

## TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

### ITS SECTION 1.0 - USE AND APPLICATION

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
L.1	Allows use of Table E-7 of Regulatory Guide 1.109 or ICRP 30, Supplement to Part 1, in addition to Table III of TID-14844 for thyroid dose conversion factors used in analysis of potential offsite doses.	1.14	1.1	
L.2	Increases the power level where Mode 1 LCOs become applicable from 2% RTP to 5% RTP.	1.2.4	1.1 T 1.1-1	V
L.3	Revises definition of E (bar) (i.e., Average Disintegration Energy) to exclude I-135 and include tritium when calculating of E-Bar and when measuring gross specific activity.	3.1.D.1 T 4.1-1, No.1	1.1 3.4.16.1 SR	

# TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

## ITS SECTION 2.0 - SAFETY LIMITS (SLs)

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
L.1	<p>Deletes statement that 10 CFR 50.36(c)(1)(i) requirements must be met following a Safety Limit violation.</p> <p>Deletes specific details for internal IP2 reviews of Licensee Event Reports prior to the submittal to the NRC.</p>	<p>6.7.1.a 6.7.1.b 6.7.1.c 6.7.1.d</p>	2.2	VI

**TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS**  
**ITS SECTION 3.0 - LCO APPLICABILITY AND SR APPLICABILITY**

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
L.1	Permits restoration of inoperable equipment to an operable status to demonstrate the Operability of the equipment being returned to service or to demonstrate that other equipment or variables are within limits.	3.0	3.0.5 LCO 3.0.2 LCO	V
L.2	Permits an increase in the time allowed to complete a missed surveillance, from a maximum of 24 hours, up to a maximum period equal to the specified surveillance interval.	4.0.2	3.0.3 SR	III

**TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS**

**ITS SECTION 3.1 – REACTIVITY CONTROL SYSTEMS**

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
<b>ITS SECTION 3.1.1- SHUTDOWN MARGIN (SDM)</b>				
L.1	Deletes requirement for verification of reactor coolant system boron concentration twice per week the new requirement in ITS SR 3.1.1.1 for verification of shutdown margin every 24 hours when shutdown and the requirements in ITS SR 3.1.5.1 and ITS SR 3.1.6.2 for verification of rod insertion limits every 12 hours will ensure that boron concentration is verified within required limits more frequently than the CTS requirement.	T 4.1-2, No.2	3.1.1.1 SR 3.1.5.1 SR 3.1.6.2 SR 3.9.1.1 SR	II
<b>ITS SECTION 3.1.2 - CORE REACTIVITY</b>				
	NONE			
<b>ITS SECTION 3.1.3 - MODERATOR TEMPERATURE COEFFICIENT (MTC)</b>				
L.1	Allows 24 hours to restore MTC within required limits by inserting control banks until MTC is within required limit.	3.1.C.1	3.1.3 RA-A.1 3.1.3 RA-B.1	III
<b>ITS SECTION 3.1.4 - ROD GROUP ALIGNMENT LIMITS</b>				
L.1	Allows 72 hours to verify that a misaligned rod has not resulted in exceeding power distribution limits because ITS LCO 3.1.4, Required Action B.2.2, requires that reactor power be reduced within 2 hours.	3.10.5.1.a 3.10.5.1.b 3.10.5.2	3.1.4 RA-B.2.2 3.1.4 RA-B.2.4 3.1.4 RA-B.2.5	III
L.2	Requires a reduction in reactor power (but not a reduction in the high flux trip setpoint) within 2 hours when a rod is not within required alignment limits.	3.10.5.2	3.1.4 RA-B.2.2	IV

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
L.3	Superceded by CTS Amendment 217.	NA	NA	
L.4	Superceded by CTS Amendment 234.	NA	NA	
L.5	Superceded by CTS Amendment 234.	NA	NA	
<b>ITS SECTION 3.1.5 - SHUTDOWN BANK INSERTION LIMITS</b>				
L.1	Deletes a statement that SDM requirements must be met during the surveillance for periodic exercise of individual rods because the impact on SDM of moving individual or small groups of control rods by 10 steps is small, the SR is performed infrequently (92 days), and the duration of the test is short.	3.10.1 3.10.4.4	3.1.5 LCO 3.1.4.2 SR 3.1.5 RA-A.1.1 3.1.5 RA-A.1.2	II
<b>ITS SECTION 3.1.6 - CONTROL BANK INSERTION LIMITS</b>				
L.1	Deletes a statement that SDM requirements must be met during the surveillance for during periodic exercise of individual rods because the impact on SDM of moving individual or small groups of control rods by 10 steps is small, the SR is performed infrequently (92 days), and the duration of the test is short.	3.10.1 3.10.4.4	3.1.6 LCO 3.1.4.2 SR 3.1.6 APP	II
<b>ITS SECTION 3.1.7 - ROD POSITION INDICATION</b>				
L.1	Allows more than one IRPI channel per bank to be inoperable for 24 hours if rod control is placed in manual and reactor coolant system temperature is verified every hour.	3.10.6.2	3.1.7 RA-A.1 3.1.7 RA-A.2 3.1.7 RA-B.1 3.1.7 RA-B.2 3.1.7 RA-B.3 3.1.7 RA-B.4	IV
L.2	Establishes Required Actions allowing continued plant operation if one or more banks of the rod Demand Position Indication System are not Operable in Modes 1 and 2.	3.10.6 3.10.5.1	3.1.7 RA-D.1.1 3.1.7 RA-D.1.2	IV

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
			3.1.7 RA-D.2	
L.3	Allows 12 hours to verify rod position using incore detectors or to reduce power to less than 50% power without taking any other compensatory action when one IRPI per group in one or more groups is inoperable.	3.10.6.1.b	3.1.7 RA-A.2 3.1.7 RA-C.1 3.1.7 RA-C.2	IV
<b>ITS SECTION 3.1.8 - PHYSICS TEST EXCEPTIONS - MODE 2</b>				
	NONE			

**TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS**

**ITS SECTION 3.2 - POWER DISTRIBUTION LIMITS**

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
<b>ITS SECTION 3.2.1 - HEAT FLUX HOT CHANNEL FACTOR (<math>F_Q(Z)</math>)</b>				
L.1	Extends the completion time for a proportional reduction of the high neutron flux trip setpoint whenever a hot channel factor exceeds its specified limit from the several hours that would be needed to perform the required adjustment of setpoints under CTS to the 72 hours allowed by ITS.	3.10.2.2.2	3.2.1 RA-A.2	III
L.2	Relaxes requirement for performing a flux map after a determination that hot channel factors were exceeded so performing a flux map is required only as a prerequisite before increasing thermal power above the limit imposed when hot channel factors were exceeded.	3.10.2.2.2	3.2.1 RA-A.1 3.2.1 RA-A.2 3.2.1 RA-A.3 3.2.1 RA-A.4	IV
L.3	Adds an explicit requirement that the plant be placed in a condition where the LCO does not apply within a reasonable period of time if the Actions or Completion Times are not met when $F_Q(Z)$ limits are exceeded.	3.10.2.2.2 3.0.1	3.2.1 RA-B.1	III
L.4	Relaxes Applicability requirements for peaking factors ( $F_Q(Z)$ ) from "at all times" to only when in Mode 1 because in other Modes there is either insufficient stored energy in the fuel or insufficient energy being transferred to the reactor coolant to require a limit on the distribution of core power.	3.10.2.1	3.2.1 APP	I
<b>ITS SECTION 3.2.2 - NUCLEAR ENTHALPY RISE HOT CHANNEL FACTOR (<math>F_{\Delta H}^N</math>)</b>				
L.1	Eliminates CTS requirement for a reactor shutdown if $F_N \Delta H$ is not restored to within limits by a reduction to 50% RTP; ITS only requires that the plant be placed outside the LCO Applicability.	3.10.2.2.2	3.2.2 RA-A.1.2.1 3.2.2 RA-A.1.2.2 3.2.2 RA-A.2 3.2.2 RA-B.1	IV

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
L.2	Relaxes Applicability requirements for peaking factor, Nuclear Enthalpy Rise Hot Channel Factor (FN delta H), from "at all times" to only when in Mode 1 because in other Modes is not required because there is either insufficient stored energy in the fuel or insufficient energy being transferred to the reactor coolant to require a limit on the distribution of core power.	3.10.2.1	3.2.2 APP	I
<b>ITS SECTION 3.2.3 - AXIAL FLUX DIFFERENCE (AFD)</b>				
L.1	Allows use of design predictions for target flux difference during the first 31 EFPDs following refueling (i.e., target flux difference is not determined using a flux map until 31 EFPDs following refueling).	3.10.2.3	3.2.3.3 SR	II
L.2	Eliminates the requirement for a reduction in the high flux trip setpoint in conjunction with a required reduction in reactor power after a determination that AFD is not within the specified limit.	3.10.2.6.2	3.2.3 RA-C.1	IV
L.3	Eliminates requirement to accumulate AFD penalties when < 15% RTP.	3.10.2 3.10.2.7 3.10.2.7.2	3.2.3 APP 3.2.3 LCO 3.2.3 RA-C.1	V
<b>ITS SPECIFICATION 3.2.4 - QUADRANT POWER TILT RATIO (QPTR)</b>				
L.1	Eliminates the requirement for a proportional reduction in the high flux trip setpoint in conjunction with a required reduction in reactor power after a determination that QPTR is not within the specified limit.	3.10.3.1.a	3.2.4 RA-A.1	V
L.2	Eliminates requirement to reduce power < 50% RTP if QPTR exceeds 1.09 because the requirement for power reduction of 3% RTP for each 1% by which the QPTR exceeds 1.00 provides a very high degree of assurance that the quadrant power tilt is not causing any area of the core to exceed a thermal limit.	3.10.3.1 3.10.3.2	3.2.4 RA-A.1	IV



Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
L.3	Eliminates requirement (in CTS Bases) to use “full-core physics map utilizing the movable detector system” (i.e., allows use of excore detectors) to verify QPTR is within limits following a power reduction that was required to compensate for QPTR not within required limits.	3.10.3.1.a 3.10.3.1.b	3.2.4 RA-A.2 3.2.4.1 SR	IV
L.4	Establishes a process that allows returning to 100% RTP following a power reduction that was required to compensate for QPTR not within required limits.	3.10.3.1.a	3.2.4 RA-A.4 3.2.4 RA-A.5 3.2.4 RA-A.6	IV
L.5	Extends time allowed to reduce power to < 50% RTP when QPTR limits are exceeded and associated Actions or completion times are not met from 2 hours to 4 hours.	3.10.3.1.b	3.2.4 RA-B.1	III

**TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS**  
**ITS SECTION 3.3- INSTRUMENTATION**

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
<b>ITS SPECIFICATION 3.3.1- REACTOR PROTECTION SYSTEM (RPS) INSTRUMENTATION</b>				
L.1	Not Used	NA	NA	
L.2	Not Used.	NA	NA	
L.3	Superceded by Amendment 212.	NA	NA	
L.4	Eliminates the requirement for ITS 3.3.1, Function 3, Intermediate Range Neutron Flux, to be Operable when below the P-6 interlock setpoint (i.e., when the source range trip is required to be Operable).	T 3.5-2, No.3	T 3.3.1-1 No. 3	V
L.5	Eliminates requirement that the Channel Operational Test for the Source Range (SRM) and Intermediate Range (IRM) Trip be performed within 7 days prior to a reactor startup if the Surveillance has been performed within the Frequency justified by WCAP-15376 if both SRM or IRM channels are Operable; however, if only 1 IRM or SRM channel is Operable (as permitted by CTS Table 3.5-2, Function 4, and ITS Table 3.3.1-1, Functions 3 and 4), the allowance provided by WCAP-15376 does not apply and the required Surveillance Frequency remains at 7 days.	T 4.1-1, No.2 T 4.1-1, No.3	3.3.1.8 SR 3.3.1.7 SR T 3.3.1-1 No. 3 T 3.3.1-1 No. 4	II
L.6	<b>Increases</b> Surveillance Frequency for comparing the AFD as determined by the incore detectors and the AFD as determined by the NIS channel from monthly to every 31 effective full power days.	T 4.1-1, No.1	3.3.1.3 SR	II
L.7	Allows 48 hours to restore the inoperable undervoltage or shunt trip mechanism for a reactor trip breaker to operable before requiring the actions for a loss of reactor trip capability.	T 3.5-2, No.19	3.3.1 RA-C.1 3.3.1 RA-S.1	III

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
L.8	Allows 48 hours to restore an inoperable RTB when in Modes 3, 4 or 5 when the rod control system is capable of rod withdrawal or if one or more rods are not fully inserted.	T 3.5-2, No.19	3.3.1 RA-C.1 3.3.1 RA-C.2.1	III
L.9	Decreases Surveillance Frequency for the comparison of the upper and lower axial offset from monthly to every 92 effective full power days.	T 4.1-1, No.1	3.3.1.6 SR	II
L.10	Establishes an explicit delay in SRs for comparing heat balance calibrations to nuclear instrument output, comparing incore detector measurements to NIS AFD, and comparing incore and excore detectors of the Nuclear instruments to allow minimum plant conditions to be established for performing the SR and sufficient time to complete the SR once minimum conditions are met.	T 4.1-1, No.1	3.3.1.2 SR 3.3.1.3 SR 3.3.1.6 SR	II
L.11	Increases the Completion Times for restoring an inoperable Reactor Trip Breaker (RTB) train from 1 hour to 24 and establishes a 4 hour limit on the amount of time that an RTB train may be bypassed for Surveillance Testing consistent allowances justified in WCAP-15376-P-A, Rev.0, Risk Informed Assessment of RTS and ESFAS Surveillance Test Intervals and Reactor Trip Breaker Test and Completion Times, as implemented by TSTF-411, Rev.1.	1.5 3.5.3 T 3.5-2, No.19	3.3.1 RA-P.1	III
L.12	Increases required Surveillance test frequencies for RPS as follows: Channel Operational Test Frequency is increased from 92 days to 184 days; Actuation Logic Test Frequency is increased from 31 to 92 days on a staggered test basis; and Trip Actuating Device Operational Test Frequency is increased from 31 to 62 days on a staggered test basis. These changes are consistent allowances justified in WCAP-15376-P-A, Rev.0, Risk Informed Assessment of RTS and ESFAS Surveillance Test Intervals and Reactor Trip Breaker Test and Completion Times, as implemented by TSTF-411, Rev.1.	3.5 4.1	3.3.1	II
<b>ITS SPECIFICATION 3.3.2 - ENGINEERED SAFETY FEATURE ACTUATION SYSTEM (ESFAS) INSTRUMENTATION</b>				
L.1	Not Used	NA	NA	
L.2	Not Used.	NA	NA	

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## Section 3.3

### Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
L.3	Not Used.	NA	NA	
L.4	<p>Changes Applicability and Required Actions to eliminate Mode 4 requirements for the following ESFAS functions:</p> <p>ITS 3.3.2, Function 1.c, Safety Injection-Containment Pressure-High;  ITS 3.3.2, Function 1.e. Safety Injection-High Differential Pressure Between Steam Lines;  ITS 3.3.2, Function 1.f. Safety Injection - High Steam Flow in Two Steam Lines Coincident with Tave - Low;  ITS 3.3.2, Function 2.c, Containment Spray - Containment Pressure (High-High);  ITS 3.3.2, Function 3.b.(3), Containment Phase B Isolation-Containment Pressure (High-High);  ITS 3.3.2, Function 4.a Steam Line Isolation-Manual Initiation;  ITS 3.3.2, Function 4.b, Steam Line Isolation-Automatic Actuation Logic and Actuation Relays;  ITS 3.3.2, Function 4.c, Steam Line Isolation - Containment Pressure (High-High);  ITS 3.3.2, Function 4.d. Steam Line Isolation - High Steam Flow in Two Steam Lines Coincident with Tave - Low;  ITS 3.3.2, Function 4.e. Steam Line Isolation - High Steam Flow in Two Steam Lines Coincident with Steam Line Pressure - Low;  ITS 3.3.2, Function 5.a, Feedwater Isolation-Automatic Actuation Logic and Actuation Relays; and  ITS 3.3.2, Function 6.a, Auxiliary Feedwater-Automatic Actuation Logic and Actuation Relays.</p>	3.5.1	3.3.2 3.3.6	I, IV
L.5	Not Used	NA	NA	
L.6	<p>Changes required Surveillance test frequencies for ESFAS as follows:  Channel Operational Test Frequency is increased from 92 days to 184 days;  Actuation Logic Test Frequency is increased from 31 to 92 days on a staggered test basis. These changes are consistent allowances justified in WCAP-15376-P-A, Rev.0, Risk Informed Assessment of RTS and ESFAS Surveillance Test Intervals and Reactor Trip Breaker Test and Completion Times, as implemented by TSTF-411, Rev.1.</p>	3.5	3.3.2	II

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## Section 3.3

### Categories for L-Table

I - Relaxation of Modes of Applicability  
II - Relaxation of Surveillance Requirement  
III - Relaxation of Completion Time

IV - Relaxation of Required Actions  
V - Relaxation of LCO  
VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
<b>ITS SPECIFICATION 3.3.3 - POST ACCIDENT MONITORING (PAM) INSTRUMENTATION</b>				
L.1	Extends the amount of time that one of the two required Channels of Containment Hydrogen Concentration Monitor may be inoperable before a report to the NRC must be initiated from 7 days to 30 days and eliminates the explicit requirement for initiation of alternate monitoring methods while the required monitoring channel is inoperable.	T 3.5-5, No.11 T 3.5-5, Action 3	3.3.3, Function 10 3.3.3 RA-A.1	III
L.2	Reduces the number of Containment Pressure (narrow range) channels needed to satisfy Reg. Guide 1.97 requirements for Post Accident Monitoring from 6 channels to 2 channels.	T 3.5-5 T 3.5-3	3.3.3, Function 7 3.3.3, Function 8	V
L.3	Reduces the number of Core Exit Temperature (CETs) needed to satisfy Reg. Guide 1.97 requirements for Post Accident Monitoring from 65 channels to 2 CETs per train (i.e., 4 CETs total) in each of the four quadrants.	T 3.5-5	3.3.3, Function 15 3.3.3, Function 16 3.3.3, Function 17 3.3.3, Function 18	V
L.4	Increases the required channel Check Frequency of the Reg. Guide 1.97 Post Accident Monitoring portion of the RWST Level indication from weekly to every 31 days.	T 4.1-1, No.15 3.3.A.1.k	3.3.3.1 SR 3.5.4.4 SR 3.3.2	II
L.5	Increases the required Frequency for Channel Checks of the Post Accident Monitoring Function High Range Containment Radiation Monitor (R-25, R-26) from every 12 hours to every 31 days.	T 4.1-1, No.40	3.3.3.1 SR	II
L.6	Deletes requirement that "steam tables are continuously maintained in the control room" and "the subcooling margin is determined and recorded once a shift" during the 30 day allowable out of service time when the Reactor Coolant System Subcooling Margin Monitor function is inoperable.	T 3.5-5, No.2 T 3.5-5, Action1 T 3.5-5, Action 2	3.3.3, Function 21	IV
<b>ITS SECTION 3.3.4 – REMOTE SHUTDOWN</b>				
	NONE			

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
<b>ITS SPECIFICATION 3.3.5 - LOSS OF POWER (LOP) DIESEL GENERATOR (DG) START INSTRUMENTATION</b>				
L.1	Not Used	NA	NA	
L.2	Revises Required Action for a loss of the undervoltage function on one or more buses from a requirement for an immediate reactor shutdown to a requirement to declare the associated DGs inoperable because the impact of a loss of the undervoltage function on a 480 V bus is the loss of automatic start capability for the associated DG.	T3.5-3, No.3a	3.3.5 3.3.2 RA-H.1	IV
<b>ITS SPECIFICATION 3.3.6 - CONTAINMENT PURGE SYSTEM AND PRESSURE RELIEF LINE ISOLATION INSTRUMENTATION</b>				
L.1	Eliminates Technical Specification requirements for Containment Purge System and Pressure Relief Line Isolation instrumentation during refueling operations except during movement of recently irradiated fuel within the containment with the term "recently" defined in the ITS Bases as fuel assemblies that has been part of a critical reactor in the previous 100 hours. These relaxations were evaluated and accepted by the NRC based on an evaluation documented in the Safety Evaluation Report (SER) by the Office of Nuclear Reactor Regulation Related to Amendment No. 211 to Facility Operating License No. DPR-26, July 27, 2000.	3.8.A.1 3.8.B.4	3.3.6	I
L.2	Not Used.	NA	NA	
<b>ITS SECTION 3.3.7 - CONTROL ROOM VENTILATION SYSTEM (CRVS) ACTUATION INSTRUMENTATION</b>				
L.1	Deletes implied requirement that the control room ventilation system, including actuation instrumentation, must be operable whenever containment integrity is required (except during movement of irradiated fuel assemblies) based on Safety Evaluation by the Office of Nuclear Reactor Regulation Related to Amendment No. 211 to Facility Operating License No. DPR-26, July 27, 2000.	3.3.H.1	3.3.7	I
L.2	Eliminates requirement for reactor shutdown when requirements for CRVS actuation instrumentation are not met and not restored within a specified completion time the CRVS is placed in the filtered pressurization mode (i.e., the status that would result from actuation).	3.3.H.1 3.3.H.2	3.3.7 RA-A.1	IV

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Section 3.3

Categories for L-Table

I - Relaxation of Modes of Applicability  
II - Relaxation of Surveillance Requirement  
III - Relaxation of Completion Time

IV - Relaxation of Required Actions  
V - Relaxation of LCO  
VI - Relaxation of Reporting Requirement

**Categories for L-Table**

- I - Relaxation of Modes of Applicability**
- II - Relaxation of Surveillance Requirement**
- III - Relaxation of Completion Time**

- IV - Relaxation of Required Actions**
- V - Relaxation of LCO**
- VI - Relaxation of Reporting Requirement**

**TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS**

**ITS SECTION 3.4 – REACTOR COOLANT SYSTEM (RCS)**

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
<b>ITS SPECIFICATION 3.4.1 - RCS PRESSURE, TEMPERATURE, AND FLOW DEPARTURE FROM NUCLEATE BOILING (DNB) LIMITS</b>				
L.1	Allows 2 hours to restore RCS flow to the minimum value of 331,840 gpm before power reduction to Mode 2 must be initiated if the RCS minimum flow is not within limits.	3.0.1 3.1.G	3.4.1 RA-A.1	III
L.2	Allows entry into MODE 1 without having performed the 24 month verification of RCS total flow using a precession heat balance to allow placement of the unit in the best condition for performing the SR.	3.1.G T 4.1-1, No.5	3.4.1.4 SR	I
<b>ITS SPECIFICATION 3.4.2 - RCS MINIMUM TEMPERATURE FOR CRITICALITY</b>				
L.1	Eliminates the requirement that the reactor be made subcritical "by an amount greater than the potential reactivity insertion due to depressurization" and requires only that the reactor be made subcritical.	3.1.C.3	3.4.2 RA-A.1	IV
<b>ITS SPECIFICATION 3.4.3 - RCS PRESSURE AND TEMPERATURE (P/T) LIMITS</b>				
	NONE			
<b>ITS SPECIFICATION 3.4.4 - RCS LOOPS - MODES 1 AND 2</b>				
	NONE			
<b>ITS SPECIFICATION 3.4.5 - RCS LOOPS MODE 3</b>				
L.1	Allows one hour to restore the required RCS loop to operation or open the reactor trip breakers if only one of two required RCPs is operating.	T 3.1.A-1(1)	3.4.5 RA-C.1 3.4.5 RA-C.2 3.4.5 RA-D.1	III



Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
L.2	Relaxes Applicability and Required Action for having 2 RCPs in operation in Mode 3 from "reactor trip breakers open" to "Rod Control System not capable of rod withdrawal" which permits use of either RTBs in the open position or the CRDMs de-energized to eliminate the potential for an inadvertent rod withdrawal.	T 3.1.A-1(1)	3.4.5 LCO	V
L.3	Relaxes Completion Time to reduce RCS temperature < 350°F (i.e., Mode 4) to 12 hours when a required inoperable RCP is not restored to operable within the 72 hour allowable out of service time.	T 3.1.A-1(1)	3.4.5 RA-B.1	III
L.4	Allows RCS boron concentration to be reduced when there is no forced flow in the reactor as long as the coolant being injected has a boron concentration greater than the boron concentration required to meet minimum SDM requirements.	T 3.1.A-1(1)	3.4.5 LCO Note a	V
<b>ITS SPECIFICATION 3.4.6 - RCS LOOPS MODE 4</b>				
L.1	Extends the amount of time allowed to reach cold shutdown from 20 hours to 24 hours when in Mode 4 and only one RHR pump is Operable and in operation and no RCPs are Operable.	T 3.1.A-1(2)	3.4.6 RA-A.2	III
L.2	Eliminates the requirement that the plant be placed in cold shutdown within a specified time when only one RCP is Operable and in operation and no RHR pumps are Operable because this action may not be practical or possible when only one RCP is Operable and in operation and no RHR pumps are Operable. Requirement to initiate action immediately to restore redundant decay heat removal and RCS circulation capability is substituted.	T 3.1.A-1(2)	3.4.6 RA-A.1	IV
L.3	Allows RCS boron concentration to be reduced when there is no forced flow in the reactor as long as the coolant being injected has a boron concentration greater than the boron concentration required to meet minimum SDM requirements.	T 3.1.A-1(2)	3.4.6 LCO Note a	V
<b>ITS SPECIFICATION 3.4.7 - RCS LOOPS MODE 5, LOOPS FILLED</b>				
L.1	Adds Note 2 which allows one RHR loop to be inoperable for testing for a period of up to 2 hours, provided that the other RHR loop is Operable and in operation.	T 3.1.A-1(3)	3.4.7 LCO Note 2	III

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
L.2	Allows use of one RHR loop and two SGs and natural circulation as a backup to satisfy requirements for redundant decay heat removal systems in cold shutdown versus CTS requirement for two RHR loops.	T 3.1.A-1(3) T 3.1.A-1(4)	3.4.7 LCO	V
L.3	Adds Note 4 which allows both RHR loops to be removed from operation during planned heatup to Mode 4 when at least one RCS loop is in operation.	3.1.A	3.4.7 LCO Note 4	V
L.4	Eliminates requirement that RCS temperature and neutron source range are monitored hourly when the alternate means of decay heat is used (i.e., steam generators on natural circulation) because ITS allows this option only when the required operating RHR pump fails and activities involving a reduction in RCS boron concentration are prohibited when using steam generators on natural circulation for decay heat removal.	T 3.1.A-1(3) T 3.1.A-1(4)	3.4.7 LCO 3.4.7 RA-B.1 3.4.7 RA-B.2	V
L.5	Allows RCS boron concentration to be reduced when there is no forced flow in the reactor as long as the coolant being injected has a boron concentration greater than the boron concentration required to meet minimum SDM requirements.	T 3.1.A-1(4)	3.4.7 LCO Note 1a	V
<b>ITS SPECIFICATION 3.4.8 - RCS LOOPS MODE 5, LOOPS NOT FILLED</b>				
L.1	Adds ITS LCO 3.4.8, Note 2, which allows one RHR loop to be inoperable for testing for a period of up to 2 hours, provided that the other RHR loop is Operable and in operation.	3.1.A	3.4.8 LCO Note 2	V
L.2	Allows RCS boron concentration to be reduced when there is no forced flow in the reactor as long as the coolant being injected has a boron concentration greater than the boron concentration required to meet minimum SDM requirements.	T 3.1.A-1(3)	3.4.8 LCO Note 1b	V
<b>ITS SPECIFICATION 3.4.9 - PRESSURIZER</b>				
L.1	Relaxes the upper limit for pressurizer level from at "normal water level" to less than or equal to 60.6% which is the pressurizer level used as analytical limit for the initial condition in the analysis of the events that result in pressurizer insurge (e.g., loss of normal feedwater and the loss of load/turbine trip). Eliminates the implied lower limit for pressurizer level at "normal water level."	3.1.C.4 2.3	3.4.9.a LCO	V

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
<b>ITS SPECIFICATION 3.4.10 - PRESSURIZER SAFETY VALVES</b>				
	NONE			
<b>ITS SPECIFICATION 3.4.11 - PRESSURIZER POWER OPERATED RELIEF VALVES (PORVs)</b>				
	NONE			
<b>ITS SPECIFICATION 3.4.12 - LOW TEMPERATURE OVERPRESSURE PROTECTION (LTOP)</b>				
L.1	Specifies that the CTS requirement to immediately take action to place the plant in a condition where PORVs are not required means that the plant be depressurized and an appropriate size vent established within 8 hours.	3.1.A.4.b	3.4.12 RA-E.1 3.4.12 RA-E.2	III
L.2	Superceded by Amendment 224.	NA	NA	
L.3	Superceded by Amendment 224.	NA	NA	
<b>ITS SPECIFICATION 3.4.13 - RCS OPERATIONAL LEAKAGE</b>				
L.1	Provides additional 4 hours to attempt to restore primary to secondary leakage to within limits and, if unsuccessful, extends the time allowed to reach cold shutdown from 24 hours to 36 hours.	3.1.F.2.a.(1)	3.4.13 RA-A.1 3.4.13 RA-B.1 3.4.13 RA-B.2	III
L.2	Decreases frequency for verification that RCS Operational leakage is within limits using an RCS Water Inventory from once per 24 hours to once per 72 hours. Specifies that this verification is not required to be performed until after 12 hours of steady state operation because a water inventory requires steady state operation.	3.1.F.2.c.(1)(b) 3.1.F.2.c.(1)(c) 4.16.A.4	3.4.13.1 SR	II
L.3	Superceded by Amendment 226.	NA	NA	
L.4	Deletes requirement that if the reactor shutdown to investigate steam generator tube leakage and/or to plug or otherwise repair a leaking tube, then IP2 must inform the NRC before the a SG is restored to service.	3.1.F.2.(3)	3.4.13	IV

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
<b>ITS SPECIFICATION 3.4.14 - RCS PRESSURE ISOLATION VALVE (PIV) LEAKAGE</b>				
L.1	Allows operation to continue with one or both pressure isolation valves for the RCS/RHR interface exceed required leakage limits if both of the following Actions are met: the leakage path must be isolated within 4 hours using a valve in the RCS pressure boundary or the high pressure portion of the system which meets the leakage limits; and, the both valves in the flow path are restored to meet leakage limits within 72 hours.	3.1.F.2.b.(1) 3.1.F.2.b.(2)	3.4.14 RA-A.1 3.4.14 RA-A.2	III
L.2	Extends the time allowed to place the plant in cold shutdown (i.e., Mode 5) from 24 hours to 36 hours when limits for RCS/RHR leakage are not met.	3.1.F.2.b.(1) 3.1.F.2.b.(2)	3.4.14 RA-A.1 3.4.14 RA-A.2 3.4.14 RA-B.1 3.4.14 RA-B.2	III
L.3	Deletes requirement that RCS/RHR PIV leakage be tested whenever the RCS pressure decreases to 700 psig (i.e. within 100 psig of the RHR design pressure) or whenever the RHR is secured to go to hot shutdown and replaces it with a new requirement that testing for gross leakage must be performed within 24 hours following any valve actuation due to automatic or manual action or after any flow through the valve.	4.16.B	3.4.14.1 SR	V
L.4	Allows entering Modes 3 and 4 without completing required RCS/RHR pressure isolation valve leakage so that the necessary differential pressures and stable conditions needed for performance of this Surveillance can be established.	4.16.A.5	3.4.14.1 SR	V
L.5	Extends the length of a shutdown that requires performance of leakage testing be performed for the RCS/RHR pressure isolation valves from 72 hours to 7 days.	4.16.A.5	3.4.14.1 SR	III
<b>ITS SPECIFICATION 3.4.15 - RCS LEAKAGE DETECTION INSTRUMENTATION</b>				
L.1	Superceded by TSFT-359, Revision 9, "Increased Flexibility in MODE Restraints."	NA	NA	
L.2	Extends the time allowed to reach Mode 3 when all required RCS leakage detection systems are inoperable from 6 hours to 7 hours and the time allowed to reach Mode 5 from 36 hours to 37 hours	3.1.F.1.c	3.4.15 RA-F.1 3.0.3 LCO	III

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Section 3.4

Categories for L-Table

I - Relaxation of Modes of Applicability  
II - Relaxation of Surveillance Requirement  
III - Relaxation of Completion Time

IV - Relaxation of Required Actions  
V - Relaxation of LCO  
VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
L.3	Relaxes requirements for the number and diversity of RCS leakage detection instruments, the allowable out of service times for these instruments, and the compensatory actions required if one or more RCS leakage detection instruments are not Operable. These changes make IP2 consistent with the recommendations in Reg. Guide 1.4.5, Reactor Coolant Pressure Boundary Leakage Detection Systems, as presented in NUREG-1431, Rev. 2.	3.1.F.1.a 3.1.F.1.b.2	3.4.15 LCO 3.4.15 RA-A.1 3.4.15 RA-A.2	V
L.4	Eliminates the option of using two containment atmosphere radiation monitors (gaseous and particulate) if the containment fan cooler condensate flow monitor is not Operable.	3.1.F.1.a.(6)(a) 3.1.F.1.a.(6)(b) 3.1.F.1.b.(3)	3.4.15 LCO 3.4.15 RA-A.1 3.4.15 RA-A.2	
L.5	Allows the compensatory action for inoperable containment sump monitor (i.e., RCS water inventory balance every 24 hours) until 12 hours after establishment of steady state operations because steady state operation is required to perform a proper inventory balance.	3.1.F.1.b.(3)	3.4.15 RA-A.1	IV
L.6	Allows both containment atmosphere radiation monitors and the containment fan cooler condensate flow monitor to be inoperable for up to 30 days. CTS required at least one containment atmosphere radiation monitor or the containment fan cooler condensate flow monitor to be Operable at all times.	3.1.F.1.b.(6)	3.4.15 RA-D.1 3.4.15 RA-D.2	V
L.7	Allows use of an RCS water inventory balance as the compensatory action for inoperable required containment atmosphere radioactivity monitoring system.	3.1.F.1.b.(6)	3.4.15 RA-B.1 3.4.15 RA-B.2	
<b>ITS SPECIFICATION 3.4.16 - RCS SPECIFIC ACTIVITY</b>				
L.1	Excludes I-135 when calculating of E-Bar and when measuring gross specific activity. This change is made in conjunction with a change that adds a new limit for transient and steady state Dose Equivalent I-131 and requirement for periodic verification that Dose Equivalent I-131 is within these limits which ensure that the radiological consequences after an SGTR are within 10 CFR 50.67 limits.	1.0 T 4.1-2, Foot Note No.2	1.0 3.4.16.1 SR	

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
L.2	Extends the allowance for the first determination of E-bar from as soon as the "gross activity analysis" exceeds 10 micro curies per cc to 31 days after a minimum of 2 effective full power days and 20 days of MODE 1 operation have elapsed since the reactor was last subcritical for at least 48 hours.	T 4.1-2, Foot Note No.3	3.4.16.3 SR	II
L.3	Increases maximum interval between determinations of E Bar from 30 weeks to 32.5 weeks consistent with the allowance provided in ITS SR 3.0.2.	T 4.1-2, No.1	3.4.16.3 SR 3.0.2 SR	II
L.4	Eliminates requirement for accelerated re-calculation of E-bar based on the results of the gross specific activity verification.	T 4.1-2, Foot Note No.3	3.4.16.3 SR	II

**TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS**

**ITS SECTION 3.5 – EMERGENCY CORE COOLING SYSTEMS (ECCS)**

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
<b>ITS SPECIFICATION 3.5.1 - ACCUMULATORS</b>				
L.1	Eliminates restriction on concurrent inoperability of an Accumulator when any RWST, any HHSI Pump, any RHR Pump, or any Recirculation Pump even if the minimum complement of ECCS systems assumed available in the safety analysis remains Operable.	3.3.A.2	3.5.1 LCO 3.5.2 LCO 3.5.4 LCO	V
L.2	CTS requires immediate reactor shutdown if one accumulator is inoperable because boron concentration is not within limits. ITS allows 72 hours to restore boron concentration before reactor shutdown must be initiated if only one accumulator has a boron concentration not within required limits.	3.3.A.2	3.5.1 RA-A.1	III
L.3	CTS requirement to place reactor in cold shutdown (within 48+ hours) if inoperable accumulator not restored to Operable within specified time replaced with ITS requirement to place reactor outside Applicability within 12 hours. Ambiguity between CTS Applicability and CTS Actions is resolved by ensuring that the Actions are consistent with the ITS Applicability.	3.3.A.2	3.5.1 RA-C.2	I
L.4	Increases Completion Time for restoration of an inoperable ECCS accumulator from immediately to 24 hours based on WCAP-14049, "Risk Informed Evaluation of an Extension to Accumulator Completion Times," and the justification provided in TSTF-370, Rev. 1.	3.3.A.2 3.0.1	3.5.1 RA-B.1	III
L.5	ITS maintains the requirement that each accumulator isolation valve is fully open with motor operators de-energized; however, the implementing detail that "circuit breakers at the MCC must be locked out" is deleted. ITS SR 3.5.1.1 and ITS SR 3.5.1.5 use administrative controls and new requirements for periodic verification that the valves are open and de-energized to ensure that the valves are open when required.	3.3.A.1.i	3.5.1.1 SR 3.5.1.5 SR	II

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
<b>ITS SPECIFICATION 3.5.2 - ECCS - OPERATING</b>				
L.1	Deleted the explicit requirements for a high head safety injection flow test and/or verification of the position of mechanical stops on ECCS injection lines following any maintenance or modifications to those components. ITS SR 3.0.1 addresses these issues generically, eliminating need for the requirement for individual systems or components.	4.5.A.1.c 4.5.A.1.d	3.0.1 SR	II
L.2	Decreases the Frequency for verification that the position stop for each ECCS throttle valve is in the correct position from "at a convenient outage, if not verified in the preceding three months" to every 24 months.	4.5.A.1.d	3.5.2.6 SR	II
L.3	Added a relaxation that the high head safety injection flow path may be isolated for 2 hours in Mode 3, under controlled conditions, to perform pressure isolation valve testing per SR 3.4.14.1.	4.5.A.1.d 3.3.A.2	3.5.2 LCO Note 3.4.14.1 SR	V
L.4	Eliminates restriction on concurrent inoperability of an Accumulator, the RWST, any HHSI Pump, any RHR Pump, or any Recirculation Pump even if the minimum complement of ECCS systems assumed available in the safety analysis remains Operable.	3.3.A.2	3.5.2 RA-A.1 3.5.2 RA-C.1	V
L.5	Extends the Allowable out of service time for ECCS (HHSI, RHR and Recirculation) to 72 hours if equipment supporting flow equivalent to two HHSI pumps, one RHR pump and one recirculation pump remain Operable.	3.3.A.2.a 3.3.A.2.b 3.3.A.2.c 3.3.A.2.d	3.5.2 RA-A.1	III
L.6	Deletes statements that ECCS pump system testing "will be considered satisfactory if control board indication and visual observations indicate that all components have received the safety injection signal in the proper sequence and timing; that is, the appropriate pump breakers shall have opened and closed, and the appropriate valves shall have completed their travel" because requirements for Operability are covered by the ITS definition of Operability and general statements about what constitutes a satisfactory performance of an SR is generally not included in the acceptance criteria for either the CTS or ITS.	4.5.A.1.b	3.5.2.4 SR 3.5.2.5 SR	II

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## Section 3.5

### Categories for L-Table

I - Relaxation of Modes of Applicability  
II - Relaxation of Surveillance Requirement  
III - Relaxation of Completion Time

IV - Relaxation of Required Actions  
V - Relaxation of LCO  
VI - Relaxation of Reporting Requirement



Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
L.7	Deleted the phrase "With the Reactor Coolant System pressure less than or equal to 350 psig and temperature less than or equal to 350°F..." in CTS 4.5.A.1.a will be deleted because, at IP2, testing of the Safety Injection System (i.e., High Head Safety Injection Pumps and the RHR pumps) is performed in Mode 5 consistent with the clarification in the ITS Bases that testing must be performed "under conditions that apply during a plant outage."	4.5.A.1.a	3.5.2.4 SR 3.5.2.5 SR	II
<b>ITS SPECIFICATION 3.5.3 - ECCS – SHUTDOWN</b>				
	NONE			
<b>ITS SPECIFICATION 3.5.4 - REFUELING WATER STORAGE TANK (RWST)</b>				
L.1	Eliminates restriction on concurrent inoperability of the RWST, Accumulators, HHSI Pumps, RHR Pumps, or Recirculation Pumps if the minimum complement of ECCS systems assumed available in the safety analysis remains Operable.	3.3.A.2	3.5.4 LCO 3.5.1 LCO 3.5.2 LCO	V
L.2	Provides an 8 hour allowance to restore RWST boron concentration to within required limits before plant shutdown and cooldown must be initiated.	3.3.A.2	3.5.4 RA-A.1	III
L.3	CTS requires immediate reactor shutdown if RWST is inoperable because no allowable out of service time is specified. ITS allows 1 hour to restore inoperable RWST before reactor shutdown must be initiated.	3.3.A.2	3.5.4 RA-C.1	III

**TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS**

**ITS SECTION 3.6 – CONTAINMENT SYSTEMS**

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
<b>ITS SPECIFICATION 3.6.1 - CONTAINMENT</b>				
	NONE			
<b>ITS SPECIFICATION 3.6.2 - CONTAINMENT AIR LOCKS</b>				
L.1	Allows ingress or egress through an air lock with an inoperable door whenever necessary to perform repairs on the affected air lock components. Allows ingress or egress through an air lock with an inoperable door for any reason for a period of 7 days beginning when the second air lock (i.e., both) becomes inoperable.	1.7 3.6.A.3	3.6.2 ACTIONS Note 1 3.6.2 RA-A.1 Note 2	V
L.2	Allows 24 hour to restore an inoperable airlock provided containment leakage limits are met during that period and at least one air lock door is closed during that period.	3.6.A.3	3.6.2 RA-C.3	III
L.3	Allows completely separate re-entry into any Condition for each air lock addressed by the Condition including separate tracking of Completion Times based on this re-entry.	1.7.c 3.6.A.3	3.6.2 ACTIONS- Note 2	III
<b>ITS SPECIFICATION 3.6.3 - CONTAINMENT ISOLATION VALVES</b>				
L.1	Allows use of a check valve with flow through the valve secured to isolate a penetration when only one of two (or more) containment isolation valves in a penetration is inoperable.	1.7.d 3.6.A.1.b 3.6.A.1.c	3.6.3 RA-A.1	IV
L.2	Extends the Completion Time to isolate a penetration with an inoperable automatic containment isolation valve from 4 hours to 72 hours for penetration flow paths with only one containment isolation valve but protecting a closed system.	3.6.A.3.a.2(b) 3.6.A.3.a.2(c)	3.6.3 RA-C.1	III

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
L.3	Expands allowance in CTS 3.6.A.1.a permitting manual containment isolation valves to be opened to include manual valves used to substitute for inoperable automatic isolation valves and automatic valves that are closed as part of a Required Action (excluding the 36 inch purge valves) and eliminates the limitation that valves may be open only as long as necessary to perform the intended function.	3.6.A.1.a T 3.6-1	3.6.3 ACTION- Note 1	V
L.4	Not Used.	NA	NA	
L.5	Expands conditions that allow opening the containment purge supply and exhaust isolation valves and the pressure relief line isolation valves from "containment pressure control, or to facilitate safety-related surveillance or safety-related maintenance" to "pressure control, ALARA or air quality considerations for personnel entry, or for Surveillances that require the valves to be open."	3.6.A.2 3.6.A.2 Note 1	SR 3.6.3.1 SR 3.6.3.2	II V
L.6	Superceded by Amendment 223.	NA	NA	
L.7	Exempts valves that are locked, sealed or otherwise secured in position from the requirement to verify that containment isolation valves actuate to the isolation position on an actual or simulated containment isolation signal.	T 4.1-3, Item 5	SR 3.6.3.6	II
L.8	Deletes requirement that isolation devices used to isolate containment penetrations must "meet the same design criteria as the isolation valve" to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases for LCO 3.6.3).	1.7.d 3.6.A.1.b 3.6.A.3.a.2(c)		IV
L.9	Extends the Completion Time for restoration of leakage limits for the leakage rate into containment from the isolation valves sealed with the service water system from 4 hours to 72 hours because of the availability of alternate methods for performing the containment recirculation function and the low probability of an event occurring during the 72 hour period when leakage limits are not met.	3.6.A.1.f 3.6.A.3 4.4.D.2.b	3.6.3 RA-D.1	III
<b>ITS SPECIFICATION 3.6.4 - CONTAINMENT PRESSURE</b>				
L.1	Allows one hour for restoration of containment pressure to within required limits before a reactor shutdown must be initiated.	3.0 3.6.B	3.6.4 RA-A.1	III

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## Section 3.6

### Categories for L-Table

I - Relaxation of Modes of Applicability  
II - Relaxation of Surveillance Requirement  
III - Relaxation of Completion Time

IV - Relaxation of Required Actions  
V - Relaxation of LCO  
VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
<b>ITS SPECIFICATION 3.6.5 - CONTAINMENT AIR TEMPERATURE</b>				
L.1	Allows 8 hours for restoration of containment average air temperature to within required limits before a reactor shutdown must be initiated.	3.6.C	3.6.5 RA-A.1	III
<b>ITS SPECIFICATION 3.6.6 - CONTAINMENT SPRAY SYSTEM AND CONTAINMENT FAN COOLER UNIT (FCU) SYSTEM</b>				
L.1	Allows the containment spray system or the fan cooler units to be inoperable regardless of the Operability status of the recirculation pH control system.	3.3.B.2	LCO 3.6.6 3.6.7 RA-A.1	V
L.2	Not Used	NA	NA	
L.3	Allows any one FCU train (i.e., up to 2 FCUs) to be inoperable for 7 days and any two FCU trains (i.e., up to 4 FCUs) to be inoperable for 72 hours if the combination of Operable FCUs and containment spray pumps provide sufficient heat removal capability to maintain the post-accident containment pressure below the design value.	3.3.B.2	3.6.6 RA-C.1 3.6.6 RA-D.1 3.6.6 RA-F.1	IV
L.4	Extends the Frequency for verification that containment spray nozzles are not obstructed from 5 years to 10 years.	4.5.B.2	SR 3.6.6.8	II
L.5	Eliminates statement that containment spray system "tests will be considered satisfactory if visual observations indicate all components have operated satisfactorily" because ITS requires demonstrating Operability and this type of generic statement is not used in either the CTS or ITS.	4.5.B.1 4.5.B.3	NA	II
L.6	Clarifies that functional tests of the containment spray system and fan cooler units may be initiated by either an actual or simulated signal.	4.5.B.1	SR 3.6.6.5 SR 3.6.6.6	II
L.7	Allows one of the two containment spray pumps to be inoperable for up to 72 hours even when 1 train of fan cooler units (i.e., up to two FCUs powered from the same safeguards power train) is also inoperable if the combination of Operable FCUs and containment spray pumps provide sufficient heat removal capability to maintain the post-accident containment pressure below the design value.	3.3.B.2.b	3.6.6 RA-A.1 3.6.6 RA-F.1	IV

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## Section 3.6

### Categories for L-Table

I - Relaxation of Modes of Applicability  
II - Relaxation of Surveillance Requirement  
III - Relaxation of Completion Time

IV - Relaxation of Required Actions  
V - Relaxation of LCO  
VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
<b>ITS SPECIFICATION 3.6.7 - RECIRCULATION pH CONTROL SYSTEM</b>				
L.1	Allows the recirculation pH control system to be inoperable regardless of the Operability status of either the containment spray system or the fan cooler units.	3.3.B.2	3.6.7 RA-A.1	V
L.2	Not Used	NA	NA	
<b>ITS SPECIFICATION 3.6.8 - HYDROGEN RECOMBINERS</b>				
L.1	Allows a hydrogen recombiner to be inoperable (for up to 30 days) if the redundant hydrogen recombiner is Operable but eliminates the requirement that the post accident containment venting system is Operable.	3.3.G.2 3.3.G.2.a	3.6.8 RA-A.1	V
L.2	Allows both hydrogen recombiners to be inoperable for up to 7 days if the post accident containment venting system is functional (i.e., capable of limiting the peak post accident hydrogen concentration in containment to less than 4.0 volume percent).	3.3.G.2 3.3.G.2.a	3.6.8 RA-B.1 3.6.8 RA-B.2	III
L.3	Allows entry into Modes 1 and 2 if one of the two hydrogen recombiners is inoperable based on ITS LCO 3.0.4 and SR 3.0.4, including TSTF-359, Revision 9, "Increased Flexibility in MODE Restraints," which establishes restrictions on placing the unit in a mode or other specified condition stated in the applicability when conditions are such that the requirements of the LCO would not be met if the LCO were entered.	3.3.G.1	LCO 3.0.4 SR 3.0.4 LCO 3.6.8	I, V
<b>ITS SPECIFICATION 3.6.9 - ISOLATION VALVE SEAL WATER (IVSW) SYSTEM</b>				
L.1	Establishes a 24 hour allowable out of service time for IVSW inoperability for reasons other than inoperable header or inoperable automatic actuation valve (e.g., water level low, nitrogen pressure low, etc).	3.3.C.2 3.0	3.6.9 RA-B.1	III

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
<b>ITS SPECIFICATION 3.6.10 - WELD CHANNEL AND PENETRATION PRESSURIZATION SYSTEM (WCPPS)</b>				
L.1	Allows components supported by WC&PPS on more than one header to be inoperable at the same time and allows separate condition entry for each component supported by WC&PPS.	3.3.D.2.a 3.3.D.3	3.6.10 ACTIONS- Note 1 3.6.10 RA-A.1 3.6.10 RA-A.2	IV V

**TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS**

**ITS SECTION 3.7 – PLANT SYSTEMS**

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
<b>ITS SPECIFICATION 3.7.1 - MAIN STEAM SAFETY VALVES (MSSVs)</b>				
L.1	Eliminates requirement for a reduction of the Power Range Neutron Flux Trip Setpoint if only one MSSV in one or more SGs is inoperable.	3.4.A.1	3.7.1 RA-A.1	IV
L.2	Decreases frequency for testing MSSVs from every 24 months to in accordance with the ASME Code, Section XI, as stipulated in ANSI/ASME OM-1-1987. Adopting these standards will relax the CTS 24 month Frequency because the ANSI/ASME Standard requires that all valves be tested every 5 years, and a minimum of 20% of the valves be tested every 24 months.	T 4.1-3, No.4	3.7.1.1 SR	II
<b>ITS SPECIFICATION 3.7.2 - MAIN STEAM ISOLATION VALVES (MSIVs) AND MAIN STEAM CHECK VALVES (MSCVs)</b>				
L.1	Establishes an allowable out of service time for one or more inoperable MSCV which eliminates the current requirement for an immediate shutdown if an MSCV is inoperable.	3.4.A.5	3.7.2 LCO 3.7.2 RA-A.1 3.7.2 RA-B.1 3.7.2 RA-B.2 3.7.2 RA-F.1 3.7.2 RA-F.2	III
L.2	Relaxes Applicability to require MSIVs to be Operable only if MSIV is open.	3.4.A	3.7.2 APP 3.7.2 RA-D.1 3.7.2 RA-E.1 3.0.4 LCO	I
<b>ITS SPECIFICATION 3.7.3 - MAIN FEEDWATER ISOLATION</b>				
	NONE			

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
<b>ITS SPECIFICATION 3.7.4 - ATMOSPHERIC DUMP VALVES (ADVs)</b>				
	NONE			
<b>ITS SPECIFICATION 3.7.5 - AUXILIARY FEEDWATER (AFW) SYSTEM</b>				
L.1	Allows 7 days to restore the redundant steam supply to steam driven AFW pump before initiation of plant shutdown is required (versus 72 hours if the AFW pump is considered inoperable).	3.4.B	3.7.5 RA-A.1	III
L.2	Adds an allowance that the SRs are not required to be performed for the turbine driven AFW pump until 24 hours after pressure in the steam generators is greater than or equal to 600 psig.	4.8.A.1 4.8.A.2	3.7.5.4 SR 3.7.5.2 SR	II
L.3	Deletes requirement for periodic verification of AFW flow to each SG because IP2 uses AFW during normal startup and shutdown which independently verifies the adequacy of the flow path to each SG which is common for each of the AFW pumps.	4.8.A.2	3.7.5.2 SR	II
L.4	Allows 7 days to restore the steam driven AFW pump to Operable if the inoperability is discovered before the plant has entered Mode 2 following a refueling outage and the plant does not enter Mode 2 until the pump is Operable.	3.4.B.1.a	3.7.5 RA-A.1	III
L.5	Deletes requirement to immediately place auxiliary feedwater start in the manual mode when one or both of the valves on the common AFW suction are closed (i.e., ITS LCO 3.7.5, Condition D, loss of 3 AFW pumps). Requirement is for equipment protection and is maintained in IP2 UFSAR 10.2.6.3.	3.4.C.1 3.4.C.2	3.7.5	IV
<b>ITS SPECIFICATION 3.7.6 - CONDENSATE STORAGE TANK</b>				
L.1	Increases the allowable out of service time for an inoperable CST from 72 hours to 7 days.	3.4.A.3 3.4.B	3.7.6 RA-A.2	III



Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
<b>ITS SPECIFICATION 3.7.7 - COMPONENT COOLING WATER (CCW) SYSTEM</b>				
L.1	Reduces the required number of Operable CCW pumps from three to two because both CCW trains use common piping on the suction and discharge of the pumps and any one of the three CCW pumps in conjunction with any one of the two CCW heat exchangers is sufficient to accommodate the normal and post accident heat load.	3.3.E.1.a 3.3.E.1.c 3.3.E.2	3.7.7 LCO 3.7.7 RA-A.1	V
L.2	Extends the allowable out of service time to restore 100% redundancy to the CCW function from 24 hours to 72 hours.	3.3.E.1.a	3.7.7 RA-A.1	III
L.3	Deletes requirements for the auxiliary component cooling pumps because UFSAR 6.2.3.3.2.4 states that these pumps are not necessary to protect the recirculation pump motors from the containment atmosphere during the injection phase.	3.3.E.1.b 3.3.E.2.c	3.7.7	V
L.4	Deletes restriction that "Component Cooling Pump 22 may be out of service if Emergency Diesel Generator 22 is out of service or if no emergency diesel generator is out of service."	3.3.E.2.a	3.7.7 3.8.1	V
<b>ITS SPECIFICATION 3.7.8 - SERVICE WATER (SW) SYSTEM</b>				
L.1	Extends the Allowable Out of Service Time when one of three required essential SW pumps is inoperable and/or one of two required non-essential SW pumps is inoperable from 12 and 24 hours, respectively, to 72 hours.	3.3.F.1.a 3.3.F.2.a	3.7.8 RA-A.1 3.7.8 RA-B.1	III
<b>ITS SPECIFICATION 3.7.9 - ULTIMATE HEAT SINK (UHS)</b>				
L.1	Not Used.	NA	NA	
<b>ITS SPECIFICATION 3.7.10 - CONTROL ROOM VENTILATION SYSTEM (CRVS)</b>				
L.1	Not Used.	NA	NA	

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
L.2	Allows alternating between Control Room Ventilation System fans for each test performance of the test that verifies that the system maintains the control room at positive pressure relative to the adjacent areas during the pressurization mode of operation. CTS did not establish any requirements for redundancy for the CRVS; therefore, a satisfactory performance of the test by either fan would have established Operability of the CRVS.	3.5.E.4	3.7.10.4 SR	II
<b>ITS SPECIFICATION 3.7.11 – SPENT FUEL PIT WATER LEVEL</b>				
L.1	Relaxes Applicability for when a specified minimum level is required in the spent fuel pit from "any time it contains irradiated fuel" to "during movement of irradiated fuel assemblies in the spent fuel pit."	3.8.C 3.8.C.2	3.7.11 LCO	V
L.2	Reduces the minimum required water level in the spent fuel pit from approximately 24 feet to greater than or equal to 23 feet above the top of irradiated fuel assemblies seated in the storage racks which is consistent with the assumptions used in the design basis analysis of a fuel handling accidents in the Fuel-Handling Building.	3.8.C.2	3.7.11 LCO	V
<b>ITS SPECIFICATION 3.7.12 - SPENT FUEL PIT BORON CONCENTRATION</b>				
L.1	Superceded by Amendment 227 dated May 29, 2002.	NA	NA	
L.2	Eliminates the requirement that spent fuel pit boron concentration meets the higher minimum level required in the refueling cavity whenever fuel is being loaded or unloaded from the reactor.	3.8.D.3 3.8.D.4	3.7.12 LCO	V
<b>ITS SPECIFICATION 3.7.13 - SPENT FUEL PIT STORAGE</b>				
L.1	Corrects typographical error in CTS 3.8.D.1.d introduced in Amendment 227 that prevents use of the six designated "peripheral" cells for their intended purpose of storing fuel assemblies that are permanently discharged after only one cycle (i.e., low burnup fuel assemblies).	3.8.D.1.d	3.7.13 LCO  F 3.7.13-4	V

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
L.2	Eliminates requirement for immediate verification that spent fuel pit boron concentration is within required limits if a fuel assembly is determined to be stored in a location not permitted by the LCO because this requirement is redundant to requirements in ITS LCO 3.7.14, Spent Fuel Pit Boron Concentration.	3.8.D.2.a	3.7.13 LCO	IV
<b>ITS SPECIFICATION 3.7.14 - SECONDARY SPECIFIC ACTIVITY</b>				
L.1	Decreases the Frequency for verification that secondary coolant Iodine-131 concentration is within limits assumed in the offsite dose calculations from weekly with a maximum time between tests of 10 days to once per 31 days with a maximum time between tests governed by ITS SR 3.0.2.	T 4.1-2, No.9	3.7.14.1 SR 3.0.2 SR	II
L.2	Eliminates requirement for more frequent (i.e., daily) verification when secondary coolant iodine-131 activity exceeds 10% of the limit.	T 4.1-2, No. 9 T 4.1-2, Note 4	3.7.14	II

**TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS**

**ITS SECTION 3.8 – ELECTRICAL POWER SYSTEMS**

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
<b>ITS SPECIFICATION 3.8.1 - AC SOURCES - OPERATING</b>				
L.1	Limits the requirement to disable automatic transfer of 6.9 kV buses 1, 2, 3, and 4 to the offsite source if the 13.8 kV offsite source is supplying 6.9 kV bus 5 or 6 to those times that the Unit Auxiliary Transformer is supplying 6.9 kV bus 1, 2, 3 or 4.	3.7.B.4	3.8.1 RA-A.2	
L.2	Extends the allowable out of service time (AOT) for an inoperable offsite source from 24 hours to 72 hours consistent with the recommendations of Regulatory Guide 1.93, Availability of Electric Power Sources, Revision 0.	3.7.B.3	3.8.1 RA-A.4	III
L.3	Allows 4 hours to declare inoperable any required feature supported by an inoperable diesel generator if the required redundant feature is inoperable.	3.7.B.1.a	3.8.1 RA-B.2	III
L.4	Eliminates the requirement that the Operable DGs must be tested within 24 hours whenever a DG is declared inoperable if it can be determined that the cause of the DG's inoperability does not exist on the Operable DGs.	3.7.B.1	3.8.1 RA-B.3.1 3.8.1 RA-B.3.2	IV
L.5	Eliminates requirement for immediate shutdown if more than one DG or more than one offsite source is inoperable or if a DG and offsite source are inoperable concurrently. Allows 24 hours to restore at least one offsite source if both are inoperable; allows 12 hours to restore an offsite source or a DG if one offsite source and one DG are inoperable; and, allows 2 hours to restore at least 2 DGs to Operable if 2 or more DGs are inoperable.	3.7.B	3.8.1 RA-C.2 3.8.1 RA-D.1 3.8.1 RA-D.2 3.8.1 RA-E.1	III
L.6	Relaxes CTS 4.6.A.3 requirement that the DG loss of offsite power in conjunction with loss of coolant accident test be conducted on all three DGs at the same time.	4.6.A.3	3.8.1.12 SR 3.8.1.13 SR	II
L.7	Replaces requirement that control switches are 'in the "pull-out" position and tagged to prevent an automatic transfer' with a requirement to verify automatic transfer is disabled within 1 hour and every 8 hours thereafter.	3.7.B.3 3.7.B.4	3.8.1 RA-A.2	IV

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**Section 3.8**

Categories for L-Table

I - Relaxation of Modes of Applicability  
II - Relaxation of Surveillance Requirement  
III - Relaxation of Completion Time

IV - Relaxation of Required Actions  
V - Relaxation of LCO  
VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
<b>ITS SPECIFICATION 3.8.2 - AC SOURCES - SHUTDOWN</b>				
	NONE			
<b>ITS SPECIFICATION 3.8.3 - DIESEL FUEL OIL AND STARTING AIR</b>				
L.1	Eliminates requirements for maintaining an offsite DG fuel oil reserve except when in Modes 1, 2, 3 and 4.	3.7.A.5 4.6.B	3.8.3 RA-C.1 3.8.3.1 SR	I
L.2	Decreases the Frequency for verification of the DG fuel oil inventory in the DG fuel oil storage tanks from weekly to every 31 days.	T 4.1-3, No.7	3.8.3.1 SR	II
L.3	Provides time to attempt restoration if properties of diesel fuel oil in the DG storage tanks or DG fuel oil reserve do not meet acceptance criteria specified in Specification 5.5.11, "Diesel Fuel Oil Testing Program."	3.7 4.6	3.8.3 RA-D.1 3.8.3 RA-E.1 3.8.3.3 SR 3.8.3.4 SR	III
L.4	Allows 48 hours to restore starting air receiver pressure if the pressure is not sufficient for four successive DG start attempts but sufficient for at least one start attempt	3.7 4.6	3.8.3 RA-F.1	IV
L.5	Allows 2 hours to attempt restoration before a DG is declared inoperable if the volume in the associated DG fuel oil storage tank or the offsite reserve falls below the specified minimum volume.	3.7.B.1.b	3.8.3 RA-A.1 3.8.3 RA-C.1	III
<b>ITS SPECIFICATION 3.8.4 - DC SOURCES – OPERATING</b>				
L.1	Allows a battery or a battery and its associated charger to be inoperable at the same time for up to 24 hours if both the DC control power and the inverter supporting the vital instrument bus are already supplied by or will automatically transfer to an alternate source.	3.7.B.5 3.7.B.6	3.8.4 RA-B.3	V

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
L.2	Allows one battery charger to be inoperable for up to 7 days if battery terminal voltage is restored to greater than or equal to the minimum established float voltage within 2 hours and battery float current is verified to be within the limits of for a fully charged battery once per 12 hours. Alternately, allows the Actions for an inoperable battery and charger to be taken if battery terminal voltage cannot be restored to greater than or equal to the minimum established float voltage within 2 hours or battery float current cannot be restored to within the limits of for a fully charged battery within 12 hours.	3.7.B.5 3.7.B.6	3.8.4 RA-A.1 3.8.4 RA-A.2	IV
<b>ITS SPECIFICATION 3.8.5 - DC SOURCES - SHUTDOWN</b>				
	NONE			
<b>ITS SPECIFICATION 3.8.6 - BATTERY PARAMETERS</b>				
L.1	Relaxes a requirements to measure voltage of each battery cell every month to a requirement for cell voltage verification every 31 days for pilot cell and 92 days for each connected cell consistent with IEEE-450-1995.	4.6.C.1	3.8.6.2 SR 3.8.6.5 SR	II
L.2	Adds Actions and Completion Times which allow a short period of time to restore battery parameters (i.e., cell voltage, battery charge state, battery level, battery temperature) to within surveillance limits before the battery must be declared inoperable.	3.7.A.6	3.8.6	III
<b>ITS SPECIFICATION 3.8.7 - INVERTERS - OPERATING</b>				
	NONE			
<b>ITS SPECIFICATION 3.8.8 - INVERTERS - SHUTDOWN</b>				
	NONE			

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
<b>ITS SPECIFICATION 3.8.9 - DISTRIBUTION SYSTEMS - OPERATING</b>				
L.1	Establishes an allowable out of service time of 8 hours for one AC electrical power distribution subsystem, 2 hours for one AC vital instrument bus, and 2 hours for one DC electrical power distribution subsystem.	3.7	3.8.9 RA-A.1 3.8.9 RA-B.1 3.8.9 RA-C.1	III
<b>ITS SPECIFICATION 3.8.10 - DISTRIBUTION SYSTEMS - SHUTDOWN</b>				
	NONE			

**TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS**

**ITS SECTION 3.9 - REFUELING OPERATIONS**

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
<b>ITS SPECIFICATION 3.9.1 - BORON CONCENTRATION</b>				
L.1	Eliminates requirements for containment integrity that apply during power operation be established if requirements for boron concentration in the RCS are not met when the reactor vessel head is less than fully tensioned (i.e., Mode 6).	3.6.A.1 3.8.A.8	3.9.1 RA-A.1 3.9.1 RA-A.2 3.9.1 RA-A.3	V
L.2	Decreases Surveillance Frequency for the verification that boron concentration of all filled portions of the RCS and the refueling cavity are within specified limits while in Mode 6 from daily to every 72 hours.	3.8.B.2	3.9.1.1 SR	II
<b>ITS SPECIFICATION 3.9.2 - NUCLEAR INSTRUMENTATION</b>				
	NONE			
<b>ITS SPECIFICATION 3.9.3 – CONTAINMENT PENETRATIONS</b>				
L.1	<p>Eliminates Technical Specification requirements for containment closure during refueling operations except during movement of recently irradiated fuel within the containment" with the term "recently" defined in the ITS Bases as fuel assemblies that has been part of a critical reactor in the previous 100 hours. These relaxations were evaluated and accepted by the NRC based on an evaluation documented in the Safety Evaluation Report (SER) by the Office of Nuclear Reactor Regulation Related to Amendment No. 211 to Facility Operating License No. DPR-26, July 27, 2000.</p> <p>Note: Currently, CTS 3.8.B.4 specifies that "No movement of fuel in the reactor shall be made until the reactor has been subcritical for at least 100 hours." This requirement will be maintained in Technical Requirements Manual (TRM) 3.9.A. Therefore, TRM 3.9.a will prohibit movement of any fuel that can be classified as "recently irradiated" even though LCO 3.9.3 establishes requirements that are applicable only during the movement of recently irradiated fuel.</p>	3.8.A 3.8.B 3.8.B.4	3.9.3	I

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Section 3.9

Categories for L-Table

I - Relaxation of Modes of Applicability  
 II - Relaxation of Surveillance Requirement  
 III - Relaxation of Completion Time

IV - Relaxation of Required Actions  
 V - Relaxation of LCO  
 VI - Relaxation of Reporting Requirement



Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
L.2	<p>Allow the personnel access door in the containment closure plate to be open during movement of recently irradiated fuel as long as it was "capable of being closed" in the event of a refueling accident.</p> <p>Note: Currently, CTS 3.8.B.4 specifies that "No movement of fuel in the reactor shall be made until the reactor has been subcritical for at least 100 hours." This requirement will be maintained in Technical Requirements Manual (TRM) 3.9.A. Therefore, TRM 3.9.a will prohibit movement of any fuel that can be classified as "recently irradiated" even though LCO 3.9.3 establishes requirements that are applicable only during the movement of recently irradiated fuel.</p>	3.8.B.4 3.8.B.8	3.9.3.a	I, V
L.3	Eliminates requirement that containment closure is maintained by a valve that is "locked closed" and allows requirements for containment closure to be satisfied by "Closed by a manual or automatic isolation valve, blind flange, or equivalent" where equivalent is satisfied by any material that can provide a temporary, atmospheric pressure, ventilation barrier.	3.8.A.1 3.8.B.4 3.8.B.8	3.9.3.c	V
L.4	Allows penetration flow paths providing direct access from the containment atmosphere to the outside atmosphere to be unisolated under administrative controls during movement of recently irradiated fuel.	3.8.B.4	3.9.3	V
L.5	Eliminates requirements that Surveillance Tests for the containment purge supply, exhaust and pressure relief isolation valves be performed prior to a specific event (i.e., Prior to initial movement of the reactor vessel head) and requires that Surveillance Tests be performed only at a periodic Frequency of 24 months.	3.8.A.1	3.9.3.2 SR	II
<b>ITS SPECIFICATION 3.9.4 - RESIDUAL HEAT REMOVAL (RHR) AND COOLANT CIRCULATION - HIGH WATER LEVEL</b>				
L.1	Deletes requirement to suspend the unloading of fuel from the reactor or the loading of unirradiated fuel when requirements for redundant decay heat removal capability and forced flow in the reactor coolant system are not met. ITS LCO 3.9.4 will maintain the restriction on loading of irradiated fuel.	3.8.A.3 3.8.B.12	3.9.4 RA-A.2	V

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
<b>ITS SPECIFICATION 3.9.5 - RESIDUAL HEAT REMOVAL (RHR) AND COOLANT CIRCULATION - LOW WATER LEVEL</b>				
L.1	Eliminates the requirement to suspend all operations involving a reduction in boron concentration of the RCS when in Mode 6 when water level is less than 23 feet above the RPV flange and one RHR loop is in operation but no backup RHR loop is Operable.	3.8.A.3 3.8.A.5	3.9.5 RA-A.1	IV
L.2	Adds Note that that allows one RHR loop to be inoperable for a period of 2 hours provided the other loop is OPERABLE and in operation when in Mode 6 with water level less than 23 feet above the reactor vessel flange.	3.8	3.9.5	V
<b>ITS SPECIFICATION 3.9.6 - REFUELING CAVITY WATER LEVEL</b>				
	NONE			

**TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS**

**ITS SECTION 4.0 - DESIGN FEATURES**

<b>Discussion of Change</b>	<b>Summary of Change</b>	<b>CTS Section</b>	<b>ITS Section</b>	<b>Category</b>
	NONE			

**TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS**

**ITS SECTION 5.0 - ADMINISTRATIVE CONTROLS**

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
<b>ITS SPECIFICATION 5.1 - RESPONSIBILITY</b>				
	NONE			
<b>ITS SPECIFICATION 5.2 – ORGANIZATION</b>				
L.1	Provides an allowance for the unexpected absence of the required radiation protection technician that is similar to the allowance for unexpected absence of licensed operators provided in 10 CFR 50.54 (m)(2)(i), Note 1.	6.2.2.d	5.2.2.c	III
L.2	Replaces proscriptive requirements for staff working hours in Generic Letter 82-12 with requirement that “Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety related functions” and that “The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime.”	6.2.2.g	5.2.2.d	V
<b>ITS SPECIFICATION 5.3 – UNIT STAFF QUALIFICATIONS</b>				
	NONE			
<b>ITS SPECIFICATION 5.4 – PROCEDURES</b>				
L.1	Deletes requirements for Post Accident Sampling capability in CTS 6.8.4 and License Condition 2.M based on the analysis in WCAP-14986, Rev. 1, "Post Accident Sampling System Requirements: A Technical Basis," and the associated NRC Safety Evaluation dated June 14, 2000.	6.8.4 Lic 2.M	5.4	V

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
<b>ITS SPECIFICATION 5.5 – PROGRAMS AND MANUALS</b>				
<b>ITS SPECIFICATION 5.5.1 - OFFSITE DOSE CALCULATION MANUAL (ODCM)</b>				
	NONE			
<b>ITS SPECIFICATION 5.5.2 - PRIMARY COOLANT SOURCES OUTSIDE CONTAINMENT</b>				
	NONE			
<b>ITS SPECIFICATION 5.5.3 - RADIOACTIVE EFFLUENT CONTROLS PROGRAM</b>				
	NONE			
<b>ITS SPECIFICATION 5.5.4 - COMPONENT CYCLIC OR TRANSIENT LIMIT</b>				
	NONE			
<b>ITS SPECIFICATION 5.5.5 - REACTOR COOLANT PUMP FLYWHEEL INSPECTION PROGRAM</b>				
	NONE			
<b>ITS SPECIFICATION 5.5.6 - INSERVICE TESTING PROGRAM</b>				
L.1	Deleted requirement in CTS 4.2.4 and CTS Table 4.2-1 for special reactor vessel inspections of "indications" 236 inches below the RV flange at azimuth 345" based on NRC agreement that inspections are not required as documented in a letter from Donald S. Brinkman (NRC) to Stephen B. Bram (Consolidated Edison), "Reactor Vessel Fracture Mechanics Analysis (TAC No. 73794).	4.2.4 T 4.2-1	5.5.6	V
<b>ITS SPECIFICATION 5.5.7 - STEAM GENERATOR (SG) TUBE SURVEILLANCE PROGRAM</b>				
	NONE			

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
<b>ITS SPECIFICATION 5.5.8 - SECONDARY WATER CHEMISTRY PROGRAM</b>				
	NONE			
<b>ITS SPECIFICATION 5.5.9 - VENTILATION FILTER TESTING PROGRAM (VFTP)</b>				
L.1	Deletes the explicit requirement that testing of the sample of the charcoal adsorber be completed "within 31 days after removal" because ITS 5.5.9.c maintains the existing requirement that a sample of the charcoal adsorber is tested in accordance with ASTM D3803-1989 and Regulatory Position 6.a of Regulatory Guide 1.52, Revision 2, March 1978, does not identify any deviations from ASTM D3803-1989 about the time that may elapse between removal of the sample and testing.	4.5.E.2.d	5.5.9 5.5.9.c	III
<b>ITS SPECIFICATION 5.5.10 - EXPLOSIVE GAS AND STORAGE TANK RADIOACTIVITY MONITORING PROGRAM</b>				
	NONE			
<b>ITS SPECIFICATION 5.5.11 - DIESEL FUEL OIL TESTING PROGRAM</b>				
	NONE			
<b>ITS SPECIFICATION 5.5.12 - TECHNICAL SPECIFICATIONS (TS) BASES CONTROL PROGRAM</b>				
	NONE			
<b>ITS SPECIFICATION 5.5.13 - SAFETY FUNCTION DETERMINATION PROGRAM (SFDP)</b>				
	NONE			

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
<b>ITS SPECIFICATION 5.5.14 - CONTAINMENT LEAKAGE RATE TESTING PROGRAM</b>				
L.1	Adopts the allowance in ITS SR 3.0.3 that provides up to 24 hours to complete a missed surveillance requirement before a system or component is declared inoperable (i.e., LCO not met).	4.0.1 4.4.A 4.4.C 4.4.D	5.5.14.e 3.0.3 SR	III
<b>ITS SPECIFICATION 5.5.15 – BATTERY MONITORING AND MAINTENANCE PROGRAM</b>				
	NONE			
<b>ITS SPECIFICATION 5.6 - REPORTING REQUIREMENTS</b>				
	NONE			