

Table A – Administrative Changes
ITS Section 3.5 – Emergency Core Cooling Systems (ECCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5.1 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.5.1 A.2	CTS LCO 3.5.1 states each reactor coolant system accumulator shall be OPERABLE and states accumulator requirements that must be met for each accumulator to be OPERABLE. ITS LCO 3.5.1 states three accumulators shall be OPERABLE. This changes CTS by moving the specific accumulator requirements to Surveillances.	3.5.1	3.5.1
3.5.1 A.3	CTS 3.5.1 does not contain a specific ACTION for two or more accumulators inoperable. With two or more accumulators inoperable, CTS 3.0.3 would be entered. ITS 3.5.1 ACTION D directs entry into LCO 3.0.3 when two or more accumulators are inoperable.	3.5.1 Action D	3.0.3
3.5.1 A.4	CTS Surveillance 4.5.1.b requires the accumulator boron concentration to be verified after each solution volume increase of $\geq 5\%$ of accumulator tank volume. ITS SR 3.5.1.4 Frequency includes a Note clarifying that this boron concentration verification need only be performed on the affected accumulator.	SR 3.5.1.4 Note	4.5.1.b
3.5.1 A.5	CTS 3.5.1 Applicability is modified by a Note restricting the MODE 3 applicability to when pressurizer pressure above 1000 psig. ITS 3.5.1 Applicability restricts MODE 3 applicability to when RCS pressure is above 1000 psig.	3.5.1	3.5.1 Note

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DOC No.		Description of Change	ITS Requirement	CTS Requirement
3.5.1	A.6	CTS 3.5.1, Action a states that if an inoperable accumulator is not restored to OPERABLE status within one hour, the unit must be placed in HOT SHUTDOWN within the next 12 hours. CTS 3.5.1, Action b states that with one accumulator inoperable due to the isolation valve being closed, if the valve is not immediately opened, the unit be in HOT STANDBY within one hour, and HOT SHUTDOWN within the next 12 hours. CTS 3.0.1 states that the LCO and Action requirements are applicable during the Operational MODEs or other conditions specified for each Specification. RCS pressure is not part of the definition of HOT STANDBY or HOT SHUTDOWN in the CTS or MODE 3 or MODE 4 in the ITS. The Applicability of CTS 3.5.1 is MODES 1, 2, and MODE 3 with pressurizer pressure > 1000 psig, so the LCO and Actions become not applicable in MODE 3 with pressurizer pressure ≤ 1000 psig, and entry into HOT SHUTDOWN (MODE 4) is not required. ITS 3.5.1, ACTION B.1 requires that with one accumulator inoperable for reasons other than boron concentration not within limits, that the accumulator be restored to OPERABLE status within one hour. If the accumulator is not restored to OPERABLE status within one hour, ITS 3.5.1 Action C.1 requires entry into MODE 3 within 6 hours, and Action C.2 requires RCS pressure be ≤ 1000 psig within 12 hours. This changes the CTS by replacing the requirement to be in HOT SHUTDOWN within 13 hours of the inoperability with a requirement to reduce RCS pressure to ≤ 1000 psig while in MODE 3 within 13 hours. Reducing pressurizer pressure to ≤ 1000 psig while in MODE 3 in the CTS would remove the unit from the MODE of Applicability, and placing the unit in MODE 4 would not be required, making the Required Actions of the CTS and ITS the same, though described differently. The addition of the 6 hour time limit to be in MODE 3 is described in Discussion of Change M.1.	3.5.1	3.5.1
3.5.1	A.7	CTS 4.5.1.1.b requires each accumulator be demonstrated OPERABLE, “At least once per 31 days and within 6 hours after each solution volume increase of greater than or equal to 5% of tank volume by verifying the boron concentration of the accumulator solution.” ITS SR 3.5.1.4 requires verifying boron concentration every 31 days and once within 6 hours after each solution volume increase of ≥ 50% of indicated level that is not the result of addition from the refueling water storage tank. This changes CTS by changing the parameter value of solution volume increase of greater than or equal to 5% of tank volume to solution volume increase of ≥ 50% of indicated level. Changes associated with adding the criteria that the verification is not required when the volume increase is the result of addition from the refueling water storage tank is addressed by DOC L.4.	SR 3.5.1.4	4.5.1.1.b

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DOC No.		Description of Change	ITS Requirement	CTS Requirement
3.5.2	A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.5.3	A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.5.3	A.2	CTS Surveillance 4.5.3.1 states that the ECCS subsystem shall be demonstrated OPERABLE per the applicable Surveillance Requirements of 4.5.2. ITS SR 3.5.3.1 states the specific Surveillances in Specification 3.5.2 which must be performed.	SR 3.5.3.1	4.5.3.1
3.5.4	A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.5.4	A.2	CTS LCO 3.5.5 contains a list of requirements that must be met for the Refueling Water Storage Tank (RWST) to be OPERABLE. ITS LCO 3.5.4 still requires the RWST to be OPERABLE, but the requirements for OPERABILITY are moved to the Surveillances.	SRs 3.5.4.1, 3.5.4.2 and 3.5.4.3	3.5.5
3.5.5	A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.5.5	A.2	CTS 3.4.6.2 Action b states that with any RCS leakage greater than the controlled leakage rate, reduce the leakage rate to within limits within 4 hours. ITS 3.5.5 Action A states with seal injection flow not within limit, adjust manual seal injection throttle valves to give a flow within limit with RCS pressure ≥ 2215 psig and ≤ 2255 psig and the seal injection modulating valve full open within 4 hours. This changes CTS by providing more detail for the Action.	3.5.5 Action A	3.4.6.2 Action b
3.5.6	A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various

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DOC No.		Description of Change	ITS Requirement	CTS Requirement
3.5.6	A.2	CTS LCO 3.5.4.1 contains a list of requirements that must be met for the Boron Injection Tank (BIT) to be OPERABLE. ITS LCO 3.5.6 requires the BIT to be OPERABLE, but the requirements for OPERABILITY are moved to Surveillances.	SRs 3.5.6.1, 3.5.6.2 and 3.5.6.3	3.4.5.1

Table L – Less Restrictive Changes
ITS Section 3.5 – Emergency Core Cooling Systems (ECCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.5.1 L.1	The CTS 3.5.1 Applicability is MODES 1, 2, and 3. The MODE 3 applicability is modified by a footnote that states, "Pressurizer Pressure above 1000 psig. Power lock out of valves is not permitted in MODE 3 when below 1000 psig." The ITS 3.5.1 Applicability is MODES 1 and 2, and MODE 3 with RCS pressure > 1000 psig. This changes the CTS by eliminating the CTS Applicability statement, "Power lock out of valves is not permitted in MODE 3 when below 1000 psig."	3.5.1 Applicability	3.5.1 Applicability	2
3.5.1 L.2	CTS 3.5.1 Action a states that an inoperable accumulator must be restored to OPERABLE status within one hour, except as a result of a closed isolation valve. ITS 3.5.1 ACTION A.1 states that if one accumulator is inoperable due to boron concentration not within limits, it must be restored to OPERABLE status within 72 hours. This changes CTS by increasing the time one accumulator may be inoperable due to boron concentration not within limits from 1 hour to 72 hours.	3.5.1 Action A.1	3.5.1 Action a	3
3.5.1 L.3	CTS 3.5.1, Action b, requires that a unit be in HOT STANDBY within 1 hour and HOT SHUTDOWN within the next 12 hours when an accumulator is inoperable due to a closed accumulator isolation valve. ITS LCO 3.5.1 states that if an accumulator is inoperable for any reason other than an out of limit boron concentration, the accumulator must be restored to OPERABLE status within one hour. If the accumulator is not restored to OPERABLE status within one hour, the unit must be in MODE 3 in 6 hours and MODE 3 with RCS pressure ≤ 1000 psig in 12 hours. This changes the CTS by extending the time to enter MODE 3 with a closed accumulator isolation MOV from 1 hour to 7 hours. The time to exit the Applicability remains 13 hours from the time of the inoperability, and is addressed by Discussion of Change A.6.	3.5.1	3.5.1 Action b	3

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.5 – Emergency Core Cooling Systems (ECCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.5.1 L.4	CTS Surveillance 4.5.1.c requires that the accumulator boron concentration be verified at least once per 31 days and within 6 hours after each solution volume increase of $\geq 5\%$ of tank volume. ITS SR 3.5.1.4 contains the same requirements, but it will not require the boron concentration to be measured if the solution volume increase was made from the Refueling Water Storage Tank (RWST).	SR 3.5.1.4	4.5.1.c	7
3.5.1 L.5	CTS Surveillance 4.5.1.d requires verification every 18 months that each accumulator isolation MOV opens automatically when RCS pressure exceeds 2010 psig and on receipt of a safety injection test signal. The ITS does not contain that requirement.	None	4.5.1.d	5
3.5.1 L.6	CTS Surveillance 4.5.1.c requires verification that the breaker supplying power to the accumulator isolation MOV is locked in the off position at least every 31 days when the RCS pressure is above 2000 psig. ITS SR 3.5.1.5 requires verification that power is removed from each accumulator isolation MOV at least every 31 days when the RCS pressure is above 2000 psig. This changes the CTS by not specifying in what manner electrical power is removed from the valve.	SR 3.5.1.5	4.5.1.c	6
3.5.2 L.1	CTS 4.5.2.e.1 and 4.5.2.e.2 require verification of the automatic actuation of ECCS components on a safety injection test signal. ITS SR 3.5.2.5 and SR 3.5.2.6 state that automatic actuation of ECCS components may be performed with an actual or simulated actuation signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test. The change from “safety injection” to “actuation” is discussed in LA.6.	SR 3.5.2.5 and 3.5.2.6	4.5.2.e.1 and 4.5.2.e.2	6

Change Category:
1 - Relaxation of LCO Requirements
2 - Relaxation of Applicability
3 - Relaxation of Completion Time
4 - Relaxation of Required Action
5 - Deletion of Surveillance Requirement
6 - Relaxation Of Surveillance Requirement Acceptance Criteria
7 - Relaxation Of Surveillance Frequency
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Table L – Less Restrictive Changes
ITS Section 3.5 – Emergency Core Cooling Systems (ECCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.5.2 L.2	CTS 3.5.2 Action a states that when one ECCS train is inoperable, it must be returned to OPERABLE status within 72 hours. ITS 3.5.2 Action A states that when one or more trains are inoperable, restore the trains to OPERABLE status within 72 hours. ITS 3.5.2, Action C states that with less than 100% of the ECCS flow equivalent to a single OPERABLE ECCS train available, enter LCO 3.0.3 immediately. This changes the CTS by allowing combinations of equipment from each train to be credited as meeting the ECCS safety function provided 100% of the ECCS flow equivalent to a single OPERABLE ECCS train is available. For example, under the CTS an inoperable HHSI pump in one train and an inoperable low head safety injection (LHSI) pump in the other train would require a 3.0.3 entry. Under the ITS, the same condition would allow 72 hours before requiring a shutdown because the remaining OPERABLE HHSI pump and LHSI pump are capable of producing the flow equivalent to a single OPERABLE train.	3.5.2 Actions A and C	3.5.2 Action a	4
3.5.2 L.3	CTS 3.5.2 Action b requires that a Special Report be prepared and submitted to the NRC within 90 days following an ECCS actuation that results in water being injected into the Reactor Coolant System. The report is to include the total accumulated actuation cycles to date. ITS 3.5.2 does not include this requirement.	None	3.5.2 Action b	8
3.5.2 L.4	CTS 4.5.2.g.1 and 4.5.2.h describe tests that must be performed following repositioning of valves, maintenance, or modification to the ECCS. The ITS does not include these testing requirements.	None	4.5.2.g.1 and 4.5.2.h	5

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

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DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.5.2 L.5	CTS Surveillance 4.5.2.d.1 requires a visual inspection of the containment sump and verification that the subsystems suction inlets are not restricted by debris and that the sump components (trash racks, screens, etc.) show no evidence of structural distress or corrosion. ITS SR 3.5.2.8 contains the same requirements, but it is only necessary to verify that the sump components show no evidence of abnormal corrosion. This changes CTS by only requiring verification of no abnormal corrosion versus corrosion.	SR 3.5.2.8	4.5.2.d.1	6
3.5.2 L.6	CTS 4.5.2.e.1 requires verification that ECCS automatic valves actuate to their correct position. ITS SR 3.5.2.5 requires verification that ECCS automatic valves in the flow path that are not locked, sealed or otherwise secured in position, actuate to the correct position on an actual or simulated actuation signal. This changes the CTS by excluding those valves that are locked, sealed, or otherwise secured in position from the verification.	SR 3.5.2.5	4.5.2.e.1	6
3.5.2 L.7	CTS Surveillance 4.5.2.g requires verification that specified manual valves are locked and tagged in the proper position for injection. ITS SR 3.5.2.7 requires verification that the specified ECCS throttle valves are secured in the correct position. This changes the CTS by not specifying that the valves be verified locked and tagged.	SR 3.5.2.7	4.5.2.g	6
3.5.2 L.8	ITS 3.5.2 LCO Note states, “In MODE 3, both safety injection (SI) flow paths may be isolated by closing the isolation valves for up to 2 hours to perform pressure isolation valve testing per SR 3.4.14.” CTS 3.5.2 does not include such a Note. This changes the CTS by allowing both trains of ECCS to be inoperable in MODE 3 for up to 2 hours for required pressure isolation valve testing per 3.4.14.1.	LCO 3.5.2 Note	None	1

- Change Category:
1 - Relaxation of LCO Requirements
2 - Relaxation of Applicability
3 - Relaxation of Completion Time
4 - Relaxation of Required Action
5 - Deletion of Surveillance Requirement
6 - Relaxation Of Surveillance Requirement Acceptance Criteria
7 - Relaxation Of Surveillance Frequency
8 - Deletion of Reporting Requirements

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DOC No.		Description of Change	ITS Requirement	CTS Requirement	Change Type
3.5.3	L.1	CTS 3.5.3, Action c requires that a Special Report be prepared and submitted to the NRC within 90 days following an ECCS actuation that results in water being injected into the Reactor Coolant System. The report is to include the total accumulated actuation cycles to date. ITS 3.5.3 does not include this requirement.	None	3.5.3 Action c	8
3.5.3	L.2	CTS 3.5.3 Action a allows 20 hours to reach MODE 5 when a HHSI pump or its flow path from the refueling water storage tank is inoperable. ITS 3.5.3 Action B allows 24 hours to reach MODE 5. This change the CTS by extending the Completion Time from 20 to 24 hours.	3.5.3 Action B	3.5.3 Action a	3
3.5.4	L.1	The CTS 3.5.5 Action allows 1 hour to restore an inoperable RWST. ITS LCO 3.5.4, Action A allows 8 hours to restore the RWST to OPERABLE status if the inoperability is due to the RWST boron concentration or temperature not within limits. This changes CTS by increasing the Completion Time for the specified Conditions from 1 hour to 8 hours.	3.5.4 Action A	3.5.5	3
3.5.5	L.1	CTS 3.4.6.2.e is applicable in MODES 1, 2, 3 and 4. If the requirements of the LCO are not met, Action b requires entering MODE 5 (Cold Shutdown) within 30 hours. ITS 3.5.5 is applicable in MODES 1, 2, and 3. If the requirements of LCO are not met, Action B requires entering MODE 4 in 12 hours. This changes the CTS by deleting MODE 4 from the MODES of Applicability and making corresponding changes to the ACTIONS and Completion Times.	3.5.5	3.4.6.2.e	2
3.5.5	L.2	CTS Surveillance 4.4.6.2.1.c requires measurement of the RCP seal injection flow when RCS pressure is 2235 ± 20 psig. ITS SR 3.5.5.1 will allow 4 hours to perform the Surveillance after RCS pressure stabilizes ≥ 2215 psig and ≤ 2255 psig. This changes the CTS by allowing 4 hours after RCS pressure is stabilized at normal operating pressure to perform the Surveillance.	SR 3.5.5.1	4.4.6.2.1.c	7

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
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DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.5.6 None	N/A	N/A	N/A	N/A

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table M – More Restrictive Changes
ITS Section 3.5 – Emergency Core Cooling Systems (ECCS)

DOC No.		Description of Change	ITS Requirement	CTS Requirement
3.5.1	M.1	CTS 3.5.1, Action a states that if an inoperable accumulator is not restored to OPERABLE status within one hour, the unit must be placed in HOT SHUTDOWN within the next 12 hours, but does not include a time by which the unit must be placed in MODE 3. ITS 3.5.1, Action C.1 requires entry into MODE 3 within 6 hours. This changes the CTS by adding a 6 hour time limit to be in MODE 3.	3.5.1 Action C.1	3.5.1 Action a
3.5.2	M.1	CTS 3.5.2 Action a requires, when one ECCS subsystem is inoperable, the subsystem be restored to OPERABLE status within 72 hours or the unit be in HOT SHUTDOWN within the next 12 hours. ITS 3.5.2 Action A requires an inoperable ECCS train be returned to OPERABLE status in 72 hours. ITS 3.5.2 Action B requires the unit to be placed in MODE 3 within 6 hours and MODE 4 within 12 hours if the Required Action and Completion Time for ITS Action A are not met. This changes the CTS by requiring entry into MODE 3 within 6 hours.	3.5.2 Actions A and B	3.5.2 Action a
3.5.2	M.2	CTS 3.5.2, Action c states that the provisions of Specification 3.0.4 are not applicable for one hour following heatup over 235 °F (270 °F Unit 2) or prior to cooldown below 235 °F (270 °F Unit 2). ITS 3.5.2 does not include this allowance.	None	3.5.2 Action c
3.5.2	M.3	ITS SR 3.5.2.3 requires verification that ECCS piping is sufficiently full of water every 92 days. CTS does not contain such a requirement. This changes the CTS by adding a Surveillance Requirement.	SR 3.5.2.3	None
3.5.2	M.4	Unit 1 CTS LCO 3.5.2 states that two independent ECCS subsystems shall be OPERABLE and an OPERABLE flow path must be capable of taking suction from the refueling water storage tank, the containment sump, or from the discharge of the outside recirculation spray pump. The ITS moves the details of what constitutes an OPERABLE subsystem to the Bases, but these details do not include the option to take suction from the discharge of the outside recirculation spray pump. This changes the CTS by eliminating the option of an OPERABLE ECCS subsystem taking suction from the discharge of an outside recirculation spray pump.	None	Unit 1 3.5.2

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DOC No.		Description of Change	ITS Requirement	CTS Requirement
3.5.3	M.1	CTS 3.5.3, Action b applies when the required Low Head Safety Injection (LHSI) pump is inoperable. It directs that at least one ECCS subsystem be restored to OPERABLE status or RCS T _{avg} be maintained less than 350 °F by use of alternate heat removal methods. Action a applies to an ECCS train inoperable due to either the HHSI pump or the flow path from the refueling water storage tank. The ITS will not contain CTS 3.5.3 Action B and ITS 3.5.3 Action A will not include the exclusion regarding an ECCS inoperability due to the inoperability of either the HHSI pump or the flow path from the RWST, and will apply to all inoperabilities of the required ECCS train. This changes CTS by changing the Completion Time for a LHSI subsystem inoperable in MODE 4 from no specified time to restore OPERABILITY to one hour. In addition, the ITS requires that the plant be in MODE 5 within 24 hours when a LHSI subsystem is inoperable and not restored within 1 hour instead of remaining in MODE 4 as allowed by the CTS.	3.5.3 Action A	3.5.3 Action b
3.5.4	None	N/A	N/A	N/A
3.5.5	None	N/A	N/A	N/A
3.5.6	None	N/A	N/A	N/A

Table R – Relocated Specifications and Removed Details
ITS Section 3.5 – Emergency Core Cooling Systems (ECCS)

DOC No.		CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.5.1	None	N/A	N/A	N/A	N/A	N/A
3.5.2	LA.1	3.5.2, 4.5.2.e.2	CTS LCO 3.5.2 states that two ECCS subsystems shall be OPERABLE and contains a description of what constitutes an OPERABLE subsystem. The Unit 1 LCO also describes the capability of the outside recirculation spray pump to discharge to the ECCS subsystems (acting as a backup to the Low Head Safety Injection pump) during the recirculation phase of a LOCA. CTS Surveillance 4.5.2.e.2 lists the pumps that are included in an OPERABLE subsystem. ITS 3.5.2 requires two ECCS trains to be OPERABLE, but the details of what constitutes an OPERABLE train are moved to the Bases. ITS SR 3.5.2.6 does not list the pumps which comprise an ECCS train. This changes the CTS by moving the details of what constitutes an OPERABLE system to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.5.2	LA.2	4.5.2.g	CTS Surveillance 4.5.2.g requires verification that a specified group of manual valves requiring adjustment to prevent pump “runout” and subsequent component damage are secured in the proper position for injection. ITS SR 3.5.2.7 requires verification that the same group of valves are secured in the correct position. This changes the CTS by moving the description of the purpose of the valves and what constitutes the proper position to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	2

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
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DOC No.		CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.5.2	LA.3	4.5.2.f	CTS Surveillance 4.5.2.f specifies that the HHSI pumps and LHSI pumps be tested in accordance with 4.0.5 (the Inservice Test Program) and that a specific developed head (i.e., developed head equals the discharge pressure minus the suction pressure) be met. ITS SR 3.5.2.4 requires the same testing, but the specific limits on developed head for each type of pump are maintained by the Inservice Test Program. This changes the CTS by moving the procedural details for meeting the Surveillance to the ISI/IST Program.	IST	ITS 5.5.7, Inservice Testing Program	3
3.5.2	LA.4	4.5.2.c	CTS Surveillance 4.5.2.c requires a visual inspection for loose debris in containment prior to establishing containment integrity and within affected areas of the containment at the completion of each containment entry when containment integrity is established. ITS does not include this requirement. This changes the CTS by moving this requirement to the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	3
3.5.2	LA.5	4.5.2.e.1 and 4.5.2.e.2	CTS Surveillance 4.5.2.e.1 and 4.5.2.e.2 require verification of the automatic actuation of the ECCS components every 18 months during shutdown. ITS SR 3.5.2.5 and SR 3.5.2.6 require this testing every 18 months. This changes CTS by moving the requirement that this testing be performed during shutdown to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.5.2	LA.6	4.5.2.e.1 and 4.5.2.e.2	CTS 4.5.2.e.1 and 4.5.2.e.2 require verification of the automatic actuation of ECCS components on a safety injection test signal. ITS SR SR 3.5.2.5 and SR 3.5.2.6 do not specify the signal, but only specify an actuation signal. This changes CTS by moving the designated actuation signal to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.5 – Emergency Core Cooling Systems (ECCS)

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.5.3 LA.1	3.5.3	CTS LCO 3.5.3 states that an ECCS subsystem shall be OPERABLE and contains a description of what constitutes an OPERABLE subsystem. ITS 3.5.3 requires an ECCS train be OPERABLE, but the details of what constitutes an OPERABLE train are moved to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.5.4 None	N/A	N/A	N/A	N/A	N/A
3.5.5 None	N/A	N/A	N/A	N/A	N/A
3.5.6 LA.1	3.5.4.1	CTS 3.5.4.1 states that when the boron injection tank is inoperable, the tank must be restored to OPERABLE status within one hour or the reactor must be in HOT STANDBY and borated to a Shutdown Margin (SDM) equivalent to 1.77% Δk/k at 200 °F within the next 6 hours. ITS 3.5.6, Actions A and B, contain similar requirements, but the specific value of SDM is relocated to the COLR.	COLR	ITS 5.6.5, Core Operating Limits Report	3
CTS 3.5.4.2 R.1	3.5.4.2	CTS 3.5.4.2 states, “At least two independent channels of heat tracing shall be OPERABLE for the boron injection tank and for the heat traced portions of the associated flow paths.” The ITS will not contain this requirement and it will be relocated to the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table A – Administrative Changes
ITS Section 3.6 - Containment Systems

DOC No.		Description of Change	ITS Requirement	CTS Requirement
3.6.1	A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.6.1	A.2	CTS 4.6.1.1.b states, "Primary CONTAINMENT INTEGRITY shall be demonstrated...By verifying that each containment air lock is OPERABLE per Specification 3.6.1.3." ITS does not include the reference to CTS 3.6.1.3, which is changed to ITS 3.6.2. This changes the CTS by not including a reference to another ; references to other LCO's are unnecessary.	None	4.6.1.1.b
3.6.1	A.3	CTS LCO 3.6.1.2, 3.6.1.2 Action, and Surveillance Requirement 4.6.1.6.1 reference specific 10 CFR 50, Appendix J, Option B requirements, and other specific leakage rate criteria. CTS 4.6.1.2 also states, "The provisions of Specification 4.0.2 are not applicable." ITS LCO 3.6.1 requires that containment be Operable, Action A.1 requires the containment be restored to Operable status, and Surveillance Requirement 3.6.1.1 requires performance of visual examinations and leakage rate testing except for containment air lock testing, in accordance with the Containment Leakage Rate Testing Program. ITS 5.5.16 states, "The provisions of SR 3.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program." This changes CTS by referencing the appropriate 10 CFR 50, Appendix J, Option B requirements, stating that SR 3.0.2 (vice CTS 4.0.2) is not applicable, and placing other specific leakage rate criteria in the Containment Leakage Rate Testing Program requirements in ITS 5.5.16, and the requirements remain the same.	LCO 3.6.1, Action A.1, SR 3.6.1.1, 5.5.1.6	LCO 3.6.1.2, 3.6.1.2 Action, Surveillance 4.6.1.6.1, 4.6.1.2
3.6.1	A.4	CTS 3.6.1.1 states, "Primary CONTAINMENT INTEGRITY shall be maintained." CTS 3.6.1.2 requires containment leakage rates be within specified parameters. CTS 3.6.1.6 requires that the structural integrity of the containment be maintained within specified parameters. CTS 1.6 states, "CONTAINMENT INTEGRITY shall exist when..." ITS 3.6.1 states, "Containment shall be OPERABLE. " This changes the CTS by combining the containment requirements of CTS 3.6.1.1, CTS 3.6.1.2, and CTS 3.6.1.6 into one LCO, the existing requirements remain the same.	3.6.1	3.6.1.1, 3.6.1.2, 3.6.1.6
3.6.1	A.5	CTS 3.6.1.2 Action does not state what action to take if specific leakage rate limits are not met while in the MODES of Applicability, and includes a requirement that the limits be met prior to entering the MODES of Applicability. Entry into CTS 3.0.3 is required if CTS 3.6.1.2 is not met while in the MODES of applicability. ITS 3.6.1 Required Action A.1 requires that if the Required Action and associated Completion Time are not met, the unit be shutdown. This changes CTS by stating the Required Shutdown Actions in the ITS LCO rather than deferring to CTS 3.0.3. The requirements are the same.	3.6.1, Required Action A.1	None

Table A – Administrative Changes
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.2 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.6.2 A.2	CTS 3.6.1.3 Action a.1 includes an Action requirement that states, "...and either restore the inoperable air lock to OPERABLE status..." ITS 3.6.2 Condition A does not include such an Action Requirement It is unnecessary to explicitly state that a system be restored to Operable status; it is always an option.	None	3.6.1.3, Action a.1
3.6.2 A.3	CTS 3.6.1.3.a.4 states, "The provisions of Specification 3.0.4 are not applicable." CTS 3.0.4 states, "Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provision contained in the ACTION statements unless otherwise excepted." ITS 3.6.2 does not contain the exception to ITS 3.0.4. ITS 3.0.4 states, "When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time." This changes CTS by deleting a reference to a requirement which is changed in ITS in such a way that the reference is no longer required. The requirements remain the same.	None	3.6.1.3.a.4
3.6.2 A.4	CTS 3.6.1.3 Action a.2 includes an Action requirement that states, "Operation may then continue until performance of the next required overall air lock leakage test provided that..." but does not include a requirement to perform such a test in response to entering the Condition. ITS 3.6.2 does not include such a statement. This changes CTS by deleting an exclusion for an Action that is not required.	None	3.6.1.3, Action a.2
3.6.2 A.5	CTS 3.6.1.3 states, "Each containment air lock shall be OPERABLE..." CTS 3.6.1.3 Action a states, "With one containment air lock door inoperable:" and specifies Actions to be taken. CTS 3.6.1.3 Action b states, "With a containment air lock inoperable, except as a result of an inoperable air lock door," and specifies Actions to be taken. ITS Actions NOTE 2 states, "Separate Condition entry is allowed for each air lock." ITS Condition A states, "One or more containment air locks with one containment air lock door inoperable," and ITS Condition C states, "One or more containment air locks inoperable for reasons other than Condition A or B." This changes CTS by clarifying the current intent of applying the Actions to each air lock separately; the current practice and interpretation of the CTS remain the same.	3.6.2 Action Note 2, Condition A and Condition B	3.6.1.3, Actions a and b

Table A – Administrative Changes
ITS Section 3.6 - Containment Systems

DOC No.		Description of Change	ITS Requirement	CTS Requirement
3.6.2	A.6	CTS 3.6.1.3 does not include a reference to entering applicable Conditions and Required Actions of the Containment OPERABILITY LCO (CTS 3.6.1.1). ITS 3.6.2 Actions NOTE 3 states, "Enter applicable Conditions and Required Actions of LCO 3.6.1, "Containment," when air lock leakage results in exceeding the overall containment leakage rate." This changes CTS by explicitly requiring the Containment Conditions be entered when the Containment LCO is not met as a result of air lock leakage exceeding limits. Current practice and interpretation of the CTS remain the same.	3.6.2, Actions Note 3	3.6.1.3
3.6.2	A.7	CTS 3.6.1.3 Action a addresses one inoperable containment air lock door, and CTS Action b addresses an inoperable containment air lock for reasons other than an inoperable air lock door, which includes both air lock doors in one air lock being inoperable. Either Action a or b would be taken. ITS 3.6.2 NOTE 1 of Required Action A directs entry into Condition C when both doors in the same air lock are inoperable. This changes CTS by adding a NOTE to clarify that entry into Condition C is required when both doors in the same air lock are inoperable, consistent with the CTS requirement. Current practice and interpretation of the CTS remain the same.	3.6.2, Required Action A, Note 1	3.6.1.3, Actions a and b
3.6.2	A.8	CTS LCO 3.6.1.3 and Surveillance Requirement 4.6.1.3 reference specific 10 CFR 50, Appendix J, Option B requirements, and other specific leakage rate criteria. ITS LCO 3.6.2 requires that containment air locks be Operable and Surveillance Requirement 3.6.2.1 requires performance of containment air lock leakage rate testing, in accordance with the Containment Leakage Rate Testing Program. This changes CTS by referencing the appropriate 10 CFR 50, Appendix J, Option B requirements, and other specific leakage rate criteria in the Containment Leakage Rate Testing Program requirements in ITS 5.5.15.	LCO 3.6.2, SR 3.6.2.1, 5.5.15	3.6.1.3, 4.6.1.3
3.6.2	A.9	CTS 4.6.1.3 references specific 10 CFR 50, Appendix J, Option B requirements, and other specific leakage rate criteria. ITS SR 3.6.2.1 requires performance of containment air lock leakage rate testing, in accordance with the Containment Leakage Rate Testing Program. ITS SR 3.6.2.1 Note 1 states, "An inoperable air lock door does not invalidate the previous successful performance of the overall air lock leakage test." This changes CTS by Adding Note 1 as a reminder that either air lock door is capable of providing a fission product barrier in the event of a DBA. ITS Changes associated with how the leakage rate criteria are addressed are addressed by DOC A.8. Current CTS requirements remain the same.	SR 3.6.2.1, Note 1	4.6.1.3

Table A – Administrative Changes
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.2 A.10	CTS 4.6.1.3 references specific 10 CFR 50, Appendix J, Option B requirements, and other specific leakage rate criteria. ITS SR 3.6.2.1 requires performance of containment air lock leakage rate testing, in accordance with the Containment Leakage Rate Testing Program. ITS SR 3.6.2.1 Note 2 states, "Results shall be evaluated against acceptance criteria applicable to SR 3.6.1.1." This changes CTS by adding Note 2 as a reminder that the air lock leakage must be accounted for in determining the combined Type B and C containment leakage rate. ITS Changes associated with how the leakage rate criteria are addressed are addressed by DOC A.8. Current CTS requirements remain the same.	SR 3.6.2.1, Note 1	4.6.1.3
3.6.3 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.6.3 A.2	CTS 3.6.3.1 and CTS 3.6.5.1 do not specifically require Conditions be entered for systems supported by containment isolation valves. OPERABILITY of supported systems is addressed through the definition of OPERABILITY for each system, and appropriate LCO Actions are taken. ITS 3.6.3 Action Note 3 states, "Enter applicable Conditions and Required Actions for systems made inoperable by containment isolation valves." ITS 3.0.6 provides an exception to LCO 3.0.2, stating, "When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered." LCO 3.0.6 goes on to describe how the Safety Function Determination Program is used to evaluate support-supported system relationships. This changes CTS by having a specific statement to require supported system Conditions and Required Actions be entered, whereas in CTS this would be done without the NOTE; the ITS is consistent with CTS interpretation and practice.	3.6.3, Action Note 3	None
3.6.3 A.3	CTS 3.6.3.1 and CTS 3.6.5.1 do not include a reference to entering applicable Conditions and Required Actions of the Containment OPERABILITY LCO (CTS 3.6.1.1). ITS 3.6.3 Action NOTE 4 states, "Enter applicable Conditions and Required Actions of LCO 3.6.1, "Containment," when leakage for a penetration flow path results in exceeding the overall containment leakage rate." This changes CTS by explicitly stating an existing requirement that the containment Actions be taken when the containment LCO is not met as a result of air lock leakage exceeding limits; the requirements remain the same.	3.6., Action Note 4	None

Table A – Administrative Changes
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.3 A.4	CTS 3.6.3.1.a requires restoring the inoperable valve(s) to OPERABLE status within 4 hours with one or more of the isolation valves inoperable, or take one of the other specified actions. ITS 3.6.3 does not state the requirement to restore an inoperable isolation valve to OPERABLE status, but includes other Actions to take within 4 hours. ITS LCO 3.0.2 states, "If the LCO is met or no longer applicable prior to the expiration of the specified Completion time(s), completion of the Required Actions(s) is not required unless otherwise stated." This changes CTS by including the requirement as part of LCO 3.0.2, rather than explicitly stating the allowance.	LCO 3.0.2	3.6.3.1
3.6.3 A.5	CTS 3.6.3.1 and CTS 3.6.5.1 do not include any Condition and Required Actions for one or more penetration flow paths with two containment isolation valves inoperable. CTS 3.0.3 would be entered for this Condition. ITS 3.6.3 Condition B states, "One or more penetration flow paths with two containment isolation valves inoperable." ITS Required Action B.1 states, "Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange," within 1 hour. ITS 3.6.3 Condition E requires the unit be placed in MODE 3 in 6 hours, and MODE 5 in 36 hours if the Required Action and associated Completion Time is not met. This changes CTS by stating the Actions to be taken for two containment isolation valves inoperable, rather than relying on CTS 3.0.3, which contains the same Completion Times for placing the unit outside its MODE of Applicability; the requirements remain the same.	3.6.3, Conditions B and E	None
3.6.3 A.6	CTS 3.6.3.1 Action states, "The provisions of Specification 3.0.4 do not apply." CTS 3.0.4 states, "Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provision contained in the ACTION statements unless otherwise excepted." ITS 3.6.2 does not contain the exception to ITS 3.0.4. ITS 3.0.4 states, "When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time." This changes CTS by incorporating an allowance into ITS LCO 3.0.4; the requirements remain the same.	ITS LCO 3.0.4	3.6.3.1 Action
3.6.3 A.7	CTS 4.6.3.1.3 requires the isolation time of each power operated or automatic containment isolation valve be determined to be within its limit when tested pursuant to Specification 4.0.5. ITS SR 3.6.3.3 requires verifying the isolation time of each automatic power operated containment isolation valve is within limits, with a Frequency in accordance with the Inservice Testing Program. This changes the CTS by stating that the Frequency is in accordance with the Inservice Testing Program. The requirements remain the same.	SR 3.6.3.3	4.6.3.1.3

Table A – Administrative Changes
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.3 A.8	CTS 3.6.3.1 Action states, "With one or more of the isolation valves inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open..." CTS 3.6.5.1 Action states, "With the inside or outside isolation valve in the steam jet air ejector suction line not closed, restore the valve to the closed position..." ITS 3.6.3 Actions NOTE 2 states, "Separate Condition entry is allowed for each penetration flow path." This changes CTS by stating an existing allowance in ITS format; the ITS is consistent with CTS interpretation and practice.	3.6.3 Actions Note 2	3.6.3.1 Action, 3.6.5.1 Action
3.6.3 A.9	CTS 4.6.5.1.1 states, "The steam jet air ejector suction line outside isolation valve shall be determined to be in the closed position by visual observation prior to increasing the Reactor Coolant System temperature above 200°F and..." ITS SR 3.6.3.1 does not include a reference to verification prior to increasing the Reactor Coolant System temperature above 200°F. ITS SR 3.0.1 states, "SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs..." This changes CTS by not including a statement for a requirement that is already addressed in the ITS 3.0 Section. The requirements remain the same.	None	4.6.5.1.1
3.6.3 A.10	CTS 4.6.3.1.1.a requires testing of each containment isolation valve that is a weight or spring loaded check valve testable during unit operation every 92 days. The ITS does not contain this Surveillance, and additionally, North Anna does not have any such isolation valve that are weight or spring loaded check valves which are testable during operation.	None	4.6.3.1.1.a
3.6.3 A.11	CTS 3.6.3.1 Action states, "With one or more of the isolation valves inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open..." ITS Conditions A and B Notes state, "Only applicable to penetration flow paths with two containment isolation valves." ITS Condition C Note states, "Only applicable to penetration flow paths with only one containment isolation valve and a closed system." ITS Condition ITS 3.6.3 Required Actions A.1 and C.1 require the associated flow path be isolated by one of the means specified with one or more penetration flow paths with one containment isolation valve inoperable. ITS 3.6.3 Required Actions A.1 and C.1 both assume the other isolation valve or closed system are OPERABLE for the isolation function. If two valves in a penetration flow path with two containment isolation valves are inoperable, Required Action B.1 requires the penetration be isolated within one hour, or Condition E is entered, requiring the unit be placed in MODE 3 within 6 hours, and MODE 5 within 36 hours. In a penetration flow path with one containment isolation valve and a closed system, where the containment isolation valve and the closed system were not capable of performing the isolation function, ITS LCO 3.0.3 would be entered. This changes CTS by incorporating the concept of assuring that the second means of containment isolation for a penetration flow path is OPERABLE into the Conditions and Required Actions associated with ITS 3.6.3. The ITS is consistent with CTS interpretation and practice.	3.6.3 Condition A, B, and C Notes, Required Action A.1, B.1, C.1, and Condition E	3.6.3.1 Action

Table A – Administrative Changes
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.3 A.12	CTS 4.6.1.1.d states, "Each time containment integrity is established after vacuum has been broken by pressure testing the butterfly isolation valves in the containment purge lines and the containment vacuum ejector line." The Applicability is MODES 1, 2, 3, and 4. The Frequency for ITS SR 3.6.3.4 states, "Prior to entering MODE 4 from MODE 5 after containment vacuum has been broken. This changes the CTS by adopting the ISTS Frequency format for such a Surveillance Requirement, clarifying that it is required to be performed prior to entering the MODE of Applicability each time the containment vacuum has been broken. The requirements are the same.	SR 3.6.3.4	4.6.1.1.d
3.6.3 A.13	CTS 4.6.1.1.d states, "Each time containment integrity is established after vacuum has been broken by pressure testing the butterfly isolation valves in the containment purge lines and the containment vacuum ejector line." ITS SR 3.6.3.4 states, "Perform leakage rate testing for containment purge valves with resilient seals." This changes CTS by clarifying that the valves being tested as part of the Surveillance Requirement are those with "resilient seals;" the ITS is consistent with CTS interpretation and practice. The changes moving some of the system description to the Bases is addressed by DOC LA.4.	SR 3.6.3.4	4.6.1.1.d
3.6.4 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.6.5 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.6.6 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.6.7 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.6.7 A.2	CTS 3.6.2.2 states two trains of containment recirculation spray shall be OPERABLE. ITS 3.6.7 states four Recirculation Spray (RS) subsystems shall be OPERABLE. This changes the CTS by specifying that the four subsystems that make up the two RS trains be OPERABLE. The requirements are the same.	LCO 3.6.7	3.6.2.2

Table A – Administrative Changes
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.7 A.3	CTS LCO 3.6.2.2.b states the casing cooling tank solution requirements that must be met for the casing cooling tank to be OPERABLE. ITS LCO 3.6.7 requires the casing cooling tank to be OPERABLE, but the specific solution requirements are moved to the Surveillance Requirements (SRs). This changes the CTS by moving specific parameter requirements that must be met for OPERABILITY from the LCO to the SRs. The requirements are the same.	LCO 3.6.7	LCO 3.6.2.2.b
3.6.7 A.4	CTS 3.6.2.2 does not contain an ACTION for one inside RS subsystem and one outside RS subsystem inoperable not in the same train, or for two outside RS subsystems inoperable, or for three or more RS subsystems inoperable. In these conditions CTS 3.0.3 would be entered. ITS 3.6.7 CONDITION G includes a REQUIRED ACTION to enter ITS 3.0.3 for these conditions.	3.6.7, Condition G	None
3.6.8 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS). The requirements are the same.	Various	Various
3.6.8 A.2	CTS LCO 3.6.2.3 contains a list of requirements that must be met for the Chemical Addition System to be OPERABLE. ITS LCO 3.6.8 still requires the Chemical Addition System to be OPERABLE, but the requirements for OPERABILITY are moved to Surveillances. The requirements are the same.	LCO 3.6.8	3.6.2.3
3.6.9 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various

Table L – Less Restrictive Changes
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.6.1 L.1	CTS 1.6 states, "CONTAINMENT INTEGRITY shall exist when:...1.6.2 All equipment hatches are closed and sealed." 3.6.3 states, "Each containment isolation valve shall be OPERABLE." This changes the CTS by not including an explicit reference to sealing the equipment hatches. The change associated with moving the reference to the equipment hatch to the Bases is addressed by DOC LA.1.	3.6.3	1.6	1
3.6.2 L.1	CTS 3.6.1.3 footnote "+" allows entry to the air lock to repair the inner air lock door, if inoperable. ITS 3.6.2 contains an Action NOTE that allows entry and exit to perform repairs on the affected air lock components. This changes CTS 3.6.1.3 by stating that exiting is allowed in addition to entry, and the entry can be for repairs on any affected air lock components, not just the inner air lock door.	3.6.2 Action Note	3.6.1.3, footnote +	4
3.6.2 L.2	CTS 3.6.1.3 Action b states, "With a containment air lock inoperable, except as the result of an inoperable air lock door, maintain at least one air lock door closed, restore the inoperable air lock to OPERABLE status within 24 hours, or be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours." This is the action that would be taken in the event of an inoperable air lock interlock mechanism. ITS 3.6.2 Condition B requires that with a containment air lock interlock mechanism inoperable, an OPERABLE door is verified closed in the affected air lock within 1 hour, an OPERABLE door is closed in the affected air lock, and an OPERABLE door is verified locked closed in the affected air lock once per 31 days. Required Action NOTES indicate that these Required Actions are not applicable if both doors in the same air lock are inoperable and Condition C is entered, and entry and exit of containment is permissible under the control of a dedicated individual. This changes the CTS by allowing indefinite operation with an inoperable air lock interlock mechanism, and allows entry and exit of containment under the control of a dedicated individual.	3.6.2, Action B Notes	3.6.1.3, Actoin b	4

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.6.2 L.3	CTS 3.6.1.3 does not provide an allowance for entry or exit through an air lock except for repair to the inner air lock door, if inoperable. ITS 3.6.2 Required Action A NOTE 2 states, "Entry and exit is permissible for 7 days under administrative controls if both air locks are inoperable." This changes CTS by allowing entry and exit of containment under specified criteria for any reason.	3.6.2, Action A, Note 2	3.6.1.3	4
3.6.2 L.4	CTS 3.6.1.3 does not address how to verify locked closed air lock doors in high radiation areas. ITS 3.6.2 Required Action A.3 contains a NOTE that provides an allowance for air lock doors in high radiation areas to be verified locked closed by administrative means when a containment air lock door or containment air lock interlock mechanism is inoperable. This changes CTS by allowing an air lock door in a high radiation area to be verified closed by administrative means.	3.6.2, Action A.3 Note	3.6.1.3	4
3.6.2 L.5	Not used.	N/A	N/A	N/A
3.6.2 L.6	CTS 4.6.1.3.b, which requires testing of the containment airlock interlock once per refueling outage. For North Anna, a refueling outage testing frequency is equivalent to 18 months. ITS SR 3.6.2.2 requires testing of the containment airlock interlock every 24 months. This changes the CTS by decreasing the Frequency for the containment airlock interlock test from every 18 months to every 24 months.	SR 3.6.2.2	4.6.1.3.b	7
3.6.3 L.1	CTS 4.6.3.1.1.b describes tests that must be performed prior to returning a valve to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit. The ITS does not include these testing requirements.	None	4.6.3.1.1.b	5

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.6.3 L.2	CTS 3.6.5.1 Action states, “With the inside or outside isolation valve in the steam jet air ejector suction line not closed, restore the valve to the closed position within 1 hour...” ITS 3.6.3 Action A.1 requires that with one or more penetration flow paths with one containment isolation valve inoperable, the affected isolation flow path be isolated by one of the specified methods within 4 hours. This changes CTS by increasing the time within which to take the Required Action from 1 hour to 4 hours.	3.6.3, Action A.1	3.6.5.1 Action	3
3.6.3 L.3	CTS 3.6.3.1 states, “With one or more of the (containment) isolation valves inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and: isolate each affected penetration within 4 hours” by one of the means specified. ITS 3.6.3 Condition C includes a Note stating that Condition C only applies to penetration flow paths with only one containment isolation valve and a closed system. Action C.1 requires that with one or more penetration flow paths with one containment isolation valve inoperable, the penetration flow path be isolated by one of the means specified within 72 hours. This changes the CTS by extending the Completion Time from 4 hours to 72 hours when the inoperable valve is used in conjunction with a closed system.	3.6.3, Condition C	3.6.3.1	3
3.6.3 L.4	CTS 3.6.5.1 Action states, “With the inside or outside isolation valve in the steam jet air ejector suction line not closed, restore the valve to the closed position...” ITS 3.6.3 Action A.1 requires that with one or more penetration flow paths with one containment isolation valve inoperable, the affected isolation flow path be isolated by use of at least one closed and de-activated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured. This changes CTS by only requiring the flow path be isolated by one of the specified methods, rather than requiring both valves be closed.	3.6.3, Action A.1	3.6.5.1, Action	4

- Change Category:
1 - Relaxation of LCO Requirements
2 - Relaxation of Applicability
3 - Relaxation of Completion Time
4 - Relaxation of Required Action
5 - Deletion of Surveillance Requirement
6 - Relaxation Of Surveillance Requirement Acceptance Criteria
7 - Relaxation Of Surveillance Frequency
8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.6.3 L.5	CTS 4.6.1.1.a, 4.6.5.1.1, and 4.6.5.1.2 require verification that specified containment penetrations are closed. ITS SR 3.6.3.1 and ITS SR 3.6.3.2 include similar requirements, but contain a Note that allows valves and blind flanges in high radiation areas to be verified administratively. This changes the CTS by allowing certain valves and blind flanges to not require physical verification.	SR 3.6.3.1 Note, SR 3.6.3.2 Note	4.6.1.1.a, 4.6.5.1.1, 4.6.5.1.2	6
3.6.3 L.6	CTS 4.6.1.1 states, "Primary CONTAINMENT INTEGRITY shall be demonstrated: a. At least once per 31 days by verifying that all penetrations* not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves, secured in their positions except for valves that are open under administrative control as permitted by Specification 3.6.3.1." The "*" footnote states, "Except valves, blind flanges, and deactivated automatic valves which are located inside the containment and are locked sealed or otherwise sealed in the closed position. These penetrations shall be verified closed during each COLD SHUTDOWN except that such surveillance need not be performed more often than once per 92 days." CTS 4.6.5.1.2 states, "The steam jet air ejector suction line inside isolation valve shall be determined to be in the closed position prior to increasing the Reactor Coolant System temperature above 200°F." ITS SR 3.6.3.1 states, "Verify each containment isolation manual valve and blind flange that is located outside containment and not locked, sealed, or otherwise secured and required to be closed during accident conditions is closed, except for containment isolation valves that are open under administrative controls," every 31 days. SR 3.6.3.2 has similar controls for valves inside containment, but a different Frequency. This changes the CTS by not requiring valves locked, sealed or otherwise secured be verified closed as part of the Technical Specification Surveillance Requirements.	SR 3.6.3.1, SR 3.6.3.2	4.6.1.1, footnote *, 4.6.5.1.2	6

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.6.3 L.7	CTS 4.6.1.1 states, “Primary CONTAINMENT INTEGRITY shall be demonstrated: a. At least once per 31 days by verifying that all penetrations* not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves, secured in their positions except for valves that are open under administrative control as permitted by Specification 3.6.3.1.” The "*" footnote states, “Except valves, blind flanges, and deactivate automatic valves which are located inside the containment and are locked sealed or otherwise sealed in the closed position. These penetrations shall be verified closed during each COLD SHUTDOWN except that such surveillance need not be performed more often than once per 92 days.” ITS SR 3.6.3.2 states, “Verify each containment isolation manual valve and blind flange that is located inside containment and not locked, sealed, or otherwise secured and required to be closed during accident conditions is closed, except for containment isolation valves that are open under administrative controls.” The Frequency is prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days. This changes the CTS for the valves inside containment by only requiring valves not locked, sealed or otherwise secured to be verified closed prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days, instead of every 31 days. Changes associated with not requiring verification of closure of valves which are locked, sealed, or otherwise secured, are addressed in DOC L.6.	SR 3.6.3.2	4.6.1.1 footnote *	7

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.6.3 L.8	CTS 4.6.5.1.2 states, “The steam jet air ejector suction line inside isolation valve shall be determined to be in the closed position prior to increasing the Reactor Coolant System temperature above 200°F.” ITS SR 3.6.3.2 states, “Verify each containment isolation manual valve and blind flange that is located inside containment and not locked, sealed, or otherwise secured and required to be closed during accident conditions is closed, except for containment isolation valves that are open under administrative controls.” The Frequency is prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days. This changes the CTS by adding the criteria to the Frequency that the verification may be performed up to 92 days prior to entering MODE 4 from MODE 5. Changes associated with valves which are locked, sealed, or otherwise secured are addressed by DOC L.6.	SR 3.6.3.2	4.6.5.1.2	7
3.6.3 L.9	CTS 3.6.3.1 footnote “*” states, “Locked or sealed closed valves may be opened on an intermittent basis under administrative control.” ITS 3.6.3 Action Note 1 states, “ Penetration flow paths, except for 36 inch purge and exhaust valve, 18 inch containment vacuum breaking valve, 8 inch purge bypass valve, and steam jet air ejector suction flow paths, may be unisolated on an intermittent basis under administrative control.” This changes the CTS by allowing any penetration, except for the exceptions noted, to be unisolated on an intermittent basis under administrative control, and not just locked or sealed closed valves. Changes associated with the exceptions to this allowance listed are addressed by DOC M.2.	3.6.3, Action Note 1	3.6.3.1	1

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.6.3 L.10	CTS 3.6.3.1 Action states, “With one or more of the isolation valves inoperable...b. Isolate each affected penetration within 4 hours by use of at least one deactivated automatic valve secured in the isolation position, or c. Isolate each affected penetration within 4 hours by use of at least one closed manual valve or blind flange...” ITS 3.6.3 Action A.1 requires that with one or more penetration flow paths with one containment isolation valve inoperable, the affected isolation flow path be isolated by use of at least one closed and de-activated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured. This changes CTS by allowing penetration flow paths with two containment isolation valves that have one containment isolation valve inoperable, to use a check valve with flow through the valve secured as the means of isolating the penetration flow path.	3.6.3, Action A.1	3.6.3.1 Actoin	4
3.6.3 L.11	CTS 4.6.3.1.2 states, “Each containment isolation valve shall be demonstrated OPERABLE...by: a. Verifying that on a Phase A containment isolation test signal, each Phase A isolation valve actuates to its isolation position. b. Verifying that on a Phase B containment isolation test signal, each Phase B isolation valve actuates to its isolation position.” ITS SR 3.6.3.4 states, “Verify each automatic power operated containment isolation valve that is not locked, sealed or otherwise secured in position, actuates to the isolation position on an actual or simulated actuation signal.” This changes the CTS by not requiring valves locked, sealed or otherwise secured in position be tested to automatically actuate to their isolation position. Changes associated with moving details to the Bases are addressed by DOC LA.3. Changes associated with allowing the use of an actual signal for conducting the Surveillance Requirement are addressed by DOC L.12.	SR 3.6.3.4	4.6.3.1.2	6

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.6.3 L.12	CTS 4.6.3.1.2 states, "Each containment isolation valve shall be demonstrated OPERABLE...by: a. Verifying that on a Phase A containment isolation test signal, each Phase A isolation valve actuates to its isolation position. b. Verifying that on a Phase B containment isolation test signal, each Phase B isolation valve actuates to its isolation position." ITS SR 3.6.3.4 states, "Verify each automatic power operated containment isolation valve that is not locked, sealed or otherwise secured in position, actuates to the isolation position on an actual or simulated actuation signal." This changes the CTS by not requiring valves locked, sealed or otherwise secured in position be tested to automatically actuate to their isolation position. Changes associated with moving details to the Bases are addressed by DOC LA.3. Changes associated with not requiring the Surveillance Requirement be conducted on valves locked, sealed, or otherwise secured in position are addressed by DOC L.11.	SR 3.6.3.4	4.6.3.1.2	6
3.6.3 L.13	CTS 4.6.3.1.3 states, "The isolation time of each power operated or automatic containment isolation valve shall be determined to be within its limit when tested..." ITS SR 3.6.3.3 states, "Verify the isolation time of each automatic power operated containment isolation valve is within limits." This changes the CTS by deleting the reference to power operated containment isolation valves that may not be automatic.	SR 3.6.3.3	4.6.3.1.3	6
3.6.3 L.14	Not used.	N/A	N/A	N/A

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.6.3 L.15	CTS 3.6.3.1 states that with one or more isolation valves inoperable, maintain at least one isolation valve OPERABLE in each affected penetration and restore the inoperable valve to OPERABLE status within 4 hours. ITS 3.6.3, ACTION D, states that with purge valve leakage not within limit, restore leakage within limit within 24 hours. This changes the CTS by relaxing the Completion Time for one or more inoperable purge valves from 4 hours to 24 hours.	3.6.3 Action D	3.6.3.1	3
3.6.4 None	N/A	N/A	N/A	N/A
3.6.5 None	N/A	N/A	N/A	N/A
3.6.6 L.1	CTS Surveillance 4.6.2.1.c.1 requires verification that each automatic valve in the flow path actuates to its correct position on a containment - high-high pressure signal. ITS SR 3.6.6.3 requires verification that each automatic valve in the flow path that is not locked, sealed, or otherwise secured in position actuates to its correct position on an actual or simulated actuation signal. This changes the CTS by excluding those valves that are locked, sealed, or otherwise secured in position from this test. Removal of the containment - high-high pressure signal reference and addition of the actual or simulated actuation signal reference are addressed by Removed Detail and Less Restrictive changes respectively.	SR 3.6.6.3	4.6.2.1.c.1	6
3.6.6 L.2	CTS Surveillances 4.6.2.1.c.1 and 4.6.2.1.c.2 require verification of the automatic actuation of QS components on a containment high-high pressure signal. ITS SR 3.6.6.3 and SR 3.6.6.4 specify that the testing may be performed with an actual or simulated actuation signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test. The change from “containment high-high signal” to “actuation signal” is discussed in LA.3.	SR 3.6.6.3, SR 3.6.6.4	4.6.2.1.c.1, 4.6.2.1.c.2	6

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.6.7 L.1	CTS 3.6.2.2 ACTION b states that with two containment RS subsystems inoperable in one RS train, restore one inoperable subsystem to OPERABLE status within 72 hours. ITS 3.6.7 Condition C addresses two inside RS subsystems inoperable, allowing a COMPLETION TIME of 72 hours. This changes the CTS by allowing 72 to hours to restore one RS subsystem to OPERABLE status when two inside RS subsystems are inoperable instead of entering LCO 3.0.3.	3.6.7, Condition C	3.6.2.2 Action b	4
3.6.7 L.2	CTS 3.6.2.2, ACTION b states that with two RS subsystems inoperable in one RS train, one inoperable subsystem must be restored to OPERABLE status within 72 hours, or the unit be placed in HOT STANDBY within the next 6 hours, and COLD SHUTDOWN within the next 30 hours. CTS 3.6.2.2, ACTION c states that with the casing cooling tank inoperable, the tank must be restored to OPERABLE status within 72 hours, or the unit be placed in HOT STANDBY within the next 6 hours, and COLD SHUTDOWN within the next 30 hours. ITS 3.6.7 REQUIRED ACTION E.2 states that 84 hours is allowed to place the unit in MODE 5. This changes CTS by allowing 48 more hours to place the unit in MODE 5 when the Required Actions and associated Completion Times are not met.	3.6.7, Action E.2	3.6.2.2, Action b, Action c	3
3.6.7 L.3	CTS 4.6.2.2.1.c.1 and 4.6.2.2.1.c.2 require verification of the automatic actuation of RS components on a containment high-high pressure signal. ITS SR 3.6.7.6 states that automatic actuation of RS components may be performed with an actual or simulated actuation signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test. The change from “containment high-high signal” to “actuation signal” is discussed in LA.4.	SR 3.6.7.6	4.6.2.2.1.c.1, 4.6.2.2.1.c.2	6

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.6.7 L.4	CTS 4.6.2.2.1.c.2 requires verification that each automatic valve in the RS flow path actuates to its correct position on an actuation signal. ITS SR 3.6.7.6.a requires verification that each RS automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to its correct position on an actuation signal. This changes the CTS by specifying that the verification applies only to automatic RS valves that are not locked, sealed, or otherwise secured in position.	SR 3.6.7.6	4.6.2.2.1.c.2	6
3.6.8 L.1	CTS Surveillance 4.6.2.3.c requires verification of the automatic actuation of Chemical Addition System automatic valves on a containment high-high test signal. ITS SR 3.6.8.4 specifies that the testing may be performed with an actual or simulated (i.e., test) actuation signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test. The change from “containment high-high signal” to “actuation signal” is discussed in LA.3.	SR 3.6.8.4	4.6.2.3.c	6
3.6.8 L.2	CTS Surveillance 4.6.2.3.c requires verification that each automatic valve in the flow path actuates to its correct position on a containment high-high test signal. ITS SR 3.6.8.4 requires verification that each automatic valve in the flow path that is not locked, sealed, or otherwise secured in position actuates to its correct position on an actual or simulated actuation signal. This changes the CTS by excluding those valves that are locked, sealed, or otherwise secured in position from this test. Removal of the containment - high-high pressure signal reference and addition of the actual or simulated actuation signal reference are addressed by Removed Detail and Less Restrictive changes respectively.	SR 3.6.8.4	4.6.2.3.c	6

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.6 - Containment Systems

DOC No.		Description of Change	ITS Requirement	CTS Requirement	Change Type
3.6.9	L.1	CTS 4.6.4.2.E requires performing a CHANNEL CALIBRATION of all instrumentation and control circuits on each hydrogen recombiner once per 18 months. ITS does not include this requirement. This changes the CTS by deleting a Surveillance Requirement.	None	4.6.4.2.E	5
3.6.9	L.2	CTS 3.6.4.2 states, "With one hydrogen recombiner system inoperable, restore the inoperable system to OPERABLE status within 30 days or be in at least HOT STANDBY within the next 6 hours." ITS 3.6.9 Condition A requires one inoperable hydrogen recombiner be restored to OPERABLE status within 30 days. ITS 3.6.9 Condition B requires that with two hydrogen recombiners inoperable, "Verify by administrative means that the hydrogen control function is maintained," within one hour and once per 12 hours thereafter, and, "Restore one hydrogen recombiner to OPERABLE status," within 7 days. This changes the CTS by allowing both hydrogen recombiners to be inoperable for 7 days if the Required Actions are met, instead of entering CTS LCO 3.0.3.	3.6.9, Conditions A and B	3.6.4.2	3

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table M – More Restrictive Changes
ITS Section 3.6 - Containment Systems

DOC No.		Description of Change	ITS Requirement	CTS Requirement
3.6.1	M.1	CTS 3.6.1.6 Action states that if containment structural integrity does not meet specified requirements, the structural integrity must be restored to within limits within 24 hours. ITS 3.6.1 A.1 states that the containment shall be restored to OPERABLE status within 1 hour. This changes CTS by requiring the structural integrity aspect of containment OPERABILITY be restored to OPERABLE status within 1 hour instead of 24 hours.	3.6.1, Action A.1	3.6.1.6 Action
3.6.2	M.1	CTS 3.6.1.3.a.1 and CTS 3.6.1.3.b do not include a Completion Time for the action to maintain at least one containment air lock closed when a containment air lock door or a containment air lock is inoperable. ITS 3.6.2 Required Actions A.1, B.1, and C.2 require verifying the OPERABLE Containment air lock door closed in the affected air lock within 1 hour when the Conditions are entered. This changes CTS by specifying a Completion Time of 1 hour for verifying an OPERABLE air lock door is closed in an inoperable air lock.	3.6.2, Actions A.1, B.1, and C.2	3.6.1.3.a.1, 3.6.1.3.b
3.6.2	M.2	CTS 3.6.1.3 does not contain an Action to, “initiate action to evaluate overall containment leakage rate.” ITS 3.6.2 Required Action C.1 requires initiation of action to evaluate overall containment leakage rate per ITS 3.6.1 immediately when one or more containment air locks are inoperable for reasons other than Condition A or B. This changes CTS by adding a new Required Action.	3.6.2 Action C.1	None
3.6.3	M.1	CTS 3.6.3.1 and CTS 3.6.5.1 do not contain a requirement to periodically verify an affected penetration flow path is isolated after it is isolated due to one inoperable containment isolation valve. ITS 3.6.3 Required Action A.2 requires the affected penetration flow path be verified isolated once per 31 days for isolation devices outside containment and prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days for isolation devices inside containment. ITS 3.6.3, Required Action C.2, requires the affected penetration flow path to be verified isolated every 31 days. ITS 3.6.3 Required Actions A.2 and C.2 include two NOTES. These NOTES allow isolation devices in high radiation areas and isolation devices that are locked, sealed, or otherwise secured to be verified by administrative means. This changes CTS by a adding new Required Actions to the Actions.	3.6.3, Actions A.2 and C.2	None
3.6.3	M.2	CTS 3.6.3.1 footnote “*” states, “Locked or sealed closed valves may be opened on an intermittent basis under administrative control.” ITS 3.6.3 Action Note 1 states, “ Penetration flow paths, except for 36 inch purge and exhaust valve, 18 inch containment vacuum breaking valve, 8 inch purge bypass valve, and steam jet air ejector suction flow paths, may be unisolated on an intermittent basis under administrative control.” This changes CTS by not allowing the valves in the specified flow paths to be included as containment isolation valves allowed to be opened intermittently under administrative control. Changes associated with changing the reference from “Locked or sealed closed valves” to “Penetration flow paths” are addressed by DOC L.9.	3.6.3, Action Note 1	3.6.3.1, footnote *

Table M – More Restrictive Changes
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.3 M.3	CTS 3.6.5.1 Action states, “With the inside or outside isolation valve in the steam jet air ejector suction line not closed, restore the valve to the closed position within 1 hour or be in HOT SHUTDOWN within the next 12 hours.” ITS 3.6.3 requires that with the Required Action and associated Completion Time for containment isolation valves not met, the unit be in MODE 3 in 6 hours, and MODE 5 in 36 hours. This changes CTS by requiring the unit be in MODE 3 in 6 hours, and MODE 5 in 36 hours, instead of only HOT SHUTDOWN (MODE 4) in 12 hours.	3.6.3, Action D	3.6.5.1 Action
3.6.4 None	N/A	N/A	N/A
3.6.5 None	N/A	N/A	N/A
3.6.6 None	N/A	N/A	N/A
3.6.7 M.1	CTS 3.6.2.2 Action a requires that if one containment recirculation spray subsystem is inoperable in one containment recirculation spray train, that the inoperable subsystem be restored to OPERABLE status within 7 days. If this is not accomplished, the unit is to be placed in at least HOT STANDBY within the next 6 hours. The inoperable subsystem is then to be restored to OPERABLE status within the next 48 hours, or be in COLD SHUTDOWN within the next 30 hours. ITS Required Action E.2 requires that if the Required Action and associated Completion Time is not met, that the unit be placed in MODE 5 within 84 hours. This changes CTS by declaring the time for commencement of shutdown to MODE 5 earlier in the sequence of Required Actions.	3.6.7, Action E.2	3.6.2.2 Action A
3.6.8 M.1	CTS 3.6.2.3 Action requires that if the chemical addition system is inoperable, that the inoperable system be restored to OPERABLE status within 72 hours. If this is not accomplished, the unit is to be placed in at least HOT STANDBY within the next 6 hours. The inoperable system is then to be restored to OPERABLE status within the next 48 hours, or be in COLD SHUTDOWN within the following 30 hours. ITS Required Action B.2 requires that if the Required Action and associated Completion Time is not met, that the unit be placed in MODE 5 within 84 hours. This changes CTS by declaring the time for commencement of shutdown to MODE 5 earlier in the sequence of Required Actions.	3.6.8, Action B.2	3.6.2.3 Action
3.6.9 M.1	CTS 3.6.4.2, Action b states, "The provisions of Specification 3.0.4 are not applicable." ITS LCO 3.6.9 does not contain a similar allowance. This changes the CTS by eliminating an explicit Specification 3.0.4 exception.	None	3.6.4.2, Action b

Table R – Relocated Specifications and Removed Details
ITS Section 3.6 – Containment Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.6.1 LA.1	1.6.2	CTS 1.6 states, "CONTAINMENT INTEGRITY shall exist when:...1.6.2 All equipment hatches are closed and sealed." 3.6.1 states, "Containment shall be OPERABLE." This changes the CTS by moving the reference to the equipment hatch being closed to the Bases. The change deleting the phrase "and sealed" is addressed by DOC L.1.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	2
3.6.1 LA.2	1.6.1	CTS 1.6 states, "CONTAINMENT INTEGRITY shall exist when:...1.6.1 All penetrations required to be closed during accident conditions are either: a. Capable of being closed by an OPERABLE containment automatic isolation valve system, or b. Closed by manual valves, blind flanges, or deactivated automatic valves secured in their closed positions, except for valves that are open under administrative control as permitted by Specification 3.6.3.1." This changes the CTS by moving the 1.6.1 portions of the definition to the 3.6.1 Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	2
3.6.2 LA.1	3.6.1.3.a and b	CTS LCO 3.6.1.3 parts a and b state what constitutes an OPERABLE containment air lock. ITS LCO 3.6.2 does not include this level of detail. Part a of this detail is moved to the Bases of the ITS. This changes the CTS by moving details concerning what constitutes an OPERABLE containment air lock to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	1

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.6 – Containment Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.6.3 LA.1	4.6.3.1.2	CTS 4.6.3.1.2 states, “Each containment isolation valve shall be demonstrated OPERABLE during COLD SHUTDOWN or REFUELING MODE at least once per 18 months...” by means that include actuation of specified automatic valves and cycling of weight or spring loaded check valves not testable during unit operation. ITS Frequency of SR 3.6.3.5 and SR 3.6.3.6 is 18 months, and does not include the phrase, “...during COLD SHUTDOWN and REFUELING MODE...” This changes the CTS by moving the reference to the 18 month Frequency being based on the need to perform this Surveillance under the conditions that apply during a unit outage to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3
3.6.3 LA.2	4.6.5.1.1	CTS 4.6.5.1.1 states, “The steam jet air ejector suction line outside isolation valve shall be determined to be in the closed position by visual observation...” ITS SR 3.6.3.1 does not include the reference to visual inspection. This changes the CTS by moving the detail of how the verification is performed to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3

- Change Category:
- 1 - Removing Details of System Design and System Description, Including Design Limits
 - 2 - Removing Descriptions of System Operation
 - 3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
 - 4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
 - 5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.6 – Containment Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.6.3 LA.3	4.6.3.1.2	CTS 4.6.3.1.2 states, “Each containment isolation valve shall be demonstrated OPERABLE...by: a. Verifying that on a Phase A containment isolation test signal, each Phase A isolation valve actuates to its isolation position. b. Verifying that on a Phase B containment isolation test signal, each Phase B isolation valve actuates to its isolation position.” ITS SR 3.6.3.4 states, “Verify each automatic power operated containment isolation valve that is not locked, sealed or otherwise secured in position, actuates to the isolation position on an actual or simulated actuation signal.” This changes the CTS by moving the detail concerning which signals are used to conduct the Surveillance Requirement to the Bases. Changes associated with not requiring the Surveillance Requirement be conducted on valves locked, sealed, or otherwise secured in position are addressed by DOC L.11. Changes associated with allowing the use of an actual signal for conducting the Surveillance Requirement are addressed by DOC L.12.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	1
3.6.3 LA.4	4.6.1.1.d	CTS 4.6.1.1.d states, “Each time containment integrity is established after vacuum has been broken by pressure testing the butterfly isolation valves in the containment purge lines and the containment vacuum ejector line.” ITS SR 3.6.3.4 states, “Perform leakage rate testing for containment purge valves with resilient seals.” This changes the CTS by moving the details specifically naming butterfly valves and the containment vacuum air ejector line to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	4
3.6.4 None	N/A	N/A	N/A	N/A	N/A

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
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5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.6 – Containment Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.6.5 LA.1	4.6.1.5.1	CTS 4.6.1.5.1 includes specific locations where containment temperatures are to be measured. ITS SR 3.6.5.1 does not include these details. This changes the CTS by moving the description of how compliance with the Technical Specification LCO is determined to the UFSAR.	UFSAR	10 CFR 50.59	3
3.6.5 LA.2	4.6.5.1	CTS 4.6.5.1 states, “The primary containment average air temperature shall be the weighted average of at least the minimum number of temperatures...” ITS SR 3.6.5.1 states, “Verify containment average air temperature is within limits.” This changes the CTS by moving the requirement to take a weighted average of temperatures to perform the Surveillance Requirement to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3
3.6.6 LA.1	LCO 3.6.2.1	CTS LCO 3.6.2.1 states that two independent containment quench spray subsystems shall be OPERABLE. ITS 3.6.6 also requires two quench spray trains (i.e., subsystems) to be OPERABLE. This changes the CTS by moving the detail that the trains must be independent to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	1
3.6.6 LA.2	4.6.2.1.b	CTS SR 4.6.2.1.b states, “Verifying that on recirculation flow, each pump develops a discharge pressure of ≥ 123 psig when tested pursuant to Specification 4.0.5.” ITS SR 3.6.6.2 states, “Verify each QS pump’s developed head at the flow test point is greater than or equal to the required developed head.” This changes the CTS by moving the required developed head limit from the Technical Specifications to the Inservice Test Program. The change to the description of the test being performed using recirculation flow is discussed in LA.5.	Inservice Test Program	ITS 5.5.7, Inservice Testing Program	3

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
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Table R – Relocated Specifications and Removed Details
ITS Section 3.6 – Containment Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.6.6 LA.3	4.6.2.1.c.1, 4.6.2.1.c.2	CTS Surveillances 4.6.2.1.c.1 and 4.6.2.1.c.2 require verification of the automatic actuation of QS components on a containment high-high pressure signal. ITS SR 3.6.6.3 and SR 3.6.6.4 do not specify the name of the signal, but only specify an actuation signal. This changes the CTS by moving the type of actuation signal to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3
3.6.6 LA.4	4.6.2.1.d	CTS Surveillance 4.6.2.1.d states, “At least once per 10 years by performing an air or smoke flow test through each spray header and verifying each spray nozzle is unobstructed.” ITS SR 3.6.6.5 states, “Verify each spray nozzle is unobstructed.” This changes the CTS by moving the details of the test to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3
3.6.6 LA.5	4.6.2.1.b	CTS SR 4.6.2.1.b states, “Verifying that on recirculation flow, each pump develops a discharge pressure of ≥ 123 psig when tested pursuant to Specification 4.0.5.” ITS SR 3.6.6.2 states, “Verify each QS pump’s developed head at the flow test point is greater than or equal to the required developed head.” This changes the CTS by moving the description that the test is performed using recirculation flow to the Bases of the Surveillance. The change moving the required developed head limit from the Technical Specifications is discussed in LA.2.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3
3.6.7 LA.1	3.6.2.2	CTS 3.6.2.2 states that two trains of containment RS shall be OPERABLE and contains a description of subsystems that each train consists of. ITS 3.6.7 states that four RS subsystems shall be OPERABLE, but the details of what constitutes an OPERABLE subsystem are moved to the Bases. This changes the CTS by moving the details of what constitutes a subsystem to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	1

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.6 – Containment Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.6.7 LA.2	3.6.2.2.b	CTS LCO 3.6.2.2.b states that one casing cooling tank shared with both trains of RS shall be OPERABLE. ITS 3.6.7 states a casing cooling tank shall be OPERABLE, but the details regarding both trains sharing the tank are moved to the Bases. This changes the CTS by moving the detail that that a casing cooling tank is shared by both trains of RS to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	1
3.6.7 LA.3	4.6.2.2.1.c.1	CTS 4.6.2.2.1.c.1 requires each containment RS subsystem and casing cooling subsystem be demonstrated OPERABLE by verifying that the casing cooling pump, and inside and outside RS pumps start automatically after a specified time delay. ITS SR 3.6.7.6 requires verification that the RS System pumps start automatically on an actuation signal, and does not contain the specific delay times. This changes CTS 4.6.2.2.1.c.1 by moving the specific delay times to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3
3.6.7 LA.4	4.6.2.2.1.c.1, 4.6.2.2.1.c.2	CTS 4.6.2.2.1.c.1 and 4.6.2.2.1.c.2 require verification of the automatic actuation of RS components on a containment high-high pressure signal. ITS SR 3.6.7 does not specify the signal, but only specifies an actuation signal. This changes CTS by moving the designated actuation signal to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3
3.6.7 LA.5	4.6.2.2.1.	CTS 4.6.2.2.1.d requires each containment RS subsystem and casing cooling subsystem be demonstrated OPERABLE, “At least once per 10 years by performing an air or smoke flow test through each spray header and verifying each spray nozzle is unobstructed.” ITS SR 3.6.7.7 states, “Verify each spray nozzle is unobstructed.” This changes the CTS by moving the details regarding the test method to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.6 – Containment Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.6.8 LA.1	4.6.2.3.b.2	CTS Surveillance 4.6.2.3.b.2 requires verification of the concentration of NaOH solution in the chemical addition tank by chemical analysis. ITS SR 3.6.8.3 also requires verification of the NaOH solution concentration but does not specify how that verification is performed. This changes the CTS by moving the method of verification to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3
3.6.8 LA.2	4.6.2.3.c	CTS Surveillance 4.6.2.3.c requires verification of the automatic actuation of the Chemical Addition System automatic valves every 18 months during shutdown. ITS SR 3.6.8.4 requires this testing every 18 months. This changes the CTS by moving the requirement that this testing be performed during shutdown to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3
3.6.8 LA.3	4.6.2.3.c	CTS Surveillance 4.6.2.3.c requires verification of the automatic actuation of the Chemical Addition System automatic valves on a containment high-high pressure test signal. ITS SR 3.6.8.4 will not specify the name of the signal, but will only specify an actuation signal. This changes the CTS by moving the type of actuation signal to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3
3.6.8 LA.4	4.6.2.3.d	CTS Surveillance 4.6.2.3.d requires verification of flow from the RWST and the chemical addition tank every 5 years using the drain lines in the cross connection between the tanks. ITS SR 3.6.8.5 also requires verification of the flow from each solution's flow path every 5 years. This changes CTS by moving the specific requirement to verify the flow through the drain lines in the cross connection between the respective tanks to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
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Table R – Relocated Specifications and Removed Details
ITS Section 3.6 – Containment Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.6.9 LA.1	3.6.4.2	CTS 3.6.4.2 states, “Two separate and independent containment hydrogen recombiner systems,” shared with Unit 2 or Unit 1 for the Unit 1 or Unit CTS, respectively, “shall be OPERABLE.” ITS 3.6.9 states, “Two hydrogen recombiners shall be OPERABLE.” This changes the CTS by moving the detail, “separate and independent,” and the reference to the sharing of the systems between units to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	1
3.6.9 LA.2	4.6.4.2.a, 4.6.4.2.b, 4.6.4.2.c, 4.6.4.2.d	CTS 4.6.4.2.a, CTS 4.6.4.2.b, CTS 4.6.4.2.c, and CTS 4.6.4.2.d include detail for performance of a functional test, resistance to ground test, and visual examination. ITS SR 3.6.9.1, ITS SR 3.6.9.2, and ITS SR 3.6.9.3 together require that each of these three tests be performed. This changes CTS by moving the detail of how these tests are performed to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table A – Administrative Changes
ITS Section 3.7 – Plant Systems

DOC No.		Description of Change	ITS Requirement	CTS Requirement
3.7.1	A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.7.1	A.2	CTS Table 3.7-1 states the maximum allowable Power Range Neutron Flux - High setpoint as a function of the number of inoperable main steam safety valves. ITS Table 3.7.1-1 states the maximum allowable Power Range Neutron Flux - High setpoint as a function of the number of OPERABLE main steam safety valves. This changes the CTS by stating the maximum allowable Power Range Neutron Flux - High setpoint as a function of the number of OPERABLE, vice inoperable, main steam safety valves.	Table 3.7.1-1	Table 3.7-1
3.7.1	A.3	CTS 3.7.1.1 states, "All main steam line code safety valves associated with each steam generators of an unisolated reactor coolant loop shall be OPERABLE with lift settings as specified in Table 3.7-2." ITS 3.7.1 states, "Five MSSVs per steam generator shall be OPERABLE." This changes the CTS by stating the number of MSSVs required to be OPERABLE per steam generator, eliminating a reference to unisolated loops, and eliminating a reference to Table 3.7-2.	None LCO 3.7.1	3.7.1.1
3.7.2	A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.7.2	A.2	CTS Surveillance 4.7.1.5 states that the MSTV shall be demonstrated OPERABLE by full closure within 5 seconds when tested pursuant to Specification 4.0.5. Specification 4.0.5 refers to the Inservice Test Program requirements. ITS SR 3.7.2.1 states each MSTV is verified OPERABLE with a closure time of ≤ 5 seconds in accordance with the Inservice Testing Program. This changes the CTS by replacing a reference to CTS 4.0.5 to a reference to the Inservice Testing Program.	3.7.2.1	4.7.1.5
3.7.3	None	N/A	N/A	N/A
3.7.4	None	N/A	N/A	N/A
3.7.5	A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various

Table A – Administrative Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.5 A.2	CTS 4.7.1.2.a.1 requires verification that each AFW valve in the flow path not locked, sealed, or otherwise secured in position is in its correct position. ITS SR 3.7.5.1 requires verification that each AFW valve in each water flow path, and in both steam supply flow paths to the steam turbine driven pump not locked, sealed, or otherwise secured in position is in its correct position. This changes CTS 4.7.1.2.a.1 by expanding the description of the applicable flow path to specifically include the steam supply valves (MS-TV-111A and MS-TV-111B for Unit 1 and MS-TV-211A and MS-TV-211B for Unit 2) to the turbine driven AFW pump. These valves are currently considered required to be verified by CTS 4.7.1.2.a.	SR 3.7.5.1	4.7.1.2.a.1
3.7.5 A.3	CTS LCO 3.7.1.2 states the requirements for the AFW system in terms of "pumps and associated flow paths." CTS 3.7.1.2 Actions a, b, and c refer to the requirements in terms of "pump" or "pumps" when addressing the AFW system. ITS LCO 3.7.5 and the associated ACTIONS state the requirements in terms of "trains required to be OPERABLE". A train consists of a pump and the associated flow path from the Emergency Condensate Storage Tank (ECST) to the associated steam generator (SG). This changes the CTS by adding the term "train" to the CTS to clarify the requirements for the AFW system.	3.7.5	3.7.1.2
3.7.6 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.7.6 A.2	CTS 3.7.1.3 ACTIONS require if the condensate storage tank (CST) becomes inoperable, within four hours restore the Emergency Condensate Storage Tank (ECST) is restored to OPERABLE status or be in HOT SHUTDOWN within the next twelve hours. The OPERABILITY of the CST to act as a backup water supply to the AFW pumps must be demonstrated if the ECST is not returned to OPERABLE status within four hours. The ECST must be restored to OPERABLE status within seven days or the plant must be placed in HOT SHUTDOWN within the next twelve hours. In addition to these requirements, CTS surveillance 4.7.1.3.2 states the CST shall be demonstrated OPERABLE at least once per twelve hours. This requirement is accomplished by verifying the water level in the CST is sufficient to replenish the ECST to 110,000 gallons whenever the CST is the supply source for the AFW pumps. ITS 3.7.6 ACTION A requires, if the ECST is inoperable, a verification by administrative means of the OPERABILITY of the CST within four hours and once per twelve hours thereafter. Additionally, the ECST is required to be returned to OPERABLE within the next seven days. This change maintains the CTS requirements in the ITS format.	3.7.6 Action A	3.7.1.3 Actions and 4.7.1.3.2

Table A – Administrative Changes
ITS Section 3.7 – Plant Systems

DOC No.		Description of Change	ITS Requirement	CTS Requirement
3.7.6	A.3	CTS 3.7.1.3 states "The emergency condensate storage tank, (ECST) shall be OPERABLE with a minimum contained volume of 110,000 gallons of water." ITS LCO 3.7.6 states, "The ECST shall be OPERABLE" and SR 3.7.6.1 states, "Verify the ECST contains ≥ 110,000 gal." This changes the CTS by moving the required volume of water in the ECST from the LCO to the Surveillance.	3.7.6 and SR 3.7.6.1	3.7.1.3
3.7.7	A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.7.8	A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.7.8	A.2	CTS 3.7.4.1 states, "Two service water loops (shared with Unit 2) shall be OPERABLE..." CTS 3.7.4.1 Applicability states, "Either Unit in MODES 1, 2, 3 or 4." CTS 3.7.4.1 Actions b, c, and e contain requirements to place both units in HOT STANDBY. ITS 3.7.8 does not contain references to both units. This changes CTS by deleting references to both units, and writing the requirements to apply to an individual unit in the Technical Specification.	None3.7.8	3.7.4.1
3.7.8	A.3	CTS 3.7.4.1 Action a states, The provisions of Specification 3.0.4 are not applicable once component cooling heat exchanger flows are throttled." ITS 3.7.8 does not contain this exemption. This changes CTS by deleting a specific exemption to CTS 3.0.4.	None3.7.8	3.7.4.1 Action a
3.7.8	A.4	CTS 3.7.4.1 includes a footnote, designated "**", which allowed a temporary exemption from the SW System LCO to allow system upgrades to be completed. ITS 3.7.8 does not contain the temporary exemption. This changes CTS by deleting a temporary exemption from CTS requirements.	NoneN/A	3.7.4.1 footnote "**"
3.7.8	A.5	CTS 3.7.4.1 does not contain an explicit reference to isolating SW flow to individual components. ITS Surveillance-SR 3.7.8.1 contains a Note which states, "Isolation of SW flow to individual components does not render the SW System inoperable." This changes CTS by adding an allowance is not explicitly stated in the CTS.	SR 3.7.8.1	None

Table A – Administrative Changes
ITS Section 3.7 – Plant Systems

DOC No.		Description of Change	ITS Requirement	CTS Requirement
3.7.8	A.6	CTS 4.7.4.1.c.1 requires verification that each automatic valve servicing safety related equipment actuates to its correct position on an actual or simulated safety injection signal. ITS SR 3.7.8.2 requires verification that each SW System automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal. This changes the CTS by adding the description that the valves must be in the flow path. Other changes are described in L.1, LA.5, LA.6, LA.8, and A.7.	SR 3.7.8.2	4.7.4.1.c.1
3.7.8	A.7	CTS 4.7.4.1.c.1 requires verification that each automatic valve servicing safety related equipment actuates to its correct position on an actual or simulated safety injection signal. CTS 4.7.4.1.c.2 requires verification that each automatic service water valve actuates to its correct position on an actual or simulated containment high-high signal. ITS SR 3.7.8.2 states, "Verify each SW System automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal." This changes the CTS by combining the requirements for testing the two separate signals into one SR.	SR 3.7.8.2	4.7.4.1.c.1 and 4.7.4.1.c.2
3.7.8	A.8	Not used.		
3.7.8	A.9	Not used CTS 3.7.4.1.a requires that each required service water loop include two OPERABLE service water pumps with their associated normal and emergency power supplies. CTS 1.18, the definition of OPERABLE-OPERABILITY, requires that for component OPERABILITY, normal and emergency power sources are capable of performing their related support function. ITS 3.7.8 does not contain power source requirements for the service water pumps. This changes CTS by addressing service water pump power source requirements through the definition of OPERABLE-OPERABILITY and through ITS 3.8.1, without specifically addressing power source requirements in CTS 3.7.4.1.	1.0 and 3.8.1	3.7.4.1.a
3.7.8	A.10	CTS 3.7.4.1 Action a states that when one service water pump is inoperable, the SW flow to the CC heat exchangers must be throttled in accordance with approved operating procedures to ensure the remaining service water pumps are capable of providing adequate flow to the RS heat exchangers. ITS 3.7.8 Actions A.1 and B.1 require throttling of the SW flow to the CC heat exchangers to obtain the required RS heat exchanger flow. This changes the CTS by deleting the requirement that the throttling be performed using approved operating procedures.	None 5.4.1	3.7.4.1 Action a
3.7.9	A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various

Table A – Administrative Changes
ITS Section 3.7 – Plant Systems

DOC No.		Description of Change	ITS Requirement	CTS Requirement
3.7.9	A.2	CTS LCO 3.7.5.1 states that the ultimate heat sinks shall be OPERABLE and describes the Service Water Reservoir parameters that must be met. ITS LCO 3.7.9 states the UHS shall be OPERABLE, and ITS SR 3.7.9.1 and SR 3.7.9.2 contain the parameter values for the Service Water Reservoir that must be met. This changes the CTS by moving the Service Water Reservoir parameter requirements to the SRs.	SR 3.7.9.1 and 3.7.9.2	3.7.5.1
3.7.10	A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.7.10	A.2	ITS SR 3.7.10.2 requires performing required MCR/ESGR EVS filter testing in accordance with the Ventilation Filter Testing Program (VFTP). CTS 4.7.7.1 does not include a VFTP, but the requirements that make up the VFTP are being moved to ITS 5.0. This changes CTS by requiring testing in accordance with the VFTP, whose requirements are being moved to ITS 5.0.	5.0 5.5.11	3.7.10.2
3.7.11	A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.7.12	A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.7.12	A.2	ITS SR 3.7.12.3 requires performing required ECCS PREACS filter testing in accordance with the Ventilation Filter Testing Program (VFTP). CTS 4.7.8.1 does not include a VFTP, but the requirements that makeup the VFTP are being moved to ITS 5.0. This changes CTS by requiring testing in accordance with the VFTP, whose requirements are being moved to ITS 5.0.	5.0 5.5.11	4.7.8.1
3.7.13	A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.7.14	None	N/A	N/A	N/A

Table A – Administrative Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.15 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.7.15 A.2	The ITS LCO 3.7.15 Note states, "The fuel building boundary may be opened intermittently under administrative control." This allowance is not explicitly stated in CTS 3.9.12, but plant practice allows opening of the boundary under administrative controls for specific purposes such as fuel building access.	3.7.15 LCO Note	None
3.7.15 A.3	CTS 3.9.12 refers to irradiated fuel movement within the "spent fuel pit." ITS 3.7.15 refers to recently irradiated fuel movement within the fuel building. This changes the CTS by changing the reference to the location of the fuel movement.	3.7.15	3.9.12
3.7.15 A.4	CTS 3.9.12 Action c. states, "The provisions of Specification 3.0.3, 3.0.4 and 4.0.4 are not applicable." ITS 3.7.15 ACTION Note states, "LCO 3.0.3 is not applicable." ITS LCO 3.0.4, the equivalent of CTS 3.0.4, states, "LCO 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, 3, and 4." ITS SR 3.0.4, the equivalent of CTS 4.0.4, states, "SR 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, 3, and 4." This changes CTS by deleting reference to an allowance already provided in a different portion of the ITS.	3.7.15 Actions Note, LCO 3.0.4 and SR 3.0.4	3.9.12 Action c
3.7.16 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.7.17 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.7.18 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various

Table L – Less Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.1 L.1	CTS 3.7.1.1, Action a, provides for one or more main steam safety valves (MSSVs) to be inoperable with the unit operating in MODES 1, 2, and 3. The ACTION requires that within 4 hours the MSSV(s) be restored to OPERABLE status, or the Power Range Neutron Flux High Setpoint Trip(s) to be reduced in accordance with the requirements of Table 3.7-1. ITS 3.7.1, ACTIONS Note, states “Separate Condition entry is allowed for each MSSV.” This changes the CTS by allowing separate condition entry for each inoperable MSSV.	3.7.1 Actions Note	3.7.1.1 Action a	4
3.7.1 L.2	CTS 3.7.1.1 states that with one or more MSSVs inoperable, reduce the Power Range Neutron Flux - High trip setpoint within 4 hours. ITS 3.7.1, Action A, states that with one or more steam generators with one MSSV inoperable and the Moderator Temperature Coefficient (MTC) zero or negative at all power levels, reduce THERMAL POWER to ≤ 52% RTP within 4 hours. ITS 3.7.1, Action B, states that with one or more steam generators with one MSSV inoperable and the MTC positive at any power levels or one or more steam generators with two or more MSSVs inoperable, reduce THERMAL POWER to ≤ the % RTP listed in Table 3.7.1-1 and reduce the Power Range Neutron Flux - High reactor trip setpoint to less than the limit in Table 3.7.1-1. This changes the CTS by not requiring the Power Range Neutron Flux - High trip setpoint be reduced when only one MSSV per steam generators is inoperable and the MTC is zero or negative at all power levels.	3.7.1 Actions	3.7.1.1	4
3.7.1 L.3	CTS 3.7.1.1 states that with one or more MSSVs inoperable, reduce the Power Range Neutron Flux - High trip setpoint within 4 hours. ITS 3.7.1, Action B, also requires the Power Range Neutron Flux - High trip setpoint to be reduced, but is modified by at Note stating that this action is only required in MODE 1. This changes the CTS by only requiring the Power Range Neutron Flux - High trip setpoint be reduced when in MODE 1.	3.7.1 Action B	3.7.1.1	4

Change Category:

- 1 - Relaxation of LCO Requirements
- 2 - Relaxation of Applicability
- 3 - Relaxation of Completion Time
- 4 - Relaxation of Required Action
- 5 - Deletion of Surveillance Requirement
- 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
- 7 - Relaxation Of Surveillance Frequency
- 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.1 L.4	Not used.	N/A	N/A	N/A
3.7.1 L.5	CTS LCO 3.7.1.1 Table 3.7-2 lists the orifice size for the main steam safety valves. ITS 3.7.1 does not contain this information. This changes the CTS by eliminating the diameter of the MSSVs from the Technical Specifications.	None	Table 3.7-2	1
3.7.2 L.1	CTS 3.7.1.5 is applicable in MODES 1, 2, and 3. ITS LCO 3.7.2 is applicable in MODE 1, and in MODES 2 and 3 except when all MSTVs are closed and deactivated. This changes the CTS by making the specification not applicable in MODES 2 and 3 when all MSTVs are closed and deactivated.	3.7.2 Applicability	3.7.1.5	2
3.7.2 L.2	CTS 3.7.1.5 Actions requires that when one main steam trip valve is inoperable in MODE 1, the valve is to be restored to Operable status within 4 hours or the unit is to be in Hot Shutdown (MODE 3) within the next 12 hours. ITS Action A allows 8 hours to restore an inoperable MSTV to OPERABLE status when in MODE 1, and an additional 6 hours to be in MODE 2. This changes the CTS Completion Time to restore an inoperable MSTV from 4 hours to 8 hours, and the required MODE from MODE 3 to MODE 2. The change in the time to enter MODE 3 from 16 hours to 14 hours is discussed in DOC M.5.	3.7.2 Action A	3.7.1.5 Actions	3
3.7.2 L.3	CTS 3.7.1.5 Actions allow only one MSTV to be inoperable in MODES 2 and 3. If more than one MSTV is inoperable; LCO 3.0.3 entry is required. ITS 3.7.2 Action C allows one or more main steam trip valves to be inoperable in MODES 2 and 3, and contains a Note which states, "Separate Condition entry is allowed for each MSTV." This changes the CTS by allowing more than one MSTV to be inoperable in MODES 2 and 3.	3.7.2 Action C Note	3.7.1.5 Actions	4

- Change Category:**
1 - Relaxation of LCO Requirements
2 - Relaxation of Applicability
3 - Relaxation of Completion Time
4 - Relaxation of Required Action
5 - Deletion of Surveillance Requirement
6 - Relaxation Of Surveillance Requirement Acceptance Criteria
7 - Relaxation Of Surveillance Frequency
8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.2 L.4	LCO 3.7.1.5 requires that the valves to be OPERABLE in MODES 1, 2, and 3. CTS 4.0.4 requires MSTVs to be tested prior to entry into the MODES of Applicability. ITS SR 3.7.2.1 contains a NOTE which allows entry into MODE 3 for the purpose of performing the required testing. This changes the CTS by allowing the plant to enter MODE 3 prior to the performance of the required testing.	SR 3.7.2.1 Note	3.7.1.5	7
3.7.3 None	N/A	N/A	N/A	N/A
3.7.4 None	N/A	N/A	N/A	N/A
3.7.5 L.1	CTS 4.7.1.2.c.1 and 4.7.1.2.c.2 require verification that each automatic valve actuates to its correct position and each AFW pump starts automatically upon receipt of an AFW actuation test signal. ITS SRs 3.7.5.3 and 3.7.5.4 will contain the same requirements, except the ITS requirements will permit the use of an actual or simulated test signal to initiate the component actuation.	SRs 3.7.5.3 and 3.7.5.4	4.7.1.2.c.1 and 4.7.1.2.c.2	4
3.7.5 L.2	CTS SR 4.7.1.2.b.1 provides for the surveillance testing of the AFW pumps. The requirement provides an exception to Specification 4.0.4 for the testing of the AFW steam turbine driven pump. Surveillance requirement 4.7.1.2.c.2 states at least once per 18 months verify each AFW pump will start automatically upon receipt of an auxiliary feedwater actuation test signal. A Note is added to ITS SRs 3.7.5.2 and 3.7.5.4 that allows a delay in the performance of required testing for the turbine driven AFW pump until the required steam pressure of 1005 psig is reached. This changes the CTS by providing an allowance for delaying the performance of required testing without requiring the turbine driven AFW pump to be declared inoperable.	SRs 3.7.5.3 and 3.7.5.4 Notes	4.7.1.2.b.1	6

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.5 L.3	CTS 3.7.1.2 Action a. requires all AFW pumps to be restored to an OPERABLE status within 72 hours for any condition of inoperability. ITS 3.7.5 ACTION A permits 7 days to restore the steam supply valve to an OPERABLE status when the steam turbine driven AFW pump is inoperable due to an inoperable steam supply valve or if one turbine driven AFW pump is inoperable following refueling when MODE 2 has not been entered.. This changes the CTS by extending the ACTION time from 72 hours to 7 days for the steam-driven pump in these conditions.	3.7.5 Action A	3.7.1.2 Action a	4
3.7.5 L.4	CTS SR 4.7.1.2.b requires the testing of the AFW pumps on a 92 day staggered test basis (STB). ITS SR 3.7.5.2 requires the AFW pumps tested in accordance with the Inservice Testing (IST) program. This changes the CTS requirements by allowing the testing of the AFW pumps on a three month basis and not specifically on a 92 day STB.	SR 3.7.5.2	4.7.1.2.b	7
3.7.5 L.5	CTS SR 4.7.1.2.d requires that the AFW system flow paths shall be demonstrated Operable prior to entry into MODE 3 following each COLD SHUTDOWN. This requires the flow testing of the AFW train from the ECST to the associated Steam Generator (SG). ITS SR 3.7.5.5 requires the flow path verification only when the unit has been in MODES 5, 6, or defueled for outages that last for a cumulative period of greater than 30 days. This change to the CTS eliminates performance of the SR for outages of less than 30 days.	SR 3.7.5.5	4.7.1.2.d	7

- Change Category:
1 - Relaxation of LCO Requirements
2 - Relaxation of Applicability
3 - Relaxation of Completion Time
4 - Relaxation of Required Action
5 - Deletion of Surveillance Requirement
6 - Relaxation Of Surveillance Requirement Acceptance Criteria
7 - Relaxation Of Surveillance Frequency
8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.5 L.6	CTS 3.7.1.2 ACTION c. states with three AFW pumps inoperable, immediately initiate corrective action to restore at least one AFW pump to OPERABLE status as soon as possible. This ACTION does not require the plant to be shutdown or provide an exception to Specification 3.0.3. ITS ACTION D requires with three inoperable AFW trains in MODES 1, 2, or 3 initiate action to restore one AFW trains to OPERABLE status immediately. This also adds a Note which state that LCO 3.0.3 and all other LCO Required Actions requiring MODE changes are suspended until one AFW train is OPERABLE. This changes the CTS requirements for the AFW system to not require a plant shutdown when all AFW trains are inoperable.	3.7.5 Action D	3.7.1.2 Action c	4
3.7.5 L.7	CTS Surveillance Requirement 4.7.1.2.c.1 requires the verification of the actuation for each AFW automatic valve in the flow path to its correct position. This is applicable for each valve on an AFW actuation test signal at least once per 18 months when the plant is shutdown. ITS SR 3.7.5.3 requires verifying that each AFW automatic valve not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal once every 18 months. This changes the CTS by only requiring the testing of AFW valves that are not locked, sealed or otherwise secured in position.	SR 3.7.5.3	4.7.1.2.c.1	6

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.5 L.8	CTS 3.7.1.2 ACTION a. states, “With one AFW pump inoperable, restore the required AFW pumps to OPERABLE status within 72 hours.” ITS 3.7.5 ACTION A states, “One steam supply to turbine driven pump inoperable, or one turbine driven AFW pump inoperable following refueling, restore the affected equipment to OPERABLE status within 7 days.” ACTION B requires, “One AFW train inoperable in MODE 1, 2, or 3 for any reason other than Condition A, restore AFW train to OPERABLE status within 72 hours.” ACTIONS A and B have a modified Completion Time that states, “10 days from the discovery of failure to meet the LCO.” This changes the CTS by allowing up to 10 days to have a combination of inoperable AFW trains.	3.7.5 Actions A and B	3.7.1.2 Action a	3
3.7.5 L.9	CTS 3.7.1.2 ACTION b. states that with two AFW pumps inoperable, be in HOT STANDBY within 6 hours and in HOT SHUTDOWN within the following 6 hours. ITS Action C states, in part, that with two AFW trains inoperable, be in MODE 3 in 6 hours and MODE 4 in 18 hours. This changes the CTS by allowing 18 hours instead of 12 hours to be in MODE 4.	3.7.5 Action C	3.7.1.2 Action b	3
3.7.6 L.1	CTS 3.7.1.2, Action b. states that if an inoperable ECST is not restored to OPERABLE status within 7 days, the plant must be in HOT SHUTDOWN within 24 hours. ITS 3.7.6, Action B, states that if an inoperable ECST is not restored to OPERABLE status within 7 days, the plant must be in MODE 3 within 6 hours and MODE 4 without reliance on the steam generators for heat removal within 24 hours. This changes the time to be in MODE 4 without reliance on the steam generators for heat removal from 12 hours to 24 hours. The addition of the MODE 3 Completion Time is discussed in DOC M.2. The addition of the condition to be in MODE 4 without reliance on the steam generators for heat removal is discussed in DOC M.1.	3.7.6 Action B	3.7.1.2 Action b	3

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.7 L.1	CTS Table 4.7-1 item #1 requires that the gross activity determination be completed at least once per 72 hours. ITS 3.7.7 does not require any sampling to be performed to determine the gross activity of the secondary coolant. This changes the CTS by deleting the requirement for gross activity determination once per 72 hours.	None	Table 4.7-1, Item 1	5
3.7.8 L.1	CTS 4.7.4.1.c.1 and 4.7.4.1.c.2 require verification that SW System automatic valves actuate to their correct position. ITS SR 3.7.8.2 requires verification that SW System automatic valves in the flow path that are not locked, sealed or otherwise secured in position, actuate to the correct position on an actual or simulated actuation signal. This changes the CTS by exempting valves that are locked, sealed, or otherwise secured in position from the verification.	SR 3.7.8.2	4.7.4.1.c.1 and 4.7.4.1.c.2	
3.7.8 L.2	Not used.	N/A	N/A	N/A
3.7.8 L.3	In the event of an inoperable AC electrical power source, ITS 3.8.1 Actions A and B allow 24 hours (for an inoperable offsite circuit) or 4 hours (for an inoperable emergency diesel generator) before requiring that the affected service water (SW) pump be declared inoperable only when the redundant SW pump is inoperable. This is less restrictive than CTS which would require declaring the affected SW pump inoperable immediately in the event one of its AC electrical power sources were inoperable.	3.8.1 Actions A and B	3.7.4.1.a	3
3.7.9 None	N/A	N/A	N/A	N/A

- Change Category:
1 - Relaxation of LCO Requirements
2 - Relaxation of Applicability
3 - Relaxation of Completion Time
4 - Relaxation of Required Action
5 - Deletion of Surveillance Requirement
6 - Relaxation Of Surveillance Requirement Acceptance Criteria
7 - Relaxation Of Surveillance Frequency
8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.10 L.1	CTS 4.7.7.1 states, “Each control room emergency ventilation system shall be demonstrated OPERABLE: a. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 10 hours with the heaters on.” ITS SR 3.7.10.1 states, “Operate each required MCR/ESGR EVS train for ≥ 10 continuous hours with the heaters operating.” The Frequency is every 31 days. This changes the CTS by removing the STAGGERED TEST BASIS requirement from the 31 day Frequency. The change moving details of the test to the Bases is addressed in a removed detail discussion of change.	SR 3.7.10.1	4.7.7.1	7
3.7.10 L.2	CTS 4.7.7.1 states, “Each control room emergency ventilation system shall be demonstrated OPERABLE:...d. At least once per 18 months by:...2. Verifying that the normal air supply and exhaust are automatically shutdown on a Safety Injection Actuation Test Signal.” ITS SR 3.7.10.3 states, “Verify each LCO 3.7.10.a MCR/ESGR EVS train actuates on an actual or simulated actuation signal.” The Frequency is every 18 months. This changes the CTS by allowing the automatic actuation to be verified by either an actual or simulated actuation signal. The change moving the detail of what is verified by the surveillance and how it is performed to the Bases is addressed in a removed detail discussion of change.	SR 3.7.10.3	4.7.7.1d.2	6

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.10 L.3	CTS 4.7.7.1.d.2 states, “Each control room emergency ventilation system shall be demonstrated OPERABLE:...At least once per 18 months by:...verifying that the system maintains the control room at a positive pressure of ≥ 0.04 inch W.G. relative to the outside atmosphere at a system flow rate of $1000\text{ cfm} \pm 10\%$.” ITS SR 3.7.10.4 requires the same surveillance be performed every 18 months on a STAGGERED TEST BASIS. This changes the CTS by requiring the surveillance be performed every 18 months on a STAGGERED TEST BASIS instead of every 18 months. The change in the positive pressure required is addressed by DOC 3.7.10 - M.5.	SR 3.7.10.4	4.7.7.1.d.2	7
3.7.10 L.4	CTS 3.7.7.1 Action a states, “With either the emergency ventilation system or the bottled air pressurization system inoperable, restore the inoperable system to OPERABLE status within 7 days...” CTS 3.7.7.1 Action b states, “With both the emergency ventilation system and the bottled air pressurization system inoperable, restore at least one of these systems to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.” ITS 3.7.10 Condition A states, “One required LCO 3.7.10.a or 3.7.10.b MCR/ESGR EVS train inoperable.” ITS Required Action A.1 states, “Restore train to OPERABLE status,” within 7 days. ITS 3.7.13, “MCR/ESGR Bottled Air System,” has a similar Required Action A.1. This changes the CTS by allowing portions of both the MCR/ESGR bottled air system and the MCR/ESGR EVS to be inoperable for 7 days rather than 24 hours. Changes associated with identifying system train inoperabilities rather than whole systems are addressed by DOC M.2. Changes associated with not allowing both systems to be inoperable for 24 hours are addressed by DOC M.3. Changes associated with the MCR/ESGR bottled air system are addressed in ITS 3.7.13.	3.7.10 Action A	3.7.7.1 Actions a and b	3

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.10 L.5	The ITS LCO 3.7.10 Note states, "The MCR/ESGR boundary may be opened intermittently under administrative control." This allowance is not explicitly stated in CTS 3.7.7.1. This changes CTS by explicitly allowing the MCR/ESGR boundary to be opened intermittently under administrative control.	3.7.10 LCO Note	None	1
3.7.11 L.1	CTS 3.7.7.1 Action c allows 7 days to restore an inoperable air conditioning subsystem to OPERABLE status. ITS 3.7.11 allows 30 days to restore an inoperable air conditioning subsystem to OPERABLE status. This changes the CTS by increasing the time allowed to restore the inoperable components from 7 days to 30 days.	3.7.11	3.7.7.1 Action c	3
3.7.12 L.1	CTS 4.7.8.1 states, "Each ECCS PREACS train shall be demonstrated OPERABLE: a. At least once per 31 days on a STAGGERED TEST BASIS by: 1. Initiating, from the control room, Safeguards Area exhaust flow and Auxiliary Building Central exhaust flow through the auxiliary building HEPA filter and charcoal adsorber assembly and verifying that the ECCS PREACS train operates for at least 10 hours with the heater on." ITS SR 3.7.12.1 states, "Operate each ECCS PREACS train for ≥ 10 continuous hours with the heaters operating." The Frequency is every 31 days. This changes the CTS by removing the STAGGERED TEST BASIS requirement from the 31 day frequency. The change moving details of the test to the Bases is addressed in a removed detail discussion of change.	SR 3.7.12.1	4.7.8.1.a.1	3

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.12 L.2	CTS 4.7.8.1.d.2 requires demonstrating the SAVS OPERABLE every 18 months by, “Verifying that on a Containment Hi-Hi Test Signal, the system automatically diverts Safeguards Area exhaust flow...” ITS SR 3.7.12.4 states, “Verify Safeguards Area exhaust flow is diverted and each Auxiliary Building filter bank is actuated on an actual or simulated actuation signal.” The frequency is every 18 months. This changes the CTS by allowing the automatic actuation to be verified by either an actual or simulated actuation signal. The change moving the detail of what is verified by the surveillance and how it is performed to the Bases is addressed in DOC LA.3.	SR 3.7.12.4	4.7.8.1.d.2	6
3.7.13 L.1	CTS 3.7.7.1 Action a states, “With either the emergency ventilation system or the bottled air pressurization system inoperable, restore the inoperable system to OPERABLE status within 7 days...” CTS 3.7.7.1 Action b states, “With both the emergency ventilation system and the bottled air pressurization system inoperable, restore at least one of these systems to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.” ITS 3.7.13 Condition A states, “One required MCR/ESGR bottled air system train inoperable.” ITS Required Action A.1 states, “Restore train to OPERABLE status,” within 7 days. ITS 3.7.10, “MCR/ESGR EVS-MODES 1, 2, 3, and 4,” has a similar Required Action A.1. This changes the CTS by allowing portions of both the MCR/ESGR bottled air system and the MCR/ESGR EVS to be inoperable for 7 days rather than 24 hours. Changes associated with identifying system train inoperabilities rather than whole systems are addressed by DOC M.2. Changes associated with not allowing both systems to be inoperable for 24 hours are addressed by DOC M.3. Changes associated with the MCR/ESGR bottled air system are addressed in ITS 3.7.13.	3.7.13 Action A	3.7.7.1 Actions a and b	3

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.13 L.2	CTS 4.7.7.1 states, “Each control room emergency ventilation system shall be demonstrated OPERABLE:...d. At least once per 18 months by:...2. Verifying that the normal air supply and exhaust are automatically shutdown on a Safety Injection Actuation Test Signal.” ITS SR 3.7.13.3 states, “Verify each MCR/ESGR bottled air system train actuates on an actual or simulated actuation signal.” The Frequency is every 18 months. This changes the CTS by allowing the automatic actuation to be verified by either an actual or simulated actuation signal. The change moving the detail of what is verified by the surveillance and how it is performed to the Bases is addressed in a removed detail discussion of change.	SR 3.7.13.3	4.7.7.1.d.2	6
3.7.13 L.3	CTS 4.7.7.2.b states, “Each bottled air pressurization system shall be demonstrated OPERABLE :...At least once per 18 months by verifying that the system will supply at least 340 cfm of air to maintain the control room at a positive pressure of ≥ 0.05 inch W.G. relative to the outside atmosphere for at least 60 minutes.” ITS SR 3.7.13.4 requires the same surveillance be performed every 18 months on a STAGGERED TEST BASIS. This changes the CTS by requiring the surveillance be performed every 18 months on a STAGGERED TEST BASIS instead of every 18 months.	SR 3.7.13.4	4.7.7.2.b	7

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.13 L.4	CTS 3.7.7.1 Action a states, “With either the emergency ventilation system or the bottled air pressurization system inoperable, restore the inoperable system to OPERABLE status within 7 days...” CTS 3.7.7.1 Action b states, “With both the emergency ventilation system and the bottled air pressurization system inoperable, restore at least one of these systems to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.” ITS 3.7.13 Condition A states, “One required MCR/ESGR bottled air system train inoperable.” ITS Required Action A.1 states, “Restore train to OPERABLE status,” within 7 days. ITS 3.7.10, “MCR/ESGR EVS-MODES 1, 2, 3, and 4,” has a similar Required Action A.1. This changes the CTS by allowing portions of both the MCR/ESGR bottled air system and the MCR/ESGR EVS to be inoperable for 7 days rather than 24 hours. Changes associated with identifying system train inoperabilities rather than whole systems are addressed by DOC M.2. Changes associated with not allowing both systems to be inoperable for 24 hours are addressed by DOC M.3. Changes associated with the MCR/ESGR bottled air system are addressed in ITS 3.7.13.	3.7.13 Action A	3.7.7.1 Actions a and b	3
3.7.13 L.5	The ITS LCO 3.7.13 Note states, "The MCR/ESGR boundary may be opened intermittently under administrative control." This allowance is not explicitly stated in CTS 3.7.7.1. This changes CTS by explicitly allowing the MCR/ESGR boundary to be opened intermittently under administrative control.	3.7.13 LCO Note	None	5
3.7.14 None	N/A	N/A	N/A	N/A

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.15 L.1	CTS 3.9.12 Applicability includes, “During irradiated fuel movement within the spent fuel pit.” ITS 3.7.15 Applicability is, “During movement of recently irradiated fuel assemblies in the fuel building.” All references in CTS 3.9.12 to irradiated fuel are changed to "recently" irradiated fuel. This changes the CTS by eliminating requirements for the FBVS during movement of fuel that is not recently irradiated.	3.7.15 Applicability	3.9.12 Applicability	2
3.7.15 L.2	CTS 4.9.12 states, “The above required fuel building ventilation system shall be demonstrated OPERABLE and discharging through at least one auxiliary building HEPA filter and charcoal adsorber assembly: a. At least once per 31 days by initiating flow through the HEPA filter and charcoal adsorber assembly for 15 minutes...c. By performance of the Surveillance Requirements of Specification 4.7.8.1 b, c, d, e, and f.” CTS LCO 3.9.12 and CTS Action a refer to the HEPA filter and charcoal adsorber assembly of the FBVS. ITS 3.7.15 does not include these requirements. This changes CTS by deleting the testing requirements for the fuel building filtration systems.	None	4.9.12.a and 4.9.12.c	5
3.7.15 L.3	CTS 3.9.12 Applicability includes, “b. During crane operation with loads over irradiated fuel in the spent fuel pit.” CTS 3.9.12 Actions “a” and “b” address actions to take during “crane operation with loads over the spent fuel pit.” ITS 3.7.15 does not include these requirements. This changes CTS by not requiring requirements be met for a portion of the current applicability.	None	3.9.12 Applicability b, 3.9.12 Actions a and b	2

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.16 L.1	CTS 3.9.11 states that the requirements on spent fuel pit water level are applicable, “Whenever irradiated fuel assemblies are in the spent fuel pit.” CTS 4.9.11 requires the water level in the spent fuel pit to be verified every 7 days when irradiated fuel assemblies are in the spent fuel pit. ITS 3.7.16 is applicable, “During movement of irradiated fuel assemblies in the fuel storage pool.” ITS SR 3.7.16.1 requires verification of the spent fuel pool water level every 7 days. This changes the CTS by restricting the applicability of the spent fuel pool water level specification and performance of the Surveillance to during the movement of irradiated fuel assemblies in the fuel storage pool.	3.7.16 Applicability and SR 3.7.16.1	3.9.11 and 4.9.11	2
3.7.16 L.2	CTS 3.9.11 ACTION states that when the spent fuel pool water level is not met, suspend all movement of fuel assemblies and crane operations with loads in the spent fuel pit areas and place the load in a safe condition, and restore the water level to within its limit within 4 hours. The CTS also states that Specification 3.0.3 is not applicable. ITS 3.7.16 Required Action A.1 states that when fuel storage pool water level is not within limit, immediately suspend movement of irradiated fuel assemblies in the fuel storage pool. A NOTE to Required Action A.1 states that LCO 3.0.3 is not applicable. This changes the CTS requiring the suspension of movement of only irradiated fuel, by eliminating actions related to crane operation over the spent fuel pool and eliminating the requirement to restore the water level within 4 hours.	3.7.16 Action A and Action A Note	3.9.11 Action	4
3.7.17 None	N/A	N/A	N/A	N/A
3.7.18 None	N/A	N/A	N/A	N/A

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table M – More Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.		Description of Change	ITS Requirement	CTS Requirement
3.7.1	M.1	CTS 3.7.1.1 states that the provisions of Specification 3.0.4 are not applicable. ITS 3.7.1 does not contain an exception to LCO 3.0.4. However, ITS SR 3.7.1.1 contains a Note which states, "Only required to be performed in MODES 1 and 2." This changes the CTS by eliminating a general exception to 3.0.4 with a specific exception to allow entry into MODES in the Applicability to allow performance of a Surveillance.	SR 3.7.1.1 Note	3.7.1.1
3.7.1	M.2	CTS 3.7.1.1 Action a states, in part, that if an inoperable main steam safety valve is not restored to OPERABLE status or the power range neutron flux high setpoint is not reduced to the specified value within 4 hours, then the unit must be placed in at least HOT STANDBY within the next 6 hours and COLD SHUTDOWN within the following 30 hours. ITS 3.7.1 Action C states that if the Required Actions and associated Completion Times are not met, or if one or more steam generators have ≥ 4 MSSV inoperable, the unit must be placed in Mode 3 within 6 hours and Mode 4 within 12 hours. This changes the CTS by providing specific actions for one or more steam generators with ≥ 4 MSSVs inoperable and requiring the unit to be in MODE 4 within 12 hours instead of COLD SHUTDOWN (MODE 5) within 36 hours.	3.7.1 Action C	3.7.1.1 Action a
3.7.2	M.1	CTS 3.7.1.5 ACTIONS for MODES 2 and 3 states subsequent operation in MODES 1, 2, or 3 may proceed provided the inoperable MSTV is maintained closed. If the valve is not maintained closed, the unit must be in HOT SHUTDOWN (MODE 3) within the next 12 hours. ITS 3.7.2 Required Actions C.1 requires an inoperable MSTV to be closed within 8 hours and Required Action C.2 requires the valve to be verified closed once per 7 days. Otherwise, Action D requires the unit must be in MODE 3 within 6 hours and MODE 4 within 12 hours. This changes the CTS by specifying a time within which the inoperable MSTV must be closed (8 hours), requiring periodic verification that the inoperable MSTV is closed, requiring the unit to be in MODE 3 within 6 hours if the Required Actions and Associated Completion Times are not met, and requiring the unit to be in MODE 4 within 12 hours if the Required Actions and associated Completion Times are not met.	3.7.2 Actions C and D	3.7.1.5
3.7.2	M.2	The CTS does not require testing to verify that the MSTV close on an actuation signal. ITS SR 3.7.2.2 requires verification that each MSTV actuates to the isolation position on an actual or simulated actuation signal. This changes the CTS by requiring verification that each MSTV actuates to the isolation position on an actual or simulated actuation signal.	SR 3.7.2.2	None

Table M – More Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.2 M.3	CTS 3.7.1.5, Actions for MODES 2 and 3, allows continued operation in MODES 1, 2, or 3 with an inoperable, closed MSTV and states that the provisions of specification 3.0.4 are not applicable. The specification 3.0.4 exception allows MODE transitions while relying on the CTS 3.7.1.5 Action. ITS 3.7.2, Action C, applies with one or more MSTVs inoperable and does not allow operation in MODE 1 and does not provide an exception to ITS LCO 3.0.4, so MODE transition to MODE 1 is not allowed. This changes the CTS by not allowing operation in MODE 1 with an inoperable, closed MSTV.	3.7.2 Action C	3.7.1.5 Actions
3.7.2 M.4	CTS 3.7.1.5 ACTION for MODE 1 specifies that POWER OPERATION may continue when one MSTV is inoperable if the inoperable valve is restored to OPERABLE status or closed within 4 hours. ITS 3.7.2 ACTION A requires restoring the inoperable valve to OPERABLE status within 8 hours. The ITS does not provide any allowance for continued operation by closing the valve while in MODE 1. This changes the CTS by deleting the allowance for continued operation in MODE 1 with a closed, inoperable MSTV.	3.7.2	3.7.1.5 Actions
3.7.2 M.5	CTS 3.7.1.5 Actions requires that when one main steam trip valve is inoperable in MODE 1, the valve is to be restored to Operable status within 4 hours or the unit is to be in MODE 3 within the next 12 hours. ITS Action A allows 8 hours to restore an inoperable main steam trip valve to OPERABLE status when in MODE 1, and an additional 6 hours to be in MODE 3. This changes the CTS allowed outage time to be in MODE 3 with an inoperable MSTV from 16 hours to 14 hours. The change in time from 4 hours to 8 hours to restore an inoperable MSTV is discussed in DOC L.2.	3.7.2 Action A	3.7.1.5 Actions
3.7.3 M.1	CTS does not have any requirement for Main Feedwater Isolation Valves (MSIVs), Main Feedwater Pump Discharge Valves (MFPDVs), Main Feedwater Regulating Valves (MFRVs) and Main Feedwater Regulating Bypass Valves to be OPERABLE, other than a requirement for an actuation signal to be supplied to the valves in CTS 3.3.2.1. ITS 3.7.3 requires the MFIVs, MFPDVs, MFRVs, and MFRBVs be OPERABLE in MODES 1, 2, and 3. This changes the CTS by incorporating the requirements of ITS 3.7.3.	3.7.3	None
3.7.4 M.1	CTS does not have any Technical Specification requirements for atmospheric dump valves. ITS 3.7.4 specifies the requirements for the “Steam Generator Power Operated Relief Valves,” SGPORVs, consistent with the requirements of ISTS 3.7.4, “Atmospheric Dump Valves.” This changes the CTS by incorporating the requirements of ITS 3.7.4.	3.7.4	None

Table M – More Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.5 M.1	CTS LCO 3.7.1.2 is applicable in Modes 1, 2, and 3. ITS LCO 3.7.5 is applicable in Modes 1, 2, and 3, and MODE 4 when the steam generator is relied upon for heat removal for the system. To support this change in the Applicability, the following additional requirements are added to the CTS: <ul style="list-style-type: none">• A note is added to the LCO that requires an AFW train, supported by a motor driven pump, to be operable in MODE 4;• CTS Action a states that with an inoperable AFW pump, restore the pump within 72 hours or be in MODE 3 within 6 hours. ITS Action C adds the requirement to be in MODE 4 within 18 hours.• A new ACTION E is added which requires an immediate action to restore a required inoperable AFW train to OPERABLE status when the SG is required in MODE 4; and• The addition of Notes to ITS SRs 3.7.5.3 and 3.7.5.4 which state the requirements are not applicable in MODE 4 when a steam generator is relied upon for heat removal.	3.7.5	3.7.1.2
3.7.6 M.1	The CTS requirements on the ECST are applicable in MODES 1, 2, and 3. ITS 3.7.6 is applicable in MODES 1, 2, and 3, and in addition, MODE 4 when a SG is relied upon for heat removal. Consistent with this change in applicability, the phrase “Be in MODE 4, without reliance on steam generator for heat removal” is added to ITS ACTION B. This changes the CTS requirements by requiring the ECST to be OPERABLE in MODE 4 when a SG is relied upon for heat removal.	3.7.6 Applicability	3.7.1.3 Applicability
3.7.6 M.2	CTS ACTION b requires the plant must be in HOT SHUTDOWN within the next twelve hours if the ECST is inoperable for seven days. ITS Action B states “Required Action and associated Completion Time not met, be in MODE 3 within six hours and MODE 4 within 24 hours.” This changes the CTS to require the plant to be in MODE 3 within six hours. The change in the time to reach MODE 4 is discussed in DOC L.1.	3.7.6 Action B	3.7.1.3 Action b
3.7.7 M.1	CTS Table 4.7-1 item #2 allows the sampling frequency for the DOSE EQUIVALENT I-131 to be extended to once per 6 months whenever the gross activity determination indicates the iodine concentrations are below 10% of the allowable limits. ITS SR 3.7.7.1 does not provide for this extended time frame for determining the DOSE EQUIVALENT I-131 and requires verification of specific activity of the secondary coolant every 31 days whenever the unit is in MODES 1, 2, 3, and 4. This changes the CTS by deleting CTS Table 4.7-1, item 2.b, and the qualifying statement of, “whenever the gross activity determination indicates iodine concentrations greater than 10% of the allowable limit.”	SR 3.7.7.1	Table 4.7-1, Item 2

Table M – More Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.8 M.1	CTS 4.7.4.1 does not contain a requirement to verify each SW System pump starts automatically on an actuation signal. ITS SR 3.7.8.3 states, “Verify each SW pump starts automatically on an actual or simulated actuation signal.” This changes the CTS by adding a SR to test the SW Systems pumps.	SR 3.7.8.3	None
3.7.9 None	N/A	N/A	N/A
3.7.10 M.1	CTS 3.7.7.1 requires the emergency ventilation system to be OPERABLE. ITS 3.7.10 states, “The following MCR/ESGR EVS trains shall be OPERABLE: a. Two MCR/ESGR Emergency Ventilation System (EVS) trains; and b. One MCR/ESGR EVS train on the other unit.” This changes CTS by specifying the number and type of MCR/ESGR EVS trains required to be OPERABLE.	3.7.10	3.7.7.1
3.7.10 M.2	CTS 3.7.7.1 Action a states, “With either the emergency ventilation system or the bottled air pressurization system inoperable, restore the inoperable system to OPERABLE status within 7 days...” ITS 3.7.10 Condition A states, “One required LCO 3.7.10.a or 3.7.10.b MCR/ESGR EVS train inoperable.” ITS Required Action A.1 states, “Restore train to OPERABLE status,” within 7 days. This changes CTS by allowing only one required train of the MCR/ESGR EVS to be inoperable for 7 days, but not allowing the entire MCR/ESGR EVS to be inoperable for 7 days.	3.7.10 Action A	3.7.7.1 Action a
3.7.10 M.3	CTS 3.7.7.1 Action b states, “With both the emergency ventilation system and the bottled air pressurization system inoperable, restore at least one of these systems to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.” ITS 3.7.10 Required Action B.1 requires that with two or more required LCO 3.7.10.a or LCO 3.7.10.b MCR/ESGR EVS trains inoperable due to an inoperable MSR/ESGR boundary in MODE 1, 2, 3, or 4, restore the MCR/ESGR boundary to OPERABLE status within 24 hours. The Bases for Required Action B.1 state, “During the period that the MCR/ESGR boundary is inoperable, appropriate compensatory measures (consistent with the intent of GDC 19) should be utilized to protect control room operators from potential hazards such as radioactive contamination. Preplanned measures should be available to address these concerns for intentional and unintentional entry into the condition.” ITS 3.7.10 Condition C requires that if the Required Actions and associated Completion Time of Condition A or B are not met, the unit be in MODE 3 in 6 hours, and MODE 5 in 36 hours. ITS LCO 3.0.3 allows 7 hours to place the unit in MODE 3, and 37 hours to place the unit in MODE 5. This changes CTS by not providing a Completion time of 24 hours when the two or more required MCR/ESGR EVS trains and two or more required MCR/ESGR bottled air trains are inoperable at the same time, except for an inoperable MCR/ESGR boundary. This also changes CTS by requiring compensatory measures be taken while the MCR/ESGR boundary is inoperable. This results in allowing 23 fewer hours to place the unit in MODE 3 and MODE 5, and requires additional compensatory actions be taken.	3.7.10 Actions B and C, LCO 3.0.3	3.7.7.1 Action b

Table M – More Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.10 M.4	CTS 3.7.7.1 Action a states, “With either the emergency ventilation system or the bottled air pressurization system inoperable, restore the inoperable system to OPERABLE status within 7 days...” ITS 3.7.10 Required Action D.1 requires that with two or more required LCO 3.7.10.a or LCO 3.7.10.b MCR/ESGR EVS trains inoperable for reasons other than Condition B, enter LCO 3.0.3 immediately. ITS LCO 3.0.3 allows 7 hours to place the unit in MODE 3, and 37 hours to place the unit in MODE 5. This changes CTS by not providing a Completion time of 7 days when the two or more required MCR/ESGR EVS trains are inoperable resulting in less time allowed to place the unit in MODE 3 and MODE 5.	3.7.10 Action D, LCO 3.0.3	3.7.7.1 Action a
3.7.10 M.5	CTS 4.7.7.1 states, “Each control room emergency ventilation system shall be demonstrated OPERABLE:...d. At least once per 18 months by:...2. Verifying that the normal air supply and exhaust are automatically shutdown on a Safety Injection Actuation Test Signal.” ITS SR 3.7.10.3 states, “Verify each LCO 3.7.10.a MCR/ESGR EVS train actuates on an actual or simulated actuation signal.” The Frequency is every 18 months. This changes CTS by requiring verification of automatic actuation of each LCO 3.7.10.a MCR/ESGR EVS train on an actual or simulated actuation signal. The change moving details of how the test is performed are addressed in a removed detail discussion of change.	SR 3.7.10.3	4.7.7.1
3.7.10 M.6	CTS 4.7.7.1.d.3 uses a reference of “outside atmosphere” with regard to the pressure at which the emergency ventilation system must maintain the control room. ITS SR 3.7.10.4 uses the reference “adjacent areas.” This changes the reference used when determining whether the MCR/ESGR envelope has been sufficiently pressurized to a more specific reference.	SR 3.7.10.4	4.7.7.1.d.3
3.7.10 M.7	CTS 4.7.7.1.d.3 specifies positive pressure and flow requirements that must be met by the control room emergency ventilation system. ITS SR 3.7.10.4 states the positive pressure and flow requirements that must be met by each required train of the MCR/ESGR EVS. This changes the CTS by specifying that the each required train of the MCR/ESGR EVS must be capable of performing the specified Surveillance Requirement.	SR 3.7.10.4	4.7.7.1.d.3
3.7.11 M.1	ITS 3.7.11 Applicability includes, “During movement of recently irradiated fuel assemblies.” ITS 3.7.11 Condition C is entered when the Required Action and associated Completion Time of Condition A is not met during movement of recently irradiated fuel assemblies. The Required Actions require either placing an OPERABLE MCR/ESGR ACS subsystem in operation or suspending movement of recently irradiated fuel assemblies. Condition D is entered when less than 100% of the MCR/ESGR ACS cooling equivalent to a single OPERABLE MCR/ESGR ACS subsystem is available during movement of recently irradiated fuel. Required Action D.1 requires suspending movement of recently irradiated fuel assemblies immediately. This changes CTS by adding an additional Applicability criteria and associated Conditions and Required Actions.	3.7.11 Applicability and Actions	None

Table M – More Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.11 M.2	CTS 4.7.7.3 states, “Each control room air-conditioning system shall be demonstrated OPERABLE at least once per 12 hours by verifying that the control room air temperature is less than or equal to 120°F.” ITS SR 3.7.11.1 states, “Verify each MCR/ESGR ACS chiller has the capability to remove the design heat load.” The Frequency is every 18 months on a STAGGERED TEST BASIS. This changes CTS by replacing a temperature verification with a test to verify each MCR/ESGR ACS chiller has the capability to remove the design heat load.	SR 3.7.11.1	4.7.7.3
3.7.11 M.3	CTS 3.7.7.1 Action d states, “With both the air conditioning systems inoperable, restore at least one system to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.” ITS 3.7.11 Condition E states that with less than 100% of the MCR/ESGR ACS cooling equivalent to a single OPERABLE MCR/ESGR ACS subsystem available in MODES 1, 2, 3, or 4, enter LCO 3.0.3 immediately. ITS LCO 3.0.3 allows 7 hours to place the unit in MODE 3, and 37 hours to place the unit in MODE 5. This changes the CTS by allowing 23 hours less to place the unit in MODE 3 and MODE 5 if the equivalent of one MCR/ESGR ACS subsystem is not available. The change in the criteria for the systems is addressed in another more restrictive discussion of change.	3.7.11 Action E and LCO 3.0.3	3.7.7.1 Action d
3.7.12 M.1	CTS LCO 3.7.8.1 states, “Two safeguards area ventilation systems (SAVS) shall be OPERABLE with: a. one SAVS exhaust fan b. one auxiliary building HEPA filter and charcoal adsorber assembly (shared with Unit 2).” In the Unit 2 CTS, the reference to the other unit states, “(shared with Unit 1).” CTS ACTION addresses the inoperability of one SAVS. CTS 4.7.8.1 states, “Each SAVS system shall be demonstrated OPERABLE.” CTS 4.7.8.1.a.1 requires, “...verifying that the SAVS operates for at least 10 hours with the heater on.” ITS 3.7.12 states, “Two ECCS PREACS trains shall be OPERABLE.” ITS Condition A addresses the inoperability of one ECCS PREACS train. ITS SR 3.7.12.1 and SR 3.7.12.2 require the respective surveillances be performed on each ECCS PREACS train. This changes CTS by applying the requirements to all the components that constitute an ECCS PREACS train, rather than just the SAVS.	3.7.12 and SRs 3.7.12.1 and 3.7.12.2	3.7.8.1 and 4.7.8.1

Table M – More Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.12 M.2	ITS SR 3.7.12.5 states, “Verify one ECCS PREACS train can maintain a negative pressure relative to atmospheric pressure during the post accident mode of operation.” The Frequency is 18 months on a STAGGERED TEST BASIS. ITS LCO 3.7.12 includes a NOTE that states, “The ECCS pump room boundary openings not open by design may be opened intermittently under administrative control.” ITS Required Action B.1 requires that when two ECCS PREACS trains are inoperable due to an inoperable ECCS pump room boundary, that the ECCS pump room boundary be restored to OPERABLE status within 24 hours. This changes CTS by adding a requirement that equipment be able to provide a negative pressure relative to atmospheric pressure for the required ECCS PREACS areas. The ITS LCO 3.7.12 NOTE states allowed exceptions to the requirements of ITS SR 3.7.12.5. The ITS Required Action B.1 provides a 24 hour Completion Time in case two ECCS PREACS trains are inoperable due to an inoperable ECCS pump room boundary.	3.7.12.5	None
3.7.13 M.1	CTS 3.7.7.1 requires the bottled air pressurization system to be OPERABLE. ITS 3.7.13 states, “Three MCR/ESGR bottled air system trains shall be OPERABLE.” This changes CTS by specifying the number of MCR/ESGR bottled air system trains required to be OPERABLE.	3.7.13	3.7.7.1
3.7.13 M.2	CTS 3.7.7.1 Action a states, “With either the emergency ventilation system or the bottled air pressurization system inoperable, restore the inoperable system to OPERABLE status within 7 days...” CTS 3.7.7.1 Action b states, “With both the emergency ventilation system and the bottled air pressurization system inoperable, restore at least one of these systems to OPERABLE status within 24 hours.” ITS 3.7.13 Condition A states, “One required MCR/ESGR bottled air system train inoperable.” ITS Required Action A.1 states, “Restore train to OPERABLE status,” within 7 days. ITS 3.7.13 Required Action C.1 is added, allowing 24 hours to restore at least two MCR/ESGR bottled air system trains to OPERABLE status if two or more required trains are inoperable for reasons other than an inoperable MCR/ESGR boundary. The Bases for Required Action C.1 state, “During the period that two or more required trains of the MCR/ESGR bottled air system are inoperable, appropriate compensatory measures (consistent with the intent of GDC 19) should be utilized to protect control room operators from potential hazards such as radioactive contamination. Preplanned measures should be available to address these concerns for intentional and unintentional entry into the condition.” This changes CTS by allowing only one required train of the MCR/ESGR EVS and MCR/ESGR bottled air system to be inoperable for 7 days, and allowing two or more required trains of the MCR/ESGR bottled air system to be inoperable for any reason for 24 hours instead of 7 days. This also changes CTS by requiring compensatory measures be taken while two or more trains of the MCR/ESGR bottled air system are inoperable. Not allowing both the MCR/ESGR EVS and MCR/ESGR bottled air system to be inoperable concurrently for 24 hours except for an inoperable MCR/ESGR boundary is addressed by DOC M.3.	3.7.13 Actions A and C	3.7.7.1 Actions a and b

Table M – More Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.13 M.3	CTS 3.7.7.1 Action b states, “With both the emergency ventilation system and the bottled air pressurization system inoperable, restore at least one of these systems to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.” ITS 3.7.13 Required Action B.1 requires that with two or more required MCR/ESGR bottled air system trains inoperable due to an inoperable MSR/ESGR boundary in MODE 1, 2, 3, or 4, restore the MCR/ESGR boundary to OPERABLE status within 24 hours. The Bases for Required Action B.1 state, “During the period that the MCR/ESGR boundary is inoperable, appropriate compensatory measures (consistent with the intent of GDC 19) should be utilized to protect control room operators from potential hazards such as radioactive contamination. Preplanned measures should be available to address these concerns for intentional and unintentional entry into the condition.” ITS 3.7.13 Condition D requires that if the Required Actions and associated Completion Time of Condition A, B or C are not met, the unit be in MODE 3 in 6 hours, and MODE 5 in 36 hours. This changes CTS by not providing a Completion time of 24 hours when the two or more required MCR/ESGR EVS trains and two or more required MCR/ESGR bottled air trains are inoperable at the same time, except for an inoperable MCR/ESGR boundary. This also changes CTS by requiring compensatory measures be taken while the MCR/ESGR boundary is inoperable. This results in 23 fewer hours allowed to place the unit in MODE 3 and MODE 5, and requires additional compensatory actions be taken.	3.7.13 Actions B and D	3.7.7.1 Action b
3.7.13 M.4	ITS 3.7.13 Applicability includes, “During movement of recently irradiated fuel assemblies.” ITS 3.7.13 Condition E requires movement of recently irradiated fuel assemblies be stopped immediately if, “Required Action and associated Completion Time of Condition A not met during movement of recently irradiated fuel assemblies OR Two or more required MCR/ESGR bottled air system trains inoperable during movement of recently irradiated fuel assemblies.” CTS 3.7.7.1 does not include this Applicability or these Required Actions. This changes CTS by adding a new Applicability and associated Required Actions.	3.7.13 Applicability and Action E	None
3.7.13 M.5	CTS 4.7.7.1 states, “Each control room emergency ventilation system shall be demonstrated OPERABLE:...d. At least once per 18 months by:...2. Verifying that the normal air supply and exhaust are automatically shutdown on a Safety Injection Actuation Test Signal.” ITS SR 3.7.13.3 states, “Verify each MCR/ESGR bottled air system train actuates on an actual or simulated actuation signal.” The Frequency is every 18 months. This changes CTS by requiring verification of automatic actuation of each MCR/ESGR bottled air system train on an actual or simulated actuation signal. The change moving details of how the test is performed are addressed in a removed detail discussion of change.	SR 3.7.13.3	4.7.7.1d.2

Table M – More Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.13 M.6	CTS 4.7.7.2 states, “The bottled air pressurization system shall be demonstrated OPERABLE: a. At least once per 31 days by verifying that the system contains a minimum of 84 bottles of air (shared with Unit 2) each pressurized to at least 2300 psig.” The Unit 2 CTS refer to sharing with Unit 1. ITS SR 3.7.13.2 states, “Verify each MCR/ESGR bottled air bank manual valve not locked, sealed, or otherwise secured and required to be open during accident conditions is open,” every 31 days. This changes CTS by specifying the valve positions for the MCR/ESGR bottled air system must be verified as described. Moving the reference to the other unit and the number of required bottles is addressed by DOC LA.3.	3.7.13.2	4.7.7.2
3.7.13 M.7	CTS 4.7.7.2.b specify positive pressure and flow requirements that must be met by the control room bottled air pressurization system. ITS SR 3.7.13.4 states the positive pressure and flow requirements that must be met by two required trains of the MCR/ESGR bottled air system. This changes the CTS by specifying that the two required trains must be capable of performing the specified Surveillance Requirement.	SR 3.7.13.4	4.7.7.2.b
3.7.13 M.8	CTS 4.7.7.2.b uses a reference of “outside atmosphere” with regard to the pressure at which the bottled air system must maintain the control room. ITS SR 3.7.13.4 uses the reference “adjacent areas.” This changes the reference used when determining whether the MCR/ESGR envelope has been sufficiently pressurized to a more specific reference.	SR 3.7.13.4	4.7.7.2.b
3.7.14 M.1	ITS 3.7.14 specifies requirements for the MCR/ESGR Emergency Ventilation System (EVS) during movement of recently irradiated fuel assemblies. CTS 3.7.7.1 does not include requirements for the MCR/ESGR EVS during movement of recently irradiated fuel assemblies. This changes CTS by adding requirements for the MCR/ESGR EVS during movement of recently irradiated fuel assemblies.	3.7.14	None
3.7.15 None	N/A	N/A	N/A
3.7.16 None	N/A	N/A	N/A
3.7.17 None	N/A ?	N/A	N/A
3.7.18 None	N/A ?	N/A	N/A

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.7.1 LA.1	3.7.1.1 Table 3.7-2	CTS 3.7.1.1, Table 3.7-2, is modified by a footnote that states, "The lift setting pressure shall correspond to ambient conditions of the valve at nominal operating temperature and pressure. ITS 3.7.1 does not contain this information. This changes the CTS by eliminating details on setting the lift pressure.	IST	ITS 5.5.7, Inservice Testing Program	3
3.7.2 None	N/A	N/A	N/A	N/A	N/A
3.7.3 None	N/A	N/A	N/A	N/A	N/A
3.7.4 None	N/A	N/A	N/A	N/A	N/A
3.7.5 LA.1	3.7.1.2	CTS LCO 3.7.1.2 requires three independent AFW pumps and associated flow paths to be OPERABLE. This includes the motor driven AFW pumps powered from separate emergency buses, and the steam turbine driven AFW pump capable of being powered from an OPERABLE steam supply system. ITS LCO 3.7.5 will require "Three AFW trains to be OPERABLE"; it does not include design details or define the components that comprise an OPERABLE AFW train. This changes the CTS by removing description of the AFW system from the Technical Specifications (TS).	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.7.5 LA.2	4.7.1.2.c	CTS SR 4.7.1.2.c requires the testing of the automatic valves in the AFW flow path and the starting of the AFW pumps during shutdown. ITS SRs 3.7.5.3 and 3.7.5.4 require the testing for the pumps and a valve to ensure OPERABILITY is maintained. This change moves the requirement to perform the testing "during shutdown" from the Technical Specifications (TS).	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements or Reporting Requirements
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.7.6 LA.1	3.7.1.3	CTS ACTION b states the Condensate Storage Tank (CST) acts as a backup supply to the AFW pumps with a capacity of 300,000 gallons. ITS 3.7.6 requires the CST to be OPERABLE when the Emergency Condensate Storage Tank (ECST) is inoperable. This changes the CTS by deletion of specific tank capacity and restates the functional requirements.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.7.7 None	N/A	N/A	N/A	N/A	N/A
3.7.8 LA.1	3.7.4.1	CTS 3.7.4.1 states that two service water loops shall be OPERABLE and contains a description of what constitutes an OPERABLE loop. ITS 3.7.8 requires two service water (SW) System loops to be OPERABLE, but does not contain these details. This changes the CTS by moving the detail of what constitutes OPERABLE SW System loops to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.7.8 LA.2	4.7.4.1.b	CTS Surveillance 4.7.4.1.b requires the measurement of any movement of the SW pumphouse and wing walls every 6 months. CTS 4.7.4.1.b gathers information used in evaluating compliance with CTS 3.7.12, "Settlement of Class 1 Structures." ITS 3.7.8 does not contain this requirement. This changes the CTS by moving the procedural detail of measuring SW pumphouse and wing wall movement to the Technical Requirements Manual (TRM).	Technical Requirements Manual	10 CFR 50.59	3
3.7.8 LA.3	4.7.4.1.c	CTS 4.7.4.1.c requires verification of the automatic actuation of SW System valves every 18 months during shutdown. ITS SR 3.7.8.2 requires verification of the automatic actuation of SW System valves every 18 months, but not the requirement that this testing be performed during shutdown. This changes the CTS by moving the reference to performing the SR when the plant is shutdown to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements or Reporting Requirements
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.7.8 LA.4	4.7.4.1.c.1	CTS 4.7.4.1.c.1 requires verification that each automatic valve actuates to its correct position on an actual or simulated safety injection signal. CTS 4.7.4.1.c.2 requires verification that each automatic valve actuates to its correct position on an actual or simulated containment high-high signal. ITS SR 3.7.8.2 requires verification that each automatic valve actuates to its correct position on an actual or simulated actuation signal. This changes the CTS by moving the name of the actuation signals to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.7.8 LA.5	3.7.4.1 Action d	CTS 3.7.4.1 Action d contains a reference to a footnote which describes those activities that are considered service water system upgrades. ITS 3.7.8 does not contain the information in the footnote. This changes the CTS by moving the description of what constitutes service water system upgrades to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.7.8 LA.6	4.7.4.1.c.1	CTS 4.7.4.1.c.1 requires that each valve servicing safety related equipment actuate to its correct position on an actual or simulated signal. ITS SR 3.7.8.2 does not reference the servicing of safety related equipment. This changes CTS by moving the reference to safety related equipment to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.7.8 LA.7	4.7.4.1.d	CTS 4.7.4.1.d requires each SW pump to be tested in accordance with Specification 4.0.5. ITS 5.5.8, "Inservice Testing Program," provides controls for inservice testing of ASME Code Class 1, 2, and 3 components. ITS 3.7.8 does not contain the specific Surveillance to test each SW pump in accordance with the Inservice Testing Program. This changes the CTS by removing a detailed listing of the components required to be tested in accordance with the Inservice Testing Program.	IST	ITS 5.5.7, Inservice Testing Program	3

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements or Reporting Requirements
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems

DOC No.		CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.7.9	LA.1	4.7.5.2	CTS 4.7.5.2 states data for calculating the leakage from the Service Water Reservoir shall be obtained and recorded at least once per 6 months. ITS 3.7.9 does not contain this requirement. This changes the CTS by moving the requirement to the Technical Requirements Manual (TRM).	Technical Requirements Manual	10 CFR 50.59	3
3.7.9	LA.2	3.7.5.1	CTS 3.7.5.1 requires that minimum water level for the ultimate heat sinks be measured to USGS datum, and average water temperature of the Service Water Reservoir be measured at the SW pump outlet. ITS SR 3.7.9.1 and SR 3.7.9.2 require verification of the parameters. This changes the CTS by not specifying the datum for mean sea level, or where the average Service Water Reservoir water temperature is measured.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.7.10	LA.1	4.7.7.1.a	CTS 4.7.7.1 states, “Each control room emergency ventilation system shall be demonstrated OPERABLE: a. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 10 hours with the heaters on.” ITS SR 3.7.10.1 states, “Operate each required MCR/ESGR EVS train for ≥ 10 continuous hours with the heaters operating.” The Frequency is every 31 days. This changes the CTS by moving the detail of how the surveillance is conducted to the Bases. The change deleting the STAGGERED TEST BASIS reference is addressed in DOC L.1.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements or Reporting Requirements
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.7.10 LA.2	4.7.7.1.d	CTS 4.7.7.1 states, “Each control room emergency ventilation system shall be demonstrated OPERABLE:...d. At least once per 18 months by:...2. Verifying that the normal air supply and exhaust are automatically shutdown on a Safety Injection Actuation Test Signal.” ITS SR 3.7.10.3 states, “Verify each LCO 3.7.10.a MCR/ESGR EVS train actuates on an actual or simulated actuation signal.” The Frequency is every 18 months. This changes the CTS by moving the detail of what is verified by the Surveillance to the Bases. The change adding the, “actual or simulated actuation,” phrase is addressed DOC L.2.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.7.11 None	N/A	N/A	N/A	N/A	N/A
3.7.12 LA.1	3.7.8.1	The Unit 1 CTS 3.7.8.1 states, “Two safeguards area ventilation systems (SAVS) shall be OPERABLE with: a. one SAVS exhaust fan b. one auxiliary building HEPA filter and charcoal adsorber assembly (shared with Unit 2).” In the Unit 2 CTS, the reference to the other unit states, “(shared with Unit 1).” ITS 3.7.12 states, “Two ECCS PREACS trains shall be OPERABLE.” This changes the CTS by moving the details of what the subsystems consist of and the fact that the two units share portions of the system to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements or Reporting Requirements
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.7.12 LA.2	4.7.8.1.a.1	CTS 4.7.8.1.a.1 states that each SAVS system shall be demonstrated OPERABLE by, “Initiating, from the control room, flow through the auxiliary building HEPA filter and charcoal adsorber assembly and verifying that the SAVS operates for at least 10 hours with the heater on.” ITS 3.7.12.2 states, “Actuate each ECCS PREACS train by aligning Safeguards Area exhaust flow and Auxiliary Building Central exhaust system flow through the Auxiliary Building HEPA filter and charcoal adsorber assembly.” This changes the CTS by moving the fact that the system is actuated from the control room to the Bases. The changes associated with adding Auxiliary Building Central exhaust system components and flow are addressed by DOC M.1	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.7.12 LA.3	4.7.8.1.d.2	CTS 4.7.8.1.d.2 requires that part of demonstrating SAVS OPERABILITY is, “Verifying that on a Containment Hi-Hi Test Signal, the system automatically diverts Safeguards Area exhaust flow through the Auxiliary Building HEPA filter and charcoal adsorber assembly.” ITS SR 3.7.12.4 states, “Verify Safeguards Area exhaust flow is diverted and each Auxiliary Building filter bank is actuated on an actual or simulated actuation signal.” This changes the CTS by moving the detail regarding the specific signal used and flow paths to the Bases. The change adding the option of using an actual signal is addressed in DOC L.2.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.7.13 LA.1	3.7.7.1	Unit 2 CTS 3.7.7.1 states, “The following control room emergency habitability systems shall be OPERABLE:... b. The bottled air pressurization system*...” CTS 3.7.7.1 “*” states, “Shared with Unit 1.” ITS 3.7.13 requires two MCR/ESGR bottled air system trains to be OPERABLE. This changes the CTS by moving the fact that the two units share the bottled air system to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements or Reporting Requirements
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.7.13 LA.2	4.7.7.1	CTS 4.7.7.1 states, “Each control room emergency ventilation system shall be demonstrated OPERABLE:....d. At least once per 18 months by:...2. Verifying that the normal air supply and exhaust are automatically shutdown on a Safety Injection Actuation Test Signal.” ITS SR 3.7.13.3 states, “Verify each MCR/ESGR bottled air system train actuates on an actual or simulated actuation signal.” The Frequency is every 18 months. This changes the CTS by moving the detail of what is verified by the Surveillance to the Bases. The change adding the, “actual or simulated actuation,” phrase is addressed DOC L.2.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.7.13 LA.3	4.7.7.2	The Unit 1 CTS 4.7.7.2 states, “The bottled air pressurization system shall be demonstrated OPERABLE: a. At least once per 31 days by verifying that the system contains a minimum of 102 bottles of air (shared with unit 2) each pressurized to at least 2300 psig.” In the Unit 2 CTS, the reference to the other unit states, “shared with unit 1.” ITS SR 3.7.13.3 states, “Verify each required MCR/ESGR bottled air bank is pressurized to ≥ 2300 psig.” ITS SR 3.7.13.4 states, “Verify each MCR/ESGR bottled air bank manual valve not locked, sealed, or otherwise secured and required to be open during accident conditions is open.” The Frequency is every 31 days. This changes the CTS by moving the detail that the bottles are shared with the other unit and the number of bottles required to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.7.14 None	N/A	N/A	N/A	N/A	N/A
3.7.15 None	N/A	N/A	N/A	N/A	N/A
3.7.16 None	N/A	N/A	N/A	N/A	N/A
3.7.17 None	N/A	N/A	N/A	N/A	N/A

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements or Reporting Requirements
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.7.18 None	N/A	N/A	N/A	N/A	N/A
CTS 3.7.1.6 R.1	3.7.1.6	CTS 3.7.1.6 states that the structural integrity of the steam turbine assembly shall be maintained in MODES 1 and 2. The steam turbine assembly is used to provide the motive force for the main electrical generator. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R
CTS 3.7.1.7 R.1	3.7.1.7	CTS 3.7.1.7 states that at least one turbine overspeed protection system shall be OPERABLE in MODES 1, 2, and 3. The turbine overspeed protection system is used to prevent a turbine overspeed condition that could result in turbine damage. The turbine overspeed protection system serves no accident mitigation function in any MODE. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R
CTS 3.7.2.1 R.1	3.7.2.1	CTS 3.7.2.1 states that the temperature of both the primary and secondary coolants in the steam generators shall be greater than 70° when the pressure of either coolant in the steam generator is greater than 200 psig at all times. The Steam Generator Pressure/Temperature Limitation serves no accident mitigation function in any MODE. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements or Reporting Requirements
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
CTS 3.7.3.1 R.1	3.7.3.1	CTS 3.7.3.1 states that three component cooling (CC) water system loops shall be OPERABLE. It is applicable when either unit is in MODES 1, 2, 3, or 4. The primary function of the CC System is to provide cooling water to the Residual Heat Removal (RHR) heat exchangers. Unlike other Westinghouse plants, the RHR at North Anna Power Station (NAPS) does not share components with the Emergency Core Cooling System (ECCS), and thus does not play a role in DBA mitigation. At NAPS, this post-accident heat removal function is provided primarily by the Recirculation Spray System and the Low Head Safety Injection pumps. For this reason, CC is not required for DBA mitigation, and, like RHR, does not meet Criterion 3 of 10 CFR 50.36(c)(2)(ii) for retention in the Technical Specifications for MODES 1, 2, 3, and 4. Other plants use CC for DBA mitigation functions other than ECCS, such as containment cooling, but the CC system at NAPS does not. This makes the CC System at NAPS different from the CC System described in the ISTS, and retaining the CC requirement for supporting RHR or any other components not assumed in DBA analysis is inappropriate. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements or Reporting Requirements
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
CTS 3.7.3.2 R.1	3.7.3.2	CTS 3.7.3.2 states that two component cooling water system (CC) loops shall be OPERABLE. It is applicable when both units are in MODES 5 or 6. The primary function of the CC System is to provide cooling water to the Residual Heat Removal (RHR) heat exchangers, but does not warrant its own LCO. If insufficient CC is available for RHR, RHR is declared inoperable and the Conditions and Actions for CC in CTS are the same as those for RHR. Unlike other Westinghouse plants, RHR does not share components with the Emergency Core Cooling System (ECCS), and thus does not play a role in DBA mitigation in MODES 1, 2, 3, and 4. Other plants use CC for DBA mitigation functions other than ECCS in MODES 1, 2, 3, and 4, but the CC system at NAPS does not. This makes the CC System at NAPS different from the CC System described in the ISTS, and retaining the CC requirement for MODES 5 and 6 for supporting RHR or any other components not assumed in DBA analysis is inappropriate. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements or Reporting Requirements
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
CTS 3.7.4.2 R.1	3.7.4.2	CTS 3.7.4.2 states that one service water loop shall be OPERABLE when both units are in MODES 5 or 6. The Service Water (SW) System in MODES 5 or 6 is used to provide cooling water to various safety and nonsafety related systems. Its principal safety function is to cool the Recirculation Spray (RS) heat exchangers which are not required to be OPERABLE in MODES 5 or 6. It also provides cooling water to the Component Cooling Water system (which supports no accident loads), the main control room coolers, instrument air compressors, and charging pump gearbox coolers. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements or Reporting Requirements
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
CTS 3.7.5.1.b R.1	3.7.5.1.b	CTS 3.7.5.1.b states that one of the ultimate heat sinks that shall be OPERABLE is the North Anna Reservoir with a minimum water level at or above elevation 244 Mean Sea Level, USCG Datum, and average water temperature of $\leq 95^{\circ}$ as measured at the condenser inlet. The North Anna Reservoir provides makeup to the Service Water Reservoir for 30 days after a Design Basis Accident (DBA) as necessary to maintain cooling water inventory, ensuring a continued cooling capability. The Service Water Reservoir is credited as the ultimate heat sink for the DBA. The Service Water Reservoir contains adequate water to provide at least 30 days of cooling to support simultaneous safe shutdown and cooldown of both units and their maintenance in a safe-shutdown condition. The Service Water Reservoir also provides sufficient cooling for at least 30 days in the event of an accident in one unit, to permit control of that accident and permit simultaneous safe shutdown and cooldown of the remaining unit and maintain them in a safe-shutdown condition. The North Anna Reservoir serves as a backup to the Service Water Reservoir. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R
CTS 3.7.6.1 R.1	3.7.6.1	CTS 3.7.6.1 states the maximum elevation of the North Anna Reservoir. If this limit is exceeded, flood control measures are required to protect safety related equipment. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R

- Change Category:
- 1 - Removing Details of System Design and System Description, Including Design Limits
 - 2 - Removing Descriptions of System Operation
 - 3 - Removing Procedural Details for Meeting TS Requirements or Reporting Requirements
 - 4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
 - 5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
CTS 3.7.10 R.1	3.7.10	CTS 3.7.10 states that snubbers shall be OPERABLE. The OPERABILITY of snubbers ensures that the Reactor Coolant System and other safety related fluid systems are adequately restrained and supported during an earthquake and are free to expand and contract during normal operation as the system temperature changes. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R
CTS 3.7.11.1 R.1	3.7.11.1	CTS 3.7.11.1 states each sealed source containing radioactive material either in excess of 100 microcuries of beta and/or gamma emitting materials or 5 microcuries of alpha emitting material, shall be free of greater than or equal to 0.005 microcuries of removable contamination. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R
CTS 3.7.12.1 R.1	3.7.12.1 and Table 3.7-5	CTS 3.7.12.1 and Table 3.7-5 provide limits on the total and differential settlement of Class 1 structures. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R

- Change Category:
- 1 - Removing Details of System Design and System Description, Including Design Limits
 - 2 - Removing Descriptions of System Operation
 - 3 - Removing Procedural Details for Meeting TS Requirements or Reporting Requirements
 - 4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
 - 5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
CTS 3.7.13 R.1	3.7.13	CTS 3.7.13 requires periodic measurement of the groundwater level at locations around the Service Water Reservoir. The groundwater level of the Service Water Reservoir is used to monitor long-term performance of the Service Water Reservoir dike. Failure to meet the requirements of the LCO does not result in the inoperability of the Service Water System. The ACTIONS direct that evaluations be performed to determine cause and consequences of the high groundwater level. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements or Reporting Requirements
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table A – Administrative Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.8.1 A.2	CTS LCO 3.7.4.1, Service Water System – Operating, states, “Two service water loops (shared with the other unit) shall be OPERABLE with each loop consisting of two OPERABLE service water pumps (excluding auxiliary service water pumps) with their associated normal and emergency power supplies, and an OPERABLE flow path.” Each unit’s service water system requirements consist of the above requirements for either unit operating in MODES 1, 2, 3, or 4. ITS LCO 3.7.10 specifies the requirements for the Main Control Room (MCR) / Emergency Switchgear Room (ESGR) Habitability System. This system requires the MCR and ESGR fans on both units to be OPERABLE in MODES 1, 2, 3, and 4 and during the movement of recently irradiated fuel assemblies. ITS LCO 3.7.12 requires the fans from the Auxiliary Building central exhaust system to be OPERABLE to support the Emergency Core Cooling System (ECCS) Pump Room Exhaust Air Cleanup System. This could require a fan powered from the other unit to be required for this unit. The SW pumps and the fans from the MCR/ESGR and Auxiliary Building exhaust ventilation systems are components that may be required by either or both units. Therefore, these pumps and fans are classified as “shared components,” for the electrical power requirements. ITS LCO 3.8.1 Action J states, “Two required LCO 3.8.1.c EDGs inoperable, declare shared components inoperable immediately.” The net requirements remain the same.	3.8.1, Required Action J	CTS LCO 3.7.4.1
3.8.1 A.3	CTS 3.8.1.1 Actions b.1 and b.2 provide an allowance to have an EDG inoperable for up to 14 days. These Actions require the OPERABILITY of the alternate AC (AAC) diesel generator (DG) and the opposite unit’s EDGs at the time of the initial inoperability of the EDG and throughout the 14 day allowed outage time. If either the AAC DG or either of the opposite unit’s EDGs become inoperable when relied on for this action, a seventy two-hour limit is imposed for the EDG. If the AAC DG and both of the opposite unit’s EDGs are returned to an OPERABLE status within the 72-hour limit, the EDG may continue in the 14 day allowed outage. ITS Action B provides the necessary Required Actions for returning the inoperable EDG to OPERABLE status within 14 days. ITS Action C requires with an EDG inoperable and one or more of the opposite unit's EDGs or the AAC DG inoperable, both of the opposite unit’s EDGs and the AAC DG must be restored to OPERABLE status within 72 hours or restore the ITS 3.8.1.b EDG to OPERABLE status. A Note to ITS Condition C states that the condition is only applicable if either the AAC DG or the opposite unit EDG(s) is inoperable. The net requirements remain the same.	3.8.1, ACTION B and C	3.8.1.1, Actions b.1 and b.2

Table A – Administrative Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.		Description of Change	ITS Requirement	CTS Requirement
3.8.1	A.4	CTS 3.8.1.1 Action c applies, “With one offsite circuit and one EDG inoperable.” In this condition an emergency bus may be de-energized. CTS LCO 3.8.2.1 provides an Action for an emergency bus that is de-energized. A Note to ITS 3.8.1 Action H in the Required Actions column states, “Enter applicable Conditions and Required Actions of LCO 3.8.9, “Distribution System - Operating,” when Condition H is entered with no AC power source to any train.” The addition of the Note does not alter the technical requirements of the CTS and acts as only a reminder to enter appropriate Actions. The net requirements remain the same.	3.8.1 Action H Note	3.8.1.1, Action c, LCO 3.8.2.1
3.8.1	A.5	CTS 3.8.1.1 Action c for an inoperable offsite circuit and EDG requires the restoration of one of the sources within 12 hours and states “demonstrate the OPERABILITY of the remaining offsite A.C. power sources by performing Surveillance Requirement 4.8.1.1.1.a within one hour and at least once per 8 hours thereafter.” That is, when the EDG is declared inoperable and Action b is entered and either earlier or later an offsite circuit is declared inoperable, Action a. and Action c. are also required to be entered. The only mechanism for entering Action c is to be in Action a and Action b concurrently. ITS 3.8.1 Action H states that when one offsite circuit and one EDG are inoperable, one source must be returned to OPERABLE status within twelve hours. The only mechanism to enter this Condition is to have entered ITS 3.8.1 Actions A and B concurrently. ITS Required Action B.1 states that SR 3.8.1.1 will be performed for offsite circuit(s). It also requires in Required Action B.3, an evaluation of the OPERABLE EDG is made. With the requirements of the CTS stated in this manner, CTS 3.8.1.1 Action c repeated the requirements of Action b, for the performance of CTS requirement 4.8.1.1.1.a and the evaluation of the OPERABLE EDG. This requirement is redundant and therefore is eliminated in ITS.	3.8.1, Action H	3.8.1.1, Action c

Table A – Administrative Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 A.6	<p>CTS 3.8.1.1, Action d, applies when two offsite circuits are inoperable and requires one offsite circuit be restored to OPERABLE status within twenty-four hours, or be in at least HOT STANDBY within the next 6 hours. The requirement also states, “Following restoration of one offsite source, follow Action Statement a with the time requirement of that Action Statement based on the time of initial loss of the remaining inoperable offsite A.C. circuit.” CTS Action a states, “Restore the offsite circuit to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next six hours and COLD SHUTDOWN within the following 30 hours.” If both inoperable offsite circuits are not restored when the unit reaches HOT STANDBY, the required actions do not specify any further actions. With the unit in HOT STANDBY and no offsite circuits, LCO 3.0.3 must be entered. This requires the unit to be placed in HOT SHUTDOWN in 6 hours and COLD SHUTDOWN within the next 24 hours. ITS Actions A and G are constructed to track the inoperability of one and two offsite circuits. ITS Action A requires an inoperable offsite circuit be restored to OPERABLE status within 72 hours. ITS Action G must be entered when two circuits are concurrently inoperable and allows 24 hours to restore one offsite circuit to OPERABLE status. If ITS Actions A or G are not met within either allowed Completion Times, ITS Action K must be entered and requires the unit to be place in MODE 3 within 6 hours and MODE 5 within 36 hours. This changes maintains the technical requirements of the CTS requirements in the ITS format.</p>	3.8.1, ACTIONS A and G	3.8.1.1, Actions a and d
3.8.1 A.7	<p>CTS 3.8.1.1 Action e applies when two EDGs are inoperable and requires one EDG to be restored to OPERABLE status within two hours. This requirement also states, “demonstrate the OPERABILITY of two offsite A.C. circuits by performing Surveillance Requirement 4.8.1.1.1.a within one hour and at least once per 8 hours thereafter.” In addition the CTS requires, “Following restoration of one EDG, follow Action Statement b. with the time requirement of that Action Statement based on the time of initial loss of the remaining inoperable EDG.” ITS Actions B and I are constructed to track the inoperability of one and two EDGs. ITS Action B requires that each inoperable EDG be tracked and ITS Action I applies when both EDGs are inoperable. Therefore, ITS Action B must be entered if one or two EDGs are inoperable and requires the performance of SR 3.8.1.1 within one hour and every eight hours thereafter. This maintains the CTS requirement to demonstrate the OPERABILITY of two offsite AC circuits within an hour and every 8 hours thereafter when one or two EDGs are inoperable.</p>	3.8.1, ACTIONS B and I	3.8.1.1, Actions b and e
3.8.1 A.8	<p>CTS LCO 3.8.1.1 does not contain an Action for more than two sources of either offsite circuits or EDGs inoperable. Having more than two sources inoperable requires entering CTS LCO 3.0.3. ITS 3.8.1, Action M, requires entering LCO 3.0.3 immediately if three or more AC sources are inoperable. The net requirements remain the same.</p>	3.8.1, ACTION M	LCO 3.8.1.1

Table A – Administrative Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 A.9	<p>CTS LCO 3.7.4.1, Service Water System – Operating, states, “Two service water loops (shared with the other unit) shall be OPERABLE with each loop consisting of two OPERABLE service water pumps (excluding auxiliary service water pumps) with their associated normal and emergency power supplies, and an OPERABLE flow path.” Each unit’s service water system specification applies when either unit is operating in MODES 1, 2, 3, or 4. ITS LCO 3.7.10 specifies the requirements for the Main Control Room (MCR) / Emergency Switchgear Room (ESGR) Habitability System. This system requires the MCR and ESGR fans on both units to be OPERABLE in MODES 1, 2, 3, and 4 and during the movement of recently irradiated fuel assemblies. ITS LCO 3.7.12 requires the fans from the Auxiliary Building central exhaust system to be OPERABLE to support the Emergency Core Cooling System (ECCS) Pump Room Exhaust Air Cleanup System. This could require a fan powered from the other unit to be required for this unit. The SW pumps and the fans from the ventilation systems are components that may be required by either or both units. Therefore, these pumps and fans are classified as “shared components,” for the electrical power requirements. ITS LCO 3.8.1, “AC Sources,” part c states, “One qualified circuit between the offsite transmission network and the onsite Class 1E AC Electrical Power Distribution System and one EDG capable of supplying the onsite Class 1E AC power distribution subsystem on the other unit for each required shared component; and.” This change maintains the CTS requirements for AC sources in the ITS format.</p>	LCO 3.7.10, LCO 3.7.12, LCO 3.8.1.c	LCO 3.7.4.1
3.8.1 A.10	<p>CTS SR 4.8.1.1.2.a.4 states “Verifying the EDG can start ** and voltage and frequency at 4160 ± 420 volts and 60 ± 0.5 Hz.” The note ** states, “This test shall be conducted in accordance with the manufacturer’s recommendations regarding engine prelube and warmup procedures, and as applicable regarding loading recommendations.” ITS SR 3.8.1.2 states, “Verify each EDG starts from standby conditions and achieves steady state voltage of ≥ 3740 V to ≤ 4580 V, and the frequency from ≥ 59.5 Hz to ≤ 60.5 Hz.” Two Notes modify SR 3.8.1.2. Note 1 states, “All EDG starts may be preceded by an engine prelube period and followed by a warm up period prior to loading.” Note 2 states, “A modified EDG start involving idling and gradual acceleration to synchronous speed may be used for this SR as recommended by the manufacturer. When a modified start procedures are not used, the time, voltage, and frequency tolerances of SR 3.8.1.7 must be met.” The CTS requirements and allowances is retained in the ITS format.</p>	SR 3.8.1.2	4.8.1.1.2.a.4

Table A – Administrative Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 A.11	CTS SR 4.8.1.1.2.a.4 states after a successful start of the EDG, “Subsequently, verifying the generator is synchronized, gradually loaded ** to an indicated 2500 - 2600 kW *** and operates for at least 60 minutes.” CTS notes ** and *** allow the test to be conducted in accordance with manufacturer’s recommendations regarding engine warmup and loading. These notes also allow momentary variations in loads, due to changing in bus loads, to not invalidate the test. ITS SR 3.8.1.3 states, “Verify each EDG is synchronized and loaded and operates for ≥ 60 minutes at a load ≥ 2500 kW and ≤ 2600 kW.” Four Notes modify the SR. Notes 1 and 2 allow EDG loading as recommended by the manufacturer and momentary transients outside the load range to not invalidate the test. Notes 3 and 4 are addressed by DOC M.6. The net requirements remain the same.	SR 3.8.1.3	4.8.1.1.2.a.4
3.8.1 A.12	Not used.	N/A	N/A
3.8.1 A.13	CTS requirement 4.8.1.1.2.c states that the EDG shall be started at least once per 184 days and manually synchronized to its appropriate emergency bus, gradually loaded** to an indicated 2500 to 2600 kW***, and operated for at least 60 minutes. ITS SR 3.8.1.7 requires the start of the EDG every 184 days. ITS SRs 3.8.1.3 requires the synchronization and loading of the EDG from 2500 to 2600 kW for a period of 60 minutes. SR 3.8.1.3 contains a Note, which states that the requirement shall be preceded by and immediately follows without shutdown a successful performance of SR 3.8.1.2 or SR 3.8.1.7. This changes the CTS by eliminating the duplicated requirements of 4.8.1.1.2.c (ITS SR 3.8.1.7), which are now contained in ITS SR 3.8.1.3 (CTS SR 4.8.1.1.2.a.4). The net requirements remain the same.	SR 3.8.1.7, SR 3.8.1.3 Note	4.8.1.1.2.c
3.8.1 A.14	CTS requirements 4.8.1.1.2.d.2, d.3, d.5, and d.8 require the testing of the EDGs, at least once per 18 months “during shutdown.” ITS SRs 3.8.1.10, 3.8.1.15, 3.8.1.16 and 3.8.1.17 incorporate this requirement and state it as a Note. The Note states, “This Surveillance shall not be performed in MODES 1, 2, 3, or 4.” This changes the CTS by specifically stating the applicable MODES of operation that the SRs may be performed. The overall requirements remain the same.	SR 3.8.1.10, SR 3.8.1.15, SR 3.8.1.16 and SR3.8.1.17	4.8.1.1.2.d.2, d.3, d.5, and d.8
3.8.1 A.15	CTS SR 4.8.1.1.2.a.6 states, in part, that the EDG shall be operated to an indicated load of 2500 - 2600 kW and is modified by a footnote labeled ***. CTS note *** allows momentary variations in loads, due to changing in bus loads, to not invalidate the test. ITS SR 3.8.1.13 states in Note 1, “Momentary transients outside the load range to not invalidate the test.” The overall requirements remain the same.	SR 3.8.1.13 Note 1	4.8.1.1.2.a.6

Table A – Administrative Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 A.16	CTS SR 4.8.1.1.2.a.10 states, in part, that the EDG shall be operated to an indicated load of 2500 - 2600 kW *** for 2 hours, or until operating temperatures have stabilized, then the EDG must be shutdown. Within 5 minutes of shutting down, verify the EDG can start and achieve the required voltage and frequency within 10 seconds. The CTS footnote *** allows momentary variations in loads, due to changes in bus loads to not invalidate the test. ITS SR 3.8.1.14 states in Note 1, “This Surveillance shall be performed within 5 minutes of shutting down the EDG after the EDG has operated ≥ 2 hours loaded ≥ 2500 kW and ≤ 2600 kW or after operating temperatures have stabilized.” The Note 1 also allows, “Momentary transients outside the load range to not invalidate the test.” The overall requirements remain the same.	SR 3.8.1.14, Note 1	4.8.1.1.2.a.10, footnote ***
3.8.1 A.17	Unit 1 CTS Surveillance Requirement 4.8.1.1.1.b states that the independent circuits between the offsite transmission network and the onsite Class 1E distribution system shall be demonstrated OPERABLE at least once per 18 months during shutdown by manually transferring the onsite Class 1E power supply from the normal circuit to the alternate circuit. This SR for unit 2 has been eliminated by DOC L.7. ITS SR 3.8.1.8 states, “Verify manual transfer of AC power sources from the normal offsite circuit to the alternate required offsite circuit. The SR is modified by a Note that states, “This Surveillance is only applicable to Unit 1.” This changes the CTS by specifically stating that the SR is only to Unit 1, and the SR is not required for Unit 2 as discussed in DOC L7 and thus is an administrative change in nature.	SR 3.8.1.8, Note	Unit 1 4.8.1.1.1.b
3.8.1 A.18	CTS Surveillance Requirement 4.8.1.1.2.d.5.c requires the verification that all EDG trips, except engine overspeed, generator differential and breaker overcurrent are automatically bypassed on an emergency start. The output breaker overcurrent for the EDG is not a trip for the diesel and should not be included in the exception. ITS SR 3.8.1.12 requires the verification of each EDG’s automatic trips are bypassed on an actual or simulated automatic start signal except for engine overspeed and generator differential current. The EDG output breaker overcurrent is not part of EDG trips and thus will not be included in ITS. The overall requirements remain the same.	SR 3.8.1.12	4.8.1.1.2.d.5.c

Table A – Administrative Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 A.19	CTS LCO 3.7.4.1, Service Water System – Operating, states, “Two service water loops (shared with the other unit) shall be OPERABLE with each loop consisting of two OPERABLE service water pumps (excluding auxiliary service water pumps) with their associated normal and emergency power supplies, and an OPERABLE flow path.” Each unit’s service water system specification applies when either unit is operating in MODES 1, 2, 3, or 4. ITS LCO 3.7.10 specifies the requirements for the Main Control Room (MCR) / Emergency Switchgear Room (ESGR) Habitability System. This system requires the MCR and ESGR fans on both units to be OPERABLE in MODES 1, 2, 3, and 4 and during the movement of recently irradiated fuel assemblies. ITS LCO 3.7.12 requires the fans from the Auxiliary Building central exhaust system to be OPERABLE to support the Emergency Core Cooling System (ECCS) Pump Room Exhaust Air Cleanup System. This could require a fan powered from the other unit to be required for this unit. The SW pumps and the fans from the ventilation systems are components that may be required by either or both units. Therefore, these pumps and fans are classified as “shared components,” for the electrical power requirements. ITS 3.8.1Action F states if the required offsite circuit and EDG on the other unit that support a required shared components become inoperable, the supported shared components will be declared inoperable immediately. The differences between the requirements for the shared systems of the CTS and the ITS are addressed in ITS LCOs 3.7.8, 3.7.10, and 3.7.12. This change maintains the CTS requirements in the ITS format.	LCO 3.7.10, LCO 3.7.12 3.8.1, Action F	LCO 3.7.4.1
3.8.1 A.20	CTS SR 4.8.1.1.2.d.5.c states that all non-critical EDG trips will be bypassed on a loss of voltage on the emergency bus and/or a safety injection actuation signal. The non-critical trips do not include engine overspeed, generator differential, and EDG output breaker overcurrent. The output breaker overcurrent is addressed in DOC A.18. ITS 3.8.1.12 states, “Verify each EDG’s automatic trip are bypassed on actual or simulated automatic start signal except engine overspeed and generator differential current. The specific automatic start signal is moved to the ITS Bases by DOC LA.1, and the overall requirements remain the same.	SR 3.8.1.12	4.8.1.1.2.d.5.c
3.8.1 A.21	Not used.	N/A	N/A
3.8.1 A.22	CTS LCO 3.8.1.1 requires two EDGs to be OPERABLE. ITS LCO 3.8.1 states two EDGs capable of supplying the onsite Class 1E power distribution subsystem(s) shall be OPERABLE. The requirement that the EDG must be capable of supplying the onsite Class 1E power distribution subsystem remains the same.	LCO 3.8.1	LCO 3.8.1.1

Table A – Administrative Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.2 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.8.2 A.2	CTS LCO 3.8.1.2 Action a. states with required AC sources inoperable immediately suspend operations involving CORE ALTERATIONS, positive reactivity additions, movement of irradiated fuel assemblies, and movement of loads over irradiated fuel assemblies until the required AC sources are restored to OPERABLE status. ITS 3.8.2 Action B adds a Note to these requirements that states, "Enter applicable Conditions and Required Actions of LCO 3.8.10, with one required train de-energized as a result of Condition B." The overall requirements remain the same.	3.8.2, ACTION B Note	3.8.1.2, Action a
3.8.3 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.8.3 A.2	CTS LCOs 3.8.1.1 and 3.8.1.2 state the requirements for the electrical power sources - operating and shutdown. These requirements are used to form the LCO and Applicability for the diesel fuel oil and starting air systems. ITS LCO 3.8.3, "Diesel Fuel Oil and Starting Air," states "The stored diesel fuel oil and starting air subsystems shall be within limits for each required emergency diesel generator (EDG)." The Applicability for these requirements are, "When associated EDG is required to be OPERABLE. The addition of the starting air requirements is addressed in DOC M.1. This changes the CTS by stating the LCO and Applicability requirements for the diesel fuel oil in the ITS format	LCO 3.8.3, 3.8.3 Applicability	LCO 3.8.1.1, LCO 3.8.1.2
3.8.3 A.3	CTS LCO 3.8.1.1 states the requirements for the diesel fuel oil in the LCO, Action, and Surveillance Requirements for the EDGs when the unit is operating. CTS LCO 3.8.1.2 lists the requirements for diesel fuel oil in the LCO, Action, and Surveillance Requirements when the unit is in a shutdown condition. Both CTS 3.8.1.1 and 3.8.1.2 provide the requirements on the fuel oil system needed to support the OPERABILITY of the associated EDG. ITS 3.8.3 Actions are provided with a Note that states, "Separate Condition entry is allowed for each EDG." The addition of the Note provides clarity to the CTS by specifically stating that a separate entry is allowed for each EDG.	3.8.3 ACTIONS Note	LCO 3.8.1.1, LCO 3.8.1.2

Table A – Administrative Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.3 A.4	CTS 3.8.1.1 Actions do not specifically state Required Actions for an EDG if sufficient fuel oil is not available. ITS Condition G states, “Required Action and associated Completion Time for Condition C, D, E, or F not met, or one or more EDGs diesel fuel oil or starting air systems not within limits for reasons other than Condition C, D, E, or F, declare associated EDG inoperable immediately.” Starting air requirements are addressed in DOC M.1. This changes the CTS by specifically stating that if Actions are not met, the associated EDG would be declared inoperable.	3.8.3, Condition G	3.8.1.1 Actions
3.8.3 A.5	CTS Surveillance 4.8.1.1.2 specifies that each EDG shall be tested in accordance with CTS Table 4.8.2. This requirement is modified in ITS Section 3.8.1 and specifies the frequency of testing an EDG as 31 days. CTS requirement 4.8.1.1.2.a.2 requires the verification of fuel oil tank level to support the OPERABILITY of the EDG. ITS SR 3.8.3.1 requires verification of fuel oil volume every 31 days. This changes the CTS by specifically stating the frequency for verification of fuel oil tank level as 31 days	SR 3.8.3.1	4.8.1.1.2, 4.8.1.1.2.a.2
3.8.4 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.8.4 A.2	CTS Surveillance Requirements 4.8.2.3.2 c.1 for the station batteries and 4.8.1.1.3 c.1 for the EDG batteries require, at least once per 18 months, the verification that battery cells, cell plates, and battery racks show no visual indication of physical damage or abnormal deterioration. ITS SR 3.8.4.3 requires the verification of station and EDG battery cells, cell plates, and racks show no visual indication of physical damage or abnormal deterioration that could degrade battery performance. This changes the CTS requirements by adding the clarification, “that could degrade battery performance.”	SR 3.8.4.3	4.8.2.3.2.c.1 4.8.1.1.3.c.1
3.8.4 A.3	CTS 4.8.2.3.2 e and f Surveillance Requirements for the station batteries, and 4.8.1.1.3 d and e for the EDG batteries, both require a test to verify battery capacity. Each battery is tested every 60 months to ensure capacity is at least 80% of the manufacturer’s rating during a performance discharge test. A discharge test is required every 18 months if the battery shows signs of degradation, or has reached 85% of its service life. ITS SR 3.8.4.9 requires the verification of the station and EDG battery capacity ≥ 80% of the manufacturer’s rating when subjected to a performance discharge test or a modified performance discharge test. The allowance of the modified performance discharge test is addressed in a less restrictive change L.1. The Frequency requirements for the SR are 60 and 18 months when the battery shows degradation or has reached 85% of expected life. This change retains the CTS requirements for the batteries by expressing the testing requirements in a conditional Frequency.	SR 3.8.4.9	4.8.2.3.2.e, 4.8.2.3.2.f, 4.8.1.1.3.d, 4.8.1.1.3.e

Table A – Administrative Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.4 A.4	CTS Surveillance Requirement 4.8.1.1.3 provides the testing requirements and acceptance criteria for determining EDG DC system OPERABILITY. These requirements relate to the OPERABILITY of the associated EDG in LCO 3.8.1.1. ITS LCO 3.8.4 is constructed to include the LCO, Condition, and SRs for the EDG’s DC system. This change retains the CTS requirements for the EDG’s DC system and ensures the EDG’s OPERABILITY requirements are maintained.	LCO 3.8.4	4.8.1.1.3
3.8.4 A.5	CTS LCO 3.8.2.3 is modified with the requirement that the DC electrical power subsystem on the other unit that supplies the DC electrical power for each required Service Water (SW) pump must be OPERABLE for this unit. This requirement is derived from the CTS LCO 3.7.4.1, Service Water System – Operating. ITS LCO 3.8.4 states that the following DC electrical power subsystems shall be OPERABLE, including, “ One DC electrical power subsystem on the other unit for each required shared component.” This maintains the CTS requirements for the shared components, powered from the other unit that are required by this unit.	LCO 3.8.4	LCO 3.8.2.3, LCO 3.7.4.1
3.8.4 A.6	CTS LCO 3.8.2.3 Actions are modified with the requirement that the DC electrical power subsystem on the other unit that supplies the DC electrical power for each required shared components that must be OPERABLE for this unit. This requirement is derived from the CTS LCO 3.7.4.1, Service Water System – Operating. ITS LCO 3.8.4 Condition D states, “one or more required LCO 3.8.4.c DC electrical power subsystem(s) inoperable, declare associated shared component(s) inoperable, immediately.” A Note that states “Separate Condition entry is allowed for each DC subsystem” modifies condition D. This maintains the CTS requirements for the shared components, powered from the other unit that are required by this unit.	LCO 3.8.4, Condition D	LCO 3.8.2.3
3.8.5 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.8.5 A.2	CTS 4.8.1.2 requires the performance of Surveillance Requirement 4.8.1.1.3 for a required EDG. ITS LCO 3.8.5, “DC Sources – Shutdown,” states, “EDG DC system shall be OPERABLE for the EDG required by LCO 3.8.2, ‘AC Sources – Shutdown.’” ITS Action B states that with the required EDG DC system inoperable, enter the applicable Conditions and Required Actions for the associated EDG immediately. This changes the CTS requirements by specifying the EDG DC subsystems shall be OPERABLE and providing Required Actions for an inoperable EDG DC subsystem.	LCO 3.8.5, Action B	4.8.1.2, 4.8.1.1.3

Table A – Administrative Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.6 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.8.6 A.2	CTS testing requirements for station and EDG batteries are contained in Surveillance Requirements 4.8.2.3.2 and 4.8.1.1.3. ITS LCO 3.8.6 is structured to implement the CTS SRs in a standard format for the battery cell parameters. The LCO states, "Battery cell parameters for station Train H and Train J, and EDG batteries shall be within limits." The Applicability for the LCO is stated as, "When associated DC electrical power subsystems or EDG DC systems are required to be OPERABLE." A Note is added for the proposed Actions that states, "Separate Condition entry is allowed for each battery." This changes the CTS by specifying an LCO, Applicability, and Note for the Actions that do not currently exist.	LCO 3.8.6, 3.8.6 Applicability, ACTIONS Note	4.8.2.3.2, 4.8.1.1.3
3.8.6 A.3	CTS 4.8.2.3.2 and 4.8.1.1.3 Surveillance Requirements provide testing requirements for the station and EDG batteries. The requirements include the Category A and B limits of Table 4.8-3 for the station and EDG batteries, and electrolyte temperature for station batteries. CTS Table 4.8-3 lists the allowable value limit for battery cell parameters under Category B limits. ITS LCO 3.8.6 Action B lists three Conditions for the associated batteries. The first Condition is Required Action and associated Completion Time of Condition A not met. Condition A specifies, for station and EDG batteries cell parameters not within Category A or B limits, specific Required Actions to be performed to ensure OPERABILITY of the battery. The second Condition of Action B states one or more station batteries with average electrolyte temperature for the representative cells < 60 °F. The third Condition states one or more station or EDG batteries with one or more battery cell parameters not within Table 3.8.6-1 Category C values. The associated battery is declared inoperable immediately if any part of the Condition B is met. This changes the CTS by specifying specific Conditions for ITS Action B.	3.8.6, ACTION B	4.8.2.3.2, 4.8.1.1.3, Table 4.8-3
3.8.6 A.4	CTS LCO 3.7.4.1 requires the normal and emergency power supplies to be OPERABLE for the required Service Water pumps. Requirements for Main Control Room and Emergency Switchgear Room fans and Auxiliary Building central exhaust fans may require electrical power from the other unit. ITS LCO 3.8.6 is modified to include the Station and EDG batteries on the other unit that are required to support shared components that are powered for the other unit. This change maintains the CTS requirements in the ITS format.	LCO 3.8.6	LCO 3..4.1

Table A – Administrative Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.7 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.8.7 A.2	CTS 3.8.2.1 for the Onsite Power Distribution Systems lists A.C. Distribution – Operating requirements. CTS LCO 3.8.2.1 states, "The following A. C. electrical busses shall be OPERABLE." The requirement specifies 4 120-volt AC electrical buses are energized from their associated inverter. The inverter receives its power from the associated DC bus. ITS LCO 3.8.7, "Inverters – Operating" requires the H and J Train inverters to be OPERABLE. This changes the CTS by dividing the onsite AC power system into sources and distribution systems.	LCO 3.8.7	LCO 3.8.2.1
3.8.7 A.3	CTS 3.8.2.1 Action c states that with one AC vital bus not energized from its associated inverter re-energize the inverter within 24 hours. ITS LCO 3.8.7 Action A states that with one inverter inoperable, restore the inverter to OPERABLE status in 24 hours. This changes the CTS by specifying the 120 VAC inverter as the electrical power source for the 120-volt AC bus.	3.8.7, ACTION A	3.8.2.1, Action c
3.8.7 A.4	CTS 3.8.2.1 Action c. states that with the AC Vital bus not energized from its associated inverter, re-energize the AC Vital bus from its associated inverter within 24 hours. ITS LCO 3.8.7, Action A, states that with one inverter inoperable, restore the inverter to OPERABLE status within 24 hours. The Action is modified by a Note that states, "Enter applicable Conditions and Required Actions of LCO 3.8.9, "Distribution Systems – Operating" with any vital bus de-energized." This changes the CTS by providing a reminder to take action for the AC vital bus system that may be affected by the inoperability of an inverter.	3.8.7, ACTION A Note	3.8.2.1, Action c
3.8.8 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.8.8 A.2	CTS LCO 3.8.2.2 states that as a minimum either the H or J train AC and DC buses shall be OPERABLE. The H train specifies the two 120 VAC buses (1-1 and 1-2 or 2-1 and 2) are energized from their associated inverter. The J train similarly states that the two 120 VAC buses (1-3 and 1-4 or 2-3 and 2-4) are energized from their associated inverter. ITS LCO 3.8.8 states, "Inverters shall be OPERABLE to support the onsite Class 1E AC vital bus electrical power distribution subsystem(s) required by LCO 3.8.10, 'Distribution System – Shutdown.'" This changes the CTS by dividing the inverter and distribution requirements into two specifications.	LCO 3.8.8	LCO 3.8.2.2

Table A – Administrative Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.		Description of Change	ITS Requirement	CTS Requirement
3.8.9	A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
3.8.9	A.2	Not used.	N/A	N/A
3.8.9	A.3	ITS Action G states that with two trains of inoperable distribution subsystems that result in a loss of safety function, enter LCO 3.0.3 immediately. The CTS does not include this specific requirement. This changes the CTS by specifically requiring entry into LCO 3.0.3 when a loss of function occurs.	3.8.9 ACTION G	None
3.8.9	A.4	CTS LCO 3.8.2.1 states that the following AC electrical busses shall be OPERABLE and energized with the tie breakers open between redundant busses. These buses include H and J trains of AC 4160 and 480 volts subsystems. This requirement also includes that each of the four 120-volt AC vital buses is energized from its associated inverter that is powered from an associated 125-volt DC bus. CTS LCO 3.8.2.3 requires the following DC bus trains to be energized and OPERABLE with tie breakers between bus trains open. The trains consists of two 125-volt DC buses, two batteries, and a charger. The makeup of the 4160, 480, and 120 volt AC buses and the DC buses is addressed by DOC LA.2. The requirement that all buses are energized is addressed by DOC LA.1. ITS LCO 3.8.9 requires that the H and J Trains of AC, DC, and AC vital bus electrical power distribution subsystems shall be OPERABLE. This changes the CTS by combining the requirements for AC and DC distribution systems into one specification.	LCO 3.8.9	LCO 3.8.2.1, LCO 3.8.2.3
3.8.9	A.5	CTS LCO 3.7.4.1 requires the normal and emergency power supplies to be OPERABLE for the required Service Water pumps. The Control Room ventilation fans and the Auxiliary Building central exhaust fans may require electrical power from the other unit for fans to be considered OPERABLE. ITS LCO 3.8.9, Actions, and Surveillance Requirements are modified to include the electrical distribution systems on the other unit that are required to support shared components that are powered for the other unit. This change maintains the CTS requirements in the ITS format.	LCO 3.8.9	LCO 3.7.4.1
3.8.10	A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various

Table A – Administrative Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.		Description of Change	ITS Requirement	CTS Requirement
3.8.10	A.2	ITS 3.8.10 Required Action A.2.5 states, “Declare associated required residual heat removal subsystem(s) inoperable and not in operation.” This is required with a Completion Time of “Immediately.” CTS 3.8.2.2 does not specifically state this requirement. This changes the CTS by specifically requiring the RHR subsystem(s) to be declared inoperable with a loss of the associated electrical bus.	3.8.10, Required Action A.2.5	None

Table L – Less Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.1 L.1	CTS LCO 3.0.5 allows a system, subsystem, train, component, or device to be considered OPERABLE with an inoperable emergency or normal power source provided its normal or emergency power source is OPERABLE and its redundant system(s), subsystem(s), train(s), component(s), and device(s) are OPERABLE. If the redundant feature is not OPERABLE, a shutdown to a MODE in which the feature is not required must be started within one hour. ITS 3.8.1 Required Action A.2 requires the declaration of required feature(s), with no offsite power available, inoperable when its redundant required feature(s) is inoperable. The Completion Time allowed by the new action is 24 hours from discovery of no offsite power to one train concurrent with inoperability of redundant required feature(s). This changes the CTS to allow 24 hours before declaring a required feature inoperable, when an offsite source and a redundant required feature are inoperable.	3.8.1, Required Action A.2	3.0.5	3
3.8.1 L.2	CTS LCO 3.0.5 allows a system, subsystem, train, component, or device to be considered OPERABLE with an inoperable emergency or normal power source provided its normal or emergency power source is OPERABLE and its redundant system(s), subsystem(s), train(s), component(s), and device(s) are OPERABLE. If the redundant feature is not OPERABLE, a shutdown to a MODE in which the feature is not required must be started within one hour. ITS Required Action B.2 requires the declaration of required feature(s), with no EDG available, inoperable when its redundant required feature(s) is inoperable. The Completion Time allowed by the new action is 4 hours from discovery of inoperable EDG on one train concurrent with inoperability of redundant required feature(s). This changes the CTS to allow 4 hours before declaring a required feature inoperable, with an EDG and a redundant required feature inoperable.	3.8.1, Required Action B.2	3.0.5	3

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.1 L.3	CTS 3.8.1.1 Action b requires that within the next twenty-four hours of one EDG becoming inoperable, the other train’s OPERABLE EDG must be started and fully loaded for one hour in accordance with CTS SR 4.8.1.1.2.a.4. This is required regardless of whether or not the inoperable EDG is restored to OPERABLE status. This is not required to be performed if the absence of any potential for common mode failure can be demonstrated for the OPERABLE EDG. ITS Action B.3 requires a determination that the OPERABLE EDG is not inoperable due to a common cause failure. This evaluation is required to be completed within twenty-four hours or the performance of ITS SR 3.8.1.2 is required. This Surveillance only requires the start of the OPERABLE EDG. This changes the CTS requirements by not requiring the OPERABLE EDG to be run at full load for one hour and eliminates the requirement that the test for the OPERABLE EDG be completed regardless of whether the inoperable EDG is restored to OPERABLE status.	3.8.1, Required Action B.3	3.8.1.1, Action b	4
3.8.1 L.4	CTS LCO 3.0.5 allows a system, subsystem, train, component, or device to be considered OPERABLE with an inoperable emergency or normal power source provided its normal or emergency power source is OPERABLE and its redundant system(s), subsystem(s), train(s), component(s), and device(s) are OPERABLE. LCO 3.0.5 requires a unit shutdown to start within one hour with two offsite circuits inoperable. ITS 3.8.1 Required Action G.1 requires the declaration of required feature(s) with no offsite power available, inoperable when its redundant required feature(s) is inoperable. The Completion Time allowed by the Required Action G.1 is 12 hours from discovery of no offsite power concurrent with inoperability of redundant required feature(s). This changes the CTS by allowing 12 hours before declaring a required feature inoperable.	3.8.1, Required Action B.1	3.0.5	3

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.1 L.5	CTS surveillance requirement 4.8.1.1.2.a requires that each EDG be demonstrated OPERABLE in accordance with the frequency specified in Table 4.8-2 on a STAGGERED TEST BASIS (STB). CTS Table 4.8-2 specifies the test frequency based on the number of failures that have occurred in testing each EDG during the previous 20 or 100 tests. If the number of failures do not exceed the specified limit, testing is to be performed every 31 days. If failures occur above the specified limits, then testing is conducted every 7 days. ITS SR 3.8.1.2 states that each EDG be started and reach steady state voltage and frequency within a fixed Frequency of 31 days. This changes the CTS by eliminating the requirements to test on a staggered test basis and an increasing frequency of testing based on the number of test failures.	SR 3.8.1.2	4.8.1.1.2.a, Table 4.8-2	7
3.8.1 L.6	CTS requirements 4.8.1.1.2.d.3, 4, and 5 state that an EDG will respond to a loss of offsite power, an ESF actuation, and a loss of offsite power in conjunction with ESF actuation. These requirements do not specifically state that an actual or simulated signal may be used for the requirements. ITS SRs 3.8.1.10, 3.8.1.11, 3.8.1.12, and 3.8.1.17 state the EDG may be started for these requirements with an actual or simulated signal. This changes the CTS to allow either an actual or simulated signal to be credited in the performance of these requirements.	SR 3.8.1.10, SR 3.8.1.11, SR 3.8.1.12, and SR 3.8.1.17	4.8.1.1.2.d.3, 4.8.1.1.2.d.4, 4.8.1.1.2.d.5	6
3.8.1 L.7	Unit 2 CTS requirement 4.8.1.1.1.b requires the demonstration of OPERABILITY for the alternate offsite circuit by the manual transferring of the onsite Class 1E power source from the normal circuit to the alternate circuit every 18 months with the plant shutdown. The ITS does not include this requirement for Unit 2. This change eliminates the CTS requirement.	None	Unit 2 4.8.1.1.1.b	5

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.1 L.8	CTS Surveillance 4.8.1.1.2.e describes the testing that must be performed following any modification that could affect EDG interdependence. ITS 3.8.1 does not include these testing requirements.	None	4.8.1.1.2.e	5
3.8.1 L.9	CTS Surveillance Requirements 4.8.1.1.1 and 4.8.1.1.2 contain the requirements to perform various testing “during shutdown.” Surveillance Requirement for 4.8.1.1.2.d is required to be performed during shutdown. ITS SR 3.8.1.11 states in a Note that the required Surveillance shall not be performed in MODE 1 or 2. This changes the CTS requirements for testing of the AC sources by allowing the listed test to be performed in MODES 3 or 4.	SR 3.8.1.11 Note	4.8.1.1.1 and 4.8.1.1.2	6
3.8.1 L.10	CTS Surveillance Requirements 4.8.1.1.1 and 4.8.1.1.2 contain requirements to perform various testing “during shutdown.” ITS SRs 3.8.1.8, 3.8.1.9, 3.8.1.12, and 3.8.1.13 add a Note that restricts performance of the SRs in MODES 1 and 2. The Note is modified with an allowance that the SR may be performed for the purpose of re-establishing OPERABILITY for inoperable equipment. This changes the CTS by allowing the specified surveillances to be performed in a MODE that is not currently allowed.	Note to SR 3.8.1.8, SR 3.8.1.9, SR 3.8.1.12, and SR 3.8.1.13	4.8.1.1.1 and 4.8.1.1.2	6

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.1 L.11	CTS LCO 3.7.4.1, Service Water System – Operating, states, “Two service water loops (shared with the other unit) shall be OPERABLE with each loop consisting of two OPERABLE service water pumps (excluding auxiliary service water pumps) with their associated normal and emergency power supplies, and an OPERABLE flow path” Each unit’s service water system requirements consist of the above requirements for either unit operating in MODES 1, 2, 3, or 4. ITS LCO 3.7.10 specifies the requirements for the Main Control Room (MCR) / Emergency Switchgear Room (ESGR) Habitability System. This system requires the MCR and ESGR fans on both units to be OPERABLE in MODES 1, 2, 3, and 4 and during the movement of recently irradiated fuel assemblies. ITS LCO 3.7.12 requires the fans from the Auxiliary Building central exhaust system to be OPERABLE to support the Emergency Core Cooling System (ECCS) Pump Room Exhaust Air Cleanup System. This could require a fan powered from the other unit to be required for this unit. The SW pumps and the fans from the ventilation systems are components that may be required by either or both units. Therefore, these pumps and fans are classified as “shared components,” for the electrical power requirements. ITS LCO 3.8.1 Actions A, B, and C provide for an evaluation of all safety functions powered by this unit’s AC sources and provide 72 hours for an inoperable offsite circuit and up to 14 days for an inoperable EDG. ITS 3.8.1 Action D for one or more offsite circuit(s), and Actions E and F for an inoperable EDG on the other unit that is needed to support a shared components. This changes the CTS by allowing a shared components to be considered OPERABLE for up to 72 hours with a required offsite circuit(s) inoperable and up to 14 days for an inoperable EDG on the other unit.	LCO 3.7.10, LCO 3.7.12, LCO 3.8.1 Actions A, B, C, D, E, and F	3.7.4.1	4

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.1 L.12	CTS SR 4.8.1.1.2.d.2 states, “Verifying that the load sequencing timers are OPERABLE with times within the tolerances shown in Table 3.8-1.” If the requirement can not be met, the EDG is declared inoperable and the appropriate Action entered. ITS LCO 3.8.1.c requires the following AC electrical sources shall be OPERABLE with the sequencing timing relays for Train H and Train J. ITS Required Action K.1 states with one or more sequencing timing relay(s) inoperable, immediately enter appropriate Conditions and Required Actions for system, subsystem, or component made inoperable by sequencing timing relay(s). Required Action K.2.1 states, “Place the component(s) with the inoperable sequencing timing relay in a condition where it can not automatically load to the associated emergency electrical bus.” Required Action K.2.2 provides an option to declare the associated EDG inoperable. This changes the CTS requirements by allowing a system, subsystem or component served by an inoperable sequencing timing relay to be declared inoperable, instead of the electrical source(s).	LCO 3.8.1.c, Required Action K.2.1, Required Action K.2.2	4.8.1.1.2.d.2	1
3.8.1 L.13	CTS Surveillance Requirement 4.8.1.1.2.d.7 states, “Verifying that the auto-connected loads to each EDG do not exceed the 2000 hour rating of 3000 kw.” ITS 3.8.1 does not require the verification of loading limit to ensure OPERABILITY of the EDGs. This changes the CTS by deleting the surveillance requirement.	None	4.8.1.1.2.d.7	5

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.1 L.14	CTS 3.8.1.1 Action b states that the OPERABLE EDG must be demonstrated to be OPERABLE within 24 hours unless the absence of any potential common mode failure is demonstrated. This is required if the inoperable EDG inoperability is due to any cause “other than an inoperable support system, an independently testable component, or preplanned preventive maintenance or testing,” ITS Required Action B.3 states “Determine OPERABLE LCO 3.8.1.b EDG is not inoperable due to common cause failure.” This changes the CTS by allowing a determination for common cause failure, instead of requiring a demonstration for a potential common mode failure, for the OPERABLE EDG.	3.8.1 Required Action B.3	3.8.1.1 Action b	4
3.8.1 L.15	CTS Surveillance Requirement 4.8.1.1.2 contains the requirement to perform various tests for the EDGs “during shutdown.” ITS SRs 3.8.1.10, 3.8.1.11, 3.8.1.15, 3.8.1.16, and 3.8.1.17 are modified in a Note that states the Surveillance shall not normally be performed in specific MODES. An additional statement modifies the Note. It allows a full or partial Surveillance to be performed to reestablish OPERABILITY provided an assessment determines the safety of the unit is maintained or enhanced. This changes the CTS requirements for testing of the EDGs by allowing the listed tests to be performed in MODES in which they are normally prohibited from being conducted.	Note to SR 3.8.1.10, SR 3.8.1.11, SR 3.8.1.15, SR 3.8.1.16, and SR 3.8.1.17	4.8.1.1.2	6

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.1 L.16	CTS 4.8.1.1.2.a.3 states, “Verifying the fuel oil transfer pump can be started and transfers fuel from the storage tank to the day tank.” This requirement shall be performed with a frequency specified in Table 4.8-2 on a Staggered Test Basis (STB). Table 4.8-2 states that the EDG test schedule is once per 31 days when the number of test failures is less than one in the past 20 valid tests, and once per 7 days if the number of test failures is two or more in the previous 20 valid tests. ITS SR 3.8.1.6 states, “Verify each required fuel oil transfer pump operates to transfer fuel oil from the storage tank to the day tank,” and the requirement is required to be performed every 92 days. This changes the CTS by decreasing the SR Frequency from 7 or 31 days on a STB to every 92 days.	3.8.1.6	4.8.1.1.2.a.3, Table 4.8-2	7
3.8.1 L.17	CTS 4.8.1.1.1.2.c states that every 184 days the EDG will be started within 10 seconds by one of the following signals on a rotating test basis. The signals are a simulated loss of offsite power, simulated loss of offsite power with an ESF actuation, and an ESF actuation. The start requires specific values of voltage and frequency to be obtained within specified limits. ITS SR 3.8.1.7 states that each EDG is started within 10 seconds every 184 days. The start requires specific values of voltage and frequency to be obtained within specified limits. This changes the CTS by eliminating the specific start signals.	SR 3.8.1.7	4.8.1.1.1.2.c	6
3.8.1 L.18	CTS Surveillance Requirement 4.8.1.1.2 contains the requirement to perform various testing “during shutdown.” ITS SR 3.8.1.18 removes the MODE restrictions for performing the required testing. This changes the CTS requirements for testing of the AC sources by allowing this test to be performed in any MODE.	SR 3.8.1.18	4.8.1.1.2	6

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.1 L.19	CTS surveillance requirements 4.8.1.1.2 a.4, c, d.3, d.4, d.5.b, d.6, d.10, and e state that the EDG shall be started and are modified by a note labeled **. The note requires the test to be conducted in accordance with the manufacturer's recommendations, "regarding engine prelube and warmup procedure, and as applicable regarding loading recommendations." ITS SRs 3.8.1.7, 3.8.1.10, 3.8.1.11, 3.8.1.14, 3.8.1.17, and 3.8.1.18 state this allowance as a Note to each SR. The Note states, "All EDG starts may be preceded by an engine prelube period." No loading requirements for the SRs have been included because they were not appropriate. This changes the CTS by not requiring the manufacturer's recommendations to be followed, because the ITS states that these recommendations "may" be followed.	Note to SR 3.8.1.7, SR 3.8.1.10, SR 3.8.1.11, SR 3.8.1.14, SR 3.8.1.17, SR 3.8.1.18	Footnote ** to 4.8.1.1.2.a.4, 4.8.1.1.2.c, 4.8.1.1.2.d.3, 4.8.1.1.2.d.4, 4.8.1.1.2.d.5.b, 4.8.1.1.2.d.6, 4.8.1.1.2.d.10, 4.8.1.1.2.e	6
3.8.2 L.1	CTS 3.8.1.2 Action a requires with less than the minimum required A.C. electrical power sources of one train (one circuit, between the offsite transmission network and the onsite Class 1E distribution system, and one diesel generator) immediately suspend all operations involving specific tasks. These activities include CORE ALTERATIONS, positive reactivity changes, and the movement, or movement of load over, irradiated fuel assemblies. ITS 3.8.2 Action A.1 adds an allowance to this requirement. This allows the affected required feature(s) with no offsite power available to be declared inoperable and enter the feature(s) Conditions and Required Actions requirements for the specific function. This would allow the utilization of the feature(s) Required Actions while continuing with activities, such as a plant cooldown. The CTS requirements do not allow this provision.	3.8.2 Required Action A.1	3.8.1.2 Action a	4

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.2 L.2	CTS surveillance requirement 4.8.1.2 states, “The above required A.C. electrical power sources shall be demonstrated OPERABLE by the performance of each of the Surveillance Requirements of 4.8.1.1.1, 4.8.1.1.2, 4.8.1.1.3, and 4.8.1.1.4.” ITS SR 3.8.2.1 states the required SRs but adds a Note which states, “The following SRs are not required to be performed: SR 3.8.1.3, SR 3.8.1.6, SR 3.8.1.9, SR 3.8.1.13, SR 3.8.1.14, and SR 3.8.1.15.” This changes the CTS to allow specific surveillance requirements to not be performed on the required equipment during the time that only one offsite source and one EDG are required to be OPERABLE.	SR 3.8.2.1 Note	4.8.1.2	6
3.8.2 L.3	CTS Surveillance Requirement 4.8.1.2 states, “The above required A.C. electrical power sources shall be demonstrated OPERABLE by the performance of each of the Surveillance Requirements of 4.8.1.1.1, 4.8.1.1.2, 4.8.1.1.3, and 4.8.1.1.4.” ITS SR 3.8.2.1 states that the listed SRs are applicable. The list is composed of SRs 3.8.1.1, 3.8.1.2, 3.8.1.3, 3.8.1.4, 3.8.1.5 3.8.1.6, 3.8.1.7, 3.8.1.9, 3.8.1.13, 3.8.1.14, and 3.8.1.15. This changes the CTS by not requiring Surveillances 4.8.1.1.1.b, 4.8.1.1.2.d.2, 4.8.1.1.2.d.3, 4.8.1.1.2.d.4, 4.8.1.1.2.d.5, and 4.8.1.1.2.e to be performed on the AC circuit and EDG that are OPERABLE.	SR 3.8.2.1	4.8.1.2	6
3.8.2 L.4	CTS 3.8.1.2 Action a. specifies with less than the required AC electrical sources OPERABLE, operations involving positive reactivity changes shall be immediately suspended. ITS 3.8.2 Required Actions B.2.3 and C.3 modify this requirement and state, “Suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration.” This changes the CTS requirement by allowing operations that are a positive reactivity change.	3.8.2 Required Actions B.2.3 and C.3	3.8.1.2 Action a	4

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.2 L.5	CTS LCO 3.8.1.2 Applicability states, “loads over irradiated fuel assemblies when no fuel assemblies are in the reactor vessel.” CTS 3.8.1.2 Action a. requires with less that the minimum required A.C. electrical power sources, all operations involving movement of loads over irradiated fuel assemblies shall be immediately suspended. ITS LCO and Actions of 3.8.2 do not specify these requirements. This changes the CTS by deleting the applicability during movement of loads over irradiated fuel assemblies.	None	3.8.1.2 Applicability 3.8.1.2 Action a	2
3.8.2 L.6	The Applicability for CTS 3.8.2.1, AC sources, states, “during the movement of irradiated fuel assemblies.” The associated Action states with the required AC sources not fully OPERABLE immediately suspend all operations involving movement of irradiated fuel assemblies. ITS LCO 3.8.5 Applicability states, “during the movement of recently irradiated fuel assemblies.” This changes the CTS by restricting the AC sources requirements to during the movement of fuel assemblies that have been recently irradiated.	LCO 3.8.5 Applicability	3.8.2.1 Applicability	2
3.8.3 L.1	CTS 3.8.1.1 requirements for diesel fuel oil states the fuel oil tanks will contain 45,000 gallons each to support the EDGs’ OPERABILITY requirements. If the volume is less than this amount, the associated EDGs are to be declared inoperable. ITS 3.8.3 Condition C allows 48 hours to restore a fuel oil level to 45,000 gallons, provided the level is 38,600 gallons or greater, before declaring the EDG(s) inoperable. This changes the CTS by allowing the diesel fuel oil requirement to decrease below the current limit.	3.8.3 Condition C	3.8.1.1	4
3.8.3 L.2	Not used.	N/A	N/A	N/A

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.3 L.3	CTS 3.8.1.1.2.b states that every 92 days a sample from the fuel oil storage tank is verified to be within acceptable limits. If this requirement can not be met, the associated EDGs are declared inoperable. ITS Action E states that with one or more EDGs with new fuel oil properties not within limits, 30 days is allowed to restore stored fuel oil properties within limits. This changes the CTS by allowing 30 days to restore fuel oil within required limits.	3.8.3 Action E	3.8.1.1.2.b	3
3.8.4 L.1	CTS Surveillance Requirements 4.8.2.3.2 e. and 4.8.1.1.3 d. require verification at least every 60 months that the station and EDG battery capacity is at least 80% of the manufacturer's rating when subjected to a performance discharge test. ITS SR 3.8.4.9 requires verification that the station and EDG battery capacity is $\geq 80\%$ of the manufacturer's rating when subjected to a performance discharge test or a modified performance discharge test. This changes the CTS by allowing a modified performance discharge test to be substituted for a performance discharge test.	SR 3.8.4.9	4.8.2.3.2.e 4.8.1.1.3.d	6
3.8.4 L.2	CTS Surveillance Requirements 4.8.2.3.2 b.2 and 4.8.1.1.3 b.2 require, for the station and EDG batteries that no visible corrosion is detected at either terminals or connectors within 7 days after a battery discharge below 110 volts or overcharge above 115 volts. The connection resistance of these items is limited to less than 150 micro-ohms. ITS SR 3.8.4.2 requires, for the station and EDG batteries, no visible corrosion at the battery terminal connections and connectors be detected, or the battery connection resistance is $\leq 1.5 \text{ E-4 ohms}$ for the inter-cell, inter-rack, inter-tier, or terminal connections. This changes the CTS by eliminating the verification of visible corrosion or connection resistance after a battery discharge or overcharge.	SR 3.8.4.2	4.8.2.3.2.b.2 and 4.8.1.1.3.b.2	6

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.4 L.3	CTS Surveillance Requirements 4.8.2.3.2 d, e, and f, and 4.8.1.1.3 d. and e. contain the requirement to perform various tests for batteries “during shutdown.” ITS SRs 3.8.4.8 and 3.8.4.9 are modified in a Note that states the Surveillance shall not normally be performed in specific MODES. An additional statement modifies the Note. It allows a partial Surveillance to be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced. This changes the CTS requirements for testing of the EDGs by allowing the listed tests to be performed in MODES in which they are normally prohibited from being conducted.	SR 3.8.4.8, SR 3.8.4.9	4.8.2.3.2.d, 4.8.2.3.2.e, 4.8.2.3.2.f, 4.8.1.1.3.d 4.8.1.1.3.e.	6
3.8.4 L.4	CTS Surveillance Requirements 4.8.2.3.2 d. requires verification of the station battery capacity when the battery is subjected to a service test. ITS SR 3.8.4.8 requires verification that the station battery capacity when subjected to a service test. The SR is modified by Note 1 that states, “The modified performance discharge test in SR 3.8.4.9 may be performed in lieu of the service test in SR 3.8.4.8.” This changes the CTS by allowing a modified performance discharge test to be substituted for a service test.	SR 3.8.4.8, Note 1	4.8.2.3.2.d	6
3.8.4 L.5	CTS Surveillance Requirement 4.8.2.3.2.c.3 specifies for the battery charger to supply 200 amps at 125 volts for at least 4 hours. ITS SR 3.8.4.6 states, “Verify each required station battery charger supplies ≥ 270 amps at ≥ 125 V for ≥ 4 hours. This changes the CTS by allowing the battery charger voltage to be 125 volts or greater for the required surveillance test.	SR 3.8.4.6	4.8.2.3.2.c.3	6

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.4 L.6	CTS 4.8.2.3.2.c.2 and 4.8.1.1.3.c.2 require that the cell-to-cell and terminal connections for the station and EDG batteries be clean, tight and coated with anti-corrosion material. ITS SR 3.8.4.4 in part states, “For each required station and EDG battery . . . verify battery cell to cell and terminal connections are clean and coated with anti-corrosion material.” This changes the CTS by deleting the “tight” requirement from the surveillance requirement.	SR 3.8.4.4	4.8.2.3.2.c.2, 4.8.1.1.3.c.2	6
3.8.5 L.1	CTS 3.8.2.2 Applicability includes, “During the movement of irradiated fuel assemblies or loads over irradiated fuel assemblies when no fuel assemblies are in the reactor vessel.” ITS 3.8.5 Applicability includes, “During the movement of recently irradiated fuel assemblies.” This changes the CTS by deleting the applicability requirement, “loads over irradiated fuel assemblies when no fuel assemblies are in the in the reactor vessel.” The addition of the word "recently" to the Applicability is discussed in DOC L.5.	3.8.5 Applicability	3.8.2.2 Applicability	2
3.8.5 L.2	CTS 3.8.2.2 Action requires that with less than the minimum DC sources OPERABLE operations, involving CORE ALTERATIONS or positive reactivity additions, be suspended immediately, and corrective action be initiated to restore the required DC source(s) as soon as possible. ITS 3.8.5 Required Action A.1.1 provides an alternative by allowing, “Declare affected required feature(s) inoperable immediately.” This changes the CTS by not requiring the immediate suspension of activities involving CORE ALTERATION or positive reactivity additions.	3.8.5 Required Action A.1.1	3.8.2.2 Action	4

- Change Category:
1 - Relaxation of LCO Requirements
2 - Relaxation of Applicability
3 - Relaxation of Completion Time
4 - Relaxation of Required Action
5 - Deletion of Surveillance Requirement
6 - Relaxation Of Surveillance Requirement Acceptance Criteria
7 - Relaxation Of Surveillance Frequency
8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.5 L.3	CTS 3.8.2.2 Action states with less than the minimum DC sources OPERABLE immediately suspend positive reactivity changes. ITS 3.8.5 Required Action A.2.3 states "suspend reactivity changes that are more positive than necessary to meet the required SDM or refueling boron concentration limit." This changes the CTS by allowing positive reactivity changes that are currently not allowed.	3.8.5 Required Action A.2.3	3.8.2.2 Action	4
3.8.5 L.4	CTS 4.8.2.2.2 for Unit 1 and 4.8.2.1.2 for Unit 2 state the required equipment shall be demonstrated OPERABLE per Surveillance Requirement 4.8.2.3.2. ITS SR 3.8.5.1 includes a Note stating that specified tests are not required to be performed. These include the following SRs: 3.8.4.7, 3.8.4.8, and 3.8.4.9. This changes the CTS by specifically stating that certain SRs are not required to be performed.	SR 3.8.5.1 Note	Unit 1 4.8.2.2.2, Unit 2 4.8.2.1.2	6
3.8.5 L.5	CTS 3.8.2.2 Applicability for the DC source requirement states during the movement of irradiated fuel assemblies. The associated Action states with the required DC buses not fully OPERABLE immediately suspend all operations involving movement of irradiated fuel assemblies. ITS LCO 3.8.5 Applicability states during the movement of recently irradiated fuel assemblies. This changes the CTS by not applying the DC source requirements during the movement of fuel assemblies that have not been recently irradiated.	LCO 3.8.5 Applicability	3.8.2.2 Applicability	2

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.5 L.6	CTS 3.8.2.2 LCO states, “As a minimum, one of the following trains of AC and DC busses shall be OPERABLE and energized in the specified manner.” The LCO lists the equipment that makes up the H and J trains electrical subsystems. ITS LCOs 3.8.7 and 3.8.9 addresses the AC buses for shutdown conditions. ITS LCO 3.8.5 states, “DC electrical power subsystem shall be OPERABLE to support the DC electrical power distribution subsystem(s) required by LCO 3.8.10, “Distribution System – Shutdown.” ITS LCO 3.8.10 requires the “necessary portions” of the DC power distribution subsystems to be OPERABLE to support equipment required to be OPERABLE. This changes the CTS by requiring only the necessary portions of the DC subsystem(s) to be OPERABLE, instead of one train.	LCO 3.8.5, LCO 3.8.7, LCO 3.8.9, LCO 3.8.10	LCO 3.8.2.2	I

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.6 L.1	CTS Table 4.8-3 notes (1) and (2) specify actions for Category A and B parameters not within limits. Note 1 states, “For any Category A parameter(s) outside the limit(s) shown, the battery may be considered OPERABLE provided that within 24 hours all the Category B measurements are taken and found to be within their allowable values, and provided all Category A and B parameter(s) are restored to within limits within the next six days.” Note 2 states, “For any Category B parameter(s) outside the limit(s) shown, the battery may be considered OPERABLE provided that the Category B parameters are restored to within limits within 7 days.” ITS Condition A states, “One or more station or EDG batteries with one or more battery cell parameters not within Table 3.8.6-1 Category A or B limits.” If this condition is entered; Required Action A.2 requires the verification of battery cell parameters in Table 3.8.6-1 meet Category C limits and Required Action A.3 requires the restoration of battery cell parameters to Table 3.8.6-1 Category A and B limits. Category C limit verification is required within 24 hours and once per 7 days thereafter. The time limit for restoring the cell parameters to within the Category A and B limits is 31 days. This changes the CTS by allowing the Category A and B limits to be exceeded for a period of 31 days where the CTS only allows 7 days.	3.8.6 Condition A	Table 4.8-3 notes (1) and (2)	3

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.6 L.2	CTS Table 4.8-3 Battery Surveillance Requirement limits for the electrolyte level, in the Category A and B columns, is greater than the minimum level indication mark, and ≤ ¼ inch mark above the maximum level indication mark. ITS Table 3.8.6-1 states for the Category A and B limits, "> Minimum level indication mark, and ≤ ¼ inch above maximum level indication mark ^(a) ." Note ^(a) states, "It is acceptable for the electrolyte level to temporarily increase above the specified maximum during equalizing charges provided it is not overflowing." This changes the CTS by allowing the electrolyte level to exceed the specified limit under specific conditions.	Table 3.8.6-1, Note (a)	Table 4.8-3	6
3.8.6 L.3	CTS Table 4.8-3, Battery Cell Parameters, note (c) states, "For any cell with voltage below the limit and electrolyte temperature > 3 °F from the average electrolyte temperature, correct the cell voltage for the average temperature." This note applies to Category B for the battery cells' float voltage of ≥ 2.13 volts. ITS 3.8.6 does not require this correction. This changes the CTS by deleting the requirement for cell voltage to be corrected by temperature.	None	Table 4.8-3 Note ©	6
3.8.7 None	N/A	N/A	N/A	N/A
3.8.8 L.1	CTS 3.8.2.2 is applicable in MODES 5 and 6 and during movement of irradiated fuel assemblies or loads over irradiated fuel assemblies when no fuel assemblies are in the reactor vessel. CTS 3.8.2.2 Action also requires suspension of movement of loads over irradiated fuel assemblies. ITS 3.8.8 is applicable in MODES 5 and 6, and during movement of irradiated fuel assemblies. This changes the CTS by deleting the applicability during movement of loads over irradiated fuel assemblies and the associated required action.	3.8.8 Applicability	3.8.2.2 Applicability	2

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.8 L.2	CTS 3.8.2.2 Action states that with less than the minimum required electrical busses OPERABLE, immediately suspend CORE ALTERATIONS, positive reactivity changes, and the movement, or movement of load over, irradiated fuel assemblies. ITS 3.8.8 Action A.1 adds an optional Action allowing the affected required feature(s), without the required buses, to be declared inoperable and enter the feature(s) Conditions and Required Actions requirements for the specific function. This allows the performance of the feature(s) Required Actions while continuing with unit operations, such as a plant cooldown. The CTS requirements do not allow this option.	3.8.8 Action A.1	3.8.2.2 Action	4
3.8.8 L.3	CTS 3.8.2.2 Action requires that with less than the required electrical busses OPERABLE, operations involving positive reactivity changes shall be immediately suspended. ITS 3.8.8 Required Action A.2.3 states, "Suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration." This changes the CTS requirement by allowing limited operations that include a positive reactivity change.	3.8.8 Required Action A.2.3	3.8.2.2 Action	4
3.8.8 L.4	CTS 3.8.2.2 Applicability for the inverter requirement states during the movement of irradiated fuel assemblies. The associated Action states with the required inverter not fully OPERABLE immediately suspend all operations involving movement of irradiated fuel assemblies. ITS LCO 3.8.8 Applicability states during the movement of recently irradiated fuel assemblies. This changes the CTS by excluding the inverter requirement during the movement of fuel assemblies that have not been recently irradiated.	3.8.8 Applicability	3.8.2.2 Applicability	2

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.9 L.1	CTS 3.8.2.1 Actions a and b state that one of the required buses may not be fully energized and each Action provides appropriate time for the inoperable bus to be re-energized. CTS 3.8.2.3 Action a states that with one 125-volt DC bus inoperable, restore the inoperable bus to OPERABLE status within 2 hours. ITS LCO 3.8.9 Conditions A, B, and C state that with one or more of the required AC electrical power distribution subsystems inoperable, DC, or AC vital buses are inoperable. The required buses must be restore to OPERABLE status within specified times. This changes the CTS by allowing more than one required electrical power distribution subsystems or buses to be inoperable.	3.8.9 Conditions A, B, and C	3.8.2.1 Actions a and b, 3.8.2.3 Action a	4
3.8.10 L.1	CTS 3.8.2.2 is applicable during MODES 5 and 6 and during movement of irradiated fuel assemblies or loads over irradiated fuel assemblies when no fuel assemblies are in the reactor vessel. CTS 3.8.2.2 Action also prohibits movement of loads over irradiated fuel assemblies. ITS 3.8.10 is applicable in MODES 5 and 6, and during movement of irradiated fuel assemblies. This changes the CTS by deleting from the applicability the movement of loads over irradiated fuel assemblies and the associated required action.	3.8.10 Applicability	3.8.2.2 Applicability	2
3.8.10 L.2	CTS 3.8.2.2 Action states that with less than the minimum required electrical busses OPERABLE, immediately suspend CORE ALTERATIONS, positive reactivity changes, and the movement, or movement of load over, irradiated fuel assemblies. ITS 3.8.10 Action A.1 adds an optional Action allowing the affected required feature(s), without the required buses, to be declared inoperable and enter the feature(s) Conditions and Required Actions requirements for the specific function. This would allow the performance of the feature(s) Required Actions while continuing with unit operations, such as a plant cooldown. The CTS requirements do not allow this option.	3.8.10 Action A.1	3.8.2.2 Action	4

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.10 L.3	CTS 3.8.2.2 Action requires that with less than the required electrical busses OPERABLE, operations involving positive reactivity changes shall be immediately suspended. ITS 3.8.10 Required Action A.2.3 states, “Suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration.” This changes the CTS requirement by allowing limited operations that includes a positive reactivity change.	3.8.10 Required Action A.2.3	3.8.2.2 Action	4
3.8.10 L.4	CTS 3.8.2.2 for the AC and DC distribution systems in shutdown is applicable during the movement of irradiated fuel assemblies. The associated Action states with the required systems not fully OPERABLE, immediately suspend all operations involving movement of irradiated fuel assemblies. ITS LCO 3.8.10 is applicable during the movement of recently irradiated fuel assemblies. This changes the CTS by excluding distribution systems during the movement of fuel assemblies that have not been recently irradiated.	3.8.10 Applicability	3.8.2.2 Applicability	2
3.8.10 L.5	CTS LCO 3.8.2.2 states, “As a minimum one of the following trains of AC and DC busses shall be OPERABLE . . .” This would require either the H or J train AC and DC buses to be OPERABLE. The H train specifies the two 120 VAC buses (1-1 and 2 or 2-1 and 2) are energized from their associated inverter. The J train similarly states that the two 120 VAC buses (1-3 and 4 or 2-3 and 4) are energized from their associated inverter. ITS LCO 3.8.10 states, “The necessary portion of AC, DC, and AC vital bus power distribution subsystems shall be OPERABLE to support the equipment required to be OPERABLE.” This changes the CTS by requiring only the necessary portions of the AC, DC, and AC vital bus distribution subsystems to be OPERABLE.	LCO 3.8.10	LCO 3.8.2.2	1

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table M – More Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 M.1	CTS 3.8.1.1 Actions would allow the LCO to not be met for an indefinite period of time, as long as the allowed outage time of each individual Action is not exceeded. For example, an EDG may be inoperable for a period of 14 days. During the allowed time, an offsite circuit may become inoperable. This would require a 12-hour action to be entered, until either the EDG or offsite circuit is restored to OPERABLE status. The restoration of either the EDG or offsite circuit is allowed within the CTS Actions for an unlimited period of time. This could allow the LCO to not be met for a period that could exceed many weeks. ITS Required Actions A.3 and B.4 require the restoration of all required features within 17 days from discovery of failure to meet the LCO. This changes the CTS by limiting the total time that any combination of offsite circuits and EDGs may be inoperable to a total of 17 days.	3.8.1, Required Actions A.3 and B.4	3.8.1.1 Actions
3.8.1 M.2	CTS requirement 4.8.1.1.2 for the EDG day tank does not require a periodic surveillance to monitor the fuel oil tank for water. ITS SR 3.8.1.5 requires each EDG's day tank be checked and any accumulated water removed at a Frequency of every 92 days. This changes the CTS by adding an additional Surveillance Requirement.	SR 3.8.1.5	None
3.8.1 M.3	CTS Surveillance Requirement 4.8.1.1.2.d.8 requires that the EDG must be capable of transferring loads to and from offsite electrical source. Once the capability has been demonstrated, in part c) the EDG may, "proceed through its shutdown sequence." ITS SR 3.8.1.15 verifies the capability of the EDG to transfer loads from and to the offsite electrical source. The SR requires in part c that the EDG, "Returns to ready-to-load operation." This changes the CTS by stating that the EDG is capable of re-powering the emergency bus by being returned to the ready-to-load condition.	SR 3.8.1.15	4.8.1.1.2.d.8
3.8.1 M.4	CTS requirement 4.8.1.1.2.d.4 verifies that on an ESF signal without the loss of offsite power, the EDG starts in ≤ 10 seconds with voltage ≥ 3960 V and frequency ≥ 59.5 Hz and operates in a standby condition ≥ 5 minutes. The steady state voltage and frequency are required to be ≥ 3740 and ≤ 4580 volts and ≥ 59.5 and ≤ 60.5 Hz. ITS SR 3.8.1.11 states the EDG will start in ≤ 10 seconds with voltage ≥ 3960 V and frequency ≥ 59.5 Hz and operates in a standby condition ≥ 5 minutes. The steady state voltage and frequency are required to be ≥ 3740 to ≤ 4580 volts and ≥ 59.5 to ≤ 60.5 Hz. The ITS also requires verification that each permanently connected load remains energized from the offsite electrical power system and emergency loads are energized or auto-connected through the sequencing timing relays are energized from the offsite electrical power system. This changes the CTS by requiring the verification of permanently connected loads and auto-connected loads, through their sequencing timing relays, remain energized from offsite circuits.	SR 3.8.1.11	4.8.1.1.2.d.4

Table M – More Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 M.5	CTS SR 4.8.1.1.2.e requires, at least every 10 years, that both EDGs are started simultaneously with a verification that both EDGs start in less than 10 seconds. A minimum voltage and frequency must be obtained at this time to satisfy the requirement. ITS SR 3.8.1.18 states, “Verify when started simultaneously from standby condition, each EDG must obtain minimum voltage and frequency requirements within 10 seconds, and achieve steady state voltage of ≥ 3960 V to ≤ 4580 V and steady state frequency of ≥ 59.5 Hz to ≤ 60.5 Hz.” This changes the CTS by placing a steady state limits on voltage and frequency for the EDG during this test.	SR 3.8.1.18	4.8.1.1.2.e
3.8.1 M.6	CTS SR 4.8.1.1.2.a.4 states that after a successful start of the EDG, “Subsequently, verifying the generator is synchronized, gradually loaded ** to an indicated 2500 - 2600 kW *** and operates for at least 60 minutes.” ITS SR 3.8.1.3 states, “Verify each EDG is synchronized and loaded and operates for ≥ 60 minutes at a load ≥ 2500 kW and ≤ 2600 kW.” Four Notes modify ITS SR 3.8.1.3. Notes 1 and 2 are addressed in DOC A.11. Notes 3 and 4 modify the CTS requirements by stating that the SR shall be conducted on only one EDG at a time, and the SR shall be preceded by and immediately follow, without a shutdown of the EDG, by a successful performance of ITS SR 3.8.1.2 or ITS SR 3.8.1.7.	SR 3.8.1.3 Notes 3 and 4	4.8.1.1.2.a.4
3.8.1 M.7	CTS 4.8.1.1.2.d.1 requires the testing of an EDG with the loss of a load ≥ 610 kW. This requirement does not specify that an EDG shall be tested at a specific power factor. ITS SR 3.8.1.9 requires the verification that each EDG can reject a load equal to or greater than its associated single largest post-accident load. Following the load rejection, the EDG must maintain frequency ≤ 66 Hz and within 3 seconds voltage and frequency must return to the steady state limits. The SR additionally states in a Note, “If performed with EDG synchronized with offsite power, it shall be performed at a power factor ≤ 0.9 . However, if grid conditions do not permit, the power factor limit is not required to be met. Under this condition, the power factor shall be maintained as close to the limit as practicable.” This changes the CTS requirement by specifying a power factor of ≤ 0.9 , if the testing is conducted by synchronizing with the offsite sources.	SR 3.8.1.9 Note	4.8.1.1.2.d.1
3.8.1 M.8	CTS 4.8.1.1.2.d.6 states that each EDG shall be verified to operate at full power for 24 hours. ITS SR 3.8.1.13 includes the above requirements and additionally requires that the EDG shall be operated with a power factor ≤ 0.9 during the 24-hour run in a Note. The Note states, “If performed with EDG synchronized with offsite power, it shall be performed at a power factor ≤ 0.9 . However, if grid conditions do not permit, the power factor limit is not required to be met. Under this condition, the power factor shall be maintained as close to the limit as practicable.” This changes the CTS requirement by adding additional conditions for performing the required Surveillance.	SR 3.8.1.13 Note	4.8.1.1.2.d.6

Table M – More Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.2 M.1	CTS Action a. states that with less than the minimum AC sources OPERABLE specific plant activities (CORE ALTERATIONS, positive reactivity changes, movement of irradiated fuel assemblies, etc.) shall be immediately suspended until the minimum required AC sources are restored to OPERABLE status. ITS Actions B.2.4 and C.4 require that immediate action be initiated to restore the required offsite circuit and EDG to OPERABLE status. This changes the CTS to require immediate action to restore the required AC sources to OPERABLE status.	3.8.2, Required Action B.2.4 and C.4	3.8.1.1, Action a
3.8.3 M.1	CTS LCO 3.8.1.1 does not contain requirements for the EDG starting air subsystems. ITS 3.8.3 LCO, Actions, and Surveillance Requirements add additional requirements on the EDG starting air system. This changes the CTS by placing additional requirements on the support systems required for each EDG to be considered OPERABLE.	3.8.3	None
3.8.3 M.2	CTS 3.8.1.1 Surveillance Requirement 4.8.1.1.2.b contains requirements for fuel oil viscosity, water and sediment. There is no specific Action if the fuel oil exceeds the requirements. ITS 3.8.3 Action D is added to impose specific limits on diesel fuel oil for total particulates. The Action requires the fuel oil total particulate be restored within limits in 7 days. ITS SR 3.8.3.2 requires the verification of new and stored fuel oil properties by testing in accordance with the requirements of the Diesel Fuel Oil Testing Program. This changes the CTS requirements by setting specific limits and testing requirements on diesel fuel oil established by the testing program.	3.8.3 ACTION D, SR 3.8.3.2	4.8.1.1.2.b
3.8.3 M.3	CTS requirement 4.8.1.1.2.b requires verification at least once per 92 days that a sample of diesel fuel from the fuel storage tank is within the acceptable limits for water. ITS SR 3.8.3.4 adds the requirement that water accumulated in the tank will be removed. This changes the CTS by specifying that any water contained in the fuel oil tank will be removed.	SR 3.8.3.4	4.8.1.1.2.b
3.8.4 M.1	CTS Surveillance Requirement 4.8.2.3.2.c.3 specifies for the battery charger to supply 200 amps at 125 volts for at least 4 hours. ITS SR 3.8.4.6 states, “Verify each required station battery charger supplies ≥ 270 amps at ≥ 125 V for ≥ 4 hours. This changes the CTS by increasing the required current for the battery charger from 200 amps to 270 amps.	SR 3.8.4.6	4.8.2.3.2.c.3
3.8.4 M.2	CTS Surveillance Requirements 4.8.2.3.2 c.2 for the station batteries and 4.8.1.1.3 c.2 for the EDG batteries do not require the removal of visible corrosion from each station and EDG battery cell-to-cell and terminal connections. ITS SR 3.8.4.4 for station and EDG batteries states, “remove visible terminal corrosion.” This changes the CTS requirements by specifying that any visible corrosion is removed.	SR 3.8.4.4	4.8.2.3.2.c.2, 4.8.1.1.3.c.2
3.8.5 None	N/A	N/A	N/A

Table M – More Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.6 M.1	CTS Table 4.8-3 notes (1) and (2) require specific actions for Category A and B parameters not within limits. Note 1 states, “For any Category A parameter(s) outside the limit(s) shown, the battery may be considered OPERABLE provided that within 24 hours all the Category B measurements are taken and found to be within their allowable values, and provided all Category A and B parameter(s) are restored to within limits within the next six days.” Note 2 states, “For any Category B parameter(s) outside the limit(s) shown, the battery may be considered OPERABLE provided that the Category B parameters are within their allowable limits and restored to within Category B limits within 7 days.” ITS 3.8.6 Condition A states, “One or more station or EDG batteries with one or more battery cell parameters not within Table 3.8.6-1 Category A or B limits.” If this condition is entered, the Required Actions A.1 requires the verification of pilot cells electrolyte level and float voltage meet Table 3.8.6–1 Category C limits within 1 hour. This changes the CTS by specifying a time of one hour to verify pilot cell electrolyte level and voltage are within limits.	3.8.6, Condition A	3Table 4.8-3, Notes (1) and (2)
3.8.6 M.2	CTS surveillance requirements 4.8.2.3.2.b and 4.8.1.1.3.b state that within 7 days after a battery discharge below 110 volts or an overcharge above 150 volts, that the battery parameters in Table 4.8-3 meet the Category B limits. ITS SR 3.8.6.2 requires that the Station and EDG battery cell parameters be verified to meet Table 3.8.6 – 1 Category B limits every 92 days and once within 24 hours after a battery overcharge to > 115 volts or discharge to < 110 volts. This changes the CTS requirement by requiring the Category B limits are verified within 24 hours where the current requirements allow 7 days.	SR 3.8.6.2	4.8.2.3.2.b, 4.8.1.1.3.b
3.8.6 M.3	CTS Surveillance Requirements 4.8.2.3.2.b for the station batteries and 4.8.1.1.3 for the EDG batteries specify that after an overcharge or a discharge of a battery, the parameters of the Category B limits must be met. The Category B parameters of electrolyte level, float voltage, and specific gravity are listed in Table 4.8–3, and require specific values to be met. The specific gravity limits for Category A and Category B allowable value specify that Note (b) is applicable for the station batteries. Note (b) states, “Or battery charging current is less that 12 amps when on charge (station batteries only).” ITS SR 3.8.6.2 requires verification that the station and EDG Category B battery cell parameters are within limits after a battery overcharge or discharge. The Category B limits listed in Table 3.8.6 – 1 are electrolyte level, float voltage, and specific gravity. Notes (b) and (c) modify the specific gravity requirements. In part, these notes allow a battery charging on float current of less than 2 amps to substitute for direct specific gravity readings for the station and EDG batteries. This changes the CTS requirements by allowing the substitution of charging current of less than 2 amps instead of 12 amps to substitute for specific gravity readings.	SR 3.8.6.2, Table 3.8.6-1	4.8.2.3.2.b, 4.8.1.1.3, Table 4.8-3, Note (b)

Table M – More Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.7 M.1	CTS LCO 3.8.2.1 footnote states, “Two inverters may be disconnected from their D.C. Busses for up to 24 hours as necessary, for the purpose of performing an equalizing charge on their associated batteries provided (1) their vital busses are energized, and (2) the remaining vital busses are energized from their associated inverters and connected to their associated D.C. Busses.” ITS LCO 3.8.7 Note states, “One inverter may be disconnected from its associated DC bus for ≤ 24 hours to perform an equalizing charge on its associated battery, provided: a. The associated AC vital bus is energized from its constant voltage source transformer; and b. All other AC vital buses are energized from their associated OPERABLE inverters.” This changes the CTS by only allowing one inverter to be disconnected and requiring the associated AC bus to be powered from “its constant voltage source transformer.”	LCO 3.8.7 Note	LCO 3.8.2.1 footnote
3.8.7 M.2	CTS 4.8.2.1 states the specified A.C. busses shall be determined OPERABLE at least once per 7 days by verifying indicated power availability. ITS SR 3.8.7.1 requires the verification of the correct inverter voltage to required AC vital buses every 7 days. This changes the CTS by requiring the verification of the correct inverter voltage to the required AC vital buses, where the CTS only requires verification of indicated power.	SR 3.8.7.1	4.8.2.1
3.8.8 M.1	CTS 4.8.2.2.1 states the specified busses shall be energized in the required manner once per 7 days by verifying indicated power availability. ITS SR 3.8.8.1 requires the verification of the correct inverter voltage to required AC vital buses every 7 days. This changes the CTS by requiring the verification of the correct inverter voltage to the required AC vital buses, where the CTS only requires verification of indicated power.	SR 3.8.8.1	4.8.2.2.1
3.8.9 M.1	CTS 3.8.2.1 Action a. states that with one of the required A.C. emergency busses not fully energized, re-energize the bus within 8 hours. Action b. states within one A.C. Vital Bus not energized, re-energize the A. C. Vital bus within 2 hours. CTS 3.8.2.3 Action a states with one 125 VDC bus inoperable, restore the inoperable bus to OPERABLE status within 2 hours. ITS 3.8.9, Action A, states that with one AC subsystem inoperable, restore the subsystem to OPERABLE status within 8 hours and 16 hours from discovery of failure to meet LCO. Action B states that with one AC vital bus inoperable, restore the AC bus to OPERABLE status within 2 hours and 16 hours from discovery of failure to meet LCO. Action C states that with one DC vital bus inoperable restore the DC bus to OPERABLE status within 2 hours and 16 hours from discovery of failure to meet LCO. This changes the CTS by placing a limit of 16 hours for failing to meet the LCO when the CTS does not specify a limit.	3.8.9, ACTIONS A, B, and C	3.8.2.1, Actions a and b, 3.8.2.3, Action a

Table M – More Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.		Description of Change	ITS Requirement	CTS Requirement
3.8.9	M.2	CTS 4.8.2.1 states the specified A.C. busses shall be determined OPERABLE at least once per 7 days by verifying indicated power availability. CTS 4.8.2.3.1 states that each D.C. bus train shall be demonstrated OPERABLE at least once per 7 days by verifying indicated power availability. ITS SR 3.8.9.1 requires the verification of the correct voltage to required AC, DC, and AC vital buses electrical power distribution subsystems every 7 days. This changes the CTS by requiring the verification of the correct voltages to the required AC, DC, and AC vital buses electrical power distribution subsystems, where the CTS only requires verification of indicated power.	SR 3.8.9.1	4.8.2.1, 4.8.2.3.1
3.8.10	M.1	CTS 4.8.2.2.1 states the specified busses shall be determined OPERABLE at least once per 7 days by verifying indicated power availability. ITS SR 3.8.10.1 requires the verification of the correct voltage to required AC, DC, and AC vital buses electrical power distribution subsystems every 7 days. This changes the CTS by requiring the verification of the correct voltages to the required AC, DC, and AC vital buses electrical power distribution subsystems, where the CTS only requires verification of indicated power.	SR 3.8.10.1	4.8.2.2.1

Table R – Relocated Specifications and Removed Details
ITS Section 3.8 – Electrical Power Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.8.1 LA.1	4.8.1.1.2.d.5.c	CTS SR 4.8.1.1.2.d.5.c states that all non-critical EDG trips will be bypassed on a loss of voltage on the emergency bus and/or a safety injection actuation signal. The non-critical trips do not include engine overspeed, generator differential, and EDG output breaker overcurrent. ITS 3.8.1.12 states, "Verify each EDG's automatic trip are bypassed on actual or simulated automatic start signal except engine overspeed and generator differential current. This changes the CTS specifically stating that the non-critical EDG trips are bypassed on any automatic start signal. The specific automatic start signals of a safety injection, a loss of voltage on the emergency bus, and a loss of voltage on the emergency bus with a safety injection actuation are moved to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.8.1 LA.2	4.8.1.1.2.a.5	CTS SR 4.8.1.1.2.a.5 requires the verification that each EDG is aligned to provide standby power to the associated emergency bus. ITS 3.8.1 SRs do not contain this requirement. This changes the CTS by deleting the requirement from the Technical Specifications and moving it to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.8.1 LA.3	N/A	Not used.	N/A	N/A	N/A
3.8.1 LA.4	4.8.1.1.2.d.2	CTS Surveillance Requirement 4.8.1.1.2.d.2 states at least once per 18 months during shutdown, verify that the load sequencing timers are OPERABLE with times within the tolerances shown in Table 4.8-1. ITS SR 3.8.1.16 requires the verification of each sequenced load block is within the design tolerance for each emergency load sequencing timer. This changes the CTS by moving the list of required setpoints, tolerances, and initiating signals from the Technical Specifications to the TRM.	Technical Requirements Manual	10 CFR 50.59	3
3.8.1 LA.5	N/A	Not used.	N/A	N/A	N/A

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.8 – Electrical Power Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.8.1 LA.6	4.8.1.1.2.d.9	CTS Surveillance Requirement 4.8.1.1.2.d.9 requires at least once per 18 months, during shutdown, the verification that the EDG lockout features of the remote local selection switch and the emergency stop switch prevent the EDG from starting. This changes the CTS by moving the requirement for verifying lockout feature requirements from the Technical Specifications to the TRM.	Technical Requirements Manual	10 CFR 50.59	3
3.8.1 LA.7	4.8.1.1.2.f	CTS requirement 4.8.1.1.2.f states once per 24 months during any mode of operation, each EDG will be subjected to a preventive maintenance inspection, in accordance with maintenance procedures appropriate for the diesel used for this class of service. The requirement is not appropriate for the Technical Specifications and is moved to the TRM.	Technical Requirements Manual	10 CFR 50.59	3
3.8.1 LA.8	LCO 3.8.1.1	CTS LCO 3.8.1.1 describes the two required offsite circuits as, “physically independent” and the emergency diesel generators (EDGs) as “separate and independent.” ITS LCO 3.8.1 describes the two offsite circuits as “qualified” and states the requirements for the EDGs as “two.” The descriptive information, “physically independent” and “separate and independent” is not appropriate for the Technical Specification and is moved to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.8.1 LA.9	4.8.1.1.2.d.1	CTS Surveillance Requirement 4.8.1.1.2.d.1 requires verification that on a load rejection of 610 kW, the EDG frequency remains ≤ 66 Hertz and recovers to a steady state voltage and frequency within specified limits. ITS SR 3.8.1.9 utilizes the phrase “single largest post-accident load” and the specific value of 610 kW is moved to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.8.2 None	N/A	N/A	N/A	N/A	N/A

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.8 – Electrical Power Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.8.3 LA.1	LCO 3.8.1.1.b.2, LCO 3.8.1.1.b.3, LCO 3.8.1.2.b.2, LCO 3.8.1.2.b.3	CTS LCO 3.8.1.1.b.2 and 3 and LCO 3.8.1.2.b.2 and 3 state a fuel oil system consisting of two underground tanks each containing a minimum of 45,000 gallons of fuel (This is a shared system with the other unit), and a separate fuel oil transfer system. The inoperability of the fuel oil system affects both units and both units would be required to shutdown if an inoperable fuel oil system were not restored to OPERABLE status within allowed outage times. ITS 3.8.3 does not state the specifics of the fuel oil system, such as the fact that the tanks are underground and that it is a shared system. This information is contained in the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.8.3 LA.2	3.8.1.1 Action f, and 3.8.1.2 Action b	CTS 3.8.1.1 Action f and 3.8.1.2 Action b require, with one underground fuel oil storage tank of 3.8.1.1.b.2 inoperable, the performance of Surveillance 4.8.1.1.4 or tank repairs, and that replacement fuel oil must verified as available. This includes the verification of availability of 50,000 gallons of fuel oil and transportation that can deliver it within a 48-hour period. ITS 3.8.3 Condition A states, “One fuel oil storage tank not within limits,” verify replacement oil is available, prior to removing tank from service. This changes the CTS by moving the details of transportation of 50,000 gallons of fuel oil within a 48-hour period from the Technical Specifications to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.8.3 LA.3	4.8.1.1.2.b	CTS Surveillance Requirement 4.8.1.1.2.b states that the fuel oil tank is within the acceptable limits specified in Table 1 of ASTM D975 when checked for viscosity, water, and sediment. ITS SR 3.8.3.4 states check for and remove accumulated water from each stored fuel oil tank. This changes the CTS by moving the requirements of viscosity and sediment from the Technical Specifications to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.8 – Electrical Power Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.8.3 LA.4	3.8.1.1 Action f, 4.8.1.1.4	CTS 3.8.1.1 Action f allows the inoperability of one underground fuel oil tank for the performance of Surveillance Requirement 4.8.1.1.4 or tank repairs. CTS SR 4.8.1.1.4 requires each underground EDG fuel oil storage tank every 10 years to be drained, the sediment to be removed, and the tank to be inspected for integrity, and cleaned. ITS 3.8.3 does not specify tank cleaning or inspection. This changes the CTS by moving these requirements from the specification to the Technical Requirements Manual (TRM).	Technical Requirements Manual	10 CFR 50.59	3
3.8.4 LA.1	LCO 3.8.2.3	CTS LCO 3.8.2.3 describes the specific 125 volt DC buses and batteries, and associated chargers that define Trains H and J requirements. ITS LCO 3.8.4 does not contain these specific requirements and states that the Train H and J DC electrical power subsystems shall be OPERABLE. This changes the CTS by moving information from the Specifications to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.8.4 LA.2	4.8.2.3.2 f, 4.8.1.1.3.e	CTS surveillance requirements 4.8.2.3.2 f. and 4.8.1.1.3 e. describe the limits of degradation of batteries in terms of capacity. ITS SR 3.8.4.9 does not contain these specific requirements, but continues to require specific testing requirements to ensure battery OPERABILITY. This changes the CTS by moving information from the Specifications to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.8 – Electrical Power Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.8.4 LA.3	3.8.2.3, Action b	CTS Action b. states that when the 125 volt D.C. battery and /or its charger is inoperable, that they must be restored to OPERABLE status within 2 hours or the unit must be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Surveillance requirements for station and EDG batteries specify requirement for the batteries and chargers. ITS Action A requires both Trains of DC Sources to be OPERABLE and if one becomes inoperable, it must be restored within 2 hours or the unit be placed in MODE 3 in the next 6 hours and MODE 5 in the next 30 hours. This changes the CTS by moving the references to batteries and chargers from the specifications to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.8.5 LA.1	LCO 3.8.2.2	CTS LCO 3.8.2.2 lists the specific Train H and J requirements. These consist of the 4160-volt emergency buses, 480-volt buses, 120-volt AC buses, and 125-volt DC buses. ITS LCO 3.8.5 states that the DC electrical power subsystem(s) required by LCO 3.8.10, "Distribution Systems – Shutdown," shall be OPERABLE. ITS 3.8.5 does not contain the list of buses that makeup an electrical train. This changes the CTS by moving the makeup of the electrical train from the Technical Specifications to the ITS Bases of ITS LCO 3.8.9, "Distribution Systems-Operating."	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.8.6 LA.1	4.8.2.3.2 b.3	CTS surveillance requirement 4.8.2.3.2 b.3 states, "Average electrolyte temperature of a least 10 connected cells is above 60 °F." ITS Action B and SR 3.8.6.3 require the "electrolyte temperature of representative cells" to be > 60 °F. This changes the CTS by replacing "10" cells with "representative" cells and moving the 10 cell requirement from the Specification to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.8 – Electrical Power Systems

DOC No.		CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.8.6	LA.2	N/A	Not used.	N/A	N/A	N/A
3.8.7	LA.1	LCO 3.8.2.1 footnote	A footnote to CTS LCO 3.8.2.1 states, “Two inverters may be disconnected from their D.C. Busses for up to 24 hours as necessary, for the purpose of performing an equalizing charge on their associated batteries provided (1) their vital busses are energized, and (2) the remaining vital busses are energized from their associated inverters and connected to their associated D.C. Busses.” ITS LCO 3.8.7 Notes to the Actions state that inverters may be disconnected from their associated DC bus for ≤ 24 hours to perform an equalizing charge on their associated battery under two conditions. Condition one, the associated AC vital bus is energized from its constant voltage source transformer. Condition two, all other AC vital buses are energized from their associated OPERABLE inverters. This changes the CTS by moving the requirement that the remaining vital buses are “connected to their associated D.C. Busses,” from the Specification to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.8.8	None	N/A	N/A	N/A	N/A	N/A

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.8 – Electrical Power Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.8.9 LA.1	LCO 3.8.2.1, LCO 3.8.2.3, 4.8.2.3.1	CTS LCO 3.8.2.1 states, “The following A.C. electrical busses shall be OPERABLE and energized” CTS LCO 3.8.2.3 states, “The following D.C. bus trains shall be energized and OPERABLE” CTS 3.8.2.1 Actions a and b state, “ With one of the required AC or AC Vital Buses not energized, re-energized bus,” within specific allowed outage times. Similarly, CTS SR 4.8.2.3.1 states, “Each D.C. bus train shall be determined OPERABLE and energized” ITS LCO 3.8.9 states, “The Train H and Train J AC, DC, and AC vital bus electrical power distribution subsystems shall be OPERABLE.” ITS SR 3.8.9.1 states, “Verify correct breaker alignments and voltage to required AC, DC, and AC vital bus electrical power distribution subsystems.” This changes the CTS by moving the requirement for the buses to be energized with tie breakers open between redundant buses from the Specification to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.8.9 LA.2	LCO 3.8.2.1, LCO 3.8.2.3	CTS LCO 3.8.2.1 states, “The following A.C. electrical busses shall be OPERABLE . . .H and J A.C. emergency busses,” with 4160, 480, and 120 VAC buses specified. CTS LCO 3.8.2.3 states that the Train A and Train B DC buses with specific designations. ITS 3.8.9 states, “Train H and Train J AC, DC, and AC vital bus electrical power distribution subsystems shall be OPERABLE.” This changes the CTS by moving the specific names of the buses from the Specification to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.8 – Electrical Power Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.8.10 LA.1	LCO 3.8.2.2	CTS LCO 3.8.2.2 states, “The following A.C. electrical busses shall be OPERABLE . . . H and J A.C. emergency busses,” with 4160, 480, and 120 VAC buses specified. ITS 3.8.10 states, “The necessary portion of AC, DC, and AC vital bus electrical power distribution subsystems shall be OPERABLE to support equipment required to be OPERABLE.” This changes the CTS by moving description of the buses from the Specification to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
CTS 3.8.2.5 R.1	Unit 2 3.8.2.5	Unit 2 CTS 3.8.2.5 states the primary and backup containment penetration conductor overcurrent protective devices associated with each containment electrical penetration circuit shall be OPERABLE. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	N/A
CTS 3.8.2.6 R.1	Unit 2 3.8.2.6	Unit 2 CTS 3.8.2.6 states the thermal overload protection devices, integral with the motor starter, of each valve in the safety system shall be OPERABLE. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	N/A
CTS 3.8.2.7 R.1	Unit 2 3.8.2.7	Unit 2 CTS 3.8.2.7 states that all circuits that have containment penetrations and are not required during reactor operations shall be de-energized. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	N/A

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table A – Administrative Changes
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.1 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	None	Various
3.9.1 A.2	CTS LCO 3.9.1 states that with the reactor vessel head unbolted or removed, the boron concentration must be within the limit provided in the LCO. The CTS 3.9.1 Applicability is modified by a footnote that states, "The reactor shall be maintained in MODE 6 when the reactor vessel head is unbolted or removed." ITS 3.9.1 does not include the phrase "with the reactor vessel head unbolted or removed" or the Applicability footnote, since these requirements are included in the ITS MODE definitions and the TS Applicability.	None	LCO .9.1
3.9.1 A.3	CTS 3.9.1 provides requirements on the boron concentration of filled portions of the Reactor Coolant System and the refueling canal. The ITS provides requirements on the boron concentration of the Reactor Coolant System, the refueling canal, and the refueling cavity. The requirements are equivalent.	LCO 3.9.1	3.9.1
3.9.1 A.4	CTS 3.9.1 Action contains the statement, "The provisions of Specification 3.0.3 are not applicable." ITS 3.9.1 does not contain an equivalent statement; it is unnecessary since ITS 3.0.3 does not apply in MODE 6.	None	3.9.1
3.9.2 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	None	Various
3.9.2 A.2	CTS 3.1.1.3.2 states, "The following valves shall be locked, sealed or otherwise secured in the closed position except during planned boron dilution or makeup activities." ITS LCO 3.9.2 states, "Each valve used to isolate primary grade water flow paths shall be secured in the closed position." A Note to the LCO states, "Primary grade water flow path isolation valves may be opened under administrative control for planned boron dilution or makeup activities." ITS SR 3.9.2.1 states, "Verify each valve that isolates primary grade water flow paths is locked, sealed, or otherwise secured in the closed position." The net requirements are equivalent.	SR 3.9.2.1	3.1.1.3.2
3.9.3 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	None	Various

Table A – Administrative Changes
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.3 A.2	CTS 3.9.2 LCO is applicable in MODE 6, but in the Action states, “The provisions of Specification 3.0.3 are not applicable.” CTS LCO 3.0.3 states that the requirement is, “applicable in MODES 1, 2, 3, and 4.” Therefore, LCO 3.0.3 is not applicable in MODE 6. ITS 3.9.3 does not contain this requirement; it is unnecessary since ITS 3.0.3 does not apply in MODE 6.	None	LCO 3.9.2
3.9.4 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	None	Various
3.9.4 A.2	CTS 3.9.4 states, “The provisions of Specification 3.0.3 are not applicable.” CTS 3.9.4 is only applicable during specified conditions of MODE 6. ITS 3.9.4 does not include this statement. ITS LCO 3.0.3 states, “LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4.” The net requirements are equivalent.	None	3.9.4
3.9.4 A.3	CTS 4.9.4 states, in part, "Each of the above required containment building penetrations shall be determined to be either in its closed/isolated condition or capable of being closed by an OPERABLE automatic Containment Purge and Exhaust isolation valve . . . by verifying the penetrations are in their closed/isolated condition." ITS SR 3.9.4.1 states, "Verify each required containment penetration is in the required status." This LCO requirements have not changed, merely the SR referred to them.	SR 3.4.9.1	4.9.4
3.9.4 A.4	CTS 4.9.4.a is modified by a footnote ** which states "If both doors of the containment personnel airlock are open pursuant to Specification 3.9.4.b above, one door shall be verified to be capable of being closed at the above surveillance frequency." ITS SR 3.9.4.1 states, "Verify each required containment penetration is in the required status." This LCO requirements have not changed, merely the SR referred to them.	SR 3.4.9.1	4.9.4, footnote **
3.9.4 A.5	CTS 3.9.4, Footnote *, states that both doors of the containment personnel airlock may be open provided, in part, that there is at least 23 feet of water above the top of the reactor pressure vessel flange during movement of fuel assemblies within the containment. ITS 3.9.4 does not duplicate LCO 3.9.7 requirements; duplication is unnecessary.	None	3.9.4, Footnote *
3.9.5 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	None	Various

Table A – Administrative Changes
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.5 A.2	CTS 3.9.8.1 LCO is modified by a footnote, *, which states that the normal or emergency power source may be inoperable for each RHR loop. ITS 3.9.5 does not include this statement. The ITS definition of "OPERABLE" states that a component is OPERABLE if either the normal or emergency power source is OPERABLE. The CTS and ITS requirements are equivalent.	None	3.9.8.1 Footnote *
3.9.5 A.3	CTS 3.9.8.1, Action b, states, in part, that with less than one RHR loop in operation, suspend all operations involving an increase in the reactor decay heat load or a reduction in boron concentration of the Reactor Coolant System. ITS 3.9.5 states that with the RHR loop requirements not met, suspend operations involving a reduction in reactor coolant boron concentration and suspend loading irradiated fuel assemblies in the core. The CTS and ITS requirements are equivalent, since the only way to increase decay heat in MODE 6 is to add irradiated fuel.	3.9.5 Actions	3.9.8.1, Action b
3.9.5 A.4	CTS 3.9.8.1 Action d. states, "The provisions of Specification 3.0.3 are not applicable." ITS 3.9.5 does not include this statement. ITS LCO 3.0.3 states, "LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4." The CTS and ITS requirements are equivalent.	None	3.9.8.1 Action d
3.9.6 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	None	Various
3.9.6 A.2	CTS 3.9.8.2 LCO is modified by a footnote, *, which states that the normal or emergency power source may be inoperable for each RHR loop. ITS 3.9.6 does not include this statement. The ITS definition of "OPERABLE" states that a component is OPERABLE if either the normal or emergency power source is OPERABLE. The CTS and ITS requirements are equivalent.	None	3.9.8.2 Footnote *
3.9.6 A.3	CTS 3.9.8.2, Action a, states, that with less than the required RHR loops OPERABLE, immediately initiate corrective action to return the required RHR loops to OPERABLE status as soon as possible. ITS 3.9.6, Condition A, states that with less than the required number of RHR loops OPERABLE, immediately initiate action to restore required RHR loops to OPERABLE status or immediately initiate action to establish ≥ 23 feet of water above the top of reactor vessel flange, which is equivalent to the CTS requirement or exiting applicability of LCO which is an option in the CTS	3.9.6, Condition A	3.9.8.2, Action a
3.9.6 A.4	CTS 3.9.8.2 Action c. states, "The provisions of Specification 3.0.3 are not applicable." ITS 3.9.6 does not include this statement. ITS LCO 3.0.3 states, "LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4." The net requirements are equivalent.	None	3.9.8.2, Action c

Table A – Administrative Changes
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.6 A.5	CTS 3.9.8.2, Action b, states, in part, that with less than one RHR loop in operation, suspend all operations involving an increase in the reactor decay heat load or a reduction in boron concentration of the Reactor Coolant System. ITS 3.9.6 states that with no RHR loop in operation, suspend operations involving a reduction in reactor coolant boron concentration. The CTS and ITS requirements are equivalent.	3.9.6 Actions	3.9.8.2, Action b
3.9.7 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	None	Various
3.9.7 A.2	CTS 3.9.10.1 Action contains the statement, "The provisions of Specification 3.0.3 are not applicable." ITS LCO 3.0.3 is only applicable in MODES 1, 2, 3 and 4; therefore the requirements are equivalent.	None	3.9.10.1
3.9.7 A.3	CTS 3.9.10.1 is applicable in MODE 6 during movement of fuel assemblies within containment. ITS 3.9.7 is applicable during the movement of irradiated fuel assemblies within containment. This changes the CTS by eliminating the explicit "MODE 6" portion of the applicability; the applicability, however, is equivalent since fuel assembly movement can only occur in MODE 6. Qualification of irradiated fuel vice fuel is discussed in DOC L.1.	3.9.7 Applicability	3.9.10.1 Applicability

Table L – Less Restrictive Changes
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.1 L.1	CTS 3.9.1 ACTION states that when the boron concentration requirement is not met, initiate and continue boration at < 0 gpm of >12,950 ppm boric acid solution or its equivalent until K _{eff} is reduced to <0.95 or the boron concentration is restored to 11 2300 ppm, whichever is more restrictive. ITS 3.9.1 requires initiation of action to restore boron concentration to within limit. This changes the CTS by eliminating the specific requirements for the boric acid solution to be used to restore compliance with the LCO.	3.9.1 ACTIONS	3.9.1 Action	4
3.9.1 L.2	CTS 4.9.1.1 requires the LCO reactivity condition to be determined prior to removing or unbolting the reactor vessel head, and prior to withdrawal of any full length control rod located within the reactor pressure vessel, in excess of 3 feet from its fully inserted position. ITS 3.9.1 does not contain this Surveillance Requirement; SDM requirements set prior to entering MODE 6 and through meeting boron concentration requirements.	None	4.9.1.1	5
3.9.1 L.3	CTS 3.9.1 provides limits on the boron concentration of all filled portions of the Reactor Coolant System and the refueling canal. ITS 3.9.1 modifies this requirement with a Note which states, "Only applicable to the refueling canal and refueling cavity when connected to the RCS." This changes the CTS by eliminating the applicability of the boron concentration limits on the refueling canal and refueling cavity when those volumes are not connected to the RCS.	LCO 3.9.1 Note	3.9.1	2

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.2 L.1	Unit 1 CTS 3.1.1.3.2 states that when the primary grade water flow path isolation valves are not locked, sealed, or otherwise secured in the closed position in MODE 6, all operations involving positive reactivity changes or CORE ALTERATIONS must be suspended, and the valves must be locked, sealed, or secured in the closed position within 15 minutes. Unit 2 CTS 3.1.1.3.2 states that when the primary grade water flow path isolation valves are not locked, sealed, or otherwise secured in the closed position, all operations involving positive reactivity changes or CORE ALTERATIONS must be suspended, the isolation valves must be locked, sealed, or otherwise secured in the closed position within 15 minutes, and SHUTDOWN MARGIN must be verified greater than or equal to 1.77% Δk/k within 60 minutes. ITS 3.9.2 Actions state than when one or more valves are not secured in the closed position, CORE ALTERATIONS must be suspended immediately, the primary grade water flow paths must be isolated within 15 minutes and the boron concentration must be verified per SR 3.9.1.1 within 4 hours. This changes the Unit 1 and Unit 2 CTS by eliminating the requirement to suspend positive reactivity additions and changes the Unit 2 CTS by allowing 4 hours to determine the SHUTDOWN MARGIN. The addition of the SHUTDOWN MARGIN measurement to the Unit1 CTS is discussed in DOC M.1.	3.9.2 Actions	3.1.1.3.2	4
3.9.3 L.1	CTS 3.9.2 Action states that with less than two source range instrumentation channels OPERABLE, immediately suspend all operations involving positive reactivity changes. ITS 3.9.3 Action A.2 adds an allowance to this requirement, which states, “Suspend operations that would cause introduction into the RCS, coolant with boron concentration less than required to meet the boron concentration of LCO 3.9.1.” This allows positive reactivity changes provided they do not reduce the boron concentration below the refueling limit. This changes the CTS requirements by allowing a limited positive reactivity additions.	3.9.3, Action A.2	3.9.2 Action	4

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.3 L.2	CTS surveillance requirement 4.9.2 states that a CHANNEL FUNCTION TEST is required for the source range neutron flux monitors at least once per 7 days and within 8 hours prior to the initial start of CORE ALTERATIONS. ITS SRs do not require the performance of similar tests for the source range instruments. This changes the CTS by deleting the CHANNEL FUNCTIONAL TESTS every 7 days and within 8 hours of CORE ALTERATIONS.	None	4.9.2	5
3.9.3 L.3	CTS LCO 3.9.2 states that two source range neutron flux monitors shall be operating, each with continuous visual indication in the control room and one with audible indication in the containment. ITS LCO 3.9.3 states that two source range neutron flux monitors shall be OPERABLE. The movement of continuous visual indication in the control room is addressed by DOC LA.1. This changes the CTS by deleting the requirement for an audible indication in the containment from the source range neutron flux monitors.	LCO 3.9.3	LCO 3.9.2	1
3.9.4 L.1	CTS 3.9.4.c.1 states that one option for the status of a containment penetration is for it to be, "Closed by an isolation valve, blind flange, or manual valve." ITS 3.9.4.c.1 states that one option for the status of a containment penetration is, "Closed by a manual or automatic isolation valve, blind flange, or equivalent." As all isolation valves are either manual or automatic, the addition of this phrase to the CTS does not result in a change. This changes the CTS by eliminating the phrase "manual valve" and adding the option of having, "or equivalent," as the means of closing the penetration.	3.9.4.c.1	3.9.4.c.1	1

Change Category:
1 - Relaxation of LCO Requirements
2 - Relaxation of Applicability
3 - Relaxation of Completion Time
4 - Relaxation of Required Action
5 - Deletion of Surveillance Requirement
6 - Relaxation Of Surveillance Requirement Acceptance Criteria
7 - Relaxation Of Surveillance Frequency
8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.4 L.2	CTS 4.9.4 states that specified containment penetration surveillances shall be performed, “within 100 hours prior to the start of and at least once per 7 days during...” the specified conditions. ITS SR 3.9.4.1 do not include the, “within 100 hours prior to the start of” Frequency. ITS SR 3.0.1 states, “SRs shall be met during the MODES or other specified conditions in the Applicability for the individual LCOs, unless otherwise stated in the SR.” Therefore, under the ITS, the Surveillances must be met prior to the initiation of movement of recently irradiated fuel. This changes the CTS by eliminating the stipulation that the Surveillances be met within 100 hours prior to entering the MODE of Applicability.	SR 3.9.4.1	4.9.4	7
3.9.4 L.3	CTS 4.9.4 includes a surveillance Frequency of once per 7 days during specified times in the MODE of Applicability for testing Containment Purge and Exhaust System OPERABILITY. The ITS SR 3.9.4.2 Frequency for the same requirement is 18 months. This changes the CTS by changing the Surveillance Frequency from 7 days to 18 months.	SR 3.9.4.2	4.9.4	7
3.9.4 L.4	ITS LCO 3.9.4 Note states, “Penetration flow path(s) providing direct access from the containment atmosphere to the outside atmosphere may be unisolated under administrative controls.” CTS 3.9.4 does not include such an allowance. This changes the CTS by allowing containment penetration flow paths to be unisolated under administrative controls during movement of recently irradiated fuel assemblies.	LCO 3.9.5 Note	None	1

Change Category:
1 - Relaxation of LCO Requirements
2 - Relaxation of Applicability
3 - Relaxation of Completion Time
4 - Relaxation of Required Action
5 - Deletion of Surveillance Requirement
6 - Relaxation Of Surveillance Requirement Acceptance Criteria
7 - Relaxation Of Surveillance Frequency
8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.4 L.5	CTS 3.9.4 is applicable during CORE ALTERATIONS and movement of irradiated fuel assemblies within containment. ITS 3.9.4 is applicable during movement of recently irradiated fuel assemblies within containment. References to CORE ALTERATIONS in CTS 3.9.4 are eliminated in the Applicability, Action, and Surveillances. All references in CTS 3.9.4 to irradiated fuel are changed to "recently" irradiated fuel. This changes the CTS by eliminating requirements for containment closure during CORE ALTERATIONS and movement of fuel that is not recently irradiated.	3.9.4	3.9.4	2
3.9.4 L.6	CTS 3.9.4.c.2 requires open containment purge and exhaust valves to be capable of being closed by an OPERABLE automatic Containment Purge and Exhaust isolation valve. CTS Surveillance 4.9.4.b requires testing the Containment Purge and Exhaust isolation valves and system per the applicable portions of Specification 4.6.3.1.2 and 4.9.9. CTS Surveillance 4.6.3.1.2.c requires verifying every 18 months that on a Containment Purge and Exhaust isolation signal, each Purge and Exhaust valve actuates to its isolation position. ITS LCO 3.9.4.c.2 states that open containment purge and exhaust valves be capable of being closed by an OPERABLE isolation valve. ITS SR 3.9.4.2 requires verification that each required containment purge and exhaust valve actuates to the isolation position on manual initiation. This changes the CTS by eliminating the requirement that open containment purge and exhaust valves close automatically on a Containment Purge and Exhaust isolation signal.	LCO 3.9.4.c.2, SR 3.9.4.2	3.9.4.c.2, 3.9.4.b, 3.6.3.1.2.c	1
3.9.4 L.7	CTS 3.9.4.b, footnote *, part b.2, states that if both personnel airlock doors are open, there must be at least 23 feet of water above the top of irradiated fuel assemblies within the reactor pressure vessel during CORE ALTERATIONS excluding movement of fuel assemblies. The ITS does not have that restriction. This changes the CTS by eliminating the requirement on water level during CORE ALTERATIONS when both containment personnel airlock doors are open.	None	3.9.4.b, Footnote *, part b.2	1

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.4 L.8	CTS 3.9.4.b is modified by a footnote * and part a of footnote * states that both doors of the containment personnel airlock may be open provided one door is capable of being closed "and that an individual is designated to close the door." ITS LCO 3.9.4 allows both doors of the containment personnel airlock to be open provided one door is capable of being closed. This changes the CTS by eliminating the requirement that "an individual is designated to close the door."	LCO 3.9.4	3.9.4.b, Footnote *, part a	1
3.9.5 L.1	CTS 3.9.8.1 states, in part, that with less than one RHR loop in operation, close all containment penetrations providing direct access from the containment atmosphere to the outside atmosphere within 4 hours. ITS 3.9.5 states that with the RHR loop requirements not met, within 4 hours secure the equipment hatch with at least four bolts, close one door in each installed air lock, and close each penetration providing direct access from the containment atmosphere to the outside atmosphere with a manual or automatic isolation valve, blind flange, or equivalent, or verify each penetration is capable of being closed by an OPERABLE Containment Purge and Exhaust Isolation System. This changes the CTS Actions by allowing penetrations capable of being closed by an OPERABLE Containment Purge and Exhaust Isolation System to remain open when the RHR requirements are not met.	3.9.5	3.9.8.1	4
3.9.5 L.2	CTS 4.9.8.1.2 states that an RHR loop must be verified to be in operation and providing the required flow at least once per 4 hours. ITS SR 3.9.5.1 requires verification that one RHR loop is operating and providing the required flow every 12 hours. This changes the CTS by reducing the Frequency for performing this Surveillance from 4 to 12 hours.	SR 3.9.5.1	4.9.8.1.2	7
3.9.5 L.3	CTS Surveillance 4.9.8.1.1 requires inservice testing of each RHR loop per Specification 4.0.5. ITS 3.9.5 does not contain this Surveillance, since the inservice test is not required to confirm operability. In addition, inservice testing is required by 10 CFR 50.55a, and a redundant TS requirement is not necessary.	None	4.9.8.1.1	5

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.5 L.4	CTS 3.9.8.1 states, in part, that with less than one RHR loop in operation, suspend all operations involving a reduction in boron concentration of the Reactor Coolant System. ITS 3.9.5, Action A.1, states that with the RHR loop requirements not met, suspend operations that would cause introduction into the RCS, coolant with boron concentration less than required to meet the boron concentration of LCO 3.9.1. This changes the CTS by allowing coolant with boron concentration less than the RCS boron concentration, but greater than the boron concentration limit in LCO 3.9.1, to be added to the RCS when the RHR requirements are not met.	3.9.5, Action A.1	3.9.8.1	4
3.9.6 L.1	CTS 3.9.8.2 states, in part, that with less than one RHR loop in operation, close all containment penetrations providing direct access from the containment atmosphere to the outside atmosphere within 4 hours. ITS 3.9.6 states that with no RHR loop in operation, within 4 hours secure the equipment hatch cover with at least four bolts, close one door in each installed air lock, and close each penetration providing direct access from the containment atmosphere to the outside atmosphere with a manual or automatic isolation valve, blind flange, or equivalent, or verify each penetration is capable of being closed by an OPERABLE Containment Purge and Exhaust Isolation System. This changes the CTS Actions by allowing penetrations capable of being closed by an OPERABLE Containment Purge and Exhaust Isolation System to remain open when no RHR loop is in operation.	3.9.6 ACTIONS	3.9.8.2	4
3.9.6 L.2	CTS 4.9.8.2.2 states that an RHR loop must be verified to be in operation and providing the required flow at least once per 4 hours. ITS SR 3.9.6.1 requires verification that one RHR loop is operating and providing the required flow every 12 hours. This changes the CTS by reducing the Frequency for performing this Surveillance from 4 to 12 hours.	SR 3.9.6.1	4.9.8.2.2	7
3.9.6 L.3	CTS Surveillance 4.9.8.2.1 requires verification that each RHR loop is OPERABLE per Specification 4.0.5. ITS 3.9.6 does not contain this Surveillance.	None	4.9.8.2.1	5

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.6 L.4	CTS 3.9.8.2 states, in part, that with less than one RHR loop in operation, suspend all operations involving a reduction in boron concentration of the Reactor Coolant System. ITS 3.9.6, Action B.1, states that with the RHR loop requirements not met, suspend operations that would cause introduction into the RCS, coolant with boron concentration less than required to meet the boron concentration of LCO 3.9.1. This changes the CTS by allowing coolant with boron concentration less than the RCS boron concentration, but greater than the boron concentration limit in LCO 3.9.1, to be added to the RCS when the RHR requirements are not met.	3.9.6, Action B.1	3.9.8.2	4
3.9.6 L.5	ITS 3.9.6 is modified by two LCO Notes. Note 1 allows all RHR pumps to be removed from operation for ≤ 15 minutes when switching from one train to another, provided several conditions are met. Note 2 allows one required RHR loop to be inoperable for up to 2 hours for Surveillance testing, provided that the other loop is OPERABLE and in operation. CTS 3.9.8.2 does not contain these allowances. This changes the CTS by providing allowing the LCO to not be met.	LCO 3.9.6 Notes	None	1
3.9.7 L.1	CTS 3.9.10.1 states that at least 23 feet of water must be maintained over the reactor pressure vessel flange in MODE 6 during movement of fuel assemblies within the containment. The 3.9.10.1 Action requires suspension of movement of fuel assemblies if the water level requirement is not met. ITS 3.9.7 states the refueling cavity water level shall be maintained ≥ 23 feet above the top of the reactor vessel flange during movement of irradiated fuel assemblies within containment. ITS 3.9.7, Action A.2, requires the suspension of movement o irradiated fuel assemblies within containment. This changes the CTS restricting the applicability and Actions from movement of any fuel assemblies within containment to movement of irradiated fuel within containment. The change eliminating MODE 6 is discussed in DOC A.3.	LCO 3.9.7	3.9.10.1	2

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table L – Less Restrictive Changes
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.7 L.2	CTS 4.9.10.1 requires the refueling cavity water level to be determined to be within limit within 2 hours prior to the start of and at least once per 24 hours during movement of fuel assemblies. ITS SR 3.7.9.1 requires verification that the refueling cavity water level is within limit every 24 hours. This changes the CTS by reducing the Frequency for verifying refueling cavity water level from 2 hours before fuel movement to 24 hours before fuel movement.	SR 3.7.9.1	4.9.10.1	7

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Table M – More Restrictive Changes
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Changes	ITS Requirement	CTS Requirement
3.9.1None	N/A	N/A	N/A
3.9.2 M.1	Unit 1 CTS 3.1.1.3.2 states that when the primary grade water flow path isolation valves are not locked, sealed, or otherwise secured in the closed position in MODE 6, all operations involving positive reactivity changes or CORE ALTERATIONS must be suspended, and the valves must be locked, sealed, or secured in the closed position within 15 minutes. Unit 2 CTS 3.1.1.3.2 states that when the primary grade water flow path isolation valves are not locked, sealed, or otherwise secured in the closed position, all operations involving positive reactivity changes or CORE ALTERATIONS must be suspended, the isolation valves must be locked, sealed, or otherwise secured in the closed position within 15 minutes, and SHUTDOWN MARGIN must be verified greater than or equal to 1.77% Δk/k within 60 minutes. ITS 3.9.2 Actions state that when one or more valves are not secured in the closed position, CORE ALTERATIONS must be suspended immediately, the primary grade water flow paths must be isolated within 15 minutes and the boron concentration must be verified per SR 3.9.1.1 within 4 hours. ITS 3.9.2, Condition A, is modified by a Note requiring that Required Action A.3, the SHUTDOWN MARGIN verification, be performed whenever Condition A is entered. This changes the Unit 1 CTS by adding a requirement to verify the RCS boron concentration within 4 hours and by changing the shutdown margin requirement from 1.77%Δk/k to a reference to SR 3.9.1.1 and changes the Unit 1 and Unit 2 CTS by adding a Note requiring performance of the SHUTDOWN MARGIN determination whenever a primary grade water flow path isolation valve is inadvertently opened.	3.9.2 ACTIONS	3.1.1.3.2
3.9.3 M.1	CTS LCO 3.9.2 Action requires with less than two source range channels OPERABLE, immediate suspension of all operations involving CORE ALTERATIONS or positive reactivity changes. Unit 2 CTS in LCO 3.9.2 requires that if both monitors are inoperable, the RCS boron concentration be verified every 12 hours. ITS 3.9.3 Action A requires with one source range neutron flux monitor inoperable, CORE ALTERATIONS and reactivity changes shall be suspended immediately, “that would cause introduction into the RCS, coolant with boron concentration less than required to meet the boron concentration of LCO 3.9.1.” ITS Action B states with two source range neutron flux monitors inoperable, initiate action immediately to restore one to OPERABLE and perform a verification of refueling boron concentration once per 12 hours. This changes the Unit 1 CTS requirements by requiring a verification of boron concentration every 12 hours when both source ranges are inoperable and the Unit 1 and Unit 2 CTS by requiring immediate initiation action to restore one source range to OPERABLE status.	3.9.3 Action A and B	LCO 3.9.2
3.9.3 M.2	CTS Surveillance Requirement 4.9.2 specifies testing for the source range instrumentation channels. ITS SR 3.9.3.2 requires the performance of a CHANNEL CALIBRATION to be performed on the source range monitors every 18 months. This changes the CTS by requiring a CHANNEL CALIBRATION every 18 months on each source range monitor.	SR 3.9.3.2	4.9.2

Table M – More Restrictive Changes
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Changes	ITS Requirement	CTS Requirement
3.9.3 M.3	Unit 1 CTS 4.9.2 requires a CHANNEL CHECK to be performed once per 12 hours during CORE ALTERATIONS. ITS SR 3.9.3.1 requires a CHANNEL CHECK to be performed every 12 hours. This changes the Unit 1 CTS by requiring the CHANNEL CHECK to be performed every 12 hours even if CORE ALTERATIONS are not in progress.	SR 3.9.3.1	4.9.2
3.9.3 M.4	CTS 3.9.2 states, in part, that, " two source range neutron flux monitors shall be operating." ITS 3.9.3 states, "Two source range neutron flux monitors shall be OPERABLE." This changes the CTS by requiring the source range neutron flux monitors to be OPERABLE, instead of just operating.	3.9.3	3.9.2
3.9.4None	N/A	N/A	N/A
3.9.5 M.1	CTS 3.9.8.1, Action c., states that the RHR loop may be removed from operation for up to 1 hour per 8 hour period during the performance of CORE ALTERATIONS in the vicinity of the reactor pressure vessel hot legs. ITS LCO 3.9.5 Notes states that the required RHR loop may be removed from operation for ≤ 1 hour per 8 hour period, provided no operations are permitted that would cause introduction into the Reactor Coolant System, coolant with boron concentration less than required to meet the minimum required boron concentration of LCO 3.9.1. This results in two changes to the CTS. First, the allowance to remove RHR from operation is no longer restricted to CORE ALTERATIONS in the vicinity of the reactor pressure vessel hot legs. Second, the use of the allowance in the ITS is predicated on prohibiting operations that will cause introduction into the RCS, coolant with a boron concentration less than required to meet the boron concentration of LCO 3.9.1.	LCO 3.9.5 Notes	3.9.8.1, Action c
3.9.5 M.2	CTS Surveillance 4.9.8.1.2 states that one RHR loop must be verified to be in operation and a. if the RCS temperature is > 140 °F or the time since entry into MODE 3 is < 100 hours, circulating reactor coolant at a flow rate ≥ 3000 gpm, or b. if the RCS temperature is ≤ 140 °F or the time since entry into MODE 3 is ≥ 100 hours, circulating reactor coolant at a flow rate ≥ 2000 gpm. ITS SR 3.9.5.1 requires verification that one RHR loop is in operation and circulating reactor coolant at a flow rate of ≥ 3000 gpm. This changes the CTS by eliminating the option to reduce RHR flow to 2000 gpm when RCS temperature is ≤ 140 °F or the time since entry into MODE 3 is < 100 hours.	SR 3.9.5.1	4.9.8.1.2
3.9.6 M.1	CTS 3.9.8.2 requires two independent RHR loops to be OPERABLE and at least one loop to be in operation. ITS SR 3.9.6.2 requires verification every seven days of correct breaker alignment and that indicated power is available to the RHR pump not in operation. A Note states that the Surveillance Requirement is not required to be performed until 24 hours after a required RHR pump is not in operation. This changes the CTS by adding a Surveillance Requirement.	SR 3.9.6.2	3.9.8.2
3.9.7 M.1	CTS 3.9.10.1 Action states that with the reactor vessel water level not within limit, suspend movement of fuel assemblies within the reactor pressure vessel. ITS 3.9.7 states with the refueling cavity water level not within limit, suspend movement of irradiated fuel assemblies within containment. This change	LCO 3.9.7	3.9.10.1

Table M – More Restrictive Changes
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Changes	ITS Requirement	CTS Requirement
	the CTS by expanding the suspension of movement of fuel assemblies from within the reactor pressure vessel to within the containment.		

Table R – Relocated Specifications and Removed Details
ITS Section 3.9 – Refueling Operations

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.9.1 LA.1	3.9.1	CTS 3.9.1 states that the boron concentration in MODE 6 shall be the more restrictive of a K_{eff} of 0.95 or a boron concentration of ≥ 2300 ppm. ITS LCO 3.9.1 states that the boron concentration shall be within the limit specified in the COLR. This changes the CTS by relocating the MODE 6 boron concentration limit to the Core Operating Limits Report (COLR).	COLR	ITS 5.6.5, Core Operating Limits Report	5
3.9.2 LA.1	Unit 2 3.1.1.3.2 Action	Unit 2 CTS 3.1.1.3.2 Action states that with the primary grade water flow path isolation valves not locked, sealed, or otherwise secured in the closed position, verify the SHUTDOWN MARGIN is greater than or equal to 1.77% $\Delta k/k$ within 60 minutes. ITS 3.9.2, Action A.4, states this requirement as, "Perform SR 3.9.1.1" within 1 hour. ITS SR 3.9.1.1 requires verification that the RCS boron concentration is within the limit provided in the COLR. This changes the CTS by moving the SHUTDOWN MARGIN value to the COLR.	COLR	ITS 5.6.5, Core Operating Limits Report	5
3.9.2 LA.2	3.1.1.3.2	Unit 1 CTS 3.1.1.3.2 states "The following valves shall be locked, sealed, or otherwise secured in the closed position except during planned boron dilution or makeup activities: a. 1-CH-217 or b. 1-CH-220, 1 CH-241, FCV 1114B and FCV-1113B." Unit 2 CTS 3.1.1.3.2 states "The following valves shall be locked, sealed, or otherwise secured in the closed position except during planned boron dilution or makeup activities: a. 2-CH-140 or b. 2-CH-160, 2 CH-156, FCV 2114B and FCV-2113B." ITS 3.9.2 states, "Primary grade water flow paths shall be isolated from the RCS." ITS 3.9.2 LCO Note states, "Primary grade water flow path isolation valves may be opened under administrative control for	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.9 – Refueling Operations

		planned boron dilution or makeup activities.” This changes the CTS by relocating the list of primary grade water flow path isolation valves to the ITS Bases. The other changes in CTS 3.1.1.3.2 are discussed in DOC A.2.			
3.9.3 LA.1	LCO 3.9.2	CTS LCO 3.9.2 states that two source range neutron flux monitors shall be operating, each with continuous visual indication in the control room. ITS 3.9.3 LCO states that two source range neutron flux monitors shall be OPERABLE. This changes the CTS by moving the requirement that each channel has a continuous visual indication the control room and with one audible indication in the containment from the specification to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.9.4 None	N/A	N/A	N/A	N/A	N/A
3.9.5 None	N/A	N/A	N/A	N/A	N/A
3.9.6 None	N/A	N/A	N/A	N/A	N/A
3.9.7 R.1	3.9.10.2	CTS 3.9.10.2 states that the refueling cavity water level must be at least 23 feet above the fuel during MODE 6 during movement of control rods within the reactor pressure vessel. Movement of control rods is not an initiator of any UFSAR accident analysis. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R
CTS 3.9.3 R.1	3.9.3	CTS 3.9.3 states that the reactor must be subcritical for at least 150 hours prior to movement of irradiated fuel in the reactor pressure vessel. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R
CTS 3.9.5 R.1	3.9.5	CTS 3.9.5 states that direct communications shall be maintained between the control room and personnel at the	Technical Requirements	10 CFR 50.59	R

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.9 – Refueling Operations

		refueling station during CORE ALTERATIONS. This ensures that refueling station personnel can be promptly informed of significant changes in the facility status or core reactivity conditions during CORE ALTERATIONS. The prompt notification of the control room of a fuel handling accident is an assumption in the Fuel Handling Analysis. This prompt notification is used to ensure that the control room is isolated promptly and is necessary to meet the control room operator dose limits in General Design Criteria 19. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Manual		
CTS 3.9.9 R.1	3.9.9	CTS 3.9.9 states requirements for the containment purge and exhaust isolation system, which automatically closes the containment purge and exhaust isolation valves in MODE 6. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R
CTS 3.9.7 R.1	3.9.7	CTS 3.9.7 places restriction on movement of loads over irradiated assemblies in the spent fuel pit in excess of 2500 pounds. This represents the working load of the fuel assembly plus gripper. The LCO ensures that in the event this load is dropped the activity release will be limited to that contained in a single fuel assembly and any possible distortion of fuel in the storage racks will not result in a critical array. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R
CTS 3.9.6 R.1	3.9.6	CTS 3.9.6 states that the manipulator crane and auxiliary hoist shall be used for movement of control rods or fuel assemblies and shall be OPERABLE during movement of control rods or fuel assemblies within the reactor pressure vessel. This specification ensures that the lifting device on the Manipulator	Technical Requirements Manual	10 CFR 50.59	R

- Change Category:
- 1 - Removing Details of System Design and System Description, Including Design Limits
 - 2 - Removing Descriptions of System Operation
 - 3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
 - 4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
 - 5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 3.9 – Refueling Operations

		Crane has adequate capacity to lift the weight of a fuel assembly and a Rod Control Cluster Assembly, and that an automatic load limiting device is available to prevent damage to the fuel assembly during fuel movement. This specification also ensures that the auxiliary hoist on the Manipulator Crane has adequate capacity for latching and unlatching control rod drive shafts. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.			
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- Change Category:
- 1 - Removing Details of System Design and System Description, Including Design Limits
 - 2 - Removing Descriptions of System Operation
 - 3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
 - 4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
 - 5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table A – Administrative Changes
ITS Section 4.0 – Design Features

DOC No.	Description of Change	ITS Requirement	CTS Requirement
4.0 A.1	In the conversion of the Surry Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
4.0 A.2	CTS 5.6.1.3 contains requirements on storing new fuel for the first core dry in the spent fuel pool storage racks. This is no longer required and thus the ITS does not contain this information.	None	5.6.1.3
4.0 A.3	ITS 4.1 contains a description of the site location as an administrative addition. The CTS does not contain this information.	4.1	None

Table L – Less Restrictive Changes
ITS Section 4.0 – Design Features

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
4.0 L.1	CTS 5.6.2 states that the spent fuel pit is designed and shall be maintained to prevent inadvertent draining of the pool below elevation 288.83 feet Mean Sea Level, USGS datum. ITS 4.3.2 states, "The spent fuel storage pool is designed and shall be maintained to prevent inadvertent draining of the pool below elevation 285 feet, 9 inches, Mean Sea Level, USGS datum." This changes the CTS by reducing the minimum design water level of the spent fuel pool from 288.83 feet to 285 feet, 9 inches.	4.3.2	5.6.2	Note 1

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Note 1 - The Less Restrictive changes for Chapter 4.0 did not fall into the categories used for the other Chapters. A specific Determination of No Significant Hazards Consideration was written for each Less Restrictive Change in Chapter 4.0.

Table M – More Restrictive Changes
ITS Section 4.0 – Design Features

DOC No.	Description of Changes	ITS Requirement	CTS Requirement
4.0 M.1	ITS 4.3.1.2.b states that the new fuel storage racks must be designed and maintained with the $K_{eff} \leq 0.90$ if fully flooded with unborated water. The CTS does not contain this information.	4.3.1.2.b	None

Table R – Relocated Specifications and Removed Details
ITS Section 4.0 – Design Features

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
4.0 LA.1	5.1	CTS 5.1 contains information on the site exclusion area, the low population zone, and unrestricted areas for radioactive gaseous and liquid effluents. CTS 5.1 includes Figure 5.1.1, Map Defining Unrestricted Areas for Radioactive Gaseous and Liquid Effluents, and Figure 5.1.2, Low Population Zone. The ITS does not contain this information. This changes the CTS by removing this information.	UFSAR	10 CFR 50.59	1
4.0 LA.2	5.2	CTS 5.2 describes the reactor containment building. The ITS does not contain this information. This changes the CTS by eliminating the description of the containment.	UFSAR	10 CFR 50.59	1
4.0 LA.3	5.3.1	CTS 5.3.1 contains details of fuel assembly design, such as number of fuel rods per fuel assembly, the fuel rod nominal active fuel length, and the initial core loading maximum enrichment. The ITS does not contain these details and, instead, provides a general statement which states, "Each assembly shall consist of a matrix of Zircaloy or ZIRLO fuel rods with an initial composition of natural or slightly enriched uranium dioxide (UO ₂) as fuel material." This changes the CTS by eliminating the detailed description of fuel assemblies.	UFSAR	10 CFR 50.59	1
4.0 LA.4	5.3.2	CTS 5.3.2 contains details of control rod design, such as the nominal length of absorber material, percentage of each absorber material, and control rod cladding material. The ITS does not contain these details and, instead, provides a general statement which states, "The control material shall be silver indium cadmium as approved by the NRC." This changes the CTS by eliminating the detailed description of control rod assemblies.	UFSAR	10 CFR 50.59	1

- Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table R – Relocated Specifications and Removed Details
ITS Section 4.0 – Design Features

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
4.0 LA.5	5.2	CTS 5.2 describes the reactor coolant system. The ITS does not contain this information. This changes the CTS by eliminating the description of the reactor coolant system.	UFSAR	10 CFR 50.59	1
4.0 LA.6	5.5	CTS 5.5 describes the location of the meteorological tower. The ITS does not contain this information. This changes the CTS by eliminating the location of the meteorological tower.	UFSAR	10 CFR 50.59	1

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table A – Administrative Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.0 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	Various	Various
5.0 A.2	CTS Table 6.2-1 states Shift Supervisor (SS), Senior Reactor Operator (SRO) and Reactor Operator (RO) manning requirements. The ITS does not include these manning requirements. This changes the CTS by not including manning requirements already required by 10 CFR 50.54(m)(2)(i).	None	Table 6.2-1
5.0 A.3	CTS 6.8.1.b requires written procedures be established, implemented and maintained covering refueling operations. CTS 6.8.1.c requires written procedures be established, implemented and maintained covering surveillance and test activities of safety related equipment. ITS 5.4.1.a requires written procedures shall be established, implemented and maintained to cover the applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978. This changes the CTS by deleting the specific wording of 6.8.1.b and 6.8.1.c, which is already addressed by Regulatory Guide 1.33, Revision 2, Appendix A, February 1978 and is committed to in CTS 6.8.1.a and ITS 5.4.1.a.	5.4.1.a	6.8.1.b and 6.8.1.c
5.0 A.4	CTS 6.8.1.d and CTS 6.8.1.e require written procedures be established, implemented, and maintained to address implementation of the Security Plan and the Emergency Plan. The ITS does not contain these requirements. This changes the CTS by deleting the specific reference to the Security Plan and the Emergency Plan because they are already required by 10 CFR 50.54(p) and 10 CFR 50.54(q), respectively.	None	6.8.1d and 6.8.1.e
5.0 A.5	ITS 5.5.10, Ventilation Filter Testing Program (VFTP), states, "A program shall be established to implement the following required testing of Engineered Safety Feature (ESF) filter ventilation systems at frequencies in general conformance with, and in accordance with Regulatory Positions C.5.a, C.5.c, C.5.d, and C.6.b of, Regulatory Guide 1.52, Revision 2, and ANSI N510-1975." CTS 4.7.7.1 (Control Room Emergency Ventilation System) and 4.7.8.1 (Safeguards Area Ventilation System) include requirements for ventilation filter testing in accordance with Regulatory Positions C.5.a, C.5.c, C.5.d, and C.6.b of Regulatory Guide 1.52, Revision 2, and ANSI N510-1975. This changes the CTS by consolidating existing ventilation requirements in a single program.	5.5.10	4.7.7.1 and 4.7.8.1
5.0 A.6	CTS Table 6.2-1 states, "During any absence of the Shift Supervisor from the Control Room while the unit is in MODE 5 or 6, and individual with a valid RO license...shall be designated to assume the Control Room command function." ITS 5.1.2 adds the option for a person with an active SRO license to assume the Control Room command function. This changes the CTS by clarifying that an SRO may also assume the Control Room command function.	5.1.2	Table 6.2-1

Table A – Administrative Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.0 A.7	ITS 5.5.8 states, “The provisions of SR 3.0.2 are applicable to the SG Tube Surveillance Program Test Frequencies.” CTS 3.4.5 does not include such a reference because CTS 4.0.2 already applies to CTS 3.4.5. This changes the CTS by adding an explicit reference to the ITS for an allowance provided without the reference in the CTS.	5.5.8	3.4.5
5.0 A.8	CTS 6.11, Radiation Protection Program, states, “Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.” The ITS does not include a requirement for a Radiation Protection Program. This changes the CTS by removing references to requirements already required by 10 CFR Part 20.	None	6.11
5.0 A.9	CTS 6.2.2.d states, “ALL CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.” ITS 5.2.2 does not contain this requirement. 10 CFR 50.54(m)(2)(iv) states, “Each licensee shall have present, during alteration of the core of a nuclear power unit (including fuel loading or transfer), a person holding a senior operator license or a senior operator license limited to fuel handling to directly supervise the activity and, during this time, the licensee shall not assign other duties to this person.” This changes the CTS 6.2.2.d by deleting this information because it is already a requirement in accordance with 10 CFR 50.54 (m)(2)(iv).	None	6.2.2.d
5.0 A.10	CTS 4.6.1.1, CTS 4.6.1.2, CTS 3.6.1.3, and CTS 4.6.1.3 specify the leakage rate requirements for Containment Integrity and the Containment Air Locks. ITS 5.5.15, Containment Leakage Rate Testing Program, specifies the leakage rate requirements for the Containment and Containment Air Locks within the Containment Leakage Rate Testing Program. This changes the CTS by moving the leakage rate acceptance criteria for Containment Integrity and Containment Air Locks in the CTS to ITS 5.5.15, “Containment Leakage Rate Testing Program.”	5.5.15	4.6.1.1, 4.6.1.2, 3.6.1.3 and 4.6.1.3
5.0 A.11	CTS 6.15 states, “Changes to the ODCM: a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.2.r.” ITS 5.5.1 states, “Licensee initiated changes to the ODCM: a. Shall be documented and records of reviews performed shall be retained.” This changes the CTS by not including a reference to how the records are to be retained.	5.5.1	6.15
5.0 A.12	CTS Table 6.2-1 lists acronym definitions for shift manning. These acronyms are defined as appropriate in parts of ITS 5.0, and the ITS does not include a consolidated list. This changes the CTS by deleting the consolidated acronym list and defining them as needed in ITS 5.0.	5.0	Table 6.2-1

Table A – Administrative Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.0 A.13	CTS 4.0.5.b does not specify a biennial or every 2 years frequency of “at least once per 731 days.” ITS 5.5.7 includes a biennial or every 2 years frequency of “at least once per 731 days.” This changes the CTS 4.0.5 by incorporating the ASME Boiler and Pressure Vessel Code biennial or every 2 years frequency of “at least once per 731 days.”	5.5.7	4.0.5.b
5.0 A.14	CTS 6.9.1.7.d requires the COLR to be provided to the, “NRC Document Control Desk with copies to the Regional Administrator and Resident Inspector.” CTS 6.9.1.6 requires the Monthly Operating Report be submitted to, “the Director of Management and Program Analysis, U.S. Nuclear Regulatory Commission, Washington, D. C. 20555, with a copy to the Regional Office of Inspection and Enforcement.” ITS 5.6.5.d requires the COLR be provided to the NRC. ITS 5.6.4 requires the Monthly Operating Report be submitted. This changes the CTS by removing the specifics regarding distribution of the reports to the NRC, which is addressed by 10 CFR 50.4.	5.6.5.d, 5.6.4	6.9.1.6 and 6.9.1.7.d
5.0 A.15	Unit 1 CTS Table 4.4-2, Steam Generator Tube Inspection, 2 nd Sample Inspection, Additional SG is C-3, Action Required includes, “Report to NRC...” Unit 2 CTS Table 4.19-2, Steam Generator Tube Inspection, 1 st Sample Inspection, C-3 result, and 2 nd Sample Inspection, Additional SG is C-3, Action Required includes, “Special Report.” ITS Table 5.5.8-2 does not include a statement requiring prompt NRC notification. ITS 5.6.7.c states, “Results of steam generator tube inspections that fall into Category C-3 require prompt notification of the Commission pursuant to Section 50.72 to 10 CFR Part 50. A Licensee Event Report shall be submitted pursuant to Section 50.73 to 10 CFR Part 50 and shall provide a description of investigations conducted to determine cause of the tube degradation and corrective measures taken to prevent recurrence.” This changes the CTS by removing a reporting reference that is required by other sections of the Technical Specifications.	5.6.7.c	Unit 1-Table 4.4-2, Unit 2-Table 4.9-12
5.0 A.16	CTS 4.6.1.2 and CTS 4.6.1.3 regarding the containment and containment penetrations, and each containment air lock, respectively, state they shall, “...be tested by performing leakage rate testing as required by 10 CFR 50, Appendix J, Option B, as modified by approved exemptions, and in accordance with the guidelines contained in Regulatory Guide 1.163, dated September 1995. The provisions of Specification 4.0.2 are not applicable.” ITS 5.5.15, Containment Leakage Rate Testing Program, does not include the statement that the provisions of Specification 4.0.2 are not applicable, but states, “Nothing in these Technical Specifications shall be construed to modify the testing Frequencies required by 10 CFR 50, Appendix J.” This changes the CTS by removing a statement that part of Section 3.0 does not apply to this testing requirement which is being moved to Section 5.0 because Section 3.0 is understood to not apply to Section 5.0.	None	4.6.1.2 and 4.6.1.3

Table A – Administrative Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.0 A.17	ITS 5.7.2.a.2 states, in reference to entryways to high radiation areas with dose rates greater than 1.0 rem/hour at 30 centimeters from the radiation source or from any Surface Penetrated by the Radiation, "Doors and gates shall remain locked except during periods of personnel or equipment entry or exit." The CTS does not include such a statement. This changes the CTS by adding a clarification that the door and gate barriers may be opened for entry and exit.	5.7.2.a.2	None
5.0 A.18	ITS 5.5.11 states, "The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Explosive Gas and Storage Tank Radioactivity Monitoring Program surveillance Frequencies." CTS 3.11.1 and CTS 3.11.2 did not include such requirements because CTS 4.0.2 and 4.0.3, which are equal to ITS SR 3.0.2 and SR 3.0.3, already apply to CTS 3.11.1 and CTS 3.11.2. This changes the CTS by adding a reference for an allowance because it must be stated that the existing allowance applies for testing in Section 5.0.	5.5.11	3.11.1 and 3.11.2
5.0 A.19	CTS 6.6.1 states, "The following actions shall be taken for REPORTABLE EVENTS: A. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and..." ITS 5.0 does not include these requirements. This changes the CTS by deleting requirements already required by 10 CFR 50.73.	None	6.6.1
5.0 A.20	CTS 1.17, 4.0.5.c, 4.4.5.1, 4.4.5.2, 4.4.5.3, 4.4.5.4, 6.9.1.5.b, and 6.12.2 include references to other CTS requirements. The ITS modifies these to ITS references or appropriate requirements. This changes the CTS by making appropriate references in the ITS.	Various	1.17, 4.0.5.c, 4.4.5.1, 4.4.5.2, 4.4.5.3, 4.4.5.4, 6.9.1.5.b, and 6.12.2
5.0 A.21	CTS 4.0.5.a states, "Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i). CTS 4.0.5 and CTS 4.0.5.c reference inservice inspection requirements for ASME Code Class 1, 2, and 3 components. ITS 5.5.7 does not include the statement in CTS 4.0.5.a and does not include references to inservice inspection. This changes the CTS by not including a reference to 10 CFR 50.55a requirements or references to ASME Code Class 1, 2, and 3 inservice inspection. The 10 CFR 50.55a requirements are still applicable without the reference, and inservice inspection is understood to be part of ASME Code Class 1, 2, and 3 inservice testing.	None	4.0.5
5.0 A.22	CTS 4.4.10.1.1 states, "In addition to the requirements of Specification 4.0.5, the Reactor Coolant pump flywheels shall be inspected..." ITS 5.5.6 does not include the reference to Specification 4.0.5, which is ITS 5.5.7, Inservice Testing Program. This changes the CTS by not referencing CTS 4.0.5 requirements which are required regardless of the reference.	None	4.4.10.1

Table A – Administrative Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.0 A.23	ITS 5.5.10 states, “The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP test frequencies.” CTS 4.7.7 and CTS 4.7.8 do not explicitly state these allowances, but they apply as CTS 4.0.2 and CTS 4.0.3, which are equal to ITS SR 3.0.2 and SR 3.0.3, because these allowances apply to all the CTS LCO Surveillance Requirements. This changes the CTS by explicitly invoking the allowances of ITS SR 3.0.2 and ITS SR 3.0.3 because the requirements have been moved to Section 5.0, and an explicit allowance is needed to retain the existing allowances.	5.5.10	4.7.7. and 4.7.8
5.0 A.24	CTS 6.9.1 states, “In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Director of the Regional Office of Inspection and Enforcement unless otherwise noted.” ITS 5.6 states, “The following reports shall be submitted in accordance with 10 CFR 50.4.” This changes the CTS by referencing 10 CFR 50.4 as the reference for how to submit reports and excluding the remaining detail, which is already addressed in 10 CFR 50.4.	None	6.9.1
5.0 A.25	CTS 6.9.1.4 regarding annual reports states, “The initial report shall be submitted prior to March 1 of the year following initial criticality.” The ITS does not include such a statement. This changes the CTS by deleting a requirement for report submissions that have already occurred and will not be repeated.	None	6.9.1.4
5.0 A.26	Not used.	N/A	N/A
5.0 A.27	CTS 6.9.1.7.e.2f, References for the Core Operating Limits Report, states, “WCAP-12610, “VANTAGE+FUEL ASSEMBLY REPORT,” June 1990 (<u>W</u> Proprietary).” ITS 5.6.5.b.7 states, “VANTAGE+FUEL ASSEMBLY-REFERENCE CORE REPORT.” This changes the CTS by correcting the reference to the title of WCAP-12610. Regarding deletion of, “June 1990 (<u>W</u> Proprietary),” see DOC LA.9.	5.6.5.b.7	6.9.1.7.e.2f
5.0 A.28	CTS 6.2.4.1 states, “The Shift Technical Advisor shall serve in an advisory capacity to Shift Supervisor on matters...” CTS 6.3.1.2 states, “Incumbents in the positions of Shift Supervisor, Assistant Shift Supervisor (SRO), Control Room Operator – Nuclear (RO), and Shift Technical Advisor, shall meet or exceed the requirements of 10 CFR 55.59(c) and 55.31(a)(4).” ITS 5.2.2.f states, “An individual shall provide advisory technical support to the unit operations shift crew...” ITS 5.3.1 states, “The SS, Assistant SS, Control Room Operator – Nuclear, and individual providing advisory technical support to the unit operations shift crew, shall meet or exceed the requirements of 10 CFR 55.59(c) and 55.31(a)(4).” This changes the CTS by removing the Shift Technical Advisor title, and replacing the term Shift Supervisor with unit operations shift crew, though the requirement for the person with the specified responsibility remains the same.	5.2.2.f and 5.3.1	6.2.4.1 and 6.3.1.2

Table A – Administrative Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.0 A.29	ITS 5.3.2 states, “For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and a licensed Reactor Operator (RO) are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m).” The CTS does not include such a statement. This changes the CTS by clarifying the relation between individuals referenced in 10 CFR 55.4, ITS 5.3.1, and 10 CFR 50.54(m).	5.3.2	None
5.0 A.30	CTS 6.8.4.e.2 states that the program provided conforming with 10 CFR 50.36a includes, “Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to ten times 10 CFR Part 20 Appendix B, Table 2, Column 2.” ITS 5.5.4.b references 10 CFR 20.1001-20.2402. This changes the CTS by referencing the specific portion of 10 CFR Part 20 that includes the referenced requirement.	5.5.4.b	6.8.4.e.2
5.0 A.31	CTS 6.12.1 applies for control of entry into high radiation areas in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr. CTS 6.12.2 applies for control of entry into high radiation areas in which the intensity of radiation is greater than 1000 mrem/hr, but less than 500 rads/hr at one meter from a radiation source or any surface through which radiation penetrates. ITS 5.7.1 applies to controls for high radiation areas with dose rates not exceeding 1.0 rem/hour at 30 centimeters from the radiation source or from any Surface Penetrated by the Radiation. ITS 5.7.2 applies to controls for high radiation areas with dose rates greater than 1.0 rem/hour at 30 centimeters from the radiation source or from any Surface Penetrated by the Radiation, but less than 500 rads/hr at one meter from a radiation source or any surface through which radiation penetrates. This changes the CTS by deleting the reference to a high radiation area having radiation intensity in excess of 100 mrem/hr, and adds the criteria of, “at 30 centimeters from the radiation source or from any Surface Penetrated by the Radiation” to the parameter 1000 mrem/hr.	5.7.1 and 5.7.2	6.12.1 and 6.12.2
5.0 A.32	CTS 4.0.5.d states, “Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements.” The ITS does not include an equivalent requirement. This changes the CTS by not explicitly stating that the inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements.	None	4.0.5.d
5.0 A.33	CTS 6.9.2 requires special reports be submitted to the Regional Administrator, Region II, within time periods specified, and lists the CTS Specifications that require special reports to be submitted. The ITS does not require special reports to be prepared and submitted. This changes the CTS by deleting the references to the CTS Specifications requiring special reports be generated. Justification for disposition of each of the special report requirements is addressed by the ITS package for each respective CTS Specification.	None	6.9.2

Table A – Administrative Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.0 A.34	CTS 6.2.2.b states, “At least one licensed Reactor Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in MODES 1, 2, 3 or 4, at least one licensed Senior Reactor Operator shall be in the Control Room.” The ITS does not include this phrase. This changes the CTS by deleting two requirements, both of which are addressed by 10 CFR 50.54.	None	6.2.2.b
5.0 A.35	CTS 6.8.4.c(v) states that the secondary water chemistry monitoring program shall include, “Procedures defining corrective actions for all control point chemistry conditions.” ITS 5.5.9.e states that the secondary water chemistry monitoring program shall include, “Procedures defining corrective actions for all off control point chemistry conditions.” This changes the CTS by adding the word “off” to the term control point	5.5.9.e	6.8.4.c(v)
5.0 A.36	ITS 5.5.15.e states, “The provisions of SR 3.0.3 are applicable to the Containment Leakage Rate Testing Program.” The CTS do not contain such a statement. This changes the CTS by stating that SR 3.0.3 applies because in the CTS the allowance in CTS 4.0.2, which is the same as ITS SR 3.0.3, already applies.	5.5.15.e	4.0.2
5.0 A.37	CTS 6.9.1.7.a contains a list of the core operating limits established and documented in the Core Operating Limits Report (COLR). ITS 5.6.5.a includes additional core operating limits established and documented in the COLR. These are: Safety Limits, Shutdown Margin, Reactor Trip System Instrumentation – OTΔT and OPΔT Trip Parameters, RCS Pressure, Temperature, and Flow DNB Limits, and Boron Concentration. These limits had previously been addressed in other parts of the CTS, but are being moved to the COLR, and because of this are listed in ITS 5.6.5.a. The change also deletes references associating the core operating limits listed with other sections in the CTS. This changes CTS by adding core operating limits established and documented in the COLR because they are being moved there as part of changes to other parts of the CTS. Technical aspects of the changes are addressed by Discussions of Change for the respective individual specifications	5.6.5.a	6.9.1.7.a
5.0 A.38	ITS 5.5.8 includes an introductory paragraph that states, “This program provides the controls for the inservice inspection of steam generator tubes to ensure that the structural integrity of this portion of the RCS is maintained. The program for inservice inspection of steam generators is based on a modification of Regulatory Guide 1.83, Revision 1. This program shall include.” CTS does not include such an introduction. This changes CTS by adding an introductory paragraph for requirements that had not in the past been addressed as a separate program in the Technical Specifications.	5.5.8	None

Table L – Less Restrictive Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.1	CTS Table 6.2-1 specifies that the shift crew may be one less than the minimum complement, except for the Shift Supervisor, for a period of time not to exceed 2 hours. CTS Table 6.2-1 also takes an exception that the provision for being less than minimum shift crew complement does not apply for any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent. ITS 5.2.2.b does not make these exceptions to the requirements of 10 CFR 50.54 (m)(2)(i). This changes the CTS by allowing shift crew composition to be less than the manning requirements without specifying exceptions to this allowance.	5.2.2.b	Table 6.2-1	Note 1
5.0 L.2	CTS 6.9.1.5.c states the contents of an annual report to be submitted to the Nuclear Regulatory Commission which contains the results of specific activity analyses in which the primary coolant exceeded the limits of the RCS Specific Activity Specification. ITS 5.6 does not contain any requirements for such an annual report. This changes the CTS by not including the requirements for the annual report of specific activity analyses in which the primary coolant exceeded the limits of the RCS Specific Activity Specification.	None	6.9.1.5.c	8
5.0 L.3	CTS 6.2.2 states, “The Facility organization shall be as shown in the UFSAR.” ITS 5.2.2 states, “The Facility organization shall include...” and describes the facility organization. This changes the CTS by deleting the requirement to have the description of the facility organization in the UFSAR.	None	6.2.2	Note 1

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Note 1 - Certain Less Restrictive changes for Chapter 5.0 did not fall into the categories used for the other Chapters. A specific Determination of No Significant Hazards Consideration was written for each non-categorized Less Restrictive Change in Chapter 5.0.

Table L – Less Restrictive Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.4	CTS 6.1.1 states, “The Site Vice President shall be responsible for overall facility operation. In his absence, the Manager - Station Operations and Maintenance shall be responsible for overall facility operation. During the absence of both, the Site Vice-President shall delegate in writing the succession to this responsibility.” ITS 5.1.1 states, “The plant manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.” This changes the CTS by not specifying the title of the person with responsibility for overall facility operation, and allowing the plant manager to delegate the responsibility to someone other than the Manager - Station Operations and Maintenance if that person is not absent	5.1.1	6.1.1	Note 1
5.0 L.5	CTS 6.1.2 states, “A management directive to this effect, signed by the Senior Vice President-Nuclear, shall be issued to all station personnel on an annual basis,” regarding delegation of the control room command function. ITS 5.1.2 does not include such a requirement. This changes the CTS by deleting the requirement to issue a management directive annually.	None	6.1.2	Note 1

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Note 1 - Certain Less Restrictive changes for Chapter 5.0 did not fall into the categories used for the other Chapters. A specific Determination of No Significant Hazards Consideration was written for each non-categorized Less Restrictive Change in Chapter 5.0.

Table L – Less Restrictive Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.6	CTS 6.2.1.b states, “The Site Vice President shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.” CTS 6.2.1.c states, “The Vice President – Nuclear Operations shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.” CTS 6.15 states, “Changes to the ODCM:... b. Shall become effective after...the approval of the Site Vice President.” CTS 6.3.1.3 states, “The Superintendent Operations shall hold...” CTS 6.3.1.1 states, “The Superintendent – Radiological Protection shall meet...” ITS 5.2.1.b substitutes “plant manager” for “Site Vice President,” ITS 5.2.1.c substitutes “A specified corporate officer” for “The Vice President – Nuclear Operations,” ITS 5.5.1.b substitutes “plant manager” for “Site Vice President,” ITS 5.2.2.e substitutes “operations manager” for “Superintendent Operations,” and ITS 5.3.1 substitutes “radiation protection manager” for “Superintendent – Radiological Protection.” This changes the CTS by using less specific designations for the positions with the respective responsibilities.	5.2.1.b, 5.2.1.c, 5.5.1.b, 5.2.2.e and 5.3.1	6.2.1.b, 6.2.1.c, 6.1.5, 6.3.1.1 and 6.3.1.3	Note 1
5.0 L.7	CTS 6.9.1.1, CTS 6.9.1.2 and CTS 6.9.1.3, “Startup Reports,” contains requirements for submitting a report following receipt of an operating license; installation of fuel that has a different design or has been manufactured by a different fuel supplier; modifications that may have altered the nuclear, thermal, or hydraulic performance of the unit; and amendments to the license involving planned increase in power operation. The ITS does not contain such reporting requirements. This changes the CTS by deleting the requirements of CTS 6.9.1.1, CTS 6.9.1.2 and CTS 6.9.1.3.	None	6.9.1.1, 6.9.1.2 and 6.9.1.3	8

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Note 1 - Certain Less Restrictive changes for Chapter 5.0 did not fall into the categories used for the other Chapters. A specific Determination of No Significant Hazards Consideration was written for each non-categorized Less Restrictive Change in Chapter 5.0.

Table L – Less Restrictive Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.8	CTS Table 6.2-1 includes requirements on SS, SRO, RO, AO, and STA position manning for each unit that are beyond what is required by 10 CFR 50.54(m)(2)(i). The ITS does not include these conditions. This changes the CTS by deleting certain criteria regarding how manning is distributed.	None	Table 6.2-1	Note 1
5.0 L.9	CTS Table 6.2-1 requires that, with either or both units in MODE 1, 2, 3, or 4, four Auxiliary Operators (AOs) be part of the staff manning, two AOs assigned to each unit. CTS Table 6.2-1 requires that, with both units in MODE 5 or 6 or Defueled, two AOs be part of staff manning, one AO assigned to each unit. ITS 5.2.2.a states, "An auxiliary operator shall be assigned to each reactor containing fuel and an additional auxiliary operator shall be assigned for each control room from which a reactor is operating in MODES 1, 2, 3, or 4." When one or two units are in MODES 1, 2, 3, or 4, this changes the CTS by only requiring one AO be assigned for each reactor containing fuel rather than two, and only requiring one additional AO be assigned for each control room from which a reactor is operating. With both units shutdown or defueled, this changes the CTS by only requiring one AO be assigned to each unit containing fuel, rather than one AO be assigned for each unit regardless of whether or not it contains fuel. Other changes to the AO requirements are addressed by DOC M.24.	5.2.2.a	Table 6.2-1	Note 1
5.0 L.10	CTS Table 6.2-1, with regard to work hour procedures, states, "In addition, procedures will provide for documentation of authorized deviations from these guidelines and that the documentation is available for NRC review." ITS 5.0 does not include such a requirement. This changes the CTS by deleting a requirement to have a procedure for documentation of authorized deviations from the work hour guidelines and to have the documentation available for NRC review.	None	Table 6.2-1	Note 1

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

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Table L – Less Restrictive Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.11	CTS 6.2.2.c references requirements for a health physics technician. CTS 6.12.1, footnote “*” describes a Health Physics technician allowance. CTS 6.12.2 references a responsibility of the Shift Supervisor on duty and/or the Plant Health Physicist. ITS 5.2.2.d references a radiation protection technician, and ITS 5.7.1 references Radiation Protection personnel, and ITS 5.7.2 references the radiation protection shift supervisor, radiation protection manager or his or her designee responsibilities, respectively. This changes the CTS by changing the titles of the personnel in the specified positions to more generic titles.	5.2.2.d, 5.7.1 and 5.7.2	6.2.2.c, 6.12.1 footnote “*”, and 6.12.2	Note 1
5.0 L.12	CTS 6.8.4 states that one of the programs to be established, implemented, and maintained is, “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.” ITS 5.5.2 requires that the program minimize the same leakage. This changes the CTS by requiring the program provide controls to minimize instead of reduce leakage.	5.5.2	6.8.4	Note 1
5.0 L.13	ITS 5.7.2.f states, “Such individual areas that are within a larger area where no enclosure exists for the purpose of locking and where no enclosure can reasonably be constructed around the individual area need not be controlled by a locked door or gate, nor continuously guarded, but shall be barricaded, conspicuously posted, and a clearly visible flashing light shall be activated at the area as a warning device.” CTS 6.12.2 does not include such an allowance. This changes the CTS by providing an additional method by which to control a high radiation area meeting the criteria of 5.7.2.	5.7.2.f	6.12.2	Note 1

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

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Table L – Less Restrictive Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.14	ITS 5.5.14 provides criteria for the Safety Function Determination Program (SFDP), as referenced in ITS LCO 3.0.6. This provides an exception to ITS LCO 3.0.2 when a supported system LCO is not met solely due to a support system LCO not being met, such that the Conditions and Required Actions associated with this supported system are not required to be entered and there has been no loss of safety function . The CTS do not include such an exception to CTS LCO 3.0.2. This changes the CTS by including the criteria for an exception to CTS LCO 3.0.2.	5.5.14	3.0.2	2
5.0 L.15	CTS 6.9.1.4 requires annual reports described in CTS 6.9.1.5 be submitted prior to March 1 of each year. ITS 5.6.1 requires the Occupational Radiation Exposure Report to be submitted by April 30 of each year. This changes the CTS by allowing an additional 2 months to submit the Occupational Radiation Exposure Report each year.	5.6.1	6.9.1.4 and 6.9.1.5	Note 1
5.0 L.16	CTS 6.12.1 states for high radiation areas, "...entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit." ITS 5.7.1.b and ITS 5.7.2.b state for high radiation areas, "Access to, and activities in, each such area shall be controlled by means of Radiation Work Permit (RWP) or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures." This changes the CTS by allowing an equivalent document to be used for access control. The addition of details required in the RWP is addressed by DOC M.4.	5.7.1.b and 5.7.2.b	6.12.1	Note 1

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

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Table L – Less Restrictive Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.17	Unit 1 CTS 6.12, High Radiation Area, footnote “*,” states, “Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.” ITS 5.7.1.c states, “Individuals qualified in radiation protection procedures and personnel continuously escorted by such individuals may be exempted from the requirement for an RWP or equivalent while performing their assigned duties provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.” This changes the Unit 1 CTS by allowing personnel not qualified in radiation protection procedures, but escorted by such qualified individuals to use the exemption from the requirement for an RWP or equivalent while performing their assigned duties. Changing the term “Health Physics” to “radiation protection” is addressed by DOC L.11. Allowing personnel to use the exemption for reasons other than radiation protection duties is addressed by DOC L.34.	5.7.1.c	6.12 footnote “*”	Note 1
5.0 L.18	CTS Table 6.2-1 states the qualifications for the person that assumes the control room command function during the absence of the Shift Supervisor, and excludes the STA as a person who can assume that function. ITS 5.1.2 does not include this exclusion of the STA. This changes the CTS by allowing an STA that holds a valid SRO license to assume the control room command function during the absence of the Shift Supervisor.	5.1.2	Table 6.2-1	Note 1

- Change Category:
1 - Relaxation of LCO Requirements
2 - Relaxation of Applicability
3 - Relaxation of Completion Time
4 - Relaxation of Required Action
5 - Deletion of Surveillance Requirement
6 - Relaxation Of Surveillance Requirement Acceptance Criteria
7 - Relaxation Of Surveillance Frequency
8 - Deletion of Reporting Requirements

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Table L – Less Restrictive Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.19	CTS 6.4.1 states, “The Manager – Nuclear Training is responsible for ensuring that retraining and replacement training programs for the licensed facility staff meet or exceed the requirements of 10 CFR 55.59(c) and 55.31(a)(4). Also, a retraining and replacement training program for non-licensed facility staff shall meet or exceed the recommendations of Section 5 of ANS 3.1 (12/79 Draft)*.” CTS 6.4.1 footnote “*” states, “Exceptions to this requirement are specified in VEPCO’s QA Topical Report, VEP-1, “Quality Assurance Program, Operational Phase.”” ITS 5.0 does not include these requirements. This changes the CTS by not specifying who is responsible for ensuring the requirements of 10 CFR 55.59(c) and 55.31(a)(4) are met, and not specifying requirements for non-licensed facility staff training.	None	6.4.1	Note 1
5.0 L.20	ITS 5.5.7.c states, “The provisions of SR 3.0.3 are applicable to inservice testing activities.” CTS does not include an equivalent statement. This changes the CTS by allowing 24 hours or up to the limit of the Frequency, whichever is less, to perform inservice testing if it is discovered that the inservice testing requirements were not performed, instead of declaring the component inoperable.	5.5.7.c	None	7
5.0 L.21	ITS 5.6.1 allows dose assignments to various duty functions to be estimated using, among other things, an electronic dosimeter. CTS 6.9.1.5 does not include this allowance. This changes the CTS by including an electronic dosimeter as one of the ways by which dose assignments to various duty functions may be estimated.	5.6.1	6.9.1.5	Note 1

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

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Table L – Less Restrictive Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.22	Unit 1 CTS 4.4.5 Table 4.4-1 states that if an additional steam generator is in category C-3, one Action Required is, "Report to NRC & obtain approval prior to operation." ITS Table 5.5.8-2 for the same condition states, "Report to NRC pursuant to 5.6.7.c." This changes the CTS by not requiring obtaining NRC approval prior to operation in the event an additional steam generator is found to be in the category C-3.	Table 5.5.8-2	Table 4.4-1	Note 1
5.0 L.23	CTS 6.12.2 states, regarding areas in which the intensity of radiation is greater than 1000 mrem/hr, but less than 500 rads/hr at one meter from a radiation source or any surface through which radiation penetrates, "In addition, locked doors shall be provided to prevent unauthorized entry into such areas..." ITS 5.7.2 states, "...areas with radiation levels ≥ 1000 mrem/hr shall be provided with locked or continuously guarded doors to prevent unauthorized entry." This changes the CTS by allowing the doors to be guarded as an option to locking them.	5.7.2	6.12.2	Note 1
5.0 L.24	CTS Table 6.2-1 states, "Procedures will be established to insure that NRC policy statement guidelines regarding work hours established for employees are followed." ITS 5.2.2.d states, "Administrative procedures shall be developed and implemented to limit working hours of personnel who perform safety related functions..." This changes the CTS by not referencing the NRC policy statement guidelines regarding work hours as the source of guidance for limiting work hours.	5.2.2.d	Table 6.2-1	Note 1

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

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Table L – Less Restrictive Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.25	CTS 6.8.4.a.5 requires, “Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days.” ITS 5.5.4 states, “The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluent Controls Program surveillance frequency.” CTS does not include this provision. This changes the CTS by permitting a 25% extension of the interval specified in the Frequency.	5.5.4	6.8.4.a.5	7
5.0 L.26	CTS 6.9.1.6 states, “Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the Reactor Coolant System PORVs or safety valves, shall be submitted on a monthly basis...” ITS 5.6.4 states, “Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis...” This changes the CTS by deleting the requirement to include documentation of all challenges to the Reactor Coolant System PORVs or safety valves in the monthly report.	5.6.4	6.9.1.6	8

Change Category:

- 1 - Relaxation of LCO Requirements
- 2 - Relaxation of Applicability
- 3 - Relaxation of Completion Time
- 4 - Relaxation of Required Action
- 5 - Deletion of Surveillance Requirement
- 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
- 7 - Relaxation Of Surveillance Frequency
- 8 - Deletion of Reporting Requirements

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Table L – Less Restrictive Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.27	ITS 5.7.1.d.3 states that one of the options for devices an individual or group shall possess for radiation monitoring when entering a high radiation area with a dose rate not exceeding 1.0 rem/hour at 30 centimeters from the radiation source or from any surface penetrated by the radiation is, “A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area.” ITS 5.7.2.d.2 states that one of the options for devices an individual or group shall possess when entering a high radiation area with a dose rate exceeding 1.0 rem/hour at 30 Centimeters from the radiation source or from any surface penetrated by the radiation, but less than 500 rads/hour at 1 meter from the radiation source or any surface penetrated by the radiation is, “A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area with the means to communicate with and control every individual in the area.” CTS 6.12.1 and 6.12.2 do not contain these options for an individual or group. This changes the CTS by providing an additional device an individual entering these high radiation areas must possess for radiation monitoring.	5.7.1.d.3 and 5.7.2.d.2	6.12.1 and 6.12.2	Note 1

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

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Table L – Less Restrictive Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.28	CTS 6.12.1.b states that one of the optional criteria that allow entry into a high radiation area is, “An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Health Physicist in the Radiation Work Permit.” ITS 5.7.1.d.4 states, ”A self reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and, (i) be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or (ii) be under the surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with individuals in the area who are covered by such surveillance.” ITS 5.7.2.d.3 reads the same as ITS 5.7.1.d.4, except the last phrase, “communicate with individuals in the area who are covered by such surveillance,” is replaced with the phrase, “communicate with and control every individual in the area.” This changes the CTS by deleting the discussion of positive controls over activities and performing radiation surveillances with a requirement for the monitoring device to have continuous dose rate displays and the responsibility to control dose rates in the area, and an option to perform the monitoring of personnel remotely using the specified equipment and processes.	5.7.1.d.4 and 5.7.2.d.3	6.12.1.b	Note 1

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

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Table L – Less Restrictive Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.29	ITS 5.7.2.d.4 states that one of the options for devices that an individual or group shall possess when entering a high radiation area with a dose rate exceeding 1.0 rem/hour at 30 Centimeters from the radiation source or from any surface penetrated by the radiation, but less than 500 rads/hour at 1 meter from the radiation source or any surface penetrated by the radiation is, “In those cases where options (2) and (3), above, are impractical or determined to be inconsistent with the "As Low As is Reasonably Achievable" principle, a radiation monitoring device that continuously displays radiation dose rates in the area.” CTS 6.12.1 and 6.12.2 do not contain these options for an individual or group. This changes the CTS by providing an additional option for devices an individual entering these high radiation areas must possess.	5.7.2.d.4	6.12.1 and 6.12.2	Note 1

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

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Table L – Less Restrictive Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L30	CTS 6.8.2 states, “Each new procedure of 6.8.1 above, except 6.8.1.d, 6.8.1.e, and 6.8.1.f shall be reviewed and approved by the SNSOC prior to implementation as set forth in administrative procedures. Procedures of 6.8.1.d, 6.8.1.e, and 6.8.1.f shall be reviewed and approved as set forth in the facility’s Security Plan, Emergency Plan, and section 6.5.1.6.m of the Technical Specifications, respectively.” CTS 6.8.1.d is Security Program implementation. CTS 6.8.1.e is Emergency Plan implementation. CTS 6.8.1.f is Fire Protection Program Implementation. CTS 6.8.3 states, “Procedure changes that require a safety evaluation shall also be reviewed and approved by SNSOC. All other changes shall be independently reviewed and approved as programmatically discussed in the Updated Final Safety Analysis Report.” ITS 5.0 does not include statements like those in CTS 6.8.2 and 6.8.3 regarding review and approval of procedures of CTS 6.8.1.d, 6.8.1.e, 6.8.1.f, and review and approval of changes as described in the UFSAR. This changes the CTS by not specifying how these procedures are reviewed and approved.	None	6.8.2 and 6.8.3	Note 1

- Change Category:
1 - Relaxation of LCO Requirements
2 - Relaxation of Applicability
3 - Relaxation of Completion Time
4 - Relaxation of Required Action
5 - Deletion of Surveillance Requirement
6 - Relaxation Of Surveillance Requirement Acceptance Criteria
7 - Relaxation Of Surveillance Frequency
8 - Deletion of Reporting Requirements

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Table L – Less Restrictive Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.31	CTS 6.8.4.e.5 states that the radioactive effluent control program shall include "Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days." ITS 5.5.4.e states that the radioactive effluent control program shall include "Determination of cumulative dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days. Determination of projected dose contributions from radioactive effluents in accordance with the methodology and parameters in the ODCM at least every 31 days." This changes the CTS by not requiring that a projection of the dose contribution for the current calendar quarter and the current calendar year be performed every 31 days.	5.5.4.e	6.8.4.e.5	Note 1
5.0 L.32	CTS 1.22 describes the Process Control Program (PCP). CTS 6.14 (Unit 1) and CTS 6.13 (Unit 2) specifies the change control for the PCP. CTS 6.8.1.g requires written procedures be established, implemented, and maintained to cover PCP implementation. The ITS does not specify requirements for the PCP. This changes the CTS by removing the requirements associated with the contents and maintenance of the PCP.	None	6.14 (Unit 1) and 6.13 (Unit 2)	Note 1
5.0 L.33	CTS 4.7.7.2.c states that the relative humidity at which the laboratory test samples of the charcoal adsorber are tested is 95%. ITS 5.5.10.c states that the relative humidity at which the laboratory test samples of the charcoal adsorber are tested is 70%. This changes the CTS by relaxing the criteria for the test of the charcoal adsorber to a 70% humidity level instead of 95%.	5.5.10.c	4.7.7.2.c	6

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

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Table L – Less Restrictive Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.34	Unit 1 CTS 6.12, High Radiation Area, footnote “*,” states, “Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.” Unit 2 CTS 6.12, High Radiation Area, footnote “*,” states, “Health Physics personnel or personnel escorted by Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.” ITS 5.7.1.c states, “Individuals qualified in radiation protection procedures and personnel continuously escorted by such individuals may be exempted from the requirement for an RWP or equivalent while performing their assigned duties provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.” This changes the CTS by allowing personnel to be exempt from the RWP issuance requirement for any duties, not just for radiation protection. Changing the term “Health Physics” to “radiation protection” is addressed by DOC L.11. For Unit 1, allowing personnel not qualified in radiation protection procedures, but escorted by such qualified individuals, to use the exemption from the requirement for an RWP or equivalent while performing their assigned duties is addressed by DOC L.17.	5.7.1.c	6.12 footnote “*”	Note 1

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Note 1 - Certain Less Restrictive changes for Chapter 5.0 did not fall into the categories used for the other Chapters. A specific Determination of No Significant Hazards Consideration was written for each non-categorized Less Restrictive Change in Chapter 5.0.

Table L – Less Restrictive Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.35	CTS 6.8.4.a states that the program addressing leakage from portions of systems outside containment shall include, “(ii) Integrated leak test requirements for each system at refueling cycle intervals or less.” ITS 5.5.2, Primary Coolant Sources Outside Containment, states that the program shall include, “b. Integrated leak test requirements for each system at least once per 18 months. The provisions of SR 3.0.2 are applicable.” This changes the CTS by changing the description of the frequency for the integrated leak test requirements to 18 months, and allowing the test to be performed within 1.25 times the 18 month interval. This interval could be longer or shorter than the “refueling interval” frequency.	5.5.2	6.8.4.a	7

- Change Category:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation Of Surveillance Frequency
 - 8 - Deletion of Reporting Requirements

Note 1 - Certain Less Restrictive changes for Chapter 5.0 did not fall into the categories used for the other Chapters. A specific Determination of No Significant Hazards Consideration was written for each non-categorized Less Restrictive Change in Chapter 5.0.

Table M – More Restrictive Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Changes	ITS Requirement	CTS Requirement
5.0 M.1	ITS 5.1.1 states, “The plant manager or his designee shall approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that affect nuclear safety.” The CTS does not include such a statement. This changes the CTS by adding a required action for the plant manager or his designee.	5.5.1	None
5.0 M.2	ITS 5.4.1 states, “Written procedures shall be established, implemented, and maintained covering the following activities:...b. The emergency operating procedures required to implement the requirements of NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33.” The CTS does not include this requirement. This changes the CTS by adopting a new requirement for emergency operating procedures.	5.4.1	None
5.0 M.3	ITS 5.4.1 states, “Written procedures shall be established, implemented, and maintained covering the following activities:...e. All programs specified in Specification 5.5.” The CTS does not include this requirement. This changes the CTS by adopting a new requirement for procedures to address programs described in ITS 5.5.	5.4.1	None
5.0 M.4	CTS 6.12.1 states, “...entrance [into a high radiation area] thereto shall be controlled by requiring issuance of a Radiation Work Permit.” ITS 5.7.1.b and 5.7.2.b state, “Access to, and activities in, each such area shall be controlled by means of Radiation Work Permit (RWP) or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.” This changes the CTS by specifying certain information is required to be in the RWP or equivalent. The addition of the option to use a means equivalent to the RWP is addressed in DOC L.16.	5.7.1.b and 5.7.2.b	6.12.1
5.0 M.5	The CTS does not contain a diesel fuel oil testing program that controls the requirements for testing and maintaining the properties of both new and stored fuel oil. ITS 5.5.12 establishes a diesel fuel oil testing program to implement required testing of both new and stored fuel oil. This changes the CTS requirements by adding the requirement for a diesel fuel oil testing program.	5.5.12	None
5.0 M.6	The CTS does not contain specific requirements for a Technical Specification Bases Control Program that controls changes to the Bases. ITS 5.5.13 specifies the programmatic controls for processing changes to the Bases of the ITS. This changes the CTS by adding the requirements for the Technical Specification Bases Control Program.	5.5.13	None
5.0 M.7	Regarding lines of authority, CTS 6.2.1.a states, “These requirements shall be documented in the UFSAR.” ITS 5.2.1.a states, “These requirements, including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the UFSAR/QA Plan.” This changes the CTS by specifying that the plant-specific titles are specified in the QA Plan, as well as the UFSAR.	5.2.1.a	6.2.1.a

Table M – More Restrictive Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Changes	ITS Requirement	CTS Requirement
5.0 M.8	The second paragraph of ITS 5.6.2 includes detail to be included in the Annual Radiological Environmental Operating Report. CTS 6.9.1.8 does not contain this level of detail. This changes the CTS by requiring additional detail be included in the Annual Radiological Environmental Operating Report.	5.6.2	6.9.1.8
5.0 M.9	ITS 5.6.6 requires a report be submitted within 14 days after entering Condition B of ITS 3.3.3, PAM Instrumentation. ITS 5.6.6 also states, “The report shall outline the cause of the inoperability and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.” The CTS do not include these requirements. This changes the CTS by requiring a report to be submitted within 14 days after entering Condition B of ITS 3.3.3 and specifying the contents of the report.	5.6.6	None
5.0 M.10	CTS 6.9.1.9, “Annual Radiological Effluent Release Report,” states, “A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station...” The ITS 5.6.3 Note replaces the word “should” with “shall.” This changes the CTS by clarifying that when a single submittal is made for a multiple unit station, sections common to all units are to be combined.	5.6.3	6.9.1.9
5.0 M.11	CTS 3.11.2.5, Explosive Gas Mixture, limits the concentration of oxygen allowed in the waste gas decay tanks. CTS 3.11.2.6, Gas Storage Tanks, limits the quantity of radioactivity contained in each gas storage tank. CTS 3.11.1.4 limits the quantity of radioactive material contained in each of the specified unprotected outdoor tanks. ITS 5.5.11, Explosive Gas and Storage Tank Radioactivity Monitoring Program, include limits on hydrogen in addition to oxygen in the waste gas decay tanks, and requires the program address requirements specified in ITS 5.5.11. This changes the CTS by requiring a new program and specifying certain requirements the program must meet. Changes moving Actions and Surveillance Requirements to the TRM are addressed by DOC LA.7.	5.5.11	3.11.2.5, 3.11.2.6 and 3.11.1.4
5.0 M.12	CTS 6.2.4.1 states, “The Shift Technical Advisor shall serve in an advisory capacity to Shift Supervisor on matters pertaining to the engineering aspects of assuring safe operation of the unit.” ITS 5.2.2.f states, “An individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.” This changes the CTS by adding more detail to technical areas for which the STA is to provide support, and states that the STA will meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.	5.2.2.f	6.2.4.1

Table M – More Restrictive Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Changes	ITS Requirement	CTS Requirement
5.0 M.13	Unit 2 CTS 6.12.1, High Radiation Area, “*,” states, “Health Physics personnel or personnel escorted by Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.” Unit 2 CTS 6.12.1 applies for control of entry into high radiation areas in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr. Unit 2 CTS 6.12.2 states that the requirements of 6.12.1 also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr, but less than 500 rads/hr at one meter from a radiation source or any surface through which radiation penetrates. ITS 5.7.2, whose applicability is the same as Unit 2 CTS 6.12.2, does not include this allowance. This changes the CTS by deleting the exemption from the RWP issuance requirement for entering the high radiation areas addressed by Unit 2 CTS 6.12.2.	5.7.2	6.12.1 and 6.12.2
5.0 M.14	CTS 6.9.1.5.a requires, “A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man-rem exposure according to work and job functions.” CTS 6.9.1.5.a also states, “In the aggregate, at least 80 percent of the total whole body dose received from external sources should be assigned to specific major work functions.” ITS 5.6.1 states, “A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrems and the associated deep dose equivalent (reported in person-rem) according to work and job functions.” ITS 5.6.1 also states, “In the aggregate, at least 80 percent of the total deep dose equivalent received from external sources should be assigned to specific major work functions.” This changes the CTS by changing dose and exposure terminology to the more precise deep dose equivalent terms. It also changes the CTS by clarifying that the personnel for whom reporting is done are those for whom monitoring was performed.	5.6.1	6.9.1.5.a

Table M – More Restrictive Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Changes	ITS Requirement	CTS Requirement
5.0 M.15	CTS 6.2.1.d states, “The management position responsible for training of the operating staff and the management position responsible for the quality assurance functions shall have sufficient organizational freedom including sufficient independence from cost and schedule when opposed to safety considerations.” CTS 6.2.1.e states, “The management position responsible for health physics shall have direct access to that onsite individual having responsibility for overall facility management. Health physics personnel shall have the authority to cease any work activity when worker safety is jeopardized or in the event of unnecessary personnel radiation exposures.” ITS 5.2.1.d states, “The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.” This changes the CTS by stating that specified individuals, not just a particular manager, have sufficient organizational freedom and sufficient independence from operating pressures to perform their work. Also, rather than having access to particular managers, or the authority to cease work for reasons specified in the Specifications, the individuals have sufficient freedom to perform their work.	5.2.1.d	6.2.1.d and 6.2.1.e
5.0 M.16	CTS 6.12.1.b states that one of the optional criteria that allows entry into a high radiation area is, “A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.” ITS 5.7.1.e and ITS 5.7.2.e state, “Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.” This changes the CTS by expanding the requirement to apply to all the options for conditions allowing entry into a high radiation area, and adding the criteria that, “These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.” The phrase, “Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals,” is addressed by DOC L.17.	5.7.1.e and 5.7.2.e	6.12.1.b
5.0 M.17	One option allowed by CTS 6.12.2 for personnel to enter a high radiation area with radiation intensity greater than 1000 mrem, but less than 500 rads/hr at one meter from a radiation source or any surface through which radiation penetrates, is to have, “A radiation monitoring device which continuously indicates the radiation dose rate in the area.” ITS 5.7.2 does not include this allowance. This changes the CTS by deleting one of the acceptable means for providing personnel radiation exposure information.	5.7.2	6.12.2

Table M – More Restrictive Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Changes	ITS Requirement	CTS Requirement
5.0 M.18	CTS Table 6.2-1 states, "Procedures will be established to insure that NRC policy statement guidelines regarding work hours established for employees are followed." ITS 5.2.2.d states, "Administrative procedures shall be developed and implemented to limit working hours of personnel who perform safety related functions (e.g., licensed Senior Reactor Operators (SROs), licensed Reactor Operators (ROs), health physicists, auxiliary operators, and key maintenance personnel). The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime. Any deviation from the above guidelines shall be authorized by the plant manager or the plant manager's designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned. Routine deviation from the working hour guidelines is not authorized." This changes the CTS by adding specific requirements for limiting work hours of personnel who perform safety related functions. The change not referencing the NRC policy statement guidelines regarding work hours is discussed in DOC L.24.	5.2.2.d	Table 6.2-1
5.0 M.19	As part of one option for equipment required to enter a high radiation area as specified in ITS 5.7.1.d.4 and 5.7.2.d.3, the specifications require, "A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and," one of two other criteria be met for entering a high radiation area. CTS 6.12.1.c does not include this requirement. This changes the CTS by adding an additional requirement for entering a high radiation area.	5.7.1.d.4 and 5.7.2.d.3	6.12.1.c
5.0 M.20	ITS 5.5.15.b states, "The containment design pressure is 45 psig." The CTS does not include such a statement. This changes the CTS by adding a design criterion to the Technical Specifications.	5.5.15.b	None
5.0 M.21	CTS 4.7.8.1 provides ventilation filter testing requirements for the safeguards area ventilation systems (SAVS). Each system is described as having one SAVS exhaust fan and one auxiliary building HEPA filter and charcoal adsorber assembly. ITS 5.5.10 provides ventilation filter testing requirements for the ECCS Pump Room Exhaust Air Cleanup System (PREACS) trains. Each ECCS PREACS train is described as having one safeguards area exhaust fan, one Auxiliary Building Central exhaust system fan, and respective filters, controls, and dampers. This changes CTS by adding additional equipment tested as part of the ventilation filter testing requirements, and changing the testing criteria accordingly, to conform to the system as described in NUREG-1431.	5.5.10	4.7.8.1

Table M – More Restrictive Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Changes	ITS Requirement	CTS Requirement
5.0 M.22	CTS 6.8.4.c, “Secondary Water Chemistry,” requires, “A program for monitoring of secondary water chemistry to inhibit steam generator tube degradation.” ITS 5.5.10, “Secondary Water Chemistry Program,” states, “This program provides controls for monitoring secondary water chemistry to inhibit SG tube degradation and low pressure turbine disc stress corrosion cracking.” This changes CTS by adding the fact that the Secondary Water Chemistry Program provides controls for monitoring secondary water chemistry to inhibit low pressure turbine disc stress corrosion cracking in addition to SG tube degradation.	5.5.10	6.8.4.c
5.0 M.23	Unit 1 CTS 6.12, High Radiation Area, footnote “*,” states, “Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.” Unit 2 CTS 6.12, High Radiation Area, footnote “*,” states, “Health Physics personnel or personnel escorted by Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.” ITS 5.7.1.c states, “Individuals qualified in radiation protection procedures and personnel continuously escorted by such individuals may be exempted from the requirement for an RWP or equivalent while performing their assigned duties provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.” ITS 5.7.2.c states, “Individuals qualified in radiation protection procedures may be exempted from the requirement for an RWP or equivalent while performing radiation surveys in such areas provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.” This changes the CTS by requiring that for personnel to be exempt from the RWP issuance requirement, they must be qualified in radiation protection procedures, or escorted by a qualified individual in high radiation areas. Changing the term “Health Physics” to “radiation protection” is addressed by DOC L.11.	5.7.1.c and 5.7.2.c	6.12 footnote “*”
5.0 M.24	CTS Table 6.2-1 requires that with both units in MODE 5 or 6 or defueled, two Auxiliary Operators (AOs) be part of the staff manning, one AO assigned to each unit.ITS 5.2.2.a states, “Two unit sites with both units shutdown or defueled require a total of three non-licensed operators for the two units.” This changes the CTS by requiring three AOs with both units shutdown or defueled. Other changes to the AO requirements are addressed by DOC L.9.	5.2.2.a	Table 6.2-1

Table R – Relocated Specifications and Removed Details
ITS Section 5.0 – Administrative Controls

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
5.0 LA.1	6.8.1.i	CTS 6.8.1.i requires written procedures be established, implemented and maintained covering, “Quality Assurance Program for effluent and environmental monitoring, using the guidance in Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975.” ITS 5.4.1.c does not include the Regulatory Guide references. This changes the CTS by moving the references to the Regulatory Guides to the UFSAR.	UFSAR	10 CFR 50.59	3
5.0 LA.2	5.7.1	CTS 5.7.1 states, “The components identified in Table 5.7-1 are designed and shall be maintained within the cyclic or transient limits of Table 5.7-1.” CTS Table 5.7-1 contains the limits for component cyclic or transient limits and designs cycle or transient limits. ITS 5.5.5 states, “The components identified in the UFSAR, Section 5.2, are designed and shall be maintained within the cyclic or transient design limits.” This changes the CTS by moving the limits specified in Table 5.7-1 to the UFSAR and calling them the cyclic or transient design limits.	UFSAR	10 CFR 50.59	1
5.0 LA.3	6.8.4.b	CTS 6.8.4.b, “In-Plant Radiation Monitoring,” describes a program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. ITS 5.0 does not require such a program. This change moves the requirements of CTS 6.8.4.b to the UFSAR.	UFSAR	10 CFR 50.59	Note 1

- Change Category:
- 1 - Removing Details of System Design and System Description, Including Design Limits
 - 2 - Removing Descriptions of System Operation
 - 3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
 - 4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
 - 5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Note 1 - Certain Relocated Specifications and Removed Details changes for Chapter 5.0 did not fall into the categories used for the other Chapters. A specific Determination of No Significant Hazards Consideration was written for each non-categorized change.

Table R – Relocated Specifications and Removed Details
ITS Section 5.0 – Administrative Controls

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
5.0 LA.4	6.2.3	CTS 6.2.3 specifies the function, composition, responsibility, and authority of the Station Nuclear Safety (SNS). ITS 5.2 does not contain this requirement. This changes the CTS by deleting the requirements of CTS 6.2.3 and relocating them to the QA Topical Report.	QA Topical Report	10 CFR 50.59	Note 1
5.0 LA.5	4.7.7.1 and 4.7.8.1	CTS 4.7.7.1 (Control Room Emergency Ventilation System) and 4.7.8.1 (Safeguards Area Ventilation System) specify the Surveillance Requirements and Frequencies for demonstrating OPERABILITY. ITS 5.5.10, "Ventilation Filter Testing Program (VFTP)" does not include some of the Surveillance Requirements and Frequencies specified in the CTS. This changes the CTS by moving these details to the VFTP.	VFTP	ITS 5.5.10, Ventilation Filter Testing Program (VFTP)	3
5.0 LA.6	6.5, 6.6.1.b, 6.8.2, 6.8.3, and 6.15.b	CTS 6.5, 6.6.1.b, 6.8.2, 6.8.3, and 6.15.b specify the function, composition, use of alternates, meeting frequency, quorum, responsibilities, authority, and records of the Station Nuclear Safety and Operating Committee (SNSOC) and the Management Safety Review Committee (MSRC). CTS 6.5 also specifies the use of consultants, reviews and audits for the MSRC. ITS 5.0 does not contain these requirements. This changes the CTS by relocating the requirements for the SNSOC and MSRC to the QA Topical Report.	QA Topical Report	10 CFR 50.59	Note 1

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Note 1 - Certain Relocated Specifications and Removed Details changes for Chapter 5.0 did not fall into the categories used for the other Chapters. A specific Determination of No Significant Hazards Consideration was written for each non-categorized change.

Table R – Relocated Specifications and Removed Details
ITS Section 5.0 – Administrative Controls

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
5.0 LA.7	3.11.1.4, 3.11.2.5 and 3.11.2.6	CTS 3.11.1.4, Liquid Holdup Tanks, imposes limits on the quantity of radioactive material contained in each tank. CTS 3.11.2.5, Explosive Gas Mixture, limits the oxygen concentration in the Waste Gas Decay Tanks to ensure that the concentration of potentially explosive gas mixtures in the Waste Gas Decay Tanks is maintained below the flammability limits for hydrogen and oxygen. CTS 3.11.2.6, Gas Storage Tanks, imposes limits on the quantity of radioactive material contained in each tank. ITS 5.5.11, "Explosive Gas and Storage Tank Radioactivity Monitoring Program," does not contain the specific requirements, Applicability, Actions, and Surveillance Requirements in CTS 3.11.1.4, CTS 3.11.2.5, and CTS 3.11.2.6. This changes the CTS by moving this information to the TRM.	Technical Requirements Manual	10 CFR 50.59	3
5.0 LA.8	6.8.4.g	CTS 6.8.4.g contains the requirements for the Configuration Risk Management Program. ITS 5.0 does not include requirements for the Configuration Risk Management Program. This changes the CTS by moving the requirements for the Configuration Risk Management Program to the UFSAR.	UFSAR	10 CFR 50.59	3
5.0 LA.9	6.9.1.7.e	CTS 6.9.1.7.e specifies the revisions and dates of the referenced methodologies, and the LCOs for which the referenced methodologies are used. ITS 5.6.5.b does not contain this level of detail. This changes the CTS by moving the specific methodology references for revisions, dates, and LCOs to the COLR.	COLR	ITS 5.6.5, Core Operating Limits Report	1

- Change Category:
- 1 - Removing Details of System Design and System Description, Including Design Limits
 - 2 - Removing Descriptions of System Operation
 - 3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
 - 4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
 - 5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Note 1 - Certain Relocated Specifications and Removed Details changes for Chapter 5.0 did not fall into the categories used for the other Chapters. A specific Determination of No Significant Hazards Consideration was written for each non-categorized change.

Table R – Relocated Specifications and Removed Details
ITS Section 5.0 – Administrative Controls

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
5.0 LA.10	6.8.4.f	CTS 6.8.4.f, “Radiological Environmental Monitoring Program,” describes a program to monitor the radiation and radionuclides in the environs of the plant. ITS 5.0 does not require such a program. This changes the CTS by moving the requirements for the Radiological Environmental Monitoring Program to the ODCM.	ODCM	10 CFR 50.59	Note 1
5.0 LA.11	4.4.10.1.2	CTS 4.4.10.1.2 states, “In addition to the requirements of Specification 4.0.5, at least one third of the main member to main member welds, joining A572 material, in the steam generator supports, shall be visually examined during each 40 month inspection interval.” The Inservice Inspection Program (ISI), controlled in accordance with 10 CFR 50.55. This changes the CTS by moving these requirements to the ISI program.	ISI	10 CFR 50.55	3
5.0 LA.12	4.6.1.1.c	CTS 4.6.1.1.c states, “After each closing of the equipment hatch, by leak rate testing the equipment hatch seals, with gas at P _a , greater than or equal to 44.1 psig. Results shall be evaluated against the criteria of Specification 3.6.1.2.b as required by 10 CFR 50, Appendix J, option B, as modified by approved exemptions, and in accordance with the guidelines contained in Regulatory Guide 1.163, dated September 1995.” ITS 5.0 does not include such a specific requirement for the equipment hatch. This changes the CTS by moving the reference leak rate testing for the equipment hatch to the Containment Leak Rate Testing Program (CLRTP).	CLRTP	10 CFR 50.59	3

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Note 1 - Certain Relocated Specifications and Removed Details changes for Chapter 5.0 did not fall into the categories used for the other Chapters. A specific Determination of No Significant Hazards Consideration was written for each non-categorized change.

APPENDIX D

ADDITIONAL CONDITIONS

FACILITY OPERATING LICENSE NOs. NPF-4 and NPF-7

Dominion Generation shall comply with the following conditions on the schedules noted below:

Amendment
Number

Additional Conditions

Date

This amendment authorizes the relocation of certain Technical Specification requirements to licensee-controlled documents. Implementation of this amendment shall include the relocation of these technical specification requirements to the appropriate documents, as described in Table R that are attached to the staff's [draft] Safety Evaluation enclosed with this amendment.

The amendment shall be implemented by [date].

The schedule for the performance of new and revised Surveillance Requirements (SRs) shall be as follows:

This amendment shall be implemented within XX days of the date of this

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

Amendment
Number

Additional Conditions

Implementation
Date

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

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

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

January 24, 2002

The draft SE, including four tables attached to the SE that list the changes to the CTS, documents the staff's review of your application dated December 11, 2000, as supplemented by letters dated June 18, July 16, July 20, August 13, August 27, September 27, October 10, October 17, November 8, November 19, November 29, December 2, December 13, 2001, and January 2, 2002. By your supplemental letters, you provided responses to the staff's RAs dated April 23, May 21, June 1, June 4, June 22, July 2, July 30, July 31, September 6, September 7, September 18, October 3, October 10, October 16, November 7, and December 7, 2001. The additional CTS changes not normally included in a TS conversion amendment (beyond-scope issues) are addressed in Section 3.G.

The staff's review was based on the Standard Technical Specifications, NUREG-1431, Revision 1, "Standard Technical Specifications for Westinghouse Plants," dated April 1995, and on guidance provided in the Commission's "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," published in the *Federal Register* on July 22, 1993 (58 FR 39132).

Sincerely,
/RA/

Stephen R. Monarque, Project Manager, Section 1
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-338 and 50-339

Enclosures:

1. Draft Safety Evaluation
2. Acceptable License Condition

cc w/encls: See next page

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