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Change to
Tech Specs*

SUBJECT: Requests implementation of Improved TS within 90 days of
 issuance of final SE to implement Improved TS.

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Carolina Power & Light Company

Robinson Nuclear Plant
3581 West Entrance Road
Hartsville SC 29550

RNP File No: 13510HA

Serial: RNP-RA/97-0194

SEP 10 1997

United States Nuclear Regulatory Commission
Attn: Document Control Desk
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**H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
TRANSMITTAL OF SUPPLEMENT 8 REGARDING THE
TECHNICAL SPECIFICATION CHANGE REQUEST TO CONVERT
TO THE IMPROVED STANDARD TECHNICAL SPECIFICATIONS**

Gentlemen:

This letter provides Supplement 8 to the Carolina Power & Light (CP&L) Company's H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 Improved Technical Specifications (ITS) conversion submittal of August 27, 1996. This supplement is provided to the NRC to incorporate changes as a result of NRC and CP&L reviews.

CP&L requests implementation of the ITS within 90 days of the issuance of the final Safety Evaluation to implement the Improved Technical Specifications (ITS). Implementation of procedures including more restrictive Surveillance Requirements has been ongoing, and CP&L expects to complete implementation of the more restrictive requirements during the week of October 20, 1997. CP&L will consider all ITS Surveillance Requirements (SRs) as met on the date of implementation, with the exception of SR 3.1.7.4, which requires that a CHANNEL CALIBRATION be performed on the Analog Rod Position Indication, and SRs 3.6.3.2, 3.6.7.1, 3.7.4.1, 3.7.6.1, and 3.7.7.1 which require that manual, automatic, and power operated valves in the flow path that are not locked, sealed, or otherwise secured in position are verified in the correct position for the Auxiliary Feedwater System, Containment Spray Additive System, containment integrity valves, Component Cooling Water System, and Service Water System. SR 3.1.7.4 requires voltages be taken at various rod positions and cannot be performed in MODES 1 or 2. Measurement of voltages is a new requirement for this system and was not performed in the previous outage. SR 3.1.7.4 will be performed in the next reactor startup prior to entering MODE 2 from MODE 3. The remaining SRs involve installation of a large number of locks on valves or the performance of valve position verification on a large number of valves. Lock installation and valve position verification is in progress but may not be completed in time for implementation. The remaining SRs will be

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performed within the first Frequency interval (i.e., 31 days as modified by SR 3.0.2) after implementation.

Attachment I provides an affidavit as required by 10 CFR 50.30(b).

Attachment II contains tables summarizing less restrictive changes to the current Technical Specifications (CTS), more restrictive changes to the CTS, relocated details from the CTS to licensee controlled documents, and relocated CTS requirements to licensee controlled documents. These tables are organized by ITS section.

Attachment III contains a description of each change to the submittal contained in Supplement 8, organized in accordance with the ITS Sections.

Attachment IV contains Supplement 8 to the ITS conversion submittal dated August 27, 1996, as modified by letters dated December 18, 1996, January 17, 1997, March 27, 1997, April 6, 1997, April 25, 1997, May 30, 1997, June 13, 1997, June 18, 1997, and August 8, 1997. Instructions for insertion of pages into the submittal are included.

If you have any questions concerning this matter, please contact me or Mr. H. K. Chernoff of my staff at (803) 857-1437.

Very truly yours,



T. M. Wilkerson
Manager - Regulatory Affairs

ALG/alg
Attachments

- I. Affidavit
 - II. Summary Tables of Changes to the Current Technical Specifications.
 - III. Detailed description of Supplement 8.
 - IV. Technical Specifications Change Request To Convert To The Improved Standard Technical Specifications, Supplement 8
- c: Mr. M. K. Batavia, Chief, Bureau of Radiological Health (SC)
Mr. L. A. Reyes, Regional Administrator, USNRC, Region II
Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP (4 copies)
Mr. B. B. Desai, USNRC Resident Inspector, HBRSEP
Attorney General (SC) (w/out Enclosures)
Lockheed Idaho Technology, Inc.

Affidavit

State of South Carolina
County of Darlington

J. S. Keenan, having been first duly sworn, did depose and say that the information contained in letter RNP-RA/97-0194 is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

John S. Keenan

Sworn to and subscribed before me

DEBRA C. JOHNSON
NOTARY
** (Seal) **
PUBLIC
WAKE COUNTY, N.C.
day of September 1997
Debra C. Johnson
Notary Public for South Carolina
My commission expires: June 29, 1999

50-261

CP&L

ROBINSON 2

SUPPLEMENT 8 REGARDING THE TECH SPEC
CHANGE REQUEST TO CONVERT TO
IMPROVED STANDARD TECH SPECS

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Attachment II to Serial: RNP-RA/97-0194
223 pages

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
TECHNICAL SPECIFICATIONS CHANGE REQUEST TO CONVERT TO THE
IMPROVED STANDARD TECHNICAL SPECIFICATIONS

SUMMARY TABLES OF CHANGES TO THE
CURRENT TECHNICAL SPECIFICATIONS

SECTION 1.0 "Use and Application" MATRIX OF LESS RESTRICTIVE CHANGES

Sheet 1 of 1

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
1.0 "Use and Application"					
1.1 L1	The definition for CHANNEL CALIBRATION was relaxed to exclude RTDs and thermocouples, requiring an in place cross channel comparison.	1.1	1.6.2	None	Unique

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 2.0 "Safety Limits (SL)" MATRIX OF LESS RESTRICTIVE CHANGES

Sheet 1 of 1

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
2.0 "Safety Limits (SL)"					
2.0 L1	The requirements for Reactor Coolant System (RCS) Pressure Safety Limits (SL) were reduced to exclude the time when fuel is in the reactor vessel and the reactor vessel head closure bolts are not fully tensioned or the reactor vessel head is removed.	2.1.2	2.2	I	Unique with respect to Applicability details

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.0, "LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY,"
MATRIX OF LESS RESTRICTIVE CHANGES

Sheet 1 of 2

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.0 L1	An exception to complying with required actions when a specification was not met was added to allow for testing of inoperable equipment in order to restore the inoperable equipment to operable status.	LCO 3.0.5	3.0	None	Unique

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
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SECTION 3.0, "LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY,"
MATRIX OF LESS RESTRICTIVE CHANGES

Sheet 2 of 2

3.0 L2	An allowance for extending the frequency by 1.25 times after the first performance of a required action when a specification is not met was added. The frequency must be specified as "once per"	SR 3.0.2	4.0	None	Unique
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Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
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SECTION 3.1, "REACTIVITY CONTROL SYSTEMS," MATRIX OF LESS RESTRICTIVE CHANGES

Sheet 1 of 4

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.1.1, "SHUTDOWN MARGIN (SDM)"					
3.1 L1	The allowed time to restore SDM to within the required limits was extended from no allowed time to 15 minutes.	LCO 3.1.1 Required Action A.1	3.10.8	VII	Unique with respect to allowed outage time extension only
LCO 3.1.2, "Core Reactivity"					
3.1 L7	A requirement was deleted to submit a Special Report to the NRC within 30 days of observance of a difference between predicted and actual boron concentration that is equivalent to one percent in reactivity.	LCO 3.1.2	4.9	VIII	Unique with respect to circumstances of report

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
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SECTION 3.1, "REACTIVITY CONTROL SYSTEMS," MATRIX OF LESS RESTRICTIVE CHANGES

Sheet 2 of 4

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.1.3, "Moderator Temperature Coefficient"					
3.1 L2	A requirement to make the reactor subcritical by an amount greater than or equal to the potential reactivity insertion from depressurization was relaxed to require that administrative control rod withdrawal limits to maintain Moderator Temperature Coefficient (MTC) within limit within 24 hours.	LCO 3.1.3 Required Action A.1	3.1.3.3	None	Unique

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
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- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.1, "REACTIVITY CONTROL SYSTEMS," MATRIX OF LESS RESTRICTIVE CHANGES

Sheet 3 of 4

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.1 L5	The time allowed for shutting down the reactor when the MTC lower limit is not met was extended from eight (8) hours to 12 hours.	LCO 3.1.6 Required Action C.1	3.1.3	None	Unique
3.1 L3	The surveillance requirement for verifying rod freedom of movement was relaxed to apply only to rods not fully inserted and to be performed only every 92 days rather than every 14 days as previously required.	SR 3.1.4.2	Table 4.1-3, Item 2	I, II	Unique with respect to frequency and surveillance applicability details only

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
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SECTION 3.1, "REACTIVITY CONTROL SYSTEMS," MATRIX OF LESS RESTRICTIVE CHANGES

Sheet 4 of 4

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.1.6, "Control Bank Insertion Limits"					
N/A					
LCO 3.1.7, "Rod Position Indication"					
3.1 L6	Requirements were added for rod position indication which provide alternate actions for inoperable position indication to the requirements for rod insertion limits.	LCO 3.1.7	Table 4.1-1, Items 9 and 10	None	Unique
3.1 L8	The frequency of the surveillance requirement to log rod position deviation monitor was relaxed from 1 hour to 4 hours.	SR 3.1.4.1	Table 3.5-2	II	Unique with respect to Frequency details only

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
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SECTION 3.2, "POWER DISTRIBUTION LIMITS," MATRIX OF LESS RESTRICTIVE CHANGES

Sheet 1 of 9

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.2.1, "Heat Flux Hot Channel Factor"					
3.2 L1	The requirements for the heat flux hot channel factor were limited to apply only to MODE I rather than all times as previously applied.	LCO 3.2.1 Applicability	3.10.2	I	Unique with respect to applicability details only
3.2 L2	The allowed time to reduce the overpower and overtemperature ΔT setpoints when the heat flux hot channel factor limit cannot be met was extended from 24 hours to 72 hours.	LCO 3.2.1 Required Action A.2.3	3.10.2.1.1	VII	Unique with respect to allowed outage time extension only.

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
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SECTION 3.2, "POWER DISTRIBUTION LIMITS," MATRIX OF LESS RESTRICTIVE CHANGES

Sheet 2 of 9

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.2.2, "Nuclear Enthalpy Rise hot Channel Factor"					
3.2 L3	The requirements for the heat flux hot channel factor were limited to apply only to MODE 1 rather than all times as previously applied.	LCO 3.2.2 Applicability	3.10.2.1	I	Unique with respect to applicability details only
3.2 L4	The requirement to perform a surveillance to verify the nuclear enthalpy rise hot channel factor is within limits after exceeding by 10% the power level at which the heat flux hot channel factor was last determined was deleted.	LCO 3.2.2	3.10.2.1.1	II	Unique with respect to frequency details only

Categories

- I.. Relaxation of Applicability.
- II.. Relaxation of Surveillance Frequency
- III.. LCO stated in terms of Trains rather than components
- IV.. Allowed Outage Time Extension from 24 hours to 72 hours
- V.. Relaxation of Required Actions
- VI.. Relaxation of Surveillance Requirement acceptance criteria
- VII.. Relaxation of Allowed Outage Time
- VIII.. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.2, "POWER DISTRIBUTION LIMITS," MATRIX OF LESS RESTRICTIVE CHANGES

Sheet 3 of 9

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.2 L5	Requirements to reduce the overpower and overtemperature ΔT setpoints if the nuclear enthalpy rise hot channel factor is not met within 24 hours were deleted.	LCO 3.2.2	3.10.2.1.1	V	Unique with respect to required actions that are deleted
LCO 3.2.3, "Axial Flux Difference (AFD) (PDC-3 Axial offset Control Methodology)"					
3.2 L6	A requirement was deleted to reduce the high neutron flux setpoints to below 55% when accumulated penalty deviation time exceeds one (1) hour.	LCO 3.2.3	3.10.2.7	V	Unique with respect to required actions that are deleted

Categories

- I. Relaxation of Applicability.
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SECTION 3.2, "POWER DISTRIBUTION LIMITS," MATRIX OF LESS RESTRICTIVE CHANGES

Sheet 4 of 9

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.2 L7	An allowance was added to permit a total of 16 hours of operation to be accumulated with AFD outside of the target band without penalty deviation time during surveillance of the power range channels.	LCO 3.2.3 Applicability	3.2.3	None	Unique

Categories

- I. Relaxation of Applicability.
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SECTION 3.2, "POWER DISTRIBUTION LIMITS," MATRIX OF LESS RESTRICTIVE CHANGES

Sheet 5 of 9

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.2 L8	A requirement to log AFD every half hour after the first 24 hours that the AFD monitor is out of service was relaxed to once within one (1) hour and every one (1) hour when thermal power is < 90% of rated thermal power or 0.9 Allowable Power Level whichever is less.	SR 3.2.3.2	3.10.2.10	II	Unique with respect to frequency details

Categories

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SECTION 3.2, "POWER DISTRIBUTION LIMITS," MATRIX OF LESS RESTRICTIVE CHANGES

Sheet 6 of 9

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.2 L9	The requirement to perform a surveillance to determine the AFD target flux difference after exceeding by 10% the power level at which the heat flux hot channel factor was last determined was deleted.	LCO 3.2.3	3.10.2.1.1	II	Unique with respect to frequency details only

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
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SECTION 3.2, "POWER DISTRIBUTION LIMITS," MATRIX OF LESS RESTRICTIVE CHANGES

Sheet 7 of 9

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.2.4, "Quadrant Power Tilt Ratio"					
3.2 L10	Requirements for quadrant power tilt ratio (QPTR) were relaxed to apply only to MODE 1 with thermal power above 50% rated thermal power to not include power increases below 50% rated thermal power.	LCO 3.2.4 Applicability	3.10.3.1	I	Unique with respect to applicability details only
3.2 L11	A requirement was deleted to reduce the high neutron flux setpoints to two percent of rated values for every percent of indicated power tilt ratio exceeding 1.0 when QPTR exceeds 1.02.	LCO 3.2.4	3.10.3.1	V	Unique with respect to required actions that are deleted

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.2, "POWER DISTRIBUTION LIMITS," MATRIX OF LESS RESTRICTIVE CHANGES

Sheet 8 of 9

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.2 L12	Requirements were relaxed to permit continued operation above 50% rated thermal power with QPTR in excess of limits for greater than 24 hours. A requirement to reduce the high neutron flux setpoints to 55% rated thermal power if QPTR remains in excess of limits for greater than 24 hours was deleted.	LCO 3.2.4	3.10.3.1	V	Unique with respect to required actions that are deleted

Categories

- I. Relaxation of Applicability.
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SECTION 3.2, "POWER DISTRIBUTION LIMITS," MATRIX OF LESS RESTRICTIVE CHANGES

Sheet 9 of 9

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.2 L13	Requirements were deleted that were associated with the condition that QPTR is greater than 1.09 simultaneous with a misaligned rod.	LCO 3.2.4	3.10.3.2 3.10.3.3	V	Unique with respect to required actions that are deleted

Categories

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SECTION 3.3, "INSTRUMENTATION," MATRIX OF LESS RESTRICTIVE CHANGES

Sheet 1 of 31

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.3.1, "Containment"					
3.3 L1	Allowable values have been specified for trip setpoints in accordance with the licensee setpoint methodology procedure. The allowable values for the overtemperature and overpressure ΔT setpoints are less restrictive.	LCO 3.3.1 Table 3.3.1-1, Functions 5 and 6	2.3.1.2	None	Unique

Categories

- I. Relaxation of Applicability.
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- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.3, "INSTRUMENTATION," MATRIX OF LESS RESTRICTIVE CHANGES

Sheet 2 of 31

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L2	An instrument tolerance of $\pm 10\%$ was added to the time constants for the overtemperature and overpressure ΔT setpoints. Inequality signs were added for parameters in the overtemperature and overpressure ΔT setpoints.	Table 3.3.1-1, Functions 5 and 6	2.3.1.2	None	Unique
3.3 L3	The allowed time to place a channel into tripped condition was extended from one (1) hour to six (6) hours in accordance with WCAP 10271-P-A.	LCO 3.3.1 Required Action E	Table 3.5-2 ACTION 6	VII	Allowed Outage Time Extension from 1 hour to 6 hours.

Categories

- I. Relaxation of Applicability.
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- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.3, "INSTRUMENTATION," MATRIX OF LESS RESTRICTIVE CHANGES

Sheet 3 of 31

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L4	The allowed time to place a channel into tripped condition was extended from one (1) hour to six (6) hours in accordance with WCAP 10271-P-A. The shutdown requirement for when a channel cannot be placed in trip as required was relaxed to require only that reactor power be reduced to below the P-7 interlock within 12 hours, rather than to be in MODE 3 in 8 hours.	LCO 3.3.1 Required Actions M Function 11	Table 3.5-2 Item 14 ACTION 7	V, VII	Allowed Outage Time Extension from 1 hour to 6 hours, relaxation of shutdown requirement

Categories

- I. Relaxation of Applicability.
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SECTION 3.3, "INSTRUMENTATION," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L5	Mode applicability for certain reactor trip functions were relaxed to require the functions only above the P-7 interlock.	LCO 3.3.1 Table 3.3.1-1 Notes (h) and (f)	Table 3.5-2 Notes **** and *****	I	Unique with respect to applicability details only
3.3 L6	The allowed time for an inoperable manual reactor trip function was extended from 12 hours to 48 hours and the time to be in MODE 3 extended from 20 hours to 54 hours.	LCO 3.3.1 Required Action B	Table 3.5-2 ACTION 1	VII	Allowed Outage Time Extension from 12 hours to 48 hours, allowed shutdown time Extension from 20 hours to 54 hours

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L7	The requirement to monitor Quadrant Power Tilt Ratio (QPTR) every 12 hours with one excore channel inoperable is relaxed to require monitoring only when the channel input to QPTR is inoperable.	LCO 3.3.1 Required Action D.2.2	Table 3.5-2 ACTION 2	None	Unique
3.3 L8	The allowed time to place a channel into tripped condition was extended from one (1) hour to six (6) hours in accordance with WCAP 10271-P-A. A requirement to reduce thermal power to \leq 85% rated thermal power when one channel is inoperable was eliminated.	LCO 3.3.1 Required Action E	Table 3.5-2 ACTION 2	VII and elimination of requirement	Allowed Outage Time Extension from 1 hour to 6 hours, and unique with respect to elimination of requirement

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L9	The requirements for two inoperable intermediate range neutron flux channels were relaxed to require only that reactor power be reduced to below the P-6 interlock within two (2) hours and to suspend operations involving positive reactivity additions, rather than to be in MODE 3 in 8 hours.	LCO 3.3.1 Required Action G	3.10.5	None	Unique

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L10	The allowed time to place a channel into tripped condition was extended from one (1) hour to six (6) hours in accordance with WCAP 10271-P-A. The shutdown requirement for when a channel cannot be placed in trip as required was relaxed to require only that reactor power be reduced to below the P-7 interlock within 10 hours, rather than to be in MODE 3 in 8 hours.	LCO 3.3.1 Table 3.3.1-1 Functions 2a, 8, 9, 12	Table 3.5-2 Items 7, 9, 10, 13	V, VII	Allowed Outage Time Extension from 1 hour to 6 hours, relaxation of shutdown requirement

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.3, "INSTRUMENTATION," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L11	The allowed time to place a channel into tripped condition was extended from one (1) hour to six (6) hours in accordance with WCAP 10271-P-A. The shutdown requirement for when a channel cannot be placed in trip as required was relaxed to require only that reactor power be reduced to below the P-7 interlock within 10 hours, rather than to be in MODE 3 in 8 hours.	LCO 3.3.1 Table 3.3.1-1 Function 15	Table 3.5-2 Item 11	V, VII	Allowed Outage Time Extension from 1 hour to 6 hours, relaxation of shutdown requirement

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L12	The requirements for underfrequency and undervoltage trips have been relaxed to apply only to MODE 1, rather than reactor critical, as was previously required.	LCO 3.3.1 Table 3.3.1-1 Functions 11 and 12	Table 3.5-2 Items 13 and 14	I	Unique with respect to applicability details
3.3 L14	The frequency of surveillance requirements for the nuclear power range and reactor coolant temperature trip functions were relaxed from bi-weekly to 92 days in accordance with WCAP 10271-P-A.	LCO 3.3.1 Table 3.3.1-1 Functions 2a, 5, and 6 SR 3.3.1.7 SR 3.3.1.8	Table 4.1-1 Items 1, 4	II	Unique with respect to surveillance frequency

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L15	The frequency of surveillance requirements as it applies to reactor startup for the nuclear intermediate range and source range were relaxed from requiring the surveillance to be performed within 77 days prior to startup to within 92 days prior to startup in accordance with WCAP 10271-P-A.	LCO 3.3.1 Table 3.3.1-1 Functions 3 and 4 SR 3.3.1.7 SR 3.3.1.8	Table 4.1-1 Items 2, 3	II	Unique with respect to surveillance frequency

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L16	The frequency of surveillance requirements for the reactor coolant flow, pressurizer pressure, Reactor Coolant Pump (RCP) voltage, steam generator level, steam/feedwater flow mismatch, and low steam generator level functions were relaxed from monthly to 92 days in accordance with WCAP 10271-P-A.	LCO 3.3.1 Table 3.3.1-1 Functions 9, 8, 7, 11, 13, and 14	Table 4.1-1 Items 5, 6, 7, 8, 11, 39, 40	II	Unique with respect to surveillance frequency
3.3 L17	The frequency of surveillance requirements for the turbine first stage pressure function was relaxed from monthly to 18 months.	LCO 3.3.1 Table 3.3.1-1 Function 17e	Table 4.1-1 Item 25	II	Unique with respect to surveillance frequency

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L18	The frequency of surveillance requirements for actuation logic testing were relaxed from monthly to 31 days on a staggered test basis.	LCO 3.3.1 SR 3.3.1.5	Table 4.1-1 Item 27	II	Unique with respect to surveillance frequency, See LCO 3.3.2 L18, Bin with L19
3.3 L19	The frequency of surveillance requirements for reactor trip breaker testing were relaxed from monthly to 31 days on a staggered test basis.	LCO 3.3.1 SR 3.3.1.4	Table 4.1-1 Item 30	II	Unique with respect to surveillance frequency, Bin with L18

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L20	The frequency of surveillance requirements for reactor trip bypass breaker testing were relaxed from monthly to 31 days on a staggered test basis.	LCO 3.3.1 SR 3.3.1.4	Table 4.1-1 Item 47	II	Unique with respect to surveillance frequency, Bin with L18
3.3 L35	Applicability was reduced in MODES 3, 4 and 5 for manual reactor trip, source range neutron flux, reactor trip breakers, reactor trip breaker UV and shunt trip mechanism and automatic trip logic.	Table 3.3.3-1 Note a	Table 3.5-2 Note (*)	I	Unique with respect to reduced Applicability.

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L36	Required Action was relaxed to permit exiting Applicability by increasing power to \geq P-10 setpoint.	LCO 3.3.1 Required Action F	Table 3.5-2 ACTION 3	None	Unique with respect to reduction in Required Action.
3.3 L37	Completion Time was relaxed by adopting Required Action permitting 6 hours to restore channel where no restoration time was previously provided.	LCO 3.3.1 Required Action O	N/A	VII	Unique with respect to increased Completion Time.
3.3 L38	Required Action was relaxed to permit two Neutron flux intermediate range channels inoperable when below the P-6 setpoint.	LCO 3.3.1 Required Action H	Table 3.5-2 ACTION 3	V VII	Unique with respect to Applicability.

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L39	SR frequency was relaxed to eliminate monthly calibration for Nuclear Power range channels.	SR 3.3.1.11	Table 4.1-1 Item 1	II	Unique with respect to Frequency.
3.3 L40	SR frequencies were relaxed to permit delaying performance of certain SRs until a specified interval after achieving specified unit conditions.	SR 3.3.1.2 SR 3.3.1.3 SR 3.3.1.6 SR 3.3.1.7	Table 4.1-1 Items 1, 3, & 4	II	Unique with respect to Frequency.
3.3 L41	Surveillance requirements are relaxed by excluding neutron detectors from calibration.	SR 3.3.1.11	Table 4.1-1 Items 1, 2, 3	None	Unique with respect to SR scope.

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.3.2, "ESFAS Instrumentation"					
3.3 L13	Requirements for automatic actuation logic and actuation relays for the Engineered Safety Features Actuation System were added, which include allowed outage times which were not previously permitted.	LCO 3.3.2 Table 3.3.2-1 Functions 1.b, 2.b, 3.a(2), 3.b(2), 4.b, and 5.a Required Actions C and G	Table 3.5-4	VII	Unique with respect to allowed outage time details
3.3 L18	The frequency of surveillance requirements for actuation logic testing were relaxed from monthly to 31 days on a staggered test basis.	LCO 3.3.2 SR 3.3.2.2	Table 4.1-1 Item 27	II	Unique with respect to surveillance frequency. See LCO 3.3.1 L18

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L21	The allowed time for an inoperable channel to remain in the tripped condition was relaxed from the surveillance frequency interval to continuous operation. The allowed time to place a channel into tripped condition was extended from one (1) hour to six (6) hours in accordance with WCAP 10271-P-A.	LCO 3.3.2 Required Actions C, D, E, and G	Table 3.5-3 ACTION 12	VII	Unique with respect to allowed outage time details
3.3 L42	Applicability for steam line isolation functions was reduced to exclude when MSIVs are closed.	LCO 3.3.2-1 Note e	Table 3.5-4 Functions 2A, 2B, 2C & 2D	I	Reduced applicability due to position of actuated equipment. Bin with L43, L46 and L49.

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L43	Applicability for feedwater isolation functions was reduced to exclude when MFIVs MFRVs and bypass valves are closed or isolated by a closed manual valve.	Table 3.3.2-1 Note f	3.0	I	Reduced applicability due to position of actuated equipment. Bin with L42, L46 and L49.

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L50	Requirements relaxed to permit all channels of a ESFAS Instrument function or a single ESFAS instrumentation train (except for manual Actuation functions) to be inoperable for maintenance or surveillance testing for up to 12 hours.	LCO 3.3.2 Required Actions Note 2	N/A	None	Unique with respect to Action relaxation.
3.3 L51	The frequency of surveillance requirements for containment pressure testing were relaxed from 84 days to 92 days in accordance with WCAP-10271-P-A.	SR 3.3.2.4 Functions 3.a(3) and 3.b(3)	Table 4.1-1	II	Unique with respect to surveillance frequency

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L52	The frequency of surveillance requirements for steam generator pressure were relaxed from 31 days to 92 days in accordance with WCAP-10271-P-A	SR 3.3.2.4 Functions 1.e, 1.g, 4.e	Table 4.1-1	II	Unique with respect to surveillance frequency

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.3.3, "Post Accident Monitoring (PAM) Instrumentation"					
3.3 L22	The allowed time for an inoperable containment high range radiation monitoring channel was extended from 7 days to 30 days.	LCO 3.3.3 Table 3.3.3-1 Function 10	Table 3.5-5	VII	Unique with respect to allowed outage time
3.3 L23	The allowed time for an inoperable auxiliary feedwater (AFW) flow indicator channel was extended from 7 days to 30 days.	LCO 3.3.3 Table 3.3.3-1 Function 19	Table 3.5-5 Note 1	VII	Unique with respect to allowed outage times only, Bin with L22

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.3, "INSTRUMENTATION," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L24	The requirements for both inoperable containment hydrogen monitoring channels were relaxed to require only that MODE 4 be reached within 6 hours, rather than MODE 5 within 36 hours as was previously required.	LCO 3.3.3 Required Action E	Table 3.5-5 Note 6	V	Unique with respect to required actions only

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L25	The allowed time for an inoperable thermocouple channel was extended from 7 days to 30 days. If the channel cannot be restored as required, requirements were relaxed to require only a special report to the NRC, rather than to shut down the reactor.	LCO 3.3.3 Required Actions A and B	Table 3.5-5 Note 8	VII	Unique with respect to allowed outage time, unique with respect to removal of shutdown requirement
3.3 L26	The allowed time for an inoperable thermocouple channel was extended from 48 hours to 7 days.	LCO 3.3.3 Table 3.3.3-1 Functions 15-18	Table 3.5-5 Note 8	VII	Unique with respect to allowed outage time details

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L27	A refueling interval test requirement for pressurizer Power Operated Relief Valve (PORV) position indication, block valve position indication, and safety valve position indication was relaxed was eliminated.	LCO 3.3.3	Table 4.1-1 Items 35, 36, 37	None	Unique.
3.3 L44	Requirements two PAM channels inoperable were relaxed to eliminate shutdown requirements when initiation of alternative monitoring is not established within 7 days.	LCO 3.3.3 Required Action H	Table 3.5-5 Note 5	VII	Unique with respect to Required Actions.

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L49	Requirements for the steam line isolation - containment pressure-high-high function were relaxed to exclude MODE 3 when all MSIVs are closed and to exclude MODE 4.	Table 3.3.2-1 Function 4.c	Table 3.5-4 Item 2.c	I	Unique with respect to required actions. Bin with L42 L43 and L46.

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.3.4 "Remote Shutdown System"					
None					
LCO 3.3.5, "LOP DG Start Instrumentation"					
3.3 L28	Requirements for Diesel Generator (DG) start instrumentation were relaxed by allowing entry into the required actions for the DG made inoperable instead of requiring the unit to be shut down. AN allowed outage time of one (1) was permitted to restore one or more inoperable channels.	LCO 3.3.5 Required Actions A and D	Table 3.5-3 Functional Unit 3.a ACTION 14	V, VII	Reduction in Required Actions by entering Condition and Required Action of supported equipment. Bin with L29.

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.3, "INSTRUMENTATION," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L29	The allowed outage time for an inoperable degraded voltage channel to be placed in trip was relaxed from one (1) hour to six (6) hours. Requirements were relaxed by allowing entry into the required actions for the DG made inoperable instead of requiring the unit to be shut down.	LCO 3.3.5 Required Actions B and D	Table 3.5-3 Functional Unit 3B ACTION 14	V, VII	Reduction in Required Actions by entering Condition and Required Action of supported equipment. Bin with L28.
N/A					

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.3, "INSTRUMENTATION," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L45	Surveillance testing requirements were relaxed to permit excluding injection of the test signal into channel during the functional test.	SR 3.3.5.1	Table 4.1-1 Item 32	VI	Unique with respect to acceptance criteria. Bin with L48.

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.3.6, "Containment Ventilation Isolation Instrumentation"					
3.3 L31	The surveillance-frequency for testing the containment ventilation isolation instrumentation was relaxed by eliminating testing immediately prior to refueling.	LCO 3.3.6	3.8.1.b	II	Unique with respect to frequency.
3.3 L46	The requirements for an inoperable Containment Ventilation Isolation Phase A function were relaxed to permit continued operation with the purge and vent valves closed and maintained closed.	LCO 3.3.6 Required Action A	Table 3.5-4 Item 1.C.iii	V	Reduced applicability due to position of actuated equipment. Bin with L42, L43 and L49.

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.3.7, "CREFS Actuation Instrumentation"					
None					
LCO 3.3.8, "AFW System Instrumentation"					
3.3 L32	Requirements for the Auxiliary Feedwater (AFW) instrumentation were relaxed by permitting placing channel in trip within six (6) hours instead of maintaining the unit in hot shutdown.	LCO 3.3.8 Required Action B	Table 3.4-1 Function 1	None	Unique with respect to Required Actions
N/A					

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.3, "INSTRUMENTATION," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.3 L47	The surveillance method was relaxed to permit use of an actual signal in addition to a simulated signal for the functional test.	SR 3.3.8.3	Table 4.8-1 Functional Unit e	VI	Unique with respect to acceptance criteria
3.3 L48	The surveillance requirements were relaxed to permit excluding injection of a test signal into the channel during the functional test.	SR 3.3.8.3	Table 4.8-1 Item b and d	VI	Unique with respect to acceptance criteria. Bin with L45.

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.4, "REACTOR COOLANT SYSTEM,"MATRIX OF LESS RESTRICTIVE CHANGES"

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.4.5, "RCS Loops-MODE 3" LCO 3.4.6, "RCS Loops-MODE 4" LCO 3.4.7, "RCS Loops-MODE 5, Loops Filled" LCO 3.4.8, "RCS Loops-MODE 5, Loops not Filled"					
3.4 L1	An allowance was added for Reactor Coolant Pumps (RCPs) and Residual Heat Removal (RHR) Pumps to be de-energized for up to one hour in any eight (8) hour period.	LCO 3.4.5, LCO 3.4.6, LCO 3.4.7	3.3.3.1, 3.3.1.4	None	Unique
3.4 L18	An allowed outage time of 72 hours for a single RCS Loop was added and an action to be in MODE 4 if the loop was not restored within 72 hours was added.	LCO 3.4.5 Required Actions A.1 and B.1	3.1.1.2	VII	Unique with respect to allowed outage time details only.

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.4, "REACTOR COOLANT SYSTEM,"MATRIX OF LESS RESTRICTIVE CHANGES"

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.4 L19	An allowed outage time of one (1) hour was added for the condition where reactivity requirements are not met in the specification.	LCO 3.4.5 Required Action C.1	3.1.1.2	VII	Unique with respect to allowed outage time details only.
3.4 L2	Actions in response to no RCPs or RHR pumps in operation are changed from establishing a required shutdown margin to suspension of operations involving reduction in boron concentration.	LCO 3.4.6	3.1.1.1	V	Unique with respect to required actions

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.4, "REACTOR COOLANT SYSTEM,"MATRIX OF LESS RESTRICTIVE CHANGES"

Sheet 3 of 12

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.4 L3	A requirement was deleted to submit a Special Report to the NRC within 30 days of failure to restore one RCP or RHR pump to operation after one (1) hour during shutdown.	LCO 3.4.6	3.1.1.1	VIII	Unique with respect to circumstances of report
3.4 L4	Requirement was deleted to close containment prior to exceeding 200°F when both RHR pumps are inoperable.	LCO 3.4.6	3.3.1.4	None	Unique

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.4, "REACTOR COOLANT SYSTEM,"MATRIX OF LESS RESTRICTIVE CHANGES"

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.4 L5	Note 1 was added to LCO 3.4.8 that allows all RHR pumps to be deenergized for up to 15 minutes under certain conditions. Note 2 was added to LCOs 3.4.7 and 3.4.8 which allows one RHR train to be inoperable for up to two (2) hours for surveillance testing.	LCO 3.4.6, LCO 3.4.7	3.3.1.4	None	Unique
3.4 L6	An allowance was added to permit use of a steam generator instead of an RHR train for decay heat removal in MODE 5.	LCO 3.4.7	3.3.1.4	None	Unique

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.4, "REACTOR COOLANT SYSTEM,"MATRIX OF LESS RESTRICTIVE CHANGES"

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.4 L16	A requirement was deleted to submit a Special Report to the NRC within 30 days of failure to restore an inoperable RHR train to operation after 14 days during shutdown.	LCO 3.4.7, LCO 3.4.8	3.3.1.4	VIII	Unique with respect to circumstances of report
3.4 L17	A requirement to verify a backup method for decay heat removal when one RHR train is inoperable was deleted.	LCO 3.4.7, LCO 3.4.8	3.3.1.4	None	Unique

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.4, "REACTOR COOLANT SYSTEM,"MATRIX OF LESS RESTRICTIVE CHANGES"

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.4.10, "Pressurizer Safety Valves"					
3.4 L7	The operability limits for the pressurizer code safety valve lift settings were increased from 2485 psig and 2560 psig to 2410 psig and 2560 psig.	LCO 3.4.10	3.1.1.3	None	Unique
3.4 L9	A note was added which allows the pressurizer safety valves lift settings to be outside operability limits for the purpose of testing under certain conditions.	LCO 3.4.10	3.3.1.3	None	Unique

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.4, "REACTOR COOLANT SYSTEM,"MATRIX OF LESS RESTRICTIVE CHANGES"

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.4.12, "Low Temperature Overpressure Protection (LTOP) System"					
3.4 L8	An allowance was added for one Safety Injection (SI) pump to be capable of injecting into the Reactor Coolant System (RCS) when the RCS is $\geq 175^{\circ}\text{F}$.	LCO 3.4.12	3.3.1.3	None	Unique

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.4, "REACTOR COOLANT SYSTEM, "MATRIX OF LESS RESTRICTIVE CHANGES"

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.4.13, "RCS Operational Leakage"					
3.4 L10	A time was allowed for primary to secondary leakage to exceed requirements of four (4) hours and the time required to reach MODE 5 if the leakage is not restored to required limits was extended from 30 hours to 36 hours.	LCO 3.4.13	3.3.1.3	VII	Unique with respect to details of extended Allowed Outage Times
3.4 L11	The Surveillance Frequency for performing a primary system water inventory balance was extended from daily to once every 72 hours.	SR 3.4.13.1	Table 4.1-3, Item 9	II	Unique with respect to details of Frequency

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.4, "REACTOR COOLANT SYSTEM,"MATRIX OF LESS RESTRICTIVE CHANGES"

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.4 L12	The allowance for a Pressure Isolation Valve (PIV) with leakage that exceeds limits to remain unisolated by two valves was extended to four(4) hours and to remain isolated by only one valve was extended to 72 hours.	LCO 3.4.14	3.1.5.4	None	Unique
3.4 L13	The length of time that the plant can be shut down before the Surveillance Requirement for performing PIV testing was extended from 72 hours to 7 days.	SR 3.4.14.1	Table 4.1-3, Item 17	None	Unique

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.4, "REACTOR COOLANT SYSTEM,"MATRIX OF LESS RESTRICTIVE CHANGES"

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.4 L24	Requirements were deleted to record daily the integrity of a remaining PIV and record daily the position of the other closed valve in a line where the integrity of a PIV cannot be determined.	LCO 3.4.14	Table 4.1-3, Item 17	None	Unique
3.4 L14	The requirements for RCS Specific Activity were reduced to be applicable only to MODES 1, 2, and 3 with RCS temperature $\geq 500^{\circ}\text{F}$.	LCO 3.4.16 Applicability	3.1.4	I	Unique with respect to details of applicability

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.4, "REACTOR COOLANT SYSTEM,"MATRIX OF LESS RESTRICTIVE CHANGES"

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.4 L15	The Surveillance Frequency for verifying reactor coolant gross specific activity was extended from once every 72 hours to once per 7 days.	SR 3.4.16.1	Table 4.1-2, Item 1	II	Unique with respect to frequency details only.
LCO 3.4.17, "Chemical and Volume Control System (CVCS)"					
3.4 L20	Requirements to bring the plant to MODE 3 and cool down and depressurize the RCS were added where no actions previously existed.	LCO 3.4.17 Required Actions D.1, D.2, and D.3	3.2.3	None	Unique

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
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- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.4, "REACTOR COOLANT SYSTEM,"MATRIX OF LESS RESTRICTIVE CHANGES"

Sheet 12 of 12

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.4 L21	Specific requirements for operability of boron addition pathways were relaxed to apply only to two pathways of makeup water from the Refueling Water Storage Tank (RWST).	LCO 3.4.17	3.2.2	None	Unique
N/A					
3.4 L23	The requirements were relaxed to allow for one makeup water pathway from the RWST to be inoperable rather than individual components.	LCO 3.4.17, Required Action B.1	3.2.3	None	Unique

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.5, "EMERGENCY CORE COOLING SYSTEMS (ECCS)," MATRIX OF LESS RESTRICTIVE CHANGES Sheet 1 of 6

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.5.1, "Accumulators"					
3.5 L1	The allowed time for an accumulator to be inoperable due to boron concentration not within limits was relaxed from four (4) hours time to 72 hours.	LCO 3.5.1 Required Action A.1	3.3.1.2	VII	Unique with respect to allowed outage time extension only

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.5, "EMERGENCY CORE COOLING SYSTEMS (ECCS)," MATRIX OF LESS RESTRICTIVE CHANGES Sheet 2 of 6

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.5.2, "ECCS-Operating"					
3.5 L2	The condition associated with an inoperable Emergency Core Cooling System (ECCS) component was extended to allow one or more trains of ECCS to be inoperable as long as 100% of the ECCS flow equivalent of a single operable train is available. The allowed time for one or more ECCS trains to be inoperable was relaxed from 24 hours to 72 hours.	LCO 3.5.2 Required Action A.1	3.3.1.2	III, IV	

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.5, "EMERGENCY CORE COOLING SYSTEMS (ECCS)," MATRIX OF LESS RESTRICTIVE CHANGES Sheet 3 of 6

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.5 L8	A note was added to permit operation in MODE 3 with one required Safety Injection (SI) pump inoperable for a limited period of four (4) hours pursuant to the specifications for Reactor Coolant System overpressure protection.	LCO 3.5.2	3.3.1.2	None	Unique
3.5 L3	A requirement to restrict surveillance testing of the ECCS such that the ECCS is prevented from injecting into the Reactor Coolant System (RCS) was deleted.	SR 3.5.2.4 SR 3.5.2.5	4.5.1.1	None	Unique

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.5, "EMERGENCY CORE COOLING SYSTEMS (ECCS)," MATRIX OF LESS RESTRICTIVE CHANGES Sheet 4 of 6

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.5 L4	Detailed requirements for performance of surveillance testing relating to control board indication and visual observation that all components have received the safety injection single in the proper sequence and timing were deleted.	SR 3.5.2.4 SR 3.5.2.5	4.5.1.2	None	Unique
3.5 L5	Detailed requirements to monitor control room indication and controls during performance of surveillance testing were deleted.	SR 3.5.2.1	4.5.2.1	None	Unique

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.5, "EMERGENCY CORE COOLING SYSTEMS (ECCS)," MATRIX OF LESS RESTRICTIVE CHANGES Sheet 5 of 6

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.5.3, "ECCS-Shutdown"					
3.5 L6	Requirements for the ECCS during MODE 4 were relaxed to required only one train of ECCS to be required.	LCO 3.5.3 Required Action A.1	3.3.1.2 3.3.1.3	None	Unique

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.5, "EMERGENCY CORE COOLING SYSTEMS (ECCS)," MATRIX OF LESS RESTRICTIVE CHANGES Sheet 6 of 6

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.5.4, "Refueling Water Storage Tank"					
3.5 L7	An allowed outage time of 8 hours was added to the requirements for the Refueling Water Storage Tank (RWST) to be inoperable due to boron concentration not within limits.	LCO 3.5.4 Required Action A.1	3.3.1.1	None	Unique

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.6, "CONTAINMENT SYSTEMS," MATRIX OF LESS RESTRICTIVE CHANGES

Sheet 1 of 8

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.6.1, "Containment"					
L1	Requirements limiting positive reactivity by rod drive motion when containment integrity is not intact are deleted.	3.6.1	3.6.1.c 3.6.1.d	Unique	Unique
LCO 3.6.2, "Containment Air Lock"					
None					

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.6, "CONTAINMENT SYSTEMS," MATRIX OF LESS RESTRICTIVE CHANGES

Sheet 2 of 8

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.6.3, "Containment Isolation Valves"					
L2	Required Actions to isolate containment penetrations were relaxed by a note to allow an inoperable penetration to be unisolated intermittently under administrative control.	3.6.3	3.6.1	V	Unique with respect to the required actions applied
L3	The allowed time to isolate an inoperable containment penetration for a closed system was relaxed from 4 hours to 72 hours.	3.6.3 Required Action C.1	3.6.3	VII	Unique with respect to allowed outage time

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.6, "CONTAINMENT SYSTEMS," MATRIX OF LESS RESTRICTIVE CHANGES

Sheet 3 of 8

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.6.6, "Containment Spray and Cooling Systems"					
3.6 L4	The allowed outage time for a single component of containment cooling fans was relaxed from 24 hours to 7 days for an entire train of containment cooling fans.	3.6.6 Required Action C.1	3.3.2.2	III, VII	Unique with respect to train details and allowed outage time details

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.6, "CONTAINMENT SYSTEMS," MATRIX OF LESS RESTRICTIVE CHANGES

Sheet 4 of 8

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.6 L5	The allowed outage time for a single inoperable containment spray train was extended to 72 hours from 24 hours as was previously required. If the train is not restored to operable status as required, the allowed time to bring the plant to cold shutdown was extended to 156 hours from 72 hours plus the time required to shutdown the reactor utilizing normal operating procedures.	LCO 3.6.6 Required Actions A.1, B.1, and B.2	3.6.2.2 3.6.2.3	VII	Unique with respect to allowed outage times only

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.6, "CONTAINMENT SYSTEMS," MATRIX OF LESS RESTRICTIVE CHANGES

Sheet 5 of 8

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.6 L6	Restrictions that required no inoperability of the diverse cooling subsystem when a containment fan cooler or containment spray pump is inoperable were deleted.	LCO 3.6.6	3.6.2.2	None	Unique
3.6 L7	An allowance for two (2) containment cooling trains to be inoperable for up to 72 hours was added.	LCO 3.6.6 Required Action D.1	3.6.2.2	VII	Unique with respect to allowed outage time details
3.6 L8	A requirement to test the containment cooling units monthly was deleted.	LCO 3.6.6	4.5.1.6	II, VI	Unique

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.6, "CONTAINMENT SYSTEMS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.6.7, "Spray Additive System"					
3.6 L9	The allowed outage time for one (1) inoperable spray system flow path for 24 hours was extended to apply to the spray additive system with at least 100% of the spray additive system train flow available, and the allowed outage time was extended to 72 hours from 24 hours.	LCO 3.6.7 Required Action A.1	3.6.2.2	III, VII	Unique with respect to train and allowed outage time details
3.6 L10	The allowed outage time for an inoperable spray additive system in MODE 3 was extended to 48 hours from no time allowed.	LCO 3.6.7 Required Actions B.1 and B.2	3.6.2.3	VII	Unique with respect to allowed outage time details only

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.6, "CONTAINMENT SYSTEMS," MATRIX OF LESS RESTRICTIVE CHANGES

Sheet 7 of 8

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.6 L11	The required surveillance frequency for verifying NaOH concentration in the spray additive tank was extended from monthly with a maximum time between surveillances of 45 days to 184 days.	SR 3.6.7.3	Table 4.1-2 Item 5	II	Unique with respect to frequency details only

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.6, "CONTAINMENT SYSTEMS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.6.8, "Isolation Valve Seal Water System"					
3.6 L12	The allowed outage time for a single inoperable Isolation Valve Seal Water (IVSW) system was extended to apply to the entire system. The allowed outage time for the IVSW system was extended from 24 hours to 72 hours. The time allowed to reach MODE 3 when the IVSW cannot be restored as required was extended to 80 hours from 32 hours.	LCO 3.6.8 Required Action A.1, B.1	3.6.6.1	III, VII	Unique with respect to train and allowed outage time details only

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.7, "PLANT SYSTEMS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.7.1, "Main Steam Safety Valves"					
3.7 L1	An allowance was added for one or more Main Steam Safety Valves (MSSV) to be inoperable.	LCO 3.7.1, Table 3.7.1-1	3.4.1.a	None	Unique
3.7 L2	A Note was added to ITS actions for separate condition entry for each inoperable MSSV.	LCO 3.7.1 Note to Actions	3.4.1.a	None	Unique
LCO 3.7.2, "Main Steam Isolation Valves"					
3.7 L3	The requirements for the Main Steam Isolation Valves (MSIVs) were relaxed to apply to only when the MSIVs are open	LCO 3.7.2 Applicability	3.4.1.a	I	Unique with respect to details of Applicability.

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time

SECTION 3.7, "PLANT SYSTEMS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.7 L4	The frequency for performing a Surveillance on the MSIVs was extended from every 15 months to as specified by IST.	SR 3.7.2.1	4.7.1	II	Unique with respect to frequency details only.
LCO 3.7.4, "Auxiliary Feedwater System"					
3.7 L5	An action and Note were added for the condition of a complete loss of the Auxiliary Feedwater (AFW) Function.	LCO 3.7.4 RA E.1	3.4.4	None	Unique
N/A					

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time

SECTION 3.7, "PLANT SYSTEMS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
N/A					
3.7 L7	The frequency for performing a Surveillance on AFW valves was extended from 31 days to 18 months.	SR 3.7.4.3	4.8.3	II	Unique with respect to frequency details only.

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time

SECTION 3.7, "PLANT SYSTEMS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.7.6, "Component Cooling Water System," and LCO 3.7.7, Service Water System"					
3.7 L8	Actions required when the specification is not met were changed from a single component basis to a train basis for the Component Cooling Water (CCW) System and the Service Water System (SWS).	LCO 3.7.6 LCO 3.7.7	3.3.3.2, 3.3.3.3, 3.3.4.2, 3.3.4.3	III	LCO stated in terms of Trains rather than components
3.7 L9	The allowed time for one inoperable CCW System or SWS train was extended from 24 to 72 hours.	LCO 3.7.6 LCO 3.7.7	3.3.3.2, 3.3.4.2	IV	Allowed Outage Time Extension from 24 hours to 72 hours

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time

SECTION 3.7, "PLANT SYSTEMS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.7.9, "Control Room Emergency Filtration System (CREFS)," and LCO 3.7.10, "Control Room Emergency Air temperature Control (CREATC)"					
3.7 L10	The requirements for the CREFS and CREATC were reduced to apply only to MODES 1 through 4, movement of irradiated fuel, and CORE ALTERATIONS.	LCO 3.7.9 LCO 3.7.10	3.15.1	I	Unique with respect to details of Applicability.
3.7 L11	An action was added to suspend CORE ALTERATIONS or movement of irradiated fuel (i.e., exit Applicability) rather than place CREFS into emergency mode.	LCO 3.7.9 LCO 3.7.10	3.15.2.a	V	Unique with respect to details of Required Action.

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time

SECTION 3.7, "PLANT SYSTEMS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.7 L12	A requirement was deleted to suspend reduction of Shutdown Margin if both trains of CREFS or CREATC are inoperable.	LCO 3.7.9 LCO 3.7.10	3.15.2.b	None	Unique
3.7 L13	A Surveillance Requirement was relaxed to require that the CREFS be operated for 15 minutes rather than 1 hour.	SR 3.7.9.1	4.15.b	VI	Unique with respect to details of acceptance criterion.
3.7 L14	A Surveillance Requirement was relaxed to no longer verify positive pressure during operational testing of the CREFS.	SR 3.7.9.1	4.15.c	VI	Unique with respect to details of acceptance criterion.

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time

SECTION 3.7, "PLANT SYSTEMS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.7 L15	The frequency for performing a Surveillance was extended from 18 months to 18 months on a Staggered Test Basis	SR 3.7.9.4	4.15.f.4	II	Unique with respect to frequency details only.
3.7 L16	The allowed time that one train of CREATC can be inoperable was extended from 7 days to 30 days.	LCO 3.7.10	3.15.1.a, 3.15.2.a	VII	Unique with respect to Allowed Outage Time details only.
LCO 3.7.11, "Fuel Building Air Cleanup System"					
3.7 L19	An action was added to suspend movement of irradiated fuel assemblies (i.e., exit Applicability) rather than terminate fuel handling operations.	LCO 3.7.11 Required Action A.1	3.8.2	V	Unique with respect to details of Required Action.

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time

SECTION 3.7, "PLANT SYSTEMS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.7.15, "Secondary Specific Activity"					
3.7 L17	The requirements for secondary specific activity were reduced to apply only to MODES 1 through 4 from "all modes of operation from cold shutdown."	LCO 3.7.15	3.4.2	I	Unique with respect to details of Applicability.
3.7 L18	The frequency for performing a Surveillance for secondary specific activity was extended from 72 hours to 31 days	SR 3.7.15.1	Table 4.1-2, Item 8	II	Unique with respect to frequency details only.

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time

SECTION 3.8, "ELECTRICAL POWER SYSTEMS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.8.1, "AC Sources-Operating"					
3.8 L1	The allowed time to declare required features with no offsite power available inoperable when its redundant required feature is inoperable was extended from no allowed time to 12 hours. The allowed time to declare required features supported by the inoperable diesel generator when its redundant required feature is inoperable was extended from no allowed time to 4 hours.	LCO 3.8.1 Required Action A.1 and B.2	1.3	VII	Unique with respect to allowed outage time extension only.

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.8, "ELECTRICAL POWER SYSTEMS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.8 L8	The required time that the diesel generator is tested between 2650 kW and 2750 kW is reduced from two (2) hours to ≥ 1.75 hours.	SR 3.8.1.11	4.6.1.5	None	Unique
LCO 3.8.3, "Diesel Fuel Oil and Starting Air"					
3.8 L2	The time allowed for restoration of fuel oil to within limits is extended from no allowed time to 48 hours.	LCO 3.8.3 Required Action A.1 and B.1	3.7.1	VII	Unique with respect to allowed outage time details only.

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.8, "ELECTRICAL POWER SYSTEMS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.8.4, "DC Sources-Operating"					
3.8 L4	The Surveillance Frequency for verifying battery voltage is ≥ 125.7 volts was extended from daily five days per week to once every 7 days.	SR 3.8.4.1	4.6.5	II	Unique with respect to frequency details only

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.8, "ELECTRICAL POWER SYSTEMS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.8.6, "Battery Cell Parameters"					
3.8 L3	The time allowed for battery cell parameters to not be within Category A and B limits was extended from no time to 31 days when pilot cell electrolyte level and float voltage are verified to meet Category C limits within 1 hour and that battery cell parameters are verified to meet Category C limits within 24 hours and every 7 days thereafter.	LCO 3.8.6 Required Actions A.1, A.2, and A.3	4.6.3	VII	Unique with respect to allowed outage time details only

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.8, "ELECTRICAL POWER SYSTEMS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.8 L6	The Surveillance Frequency for verifying pilot cell voltage and temperature was extended from daily five days per week to once every 7 days.	SR 3.8.6.1	4.6.3	II	Unique with respect to frequency details only
3.8 L7	A surveillance requirement to subject the batteries to an equalizing charge annually was deleted.	LCO 3.8.6	4.6.3	None	Unique
3.8 L10	The Surveillance Frequency for verifying average electrolyte temperature was extended from 5 days per week to once every 92 days.	SR 3.8.6.3	4.6.3	II	Unique with respect to frequency details only

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.8, "ELECTRICAL POWER SYSTEMS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.8 L11	The Surveillance Frequency for verifying battery cell parameters was extended from 31 days to 92 days.	SR 3.8.6.2	4.6.3	II	Unique with respect to frequency details only
LCO 3.8.9, "Electrical Distribution Systems-Operating"					
3.8 L5	The time allowed for restoration of an inoperable AC electrical power distribution system is extended from no allowed time to 8 hours and 16 hours from discovery of failure to meet LCO.	LCO 3.8.9 Required Action A.1	3.7.1	VII	Unique with respect to allowed outage time details only

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.8, "ELECTRICAL POWER SYSTEMS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.8 L9	A requirement to test thermal trip elements of molded case circuit breakers is removed from a surveillance requirement.	SR 3.8.9.2 SR 3.8.9.3	Table 4.1-3, Item 18	None	Unique

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 3.9, "REFUELING OPERATIONS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.9.1, "Boron Concentration"					
3.9 L1	The required frequency for performing the surveillance requirement to verify the boron concentration in the primary coolant during refueling was relaxed from once per shift to once per 72 hours	DR 3.9.1.1	3.8.1	II	Unique with respect to surveillance frequency details only

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC
- IX. Relaxation of LCO Requirement

SECTION 3.9, "REFUELING OPERATIONS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.9.2, "Nuclear Instrumentation"					
3.9 L5	The required actions for the condition when any of the refueling specifications were not met were relaxed to apply only to the condition where both source ranges are inoperable.	LCO 3.9.2 Required Actions A.2, B.1	3.8.1	V	Unique with respect to required action details and applicability

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC
- IX. Relaxation of LCO Requirement

SECTION 3.9, "REFUELING OPERATIONS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.9.3, "Containment Penetrations"					
3.9 L2	The requirements for closure of the containment equipment door were relaxed to require only four (4) bolts in place rather than all bolts in place as previously required.	LCO 3.9.3	3.8.1	IX	Unique with respect to Specification requirements only

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC
- IX. Relaxation of LCO Requirement

SECTION 3.9, "REFUELING OPERATIONS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.9 L9	The requirements for closure of containment penetrations were relaxed from requiring all automatic valves to be operable or have at least one valve in a penetration be closed to at least one manual or automatic valve, blind flange or equivalent being closed.	LCO 3.9.3	3.8.1	IX	Unique with respect to Specification requirements only

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC
- IX. Relaxation of LCO Requirement

SECTION 3.9, "REFUELING OPERATIONS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.9 L7	The required frequency for performing the surveillance requirement to verify the containment purge system was relaxed from prior to refueling operations to 18 months.	LCO 3.9.3	3.8.1	II	Unique with respect to surveillance frequency details only
3.9 L10	The requirements for containment isolation were relaxed to allow containment penetrations to be inoperable during core alterations in the vessel that do not involve fuel assemblies.	LCO 3.9.3 Applicability	3.8.1	I	Unique with respect to applicability details.

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC
- IX. Relaxation of LCO Requirement

SECTION 3.9, "REFUELING OPERATIONS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.9 L8	The requirements for performing a surveillance to verify that each valve in the containment vent and purge system actuates to the correct position were relaxed to permit the surveillance to be met utilizing an actual signal in addition to the currently required simulated signal.	LCO 3.9.3	3.8.1	VI	Unique with respect to surveillance requirement acceptance criteria

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC
- IX. Relaxation of LCO Requirement

SECTION 3.9, "REFUELING OPERATIONS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.9 L3	The requirements for maintaining containment purge penetration system operable when the system is not in operation were relaxed from requiring one valve to be securely closed to requiring both containment isolation valves in the penetration operable	LCO 3.9.3	3.8.1	IX	Unique with respect to Specification requirements only

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC
- IX. Relaxation of LCO Requirement

SECTION 3.9, "REFUELING OPERATIONS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.9 L4	The required actions for the condition when any of the refueling specifications were not met were relaxed to require that core alterations and movement of irradiated fuel be suspended, rather than to suspend all refueling operations as was previously required.	LCO 3.9.3 Required Actions A.1, A.2	3.8.1	V	Unique with respect to required action details

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC
- IX. Relaxation of LCO Requirement

SECTION 3.9, "REFUELING OPERATIONS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.9.4, "RHR and Coolant Circulation-High Water Level"					
3.9 L6	The required actions for the condition when any of the refueling specifications were not met were relaxed to require that core alterations and movement of irradiated fuel be suspended, rather than to suspend all refueling operations as was previously required.	LCO 3.9.4 Required Actions A.1 and A.2	3.8.1	V	Unique with respect to required action details

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC
- IX. Relaxation of LCO Requirement

SECTION 3.9, "REFUELING OPERATIONS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
LCO 3.9.7, "Containment Purge Filter System"					
3.9 L9	Requirements for isolation of a containment purge system penetration when the system is inoperable were relaxed to include additional means of isolation previously not considered. The additional means of isolation are a closed manual or automatic isolation valve, blind flange, or an equivalent method that can provide a temporary atmospheric pressure and ventilation barrier.	LCO 3.9.7 Required Action A.1	3.8.1, 3.8.2	V	Unique with respect to required action details

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC
- IX. Relaxation of LCO Requirement

SECTION 3.9, "REFUELING OPERATIONS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
3.9 L4	The required actions for the condition when any of the refueling specifications were not met were relaxed to require that core alterations and movement of irradiated fuel be suspended, rather than to suspend all refueling operations as was previously required.	LCO 3.9.4 Required Actions A.1 and A.2	3.8.1	V	Unique with respect to required actions that are deleted

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC
- IX. Relaxation of LCO Requirement

SECTION 4.0 "Design Features" MATRIX OF LESS RESTRICTIVE CHANGES

Sheet 1 of 1

Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
4.0 "Design Features"					
4.0 L1	Requirements regarding Design Features for the reactor core were expanded to allow for limited substitution of filler rods and limited use of lead test assemblies	4.2.1	5.3	None	Unique with respect to applicability details

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 5.0, "ADMINISTRATIVE CONTROLS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
Section 5.2, "Organization"					
5.0 L1	The position of qualified radiation control technician was allowed to be vacant for two (2) hours to provide for unexpected absence, provided immediate action is taken to fill the required position.	Section 5.2.2	6.2.3	None	Unique
5.0 L2	The allowance for shift complement to be one less than the minimum requirement for two (2) hours was relaxed to allow that the shift complement can be less than the minimum requirement for two (2) hours.	Section 5.2.2	6.2.3	None	Unique

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
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SECTION 5.0, "ADMINISTRATIVE CONTROLS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
5.0 L3	The requirement that the Manager-Operations shall hold or have held a senior reactor operators license for either HBRSEP or a similar plant and that the Manager-Shift Operations shall hold a senior operator license was relaxed to the Manager-Operations or the Superintendent in charge of Shift Crews shall hold a senior reactor operators license.	Section 5.2.2	6.3.2	None	Unique

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
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- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
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SECTION 5.0, "ADMINISTRATIVE CONTROLS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
Section 5.3, "Unit Staff Qualifications"					
5.0 L4	The qualification requirements for the manager of the radiation protection function were relaxed from referencing Regulatory Guide 1.8, September 1975, to ANSI/ANS 3.1-1981, which relaxes the experience requirement from five (5) years to four (4) years.	5.3.1	6.3.3	None	Unique

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 5.0, "ADMINISTRATIVE CONTROLS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
Section 5.6, "Reporting Requirements"					
5.0 L5	The due date for the Occupational Radiation Exposure Report was relaxed from March 1 to April 30 of each year. The due date for the annual Radiological Environmental Operating Report was relaxed from May 1 to May 15 of each year.	Section 5.6.2	6.9.2.1 6.9.2.3	None	Unique
5.0 L6	A special report required when reactor coolant exceeds specific activity limits was deleted.	Section 5.6	6.9.1.2.1	None	Unique

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 5.0, "ADMINISTRATIVE CONTROLS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
5.0 L7	The requirement for reporting information in the Radiological Effluent Release Report was relaxed from twice per year to once a year.	Section 5.6.3	6.9.1.3	None	Unique
5.0 L8	The due date for the monthly operating report was relaxed from the 10th of the month to the 15th of the month.	Section 5.6.4	6.9.1.4	None	Unique

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
- VIII. Deletion of Requirement for 30 day Special Report to NRC

SECTION 5.0, "ADMINISTRATIVE CONTROLS," MATRIX OF LESS RESTRICTIVE CHANGES

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Discussion of Change	Description	ITS Section	CTS Section	Category	Characterization
5.0 L9	The due date for the steam generator tube inservice inspection report was relaxed from being included in the Operating Report for the period in which the inspection was completed to the Operating Report for the period beginning after the inspection was completed.	Section 5.6.8	4.2.1.3	None	Unique
5.0 L10	The requirement for the Containment Leak Rate Test Report was deleted.	Section 5.6	6.9.3.1	None	Unique

Categories

- I. Relaxation of Applicability.
- II. Relaxation of Surveillance Frequency
- III. LCO stated in terms of Trains rather than components
- IV. Allowed Outage Time Extension from 24 hours to 72 hours
- V. Relaxation of Required Actions
- VI. Relaxation of Surveillance Requirement acceptance criteria
- VII. Relaxation of Allowed Outage Time
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SECTION 1.0 "Use and Application" MATRIX OF MORE RESTRICTIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
1.0 "Use and Application"			
1.1 M1	Definition of \bar{E} was expanded to include weighted average and composition of isotopes excluding iodine instead of average of beta and gamma energy disintegration of the specific activity.	1.1	3.1.4
1.1 M2	Definition for Refueling Operations was expanded to include the time from initial detensioning of the first reactor vessel head closure bolt until the reactor vessel head is unbolted and the time from beginning reinstallation of the first reactor vessel head closure bolt until the reactor vessel head is fully tensioned.	1.1	1.2.6
1.1 M3	Definition for Channel Functional Test was expanded to include specifying the point of test signal injection. The more prescriptive requirement provides for injection of the test signal as close to the sensor as practicable.	1.1	1.6.4

SECTION 2.0 "Safety Limits (SL)" MATRIX OF MORE RESTRICTIVE CHANGES

Sheet 1 of 1

Discussion of Change	Summary of Change	ITS Section	CTS Section
2.0 "Safety Limits (SL)"			
2.0 M1	The requirements for Reactor Core Safety Limit were expanded to apply to MODE 2 and the reactor is subcritical instead of when the reactor is critical.	2.1.1	2.1
2.0 M2	Requirements when Safety Limits are violated were expanded to include restoration of compliance with the Safety Limit within 5 minutes and specifying a time of one hour to place the unit in MODE 3. The requirement to restore compliance with the Safety Limit and the time to place the unit in shutdown were not previously specified.	2.2	6.7

SECTION 3.0, "LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY,"
MATRIX OF MORE RESTRICTIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.0 M1	If a specification cannot be met and there is no specific action to be taken, the time allowed to reach MODE 3 was limited to seven (7) hours, the time allowed to reach MODE 4 was limited to 13 hours, and the time allowed to reach MODE 5 was limited to 37 hours. The previous times allowed were eight (8) hours to reach hot shutdown and 38 hours to reach cold shutdown.	LCO 3.0.3	3.0
3.0 M2	A requirement was added that prohibits entry into a MODE or other specified condition when a specification is not met and the required action for that specification does not permit entry into the MODE. A requirement was added that prohibited entry into a MODE or specified condition unless the surveillance requirements for the specifications applicable to the MODE or specified condition are met.	LCO 3.0.4 SR 3.0.4	3.0 4.0
3.0 M3	For frequencies of surveillance requirements specified as "once," a requirement was added to clarify that an extension of 25% does not apply.	SR 3.0.2	4.0

SECTION 3.1, "REACTIVITY CONTROL SYSTEMS," MATRIX OF MORE RESTRICTIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.1.1, "SHUTDOWN MARGIN (SDM)"			
3.1 M1	A surveillance requirements was added to verify that Shutdown Margin is within the limits of the Core Operating Limits Report (COLR).	SR 3.1.1.1	3.10.8
LCO 3.1.2, "Core Reactivity"			
3.1 M2	A frequency requirement of prior to entering MODE 1 after each refueling and 31 Effective Full Power Days (EFPDs) thereafter was added to the surveillance requirement to compare actual to predicted boron concentration values. Normalization of predicted values was required to be performed prior to exceeding a fuel burnup of 60 EFPDs.	SR 3.1.2.1	4.9
3.1 M3	Requirements were added that the measured core reactivity be within $\pm \Delta k/k$ of predicted values in MODES 1 and 2, and if not met, to reevaluate design and safety analyses and determine that the core is acceptable for continued operation within 72 hours, establish appropriate operating restrictions within 72 hours, or be in MODE 3 in six (6) hours.	LCO 3.1.2	4.9
LCO 3.1.3, "Moderator Temperature Coefficient (MTC)"			
3.1 M4	The requirements for the Moderator Temperature Coefficient (MTC) lower limit were extended to apply to all of MODE 2 and MODE 3, rather than only to reactor critical and power operations as was previously required.	LCO 3.1.3 Applicability	3.1.3.1

SECTION 3.1, "REACTIVITY CONTROL SYSTEMS," MATRIX OF MORE RESTRICTIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.1 M6	Surveillance requirements were added that verify that the MTC is within the upper limit once prior to entering MODE 1 after each refueling and verify that MTC is within the lower limit once each cycle.	SR 3.1.3.1 SR 3.1.3.2	3.1.3
LCO 3.1.4, "Rod Group Alignment Limits"			
3.1 M7	The allowed time to restore a rod to within alignment limits was reduced to one (1) hour from two (2) hours.	LCO 3.1.4 Required Action B.1	3.10.1.5
3.1 M9	Requirements were added for the condition when one rod is not within alignment limits to verify that SDM is within the limits of the COLR or initiate boration to restore SDM to within limit within one (1) hour, verify SDM is within limits of the COLR once per 12 hours, reevaluate the safety analyses and confirm results remain valid for duration of operation within 5 days, or if the requirements for a rod not within alignment limits cannot be met, be in MODE 3 in six (6) hours. Requirements were added for the condition when more than one rod that is not within the alignment limit to verify SDM is within the limits of the COLR within one (1) hour, initiate boration to restore SDM to within limit within one (1) hour, and be in MODE 3 in six (6) hours.	LCO 3.1.4 Required Actions B.2.1.1, B.2.1.2, B.2.3, B.2.6, C.1, D.1.1, D.1.2, and D.2	3.10.1.5
3.1 M8	The allowed time to measure the hot channel factors when a rod is not within alignment limits was limited to 72 hours. No time limit previously existed.	LCO 3.1.4 Required Actions B.2.4 and B.2.5	3.10.1.5
3.1 M28	The requirements for rod group alignment limits were made specifically applicable to MODES 1 and 2. No specific reactor condition applied to the rod group alignment limits previously.	LCO 3.1.4 Applicability	3.10.1.5

SECTION 3.1, "REACTIVITY CONTROL SYSTEMS," MATRIX OF MORE RESTRICTIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.1 M24	A requirement to measure the rod drop time from the point of decay of the stationary gripper coil voltage rather than the beginning of rod motion during the rod drop test. The effect of this change is to slightly decrease the allowed rod drop time.	SR 3.1.4.3	3.10.4.1
3.1 M29	A requirement was added to the rod drop time surveillance test to measure the time from the fully withdrawn position. No position was previously specified.	SR 3.1.4.3	3.10.4.1
3.1 M26	Requirements were added for the condition when control rod drop times are not within limits to verify SDM is within the limits provided in the COLR within one (1) hour, initiate boration to restore SDM to within the limit within one (1) hour, and the time allowed to reach MODE 3 was limited to six (6) hours rather than eight (8) hours as was previously required.	LCO 3.1.4 Required Actions A.1.1, A.1.2, and A.2	3.10.4.1
3.1 M10	A requirement that allowed continuous operation with one control rod inoperable was deleted.	LCO 3.1.4	3.10.6.2
3.1 M25	Requirements were added for the condition when one or more control rods cannot be moved by its mechanism to restore SDM or verify SDM is within limits within one (1) hour. No completion time previously existed. For the same condition, the time allowed to reach MODE 3 was limited to six (6) hours rather than eight (8) hours as was previously required.	LCO 3.1.4	3.10.6.3
3.1 M11	A requirements was added to the rod exercise test to move control rods at least ten (10) steps during the test. No movement criterion was previously specified.	SR 3.1.4.2	Table 4.1-3 Item 2

SECTION 3.1, "REACTIVITY CONTROL SYSTEMS," MATRIX OF MORE RESTRICTIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.1 M12	A surveillance requirement was added to verify individual rod positions are within alignment limit every 12 hours.	SR 3.1.4.1	Table 4.1-3
LCO 3.1.5, "Shutdown Bank Insertion Limits"			
3.1 M13	Requirements for the shutdown bank insertion limits were extended to apply to MODES 1 and 2 with any control bank not fully inserted, rather than to reactor critical and power operations.	LCO 3.1.5 Applicability	3.1.5
3.1 M14	Requirements were added for the condition where one or both shutdown banks are not within limits to verify SDM is within the limits in the COLR within one (1) hour or initiate boration to restore SDM to within limits within one (1) hour, and to restore shutdown banks to within limits in two (2) hours. The time allowed to reach MODE 3 with one or more shutdown banks not within limits was limited to six (6) hours rather than eight (8) hours as previously required.	LCO 3.1.5 Required Actions A.1.1, A.1.2, A.2, and B.1	3.10.1
3.1 M15	A surveillance requirement to verify each shutdown bank is within limits specified in the COLR every 12 hours was added.	SR 3.1.5.1	3.10.1
LCO 3.1.6, "Control Bank Insertion Limits"			
3.1 M16	Requirements to maintain control rods within insertion, sequence and overlap limits specified in the COLR were added.	LCO 3.1.6	3.10.1.3

SECTION 3.1, "REACTIVITY CONTROL SYSTEMS," MATRIX OF MORE RESTRICTIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.1 M17	Requirements were added for the condition when control bank insertion limits are not met to verify SDM is within the limits of the COLR within one (1) hour, initiate boration to restore SDM within one (1) hour, and restore control banks within limits within one (1) hours. Similarly, requirements were added for the condition when control bank sequence or overlap limits are not met to verify SDM is within the limits of the COLR within one (1) hour, initiate boration to restore SDM within one (1) hour, and restore control banks within limits within two (2) hours.	LCO 3.1.6 Required Actions A.1.1, A.1.2, B.1.1, B.1.2, B.2.2, and B.2.3	3.10.1
3.1 M18	Surveillance requirements were added to verify that estimated critical control bank position is within limits specified in the COLR within four (4) hours prior to achieving criticality, each control bank insertion is within the limits specified in the COLR every 12 hours, and sequence and overlap limits specified in the COLR are met for control banks not fully inserted in the core every 12 hours.	SR 3.1.6.1 SR 3.1.6.2 SR 3.1.6.3	3.10.1

SECTION 3.1, "REACTIVITY CONTROL SYSTEMS," MATRIX OF MORE RESTRICTIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.1.7, "Rod Position Indication"			
3.1 M27	A requirement was added to perform the surveillance requirement to compare analog rod position indication and bank demand position indication once within four (4) hours following rod motion in excess of six (6) inches when the rod position deviation monitor is inoperable.	SR 3.1.7.1	Table 4.1-1 Items 9 and 10
LCO 3.1.8, "Physics Test Exceptions-MODE 2"			
3.1 M20	Requirements were added for the condition that the SDM is not within limits during physics tests to initiate boration to restore SDM to within limit within 15 minutes, and to suspend physics tests within one (1) hours. A requirement was added for the condition that the thermal power is not less than or equal to 5% rated thermal power to immediately open the reactor trip breakers. A requirement was added for the condition that the lowest Reactor Coolant System (RCS) loop average temperature is not within limit to restore the RCS lowest average loop temperature to within limit within 15 minutes or be in MODE 3 within 15 minutes.	LCO 3.1.8 Required Actions A.1, A.2, B.1, C.1, and D.1	3.10.1
3.1 M21	Surveillance requirements were added during physics tests to perform a channel calibration on power range and intermediate range channels within 7 days prior to initiation of physics tests, to verify the RCS lowest loop average temperature is $\geq 530^{\circ}\text{F}$ every 30 minutes, verify thermal power is $\leq 530^{\circ}\text{F}$ 5% rated thermal power every 30 minutes, and to verify that SDM is within the limits of the COLR every 24 hours.	SR 3.1.8.1 SR 3.1.8.2 SR 3.1.8.3 SR 3.1.8.4	3.10.1

SECTION 3.1, "REACTIVITY CONTROL SYSTEMS," MATRIX OF MORE RESTRICTIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.1 M22	Requirements were added to maintain Reactor Coolant System loop average temperature $\geq 530^{\circ}\text{F}$, shutdown margin within limits and thermal power $\leq 5\%$ rated thermal power while performing physics tests. These requirements did not exist previously.	LCO 3.1.8	3.10.1
3.1 M23	An allowance for the SDM not to meet the limits in the COLR during physics tests while measuring control rod worth and SDM was deleted.	LCO 3.1.8	3.10.1.6
3.1 M30	The requirements for the rod position deviation monitor were extended to apply to MODES 1 and 2 rather than only to reactor critical as was previously required.	LCO 3.1.4	Table 3.5-2 Item 15a

SECTION 3.2, "REACTIVITY CONTROL SYSTEMS," MATRIX OF MORE RESTRICTIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.2.1, "Heat Flux Hot Channel Factor"			
3.2 M1	An exception from meeting heat flux hot channel factor limits during physics tests was deleted.	LCO 3.2.1	3.10.3.1
3.2 M2	Requirements were added for the condition when the heat flux hot channel factor is not within limits to reduce the power range high neutron flux setpoint by $\geq 1\%$ for each 1% that the factor exceeds the limit within 72 hours, and to verify that heat flux hot channel factor is within limits prior to increasing thermal power above the required action value. The allowed time to reach MODE 2 if the requirements for heat flux hot channel factor outside of limits cannot be met was limited to six (6) hours instead of eight (8) hours as previously required.	LCO 3.2.1 Required Actions A.2.2, A.2.4, B.1	3.10.2.1
3.2 M3	Requirements were added to verify that the heat flux hot channel factor is within limit once after each refueling outage prior to exceeding 75% rated thermal power, and once within 12 hours after achieving equilibrium conditions after exceeding by $\geq 10\%$ rated thermal power the thermal power at which the heat flux hot channel was last determined.	SR 3.2.1.1	3.10.2.1.1
3.2 M28	An allowance to not reduce the overpower and overtemperature ΔT setpoints "...if subsequent incore mapping ..." demonstrate that the hot channel factors are not met is deleted.	LCO 3.2.1 Required Action A.2.3	3.10.2.1.1
3.2 M4	A requirement was added to reduce the AFD target band limits to restore the heat flux hot channel factor to within limits within 15 minutes was added.	LCO 3.2.1 Required Action A.1	3.10.2.2.1

SECTION 3.2, "REACTIVITY CONTROL SYSTEMS," MATRIX OF MORE RESTRICTIVE CHANGES

Sheet 2 of 6

Discussion of Change	Summary of Change	ITS Section	CTS Section
3.2 M5	A time limit of 30 minutes was imposed upon the requirement to reduce thermal power when the heat flux hot channel factor exceeds the limits specified in the Core Operating Limits Report (COLR).	LCO 3.2.1 Required Action A.2.1	3.10.2.2.1
3.2 M6	An allowance to raise thermal power above the thermal power limits specified when the heat flux hot channel factor is not within limits by utilization of the Axial Power Distribution Monitoring System (APDMS) was deleted. Requirements for the APDMS that, when in operation, permit less restrictive thermal power limits were deleted.	LCO 3.2.1	3.10.2.2.1 3.10.2.2.2 4.11
LCO 3.2.2, "Nuclear Enthalpy Rise hot Channel Factor"			
3.2 M7	An exception from meeting nuclear enthalpy rise hot channel factor limits during physics tests was deleted.	LCO 3.2.2	3.10.2.1
3.2 M8	A requirements was added to the surveillance to verify the nuclear enthalpy rise hot channel factor is within limits to perform the surveillance once after each refueling outage prior to thermal power exceeding 75% rated thermal power. No power limit previously existed.	SR 3.2.2.1	3.10.2.1.1
3.2 M9	The allowed time for reducing thermal power and the high neutron flux setpoints when the nuclear enthalpy rise hot channel factor exceeds limits was limited to four (4) hours and 72 hours, respectively. No time limits existed previously.	LCO 3.2.2 Required Action A.1.1, A.1.2.1, and A.1.2.2	3.10.2.1.1

SECTION 3.2, "REACTIVITY CONTROL SYSTEMS," MATRIX OF MORE RESTRICTIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.2 M10	The requirements for reducing thermal power and the high neutron flux setpoints by a fraction relating to the degree to which the nuclear enthalpy rise hot channel factor exceeds limits was changed to a requirement to reduce power to less than 50% rated thermal power and to reduce the high neutron flux setpoints to $\leq 55\%$ rated thermal power.	LCO 3.2.2 Required Action A.1.2.1 and A.1.2.2	3.10.2.1.1
3.2 M11	Requirements were added for when the nuclear enthalpy hot channel factor exceeds limits to verify the heat flux hot channel factor is within limits within 24 hours, verify the nuclear enthalpy rise hot channel factor is within limits prior to thermal power exceeding 50% rated thermal power and prior to thermal power exceeding 75% rated thermal power and 24 hours after thermal power reaches $\geq 95\%$ rated thermal power, and if the requirements to restore nuclear enthalpy rise hot channel factor cannot be met, to be in MODE 2 in six (6) hours.	LCO 3.2.2 Required Action A.2, A.3, and B.1	3.10.2.1.1
3.2 M12	A requirement was added to a surveillance note to reverify that the heat flux hot channel factor is within limits in the event that the nuclear enthalpy rise hot channel factor shows and increasing trend.	SR 3.2.2.1	3.10.2.2.3
LCO 3.2.3, "Axial Flux Difference (AFD) (PDC-3 Axial offset Control Methodology)			
3.2 M13	A time limit of once within 31 Effective Full Power Days (EFPDs) after each refueling was imposed on the requirement to determine the target flux difference of each operable excore channel.	SR 3.2.3.3	3.10.2.3
3.2 M14	An exception from meeting axial flux difference requirements during physics tests was deleted.	LCO 3.2.3	3.10.2.5

SECTION 3.2, "REACTIVITY CONTROL SYSTEMS," MATRIX OF MORE RESTRICTIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.2 M15	A requirement maintain axial flux difference within acceptable operation limits specified in the COLR was added.	LCO 3.2.3	3.10.2.5
3.2 M16	The requirements for axial flux difference were extended to apply to MODE 1 with thermal power greater than 15% rated thermal power, rather than to greater than 50% rated thermal power as previously required.	LCO 3.2.3 Applicability	3.10.2
3.2 M17	The time allowed to reduce thermal power to less than 90% rated thermal power or 0.9 Allowable Power Level (APL) whichever is less was limited to 15 minutes. No time requirement previously existed.	LCO 3.2.3 Required Action B.1	3.10.2.6
3.2 M18	A requirement to reduce thermal power to less than 15 % rated thermal power within nine (9) hours was added for the condition when requirements to reduce thermal power or restore cumulative penalty deviation time to less than one (1) are not met. A surveillance requirement to verify that axial flux difference is within limits for each excore channel every seven (7) days was added.	LCO 3.2.3 Required Action D.1 SR 3.2.3.1	3.10.2
3.2 M19	The requirements for the accumulation of penalty deviation time were extended to apply to greater than or equal to 50% rated thermal power rather than greater than 50% rated thermal power as previously required.	LCO 3.2.3	3.10.2.8
3.2 M20	A requirement was added to log axial flux difference once within 15 minutes and every 15 minutes thereafter when the axial flux difference alarms are out of service and the reactor is \geq 90% rated thermal power or 0.9 APL.	SR 3.2.3.2	3.10.2.10

SECTION 3.2, "REACTIVITY CONTROL SYSTEMS," MATRIX OF MORE RESTRICTIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.2 M21	The time allowed after refueling to perform the surveillance requirement to determine the target flux difference of each excore channel was limited to 31 EFPDs. No time limit existed previously.	SR 3.2.3.3	3.10.2.1.1
LCO 3.2.4, "Quadrant Power Tilt Ratio"			
3.2 M22	An exception from meeting Quadrant Power Tilt Ratio (QPTR) requirements during physics tests was deleted.	LCO 3.2.4	3.10.3.1
3.2 M23	An allowed time to restore QPTR to within limits without taking any other actions was eliminated.	LCO 3.2.4	3.10.3.1
3.2 M24	The time allowed to reduce thermal power when QPTR is in excess of limits was limited to two (2) hours. No time limit previously existed.	LCO 3.2.4 Required Actions A.1	3.10.3.1
3.2 M25	The required power reduction when QPTR exceeds limits was increased from two (2) percent for each percent that QPTR exceeds 1.02 to three (3) percent for each percent that QPTR exceeds 1.02.	LCO 3.2.4 Required Action a.1	3.10.3.1

SECTION 3.2, "REACTIVITY CONTROL SYSTEMS," MATRIX OF MORE RESTRICTIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.2 M26	Requirements were added where none existed previously as follows. The QPTR is required to be ≤ 1.02 . If QPTR is not within the limit, the QPTR is required to be determined once per 12 hours and thermal power further reduced by $\geq 3\%$ for each 1% that QPTR is greater than 1.00, the hot channel factors are required to be verified within limits within 24 hours and once per seven (7) days thereafter, the safety analyses are required to be reevaluated for continuous operation prior to increasing thermal power above the restricted levels, the excore detectors are required to be normalized to show zero QPTR prior to increasing power above the restricted levels, and the hot channel factors are required to be verified within limits within 24 hours of reaching rated thermal power or within 48 hours of increasing thermal power above the restricted levels. Surveillance requirements were added to verify that QPTR is within the limit by calculation every seven (7) days and once within 12 hours and every 12 hours thereafter when the QPTR alarm is out of service and to verify QPTR is within the limit by using the incore detectors once within 12 hours and every 12 hours thereafter when one or more power range neutron flux channels are inoperable and thermal power is $\geq 75\%$ rated thermal power.	LCO 3.2.4 Required Actions A.2, A.3, A.4, A.5, and A.6 SR 3.2.4.1 SR 3.2.4.2	3.10.3
3.2 M27	Requirements were added for the surveillance requirement in the condition when one excore detector is out of service, that the remaining three excore detectors may be used to calculate QPTR if reactor power is less than 75% rated thermal power. No power restriction previously applied.	SR 3.2.4.1	1.8

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Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.3.1, "RPS Instrumentation"			
3.3 M1	Trip setpoints have been specified in accordance with the licensee setpoint methodology procedure. The setpoints are more restrictive.	LCO 3.3.1 Table 3.3.1-1 Functions 2, 3, 4.a, 4.b, 5, 6, 7, 8, 9, 11, 12, 13, 14, 15 & 17	2.3.1.2 2.3.1.3
3.3 M2	The allowed time for an inoperable channel was restricted immediately where no allowed time was previously specified.	LCO 3.3.1 Required Actions A and I	3.5.1.5
3.3 M3	When the required number of source range monitors cannot be met, requirements were added to suspend activities involving positive reactivity addition immediately, and to close unborated water source isolation valves in one (1) hour.	LCO 3.3.1 Required Action L	Table 3.5-2 ACTION 5
3.3 M4	The allowed time before the unit must be shut down when an inoperable channel is not placed in trip was reduced from eight (8) hours to six (6) hours.	LCO 3.3.1 Required Action E	3.0
3.3 M6	A requirement was added to reach MODE 3 in 12 hours for an inoperable excore channel.	LCO 3.3.1 Required Action E	Table 3.5-2 Table Notation ACTION 2.b
3.3 M7	Requirements were added to require the unit be placed within either the range of the source range instrumentation or the power range instrumentation within two (2) hours.	LCO 3.3.1 Required Action F	Table 3.5-2 ACTION 3.b

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.3 M8	The allowed time to restore an inoperable channel of automatic trip logic to OPERABLE status was restricted to six (6) hours from 12 hours and if not restored, the allowed time to reach MODE 3 was restricted to six (6) hours from eight (8) hours. The allowed time to restore an inoperable reactor trip breakers (RTBs) to OPERABLE status was reduced from 12 hours to one (1) hour and if not restored, the allowed time was reduced from eight (8) hours to six (6) hours to place the unit in MODE 3.	LCO 3.3.1 Required Action Q and R	3.10.5.2
3.3 M9	The requirements for the reactor protection system (RPS) were increased to include the RTBs, RTB UV & shunt trip mechanisms and Automatic Trip functions in MODES 3, 4 and 5 including associated requirements when the RTBs are closed with either rods not fully inserted, or rod control system capable of rod withdrawal.	LCO 3.3.1 Required Action C & V; Table 3.3.1-1 Functions 18, 19 & 20	3.10
3.3 M10	The allowed times when the RTB trip mechanism is inoperable were limited to require the unit be placed in MODE 3 in 54 hours and RTB opened within 55 hours instead of hot shutdown within 56 hours.	LCO 3.3.1 Required Action U	3.10.5.3
3.3 M11	Requirements were added for two inoperable source range instruments; one inoperable P-6 or P-10 interlock; one inoperable P-7, P-8 and turbine impulse pressure interlock; and two inoperable RPS trains	LCO 3.3.1 Required Actions J, S, T and V	3.10
3.3 M12	Allowable Values were established that are more restrictive than the current technical specifications for RPS Instrumentation, ESFAS Instrumentation and AFW System Instrumentation in accordance with the company setpoint methodology.	LCO 3.3.1 Table 3.3.1-1	3.10

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.3 M13	Requirements added for reactor coolant pump breaker position (single loop and two loops); safety injection input from ESFAS; and RPS interlocks for intermediate range neutron flux, P-7, P-8, P-10 and turbine impulse pressure.	Table 3.3-1 Functions 10, 16 & 17	3.10
3.3 M14	Surveillance requirements were added requiring comparison of incore measurement results to NIS axial flux difference and calibration of the excore nuclear instrument channels to agree with OT Δ T and OP Δ T functions. Surveillance requirements were added requiring CHANNEL CHECKS, Channel Operational Tests (COTs) and CHANNEL CALIBRATION for the Power Range Neutron Flux-Low function. Surveillance requirements were added requiring a TADOT for the Reactor Coolant Pump (RCP) breaker position, Safety Injection (SI) input from ESFAS functions and the RPS P-7 interlock. Surveillance requirements were added requiring a COT for the RPS interlock function P-6, P-8 and P-10 functions.	SR 3.3.1.3 SR 3.3.1.6 SR 3.3.1.1 SR 3.3.1.1 SR 3.3.1.8 SR 3.3.1.11 SR 3.3.1.14 SR 3.3.1.13	Table 4.1-1
3.3 M15	Surveillance Frequency requirements were added for a COT of the Nuclear Intermediate Range and Nuclear source range instrumentation to include within four (4) hours after reducing power below P-10, within four (4) hours after reducing power below P-6 if the COT has not been performed in the previous 92 days, and every 92 days thereafter.	SR 3.3.1.8	Table 4.1-1 Items 2 and 3
3.3 M16	A surveillance requirement was added to perform a CHANNEL CALIBRATION for the Nuclear Intermediate Range and Nuclear Source Range instruments every 18 months.	SR 3.3.1.11	Table 4.1-1 Items 2 and 3

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.3 M17	Surveillance requirements were added to perform a TADOT for the Turbine Trip Logic prior to startup if not performed in the previous 31 days and a CHANNEL CALIBRATION every 18 months.	SR 3.3.1.15 SR 3.3.1.10	Table 4.1-1 Item 22
3.3 M18	Surveillance requirements were extended to apply to MODES 1, 2, 3, 4, and 5 when the RTBs are closed for performance of an ACTUATION LOGIC TEST every 31 days on a staggered test basis. The previous requirement required a similar surveillance during hot shutdown and power operation only.	SR 3.3.1.5	Table 4.1-1 Item 27
3.3 M19	Surveillance requirements were extended to apply to MODES 1, 2, 3, 4, and 5 when the RTBs are closed for performance of an ACTUATION LOGIC TEST every 31 days on a staggered test basis. The previous requirement required a similar surveillance prior to startup when not tested in the previous month.	SR 3.3.1.5	Table 4.1-1 Item 27
3.3 M20	Trip setpoint values were added for intermediate range neutron flux, source range neutron flux, steam generator water level and turbine trip (low oil pressure and turbine stop valve closure).	LCO 3.3.1 Table 3.3.1-1 Function 3, 4, 14 and 15.	2.3.1
3.3 M21	Surveillance requirements were added to perform a CHANNEL CHECK for Steam/Feedwater Flow Mismatch and Low Steam Generator Level.	SR 3.3.1.1	Table 4.1-1 Items 39 and 40
3.3 M49	The allowed time to place the plant in MODE 3 was reduced from eight (8) hours to immediately open the RTBs.	LCO 3.3.1 Required Action J.1	Table 3.5-2

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.3 M53	A requirement was added to perform an actuation logic test for the actuation logic inputs from the source range instrumentation within 4 hours of achieving MODE 3 from MODE 2.	SR 3.3.1.5	Table 4.1-1
3.3 M50	The requirements for Reactor Coolant Flow - Low, single loop, trip were extended to apply to the range of MODE 1 power operation between the P-8 setpoint at approximately 40% rated thermal power (RTP) and 45% RTP.	LCO 3.3.1 Table 3.3.1-1 Function 9. Footnote (g)	Table 3.5-2 Function 10A
LCO 3.3.2, "ESFAS Instrumentation"			
3.3 M1	Trip setpoints have been specified in accordance with the licensee setpoint methodology procedure. The setpoints are more restrictive.	LCO 3.3.2 Table 3.3.2-1 Functions 1.c, 1.d, 1.e, 1.f, 1.g, 2.c, 3.b.3, 4.c, 4.d, 4.e & 6	Table 3.5-1 Items 1, 2, 3, 4, and 5
3.3 M2	The allowed time for an inoperable channel was restricted immediately where no allowed time was previously specified.	LCO 3.3.2 Required Action A	3.5.1.5
3.3 M12	Allowable Values were established that are more restrictive than the current technical specifications for RPS Instrumentation, ESFAS Instrumentation and AFW System Instrumentation in accordance with the company setpoint methodology.	LCO 3.3.2 Table 3.3.2-1	N/A

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.3 M19	Surveillance requirements were extended to apply to MODES 1, 2, 3, and in one case MODE 4 for performance of an ACTUATION LOGIC TEST every 31 days on a staggered test basis. The previous requirement required a similar surveillance prior to startup when not tested in the previous month.	SR 3.3.2.2	Table 4.1-1 Item 27
3.3 M22	The allowed time to reach MODE 3 was limited to six (6) hours rather than eight (8) hours as was previously required for an inoperable channel or train of the manual SI actuation function and the Manual Containment Phase A isolation function.	LCO 3.3.2 Required Action B	Table 3.5-3 ACTION 11
3.3 M23	The allowed time to reach MODE 3 was limited to six (6) hours rather than eight (8) hours and to reach MODE 5 was limited to 36 hours rather than 38 hours for inoperable channels in which the time to place the channel in trip cannot be met.	LCO 3.3.2 Required Actions C, D, E, and G	Table 3.5.3 ACTION 12
3.3 M24	The allowed time to reach MODE 3 was limited to seven (7) hours rather than eight (8) hours and to reach MODE 5 was limited to 37 hours rather than 38 hours for an inoperable manual initiation channel in which the time to restore the channel to operable status cannot be met.	LCO 3.3.2 Required Action I	Table 3.5-3 Item 2.a

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.3 M25	The allowed time to reach MODE 3 was limited to six (6) hours rather than 24 hours plus the time required to bring the plant to hot shutdown utilizing normal operating procedures when a channel of main steam line isolation is not restored to OPERABLE status in the required time period. The allowed time to reach MODE 4 was limited to 60 hours rather than 72 hours when a channel of main steam line isolation is not restored to OPERABLE status in the required time period.	LCO 3.3.2 Required Action F	Table 3.5-4 Item 2.d
3.3 M26	The allowed time between surveillances for the containment isolation trip function were limited to 18 months rather than refueling interval. The length of time between refueling intervals was not specified in the previous requirements.	SR 3.3.2.6	Table 4.1-3 Item 5
3.3 M27	Requirements were added for one inoperable channel of Pressurizer Pressure-Low and T_{avg} -Low interlock to verify the interlocks are in required state. Surveillance requirements were added to perform a CHANNEL CHECK, MASTER RELAY TEST, SLAVE RELAY TEST and CHANNEL CALIBRATION on ESFAS instrumentation. Requirements added for the setpoints for ESFAS interlocks which did not exist previously.	LCO 3.3.2 Required Action H SR 3.3.2.1 SR 3.3.2.3 SR 3.3.2.4 SR 3.3.2.5 SR 3.3.2.7 Table 3.3.2-1 Item 6	Table 3.5-4
3.3 M52	The allowed time between performance of a CHANNEL CHECK surveillance for containment pressure was reduced from 24 hours to 12 hours.	LCO 3.3.2 Table 3.3.2-1 Functions 1.c, 2.c, 3.a(3), 3.b(3), 4.c	Table 4.1-1 Item 18

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Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.3.3, "PAM Instrumentation"			
3.3 M28	The requirements for Post Accident Monitoring (PAM) Instrumentation were extended to apply to MODES 1, 2, 3, rather than during power operations.	LCO 3.3.3	3.5.1.2
3.3 M31	The allowed time to restore inoperable containment hydrogen channel to OPERABLE status was limited to 72 hours rather than 14 days as was previously required.	LCO 3.3.3 Required Action E	Table 3.3-5 Note 6
3.3 M32	Requirements were added for additional PAM functions of Steam generator Pressure and Level, Containment Spray Additive Tank Level, Containment Isolation Valve Position, Power Range and Source Range Neutron Flux, RCS pressure, Hot and Cold leg temperature, Refueling Water Storage tank and Condensate Storage tank level.	LCO 3.3.3 Table 3.3.3-1	N/A
3.3 M33	The allowed time to reach MODE 3 was reduced to six (6) hours and MODE 4 to 12 hours from 12 hours and 42 hours, respectively, when a thermocouple is not restored to OPERABLE status in the required time period.	LCO 3.3.3 Required Action G	Table 3.5-5 Note 8
3.3 M47	The allowed outage time for one inoperable channel of containment hydrogen monitors was limited to 30 days rather than allow continuous operation with one channel out of service.	Table 3.3.3-1 Item 11	Table 3.5-5 Function 11
LCO 3.3.4, "Remote Shutdown System"			
3.3 M35	Requirements were added for the Remote Shutdown System. No requirements existed previously.	LCO 3.3.4	Table 4.1-1

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Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.3.5, "LOP DG Start Instrumentation"			
3.3 M36	The requirements for loss of voltage and degraded voltage instrumentation were extended to apply to MODES 1, 2, 3, and 4 rather than reactor critical.	LCO 3.3.5	Table 3.5-3 Items 3A and 3B
3.3 M37	A requirement was added to restore all but one degraded voltage channel to OPERABLE status within one (1) hour if two or more channels are inoperable.	LCO 3.3.5 Required Action C	Table 3.5-3
LCO 3.3.6, "Containment Ventilation Isolation Instrumentation"			
3.3 M38	A requirement was added to enter applicable requirements for an inoperable containment penetration when one or more functions or radiation monitoring channels of the containment ventilation isolation instrumentation system is inoperable.	LCO 3.3.6 Required Action A.2	Table 3.5-4 ACTION 15
3.3 M40	The requirements for Containment Ventilation Isolation Instrumentation were extended to apply to core alterations or during movement of irradiated fuel assemblies inside containment.	LCO 3.3.6 Table 3.3.6-1	3.5.1.4 Table 3.5-4 Items c.i and c.ii
3.3 M41	Surveillance Requirements were added for the Automatic Actuation Logic and Actuation relays function including associated surveillance requirements for a ACTUATION LOGIC TEST, MASTER RELAY TEST and SLAVE RELAY TEST.	LCO 3.3.6 Table 3.3.6-1 Function 2 SR 3.3.6.1 SR 3.3.6.3 SR 3.3.6.5	Table 3.5-4
3.3 M42	Surveillance requirements were added to perform a CHANNEL CHECK, COT, TADOT and CHANNEL CALIBRATION for the containment ventilation isolation system.	SR 3.6.6.1 SR 3.6.6.4 SR 3.6.6.6 & Note SR 3.6.6.7	3.8

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Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.3.7, "CREFS Actuation Instrumentation"			
3.3 M43	Requirements were added for the CREFS Actuation Instrumentation System. No requirements existed previously.	LCO 3.3.7	3.5
LCO 3.3.8, "AFW System Instrumentation"			
3.3 M12	Allowable Values were established that are more restrictive than the current technical specifications for RPS Instrumentation, ESFAS Instrumentation and AFW System Instrumentation in accordance with the company setpoint methodology.	LCO 3.3.8 Table 3.3.8-1	Table 3.4-2
3.3 M44	A completion time to reach MODE 3 was imposed of six (6) hours and a requirement was added to reach MODE 4 was imposed of 12 hours rather than no specified times for either MODE, when AFW pump start instrumentation is not restored to OPERABLE status within required time of 48 hours.	LCO 3.3.8 Required Action D	Table 3.4-1 Note 2
3.3 M48	The completion time to reach MODE 3 was reduced to six (6) hours from eight (8) hours and a requirement was added to reach MODE 4 in 12 hours when AFW undervoltage channel instrumentation is not restored to OPERABLE status within required time of 48 hours.	LCO 3.3.8 Required Action B	Table 3.4-1 Note 1
3.3 M51	The allowance for one channel of steam generator water low low level to be inoperable continuously was eliminated and an allowed outage time of for one inoperable channel was imposed.	LCO 3.3.8 Table 3.3.8-1 Function 1	Table 3.4-1 Item 1

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Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.4.1, "RCS Pressure, Temperature, and Flow Departure from Nucleate Boiling (DNB) Limits"			
3.4 M1	A new specification for Reactor Coolant System (RCS) pressure, temperature and flow to be within limits was added. No requirements for these values previously existed.	LCO 3.4.1	3.1
LCO 3.4.2, "RCS Minimum Temperature for Criticality"			
3.4 M2	The allowed minimum temperature for criticality was limited to greater than or equal to 530°F. Lower temperature values for minimum temperature for criticality were previously allowed.	LCO 3.4.2	3.1.3.2
3.4 M3	The time required to reach subcritical conditions when the reactor is critical and the minimum temperature for criticality was not met was restricted to 30 minutes from the previous requirement of 8 hours. A surveillance requirement to verify that the minimum temperature for criticality is met was added.	LCO 3.4.2 Required Action A.1	3.1.3.2

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.4 M4	Requirements were added for failure to meet RCS Pressure, RCS Temperature, and RCS Heatup and Cooldown rate limits to restore parameters to within limits in 30 minutes, to determine if the RCS is acceptable for continued operation, to bring the unit to MODE 3 in 6 hours and MODE 5 with RCS pressure less than 400 psig in 36 hours if completion times are not met, and to restore parameters to within limits immediately and determine if the RCS is acceptable for continued operation prior to entering MODE 4 when the unit is not in MODES 1, 2, 3, or 4. A surveillance requirement was added to verify that RCS pressure, RCS temperature, and RCS heatup and cooldown rates are within limits every 30 minutes during RCS heatup, RCS cooldown and RCS inservice and hydrostatic testing.	LCO 3.4.3 Required Actions A.1, A.2, B.1, B.2, C.1, and C.2 SR 3.4.3.1	3.1.2.1
LCO 3.4.4, "RCS Loops-MODES 1 and 2			
3.4 M5	The requirements for maintaining three RCS loops operable and in operation were extended to apply to MODES 1 and 2, rather than only to power operation as previously existed.	LCO 3.4.4, Applicability	3.1.1.1 3.3.1.1
3.4 M6	The time requirement to bring the unit to MODE 3 was reduced to 6 hours from 8 hours and a surveillance requirement to verify that each RCS loop is in operation every 12 hours was added.	LCO 3.4.4 Required Action A.1 SR 3.4.4.1	3.1.1.1
3.4 M7	The requirements for maintaining two RCS loops operable and in operation were extended to apply to MODE 3, rather than only to reactor power greater than or equal to 2% rated thermal power.	LCO 3.4.4 Applicability	3.1.1.1

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Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.4.5, "RCS Loops-MODE 3" LCO 3.4.6, "RCS Loops-MODE 4" LCO 3.4.7, "RCS Loops-MODE 5, Loops Filled" LCO 3.4.8, "RCS Loops-MODE 5, Loops Not Filled"			
3.4 M8	Requirements are added to de-energize all control rod drive mechanisms immediately, suspend all operations involving a reduction of RCS boron concentration immediately, and initiate action to restore one RCS loop to operable status and operation immediately. Surveillance requirements are added to verify required RCS loops in operation, verify that steam generator secondary side water levels are $\geq 16\%$, verify that the rod control system is not capable of rod withdrawal when required, verify that the reactor trip breakers are open when required, and verify that the lift disconnect switches are open for all control rods not fully withdrawn when required, all every 12 hours.	LCO 3.4.5 Required Action D.1, D.2, D.3 SR 3.4.5.1 SR 3.4.5.2 SR 3.4.5.3 SR 3.4.5.4 SR 3.4.5.5 SR 3.4.5.6 SR 3.4.5.7	3.1.1.1
3.4 M38	A NOTE is added to the specifications that restricts operation with less than two RCS Loops in operation under certain conditions to a maximum of 1 hour.	LCO 3.4.5 NOTE LCO 3.4.6 NOTE 1 LCO 3.4.7 NOTE 1	3.1.1.1
3.4 M36	The requirement for two steam generators to be operable in MODE 3 is extended to apply to two RCS Loops which includes two Reactor Coolant Pumps (RCPs).	LCO 3.4.5	3.1.1.2
3.4 M9	The requirements for one RCS loops or RHR trains were restricted to apply only to MODE 4 rather than for RCS temperature $\geq 200^\circ\text{F}$ and reactor power less than 2% rated thermal power as was previously required.	LCO 3.4.6, Applicability	3.1.1.1

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.4 M10	The requirements for operable RCS loops and/or RHR trains in MODE 4 were extended to apply to two loops or trains, rather than to one RCS loop or RHR train as was previously required.	LCO 3.4.6	3.1.1.1
3.4 M11	A requirement was added to initiate action immediately to restore a second RCS loop or RHR train to operable status if one required loop or train is inoperable and one RCS loop is operable. A requirement was added to be in MODE 5 in 24 hours if one required loop or train is inoperable and one RHR train is operable. The time allowed to restore one inoperable loop or train to operable status was restricted to immediately, rather than 14 days as was previously allowed. The time allowed to suspend all operations involving reduction of boron concentration was restricted to immediately. Surveillance requirements were added to verify one RHR train or RCS loop is in operation every 12 hours, verify that the secondary side water levels are $\geq 16\%$ for required RCS loops every 12 hours, and to verify correct breaker alignment and indicated power are available to the required pump that is not in operation every 7 days.	LCO 3.4.6 Required Actions A.1, B.1, C.1 and C.2 SR 3.4.6.1, SR 3.4.6.2, SR 3.4.6.3	3.1.1.1
3.4 M12	A Note was added which restricted removal of both RHR loops from operation in MODE 4 during heatup to only when at least one RCS loop is in operation. Surveillance requirements were added to verify that one RHR train is in operation every 12 hours, verify that the steam generator secondary side water level is $\geq 16\%$ in the required steam generator every 12 hours, and verify that the correct breaker alignment and indicated power are available to the required RHR pump that is not in operation every 7 days.	LCO 3.4.7 NOTE 4 SR 3.4.7.1 SR 3.4.7.2 SR 3.4.7.3	3.3.1.4

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.4 M14	Requirements were added to suspend all operations involving a reduction of RCS boron concentration immediately and initiate action to restore one RHR train to operable status and in operation immediately when required RHR trains are inoperable or no RHR train is in operation.	LCO 3.4.7 Required Actions B.1 and B.2 LCO 3.4.8 Required Actions B.1 and B.2	3.3.1.4
3.4 M15	A requirement for one RHR train to be in operation was added for MODE 5 specifications.	LCO 3.4.7 LCO 3.4.8	3.3.1.4
3.4 M39	The time requirement to restore an inoperable RHR train to operable status was restricted to immediately, rather than 14 days as was previously allowed. A requirement was added to restore required steam generator secondary side water level to within limits immediately if the water level is not within limits.	LCO 3.4.7 Required Actions A.1 and A.2	3.3.1.4
3.4 M16	Surveillance requirements were added to verify that one RHR train is in operation every 12 hours, and to verify that the correct breaker alignment and indicated power are available to the RHR pump that is not in operation every 7 days.	SR 3.4.8.1 SR 3.4.8.2	3.3.1.4
LCO 3.4.9, "Pressurizer"			
3.4 M17	The requirements for the pressurizer were extended to apply to MODE 3, rather than only to reactor subcriticality less than 1% as was previously required.	LCO 3.4.9 Applicability	3.1.3.4

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.4 M18	The time to reach MODE 3 was limited to 6 hours and the time to reach MODE 4 was limited to 12 hours when the pressurizer heaters and emergency power supplies cannot be restored within the allowed times. Completion times for these actions did not previously exist.	LCO 3.4.9 Required Actions D.1 and D.2	3.1.1.3
3.4 M19	Requirements were added to be in MODE 3 with the reactor trip breakers open and to be in MODE 4 in 12 hours when the pressurizer water level is not within limits.	LCO 3.4.9 Required Actions A.1 and A.2	3.1.1.3
LCO 3.4.10, "Pressurizer Safety Valves"			
3.4 M20	Requirements were added to restore one inoperable pressurizer safety valve to operable status within 15 minutes or if not restored within 15 minutes, or if two or more safety valves are inoperable, be in MODE 3 in 6 hours and MODE 4 in 12 hours.	LCO 3.4.10 Required Actions A.1, B.1 and B.2	3.1.1.3
LCO 3.4.11, "Pressurizer Power operated relief Valves (PORVs)"			
3.4 M21	The time to reach MODE 3 was limited to 6 hours and the time to reach MODE 4 was limited to 12 hours when one or both pressurizer PORVs are inoperable and cannot be manually cycled, and the associated block valves cannot be closed and power removed within one hour. The time to reach MODE 3 was limited to 6 hours and the time to reach MODE 4 was limited to 12 hours when both pressurizer block valves are inoperable and cannot be manually cycled, and the associated PORVs cannot be placed in manual control in one hour or one block valve cannot be restored in two hours. Completion times for these actions were previously 12 hours to reach MODE 3 and 24 hours to reach MODE 4.	LCO 3.4.11 Required Actions D.1, D.2, E.3, E.4, G.1, and G.4	3.1.1.5

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.4 M22	A note was deleted that allowed power operation to continue with a pressurizer block valve closed to isolate minor leakage from the associated PORV.	LCO 3.4.11	3.1.1.5
3.4 M23	An exception to entering required actions when performing surveillance testing on the pressurizer PORVs and associated block valves was deleted.	LCO 3.4.11	3.1.1.5
LCO 3.4.12, "Low Temperature Overpressure Protection (LTOP) System"			
3.4 M35	The setpoint for the LTOP System was lowered from 420 psig to 400 psig with an allowable value of 418 psig.	LCO 3.4.12	3.1.2.1
3.4 M24	The time allowed to depressurize the RCS and establish a vent to the containment when two PORVs are inoperable, or when LTOP cannot be restored to operable status as required, was restricted to 8 hours rather than 12 hours as was previously required.	LCO 3.4.12 Required Action G.1	3.1.2.1

SECTION 3.4, "REACTOR COOLANT SYSTEM,"MATRIX OF MORE RESTRICTIVE CHANGES"

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.4 M25	Requirements were added to the LTOP specification as follows which did not exist previously. The accumulator isolation valves are required to be closed and deactivated in accordance with conditions in a NOTE. If two or more Safety injection (SI) pumps are capable of injecting into the RCS with RCS temperature $\geq 175^{\circ}\text{F}$ and the RCS is not vented, immediate action must be taken to render one SI pump incapable of injecting into the RCS. If one or more Safety injection (SI) pumps are capable of injecting into the RCS with RCS temperature $< 175^{\circ}\text{F}$ and the RCS is not vented, immediate action must be taken to render all SI pump incapable of injecting into the RCS. If an accumulator isolation valve is not closed and deenergized when required the valve is required to be closed and deenergized in one (1) hour. If the accumulator cannot be isolated within one hour, the RCS is required to be heated up to $> 350^{\circ}\text{F}$ within 12 hours or the accumulator is required to be depressurized within 12 hours. Surveillance Requirements are added to verify a maximum of one (1) SI pump capable of injecting into the RCS when required every 12 hours, verify no SI pumps capable of injecting into the RCS when required every 12 hours, and verify each accumulator isolation valve is closed and deenergized every 12 hours.	If LCO 3.4.12 Required Actions A.1, B.1, C.1, D.1, and D.2 SR 3.4.12.1 SR 3.4.12.2 SR 3.4.12.3	3.1.2.1
3.4 M37	The necessary RCS vent size to the containment to assure overpressure protection for the RCS was specified to be at least 4.4 square inches. No specific vent size value was specified previously.	LCO 3.4.12	3.1.2.1

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.4 M26	An allowance to not render all but one SI pump incapable of injecting into the RCS when the RCS is vented to containment atmosphere is deleted.	LCO 3.4.12	3.1.2.1
LCO 3.4.13, "RCS Operational Leakage"			
3.4 M27	The time allowed to reduce RCS leakage (other than pressure boundary leakage) to restore leakage to within limits was reduced to 4 hours from 12 hour as was previously allowed. The time allowed to reach MODE 3 if leakage requirements cannot be met was reduced to 6 hours from 12 hours as was previously allowed. The time allowed to reach MODE 5 if leakage requirements cannot be met was reduced to 36 hours from 42 hours as was previously allowed.	LCO 3.4.13 Required Actions A.1, B.1, and B.2	3.1.5.1 3.1.5.2
3.4 M28	A requirement was added which permits no RCS pressure boundary leakage.	LCO 3.4.13	3.1.5
LCO 3.4.14, "RCS Pressure Isolation Valves (PIVs)"			
3.4 M29	A requirement in a NOTE was added that restricted separate condition entry to a PIV flow path rather than to a PIV. A requirement was added to isolate the affected penetration associated with an inoperable RHR System interlock within 4 hours. A Surveillance Requirement was added to verify that the RHR System interlock prevents the valves from opening on a simulated or actual pressure signal every 18 months.	LCO 3.4.14 Required Action B.1 SR 3.4.14.2	3.1.5.4
3.4 M30	The surveillance requirement to verify PIV leakage was required to be performed within 24 hours following valve actuation or flow through the valve. No previous requirement existed for the condition when a PIV actuated or flow occurred through a PIV.	SR 3.4.14.1	Table 4.1-3, Item 17

Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.4.15, "RCS Leakage Detection Instrumentation"			
3.4 M31, and 3.4 M32	<p>Requirements were added for RCS Leakage Detection Instrumentation as follows. Only a surveillance requirement for RCS Leakage Detection Instrumentation existed previously. A requirement was added that one containment sump level monitor, one containment atmosphere radioactivity monitor (gaseous or particulate), and one containment fan cooler condensate flow rate monitor be operable.</p> <p>Requirements were added to perform an RCS water inventory balance every 24 hours and restore an inoperable containment sump level monitor to operable status within 30 days if the sump level monitor is inoperable. Requirements were added to analyze grab samples of the containment atmosphere every 24 hours, perform an RCS water inventory balance every 24 hours, restore required containment atmosphere radioactivity monitor to operable status within 30 days and verify that the containment fan cooler condensate flow rate monitor is operable every 30 days if the containment atmosphere radioactivity monitor is inoperable. If the containment fan cooler condensate flow rate monitor is inoperable, requirements were added to perform a channel check of the containment atmosphere radioactivity monitor every 8 hours, and perform an RCS water inventory balance every 24 hours. If both the containment atmosphere radioactivity monitor and the containment fan cooler condensate flow rate monitor are inoperable, requirements are added to</p>	<p>LCO 3.4.15, Required Actions A.1, A.2, B.1.1, B.1.2, B.2.1, B.2.2, C.1, C.2, D.1, D.2, E.1, E.2, and F.1 SR 3.4.15.1 SR 3.4.15.2 SR 3.4.15.4 SR 3.4.15.5</p>	5.4.3

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.4 M31, and 3.4 M32 (Continued)	restore each monitor to operable status within 30 days. If these actions cannot be met, requirements are added to be in MODE 3 in 6 hours and MODE 5 in 36 hours. If all required monitors are inoperable, a requirement is added to enter LCO 3.0.3. Surveillance Requirements were added to perform a channel check every 12 hours on the containment atmosphere radioactivity monitor, perform a channel operational test on the containment atmosphere radioactivity monitor every 92 days, and perform a channel calibration on the containment atmosphere radioactivity monitor and containment fan cooler condensate flow rate monitor every 18 months.		
LCO 3.4.15, "RCS Leakage Detection Instrumentation"			
N/A			
LCO 3.4.17, "Chemical and Volume Control System (CVCS)"			
3.4 M40	A surveillance requirement was added to verify seal injection flow ≥ 6 gpm every 12 hours.	SR 3.4.17.1	3.2.5
3.4 M41	The time allowed to reach MODE 3 when requirements for the CVCS cannot be met was limited to 6 hours. No time limit was previously specified.	LCO 3.4.17 Required Action C.1	3.2.3
3.4 M42	Surveillance requirements were added to verify seal injection flow of ≥ 6 gpm from each makeup water pathway from the RWST every 18 months and to verify 300,000 gallons of water in the RWST every 7 days.	SR 3.4.17.2 SR 3.4.17.3	3.2.5

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.4 M43	A requirement that the RCP seal injection be operable was added.	LCO 3.4.17	3.2.2
3.4 M44	Requirements were added as follows. When seal injection to any RCP is not within limits or both required charging pumps are inoperable, action is required immediately to restore seal injection to the RCP and the unit is required to be placed in MODE 3 in 6 hours and to cool down and depressurize the RCS to < 1400 psig within 12 hours. When seal injection to any RCP is not within limits or at least one charging pump is inoperable, action is required immediately to restore seal injection to the RCP and the unit is required to be placed in MODE 3 in 6 hours and in MODE 5 in 36 hours. If both makeup water pathways from the RWST are inoperable, the unit is required to be placed in MODE 3 in 6 hours and in MODE 5 in 36 hours.	LCO 3.4.17 Required Actions D.1, D.2, D.3, E.1, E.2, E.3, F.1, and F.2.	3.2.3
3.4 M45	The time allowed to reach MODE 5 when the requirements for CVCS cannot be met were restricted to 36 hours. No time limit existed previously.	LCO 3.4.17 Required Action C.2	3.2.5
3.4 M46	An allowance to extend the allowed times for CVCS for extended maintenance purposes beyond the times required in the specifications was deleted.	LCO 3.4.17	3.2.4

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Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.5.1, "Accumulators"			
3.5 M1	Requirements for the accumulator were extended to apply to MODES 2 and 3 with pressurizer pressure greater than 1000 psig rather than to reactor critical as previously required.	LCO 3.5.1 Applicability	3.3.1.1
3.5 M2	A requirement to verify the position of the accumulator isolation valves once prior to removing power from the valves was added to the surveillance requirements for the accumulator isolation valves. A frequency of 31 days was imposed on the surveillance requirement to verify power is removed from the accumulator isolation valves. No surveillance frequency previously existed.	SR 3.5.1.1 SR 3.5.1.5	3.3.1.1
3.5 M3	A frequency of 12 hours was imposed on the surveillance requirements to verify minimum accumulator pressure and contained borated water. No surveillance frequency previously existed.	SR 3.5.1.2 SR 3.5.1.3	3.3.1.1
3.5 M4	The time to reach MODE 3 was limited to 6 hours in the required action for the accumulators specification. Completion times for these actions did not previously exist.	LCO 3.5.1 Required Action D.1	3.3.1.2
3.5 M5	The time to reach MODE 4 with pressurizer pressure \leq 1000 psig was limited to 12 hours in the required action for the accumulators specification. Completion times for these actions did not previously exist.	LCO 3.5.1 Required Action D.2	3.3.1.2

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.5 M7	A requirement was added to enter LCO 3.0.3 immediately in the event that two or more accumulators are inoperable. The allowed time to reach MODE 3 in this condition was therefore limited to seven (7) hours rather than eight (8) hours as was previously required.	LCO 3.5.1 Required Action E.1	3.3.1.2
3.5 M8	A requirement was added to verify accumulator boron concentration within limits once within six (6) hours after each solution volume increase of ≥ 70 gallons that is not the result of addition from the RWST.	SR 3.5.1.4	Table 4.1-2 Item 6
3.5 M9	Requirements were added to verify that the accumulator boron concentration is ≥ 1950 ppm and ≤ 2400 ppm when performing the surveillance requirement for the accumulators. No maximum requirement existed previously.	SR 3.5.1.4	Table 4.1-2 Item 6
3.5 M10	The maximum allowed time between performance of the surveillance requirement for verifying accumulator boron concentration is within limits was limited to 39 days rather than 45 days.	SR 3.5.1.4	Table 4.1-2 Item 6
LCO 3.5.2, "ECCS-Operating"			
3.5 M11	A surveillance requirement was added to verify by visual inspection the ECCS train containment sump suction inlet is not restricted by debris and the suction inlet trash racks and screens show no evidence of structural distress or abnormal corrosion every 18 months.	SR 3.5.2.6	3.3.1.1
3.5 M12	A surveillance requirement was added to verify that manual valve RHR-764 is locked in the open position every 92 days.	SR 3.5.2.8	3.3.1.1

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.5 M22	The requirements for removing control power and air from certain ECCS valves were extended to apply to MODES 1, 2, and 3, rather than to plant conditions with RCS pressure greater than 1000 psig as was previously required.	SR 3.5.2.1	3.3.1.1
3.5 M13	The allowed time between surveillance requirements were limited to 18 months rather than refueling interval. The length of time between refueling intervals was not specified in the previous requirements.	SR 3.5.2.4 SR 3.5.2.5	4.5.1.1
3.5 M14	A surveillance requirement was changed to require that the appropriate ECCS pump starts, rather than the appropriate ECCS pump breaker closes.	SR 3.5.2.5	4.5.1.2
3.5 M15	A requirement was added to verify two additional high head SI valves in the open position with the control power to the operators removed every 12 hours.	SR 3.5.2.1	4.5.2.1
LCO 3.5.3, "ECCS-Shutdown"			
3.5 M11	A surveillance requirement to meet surveillance requirements SR 3.5.2.3 and SR 3.5.2.6 was added to the specifications for ECCS during shutdown.	SR 3.5.3.1 SR 3.5.2.6	3.3.1.1
3.5 M17	Requirements were added to restore required high head injection subsystem to operable status within one (1) hour when the required high head injection subsystem is inoperable, and if not restored within the time limit, to be in MODE 5 in 24 hours.	LCO 3.5.3 Required Actions B.1 and C.1	3.3.1.2
N/A			

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Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.5.4, "Refueling Water Storage Tank"			
3.5 M18	Requirements were added to restore an inoperable RWST to operable status within one (1) hour. The time to reach MODE 3 was limited to 6 hours and the time to reach MODE 5 was limited to 36 hours when the RWST cannot be restored within one (1) hour. The effect of this change is to restrict the time to meet applicable MODES to one less hour than previously allowed.	LCO 3.5.4 Required Actions B.1, C.1, and C.2	3.3.1.1
3.5 M19	A surveillance requirement was added to verify the RWST borated water temperature is $\geq 45^{\circ}\text{F}$ and $\leq 100^{\circ}\text{F}$ every 24 hours.	SR 3.5.4.1	3.3.1.1
3.5 M20	The allowed time between surveillance requirements for the RWST boron concentration was restricted to 7 days rather than 10 days as was previously required. Previously there was no requirement on maximum boron concentration.	SR 3.5.4.3	Table 4.1-2 Item 3
3.5 M21	Requirements were added to the surveillance requirement to verify that boron concentration is within ≥ 1950 ppm and ≤ 2400 ppm in the RWST.	SR 3.5.4.3	Table 4.1-2 Item 3
3.5 M23	An allowance to permit any SI flow path to be isolated for Pressure Isolation Valve testing was restricted to apply only to isolation of a cold leg safety injection flow path.	LCO 3.5.2 Applicability	3.3.1.1.e

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Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.6.1, "Containment"			
3.6 M1	Requirements were added to restore an inoperable containment to operable status within one (1) hour. The time to reach MODE 3 was limited to 6 hours and the time to reach MODE 5 was limited to 36 hours when the containment cannot be restored within one (1) hour. The effect of this change is to restrict the time to meet applicable MODES to one less hour than previously allowed.	LCO 3.6.1 Required Actions A.1, B.1, and B.2	3.6.1
LCO 3.6.2, "Containment Air Lock"			
3.6 M2	Requirements were added for when one containment air lock door is inoperable to verify the operable door is closed within one (1) hour, lock the operable door closed within 24 hours and verify the operable door is locked closed once per 31 days.	LCO 3.6.2 Required Actions A.1, A.2, and A.3	3.6.1
3.6 M3	Requirements were added for when one containment air lock mechanism is inoperable to verify an operable door is closed within one (1) hour, lock an operable door closed within 24 hours and verify an operable door is locked closed once per 31 days. A surveillance requirement was added to verify that only one containment air lock door can be opened at a time every 24 months.	LCO 3.6.2 Required Actions B.1, B.2, and B.3	3.6.1
3.6 M4	Requirements were added for when the containment air lock is inoperable for reasons other than an inoperable door or lock mechanism to verify a door is closed in the air lock within one (1) hour and restore the air lock to operable status within 24 hours.	LCO 3.6.2 Required Actions C.2 and C.3	3.6.1

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.6 M5	When requirements for the containment air lock cannot be met, the time to reach MODE 3 was limited to 6 hours and the time to reach MODE 5 was limited to 36 hours, rather than 8 hours and 38 hours, respectively, as was previously required.	LCO 3.6.2 Required Actions D.1 and D.2	3.6.1
LCO 3.6.3, "Containment Isolation Valves"			
3.6 M6	A requirement was added to place the plant in MODE 3 within 6 hours in the event that the requirements for inoperable containment isolation valves cannot be met. No previous requirement to reach MODE 3 existed.	LCO 3.6.3 Required Action D.1	3.6.3
3.6 M7	Requirements for inoperable automatic containment isolation valves were extended to apply to manual valves.	LCO 3.6.3 Required Actions A.1, B.1, and C.1	3.6.3
3.6 M8	An allowance to use a check valve to isolate an inoperable penetration with only one isolation valve and a closed system was deleted.	LCO 3.6.3 Required Action C.1	3.6.3
3.6 M9	The allowed outage time for two inoperable containment isolation valves was reduced to one (1) hour from four (4) hours.	LCO 3.6.3 Required Action B.1	3.6.3
3.6 M10	Requirements were added to verify the affected containment penetration flow path is isolated every 31 days when an inoperable containment penetration has been isolated in accordance with requirements.	LCO 3.6.3 Required Actions A.2 and C.2	3.6.3
3.6 M32	The time to reach MODE 3 was limited to 6 hours and the time to reach MODE 5 was limited to 36 hours when both the 6" and 42" purge valves are discovered open, rather than 8 hours and 38 hours, respectively, as was previously required.	LCO 3.6.3 Condition D	3.6.4

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.6 M11	The allowed time between surveillances for the containment isolation valves were limited to 18 months rather than refueling interval. The length of time between refueling intervals was not specified in the previous requirements.	SR 3.6.3.5	Table 4.1-3 Item 5
3.6 M12	Requirements were added to the surveillance of the containment isolation valves to verify each automatic containment isolation valve that is not locked, sealed or otherwise secured in position actuates to the isolation position on an actual or simulated actuation signal.	SR 3.6.3.5	Table 4.1-3 Item 5
3.6 M13	Surveillance requirements were added to verify the position of containment isolation valves located outside containment every 31 days, verify the position of containment isolation valves inside containment prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days, and verify each 42 inch inboard containment purge valve is blocked to restrict the valve from opening > 70°.	SR 3.6.3.2 SR 3.6.3.6 SR 3.6.3.6	4.4.2
LCO 3.6.4, "Containment Pressure"			
3.6 M14	The allowed time to restore containment pressure to within the required limits was limited to one (1) hour, rather than eight (8) hours as was previously required.	LCO 3.6.4 Required Action A.1	3.6.2
3.6 M15	The allowed time to reach MODE 3 in the event that requirements for containment pressure cannot be met was limited to six (6) hours where no time requirement previously existed. A requirement was added to reach MODE 5 in 36 hours in the event that the requirements for containment pressure cannot be met.	LCO 3.6.4 Required Actions B.1 and B.2	3.6.2

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.6 M16	Requirements for containment pressure were extended to apply to MODES 1, 2, 3, and 4, rather than to power operations and reactor critical as was previously required.	LCO 3.6.4 Applicability	3.6.2
3.6 M17	A surveillance requirement was added to verify that containment pressure is within limits every 12 hours.	SR 3.6.4.1	3.6.2
LCO 3.6.5, "Containment Air Temperature"			
3.6 M18	Requirements were added for containment air temperature. No requirements previously existed.	LCO 3.6.5	3.6
LCO 3.6.6, "Containment Spray and Cooling Systems"			
3.6 M19	A requirement was added to enter LCO 3.0.3 immediately in the event that two containment spray trains or any combination of three or more trains are inoperable. The allowed time to reach MODE 3 in this condition was therefore limited to seven (7) hours rather than eight (8) hours as was previously required.	LCO 3.6.6 Required Action F.1	3.6.2.2
3.6 M20	Surveillance requirements were added to operate each containment cooling fan unit for ≥ 15 minutes every 31 days, verify cooling water flow rate to each cooling unit is 750 gpm every 31 days, and verify each containment cooling train starts automatically on an actual or simulated actuation signal every 18 months.	SR 3.6.6.2 SR 3.6.6.3 SR 3.6.6.7	4.5.1.6

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.6 M30	Requirements were added to the surveillance requirements to verify each containment spray pump starts automatically and to verify each automatic containment spray 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 signal.	SR 3.6.6.5 SR 3.6.6.6	4.5.1.3
3.6 M31	The allowed time between surveillances for the containment spray system was limited to 18 months rather than refueling interval. The length of time between refueling intervals was not specified in the previous requirements.	SR 3.6.6.5 SR 3.6.6.6	4.5.1.3
3.6 M34	A requirement that allowed surveillance tests to be satisfied on the basis of visual observation that components have operated satisfactorily has been deleted.	SR 3.6.6.5 SR 3.6.6.6	4.5.1.5
3.6 M33	The surveillance requirements to verify valves in the containment spray system flow paths are in the correct position were extended to apply to MODES 1, 2, 3, and 4, rather than to power operations as was previously required.	SR 3.6.6.1	4.5.2.2
LCO 3.6.7, "Spray Additive System"			
3.6 M21	Surveillance requirements were added to verify that the spray additive tank solution volume is ≥ 2505 gallons every 184 days and to verify the spray additive tank NaOH solution concentration is $\geq 30\%$ every 184 days.	SR 3.6.7.2 SR 3.6.7.3	3.6.2.1

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.6 M34	A requirement that allowed surveillance tests to be satisfied on the basis of visual observation that components have operated satisfactorily has been deleted. A requirement was added to the surveillance requirement for the spray additive system to verify each 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 signal.	SR 3.6.7.4	4.5.1.3 4.5.1.5
3.6 M33	The surveillance requirements to verify valves in the containment spray additive system flow paths are in the correct position were extended to apply to MODES 1, 2, 3, and 4, rather than to power operations as was previously required.	SR 3.6.7.1	4.5.2.2
LCO 3.6.8, "Isolation Valve Seal Water System"			
3.6 M24	The requirements for the Isolation Valve Seal Water System (IVSW) were extended to apply to MODES 1, 2, 3, and 4, rather than to power operations as was previously required.	LCO 3.6.8	3.6.6.1
3.6 M25	The allowed time to reach MODE 5 if the requirements of an inoperable IVSW System cannot be met was limited to 36 hours. No time limit previously existed.	LCO 3.6.8 Required Action B.2	3.6.6.2
3.6 M26	A requirement was added to the surveillance requirement for the IVSW system to verify each automatic valve actuates to the correct position on an actual or simulated actuation signal.	SR 3.6.8.4	Table 4.1-3 Item 15

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.6 M29	The allowed time between surveillances for the IVSW system was limited to 18 months rather than refueling interval. The length of time between refueling intervals was not specified in the previous requirements.	SR 3.6.8.4 SR 3.6.8.6	Table 4.1-3 Item 15
3.6 M23	Requirements were added to the surveillance requirement for the IVSW System to verify specific header flow rates which demonstrate the system's capability for sealing containment isolation valves.	SR 3.6.8.6	4.4.2
3.6 M27	Surveillance requirements were added to verify the IVSW tank pressure is ≥ 44 psig every 12 hours, verify the IVSW tank volume is ≥ 85 gallons every 31 days, and verify the IVSW dedicated nitrogen bottles will pressurize the IVSW tank to ≥ 44 psig every 18 months.	SR 3.6.8.1 SR 3.6.8.2 SR 3.6.8.5	4.4.2

SECTION 3.7, "PLANT SYSTEMS," MATRIX OF MORE RESTRICTIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.7.1, "Main Steam Safety Valves," and LCO 3.7.2, "Main Steam Isolation Valves"			
3.7 M1	The Required Actions for Main Steam Safety Valves (MSSVs) and Main Steam Isolation Valves (MSIVs) were made to be applicable to MODES 2 and 3 for the MSSVs, and MODES 2 and 3 with the MSIVs open for the MSIVs, rather than only to MODE 1 as is currently required.	LCO 3.7.1 Applicability LCO 3.7.2 Applicability	3.4.3
3.7 M2	The time to reach MODE 3 was limited to 6 hours and the time to reach MODE 4 was limited to 12 hours in actions for the MSSV Specification. Completion times for these actions did not previously exist.	LCO 3.7.1 Required Actions C.1 and C.2	3.4.3
3.7 M3	The 24 hour time allowed for more than two (2) inoperable MSSVs was eliminated from current requirements.	LCO 3.7.1 Required Actions C.1 and C.2	3.4.3
3.7 M4	The time to reach MODE 2 was limited to 6 hours in the action for the MSIV Specification. A completion time did not previously exist. A new action to close an inoperable MSIV within 8 hours with the plant in MODE 3 and verify the MSIV closed once per 7 days was added where no requirements previously existed. A new action to place the plant in MODE 3 within 6 hours and MODE 4 within 12 hours if the inoperable MSIV cannot be closed was added where no requirements previously existed.	LCO 3.7.2 Required Actions B.1, C.1, C.2, D.1 and D.2	3.4.3

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Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.7.3 "Main Feedwater Isolation Valves (MFIVs), Main Feedwater Regulation Valves (MFRVs), and Bypass Valves"			
3.7 M5	A new specification for Main Feedwater Isolation, Regulation, and Bypass Valves to be operable was added. No requirements for these valves previously existed.	LCO 3.7.3	3.4
LCO 3.7.4, "Auxiliary Feedwater System"			
3.7 M6	The requirements for a single Auxiliary Feedwater (AFW) System pump and flow path were extended to apply to when the Steam Generators are being used for heat removal.	LCO 3.7.4 Applicability	3.4.1
3.7 M7	The total time that the requirements for the AFW System cannot be met for any and all reasons was limited to 8 days before all requirements for the AFW system must be met. An overall completion time for failure to meet the AFW System requirements did not previously exist.	LCO 3.7.4 Required Actions A.1 and B.1	3.4.5
3.7 M8	A requirement to reach MODE 4 within 18 hours was added for the condition when the plant is required to shut down due to inoperable AFW components. No requirement to reach MODE 4 previously existed.	LCO 3.7.4 Required Action C.2	3.4.4
3.7 M9	A requirement to reach MODE 4 within 18 hours was added for the condition when the plant is required to shut down due to inoperable AFW components. No requirement to reach MODE 4 previously existed.	LCO 3.7.4 Required Action C.2	3.4.5

SECTION 3.7, "PLANT SYSTEMS," MATRIX OF MORE RESTRICTIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.7 M10	A condition for three motor driven AFW flow paths was added. If the plant is in this condition, the plant must be shut down to MODE 4 conditions. A requirement to reach MODE 3 in 6 hours and MODE 4 in 18 hours was added for the condition when a steam driven AFW pump or flow path is inoperable in conjunction with a motor driven AFW pump or flow path. A requirement to restore a required inoperable AFW pump or flow path in MODE 4 immediately was added.	LCO 3.7.4 Required Actions D.1, D.2, F.1	3.4.4, 3.4.5
N/A			
3.7 M12	The testing requirement for AFW system pump discharge valves was extended to include all valves that actuate automatically which are not locked, sealed or otherwise secured in the required position	SR 3.7.4.3	4.8.3
3.7 M13	Surveillance requirements for the AFW system were added verifying that AFW valves are in the correct position every 31 days, verifying that the AFW pumps start automatically on an actual or simulated signal every 18 months, verifying that the AFW system is properly aligned to the Condensate Storage System after an extended plant shutdown, and verifying that the automatic bus transfer switch supplying power to one AFW valve operates automatically when required.	SR 3.7.4.1, SR 3.7.4.4, SR 3.7.4.5, SR 3.7.4.6	4.8
LCO 3.7.5, "Condensate Storage Tank (CST)"			
3.7 M14	The requirements for the Condensate Storage Tank requirements were extended to include MODE 4 when the Steam Generators are being used for heat removal.	LCO 3.7.5 Applicability	3.4.1

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.7 M15	The Required Actions for the Condensate Storage Tank (CST) were made to be applicable to MODES 2, 3, and 4 when the steam generators are used for heat removal, rather than only to MODE 1 as is currently required.	LCO 3.7.5 Applicability	3.4.3
3.7 M16	The time to reach MODE 3 was limited to 6 hours and the time to reach MODE 4 was limited to 18 hours in action for the CST Specification. Completion times for these actions did not previously exist.	LCO 3.7.5 Required Actions B.1 and B.2	3.4.3
3.7 M17	A requirement to verify by administrative means that the backup water supply to the AFW is operable within 4 hours and once per 12 hours thereafter was added for the condition when the CST water level is below the required limit. No requirement to verify the backup water supply previously existed. A requirement to reach MODE 3 within 6 hours and MODE 4 without reliance on the steam generators for heat removal was added for the condition when the Service Water System (SWS) supply to the AFW system is inoperable. No requirement for this condition previously existed. Surveillance requirements for the CST were added verifying that CST level is greater than the required limit every 12 hours and verifying by administrative means the operability of the backup SWS supply to the AFW system.	LCO 3.7.5 Required Actions A.1, C.1 and C.2 SR 3.7.5.1, SR 3.7.5.2	3.4

SECTION 3.7, "PLANT SYSTEMS," MATRIX OF MORE RESTRICTIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
<p style="text-align: center;">LCO 3.7.6, "Component Cooling Water System," and LCO 3.7.7, Service Water System"</p>			
3.7 M18	The time to reach MODE 3 was limited to 6 hours and the time to reach MODE 5 was limited to 36 hours for actions in both the Component Cooling Water (CCW) System and SWS Specifications. Completion times for these actions did not previously exist.	LCO 3.7.6 Required Actions B.1 and B.2, LCO 3.7.7 Required Actions D.1 and D.2	3.3.3.2 3.3.4.2
3.7 M19	The requirement to enter the Residual Heat Removal (RHR) System requirements, which is a system supported by the CCW System, when one required train of CCW is inoperable was added. Surveillance requirements for the CCW System were added verifying that CCW valves are in the correct position every 31 days and verifying that the CCW pumps start automatically on an actual or simulated signal every 18 months.	LCO 3.7.6 Required Action A note, SR 3.7.6.1, SR 3.7.6.2	3.3.3.2
3.7 M20	The time to reach MODE 5 was limited to 36 hours for actions in both the Component Cooling Water (CCW) System and SWS Specifications. Completion times for these actions did not previously exist.	LCO 3.7.6 Required Actions B.1, LCO 3.7.7 Required Action D.2	3.3.3.3, 3.3.4.3
3.7 M21	The requirement to enter the AC electrical power sources requirements, which is a system supported by the SWS, when one required train of SWS is inoperable was added. A requirement to close and deactivate an inoperable Turbine Building loop isolation valve within 72 hours and to verify the valve is closed every 31 days was added. A requirement to close and deactivate one of two inoperable Turbine Building loop isolation valves in 2 hours was added.	LCO 3.7.7 Required Action A Note, Required Actions B.1, B.2, and C.1	3.3.4.2

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.7 M22	Surveillance requirements for the SWS were added verifying that valves in the SWS are in the correct position every 31 days and verifying that automatic valves in the flow path actuate to the correct position on an actual or simulated signal every 18 months.	SR 3.7.7.1 SR 3.7.7.2	3.3.4
3.7 M23	A surveillance requirement for the SWS was added verifying that the automatic bus transfer switch supplying power to one Turbine Building loop isolation valve operates automatically when required.	SR 3.7.7.4	3.3.4
LCO 3.7.8, "Ultimate Heat Sink (UHS)"			
3.7 M24	The requirements for the Ultimate Heat Sink were extended to include MODE 4 conditions.	LCO 3.7.8 Applicability	3.4.1
3.7 M25	The requirements for taking actions associated with inoperable components of the Ultimate Heat Sink were extended to include MODE 4 conditions.	LCO 3.7.8 Applicability	3.4.3
3.7 M26	The time to reach MODE 3 was limited to 6 hours and the time to reach MODE 5 was limited to 36 hours in the Ultimate Heat Sink Required Actions. Completion times for these actions did not previously exist.	LCO 3.7.8 Required Actions B.1 and B.2	3.4.3
3.7 M27	Surveillance Requirements for the Ultimate Heat Sink were added verifying that the lake water level meets requirements every 24 hours and verifying that the SWS temperature is less than or equal to 95°F every 24 hours.	SR 3.7.8.1, SR 3.7.8.2	3.4

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Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.7.9, "Control Room Emergency Filtration System (CREFS)," and LCO 3.7.10, "Control Room Emergency Air temperature Control (CREATC)"			
3.7 M28	The time to reach MODE 3 was changed from eight (8) hours to six (6) hours for an inoperable Control Room Emergency Filtration System (CREFS) or Control Room Emergency Air Temperature Control (CREATC) System train that cannot be restored to operable status within the allowed time.	LCO 3.7.9 Required Action B.1 LCO 3.7.10 Required Action B.1	3.15.1.a
3.7 M29	The time to reach MODE 3 was changed from eight (8) hours to six (6) hours for two inoperable CREFS or CREATC System trains of which one cannot be restored to operable status within the allowed time.	LCO 3.7.9 Required Actions F.1 and F.2 LCO 3.7.10 Required Actions F.1 and F.2	3.15.1.b
3.7 M30	A requirement to suspend movement of irradiated fuel assemblies was added when both trains of CREFS and CREATC are inoperable during movement of irradiated fuel assemblies.	LCO 3.7.9 Required Action C.2 LCO 3.7.10 Required Action C.2	3.15.2.b
3.7 M31	The Surveillance Requirement for verification of Control Room positive pressure was made more restrictive by requiring a specific value be met for the air pressure relative to the outside atmosphere. The requirement is that the differential air pressure be at least one-eighth (1/8) inch water column.	SR 3.7.9.4	4.15.f.4
3.7 M32	A Surveillance Requirement for verification of Control Room Air Temperature Control cooling capacity was added.	SR 3.7.10.1	4.15.f.2

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Discussion of Change	Summary of Change	ITS Section	CTS Section
LC0 3.7.11, "Fuel Building Air Cleanup System"			
3.7 M33	Surveillance Requirements were added for the Fuel Building Air Cleanup System (FBACS) verifying that the FBACS be run for 10 continuous hours with the heaters operating automatically every 31 days, verifying that the FBACS be tested in accordance with the Ventilation Filter Testing Program, and verifying that the FBACS can maintain a negative pressure in the Fuel Building with respect to the outside atmosphere every 18 months.	SR 3.7.11.1 SR 3.7.11.2 SR 3.7.11.3	3.8.2
LC0 3.7.12 "Fuel Storage Pool water Level"			
3.7 M34	A new specification for Fuel Storage Pool Water Level was added which requires that a minimum of 21 feet of water be maintained above the fuel. No requirement for this value previously existed.	LC0 3.7.12	3.8
LC0 3.7.13 "Fuel Storage Pool Boron Concentration"			
3.7 M35	A requirement to suspend movement of fuel assemblies in the fuel storage pool was added when the fuel storage pool boron concentration is not within requirements during movement of fuel assemblies in the fuel storage pool.	LC0 3.7.13, Required Action A.1	5.4.3
3.7 M36	The frequency for sampling boron concentration in the fuel storage pool was increased from prior to refueling or fuel movement in the fuel storage pool to every seven (7) days.	SR 3.7.13.1	Table 4.1-2, Item 7

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Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.7.14 "New and Spent Fuel Assembly Storage"			
3.7 M37	A new specification for new and spent fuel storage pool storage was added which requires that new and spent fuel be stored in approved locations. Only a surveillance requirement previously existed.	LCO 3.7.14	5.4
3.7 M38	A surveillance requirement was added to verify that the developed head is \geq the required head for the AFW pumps every 18 months.	SR 3.7.4.2	4.8.1 4.8.2

SECTION 3.8, "ELECTRICAL PLANT SYSTEMS," MATRIX OF MORE RESTRICTIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.8.1, "AC Sources-Operating"			
3.8 M1	The requirements for AC electrical power sources during operation were extended to apply to MODES 3 and 4, rather than only to reactor critical and power operations.	LCO 3.8.1 Applicability	3.7.1 3.7.2
3.8 M21	A requirement was added for the qualified circuit between the offsite transmission network and the onsite emergency AC electrical distribution system to be operable.	LCO 3.8.1	3.7.1
3.8 M2	Requirements that allowed power operation to continue beyond 24 hours provided one or both the diesel generators are operable and reporting requirements to the NRC are met were deleted.	LCO 3.8.1	3.7.2
3.8 M3	The time allowed for the requirements for AC sources during operation to not be met regardless of actions taken was limited to 8 days.	LCO 3.8.1 Required Actions A.2 and B.4	3.7.2
3.8 M4	The time to reach MODE 3 was limited to 6 hours and the time to reach MODE 5 was limited to 36 hours when requirements to restore an inoperable qualified offsite circuit or diesel generator cannot be met.	LCO 3.8.1 Required Actions C.1 and C.2	3.7.2
3.8 M25	A requirement for the diesel generators to achieve steady state voltage ≥ 467 volts and ≤ 493 volts and frequency of ≥ 58.8 Hz and ≤ 61.2 Hz was added to the monthly surveillance test of the diesel generator.	SR 3.8.1.2	4.6.1.1

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.8 M5	Requirements to verify that the diesel generators energize permanently connected loads in ≤ 10 seconds, energizes auto-connected emergency loads through the load sequencer, achieves steady state voltage ≥ 467 volts and ≤ 493 volts and frequency of ≥ 58.8 Hz and ≤ 61.2 Hz, and supplies permanently connected and autoconnected emergency loads for ≥ 5 minutes, were added to the 18 month diesel generator surveillance test.	SR 3.8.1.14	4.6.1.2

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.8 M6	<p>Surveillance requirements were added as follows. Verify correct breaker alignment and indicated power availability for the offsite circuit every 7 days. verify each day tank contains ≥ 140 gallons of fuel oil every 31 days. Check for and remove accumulated water from each day tank every 31 days. Verify the fuel oil transfer system operates to automatically transfer from the storage tank to the day tank every 31 days. Verify each diesel generator starts from standby condition and achieves required voltage and frequency every 184 days. Verify each diesel generator rejects a load greater than or equal to its associated single largest load without tripping on overspeed every 18 months. Verify that each diesel starts on a simulated or actual loss of offsite power signal and achieves required conditions in the required times every 18 months. Verify that each diesel generator starts and achieves required conditions in the required times within five minutes of the 24 hour load test every 18 months. Verify that the interval between each sequenced load block is within ± 0.4 seconds of design interval every 18 months. Verify that each diesel starts on a simulated or actual Engineered Safety Features (ESF) signal and achieves required conditions in the required times every 18 months. Verify the automatic transfer capability of the 4.16 kV bus 2 and the 480 volt emergency bus 1 loads from the unit auxiliary transformer to the startup transformer every 18 months. Verify that when started simultaneously from standby condition each diesel achieves required conditions within 10 seconds every 10 years.</p>	SR 3.8.1.1 SR 3.8.1.4 SR 3.8.1.5 SR 3.8.1.6 SR 3.8.1.7 SR 3.8.1.8 SR 3.8.1.9 SR 3.8.1.10 SR 3.8.1.13 SR 3.8.1.14 SR 3.8.1.15 SR 3.8.1.17	4.6.1

SECTION 3.8, "ELECTRICAL PLANT SYSTEMS," MATRIX OF MORE RESTRICTIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.8 M19	A surveillance frequency requirement of 18 months was added to test the emergency diesel generators trips defeat function.	SR 3.8.1.11	4.6.1.3
3.8 M24	An allowance for exceeding minimum and maximum allowable kW values under the direct monitoring of the manufacturer was deleted.	SR 3.8.1.12	4.6.1.5
LCO 3.8.2, "AC Sources-Shutdown"			
3.8 M7	Requirements were added for AC electrical power sources in MODES 5 and 6, and during movement of irradiated fuel assemblies. No requirements existed previously in these modes.	LCO 3.8.2	3.7
LCO 3.8.3, "Diesel Fuel Oil and Starting Air"			
3.8 M1	The requirements for Diesel Fuel Oil and Starting Air were extended to apply to when the associated diesel generator is required to be operable, rather than only to reactor critical and power operations.	LCO 3.8.3 Applicability	3.7.1
3.8 M8	A requirement was added to restore the diesel generator air receiver pressure to ≥ 210 psig within 48 hours when pressure in one or more diesel generator air accumulators is less than 210 psig.	LCO 3.8.3 Required Actions D.1	3.7.1
3.8 M28	A requirement was added to restore stored fuel oil properties to within limits within 30 days of when one or more diesel generators with fuel oil properties are not within limits.	LCO 3.8.3 Required Action C.1	3.7.1
3.8 M9	Surveillance requirements were added to verify that each diesel generator air start receiver pressure is ≥ 210 psig and to check for and remove accumulated water from each fuel oil storage tank.	SR 3.8.3.3 SR 3.8.3.4	4.6.2

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Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.8.4, "DC Sources-Operating"			
3.8 M1	The requirements for DC electrical power sources were extended to apply to MODES 1, 2, 3, and 4, rather than only to reactor critical and power operations.	LCO 3.8.4 Applicability	3.7.1
3.8 M10	The time to reach MODE 3 was limited to 6 hours and the time to reach MODE 5 was limited to 36 hours when one inoperable DC electrical power source cannot be restored to operable status in two (2) hours.	LCO 3.8.4 Required Actions B.1 and B.2	3.7.2
3.8 M11	Requirements to verify that the "A" Battery capacity is $\geq 80\%$ and the "B" Battery capacity is $\geq 90\%$ were added to the surveillance requirement to perform a performance discharge test.	SR 3.8.4.6	4.6.3
3.8 M13	Surveillance requirements were added to verify that battery cells, cell plates, and racks show no visual indication of physical damage or abnormal deterioration that could degrade battery performance every 18 months, remove visible terminal corrosion, verify battery cell to cell and terminal connections are clean and tight, and are coated with anti-corrosion material every 18 months, and verify each battery charger supplies ≥ 300 amps at $125 \pm$ volts for ≥ 4 hours every 18 months.	SR 3.8.4.2 SR 3.8.4.3 SR 3.8.4.4	4.6
3.8 M12	A requirement to verify battery terminal voltage is ≥ 125.7 volts was added to the surveillance requirement performed on the battery chargers every 7 days.	SR 3.8.4.1	4.6.5

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Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.8.5, "DC Sources-Shutdown"			
3.8 M14	Requirements were added for AC electrical power sources in MODES 5 and 6, and during movement of irradiated fuel assemblies. No requirements existed previously in these modes.	LCO 3.8.5	3.7.1
LCO 3.8.6, "Battery Cell Parameters"			
3.8 M15	Requirements were added for battery cell parameters and average electrolyte temperature to be within specified limits when the associated DC electrical power subsystems are required to be operable. Surveillance requirements were added to verify that battery cell parameters be within Category B limits after a battery discharge or a battery overcharge and to verify average electrolyte temperature of representative cells is $\geq 67^{\circ}\text{F}$.	LCO 3.8.6 Applicability SR 3.8.6.2 SR 3.8.6.3	4.6.3
3.8 M26	A requirement was added to the battery surveillance requirement to verify that battery cell parameters be within Category A limits. Additionally the surveillance requirement was made to apply to all battery cells rather than to every fifth cell, and the allowed frequency of the surveillance was decreased from monthly to seven (7) days.	SR 3.8.6.1	4.6.3
3.8 M29	The surveillance requirement for measuring and recording the temperature of the battery electrolyte of the battery's pilot cell was extended to require measurement of the average of representative cells.	SR 3.8.6.3	4.6.3

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Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.8.7, "AC Instrument Bus Sources-Operating"			
3.8 M16	Requirements were added for AC Instrument Bus Sources during MODES 1, 2, 3, and 4. No requirements existed previously in these modes.	LCO 3.8.7	3.7
LCO 3.8.8, "AC Instrument Bus Sources-Shutdown"			
3.8 M17	Requirements were added for AC Instrument Bus Sources during MODES 5 and 6, and during movement of irradiated fuel assemblies. No requirements existed previously in these modes.	LCO 3.8.8	3.7
LCO 3.8.9, "Distribution Systems-Operating"			
3.8 M18	The requirements for AC distribution systems during operation were extended to apply to MODES 3 and 4, rather than only to reactor critical and power operations.	LCO 3.8.9 Applicability	3.7.1
3.8 M27	The requirement for the 480 volt emergency buses to be energized was extended to require also that all of Train A and Train B AC, DC, and AC instrument bus electrical power distribution subsystems be operable.	LCO 3.8.9	3.7.1
3.8 M20	The total time allowed for failure to meet the distribution systems specifications was limited to 16 hours. Requirements to be in MODE 3 in 6 hours and MODE 5 in 36 hours were added in the event that requirements to restore inoperable AC and DC electrical power distribution subsystems can not be met.	LCO 3.8.9 Required Actions B.1, C.1, F.1, and F.2	3.7.1
3.8 M22	Surveillance requirements were added to verify correct breaker alignments and voltage to AC, DC, and AC instrument bus electrical power distribution systems.	SR 3.8.9.1	Table 4.1-3. Item 18

SECTION 3.8, "ELECTRICAL PLANT SYSTEMS," MATRIX OF MORE RESTRICTIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.8.10, "Distribution Systems-Shutdown"			
3.8 M23	Requirements were added for distribution systems during MODES 5 and 6, and during movement of irradiated fuel assemblies. No requirements existed previously in these modes.	LCO 3.8.10	3.7

SECTION 3.9, "REACTIVITY CONTROL SYSTEMS," MATRIX OF MORE RESTRICTIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.9.1, "Boron Concentration"			
3.9 M1	The requirements for maintaining boron concentration in the primary coolant during refueling operations were extended to apply to MODE 6 rather than to reactor vessel head removal and unloading fuel from the reactor.	LCO 3.9.1 Applicability	3.8.1
3.9 M2	the requirements for maintaining a minimum boron concentration in the primary coolant system were extended to apply to the Reactor Coolant System, refueling canal, and refueling cavity.	LCO 3.9.1	3.8.1
LCO 3.9.2, "Nuclear Instrumentation"			
3.9 M3	The requirements for nuclear instrumentation during refueling operations were extended to MODE 6 rather than to whenever core geometry is being changed.	LCO 3.9.2 Applicability	3.8.1
3.9 M13	A required action was added for the condition of one source range neutron monitor being inoperable to suspend positive reactivity additions. A requirement to cease refueling of the reactor in the event that the specifications for neutron instrumentation cannot be met was extended to apply to core alterations.	LCO 3.9.2 Required Actions A.1 and A.2	3.8.1
3.9 M4	A requirement was added when the specifications for neutron instrumentation cannot be met to perform a surveillance to verify boron concentration is within the limits of the Core Operating Limits Report (COLR) once within four (4) hours and every 12 hours thereafter.	LCO 3.9.2 Required Action B.2	3.8.1
3.9 M5	A surveillance requirement was added to perform a channel calibration every 18 months.	SR 3.9.2.2	3.8.1

SECTION 3.9, "REACTIVITY CONTROL SYSTEMS," MATRIX OF MORE RESTRICTIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.9.3, "Containment Penetrations"			
3.9 M6	A surveillance requirement was added to verify each containment penetration is in the required status every 7 days.	SR 3.9.3.1	3.8.1
LCO 3.9.4, "RHR and Coolant Circulation-High Water Level"			
3.9 M7	A requirement was added to the specifications for the Residual Heat removal (RHR) system for one RHR train to be in operation, and a note was added to allow the operating train to be removed from operation for one (1) hour in any eight (8) hour period.	LCO 3.9.4	3.8.1
3.9 M15	The requirements for RHR and coolant circulation were extended to apply to MODE 6 with water level at least 23 feet above the reactor vessel flange, rather than to whenever fuel assemblies are being moved within the reactor pressure vessel.	LCO 3.9.4 Applicability	3.8.1
3.9 M8	A requirement was added for the condition when the RHR and coolant circulation requirements cannot be met to close all penetrations with direct access to outside within four (4) hours.	LCO 3.9.4 Required Action A.4	3.8.1
3.9 M9	A surveillance requirement was added to verify that one RHR train is in operation every 12 hours.	SR 3.9.4.1	3.8.1
LCO 3.9.5, "RHR and Coolant Circulation-Low Water Level"			
3.9 M10	Requirements were added for RHR and coolant circulation with water level less than 23 feet above the top of the reactor vessel flange. No requirements previously existed.	LCO 3.9.5	3.8.1

SECTION 3.9, "REACTIVITY CONTROL SYSTEMS," MATRIX OF MORE RESTRICTIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
LCO 3.9.6, "Refueling Cavity Water Level"			
3.9 M11	Requirements for refueling cavity water level were extended to apply to during movement for of irradiated fuel assemblies within containment rather than to whenever fuel assemblies are being moved within the reactor vessel.	LCO 3.9.6 Applicability	3.8.1
3.9 M12	A surveillance requirement was added to verify refueling cavity water level \geq 23 feet above the top of the reactor vessel flange every 12 hours.	SR 3.9.6.1	3.8.2
3.9 M16	Requirements for refueling cavity water level were extended to apply to core alterations from whenever fuel assemblies are being moved within the reactor vessel.	LCO 3.9.6 Applicability	3.8.1
3.9 M17	A required action was added to suspend movement of irradiated fuel assemblies in containment in the event that refueling cavity water level is not within limit.	LCO 3.9.6 Required Action A.2	3.8.1
LCO 3.9.7, "Containment Purge Filter System"			
3.9 M18	Surveillance requirements were added to verify that the containment purge filter system is in operation and maintaining containment pressure negative relative to the adjacent auxiliary building every 12 hours and to perform required containment purge filter system testing in accordance with the Ventilation Filter Testing Program.	SR 3.9.7.2 SR 3.9.7.3	3.8.1

SECTION 4.0 "Design Features" MATRIX OF MORE RESTRICTIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
4.0 "Design Features"			
4.0 M1	Requirements regarding fuel storage were expanded to include nominal center to center distance between fuel assemblies placed in the high density and low density fuel racks.	4.3.1.1.c 4.3.1.1.d	5.4
4.0 M2	Requirements regarding fuel storage were expanded to include provisions limiting inadvertent draining the spent fuel pool below 18 feet above the top of the fuel.	4.3.2	5.4
4.0 M3	Requirements regarding design of spent fuel storage racks and new fuel storage racks were expanded to include requiring allowances for uncertainties in calculation of reactivity.	4.3.1.2.b 4.3.1.2.c 4.3.1.1.b	5.4.2.1

SECTION 5.0, "ADMINISTRATIVE CONTROLS," MATRIX OF MORE RESTRICTIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
Section 5.1, "Responsibility"			
5.0 M14	Requirements were added for the control room command function, and for succession for that function. No requirements previously existed.	5.1.2	6.1.1
Section 5.2, "Organization"			
5.0 M1	The requirements for two licensed operators to be present in the control room under certain conditions were extended to be at all times during MODES 1, 2, 3, and 4, and the requirement was added that one of the two operators be a Senior Reactor Operator.	Section 5.2.2	6.2.3
Section 5.4, "Procedures"			
5.0 M2	A requirement was added to maintain written emergency operating procedures.	Section 5.4.1	6.5.1.1.1
5.0 M3	A requirement was added for written procedures to cover all programs specified in Specification 5.5.	Section 5.4.1	6.5.1.1.1
Section 5.5, "Programs and Controls"			
5.0 M4	The level of approval for the Offsite Dose Calculation Manual (ODCM) was restricted from review and acceptance of the Plant Nuclear Safety Committee to approval by the Plant Manager.	Section 5.5.1	6.16.2
5.0 M12	Requirements were added for the content of the ODCM to include the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Radiological Environmental Operating and Radioactive Effluent Release Reports.	Section 5.5.1	6.16.2

SECTION 5.0, "ADMINISTRATIVE CONTROLS," MATRIX OF MORE RESTRICTIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
5.0 M5	A program for component cyclic or transient limits was added to track Updated Final Safety Analysis Report (UFSAR) transient occurrences.	Section 5.5.5	1.0
5.0 M11	A program was added that provides controls for the relocated requirements for control of radioactive effluents contained in the Current Technical Specifications Radiological Environmental Technical Specifications.	Section 5.5.4	1.0
5.0 M13	A program was added for primary coolant sources outside of containment that duplicates Facility Operating License DPR-23, paragraph 3.G(2).	Section 5.5.2	1.0
5.0 M9	Requirements for the Prestressed Concrete Containment Tendon Surveillance Program were added for controls for monitoring any tendon degradation and effectiveness in corrosion protection medium, frequencies, and acceptance criteria.	Section 5.5.6	4.4.4.1
5.0 M6	Requirements were added for the Technical Specification Bases Control Program.	Section 5.5.14	4.20
5.0 M7	Requirements were added for the Safety Function Determination Program (SFDP).	Section 5.5.15	4.20
5.0 M15	Requirements were added to perform surveillance tests in the Diesel Fuel Oil testing Program to sample for cloud point, sample every 31 days rather than prior to transfer to the Unit No. 2 storage tank, restrict the allowed extension of the surveillance interval to 38.75 days from 45 days, and determining that the fuel oil is acceptable for use prior to adding the oil to the storage tank.	Section 5.5.13	Table 4.1-2, Items 11 and 12

SECTION 5.0, "ADMINISTRATIVE CONTROLS," MATRIX OF MORE RESTRICTIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
Section 5.6, "Reporting Requirements"			
5.0 M10	A requirement was added that primary safety and relief valve challenges shall be included in the monthly Operating Report, rather than in an annual report as previously required.	Section 5.6.4	6.9.1.2.4
5.0 M8	A requirement was added to include the Emergency Core Cooling System (ECCS) limits in the Core Operating Limits Report (COLR).	Section 5.6.5	6.9.3.3

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 2.0 LA1	6.7.1.c,d,e	Safety Limit reporting requirements	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of reporting requirements
ITS 3.0 LA1	4.0	"Prior to returning the system to service, the specified calibration and testing surveillance shall be performed."	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of testing details
ITS 3.1 LA1	3.10.6.3 and Figure 3.10-2,	Shutdown Margin requirements for an inoperable full length control rod	Core Operating Limits Report (COLR)	10 CFR 50.59	Relocation of values associated with requirements
ITS 3.1 LA1	3.10.8.1	"Shutdown Margin - Hot Shutdown"	COLR	10 CFR 50.59	Relocation of values associated with requirements
ITS 3.1 LA1	3.10.8.2	"Shutdown Margin - Cold Shutdown"	COLR	10 CFR 50.59	Relocation of values associated with requirements
ITS 3.1 LA1	3.10.1.4	"At 50% of the cycle as defined by burnup, the limits shall be adjusted to the end-of-core values as specified in the COLR."	COLR	10 CFR 50.59	Relocation of procedural detail
ITS 3.1 LA2	3.10.1.3	"If bank insertion is not restored to the specified limits"... "the reactor shall be placed in the hot shutdown condition utilizing normal operating procedures within six hours."	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details regarding how required action is accomplished.

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 3.1 R1	3.10.7	Restrictions placed on power ramp rate following a shutdown where core fuel assemblies have been handled	UFSAR	10 CFR 50.59	Relocation of methodology for reactor power changes
ITS 3.2 LA1	3.10.2.1	Algorithms describing the limits of $F_0(Z)$	COLR	10 CFR 50.59	Relocation of descriptive information
ITS 3.2 LA1	3.10.2.2	Algorithms describing the limits of $F_0(Z)$ with core penalty factor, $V(Z)$, included	COLR	10 CFR 50.59	Relocation of descriptive information
ITS 3.2 LA2	3.10.2.1	Algorithm describing the limits of $F\Delta H$, uncertainty factor, and power factor Multiplier	COLR	10 CFR 50.59	Relocation of descriptive information
ITS 3.2 LA3	3.10.2.11	Details concerning the redefinition of the axial flux target bands	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of descriptive information and methodology details
ITS 3.2 LA4	3.10.2.2.2	Details concerning the description of determining $F_0(Z)$ from a power distribution map in terms of measurement and engineering factor uncertainties, and Allowable Power Level	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of descriptive information and methodology details
ITS 3.3 LA1	2.3.1.2.d	Details concerning how the electronic dynamic compensation and delta flux input to the Overtemperature ΔT Reactor Protection System (RPS) function affects its setpoint	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of descriptive information

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 3.3 LA1	2.3.1.2.e	Details concerning how the electronic dynamic compensation and delta flux input to the Overpower ΔT RPS function affects its setpoint	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of descriptive information
ITS 3.3 LA2	2.3.3	"The RCS narrow range temperature sensors response time shall be less than or equal to a 4.0 second lag constant."	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of testing details
ITS 3.3 LA3	3.10.5.1.b	"The reactor shall not be made critical"... "unless the reactor trip bypass breakers are racked out or removed."	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of procedure details
ITS 3.3 LA4	Table 4.1-1,	Instrument channel Testing Requirements.	Technical Requirements Manual (TRM) Offsite Dose Calculation Manual (ODCM)	10 CFR 50.59	Relocation of tests not required to demonstrate operability
ITS 3.3 LA6	Table 3.5-5, Note 5,	Preplanned alternate method of monitoring be available	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning availability of preplanned alternate method of monitoring
ITS 3.3 LA7	Table 3.5-2 Item 15A.	Control Rod Misalignment Monitor function as provided by the "ERFIS Rod Position Deviation" feature and related ACTION No. 9.	TRM	10 CFR 50.59	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 3.3 LA7	Table 3.5-2 Item 15B.	Control Rod Misalignment Monitor function as provided by the "Quadrant Power Tilt Monitor" and related ACTION No. 10.	TRM	10 CFR 50.59	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits
ITS 3.3 LA8	Table 4.1-1 Item 4, Remark (4) associated with RTD cross calibration and Table 4.1-1 Item 30, Remark (1) associated with testing of the RTB UV and shunt trips.	Remark associated with RTD cross calibration and Remark associated with testing of the RTB UV and shunt trips.	Bases for ITS SR 3.3.1.4 and SR 3.3.1.12	Bases Control Program in ITS Section 5.5.14	Relocation of testing details
ITS 3.3 LA9	Table 3.5-1 Items 6.a and 6.b	The Functions' channel action is "Trip normal supply breaker."	UFSAR	10 CFR 50.59	Relocation of descriptive information
ITS 3.3 R1	Table 3.5-5 Item No. 3 and 12, Notes 2 and 7	Requirements for the RCS Subcooling Monitor and Reactor Vessel Level Instrumentation System (RVLIS)	TRM	10 CFR 50.59	Specifications that do not meet 10 CFR 50.36 criteria

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 3.3 R1	Table 3.5-5 Item No. 7 and Note 4	Requirements for the Noble Gas Effluent Monitor - Main Steam Line, Noble Gas Effluent Monitor - Main Vent Stack -High Range, and Noble Gas Effluent Monitor - Spent Fuel Pit Lower Level	TRM	10 CFR 50.59	Specifications that do not meet 10 CFR 50.36 criteria
ITS 3.3 R1	Table 4.1-1 Item No. 38	Testing requirements for the Noble Gas Effluent Monitor - Main Steam Line, Noble Gas Effluent Monitor - Main Vent Stack -High Range, and Noble Gas Effluent Monitor - Spent Fuel Pit Lower Level	TRM	10 CFR 50.59	Specifications that do not meet 10 CFR 50.36 criteria
ITS 3.3 R1	Table 4.1-1 Item No. 34 and 48 and associated testing require- ments	Testing requirements for the RCS Subcooling Monitor and Reactor Vessel Level Instrumentation System (RVLIS)	TRM	10 CFR 50.59	Specifications that do not meet 10 CFR 50.36 criteria
ITS 3.4 LA1	3.1.2.1.a	"Over the temperature range from cold shutdown to hot operating conditions, the heatup rate shall not exceed 60°F in any one hour."	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of methodology for heatup of reactor

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 3.4 LA1	3.1.2.1.b	"Allowable combinations of pressure and temperature for a specific cooldown rate are below and to the right of the limit lines for that rate as shown on Figure 3.1-2. This rate shall not exceed 100°F/hr in any one hour. The limit lines for cooling rates between those shown in Figure 3.1-2 may be obtained by interpolation."	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of methodology for cooldown of reactor and descriptive information
ITS 3.4 LA1	3.1.2.1.c	"Primary system hydrostatic leak tests may be performed as necessary, provided the temperature limitation as noted on Figure 3.1-1 is not violated. Maximum hydrostatic test pressure should remain below 2350 psia."	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of testing details
ITS 3.4 LA1	3.1.2.4.a	Requirements for maintaining the pressure-temperature limit curves in TS Figures 3.1-1 and 3.1-2	UFSAR	10 CFR 50.59	Relocation of details concerning maintaining RCS P/T curves
ITS 3.4 LA1	3.1.2.4.b	Reporting requirements of results of irradiated specimen samples analysis and updated heatup and cooldown curves	UFSAR	10 CFR 50.59	Relocation of reporting requirements
ITS 3.4 LA2	3.1.1.1.a.1	The specific 4% shutdown margin when < 2% Rated Thermal Power (RTP) and < 2 reactor coolant pumps operating	COLR	10 CFR 50.59	Relocation of values associated with requirements

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 3.4 LA3	3.1.1.3.a	"At least one Pzr code safety valve shall be operable whenever the Reactor Head is on the vessel and the RCS is not open for maintenance."	TRM	10 CFR 50.59	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits
ITS 3.4 LA4	4.2.4.1.a	Requirement that each Pressurizer Power Operated Relief Valve (PORV) be demonstrated operable by performing a channel calibration at each refueling	TRM	10 CFR 50.59	Relocation of details concerning testing methodology not required for operability
ITS 3.4 LA4	4.2.4.3	Requirement to demonstrate that the nitrogen accumulators for the Pressurizer PORVs are operable by cycling the PORVs through one complete cycle at each refueling	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning testing methodology
ITS 3.4 LA5	3.1.5.4.a	Requirement that all pressure isolation valves listed in Table 3.1-1 be functional as a pressure isolation device except as specified in TS Section 3.1.5.4.b during reactor operation and hot shutdown conditions	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of descriptive details concerning operability
ITS 3.4 LA5	3.1.5.4.b	The compensatory measure for a non-functional pressure isolation valve; "Manual valves shall be locked in the closed position."	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of descriptive details associated with taking a required action

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 3.4 LA5	Table 4.1-3 Item No. 17	Requirement to perform Primary Coolant System check valve tests after maintenance, repair or replacement work is performed	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details associated with post maintenance testing to declare operability
ITS 3.4 LA5	Table 4.1-3 Item No. 17.1 Note a.	Allowance that Pressure Isolation Valve (PIV) leakage may be measured indirectly if accomplished in accordance with approved procedures and supported by computations showing that the method is capable of demonstrating valve leakage compliance	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning testing methodology
ITS 3.4 LA5	Table 4.1-3 Item No. 17.1 Note b.	Minimum test differential pressure for PIVs shall be ≥ 150 psid.	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning testing methodology
ITS 3.4 LA5	Table 4.1-3 Item No. 17.1 Note c.	Allowance that more than one PIV may be tested in parallel provided the total leakage does not exceed 5 gpm	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning testing methodology
ITS 3.4 LA5	Table 3.1-1	Listing of safety injection system PIVs	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of descriptive system information
ITS 3.4 LA6	Table 4.1-2 Item No. 1	Requirement to perform reactor coolant radiochemical test on a monthly frequency	TRM	10 CFR 50.59	Relocation of details concerning testing metrology not required for operability

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 3.4 LA6	Table 4.1-2 Item No. 2	Requirement to perform reactor coolant boron concentration test on a twice/week frequency	TRM	10 CFR 50.59	Relocation of details concerning testing metrology not required for operability
ITS 3.4 LA6	Table 4.1-2 Note (1)	Description of a gross activity analysis.	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning testing methodology
ITS 3.4 LA6	Table 4.1-2 Note (2)	Description of a radiochemical analysis	TRM	10 CFR 50.59	Relocation of details concerning testing methodology
ITS 3.4 LA7	Table 4.1-2 Item No. 4	Requirement to perform Boric Acid Tank boron concentration test on a twice/week frequency	TRM	10 CFR 50.59	Relocation of details concerning testing methodology not required for operability
ITS 3.4 LA8	Table 4.1-3 Item No. 14	Requirement to perform RHR compartment fan functional test and laboratory tests of filter media on a once per operating cycle frequency	TRM	10 CFR 50.59	Relocation of details concerning testing methodology not required for operability
ITS 3.4 LA9	Table 4.1-2 Item No. 10	Requirement to perform S/G samples 5 days/week	TRM	10 CFR 50.59	Relocation of details concerning testing methodology not required for operability
ITS 3.4 R1	Table 4.1-2 Item No. 1	Requirement to sample the reactor coolant system for Chloride and Oxygen on a frequency of 5 times per week	TRM	10 CFR 50.59	Relocation of details concerning testing methodology not required for operability

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 3.4 LA10	Table 4.1-2 Note (3)	Requirement to sample Stack Gas Iodine and Particulate on a weekly bases when iodine or particulate radioactivity levels exceed 10% of the limit in TS Section 3.9.2.1, the sampling frequency shall be increased to a minimum of once per day	ODCM	ODCM in ITS Section 5.5.1	Relocation of details concerning Radiological Effluent Technical Specifications sampling
ITS 3.4 LA11	3.2.1	Requirement for an injection flow path and boric acid equivalent to that supplied from the RWST in all plant conditions with fuel in the vessel	TRM	10 CFR 50.59	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits
ITS 3.4 LA12	3.2.2.b,c,e, & f	Requirements for boric acid transfer pump, boric acid tanks, heat tracing and primary water storage tank	TRM	10 CFR 50.59	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits
ITS 3.5 LA1	3.3.1.2.e	Specific exclusion of the safety injection hot injection pathways and valves from the requirements of TS Section 3.3.1.2	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits
ITS 3.5 LA2	3.3.1.1.c, d, e, & f	Details of ECCS Operability	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of system description details

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 3.6 LA1	1.7.a	Details specifying non-automatic isolation valves be closed and blind flanges be properly installed.	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning methodology for meeting requirements
ITS 3.6 LA2	4.5.1.3	"The test shall be performed with the isolation valves in the spray supply lines at the containment and spray additive tank blocked closed."	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning testing methodology
ITS 3.6 LA3	1.7.d "	"Manual valves qualifying as automatic containment isolation valves are secured closed."	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning methodology for meeting requirements
ITS 3.6 LA4	3.6.4.3	Details of testing of 42 inch purge valves	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning testing methodology
ITS 3.6 LA5	1.7.d "	"All automatic trip valve required to be closed during accident conditions are operable or are secured closed."	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning methodology for meeting requirements
ITS 3.6 LA6	1.7.b	"Equipment door is properly closed and sealed."	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning methodology for meeting requirements
	1.7.c "	At least one door in the personnel air lock is properly closed and sealed."	Bases		

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 3.6 R1	3.3.5	"The reactor shall not be made critical unless the valves of the post accident containment venting system are operable."	TRM	10 CFR 50.59	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits
ITS 3.7 LA1	Table 4.1-3 Item No. 12,	Requirement to check closure of Turbine Steam Stop, Control, Reheat Stop, and Interceptor Valves on a quarterly frequency	TRM	10 CFR 50.59	Relocation of details concerning testing not required for operability
ITS 3.7 LA2	3.13.1.a	Requirement that when the reactor is at power or hot shutdown, if a snubber is determined to be inoperable and an engineering evaluation cannot validate the operability of the supported component then the supported component shall be declared inoperable. If operability can be validated then the snubber shall be returned to operable status within 72 hours.	TRM	10 CFR 50.59	Relocation of descriptive details concerning components that support operability
ITS 3.7 LA2	3.13.1.b	"If a snubber is determined to be inoperable while the reactor is in cold shutdown, the snubber (if needed for a supported component protection) shall be repaired and reinstalled or replaced prior to reactor startup."	TRM	10 CFR 50.59	Relocation of testing details concerning components that support operability

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 3.7 LA2	4.13	Snubber Testing Requirements	TRM	10 CFR 50.59	Relocation of testing details concerning components that support operability
ITS 3.7 LA3	4.15.a .	Requirements to verify Control Room air temperature every 12 hrs	TRM	10 CFR 50.59	Relocation of details concerning testing not required for operability
ITS 3.7 LA4	5.4.3	"This minimum boron concentration ensures subcriticality under worst case design events," and references	UFSAR	10 CFR 50.59	Relocation of details concerning methodology for meeting requirements
ITS 3.7 LA5	3.12	Seismic shutdown	TRM	10 CFR 50.59	Relocation of descriptive actions and procedural detail associated with a seismic event
ITS 3.7 LA6	5.4.2.1	New Fuel Storage Rack secured location restrictions	UFSAR	10 CFR 50.59	Relocation of system description details
ITS 3.7 LA7	CTS 4.8.1 and 4.8.2	Requirements to test AFW pumps monthly	Inservice Testing Program	10 CFR 50.59	Relocation of details concerning testing not required for operability
ITS 3.7 LA8	CTS 4.12.3	Requirement to monitor relative humidity of air processed by spent fuel ventilation portion of the Refueling Filter System	TRM	10 CFR 50.59	Relocation of details concerning testing not required for operability

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 3.8 LA1	3.7.1.d	Description of specific automatic trips that are required to be bypassed for an operable Emergency Diesel Generator (EDG).	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of system description details
ITS 3.8 LA1	3.7.2.e and 4.6.1.3	Description of specific automatic trips that are required to be bypassed for an operable EDG. (As referenced to CTS 3.7.1.d)	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of system description details
ITS 3.8 LA2	3.7.3	Restriction allowing the back-feeding of the emergency busses via the unit auxiliary transformer only while the reactor is in cold shutdown unless nuclear safety considerations require it to be done during hot shutdown	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits
ITS 3.8 LA3	4.6.1.3	Details describing how the testing of the EDG automatic trips "trips defeat" feature is accomplished	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning testing methodology
ITS 3.8 LA4	4.6.1.3	"Each diesel generator shall be inspected at least once every refueling interval."	UFSAR and TRM	10 CFR 50.59	Relocation of details concerning testing methodology
ITS 3.8 LA5	4.6.1.4.a	Details describing the continuous load limits of the EDGs and restriction preventing the continuous operation of the EDGs above these limits	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning testing methodology

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 3.8 LA5	4.6.1.4.b	Details describing the short-term load limitations of the EDGs and restriction preventing the operation above this limit	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning testing methodology
ITS 3.8 LA5	4.6.1.5	Details describing how the EDG is started and synchronized to the bus in preparation for the 24 hour full load test	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning testing methodology
ITS 3.8 LA6	Table 4.1-2	Items No. 11 and 12 details of EDG fuel oil testing (tanks to which testing requirements apply)	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of descriptive details
ITS 3.8 LA7	4.6.3.2	Detail describing the precision at which the cell voltage must be determined and the requirement that the amount of water added to each cell be measured and recorded.	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning testing methodology
ITS 3.8 LA7	4.6.3.4	Requirement that when battery data is recorded, the new data shall be compared to previous data in order to detect signs of abuse or deterioration.	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning testing methodology
ITS 3.8 LA8	3.7.1.a and 3.7.1.c	Regarding 110 KV-4160 V startup transformer in service and 4160 V buses 2 and 3 energized.	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of system description details
ITS 3.8 LA9	3.7.1.b	Regarding 480 V buses E1 and 2 energized	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of system description details

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 3.8 LA10	3.7.1.e	Regarding details of the batteries and battery charger	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of system description details
ITS 3.9 LA1	3.8.1.f	Reference to specific boron concentration of 1950 ppm to be maintained during head removal or movement of fuel in the reactor	COLR	10 CFR 50.59	Relocation of values associated with requirements
ITS 3.9 LA2	Table 4.1-3 Item No. 6	Requirement to test refueling system interlocks prior to each refueling system shutdown	TRM	10 CFR 50.59	Relocation of details concerning testing not required for operability
ITS 3.9 LA3	3.10.8.3	"When the reactor is in the cold shutdown condition, the shutdown margin shall be a least 1 percent $\Delta k/k$."	COLR	10 CFR 50.59	Relocation of values associated with requirements
ITS 3.9 LA4	3.8.1.d	Requirement that whenever core geometry is being changed that the source range channels provide "continuous visual indication in the control room and one with audible indication available in the containment"	Bases	Bases Control Program in ITS Section 5.5.14	Relocation of details concerning methodology for meeting requirements
ITS 3.9 LA6	3.8.1.e	Requirement that during refueling operations, T_{ave} shall be maintained $\leq 140^\circ F$	TRM	10 CFR 50.59	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 3.9 LA7	3.8.1.h	"Movement of fuel within the core shall not be initiated prior to 100 hours after shutdown."	TRM	10 CFR 50.59	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits
ITS 3.9 R1	3.8.1.c	Requirement that during refueling operations "Radiation levels in the containment and spent fuel storage areas shall be monitored continuously."	TRM	10 CFR 50.59	Relocation, does not meet 10 CFR 50.36 criteria
ITS 3.9 R1	3.8.1.g	Requirement that whenever core geometry is being changed, direct communications between the control room and the refueling cavity manipulator crane shall be available	TRM	10 CFR 50.59	Relocation, does not meet 10 CFR 50.36 criteria
ITS 4.0 LA1	5.1	Specifics describing the location of H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 in relation to HBRSEP Unit No. 1 and the fact that Unit No. 2 is owned and operated by Carolina Power & Light Co. In addition the statement describing site exclusion boundary (per 10 CFR 100.3) as being a circle of 1400 ft radius from the reactor center line.	UFSAR	10 CFR 50.59	Relocation of details concerning location of plant

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 4.0 LA2	5.3.1.1	Specifics describing the reactor core i.e. "approximately 68 metric tons", fuel rods "which are pre pressurized," and fuel assemblies each contain "204 fuel rod locations occupied by rods consisting of natural or slightly enriched uranium pellets, solid inert materials, or a combination of the aforementioned"	UFSAR	10 CFR 50.59	Relocation of system description details
ITS 4.0 LA2	5.3.1.3	Descriptive details of reload fuel	UFSAR	10 CFR 50.59	Relocation of system description details
ITS 4.0 LA2	5.3.2.1	Design code requirements of the RCS	UFSAR	10 CFR 50.59	Relocation of system description details
ITS 4.0 LA2	5.3.2.2	Descriptive information concerning the piping and components of the RCS meet American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (B&PV) Class I requirements	UFSAR	10 CFR 50.59	Relocation of system description details
ITS 4.0 LA2	5.3.2.3	Descriptive information concerning the nominal volume of coolant contained in the RCS at rated operating conditions	UFSAR	10 CFR 50.59	Relocation of system description details

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 4.0 LA3	5.4.1	"The new and spent fuel pit structures are designed to withstand the anticipated earthquake loadings as ASME B&PV Code Class I structures. The spent fuel pit has a stainless steel liner to ensure against loss of water."	UFSAR	10 CFR 50.59	Relocation of system description details
ITS 4.0 LA3	5.4.2.1	Details describing features of the new fuel storage facilities that maintain $K_{eff} < 0.95$ assuming the racks are flooded with pure water i.e., "...additional separation is maintained by use of the storage rack secured location restrictions"..."in order to establish a geometry which ensures that..."	UFSAR	10 CFR 50.59	Relocation of system description details
ITS 4.0 LA3	5.4.2.2	Details describing features that maintain K_{eff} less than 0.95 in the spent fuel pool i.e., "a combination of nominal assembly spacing, neutron absorber material between the assemblies, and restrictions on fuel design, integral burnable absorber content, reconstitution, and storage is required to assure that..."	UFSAR	10 CFR 50.59	Relocation of system description details
ITS 4.0 LA4	5.2.1.1	Descriptive information concerning the purposes of the containment building	UFSAR	10 CFR 50.59	Relocation of system description details

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 4.0 LA4	5.2.1.2	Descriptive information concerning the design pressure ratings of the containment building	UFSAR	10 CFR 50.59	Relocation of system description details
ITS 4.0 LA4	5.2.2.1	Descriptive information concerning the design of the containment penetrations for electrical and mechanical systems	UFSAR	10 CFR 50.59	Relocation of system description details
ITS 4.0 LA4	5.2.2.2	Descriptive information concerning the Phase A and Phase B containment isolation signals and the fact that they must be capable of withstanding a single component failure and still maintain containment isolation	UFSAR	10 CFR 50.59	Relocation of system description details
ITS 4.0 LA4	5.2.3.1	Descriptive information concerning the containment spray system and its purpose	UFSAR	10 CFR 50.59	Relocation of system description details
ITS 4.0 LA4	5.2.3.2	Descriptive information concerning the containment internal air recirculation system and its heat removal capability	UFSAR	10 CFR 50.59	Relocation of system description details
ITS 4.0 LA5	5.5	Descriptive information concerning the design of the containment building, auxiliary building, ASME B&PV Code Class I turbine bay, and all contained Engineered Safety Feature (ESF) systems be designed for a maximum credible earthquake with an acceleration of 0.20 g	UFSAR	10 CFR 50.59	Relocation of system description details

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 4.0 LA6	1.19	Definition of Site Boundary and Figure 1.1-1, "Plant Site Boundary and Exclusion Zone."	UFSAR	10 CFR 50.59	Relocation of details concerning location of plant
ITS 5.0 LA1	6.5.1.1.2	Requirements concerning how safety analysis shall be prepared for all procedures, tests, and experiments covering procedures identified in TS Section 6.5.1.1.1 and procedures that affect nuclear safety	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA1	6.5.1.1.3	Requirements concerning when a second safety review shall be performed on procedures affecting nuclear safety	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA1	6.5.1.1.4	Requirements for approval of procedures that do not involve an unreviewed safety question as defined in 10 CFR 50.59 nor a change to the TS	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA1	6.5.1.1.5	Requirements concerning approval of temporary changes to procedures and the maximum time it may be in effect i.e., 21 days	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA1	6.5.1.1.6	Requirements concerning changes to procedures that constitute an unreviewed safety question, or involve a change to the TS	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 5.0 LA1	6.5.1.1.7	Requirements concerning changes which constitute a change to the facility as described in the UFSAR	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA1	6.5.1.2.1	Requirements concerning plant modifications that affect nuclear safety	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA1	6.5.1.2.2	Requirement concerning the second safety review on all modifications that affect nuclear safety	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA1	6.5.1.2.3	Requirements concerning approval of modifications that do not involve an unreviewed safety question or a change to the TS	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA1	6.5.1.2.4 & 6.5.1.2.5	Requirements concerning approval of modifications that either constitute an unreviewed safety question or a change to the TS	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA1	6.5.1.3.1	"Each proposed Technical Specification or Operating License change shall be reviewed by the Plant Nuclear Safety Committee and submitted to the NRC for approval."	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 5.0 LA1	6.5.1.4.1	Requirements concerning Technical Specification violations	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA1	6.5.1.5.1	Qualification requirements for Nuclear Safety Reviewers	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA1	6.5.1.6.1.a and b	Requirements for establishing a Plant Nuclear Safety Committee (PNSC) and the advisory role it plays to the Plant General Manager	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA1	6.5.1.6.2	Requirement for the composition of the PNSC	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA1	6.5.1.6.3	Requirements for PNSC members and alternate members	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA1	6.5.1.6.4.a and b	Definition of "quorum" as it pertains to the PNSC. Also limits the number of alternates that may compose a quorum	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA1	6.5.1.6.5	Minimum PNSC meeting requirements	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 5.0 LA1	6.5.1.6.6.a-k	Listing of activities requiring PNSC involvement	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA1	6.5.1.6.7	Required actions to be taken upon disagreement between the PNSC and actions contemplated by the Plant General Manager	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA1	6.5.1.6.8	Requirement for maintaining minutes of PNSC meetings and their minimum content	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA1	6.5.2.1	Description of the function of the Nuclear Assessment Section (NAS)	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA1	6.5.2.2.1	Qualifications of individuals for independent reviews in the NAS	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA1	6.5.2.2.2	Qualifications of the Manager-Nuclear Assessment Section	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA1	6.5.2.2.3	Qualifications of individuals performing independent safety reviews	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 5.0 LA1	6.5.2.2.4	Actions to be taken when sufficient expertise does not exist within the NAS. Also allows an individual to be "competent" in more than one specialty	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA1	6.5.2.2.5	Qualifications for individuals performing reviews of documents submitted under TS Section 6.5.2.3	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA1	6.5.2.2.6	Requirements for independent safety reviews in NAS	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA1	6.5.2.2.7 procedures	Requirement that the NAS Independent Safety Review Program be conducted in accordance with written, approved procedures	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA1	6.5.2.3 a-e	Listing of items in which the NAS shall perform reviews	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA1	6.5.2.4	"Results of Nuclear Assessment Section independent safety reviews shall be documented and retained."	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 5.0 LA2	6.2.1.e	Requirement that the health physics manager have access to the overall unit manager and the health physics technician's "stop work" authority	UFSAR	10 CFR 50.59	Relocation of administrative details
ITS 5.0 LA3	6.2.3.h	Restriction that minimum shift manning requirements cannot be used to justify adequate shift complement upon shift relief when a required member is not available for relief	UFSAR	10 CFR 50.59	Relocation of administrative details
ITS 5.0 LA4	6.5.1.1.1.j	Reference to Regulatory Guide 4.15, Dec. 1977 with regard to the Quality Assurance Program	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA6	4.4.3.a-h	Requirement to perform leakage testing and inspections of the Post Accident Recirculation Heat Removal System and the applicable acceptance criteria. Additional requirement to perform repairs as necessary to maintain leakage within the stated criteria	TRM	10 CFR 50.59	Relocation of details concerning testing methodology
ITS 5.0 LA7	4.4.4.1	Requirement to inspect containment surveillance tendons	TRM	10 CFR 50.59	Relocation of details concerning testing methodology
ITS 5.0 LA7	4.4.4.3.a	Details describing analysis to be performed on Containment Surveillance Tendons	TRM	10 CFR 50.59	Relocation of details concerning testing methodology

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 5.0 LA8	4.2.3	Requirement to perform reactor coolant pump flywheel inspections	Inservice Inspection Program	10 CFR 50.59	Relocation of details concerning testing methodology
ITS 5.0 LA9	3.8.2.c	Requirement that the spent fuel building and containment building filter fans shall be shown to operate within $\pm 10\%$ of design flow	TRM	10 CFR 50.59	Relocation of details concerning testing methodology
ITS 5.0 LA9	4.15.d	Requirement that the control room filtration system be tested following any structural maintenance on the filter housings or following painting, fire, or chemical release in the Control Room envelope	TRM	10 CFR 50.59	Relocation of details associated with post maintenance testing to declare operability
ITS 5.0 LA9	4.15.f	Requirement that the Control Room filtration system be tested every 18 months	TRM	10 CFR 50.59	Relocation of details concerning testing methodology
ITS 5.0 LA9	4.15.g	Requirement that the Control Room filtration system HEPA filters be tested after complete or partial replacement and associated test conditions	TRM	10 CFR 50.59	Relocation of details associated with post maintenance testing to declare operability
ITS 5.0 LA9	4.15.h	Requirement that the Control Room filtration system charcoal filters be tested after each partial or complete replacement and associated test conditions	TRM	10 CFR 50.59	Relocation of details associated with post maintenance testing to declare operability

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 5.0 LA9	4.12	Refueling filter systems Applicability and Objective	TRM	10 CFR 50.59	Relocation of descriptive details
ITS 5.0 LA9	4.12.1	Requirement that the Refueling Filter System be demonstrated operable every operating cycle	TRM	10 CFR 50.59	Relocation of descriptive details
ITS 5.0 LA9	4.12.2.a	Requirement that the Refueling Filter System be tested initially, and at least once per operating cycle prior to each refueling outage or after 720 hours of system operation whichever comes first	TRM	10 CFR 50.59	Relocation of details concerning testing methodology
ITS 5.0 LA9	4.12.2.b-e	Details concerning how the Refueling System filtration system is to be tested and what tests are to be performed	TRM	10 CFR 50.59	Relocation of details concerning testing methodology
ITS 5.0 LA10	3.16.2.1	Restriction on the quantity of radioactive material contained in the listed tanks shall be limited at all times	TRM	10 CFR 50.59	Relocation of details concerning methodology for meeting requirements
ITS 5.0 LA10	3.16.2.2	Requirement that when the quantity of radioactive material in any listed tank exceeds the limit, suspend all additions to the tank, and take actions to reduce the amount of radioactive material in the tank to within limits within 48 hours	TRM	10 CFR 50.59	Relocation of details concerning methodology for meeting requirements

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 5.0 LA10	3.16.2.3	Requirement that if the radioactive content of any of the listed tanks cannot be reduced to within limits within 48 hours then the NRC shall be notified in accordance with TS Section 6.6	TRM	10 CFR 50.59	Relocation of reporting requirements
ITS 5.0 LA10	3.16.2.1.f	Definition of "Temporary Tank" as it applies to TS Section	TRM	10 CFR 50.59	Relocation of descriptive details
ITS 5.0 LA10	3.16.4.1	Restrictions on hydrogen and oxygen content in the Waste Gas Decay Tanks	TRM	10 CFR 50.59	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits
ITS 5.0 LA10	3.16.4.1.a	Actions to be taken when oxygen or hydrogen concentration in the Waste Gas Decay Tanks exceeds limits	TRM	10 CFR 50.59	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits
ITS 5.0 LA10	3.16.4.1.b	Actions to be taken when oxygen and hydrogen concentration in the Waste Gas Decay Tanks exceeds limits	TRM	10 CFR 50.59	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits
ITS 5.0 LA10	3.16.4.2	Reporting requirements for oxygen and/or hydrogen being out of specification in the Waste Gas Decay Tank(s) for ≥ 48 hours	TRM	10 CFR 50.59	Relocation of reporting requirements

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 5.0 LA10	3.16.4.3	Reporting requirements for condition where actions required to be taken by TS do not result in returning the hydrogen or oxygen concentration in the Waste Gas Decay Tank(s) to $\leq 6\%$ within 24 hours	TRM	10 CFR 50.59	Relocation of reporting requirements
ITS 5.0 LA10	3.16.5.1	Limitation on the amount of radioactive material that may be stored in any one Waste Gas Decay Tank shall be limited to $\leq 1.9 \text{ E} + 4$ curies noble gas (considered as Xe-133)	TRM	10 CFR 50.59	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits
ITS 5.0 LA10	3.16.5.2	Requirement to suspend all additions to any Waste Gas Decay Tank that exceeds the limit in TS Section 3.16.5.1 and within 48 hours reduce the tank contents to within limits	TRM	10 CFR 50.59	Relocation of detailed requirements relating to systems not required for operability or to maintain required limits
ITS 5.0 LA10	3.16.5.3	Reporting requirements if the Waste Gas Decay Tank contents are not reduced to within limits within the time period allowed by TS Section 3.16.5.2	TRM	10 CFR 50.59	Relocation of reporting requirements
ITS 5.0 LA10	4.20.2	Note specifying which tanks are to be included in limitations dictated by TS Section 4.20.2.1	TRM	Bases Control Program in ITS Section 5.5.14	Relocation of system description details

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 5.0 LA10	4.20.2.1	Requirement to verify the radioactive material content of tanks listed in TS Section 3.16.2.1 by sampling	TRM	10 CFR 50.59	Relocation of detailed testing requirements relating to systems not required for operability or to maintain required limits
ITS 5.0 LA10	4.20.4.1	Requirement to verify the hydrogen and oxygen concentration in the Waste Gas Decay Tanks to be within limits by monitoring contents with hydrogen and oxygen monitors or sampling	TRM	10 CFR 50.59	Relocation of detailed testing requirements relating to systems not required for operability or to maintain required limits
ITS 5.0 LA10	4.20.5.1	Requirement to sample the contents of the Waste Gas Decay Tanks every 24 hours when Reactor Coolant Activity is ≥ 100 uCi/ml	TRM	10 CFR 50.59	Relocation of detailed testing requirements relating to systems not required for operability or to maintain required limits
ITS 5.0 LA11	6.9.1.4,	Details of format of Monthly Operating Report	TRM	10 CFR 50.59	Relocation of reporting requirements
ITS 5.0 LA12	6.5.3.1	Requirement to perform certain types of assessments at a frequency not to exceed 24 months, by the NAS as listed in TS Sections 6.5.3.1 a-h	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 5.0 LA12	6.5.3.2	Requirement for the NAS to perform assessments in accordance with the Code of Federal Regulations specifically in the areas of Emergency Preparedness, Security, and Radiation Protection	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA12	6.5.4.1 & 6.5.4.2	Requirements for independent fire protection and loss prevention inspection and audit	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA1	6.6.1.b) & 6.6.2.b)	Review requirements associated with reportable events	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA13	6.9.1.1	Reporting requirements for plant startup and power escalation	TRM	10 CFR 50.59	Relocation of reporting requirements
ITS 5.0 LA14	6.9.1.3.7	Reporting and approval requirements for changes to the radioactive waste systems	ODCM	ODCM in ITS Section 5.5.1	Relocation of reporting requirements Relocation of administrative details
ITS 5.0 LA14	6.17.1.1	Reporting requirements for major changes to the radioactive liquid, gaseous, or solid waste treatment systems. Includes allowance that licensee may submit the required information as part of the next UFSAR Update	ODCM	ODCM in ITS Section 5.5.1	Relocation of reporting requirements

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 5.0 LA14	6.17.1.2	Major changes to radioactive waste process systems shall become effective upon review and approval by the PNSC	ODCM	ODCM in ITS Section 5.5.1	Relocation of administrative details
ITS 5.0 LA15	6.9.3.3.b	Listing of TS requirements applicable to each listed methodology as they pertain to determining core operating limits	COLR	10 CFR 50.59	Relocation of administrative details
ITS 5.0 LA16	6.9.3.2	Requirement to generate written reports for the listed special radiological effluent reports listed and submit to the NRC within 30 days of the occurrence or event	ODCM	10 CFR 50.59	Relocation of reporting requirements
ITS 5.0 LA17	1.15	Requirements for the Process Control Program (PCP) to assure compliance with 10 CFR 20, 10 CFR 17, and Federal and State regulations	TRM	10 CFR 50.59	Relocation of administrative details
ITS 5.0 LA17	6.15.1	Requirement that the PCP shall be approved by the NRC prior to implementation	TRM	10 CFR 50.59	Relocation of administrative details
ITS 5.0 LA17	6.15.2	Reporting and approval requirements for changes to the PCP	TRM	10 CFR 50.59	Relocation of reporting requirements Relocation of administrative details

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 5.0 LA18	6.4.1	Requirements for a requalification and replacement training program for the plant staff that shall meet the requirements of Sec. 5.5 of ANSI N18.1-1971 and 10 CFR 55, Appendix A	UFSAR	10 CFR 50.59	Relocation of administrative details
ITS 5.0 LA19	6.10.1.a-i	Listing of facility records that must be retained for at least five years	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA19	6.10.2.a-m	Listing of facility records that must be retained for the duration of the facility operating license	Quality Assurance Program Description (UFSAR Section 17.3)	10 CFR 50.54(a)	Relocation of administrative details
ITS 5.0 LA20	6.11	Requirement that procedures for personnel radiation protection for the Radiation Protection Program be prepared consistent with the requirements of 10 CFR 20 and that they be approved, maintained, and adhered to for all operations involving personnel radiation exposure	UFSAR	10 CFR 50.59	Relocation of administrative details

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ITS	CTS	Description	General Location	Change Controls	Characterization
ITS 5.0 LA21	6.1.1, 6.5.1.1.4, 6.5.1.2.3, 6.2.1(b), 6.2.3, 6.3.1, 6.16.2, 6.13.1, and 6.13.2, With respect to detailed plant organization titles	Detailed plant organization titles	UFSAR	10 CFR 50.59	Relocation of administrative details
ITS 5.0 LA22	6.9.1.2, 6.9.1.2.3, and 6.9.1.3, With regard to reporting requirements for radiological effluents	Reporting requirements for radiological effluents	ODCM	10 CFR 50.59	Relocation of reporting requirements
ITS 5.0 LA23	6.9.3.3.a With regard to mathematical terms utilized in the COLR	Mathematical terms utilized in the COLR	COLR	10 CFR 50.59	Relocation of descriptive details

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CTS	Description	General Location	Change Controls	Characterization
3.1.1.4.A	Requirement that when the RCS temperature is > 200°F RCS vent paths from the reactor vessel head and pressurizer steam space shall be operable	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria
3.1.1.4.B	Requirement that when the RCS temperature is > 200°F, valves RC-571 and 572 shall be closed with the allowance that the valves may be cycled periodically in order to depressurize the vent system should the system pressurize due to "root" valve leak-by	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria
3.1.1.4.C.1	"With the Reactor Vessel Head vent path inoperable, restore the vent path to operable status within 30 days or be in Hot Shutdown within 6 hours and Cold Shutdown within the following 30 hours."	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria
3.1.1.4.C.2	Reporting requirement that with the Pressurizer steam space vent inoperable, restore it to operable status within 30 days or prepare and submit a special report to the NRC within the following 14 days detailing the cause of the inoperability and the action being taken to restore operability	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria
3.1.6.1	"The concentration of oxygen in the reactor coolant shall not exceed 0.1 ppm when the reactor coolant temperature exceeds 250°F."	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria
3.1.6.2	"The concentration of chloride in the reactor coolant shall not exceed 0.15 ppm when the reactor coolant temperature exceeds 250°F."	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria

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CTS	Description	General Location	Change Controls	Characterization
3.1.6.3	Requirement that if out of specification reactor coolant oxygen or chloride concentration cannot be restored to within specifications within 24 hours the unit shall be placed in the cold shutdown condition using normal operating procedures	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria
3.1.2.2	"The secondary side of the steam generator must not be pressurized above 200 psig if the temperature of the vessel is below 120°F."	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria
3.1.2.3	"The pressurizer shall neither exceed a maximum heatup rate of 100°F/hr nor a cooldown rate of 200°F/hr. The spray shall not be used if the temperature difference between the pressurizer and the spray fluid is greater than 320°F."	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria
3.5.2.1	Requirement that the equipment listed in TS Table 3.5-6 shall be operable with their alarm/trip setpoints set in accordance with the ODCM	ODCM	ODCM in ITS Section 5.5.1	Radiological Effluent Technical Specifications (RETS) relocation, does not meet 10 CFR 50.36 criteria
3.5.2.2	Requirement that with the channel setpoint less conservative than that required in TS Section 3.5.2.1, immediately suspend releases via the associated pathway and restore the channel setpoint to that required by the ODCM or declare the channel inoperable	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria

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CTS	Description	General Location	Change Controls	Characterization
3.5.2.3	"With less than the minimum number of radioactive liquid effluent monitoring instrumentation operable, take the action shown in Table 3.5-6."	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.5.2.4	"The provisions of the Specification 3.0 are not applicable."	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.5.3.1	Requirement that the equipment listed in TS Table 3.5-7 shall be operable with their alarm/trip setpoints set in accordance with the ODCM	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.5.3.2	Requirement that with the channel setpoint less conservative than that required in TS Section 3.5.3.1, immediately suspend releases via the associated pathway and restore the channel setpoint to that required by the ODCM or declare the channel inoperable	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.5.3.3	"With less than the minimum number of radioactive gaseous effluent monitoring instrumentation operable, take the action shown in Table 3.5-6."	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.5.3.4	"The provisions of the Specification 3.0 are not applicable."	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria

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CTS	Description	General Location	Change Controls	Characterization
Table 3.5-6	"Radioactive Liquid Effluent Monitoring Instrumentation," which lists those monitors required to monitor the various liquid radioactive release pathways and the required actions to be taken when the monitoring channel is inoperable. The table also provides the necessary compensatory action that must be taken if it is desired to maintain the release via the pathway with the associated monitor inoperable.	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
Table 3.5-7	"Radioactive Gaseous Effluent Monitoring Instrumentation," which lists those monitors required to monitor the various gaseous radioactive release pathways and the required actions to be taken when the monitoring channel is inoperable. The table also provides the necessary compensatory action that must be taken if it is desired to maintain the release via the pathway with the associated monitor inoperable.	ODCM TRM	ODCM in ITS Section 5.5.1 10 CFR 50.59 for TRM	RETS relocation, does not meet 10 CFR 50.36 criteria
3.8.3	Requirements for spent fuel rod water temperature	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria
3.8.4	Spent fuel cask handling crane requirements	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria

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CTS	Description	General Location	Change Controls	Characterization
3.9.1.1	Requirement that the concentration of radioactive material in liquid effluents released at any time from the site to unrestricted areas shall be limited to the concentrations specified in 10 CFR 20, App. B, Table II, Column 2 for radionuclides other than dissolved or entrained noble gases. For dissolved or entrained noble gases, the concentration shall be limited to 2×10^{-4} uCi/ml total activity.	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.9.1.2	Requirement, with the concentration of liquid effluents in excess of that allowed by TS Section 3.9.1.1, without delay to restore the concentration to within limits and notify the NRC in accordance with TS Section 6.6.	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.9.1.3	Requirement that in the event the requirements of TS Section 3.9.1.2 cannot be met the unit shall be placed in the hot shutdown condition.	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.9.1.4	"The provisions of Specification 3.0 are not applicable."	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.9.2.1	Requirement that the dose commitment at all times to a member of the public from radioactive materials in liquid effluents released to unrestricted areas shall be limited as stated in (a) and (b)	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.9.2.2	"With the calculated dose commitment from the release of radioactive materials in liquid effluents exceeding any of the limits prescribed by Specification 3.9.2.1 above, prepare and submit a report to the Commission in accordance with Specification 6.9.3.2."	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria

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CTS	Description	General Location	Change Controls	Characterization
3.9.3.1	Requirement that the dose rate at all times to a member of the public from radioactive materials in gaseous effluents released from the site boundary shall be limited as stated in (a) and (b)	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.9.3.2	"With the dose rate(s) exceeding the above limits, without delay decrease the release rate to within the above limits. In addition, a notification must be made to the Commission in accordance with Specification 6.6."	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.9.3.3	Requirement that in the event the requirements of TS Section 3.9.3.2 cannot be met the unit shall be placed in the hot shutdown condition	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.9.4.1	Requirement that the air dose commitment due to radionoble gases released in gaseous effluents to areas at and beyond the site boundary shall be limited as stated in (a) and (b)	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.9.4.2	Requirement that with the limits of TS Section 3.9.4.1 exceeded, prepare and submit a report to the NRC in accordance with TS Section 6.9.3.2	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.9.5.1	Requirement that the dose to the public from I-131, I-133, tritium, and radioactive materials in particulate form, with half-lives greater than eight (8) days be limited in accordance with limits stated in (a) and (b)	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria

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CTS	Description	General Location	Change Controls	Characterization
3.9.5.2	Requirement that with the limits of TS Section 3.9.5.1 exceeded, prepare and submit a report to the NRC in accordance with TS Section 6.9.3.2	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.9.6.1	Requirement that the dose commitment to any member of the public, due to releases of licensed materials and radiation, from uranium fuel cycle sources shall be limited to ≤ 25 mrem to the total body or any organ except the thyroid, which shall be limited to ≤ 75 mrem over 12 consecutive months	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.9.6.2	Reporting and analysis requirements when any of the limits stated in TS Sections 3.9.2.1.a or b, 3.9.4.1.a or b, or 3.9.5.1.a or b are exceeded by a factor of 2	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.9.6.3	"The provisions of Specification 3.0 are not applicable."	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.11.1	"A minimum of 15 total accessible thimbles and at least 2 per quadrant sufficient movable in-core detectors shall be operable during recalibration of the excore symmetrical offset detection system."	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria
3.11.2	"Power shall be limited to 90% of rated power if recalibration requirements for the excore symmetrical offset detection system identified in Table 4.1-1 are not met."	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria

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CTS	Description	General Location	Change Controls	Characterization
3.16.1.1	Requirement that the radioactive liquid waste system be utilized to minimize offsite doses due to releases of liquid radioactive effluents	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.16.1.2	Requirement that with liquid wastes being discharged without treatment while in excess of the limits in TS Section 3.16.1.1, prepare and submit a report to the NRC in accordance with TS Section 6.9.3.2.b	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.16.3.1	Requirement that the radioactive gaseous waste system be utilized to minimize offsite doses due to releases of liquid radioactive effluents	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.16.3.2	Requirement that with the gaseous waste treatment system inoperable and gaseous releases in excess of the limits in 3.16.3.1, prepare and submit a special TS Section report to the NRC in accordance with TS Section 6.9.3.2.b	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.16.6.1	"The Solid Radioactive System shall be used in accordance with a Process Control Program (PCP) to process wet radioactive waste to meet shipping and burial ground requirements."	TRM	10 CFR 50.59	RETS relocation, does not meet 10 CFR 50.36 criteria
3.16.6.2	"With the provisions of the PCP not satisfied, suspend shipments of defectively processed or defectively packaged solid radioactive waste from the site."	TRM	10 CFR 50.59	RETS relocation, does not meet 10 CFR 50.36 criteria

RELOCATED SPECIFICATIONS MATRIX

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CTS	Description	General Location	Change Controls	Characterization
3.16.6.3	Requirement that if a test specimen fails to verify solidification, the solidification of the batch under test shall be suspended until such time as additional test specimens can be obtained, alternative solidification parameters can be determined in accordance with the PCP, and a subsequent test verifies solidification	TRM	10 CFR 50.59	RETS relocation, does not meet 10 CFR 50.36 criteria
3.17.1.1	"The Radiological Environmental Monitoring Program shall be conducted as specified in Table 3.17-1."	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.17.1.2	Actions to be taken when the Radiological Environmental Monitoring Program is not in accordance with TS Section 3.17-1	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.17.1.3	Actions to be taken when the level of radioactivity in plant effluents as indicated by environmental sampling is greater than the reporting levels of TS Table 3.17-2	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.17.1.4	Requirement to obtain replacement samples of milk and leafy vegetables when the sample locations specified in TS Table 3.17-1 cannot be obtained	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.17.1.5	"The provisions of Specification 3.0 are not applicable."	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria

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CTS	Description	General Location	Change Controls	Characterization
3.17.1.6	Allowance for deviations from the required environmental sampling schedule	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.17.2.1	Requirement to perform a land use census and related content	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.17.2.2	Reporting requirement for land use census that identifies doses greater than the values currently being calculated in TS Section 4.10.4.1	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.17.2.3.a-c	Actions to be taken when the land use census identifies a location which yields an annual calculated dose or dose commitment of a specific pathway which is 20% greater than that at a current sampling location	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
3.17.3.1, 2, 3, and 4	Requirement for analyses supplied by U. S. Environmental Protection Agency (EPA) as a part of Interlaboratory Comparison Program	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
Table 3.17-1	Table and associated notation describing the Radiological Environmental Monitoring Program	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
Table 3.17-2	Table describing reporting levels for radioactivity concentrations in environmental samples	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria

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CTS	Description	General Location	Change Controls	Characterization
Table 3.17-3	Table with maximum values for LLDs	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
Table 4.1-1, Item 45	Requirement for testing high point vents	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria
4.10.1.1	Sampling requirements for batch liquid releases	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
4.10.1.2	Analysis requirements for samples of batch liquid releases	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
4.10.1.3	Requirement that liquid batch samples be taken and analyzed in accordance with TS Table 4.10-1. Requirement that the concentrations at the point of release be within the limits of TS Section 3.9.1.1	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
4.10.2.1	Requirement for determining the dose rate due to radioactive materials in gaseous effluents to be within the limits of TS Section 3.9.3.1 by performing sampling and analysis in accordance with Table 4.10-2	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
4.10.3.1	"Cumulative dose commitments for the current calendar quarter and current calendar year shall be determined in accordance with the ODCM once per 31 days."	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria

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CTS	Description	General Location	Change Controls	Characterization
4.10.4.1	Requirement to determine cumulative dose contributions for the current quarter and current calendar year for I-131, I-133, tritium, and radionuclides in particulate form with half lives greater than 8 days	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
4.10.5.1	Requirement to determine cumulative dose contributions from liquid and gaseous effluents in accordance with TS Sections 3.9.2.1, 3.9.4.1, and 3.9.5.1	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
4.10.5.2	Requirement to determine cumulative dose contributions from direct radiation from the reactor unit and from radwaste storage tanks as set forth in the applicability of TS Section 3.9.6.2	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
Table 4.10-1	Table and associated notation describing the Radioactive Liquid Waste Sampling and Analysis Program	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
Table 4.10-2	Table and associated notation describing the Radioactive Gaseous Waste Sampling and Analysis Program	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
4.16	Requirements for Radioactive Source Leakage Testing	TRM	10 CFR 50.59	Does not meet 10 CFR 50.36 criteria
4.19.1.1	Requirement to perform radioactive liquid effluent monitoring instrumentation operability surveillances in accordance with TS Table 4.19-1	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria

RELOCATED SPECIFICATIONS MATRIX

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CTS	Description	General Location	Change Controls	Characterization
4.19.2.1	Requirement to perform radioactive gaseous effluent monitoring instrumentation operability surveillances in accordance with TS Table 4.19-2	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
Table 4.19-1	Table and associated notation describing the radioactive liquid effluent monitoring instrumentation surveillance requirements	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
Table 4.19-2	Table and associated notation describing the radioactive gaseous effluent monitoring instrumentation surveillance requirements	ODCM TRM	ODCM in ITS Section 5.5.1 10 CFR 50.59 for TRM	RETS relocation, does not meet 10 CFR 50.36 criteria
4.20.1.1	Requirements to perform projected dose commitments at least every 31 days to ensure the requirements of TS Section 3.16.1.1 are satisfied when the Liquid Radwaste Treatment System is not used	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
4.20.3.1	Requirements to perform projected dose commitments for gaseous releases at least every 31 days to ensure the requirements of TS Section 3.16.3.1 are satisfied	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
4.20.6.1	"The PCP shall be used to verify the solidification of one representative test specimen from every tenth batch of wet radioactive waste."	TRM	10 CFR 50.59	RETS relocation, does not meet 10 CFR 50.36 criteria
4.20.6.2	Actions to be taken when a test specimen from a batch of waste fails to verify solidification	TRM	10 CFR 50.59	RETS relocation, does not meet 10 CFR 50.36 criteria

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CTS	Description	General Location	Change Controls	Characterization
4.21.1.1	Requirement to collect environmental samples in accordance with TS Table 3.17-1 and analyze them in accordance with TS Tables 3.17-2 and 3.17-3	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
4.21.2.1	Specification of how the land use census shall be conducted	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
4.21.3.1	Requirement to perform analyses as part of the EPA Interlaboratory Comparison Program	ODCM	ODCM in ITS Section 5.5.1	RETS relocation, does not meet 10 CFR 50.36 criteria
TS Appendix B	"Radioactive Effluent Releases" requirement to report on a monthly basis the quantities of radioactive effluents released from the plant	ODCM	ODCM in ITS Section 5.5.1	Does not meet 10 CFR 50.36 criteria

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
TECHNICAL SPECIFICATIONS CHANGE REQUEST TO CONVERT TO THE
IMPROVED STANDARD TECHNICAL SPECIFICATIONS

DETAILED DESCRIPTION OF SUPPLEMENT 8

The purpose of Supplement 8 is discussed in the paragraphs below arranged in order of Improved Technical Specifications (ITS) section.

A review of the final typed Improved Technical Specifications (ITS) was conducted against the markup of NUREG-1431, "Standard Technical Specifications - Westinghouse Plants," Revision 1. The review was to assure that all proposed changes to the Technical Specifications had been reflected in the final typed copy. Changes listed below that originated as a result of this review are identified by an asterisk (*).

The incorporation of page changes to Discussion of Changes (DOCs) for Sections 3.4, "Reactor Coolant System," and 3.5, "Emergency Core Cooling System (ECCS)," in recent supplements resulted in inadvertent loss of text when inserting changed pages. DOC pages 29 through 38 for ITS Section 3.4 and DOC pages 6a through 9 for ITS Section 3.5 are included to provide complete information.

LCO 3.1.3, "Moderator Temperature Coefficient (MTC)"

DOC "L2" for ITS 3.1.3 was revised to provide technical justification for the 24 hour Allowed Outage Time for when MTC is not within the upper limit.

LCO 3.1.4, "Rod Group Alignment Limits"

*Surveillance Requirement (SR) 3.1.4.1 had been originally proposed with a Frequency of 12 hours. NUREG-1431 also includes a Frequency of "Once within 4 hours and every 4 hours thereafter when the rod position deviation monitor is inoperable." The second frequency had been proposed to be removed in accordance with a proposed generic change to NUREG-1431 which was being reviewed by the NRC. When the NRC rejected the proposed GENERIC change, the Frequency of "Once within 4 hours and every 4 hours thereafter when the rod position deviation monitor is inoperable" was restored to the markup but not typed in a previous supplement. Supplement 8 includes the necessary markup of the Current Technical Specifications, Discussion of Change "L8", and No Significant Hazards Consideration information to justify the change to CTS.

LCO 3.1.7, "Rod Position Indication"

The ITS originally proposed a Completion Time of 6 hours to verify the position of rods with inoperable position indicators by using movable incore detectors when one or more rods with

inoperable position indicators have been moved in excess of 24 steps in one direction since the last determination of the rod's position. The Completion Time was reduced to 4 hours to be consistent with NUREG-1431. A reference in DOC "L6" to LCO 3.1.4 was corrected to LCO 3.1.7.

LCO 3.1.8, "Physics Tests Exceptions-MODE 2"

The markup to LCO 3.1.8 was edited to place the "and" at the correct location of the second to last item in the list (i.e., after item "b").

LCO 3.2.4, "QUADRANT POWER TILT RATIO (QPTR)"

*The Bases were corrected to insert the word "and" instead of "or."

LCO 3.3.1, "Reactor Protection System Instrumentation," LCO 3.3.2, "Engineered Safety Features Actuation System (ESFAS) Instrumentation," and LCO 3.3.8, "Auxiliary Feedwater (AFW) System Instrumentation"

A concern was identified regarding implementation of the Company Setpoint Methodology Procedure in the instrumentation tables. Specifically, the Allowable Values bound the Limiting Safety System Setting, the Trip Setpoints are actually Nominal Trip Setpoints, and "as found" trip setpoints are OPERABLE when found more conservative than the allowable value but less conservative than the listed trip setpoints. To accommodate the Company Setpoint Methodology Procedure, the following changes were made.

The Trip Setpoint column in the instrumentation tables was renamed "Nominal Trip Setpoint." A footnote was added to the instrumentation tables stating, "A channel is OPERABLE with an actual Trip Setpoint value found outside its calibration tolerance band provided the Trip Setpoint value is conservative with respect to its associated Allowable Value and the channel is re-adjusted to within the established calibration tolerance band of the Nominal Trip Setpoint." Additional footnotes were added to Table 3.3.1-1 that allowed the Nominal Trip Setpoint as listed to be reduced as required by certain Required Actions.

Footnote (a) to Table 3.3.1-1 was clarified to state, "Rod Control System capable of rod withdrawal, or one or more rods not fully inserted."

The bases were revised to state that the Limiting Safety System Setting (LSSS) is the allowable value. Bases were added for the footnotes.

A note was added to SR 3.3.1.5 which allows the surveillance to not be performed for source range logic testing until 4 hours after entry into MODE 3 from MODE 2. Table 3.3.1-1 Function 20 was revised to add a new note to MODE 1 applicability that exempts the source range logic inputs from applicability above the P-6 interlocks. The source range logic inputs

cannot be tested without energizing the source range instruments or by use of lifted leads and jumpers. The design of the source range is different than NUREG-1431 in this respect.

The intermediate range Allowable Value was changed to 37.02% RTP in accordance with the Company Setpoint Methodology.

Minor editorial changes were made to the bases.

LCO 3.3.2, "Engineered Safety Features Actuation System (ESFAS) Instrumentation"

Discussions were added to justify a 12 hour Allowed Outage Time in Limiting Conditions for Operations (LCO) 3.3.2 Required Actions C and G for a single train of ESFAS which summarizes the basis for repair times which are different than NUREG-1431.

LCO 3.3.3, "Post Accident Monitoring (PAM) Instrumentation"

The markup of Note 4 to CTS Table 3.5-5, "Instrumentation to Follow the Course of an Accident," page 3.5-19a for ITS LCO 3.3.3 was corrected to reference the ITS actions and Discussion of Change L22.

LCO 3.3.5, "LOP DG Start Instrumentation"

In response to a comment that the setpoint in SR 3.3.5.2 is neither a Nominal Trip Setpoint nor a setpoint tolerance (i.e., this setpoint is not developed in accordance with the Company Setpoint Methodology Procedure), "setpoint tolerance" in the text to SR 3.3.5.2 was revised to "Trip Setpoint."

A note to Required Action B.1 which allowed an inoperable channel to be bypassed for up to 4 hours for surveillance testing of other channels was deleted as unnecessary. The only installed bypass capability is to bypass all the channels at once (i.e., the entire function is bypassed). In this condition, entry into the Required Actions for the associated Diesel Generator is required. Therefore, the note provides no relief from entry into Required Action B.1.

LCO 3.3.8, "Auxiliary Feedwater (AFW) System Instrumentation"

Function 3 of Table 3.3.8-1, "Loss of Offsite Power," Allowable Value column, was modified to be "NA" and the trip setpoint was modified by the setpoint value "10%." Note (a) was deleted as no longer necessary. This is consistent with the other changes to the instrumentation tables listed above and the fact that these instruments do not have setpoints derived in accordance with the Company Setpoint Methodology Procedure.

The Bases to Section 3.3.8, "Auxiliary Feedwater" were revised to include a discussion of the Company Setpoint Methodology. This information was inadvertently omitted in previous submittal information.

The bases for the Loss of Offsite Power function were revised to discuss the trip logic.

LCO 3.3.8 Required Action D.1 was corrected to delete the word "train."

LCO 3.4.12, "Low Temperature Overpressure Protection (LTOP) System"

Consistent with the changes made to LCOs 3.3.1, 3.3.2, and 3.3.8, the Trip Setpoint for LTOP was renamed "Nominal Trip Setpoint." A parenthetical sentence was added to the LCO stating, "PORVS with lift settings found between CHANNEL CALIBRATIONS, greater than the nominal lift setting but less than the allowable value are OPERABLE." Bases were revised accordingly.

LCO 3.4.13, "RCS Operational LEAKAGE"

*The Bases to SR 3.4.13.1 were corrected to add the text, "during steady state operation."

LCO 3.4.17, "Chemical and Volume Control System"

The allowed outage time for one Makeup Water Pathway from the Refueling Water Storage Tank (RWST) inoperable was changed from 72 hours to the current licensing basis of 24 hours, and DOC "L23" was revised accordingly. This change is acceptable since an inoperable Makeup Water Pathway allowed outage time should be consistent with the charging pumps in order to avoid the need for cascading.

The discussion of Applicable Safety Analyses was revised to incorporate editorial changes relating to description of Individual Plant Examination (IPE) terminology.

LCO 3.5.2, "ECCS-Operating"

The Frequency for SR 3.5.2.3 was revised from 18 months to "In Accordance With the IST Program." The Bases discussion for Frequency was also revised accordingly. A statement was added to the bases that clarified verification of the acceptance criteria was performed by comparing the test results to the pump curve.

The markup of NUREG-1431 page 3.5-4 was corrected in Note 1 to mark out the word "both."

LCO 3.5.3, "ECCS-Shutdown"

The bases discussion of operability for ITS LCO 3.5.3 was revised to make the discussion consistent with the requirements of SR 3.5.3.1. Because SR 3.5.3.1 requires performance of Inservice Testing (IST) of pumps and performance of a surveillance for the sump screens, the bases operability discussion should reflect these requirements. In particular, the Residual Heat Removal (RHR) subsystem aligned to the decay heat removal mode is not immediately available for the Emergency Core Cooling System (ECCS) function. The RHR subsystem is aligned manually for ECCS mode in the event of a Loss-of-Coolant Accident.

LCO 3.6.1, "Containment"

*SR 3.6.1.3 was corrected to add "Type A" as a modifier to leakage testing.

*The Bases to SR 3.6.1.1 were corrected to clarify that the 0.6 L_a requirement applies to the leakage which exists after the first startup after the leakage test was performed.

LCO 3.6.2, "Containment Air Lock"

*The bases to SR 3.6.3.1 were corrected to include Reference 1 (i.e., 10 CFR 50, Appendix J) and to add that SR 3.0.2 does not apply to this surveillance.

LCO 3.6.3, "Containment Isolation Valves"

SR 3.6.3.1, states that the purge supply and exhaust valves be verified closed, ". . . except when the valves are open for pressure control, ALARA or air quality considerations for personnel entry, or for surveillances that require the valves to be open," which is consistent with NUREG-1431. The current licensing basis states that the valves may be opened only for safety related reasons including operational testing and surveillances. The current licensing basis is less restrictive than NUREG-1431 because the valves currently are allowed to be opened to control containment temperature when containment temperature is near the limit of 120°F. While maintaining containment air temperature below 120°F is permissible as a safety related reason, SR 3.6.3.1 would only permit opening the valves under such conditions if a personnel entry was anticipated or in progress. Therefore, to maintain our current licensing basis, SR 3.6.3.1 was restated as follows, ". . . except when the valves are open for safety related reasons, or for tests or surveillances that require the valves to be open." The bases were revised to include examples of safety related reasons as stated in SR 3.6.3.1 of NUREG-1431 and include opening of the valves for containment air temperature control.

*The Frequency for SR 3.6.3.2 was corrected to refer to "manual" valves since the surveillance requirement only applies to manual valves.

*Minor editorial corrections were made to the bases for Required Actions D.1 and D.2.

The markup of NUREG-1431 for page B 3.6-30 has been corrected to reference Justification for Difference 5 to the bases insert B 3.6.3-1. The markup of NUREG-1431 for page B 3.6-33 was corrected to remove a reference to deleted Insert B 3.6.3-7A.

LCO 3.6.7, "Spray Additive System"

*References to additive system were corrected to Spray Additive System. The word "train" was added to Condition A.

LCO 3.7.1, "Main Steam Safety Valves (MSSVs)"

*Condition C was corrected to state one or more steam generators with greater than or equal to 3 MSSVs inoperable.

LCO 3.7.2, "Main Steam Isolation Valves (MSIVs)"

*The allowed outage time for Required Action C.1 was corrected from 24 hours to 8 hours.

LCO 3.7.4 "AFW System"

The Frequency for SR 3.7.4.2 was revised from 18 months to "31 days on a STAGGERED TEST BASIS." The Bases discussion for Frequency was also revised accordingly. A statement was added to the bases that clarified verification of the acceptance criteria was performed by comparing the test results to the pump curve.

LCO 3.7.11, "Fuel Building Air Cleanup System (FBACS)"

*The bases were corrected to discuss operation of the filtration heaters by humidistat control.

LCO 3.7.13, "Fuel Storage Pool Boron Concentration"

DOC "LA4" was corrected to state that this information is relocated to the Updated Final Safety Analysis Report (UFSAR). This change is consistent with the "Relocated Details Matrix" in Attachment II to this letter.

LCO 3.8.1, "AC Sources - Operating"

*The bases to LCO 3.8.1 were corrected to add additional descriptive information on an offsite circuit.

*The word "power" was added to the second sentence in the bases to Required Action A.2

*A discussion of the basis for the 18 month Frequency for SR 3.8.1.9 was added.

LCO 3.8.4, "DC Sources - Operating"

*The list of references in the bases to LCO 3.8.4 were corrected to correspond with the use of references in the text.

LCO 3.8.5, "DC Sources - Shutdown"

The discussion of operability in the bases to LCO 3.8.5 was modified to require only a battery charger or a battery to be operable for the LCO to be met. This change will allow testing of the batteries in MODES 5 and 6 without entering Required Actions in LCO 3.8.5.

LCO 3.8.7, "AC Instrument Bus Sources - Operating"

*Required Action A.1 was corrected to be consistent with the Condition statement.

LCO 3.8.8, "AC Instrument Bus Sources - Shutdown"

*SR 3.8.8.1 was corrected to add a note that modifies the acceptance criteria for constant voltage transformers to not require voltage and frequency measurement.

LCO 3.9.1, "Boron Concentration"

The bases to 3.9.6 was changed to show the K_{eff} value corresponding to the current licensing basis of 6% delta-k/k is 0.9433. The resolution of K_{eff} to four significant digits is necessary to avoid a more restrictive change to the current licensing basis (i.e., K_{eff} of 0.9400 is equivalent to 6.38% delta-k/k not 6.00% delta-k/k, therefore, additional boration is required by a K_{eff} of 0.9400 versus a keff of 0.9433).

LCO 3.9.3, "Containment Penetrations"

Discussion of Change (DOC) M14 was deleted as "Not Used." DOC M14 had been eliminated from the markup of the CTS in a previous supplement.

4.0, "Design Features"

*An editorial correction was made to delete "and" after Section 4.3.1.1.c.

5.1, "Responsibility"

*The word "and" was changed to "or" to be consistent with NUREG-1431.

5.5, "Programs and Manuals"

The CTS Markup of Final Operating License (FOL) DPR-23 incorrectly showed a relocation of a FOL license condition as "LA5," in ITS Sections 5.5.2, 5.5.3, and 5.5.10. DOC LA5 for Chapter 5.0 is not used. The markup was revised to delete reference to DOC LA5 and to indicate no change to the FOL.

United States Nuclear Regulatory Commission
Attachment IV to Serial: RNP-RA/97-0194
(329 Pages)

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
TECHNICAL SPECIFICATIONS CHANGE REQUEST TO CONVERT TO THE
IMPROVED STANDARD TECHNICAL SPECIFICATIONS

SUPPLEMENT 8

SUPPLEMENT 8
CONVERSION PACKAGE SECTION 3.1
PAGE INSERTION INSTRUCTIONS

Remove and insert the following pages into Enclosure 2 to Serial: RNP-RA/96-0141.

	<u>Remove Page</u>	<u>Insert Page</u>
a.	Part 1, "Markup of Current Technical Specifications (CTS)"	
	-	3.5-13 (3.1-4)
	-	3.5-13c (3.1-4)
	4.1-12 (3.1-4)	4.1-12 (3.1-4)
b.	Part 2, "Discussion of Changes (DOCs) for CTS Markup"	
	6, 7	6, 7
	-	10a
	12-14	12-14
c.	Part 3, "No Significant Hazards Consideration (NSHC), And Basis for Categorical Exclusion from 10 CFR 51.22"	
	13	13
	-	13a
d.	Part 4, "Markup of NUREG-4131, Revision 1, Standard Technical Specifications-Westinghouse Plants, (ISTS)"	
	3.1-17	3.1-17
	3.1-23	3.1-23
e.	Part 5, "Justification of Differences (JFDs) to ISTS"	
	2	2
f.	Part 6, "Markup of ISTS Bases"	
	B 3.1-50	B 3.1-50
g.	Part 7, "Justification for Differences (JFDs) to ISTS Bases"	
	NA	NA
h.	Part 8, "Proposed HBRSEP, Unit No. 2 ITS"	
	3.1-8	3.1-8
	3.1-9	3.1-9
	3.1-15	3.1-15
i.	Part 9, "Proposed Bases to HBRSEP, Unit No. 2 ITS Bases"	
	B 3.1-46	B 3.1-46