operation. | SR 3.4.3.1 | 4.4.1.2.2 | 3 |
| L.4 | Modifies the surveillance acceptance criteria from 10% to 20% for individual jet pump diffuser-to-lower plenum differential pressure variations from the established pattern, consistent with the recommendations of SIL-330 and NUREG/CR-3052. | SR 3.4.3.1 | 4.4.1.2.1, 4.4.1.2.2 | 3 |
| 3.4.4, Safety/Relief Valves | | | | |
| L.1 | Deletes the requirement that all installed S/RVs be closed, since the requirement is essentially covered by other Technical Specifications. | N/A | LCO 3.4.2 | 1 |
| L.2 | Deletes the requirement to verify the low-low set function does not interfere with the OPERABILITY of the S/RVs by a CHANNEL CALIBRATION, since it is not necessary to ensure the OPERABILITY of the safety function of the S/RVs. | N/A | 4.4.2.2 | 3 |
| L.3 | Not used <i>Modifies a Note to allow one or two required S/RVs to be replaced with S/RVs with lower setpoint values indefinitely in lieu of until the next refueling outage.</i> | <i>SR 3.4.4.1 Note</i> | <i>LCO 3.4.2 footnote</i> | 1 |
| 3.4.5, RCS Operational Leakage | | | | |
| L.1 | Extends the Surveillance Frequency for verifying the RCS operational leakage is within limits from "8 hours not to exceed 12 hours" to "12 hours." | SR 3.4.5.1 | 4.4.3.2.1 | 3 |
| L.2 | Deletes the MODES 2 and 3 Applicability requirement for the unidentified LEAKAGE rate increase limit, since as a plant starts up and increases pressure, leakage will occur due to the increased pressure. | LCO 3.4.5.d | 3.4.3.2.e | 2 |

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**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM**

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| | | | | |
| 3.4.6, RCS Pressure Isolation Valve Leakage | | | | |
| L.1 | Currently, PIV leakage limits of CTS 3.4.3.2 are required to be met in MODES 1, 2, and 3. A MODE 3 exception is included in the APPLICABILITY of ITS 3.4.6 for valves in the shutdown cooling flow path when needed for the shutdown cooling function. | 3.4.6 | 3.4.3.2 | 2 |
| L.2 | Revises the requirement to isolate the high-pressure portion of the affected system from the low-pressure portion within 4 hours using at least two closed valves has been revised to require one valve to be closed within 4 hours and a second valve to be closed within 72 hours. | 3.4.6 Required Actions A.1 and A.2 | 3.4.3.2 Action c | 6 |
| L.3 | Deletes the explicit post maintenance PIV leak check Surveillance Requirement (i.e., each PIV shall be demonstrated OPERABLE by leak testing before returning the PIV to service following maintenance, repair, or replacement work on the PIV), as it is redundant to SR 3.0.1 and the definition of OPERABILITY. | N/A | 4.4.3.2.2.a.2 | 3 |
| L.4 | Revises the limit on PIV leakage from 1 gpm per valve to specify leakage based on valve size with a maximum limit of 5 gpm per valve. | SR 3.4.6.1 | LCO 3.4.3.2.d | 1 |
| | | | | |
| 3.4.7, RCS Leakage Detection Instrumentation | | | | |
| LE.1 | Relaxation of the Surveillance Frequency from 18 to 24 months for performing the Channel Calibrations of the RCS leakage detection instrumentation. | SR 3.4.7.3 | 4.4.3.1.a, 4.4.3.1.b, 4.4.3.1.c | 10 |
| L.1 | CTS 3.4.3.1 requires the primary containment atmospheric particulate, sump flow, and either the air coolers condensate flow rate or atmospheric gaseous radioactivity monitoring systems to be OPERABLE. These required RCS leakage detection monitoring systems are rearranged in ITS 3.4.7 to require one method that can quantify the unidentified leakage and two diverse detection methods that provide indication of increased leakage. Associated Actions and Surveillance Requirements are revised accordingly. | LCO 3.4.7, 3.4.7 ACTIONS A, B, C, and D, SR 3.4.7.1, SR 3.4.7.2, SR 3.4.7.3 | LCO 3.4.3.1.a and c, 3.4.3.1 Action, 4.4.3.1.a | 1 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM**

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|--|--|---|--|---|
| L.2 | Adds a Note that LCO 3.0.4 is not applicable for the condition of the primary containment sump flow rate monitoring system or the combination of an inoperable atmospheric monitoring system and primary containment air cooler condensate flow rate inoperable. | 3.4.7 ACTIONS A and D Note | N/A | 7 |
| L.3 | Adds a Note to allow a channel to be inoperable for up to 6 hours solely for performance of required Surveillances provided the other Leakage Detection System channel is OPERABLE. | 3.4.7 Surveillance Requirements Note | N/A | 6 |
| | | | | |
| 3.4.8, RCS Specific Activity | | | | |
| L.1 | Deletes requirement to maintain specific activity $\leq 100/\text{E-bar } \mu\text{Ci/gm}$. | N/A | LCO 3.4.5.b, 3.4.5 Actions a.2 and b, Table 4.4.5-1 Items 1 and 3, including footnote * | 1 |
| L.2 | Changes the Applicability from Operational Conditions 1, 2, 3, and 4 to MODE 1 and Modes 2 and 3 with any main steam line not isolated (i.e., those conditions which represent a potential for release of significant quantities of radioactive coolant to the environment). Actions are modified to reflect the new Applicability, and an option for exiting the applicable MODES is provided for cases where isolation is not desired. | 3.4.8 Applicability, 3.4.8 ACTION B | 3.4.5 Applicability, 3.4.5 Actions a, a.1, and b, Table 4.4.5-1 Item 4 | 2 |
| L.3 | Adds a Note to indicate that LCO 3.0.4 is not applicable during the first 48 hours of failure to meet the LCO limit provided the specific activity is $\leq 4.0 \mu\text{Ci/gm DEI}$. | 3.4.8 ACTION A Note | N/A | 7 |
| | | | | |
| 3.4.9, RHR Shutdown Cooling System - Hot Shutdown | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM**

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|--|--|---|--|------|
| L.1 | Revises requirements to allow a recirculation pump to be in operation in lieu of a shutdown cooling mode loop of the RHR System, consistent with the allowance in CTS 4.4.9.1 that an "alternate method" is acceptable. | LCO 3.4.9, 3.4.9 ACTION B, SR 3.4.9.1 | LCO 3.4.9.1, 3.4.9.1 Action b, 4.4.9.1 | 1, 4 |
| L.2 | Adds Notes making LCO 3.0.4 and SR 3.0.4 not applicable to provide the necessary time to place the system in service following the reduction of pressure to below the cut-in permissive pressure setpoint, since the system cannot be placed in service until the suction valves high pressure closure interlock is cleared. | 3.4.9 ACTION Note 1, SR 3.4.9.1 Note | N/A | 7 |
| L.3 | CTS 3.4.9.1 footnote # allows one RHR shutdown cooling loop to be inoperable for 2 hours for surveillance testing, provided the other loop is Operable and in operation. CTS 3.4.9.1 footnote * allows the RHR shutdown cooling pump to be removed from operation for up to 2 hours per 8 hour period, provided the other loop is Operable. The requirements are changed to delete the "provided" requirements. | LCO 3.4.9 Notes 1 and 2 | LCO 3.4.9.1 footnotes # and * | 1 |
| | | | | |
| 3.4.10, RHR Shutdown Cooling System - Cold Shutdown | | | | |
| L.1 | Revises requirements to allow a recirculation pump to be in operation in lieu of a shutdown cooling mode loop of the RHR System, consistent with the allowance in CTS 4.4.9.2 that an "alternate method" is acceptable. | LCO 3.4.10, 3.4.10 ACTION B, SR 3.4.10.1 | LCO 3.4.9.2, 3.4.9.2 Action b, 4.4.9.2 | 1, 4 |
| L.2 | CTS 3.4.9.2 footnote # allows one RHR shutdown cooling loop to be inoperable for 2 hours for surveillance testing, provided the other loop is Operable and in operation. CTS 3.4.9.2 footnote ** allows the RHR shutdown cooling pump to be removed from operation for up to 2 hours per 8 hour period, provided the other loop is Operable. The requirements are changed to delete the "provided" requirements. | LCO 3.4.10 Notes 2 and 3 | LCO 3.4.9.2 footnotes # and ** | 1 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM**

| | | | | |
|--|---|----------------------------|----------------------------|------|
| L.3 | Revises the CTS footnote that allows the RHR shutdown cooling mode loop to be removed from operation during hydrostatic testing to also allow the system to be inoperable during hydrostatic testing, since the RHR Shutdown Cooling System is in fact inoperable during hydrostatic testing. | LCO 3.4.10 Note 1 | LCO 3.4.9.2 footnote ## | 1 |
| | | | | |
| 3.4.11, RCS Pressure and Temperature Limits | | | | |
| NONE | NONE | NONE | NONE | NONE |
| 3.4.12, Reactor Steam Dome Pressure | | | | |
| L.1 | Slightly increases the reactor steam dome pressure limit to allow pressure to be equal to 1020 psig and still be within the limit, since the safety analysis described in the UFSAR (overpressure protection analysis) assumes the initial reactor steam dome pressure is 1020 psig, not less than 1020 psig. | LCO 3.4.12, SR 3.4.12.1 | LCO 3.4.6.2, 4.4.6.2 | 1 |
| | | | | |
| Current Specification 3/4.4.8, Structural Integrity | | | | |
| NONE | NONE | NONE | NONE | NONE |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|------------------------------|--|--|--|-------------|
| 3.5.1, ECCS-Operating | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 to 24 months for the following Surveillances: Verification that each ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal; verification that ADS actuates on an actual or simulated automatic initiation signal; verification that each required ADS valve strokes when manually actuated. | SR 3.5.1.6, SR 3.5.1.7, SR 3.5.1.8 | 4.5.1.c.1, 4.5.1.d.2.a), 4.5.1.d.2.b) | 10 |
| L.1 | Relaxation in pressure at which ADS is required to be OPERABLE, from 122 psig to 150 psig. | LCO 3.5.1, 3.5.1 ACTION G | LCO 3.5.1.a.3 and LCO 3.5.1.b.2, including footnote *, 3.5.1 Actions e.1 and e.2 | 2 |
| L.2 | Elimination of the requirement to submit a Special Report for ECCS actuation and injection as it is adequately addressed by 10 CFR 50.73(a)(2)(iv). | N/A | 3.5.1 Action i | 9 |
| L.3 | Addition of a Note to allow operation of one or more of the RHR subsystems in the shutdown cooling mode during MODE 3, if necessary, and clarifies that the subsystems may still be considered OPERABLE for the LPCI mode. | LCO 3.5.1 | LCO 3.5.1 | 1 |
| L.4 | Addition of the phrase "actual or," in reference to the automatic initiation signal for the Surveillance Requirements that verify each ECCS subsystem and ADS actuates on a "simulated" automatic initiation signal. | SR 3.5.1.6, SR 3.5.1.7 | 4.5.1.c.1, 4.5.1.d.2.a) | 3 |
| L.5 | Deletion of the ECCS discharge line keep fill and differential pressure instrumentation and the associated Actions for inoperable instrumentation and supporting Surveillances, since ITS does not specify alarm-only equipment to be OPERABLE to support OPERABILITY of a system or component. | N/A | 3.5.1 Action f, 3.5.1 Action g, 4.5.1.a.2, 4.5.1.c.2 | 3 |


**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM**

| | | | | |
|----------------------|---|---------------------------------|-----------------------------------|----|
| L.6 | Relaxes the requirement such that HPCS cannot be inoperable when the RCIC System is inoperable and it is "required to be OPERABLE." Currently, HPCS cannot be inoperable when the RCIC System is inoperable, even if the RCIC System is not required to be OPERABLE. | 3.5.1 ACTION B | 3.5.1 Action c | 4 |
| | | | | |
| 3.5.2, ECCS-Shutdown | | | | |
| L.1 | Deletion of requirements to: 1) suspend CORE ALTERATIONS when both ECCS subsystems are inoperable; and 2) suspend CORE ALTERATIONS when the suppression chamber water level requirement is not within limit. | N/A | 3.5.2 Action b, 3.5.3 Action b | 4 |
| L.2 | Deletes the requirement to "lock" the reactor mode switch in shutdown when the suppression pool is not within the required limit. The position of the reactor mode switch is controlled by the MODES definition Table. | N/A | 3.5.3 Action b | 8 |
| L.3 | CTS 3.5.3, Action b requires the establishment of Secondary Containment Integrity within 8 hours if the suppression pool water level is not within limits in MODES 4 and 5. ITS 3.5.2 Required Action C.2 has been added delaying this current ACTION for 4 hours to provide time to restore the limit (i.e., by restoring the affected ECCS subsystem to OPERABLE status). This 4 hour time is consistent with CTS LCO 3.5.2, Action b, which provides 4 hours to restore an inoperable ECCS subsystem with both required ECCS subsystems are inoperable, prior to the requirement to establish Secondary Containment Integrity. | 3.5.2 Required Action C.2 | 3.5.3 Action b | 6 |
| L.4 | Addition of a Note to allow operation of one RHR subsystem in the shutdown cooling mode during MODE 3, if necessary, and clarifies that the subsystem may still be considered OPERABLE for the LPCI mode. | LCO 3.5.2 | LCO 3.5.2 | 1 |
| | | | | |
| 3.5.3, RCIC System | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 to 24 months for the following Surveillances: RCIC system functional test and the RCIC low pressure flow test. | SR 3.5.3.4, SR 3.5.3.5 | 4.7.3.c.1, 4.7.3.c.2 | 10 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM**

| | | | | |
|-----|--|------------|--|---|
| L.1 | Addition of the phrase "actual or," in reference to the automatic initiation signal for the Surveillance Requirement that verifies the RCIC System actuates on a "simulated" automatic initiation signal. | SR 3.5.3.5 | 4.7.3.c.1 | 3 |
| L.2 | Deletion of the RCIC System discharge line keep fill instrumentation and the associated Actions for inoperable instrumentation and supporting Surveillances, since ITS does not specify alarm-only equipment to be OPERABLE to support OPERABILITY of a system or component. | N/A | 3.7.3 Action a, 4.7.3.a.2, 4.7.3.c.3 | 3 |
| | | | | |

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|---|---|---------------------|------------------|-------------|
| 3.6.1.1, Primary Containment | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months (routine test) and 9 months to 12 months (reduced frequency test) for performing the drywell-to-suppression chamber bypass leakage test. | SR 3.6.1.1.3 | 4.6.2.1.d | 10 |
| L.1 | In the ITS presentation, drywell-to-suppression chamber bypass leakage outside limits will result in declaring the Primary Containment inoperable, requiring commencing a shutdown to MODES 3 and 4 if the leakage problem is not corrected within 1 hour. The CTS only restricts heating up reactor coolant above 200°F (i.e., entry into MODE 3). With the drywell-to-suppression chamber bypass leakage outside of limits in MODE 1, 2, or 3, the CTS does not provide actions. Since drywell-to-suppression chamber leakage are attributes of maintaining Primary Containment Integrity, a 1 hour allowed outage time is provided for this condition consistent with the primary containment is inoperable. | 3.6.1.1 ACTION A | 3.6.2.1 Action e | 6 |
| L.2  | Deletes the CTS requirement to verify drywell-to-suppression chamber bypass leakage is within limits on an accelerated test basis and at a higher test pressure in the event that the results of consecutive drywell-to-suppression chamber bypass leakage tests are outside Technical Specification specified limits. | N/A | 4.6.2.1.d.2 | 3 |
| L.3 | Not used. | N/A | N/A | N/A |
| L.4 | Not used. | N/A | N/A | N/A |
| L.5 | Deletes the requirement for the NRC to review the test schedule for subsequent tests if any drywell-to-suppression chamber bypass leakage rate test result is not within the required limits since the NRC has already approved the test schedule in the Technical Specification. | N/A | 4.6.2.1.d | 9 |
| | | | | |

Rev D

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

| 3.6.1.2, Primary Containment Air Lock | | | | |
|---------------------------------------|---|--------------------------------------|-----------------------------|---|
| L.1 | Adds ITS ACTIONS Note to allow entry through a closed or locked air lock door for the purpose of making repairs. The proposed allowance will have strict administrative controls, which are detailed in the Bases. | 3.6.1.2 ACTIONS Note 1 | <u>3.6.1.3 Actions</u> N/A | 4 |
| L.2 | Adds ITS Required Action Note to allow entry through a closed and/or locked OPERABLE air lock door (for reasons other than repairs) for a limited period of time (i.e., 7 days). The allowance is proposed to have strict administrative controls, which are detailed in the Bases. | 3.6.1.2 Required Action A Note 2 | <u>3.6.1.3 Action a</u> N/A | 4 |
| L.3 | Not used INSERT L.3 | 3.6.1.2 Required Actions A.1 and C.2 | 3.6.1.3 Actions a.1 and b | 6 |
| L.4 | Adds ITS Required Action Note to allow administrative means to be used to verify a locked closed OPERABLE air lock door in high radiation areas or areas with limited access due to inerting. | 3.6.1.2 Required Action A.3 Note | 3.6.1.3 Action a | 4 |
| L.5 | Currently, if the interlock mechanism is inoperable, a CTS action requires it to be restored in 24 hours or a shutdown is required. An ITS ACTION is added to specifically address the inoperable air lock interlock mechanism. Provided one inoperable air lock door in the air lock can be maintained closed, the assumptions of the accident analysis are maintained and operation should be allowed to continue. This closed OPERABLE door is also required to be locked to assure it remains closed. In the event containment access is desired, it is proposed containment access be allowed under strict administrative control. To provide a level of assurance equivalent to the mechanical interlock that at least one operable door will remain closed at all times during entry and exit, the proposed change requires an individual dedicated to assure that two doors are not open simultaneously and one door is re-locked prior to leaving. In addition, due to this new ACTION, the CTS action has been modified to also not be applicable if the air lock is inoperable as a result of an inoperable interlock mechanism. | 3.6.1.2 ACTION B | <u>3.6.1.3 Action b</u> N/A | 4 |

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in CTS. 1

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See
Comment
3

INSERT L.3 (LCO 3.6.1.2 LaSalle)

In reference to the CTS action to immediately maintain an air lock door closed, changes the word "maintain" to "verify" and 1 hour is allowed to complete the verification in the ITS..

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS**

| | | | | |
|--|--|--|--|----|
| L.6 | Change the Frequency for the air lock interlock test from once per 6 months only upon entry into the primary containment air lock when primary containment is de-inerted, to 24 months. | SR 3.6.1.2.2 | 4.6.1.3.b and footnote ** | 3 |
| | | | | |
| 3.6.1.3, Primary Containment Isolation Valves | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the automatic PCIV actuation test, EFCV actuation test, and TIP squib valve initiation test. | SR 3.6.1.3.7, SR 3.6.1.3.8, SR 3.6.1.3.9 | 4.6.3.2, 4.6.3.3, 4.6.3.5.b | 10 |
| L.1 | CTS 3.6.3 Action a requires an inoperable PCIV to be restored or the affected penetration isolated in 4 hours. CTS 3.4.7 Action 1 also requires an inoperable MSIV (which is a PCIV) to be restored or the affected penetration isolated in 8 hours. CTS 3.6.1.8 Action requires an open (i.e., inoperable) purge valve to be closed within 1 hour. The ITS allows 4 hours to isolate the affected penetration when a purge valve is inoperable, 8 hours to isolate the affected penetration when an MSIV is inoperable, and 72 hours to isolate the affected penetration when a PCIV is inoperable in a penetration with a closed system (as specifically defined in NUREG-0800) or in a penetration whose system piping communicates with the suppression pool and is expected to remain submerged during the accident (i.e., a closed system as defined in the UFSAR), and only one PCIV. | 3.6.1.3 Required Actions A.1 and C.1 | 3.6.3 Action a, 3.4.7 Action 1, 3.6.1.8 Action | 6 |
| L.2 | The CTS list some, but not all, of the possible acceptable isolation devices that may be used to satisfy the need to isolate a penetration with an inoperable isolation valve. The ITS provides a complete list of acceptable isolation devices. | 3.6.1.3 ACTIONS A, B, and C | 3.6.3 Action a, 3.4.7 Action 1, 4.6.1.1.a | 4 |
| L.3 | In the event two or more valves in a penetration are inoperable, CTS 3.6.3 Action a and CTS 3.4.7 Action 1, which require maintaining one isolation valve OPERABLE, would not be met and an immediate shutdown would be required. The ITS provides 1 hour prior to commencing a required shutdown, consistent with the existing time allowed for conditions when the primary containment is inoperable. | 3.6.1.3 ACTION B | 3.6.3 Action a, 3.4.7 Action 1 | 6 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS**

| | | | | |
|------|---|---|--|------|
| L.4 | Extends from 4 hours to 72 hours the time to either repair the inoperable excess flow check valve or isolate the associated instrument. | 3.6.1.3 Required Action C.1 | 3.6.3 Action b.1 | 6 |
| L.5 | Adds an allowance for intermittently opening, under administrative control, closed primary containment isolation valves, other than those currently allowed to be opened using CTS 3.6.3 footnote ** and Action footnote *. | 3.6.1.3 ACTIONS Note 1, SR 3.6.1.3.2 and SR 3.6.1.3.3 Note 2 | 3.6.3 footnote **, 3.6.3 Action footnote * | 1, 4 |
| L.6 | Deletes CTS 4.6.3.1, since explicit post maintenance Surveillance Requirements are not required. | N/A | 4.6.3.1 | 3 |
| L.7 | Not used. < INSERT L.7 > | N/A | 4.6.3.2 | 3 |
| L.8 | Addition of the phrase "actual or," in reference to the automatic isolation signal for the Surveillance that verifies each PCIV actuates on an automatic isolation "test" signal. | SR 3.6.1.3.7 | 4.6.3.2 | 3 |
| L.9 | Deletes the requirement that each excess flow check valve must check flow. The ITS requires the EFCVs to actuate to their isolation position (i.e., closed) on an actual or simulated Instrument line break signal. | SR 3.6.1.3.9 | 4.6.3.4 | 3 |
| L.10 | Adds Note to allow the verification of the isolation devices used to isolate the penetrations in high radiation areas to be verified by use of administrative means. In addition, adds a Note to allow verification of isolation devices that are locked, sealed, or otherwise secured to also be performed using administrative means. | 3.6.1.3 Note 1 to Required Actions A.2 and C.2, SR 3.6.1.3.2, SR 3.6.1.3.3, 3.6.1.3 Note 2 to Required Actions A.2 and C.2 | 4.6.1.1.a | 3, 4 |

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5

INSERT L.7 (LCO 3.6.1.3 LaSalle)

The requirement to perform CTS 4.6.3.1 during COLD SHUTDOWN or REFUELING has been deleted, since the control of plant conditions appropriate to perform the test is an issue for procedures and scheduling, and has been determined by the NRC Staff to be unnecessary as a Technical Specification restriction as indicated in Generic Letter 91-04.

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS**

| | | | | |
|---|---|-------------------------------|--|------|
| L.11 | The requirements related to verification of the position of primary containment isolation manual valves and blind flanges, are revised in the ITS to exclude verification of manual valves and blind flanges that are locked, sealed, or otherwise secured in the correct position. | SR 3.6.1.3.2, SR 3.6.1.3.3 | 4.6.1.1.a, including footnote ** | 3 |
| L.12 | The CTS limits the reason (inerting, deinerting, and pressure control) and the time (90 hours per 365 days) the 8 inch and 26 inch purge valves can be open for purging operations through the Standby Gas Treatment System, and also requires a verification that the time limit has not been exceeded prior to opening the valves. The ITS does not include the time limitations, and replaces them with specific criteria for opening. | SR 3.6.1.3.1 Note | 3.6.1.8, 4.6.1.8.1 | 1, 3 |
| L.13 | When MSIV leakage rate or hydrostatically tested line leakage rate is not within the limit, one or more PCIVs would be considered inoperable. In this condition, CTS 3.6.3 Action a would require restoration of the inoperable PCIV or isolation of the penetration within 4 hours provided there is at least one Operable PCIV in the affected penetration. Otherwise, CTS 3.6.3 Action a would require the unit to be in Hot Shutdown within the next 12 hours and in Cold Shutdown in the following 24 hours. The times to restore leakage have been modified in the ITS to be 4 hours for hydrostatically tested line leakage not on a closed system, 8 hours for MSIV leakage), and 72 hours for valves in hydrostatically tested lines on a closed system. | 3.6.1.3 ACTION D | 3.6.3 Action a | 6 |
| 3.6.1.4, Drywell and Suppression Chamber Pressure | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.1.5, Drywell Air Temperature | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS**

| 3.6.1.6, Suppression Chamber-to-Drywell Vacuum Breakers | | | | |
|---|--|--|-------------------------------------|------|
| LD.1 | Relaxation of the Surveillance Frequency from 18 months to 24 months for performing the verification that the opening setpoint of each vacuum breaker is \leq 0.5 psid. | SR 3.6.1.6.3 | 4.6.4.1.b.2 | 10 |
| L.1 | Relaxation of the Surveillance Frequency from 31 days to 92 days for cycling the vacuum breakers. | SR 3.6.1.6.2 | 4.6.4.1.b.1 | 3 |
| | | | | |
| 3.6.2.1, Suppression Pool Average Temperature | | | | |
| L.1 | Removes the details of how to reduce suppression pool temperature to within the limits (by operating at least one residual heat removal loop in the suppression pool cooling mode). | N/A | 3.6.2.1 Action b.1 | 4 |
| L.2 | When the suppression pool temperature is $> 105^{\circ}\text{F}$ but $\leq 110^{\circ}\text{F}$, the CTS requires a 30 minute suppression pool temperature verification and an hourly power level verification. When suppression pool temperature is $> 105^{\circ}\text{F}$ and $\leq 110^{\circ}\text{F}$, and power is $> 1\%$ RTP, ITS requires verification of suppression pool temperature once per hour in this condition. If $< 1\%$ RTP, SR 3.6.2.1.1 verification of temperature every 24 hours is sufficient. | 3.6.2.1 Required Action A.2, SR 3.6.2.1.1 | 4.6.2.1.b.3, 4.6.2.1.b.2 | 3, 6 |
| | | | | |
| 3.6.2.2, Suppression Pool Water Level | | | | |
| L.1 | Extends from 1 hour to 2 hours the time to restore level when the suppression pool water level is outside the limits. | 3.6.2.2 Required Action A.1 | 3.6.2.1 Action a, 3.5.3 Action a | 6 |
| | | | | |
| 3.6.2.3, RHR Suppression Pool Cooling | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS**

| | | | | |
|---|--|-------------------------------|-----------------------------------|------|
| L.1 | Extends from 72 hours to 7 days the restoration time when one subsystem is inoperable. In addition, a restoration time (8 hours) when both suppression pool cooling subsystems are inoperable has been provided. Currently, no time is provided; CTS 3.6.2.3 Action b requires a unit shutdown. | 3.6.2.3 ACTIONS A and B | 3.6.2.3 Actions a and b | 6 |
| | | | | |
| 3.6.2.4, RHR Suppression Pool Spray | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.3.1, Primary Containment Hydrogen Recombiners | | | | |
| LD.1 | Relaxation of the Surveillance Frequency from 18 months to 24 months for performing the system functional test for each hydrogen recombiner and for performing a resistance to ground test for each heater phase. | SR 3.6.3.1.1, SR 3.6.3.1.2 | 4.6.6.1.b, 4.6.6.1.c.2 | 10 |
| L.1 | Adds a statement that LCO 3.0.4 is not applicable for the condition of one hydrogen recombiner inoperable. | 3.6.3.1 ACTION A Note | 3.6.3.1 Actions N/A | 7 |
| L.2 | Adds an ACTION for the condition of both containment hydrogen recombiners inoperable, with a 7 day Completion Time to restore at least one of the recombiners to OPERABLE status before requiring a shutdown, provided the hydrogen control function is maintained. CTS provides no actions for this condition, requiring a 3.0.3 entry. | 3.6.3.1 ACTION B | 3.0.3 | 4, 6 |
| L.3 | Not used. | N/A | N/A | N/A |
| L.4 | Deletes the CHANNEL CALIBRATION surveillance for the hydrogen recombiner instrumentation and control circuits. | N/A | 4.6.6.1.c.1 | 3 |
| | | | | |
| 3.6.3.2, Primary Containment Oxygen Concentration | | | | |

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TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

| NONE | NONE | NONE | NONE | NONE |
|---|--|---|-------------------------------|------|
| | | | | |
| 3.6.4.1, Secondary Containment | | | | |
| LD.1 | Relaxation of the Surveillance Frequency from 18 months to 24 months for performing CTS 4.6.5.1.c.1 and 4.6.5.1.c.2, which ensure that the Secondary Containment is OPERABLE to support the drawdown analysis. | SR 3.6.4.1.3, SR 3.6.4.1.4 | 4.6.5.1.c.1, 4.6.5.1.c.2 | 10 |
| | | | | |
| 3.6.4.2, Secondary Containment Isolation Valves | | | | |
| LD.1 | Relaxation of the Surveillance Frequency from 18 months to 24 months for verification that each automatic SCIV actuates to the isolation position on an actual or simulated automatic isolation signal. | SR 3.6.4.2.3 | 4.6.5.2.b | 10 |
| L.1 | Adds an allowance for intermittently opening, under administrative control, closed secondary containment isolation valves under, as is allowed in the existing primary containment Technical Specifications (CTS 3.6.3) and in ITS 3.6.1.3. | 3.6.4.2 ACTIONS Note 1, SR 3.6.4.2.1 Note 2 | <u>3.6.5.2 Actions</u> N/A | 1 |
| L.2 | In the event both dampers in a penetration are inoperable in an open penetration, the CTS 3.6.5.2 Action, which requires maintaining one isolation damper OPERABLE, would not be met and an immediate shutdown would be required. The ITS provides 4 hours prior to commencing a required shutdown, consistent with the existing time allowed for conditions when the secondary containment is inoperable. | 3.6.4.2 ACTION B | 3.6.5.2 Action | 6 |
| L.3 | Deletes CTS 4.6.5.2.a, since explicit post maintenance Surveillance Requirements are not required. | N/A | 4.6.5.2.a | 3 |

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**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS**

| | | | | |
|--|---|--|-----------------------|------|
| L.4 | The requirement to perform CTS 4.6.5.2.b during COLD SHUTDOWN or REFUELING has been deleted, since the control of the plant conditions appropriate to perform the test is an issue for procedures and scheduling, and has been determined by the NRC Staff to be unnecessary as a Technical Specification restriction as indicated in Generic Letter 91-04. | N/A | 4.6.5.2.b | 3 |
| L.5 | Addition of the phrase "actual or," in reference to the automatic isolation signal for the Surveillance Requirement that verifies each SCIV actuates on an automatic isolation "test" signal. | SR 3.6.4.2.3 | 4.6.5.2.b | 3 |
| L.6 | Adds Notes to allow the verification of the isolation devices used to isolate the penetrations in high radiation areas to be verified by use of administrative controls. | 3.6.4.2 Required Action A.2 Note 1, SR 3.6.4.2.1 Note 1 | 4.6.5.1.b.2 | 3, 4 |
| L.7 | The requirements related to verification of the position of secondary containment isolation penetrations not capable of being closed by OPERABLE secondary containment isolation valves (SCIVs), are revised in the ITS to exclude verification of manual valves and blind flanges that are locked, sealed, or otherwise secured in the correct position. | 3.6.4.2 Required Action A.2 Note 2, SR 3.6.4.2.1 | 4.6.5.1.b.2 | 3, 4 |
| | | | | |
| 3.6.4.3, Standby Gas Treatment System | | | | |
| LD.1 | Relaxation of the Surveillance Frequency from 18 months to 24 months for verification that each SGT subsystem actuates on an actual or simulated automatic initiation signal. | SR 3.6.4.3.3 | 4.6.5.3.d.2 | 10 |
| L.1 | The CTS requires suspending operations if an SGT subsystem cannot be returned to OPERABLE status within 7 days, and movement of irradiated fuel assemblies, CORE ALTERATIONS, or OPDRVs are being conducted. As an alternative, the ITS will allow the OPERABLE SGT subsystem to be placed in operation and continue to conduct operations (e.g., OPDRVs). | 3.6.4.3 Required Action C.1 | 3.6.5.3 Action a.2 | 4 |

Move to Section 3.6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

| | | | | |
|-----|--|--------------|-------------|---|
| L.2 | Addition of the phrase "actual or," in reference to the automatic initiation signal for the Surveillance that verifies each subsystem actuates on an automatic initiation "test" signal. | SR 3.6.4.3.3 | 4.6.5.3.d.2 | 3 |
| | | | | |

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|---|--|------------------------|--------------------------|-------------|
| 3.7.1, Residual Heat Removal Service Water System | | | | |
| L.1 | Extends the time to restore the inoperable RHRSW subsystem from 72 hours to 7 days. | 3.7.1 ACTION A | 3.7.1.1 Action a.1 | 6 |
| L.2 | A restoration time (8 hours) when both RHRSW subsystems are inoperable is provided. Currently, no time is provided; CTS requires a unit shutdown. | 3.7.1 ACTION B | 3.7.1.1 Action a.2 | 6 |
| | | | | |
| 3.7.2, Diesel Generator Cooling Water System | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 to 24 month for the DGCW automatic start Surveillance. | SR 3.7.2.2 | 4.7.1.2.b | 10 |
| L.1 | Adds the phrase "actual or simulated," in reference to the automatic initiation signal, to the Surveillance Requirements that verify each DGCW subsystem actuates on a "start" signal. | SR 3.7.2.2 | 4.7.1.2.b.1, 4.7.1.2.b.2 | 3 |
| | | | | |
| 3.7.3, Ultimate Heat Sink | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 to 24 month for the determination of sediment deposition and the pond bottom elevation. | SR 3.7.3.2, SR 3.7.3.3 | 4.7.1.3 | 10 |
| | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS**

| 3.7.4, Control Room Area Filtration System | | | | |
|--|---|---|-----------------|------|
| LD.1 | Relaxation of Surveillance Frequency from 18 to 24 month for the CRAF System automatic initiation and operation Surveillance. | SR 3.7.4.4, SR 3.7.4.5 | 4.7.2.d.2 | 10 |
| L.1 | Revises the MODES 4 and 5 portion of the Applicability to be only during CORE ALTERATIONS or during OPDRVs. | 3.7.4 | 3.7.2 | 2 |
| L.2 | Deletes the CRAF System staggered testing requirements for the 31 day operation test. | SR 3.7.4.1, SR 3.7.4.2 | 4.7.2.a | 3 |
| L.3 | Adds the phrase "actual or," in reference to the actuation test signal that verifies that each CRAF subsystem actuates on an actuation test signal. | SR 3.7.4.4 | 4.7.2.d.2 | 3 |
| | | | | |
| 3.7.5, Control Room Area Ventilation Air Conditioning System | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.7.6, Main Condenser Offgas | | | | |
| L.1 | Changes the Applicability from "MODES 1, 2, and 3" to "MODE 1" and "MODES 2 and 3 with any main steam line not isolated and steam jet air ejector (SJAE) in operation." Also adds new Required Action to isolate the air ejector, when the release rate is not restored to within limits in 72 hours. | LCO 3.7.6, 3.7.6 Required Action B.2 | LCO 3.11.2.2 | 2 |
| L.2 | Extends the time allowed to close the main steam isolation valves from 6 hours to 12 hours. | 3.7.6 ACTION B | 3.11.2.2 Action | 5 |
| L.3 | Adds new Required Actions that require the plant to be in MODE 3 in 12 hours and MODE 4 in 36 hours, which exits the new Applicability of the LCO. | 3.7.6 Required Actions B.3.1 and B.3.2 | N/A | 5 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS**

| | | | | |
|--|--|---------------------------|---------------------------|------|
| L.4 | Adds a Note that allows the Surveillance to not be performed until 31 days after any main steam line is not isolated and the SJAE is in operation, since this determination is only meaningful with one or more main steam lines not isolated and the SJAE in operation. | SR 3.7.6.1 Note | N/A | 3 |
| | | | | |
| 3.7.7, Main Turbine Bypass System | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 to 24 months for performing the system functional test and the TURBINE BYPASS SYSTEM RESPONSE TIME test. | SR 3.7.7.2, SR 3.7.7.3 | 4.7.10.b.1, 4.7.10.b.2 | 10 |
| L.1 | Deletes the requirement to shutdown the unit with less than four main turbine bypass valves capable of accepting steam flow and the MCP R LCO adjusted, since with the MCP R LCO adjusted, the analysis assumptions are met. | N/A | 3.7.10 Action 2.b) | 5 |
| | | | | |
| 3.7.8, Spent Fuel Storage Pool Water Level | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.7.4, Sealed Source Contamination | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.7.7, Area Temperature Monitoring | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.7.8, Structural Integrity of Class 1 Structures | | | | |

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

| | | | | |
|---|------|------|------|------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.7.9, Snubbers | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|--------------------------------------|---|---|--|-------------|
| 3.8.1, AC Sources - Operating | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for the following AC sources related Surveillance Requirements: offsite circuit transfer test; single load reject test; full load reject test; LOOP test; LOCA test; automatic trip bypass test; 24 hour run test; hot restart test; DG synchronization shutdown test; test mode override test; load block interval test; and LOCA/LOOP test. | 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 3.8.1.19, SR 3.8.1.13, SR 3.8.1.14, SR 3.8.1.15, SR 3.8.1.16, SR 3.8.1.17, SR 3.8.1.18 | 4.8.1.1.1.b, 4.8.1.2.d.2, 4.8.1.2.d.3, 4.8.1.2.d.4, 4.8.1.2.d.5, 4.8.1.2.d.6, 4.8.1.2.d.7, 4.8.1.2.d.8, 4.7.1.2.d.10, 4.8.1.2.d.11, 4.8.1.2.d.12 | 10 |
| L.1 | In the event of multiple concurrent AC Source inoperabilities, provides a maximum restoration time limit presented as an additional Completion Time of "10 days from discovery of failure to meet LCO 3.8.1.a or b" in ITS 3.8.1 Required Actions A.3, B.4, and C.4. In addition, in the event of multiple DG inoperabilities or multiple offsite circuit inoperabilities, a separate time period is allowed in ITS 1.3 for the subsequent repair. It essentially allows extension of the initial restoration time by 24 hours, not to exceed the actual time if the subsequent inoperability were tracked from its time of loss. | 3.8.1 Required Actions A.3, B.4, and C.4 | 3.8.1.1 Actions c, e, and f | 6 |

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

| | | | | |
|-----|--|--|--|---|
| L.2 | The CTS requires a DG start test for the remaining DGs to be performed within 48 hours prior to performing pre-planned maintenance or testing on the common DG. However, under normal conditions when a DG is inoperable, the CTS does not require this test if a DG is inoperable due to pre-planned maintenance or testing. The ITS will not include this extra requirement when the common DG is placed in an inoperable status for pre-planned maintenance or testing. In addition, the CTS requirement that precludes maintenance on offsite circuits or diesel generators while the common DG is inoperable is also deleted, since the ACTIONS of ITS 3.8.1 are adequate to ensure appropriate compensatory measures are taken in the event another required AC electrical power source is inoperable. | N/A | LCO 3.8.1.1.b footnote * Parts B and C | 4 |
| L.3 | Deletes the requirement to verify the cause of the inoperable DG does not impact the other DG. | N/A | 3.8.1.1 Actions b, c, d, f, and g footnote * | 4 |
| L.4 | CTS 3.8.1.1 Actions c and f require a verification by evaluation or test within 8 hours that the cause of a DG inoperability does not affect the remaining DGs. ITS 3.8.1 Required Actions C.3.1 and C.3.2 will continue to require this verification, but will allow 24 hours to perform the verification. | 3.8.1 Required Actions C.3.1 and C.3.2 | 3.8.1.1 Actions c and f | 6 |
| L.5 | CTS 3.8.1.1 Actions do not address both Division 2 DGs inoperable, therefore, the plant would default to CTS 3.0.3. ITS LCO 3.8.1 ACTION F will allow the unit Division 2 DG and required opposite unit DG to be inoperable for 2 hours before entry into ITS LCO 3.8.1, ACTION G (MODE 3 within 12 hours and MODE 4 within 36 hours) is required. | 3.8.1 ACTIONS F and G | 3.0.3 | 6 |
| L.6 | Not used. < INSERT L.6.a > | < INSERT L.6.b > | 4.8.1.1.1.b, 4.8.1.1.2.d | 3 |
| L.7 | Deletes STAGGERED TEST BASIS requirement from the CTS 4.8.1.1.2.a normal monthly DG Surveillances. | N/A | 4.8.1.1.2.a | 3 |
| L.8 | The Surveillance Frequency for CTS 4.8.1.1.2.a.3, the fuel oil transfer pump test, has been changed from "31 days" to "92 days." | SR 3.8.1.6 | 4.8.1.1.2.a.3 | 3 |

INSERT L.6.a (LCO 3.8.1 LaSalle)

The requirement to perform CTS 4.8.1.1.1.b and 4.8.1.1.2.d during shutdown has been included in the ITS. However, the proposed Surveillances include an allowance that portions or all of the Surveillance can be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced. Currently, credit is not allowed to be taken for performing one of these SRs if performed to demonstrate OPERABILITY after restoration of an offsite circuit or DG.

INSERT L.6.b (LCO 3.8.1 LaSalle)

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 3.8.1.13, SR 3.8.1.14, SR 3.8.1.16, SR 3.8.1.17, SR 3.8.1.18, SR 3.8.1.19

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| | | | | |
|------|--|---|--|---|
| L.9 | For the surveillances that automatically start the DG but do not tie it to a bus, the requirements have been changed to only require the minimum voltage and frequency limits to be met within the appropriate time limits. Once steady state conditions are reached, the minimum and maximum voltage and frequency limits must be maintained. In addition, the upper limit on the frequency will be 61.2 Hz, which is equivalent to a speed of 900 rpm +2%. Thus, for steady state conditions, the proposed SRs will be more restrictive. | SR 3.8.1.7, SR 3.8.1.12, SR 3.8.1.20 | 4.8.1.1.2.a.4, 4.8.1.1.2.d.5, 4.8.1.1.2.e | 3 |
| L.10 | The explicit requirement to periodically verify that each DG is aligned to provide standby power to the associated emergency buses is considered to be unnecessary for ensuring compliance with the applicable Technical Specification Operability requirements and is removed from the Technical Specifications. | LCO 3.8.1 | 4.8.1.1.2.a.6 | 3 |
| L.11 | CTS 4.8.1.1.2.b requires checking for and removing accumulated water from the DG day tanks every 31 days and "after each operation of the diesel where the period of operation was greater than or equal to 1 hour." ITS SR 3.8.1.5 only requires the check every 31 days. | SR 3.8.1.5 | 4.8.1.1.2.b | 3 |
| L.12 | The phrase "actual or", in reference to the loss of offsite power signal or the ECCS actuation signal, as applicable, has been added to CTS 4.8.1.1.2.d.4, 4.8.1.1.2.d.5, 4.8.1.1.2.d.6, 4.8.1.1.2.d.7, and 4.8.1.1.2.d.11 for verifying the proper response of the DG. This allows satisfactory loss of offsite power or ECCS actuations for other than Surveillance purposes to be used to fulfill the Surveillance Requirement. OPERABILITY is adequately demonstrated in either case since the DG cannot discriminate between "actual" or "simulated" signals. | SR 3.8.1.11, SR 3.8.1.12, SR 3.8.1.19, SR 3.8.1.13, SR 3.8.1.17 | 4.8.1.1.2.d.4, 4.8.1.1.2.d.5, 4.8.1.1.2.d.6, 4.8.1.1.2.d.7, 4.8.1.1.2.d.11 | 3 |
| L.13 | The manner in which the DG is started for CTS 4.8.1.1.2.d.8 (i.e., that the DG must be within the proper voltage and frequency within a certain time limit after the start signal) has not been included in the ITS. | N/A | 4.8.1.1.2.d.8 | 3 |
| L.14 | Deletes CTS 4.8.1.1.2.d.13, which verifies the DG lockout features prevent DG operation only when required. | N/A | 4.8.1.1.2.d.13 | 3 |
| L.15 | Deletes explicit post maintenance Surveillance Requirements as required by CTS 4.8.1.1.2.e (i.e., after any modifications which could affect DG interdependence). | N/A | 4.8.1.1.2.e | 3 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| | | | | |
|------|---|------------------------------------|-------------|-----|
| L.16 | The requirement to conduct CTS 4.8.1.1.2.e (to simultaneously start all three DGs) when the reactor is shutdown has not been included in the ITS. | N/A | 4.8.1.1.2.e | 3 |
| L.17 | CTS 3.0.5 provides an allowance that required feature(s) supported by an inoperable AC source may be considered OPERABLE provided the redundant required feature(s) are OPERABLE. However, if these requirements are not satisfied, CTS 3.0.5 requires the unit to be placed in Startup within 6 hours, Hot Shutdown within following 6 hours, and in Cold Shutdown within the subsequent 24 hours. In lieu of a shutdown, ITS LCO 3.8.1 ACTIONS A, B, C, and D include requirements to declare required feature(s) supported by the inoperable AC source inoperable when the redundant required feature(s) are inoperable. ITS 3.8.1 ACTION A (one required offsite circuit inoperable) allows 24 hours before declaring the equipment supported by the inoperable AC source inoperable, ITS 3.8.1 ACTIONS B and C (one required DG inoperable) allow 4 hours before the affected supported equipment must be declared inoperable, and ITS 3.8.1 ACTION D (two required offsite circuits inoperable) allows 12 hours before the affected supported equipment must be declared inoperable. By declaring the affected supported equipment inoperable, and as a result, taking the Technical Specifications actions of the affected supported equipment, unit operation is maintained within the bounds of the Technical Specifications and approved ACTIONS. | 3.8.1 ACTIONS A, B, C, and D | 3.0.5 | 6 |
| L.18 | Not used. | N/A | N/A | N/A |
| L.19 | If an offsite circuit is inoperable only due to its inability to provide power to the Division 3 electrical power distribution subsystem, CTS 3.8.1.1 Action a would require a unit shutdown if the offsite circuit is not restored to OPERABLE status within 72 hours. ITS 3.8.1 provides an Applicability Note which, in the event the HPCS System is inoperable, allows the associated offsite circuit to not be required to be OPERABLE. Thus, at the end of the current 72 hour restoration time, the ITS Note would allow the HPCS System to be declared inoperable, and the ACTIONS in ITS 3.5.1 would be taken for an inoperable HPCS System. The ACTIONS of ITS 3.5.1 allow 14 days to restore the HPCS System to OPERABLE status. The overall effect of this change is to allow an additional 14 days to restore the circuit to OPERABLE status, since this is the only way to restore the HPCS System to OPERABLE status under this condition. | 3.8.1 Applicability Note 1 | N/A | 1 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| | | | | |
|--|--|----------------------|------------------------------|---|
| L.20 | The CTS requires verification that the interval between each load block is within $\pm 10\%$ of its design interval for Division 1 and 2 Dgs. The SR is proposed to be changed to delete the upper 10% limit, such that the interval between each load block is only required to be $\geq 90\%$ of the design load interval. | 4.8.1.1.12.d.2 | SR 3.8.1.18 | 3 |
| 3.8.2, AC Sources - Shutdown | | | | |
| L.1 | In an effort to consistently address the concern of the only required DG and the only required offsite circuit connected (presenting a significant risk of a single fault resulting in a station blackout) and to avoid potential conflicting Technical Specifications, the Surveillances that would require the DG to be connected to the offsite source are excepted from performance requirements. The exception does not take exception to the requirement for the DG to be capable of performing the particular function; just to the requirement to demonstrate it while that source of power is being relied on to support meeting the LCO. | SR 3.8.2.1 Note 1 | 4.8.1.2 | 3 |
| L.2 | CTS 4.8.1.2, which provides the Surveillance Requirements for the AC Sources while in Modes 4 and 5 and during handling of irradiated fuel in the secondary containment, requires the Surveillances of CTS 4.8.1.1.2 to be performed. Two of the Surveillances of CTS 4.8.1.1.2 are the DG start on an ECCS initiation signal and the DG start and load on an ECCS initiation signal concurrent with a loss of offsite power signal. Note 2 to SR 3.8.2.1 will exempt these two Surveillances when the associated ECCS subsystem(s) are not required to be Operable. | SR 3.8.2.1 Note 2 | 4.8.1.2 | 3 |
| L.3 | An alternative is proposed in the ITS to suspend operations if an AC Source is inoperable and movement of irradiated fuel assemblies, CORE ALTERATIONS, or OPDRVs are being conducted. The alternative is to declare the affected feature(s) inoperable and continue to conduct operations (e.g., OPDRVs), if the affected feature(s) ACTIONS allow. | 3.8.1.2 Action a | 3.8.2 Required Action A.1 | 5 |
| 3.8.3, Diesel Fuel Oil and Starting Air | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| | | | | |
|--------------------------------------|--|--|-------------------------------------|----|
| L.1 | The diesel fuel oil and starting air parameters, while supporting DG OPERABILITY, contain substantial margin in addition to the limits which would be absolutely necessary for DG OPERABILITY. Therefore, certain levels of degradation in these parameters are justified to extend the allowances for restoration (presented as ITS 3.8.3 ACTIONS A, B, C, D, E and ACTIONS Note). During the extended restoration periods for these parameters, the DG would still be capable of performing its intended function. ACTION A allows 48 hours to restore fuel oil level in the storage tanks prior to declaring the DG inoperable, provided fuel oil level is sufficient for 6 days supply. ACTION B allows 7 days to restore stored fuel oil total particulates to within limits prior to declaring the DG inoperable. ACTION C allows 30 days to restore other stored fuel oil properties to within limits. ACTION D allows 48 hours to restore starting air pressure prior to declaring the DG inoperable, provided a 1 start capacity remains. ACTION E is provided to declare the DG inoperable if previous ACTIONS are not met. During the proposed extended periods for restoration of these parameters, the DG would still be capable of performing its intended function. | 3.8.3 ACTIONS Note, 3.8.3 ACTIONS A, B, C, D, and E | 3.8.1.1 Actions, 3.8.1.2 Actions | 6 |
| L.2 | Deletes STAGGERED TEST BASIS requirement from the CTS 4.8.1.1.2.a normal monthly fuel oil storage tank level and the starting air pressure Surveillances. | N/A | 4.8.1.1.2.a | 3 |
| | | | | |
| 3.8.4, DC Sources - Operating | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for the following Surveillances: Visual inspection of battery for physical damage or abnormal deterioration; verification that cell-to-cell and terminal connections are free of corrosion; inter-cell and terminal connection resistance checks; battery charger test; and battery service test. | SR 3.8.4.3, SR 3.8.4.4, SR 3.8.4.5, SR 3.8.4.6, SR 3.8.4.7 | 4.8.2.3.2.c, 4.8.2.3.2.d | 10 |
| L.1 | Removes from CTS 4.8.2.3.2.b the requirement to verify, within 7 days after a battery discharge or overcharge, that there is no visible corrosion at either terminals or connectors, or that connection resistance is $< 150 \times 10^{-6} \text{ohm}$. | N/A | 4.8.2.3.2.b | 3 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
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| | | | | |
|-----|---|----------------------|--------------------------------|-----|
| L.2 | CTS 4.8.2.3.2.c.2 and 4.7.3.d.3.b) require the cell-to-cell and terminal connections to be "clean, tight." The confirmation that the connection is "tight" is typically performed by application of a torque, which results in unnecessary stress being applied to the bolted connection. If the connection satisfies the resistance requirements of ITS SR 3.8.4.5, it can be assumed to be sufficiently "tight." The "clean" requirement has been deleted since it is redundant to the "free of corrosion" requirement. In addition, the requirement to verify that connections are "clean" and "tight" is only applicable to nickel cadmium batteries. The DC electrical power subsystem batteries are lead calcium batteries. | SR 3.8.4.5 | 4.8.2.3.2.c.2, 4.7.3.d.3.b) | 3 |
| L.3 | Not used. | N/A | N/A | N/A |
| L.4 | CTS 4.8.2.3.2.e allows a performance discharge test to substitute for the service test once every 60 months, whereas ITS SR 3.8.4.7 Note 1 will only allow a modified performance discharge test to be substituted for the service test. In addition, the modified performance discharge test will be allowed to substitute for the service test at any time, instead of just one every 60 months. | SR 3.8.4.7 Note 1 | 4.8.2.3.2.e | 3 |
| L.5 | Adds an allowance to perform a modified performance discharge test in lieu of a performance discharge test. | SR 3.8.4.8 | 4.8.2.3.2.e, 4.8.2.3.2.f | 3 |
| L.6 | CTS 4.8.2.3.2.f requires an annual battery performance discharge test when the battery has reached 85% of its service life. A battery can be at 85% or greater of expected life, and still be within the required capacity to meet OPERABILITY requirements. In this event, a Frequency less restrictive than the annual Frequency is justified. ITS SR 3.8.4.8 will now be required to be performed every 24 months when a battery has reached 85% of expected life with battery capacity \geq 100% of manufacturer's rating to be consistent with NUREG-1434, Rev. 1. | SR 3.8.4.8 | 4.8.2.3.2.f | 3 |
| L.7 | Reduces the test duration from 8 hours to 4 hours for the performance of a battery charger capacity test to verify the charger will supply a load equal to the manufacturer's rating. | SR 3.8.4.6 | 4.8.2.3.2.c.4 | 3 |
| | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| 3.8.5, DC Sources - Shutdown | | | | |
|--------------------------------|---|---------------------------------|------------------------------|---|
| L.1 | Three of the DC sources Surveillances required to be performed by CTS 4.8.2.4 (CTS 4.8.2.3.2.d, 4.8.2.3.2.e, and 4.8.2.3.2.f) involve tests that would cause the only required OPERABLE unit 125V battery to be rendered inoperable. This condition presents a significant risk if an event were to occur during the test. In an effort to consistently address this concern, ITS SR 3.8.5.1 has a Note that excludes performance requirements of Surveillances that would require the required OPERABLE unit 125V battery(s) to be rendered inoperable. This allowance does not take exception to the requirement for the battery to be capable of performing the particular function - just to the requirement to demonstrate that capability while that source of power is being relied on to support meeting the LCO. | SR 3.8.5.1 Note | N/A | 3 |
| L.2 | This time allowed to re-energize the associated 125V DC electrical power distribution subsystem using the OPERABLE opposite unit DC electrical power subsystem has been extended from immediately to 1 hour. <i>(ins) (DC)</i> | 3.8.5 Required Action A.1 | 3.8.2.4 Action c | 6 |
| L.3 | An alternative is proposed in the ITS to suspend operations if an AC Source is inoperable and movement of irradiated fuel assemblies, CORE ALTERATIONS, or OPDRVs are being conducted. The alternative is to declare the affected feature(s) inoperable and continue to conduct operations (e.g., OPDRVs), if the affected feature(s) ACTIONS allow. | 3.8.2.4 Action a | 3.8.5 Required Action B.1 | 5 |
| 3.8.6, Battery Cell Parameters | | | | |
| L.1 | Removes the requirement to verify that the average electrolyte temperature of selected battery cells is above 60°F within 7 days after a battery discharge or overcharge. | N/A | 4.8.2.3.2.b | 3 |
| L.2 | Adds footnote (a) to the electrolyte level limits for Table 3.8.6-1, Category A and B limits, allowing for a temporary electrolyte level increase during and following an equalize charge. | Table 3.8.6-1 footnote (a) | Table 4.8.2.3.2- 1 | 1 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| | | | | |
|-----|---|---|---|------|
| L.3 | Applies to all Category limits the allowance in CTS Table for utilizing charging current in lieu of specific gravity, whereas currently, this allowance is not provided for Category B limits or part of the Category B allowable values. In addition, the allowance is also applied to the specific gravity requirements for the 250 VDC battery. | Table 3.8.6-1 footnote (c) | Table 4.8.2.3.2-1 footnote (b) | 1 |
| L.4 | The time specified in CTS Table 4.8.2.3.2-1 footnotes (1) and (2) to restore Category A and B battery cell parameters to within limits has been extended from the next 7 days and 7 days, respectively, to 31 days in ITS 3.8.6 Required Action A.3. In addition, periodic verification that the Category C limits are not being exceeded must be performed. ITS 3.8.6 Required Action A.2 requires this verification every 7 days. | 3.8.6 Required Actions A.2 and A.3 | Table 4.8.2.3.2-1 footnotes (1) and (2) | 6 |
| L.5 | Currently, if a 250 VDC battery cell is not within the limits, the RCIC System is required to be declared inoperable and the ACTIONS of CTS 3.7.3 taken. A 31 day Completion Time for restoring a 250 VDC battery cell has been provided (ITS 3.8.6 Required Action A.3). To support this new time, two additional requirements have been added. ITS 3.8.6 Required Action A.1 has been provided to verify the 250 VDC battery pilot cell electrolyte level and float voltage are within allowable values (Category C limits) within 1 hour when Category A or B parameters are not within limits. ITS 3.8.6 Required Action A.2 has been provided to verify 250 VDC battery cell parameters for all the cells are within Category C limits within 24 hours when Category A or B parameters are not within limits. If Category C limits are not met or the Category A and B limits are not restored within 31 days, ITS 3.8.6 ACTION B requires the 250 VDC electrical power subsystem to be immediately declared inoperable and the appropriate ACTIONS of ITS 3.8.4 be taken. | 3.8.6 ACTION A | 3.7.3 Action b | 6 |
| L.6 | The current total voltage limit for the 250 VDC battery (greater than or equal to 250V under float charge) has been changed to an individual cell voltage limit (Category A and B limit is 2.13 V per cell and the new Category C limit is 2.07 V per cell). In addition, CTS 4.7.3.d.2.a) requires that the voltage decrease from the value observed during the original test not exceed 12 volts and CTS 4.7.3.d.2.b) requires that the specific gravity decrease from the value observed during the previous test not exceed 0.05. These requirements are not maintained in the ITS. | Table 3.8.6-1 Category A, B, and C limits | 4.7.3.d.2.a), 4.7.3.d.2.b) | 1, 3 |

decreased

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
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| | | | | |
|---|---|-----------------------------|---------------------------------------|---|
| L.7 | The 125 VDC battery cell electrolyte temperature limit has been slightly increased to allow electrolyte temperature to be greater than or equal to 60°F, in lieu of the current requirement that the temperature be greater than 60°F. | SR 3.8.6.3 | 4.8.2.3.2.b.3 | 1 |
| 3.8.7, Distribution Systems - Operating | | | | |
| L.1 | CTS 3.8.2.1 Action a allows 8 hours to restore one inoperable AC subsystem and CTS 3.8.2.3 Action a allows 2 hours to restore one inoperable DC subsystem. No time is provided if buses are inoperable in Division 1 and 2 AC subsystems concurrently or in Division 1 and 2 DC subsystems concurrently, requiring entry into CTS 3.0.3. ITS 3.8.7 ACTIONS A and B allow one "or more" AC and DC electrical power distribution subsystems to be concurrently inoperable, without requiring an ITS 3.0.3 entry; either 8 hours or 2 hours (8 hours for AC and 2 hours for DC) will be allowed to restore the inoperabilities. However, ITS 3.8.7 ACTION G is also added to require that if two or more electrical power distribution subsystems are inoperable that, in combination, result in a loss of function, then ITS 3.0.3 must be entered immediately. | 3.8.7 ACTIONS A and B | 3.8.2.1 Action a, 3.8.2.3 Action a | 6 |
| L.2 | CTS 3.8.2.1.d requires the opposite unit Division 1 4.16 kV bus and cross-tie breaker be OPERABLE. The opposite unit's Division 1 4.16 kV bus does not provide power to any opposite unit equipment required by the given unit; only the opposite unit's Division 2 AC buses provide power to equipment required by the given unit. The purpose of CTS 3.8.2.1.d is to support the alternate offsite circuit pathway to the given unit. As such, this requirement has been moved to ITS 3.8.1 (See DOC A.2 for ITS 3.8.7). CTS 3.8.2.1 Action d requires that if both the opposite unit's Division 1 and 2 buses are inoperable, one of them must be restored within 8 hours or a shutdown is required. This requirement is overly restrictive and has not been included in the ITS. | N/A | 3.8.2.1 Action d | 4 |
| 3.8.8, Distribution Systems - Shutdown | | | | |

Rev D

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

or DC distribution system

| | | | | |
|---|--|---|---------------------------------|------|
| L.1 | An alternative is proposed in the ITS to suspend operations if an AC Source ^{bus} is inoperable and movement of irradiated fuel assemblies, CORE ALTERATIONS, or OPDRVs are being conducted. The alternative is to declare the affected feature(s) inoperable and continue to conduct operations (e.g., OPDRVs), if the affected feature(s) ACTIONS allow. | 3.8.2.2 Action a, 3.8.2.4 Action a | 3.8.8 Required Action A.1 | 5 |
| | | | | |
| Current Specification 3/4.8.3.1, AC Circuits Inside Primary Containment | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.8.3.2, Primary Containment Penetration Conductor Overcurrent Protective Devices | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.8.3.3, Motor Operated Valves Thermal Overload Protection | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|---|--|---|--|-------------|
| 3.9.1, Refueling Equipment Interlocks | | | | |
| L.1 | Adds actions to allow a control rod block to be inserted and to verify all control rods inserted are fully inserted in lieu of suspending in-vessel fuel movement when a required Refuel position equipment interlock is inoperable. | 3.9.1 Required Actions A.2.1 and A.2.2 | N/A | 4 |
| L.2 | Deletes the requirement to perform the Surveillance Requirement "within 24 hours prior to the start of" use of the component, since the normal 7 day periodic Surveillance Frequency of CTS 4.9.1.2 (proposed SR 3.9.1.1) for the CHANNEL FUNCTIONAL TEST of the reactor mode switch refuel position interlocks provides adequate assurance of OPERABILITY. | N/A | 4.9.1.2 | 3 |
| L.3 | Deletes explicit requirement for the affected reactor mode switch refuel position interlocks to be demonstrated OPERABLE by performance of a CHANNEL FUNCTIONAL TEST before resuming control rod withdrawal or CORE ALTERATIONS following repair, maintenance, or replacement of any component that could affect the refuel position interlock, since SR 3.0.1 requires the appropriate SRs to be performed to demonstrate the OPERABILITY of the affected components. | N/A | 4.9.1.3 | 3 |
| | | | | |
| 3.9.2, Refuel Position One-Rod-Out Interlock | | | | |
| L.1 | Deletes the requirement to "lock" the mode switch in Shutdown. | N/A | LCO 3.9.1, 3.9.1 Action a, 4.9.1.1 | 8 |
| L.2 | Revises actions, with the one-rod-out interlock inoperable, to immediately suspend control rod withdrawal and initiate action to insert all insertable control rods in core cells containing one or more fuel assemblies. CTS requires CORE ALTERATIONS to be suspended and the reactor mode switch to be locked in Shutdown or Refuel. | 3.9.2 Required Actions A.1 and A.2 | 3.9.1 Actions a and b | 5 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|------------------------------------|--|--------------------------|------------------------|-------------|
| L.3 | Deletes the requirement to perform CTS 4.9.1.1 "within 2 hours before" and CTS 4.9.1.2 "within 24 hours prior to the start of" use of the component, since the normal 12 hour periodic Surveillance Frequency to verify the reactor mode switch is locked in the refuel position and the normal 7 day periodic Surveillance Frequency for the CHANNEL FUNCTIONAL TEST of the one-rod-out interlock provide adequate assurance of OPERABILITY. | N/A | 4.9.1.1, 4.9.1.2 | 3 |
| L.4 | Provides an allowance to enter the LCOs Applicability for a short time (1 hour) to provide adequate time to perform the required Surveillance. | SR 3.9.2.2 Note | N/A | 7 |
| L.5 | Deletes explicit requirement for the one-rod-out interlock to be demonstrated OPERABLE by performance of a CHANNEL FUNCTIONAL TEST before resuming control rod withdrawal or CORE ALTERATIONS following repair, maintenance, or replacement of any component that could affect the one-rod-out interlock, since SR 3.0.1 requires the appropriate SRs to be performed to demonstrate the OPERABILITY of the affected components. | N/A | 4.9.1.3 | 3 |
| | | | | |
| 3.9.3, Control Rod Position | | | | |
| L.1 | Revises the Applicability that all control rods be inserted (clarified to require "fully" inserted) in OPERATIONAL CONDITION 5 during CORE ALTERATIONS to "when loading fuel assemblies into the core," since the intent is to establish the requirement that all control rods are inserted only in those situations that could add positive reactivity but are not covered by other Technical Specifications. In addition, the Actions have been revised consistent with the change in Applicability. | 3.9.3, 3.9.3 ACTION A | 3.9.3, 3.9.3 Action | 2, 4 |
| L.2 | Deletes the requirement to perform CTS 4.9.3 "within 2 hours prior to the start of CORE ALTERATIONS," since the normal 12 hour periodic Surveillance Frequency to verify the control rods are inserted provides adequate assurance of OPERABILITY. | N/A | 4.9.3.a, 4.9.3.a.1 | 3 |
| | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|---|--|--------------------------|--|-------------|
| 3.9.4, Control Rod Position Indication | | | | |
| L.1 | Omits the position indication requirement in that no position indication is proposed to be required other than the full-in position indication. The OPERABILITY of the control rod "full-in" position indication for each control rod (whether the control rod is inserted or withdrawn) is proposed to be required to support OPERABILITY of the refueling interlocks and OPERABILITY of the one-rod-out interlock. In addition, the Surveillance Requirements have also been modified to be consistent with this concept (the full-in indicator only must be OPERABLE). The new Surveillance requires that each time a control rod is withdrawn from the full-in position, the full-in indication is indicating correctly (i.e., it is not indicating full-in when a control rod is withdrawn). The current requirements to verify the position of the control rod every 24 hours, that the control rod position changes during exercise tests, that the full-out indicator functions during rod coupling checks, and the full-in position indication checks prior to each reactor startup and each time a control rod is fully inserted, have been deleted. | LCO 3.9.4, SR 3.9.4.1 | LCO 3.1.3.7, 3.1.3.7 Action b, 4.1.3.7.a, 4.1.3.7.b, 4.1.3.7.c, 4.1.3.7.d | 1, 3 |
| | | | | |
| 3.9.5, Control Rod OPERABILITY - Refueling | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.9.6, RPV Water Level - Irradiated Fuel | | | | |
| L.1 | Deletes the requirement to perform CTS 4.9.8 "within 2 hours prior to the start of" handling fuel assemblies, since the normal 24 hour periodic Surveillance Frequency for verification of reactor vessel water level provides adequate assurance of OPERABILITY. | N/A | 4.9.8 | 3 |
| | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|--|--|-------------|-------------|-------------|
| 3.9.7, RPV Water Level - New Fuel or Control Rods | | | | |
| L.1 | Splits CTS 3.9.8, which provides reactor vessel water level requirements during movement of fuel assemblies and handling of control rods within the reactor pressure vessel (RPV), into two Specifications. ITS 3.9.7 now provides the requirements for movement of new fuel assemblies and control rods within the RPV when irradiated fuel assemblies are seated within the RPV, with water level determined from the top of irradiated fuel assemblies seated within the RPV rather than from the top of the RPV flange as is in CTS 3.9.8. | LCO 3.9.7 | LCO 3.9.8 | 1 |
| L.2 | Deletes the requirement to perform CTS 4.9.8 "within 2 hours prior to the start of" handling fuel assemblies or control rods, since the normal 24 hour periodic Surveillance Frequency for verification of reactor vessel water level provides adequate assurance of OPERABILITY. | N/A | 4.9.8 | 3 |
| | | | | |
| 3.9.8, Residual Heat Removal - High Water Level | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.9.4, Decay Time | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.9.5, Communications | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|--|---------|-------------|-------------|-------------|
| Current Specification 3/4.9.6, Crane and Hoist | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.9.7, Crane Travel | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|--|--|---|---|-------------|
| 3.10.1, Reactor Mode Switch Interlock Testing | | | | |
| L.1 | ITS allows reactor mode switch interlock testing to be conducted in MODES 3, 4, and 5 if control rods are not fully inserted, provided these non-fully inserted control rods are in cells containing no fuel assemblies, in lieu of current requirement that all control rods remain fully inserted. An additional change is proposed to include Refuel as an allowable reactor mode switch position for these interlock tests in Hot Shutdown and Cold Shutdown conditions. | LCO 3.10.1 | Table 1.2 footnote #, 3.9.1 footnote ## | 1 |
| | | | | |
| 3.10.2, Single Control Rod Withdrawal - Hot Shutdown | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.10.3, Single Control Rod Withdrawal - Cold Shutdown | | | | |
| L.1 | Deletes the requirement to "lock" the reactor mode switch in Refuel and the explicit requirement for the reactor mode switch to be OPERABLE. | N/A | LCO 3.9.10.1.a, 4.9.10.1.a | 1, 8 |
| L.2 | For removal of a control rod drive in Cold Shutdown, alternative requirements have been provided in ITS 3.10.3 in place of the SHUTDOWN MARGIN and control rod five-by-five array of disarming requirements of. The alternatives require all MODE 5 RPS Functions to be OPERABLE, MODE 5 requirements for LCO 3.3.8.2, RPS Electric Power Monitoring, and LCO 3.9.5, Control Rod OPERABILITY — Refueling, to be made applicable. In addition, an alternative requirement has been provided in place of the one-rod-out interlock requirement. The alternative will require a control rod withdrawal block to be inserted. New Surveillances have also been added to perform the applicable SRs for the required LCOs if RPS Functions, and control rod OPERABILITY requirements are chosen, and to verify every 24 hours that a control rod withdrawal block is inserted if the block is the chosen requirement. | LCO 3.10.3.b.2, LCO 3.10.3.c.1, SR 3.10.3.1, SR 3.10.3.4 | N/A | 1 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|---|---|-------------|---------------------------------|-------------|
| L.3 | Deletes the requirement to perform CTS 4.9.10.1 "Within 4 hours prior to the start of removal of a control rod and/or the associated control rod drive mechanism from the core and/or reactor pressure vessel," since the normal 24 hour periodic Surveillance Frequency to verify the requirements of the LCO are met provides adequate assurance that the LCO requirements are satisfied. | N/A | 4.9.10.1 | 3 |
| | | | | |
| 3.10.4, Single Control Rod Drive Removal - Refueling | | | | |
| L.1 | Deletes the requirement to "lock" the reactor mode switch in Shutdown or Refuel and the explicit requirement for the reactor mode switch to be OPERABLE. | N/A | LCO 3.9.10.1.a, 4.9.10.1.a | 1, 8 |
| L.2 | Deletes the requirement to perform CTS 4.9.10.1 "Within 4 hours prior to the start of removal of a control rod and/or the associated control rod drive mechanism from the core and/or reactor pressure vessel," since the normal 24 hour periodic Surveillance Frequency to verify the requirements of the LCO are met provides adequate assurance that the LCO requirements are satisfied. | N/A | 4.9.10.1 | 3 |
| | | | | |
| 3.10.5, Multiple Control Rod Withdrawal - Refueling | | | | |
| L.1 | The requirement "lock" the reactor mode switch in Shutdown or Refuel and the explicit requirement for the reactor mode switch to be OPERABLE | N/A | LCO 3.9.10.2.a, 4.9.10.2.1.a | 1, 8 |
| L.2 | Deletes the requirement to perform CTS 4.9.10.2.1 "Within 4 hours prior to the start of removal of control rods and/or control rod drive mechanisms from the core and/or reactor pressure vessel," since the normal 24 hour periodic Surveillance Frequency to verify the requirements of the LCO are met provides adequate assurance that the LCO requirements are satisfied. | N/A | 4.9.10.2.1 | 3 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|--|--|---|-------------|-------------|
| L.3 | Deletes the explicit requirement for the performance of a functional test of the "one-rod-out Refuel position interlock" following replacement of all control rods and/or control rod drive mechanisms removed in accordance with CTS 3.9.10.2, if the function had been bypassed, since after restoration of a component that caused a required SR to be failed, SR 3.0.1 requires the appropriate SRs to be performed to demonstrate the OPERABILITY of the affected components. | N/A | 4.9.10.2.2 | 3 |
| | | | | |
| 3.10.6, Control Rod Testing - Operating | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.10.7, SDM Test - Refueling | | | | |
| L.1 | Modifies the Surveillance Frequency to require the RWM verification to be performed in accordance with the applicable Surveillance requirements of the RWM Specification, and the CORE ALTERATION verification every 12 hours, instead of once within 30 minutes prior to the start of the SDM test | SR 3.10.7.2, SR 3.10.7.3, SR 3.10.7.4 | 4.10.3 | 3 |
| | | | | |
| Current Specification 3/4.10.1, Primary Containment Integrity | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.10.5, Oxygen Concentration | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|---|---------|-------------|-------------|----------------|
| Current Specification 3/4.10.6, Training Startups | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.10.8, Suppression Chamber Water Temperature (Unit 1 only) | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 4.0 - DESIGN FEATURES**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|----------|---------|-------------|-------------|----------------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|---------------------------------------|---|-------------|-------------|-------------|
| 5.1, Responsibility | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 5.2, Organization | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 5.3, Unit Staff Qualifications | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 5.4, Procedures | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 5.5, Programs and Manuals | | | | |
| LD.1 | Extends the Frequency from 18 to 24 months for the integrated leak test requirements for each system outside containment that could contain highly radioactive fluids during a serious transient or accident. | 5.5.2.b | 6.2.F.1.b | 10 |
| LD.2 | Extends the Frequency from 18 to 24 months for the Surveillances on the SGT System in place charcoal adsorbers, HEPA filters, and heaters, which ensure the SGT System can perform its safety function. | 5.5.8 | 6.2.F.8 | 10 |

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

| | | | | |
|---|--|-----------------------|---------------------------------|------|
| LD.3 | Extends the Frequency from 18 to 24 months for the Surveillances on the CRAF System in place charcoal adsorbers, HEPA filters, and heaters, which ensure the CRAF System can perform its safety function. | 5.5.8 | 6.2.F.8 | 10 |
| L.1 | Relaxes the requirement that sampling and verification that new fuel oil meets ASTM standards for particulate contamination prior to addition to the fuel oil storage tanks by allowing the particulate contaminant analyses of the stored fuel be performed every 31 days after the addition of any new fuel oil to the storage tanks. Deletes the requirement to perform sampling of stored fuel oil every 92 days to verify "kinematic viscosity" within ASTM limits. Replaces the requirement to perform sampling of stored fuel oil every 92 days to verify "water and sediment" within ASTM limits with a clear and bright "appearance" test. Modifies the acceptance criterion for the particulate contamination limit from < 10 mg/liter less <u>than or equal to</u> 10 mg/liter. \leq | 5.5.10.b, 5.5.10.c | 4.8.1.1.2.c.2, 4.8.1.1.2.c.1 | 3 |
| 5.6, Reporting Requirements | | | | |
| L.1 | Relaxes the requirement for submitting the Occupational Radiation Exposure Report and the requirement for submitting the Annual Radiological Environmental Operating Report from prior to March 1 and May 1 of each year, respectively to by April 30 and May 15 of each year, respectively | 5.6.1, 5.6.2 | 6.6.A.2, 6.6.A.3 | 6 |
| 5.7, High Radiation Areas | | | | |
| NONE | NONE | NONE | NONE | NONE |
| Current Specification 6.1.E/F, Training | | | | |
| NONE | NONE | NONE | NONE | NONE |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS**

| Current Specification 6.2.B, Radiation Protection Program | | | | |
|--|--|------|------------------|------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 6.3, Reportable Event Action | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 6.4, Safety Limit Violation | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 6.5, Plant Operating Records | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 6.7, Process Control Program | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 6.9, Major Changes to Radioactive Waste Treatment System | | | | |
| L.1 | Relaxes the reporting requirement for the submittal of major changes to the radioactive waste treatment system in the Monthly Operating Report to requiring the submittal in the Radioactive Release Report. | N/A | 6.9.1.a, 6.6.A.5 | 9 |
| | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS**

CHANGE TYPE

1. Relaxation of the LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement
10. Relaxation of Surveillance Frequency from 18 months to 24 months

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
CHAPTER 1.0 - USE AND APPLICATION**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|--------------------------|-------------------------------------|---|----------|--|----------------|
| 1.0-LA.1 | N/A | Not used. | N/A | N/A | N/A |
| 1.0-LA.2 | 1.32.a, b, c, f and 1.39.b, e | Moves items a, b, c, and f from the PRIMARY CONTAINMENT INTEGRITY definition to the ITS 3.6.1.1 Bases and items b and e from the CTS SECONDARY CONTAINMENT INTEGRITY definition to the ITS 3.6.4.1 Bases. | Bases | Bases Control Process in ITS Chapter 5.0 | 1 |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
CHAPTER 2.0 - SAFETY LIMITS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|--------------------------|----------------|---------|----------|---------------------------|----------------|
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.0 - LCO AND SR APPLICABILITY**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|--------------------------|----------------|---------|----------|---------------------------|----------------|
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|---------------------------------------|---|---|----------|--|----------------|
| 3.1.1, SHUTDOWN MARGIN | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.1.2, Reactivity Anomalies | | | | | |
| 3.1.2-LA.1 | 3.1.2 Action a | The requirement to perform an analysis to determine and explain the cause of the reactivity difference. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.1.3, Control Rod OPERABILITY | | | | | |
| 3.1.3-LA.1 | 3.1.3.1 Actions a.1.b), b.1.b), and b.2.a), 3.1.3.6 Action a.1.b), 3.1.3.7 Action a.3.b) | The details of the recommended procedures for disarming control rod drives. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.1.3-LA.2 | 3.1.3.7 Actions a.1 and a.2 | Details of methods for determining the position of a control rod. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|--|----------------|---|----------|--|----------------|
| 3.1.4, Control Rod Scram Times | | | | | |
| 3.1.4-LA.1 | 4.1.3.2.c | ITS SR 3.1.4.2 will test a "representative sample" of control rods each 120 days of power operation instead of the CTS requirement of "10% of the control rods on a rotating basis." The details of what constitutes a representative sample are relocated. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.1.5, Control Rod Scram Accumulators | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.1.6, Rod Pattern Control | | | | | |
| NONE | NONE | NONE | NONE | NONE | |
| | | | | | |
| 3.1.7, Standby Liquid Control System | | | | | |
| 3.1.7-LA.1 | 4.1.5.a.2 | The detail of the method for performance of the temperature verification surveillance (verifying temperature "on the local indicator"). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.1.7-LA.2 | 4.1.5.c.1 | The details of the method for performing the Surveillance to verify flow through the SLC subsystem into the reactor pressure vessel (initiating an explosive valve and the requirements on the replacement charges for explosive valve). | Bases | Bases Control Program in ITS Chapter 5 | 3 |

(by pumping from the storage tank to the test tank and then draining and flushing the piping with demineralized water)

(by pumping demineralized water into the reactor vessel)

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|--|------------------------------|--|-------------|--|-------------|
| 3.1.7-LA.3 | 4.1.5.c.1, 4.1.5.c.4 | The details of the method for performing: 1) The Surveillance to verify flow through the SLC subsystem into the reactor pressure vessel, and 2) The Surveillance to demonstrate all piping between the SLC storage tank and the pump suction is unblocked. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.1.7-LA.4 | 4.1.5.c.3 | The testing requirements for SLC System relief valve setting verification. | IST Program | IST Program in ITS Chapter 5 | 3 |
| 3.1.7-LA.5 | Figure 3.1.5-2 | The contained tank volumes associated with the SLC storage tank low level and high level alarms. | UFSAR | 10 CFR 50.59 | 1 |
| 3.1.8, SDV Vent and Drain Valves | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| Current Specification 3/4.1.3.8, Control Rod Drive Housing Support | | | | | |
| None, E.1 NONE | 3/4.1.3.8 NONE | Requirement for Control Rod Drive Housing Support to be in place NONE | NONE | NONE | NONE |
| Current Specification 3/4.1.6, Economic Generation Control System | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |

NRC

This is in L Table, not being relocated i.e., this is a duplicate entry.

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.2 - POWER DISTRIBUTION LIMITS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|--|-----------------|---|----------|---|----------------|
| 3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE | | | | | |
| 3.2.1-LA.1 | 3.2.1 Action | The requirement in the CTS 3.2.1 ACTION to "initiate corrective action within 15 minutes" to restore the limit is relocated in the form of a discussion that "prompt action" should be taken to restore the parameter to within the limits. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.2.2, MINIMUM CRITICAL POWER RATIO | | | | | |
| 3.2.2-LA.1 | 3.2.3 Action | The requirement in the CTS 3.2.3 ACTION to "initiate corrective action within 15 minutes" to restore the limit is relocated in the form of a discussion that "prompt action" should be taken to restore the parameter to within the limits. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.2.2-LA.2 | 4.2.3.2 | The detail of the method for comparing scram testing results and determining the MCPR limit is relocated in the form of a discussion. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.2.2-LA.3 | 4.2.3.2 | The requirement that, prior to initial scram time testing for an operating cycle, the MCPR operating limit be based on the Technical Specification Scram Speed (TSSS). | COLR | COLR change control process described in Chapter 5 of the ITS | 3 |
| | | | | | |
| 3.2.3, LINEAR HEAT GENERATION RATE | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.2 - POWER DISTRIBUTION LIMITS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|--------------------------|-----------------|---|----------|--|----------------|
| 3.2.3-LA.1 | 3.2.4 Action | The requirement in the CTS 3.2.4 ACTION to "initiate corrective action within 15 minutes" to restore the limit is relocated in the form of a discussion that "prompt action" should be taken to restore the parameter to within the limits. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.3 - INSTRUMENTATION**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|------------------------------|-----------------------------------|--|----------|--|----------------|
| 3.3.1.1, RPS Instrumentation | | | | | |
| 3.3.1.1-LA.1 | Table 3.3.1-2, LCO 3.3.1, 4.3.1.3 | The RPS response times and associated information (description of how the APRM response time is measured). | TRM | 10 CFR 50.59 | 1 |
| 3.3.1.1-LA.2 | 3.3.1 Action footnotes * and ** | The details relating to placing channels in trip (e.g, if tripping causes Trip Function to occur, tripping trip system with the most inoperable channels). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.3.1.1-LA.3 | Table 4.3.1.1-1 Note (b), 4.3.1.2 | Details of the methods for performing CTS 4.3.1.1, the IRM and APRM CHANNEL CHECK (½ decade overlap), and CTS 4.3.1.2, the LOGIC SYSTEM FUNCTIONAL TEST (simulated automatic operation). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.3.1.1-LA.4 | N/A | Not used. | N/A | N/A | N/A |
| 3.3.1.1-LA.5 | 3.3.1-1 Notes (c) and (i) | The LPRM inputs for OPERABILITY of the APRM (2 per level, 14 total); and the system design details describing that the Turbine Stop Valve — Closure and the Turbine Control Valve Fast Closure, Valve Trip System Oil Pressure — Low Functions are automatically bypassed when THERMAL POWER is less than 25% RTP. | Bases | Bases Control Program in ITS Chapter 5 | 1 |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.3 - INSTRUMENTATION**

| | | | | | |
|-------------------------------------|---|---|-------|--|------|
| 3.3.1.1-LA.6 | Table 3.3.1-1 Notes (e), (g), and (j), Table 2.2.1-1 Function 4 | Relocates the following design details: 1) The Main Steam Isolation Valve — Closure Function shall be automatically bypassed when the reactor mode switch is not in the Run position; 2) The Primary Containment Pressure—High Function also actuates the Standby Gas Treatment System; 3) The Turbine Stop Valve—Closure and the Turbine Stop Valve Fast Closure, Valve Trip System Oil Pressure—Low Functions also actuate the EOC-RPT System; and 4) The description that the Reactor Vessel Water Level - Low, Level 3 Allowable Value is in terms of inches "above instrument zero." | UFSAR | 10 CFR 50.59 | 1 |
| 3.3.1.1-LA.7 | Table 2.2.1-1 | Trip Setpoint values. | TRM | 10 CFR 50.59 | 2 |
| 3.3.1.1-LA.8 | Table 4.3.1.1-1 footnote (d) | The definition of the gain adjustment factor. | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.3.1.1-LA.9 | Table 3.3.1-2 footnote ## | The detail concerning the methods of response time testing (that the response time testing and conformance to the administrative limits for the remaining channel including trip unit and relay logic are required). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.3.1.2, SRM Instrumentation | | | | | |
| 3.3.1.2-LA.1 | 4.3.7.6.c | The detail of the method for performing the Surveillance ("with the detector fully inserted"). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.3.1.2-LA.2 | 3.9.2, 4.9.2.a.2 | The details relating to SRM OPERABILITY; i.e., that the SRMs shall be inserted to the normal operating level with continuous indication in the control room. | Bases | Bases Control Program in ITS Chapter 5 | 1, 2 |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.3 - INSTRUMENTATION**

| | | | | | |
|---|--|--|----------------|--|--------------|
| 3.3.1.2-LA.3 | <i>N/A</i> | Not used. | <i>N/A</i> | <i>N/A</i> | <i>N/A</i> |
| 3.3.1.2-LA.4 | 3.9.2 Applicability | The additional spatial limitations when movable detectors are being used. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.3.2.1, Control Rod Block Instrumentation | | | | | |
| 3.3.2.1-LA.1 | Table 3.3.6-1 Note (a) | The statement that the RBM shall be automatically bypassed when a peripheral control rod is selected. | UFSAR | 10 CFR 50.59 | 1 |
| 3.3.2.1-LA.2 | Table 4.3.6-1 Function 1, footnote (c), 4.1.4.1.a, 4.1.4.1.b, 4.1.4.1.c | Details of the methods for performing Surveillances (i.e., the RBM CFT includes the reactor manual control multiplexing system input and the RWM CFT includes verifying correct annunciation of the selection error of at least one out-of-sequence control rod and verifying inability to withdraw an out-of-sequence control rod). | Bases | Bases Control Program in Its Chapter 5 | 3 |
| 3.3.2.1-LA.3 | Table 3.3.6-2 | Trip Setpoint values. | TRM | 10 CFR 50.59 | 2 |
| 3.3.2.1-R.1 | Tables 3.3.6-1, 3.3.6-2, and 4.3.6-1 Trip Functions 2, 3, 4, 5, and 6 | The APRM, SRM, IRM, Scram Discharge Volume, and Recirculation Flow Unit control rod blocks. | TRM | 10 CFR 50.59 | 5 |
| 3.3.2.2, Feedwater System and Main Turbine High Water Level Trip Instrumentation | | | | | |
| 3.3.2.2-LA.1 | Table 3.3.8-2 | Trip Setpoint values. | TRM | 10 CFR 50.59 | 2 |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.3 - INSTRUMENTATION**

| | | | | | |
|--|--|---|-------|--|------|
| 3.3.2.2-LA.2 | 3.3.8 Action b footnote * | The details relating to placing channels in trip (i.e., if tripping causes Trip Function to occur). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.3.3.1, Post Accident Monitoring Instrumentation | | | | | |
| 3.3.3.1-LA.1 | Table 3.3.7.5-1 footnote * | The details relating to operation of the drywell hydrogen and oxygen analyzers (actuated after LOCA). | Bases | Bases Control Program in ITS Chapter 5 | 2 |
| 3.3.3.1-LA.2 | Table 3.3.7.5-1 ACTION 81 | The use of alternate methods of monitoring (initiate the preplanned alternate method of monitoring the parameters). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.3.3.2, Remote Shutdown Monitoring System | | | | | |
| 3.3.3.2-LA.1 | 3.3.7.4, 3.3.7.4 Action a, 4.3.7.4, Table 3.3.7.4-1, Table 4.3.7.4-1 | The CTS details relating to system design and operation (i.e., the specific instrument listings and that remote shutdown panel is external to the control room). | TRM | 10 CFR 50.59 | 1, 2 |
| | | | | | |
| 3.3.4.1, EOC-RPT Instrumentation | | | | | |
| 3.3.4.1-LA.1 | Table 3.3.4.2-1 footnote (b) | The statement that Turbine Stop Valve—Closure and the Turbine Control Valve—Fast Closure shall not be automatically bypassed when THERMAL POWER is greater than or equal to 25% of RATED THERMAL POWER. | Bases | Bases Control Program in ITS Chapter 5 | 1 |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.3 - INSTRUMENTATION**

| | | | | | |
|--------------------------------------|---------------------------------------|--|-------|--|------|
| 3.3.4.1-LA.2 | Table 3.3.4.2-3 | The EOC-RPT System Response Time Limits Table. | TRM | 10 CFR 50.59 | 1 |
| 3.3.4.1-LA.3 | Table 3.3.4.2-2 | Trip Setpoint values. | TRM | 10 CFR 50.59 | 2 |
| 3.3.4.1-LA.4 | 4.3.4.2.3 | The description of the Frequency application that is consistent with the ITS definition of STAGGERED TEST BASIS when applied to the two input Functions. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.3.4.2, ATWS-RPT Instrumentation | | | | | |
| 3.3.4.2-LA.1 | Table 3.3.4.1-2 | Trip Setpoint values. | TRM | 10 CFR 50.59 | 2 |
| | | | | | |
| 3.3.5.1, ECCS Instrumentation | | | | | |
| 3.3.5.1-LA.1 | Table 3.3.3-2 | Trip Setpoint values. | TRM | 10 CFR 50.59 | 2 |
| 3.3.5.1-LA.2 | 4.3.3.2 | The detail relating to methods (simulated automatic operation) for performing the LOGIC SYSTEM FUNCTIONAL TESTS. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.3.5.1-LA.3 | Table 3.3.3-1, including footnote (c) | System design and operation details (e.g., Trip System Nomenclature, specific equipment affected, logic description). | Bases | Bases Control Program in Its Chapter 5 | 1, 2 |
| 3.3.5.1-LA.4 | Table 3.3.3-3 and footnote * | The ECCS response times and associated information. | TRM | 10 CFR 50.59 | 1 |
| | | | | | |
| 3.3.5.2, RCIC System Instrumentation | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.3 - INSTRUMENTATION**

| | | | | | |
|--|--|--|-------|--|------|
| 3.3.5.2-LA.1 | 4.3.5.2 | The detail relating to methods (simulated automatic operation) for performing the LOGIC SYSTEM FUNCTIONAL TESTS. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.3.5.2-LA.2 | Table 3.3.5-1, Note (b) and (c) | System design and operation details (i.e., the number of trip systems, and the logic design for the Manual Initiation and Reactor Vessel Water Level—High, Level 8 Functional Units). | Bases | Bases Control Program in ITS Chapter 5 | 1, 2 |
| 3.3.5.2-LA.3 | Table 3.3.5-2 | Trip Setpoint values. | TRM | 10 CFR 50.59 | 2 |
| 3.3.6.1, Primary Containment Isolation Instrumentation | | | | | |
| 3.3.6.1-LA.1 | Table 3.3.2-2 | Trip Setpoint values. | TRM | 10 CFR 50.59 | 2 |
| 3.3.6.1-LA.2 | Table 3.3.2-3 including footnotes * and # | The Isolation System Instrumentation Response Time Table and associated footnotes. | TRM | 10 CFR 50.59 | 1 |
| 3.3.6.1-LA.3 | 3.3.2 Actions footnotes *, **, and *** | The details relating to placing channels in trip (e.g, if tripping causes Trip Function to occur, tripping trip system with the most inoperable channels). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.3.6.1-LA.4 | 4.3.2.2 | The detail relating to methods (simulated automatic operation) for performing the LOGIC SYSTEM FUNCTIONAL TESTS. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.3.6.1-LA.5 | Table 3.3.2-1, including footnotes (f), (g), and (h) | System design and operational details (i.e., the Valve Groups operated by signal column, the logic description for certain Functions, and that the Manual Initiation Functions isolate the inboard and outboard valves). | Bases | Bases Control Program in ITS Chapter 5 | 1, 2 |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.3 - INSTRUMENTATION**

| | | | | | |
|---|--|--|-------|--|---|
| 3.3.6.1-LA.6 | Table 3.3.2-2 footnote ** | The detail that the Allowable Value for the Reactor Vessel Pressure—High is corrected for cold water head with reactor vessel flooded. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.3.6.1-LA.7 | 3.3.2-3 footnote ## | The detail concerning the methods of response time testing (that the response time testing and conformance to the administrative limits for the remaining channel including trip unit and relay logic are required). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.3.6.1-LA.8 | Tables 3.3.2-1, 3.3.2-2, and 4.3.3.1-1 Trip Function 6.c | RHR Pump Suction Flow - High instrumentation requirements. | TRM | 10 CFR 50.59 | 3 |
| 3.3.6.1-LA.9 | Table 3.3.2-1, 3.3.2-2, and 4.3.2.1-1 Trip Function 3.I | RWCU Pump Suction Flow - High instrumentation requirements. | TRM | 10 CFR 50.59 | 3 |
| | | | | | |
| 3.3.6.2, Secondary Containment Isolation Instrumentation | | | | | |
| 3.3.6.2-LA.1 | Table 3.3.2-2 | Trip Setpoint values. | TRM | 10 CFR 50.59 | 2 |
| 3.3.6.2-LA.2 | 3.3.2 Actions footnotes *, **, and *** | The details relating to placing channels in trip (e.g, if tripping causes Trip Function to occur, tripping trip system with the most inoperable channels). | Bases | Bases Control Program in ITS Chapter 5 | 3 |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.3 - INSTRUMENTATION**

| | | | | | |
|---|--|--|-------|--|---|
| 3.3.6.2-LA.3 | 4.3.2.2 | The detail relating to methods (simulated automatic operation) for performing the LOGIC SYSTEM FUNCTIONAL TESTS. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.3.6.2-LA.4 | Table 3.3.2-1, including footnotes (c) and (e) | System design and operational details (i.e., the Manual Initiation Functions isolate the inboard and outboard valves and specific valves and systems affected). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| | | | | | |
| 3.3.7.1, CRAF System Instrumentation | | | | | |
| 3.3.7.1-LA.1 | Table 3.3.7.1-1 | The measurement range of the Main Control Room Atmospheric Control System Radiation Monitoring System channels. | UFSAR | 10 CFR 50.59 | 1 |
| | | | | | |
| 3.3.8.1, Loss of Power Instrumentation | | | | | |
| 3.3.8.1-LA.1 | Table 3.3.3-2 | Trip Setpoint values. | TRM | 10 CFR 50.59 | 2 |
| 3.3.8.1-LA.2 | 4.3.3.2 | The detail relating to methods (simulated automatic operation) for performing the LOGIC SYSTEM FUNCTIONAL TESTS. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.3.8.1-LA.3 | Tables 3.3.3-1 and 3.3.3-2 | Details relating to system design (the total number of channels provided in the design, the number of channels required to generate a trip and the types of relays). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| | | | | | |
| 3.3.8.2, RPS Electric Power Monitoring | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.3 - INSTRUMENTATION**

| | | | | | |
|--|-----------|--|-------|--|------|
| 3.3.8.2-LA.1 | 4.8.3.4.b | The details relating to methods (simulated automatic operation of the RPS overvoltage, undervoltage, and underfrequency protective relays, tripping logic, and output circuit breakers) for performing the system functional test. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| Current Specification 3/4.3.7.3, Meteorological Monitoring Instrumentation | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| Current Specification 3/4.3.7.11, Explosive Gas Monitoring Instrumentation | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| Current Specification 3/4.3.7.12, Loose Part Detection System | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.4 - REACTOR COOLANT SYSTEM**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|---|---|--|----------|--|----------------|
| 3.4.1, Recirculation Loops Operating | | | | | |
| 3.4.1-LA.1 | 3.4.1.1 Action a.1.a) | The details relating to operational controls of the flow control system during single recirculation loop operation. | UFSAR | 10 CFR 50.59 | 2 |
| 3.4.1-LA.2 | 3.4.1.5 Actions a.1 and a.2.a) | Requirement to "immediately initiate action to" reduce THERMAL POWER to exit Region I when one or both recirculation loops are in operation and to "immediately" reduce CORE THERMAL POWER to reduce power below 36% RTP when no recirculation loops are in operation is relocated in the form of a discussion that "prompt action should be taken" to exit Region I of CTS Figure 3.4.1.5-1 (ITS Figure 3.4.1-1) or reduce THERMAL POWER to below 36% RTP, as applicable. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.4.1-LA.3 | 3.4.1.5 Actions b.1 and b.2 | The details on how to restore APRM and LPRM noise levels within limits. Requirement to "immediately initiate corrective action" to restore APRM and LPRM flux noise levels to within limits is relocated in the form of the discussion that "prompt action should be taken" to satisfy the requirements of the LCO. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.4.1-LA.4 | 4.4.1.5.1. b | Requirement to "initiate the surveillance within 15 minutes" after entering Region II of CTS Figure 3.4.1.5-1 or completing an increase of at least 5% of RATED THERMAL POWER is relocated in the form of the discussion that "prompt action should be taken" to verify APRM and LPRM flux noise levels. | Bases | Bases Control Program in ITS Chapter 5 | 3 |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.4 - REACTOR COOLANT SYSTEM**

| | | | | | |
|------------------------------------|---|--|-------|---|------|
| 3.4.1-LA.5 | 4.4.1.5 footnote # | The details concerning which LPRM detectors to monitor (i.e., detector levels A and C of one LPRM string per core octant plus detectors A and C of one LPRM string in the center region of the core should be monitored). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.4.1-LA.6 | 3.4.1.1 Action a.1.c) | The detail of the actual MCPR correction factor for the MCPR operating limit for single loop operation ("0.01"). | COLR | COLR change control process described in Chapter 5 of the ITS | 3 |
| | | | | | |
| 3.4.2, Flow Control Valves | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.4.3, Jet Pumps | | | | | |
| 3.4.3-LA.1 | 4.4.1.2.1, 4.4.1.2.1. a, 4.4.1.2.2. a | Details of the methods for determining established flow control valve position (determining the loop flow characteristics of the flow control valve for two recirculation loop operation versus single recirculation loop operation and ensuring balanced recirculation loop flows when both recirculation loops are operating). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.4.3-LA.2 | 4.4.1.2.1. b, 4.4.1.2.2. b | Details of the methods of deriving total core flow values during single loop operation (i.e., the established THERMAL POWER-core flow relationship or established core plate differential pressure-core flow relationship for two recirculation loop operation). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.4.4, Safety/Relief Valves | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.4 - REACTOR COOLANT SYSTEM**

| | | | | | |
|---|--------------------------------|---|-------------|--|------|
| 3.4.4-LA.1 | 3.4.2 footnote * | The details relating to lift setting pressure of the safety/relief valves (the lift setting pressure shall correspond to ambient conditions of the valves at nominal operating temperatures and pressures). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| | | | | | |
| 3.4.5, RCS Operational Leakage | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.4.6, RCS Pressure Isolation Valve Leakage | | | | | |
| 3.4.6-LA.1 | Table 3.4.3.2-1 | The list of pressure isolation valves (PIVs). | TRM | 10 CFR 50.59 | 1 |
| 3.4.6-LA.2 | 4.4.3.2.2. a.1 | Requirement to leak test each PIV "at least once per 18 months." | IST Program | IST Program in ITS Chapter 5 | 3 |
| 3.4.6-LC.1 | 3.4.3.2 Action d, 4.4.3.2.2. b | High/low pressure interface valve leakage pressure monitors, along with supporting Actions and Surveillances. | TRM | 10 CFR 50.59 | 3 |
| | | | | | |
| 3.4.7, RCS Leakage Detection Instrumentation | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.4.8, RCS Specific Activity | | | | | |
| 3.4.8-LA.1 | Table 4.4.5-1 Item 5 | Offgas isotopic analysis for xenon and krypton. | TRM | 10 CFR 50.59 | 3 |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.4 - REACTOR COOLANT SYSTEM**

| | | | | | |
|--|---------------------------------|---|--------------|---|----------|
| | | | | | |
| 3.4.9, RHR Shutdown Cooling System - Hot Shutdown | | | | | |
| 3.4.9-LA.1 | LCO 3.4.9.1 | The details of what constitutes an OPERABLE RHR shutdown cooling subsystem (i.e., each subsystem consists of one OPERABLE RHR pump and heat exchanger). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.4.9-LA.2 | 4.4.9.1 | The detail of the method of verifying operation of the RHR shutdown cooling subsystem (circulating reactor coolant). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.4.10, RHR Shutdown Cooling System - Cold Shutdown | | | | | |
| 3.4.10-LA.1 | LCO 3.4.9.2 | The details of what constitutes an OPERABLE RHR shutdown cooling subsystem (i.e., each subsystem consists of one OPERABLE RHR pump and heat exchanger). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.4.10-LA.2 | 4.4.9.2 | The detail of the method of verifying operation of the RHR shutdown cooling subsystem (circulating reactor coolant). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.4.11, RCS Pressure and Temperature Limits | | | | | |
| 3.4.11-LA.1 | 4.4.6.1.1, 4.4.6.1.2 | The specific requirements that operation be to the right of the limits lines of Figures 3.4.6.1-1 and 3.4.6.1-1a. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.4.11-LA.2 | 3.4.6.1 Action | The detail to perform an engineering evaluation to determine the effects of the out-of-limit condition on the structural integrity of the reactor coolant system. | Bases | Bases Control Program in ITS Chapter 5 | 3 |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.4 - REACTOR COOLANT SYSTEM**

| | | | | | |
|--|--|---|-------|--|------|
| 3.4.11-LA.3 | 3.4.1.4 | The detail on where the temperature is monitored (e.g., space or line) to determine the temperature differential between the reactor pressure vessel steam space coolant and the bottom head drain. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.4.11-LA.4 | LCO 3.4.1.4.b, 3.4.1.4 Action, 4.4.1.4 | The details and its associated Action relating to operational limits (maximum operating loop flow rate) during a return to two recirculation pump operation from single recirculation loop operation. | UFSAR | 10 CFR 50.59 | 1 |
| | | | | | |
| 3.4.12, Reactor Steam Dome Pressure | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| Current Specification 3/4.4.8, Structural Integrity | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.5 - ECCS AND RCIC SYSTEM**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|------------------------------|---|---|----------|--|-------------------|
| 3.5.1, ECCS-Operating | | | | | |
| 3.5.1-LA.1 | LCO 3.5.1 | The details relating to ECCS OPERABILITY (i.e., that the ECCS subsystems shall have flow paths capable of taking suction from the suppression chamber and transferring water to the reactor vessel). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.5.1-LA.2 | 4.5.1.a.1, 4.5.1.c.1, 4.5.1.d.2. b | The details relating to methods for performing Surveillances (i.e., venting at the high point vent, verifying actuation of the system throughout its emergency operating sequence, including each automatic valve actuating to the correct position, and verifying proper operation of the ADS valves). | Bases | Bases Control Program in ITS Chapter 5 | 2 3 |
| 3.5.1-LA.3 | 3.5.1 Action j, 4.5.1.a.4, 4.5.1.c.4 | The requirements for corner room watertight doors to be Operable (i.e., closed and capable of repelling water). | TRM | 10 CFR 50.59 | 3 |
| | | | | | |
| 3.5.2, ECCS-Shutdown | | | | | |
| 3.5.2-LA.1 | LCO 3.5.2 | The details of what constitutes an OPERABLE ECCS subsystem. | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.5.2-LA.2 | LCO 3.5.3.b | The suppression pool volume which corresponds to the level limit. | Bases | Bases Control Program in ITS Chapter 5 | 1 |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.5 - ECCS AND RCIC SYSTEM**

| | | | | | |
|---------------------------|---|---|-------|--|---|
| 3.5.2-LA.3 | LCO 3.5.3.b footnote **, 4.5.3.1.a. 2 footnote ** | The plant elevation level which corresponds to the suppression pool level limit. | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| | | | | | |
| 3.5.3, RCIC System | | | | | |
| 3.5.3-LA.1 | LCO 3.7.3 | The details of CTS 3.7.3 relating to system OPERABILITY (in this case that the RCIC System shall have a flow path capable of taking suction from the suppression pool and transferring water to the reactor pressure vessel). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.5.3-LA.2 | 4.7.3.a.1, 4.7.3.a.4, 4.7.3.c.1 | The details relating to methods for performing Surveillances (i.e., by venting from the high point vent, verifying that the RCIC pump controller is in the correct position, and verifying that each automatic valve in the flow path actuates to the proper position during the actuation test). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.5.3-LA.3 | 4.7.3.c.2 | The 135 psig minimum pressure for performing the RCIC System flow test is relocated in the form of a discussion describing when adequate pressure is available to perform the test. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.6 - CONTAINMENT SYSTEMS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|--|----------------|---|-------------|--|----------------|
| 3.6.1.1, Primary Containment | | | | | |
| 3.6.1.1 - LA.1 | 4.6.2.1.d | The initial differential pressure (1.5 psi) of the drywell-to-suppression chamber bypass leak test. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.6.1.2, Primary Containment Air Lock | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.6.1.3, Primary Containment Isolation Valves | | | | | |
| 3.6.1.3 - LA.1 | 4.6.3.3 | The requirement to stroke time test the power operated, non-automatic, PCIVs. | IST Program | 10 CFR 50.59 and 10 CFR 50.55a | 3 |
| 3.6.1.3 - LA.2 | 4.6.3.5.b | Requirements in CTS 4.6.3.5.b concerning the replacement charges for the traversing in-core probe (TIP) explosive valves (i.e., replacement charge shall be from the same batch or from another batch that has had one charge fired, and no charge shall remain in use past its shelf-life and operating-life). | Bases | Bases Control Program in ITS Chapter 5 | 3 |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.6 - CONTAINMENT SYSTEMS**

| | | | | | |
|--|--------------|---|-------|--|------|
| 3.6.1.3-L.7 | 4.6.3.2 | The requirement to perform CTS 4.6.3.2 during COLD SHUTDOWN or REFUELING has been deleted. The proposed Surveillance (for a functional test of each primary containment isolation valve) does not include the restriction on plant conditions. Some isolation valves could be adequately tested in other than Cold Shutdown or Refueling, without jeopardizing safe plant operations. This information is encompassed by the Bases discussion justifying the frequency for ITS 3.6.1.3.7. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.6.1.4, Drywell and Suppression Chamber Pressure | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.6.1.5, Drywell Air Temperature | | | | | |
| 3.6.1.5-LA.1 | 4.6.1.7 | The method for performing the drywell average air temperature Surveillance (i.e., average of the temperatures of the operating return air plenum upstream of the primary containment ventilation heat exchanger coil and cabinet at various elevations and azimuths). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.6.1.6, Suppression Chamber-to-Drywell Vacuum Breakers | | | | | |
| 3.6.1.6-LA.1 | 4.6.4.1.b. 2 | The detail that the opening setpoint is verified from the closed position. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
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**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.6 - CONTAINMENT SYSTEMS**

| 3.6.2.1, Suppression Pool Average Temperature | | | | | |
|---|---|---|-------|--|------|
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.6.2.2, Suppression Pool Water Level | | | | | |
| 3.6.2.2-LA.1 | 3.6.2.1.a. 1 including footnote **, 3.5.3.a including footnote **, 4.5.3.1.a. 1 footnote ** | The suppression pool volumes which correspond to the level limits and the reference as to how the level limits correspond to plant elevation. | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| | | | | | |
| 3.6.2.3, RHR Suppression Pool Cooling | | | | | |
| 3.6.2.3-LA.1 | 3.6.2.3 | The details relating to system OPERABILITY (in this case the suppression pool cooling function is designated as two "independent" loops, each with a pump and flow path). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| | | | | | |
| 3.6.2.4, RHR Suppression Pool Spray | | | | | |
| 3.6.2.4-LA.1 | 3.6.2.2 | The details relating to system OPERABILITY (in this case the suppression pool spray function is designated as two "independent" loops, each with a pump and flow path). | Bases | Bases Control Program in ITS Chapter 5 | 1 |

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.6 - CONTAINMENT SYSTEMS

| | | | | | |
|---|-------------------------------|---|-------------|--|------|
| | | | | | |
| 3.6.3.1, Primary Containment Hydrogen Recombiners | | | | | |
| 3.6.3.1-LA.1 | 3.6.6.1 | The detail relating to system design (i.e., that the recombiners are "independent"). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.6.3.1-LA.2 | 4.6.6.1.b, 4.6.6.1.c. 2 | Details of the methods for performing a system functional test (i.e., the current in each heater phase is within limits, and the increase in reaction chamber gas temperature within 2 hours) and the heater resistance to ground test (perform test within 30 minutes after the system functional test and the heater resistance to ground limit). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.6.3.1-LA.3 | 4.6.6.1.a | CTS 4.6.6.1.a performed every 92 days is a functional test of the hydrogen recombiner which checks the recombiner flow control and recirculation valves. | ITS Program | 10 CFR 50.59 and 10 CFR 50.55 | 3 |
| The requirement to cycle | | of the hydrogen recombiner every 92 days | | | |
| 3.6.3.2, Primary Containment Oxygen Concentration | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.6.4.1, Secondary Containment | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.6.4.2, Secondary Containment Isolation Valves | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.6 - CONTAINMENT SYSTEMS**

| | | | | | |
|--|----------------------------------|--|-------|--|---|
| 3.6.4.2-LA.1 | 3/4.6.5.2, Table 3.6.5.2-1 | The list of secondary containment isolation dampers referenced in CTS 3/4.6.5.2 and appearing in CTS Table 3.6.5.2-1 with their isolation times, are proposed to be relocated to the Technical Requirements Manual consistent with Generic Letter 91-08. In addition, due to the relocation, the name of the isolation dampers has been generically changed to Secondary Containment Isolation Valves (SCIVs). | TRM | 10 CFR 50.59 | 1 |
| | | | | | |
| 3.6.4.3, Standby Gas Treatment System | | | | | |
| 3.6.4.3-LA.1 | 3.6.5.3 | The detail relating to system design (i.e., that the SGT subsystems are "independent") | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.6.4.3-LA.2 | 4.6.5.3.a | Details of the methods for performing the standby gas treatment subsystem 31 day operating Surveillance (by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.7 - PLANT SYSTEMS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|--|----------------|---|----------|--|----------------|
| 3.7.1, Residual Heat Removal Service Water System | | | | | |
| 3.7.1-LA.1 | LCO 3.7.1.1 | The details relating to system OPERABILITY (that the RHRSW subsystems shall be independent and that each subsystem shall have two RHRSW pumps capable of taking suction from the CSCS water tunnel and transferring the water to the associated RHR heat exchanger). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.7.1-LA.2 | 3/4.7.1.1 | LCO requirements, Actions, and Surveillance Requirements for the RHRSW System when in MODES 4 and 5. | TRM | 10 CFR 50.59 | 3 |
| | | | | | |
| 3.7.2, Diesel Generator Cooling Water System | | | | | |
| 3.7.2-LA.1 | LCO 3.7.1.2 | The details relating to system OPERABILITY (that the DGCW subsystems will be independent and each subsystem shall have one OPERABLE DGCW pump, and an OPERABLE flow path capable of taking suction from the CSCS water tunnel and transferring water to the associated diesel generator). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.7.2-LA.2 | 3/4.7.1.2 | LCO requirements, Actions, and Surveillance Requirements for the DGCW System when in MODES or conditions other than MODE 1, 2, or 3. | TRM | 10 CFR 50.59 | 3 |
| 3.7.2-LA.3 | 4.7.1.2.b | The details regarding the specific start signals (from the associated DG or from the LPCS pump) to be used during the DGCW automatic start Surveillance. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.7.3, Ultimate Heat Sink | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.7 - PLANT SYSTEMS**

| | | | | | |
|---|---------------|--|-------|--|---|
| 3.7.3-LA.1 | 3/4.7.1.3 | LCO requirements, Actions, and Surveillance Requirements for the Ultimate Heat Sink when in MODES or conditions other than MODE 1, 2, or 3. | TRM | 10 CFR 50.59 | 3 |
| 3.7.3-LA.2 | 4.7.1.3.a | Details of the methods for determining the level of sediment deposition in the CSCS pond (by a series of sounding cross-sections compared to as-built soundings). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.7.4, Control Room Area Filtration System | | | | | |
| 3.7.4-LA.1 | LCO 3.7.2 | The detail relating to system design (that the CRAF subsystems are "independent"). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.7.4-LA.2 | 4.7.2.d.2. a) | Requirement to verify that the CRAF System automatically switches to the pressurization mode of operation on detection of smoke in an outside air intake. | TRM | 10 CFR 50.59 | 3 |
| 3.7.4-LA.3 | 4.7.2.d.2 | Details regarding the methodology for performing a surveillance to verify the ability of each CRAF System to maintain a positive pressure in the control room and auxiliary electric equipment rooms relative to the adjacent areas during emergency train operation at a specified flow rate (by manually initiating flow through the control room and auxiliary equipment room recirculation filters). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.7.4-LA.4 | 4.7.2.d.2 | Details of the methods for performing the CRAF System actuation test (the source of the signal used for automatic actuation and that the CRAF subsystems automatically switch to the pressurization mode of operation) | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.7 - PLANT SYSTEMS**

| 3.7.5, Control Room Area Ventilation Air Conditioning System | | | | | |
|--|--------------|---|-------|--|------|
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.7.6, Main Condenser Offgas | | | | | |
| 3.7.6-LA.1 | 4.11.2.2.1 | The requirement to continuously monitor radioactivity rate of noble gases prior to the holdup line. | ODCM | ODCM Control Process in ITS Chapter 5 | 3 |
| 3.7.6-LA.2 | 4.11.2.2.2 | Details defining the methods for performing this Surveillance, the location of the sample, and method for determining when an increase has occurred. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.7.7, Main Turbine Bypass System | | | | | |
| 3.7.7-LA.1 | 4.7.10.b.1 | The details relating to methods of performing the main turbine bypass system functional test (simulated automatic actuation and verifying each automatic valve actuates to its correct position). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.7.7-LA.2 | 4.7.10.b.2 | Details of the actual TURBINE BYPASS SYSTEM RESPONSE TIME. | TRM | 10 CFR 50.59 | 1 |
| | | | | | |
| 3.7.8, Spent Fuel Storage Pool Water Level | | | | | |
| 3.7.8-LA.1 | 3.9.9 Action | The requirement to suspend crane operations with loads in the spent fuel storage pool area when the spent fuel storage pool water level is not within the limit. | UFSAR | 10 CFR 50.59 | 3 |
| 3.7.8-LA.2 | 3.9.9 Action | Details of the methods for suspending movement of fuel assemblies (after placing the fuel assemblies in a safe condition). | Bases | Bases Control Program in ITS Chapter 5 | 3 |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.7 - PLANT SYSTEMS**

| | | | | | |
|---|---------|--|------|--------------|------|
| | | | | | |
| Current Specification 3/4.7.4, Sealed Source Contamination | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| Current Specification 3/4.7.7, Area Temperature Monitoring | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| Current Specification 3/4.7.8, Structural Integrity of Class 1 Structures | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| Current Specification 3/4.7.9, Snubbers | | | | | |
| None- ⁶ LA.1 NONE | 3/4.7.9 | Snubber inspection and testing requirements. | TRM | 10 CFR 50.59 | 3 |
| | | | | | |

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**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|--------------------------------------|--|---|--------------|---|----------------|
| 3.8.1, AC Sources - Operating | | | | | |
| 3.8.1-LA.1 | LCO 3.8.1.1.a, LCO 3.8.1.1.b, LCO 3.8.1.1.b. 3, LCO 3.8.2.1.d | The details relating to system design and OPERABILITY (i.e., that the offsite circuits are "physically independent," the DGs are "separate and independent," the nomenclature of the DGs, that each DG has "a separate fuel transfer pump," and some components of the opposite unit's offsite circuit). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.8.1-LA.2 | N/A | Not used. | N/A | N/A | N/A |
| 3.8.1-LA.3 | 3.8.1.1 Action g | Details regarding the subsystems required to be declared inoperable. | Bases | Bases Control Program in ITS Chapter 5 | 3 |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| | | | | | |
|------------------------------|--|--|------------|--|------------|
| 3.8.1-LA.4 | * footnote to CTS 4.8.1.1.2, 4.8.1.1.2. d.4, 4.8.1.1.2. d.5, 4.8.1.1.2. d.6, 4.8.1.1.2. d.8, and 4.8.1.1.2. e, 4.8.1.1.2. a.4 footnote ** | The detail that the engine prelube requirements are "as recommended by the manufacturer," and the reason for performing the diesel engine warmup and loading procedures (i.e., in order to minimize mechanical stress and wear on the DGs caused by fast starting of the DGs). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.8.1-LA.5 | 4.8.1.1.2. d.2 | The specific kilowatt value of the single largest post-accident load for the single load rejection Surveillance Requirement. | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.8.1-LA.6 | <i>N/A</i> | Not used. | <i>N/A</i> | <i>N/A</i> | <i>N/A</i> |
| 3.8.1-LA.7 | 4.8.1.1.2. d.9, LCO 3.8.2.1.d | The specific load value for the auto-connected loads and the specific bus designation (141Y and 241Y) associated with the offsite circuit path. | UFSAR | 10 CFR 50.59 | 1 |
| 3.8.1-LA.8 | LCO 3.8.1.1.b footnote * | The details that the control circuit for the unit cross-tie breakers between buses 142Y and 242Y are temporarily modified to allow the breakers to be closed. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.8.2, AC Sources - Shutdown | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| | | | | | |
|---|------------------------|--|--------------------|--|------------|
| 3.8.2-LA.1 | LCO 3.8.1.2.b. 3 | The detail relating to system design and OPERABILITY (i.e., that each DG has a fuel oil transfer pump). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| | | | | | |
| 3.8.3, Diesel Fuel Oil and Starting Air | | | | | |
| 3.8.3-LA.1 | 4.8.1.1.2.f | The 10 year surveillance to drain, remove sediment, and clean each fuel oil tank and to perform a pressure test on the DG fuel oil piping system. | TRM | 10 CFR 50.59 | 3 |
| | | | | | |
| 3.8.4, DC Sources - Operating | | | | | |
| 3.8.4-LA.1 | LCO 3.8.2.3 | Details relating to system OPERABILITY (what constitutes a DC Source subsystem) relocated to Bases and the actual battery identification numbers are relocated to the UFSAR. | Bases UFSAR | Bases Control Program in ITS Chapter 5 10 CFR 50.59 | 1 1 |
| 3.8.4-LA.2 | 4.8.2.3.2. d | The details of the DC loads and the licensed service duration for the battery service test. | UFSAR | 10 CFR 50.59 | 1 |
| 3.8.4-LA.3 | 4.8.2.3.2.f | Specific limits on battery degradation and guidance regarding the intent of the term "degradation." | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.8.5, DC Sources - Shutdown | | | | | |
| 3.8.5-LA.1 | LCO 3.8.2.4 | Details relating to system OPERABILITY (what constitutes a DC Source subsystem) relocated to Bases and the actual battery identification numbers are relocated to the UFSAR. | Bases UFSAR | Bases Control Program in ITS Chapter 5 10 CFR 50.59 | 1 1 |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| | | | | | |
|--|--|---|--------------|---|----------|
| | | | | | |
| 3.8.6, Battery Cell Parameters | | | | | |
| 3.8.6-LA.1 | 4.8.2.3.2. b.3 | Details relating to the plant specific determination of "representative" are relocated, since IEEE-450 requires only "representative" cells be measured for temperature and every sixth cell (which is approximately 10 cells for the LaSalle 1 and 2 125V batteries) is provided as a suggestion only in IEEE-450. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.8.7, Distribution Systems - Operating | | | | | |
| 3.8.7-LA.1 | 3.8.2.1 including Actions a, b, and c, 3.8.2.3 including Actions a, b, c, 4.8.2.1, 4.8.2.3.1, 4.7.3.d | The details relating to system design (the list of buses) and OPERABILITY (the buses are required to be energized). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.8.7-LA.2 | 4.8.2.3.1, 4.7.3.d.1. a) | The details for verifying the required Distribution Systems are OPERABLE (the voltage limit and that the charger and battery provide the power). | UFSAR | 10 CFR 50.59 | 1 |
| | | | | | |
| 3.8.8, Distribution Systems - Shutdown | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| | | | | | |
|---|--|--|-------|--|------|
| 3.8.8-LA.1 | 3.8.2.2 including Actions a, b, and c, 3.8.4.2 including Actions a, b, and d, 4.8.2.2, 4.8.2.4.1 | The details relating to system design (the list of buses) and OPERABILITY (the buses are required to be energized). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.8.8-LA.1 | 4.8.2.4.1 | The detail (voltage limit) for verifying the required DC Distribution subsystems are OPERABLE. | UFSAR | 10 CFR 50.59 | 1 |
| | | | | | |
| Current Specification 3/4.8.3.1, AC Circuits Inside Primary Containment | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| Current Specification 3/4.8.3.2, Primary Containment Penetration Conductor Overcurrent Protective Devices | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| Current Specification 3/4.8.3.3, Motor Operated Valves Thermal Overload Protection | | | | | |
| None - LA.1 | 3/4.8.3.3 | The requirements of CTS 3/4.8.3.3 for bypass devices that are associated with thermal overload protection of the valves listed in CTS Table 3.8.3.3-1. | TRM | 10 CFR 50.59 | 3 |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.9 - REFUELING OPERATIONS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|--|-----------------|--|----------|--|----------------|
| 3.9.1, Refueling Equipment Interlocks | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.9.2, Refuel Position One-Rod-Out Interlock | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.9.3, Control Rod Position | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.9.4, Control Rod Position Indication | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.9.5, Control Rod OPERABILITY - Refueling | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.9.6, RPV Water Level - Irradiated Fuel | | | | | |
| 3.9.6-LA.1 | 3.9.8 Action | Details of the methods for suspending movement of fuel assemblies (after placing the fuel assemblies in a safe condition). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.9.7, RPV Water Level - New Fuel or Control Rods | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.9 - REFUELING OPERATIONS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|---|-----------------|--|----------|--|----------------|
| 3.9.7-LA.1 | 3.9.8 Action | Details of the methods for suspending movement of fuel assemblies and control rods (after placing the fuel assemblies and control rods in a safe condition). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.9.8, Residual Heat Removal - High Water Level | | | | | |
| 3.9.8-LA.1 | LCO 3.9.11.1 | The details in CTS 3.9.11.1.a and 3.9.11.1.b of what constitutes an OPERABLE RHR shutdown cooling subsystem (i.e., each subsystem consists of one OPERABLE RHR pump and heat exchanger). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.9.8-LA.2 | 4.9.11.1 | The detail of the method of verifying operation of the RHR shutdown cooling subsystem (circulating reactor coolant). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.9.9, Residual Heat Removal - Low Water Level | | | | | |
| 3.9.9-LA.1 | LCO 3.9.11.2 | The details in CTS 3.9.11.2.a and 3.9.11.2.b of what constitutes an OPERABLE RHR shutdown cooling subsystem (i.e., each subsystem consists of one OPERABLE RHR pump and heat exchanger). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.9.9-LA.2 | 4.9.11.2 | The detail of the method of verifying operation of the RHR shutdown cooling subsystem (circulating reactor coolant). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.9 - REFUELING OPERATIONS

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|--|----------------|---|-------------|---------------------------|----------------|
| <u>None - LA.1</u> | <u>3/4.9.4</u> | Current Specification 3/4.9.4, Decay Time | <u>TRM</u> | <u>10 CFR 50.59</u> | <u>(3)</u> |
| <u>NONE</u> | <u>NONE</u> | <u>NONE</u> 24 hour decay time following subcriticality required prior to moving irradiated fuel in the reactor vessel. | <u>NONE</u> | <u>NONE</u> | <u>NONE</u> |
| Current Specification 3/4.9.5, Communications | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| Current Specification 3/4.9.6, Crane and Hoist | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| Current Specification 3/4.9.7, Crane Travel | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
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**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.10 - SPECIAL OPERATIONS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|--|---|--|----------|--|----------------|
| 3.10.1, Reactor Mode Switch Interlock Testing | | | | | |
| 3.10.1-LA.1 | Table 1.2 footnote #, 3.9.1 footnote ## | The method used to verify control rods remain fully inserted (by verification using a second licensed operator or other technically qualified member of the unit technical staff). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.10.2, Single Control Rod Withdrawal - Hot Shutdown | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.10.3, Single Control Rod Withdrawal - Cold Shutdown | | | | | |
| 3.10.3-LA.1 | LCO 3.9.10.1.d 4.9.10.1.d | The details of the recommended procedures for disarming control rods (i.e., electrically or hydraulically). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.10.4, Single Control Rod Drive Removal - Refueling | | | | | |
| 3.10.4-LA.1 | LCO 3.9.10.1.d 4.9.10.1.d | The details of the recommended procedures for disarming control rods (i.e., electrically or hydraulically). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.10.5, Multiple Control Rod Withdrawal - Refueling | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| 3.10.6, Control Rod Testing - Operating | | | | | |

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.10 - SPECIAL OPERATIONS

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|------------------------------|----------------|---|----------|---------------------------|----------------|
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.10.7, SDM Test - Refueling | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| NONE | | Current Specification 3/4.10.1, Primary Containment Integrity | | | |
| None-M.1 | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| NONE | | Current Specification 3/4.10.5, Oxygen Concentration | | | |
| None-M.1 | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| NONE | | Current Specification 3/4.10.6, Training Startups | | | |
| None-M.1 | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| NONE | | Current Specification 3/4.10.8, Suppression Chamber Water Temperature (Unit 1 only) | | | |
| None-A.1 | NONE | NONE | NONE | NONE | NONE |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
CHAPTER 4.0 - DESIGN FEATURES**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|--------------------------|--|---|----------|---------------------------|----------------|
| 4.0-LA.1 | 5.2.1, 5.2.2, 5.2.3, 5.4, 5.4.1, 5.4.2 | Primary containment configuration and design details, primary containment design temperatures and pressures, secondary containment design details, and the Reactor Coolant System design pressure and temperature and volume. | UFSAR | 10 CFR 50.59 | 1 |
| 4.0-LA.2 | 5.3.2 | The nominal active control rod assembly absorber length. | UFSAR | 10 CFR 50.59 | 1 |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|----------------------------|--|--|-----------|---------------------------|----------------|
| 5.1, Responsibility | | | | | |
| 5.1-LA.1 | 6.1.A.2 | Replaces the specific title "Plant Manager" with the generic title "station manager" and relocates the specific title. | QA Manual | 10 CFR 50.54 | 3 |
| 5.1-LA.2 | 6.1.B | The requirement that delineates the responsibility of the Shift Manager for directing and commanding the overall operation of the facility on his shift. | UFSAR | 10 CFR 50.59 | 3 |
| | | | | | |
| 5.2, Organization | | | | | |
| 5.2-LA.1 | 6.1.A.1, 6.1.A.2, 6.1.A.3, 6.1.C.6, 6.1.C.8 | Replaces the specific title "Chief Nuclear Officer" with the generic term "a corporate officer." Replaces the specific title "Plant Manager" with the generic title "station manager." Replaces the specific title "Shift Manager" with the generic term "shift manager." Replaces the specific titles "Operations Manager" and "Shift Operations Supervisor" with the generic titles "operations manager" and "shift operations supervisor." The specific titles are relocated. | QA Manual | 10 CFR 50.54 | 3 |
| 5.2-LA.2 | 6.1.C.1, 6.1.C.3, Figure 6.1-3 footnote (b) | Details that require all CORE ALTERATIONS to be observed and directly supervised by either a licensed SRO or SRO limited to fuel handling, who has no other concurrent responsibilities during this operation and the details concerning location of RO's and SRO's. | UFSAR | 10 CFR 50.59 | 3 |
| 5.2-LA.3 | 6.1.C.5, including footnote # | The Independent Safety Engineering Group requirements. | QA Manual | 10 CFR 50.54 | 3 |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS**

| | | | | | |
|---------------------------------------|---|---|-----------|--------------|---|
| 5.2-LA.4 | Figure 6.1-3, including footnotes (a) and (b) | Details of the minimum shift crew requirements. | UFSAR | 10 CFR 50.59 | 3 |
| | | | | | |
| 5.3, Unit Staff Qualifications | | | | | |
| 5.3-LA.1 | 6.1.D, 6.1.D.1, 6.1.D.2 | Replaces the specific titles "Health Physics Supervisor" and "Radiation Protection Technician" with the generic titles "radiation protection manager" and "radiation protection technician." The specific titles are relocated. | QA Manual | 10 CFR 50.54 | 3 |
| 5.3-LA.2 | 6.1.D | The requirement that the qualifications of the station management shall meet those described in ANSI N18.1-1971. | QA Manual | 10 CFR 50.54 | 3 |
| | | | | | |
| 5.4, Procedures | | | | | |
| 5.4-LA.1 | 6.2.A.e | The requirement that written procedures for the PROCESS CONTROL PROGRAM (PCP) be established, implemented, and maintained. | UFSAR | 10 CFR 50.59 | 3 |
| 5.4-LA.2 | 6.2.C, 6.2.D | The details of procedure reviews and approvals including temporary changes. | QA Manual | 10 CFR 50.54 | 3 |
| | | | | | |
| 5.5, Programs and Manuals | | | | | |
| 5.5-LA.1 | 6.2.F.2 | The details contained in CTS 6.2.F.2, "In-Plant Radiation Monitoring." | UFSAR | 10 CFR 50.59 | 3 |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS**

| | | | | | |
|-----------------------------|---|---|-------------|---------------------------------------|---|
| 5.5-LA.2 | 6.2.F.5 | The details contained in CTS 6.2.F.5, "Radiological Environmental Monitoring Program." | ODCM | ODCM Control Process in ITS Chapter 5 | 3 |
| 5.5-LA.3 | 6.2.F.6, 6.8.2.b | Requirement that the changes to the Inservice Inspection Program for Post Tensioning Tendons must be reviewed and approved by the Onsite Review and Investigative Function and the requirement that the ODCM must be reviewed and accepted by the Onsite Review and Investigative Function, prior to implementation and to document this review and acceptance. | QA Manual | 10 CFR 50.54 | 3 |
| 5.5-LA.4 | 4.0.5, 4.0.5.a, 4.0.5.b, 4.0.5.c, 4.0.5.d, 4.0.5.f | Details of the Inservice Inspection (ISI) Program are relocated; and since the Inservice Testing Program is the only requirement remaining, the reference to ASME Code Class 1, 2, and 3 "components" has been changed to "pumps and valves" for clarity. | ISI Program | 10 CFR 50.55a | 3 |
| 5.5-LA.5 | 4.0.5.a | Details of the Inservice Testing Program: | IST Program | 10 CFR 50.55a | 3 |
| 5.5-LA.6 | 3/4.11.1.1 3/4.11.2.1 | The details for implementing the liquid holdup tank and explosive gas mixture requirements. | TRM | 10 CFR 50.59 | 3 |
| 5.5-LA.7 | 5.7, Table 5.7.1-1 | Details of the components governed by the Component Cyclic or Transient Limit Specification. | UFSAR | 10 CFR 50.59 | 3 |
| 5.5-LA.8 | 6.8.2.b | Replaces the specific title "Plant Manager" with the generic title "station manager." The specific title is relocated. | QA Manual | 10 CFR 50.54 | 3 |
| | | | | | |
| 5.6, Reporting Requirements | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS**

| | | | | | |
|---|---------------------|--|-----------|--|--------|
| 5.6-LA.1 | 6.6.A.1 | The details associated with the Startup Report. | TRM | 10 CFR 50.59 | 3 |
| 5.6-LA.2 | 6.6.A.6.a. (2) | The details associated with the MCPR Specification (i.e., scram time dependent MCPR limits, power and flow dependent MCPR limits, and effects of analyzed equipment out of service). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 5.6-LA.3 | 6.6.A.6.b | The details of the actual topical reports document date, revision number, volume, supplement and company. | COLR | COLR Control Process In ITS Chapter 5 | ⑧ ① |
| 5.7, High Radiation Area | | | | | |
| 5.7-LA.1 | 6.1.1.1, 6.1.1.3 | Replaces the specific title "Health Physicist" with the generic term "radiation protection manager." Replaces the specific title "Shift Manager" with the generic term "shift manager." The specific titles are relocated. | QA Manual | 10 CFR 50.54 | 3 |
| Current Specification 6.1.E/F, Training | | | | | |
| None-LA.1 | 6.1.E, 6.1.F | The details on training and replacement training of station personnel. | UFSAR | 10 CFR 50.59 | 3 |
| Current Specification 6.2.B, Radiation Protection Program | | | | | |
| None-LA.1 | 6.2.B | The details on Radiation Protection Program procedures. | UFSAR | 10 CFR 50.59 | 3 |
| Current Specification 6.3, Reportable Event Action | | | | | |

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**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS**

| | | | | | |
|---|-------|--|-----------|--------------|---|
| None-LA.1 | 6.3.b | The details related to Reportable Event reviews (by the Onsite Review and Investigative Function). | QA Manual | 10 CFR 50.54 | 3 |
| | | | | | |
| Current Specification 6.4, Safety Limit Violation | | | | | |
| None-LA.1 | 6.4 | The requirements for: 1) notification of the Site Vice President and Director of Safety Review in the event of a Safety Limit violation; and 2) the Onsite and Offsite Review Investigative Functions to review the Safety Limit Violation Report. | QA Manual | 10 CFR 50.54 | 3 |
| | | | | | |
| Current Specification 6.5, Plant Operating Records | | | | | |
| None-LA.1 | 6.5 | The details contained in the Plant Operating Records Specification. | QA Manual | 10 CFR 50.54 | 3 |
| | | | | | |
| Current Specification 6.7, Process Control Program | | | | | |
| None-LA.1 | 6.7 | The details contained in the Process Control Program Specification and the definition of PROCESS CONTROL PROGRAM. | UFSAR | 10 CFR 50.59 | 3 |
| | | | | | |
| Current Specification 6.9, Major Changes to Radioactive Waste Treatment System | | | | | |

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

| | | | | | |
|-----------|-----|---|------|---------------------------------------|---|
| None-LA.1 | 6.9 | The requirements regarding major changes to the radioactive waste treatment systems (i.e., a description of the content of the report to be submitted to the NRC regarding the major changes and a requirement that the major changes become effective upon review and acceptance by the Onsite Review and Investigative Function). | ODCM | ODCM Control Process in ITS Chapter 5 | 3 |
|-----------|-----|---|------|---------------------------------------|---|

CHANGE TYPE

1. Details of system design and system description including design limits
2. Description of system operation
3. Procedural details for meeting TS requirement, relocated reporting requirements and relocated specification requirements.

TABLE R - RELOCATED SPECIFICATIONS
CHAPTER 1.0 - USE AND APPLICATION

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|--------------------------|----------------|---------|----------|---------------------------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
CHAPTER 2.0 - SAFETY LIMITS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|--------------------------|----------------|---------|----------|---------------------------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.0 - LCO AND SR APPLICABILITY**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|--------------------------|----------------|---------|----------|---------------------------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|---------------------------------------|----------------|---------|----------|---------------------------|
| 3.1.1, SHUTDOWN MARGIN | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.1.2, Reactivity Anomalies | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.1.3, Control Rod OPERABILITY | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|---------------------------------------|------------------------------|---|--------------------------|---|
| 3.1.4, Control Rod Scram Times | | | | |
| 3.1.4.LA.1 NONE | 4.1.3.2.c NONE | ITS SR 3.1.4.2 will test a "representative sample" of control rods each 120 days of power operation instead of the CTS requirement of "10% of the control rods on a rotating basis." The details of what constitutes a representative sample are relocated. NONE | Bases NONE | Bases Control Program in ITS Chapter 5 NONE |
| 3.1.5, Control Rod Scram Accumulators | | | | |
| NONE | NONE | NONE | NONE | NONE |
| 3.1.6, Rod Pattern Control | | | | |
| NONE | NONE | NONE | NONE | NONE |
| 3.1.7, Standby Liquid Control System | | | | |
| 3.1.7.LA.1 NONE | 4.1.5.a.2 NONE | The detail of the method for performance of the temperature verification surveillance (verifying temperature "on the local indicator"). NONE | Bases NONE | Bases Control Program in ITS Chapter 5 NONE |
| 3.1.7.LA.2 | 4.1.5.c.1 | The details of the method for performing the Surveillance to verify flow through the SLC subsystem into the reactor pressure vessel (initiating an explosive valve and the requirements on the replacement charges for explosive valve). | Bases | Bases Control Program in ITS Chapter 5 |

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TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|--|------------------------------|--|-------------|--|
| 3.1.7-LA.3 | 4.1.5.c.1, 4.1.5.c.4 | The details of the method for performing: 1) The Surveillance to verify flow through the SLC subsystem into the reactor pressure vessel, and 2) The Surveillance to demonstrate all piping between the SLC storage tank and the pump suction is unblocked. | Bases | Bases Control Program in ITS Chapter 5 |
| 3.1.7-LA.4 | 4.1.5.c.3 | The testing requirements for SLC System relief valve setting verification. | IST Program | IST Program in ITS Chapter 5 |
| 3.1.7-LA.5 | Figure 3.1.5-2 | The contained tank volumes associated with the SLC storage tank low level and high level alarms. | UFSAR | 10 CFR 50.59 |
| 3.1.8, SDV Vent and Drain Valves | | | | |
| NONE | NONE | NONE | NONE | NONE |
| Current Specification 3/4.1.3.8, Control Rod Drive Housing Support | | | | |
| None-L.1 NONE | 3/4.1.3.8 NONE | Requirement for Control Rod Drive Housing Support to be in place NONE | NONE | NONE |
| Current Specification 3/4.1.6, Economic Generation Control System | | | | |
| None-R.1 | 3/4.1.6 | The Economic Generation Control System requirements. | TRM | 10 CFR 50.59 |

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Also not in Section E of Safety eval.

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.2 - POWER DISTRIBUTION LIMITS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|--|----------------|---------|----------|---------------------------|
| 3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.2.2, MINIMUM CRITICAL POWER RATIO | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.2.3, LINEAR HEAT GENERATION RATE | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.3 - INSTRUMENTATION**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|---|---|--|----------|---------------------------|
| 3.3.1.1, RPS Instrumentation | | | | |
| 3.3.1.1-R.1 | Tables 2.2.1-1 and 3.3.1-1, Functional Units 13.a and 13.b | The Control Rod Drive (CRD) Charging Water Header Pressure-Low scram and associated Delay Timer Functions. | TRM | 10 CFR 50.59 |
| | | | | |
| 3.3.1.2, SRM Instrumentation | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.3.2.1, Control Rod Block Instrumentation | | | | |
| 3.3.2.1-R.1 | Tables 3.3.6-1, 3.3.6-2, and 4.3.6-1 Trip Functions 2, 3, 4, 5, and 6 | The APRM, SRM, IRM, Scram Discharge Volume, and Recirculation Flow Unit control rod blocks. | TRM | 10 CFR 50.59 |
| | | | | |
| 3.3.2.2, Feedwater System and Main Turbine High Water Level Trip Instrumentation | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.3.3.1, Post Accident Monitoring Instrumentation | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.3 - INSTRUMENTATION**

| | | | | |
|---|---|--|------|--------------|
| 3.3.3.1-R.1 | Tables 3.3.7.5-1 and 4.3.7.5-1, Instruments 5, 7, 11, 12, and 13, 3/4.4.2 | Suppression Chamber Air Temperature, Drywell Air Temperature, Safety/Relief Valve Position Indicators, Noble Gas Monitor-Main Stack, and Noble Gas Monitor-Standby Gas Treatment System Stack. | TRM | 10 CFR 50.59 |
| | | | | |
| 3.3.3.2, Remote Shutdown Monitoring System | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.3.4.1, EOC-RPT Instrumentation | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.3.4.2, ATWS-RPT Instrumentation | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.3.5.1, ECCS Instrumentation | | | | |
| 3.3.5.1-R.1 | Tables 3.3.3-1, 3.3.3-2, and 4.3.3.1-1 Trip Functions A.2.i and B.2.h | ADS Manual Inhibit Switch Function. | TRM | 10 CFR 50.59 |
| | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.3 - INSTRUMENTATION**

| 3.3.5.2, RCIC System Instrumentation | | | | |
|--|-----------|---|------|--------------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.3.6.1, Primary Containment Isolation Instrumentation | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.3.6.2, Secondary Containment Isolation Instrumentation | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.3.7.1, CRAF System Instrumentation | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.3.8.1, Loss of Power Instrumentation | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.3.8.2, RPS Electric Power Monitoring | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.3.7.3, Meteorological Monitoring Instrumentation | | | | |
| None-R.1 | 3/4.3.7.3 | The Meteorological Monitoring Instrumentation requirements. | TRM | 10 CFR 50.59 |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.3 - INSTRUMENTATION**

| | | | | |
|---|-------------------|---|------------|---------------------|
| | | | | |
| Current Specification 3/4.3.7.11, Explosive Gas Monitoring Instrumentation | | | | |
| None-R.1 | 3/4.3.7.11 | The Explosive Gas Monitoring Instrumentation requirements. | TRM | 10 CFR 50.59 |
| | | | | |
| Current Specification 3/4.3.7.12, Loose Part Detection System | | | | |
| None-R.1 | 3/4.3.7.12 | The Loose Part Detection System requirements. | TRM | 10 CFR 50.59 |
| | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.4 - REACTOR COOLANT SYSTEM**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|---|----------------|---------|----------|---------------------------|
| 3.4.1, Recirculation Loops Operating | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.4.2, Flow Control Valves | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.4.3, Jet Pumps | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.4.4, Safety/Relief Valves | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.4.5, RCS Operational Leakage | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.4.6, RCS Pressure Isolation Valve Leakage | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.4.7, RCS Leakage Detection Instrumentation | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.5 - ECCS AND RCIC SYSTEM**

| | | | | |
|--|---------|--|------|--------------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.4.8, RCS Specific Activity | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.4.9, RHR Shutdown Cooling System - Hot Shutdown | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.4.10, RHR Shutdown Cooling System - Cold Shutdown | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.4.11, RCS Pressure and Temperature Limits | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.4.12, Reactor Steam Dome Pressure | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.4.8, Structural Integrity | | | | |
| None-R.1 | 3/4.4.8 | Entire Specification containing requirements for structural integrity of the ASME Code Class 1, 2, and 3 components. | TRM | 10 CFR 50.59 |
| | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.5 - ECCS AND RCIC SYSTEM**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|--------------------------|----------------|---------|----------|---------------------------|
| 3.5.1, ECCS-Operating | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.5.2, ECCS-Shutdown | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.5.3, RCIC System | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.6 - CONTAINMENT SYSTEMS

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|---|----------------|---------|----------|---------------------------|
| 3.6.1.1, Primary Containment | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.1.2, Primary Containment Air Lock | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.1.3, Primary Containment Isolation Valves | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.1.4, Drywell and Suppression Chamber Pressure | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.1.5, Drywell Air Temperature | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.1.6, Suppression Chamber-to-Drywell Vacuum Breakers | | | | |
| NONE | NONE | NONE | NONE | NONE |
| 3.6.2.1, Suppression Pool Average Temperature | | | | |
| NONE | NONE | NONE | NONE | NONE |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.6 - CONTAINMENT SYSTEMS**

| | | | | |
|--|------|------|------|------|
| | | | | |
| 3.6.2.2, Suppression Pool Water Level | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.2.3, RHR Suppression Pool Cooling | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.2.4, RHR Suppression Pool Spray | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.3.1, Primary Containment Hydrogen Recombiners | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.3.2, Primary Containment Oxygen Concentration | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.4.1, Secondary Containment | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.4.2, Secondary Containment Isolation Valves | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.6 - CONTAINMENT SYSTEMS**

| | | | | |
|--|------|------|------|------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.4.3, Standby Gas Treatment System | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.7 - PLANT SYSTEMS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|---|----------------|---------|----------|---------------------------|
| 3.7.1, Residual Heat Removal Service Water System | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.7.2, Diesel Generator Cooling Water System | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.7.3, Ultimate Heat Sink | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.7.4, Control Room Area Filtration System | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.7.5, Control Room Area Ventilation Air Conditioning System | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.7.6, Main Condenser Offgas | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.7.7, Main Turbine Bypass System | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.7 - PLANT SYSTEMS**

| | | | | |
|--|---------|---|------|--------------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.7.8, Spent Fuel Storage Pool Water Level | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.7.4, Sealed Source Contamination | | | | |
| None-R.1 | 3/4.7.4 | Sealed Source Contamination requirements. | TRM | 10 CFR 50.59 |
| | | | | |
| Current Specification 3/4.7.7, Area Temperature Monitoring | | | | |
| None-R.1 | 3/4.7.7 | Area Temperature Monitoring requirements. | TRM | 10 CFR 50.59 |
| | | | | |
| Current Specification 3/4.7.8, Structural Integrity of Class 1 Structures | | | | |
| None-R.1 | 3/4.7.8 | Structural Integrity requirements for Class 1 structures. | TRM | 10 CFR 50.59 |
| | | | | |
| Current Specification 3/4.7.9, Snubbers | | | | |
| NONE | NONE | NONE | NONE | NONE |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|--|----------------|---------|----------|---------------------------|
| 3.8.1, AC Sources - Operating | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.8.2, AC Sources - Shutdown | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.8.3, Diesel Fuel Oil and Starting Air | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.8.4, DC Sources - Operating | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.8.5, DC Sources - Shutdown | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.8.6, Battery Cell Parameters | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.8.7, Distribution Systems - Operating | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| | | | | |
|--|-----------|--|------|--------------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.8.8, Distribution Systems - Shutdown | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.8.3.1, AC Circuits Inside Primary Containment | | | | |
| None - R.1 | 3/4.8.3.1 | AC circuits inside primary containment requirements. | TRM | 10 CFR 50.59 |
| | | | | |
| Current Specification 3/4.8.3.2, Primary Containment Penetration Conductor Overcurrent Protective Devices | | | | |
| None - R.1 | 3/4.8.3.2 | Primary containment penetration conductor overcurrent protective devices requirements. | TRM | 10 CFR 50.59 |
| | | | | |
| Current Specification 3/4.8.3.3, Motor Operated Valves Thermal Overload Protection | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.9 - REFUELING OPERATIONS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|--|----------------|---------|----------|---------------------------|
| 3.9.1, Refueling Equipment Interlocks | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.9.2, Refuel Position One-Rod-Out Interlock | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.9.3, Control Rod Position | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.9.4, Control Rod Position Indication | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.9.5, Control Rod OPERABILITY - Refueling | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.9.6, RPV Water Level - Irradiated Fuel | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.9.7, RPV Water Level - New Fuel or Control Rods | | | | |

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.9 - REFUELING OPERATIONS

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|---|----------------------------|---|------------------------|---------------------------------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.9.8, Residual Heat Removal - High Water Level | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.9.9, Residual Heat Removal - Low Water Level | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.9.4, Decay Time | | | | |
| None-LA.1 NONE | 3/4.9.4 NONE | 24 hour decay time following subcriticality required prior to moving irradiated fuel in the reactor vessel. NONE | TRM NONE | 10 CFR 50.59 NONE |
| | | | | |
| Current Specification 3/4.9.5, Communications | | | | |
| None-R.1 | 3/4.9.5 | Communications requirements between the control room and refueling platform personnel. | TRM | 10 CFR 50.59 |
| | | | | |
| Current Specification 3/4.9.6, Crane and Hoist | | | | |
| None-R.1 | 3/4.9.6 | Cranes and hoists used for handling fuel assemblies or control rods requirements. | TRM | 10 CFR 50.59 |
| | | | | |

None
See
Format
6

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.9 - REFUELING OPERATIONS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|---|----------------|----------------------------|----------|---------------------------|
| Current Specification 3/4.9.7, Crane Travel | | | | |
| | | | | |
| None-R.1 | 3/4.9.6 | Crane travel requirements. | TRM | 10 CFR 50.59 |
| | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.10 - SPECIAL OPERATIONS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|--|----------------|---------|----------|---------------------------|
| 3.10.1, Reactor Mode Switch Interlock Testing | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.10.2, Single Control Rod Withdrawal - Hot Shutdown | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.10.3, Single Control Rod Withdrawal - Cold Shutdown | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.10.4, Single Control Rod Drive Removal - Refueling | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.10.5, Multiple Control Rod Withdrawal - Refueling | | | | |
| NONE | NONE | NONE | NONE | NONE |
| 3.10.6, Control Rod Testing - Operating | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.10.7, SDM Test - Refueling | | | | |
| NONE | NONE | NONE | NONE | NONE |

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.10 - SPECIAL OPERATIONS

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|--------------------------|----------------|---|----------|---------------------------|
| | | | | |
| NONE | | Current Specification 3/4.10.1, Primary Containment Integrity | | |
| None-M.1 | NONE | NONE | NONE | NONE |
| | | | | |
| NONE | | Current Specification 3/4.10.5, Oxygen Concentration | | |
| None-M.1 | NONE | NONE | NONE | NONE |
| | | | | |
| NONE | | Current Specification 3/4.10.6, Training Startups | | |
| None-M.1 | NONE | NONE | NONE | NONE |
| | | | | |
| NONE | | Current Specification 3/4.10.8, Suppression Chamber Water Temperature (Unit 1 only) | | |
| None-A.1 | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
CHAPTER 4.0 - DESIGN FEATURES**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|--------------------------|----------------|---------|----------|---------------------------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|---------------------------------------|----------------|---------|----------|---------------------------|
| 5.1, Responsibility | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 5.2, Organization | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 5.3, Unit Staff Qualifications | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 5.4, Procedures | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 5.5, Programs and Manuals | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 5.6, Reporting Requirements | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS**

| Current Specification 6.1.E/F, Training | | | | |
|--|------|------|------|------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 6.2.B, Radiation Protection Program | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 6.3, Reportable Event Action | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 6.4, Safety Limit Violation | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 6.5, Plant Operating Records | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 6.7, Process Control Program | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 6.9, Major Changes to Radioactive Waste Treatment System | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. _____ TO FACILITY OPERATING LICENSE NO. DPR-29
AND AMENDMENT NO. _____ TO FACILITY OPERATING LICENSE NO. DPR-30

EXELON GENERATION COMPANY, LLC

AND

MIDAMERICAN ENERGY COMPANY

QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2

DOCKET NOS. 50-254 AND 50-265

I. INTRODUCTION

Quad Cities Nuclear Power Station, Units 1 and 2 (Quad Cities), has been operating with Technical Specifications (TS), issued on June 28, 1996, that were developed during the Technical Specification Upgrade Program (TSUP), as amended from time to time. The TSUP was a partial adoption of the TS found in NUREG-0123, "Standard Technical Specifications General Electric Plants BWR/4," Revision 4. The TSUP was initiated as a result of findings by a Diagnostic Evaluation Team inspection performed at Dresden Nuclear Power Station (Quad Cities' sister site) in 1987.

By letter dated March 3, 2000, Exelon Generation Company, LLC (EGC, or the licensee, formerly Commonwealth Edison Company), proposed to amend the operating licenses for Quad Cities to completely revise the TS with new TS based on the following:

- NUREG-1433, "Standard Technical Specifications - General Electric Plants, BWR/4" Revision 1, of April 1995.
- "NRC Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (Final Policy Statement), published on July 22, 1993 (58 FR 39132).
- The current Quad Cities TS (6)

The overall objective of EGC's request, consistent with the Final Policy Statement, is to rewrite, reformat, and streamline TS consistent with 10 CFR 50.36.

Hereinafter, the proposed TS are referred to as the Improved TS (ITS), the existing Quad Cities TS are referred to as the Current TS (CTS), and the TS in NUREG-1433 are referred to as the Standard TS (STS). The corresponding TS Bases are ITS Bases, CTS Bases, and STS Bases, respectively.

ENCLOSURE 3

EGC retained portions of the CTS in the ITS in addition to basing the ITS on the STS and the Final Policy Statement. The NRC discussed plant-specific issues, including design features, requirements, and operating practices with EGC during a series of conference calls and meetings. In addition, EGC proposed generic changes that were not in the STS. The NRC staff asked EGC to submit such generic issues as proposed changes to the STS through the Nuclear Energy Institute's Technical Specifications Task Force (TSTF). These generic issues were considered for the Quad Cities ITS before evaluating them generically. EGC proposed transferring some CTS requirements to EGC-controlled documents as this was consistent with the Final Policy Statement. In addition, EGC used human factors principles to clarify CTS requirements being retained in the ITS and to define more clearly the appropriate scope of the ITS. Further, EGC proposed changes to the CTS Bases to make each ITS requirement clearer and easier to understand.

Since the licensee prepared the March 3, 2000, application, a number of amendments to the Quad Cities operating license were approved, as follows:

| Amendment No. (Unit 1, Unit 2) | Description of Change | Issue Date |
|-----------------------------------|--|------------|
| 196 192 | Remove Main Steam Line Radiation Monitor SCRAM and Isolation Functions | 10/13/2000 |
| 197 193 | Transfer of Operating License to EGC | 01/12/2001 |
| No., No | Increase Surveillance Test Interval and Allowed Outage Time for Assorted Instrumentation | date |

These amendments have been incorporated, as appropriate, into the ITS.

The March 3, 2000, application was supplemented by letters dated March 24, June 5, July 18, July 31, September 1, September 22, October 5, October 9, November 20, November 30, December 18, **date (revision D)**, and **date (license conditions)**. The NRC staff issued requests for additional information (RAIs) by letters dated June 21, July 3, August 18, August 31, September 12 and November 3, 2000.

In addition, the ITS conversion was supported by two other license amendment requests, dated August 30, 2000, which the licensee identified as being required to implement the ITS. One request related to the Emergency Diesel Generator Cooling Water Pump Allowed Outage Time, and the other changed the surveillance requirements for the Emergency Diesel Generator. The August 30, 2000, applications provided additional supporting information for changes that had already been incorporated into the March 3, 2000, application. The review of the August 30, 2000, applications is included in this safety evaluation.

The NRC published its proposed actions on EGC's application for amendment of March 3, 2000, in the *Federal Register* on **date (citation)** and **date (citation)**. This Safety Evaluation (SE) assesses EGC's application and supplemental information that resulted from NRC requests for information and discussions with EGC during the NRC staff's review. All ITS changes are within the scope of the actions described in the *Federal Register* notices.

The NRC staff relied on the Final Policy Statement and the STS as guidance for reviewing proposed deviations from the STS. This SE provides the basis for the NRC staff's conclusions that 1) EGC developed the ITS based on the STS as modified by plant-specific changes, and 2) using the Quad Cities ITS is acceptable for continued plant operation. It is acceptable that the ITS differs from STS, since the ITS reflects Quad Cities's current licensing basis. The NRC staff approves EGC's changes to their CTS with modifications documented in their revised submittals.

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

II. BACKGROUND

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

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

In 10 CFR 50.36, the Commission established its regulatory requirements for TS content. In doing so, the Commission emphasized those matters related to preventing accidents and mitigating accident consequences. The Commission noted that applicants were expected to incorporate into their TS "those items that are directly related to maintaining the integrity of the physical barriers designed to contain radioactivity" (see Statement of Consideration, "Technical Specifications for Facility Licenses; Safety Analysis Reports," of December 17, 1968 (33 FR 18610)).

10 CFR 50.36 requires that TS include items in the following five specific categories:

- (1) safety limits, limiting safety system settings and limiting control settings
- (2) limiting conditions for operation (LCOs)
- (3) surveillance requirements (SRs)
- (4) design features
- (5) administrative controls

However, the rule does not specify particular TS requirements.

For several years, NRC and industry representatives have tried to develop guidelines for improving nuclear power plant TS content and quality. On February 6, 1987, the Commission issued their "Interim Policy Statement on Technical Specification Improvements for Nuclear

Power Reactors" (52 FR 3788). During the period from 1989 to 1992, the utility Owners Groups and the NRC staff developed improved STS for each primary reactor type that would comply with the Commission's policy. In addition, the NRC staff, licensees, and Owners Groups developed a Writers Guide containing generic administrative and editorial guidelines for preparing TS. The Guide emphasized human factors principles, and EGC used it to develop their ITS.

In September 1992, the Commission issued the General Electric STS as NUREG-1433, which was developed using the guidance and criteria contained in the Commission's Interim Policy Statement. The General Electric STS are a model for developing ITS for General Electric plants. The results from applying the Interim Policy Statement criteria to generic system functions were published in a "Split Report" issued to the Nuclear Steam System Supplier (NSSS) Owners Groups in May 1988. The Interim Policy Statement criteria along with the Writer's Guide ensured that the ITS would consistently reflect system configurations and operating characteristics for all NSSS designs. In addition, the generic Bases provide a lot of information about the basis for the STS requirements.

On July 22, 1993, the Commission issued its Final Policy Statement indicating that satisfying the guidance in the policy statement also satisfies Section 182a of the Act and 10 CFR 50.36 (58 FR 39132). The Final Policy Statement described the STS safety benefits and encouraged licensees to use the STS as the basis for plant-specific TS amendments and for complete conversions to the ITS. Further, the Final Policy Statement gave guidance for evaluating the required scope of the ITS and defined the guidance criteria for determining which of the LCOs and associated surveillances should remain in the ITS. The Commission noted that, in allowing certain items to be relocated to licensee-controlled documents while requiring that other items be retained in the ITS, it was adopting the qualitative standard enunciated by the Atomic Safety and Licensing Appeal Board in Portland General Electric Company's hearing (Trojan Nuclear Plant), ALAB-531, 9 NRC 263, 273 (1979). There, the Appeal Board observed the following:

[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.

Using this approach, licensees should keep in the ITS existing LCO requirements that fall within or satisfy any of the Final Policy Statement criteria. Those LCO requirements that do not fall within or satisfy these criteria may be relocated to licensee-controlled documents. The Commission codified the four criteria in 10 CFR 50.36 (60 FR 36593, July 19, 1995). The Final Policy Statement criteria are as follows:

Criterion 1 — Installed instrumentation that is used to detect and indicate in the control room a significant abnormal degradation of the reactor coolant pressure boundary.

Criterion 2 — A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to fission product barrier integrity.

Criterion 3 — A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to fission product barrier integrity.

Criterion 4 — A structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.

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

III. EVALUATION

The NRC staff's review evaluates changes to CTS that fall into categories, defined by EGC, and includes an evaluation of whether existing regulatory requirements are adequate for controlling future changes to requirements removed from the CTS and placed in EGC-controlled documents.

The NRC staff's review of the March 3, 2000, submittal, as supplemented, identified the need for clarifications and additions to the submittal in order to establish an appropriate regulatory basis for translation of CTS requirements into ITS. Each change to the CTS proposed in the amendment request is identified as a discussion of change (DOC) to the CTS. EGC also provided justifications for deviation from the STS, as appropriate. The NRC staff comments were documented as requests for additional information (RAIs) and forwarded to EGC. EGC provided written responses to the NRC staff requests in supplemental letters indicated above. The docketed letters clarified and revised EGC's basis for translating CTS requirements into ITS. The NRC staff finds that EGC's submittals provide sufficient detail to allow the staff to reach a conclusion regarding the adequacy of EGC's proposed changes.

EGC's license amendment application categorized CTS changes as follows:

- Administrative Changes, (A), i.e., non-technical changes in existing CTS requirements.
- Technical Changes - More Restrictive, (M), i.e., new or additional CTS requirements.
- Technical Changes - Less Restrictive (specific), (L), i.e., deleting or relaxing CTS requirements.
- Technical Changes - Less Restrictive Relocated Requirements (generic), (LA), i.e., relocation of details out of the CTS and into licensee-controlled documents

out of the CTS and into licensee-controlled documents

- Technical Changes - Less Restrictive (generic), (LB), i.e., extending an instrument completion time or surveillance frequency according to approved vendor topical reports (not used for Quad Cities)
- Technical Changes - Less Restrictive, (LC), i.e., eliminating instrumentation requirements for alarm and indication only functions. (not used for Quad Cities)
- Technical Changes - Less Restrictive, (LD), i.e., extending CTS surveillance intervals to 24 months from 18 months for items other than Channel Calibrations
- Technical Changes - Less Restrictive, (LE), i.e., extending CTS surveillance intervals to 24 months from 18 months for Channel Calibrations.
- Technical Changes - Less Restrictive, (LF), i.e., use of revised methodologies for determining Allowable Values and instrument setpoints, and analyzing channel/instrument performance to ensure that the design basis and associated safety limits will not be exceeded during plant operation.
- Relocated Specifications, (R), i.e., relaxations in which whole specifications are removed from the CTS and placed in EGC-controlled documents

due to the specifications not meeting criteria of 10 CFR 50.36

The changes that are in the ITS conversion for Quad Cities are listed in the following tables attached to this SE:

- Table A of Administrative Changes to the CTS
- Table M of More-Restrictive Changes to the CTS
- Table L of Less-Restrictive Changes to the CTS (includes L, LD, LE, and LF categories)
- Table LA of Less-Restrictive, Relocated Requirements Changes to the CTS
- Table R of Relocated Specifications

The tables are only meant to summarize the changes being made to the CTS. The details, as to what the actual changes are and how they are being made to the CTS or ITS, are only provided in the licensee's application and supplemental letters.

The general categories of changes to the CTS requirements are described in more detail below.

A. Administrative Changes (A)

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

- 1 Providing the appropriate numbers, etc., for STS bracketed information (information that must be supplied on a plant-specific basis and that may change from plant to plant).

Not part
of CTS
markups
It is in
JFD

- 2 Identifying plant-specific wording for system names, etc.
- 3 Changing the wording of specification titles in the CTS to conform to STS.
- 4 Splitting up requirements currently grouped under a single current specification to more appropriate locations in two or more specifications of ITS.
- 5 Combining related requirements currently presented in separate specifications of the CTS into a single specification of ITS.

Table A lists the administrative changes proposed in ITS. Table A is organized by the corresponding ITS section DOC, and provides a summary description of the administrative change that was made, and CTS and ITS LCO references. The NRC staff reviewed all of the administrative and editorial changes proposed by EGC and finds them acceptable because they are compatible with the Writers Guide and STS, do not result in any substantive change in operating requirements, and are consistent with the Commission's regulations.

B. Technical Changes — More Restrictive (M)

EGC, in electing to implement the specifications of STS proposed a number of requirements more restrictive than those in the CTS. ITS requirements in this category include requirements that are either new, more conservative than corresponding requirements in the CTS, or have additional restrictions that are not in the CTS but are in the STS. Examples of more restrictive requirements are placing an LCO on plant equipment which is not required by the CTS to be operable, adopting more restrictive requirements to restore inoperable equipment, and adopting more restrictive SRs. Table M lists all the more restrictive changes proposed in ITS. Table M is organized by the corresponding ITS section DOC and provides a summary description of the more restrictive change that were adopted along with CTS and ITS LCO references. These changes are additional restrictions on plant operation that enhance safety. The staff reviewed these changes and found them to be acceptable.

C. Technical Changes — Less Restrictive (L, LD, LE and LF)

L, LD, LE and LF technical changes are grouped here to simplify discussion of the broad range of proposed less restrictive changes in technical requirements. L is used to designate a CTS change that requires a unique discussion. LD, LE and LF are used to identify a recurring change evaluated by a single discussion in the submittal. Less restrictive requirements include deletions and relaxations to portions of CTS requirements that are not being retained in ITS relocated to an EGC-controlled document. When requirements have been shown to give little or no safety benefit, their relaxation or removal from the TS may be appropriate. In most cases, relaxations previously granted to individual plants on a plant-specific basis were the result of (1) generic NRC actions, (2) new staff positions that have evolved from technological advancements and operating experience, or (3) resolution of the Owners Groups' comments on STS. The NRC staff reviewed generic relaxations contained in the STS and found them acceptable because they are consistent with current licensing practices and the Commission's

- 5 Deletion of TS whose applicability has expired.
- 6 Presentation changes that involve rewording or reformatting for clarity but which do not involve a change in requirements.
- 7 Deletion of redundant TS requirements that exist elsewhere in the TS.
- 8 Wording changes and interpretation and practice, and that more clearly or explicitly state existing requirements.

regulations. The Quad Cities design was also reviewed to determine if the specific design basis and licensing basis are consistent with the technical basis for the model requirements in the STS and thus provide a basis for ITS.

A significant number of changes to the CTS involved deletions and relaxations to portions of CTS requirements evaluated as Categories 1 through 10 that follow:

- Category 1 — Relaxation of LCO Requirements *(the of)*
- Category 2 — Relaxation of Applicability *(of)*
- Category 3 — Relaxation of Surveillance Requirement
- Category 4 — Relaxation of Required Action Detail
- Category 5 — Relaxation of Required Actions to Exit Applicability
- Category 6 — Relaxation of Completion Time
- Category 7 — Allow Mode Changes When LCO Not Met
- Category 8 — Elimination of Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
- Category 9 — Elimination of CTS Reporting Requirement
- Category 10 — Relaxation of Surveillance Frequency from 18 months to 24 months

The following discussions address why the various categories of changes are acceptable.

Category 1 - Relaxation of the LCO Requirements

Certain CTS LCOs contain operational and system parameters beyond those necessary to meet safety analysis assumptions and therefore are considered overly restrictive. CTS also contain limits which have been shown to give little or no safety benefit to the safe operation of the plant. The ITS, consistent with the guidance in the STS, delete or revise operating limits in this category. CTS LCO changes included in this category are: (1) revising setpoints to be consistent with instrument setpoint methodologies; (2) deleting or revising operational limits to establish requirements consistent with applicable safety analyses; (3) deleting equipment or systems which establish redundant system capability beyond that assumed to function by the applicable safety analyses or which are implicit to the ITS requirement for systems, components and devices to be operable; and (4) adding allowances to use administrative controls on plant devices and equipments during times when automatic control is required or to establish temporary administrative limits, as appropriate, to allow time for systems to establish equilibrium operation.

TS changes represented by these categories of requirements allow operators to more clearly focus on issues important to safety. The resultant ITS LCOs maintain an adequate degree of protection consistent with the safety analysis. They also improve focus on issues important to safety and provide reasonable operational flexibility without adversely affecting the safe operation of the plant. These changes are consistent with STS and are acceptable.

Category 2 - Relaxation of Applicability

The CTS require compliance with the LCO during the Operational Mode(s) or other conditions specified in the LCO Applicability statement. Five Operating Modes are defined by TS according to average reactor coolant temperature, and the position of the reactor mode switch located in the control room; Power Operation, Startup, Hot Shutdown, Cold Shutdown and

when fuel is in the reactor vessel

and reactor vessel head closure bolt tensioning

Refueling. When CTS Applicability requirements are inconsistent with the applicable accident analyses assumptions for a system, subsystem or component specified in the LCO, the LCO is changed in the ITS to establish a consistent set of requirements. These modifications or deletions are acceptable because, during the conditions referenced in the ITS, the operability requirements are consistent with the applicable safety analyses. These changes are consistent with STS and are acceptable.

Category 3 - Relaxation of Surveillance Requirement

CTS require maintaining the LCO equipment operable by meeting the SRs in accordance with the specified SR Frequency. This requires conducting tests to demonstrate equipment is operable, or that LCO 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 in this category relate to relaxation of CTS SR acceptance criteria and/or the conditions for performing the SR.

Relaxing the SR acceptance criteria for these items provides operational flexibility consistent with the objective of the STS without reducing confidence that the equipment is operable. The ITS also permits the use of an actual, as well as a simulated, actuation signal to satisfy SRs for automatically actuated systems. TS required features cannot distinguish between an "actual" signal and a "test" signal. The changes to TS acceptance criteria are acceptable because appropriate testing standards are retained for determining that the LCO-required features are operable.

Relaxing conditions for performing SRs include, for example, not requiring testing of de-energized equipment (e.g., instrumentation Channel Checks) or equipment that is already performing its intended safety function (e.g., position verification of valves locked in their safety actuation position). The changes also include the allowance to verify the position of valves in high radiation areas by administrative means. ITS administrative controls (ITS 5.7) regarding access to high radiation areas make the likelihood of mispositioning valves small. These changes are acceptable because the changes do not affect the ability to determine whether equipment is capable of performing its intended safety function.

These relaxations of CTS SRs optimize test requirements for the affected safety systems and increase operational flexibility. These changes are consistent with STS and are acceptable.

Category 4 - Relaxation of Required Action Detail

LCOs are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When an LCO is not met, CTS specify actions to be taken until the equipment is restored to its required capability or performance level, or remedial measures are established. In revising the Required Actions, details are deleted or options are added such that resulting ITS actions continue to provide measures that conservatively compensate for the inoperable equipment. Furthermore, adopting STS action requirements results in simpler, more concise and more direct action requirements. This allows more effective use of operator resources for placing and maintaining the reactor in a safe condition when the LCO is not met. These changes are consistent with STS and are acceptable.

to exit Applicability

Category 5 - Relaxation of Required Actions

LCOs are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When an LCO is not met, CTS specify actions to be taken until the equipment is restored to its required capability or performance level, or remedial measures are established. Compared to CTS required actions, the ITS actions result in extending the time period for taking the plant outside the applicability into shutdown conditions. For example, changes in this category include providing an option to: isolate a system, place equipment in the state assumed by the safety analysis, satisfy alternate criteria, take manual actions in place of automatic actions, "restore to operable status" within a specified time frame, place alternate equipment into service, or use more conservative TS setpoints. The resulting ITS actions continue to provide measures that conservatively compensate for the inoperable equipment. The ITS actions are commensurate with safety importance of the inoperable equipment, plant design and industry practice and do not compromise safe operation of the plant. These changes are consistent with STS and are acceptable.

Category 6 - Relaxation of Completion Time

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

Incorporating completion time extensions is acceptable because completion times take into account the operability status of the redundant systems of TS-required features, the capacity and capability of remaining features, a reasonable time for repairs or replacement of required features, vendor-developed standard repair times, and the low probability of a design basis accident (DBA) occurring during the repair period. These changes are consistent with STS, and allowed outage time extensions specified as Category 6 are acceptable.

Category 7 - Allow Mode Changes When LCO Not Met

other

CTS 3.0.D (ITS 3.0.4) precludes entry into the applicable Mode or specified conditions while relying on the Actions, even though the Actions are designed to provide for safe operation of the plant. Unless otherwise stated, LCO 3.0.4 is always applicable to ITS LCO Actions. However, ITS adds a Note to certain Actions stating "LCO 3.0.4 is not applicable." The addition of this Note allows transition between Applicability Modes or other specified conditions with the LCO not met (i.e., relying on the Actions) even though the Actions may require plant shutdown. The addition of "LCO 3.0.4 is not applicable" notes does not impact normal operation of the plant for the specified LCO features and would not provide additional initiators for plant transients during the Mode or other specified conditions. This exception to ITS 3.0.4 is acceptable due to the passive function or the installed redundancy of the features, the plant conditions that apply to the Note, and the low probability of an event requiring the inoperable features. These changes are consistent with STS and are acceptable.

NRC

Not needed - Also, you can be in Refuel Mode with the mode switch in Shutdown, per ITS Table 1.1-1

Category 8 - Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel

or Refuel among other requirements or Refuel may cause

Some CTS LCOs and Actions specify "lock" the mode switch in "Shutdown" (shutdown/position) or "Refuel" (refueling position). Other CTS Action requirements also specify placing the reactor in the shutdown or refueling Mode without requiring the mode switch to be "locked." The requirement to "lock" the mode switch in Shutdown or Refueling is not retained in the ITS. CTS Table 1-2, "Operational Modes" (ITS Table 1.1-1) defines reactor operational Modes based on the reactor mode switch position and on average reactor coolant temperature. Moving a reactor mode switch from Shutdown into a position other than Shutdown causes a Mode change as defined by TS, and results in associated TS compliance requirements for the LCOs that become applicable in the new Mode. CTS 3.0.A (ITS 3.0.4) precludes changes in reactor Modes without all TS required equipment operable. Thus, ITS 3.0.4 is an administrative requirement put in place to prevent movement of the reactor mode switch between positions without first ensuring TS required equipment is operable, and changing the mode switch from the required position is adequately controlled by ITS Table 1.1-1 without adding a requirement to "lock" the mode switch. These changes are consistent with the STS and are acceptable.

Category 9 - Elimination of CTS Reporting Requirement

CTS include requirements to submit special reports to the NRC when specified limits or conditions are not met. Typically, the time period for the report to be issued is "within 30 days." However, the ITS eliminates the TS requirements for special reports and instead relies on the reporting requirements of 10 CFR 50.73. The changes to the reporting requirements are acceptable because 10 CFR 50.73 provides adequate reporting requirements, and the special reports do not affect continued plant operation.

CTS also include requirements for reports to be made to the NRC on data gathered as part of routine plant programs. These requirements are removed from the ITS. The requirement to report test frequency changes that occur due to consecutive SR failures has been deleted since the test schedule is already covered by the TS. In addition, a historical review has shown the SR has never failed.

Deleting TS reporting requirements reduces unnecessary regulatory burden on the plant and allows licensee efforts to be concentrated on maintaining TS required limits. These changes are consistent with the STS and are acceptable.

Category 10 - Relaxation of Surveillance Frequency from 18 months to 24 months (LD, LE and)

CTS require maintaining the LCO equipment operable by conducting SRs in accordance with the specified SR Frequency. The changes in this category relate to extending SR frequencies. Improved reactor fuels allow the licensee to consider an increase in the duration of the fuel cycle for their facility. TS that specify an 18-month surveillance interval are changed to specify a 24-month interval. The CTS 4.0.B (ITS SR 3.0.2) provision to extend surveillances by 25 percent of the specified interval would extend the time limit for completing these surveillances from the CTS limit of 22.5 months to a maximum of 30 months. The staff review of these items is covered in more detail in Section G of this SE. These changes are consistent with the STS and are acceptable.

NRC

Need to somehow identify that this is end of Category 10

Table L includes all L, LD, LE, and LF changes and is organized by ITS section. The table specifies: the section designation; a summary description of the change; CTS and ITS LCO references; a reference to the specific change category as discussed above; and a characterization of the DOC.

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

D. Technical Changes — Less Restrictive Relocated Requirements (Not Entire Specifications) (LA)

NRC

We use LA's to relocate entire specs that meet the criteria of 10 CFR 50.36

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

- Type 1 Details of System Design and System Description including Design Limits
- Type 2 Descriptions of Systems Operation
- Type 3 Procedural Details for Meeting TS Requirements, Reporting Requirements, and Specification Requirements

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

(including the Technical Requirements Manual (TRM))

Type 1 Details of System Design and System Description Including Design Limits

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

(including the TRM)

(including TRM)

appropriate. Cycle-specific design limits are contained in the Core Operating Limits Report (COLR). ITS Administrative Controls include the programmatic requirements for the COLR.

Type 2 Descriptions of Systems Operation

The plans for the normal and emergency operation of the facility are required to be described in the UFSAR by 10 CFR 50.34. ITS 5.4.1.a requires written procedures to be established, implemented, and maintained for plant operating procedures including procedures recommended in Regulatory Guide (RG) 1.33, Revision 2, Appendix A, February 1978. Controls specified in 10 CFR 50.59 apply to changes in procedures as described in the UFSAR. The ITS Bases also contain descriptions of system operation. It is acceptable to remove details of system operation from the TS because this type of information will be adequately controlled in the UFSAR, plant operating procedures, and the TS Bases, as appropriate.

Only
moved
to BASES

Type 3 Procedural Details for Meeting TS Requirements, Reporting Requirements, and Specification Requirements

Details for performing TS Actions and SRs are more appropriately specified in the plant procedures required by ITS 5.4.1, the UFSAR, and ITS Bases. For example, control of the plant conditions appropriate to perform a surveillance test is an issue for procedures and scheduling and has previously been determined to be unnecessary as a TS restriction. As indicated in GL 91-04, allowing this procedural control is consistent with the vast majority of other SRs that do not dictate plant conditions for surveillances. Prescriptive procedural information in an Action requirement is unlikely to contain all procedural considerations necessary for the plant operators to complete the actions required, and referral to plant procedures is therefore required in any event. Other changes to procedural details include those associated with limits retained in the ITS. For example, the ITS requirement may refer to programmatic requirements such as COLR, included in ITS Section 5.5, which specifies the scope of the limits contained in the COLR and mandates NRC approval of the analytical methodology. (6)

Relocating specification requirements, including LCO, required actions, and surveillance requirements, have been made in adopting the STS. For example, for certain power operated isolation valves that do not receive an automatic isolation signal and for which the closure time is not assumed in the safety analysis, requirements for periodic testing of these valves are moved to the procedures that implement the inservice testing program (10 CFR 50.55a). Support system specification requirements for other equipment with its own specifications are moved to the TRM. The definition of operability provides sufficient assurance that the supporting system can perform its required support function. (including the TRM)

NRC
Need to
discuss
process
for ODCM,
ISI program
and
QA manual

The removal of these kinds of procedural details from the CTS is acceptable because they will be adequately controlled in the UFSAR, plant procedures, Bases, and COLR, as appropriate. This approach provides an effective level of regulatory control and provides for a more appropriate change control process. Similarly, movement of reporting requirements from LCOs to licensee-controlled documents is appropriate because ITS 5.6, 10 CFR 50.36 and 10 CFR 50.73 adequately cover the reports deemed to be necessary.

Not
in
LA
DOCS

Table LA consists of LA changes. Table LA lists CTS specifications and describes the information that is removed from individual specifications and deleted or relocated to EGC-controlled documents. Table LA is organized by ITS section and includes the following: a DOC identification number referenced to ITS Section; a CTS reference; a summary description of the requirement; the document that retains the CTS requirements; and the specific change type, as discussed above.

The NRC staff has concluded that these types of detailed information and specific requirements are not necessary in the ITS to ensure the effectiveness of ITS to adequately protect the health and safety of the public. Accordingly, these requirements may be ~~deleted or~~ moved to one of the following EGC-controlled documents for which changes are adequately governed by a regulatory or TS requirement:

- (1) TS Bases controlled by ITS 5.5.14, "Technical Specifications Bases Control Program."
- (2) UFSAR (includes the Technical Requirements Manual (TRM) by reference) controlled by 10 CFR 50.59.
- (3) ODCM controlled by ITS 5.5.1, "Offsite Dose Calculation Manual."
- (4) QA Manual controlled by 10 CFR 50.54.
- (5) Inservice Testing Program controlled by ITS 5.5.6, "Inservice Testing Program."
- (6) Inservice Inspection program controlled by 10 CFR 50.55a.
- (7) Core Operating Limits Report controlled by ITS 5.6.5, "Core Operating Limits Report (COLR)."

<Delete the space>

and
10 CFR 50.55a.

To the extent that requirements and information have been relocated to EGC-controlled documents, such information and requirements are not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety. Further, where such information and requirements are contained in LCOs and associated requirements in the CTS, the NRC staff has concluded that they do not fall within any of the four criteria in the Final Policy Statement (discussed in Part II of this SE). Accordingly, existing detailed information and specific requirements, such as generally described above, may be deleted from the CTS.

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 may be relocated from CTS (an NRC-controlled document) to appropriate licensee-controlled documents. These requirements include the LCOs, Action Statements (Actions), and associated SRs. EGC proposed, in accordance with the criteria in the Final Policy Statement, to entirely remove certain TS from the CTS and place them in EGC-controlled documents. The staff has reviewed EGC's submittals, and finds that relocation of these requirements to licensee-controlled documents (described above) is acceptable in that changes to these documents will be adequately controlled by 10 CFR 50.59 and other regulations (described above). 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 lists all specifications that are relocated, based on the Final Policy Statement, to EGC-controlled documents. Table R provides: a DOC identification number referenced to ITS Section; a CTS reference; a summary description of the requirement; the name of the document that retains the CTS requirements; and the method for controlling future changes to relocated requirements. The NRC staff evaluation of each relocated specification and specific CTS detail presented in Table R is provided below.

3/4.2.E Control Rod Block Actuation

The CTS requires the control rod block actuation channels shown in Table 3.2.E-1 to be operable with their trip setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.2.E-1. Several control rod block actuation functions are relocated to the TRM.

3/4.2.E.2 Average Power Range Monitors (APRM)

The APRM control rod block instrumentation is installed to prevent conditions that would otherwise require actuation of the RPS if plant conditions were allowed to persist, such as during a "control rod withdrawal error at power." The APRMs use LPRM signals to provide information about the average core power and to create the APRM rod block signal. However, the rod block function of the APRMs is not used to mitigate a DBA or transient.

3/4.2.E.3 Source Range Monitors (SRM)

The SRM control rod block instrumentation is installed to monitor neutron flux during refueling, shutdown, and startup conditions. When IRMs are not above Range 2, the SRM control rod block prevents a control rod withdrawal if the count rate exceeds a preset value or falls below a preset limit. However, the rod block signals initiated by the SRMs are not used to mitigate a DBA or transient.

3/4.2.E.4 Intermediate Range Monitors (IRM)

The IRM control rod block instrumentation is installed to monitor the neutron flux levels during refueling, shutdown, and startup conditions. The IRM control rod block prevents a control rod withdrawal if the IRM reading exceeds a preset value, or if the IRM is inoperable. However, the rod block signals initiated by the IRMs are not used to mitigate a DBA or transient.

3/4.2.E.5 Scram Discharge Volume (SDV)

The Scram Discharge Volume (SDV) control rod block instrumentation uses signals derived from SDV level monitors to prevent control rod withdrawals when accumulated water reaches a pre-set level in the SDV. This instrumentation ensures there is sufficient volume remaining in the SDV to contain the water discharged by the control rod drives during a scram, thus ensuring that the control rods will be able to insert fully. This rod block signal also provides an indication to the operator that water is accumulating in the SDV and prevents further rod withdrawals. With continued water accumulation, a reactor protection system initiated scram signal will occur. Thus, the SDV water level rod block signal provides an opportunity for the operator to take action to avoid a reactor scram. However, the rod block signals initiated by the SDV instrumentation is not used to mitigate a DBA or transient.

3/4.2.F

Accident Monitoring Instrumentation

non-Category 1

All Regulatory Guide 1.97 non-Type A instruments ~~and all Regulatory Guide 1.97 non-Category 1 instruments~~ specified in the plant's Safety Evaluation Report (SER) on Regulatory Guide 1.97 are relocated to the TRM. The CTS require the accident monitoring instrumentation channels shown in Table 3.2.F-1 to be operable. Accident monitoring instrumentation is provided to monitor variables and systems over their anticipated ranges for accident conditions as appropriate to ensure adequate safety during and following accidents. These variables are used by the control room operating personnel to perform their role in the emergency plan in the evaluation and assessment, monitoring and execution of control room functions when other emergency response facilities are not effectively manned.

The NRC staff documented deterministic screening criteria for post-accident monitoring instrumentation in letter dated May 7, 1988, from T.E. Murley (NRC) to R.F. Janecsek (BWROG). The staff requires all plant-specific Regulatory Guide 1.97 Type A instruments specified in the plant's Safety Evaluation Report (SER) on Regulatory Guide 1.97, and all Regulatory Guide 1.97 Category 1 instruments to be included in ITS. Accordingly, this position has been applied to the ~~Dresden 2 and 3~~ Regulatory Guide 1.97 instruments.

Quad Cities Land 2

The CTS accident monitoring instruments that do not meet the RG 1.97 deterministic criteria and which are relocated include: Drywell air temperature, safety and relief valve position indicators - acoustic and temperature, neutron monitoring (source range), and torus air temperature. Those instruments meeting the criteria are retained by the ITS criteria.

3/4.2.H

Explosive Gas Monitoring Instrumentation

Explosive gas monitoring instrumentation are relocated to the TRM. The CTS require explosive gas monitoring instrumentation channels shown in Table 3.2.H-1 to be operable with their Alarm/Trip setpoints set to ensure that the limits of specification 3.8.H are not exceeded. The explosive gas monitoring instrumentation monitors the gaseous radwaste treatment system process for potentially explosive gas mixtures to ensure that hydrogen concentration is maintained below the flammability limit. However, the offgas system is designed to contain detonations without affecting safety-related equipment functions. Neither the concentration of hydrogen in the offgas stream, nor the instrumentation used to monitor the hydrogen concentration are an initial assumption of any design basis accident (DBA) or transient analysis.

3/4.2.I

Suppression Chamber and Drywell Spray Actuation

Suppression chamber and drywell spray actuation instrumentation are relocated to the TRM. CTS require the suppression chamber and drywell spray actuation instrumentation channel(s) shown in Table 3.2.I-1 to be operable with their trip setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.2.I-1. The suppression chamber and drywell spray actuation instrumentation preclude inadvertent actuation of containment and suppression pool sprays during a LOCA. In the presence of a LOCA signal, the spray valves can not open unless 1) the reactor vessel water level is above the 2/3 core height level, to preclude diversion of LPCI when water inventory is needed for core flooding, and 2) the drywell pressure is between 0.5 psig and 1.5 psig, to ensure a line break is detected.

①

②

a valid need for operating Drywell and Suppression chamber Sprays

Quad Cities Land 2

The operability of the suppression chamber and drywell spray actuation instrumentation does not affect the operability of LPCI. If either of the two instruments trip too soon, the other instrument Function still ensures that flow is not diverted away from core flooding. While tripping of both the instruments allow the permissives for opening drywell and suppression pool spray valves to be met, inadvertent operation does not automatically result, since manual actions must still be taken to open the valves. In addition, if a LOCA signal is not present, this instrumentation does not preclude operation of the drywell and suppression pool spray valves. Therefore, inadvertent operation of drywell spray has been analyzed at Dresden 2 and 3 (applicable to Quad Cities?) and does not result in containment failure due to operation of the reactor building-suppression chamber and the suppression chamber-drywell vacuum breakers. These vacuum breakers are controlled by both CTS and ITS. Therefore, operability of the Drywell Spray System and the Suppression Chamber Spray System are not impacted.

If the instruments trip too late or not at all, then no flow can be diverted by the drywell and suppression chamber sprays; thus LPCI is not affected. The only Technical Specification system affected in this case are the Drywell Spray System and the Suppression Chamber Spray System. A failure of the instrumentation to function would preclude the spray valves from being opened from the control room. However, these systems are manually controlled systems that are not needed for a minimum of 10 minutes following a DBA LOCA, and the valves could still be opened locally at the valve operator. In addition, the instruments could be overridden to allow operation from the control room. Therefore, operability of these instruments are not an initial assumption of any design basis accident (DBA) or transient analysis.

3/4.2.K Toxic Gas Monitoring

The Toxic Gas Monitoring System is relocated to the TRM. CTS require the toxic gas monitoring system to be operable with their alarm/trip setpoints adjusted to actuate at an ammonia concentration of less than or equal to 50 ppm. This system ensures sufficient capability is available to promptly detect and initiate protective action in the event of an accidental ammonia release. This capability protects control room personnel; however, the instruments are not assumed to mitigate a design basis accident (DBA) or transient since an accidental ammonia release is not a DBA or transient.

3/4.3.N Economic Generation Control System

requirements

The Economic Generation Control System limits are relocated to the TRM. CTS 3/4.3.N specify that the economic generation control system (EGCS) may be in operation with automatic flow control provided that core flow is $\geq 65\%$ and $\leq 100\%$ of rated core flow, and thermal power is $\geq 20\%$ of rated thermal power. The system was designed to allow the load dispatcher to control power output of the station within appropriate limits based on reactor operating conditions. These EGCS limiting conditions for operation were chosen to be well within the analyzed system setpoints utilized in design basis accident (DBA) and transient analyses; however, the EGCS limits do not rely on any assumptions used in DBA or transient analyses. The requirements of the EGCS LCO do not meet the requirements for TS and have been relocated to the TRM.

are not relied upon

3/4.6.N Structural Integrity

The CTS requirements that the structural integrity of ASME Code Class 1, 2 and 3 components (pumps and valves) be maintained operable in accordance with Specification 4.6.N are relocated to the TRM. Specification 4.6.N establishes the programmatic elements for conducting ASME Code Class 1, 2, and 3 component inspections by reference to Section XI of the ASME Boiler and Pressure Vessel Code. The safety basis for establishing programmatic requirements on structural integrity in CTS relate to prevention of component degradation and continued long term maintenance of acceptable structural conditions. Therefore, structural integrity of safety systems are not operational limits that are an initial assumption of any design basis accident (DBA) or transient analysis.

3/4.7.L Drywell Spray

CTS require the Drywell Spray function of the low pressure coolant injection (LPCI)/containment cooling systems to be operable with two independent subsystems, each subsystem consisting of one operable LPCI pump, and an operable flow path capable of recirculating water from the suppression pool through a heat exchanger and the drywell spray nozzles. These requirements are relocated to the TRM.

The drywell spray function of the LPCI/containment cooling systems is utilized in post-LOCA conditions to condense steam in the drywell, thereby further lowering containment pressure. Emergency operating procedures direct manual initiation of the drywell spray function of the LPCI/containment cooling systems. However, in the analysis of the bounding event for containment pressurization due to the DBA, the drywell spray function of the LPCI/containment cooling systems was not utilized for mitigation of the event. The drywell spray function is not required for proper performance of the containment pressure suppression system and is not an initial assumption of any design basis accident (DBA) or transient analysis.

3/4.8.E Flood Protection

Flood protection requirements are relocated to the TRM. Flood protection shall be available for all required safe shutdown systems, components and structures. This Technical Specification has provisions for high river level. A high river water level is a preliminary indication of flood conditions. Flooding is not a design basis accident (DBA) or transient. In addition, flooding is not postulated to occur during any DBA or transient, thus river water level (as it pertains to flooding) is not credited in any safety analysis. The Flood Protection Technical Specification requirements were put in place to ensure that facility protective actions will be taken and operation will be terminated in the event of flood conditions. This requirement is adequately controlled in plant emergency procedures.

3/4.8.G Sealed Source Contamination requirements

Sealed Source Contamination ~~limits~~ are relocated to the TRM. CTS specifies removable contamination limits for sealed sources. Each sealed source containing radioactive material in excess of 100 microcuries of either beta or gamma emitting material or 5 microcuries of alpha emitting material shall be free of ≥ 0.005 microcuries of removable contamination. These limits ensure that the total body or individual organ irradiation doses do not exceed ingestion or inhalation limits. This TS requirement and the associated Surveillance Requirements do not

relate to the operational conditions or limitations that are necessary to ensure safe reactor operation. Sealed source contamination limits are not an initial assumption of any design basis accident (DBA) or transient analysis.

3/4.10.E Communications

Communication requirements are relocated to the TRM. CTS specify that direct communications are to be maintained between the control room and refueling platform personnel to ensure that refueling personnel can be promptly informed of significant changes in the plant status or core reactivity condition during refueling operations. Communications between control room and refuel platform personnel are necessary for coordinating activities such as the insertion of control rods prior to loading fuel. However, operable control room communications with refueling platform personnel is not an assumption for response to refueling system failures, or design accident or transient response.

The relocated CTS discussed above are not required to be in the TS under 10 CFR 50.36 and do not meet any of the four criteria in the Final Policy Statement. They are not needed to obviate the possibility that an abnormal situation or event will give rise to an immediate threat to the public health and safety. In addition, the NRC staff finds that sufficient regulatory controls exist under the regulations cited above to maintain the effect of the provisions in these specifications. The NRC staff has concluded that appropriate controls have been established for all of the current specifications, information, and requirements that are being moved to EGC-controlled documents. This is the subject of a license condition established herewith.

TRM
Until incorporated in the UFSAR and procedures, changes to these specifications, information, and requirements will be controlled in accordance with the applicable current procedures that control these documents. Following implementation, the NRC will audit the removed provisions to ensure that an appropriate level of control has been achieved. The NRC staff has concluded that, in accordance with the Final Policy Statement, sufficient regulatory controls exist under the regulations, particularly 10 CFR 50.59. Accordingly, these specifications, information, and requirements, as described in detail in this SE, may be relocated from CTS and placed in the UFSAR or other EGC-controlled documents as specified in EGC's letter of date.

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

The facility and procedures described in the UFSAR and TRM, incorporated into the UFSAR by reference, can only be revised in accordance with the provisions of 10 CFR 50.59, which ensures records are maintained and establishes appropriate control over requirements removed from CTS and over future changes to the requirements. Other licensee-controlled documents contain provisions for making changes consistent with other applicable regulatory requirements: for example, the ODCM can be changed in accordance with ITS 5.5.1; the emergency plan implementing procedures (EPIPs) can be changed in accordance with 10 CFR 50.54(q); and the administrative instructions that implement the QA Plan can be changed in accordance with 10 CFR 50.54(a) and 10 CFR Part 50, Appendix B. Temporary procedure changes are also controlled by 10 CFR 50.54(a). The documentation of these changes will be maintained by EGC in accordance with the record retention requirements specified in EGC's QA plan for Quad Cities and such applicable regulations as 10 CFR 50.59.

The license condition for the relocation of requirements from the CTS addresses the implementation of the ITS conversion and when the relocation of the CTS requirements into licensee-controlled documents will be completed. The submittal of the updated licensee-controlled documents (e.g., UFSAR) to the Commission will be as required by, and in accordance with, the regulations (e.g., 10 CFR 50.71(e) for the updated UFSAR), and not be as part of the implementation of the ITS.

G. Other TS Changes Included in the Application

This section evaluates other TS changes included in EGC's ITS conversion application. These include items which deviate from both the CTS and the STS, do not fall clearly into a category, or are in addition to those changes that are needed to meet the overall purpose of the conversion.

Conversion to ITS Section 3.6.1.3

moved CTS 4.7.A.2 verifies that all penetrations not capable of being closed by automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges or deactivated automatic valves secured in their position, except as provided in CTS 3.7.D. In the ITS, this surveillance is ~~relocated~~ from the CTS Primary Containment Integrity specification (CTS 3/4.7.A) to the ITS Primary Containment Isolation Valve Specification (ITS 3.6.1.3) and broken up into two specifications - one for valves and blind flanges outside containment and one for valves and blind flanges inside containment. During the review of the licensee's submittal, a difference of opinion arose between the staff and the licensee as to what would constitute a failure of this CTS surveillance and what appropriate actions should be taken. The staff concedes that the wording and structure of the Quad Cities CTS would allow several interpretations of how CTS 4.7.A.2 is to be met, what actions to take if the surveillance is not met, and which ITS Action Notes are implied by the CTS wording in CTS 3/4.7.A. Depending on the interpretation, the change from the CTS to the ITS could be characterized as Administrative, More Restrictive, Less Restrictive, or a combination thereof.

In addition, the staff concedes that there are several interpretations of how CTS 3.6.M Action and 3.7.D Action 1 can be applied to penetrations with one primary containment isolation valve. One interpretation would require an immediate shutdown since there is no other OPERABLE isolation valve. Another interpretation considers the closed system boundary as the other OPERABLE isolation valve. Depending on which interpretation is used, the change from the CTS to ITS 3.6.1.3 Action C could be characterized as Administrative, Less Restrictive, or a combination of the two.

One objective of the conversion to the ITS is to correct these types of problem areas. The Quad Cities ITS provide the appropriate SRs and Actions, if the surveillances are not met, to correct the ambiguity of the CTS while not degrading the safe operation of the plant. Thus, the staff finds that ITS 3.6.1.3 is acceptable.

Conversion to 24 Month Surveillance Interval (LD, LE, *and* LF)

Improved reactor fuels allow licensees to consider increasing the duration of the fuel cycle for their facilities. The staff has reviewed and approved a number of requests to extend

surveillance requirements to accommodate a 24-month fuel cycle. The staff has found that the effect on plant safety is small because safety systems use redundant electrical and mechanical components and because licensees perform other surveillances during plant operation that confirm that these systems and components can perform their safety functions.

Generic Letter (GL) 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," issued on April 2, 1991, provides staff guidance that identifies the types of information that must be addressed when proposing extensions of the fuel cycle to 24 months. The GL addressed steam generator inspections (which are not applicable to Quad Cities), leak rate testing pursuant to Appendix J to 10 CFR Part 50 (which is not applicable to Quad Cities because individual leak testing requirements have been replaced by the Primary Containment Leakage Rate Testing Program), instrument drift, and other 18-month surveillances that are extended to 24 months.

The GL requires that licensees address instrument drift when proposing an increase in the surveillance interval for calibrating instruments that perform safety functions including providing the capability for safe shutdown. The effect of the increased calibration interval on instrument errors must be addressed because instrument errors caused by drift were considered when determining safety system setpoints and when performing safety analyses.

For the remaining 18-month surveillances, the GL requires the following information to support conversion to a 24-month operating cycle:

- (1) Licensees should evaluate the effect on safety of an increase in 18-month surveillance intervals to accommodate a 24-month fuel cycle. This evaluation should support a conclusion that the effect on safety is small.
- (2) Licensees should confirm that historical plant maintenance and surveillance data support this conclusion.
- (3) Licensees should confirm that assumptions in the plant licensing basis would not be invalidated on the basis of performing any surveillance at the bounding surveillance interval limit provided to accommodate a 24-month fuel cycle.

In consideration of these confirmations, the staff concluded that licensees need not quantify the effect of the change in surveillance intervals on the availability of individual systems or components.

INSTRUMENT DRIFT

The staff's review grouped the instrumentation changes together. This primarily includes extensions of channel calibrations and logic system functional tests from 18 to 24 months.

By letter dated March 3, 2000, the licensee submitted a request to amend the Facility Operating Licenses for Dresden, LaSalle, and Quad Cities nuclear power plants. The amendment proposes changes to the technical specifications (TS) to extend the surveillance intervals for selected TS items from 18 months to 24 months. By letter dated March 24, 2000, the licensee submitted the methodology used for the determination of instrument setpoints and allowable values. On April 27, 2000, a meeting was held with the licensee to discuss the staff request for

additional information and by letter dated June 5, 2000, the licensee provided the information requested by the staff. On August 22 and 23, a meeting was held with the licensee to review their sample calculations. During that meeting, the staff identified some concerns with the licensee's response of June 5, 2000, and by letter dated November 30, 2000, the licensee provided the response to resolve the staff's concerns.

GL 91-04 required that information in seven specific areas be addressed in order to provide an acceptable basis for increasing the calibration interval for instruments that are used to perform safety functions. The following discussion identifies these seven areas and includes a summary of the licensee's response along with the staff's conclusions.

- (1) Confirm that instrument drift as determined by as-found and as-left calibration data from surveillance and maintenance records have not, except on rare occasions, exceeded acceptable limits for a calibration interval.
- (2) Confirm that the values of drift for each instrument type (make, model, and range) and application have been determined with a high probability and a high degree of confidence. Provide a summary of the methodology and assumptions used to determine the rate of instrument drift with time based upon historical plant calibration data.
- (3) Confirm that the magnitude of instrument drift has been determined with a high probability and a high degree of confidence for a bounding calibration interval of 30 months for each instrument type (make, model number, and range) and application that performs a safety function. Provide a list of the channels by TS section that identifies these instrument applications.
- (4) Confirm that a comparison of the projected instrument drift errors has been made with the values of drift used in the setpoint analysis. If this results in revised setpoints to accommodate large drift errors, provide proposed TS changes to update trip setpoints. If the drift errors result in a revised safety analysis to support existing setpoints, provide a summary of the updated analysis conclusions to confirm that safety limits and safety analysis assumptions are not exceeded.
- (5) Confirm that the projected instrument errors caused by drift are acceptable for control of plant parameters to effect a safe shutdown with the associated instrumentation.
- (6) Confirm that all conditions and assumptions of the setpoint and safety analyses have been checked and are appropriately reflected in the acceptance criteria of plant surveillance procedures for channel checks, channel functional tests, and channel calibrations.
- (7) Provide a summary description of the program for monitoring and assessing the effects of increased calibration surveillance intervals of instrument drift and its effect on safety.

The licensee performed a safety assessment for the proposed changes to the surveillance test intervals in accordance with the GL 91-04 guidance stated above. This assessment entailed reviewing the historical maintenance and surveillance test data at the bounding surveillance test interval limit, performing an evaluation to ensure that a 24-month surveillance test interval would not invalidate any assumption in the plant licensing bases, and the determination that the effect of the surveillance interval extension is small.

Additionally, these evaluations and analyses have been performed utilizing the guidance provided in

In their submittals of March 3, and 24, 2000, the licensee identified Nuclear Engineering Standard NES-EIC-20.04, Rev. 1, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy," which included Appendix J, "Guidelines For the Analysis and Use of As-Found/As-Left Data," as the basis for performing analyses of drift for all affected instrument loops in order to establish the effect of a 30-month (24 months + 25% allowable tolerance) calibration frequency on instrument performance. This appendix is based on Electric Power Research Institute (EPRI) TR-103335, "Guidelines for Instrument Calibration Extension/Reduction Programs," Rev. 1, October 1998. The licensee has used Microsoft Excel spreadsheets to document information for performing additional analyses to be consistent with the analyses recommended by NRC in its safety evaluation report (SER) for the Peach Bottom Atomic Power Station, Units 2 and 3.

or the methodology described in NEDC-3136RA, "General Electric Instrument Setpoint Methodology," dated September 1996 (for Nuclear Instrumentation Functions only)

During the meeting of April 27, 2000, the staff identified concerns with the licensee's sample data, outlier determination, time dependency, the graded approach to instrument setpoint determination (Appendix D to the Nuclear Engineering Standard), and miscellaneous other items. Based on the staff's comments, the licensee, by letter dated June 5, 2000, submitted the revised Nuclear Engineering Standard and their justification for surveillance extensions. The staff reviewed the revised documents and was still concerned with the outlier determination, time dependency, and the graded approach to instrument setpoint determination. However, during a conference call the licensee was able to satisfy the staff's concerns and it was decided to have a meeting to review some sample calculations to better understand the licensee's methodology. The staff reviewed the sample calculations and determined the licensee's approach acceptable but wanted the licensee to revise the Nuclear Engineering Standard to clearly describe their methodology. Based on this, the licensee provided Rev. 3 of the Nuclear Engineering Standard and submitted a letter dated November 30, 2000, to state that graded approach to setpoint determination has not been used by the licensee.

The staff has reviewed the licensee's submittals, including the responses to additional information, and has verified that the licensee has addressed the issues identified in GL 91-04 and provided an acceptable basis for increasing the calibration interval and for determining the instrument setpoint and allowable values for instruments that are used to perform safety functions. On the basis of the evaluation, the staff concludes that the licensee has confirmed that safety limits and safety analysis assumptions will not be exceeded after the worst-case drift is considered for the instruments whose surveillance intervals will be extended to 24 months.

On the basis of its review, the staff concludes that the proposed methodology for extending surveillance intervals for certain safety-related instrumentation components is consistent with the guidance in GL 91-04 in that the licensee has demonstrated that the effect of extending the surveillance intervals to 24 months is negligible and the system will continue to perform within assumed limits during the longer surveillance interval. The staff also finds that the instrument setpoint methodology used by the licensee to determine the allowable values is acceptable.

NON-INSTRUMENTATION CHANGES

Regarding non-instrumentation changes, GL 91-04 requires licensees to evaluate the effect on safety of the change in surveillance intervals to accommodate a 24-month fuel cycle. This evaluation should support a conclusion that the effect on safety is small. In addition, licensees should confirm that the performance of surveillances at the bounding surveillance interval limit provided to accommodate a 24-month fuel cycle would not invalidate any assumption in the

plant licensing basis. In consideration of these confirmations, the licensees need not quantify the effect of the change in surveillance intervals on the availability of individual systems or components.

To address the requirements of the GL 91-04, the licensee has referenced the NRC SER (dated August 2, 1993) relating to the extension of the Peach Bottom Units 2 and 3 surveillance intervals from 18 months to 24 months. In this SER, the staff stated the following:

Industry reliability studies for boiling water reactors (BWRs), prepared by the BWR Owners Group (NEDC-30936P) show that the overall safety systems' reliabilities are not dominated by the reliabilities of the logic system, but by that of the mechanical components, (e.g., pumps and valves), which are consequently tested on a more frequent basis. Since the probability of a relay, or contact failure is small relative to the probability of mechanical component failure, increasing the Logic System Functional Test interval represents no significant change in the overall safety system unavailability.

The licensee has reviewed the surveillance test history at Quad Cities and has validated this conclusion. The licensee's review has demonstrated that there are no failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

The following discussion describes how the staff determined that the effect of extending surveillance intervals on plant safety is small. The staff's review focused on redundant electrical and mechanical components as well as other surveillances conducted during plant operation that confirm that these systems and components can perform their safety functions.

TS 3.1.7 Standby Liquid Control (SLC) System

The SLC system is a backup to the control rod drive system and designed to be single-failure proof.

SR 3.1.7.8 Verify flow through one SLC subsystem from pump into reactor pressure vessel

This SR ensures that the SLC system is capable of injecting into the reactor pressure vessel by verifying a flow path and also by firing one of the explosive valves.

SR 3.1.7.9 Verify all heat traced piping between storage tank and pump suction is unblocked

This SR ensures that the SLC system is capable of injecting into the reactor pressure vessel by verifying a flow path through the heat traced piping.

System availability during the operating cycle is assured by:

- The SLC system is designed so that all active components are single failure proof.
- Each SLC pump is tested during the operating cycle in accordance with the Inservice Testing Program.
- Daily SRs verifies that temperatures in the SLC system tank and the SLC pump suction piping precludes boron precipitation.

- Monthly SRs ensure the continuity of the explosive charge on the discharge valves.
- The explosive valves are designed to be highly reliable.
- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 3.1.8 Scram Discharge Volume (SDV) Vent and Drain Valves

SR 3.1.8.3 Verify each SDV vent and drain valve:

- (A) a. Closes in ≤ 30 seconds after receipt of an actual or simulated scram signal; and
- (B) b. Opens when the actual or simulated scram signal is reset.

This SR ensures that the SDV vent and drain valves close in ≤ 30 seconds after receipt of an actual or simulated scram signal and open when the actual or simulated scram signal is reset.

System availability during the operating cycle is assured by:

- SR 3.1.8.2 requires that the SDV vent and drain valves be cycled fully closed and fully open once every 92 days during the operating cycle.
- Performance of SR 3.1.8.2 demonstrates that mechanical components and portions of the valve logic remain operable.
- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 3.4.5 RCS Leakage Detection Instrumentation

SR 3.4.5.3 Perform a CHANNEL CALIBRATION of required leakage detection instrumentation.

This SR ensures that the required primary containment atmosphere particulate monitoring system and drywell floor drain sump monitoring systems are operable and within the established calibration requirements.

System availability during the operating cycle is assured by:

- The primary containment atmosphere particulate monitoring system and the drywell floor drain sump monitoring system provide independent methods to detect RCS leakage.
- Instrument drift occurs incrementally over an extended time frame whereas the detection of RCS leakage would be represented by a sudden step change. Therefore, the detection of RCS leakage would not be precluded from the long-term effects of instrument drift.

NRC

This is an instrument covered by an LE DOC. Should it be in this Section since the title is "Non Instrumentation Changes"

- The primary containment atmosphere particulate monitoring system and the drywell floor drain sump monitoring system only provides a monitoring function and is not relied upon for actuation of safety-related equipment.
- SR 3.4.5.1, which is performed once every 12 hours, verifies operation of the primary containment atmospheric monitoring system.
- SR 3.4.5.2, which is performed once every 31 days, requires a channel functional test which would detect significant system degradation.
- The licensee's review of historical calibration records concludes that the impact, if any, of this change on system availability is minimal.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 3.5.1 ECCS - Operating

The staff's evaluation for TS 3.5.1 separately groups ECCS systems (i.e., SRs 3.5.1.7 and 3.5.1.8) and the ADS (i.e., SRs 3.5.1.9, and 3.5.1.10).

SR 3.5.1.7 Verify, with reactor pressure ≤ 180 psig, the HPCI pump can develop a flow rate of ≥ 5000 gpm against a system head corresponding to reactor pressure.

This SR ensures that the high pressure coolant injection system (HPCI) can perform its design function by developing the appropriate system flow.

SR 3.5.1.8 Verify each ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal

This SR includes the HPCI system, the low pressure coolant injection (LPCI) system, and the core spray (CS) system. The ECCS functional test ensures that a system initiation signal (actual or simulated) to the automatic initiation logic will cause the systems or subsystems to operate as designed, including actuation of the system throughout its emergency operating sequence, automatic pump startup and actuation of automatic valves to their required positions.

HPCI, LPCI, and CS system availability during the operating cycle is assured by:

- The ECCS network has built-in redundancy so that no single-failure prevents starting of the ECCS.
- Extensions of the calibration cycle and logic system functional test frequency have previously been justified.
- Pumps and valves associated with these systems are tested in accordance with the Inservice Testing program. These tests will detect significant failures in the ECCS subsystems.
- SR 3.5.1.1, which is performed once every 31 days, ensures that the ECCS piping systems are filled with water to prevent water hammer affects.
- SR 3.5.1.2, which is performed once every 31 days, ensures that the ECCS valves are in the correct position.
- SR 3.5.1.3, which is performed once every 31 days, verifies the correct breaker alignment to the LPCI swing bus.

- The licensee's review of surveillance test history for the ECCS system did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

SR 3.5.1.9 Verify the ADS actuates on an actual or simulated automatic initiation signal

This SR verifies that the ADS operates as designed when initiated either by an actual or simulated initiation signal and that the valve and solenoid are functioning properly.

SR 3.5.1.10 Verify each required ADS valve opens when manually actuated

This SR verifies that the ADS function operates as designed when manually actuated and also ensures the valve actuator and solenoids operate properly.

System availability during the operating cycle is assured by:

- The ADS has built-in redundancy so that no single-failure prevents the opening of the required number of ADS valves.
- The relief valves associated with the ADS are equipped with remote manual switches so that the entire system can be operated manually as well as automatically.
- The licensee's review of surveillance test history for the ADS system did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 3.5.2 ECCS - Shutdown

SR 3.5.2.5 Verify each required ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal

This SR includes the HPCI system, the LPCI system, and the CS system. The ECCS functional test ensures that a system initiation signal (actual or simulated) to the automatic initiation logic will cause the systems or subsystems to operate as designed, including actuation of the system throughout its emergency operating sequence, automatic pump startup and actuation of automatic valves to their required positions.

HPCI, LPCI, and CS system availability during the operating cycle is assured by:

- The ECCS network has built-in redundancy so that no single-failure prevents starting of the ECCS.
- Extensions of the calibration cycle and logic system functional test frequency have previously been justified.

- SR 3.5.2.3, which is performed every 31 days, ensures that the ECCS valves are in the correct position.

- Pumps and valves associated with these systems are tested in accordance with the Inservice Testing program. These tests will detect significant failures in the ECCS subsystems.
- SR 3.5.2.1, which is performed once every 12 hours, verifies for each required ECCS subsystem that (a) suppression pool water level is ≥ 8.5 ft, or (b) contaminated condensate storage tank water level is ≥ 7.5 ft.
- SR 3.5.2.2, which is performed once every 31 days, verifies for each required ECCS subsystem that the piping is filled with water.
- The licensee's review of surveillance test history for the ECCS systems did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 3.5.3 Reactor Core Isolation Cooling (RCIC) System

SR 3.5.3.4 Verify, with reactor pressure ≤ 180 psig, the RCIC pump can develop a flow rate of ≥ 400 gpm against a system head corresponding to reactor pressure.

SR 3.5.3.5 Verify the RCIC System actuates on an actual or simulated automatic initiation signal.

at approximately the system minimum required pressure

SR 3.5.3.4, the RCIC low pressure flow test, ensures the RCIC system is capable of performing its design function ~~before reactor pressure is increased above the system minimum operating pressure~~. SR 3.5.3.5, the RCIC system functional test, ensures that a system initiation signal to the automatic initiation logic will initiate the system to respond as designed.

System availability during the operating cycle is assured by:

- SR 3.5.3.1, which is performed once every 31 days, verifies that the RCIC system piping is filled with water to avoid effects of water hammer.
- SR 3.5.3.2, which is performed once every 31 days, verifies valve position in the RCIC system.
- SR 3.5.3.3, which is performed once every ⁹²~~31~~ days, requires a RCIC pump test to verify pump capacity at system pressure.
- The RCIC system is a backup to the HPCI system. In addition, technical specifications prohibit extended plant operation with both the RCIC and HPCI systems inoperable. Finally, the safety analysis does not take credit for operation of the RCIC system.
- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information and the fact that the RCIC system is not relied upon in the safety analysis, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 3.6.1.1 Primary Containment

acceptable AISK design value of 0.18 ft^2 at an initial differential pressure of $\geq 1.0 \text{ psi}$

SR 3.6.1.1.2 Verify drywell-to-suppression chamber bypass leakage is less than or equal to the bypass leakage limit. However, during the first unit startup following bypass leakage testing performed in accordance with this SR, the acceptance criterion is $\leq 2\%$ of the drywell-to-suppression chamber bypass leakage limit.

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D}

The drywell-to-suppression chamber bypass leak test ensures that the boundary between the drywell airspace and the suppression chamber airspace is maintained to ensure the pressure suppression function is operable by limiting the amount of bypass steam leakage which would not be directed through the suppression pool water.

System availability during the operating cycle is assured by:

- The suppression chamber-to-drywell vacuum breakers are the only active mechanical devices in the boundary between the drywell air space and the suppression chamber. The vacuum breakers are verified to be in the closed position once every 14 days through performance of proposed SR 3.6.1.8.1. In addition, a functional test of each required vacuum breaker is performed once every 31 days through performance of SR 3.6.1.8.2. These tests ensure that the valves are functional and closed.
- The suppression chamber-to-drywell vacuum breakers include a passive design which does not appear to be subject to any time-based changes that would be affected by the change to a 24-month operating cycle.
- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 3.6.1.3 Primary Containment Isolation Valves (PCIVs)

SR 3.6.1.3.7 Verify each automatic PCIV actuates to the isolation position on an actual or simulated isolation signal.

This SR ensures that each PCIV will actuate to its isolation position on a primary containment isolation signal.

System availability during the operating cycle is assured by:

- The PCIVs, including the actuating logic, are designed to be single-failure proof and, therefore, are highly reliable.
- Extension of the logic system functional test has been previously justified.
- During the operating cycle the PCIVs are either exercised (closed or open) or partially stroked (open or closed) in accordance with the Inservice Testing program or have justifications and reliefs to document why testing on an extended frequency is acceptable. The exercise or partial stroke testing of these PCIVs tests a significant portion of the PCIV's circuitry and will detect failures of this circuitry or failures with valve movement.

- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

SR 3.6.1.3.8 Verify each reactor instrumentation line excess flow check valve (EFCV) actuates to the isolation position on an actual or simulated instrument line break signal.

This SR provides assurance that the instrumentation line EFCVs will perform as designed by actuating to their isolation position on an actual or simulated instrument line break signal. The 24-month surveillance frequency is based on the need to perform the SR under conditions that apply during a plant outage and the potential for an unplanned transient if the SR were performed with the reactor at power.

System availability during the operating cycle is assured by:

- The instrument lines are seismic category 1 and terminate in instruments that are seismic category 1. The instrumentation piping is composed of quarter-inch piping in the secondary containment that is sized to assure that a postulated failure would limit any offsite exposure to substantially below the standards of 10 CFR Part 100.
- Due to the mechanical nature of the check valves and instrumentation piping system, there are no definable drift components or any time-based conditions that could appreciably change during the operating cycle.
- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

SR 3.6.1.3.9 Remove and test the explosive squib from each shear isolation valve of the traversing incore probe (TIP) system.

The SR requires that the explosive squib be removed and tested for the shear isolation valve of the TIP system. An in-place functional test is not possible with this design.

System availability during the operating cycle is assured by:

- The replacement charge for the explosive squib is from the same manufactured batch as the one fired or from another batch that has been certified by having one of the batch successfully fired.
- Administrative controls for the explosive charges, such as those that limit shelf life and operating life, are followed.
- SR 3.6.1.3.4 verifies the circuit continuity of the TIP shear isolation valve explosive charge once every 31 days.

- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 3.6.1.7 Reactor Building-to-Suppression Chamber Vacuum Breakers

SR 3.6.1.7.3 Verify the opening setpoint of each vacuum breaker is ≤ 0.5 psid.

This SR ensures that each reactor building-to-suppression chamber vacuum breaker check valve and vacuum breaker butterfly valve is capable of performing its safety function.

System availability during the operating cycle is assured by:

- The vacuum relief system design for the active components has built-in redundancy.
- SR 3.6.1.7.2 requires that each vacuum breaker be functionally tested once every 92 days by cycling each vacuum breaker check valve and butterfly valve. This surveillance ensures that the valves are capable of being cycled and return to the closed position.
- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 3.6.1.8 Suppression Chamber-to-Drywell Vacuum Breaker

SR 3.6.1.8.3 Verify the opening setpoint of each required vacuum breaker is ≤ 0.5 psid.

SR 3.6.1.8.3 verifies the opening setpoint of each suppression chamber-to-drywell vacuum breaker is less than or equal to the specified differential pressure. The 24-month frequency is based on the need to perform this surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the surveillance were performed with the reactor at power.

Not
consistent
with
SR 3.6.1.7.3
wording

System availability during the operating cycle is assured by:

- SR 3.6.1.8.1, which is performed once every 14 days, verifies that each vacuum breaker is closed.
- SR 3.6.1.8.2 requires that each vacuum breaker be functionally tested once every 31 days. This surveillance ensures that the valves are capable of being cycled and return to the closed position.
- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 3.6.4.1 Secondary Containment

SR 3.6.4.1.3 Verify the secondary containment can be maintained ≥ 0.25 inch of vacuum water gauge for 1 hour using one standby gas treatment subsystem at a flow rate of ≤ 4000 cfm.

This SR ensures secondary containment boundary integrity by demonstrating that secondary containment vacuum can be maintained.

System availability during the operating cycle is assured by:

- Secondary containment is maintained at a negative pressure during normal plant operation. Any significant degradation to the secondary containment barrier would be detected through loss of vacuum.
- SR 3.6.4.1.1, which is performed once every 24 hours, verifies that the secondary containment vacuum is being maintained at ≥ 0.25 inch water gauge.
- Secondary containment structural integrity is maintained through administrative controls which ensure that no significant changes will be made to the secondary containment without proper evaluation.
- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 3.6.4.2 Secondary Containment Isolation Valves (SCIVs)

SR 3.6.4.2.3 Verify each automatic SCIV actuates to the isolation position on an actual or simulated signal.

SR 3.6.4.2.3 ensures that each SCIV is capable of performing its intended function by actuating to the isolation position on an actual or simulated signal.

System availability during the operating cycle is assured by:

- SR 3.6.4.2.2, which is performed once every 92 days, verifies that the isolation time of each power operated, automatic SCIV is within limits. This surveillance cycles each automatic SCIV and would detect significant degradation affecting valve operation.
- The active components and power supplies of the SCIVs are designed to be single failure proof.
- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 3.6.4.3 Standby Gas Treatment (SGT) System

SGT system ensures that radioactive materials that leak from the primary containment into the secondary containment following an accident are filtered and adsorbed prior to being exhausted to the environment.

SR 3.6.4.3.3 Verify each SGT subsystem actuates on an actual or simulated initiation signal

This SR verifies that each SGT subsystem will actuate on an actual or simulated initiation signal.

System availability during the operating cycle is assured by:

- There are two redundant and independent SGT subsystems such that a single-failure will not prevent system operation.
- SR 3.6.4.3.1 is a monthly surveillance that requires each SGT subsystem to be started and operated for ≥ 10 hours with heaters operating. This test verifies system operation and would identify significant system problems or failures.
- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 3.7.2 Diesel Generator Cooling Water (DGCW) System

SR 3.7.2.2 Verify each required DGCW pump starts automatically when its associated diesel generator starts

on an actual or simulated initiation signal

The DGCW System functional test, SR 3.7.2.2 ensures that a system start signal from the associated diesel generator will cause the system to operate as designed, by automatically starting the DGCW pump.

System availability during the operating cycle is assured by:

- Each of the DGCW pumps are tested in accordance with the inservice testing program to ensure that each subsystem can provide the proper flow against a specified test pressure. This test will detect significant failures of the DGCW system to perform its intended function.
- SR 3.8.1.2, which requires monthly testing of the diesel generators, verifies operation of the DGCW system. This testing will detect significant failures affecting system operation.
- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 3.7.4 Control Room Emergency Ventilation (CREV) System

① The CREV system provides a radiologically controlled environment from which the plant can be safely operated following a LOCA. The CREV is designed to maintain the control room emergency zone environment for a 30-day continuous occupancy after a DBA without exceeding dose limits. The CREV System will pressurize the control room emergency zone to about 0.125 inches water gauge to minimize infiltration of air from adjacent zones.

SR 3.7.4.3 Verify the CREV System isolation dampers close on an actual or simulated initiation signal

SR 3.7.4.4 Verify the CREV System can maintain a positive pressure of ≥ 0.125 inches water gauge relative to the adjacent areas during the pressurization mode of operation at a flow rate of ≤ 2000 scfm.

SR 3.7.4.3 and 3.7.4.4 ensures that the CREV System is capable of automatic isolation and that the control room emergency zone boundary leakage is within the capacity of the CREV System by demonstrating that the control room emergency zone can be maintained at a positive pressure with respect to adjacent areas when in the emergency isolation/pressurization mode of operation.

System availability during the operating cycle is assured by:

- SR 3.7.4.1, which is conducted once every 31 days, requires the CREV System be operated for ≥ 10 hours with the heaters operating. These tests would detect significant failures affecting system operation.
- The actual or simulated isolation signal is equivalent to a logic system functional test. Extension of the logic system functional test has been previously justified.
- The control room emergency zone is maintained at a positive pressure during normal operation. Therefore, any substantial degradation of the boundary will be evident and repairs can be accomplished in a timely manner.
- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 3.7.5 Control Room Emergency Ventilation Air Conditioning (AC) System

The CREV AC system provides a suitable environment for continuous personnel occupancy and ensures the operability of control room equipment and instruments under normal and accident conditions.

SR 3.7.5.1 Verify the Control Room Emergency Ventilation AC System has the capability to remove the assumed heat load.

The SR verifies that the CREV AC System has the capability to remove the assumed heat load. The CREV AC System auto-starts on control room temperature when the CREV System is operating. Both the CREV and the CREV AC are normally maintained in standby and are operated only for required surveillances.

System availability during the operating cycle is assured by:

- SR 3.7.4.1, which is conducted once every 31 days, requires the CREV System be operated for ≥ 10 hours with the heaters operating. The licensee has confirmed that the CREV AC is verified to be operational during the monthly performance of SR 3.7.4.1. These tests would detect significant failures affecting system operation.
- The licensee's review of the surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 3.8.1 AC Sources - Operating

The unit Class 1E AC Electrical Power Distribution Systems AC sources consist of the offsite power sources, and the onsite standby power sources (diesel generators (DGs) 1, 2, and $\frac{1}{2}$).

The Class 1E unit AC distribution system is, for the most part, divided into redundant load groups (Division 1 and 2), so loss of any one group does not prevent the minimum safety functions from being performed. The exception is that the opposite unit's AC Electrical Power Distribution System powers shared loads (i.e., standby gas treatment subsystem, CREV System (Unit 2 only), and CREV AC System (Unit 2 only)). Although shared by both units, the CREV System and the CREV AC System are single train systems that are powered only from a single Unit 1 motor control center. Each unit's load group has connections to physically independent offsite power sources and a single DG.

The staff's evaluation for SRs 3.8.1.9 through and including 3.8.1.19 have been grouped together.

SR 3.8.1.9 Verify manual transfer of unit power supply from the normal offsite circuit to the alternate offsite circuit.

This SR includes the transfer of each unit auxiliary transformer to the associated unit reserve auxiliary transformer and a verification of the cross tie between the unit's 4160 V ESS buses.

SR 3.8.1.10 Verify each DG rejects a load greater than or equal to its associated single largest post-accident load, and:

- a 1. following load rejection, the frequency is ≤ 66.73 Hz;
- b 2. Within 3 seconds following load rejection, the voltage is ≥ 3952 V and ≤ 4368 V; and
- c 3. Within 4 seconds following load rejection, the frequency is ≥ 58.8 Hz and ≤ 61.2 Hz.

This SR demonstrates the DG load response characteristics and capability to reject the largest single load without exceeding predetermined voltage and frequency and while maintaining a specified margin to the overspeed trip.

SR 3.8.1.11 Verify each DG does not trip and voltage is maintained ≤ 5000 V during and following a load rejection of ≥ 2340 kW and ≤ 2600 kW.

This SR ensures proper engine generator load response under the simulated test conditions. This test simulates the loss of the total connected load that the DG experiences following a full load rejection and verifies that the DG does not trip upon loss of the load.

SR 3.8.1.12 Verify on an actual or simulated loss of offsite power signal:

- a. ~~A~~ De-energization of emergency buses;
- b. ~~B~~ Load shedding from emergency buses; and
- c. ~~C~~ DG auto-starts from standby condition and:
 1. energizes permanently connected loads in ≤ 10 seconds,
 2. maintains steady state voltage ≥ 3952 V and ≤ 4368 V,
 3. maintains steady state frequency ≥ 58.8 Hz and ≤ 61.2 Hz, and
 4. supplies permanently connected ~~and auto-connected~~ loads for ≥ 5 minutes.

This SR verifies all actions encountered from the loss of offsite power, including shedding of the nonessential loads and energization of the emergency buses and respective loads from the DG. It further demonstrates the capability of the DG to automatically achieve the required voltage and frequency within the specified time.

SR 3.8.1.13 Verify on an actual or simulated Emergency Core Cooling System (ECCS) initiation signal each DG auto-starts from standby condition and:

- a. ~~A~~ In ≤ 10 seconds after auto-start achieves voltage ≥ 3952 V and frequency ≥ 58.8 Hz;
- b. ~~B~~ Achieves steady state voltage ≥ 3952 V and ≤ 4368 V and frequency ≥ 58.8 Hz and ≤ 61.2 Hz;
- c. ~~C~~ Operates for ≥ 5 minutes;
- d. ~~D~~ Permanently connected loads remain energized from the offsite power system; and
- e. ~~E~~ Emergency loads are auto-connected to the offsite power system.

This SR demonstrates that the DG automatically starts and achieves the required voltage and frequency within the specified time (10 seconds) from the design basis actuation signal (LOCA signal). In addition, the DG is required to maintain proper voltage and frequency limits after steady state is achieved.

SR 3.8.1.14 Verify each DG's automatic trips are bypassed on actual or simulated loss of voltage signal on the emergency bus concurrent with an actual or simulated ECCS initiation signal except:

- (a) A. Engine overspeed; and
- (b) B. Generator differential current.

This SR demonstrates that each DG non-critical protective trip is bypassed on an actual or simulated ECCS initiation signal and that critical protective functions trip the DG.

SR 3.8.1.15 Verify each DG operating within the power factor limit operates for ≥ 24 hours:

- (a) A. For ≥ 2 hours loaded ≥ 2730 kW and ≤ 2860 kW; and
- (b) B. For the remaining hours of the test loaded ≥ 2340 kW and ≤ 2600 kW.

This SR demonstrates that each DG can start and run continuously at full load capability for an interval of not less than 24 hours, 22 hours of which is at a load equivalent to 90% to 100% of the continuous rating of the DG and 2 hours of which is at a load equivalent to 105% to 110% of the continuous rating of the DG.

SR 3.8.1.16 Verify each DG starts and achieves:

- (a) A. In ≤ 10 seconds, voltage ≥ 3952 V and frequency ≥ 58.8 Hz; and
- (b) B. Steady state voltage ≥ 3952 V and ≤ 4368 V and frequency ≥ 58.8 Hz and ≤ 61.2 Hz.

This SR demonstrates that the diesel engine can restart from a hot condition, such as subsequent to shutdown from normal surveillances, and achieve the required voltage and frequency within 10 seconds.

SR 3.8.1.17 Verify each DG:

- (a) A. Synchronizes with offsite power source while loaded with emergency loads upon a simulated restoration of offsite power;
- (b) B. Transfers loads to offsite power source; and
- (c) C. Returns to ready-to-load operation.

This SR demonstrates that the manual synchronization and automatic load transfer from the DG to the offsite source can be made and that the DG can be returned to ready to load status when offsite power is restored. It also ensures that the auto-start logic is reset to allow the DG to reload if a subsequent loss of offsite power occurs.

SR 3.8.1.18 Verify interval between each sequenced load block is within $\pm 10\%$ of design interval for each load sequence time delay relay. $\geq 90\%$ (the

This SR verifies that the sequence time is within $\pm 10\%$ percent of the design interval for each load sequence timer. Under accident conditions, loads are sequentially connected to the bus by the time delay relays. The time delay relays control the permissive and starting signals to motor breakers to prevent overloading of the bus power supply due to high motor starting currents. DGs

including through time delay relays, where applicable

SR 3.8.1.19 Verify, on an actual or simulated loss of offsite power signal in conjunction with an actual or simulated ECCS initiation signal:

- (a) → A. De-energization of emergency buses;
- (b) → B. Load shedding from emergency buses; and
- (c) → C. DG auto-starts from standby condition and:
 1. energizes permanently connected loads in ≤ 10 seconds,
 2. energizes auto-connected emergency loads,
 3. maintains steady state voltage ≥ 3952 V and ≤ 4368 V,
 4. maintains steady state frequency ≥ 58.8 Hz and ≤ 61.2 Hz, and
 5. supplies permanently connected and auto-connected emergency loads for ≥ 5 minutes.

This SR demonstrates operation of each DG during a loss-of-offsite power test signal coincident with an ECCS initiation.

AC Source system availability during the operating cycle is assured by:

- SR 3.8.1.2 requires that each DG be tested for operability once every 31 days. This testing, which is not being changed, will provide prompt identification of any substantial DG degradation or failure.
- SR 3.8.1.8 requires that each DG be fast start tested once every 184 days. This test, which is not being changed, will provide prompt identification of any substantial DG degradation or failure.
- DGs are not operated outside of the monthly operability tests in order to minimize wear related degradation.
- DG attributes subject to degradation due to aging, such as fuel oil quality, are subject to its requirements for replenishment and testing.
- An evaluation of known failures did not identify any time-based elements that would invalidate the conclusion that the increased operating cycle will have a small, if any, impact on system reliability.
- The licensee's review of the surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed changes for SRs 3.8.1.9 through 3.8.1.19 on plant safety are small and, therefore, acceptable.

TS 3.8.4 DC Sources - Operating

The DC electrical power systems provide the AC emergency power system with control power. They also provide both motive and control power to selected safety-related equipment. DC subsystems provide DC electrical power to inverters, which in turn power the AC essential service buses.

The 250 VDC power sources provide motive power to selected safety related larger DC loads such as DC motor-driven pumps and valves. The Division 1 and Division 2 125 VDC power sources provide both motive and control power to selected safety-related equipment, as well as

circuit breaker control power for the non-safety related 4160 switchgear, and all 480 V load centers.

The staff's evaluation for SRs 3.8.4.3 through and including 3.8.4.7 have been grouped together.

SR 3.8.4.3 Verify battery cells, cell plates and racks show no visual indication of physical damage or abnormal deterioration that could degrade battery performance.

SR 3.8.4.4 Remove visible corrosion, and verify battery cell to cell and terminal connections are coated with anti-corrosion material

SR 3.8.4.5 Verify battery connection resistance is

(a.) $\lambda \leq 1.5E-4$ ohm for inter-cell connections, and
(b.) $\lambda \leq 1.5E-4$ ohm for terminal connections.

SR 3.8.4.6 Verify each required 125 V battery charger supplies:

- (a.) ≥ 250 amps at ≥ 250 VDC for ≥ 4 hours for the 250 VDC subsystems; and
(b.) ≥ 200 amps at ≥ 125 VDC for ≥ 4 hours for the 125 VDC subsystems.

SR 3.8.4.7 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.

System availability during the operating cycle is assured by:

- The design, in conjunction with the technical specification requirements which limit the extent and duration of inoperable DC sources, provides substantial redundancy in DC sources.
- Battery parameters such as float voltage, electrolyte level, and specific gravity are monitored during the operating cycle to verify battery operability and will provide prompt identification of any substantial battery or battery charger degradation or failure. As an example, SR 3.8.4.1, which is performed once every 7 days, verifies that battery terminal voltage on float charge is within limits.
- Batteries are not discharged except for the performance of the operating cycle test demonstrations of operability. Therefore, there is minimal risk of age-related degradation.
- SR 3.8.4.2, which is performed once every 92 days, requires monitoring for visible corrosion at battery terminals and connectors. These examinations will provide prompt identification of any substantial battery
- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

degradation

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

Administrative Controls

TS 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 program includes integrated leak test requirements for each system. The frequency of performing these tests is being changed from once per operating cycle to once every 24 months.

System availability during the operating cycle is assured by:

- Most portions of the subject systems included in this program are visually walked down, while the plant is operating, during plant testing, and/or operator/system engineer walkdowns. In addition, housekeeping/safety walkdowns also serve to detect any gross leakage. If leakage is observed from these walkdowns, corrective actions will be taken for repairs.
- Plant radiological surveys will identify any potential sources of leakage. System walkdowns and surveys provide monitoring of the systems at a greater frequency than once per refueling cycle and would identify any significant system degradation or failures.
- The licensee's review of historical maintenance and surveillance data demonstrates that there is no adverse trend that would invalidate the conclusion that the impact on system availability, if any, is minimal from the proposed change.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 5.5.7 Ventilation Filter Testing Program (VFTP)

The VFTP shall establish the required testing of the engineered safety feature filter ventilation systems. The frequency for filter testing as described in the VFTP for the standby gas treatment (SGT) and control room emergency ventilation (CREV) systems is being changed from 18 to 24 month intervals.

System availability during the operating cycle is assured by:

- Both the SGT and CREV Systems are normally in standby. Therefore, the systems are not subject to degradation due to plant operation.
- Additional system testing is required if the potential for degradation occurs (i.e., following any structural maintenance on the HEPA filter or charcoal adsorber housings, following painting, fire, or chemical release in any ventilation zone communicating with the systems).
- The licensee's review of historical maintenance and surveillance data demonstrates that there are no failures that would invalidate the conclusion that the impact on system availability, if any, is minimal from the proposed changes.

Based on this information, the staff concludes that the impact of the proposed change on plant safety is small and the proposed change is, therefore, acceptable.

Additional TS Changes and Beyond-Scope Items

<<<To be provided later.>>>

IV. STATE CONSULTATION

In accordance with the Commission's regulations, the Illinois State official was notified of the proposed issuance of the amendments. The State official had no comments.

V. ENVIRONMENTAL CONSIDERATION

Pursuant to 10 CFR 51.21, 51.32, and 51.35, an Environmental Assessment and Finding of No Significant Impact was published in the *Federal Register* date on date (citation). Accordingly, based upon the environmental assessment, the Commission has determined that issuance of this amendment will not have a significant effect on the quality of the human environment.

VI. CONCLUSION

The Quad Cities ITS provide clearer, more readily understandable requirements to ensure safe operation of the plant. The NRC staff concludes that they satisfy the guidance in the Commission's policy statement with regard to the content of TS and conform to the model provided in NUREG-1433 with appropriate modifications for plant-specific considerations. The NRC staff further concludes that the Quad Cities ITS satisfy Section 182a of the Atomic Energy Act, 10 CFR 50.36, and other applicable standards. On this basis, the NRC staff concludes that the proposed Quad Cities ITS are acceptable.

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

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner; (2) such activities will be conducted in compliance with the Commission's regulations; and, (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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CTS Discussion of Change Tables

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TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 1.0 - USE AND APPLICATION

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|-------|---|---|--------------|
| A.1 | Editorial changes, reformatting, and revised numbering. | 1.1 | 1.0, 4.3.A.2 |
| A.2 | The definitions of CHANNEL, FUEL DESIGN LIMITING RATIO (FDLRX), LIMITING CONTROL ROD PATTERN (LCRP), PHYSICS TESTS, REPORTABLE EVENT, SOURCE CHECK, and TRIP SYSTEM are deleted since specific Specifications referring to them no longer contain their use, or no longer are retained in the Quad Cities 1 and 2 ITS. | N/A | 1.0 |
| A.3 | Revises the wording for the definitions of CHANNEL CALIBRATION, CHANNEL FUNCTIONAL TEST AND LOGIC SYSTEM FUNCTIONAL TEST to more accurately reflect the intent for OPERABILITY of a channel; i.e., not all channels will have a "required" sensor, alarm, or channel failure trip function, and conversely, some channels may have a "required" display or interlock function. Also, combining the separate definition/requirement for analog and bistable channels, and the phrase "or actual," in reference to the injected signal for the CHANNEL FUNCTIONAL TEST, has been added as an explicit option to the currently required simulated signal. | 1.1 CHANNEL FUNCTIONAL TEST (and LOGIC SYSTEM FUNCTIONAL TEST definitions | 1.0 |
| A.4 | Revises the wording for the definition of CHANNEL CALIBRATION to clarify requirements for thermocouples and RTDs. The intent of a CHANNEL CALIBRATION is to adjust the channel output so that the channel responds with known range and accuracy. Most instrument channels contain an adjustable transmitter (sensor) which is also subject to drift. The appropriate calibration at the Frequencies specified in the Quad Cities 1 and 2 ITS would consist of a verification of OPERABILITY of the sensing element and a calibration of the remaining adjustable devices in the channel. Calibration of the adjustable devices in the channel is performed by applying the sensing elements' (RTDs or thermocouples) fixed input/output relationships to the remainder of the channel and making the necessary adjustments to ensure range and accuracy. | 1.1 CHANNEL CALIBRATION definition | 1.0 |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 1.0 - USE AND APPLICATION**

| | | | |
|------|--|---|----------------|
| A.5 | Incorporates the current definition of CRITICAL POWER RATIO and FRACTION OF LIMITING POWER DENSITY into the proposed definition of MINIMUM CRITICAL POWER RATIO and MAXIMUM FRACTION OF LIMITING POWER DENSITY, respectively. | 1.1 MINIMUM CRITICAL POWER RATIO and MAXIMUM FRACTION OF LIMITING POWER DENSITY definitions | 1.0 |
| A.6 | Deletes the definition of FREQUENCY NOTATION since the abbreviations in Table 1.1 are no longer used; SR Frequencies in the Quad Cities 1 and 2 ITS are directly specified. | N/A | 1.0, Table 1.1 |
| A.7 | Combines the current definitions for IDENTIFIED LEAKAGE, PRESSURE BOUNDARY LEAKAGE, and UNIDENTIFIED LEAKAGE into one proposed defined term: LEAKAGE. | 1.1 LEAKAGE definition | 1.0 |
| A.8 | Provides clarifications: 1) as specified in the second portion of the current definition of IDENTIFIED LEAKAGE (proposed LEAKAGE definition), the intended leakage is that which occurs into the drywell space (i.e., containment atmosphere); and 2) the "collection systems" specified in the first portion of the definitions are intended to be those for collection of leakages into the drywell space. | 1.1 LEAKAGE definition | 1.0 |
| A.9 | Moves the definition of OFFSITE DOSE CALCULATION MANUAL to ITS 5.5.1. | 5.5.1 | 1.0 |
| A.10 | Replaces OPERATIONAL MODE with the ITS definition of MODE. Clarifying statements are added to indicate that defined MODES in ITS Table 1.1-1 apply only when fuel is in the reactor vessel and that reactor vessel head closure bolt tensioning is a parameter. | 1.1 MODE definition | 1.0 |
| A.11 | Deletes the definitions of PRIMARY CONTAINMENT INTEGRITY and SECONDARY CONTAINMENT INTEGRITY; all the requirements are specifically addressed in the LCOs for the Primary Containment and Secondary Containment, along with the remainder of the LCOs in the Containment Systems Section. | N/A | 1.0 |
| A.12 | Moves the definition of PROCESS CONTROL PROGRAM to the Administrative Controls Chapter (Chapter 5.0). | 5.0 | 1.0 |

TABLE A - ADMINISTRATIVE CHANGES MATRIX
 CHAPTER ~~10~~ - SAFETY LIMITS

1.0 USE AND APPLICATION

| | | | |
|------|---|--|-----------------------------------|
| A.13 | Modifies the definition of SHUTDOWN MARGIN to address stuck control rods, consistent with the Quad Cities 1 and 2 CTS requirement found in CTS 4.3.A.2 to account for the worth of a stuck control rod. | 1.1 SHUTDOWN MARGIN definition | 1.0, 4.3.A.2 |
| A.14 | Adds definitions of STAGGERED TEST BASIS and TURBINE BYPASS SYSTEM RESPONSE TIME consistent with their usage throughout the Quad Cities 1 and 2 ITS. | 1.1 STAGGERED TEST BASIS and TURBINE BYPASS SYSTEM RESPONSE TIME definitions | N/A |
| A.15 | Moves CTS Table 1.2, footnotes (a), (b), and (c) to LCO requirements in the Special Operations Section. | 3.10.1, 3.10.2, 3.10.3 | Table 1.2 footnotes (a), (b), (c) |
| A.16 | Deletes CTS Table 1.2, footnote (d), which references Special Test Exceptions 3.12.A, 3.12.B, and 3.12.C. | N/A | Table 1.2 footnote (d) |
| A.17 | The intent of applying the MODE definition only when fuel is in the vessel, as specified in CTS Table 1.2, footnote (c), has been moved to the definition of MODE. In addition, since the vessel head can only be removed if the head closure bolts are less than fully tensioned, there is no purpose in including "or with the head removed." | 1.1 MODE definition | Table 1.2 footnote (c) |
| A.18 | Adds Sections 1.2, Logical Connectors, 1.3, Completion Times, and 1.4 Frequency, to the Technical Specifications to aid in the understanding and use of the new format and presentation style, and to establish positions not previously formalized. | 1.2, 1.3, 1.4 | N/A |
| A.19 | Modifies the definition of REACTOR PROTECTION SYSTEM RESPONSE TIME to allow the associated time to be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured. | 1.1 REACTOR PROTECTION SYSTEM RESPONSE TIME definition | 1.0 |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 2.0 - SAFETY LIMITS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|-------|---|-------------|----------------------------|
| A.1 | Editorial changes, reformatting, and revised wording. | 2.0 | 2.0 |
| A.2 | Moves requirements for the Limiting Safety System Settings to ITS Section 3.3. | 3.3 | 2.2 |
| A.3 | Deletes the details contained in the Actions of CTS 2.1.A, 2.1.B, 2.1.C, and 2.1.D to comply with the requirements of Specification 6.7, since the ITS format does not include providing cross references. In addition, the reference to Specification 6.7 has been deleted since Specification 6.7 has been deleted from the Technical Specifications. | N/A | 2.1.A, 2.1.B, 2.1.C, 2.1.D |
| | | | |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.0 - LCO AND SR APPLICABILITY**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|-------|---|-------------|-------------|
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.0 | 3.0, 4.0 |
| A.2 | Renumber the CTS 3.0 series to LCO 3.0.X and the CTS 4.0 series to SR 3.0.X. | 3.0 | 3.0, 4.0 |
| A.3 | 1) Replaces the phrase "Compliance with...is required" with the phrase "LCOs shall be met;" 2) Changes "OPERATIONAL MODE(s)" to "MODES;" 3) Changes "conditions specified therein" to "specified conditions in the Applicability;" and 4) Changes the phrase "that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met, except as provided in Specification 3.0.E" to "as provided in LCO 3.0.2 and LCO 3.0.7." (LCO 3.0.2 addresses the requirement of meeting the associated ACTIONS when not meeting a Limiting Condition for Operation. LCO 3.0.7 addresses another situation when an LCO requirement is allowed not to be met.) | LCO 3.0.1 | 3.0.A |
| A.4 | 1) Replaces the lead-in sentence "Noncompliance with a Specification shall exist when..." with "Upon discovery of a failure to meet an LCO..."; 2) Changes the phrase "restored" to "met or is no longer applicable;" 3) Changes "time intervals" to "Completion Time(s);" 4) Changes "ACTION requirements" to "Required Action(s);" 5) Adds exception to LCO 3.0.6 due to its inclusion in the Quad Cities 1 and 2 ITS; and 6) Adds the phrase "unless otherwise stated" consistent with current Quad Cities 1 and 2 TS exceptions found in a few LCOs to avoid potential misapplication of those requirements. | LCO 3.0.2 | 3.0.B |
| A.5 | 1) Replaces the phrase "except as provided in the associated ACTION requirements" with "and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS" to cover all potential possibilities that require entry into LCO 3.0.3; 2) Changes "OPERATIONAL MODE" to "MODE or other specified condition;" 3) Revises the times to reach each MODE to include the 1 hour allowed by CTS 3.0.C for initiating the shutdown. Also, the time represents the total time allowed from the entry into LCO 3.0.3, replacing the current presentation where each time is referenced as "the next," or "the subsequent;" 4) Changes the phrase "under the ACTION requirements...failure to meet the Limiting Condition for Operation" to "in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required," to specifically state that LCO 3.0.3 actions do not have to be completed; and 5) Changes "This specification is not applicable in OPERATIONAL MODE 4 or 5" to "LCO 3.0.3 is only applicable in MODES 1, 2, and 3." | LCO 3.0.3 | 3.0.C |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.0 - LCO AND SR APPLICABILITY**

| | | | |
|------|---|-----------|--------------|
| A.6 | 1) Revises the phrase "This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS." to include "or that are part of a shutdown of the unit;" 2) Adds the sentence "LCO 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3." | LCO 3.0.4 | 3.0.D |
| A.7 | ITS LCO 3.0.6 is added to provide guidance regarding the appropriate ACTIONS to be taken when a single inoperability (a support system) also results in the inoperability of one or more related systems (supported system(s)). | LCO 3.0.6 | N/A |
| A.8 | ITS LCO 3.0.7 is added to provide guidance regarding the meeting of Special Operations LCOs in Section 3.10. | LCO 3.0.7 | N/A |
| A.9 | ITS SR 3.0.1 is constructed to more completely present the relationship between Surveillance Requirements and meeting the requirements of the LCO. The second sentence of ITS SR 3.0.1, "Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO," is proposed to clarify existing intent that is not explicitly stated. The concept (editorially rewritten) found in the first sentence of CTS 4.0.C, has been moved to the third sentence of ITS SR 3.0.1; "Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO, except as provided in SR 3.0.3." The sentence "Surveillance Requirements do not have to be performed on inoperable equipment" is moved from the last sentence of CTS 4.0.C, to ITS SR 3.0.1. Since all LCOs do not deal exclusively with equipment OPERABILITY, a clarifying phrase is also added: "or variables outside specified limits." | SR 3.0.1 | 4.0.A, 4.0.C |
| A.10 | "The specified Frequency for each Surveillance Requirement 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," was added to clearly establish what constituted meeting the specified Frequency of each Surveillance Requirement. Also, the sentence "Exceptions to this Specification are stated in the individual Specifications" is added to acknowledge the explicit use of exceptions in various Surveillances. | SR 3.0.2 | 4.0.B |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.0 - LCO AND SR APPLICABILITY**

| | | | |
|------|--|---------------------|-------|
| A.11 | 1) Changes "Entry into an OPERATIONAL MODE or other specified applicable condition" to "Entry into a MODE or other specified condition in the Applicability of an LCO."; 2) Rewords "...passage through or to OPERATIONAL MODE(s) as required to comply with ACTION requirements" to "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"; and 3) Adds the sentence "SR 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3." | SR 3.0.4 | 4.0.D |
| A.12 | Moves the technical content of CTS 4.0.E to ITS 5.5.6. | 5.5.6 | 4.0.E |
| A.13 | ITS LCO 3.0.8 and ITS SR 3.0.5 have been added to reflect the use of the LCOs and SRs for dual unit sites. | LCO 3.0.8, SR 3.0.5 | N/A |
| | | | |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|-------------------------------|---|---|-----------------------|
| 3.1.1, SHUTDOWN MARGIN | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.1.1 | 3/4.3.A |
| A.2 | Changes the passive CTS 3.3.A Action 2 words of "verify...inserted," to the active ITS 3.1.1 Required Actions C.1 and D.1 "Initiate action to fully insert..." | 3.1.1 Required Actions C.1 and D.1 | 3.3.A Action 2 |
| A.3 | Deletes redundant actions of CTS 3.3.A Actions 2 and 3, which require suspension of activities that could reduce the SDM, when the SDM is not within limits in MODES 3, 4, or 5. In MODES 3 and 4, the vessel head is bolted in place, and the only activity that can significantly reduce SHUTDOWN MARGIN (SDM) is control rod withdrawal, for which a Required Action that ensures control rods remain inserted is provided. In MODE 5, the only activities that can affect SDM are CORE ALTERATIONS and control rod withdrawal, for which Required Actions are provided to suspend CORE ALTERATIONS and ensure control rods remain inserted. | N/A | 3.3.A Actions 2 and 3 |
| A.4 | Enhances presentation by requiring actions to be immediately initiated to restore secondary containment boundary (completing the actions as soon as possible) in lieu of current requirement to establish within 8 hours (initiating the actions as soon as possible). | 3.1.1 Required Actions D.2, D.3, D.4, E.3, E.4, and E.5 | 3.3.A Actions 2 and 3 |
| A.5 | Replaces the use of the defined term SECONDARY CONTAINMENT INTEGRITY with the essential elements of that definition. | 3.1.1 Required Actions D.2, D.3, D.4, E.3, E.4, and E.5 | 3.3.A Actions 2 and 3 |
| A.6 | Enhances presentation by requiring actions to be immediately initiated to insert all required control rods (completing the actions as soon as possible) in lieu of current requirement to insert the required control rods in 1 hour (initiating the actions as soon as possible). | 3.1.1 Required Action E.2 | 3.3.A Action 3 |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|---------------------------------------|--|------------------------------------|--------------|
| A.7 | A specific completion time for the SDM test is proposed to clarify <u>when</u> "prior to or during the first startup" applies. Most SDM tests are performed as an in-sequence critical and, therefore, 4 hours after reaching criticality is provided in ITS SR 3.1.1.1 as a reasonable time to perform the required calculations and have appropriate verification completed. | SR 3.1.1.1 <i><space></i> | 4.3.A.1 |
| A.8 | Replaces the activity referred to as "refueling" with "fuel movement within the reactor pressure vessel or control rod replacement, "since the intent of the Surveillance Requirement is to perform the SDM test after in-vessel activities which could have altered SDM. | SR 3.1.1.1 | 4.3.A.1 |
| A.9 | Moves the CTS 4.3.A.2 requirement to perform an SDM test after finding a stuck control rod to ITS 3.1.3. | 3.1.3 | 4.3.A.2 |
| 3.1.2, Reactivity Anomalies | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.1.2 | 3/4.3.B |
| A.2 | Changes "reactivity equivalence of the difference" to "reactivity difference." | LCO 3.1.2, SR 3.1.2.1 | 3.3.B, 4.3.B |
| A.3 | Adds a specific time for completing the reactivity anomaly surveillance to clarify <u>when</u> "during the first startup" the test must be performed. This test is performed by comparing the difference between the actual critical control rod configuration to the predicted critical control rod configuration as a function of cycle exposure while at steady state reactor power conditions. Therefore, "24 hours after reaching these conditions" is provided as a reasonable time to perform the required calculations and complete the appropriate verification, meeting the intent of the CTS. | SR 3.1.2.1 | 4.3.B.1 |
| 3.1.3, Control Rod OPERABILITY | | | |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|-------|--|------------------------------------|---|
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.1.3 | 4.3.A, 3/4.3.C, 3/4.3.D, 3/4.3.H, 3/4.3.I |
| A.2 | Reorganized the Control Rod OPERABILITY Specification to include all conditions that can affect the ability of the control rods to provide the necessary reactivity insertion. | 3.1.3 | 3/4.3.C |
| A.3 | Adds a Note, "Separate Condition entry is allowed for each control rod," which is consistent with the intent of the CTS. | 3.1.3 ACTIONS Note | 3.3.C Actions |
| A.4 | Adds a Note that allows for bypassing the RWM, if needed for continued operations. This note is informative in that the RWM may be bypassed at any time, provided the proper ACTIONS of CTS 3.3.L (ITS 3.3.2.1), the RWM Specification, are taken. | 3.1.3 Required Actions A.1 and C.1 | N/A |
| A.5 | Replaces "being immovable, as a result of excessive friction or mechanical interference, or known to be untrippable" with the term "stuck," since details of potential mechanisms by which control rods may be stuck are not necessary for inclusion within the Condition. | 3.1.3 Condition A | 3.3.C Action 1, 4.3.A.2 |
| A.6 | Deletes redundant phrase exempting SR on inoperable control rods since inoperable control rods are already not required to meet this Surveillance (per CTS 4.0.D). | SR 3.0.1 | 4.3.C.1 |
| A.7 | Surveillance that "cross-references" other Surveillances is deleted since the listed Surveillances are required by other Specifications. | N/A | 4.3.C.2 |
| A.8 | Deletes redundant provision allowing the directional control valves to be rearmed intermittently. | LCO 3.0.5 | 3.3.C Actions 1.a.2), 2.b, and 2.c footnote a, 3.3.H Action 1.b footnote b, 3.3.I Action 1.c footnote b |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|--------------------------------|--|---|----------------------------|
| A.9 | Moves the SDM allowance to the definition of SDM. | 1.1 SHUTDOWN MARGIN definition | 4.3.A.2 |
| A.10 | Presents the requirement that maximum control rod scram insertion time be ≤ 7 seconds in SR 3.1.3.4, making it a requirement for control rods to be considered OPERABLE, in lieu of an individual Specification. | SR 3.1.3.4 | 3.3.D |
| A.11 | Deletes the definition of time zero since it is duplicative of the definition of time zero in other CTS and maintained in footnote (a) to ITS Table 3.1.4-1. | Table 3.1.4-1 footnote (a) | 3.3.D |
| A.12 | Adds new SR to require SRs in ITS 3.1.4 to be performed, since CTS 4.3.D, which provides the scram time testing requirements, is addressed in ITS 3.1.4. | SR 3.1.3.4 | 4.3.D |
| A.13 | Presents the requirement that control rods be coupled to their drive mechanism in SR 3.1.3.5, making it a requirement for control rods to be considered OPERABLE, in lieu of an individual Specification. | SR 3.1.3.5 | 3.3.H |
| A.14 | Deletes CTS 3.3.H Action 1.a, which specifies the method of restoring coupling integrity to an uncoupled control rod. ITS does not explicitly detail options to "restore...to OPERABLE." This action is always an option, and is implied in the ITS ACTIONS. | LCO 3.0.2 | 3.3.H Action 1.a |
| A.15 | The separate Specification for control rod position is captured by the requirement that each control rod have at least one control rod position indication in SR 3.1.3.1. | SR 3.1.3.1 | 3.3.I |
| A.16 | Moves the requirements for control rod position indication during MODE 5 (refueling) to ITS 3.9.4. | 3.9.4 | 3.3.I |
| | | | |
| 3.1.4, Control Rod Scram Times | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.1.4 | 4.3.D, 3/4.3.E, 3/4.3.F |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|--|--|---------------------------------------|--------------------------------------|
| A.2 | Deletes a redundant provision that Specification 4.0.D is not applicable. | SR 3.0.4 | 4.3.D.2 footnote a |
| | | | |
| 3.1.5, Control Rod Scram Accumulators | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.1.5 | 3/4.3.G |
| A.2 | Moves the control rod scram accumulator OPERABILITY MODE 5 requirements to ITS 3.9.5. | 3.9.5 | 3/4.3.G |
| A.3 | Adds ITS Note, "Separate Condition entry is allowed for each control rod scram accumulator," which is consistent with the intent of the CTS. | 3.1.5 ACTIONS Note | 3.3.G |
| A.4 | The revised presentation of CTS 3.3.G Action 6 1.a.1) does not explicitly detail options to "restore...to OPERABLE status," since this action is always an option, and is implied in all Actions. | LCO 3.0.2 | 3.3.G Action 6 1.a.1) |
| A.5 | Deletes the "default" action "be in at least HOT SHUTDOWN within the next 12 hours" as there are no circumstances which preclude the possibility of compliance with an ACTION to "Declare the control rod...inoperable." | N/A | 3.3.G Action 1. 6 b |
| A.6 SR | Deletes the conditions which specify when the accumulator Surveillance does not have to be performed (i.e., when the associated control rod is inserted and disarmed or scrambled), since ITS LCO 3.0.1 provides the allowance. | LCO 3.0.1 SR | 4.3.G |
| A.7 | The method for verifying that a control rod drive pump is operating has been changed from inserting one control rod one notch to verifying that charging water header pressure is at least 940 psig. The proposed method for determining charging water header pressure provides added assurance that the charging water pressure is sufficient to insert all control rods, whereas the existing method only assures that one rod can be inserted. | 3.1.5 ACTIONS B and C | 3.3.G Action 1.c.1) |
| A.8 | CTS 3.3.G Action 1.c is redundant to the Actions of CTS 3.3.C (ITS 3.1.3), and has therefore been deleted. | 3.1.3 ACTIONS | 3.3.G Action 1.c |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|--|---|------------------------------|-------------|
| | | | |
| 3.1.6, Rod Pattern Control | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| 3.1.7, Standby Liquid Control System | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.1.7 | 3/4.4.A |
| A.2 | Deletes the requirement to verify the "power operated or automatic" valves since the only "power operated or automatic" valves in the system is the explosive valve. | N/A | 4.4.A.2.c |
| A.3 | Revises the details of CTS 4.4.A.2.b, which identify the available boron concentration to be determined to be 14% to 16.5% by weight, to be within the limits of Figure 3.1.7-1 (SR 3.1.7.5). | SR 3.1.7.5 Figure 3.1.7-1 | 4.4.A.2.b |
| | | | |
| 3.1.8, SDV Vent and Drain Valves | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.1.8 | 3/4.3.K |
| A.2 | Clarifies that the signal used for performing CTS 4.3.K.3.a and 4.3.K.3.b can be an "actual or simulated" signal. | SR 3.1.8.3 | N/A |
| | | | |
| Current Specification 3/4.3.J, Control Rod Drive Housing Support | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| Current Specification 3/4.3.N, Economic Generation Control System | | | |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|-------|---------|-------------|-------------|
| NONE | NONE | NONE | NONE |
| | | | |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|---|---|-------------|-------------|
| 3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE | | | |
| A.1 | Editorial changes, reformatting, and revised renumbering. | 3.2.1 | 3/4.11.A |
| A.2 | Deletes "OPERATIONAL MODE 1" from the Applicability of "OPERATIONAL MODE 1, when THERMAL POWER is greater than or equal to 25% of RATED THERMAL POWER," since with THERMAL POWER \geq 25% RTP, the unit will always be in MODE 1. | N/A | 3.11.A |
| | | | |
| 3.2.2, MINIMUM CRITICAL POWER RATIO | | | |
| A.1 | Editorial changes, reformatting, and revised renumbering. | 3.2.2 | 3/4.11.C |
| A.2 | Deletes "OPERATIONAL MODE 1" from the Applicability of "OPERATIONAL MODE 1, when THERMAL POWER is greater than or equal to 25% of RATED THERMAL POWER," since with THERMAL POWER \geq 25% RTP, the unit will always be in MODE 1. | N/A | 3.11.C |
| | | | |
| 3.2.3, LINEAR HEAT GENERATION RATE | | | |
| A.1 | Editorial changes, reformatting, and revised renumbering. | 3.2.3 | 3/4.11.D |
| A.2 | Deletes "OPERATIONAL MODE 1" from the Applicability of "OPERATIONAL MODE 1, when THERMAL POWER is greater than or equal to 25% of RATED THERMAL POWER," since with THERMAL POWER \geq 25% RTP, the unit will always be in MODE 1. | N/A | 3.11.D |
| | | | |
| 3.2.4, AVERAGE POWER RANGE MONITOR GAIN AND SETPOINT | | | |
| A.1 | Editorial changes, reformatting, and revised renumbering. | 3.2.4 | 3/4.11.B |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|-------|---|----------------|-----------------|
| A.2 | Revises the LCO to provide the details which are specified in the CTS 3.11.B Actions for an allowance to adjust the flow biased APRM setpoints or to adjust each APRM gain when FDLRC or MFLPD/F RTP is greater than 1.0. | 3.2.4 | 3.11.B |
| A.3 | Deletes duplicate details of the FUEL DESIGN LIMITING RATIO FOR CENTERLINE MELT (FDLRC) definition in ITS Section 1.1. | N/A | 3.11.B |
| A.4 | Deletes "OPERATIONAL MODE 1" from the Applicability of "OPERATIONAL MODE 1, when THERMAL POWER is greater than or equal to 25% of RATED THERMAL POWER," since with THERMAL POWER \geq 25% RTP, the unit will always be in MODE 1. | N/A | 3.11.B |
| A.5 | Revises the reference to the "setpoints" of the APRM Flow Biased Neutron Flux — High trip to "Allowable Value." | 3.2.4 ACTION A | 3.11.B Action 2 |
| | | | |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|-------------------------------------|--|--|---|
| 3.3.1.1, RPS Instrumentation | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.3.1.1 | 3/4.1.A, 2.2 |
| A.2 | Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel" and revises the wording for CTS Actions 1, 2 and 3 ("One or more required channels" and "One or more Functions"), which is consistent with the intent of the CTS. | 3.3.1.1 ACTIONS Note 1, 3.3.1.1 ACTIONS A, B, and C | 3.1.A Actions |
| A.3 | These changes to CTS 3/4.1.A are provided in the Quad Cities ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter dated December 27, 1999. | 3.3.1.1 ACTIONS A, B, C, and D, Surveillance Requirements Note 2, SR 3.3.1.1.5, SR 3.3.1.1.10, SR 3.3.1.1.11 | 3/4.1.A |
| A.4 | RPS trip capability not maintained replaces the explicit reference to Functional Units 1 through 12 in CTS 3.1.A Actions 1 and 2 have been deleted. Each of these Functional Units are automatically actuated when the parameter exceeds the associated trip setpoint and each of these Functions include four redundant channels and the loss of one channel in each trip system does not result in a loss of function. In addition, the explicit reference in CTS 3.1.A Action 3 to Functional Units 13 or 14 have been deleted, since Functions (Reactor Mode Switch Shutdown Position and Manual Scram) do not include four redundant channels, thus ITS 3.3.1.1 ACTION C (RPS trip capability not maintained) is required when any of the associated channels are found to be inoperable. | N/A | 3.1.A Actions 1, 2, and 3 |
| A.5 | Moves the CTS Table 3.1.A-1 footnote (g) and CTS Table 4.1.A-1 footnote (m) requirement that the APRM Functional Units 2.a and 2.d be Operable during shutdown margin demonstrations performed per Specification 3.12.B to ITS 3.10.7. | 3.10.7 | Table 3.1.A-1 footnote (g), Table 4.1.A-1 footnote (m) |

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

| | | | |
|------|---|----------------------------|--|
| A.6 | CTS Table 3.1.A-1 footnote (f) and CTS Table 4.1.A-1 footnote (i) state that the Reactor Vessel Steam Dome Pressure — High Function (Functional Unit 3) is not required to be OPERABLE in MODE 2 when the reactor vessel head is removed per CTS 3.12.A. CTS Table 3.1.A-1 footnote (h) and CTS Table 4.1.A-1 footnote (n) state that the Drywell Pressure — High Function (Functional Unit 7) is not required to be OPERABLE in MODE 2 when PRIMARY CONTAINMENT INTEGRITY is not required in MODE 2 (i.e., when Special Test Exception 3/4.12.A is being used). These notes are deleted from CTS Tables 3.1.A-1 and 4.1.A-1 since the only applicable condition in which these notes would be needed has been deleted. | N/A | Table 3.1.A-1 footnotes (f) and (h), Table 4.1.A-1 footnotes (i) and (n) |
| A.7 | All MSIV channels are required to be OPERABLE to assure a scram with the worst case single failure. In the ITS, each MSIV contact is viewed as a separate channel (a total of 16 channels). Therefore, the minimum number of channels per trip system is more appropriately specified as "8" in Function 5 of ITS Table 3.3.1.1-1. | Table 3.3.1.1-1 Function 5 | Table 3.1.A-1 Functional Unit 5 |
| A.8 | These changes to CTS 3/4.1.A and 2.2.A are provided in the Quad Cities ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter dated December 30, 1999. | N/A | 3/4.1.A, 2.2.A |
| A.9 | Removes the cross references to the Special Operations LCOs due to the change described in DOC L.4 for ITS 3.3.1.1. | N/A | Table 3.1.A-1 footnote (i), Table 4.1.A-1 footnote (j) |
| A.10 | Replaces the term "Trip Setpoints" with "Allowable Values," since current plant practice uses the Trip Setpoints as the Operability limit (i.e., consistent with the use of the term "Allowable Values" in the ITS). Changes to instrument setpoint values are addressed in other DOCs. | Table 3.3.1.1-1 | 2.2.A, 2.2.A Action, Table 2.2.A-1 |
| A.11 | Not used. | 3.3.1.1 Required Action 1 | |
| A.12 | Removes the CHANNEL FUNCTIONAL TEST Surveillance Frequency of "S/U" and footnote (c) of CTS Table 4.1.A-1 for Functional Units 1.a and 2.a "within 24 hours before startup, if not performed within the previous 7 days." These notations are redundant to the requirements of proposed SR 3.0.4, which requires the periodic weekly Surveillances to be performed and current prior to entry into the applicable operational conditions. | SR 3.0.4 | Table 4.1.A-1 Functional Units 1.a and 2.a Frequency and footnote (c) |

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1

Insert A.11

Table 3.1.A-1
Actions 13 and 14

INSERT A.11

Enhances presentation by requiring actions to be immediately initiated to insert control rods (completing the actions as soon as possible) in lieu of current requirement to insert the control rods in 1 hour (initiating the actions as soon as possible).

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | |
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| A.13 | Deletes the daily (D - 24 hours) CHANNEL CHECK Frequency for CTS Table 4.1.A-1 Functional Unit 2.b, since it is already covered by the shiftly (S - 12 hours) CHANNEL CHECK Frequency of Table 4.1.A-1 Functional Unit 2.b. | N/A | 4.1.A.1 for Table 4.1.A-1 Functional Unit 2.b |
| A.14 | The CTS Limiting Safety System Settings (Setpoints) Table 2.2.A-1 has been combined with the current RPS Technical Specification (CTS 3/4.1.A). The information in CTS Table 2.2.A-1 is located in ITS Table 3.3.1.1-1. | 3.3.1.1, Table 3.3.1.1-1 | Table 2.2.A-1, 3/4.A.1 |
| A.15 | Modifies the reference point for the Reactor Vessel Water Level - Low Function from top of active fuel to instrument zero. | Table 3.3.1.1-1 Function 4 | Table 2.2.A-1 Functional Unit 4 |
| A.16 | The requirements in CTS Table 4.1.A-1 footnote (q) have been deleted since the instrument upgrades, referenced in the footnote, for both Units 1 and 2 have been completed. | N/A | Table 4.1.A-1 footnote (q) |
| 3.3.1.2, SRM Instrumentation | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.3.1.2 | 3/4.2.G, 3/4.10.B |
| A.2 | CTS requirements to "verify all insertable control rods...inserted," are replaced in ITS 3.3.1.2 Required Action D.1 with an equivalent but more definitive requirement to "Fully insert...." | 3.3.1.2 Required Action D.1 | 3.2.G Action 2 |
| A.3 | Adds a Note to the Surveillance Requirements to provide direction for proper application of the Surveillance Requirements for Technical Specification compliance. | 3.3.1.2 Surveillance Requirements Note | N/A |
| A.4 | Adds to the CTS 3.10.B Action the phrase, "except for control rod insertion." CTS and ITS definition of a CORE ALTERATION includes control rod insertion and to comply with the CTS action to suspend CORE ALTERATIONS means to stop any <u>additional</u> CORE ALTERATIONS, but not control rod insertion. | 3.3.1.2 ACTION E | 3.10.B Action |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

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| | | | |
| 3.3.2.1, Control Rod Block Instrumentation | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.3.2.1 | 3/4.2.E, 3/4.3.L, 3/4.3.M |
| A.2 | Replaces the term "Trip Setpoints" with "Allowable Values," since current plant practice uses the Trip Setpoints as the Operability limit (i.e., consistent with the use of the term "Allowable Values" in the ITS). Changes to instrument setpoint values are addressed in other DOCs. | Table 3.3.2.1-1 | 3.2.E, 3.2.E Action 1, Table 3.2.E-1 |
| A.3 | The reference to "OPERATIONAL CONDITION 1, when THERMAL POWER is greater than or equal to 30% of RATED THERMAL POWER" is not used in the ITS. In both the CTS and ITS with THERMAL POWER \geq 30% RTP, the unit will always be in MODE 1 (Operational Condition 1). In addition, CTS Tables 3.2.E-1 and 4.2.E-1 footnotes (e) and (d), respectively and LCO 3.3.M (ITS Table 3.3.2.1-1 Note (a)) have been modified to not require the RBM to be Operable when a peripheral control rod is selected, since this Note explains the RBM design feature which includes an automatic bypass when a peripheral rod is selected. | Table 3.3.2.1-1 Functions 1.a, 1.b, and 1.c, and Note (a) | Tables 3.2.E-1 and 4.2.E-1 Functional Units 1.a, 1.b, and 1.c, including ^(e) footnotes ^(d) and ^(e) respectively, 3.3.M |
| A.4 | These changes to CTS 3/4.2.E are provided in Quad Cities ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter dated December 27, 1999. | 3.3.2.1 Surveillance Requirements Note 2, SR 3.3.2.1.1 | 3/4.2.E |
| | | | |
| 3.3.2.2, Feedwater System and Main Turbine High Water Level Trip Instrumentation | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.3.2.2 | 3/4.2.J |
| A.2 | Replaces the term "Trip Setpoint" with "Allowable Value," since current plant practice uses the Trip Setpoint as the Operability limit (i.e., consistent with the use of the term "Allowable Value" in the ITS). Changes to instrument setpoint values are addressed in other DOCs. | SR 3.3.2.2.1 3 | 3.2.J, 3.2.J Action, Table 3.2.J-1 |

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

Table 3.2.F-1
Instrumentation 2

| | | | |
|---|---|--|--|
| A.3 | Modifies the reference point for the Reactor Vessel Water Level - Low Function from top of active fuel to instrument zero. | SR 3.3.2.2.3 | Table 3.2.J-1 Functional Unit |
| 3.3.3.1, Post Accident Monitoring Instrumentation | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.3.3.1 | 3/4.2.F |
| A.2 | Adds ITS ACTIONS Note "Separate Condition entry is allowed for each Function," which is consistent with the intent of the CTS. | 3.3.3.1 ACTIONS Note 2 | 3.2.F Actions |
| A.3 | Not used. | | |
| A.4 | Moves the details concerning the technical content of the Special Report specified in CTS 3.2.F-1 Action 61.b) to ITS 5.6. | 5.6 | Table 3.2.F-1 Action 61.b |
| 3.3.4.1, ATWS-RPT Instrumentation | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.3.4.1 | 3/4.2.C |
| A.2 | Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS. | 3.3.4.1 ACTIONS Note | 3.2.C Actions |
| A.3 | These changes to CTS 3/4.2.C are provided in Quad Cities ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter dated December 27, 1999. | 3.3.4.1 Surveillance Requirements Note, SR 3.3.4.1.3 | 3/4.2.C |
| A.4 | Replaces the term "Trip Setpoints" with "Allowable Values," since current plant practice uses the Trip Setpoints as the Operability limit (i.e., consistent with the use of the term "Allowable Values" in the ITS). Changes to instrument setpoint values are addressed in other DOCs. | SR 3.3.4.1.4 | 3.2.C, 3.2.C Action, Table 3.2.C-1 |

Table 3.3.3-1
Functions
2.a and 2.b

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The Reactor Vessel Water Level instrumentation in CTS Table 3.2.F-1 consists of instruments with different ranges to satisfy Regulatory Guide 1.97 requirements. The different ranges are: "narrow range" covering approximately 82 inches above the top of active fuel to approximately 202 inches above the top of active fuel; and "wide range" covering approximately 202 inches above the top of active fuel to approximately 198 inches below the top of active fuel. Currently, CTS Table 3.2.F-1 only specifies requirements for two channels but does not specify the required ranges. Using the ITS format, the instruments required to cover these ranges are delineated in ITS Table 3.3.3.1-1 as separate line items under Function 2, with each channel consisting of only one instrument. Therefore, ITS Table 3.3.3.1-1 Function 2.a (Wide Range) and Function 2.b (Narrow Range) will each specify requirements for two channels (for a total of 4 channels).

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | |
|--------------------------------------|---|---|--|
| A.5 | Modifies the reference point for the Reactor Vessel Water Level - Low Function from top of active fuel to instrument zero. | SR 3.3.4.1.4 | Table 3.2.C-1 Functional Unit 1 |
| 3.3.5.1, ECCS Instrumentation | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.3.5.1 | 3/4.2.B |
| A.2 | Replaces the term "Trip Setpoints" with "Allowable Values," since current plant practice uses the Trip Setpoints as the Operability limit (i.e., consistent with the use of the term "Allowable Values" in the ITS). Changes to instrument setpoint values are addressed in other DOCs. | Table 3.3.5.1-1 | 3.2.B, 3.2.B Action 1, Table 3.2.B-1 |
| A.3 | Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS. | 3.3.5.1 ACTIONS Note | 3.2.B Actions |
| A.4 | Modifies the reference point for the Reactor Vessel Water Level - Low Function from top of active fuel to instrument zero. | Table 3.3.5.1-1 Functions 1.a, 2.a, 3.a, 3.c, 4.a, and 5.a | Table 3.2.B-1 Functional Units 1.a, 2.a, 3.a, 3.c, 4.a, and 5.a |
| A.5 | Modifies the reference point for the Condensate Storage Tank—Low Function from gallons to feet and inches plant elevation. | Table 3.3.5.1-1, Function 3.d | Table 3.2.B-1, Functional Unit 3.c |
| A.6 | CTS Table 3.2.B-1 footnote (f) and CTS Table 4.2.B-1 footnote (d) state that the Drywell Pressure—High Function (Functional Units 1.b, 2.b, 3.b, 4.b, and 5.b) is not required to be OPERABLE when PRIMARY CONTAINMENT INTEGRITY is not required in MODE 2 (i.e., when Special Test Exception 3/4.12.A is being used). These notes are deleted from CTS Tables 3.2.B-1 and 4.2.B-1 since the only applicable condition in which these notes would be needed has been deleted. | N/A | Table 3.2.B-1 footnote (f), Table 4.2.B-1 footnote (d) |
| A.7 | The detail in CTS Table 3.2.B-1 Functional Unit 3.g, HPCI Manual Initiation, that there is one channel "per system" has been deleted since there is only one HPCI System per unit. | N/A | Table 3.2.B-1 Functional Unit 3.g |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | |
|------|---|--|---|
| A.8 | These changes to CTS 3/4.2.B are provided in Quad Cities ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter dated December 27, 1999. | 3.3.5.1 ACTIONS B, C, D, E, F, G, and H, 3.3.5.1 Surveillance Requirements Note 2, SR 3.3.5.1.3, SR 3.3.5.1.4, SR 3.3.5.1.5 | 3/4.2.B |
| A.9 | Moves the technical content of the loss of power instrumentation requirements of CTS Table 3.2.B-1 Functional Units 6.a and 6.b, including Action 36 and footnotes (e), (g), and (j), and CTS Table 4.2.B-1, Functional Units 5.a and 5.b, including footnote (c), to ITS 3.3.8.1, "Loss of Power Instrumentation." | 3.3.8.1 | Table 3.2.B-1 Functional Units 6.a and 6.b including Action 36 and footnotes (e), (g), and (j), CTS Table 4.2.B-1, Functional Units 5.a and 5.b, including footnote (c) |
| A.10 | Adds a Required Action to allow the HPCI pump suction to be aligned to the suppression pool in lieu of tripping the channel, if a Condensate Storage Tank Level—Low or Suppression Pool Water Level—High channel is inoperable. This allowance manually performs the instrumentation function. | 3.3.5.1 Required Action D.2.2 | Table 3.2.B-1 Action 35 |
| A.11 | Replaces the CHANNEL FUNCTIONAL TEST of Table 4.2.B-1 Functional Unit 3.g (the HPCI Manual Initiation Function) with a LOGIC SYSTEM FUNCTIONAL TEST in ITS 3.3.5.1, which is a complete test of the logic, including the Manual Initiation switch, and is performed at the same Frequency. | N/A | 4.2.B.1 for Table 4.2.B-1 Functional Unit 3.g |

TABLE A - ADMINISTRATIVE CHANGES MATRIX
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| A.12 | Deletes the specific CHANNEL FUNCTIONAL TEST requirement for Functional Unit 4.c, ADS Initiation Timer, and Functional Unit 4.d, ADS Low Low Level Timer, since the CFT is included in the CTS and ITS definition of CHANNEL CALIBRATION and the CFT and the CHANNEL CALIBRATION are performed at the same Frequency. | N/A | 4.2.B.1 for Table 4.2.B-1 Functional Units 4.c and 4.d |
| | | | |
| 3.3.5.2, RCIC System Instrumentation | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.3.5.2 | 3/4.2.D |
| A.2 | Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS. | 3.3.5.2 ACTIONS Note | 3.2.D Actions |
| A.3 | Modifies the reference point for the Reactor Vessel Water Level - Low Function from top of active fuel to instrument zero. | Table 3.3.5.2-1 Functions 1 and 2 | Table 3.2.D-1 Functional Units 1 and 2 |
| A.4 | These changes to CTS 3/4.2.D are provided in Quad Cities ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter dated December 27, 1999. | 3.3.5.2 ACTIONS B, C, D, and E, 3.3.5.2 Surveillance Requirements Note 2, SR 3.3.5.2.3, SR 3.3.5.2.4 | 3/4.2.D |
| A.5 | Adds a Required Action to allow the RCIC pump suction to be aligned to the suppression pool in lieu of tripping the channel, if a Condensate Storage Tank Level—Low or Suppression Pool Water Level—High channel is inoperable. | 3.3.5.2 Required Action D.2.2 | Table 3.2.D-1 Action 42 |

This allowance manually performs the instrumentation function.

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**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

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| A.6 | The column title in CTS Table 3.2.D-1 is on a per Function basis rather than the per Trip System basis indicated in CTS Table 3.2.D-1 Actions 41 and 43. All required channels are specified in the column. Therefore, reference to Trip System has been deleted and replaced with Function as indicated in ITS Table 3.3.5.2-1. | Table 3.3.5.2-1 | Table 3.2.D-1 Actions 41 and 43 |
| A.7 | Replaces the CHANNEL FUNCTIONAL TEST of Table 4.2.D-1 Functional Unit 5 (the RCIC Manual Initiation Function) with a LOGIC SYSTEM FUNCTIONAL TEST in ITS 3.3.5.2, which is a complete test of the logic, including the Manual Initiation switch, and is performed at the same Frequency. | N/A | 4.2.D.1 for Table 4.2.D-1 Functional Unit 5 |
| A.8 | Replaces the term "Trip Setpoints" with "Allowable Values," since current plant practice uses the Trip Setpoints as the Operability limit (i.e., consistent with the use of the term "Allowable Values" in the ITS). Changes to instrument setpoint values are addressed in other DOCs. | Table 3.3.5.2-1 | 3.2.D, 3.2.D Action 1, Table 3.2.D-1 |
| A.9 | The detail in CTS Table 3.2.D-1 Functional Unit 5, RCIC Manual Initiation, that there is one channel "per system" has been deleted since there is only one RCIC System per unit. | N/A | Table 3.2.D-1 Functional Unit 5 |
| | | | |
| 3.3.6.1, Primary Containment Isolation Instrumentation | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.3.6.1 | 3/4.2.A |
| A.2 | Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," and revises the wording for CTS Action 2 ("One or more channels" and "One or more automatic Functions"), which is consistent with the intent of the CTS. | 3.3.6.1 ACTIONS Note and ACTIONS A and B | 3.2.A Action 2 |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | |
|-----|---|--|--|
| A.3 | These changes to CTS 3/4.2.A are provided in Quad Cities ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter dated December 27, 1999. | 3.3.6.1 ACTIONS A, B, and C, 3.3.6.1 Surveillance Requirements Note 2, SR 3.3.6.1.2, SR 3.3.6.1.3 | 3/4.2.A |
| A.4 | CTS Table 3.2.A-1 footnote (d) and CTS Table 4.2.A-1 footnote (b) state that the Drywell Pressure—High Function (Functional Unit 1.b) is not required to be OPERABLE when PRIMARY CONTAINMENT INTEGRITY is not required in MODE 2 (i.e., when Special Test Exception 3/4.12.A is being used). These notes are deleted from CTS Tables 3.2.A-1 and 4.2.A-1 since the only applicable condition in which these notes would be needed has been deleted. | N/A | Table 3.2.A-1 footnote (d), Table 4.2.A-1 footnote (b) |
| A.5 | Moves the requirements identified in CTS Tables 3.2.A-1 and 4.2.A-1 related to Secondary Containment Isolation and Control Room Emergency Ventilation actuation (as described in footnotes (c), (d), (k), *, and ** to Table 3.2.A-1 and footnotes (b), (c), (d), *, and ** to Table 4.2.A-1) to ITS 3.3.6.2, "Secondary Containment Isolation Instrumentation," and ITS 3.3.7.1, "Control Room Emergency Ventilation System Instrumentation," as applicable. | 3.3.6.2, 3.3.7.1 | Tables 3.2.A-1 (including footnotes (c), (d), (k), *, and **) and 4.2.A-1 (including footnotes (b), (c), (d), *, and **) |
| A.6 | These changes to CTS 3/4.2.A are provided in the Quad Cities ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter dated December 30, 1999. | N/A | 3/4.2.A |
| A.7 | Replaces the term "Trip Setpoints" with "Allowable Values," since current plant practice uses the Trip Setpoints as the Operability limit (i.e., consistent with the use of the term "Allowable Values" in the ITS). Changes to instrument setpoint values are addressed in other DOCs. | Table 3.3.6.1-1 | 3.2.A, 3.2.A Action 1, Table 3.2.A-1 |
| A.8 | The CTS action to "declare the affected system inoperable" is deleted since this instruction is essentially a "cross reference" between Technical Specifications. | N/A | Table 3.2.A-1 Action 23 |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

4.3.2.1 for

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|---|--|--|---|
| A.9 | The requirement in CTS Table 3.2.A-1 footnote (g) that only one trip system is required in MODES 4 and 5 with RHR Shutdown Cooling System integrity maintained has been revised for clarification. The ITS requires one channel per trip system, which is the intent of the requirement. | Table 3.3.6.1-1 Note (b) | Table 3.2.D-1 footnote (g) |
| A.10 | Replaces the CHANNEL FUNCTIONAL TEST of Table 4.2.A-1 Functional Unit 4.a, Standby Liquid Control (SLC) System Initiation, with a LOGIC SYSTEM FUNCTIONAL TEST in ITS 3.3.6.1, which is a complete test of the logic, including the switches, and is performed at the same Frequency. | SR 3.3.6.1.7 | Table 4.2.A-1 Functional Unit 4.a |
| A.11 | CTS Table 3.2.A-1 requires Functional Unit 3.e, Main Steam Line (MSL) Tunnel Temperature—High, to have at least 2 channels (of the 4) in each of 2 sets OPERABLE per trip system. In the ITS, this requirement is clarified by replacing the words "2 of 4 in each of 2 sets" with "2 per trip string" such that the requirement is consistent with the terminology used in BWR ISTS, NUREG-1433, Rev. 1, for describing other similar trip logic schemes. | Table 3.3.6.1-1 Function 1.e | Table 3.2.A-1 Functional Unit 3.e |
| A.12 | Modifies the reference point for the Reactor Vessel Water Level - Low and Reactor Vessel Water Level - Low Functions from top of active fuel to instrument zero. | Table 3.3.6.1-1 Functions 1.a, 2.a, 5.b, and 6.b | Table 3.2.A-1 Functional Units 1.a, 3.a, 4.b, and 7.a |
| 3.3.6.2, Secondary Containment Isolation Instrumentation | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.3.6.2 | 3/4.2.A, 4.7.P.4.b.2) |
| A.2 | Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," and revises the wording for CTS Action 2 ("One or more channels" and "One or more automatic Functions"), which is consistent with the intent of the CTS. | 3.3.6.2 ACTIONS Note and ACTIONS A and B | 3.2.A Action 2 |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

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|--|--|--|---|
| A.3 | These changes to CTS 3/4.2.A are provided in Quad Cities ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter dated December 27, 1999. | 3.3.6.2 ACTIONS A, B, and C, 3.3.6.2 Surveillance Requirements Note 2, SR 3.3.6.2.2, SR 3.3.6.2.3 | 3/4.2.A |
| A.4 | The CTS replaces the use of the term SECONDARY CONTAINMENT INTEGRITY with the elements of that term and clarifies the need to isolate SCIVs and start the associated SGT subsystem(s). | 3.3.6.2 Required Actions C.1.1 and C.2.1 | Table 3.2.A-1 Action 24 |
| A.5 | CTS Table 3.2.A-1 footnote (d) and CTS Table 4.2.A-1 footnote (b) state that the Drywell Pressure—High Function (Functional Unit 2.b) is not required to be OPERABLE when PRIMARY CONTAINMENT INTEGRITY is not required in MODE 2 (i.e., when Special Test Exception 3/4.12.A is being used). These notes are deleted from CTS Tables 3.2.A-1 and 4.2.A-1 since the only applicable condition in which these notes would be needed has been deleted. | N/A | Table 3.2.A-1 footnote (d), Table 4.2.A-1 footnote (b) |
| A.6 | Replaces the term "Trip Setpoints" with "Allowable Values," since current plant practice uses the Trip Setpoints as the Operability limit (i.e., consistent with the use of the term "Allowable Values" in the ITS). Changes to instrument setpoint values are addressed in other DOCs. | Table 3.3.6.2-1 | 3.2.A, 3.2.A Action 1, Table 3.2.A-1 |
| A.7 | Modifies the reference point for the Reactor Vessel Water Level - Low Function from top of active fuel to instrument zero. | Table 3.3.6.2-1 Function 1 | Table 3.2.A-1 Functional Unit 2.a |
| | | | |
| 3.3.6.3, Relief Valve Instrumentation | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.3.6.3 | 3/4.6.F |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | |
|---|---|--|--|
| A.2 | Adds a Note to provide direction for proper application of the Surveillance Requirements to ensure Technical Specification compliance, consistent with the intent of the CTS. | 3.3.6.3 Surveillance Requirements Note | 4.0.F <u>6</u> |
| A.3 | Replaces the term "Setpoints" with "Allowable Values," since current plant practice uses the Setpoints as the Operability limit (i.e., consistent with the use of the term "Allowable Values" in the ITS). Changes to instrument setpoint values are addressed in other DOCs. | Table 3.3.6.3-1 Functions 1.a and 2.a | 3.6.F |
| A.4 | Deletes the CTS 4.6.F.1.a CHANNEL FUNCTIONAL TEST requirement since it is redundant to the CTS 4.6.F.1.b LOGIC SYSTEM FUNCTIONAL TEST requirement performed at the same Frequency. <u>6</u> | SR 3.3.6.3.2 | 4.0.F.1.a <u>6</u> |
| 3.3.7.1, CREV System Isolation Instrumentation | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.3.7.1 | 3/4.2.A |
| A.2 | Replaces the term "Trip Setpoints" with "Allowable Values," since current plant practice uses the Trip Setpoints as the Operability limit (i.e., consistent with the use of the term "Allowable Values" in the ITS). Changes to instrument setpoint values are addressed in other DOCs. | Table 3.3.7.1-1 | 3.2.A, 3.2.A Action 1, Table 3.2.A-1 |
| A.3 | Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS. | 3.3.7.1 ACTIONS Note | 3.2.A Actions |
| A.4 | These changes to CTS 3/4.2.A are provided in Quad Cities ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter dated December 27, 1999. | 3.3.7.1 ACTIONS A, B, C, and D, 3.3.7.1 Surveillance Requirements Note 2, SR 3.3.7.1.2, SR 3.3.7.1.3 | 3/4.2.A |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | |
|---|--|-----------------------------|---|
| A.5 | ITS 3.3.7.1 includes only the requirements for the Control Room Emergency Ventilation System isolation instrumentation. However, CTS Tables 3.2.A-1 and Functional Units 2.a, 2.b, 2.c, and 2.d also provide the secondary containment isolation actuation instrumentation requirements, and CTS Tables 3.2.A-1 and 4.2.A-1 Functional Unit 3.d provides Main Steam Line Isolation actuation instrumentation requirements. The requirements for the isolation requirements of the secondary containment and the main steam isolation valves are retained in ITS 3.3.6.2 and ITS 3.3.6.1, respectively. | 3.3.6.1, 3.3.6.2 | Tables 3.2.A-1 and 4.2.A-1 Functional Units 2.a, 2.b, 2.c, 2.d, and 3.d |
| A.6 | CTS Table 3.2.A-1 footnote (d) and CTS Table 4.2.A-1 footnote (b) state that the Drywell Pressure—High Function (Functional Unit 2.b) is not required to be OPERABLE when PRIMARY CONTAINMENT INTEGRITY is not required in MODE 2 (i.e., when Special Test Exception 3/4.12.A is being used). These notes are deleted from CTS Tables 3.2.A-1 and 4.2.A-1 since the only applicable condition in which these notes would be needed has been deleted. | N/A | Table 3.2.A-1 footnote (d), Table 4.2.A-1 footnote (b) |
| A.7 | Modifies the reference point for the Reactor Vessel Water Level - Low Function from top of active fuel to instrument zero. | Table 3.3.7.1-1 Function 1 | Table 3.2.A-1 Functional Unit 2.a |
| 3.3.7.2, Mechanical Vacuum Pump Trip Instrumentation | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.3.7.2 | 3/4.2.L |
| A.2 | These changes to CTS 3/4.2.L are provided in the Quad Cities ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter dated December 30, 1999. | 3.3.7.2 | 3/4.2.L |
| A.3 | Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS. | 3.3.7.2 ACTIONS Note | 3.2.L Actions |
| A.4 | Adds an action to restore the channel to Operable status, since this action is always an option. | 3.3.7.2 Required Action A.1 | N/A |


**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | |
|---|--|----------------------|--------------------------------------|
| A.5 | Replaces the term "trip setpoint" with "Allowable Value," since current plant practice uses the Trip Setpoint as the Operability limit (i.e., consistent with the use of the term "Allowable Value" in the ITS). Changes to instrument setpoint values are addressed in other DOCs. | SR 3.3.7.2.4 | 4.2.L.3 |
| A.6 | These changes to CTS 3/4.2.L are provided in Quad Cities ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter dated December 27, 1999. | SR 3.3.7.2.2 | 3/4.2.L |
| A.7 | Revises Trip Setpoint/Allowable Value units from normal background measured during full power operation without hydrogen being injected to mR/hr. | SR 3.3.7.2.4 | 4.2.L.3 including footnote (b) |
| | | | |
| 3.3.8.1, Loss of Power Instrumentation | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.3.8.1 | 3/4.2.B |
| A.2 | A new LCO, ITS 3.3.8.1, has been written specifically for the Loss of Power (LOP) Instrumentation. The LOP Function from the current ECCS instrumentation Specification (CTS 3/4.2.B) is incorporated into this LCO. ITS 3.3.8.1 requires the instruments listed in ITS Table 3.3.8.1-1 to be OPERABLE, and the Table has the appropriate Functions from CTS Table 3.2.B-1 listed. | 3.3.8.1 | 3/4.2.B |
| A.3 | Replaces the term "Trip Setpoints" with "Allowable Values," since current plant practice uses the Trip Setpoints as the Operability limit (i.e., consistent with the use of the term "Allowable Values" in the ITS). Changes to instrument setpoint values are addressed in other DOCs. | Table 3.3.8.1-1 | 3.2.B, 3.2.B Action 1, Table 3.2.B-1 |
| A.4 | Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS. | 3.3.8.1 ACTIONS Note | 3.2.B Actions |
| A.5 | Deletes references to "take the ACTION required by..." in CTS Table 3.2.B-1 Action 36, since the format of the ITS does not include providing "cross references." The individual Specifications adequately prescribe the Required Actions for inoperable systems, subsystems, trains, components, and devices without such references. | N/A | Table 3.2.B-1 Action 36 |
| | | | |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| 3.3.8.2, RPS Electric Power Monitoring | | | |
|--|---|------------------|-----------------------|
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.3.8.2 | 3/4.9.G |
| A.2 | The revised presentation of CTS 3.9.G Actions 1 and 2 does not explicitly detail options to "restore...to OPERABLE status," since this action is always an option, and is implied in all Actions. | LCO 3.0.2 | 3.9.G Actions 1 and 2 |
| A.3 | A new ACTION is provided that requires a shutdown if the Required Actions of Condition A or B are not met when the unit is in MODE 1, 2, or 4. This action is functionally equivalent to the CTS 3.0.C, which is currently required if CTS 3.9.G Actions 1 and 2 are not met (although CTS 3.0.C does provide an additional 1 hour to commence the shutdown). | 3.3.8.2 ACTION C | 3.9.G Actions 1 and 2 |
| A.4 | Replaces the term "setpoints" with "Allowable Values," since current plant practice uses the setpoints as the Operability limit (i.e., consistent with the use of the term "Allowable Values" in the ITS). Changes to instrument setpoint values are addressed in other DOCs. | SR 3.3.8.2.2 | 4.9.G.2 |
| | | | |
| Current Specification 3/4.2.H, Explosive Gas Monitoring | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| Current Specification 3/4.2.I, Suppression Chamber and Drywell Spray Actuation | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| Current Specification 3/4.2.K, Toxic Gas Monitoring | | | |
| NONE | NONE | NONE | NONE |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|---|--|-----------------------|---|
| 3.4.1, Recirculation Loops Operating | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.4.1 | 3/4.6.A, 3/4.6.C |
| A.2 | CTS 3.6.A has been rewritten into two distinct options, with the first option requiring two recirculation loops and the second option only requiring one recirculation loop with the added requirements of CTS 3.6.A ACTIONS 1.b, 1.c and 1.d. Similarly, the Applicability of CTS 3.6.C has been changed from OPERATIONAL MODE(s) 1 and 2 during two loop operation to MODES 1 and 2 (ITS 3.4.1) since the first option in proposed ITS LCO 3.4.1 requires two recirculation loops with match flows to be in operation. | 3.4.1, 3.4.1 ACTION C | 3.6.A ACTIONS 1.b, 1.c, and 1.d, 3.6.C  |
| A.3 | Deletes the requirement to increase the MCPR safety limit per CTS 2.1.B when only one recirculation loop is in operation, since the Safety Limit requirement is currently specified as the single loop limit; thus, when the plant is in single loop, the limit applies immediately, not in 24 hours as allowed by CTS 3.6.A Action 1.a. | N/A | 3.6.A Action 1.a |
| A.4 | Deletes the requirement to reduce the Average Power Range Monitor (APRM) Rod Block Trip Setpoints since this function has been relocated to the Technical Requirements Manual. In addition, deletes reference to APRM Flow Biased Neutron Flux Scram and RBM Trip Setpoints since the trip setpoints are an operational detail. | N/A | 3.6.A Action 1.c |
| A.5 | Deletes the requirement to restore the recirculation pump speeds to within the limits if they are not within the limits. ITS does not explicitly detail options to "restore...to within the specified limit" when an alternate ACTION is provided that allows continued operation. | 3.4.1 ACTION B | 3.6.C Action 1 |
| A.6 | Deletes CTS 3.6.C Action 2, referencing CTS 3.6.A.1, since the statement only serves as a cross reference. | N/A | 3.6.C Action 2 |
| | | | |
| 3.4.2, Jet Pumps | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.4.2 | 3/4.6.B |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM**

| | | | |
|--|--|---------------------------|----------------------------------|
| A.2 | Revises the wording in CTS 4.6.B.1 and CTS 4.6.B.2 (ITS SR 3.4.2.1) to require verification that one of the criteria be met, rather than require verification that no two of the conditions exist. | SR 3.4.2.1 | 4.6.B.1, 4.6.B.2 |
| | | | |
| 3.4.3, Safety and Relief Valves | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.4.3 | 3/4.6.E, 3/4.6.F |
| A.2 | Revises the organization of the Safety and Relief Valves requirements of CTS 3/4.6.E and CTS 3/4.6.F, respectively, to be included within one Specification in the ITS (ITS 3.4.3). | 3.4.3 | 3/4.6.E, 3/4.6.F |
| A.3 | (Unit 1) Deletes CTS 4.6.E.2 Note c providing a one time extension of the safety valve pressure testing surveillance interval from 18 months to 24 months for Cycle 16 only since the one time extension will have expired prior to ITS implementation and will no longer be applicable. | N/A | 4.6.E.2 Note c |
| A.4 | Adds SR 3.4.3.2 to ensure the relief valves open when manually actuated and SR 3.4.3.3 to ensure that the relief valves will actuate on an actual or simulated automatic initiation signal, which are consistent with current testing requirements in CTS 4.5.A.4.a and 4.5.A.4.b. | SR 3.4.3.2, SR 3.4.3.3 | N/A |
| | | | |
| 3.4.4, RCS Operational Leakage | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.4.4 | 3/4.6.H |
| A.2 | Editorially changes "any 24 hour period" to "the previous 24 hour period." | 3.4.4.c, 3.4.4.d | 3.6.H.2, 3.6.H.4, 3.6.H Action 3 |
| A.3 | Moves the CTS 4.6.H.1 requirement for sampling of primary containment particulate and the associated footnote <u>a</u> to ITS 3.4.5. | 3.4.5 | 4.6.H.1 |
| A.4 | Adds an option to reduce the leakage to within the limit in lieu of identifying the source as not IGSCC susceptible material, since restoring compliance with the LCO is always an option. | 3.4.4 Required Action B.1 | N/A |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM**

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|--|--|----------------|------------------|
| | | | |
| 3.4.5, RCS Leakage Detection Instrumentation | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.4.5 | 3/4.6.G, 4.6.H.1 |
| A.2 | Revises CTS 4.6.H.1 which requires sampling the primary containment atmosphere particulate radioactivity at least once every 12 hours to proposed SR 3.4.5.1 requiring a channel check. | SR 3.4.5.1 | 4.6.H.1 |
| A.3 | Deletes the CTS 3.6.G Action 2 requirement to establish an alternate method of determining drywell floor drain sump flow rates within 8 hours since CTS 4.6.H.2 (proposed ITS SR 3.4.4.1) already requires the determination of drywell floor drain sump flow rate at this specified frequency and 3.6.H (proposed ITS 3.4.5) provides the appropriate ACTIONS for conditions when LEAKAGE cannot be determined. In addition, proposed SR 3.4.4.1 Bases address acceptable methods to determine LEAKAGE. | N/A | 3.6.G Action 2 |
| A.4 | Adds an Action to explicitly identify that LCO 3.0.3 is required to be entered if all required RCS leakage detection systems are inoperable, which is consistent with the intent of the CTS. | 3.4.5 ACTION D | 3.6.G, 3.0.C |
| A.5 | Deletes the requirement in CTS 4.6.G.1 to perform the leakage determinations of CTS 4.6.H since it duplicates the requirement of CTS 4.6.H.2 (ITS SR 3.4.4.1). | N/A | 4.6.G.1 |
| | | | |
| 3.4.6, RCS Specific Activity | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.4.6 | 3/4.6.J |
| | | | |
| 3.4.7, RHR Shutdown Cooling System - Hot Shutdown | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.4.7 | 3/4.6.O |

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

| | | | |
|--|--|----------------------|----------------------------------|
| A.2 | Deletes the detail in CTS 3.6.O that an RHR shutdown cooling subsystem must be capable of circulating reactor coolant since it is duplicative to the requirements in CTS 3.6.O footnote (a) and the definition of OPERABLE-OPERABILITY. In addition, the contents of CTS 3.6.O footnote (a) and 4.6.O are incorporated into a Surveillance Requirement. | SR 3.4.7.1 | 3.6.O, 3.6.O footnote (a), 4.6.O |
| A.3 | Deletes allowance to remove the RHR shutdown cooling loop from operation during hydrostatic tests since these tests are not performed in MODE 3. | N/A | 3.6.O footnote (b) |
| A.4 | Adds ITS Note "Separate Condition entry is allowed for each RHR shutdown cooling subsystem," which is consistent with the intent of the CTS. | 3.4.7 ACTIONS Note 2 | 3.6.O Actions |
| A.5 | Deletes the requirement to demonstrate every 24 hours the OPERABILITY of at least one alternate method capable of decay heat removal for each inoperable RHR shutdown cooling loop. It is unnecessary since the Specification requires that reactor be in MODE 4 within 24 hours (which exits this Specification), and CTS 3.6.P and the ITS 3.4.8 both require the periodic verification of the availability of an alternate decay heat removal method. | N/A | 3.6.O Action 1 |
| A.6 | Deletes the requirement which allows the unit to maintain reactor coolant temperature as low as practical in lieu of attaining MODE 4, when two SDC subsystems are inoperable and the unit is unable to attain MODE 4. | N/A | 3.6.O Action 1 footnote (c) |
| | | | |
| 3.4.8, RHR Shutdown Cooling System - Cold Shutdown | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. (P) | 3.4.8 | 3/4.6.P |
| A.2 | Deletes the detail in CTS 3.6.O that an RHR shutdown cooling subsystem must be capable of circulating reactor coolant since it is duplicative to the requirements in CTS 3.6.P footnote (a) and the definition of OPERABLE-OPERABILITY. In addition, the contents of CTS 3.6.P footnote (a) and 4.6.P are incorporated into a Surveillance Requirement. | SR 3.4.8.1 | 3.6.P, 3.6.P footnote (a), 4.6.P |
| A.3 | Not used. | N/A | N/A |
| A.4 | Adds ITS Note "Separate Condition entry is allowed for each RHR shutdown cooling subsystem" which is consistent with the intent of the CTS. | 3.4.8 ACTIONS Note | 3.6.P Actions |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM**

| 3.4.9, RCS Pressure and Temperature (P/T) Limits | | | |
|--|---|--------------------------------|------------------------------|
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.4.9 | 3/4.6.D, 3/4.6.K |
| A.2 | Clarifies Actions to "perform an engineering evaluation..." and "determine if the Reactor Coolant System is acceptable for continued operation" with Notes that state the determination that the acceptability of the RCS for continued operation must be completed any time the requirements of the LCO are not met. | 3.4.9 Conditions A and C Notes | 3.6.K Action 2, 3.6.D Action |
| A.3 | Changes the CTS Action to "restore...within 30 minutes" to "initiate action to restore ...Immediately" for conditions other than MODES 1, 2, and 3, which is consistent with the intent of the CTS. | 3.4.9 Required Action C.1 | 3.6.K Action 1, 3.6.D Action |
| A.4 | Deletes the reactor vessel material specimen Surveillance since it is a duplication of the regulations found in 10 CFR 50 Appendix H. | N/A | 4.6.K.3 |
| A.5 | Adds Notes to clarify the current intent in CTS 4.6.K.4.a (periodic verification that reactor vessel flange and head flange temperatures are within limits) of allowing entry into the applicable conditions (i.e., $\leq 113^{\circ}\text{F}$ and $\leq 93^{\circ}\text{F}$) without having performed these SRs. | SR 3.4.9.6, SR 3.4.9.7 | N/A |
| A.6 | Deletes the requirement to verify the reactor vessel and head flange temperatures within 30 minutes prior to tensioning of the head bolting studs, since it is duplicative of ITS SR 3.0.1. | N/A | 4.6.K.4.b |
| A.7 | The idle recirculation loop startup requirements have been combined into the RCS Pressure and Temperature Limits Specification, with the words "and the recirculation pump starting temperature requirements" added to the ITS 3.4.9 LCO statement. The actual description of the requirements and the limits are found in the Surveillance Requirements. | 3.4.9 LCO | 3.6.D |
| A.8 | Deletes the requirement to monitor the temperature difference between an idle loop and an operating loop, since they are redundant to the loop-to-coolant requirement of CTS 3.6.D.1 (ITS SR 3.4.9.4). | N/A | 3.6.D.2 |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM**

| | | | |
|---|---|--------|----------------|
| A.9 | Deletes the CTS 3.6.K Action 1 detail that the applicable primary system coolant temperature rate of change limit cannot be exceeded while restoring the reactor vessel metal temperature and/or pressure to within the limits. CTS LCO 3.0.A (ITS LCO 3.0.1) requires compliance with the Limiting Conditions for Operation during the Operational Modes or other conditions specified. <i>specified</i> | N/A | 3.6.K Action 1 |
| | | | |
| 3.4.10, Reactor Steam Dome Pressure | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.4.10 | 3/4.6.L |
| | | | |
| Current Specification 3/4.6.N, Structural Integrity | | | |
| NONE | NONE | NONE | NONE |
| | | | |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|------------------------------|--|---|--|
| 3.5.1, ECCS-Operating | | | |
| A.1 | Editorial changes, reformatting, and revised renumbering. | 3.5.1 | 3/4.5.A |
| A.2 | Deletes footnote (f), which provides a cross reference to CTS 3.9.A, since ITS 3.8.1 Required Action B.2 adequately prescribes the necessary actions when redundant required feature(s) are inoperable. | N/A | 3.5.A Actions 2.a and 2.b footnote (f) |
| A.3 | Revises CTS 4.5.A.2.c and 4.5.A.3.b.1) footnote (c) to allow the HPCI flow tests to be performed within 12 hours after adequate reactor steam pressure is available. In addition, CTS 4.5.A.4.b footnote (c) allows the ADS valve actuation test to be deferred until 12 hours after adequate reactor steam pressure is available. Adequate pressure to perform the tests also implies adequate flow must be available to perform the tests. | Note to SR 3.5.1.6, SR 3.5.1.7, and SR 3.5.1.10 | 4.5.A.2.c, 4.5.A.3.b.1) footnote (c), 4.5.A.4.b footnote (c) |
| A.4 | Deletes CTS 3.5.A Actions 2.b and 2.c, footnote (d), which the unit is to maintain reactor coolant temperature as low as practical, in lieu of attaining MODE 4, when two or more RHR subsystems are inoperable and the unit is unable to attain MODE 4, since it provides unnecessary duplication of the ACTIONS required by ITS 3.4.7 and 3.4.8. | N/A | 3.5.A Actions 2.b and 2.c footnote (d) |
| A.5 | Deletes the statements in CTS 3.5.A Actions 1, 2, 3 and 4 that require other ECCS equipment to be OPERABLE ("provided that.."). ITS 3.5.1 ACTION J provides direction for various interrelationships between ECCS subsystems and ADS. The ACTION requires entry into LCO 3.0.3 for various combinations of inoperable components, which is consistent with the present Actions for the same combinations. | 3.5.1 ACTION J | 3.5.A Actions 1, 2, 3 and 4 |
| | | | |
| 3.5.2, ECCS-Shutdown | | | |
| A.1 | Editorial changes, reformatting, and revised renumbering. | 3.5.2 | 3/4.5.B, 3/4.5.C |
| A.2 | Rewords SRs such that the applicable SRs for low pressure ECCS and for HPCI are presented in the SRs for this Specification, versus referring to the SRs in ITS 3.5.1. | SR 3.5.2.2, SR 3.5.2.3, SR 3.5.2.4 | 4.5.B |

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM

Insert A.3

3.5.2
ACTION D

3.5.B Action 2,
3.5.C Action 2

NRC
See
Comment
1

| | | | |
|--------------------|--|---------------------------|---|
| A.3 | Not used. | N/A | N/A |
| A.4 | Replaces the use of the defined term SECONDARY CONTAINMENT INTEGRITY with the essential elements of that definition. | 3.5.2 ACTION D | 3.5.B Action 2, 3.5.C Action 2 |
| A.5 | Removes statement that the ECCS is not required to be OPERABLE provided "that the reactor vessel head is removed, the cavity is flooded," since the other requirements of the note can only be accomplished if the vessel head is removed and the cavity flooded. | N/A | 3.5.B footnote (b), 3.5.C footnote (a) |
| A.6 | Moves CTS 3.5.C.1 and associated Applicability, Action 1, and CTS 4.5.C.1 to ITS 3.6.2.2. | 3.6.2.2 | 3.5.C.1, 3.5.C Action 1, 4.5.C.1 |
| A.7 | As an enhanced presentation of current intent, deletes CTS 4.5.C.2.b, which requires periodic verification that the specified conditions of Applicability footnote (a) are met when the suppression pool is inoperable. | N/A | 4.5.C.2.b |
| 3.5.3, RCIC System | | | |
| A.1 | Editorial changes, reformatting, and revised renumbering. | 3.5.3 | 3/4.5.D |
| A.2 | Allows deferral of the RCIC flow tests until 12 hours after adequate steam pressure and flow are available. Footnote currently allows deferral until adequate steam pressure is available. Adequate pressure to perform the tests also implies adequate flow must be available to perform the tests. | SR 3.5.3.3, SR 3.5.3.4 | 4.5.D.2 footnote (a), 4.5.D.3.b footnote (a) |
| | | | |

INSERT A.3

Enhances presentation by requiring actions to be immediately initiated to restore secondary containment boundary (completing the actions as soon as possible) in lieu of current requirement to establish within 8 hours (initiating the actions as soon as possible).

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|--|---|---|--|
| 3.6.1.1, Primary Containment | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.6.1.1 | 3/4.7.A, 3.7.K.3, 4.7.K.5 |
| A.2 | Replaces the definition of PRIMARY CONTAINMENT INTEGRITY and the references to it in CTS 3/4.7.A with the requirement for primary containment to be OPERABLE, since all the requirements are specifically addressed in ITS 3.6.1.1 for the primary containment along with the remainder of the LCOs in the Primary Containment Section. | 3.6.1.1, 3.6.1.2, 3.6.1.3, 3.6.2.1, 3.6.2.2 | 3/4.7.A |
| A.3 | Deletes the cross reference to CTS 3.12.A, since the format of the ITS does not include providing "cross references." | N/A | 3.7.A Applicability footnote (a) |
| A.4 | CTS 4.7.A.2 (including footnote (b)), relating to the position verification of PCIVs, has been moved to ITS 3.6.1.3. | 3.6.1.3 | 4.7.A.2 including footnote (b) |
| A.5 | Deletes Surveillance Requirements 4.7.A.3 and 4.7.A.4, which cross reference to the requirements for the air lock and the suppression chamber. Requirements for the air lock and suppression chamber remain within the ITS; however, providing a cross reference to them only adds confusion when evaluating compliance with Primary Containment OPERABILITY. | N/A | 4.7.A.3, 4.7.A.4 |
| A.6 | The drywell-to-suppression chamber bypass leakage requirement of CTS 3.7.k.3 is presented as a supporting Surveillance for Primary Containment OPERABILITY. | SR 3.6.1.1.2 | 3.7.K.3 |
| | | | |
| 3.6.1.2, Primary Containment Air Lock | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.6.1.2 | 3/4.7.C |
| A.2 | Deletes the cross reference to CTS 3.12.A, since the format of the ITS does not include providing "cross references." | N/A | 3.7.C Applicability footnote (a) |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS**

| | | | |
|--|---|---|---|
| A.3 | A Note is proposed to be added to the ITS to facilitate use and understanding of the intent of the ITS and are consistent with the intent of the CTS. ITS 3.6.1.2 ACTIONS Note 2 requires considering the primary containment inoperable in the event air lock leakage results in the acceptance criteria being not met. In addition, ITS 3.6.1.2 Required Action C.1 will ensure that the primary containment overall leakage is evaluated, against the acceptance criteria, if an air lock is inoperable. | 3.6.1.2 ACTIONS Note 2, 3.6.1.2 Required Action C.1 | 3.7.C Actions |
| A.4 | Adds ITS Required Action Note "Required Actions...are not applicable if...Condition C is entered", recognizing that if both doors in the air lock are inoperable, then an "OPERABLE" door does not exist to be closed (ITS 3.6.1.2 Required Actions A.1, A.2, A.3, B.1, B.2, and B.3 cannot be met). | 3.6.1.2 Required Actions A and B Note 1 | 3.7.C Actions |
| A.5 | The revised presentation of CTS 3.7.C Actions 1.a and 2 do not explicitly detail options to "restore...to OPERABLE status," since this action is always an option, and is implied in all Actions. | LCO 3.0.2 | 3.7.C Actions 1.a and 2 |
| A.6 | The requirement for performing the overall air lock leakage test is a requirement of 10 CFR 50 Appendix J, and this requirement is embodied in ITS SR 3.6.1.2.1. It is possible that the test would not be able to be performed with an inoperable air lock door, and a plant shutdown would be required due to the inability to perform the required Surveillance. However, this restriction on continued operation need not be specified (i.e., CTS 3.7.C Action 1.b is deleted) since it exists inherently as a result of the required Appendix J testing. | SR 3.6.1.2.1 | 3.7.C Action 1.b |
| 3.6.1.3, Primary Containment Isolation Valves | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.6.1.3 | 3/4.7.A, 3/4.7.D, 3/4.6.M, 4.7.A.2 including footnote (b) |

MRC
← *Covered by 4.2.A.2*

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS**

| | | | |
|-----|---|--|--|
| A.2 | Includes requirements for MSIVs in ITS 3.6.1.3, however, does not include requirements for the reactor building - suppression chamber vacuum breakers; they are retained in ITS 3.6.1.7. Therefore, the ITS LCO 3.6.1.3 statement excludes the OPERABILITY of the reactor building - suppression chamber vacuum breakers. In addition, since all requirements of MSIVs are included in ITS 3.6.1.3, the cross reference in CTS 3.7.D Action 1 footnote (b) to MSIVs is excluded. | LCO 3.6.1.3 | 3.7.D Action 1 footnote (b) |
| A.3 | Adds ITS ACTIONS Note "Separate Condition entry is allowed for each penetration flow path," which is consistent with the intent of the CTS. | 3.6.1.3 ACTIONS Note 2 | 3.4.7.A, 3.7.D Actions, 3.6.M Actions |
| A.4 | Adds ITS ACTIONS Notes to facilitate the use and understanding of the intent for a system made inoperable by inoperable PCIVs; i.e., that the applicable ACTIONS for that system also apply. This requirement is currently located in CTS 3.7.D Action 2.b, but it does not cover all situations. Therefore, ITS 3.6.1.3 ACTIONS Note 3 has been added to cover all situations. ITS 3.6.1.3 ACTIONS Note 4 clarifies that these "systems" include the primary containment. | 3.6.1.3 ACTIONS Notes 3 and 4 | 3.7.D Action 2.b |
| A.5 | CTS 3.7.D Action 1 and the CTS 3.6.M Action do not specify penetrations with one or two isolation valves. However, ITS 3.6.1.3 Condition A applies if the affected penetration has two valves, and only one is inoperable. This inherently ensures maintaining "at least one isolation valve OPERABLE." In the case of containment penetrations designed with only one isolation valve, the system boundary is considered an adequate barrier and the penetration is not considered "open" when the single isolation valve is open. | 3.6.1.3 Condition A Condition C | 3.4.7.A, 3.7.D Action 1, 3.6.M Action |
| A.6 | The revised presentation of CTS 3.7.D Actions 1.a and 2.a and the CTS 3.6.M Action does not explicitly detail options to "restore...to OPERABLE status," since this action is always an option, and is implied in all Actions. | LCO 3.0.2 | 3.7.D Actions 1.a and 2.a, 3.6.M Action |
| A.7 | Deletes the phrase "power-operated" from the first part of 4.7.D.2, since the last part of 4.7.D.2 only requires each automatic isolation valve to be verified that it actuates to its isolation position. In addition, deletes the 4.7.D.2 testing requirement exclusion for the traversing in-core probe system explosive isolation valves, since they are not closed on an automatic signal. | N/A | 4.7.D.2 |

NRC
Not in Dec A.3

NRC
Not in Dec A.5

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

| | | | |
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| A.8 | Deletes the LCO 3.0.C statement in CTS 3.7.D Action 2 since it is redundant to the "Otherwise..." action. That is, LCO 3.0.C is not applicable anyway since a shutdown action has been provided. | N/A | 3.7.D Action 2 |
| A.9 | Incorporate the requirements, provisions, actions, and associated restoration times for MSIVs into ITS 3.6.1.3, the primary containment isolation valve Specification. | 3.6.1.3 | 3/4.6.M |
| 3.6.1.4, Drywell Pressure | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.6.1.4 | 3/4.7.G |
| A.2 | The requirement in CTS 3.7.G footnote (a), concerning the minimum drywell internal pressure (≥ 1.0 psig) has been deleted, since the requirement in CTS 3.7.H (ITS 3.6.2.5) to maintain differential pressure between the drywell and the suppression chamber ≥ 1.0 psid is sufficient to minimize the hydrodynamic loads on the torus during the blowdown. | N/A | LCO 3.7.G footnote (a) 3.7.G Action 1 |
| 3.6.1.5, Drywell Air Temperature | | | |
| NONE | NONE | NONE | NONE |
| 3.6.1.6, Low Set Relief Valves | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.6.1.6 | 3/4.6.F |
| A.2 | CTS 3.6.F includes the OPERABILITY requirements for the relief valves, including the low set relief valve group. In ITS LCO 3.6.1.6, only the two low set relief valves are required to be OPERABLE; the relief valves are covered by ITS 3.4.3. | 3.6.1.6 | 3/4.6.F |

Also, CTS 3.7.G Action 1, which provides the actions when the pressure limit required by the footnote is not met, has been deleted.

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS**

| | | | |
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| A.3 Open BSI | Adds two Surveillance Requirements. ITS SR 3.6.1.6.1 ensures the low set relief valves open when manually actuated, which ensures that the valves and solenoids are functioning properly and that no blockage exists in the lines. ITS SR 3.6.1.6.2 ensures that the low set relief valves will actuate automatically on receipt of specific initiation signals by performance of a system functional test. These new Surveillance Requirements are consistent with current testing requirements in CTS 4.5.A.4.a and b (for ADS) except as modified in the DOCs for ITS 3.5.1, "ECCS — Operating." | SR 3.6.1.6.1, SR 3.6.1.6.2 | 4.5.A.4.a, 4.5.A.4.b |
| | | | |
| 3.6.1.7, Reactor Building-to-Suppression Chamber Vacuum Breakers | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.6.1.7 | 3/4.7.F |
| A.2 | Not used. | <i>N/A</i> | <i>N/A</i> |
| A.3 | Note 2 to SR 3.6.1.7.1 has been added to clearly state that the vacuum breakers do not have to be closed when they are performing their intended function, which is to open to relieve vacuum. | SR 3.6.1.7.1 Note 2 | 4.7.F.1 |
| | | | |
| 3.6.1.8, Suppression Chamber-to-Drywell Vacuum Breakers | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.6.1.8 | 3/4.7.E |
| A.2 | Note 2 to SR 3.6.1.8.1 has been added to clearly state that the vacuum breakers do not have to be closed when they are performing their intended function, which is to open to relieve vacuum. | SR 3.6.1.8.1 Note 2 | 4.7.E.1 |
| | | | |
| 3.6.2.1, Suppression Pool Average Temperature | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.6.2.1 | 3/4.7.K |

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

| | | | |
|---------------------------------------|--|--------------------------------|---|
| A.2 | CTS 3.7.K.2 appears to require the 95°F and 105°F limits to apply at all times in Operational Mode 1 or 2. However, this limit actually only applies when THERMAL POWER is > 1% RTP. This is shown by CTS 3.7.K.2.b, which states that 110°F is the limit when ≤ 1% RTP. Therefore, the ITS LCO for this limit has been clarified to be at > 1% RTP. Once THERMAL POWER is ≤ 1% RTP, the LCO is met if suppression pool temperature is ≤ 110°F, thus, a shutdown to MODE 3 and MODE 4 is not required, as stated in CTS 3.0.B. | LCO 3.6.2.1.a LCO 3.6.2.1.b | 3.7.K.2, 3.7.K.2.b |
| A.3 | Moves the requirements in CTS 3.7.K.3 and 4.7.K.5, relating to the drywell-to-suppression chamber bypass leakage limit, to ITS 3.6.1.1. | 3.6.1.1 | 3.7.K.3, 4.7.K.5 |
| 3.6.2.2, Suppression Pool Water Level | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.6.2.2 | 3/4.7.K, 3/4.5.C |
| A.2 | Not used. | N/A | N/A |
| A.3 | Moves the requirements in CTS 3.5.C.2, 3.5.C Action 2, and 4.5.C.2, and footnote (a), relating to the suppression pool level requirements while in MODES 4 and 5, to ITS 3.5.2. | 3.5.2 | LCO 3.5.C.2, 3.5.C Action 2, 4.5.C.2, and footnote (a) |
| 3.6.2.3, RHR Suppression Pool Cooling | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.6.2.3 | 3/4.7.M |
| A.2 | Not used. | | |

Insert A.2

3.6.2.3
ACTION C

3.7.M Action 2
Footnote (a)

NRC
See
Comment
4

INSERT A.2

Deletes CTS 3.7.M Action 2, footnote (a), which allows the unit to maintain reactor coolant temperature as low as practical, in lieu of attaining MODE 4, when two or more RHR SDC mode subsystems are inoperable and the unit is unable to attain MODE 4, since it provides unnecessary duplication of the ACTIONS required by ITS 3.4.8.

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS**

| | | | |
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| A.3 | The CTS requires verification that each suppression pool cooling valve in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position. The CTS recognizes that the suppression pool cooling function is manually actuated and is interpreted that "in the correct position" allows the valves to be in a non-accident position provided they can be realigned to the correct position. In the ITS, the words "in the correct position" mean that the valves must be in the accident position, unless they can be automatically aligned on an accident signal. Thus, for RHR suppression pool cooling, the additional words "or can be aligned to the correct position" have been added to clarify that it is permissible for this systems' valves to be in the non-accident position and still be considered OPERABLE. In addition, since there are no automatic valves for the suppression pool cooling mode, the reference to check automatic valves has been deleted. | SR 3.6.2.3.1 | 4.7.M.1 |
| <div style="text-align: right;">3.7.L Action 2, footnote (a)</div> | | | |
| <div style="text-align: center;">Insert A.2</div> <div style="text-align: center;">3.6.2.4, RHR Suppression Pool Spray</div> | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.6.2.4 | 3/4.7.L |
| A.2 | Not used. | <div style="text-align: center;">3.6.2.4 ACTION</div> | |
| A.3 | The CTS requires verification that each suppression pool spray valve in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position. The CTS recognizes that the suppression pool spray function is manually actuated and is interpreted that "in the correct position" allows the valves to be in a non-accident position provided they can be realigned to the correct position. In the ITS, the words "in the correct position" mean that the valves must be in the accident position, unless they can be automatically aligned on an accident signal. Thus, for RHR suppression pool spray, the additional words "or can be aligned to the correct position" have been added to clarify that it is permissible for this systems' valves to be in the non-accident position and still be considered OPERABLE. In addition, since there are no automatic valves for the suppression pool spray mode, the reference to check automatic valves has been deleted. | SR 3.6.2.4.1 | 4.7.L.1 |
| 3.6.2.5, Drywell-to-Suppression Chamber Differential Pressure | | | |

See Comment 4

INSERT L.2

In reference to the CTS action to immediately maintain an air lock door closed, changes the word "maintain" to "verify" and 1 hour is allowed to complete the verification in the ITS.

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS**

| | | | |
|--|--|------------------------------|-----------------------------|
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.6.2.5 | 3/4.7.H |
| A.2 | Revises the presentation of the ACTIONS to be consistent with the Applicability. The ITS only requires shutdown to 15% RTP. Below 15% RTP, the Applicability is exited and the ACTIONS are no longer required. | 3.6.2.5 ACTION B | 3.7.H Action 1 |
| | | | |
| 3.6.3.1, Primary Containment Oxygen Concentration | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.6.3.1 | 4.0.D 3/4.7.J |
| A.2 | Revises the presentation of the ACTIONS to be consistent with the Applicability. The ITS only requires shutdown to 15% RTP. Below 15% RTP, the Applicability is exited and the ACTIONS are no longer required. | 3.6.3.1 ACTION B | 3.7.J Action |
| A.3 | Deletes CTS 4.7.J, which requires oxygen concentration in primary containment to be verified within limit prior to entering the Applicability of CTS 3.7.J (within 24 hours after THERMAL POWER is greater than 15% of RTP). This requirement does not need to be repeated as a separate Surveillance Frequency. | SR 3.0.4 | 4.7.J |
| | | | |
| 3.6.4.1, Secondary Containment | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.6.4.1 | 3/4.7.N |
| A.2 | Replaces the definition of SECONDARY CONTAINMENT INTEGRITY and the references to it in CTS 3/4.7.N with the requirement for secondary containment to be OPERABLE, since all the requirements are specifically addressed in the ITS and associated Bases for the Secondary Containment (3.6.4.1), the Secondary Containment Isolation Valves (3.6.4.2), and Standby Gas Treatment System (3.6.4.3). | 3.6.4.1, 3.6.4.2, 3.6.4.3 | 3/4.7.N |

NAC
Not in this section →

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

| | | | |
|---|---|-------------------------------------|--------------------|
| A.3 | Modifies the requirement to verify that one door in each access is closed to require one door in each access opening to be closed. The Quad Cities 1 and 2 design includes more than two doors on some of the accesses, and the current Quad Cities 1 and 2 interpretation of this requirement is that for these accesses, there are multiple access openings, and that each access opening must have at least one door closed. | SR 3.6.4.1.2 | 4.7.N.2.a |
| A.4 | Moves the requirements in CTS 4.7.N.2.b, relating to the position of secondary containment isolation valves, to ITS 3.6.4.2. | 3.6.4.2 | 4.7.N.2.b |
| 3.6.4.2, Secondary Containment Isolation Valves | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.6.4.2 | 3/4.7.N 3/4.7.O |
| A.2 | The name and descriptive references to the secondary containment isolation dampers contained in CTS 3.7.O, 4.7.N, and 4.7.O have been generically changed to Secondary Containment Isolation Valves (SCIVs). | 3.6.4.2 | 3/4.7.O, 4.7.N |
| A.3 | Adds ITS ACTIONS Note "Separate Condition entry is allowed for each penetration flow path." Additionally, adds ITS ACTIONS Note that facilitates the use and understanding of the intent to consider the affect of inoperable isolation valves on other systems. For a system made inoperable by inoperable SCIVs the applicable ACTIONS for that system also apply. This is consistent with the intent of the CTS. | 3.6.4.2 ACTIONS Notes 2 and 3 | 3.7.O Action |
| A.4 | The CTS 3.7.O Action does not specify penetrations with one or two isolation valves. However, ITS 3.6.4.2 Condition A only applies if one valve in a penetration is inoperable. This inherently ensures maintaining "at least one isolation valve OPERABLE." | 3.6.4.2 Condition A | 3.7.O Action |
| A.5 | The revised presentation of the CTS 3.7.O Action does not explicitly detail options to "restore...to OPERABLE status," since this action is always an option, and is implied in all Actions. | LCO 3.0.2 | 3.7.O Action |
| 3.6.4.3, Standby Gas Treatment System | | | |

4.7.N.2.b
NRC
This is more accurate

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS**

| | | | |
|------------|---|---|---|
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.6.4.3 | 3/4.7.P |
| A.2 | Moves the filter testing requirements of CTS 4.7.P.2, 4.7.P.3, 4.7.P.4.a, 4.7.P.4.c, 4.7.P.5 and 4.7.P.6, to ITS 5.5.7. A Surveillance Requirement is added (proposed SR 3.6.4.3.2) to clarify that the tests of the Ventilation Filter Testing Program must also be completed and passed for determining OPERABILITY of the SGT System, which is consistent with the intent of the CTS. | SR 3.6.4.3.2, 5.5.7 | 4.7.P.2, 4.7.P.3, 4.7.P.4.a, 4.7.P.4.c, 4.7.P.5, 4.7.P.6 |
| A.3 | Divides CTS 4.7.P.4.b, which verifies each SGT subsystem starts on the appropriate automatic initiation signals, into two Surveillances. The majority of the instrumentation testing will be performed in SR 3.3.6.2.3, SR 3.3.6.2.4, and SR 3.3.6.2.5, and the actual system functional test portion, which will ensure the SGT System starts on an initiation signal, will be performed as SR 3.6.4.3.3. | SR 3.3.6.2.3, SR 3.3.6.2.4, SR 3.3.6.2.5, SR 3.6.4.3.3 | 4.7.P.4.b |
| | | | |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|--|--|------------------------------------|----------------------------------|
| 3.7.1, Residual Heat Removal Service Water System | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.7.1 | 3/4.8.A |
| A.2 | Adds "or can be aligned to the correct position" in SR 3.7.1.1 to clarify that it is permissible for the RHRSW Systems' valves to be in the non-accident position and still be considered OPERABLE. | SR 3.7.1.1 | 4.8.A |
| A.3 | Deletes the redundant requirement which allows the unit to maintain reactor coolant temperature as low as practical in lieu of attaining MODE 4, when two or more RHR subsystems are inoperable and the unit is unable to attain MODE 4. | 3.7.1 Actions B, D and E N/A | 3.8.A Action 1.d footnote (a) |
| | | | |
| 3.7.2, Diesel Generator Cooling Water System | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.7.2 | 3/4.8.B |
| A.2 | Adds ITS Note, "Separate Condition entry is allowed for each DGCW subsystem," which is consistent with the intent of the CTS. | 3.7.2 ACTIONS Note | 3.8.B Actions Note |
| A.3 | Deletes CTS 3.8.B Action statement referencing CTS 3.9.A or 3.9.B, since the statement only serves as a cross reference. | N/A | 3.8.B Action |
| A.4 | The CTS requires a verification that each valve in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position. Since all the valves in the flow path are manual valves the word "manual" has been added. | SR 3.7.2.1 | 4.8.B.1 |
| | | | |
| 3.7.3, Ultimate Heat Sink | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.7.3 | 3/4.8.C |
| | | | |
| 3.7.4, Control Room Emergency Ventilation System | | | |

not in
ITS

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS**

| | | | |
|--|---|---|---|
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.7.4 | 3/4.8.D |
| A.2 | Moves the filter testing requirements of CTS 4.8.D.3, 4.8.D.4, 4.8.D.5.a, 4.8.D.5.d, 4.8.D.6, and 4.8.D.7, to ITS 5.5.7. Adds a Surveillance Requirement (proposed SR 3.7.4.2) to clarify that the tests of the Ventilation Filter Testing Program must also be completed and passed for determining OPERABILITY of the CREV System, which is consistent with the intent of the CTS. | SR 3.7.4.2, 5.5.7 | 4.8.D.3, 4.8.D.4, 4.8.D.5.a, 4.8.D.5.d, 4.8.D.6, and 4.8.D.7 |
| | | | |
| 3.7.5, Control Room Emergency Ventilation Air Conditioning System | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.7.5 | 3/4.8.D |
| A.2 | In the ITS, the Control Room Emergency Ventilation and Control Room Emergency Ventilation Air Conditioning Specification has been split into separate Technical Specifications; ITS 3.7.4 for the Control Room Emergency Ventilation (CREV) System and ITS 3.7.5 for the Control Room Emergency Ventilation AC System. Therefore, in ITS 3.7.5, the LCO, Actions, and Surveillance Requirements all refer to the Control Room Emergency Ventilation AC System. | 3.7.5 | 3/4.8.D |
| | | | |
| 3.7.6, Main Condenser Offgas | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.7.6 | 3/4.8.I |
| A.2 | Converts the units from $\mu\text{Ci/sec/MWt}$ to $\mu\text{Ci/sec}$, by multiplying CTS limit by the Rated Thermal Power licensing basis. | LCO 3.7.6 | 3.8.I |
| A.3 | Clarifies the Applicability by adding the condition of when any main steam line is not isolated, since a main condenser air ejector cannot be placed in service without main steam pressure (i.e., any main steam line not isolated). The ITS Applicability is also consistent with the CTS 3.8.I Action to be in at least STARTUP with the main steam isolation valves closed. In addition, a Required Action is added that requires the isolation of the air ejector within 12 hours to be consistent with the CTS Applicability. | 3.7.6 Applicability, 3.7.6 Required Action B.2 | 3.8.I Applicability footnote (a) |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS**

| | | | |
|--|---|---------------------------|----------------|
| | | | |
| 3.7.7, Main Turbine Bypass System | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| 3.7.8, Spent Fuel Storage Pool Water Level | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.7.8 | 3/4.10.H |
| A.2 | Clarifies that the Applicability is limited to circumstances when irradiated fuel assemblies are being moved in the spent fuel storage pool or when new fuel is being moved in the spent fuel storage pool with irradiated fuel assemblies in the spent fuel storage pool. This is acceptable since the purpose of the LCO is to ensure sufficient water is above the irradiated fuel assemblies to meet the assumptions of a fuel handling accident. | LCO 3.7.8 | LCO 3.10.H |
| | | | |
| 3.7.9, Safe Shutdown Makeup Pump System | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.7.9 | 3/4.8.J |
| A.2 | Modifies the CTS requirement to be in COLD SHUTDOWN to only require a reduction in reactor steam dome pressure to ≤ 150 psig in the ITS, since this ITS Required Action places the unit outside the Applicability of the Specification. | 3.7.9 Required Action B.2 | 3.8.J Action 1 |
| | | | |
| Current Specification 3/4.8.E, Flood Protection | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| Current Specification 3/4.8.F, Snubbers | | | |
| NONE | NONE | NONE | NONE |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS**

| | | | |
|---|-------------|-------------|-------------|
| | | | |
| Current Specification 3/4.8.G, Sealed Source Contamination | | | |
| NONE | NONE | NONE | NONE |
| | | | |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.8 - ELECTRIC POWER SYSTEMS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|--------------------------------------|--|--|---|
| 3.8.1, AC Sources - Operating | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.8.1 | 3/4.9.A |
| A.2 | Moves the details in CTS LCO 3.9.A.2.a relating to the required fuel oil day tank level and in CTS 3.9.A.2.b relating to the bulk fuel oil storage tank level to ITS SR 3.8.1.4. | SR 3.8.1.4 | LCO 3.9.A.2.a, LCO 3.9.A.2.b |
| A.3 | Clarifies that a modified DG start involving idling and gradual acceleration to synchronous speed as recommended by the manufacturer may be used, but when modified start procedures are not used, the time, voltage, and frequency tolerance of SR 3.8.1.8 must be met. | SR 3.8.1.2 Note 2 | 4.9.A.2.c |
| A.4 | CTS 4.9.A.2.c, 4.9.A.2.d, 4.9.A.7, 4.9.A.8.b, 4.9.A.8.c, and 4.9.A.8.h specify requirements for testing of a DG (1/2 diesel generator) that is common to both units. Therefore, a Note is added to the applicable ITS SRs to clearly state the current plant interpretation, i.e., a single test of the common DG at the specified Frequency will satisfy the Surveillance for both units. | SR 3.8.1.2 Note 3, SR 3.8.1.3 Note 5, SR 3.8.1.8 Note 2, SR 3.8.1.10 Note, SR 3.8.1.11 Note 1, SR 3.8.1.15 Note 3, SR 3.8.1.16 Note 3 | 4.9.A.2.c, 4.9.A.2.d, 4.9.A.7, 4.9.A.8.b, 4.9.A.8.c, 4.9.A.8.h |
| A.5 | Deletes CTS 4.9.A.2.c and 4.9.A.7 footnote (c), which states that CTS 4.9.A.7 (the DG start with a 10 second time requirement) may be substituted for CTS 4.9.A.2.c (the slow start), since it is not necessary. | N/A | 4.9.A.2.c and 4.9.A.7 footnote (c) |
| A.6 | Moves the technical content of the fuel oil storage and starting air requirements in CTS 3.9.A Action 7, 4.9.A.2.f, 4.9.A.5, 4.9.A.6, and 4.9.A.10 to ITS 3.8.3. | 3.8.3 | 3.9.A Action 7, 4.9.A.2.f, 4.9.A.5, 4.9.A.6, 4.9.A.10 |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.8 - ELECTRIC POWER SYSTEMS**

| | | | |
|------|---|---------------------|--|
| A.7 | In the event AC Sources are inoperable such that a distribution subsystem were inoperable, ITS LCO 3.0.6 would allow taking only the AC Sources ACTIONS; taking exception to complying with the AC Distribution System ACTIONS. Since the AC Sources ACTIONS may not be sufficiently conservative in this event (an entire division may be without power), specific direction to take appropriate ACTIONS for the Distribution System is added when there is no power for a division. | 3.8.1 ACTION D Note | 3.9.A Actions |
| A.8 | Deletes CTS 3.9.A Actions 3.b and 6.b footnote (e) detail that a successful test of OPERABILITY per CTS 4.9.A.2.c under this ACTION statement satisfies the diesel generator test requirements of ACTION(s) 1 (one offsite circuit inoperable) or 2 (one DG inoperable), since it is unnecessary. In addition, the reference to Action 1 is incorrect since there are no diesel generator testing requirements with an offsite circuit inoperable. | N/A | 3.9.A Actions 3.a and 6.b, footnote (e) |
| A.9 | CTS 4.9.A.7 and 4.9.A.9, footnote (a) and CTS 4.9.A.8.c and 4.9.A.8.h, footnote (d), which allow DG engine pre-lubrication when starting diesel generators, references CTS Surveillance Requirements that define requirements for operating DGs. Therefore, the footnotes have been deleted from these Surveillance Requirements. | N/A | 4.9.A.7 and 4.9.A.9 footnote (a), 4.9.A.8.c and 4.9.A.8.h footnote (d) |
| A.10 | CTS 4.9.A.8.c footnote (d) allows momentary transients outside of the load range during the full load reject test. This Note is not needed since the requirement specifies a load range which must be rejected and does not specify any explicit transient requirements for load. | N/A | 4.9.A.8.c footnote (d) |
| A.11 | The requirement in CTS 4.9.A.8.d.2) to verify the energization of the auto-connected shutdown loads during the loss of offsite power test has been deleted, since the Quad Cities 1 and 2 design does not include any auto-connected shutdown loads on a loss of offsite power by itself. | N/A | 4.9.A.8.d.2) |
| A.12 | With three or more required AC sources inoperable (e.g., two offsite circuits and one DG), ACTIONS would be taken in accordance with ITS 3.8.1, and ITS LCO 3.0.3 entry conditions would not be met. Since CTS 3.9.A does not provide Actions for these conditions, ITS 3.8.1 ACTION G is added to direct entry into ITS LCO 3.0.3, to preserve the existing intent for CTS 3.0.C entry. | 3.8.1 ACTION G | 3.9.A Actions |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.8 - ELECTRIC POWER SYSTEMS**

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|--|--|------------------------|--|
| A.13 | The requirement of CTS 4.9.A.8.f.2 that auto-connected loads be energized "through the load sequencer" is changed to "including through time delays, where applicable." The design does not include a load sequencer, but includes "timedelay relays" for some individual components. | SR 3.8.1.19 | 4.9.A.8.f.2 |
| | 11" 9" space | | |
| 3.8.2, AC Sources - Shutdown | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.8.2 | 3/4.9.B |
| A.2 | Moves the details in CTS LCO 3.9.B.2.a relating to the required day tank level and in CTS 3.9.B.2.b relating to the bulk fuel storage tank level to ITS SR 3.8.2.1. | SR 3.8.2.1 | LCO 3.9.B.2.a, LCO 3.9.B.2.b |
| A.3 | In the event AC Sources are inoperable such that a distribution subsystem were inoperable, ITS LCO 3.0.6 would allow taking only the AC Sources ACTIONS; taking exception to complying with the AC Distribution System ACTIONS. Since the AC Sources ACTIONS may not be sufficiently conservative in this event (e.g., RHR-SDC could be inoperable), specific direction to take appropriate ACTIONS for the Distribution System is added when there is no power for a required division. | 3.8.2 ACTION A Note | 3.9.B Actions |
| A.4 | For clarity, adds an exception to CTS 4.9.A.9 (ITS SR 3.8.1.20), which is consistent with the intent of the CTS. This Surveillance is currently not required since it ensures all the DGs are OPERABLE (and no more than one DG is required while in MODES 4 and 5 and handling irradiated fuel assemblies in the secondary containment). In addition, two other exceptions have been included for clarity. CTS 4.9.A.1.b (ITS SR 3.8.1.9) is excluded since only one offsite circuit is required to be OPERABLE. ITS SR 3.8.1.21, the added requirement, for the opposite unit power sources, is excluded because the opposite unit's DG is not required to be OPERABLE by LCO 3.8.2. | SR 3.8.2.1 | 4.9.B |
| | | | |
| 3.8.3, Diesel Fuel Oil and Starting Air | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.8.3 | 3.9.A Action 7, 4.9.A.2.f, 4.9.A.5, 4.9.A.6, 4.9.A.10, 4.9.B |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.8 - ELECTRIC POWER SYSTEMS**

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|--------------------------------------|--|--------------------|---|
| A.2 | The fuel oil and starting air requirements of CTS 3/4.9.A and 3/4.9.B have been moved to a new ITS LCO 3.8.3. An LCO Statement has been provided requiring fuel oil storage and starting air. The Applicability of this new LCO is "when associated DG is required to be OPERABLE." This covers the current MODES 1, 2, 3, 4, and 5 and fuel handling requirements of CTS 3/4.9.A and 3/4.9.B. | 3.8.3 | 3/4.9.A, 3/4.9.B |
| A.3 | Adds ITS ACTIONS Note "Separate Condition entry is allowed for each DG," which is consistent with the intent of the CTS. | 3.8.3 ACTIONS Note | 3.9.A Actions, 3.9.B Actions |
| A.4 | Moves the technical content of CTS 4.9.A.5 and 4.9.A.6, which provide the DG fuel oil sampling requirements, to ITS 5.5.9. In addition, adds a Surveillance Requirement to clarify that the tests of the Diesel Fuel Oil Testing Program must also be completed and passed for determining Operability of the DGs. | SR 3.8.3.1, 5.5.9 | 4.9.A.5, 4.9.A.6 |
| | | | |
| 3.8.4, DC Sources - Operating | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.8.4 | 3/4.9.C |
| A.2 | Moves the technical content of CTS Table 4.9.C-1 (including CTS 4.9.C.1.a and 4.9.C.2.a) and 3.9.C Actions 4, 5, and 6, the battery cell parameter requirements and CTS 4.9.C.2.c, the average electrolyte temperature requirements to ITS 3.8.6. | 3.8.6 | 3.9.C Actions 4, 5, and 6, 4.9.C.1.a, 4.9.C.2.a, 4.9.C.2.c, Table 4.9.C-1 |
| A.3 | Not used. | N/A | N/A |
| A.4 | Deletes the explicit requirement in CTS 4.9.C.1.b to verify correct breaker alignment to each battery charger, since the ITS SR 3.8.4.1 requirement to verify battery terminal voltage, on float charge is adequate. | N/A | 4.9.C.1.b |
| A.5 | Added the specific battery charger load values that are equivalent to the manufacturer's ratings. | SR 3.8.4.6 | 4.9.C.3.d |
| | | | |
| 3.8.5, DC Sources - Shutdown | | | |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.8 - ELECTRIC POWER SYSTEMS**

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|---------------------------------------|---|------------------------|--|
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.8.5 | 3/4.9.D |
| A.2 | The ITS present the battery hardware components (battery and charger) in the DC Sources LCO (ITS 3.8.5). The battery cell parameters are presented in a separate LCO (ITS 3.8.6). | 3.8.5, 3.8.6 | 3/4.9.D |
| 3.8.6, Battery Cell Parameters | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.8.6 | 3.9.C Actions 4, 5, and 6, 4.9.C.1.a, 4.9.C.2.a, 4.9.C.2.c, Table 4.9.C-1, 3/4.9.D |
| A.2 | Presents the 250 and 125 VDC battery cell parameters limits in a separate LCO with appropriate ACTIONS and SRs. In addition, the reference in CTS 3.9.C to Table 4.9.C-1 has been replaced with limits since all battery parameters (i.e., average electrolyte temperature) are not specified in the Table. CTS 4.9.D is being deleted since its provisions only reference requirements in CTS 4.9.C, which are contained in ITS 3.8.6. | 3.8.6 | 3/4.9.C, 3/4.9.D |
| A.3 | Applicability presented as "when associated DC electrical power subsystem is required to be OPERABLE," covering the current MODES 1, 2, 3, 4, and 5 and fuel handling requirements. | 3.8.6 Applicability | 3.9.C Applicability, 3.9.D Applicability |
| A.4 | Adds ITS ACTIONS Note "Separate condition entry is allowed for each battery," which is consistent with the intent of the CTS. | 3.8.6 ACTIONS Note | 3.9.C Actions, 3.9.D Actions |
| A.5 | CTS 3.9.C Action 4 allows the Category A parameters(s) to be not within limits and the battery to be considered OPERABLE, provided the associated battery charger is OPERABLE. The specific requirement for the battery charger has been deleted. Whenever any required DC battery charger is inoperable, entry into the associated actions for the DC sources is required (CTS 3.9.C Action 1 and 2 and ITS 3.8.4 ACTIONS). Therefore, the explicit requirement is not necessary in the ITS. | N/A | 3.9.C Action 4 |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.8 - ELECTRIC POWER SYSTEMS**

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|--|---|----------------|--|
| A.6 | Adds a specific Condition to explicitly require the battery to be declared inoperable when the temperature is not within limit or when Category A or B limits have not been restored within the applicable time, since this is the obvious intent of the CTS. | 3.8.6 ACTION B | 3.9.C Actions 4, 5, and 6, 3.9.D Actions |
| | | | |
| 3.8.7, Distribution Systems - Operating | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.8.7 | 3/4.9.E |
| A.2 | Describes the AC and DC power distribution systems using the designator "Division 1 and Division 2," since these are the actual division designators for the buses listed in CTS LCO 3.9.E (the current detailed listings are relocated to the Bases - see DOC LA.1 for ITS 3.8.7). | LCO 3.8.7 | LCO 3.9.E.1, LCO 3.9.E.2 |
| | | | |
| 3.8.8, Distribution Systems - Shutdown | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.8.8 | 3/4.9.F |
| | | | |

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|--|--|------------------------|---|
| 3.9.1, Refueling Equipment Interlocks | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.9.1 | 3/4.10.A |
| A.2 | Moves the Refuel Position One-Rod-Out Interlock requirements to ITS 3.9.2. | 3.9.2 | 3/4.10.A |
| A.3 | Since one-rod-out interlock requirements are moved to ITS 3.9.2, restrictions on equipment to be used during CORE ALTERATIONS in ITS 3.9.1 are rewritten, where the Applicability addresses the only CORE ALTERATIONS remaining, i.e., fuel movement. | 3.9.1 | 3.10.A |
| A.4 | Lists each actual refuel platform hoist in the Surveillance Requirement of ITS SR 3.9.1.1, versus the CTS requirement for the refuel platform "hoists" fuel loaded interlocks be Operable. | SR 3.9.1.1 | 3.10.A.2.c |
| A.5 | Changed the Applicability to specify "during in-vessel fuel movement...", as currently found in CTS 3.10.A.2. <i>(well as specifying the equipment being used "... with equipment associated with the interlocks...")</i> | 3.9.1 | 3.10.A.2 |
| A.6 | Moves to ITS 3.10.1 the allowance in the footnote to place the reactor mode switch in the Run or Startup/Hot Standby to test the reactor mode switch interlock functions. Additionally, moves to ITS 3.10.2 and 3.10.3 the Refuel Position Refueling Equipment Interlock requirements for MODES 3 and 4 (as shown in the Applicability of CTS 3.10.A). | 3.10.1, 3.10.2, 3.10.3 | 3.10.A Applicability, 3.10.A footnote (d) |
| A.7 | Deletes Applicability footnote that provides a cross reference to CTS 3.12.A and 3.12.B, since the format of the ITS does not include providing cross references. | N/A | 3.10.A footnote (b) |
| A.8 | Deletes the Applicability footnote that states that the reactor shall be maintained in Operational MODE 5 whenever fuel is in the reactor vessel with the vessel head closure bolts less than fully tensioned or with the head removed, since this equipment is an explicit part of the definition of MODE 5. | N/A | 3.10.A footnote (c) |
| 3.9.2, Refuel Position One-Rod-Out Interlock | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.9.2 | 3/4.10.A |
| A.2 | Deletes the requirement that the reactor mode switch shall be in the Shutdown or Refuel position, since it is an explicit part of the definition of MODE 5. | N/A | 3.10.A |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|--|--|------------------------|---|
| A.3 | Moves the Refueling Equipment Interlock requirements to ITS 3.9.1. | 3.9.1 | 3/4.10.A |
| A.4 | The ITS Applicability reflects the current requirements for the one-rod-out interlock to be Operable in MODE 5 with the reactor mode switch in the refuel position and any control rod withdrawn. | 3.9.2 | 3.10.A.1 |
| A.5 | Moves to ITS 3.10.1 the allowance in the footnote to place the reactor mode switch in the Run or Startup/Hot Standby to test the reactor mode switch interlock functions. Additionally, moves to ITS 3.10.2 and 3.10.3 the Refuel Position One-Rod-Out Interlock requirements for MODES 3 and 4 (as shown in the Applicability of CTS 3.10.A). | 3.10.1, 3.10.2, 3.10.3 | 3.10.A Applicability, 3.10.A footnote (d) |
| A.6 | Deletes Applicability footnote that provides a cross reference to CTS 3.12.A and 3.12.B, since the format of the ITS does not include providing cross references. | N/A | 3.10.A footnote (b) |
| A.7 | Deletes the Applicability footnote that states that the reactor shall be maintained in Operational MODE 5 whenever fuel is in the reactor vessel with the vessel head closure bolts less than fully tensioned or with the head removed, since this equipment is an explicit part of the definition of MODE 5. | N/A | 3.10.A footnote (c) |
| 3.9.3, Control Rod Position | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.9.3 | 3/4.10.C |
| A.2 | Deletes footnotes that provides a cross reference to CTS 3.10.I, 3.10.J and 3.12.B since the format of the ITS does not include providing cross references. In addition, the allowances that fuel can be loaded into the core when a rod is withdrawn under control of the reactor mode switch refuel position one-rod-out interlock has been deleted since the interlock will preclude fuel loading with a rod withdrawn. | N/A | 3.10.C footnotes (a) and (b), 3.10.C Action, 4.10 C.1.b |
| 3.9.4, Control Rod Position Indication | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.9.4 | 3/4.3.I |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|---|---|--------------------|-----------------------------------|
| A.2 | Deletes footnote that provides a cross reference to CTS 3.10.I and 3.10.J, since the format of the ITS does not include providing cross references. | N/A | 3.3.I footnote (a) |
| A.3 | Adds ITS Note "Separate Condition entry is allowed for each required channel," which is consistent with the intent of the CTS. | 3.9.4 ACTIONS Note | 3.3.I Action 3 |
| | | | |
| 3.9.5, Control Rod OPERABILITY - Refueling | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.9.5 | 3/4.3.G |
| A.2 | Revises the Operational MODE 5 requirements to say "Each withdrawn control rod shall be OPERABLE," since ITS 3.9.5 includes requirements other than accumulator requirements. | 3.9.5 | 3.3.G |
| A.3 | Deletes footnote that provides a cross reference to CTS 3.10.I and 3.10.J, since the format of the ITS does not include providing cross references. | N/A | 3.3.G footnote (a) |
| A.4 | Deletes "unless the control rod is inserted and disarmed or scrammed," since stating the conditions for an exception to performance of the accumulator Surveillance that are equivalent to the Applicability of the LCO is unnecessary. | N/A | 4.3.G |
| A.5 | Deletes the action to disarm and the footnote to intermittently rearm the associated directional control valves. During MODE 5 with an accumulator associated with a withdrawn control rod inoperable, the control rod is required to be inserted. Once the control rod is fully inserted, the accumulator is no longer required to be OPERABLE and the entry conditions for the ACTIONS are no longer applicable, thus no additional ACTIONS are required. | N/A | 3.3.G Action 2.a and footnote (b) |
| A.6 | Moves, to ITS 3.10.7, the requirements for when more than one control rod is withdrawn with the associated scram accumulators inoperable or no control rod drive pump operating. | 3.10.7 | 3.3.G Action 2.b |
| | | | |
| 3.9.6, RPV Water Level - Irradiated Fuel | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.9.6 | 3/4.10.G |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|--|---|--|-----------------|
| A.2 | Moves, to ITS 3.9.7, the requirements for handling new fuel assemblies and control rods. | 3.9.7 | 3/4.10.G |
| A.3 | Deletes "while in OPERATIONAL MODE 5" from the Applicability since the Specification deals only with handling irradiated fuel assemblies, and the only MODE where it is possible to move irradiated fuel assemblies within the reactor pressure vessel is MODE 5. | N/A | 3.10.G |
| | | | |
| 3.9.7, RPV Water Level - New Fuel or Control Rods | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.9.7 | 3/4.10.G |
| A.2 | Deletes "while in OPERATIONAL MODE 5" from the Applicability since the Specification deals only with handling new fuel assemblies or control rods, and the only MODE where it is possible to move new fuel assemblies or handle control rods within the reactor pressure vessel is MODE 5. | N/A | 3.10.G |
| | | | |
| 3.9.8, Residual Heat Removal (RHR) - High Water Level | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.9.8 | 3/4.10.K |
| A.2 | Requires only that loading of irradiated fuel assemblies into the reactor pressure vessel be suspended versus CTS requirement that all operations involving an increase in the reactor decay heat load be suspended, since this is the only practical method of increasing the reactor decay heat load. | 3.9.8 Required Action B.1 | 3.10.K Action ① |
| A.3 | Enhances presentation by requiring actions to be immediately initiated to restore secondary containment boundary (completing the actions as soon as possible) in lieu of current requirement to establish within 4 hours (initiating the actions as soon as possible). | 3.9.8 Required Actions B.2, B.3, and B.4 | 3.10.K Action ① |
| A.4 | Replaces the use of the defined term SECONDARY CONTAINMENT INTEGRITY with the essential elements of that definition. | 3.9.8 Required Actions B.2, B.3, and B.4 | 3.10.K Action ① |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|---|---|-------------|-------------|
| A.5 | Revises CTS 4.10.K to require the verification of each required RHR shutdown cooling subsystem manual and power operated valve in the flow path, that is not locked, sealed or otherwise secured in position, is in the correct position or can be aligned to the correct position. This is consistent with the SER for Amendments 157 (Unit 1) and 153 (Unit 2) since the RHR System and the RHR Service Water System flow can not be throttled sufficiently to maintain constant temperature. | SR 3.9.8.2 | 4.10.K |
| | | | |
| 3.9.9, Residual Heat Removal (RHR) - Low Water Level | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.9.9 | 3/4.10.L |
| A.2 | Revises CTS 4.10.L to require the verification of each required RHR shutdown cooling subsystem manual and power operated valve in the flow path, that is not locked, sealed or otherwise secured in position, is in the correct position or can be aligned to the correct position. This is consistent with the SER for Amendments 157 (Unit 1) and 153 (Unit 2) since the RHR System and the RHR Service Water System flow can not be throttled sufficiently to maintain constant temperature. | SR 3.9.9.2 | 4.10.L |
| | | | |
| Current Specification 3/4.10.E, Communications | | | |
| NONE | NONE | NONE | NONE |
| | | | |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|--|--|-------------|--------------------------------------|
| 3.10.1, Reactor Mode Switch Interlock Testing | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.10.1 | Table 1-2, 3/4.10.A footnote d |
| | | | |
| 3.10.2, Single Control Rod Withdrawal - Hot Shutdown | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.10.2 | Table 1-2, 3/4.10.A |
| A.2 | Revises CTS 3.10.A Action 2 requiring the reactor mode switch to be locked in the Shutdown position when the one-rod-out interlock is inoperable to only require the mode switch to be placed in Shutdown; locking the mode switch in Shutdown is not required since with the mode switch in Shutdown the LCO is no longer applicable. | N/A | 3.10.A Action 2 |
| A.3 | Replaces the refuel position one-rod-out interlock Surveillances (CTS 4.10.A.1, 4.10.A.2, and 4.10.A.3) with a generic Surveillance Requirement (proposed SR 3.10.2.1) to perform all required Surveillances in accordance with the applicable SRs; in this case, with the SRs of ITS 3.9.2, Refuel Position One-Rod-Out Interlock. | SR 3.10.2.1 | 4.10.A.1, 4.10.A.2, 4.10.A.3 |
| | | | |
| 3.10.3, Single Control Rod Withdrawal - Cold Shutdown | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.10.3 | Table 1-2, 3/4.10.A, 3/4.10.I |
| A.2 | Deletes statements that require compliance with the Specification "until a control rod and associated control rod drive mechanism are reinstalled and the control rod is fully inserted in the core," since such statements are fundamentally true for all Specifications and do not need to be stated in each individual Specification. | N/A | 3/4.10.I |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|-------|--|--|------------------------------------|
| A.3 | Since the MODE 4 requirements for SRM OPERABILITY and Surveillance testing are adequate without explicit reference to them, the CTS 3.10.1.2 and 4.10.1.2 references are redundant to the current and proposed requirement, and therefore, have been deleted. | N/A | 3.10.1.2, 4.10.1.2 |
| A.4 | CTS 3.10.1.3.a and CTS 3.10.1.3.b refer to an exception to the current normal SDM requirements, which requires additional margin for immovable control rods. ITS 3.10.3 does not explicitly include the last half of existing 3.a or any of the existing 3.b, but only identifies that the withdrawn rod is considered to be the "highest worth control rod," which in the CTS definition and in the ITS definition of SHUTDOWN MARGIN is assumed to be fully withdrawn. | 3.10.3 | 3.10.1.3.a, 3.10.1.3.b |
| A.5 | Deletes CTS 3.10.1.4.b and 4.10.1.4.b allowing the four fuel assemblies surrounding the control rod or control rod drive mechanism to be removed from the core and/or reactor vessel to be removed from the core since during MODE 4, the optional requirement of CTS 3.10.1.4.b and 4.10.1.4.b cannot be physically met. | N/A | 3.10.1.4.b, 4.10.1.4.b |
| A.6 | Four new Notes have been added for clarity in ITS 3.10.3. The ITS 3.10.3 ACTIONS Note has been added to clarify that the requirement to enter the applicable condition of the affected Specification applies for each of the affected Specifications. ITS 3.10.3 Required Action A.1 Note 1 has been added to clarify that if an affected Specifications ACTIONS state to fully insert all insertable control rods, this includes placing the reactor mode switch in the Shutdown position. ITS 3.10.3 Required Action A.1 Note 2 has been added to clarify that this Required Action is only applicable if the requirement not met is an LCO, since it is written only for an LCO, not a "requirement." ITS SR 3.10.3.2 Note has been added clarifying that if proposed SR 3.10.3.1 is satisfied for ITS 3.10.3.c.1 requirements, then ITS SR 3.10.3.2 is not required to be performed. | 3.10.3 ACTIONS Note, 3.10.3 Required Action A.1 Notes 1 and 2, SR 3.10.3.2 Note | N/A |
| A.7 | Separates the CTS 3.10.1 ACTION into two ACTIONS, dependent on whether the affected control rod is insertable or not. ITS 3.10.3 ACTIONS are a more detailed presentation of the existing requirement to "initiate action to satisfy the above requirements." | 3.10.3 | 3.10.1 ACTION |
| A.8 | Replaces the refuel position one-rod-out interlock Surveillances CTS 4.10.A.1, 4.10.A.2, and 4.10.A.3 with a generic Surveillance Requirement (proposed SR 3.10.3.1) to perform all required Surveillances in accordance with the applicable SRs since ITS 3.10.3 requires the refuel position one-rod-out interlock to be OPERABLE in accordance with ITS 3.9.2. | SR 3.10.3.1 | 4.10.A.1, 4.10.A.2, 4.10.A.3 |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|---|--|-------------------------|---------------------------|
| A.9 | Revises CTS 3.10.A Action 2 requiring the reactor mode switch to be locked in the Shutdown position when the one-rod-out interlock is inoperable to only require the mode switch to be placed in Shutdown; locking the mode switch in Shutdown is not required since with the mode switch in Shutdown the LCO is no longer applicable. | N/A | 3.10.A Action 2 |
| | | | |
| 3.10.4, Single Control Rod Drive Removal - Refueling | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.10.4 | 3/4.10.I |
| A.2 | Deletes statements that require compliance with the Specification "until a control rod and associated control rod drive mechanism are reinstalled and the control rod is fully inserted in the core," since such statements are fundamentally true for all Specifications and do not need to be stated in each individual Specification. | N/A | 3/4.10.I |
| A.3 | Since the MODE 5 requirements for SRM OPERABILITY and Surveillance testing are adequate without explicit reference to them, the CTS 3.10.I.2 and 4.10.I.2 references are redundant to the current and proposed requirement, and therefore, have been deleted. | N/A | 3.10.I.2, 4.10.I.2 |
| A.4 | CTS 3.10.I.3.a and CTS 3.10.I.3.b refer to an exception to the current normal SDM requirements, which requires additional margin for immovable control rods. ITS 3.10.4 does not explicitly include the last half of existing 3.a or any of the existing 3.b, but only identifies that the withdrawn rod is considered to be the "highest worth control rod," which in the CTS definition and in the ITS definition of SHUTDOWN MARGIN is assumed to be fully withdrawn. | 3.10.4 | 3.10.I.3.a, 3.10.I.3.b |
| A.5 | Deletes the explicit allowance of CTS 3.10.I.4.b and 4.10.I.4.b, to remove the four fuel assemblies in lieu of inserting and disarming the control rods in a 5 x 5 array since this can be done provided the requirements of ITS 3.10.5 (CTS 3.10.J) are followed. | N/A | 3.10.I.4.b, 4.10.I.4.b |
| A.6 | Added a MODE 5 Applicability requirement in ITS 3.10.4 ("with LCO 3.9.5 not met") that is derived from the intent of CTS 3.10.I, which says "the associated control rod drive mechanism may be removed from ... the reactor pressure vessel..." When the control rod drive mechanism is removed, ITS 3.9.5, which requires all withdrawn control rods to be OPERABLE, is not met. | 3.10.4 Applicability | N/A |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|--|--|------------------------------------|-------------------------|
| A.7 | Adds an alternative Required Action (which results in effectively exiting this Special Operations LCO and restores operation consistent with normal requirements for failure to meet the LCOs which were suspended by the Special Operations LCO) to initiate action to fully insert all control rods immediately, in lieu of meeting the requirements of the LCO. | 3.10.4 Required Action A.2.1 | N/A |
| | | | |
| 3.10.5, Multiple Control Rod Withdrawal - Refueling | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.10.5 | 3/4.10.J |
| A.2 | Deletes statements that require compliance with the Specification "until all control rods and control rod drive mechanisms are reinstalled and all control rods are inserted in the core," since such statements are fundamentally true for all Specifications and do not need to be stated in each individual Specification. | N/A | 3.10.J, 4.10.J.1 |
| A.3 | Since the MODE 5 requirements for SRM OPERABILITY and Surveillance testing are adequate without explicit reference to them, the CTS 3.10.J.2 and 4.10.J.1.b references are redundant to the current and proposed requirement, and therefore, have been deleted. | N/A | 3.10.J.2, 4.10.J.1.b |
| A.4 | Deletes redundant references, since the current MODE 5 requirements for SHUTDOWN MARGIN (SDM) in CTS 3.10.J.3 and Surveillance testing in CTS 4.10.J.1.c are adequate without explicit reference to them. | N/A | 3.10.J.3, 4.10.J.1.c |
| A.5 | Adds a MODE 5 Applicability requirement in ITS 3.10.5 ("with LCO 3.9.3, LCO 3.9.4, or LCO 3.9.5 not met") is derived from the intent of CTS 3.10.J, which says "Any number of control rods and/or control rod drive mechanisms may be removed from the core and/or reactor pressure vessel..." During the performance of these activities, ITS 3.9.3 (which requires all control rods to be fully inserted), ITS 3.9.4 (which requires each control rod full-in position indication channel for each control rod to be OPERABLE), and ITS 3.9.5 (which requires all withdrawn control rods to be OPERABLE) are not met. | 3.10.5 | N/A |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|---|---|--|--|
| A.6 | Adds an alternative Required Action (which results in effectively exiting this Special Operations LCO and restores operation consistent with normal requirements for failure to meet the LCOs which were suspended by the Special Operations LCO) to initiate action to fully insert all control rods immediately, in lieu of meeting the requirements of the LCO. | 3.10.5 Required Action A.3.1 | N/A |
| 3.10.6, Control Rod Testing - Operating | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| 3.10.7, SDM Test - Refueling | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 3.10.7 | 3/4.1.A, Table 3.1.A-1, Table 4.1.A-1, 3.3.G, 3.3.H, 3/4.12.B |
| A.2 | Deletes the exceptions in CTS 3.12.B to CTS 3.10.A (ITS 3.9.1 and ITS 3.9.2) and CTS 3.10.C (ITS 3.9.3) since in the ITS the corresponding Specification no longer requires the reactor mode switch to be locked in Refuel at all times while in MODE 5 and since CTS 3.12.B (ITS 3.10.7) precludes all other CORE ALTERATIONS from taking place. | N/A | 3.12.B |
| A.3 | Deletes the current explicit reference to MODE 5 requirements in CTS 3.12.B.1 and 4.12.B.1 for SRM OPERABILITY and Surveillance testing since the reference is redundant to the current and proposed requirements. | N/A | 3.12.B.1, 4.12.B.1 |
| A.4 | The current requirements for control rod coupling in MODE 5 (CTS 3.3.H) are proposed to be delineated as specific restrictions for SDM in MODE 5 (ITS LCO 3.10.7.c), since they are deleted as normal MODE 5 requirements. This change includes an appropriate ACTION (ITS 3.10.7 ACTION A) and Surveillance (proposed SR 3.10.7.5), consistent with those described in ITS 3.1.3, which governs the MODES 1 and 2 control rod coupling requirements. | LCO 3.10.7.c, 3.10.7 ACTION A, SR 3.10.7.5 | 3.3.H |

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|---|--|------------------------------------|------------------|
| A.5 | Revises Applicability to clarify actual applicable conditions for the proposed LCO; ITS Applicability now includes with LCO 3.1.8 not met since this is the intent of when the LCO is to be used. <i>"with the reactor mode switch in the Startup/Hot Standby position"</i> | 3.10.7 | 3.12.B |
| A.6 | Adds two new Notes in ITS 3.10.7 for clarity. SR 3.10.7.2 Note has been added to CTS 4.12.B.2 clarifying that if proposed SR 3.10.7.3 is satisfied for ITS LCO 3.10.7.b.1 requirements, then proposed SR 3.10.7.2 is not required to be met and proposed SR 3.10.7.3 Note has been added to CTS 4.12.B.2 clarifying that if proposed SR 3.10.7.2 is satisfied for ITS LCO 3.10.7.b.2 requirements, then SR 3.10.7.3 is not required to be met. | SR 3.10.7.2 Note, SR 3.10.7.3 Note | N/A |
| A.7 | Deletes CTS 3.3.G Action 2.b which provides actions if multiple control rod scram accumulators are inoperable in MODE 5 since the multiple, inoperable withdrawn control rod accumulator requirement is already covered by ITS 3.9.5. | N/A | 3.3.G Action 2.b |
| A.8 | Includes APRM requirements of CTS 3/4.1.A in equivalent requirements of ITS 3.10.7. | 3.10.7 | 3/4.1.A |
| A.9 | Modifies APRM Mode 2 requirements of CTS Tables 3.1.A-1 (including the Actions and Surveillance Requirements) to equivalent MODE 5 requirements in ITS 3.10.7. | 3.10.7 | 3/4.1.A |
| A.10 | Revises CTS 3/4.1.A provided in the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter, dated December 27, 1999. | 3.10.7 | 3/4.1.A |
| | | | |
| Current Specification 3/4.12.A, Primary Containment Integrity | | | |
| NONE | NONE | NONE | NONE |
| | | | |

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 4.0 - DESIGN FEATURES

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|-------|--|-------------|--------------|
| A.1 | Editorial changes, reformatting, and revised numbering. | 4.0 | 5.0 |
| A.2 | Not Used . | N/A | N/A |
| A.3 | Deletes the information that radioactive gaseous effluents and radioactive liquid effluents be located in the OFFSITE DOSE CALCULATION MANUAL. | N/A | 5.1.C, 5.1.D |
| | | | |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|---------------------------------------|--|------------------|------------------|
| 5.1, Responsibility | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 5.1 | 6.1.A, 6.1.B |
| | | | |
| 5.2, Organization | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 5.2 | 6.2.A, 6.2.B |
| A.2 | Replaces the term "health physics" with the equivalent term "radiation protection" and replaces the title of the individual qualified to implement radiation protection procedures from "Radiation Protection Technician" to the generic function "radiation protection technician." | 5.2.1.d, 5.2.2.d | 6.2.A.4, 6.2.B.4 |
| | | | |
| 5.3, Unit Staff Qualifications | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 5.3 | 6.3 |
| A.2 | Deletes the details for qualification requirements of the Shift Technical Advisor (STA) position since they are addressed in the "Commission Policy Statement on Engineering Expertise on Shift" specified in ITS 5.2.2.d. <i>(f)</i> | 5.2.2.d <i>f</i> | 6.3 |
| | | | |
| 5.4, Procedures | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 5.4 | 6.8.A |
| A.2 | Deletes specific requirements for written procedures to implement the Station Security Plan and the Generating Station Emergency Response Plan since they are also required by 10 CFR 50.54(p) and 10 CFR 50, Appendix E. | N/A | 6.8.A.3, 6.8.A.4 |
| A.3 | Deletes specific requirement for written procedures for ODCM implementation since it is covered by a more generic item, ITS 5.4.1.d, which requires this activity for all Programs and Manuals. | 5.4.1.d | 6.8.A.6 |

(Rev D)

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS**

| 5.5, Programs and Manuals | | | |
|---------------------------|---|--------------------------|--|
| A.1 | Editorial changes, reformatting, and revised numbering. | 5.5 | 1.0, 4.0.E, 4.7.P, 4.8.D, 3/4.8.H, 3/4.8.J, 4.9.A, 6.8, 6.14 |
| A.2 | A statement of applicability of SR 3.0.2 has been added to CTS 6.8.D.1 (ITS 5.5.2), a statement of applicability of SR 3.0.3 has been added to CTS 4.0.E (ITS 5.5.6.c), and a statement of applicability of SR 3.0.2 and SR 3.0.3 has been added to CTS 6.8.D.4 (ITS 5.5.4). | 5.5.2, 5.5.6.c, 5.5.4 | 6.8.D.1, 4.0.E, 6.8.D.4 |
| A.3 | Revises wording describing the Radioactive Effluent Controls Program to provide clarity. | 5.5.4.d, 5.5.4.f | 6.8.D.4.d, 6.8.D.4.f |
| A.4 | Deletes the statement that exempts the requirements of CTS 4.0.B from applying to the frequencies specified in the Primary Containment Leakage Rate Testing Program; the statement is redundant since in the ITS, the ITS Section 3.0 requirements only applies to ITS Sections 3.1 through 3.10. | N/A | 6.8.D.5 |
| A.5 | Deletes redundant restatement that all applicable requirements must be met. | N/A | 4.0.E.4 |
| A.6 | Places the filter testing requirements for the Standby Gas Treatment System and the Control Room Emergency Ventilation System in a program, with a general program statement added as ITS 5.5.7. A statement of applicability of SR 3.0.2 and SR 3.0.3 is added to clarify that the allowances for Surveillance Frequency extensions do apply, since these SRs are not normally applied to Frequencies identified in the Administrative Controls Chapter. | 5.5.7 | 4.7.P.2, 4.7.P.3, 4.7.P.4, 4.7.P.5, 4.7.P.6, 4.8.D.3, 4.8.D.4, 4.8.D.5, 4.8.D.6, 4.8.D.7 |
| A.7 | Revises for clarity the reference to Regulatory Guide 1.52, Revision 2, March 1978 by adding a reference to ANSI/ASME N510-1980 for the in-place charcoal adsorber testing of the Standby Gas Treatment System and Control Room Emergency Ventilation System. | 5.5.7 | 4.7.P.2.a, 4.8.D.3.a |

**TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS**

| | | | |
|------------------------------------|--|---------------------|--------------------------------|
| A.8 | Places the Offgas Explosive Mixture requirements in a program, with a general program statement added as ITS 5.5.8. A statement of applicability of SR 3.0.2 and SR 3.0.3 is added to clarify that the allowances for Surveillance Frequency extensions do apply, since these SRs are not normally applied to Frequencies identified in the Administrative Controls Chapter. | 5.5.8 | 3.8.H |
| A.9 | Places the diesel fuel oil testing requirements in a program, with a general program statement added as ITS 5.5.9. A statement of applicability of SR 3.0.2 and SR 3.0.3 is added to clarify that the allowances for Surveillance Frequency extensions do apply, since these SRs are not normally applied to Frequencies identified in the Administrative Controls Chapter. | 5.5.9 | 4.9.A.5, 4.9.A.6 |
| A.10 | Clarifies the Inservice Testing Program requirements by adding a frequency definition of "Every 48 months." | 5.5.6 | 4.0.E |
| A.11 | Added statement that the testing of filter trains following painting, fire, or chemical release is only required if the painting, fire, or chemical release could adversely affect the filter bank or charcoal adsorber capability. | 5.5.7 | 4.7.P.2, 4.8.D.3 |
| 5.6, Reporting Requirements | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 5.6 | Table 3.2.F-1, 6.9 |
| A.2 | Requires submittal of reports in accordance with 10 CFR 50.4, versus the CTS requirement that reports be submitted to the Regional Office. | 5.6 | 6.9, 6.9.A.5, 6.9.A.6.c, 6.9.B |
| A.3 | Deletes subtitles of reports since each individual report is named rather than grouped under subtitles. | 5.6 | 6.9 |
| A.4 | Allows a single report submittal to satisfy the Occupational Radiation Exposure, Annual Radiological Environmental Operating, and Radioactive Effluent Release reporting requirement for both units. | 5.6.1, 5.6.2, 5.6.3 | 6.9.A.2.a, 6.9.A.3, 6.9.A.4 |
| A.5 | Adds another name (electronic dosimeter) for a new type of pocket dosimeter currently in use to estimate the whole body doses required to be reported. | 5.6.1 | 6.9.A.2.a |

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

| | | | |
|---|---|--------------|-----------------------------|
| A.6 | Deletes the requirement to report the results of specific activity analysis in which the primary coolant exceeded CTS 3.6.J limits, since it is included in the LER requirements to report fuel cladding failures that exceed expected values or that are caused by unexpected factors, i.e., being seriously degraded. | N/A | 6.9.A.2.b |
| A.7 | Requires the Radioactive Effluent Release Report submittal to be "in accordance with 10 CFR 50.36a," in lieu of the current requirement to submit the report "prior to April 1 of each year," since compliance with 10 CFR 50 requirements is required by the Dresden 2 and 3 <i>Quad Cities and 2</i> Operating Licenses. | 5.6.3 | 6.9.A.4 |
| A.8 | Deletes duplicate requirement; i.e., the general statement to submit special reports within the time period specified for each report. | N/A | 6.9.B |
| A.9 | Adds a reference to the LHGR limit and the transient linear heat generation rate limit consistent with the limits currently specified in the CORE OPERATING LIMITS REPORT. | 5.6.5.a.4 | 6.9.A.6 |
| | | | |
| 5.7, High Radiation Area | | | |
| A.1 | Editorial changes, reformatting, and revised numbering. | 5.7 | 6.12 |
| A.2 | Replaces the term "health physics" with the equivalent term "radiation protection" and replaces the title of the individual qualified to implement radiation protection procedures from "Radiation Protection Technician" to the generic function "radiation protection technician." | 5.7.1, 5.7.2 | 6.12.A footnote (a), 6.12.B |
| | | | |
| Current Specification 6.4, Training | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| Current Specification 6.7, Safety Limit Violation | | | |
| A.1 | Removes the Safety Limit Violation requirements, as they relate to NRC notification and permission to restart the unit, that are contained in and based upon the requirements located in 10 CFR 50.36(c)(1), 10 CFR 50.72, and 10 CFR 50.73. | N/A | 6.7 |

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

| | | | |
|--|------|------|------|
| | | | |
| Current Specification 6.11, Radiation Protection Program | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| Current Specification 6.13, Process Control Program | | | |
| NONE | NONE | NONE | NONE |
| | | | |

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
CHAPTER 1.0 - USE AND APPLICATION**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|----------|--|-------------|-------------|
| M.1 | Modifies CTS Table 1.2 by a) the addition of the head closure status (proposed footnote (a)) to MODES 3 and 4, b) the addition of the refuel mode switch position to MODE 2 (including footnote (a)), and c) the deletion of the coolant temperature limit of MODE 5. These changes address plant conditions not previously satisfying a defined MODE, or satisfying more than one MODE. | Table 1.1-1 | Table 1.2 |
| | | | |

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
CHAPTER 2.0 - SAFETY LIMITS

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|-------|---|-------------------------------------|-------------------------------|
| M.1 | Extends the APPLICABILITY of each of the Safety Limits to all MODES of operation. | 2.1.1.1, 2.1.1.2, 2.1.2, 2.1.1.3 | 2.1.A, 2.1.B, 2.1.C, 2.1.D |
| | | | |

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

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|----------|--|-------------|-------------|
| M.1 | The statement, "For Frequencies specified as "once," the above interval extension does not apply," was added to clarify that the 1.25 times the interval specified in the Frequency does not apply to certain Surveillances. | SR 3.0.2 | 4.0.B |
| | | | |

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|--------------------------------|---|---------------------------|---------------------------------|
| 3.1.1, SHUTDOWN MARGIN | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| 3.1.2, Reactivity Anomalies | | | |
| M.1 | The CTS requires the reactivity difference between the actual critical control rod configuration and the predicted critical control rod configuration to be within limits. The CTS Bases clarifies that this verification can be performed by one of two methods: by comparison of the critical rod pattern selected base states to the predicted rod inventory at that state (i.e., rod density comparison) or by comparison of the monitored k_{eff} with the predicted k_{eff} as calculated by an approved 3-D core simulator code. These two methods to meet the CTS were previously approved by the NRC. Since Quad Cities 1 and 2 predicts the core reactivity using a 3-D simulator code and compares predicted k_{eff} with monitored k_{eff} , the alternate approach (i.e., the control rod density comparison) is not necessary and has been deleted. | N/A | 3.3.B |
| | | | |
| 3.1.3, Control Rod OPERABILITY | | | |
| M.1 | Adds a Required Action for a stuck control rod. ITS 3.1.3 Required Action A.1 requires the immediate verification that the stuck control rod separation criteria are met. | 3.1.3 Required Action A.1 | N/A |
| M.2 | Revises the separation criteria for inoperable control rods to ensure the safety analysis assumptions are met. CTS requires the separation criteria to be met only for withdrawn control rods. ITS 3.1.3 Condition D applies to all inoperable control rods (when $\leq 10\%$ RTP) whether inserted or withdrawn. | 3.1.3 Condition D | 3.3.C Actions 1.a.1) and 2.a.1) |
| M.3 | If more than one control rod is stuck, the ITS contains an additional requirement to disarm the stuck control rod, providing a necessary level of protection to the control rod drive should a scram signal occur. In addition, the allowance to disarm a stuck control rod electrically is deleted to prevent potential damage if a scram signal occurs. | 3.1.3 Required Action A.2 | 3.3.C Action 1.a.2)a) |
| M.4 | Not Used. | N/A | N/A |

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|---------------------------------------|---|---|---------------------|
| M.5 | Requires control rods to be inserted in lieu of the CTS requirement for "moving," since the purpose of the test is to assure scram insertion capability and restricting the test to only allow control rod insertion provides an increased likelihood of this test detecting a problem that impacts this capability. | SR 3.1.3.2, SR 3.1.3.3 | 4.3.C.1 |
| M.6 | Revises the requirement for non-stuck inoperable control rods, the check of insertion capability is eliminated and replaced with a requirement to fully insert and disarm all inoperable control rods. | 3.1.3 Action D <i>C</i> | 3.3.C Action 2.a.2) |
| 3.1.4, Control Rod Scram Times | | | |
| M.1 | Added a requirement requiring a scram time test, which may be done at any reactor pressure, prior to declaring the control rod operable (and thus, enabling its withdrawal during a startup). In addition, revises the reactor pressure applicability from > 800 psig to ≥ 800 psig for consistency with the new proposed Surveillance. | SR 3.1.4.1, SR 3.1.4.2, SR 3.1.4.3, SR 3.1.4.4 | 4.3.D |
| M.2 | Revises the requirements of the control rod scram time to ensure the negative scram reactivity corresponding to that used in licensing basis calculations is supported by individual control rod drive scram performance distributions allowed by the Technical Specifications. Provides new individual control rod scram time limits, limits the number of slow control rods to 12, ensures no more than 2 slow rods occupy adjacent locations, and ensures that a control rod is not inadvertently considered "slow" when the scram time exceeds 7 seconds. | 3.1.4, Table 3.1.4-1 | 3.3.D, 3.3.E, 3.3.F |
| 3.1.5, Control Rod Scram Accumulators | | | |
| M.1 | Restricts the current 8 hour allowance to restore an inoperable accumulator to apply only when the reactor pressure is greater than or equal to 950 psig, since control rods may not insert on a scram signal at reduced reactor pressures with the associated accumulator inoperable. | 3.1.5 ACTION A | 3.3.G Action 1.a |
| | | | |

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|--|---|-------------|-------------|
| 3.1.6, Rod Pattern Control | | | |
| M.1 | Adds a new Specification requiring the control rod pattern to be in compliance with the analyzed rod position sequence when THERMAL POWER is $\leq 10\%$ RTP in MODES 1 and 2. This ensures the analysis assumptions relative to the Control Rod Drop Accident are maintained. | 3.1.6 | N/A |
| | | | |
| 3.1.7, Standby Liquid Control System | | | |
| M.1 | Revises the requirement to determine the available concentration of sodium pentaborate in solution anytime water or boron is added to the solution or when the system temperature drops below the limits by adding a 24 hour time period to complete the determination. This ensures that any potential change to the boron concentration is quickly evaluated. | SR 3.1.7.5 | 4.4.A.2.b |
| M.2 | Revises the requirement to demonstrate that the pump suction line from the storage tank is not plugged by adding the requirement to perform this Surveillance once within 24 hours after piping temperature is restored within the limits of ITS Figure 3.1.7-2 (CTS Figure 3.4.A-1). | SR 3.1.7.9 | 4.4.A.4.c |
| | | | |
| 3.1.8, SDV Vent and Drain Valves | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| Current Specification 3/4.3.J, Control Rod Drive Housing Support | | | |
| NONE | NONE | NONE | NONE |
| Current Specification 3/4.3.N, Economic Generation Control System | | | |
| NONE | NONE | NONE | NONE |

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|--|---|-------------|-------------|
| 3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| 3.2.2, MINIMUM CRITICAL POWER RATIO | | | |
| M.1 | Adds a new surveillance (ITS SR 3.2.2.2) which specifies that the MCPR limits must be determined within 72 hours after each completion of ITS SR 3.1.4.1, SR 3.1.4.2, and SR 3.1.4.4 (control rod scram testing). | SR 3.2.2.2 | N/A |
| | | | |
| 3.2.3, LINEAR HEAT GENERATION RATE | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| 3.2.4, APRM GAIN AND SETPOINT | | | |
| NONE | NONE | NONE | NONE |
| | | | |

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|-------------------------------------|--|---|--|
| 3.3.1.1, RPS Instrumentation | | | |
| M.1 | Adds a 24 month CHANNEL CALIBRATION Surveillance for the Scram Discharge Volume Water Level - High (Thermal Switch) Functional Unit to ensure the associated channels are calibrated properly. | SR 3.3.1.1.16 for Table 3.3.1.1-1 Function 7.a | N/A |
| M.2 | Modifies the Frequency of the CHANNEL CHECK requirement of CTS Table 4.1.A-1 Functional Unit 4, Reactor Vessel Water Level - Low, from 24 hours to 12 hours to ensure this Function is maintained OPERABLE. | SR 3.3.1.1.1 for Table 3.3.1.1-1 Function 4 | 4.1.A.1 for Table 4.1.A-1 Functional Unit 4 |
| M.3 | Adds a Surveillance to verify the automatic enabling of the Turbine Stop Valve—Closure and Turbine Control Valve Fast Closure, Control Oil Pressure—Low Functions at $\geq 45\%$ RTP. | SR 3.3.1.1.13 | N/A |
| A.11 | Enhances presentation by requiring actions to be immediately initiated to insert control rods (completing the actions as soon as possible) in lieu of current requirement to insert the control rods in 1 hour (initiating the actions as soon as possible). | 3.3.1.1 Required Action H.1 | Table 3.1.A.1 Actions 13 and 19 |
| 3.3.1.2, SRM Instrumentation | | | |
| M.1 | Places a time limit of 24 hours on how soon prior to the withdrawal of control rods the verification of SRM count rate to be within limits must be performed. In addition, the Surveillance must also be performed once per 24 hours in MODE 2 with IRMs on Range 2 or below and in MODES 3 and 4, regardless of whether or not control rods are withdrawn. Since surveillances must be performed at all times, not just prior to control rod withdrawal, the phrase "before withdrawal of control rods" is not needed and has been deleted. | SR 3.3.1.2.4 | 4.2.G.1 |

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**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | |
|---|--|--|-------------------------|
| M.2 | The CTS Applicability does not require SRMs to be OPERABLE when no more than two fuel assemblies are present in each core quadrant with an SRM when those fuel assemblies are positioned adjacent to that quadrant's SRM. The CTS does however provide specific criteria to be met if movable detectors are being used. The ITS requires at least two SRM channels to be OPERABLE at all times when in MODE 5 (unless performing a spiral offload or reload), but provides specific allowances in the Note to ITS SR 3.3.1.2.4 to verify OPERABILITY for conditions when the removal of fuel assemblies would not maintain the required count rate. | 3.3.1.2, SR 3.3.1.2.4 Note | 3.10.B Applicability |
| M.3 | CTS 4.9.2.a.3 requires verifying that the detector of an OPERABLE SRM channel is located in the core quadrant where CORE ALTERATIONS are being performed and one is located in the adjacent quadrant. ITS SR 3.3.1.2.2 requires verifying that an OPERABLE SRM detector is located in the fueled region; the core quadrant where CORE ALTERATIONS are being performed, when the associated SRM is included in the fueled region; and in a core quadrant adjacent to where CORE ALTERATIONS are being performed, when the associated SRM is included in the fueled region. As a result of providing the additional criteria on where the OPERABLE SRMs must be relocated (one in the fueled region), Note 2 to ITS SR 3.3.1.2.2 is also added to clarify that more than one of the three requirements of ITS SR 3.3.1.2.2 can be satisfied by the same SRM since only two SRMs are required to be OPERABLE. | SR 3.3.1.2.2, including Note 2 | 4.10.B.1.a |
| M.4 | Adds a Surveillance Requirement requiring the SRMs to be calibrated every 24 months if in MODE 5 to verify the performance of the SRM detectors and associated circuitry. | SR 3.3.1.2.7 | N/A |
| M.5 | Adds a restriction to determine signal-to-noise ratio and verify it is greater than or equal to 2:1 or 20:1, depending upon the count rate requirement. (1) | SR 3.3.1.2.6, SR 3.3.1.2.5 | 4.2.G.3, 4.10.B.2 |
| 3.3.2.1, Control Rod Block Instrumentation | | | |
| M.1 | Adds requirements regarding the Reactor Mode Switch—Shutdown Position channels and an associated ACTION and Surveillance Requirement. | Table 3.3.2.1-1 Function 3, 3.3.2.1 ACTION E, SR 3.3.2.1.7 | N/A |
| M.2 | Adds an RBM Surveillance to verify the automatic enabling points of the RBM. | SR 3.3.2.1.5 | N/A |

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

| | | | |
|--|--|---|--|
| M.3 | The Note to ITS SR 3.3.2.1.2 will require the RWM to be determined Operable (by performing a CHANNEL FUNCTIONAL TEST) within 1 hour after withdrawal of any control rod when RTP is $\leq 10\%$, not just when the withdrawal is for the purpose of making the reactor critical. | SR 3.3.2.1.2 Note | 3.3.L Applicability footnote (a), 4.3.L.2 |
| M.4 | With the RWM inoperable, the CTS allows control rod movement to continue provided a second licensed operator or other qualified member of the technical staff verifies control rod movement is in compliance with the prescribed control rod sequence. In the ITS 3.3.2.1, with the RWM inoperable during a reactor startup, continued movement of control rods will only be allowed if ≥ 12 control rods are withdrawn or if a startup with RWM inoperable has not been performed in the last calendar year <u>12 months</u> . | 3.3.2.1 Required Actions C.2.1.1 and C.2.1.2 | 3.3.L Action |
| M.5 | Adds an RWM Surveillance to verify the automatic enabling point of the RWM. | SR 3.3.2.1.6 | N/A |
| M.6 | Adds an RWM Surveillance to verify the bypassing and position of control rods required to be bypassed (taken out of service) in RWM by a second licensed operator or other qualified member of the technical staff. | SR 3.3.2.1.9 | N/A |
| 3.3.2.2, Feedwater System and Main Turbine High Water Level Trip Instrumentation | | | |
| M.1 | Adds the requirement that the channels be capable of also tripping the main turbine, in lieu of the CTS requirement that they trip the feedwater system only. The Specification title, LCO and Required Actions have been modified to reflect this change. | 3.3.2.2 | 3/4.2.J |
| M.2 | Adds a requirement to ensure the trip of the feedwater pump breakers and closure of the turbine stop valves, since the LOGIC SYSTEM FUNCTIONAL TEST definition does not require the actuation of the components. | SR 3.3.2.2.4 | N/A |

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**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | |
|--|--|---|---|
| M.3 | When one channel is inoperable, the CTS allows 7 days to restore a channel to OPERABLE status and then allows an additional 8 hours to trip the channel if not restored to OPERABLE status. When two channels are inoperable, the CTS allows 72 hours to restore at least one channel to OPERABLE status. In the ITS, both of these conditions have been combined into one ACTION which allows 2 hours to restore feedwater system and main turbine high water level trip capability. The Feedwater System and Main Turbine High Water Level Trip Instrumentation channel logic design is a two-out-of-two for trip actuation. Therefore, with any channel inoperable trip capability is lost. | 3.3.2.2 ACTION A | Table 3.2.J-1 Actions 90.a and 90.b |
| M.4 | Increases the Frequency of the CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION requirements for the Reactor Vessel Water Level — High Functional Unit from 18 months to 92 days and 12 months, respectively. | SR 3.3.2.2.2, SR 3.3.2.2.3 | 4.2.J.1 for Table 4.2.J-1 Functional Unit |
| 3.3.3.1, Post Accident Monitoring Instrumentation | | | |
| M.1 | Adds requirements for the Penetration Flow Path Primary Containment Isolation Valve (PCIV) Position Function, since this Function is a Category 1 instrument for Quad Cities 1 and 2. | Table 3.3.3.1-1 Function 6, 3.3.3.1 ACTIONS A, B, C, D, and E, SR 3.3.3.1.1, SR 3.3.3.1.3 | N/A |
| A.3 | The Reactor Vessel Water Level instrumentation in CTS Table 3.2.F-1 consists of instruments with different ranges to satisfy Regulatory Guide 1.97 requirements. The different ranges are: "narrow range" covering approximately 82 inches above the top of active fuel to approximately 202 inches above the top of active fuel; and "wide range" covering approximately 202 inches above the top of active fuel to approximately 198 inches below the top of active fuel. Currently, CTS Table 3.2.F-1 only specifies requirements for two channels but does not specify the required ranges. Using the ITS format, the instruments required to cover these ranges are delineated in ITS Table 3.3.3.1-1 as separate line items under Function 2, with each channel consisting of only one instrument. Therefore, ITS Table 3.3.3.1-1 Function 2.a (Wide Range) and Function 2.b (Narrow Range) will each specify requirements for two channels (for a total of 4 channels). | Table 3.3.3.1 Functions 2.a and 2.b | Table 3.2.F-1 Instrumentation 2 |

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**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | |
|--|---|---|----------------------------------|
| | | | |
| 3.3.4.1, ATWS-RPT Instrumentation | | | |
| M.1 | <p>The ATWS-RPT trip logic uses a two-out-of-two logic for each trip Function in both trip systems. The reactor recirculation pumps will trip when one trip system actuates. Therefore, when a channel associated with one Trip Function (e.g., Reactor Water Level - Low Low) is inoperable in both trip systems, the ATWS-RPT trip capability is lost for that Function. Similarly, if channels associated with both Trip Functions are inoperable in both trip systems, the ATWS-RPT trip capability is lost for both ATWS-RPT trip Functions. CTS 3.2.C Actions 2 and 4 address the condition with channels inoperable in both trip systems. Under these conditions the ATWS-RPT trip capability is lost for one and two Trip Functions, respectively. In the ITS, these conditions will require entry into proposed ITS 3.3.4.1 ACTION B and ACTION C, respectively. The ITS Completion Times (72 hours and 1 hour, respectively) are consistent with the current actions for loss of trip function capability in CTS 3.2.C Actions 5 and 6, respectively, but more restrictive than CTS Actions 2 and 4 which give a 14 day repair completion time.</p> | 3.3.4.1 ACTIONS B and C | 3.2.C Actions 2 and 4 |
| M.2 | <p>Adds a Note to ITS 3.3.4.1 Required Action A.2 to prevent this Required Action from being used if the channels are inoperable due to a trip breaker that will not open, because placing the channels in the tripped condition will not accomplish the intended restoration of the functional capability. This new Note will ensure the functional capability of the ATWS-RPT System is restored (by restoring the inoperable channel) within the allowed Completion Time when a trip breaker is inoperable.</p> | 3.3.4.1 Required Action A.2 Note | 3.2.C Action 2 |
| | | | |
| 3.3.5.1, ECCS Instrumentation | | | |

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | |
|---|---|--|--|
| M.1 | Eight additional Functions have been added. The automatic actuation function of the ECCS subsystems ensure the design basis events can be satisfied. These Functions are included in ITS Table 3.3.5.1-1 as follows: 1) Function 1.e, Core Spray Pump Start - Time Delay Relay; 2) Function 2.d, Reactor Steam Dome Pressure - Low (Break Detection); 3) Function 2.e, LPCI Pump Start - Time Delay Relay for Pumps B and D; 4) Function 2.g, Recirculation Pump Differential Pressure-High (Break Detection); 5) Function 2.h, Recirculation Riser Differential Pressure-High (Break Detection); 6) Function 2.i, Recirculation Pump Differential Pressure Time Delay-Relay (Break Detection); 7) Function 2.j, Reactor Steam Dome Pressure Time Delay-Relay (Break Detection); and 8) Function 2.k, Recirculation Riser Differential Pressure Time Delay-Relay (Break Detection). Appropriate ACTIONS and Surveillances have also been added. | Table 3.3.5.1-1 Functions 1.e, 2.d, 2.e, 2.g, 2.h, 2.i, 2.j, and 2.k | N/A |
| M.2 | Adds a maximum Allowable Value for the CS Pump Discharge Flow—Low (Bypass) Function to ensure the valves will close to provide assumed ECCS flow to the core. | Table 3.3.5.1-1 Function 1.d | Table 3.2.B-1 Functional Unit 1.d |
| M.3 | Increases the Frequency of the CHANNEL CALIBRATION requirement for the HPCI Pump Discharge Flow - Low (Bypass) Functional Unit from 18 months to 92 days. | SR 3.3.5.1.6 | 4.2.B.1 for Table 4.2.B-1 Functional Unit 3.f |
| M.4 | Not used. | N/A | N/A |
| M.5 | Adds a 24 month CHANNEL CALIBRATION Surveillance for the Condensate Storage Tank Level - Low and Suppression Chamber Water Level – High Functions to ensure the associated channels are calibrated properly. | SR 3.3.5.1.8 | N/A |
| | | | |
| 3.3.5.2, RCIC System Instrumentation | | | |
| M.1 | Not used. | N/A | N/A |
| M.2 | Adds a 24 month CHANNEL CALIBRATION Surveillance for the Condensate Storage Tank Level - Low and Suppression Chamber Water Level – High Functions to ensure the associated channels are calibrated properly. | SR 3.3.5.2.5 | N/A |

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | |
|---|---|---------------------------------|---|
| | | | |
| 3.3.6.1, Primary Containment Isolation Instrumentation | | | |
| M.1 | An Allowable Value for a Function has been added. This Function is the Main Steam Line Low Pressure—Timer Function. This Function delays initiation of the Main Steam Line Pressure—Low Function. | Table 3.3.6.1-1 Function 1.c | N/A |
| M.2 | An additional Function, Drywell Pressure—High Function, including appropriate ACTIONS and Surveillance Requirements has been added. This Function isolates the HPCI turbine exhaust vacuum breaker isolation valves coincident with the Reactor Vessel Pressure—Low Function signals. | Table 3.3.6.1-1 Function 3.d | N/A |
| M.3 | Provides the actual number of channels for the SLCS Initiation Function, in lieu of the CTS "NA." | Table 3.3.6.1-1 Function 5.a | Table 3.2.A-1 Functional Unit 4.a |
| | | | |
| 3.3.6.2, Secondary Containment Isolation Instrumentation | | | |
| M.1 | Revised the Applicability for the Reactor Building Ventilation Exhaust Radiation - High and Refueling Floor Radiation - High Functions to include CORE ALTERATIONS. | Table 3.3.6.2-1 footnote (b) | Tables 3.2.A-1 and 4.2.A-1 Functional Units 2.c and 2.d |
| M.2 | Revised the Applicability for the Reactor Building Ventilation Exhaust Radiation - High and Refueling Floor Radiation - High Functions to include operations with the potential for draining the reactor vessel (OPDRVs). | Table 3.3.6.2-1 footnote (a) | Tables 3.2.A-1 and 4.2.A-1 Functional Units 2.c and 2.d |
| | | | |
| 3.3.6.3, Relief Valve Instrumentation | | | |

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | |
|---|--|---|---|
| M.1 | Adds an Allowable Value for the Low Set Relief Valves Reactuation Time Delay Function to ensure the OPERABILITY of the low set relief function. | Table 3.3.6.3-1 Function 1.b | 3.6.F, 4.6.F.1 |
| | | | |
| 3.3.7.1, CREV System Isolation Instrumentation | | | |
| M.1 | Adds new Required Actions to address CREV System inoperabilities, since the CTS does not provide adequate actions (it covers secondary containment issues only). The ITS Required Actions require the isolation of each required control room penetration flow path within 1 hour or the declaration that the CREV System is inoperable within 1 hour. | 3.3.7.1 Required Actions D.1 and D.3 | Table 3.2.A-1 Action 24 |
| M.2 | Revised the Applicability for the Reactor Building Ventilation Exhaust Radiation - High and Refueling Floor Radiation - High Functions to include CORE ALTERATIONS. | Table 3.3.7.1-1 Note (b) | Tables 3.2.A-1 and 4.2.A-1 Functional Units 2.c and 2.d |
| | | | |
| 3.3.7.2, Mechanical Vacuum Pump Trip Instrumentation | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| 3.3.8.1, Loss of Power Instrumentation | | | |
| M.1 | The CTS requires the LOP instruments to be OPERABLE during MODES 4 and 5 only when the associated DG is required to be OPERABLE. In the ITS, the Applicability is being changed to be when the associated DG is required to be OPERABLE by LCO 3.8.2, "AC Sources — Shutdown," which requires the LOP instrumentation to be OPERABLE not only during MODES 4 and 5, but also during movement of irradiated fuel assemblies in the secondary containment. | 3.3.8.1 Applicability | Table 3.2.B-1 footnote (e), Table 4.2.B-1 footnote (c) |

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | |
|---|--|---------------------------------|---|
| M.2 | Adds a maximum Allowable Value for the Degraded Voltage Function to prevent inadvertent power supply transfer. | Table 3.3.8.1-1 Function 2.a | Table 3.2.B-1 Functional Unit 6.b |
| | | | |
| 3.3.8.2, RPS Electric Power Monitoring | | | |
| M.1 | Not used. | N/A | N/A |
| M.2 | Adds time delay setting requirements for the overvoltage, undervoltage, and underfrequency protective devices of the RPS logic electric power monitoring assemblies. | SR 3.3.8.2.2 | N/A |
| | | | |
| Current Specification 3/4.2.H, Explosive Gas Monitoring | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| Current Specification 3/4.2.I, Suppression Chamber and Drywell Spray Actuation | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| Current Specification 3/4.2.K, Toxic Gas Monitoring | | | |
| NONE | NONE | NONE | NONE |
| | | | |

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|---|--|---|-------------------------|
| 3.4.1, Recirculation Loops Operating | | | |
| M.1 | Not Used | N/A | N/A |
| M.2 | Decreases the total time required to be in MODE 3 from 14 to 12 hours. | 3.4.1 Required Actions A.1 A.2 | 3.6.A Action 2 |
| | | | |
| 3.4.2, Jet Pumps | | | |
| M.1 | Deletes a method of demonstrating jet pump OPERABILITY, the number of acceptable methods for demonstrating OPERABILITY is reduced. | N/A | 4.6.B.1.b, 4.6.B.2.b |
| | | | |
| 3.4.3, Safety and Relief Valves | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| 3.4.4, RCS Operational Leakage | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| 3.4.5, RCS Leakage Detection Instrumentation | | | |
| | | | |

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM**

| | | | |
|--|--|-------------------------------------|-------|
| M.1 | Adds the requirement for a CHANNEL FUNCTIONAL TEST to be performed on the drywell floor drain sump monitoring system and primary containment atmospheric particulate monitoring system on a 31 day frequency to ensure the primary containment atmospheric particulate alarm is functioning and the flow channel, including the integrator of the drywell floor drain sump monitoring system, is functioning properly. | SR 3.4.5.2 | N/A |
| M.2 | Adds a new requirement to CTS 3.6.G Action 1 which will require an analysis of a primary containment atmosphere grab sample once every 12 hours (ITS 3.4.5 Required Action B.1). This added requirement provides information which helps to detect LEAKAGE. | 3.4.5 Required Action B.1 | N/A |
| | | | |
| 3.4.6, RCS Specific Activity | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| 3.4.7, RHR Shutdown Cooling System - Hot Shutdown | | | |
| M.1 | Adds proposed SR 3.4.7.1 to require the verification that each RHR shutdown cooling subsystem is OPERABLE consistent with the requirements of the LCO. | SR 3.4.7.1 | N/A |
| | | | |
| 3.4.8, RHR Shutdown Cooling System - Cold Shutdown | | | |
| M.1 | Adds a requirement to verify the alternate method to be in operation in lieu of the CTS requirement to verify the alternate method be capable of circulating reactor coolant. | 3.4.8 <i>Required Action A.2</i> | 4.6.P |
| | | | |
| 3.4.9, RCS Pressure and Temperature (P/T) Limits | | | |
| M.1 | Adds the requirement for an engineering evaluation to be performed to ensure the RCS is acceptable for continued operation. | 3.4.9 ACTIONS A, B and C | N/A |

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM**

| | | | |
|--|--|-------------|---------------------------|
| M.2 | Deletes the CTS 3.6.D footnote a allowance that the differential temperature between the reactor pressure vessel steam space coolant and the bottom head drain line coolant is not applicable below 25 psig reactor pressure. | N/A | 3.6.D footnote a |
| | | | |
| 3.4.10, Reactor Steam Dome Pressure | | | |
| M.1 | Deletes footnote that states that the reactor steam dome pressure limit is not applicable during anticipated transients. | N/A | 3.6.L footnote (a) |
| | | | |
| Current Specification 3/4.6.N, Structural Integrity | | | |
| NONE | NONE | NONE | NONE |
| | | | |

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|------------------------------|--|---|------------------------------------|
| 3.5.1, ECCS-Operating | | | |
| M.1 | Revises CTS 3.5.A.2, which requires the low pressure coolant injection (LPCI) subsystem to be OPERABLE and comprised of four OPERABLE LPCI pumps and an OPERABLE flow path capable of taking suction from the suppression chamber and transferring the water to the reactor vessel, to require each ECCS injection subsystem to be OPERABLE. The Bases describes the OPERABILITY requirements for LPCI. There are two LPCI subsystems, each consisting of two motor driven pumps, piping and valves capable of transferring water from the suppression pool to the RPV via the "selected" recirculation loop. Since the CTS only requires that LPCI be able to transfer water to the reactor vessel this change is considered more restrictive on plant operation, however necessary to ensure assumptions of the design basis accidents can be satisfied. In addition, 1) revises the allowance in CTS 3.5.A Action 2.b which allows the entire LPCI System to be inoperable for 7 days to allow only one LPCI subsystem to be inoperable (first part of ITS 3.5.1, Condition B) or one LPCI pump in each LPCI subsystem (second part of ITS 3.5.1 Condition C) to be inoperable; and 2) adds a new Action (ITS 3.5.1 Action D) which allows the entire LPCI System to be inoperable (i.e., both LPCI subsystems inoperable), however the Completion Time associated with this ACTION has been reduced to 72 hours. | 3.5.1, 3.5.1 Conditions B and C, 3.5.1 Action D | 3.5.A.2, 3.5.A Action 2.b |
| M.2 | Adds 1) ITS SR 3.5.1.3 requiring the verification of correct breaker alignment to the LPCI swing bus every 31 days; 2) ITS SR 3.5.1.4 requiring the verification that each recirculation pump discharge valve cycles through one complete cycle of full travel or is de-energized in the closed position; 3) ITS SR 3.5.1.11 requiring alternate verification of the automatic transfer capability of the LPCI swing bus power supply from its normal power source to its backup power source. | SR 3.5.1.3, SR 3.5.1.4, SR 3.5.1.11 | N/A |
| M.3 | Revises CTS 3.5.A Action 1.b requiring a normal plant shutdown with both CS subsystems inoperable and CTS 3.5.A Action 2.c requiring a normal plant shutdown with the LPCI subsystem and one or both CS subsystems inoperable to requiring entry into LCO 3.0.3. | 3.5.1 ACTION J | 3.5.A Action 1.b, 3.5.A Action 2.c |
| 3.5.2, ECCS-Shutdown | | | |

(Spec. CC
no
prior. CC)

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM

2

| | | | |
|--------------------|--|----------------|---|
| M.1 | Revises CTS 4.5.B to require explicit values of flow (4500 gpm) and system head corresponding to reactor pressure (20 psig). | SR 3.5.2.4 | 4.5.B |
| M.2 | Deletes the allowance to not require the suppression pool to be OPERABLE during cavity flooding. | N/A | 3.5.C.2 footnote (a), 3.5.C Action 2 footnote (a) |
| A.3 | Enhances presentation by requiring actions to be immediately initiated to restore secondary containment boundary (completing the actions as soon as possible) in lieu of current requirement to establish within 8 hours (initiating the actions as soon as possible). | 3.5.2 ACTION D | 3.5.B Action 2 / 3.5.C Action 2 |
| 3.5.3, RCIC System | | | |
| NONE | NONE | NONE | NONE |
| | | | |

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**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|--|---|---|------------------------------------|
| 3.6.1.1, Primary Containment | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| 3.6.1.2, Primary Containment Air Lock | | | |
| M.1 | Adds a Required Action to verify an OPERABLE door is closed in the air lock within 1 hour when the primary containment air lock interlock mechanism is inoperable. The 1 hour is allowed to complete the verification since the level of degradation associated with the CTS Actions is no worse than that allowed for when Primary Containment Integrity (CTS 3.7.A) is not maintained. | 3.6.1.2 Required Action B.1 | N/A |
| M.2 | CTS 3.7.C Action 2 (for an inoperable primary containment air lock interlock mechanism) does not include a default Action (be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours) consistent with other Actions in CTS 3.7.C. Therefore, for an inoperable primary containment air lock interlock mechanism, CTS LCO 3.0.C must be entered and the plant must be in MODE 3 in 13 hours and MODE 4 in 37 hours. ITS 3.6.1.2 ACTION D is proposed to be added as the default action which will require the plant to be in MODE 3 in 12 hours and MODE 4 in 36 hours. Since this change will require the plant to be in MODE 3 and 4 in less time (i.e., 1 hour), this change is considered more restrictive on plant operation. | 3.6.1.2 Action D | 3.0.C 3.7.C Action 2 |
| L.2 | In reference to the CTS action to immediately maintain an air lock door closed, changes the word "maintain" to "verify" and 1 hour is allowed to complete the verification in the ITS. The CTS does not specify a time limit to verify closure. | 3.6.1.2 Required Actions A.1 and C.2 | 3.7.C Actions 1.a and 3 |
| | | | |
| 3.6.1.3, Primary Containment Isolation Valves | | | |

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**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS**

| | | | |
|---|---|---|------|
| M.1 | Adds a new Applicability of "when associated instrumentation is required to be OPERABLE per LCO 3.3.6.1, "Primary Containment Isolation Instrumentation"," which effectively adds a MODE 4 and 5 requirement to the RHR Shutdown Cooling System isolation valves. Appropriate ACTIONS have been added for when the valves cannot be isolated or restored within the current 4 hour limit. | 3.6.1.3 Applicability, 3.6.1.3 ACTION F | N/A |
| M.2 | Adds a new Surveillance Requirement that verifies the 18 inch vent and purge valves, except the torus purge valves, are closed every 31 days except during operations which require them to be open (inerting, de-inerting, pressure control, ALARA or air quality considerations for personnel entry, and Surveillances that require the valves to be open). | SR 3.6.1.3.1 | N/A |
| | | | |
| 3.6.1.4, Drywell Pressure | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| 3.6.1.5, Drywell Air Temperature | | | |
| M.1 | Adds a new Specification requiring drywell average air temperature to be $\leq 150^{\circ}\text{F}$ during operations in MODES 1, 2, and 3, since the accident analyses of UFSAR, Section 6.2 assumes this temperature as an initial condition in the containment analysis. Appropriate ACTIONS and a Surveillance Requirement are also added. | 3.6.1.5, 3.6.1.5 ACTIONS A and B, SR 3.6.1.5.1 | N/A |
| | | | |
| 3.6.1.6, Low Set Relief Valves | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| 3.6.1.7, Reactor Building-to-Suppression Chamber Vacuum Breakers | | | |

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
· SECTION 3.6 - CONTAINMENT SYSTEMS**

| | | | |
|--|---|-------------------------------|---|
| M.1 | Reduces the time to verify that at least one vacuum breaker in the line is closed if it is determined that one vacuum breaker is not closed (otherwise inoperable) from 2 hours to 1 hour, consistent with the Primary Containment Specification, ITS 3.6.1.1. | 3.6.1.7 ACTION B | 3.7.F Action 2 |
| | | | |
| 3.6.1.8, Suppression Chamber-to-Drywell Vacuum Breakers | | | |
| M.1 | CTS 3.7.E Action 1 allows "one or more" of the required suppression chamber-to-drywell vacuum breakers to be inoperable for opening. However, the current accident analysis does not allow two or more vacuum breakers to be inoperable. When more than one vacuum breaker is inoperable, CTS LCO 3.0.C must be entered. Therefore, ITS 3.6.1.8 ACTION A ensures that only one vacuum breaker can be inoperable for opening, and if more than one is inoperable for opening, ITS LCO 3.0.3 will continue to be entered. | 3.6.1.8 ACTION A | 3.7.E Action 1 |
| | | | |
| 3.6.2.1, Suppression Pool Average Temperature | | | |
| M.1 <i>150</i> | CTS allows the suppression pool temperature to be increased to 120°F with the main steam isolation valves (MSIVs) closed following a scram. The ITS, which requires reactor vessel depressurization to < 200 psig when pool temperature exceeds 120°F, does not depend upon if the MSIVs are open or closed. In addition, the CTS 4.7.K.2.c requirement that the 30 minute temperature verification after a scram is required only with the main steam line isolation valves closed has been deleted, since the temperature verification, (as modified by DOC L.2 of ITS 3.6.2.1) is now required at all times following a scram. | 3.6.2.1 ACTION E | 3.7.K.2.c, 4.7.K.2.c |
| M.2 | The CTS Applicability for the 110°F limit is MODES 1, 2, and 3 with THERMAL POWER ≤ 1% RTP. The CTS Applicability for the 120°F limit is MODES 1, 2, and 3. However, the current Actions for when temperature exceeds 110°F require scrambling the reactor, and for when temperature exceeds 120°F only requires a depressurization to < 150 psig, both of which are still MODE 3. In the ITS, when temperature exceeds 110°F or 120°F, the unit must also be placed in MODE 4 within 36 hours. | 3.6.2.1 ACTIONS D and E | 3.7.K.2.b, 3.7.K.2.c, 3.7.K Actions 4 and 5 |
| | | | |
| 3.6.2.2, Suppression Pool Water Level | | | |

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

| NONE | NONE | NONE | NONE |
|---|---|-----------------------|------------------------------|
| 3.6.2.3, RHR Suppression Pool Cooling | | | |
| M.1 | Adds a specific value for verification of the required RHR pump flow when in the suppression pool cooling mode, which ensures primary containment peak pressure and temperature can be maintained below the design limits during a DBA. | SR 3.6.2.3.2 | 4.7.M.2 |
| A.2 | Deletes CTS 3.7.M Action 2, footnote (a), which allows the unit to maintain reactor coolant temperature as low as practical, in lieu of attaining MODE 4, when two or more RHR SDC mode subsystems are inoperable and the unit is unable to attain MODE 4. ITS 3.6.2.3 ACTION C requires a shutdown to MODE 4 with no allowance to remain in MODE 3. | 3.6.2.3 ACTION C | 3.7.M Action 2, footnote (a) |
| 3.6.2.4, RHR Suppression Pool Spray | | | |
| M.1 | Adds a Surveillance Requirement that verifies each suppression pool spray nozzle is unobstructed every 3 years, which ensures that when a suppression pool spray subsystem is required per its design function that it will perform as designed. | SR 3.6.2.4.2 | N/A |
| A.2 | Deletes CTS 3.7.L Action 2, footnote (a), which allows the unit to maintain reactor coolant temperature as low as practical, in lieu of attaining MODE 4, when two or more RHR SDC mode subsystems are inoperable and the unit is unable to attain MODE 4. ITS 3.6.2.3 ACTION C requires a shutdown to MODE 4 with no allowance to remain in MODE 3. | 3.6.2.4 ACTION C | 3.7.L Action 2, footnote (a) |
| 3.6.2.5, Drywell-to-Suppression Chamber Differential Pressure | | | |
| M.1 | The Applicability for CTS 3.7.H ends 24 hours prior to reducing THERMAL POWER to $\leq 15\%$ RTP preliminary to a scheduled reactor shutdown. The Applicability for ITS 3.6.2.5 will end 24 hours prior to reducing THERMAL POWER to $< 15\%$ RTP prior to the next scheduled reactor shutdown. Thus, the Applicability for ITS 3.6.2.5 lasts slightly longer than the current Applicability (since $< 15\%$ RTP is reached slightly after $\leq 15\%$ RTP is reached). | 3.6.2.5 Applicability | 3.7.H Applicability |

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TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

| | | | |
|---|--|-------------------|-----------------------------|
| | | | |
| 3.6.3.1, Primary Containment Oxygen Concentration | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| 3.6.4.1, Secondary Containment | | | |
| M.1 | Requires both subsystems be tested in the course of 48 months, as represented by the Staggered Test Basis requirement of the 24 month Frequency. CTS requires that one subsystem be tested every 18 months; however, the same SGT subsystem could be tested at each testing occurrence. | SR 3.6.4.1.3 | 4.7.N.3 |
| M.1 2 | Adds a Surveillance that requires verifying secondary containment equipment and blowout hatches are closed and sealed every 24 months. | SR 3.6.4.1.3 4 | 4.7.N.2.5 N/A |
| | | | |
| 3.6.4.2, Secondary Containment Isolation Valves | | | |
| M.1 | Adds a Surveillance that requires the isolation time of each power operated, automatic SCIV to be verified within limits, which provides assurance that the secondary containment isolation valves will function and the secondary containment will perform as assumed in the safety analyses. | SR 3.6.4.2.2 | N/A |

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**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS**

| | | | |
|-----|---|-------------------------------------|------------------|
| M.2 | <p>CTS 4.7.N.2.b requires all secondary containment penetrations not capable of being closed by OPERABLE secondary containment automatic isolation dampers and required to be closed during accident conditions to be closed. This can be met by a single manual valve being closed. CTS 3.7.O requires each secondary containment ventilation system automatic isolation damper to be OPERABLE. CTS 3/4.7.O does not prescribe limitations on manual valves. ITS LCO 3.6.4.2 requires each SCIV to be OPERABLE and proposed SR 3.6.4.2.1 requires the verification that each secondary containment isolation manual valve and blind flange that is not locked sealed or otherwise secured and is required to be closed during an accident is closed. This provides assurance that the position of all secondary containment isolation valves and blind flanges are properly controlled to ensure design basis assumptions are met.</p> | <p>LCO 3.6.4.2 SR 3.6.4.2.1</p> | <p>4.7.N.2.b</p> |
| | | | |

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

| 3.6.4.3, Standby Gas Treatment System | | | |
|---------------------------------------|------|------|------|
| NONE | NONE | NONE | NONE |
| | | | |

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|--|---|------------------------------|-----------------------|
| 3.7.1, Residual Heat Removal Service Water System | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| 3.7.2, Diesel Generator Cooling Water System | | | |
| M.1 | Changes the Applicability from "When the diesel generator is required to be OPERABLE" to "MODES 1, 2, and 3," since the DGCW also provides cooling water to the ECCS room emergency unit coolers. (The Applicability for MODES or conditions other than MODES 1, 2, and 3 is discussed in DOC LA.2 for ITS 3.7.2.). <u>Action B</u> has been added to cover the inoperabilities of DGCW subsystems with respect to capability of supporting ECCS room emergency coolers. The proposed Required Action is to align a DGCW subsystem to the ECCS room emergency cooler or declare the associated ECCS inoperable. In addition, since an opposite unit DG is required by ITS 3.8.1, the LCO statement (In conjunction with the new Applicability) has been modified to clearly require the opposite unit DGCW subsystem that provides cooling to the opposite unit DG. | LCO 3.7.2, 3.7.2 ACTION B | 3.8.B <u>3.9.A</u> |
| | | | |
| 3.7.3, Ultimate Heat Sink | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| 3.7.4, Control Room Emergency Ventilation System | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| 3.7.5, Control Room Emergency Ventilation Air Conditioning System | | | |
| NONE | NONE | NONE | NONE |

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS**

| | | | |
|--|---|-------------------|------------------|
| | | | |
| 3.7.6, Main Condenser Offgas | | | |
| M.1 | Changes the amount of increase requiring verification that the release rate of the sum of noble gases measured prior to the holdup line is within limits following an increase from > 50% to include an increase equivalent to 50%. | SR 3.7.6.1 | 4.8.1.2.b |
| | | | |
| 3.7.7, Main Turbine Bypass System | | | |
| M.1 | Adds ITS 3.7.7, "Main Turbine Bypass System," which will require the Main Turbine Bypass System to be OPERABLE or an MCPR penalty to be applied, to help ensure the safety analyses assumptions of certain events are maintained by limiting the resulting MCPR if the event were to occur. | 3.7.7 | N/A |
| | | | |
| 3.7.8, Spent Fuel Storage Pool Water Level | | | |
| M.1 | The CTS requires the spent fuel water level to be maintained at a level of ≥ 33 ft. The ITS requires the spent fuel storage pool water level to be ≥ 19 ft over the top of irradiated fuel assemblies seated in the spent fuel storage pool racks, which is approximately a 9 inch increase in the water level requirement. | 3.7.8 | 3.10.H |
| | | | |
| 3.7.9, Safe Shutdown Makeup Pump System | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| Current Specification 3/4.8.E, Flood Protection | | | |
| NONE | NONE | NONE | NONE |
| | | | |

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS**

| Current Specification 3/4.8.F, Snubbers | | | |
|--|------|------|------|
| NONE | NONE | NONE | NONE |
| | | | |
| Current Specification 3/4.8.G, Sealed Source Contamination | | | |
| NONE | NONE | NONE | NONE |
| | | | |

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|--------------------------------------|--|---|-------------|
| 3.8.1, AC Sources - Operating | | | |
| M.1 | <p>Adds two additional AC sources to the minimum requirements in CTS 3.9.A for AC Sources - Operating. The requirements were added to ensure the appropriate AC sources are OPERABLE during unit operation in MODES 1, 2, and 3 to satisfy the requirements of the UFSAR. The new requirements were added as LCO 3.8.1.c and LCO 3.8.1.d. LCO 3.8.1.c will require one qualified circuit between the offsite transmission network and the opposite unit's onsite Class 1E AC electrical power distribution subsystem(s) and LCO 3.8.1.d will require the opposite unit's DG, each capable of supporting the equipment required to be OPERABLE by LCO 3.6.4.3, "Standby Gas Treatment (SGT) System," LCO 3.7.4, "Control Room Emergency Ventilation (CREV) System" (Unit 2 only), and LCO 3.7.5, "Control Room Emergency Ventilation Air Conditioning (AC) System" (Unit 2 only). These added requirements are necessary since safety related equipment is shared between both units. Due to these additions, two notes have been added. The first Note has been added to the Applicability and allows the opposite unit's AC electrical power sources in LCO 3.8.1.c and d to not be required when the associated equipment is inoperable. The second Note has been added to the ACTIONS and excludes the applicability of LCO 3.0.4 for inoperable opposite unit AC electrical power sources. In addition, since the Specification has been prepared for both units consistent with CTS, two Notes have been added to the Surveillance Requirements (ITS Surveillance Requirements Notes 1 and 2) to clearly define the applicability of the Surveillances to both units. An additional Surveillance (SR 3.8.1.21) has also been added to ensure the opposite unit's power sources are properly tested.</p> | <p>LCO 3.8.1.c, LCO 3.8.1.d, 3.8.1 Applicability Note, 3.8.1 ACTIONS Note, Surveillance Requirements Notes 1 and 2, SR 3.8.1.21</p> | N/A |
| M.2 | <p>Adds two Required Actions to cover the situation when an offsite circuit is inoperable concurrent with a "redundant required feature." These Required Actions are similar to those required when a DG and a system, subsystem, train, component, or device are concurrently inoperable (CTS 3.9.A Action 4). Limiting these situations to 24 hours when one offsite circuit is inoperable (ITS 3.8.1 Required Action A.2) and 12 hours when both offsite circuits are inoperable (ITS 3.8.1 Required Action C.1) will ensure that the necessary equipment remains powered to meet the UFSAR.</p> | <p>3.8.1 Required Actions A.2 and C.1</p> | N/A |

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| | | | |
|------|---|--|---|
| M.3 | Adds a Note that requires SR 3.8.1.3 (the DG load Surveillance) to be immediately preceded by a successful performance of SR 3.8.1.2 (the DG start Surveillance), ensuring the DG load carrying capability is tested subsequent to a successful DG start test. | SR 3.8.1.3 Note 4 | N/A |
| M.4 | Adds limitations on the operating power factor for the 24-hour run. The actual power factor values have been added to the Bases. A Note has been also added to ensure a momentary transient that results in the power factor not being met does not invalidate the 24 hour run. | SR 3.8.1.15, including Notes 1 and 2 | 4.9.A.8.h |
| M.5 | Provides an upper steady state voltage limit of 4368V and a lower voltage limit (both steady state and initial startup) of 3952V. The proposed change conservatively reduces the DG allowable voltage limits from +/- 10% to +/- 5%. | SR 3.8.1.2, SR3.8.1.8, SR 3.8.1.10, SR 3.8.1.12, SR 3.8.1.13, SR 3.8.1.19 | 4.9.A.2.c, 4.9.A.7, 4.9.A.8.b, 4.9.A.8.d.2), 4.9.A.8.e, 4.9.A.8.f.2) |
| M.6 | Not used. | N/A | N/A |
| M.7 | Not used. | N/A | N/A |
| M.8 | Changes the CTS 4.9.A.8.h requirement for a slow restart of each DG after the diesel has been loaded for a period of time to a fast restart. The changed requirement will require the verification that each DG starts and achieves in ≤ 10 seconds, voltage ≥ 3952 and frequency ≥ 58.8 Hz; and steady state voltage of ≥ 3952 V and ≤ 4368 V and frequency ≥ 58.8 Hz and ≤ 61.2 Hz. | SR 3.8.1.16 | 4.9.A.8.h |
| M.9 | If CTS 4.9.A.8.h (the DG restart test portion) fails after the performance of the 24 hour DG load test, CTS 4.9.A.8.h footnote (f) allows the DG to be operated at "approximately" full load for 2 hours or until the operating temperature has stabilized. The ITS provides an explicit load limit of ≥ 2340 kW and specifies that the DG operate for ≥ 2 hours at this load. The load limit is 90% of the continuous rating of the DG, consistent with the minimum load proposed for the monthly DG test, and the 2 hour time limit at this load ensures operating temperatures are stabilized. In addition, due to the addition of an explicit load limit, an allowance has been provided to allow momentary transients below the 2340 kW load limit to not invalidate the 2 hour run requirement. | SR 3.8.1.16, including Note 1 | 4.9.A.8.h, including footnote (f) |
| M.10 | Requires the minimum voltage for the 10 year DG simultaneous start test to be 3952 V within 10 seconds; whereas the CTS does not provide a minimum voltage the DGs must attain within the 10 second DG start time assumed in the accident analysis. | SR 3.8.1.20 | 4.9.A.9 |

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**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| | | | |
|--|--|--|---------|
| | | | |
| 3.8.2, AC Sources - Shutdown | | | |
| M.1 | Specifies that the offsite circuit required to be OPERABLE during shutdown conditions must be available to supply power to all equipment required to be OPERABLE in the current plant condition. Since the ITS 3.8.2 circuit OPERABILITY requirements are proposed to require them capable of supplying power to necessary electrical power distribution subsystems, if one or more subsystems are not capable of being powered via an offsite circuit, that circuit is inoperable. The CTS is not specific as to what the required circuit must be powering. To ensure conservative actions, Required Action A.1, which requires the associated supported equipment to be declared inoperable, is also added. | LCO 3.8.2.a, 3.8.2 Required Action A.1 | 3.9.B.1 |
| M.2 | Requires the single unit DG required OPERABLE during shutdown conditions to be associated with one or more systems, subsystems, or components required to be OPERABLE. The CTS is not specific as to what Division that DG must be associated with. | LCO 3.8.2.b | 3.9.B.2 |
| M.3 | When a required offsite circuit or a unit DG is inoperable, the actions imposed by CTS 3.9.B Action 2 do not necessarily place the unit in a MODE or other specified condition in which CTS LCO 3.9.B is not applicable. Therefore, ITS 3.8.2 Required Actions A.2.4 and B.4 are being added, which implement a requirement to immediately initiate action to restore the required power sources to OPERABLE status. | 3.8.2 Required Actions A.2.4 and B.4 | N/A |
| | | | |
| 3.8.3, Diesel Fuel Oil and Starting Air | | | |
| NON E | NONE | NONE | NONE |
| | | | |
| 3.8.4, DC Sources - Operating | | | |

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| | | | |
|------------------------------|--|-----------------------------------|--------------------------------|
| M.1 | Deletes the CTS 4.9.C.6 allowance to replace or restore the battery to 100% or greater of manufacturer's rated capacity during the next refuel outage, for a battery that has shown signs of degradation or reached 85% service life and delivers a capacity of less than 100% of manufacturer's rated, in lieu of performing either a performance discharge test or a modified performance test to verify battery capacity every 12 months. | N/A | 4.9.C.6 |
| M.2 | Adds an additional DC source to the minimum requirements in CTS 3.9.C for DC Sources - Operating. The requirement was added to ensure the appropriate DC sources are OPERABLE during unit operation in MODES 1, 2, and 3 to satisfy the requirements of the UFSAR. The new requirement was added as LCO 3.8.4.c. LCO 3.8.4.c will require the opposite unit's 125 VDC electrical power subsystem capable of supporting the equipment required to be OPERABLE by LCO 3.6.4.3, "Standby Gas Treatment (SGT) System," LCO 3.7.4, "Control Room Emergency Ventilation (CREV) System" (Unit 2 only), LCO 3.7.5, "Control Room Emergency Ventilation Air Conditioning (AC) System" (Unit 2 only), and LCO 3.8.1, "AC Sources - Operating." This added requirement is necessary since safety related equipment is shared between both units. An Action (ITS 3.8.4 ACTION E) has been added, which requires the restoration of the opposite unit's electrical power subsystems to OPERABLE status within 7 days. | LCO 3.8.4.c, 3.8.4 ACTION E | N/A |
| M.3 | Deletes the CTS 4.9.C.2.b and 4.9.C.3.c provisions which allow the battery terminal and connector resistance to be $\leq 20\%$ above the baseline connection resistance, in lieu of demonstrating that the measured battery terminal and connector resistance is $\leq 150 \times 10^{-6}$ ohms. | N/A | 4.9.C.2.b, 4.9.C.3.c |
| 3.8.5, DC Sources - Shutdown | | | |
| M.1 | Not used. <i>Insert M.1</i> | <i>LCO 3.8.5</i> <i>N/A</i> | <i>LCO 3.9.D</i> <i>N/A</i> |
| M.2 | The CTS 3.9.D, "DC Sources — Shutdown" Action has been modified by a Note stating that LCO 3.0.3 is not applicable (ITS 3.8.5 ACTIONS Note). If moving irradiated fuel assemblies while in MODE 4 or 5, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. This clarification is necessary because defaulting to LCO 3.0.3 during irradiated fuel assembly movement in MODE 1, 2, or 3 would require the reactor to be shutdown, but would not require suspension of movement of irradiated fuel assemblies. | 3.8.5 ACTIONS Note | N/A |

Rev D

INSERT M.1 (LCO 3.8.5 Dresden/Quad)

The existing requirement of CTS 3.9.D for one 250 VDC and one 125 VDC electrical power sources to be OPERABLE during shutdown conditions is not specific as to what the sources must be powering. The requirement in ITS LCO 3.8.5 specifies that the sources must support an associated division of the onsite Class 1E DC Electrical Power Distribution System required by LCO 3.8.8, "Distribution Systems - Shutdown." This added restriction conservatively assures that at least the 250 VDC and one 125 VDC electrical power distribution subsystems have an OPERABLE DC source (battery and associated charger) supplying it with power, when required.

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

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| M.3 | In the event the necessary DC sources are not OPERABLE, ITS 3.8.5 Required Action A.2.4 is added to commence and continue attempts to restore the necessary DC sources, resulting in an action that does not allow continued operation in the existing plant conditions. This has the effect of not allowing MODE changes per ITS LCO 3.0.4 . | 3.8.5 Required Action A.2.4 | N/A |
| | | | |
| 3.8.6, Battery Cell Parameters | | | |
| M.1 | Adds a new requirement for when a Category A or B limit is not met requiring a check within 1 hour that the pilot cell electrolyte level and float voltage are within the Category C limits. | 3.8.6 Required Action A.1 | 3.9.C Actions 4 and 5 |
| M.2 | Deletes allowance to correct the Category B float voltage limit for average electrolyte temperature based on IEEE-450, 1987 recommendations. | N/A | Table 4.9.C-1 footnote (c) |
| M.3 | Imposes limitations that restrict the use of replacing specific gravity checks with charging current checks to 7 days when the battery is on float charge following a battery charge only. ITS also requires an actual specific gravity measurement at the end of the 7 day allowance. | Table 3.8.6-1 footnote (c) | Table 4.9.C-1 footnote (b) |
| M.4 | Changes the Float Voltage Allowable Value (Category C) from ≥ 2.07 volts for each connected cell to > 2.07 volts for each connected cell, consistent with the recommendation identified in IEEE-450-1995, Annex C, C.1 Note. | Table 3.8.6-1 Category C | Table 4.9.C-1 Category B Allowable Value |
| | | | |
| 3.8.7, Distribution Systems - Operating | | | |
| M.1 | Establishes a maximum time allowed for any combination of distribution subsystems listed in ITS LCO 3.8.7.a to be inoperable during any single contiguous occurrence of failing to meet the LCO; i.e., "16 hours from discovery of failure to meet LCO 3.8.7.a." CTS does not provide this restriction. | 3.8.7 ACTIONS A and B | N/A |
| M.2 | Adds an action that requires entry into ITS 3.0.3 if the loss of two or more electrical power distribution subsystems, in combination, results in a loss of safety function. CTS does not provide this restriction when the loss of safety function is the result of a combination of inoperable AC and DC subsystems. | 3.8.7 ACTION E | N/A |

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
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| | | | |
|--|--|--|----------------------------|
| M.3 | <p>Adds additional AC and DC distribution subsystems have been added to the minimum requirements in CTS 3.9.E for Distribution - Operating. The requirement was added to ensure the appropriate AC and DC distribution subsystems are OPERABLE during unit operation in MODES 1, 2, and 3 to satisfy the requirements of the UFSAR. The new requirements were added as LCO 3.8.7.b. LCO 3.8.7.b will require the opposite unit's AC and DC electrical power distribution subsystems capable of supporting the equipment required to be OPERABLE by LCO 3.6.4.3, "Standby Gas Treatment (SGT) System," LCO 3.7.4, "Control Room Emergency Ventilation (CREV) System" (Unit 2 only), LCO 3.7.5, "Control Room Emergency Ventilation Air Conditioning (AC) System" (Unit 2 only), and LCO 3.8.1, "AC Sources - Operating." These added requirements are necessary since safety related equipment is shared between both units. An Action (ITS 3.8.7 ACTION C) has been added, which requires the restoration of the opposite unit's required electrical power distribution subsystems to OPERABLE status within 7 days. In addition, ITS 3.8.7 ACTION C includes a Note to enter applicable Conditions and Required Actions of LCO 3.8.1 when Condition C results in the inoperability of a required offsite circuit.</p> | LCO 3.8.7.c, ACTION C ^b | N/A |
| | | | |
| 3.8.8, Distribution Systems - Shutdown | | | |
| M.1 <u>Open</u> | <p>Adopting TSTF-204 may result in changes to this M-DOC. ITS 3.8.8 specifies that the distribution systems necessary to supply AC and DC power to all equipment required to be OPERABLE in the current plant condition must be OPERABLE. This added restriction conservatively assures the needed sources of power are OPERABLE; even if this results in both the Division 1 and Division 2 distribution subsystems being required. The CTS 3.9.F Action has been modified to be "one or more required" instead of the current "less than," to account for this potential addition. In addition, Required Action A.1, which requires the associated supported equipment to be declared inoperable, is added to ensure the appropriate actions are taken based on the equipment made inoperable by the loss of the distribution subsystem.</p> | LCO 3.8.8, 3.8.8 Required Action A.1 | LCO 3.9.F, 3.9.F Action |

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| | | | |
|-----|--|--|-----|
| M.2 | The CTS 3.9.F, "Distribution — Shutdown" Action has been modified by a Note stating that LCO 3.0.3 is not applicable (ITS 3.8.8 ACTIONS Note). If moving irradiated fuel assemblies while in MODE 4 or 5, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. This clarification is necessary because defaulting to LCO 3.0.3 during irradiated fuel assembly movement in MODE 1, 2, or 3 would require the reactor to be shutdown, but would not require suspension of movement of irradiated fuel assemblies. | 3.8.8 ACTIONS Note | N/A |
| M.3 | In the event the necessary Division 1, or 2 electrical power distribution subsystems are not Operable, ITS 3.8.8 Required Action A.2.4 is added to commence and continue attempts to restore the necessary electrical power distribution subsystems, resulting in an action which does not allow continued operation in the existing plant condition. This has the effect of not allowing MODE changes per LCO 3.0.4. ITS 3.8.8 Required Action A.2.5 is also added for the Division 1 and 2 actions which assures the appropriate consideration is applied for shutdown cooling systems that are without required power, since additional actions not provided in the ITS 3.8.8 ACTIONS are required when shutdown cooling is inoperable. | 3.8.8 Required Actions A.2.4 and A.2.5 | N/A |
| | | | |

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|---|--|---|--------------------------|
| 3.9.1, Refueling Equipment Interlocks | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| 3.9.2, Refuel Position One-Rod-Out Interlock | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| 3.9.3, Control Rod Position | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| 3.9.4, Control Rod Position Indication | | | |
| M.1 | Changes the Applicability to MODE 5, regardless of whether or not a control rod is withdrawn. CTS 3.3.1 Action 3 for inoperable control rod position indication in MODE 5 only requires movement of the control rod to a position where it has an OPERABLE position indicator or to insert the control rod. The ITS ACTIONS require that fuel movement and control rod withdrawal be suspended and all insertable control rods in core cells containing fuel assemblies be fully inserted, or alternatively, that the control rod be fully inserted and disarmed. Also, a Completion Time has been added to specify that the Required Action be completed "immediately." | 3.9.4, 3.9.4 ACTION A | 3.3.1, 3.3.1 Action 3 |
| | | | |
| 3.9.5, Control Rod OPERABILITY - Refueling | | | |
| M.1 | Adds a new requirement and associated ACTION and Surveillance Requirement for control rod OPERABILITY during refueling, i.e., each withdrawn control rod must be capable of insertion (by scram). | 3.9.5, 3.9.5 ACTION A, SR 3.9.5.1 | N/A |

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|--|---|------------------------------------|-------------|
| 3.9.6, RPV Water Level - Irradiated Fuel | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| 3.9.7, RPV Water Level - New Fuel or Control Rods | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| 3.9.8, Residual Heat Removal - High Water Level | | | |
| M.1 | Adds two new Required Actions to the CTS 3.10.K Action when the required RHR shutdown cooling mode loop is inoperable. ITS 3.9.8 Required Action A.2 will require verification of reactor coolant circulation by an alternate method within 1 hour and once per 12 hours thereafter. In addition, ITS 3.9.8 Required Action A.3 will require the reactor coolant temperature to be monitored once per hour. These Required Actions will provide assurance that, in this condition, the alternate method of decay heat removal is functioning to maintain or reduce reactor coolant temperature. | 3.9.8 Required Action A.2 and A.3 | N/A |
| | | | |
| 3.9.9, Residual Heat Removal - Low Water Level | | | |
| M.1 | Adds two new Required Actions to the CTS 3.10.L Action when the two RHR shutdown cooling mode loops are inoperable. ITS 3.9.9 Required Action A.2 will require verification of reactor coolant circulation by an alternate method within 1 hour and once per 12 hours thereafter. In addition, ITS 3.9.9 Required Action A.3 will require the reactor coolant temperature to be monitored once per hour. These Required Actions will provide assurance that, in this condition, the alternate method of decay heat removal is functioning to maintain or reduce reactor coolant temperature. | 3.9.9 Required Actions A.2 and A.3 | N/A |

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|--|---|----------------|-------------|
| M.2 | Requires the following actions to be immediately initiated if an alternate method of decay heat removal is not verified: 1) restore secondary containment to OPERABLE status ; 2) restore one SGT subsystem to OPERABLE status; and 3) restore isolation capability in each required secondary containment penetration flowpath not isolated. These requirements will ensure the secondary containment boundary is intact to filter any release in the unlikely case the loss of shutdown cooling results in a release of fission products. | 3.9.9 ACTION B | N/A |
| M.3 | Revises the Surveillance Requirement to match the requirements of the LCO. SR 3.9.9.2 requires the verification that each required RHR shutdown cooling subsystem is OPERABLE. CTS 3.10.L (LCO 3.9.9) requires the OPERABILITY of both RHR shutdown cooling subsystems. However, CTS 4.10.L does not explicitly require a verification of the OPERABILITY of both RHR shutdown cooling subsystems. | SR 3.9.9.2 | 3/4.10.L |
| | | | |
| Current Specification 3/4.10.E, Communications | | | |
| NONE | NONE | NONE | NONE |
| | | | |

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|--|---|---|-------------|
| 3.10.1, Reactor Mode Switch Interlock Testing | | | |
| M.1 | Adds an appropriate ACTION to identify the Required Actions and Completion Times for noncompliance with Special Operations ITS 3.10.1. Also, Surveillance Requirements are added to provide increased assurance of continued compliance with Special Operations ITS 3.10.1. | 3.10.1 ACTION A, SR 3.10.1.1, SR 3.10.1.2 | N/A |
| | | | |
| 3.10.2, Single Control Rod Withdrawal - Hot Shutdown | | | |
| M.1 | Adds additional restrictions to ensure 1) an OPERABLE RPS SDV trip and an OPERABLE control rod, or to appropriately preclude the possibility of a local reactivity excursion; 2) the IRM, Reactor Mode Switch Shutdown Position, and Manual Scram RPS Functions of ITS 3.3.1.1; 3) the control rod position indication must be OPERABLE to support the one-rod-out interlock; and 4) all other control rods must be fully inserted. Furthermore, an ACTION and Surveillance Requirements are also provided in the proposed presentation for these allowances. | LCO 3.10.2 Item b, LCO 3.10.2 Item c, LCO 3.10.2 Item d.1, LCO 3.10.2 Item d.2, | N/A |
| | | | |
| 3.10.3, Single Control Rod Withdrawal - Cold Shutdown | | | |
| M.1 | If CTS 3.10.1 is not met and the withdrawn control rod is insertable, two additional Required Actions are provided in ITS 3.10.3 ACTION A. ITS 3.10.3 Required Action A.2.1 requires action to be initiated immediately to fully insert all insertable control rods. ITS 3.10.3 Required Action A.2.2 requires the placing of the reactor mode switch to the Shutdown position, which will preclude withdrawal of any control rod. If CTS 3.10.1 is not met and the withdrawn control rod is not insertable, an additional Required Action, ITS 3.10.3 Required Action B.2.1, will require action to be initiated immediately to fully insert all control rods. | 3.10.3 Required Actions A.2.1, A.2.2, and B.2.1 | 3.10.1 |
| M.2 | CTS provides an allowance to withdraw a single control rod while in MODE 4 provided the one-rod-out interlock is OPERABLE; however, the ITS applies an additional restriction to ensure the control rod position indication is OPERABLE (required to support the one-rod-out interlock). | LCO 3.10.3.b.1 | N/A |

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|---|---|---|-------------|
| | | | |
| 3.10.4, Single Control Rod Drive Removal - Refueling | | | |
| M.1 | Inputs to the one-rod-out interlock (rod position on the rod to be removed) must be overridden to remove the rod; thus, the one-rod-out interlock is not OPERABLE in this condition. To ensure only one rod is withdrawn, a new requirement that a control rod block is inserted has been added. This compensates for the inoperable one-rod-out interlock. To ensure no fuel is loaded (since refueling interlocks would preclude fuel movement with a withdrawn control rod), a new requirement that no other CORE ALTERATIONS can be in progress has been added. Surveillances have been added to verify a control rod withdrawal block is inserted every 24 hours and no other CORE ALTERATIONS are in progress every 24 hours. | LCO 3.10.4.c, LCO 3.10.4.d, SR 3.10.4.3, SR 3.10.4.5 | N/A |
| | | | |
| 3.10.5, Multiple Control Rod Withdrawal - Refueling | | | |
| M.1 | Adds a restriction on fuel assembly movement within the reactor pressure vessel with control rods withdrawn that only allows fuel to be loaded in an approved spiral reload sequence. An Action is provided to suspend fuel loading when the LCO is not met. In addition, adds a new Surveillance Requirement to verify, every 24 hours, fuel assemblies being loaded are in compliance with an approved spiral reload sequence. | LCO 3.10.5.c, 3.10.5 Required Action A.2, SR 3.10.5.3 | N/A |
| | | | |
| 3.10.6, Control Rod Testing - Operating | | | |
| NON E | NONE | NONE | NONE |
| | | | |
| 3.10.7, SDM Test - Refueling | | | |

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|---|---|------------------------------|--------------------------|
| M.1 | Adds a requirement to ensure adequate CRD charging water pressure is available. Also, adds an appropriate Surveillance Requirement. | LCO 3.10.7.f, SR 3.10.7.6 | N/A |
| M.2 | Revises the requirements of CTS 3.1.A Actions 1 and 2 to require the SDM test to be immediately suspended by placing the reactor mode switch in shutdown or refueling when required APRMs are inoperable. | 3.10.7 ACTION B | 3.1.A Actions 1 and 2 |
| | | | |
| Current Specification 3/4.12.A, Primary Containment Integrity | | | |
| M.1 | Deletes Specification that provides an exception, during low power PHYSICS TESTS, to the requirement for maintaining Primary Containment Integrity. | N/A | 3/4.12.A |
| | | | |

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
CHAPTER 4.0 - DESIGN FEATURES

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|-------|---------|-------------|-------------|
| NONE | NONE | NONE | NONE |
| | | | |

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

except during his absence, and then a designated licensed individual

| DOC # | SUMMARY | ITS SECTION | CTS SECTION |
|-------|---|------------------------------|-------------|
| | <i>unit supervisor</i> 5.1, Responsibility | | |
| M.1 | Adds a new requirement that a Senior Reactor Operator (SRO) be responsible for control room command and control function while either unit is in MODES 1, 2 or 3 and an individual with an active SRO or Reactor Operator license be responsible for the control room command function while both units are in MODES 4 or 5 or defueled. | 5.1.2 | NONE |
| | | | |
| | 5.2, Organization | | |
| M.1 | Adds a requirement that at least one required non-licensed operator be assigned to each unit. | 5.2.2.a | 6.2.B.1 |
| | | | |
| | 5.3, Unit Staff Qualifications | | |
| NONE | NONE | NONE | NONE |
| | | | |
| | 5.4, Procedures | | |
| M.1 | Adds requirement that all programs specified in Specification 5.5 have written procedures. | 5.4.1.d | N/A |
| | | | |
| | 5.5, Programs and Manuals | | |
| M.1 | Modifies the requirement to include Reactor Water Cleanup (RWCU) in the systems addressed by the Reactor Coolant Sources Outside Primary Containment Program. | 5.5.2 | 6.8.D.1 |
| M.2 | Adds four new programs, the Component Cyclic or Transient Limit, the Storage Tank Radioactive Monitoring Program, the Technical Specification (TS) Bases Control Program and the Safety Function Determination Program (SFDP). | 5.5.5, 5.5.8, 5.5.10, 5.5.11 | N/A |

Rev D

prior to

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

| | | | |
|---|--|-----------------------|---------------------------------------|
| M.3 | Adds new requirements to: 1) verify the new fuel oil flash point is within the requirements of the applicable ASTM standard; 2) verify, within 31 days of adding new fuel to the storage tanks, that kinematic viscosity is within limits; and 3) verify, within 31 days of adding new fuel to the storage tanks, that properties other than those specifically addressed are within limits of <u>ASTM</u> fuel . | 5.5.9.a.2, 5.5.9.b | 4.9.A.5.b, 4.9.A.5.c |
| | <i>Delete this line</i> | | |
| M.4 | Not Used. | N/A | N/A |
| | <i>Delete this line</i> | | |
| M.5 | Deletes an exemption from the particulate contamination testing requirements for the No.1 fuel oil. | N/A | 4.9.A.5.b, 4.9.A.6.b footnote h |
| | | | |
| 5.6, Reporting Requirements | | | |
| M.1 | Modifies the Drywell Radiation Monitor inoperability reporting requirements to require the report within 14 days, instead of 30 days, after the restoration time has expired. | 5.6.6 | Table 3.2.F-1, Action 61b |
| | | | |
| 5.7, High Radiation Area | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| Current Specification 6.4, Training | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| Current Specification 6.7, Safety Limit Violation | | | |

**TABLE M - MORE RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS**

| | | | |
|--|------|------|------|
| NONE | NONE | NONE | NONE |
| | | | |
| Current Specification 6.11, Radiation Protection Program | | | |
| NONE | NONE | NONE | NONE |
| | | | |
| Current Specification 6.13, Process Control Program | | | |
| NONE | NONE | NONE | NONE |
| | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 1.0 - USE AND APPLICATION**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|-------|---|--|-------------|-------------|
| L.1 | Combines analog and bistable channel requirements in the CHANNEL FUNCTIONAL TEST definition resulting in an allowance for the bistable channel test signal to be injected "as close to the sensor as practicable" in lieu of "into the sensor." | 1.1 CHANNEL FUNCTIONAL TEST definition | 1.0 | 3 |
| L.2 | CTS 1.0 states that the DOSE EQUIVALENT I-131 is calculated using the thyroid dose conversion factors found in Table III of TID 14844, "Calculation of Distance Factors for Power and Test Reactor Sites." The ITS allows DOSE EQUIVALENT I-131 to be calculated using any one of three thyroid dose conversion factors; TID-14844 (1962), Table E-7 of Regulatory Guide 1.109, Rev. 1 (1977), or Supplement 1 to ICRP-30 (1980). Using thyroid dose conversion factors other than those given in TID-14844 results in lower doses and higher allowable activity but is justified by the discussion given in the Federal Register (FR page 23360 VI 56 No 98 May 21, 1991). | 1.1 DOSE EQUIVALENT I-131 definition | 1.0 | 3 |
| | | | | |

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 2.0 - SAFETY LIMITS

to greater than the top of active irradiated fuel

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|-------|---|---------------------------|-------------|-------------|
| L.1 | <i>Changes</i> Deletes the requirement to maintain the reactor vessel water level greater than or equal to 12 inches above the top of active <i>irradiated</i> fuel during operations in MODES 3, 4, and 5. | N/A 2.1.1.3 | 2.1.D | 1 |
| L.2 | Deletes directions for the methods of restoring reactor vessel water level (manually initiate the ECCS, after depressurizing the reactor vessel, if required) to allow operator flexibility in determining the best method to restore the reactor vessel water level. | N/A | 2.1.D | 4 |
| | | | | |

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

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|-------|---|-------------|-------------|-------------|
| L.1 | The statement "If a Completion Time requires periodic performance on a "once per..." basis, the above Frequency extension applies to each performance after the initial performance," was added to allow the 1.25 times the interval specified in the Frequency concept to apply to periodic Required Actions. | SR 3.0.2 | 4.0.B | 6 |
| L.2 | ITS SR 3.0.3 allows that, at the time it is discovered that the Surveillance has not been performed, the requirement to declare the equipment inoperable (LCO not met) may be delayed for up to 24 hours regardless as to whether the Completion Times of the Actions are 24 hours or less, as is currently allowed in CTS 4.0.C. The second and third paragraphs of ITS SR 3.0.3 are added to clearly state the actions to take if the Surveillance is not performed within the delay period or the Surveillance fails when performed. | SR 3.0.3 | 4.0.C | 3 |
| | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|------------------------------------|--|---------------------------|----------------|-------------|
| 3.1.1, SHUTDOWN MARGIN | | | | |
| L.1 | Revises the requirement to suspend CORE ALTERATIONS "except for control rod insertion and fuel assembly removal" to allow continuation of activities that have a potential to correct the problem and restore a margin of safety to an inadvertent or uncontrolled core criticality. | 3.1.1 ACTION E | 3.3.A Action 3 | 4 |
| L.2 | Modifies the requirement to insert all insertable control rods in MODE 5 to only require those control rods in core cells containing one or more fuel assemblies to be fully inserted, since with all fuel assemblies removed from a core cell, inserting the associated control rod has a negligible impact on core reactivity. | 3.1.1 Required Action E.2 | 3.3.A Action 3 | 4 |
| | | | | |
| 3.1.2, Reactivity Anomalies | | | | |
| L.1 | Revises the time allowed to restore the core reactivity difference to within limits (i.e., to "perform an analysis to determine and explain the cause of the reactivity difference") from 12 hours to 72 hours. | 3.1.2 ACTION A | 3.3.B Action | 6 |
| L.2 | Replaces the term "CORE ALTERATIONS" with "fuel movement within the reactor pressure vessel or control rod replacement," since the intent of this Surveillance is to verify the core reactivity after in-vessel operations which could have significantly altered the core reactivity. | SR 3.1.2.1 | 4.3.B.1 | 3 |
| L.3 | Revises the frequency "31 effective full power days" (approximately 625 MWD/T), with "1000 MWD/T during operations in MODE 1." | SR 3.1.2.1 | 4.3.B.X (2) | 3 |
| | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|---------------------------------------|---|-----------------------------------|---|-------------|
| 3.1.3, Control Rod OPERABILITY | | | | |
| L.1 | Revises the requirements for the local distribution of inoperable control rods by 1) adding a Note excluding its applicability above 10% power, 2) deleting actions for inoperable control rods whose position is in conformance with the analyzed rod position sequence (e.g., BPWS) constraints, even if the inoperable control rods are within two cells of each other, and 3) revising the Completion Time from 1 hour to 4 hours to correct the situation prior to commencing a required shutdown. | 3.1.3 ACTION D | 3.3.C Actions 1.a and 2.a | 4, 6 |
| L.2 | Revises the Completion Time from 1 hour to 2 hours to insert the control rod. | 3.1.3 Required Action A.2 | 3.3.C Action 1.a.2) | 6 |
| L.3 | Not Used. | N/A | N/A | N/A |
| L.4 | Revises the time to demonstrate SHUTDOWN MARGIN from 24 hours to 72 hours to provide a reasonable time to perform the analysis or test. | 3.1.3 Required Action A.4 | 3.3.C Action 1.c, 4.3.A.2 | 6 |
| L.5 | Revises the requirement to 1) extend the time allowed to 3 hours (ITS 3.1.3 Required Action C.1) to complete the Insertion of all inoperable non-stuck control rods, and 2) add an additional hour is provided to disarm the associated CRD (ITS 3.1.3 Required Action C.2), 1 hour beyond that allowed to insert in recognition of the potential for excessive haste required to complete this task. | 3.1.3 Required Action C.1 and C.2 | 3.3.C Action 2, 3.3.H Action1, 3.3.I Action 1 | 6 |
| L.6 | Deletes the CTS 3.3.D Action 2 requirement for additional scram time surveillance testing when three or more control rods exceed the maximum scram time is deleted. In addition, since the shutdown requirement ("with the provisions of the ACTION(s) above not met, be in at least HOT SHUTDOWN within 12 hours") could have only applied to CTS 3.3.D Action 2 (since a control rod can always be declared inoperable), this part of CTS 3.3.D Action 2 has also been deleted. | N/A | 3.3.D Action 2 | 5 |

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

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|--------------------------------|---|---|---------------------------------|-------------|
| L.7 | Deletes the coupling requirements during refueling (OPERATIONAL MODE 5) specified by CTS 3/4.3.H since only one control rod can be withdrawn from core cells containing fuel assemblies. | N/A | 3/4.3.H | 2 |
| L.8 | Allows 3 hours to re-establish coupling for an uncoupled control rod before the control rod must be fully inserted and disarmed. <u>Also, because of the limited time allowed to recouple, removes the restriction on the number of attempts.</u> | 3.1.3 Required Actions C.1 and C.2 | 3.3.H Action 1.b | 4 |
| L.9 | Deletes the CTS 3.3.H Actions 1.a and 1.a.2) requirements since they are not necessary for ensuring recoupling of the control rod. | N/A | 3.3.H Actions 1.a and 1.a.2) | 4 |
| L.10 | Deletes requirement to verify control rod coupling by observing any indicated response on nuclear instrumentation during withdrawal of a control rod. SR 3.1.3.5, which requires verification that a control rod does not go to the withdrawn overtravel position, provides adequate assurance that the control rods are coupled. | N/A | 3.3.H Action 1.a.1) | 3 |
| L.11 | Deletes the Surveillances requiring that the control rod position indication system be determined OPERABLE during the performance of the control rod movement tests, since the requirements for the control rod position indication system are adequately addressed by the requirements of ITS 3.1.3 and associated SRs. | N/A | 4.3.1.2 | 3 |
| 3.1.4, Control Rod Scram Times | | | | |
| L.1 | Changes requirement for control rod scram time testing of all control rods prior to exceeding 40% RTP following CORE ALTERATIONS to only requiring testing of affected control rods following any fuel movement within the affected core cell. | SR 3.1.4.4 | 4.3.D.1.a | 3 |

*NRC
CTS has
no
restrictions
on the
number
of attempts*

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|--|---|--|---------------------------------|-------------|
| 3.1.5, Control Rod Scram Accumulators | | | | |
| L.1 | Revises the requirement to declare a control rod with an inoperable accumulator "slow" when reactor pressure is sufficient in lieu of declaring the control rod inoperable. Additionally, with more than one accumulator inoperable, ITS 3.1.5 ACTIONS B and C provide actions similar to ITS 3.1.5 ACTION A, instead of the CTS 3.3.G Action 1.c requirement to declare the associated control rod inoperable immediately. | 3.1.5 Required Action A.1, ACTIONS B and C | 3.3.G Actions 1.a.2) and 1.c | 4 |
| L.2 | Revises the requirement to allow 20 minutes to ensure control rod accumulator charging water pressure is adequate to support maintaining the remaining accumulators OPERABLE. | 3.1.5 Required Action B.1 | 3.3.G Action 1.c.1) | 4, 6 |
| | | | | |
| 3.1.6, Rod Pattern Control | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.1.7, Standby Liquid Control System | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 to 24 months for the requirements ensuring that the SLC System is capable of injecting into the reactor pressure vessel by verifying a flow path and also by firing one of the explosive valves. | SR 3.1.7.8, SR 3.1.7.9 | 4.4.A.4.a, 4.4.A.4.c | 10 |
| | | | | |
| 3.1.8, SDV Vent and Drain Valves | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|--|--|-------------|-------------|-------------|
| LD.1 | Relaxation of Surveillance Frequency from 18 to 24 months for the requirements ensuring that the vent and drain valves close in ≤ 30 seconds after receipt of an actual or simulated scram signal; and open when the actual or simulated scram signal is reset. | SR 3.1.8.3 | 4.3.K.3 | 10 |
| | | | | |
| Current Specification 3/4.3.J, Control Rod Drive Housing Support | | | | |
| L.1 | Deletes the requirement for the Control Rod Drive Housing Support to be in place. | N/A | 3/4.3.J | 1 |
| | | | | |

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

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|---|---------|-------------|-------------|-------------|
| Current Specification 3/4.3.N, Economic Generation Control System | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

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

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|---|---|-------------|------------------------------|-------------|
| 3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE | | | | |
| L.1 | The requirement to verify APLHGR within limits within 12 hours after completion of a THERMAL POWER increase of at least 15% of RATED THERMAL POWER is relaxed to once within 12 hours after greater than or equal to 25% RTP. It <i>This change</i> addition allows the Applicability to be entered (i.e., $\geq 25\%$ RTP) prior to performing the Surveillance. <i>and therefore, the K.O.D allowance is not necessary and has been deleted</i> | SR 3.2.1.1 | 4.11.A.2, <i>4.11.A.4</i> | 3 |
| L.2 | Deletes requirement to verify APLHGRs be within the limits initially and every 12 hours when operating at a LIMITING CONTROL ROD PATTERN, since it is superfluous as it would not be evident that a LIMITING CONTROL ROD PATTERN has been achieved until the Surveillance is performed. | N/A | 4.11.A.3 | 3 |
| | | | | |
| 3.2.2, MINIMUM CRITICAL POWER RATIO | | | | |
| L.1 | The requirement to verify MCPR within limits within 12 hours after completion of a THERMAL POWER increase of at least 15% of RATED THERMAL POWER is relaxed to once within 12 hours after greater than or equal to 25% RTP. It <i>This change</i> addition allows the Applicability to be entered (i.e., $\geq 25\%$ RTP) prior to performing the Surveillance. <i>and therefore, the K.O.D allowance is not necessary and has been deleted</i> | SR 3.2.2.1 | 4.11.C.2, <i>4.11.C.4</i> | 3 |
| L.2 | Deletes requirement to verify MCPR be within the limits initially and every 12 hours when operating at a LIMITING CONTROL ROD PATTERN, since it is superfluous as it would not be evident that a LIMITING CONTROL ROD PATTERN has been achieved until the Surveillance is performed. | N/A | 4.11.C.3 | 3 |
| | | | | |
| 3.2.3, LINEAR HEAT GENERATION RATE | | | | |

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

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|-------------------------------|--|-------------|----------------------------------|-------------|
| L.1 | The requirement to verify LHGR within limits within 12 hours after completion of a THERMAL POWER increase of at least 15% of RATED THERMAL POWER is relaxed to once within 12 hours after greater than or equal to 25% RTP. <i>In addition, allows the Applicability to be entered (i.e., \geq 25% RTP) prior to performing the Surveillance.</i> <i>(This change and therefore, the K.O.D allowance is not necessary and has been deleted)</i> | SR 3.2.3.1 | 4.11.D.2, 4.11.D.4 | 3 |
| L.2 | Deletes requirement to verify LHGRs be within the limits initially and every 12 hours when operating at a LIMITING CONTROL ROD PATTERN, since it is superfluous as it would not be evident that a LIMITING CONTROL ROD PATTERN has been achieved until the Surveillance is performed. | N/A | 4.11.D.3 | 3 |
| 3.2.4, APRM GAIN AND SETPOINT | | | | |
| L.1 | Deletes CTS action requirement to (1) ensure that the adjusted APRM reading does not exceed 100% of RATED THERMAL POWER and (2) post a notice of adjustment on the reactor control panel whenever APRM gain is adjusted so that the APRM readings are greater than or equal to 100% times FRTP times FDLRC. | N/A | 3.11.B Action 3 and footnote (b) | 4 |
| L.2 | The requirement to verify FDLRC or MFLPD/FRTP is within limits within 12 hours after completion of a THERMAL POWER increase of at least 15% of RATED THERMAL POWER is relaxed to once within 12 hours after greater than or equal to 25% RTP. <i>In addition, allows the Applicability to be entered (i.e., \geq 25% RTP) prior to performing the Surveillance.</i> <i>(This change and therefore, the K.O.D allowance is not necessary and has been deleted)</i> | SR 3.2.4.1 | 4.11.B.2, 4.11.B.4 | 3 |

This change

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|-------------------------------------|---|--|---|-------------|
| 3.3.1.1, RPS Instrumentation | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the RPS LOGIC SYSTEM FUNCTIONAL TEST and the RPS RESPONSE TIME TEST. | SR 3.3.1.1.17, SR 3.3.1.1.18 | 4.1.A.2, 4.1.A.3 | 10 |
| LD.2 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL FUNCTIONAL TEST for the Reactor Mode Switch—Shutdown Position Function. | SR 3.3.1.1.15 | 4.1.A.1 for Table 4.1.A-1 Functional Unit 13 | 10 |
| LE.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION. | SR 3.3.1.1.16 for Table 3.3.1.1-1 Functions 1.a, 3, 4, 5, 7.b, 8, and 9 | 4.1.A.1 for Table 4.1.A-1 Functional Units 1.a, 3, 4, 5, 8.a, 9, and 11 | 10 |
| LF.1 | Revises the Current Technical Specifications (CTS) Trip Setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy") or NEDC-31336P-A, "General Electric Instrument Setpoint Methodology." | Table 3.3.1.1- 1 | Table 2.2.A-1 | 1 |
| L.1 | Adds an allowance to exclude neutron detectors from the RPS RESPONSE TIME TESTING due to the difficulties of simulating a meaningful signal. The principles of detector operation virtually ensure an instantaneous response time. | SR 3.3.1.1.18 Note 1 | N/A | 3 |

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

| | | | | |
|-----|--|---|---|------|
| L.2 | Deletes the IRM, APRM, Reactor Mode Switch Shutdown Position, and Manual Scram requirements for MODES 3 and 4 (APRM - MODE 3 only). During normal operation in MODES 3 and 4, all control rods are fully inserted and the Reactor Mode Switch Shutdown position control rod withdrawal block (ITS 3.3.2.1) does not allow any control rod to be withdrawn. | N/A | Tables 3.1.A-1 and 4.1.A-1 Functional Units 1, 2.a, 2.d, 13, and 14, Table 3.1.A-1 Actions 12, 17, and 18 | 1 |
| L.3 | CTS requirements for IRM Neutron Flux—High, IRM Inoperative, Reactor Mode Switch Shutdown Position, and Manual Scram to be OPERABLE in MODE 5 are replaced with ITS requirements for these Functions to be OPERABLE in MODE 5 when a control rod is withdrawn from a core cell containing one or more fuel assemblies. Conforming ITS ACTION H requirements are included for consistency with the proposed ITS Applicability. CTS Action 19 to lock the reactor mode switch in Shutdown is deleted. Once the control rods are inserted, the RPS Functions are no longer required to be OPERABLE, thus there is no need to place the reactor mode switch in Shutdown. | Table 3.3.1.1-1 Note (a), 3.3.1.1 ACTION H | Tables 3.1.A-1 and 4.1.A-1 Functional Units 1.a, 1.b, 13, and 14, Table 3.1.A-1 Actions 13 and 19 | 2, 8 |
| L.4 | The CTS Scram Discharge Volume Water Level Trip Function Applicability is modified from requiring the Function to be OPERABLE in MODE 5 with any control rod withdrawn to only requiring the Function to be OPERABLE in MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies. Conforming ITS ACTION H requirements are included for consistency with the proposed ITS Applicability. | Table 3.3.1.1-1 Functions 7.a and 7.b, including Note (a), 3.3.1.1 ACTION H | Table 3.1.A-1 Functional Units 8.a and 8.b, including footnotes (b) and (i), Table 4.1.A-1 Functional Units 8.a and 8.b, including footnotes (j) and (k), Table 3.1.A-1 Action 13 | 2 |

5

and 19

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | | |
|------|--|---|--|---|
| L.5 | The requirement in CTS Table 3.1.A-1 Actions 13 and 19 requiring the suspension of LPRM replacement if SRM instrumentation is not OPERABLE per CTS 3.10.B has been deleted since the ITS Required Actions are adequate to minimize the reactivity of the core whenever required Functions (IRMs, APRMs, Scram Discharge Volume Water Level, Reactor Mode Switch Shutdown Position, and Manual Scram) are inoperable concurrent with SRM inoperabilities. | N/A | Table 3.1.A-1 Actions 13 and 19 | 4 |
| L.6 | The CTS Table 3.1.A-1 Action 16 requirement to initiate a reduction in THERMAL POWER within 15 minutes has been deleted, since immediate power reduction may not always be the conservative method to assure safety. | N/A | Table 3.1.A-1 Action 16 | 4 |
| L.7 | ITS provides an exception to Operability requirements for performing specified APRM heat balance calibration until 12 hours after THERMAL POWER greater than or equal to 25% RTP. | SR 3.3.1.1.2 | Table 4.1.A-1 footnote (d) | 3 |
| L.8 | Relaxation of CHANNEL CALIBRATION Surveillance Frequency for the reactor recirculation flow portion of Functional Unit 2.b, APRM Flow Biased Neutron Flux—High from 184 days to 24 months. | SR 3.3.1.1.16 for Table 3.3.1.1-1 Function 2.b, SR 3.3.1.1.14 Note 3 | 4.1.A.1 for Table 4.1.A-1 Functional Unit 2.b | 3 |
| L.9 | Extends the time to reach < 45% RTP from 2 hours to 4 hours. | 3.3.1.1 Required Action E.1 | Table 3.1.A-1 Action 16 | 6 |
| L.10 | Deletes the response time for the Manual Scram, Reactor Mode Switch Shutdown Position, IRMs, APRM Neutron Flux Setdown, APRM inoperable and Scram Discharge Volume Water Level, since they are not assumed in any accident analysis. | N/A | 4.1.A.3 for Table 3.1.A-1 Functional Units 1.a, 1.b, 2.a, 2.d, 7.a, 7.b, 11, and 12 | 3 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | | |
|------------------------------|--|--|---|----|
| L.11 | Deletes the requirement to post a notification on the reactor control panel if any required APRM must be adjusted to be within 2% of RATED THERMAL POWER. | N/A | Table 4.1.A-1 footnote (d) | 4 |
| 3.3.1.2, SRM Instrumentation | | | | |
| LE.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the SRM CHANNEL CALIBRATION. | SR 3.3.1.2.7 | 4.2.G.4 | 10 |
| L.1 | CTS only specifies an action for one required SRM inoperable during MODE 2; therefore, a plant shutdown is required (per CTS 3.0.C) if two or more required SRMs become inoperable. The words "or more" are added (ITS 3.3.1.2 Condition A) to allow the action to apply to two or three inoperable SRMs (i.e., allow 4 hours to restore the inoperable SRMs). Additionally, with no OPERABLE SRMs, the ability to monitor positive reactivity changes is significantly restricted, thus a new Action is added in the ITS to ensure that no further control rod withdrawal is allowed. | 3.3.1.2 Condition A, 3.3.1.2 ACTION B | N/A | 5 |
| L.2 | Deletes the CTS requirement to "lock" the mode switch in Shutdown. | N/A | 3.2.G Action 2 | 8 |
| L.3 | Deletes the "prior to" frequency from CTS Surveillances involving prior to startup, withdrawing control rods, and performing CORE ALTERATIONS. These additional Surveillance Frequencies are redundant to CTS 3.0.A and CTS 4.0.D | SR 3.3.1.2.6, SR 3.3.1.2.5, SR 3.3.1.2.4 | 4.2.G.3.a, 4.10.B.2.a, 4.10.B.3.a | 3 |
| L.4 | The CTS requires verifying SRM count rate is at least 3 cps. The ITS allows SRM count rate to be below 3 cps with less than or equal to four fuel assemblies adjacent to the SRM provided no other fuel assemblies are located in the associated core quadrant. | SR 3.3.1.2.4 Note | 4.10.B.3 | 3 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | | |
|---|--|-----------------------------------|----------------------|---|
| L.5 | Revises the CTS Action to immediately "...insert all insertable control rods" to "initiate action to insert all insertable control rods...." During MODE 5, it may not be possible to immediately insert all insertable control rods; therefore the ITS provides a Required Action to immediately initiate action and continue attempts to insert all insertable control rods. | 3.3.1.2 Required Action E.2 | 3.10.B Action | 4 |
| L.6 | Modifies the requirement to fully insert all insertable control rods in MODE 5 if one or more required SRMs are inoperable to only require those control rods in core cell containing one or more fuel assemblies, since with all fuel assemblies removed from a core cell, inserting the associated control rod has a negligible impact on core reactivity. | 3.3.1.2 Required Action E.2 | 3.10.B Action | 4 |
| L.7 | Adds a Note that eliminates requirements for SRMs outside the fueled region to be Operable in MODE 5, during a spiral offload or reload, since monitors in these positions are not capable of monitoring normal changes in neutron flux. Similarly, SRM count rate requirements are deleted. | Table 3.3.1.2- 1 Note (b) | 4.10.B.1.c | 1 |
| L.8 | Modifies the SRM count rate requirement to allow count rate to be as low as 0.7 cps, provided the signal-to-noise ratio is $\geq 20:1$. The optional count rate of at least 0.7 cps with a signal to noise ratio $\geq 20:1$ is acceptable since the SRMs could still monitor neutron counts with the same confidence as in the current value. | SR 3.3.1.2.4 | 4.2.G.1, 4.10.B.3 | 3 |
| | | | | |
| 3.3.2.1, Control Rod Block Instrumentation | | | | |
| LF.1 | Revises the Current Technical Specifications (CTS) Trip Setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy") or NEDC-31336P-A, "General Electric Instrument Setpoint Methodology." | Table 3.3.2.1- 1 | Table 3.2.E-1 | 1 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | | |
|--|--|--|---|---------|
| L.1 | Deletes the requirement to perform the CHANNEL FUNCTIONAL TEST of the RBM "within 24 hours prior to startup," since the normal 92 day periodic Surveillance Frequency provides adequate assurance that the RBM Functions are Operable. | N/A | Table 4.2.E-1 Functional Unit 1 "S/U" and footnote (b) | 3 |
| L.2 | CTS requirements for RWM Channel Functional Testing are modified. ITS SRs extend the CHANNEL FUNCTIONAL TEST to 92 days. ITS Notes extend the time, for up to 1 hour, to perform the RWM CHANNEL FUNCTIONAL TEST after any control rod is withdrawn at $\leq 10\%$ RTP in MODE 2 and after THERMAL POWER is $\leq 10\%$ RTP in MODE 1. | SR 3.3.2.1.2 including Note, SR 3.3.2.1.3 including Note | 4.3.L.2, 4.3.L.3 | 3 |
| L.3 | Deletes CTS Action that requires verification that the reactor is not operating on a LIMITING CONTROL ROD PATTERN when one RBM channel is inoperable, and deletes the Surveillance Requirement that requires a CHANNEL FUNCTIONAL TEST prior to control rod withdrawal when the reactor is operating on a LIMITING CONTROL ROD PATTERN. | N/A | 3.3.M Action 1.a, 4.3.M.2 | 3, 4 |
| 3.3.2.2, Feedwater System and Main Turbine High Water Level Trip Instrumentation | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST. | SR 3.3.2.2.4 | 4.2.J.2 | 10 |
| LF.1 | Revises the Current Technical Specifications (CTS) Trip Setpoint to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy"). | SR 3.3.2.2.3 | Table 3.2.J-1 | 1 |
| L.1 | Modifies the Applicability for the Feedwater System and Main Turbine Water Level Trip Instrumentation from MODE 1 to when THERMAL POWER is $\geq 25\%$ RTP, and the current shutdown action to only require power to be reduced to $< 25\%$ RTP. In addition, the time to achieve this power level has been reduced from 8 hours to 4 hours. | 3.3.2.2 Applicability, 3.3.2.2 ACTION B | 3.2.J Applicability, Table 3.2.J-1 Action 90.b | 2, 5, 6 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | | |
|--|--|---|--|----|
| L.2 | CTS requires reduction in Thermal Power if the Feedwater System Main Turbine High Water Level Trip Instrumentation is not restored to Operable status. ITS adds a Required Action to allow removal of the associated feedwater pump(s) from service in lieu of reducing Thermal Power. This Required Action will only be used if the instrumentation is inoperable solely due to an inoperable feedwater pump breaker. | 3.3.2.2 Required Action B.1 | N/A | 5 |
| | | | | |
| 3.3.3.1, Post Accident Monitoring Instrumentation | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL FUNCTIONAL TEST portion of the CHANNEL CALIBRATION. | SR 3.3.3.1.3 | 4.2.F.1 for Table 4.2.F-1 Instrumentation 1, 2, 3, 4, 5, 6, and 12 | 10 |
| LE.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION. | SR 3.3.3.1.3 | 4.2.F.1 for Table 4.2.F-1 Instrumentation 1, 2, 3, 4, 5, 6, and 12 | 10 |
| L.1 | Adds a Note that LCO 3.0.4 is not applicable to the ITS 3.3.3.1 ACTIONS. | 3.3.3.1 ACTIONS Note 1 | N/A | 7 |
| L.2 | Adds a Note to allow a channel to be inoperable for up to 6 hours solely for performance of required Surveillances provided the other channel in the associated Function is OPERABLE. | 3.3.3.1 Surveillance Requirements Note 2 | N/A | 6 |
| L.3 | The CTS Actions for one channel inoperable in one or more Functions for more than the allowed outage time is revised from requiring a shutdown to requiring a Special Report. | 3.3.3.1 ACTION B | Table 3.2.F-1 Actions 60.a and 62.a | 5 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | | |
|-----------------------------------|---|--------------------------------------|---|------|
| L.4 | In the event the number of OPERABLE channels is less than the Minimum Channels OPERABLE requirement, the CTS requires the inoperable channels to be restored within 48 hours. The ITS extends this Completion Time to 7 days. | 3.3.3.1 ACTION C | Table 3.2.F-1 Action 60.b | 6 |
| L.5 | With one or two drywell area radiation monitors inoperable, the CTS requires initiation of the alternate method of monitoring within 72 hours and restoration of both channels to OPERABLE status within 7 days. With one monitor inoperable, the ITS provides 30 days for the restoration of the monitor prior to initiating actions in accordance with Specification 5.6.6 and with two monitors inoperable, provides 7 days for restoration of one monitor prior to initiating actions in accordance with Specification 5.6.6. | 3.3.3.1 ACTIONS A, B, C, D, and F | Table 3.2.F-1 Action 61 | 5, 6 |
| L.6 | Changes the Applicability requirement for Drywell Area Radiation Monitors from MODES 1, 2, and 3 to MODES 1 and 2. | 3.3.3.1 Applicability | Table 3.2.F-1 and 4.2.F-1 for Instrumentation 12 | 2 |
| 3.3.4.1, ATWS-RPT Instrumentation | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST. | SR 3.3.4.1.5 | 4.2.C.2 | 10 |
| LE.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION. | SR 3.3.4.1.4 | 4.2.C.1 for Table 4.2.C-1 Functional Units 1 and 2 | 10 |
| LF.1 | Revises the Current Technical Specifications (CTS) Trip Setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy"). | SR 3.3.4.1.4 | Table 3.2.C-1 | 1 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | | |
|--------------------------------------|--|-----------------------------------|--|------|
| L.1 | CTS require the unit to be in Mode 2 if the ATWS-RPT instrumentation is not restored. ITS will allow removal of the associated recirculation pump from service in lieu of being in MODE 2 within 6 hours. | 3.3.4.1 Required Action D.1 | N/A | 5 |
| L.2 | When two reactor vessel water level channels or two reactor vessel pressure channels in the same Trip System are inoperable, in place of the CTS requirement to restore the inoperable channels, the ITS provides an option to place inoperable channels in the tripped condition, conservatively compensating for the inoperable status, restoring the single failure capability and providing the required initiation capability of the instrumentation. | 3.3.4.1 ACTION A | 3.2.C Action 3 | 4 |
| L.3 | CTS requires that when one Trip System is inoperable, 72 hours are provided to restore the Trip System. CTS also requires that when both Trip Systems are inoperable, 1 hour is provided to restore one Trip System. The ITS addresses trip Function capability, not Trip System capability, providing a 72 hour Completion Time to restore trip capability when one Function has lost ATWS-RPT trip capability and a 1 hour Completion Time when both Functions have lost ATWS-RPT trip capability. A trip Function is maintained when sufficient channels are Operable or in trip, such that the ATWS- RPT System will generate a trip signal from the given Function on a valid signal and both recirculation pumps can be tripped. This requires two channels of the Function, in the same trip system, to each be Operable or in trip. ITS extends the time for repair to 14 days when either the pressure or level functions are inoperable in one trip system provided the other trip system retains trip capability. | 3.3.4.1 ACTIONS B and C | 3.2.C Actions 5 and 6 | 1, 6 |
| | | | | |
| 3.3.5.1, ECCS Instrumentation | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST and the CHANNEL FUNCTIONAL TEST for HPCI Manual Initiation and ADS Initiation Timer and Low Low Water Level Actuation Timer Functions. | SR 3.3.5.1.9 | 4.2.B.2, 4.2.B.1 for Table 4.2.B- 1 Functional Units 3.g, 4.c, and 4.d | 10 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | | |
|---|--|---------------------------|---|----|
| LE.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION. | SR 3.3.5.1.8 | 4.2.B.1 for Table 4.2.B-1 Functional Units 1.d, 2.d, 4.c, and 4.d | 10 |
| LF.1 | Revises the Current Technical Specifications (CTS) Trip Setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy"). | Table 3.3.5.1-1 | Table 3.2.B-1 | 1 |
| L.1 | CTS Table 3.2.B-1 Action 32, which applies to Functional Units 1.c and 2.c (Reactor Vessel Pressure-Low (Permissive) Functions) in MODES 4 and 5, requires the channels to be placed in the tripped condition within 24 hours. If this Action is not performed, CTS 3.2.B does not provide default actions, thus CTS 3.0.C appears to be applicable. However, CTS 3.0.C does not apply in MODES 4 and 5, therefore 10 CFR 50.35(c)(2) requires that the licensee notify the NRC if required by 10 CFR 50.72 and a Licensee Event Report (LER) be submitted to the NRC as required by 10 CFR 50.73. In the ITS an alternate action has been added to declare the associated supported subsystems inoperable. In this condition, the ITS will require the associated supported subsystems to be declared inoperable immediately. | 3.3.5.1 ACTION H 6 | Table 3.2.B-1 Action 32 for Functional Units 1.c and 2.c | 4 |
| | | | | |
| | | | | |
| 3.3.5.2, RCIC System Instrumentation | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST and the CHANNEL FUNCTIONAL TEST for RCIC Manual Initiation Function. | SR 3.3.5.2.6 | 4.2.D.2, 4.2.D.1 for Table 4.2.D-1 Functional Unit 5 | 10 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | | |
|---|--|------------------------------|--|----|
| LF.1 | Revises the Current Technical Specifications (CTS) Trip Setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy"). | Table 3.3.5.2-1 | Table 3.2.D-1 | 1 |
| 3.3.6.1, Primary Containment Isolation Instrumentation 5 | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST and the CHANNEL FUNCTIONAL TEST for MSL Tunnel Temperature—High, SLC System Initiation, RCIC Area Temperature—High, and HPCI Area Temperature—High Functions. | SR 3.3.6.1.5 SR 3.3.6.1.7 | 4.2.A.2, 4.2.A.1 for Table 4.2.A-1 Functional Units 3.e, 4.a, 5.c, and 6.c | 10 |
| LE.1 | Relaxation of Surveillance Frequency from 92 days and 18 months to 24 months for performing the CHANNEL CALIBRATION. | SR 3.3.6.1.6 | 4.2.A.1 for Table 4.2.A-1 Functional Units 1.a, 1.c, 3.a, 3.c, 3.d, 3.e, 4.b, 5.a, 5.c, 6.a, 6.b, 6.c, and 7.a | 10 |
| LF.1 | Revises the Current Technical Specifications (CTS) Trip Setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy"). | Table 3.3.6.1-1 | Table 3.2.A-1 | 1 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | | |
|--|---|--|---|------|
| L.1 | CTS Table 3.2.A-1 Action 23 requires the affected system isolation valves to be closed within one hour. If this action were not met entry into CTS 3.0.C is required and the plant must within one hour take action to place the unit in a MODE in which the Specification does not apply by placing the plant in MODE 3 in the next 12 hours, and be in at least MODE 4 within the subsequent 24 hours. In lieu of a CTS 3.0.C shutdown, the ITS provides a shutdown to MODE 4 within the Primary Containment Isolation Instrumentation Specification. | 3.3.6.1 ACTION G | CTS 3.0.C | 4 |
| L.2 | The Applicability of the SLC System Initiation Function has been modified from MODES 1, 2, and 3 to MODES 1 and 2, consistent with the SLC System requirements. In addition, the ITS allows the associated SLC subsystem to be declared inoperable in lieu of isolating the RWCU System, as required by the CTS when one or more channels of the SLC System Initiation Function are inoperable and not tripped. | Table 3.3.6.1-1 Function 5.a, 3.3.6.1 ACTION H | Tables 3.2.A-1 and 4.2.A-1 Functional Unit 4.a, Table 3.2.A-1 Action 23 | 2, 4 |
| L.3 | The CTS action, associated with the Reactor Vessel Water Level—Low Function, to close the affected system isolation valves within one hour and declare the affected system inoperable has been modified to immediately initiate action to restore channel to OPERABLE status or initiate action to isolate the Residual Heat Removal Shutdown Cooling System. | 3.3.6.1 ACTION I | Table 3.2.A-1 Action 23 | 5 |
| L.4 | CTS Table 3.2.A-1 Action 21, which requires the unit to be in STARTUP (Mode 2) with the associated isolation valves closed within 8 hours, is being changed to only require isolation of the associated main steam line within 12 hours. The time allowed to isolate the associated main steam lines is extended from 8 hours to 12 hours to allow for more orderly power reduction. | 3.3.6.1 ACTION D | Table 3.2.A-1 Action 21 | 5, 6 |
| 3.3.6.2, Secondary Containment Isolation Instrumentation | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST. | SR 3.3.6.2.6 | 4.2.A.2, 4.7.P.4.b | 10 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | | |
|--|--|--|--|------|
| LE.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION. | SR 3.3.6.2.5 | 4.2.A.1 for Table 4.2.A-1 Functional Unit 2.a | 10 |
| LF.1 | Revises the Current Technical Specifications (CTS) Trip Setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy"). | Table 3.3.6.2-1 | Table 3.2.A-1 | 1 |
| L.1 | Isolation of secondary containment on Reactor Vessel Water Level—Low is required by the CTS to be Operable during CORE ALTERATIONS. The ITS does not include the Applicability of CORE ALTERATIONS for this Function, since automatic secondary containment isolation capabilities on reactor vessel water level decreases are not necessary during CORE ALTERATIONS. | N/A | Tables 3.2.A-1 and 4.2.A-1 Functional Unit 2.a, including footnote * | 2 |
| L.2 | ITS includes Required Actions to require declaring the affected components inoperable and taking the appropriate actions in the associated Secondary Containment Isolation Valve or SGT Systems Specification if the associated penetrations and SGT subsystems are not placed in the proper condition within 1 hour. Currently, a CTS 3.0.C entry would be required, since no further Actions are provided. | 3.3.6.2 Required Actions C.1.2 and C.2.2 | Table 3.2.A-1 Action 24 | 4, 5 |
| | | | | |
| 3.3.6.3, Relief Valve Instrumentation | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST and CHANNEL FUNCTIONAL TEST portion of the CHANNEL CALIBRATION. | SR 3.3.6.3.2 | 4.6.F.1.b, 4.6.F.1.a | 10 |
| LE.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION. | SR 3.3.6.3.1 | 4.6.F.1.b | 10 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | | |
|---|---|------------------|--|----|
| LF.1 | Revises the Current Technical Specifications (CTS) Trip Setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy"). | Table 3.3.6.3-1 | 3.6.F | 1 |
| | | | | |
| 3.3.7.1, CREV System Instrumentation | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST. | SR 3.3.7.1.6 | 4.2.A.2 | 10 |
| LE.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION. | SR 3.3.7.1.5 | 4.2.A.1 for Table 4.2.A-1 Functional Units 2.a and 3.d | 10 |
| LF.1 | Revises the Current Technical Specifications (CTS) Trip Setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy"). | Table 3.3.7.1-1 | Table 3.2.A-1 | 1 |
| L.1 | With a MSL Flow—High Function channel inoperable and not restored, the CTS requires the plant to be in at least STARTUP with the associated isolation valves closed within 8 hours or be in at least HOT SHUTDOWN within 12 hours and COLD SHUTDOWN within the next 24 hours. In the ITS, the requirement to isolate the associated Main Steam Lines has been retained, however two new options have been added in lieu of requiring the unit to be in startup or to be fully shutdown. The new actions require either the isolation of each required control room penetration flow path within 1 hour or to declare the CREV System inoperable within 1 hour. In addition, the Completion Time to isolate the associated main steam line(s) has been reduced from 8 hours to 1 hour. | 3.3.7.1 ACTION D | Table 3.2.A-1 Action 21 | 5 |


**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | | |
|--|---|----------------------------|--|----|
| L.2 | Isolation of the CREV System on Reactor Vessel Water Level—Low is required by the CTS to be Operable during CORE ALTERATIONS. The ITS does not include the Applicability of CORE ALTERATIONS for this Function, since automatic CREV System isolation capabilities on reactor vessel water level decreases are not necessary during CORE ALTERATIONS. | N/A | Tables 3.2.A-1 and 4.2.A-1 Functional Unit 2.a, including footnote * | 2 |
| 3.3.7.2, Mechanical Vacuum Pump Trip Instrumentation | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST. | SR 3.3.7.2.5 | 4.2.L.4 | 10 |
| LE.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION. | SR 3.3.7.2.4 | 4.2.L.3 | 10 |
| LF.1 | Revises the Current Technical Specifications (CTS) Trip Setpoint to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy"). | SR 3.3.7.2.4 | 4.2.L.3 | 1 |
| 3.3.8.1, Loss of Power Instrumentation | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL FUNCTIONAL TEST and LOGIC SYSTEM FUNCTIONAL TEST. | SR 3.3.8.1.3, SR 3.3.8.1.5 | 4.2.B.1 for Table 4.2.B-1 Functional Unit 5.a, 4.2.B.2 | 10 |
| LE.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION. | SR 3.3.8.1.4 | 4.2.B.1 for Table 4.2.B-1 Functional Unit 5.a | 10 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | | |
|---|--|---|--|----|
| LF.1 | Revises the Current Technical Specifications (CTS) Trip Setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy"). | Table 3.3.8.1-1 | Table 3.2.B-1 | 1 |
| L.1 | Adds a Note to allow a channel to be inoperable for up to 2 hours solely for performance of required Surveillances provided the associated Function maintains initiation capability for one DG and associated 4160 V ESS bus. | 3.3.8.1 Surveillance Requirements Note 2 | N/A | 6 |
| | | | | |
| 3.3.8.2, RPS Electric Power Monitoring | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the system functional test. | SR 3.3.8.2.3 | 4.9.G.2 | 10 |
| LE.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION. | SR 3.3.8.2.2 | 4.9.G.2 | 10 |
| LF.1 | Revises the Current Technical Specifications (CTS) setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy"). | SR 3.3.8.2.2 | 4.9.G.2.a, 4.9.G.2.b, 4.9.G.2.c | 1 |
| L.1 | Changes the Applicability from MODES 1, 2, and 3 and MODES 4 and 5 with any control rod withdrawn to only include MODES 1 and 2 and MODE 5 with any control rod withdrawn, consistent with the Applicability of the RPS Instrumentation, which is the equipment required to be protected by the RPS Electric Power Monitoring Assemblies. In addition, modifies CTS 4.9.G footnote (b) to require performance of the Channel Functional Test Surveillance prior to entry into MODE 2, consistent with the change to the Applicability. | 3.3.8.2 Applicability, SR 3.3.8.2.1 Note | 3.9.G Applicability, 4.9.G footnote (b) | 2 |
| L.2 | Extends the allowed out of service time for two inoperable RPS electric power monitoring assemblies from 30 minutes to 1 hour to provide sufficient time for plant personnel to take corrective actions. | 3.3.8.2 Required Action B.1 | 3.9.G Action 2 | 6 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION**

| | | | | |
|--|--|--|-----------------------|------|
| L.3 | The CTS Applicability is modified from requiring RPS Electric Power Monitoring to be OPERABLE in MODE 5 with any control rod withdrawn to only requiring RPS Electric Power Monitoring to be OPERABLE in MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies. | 3.3.8.2 Applicability | 3.9.G footnote (a) | 2 |
| L.4 | The CTS does not provide any actions if the RPS EPAs are not restored or the associated RPS MG set or alternate power supply is not removed from service (which de-energizes the associated RPS bus). Thus, CTS 3.0.4 is required to be entered. However, since CTS 3.0.4 is not applicable in MODE 5, 10 CFR 50.36(c)(2) requires that the licensee notify the NRC if required by 10 CFR 50.72, and a Licensee Event Report (LER) be submitted to the NRC as required by 10 CFR 50.73. In lieu of these two requirements, the ITS provides a new ACTION if the Required Actions of Condition A or B are not met in MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies. The ITS requires action to be initiated to fully insert all insertable control rods in core cells containing one or more fuel assemblies. | 3.3.8.2 ACTION D  | N/A | 5 |
| | | | | |
| Current Specification 3/4.2.H, Explosive Gas Monitoring | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.2.I, Suppression Chamber and Drywell Spray Actuation | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.2.K, Toxic Gas Monitoring | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|---|--|--------------------|------------------|-------------|
| 3.4.1, Recirculation Loops Operating | | | | |
| L.1 | Deletes the explicit requirement in CTS 3.6.A Action 1.e to electrically prohibit the idle recirculation pump from starting except to permit testing in preparation for returning the pump to service. | N/A | 3.6.A Action 1.e | 4 |
| L.2 | Replaces the required action of CTS 3.6.C Action 2 to trip one of the recirculation pumps when the speed mismatch (i.e. flow mismatch) is not within limits with a requirement (ITS 3.4.1 ACTION B) to declare the loop with the low flow "not in operation." Once the declaration has been made, the appropriate actions for single loop operation must be taken in accordance with CTS 3.6.A.1 (ITS 3.4.1). | 3.4.1 ACTION B | 3.6.C Action 2 | 4 |
| L.3 | CTS 4.6.C requires the recirculation pump speed mismatch (i.e., jet pump loop flow mismatch in ITS) to be verified within the limits once per 24 hours when in Operational MODES 1 and 2 during two recirculation loop operation. Since CTS 4.6.C cannot be performed prior to its Applicability (as required by CTS 4.0.D) if shifting from single loop to two loop operation while in MODE 1 or 2, a note is added providing an allowance for time to initiate Frequency to avoid intentional entry into the ACTIONS each time the second recirculation pump is started. | SR 3.4.1.1 Note | N/A | 3 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM**

| | | | | |
|---|---|----------------------|--|--|
| L.4 | CTS 3.6.C requires the recirculation pump speeds to be maintained within prescribed limits. With THERMAL POWER \geq 80% of RATED THERMAL POWER the recirculation pump speeds must be within 10% of each other, and with THERMAL POWER < 80% of RATED THERMAL POWER, recirculation pump speeds must be within 15% of each other. In proposed SR 3.4.1.1, the jet pump loop flow mismatch with both recirculation loops in operation is: \leq 10% of rated core flow when operating at < 70% of rated core flow; and \leq 5% of rated core flow when operating at \geq 70% of rated core flow. The required loop mismatch criteria has been changed from a recirculation pump speed comparison to a core flow comparison. In addition, the cutoff point for the criteria is with respect to total core flow instead of thermal power level. The proposed mismatch tolerance is actually smaller than in CTS at high pump speeds and larger than in CTS at lower pump speeds, therefore the change is considered less restrictive. | SR 3.4.1.1 | 3.6.C | 1 |
| <div style="text-align: center;"> 5 3, and 4 </div> | | | | |
| 3.4.2, Jet Pumps | | | | |
| L.1 | Deletes the requirements of CTS 3.6.B and associated Action 2 concerning jet pump flow indication since it does not necessarily relate directly to the structural integrity of the jet pumps. | N/A | 3.6.B, Action 2 3.6.B | 1, 4 3, and 4 |
| L.2 | Adds a Note to CTS 4.6.B.1 and CTS 4.6.B.2 (proposed SR 3.4.2.1 Note 1), to allow a 4-hour delay in performance of the Surveillance after the associated recirculation loop is restored to operation. The Note allows the Surveillance not to be performed until four hours after the associated recirculation loop is in operation, because these checks can only be performed during jet pump operation (i.e., when the loop is in operation). | SR 3.4.2.1 Note 1 | N/A | 3 |
| 3.4.3, Safety and Relief Valves | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM**

| | | | | |
|---|--|---|----------------|----|
| L.1 | Deletes the requirement of CTS 3.6.F Action 1 for an open relief valve to be closed provided the suppression pool temperature is <110°F. If unable to close the open relief valve, or if suppression pool temperature is ≥ 110°F, the reactor mode switch must be placed in shutdown. | N/A | 3.6.F Action 1 | 4 |
| | | | | |
| 3.4.4, RCS Operational Leakage | | | | |
| L.1 | Extends the Surveillance Frequency for verifying the RCS operational leakage is within limits from "8 hours not to exceed 12 hours" to "12 hours." | SR 3.4.4.1 | 4.6.H.2 | 3 |
| | | | | |
| 3.4.5, RCS Leakage Detection Instrumentation | | | | |
| LE.1 | Relaxation of the Surveillance Frequency from 18 to 24 months for performing the Channel Calibrations of the RCS leakage detection instrumentation. | SR 3.4.5.3 | 4.6.G.2 | 10 |
| L.1 | Adds a Note that LCO 3.0.4 is not applicable for the condition of the drywell floor drain sump monitoring system inoperable or the primary containment atmospheric particulate monitoring system inoperable. | 3.4.5 ACTIONS A and B Note | N/A | 7 |
| L.2 | CTS 3.6.G Action 1 requires the restoration of the inoperable primary containment atmospheric particulate radioactivity sampling system leakage detection system to OPERABLE status within 24 hours. Proposed ITS 3.4.5, Required Action B.2 requires an inoperable primary containment atmospheric monitoring system be restored to OPERABLE status within 30 days. | 3.4.5 Required Action B.2 | 3.6.G Action 1 | 6 |
| L.3 | Adds a Note to allow a channel to be inoperable for up to 6 hours solely for performance of required Surveillances provided the other Leakage Detection System instrumentation is OPERABLE. | 3.4.5 Surveillance Requirements Note | N/A | 6 |
| | | | | |
| 3.4.6, RCS Specific Activity | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM**

| | | | | |
|---|---|-----------------|----------------|------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.4.7, RHR Shutdown Cooling System - Hot Shutdown | | | | |
| L.1 | Adds proposed LCO 3.4.7 Note which allows one RHR shutdown cooling subsystem to be inoperable up to 2 hours to perform Surveillances since tests are required that necessitate leaving the RHR Shutdown Cooling System in an inoperable status during the performance. | LCO 3.4.7 Note | N/A | 1 |
| L.2 | Adds a Note making SR 3.0.4 not applicable to provide the necessary time to place the system in service following the reduction of pressure to below the cut-in permissive pressure setpoint, since the system cannot be placed in service until the suction valves high pressure closure interlock is cleared. | SR 3.4.7.1 Note | N/A | 7 |
| | | | | |
| 3.4.8, RHR Shutdown Cooling System - Cold Shutdown | | | | |
| L.1 | Adds proposed LCO 3.4.8 Note which allows one RHR shutdown cooling subsystem to be inoperable up to 2 hours to perform Surveillances since tests are required that necessitate leaving the RHR Shutdown Cooling System in an inoperable status during the performance. | LCO 3.4.8 Note | N/A | 1 |
| L.2 | Deletes the requirement in CTS 3.6.P Action 2 to immediately initiate corrective action to return at least one subsystem to OPERABLE status as soon as possible. | N/A | 3.6.P Action 2 | 4 |
| | | | | |
| 3.4.9, RCS Pressure and Temperature (P/T) Limits | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM**

| | | | | |
|---|---|---------------------------------|----------------|------|
| L.1 | CTS 3.6.K Action 2 specifies a Completion Time of 72 hours for the required engineering evaluation with an LCO applicability of "at all times." Proposed ITS 3.4.9, Required Action C.2, (applicable when in conditions other than MODES 1, 2, and 3) requires completion "prior to entering MODE 2 or 3." While Required Action C.2 is intended to be initiated without delay, it is not restricted to a specified Completion Time, only by a restriction on returning to (entering) operating MODES (i.e., 1, 2, or 3) where additional stresses (heatup/criticality) may be imposed. | 3.4.9 Required Action C.2 | 3.6.K Action 2 | 6 |
| L.2 | CTS 4.6.K.2.a requires the rate of change of primary system coolant temperature to be determined within limits 15 minutes prior to withdrawal of control rods and at least once per 30 minutes during primary system heatup or cooldown. The requirement to verify the rate of change during the 15 minute period prior to withdrawal of control rods has been deleted, however, the Frequency of once every 30 minutes has been retained as proposed in SR 3.4.9.1 during heatup and cooldown. | N/A | 4.6.K.2.a | 3 |
| | | | | |
| 3.4.10, Reactor Steam Dome Pressure | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.6.N, Structural Integrity | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|-----------------------|--|--|---|-------------|
| 3.5.1, ECCS-Operating | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 to 24 months for the following Surveillances: Verification of HPCI system flow, verification that ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal; verification that ADS actuates on an actual or simulated automatic initiation signal; and manually opening each required ADS valve. | SR 3.5.1.7, SR 3.5.1.8, SR 3.5.1.9, SR 3.5.1.10 | 4.5.A.3.a, 4.5.A.3.b.1), 4.5.A.3.b.2), 4.5.A.4.a, 4.5.A.4.b | 10 |
| L.1 | Reduces the number of ADS valves required to be OPERABLE in CTS 3.5.A.4 from five to four based on the analysis summarized in the UFSAR. | LCO 3.5.1 | 3.5.A.4 4.5.A.4.b | 1 |
| L.2 | Deletes the ECCS discharge line keep fill alarm instrumentation, since ITS does not specify alarm-only equipment to be OPERABLE to support OPERABILITY of a system or component. | N/A | 3.5.A Action 5, 4.5.A.3.c | 3, 4 |
| L.3 | Adds ITS 3.5.1 ACTION G for the condition of HPCI inoperable coincident with one low pressure coolant injection subsystem (or one LPCI pump in each subsystem) inoperable. The current Technical Specifications require entry into Specification 3.0.C (ITS LCO 3.0.3) for these conditions, implying that the plant is outside design basis. The analyses summarized in the UFSAR demonstrate that adequate core cooling is provided by the OPERABLE HPCI and the remaining OPERABLE low pressure injection/spray systems. | 3.5.1 ACTION G ADS | N/A | 5 |
| L.4 | Elimination of the requirement to submit a Special Report for ECCS actuation and injection as it is adequately addressed by 10 CFR 50.73(a)(2)(iv). | N/A | 3.5.A Action 7 | 9 |
| 3.5.2, ECCS-Shutdown | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 to 24 months for the Surveillance that verifies the CS and LPCI functional test on an actual or simulated automatic initiation signal. | SR 3.5.2.5 | 4.5.B | 10 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM**

| | | | | |
|--------------------|---|---|---|------|
| L.1 | Deletion of requirements to: 1) suspend CORE ALTERATIONS when both ECCS subsystems are inoperable; and 2) suspend CORE ALTERATIONS when the suppression pool water level requirement is not within limit. | N/A | 3.5.B Action 2, 3.5.C Action 2 | 4 |
| L.2 | Relaxes the limitation in CTS 3.5.C if the water source is only available from the CCST and OPDRVs are in progress. If OPDRVs are in progress only one ECCS subsystem is allowed to credit the CCST as indicated in proposed Note to SR 3.5.2.1.b, therefore, one ECCS subsystem must be declared inoperable. This is necessary since the available volume is limited. This will therefore limit the time that OPDRVs can be performed, since an ECCS subsystem must be declared inoperable and ITS 3.5.2 Required Action A.1 only provides 4 hours to restore the inoperable ECCS subsystem to OPERABLE status prior to suspending OPDRVs. Therefore, when credit is being taken for the CCST and the suppression pool level is not within limits operations must be in accordance with ITS 3.5.2 ACTIONS A and B, where the Required Action of Condition B precludes OPDRVs (note that Condition B applies 4 hours after Condition A, i.e., one ECCS subsystem inoperable, is entered). | 3.5.2 (9) 3.5.2 Required Action A.1 SR 3.5.2.1.b Note | 3.5.C (5) 3.5.C Action 2 3.5.C Action 2 | 5 |
| L.3 | Deletes the requirement to "lock" the reactor mode switch in shutdown when the suppression pool is not within the required limit. The position of the reactor mode switch is controlled by the MODES definition Table. | N/A | 3.5.C.2.b (8) | 8 |
| L.4 | Revises CTS 4.5.C.2.b, the verification that the requirements in CTS 3.5.C.2 are satisfied every 12 hours when the suppression chamber water level limit is not met, to only require the Surveillances to be verified at the current specified frequencies not at this 12 hour frequency. | SR 3.5.2.1.b | 4.5.C.2.b | 3 |
| L.5 | Decreases condensate storage tank water level requirement from 140,000 available gallons to 50,000 available gallons. | SR 3.5.2.1.b | 3.5.B.1.a.2), 3.5.B.2.b.2), 3.5.C.2.c | 1, 3 |
| 3.5.3, RCIC System | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM**

| | | | | |
|------|--|---------------------------|---------------------------------------|----|
| LD.1 | Relaxation of Surveillance Frequency from 18 to 24 months for the Surveillances that provide 1) an RCIC system functional test, and 2) an RCIC low pressure flow test. | SR 3.5.3.4, SR 3.5.3.5 | 4.5.D.3.a, 4.5.D.3.b, 4.5.D.3.c | 10 |
| | | | | |

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|---------------------------------------|---|----------------------------------|-------------------------|-------------|
| 3.6.1.1, Primary Containment | | | | |
| LD.1 | Relaxation of routine Surveillance Frequency from 18 months to 24 months and relaxation of additional tests required if routine test fails two times in a row from 9 months to 12 months for performing the drywell-to-suppression chamber bypass leakage test. | SR 3.6.1.1.2 | 4.7.K.5 | 10 |
| L.1 | In the ITS presentation, drywell-to-suppression chamber bypass leakage outside limits will result in declaring the Primary Containment inoperable, requiring commencing a shutdown to MODES 3 and 4 if the leakage problem is not corrected within 1 hour. With the drywell-to-suppression chamber bypass leakage outside of limits in MODE 1, 2, or 3, the CTS does not provide actions. Since drywell-to-suppression chamber leakage are attributes of maintaining Primary Containment Integrity, a 1 hour allowed outage time is provided for this condition consistent with the primary containment is inoperable. | 3.6.1.1 ACTION A <i>being</i> | 3.0.C N/A | 6 |
| L.2 | Deletes the requirement for the NRC to review the test schedule for subsequent tests if any drywell-to-suppression chamber bypass leakage rate test result is not within the required limits since the NRC has already approved the test schedule in the Technical Specification. | N/A | 4.7.K.5 | 9 |
| L.3 | Not used. | N/A | N/A | N/A |
| 3.6.1.2, Primary Containment Air Lock | | | | |
| L.1 | Adds ITS ACTIONS Note to allow entry through a closed or locked air lock door for the purpose of making repairs. The proposed allowance will have strict administrative controls, which are detailed in the Bases. | 3.6.1.2 ACTIONS Note 1 | 3.7.C ACTIONS | 4 |
| L.2 | Not used. | | | |

NRC
3.0.C
not
referenced
in DOC
L.3 or
CTS
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See
Comment
3

Insert L.2

*3.6.1.2
Required Actions A.1 and
C.2*

*3.7.C
Actions 1.a and 3*

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS**

| | | | | |
|---|---|--|--------------------------------------|----|
| L.3 | Adds ITS Required Action Notes to allow administrative means to be used to verify a locked closed OPERABLE air lock door in high radiation areas or areas with limited access due to inerting. | 3.6.1.2 Required Actions A.3 and B.3 Notes | <u>3.7.C</u> ACTIONS N/A | 4 |
| L.4 | CTS 3.7.C Action 1 footnote (b) limits the time an inoperable primary containment air lock door can be used to facilitate the removal of personnel for a cumulative time not to exceed one hour per year. The ITS does not include a cumulative time period per year to limit entry and exit into the primary containment with one inoperable air lock door, however, the use of the air lock will be limited to an explicit time period for any single entry into the Condition as long as administrative controls are imposed. ITS 3.6.1.2 Required Action A Note 2 is added to the Technical Specifications to allow entry through a closed and/or locked OPERABLE air lock door (for reasons other than repairs) for 7 days under administrative controls. The new allowance is proposed to have strict administrative controls, which are detailed in the Bases. | 3.6.1.2 Required Action A Note 2 | 3.7.C Action 1 footnote (b) | 4 |
| L.5 | Change the Frequency for the air lock interlock test from once per 6 months only upon entry into the primary containment air lock when primary containment is de-inerted, to 24 months. | SR 3.6.1.2.2 | 4.7.C.2 including footnote (e) | 3 |
| L.6 | Deletes requirement to have one air lock door "locked" closed at all times. | N/A | 3.7.C Action 2 | 4 |
| 3.6.1.3, Primary Containment Isolation Valves | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for performing the automatic PCIV actuation test, EFCV actuation test, and TIP squib valve initiation test. | SR 3.6.1.3.7, SR 3.6.1.3.8, SR 3.6.1.3.9 | 4.7.D.2, 4.7.D.4, 4.7.D.5.b | 10 |

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**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS**

| | | | | |
|-----|---|--|---------------------------------------|------|
| L.1 | CTS 3.7.D Action 1 requires an inoperable PCIV (except for MSIVs and reactor building-suppression chamber vacuum breakers) to be restored or the affected penetration isolated in 4 hours. The ITS allows 72 hours to isolate the affected penetration when a PCIV is inoperable in a penetration with a closed system (as specifically defined in NUREG-0800) or in a penetration whose system piping communicates with the suppression pool and is expected to remain submerged during the accident (i.e., a closed system as defined in the UFSAR), and only one PCIV. | 3.6.1.3 Required Action C.1 | 3.7.D Action 1 | 6 |
| L.2 | The CTS list some, but not all, of the possible acceptable isolation devices that may be used to satisfy the need to isolate a penetration with an inoperable isolation valve. The ITS provides a complete list of acceptable isolation devices. | 3.6.1.3 ACTIONS A, B, and C | 3.7.D Action 1.c, 3.6.M Action | 4 |
| L.3 | In the event two or more valves in a penetration are inoperable, CTS 3.7.D Action 1 and the CTS 3.6.M Action, which require maintaining one isolation valve OPERABLE, would not be met and an immediate shutdown would be required. The ITS provides 1 hour prior to commencing a required shutdown, consistent with the existing time allowed for conditions when the primary containment is inoperable. | 3.6.1.3 ACTION B | 3.7.D Action 1, 3.6.M Action | 6 |
| L.4 | Adds an allowance for intermittently opening, under administrative control, closed primary containment isolation valves, other than those currently allowed to be opened using CTS 3.7.D and Action 1 footnote (a). | 3.6.1.3 ACTIONS Note 1, SR 3.6.1.3.2, SR 3.6.1.3.3 | 3.7.D and Action 1 footnote (a) | 1, 4 |
| L.5 | Deletes CTS 4.7.D.1, since explicit post maintenance Surveillance Requirements are not required. | N/A | 4.7.D.1 | 3 |
| L.6 | Addition of the phrase "actual or," in reference to the automatic isolation signal for the Surveillance that verifies each PCIV actuates on an automatic isolation "test" signal. | SR 3.6.1.3.7 | 4.7.D.2 | 3 |
| L.7 | Deletes the requirement that each excess flow check valve must check flow. The ITS requires the EFCVs to actuate to their isolation position (i.e., closed) on an actual or simulated instrument line break signal. | SR 3.6.1.3.8 | 4.7.D.4 | 3 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS**

| | | | | |
|---|--|--|---------------------------------------|------|
| L.8 | Extends from 4 hours to 72 hours the time to either repair the inoperable excess flow check valve or isolate the associated instrument. | 3.6.1.3 Required Action C.1 | 3.7.D Action 2 | 6 |
| L.9 | The requirements related to verification of the position of primary containment isolation manual valves and blind flanges, are revised in the ITS to exclude verification of manual valves and blind flanges that are locked, sealed, or otherwise secured in the correct position. | SR 3.6.1.3.2, SR 3.6.1.3.3 | 4.7.A.2, including footnote (b) | 3 |
| L.10 | Adds Note to allow the verification of the isolation devices used to isolate the penetrations in high radiation areas to be verified by use of administrative means, regardless of whether or not the isolation devices are inside the primary containment. In addition, adds a Note to allow verification of isolation devices that are locked, sealed, or otherwise secured to also be performed using administrative means. | 3.6.1.3 Note 1 to Required Actions A.2 and C.2, SR 3.6.1.3.2, 3.6.1.3 Note 2 to Required Actions A.2 and C.2 | 4.7.A.2 footnote (b) | 3, 4 |
| | | | | |
| 3.6.1.4, Drywell Pressure | | | | |
| NON E | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.1.5, Drywell Air Temperature | | | | |
| NON E | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.1.6, Low Set Relief Valves | | | | |

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

| | | | | |
|--|--|---|--|---------|
| L.1 | Deletes the CTS requirement to place the reactor mode switch in shutdown if unable to close the open relief valve or if suppression pool temperature is $\geq 110^{\circ}\text{F}$, since Required Action D.1 of ITS 3.6.2.1 will also require that the reactor mode switch be immediately placed in shutdown if the suppression pool average temperature is $\geq 110^{\circ}\text{F}$. | N/A | 3.7.F Action 1 (6) | 5 |
| 3.6.1.7, Reactor Building-to-Suppression Chamber Vacuum Breakers | | | | |
| LD.1 | Relaxation of the Surveillance Frequency from 18 months to 24 months for performing the verification that the opening setpoint of each vacuum breaker is ≤ 0.5 psid. | SR 3.6.1.7.3 | 4.7.F.2.b.1) | 10 |
| L.1 | Adds an ACTION to allow two lines to have all vacuum breakers inoperable for opening for up to one hour without requiring a shutdown, as is currently required by CTS 3.0.C. → | 3.6.1.7 (3) ACTION D 3.6.1.7 ACTIONS Note | 3.0.C N/A | 6 |
| L.2 | Deletes the vacuum breaker position indication instrumentation, since it does not necessarily relate directly to the respective system OPERABILITY. | N/A | 3.7.F Action 3, 4.7.F.2.a.2), 4.7.F.2.b.2) | 1, 3, 4 |
| L.3 | Relaxation of the Surveillance Frequency from 7 days to 14 days for verifying the vacuum breakers are closed. | SR 3.6.1.7.1 | 4.7.F.1 | 3 |
| L.4 | Adds a Note to the Surveillance to allow vacuum breakers to be open during the performance of required Surveillances. | SR 3.6.1.7.1, Note 1 | 4.7.F (F.1) | 3 |
| 3.6.1.8, Suppression Chamber-to-Drywell Vacuum Breakers | | | | |
| LD.1 | Relaxation of the Surveillance Frequency from 18 months to 24 months for performing the verification that the opening setpoint of each vacuum breaker is ≤ 0.5 psid. | SR 3.6.1.8.3 | 4.7.E.2.c.1) | 10 |

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In addition, add ITS ACTIONS Note, "Separate Condition entry is allowed for each line," to provide proper direction for inoperable vacuum breakers.

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS**

| | | | | |
|--|--|--|--|---------|
| L.1 | Deletes the vacuum breaker position indication instrumentation, since it does not necessarily relate directly to the respective system OPERABILITY. | N/A | 3.7.E Action 3, 4.7.E.2.b, 4.7.E.2.c.2), 4.7.E.2.c.3) | 1, 3, 4 |
| L.2 | Relaxation of the Surveillance Frequency from 7 days to 14 days for verifying the vacuum breakers are closed. | SR 3.6.1.8.1 | 4.7.E.1 | 3 |
| L.3 | Adds a Note stating that the vacuum breakers can be opened when performing required Surveillances. CTS requires that the vacuum breakers be closed at all times; with no allowance for opening during performances of required Surveillances. | SR 3.6.1.8.1 Note 1 | 4.7.E.1 | 3 |
| | | | | |
| 3.6.2.1, Suppression Pool Average Temperature | | | | |
| L.1 | Removes the details of how to reduce suppression pool temperature to within the limits (by operating at least one residual heat removal loop in the suppression pool cooling mode). | N/A | 3.7.K Action 4 | 4 |
| L.2 | When the suppression pool temperature is > 95°F but ≤ 110°F, the CTS requires a 30 minute suppression pool temperature verification and an hourly power level verification. When suppression pool temperature is > 95°F and ≤ 110°F, and power is > 1% RTP, ITS requires verification of suppression pool temperature once per hour in this condition. If < 1% RTP, SR 3.6.2.1.1 verification of temperature every 24 hours is sufficient. | 3.6.2.1 Required Action A.1, SR 3.6.2.1.1 | 4.7.K.2.c, 4.7.K.2.b.2) | 3, 6 |
| | | | | |
| 3.6.2.2, Suppression Pool Water Level | | | | |
| L.1 | Extends from 1 hour to 2 hours the time to restore level when the suppression pool water level is outside the limits. | 3.6.2.2 Required Action A.1 | 3.7.K Action 1, 3.5.C Action 1 | 6 |
| | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS**

| 3.6.2.3, RHR Suppression Pool Cooling | | | | |
|---|--|---------------------|------------------------------------|---------|
| L.1 | Adds a restoration time (8 hours) when both suppression pool cooling subsystems are inoperable. Currently, no time is provided; CTS 3.7.M Action 2 requires a unit shutdown. | 3.6.2.3 ACTION B | 3.7.M Action 2 | 6 |
| | | | | |
| 3.6.2.4, RHR Suppression Pool Spray | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.2.5, Drywell-to-Suppression Chamber Differential Pressure | | | | |
| L.1 | Deletes the drywell-suppression chamber differential pressure instrumentation, since it does not necessarily relate directly to the respective system OPERABILITY. | N/A | 3.7.H Actions 2, 3, and 4, 4.7.H.2 | 1, 3, 4 |
| | | | | |
| 3.6.3.1, Primary Containment Oxygen Concentration | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.4.1, Secondary Containment | | | | |
| LD.1 | Relaxation of the Surveillance Frequency from 18 months to 24 months for performing CTS 4.7.N.3, which ensures that the Secondary Containment is OPERABLE. | SR 3.6.4.1.3 | 4.7.N.3 | 10 |
| | | | | |

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

| 3.6.4.2, Secondary Containment Isolation Valves | | | | |
|---|--|---|--------------------|------|
| LD.1 | Relaxation of the Surveillance Frequency from 18 months to 24 months for verification that each automatic SCIV actuates to the isolation position on an actual or simulated automatic isolation signal. | SR 3.6.4.2.3 | 4.7.O.2 | 10 |
| L.1 | Adds an allowance for intermittently opening, under administrative control, closed secondary containment isolation valves under , other than those currently allowed to be opened using CTS 4.7.N, footnote (a) (locked or sealed-closed penetrations). <i>dampers</i> <i>damper</i> | 3.6.4.2 ACTIONS Note 1, SR 3.6.4.2.1 Note 2 | 4.7.N footnote (a) | 1 |
| L.2 | In the event both valves in a penetration are inoperable in an open penetration, the CTS 3.7.O Action, which requires maintaining one isolation valve OPERABLE, would not be met and an immediate shutdown would be required. The ITS provides 4 hours prior to commencing a required shutdown, consistent with the existing time allowed for conditions when the secondary containment is inoperable. | 3.6.4.2 ACTION B | 3.7.O Action | 6 |
| L.3 | Deletes CTS 4.7.O.1, since explicit post maintenance Surveillance Requirements are not required. | N/A | 4.7.O.1 | 3 |
| L.4 | Addition of the phrase "actual or," in reference to the automatic isolation signal for the Surveillance Requirement that verifies each SCIV actuates on an automatic isolation "test" signal. | SR 3.6.4.2.3 | 4.7.O.2 | 3 |
| L.5 | The requirements related to verification of the position of secondary containment isolation penetrations not capable of being closed by OPERABLE secondary containment isolation valves (SCIVs), are revised in the ITS to exclude verification of manual valves and blind flanges that are locked, sealed, or otherwise secured in the correct position. | 3.6.4.2 Required Action A.2 Note 2, SR 3.6.4.2.1 | 4.7.N.2.b | 3, 4 |
| 3.6.4.3, Standby Gas Treatment System | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS**

| | | | | |
|------|--|-----------------------------------|------------------|----|
| LD.1 | Relaxation of the Surveillance Frequency from 18 months to 24 months for verification that each SGT subsystem actuates on an actual or simulated automatic initiation signal. | SR 3.6.4.3.3 | 4.7.P.4.b | 10 |
| L.1 | The CTS requires suspending operations if an SGT subsystem cannot be returned to OPERABLE status within 7 days, and movement of irradiated fuel assemblies, CORE ALTERATIONS, or OPDRVs are being conducted. As an alternative, the ITS will allow the OPERABLE SGT subsystem to be placed in operation and continue to conduct operations (e.g., OPDRVs). | 3.6.4.3 Required Action C.1 | 3.7.P Action 1.b | 5 |
| L.2 | Addition of the phrase "actual or," in reference to the automatic initiation signal for the Surveillance that verifies each subsystem actuates on an automatic initiation "test" signal. | SR 3.6.4.3.3 | 4.7.P.4.b | 3 |
| | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|--|---|---------------------------|-------------------------|-------------|
| 3.7.1, Residual Heat Removal Service Water System | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.7.2, Diesel Generator Cooling Water System | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 to 24 month for the DGCW automatic start Surveillance. | SR 3.7.2.2 | 4.8.B.2 | 10 |
| L.1 | Adds the phrase "actual or simulated" in reference to the actuation test signal that verifies that each DGCW subsystem pump starts. | SR 3.7.2.2 | 4.8.B.2 | 3 |
| | | | | |
| 3.7.3, Ultimate Heat Sink | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.7.4, Control Room Emergency Ventilation System | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 to 24 month for the CREV System automatic isolation and operation Surveillances. | SR 3.7.4.3, SR 3.7.4.4 | 4.8.D.5.b, 4.8.D.5.c | 10 |
| L.1 | Adds the phrase "actual or," in reference to the actuation test signal that verifies that each CREV subsystem isolation dampers close on an actuation test signal. | SR 3.7.4.3 | 4.8.D.5.b.2) | 3 |
| L.2 | Deletes the requirement to verify the isolation dampers close on a manual initiation from the control room, since the Control Room Manual Initiation Function is not credited in any design bases accident or transient analysis. | N/A | 4.8.D.5.b.1) | 3 |
| | | | | |

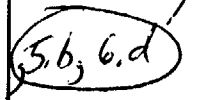
**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS**

| 3.7.5, Control Room Emergency Ventilation Air Conditioning System | | | | |
|---|--|--|----------------------|------|
| LD.1 | Relaxation of Surveillance Frequency from 18 to 24 month for the CREV Air Conditioning System operation Surveillance. | SR 3.7.5.1 | 4.8.D.1 | 10 |
| | | | | |
| 3.7.6, Main Condenser Offgas | | | | |
| L.1 | Extends the time allowed to close the main steam isolation valves from 8 hours to 12 hours. Also deletes the explicit requirement to be in STARTUP since the closure of all main steam line isolation valves will require the mode switch to be placed in the startup/hot standby position to avoid a scram on Main Steam Line Isolation Valve— Closure. | 3.7.6 ACTION B | 3.8.I Action | 5, 6 |
| L.2 | Adds new Required Actions that require the plant to be in MODE 3 in 12 hours and MODE 4 in 36 hours, which exits the new Applicability of the LCO. | 3.7.6 Required Actions B.3.1 and B.3.2 | N/A | 5 |
| L.3 | CTS 4.8.I.2.b requires the main condenser offgas activity to be determined within 4 hours following the determination of an increase of 50%. The ITS requires the performance of this Surveillance at the same Frequency, however it is modified to allow factoring out increases in activity as a result of a THERMAL POWER increase. | SR 3.7.6.1 | 4.8.I.2 | 3 |
| L.4 | Adds a finite time limit to allow the Surveillance to not be performed until 31 days after any main steam line is not isolated and the SJAE is in operation. | SR 3.7.6.1 Note | 4.8.I.2 footnote (b) | 3 |
| | | | | |
| 3.7.7, Main Turbine Bypass System | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.7.8, Spent Fuel Storage Pool Water Level | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS**

| | | | | |
|--|------|------|------|------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.7.9, Safe Shutdown Makeup Pump System | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.8.E, Flood Protection | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.8.F, Snubbers | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.8.G, Sealed Source Contamination | | | | |
| NONE | NONE | NONE | NONE | NONE |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|--------------------------------------|---|--|---|-------------|
| 3.8.1, AC Sources - Operating | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for the following AC sources related Surveillance Requirements: offsite circuit transfer test; single load reject test; full load reject test; LOOP test; LOCA test; automatic trip bypass test; 24 hour run test; hot restart test; DG synchronization shutdown test; load block interval test; and LOCA/LOOP test. | SR 3.8.1.9, SR 3.8.1.10, SR 3.8.1.11, SR 3.8.1.12, SR 3.8.1.13, SR 3.8.1.19, SR 3.8.1.14, SR 3.8.1.15, SR 3.8.1.16, SR 3.8.1.17, SR 3.8.1.18 | 4.9.A.1.b, 4.9.A.8.b, 4.9.A.8.c, 4.9.A.8.d, 4.9.A.8.e, 4.9.A.8.f, 4.9.A.8.g, 4.9.A.8.h, 4.9.A.8.j, 4.9.A.8.k | 10 |
| L.1 | In the event of multiple concurrent AC Source inoperabilities, provides a maximum restoration time limit presented as an additional Completion Time of "14 days from discovery of failure to meet LCO 3.8.1.a or b" in ITS 3.8.1 Required Actions A.3 and B.4. In addition, in the event of multiple DG inoperabilities or multiple offsite circuit inoperabilities, a separate time period is allowed in ITS 1.3 for the subsequent repair. It essentially allows extension of the initial restoration time by 24 hours, not to exceed the actual time if the subsequent inoperability were tracked from its time of loss. | 3.8.1 Required Actions A.3 and B.4 | 3.9.A Actions 1.b, 2.c, 3.d  | 6 |
| L.2 | Deletes the CTS requirement to complete the diesel start test for failures that are potentially generic regardless of when the inoperable diesel is restored to operable status. | N/A | 3.9.A Action 2.b footnote (b) | 4 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| | | | | |
|-----|--|---|------------------------------------|---|
| L.3 | CTS 3.9.A Action 2.b requires a verification within 24 hours and every 72 hours thereafter that the cause of a DG inoperability does not affect the remaining DGs. CTS 3.9.A Action 3.b requires a verification within 8 hours and every 72 hours thereafter, the that the cause of a DG inoperability does not affect the remaining DGs. In both Actions, the initial evaluation or test is not required if a test was performed in the past 24 hours. In addition, when two DGs are inoperable, CTS 3.9.A Action 6.c requires the performance of CTS 4.9.A.2.c (DG slow start) within the subsequent 72 hours after a DG is restored to service. ITS 3.8.1 Required Actions B.3.1 and B.3.2 will continue to require this verification, but will allow 24 hours to perform the verification, and there will be no requirement to re-test the OPERABILITY of the OPERABLE DG. | 3.8.1 Required Actions B.3.1 and B.3.2 | 3.9.A Actions 2.b, 3.b, and 6.c | 6 |
| L.4 | The explicit requirement to periodically verify that each DG is aligned to provide standby power to the associated emergency buses is considered to be unnecessary for ensuring compliance with the applicable Technical Specification Operability requirements and is removed from the Technical Specifications. | LCO 3.8.1 | 4.9.A.2.e | 3 |
| L.5 | CTS 4.9.A.3 requires checking for and removing accumulated water from the DG day tanks every 31 days and "after each operation of the diesel where the period of operation was greater than or equal to 1 hour." ITS SR 3.8.1.5 only requires the check every 31 days; the frequency of "after each operation of the diesel where the period of operation was greater than or equal to 1 hour" has been deleted. | SR 3.8.1.5 | 4.9.A.3 | 3 |
| L.6 | The Completion Time to verify that required systems, subsystems, trains, components, and devices powered from the redundant DG(s) are OPERABLE has been extended from 2 hours to 4 hours. | 3.8.1 Required Action B.2 | 3.9.A Actions 4.a and 6.b | 6 |
| L.7 | For the surveillances that automatically start the DG but do not tie it to a bus, the requirements have been changed to only require the minimum voltage and frequency limits to be met within the appropriate time limits. Once steady state conditions are reached, the minimum and maximum voltage and frequency limits must be maintained. | SR 3.8.1.8, SR 3.8.1.13 | 4.9.A.7, 4.9.A.8.e | 3 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| | | | | |
|------------------------------|--|---|---|---|
| L.8 | The phrase "actual or", in reference to the loss of offsite power signal or the ECCS actuation signal, as applicable, has been added to CTS 4.9.A.8.d, 4.9.A.8.e, 4.9.A.8.f, and 4.9.A.8.g for verifying the proper response of the DG. This allows satisfactory loss of offsite power or ECCS actuations for other than Surveillance purposes to be used to fulfill the Surveillance Requirement. OPERABILITY is adequately demonstrated in either case since the DG cannot discriminate between "actual" or "simulated" signals. | SR 3.8.1.12, SR 3.8.1.13, SR 3.8.1.19, SR 3.8.1.14 | 4.9.A.8.d, 4.9.A.8.e, 4.9.A.8.f, 4.9.A.8.g | 3 |
| L.9 | The manner in which the DG is started for CTS 4.9.A.8.h (i.e., that the DG must be within the proper voltage and frequency within a certain time limit after the start signal) has not been included in the ITS. | SR 3.8.1.15 | 4.9.A.8.h | 3 |
| L.10 | Deletes explicit post maintenance Surveillance Requirements as required by CTS 4.9.A.9 (i.e., after any modifications which could affect DG Interdependence). | N/A | 4.9.A.9 | 3 |
| L.11 | CTS 4.9.A.9 requires the DGs to accelerate to 900 rpm in ≤ 10 seconds. For these DGs, 900 rpm is equivalent to a frequency of 60 Hz. The ITS will require the minimum frequency to be 58.8 Hz, as shown in ITS SR 3.8.1.20, since the accident analysis requires the DG to be capable of being loaded within 10 seconds (this can be accomplished at 58.8 Hz). | SR 3.8.1.20 | 4.9.A.9 | 3 |
| L.12 | The load range requirements of CTS 4.9.A.2.d, CTS 4.9.A.8.c, and CTS 4.9.A.8.h (the 22-hour load requirements only) have been relaxed slightly to provide margin to the DG's continuous rating. The new load range in ITS SRs 3.8.1.3, 3.8.1.11, and 3.8.1.15 is 90% to 100% of the continuous rating (2340 kW to 2600 kW). | SR 3.8.1.3, SR 3.8.1.11, SR 3.8.1.15 | 4.9.A.2.d, 4.9.A.8.c, 4.9.A.8.h | 3 |
| L.13 | Deletes CTS 4.9.A.8, footnote (d), which restricts the performance of CTS 4.9.A.8.c, the DG full load rejection test, and CTS 4.9.A.8.h, the DG 24 hour endurance run, to only one DG at a time. | N/A | 4.9.A.8 footnote (d) | 3 |
| L.14 | Deletes CTS 4.9.A.8.k upper load block limit, such that the interval between each load block is only required to be $\geq 90\%$ of the design load interval. | SR 3.8.1.18 | 4.9.A.8.k | 3 |
| | | | | |
| 3.8.2, AC Sources - Shutdown | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| | | | | |
|--|--|------------------------------------|-----------------------------------|---|
| L.1 | In an effort to consistently address the concern of the only required DG and the only required offsite circuit connected (presenting a significant risk of a single fault resulting in a station blackout) and to avoid potential conflicting Technical Specifications, the Surveillances that would require the DG to be connected to the offsite source are excepted from performance requirements. The exception does not take exception to the requirement for the DG to be capable of performing the particular function; just to the requirement to demonstrate it while that source of power is being relied on to support meeting the LCO. | SR 3.8.2.1 Note 1 | 4.9.B | 3 |
| L.2 | CTS 4.9.B, which provides the Surveillance Requirements for the AC Sources while in Modes 4 and 5 and during handling of irradiated fuel in the secondary containment, requires the Surveillances of CTS 4.9.A to be performed. Two of the Surveillances of CTS 4.9.A are the DG start on an ECCS initiation signal and the DG start and load on an ECCS initiation signal concurrent with a loss of offsite power signal. Note 2 to SR 3.8.2.1 will exempt these two Surveillances when the associated ECCS subsystem(s) are not required to be Operable. | SR 3.8.2.1 Note 2 <i>ing</i> | 4.9.B | 3 |
| L.3 | An alternative is proposed in the ITS to suspend the movement of irradiated fuel assemblies, CORE ALTERATIONS, or OPDRVs if being conducted when less than the required AC sources are OPERABLE. The alternative is to declare required feature(s) inoperable and continue to conduct operations if the affected required features(s) ACTIONS allow. | 3.8.2 Required Action A.1 | 3.9.B Action 1 <i>affected</i> | 4 |
| 3.8.3, Diesel Fuel Oil and Starting Air | | | | |
| L.1 | CTS 3.9.A Action 7 provides a 7 day restoration period for the new fuel oil parameters tested by CTS 4.9.A.5 when they are found not within specified limits. In addition, CTS 3.9.B provides no restoration time when the fuel oil parameters are not within the limits of CTS 4.9.A.5 and 4.9.A.6 in MODES 4 and 5 and when handling irradiated fuel in the secondary containment. ITS 3.8.3 ACTION B will allow 30 days to restore new fuel properties to within the specified limits. If not restored, ITS 3.8.3 ACTION D is provided to declare the DG inoperable. In addition, a 7 day time has been provided in ITS 3.8.3 ACTION A to restore stored fuel oil total particulates to within limits when in MODE 4 or 5, or when handling irradiated fuel in the secondary containment. | 3.8.3 ACTIONS A, B, and D | 3.9.A Actions, 3.9.B Actions | 6 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| | | | | |
|--------------------------------------|--|--|---------------------------------|----|
| L.2 | The diesel starting air parameter, while supporting DG OPERABILITY, contain substantial margin in addition to the limit which would be absolutely necessary for DG OPERABILITY. Therefore, a certain level of degradation in this parameter is justified to extend the allowance for restoration (presented as ITS 3.8.3 ACTION C and ACTIONS Note). During the extended restoration period for this parameter, the DG would still be capable of performing its intended function. ACTION C allows 48 hours to restore starting air pressure prior to declaring the DG inoperable, provided a 1 start capacity remains. ACTION D is provided to declare the DG inoperable if the previous ACTION is not met. During the proposed extended period for restoration of this parameter, the DG would still be capable of performing its intended function. | 3.8.3 ACTIONS Note, 3.8.3 ACTIONS C and D | 3.9.A Actions, 3.9.B Actions | 6 |
| 3.8.4, DC Sources - Operating | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 months to 24 months for the following Surveillances: Visual inspection of battery for physical damage or abnormal deterioration; verification that cell-to-cell and terminal connections are free of corrosion; inter-cell and terminal connection resistance checks; battery charger test; and battery service test. | SR 3.8.4.3, SR 3.8.4.4, SR 3.8.4.5, SR 3.8.4.6, SR 3.8.4.7 | 4.9.C.3, 4.9.C.4 | 10 |
| L.1 | Removes from CTS 4.9.C.2 the requirement to verify, within 7 days after a battery discharge or overcharge, that there is no visible corrosion at either terminals or connectors, or that connection resistance is $< 150 \times 10^{-6} \text{ohm}$ or 20% above baseline connection resistance. <i>Space</i> | N/A | 4.9.C.2 | 3 |
| L.2 | CTS 4.9.C.3.b requires the cell-to-cell and terminal connections to be "clean, tight." The confirmation that the connection is "tight" is typically performed by application of a torque, which results in unnecessary stress being applied to the bolted connection. If the connection satisfies the resistance requirements of ITS SR 3.8.4.5, it can be assumed to be sufficiently "tight." The "clean" requirement has been deleted since it is redundant to the "free of corrosion" requirement. In addition, the requirement to verify that connections are "clean" and "tight" is only applicable to nickel cadmium batteries. The DC electrical power subsystem batteries are lead calcium batteries. | SR 3.8.4.5 | 4.9.C.3.b | 3 |

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

| | | | | |
|--------------------------------|--|---------------------------------|--------------|---|
| 3.8.5, DC Sources - Shutdown | | | | |
| L.1 | Three of the DC sources Surveillances required to be performed by CTS 4.9.D (CTS 4.9.C.4, 4.9.C.5, and 4.9.C.6) involve tests that would cause the only required OPERABLE unit 250V battery to be rendered inoperable. This condition presents a significant risk if an event were to occur during the test. In an effort to consistently address this concern, ITS SR 3.8.5.1 has a Note that excludes performance requirements of Surveillances that would require the required OPERABLE 250V DC battery to be rendered inoperable. This allowance does not take exception to the requirement for the battery to be capable of performing the particular function - just to the requirement to demonstrate that capability while that source of power is being relied on to support meeting the LCO. | SR 3.8.5.1 Note | N/A | 3 |
| L.2 | An alternative is proposed in the ITS to suspend operations if a DC Source is inoperable, and movement of irradiated fuel assemblies, CORE ALTERATIONS, or OPDRVs are being conducted. The alternative is to declare required feature(s) inoperable and continue to conduct operations if the affected required features(s) ACTIONS allow. | 3.8.5 Required Action A.1 | 3.9.D Action | 4 |
| 3.8.6, Battery Cell Parameters | | | | |
| L.1 | Removes the requirement to verify that the average electrolyte temperature of selected battery cells is above 65°F within 7 days after a battery discharge or overcharge. | N/A | 4.9.C.2 | 3 |
| L.2 | Changes the CTS 4.9.C.2.c requirement, which requires measurement of the temperature for all connected cells every 92 days, to only require representative cells (10% of the total, as defined in the Bases) be verified within limits every 92 days. | SR 3.8.6.3 | 4.9.C.2.c | 3 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| | | | | |
|---|--|---|--------------------------|---|
| L.3 | The time specified in CTS 3.9.C Actions 4 and 5 to restore Category A and B battery cell parameters to within limits has been extended from the next 6 days and 7 days, respectively, to 31 days in ITS 3.8.6 Required Action A.3. In addition, periodic verification that the Category C limits are not being exceeded must be performed. ITS 3.8.6 Required Action A.2 requires this verification every 7 days. | 3.8.6 Required Actions A.2 and A.3 | 3.9.C Actions 4 and 5 | 6 |
| L.4 | Adds footnote (a) to the electrolyte level limits for Table 3.8.6-1, Category A and B limits, allowing for a temporary electrolyte level increase during and following an equalize charge. | Table 3.8.6-1 footnote (a) | Table 4.9.C-1 | 1 |
| L.5 | <p>CTS 4.9.D requires the batteries and chargers to be demonstrated OPERABLE per the Surveillance Requirements of CTS 4.9.C. The CTS 4.9.C requirements include battery cell parameter Surveillances. However, the CTS 3.9.D Action does not provide any specific actions for when battery cell parameters are exceeding the limits in CTS 4.9.C. Therefore, the associated DC electrical power sources must be declared inoperable and the Action of CTS 3.9.D must be taken immediately. In lieu of taking the CTS 3.9.D Action immediately, ITS 3.8.6 ACTION A will provide time to restore the Category A and B battery cell parameters prior to declaring the associated DC power source inoperable and taking the Action of CTS 3.9.D (ITS 3.8.5 ACTION A). ITS 3.8.6 ACTION B will require the associated battery to be declared inoperable (thus requiring ACTION A of ITS 3.8.5 to be taken) if ACTION A is not met, if the Category C battery cell parameters are not met, or if the electrolyte temperature is not within the limit.</p> <p><u>Furthermore, if the requirements of LCO 3.8.6 are not met, the associated battery must be declared inoperable, therefore, LCO 3.8.4 requirements must also be met.</u></p> | 3.8.6 ACTIONS A and B | 3.9.D Action | 6 |
| 3.8.7, Distribution Systems - Operating | | | | |

NRC
This statement is not true, only enter LCO 3.8.4 Action if 3.8.6 Action B requires it.

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

| | | | | |
|--|--|---------------------------|-----------------------|---|
| L.1 | CTS 3.9.E Action 1 allows 8 hours to restore one inoperable AC subsystem and CTS 3.9.E Action 2 allows 2 hours to restore one inoperable DC subsystem. No time is provided if buses are inoperable in Division 1 and 2 AC subsystems concurrently or in Division 1 and 2 DC subsystems concurrently, requiring entry into CTS 3.0.C. ITS 3.8.7 ACTIONS A and B allow one "or more" AC and DC electrical power distribution subsystems to be concurrently inoperable, without requiring an ITS 3.0.3 entry; either 8 hours or 2 hours (8 hours for AC and 2 hours for DC) will be allowed to restore the inoperabilities. However, ITS 3.8.7 ACTION E is also added to require that if two or more electrical power distribution subsystems are inoperable and, in combination, result in a loss of function, then ITS 3.0.3 must be entered immediately. | 3.8.7 ACTIONS B and E | 3.9.E Actions 1 and 2 | 6 |
| 3.8.8, Distribution Systems - Shutdown | | | | |
| L.1 | An alternative is proposed in the ITS to suspend the movement of irradiated fuel assemblies, CORE ALTERATIONS, or OPDRVs if being conducted when less than the required AC sources are OPERABLE. The alternative is to declare required feature(s) inoperable and continue to conduct operations if the affected required features(s) ACTIONS allow. | 3.8.8 Required Action A.1 | 3.9.F Action | 4 |

or DC subsystem(s)

distribution

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|---|--|---|---|-------------|
| 3.9.1, Refueling Equipment Interlocks | | | | |
| L.1 | Deletes the requirement to perform the Surveillance Requirement "within 24 hours prior to the start of" use of the component, since the normal 7 day periodic Surveillance Frequency of CTS 4.10.A.2 (proposed SR 3.9.1.1) for the CHANNEL FUNCTIONAL TEST of the reactor mode switch refuel position interlocks provides adequate assurance of OPERABILITY. | N/A | 4.10.A.2 | 3 |
| L.2 | Deletes explicit requirement for the affected reactor mode switch refuel position interlocks to be demonstrated OPERABLE by performance of a CHANNEL FUNCTIONAL TEST before resuming control rod withdrawal or CORE ALTERATION(s) following repair, maintenance, or replacement of any component that could affect the refuel position interlock, since SR 3.0.1 requires the appropriate SRs to be performed to demonstrate the OPERABILITY of the affected components. | N/A | 4.10.A.3 | 3 |
| L.3 | Adds actions to allow a control rod block to be inserted and to verify all control rods are fully inserted, in lieu of suspending in-vessel fuel movement when a required Refuel position equipment interlock is inoperable. | 3.9.1 Required Actions A.2.1 and A.2.2 | N/A | 4 |
| | | | | |
| 3.9.2, Refuel Position One-Rod-Out Interlock | | | | |
| L.1 | Deletes the requirement to "lock" the mode switch in Shutdown. | N/A | 3.10.A, 3.10.A Action 1, 4.10.A.1 | 8 |
| L.2 | Revises actions, with the one-rod-out interlock inoperable, to immediately suspend control rod withdrawal and initiate action to insert all insertable control rods in core cells containing one or more fuel assemblies. CTS requires CORE ALTERATIONS to be suspended and the reactor mode switch to be locked in Shutdown or Refuel. | 3.9.2 Required Actions A.1 and A.2 | 3.10.A Actions 1 and 2 | 5 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|------------------------------------|---|--------------------------|--------------------------|-------------|
| L.3 | Deletes the requirement to perform CTS 4.10.A.1.b "within 2 hours prior" and CTS 4.10.A.2 "within 24 hours prior to the start of" use of the component, since the normal 12 hour periodic Surveillance Frequency to verify the reactor mode switch is locked in the refuel position and the normal 7 day periodic Surveillance Frequency for the CHANNEL FUNCTIONAL TEST of the one-rod-out interlock provide adequate assurance of OPERABILITY. | N/A | 4.10.A.1.b, 4.10.A.2 | 3 |
| L.4 | Provides an allowance to enter the LCOs Applicability for a short time (1 hour) to provide adequate time to perform the required Surveillance. | SR 3.9.2.2 Note | N/A | 7 |
| L.5 | Deletes explicit requirement for the one-rod-out interlock to be demonstrated OPERABLE by performance of a CHANNEL FUNCTIONAL TEST before resuming control rod withdrawal or CORE ALTERATIONS following repair, maintenance, or replacement of any component that could affect the one-rod-out interlock, since SR 3.0.1 requires the appropriate SRs to be performed to demonstrate the OPERABILITY of the affected components. | N/A | 4.10.A.3 | 3 |
| | | | | |
| 3.9.3, Control Rod Position | | | | |
| L.1 | Revises the Applicability that all control rods be fully inserted in Operational MODE 5 during CORE ALTERATIONS to "when loading fuel assemblies into the core," since the intent is to establish the requirement that all control rods are inserted only in those situations that could add positive reactivity but are not covered by other Technical Specifications. In addition, the Actions have been revised consistent with the change in Applicability. | 3.9.3, 3.9.3 ACTION A | 3.10.C, 3.10.C Action | 2, 4 |
| L.2 | Deletes the requirement to perform CTS 4.10.C.2 "within 2 hours prior to the start of" Core Alterations since the normal 12 hour periodic Surveillance Frequency to verify the control rods are inserted provides adequate assurance of OPERABILITY. | N/A | 4.10.C.2 | 3 |
| | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|---|--|--------------------------|---|-------------|
| 3.9.4, Control Rod Position Indication | | | | |
| L.1 | Omits the position indication requirement in that no position indication is proposed to be required other than the full-in position indication. The OPERABILITY of the control rod "full-in" position indication for each control rod (whether the control rod is inserted or withdrawn) is proposed to be required to support OPERABILITY of the refueling interlocks and OPERABILITY of the one-rod-out interlock. In addition, the Surveillance Requirements have also been modified to be consistent with this concept (the full-in indicator only must be OPERABLE). The new Surveillance requires that each time a control rod is withdrawn from the full-in position, the full-in indication is indicating correctly (i.e., it is not indicating full-in when a control rod is withdrawn). The current requirements to verify the position of the control rod every 24 hours, that the control rod position changes during exercise tests, that the full-out indicator functions during rod coupling checks, and the full-in position indication checks prior to each reactor startup and each time a control rod is fully inserted, have been deleted. | LCO 3.9.4, SR 3.9.4.1 | 3.3.1, 3.3.1 Action 3, 4.3.1.1, 4.3.1.2 | 1, 3 |
| | | | | |
| 3.9.5, Control Rod OPERABILITY - Refueling | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.9.6, RPV Water Level - Irradiated Fuel | | | | |
| L.1 | Deletes the requirement to perform CTS 4.10.G "within 2 hours prior to the start of" handling fuel assemblies, since the normal 24 hour periodic Surveillance Frequency for verification of reactor vessel water level provides adequate assurance of OPERABILITY. | N/A | 4.10.G | 3 |
| | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|--|--|-------------|-------------|-------------|
| 3.9.7, RPV Water Level - New Fuel or Control Rods | | | | |
| L.1 | Splits current Specification 3.10.G, which provides reactor vessel water level requirements during handling of fuel assemblies and control rods within the reactor pressure vessel (RPV), into two Specifications. ITS 3.9.7 now provides the requirements for movement of new fuel assemblies and control rods within the RPV when irradiated fuel assemblies are seated within the RPV, with water level determined from the top of irradiated fuel assemblies seated within the RPV rather than from the top of the RPV flange as is in CTS 3.10.G. | LCO 3.9.7 | 3.10.G | 1 |
| L.2 | Deletes the requirement to perform CTS 4.10.G "within 2 hours prior to the start of" handling fuel assemblies or control rods, since the normal 24 hour periodic Surveillance Frequency for verification of reactor vessel water level provides adequate assurance of OPERABILITY. | N/A | 4.10.G | 3 |
| | | | | |
| 3.9.8, Residual Heat Removal (RHR) - High Water Level | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.9.9, Residual Heat Removal (RHR) - Low Water Level | | | | |
| L.1 | Revises the requirement of CTS 3/4.10.L to allow both pumps in the same loop OPERABLE instead of the current requirement to have a pump in each loop. CTS 3/4.10.L requires two shutdown cooling mode loops of the Residual Heat Removal (RHR) System to be OPERABLE with each loop consisting of at least one OPERABLE RHR pump and one OPERABLE RHR heat exchanger. ITS 3.9.9 requires two RHR shutdown cooling subsystems to be OPERABLE. To meet the LCO both pumps in one loop or one pump in each of the two loops must be OPERABLE. | 3.9.9 | 3/4.10.L | 1 |
| | | | | |

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|--|---------|-------------|-------------|-------------|
| Current Specification 3/4.10.E, Communications | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|--|---|--|--|-------------|
| 3.10.1, Reactor Mode Switch Interlock Testing | | | | |
| L.1 | ITS allows reactor mode switch interlock testing to be conducted in MODES 3, 4, and 5 if control rods are not fully inserted, provided these non-fully inserted control rods are in cells containing no fuel assemblies, in lieu of current requirement that all control rods remain fully inserted. | 3.10.1 | Table 1-2 footnote (a), 4.10.A.2 and 4.10.A.3 footnote (d) | 1 |
| | | | | |
| 3.10.2, Single Control Rod Withdrawal - Hot Shutdown | | | | |
| L.1 | Deletes the requirement to "lock" the reactor mode switch in Refuel. | N/A | 3.10.A, 4.10.A.1 | 8 |
| | | | | |
| 3.10.3, Single Control Rod Withdrawal - Cold Shutdown | | | | |
| L.1 | Deletes the requirement to "lock" the reactor mode switch in Refuel and the explicit requirement for the reactor mode switch to be OPERABLE. | N/A | 3.10.I.1, 4.10.I.1, 3.10.A, 3.10.A.1 | 1, 8 |
| L.2 | For removal of a control rod drive in Cold Shutdown, alternative requirements have been provided in ITS 3.10.3 in place of the SHUTDOWN MARGIN and control rod five-by-five array of disarming requirements of . The alternatives require all MODE 5 RPS Functions to be OPERABLE, MODE 5 requirements for LCO 3.3.8.2, RPS Electric Power Monitoring, and LCO 3.9.5, Control Rod OPERABILITY — Refueling, to be made applicable. In addition, an alternative requirement has been provided in place of the one-rod-out interlock requirement. The alternative will require a control rod withdrawal block to be inserted. New Surveillances have also been added to perform the applicable SRs for the required LCOs if RPS Functions, and control rod OPERABILITY requirements are chosen, and to verify every 24 hours that a control rod withdrawal block is inserted if the block is the chosen requirement. | LCO 3.10.3.b.2, LCO 3.10.3.c.1, SR 3.10.3.1, SR 3.10.3.4 | N/A | 1 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|---|---|-------------|----------------------|-------------|
| L.3 | Deletes the requirement to perform CTS 4.10.I "Within 4 hours prior to the start of removal of a control rod and/or the associated control rod drive mechanism from the core and/or reactor pressure vessel," since the normal 24 hour periodic Surveillance Frequency to verify the requirements of the LCO are met provides adequate assurance that the LCO requirements are satisfied. | N/A | 4.10.I | 3 |
| | | | | |
| 3.10.4, Single Control Rod Drive Removal - Refueling | | | | |
| L.1 | Deletes the requirement to "lock" the reactor mode switch in Shutdown or Refuel and the explicit requirement for the reactor mode switch to be OPERABLE. | N/A | 3.10.I.1, 4.10.I.1 | 1, 8 |
| L.2 | Deletes the requirement to perform CTS 4.10.I "Within 4 hours prior to the start of removal of a control rod and/or the associated control rod drive mechanism from the core and/or reactor pressure vessel," since the normal 24 hour periodic Surveillance Frequency to verify the requirements of the LCO are met provides adequate assurance that the LCO requirements are satisfied. | N/A | 4.10.I | 3 |
| | | | | |
| 3.10.5, Multiple Control Rod Withdrawal - Refueling | | | | |
| L.1 | The requirement "lock" the reactor mode switch in Shutdown or Refuel and the explicit requirement for the reactor mode switch to be OPERABLE. | N/A | 3.10.J.1, 4.10.J.1.a | 1, 8 |
| L.2 | Deletes the requirement to perform CTS 4.10.J "Within 4 hours prior to the start of removal of control rods and/or control rod drive mechanisms from the core and/or reactor pressure vessel," since the normal 24 hour periodic Surveillance Frequency to verify the requirements of the LCO are met provides adequate assurance that the LCO requirements are satisfied. | N/A | 4.10.J.1 | 3 |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|--|--|-----------------------------|-------------|-------------|
| L.3 | Deletes the explicit requirement for the performance of a functional test of the "one-rod-out Refuel position interlock" following replacement of all control rods and/or control rod drive mechanisms removed in accordance with CTS 3.10.J, if the function had been bypassed, since after restoration of a component that caused a required SR to be failed, SR 3.0.1 requires the appropriate SRs to be performed to demonstrate the OPERABILITY of the affected components. | N/A | 4.10.J.2 | 3 |
| | | | | |
| 3.10.6, Control Rod Testing - Operating | | | | |
| L.1 | Adds Special Operations Technical Specification to allow LCO 3.1.6, "Rod Pattern Control," to be suspended to allow performance of SDM testing, control rod scram time testing, and control rod friction testing, provided the analyzed rod position sequence requirements of SR 3.3.2.1.8 are changed to require the control rod sequence to conform to the specified test sequence; or the RWM is bypassed, the requirements of LCO 3.3.2.1, Function 2 are suspended, and conformance to the approved control rod sequence for the specified test is verified by a second licensed operator or other qualified member of the technical staff. These two requirements for the Special Operation effectively limit the potential amount and rate of reactivity increase that could occur during a control rod drop accident (CRDA). | 3.10.6 | N/A | 1 |
| | | | | |
| 3.10.7, SDM Test - Refueling | | | | |
| L.1 | Modifies the Surveillance Frequency to require the RWM verification to be performed in accordance with the applicable Surveillance requirements of the RWM Specification, and the CORE ALTERATION verification every 12 hours, instead of once within 30 minutes prior to the start of the SDM test | SR 3.10.7.2, SR 3.10.7.4 | 4.12.B | 3 |

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|---|---------|-------------|-------------|-------------|
| | | | | |
| Current Specification 3/4.12.A, Primary Containment Integrity | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 4.0 - DESIGN FEATURES**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|----------|---------|-------------|-------------|----------------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS**

| DOC # | SUMMARY | ITS SECTION | CTS SECTION | CHANGE TYPE |
|---------------------------------------|--|-------------|-------------|-------------|
| 5.1, Responsibility | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 5.2, Organization | | | | |
| L.1 | Deletes the requirement for an SRO to be present in the control room while the unit is in MODE 4. | N/A | 6.2.B.2 | 1 |
| | | | | |
| 5.3, Unit Staff Qualifications | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 5.4, Procedures | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 5.5, Programs and Manuals | | | | |
| LD.1 | Relaxation of Surveillance Frequency from 18 to 24 months for the requirement establishing a program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. | 5.5.2.b | 6.8.D.1.b | 10 |

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

| | | | | |
|-------------------------------------|---|--|---|------|
| LD.2 | Relaxation of Surveillance Frequency from 18 to 24 months for the requirements ensuring that the SGT System in-place charcoal adsorbers, HEPA filters, and heaters perform their safety function. | 5.5.7 | 4.7.P.2.a, 4.7.P.2.b, 4.7.P.2.c, 4.7.P.4.a, 4.7.P.4.c | 10 |
| LD.3 | Relaxation of Surveillance Frequency from 18 to 24 months for the requirements ensuring that in-place Control Room Emergency Ventilation System charcoal adsorbers, HEPA filters, and heaters are capable of performing their safety function. | 5.5.7 | 4.8.D.3.a, 4.8.D.3.b, 4.8.D.3.c, 4.8.D.5.a, 4.8.D.5.d | 10 |
| L.1 | Revises the requirements to allow 1) <u>new</u> fuel oil to meet either the ASTM standard for API gravity or absolute specific gravity; 2) the performance of a clear and bright appearance test with proper color <u>or</u> a water and sediment test; 3) "water and sediment" analyses of the <u>stored</u> fuel to be performed within 31 days after the addition of any new fuel oil; and 4) excluding, for bulk stored fuel oil, the 31 day requirement to verify "water and sediment" and "kinematic viscosity" and providing a limit for particulate contaminants of ≤ 10 mg/liter. | 5.5.9.a.1, 5.5.9.a.3, 5.5.9.b, 5.5.9.c, | 4.9.A.5.b, 4.9.A.6.b | 3 |
| | | | | |
| 5.6, Reporting Requirements | | | | |
| L.1 | Revises the requirement for submitting the Annual Radiological Environmental Operating Report and Radioactive Effluent Release Report from prior to May 1 and April 1 of each year, respectively, to by May 15 and prior to May 1 of each year, respectively. | 5.6.2, 5.6.3 | 6.9.A.3, 6.9.A.4 | 6 |
| | | | | |
| 5.7, High Radiation Area | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 6.4, Training | | | | |

**TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS**

| | | | | |
|--|------|------|------|------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 6.7, Safety Limit Violation | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 6.11, Radiation Protection Program | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 6.13, Process Control Program | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

CHANGE TYPE

1. Relaxation of the LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement
10. Relaxation of Surveillance Frequency from 18 months to 24 months

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
CHAPTER 1.0 - USE AND APPLICATION**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|--------------------------|----------------|---|----------|--|----------------|
| 1.0-LA.1 | 1.0 | Moves the definition of FRACTION OF RATED POWER (FRTP) and TRANSIENT LINEAR HEAT GENERATION RATE (TLHGR) to ITS 3.2.4 Bases. | Bases | Bases Control Process in ITS Chapter 5.0 | 1 |
| 1.0-LA.2 | 1.0 | Moves items a, b, c, and f from the PRIMARY CONTAINMENT INTEGRITY definition to the ITS 3.6.1.1 Bases and items b and e from the CTS SECONDARY CONTAINMENT INTEGRITY definition to the ITS 3.6.4.1 Bases. | Bases | Bases Control Process in ITS Chapter 5.0 | 1 |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
CHAPTER 2.0 - SAFETY LIMITS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|--------------------------|----------------|---------|----------|---------------------------|----------------|
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.0 - LCO AND SR APPLICABILITY**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|--------------------------|----------------|---------|----------|---------------------------|----------------|
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|---------------------------------------|---|---|----------|--|----------------|
| 3.1.1, SHUTDOWN MARGIN | | | | | |
| 3.1.1-LA.1 | 4.3.A.1, 4.3.A.3 | The details of the methods to determine SHUTDOWN MARGIN (SDM). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.1.2, Reactivity Anomalies | | | | | |
| 3.1.2-LA.1 | 3.3.B Action | The requirement to perform an analysis to determine and explain the cause of the reactivity difference. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.1.3, Control Rod OPERABILITY | | | | | |
| 3.1.3-LA.1 | 3.3.C Actions 1.a.2), 2.b, and 2.c, 3.3.H Action 1.b, 3.3.I Action 1.c | The details of the recommended procedures for disarming control rod drives. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.1.3-LA.2 | 3.3.I Actions 1.a and 1.b | Details of methods for determining the position of a control rod. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|--|----------------|---|----------|--|----------------|
| 3.1.4, Control Rod Scram Times | | | | | |
| 3.1.4-LA.1 | 4.3.D.3 | ITS SR 3.1.4.2 will test a "representative sample" of control rods each 120 days of power operation instead of the CTS requirement of "10% of the control rods on a rotating basis". The details of what constitutes a representative sample are relocated. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.1.5, Control Rod Scram Accumulators | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.1.6, Rod Pattern Control | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.1.7, Standby Liquid Control System | | | | | |
| 3.1.7-LA.1 | 4.4.A.2.b | The details of the method for performing the Surveillance to determine boron concentration is within limits (by a chemical analysis). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.1.7-LA.2 | 4.4.A.4.a | The details of the method for performing the Surveillance to verify flow through the SLC subsystem into the reactor pressure vessel (initiating an explosive valve). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|---|----------------------------|--|----------|---------------------------|----------------|
| 3.1.8, SDV Vent and Drain Valves | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| Current Specification 3/4.3.J, Control Rod Drive Housing Support | | | | | |
| None-L.1 NONE | 3/4.3.J NONE | Requirement for Control Rod Drive Housing Support to be in place. NONE | NONE | NONE | NONE |
| | | | | | |
| Current Specification 3/4.3.N, Economic Generation Control System | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |

NRC
This is in
L Table
not being
relocated,
ie, this is
a duplicate
entry

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.2 - POWER DISTRIBUTION LIMITS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|--|--------------------|--|----------|--|----------------|
| 3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE | | | | | |
| 3.2.1-LA.1 | 3.11.A Action 1 | The requirement in the CTS 3.11.A Action 1 to "initiate corrective action within 15 minutes" to restore the limit is relocated in the form of a discussion that "prompt action" should be taken to restore the parameter to within the limits. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.2.2, MINIMUM CRITICAL POWER RATIO | | | | | |
| 3.2.2-LA.1 | 3.11.C Action 1 | The requirement in the CTS 3.11.C Action 1 to "initiate corrective action within 15 minutes" to restore the limit is relocated in the form of a discussion that "prompt action" should be taken to restore the parameter to within the limits. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.2.3, LINEAR HEAT GENERATION RATE | | | | | |
| 3.2.3-LA.1 | 3.11.D Action 1 | The requirement in the CTS 3.11.D Action 1 to "initiate corrective action within 15 minutes" to restore the limit is relocated in the form of a discussion that "prompt action" should be taken to restore the parameter to within the limits. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.2.4, APRM GAIN AND SETPOINT | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.2 - POWER DISTRIBUTION LIMITS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|--------------------------|----------------------|--|----------|--|----------------|
| 3.2.4-LA.1 | 3.11.B Action | The requirement in the CTS 3.11.B Action to "initiate corrective action within 15 minutes" to restore the limit is relocated in the form of a discussion that "prompt action" should be taken to restore the parameter to within the limits. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.2.4-LA.2 | 3.11.B footnote a | The details in 3.11.B footnote a that describe that for GE fuel, MFLPD is substituted for FDLRC. | Bases | Bases Control Program in ITS Chapter 5 | 1 |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.3 - INSTRUMENTATION**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|-------------------------------------|---|--|----------|--|----------------|
| 3.3.1.1, RPS Instrumentation | | | | | |
| 3.3.1.1-LA.1 | 3.1.A Action footnotes a and b | The details relating to placing channels in trip (e.g, if tripping causes trip function to occur, tripping trip system with the most inoperable channels). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.3.1.1-LA.2 | Table 3.1.A-1 footnote (e) | The LPRM inputs for OPERABILITY of the APRM (2 per level; 50% of the LPRM inputs to each required APRM). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.3.1.1-LA.3 | 4.1.A-1 footnote (b) | Details of the methods for performing CTS 4.1.A.1, the IRM and APRM CHANNEL CHECK (½ decade overlap). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.3.1.1-LA.4 | Table 2.2.A-1 footnote (a) | The detail of system description for the APRM Flow-Biased Neutron Flux—High scram Allowable Value (the definition of W, the recirculation loop drive flow). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.3.1.1-LA.5 | Table 2.2.A-1 Functiona l Unit 4 | The details concerning the Allowable Value of the Reactor Vessel Water Level—Low Function (i.e., the Allowable Value is referenced to a level above the top of active fuel). | UFSAR | 10 CFR 50.59 | 1 |
| | | | | | |
| 3.3.1.2, SRM Instrumentation | | | | | |
| 3.3.1.2-LA.1 | 4.2.G.1 | The detail of the method for performing the Surveillance ("with the detector fully inserted"). | Bases | Bases Control Program in ITS Chapter 5 | 3 |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.3 - INSTRUMENTATION**

| | | | | | |
|---|---|---|---------------------------|---|------|
| 3.3.1.2-LA.2 | 3.10.B, 3.10.B.1, 4.10.B.1 | The details relating to SRM OPERABILITY; i.e., that the SRMs shall be inserted to the normal operating level with continuous indication in the control room. | Bases | Bases Control Program in ITS Chapter 5 | 1, 2 |
| 3.3.1.2-LA.3 | 3.10.B Applicability | The additional spatial limitations when movable detectors are being used. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.3.2.1, Control Rod Block Instrumentation | | | | | |
| 3.3.2.1-LA.1 | Table 3.2.E-1 footnote (a) | The statement that the RBM shall be automatically bypassed when a peripheral control rod is selected. | Bases UFSAR | Bases Control Program in ITS Chapter 5 10 CFR 50.59 | 1 |
| 3.3.2.1-LA.2 | Table 4.2.E-1 Function 1 Unit 1, footnote (c), 4.3.L.2.a, 4.3.L.2.b | Details of the methods for performing Surveillances (i.e., the RBM CFT includes the reactor manual control "relay select matrix" system input and the RWM CFT includes verifying correct indication of the selection error of at least one out-of-sequence control rod and verifying the rod block function). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.3.2.2, Feedwater System and Main Turbine High Water Level Trip Instrumentation | | | | | |
| 3.3.2.2-LA.1 | Table 3.2.J-1 footnote (a) | The detail concerning the Allowable Value for the Reactor Vessel Water Level — High Function (i.e., the Allowable Value is referenced to a level above the top of active fuel, and that the top of active fuel is defined to be 360 inches above vessel zero). | UFSAR | 10 CFR 50.59 | 1 |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.3 - INSTRUMENTATION**

| 3.3.3.1, Post Accident Monitoring Instrumentation | | | | | |
|--|--|--|--------------|---|----------|
| 3.3.3.1-LA.1 | Table 3.2.F-1 Action 61 | The use of alternate methods of monitoring (initiate the preplanned alternate method of monitoring the parameters). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.3.3.1-LA.2 | Table 4.2.F-1 footnote (a) | The detail of the method for performing the CHANNEL CALIBRATION of the Drywell Radiation Monitors. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.3.3.1-LA.3 | Table 3.2.F-1 (including footnote (a)) and 4.2.F-1 Instrumentation 14 | The Torus Pressure Function because it is shared with drywell pressure functions which are retained in ITS. | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| | | | | | |
| 3.3.4.1, ATWS-RPT Instrumentation | | | | | |
| 3.3.4.1-LA.1 | 3.2.C Action 2 footnote (a) | The details relating to placing channels in trip (e.g, if tripping causes trip function to occur). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.3.4.1-LA.2 | Table 3.2.C-1 footnote (c) | The detail concerning the Allowable Value for the Reactor Vessel Water Level — Low Low Function (i.e., the Allowable Value is referenced to a level above the top of active fuel, and that the top of active fuel is defined to be 360 inches above vessel zero). | UFSAR | 10 CFR 50.59 | 1 |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.3 - INSTRUMENTATION**

| 3.3.5.1, ECCS Instrumentation | | | | | |
|---|--|--|-------|--|---|
| 3.3.5.1-LA.1 | Table 3.2.B-1 footnote (h), Table 3.2.B-1 Functiona I Unit 3.d | The detail concerning the Allowable Values for the Reactor Vessel Water Level Functions (i.e., the Allowable Value is referenced to a level above the top of active fuel, and that the top of active fuel is defined to be 360 inches above vessel zero) and the detail that the Allowable Value for the HPCI Suppression Chamber Water Level - High Function is referenced above the bottom of the chamber. | UFSAR | 10 CFR 50.59 | 1 |
| 3.3.5.1-LA.2 | Table 3.2.B-1 footnote (i) | The detail relating to system design (e.g., valves associated with isolation signals). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| | | | | | |
| 3.3.5.2, RCIC System Instrumentation | | | | | |
| 3.3.5.2-LA.1 | Table 3.2.D-1 footnote (c), Table 3.2.D-1 Functiona I Unit 4 | The detail concerning the Allowable Values for the Reactor Vessel Water Level Functions (i.e., the Allowable Value is referenced to a level above the top of active fuel, and that the top of active fuel is defined to be 360 inches above vessel zero) and the detail that the Allowable Value for the RCIC Suppression Chamber Water Level - High Function is referenced above the bottom of the chamber. | UFSAR | 10 CFR 50.59 | 1 |
| 3.3.5.2-LA.2 | Table 3.2.D-1 footnote (b) | The detail relating to system design (e.g., valves associated with isolation signals). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| | | | | | |
| 3.3.6.1, Primary Containment Isolation Instrumentation | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.3 - INSTRUMENTATION**

| | | | | | |
|---|--------------------------------------|---|-------|--|---|
| 3.3.6.1-LA.1 | 3.2.A Action 2 footnote (a) | The details relating to placing channels in trip (e.g, if tripping causes trip function to occur). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.3.6.1-LA.2 | Table 3.2.A-1 footnote (j) | The detail concerning the Allowable Values for the Reactor Vessel Water Level Functions (i.e., the Allowable Value is referenced to a level above the top of active fuel, and that the top of active fuel is defined to be 360 inches above vessel zero). | UFSAR | 10 CFR 50.59 | 1 |
| 3.3.6.1-LA.3 | Table 3.2.A-1 footnote (f) | The detail in CTS that the Standby Liquid Control System Initiation Function channel closes only reactor water cleanup system isolation valves | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.3.6.1-LA.4 | Table 3.2.A-1 footnote (g) | The detail describing RHR system integrity (i.e., RHR system integrity is maintained provided the piping is intact and no maintenance is being performed that has the potential for draining the reactor vessel through the system). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.3.6.2, Secondary Containment Isolation Instrumentation | | | | | |
| 3.3.6.2-LA.1 | 3.2.A Action 2 footnote (a) | The details relating to placing channels in trip (e.g, if tripping causes trip function to occur). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.3.6.2-LA.2 | Table 3.2.A-1 footnote (j) | The detail concerning the Allowable Values for the Reactor Vessel Water Level Functions (i.e., the Allowable Value is referenced to a level above the top of active fuel, and that the top of active fuel is defined to be 360 inches above vessel zero). | UFSAR | 10 CFR 50.59 | 1 |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.3 - INSTRUMENTATION**

| | | | | | |
|---|---|---|-------|--|------|
| 3.3.6.2-LA.3 | Tables 3.2.A-1 and 4.2.A-1 footnote (c) | Details relating to system design (i.e., specific valves and systems affected). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.3.6.2-LA.4 | 4.7.P.4.b. 2) | The details in CTS 4.7.P.4.b.2 relating to methods for performing the LOGIC SYSTEM FUNCTIONAL TEST (use of simulated signals). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.3.6.3, Relief Valve Instrumentation | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.3.7.1, CREV System Isolation Instrumentation | | | | | |
| 3.3.7.1-LA.1 | 3.2.A Action 2 footnote (a) | The details relating to placing channels in trip (e.g, if tripping causes trip function to occur). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.3.7.1-LA.2 | Table 3.2.A-1 footnote (j) | The detail concerning the Allowable Values for the Reactor Vessel Water Level Functions (i.e., the Allowable Value is referenced to a level above the top of active fuel, and that the top of active fuel is defined to be 360 inches above vessel zero). | UFSAR | 10 CFR 50.59 | 1 |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.3 - INSTRUMENTATION**

| | | | | | |
|--|--|---|-------|--|------|
| 3.3.7.1-LA.3 | Table 3.2.A-1 footnote (k), Table 4.2.A-1 footnote (d) | Details relating to system design (i.e., specific system affected). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| | | | | | |
| 3.3.7.2, Mechanical Vacuum Pump Trip Instrumentation | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.3.8.1, Loss of Power Instrumentation | | | | | |
| 3.3.8.1-LA.1 | Table 3.2.B-1 Function 1 Unit 6.a | The detail relating to the methods (on decreasing voltage) for determining the 4160 V ESS Bus Undervoltage (Loss of Voltage) Allowable Value. | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| | | | | | |
| 3.3.8.2, RPS Electric Power Monitoring | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| Current Specification 3/4.2.H, Explosive Gas Monitoring | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| Current Specification 3/4.2.I, Suppression Chamber and Drywell Spray Actuation | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.3 - INSTRUMENTATION**

| | | | | | |
|---|------|------|------|------|------|
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| Current Specification 3/4.2.K, Toxic Gas Monitoring | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.4 - REACTOR COOLANT SYSTEM**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|---|--------------------------|--|----------------|---|----------------|
| 3.4.1, Recirculation Loops Operating | | | | | |
| 3.4.1-LA.1 | 4.6.A | The details relating to the recirculation pump MG set scoop tube stop settings. | TRM | 10 CFR 50.59 | 1 |
| 3.4.1-LA.2 | 3.6.A Action 2 | The requirement to "immediately initiate measures to place the unit in at least STARTUP" when no recirculation loops are in operation is relocated in the form of a discussion that "action must be taken as soon as practicable" to be in MODE 2. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.4.1-LA.3 | 3.6.A Action 1.b | The details of the actual MCPR correction factor for the MCPR operating limit for single loop operation ("0.01"). | COLR | COLR change control process described in Chapter 5 of the ITS | 3 |
| | | | | | |
| 3.4.2, Jet Pumps | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.4.3, Safety and Relief Valves | | | | | |
| 3.4.3-LA.1 | 3.6.E footnote (a) | The details relating to lift setting pressure of the safety valves (the lift setting pressure shall correspond to ambient conditions of the valves at nominal operating temperatures and pressures). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.4.3-LA.2 | 4.6.E.2 | The requirements for safety valve setting verification demonstrating the Reactor Coolant System (RCS) safety valves are OPERABLE. | IST Program | IST Program in ITS Chapter 5 | 3 |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.4 - REACTOR COOLANT SYSTEM**

| | | | | | |
|---|--|--|-------|--|------|
| 3.4.3-LA.3 | LCO 3.6.E footnote (b) LCO 3.6.F Footnote (a) | The detail relating to the lowest setting safety valve is a "Target Rock" combination safety relief valve and the detail that one of the five relief valves is a "Target Rock" combination safety relief valve | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.4.4, RCS Operational Leakage | | | | | |
| 3.4.4-LA.1 | 4.6.H.2 | Details of the method for performing the reactor coolant system leakage Surveillance (by determining the primary containment sump flow rate). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.4.5, RCS Leakage Detection Instrumentation | | | | | |
| 3.4.5-LA.1 | 4.6.H Note a | The detail that the primary containment atmospheric particulate radioactivity does not provide a means of quantifying leakage. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.4.6, RCS Specific Activity | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.4.7, RHR Shutdown Cooling System - Hot Shutdown | | | | | |
| 3.4.7-LA.1 | 3.6.O.1, 3.6.O.2 | The details of what constitutes an OPERABLE RHR shutdown cooling subsystem (i.e., each subsystem consists of an OPERABLE pump and heat exchanger) | Bases | Bases Control Program in ITS Chapter 5 | 1 |

Quad Cities 1 and 2

3.6.O
footnote (a)

and the detail in CTS 3.6.O
footnote (a) describing how the
system can be manually
aligned (remote or manual)

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.4 - REACTOR COOLANT SYSTEM

3.6.D Action 2

| | | | | | |
|--|--|--|-------|--|---|
| 3.4.7-LA.2 | 4.6.O | The detail of an acceptable method for circulating reactor coolant (i.e., a recirculation pump). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.4.8, RHR Shutdown Cooling System - Cold Shutdown | | | | | |
| 3.4.8-LA.1 | 3.6.P.1, 3.6.P.2, 3.6.P footnote (a) | The details of 1) what constitutes an OPERABLE RHR shutdown subsystem (i.e., each subsystem consists of an OPERABLE pump and heat exchanger) and 2) how the system can be aligned "remote or local." | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.4.8-LA.2 | 3.6.P Action 2, 4.6.P | The detail of an acceptable method for circulating reactor coolant (i.e., a recirculation pump). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.4.9, RCS Pressure and Temperature (P/T) Limits | | | | | |
| 3.4.9-LA.1 | 3.6.D Action, 4.6.D | The details relating to operational limits (loop flow) during a return to two recirculation pump operation from single recirculation loop operation. | UFSAR | 10 CFR 50.59 | 1 |
| 3.4.9-LA.2 | 3.6.K Action 2 | The detail to perform an engineering evaluation to determine the effects of the out-of-limit condition on the structural integrity of the reactor coolant system. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.4.9-LA.3 | 3.6.D | The detail on where the temperature is monitored (e.g., space or line) to determine the temperature differential between the reactor pressure vessel steam space coolant and the bottom head drain. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.4 - REACTOR COOLANT SYSTEM**

| 3.4.10, Reactor Steam Dome Pressure | | | | | |
|---|------|------|------|------|------|
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| Current Specification 3/4.6.N, Structural Integrity | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.5 - ECCS AND RCIC SYSTEM**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|------------------------------|---|--|----------|--|----------------|
| 3.5.1, ECCS-Operating | | | | | |
| 3.5.1-LA.1 | 3.5.A | The details relating to ECCS subsystem OPERABILITY (i.e., number of pumps and flow paths capable of taking suction from the suppression chamber and transferring water to the reactor vessel). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.5.1-LA.2 | 4.5.A.1.a. 2) footnote (a) | The details relating to what "correct position" means for an automatic valve. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.5.1-LA.3 | 4.5.A.1.b, 4.5.A.3.b. 1), 4.5.A.3.b. 2), 4.5.A.4.b | The details relating to methods for performing Surveillances (i.e., the minimum pressure to perform the low pressure HPCI flow test, verifying the HPCI System pump flow controller is in the correct position, verifying the HPCI suction is automatically transferred from the condensate storage tank to the suppression pool on the proper signals, and verifying proper operation of the ADS valves). | Bases | Bases Control Program in ITS Chapter 5 | 2, 3 |
| 3.5.1-LA.4 | 3.5.A footnote (e) | The description in CTS 3.5.A footnote (e), that one LPCI subsystem may be considered OPERABLE if capable of being manually realigned via "remote or local" methods. | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| | | | | | |
| 3.5.2, ECCS-Shutdown | | | | | |
| 3.5.2-LA.1 | 3/4.5.B, 3.5.C.2 | The details of CTS 3/4.5.B relating to system OPERABILITY (what constitutes an OPERABLE ECCS subsystem) and CTS 3.5.C.2 (reference for suppression chamber level). | Bases | Bases Control Program in ITS Chapter 5 | 1 |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.5 - ECCS AND RCIC SYSTEM**

| | | | | | |
|---------------------------|--------------------------|---|-------|--|---|
| 3.5.1-LA.2 | 3.5.B footnote (a) | The description in CTS 3.5.B footnote (e), that the LPCI may be considered OPERABLE if capable of being manually realigned via "remote or local" methods. | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| | | | | | |
| 3.5.3, RCIC System | | | | | |
| 3.5.3-LA.1 | 3.5.D | The details of CTS 3.5.D relating to system OPERABILITY (in this case that the RCIC System shall have a flow path capable of taking suction from the suppression pool and transferring water to the reactor pressure vessel). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.5.3-LA.2 | 4.5.D.1.c, 4.5.D.3.c | The details relating to methods for performing Surveillances (i.e., verifying that the RCIC pump controller is in the correct position and verifying the RCIC suction is automatically transferred from the condensate storage tank, known as the contaminated condensate storage tank in the ITS, to the suppression pool on the proper signal). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.5.3-LA.3 | 4.5.D.3.b | The 150 psig minimum pressure for performing the RCIC System flow test is relocated in the form of a discussion describing when adequate pressure is available to perform the test. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.6 - CONTAINMENT SYSTEMS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|--|-------------------|---|-------------|--|----------------|
| 3.6.1.1, Primary Containment | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.6.1.2, Primary Containment Air Lock | | | | | |
| 3.6.1.2-LA.1 | 3.7.C Action 2 | The purpose as to why an individual is dedicated to ensure the necessary administrative controls during entry and exit of personnel through an air lock with an inoperable air lock interlock mechanism are followed (i.e., "to assure that both air lock doors are not opened simultaneously"). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.6.1.3, Primary Containment Isolation Valves | | | | | |
| 3.6.1.3-LA.1 | 4.7.D.3 | The requirement to stroke time test the power operated, non-automatic, PCIVs. | IST Program | 10 CFR 50.59 and 10 CFR 50.55a | 3 |
| 3.6.1.3-LA.2 | 4.7.D.5.b | Requirements in CTS 4.7.D.5.b concerning the replacement charges for the traversing in-core probe (TIP) explosive valves (i.e., replacement charge shall be from the same batch or from another batch that has had one charge fired, and no charge shall remain in use past its shelf-life and operating-life). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.6.1.3-LA.3 | 4.7.D.6 | The details that the main steam isolation valve leakage is on a maximum pathway leakage basis and is tested "in accordance with the methods" of the Primary Containment Leakage Rate Testing Program. | Bases | Bases Control Program in ITS Chapter 5 | 3 |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.6 - CONTAINMENT SYSTEMS**

| | | | | | |
|---|------------------|--|-------|--|------|
| | | | | | |
| 3.6.1.4, Drywell Pressure | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.6.1.5, Drywell Air Temperature | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.6.1.6, Low Set Relief Valves | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.6.1.7, Reactor Building-to-Suppression Chamber Vacuum Breakers | | | | | |
| 3.6.1.7-LA.1 | 3.7.F | The detail comprising what "OPERABLE" means (i.e, closed). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| | | | | | |
| 3.6.1.8, Suppression Chamber-to-Drywell Vacuum Breakers | | | | | |
| 3.6.1.8-LA.1 | 4.7.E.2.c. 1) | The detail that the opening setpoint is verified from the closed position. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.6.2.1, Suppression Pool Average Temperature | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.6 - CONTAINMENT SYSTEMS**

| | | | | | |
|--|---------------------------|--|--------------|---|----------|
| | | | | | |
| 3.6.2.2, Suppression Pool Water Level | | | | | |
| 3.6.2.2-LA.1 | 3.5.C.1 | The detail that the suppression pool level limit is referenced from the bottom of the suppression chamber | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| | | | | | |
| 3.6.2.3, RHR Suppression Pool Cooling | | | | | |
| 3.6.2.3-LA.1 | 3.7.M | The details relating to system OPERABILITY (in this case the suppression pool cooling function is designated as two "independent" subsystems, each with a pump and flow path). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| | | | | | |
| 3.6.2.4, RHR Suppression Pool Spray | | | | | |
| 3.6.2.4-LA.1 | 3.7.L | The details relating to system OPERABILITY (in this case the suppression pool spray function is designated as two "independent" subsystems, each with a pump and flow path). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| | | | | | |
| 3.6.2.5, Drywell-to-Suppression Chamber Differential Pressure | | | | | |
| 3.6.2.5-LA.1 | 3.7.H footnote (a) | The detail that defines the types of required Surveillances ("which reduces the differential pressure") where the drywell-to-suppression chamber differential pressure can be outside of limits for 4 hours. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.6.3.1, Primary Containment Oxygen Concentration | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.6 - CONTAINMENT SYSTEMS**

| | | | | | |
|--|-----------------------------|---|-------|--|------|
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.6.4.1, Secondary Containment | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.6.4.2, Secondary Containment Isolation Valves | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.6.4.3, Standby Gas Treatment System | | | | | |
| 3.6.4.3-LA.1 | 3.7.P | The detail relating to system design (i.e., that the SGT subsystems are "independent") | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.6.4.3-LA.2 | 4.7.P.1, 4.7.P.4.b. 1 | Details of the methods for performing the standby gas treatment subsystem 31 day operating Surveillance (by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers) and the current manual actuation test requirement (verifying "Manual initiation from the control room"). | Bases | Bases Control Program in ITS Chapter 5 | 3 |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.7 - PLANT SYSTEMS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|--|----------------|--|----------|--|----------------|
| 3.7.1, Residual Heat Removal Service Water System | | | | | |
| 3.7.1-LA.1 <i>separately to the associated</i> | 3.8.A | The details relating to system OPERABILITY (that the RHRSW subsystems shall be independent and that each subsystem shall have two RHRSW pumps capable of taking suction from the ultimate heat sink and transferring the water to the associated RHR heat exchanger and safety related equipment). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.7.1-LA.2 | 3/4.8.A | LCO requirements, Actions, and Surveillance Requirements for the RHRSW System when in MODES 4 and 5 and when handling irradiated fuel in the secondary containment, CORE ALTERATIONS, and OPDRVs. | TRM | 10 CFR 50.59 | 3 |
| | | | | | |
| 3.7.2, Diesel Generator Cooling Water System | | | | | |
| 3.7.2-LA.1 | 3.8.B | The details relating to system OPERABILITY (that each DGCW subsystem shall have one OPERABLE DGCW pump, and an OPERABLE flow path capable of taking suction from the ultimate heat sink and transferring water to the associated diesel generator). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.7.2-LA.2 | 3/4.8.B | LCO requirements, Actions, and Surveillance Requirements for the DGCW System when in MODES or conditions other than MODE 1, 2, or 3. | TRM | 10 CFR 50.59 | 3 |
| 3.7.2-LA.3 | 4.8.B.2 | The detail concerning the specific start signal (start signal for the associated DG) to be used during the surveillance. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.7 - PLANT SYSTEMS**

| 3.7.3, Ultimate Heat Sink | | | | | |
|---|---------|---|-------|--|---|
| 3.7.3-LA.1 | 3.8.C | LCO requirements, Actions, and Surveillance Requirements for the Ultimate Heat Sink when in MODES or conditions other than MODE 1, 2, or 3. | TRM | 10 CFR 50.59 | 3 |
| | | | | | |
| 3.7.4, Control Room Emergency Ventilation System | | | | | |
| 3.7.4-LA.1 | 3.8.D | The details of what constitutes the Control Room Emergency Ventilation System (i.e, an Operable control room emergency filtration system). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.7.4-LA.2 | 4.8.D.2 | Details of the methods for performing the CREV System 31 day operating Surveillance (by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.7.5, Control Room Emergency Ventilation Air Conditioning System | | | | | |
| 3.7.5-LA.1 | 3.8.D | The details of what constitutes the Control Room Emergency Ventilation Air Conditioning System (i.e, an Operable refrigeration control unit). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| | | | | | |
| 3.7.6, Main Condenser Offgas | | | | | |
| 3.7.6-LA.1 | 4.8.I.1 | The requirement to continuously monitor radioactivity rate of noble gases from the main condenser air ejector. | ODCM | ODCM Control Process in ITS Chapter 5 | 3 |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.7 - PLANT SYSTEMS**

| | | | | | |
|--|---------------|--|-------|--|------|
| 3.7.6-LA.2 | 4.8.I.2 | Details defining the method for performing this Surveillance (i.e., performing an isotopic analysis of a representative sample of gases taken at the recombiner outlet, or the air ejector outlet, if the recombiner is bypassed). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.7.7, Main Turbine Bypass System | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.7.8, Spent Fuel Storage Pool Water Level | | | | | |
| 3.7.8-LA.1 | 3.10.H Action | The requirement to suspend crane operations with loads in the spent fuel storage pool area when the spent fuel storage pool water level is not within the limit. | UFSAR | 10 CFR 50.59 | 3 |
| 3.7.8-LA.2 | 3.10.H Action | Details of the methods for suspending movement of fuel assemblies (after placing the fuel assemblies in a safe condition). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.7.9, Safe Shutdown Makeup Pump System | | | | | |
| 3.7.9-LA.1 | 4.8.J.1.b | The detail relating to the method for performing Surveillance (i.e., by verifying that the Safe Shutdown Makeup Pump System pump controller is in the correct position). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| Current Specification 3/4.8.E, Flood Protection | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.7 - PLANT SYSTEMS**

| | | | | | |
|---|---------|--|------|--------------|------|
| | | | | | |
| Current Specification 3/4.8.F, Snubbers | | | | | |
| None-LA.1 | 3/4.8.F | Snubber inspection and testing requirements. | TRM | 10 CFR 50.59 | 3 |
| | | | | | |
| Current Specification 3/4.8.G, Sealed Source Contamination | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|--|--|---|----------|--|----------------|
| 3.8.1, AC Sources - Operating | | | | | |
| 3.8.1-LA.1 | LCO 3.9.A.1, LCO 3.9.A.2, LCO 3.9.A.2.c | The details relating to system design and OPERABILITY (i.e., that the offsite circuits are "physically independent," the DGs are "separate and independent," and that each DG has "a separate fuel transfer pump"). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.8.1-LA.2 | N/A | Not used. | N/A | N/A | N/A |
| 3.8.1-LA.3 | N/A | Not used. | N/A | N/A | N/A |
| 3.8.1-LA.4 | 4.9.A.8.i | The specific load value for the auto-connected loads. | UFSAR | 10 CFR 50.59 | 1 |
| | | | | | |
| 3.8.2, AC Sources - Shutdown | | | | | |
| 3.8.2-LA.1 | LCO 3.9.B.2.c | The detail relating to system design and OPERABILITY (i.e., that each DG has a fuel oil transfer pump). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.8.2-LA.2 | 3.9.B Action 1.d | Requirements to suspend crane operations over the spent fuel storage pool if fuel assemblies are stored therein when an AC Source is inoperable | UFSAR | 10 CFR 50.59 | 3 |
| | | | | | |
| 3.8.3, Diesel Fuel Oil and Starting Air | | | | | |
| 3.8.3-LA.1 | 4.9.A.10 | The 10 year requirement to drain, remove sediment, and clean each fuel tank. | TRM | 10 CFR 50.59 | 3 |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| 3.8.4, DC Sources - Operating | | | | | |
|-------------------------------|-----------------------------------|--|-------|--|---|
| 3.8.4-LA.1 | LCO 3.9.C.1, LCO 3.9.C.2 | Details relating to system OPERABILITY (what constitutes a DC Source division). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.8.4-LA.2 | 4.9.C footnote (a) | The detail that an alternate 125 volt battery shall adhere to these same Surveillance Requirements to be considered OPERABLE is relocated in the form of a discussion that states the alternate 125 VDC battery can be used to meet the requirements of the LCO. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.8.4-LA.3 | 4.9.C.4 | The details of the method (actual or simulated) to perform the battery service test. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.8.4-LA.4 | 4.9.C.6 | Specific limits on battery degradation and guidance regarding the intent of the term "degradation." | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.8.5, DC Sources - Shutdown | | | | | |
| 3.8.5-LA.1 | LCO 3.9.D.1, LCO 3.9.D.2 | Details relating to system OPERABILITY (what constitutes a required DC electrical power source). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 3.8.5-LA.2 | 4.9.D footnote (a) | The detail that an alternate 125 volt battery shall adhere to these same Surveillance Requirements to be considered OPERABLE is relocated in the form of a discussion that states the alternate 125 VDC battery can be used to meet the requirements of the LCO. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| 3.8.6, Battery Cell Parameters | | | | | |
|--|---|--|--------------|---|----------|
| 3.8.6-LA.1 | 4.9.C footnote (a) | The detail that an alternate 125 volt battery shall adhere to these same Surveillance Requirements to be considered OPERABLE is relocated in the form of a discussion that states the alternate 125 VDC battery can be used to meet the requirements of the LCO. | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.8.7, Distribution Systems - Operating | | | | | |
| 3.8.7-LA.1 | LCO 3.9.E, LCO 3.9.E.1, LCO 3.9.E.2, LCO 3.9.E.3, LCO 3.9.E.4, 3.9.E Actions 1 and 2 | The details relating to system design (the list of buses) and OPERABILITY (the buses are required to be energized). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| | | | | | |
| 3.8.8, Distribution Systems - Shutdown | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| | | | | | |
|------------|---|---|-------|--|---|
| 3.8.8-LA.1 | LCO 3.9.F, LCO 3.9.F.1, LCO 3.9.F.2, LCO 3.9.F.3, 3.9.F Action | The details relating to system design (the list of buses) and OPERABILITY (the buses are required to be energized). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.9 - REFUELING OPERATIONS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|---|------------------|--|----------|--|----------------|
| 3.9.1, Refueling Equipment Interlocks | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.9.2, Refuel Position One-Rod-Out Interlock | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.9.3, Control Rod Position | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.9.4, Control Rod Position Indication | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.9.5, Control Rod OPERABILITY - Refueling | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.9.6, RPV Water Level - Irradiated Fuel | | | | | |
| 3.9.6-LA.1 | 3.10.G Action | Details of the methods for suspending movement of fuel assemblies (after placing the fuel assemblies in a safe condition). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| 3.9.7, RPV Water Level - New Fuel or Control Rods | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.9 - REFUELING OPERATIONS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|---|-----------------------|--|----------|--|----------------|
| 3.9.7-LA.1 | 3.10.G Action | Details of the methods for suspending movement of fuel assemblies and control rods (after placing the fuel assemblies and control rods in a safe condition). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.9.8, Residual Heat Removal - High Water Level | | | | | |
| 3.9.8-LA.1 | 3.10.K.1, 3.10.K.2 | The details of what constitutes an OPERABLE RHR shutdown cooling subsystem (i.e., each subsystem consists of one OPERABLE RHR pump and heat exchanger). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.9.9, Residual Heat Removal - Low Water Level | | | | | |
| 3.9.9-LA.1 | 3.10.L.1, 3.10.L.2 | The details of what constitutes an OPERABLE RHR shutdown cooling subsystem (i.e., each subsystem consists of one OPERABLE RHR pump and heat exchanger). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| Current Specification 3/4.10.E, Communications | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.10 - SPECIAL OPERATIONS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|--|--|--|----------|--|----------------|
| 3.10.1, Reactor Mode Switch Interlock Testing | | | | | |
| 3.10.1-LA.1 | Table 1-2 footnote (a), 4.10.A.2, 4.10.A.3 | The method used to verify control rods remain fully inserted (by verification using a second licensed operator or other technically qualified member of the unit technical staff). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.10.2, Single Control Rod Withdrawal - Hot Shutdown | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.10.3, Single Control Rod Withdrawal - Cold Shutdown | | | | | |
| 3.10.3-LA.1 | 3.10.I.4.a, 4.10.I.4.a | The details of the recommended procedures for disarming control rods (i.e., electrically or hydraulically). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.10.4, Single Control Rod Drive Removal - Refueling | | | | | |
| 3.10.4-LA.1 | 3.10.I.4.a, 4.10.I.4.a | The details of the recommended procedures for disarming control rods (i.e., electrically or hydraulically). | Bases | Bases Control Program in ITS Chapter 5 | 3 |
| | | | | | |
| 3.10.5, Multiple Control Rod Withdrawal - Refueling | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.10 - SPECIAL OPERATIONS

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|---|----------------|---------|----------|---------------------------|----------------|
| | | | | | |
| 3.10.6, Control Rod Testing - Operating | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| 3.10.7, SDM Test - Refueling | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| Current Specification 3/4.12.A, Primary Containment Integrity | | | | | |
| None-M.1 | NONE | NONE | NONE | NONE | NONE |
| | | | | | |

NONE

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
CHAPTER 4.0 - DESIGN FEATURES

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|--------------------------|---------------------------|--|------------|---------------------------|----------------|
| 4.0-LA.1 | <i>N/A</i> | Not Used. | <i>N/A</i> | <i>N/A</i> | <i>N/A</i> |
| 4.0-LA.2 | 5.2.A, 5.2.B, 5.2.C | Primary containment configuration and design details, primary containment design temperatures and pressures, and secondary containment design details. | UFSAR | 10 CFR 50.59 | 1 |
| 4.0-LA.3 | 5.3.B | The nominal active control rod assembly absorber length. | UFSAR | 10 CFR 50.59 | 1 |
| | | | | | |



**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|----------------------------|---|--|-----------|---------------------------|----------------|
| 5.1, Responsibility | | | | | |
| 5.1-LA.1 | 6.1.A | Replaces the specific title "Station Manager" with the generic title "station manager" and relocates the specific title. | QA Manual | 10 CFR 50.54 | 3 |
| 5.1-LA.2 | 6.1.B | The requirement that delineates the responsibility of the Shift Manager for directing and commanding the overall operation of the facility on the shift. | UFSAR | 10 CFR 50.59 | 3 |
| | | | | | |
| 5.2, Organization | | | | | |
| 5.2-LA.1 | 6.2.A.2, 6.2.A.3, 6.2.B.6, 6.2.C | Replaces the specific title "Chief Nuclear Officer" with the generic term "a corporate officer." Replaces the specific title "Station Manager" with the generic title "station manager." Replaces the specific titles "Operations Manager" and "Shift Operations Supervisor" with the generic titles "operations manager" and "shift operations supervisor." Replaces the specific title, "Unit Supervisor" with "Shift Manager." The specific titles are relocated. In addition, the person to whom the STA provides advisory technical support will be changed to the shift manager instead of the unit supervisor. This portion is considered administrative. | QA Manual | 10 CFR 50.54 | 3 |
| 5.2-LA.2 | 6.2.B.5 | The details with respect to the development and implementation of procedures to limit the working hours of facility staff who perform safety-related functions. | UFSAR | 10 CFR 50.59 | 3 |
| 5.2-LA.3 | 6.2.B.2 | The details concerning the location of operators and senior operator. | UFSAR | 10 CFR 50.59 | 3 |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS**

| 5.3, Unit Staff Qualifications | | | | | |
|---------------------------------------|---|---|-------------|---------------|---|
| 5.3-LA.1 | 6.3 | Replaces the specific titles "Rad/Chem Superintendent" and "Lead Health Physicist" with the generic titles "radiation protection manager" and "lead radiation protection technician." The specific titles are relocated. | QA Manual | 10 CFR 50.54 | 3 |
| | | | | | |
| 5.4, Procedures | | | | | |
| 5.4-LA.1 | 6.8.A.5 | The requirement that written procedures for the PROCESS CONTROL PROGRAM (PCP) be established, implemented, and maintained. | UFSAR | 10 CFR 50.59 | 3 |
| | | | | | |
| 5.5, Programs and Manuals | | | | | |
| 5.5-LA.1 | 6.8.D.2 | The details contained in CTS 6.8.D.2, "In-Plant Radiation Monitoring." | UFSAR | 10 CFR 50.59 | 3 |
| 5.5-LA.2 | 4.0.E | Details of the Inservice Inspection (ISI) Program are relocated; and since the Inservice Testing Program is the only requirement remaining, the reference to ASME Code Class 1, 2, and 3 "components" has been changed to "pumps and valves" for clarity. | ISI Program | 10 CFR 50.55a | 3 |
| 5.5-LA.3 | 4.0.E | Details of the Inservice Testing Program. | IST Program | 10 CFR 50.55a | 3 |
| 5.5-LA.4 | 4.7.P.2.b, 4.7.P.3, 4.8.D.3.b, 4.8.D.4 | The details for implementing the Standby Gas Treatment (SGT) System and the Control Room Emergency Ventilation (CREV) System ventilation filter testing requirements. | TRM | 10 CFR 50.59 | 3 |
| 5.5-LA.5 | 3.8.H | The details for implementing the explosive gas mixture requirements. | TRM | 10 CFR 50.59 | 3 |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS**

| | | | | | |
|--|-------------------|---|-----------|--|------|
| 5.5-LA.6 | 6.14.A.2 | Replaces the specific title "Station Manager" with the generic title "station manager." The specific title is relocated. | QA Manual | 10 CFR 50.54 | 3 |
| 5.5-LA.7 | 6.8.D.1 | Details of the Reactor Coolant Sources Outside Primary Containment Program. | UFSAR | 10 CFR 50.59 | 3 |
| | | | | | |
| 5.6, Reporting Requirements | | | | | |
| 5.6-LA.1 | 6.9.A.6.a. (4) | The details associated with the MCPR Specification (i.e., scram insertion times, rated and of-rated flow  conditions). | Bases | Bases Control Program in ITS Chapter 5 | 1 |
| 5.6-LA.2 | 6.9.A.6.b | The details of the actual topical reports document date, revision number, volume, supplement and company.  | COLR | COLR change control process in ITS Chapter 5 | 1 |
| | | | | | |
| 5.7, High Radiation Area | | | | | |
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |
| Current Specification 6.4, Training | | | | | |
| None-LA.1 | 6.4 | The details on training and replacement training of station personnel. | UFSAR | 10 CFR 50.59 | 3 |
| | | | | | |
| Current Specification 6.7, Safety Limit Violation | | | | | |
| None-LA.1 | 6.7.A.1 | The requirement for notification of the Site Vice President or designated alternate. | QA Manual | 10 CFR 50.54 | 3 |
| | | | | | |

**TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS**

| Current Specification 6.11, Radiation Protection Program | | | | | |
|--|------|---|-------|--------------|---|
| None-LA.1 | 6.11 | The details on Radiation Protection Program procedures. | UFSAR | 10 CFR 50.59 | 3 |
| | | | | | |
| Current Specification 6.13, Process Control Program | | | | | |
| None-LA.1 | 6.13 | The details contained in the Process Control Program Specification and the definition of PROCESS CONTROL PROGRAM. | UFSAR | 10 CFR 50.59 | 3 |
| | | | | | |

CHANGE TYPE

1. Details of system design and system description including design limits
2. Description of system operation
3. Procedural details for meeting TS requirement, relocated reporting requirements and relocated specification requirements.

**TABLE R - RELOCATED SPECIFICATIONS
CHAPTER 1.0 - USE AND APPLICATION**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|--------------------------|----------------|---------|----------|---------------------------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
CHAPTER 2.0 - SAFETY LIMITS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS | CHANGE TYPE |
|--------------------------|----------------|---------|----------|---------------------------|----------------|
| NONE | NONE | NONE | NONE | NONE | NONE |
| | | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.0 - LCO AND SR APPLICABILITY**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|--------------------------|----------------|---------|----------|---------------------------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|--|----------------|---------|----------|---------------------------|
| 3.1.1, SHUTDOWN MARGIN | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.1.2, Reactivity Anomalies | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.1.3, Control Rod OPERABILITY | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.1.4, Control Rod Scram Times | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.1.5, Control Rod Scram Accumulators | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.1.6, Rod Pattern Control | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.1.7, Standby Liquid Control System | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|---|----------------|--|----------|---------------------------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.1.8, SDV Vent and Drain Valves | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.3.J, Control Rod Drive Housing Support | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.3.N, Economic Generation Control System | | | | |
| None-R.1 | 3/4.3.N | The Economic Generation Control System requirements. | TRM | 10 CFR 50.59 |
| | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.2 - POWER DISTRIBUTION LIMITS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|--|----------------|---------|----------|---------------------------|
| 3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.2.2, MINIMUM CRITICAL POWER RATIO | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.2.3, LINEAR HEAT GENERATION RATE | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.2.4, APRM GAIN AND SETPOINT | | | | |
| NONE | NONE | NONE | NONE | NONE |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.3 - INSTRUMENTATION**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|---|--|--|----------|---------------------------|
| 3.3.1.1, RPS Instrumentation | | | | |
| NONE | NONE | NONE | NONE | NONE |
| 3.3.1.2, SRM Instrumentation | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.3.2.1, Control Rod Block Instrumentation | | | | |
| 3.3.2.1-R.1 | Tables 3.2.E-1 and 4.2.E-1 Functional Units 2, 3, 4, and 5 | The APRM, SRM, IRM, and Scram Discharge Volume control rod blocks. | TRM | 10 CFR 50.59 |
| | | | | |
| 3.3.2.2, Feedwater System and Main Turbine High Water Level Trip Instrumentation | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.3.3.1, Post Accident Monitoring Instrumentation | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.3 - INSTRUMENTATION**

| | | | | |
|--|---|---|------|--------------|
| 3.3.3.1-R.1 | Tables 3.2.F-1 and 4.2.F-1 Instrument ation 7, 10, 11, and 13 | Drywell Air Temperature, Safety Relief Valve Position Indicators, Source Range Neutron Monitors, and Torus Air Temperature. | TRM | 10 CFR 50.59 |
| | | | | |
| 3.3.4.1, ATWS-RPT Instrumentation | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.3.5.1, ECCS Instrumentation | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.3.5.2, RCIC System Instrumentation | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.3.6.1, Primary Containment Isolation Instrumentation | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.3.6.2, Secondary Containment Isolation Instrumentation | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.3 - INSTRUMENTATION**

| 3.3.6.3, Relief Valve Instrumentation | | | | |
|--|---------|---|------|--------------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.3.7.1, CREV System Isolation Instrumentation | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.3.7.2, Mechanical Vacuum Pump Trip Instrumentation | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.3.8.1, Loss of Power Instrumentation | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.3.8.2, RPS Electric Power Monitoring | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.2.H, Explosive Gas Monitoring | | | | |
| None-R.1 | 3/4.2.H | Explosive Gas Monitoring Instrumentation requirements. | TRM | 10 CFR 50.59 |
| | | | | |
| Current Specification 3/4.2.I, Suppression Chamber and Drywell Spray Actuation | | | | |
| None-R.1 | 3/4.2.I | Suppression Chamber and Drywell Spray Actuation pressure Instrumentation requirements. | TRM | 10 CFR 50.59 |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.3 - INSTRUMENTATION**

| | | | | |
|--|----------------|--|------------|---------------------|
| | | | | |
| Current Specification 3/4.2.K, Toxic Gas Monitoring | | | | |
| None-R.1 | 3/4.2.K | Toxic Gas Monitoring System requirements. | TRM | 10 CFR 50.59 |
| | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.4 - REACTOR COOLANT SYSTEM**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|--|----------------|---------|----------|---------------------------|
| 3.4.1, Recirculation Loops Operating | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.4.2, Jet Pumps | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.4.3, Safety and Relief Valves | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.4.4, RCS Operational Leakage | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.4.5, RCS Leakage Detection Instrumentation | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.4.6, RCS Specific Activity | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.4.7, RHR Shutdown Cooling System - Hot Shutdown | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.4 - REACTOR COOLANT SYSTEM**

| | | | | |
|---|---------|---|------|--------------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.4.8, RHR Shutdown Cooling System - Cold Shutdown | | | | |
| NONE | NONE | NONE | NONE | NONE |
| 3.4.9, RCS Pressure and Temperature (P/T) Limits | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.4.10, Reactor Steam Dome Pressure | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.6.N, Structural Integrity | | | | |
| None-R.1 | 3/4.6.N | Structural integrity requirements for the ASME Code Class 1, 2, and 3 components. | TRM | 10 CFR 50.59 |
| | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.5 - ECCS AND RCIC SYSTEM**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|--------------------------|----------------|---------|----------|---------------------------|
| 3.5.1, ECCS-Operating | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.5.2, ECCS-Shutdown | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.5.3, RCIC System | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.6 - CONTAINMENT SYSTEMS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|--|----------------|---------|----------|---------------------------|
| 3.6.1.1, Primary Containment | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.1.2, Primary Containment Air Lock | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.1.3, Primary Containment Isolation Valves | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.1.4, Drywell Pressure | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.1.5, Drywell Air Temperature | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.1.6, Low Set Relief Valves | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.1.7, Reactor Building-to-Suppression Chamber Vacuum Breakers | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.6 - CONTAINMENT SYSTEMS**

| | | | | |
|--|---------|---------------------------------|------|--------------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.1.8, Suppression Chamber-to-Drywell Vacuum Breakers | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.2.1, Suppression Pool Average Temperature | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.2.2, Suppression Pool Water Level | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.2.3, RHR Suppression Pool Cooling | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.2.4, RHR Suppression Pool Spray | | | | |
| 3.6.2.4-R.1 | 3/4.7.L | The Drywell Spray requirements. | TRM | 10 CFR 50.59 |
| | | | | |
| 3.6.2.5, Drywell-to-Suppression Chamber Differential Pressure | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.6 - CONTAINMENT SYSTEMS**

| 3.6.3.1, Primary Containment Oxygen Concentration | | | | |
|---|------|------|------|------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.4.1, Secondary Containment | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.4.2, Secondary Containment Isolation Valves | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.6.4.3, Standby Gas Treatment System | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.7 - PLANT SYSTEMS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|--|----------------|---------|----------|---------------------------|
| 3.7.1, Residual Heat Removal Service Water System | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.7.2, Diesel Generator Cooling Water System | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.7.3, Ultimate Heat Sink | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.7.4, Control Room Emergency Ventilation System | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.7.5, Control Room Emergency Ventilation Air Conditioning System | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.7.6, Main Condenser Offgas | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.7.7, Main Turbine Bypass System | | | | |

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.7 - PLANT SYSTEMS

| | | | | |
|--|--------------------|---|----------------|-------------------------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.7.8, Spent Fuel Storage Pool Water Level | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.7.9, Safe Shutdown Makeup Pump System | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.8.E, Flood Protection | | | | |
| None-R.1 | 3/4.8.E | Flood Protection requirements. | TRM | 10 CFR 50.59 |
| | | | | |
| Current Specification 3/4.8.F, Snubbers | | | | |
| None-R.1 | 3/4.8.F | Snubber inspection and testing requirements. | TRM | 10 CFR 50.59 |
| NONE | | | NONE | |
| Current Specification 3/4.8.G, Sealed Source Contamination | | | | |
| None-R.1 | 3/4.8.G | Sealed Source Contamination requirements. | TRM | 10 CFR 50.59 |
| | | | | |

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**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|--|----------------|---------|----------|---------------------------|
| 3.8.1, AC Sources - Operating | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.8.2, AC Sources - Shutdown | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.8.3, Diesel Fuel Oil and Starting Air | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.8.4, DC Sources - Operating | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.8.5, DC Sources - Shutdown | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.8.6, Battery Cell Parameters | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.8.7, Distribution Systems - Operating | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.8 - ELECTRICAL POWER SYSTEMS**

| | | | | |
|--|------|------|------|------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.8.8, Distribution Systems - Shutdown | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.9 - REFUELING OPERATIONS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|--|----------------|---------|----------|---------------------------|
| 3.9.1, Refueling Equipment Interlocks | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.9.2, Refuel Position One-Rod-Out Interlock | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.9.3, Control Rod Position | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.9.4, Control Rod Position Indication | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.9.5, Control Rod OPERABILITY - Refueling | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.9.6, RPV Water Level - Irradiated Fuel | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.9.7, RPV Water Level - New Fuel or Control Rods | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.9 - REFUELING OPERATIONS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|--|----------------|--|----------|---------------------------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.9.8, Residual Heat Removal - High Water Level | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.9.9, Residual Heat Removal - Low Water Level | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.10.E, Communications | | | | |
| None-R.1 | 3/4.10.E | Communications requirements between the control room and refueling platform personnel. | TRM | 10 CFR 50.59 |
| | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.10 - SPECIAL OPERATIONS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|---|----------------|---------|----------|---------------------------|
| 3.10.1, Reactor Mode Switch Interlock Testing | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.10.2, Single Control Rod Withdrawal - Hot Shutdown | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.10.3, Single Control Rod Withdrawal - Cold Shutdown | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.10.4, Single Control Rod Drive Removal - Refueling | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.10.5, Multiple Control Rod Withdrawal - Refueling | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.10.6, Control Rod Testing - Operating | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 3.10.7, SDM Test - Refueling | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.10 - SPECIAL OPERATIONS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|---|----------------|---------|----------|---------------------------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 3/4.12.A, Primary Containment Integrity | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
CHAPTER 4.0 - DESIGN FEATURES**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|--------------------------|----------------|---------|----------|---------------------------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS**

| ITS SECTION AND DOC # | CTS SECTION | SUMMARY | LOCATION | CHANGE CONTROL PROCESS |
|--------------------------------|----------------|---------|----------|---------------------------|
| 5.1, Responsibility | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 5.2, Organization | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 5.3, Unit Staff Qualifications | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 5.4, Procedures | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 5.5, Programs and Manuals | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 5.6, Reporting Requirements | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| 5.7, High Radiation Area | | | | |

**TABLE R - RELOCATED SPECIFICATIONS
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS**

| | | | | |
|--|------|------|------|------|
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 6.4, Training | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 6.7, Safety Limit Violation | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 6.11, Radiation Protection Program | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |
| Current Specification 6.13, Process Control Program | | | | |
| NONE | NONE | NONE | NONE | NONE |
| | | | | |

Additional Draft SER Comments

1. This A DOC has been moved to the M Table. However, it is the position of Exelon that this change is Administrative, not More Restrictive. In addition, similar or identical Administrative changes in other Specifications were not moved to the M Table, but were maintained in the A Table. These are a) Dresden: ITS 3.1.1 DOC A.2, DOC A.4, and DOC A.6; ITS 3.4.9 DOC A.3; and ITS 3.9.8 DOC A.3; b) LaSalle: ITS 3.1.1 DOC A.2, DOC A.4, and DOC A.7; ITS 3.4.11 DOC A.3; ITS 3.7.4 DOC A.4; and ITS 3.9.8 DOC A.3; and c) Quad Cities: ITS 3.1.1 DOC A.2, DOC A.4, and DOC A.6; ITS 3.4.9 DOC A.3; and ITS 3.9.8 DOC A.3. Therefore, for consistency and to preclude any misunderstanding, it is requested that this A DOC remain in the A Table and not be moved to the M Table. In lieu of this, all of the above listed A DOCs should be moved to the M Table, and the Summary Section in the A Table should state "Moved to M Table" and the ITS and CTS Sections should state "N/A."
2. This A DOC has been moved to the M Table. However, it is the position of Exelon that this change is Administrative, not More Restrictive. In addition, similar Administrative changes in other Specifications were not moved to the M Table, but were maintained in the A Table. These are a) Dresden: ITS 3.3.1.1 DOC A.7; b) LaSalle: ITS 3.3.1.1 DOC A.9; and ITS 3.3.6.1 DOC A.9; and c) Quad Cities: ITS 3.3.1.1 DOC A.7. Therefore, for consistency and to preclude any misunderstanding, it is requested that this A DOC remain in the A Table and not be moved to the M Table. In lieu of this, all of the above listed A DOCs should be moved to the M Table, and the Summary Section in the A Table should state "Moved to M Table" and the ITS and CTS Sections should state "N/A."
3. This L DOC has been moved to the M Table. However, it is the position of Exelon that this change is Less Restrictive, not More Restrictive. When an airlock door is inoperable, the requirement to "maintain" the remaining Operable air lock door closed is an immediate action. By classifying this change as a More Restrictive change means that the NRC position is that the remaining Operable door can be left open for at least one hour (i.e., both doors could be open for at least 1 hour). In addition, similar Less Restrictive changes in other Specifications were not moved to the M Table, but were maintained in the L Table. These are a) Dresden: ITS 3.6.1.3 DOC L.3; and ITS 3.6.4.2 DOC L.2; b) LaSalle: ITS 3.6.1.3 DOC L.3; and ITS 3.6.4.2 DOC L.2; and c) Quad Cities: ITS 3.6.1.3 DOC L.3; and ITS 3.6.4.2 DOC L.2. Therefore, for consistency and to preclude any misunderstanding, it is requested that this L DOC remain in the L Table and not be moved to the M Table. In lieu of this, if it is the NRC's position that "maintain" is not an immediate action, then all of the above listed L DOCs should be moved to the M Table and the Summary Section in the L Table should state "Moved to M Table" and the ITS and CTS Sections should state "N/A."

Additional Draft SER Comments (continued)

4. This A DOC has been moved to the M Table. However, it is the position of Exelon that this change is Administrative, not More Restrictive. In addition, similar Administrative changes in other Specifications were not moved to the M Table, but were maintained in the A Table. These are a) Dresden: ITS 3.4.7 DOC A.5; b) LaSalle: ITS 3.4.9 DOC A.5; ITS 3.5.1 DOC A.4; and ITS 3.7.1 DOC A.2; and c) Quad Cities: ITS 3.4.7 DOC A.6; ITS 3.5.1 DOC A.4; and ITS 3.7.1 DOC A.3. Therefore, for consistency and to preclude any misunderstanding, it is requested that this A DOC remain in the A Table and not be moved to the M Table. In lieu of this, all of the above listed A DOCs should be moved to the M Table, and the Summary Section in the A Table should state "Moved to M Table" and the ITS and CTS Sections should state "N/A."
5. This L DOC has been moved to the LA Table. However, it is the position of Exelon that this change is a Less Restrictive change (L), not a removal of a detail to the ITS Bases change (LA). In addition, similar Less Restrictive changes in other Specifications were not moved to the LA Table, but were maintained in the L Table. These are LaSalle ITS 3.1.7 DOC L.3 and ITS 3.6.4.2 DOC L.4. Also, the summary of the change in the LA Table specifically states that the requirement is deleted, that the proposed ITS Surveillance does not include a restriction on plant conditions, and that some of the valves covered by this Surveillance can be adequately tested in a Mode other than Cold Shutdown or Refueling. Furthermore, the issued ITS Amendment will include a License Condition requiring the items listed in the LA Table be relocated to the locations specified in the LA Table. The LA Table discussion for this item is not specific as to what Exelon is required to relocate to the Bases. Therefore, for consistency and to preclude any misunderstanding or a failure on the part of Exelon to meet a new License Condition, it is requested that this L DOC remain in the L Table and not be moved to the LA Table.
6. This LA DOC has been moved to the R Table. However, it is the position of Exelon that while this change removes an entire Specification, it is removed for reasons other than not meeting the criteria of 10 CFR 50.36(c)(2)(ii). The Decay Time Specification meets criterion 2, as stated in the Exelon ITS submittal as well as the draft NRC SER Section E. Therefore, the change cannot be classified as an R change. In addition, it is noted by Exelon that this change was not listed as an R change in the NRC SER for the most recent BWR/5 ITS amendment (Nine Mile Point Unit 2). Furthermore, the NRC documented in a letter dated May 9, 1988 from T.E. Murley (NRC) to R.F. Janecek (BWROG), that the Decay Time Specification meets Criterion 2 (Appendix D, page D-10). Therefore, for accuracy with the Exelon statements and consistency with 10 CFR 50.36(c)(2)(ii), it is requested that this LA DOC remain in the LA Table and not be moved to the R Table or discussed in the R Section of the SER (Section E).