

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 1.0 - USE AND APPLICATION

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
	NONE			

Indian Point - Unit 2

LA-1

Section 1.0

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 2.0 – SAFETY LIMITS (SLs)

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
LA.1	Relocates the Figure showing the limits on combinations of reactor power, reactor pressure and reactor temperature needed to ensure PCT and DNB are met to the Core Operating Limits Report (COLR).	2.1 F 2.1-1	2.1.1	Type 1
LA.2	Not Used.	NA	NA	

Indian Point - Unit 2

LA-2

Section 2.0

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.0 – LCO APPLICABILITY AND SR APPLICABILITY

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
	NONE			

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LA-3

Section 3.0

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.1 – REACTIVITY CONTROL SYSTEMS

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
ITS SECTION 3.1.1- SHUTDOWN MARGIN (SDM)				
LA.1	Relocates specific limits for shutdown margin from the Technical Specifications to the Core Operating Limits Report (COLR).	3.10.1 F 3.10-1	3.1.1	Type 1
ITS SECTION 3.1.2 - CORE REACTIVITY				
	NONE			
ITS SECTION 3.1.3 - MODERATOR TEMPERATURE COEFFICIENT (MTC)				
	NONE			
ITS SECTION 3.1.4 - ROD GROUP ALIGNMENT LIMITS				
LA.1	Relocates requirements periodic testing of the rod deviation monitor and the compensatory action when this rod deviation monitor is not working to a licensee document controlled by 10 CFR 50.59 (i.e., the TRM 3.1.A).	3.10.9 T 4.1-1, No.9	3.1.4	Type 3
LA.2	Relocates the explanation of reason for the allowance that rod alignment limits are "Not required to be met for individual control rods until 1 hour after completion of control rod movement" to a licensee controlled document (i.e., Bases for SR 3.1.4.1).	3.10.5.1	3.1.4.1 SR	Type 1
ITS SECTION 3.1.5 - SHUTDOWN BANK INSERTION LIMITS				
	NONE			

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Section 3.1

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
ITS SECTION 3.1.6 - CONTROL BANK INSERTION LIMITS				
	NONE			
ITS SECTION 3.1.7 - ROD POSITION INDICATION				
	NONE			
ITS SECTION 3.1.8 - PHYSICS TEST EXCEPTIONS - MODE 2				
LA.1	Relocates specific limits for shutdown margin from the Technical Specifications to the Core Operating Limits Report (COLR).	3.10.1.1 F 3.10-1	3.1.8 LCO 3.1.1 LCO	Type 1
LA.2	Relocates descriptive details that physics tests are performed "to measure control rod worth and shutdown margin. For this test the reactor may be critical with all but one control rod inserted" to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR, Section 13.6.1).	3.10.4.4	3.1.8.c LCO	Type 1

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Section 3.1

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.2 - POWER DISTRIBUTION LIMITS

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
ITS SECTION 3.2.1 - HEAT FLUX HOT CHANNEL FACTOR ($F_q(Z)$)				
LA.1	Relocates to the ITS Bases the information that power distribution maps are made using the moveable detector system and that measured values of $F_q(Z)$ must be adjusted to include tolerances for manufacturing and measurement errors before the measured value is compared to the limit in the COLR.	3.10.2.1 3.10.2.2	3.2.1.1 SR 3.2.1 LCO	Type 2
ITS SECTION 3.2.2 - NUCLEAR ENTHALPY RISE HOT CHANNEL FACTOR ($F_{\Delta H}^N$)				
LA.1	Relocates to the ITS Bases the information that power distribution maps are made using the moveable detector system and that measured values of $F_N \Delta H$ must be adjusted to include measurement errors before the measured value is compared to the limit in the COLR.	3.10.2.1 3.10.2.2	3.2.2.1 SR 3.2.2 LCO	Type 2
ITS SECTION 3.2.3 - AXIAL FLUX DIFFERENCE (AFD)				
LA.1	Relocates explanation that the target flux difference update required every 31 EFPDs is performed "by linear interpolation using the most recent measured value and a value of approximately 0 percent at the end of the cycle life" to the ITS Bases for SR 3.2.3.2.	3.10.2.3	3.2.3.2 SR	Type 2
LA.2	Relocates CTS descriptions and limits already specified in COLR to the COLR.	3.10.2 3.10.2.6.1	3.2.3 LCO	Type 1
LA.3	Relocates requirements for compensatory action if the instrumentation used to alarm non-conformance with the flux difference requirements and/or flux difference time requirements to a licensee document controlled by 10 CFR 50.59 (i.e., the TRM 3.3.F).	3.10.2.8	3.2.3 LCO	Type 2

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
ITS SPECIFICATION 3.2.4 - QUADRANT POWER TILT RATIO (QPTR)				
LA.1	Relocates requirements for the quadrant power tilt monitor to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.2.A).	3.10.3.4 3.10.10 T 3.5-2, No.14	3.2.4 LCO	Type 3

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Section 3.2

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
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- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.3- INSTRUMENTATION

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
ITS SPECIFICATION 3.3.1- REACTOR PROTECTION SYSTEM (RPS) INSTRUMENTATION				
LA.1	Relocates design information about the number of channels and the number of channels required to trip for each RPS and ESFAS Function to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases).	T 3.5-2 T 3.5-3 T 3.5-4	3.3.1 LCO 3.3.2 LCO 3.3.3 LCO 3.3.5 LCO 3.3.6 LCO	Type 1
LA.2	Relocates the instruction that the cover plate on the rear of the safeguards panel in the control room shall not be removed without authorization from the Watch Supervisor to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR 7.2.4.1.2).	3.5.5	3.3.1	Type 2
LA.3	Relocates remarks and clarification notes that explain the intent of RPS and ESFAS testing requirements to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases).	T 4.1-1	3.3.1	Type 1
LA.4	Relocates details associated with the setpoint of Overtemperature delta T Function to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR, Section 7.2.5.1.5).	2.3.1.B(4)	3.3.1	Type 1
LA.5	Relocates various cycle specific limits including design full power Tave and RCS pressure, limits and formulae for the adjustment of limits as a function of power for axial flux difference, trip functions constants associated with ITS 3.3.1, Function 5, Overtemperature delta T, and ITS 3.3.1, Function 6, Overpower delta T, from the Technical specifications to the Core Operating Limits Report (COLR).	2.3.1.B(4) 2.3.1.B(5)	T3.3.1-1 #5 T3.3.1-1 #6	Type 1
LA.6	Relocate the CTS nominal trip setpoints (i.e.; as-left limits) to plant procedures because IP2 ITS will use the "Allowable Value" instead of the normal trip setpoints as the limiting safety system setting (LSSS) that is required to be in the Technical Specifications by 10	2.3.1.A 2.3.1.B	T 3.3.1-1	Type 3

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Section 3.3

Categories for LA-Table

- 1 - Details of system design and system description including design limits
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- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
	CFR 50.36(c)(1).	2.3.1.1C		
ITS SPECIFICATION 3.3.2 - ENGINEERED SAFETY FEATURE ACTUATION SYSTEM (ESFAS) INSTRUMENTATION				
LA.1	Relocates information about the number of channels and the number of channels required to trip for each RPS and ESFAS Function to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases).	T 3.5-3 T 3.5-4	3.3.2	Type 1
LA.2	Relocates the instruction that the cover plate on the rear of the safeguards panel in the control room shall not be removed without authorization from the Watch Supervisor to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR 7.2.4.1.2)	3.5.5	3.3.2	Type 2
LA.3	Relocates remarks and clarification notes that are not directly related to the Operability of any RPS or ESFAS Function to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases)	T 4.1-1	3.3.2	Type 1
LA 4	Relocate the CTS nominal trip setpoints (i.e.; as-left limits) to plant procedures because IP2 ITS will use the "Allowable Value" instead of the normal trip setpoints as the limiting safety system setting (LSSS) that is required to be in the Technical Specifications by 10 CFR 50.36(c)(1).	T3.5-1	T3.3.2-2	Type 3
ITS SPECIFICATION 3.3.3 - POST ACCIDENT MONITORING (PAM) INSTRUMENTATION				
LA.1	Relocates alarm and/or indication instruments in CTS Table 3.5-5 (and associated surveillance requirements in CTS Table 4.1-1) for that are not RG 1.97, Type A or Category I to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.3.E and 3.3.G).	3.5.6 T 3.5-5	3.3.3	Type 2
LA.2	Relocates supporting information related to RG 1.97 Post Accident Monitoring Instruments to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases).	T 3.5-5, Note* T 3.5-5, Note**	3.3.3 5.5.13	Type 1

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Section 3.3

Categories for LA-Table

- 1 - Details of system design and system description including design limits
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- 4 - Administrative requirements redundant to regulations

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
LA.3	Relocates Allowable Out of Service Times for RG 1.97 Post Accident Monitoring instrument recorder capability to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.3.G) because the recorder function is not an integral requirement for a RG 1.97 Type A instrument.	T3.5-5, Action1	3.3.3 RA-C.1 5.5.13	Type 3
ITS SECTION 3.3.4 – REMOTE SHUTDOWN				
	NONE			
ITS SPECIFICATION 3.3.5 - LOSS OF POWER (LOP) DIESEL GENERATOR (DG) START INSTRUMENTATION				
LA.1	Relocates information about the number of channels and the number of channels required to trip for each RPS and ESFAS Function a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases)	T 3.5-3, No.3a T 3.5-3, No.3b	3.3.5 RA-A.1 3.3.5 RA-B.1 5.5.13	Type 1
LA.2	Relocates periodic testing of the 480 V emergency bus undervoltage alarm to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR 7.5.2.1.12) because alarms are attendant instrumentation requirements in the ITS definition of operability.	T 4.1-1, No.29c	3.3.5.2 SR 3.3.5.3 SR 3.3.5.4 SR	Type 3
LA 3	Relocate the CTS nominal trip setpoints (i.e.; as-left limits) to plant procedures because IP2 ITS will use the “Allowable Value” instead of the normal trip setpoints as the limiting safety system setting (LSSS) that is required to be in the Technical Specifications by 10 CFR 50.36(c)(1).	T3.5-1	3.3.5.5SR	Type 3
ITS SPECIFICATION 3.3.6 - CONTAINMENT PURGE SYSTEM AND PRESSURE RELIEF LINE ISOLATION INSTRUMENTATION				
LA.1	Relocates information about the number of channels and the number of channels required to trip for each RPS and ESFAS Function to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases).	T 3.5-3 T 3.5-4	3.3.6 LCO 5.5.13	Type 1

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Section 3.3

Categories for LA-Table

- 1 - Details of system design and system description including design limits
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- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
ITS SECTION 3.3.7 - CONTROL ROOM VENTILATION SYSTEM (CRVS) ACTUATION INSTRUMENTATION				
	NONE			

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Section 3.3

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.4 – REACTOR COOLANT SYSTEM (RCS)

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
ITS SPECIFICATION 3.4.1 - RCS PRESSURE, TEMPERATURE, AND FLOW DEPARTURE FROM NUCLEATE BOILING (DNB) LIMITS				
LA.1	Relocates limits (i.e., acceptance criteria) for RCS temperature (Tave) and pressurizer pressure from the Technical Specifications to the Core Operating Limits Report (COLR).	3.1.G	3.4.1 LCO 5.6.5 LCO	Type 1
ITS SPECIFICATION 3.4.2 - RCS MINIMUM TEMPERATURE FOR CRITICALITY				
	NONE			
ITS SPECIFICATION 3.4.3 - RCS PRESSURE AND TEMPERATURE (P/T) LIMITS				
LA.1	Relocates details about the application of the RCS pressure and temperature limits to the Bases for ITS LCO 3.4.3.	3.1.B 4.3	3.4.3 LCO 5.5.13	Type 3
LA.2	Relocates information that heatup and cooldown rates are based on the average temperature over a one hour period and that limit lines for cooldown rates between those presented may be obtained by interpolation to the Bases for ITS LCO 3.4.3.	3.1.B.1	3.4.3 LCO 3.4.3.1 SR 5.5.13	Type 3
ITS SPECIFICATION 3.4.4 - RCS LOOPS - MODES 1 AND 2				
	NONE			
ITS SPECIFICATION 3.4.5 - RCS LOOPS MODE 3				
	NONE			

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
ITS SPECIFICATION 3.4.6 - RCS LOOPS MODE 4				
LA.1	Not Used.	NA	NA	
ITS SPECIFICATION 3.4.7 - RCS LOOPS MODE 5, LOOPS FILLED				
LA.1	Not Used.	NA	NA	
ITS SPECIFICATION 3.4.8 - RCS LOOPS MODE 5, LOOPS NOT FILLED				
	NONE			
ITS SPECIFICATION 3.4.9 - PRESSURIZER				
	NONE			
ITS SPECIFICATION 3.4.10 - PRESSURIZER SAFETY VALVES				
LA.1	Relocates requirements needed to satisfy ASME Code for at least one pressurizer code safety valve or an opening greater than or equal to the size of one code safety valve flange when below the LTOP Applicability temperature to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.4.E).	3.1.A.3.a	3.4.10 LCO 3.4.12 LCO	Type 4
LA.2	Retains requirement for periodic verification of pressurizer safety valve settings but the required Frequency is relocated to the Inservice Test (IST) Program.	T 4.1-3, No.3 T 1-1	3.4.10.1 SR 5.5.6	Type 4
LA.3	Not Used. CTS Table 4.1-1, Item 34, was relocated to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.4.F) by ITS 3.3.3, DOC LA.1.	NA	NA	

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Section 3.4

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
ITS SPECIFICATION 3.4.11 - PRESSURIZER POWER OPERATED RELIEF VALVES (PORVs)				
LA.1	Relocates requirements for periodic calibration of the PORV actuation and reclosure setpoints to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR 4.3.4.3).	T 4.1-1, No.36	3.4.11 LCO	Type 3
LA.2	Relocates monitoring, testing and calibration of the position indication limit switches for the PORVs and block valves to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.4.G) and will be implemented by plant procedures.	T 4.1-1, No.32	3.4.11 LCO	Type 3
LA.3	Relocates information about the PORVs including the valve numbers and clarify that the block valves may be either open or closed to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases for LCO 3.4.11).	3.16.A.2 3.16.A.3	3.4.11 LCO	Type 1
ITS SPECIFICATION 3.4.12 - LOW TEMPERATURE OVERPRESSURE PROTECTION (LTOP)				
LA.1	Not Used.	NA	NA	
LA.2	Relocates requirements for testing of the PORV backup nitrogen system to a licensee document controlled by 10 CFR 50.59 (TRM 3.4.H).	4.18.E	3.4.12	Type 3
LA.3	Not Used.	NA	NA	
LA.4	Relocates description and requirements channel Operability for the Power Operated Relief Valves (i.e., Overpressure Protection System (OPS) to a licensee document controlled by 10 CFR 50.59 (i.e., Bases for LCO 3.4.12).	T 3.5-3, No.5	3.4.12.a LCO 5.5.13	Type 1
ITS SPECIFICATION 3.4.13 - RCS OPERATIONAL LEAKAGE				
	NONE			

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Section 3.4

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
ITS SPECIFICATION 3.4.14 - RCS PRESSURE ISOLATION VALVE (PIV) LEAKAGE				
LA.1	Relocates list of Event V PIVs to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases and UFSAR 5.2).	3.1.F.2.b.(1)	3.4.14.1 SR 5.5.13	Type 1
LA.2	Relocates details about how periodic verification of PIV leakage is performed to the ITS Bases for SR 3.4.14.1.	3.1.F.2.b.(1) 4.16.A.5	3.4.14.1 SR 5.5.13	Type 3
ITS SPECIFICATION 3.4.15 - RCS LEAKAGE DETECTION INSTRUMENTATION				
LA.1	Relocates requirement for a monthly visual inspection of the weirs used in the containment fan cooler condensate flow monitoring system to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR Section 4.2.7).	T 4.1-1, No.21e	3.4.15.3 SR	Type 3
ITS SPECIFICATION 3.4.16 - RCS SPECIFIC ACTIVITY				
LA.1	Relocates requirements for periodic measurement of tritium in the reactor coolant to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.4.K).	T 4.1-2, No.1	3.4.16	Type 3

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ITS SECTION 3.5 – EMERGENCY CORE COOLING SYSTEMS (ECCS)

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
ITS SPECIFICATION 3.5.1 - ACCUMULATORS				
LA.1	ITS maintains requirement that accumulator level and pressure must be maintained within limits; however, requirements for periodic calibration of accumulator level and pressure instruments relocated to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.3).	T 4.1-1, No.22a T 4.1-1, No.22b	3.5.1.2 SR 3.5.1.3 SR 5.5.13	Type 3
ITS SPECIFICATION 3.5.2 - ECCS – OPERATING				
LA.1	Establishes ECCS requirements in terms of ECCS trains and the details about each of the ECCS subsystems and what constitutes a trains is relocated to the ITS 3.5.2 Bases.	3.3.A.2.d 3.3.A.2.e 3.3.A.2.f	3.5.2 LCO	Type 1
LA.2	ITS maintains the requirement that ECCS hot leg injection valves (856B and 856F) are closed with motor operators de-energized; however, the implementing detail that "circuit breakers at the MCC must be locked out" is relocated to licensee controlled documents (i.e., Bases for SR 3.5.2.1).	3.3.A.1.h	3.5.2.1 SR 5.5.13	Type 3
LA.3	Relocates implementing details regarding safety injection system test initial conditions, test performance and test acceptance criteria to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases).	4.5.A.1.a 4.5.A.1.d	3.5.2.4 SR 3.5.2.5 SR 3.5.2.6 SR	Type 3
ITS SPECIFICATION 3.5.3 - ECCS - SHUTDOWN				
	NONE			

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
ITS SPECIFICATION 3.5.4 - REFUELING WATER STORAGE TANK (RWST)				
	NONE			

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Categories for LA-Table

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- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

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ITS SECTION 3.6 – CONTAINMENT SYSTEMS

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
ITS SPECIFICATION 3.6.1 - CONTAINMENT				
LA.1	Relocates the details on CTS 1.7 and 3.6.A.1 on containment integrity to a licensee document controlled by 10 CFR 50.59 (i.e., Bases for ITS LCO 3.6.1).	1.7 3.6.A.1	3.6.1 LCO 3.6.2 3.6.3 3.6.9 3.6.10	Type 1
ITS SPECIFICATION 3.6.2 - CONTAINMENT AIR LOCKS				
	NONE			
ITS SPECIFICATION 3.6.3 - CONTAINMENT ISOLATION VALVES				
LA.1	Relocates lists of Containment Isolation Valves to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR Table 5.2-1). (Superceded in part by Amendment 223.)	1.7 3.6.A.1 4.4 T 3.6-1 T 4.4-1	3.6.3	Type 1
LA.2	Not Used.	NA	NA	
LA.3	Relocates acceptance criteria for closing times for containment purge supply and exhaust isolation valves and the pressure relief line isolation valves to a licensee document controlled by 10 CFR 50.59 (i.e., UFSAR, Section 5.2.4).	3.6.3.2.a	3.6.3.5 SR	Type 1
LA.4	Not Used.	NA	NA	

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Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
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- 4 - Administrative requirements redundant to regulations

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
ITS SPECIFICATION 3.6.4 - CONTAINMENT PRESSURE				
	NONE			
ITS SPECIFICATION 3.6.5 - CONTAINMENT AIR TEMPERATURE				
	NONE			
ITS SPECIFICATION 3.6.6 - CONTAINMENT SPRAY SYSTEM AND CONTAINMENT FAN COOLER UNIT (FCU) SYSTEM				
LA.1	Relocates the description of how the fan cooler unit flow test is initiated to the ITS Bases.	4.5.D.1	3.6.6.2 SR	Type 3
ITS SPECIFICATION 3.6.7 - RECIRCULATION pH CONTROL SYSTEM				
	NONE			
ITS SPECIFICATION 3.6.8 - HYDROGEN RECOMBINERS				
	NONE			
ITS SPECIFICATION 3.6.9 - ISOLATION VALVE SEAL WATER (IVSW) SYSTEM				
	NONE			
ITS SPECIFICATION 3.6.10 - WELD CHANNEL AND PENETRATION PRESSURIZATION SYSTEM (WCPPS)				
LA.1	Relocates the allowance “ that the affected (inoperable) portion (of the WC&PPS) may be disconnected from the system if it is determined that it is not repairable by any practicable means” to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases)	3.3.D.2.C	3.6.10 LCO	Type 3

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Categories for LA-Table

- 1 - Details of system design and system description including design limits
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ITS SECTION 3.7 – PLANT SYSTEMS

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
ITS SPECIFICATION 3.7.1 - MAIN STEAM SAFETY VALVES (MSSVs)				
LA.1	Retains requirement for periodic verification of main steam safety valve settings but the required Frequency is relocated to the Inservice Test (IST) Program.	T 4.1-3, No.4	3.7.1.1 SR	Type 4
ITS SPECIFICATION 3.7.2 - MAIN STEAM ISOLATION VALVES (MSIVs) AND MAIN STEAM CHECK VALVES (MSCVs)				
LA.1	Retains requirement for periodic verification of main steam isolation valve closure time but the required Frequency is relocated to the Inservice Test (IST) Program.	4.7	3.7.2.1 SR	Type 4
ITS SPECIFICATION 3.7.3 - MAIN FEEDWATER ISOLATION				
	NONE			
ITS SPECIFICATION 3.7.4 - ATMOSPHERIC DUMP VALVES (ADVs)				
	NONE			
ITS SPECIFICATION 3.7.5 - AUXILIARY FEEDWATER (AFW) SYSTEM				
LA.1	Not Used.	NA	NA	
LA.2	Retains requirement for periodic verification of the capability of each auxiliary feedwater pump to deliver full flow but the required Frequency is relocated to the Inservice Test (IST) Program.	4.8.A.2	3.7.5.2 SR	Type 4
LA.3	Relocates the requirement that an Operable AFW pump must be "capable of pumping a minimum 380 gpm" to the Bases for ITS 3.7.5.	3.4.A.2	3.7.5 LCO	Type 1

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Section 3.7

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
ITS SPECIFICATION 3.7.6 - CONDENSATE STORAGE TANK				
	NONE			
ITS SPECIFICATION 3.7.7 - COMPONENT COOLING WATER (CCW) SYSTEM				
LA.1	Establishes CCW requirements in terms of CCW trains and relocates details about each of the CCW trains and what constitutes a train to the ITS 3.7.7 Bases.	3.3.E.1.a 3.3.E.1.c	3.7.7 LCO	Type 1
ITS SPECIFICATION 3.7.8 - SERVICE WATER (SW) SYSTEM				
LA.1	Relocates to the ITS Bases the information that isolation must be maintained between the essential and nonessential headers except as specified in a Note to the LCO 3.7.8 Applicability.	3.3.F.3	3.7.8 RA-Note	Type 2
ITS SPECIFICATION 3.7.9 - ULTIMATE HEAT SINK (UHS)				
LA.1	Relocates requirements for using specific instruments to monitor service water inlet temperature and the requirement for accelerated monitoring of UHS temperature whenever the UHS temperature is approaching the LCO limit of 95°F to a licensee document controlled by 10 CFR 50.59 (i.e., the TRM 3.3.C).	3.3.F.5 T 4.1-1, No.45	3.7.9.1 SR	Type 3
ITS SPECIFICATION 3.7.10 - CONTROL ROOM VENTILATION SYSTEM (CRVS)				
LA.1	Relocates the detail that the monthly test of the CRVS booster fans is performed "by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers" to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases for SR 3.7.10.1).	4.5.E.1	3.7.10.1 SR	Type 3
ITS SPECIFICATION 3.7.11 – SPENT FUEL PIT WATER LEVEL				
LA.1	Relocates information that the required minimum level of 23 feet over the top of irradiated fuel assemblies seated in the storage racks corresponds to an elevation of 92' 2" to the LCO Section of the Bases for ITS LCO 3.7.11.	3.8.C.2	3.7.11 LCO	Type 1

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Section 3.7

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
ITS SPECIFICATION 3.7.12 - SPENT FUEL PIT BORON CONCENTRATION				
	NONE			
ITS SPECIFICATION 3.7.13 - SPENT FUEL PIT STORAGE				
LA.1	Relocates description information in CTS 3.8.D.1.b (i.e., a description of information contained on CTS Figure 3.8-3) and CTS 3.8.D.1.d (i.e., a description of information contained on CTS Figure 3.8-1) to the ITS LCO 3.7.13 Bases.	3.8.D.1.b 3.8.D.1.d F 3.8-1 F 3.8-3	3.7.13 LCO F 3.7.13-4 F 3.7.13-5	Type 1
ITS SPECIFICATION 3.7.14 - SECONDARY SPECIFIC ACTIVITY				
	NONE			

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.8 – ELECTRICAL POWER SYSTEMS

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
ITS SPECIFICATION 3.8.1 - AC SOURCES - OPERATING				
LA.1	Relocates requirement that Operability of two qualified circuits between the offsite transmission network and the onsite AC electrical power distribution system requires at least two 138 kV lines from offsite sources into the Buchanan Substation to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases). Additionally, relocates details about what constitutes a qualified circuits between the offsite transmission network and the onsite AC electrical power distribution system to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases and IP2 UFSAR).	3.7.A.1 3.7.A.2 3.7.A.3	3.8.1 LCO	Type 1
LA.2	Superceded by Amendment 218.	NA	NA	
LA.3	Relocates the acceptance criteria that the DG must “assume the required load within 60 seconds after the initial start signal” and the test condition that “certain safeguards valves will be closed and made inoperable” to prevent Safety Injection flow to the core to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases and IP2 UFSAR 8.1.2.2).	4.6.A.3	3.8.1.12 SR	Type 1
ITS SPECIFICATION 3.8.2 - AC SOURCES - SHUTDOWN				
	NONE			
ITS SPECIFICATION 3.8.3 - DIESEL FUEL OIL AND STARTING AIR				
LA.1	Relocates the clarification that the DG fuel oil reserve must be stored “at the Buchanan Substation, or onsite other than the normal supply tanks” to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases).	3.7.A.5	3.8.3 LCO Bases	Type 2

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Section 3.8

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
ITS SPECIFICATION 3.8.4 - DC SOURCES - OPERATING				
LA.1	Relocates the requirement that each battery shall have a "visual inspection of the plates" to the program established by Technical Specification 5.5.15, "Battery Monitoring and Maintenance Program."	4.6.C.4	3.8.4 5.5.15	Type 3
ITS SPECIFICATION 3.8.5 - DC SOURCES - SHUTDOWN				
	NONE			
ITS SPECIFICATION 3.8.6 - BATTERY PARAMETERS				
LA.1	Relocates requirement that each battery shall be subjected to a 24 hour equalizing charge every 3 months to a licensee document controlled by 10 CFR 50.59 (i.e., program established by Technical Specification 5.5.15, "Battery Monitoring and Maintenance Program").	4.6.C.2	3.8.6 5.5.15	Type 3
LA.2	Relocates requirement that new data be compared with old to detect signs of abuse or deterioration every time surveillance data for batteries is recorded to a licensee document controlled by 10 CFR 50.59 (i.e., program established by Technical Specification 5.5.15, "Battery Monitoring and Maintenance Program").	4.6.C.3	3.8.6.2 SR 3.8.6.3 SR 5.5.15	Type 3
LA.3	Relocates requirement that battery specific gravity is measured and recorded every month to a licensee document controlled by 10 CFR 50.59 (i.e., program established by Technical Specification 5.5.15, "Battery Monitoring and Maintenance Program").	4.6.C.1	3.8.6 5.5.15	Type 3
ITS SPECIFICATION 3.8.7 - INVERTERS - OPERATING				
	NONE			
ITS SPECIFICATION 3.8.8 - INVERTERS - SHUTDOWN				
	NONE			

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Section 3.8

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
ITS SPECIFICATION 3.8.9 - DISTRIBUTION SYSTEMS - OPERATING				
LA.1	Relocates details about which buses are covered by ITS LCO 3.8.9 and the stipulation that specific bus tie breakers must be open to the Bases for ITS LCO 3.8.9, specifically Table B 3.8.9-1.	3.7.A.4	T B3.8.9-1	Type 1
ITS SPECIFICATION 3.8.10 - DISTRIBUTION SYSTEMS - SHUTDOWN				
	NONE			

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.9 - REFUELING OPERATIONS

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
ITS SPECIFICATION 3.9.1 - BORON CONCENTRATION				
LA.1	Relocates limits for shutdown margin and/or boron concentration that must be maintained in Mode 6 from the Technical specifications to the Core Operating Limits Report (COLR).	3.8.B.2	3.9.1 LCO	Type 1
ITS SPECIFICATION 3.9.2 - NUCLEAR INSTRUMENTATION				
LA.1	Relocates information that control room indication is a required attribute of Operability for the source range monitors when in Mode 6 to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases).	3.8.A.2	3.9.2	Type 2
ITS SPECIFICATION 3.9.3 – CONTAINMENT PENETRATIONS				
	NONE			
ITS SPECIFICATION 3.9.4 - RESIDUAL HEAT REMOVAL (RHR) AND COOLANT CIRCULATION - HIGH WATER LEVEL				
LA.1	Relocates the requirement for periodic verification of the RHR pump flow instrumentation to a licensee document controlled by 10 CFR 50.59 (i.e., the TRM 3.3.B).	T 4.1-1, No.13	3.9.4.1 SR	Type 3
ITS SPECIFICATION 3.9.5 - RESIDUAL HEAT REMOVAL (RHR) AND COOLANT CIRCULATION - LOW WATER LEVEL				
LA.1	Relocates the requirement for periodic verification of the RHR pump flow instrumentation to a licensee document controlled by 10 CFR 50.59 (i.e., the TRM 3.3.B).	T 4.1-1, No.13 T 1-1	3.9.5.1 SR	Type 3

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Section 3.9

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
ITS SPECIFICATION 3.9.6 - REFUELING CAVITY WATER LEVEL				
	NONE			

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 4.0 - DESIGN FEATURES

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
LA.1	Relocates Maps Defining Unrestricted Areas of Radioactive Gaseous and Liquid Effluents to the Offsite Dose Calculation Manual (ODCM).	5.1.B F 5.1-1 A F 5.1-1 B	4.0 5.5.1	Type 1
LA.2	Relocates descriptive information about the design and seismic qualification of the reactor containment, containment penetrations, and containment cooling systems to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR 5.1.1).	5.2.A 5.2.B 5.2.C 5.3.B 5.4.1 5.4.2	4.0	Type 1
LA.3	Relocates the information that "each fuel rod shall have a nominal active fuel length of 144 inches" and that the silver-indium-cadmium alloy in control rods is 142 inches length is relocated to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR Table 3.2-7).	5.3.A.1 5.3.A.5	4.2.1 4.2.2	Type 1

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 5.0 - ADMINISTRATIVE CONTROLS

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
ITS SPECIFICATION 5.1 - RESPONSIBILITY				
LA.1	Relocates specification that the corporate officer with direct responsibility for the plant is responsible for overall facility activities is relocated to a licensee document controlled by 10 CFR 50.59 (i.e., UFSAR, Section 12.1, Organization and Responsibility).	6.1.1 6.1.2	5.1.1	Type 1
ITS SPECIFICATION 5.2 – ORGANIZATION				
LA.1	Superseded by CTS Amendments 231 and 235.	NA	NA	
LA.2	Relocates CTS requirements that duplicate requirements imposed by 10 CFR 50.54 (m)(2) because requirements in 10 CFR 50 do not need to be repeated in the ITS.	6.2.2.e T 6.2-1	5.2	Type 4
LA.3	Relocates CTS requirements that duplicate requirements imposed by 10 CFR 50.54 (m)(2) because requirements in 10 CFR 50 do not need to be repeated in the ITS.	T 6.2-1	5.2	Type 4
ITS SPECIFICATION 5.3 – UNIT STAFF QUALIFICATIONS				
LA.1	Relocates requirement for a retraining and replacement training program for the plant staff that meets or exceeds the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and 10 CFR 55 to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR 12.2).	6.4.1	5.3	Type 3

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
ITS SPECIFICATION 5.4 – PROCEDURES				
LA.1	Relocates CTS 6.8.2 which is a statement that each procedure and administrative policy of CTS 6.8.1 and any changes to them shall be reviewed and approved for implementation in accordance with the quality assurance program described or referenced in the Updated FSAR.	6.8.1 6.8.2	5.4	Type 3
LA.2	Relocates the detail that Quality Assurance Program for effluent and environmental monitoring use "the guidance in Regulatory Guide 1.21, Revision 1, April 1974 and Regulatory Guide 4.1, Revision 1, April 1975" to the ODCM.	6.8.1.d	5.4	Type 4
ITS SPECIFICATION 5.5 – PROGRAMS AND MANUALS				
ITS SPECIFICATION 5.5.1 - OFFSITE DOSE CALCULATION MANUAL (ODCM)				
LA.1	Relocates to the ODCM those CTS definitions for the following terms that are not used in the IP2 ITS but are used in the Offsite Does Calculation Manual (ODCM).	1.0	5.5.1	Type 2
LA.2	Relocates the Radiological Environmental Monitoring Program to the Offsite Does Calculation Manual (ODCM).	4.11 6.9.2.e 6.9.2.f	5.5.1.c	Type 3
ITS SPECIFICATION 5.5.2 - PRIMARY COOLANT SOURCES OUTSIDE CONTAINMENT				
LA.1	Relocates testing details required for the implementation of ITS 5.5.2, Primary Coolant Sources Outside Containment, to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR 9.3.5).	4.4.H Lic 2.L	5.5.2	Type 3

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
ITS SPECIFICATION 5.5.3 - RADIOACTIVE EFFLUENT CONTROLS PROGRAM				
LA.1	Relocates the Process Controls Program, Solid Radioactive Waste, and Uranium Fuel Cycle Dose Commitment to the ODCM.	1.18 1.21 3.9.D 4.10.C 4.10.D	5.5.3 5.6 5.5.1	Type 1
LA.2	Relocates compensatory actions and regulatory reporting requirements if limits for offsite doses resulting from the release of radioactive materials in liquid effluents are exceeded to the ODCM.	3.9.A.1.b 3.9.A.3.b 3.9.A.4.b 3.9.B.1.b 3.9.B.3.b 3.9.B.4.b 3.9.B.5.b 3.9.C.2 4.10.A.1 4.10.E	5.5.3.b 5.5.3.d 5.5.1 5.6	Type 3
LA.3	Relocates specific requirements for Operability, Allowable values, surveillance testing, and compensatory actions for instrumentation used to monitor radioactive liquid and gaseous effluents to the ODCM and a licensee document controlled by 10 CFR 50.59 (i.e., IP2 TRM), as appropriate.	3.9.A.2 3.9.B.2 T 3.9-1 T 3.9-2, No.3 T 3.9-2, No.4 T 3.9-2, No.5 T 4.10-2 T 4.10-4	5.5.3.a	Type 3
LA.4	Relocates specific details for the Radioactive Liquid and Gaseous Waste Sampling and Analysis Program to the Offsite Dose Calculation Manual (ODCM).	4.10.A 4.10.B T 4.10-1 T 4.10-3	5.5.3.e	Type 3

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Section 5.0

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
ITS SPECIFICATION 5.5.4 - COMPONENT CYCLIC OR TRANSIENT LIMIT				
	NONE			
ITS SPECIFICATION 5.5.5 - REACTOR COOLANT PUMP FLYWHEEL INSPECTION PROGRAM				
	NONE			
ITS SPECIFICATION 5.5.6 - INSERVICE TESTING PROGRAM				
	NONE			
ITS SPECIFICATION 5.5.7 - STEAM GENERATOR (SG) TUBE SURVEILLANCE PROGRAM				
LA.1	Not Used.	NA	NA	
ITS SPECIFICATION 5.5.8 - SECONDARY WATER CHEMISTRY PROGRAM				
	NONE			
ITS SPECIFICATION 5.5.9 - VENTILATION FILTER TESTING PROGRAM (VFTP)				
	NONE			

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
ITS SPECIFICATION 5.5.10 - EXPLOSIVE GAS AND STORAGE TANK RADIOACTIVITY MONITORING PROGRAM				
LA.1	Relocates specific requirements about which tanks are covered by the limits on radioactive content, actions if limits for explosive gas or radioactive material content are not met and requirements for periodic verification that limits are not being exceeded to a licensee document controlled by 10 CFR 50.59 (i.e., the TRM).	3.9.A.5 3.9.B.6 3.9.B.7 4.10.A.6 4.10.B.7 4.10.B.8 T 3.9-2, No.1 T 3.9-2, No.2	5.5.10.a 5.5.10.b 5.5.10.c	Type 3
ITS SPECIFICATION 5.5.11 - DIESEL FUEL OIL TESTING PROGRAM				
	NONE			
ITS SPECIFICATION 5.5.12 - TECHNICAL SPECIFICATIONS (TS) BASES CONTROL PROGRAM				
	NONE			
ITS SPECIFICATION 5.5.13 - SAFETY FUNCTION DETERMINATION PROGRAM (SFDP)				
	NONE			
ITS SPECIFICATION 5.5.14 - CONTAINMENT LEAKAGE RATE TESTING PROGRAM				
LA.1	Relocates requirements to inspect the containment before testing, to close isolation valves by normal method before testing, to use required test medium, and to post test reporting requirements to the program established by Technical Specification 5.5.14, "Containment Leakage Rate Test Program."	4.4.A.1.d 4.4.A.1.e 4.4.F 4.4.G	5.5.14	Type 3

Discussion of Change	Summary of Change	CTS Section	ITS Section	Category
LA.2	Recognizes that requirement for repressurization of air lock seals following any opening of an air lock door is part of the program required by ITS 5.5.14 and a condition of Operability of the airlocks with appropriate clarification provided in the Bases.	4.4.C.2	5.5.14 3.6.2	Type 3
ITS SPECIFICATION 5.5.15 – BATTERY MONITORING AND MAINTENANCE PROGRAM				
	NONE			
ITS SPECIFICATION 5.6 - REPORTING REQUIREMENTS				
LA.1	Eliminates requirements that duplicate 10 CFR 50.73.	6.6	5.6	Type 4
LA.2	Relocates requirement for a Startup Report to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR 13.6.2).	6.9.1.1 6.9.1.2	5.6	Type 3
LA.3	Relocates details about what is included in the Annual Radiological Environment Operating Report to the Offsite Dose Calculation Manual (ODCM).	6.9.1.5	5.6.2	Type 3
LA.4	Relocates details about what is included in the annual Radiological Effluent Release Report to the Offsite Dose Calculation Manual (ODCM).	6.9.1.6	5.6.3 5.5.1	Type 3
LA.5	Relocates requirement that major changes to the radioactive waste systems (liquid, gaseous and solid) shall be reported to the Commission in the Annual Radioactive Effluent Release Report to the Offsite Dose Calculation Manual (ODCM) (i.e., dose assessment and reporting requirements).	6.16	5.6 5.5.1	Type 3
LA.6	Not Used.	NA	NA	
LA.7	Relocates description of the design requirements and record keeping requirements for Environmental Qualification to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR 7.1.3).	6.13.1 6.13.2	5.6 5.5.13	Type 1

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Section 5.0

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations