

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 1.0 - USE AND APPLICATION

Discussion of Change	Summary of Change	ITS Section	CTS Section
M.1	Adds New Technical Specification Definitions. Any technical changes that result from the adoption of these definitions are identified and justified in the DOCs associated with the applicable LCOs.	1.0	1.1
M.2	Creates a distinction between a refueling condition and core alterations so that LCO requirements and required actions can be established that differentiate between refueling conditions (i.e., one or more reactor vessel head closure bolts is less than fully tensioned) with and without core alterations in progress.	1.2.5	1.1 T 1.1-1
M.3	Establishes the Refueling Operation Condition (i.e., Mode 6) when one or more reactor vessel head closure bolts less than fully tensioned (versus when the vessel head is completely unbolted).	1.2.5	1.1 T 1.1-1

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 2.0 - SAFETY LIMITS (SLs)

Discussion of Change	Summary of Change	CTS Section	ITS Section
M.1	Adds explicit safety limit for departure from nucleate boiling (DNB) that is implicitly required by existing limits on combinations of reactor power, reactor pressure and reactor temperature.	2.2 F 2.1-1	2.1.1
M.2	Establishes more explicit requirements for prompt restoration of compliance with SLs and more explicit requirements for a prompt reactor shutdown if SLs are violated.	6.7.1.a	2.2.1 2.2.2

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.0 - LCO APPLICABILITY AND SR APPLICABILITY

Discussion of Change	Summary of Change	CTS Section	ITS Section
M.1	Adopts ITS LCO 3.0.4 and SR 3.0.4, including TSFT-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. IP2 CTS currently has no restrictions on changing Modes when an LCO is not met.	3.0 4.0	3.0.4 LCO 3.0.4 SR
M.2	Clarifies that the 25% extension to the SR Frequency applies only to each performance after the initial performance of an SR or Action and prohibits using this allowance for SRs or Actions that are performed only once.	4.0.1	3.0.2 SR

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS**ITS SECTION 3.1 – REACTIVITY CONTROL SYSTEMS**

Discussion of Change	Summary of Change	CTS Section	ITS Section
ITS SPECIFICATION 3.1.1- SHUTDOWN MARGIN (SDM)			
M.1	Establishes the Applicability for Shutdown Margin (SDM) as Mode 2 with keff less than 1.0 and in Modes 3, 4 and 5. Requirements for SDM are controlled by LCO 3.9.1 when in Mode 6 and by LCO 3.1.5 and LCO 3.1.6 when in Modes 1 and Mode 2 with Keff greater than or equal to 1.0.	3.10.1	3.1.1 APP
M.2	Adds requirement to initiate boration of the RCS within 15 minutes of the determination that shutdown margin (SDM) requirement is not met.	3.10.1	3.1.1 RA-A.1 3.0.1
M.3	Adds requirement to verify that SDM is within the limits specified in the COLR every 24 hours.	3.10.1 T 4.1-1, No.2	3.1.1.1 SR
ITS SPECIFICATION 3.1.2 - CORE REACTIVITY			
M.1	Adds an LCO limit for the maximum difference between predicted versus measured core reactivity during power operation and requirements for a evaluation of the core design and safety analysis and the establishment of appropriate operating restrictions if this limit is exceeded.	4.9	3.1.2 LCO 3.1.2 APP 3.1.2 RA-A.1 3.1.2 RA-A.2 3.1.2 RA-B.1
M.2	Adds a specific Frequency for verification that the difference between predicted versus measured core reactivity during power operation must be performed prior to entering MODE 1 following each refueling as an initial check on core conditions and design calculations at BOC. This Surveillance must be performed again within the initial 60 EFPD after entering MODE 1 following each refueling and every 31 EFPD thereafter.	4.9	3.1.2.1 SR

Discussion of Change	Summary of Change	CTS Section	ITS Section
ITS SPECIFICATION 3.1.3 - MODERATOR TEMPERATURE COEFFICIENT (MTC)			
M.1	Adds a new requirement for a lower limit for MTC with the limit specified in the Core Operating Limits Report (COLR) because a lower limit for MTC is an assumption in the accident analysis.	3.1.C.1	3.1.3 APP 3.1.3 LCO 3.1.3 RA-C.1
M.2	Adds an explicit requirement for verification of the MTC maximum upper limit following refueling.	3.1.C.1	3.1.3.1 SR
M.3	Adds new requirement to verify MTC is within the lower limit once each cycle after exceeding the equivalent of an equilibrium RTP all rods out (ARO) boron concentration of 300 ppm. Periodic re-verification of the MTC lower limit is required if the initial verification indicates that the MTC lower limit could be exceeded before the end of core life.	3.1.C.1	3.1.3.2 SR
ITS SPECIFICATION 3.1.4 - ROD GROUP ALIGNMENT LIMITS			
M.1	Superseded by CTS Amendment 234.	NA	NA
M.2	Adds explicit requirement to verify within one hour of determination any rod not within alignment limits that SDM remains within required limits or to initiate action to restore SDM. Requires completion of an analysis supporting continued operation within 5 days (versus 30 days) when one rod not within alignment limits. Requires completion of a reactor shutdown within 6 hours of determination that a second rod is not within alignment limits (versus CTS requirement for initiation of reactor shutdown within 8 hours).	3.10.1 3.10.5.3 3.10.7.2 3.10.7.3	3.1.4 RA-B.2.1.1 3.1.4 RA-B.2.1.2 3.1.4 RA-B.2.3 3.1.4 RA-B.2.6 3.1.4 RA-D.1.1 3.1.4 RA-D.1.2 3.1.4 RA-D.2
M.3	Adds explicit requirement to verify within one hour of determination one or more control rods are inoperable that SDM remains within required limits or to initiate action to restore SDM. ITS requires reactor shutdown whenever one or more control rods inoperable (i.e., eliminates the allowance in CTS 3.10.7.3 for continued operation with one inoperable control rod if analysis performed within 30 days).	3.10.1 3.10.7.2 3.10.7.3	3.1.4 RA-A.1.1 3.1.4 RA-A.1.2 3.1.4 RA-A.2
M.4	Requires a reduction in reactor power within 2 hours of the determination that a control rod is not within alignment limits regardless of the status of power distribution limits and/or status of the verification of core peaking factors.	3.10.3 3.10.5.2	3.1.4 RA-B.2.2

Discussion of Change	Summary of Change	CTS Section	ITS Section
M.5	Increases Frequency for verification that rod drop times are within specified limits from the refueling interval (i.e., every 24 months) to "prior to reactor criticality after each removal of the reactor head."	3.10.8 T 4.1-3, No.1	3.1.4.3 SR
M.6	Adds an explicit requirement that the plant be placed in a condition in which the LCO requirements are not applicable if the requirements and the specified compensatory actions are not met.	3.10.5 3.10.7	3.1.4 RA-C.1
M.7	Requires a reduction in reactor power to less than or equal to 75% RTP within 2 hours when a rod is not within required alignment limits.	3.10.5.2	3.1.4 RA-B.2.2
M.8	Superseded by CTS Amendment 234.	NA	NA
ITS SPECIFICATION 3.1.5 - SHUTDOWN BANK INSERTION LIMITS			
M.1	Adds explicit Required Actions for the Conditions when available SDM may be significantly reduced if any shutdown bank is not within the insertion limit and sufficient SDM is not otherwise met.	3.10.4.1	3.1.5 RA-A.1.1 3.1.5 RA-A.1.2 3.1.5 RA-A.2 3.1.5 RA-B.1
ITS SPECIFICATION 3.1.6 - CONTROL BANK INSERTION LIMITS			
M.1	Adds explicit Required Actions for the Conditions when available SDM may be significantly reduced if any control bank is not within the insertion limit and sufficient SDM is not otherwise met.	3.10.4.2	3.1.6 RA-A.1.1 3.1.6 RA-A.1.2 3.1.6 RA-A.2 3.1.6 RA-B.1.1 3.1.6 RA-B.1.2 3.1.6 RA-B.2 3.1.6 RA-C.1
M.2	Adds explicit requirements for periodic verification that analysis assumptions for control rod position supporting shutdown margin requirements are being met.	3.10.4.2 T4.1-1, No10	3.1.6.1 SR 3.1.6.2 SR 3.1.6.3 SR

Discussion of Change	Summary of Change	CTS Section	ITS Section
ITS SPECIFICATION 3.1.7 - ROD POSITION INDICATION			
M.1	Increases Frequency for calibration of analog rod position indication channels from the refueling interval (i.e., every 24 months) to "prior to reactor criticality after each removal of the reactor head."	T 4.1-1, No.9	3.1.7.1 SR
M.2	Eliminates an allowance that a rod position indication channel is not considered to be inoperable during calibration.	3.10.6.2	3.1.7
M.3	Eliminates the option of using the excore detectors to verify the position of a control rod with an inoperable position indication channel.	3.10.6.1	3.1.7 RA-A.1 3.1.7 RA-C.1
M.4	Not Used	NA	NA
M.5	Establishes a completion time of 4 hours to verify rod position for rods with inoperable position indicators subsequent to rod motion exceeding 24 steps.	3.10.6.1.a	3.1.7 RA-C.1
M.6	Adds an explicit statement that the plant be in Mode 3 in 6 hours if requirements for inoperable individual rod position indication channels or demand position indication channels are not met. This reduces the amount of time allowed to reach Mode 3 from 7 hours to 6 hours.	3.0.1 3.10.6	3.1.7 RA-E.1
M.7	Superceded by CTS Amendment 234.	NA	NA
M.8	Establishes acceptance criteria for IRPI calibration accuracy of plus or minus 12 steps consistent with IRPI accuracy assumptions used in WCAP-15902, "Conditional Extension of the Rod Misalignment Technical Specification for Indian Point Unit 2," and Safety Evaluation by the Office of Nuclear Reactor Regulation Related to Amendment No. 234 to Facility Operating License No. DPR-26, October 12, 2002.	T 4.1-1, No.9	3.1.7.1 SR

Discussion of Change	Summary of Change	CTS Section	ITS Section
ITS SPECIFICATION 3.1.8 - PHYSICS TEST EXCEPTIONS - MODE 2			
M.1	Restricts use of exemptions for physics testing from the requirements for moderator temperature coefficient, minimum temperature for criticality, and rod misalignment limits, unless RCS lowest loop average temperature is maintained greater than 541°F, shutdown margin (SDM) is maintained greater than limits specified in the COLR, and power is maintained less than 5% RTP. Adds requirements for periodic verification that these requirements are being met during physics testing and requirements for prompt restoration or termination of physics tests and proceeding to Mode 3 if these requirements are not being met.	3.1.C.1 3.1.C.2 3.10.5	3.1.8 RA-A.1 3.1.8 RA-A.2 3.1.8 RA-B.1 3.1.8 RA-C.1 3.1.8 RA-D.1 3.1.8.2 SR 3.1.8.3 SR 3.1.8.4 SR
M.2	Adds new requirements that RCS lowest loop average temperature must be maintained greater than or equal to 541°F, shutdown margin (SDM) must be maintained greater than limits specified in the COLR, and power must be maintained less than 5% RTP if rod alignment limits will not be met during physics testing.	3.10.5 3.10.7.2	3.1.8.a LCO 3.1.8.b LCO 3.1.8.c LCO 3.1.4
M.3	Adds requirement to perform a channel operational test (COT) of Reactor Protection System functions that use power range after any changes made to support physics testing and prior to start of the physics testing.	T 3.5-2, No.2a	3.1.8.1 SR

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS**ITS SECTION 3.2 - POWER DISTRIBUTION LIMITS**

Discussion of Change	Summary of Change	CTS Section	ITS Section
ITS SECTION 3.2.1 - HEAT FLUX HOT CHANNEL FACTOR ($F_Q(Z)$)			
M.1	Requires that the post refueling verification of thermal limit is completed "prior to exceeding 75% rated thermal power" following refueling.	3.10.2.2	3.2.1.1 SR
M.2	Establishes an explicit Completion Time of 15 minutes to reduce thermal power after a determination that $F_Q(Z)$ limits are not met.	3.10.2.2	3.2.1 RA-A.1
M.3	Adds a new requirement that the Overpower delta T trip setpoint is also reduced by the same percentage of RTP that the measured value of $F_Q(Z)$ exceeds its limit within 72 hours.	3.10.2.2	3.2.1 LCO 3.2.1 RA-A.1 3.2.1 RA-A.3
ITS SECTION 3.2.2 - NUCLEAR ENTHALPY RISE HOT CHANNEL FACTOR ($F_{\Delta H}^N$)			
M.1	Requires that the post refueling verification of thermal limit is completed "prior to exceeding 75% rated thermal power" following refueling.	3.10.2.2	3.2.2.1 SR
M.2	Requires that reactor power be reduced to < 50% RTP within 4 hours when FN delta H limits are not met. CTS requires that power be reduced only by the amount the FN delta H exceeds specified limits.	3.10.2.2.2	3.2.2 RA-A.1.1 3.2.2 RA-A.1.2.1
M.3	Requires that power range neutron flux trip setpoint is reduced to less than or equal to 55% RTP within 72 hours if FN delta H limits are not met. CTS requires that power be reduced only by the amount the FN delta H exceeds specified limits.	3.10.2.2.2	3.2.2 RA-A.1.2.2
M.4	Establishes explicit requirements for returning to full power following a determination that limits for FN delta H are not met.	3.10.2.2.2	3.2.2 RA-A.1 3.2.2 RA-A.2 3.2.2 RA-A.3

Discussion of Change	Summary of Change	CTS Section	ITS Section
M.5	Adds explicit requirement to re-verify within 24 hours that FN delta H requirements are met whenever FN delta H limits are not met even if FN delta H is restored to within limits before a power reduction is required.	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
ITS SECTION 3.2.3 - AXIAL FLUX DIFFERENCE (AFD)			
M.1	Limits allowance that AFD does not have to be maintained within the specified band during excore calibration procedures to a maximum of 16 hours during each SR interval (i.e., 92 days).	3.10.2.4	3.2.3 LCO 3.3.1.6 SR
M.2	Adds explicit requirement for periodic verification that AFD is within required limits when the AFD monitor alarm is functional.	3.10.2 3.10.3	3.2.3.1 SR
M.3	Adds requirement to reduce power to < 15% RTP if power is not reduced to < 50% RTP within 30 minutes of a determination that AFD limits are not being met when operation > 50% RTP.	3.10.2.7 3.10.2.7.2	3.2.3 APP 3.2.3 RA-C.1
ITS SPECIFICATION 3.2.4 - QUADRANT POWER TILT RATIO (QPTR)			
M.1	Requires re-verification of QPTR within 12 hours (versus 24 hours in the CTS) after the first determination that QPTR limits are exceeded. Adds a new requirement to re-verify QPTR every 12 hours thereafter until completion of an evaluation that demonstrates continued operation is acceptable.	3.10.3.1.a 3.10.3.1.b	3.2.4 RA-A.1 3.2.4 RA-A.2
M.2	Establishes a requirement for accelerated verification that ITS LCO 3.2.1 (FQ(Z)) and ITS LCO 3.2.2 (FN delta H) are being met whenever reactor power has been reduced because QPTR limits were no being met.	3.10.3	3.2.1 LCO 3.2.2 LCO 3.2.4 RA-A.3
M.3	Establishes an explicit requirement to verify QPTR, as indicated by the NIS excore channels, is within its limits every 7 days.	3.10.2.9 3.10.3	3.2.4.1 SR 3.2.4.2 SR

TABLE M - ADMINISTRATIVE CHANGES TO THE CTS**ITS SECTION 3.3 - INSTRUMENTATION**

Discussion of Change	Summary of Change	CTS Section	ITS Section
ITS SECTION 3.3.1- REACTOR PROTECTION SYSTEM (RPS) INSTRUMENTATION			
M.1	Incorporates explicit limits that are currently in the CTS Bases for the amount of time that an RPS train or channel (other than an RCP breaker position channel) can be bypassed for testing consistent with WCAP-14333-P-A, Rev. 1, "Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times". Limits the amount of time that a reactor breaker position channel may be bypassed to 4 hours based on WCAP-10271, Supplement 2, "Evaluation of Surveillance Frequencies and Out of Service Times for the Engineered Safety Features Actuation Systems."	3.5.3 3.5.4	3.3.1 RA-D.1 3.3.1 RA-E.1 3.3.1 RA-K.1 3.3.1 RA-L.1 3.3.1 RA-M.1
M.2	Adds a requirement for 2 channels of reactor manual trip function to be Operable and a requirement to restore a channel to Operable status within 48 hours if one of the two reactor manual trip functions becomes inoperable.	T 3.5-2, No.1 T 4.1-1, No.42	3.3.1 RA-B.1 3.3.1 RA-B.2 3.3.1 RA-C.1 3.3.1 RA-C.2.1 3.3.1 RA-C.2.2 T 3.3.1-1 No. 1
M.3	Expands the Applicability for Manual Reactor Trip Function to include Mode 3, 4 and 5 if the Rod Control System is capable of rod withdrawal or one or more rods are not fully inserted.	T 3.5-2	3.3.1 RA-C.2.1 3.3.1 RA-C.2.2 T 3.3.1-1 No. 1
M.4	Adds an explicit requirement for periodic calibration of the source, intermediate and power range nuclear detectors.	T 4.1-1, No.1 T 4.1-1, No.2 T 4.1-1, No.3	3.3.1.11 SR 3.3.1.12 SR
M.5	Adds an explicit requirement for immediate suspension of reactivity addition when all required IRM channels are inoperable and explicit requirement for immediately opening reactor trip breakers if both SRM channels are inoperable.	T 3.5-2, No.3 T 3.5-2, No.4	3.3.1 RA-G.1 3.3.1 RA-I.1

Discussion of Change	Summary of Change	CTS Section	ITS Section
M.6	Adds a requirement to perform a COT for ITS 3.3.1, Function 4, SRM Neutron Flux (trip), within 4 hours after reducing power below the P-6 (IRM Flux interlock) setpoint and to perform a COT for ITS 3.3.1, Function 4, within 4 hours after entering Mode 3 from Mode 2.	T 4.1-1, No.2	3.3.1.7 SR 3.3.1.8 SR
M.7	Not Used.	NA	NA
M.8	Adds a requirement for Operability and Surveillance testing of ITS 3.3.1, Function 14, SG Water Level Low Coincident with Steam Flow/Feedwater Flow Mismatch because this Function is assumed to provide a diverse and/or redundant reactor trip initiation in conjunction with SG Water Level Low (ITS 3.3.1, Function 13, Steam Generator (SG) Water Level low-low) in response to a loss of feedwater event.	3.5 4.1	T 3.3.1-1 No. 14
M.9	Adds an explicit requirement to verify Operability by actuation of the end device associated with the turbine trip function every 24 months.	T 4.1-1, No.27	3.3.1.14 SR
M.10	Adds an explicit requirement for Operability for the P-6, P-7, P-8, P-10 and Turbine First Stage Pressure (P-7 Input) interlocks which augments existing CTS requirements.	2.3.2.A 2.3.2.B	T 3.3.1-1 No. 17a T 3.3.1-1 No. 17b T 3.3.1-1 No. 17c T 3.3.1-1 No. 17d T 3.3.1-1 No. 17e 3.3.1 RA-P.1 3.3.1 RA-Q.1
M.11	Adds new requirements for reactor trip breakers and (RPS) automatic trip to be Operable in Mode 3, 4 and 5 if the Rod Control System is capable of rod withdrawal or if one or more rods are not fully inserted.	T 3.5-2, No.18 T 3.5-2, No.19	3.3.1 RA-C.1 3.3.1 RA-C.2 T 3.3.1-1 No. 18 T 3.3.1-1 No. 20
M.12	Adds a 4 hour limit for bypassing one RCP breaker position channel for test to be consistent with WCAP-14333-P-A, Rev. 1, Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times because the 12 hours bypass allowance of the WCAP does not apply to the Reactor Coolant Pump (RCP) Breaker Position RPS function.	3.5.3 3.5.4	3.3.1 RA-L.1
M.13	Adds requirements for (Reactor Trip) Safety Injection (SI) Input from ESFAS which was deleted as part of CTS Amendment 212, dated November 30, 2000.	3.5 4.1	T 3.3.1-1 No. 16

Discussion of Change	Summary of Change	CTS Section	ITS Section
M.14	Reduces the amount of time to reach Mode 3 (or exit the applicable Mode or plant condition) from 7 hours in CTS 3.0.1 to 6 hours in ITS 3.3.1 when the minimum level of redundancy not restored within the AOT because 6 hours is a reasonable time, based on operating experience, to place the unit in Mode 3 (or exit the applicable Mode or plant condition) from full power in an orderly manner and without challenging unit systems.	3.0.1 T 3.5-2	3.3.1
M.15	Establishes explicit statements to require Operability of ITS 3.3.1, Functions 10.a and 10.b, Reactor Coolant Pump (RCP) Breaker Position, which are not explicitly stated in the CTS but are implicit in the requirement for CTS Table 3.5-2, Item 13, 6.9 kV Bus Underfrequency, that relies on the RCP Breaker Position Function to operate.	2.3.2.B T 3.5-2, No.13	T 3.3.1-1 No. 10a T 3.3.1-1 No. 10b
M.16	Adds a specific requirement to perform a COT for the IRM within 12 hours after reducing power below the P-10 setpoint and adds a new requirement to perform a COT for the SRM within 4 hours after reducing power below the P-6 setpoint.	4.1.c T 4.1-1, No.2 T 4.1-1, No.3	3.3.1.7 SR 3.3.1.8 SR T 3.3.1-1 No. 4
M.17	Adds Operability requirements for the Source Range Trip function. Two channels are required to be Operable if the Rod Control System is capable of rod withdrawal or one or more rods are not fully withdrawn when in Modes 3, 4 and 5. If one of the two required SRM channels is not Operable, restoration within 48 hours is required. If both required channels are not Operable, ITS will require the reactor trip breakers be opened immediately.	3.5	T 3.3.1-1 No. 4
M.18	Adds new requirements that both installed channels of the Source Range (SRM) Flux trip are Operable (versus only one channel required by CTS) whenever the SRM is required to be Operable and that both installed channels of the Intermediate Range (IRM) Flux trip are Operable (versus only one channel required by CTS) whenever the IRM is required to be Operable.	T 3.5-2, No.3 T 3.5-2, No.4	T 3.3.1-1 No. 3 3.3.1 RA-F.1 3.3.1 RA-F.2 T 3.3.1-1 No. 4 3.3.1 RA-H.1
ITS SPECIFICATION 3.3.2 - ENGINEERED SAFETY FEATURE ACTUATION SYSTEM (ESFAS) INSTRUMENTATION			
M.1	Incorporates explicit limits that are currently in the CTS Bases for the amount of time that an ESFAS channel can be bypassed for testing.	3.5.3 3.5.4	3.3.2 RA-D.1 3.3.2 RA-E.1

Discussion of Change	Summary of Change	CTS Section	ITS Section
M.2	Requires that two channels (versus one channel in the CTS) of each ESFAS manual initiation function are Operable and requires that the inoperable channel is restored to Operable within 48 hours whenever one of the two required channels is inoperable.	T 3.5-3 T 3.5-4	T 3.3.2-1 No. 1a T 3.3.2-1 No. 2a T 3.3.2-1 No. 3a1 T 3.3.2-1 No. 3b1 T 3.3.2-1 No. 4a
M.3	Requires Operability of 2 channels of high steam flow per steam line on all 4 steam lines (versus the CTS requirement of 2 channels of high steam flow per steam line on only 3 of 4 steam lines) consistent with the assumptions of WCAP-10271 and WCAP-14333 which justified a 72 hour allowable out of service time for an inoperable channel and reducing the frequency of channel operational tests of these channels from monthly to quarterly.	T 3.5-3, No.1e T 3.5-4, No.2a	T 3.3.2-1 No. 1f T 3.3.2-1 No. 1g T 3.3.2-1 No. 4d T 3.3.2-1 No. 4e
M.4	Adds requirement for Operability and Surveillance testing of ITS 3.3.2, Function 7, ESFAS Interlock - Pressurizer Pressure, to ensure that ITS 3.3.2, Function 1.d, Safety Injection - Pressurizer Pressure - Low, is automatically unblocked when RCS pressure is increased above the pressure where ITS 3.3.2, Function 1.d, is required to actuate on decreasing RCS pressure.	T 3.5-3, No.1d T 3.5-3, No.1d* T 4.1-1, No.7	T 3.3.2-1 No. 7
M.5	Establishes requirements for ITS 3.3.2, Function 6.d. Auxiliary Feedwater-Station Blackout (SBO) (Undervoltage Bus 5A or 6A), by referencing LCO 3.3.5 except for Applicability. This is acceptable because requirements of the SBO function for the number of OPERABLE channels, the Required Actions when one or more channels are inoperable, Surveillance Testing of SBO channels, and the allowable values for LCO 3.3.2, Function 6.d, Auxiliary Feedwater SBO (Emergency Bus 5A or 6A) are the same as those required by LCO 3.3.5, "LOP DG Start Instrumentation."	T 3.5-3, No.4c	T 3.3.2-1 No. 6d
M.6	Increases frequency for channel check for containment pressure from shiftly (i.e., every 24 hours) to 12 hours.	T 4.1-1, No.18a	3.3.2.1 SR
M.7	Adds requirements for a channel check, channel operational test and channel calibration of the high steam flow input to the ESFAS safety injection and steam line isolation functions consistent with the assumptions in WCAP-10271-P-A, Supplement 2, Rev. 1, June 1990, and WCAP-14333-P-A, Rev.1, Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times.	T 3.5-3, No.1e T 3.5-4, No.2a T 4.1-1	3.3.2.1 SR 3.3.2.4 SR 3.3.2.7 SR

Discussion of Change	Summary of Change	CTS Section	ITS Section
M.8	Adds requirement for Operability and Surveillance testing of ITS 3.3.2, Function 5.b, Feedwater Isolation - SG Water Level (high-high). CTS does not explicitly require that this function is Operable.	3.5	T 3.3.2-1 No. 5b
M.9	Adds requirement that 1 channel of ITS 3.3.2, Function 6.e. Auxiliary Feedwater - Trip of Main Boiler Feedwater Pump, is Operable for each operating main boiler feedwater pump (versus 1 channel for either pump).	T 3.5-3	T 3.3.2-1 No. 6e 3.3.2 RA-H.2.1
M.10	Establishes Completion Times of 6 hours (versus 7 hours in CTS) for the plant to be to be in Mode 3 and 36 hours (versus 37 hours in CTS) for the plant to be in Mode 5 if requirements for minimum number of channels for an ESFAS Function are not met and Required Actions are not performed within the specified Completion Time.	T 3.5-3 footnote1 T 3.5-3 footnote2 T 3.5-4 footnote1	3.3.2
ITS SPECIFICATION 3.3.3 - POST ACCIDENT MONITORING (PAM) INSTRUMENTATION			
M.1	Adds requirement for one additional channel of the PAM instrument functions currently listed in Technical Specifications and specifies 30 days to restore an inoperable channel or justify continued operation based on the availability of alternate indication if a channel becomes inoperable.	T 3.5-5, No.7 T 3.5-5, No.10	3.3.3, Function 8 3.3.3, Function 9 3.3.3 RA-A.1 5.6.6
M.2	Eliminates the CTS allowance permitting a 48 hour delay before the plant is placed in a Mode where Post Accident Monitoring requirements are not Applicable when those requirements are not met.	T 3.5-5, Action 1	3.3.3 RA-E.1 3.3.3 RA-E.2
M.3	Eliminates the allowance permitting SG level instruments to be used as a substitute for AFW flow rate indefinitely and changes the presentation of requirements for Auxiliary Feedwater Flow Rate from 1 channel per steam generator to 4 channels.	T 3.5-5, No.6 T3.5-5, Note*****	3.3.3, Function 19
M.4	Reduces the time that both channels of Reg. Guide 1.97 Function Reactor Coolant System Subcooling Margin Monitor may be inoperable before a reactor shutdown is required from 37 days to 7 days.	T 3.5-5, No.2 T 3.5-5, Action 1 T 3.5-5, Action 2	3.3.3, Function 21

Discussion of Change	Summary of Change	CTS Section	ITS Section
M.5	ITS LCO 3.3.3 adds requirements for Operability, allowable out of service time and periodic Channel Checks and Calibration of the following instruments which were identified as either a Type A and/or Category I variable in the Indian Point 2 NRC Reg. Guide 1.97 Review of Accident Monitoring Instrumentation but which are not currently required by Technical Specifications.	3.5	3.3.3 RA-A.1 3.3.3.1 SR 3.3.3.3 SR
M.6	Not Used.	NA	NA
M.7	Adds requirement to place the plant in Mode 3 in 6 hour and Mode 4 in 12 hours if there is a loss of function of the Containment Pressure (high range) faction of the Post Accident Monitoring Instrumentation.	T 3.5-5, No. 7 T 3.5-5, Note 3	3.3.3, Function 8 3.3.3 RA-A.1 3.3.3 RA-E.1 3.3.3 RA-E.2
M.8	Increases the requirement for number of channels of RCS Subcooling Margin Monitor required by Technical Specifications from 1 Operable channel to 2 Operable channels.	T 3.5-5, No. 2 T 3.5-5, Action 2	3.3.3, Function 21 3.3.3 RA-A.1 3.3.3 RA-B.1
ITS SPECIFICATION 3.3.4 - REMOTE SHUTDOWN			
M.1	Adds requirements for instrumentation and controls necessary to place and maintain the unit in Mode 3 for an extended period of time from a location other than the control room.	None	3.3.4 T B3.3.4-1
M.2	Adds Required Actions if one or more of the remote shutdown functions becomes inoperable.	None	3.3.4 RA-A.1 3.3.4 RA-B.1 3.3.4 RA-B.2
M.3	Adds requirement that a Channel Check of remote shutdown functions be performed every 31 days of those channels which are normally energized.	None	3.3.4.1 SR
M.4	Adds requirement to verify every 24 months that each required remote shutdown control circuit and transfer switch performs the intended function.	None	3.3.4.2 SR T B3.3.4-1
M.5	Adds requirement that a Channel Calibration be performed every 24 months on each remote shutdown instrumentation channel (with the exception of the neutron detectors).	None	3.3.4.3 SR T B3.3.4-1

Discussion of Change	Summary of Change	CTS Section	ITS Section
M.6	Adds requirement for verification of proper operation of the local open/closed position indication on each reactor trip breaker and reactor trip bypass breaker every 24 months.	None	SR 3.3.4.4 T B3.3.4-1, No. 1b
ITS SPECIFICATION 3.3.5 - LOSS OF POWER (LOP) DIESEL GENERATOR (DG) START INSTRUMENTATION			
M.1	Expands the applicability for the loss of power (LOP) DG start instrumentation from whenever the plant is not in cold shutdown to whenever a DG is required to be Operable.	T 3.5-1, No.8a T 3.5-3, No.3a 3.5.1	3.3.5 APP
M.2	Not Used.	NA	NA
M.3	Adds explicit requirement for the Operability of two channels per bus of the 480 V Bus Degraded Voltage Function.	T 3.5-3, No.3.b	3.3.5 RA-F.1
M.4	Establishes requirements for 480 V Bus Station Blackout (SBO) Function - LOP DG Start Instrumentation to require the following: Three channels per bus of the Station Blackout (SBO) Function on buses 5A and 6A when in MODE 1, 2, 3 and 4; and Three channels per bus of the Station Blackout (SBO) Function on either bus 5A or 6A when in MODE 5 and 6.	T 3.5-3, No. 4.c	3.3.5
M.5	Added new Conditions and Required Actions for inoperable channels, loss of function and extended loss of redundancy of the ITS 3.3.5, 480 V Bus Station Blackout (SBO) Function - LOP DG Start Instrumentation that address new requirements for the Applicability of this Function and new requirements for the number of channels required to be Operable.	T 3.5-3	3.3.5
M.6	Establishes new requirement that both channels of the Undervoltage Function associated with each 480 V bus are required to be Operable to provide redundant instrumentation needed to ensure that each DG will start and load when required.	T 3.5-3, No. 3.a	3.3.5

Discussion of Change	Summary of Change	CTS Section	ITS Section
ITS SPECIFICATION 3.3.6 - CONTAINMENT PURGE SYSTEM AND PRESSURE RELIEF LINE ISOLATION INSTRUMENTATION			
M.1	<p>Adds a requirement for the Containment Radiation Monitor (R-42) and Particulate Containment Radiation Monitor (R-41) to be Operable in Modes 1, 2, 3 and 4 regardless of the status of the containment fan cooler condensate flow monitor.</p> <p>Adds a requirement that an inoperable channel be restored to Operable within 7 days when one of the two channels is inoperable.</p>	T 3.5-3, No. 4a 3.1.F	3.3.6 RA-A.1 3.3.6 RA-B.1
M.2	Establishes an allowable value for the Containment Purge System and Pressure Relief Line Isolation signal generated by Containment Radiation Monitor (R-42) and Particulate Containment Radiation Monitor (R-41).	T 3.5-4, No 4a	T 3.3.6-1
ITS SPECIFICATION 3.3.7 - CONTROL ROOM VENTILATION (CRVS)			
M.1	Reduces the allowable out of service time for loss of CRVS safety function, including actuation instrumentation, from 3.5 days to 72 hours.	3.3.H.1 3.3.H.2	3.3.7 LCO 3.3.7 RA-A.1 3.7.10
M.2	Eliminates an allowance permitting the reactor to remain in hot shutdown condition (Mode 3) for 48 hours prior to initiating plant cooldown (to Mode 5) when the control room ventilation system actuation instrumentation is not restored to an operable status within the time period specified.	3.3.H.2	3.3.7 RA-B.1 3.3.7 RA-B.2

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.4 - REACTOR COOLANT SYSTEM (RCS)

Discussion of Change	Summary of Change	CTS Section	ITS Section
ITS SPECIFICATION 3.4.1 - RCS PRESSURE, TEMPERATURE, AND FLOW DEPARTURE FROM NUCLEATE BOILING (DNB) LIMITS			
M.1	Expands Applicability for RCS pressure, temperature and flow limits from "pertain to four loop steady state operation at power levels greater than 98% of rated full power" to Mode 1 and requires that the plant be placed outside this expanded Applicability within 6 hours if limits are not met.	3.1.G	3.4.1 APP 3.4.1 RA-B.1
M.2	Adds clarification that verification every 24 months that RCS total flow is within specified limits is accomplished using a "precision heat balance."	3.1.G T 4.1-1, No.5	3.4.1.4 SR
ITS SPECIFICATION 3.4.2 - RCS MINIMUM TEMPERATURE FOR CRITICALITY			
M.1	Establishes more restrictive limit for minimum temperature for criticality consistent with accident analysis assumptions.	3.1.C.2	3.4.2 LCO
ITS SPECIFICATION 3.4.3 - RCS PRESSURE AND TEMPERATURE (P/T) LIMITS			
M.1	Establishes explicit requirements and completion times for restoration of pressure and temperature limits and for subsequent determinations that the RCS is acceptable for continued operation after any of these limits are violated.	3.1.B	3.4.3 RA-A.1 3.4.3 RA-A.2 3.4.3 RA-B.1 3.4.3 RA-B.2 3.4.3 RA-C.1 3.4.3 RA-C.2
M.2	Establishes explicit requirements and frequency for verification (i.e. every 30 minutes) that RCS heatup and cooldown is performed within the limits in Figure 3.4.3-1, "Heatup Limitations for the Reactor Coolant System (RCS) and Hydrostatic and Inservice Leak Testing Limitations for the RCS," and Figure 3.4.3-2, "Cooldown Limitations for the RCS (including RCS cooldown following RCS Inservice leak and hydrostatic testing)."	3.1.B.1	3.4.3.1 SR F 3.4.3-1 F 3.4.3-2 3.4.2 LCO

Discussion of Change	Summary of Change	CTS Section	ITS Section
ITS SPECIFICATION 3.4.4 - RCS LOOPS - MODES 1 AND 2			
M.1	Expands the LCO Applicability from "during power operation" to "Modes 1 and 2" to ensure 4 RCPs are in operation during all normal operations and whenever there is the potential for a transient or accident that assumes all RCPs are in operation.	3.1.A.1	3.4.4 APP
M.2	Adds an explicit statement that the plant be in Mode 3 in 6 hours if 4 RCPS are not in operation when required. This reduces the amount of time allowed to reach Mode 3 from 7 hours to 6 hours.	3.0.1 3.1.A.1	3.4.4 RA-A.1
M.3	Adds requirement for periodic verification that 4 RCPs are in operation during Modes 1 and 2.	3.1.A.1	3.4.4.1 SR
M.4	Deletes allowance that "one reactor coolant pump may be out of service for testing or repair purposes for a period not to exceed four hours" during power operation.	3.1.A.1.b	3.4.4
ITS SPECIFICATION 3.4.5 - RCS LOOPS MODE 3			
M.1	Adds requirement for periodic verification (every 12 hours) that the required minimum number of required RCS loops are in operation.	T 3.1.A-1	3.4.5.1 SR
M.2	Adds specific acceptance criteria for the periodic verification that SG water level is sufficient to support the SG decay heat removal function in Mode 3.	3.1.A.2 T 4.1-1, No.11	3.4.5.2 SR
M.3	Adds requirement for periodic verification (every 7 days) that breaker alignment is correct and power is available to any required RCP that is not in operation.	T 3.1.A-1(1)	3.4.5.3 SR
M.4	Limits the use of the allowance that all reactor coolant pumps used for redundant decay heat removal in Mode 3 may be secured for one hour to no more than once in any 8 hour period.	T 3.1.A-1(1)	3.4.5 LCO Note
M.5	Replaces CTS requirement to "immediately initiate action to bring RCS temperature to 350°F" when neither of the two required RCS loops are Operable and/or no RCS loop is in operation with ITS requirements to immediately "suspend all operations involving a reduction of RCS boron concentration" and "Initiate action to restore one RCS loop to OPERABLE status and operation."	T 3.1.A-1(1)	3.4.5 RA-D.1 3.4.5 RA-D.2 3.4.5 RA-D.3

Discussion of Change	Summary of Change	CTS Section	ITS Section
M.6	Deletes note to LCO Applicability stating requirements are applicable "excluding loss of offsite power."	T 3.1.A-1(1)	3.0.6 LCO 3.4.5 APP
ITS SPECIFICATION 3.4.6 - RCS LOOPS MODE 4			
M.1	Adds requirement for periodic verification (every 12 hours) that the required minimum number of RHR or RCS loops are in operation.	T 3.1.A-1(2)	3.4.6.1 SR
M.2	Requires SG Operability in Mode 4 for each RCS loop if the RCS loop is being credited as one of the redundant method for decay heat removal. Adds specific acceptance criteria and a requirement for the periodic verification that SG water level is sufficient to support the SG decay heat removal in Mode 4 if the associated RCS loop is being credited for decay heat removal.	3.1.A.2 T 3.1.A-1(2) T 4.1-1, No.11	3.4.6.2 SR
M.3	Adds requirement for periodic verification (every 7 days) that breaker alignment is correct and power is available to any required RCP or RHR pump that is not in operation.	T 3.1.A-1(2)	3.4.6.3 SR
M.4	Limits use of the allowance that all RCPs and/or RHR pumps to be de-energized for up to 1 hour in Mode 4 to once in any 8 hour period.	T 3.1.A-1(2)	3.4.6 LCO Note 1
ITS SPECIFICATION 3.4.7 - RCS LOOPS MODE 5, LOOPS FILLED			
M.1	Adds requirement for periodic verification (every 12 hours) that the required RHR loop is in operation.	T 3.1.A-1(3)	3.4.7.1 SR
M.2	Requires SG Operability in Mode 5 for each RCS loop if the RCS loop is being credited as one of the redundant methods for decay heat removal. Adds specific acceptance criteria and a requirement for the periodic verification that SG water level is sufficient to support the SG decay heat removal in Mode 5 if the associated RCS loop is being credited for decay heat removal.	3.1.A.2 T 3.1.A-1(3)	3.4.7 LCO 3.4.7 RA-A.2 3.4.7 RA-B.2 3.4.7.2 SR
M.3	Adds requirement for periodic verification (every 7 days) that breaker alignment is correct and power is available to any required RHR pump that is not in operation.	T 3.1.A-1(3)	3.4.7.3 SR

Discussion of Change	Summary of Change	CTS Section	ITS Section
M.4	Limits the use of the allowance that all RHR pumps used for redundant decay heat removal in Mode 5 may be secured for one hour to no more than once in any 8 hour period.	T 3.1.A-1(3)	3.4.7 LCO Note 1
M.5	Eliminates use of reactor coolant pumps (RCPs) as one or both of the required decay heat removal systems when in cold shutdown (i.e., Mode 5) because RCPs and the associated steam generators may not be able to maintain RCS temperature within cold shutdown limits.	T 3.1.A-1(3)	3.4.7 LCO
M.6	Eliminates the option for unlimited use of a temporary decay heat removal system in place of one or both of the redundant required RHR loops.	T 3.1.A-1(4)	3.4.7 LCO
ITS SPECIFICATION 3.4.8 - RCS LOOPS MODE 5, LOOPS NOT FILLED			
M.1	Differentiates between cold shutdown (i.e., Mode 5) with loops filled and cold shutdown with loops not filled when establishing requirements for redundant decay heat removal capability. Using 2 SGs and natural circulation as the backup decay heat removal system is not permitted in cold shutdown with loops not filled.	T 3.1.A-1(3)	3.4.8 LCO 3.4.7 LCO 3.4.6 LCO
M.2	Adds requirement for periodic verification (every 12 hours) that the required RHR loop is in operation.	T 3.1.A-1(3)	3.4.8.1 SR
M.3	Adds requirement for periodic verification (every 7 days) that breaker alignment is correct and power is available to any required RHR pump that is not in operation.	T 3.1.A-1(3)	3.4.8.2 SR
M.4	Reduces the time that all RHR pumps used for redundant decay heat removal may be secured when in Mode 5 with loops not filled from 1 hour to 15 minutes and limits the use of this allowance to situations when switching from one RHR pump to the other.	T 3.1.A-1(3)	3.4.8 LCO Note 1
M.5	Eliminates use of reactor coolant pumps (RCPs) as one or both of the required decay heat removal systems when in cold shutdown and RCS loops are not filled (i.e., Mode 5 with loops not filled) because RCPs cannot be operated when the loops are not filled and use of SG for decay heat removal will not be able to maintain RCS temperature within cold shutdown limits.	T 3.1.A-1(3)	3.4.8 LCO
M.6	Eliminates the option for unlimited use of a temporary decay heat removal system in place of one or both of the redundant required RHR loops.	T 3.1.A-1(4)	3.4.8 LCO

Discussion of Change	Summary of Change	CTS Section	ITS Section
M.7	Establishes new restriction that "No draining operations to further reduce the RCS water volume are permitted" when both RHR pumps are secured for pump switching when in Mode 5 with loops not filled.	T 3.1.A-1(3)	3.4.8 LCO Note 1
M.8	Establishes the explicit requirements to "Initiate action to restore RHR loop to Operable status" if one RHR loop inoperable and to "Suspend all operations involving reduction in RCS boron concentration and initiate action to restore one RHR loop to Operable status and operation" if a required RHR loop is inoperable or no RHR loop is in operation.	T 3.1.A-1(3)	3.4.8 RA-A.1 3.4.8 RA-B.1 3.4.8 RA-B.2
ITS SPECIFICATION 3.4.9 – PRESSURIZER			
M.1	Increases requirement for pressurizer heaters from one group to two groups and requires that each group is powered from a different safeguards power train to provide redundant heater capability so that natural circulation can always be maintained during hot shutdown with loss of offsite power and a single failure of a DG. Requires plant shutdown if redundant heater capability not restored within 72 hours and immediate plant shutdown when there is less than 150kW of Operable pressurizer heaters.	3.1.A.6 3.1.A.3.a	3.4.9.b LCO 3.4.9 RA-B.1 3.0.3
M.2	Clarifies the CTS 3.1.A.6.b requirement that the plant is placed in hot shutdown condition within 6 hours and "subsequently cooled to below 350°F" when requirements for pressurizer heaters are not met to a requirement to be in Mode 3 (i.e., hot shutdown) in 6 hours and Mode 4 (i.e., below 350°F) within 12 hours.	3.1.A.6.b	3.4.9 RA-C.1 3.4.9 RA-C.2
M.3	Establishes explicit requirement that the plant be in Mode 3 with all rods fully inserted and control rod system incapable of rod withdrawal within 6 hours and in Mode 4 within 12 hours if requirements for pressurizer level are not met.	3.1.C.4	3.4.9 RA-A.1 3.4.9 RA-A.2 3.4.9 RA-A.3 3.4.9 RA-A.4
M.4	Expands the Applicability requirements for pressurizer level from whenever the reactor is not "subcritical by at least 1%" (i.e., Mode 1 and Mode 2) to Modes 1, 2 and 3.	3.1.C.4	3.4.9 APP
M.5	Adds requirement for periodic verification that the pressurizer heaters are at their design rating so that natural circulation can always be maintained during hot shutdown with loss of offsite power and a single failure of a DG.	3.1.A.6	3.4.9.2 SR

Discussion of Change	Summary of Change	CTS Section	ITS Section
ITS SPECIFICATION 3.4.10 - PRESSURIZER SAFETY VALVES			
M.1	Expands the Applicability for the Operability of three pressurizer code safety valves from "whenever the reactor is critical" to Modes 1, 2, and 3, and portions of Mode 4 above the LTOP Applicability temperature. Mode 3 and portions of Mode 4 are conservatively included even though analyzed events may not require the safety valves for protection and one pressurizer safety valve is sufficient to accommodate all decay heat.	3.1.A.3.b	3.4.10 APP 3.4.12 LCO
M.2	Establishes restrictions (prohibiting critical operation and requiring a cold lift setting adjustment) going above LTOP Applicability temperature if surveillance for pressurizer code safety valve setpoints has not been completed.	3.1.A.3.b	3.4.10 APP Note
M.3	Requires that the plant must be in Mode 3 in 6 hours and Mode 4 with any RCS cold leg temperature less than or equal to the LTOP Applicability temperature within 12 hours if requirements for pressurizer safety valves are not met consistent with expanded Applicability.	3.1.A.3 3.0.1	3.4.10 APP 3.4.10 RA-A.1
ITS SPECIFICATION 3.4.11 - PRESSURIZER POWER OPERATED RELIEF VALVES (PORVs)			
M.1	Not Used.	NA	NA
M.2	Clarifies that CTS requirement for the reactor to be in hot shutdown (i.e., Mode 3) within the next 6 hours and "subsequently" cooled to below 350°F (i.e., Mode 4) requires the reactor be in Mode 3 in 6 hours and Mode 4 in 12 hours.	3.1.A.5.d	3.4.11 RA-D.1 3.4.11 RA-D.2 3.4.11 RA-G.1 3.4.11 RA-G.2
M.3	Adds new requirement that redundancy for PORV safety function (i.e., venting the pressurizer to mitigate a steam generator tube rupture event) is restored within 7 days. Adds requirement that reactor shutdown be initiated within 4 hours (versus 30 days) if there is a loss of the PORV safety function.	3.1.A.5 3.16.A 3.16.B 3.16.C	3.4.11 LCO
M.4	Not used.	NA	NA

Discussion of Change	Summary of Change	CTS Section	ITS Section
M.5	Requires periodic verification that each PORV and its associated block valve can be manually opened and closed to ensure that redundant pressurizer venting capability is available for mitigation of an SGTR and that a redundant isolation valve on each vent line is available to isolate the vent if a valve cannot be closed.	3.1.A.5	3.4.11.1 SR 3.4.11.2 SR
ITS SPECIFICATION 3.4.12 – Low Temperature Overpressure Protection (LTOP)			
M.1	Clarifies that LTOP requirements apply whenever "any" RCS cold leg temperature is less than the LTOP Applicability temperature of 280°F.	3.1.A.4.a T 3.1.A-1(2)	3.4.12 APP
M.2	Increases the Frequency for verification that block valves are open as required when the associated with PORVs in the overpressure protection mode from "twice weekly with a maximum time between checks of 5 days" to 72 hours (i.e., 3 days) with a maximum time between checks at 1.25 times that interval (i.e., 90 hours or 3.75 days).	4.18.A	3.4.12.5 SR 3.0.1
M.3	Adds a required Frequency of "Within 30 minutes prior to starting any RCP" for RCP starting prerequisites under LTOP conditions to clarify that these prerequisites must be verified within 30 minutes prior to pump start and must be met at the time of the pump start.	T 3.1.A-2	3.4.12.8 SR
M.4	Adds requirement that ECCS accumulators are isolated (with power to isolation valve removed) or depressurized when LTOP requirements must be met. Includes Required Actions and Completion Times if an accumulator is not depressurized and isolation valve not de-energized and requirement for periodic verification that accumulator isolation valve is closed and de-energized.	3.1.A.4	3.4.12 APP Note 3.4.12 LCO 3.4.12 RA-B.1 3.4.12 RA-C.1 3.4.12 RA-C.2 3.4.12.3 SR
M.5	Adds an explicit requirement to immediately initiate action to restore requirements for maximum number of HHSI pumps or charging pumps capable of injecting into the RCS and/or restore limits for the combination of pressurizer pressure, pressurizer level and RCS temperature when LTOP is required and requirements are not met.	T 3.1.A-2 3.1.A.4	3.4.12 RA-A.1 3.4.12 RA-A.2 3.4.12 RA-C.1 3.4.12 RA-C.2
ITS SECTION 3.4.13 - RCS OPERATIONAL LEAKAGE			
M.1	Superseded by Amendment 211.	NA	NA

Discussion of Change	Summary of Change	CTS Section	ITS Section
ITS SPECIFICATION 3.4.14 - RCS PRESSURE ISOLATION VALVE (PIV) LEAKAGE			
M.1	Adds clarification that PIV leakage acceptance criteria applies to normal operating pressure consistent with ASME requirements.	3.1.F.2.b	3.4.14.1 SR
M.2	Adds a new requirement to verify that RCS boundary valves 730 and 731 are closed and de-energized every 92 days when in Modes 1, 2 and 3 and in Mode 4 if not in the RHR mode of operation because IP2 does not have independent auto closure interlocks or open permissive interlocks on the RHR suction isolation valves (i.e., RCS boundary valves 730 and 731).	3.1.F.2.b.(2)	3.4.14.2 SR
M.3	Add 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.A.5	3.4.14.1 SR
ITS SPECIFICATION 3.4.15 - RCS LEAKAGE DETECTION INSTRUMENTATION			
M.1	Eliminates the option of performing a visual inspection of containment every shift if any or all of the required RCS leakage detection instruments are not Operable.	3.1.F.1.c	3.4.15 RA-E.1 3.4.15 RA-E.2 3.4.15 RA-F.1
M.2	Eliminates option that permits the containment fan cooler condensate flow monitor to be inoperable indefinitely with no compensatory action if both the containment atmosphere gaseous radiation monitor and the containment atmosphere particulate radiation monitor are Operable. Adds requirement for compensatory action whenever the containment fan cooler condensate flow monitor is not Operable.	3.1.F.1.a.(6)	3.4.15 LCO 3.4.15 RA-C.1 3.4.15 RA-C.2
ITS SPECIFICATION 3.4.16 - RCS SPECIFIC ACTIVITY			
M.1	Expands the Applicability for requirements for maximum reactor coolant activity from whenever the reactor is critical to include Mode 2 which includes conditions when Keff is greater than or equal to 0.99 (i.e., during a reactor startup).	3.1.D.1	3.4.16 APP
M.2	Increases Frequency for verification (every 7 days versus monthly) of the gross specific activity and eliminates the explicit requirement to verify gross activity (measurement of total activity in the reactor coolant) at least five days per week.	3.1.D.1 T 4.1-2, No.1	3.4.16.1 SR

Discussion of Change	Summary of Change	CTS Section	ITS Section
M.3	Adds a new limit for both a pre-accident iodine spike (RCS at 60 times the assumed maximum coolant equilibrium concentration limit of 1.0 Ci/gm of Dose Equivalent I-131) and an accident initiated iodine spike (RCS at the assumed maximum coolant equilibrium concentration limit of 1.0 Ci/gm of 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 .	3.1.D.1	3.4.16.2 SR 3.4.16 RA-A.1 3.4.16 RA-A.2 3.4.16 RA-C.1
M.4	Adds explicit requirement that the plant be in Mode 3 with average reactor coolant temperature less than 500°F within 6 hours whenever the limit for reactor coolant specific activity is not met.	3.1.D.1	3.4.16 RA-B.1

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS**ITS SECTION 3.5 - EMERGENCY CORE COOLING SYSTEM (ECCS)**

Discussion of Change	Summary of Change	CTS Section	ITS Section
ITS SPECIFICATION 3.5.1 - ACCUMULATORS			
M.1	Increases Applicability in the CTS from whenever the reactor is critical to the ITS Modes 1 and 2 and Mode 3 when RCS pressure is > 1000 psig. Eliminates ambiguity that requires plant in cold shutdown if inoperable accumulators not restored within specified out of service time. Eliminates exception permitting all accumulators to be inoperable during low temperature physic testing.	3.3.A.1	3.5.1 APP
M.2	Establishes new requirement for periodic verification (every 12 hours) of the existing requirement that each accumulator isolation valve is fully open.	3.3.A.1.c	3.5.1.1 SR
M.3	Not Used.	NA	NA
M.4	CTS requires verification of accumulator boron concentration every 31 days with an allowance to extend the interval to 45 days. ITS maintains the requirement to verify accumulator boron concentration every 31 days; however, ITS SR 3.0.2 limits any extension to the 31 day SR interval to 25% (approx. 39 days).	T 4.1-2, No.7	3.5.1.4 SR 3.0.2 SR
M.5	Establishes new requirement for periodic verification (every 31 days) that each accumulator isolation valve is fully open with motor operators de-energized.	3.3.A.1.i	3.5.1.5 SR
M.6	Expands Applicability for having accumulator isolation valve motor operators de-energized in open position from whenever the reactor is critical to Modes 1 and 2 and Mode 3 when RCS pressure is > 2000 psig.	3.3.A.1.i	3.5.1.5 SR
M.7	Adds requirement for upper limit for RWST boron concentration and periodic verification that this limit is met. CTS established only a lower limit for RWST boron concentration.	3.3 4.1	3.5.1.4 SR 3.5.1 RA-A.1

Discussion of Change	Summary of Change	CTS Section	ITS Section
ITS SPECIFICATION 3.5.2 - ECCS – OPERATING			
M.1	Expands applicability from whenever the reactor is critical to Modes 1, 2 and 3 (i.e., above 350°F). Eliminates ambiguity that requires plant in cold shutdown if inoperable ECCS component not restored within specified out of service time. Eliminates exception permitting all ECCS pumps to be inoperable during low temperature physic testing.	3.3.A.1	3.5.2 APP
M.2	Eliminates an allowance permitting the reactor to remain in hot shutdown condition (Mode 3) for 48 hours prior to initiating plant cooldown (to Mode 5) when ECCS LCO requirements are not met.	3.3.A.2	3.5.2 RA-B.2
M.3	Added SR for verification every 7 days that those valves in the ECCS flow path that would render more than one train of ECCS inoperable if mispositioned are in the correct position with power removed.	3.3.A.1.g 3.3.A.1.h 3.3.A.1.j	3.5.2.1 SR
M.4	Added SR for verification every 31 days that each ECCS manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position.	None	3.5.2.2 SR
M.5	Added SR for verification that each ECCS pump's developed head at the test flow point is greater than or equal to the required developed head in accordance with the Inservice Testing Program.	None	3.5.2.3 SR
M.6	Added SR to require verification every 24 months that containment sump and recirculation sump suction inlets are unrestricted and otherwise in proper operating condition.	None	3.5.2.7 SR
ITS SPECIFICATION 3.5.3 - ECCS - SHUTDOWN			
M.1	Establishes new requirement for two 50% capacity ECCS high head safety injection pumps and one 100% capacity ECCS RHR subsystem (low head) pumps to be OPERABLE to be Operable in Mode 4 to ensure ECCS flow is available to the core following a DBA in Mode 4.	3.3.A	3.5.3 LCO

Discussion of Change	Summary of Change	CTS Section	ITS Section
ITS SPECIFICATION 3.5.4 - REFUELING WATER STORAGE TANK (RWST)			
M.1	Expands applicability from whenever the reactor is critical to Modes 1, 2, 3 and 4 (i.e., above cold shutdown). Eliminates exception permitting RWST to be inoperable during low temperature physic testing.	3.3.A.1	3.5.4 APP
M.2	Adds requirement to maintain RWST temperature within the temperature range identified as initial conditions in the accident analysis. Includes new requirement for verification every 24 hours that RWST temperature is within limits and adds requirement to initiate plant shutdown and cooldown within 8 hours of determination RWST temperature requirement not met.	3.3	3.5.4 RA-A.1 3.5.4.1 SR
M.3	Adds requirement for upper limit for RWST boron concentration and periodic verification that this limit is met. CTS established only a lower limit for RWST boron concentration.	3.3.A.1.a	3.5.4.3 SR 3.5.4 RA-A.1
M.4	Eliminates an allowance permitting the reactor to remain in hot shutdown condition (Mode 3) for 48 hours prior to initiating plant cooldown (to Mode 5) when RWST LCO requirements are not met.	3.3.A.2	3.5.4 RA-D.2
M.5	Establishes allowances for extending SR Frequencies that are consistent with NUREG-1431 SR 3.0.2. This change is acceptable because it does not introduce any operation that is un-analyzed while requiring more timely verification that analysis assumptions regarding the Operability of the RWST is satisfied.	T 4.1-2, No 3	3.5.4.3 SR 3.0.2 SR

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS**ITS SECTION 3.6 - CONTAINMENT SYSTEMS**

Discussion of Change	Summary of Change	CTS Section	ITS Section
ITS SPECIFICATION 3.6.1 - CONTAINMENT			
M.1	Adds requirement that the reactor be in Mode 3 within 6 hours to the existing requirement to be in Mode 5 within 36 hours if requirements for containment integrity are not met within the allowable out of service time.	3.6.A.3	3.6.1 RA-B.1
ITS SPECIFICATION 3.6.2 - CONTAINMENT AIR LOCKS			
M.1	Requires that both air lock doors are kept closed when the air lock is not being used for normal entry into or exit from containment.	1.7.c 3.6.A.1.d	LCO 3.6.2
M.2	Not Used.	NA	NA
M.3	Adds requirement that the reactor be in Mode 3 within 6 hours to the existing requirement to be in Mode 5 within 36 hours if requirements for containment integrity are not met within the allowable out of service time.	3.6.A.3	3.6.2 RA-D.1
M.4	Adds requirement that if one air lock door is inoperable or the air lock door interlock is inoperable; then, the Operable door in the affected air lock must be locked shut within 24 hours and verified locked closed every 31 days thereafter unless the air lock door is in a high radiation area, in which case, administrative verification is acceptable.	3.6.A.3	3.6.2 RA-A.2 3.6.2 RA-A.3 3.6.2 RA-B.2 3.6.2 RA-B.3
M.5	Adds requirement for the Operability and periodic testing of the door interlock mechanism on containment airlocks.	1.7 3.6.A	SR 3.6.2.2
M.6	Adds requirements for compensatory actions for an airlock with an inoperable interlock mechanism equivalent to the compensatory actions for an inoperable airlock door.	1.7 3.6.A	3.6.2 RA-B.1 3.6.2 RA-B.2 3.6.2 RA-B.3

Discussion of Change	Summary of Change	CTS Section	ITS Section
ITS SPECIFICATION 3.6.3 - CONTAINMENT ISOLATION VALVES			
M.1	Adds requirement that the reactor be in Mode 3 within 6 hours to the existing requirement to be in Mode 5 within 36 hours if requirements for containment isolation valves are not met within the allowable out of service time.	3.6.A.3	3.6.3 RA-E.1
M.2	Not Used.	NA	NA
M.3	Adds requirement for periodic verification that penetration flow paths with one or more inoperable containment isolation valves are isolated. Specifies that isolation devices in high radiation areas and isolation devices that are locked, sealed or otherwise secured may be verified by use of administrative means.	3.6.A.3	3.6.3 RA-A.2 3.6.3 RA-C.2
M.4	Adds requirement that non-automatic containment isolation valves that are not normally open during plant operation may be opened only under administrative controls consisting of stationing at the valve controls a dedicated operator in continuous communication with the control room.	3.6.A.1.a T 3.6-1	3.6.3 ACTIONS- Note 1
M.5	Requires that restrictions on the opening angle and closure time for the containment purge supply and exhaust isolation valves and the pressure relief line isolation valves apply in Modes 1, 2, 3 and 4 and not only "during power operation."	3.6.A.1 3.6.A.2	SR 3.6.3.5 SR 3.6.3.7
M.6	Adds requirement for verification every 24 months that the containment purge supply and exhaust isolation valves and the pressure relief line isolation valves are set to limit valve disk travel to no greater than 60 degrees open.	3.6.A.2.a	SR 3.6.3.7
M.7	Adds requirement for periodic verification that the containment purge supply and exhaust isolation valves are closed and that the pressure relief line isolation valves are closed or, if open, open only for approved reasons.	3.6.A.2.b	SR 3.6.3.1 SR 3.6.3.2
M.8	Adds requirement for periodic verification that manual containment isolation valves and blind flanges are positioned or installed as required.	1.7.a 3.6.A 3.6.A.1.a 4.4	SR 3.6.3.3 SR 3.6.3.4

Discussion of Change	Summary of Change	CTS Section	ITS Section
M.9	Adds requirement for periodic verification that the isolation time of each automatic containment isolation valve is within limits.	3.6.3.2.a	SR 3.6.3.5
M.10	<p>Changes a CTS 3.0.1 requirement that the reactor must be in hot shutdown (i.e., Mode 3) within the next 7 hours and cold shutdown (i.e., Mode 5) within 37 hours unless the containment penetration is isolated in the interim to an ITS requirement to isolate the penetration within 1 hour or the reactor must be in Mode 3 within the next 6 hours (7 hours from discovery) and Mode 5 within 36 hours (37 hours from discovery) unless the containment penetration is isolated in the interim.</p> <p>Explains that ITS 3.6.3, Required Actions B.1, E.1 and E.2, require Actions identical to those required by CTS 3.0.1 for a Condition where CTS 3.6.A.3.a defaults to CTS 3.0.1.</p>	3.0.1 3.6.A.3.a	3.6.3 RA-B.1 3.6.3 RA-E.1 3.6.3 RA-E.2
ITS SPECIFICATION 3.6.4 - CONTAINMENT PRESSURE			
M.1	Expands applicability for limits on containment pressure from whenever the reactor is critical to Modes 1, 2, 3 and 4 (i.e., above cold shutdown).	3.6.B	3.6.4 APP 3.6.4 RA-B.1 3.6.4 RA-B.2
ITS SPECIFICATION 3.6.5 - CONTAINMENT AIR TEMPERATURE			
M.1	Adds a new requirement that containment average air temperature shall be less than or equal to 130°F when in Modes 1, 2, 3 and 4 consistent with assumptions used in the containment analysis in UFSAR 14.3.5.	3.6.C	LCO 3.6.5
M.2	Adds requirement for verification every 24 hours that containment average air temperature is less than or equal to 130°F and greater than 50°F when in Modes 1, 2, 3 and 4.	3.6.C	SR 3.6.5.1
ITS SPECIFICATION 3.6.6 - CONTAINMENT SPRAY SYSTEM AND CONTAINMENT FAN COOLER (CFU) SYSTEM			
M.1	Expands the Applicability for the containment spray system and the containment fan cooler system so that it is consistent with requirements for containment Operability. Eliminates ambiguity between CTS Applicability and CTS Actions by ensuring that the Actions are consistent with the ITS Applicability.	3.3.B.1 3.3.B.2 3.6.A.1	3.6.6 APP

Discussion of Change	Summary of Change	CTS Section	ITS Section
M.2	Requires that the reactor be in Mode 3 within 6 hours (versus shutdown using normal operating procedures) if the requirements for the containment spray system or the containment fan cooler system are not met within the specified completion time.	3.3.B.2	3.6.6 RA-B.1
M.3	Reduces the time allowed to reach cold shutdown (i.e., Mode 5) when requirements for the containment fan cooler Operability are not met from approximately 78 hours to 36 hours.	3.3.B.2	3.6.6 RA-E.2
M.4	Establishes a 10 day limit for the maximum consecutive time that the plant may be without the full complement of containment spray or fan cooler unit capability.	3.3.B.2	3.6.6 RA-A.1 3.6.6 RA-C.1
M.5	Adds requirement for verification every 31 days that each containment spray manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in position is in the correct position.	4.5.B	SR 3.6.6.1
M.6	Adds requirement for verification every 92 days that cooling water (i.e., service water) flow to each fan cooler unit is greater than or equal to the volume assumed in the accident analysis.	4.5.D	SR 3.6.6.3
M.7	Adds explicit requirement for verification that each containment spray pump's developed head is in accordance with requirements in the Inservice Testing Program.	4.5.B	SR 3.6.6.4
M.8	Eliminates statement containment spray testing is "performed with the isolation valves in the spray supply lines at the containment blocked closed" and requires that each automatic containment spray valve in the flow path that is not locked, sealed, or otherwise secured in position (i.e., valves that would not actuate on an actual signal), actuates to the correct position.	4.5.B.1	SR 3.6.6.5 SR 3.6.6.6
M.9	Adds a requirement to verify every 24 months that each containment fan cooler unit (FCU) starts automatically on an actual or simulated actuation signal.	4.5	SR 3.6.6.7
M.10	Clarifies with explicit Completion Times that the reactor be in Mode 3 within 6 hours (versus shutdown using normal operating procedures) and Mode 5 within 84 hours (versus cooldown using normal operating procedures) if the requirements for the containment spray system are not met within the specified completion time.	3.3.B.2	3.6.6 RA-B.1 3.6.6 RA-B.2

Discussion of Change	Summary of Change	CTS Section	ITS Section
M.11	Revised acceptance criteria for the verification containment spray nozzles from "spray nozzles shall be tested for proper functioning" which requires proper functioning of sufficient nozzles to meet the containment spray safety function to a requirement to "verify that each containment spray nozzle is unobstructed" which will require all containment spray nozzles are unobstructed.	4.5.B.2	SR 3.6.6.8
ITS SPECIFICATION 3.6.7 – RECIRCULATION PH CONTROL SYSTEM			
M.1	Expands the Applicability for the recirculation pH control system consistent with requirements for containment Operability. Eliminates ambiguity between CTS Applicability and CTS Actions by ensuring that the Actions are consistent with the ITS Applicability.	3.3.B.1 3.3.B.2 3.6.A.1	3.6.7 APP
M.2	Clarifies with explicit Completion Times that the reactor be in Mode 3 within 6 hours (versus shutdown using normal operating procedures) and Mode 5 within 84 hours (versus cooldown using normal operating procedures) if the requirements for the recirculation pH control system are not met within the specified completion time.	3.3.B.2	3.6.7 RA-B.1 3.6.7 RA-B.2
ITS SPECIFICATION 3.6.8 - HYDROGEN RECOMBINERS			
M.1	Expands the Applicability for hydrogen recombiners from whenever the reactor is critical to Modes 1 and 2.	3.3.G.1	3.6.8 APP
M.2	Requires that the reactor be in Mode 3 within 6 hours (versus shutdown using normal operating procedures) if the requirements for the hydrogen recombiners are not met within the specified completion time.	3.3.G.2	3.6.8 RA-C.1
ITS SPECIFICATION 3.6.9 - ISOLATION VALVE SEAL WATER (IVSW) SYSTEM			
M.1	Eliminates an allowance permitting the reactor to remain in hot shutdown condition (Mode 3) for 48 hours prior to initiating plant cooldown (to Mode 5) when the requirements for Isolation Valve Seal Water system are not met and associated Actions are not met within specified Completion Times.	3.3.C.3.a 3.3.C.3.b 3.3.C.3.c	3.6.9 RA-C.1 3.6.9 RA-C.2

Discussion of Change	Summary of Change	CTS Section	ITS Section
M.2	Adds requirement for verification every 24 hours that IVSW tank be maintained above the minimum required pressure of 52 psig and above the minimum required volume of 144 gallons of water.	3.3.C.1.b	SR 3.6.9.1 SR 3.6.9.3
M.3	Adds requirements for verification that IVSW nitrogen bank pressure is above a specified minimum required every 24 hours, valve actuation time is within required limits every 24 months, and that each automatic valve in the IVSW System actuates to the correct position on an actual or simulated actuation signal every 24 months.	3.3.C	SR 3.6.9.2 SR 3.6.9.4 SR 3.6.9.5
M.4	Requires that the reactor be in Mode 3 in 6 hours and Mode 5 in 36 hours if requirements for IVSW are not met and associated Actions not met within specified Completion Times.	3.3.C.3.a	1.3 3.6.9 RA-C.1
ITS SPECIFICATION 3.6.10 – WELD CHANNEL AND PENETRATION PRESSURIZATION SYSTEM (WC&PPS)			
M.1	Adds requirement for verification every 31 days that the four WC&PPS zones are pressurized above 47 psig.	3.3.D.1.a	SR 3.6.10.1
M.2	Adds requirement for verification every 31 days that uncorrected air consumption for the WC&PPS is less than or equal to 0.2% of the containment volume per day.	3.3.D.1.b	SR 3.6.10.2
M.3	Requires that depressurized portions of WC&PPS are isolated within 4 hours and requires periodic verification that isolation is maintained.	3.3.D.2.a	3.6.10 RA-A.1 3.6.10 RA-A.2
M.4	Adds Actions intended to ensure appropriate compensatory measures are promptly taken if WC&PPS pressurization is lost.	3.3.D.2.b	3.6.10 RA-B.1 3.6.10 RA-B.2 3.6.10 RA-B.3 NOTE
M.5	Eliminates an allowance permitting the reactor to remain in hot shutdown condition (Mode 3) for 48 hours prior to initiating plant cooldown to Mode 5 when the requirements for WC&PPS are not met and associated Actions are not met within specified Completion Times.	3.3.D.3.a 3.3.D.3.b 3.3.D.3.c	3.6.10 RA-C.1 3.6.10 RA-C.2

Discussion of Change	Summary of Change	CTS Section	ITS Section
M.6	Requires that the reactor be in Mode 3 in 6 hours and Mode 5 in 36 hours if requirements for WC&PPS are not met and associated Actions not met within specified Completion Times.	3.3.D.3	1.3 3.6.10 RA-C.1 3.6.10 RA-C.2

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS**ITS SECTION 3.7 - PLANT SYSTEMS**

Discussion of Change	Summary of Change	CTS Section	ITS Section
ITS SPECIFICATION 3.7.1 - MAIN STEAM SAFETY VALVES (MSSVs)			
M.1	Adds MSSV SR acceptance criteria for lift setpoints; staggering of lift setpoints; setpoint tolerance of (plus or minus) 3% as a condition of Operability; and, setpoint adjustment tolerances of (plus or minus) 1%.	3.4.A	3.7.1 LCO T 3.7.1-2
M.2	Limits allowance that MSSVs are not required during testing to restriction that MSSV testing must be completed prior to entering Mode 2.	3.4.A	3.7.1.1 SR
M.3	Adds new requirement for a reduction in reactor power to the heat removal capacity of the remaining Operable MSSVs within 4 hours.	3.4.A.1 3.4.B	3.7.1 RA-A.1 3.7.1 RA-B.1 3.7.1 RA-B.2
M.4	Reduces the Completion Time for the Power Range Neutron Flux Trip Setpoint reduction from 72 hours to 36 hours when more than one MSSVs in one or more SGs is inoperable.	3.4.A.1 3.4.B	3.7.1 RA-B.2
M.5	Reduces the Completion Time to place plant in a condition where MSSVs are not required when requirements are not met to be in Mode 2 in 6 hours and Mode 4 in 12 hours.	3.4.B	3.7.1 RA-C.1 3.7.1 RA-C.2
M.6	Superceded by CTS Amendment 228.	NA	NA
ITS SPECIFICATION 3.7.2 - MAIN STEAM ISOLATION VALVES (MSIVs) AND MAIN STEAM CHECK VALVES (MSCVs)			
M.1	Allows only one MSIV (versus all 4 MSIVs) to be inoperable for up to 72 hours prior to requiring initiation of a plant shutdown.	3.4.B	3.7.2 RA-C.1
M.2	Requires MSIV testing to be completed before entering Mode 2.	4.7	3.7.2.1 SR 3.7.2.2 SR 3.0.4 SR

Discussion of Change	Summary of Change	CTS Section	ITS Section
M.3	Establishes Technical Specification requirement to perform a visual inspection of the MSCVs in accordance with the requirements of and at the Frequency specified by the IST Program.	3.4 4.7	3.7.2.3 SR
M.4	Reduces the Completion Time to place plant in a condition where MSIVs are not required when requirements are not met to be in Mode 3 in 6 hours and Mode 4 in 12 hours.	3.4.B	3.7.2 RA-D.1 3.7.2 RA-G.1 3.7.2 RA-G.2
ITS SPECIFICATION 3.7.3 – MAIN FEEDWATER ISOLATION			
M.1	<p>Adds requirements for Operability, allowable out of service times and testing of redundant main feedwater isolation capability consisting of the following:</p> <p>Four Main Feedwater Regulating Valves (MFRVs) and four Low Flow Main Feedwater Bypass Valves (Lo Flow MFBVs); and</p> <p>Two Main Boiler Feedwater Pump (MBFP) discharge valves, and the trip function for each MBFP.</p>	3.5.1 T 3.5-4, No.3a	3.7.3.1 SR 3.7.3.2 SR 3.7.3.3 SR
ITS SPECIFICATION 3.7.4 - ATMOSPHERIC DUMP VALVES (ADV's)			
M.1	Adds requirement for Operability of the 4 ADV lines in Modes 1, 2, and 3, and in Mode 4, when a steam generator is being relied upon for heat removal.	3.4	3.7.4 LCO
ITS SPECIFICATION 3.7.5 - AUXILIARY FEEDWATER (AFW) SYSTEM			
M.1	Expands Applicability for AFW to specify that one of the motor driven AFW pumps must be Operable in Mode 4 when a steam generator is relied upon for heat removal. Additionally, the Note to LCO 3.7.5 specifies that the motor driven AFW pump required to be Operable in Mode 4 must be capable of supporting the SG being credited as the redundant decay heat removal path.	3.4.A.2	3.7.5 LCO 3.7.5 RA-E.1
M.2	Adds new requirement that an inoperable AFW pump must be restored within 10 days from discovery of failure to meet the LCO if that is more restrictive than the allowable out of service time for the AFW pump.	3.4.B.1.a	3.7.5 RA-A.1 3.7.5 RA-B.1

Discussion of Change	Summary of Change	CTS Section	ITS Section
M.3	Adds an explicit limit that the shutdown to Mode 3 must be completed in 6 hours if an inoperable AFW pump cannot be restored within 72 hours or two AFW pumps are inoperable.	3.4.B.1.a 3.4.B.1.b	3.7.5 RA-C.1 3.7.5 RA-C.2
M.4	Adds requirement for monthly verification of the correct alignment for manual, power operated, and automatic valves in the AFW System water and steam supply flow paths in order to provide assurance that the proper flow paths will exist for AFW operation.	4.8	3.7.5.1 SR
M.5	Increases required Frequency for testing each auxiliary feedwater pump from once every 24 months to the Frequency required by the IP2 Inservice Testing Program Schedule which is currently quarterly.	4.8.A.2	3.7.5.2 SR
ITS SPECIFICATION 3.7.6 - CONDENSATE STORAGE TANK (CST)			
M.1	Expands Applicability for CST Operability to include Mode 4 when a steam generator is relied upon for heat removal.	3.4.A 3.4.B	3.7.6 APP 3.7.6 RA-B.2
M.2	Adds requirement that prohibits concurrent inoperability of the CST and city water.	3.4.A.3 3.4.B 3.4.C	3.7.6 RA-A.1
M.3	Adds requirement for periodic verification that CST contains greater than 360,000 gallons of condensate.	3.4.A.3	3.7.6.1 SR
M.4	Reduces the Completion Time to place plant in a condition where CST is not required when requirements are not met to be in Mode 2 in 6 hours and Mode 4 without reliance on SG for heat removal within 18 hours.	3.4.B	3.7.6 RA-B.1 3.7.6 RA-B.2
ITS SPECIFICATION 3.7.7 – COMPONENT COOLING WATER (CCW) SYSTEM			
M.1	Expands applicability for CCW from whenever the reactor is critical to Modes 1, 2, 3 and 4 (i.e., above cold shutdown).	3.3.E.1 3.3.E.2	3.7.7 APP
M.2	Applies the most restrictive of the CTS Completion Times for plant shutdown to Mode 5 when there is a loss of required redundancy but not a loss of CCW function.	3.3.E.2	3.7.7 RA-B.1 3.7.7 RA-B.2

Discussion of Change	Summary of Change	CTS Section	ITS Section
M.3	Adds requirements for periodic verification of the key aspects to CCW Operability: ITS SR 3.7.7.1 is a requirement for valve lineups every 92 days; SR 3.7.7.2 is a requirement to verify proper automatic operation of the CCW valves every 24 months; and, SR 3.7.7.3 is a requirement to verify automatic operation of the CCW pumps every 24 months.	3.3.E	3.7.7.1 SR 3.7.7.2 SR 3.7.7.3 SR
ITS SPECIFICATION 3.7.8 - SERVICE WATER (SW) SYSTEM			
M.1	Expands the applicability for essential and non essential service water to include Mode 4 to support required Operability of the emergency diesel generators, containment cooling fan cooler units and component cooling water which ITS requires to be Operable in Mode 4.	3.3.F.1.a 3.3.F.1.b 3.3.F.2.a 3.3.F.2.b	3.7.8 APP 3.7.8 RA-E.2
M.2	Prevents use of the allowance used to swap the essential and non-essential SWS headers if LCO 3.7.8 will not be met after the essential and non-essential header are swapped.	3.3.F.3	3.7.8 RA-Note
M.3	Adds requirement for verification of the correct alignment for manual, power operated, and automatic valves in the SWS System flow paths every 92 days	3.3.F	3.7.8.1 SR
M.4	Adds explicit requirement for verification every 24 months that each SWS automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal.	3.3.F	3.7.8.2 SR
M.5	Adds requirement to verify every 24 months that each SWS pump starts automatically on an actual or simulated actuation signal.	3.3.F	3.7.8.3 SR
M.6	Clarifies that the 12 hour allowable out of service time in CTS 3.3.F.1.b applies if there is a loss of redundancy (but not a loss of minimum required function) for automatic initiation of SW to all FCUs or all DGs.	3.3.F.1 3.3.F.2	3.7.8 RA-C.1 3.7.8 RA-D.1 3.7.8 RA-E.1 3.7.8 RA-E.2

Discussion of Change	Summary of Change	CTS Section	ITS Section
ITS SPECIFICATION 3.7.9 – ULTIMATE HEAT SINK (UHS)			
M.1	Expands the applicability for limits on service water inlet temperature (i.e., ultimate heat sink) to include Mode 4 to support required Operability of the emergency diesel generators, containment cooling fan cooler units and component cooling water which ITS also requires to be Operable in Mode 4.	3.3.F.4.b	3.7.9 APP 3.7.9 RA-B.1 3.7.9 RA-B.2
M.2	Adds a new requirement to verify that the UHS temperature is within required limits every 24 hours whenever the plant is in the applicable modes.	3.3.F.5	3.7.9.1 SR
ITS SPECIFICATION 3.7.10 - CONTROL ROOM VENTILATION SYSTEM (CRVS)			
M.1	Establishes requirement that two CRVS trains are Operable to provide redundant CRVS capability and ITS LCO 3.7.10, Condition A and Required Action A.1, establish a new AOT of 7 days when one of the two redundant CRVS trains is not Operable.	3.3.H.1 3.3.H.2 4.5.E.4.c	3.7.10 RA-A.1 3.7.10 RA-B.1 3.7.10.4 SR
M.2	Reduces the allowable out of service time for loss of CRVS safety function from 3.5 days to 72 hours.	3.3.H.1 3.3.H.2	3.7.10 RA-A.1
M.3	Eliminates an allowance permitting the reactor to remain in hot shutdown condition (Mode 3) for 48 hours prior to initiating plant cooldown (to Mode 5) when the control room ventilation system is not restored to an operable status within the time period specified.	3.3.H.2	3.7.10 RA-C.1 3.7.10 RA-C.2
M.4	Not Used.	NA	NA
M.5	Adds requirement that Control Room Ventilation System (CRVS) is Operable "During movement of recently irradiated fuel assemblies" outside containment (i.e., the fuel storage building) if the fuel involved has occupied part of a critical reactor core within the previous 100 hours.	3.3.H.1	3.7.10 LCO
M.6	Adds Required Actions to immediately place the CRVS in the pressurization mode or immediately suspend movement of recently irradiated fuel if one CRVS train is inoperable during movement of recently irradiated fuel assemblies or immediately suspend movement of recently irradiated fuel if both CRVS trains are inoperable during movement of recently irradiated fuel assemblies.	3.3.H.1	3.7.10 RA-D.1 3.7.10 RA-D.2 3.7.10 RA-E.1

Discussion of Change	Summary of Change	CTS Section	ITS Section
ITS SPECIFICATION 3.7.11 – SPENT FUEL PIT WATER LEVEL			
M.1	Adds requirement for verification every 7 days that the spent fuel pit water level is greater than or equal to 23 ft above the top of the irradiated fuel assemblies seated in the storage racks whenever irradiated fuel in the spent fuel pit is being moved.	3.8.C.2	3.7.11.1 SR
ITS SPECIFICATION 3.7.12 - SPENT FUEL PIT BORON CONCENTRATION			
M.1	CTS requires verification of spent fuel pit boron concentration every 7 days with an allowance to extend the interval to 10 days. ITS maintains the requirement to verify spent fuel pit boron concentration every 7 days; however, ITS SR 3.0.2 limits any extension to the 7 day SR interval to 25% (i.e., 8.25 days).	T 4.1-2, No.8	3.0.2 SR 3.7.12.1 SR
ITS SPECIFICATION 3.7.13 - SPENT FUEL PIT STORAGE			
	NONE		
ITS SPECIFICATION 3.7.14 - SECONDARY SPECIFIC ACTIVITY			
M.1	Expands the applicability for limits on secondary system specific activity to include Mode 4 because SG venting to the atmosphere may be needed to remove decay heat in Mode 4.	3.4.A 3.4.A.6	3.7.14 APP 3.7.14 RA-A.1 3.7.14 RA-A.2
M.2	Changes limits for steam generator secondary side activity level from “total iodine activity of I-131 and I-133” to Dose Equivalent I-131 which is defined in NUREG-1431 as “that concentration of I-131 (micro curies/gram) that alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134, and I-135 actually present.”	3.4.A.6	3.7.14
M.3	Eliminates 72 hour allowance to restore secondary specific activity within required limits and requires that plant shutdown to Mode 3 is completed within 6 hours (versus 12 hours allowed in the CTS) when limits for secondary specific activity are not met.	3.4.B	3.7.14 LCO 3.7.14 RA-A.1 3.7.14 RA-A.2

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.8 - ELECTRICAL POWER SYSTEMS

Discussion of Change	Summary of Change	CTS Section	ITS Section
ITS SPECIFICATION 3.8.1 - AC SOURCES - OPERATING			
M.1	Expands Applicability for Onsite and Offsite AC sources from whenever the reactor is critical to Modes 1, 2, 3 and 4. Requires that the reactor is placed in Mode 5 if requirements for Onsite and Offsite AC sources are not met.	3.7.A	3.8.1 RA-F.1 3.8.1 RA-F.2 3.8.1 RA-G.1 3.8.1 RA-H.1
M.2	Adds Note requiring that Conditions and Required Actions for LCO 3.8.9, "Distribution Systems - Operating," must be immediately entered whenever no "offsite or DG" AC power source is automatically available to any train.	3.7.A.4	3.8.1 RA-D.1 3.8.1 RA-D.2
M.3	Adds requirement for periodic verification of correct breaker alignment and indicated power availability for offsite circuits. Adds requirement to increase the Frequency of the verification of correct breaker alignment and indicated power availability for offsite circuits whenever the number of AC onsite sources or the number of offsite AC sources is one less than required.	3.7 4.6	3.8.1 RA-A.1 3.8.1 RA-B.1 3.8.1.1 SR
M.4	Adds requirement that required features with no offsite power automatically available must be declared inoperable within 24 hours when its redundant required feature is inoperable.	3.7.B.3	3.8.1 RA-A.3
M.5	Not Used.	NA	NA
M.6	Adds acceptance criteria to DG start test (i.e., DG starts from standby conditions and achieves, in less than or equal to 10 seconds, voltage greater than or equal to 426 V and less than or equal to 500 V, and frequency greater than or equal to 58.8 Hz and less than or equal to 61.2 Hz.	4.6.A.1	3.8.1.2 SR 3.8.1.3 SR
M.7	Adds acceptance criteria to DG load test (i.e., DG start test is immediately followed by one hour of operation at 90% to 100% of the continuous rating).	4.6.A.1	3.8.1.2 SR 3.8.1.3 SR

Discussion of Change	Summary of Change	CTS Section	ITS Section
M.8	Adds requirement for verification that DG fuel inventory in the day tanks is greater than or equal to 115 gallons at a Frequency of once per 24 hours.	4.6	3.8.1.4 SR
M.9	Adds requirement to check for and remove accumulated water from each day tank once every 31 days.	4.6	3.8.1.5 SR
M.10	Adds new requirement to verify every 92 days that the fuel oil transfer system operates to automatically transfer fuel oil from the storage tank to each DG day tank.	4.6	3.8.1.6 SR
M.11	Adds new requirement to verify every 24 months that offsite power can be manually transferred from the 138 kV offsite (normal) source to the 13.8 kV offsite (alternate) source to demonstrate the Operability of the 13.8 kV offsite source to power the shutdown loads as is assumed in the UFSAR.	4.6	3.8.1.7 SR
M.12	Adds explicit requirement that 6.9 kV buses 2 and 3 will auto transfer to 6.9 kV buses 5 and 6 following a loss of voltage on 6.9 kV buses 2 and 3 and adds new requirement to test this feature every 24 months.	3.7 4.6	3.8.1 LCO Note 3.8.1.8 SR
M.13	Adds new requirement to verify every 24 months that a loss of voltage signal on the emergency bus concurrent with an ESF actuation signal causes each DG's automatic trips to be bypassed except for those trips identified in the UFSAR as not being bypassed. The trips not bypassed are engine overspeed, low lube oil pressure, and the start failure relay (i.e., engine over crank).	4.6	3.8.1.9 SR
M.14	Adds more restrictive acceptance criteria to the DG endurance test run including that: this endurance run continue for at least 8 hours; the run is conducted with the DG loaded between 105% and 110% of the continuous rating for greater than or equal 2 hours and between 90% and 100% of the continuous rating for the remaining hours of the test; and test must be conducted with a power factor less than or equal to 0.85 lagging.	4.6.A.2	3.8.1.10 SR
M.15	Adds new requirement to verify every 24 months that individual load timers function to auto-connected emergency loads are re-connected to the emergency bus within the time interval assumed in the safety analysis.	3.7 4.6.A.3	3.8.1.11 SR

Discussion of Change	Summary of Change	CTS Section	ITS Section
M.16	Adds more comprehensive acceptance criteria for the test of the DGs comparability to response to a loss of offsite power concurrent with a loss of coolant accident. Specifically, ITS SR 3.8.1.12 requires that each DG starts from standby conditions and achieves, in less than or equal to 10 seconds, voltage greater than or equal to 428 V and less than or equal to 500 V, and frequency greater than or equal to 58.8 Hz and less than or equal to 61.2 Hz.	4.6.A.3	3.8.1.12 SR
ITS SPECIFICATION 3.8.2 - AC SOURCES – SHUTDOWN			
M.1	Adds requirements for minimum requirements for AC sources when the reactor is in Mode 5 or 6 or during the movement of recently irradiated fuel assemblies. Added Required Actions if these requirements for minimum AC Sources are not met and periodic testing necessary to demonstrate that the AC sources are capable of responding as required.	3.7	3.8.2 LCO
ITS SPECIFICATION 3.8.3 - DIESEL FUEL OIL AND STARTING AIR			
M.1	Establishes requirement that properties of diesel fuel oil in the DG fuel oil storage tanks and the DG fuel oil reserve are verified to the acceptance criteria and at the frequency specified in ITS 5.5.11, "Diesel Fuel Oil Testing Program."	3.7 4.6	3.8.3.3 SR 3.8.3.4 SR 5.5.11
M.2	Increases Frequency for verification of the DG fuel inventory in the DG offsite reserve from weekly to every 24 hours with the maximum time between verifications governed by ITS SR 3.0.2.	T 4.1-3, No.7	3.8.3.1 SR
M.3	Establishes requirement for periodic verification that each DG air receiver is at the minimum pressure required to support at least four start attempts consistent with the requirements in the UFSAR Section 8.2.	3.7 4.6	3.8.3 LCO 3.8.3.5 SR
M.4	Establishes requirement for periodic checking for and removing accumulated water from each DG fuel oil storage tank.	3.7 4.6	3.8.3.6 SR
ITS SPECIFICATION 3.8.4 - DC SOURCES – OPERATING			
M.1	Expands Applicability for DC sources (i.e., batteries and battery chargers) from whenever the reactor is critical to Modes 1, 2, 3 and 4. Requires that the reactor is placed in Mode 5 if requirements for batteries and/or chargers are not met.	3.7.A	3.8.4 RA-C.1 3.8.4 RA-C.2

Discussion of Change	Summary of Change	CTS Section	ITS Section
M.2	Adds surveillance that verifies that the alternate source of DC control power will be connected immediately if the required battery and/or charger does not maintain the associated DC power panel above the required minimum voltage needed to support DC control power. Operability of this feature is needed only to justify a 24 hour Completion Time for restoration of an inoperable battery and/or charger.	4.6	3.8.4.4 SR
M.3	Supplements requirement for periodic verification of battery voltage with requirement that battery voltage meet acceptance criteria in accordance with the program established by Technical Specification 5.5.15, "Battery Monitoring and Maintenance Program."	4.6.C.1	3.8.4.1 SR 5.5.15
M.4	Adds requirement for periodic verification every 24 months that: each battery each battery charger supplies greater than or equal to 250 amps at greater than or equal to the minimum established float voltage for greater than 2 hours; or, each battery charger can recharge the battery to the fully charged state within 15 hours while supplying the normal steady state loads, after a battery discharge to the bounding design basis event discharge state.	3.7 4.6	3.8.4.2 SR
M.5	Increases the Frequency for battery voltage verification from monthly to every 7 days consistent with the recommendations in IEEE-450-1995.	4.6.C.1	3.8.4.1 SR
M.6	Explicit statement that the battery load test may not be performed in Modes 1 and 2 although portions of the Surveillance may be performed to reestablish Operability provided an assessment determines the safety of the plant is maintained or enhanced.	4.6.C.4	3.8.4.3 SR 3.8.4.6 SR
ITS SPECIFICATION 3.8.5 - DC SOURCES - SHUTDOWN			
M.1	Adds requirements for Operability and Surveillance testing of any DC electrical power subsystem (i.e., battery and charger) needed to support the DC electrical power distribution subsystems required by LCO 3.8.10, "Distribution Systems—Shutdown" when in Mode 5 or 6 or during the movement of recently irradiated fuel assemblies.	3.7 4.6	3.8.5 LCO 3.8.5.1 SR 3.8.10

Discussion of Change	Summary of Change	CTS Section	ITS Section
ITS SPECIFICATION 3.8.6 - BATTERY PARAMETERS			
M.1	Expands Applicability for station battery Operability from whenever the reactor is critical to whenever associated DC electrical power subsystems are required to be Operable in ITS LCO 3.8.4 and ITS LCO 3.8.5.	3.7.A 3.7.A.6	3.8.4 3.8.5 3.8.6 3.8.10
M.2	Adds acceptance criteria for use with the requirement for verification that each battery pilot cell temperature and battery cell voltage is measured and recorded.	4.6.C.1	3.8.6.2 SR 3.8.6.4 SR
M.3	Adds requirement for monthly verification that each battery cell level is within design limits.	4.6.C.1	3.8.6.3 SR
M.4	Adds requirements to verify every 60 months that the battery capacity is greater than or equal to 80% of the manufacturer's rating when subjected to a performance discharge test or a modified performance discharge test every 60 months. SR 3.8.6.6 requires that the Frequency for this test is accelerated to 12 months when battery shows degradation or has reached 85% of expected life with capacity less than 100% of manufacturer's rating and accelerated to 24 months when battery has reached 85% of the expected life with capacity less than or equal to 100% of manufacturer's rating.	4.6.C.4	3.8.6.6 SR
M.5	Adds requirement to verify every 7 days that the battery is fully charged by verifying battery float current while on float charge is within specified limits.	3.7.A 4.6.C	3.8.6.1 SR
ITS SPECIFICATION 3.8.7 - INVERTERS – OPERATING			
M.1	Establishes explicit requirements for Operability of the inverters supplying each of the four 118 V AC instrument buses in Modes 1, 2, 3 and 4. Establishes new requirements for periodic verification that the inverters are functioning properly (i.e., voltage and frequency with acceptable limits) with all required circuit breakers closed and AC buses energized from the inverter. Establishes a limit that allows only one inverter to be inoperable at one time and limits the time that this inverter may be inoperable to 24 hours.	3.7	LCO 3.8.7 3.8.7 RA-A.1 3.8.7 RA-B.1 3.8.7 RA-B.2 3.8.7.1 SR

Discussion of Change	Summary of Change	CTS Section	ITS Section
ITS SPECIFICATION 3.8.8 - INVERTERS – SHUTDOWN			
M.1	Adds explicit requirements for Operability of the inverters supplying 118 V AC instrument buses required by LCO 3.8.10, "Distribution Systems - Shutdown" when in Mode 5 or 6 or during the movement of recently irradiated fuel assemblies. Establishes new requirements for periodic verification that the inverters are functioning properly (i.e., voltage and frequency with acceptable limits) with all required circuit breakers closed and AC buses energized from the inverter	3.7	LCO 3.8.8 3.8.8 RA-A.1 3.8.8 RA-A.2 3.8.8.1 SR
ITS SPECIFICATION 3.8.9 - DISTRIBUTION SYSTEMS - OPERATING			
M.1	Expands Applicability for AC, DC, and 118 Vac instrument bus electrical power distribution subsystems from whenever the reactor is critical to Modes 1, 2, 3 and 4. Requires that the reactor is placed in Mode 5 if requirements for AC, DC, and 118 Vac instrument bus electrical power distribution subsystems are not met.	3.7.A 3.7.A.6	3.8.9 RA-D.1 3.8.9 RA-D.2 3.8.9 RA-E.1
M.2	Expands the list of AC and DC Buses required to be Operable to include all buses that power equipment required by the ITS to be Operable in Modes 1, 2, 3 and 4. ITS Table B 3.8.9-1 includes a detailed list of the specific buses required to be Operable.	3.7.A.4	3.8.9
M.3	Added Surveillance for periodic verification that required AC, DC, and 118 VAC instrument bus electrical power distribution systems are functioning properly, with the correct circuit breaker alignment.	3.7 4.6	3.8.9.1 SR
ITS SPECIFICATION 3.8.10 - DISTRIBUTION SYSTEMS – SHUTDOWN			
M.1	Adds requirements for Operability and Surveillance testing of any AC, DC or vital instrument bus electrical power subsystem needed to support equipment required to be Operable in Mode 5 or Mode 6 or during movement of recently irradiated fuel.	3.7.F 4.6	LCO 3.8.10

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.9 - REFUELING OPERATIONS

Discussion of Change	Summary of Change	CTS Section	ITS Section
ITS SPECIFICATION 3.9.1 - BORON CONCENTRATION			
M.1	Expands the Applicability from "when fuel is being loaded or unloaded from the reactor" to Mode 6 (i.e., when fuel is in the reactor vessel and the reactor vessel head bolts are less than fully tensioned) for the requirement that the shutdown margin must be greater than or equal to 5% delta k/k; or, boron concentration must be greater than or equal to 2000 ppm.	3.8.B.2 3.8.B.iii	3.9.1 APP 3.9.1 RA-A.3
M.2	Adds explicit statement that requirements for refueling boron concentrations apply to "the Reactor Coolant System, the refueling canal, and the refueling cavity" with the clarification that the limits apply to the refueling canal, and the refueling cavity only when these volumes are connected to the RCS.	3.8.B.2	3.9.1 LCO
M.3	Adds requirement to "Suspend positive reactivity additions" immediately whenever minimum reactor boron concentration are not met.	3.8.B.3	3.9.1 RA-A.2
M.4	Adds requirement to suspend the movement of any sources or reactivity control components, within the reactor vessel in addition to the requirement to suspend "loading and unloading fuel from the reactor" when the requirement for minimum reactor boron concentration is not met.	3.8.B.2	1.0 3.9.1
ITS SPECIFICATION 3.9.2 - NUCLEAR INSTRUMENTATION			
M.1	Adds new restriction against "the movement of neutron source bearing assemblies," other sources, or reactivity control components when requirements for a minimum two Operable source range monitors are not met when in Mode 6.	3.8.A.2	3.9.2 RA-A.1 1.0
M.2	Adds requirement to immediately "Suspend operations that would cause introduction into the RCS, coolant with boron concentration less than required to meet the boron concentration of LCO 3.9.1" whenever the requirement for 2 Operable SRMs is not met when in Mode 6.	3.8.A.2	3.9.2 RA-A.2

Discussion of Change	Summary of Change	CTS Section	ITS Section
M.3	Adds new requirement that audible indication (i.e., audible count rate) is available at all times in Mode 6. Adds requirement for immediate initiation of action to isolate unborated water sources if the required SRM alarm (i.e., audible count rate indication) function is not Operable.	3.8.A.2	3.9.2 LCO 3.9.2 RA-C.1
M.4	Adds an explicit requirement for periodic calibration of the source range nuclear detectors (including required audible count rate and indication functions) when in Mode 6.	T 4.1-1, No.3	3.9.2.2 SR
ITS SPECIFICATION 3.9.3 – CONTAINMENT PENETRATIONS			
M.1	Adds requirement that "One door in each air lock is capable of being closed" during movement or recently irradiated fuel.	3.8.A 3.8.B 3.6.A.1	3.9.3.b
M.2	Adds requirement for verification every 7 days that "each required containment penetration is in the required status" (i.e., Operable or closed) during the movement of irradiated fuel in containment.	3.8.A.1 3.8.B.8	3.9.3.1 SR
ITS SPECIFICATION 3.9.4 - RESIDUAL HEAT REMOVAL (RHR) AND COOLANT CIRCULATION - HIGH WATER LEVEL			
M.1	Limits the amount of time that the required RHR pump may be removed from operation to less than or equal to 1 hour per 8 hour period and only if no operations are permitted that would cause reduction of the Reactor Coolant System boron concentration.	3.8.A.6	3.9.4 LCO
M.2	Adds requirements to ensure that all containment penetrations are either closed or can be closed if requirements for redundant decay heat removal capability and forced flow in the reactor coolant system are not met.	3.8.A.3 3.8.A.5	3.9.4 RA-A.1 3.9.4 RA-A.3 3.9.4 RA-A.4 3.9.4 RA-A.5 3.9.4 RA-A.6.1 3.9.4 RA-A.6.2
M.3	Adds requirement for verification every 12 hours that the required RHR loop is in operation and circulating reactor coolant at a flow rate greater than or equal to the rate needed to prevent boron stratification and provide adequate heat removal.	3.8.A.3	3.9.4.1 SR

Discussion of Change	Summary of Change	CTS Section	ITS Section
ITS SPECIFICATION 3.9.5 - RESIDUAL HEAT REMOVAL (RHR) AND COOLANT CIRCULATION - LOW WATER LEVEL			
M.1	Limits the amount of time that the required RHR pump may be removed from operation when in Mode 6 with water level less than 23 feet above the RPV flange to less than or equal to 15 minutes and only when switching from one RHR loop to the other and only if the following restrictions are met: a. The core outlet temperature is maintained greater than 10 degrees F subcooled (i.e., below saturation temperature); b. No operations are permitted that would cause a reduction of the Reactor Coolant System boron concentration; and c. No draining operations to further reduce RCS water volume are permitted.	3.8.A.6	3.9.5
M.2	Adds requirements to ensure that all containment penetrations are either closed or can be closed if requirements for decay heat removal capability and forced flow in the reactor coolant system are not met.	3.8.A.3 3.8.A.5	3.9.5 RA-B.1 3.9.5 RA-B.2 3.9.5 RA-B.3 3.9.5 RA-B.4 3.9.5 RA-B.5.1 3.9.5 RA-B.5.2
M.3	Adds requirement for verification every 12 hours that the required RHR loop is in operation and circulating reactor coolant at a flow rate greater than or equal to the rate needed to prevent boron stratification and provide adequate heat removal.	3.8.A.4	3.9.5.1 SR
M.4	Adds requirement for verification every 7 days of the correct breaker alignment and that power is available to the Operable pump that is not in operation.	3.8.A.4	3.9.5.2 SR
ITS SPECIFICATION 3.9.6 - REFUELING CAVITY WATER LEVEL			
M.1	Adds a requirement to verify every 24 hours that the water level is at least 23 feet above the top of the reactor pressure vessel flange whenever movement of irradiated fuel is taking place inside the containment.	3.8.B.11	3.9.6.1 SR

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 4.0 - DESIGN FEATURES

Discussion of Change	Summary of Change	CTS Section	ITS Section
M.1	Adds an explicit requirement that the spent fuel storage pit shall be maintained to prevent inadvertent draining of the pool below a nominal elevation of approximately 89 feet which is an existing design feature of the fuel storage pit.	None	4.3.2
M.2	Adds an explicit requirement that the spent fuel pit is designed and shall be maintained with a storage capacity limited to no more than 269 fuel assemblies in Region I and 1105 fuel assemblies in Region II, which is an existing design feature of the fuel storage pit.	None	4.3.3
M.3	Includes in Technical Specifications that "a sufficient center-to-center distance" is revised to indicate that the center to center spacing of the new fuel rack must be at least 20.5 inches.	5.4.2.A	4.3.1.2.c

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 5.0 - ADMINISTRATIVE CONTROLS

Discussion of Change	Summary of Change	CTS Section	ITS Section
ITS SPECIFICATION 5.1 - RESPONSIBILITY			
M.1	Adds explicit requirement that the plant manager or his designee must approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that affect nuclear safety.	None	5.1.1
M.2	Adds specific requirement that the shift supervisor (SS) is responsible for the control room command function.	6.1.2	5.1.2
ITS SPECIFICATION 5.2 - ORGANIZATION			
M.1	Adds new prohibitions against routine deviations from overtime restrictions and adds requirement for a periodic independent review be conducted to ensure that excessive hours have not be assigned.	6.2.2.g	5.2.2.e
ITS SPECIFICATION 5.3 – UNIT STAFF QUALIFICATIONS			
	NONE		
ITS SPECIFICATION 5.4 - PROCEDURES			
M.1	Adds explicit requirement to have written procedures for all of the programs listed in ITS Section 5.5.	6.8.1	5.4.1 5.5
M.2	Adds explicit requirement to have written procedures for emergency operating procedures required to implement the requirements of NUREG-0737, Supplement 1, as stated in Generic Letter 82-33.	6.8.1	5.4.1.b

Discussion of Change	Summary of Change	CTS Section	ITS Section
ITS SPECIFICATION 5.5 - PROGRAMS AND MANUALS			
ITS SPECIFICATION 5.5.1 - OFFSITE DOSE CALCULATION MANUAL (ODCM)			
M.1	Adds definition and specific requirements about what is required to be in the Offsite Does Calculation Manual (ODCM).	6.15.1	5.5.1.a
M.2	Adds requirement that changes to the ODCM requiring plant manager approval (with the recommendation of the Station Nuclear Safety Committee (SNSC)) and not just SNSC approval.	6.15.2	5.5.1.b
M.3	Establishes more explicit criteria for a determination that changes to the ODCM will not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.	6.15.2.1.b	5.5.1.a.2
ITS SPECIFICATION 5.5.2 - PRIMARY COOLANT SOURCES OUTSIDE CONTAINMENT			
	NONE		
ITS SPECIFICATION 5.5.3 - RADIOACTIVE EFFLUENT CONTROLS PROGRAM			
	NONE		
ITS SPECIFICATION 5.5.4 - COMPONENT CYCLIC OR TRANSIENT LIMIT			
M.1	Adds requirement to develop and maintain a program that tracks cyclic and transient occurrences to ensure that components are maintained within the design limits. This program is currently required by UFSAR, Section 4.1.5, Cyclic Loads.	None	5.5.4
ITS SPECIFICATION 5.5.5 – REACTOR COOLANT PUMP FLYWHEEL INSPECTION PROGRAM			
	NONE		

Discussion of Change	Summary of Change	CTS Section	ITS Section
ITS SPECIFICATION 5.5.6 - INSERVICE TESTING PROGRAM			
	NONE		
ITS SPECIFICATION 5.5.7 - STEAM GENERATOR (SG) TUBE SURVEILLANCE PROGRAM			
	NONE		
ITS SPECIFICATION 5.5.8 - SECONDARY WATER CHEMISTRY PROGRAM			
	NONE		
ITS SPECIFICATION 5.5.9 - VENTILATION FILTER TESTING PROGRAM (VFTP)			
	NONE		
ITS SPECIFICATION 5.5.10 - EXPLOSIVE GAS AND STORAGE TANK RADIOACTIVITY MONITORING PROGRAM			
	NONE		
ITS SPECIFICATION 5.5.11 - DIESEL FUEL OIL TESTING PROGRAM			
M.1	Adds new requirement that a diesel fuel oil testing program is maintained with specific Technical Specification requirements for acceptance criteria and testing frequency.	4.6	5.5.11
ITS SPECIFICATION 5.5.12 – TECHNICAL SPECIFICATIONS (TS) BASES CONTROL PROGRAM			
M.1	Adds requirement to develop and maintain a Technical Specification Bases Control Program.	None	5.5.12
ITS SPECIFICATION 5.5.13 - SAFETY FUNCTION DETERMINATION PROGRAM (SFDP)			
M.1	Adds requirement to develop and maintain a Safety Function Determination Program.	None	5.5.13

Discussion of Change	Summary of Change	CTS Section	ITS Section
ITS SPECIFICATION 5.5.14 - CONTAINMENT LEAKAGE RATE TESTING PROGRAM			
	NONE		
ITS SPECIFICATION 5.5.15 – BATTERY MONITORING AND MAINTENANCE PROGRAM			
M.1	Adds requirement to develop and maintain a Battery Monitoring and Maintenance Program.	None	5.5.15
ITS SPECIFICATION 5.6 - REPORTING REQUIREMENTS			
M.1	Adds requirement to submit a report to the NRC whenever any instrument required by ITS 3.3.3 (i.e., any RG 1.97, Type A instruments, and any RG 1.97, Category I, non-Type A instruments) is inoperable and not restored within the required allowable out of service time. The report is required to outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to Operable status.	6.9.2.h 3.5 T 3.5-5	5.6.6 3.3.3
M.2	Not Used.	NA	NA