

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

PROPOSED CONDITIONS FOR FINAL OPERATING LICENSE DPR-23

1. Carolina Power & Light Company proposes the following license condition to be added to the license as subparagraph (a) to paragraph B, "Technical Specifications."

"For Surveillance Requirements (SRs) that are new in Amendment 176 to Final Operating License DPR-23, the first performance is due at the end of the first surveillance interval that begins at implementation of Amendment 176. For SRs that existed prior to Amendment 176, including SRs with modified acceptance criteria and SRs whose frequency of performance is being extended, the first performance is due at the end of the first surveillance interval that begins on the date the Surveillance was last performed prior to implementation of Amendment 176."

Justification for the Change

The license condition as stated above will ensure new SRs are completed within the interval that they are due, and allow the scheduling of new SRs in an organized manner. SRs are scheduled on a twelve (12) week rotating schedule, and new SRs will commence within that schedule at an appropriate performance date in accordance with the required Frequency. The Surveillance interval of existing SRs, including SRs with modified acceptance criteria and SRs whose frequency of performance is being extended, is referenced to the last performance of the SR prior to the Improved Technical Specifications (ITS) implementation date. This ensures that no Surveillance intervals are extended by the license condition beyond the Frequency allowed in Technical Specifications, prior to and after implementation of Amendment 176.

2. Carolina Power & Light Company proposes the following license condition to be added to the license. This license condition is proposed to be Appendix C to the Final Operating License. Appendix B is deleted and the requirements are relocated to the Offsite Dose Calculation Manual.

APPENDIX B

[Deleted]

APPENDIX C

ADDITIONAL CONDITIONS

FACILITY OPERATING LICENSE NO. DPR-23

"Carolina Power & Light Company shall comply with the following conditions on the scheduled noted below:

<u>Amendment Number</u>	<u>Additional Conditions</u>	<u>Implementation Date</u>
176	The licensee is authorized to relocate certain Technical Specification requirements included in Appendix A and Appendix B to licensee-controlled documents. Implementation of this amendment shall include the relocation of these technical specification requirements to the appropriate documents, as described in the licensee's application dated August 27, 1996, as supplemented 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, August 8, 1997, September 10, 1997, October 2, 1997, and October [13], 1997, evaluated in the staff's Safety Evaluation enclosed with this amendment. Changes may be made to requirements relocated to licensee-controlled documents in accordance with the change controls identified in the above letters.	This amendment is effective immediately and shall be implemented within 90 days of the date of this amendment."

Justification for the Change

The license condition authorizes relocation of technical specification requirements that were not retained in the ITS to licensee controlled documents. The relocated requirements were justified in the submittal as not required to be included in the ITS to provide adequate protection of the public health and safety, since the ITS retains the requirements in accordance with the criteria of 10 CFR 50.36. Commitments were made by CP&L in the submittal for appropriate change controls for each relocated requirement. This approach provides an effective level of regulatory control and provides for a more appropriate change control process.

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SUPPLEMENT 10

Remove and insert the following page into Enclosure 11 to Serial: RNP-RA/96-0141,
"Conversion Package Section 3.3," Part 2, "Discussion of Changes (DOCs)."

Remove Page

1
5

Insert Page

1
5

Remove and insert the following page into Enclosure 16 to Serial: RNP-RA/96-0141,
"Conversion Package Section 3.8."

Remove Page

Insert Page

- | | | |
|----|--|--------------------|
| a. | Part 2, "Discussion of Changes (DOCs) for CTS Markup" | |
| | 9 | 9 |
| b. | Part 4, "Markup of NUREG-4131, Revision 1, Standard Technical Specifications-
Westinghouse Plant, (ISTS)" | |
| | 3.8-15 | 3.8-15 |
| c. | Part 5, "Justification of Differences (JFDs) to ISTS" | |
| | 9 | 9 |
| d. | Part 6, "Markup of ISTS Bases" | |
| | B 3.8-30 | B 3.8-30 |
| e. | Part 8, "Proposed HBRSEP, Unit No. 2 ITS" | |
| | 3.8-10 | 3.8-10 |
| f. | Part 9, "Proposed Bases to FHBRSEP, Unit No. 2 ITS Bases" | |
| | B 3.8-21, B 3.8-22 | B 3.8-21, B 3.8-22 |

ADMINISTRATIVE CHANGES

- A1 In the conversion of the H. B. Robinson Steam Electric Plant (HBRSEP), Unit 2 Current Technical Specifications (CTS) to the proposed plant specific Improved Technical Specifications (ITS) certain wording preferences or conventions are adopted which do not result in technical changes (either actual or interpretational). Editorial changes, reformatting, and revised numbering are adopted to make ITS consistent with the conventions in the Standard Technical Specifications, Westinghouse Plants, NUREG-1431, Revision 1 (i.e., Improved Standard Technical Specifications (ISTS)).
- A2 CTS Specification 2.3.1.2.d describes in words, the amount by which the over temperature ΔT trip setpoint is automatically reduced. ITS Specification 3.3.1 provides, instead, the mathematical expression for this reduction. This change is administrative, and has no adverse impact on safety.
- A3 CTS Specification 2.3.1.2.f requires that the reactor be tripped on low reactor coolant flow. ITS Specification 3.3.1 has the same requirement, but identifies single loop low flow and two loop low flow separately. Since these numbers are identical, this change is administrative, and has no adverse impact on safety.
- A4 The CTS Bases (and References) are not retained in the ITS, but are replaced in their entirety. The ITS includes significantly expanded and improved Bases. The Bases do not define or impose any specific requirements but serve to explain, clarify and document the reasons (i.e., Bases) for the associated Specification. The Bases are not part of the Technical Specifications required by 10 CFR 50.36. This change is administrative, and has no adverse impact on safety.
- A5 The CTS is revised to adopt ISTS ACTIONS "Note," and/or Surveillance Requirements "Note." The ACTIONS "Note" provides for separate Condition entry for each function. The CTS is silent with regard to separate Condition entry, neither specifically permitting, nor disallowing. The Surveillance Requirements "Note" refers the reader to the specified ITS Table to determine which Surveillance Requirements apply for each Function. This change is administrative, and has no adverse impact on safety.
- A6 Not Used.

DISCUSSION OF CHANGES
ITS SECTION 3.3 - INSTRUMENTATION

which is higher than the Nuclear Flux Power Range Low Setpoint, hence Action 2, Part b, could not be entered for an inoperability of the Nuclear Flux Power Range Low Setpoint. Required Action E is more appropriate for the Nuclear Flux Power Range Low Setpoint. Therefore, this change is administrative, and has no impact on safety.

- A29 The CTS is revised to adopt Note 1 to the ACTIONS of ITS 3.3.3, Post Accident Monitoring (PAM) Instrumentation. Note 1 states LCO 3.0.4 is not applicable. As such, the MODE change restrictions of ITS LCO 3.0.4 are not applicable for inoperable PAM Instrumentation. The HBRSEP CTS do not include MODE change restrictions similar to ITS LCO 3.0.4. Therefore, no MODE change restrictions currently apply for inoperable instrumentation of CTS Table 3.5-5, Instrumentation to Follow the Course of an Accident, and this change is considered to be administrative.
- A30 CTS Table 3.5-2 identifies that the Applicability of the Intermediate Range Neutron Flux channels is when the reactor is critical below the P-10 interlock. The CTS Table 3.5-2 ACTION 3 splits the actions based on whether power is below or above the P-6 interlock setpoint (ITS Table 3.3-1 Function 3 and Notes (c) and (d)). The only difference in the requirements when above or below the P-6 interlock is in the applicable ACTIONS of ITS 3.3.1. Therefore, the change (including the addition of Note (c)) is considered to involve a presentation preference for consistency with NUREG-1431 and is administrative.
- A31 CTS Table 3.5-2 identifies that the Applicability of the Source Range Neutron Flux channels in Function 4.B is Hot/Cold Shutdown (ITS MODES 3, 4, and 5). CTS Table 3.5-2 identifies that the Applicability of the Source Range Neutron Flux channels in Function 4.C is Hot/Cold Shutdown (ITS MODES 3, 4, and 5) with the reactor trip breakers closed. ITS Table 3.3-1 Function 4 and Notes (a) and (e) identify the Applicability of the Source Range Neutron Flux channels as MODES 3, 4, and 5 with Rod Control System capable of rod withdrawal, or one or more rods not fully inserted, and MODES 3, 4, and 5 with the reactor trip breakers open. Note (e) also clarifies that in MODES 3, 4, and 5 with the reactor trip breakers open, the source range Function does not provide a reactor trip but does provide indication and alarm. (The change associated with Note (a) is addressed in Discussion of Change L35.) The Notes associated with the Applicability of Source Range Neutron Flux channels ensure that the MODE 3, 4, and 5 requirements for Source Range Neutron Flux channels are applied consistent with the intent of the CTS Table 3.5-2 Applicability for the Source Range Neutron Flux channels in Functions 4B and 4C. Therefore, this change is administrative.
- A32 CTS 3.10.5.1.a requires two reactor trip breakers to be operable. CTS 3.10.5.2.c allows one reactor trip bypass breaker to be racked in and closed for a limited period of time and CTS Table 4.1-1 Item 47 requires performance of testing to demonstrate the operability of the reactor

DISCUSSION OF CHANGES
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

is 140 gallons, which is approximately equal to 1/2 full, and is selected to ensure adequate fuel oil for a minimum of 35 minutes of DG operation at full load plus 10%. The 31 day Frequency is adequate to assure that a sufficient supply of fuel oil is available, since low level alarms are provided and facility operators would be aware of any large uses of fuel oil during this period. SR 3.8.1.5 requires Removal of water from the fuel oil day tanks once every 31 days. Microbiological fouling is a major cause of fuel oil degradation. There are numerous bacteria that can grow in fuel oil and cause fouling, but all must have a water environment in order to survive. Removal of water from the fuel oil day tanks once every 31 days eliminates the necessary environment for bacterial survival. This is the most effective means of controlling microbiological fouling. In addition, it eliminates the potential for water entrainment in the fuel oil during DG operation. The Surveillance Frequencies are established by Regulatory Guide 1.137. SR 3.8.1.6 demonstrates that each required fuel oil transfer pump operates and transfers fuel oil from the storage tank to its associated day tank. This is required to support continuous operation of standby power sources. This Surveillance provides assurance that the fuel oil transfer pump is OPERABLE, the fuel oil piping system is intact, the fuel delivery piping is not obstructed, and the controls and control systems for automatic fuel transfer systems are OPERABLE. The frequency of 31 days is based on the design of fuel transfer system. The pumps operate automatically in order to maintain an adequate volume of fuel oil in the day tanks during or following DG testing. SR 3.8.1.7 helps to ensure the availability of the standby electrical power supply to mitigate DBAs and transients and to maintain the unit in a safe shutdown condition. SR 3.8.1.8 demonstrates the capability of the DGs to operate properly after a loss of the single largest load. SR 3.8.1.9 demonstrates the as designed operation of the standby power sources during loss of the offsite source. This test verifies all actions encountered from the loss of offsite power, including shedding of the nonessential loads and energization of the emergency buses and respective loads from the DG. It further demonstrates the capability of the DG to automatically achieve the required voltage and frequency within the specified time. SR 3.8.1.10 demonstrates that the DG automatically starts and achieves the required voltage and frequency within the specified time (10 seconds) from the design basis actuation signal (LOCA signal) and operates for ≥ 5 minutes. The 5 minute period provides sufficient time to demonstrate stability. SR 3.8.1.13 demonstrates that the diesel engine can restart from a hot condition, such as subsequent to shutdown from normal Surveillances, and achieve the required voltage and frequency within 10 seconds. The 18 month Frequency is based on engineering judgement and is intended to be consistent with expected fuel cycle lengths. SR 3.8.1.14 requires verifying the setpoint of each sequenced load block. Under accident and loss of offsite power conditions, loads are sequentially

CTS

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.8.1.14</p> <p>-----NOTE----- This Surveillance shall not be performed in MODE 1, 2, 3, or 4. However, credit may be taken for unplanned events that satisfy this SR.</p> <p>(TSTF-8, Rev. 2)</p> <p>Verify interval between each sequenced load block is within $\pm 10\%$ of design interval for each emergency and shutdown load sequencer.</p>	<p>46</p> <p>Actuation of Setpoint 46</p> <p>18 months</p> <p>0.5 seconds</p>
<p>SR 3.8.1.13</p> <p>-----NOTES-----</p> <ol style="list-style-type: none"> All DG starts may be preceded by an engine prelube period. This Surveillance shall not be performed in MODE 1, 2, 3, or 4. However, credit may be taken for unplanned events that satisfy this SR. <p>(TSTF-8, Rev. 2)</p> <p>Verify on an actual or simulated loss of offsite power signal in conjunction with an actual or simulated ESF actuation signal:</p> <ol style="list-style-type: none"> De-energization of emergency buses; Load shedding from emergency buses; and DG auto-starts from standby condition and: <ol style="list-style-type: none"> energizes permanently connected loads in ≤ 10 seconds. 	<p>11</p> <p>Insert 3.8.1-8</p> <p>18 months</p> <p>(continued)</p>

[M 6]

[A 8]

[A 8]

[3.7.2.e]

[4.6.1.2]

JUSTIFICATION FOR DIFFERENCES
ITS SPECIFICATION 3.8 - ELECTRICAL POWER SYSTEMS

Source Range Neutron Flux monitors for Nuclear Instrumentation (ITS 3.9.2);

Pressurizer PORVs for Low Temperature Overpressure Protection (ITS 3.4.12);

Containment radiation monitors for Containment Ventilation Isolation Instrumentation (ITS 3.3.6);

Control room radiation monitor for Control Room Emergency Filtration System (CREFS) Instrumentation (ITS 3.3.7); and

Automatic Actuation Logic and Actuation Relays for CREFS Instrumentation (ITS 3.3.7)

The proposed change to the requirements for AC instrument bus sources will continue to assure that sufficient power is available to support the response to events postulated during shutdown conditions in the event of a loss of offsite power or a single failure. It should also be noted that this change is consistent with the initial philosophy of the ITS NUREGs.

- 45 ISTS SR 3.8.1.9 is adopted in ITS as SR 3.8.1.8, with the acceptance criteria changed to state that the DG does not trip on overspeed. A test similar to this SR has only been performed once in the past and acceptance criteria were not established for that test other than the DG would not trip on overspeed. The test showed that the DG could reject a large load (i.e., a Containment Spray pump and a Containment Cooling Unit) without experiencing an overspeed trip. Since the DG does not trip, the DG remains OPERABLE and the emergency bus continues to perform its required function.
- 46 ISTS SR 3.8.1.18 is revised in ITS as SR 3.8.1.14, with the acceptance criteria changed to state that the actuation of each sequenced load block is within ± 0.5 seconds of design septoint for each emergency load sequencer. The load sequencer design uses separate timing relays for each sequencer load block. The timing relay setpoints are set such that each relay actuates at appropriate design intervals so that the diesel generator has time to restore frequency and voltage prior to applying the next load. A design tolerance of ± 0.5 seconds is incorporated into the sequencing calculations for loading the diesel. The assumptions of the accident analyses are assured when each sequencer relay actuates at its setpoint ± 0.5 seconds. Therefore, this change to the acceptance criteria assures that the acceptance criteria verifies operability of the sequencer in accordance with plant design.

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.8.1.17 (continued)

This testing may include any series of sequential, overlapping, or total steps so that the entire connection and loading sequence is verified.

The [18 month] Frequency is consistent with the recommendations of Regulatory Guide 1.108 (Ref. 9), paragraph 2.a.(8), takes into consideration unit conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths.

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would remove a required offsite circuit from service, perturb the electrical distribution system, and challenge safety systems. Credit may be taken for unplanned events that satisfy this SR.

SR 3.8.1.18

Under accident ~~and~~ loss of offsite power ~~conditions~~ loads are sequentially connected to the bus by the ~~automatic~~ load sequencer~~s~~. The sequencing logic controls the permissive and starting signals to motor breakers to prevent overloading of the DGs due to high motor starting currents. The ~~load~~ sequence time ~~interval~~ tolerance ensures that sufficient time exists for the DG to restore frequency and voltage prior to applying the next load and that safety analysis assumptions regarding ESF equipment time delays are not violated. Reference 2 provides a summary of the automatic loading of ESF buses.

The Frequency of ~~18 months~~ is consistent with the recommendations of Regulatory Guide 1.108 (Ref. 9), paragraph 2.a.(2), takes into consideration unit conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths.

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would remove a required offsite circuit from service, perturb the electrical distribution system, and challenge safety systems. Credit may be taken for unplanned events that satisfy this SR.

TSTF-8, Rev. 2

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.8.1.13 -----NOTES-----</p> <ol style="list-style-type: none"> 1. This Surveillance shall be performed within 5 minutes of shutting down the DG after the DG has operated ≥ 2 hours loaded ≥ 2400 kW and ≤ 2500 kW. <p> Momentary transients outside of load range do not invalidate this test.</p> <ol style="list-style-type: none"> 2. All DG starts may be preceded by an engine prelube period. <p>-----</p> <p>Verify each DG starts and achieves, in ≤ 10 seconds, voltage ≥ 467 V, and frequency ≥ 58.8 Hz, and after steady state conditions are reached, maintains voltage ≥ 467 V and ≤ 493 V and frequency ≥ 58.8 Hz and ≤ 61.2 Hz.</p>	<p>18 months</p>
<p>SR 3.8.1.14 -----NOTE-----</p> <p>This Surveillance shall not be performed in MODE 1, 2, 3, or 4.</p> <p>-----</p> <p>Verify actuation of each sequenced load block is within ± 0.5 seconds of design setpoint for each emergency load sequencer.</p>	<p>18 months</p>

(continued)

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.8.1.13

This Surveillance demonstrates that the diesel engine can restart from a hot condition, such as subsequent to shutdown from normal Surveillances, and achieve the required voltage and frequency within 10 seconds. The 10 second time is derived from the requirements of the accident analysis to respond to a design basis large break LOCA. Stable operation at the nominal voltage and frequency values is also essential to establishing DG OPERABILITY, but a time constraint is not imposed. This is because a typical DG will experience a period of voltage and frequency oscillations prior to reaching steady state operation if these oscillations are not damped out by load application. This period may extend beyond the 10 second acceptance criteria and could be a cause for failing the SR. In lieu of a time constraint in the SR, HBRSEP Unit No. 2 will monitor and trend the actual time to reach steady state operation as a means of assuring there is no voltage regulator or governor degradation which could cause a DG to become inoperable. The 18 month Frequency is based on engineering judgement and is intended to be consistent with expected fuel cycle lengths.

This SR is modified by two Notes. Note 1 ensures that the test is performed with the diesel sufficiently hot. The load band is provided to avoid routine overloading of the DG. Routine overloads may result in more frequent teardown inspections in accordance with vendor recommendations in order to maintain DG OPERABILITY. The requirement that the diesel has operated for at least 2 hours at full load conditions prior to performance of this Surveillance is based on manufacturer recommendations for achieving hot conditions. Momentary transients due to changing bus loads do not invalidate this test. Note 2 allows all DG starts to be preceded by an engine prelube period to minimize wear and tear on the diesel during testing.

SR 3.8.1.14

Under accident and loss of offsite power conditions, loads are sequentially connected to the bus by the automatic load sequencer. The sequencing logic controls the permissive and starting signals to motor breakers to prevent overloading of the DGs due to high motor starting currents. The ± 0.5

(continued)

BASES

SURVEILLANCE
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SR 3.8.1.14 (continued)

seconds load sequence time setpoint tolerance ensures that sufficient time exists for the DG to restore frequency and voltage prior to applying the next load and that safety analysis assumptions regarding ESF equipment time delays are not violated. Reference 2 provides a summary of the automatic loading of ESF buses.

The Frequency of 18 months takes into consideration unit conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths.

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would remove a required offsite circuit from service, perturb the electrical distribution system, and challenge safety systems.

SR 3.8.1.15

In the event of a DBA coincident with a loss of offsite power, the DGs are required to supply the necessary power to ESF systems so that the fuel, RCS, and containment design limits are not exceeded.

This Surveillance demonstrates the DG operation, as discussed in the Bases for SR 3.8.1.9, during a loss of offsite power actuation test signal in conjunction with an ESF actuation signal. In lieu of actual demonstration of connection and loading of loads, testing that adequately shows the capability of the DG system to perform these functions is acceptable. This testing may include any series of sequential, overlapping, or total steps so that the entire connection and loading sequence is verified.

The Frequency of 18 months takes into consideration unit conditions required to perform the Surveillance and is intended to be consistent with an expected fuel cycle length of 18 months.

This SR is modified by three Notes. The reason for Note 1 is to minimize wear and tear on the DGs during testing. For the purpose of this testing, the DGs must be started from standby conditions, that is, with the engine coolant and oil continuously circulated and temperature maintained

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MATRIX OF ADMINISTRATIVE CHANGES

MATRIX OF ADMINISTRATIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS CHAPTER 1.0 - USE AND APPLICATION			
1.0 A1	Editorial, text, and format changes were made of an administrative nature to conform with conventions used in NUREG-1431, "Standard Technical Specifications - Westinghouse Plants," (i.e., ISTS).	1.0	Chapter 1, 3.1.4
1.0 A2	The CTS term "Rated Power" was changed to "thermal power" in ITS.	1.0	1.2
1.0 A3	The CTS definition of "Hot Shutdown Condition" was changed to ITS MODE 3 and MODE 4, which apply to conditions encompassed by the "Hot Shutdown Condition."	1.0	1.2.3
1.0 A4	The CTS criticality requirements of MODES 1 through 5 were clarified in ITS to be tied to a specific value for reactivity (i.e., k_{eff}).	1.0	1.2
1.0 A5	The CTS definitions for reactor power and criticality were changed slightly to correspond with ITS MODES 1 and 2. The effect of these changes were evaluated in the specific application of the definitions in the remaining specifications.	1.0	1.2
1.0 A6	Additional definitions were added in ITS. The effect of the additional definitions were evaluated in the specific application of the definitions in the remaining specifications.	1.0	1.0
1.0 A7	The CTS definition for refueling operations was changed to be consistent with ISTS definitions of MODE 6 and CORE ALTERATIONS. The effect of the additional definitions were evaluated in the specific application of the definitions in the remaining specifications.	1.0	1.2

MATRIX OF ADMINISTRATIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
1.0 A8	CTS definitions not used in ITS were deleted.	N/A	1.0
1.0 A9	The CTS definition of OPERABLE - OPERABILITY is restated in ITS with essentially no change in requirement.	1.0	1.3
1.0 A10	The CTS definition of CHANNEL CALIBRATION was changed in ITS to recognize that RTDs and thermocouples are not adjustable. The effect of the additional definitions were evaluated in the specific application of the definitions in the remaining specifications.	1.0	1.6.1
1.0 A11	The CTS definition of STAGGERED TEST BASIS was changed in ITS. The effect of the additional definitions were evaluated in the specific application of the definitions in the remaining specifications.	1.0	1.10
1.0 A12	The CTS was revised to add ITS discussions fo Logical Connectors, Completion Times, and Frequency.	1.0	N/A
1.0 A13	The CTS definition of Channel Functional Test was changed to the ITS CHANNEL OPERATIONAL TEST (COT). The change to the definition provides additional detail with respect to test methods and scope of testing.	1.0	1.6.4
ITS CHAPTER 2.0 - SAFETY LIMITS (SLs)			
2.0 A1	Editorial, text, and format changes were made of an administrative nature to conform with conventions used in NUREG-1431.	2.0	2.0, 6.7.1
2.0 A2	The reference temperature for safety limits was clarified to be the highest cold leg temperature.	2.1	2.1

MATRIX OF ADMINISTRATIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
2.0 A3	Descriptive information regarding interpretation of the safety limits graph were deleted.	2.1	2.1
2.0 A4	The safety limits figure was annotated to clearly define acceptable and unacceptable operation.	2.1	2.1
2.0 A5	Notification requirements duplicating existing requirements in 10 CFR 50.72 and 10 CFR 50.36 were deleted.	N/A	6.7.1
2.0 A6	Notification requirements duplicating existing requirements in 10 CFR 50.72 were deleted.	N/A	6.7.1
2.0 A7	Bases for the Current Technical Specifications (CTS) were deleted.	N/A	N/A
ITS CHAPTER 3.0 - LCO AND SR APPLICABILITY			
3.0 A1	Editorial, text, and format changes were made of an administrative nature to conform with conventions used in NUREG-1431.	3.0	3.0, 3.3.7, 4.0, 4.1
3.0 A2	ISTS Specification 3.0.1 was adopted in ITS consistent with current interpretation and practice.	3.0.1	3.0
3.0 A3	ISTS Specification 3.0.2 was adopted in ITS consistent with current interpretation and practice.	3.0.2	3.0
3.0 A4	Certain wording and text in ISTS 3.0.3 was adopted in ITS 3.0.3 consistent with current interpretation and practice.	3.0.3	3.0
3.0 A5	Not Used.	N/A	N/A
3.0 A6	ISTS Specification 3.0.6 was adopted in ITS consistent with current interpretation and practice.	3.0.6	3.0

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.0 A7	ISTS Specification 3.0.7 was adopted in ITS consistent with current interpretation and practice.	3.0.7	3.0
3.0 A8	ISTS Specification Surveillance Requirement (SR) 3.0.1 was adopted in ITS consistent with current interpretation and practice.	SR 3.0.1	4.0
3.0 A9	ISTS Specification SR 3.0.2 was adopted in ITS consistent with current interpretation and practice.	SR 3.0.2	4.0
3.0 A10	Requirements to perform testing in CTS Section 4.1.1 were duplicated elsewhere and were deleted.	N/A	4.1.1
3.0 A11	Bases for the CTS were deleted.	N/A	N/A
3.0 A12	Requirements to notify the NRC when corrective maintenance will exceed allowed outage times were eliminated. The requirements were rendered moot by Amendment 67 which incorporated requirements to shutdown the reactor when allowed outage times are exceeded.	N/A	3.3.7
ITS CHAPTER 3.1 - REACTIVITY CONTROL SYSTEMS			
3.1 A1	Editorial, text, and format changes were made of an administrative nature to conform with conventions used in NUREG-1431.	3.1	3.1, 3.5, 3.10, 4.1, 4.9
3.1 A2	CTS requirements for Shutdown Margin during hot shutdown were changed in ITS to be consistent with the definition of MODEs.	3.1.1	3,10.8
3.1 A3	Not Used	N/A	N/A

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.1 A4	Minor text changes were made to the CTS in ITS to clarify the Limiting Condition for Operations (LCO) conditions for ITS 3.1.4, "Rod Group Alignment Limits."	3.1.4	3.10.5
3.1 A5	Not Used	N/A	N/A
3.1 A6	Changes were made to the CTS presentation in ITS of conditions associated with an inoperable rod and a misaligned rod.	3.1.4	3.10.6
3.1 A7	Bases for the CTS were deleted.	N/A	N/A
3.1 A8	Not Used	N/A	N/A
ITS CHAPTER 3.2 - POWER DISTRIBUTION LIMITS			
3.2 A1	Editorial, text, and format changes were made of an administrative nature to conform with conventions used in NUREG-1431.	3.2	1.9, 3.10, 4.11
3.2 A2	The CTS term effective full power month was changed to 31 effective full power days in ITS.	3.2.1	3.10.2.1.1
3.2 A3	The LCO in CTS for heat flux hot channel factor and nuclear enthalpy rise hot channel factor was divided into two separate and distinct LCOs in ITS.	3.2.1 3.2.2	3.10.2.1.1
3.2 A4	A CTS required action to reduce power if the heat flux hot channel factor limit exceeds limits was deleted because the required action always resulted in a power reduction less limiting than another required action in CTS that was retained in ITS.	3.2.1	3.10.2.1.1
3.2 A5	Redundant CTS information was eliminated.	N/A	3.10.2.2

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.2 A6	A CTS mathematical expression for a required action to reduce power in the event that the heat flux hot channel factor was restated in ITS in a mathematically equivalent manner.	3.2.1	3.10.2.2.1
3.2 A7	Detail information in a CTS required action that was already included in the bases was deleted from the ITS action statement.	3.2.1	3.10.2.2.1
3.2 A8	Bases for the CTS were deleted.	N/A	N/A
3.2 A9	The CTS term immediately was changed to an ITS Completion Time of 15 minutes consistent with current interpretation and practice.	3.2.3	3.10.2.6
3.2 A10	The CTS term immediately was changed to an ITS Completion Time 30 minutes consistent with current interpretation and practice and to provide consistency with ITS Section 1.3, "Completion Times," which requires times be referenced to the moment that the LCO is not met.	3.2.3	3.10.2.7
3.2 A11	CTS requirements that restrict increase in power were deleted because they duplicated another CTS specification that was retained in ITS.	N/A	3.10.2.7
3.2 A12	CTS requirements for accumulation of penalty deviation time were rewritten to provide clarity in ITS.	3.2.3	3.10.2.8
3.2 A13	A clarification was added in the ITS to the CTS note for accumulated penalty deviation time that the time is accumulated in increments of one minute.	3.2.3	3.10.2.7
3.2 A14	An ITS note was added that provides clarification to complete a required action if the cumulative penalty deviation time exceeds one (1) hour.	3.2.3	3.10.2.7

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.2 A15	Additional clarification was added in notes to SR 3.2.3.2 and SR 3.2.3.2 Frequency.	3.2.3	3.10.2.10
3.2 A16	A CTS requirement to determine Axial Flux Difference (AFD) during the measurement of the heat flux hot channel factor was deleted because it duplicated another CTS specification that was retained in ITS.	N/A	3.10.2.11
3.2 A17	The CTS definition for Allowable Power Level was retained in ITS with minor presentation differences.	3.2.3	3.10.2.2.2
3.2 A18	A CTS requirement to use power distribution maps to confirm the axial flux difference was restated more clearly in ITS.	3.2.3	3.10.2.1.1
3.2 A19	The CTS term "rated values" was clarified to state in ITS as "rated thermal power values."	3.2.4	3.10.3.1
3.2 A20	The CTS allowance for use of three excore detectors to determine quadrant power tilt was clarified in ITS.	3.2.4	1.8
3.2 A21	A CTS footnote that defines Allowable Power Level in CTS was deleted as duplicating another definition that was retained in ITS.	3.2.3	3.10.2.3, 3.10.2.6
3.2 A22	The CTS definition of Allowable Power Level was revised to add descriptive information in ITS.	3.2.3	3.10.2.2.2
3.2 A23	CTS terms representing the heat flux hot channel factor were clarified in ITS.	3.2.1	3.10.2.1
3.2 A24	Additional clarification was added to the CTS requirement in the ITS to log axial flux difference when the alarms are out of service.	3.2.3	3.10.2.10

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Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS CHAPTER 3.3 - INSTRUMENTATION			
3.3 A1	Editorial, text, and format changes were made of an administrative nature to conform with conventions used in NUREG-1431.	3.3	2.3, 3.5, 3.10, 4.1, 3.8, 3.4.
3.3 A2	The CTS requirement for over-temperature delta-temperature setpoint was restated in ITS as an equation.	3.3.1	2.3
3.3 A3	A CTS function for reactor coolant loop flow setpoint was restated in ITS as two separate trip functions.	3.3.1	2.3
3.3 A4	Bases for the CTS were deleted.	N/A	N/A
3.3 A5	A note for separate condition entry was added to ITS ACTIONS consistent with current interpretation and practice. A clarifying note was added to Surveillance Requirements.	3.3.1	3.5
3.3 A6	Not Used	N/A	N/A
3.3 A7	Descriptive information in the "Remarks" column of CTS testing requirements was deleted.	N/A	4.1
3.3 A8	Not Used	N/A	N/A
3.3 A9	Not Used	N/A	N/A
3.3 A10	A note was added in ITS exempting verification of setpoints for manual initiating functions, which is consistent with the CTS requirements for testing manual initiation functions.	3.3.2	4.1

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.3 A11	The applicability of certain Engineered Safety Features Actuation System (ESFAS) functions was changed from a CTS definition associated with Reactor Coolant System (RCS) temperature to the ITS equivalent in MODES.	3.3.2	3.5
3.3 A12	An ITS Required Action directing the user to review the instrumentation table was added.	3.3.3	3.5
3.3 A13	Not Used	N/A	N/A
3.3 A14	A note containing a one time CTS requirement that has expired was deleted.	N/A	3.5
3.3 A15	A Surveillance Requirement (SR) note was added in ITS to reference the functions to which the SRs apply.	3.3.3	4.1
3.3 A16	A note exempting calibration of neutron detectors from the CHANNEL CALIBRATION was added to ITS which is consistent with CTS requirements.	3.3.3	4.1
3.3 A17	Footnotes providing descriptive information for the functions in the CTS ESFAS requirements table were deleted.	N/A	4.1
3.3 A18	The CTS requirements for the reactor trip breakers were clarified in ITS to include the undervoltage and shunt trip mechanisms.	3.3.1	3.10.5.1
3.3 A19	CTS footnotes referencing the applicable Three Mile Island (TMI) action item that the Post Accident Monitoring function addresses were deleted.	N/A	3.5, 4.1

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.3 A20	A statement that requires the Auxiliary Feedwater (AFW) System instrumentation functions to be OPERABLE was added in ITS. The requirement already existed in CTS but was not explicitly stated.	3.3.8	3.4
3.3 A21	Descriptive information relating to undervoltage relays and logic was deleted from CTS.	3.3.8	3.4
3.3 A22	Requirements for a CHANNEL CHECK and CHANNEL CALIBRATION were moved from a CTS table of instrumentation SRs to ITS Table 3.3.8-1 which contains both the LCOs and the SRs.	3.3.8	4.1, 4.8
3.3 A23	Not Used	N/A	N/A
3.3 A24	Descriptive information in CTS notes were deleted.	N/A	3.5
3.3 A25	SR statements were added in ITS. The application of the SRs to specific functions were discussed in other changes.	3.3.1	4.1
3.3 A26	Not Used	N/A	N/A
3.3 A27	Requirements for the number of OPERABLE channels in the CTS were restated from "minimum channels operable" and "minimum degree of redundancy" to the ITS columns of "Total Number of Channels."	3.3.1, 3.3.2, 3.3.5, 3.3.6, 3.3.8	3.5, 3.8
3.3 A28	A CTS Required Action for the Nuclear Flux Power Range Low Setpoint which could not be entered for an inoperability was deleted.	3.3.1	3.5
3.3 A29	A note was added to the ACTIONS of ITS 3.3.3 that LCO 3.0.4 is not applicable. MODE change restrictions do not apply to Post Accident Monitoring (PAM) instrumentation.	3.3.3	3.5

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.3 A30	The applicability of the Intermediate Range Neutron Flux Channels was changed in presentation from the CTS to the ITS.	3.3.1	3.5
3.3 A31	The CTS applicability of source range monitors in the CTS was changed from "hot/Cold shutdown" to MODES in ITS with additional notes added for clarification.	3.3.1	3.5
3.3 A32	The CTS requirements for reactor trip bypass breakers that are racked in were modified in presentation for consistency in ITS.	3.3.1	3.10.5
3.3 A33	The CTS daily calibration of nuclear power range instrumentation was modified in presentation from CTS to ITS.	3.3.1	4.1
3.3 A34	A note was added to SR 3.3.1.3 for reactor coolant temperature instrumentation consistent with current interpretation of CTS.	3.3.1	3.5
3.3 A35	A CTS test requirement for the reactor trip bypass breakers was clarified in the ITS to be a Trip Actuating Device Operational Test (TADOT).	3.3.1	4.1
3.3 A36	A note was added to SR 3.3.1.8 to verify interlocks are in the required state during testing. The note is consistent with the CTS requirement for OPERABILITY of the instrumentation.	3.3.1	4.1
3.3 A37	A note was added in ITS exempting verification of setpoints for certain functions when performing a TADOT, which is consistent with the CTS requirements for testing manual initiation functions.	3.3.1	4.1

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.3 A38	A note was added to SR 3.3.1.10 and 3.3.1.12 that time constants be verified to be set to required values during CHANNEL CALIBRATIONS. The note is consistent with the CTS requirement for OPERABILITY of the instrumentation.	3.3.1	4.1
3.3 A39	A CTS requirement to verify valve position indication for the Power Operated Relief Valves (PORVs). PORV Block valves and Safety valves was included in the ITS as a requirement to perform a TADOT.	3.3.3	4.1
3.3 A40	A CTS Required Action that does not correspond to any Condition was deleted.	N/A	3.5
3.3 A41	A note was added to ITS Table 3.3.1-1 that is consistent with the CTS allowance that logic channel inputs from the source range instrumentation do not have to be OPERABLE above the P-6 interlock.	3.3.1	3.5, 4.1
SECTION 3.4 - REACTOR COOLANT SYSTEM			
3.4 A1	Editorial, text, and format changes were made of an administrative nature to conform with conventions used in NUREG-1431.	3.4	3.1, 2.1, 3.3, 4.6, 4.1, 4.2, 6.9
3.4 A2	Bases for the CTS were deleted.	N/A	N/A
3.4 A3	CTS requirements relating to power operation with less than three Reactor Coolant Pumps (RCPs) in operation, that were applicable to earlier core designs, and that describe operation that is prohibited elsewhere in CTS, were deleted and not retained in ITS.	N/A	2.1

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.4 A4	A note was added to LCO 3.4.5 which requires that the LCO is required to the met whenever the rod control system is capable of rod withdrawal, was added as an administrative change, because CTS notes which describe specific means of rendering rods incapable of rod withdrawal were also retained in ITS.	3.4.5	3.1.1.1
3.4 A5	Not used	N/A	N/A
3.4 A6	A CTS parenthetical statement "or jogged" was deleted in ITS. The CTS requirements retained in ITS regarding starting of the RCPs convey the same meaning.	N/A	3.1.1.1
3.4 A7	The CTS requirements applicable to the cold shutdown condition were divided in applicability between MODE 5- Loops Filled and MODE 5-Loops Not Filled.	3.4.7, 3.4.8	3.3.1.4
3.4 A8	Residual Heat Removal (RHR) OPERABILITY requirements were revised in ITS to delete reference to the required power sources since the ITS definition of OPERABILITY provides identical requirements.	3.4.7, 3.4.8	3.3.1.4
3.4 A9	Not Used	N/A	N/A
3.4 A10	The CTS requirement to restore an RHR loop to OPERABLE status "as soon as possible" was revised in the ITS as a Completion Time of "Immediately."	3.4.7, 3.4.8	3.3.1.4
3.4 A11	CTS requirements to report certain inoperable conditions to the NRC were not retained in ITS as duplicating 10 CFR 50.72 and 10 CFR 50.73 reporting requirements.	N/A	3.3.1.4
3.4 A12	The CTS term "loop" in reference to the RHR system was changed in ITS to "train."	3.4.7, 3.4.8,	3.3.1.4

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.4 A13	The CTS requirements for a "normal" water level in the pressurizer were revised in ITS to numerical requirements corresponding to "normal" for the appropriate operating MODE.	3.4.9	3.1.3.4
3.4 A14	CTS requirements that the pressurizer and necessary spray and heater controls be OPERABLE were not retained in ITS because the requirements are encompassed by the definition of OPERABILITY in ITS.	N/A	3.1.1.3
3.4 A15	The CTS SR Frequency for pressurizer safety valve testing was revised from "each refueling shutdown" to "in accordance with the Inservice Testing Program," which is an equivalent Frequency requirement for this SR.	3.4.10	4.1
3.4 A16	The CTS requirement to perform actions for excessive leakage through the pressurizer PORVs were retained in ITS as requiring action for an inoperable PORV that is capable of being manually cycled.	3.4.11	3.1.1.5
3.4 A17	The CTS was revised to add a note in ITS permitting separate condition entry for each inoperable PORV consistent with current interpretation of CTS.	3.4.11	3.1.1.5
3.4 A18	The CTS requirement to perform actions under certain PORV inoperable conditions were retained in ITS as requiring action for an inoperable PORV that is capable of being manually cycled.	3.4.11	3.1.1.5
3.4 A19	CTS requirements to report certain inoperable conditions to the NRC were not retained in ITS as duplicating 10 CFR 50.72 and 10 CFR 50.73 reporting requirements.	3.4.11	3.1.1.5

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.4 A20	A CTS allowance to permit startup to continue outside of the applicability of the Low Pressure Overpressure Protection (LTOP) LCO was not retained in ITS since this allowance is adequately stated in ITS Section 3.0	N/A	3.1.2.1
3.4 A21	A specific SR was added to CTS in ITS as SR 3.4.13.2 which references the steam generator (SG) tube integrity program that already exists as a requirement in the CTS.	3.4.13	3.1.5
3.4 A22	A CTS requirement to maintain Pressure Isolation Valves (PIVs) leakage within limits was restated in ITS to require that PIVs be OPERABLE.	3.4.14	3.1.5.4
3.4 A23	The CTS requirements for LTOP were modified in ITS to require that no Safety Injection (SI) pumps be capable of injecting into the RCS with RCS temperatures \leq 150°F. The requirement already exists implicitly in CTS.	3.4.12	3.1.2.1
3.4 A24	CTS sampling requirements for stack iodine and particulates which duplicate other CTS requirements that have been relocated were deleted.	N/A	4.1
3.4 A25	CTS requirements for PIVs were modified in ITS to specifically permit the alignment and operation of the RHR system through PIVs in the RHR flow path, without declaring the PIVs inoperable due to leakage.	3.4.14	3.1.5.4

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.4 A26	Notes were added to CTS testing requirements that limit the required performance of PIV SRs to conditions appropriate to the required function of the PIVs consistent with current interpretation of CTS. A third note that requires PIV testing when a PIV is cycled was added in ITS consistent with current interpretation of PIV OPERABILITY in CTS.	3.4.14	4.1
3.4 A27	A CTS requirement to allow for the RCS activity to stabilize after startup from a refueling outage before a sample of RCS activity is taken was restated in ITS to not require performance of the SR until 31 Effective Full Power Days (EFPDs) have elapsed.	3.4.16	4.1
3.4 A28	A CTS requirement to perform an SR on the PORVs at each refueling was restated in ITS to require performance prior to entering MODE 2 from MODE 3 if not performed in the previous 18 months.	3.4.11	4.2.4
3.4 A29	CTS requirements for pressure-temperature limits were clarified in ITS to add the phrase "RCS temperature" in the ITS LCO statement.	3.4.3	3.1.2
3.4 A30	CTS testing requirements for the PORVS were modified in ITS to delete specific separate functional testing of each component.	3.4.11	4.2.4
3.4 A31	A CTS note to track trending of PIV leakage was restated in ITS in accordance with ITS writing standards.	3.4.14	3.1
3.4 A32	The CTS acceptance criteria for PIV leakage was modified to clarify that the acceptance criteria is to be applied at operating RCS pressure or above.	3.4.14	3.1

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.4 A33	The applicability of CTS requirements of the Chemical and Volume Control System (CVCS) was modified in ITS to correspond to MODES.	3.4.17	3.2
3.4 A34	CVCS OPERABILITY requirements were revised in ITS to delete reference to emergency power sources since the ITS definition of OPERABILITY provides identical requirements.	3.4.17	3.2
3.4 A35	Editorial, text, and format changes were made of an administrative nature to conform with conventions used in NUREG-1431.	3.4.17	3.2
3.4 A36	Bases for the CTS were deleted.	N/A	N/A
3.4 A37	A CTS required action to place the plant in a cold shutdown condition under certain conditions that was duplicated in another CTS section was deleted.	N/A	3.2.2
SECTION 3.5 - EMERGENCY CORE COOLING SYSTEM (ECCS)			
3.5 A1	Editorial, text, and format changes were made of an administrative nature to conform with conventions used in NUREG-1431.	3.5	3.3, 4.1, 4.5
3.5 A2	CTS identification of OPERABILITY requirements for essential features of ECCS accumulators were not retained in ITS since these requirements are encompassed by the ITS definition of OPERABILITY.	N/A	3.3.1.1
3.5 A3	The function of certain valves required by CTS to be in specific positions was identified in the ITS SR as descriptive information.	3.5.2	4.5.2.1
3.5 A4	The applicability of CTS requirements for ECCS were converted to ITS MODES.	3.5.1, 3.5.2, 3.5.3	3.3.1

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.5 A5	Not Used	N/A	N/A
3.5 A6	A SR was added to CTS in ITS to reference currently required code testing for the ECCS pumps.	3.5.2	3.3.1.1
3.5 A7	A CTS SR to initiate testing with a "test signal" was modified in ITS to inject a simulated or actual signal.	3.5.2	4.5.1.1
3.5 A8	A CTS SR to verify that automatic valves have completed their travel was restated in ITS to verify valves in the flow path not locked, sealed, or otherwise secured in position actuate to the correct position.	3.5.2	4.5.1.2
3.5 A9	Bases for the CTS were deleted.	N/A	N/A
3.5 A10	A CTS allowance to restore power or air supply to certain valves was restated as a condition in ITS	3.5.1, 3.5.2	3.3.1.2
3.5 A11	Not Used	N/A	N/A
3.5 A12	A Note was added to ITS SR 3.5.3.1 to permit alignment of RHR for shutdown cooling consistent with current interpretation of CTS.	3.5.3	3.3.1.3
3.5 A13	The applicability of CTS requirements for the Refueling Water Storage Tank (RWST) were converted to ITS MODES.	3.5.4	3.3.1
3.5 A14	Not Used	N/A	N/A

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Discussion of Change	Summary of Change	ITS Section	CTS Section
SECTION 3.6 - CONTAINMENT			
3.6 A1	Editorial, text, and format changes were made of an administrative nature to conform with conventions used in NUREG-1431.	3.6	1.0, 3.3, 3.6, 4.4, 4.1, 3.3, 4.5
3.6 A2	The CTS requirement for containment integrity was restated from the negative to the positive in ITS.	3.6.1	3.6.1
3.6 A3	A specific SR was added in ITS to reference existing CTS requirements for tendon surveillances and structural tests.	3.6.1	4.4.4
3.6 A4	A requirement for leak testing of valves pressurized by the penetration pressurization system was not retained as a separate surveillance from the existing requirement to leak test containment isolation valves.	3.6.1	3.6.1
3.6 A5	A specific SR was added in ITS to reference existing CTS requirements for leakage testing.	3.6.1	4.4.1
3.6 A6	A note was added in ITS to permit airlock door entry and exit to repair the airlock door. This note is consistent with CTS required actions. A note was added to ITS Actions to reference ITS 3.6.1 when airlock leakage results in exceeding the allowed containment leakage.	3.6.2	3.6.1
3.6 A7	The Frequency for the SR in ITS for airlock testing was changed from six months in CTS to "in accordance with 10 CFR 50, Appendix J, Option A, as modified by approved exemptions."	3.6.2	4.4.1

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.6 A8	The CTS definition for containment integrity was modified in ITS to provide a separate LCO for containment isolation valves.	3.6.3	3.6.1
3.6 A9	The CTS was revised to add a note in ITS permitting separate condition entry for each inoperable containment penetration flow path consistent with current interpretation of CTS.	3.6.3	3.6.1
3.6 A10	A note was added in ITS to require entry into the applicable conditions and required actions for systems rendered inoperable that is consistent with current interpretation of CTS.	3.6.3	3.6.1
3.6 A11	A note was added to ITS Actions to reference ITS 3.6.1 when isolation valve leakage results in exceeding the allowed containment leakage.	3.6.3	3.6.1
3.6 A12	A CTS required action to restore an inoperable containment isolation valve to OPERABLE status was not retained in ITS since this requirement is adequately stated in ITS Section 3.0	N/A	3.6.1
3.6 A13	Specific CTS requirements for testing of containment purge, pressurization, and vacuum relief valves and CTS testing requirements for other isolation valves were incorporated into one ITS SR stated in accordance with ITS writing standards at a Frequency consistent with the CTS requirements.	3.6.3	3.6.4.3, 4.4.2
3.6 A14	Bases for the CTS were deleted.	N/A	N/A
3.6 A15	The applicability of CTS requirements for containment cooling systems were converted to ITS MODES.	3.6.6	3.3.2.1

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.6 A16	CTS identification of OPERABILITY requirements for essential features of containment cooling components were not retained in ITS since these requirements are encompassed by the ITS definition of OPERABILITY.	N/A	3.3.2.1
3.6 A17	CTS OPERABILITY requirements for four containment fan coolers were revised to apply to two trains of two coolers in ITS.	3.6.6	3.3.2.1
3.6 A18	A note requiring entry into applicable condition and required actions for the Isolation Valves Seal Water (IVSW) System was added to ITS 3.6.3 actions consistent with current CTS requirements for containment integrity.	3.6.3	3.6.1
3.6 A19	A SR was added to CTS in ITS to reference currently required code testing for the containment spray pumps.	3.6.6	4.5.1
3.6 A20	The applicability of CTS requirements for the spray additive system was converted to ITS MODES.	3.6.7	3.3.2.1
3.6 A21	Not Used	N/A	N/A
3.6 A22	A CTS requirement to satisfy containment leakage requirements was not separately retained in ITS since ITS SRs 3.6.1.1 and 3.6.1.3 encompass the same requirement.	3.6.1	1.7
3.6 A23	Not Used	N/A	N/A
3.6 A24	A SR was added to CTS in ITS to reference currently required code testing for IVSW valves.	3.6.8	4.4.2
3.6 A25	Not Used	N/A	N/A

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.6 A26	Notes were added to the CTS airlock testing requirements that explicitly state in ITS 3.6.2.1 what is implicitly required in CTS.	3.6.2	4.4.1
3.6 A27	CTS requirements for sampling NaOH concentration were restated in ITS in accordance with ITS writing standards.	3.6.7	4.1, 3.3.2.1
3.6 A28	CTS identification of OPERABILITY requirements for essential features of IVSW components were not retained in ITS since these requirements are encompassed by the ITS definition of OPERABILITY.	N/A	3.3.6.1
3.6 A29	The CTS was modified to specifically add the requirement to evaluate the containment leakage rate in ITS for certain inoperable conditions of the airlock.	3.6.2	3.6.1
SECTION 3.7 - PLANT SYSTEMS			
3.7 A1	Editorial, text, and format changes were made of an administrative nature to conform with conventions used in NUREG-1431.	3.7	3.4, 4.1, 4.7, 4.8, 6.9, 3.3, 3.15, 4.15, 3.8, 5.4, 3.12, 3.13, 3.14, 4.13, 4.14
3.7 A2	The applicability of CTS requirements for the Main Steam Safety Valves (MSSVs) was converted to ITS MODES.	3.7.1	3.4.1

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.7 A3	CTS identification of OPERABILITY requirements for essential features of MSSV components were not retained in ITS since these requirements are encompassed by the ITS definition of OPERABILITY.	N/A	3.4.1
3.7 A4	A CTS requirement for closure time of the Main Steam Isolation Valves (MSIVs) was retained in ITS SR 3.7.2.1 rather than in the ITS LCO, in accordance with ITS writing standards.	3.7.2	3.4.1
3.7 A5	The CTS SR for testing MSIVs was clarified in ITS to require that the test be performed utilizing an actuated or simulated actuation signal.	3.7.2	4.7.1
3.7 A6	Bases for the CTS were deleted.	N/A	N/A
3.7 A7	CTS identification of OPERABILITY requirements for essential features of AFW components were not retained in ITS since these requirements are encompassed by the ITS definition of OPERABILITY. The CTS LCO requirements for AFW were restated in ITS LCO 3.7.4 in presentation only.	3.7.4	3.4.1
3.7 A8	The CTS Condition for inoperable "essential features" was restated in ITS as inoperable flow paths.	3.7.4	3.4.3
3.7 A9	CTS requirements to report certain inoperable conditions to the NRC were not retained in ITS as duplicating 10 CFR 50.73 reporting requirements.	N/A	3.4.3
3.7 A10	The applicability of CTS requirements for the AFW System was converted to ITS MODES.	3.7.4	3.4.4
3.7 A11	Not Used	N/A	N/A

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.7 A12	CTS details relating to acceptance of SR testing were not retained in the ITS.	N/A	4.8.4
3.7 A13	The CTS SR for testing AFW valves was clarified in ITS to require that the test be performed utilizing an actuated or simulated actuation signal.	3.7.4	4.8.3
3.7 A14	The CTS requirement for an unlimited supply of water in the lake was clarified in ITS as a backup water source to the condensate storage tank (CST).	3.7.5	3.4.1
3.7 A15	CTS identification of OPERABILITY requirements for essential features of the CST were not retained in ITS since these requirements are encompassed by the ITS definition of OPERABILITY.	N/A	3.4.1
3.7 A16	CTS identification of OPERABILITY requirements for essential features of Component Cooling Water (CCW) components were not retained in ITS since these requirements are encompassed by the ITS definition of OPERABILITY.	N/A	3.3.3.1
3.7 A17	CTS OPERABILITY requirements for the specific Service Water System (SWS) components of two (2) SWS trains were revised to apply to two trains of SWS in ITS.	3.7.7	3.3.4.1
3.7 A18	CTS identification of OPERABILITY requirements for lake water and essential features associated with the lake were not retained in ITS since these requirements are encompassed by the ITS definition of OPERABILITY.	3.7.8	3.4.3
3.7 A19	CTS OPERABILITY requirements for active and shared components of the Control Room Air Conditioning System were revised to apply to two trains of Control Room Emergency Air Filtration System (CREFS) in ITS.	3.7.9	3.15.1

MATRIX OF ADMINISTRATIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.7 A20	The applicability of CTS requirements for the CREFS and the Control Room Emergency Air Temperature Control (CREATC) was converted to ITS MODES.	3.7.9, 3.7.10	3.15, 4.15
3.7 A21	A specific CTS requirement that the CREFS and CREATC be OPERABLE prior to exceeding 200°F was not retained in ITS since this requirement is adequately stated in ITS Section 3.0.	N/A	3.15.2
3.7 A22	The Frequency of CTS SRs for the CREFS was converted to ITS in accordance with the change in the definition of STAGGERED TEST BASIS from the CTS to the ITS.	3.7.9	4.15
3.7 A23	A SR was added to CTS in ITS to reference currently required ventilation filter testing for the CREFS.	3.7.9	4.15
3.7 A24	CTS OPERABILITY requirements for active and shared components of the CREATC were revised to apply to two trains of CREATC in ITS.	3.7.10	3.15
3.7 A25	Not Used	N/A	N/A
3.7 A26	The CTS requirements for the Fuel Building Air Cleanup System were restated in ITS LCO 3.7.11 in accordance with ITS writing standards. CTS identification of OPERABILITY requirements for specific filter system components were not retained in ITS since these requirements are encompassed by the ITS definition of OPERABILITY.	3.7.11	3.8.2
3.7 A27	CTS requirements for spent fuel pit boron concentration during refueling operations were clarified in ITS to apply to movement of spent fuel.	3.7.13	5.4.3

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.7 A28	The CTS MSSV SR was modified to allow entry into and operation MODE 3 prior to performance of ITS SR 3.7.1.1 to permit suitable plant operating conditions to perform the test.	3.7.1	4.1
3.7 A29	Not Used	N/A	N/A
SECTION 3.8 - ELECTRICAL POWER SYSTEMS			
3.8 A1	Editorial, text, and format changes were made of an administrative nature to conform with conventions used in NUREG-1431.	3.8	
3.8 A2	Not Used	N/A	N/A
3.8 A3	Clarifying information in the CTS encompassed by the definition of OPERABLE for the emergency diesel generators (EDGs) was not retained in ITS.	N/A	3.7.1
3.8 A4	Clarifying information in the CTS within a note was not retained in the ITS.	N/A	3.7.2
3.8 A5	Not Used	N/A	N/A
3.8 A6	Bases for the CTS were deleted.	N/A	N/A
3.8 A7	The CTS SR for performing an automatic start test of the diesel generators was clarified in ITS SR 3.8.1.14 to be initiated by an actual or simulated loss of AC power.	3.8.1	4.6.1

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.8 A8	Notes were added to CTS SRs in ITS permitting performance of a certain SR to satisfy another SR, allowing a modified start procedure, permitting gradual loading, allowing momentary transients, requiring testing of a single EDG at a time, requiring performance of one SR to be preceded by one of two other SRs, prohibiting testing in certain MODES, allowing a test to be preceded by a pre-lube, and allowing credit for an actual event.	3.8.1	4.6.1
3.8 A9	CTS identification of OPERABILITY requirements for certain components of the AC Power System were not retained in ITS since these requirements are encompassed by the ITS definition of OPERABILITY.	N/A	3.7.1
3.8 A10	The CTS was revised to add a note in ITS permitting separate condition entry for each inoperable EDG consistent with current interpretation of CTS.	3.8.1	3.7.1
3.8 A11	The CTS was revised to add a Condition in ITS to declare the EDG inoperable under certain conditions.	3.8.3	3.7.1
3.8 A12	CTS requirements for stored fuel, that are included in ITS SR 3.8.3.1, were not separately retained in ITS.	3.8.3	4.6.2
3.8 A13	CTS requirements for inoperable batteries and battery chargers were incorporated into required actions for inoperability of the DC Power System.	3.8.4	3.7.2
3.8 A14	A note was added to the CTS testing requirement allowing credit for an unplanned event to satisfy the SR in ITS.	3.8.4	4.6.3.6

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.8 A15	The CTS note allowing substitution of the battery performance test for the service test was modified in ITS in accordance with ITS writing standards.	3.8.4	4.6.3
3.8 A16	Notes precluding performance of testing on the batteries in MODES 1, 2, 3, and 4, and allowing credit for unplanned events were added in ITS consistent with current interpretation of CTS.	3.8.4	4.6.3.5
3.8 A17	A specific requirement for OPERABILITY of the AC Instrument Bus Electrical Power System was added in ITS that was previously implied by the CTS requirement for OPERABILITY of the AC Power System.	3.8.9	3.7.1
3.8 A18	Required Actions were added in ITS for inoperable trip elements of certain molded case circuit breakers that were consistent with the CTS Section 3.0.	3.8.9	3.7.1
3.8 A19	A Required Action was added in ITS to enter ITS LCO 3.0.3 when there is a loss of function for AC electrical power distribution systems. This is consistent with CTS 3.0 requirements.	3.8.9	3.7.1
3.8 A20	CTS requirements for the EDG 24 hour load test were restated in ITS in accordance with ITS writing standards.	3.8.1	4.6.1.5
3.8 A21	The CTS requirements for performance testing of the batteries were clarified in ITS SR 3.8.4.6 to require a performance "discharge" test.	3.8.4	4.6.3.5
3.8 A22	A required action was added in ITS to declare the battery inoperable immediately if certain cell parameters are not met. This change is consistent with current interpretation of CTS.	3.8.6	4.6.3

MATRIX OF ADMINISTRATIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.8 A23	Required Actions were added in ITS for inoperable DC and AC electrical distribution systems that were consistent with the CTS Section 3.0.	3.8.9	3.7.2
3.8 A24	Programmatic CTS requirements for diesel fuel oil were moved from CTS testing requirements to the ITS Diesel Fuel Oil Testing Program	5.5	4.1
SECTION 3.9 - REFUELING OPERATIONS			
3.9 A1	Editorial, text, and format changes were made of an administrative nature to conform with conventions used in NUREG-1431.	3.9	3.8, 4.1, 3.10, 3.6, 4.12
3.9 A2	The CTS requirement to maintain the reactor subcritical was not separately retained in ITS since this requirement is encompassed by the ITS requirement for shutdown margin (SDM) during refueling.	N/A	3.8.1
3.9 A3	Bases for the CTS were deleted.	N/A	N/A
3.9 A4	Not Used	N/A	N/A
3.9 A5	The CTS requirement for testing of the containment vent and purge system was clarified in ITS to require that each valve actuates to the isolation position on a simulated actuation signal.	3.9.3	3.8.1
3.9 A6	The CTS requirement for SDM to be maintained when containment integrity is not required when the reactor vessel head is removed was not separately retained in ITS since the SDM requirements are addressed in LCO 3.9.1.	3.9.3	3.6.1

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Discussion of Change	Summary of Change	ITS Section	CTS Section
3.9 A7	The CTS requirement for refueling cavity level was changed from a reference to Mean Sea Level to a distance above the reactor vessel flange.	3.9.4, 3.9.6	3.8.1
3.9 A8	The applicability of CTS requirements for the refueling cavity water level were converted to the ITS Applicability of CORE ALTERATIONS.	3.9.6	3.8.1
3.9 A9	Not Used	N/A	N/A
3.9 A10	A CTS requirement to "initiate work" to correct certain conditions was changed in ITS to a Completion Time of Immediately.	3.9.4	3.8.1
3.9 A11	The CTS requirements for OPERABILITY of the source range neutron monitors during refueling were restated in ITS in accordance with ITS writing standards.	3.9.2	3.8.1
SECTION 4.0 - DESIGN FEATURES			
4.0 A1	Editorial, text, and format changes were made of an administrative nature to conform with conventions used in NUREG-1431.	4.0	1.0, 5.1, 5.3, 5.4, 5.2, 5.5
4.0 A2	The CTS description of the site was clarified in ITS.	4.0	5.1
4.0 A3	References in the CTS were not retained in the ITS.	4.0	5.4
4.0 A4	The maximum uranium enrichment allowed in the CTS was restated in ITS to a total value that includes the CTS allowance for uncertainties.	4.0	5.4

MATRIX OF ADMINISTRATIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
SECTION 5.0 - ADMINISTRATIVE CONTROLS			
5.0 A1	Editorial, text, and format changes were made of an administrative nature to conform with conventions used in NUREG-1431.	5.0	1.0, 3.5, 3.8, 3.16, 4.1, 4.2, 4.4, 4.12, 4.15, 4.20, 6.1, 6.2, 6.3, 6.4, 6.5, 6.6, 6.8, 6.9, 6.10, 6.11, 6.12, 6.13, 6.14, 6.15, 6.16, 6.17
5.0 A2	The CTS approval authority for tests, experiments and modifications that affect nuclear safety was shifted to the Plant Manager or his designee in the ITS.	5.1.1	6.1.1
5.0 A3	A reference to update the Updated Final Safety Analysis Report (UFSAR) in accordance with 10 CFR 50.71(e) was not retained in ITS	N/A	6.2.1
5.0 A4	A CTS requirement for onsite reporting of health physics personnel was changed in ITS to restate "health physics personnel" to the "individuals who carry out radiation control functions."	5.2.1	6.2.1
5.0 A5	Certain CTS shift manning requirements that duplicate 10 CFR 50.54 were not retained in ITS.	N/A	6.2.3

MATRIX OF ADMINISTRATIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
5.0 A6	The CTS was modified with respect to the use of overtime to state the objective of working a 12 hour day and nominal 40 hour week, as a clarification in ITS.	5.2.2	6.2.3
5.0 A7	The CTS allowance for deviations from overtime guidelines was clarified in ITS to authorize deviations in accordance with approved procedures.	5.2.2	6.2.3
5.0 A8	Certain CTS requirements for maintaining procedures were not retained in ITS because the requirements duplicate the requirement to maintain the same procedures as listed in Regulatory Guide 1.33.	N/A	6.5.1.1.1
5.0 A9	Not Used	N/A	N/A
5.0 A10	Certain CTS requirements for maintaining procedures were not retained in ITS because the requirements duplicate the requirement in 10 CFR 50 and 10 CFR 73 to maintain the same procedures.	N/A	6.5.1.1.1
5.0 A11	Certain CTS requirements for maintaining procedures were not separately retained in ITS because the requirements are contained in the program requirements for the Offsite Dose Calculation Manual (ODCM) in ITS Section 5.4.1.	5.4.1	6.5.1.1.1
5.0 A12	An CTS requirement to obtain NRC approval of the ODCM prior to implementation was not retained in ITS, since the ODCM has already been approved and implemented.	N/A	6.16
5.0 A13	CTS requirements for processing changes to the ODCM were modified in presentation of administrative details in ITS.	5.5.1	6.16

MATRIX OF ADMINISTRATIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
5.0 A14	CTS requirements for evaluating changes to the ODCM were clarified in ITS to include evaluation against the requirements of 10 CFR 20.	5.5.1	6.16
5.0 A15	Not Used	N/A	N/A
5.0 A16	Certain CTS programs were revised to add a statement of applicability of SR 3.0.2 and/or 3.0.3 to the inspection frequencies.	5.5	4.4.4, 6.12
5.0 A17	Bases for the CTS were deleted.	N/A	N/A
5.0 A18	CTS requirements for reactor vessel material surveillance were not retained in ITS because they duplicate requirements in 10 CFR 50, Appendix H.	N/A	4.2.2
5.0 A19	The CTS requirements for application of the Inservice Testing (IST) Program to components were clarified in ITS to apply to pumps and valves.	5.5.8	4.0.1
5.0 A20	The CTS list of frequencies for the IST program was changed to add the frequency of "at least once per 731 days."	5.5.8	4.0.1
5.0 A21	CTS references to 10 CFR for reporting requirements were clarified in ITS to reference 10 CFR 50.4.	5.6	6.9
5.0 A22	Final Operating License conditions which require certain programs were duplicated in ITS for presentation consistency with NUREG-1431.	5.5	N/A
5.0 A23	A CTS reference for the annual radiological environmental operating report was clarified in ITS.	5.6.2	6.9.1.2.3

MATRIX OF ADMINISTRATIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
5.0 A24	A CTS statement that certain provisions of CTS Section 4.0 do not apply were not retained in ITS since the use and application of ITS render the provisions moot.	N/A	6.12
5.0 A25	The CTS requirements for content in the Core Operating Limits Report (COLR) were revised to add the boron concentration limit.	5.6.5	6.9.3.3
5.0 A26	Specific CTS methods for addressing and distribution of the submittal of the COLR to the NRC were revised in ITS to simply require submittal to the NRC.	5.6.5	6.9.3.3
5.0 A27	CTS requirements for performance of containment structural integrity tests were not retained in the ITS since the last required test has been performed.	N/A	4.4.4, 6.9.3.1
5.0 A28	Not Used	N/A	N/A
5.0 A29	CTS reporting requirements that duplicated the requirements of 10 CFR 50.72 and 10 CFR 50.73 were not retained in ITS.	N/A	6.6.1, 6.6.2
5.0 A30	Additional clarification of the duties of the Shift Technical Advisor were added in the ITS.	5.2.2	6.2.3
5.0 A31	CTS requirements for reporting occupational dose for maintenance activities were clarified in ITS.	5.6.1	6.9.1.2
5.0 A32	The CTS programs for the Reactor Coolant Flywheels and the Containment Leakage Rate Testing Program were modified in presentation in ITS to be consistent with other ITS programs.	5.5.7, 5.5.16	4.2.3, 6.12

MATRIX OF ADMINISTRATIVE CHANGES

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Discussion of Change	Summary of Change	ITS Section	CTS Section
5.0 A33	CTS requirements for explosive gas and storage of radioactivity were consolidated into a program in ITS.	5.5.12	3.16.2, 3.16.4, 3.16.5, 4.20.2, 4.20.4, 4.20.5
5.0 A34	The CTS reporting requirement for the Containment Tendon Surveillance Program was clarified in ITS to indicate when the report is required to be submitted.	5.6.7	6.9.3.1
5.0 A35	Introductory information in the CTS related to procedures was not retained in the ITS.	N/A	6.5.1
5.0 A36	The personnel exposure and monitoring reporting requirements in the CTS were modified to reflect the revised 10 CFR 20 requirements.	5.6.1	6.9.1.2.1
5.0 A37	The CTS term "health physics" individuals was changed to "radiation control" individuals.	5.2.1, 5.2.2, 5.7.1	6.2.1, 6.2.3, 6.13
5.0 A38	CTS requirements for testing the EDG fuel oil were consolidated into the ITS Diesel Fuel Oil Testing Program.	5.5.13	4.1.2
RELOCATED SPECIFICATIONS			
REL A1	Editorial, text, and format changes were made of an administrative nature to conform with conventions used in NUREG-1431.	N/A	N/A
REL A2	Bases for the CTS were deleted.	N/A	N/A

United States Nuclear Regulatory Commission
Attachment V to Serial: RNP-RA/97-0223
(4 Pages)

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

CORRECTIONS TO PREVIOUS MATRICES OF CHANGES

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

Sheet 3 of 8

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 actuation of each sequenced load block is within ± 0.5 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

RELOCATED DETAILS MATRIX

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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	TRM	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

RELOCATED DETAILS MATRIX

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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	TRM	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