

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." CTS 1.6.5 states, "The sealing mechanism associated with each penetration (e.g. welds, bellows, or O-rings) is OPERABLE." This changes the CTS by moving the 1.6.1 and 1.6.5 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 |

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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 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 1 |
| 3.6.4 None | N/A | N/A | N/A | N/A | N/A |

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Change Category:
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|------------|------------------------------|--|----------|---|-----------------|
| 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.d | 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 |

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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
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5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

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 |
| 3.6.3 L.16 | CTS 4.6.1.1.a requires verification that all non-automatic containment isolation valves that are required to be closed are closed every 31 days. If a non-automatic valve that is supposed to be closed is found open, CTS 3.6.1.1 Action applies. That Action states, "Without primary CONTAINMENT INTEGRITY, restore CONTAINMENT INTEGRITY within one hour or be in at least Hot Standby within the next 6 hours and in Cold Shutdown within the following 30 hours." ITS 3.6.3 ACTIONS do not differentiate between automatic and non-automatic valves and allow 1 hour, 4 hours, or 72 hours to isolate the affected flow path. ITS 3.6.3 allows continued operation with the inoperable containment isolation valve, but if the Required Actions and associated Completion Times are not met, a shutdown to MODE 3 in 6 hours and MODE 5 in 36 hours is required. In addition, ITS 3.6.3 ACTIONS Notes 2, 3 and 4 allow separate condition entry for each penetration flow path, require entry into the applicable Conditions and Required Actions for systems made inoperable by containment isolation valves, and require entry into the applicable Conditions and Required Actions for LCO 3.6.1, "Containment," when leakage for a penetration flow path results in exceeding the overall containment leakage rate acceptance criteria. | 3.6.3 ACTIONS | 4.6.1.1.a | 4 |

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- 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.16 | This changes the CTS by providing 1 hour, 4 hours or 72 hours to isolate a penetration flow path affected by an inoperable non-automatic containment isolation valve, and allowing continued operation with an inoperable non-automatic containment isolation valve. This also changes the CTS by allowing separate condition entry for each penetration flow path with an inoperable non-automatic containment isolation valve, requiring entry into the applicable Conditions and Required Actions for systems made inoperable by inoperable non-automatic containment isolation valves, and requiring entry into the applicable Conditions and Required Actions for LCO 3.6.1, "Containment," when leakage through a penetration flow path due to an inoperable non-automatic containment isolation valve results in exceeding the overall containment leakage rate acceptance criteria. | 3.6.3 ACTIONS | 4.6.1.1.a | 4 |
| 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 |

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- 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 A – Administrative Changes
ITS Section 3.7 – Plant Systems

| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|-----------|--|-----------------|-----------------|
| 3.7.1 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | Various | Various |
| 3.7.1 A.2 | <p>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.</p> <p>This change is acceptable because the maximum allowable Power Range Neutron Flux - High setpoint for a condition of the main steam safety valves has not changed. This change is designated as administrative because it does not result in a technical change to the specifications.</p> | Table 3.7.1-1 | Table 3.7-1 |
| 3.7.1 A.3 | <p>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.</p> <p>This change is acceptable because the technical requirements have not changed. Each steam generator has five MSSVs. Therefore, "All" MSSVs per steam generator and "Five" MSSVs per steam generator is equivalent. In the MODES of applicability of this specification (MODES 1, 2, and 3), all RCS loops are required to be unisolated in accordance with ITS 3.4.17. Therefore, this reference to unisolated loops is unnecessary. In the ITS, the Table equivalent to CTS Table 3.7-2 is referenced in Surveillance 3.7.1.1. SR 3.0.1 states that failure to meet a Surveillance is failure to meet the LCO. Therefore, moving the Table reference from the LCO to a Surveillance has no effect. These changes are designated as administrative because they do not result in technical changes to the specifications.</p> | 3.7.1 | 3.7.1.1 |

Table A – Administrative Changes
ITS Section 3.7 – Plant Systems

| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|------------|--|-----------------|-----------------|
| 3.7.2 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | Various | Various |
| 3.7.2 A.2 | <p>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.</p> <p>This change is acceptable because the requirements have not changed. Both the CTS and the ITS state that the MSTVs must be tested in accordance with the Inservice Testing Program. This change is designated as administrative as the technical requirements are not changed.</p> | 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 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | 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 | <p>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.</p> <p>This change is acceptable because CTS 4.7.1.2.a.1 is currently considered to be applicable to all valves in both water and steam flow paths. Therefore, the methodology for the surveillance requirement remains technically the same. This change is designated as administrative because it does not modify the CTS requirement.</p> | SR 3.7.5.1 | 4.7.1.2.a.1 |
| 3.7.5 A.3 | <p>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.</p> <p>The change is acceptable because it maintains the current technical requirements interpretations of the CTS that pumps, referred to in the ACTIONS, are considered the pumps and associated flow paths as trains. This change is designated as administrative because CTS 3.7.1.2 and ITS 3.7.5 are equivalent requirements.</p> | 3.7.5 | 3.7.1.2 |
| 3.7.6 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | Various | Various |

Table A – Administrative Changes
ITS Section 3.7 – Plant Systems

| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|-----------|--|----------------------|-------------------------------|
| 3.7.6 A.2 | <p>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.</p> <p>The change is acceptable because the ITS maintains the technical requirements of the CTS ACTIONS and Surveillance. ITS ACTION A.1 and CTS ACTION b. and CTS Surveillance 4.7.1.3.2 require the verification of the CST to act as a backup to the ECST. The verification will be performed within four hours of the inoperability of the ECST and every twelve hours thereafter. ITS ACTION A.2 and CTS ACTION b. require the restoration of the ECST to OPERABLE status within seven days. The change is designated as administrative because all technical requirements of the CTS are maintained within the ITS requirements.</p> | 3.7.6 Action A | 3.7.1.3 Actions and 4.7.1.3.2 |
| 3.7.6 A.3 | <p>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 changes the CTS by moving the required volume of water in the ECST from the LCO to the Surveillance.</p> <p>This change is acceptable because the requirements have not changed. ITS SR 3.0.1 states that failure to meet an SR is failure to meet the LCO. Therefore, moving the required volume from the LCO to the SR has no effect. This change is designated administrative because it does not result in a technical change to the specifications.</p> | 3.7.6 and SR 3.7.6.1 | 3.7.1.3 |

Table A – Administrative Changes
ITS Section 3.7 – Plant Systems

| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|-----------|--|-----------------|-----------------|
| 3.7.7 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | Various | Various |
| 3.7.8 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | Various | Various |
| 3.7.8 A.2 | <p>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. The purpose of CTS 3.7.4.1 regarding references to both units is to make it clear that OPERABILITY of the SW System affects both units.</p> <p>This change is acceptable because both units are required to follow the Technical Specifications for their respective unit, and the SW System is a shared system. If a SW component is inoperable, both units enter the CONDITIONS applicable to their respective status. Therefore, eliminating the cross-unit references is an editorial change. This change is designated</p> | 3.7.8 | 3.7.4.1 |

Table A – Administrative Changes
ITS Section 3.7 – Plant Systems

| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|-----------|--|-----------------|-------------------------|
| 3.7.8 A.3 | <p>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. The purpose of the CTS 3.0.4 exemption is to provide an allowance to change MODES once the SW flow to the component cooling water (CC) heat exchangers has been throttled.</p> <p>This change is acceptable because ITS 3.0.4 allows MODE changes while in CONDITIONS that permit continued operation for an unlimited period of time. CTS 3.7.4.1 ACTION a requires throttling of the SW flow to the CC heat exchanger within 72 hours and then permits continued operation for an unlimited period of time. ITS 3.7.8 ACTION retains this REQUIRED ACTION and COMPLETION TIME. This change is designated as administrative because it does not result in technical changes to the CTS.</p> | 3.7.8 | 3.7.4.1 Action a |
| 3.7.8 A.4 | <p>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. The purpose of the temporary exemption was to allow system upgrades to be completed.</p> <p>This change is acceptable because the temporary exemption will no longer be valid at the time of ITS implementation. This change is designated as administrative because it does not result in technical changes to the CTS.</p> | N/A | 3.7.4.1 footnote “*” |
| 3.7.8 A.5 | <p>CTS 3.7.4.1 does not contain an explicit reference to isolating SW flow to individual components. ITS Surveillance 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.</p> <p>The purpose of the SW Technical Specification is to provide assurance that service water is available to the appropriate plant components. This change is acceptable because by current use and application of the CTS, isolation of a component supplied with service water does not result in the SW System being considered inoperable, but the respective component may be declared inoperable for its system. This change clarifies this application. This change is designated as administrative because it does not result in technical changes to the CTS.</p> | 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 | <p>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.</p> <p>The purpose of CTS 4.7.4.1.c.1 is to provide assurance that required SW valves are in their correct position. This change is acceptable because it clarifies that this requirement applies to valves in the SW flow path. This change is designated as administrative because it does not result in technical changes to the CTS.</p> | SR 3.7.8.2 | 4.7.4.1.c.1 |
| 3.7.8 | A.7 | <p>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.</p> <p>The purpose of the CTS 4.7.4.1.c.1 and CTS 4.7.4.1.c.2 is to provide assurance that the required SW automatic valves actuate to their correct position on their respective actuation signals. ITS SR 3.7.8.2 retains this requirement. This change is designated as administrative because it does not result in technical changes to the CTS.</p> | 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 | | |

Table A – Administrative Changes
ITS Section 3.7 – Plant Systems

| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|------------|---|-----------------|------------------|
| 3.7.8 A.10 | <p>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 The purpose of CTS 3.7.4.1 Action a is to provide assurance that component cooling heat exchanger flow is throttled within 72 hours of a SW pump inoperability so that the SW System is available when needed.</p> <p>This change is acceptable because the requirement to perform the action in accordance with approved procedures is redundant to other Specifications. ITS Section 5.4.1 requires that written procedures be established, implemented, and maintained covering activities which include the applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978. Regulatory Guide 1.33 Appendix A states that among the typical safety-related activities that should be covered by written procedures, list number 3, Procedures for Startup, Operation, and Shutdown of Safety-Related PWR Systems, instructions for energizing, filling, venting, draining, startup, shutdown, and changing modes of operation should be prepared, as appropriate, for systems which include item “m”, “Service Water System”. CTS 3/4.7.4.1 Action a, throttling component cooling water heat exchanger flow, would be considered changing the mode of operation of the system. Therefore, deleting this statement from CTS 3.7.4.1 has no effect on plant operation. This change is designated as administrative because it does not result in technical changes to the CTS. 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.</p> | 3.7.8 | 3.7.4.1 Action a |
| 3.7.9 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | 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 | <p>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.</p> <p>The purpose of CTS 3.7.5.1 is to provide assurance that the water in the UHS can provide required cooling in case of an event. This change is acceptable because the parameter requirements for the UHS are retained, but are moved from the LCO to the SRs. These changes are designated as administrative because they do not result in technical changes to the CTS.</p> | SR 3.7.9.1 and 3.7.9.2 | 3.7.5.1 |
| 3.7.10 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | Various | Various |
| 3.7.10 A.2 | <p>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.</p> <p>This change is acceptable because filter testing requirements are being moved to the VFTP as part of ITS 5.0, and ITS SR 3.7.10.2 references the VFTP for performing these tests. This change is designated as administrative because it does not result in technical changes to the CTS.</p> | 5.5.10 | 3.7.10.2 |
| 3.7.11 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | Various | Various |

Table A – Administrative Changes
ITS Section 3.7 – Plant Systems

| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|-------------|--|-----------------|-----------------|
| 3.7.12 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | Various | Various |
| 3.7.12 A.2 | <p>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.</p> <p>This change is acceptable because filter testing requirements are being moved to the VFTP as part of ITS 5.0, and ITS SR 3.7.12.2 references the VFTP for performing these tests. This change is designated as administrative because it does not result in technical changes to the CTS.</p> | 5.5.10 | 4.7.8.1 |
| 3.7.13 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | Various | Various |
| 3.7.14 None | N/A | N/A | N/A |
| 3.7.15 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | Various | Various |

Table A – Administrative Changes
ITS Section 3.7 – Plant Systems

| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|------------|---|---|-----------------|
| 3.7.15 A.2 | <p>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.</p> <p>This change is acceptable because it reflects an existing plant practice necessary for the safe operation of the unit. This change is designated as administrative because it does not result in technical changes to the CTS.</p> | 3.7.15 LCO Note | None |
| 3.7.15 A.3 | <p>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.</p> <p>This change is acceptable because all the fuel movement within the fuel building occurs within the spent fuel pit, and requirements associated with the fuel movements remain the same. This change is designated as administrative because it does not result in technical changes to the CTS.</p> | 3.7.15 | 3.9.12 |
| 3.7.15 A.4 | <p>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.</p> <p>This change is acceptable because ITS LCO 3.0.4 and ITS SR 3.0.4 requirements are consistent with those stated in the CTS. This change is designated as administrative because it does not result in technical changes to the CTS.</p> | 3.7.15 Actions Note, LCO 3.0.4 and SR 3.0.4 | 3.9.12 Action c |
| 3.7.16 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | Various | Various |

Table A – Administrative Changes
ITS Section 3.7 – Plant Systems

| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|------------|---|-----------------|-----------------|
| 3.7.17 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | Various | Various |
| 3.7.18 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | Various | Various |

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

| DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Type |
|------------|---|-----------------|---------------------|-------------|
| 3.7.5 L.10 | CTS 3.7.1.2 ACTION a. states that with one AFW pump inoperable, restore the pump to OPERABLE status within 72 hours or be in HOT SHUTDOWN (i.e., MODE 4) within 6 hours. ITS ACTION C states that if an inoperable AFW train is not restored, be in MODE 3 in 6 hours and MODE 4 in 18 hours. This changes the CTS by allowing 6 hours to be in MODE 3 instead of MODE 4 and allowing 18 hours to be in MODE 4. | 3.7.5 ACTION C | 3.7.1.2 ACTION a | 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 |
| 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 |

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- 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 Section 3.7 did not fall into the categories used for the other Section. A specific Determination of No Significant Hazards Consideration was written for each non-categorized Less Restrictive Change in Section 3.7.

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.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 | 4.7.7.1.d.2 | 6 |
| 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 M.5. | SR 3.7.10.4 | 4.7.7.1.d.2 | 7 |

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- 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 Section 3.7 did not fall into the categories used for the other Section. A specific Determination of No Significant Hazards Consideration was written for each non-categorized Less Restrictive Change in Section 3.7.

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 | §1 |
| 3.7.14 None | N/A | N/A | N/A | N/A |

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- 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 Section 3.7 did not fall into the categories used for the other Section. A specific Determination of No Significant Hazards Consideration was written for each non-categorized Less Restrictive Change in Section 3.7.

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. | None | 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/MFIVs), 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 |

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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 | 4.7.7.1.d.2 |

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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 84-102 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 M.1 | N/A CTS 3.7.14 requires a spent fuel storage pool boron concentration of at least 2500 ppm. ITS 3.7.17 requires a spent fuel storage pool boron concentration of at least 2600 ppm. This changes the CTS by increasing the minimum spent fuel storage pool boron concentration. | N/A 3.7.17 | N/A 3.7.14 |
| 3.7.18 None | N/A | N/A | N/A |

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INADVERTENTLY
OMITTED

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 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | Various | Various |
| 3.8.1 A.2 | <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 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.” This changes the CTS by specifically stating the requirement in the ITS Action J.</p> <p>The purpose of the proposed change is to structure the existing electrical requirements for the shared components in the ITS by placing electrical requirements in ITS section 3.8. This change is acceptable because the AC sources requirements for the SW, MCR/ESGR Emergency Habitability System, and ECCS Pump Room Exhaust Cleanup System functions are contained in the electrical requirement section of the unit’s Technical Specifications. The additional requirements of the fans in the ventilation specifications are addressed by more restrictive discussion of changes to the CTS requirements. The additional electrical requirements are classified as administrative because of the systems may require electrical power from both units in order to satisfy the individual safety function. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | 3.8.1, Required Action J | CTS LCO 3.7.4.1 |

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

| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|-----------|---|-----------------------|--------------------------------|
| 3.8.1 A.3 | <p>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.</p> <p>This change is acceptable because no technical requirements are added to or deleted from the current requirements. The change in format of the CTS, with the conversion to the ITS, maintains all technical requirements. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | 3.8.1, ACTION B and C | 3.8.1.1, Actions b.1 and b.2 |
| 3.8.1 A.4 | <p>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.</p> <p>This change is acceptable because no changes are made to CTS requirements. The change in format from the CTS to the ITS maintains all technical requirements. The addition of the Note only acts as a reminder to enter all appropriate Actions if any emergency bus becomes de-energized. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | 3.8.1 Action H Note | 3.8.1.1, Action c, LCO 3.8.2.1 |

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

| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---------------|---|-----------------|-------------------|
| 3.8.1 A.5 | <p>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.</p> <p>This change is acceptable because the technical requirements remain the same. If an offsite circuit and an EDG become inoperable at the same time, the requirement to perform a breaker and power availability check on the OPERABLE offsite circuit and an evaluation or start on the OPERABLE EDG, continue to be required. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | 3.8.1, Action H | 3.8.1.1, Action c |

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| 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> <p>This change is acceptable because the technical requirements remain the same. The ITS requires multiple condition entry. Therefore, ITS Actions A and G would both be entered if two offsite circuits were inoperable and Action A would be followed until both offsite circuits were restored to OPERABLE status. This has the same effect as the CTS requirements. Therefore, the deletion of the wording in CTS 3.8.1.1 Action d does not modify the technical requirements of the CTS and the unit would be required to be in MODE 5 (COLD SHUTDOWN) within 30 hours after reducing to MODE 3 (HOT STANDBY). This change is designated as administrative because it does not result in a technical change to the CTS.</p> | 3.8.1, ACTIONS A and G | 3.8.1.1, Actions a and d |

Table A – Administrative Changes
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| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|-----------|--|------------------------|--------------------------|
| 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> <p>This change is acceptable because the technical requirements remain the same. The ITS requires multiple condition entry. Therefore, ITS Actions B and I would both be entered if two EDGs were inoperable and Action B would be followed until both EDGs were restored to OPERABLE status. This has the same effect as the CTS requirements. Therefore, the deletion of the wording in CTS 3.8.1.1 Action e does not modify the technical requirements of the CTS and the unit would be required to be in MODE 5 (COLD SHUTDOWN) within 30 hours after reducing to MODE 3 (HOT STANDBY). This change is designated as administrative because it does not result in a technical change to the CTS.</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.</p> <p>The change is acceptable because the CTS Actions for more than two sources inoperable are the same as the ITS Actions. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | 3.8.1, ACTION M | LCO 3.8.1.1 |

Table A – Administrative Changes
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| 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. The purpose of the proposed change is to structure the existing electrical requirements for the shared components in the ITS by placing electrical requirements in ITS Section 3.8.</p> <p>This change is acceptable because the AC sources requirements for the SW, MCR/ESGR Emergency Habitability System, and ECCS Pump Room Exhaust Cleanup System functions are moved to the electrical requirement section of the unit’s Technical Specifications. The additional requirements of the fans in the ventilation specifications are addressed by more restrictive discussion of changes to the CTS requirements. The movement of the electrical requirements is classified as administrative because of the systems may require electrical power from both units in order to satisfy the individual safety function. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | LCO 3.7.10, LCO 3.7.12, LCO 3.8.1.c | LCO 3.7.4.1 |

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| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|------------|--|-----------------|-----------------|
| 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.” This changes the CTS by specifically stating the requirements and allowances in the ITS format.</p> <p>This change is acceptable because the requirements of the CTS are maintained in the ITS requirements. ITS Note1 maintains the allowances provided by the CTS note for a prelube and warmup period prior to loading. ITS Note 2 establishes that ITS SR 3.8.1.2 may involve idling and gradual acceleration to synchronous speed and SR 3.8.1.2 may be credited when performing SR 3.8.1.7. This is acceptable because the CTS note allows loading in accordance with loading recommendations and SR 3.8.1.7 meets or exceeds the technical requirements of SR 3.8.1.2. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | SR 3.8.1.2 | 4.8.1.1.2.a.4 |
| 3.8.1 A.11 | <p>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.</p> <p>This change is acceptable because Notes 1 and 2 in ITS SR maintain the allowances provided by the CTS notes. The changes to the notes are editorial and conform to the format of the ISTS. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | SR 3.8.1.3 | 4.8.1.1.2.a.4 |
| 3.8.1 A.12 | Not used. | N/A | N/A |

Table A – Administrative Changes
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| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|------------|--|---|-------------------------------------|
| 3.8.1 A.13 | <p>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).</p> <p>This change is acceptable because the division of the current requirement 4.8.1.1.2.c into ITS SR 3.8.1.2 or SR 3.8.1.7 and 3.8.1.3 maintains the requirements of starting, synchronizing with the emergency bus, and fully loading the EDG for 60 minutes. Additional changes to requirement 4.8.1.1.2.c are discussed in other discussion of changes. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | SR 3.8.1.7, SR 3.8.1.3 Note | 4.8.1.1.2.c |
| 3.8.1 A.14 | <p>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.</p> <p>This change is acceptable because the CTS requirements for testing the AC sources do not specifically state the MODES in which the tests must be performed, but simply state “during shutdown.” The ITS SRs’ Note provides specific MODES in which test is not to be performed. With the unit in MODE 5, 6, or defueled (no MODE), the performance of these required tests can be conducted with minimum effects on the electrical system for the EDG that is not required to be OPERABLE. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | 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 |

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| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|------------|--|---------------------|------------------------------|
| 3.8.1 A.15 | <p>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 portion of the Note that addresses the power factor limitation is discussed later in these discussions of changes.</p> <p>This change is acceptable because this portion of Note 1 in ITS SR maintains the allowance provided by the CTS note. The changes to the note are editorial and conform to the format of the ISTS. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | SR 3.8.1.13 Note 1 | 4.8.1.1.2.a.6 |
| 3.8.1 A.16 | <p>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.”</p> <p>This change is acceptable because Note 1 of the ITS SR maintains the requirement provided in the CTS. The changes to the requirements and note are editorial and conform to the format of the ISTS. This change is designated as administrative because it does not result in a technical change to the CTS</p> | SR 3.8.1.14, Note 1 | 4.8.1.1.2.a.10, footnote *** |
| 3.8.1 A.17 | <p>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.</p> <p>This change is acceptable because SR 4.8.1.1.1.b has been deleted for Unit 2. The purpose of the note is to limit the SR to be required for Unit 1. This change is designated as administrative because the addition of the Note does not result in a technical change to the Unit 1 CTS.</p> | SR 3.8.1.8, Note | Unit 1 4.8.1.1.1.b |

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| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|------------|---|-----------------|-----------------|
| 3.8.1 A.18 | <p>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. This changes the CTS by eliminating the EDG output breaker overcurrent from the list of EDG trips.</p> <p>This change is acceptable because the output breaker overcurrent does not provide a trip of the EDG. With the deletion of the output breaker overcurrent, no technical requirement is added or deleted with the conversion of the CTS requirements to the ITS requirements. The output breaker overcurrent should not have been included in the CTS requirements. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | SR 3.8.1.12 | 4.8.1.1.2.d.5.c |

Table A – Administrative Changes
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| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|------------|--|--|-----------------|
| 3.8.1 A.19 | <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 3.8.1 Action 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.</p> <p>This change is acceptable because the technical requirements of the CTS are maintained in the ITS. If a shared components is required to be OPERABLE for this unit and the pump or fan is powered from the other unit’s electrical system, the loss of the normal and emergency AC source would required the pump or fan to be declared inoperable and appropriate Action for the affected system to be entered. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | LCO 3.7.10, LCO 3.7.12 3.8.1, Action F | LCO 3.7.4.1 |

Table A – Administrative Changes
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| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|------------|---|-----------------|-----------------|
| 3.8.1 A.20 | <p>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. This changes the CTS specifically stating that the non-critical EDG trips are bypassed on any automatic start signal. The specific automatic start signal is moved to the ITS Bases by DOC LA.1.</p> <p>This change is acceptable because the technical requirements remain unchanged. The EDGs will continue to have their non-critical trips verified to be bypassed on a start from a signal from either an ESF or loss of voltage signal. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | 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 | <p>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. This changes the CTS by stating the requirement that the EDG must be capable of supplying the onsite Class 1E power distribution subsystem.</p> <p>This change is acceptable because the EDGs may only be connected to the onsite Class 1E subsystems. The change in wording does not modify the technical requirements. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | LCO 3.8.1 | LCO 3.8.1.1 |
| 3.8.2 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | Various | Various |

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| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|-----------|--|--------------------------------|--------------------------|
| 3.8.2 A.2 | <p>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.” Other changes to CTS ACTION are addressed in by additional discussion of changes in this section. The purpose of the Note is to remind the user that if an emergency bus becomes de-energized with the loss of the offsite circuit and the required EDG, ITS LCO 3.8.10 would be entered for specific Required Actions.</p> <p>The change is acceptable because the requirements of the CTS would require an evaluation of potential Actions for inoperable buses and equipment. The change is designated as administrative because the Note only acts as a reminder to enter all necessary specifications for a specific condition and does not change the technical requirements of the CTS.</p> | 3.8.2, ACTION B Note | 3.8.1.2, Action a |
| 3.8.3 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | Various | Various |
| 3.8.3 A.2 | <p>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.</p> <p>This change is acceptable because the current requirements are translated into ITS form with no technical changes. The fuel oil is a support system for each EDG that is required to maintain the EDG’s OPERABILITY. The CTS and ITS maintain this relationship between the EDGs and the fuel oil system without any changes in the technical requirements. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | LCO 3.8.3, 3.8.3 Applicability | 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.3 | <p>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.</p> <p>This change is acceptable because each EDG is provided with an independent source for starting air. Each EDG requires an independent fuel oil supply by separate transfer lead and backup pumps and day tank. The requirements of the CTS deal only the fuel oil requirements and separate condition entry is allowed by the current requirements. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | 3.8.3 ACTIONS Note | LCO 3.8.1.1, LCO 3.8.1.2 |
| 3.8.3 A.4 | <p>CTS 3.8.1.1 Actions do not specifically state Required Actions for an EDG if sufficient fuel oil is not available. ITS Condition F states, “Required Action and associated Completion Time not met, or one or more EDGs diesel fuel oil or starting air systems not within limits for reasons other than Condition A, B, C, D, or E, 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.</p> <p>This change is acceptable because the CTS requirements are structured as a support system for EDGs OPERABILITY. Specifically stating the requirement to declare the EDG(s) inoperable does not change the technical intent of the current requirements. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | 3.8.3, Condition F | 3.8.1.1 Actions |
| 3.8.3 A.5 | <p>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.</p> <p>This change is acceptable because the requirements in LCO 3.8.1 specify the testing frequency of the EDG. The fuel oil level is verified to ensure OPERABILITY of the EDG. Therefore, the frequency of the testing is dependent on the testing requirements of the EDG. This change reflects the requirements of the CTS in the ITS format. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | SR 3.8.3.1 | 4.8.1.1.2, 4.8.1.1.2.a.2 |

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

| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|-----------|--|-------------------|--------------------------------|
| 3.8.3 A.6 | <p>CTS LCO 3.8.1.1.b.2 states that the fuel storage system consists of two under ground storage tanks each containing a minimum of 45,000 gallons of fuel and this is a shared system between units. ITS Condition B states, “One or more EDGs with fuel oil inventory < 90,000 gallons . . . ,” and SR 3.8.3.1 requires the verification of “fuel oil inventory of ≥ 90,000 gal of fuel.” This changes the CTS by stating the total inventory requirement of fuel oil instead of the individual fuel oil tank requirement.</p> <p>The purpose of CTS 3.8.1.1.b.2 is to require sufficient fuel oil inventory for two EDGs to operate at full load for 7 days as required to support the accident analysis. This change is acceptable because the total inventory requirement for the EDG fuel oil system of 90,000 gallons remain the same. This change is designated as administrative because it does not result in technical changes to the CTS.</p> | 3.8.3 Condition B | 3.8.1.1.b.2 |
| 3.8.4 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | Various | Various |
| 3.8.4 A.2 | <p>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.”</p> <p>This change is acceptable because the intent of the CTS is maintained in the ITS requirements. The ITS adds a clarifying statement that expresses the CTS requirements with no modifications to technical requirements. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | SR 3.8.4.3 | 4.8.2.3.2.c.1 4.8.1.1.3.c.1 |

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| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|-----------|---|-----------------|---|
| 3.8.4 A.3 | <p>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 \geq 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.</p> <p>This change is acceptable because the technical requirements of the CTS are maintained in the ITS requirements. The re-arrangement of the SR in the ITS format does not add or delete any required testing of the CTS. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | 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 |
| 3.8.4 A.4 | <p>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.</p> <p>This change is acceptable because the CTS requirements for the EDG's DC requirements are maintained in the ITS format without any technical requirements being modified. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | LCO 3.8.4 | 4.8.1.1.3 |

Table A – Administrative Changes
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| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|-----------|--|---------------------------|-----------------------------|
| 3.8.4 A.5 | <p>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.</p> <p>This change is acceptable because the electrical requirement contained in CTS LCO 3.7.4.1 is moved into the appropriate LCO of the ITS without technical change. The required DC subsystems of the other unit must be required to be OPERABLE for this unit in order to maintain the required shared components OPERABLE. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | LCO 3.8.4 | LCO 3.8.2.3, LCO 3.7.4.1 |
| 3.8.4 A.6 | <p>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.</p> <p>This change is acceptable because the electrical requirement contained in CTS LCO 3.7.4.1 are moved into the appropriate Condition of the ITS without technical change. If the required DC subsystems of the other unit become inoperable for the required shared components, then the shared components will be declared inoperable immediately. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | LCO 3.8.4, Condition D | LCO 3.8.2.3 |
| 3.8.5 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | Various | Various |

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| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|-----------|--|--|----------------------|
| 3.8.5 A.2 | <p>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.</p> <p>This change is acceptable because the CTS requirements for the EDGs’ DC systems are maintained in the conversion to the ITS requirements. The DC system is required when the supported EDG is required to be OPERABLE. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | LCO 3.8.5, Action B | 4.8.1.2, 4.8.1.1.3 |
| 3.8.6 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | Various | Various |
| 3.8.6 A.2 | <p>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.</p> <p>The change is acceptable because these requirements continue to ensure the OPERABILITY for the station and EDG batteries. The specific addition of the ITS LCO, Applicability, and Note does not change any technical requirement of the CTS requirements, but provides a clarifying statement for the current requirements. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | LCO 3.8.6, 3.8.6 Applicability, ACTIONS Note | 4.8.2.3.2, 4.8.1.1.3 |

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| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|-----------|--|-----------------|---|
| 3.8.6 A.3 | <p>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.</p> <p>The change is acceptable because these requirements ensure the station and EDG batteries are verified within specified parameters or the battery is declared inoperable. This is the intent of the CTS requirements on the battery cell parameters listed in a Note to Table 4.8-3. Other changes to the battery cell parameters are addressed in more and less restrictive changes in these discussion of changes. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | 3.8.6, ACTION B | 4.8.2.3.2, 4.8.1.1.3, Table 4.8-3 |
| 3.8.6 A.4 | <p>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.</p> <p>The change is acceptable because these requirements ensure the station and EDG batteries that are needed to support shared components on the other unit, needed for this unit, are maintained OPERABLE. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | LCO 3.8.6 | LCO 3.7.4.1 |

Table A – Administrative Changes
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| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|-----------|--|-----------------|-------------------|
| 3.8.7 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS</p> | Various | Various |
| 3.8.7 A.2 | <p>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.</p> <p>This change is acceptable because the ITS divides the requirements for the electrical sources from the electrical power distribution systems but does not change the technical requirements. The inverters provide the regulated 120-volt AC electrical source(s) for the 120 VAC distribution systems. The 120 VAC distribution systems are addressed by ITS LCO 3.8.9, "Distribution Systems – Operating." This change retains the technical requirements for the inverters. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | LCO 3.8.7 | LCO 3.8.2.1 |
| 3.8.7 A.3 | <p>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.</p> <p>This change is acceptable because the ITS divides the requirements for the electrical sources from the electrical power distribution systems. The inverters provide the regulated 120-volt AC electrical source(s) for the 120 VAC distribution systems. As a result the ITS states the requirement in terms of the inverter, while the CTS states the requirement in terms of the bus. However, the technical requirements remain unchanged. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | 3.8.7, ACTION A | 3.8.2.1, Action c |

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| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|-----------|--|----------------------|-------------------|
| 3.8.7 A.4 | <p>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.</p> <p>This change is acceptable because the ITS separates the requirements of the electrical sources from the distribution systems without changing the technical requirements. The inoperability of the source may lead to the de-energized bus. Therefore, the user is reminded to enter the appropriate Conditions that may occur from the inoperable electrical source. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | 3.8.7, ACTION A Note | 3.8.2.1, Action c |
| 3.8.8 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | Various | Various |
| 3.8.8 A.2 | <p>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</p> <p>This change is acceptable because the requirement for inverters to provide electrical power for the AC buses remains unchanged. The inverters provide the associated AC bus with the necessary power to energize the bus. This change is designated as administrative because it does not result in a technical change to the CTS..</p> | LCO 3.8.8 | LCO 3.8.2.2 |

Table A – Administrative Changes
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| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|-----------|--|-----------------|-----------------------------|
| 3.8.9 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | Various | Various |
| 3.8.9 A.2 | Not used. | N/A | N/A |
| 3.8.9 A.3 | <p>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.</p> <p>This change is acceptable because CTS LCO 3.0.3 would be entered when a LCO is not met and there are no Conditions or Required Actions stated. The loss of more than one bus continues to require the entry into LCO 3.0.3 in the CTS and ITS. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | 3.8.9 ACTION G | None |
| 3.8.9 A.4 | <p>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 busses 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.</p> <p>This change is acceptable because the technical requirements of the CTS are maintained in the ITS requirements. The CTS and the ITS require the various AC and DC subsystems to be OPERABLE. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | LCO 3.8.9 | LCO 3.8.2.1, LCO 3.8.2.3 |

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| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|------------|---|-------------------------------|-----------------|
| 3.8.9 A.5 | <p>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.</p> <p>The change is acceptable because these requirements ensure the electrical distribution systems that are needed to support shared components on the other unit, needed for this unit, are maintained OPERABLE. This is the intent of the CTS requirements in LCO 3.7.4.1 for the required shared components are to ensure all electrical system necessary to power these components. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | LCO 3.8.9 | LCO 3.7.4.1 |
| 3.8.10 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | Various | Various |
| 3.8.10 A.2 | <p>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.</p> <p>This change is acceptable because the RHR subsystem(s) would be declared inoperable under the CTS requirements. This addition does not change the technical requirements of the CTS but acts as a reminder to enter the Action for the RHR subsystem(s). This change is designated as administrative because it does not result in a technical change to the CTS.</p> | 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.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 a CTS Surveillance. | None | Unit 2 4.8.1.1.1.b | 5 |

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- 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 |

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- 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 |
| 3.8.1 L.20 | <u>CTS Surveillance Requirement 4.8.1.1.2.d.1 requires verification that an EDG provides power at the appropriate frequency and voltage following a load rejection. CTS 4.8.1.1.2.d states that this test is to be performed every 18 months “during shutdown.” This Surveillance is performed during shutdown, but an identical test is performed at power following on-line EDG maintenance. ITS SR 3.8.1.9 does not restrict performance of the SR in any MODE. This changes the CTS by allowing the MODE 1, 2, 3 or 4 performance of the load rejection test to be credited for meeting the Surveillance.</u> | <u>SR 3.8.1.9</u> | <u>4.8.1.1.2.d.1</u> | <u>6</u> |

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- 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.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 |
| 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: <u>SR 3.8.1.3, SR 3.8.1.6, SR 3.8.1.9, SR 3.8.1.10, SR 3.8.1.12, SR 3.8.1.13, SR 3.8.1.14, SR 3.8.1.15 and SR 3.8.1.16</u> 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 |

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- 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.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 <u>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, 3.8.1.10, 3.8.1.12, 3.8.1.13, 3.8.1.14, 3.8.1.15, and 3.8.1.16. This changes the CTS by not requiring Surveillances 4.8.1.1.1.b, 4.8.1.1.2.d.4, 4.8.1.1.2.d.5, and 4.8.1.1.2.e</u> 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 |
| 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 |

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- 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.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 €B allows 48 hours to restore a fuel oil level to 45 90 ,000 gallons, provided the level is 38,600 77,200 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 €B | 3.8.1.1 | 4 |
| 3.8.3 L.2 | Not used. | N/A | N/A | N/A |
| 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 |

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- 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.4 | <u>CTS 3.8.1.1.f allows one of the underground fuel oil storage tanks to be inoperable for inspection and repair provided certain conditions are met and the tank is restored within 7 days. If those conditions are not met or the tank is not restored within 7 days, both units must be in at least Hot Standby within the next 6 hours and Cold Shutdown within the following 30 hours. ITS 3.8.1, Condition A, allows one of the underground fuel oil storage tanks to be inoperable for inspection and repair provided certain conditions are met and the tank is restored within 7 days. If those conditions are not met or the tank is not restored within 7 days, ITS Condition F requires the associated EDGs to be declared inoperable immediately. Once the associated EDGs are declared inoperable, the appropriate Conditions and Required Actions of Specification 3.8.1 must be followed. ITS 3.8.1, Condition L, which applies with two EDGs inoperable, allows two hours to restore one EDG and then Condition L requires the unit to be in MODE 3 in 6 hours and MODE 5 in 36 hours. This changes the CTS by allowing an additional 2 hours to restore compliance with LCO 3.8.3 or LCO 3.8.1 if the Required Actions of Condition A are not met.</u> | <u>3.8.1 Condition A</u> | <u>3.8.1.1.f</u> | <u>4</u> |
| 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 ≥ 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 |

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- 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 |
|------------|--|---|------------------------------|
| 3.8.2 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 BA .2.4 and CB .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 | 3.8.1.42, 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 -C 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 C, 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 |

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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 > 145-150 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 than 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) |

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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 be 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 3.8.3.2 verifies fuel oil properties and SR 3.8.3.4 states checks for and removes accumulated water from each stored fuel oil tank. The Bases for SR 3.8.3.2 discusses viscosity and sediment. 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 |

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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 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, Condition A, allows one fuel oil storage tank to be inoperable to perform inspection or repair 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 |

REV 11

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 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | None | Various |
| 3.9.1 A.2 | <p>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.</p> <p>This change is acceptable because the technical requirements have not changed. Both the ITS and CTS Specifications are applicable in MODE 6. The ITS defined MODE 6 as, "one or more reactor vessel head closure bolts less than fully tensioned." Therefore, the CTS LCO statement is equivalent to the ITS Applicability and the conditions under which the LCO applies have not changed. The ITS MODE 6 Applicability is defined as the reactor vessel head unbolted or removed, so the Applicability footnote is not required. This change is designated as administrative because the technical requirements of the specifications have not changed.</p> | None | LCO 3.9.1 |
| 3.9.1 A.3 | <p>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.</p> <p>This change is acceptable because the technical requirements have not changed. The refueling cavity is considered to be governed by the CTS requirements because the refueling cavity is typically connected to the RCS, the refueling canal, or both. This change is designated as administrative because the technical requirements of the specifications have not changed.</p> | LCO 3.9.1 | 3.9.1 |
| 3.9.1 A.4 | <p>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.</p> <p>This change is acceptable because the technical requirements have not changed. ITS LCO 3.0.3 is not applicable in MODE 6. Therefore, the LCO 3.0.3 exception is not needed. This change is designated as administrative because the technical requirements of the specifications have not changed.</p> | None | 3.9.1 |

Table A – Administrative Changes
ITS Section 3.9 – Refueling Operations

| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|-----------|---|-----------------|-----------------|
| 3.9.2 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | None | Various |
| 3.9.2 A.2 | <p>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."</p> <p>This change is acceptable because the technical requirements have not changed. In the ITS, requirements that valves be locked, sealed, or otherwise secured are located in the Surveillances, not the LCO. Under SR 3.0.1, the SRs provide requirements necessary to meet the LCO. Therefore, moving the requirement from the LCO to the SR has no effect. The addition of the phrase "under administrative control" to the LCO Note is consistent with the ITS conventions and does not change the application of the Note as, according to UFSAR Section 15.2.4, strict administrative controls are applied to the operation of the primary grade water flow path isolation valves. This change is designated as administrative because it does not result in a technical change to the specifications.</p> | SR 3.9.2.1 | 3.1.1.3.2 |
| 3.9.3 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | 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 | <p>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. This changes the CTS by deleting the reference to LCO 3.0.3.</p> <p>This change is acceptable because the statement is not required to be stated in the CTS or ITS requirements. Therefore, deleting the statement does not modify any technical requirements contained in the CTS. This change is designated as administrative because it does not result in a technical change to the CTS.</p> | None | LCO 3.9.2 |
| 3.9.4 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | None | Various |
| 3.9.4 A.2 | <p>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.” This changes CTS by deleting an allowance already provided in a different portion of the ITS.</p> <p>This change is acceptable because ITS LCO 3.0.3 requirements are consistent with those stated in the CTS. This change is designated as administrative because it does not result in technical changes to the CTS.</p> | None | 3.9.4 |
| 3.9.4 A.3 | <p>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 changes the CTS by eliminating the discussion of the required status of the containment penetrations from the Surveillance.</p> <p>This change is acceptable because the CTS requirements have not changed. The required status of the penetrations in CTS 4.9.4 is the same as the description in CTS LCO 3.9.4. The ITS eliminates this duplication by referring to the "required status" of the penetrations and relying on the LCO description. The changes to the CTS LCO requirements are described in other DOCS. This change is designated as administrative because it does not result in technical changes to the CTS.</p> | SR 3.9.4.1 | 4.9.4 |

Table A – Administrative Changes
ITS Section 3.9 – Refueling Operations

| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|-----------|--|-----------------|--------------------|
| 3.9.4 A.4 | <p>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 changes the CTS by eliminating the explicit discussion of the containment personnel airlock surveillance testing.</p> <p>This change is acceptable because the CTS requirements have not changed. Both the CTS and the ITS require verification that one containment airlock door is capable of being closed every 7 days. This change is designated as administrative because it does not result in technical changes to the CTS.</p> | SR 3.9.4.1 | 4.9.4, footnote ** |
| 3.9.4 A.5 | <p>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 contain these restrictions.</p> <p>This change is acceptable because the requirements in the footnote are duplicative of the requirements of ITS LCO 3.9.7, which requires movement of recently irradiated fuel assemblies within containment. Addition of the word "recently" is addressed in the DOCs of ITS 3.9.7. This change is designated as administrative because it does not result in technical changes to the CTS.</p> | None | 3.9.4, Footnote * |
| 3.9.5 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | None | Various |
| 3.9.5 A.2 | <p>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. This changes CTS by deleting an allowance already provided in a different portion of the ITS.</p> <p>This change is acceptable because the ITS definition of OPERABLE contains the necessary requirements for a component to perform its safety function. This change is designated as administrative because it does not result in technical changes to the CTS.</p> | None | 3.9.8.1 Footnote * |

Table A – Administrative Changes
ITS Section 3.9 – Refueling Operations

| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|-----------|--|-----------------|--------------------|
| 3.9.5 A.3 | <p>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. This changes the CTS by requiring that the loading of irradiated fuel assemblies be suspended instead of requiring that all operations involving an increase in the reactor decay heat load be suspended.</p> <p>This change is acceptable because the requirements have not changed. The reactor decay heat load is generated by irradiated fuel. The only method of increasing the decay heat load of a reactor in MODE 6 is to load additional irradiated fuel assemblies into the core. Therefore, the CTS and ITS requirements are equivalent. This change is designated as administrative because it does not result in technical changes to the CTS.</p> | 3.9.5 Actions | 3.9.8.1, Action b |
| 3.9.5 A.4 | <p>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." This changes CTS by deleting an allowance already provided in a different portion of the ITS.</p> <p>This change is acceptable because ITS LCO 3.0.3 requirements are consistent with those stated in the CTS. This change is designated as administrative because it does not result in technical changes to the CTS.</p> | None | 3.9.8.1 Action d |
| 3.9.6 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | None | Various |
| 3.9.6 A.2 | <p>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. This changes CTS by deleting an allowance already provided in a different portion of the ITS.</p> <p>This change is acceptable because the ITS definition of OPERABLE contains the necessary requirements for a component to perform its safety function. This change is designated as administrative because it does not result in technical changes to the CTS.</p> | None | 3.9.8.2 Footnote * |

Table A – Administrative Changes
ITS Section 3.9 – Refueling Operations

| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|-----------|---|--------------------|-------------------|
| 3.9.6 A.3 | <p>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 providing the option to exit the Applicability of the LCO.</p> <p>This change is acceptable because the requirements have not changed. Exiting the Applicability of LCO is always an option to exit a Condition. Therefore, stating this option explicitly does not change the requirements of the specification. This change is designated as administrative because it does not result in technical changes to the CTS.</p> | 3.9.6, Condition A | 3.9.8.2, Action a |
| 3.9.6 A.4 | <p>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.” This changes CTS by deleting an allowance already provided in a different portion of the ITS.</p> <p>This change is acceptable because ITS LCO 3.0.3 requirements are consistent with those stated in the CTS. This change is designated as administrative because it does not result in technical changes to the CTS.</p> | None | 3.9.8.2, Action c |
| 3.9.6 A.5 | <p>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. This changes the CTS by eliminating the requirement to suspend operations involving an increase in reactor decay heat load.</p> <p>This change is acceptable because the requirements have not changed. The reactor decay heat load is generated by irradiated fuel. The only method of increasing the decay head load of a reactor in MODE 6 is to load additional irradiated fuel assemblies into the core. However, ITS LCO 3.9.7 prohibits loading of fuel assemblies into the reactor when the water level is less than 23 feet. Therefore, when LCO 3.9.6 is applicable, there is no method available to increase the reactor decay heat load and the requirement can be deleted with no effect on plant operations. This change is designated as administrative because it does not result in technical changes to the CTS.</p> | 3.9.6 Actions | 3.9.8.2, Action b |

Table A – Administrative Changes
ITS Section 3.9 – Refueling Operations

| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|-----------|---|------------------------|---------------------------|
| 3.9.7 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | None | Various |
| 3.9.7 A.2 | <p>CTS 3.9.10.1 Action contains the statement, "The provisions of Specification 3.0.3 are not applicable." ITS 3.9.7 does not contain an equivalent statement.</p> <p>This change is acceptable because the technical requirements have not changed. ITS LCO 3.0.3 is not applicable in MODE 6. Therefore, the LCO 3.0.3 exception is not needed. This change is designated as administrative because the technical requirements of the specifications have not changed.</p> | None | 3.9.10.1 |
| 3.9.7 A.3 | <p>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 "MODE 6" portion of the applicability. Qualification of irradiated fuel vice fuel is discussed in DOC L.1.</p> <p>This change is acceptable because the technical requirements have not changed. Fuel movement in the containment only occurs in MODE 6. Therefore, specifying MODE 6 during movement of fuel is unnecessary. This change is designated as administrative because the technical requirements of the specifications have not changed.</p> | 3.9.7 Applicability | 3.9.10.1 Applicability |

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 |

Rev. 4

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 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 3.9.5-4 Note | None | 1 |

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- 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, 4.6.3.1.2.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 |

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- 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 A – Administrative Changes
ITS Section 4.0 – Design Features

| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---------|---|-----------------|-----------------|
| 4.0 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | Various | Various |
| 4.0 A.2 | <p>CTS 5.6.1.3 contains requirements on storing new fuel for the first core dry in the spent fuel pool storage racks. The ITS does not contain this information.</p> <p>This change is acceptable because the requirements are no longer relevant. The North Anna reactors have loaded their first cores and the spent fuel pool is filled with water. These requirements will not be used again. This change is designated as administrative because it eliminates one-time requirements which no longer apply.</p> | None | 5.6.1.3 |
| 4.0 A.3 | <p>ITS 4.1 contains a description of the site location. The CTS does not contain this information.</p> <p>This change is acceptable because it does not add, delete, or modify any requirements. This change is designated administrative because it does not result in a technical change to the specifications</p> | 4.1 | None |

EDITORIAL

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 $K_{eff} \leq 0.9995$ if fully flooded with unborated water. The CTS does not contain this information. | 4.3.1.2.b | None |

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Table A – Administrative Changes
ITS Section 5.0 – Administrative Controls

| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---------|--|-----------------|---------------------|
| 5.0 A.1 | <p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p> | Various | Various |
| 5.0 A.2 | <p>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).</p> <p>The purpose of CTS Table 6.2-1 is to specify the minimum shift crew composition consistent with 10 CFR (m)(2)(i). This change is acceptable because 10 CFR 50.54 (m)(2)(ii) already states this required composition. This change is designated administrative because it does not result in technical changes to the CTS.</p> | None | Table 6.2-1 |
| 5.0 A.3 | <p>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. 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.</p> <p>This change is acceptable because the recommendations of Regulatory Guide 1.33, Revision 2, Appendix A, February 1978 already require procedures for refueling operations and for surveillance tests for safety related activities. This change is designated administrative because it does not result in technical changes to the CTS.</p> | 5.4.1.a | 6.8.1.b and 6.8.1.c |

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| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---------|---|-----------------|---------------------|
| 5.0 A.4 | <p>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.</p> <p>This change is acceptable because the requirements for implementation of the Security and Emergency Plans are contained in 10 CFR 50.54(p) and 10 CFR 50.54(q). This change is designated administrative because it does not result in technical changes to the CTS.</p> | None | 6.8.1d and 6.8.1.e |
| 5.0 A.5 | <p>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.</p> <p>The purpose of CTS 4.7.7.1 and 4.7.8.1 is to specify the Surveillance Requirements for the 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 change is acceptable because it retains existing ventilation testing requirements in a single program in the ITS. This change is designated administrative because it does not result in technical changes to the CTS.</p> | 5.5.10 | 4.7.7.1 and 4.7.8.1 |
| 5.0 A.6 | <p>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.</p> <p>This change is acceptable because a person with an SRO license is always allowed to assume the Control Room command function. The CTS and ITS allowance to use an RO is an exception to that requirement. This change is designated administrative because it does not result in technical changes to the CTS</p> | 5.1.2 | Table 6.2-1 |

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| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---------|--|-----------------|-----------------|
| 5.0 A.7 | <p>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.</p> <p>This change is acceptable because the added phrase retains an existing allowance, and is only required because of the change in format from CTS to ITS. This change is designated administrative because it does not result in technical changes to the CTS.</p> | 5.5.8 | 3.4.5 |
| 5.0 A.8 | <p>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.</p> <p>This change is acceptable because the requirements of 10 CFR Part 20 are already required to be met. This change is designated administrative because it does not result in technical changes to the CTS.</p> | None | 6.11 |
| 5.0 A.9 | <p>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).</p> <p>The purpose of CTS 6.2.2.d is to ensure the presence of a licensed SRO or licensed SRO limited for fuel handling who has no other concurrent responsibilities during this operation. This change is acceptable because it is a duplication of 10 CFR 50.54 (m)(2)(iv), and the requirement is retained, but not in the ITS. This change is designated administrative because it does not result in technical changes to the CTS.</p> | None | 6.2.2.d |

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| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|----------|--|-----------------|---------------------------------------|
| 5.0 A.10 | <p>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."</p> <p>This change is acceptable because the same containment leakage rate requirements are being applied, but as a program in ITS 5.5.15 instead of individual LCOs and Surveillance Requirements. This change is designated administrative because it does not result in technical changes to the CTS.</p> | 5.5.15 | 4.6.1.1, 4.6.1.2, 3.6.1.3 and 4.6.1.3 |
| 5.0 A.11 | <p>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.</p> <p>This change is acceptable because referenced requirement CTS 6.10.2.r was removed from the CTS by North Anna amendment 208 (Unit 1) / 189 (Unit 2). This change is designated administrative because it does not result in technical changes to the CTS.</p> | 5.5.1 | 6.15 |
| 5.0 A.12 | <p>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.</p> <p>This change is acceptable because the acronyms are adequately defined where appropriate in ITS 5.0, and it is not necessary to have a consolidated list. This change is designated administrative because it does not result in technical changes to the CTS.</p> | 5.0 | Table 6.2-1 |
| 5.0 A.13 | <p>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."</p> <p>The purpose of CTS 4.0.5.b is to specify the required frequencies for performing inservice testing activities associated with ASME Boiler and Pressure Vessel Code. This change is acceptable because it adds the ASME Boiler and Pressure Vessel Code biennial or every 2 years frequency of "biennially or every 2 years" without adding any new requirements. This change is designated administrative because it does not result in technical changes to the CTS.</p> | 5.5.7 | 4.0.5.b |

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| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|----------|---|-----------------|-----------------------|
| 5.0 A.14 | <p>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.</p> <p>This change is acceptable because the distribution of written communications to the NRC is governed by 10 CFR 50.4, and duplication in the Technical Specifications is unnecessary. This change is designated administrative because it does not result in technical changes to the CTS.</p> | None | 6.9.1.6 and 6.9.1.7.d |
| 5.0 A.15 | <p>Unit 1 CTS Table 4.4-2, Steam Generator Tube Inspection, 2nd Sample Inspection, Additional SG is C-3, Action Required includes, “Report to NRC...” Unit 2 CTS Table 4.19-2, Steam Generator Tube Inspection, 1st Sample Inspection, C-3 result, and 2nd 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.</p> <p>This change is acceptable because a duplicate reporting requirement is deleted that is addressed by other Technical Specifications. This change is designated administrative because it does not result in technical changes to the CTS.</p> | 5.6.7.c | Table 4.4-2 |

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| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|----------|--|-----------------|---------------------|
| 5.0 A.16 | <p>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.</p> <p>The purpose of the CTS 4.6.1.2 and CTS 4.6.1.3 statements that the provisions of Specification 4.0.2 are not applicable is to require the testing frequencies for containment and containment penetrations to remain 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 NRC and industry position is that Section 3.0 does not apply to Section 5.0. The statement, "Nothing in these Technical Specifications shall be construed to modify the testing Frequencies required by 10 CFR 50, Appendix J," was added to avoid any possible confusion. Therefore, the requirements of CTS 4.0.2 continue to not be applicable to the containment and containment penetration leakage testing requirements, but the format is changed to accommodate moving the testing requirements to Section 5.0. This change is designated administrative because it does not result in technical changes to the CTS.</p> | None | 4.6.1.2 and 4.6.1.3 |
| 5.0 A.17 | <p>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.</p> <p>This change is acceptable because it clarifies that entry and exit through these barriers is allowed under specified controls, as is the case in the CTS. This change is designated administrative because it does not result in technical changes to the CTS</p> | 5.7.2.a.2 | None |

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| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|----------|---|-----------------|--|
| 5.0 A.18 | <p>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.</p> <p>This change is acceptable because the added phrase retains existing allowances, and is only required because of the change in format from the CTS to the ITS. This change is designated administrative because it does not result in technical changes to the CTS.</p> | 5.5.11 | 3.11.1 and 3.11.2 |
| 5.0 A.19 | <p>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.</p> <p>This change is acceptable because the reporting requirements of 10 CFR 50.73 are still required without a reference in the ITS. This change is designated administrative because it does not result in technical changes to the CTS.</p> | None | 6.6.1 |
| 5.0 A.20 | <p>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.</p> <p>This change is acceptable because it makes appropriate reference changes for the ITS. This change is designated administrative because it does not result in technical changes to the CTS.</p> | 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 | <p>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.</p> <p>This change is acceptable because the 10 CFR Part 50 requirements are still applicable and referencing them separately is unnecessary. This change is designated administrative because it does not result in technical changes to the CTS.</p> | None | 4.0.5 |

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| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|----------|---|-----------------|------------------|
| 5.0 A.22 | <p>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.</p> <p>This change is acceptable because it deletes a reference to a requirement that has it’s own criteria for application, regardless of the reference. This change is designated administrative because it does not result in technical changes to the CTS.</p> | None | 4.4.10.1 |
| 5.0 A.23 | <p>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.</p> <p>This change is acceptable because it retains existing allowances by transferring them into ITS format. This change is designated administrative because it does not result in technical changes to the CTS.</p> | 5.5.10 | 4.7.7. and 4.7.8 |
| 5.0 A.24 | <p>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.</p> <p>This change is acceptable because the reporting requirements are already established in 10 CFR 50.4, and do not need to be repeated in the ITS. This change is designated administrative because it does not result in technical changes to the CTS.</p> | None | 6.9.1 |
| 5.0 A.25 | <p>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.</p> <p>This change is acceptable because the one time report requirement has already been met and no longer needs to be specified. This change is designated administrative because it does not result in technical changes to the CTS.</p> | None | 6.9.1.4 |
| 5.0 A.26 | Not used. | N/A | N/A |

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| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|----------|--|-------------------|---------------------|
| 5.0 A.27 | <p>CTS 6.9.1.7.e.2f, References for the Core Operating Limits Report, states, “WCAP-12610, “VANTAGE+FUEL ASSEMBLY REPORT,” June 1990 (W 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 (W Proprietary),” see DOC LA.9.</p> <p>This change is acceptable because it corrects the title of a reference used, without changing the reference. This change is designated administrative because it does not result in technical changes to the CTS</p> | 5.6.5.b.7 | 6.9.1.7.e.2f |
| 5.0 A.28 | <p>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.</p> <p>This change is acceptable because the individual assigned to the responsibilities described still carries out the same tasks. The support provided is for the benefit of the unit operations shift crew, as well as the Shift Supervisor. This change clarifies that the assigned individual may provide the support directly to the Shift Supervisor or other members of the unit operations shift crew, but the result will be support for the crew as a whole in either case. This change is designated administrative because it does not result in technical changes to the CTS.</p> | 5.2.2.f and 5.3.1 | 6.2.4.1 and 6.3.1.2 |

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| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|----------|--|-----------------|-----------------|
| 5.0 A.29 | <p>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.</p> <p>This change is acceptable because the individual assigned to the responsibilities described still carries out the same tasks. The support provided is for the benefit of the unit operations shift crew, as well as the Shift Supervisor. This change clarifies that the assigned individual may provide the support directly to the Shift Supervisor or other members of the unit operations shift crew, but the result will be support for the crew as a whole in either case. This change is designated administrative because it does not result in technical changes to the CTS.</p> | 5.3.2 | None |
| 5.0 A.30 | <p>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.</p> <p>This change is acceptable because it clarifies which regulatory requirement is referenced for meeting the Technical Specification requirement, but does not change the requirement. This change is designated administrative because it does not result in technical changes to the CTS.</p> | 5.5.4.b | 6.8.4.e.2 |

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| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|----------|--|-----------------|-------------------|
| 5.0 A.31 | <p>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.</p> <p>These changes are acceptable because the 100 mrem/hr definition for a high radiation area is already addressed by 10 CFR 20.1003, and the method of measuring the 1000 mrem/hr is clarified in terms of being measured from a point source and from a surface. This change is designated administrative because it does not result in technical changes to the CTS.</p> | 5.7.1 and 5.7.2 | 6.12.1 and 6.12.2 |
| 5.0 A.32 | <p>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.</p> <p>This change is acceptable because the inservice inspection and testing activities are still required by 10 CFR 50.55a, as appropriate, and ITS 5.5.7, the Inservice Testing Program. A specific reference to this fact is unnecessary. This change is designated administrative because it does not result in technical changes to the CTS.</p> | None | 4.0.5.d |
| 5.0 A.33 | <p>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.</p> <p>This change is acceptable because the inservice inspection and testing activities are still required by 10 CFR 50.55a, as appropriate, and ITS 5.5.7, the Inservice Testing Program. A specific reference to this fact is unnecessary. This change is designated administrative because it does not result in technical changes to the CTS.</p> | None | 6.9.2 |

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| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|----------|--|-----------------|-----------------|
| 5.0 A.34 | <p>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.</p> <p>10 CFR 50.54 (m)(2)(iii) states, “When a nuclear power unit is in an operational mode other than cold shutdown or refueling, as defined by a unit’s technical specifications, each licensee shall have a person holding a senior operator license for the nuclear power unit in the control room at all times.” 10 CFR 50.54(k) states, “An operator or senior operator licensed pursuant to part 55 of this chapter shall be present at the controls at all times during operation of the facility.” This change is acceptable because the requirements deleted from the Technical Specifications are already required by 10 CFR 50.54. This change is designated administrative because it does not result in technical changes to the CTS.</p> | None | 6.2.2.b |
| 5.0 A.35 | <p>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.</p> <p>This change is acceptable because the intent of CTS 6.8.4(v) is to provide procedures for what to do when the control point chemistry conditions are not within limits, which is more accurately stated using the term “off control point.” This change clarifies an existing requirement. This change is designated administrative because it does not result in technical changes to the CTS.</p> | 5.5.9.e | 6.8.4.c(v) |
| 5.0 A.36 | <p>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.</p> <p>This change is acceptable because it retains the allowance in CTS 4.0.2, which must be explicitly stated for it to apply to a requirement in ITS Section 5.0. This change is designated administrative because it does not result in technical changes to the CTS.</p> | 5.5.15.e | 4.0.2 |

Table A – Administrative Changes
ITS Section 5.0 – Administrative Controls

| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|----------|---|-----------------|-----------------|
| 5.0 A.37 | <p>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.</p> <p>This change is acceptable because it administratively documents changes made to other parts of the CTS and the COLR. This change is designated administrative because it does not result in technical changes to the CTS.</p> | 5.6.5.a | 6.9.1.7.a |
| 5.0 A.38 | <p>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.</p> <p>This change is acceptable because it administratively documents changes made to other parts of the CTS and the COLR. This change is designated administrative because it does not result in technical changes to the CTS.</p> | 5.5.8 | None |

Table A – Administrative Changes
ITS Section 5.0 – Administrative Controls

| DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|----------|--|-----------------|-----------------|
| 5.0 A.39 | <p>CTS 4.0.5.b refers to Section XI and ASME, Boiler and Pressure Vessel Code." ITS 5.5.7 refers to the "ASME Code for Operation and Maintenance of Nuclear Power Plants" and does not reference Section XI. This changes the CTS by revising the title of the applicable ASME Code for the Inservice Testing Program to match the currently approved version.</p> <p>This change is acceptable because North Anna has adopted the ASME Code for Operation and Maintenance of Nuclear Power Plants, the 1995 Edition and the 1996 Addenda, as required by 10 CFR 50.55a(b)(3). This version of the Code does not use Section XI for the Inservice Testing Program and is called the "ASME Code for Operation and Maintenance of Nuclear Power Plants" instead of the "ASME, Boiler and Pressure Vessel Code." This change is designated administrative because it does not result in technical changes to the CTS.</p> | 5.5.7 | 4.0.5.b |

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 |
| 5.0 L.36 | 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 ITS does not contain this requirement. This changes the CTS by eliminating the Technical Specifications requirement for visual inspection of the steam generator supports. | N/A | 4.4.10.1.2 | 5 |

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- 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.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 |
| 5.0 M.25 | ITS 5.6.5.b contains two analytical methods, WCAP-8745-P-A and WCAP-14483-A, which do not appear in the CTS. This changes the CTS by adding two analytical methods to those referenced in the Technical Specifications. | 5.6.5.b | None |
| 5.0 M.26 | ITS 5.5.10.e requires testing of MCR/ESGR EVS heaters to verify they dissipate the required wattage. The CTS does not contain this requirement. This changes the CTS by adding a Surveillance Requirement. | 5.5.10.e | None |

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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 AS72 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. DELETED | 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 |

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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

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.