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SUBJECT: Forwards most recent changes to PVNGS Improved TS (ITS) identified during telcons w/NRC. Summary tables providing listed types of changes re ITS conversion, encl.

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102-04078 -JML/SAB/TNW  
February 12, 1998

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2 and 3  
Docket Nos. STN 50-528/529/530  
Improved Technical Specification (ITS) Changes**

Enclosed please find the most recent changes to the PVNGS ITS. The changes were identified during phone conversations with the NRC staff to discuss the PVNGS responses to the NRC Requests for Additional Information (RAI's) and during reviews by the PVNGS staff. Enclosure 1 contains the latest revision of the five ITS Summary Tables that reflect the enclosed changes to the ITS packages. Enclosure 2 is a summary of enclosed ITS changes. Enclosure 3 contains the replacement pages for the ITS packages. The Summary Tables provide the following types of changes identified in the ITS conversion:

- Administrative Changes (A)
- More Restrictive Changes (M)
- Relocated Details (LA)
- Less Restrictive Changes (L)
- Relocated Specifications (R)

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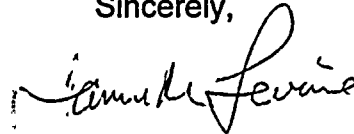




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Improved Technical Specification (ITS) Changes  
Page 2

Please contact Mr. Scott Bauer at (602) 393-5978 if you have any questions or would like additional information regarding this matter.

Sincerely,



GRO/SAB/TNW/

Enclosure 1 Five ITS Summary Tables  
Enclosure 2 Summary of Enclosed ITS Changes  
Enclosure 3 Replacement Pages for ITS Packages

cc: E. W. Merschoff (w/o enclosures)  
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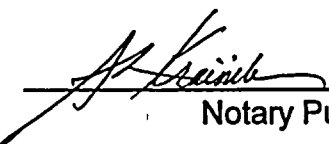


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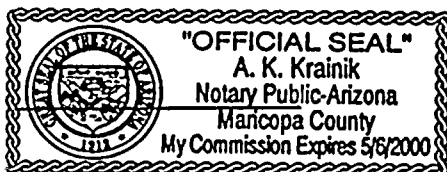
I, J. M. Levine, represent that I am Senior Vice President - Nuclear, Arizona Public Service Company (APS), that the foregoing document has been signed by me on behalf of APS with full authority to do so, and that to the best of my knowledge and belief, the statements made therein are true and correct.

  
\_\_\_\_\_  
J. M. Levine

Sworn To Before Me This 12<sup>th</sup> Day Of February, 1998.

  
\_\_\_\_\_  
Notary Public

My Commission Expires



50-528

PALO VERDE 1

APSCO

FIVE ITS SUMMARY TABLES- ENCLOSURE 1

REC'D W/LTR DTD 2/12/98...9802230070

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**ENCLOSURE 1**

**Five ITS Summary Tables**



Table of PVNGS Administrative Changes (A)

Discussion of Change	Description	CTS Section	ITS Section
1.0 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability.	Section 1.0	Section 1.0
1.0 A.2	Clarifies the definition of CHANNEL CALIBRATION by directing testing of required interlocks and displays.	Definitions CHANNEL CALIBRATION	Definitions CHANNEL CALIBRATION
	Clarifies the definition of CHANNEL FUNCTIONAL TEST by directing testing of required interlocks and displays.	Definitions CHANNEL FUNCTIONAL TEST	Definitions CHANNEL FUNCTIONAL TEST
1.0 A.3	Provides a more accurate description of CHANNEL FUNCTIONAL TEST for Digital Computer Channels than exists in the CTS by more accurately describing what is really performed.	Definitions CHANNEL FUNCTIONAL TEST	Definitions CHANNEL FUNCTIONAL TEST
1.0 A.4	Deletes the CTS definition of CONTAINMENT INTEGRITY because the term is not used in ITS.	Definitions CONTAINMENT INTEGRITY	Definitions
1.0 A.5	Deletes the word "conservative" from the definition of CORE ALTERATIONS to avoid potential confusion since there is no reference to what "conservative" means as it relates to CORE ALTERATIONS.	Definitions CORE ALTERATIONS	Definitions CORE ALTERATIONS





Discussion of Change	Description	CTS Section	ITS Section
1.0 A.6	Deletes the definition of Frequency Notation which is no longer required since ITS lists the specific frequencies in the SRs.	Definitions FREQUENCY NOTATION	Definitions
	Deletes CTS Table 1.1 which lists the Frequency Notations. These items are no longer required since ITS lists the specific frequencies in the SRs.	Section 1.0 Table 1.1	Section 1.0
1.0 A.7	Deletes several CTS Definitions because they are not used in either the LCOs or SRs: GASEOUS RADWASTE SYSTEM, MEMBER(S) OF THE PUBLIC, PURGE - PURGING, REPORTABLE EVENT, SITE BOUNDARY, SOFTWARE, SOURCE CHECK, UNRESTRICTED AREA, VENTILATION EXHAUST TREATMENT SYSTEM, VENTING	Definitions	Definitions
1.0 A.8	Combines three CTS definitions (IDENTIFIED LEAKAGE, PRESSURE BOUNDARY LEAKAGE, and UNIDENTIFIED LEAKAGE) into one compound ITS definition called LEAKAGE.	Definitions	Definitions LEAKAGE
1.0 A.9	Changes the definition of REFUELING by deleting a portion of the CTS definition, relocating some of the content and adding a new segment. This change removes possible confusion or ambiguity associated with the term	Definitions REFUELING	Definitions REFUELING
1.0 A.10	Changes the definition of the word OPERABLE to clarify that the term addresses safety functions and does not encompass non-safety functions that the system may also perform.	Definitions OPERABLE	Definitions OPERABLE
1.0 A.11	Revises the definition of STAGGERED TEST BASIS from dividing the number of systems, components, etc. into the interval, to multiplying the number of systems, components, etc. by the interval to determine the Surveillance Frequency.	Definitions STAGGERED TEST BASIS	Definitions STAGGERED TEST BASIS
1.0 A.12	Not Used	N/A	N/A



Discussion of Change	Description	CTS Section	ITS Section
1.0 A.13	Adds a footnote to MODES 4 and 5 in CTS Table 1.2 that requires all reactor head closure bolts to be fully tensioned.	Section 1.0 Table 1.2	Section 1.0 Table 1.1-1 Note b
1.0 A.14	Adds three new sections to Technical Specifications to aid in the understanding and use of the new format and presentation style of ITS: 1.2 - Logical Connectors, 1.3 - Completion Times and 1.4 - Frequency.	Section 1.0	Sections 1.2, 1.3 and 1.4
1.0 A.15	Modifies the CTS definition of DOSE EQUIVALENT I-131 to reference ICRP-30, Supplement to Part 1, page 192-212, per letter 102-03717-WLS/AKK/NLT, dated June 17, 1996. This change is characterized as administrative because the change reflects the approved TS Amendments 109, 101 and 81 to Units 1, 2, and 3, respectively.	Definitions  DOSE EQUIVALENT I- 131	Definitions  DOSE EQUIVALENT I- 131
2.0 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability.	Section 2.0	Section 2.0
2.0 A.2	Requirements of CTS 6.7.1 are moved to ITS 2.2, SL Violation.	Section 6.7.1	Section 2.2
2.0 A.3	Adds a reference to 10 CFR 50.72, which provides notification requirements.	Section 6.7.1.a	Section 2.2.3
2.0 A.4	Deletes specification of the details to be included in a required Safety Limit Violation Report and instead references 10 CFR 50.73 which provides the details of the content of the required LER.	Sections 6.7.1.b 6.7.1.c	Section 2.2.5
3.0 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability.	Section 3.0	Section 3.0
3.0 A.2	Moves the phrase "upon failure to meet the LCO..." to LCO 3.0.2 and replaces it with "...as provided in LCO 3.0.2 and LCO 3.0.7."	LCO 3.0.1	LCO 3.0.2



Discussion of Change	Description	CTS Section	ITS Section
3.0 A.2	Adds LCO 3.0.7 to provide clarification on the use of Special Test Exception (STE) LCOs where applicable.	Section 3.0	LCO 3.0.7
3.0 A.3	Eliminates the details of definition of Noncompliance with a Specification.	LCO 3.0.2	LCO 3.0.2
3.0 A.4	Provides additional clarification that an Action may also be exited if the LCO is no longer applicable.	LCO 3.0.2	LCO 3.0.2
	Requires that Actions be complete if so stated in the individual Specification.	LCO 3.0.2	LCO 3.0.2
3.0 A.5	In the matter of initiating a required shutdown, ITS provides clarification by specifying when the LCO is applicable instead of the CTS approach which provides an exception to specify when the LCO is not applicable.	LCO 3.0.3	LCO 3.0.3
	In the matter of initiating a required shutdown, ITS changes the time required to be in MODES 3 and 5 to be consecutive total time.	LCO 3.0.3	LCO 3.0.3
3.0 A.6	ITS explicitly states that the shutdown is not required to be completed if required actions are completed that allow operation to continue under an LCO or if the LCO conditions are met.	LCO 3.0.3	LCO 3.0.3
	Does not specify that the Completion Time for actions taken to exit 3.0.3 are measured from the time of failure to meet the LCO (this information is detailed in ITS 1.3).	LCO 3.0.3	LCO 3.0.3
3.0 A.7	ITS explicitly allows MODE changes as part of a shutdown of the unit in addition to MODE changes to comply with LCO Actions.	LCO 3.0.4	LCO 3.0.4
3.0 A.8	Not Used	N/A	N/A



Discussion of Change	Description	CTS Section	ITS Section
3.0 A.9	Provides clarification that failure to meet the specified SRs whether the failure is experienced during the performance of the Surveillance or between performances of the Surveillance constitutes failure to meet the LCO.	LCO 4.0.1	SR 3.0.1
3.0 A.10	Defines the start of the Surveillance Interval as the previous performance or the time a specified condition of the Frequency is met and provides clarification that exceptions to the 25% extension allowance are stated in the individual Specifications.	LCO 4.0.2	SR 3.0.2
3.0 A.11	Provides clarification to the intent of the CTS by allowing MODE changes as part of a shutdown.	LCO 4.0.4	SR 3.0.4
3.0 A.12	Changes the time at which the LCO is declared not met from immediately (with a 24 hours allowance to comply with the Action Requirements) to allowing 24 hours to perform the Surveillances before declaring the LCO not met.	LCO 4.0.4	SR 3.0.4
3.1.1 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability.	LCO 3.1.1.1	LCO 3.1.1
3.1.1 A.2	Removes cross reference note to a Special Test Exception because cross reference notes are not used in ITS or NUREG-1432.	LCO 3.1.1.1 Note *	LCO 3.1.1
3.1.1 A.3	Changes the required time to initiate boration when the SHUTDOWN MARGIN is less than the value in the COLR from "immediately" to "within 15 minutes."	LCO 3.1.1.1 Action	LCO 3.1.1 Action A
3.1.2 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability.	LCO 3.1.1.2	LCO 3.1.2
3.1.2 A.2	Removes cross reference note to Special Test Exceptions because cross reference notes are not used in ITS or NUREG-1432.	LCO 3.1.1.2 Note *	LCO 3.1.2
3.1.2 A.3	Changes the required time to initiate boration when the SHUTDOWN MARGIN is less than the value in the COLR from "immediately" to "within 15 minutes."	LCO 3.1.1.2 Action a	LCO 3.1.2 Action A





Discussion of Change	Description	CTS Section	ITS Section
3.1.2 A.4	Changes the required time to vary CEA positions and/or initiate boration when $K_{N-1}$ is greater than or equal to .99 from "immediately" to "within 15 minutes."	LC0 3.1.1.2 Action b	LC0 3.1.2 Action B
3.1.2 A.5	Deletes the "or" from "and/or" in regarding to initiating boration when $K_{N-1}$ is greater than or equal to .99.	LC0 3.1.1.2 Action b	LC0 3.1.2 Action B
3.1.3 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LC0 3.1.1.2	LC0 3.1.3
3.1.4 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LC0 3.1.1.3	LC0 3.1.4
3.1.4 A.2	Removes cross-reference note to Special Test Exceptions because cross reference notes are not used in ITS or NUREG-1432.	LC0 3.1.1.3 Note *	LC0 3.1.4
3.1.4 A.3	Modifies the Applicability of SR 3.1.4.1 and 3.1.4.2 by the use of a NOTE which states that the SRs are not required to be performed prior to MODE 2 entry ( $K_{eff} \geq .99$ ).	LC0 3.1.1.3	SR 3.1.4.1 SR 3.1.4.2
3.1.4 A.4	Expands the discussion regarding extrapolation and/or compensation of MTC measured values.	SR 4.1.1.3.1	SR 3.1.4.2 NOTE 2
3.1.5 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LC0 3.1.3.1 LC0 3.1.3.2	LC0 3.1.5
3.1.5 A.2	Removes cross reference note to Special Test Exceptions because cross reference notes are not used in ITS or NUREG-1432.	LC0 3.1.3.1 Note *	LC0 3.1.5
3.1.5 A.3	Removes cross reference note to 3.1.3.1, 3.1.3.5, 3.1.3.6 and 3.1.3.7 because cross reference notes are not used in ITS or NUREG-1432.	LC0 3.1.3.2 Action c	LC0 3.1.5



Discussion of Change	Description	CTS Section	ITS Section
3.1.5 A.4	Deletes the Action requirement addressing drop time exceeding the limit and adds a Surveillance to verify drop time "prior to reactor criticality" that effectively prevents entering the MODES in which the deleted Action applied (MODE 1 and 2).	LCO 3.1.3.4 Action a	SR 3.1.5.5
3.1.5 A.5	Deletes separate Action to address the situation where a full-length CEA is inoperable and trippable since the pertinent requirements are addressed in ITS actions applicable to all CEAs.	LCO 3.1.3.1 Action d	LCO 3.1.5 LCO 3.1.7
3.1.5 A.6	Deletes separate Action to address the situation where a part length CEA is inoperable and inserted in the core since the pertinent requirements are addressed in ITS sections.	LCO 3.1.3.1 Action e	LCO 3.1.5 LCO 3.1.8
3.1.5 A.7	Cross-reference of CTS 3.1.3.6 and 3.1.3.7 is removed since it is not necessary or used in the ITS.	3.1.3.1	3.1.5
3.1.5 A.8	Additional descriptive language is added for CEA misalignment to ITS 3.1.5 Action A.	3.1.3.1	3.1.5
3.1.6 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.1.3.5	LCO 3.1.6
3.1.6 A.2	Removes cross reference note to Special Test Exceptions because cross reference notes are not used in ITS or NUREG-1432.	LCO 3.1.3.5 Note *	LCO 3.1.6
3.1.6 A.3	Changes the MODE applicability from MODES 1 and 2 with $K_{eff} \geq 1.0$ to simply MODES 1 and 2 with any CEA not fully withdrawn.	LCO 3.1.3.5	LCO 3.1.3.6
3.1.6 A.4	Removes the requirement to determine that each shutdown CEA is withdrawn within 15 minutes prior to withdrawal of any CEAs in regulating groups during an approach to criticality since it is still required by LCO 3.0.4.	SR 4.1.3.5	LCO 3.1.6



Discussion of Change	Description	CTS Section	ITS Section
3.1.6 A.5	Deletes a cross reference for an inoperable CEA to another LCO and replaces it with the same Action that requires that the plant be in MODE 3 within 6 hours.	LCO 3.1.3.5 Action	LCO 3.1.6 Action B
3.1.7 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.1.3.6	LCO 3.1.7
3.1.7 A.2	Removes cross reference note to Special Test Exceptions because cross reference notes are not used in ITS or NUREG-1432.	LCO 3.1.3.6 Note *	LCO 3.1.7
3.1.7 A.3	Changes the MODE applicability requirements and adds a NOTE to SR 3.1.7.1 that states that the SR is not required to be performed prior to MODE 2 entry which maintains the CTS requirements.	LCO 3.1.3.6	SR 3.1.7.1
3.1.8 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.1.3.7	LCO 3.1.8
3.1.8 A.2	Removes cross reference note to Special Test Exceptions because cross reference notes are not used in ITS or NUREG-1432.	LCO 3.1.3.7 Note *	LCO 3.1.8
3.1.8 A.3	Deletes the reference to part-length CEA groups be maintained within limits "with COLSS in service or out of service" since the insertion limits do not change based on the service status.	LCO 3.1.3.7	LCO 3.1.8
3.1.8 A.4	Deletion of the reference to CTS 4.1.3.1.2 since it is not necessary to exempt condition entry to perform the SR.	3.1.3.7	3.1.8
3.1.9 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.10.1	LCO 3.1.9
3.1.9 A.2	Changes the required time to initiate boration from "immediately" to "within 15 minutes."	LCO 3.10.1 Actions a, b	3.1.9 Action A



Discussion of Change	Description	CTS Section	ITS Section
3.1.9 A.3	Changes the reference to requirements of SDM Specifications (3.1.1.2) to reflect its relocation (3.1.6 and 3.1.7).	LCO 3.10.1	LCO 3.1.9
3.1.9 A.4	Deletion of the reference to shutdown margin, it is not needed since it is based on CEA position and not applicable to this STE.	3.10.1	3.1.9
3.1.10 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.10.2	LCO 3.10.1
3.1.11 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.10.4	LCO 3.11.1
3.1.11 A.2	Adds specification of a Completion Time (15 minutes) for the Action to return LHR and DNBR to within Limits.	LCO 3.10.4 Action	LCO 3.1.11
3.2.1 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.2.1	LCO 3.2.1
3.2.1 A.2	Not Used	N/A	N/A
3.2.2 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.2.2	LCO 3.2.2
3.2.2 A.2	Removes cross reference note to Special Test Exceptions because cross reference notes are not used in ITS or NUREG-1432.	LCO 3.2.2	LCO 3.2.2
3.2.2 A.3	Deletes the exception to Specification 4.0.4 since the surveillance is required once after each fuel load with thermal power greater than 40% and not required to be performed prior to entry into the applicability.	4.2.2.1	3.2.2





Discussion of Change	Description	CTS Section	ITS Section
3.2.3 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.2.3	LCO 3.2.3
3.2.3 A.2	Removes cross reference note to Special Test Exceptions because cross reference notes are not used in ITS or NUREG-1432.	LCO 3.2.3	LCO 3.2.3
3.2.3 A.3	Combines the 2 hours allowed to verify that the AZIMUTHAL POWER TILT is within its limits with the additional 2 hours allowed to reduce THERMAL POWER to less than 50% if the verification is not completed as required into a single 4 hour requirement to reduce power.	LCO 3.2.3 Action b.2	LCO 3.5.3 Action B.1
3.2.4 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.2.4	LCO 3.2.4
3.2.5 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.2.7	LCO 3.2.5
3.2.5 A.2	Removes cross reference note to Special Test Exceptions because cross reference notes are not used in ITS or NUREG-1432.	LCO 3.2.7	LCO 3.2.5
3.3.1 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.3.1	LCO 3.3.1
3.3.1 A.2	Rewords the Surveillance Interval to use the ITS STAGGERED TEST BASIS but does not change the interval.	SR 4.3.1.3	SR 3.3.1.13
3.3.1 A.3	Rewords the Surveillance Requirement to use the term CHANNEL FUNCTIONAL TEST to capture the concept of the CTS terminology "logic for the bypasses" with equivalent intent.	SR 4.3.1.2	SR 3.3.1.12



Discussion of Change	Description	CTS Section	ITS Section
3.3.1 A.4	The LCO specifies the number of RPS trip and bypass removal channels required to be OPERABLE for each function in the associated table. CTS didn't include the number of channels required in the LCO statement because of the mix of equipment included in the CTS Table.	LCO 3.3.1	LCO 3.3.1
3.3.1 A.5	Adds a NOTE to the Specification Actions that states that separate condition entries are allowed for each RPS Function. The format of the ITS makes this NOTE necessary where in CTS the situation was clear without this note.	LCO 3.3.1	LCO 3.3.1 Actions NOTE
3.3.1 A.6	Rewords the statement regarding the number of inoperable automatic RPS trip channels compared to the total number of channels that require Action entry but does not change the requirement.	LCO 3.3.1 Table 3.3-1 Action 2	LCO 3.3.1 Action A
3.3.1 A.7	Rewords the statement regarding the number of inoperable automatic RPS trip channels compared to the minimum number of channels that require Action entry but does not change the requirement.	LCO 3.3.1 Table 3.3-1 Action 3	LCO 3.3.1 Action B
3.3.1 A.8	Removes the CHANNEL FUNCTIONAL TEST cross-reference from the table NOTE addressing the limited calibration to adjust instrumentation to agree with the calorimetric calculation since the calibration required is described in the SR.	LCO 3.3.1 Table 4.3-1 Note (2)	SR 3.3.1.4
3.3.1 A.9	Removes the words "steady state" from the phrase "Verify the total steady state RCS flow rate as indicated by each CPC is less than or equal to the actual RCS flowrate" because flow is always "steady state" under the test performance conditions.	LCO 3.3.1 Table 4.3-1 Note (7)&(8)	SR 3.3.1.2 SR 3.3.1.5
3.3.1 A.10	Removes the unneeded words "quarterly" and "current" from the phrase "The quarterly channel functional test shall include verification that the correct current values of addressable constants are installed in each operable CPC. Quarterly is the standard ITS frequency.	LCO 3.3.1 Table 4.3-1 Note (9)	SR 3.3.1.7



Discussion of Change	Description	CTS Section	ITS Section
3.3.1 A.11	Adds a new Action that requires entry into MODE 3 within 6 hours if the Completion Time for the prior Actions is not met instead of forcing entry into LCO 3.0.3. Both CTS and ITS require reports per 10CFR. ITS requires reports per 10CFR50.73, whereas, CTS requires reports per 10CFR50.72 and 10CFR50.73.	LCO 3.3.1	LCO 3.3.1 Action G
3.3.1 A.12	Eliminates reference to the RPS Logic and Actuation devices and the statement that the trip setpoint and setpoint allowable values are not applicable to the equipment. The format of the ITS makes this unnecessary.	Section 2.2 Table 2.2-1 Items II, III	LCO 3.3.1
3.3.1 A.13	Eliminates information related to low pressurizer pressure setpoints that is not necessary because it applies to a MODE in which the functions are not required to be OPERABLE.	Section 2.2 Table 2.2-1 Notation (2)  LCO 3.3.1 Table 3.3-1 Notation (b)	LCO 3.3.1
3.3.1 A.14	Changes the units of reference for the Reactor Coolant Flow-Low Rate Allowable Value from "psi/sec" to "psid/sec" with no change to the time dependent functional values.	Section 2.2 Item 1.A.7.a	LCO 3.3.1 Table 3.3.1-1 Functions 12, 13
3.3.1 A.15	Eliminates reference to the Core Protection Calculators since it is not a trip function and its outputs are included in the table.	LCO 3.3.1 Table 4.3-1	LCO 3.3.1 Table 3.3.1-1 Functions 14, 15
3.3.2 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.3.1 LCO 3.3.2	LCO 3.3.2



Discussion of Change	Description	CTS Section	ITS Section
3.3.2 A.2	The LCO specifies the number of reactor protective instrumentation channels and bypasses required to be OPERABLE for each function in the associated table. CTS didn't include the number of channels required in the LCO statement because of the mix of equipment included in the CTS Table.	LCO 3.3.1	LCO 3.3.2
3.3.2 A.3	Adds a NOTE to the Specification Actions that states that separate condition entries are allowed for each RPS Function. The format of the ITS makes this NOTE necessary where in CTS the situation was clear without this note.	LCO 3.3.1	LCO 3.3.2 NOTE
3.3.2 A.4	Rewords the Surveillance Frequency of the Reactor Trip RESPONSE TIME Surveillance to use the ITS STAGGERED TEST BASIS definition. The actual interval is not changed.	SR 4.3.1.3	SR 3.3.2.5
3.3.2 A.5	Rewords the Surveillance Requirement to use the term CHANNEL FUNCTIONAL TEST to capture the concept of the CTS terminology "logic for the bypasses" with equivalent intent.	SR 4.3.1.2	SR 3.3.2.3
3.3.2 A.6	Clarifies the intent of the breaker and CEA portion of the note regarding the protective system trip breakers in the closed position, CEA drive system capable of CEA withdrawal and fuel in the reactor vessel. Removes the reference to fuel in the reactor vessel as unnecessary due to the MODE definition in the ITS.	LCO 3.3.1 Table 3.3-1 Note (*)	LCO 3.3.2 Table 3.3.2-1 Note (a)
3.3.2 A.7	Rewords the statement regarding the number of inoperable automatic RPS trip channels compared to the total number of channels that require Action entry but does not change the requirement.	LCO 3.3.1 Table 3.3-1 Action 2	LCO 3.3.2 Action A
3.3.2 A.8	Rewords the statement regarding the number of inoperable automatic RPS trip channels compared to the minimum number of channels that require Action entry but does not change the requirement.	LCO 3.3.1 Table 3.3-1 Action 3	LCO 3.3.2 Action B





Discussion of Change	Description	CTS Section	ITS Section
3.3.2 A.9	Eliminates the NOTE reference to MODES since ITS provides this information elsewhere and CTS did not. Changes the reference to "setpoint value" by deleting the word "value."	Section 2.2 Table 2.2-1 Note (3)	LCO 3.3.2 Table 3.3.2-1 Note (b)
3.3.3 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.3.1 LCO 3.1.3.6	LCO 3.3.3
3.3.3 A.2	Rewords the statement regarding the number of CEAC channels required to be OPERABLE as a result of the restructuring of ITS but does not change the content.	LCO 3.3.1	LCO 3.3.3
3.3.3 A.3	Rewords the SR by replacing "Core Protection Calculators" with "CEACs" to clarify that the phrase applies to both CPCs and CEACs.	SR 4.3.1.5	LCO 3.3.3 Action D
3.3.3 A.4	Simplifies the wording regarding withdrawal of CEA groups to say "fully withdrawn and maintained full withdrawn" in place of referencing other Specifications.	LCO 3.3.1 Table 3.3-1 Action 6.b.2.a 6.b.2.c	LCO 3.3.3 Action B.2
3.3.3 A.5	Moves the SR requirement to increase the surveillance frequency on CEA alignment checks from the CEA Alignment SR to the CEAC LCO, the actual frequency remains unchanged.	LCO 3.3.1 Table 3.3-1 Action 6.a SR 4.1.3.1.1	LCO 3.3.3 Action A
3.3.3 A.6	Adds an Action that requires entry into MODE 3 within 6 hours if the other Completion Times are not met instead of forcing entry into LCO 3.0.3. Both CTS and ITS require reports per 10CFR. ITS requires reports per 10CFR50.73, whereas, CTS requires reports per 10CFR50.72 and 10CFR50.73.	LCO 3.3.1	LCO 3.3.3 Action E
3.3.3 A.7	Removes cross-reference note to Special Test Exceptions because cross reference notes are not used in ITS or NUREG-1432.	LCO 3.3.1 Table 3.3-1 Note (a)	LCO 3.3.3



Discussion of Change	Description	CTS Section	ITS Section
3.3.3 A.8	Eliminates reference to specific sub-sections regarding DNBR margin establishment since the referenced ITS section provides the necessary detail and sub-section reference is not required.	LCO 3.3.1 Table 3.3-1 Action 6.b.1	LCO 3.3.3 Action B
3.3.4 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.3.1	LCO 3.3.4
3.3.4 A.2	CTS LCO Applicability refers to a Table. ITS will not use a table format. Changes Applicability wording to clarify that the intent is "With any Reactor trip circuit Breakers (RTCBs) in the closed position and any CEA capable of withdrawal" and deletes the words "with fuel in the vessel" since the ITS definition of MODE makes them unnecessary.	LCO 3.3.1	LCO 3.3.4
3.3.4 A.3	The LCO specifies the number of reactor protective instrumentation channels and bypasses required to be OPERABLE for each function in the associated table. CTS didn't include the number of channels required in the LCO statement because of the mix of equipment included in the CTS Table.	LCO 3.3.1	LCO 3.3.4
3.3.4 A.4	Adds an Action that requires entry into MODE 3 within 6 hours if the other Completion Times are not met and therefor avoids the LCO 3.0.3 entry required by CTS which contains no specific Action to cover this condition.	LCO 3.3.1	LCO 3.3.4 Action E
3.3.4 A.5	Rewords the Action statement regarding the required number of OPERABLE channels to the perspective of the number of inoperable channels but does not change the requirements.	LCO 3.3.1 Actions	LCO 3.3.4 Action A
3.3.4 A.6	Rewords the Action statement regarding the conditions under which an inoperable RTCB may be closed to state the name of the Surveillance Test (CHANNEL FUNCTIONAL TEST) instead of referencing the SR number.	LCO 3.3.1 Table 3.3-1 Action 5	LCO 3.3.4 Action B
3.3.5 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.3.2	LCO 3.3.5



Discussion of Change	Description	CTS Section	ITS Section
3.3.5 A.2	Changes the wording of the ESFAS Instrumentation LCO to specify the number of OPERABLE channels in the LCO instead of using a table for this purpose.	LCO 3.3.2	LCO 3.3.5
3.3.5 A.3	Adds a NOTE to the Specification Actions that states that separate condition entries are allowed for each ESFAS Function. The format of the ITS makes this NOTE necessary where in CTS the situation was clear without this note.	LCO 3.3.2 Actions	LCO 3.3.5 Actions NOTE
3.3.5 A.4	Rewords the Surveillance Frequency of the ENGINEERED SAFETY FEATURES response time Surveillance to use the ITS STAGGERED TEST BASIS definition. The actual interval is not changed.	SR 4.3.2.3	SR 3.3.5.4
3.3.5 A.5	Rewords the statement regarding the number of inoperable ESFAS channels compared to the total number of channels that require Action entry but does not change the requirement.	LCO 3.3.2 Table 3.3-3 Action 13	LCO 3.3.5 Action A
3.3.5 A.6	Rewords the statement regarding the number of inoperable ESFAS channels compared to the minimum number of channels that require Action entry but does not change the requirement.	LCO 3.3.2 Table 3.3-3 Action 14	LCO 3.3.5 Action B
3.3.5 A.7	Adds an Action that requires entry into MODE 3 within 6 hours if the other Completion Times are not met instead of forcing entry into LCO 3.0.3. Both CTS and ITS require reports per 10CFR. ITS requires reports per 10CFR50.73, whereas, CTS requires reports per 10CFR50.72 and 10CFR50.73.	LCO 3.3.2	LCO 3.3.5 Action E
3.3.5 A.8	Rewords notation wording to refer to the setpoint instead of the setpoint value, clarifies that the setpoints increase until the normal value is reached, does not explicitly state that the setpoint reductions are accomplished manually and removes reference to MODES 3 and 4 and consistent with ITS table format.	LCO 3.3.2 Table 3.3-3 Note (a), (b)	LCO 3.3.5 Table 3.3.5-1 Note (a), (b)
3.3.5 A.9	Eliminates the LCO 3.0.4 exclusion because operation with a single channel is allowed for an unlimited period of time and ITS LCO 3.0.4 permits MODE changes in this condition.	LCO 3.3.2 Table 3.3-3 Action 13 Note *	LCO 3.3.5 Action A



Discussion of Change	Description	CTS Section	ITS Section
3.3.6 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.3.2	LCO 3.3.6
3.3.6 A.2	Changes the wording of the ESFAS Instrumentation LCO to specify the number of OPERABLE channels in the LCO instead of using a table for this purpose.	LCO 3.3.2	LCO 3.3.6
3.3.6 A.3	Adds a NOTE to the Specification Actions that states that separate condition entries are allowed for each ESFAS Function. The format of the ITS makes this NOTE necessary where in CTS the situation was clear without this note.	LCO 3.3.2 Actions	LCO 3.3.6 Actions NOTE
3.3.6 A.4	Rewords the statement regarding the number of inoperable ESFAS channels compared to the total number of channels that require Action entry but does not change the requirement.	LCO 3.3.2 Table 3.3-3 Action 12, 15, 16	LCO 3.3.5 Action A
3.3.7 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.3.2	LCO 3.3.7
3.3.7 A.2	Not Used	N/A	N/A
3.3.7 A.3	Includes ESFAS Loss of Voltage and Degraded Voltage functions and uses the terminology "function" instead of "and bypasses" which is inclusive.	LCO 3.3.2	LCO 3.3.7
3.3.7 A.4	Eliminates the use of a table with notes to specify Actions associated with an inoperable channel since the LCO presents singular Actions which apply to both Functions (Loss of Voltage and Degraded Voltage).	LCO 3.3.2 Table 3.3-3	LCO 3.3.7 Actions
3.3.7 A.5	Rewords the statement regarding the number of inoperable LOVS channels compared to the total number of channels that require Action entry but does not change the requirement.	LCO 3.3.2 Table 3.3-3 Action 13	LCO 3.3.7 Action A





Discussion of Change	Description	CTS Section	ITS Section
3.3.7 A.6	Rewords the statement regarding the number of inoperable LOVS channels compared to the minimum number of channels that require Action entry but does not change the requirement.	LCO 3.3.2 Table 3.3-3 Action 14	LCO 3.3.7 Action B
3.3.7 A.7	Eliminates reference to other Actions since the format of ITS makes them unnecessary.	LCO 3.3.2 Table 3.3-3 Action 19 (a), (b)	LCO 3.3.7 Actions
3.3.8 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.3.3.1	LCO 3.3.8
3.3.8 A.2	ITS Action clarifies the intent of CTS to enter Actions when both radiation monitors (RU-37 and RU-38) are inoperable.	LCO 3.3.3.1 Table 3.3-6 Action 25	LCO 3.3.8 Action A, B
3.3.8 A.3	Rewords the Action for the containment purge valve isolation system inoperable to eliminate the need to refer to a different section of the ITS for information.	LCO 3.3.3.1 Table 3.3-6 Action 25	LCO 3.3.8 Action A, C
3.3.8 A.4	Adds a clarifying NOTE to the Applicability of the LCO which states "Only required when the penetration is not isolated by at least one closed automatic valve, closed manual valve, or blind flange." This note is equivalent to the CTS applicability "When purge system is being used."	LCO 3.3.3.1 Table 3.3-6 NOTE #	LCO 3.3.8 NOTE
3.3.8 A.5	Rewords the Surveillance Frequency requirement for the radiation monitoring channel but does not change the frequency.	SR 4.3.3.1 Table 4.3-3 Inst. 1.C	SR 3.3.8.1
3.3.9 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.3.2 LCO 3.3.3.1	LCO 3.3.9



Discussion of Change	Description	CTS Section	ITS Section
3.3.9 A.2	Reworded the LCO to clarify the number of CREFAS channels required for operability.	LCO 3.3.3.1	LCO 3.3.9
3.3.9 A.3	Rewords the Surveillance Frequency of the ENGINEERED SAFETY FEATURES response time (CREFAS) Surveillance to use the ITS STAGGERED TEST BASIS definition. The actual interval is not changed.	SR 4.3.2.3	SR 3.3.9.6
3.3.9 A.4	Changes the Action wording to clarify the intent regarding both CREFAS Manual Trip, Actuation Logic or radiation monitor channels inoperable.	LCO 3.2 Table 3.3-3 Action 18	LCO 3.3.9 Action A, C
3.3.10 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.3.3.1 LCO 3.3.3.6	LCO 3.3.10
3.3.10 A.2	Adds a NOTE to the Specification Actions that states that separate condition entries are allowed for each PAM Function. The format of the ITS makes this NOTE necessary where in CTS the situation was clear without this note.	LCO 3.3.3.6	LCO 3.3.10 NOTE
3.3.10 A.3	Eliminates the Action statement in CTS that directs attention to Table 3.3-10 because it is unneeded due to the format of ITS.	LCO 3.3.3.6 Action a	LCO 3.3.10
3.3.11 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.3.3.5	LCO 3.3.11
3.3.11 A.2	Eliminates reference to a table for the Remote Shutdown System Surveillance Requirements since ITS format does not use a table for this purpose.	SR 4.3.3.5.a	SR 3.3.11.3
3.3.11 A.3	Adds a NOTE to the Specification Actions that states that separate condition entries are allowed for each PAM Function. The format of the ITS makes this NOTE necessary where in CTS the situation was clear without this note.	LCO 3.3.3.5	LCO 3.3.11 NOTE



Discussion of Change	Description	CTS Section	ITS Section
3.3.12 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.1.2.7 LCO 3.3.1	LCO 3.3.12
3.3.12 A.2	Changes the system name in the LCO from "startup channel high neutron flux alarm" to "Boron Dilution Alarm System (BDAS)" and replaces the word "both" with "two" for consistency with NUREG-1432.	LCO 3.1.2.7	LCO 3.3.12
3.3.12 A.3	Changes the Action Completion time to determine the RCS boron concentration from "when entering MODE 3, 4, 5 or 6, or at the time the alarm is determined to be inoperable" to "immediately" as a clarification to boron concentration not met during specified applicability.	LCO 3.1.2.7 Action a.1	LCO 3.3.12 Action A
3.3.12 A.4	Changes the Action Completion time to determine the RCS boron concentration from "when entering MODE 3, 4, 5 or at the time both alarms are determined to be inoperable" to "immediately" as a clarification.	LCO 3.1.2.7 Action b.1	LCO 3.3.12 Action B
3.3.12 A.5	Rewords the Surveillance Requirement Frequency for BDAS CHANNEL CHECKS to simplify it and eliminate the need for two intervals. The frequency of the SR is unchanged.	SR 4.1.2.7	SR 3.3.12.1
3.4.1 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.2.5 LCO 3.2.6 LCO 3.2.8	LCO 3.4.1
3.4.1 A.2	Removes cross reference note to a Special Test Exception because cross reference notes are not used in ITS or NUREG-1432.	LCO 3.2.6	LCO 3.4.1
3.4.1 A.3	Not Used	N/A	N/A
3.4.1 A.4	Modified the Pressurizer Pressure LCO to reflect the more restrictive limits specified in a proposed PVNGS license amendment (Letter 102-03717 dated June 17, 1996). This change is characterized as administrative because the change reflects approved TS Amendments 109, 101 and 81 to Units 1, 2, and 3, respectively.	LCO 3.2.8	LCO 3.4.1



Discussion of Change	Description	CTS Section	ITS Section
3.4.2 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LC0 3.1.1.4	LC0 3.4.2
3.4.2 A.2	Modifies the Action Completion time allowed to return RCS Cold Leg Temperature to $\geq 545^{\circ}\text{F}$ and reduce power to enter MODE 3 from 15 minutes and 15 minutes respectively to a total of 30 minutes without specification of sub-segments.	LC0 3.1.1.4 Action	3.4.2 Action A
3.4.3 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LC0 3.4.8.1	LC0 3.4.3
3.4.3 A.2	Removes cross reference note to a Special Test Exception because cross reference notes are not used in ITS or NUREG-1432.	LC0 3.4.8.1	LC0 3.4.3
3.4.3 A.3	Deletes the statement that a determination that the RCS remains acceptable for continued operations is required since it is implicit in the ITS Actions.	LC0 3.4.8.1 Action	LC0 3.4.3 Action A, C
3.4.4 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LC0 3.4.1.1	LC0 3.4.4
3.4.4 A.2	Removes cross reference note to a Special Test Exception because cross reference notes are not used in ITS or NUREG-1432.	LC0 3.4.1.1	LC0 3.4.4
3.4.5 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LC0 3.4.1.2	LC0 3.4.5
3.4.5 A.2	Removes cross reference note to a Special Test Exception because cross reference notes are not used in ITS or NUREG-1432.	LC0 3.4.1.2	LC0 3.4.5





Discussion of Change	Description	CTS Section	ITS Section
3.4.5 A.3	Describes the condition that defines inoperable, not in operation, or condition not met (one RCS loop inoperable) and splits the CTS Action into two separate Actions.	LCO 3.4.1.2 Action a	LCO 3.4.5 Action A, C
3.4.6 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.4.1.3	LCO 3.4.6
3.4.6 A.2	Removes cross reference note to a Special Test Exception because cross reference notes are not used in ITS or NUREG-1432.	LCO 3.4.1.3	LCO 3.4.6
3.4.6 A.3	Adds the statement "...no RCS loop or SDC train OPERABLE" to clarify the intent of "with no reactor coolant or shutdown cooling loop in operation."	LCO 3.4.1.3 Action b	LCO 3.4.6 Action C
3.4.6 A.4	Describes the condition that defines inoperable or not in operation and splits the CTS Action into two separate Actions.	LCO 3.4.1.3 Action a	LCO 3.4.6 Action A, B
3.4.6 A.5	Changes the word "dilution" to "reduction" in the footnote discussion regarding prohibiting dilution of RCS boron concentration during the time when all RCPs and SDC pumps are de-energized.	LCO 3.4.1.3 Footnote *	LCO 3.4.6 NOTE 1
3.4.7 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.4.1.4.1	LCO 3.4.7
3.4.7 A.2	Changes the word "dilution" to "reduction" in the footnote discussion regarding prohibiting dilution of RCS boron concentration during the time when all RCPs and SDC pumps are de-energized.	LCO 3.4.1.4.1 Footnote *	LCO 3.4.7 NOTE 1
3.4.7 A.3	Adds the words "required SDC train inoperable" to "with no shutdown cooling loop in operation...." to clarify the intent of the Action.	LCO 3.4.1.4.1 Action b	LCO 3.4.7 Action B
3.4.7 A.4	Describes the condition that defines inoperable or not in operation and splits the CTS Action into two separate Actions.	LCO 3.4.1.4.1 Footnote *	LCO 3.4.7 NOTE 1



Discussion of Change	Description	CTS Section	ITS Section
3.4.8 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.4.1.4.2	LCO 3.4.8
3.4.8 A.2	Changes the word "dilution" to "reduction" in the footnote discussion regarding prohibiting dilution of RCS boron concentration during the time when all RCPs and SDC pumps are de-energized.	LCO 3.4.1.4.2 Footnote *	LCO 3.4.8 NOTE 1.b
3.4.8 A.3	Not Used	N/A	N/A
3.4.9 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.4.3.1	LCO 3.4.9
3.4.9 A.2	Adds a NOTE regarding the applicability of the pressurizer steady state water level specification to clarify the transient conditions in which the limit doesn't apply.	LCO 3.4.3.1	LCO 3.4.9 NOTE
3.4.10 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.4.2.2	LCO 3.4.10
3.4.10 A.2	Changes the manner of reference to Inservice Testing requirements from LCO 4.0.5 to the Inservice Testing Program for the pressurizer safety valves.	SR 4.4.2.2	SR 3.4.10.1
3.4.11 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.4.2.2	LCO 3.4.11
3.4.11 A.2	Changes the manner of reference to Inservice Testing requirements from LCO 4.0.5 to the Inservice Testing Program for the pressurizer safety valves.	SR 4.4.2.1	SR 3.4.11.1



Discussion of Change	Description	CTS Section	ITS Section
3.4.12 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.4.10	LCO 3.4.12
3.4.12 A.2	Deletes the phrase "from either location" to reflect the removal of the reactor head vents from Technical Specifications which leaves only pressurizer vents in ITS.	LCO 3.4.10 Action a, b	LCO 3.4.12
3.4.12 A.3	Deletes the statement that the pressurizer vent valves have to be closed since the requirements for the valves to be closed are contained in other parts of the specifications.	LCO 3.4.10	3.4.12
3.4.13 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.4.8.3	LCO 3.4.13
3.4.13 A.2	Moves clarifying information regarding the circumstances when SDC suction line relief valves must be placed in service into a NOTE.	LCO 3.4.8.3	LCO 3.4.13 NOTE
3.4.13 A.3	Deletes the specific statement of LCO 3.0.4 exclusion for MODE 5 and 6 since the ITS definition of LCO 3.0.4 excludes these modes.	LCO 3.4.8.3 Action f	LCO 3.4.13
3.4.13 A.4	Rewords and moves the prohibition on starting an RCP if the SG secondary water temperature is more than 100°F greater than any cold leg temperature into a NOTE.	LCO 3.4.8.3 Action a, b, c	LCO 3.4.13 NOTE
3.4.14 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.4.4 LCO 3.4.5.2	LCO 3.4.14
3.4.14 A.2	Adds an Action that requires immediate entry into LCO 3.0.3 if one or more Steam Generators is inoperable. This is a reformat of CTS requirements and not a change in requirements.	LCO 3.4.4 Action	LCO 3.4.14 Action C



Discussion of Change	Description	CTS Section	ITS Section
3.4.14 A.3	Eliminates a redundant requirement to monitor the containment atmospheric gaseous and particulate radioactivity monitor at least once per 12 hours.	SR 4.4.5.1.a SR 4.4.5.2.1	SR 3.4.16.1
3.4.14 A.4	Eliminates a footnote reference that excludes the provisions of Specification of 4.0.4 and clarifies the related issue requirements for performance such that an explicit exception is not necessary.	SR 4.4.5.2.1.c	SR 3.4.14.1
3.4.15 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.4.5.2 LCO 3.7.11	LCO 3.4.15
3.4.15 A.2	Provides a NOTE which clarifies the intent of the Action and gives explicit instructions for proper application of the Actions to achieve TS compliance.	LCO 3.4.5.2 Action c	LCO 3.4.15 NOTE 1
3.4.16 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.3.3.1 LCO 3.4.5.1	LCO 3.4.16
3.4.16 A.2	Removes cross-reference note to another specification because cross-reference notes are not used in ITS or NUREG-1432.	LCO 3.3.3.1 Table 3.3-6 Action 23	LCO 3.4.16
3.4.15 A.3	Moves the Action requirements for the Containment Sump Monitoring System to be OPERABLE when the containment atmosphere radioactivity monitor (gaseous and particulate) is inoperable (and vice-versa) to an LCO and Actions.	LCO 3.4.5.1 Action a, b	LCO 3.4.16 LCO 3.4.16 Action C, D
3.4.17 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.4.7	LCO 3.4.17
3.4.17 A.2	Relocates the primary coolant specific activity requirements from the LCO to Surveillance Requirements without changing the requirements.	LCO 3.4.7 (a and b)	SR 3.4.17.1 SR 3.4.17.2





Discussion of Change	Description	CTS Section	ITS Section
3.5.1 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.5.1	LCO 3.5.1
3.5.1 A.2	Removes cross reference note to a Special Test Exception because cross reference notes are not used in ITS or NUREG-1432.	LCO 3.5.1	LCO 3.5.1
3.5.1 A.3	Not Used	N/A	N/A
3.5.1 A.4	Adds an action to require entry into LCO 3.0.3 if two or more SITs are inoperable. This is a clarification to ensure the operators understand the need to enter LCO 3.0.3 in circumstances with multiple SITs inoperable for different Action requirements.	LCO 3.5.1	LCO 3.5.1 Action D
3.5.1 A.5	Removes the requirement regarding the verification that power is removed from the SIT isolation valve operator when pressurizer pressure is above 430 psia. This is administrative since this ITS LCO isn't applicable below 1837 psia.	SR 4.5.1.c	SR 3.5.1.5
3.5.1 A.6	Changes the Action requirement end-states from "HOT SHUTDOWN" to "< 1837 psia" which is an administrative change that reflects the split of this CTS LCO into ITS LCO 3.5.1 and 3.5.2. This Action end-state takes the plant to a condition where LCO 3.5.1 no longer applies.	LCO 3.5.1 Action a, b, c	LCO 3.5.1 Action C
3.5.1 A.7	Reflects the split of this CTS LCO into two ITS LCOs, (3.5.1 and 3.5.2) by changing the MODE of applicability to match the administrative split of requirements.	LCO 3.5.1	LCO 3.5.1
3.5.1 A.8	Not Used	N/A	N/A
3.5.2 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.5.1	LCO 3.5.2



Discussion of Change	Description	CTS Section	ITS Section
3.5.2 A.2	Removes cross reference note to a Special Test Exception because cross reference notes are not used in ITS or NUREG-1432.	LC0 3.5.1	LC0 3.5.2
3.5.2 A.3	Not Used	N/A	N/A
3.5.2 A.4	Adds an action to require entry into LC0 3.0.3 if two or more SITs are inoperable. This is a clarification to ensure the operators understand the need to enter LC0 3.0.3 in circumstances with multiple SITs inoperable for different Action requirements.	LC0 3.5.1	LC0 3.5.2 Action D
3.5.2 A.5	Reflects the split of this CTS LC0 into two ITS LC0s, (3.5.1 and 3.5.2) by changing the MODE of applicability to match the administrative split of requirements.	LC0 3.5.1	LC0 3.5.2
3.5.2 A.6	Not Used	N/A	N/A
3.5.3 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LC0 3.5.2 LC0 3.7.11	LC0 3.5.3
3.5.3 A.2	Relocates the direction to perform specific ECCS SRs "during shutdown" from the Surveillance Requirement to a clarification in the Frequency column.	SR 4.5.2.e	SR 3.5.3.4 SR 3.5.3.5 SR 3.5.3.6
3.5.3 A.3	Changes the wording regarding pumps that must start on upon receipt of an SI actuation signal from "low pressure safety injection pumps" and "high pressure safety injection pumps" to ECCS pumps, which encompasses both LPSI and HPSI pumps.	SR 4.5.2.3.2	SR 3.5.3.5
3.5.3 A.4	Removes cross reference note to a different Specification that contains IST requirements because cross reference notes are not used in ITS or NUREG-1432. The reference is replaced with "In accordance with the Inservice Testing Program."	SR 4.5.2.f	SR 3.5.3.3
3.5.3 A.5	Not Used	N/A	N/A



Discussion of Change	Description	CTS Section	ITS Section
3.5.4 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LC0 3.5.3	LC0 3.5.4
3.5.5 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LC0 3.5.4	LC0 3.5.5
3.5.5 A.2	Deletes the portion of the figure related to Spent Fuel Pool Volume requirements since this portion of the Specification has been relocated and is therefore no longer applicable.	LC0 3.5.4 Figure 3.1-1	LC0 3.5.5
3.5.6 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LC0 3.5.2	LC0 3.5.6
3.5.6 A.2	Incorporates the TS change request dated June 28, 1996 which changes the minimum cubic feet of TSP from 464 to 524. This change is characterized as administrative because the change reflects the approved TS Amendments 110, 102 and 82 to Units 1, 2, and 3, respectively.	SR 4.5.2.d.2	SR 3.5.6.1
3.6.1 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LC0 3.6.1.1 LC0 3.6.1.2 LC0 3.6.1.6	LC0 3.6.1
3.6.1 A.2	Combines the use of terms describing aspects of Containment operability (integrity and leakage rates) into the single concept that "Containment shall be OPERABLE." The intent is not changed.	LC0 3.6.1.1 LC0 3.6.1.2 LC0 3.6.1.6	LC0 3.6.1
3.6.1 A.3	Combines the LCO singular focus on "Containment leakage rates) into the single concept that "Containment shall be OPERABLE."	LC0 3.6.1.2	LC0 3.6.1
3.6.1 A.4	Excludes the Containment air locks from the Surveillance for visual examination and leakage rate testing since it is separately addressed in ITS 3.6.2.	SR 4.6.1.2	SR 3.6.1.1



Discussion of Change	Description	CTS Section	ITS Section
3.6.1 A.5	Deletes specification of requirements related to containment structural integrity since they are now a part of the Containment Tendon Surveillance Program addressed in ITS section 5.5.6.	SR 4.6.1.6.1	SR 3.6.1.2 ITS 5.5.6
3.6.1 A.6	Adds the statement requiring performance of periodic visual examinations of the containment since that examination is required by 10 CFR 50, Appendix J and conformance is controlled by the Containment Leakage Rate Testing Program described in ITS section 5.5.6.	SR 4.6.1.2	SR 3.6.1.1 ITS 5.5.6
3.6.1 A.7	Eliminates a statement requiring conformance to a related Specification since the ITS format does not typically make such cross-references and the referenced Specification's requirements separately require conformance and therefore stand on their own.	SR 4.6.1.1.b	LCO 3.6.1.1
3.6.1 A.8	Eliminates an exception to LCO 4.0.2 which allows surveillance intervals to be extended a maximum of 25%. This interval is specified by regulation and the extension does not apply in ITS as stated in the SR 3.0.2 bases and therefore this change is administrative only.	SR 4.6.1.2	SR 3.6.1.1
3.6.2 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.6.1.3	LCO 3.6.2
3.6.2 A.2	Eliminates the specific option to restore the inoperable air lock door to OPERABILITY to exit the LCO since it's a basic concept addressed in LCO 3.0.2.	LCO 3.6.1.3	LCO 3.0.2
3.6.2 A.3	Eliminates an unnecessary exception to LCO 3.0.4 since the actions of this LCO permit operation with an inoperable air lock door for an unlimited period of time.	LCO 3.6.1.3 Action a.3	LCO 3.0.4
3.6.2 A.4	Eliminates reference to performing Surveillances in accordance with the Containment Leakage Rate Testing Program "at periodic intervals" since the program specifies the intervals.	SR 4.6.1.3.a	SR 3.6.2.1





Discussion of Change	Description	CTS Section	ITS Section
3.6.2 A.5	Adds a clarifying NOTE which permits separate Condition entry for each air lock. This was implied in CTS by the wording of the LCO that stated "Each containment air lock shall be OPERABLE."	LCO 3.6.1.3	LCO 3.6.2 NOTE 2
3.6.2 A.6	Adds clarifying NOTES and Actions to remind the licensee that other Specifications may be affected if the leakage rate of the air lock(s) violate Containment Integrity.	LCO 3.6.1.3	LCO 3.6.2 NOTE 3  LCO 3.6.2 Action C.1  SR 3.6.2.1 NOTE
3.6.2 A.7	Adds a clarifying NOTE regarding the applicability of Actions A.1, A.2 and A.3 if Condition C is entered. This NOTE is necessary due to the ITS practice of multiple Condition entry and makes the ITS LCO consistent with the CTS source LCO.	LCO 3.6.1.3 Action b	LCO 3.6.2 Action A NOTE 1
3.6.2 A.8	Adds a clarifying NOTE regarding the applicability of Actions B.1, B.2 and B.3 if Condition C is entered.	LCO 3.6.1.3 Action b	LCO 3.6.2 Action B NOTE 1
3.6.2 A.9	Adds a clarifying NOTE which states "An inoperable air lock door does not invalidate the previous successful performance of the overall air lock leakage test."	SR 4.6.1.3	SR 3.6.1.2.1 NOTE 1
3.6.2 A.10	Eliminates an exception to LCO 4.0.2 which allows surveillance intervals to be extended a maximum of 25%. This interval is specified by regulation and the extension does not apply in ITS as stated in the SR 3.0.2 bases and therefore this change is administrative only.	SR 4.6.1.3	SR 3.0.2
3.6.3 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.6.1.1 LCO 3.6.1.7 LCO 3.6.3	LCO 3.6.3



Discussion of Change	Description	CTS Section	ITS Section
3.6.3 A.2	Removes the requirement from SRs for verification of position for valves closed to comply with Actions since these verifications are now required in specific Actions (LCO 3.6.3 Action A.2, C.2 and D.2).	SR 4.6.1.1.a	3.6.3 ACTIONS
3.6.3 A.3	Adds a NOTE which states "Separate Condition entry is allowed for each penetration flow path" which clarifies the intent of the CTS source LCO.	LCO 3.6.1.7	LCO 3.6.3 NOTE 2
3.6.3 A.4	Rewords the CTS NOTE to provide clarification that Actions are to be complied with for systems made inoperable by inoperable by containment isolation valves.	LCO 3.6.3 Action 1.b, 1.c Note **	LCO 3.6.3 NOTE 3
3.6.3 A.5	Adds a clarifying NOTE to remind the licensee that another Specification may be affected if the leakage rate of a penetration flow path violates Containment Integrity.	LCO 3.6.1.7 LCO 3.6.3	LCO 3.6.3 NOTE 4
3.6.3 A.6	Adds clarifying NOTES specifying which Actions are applicable to each type of penetration.	LCO 3.6.1.7 LCO 3.6.3 LCO 3.6.1.1	LCO 3.6.3 Action A, B, C NOTE
3.6.3 A.7	Not Used	N/A	N/A
3.6.3 A.8	Rewords the Action Condition Statement to clarify that they apply to one or more penetration flow paths with inoperable CIVs.	LCO 3.6.1.7 Action a, b, c	LCO 3.6.3 Action A, D
3.6.3 A.9	Eliminates specific reference to restoring operability as a method of exiting the LCO Actions since this is already provided generically in ITS LCO 3.0.2.	LCO 3.6.1.7 Action a, b, c  LCO 3.6.3 Action a	LCO 3.0.2



Discussion of Change	Description	CTS Section	ITS Section
3.6.3 A.10	Eliminates the requirement to perform a 31 day interval position verification Surveillance on a purge valve with leakage exceeding limits in a penetration flow path while in an Action Statement for that condition. That Action separately isolates the valve and requires a 31 day interval position verification.	SR 4.6.1.7.1	SR 3.6.3.1
3.6.3 A.11	Eliminates a cross-reference to a related SR since cross-references are not used in ITS or NUREG-1432 and the LCO for the related SR imposes its own Applicability.	SR 4.6.3.6	LCO 3.6.3
3.6.3 A.12	Rewords a NOTE regarding unisolating penetration flow paths (except for 42 inch purge penetrations) intermittently under administrative control.	LCO 3.6.3 Note *	LCO 3.6.3 NOTE
3.6.3 A.13	Adds clarifying information regarding devices acceptable for isolating the penetration flow path.	LCO 3.6.1.7 Action a, b, c	LCO 3.6.3 Action A, D
3.6.3 A.14	Adds a clarifying statement directing user to the appropriate Action for purge valve leakage not within limits.	LCO 3.6.1.7 Action a, b  LCO 3.6.3 Action 1	LCO 3.6.3 Action A
3.6.3 A.15	Changes the reference for testing the Containment Spray System automatic valves from CTS Specification 4.0.5 (ASME Section XI pump and valve testing) to the Inservice Testing Program which is described in Section 5.5.8 of ITS and contains the ASME Section XI pump and valve testing requirements.	SR 4.6.3.3	SR 3.6.3.5
3.6.3 A.16	Expands the devices allowed to isolate a penetration by including the use of a check valve with flow through the valve secured which is considered an "automatic valve." "Deactivated automatic valves" were permitted in the CTS source.	LCO 3.6.3 Action 1.b	LCO 3.6.3 Action A
3.6.3 A.17	Eliminates the exemption to the provisions of Specification 3.0.4 since the Actions permit operation for an unlimited time and an exemption is not required.	LCO 3.6.3 Action 1.e	LCO 3.0.4



Discussion of Change	Description	CTS Section	ITS Section
3.6.4 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LC0 3.6.1.4	LC0 3.6.4
3.6.5 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LC0 3.6.1.5	LC0 3.6.5
3.6.6 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LC0 3.6.2.1	LC0 3.6.6
3.6.6 A.2	Eliminates specific reference to restoring operability as a method of exiting the LC0 Actions since this is already provided generically in ITS LC0 3.0.2.	LC0 3.6.2.1 Action	LC0 3.0.2
3.6.6 A.3	Adds a new Action that requires immediate entry into LC0 3.0.3 if two containment spray pumps are inoperable. Though not specifically addressed as an Action in CTS, the requirements are the same and therefore this is only an administrative change.	LC0 3.0.3	LC0 3.6.6 Action C
3.6.6 A.4	Changes the reference for containment spray pump testing from CTS Specification 4.0.5 (ASME Section XI pump and valve testing) to the Inservice Testing Program which is described in Section 5.5.8 of ITS and contains the ASME Section XI pump and valve testing requirements.	SR 4.6.2.1.b	SR 3.6.6.3
3.6.6 A.5	Moves the information regarding when testing system actuation with test signals from the SR to the Frequency column of ITS but makes no change in intent.	SR 4.6.2.1.d	SR 3.6.6.4
3.6.6 A.6	Rewords the SR for verification of proper valve response upon receipt of a recirculation actuation test signal but does not change the intent of the SR.	SR 4.6.2.1.d.2	SR 3.6.6.4





Discussion of Change	Description	CTS Section	ITS Section
3.6.6 A.7	Rewords the Action and Completion Time requirements for one containment spray system inoperable and eliminates the restoration of Operability as an explicit action since it is always an available option. The total time allowed and the intent of the Action remain the same.	LCO 3.6.2.1 Action	LCO 3.6.6 Action A, B
3.6.7 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.6.4.2	LCO 3.6.7
3.6.7 A.2	Not Used	N/A	N/A
3.6.7 A.3	Not Used	N/A	N/A
3.7.1 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.7.1.1	LCO 3.7.1
3.7.1 A.2	Eliminates the portion of the Action opening statement that simply describes MODE 1 and 2 requirements and adds no useful information.	LCO 3.7.1.1 Action a	LCO 3.7.1 Action A
3.7.1 A.3	Eliminates an unnecessary statement "...operation in MODES 1 and 2 may proceed provided that..." since this is implied by the nature of the Action statement.	LCO 3.7.1.1 Action a	LCO 3.7.1 Action A
3.7.1 A.4	Eliminates an unnecessary statement "...either all the inoperable valves are restored to OPERABLE status..." in the Action since this is a method of exiting the Action statement is addressed in LCO 3.0.2 and does not need to be included here.	LCO 3.7.1.1 Action a	LCO 3.7.1 Action A
3.7.1 A.5	Adds a clarifying NOTE which states that "Separate Condition entry is allowed for each MSSV" which was not needed in the CTS source by the nature of its format.	LCO 3.7.1.1 Actions	LCO 3.7.1 Actions
3.7.1 A.6	Makes reference to Table 3.7.1-1 and so eliminates the need to restate the provisions of normal operations in the Actions.	LCO 3.7.1.1 Action b	LCO 3.7.1 Action B



Discussion of Change	Description	CTS Section	ITS Section
3.7.1 A.7	Eliminates a Specification 3.0.4 exclusion by the addition of a NOTE which states "Not required to be performed prior to entry into MODE 3." The allowance to enter MODE 3 and test MSSVs at hot conditions is retained and the intent is unchanged.	LCO 3.7.1.1 Action c	SR 3.7.1.1
3.7.1 A.8	Eliminates an asterisked note regarding an allowance for Unit 1, Cycle 5 operation at 100% power with one inoperable MSSV.	LCO 3.7.1.1 Table 3.7-2 Note *	LCO 3.7.1 ,
3.7.2 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.7.1.5	LCO 3.7.2
3.7.2 A.2	Changes the reference for stroke time testing of the MSIVs from CTS Specification 4.0.5 (ASME Section XI pump and valve testing) to the Inservice Testing Program which is described in Section 5.5.8 of ITS and contains the ASME Section XI pump and valve testing requirements.	SR 4.7.1.5.1	SR 3.7.2.1
3.7.2 A.3	Eliminates an exclusion to Specification 4.0.4 and adds a NOTE stating that MODE 3 entry is permitted prior to performing the MSIV closure time Surveillance. This permits establishment of conditions under which the acceptance criteria was generated and does not change the intent of the CTS source requirements.	SR 4.7.1.5.2	SR 3.7.2.1
3.7.2 A.4	Eliminates an exclusion to Specification 3.0.4 which is unneeded since the Action permits continued operation for an unlimited period of time and the intent is therefore equivalent.	LCO 3.7.1.5 MODE 2, 3, 4 Action b	LCO 3.7.2 Action C
3.7.3 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.6.3	LCO 3.7.3
3.7.3 A.2	LCO restated to be equipment specific since the MFIVs are now located in a separate and unique LCO instead of being a subpart of the Containment Isolation Valve LCO.	LCO 3.6.3	LCO 3.7.3



Discussion of Change	Description	CTS Section	ITS Section
3.7.3 A.3	Adds a clarifying NOTE which states that "Separate Condition entry is allowed for each penetration flow path" which was not needed in the CTS source by the nature of its format.	LCO 3.6.3 Actions	LCO 3.7.3 NOTE
3.7.3 A.4	Retains the requirement to "Isolate the affected penetration within 4 hours by use of at least one closed manual valve or blind flange" since there are no manual valves or blind flanges that can be used for this purpose.	LCO 3.6.3 Action 1.c	LCO 3.7.3
3.7.3 A.5	Eliminates an exclusion to Specification 3.0.4 which is unneeded since the Action permits continued operation for an unlimited period of time and the intent is therefore equivalent.	LCO 3.6.3 Action 1.e	LCO 3.7.3
3.7.4 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.7.1.6	LCO 3.7.4
3.7.4 A.2	Removes cross reference note to a Special Test Exception because cross reference notes are not used in ITS or NUREG-1432.	LCO 3.7.1.6	LCO 3.7.4
3.7.4 A.3	Rewords the LCO to clarify that only one ADV per steam generator is required to be OPERABLE.	LCO 3.7.1.6	LCO 3.7.4
3.7.4 A.4	Rewords the Action Condition from "With less than one atmospheric dump valve..." to "One required ADV line inoperable" but does not change the intent.	LCO 3.7.1.6 Action	LCO 3.7.4 Action A
3.7.5 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.7.1.2	LCO 3.7.5
3.7.5 A.2	Changes the LCO and Action statements to refer to "trains" instead of "flowpaths" and "pumps" but does not change the scope or intent.	LCO 3.7.1.2 LCO 3.7.1.2 Action a, b, c	LCO 3.7.5



Discussion of Change	Description	CTS Section	ITS Section
3.7.5 A.3	Adds clarification that the SR applies to valves the water and both steam flow paths for the AFW pump.	SR 4.7.1.2.a.1	SR 3.7.5.1
3.7.5 A.4	Not Used	N/A	N/A
3.7.5 A.5	Moves the statement directing that testing system actuation with test signals from the Surveillance column of CTS to the Frequency column of ITS but does not change the intent.	SR 4.7.1.2.c	SR 3.7.5.3 SR 3.7.5.4
3.7.6 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.7.1.3	LCO 3.7.6
3.7.6 A.2	Rewords the Action and Completion Time requirements for the condensate storage tank inoperable to eliminate the restoration of Operability as an explicit action since it is always an available option by LCO 3.0.2. The total time allowed and the intent of the Action remain the same.	LCO 3.7.1.3 Action a	LCO 3.7.6 Action A.1
3.7.7 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.7.3	LCO 3.7.7
3.7.7 A.2	Provides clarification that the requirement to perform the 18 month EW pump and valve tests does not include the need to perform the testing "during shutdown".	SR 4.7.3.b SR 4.7.3.c	SR 3.7.7.2 SR 3.7.7.3
3.7.7 A.3	Provide clarification that the permissible signals to demonstrate satisfaction of the Surveillance Requirements include both actual and simulated actuation signals.	SR 4.7.3.b SR 4.7.3.c	SR 3.7.7.2 SR 3.7.7.3
3.7.7 A.4	Adds a NOTE to Required Action A.1 directing users to the shutdown cooling TS for Actions to take when that system is made inoperable by an inoperable EW System.	LCO 3.7.3	LCO 3.7.7 Action A.1
3.7.7 A.5	Adds a NOTE to SR 3.7.7.1 to clarify that isolation of EW System Flow to individual components does not render EW inoperable.	SR 4.7.7.1	SR 3.7.7.1





Discussion of Change	Description	CTS Section	ITS Section
3.7.8 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.7.4	LCO 3.7.8
3.7.8 A.2	Adds a NOTE to SR 3.7.8.1 to clarify that "Isolation of ESPS flow to individual components does not render ESPS inoperable.	SR 4.7.4.1	SR 3.7.8.1
3.7.8 A.3	Adds a NOTE to LCO 3.7.8 Required Action A.1 directing users to the emergency diesel generator TS and shutdown cooling TS for Actions to take when those systems are made inoperable by an inoperable ESPS.	LCO 3.7.4	LCO 3.7.8 Action A.1
3.7.9 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.7.5	LCO 3.7.9
3.7.9 A.2	Transfers the details of ultimate heat sink OPERABILITY from the LCO to the associated Surveillance Requirements.	LCO 3.7.5	SR 3.7.9.1 SR 3.7.9.2
3.7.9 A.3	Clarifies that the use of the word "average" regarding the verification of the spray pond water temperature is not necessary since there is only a single location for temperature determination and it provides a representative indication of the bulk temperature.	LCO 3.7.5.b	SR 3.7.9.2
3.7.10 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.7.6	LCO 3.7.10
3.7.10 A.2	Provides clarification that the Essential Chilled Water System valve position verification applies to all valves in the flow path not just valves servicing safety-related equipment.	SR 4.7.6.1	SR 3.7.10.1
3.7.11 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.7.7	LCO 3.7.11



Discussion of Change	Description	CTS Section	ITS Section
3.7.11 A.2	Adds a new Action which addresses two CREFS trains inoperable in MODES 1, 2, 3 and 4 and requires immediate entry into LCO 3.0.3. This is equivalent to the CTS approach for this situation and so does not represent a change in intent.	LCO 3.7.7	LCO 3.7.11 Action F
3.7.11 A.3	Removes statement of CREFS filter testing and instead makes reference to the Ventilation Filter Test Program which is describe in section 5.5.11 of the ITS.	SR 4.7.7.b	SR 3.7.11.2
3.7.11 A.4	Removes the specification how the CREFS System must be started for the monthly test of operation.	SR 4.7.7.a	SR 3.7.11.1
3.7.12 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.7.7	LCO 3.7.12
3.7.12 A.2	Adds a new Action which addresses two CREATCS trains inoperable in MODES 1, 2, 3 and 4 and requires immediate entry into LCO 3.0.3. This is equivalent to the CTS approach for this situation and so does not represent a change in intent.	LCO 3.7.7	LCO 3.7.12 Action F
3.7.13 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.7.8	LCO 3.7.13
3.7.13 A.2	Removes details of testing the ventilation filters and instead makes reference to the Ventilation Filter Test Program which is described in ITS section 5.5.11.	SR 4.7.8.b SR 4.7.8.c SR 4.7.8.d SR 4.7.8.e SR 4.7.8.f	SR 3.7.13.2
3.7.13 A.3	Deletes a cross reference to another LCO since cross references are not used in the ITS or NUREG-1432. This is an administrative change only.	LCO 3.7.8 Note *	LCO 3.7.13
3.7.14 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.9.11	LCO 3.7.14

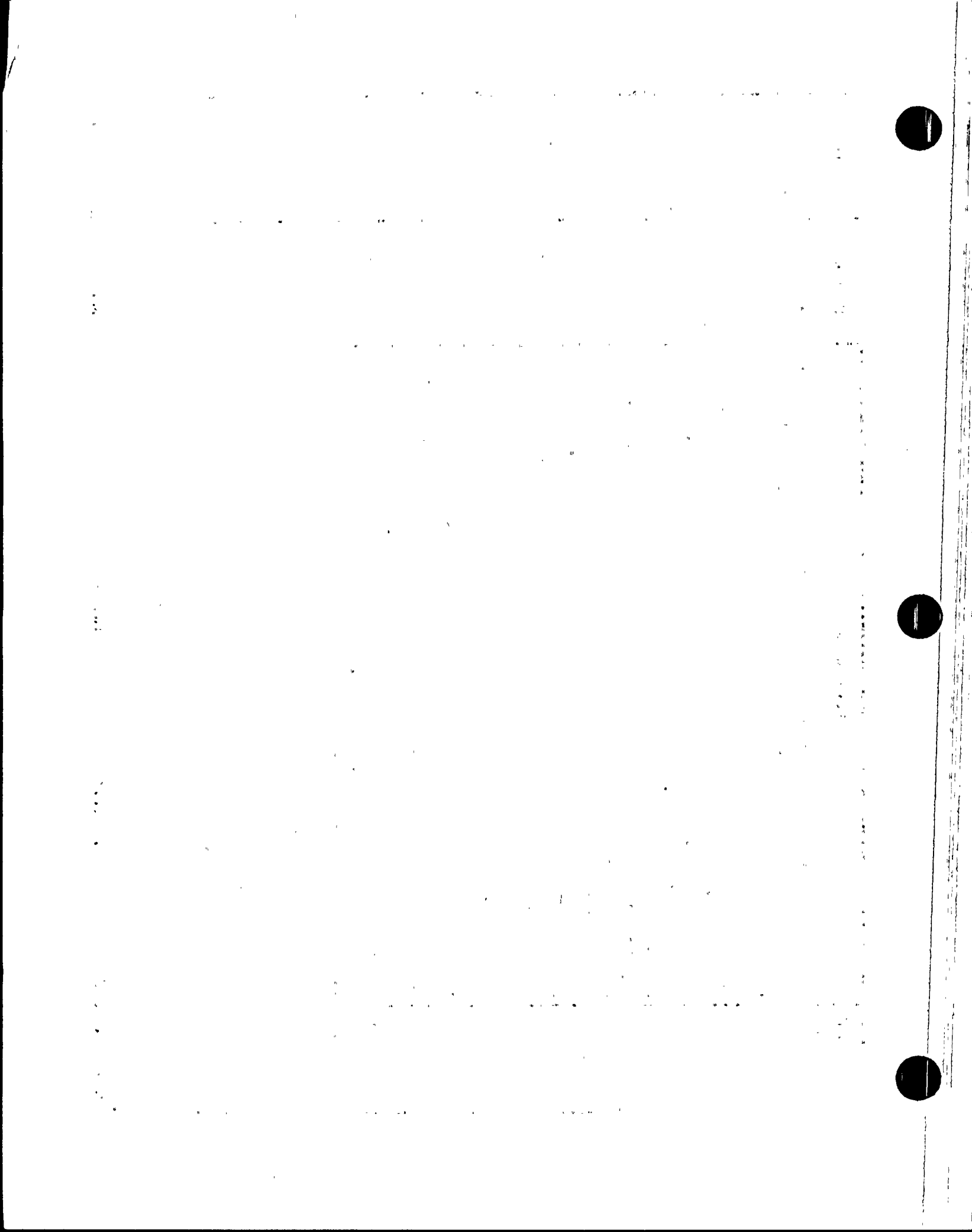


Discussion of Change	Description	CTS Section	ITS Section
3.7.14 A.2	Deletes a restatement of Applicability in the SR that mirrors the LCO applicability.	SR 4.9.11	SR 3.7.14.1
3.7.15 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.9.13	LCO 3.7.15
3.7.15 A.2	Deletes the specification as to how boron concentration of the spent fuel pool is to be determined and clarifies that not only is it to be determined, it must also be within the limits of the specification.	SR 4.9.13	SR 3.7.15.1
3.7.16 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.7.1.4	LCO 3.7.16
3.7.17 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	Section 5.3.1.2	LCO 3.7.17
3.8.1 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.8.1	LCO 3.8.1
3.8.1 A.2	Not Used	N/A	N/A
3.8.1 A.3	Eliminates the Action footnotes regarding entry into applicable conditions and requirements because the format change of ITS makes them redundant	LCO 3.8.1.1 Action c, d, e	LCO 3.8.1 Action C, D, E
3.8.1 A.4	Replaces the term "fuel limited" with "modified" regarding DG starts involving idling and gradual acceleration to synchronous speed.	SR 4.8.1.1.2.a.2 Footnote 2	SR 3.8.1.2 NOTE 3



Discussion of Change	Description	CTS Section	ITS Section
3.8.1 A.5	Modifies the wording regarding the circuits between the offsite transmission network to the switchyard and the circuits between the switchyard and the diesel generators to improve clarity.	LCO 3.8.1.1.a LCO 3.8.1.1.b	LCO 3.8.1.a LCO 3.8.1.b
3.8.1 A.6	Adds a new Action requiring immediate entry into Specification 3.0.3 if three or more required AC sources are inoperable. This is consistent with the intent of CTS and therefore represents an administrative change only.	LCO 3.8.1.1	LCO 3.8.1 Action I
3.8.1 A.7	Adds a statement for two SRs that states "All DG starts may be preceded by an engine prelube period." which is consistent with the BASES and therefore an administrative change only.	SR 4.8.1.1.2.d.8 SR 4.8.1.1.2.e	SR 3.8.1.15 SR 3.8.1.20
3.8.2 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.8.2	LCO 3.8.2
3.8.2 A.2	Clarifies the LCO wording regarding the circuits between the offsite transmission network, the onsite Class 1E distribution system and diesel generator. Also ensures all required loads are powered from offsite power and that a diverse power source is available if the offsite circuit is lost.	LCO 3.8.1.2.a LCO 3.8.1.2.b	LCO 3.8.2.a LCO 3.8.2.b
3.8.2 A.3	Transfers three SRs (4.8.1.1.2.d.4, 4.8.1.1.2.d.5 and 4.8.1.1.2.d.10) from the note pertaining to SRs that are not required and includes them in the list of ITS SRs that are not applicable because ESF functions are not require OPERABLE during shutdown.	SR 4.8.1.2 Note 2	LCO 3.8.2.1 NOTE
3.8.3 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.8.1.3.1	LCO 3.8.3





Discussion of Change	Description	CTS Section	ITS Section
3.8.3 A.2	Adds a new Action to declare the associated DG inoperable "immediately" if the Required Action and Associated Completion Times of the other Actions are not met or if another reason for inoperability is identified that is not addressed in the other LCO Actions.	LCO 3.8.1.3.1	LCO 3.8.3 Action F
3.8.4 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.8.2.1	LCO 3.8.4
3.8.4 A.2	Removes the use of the word "energized" in regard to the LCO requirement that the DC trains be energized but does not change the intent.	LCO 3.8.2.1	LCO 3.8.4
3.8.4 A.3	Removes the use of the word "Required" in connection with DC trains to eliminate confusion but does not change the intent.	LCO 3.8.2.1 Action a	LCO 3.8.3 Action A
3.8.4 A.4	Moves the direction to perform the Surveillance during times when the plant is not operating by deleting "during shutdown" and adding a Surveillance NOTE directing that the SR not be performed in MODES 1 through 4. The intent is not changed.	SR 4.8.2.1.d SR 4.8.2.1.e	SR 3.8.4.7 SR 3.8.4.8
3.8.4 A.5	Removes the use of the phrase "actual and simulated" regarding loads in verification of the battery capacity but does not change the intent.	SR 4.8.2.1.d	SR 3.8.4.7
3.8.4 A.6	Not Used	N/A	N/A
3.8.4 A.7	Changes the phrase "DC trains inoperable" to "DC electrical power subsystems (exclusive of the battery charge) inoperable" to more clearly define the meaning, eliminate confusion and make a clear distinction between the battery chargers and the rest of the DC power subsystem.	LCO 3.8.2.1	LCO 3.8.4 Action A
3.8.4 A.8	Not Used	N/A	N/A



Discussion of Change	Description	CTS Section	ITS Section
3.8.4 A.9	Adds the phrase "that would cause performance degradation" to the SR verification requirement that no visual indication of physical damage or abnormal deterioration exists.	SR 4.8.2.1.c.1	SR 3.8.4.3
3.8.4 A.10	Deletes specification of the method in which restoring charging capacity must be done.	LCO 3.8.2.1 Action (b)	LCO 3.8.4 Action C
3.8.4 A.11	CTS specifies criteria for both Exide and AT&T brand batteries. In PVNGS letter 102-04053 dated December 17, 1997, PVNGS requested to change the term Exide to reference the more descriptive term "low specific gravity cells." This is characterized as an administrative change since the battery performance criteria and cell parameters are not changed from those specified in the CTS.	LCO 3.8.2	LCO 3.8.4
3.8.5 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.8.2.2	LCO 3.8.5
3.8.5 A.2	Removes the use of the word "energized" in connection with the LCO describing the operability requirements for the DC train. The bases description details that the buses must be connected to batteries and operating chargers.	LCO 3.8.2.2	LCO 3.8.5
3.8.5 A.3	Deletes specification of the method in which restoring charging capacity must be done.	LCO 3.8.2.1 Action (b)	LCO 3.8.5 Action B
3.8.6 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.8.2.1	LCO 3.8.6
3.8.6 A.2	Removes references to Exide batteries which are no longer used at PVNGS.	LCO 3.8.2.1 Table 4.8-2	LCO 3.8.6 Table 3.8.6-1
3.8.6 A.3	Changes the reference to the number of connected cells to be tested from each battery back from 6 to 10% (which is 6 cells since the bank consists of 60 cells). This is an administrative change only.	SR 4.8.2.1.b.3	SR 3.8.6.3



Discussion of Change	Description	CTS Section	ITS Section
3.8.7 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.8.3.1	LCO 3.8.7
3.8.7 A.2	Reflects the effect of the administrative split of the source (CTS) Onsite Power Distribution Systems - Operation into two ITS Specifications, 3.8.7 Inverters - Operating and 3.8.9 Distributing Systems - Operating System. Adjustments were made in phrasing to accommodate this split but the intent is unchanged.	LCO 3.8.3.1 Action b.2	LCO 3.8.7 Action A.1, B.1, B.2
		LCO 3.8.3.1 Action b.1	LCO 3.8.9 Action B.1, D.1, D.2
3.8.8 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.8.3.2	LCO 3.8.8
3.8.8 A.2	Reflects the effect of the administrative split of the source (CTS) Onsite Power Distribution System - Shutdown into two ITS Specifications, 3.8.8 Inverters - Shutdown and 3.8.10 Distribution Systems - Shutdown. Adjustments were made in phrasing to accommodate this split but the intent is unchanged.	LCO 3.8.3.2.b (Inverters)	LCO 3.8.8
3.8.8 A.2	Reflects the effect of the administrative split of the source (CTS) Onsite Power Distribution System - Shutdown into two ITS Specifications, 3.8.8 Inverters - Shutdown and 3.8.10 Distribution Systems - Shutdown. Adjustments were made in phrasing to accommodate this split but the intent is unchanged.	LCO 3.8.3.2.a LCO 3.8.3.2.b LCO 3.8.3.2.c	LCO 3.8.10
3.8.9 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.8.3.1	LCO 3.8.9



Discussion of Change	Description	CTS Section	ITS Section
3.8.9 A.2	Explicitly states that the AC vital bus can be powered from the inverter or the Class 1E constant voltage regulator.	LCO 3.8.3.1 LCO 3.8.3.1 Action c	LCO 3.8.10 Action C
3.8.10 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.8.3.2	LCO 3.8.10
3.8.10 A.2	Explicitly states that the AC vital bus can be powered from the inverter or the Class 1E constant voltage regulator.	LCO 3.8.3.2.b	LCO 3.8.10 Bases  LCO 3.8.9 Bases
3.9.1 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.9.1	LCO 3.9.1
3.9.1 A.2	Deletes the redundant statement in the MODE 6 Applicability regarding reactor vessel head bolts not fully tight or the head removed which are unnecessary since the ITS Definition of MODE 6 already addresses this.	LCO 3.9.1	LCO 3.9.1
3.9.1 A.3	Not Used	N/A	N/A
3.9.1 A.4	Provides clarification that the specific requirement for the boron concentration of all filled portions of the Reactor Coolant System to be maintained "uniform" is part of the normal activities related to shutdown cooling and refueling.	LCO 3.9.1	LCO 3.9.1
3.9.1 A.5	Deletes the specific requirement that "chemical analysis" be used to determine boron concentration of the Reactor Coolant System and adds the requirement that the concentration be determined to be within limits. This was the intent of the original CTS specification so the change is administrative only.	SR 4.9.1.2	SR 3.9.1.1





Discussion of Change	Description	CTS Section	ITS Section
3.9.2 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.9.2	LCO 3.9.2
3.9.2 A.2	Adds a NOTE which excludes neutron detectors from the requirement for CHANNEL CALIBRATION.	SR 4.9.2.b SR 4.9.2.c	SR 3.9.2.2
3.9.3 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.9.4 LCO 3.9.9	LCO 3.9.3
3.9.3 A.2	Deletes a redundant specification of the status required for containment building penetrations.	SR 4.9.4	SR 3.9.3.1
3.9.3 A.3	Eliminates a cross reference which is no longer needed since the referenced material (SR 4.9.9) has been combined with the referencing SR into this ITS LCO.	SR 4.9.4.b	LCO 3.9.3
3.9.3 A.4	Clarifies the nomenclature for devices that may be used to close piping penetrations (other than purge valve penetrations) which provide direct access from the containment atmosphere to outside atmosphere.	LCO 3.9.4.c.1	LCO 3.9.3.c.1
3.9.3 A.5	Combines the requirements of two different CTS LCOs addressing containment purge penetration closure and the containment purge and exhaust isolation system to require that containment purge penetrations be capable of being closed by an OPERABLE Containment Purge and Exhaust Isolation System. The intent is not changed.	LCO 3.9.4.c.2 LCO 3.9.9	LCO 3.9.3.c.1
3.9.4 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.9.8.1	LCO 3.9.4



Discussion of Change	Description	CTS Section	ITS Section
3.9.4 A.2	Rewords the Action regarding the reload of irradiated fuel from "suspend all operations involving an increase in the reactor decay heat load..." to suspending loading of irradiated fuel assemblies in the core. Also changes the logical connector from "or" to "and" for clarification but does not alter the intent.	LCO 3.9.8.1 Action	LCO 3.9.4 Action A.1, A.2
3.9.5 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.9.8.2	LCO 3.9.5
3.9.5 A.2	Rewords the Action regarding the number of shutdown cooling loops OPERABLE from "With less than the required..." to "One SDC loop..." but since there are two and both are required, the meaning is equivalent and the intent is not changed.	LCO 3.9.8.2 Action a	LCO 3.9.5 Action A
3.9.5 A.3	Rewords the Action regarding shutdown cooling from "With no shutdown cooling loop in operation..." to "No SDC loop OPERABLE or in operation." The LCO requires two loops to be OPERABLE, one of which must be in operation. The Actions are equivalent and the rewording is for clarity only.	LCO 3.9.8.2 Action b	LCO 3.9.5 Action B
3.9.5 A.4	Eliminates the Required Action for suspending operations involving an increase in reactor decay heat load (irradiated fuel assembly movement). This is not needed since movement of those assemblies is not permitted when this LCO is Applicable. The Applicability of this LCO is MODE 6 with water level < 23 feet above the top of the flange. The Refueling Water Level - Fuel Assemblies LCO requires the level to be at or above 23 feet before fuel assembly movement is permitted.	LCO 3.9.8.2 Action b	LCO 3.9.5
3.9.5 A.5	Rewords the Action to clarify that the intention is to immediately suspend operations involving a reduction in reactor coolant boron concentration when no SDC loop is in operation.	LCO 3.9.8.2 Action b	LCO 3.9.5 Action B.1
3.9.6 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LCO 3.9.10.1	LCO 3.9.6



Discussion of Change	Description	CTS Section	ITS Section
3.9.6 A.2	Rewords the Action from "...suspend all operations involving movement of fuel assemblies..." to "Suspend movement of fuel assemblies within containment" for clarification but does not change the intent.	LC0 3.9.10 Action	LC0 3.9.6 Action A.1
3.9.7 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LC0 3.9.10.2	LC0 3.9.7
3.9.7 A.2	Rewords the LC0 to clarify that the water level restriction is applicable only if there is irradiated fuel in the reactor vessel but does not change the intent.	LC0 3.9.10.2	LC0 3.9.7
4.0 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	Section 5.0	Section 4.0
4.0 A.2	Moves the descriptive wording pertaining to spent fuel pool loading patterns.	Section 5.3.1.2 (a through c)	Section 4.3.1.1. (d through f)
5.0 A.1	Reformatted and renumbered in accordance with NUREG-1432, Rev. 1 to improve readability. Changes included editorial rewording and the insertion of additional descriptive information.	LC0 4.0.5 LC0 3.4.4 LC0 3.4.8.3 LC0 3.5.2 LC0 3.6.1.3 LC0 3.6.1.6 LC0 3.6.3 LC0 3.6.4.3 LC0 3.7.7 LC0 3.7.8 LC0 3.11.1 LC0 3.11.2 LC0 3.11.3 Section 6.0	Section 5.0



Discussion of Change	Description	CTS Section	ITS Section
5.0 A.2	Eliminates the requirement that the Vice President-Nuclear Production issue an annual directive stating that the Shift Supervisor is responsible for the Control Room function. This is an unnecessary reminder and the responsibilities of the Shift Supervisor are adequately documented elsewhere in the ITS and UFSAR.	Section 6.1.2	Section 5.1.2
5.0 A.3	Eliminates specification that organizational charts in the UFSAR be updated in accordance with 10 CFR 50.71(e) since that document includes the requirements for updating the UFSAR and restatement in Technical Specifications is redundant.	Section 6.2.1.a	Section 5.2.1.a
5.0 A.4	Rewords the description of responsibilities for the Department Leader Operations in regard to who directs the licensed activities of the licensed operators, clearly establishing that position as responsible for overall unit operation.	Section 6.3.1	Section 5.1.1
5.0 A.5	Rewords the statement regarding who is authorized to approve proposed modifications to nuclear-safety related structures, systems and components. CTS placed it with the Department Leader, Operations or Director, Site Operations. ITS places it with the Department Leader, Operations (who works for the Director, Site Operations) or his designee.	Section 6.5.2.3	Section 5.1.1
5.0 A.6	Eliminates referral to specific procedures that must written because they are elsewhere required by ITS 5.4.1.a through referral to Regulatory Guide 1.33.	Section 6.8.1 (b, c, h, k)	Section 5.4.1.a
5.0 A.7	Eliminates redundant sections requiring written procedures for ODCM implementation, secondary water chemistry program implementation and PASS implementation. Section 5.4.1.e of ITS requires written procedures for all programs addressed in ITS section 5.5 and these named items are addressed in that location.	Section 6.8.1 (i, l and m)	Section 5.4.1.e
5.0 A.8	Updates the section references of 10 CFR 20 to reflect the latest version (20.1302, 20.1601 and table 2).	Section 6.4.g (2) and (3)	Section 5.5.4 (b and c)
5.0 A.9	Rewords the reference to 10 CFR 50.4 regarding report submittal but does not change the intent.	Section 6.9.1	Section 5.6





Discussion of Change	Description	CTS Section	ITS Section
5.0 A.10	Changes the submittal dates for the Annual Radiological Environmental Operating Report and Occupational Radiation Exposure Report.	Sections 6.9.1.4 6.9.1.7	Sections 5.6.1 5.6.2
5.0 A.11	Eliminates an unnecessary referral to the submittal site for various reports. The ITS requires submittal in accordance with 10 CFR 50.4 which provides the NRC distribution requirements for report submittal.	Sections 6.9.1.6 6.9.1.10	Sections 5.6.4 5.6.5.b
5.0 A.12	Deletes an unnecessary requirement to submit special reports to "the NRC within the time period specified for each report." Each special report contains requirements for submittal.	Section 6.9.2	Section 5.6
5.0 A.13	Deletes the " $\pm 0.5$ " from the test pressure requirement for testing air locks at $\geq 14.5 \pm 0.5$ psig which is a redundant requirement included in the acceptance criteria.	Section 6.16.b.2	Section 5.5.16
5.0 A.14	Clarifies that ASME Boiler and PV Code Section XI testing includes "applicable supports."	LCO 4.0.5	Section 5.5.8
5.0 A.15	Deletes an unnecessary statement that says Inservice Inspection Program and Testing activities must be performed in addition to other Surveillance requirements.	LCO 4.0.5.d	Section 5.5.8
5.0 A.16	Adds a statement that SR 3.0.3 is applicable to ITS 5.5.8 for clarification since the ITS Applicability SRs are not normally applied to frequencies identified in Administrative Section of the ITS.	LCO 4.0.5	Section 5.5.8.c
5.0 A.17	Adds an ASME biennial (2 year) testing interval with a 731 day frequency. This frequency is already identified in the ASME code and this change is therefore administrative.	LCO 4.0.5.b	Section 5.5.8.a



Discussion of Change	Description	CTS Section	ITS Section
5.0 A.18	Rewords the requirement to submit a special report to the Commission to document challenges to the SCS suction line relief valves or pressurizer safety valves.	LC0 3.4.8.3 Action e	Section 5.6.4
5.0 A.19	Adds a statement that SR 3.0.2 and SR 3.0.3 are applicable to ITS 5.5.6 for clarification since the ITS Applicability SRs are not normally applied to frequencies identified in Administrative Section of the ITS.	SR 4.6.1.6.1	Section 5.5.6
5.0 A.20	Transfers the requirements for the Liquid Holdup Tanks, Explosive Gas Mixture and Gas Storage Tanks to ITS Section 5.5.12 to be housed within the ITS Explosive Gas and Storage Tank Radioactivity Monitoring Program.	LC0 3.11.1 LC0 3.11.2 LC0 3.11.3	Section 5.5.12
5.0 A.21	Expands on the definition of the word "temporary" regarding what precisely constitutes a temporary radwaste tank.	LC0 3.11.1	Section 5.5.12.c
5.0 A.22	Adds a statement that SR 3.0.2 and SR 3.0.3 is applicable to ITS 5.5.12 for clarification since the ITS Applicability SRs are not normally applied to frequencies identified in Administrative Section of the ITS.	LC0 3.11.1 Action b LC0 3.11.2 Action c LC0 3.11.3 Action b	Section 5.5.12
5.0 A.23	Adds a statement that SR 3.0.2 and SR 3.0.3 is applicable to ITS 5.5.11 for clarification since the ITS Applicability SRs are not normally applied to frequencies identified in Administrative Section of the ITS.	LC0 3.7.8	Section 5.5.11
5.0 A.24	Rewords the sample analysis requirement for diesel fuel storage tank samples from checking "viscosity and sediment" to "particulate concentration" which are equivalent. Both check for fuel oil degradation and the change is therefore administrative.	SR 4.8.1.3.1.2	Section 5.5.13.c



Discussion of Change	Description	CTS Section	ITS Section
5.0 A.25	Changes the calculated containment peak pressure for the design basis loss of coolant accident (P <sub>a</sub> ) from 49.5 psig to 52 psig. This change is characterized as administrative because the change reflects correct design pressure and was approved by TS Amendments 113, 106 and 85 to Units 1, 2, and 3, respectively.	LCO 3.6.1.3.b Section 6.16	Section 5.5.16
5.0 A.26	Adds clarification in the form of the statement "Shift crew composition shall meet the requirements stipulated herein and in 10 CFR 50.54(m)."	Section 6.2.2.a Table 6.2-1	Section 5.2.2.a
	Adds the clarifying statement "For the purpose of 10 CFR 50.54, a licensed senior reactor operator (SRO) and a licensed reactor operator (RO) are individuals who, in addition to meeting the requirements of 5.3.1, perform the functions described in 10 CFR 50.54(m)."	Section 6.3.1	Section 5.3.2
5.0 A.27	Revises content to incorporate changes to 10 CFR 20 and 10 CFR 50.36a intended to eliminate possible problems with implementation of the revised 10 CFR 20 requirements. Revised to ensure consistency with regulations.	Section 6.8.4.g (2), (7), (10)	Section 5.5.4.6



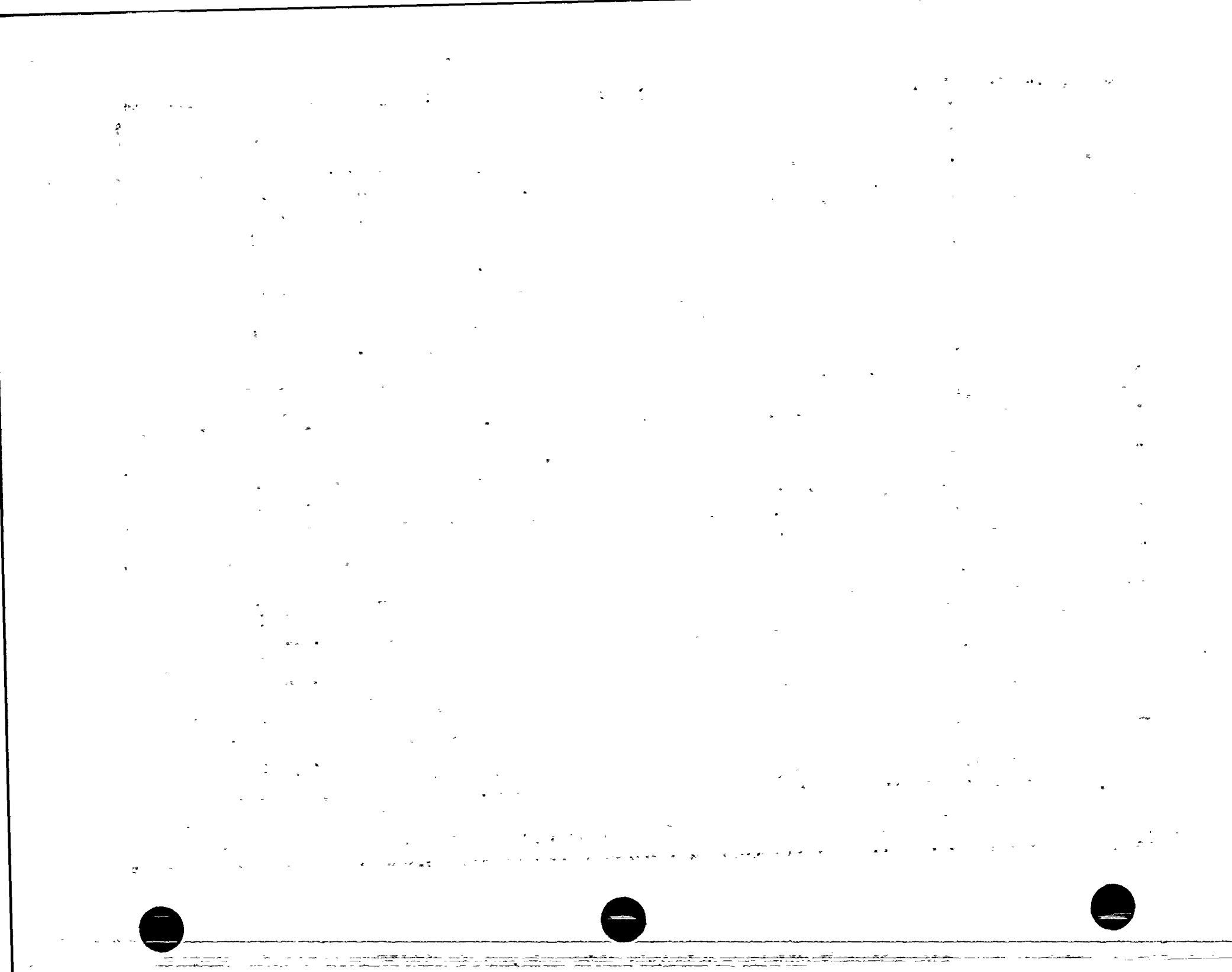
Table of PVNGS More Restrictive Changes (M)

Discussion of Change	Summary of Change	CTS Section	ITS Section
1.0 M.1	Not Used	N/A	N/A
1.0 M.2	Requires the required instrument display to be tested as part of the CHANNEL CALIBRATION and for in-place cross-calibration whenever an RTD is replaced.	1.4 Definition: CHANNEL CALIBRATION	1.1 Definition: CHANNEL CALIBRATION
		1.6.a Definition: CHANNEL FUNCTIONAL TEST	1.1 Definition: CHANNEL FUNCTIONAL TEST
1.0 M.3	Not Used	N/A	N/A
1.0 M.4	Increased requirement related to the Completion Times for situations when two subsystems become inoperable concurrently (without a note that allows the Conditions to be entered separately).	1.0 General	1.3 DESCRIPTION
2.0 None	N/A	N/A	N/A
3.0 M.1	Clarification that the interval extension of 1.25 times the specified interval does not apply to Frequencies specified as "once."	SR 4.0.2	SR 3.0.2
3.0 M.2	Requirement that missed Surveillance with an LCO Required Action Completion time less than 24 hours and Frequency less than 24 hours be performed within the more restrictive time of either 24 hours or the limit of the specified frequency.	SR 4.0.3	SR 3.0.3
3.1.1 None	N/A	N/A	N/A





Discussion of Change	Summary of Change	CTS Section	ITS Section
3.1.2 M.1	Added Action for the condition where reactor criticality could be achieved by shutdown group CEA movement.	LCO 3.1.1.2.c	LCO 3.1.2 Action B
3.1.3 None	N/A	N/A	N/A
3.1.4 None	N/A	N/A	N/A
3.1.5 M.1	Requirement that with two or more CEAs misaligned by > 9.9 inches the reactor trip breakers be opened.	LCO 3.1.3.1 Action b	LCO 3.1.5 Action E
3.1.6 None	N/A	N/A	N/A
3.1.7 M.1	Requirement that the PDIL alarm circuit be OPERABLE.	SR 4.1.3.6	LCO 3.1.7
	Action requirement for inoperable PDIL alarm circuit.	SR 4.1.3.6	LCO 3.1.7 Action D
	Requirement to verify PDIL alarm circuit OPERABILITY.	SR 4.1.3.6	SR 3.1.7.3
3.1.8 None	N/A	N/A	N/A
3.1.9 M.1	MODE applicability changed to MODES 2 and 3 during PHYSICS TESTS and no longer includes MODE 4.	LCO 3.10.1	LCO 3.1.9 APPLICABILITY
3.1.10 M.1	Required Action is added to reduce power to less than or equal to the test power plateau within 15 minutes if power exceeds the test thermal plateau.	LCO 3.10.2	LCO 3.1.10 Action A
3.1.10 M.2	Not Used	N/A	N/A
3.1.11 M.1	Elimination of CEA Position and Shutdown CEA Insertion Limit specification suspension since it is not necessary.	LCO 3.10.4	LCO 3.1.11



Discussion of Change	Summary of Change	CTS Section	ITS Section
3.1.11 M.1 (continued)	Elimination of CEA Position and Shutdown CEA Insertion Limit specification suspension since it is not necessary.	SR 4.10.4.2	LCO 3.1.11
3.1.11 M.2	Change in MODE applicability limits for LCO reducing circumstances when ITS 3.1.11 can be invoked.	LCO 3.10.4	LCO 3.1.11 APPLICABILITY
3.1.11 M.3	Addition of requirements of specification 3.2.4, DNBR.	LCO 3.10.4	LCO 3.1.11
		SR 4.10.4.2	SR 3.1.11.1
3.2.1 None	N/A	N/A	N/A
3.2.2 None	N/A	N/A	N/A
3.2.3 M.1	Required Action to reduce the Variable Overpower Trip Setpoint to $\leq 55\%$ Rated Thermal Power is added to the ITS.	LCO 3.2.3 Action b.2	LCO 3.2.3 Action B.2
3.2.4 None	N/A	N/A	N/A
3.2.5 None	N/A	N/A	N/A
3.3.1 M.1	Removes NOTE allowing the Local Power Density - High, Departure from Nucleate Boiling Ratio - Low and Logarithmic Power Level - High to be bypassed pursuant to Special Test Exception 3.10.3.	Table 3.3-1 Note (d)	N/A
	Removes NOTE allowing the setpoint for Reactor Coolant Flow - Low (Rate, Floor and Band) to be altered to disable the trip function during testing pursuant to Special Test Exception 3.10.3.	Table 2.2-1 Note (7)	N/A
3.3.1 M.2	Requires adjustment of the linear power level to agree with the calorimetric calculation if the absolute difference is equal to 2% (or greater).	Table 4.3-1 Note (2)	SR 3.3.1.4



Discussion of Change	Summary of Change	CTS Section	ITS Section
3.3.1 M.3	Requires testing within 12 hours after reaching required thermal power level.	Table 4.3-1 Note (3), (7), (8)	SR 3.3.1.2 SR 3.3.1.5 SR 3.3.1.6
3.3.2 M.1	Removal of option to make the CPCs OPERABLE in MODES 3*, 4* and 5* and requires that the Logarithmic Power Level - High Setpoints be reduced.	Table 3.3-1 1.B.2.a	Table 3.3.2-1 1.
		Table 3.3-1 1.C.2	Table 3.3.2-1 1.
		Table 3.3-1 Action 10	Table 3.3.2-1 1.
3.3.2 M.2	Requires opening of all RTCBs within 1 hour placing the Unit in MODE 3.	Table 3.3-1 Actions	LCO 3.3.2 Action E
3.3.3 None	N/A	N/A	N/A
3.3.4 M.1	Requires that all six channels of The RPS Matrix Logic must be OPERABLE. Includes a note regarding the applicability of the Action if three RPS Matrix Logic channels are inoperable due to a common power source failure de-energizing three matrix power supplies.	CTS Table 3.3-1 Item II.A	LCO 3.3.4 LCO 3.3.4 Action A
3.3.5 None	N/A	N/A	N/A
3.3.6 M.1	Requires that all six channels of the ESFAS Matrix Logic must be OPERABLE.	Table 3.3 Item I.B	LCO 3.3.6 LCO 3.3.6 Action A
		Table 3.3 Item III.B.1	LCO 3.3.6 LCO 3.3.6 Action A

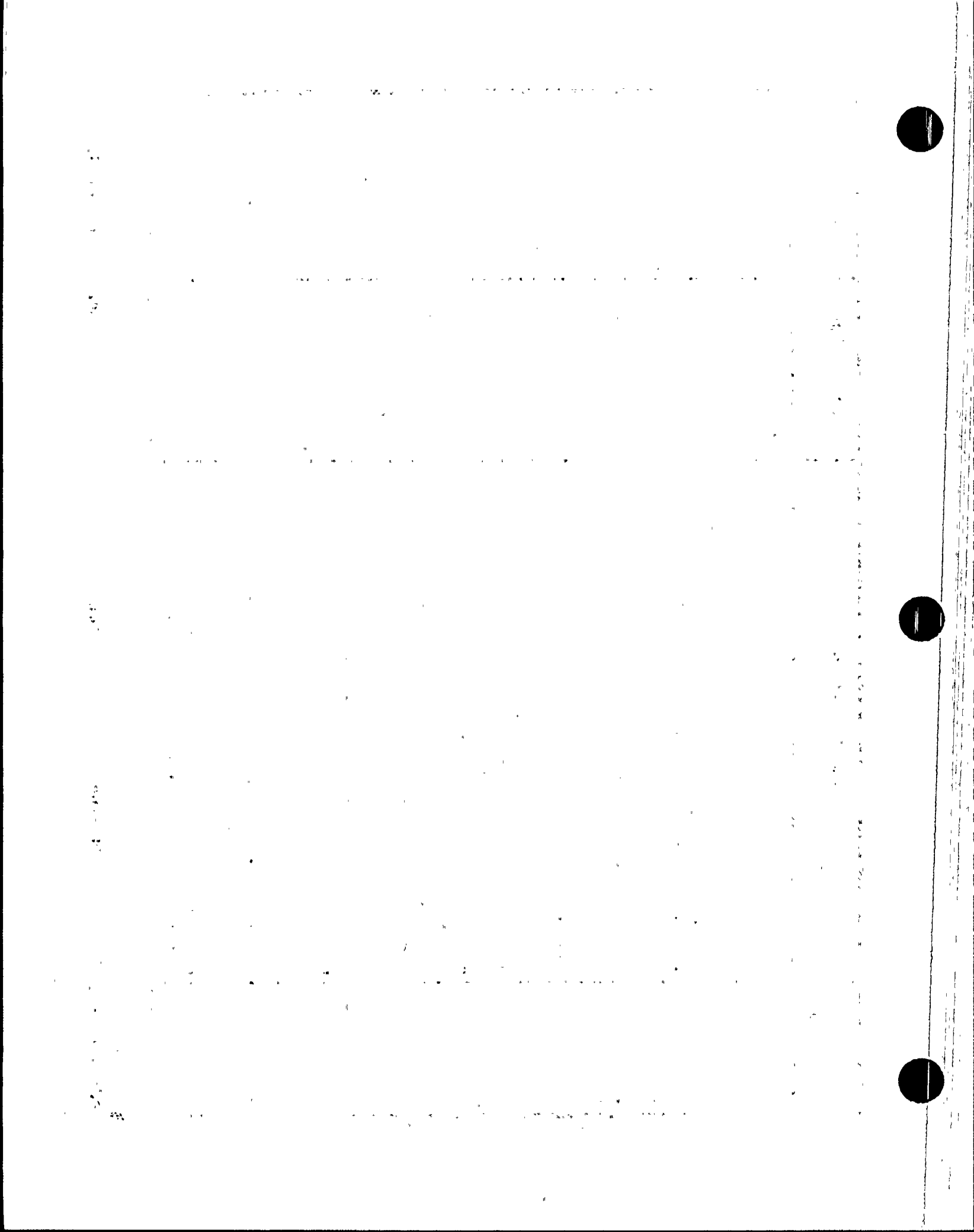


Discussion of Change	Summary of Change	CTS Section	ITS Section
		Table 3.3 Item IV.B	LCO 3.3.6 LCO 3.3.6 Action A
		Table 3.3 Item V.B	LCO 3.3.6 LCO 3.3.6 Action A
3.3.6 M.1	Requires that all six channels of the ESFAS Matrix Logic must be OPERABLE.	Table 3.3 Item VI.B	LCO 3.3.6 LCO 3.3.6 Action A
		Table 3.3 Item VII.B	LCO 3.3.6 LCO 3.3.6 Action A
3.3.6 M.2	Requires reducing plant status to MODE 5 for inoperable SIAS, CIAS, and RAS Function Automatic Actuation Logic.	Table 3.3-3 Action 16	LCO 3.3.6 Action F
3.3.7 M.1	Requires Diesel Generator Loss of Voltage (LOV) Start to be OPERABLE in MODE 4 and when required by ITS LCO 3.8.2	Table 3.3-3 VIII	LCO 3.3.7 Applicability
	Requires Diesel Generator Loss of Voltage (LOV) Start OPERABLE when required by ITS LCO 3.8.2	Table 3.3-4 VIII	LCO 3.3.7 Applicability
		Table 4.3-2 VIII	LCO 3.3.7 Applicability
3.3.7 M.2	Requires performance of Delay Time testing for both channels of Loss of Voltage Relays and Degraded Voltage Relays at 18 month intervals and specification of values.	SR 4.3.2.3	SR 3.3.7.3
		Table 3.3-4 VIII.A	SR 3.3.7.3
		Table 3.3-4 VIII.B	SR 3.3.7.3





Discussion of Change	Summary of Change	CTS Section	ITS Section
3.3.7 M.3	Requires that the applicable LCO for the associated DG (made INOPERABLE) be entered if unable to comply with Required Action B.2.	LCO 3.3.2	LCO 3.3.7 Action B
3.3.7 M.4	Requires that both the Degraded Voltage and Under Voltage Relays be restored to operability within one hour.	LCO 3.3.2 Action 19.a	LCO 3.3.7 Action C
3.3.8 M.1	Not Used	N/A	N/A
3.3.8 M.2	Requires entry into ITS LCO 3.6.3 CONTAINMENT ISOLATION VALVE if the required Action and associated Completion Time of ITS 3.3.8 Condition A is not met.	LCO 3.3.3.1 Table 3.3-6 1.D	LCO 3.3.8 Action B
3.3.8 M.3	Requires a CHANNEL FUNCTIONAL TEST of the CPIAS actuation logic channel	SR 4.4.9	SR 3.3.8.3
	Requires a CHANNEL FUNCTIONAL TEST of the CPIAS manual trip.	SR 4.4.9	SR 3.3.8.5
3.3.8 M.4	Deletes allowance that radiation monitoring channel alarm/trip setpoints can be outside of the allowable values for up to 4 hours.	LCO 3.3.3.1 Action a	LCO 3.3.8
3.3.8 M.5	Deletes exemptions for Specifications 3.0.3 and 3.0.4.	LCO 3.3.3.1 Action c	LCO 3.3.8
3.3.8 M.6	Specifies requirement for CPIAS Manual Trip and Actuation Logic in MODES 1, 2, 3 and 4.	LCO 3.3.3.1	LCO 3.3.8
3.3.9 M.1	Deletes allowance that radiation monitoring channel alarm/trip setpoints can be outside of the allowable values for up to 4 hours.	LCO 3.3.3.1 Action a	LCO 3.3.9
3.3.9 M.2	Deletes exemptions for Specifications 3.0.3 and 3.0.4.	LCO 3.3.3.1 Action c	LCO 3.3.9



Discussion of Change	Summary of Change	CTS Section	ITS Section
		LCO 3.3.2 Table 3.3-3 Notation *	LCO 3.3.9
3.3.9 M.3	Requires a CHANNEL FUNCTIONAL TEST of the CREFAS actuation logic channel.	LCO 3.3.3.1	SR 3.3.9.3
3.3.9 M.4	Requires a CHANNEL FUNCTIONAL TEST of the CREFAS manual trip channel.	LCO 3.3.3.1	SR 3.3.9.5
3.3.9 M.5	Requires that CREFAS be OPERABLE during the movement of irradiated fuel assemblies.	LCO 3.3.3.1 Table 3.3-6 Item 2.B	LCO 3.3.9
		LCO 3.3.3.1 Table 4.3-3 Item 2.B	LCO 3.3.9
3.3.9 M.6	Adds additional Actions for inoperable CREFAS equipment in MODES 5, 6 and during the movement of irradiated fuel assemblies.	LCO 3.3.3.1 Action 26	LCO 3.3.9 Action C
		LCO 3.3.2 Action 18	LCO 3.3.9 Action C
3.3.9 M.7	Requires that essential ventilation be placed in operation within one hour.	LCO 3.3.2 Action 18	LCO 3.3.9 Action A
3.3.10 M.1	Requires two channels of CETs per quadrant, each channel consisting of two sensors.	LCO 3.3.3.6 Table 3.3-10 Item 14	LCO 3.3.10 Table 3.3.10-1 Items 14, 15, 16 and 17
3.3.10 M.2	Adds three additional functions (Containment Isolation Valve Position Indication, Reactor Coolant System Activity Indication and Condensate Storage Tank Level Indication) to the list of Post Accident Monitoring (PAM) Instrumentation.	LCO 3.3.3.6	LCO 3.3.10 Table 3.3.10-1 Items 8, 13 and 20



Discussion of Change	Summary of Change	CTS Section	ITS Section
3.3.10 M.3	Moves the Containment Hydrogen Monitors to the PAM specification and adds an additional MODE requirements (MODE 3)	LCO 3.6.4.1	LCO 3.3.10 Table 3.3.10-1 Item 10
3.3.10 M.4	Requires the plant to be in MODE 4 within 12 hours with both hydrogen monitors inoperable.	LCO 3.6.4.1 Action b	LCO 3.3.10 Table 3.3.10-1 Item 10 (Action F)
3.3.11 M.1	Requires OPERABILITY of the Remote Shutdown System in MODE 3.	LCO 3.3.3.5	LCO 3.3.11
3.3.11 M.2	Requires the unit to be in MODE 3 within 6 hours and MODE 4 within 12 hours.	LCO 3.3.3.5 Action a	LCO 3.3.11
		LCO 3.3.3.5 Action b	LCO 3.3.11
3.3.12 M.1	Does not exclude Specification 3.0.3.	LCO 3.1.2.7 Action c	LCO 3.3.12
3.3.12 M.2	Adds the requirement for a CHANNEL CALIBRATION for the BDAS.	SR 4.1.2.7	SR 3.3.12.3
3.3.12 M.3	Adds action to require suspension of all operations involving positive reactivity additions if RCS Boron Concentration can not be monitored periodically.	LCO 3.1.2.6 Action a.1	LCO 3.3.12 Action B
3.4.1 M.1	Requires MODE 1 performance of surveillance measuring RCS flow rate under normal operating conditions at power with all RCPs running.	SR 4.2.5	SR 3.4.1.3
3.4.2 None	N/A	N/A	N/A
3.4.3 M.1	Excludes CTS 30 minute allowance to restore temperature and/or pressure to within limits following their violation, and 36 hour allowance to reduce pressure if 30 minute requirement not met.	LCO 3.4.8.1 Action	LCO 3.4.3 Action C



Discussion of Change	Summary of Change	CTS Section	ITS Section
3.4.4 None	N/A	N/A	N/A
3.4.5 M.1	Requires immediate suspension of all operations involving a reduction of boron concentration when no RCS loop is in operation.	LC0 3.4.1.2 Action b	LC0 3.4.5 Action C.1
3.4.5 M.2	Restricts the amount of time that all RCPs may be de-energized to one hour per eight hour period.	LC0 3.4.1.2 Footnote *	LC0 3.4.5 Note
3.4.5 M.3	Imposes Action requirements when no reactor coolant loops are OPERABLE instead of just when no reactor coolant loop is in operation.	LC0 3.4.1.2 Action b	LC0 3.4.5 Action C
3.4.6 M.1	Requires immediate suspension of all operations involving a reduction of boron concentration when no RCS loop is in operation.	LC0 3.4.1.3 Action b	LC0 3.4.6 Action C.1
3.4.6 M.2	Restricts the amount of time that all RCPs may be de-energized to one hour per eight hour period.	LC0 3.4.1.3 Footnote *	LC0 3.4.6 Note 1
3.4.6 M.3	Requires verification of correct breaker alignment and indicated power available to the required SDC pump that is not in operation.	SR 4.4.1.3.1	SR 3.4.6.3
3.4.7 M.1	Requires verification of correct breaker alignment and indicated power available to the required SDC pump that is not in operation.	LC0 3.4.1.4.1	SR 3.4.7.3
3.4.7 M.2	Restricts the amount of time that all RCPs may be de-energized to one hour per eight hour period.	LC0 3.4.1.4.1	LC0 3.4.7 Note 1





Discussion of Change	Summary of Change	CTS Section	ITS Section
3.4.7 M.3	Requires immediate suspension of all operations involving a reduction of boron concentration when no RCS loop is in operation.	LC0 3.4.1.4.1 Action b	LC0 3.4.7 Action B.1
3.4.8 M.1	Introduces an additional requirement to the LC0 Note that allows the SDC loops to be de-energized that disallows all draining operations that would further reduce the RCS water volume.	LC0 3.4.1.4.2 Note *	LC0 3.4.8 Note 1
3.4.8 M.2	Requires verification of correct breaker alignment and indicated power available to the required SDC pump that is not in operation.	LC0 3.4.1.4.2	SR 3.4.8.2
3.4.8 M.3	Requires immediate suspension of all operations involving a reduction of boron concentration when no RCS loop is in operation.	LC0 3.4.1.4.2 Action b	LC0 3.4.8 Action B.1
3.4.8 M.4	Restricts the amount of time that all RCPs may be de-energized to one hour per eight hour period.	LC0 3.4.1.4.2 Note *	LC0 3.4.8 Note 1
3.4.8 M.5	Requires immediate suspension of all operations involving a reduction of boron concentration when no RCS loop is in operation.	LC0 3.4.1.4.2 Action b	LC0 3.4.8 Action B
3.4.9 M.1	Removes one hour allowance to restore pressurizer level before entering 6 hour period to transition to MODE 3	LC0 3.4.3.1 Action b	LC0 3.4.9 Action A
3.4.10 M.1	Additional requirement that following testing the lift settings for the pressurizer PSV's be within +/- 1% of the specified value.	4.4.2.2	SR 3.4.10.1
3.4.11 M.1	Additional SR to ensure that the required Shutdown Cooling System suction line relief valve is OPERABLE.	LC0 3.4.2.1	LC0 SR 3.4.11.2



Discussion of Change	Summary of Change	CTS Section	ITS Section
		LC0 3.4.2.1	LC0 SR 3.4.11.3
3.4.11 M.2	Satisfaction of the Action statement requires the plant to be not only placed in MODE 4, but the additional requirement of any RCS cold leg temperatures $\leq$ being 214°F. during cooldown or $\leq$ 291°F. during heatup.	LC0 3.4.2.1	LC0 3.4.11 Action A.3
3.4.11 M.3	Additional requirement that following testing the lift settings for the pressurizer PSV's be within +/- 1% of the specified value.	4.4.2.1	SR 3.4.11.1
3.4.12 M.1	Changes the end-state MODE (less than 385 psia) for Pressurizer Vents required Action to place the plant in a condition where the LCO no longer applies.	LC0 3.4.10	LC0 3.4.12 Action C
3.4.13 None	N/A	N/A	N/A
3.4.14 None	N/A	N/A	N/A
3.4.15 M.1	Allows the use of the second in-line PIV to fulfill isolation requirements, but requires that the RCS PIV be restored to within limits within 72 hours.	LC0 3.4.5.2	LC0 3.4.15 Action A
3.4.15 M.2	Requires entry into applicable Conditions and Required Actions for systems made inoperable by an inoperable PIV.	LC0 3.4.5.2	LC0 3.4.15 Actions Note 2
3.4.15 M.3	Requires that each valve used to satisfy Required Action A.1 and Required Action A.2 be verified to meet SR 3.4.15.1 and be on the RCS pressure boundary.	LC0 3.4.5.2	LC0 3.4.15 Action A



Discussion of Change	Summary of Change	CTS Section	ITS Section
3.4.16 M.1	Requires that SR 3.4.14.1 (RCS water inventory balance) be performed once per 24 hours when the required containment sump monitor or containment atmosphere radioactivity monitor is inoperable.	LC0 3.4.5.1	LC0 3.4.16 Action A
3.4.16 M.2	Requires that LC0 3.0.3 entry be made when all required monitors are inoperable.	LC0 3.4.5.1	LC0 3.4.16 Action D
3.4.16 M.3	Requires that both the gaseous and particulate containment atmospheric radiation monitors be OPERABLE.	3.4.5.1a	3.4.16.b
3.4.17 M.1	Requires the performance of the surveillance to verify RCS DOSE EQUIVALENT I-131 specific activity $\leq 1.0$ microcurie/gram in addition to unit SHUTDOWN to MODE 3 with $T_{\text{cold}} < 500^{\circ}\text{F}$ .	LC0 3.4.7 Action B	LC0 3.4.17 Action C.1
3.4.17 M.2	Requires E-Bar surveillance performance within 31 days after a minimum of 2 EFPD and 20 days of MODE 1 operation have elapsed since the reactor was last subcritical for $\geq 48$ hours should the 184 day Frequency interval be exceeded.	LC0 3.4.7 Table 4.4-4 Item 3	SR 3.4.17.3
3.5.1 M.1	Specifies a time requirement for verification of boron concentration whenever a SIT is drained.	SR 4.5.1.b	SR 3.5.1.4
3.5.2 M.1	Requires that the plant be taken to MODE 5 (where LC0 is no longer applicable) if the SIT can not be returned to OPERABLE status.	LC0 3.5.1 Action a	LC0 3.5.2 Action C.1
		LC0 3.5.1 Action b	LC0 3.5.2 Action C.1
3.5.3 None	None	None	None
3.5.4 None	None	None	None



Discussion of Change	Summary of Change	CTS Section	ITS Section
3.5.5 None	N/A	N/A	N/A
3.5.6 None	N/A	N/A	N/A
3.6.1 None	N/A	N/A	N/A
3.6.2 M.1	Requires verification that the OPERABLE air lock door is closed within one hour.	LCO 3.6.1.3 Action a.1	LCO 3.6.2 Action A.1, B.1, C.2
		LCO 3.6.1.3 Action b	LCO 3.6.2 Action A.1, B.1, C.2
3.6.3 M.1	Requires that leakage rate testing be performed at least once every 92 days for purge valves with resilient seals which are used to isolate penetrations with one or more purge valves exceeding the leakage limit.	LCO 3.6.1.7 Action c	LCO 3.6.3 Action D.3
3.6.3 M.2	Requires that penetration valves be closed to be considered in the isolation position.	LCO 3.6.3 Action 1.b	LCO 3.6.3 Action A
3.6.3 M.2	Requires that penetration valves be closed to be considered in the isolation position.	LCO 3.6.3 Action 1.b	LCO 3.6.3 Action C
3.6.3 M.3	Requires leakage rate testing of valves every 184 days and within 92 days after opening.	SR 4.6.1.7.2	SR 3.6.3.6
3.6.4 None	N/A	N/A	N/A
3.6.5 None	N/A	N/A	N/A
3.6.6 None	N/A	N/A	N/A





Discussion of Change	Summary of Change	CTS Section	ITS Section
3.6.7 M.1	Does not allow the option of using the Hydrogen Purge System as a replacement for an inoperable hydrogen recombiner for an indefinite period of time.	LCO 3.6.4.2 Action	LCO 3.6.7 Action
		LCO 3.6.4.3 Action	LCO 3.6.7 Action
3.7.1 M.1	Places the same OPERABILITY requirements on the safety devices of both steam generators whether that specific steam generator is in operation or not.	LCO 3.7.1.1 Action b	LCO 3.7.1 Action B
3.7.1 M.2	Requires that as-left settings of each MSSV be in compliance within $\pm 1\%$ of value specified in ITS Table 3.7.1-2.	SR 4.7.1.1	SR 3.7.1.1
3.7.1 M.3	Requires that if inoperable MSSV are not restored to OPERABILITY or if the RTP and VOPT are not reduced within 4 hours, the unit be placed in a MODE where the LCO does not apply.	LCO 3.7.1.1 Action a	LCO 3.7.1 Action B.2
3.7.1 M.4	Limits the amount of time that the plant can operate in MODE 3 to 12 hours before going to MODE 4 if more than four MSSVs are inoperable on one steam generator.	LCO 3.7.1.1 Action b	LCO 3.7.1 Action B.2
3.7.2 M.1	Requires that inoperable MSIVs be closed within 4 hours and verified closed once per seven days.	LCO 3.7.1.5 Action a	LCO 3.7.2 Action C
3.7.3 M.1	Requires verification of penetration isolation for inoperable MFIV once per seven days.	LCO 3.6.3 Action 1.b	LCO 3.7.3 Action A
3.7.3 M.2	Requires that with two MFIVs in the same flow path inoperable, the affected flow path be isolated within eight hours and the inoperable MFIV verified closed or isolated once per seven days.	LCO 3.6.3 Actions	LCO 3.7.3 Action B



Discussion of Change	Summary of Change	CTS Section	ITS Section
3.7.3 M.3	Specifies limiting stroke times for MFIVs to be $\leq 9.6$ seconds on an actual or simulated actuation signal while testing in accordance with the IST program.	SR 4.6.3.5	SR 3.7.3.1
3.7.4 M.1	Reduces the time allowed to restore one ADV to Operability (from 72 to 24 hours) when no ADVs are OPERABLE.	LCO 3.7.1.6	LCO 3.7.4 Action B
3.7.4 M.2	Requires that the unit be placed in MODE 4 without reliance upon steam generators for heat removal within 24 hours of entering the Condition (i.e. the following 18 hours) instead of just placing the unit in MODE 3 within 6 hours.	LCO 3.7.1.6	LCO 3.7.4 Action C
3.7.5 M.1	Requires verification (via measurement of pump d/p at a reference flow rate) that the developed head of each AFW pump at the flow test point is greater than or equal to the required developed head.	SR 4.7.1.2.b.1	SR 3.7.5.2
3.7.5 M.2	Requires testing of the turbine driven AFW pump within 72 hours of reaching test conditions.	SR 4.7.1.2.b.1	SR 3.7.5.2 SR 3.7.5.3 SR 3.7.5.4
		SR 4.7.1.2.e	SR 3.7.5.2 SR 3.7.5.3 SR 3.7.5.4
3.7.5 M.3	Adds an Action to require that with one steam supply to the turbine driven auxiliary feedwater pump inoperable, restoration of the steam supply system to OPERABLE status must be complete within 7 days and 10 days from discovery of the failure to meet the LCO.	LCO 3.7.1.2	LCO 3.7.5 Action A



Discussion of Change	Summary of Change	CTS Section	ITS Section
	Require that with one AFW train inoperable for reasons other than Condition A (of ITS 3.7.5) in MODES 1, 2, or 3, restoration of the AFW train to OPERABLE status must be complete within 10 days of discovery of the failure to meet the LCO.	LCO 3.7.1.2 Action a	LCO 3.7.5 Action B
3.7.5 M.4	Removes requirement to do flow testing on a Staggered Test Basis, requiring testing prior to entering MODE 2 whenever the unit has been in MODE 5 or 6 for more than 30 days.	SR 4.7.1.2.d	SR 3.7.5.5
3.7.6 M.1	Deletes previous MODE 4 exclusion of LCO when cooldown is in progress.	LCO 3.7.1.3	LCO 3.7.6
3.7.6 M.2	Imposes an end-state requirement of "MODE 4 without reliance on steam generator for heat removal" in situations where the Condensate Storage Tank is inoperable and the backup water supply (RWMT) is also inoperable.	LCO 3.7.1.3 Action a	LCO 3.7.6 Action B
3.7.7 M.1	Extends the testing scope of automatic valves that service safety related equipment to all in the flow path.	SR 4.7.3.b	SR 3.7.7.2
3.7.8 M.1	Requires testing of the automatic actuation function of ESPS pumps	SR 4.7.4	SR 3.7.8.2
3.7.9 None	N/A	N/A	N/A
3.7.10 M.1	Not Used	N/A	N/A
3.7.10 M.2	Requires that the proper actuation of each EC System component be verified upon receipt of an actual or simulated test signal at 18 month intervals.	SR 4.7.6	SR 3.7.10.2
3.7.11 M.1	Increases scope of CREFS LCO MODE applicability to include "during movement of irradiated fuel assemblies."	LCO 3.7.7	LCO 3.7.11



Discussion of Change	Summary of Change	CTS Section	ITS Section
3.7.11 M.2	Includes Actions for the condition "during movement of irradiated fuel assemblies."	LC0 3.7.7	LC0 3.7.11 Action D
3.7.11 M.3	Requires suspending movement of irradiated fuel assemblies.	LC0 3.7.7 Action b	LC0 3.7.11 Action E
3.7.12 M.1	Increases scope of CREATCS MODE applicability to include "during movement of irradiated fuel assemblies."	LC0 3.7.7	LC0 3.7.12
3.7.12 M.2	Requires verification at 18 month intervals that each CREATCS train has the capability to remove the assumed heat load.	SR 4.7.7.d.4	SR 3.7.12.1
3.7.12 M.3	Adds requirement to suspend movement of irradiated fuel assemblies.	LC0 3.7.7 Action b	LC0 3.7.12 Action D
		LC0 3.7.7 Action b	LC0 3.7.12 Action E
3.7.12 M.4	Includes Actions for the condition "during movement of irradiated fuel assemblies."	LC0 3.7.7	LC0 3.7.12 Action D
3.7.13 M.1	Not Used	N/A	N/A
3.7.13 M.2	Requires verification that the ESF PREACS is capable of maintaining the lower levels of the auxiliary building at a measurable negative pressure at 18 month intervals on a STAGGERED TEST BASIS.	SR 4.7.8	SR 3.7.13.4
3.7.14 None	N/A	N/A	N/A
3.7.15 None	N/A	N/A	N/A
3.7.16 M.1	Requires that Dose Equivalent I-131 be verified to be within limits at 31 day intervals.	SR 4.7.1.4 Table 4.7-1	LC0 3.7.16





Discussion of Change	Summary of Change	CTS Section	ITS Section
3.7.17 M.1	Specifies requirements for the allowed storage locations of spent fuel assemblies within the spent fuel storage racks depending on initial enrichment and existing burnup.	Design Features 5.3 (No LCO Existed)	LCO 3.7.17
3.8.1 M.1	Requires that load sequencers be OPERABLE for Trains A and B.	LCO 3.8.1.1	LCO 3.8.1.c
	Specifies Required Actions for inoperable load sequencers.	LCO 3.8.1.1	LCO 3.8.1 Action F
3.8.1 M.2	Requires a check and removal of water for diesel fuel day tanks every 92 days.	LCO 3.8.1.1	SR 3.8.1.5
3.8.1 M.3	Adds requirement that voltage be $\geq 3740$ V and frequency be $\geq 58.8$ Hz in $\leq 10$ seconds.	SR 4.8.1.1.2.d.4	SR 3.8.1.12.a
	Adds requirement that permanently connected loads remain energized from the offsite power system.	SR 4.8.1.1.2.d.4	SR 3.8.1.12.d
	Adds requirement that emergency loads are energized (auto-connected through the automatic load sequencer) from the offsite power system.	SR 4.8.1.1.2.d.4	SR 3.8.1.12.e
3.8.1 M.4	Removes option to use LOP or LOCA signals as single sources to initiate the surveillance to verify that all automatic DG trips are bypassed during emergency operation.	SR 4.8.1.1.2.d.6	SR 3.8.1.13
3.8.1 M.5	Specifies a diesel start "from standby condition."	SR 4.8.1.1.2.a.2	SR 3.8.1.2
3.8.1 M.6	Not Used	N/A	N/A
3.8.2 M.1	Adds "During movement of irradiated fuel assemblies" to the LCO applicability.	LCO 3.8.1.2	LCO 3.8.2



Discussion of Change	Summary of Change	CTS Section	ITS Section
3.8.2 M.2	Adds a Required Action to "immediately declare affected required feature(s) inoperable with no offsite power available."	LC0 3.8.1.2	LC0 3.8.2
3.8.3 M.1	Adds a Require Action for lube oil inventory	LC0 3.8.1.2	LC0 3.8.2 Action B
	Adds a Require Action for starting air receiver pressure.	LC0 3.8.1.2	LC0 3.8.2 Action E
	Adds a Surveillance Requirement for lube oil inventory.	LC0 3.8.1.2	SR 3.8.3.2
3.8.3 M.1	Adds a Surveillance Requirement for starting air receiver pressure.	LC0 3.8.1.2	SR 3.8.3.4
3.8.3 M.2	Specifies Action Requirements based on stored diesel fuel particulates rather than on viscosity and reduces response period to 7 days.	LC0 3.8.1.3.1 Action b	LC0 3.8.3 Action C
	Specifies Action Requirements for new diesel fuel with properties outside of established limits.	LC0 3.8.1.3.1 Action c	LC0 3.8.3 Action D
	Imposes a 92 day Surveillance for diesel fuel particulate properties.	SR 4.8.1.3.1.2	SR 3.8.3.3
3.8.3 M.3	Requires that each diesel fuel oil storage tank be checked for accumulated water and removal of any found.	LC0 3.8.1.3.1	SR 3.8.3.5
3.8.4 M.1	Adds an additional battery testing frequency requirement to perform a battery performance discharge test at least every 24 months when the battery has reached 85% of the expect life with capacity > 100% of manufacturer's rating.	SR 4.8.2.1.e	SR 3.8.4.8
		SR 4.8.2.1.f	SR 3.8.4.8
3.8.4 M.2	Not Used	N/A	N/A



Discussion of Change	Summary of Change	CTS Section	ITS Section
3.8.4 M.3	Not Used	Not Used	Not Used
3.8.4 M.4	Adds restriction that the surveillance shall not be performed on MODES 1, 2, 3, and 4 on the charger credited for OPERABILITY.	SR 4.8.2.1.c.4	SR 3.8.4.6
3.8.4 M.5	Adds a requirement that the battery charger be restored to OPERABLE within 24 hours when the battery has been verified to meet Category A limits.	LCO 3.8.2.1 Action b	LCO 3.8.4 Action C
3.8.4 M.6	The ITS definition of battery degradation is changed such that degradation is indicated when the battery capacity drops by more than 10% relative to the capacity on the previous performance test rather than the average of previous tests. This is more restrictive when the results of the previous test are higher than the average of the previous performance tests.	4.8.2.1.f	SR 3.8.4.8 Bases
3.8.5 M.1	Adds "During movement of irradiated fuel assemblies" to the MODE applicability.	LCO 3.8.2.2	LCO 3.8.5
3.8.5 M.2	Not Used	N/A	N/A
3.8.5 M.3	Not Used	N/A	N/A
3.8.5 M.5	Adds a requirement that the battery charger be restored to OPERABLE within 24 hours when the battery has been verified to meet Category A limits	LCO 3.8.2.2 Action b	LCO 3.8.5 Action C
3.8.6 M.1	Changes the DC source Applicability (LCO 3.8.5) to support distribution subsystems required by LCO 3.8.10 and to include fuel handling in all MODES. Also more than one of the DC electrical power subsystems may be required in MODES 5 and 6 since the DC sources Applicability has been changed.	LCO 3.8.2.1	LCO 3.8.6



Discussion of Change	Summary of Change	CTS Section	ITS Section
	Adds a NOTE to the Actions stating "Separate Condition entry is allowed for each battery."	LCO 3.8.2.1	LCO 3.8.6 Actions
	Adds verification of all connected cells instead of just pilot cells and ensures that Category C limits are met via periodic verification. Also provides for immediately declaring the battery inoperable if temperature is < 60°F. or if any Category C limits are not met.	LCO 3.8.2.1 Action b	LCO 3.8.6 Action A
	Provides for immediately declaring the battery inoperable if temperature is < 60°F. or if any Category C limits are not met.	LCO 3.8.2.1 Action b	LCO 3.8.6 Action B
3.8.6 M.2	Places additional requirements on using battery charge current of < 2 amps as a temporary substitute for specific gravity.	LCO 3.8.2.1 Table 4.8-2	LCO 3.8.6 Table 3.8.6-1
3.8.7 M.1	Only allows one inverter to be disconnected from its associated DC bus for the purpose of performing an equalizing charge on the associated battery.	LCO 3.8.3.1	LCO 3.8.7
3.8.7 M.2	Requires verification of proper inverter frequency output in addition to proper voltage.	SR 4.8.3.1	SR 3.8.7.1
3.8.8 M.1	Adds "During movement of irradiated fuel assemblies" to the MODE applicability (with a NOTE that makes Action A.2.3 not applicable in operational MODES 1, 2, 3, and 4).	LCO 3.8.3.2	LCO 3.8.8
3.8.8 M.2	Requires verification of proper inverter frequency output in addition to proper voltage.	SR 4.8.3.2	SR 3.8.8.1
3.8.9 M.1	Imposes an additional Completion Time for each Condition that requires Operability restoration within 16 hours of failure to meet the LCO.	LCO 3.8.3.1	LCO 3.8.9





Discussion of Change	Summary of Change	CTS Section	ITS Section
3.8.9 M.2	Adds an additional Action E to enter LCO 3.0.3 immediately if two or more inoperable distribution subsystems result in a loss of a required safety function.	LCO 3.8.3.1	LCO 3.8.9 Action E
3.8.10 M.1	Imposes an additional Required Action that states "Declare associated required shutdown cooling subsystem(s) inoperable and not in operation."	LCO 3.8.3.2	LCO 3.8.10 Action A.2.5
3.8.10 M.2	Adds "During movement of irradiated fuel assemblies." to the MODE Applicability.	LCO 3.8.3.2	LCO 3.8.10
3.9.1 None	N/A	N/A	N/A
3.9.2 M.1	Imposes an additional Action for both required Source Range monitors (SRM) inoperable that stipulates immediate action be taken to restore one SRM to operable status.	LCO 3.9.2 Action b	LCO 3.9.2 Action B.1
3.9.2 M.2	With both SRMs inoperable, adds the requirement to determine the boron concentration of the refueling canal within 4 hours and at least once per 12 hours thereafter.	LCO 3.9.2 Action b	LCO 3.9.2 Action B.2
3.9.2 M.3	Requires a CHANNEL CALIBRATION of the SRMs instead of just a CHANNEL FUNCTIONAL TEST.	SR 4.9.2.b	SR 3.9.2.2
		SR 4.9.2.c	SR 3.9.2.2
3.9.3 None	N/A	N/A	N/A
3.9.4 M.1	Restricts provisions of NOTE by the statement "...provided no operations are permitted that would cause reduction of the Reactor Coolant System boron concentration."	LCO 3.9.8.1	LCO 3.9.4



Discussion of Change	Summary of Change	CTS Section	ITS Section
3.9.5 M.1	Restricts provisions of NOTE by the statement "...provided no operations are permitted that would cause reduction of the Reactor Coolant System boron concentration."	LCO 3.9.8.2	LCO 3.9.5
3.9.5 M.2	Requires that both SDC loops be verified OPERABLE in addition to the CTS requirement that a SDC loop be verified in operation.	SR 4.9.8.2	SR 3.9.5.1
3.9.5 M.3	Requires that power be verified to the SDC pump that is not in operation.	SR 4.9.8.2	SR 3.9.5.2
3.9.6 M.1	Expands the MODE applicability of the LCO from just when fuel is being moved within the Reactor Vessel to whenever fuel is being moved within containment.	LCO 3.9.10	LCO 3.9.6
3.9.7 None	N/A	N/A	N/A
4.0 None	N/A	N/A	N/A
5.0 M.1	Requires advance authorization of deviation from the overtime guidelines.	Section 6.2.2.C	Section 5.4.1.d
5.0 M.2	Requires procedures for TS required programs.	Section 6.8.1	Section 5.4.1.e
5.0 M.3	Requires that procedures include provisions to ensure that sufficient margin is maintained in CPC type I addressable constants to avoid excessive operator interaction with CPCs during reactor operation.	Section 6.8.1.g	Section 5.4.1.f
5.0 M.4	Adds three new programs: 5.5.13 (Diesel Fuel Testing Program), 5.5.14 (Technical Specification [TS] Bases Control Program and 5.5.15 (Safety Functions Determination Program [SFDP])	Section 6.8.1	Section 5.5.13 Section 5.5.14 Section 5.5.15



Discussion of Change	Summary of Change	CTS Section	ITS Section
5.0 M.5	Adds the requirement to test the ESF pump room exhaust air cleanup system in accordance with ASME N510-1980.	SR 4.7.8.d	Section 5.5.11.e



Table of PVNGS Relocated Details (LA)

ITS Number	LA Number	CTS Number	Description	Destination Document	Type of Change
1.1	LA.1	1.22 (Definitions)	Definition of PLANAR RADIAL PEAKING FACTOR.	Bases	2
1.1	LA.2	1.24 (Definitions)	Definition of PROCESS CONTROL PROGRAM (PCP).	ODCM	1
1.1	LA.3	Table 1.2 (Operational Modes)	$K_{eff}$ requirement for MODE 6.	TRM	1
1.1	LA.4	Table 1.2 (Operational Modes)	Cold leg temperature requirement for MODE 6.	TRM	1
1.1	LA.5	Table 1.2 (Operational Modes)	Cold leg temperature requirement for MODEs 1 and 2.	TRM	1
2.1	LA.1	6.7.1.a	Requirement to notify the OSRC Chairman within 24 hours of Safety Limit Violation.	QA Program Description	3
2.1	LA.1	6.7.1.c	Submittal of Safety Limit Violation Report to the OSRC Chairman.	QA Program Description	3
2.1	LA.2	6.7.1.b	Safety Limit Violation Report reviewed by PRB.	QA Program Description	3
3.0	None	N/A	N/A	N/A	N/A
3.1.1	LA.1	3.1.1.1 (Action)	Specific values for flowrate and boron concentration.	Bases	1
3.1.1	LA.2	4.1.1.1.1	SHUTDOWN MARGIN consideration factors.	Bases	2
3.1.1	LA.3	Not Used	N/A	N/A	N/A

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ITS Number	LA Number	CTS Number	Description	Destination Document	Type of Change
3.1.2	LA.1	3.1.1.2 (Action a)	Specific values for flowrate and boron concentration.	Bases	1
3.1.2	LA.1	3.1.1.2 (Action b)	Specific values for flowrate and boron concentration.	Bases	1
3.1.2	LA.2	4.1.1.2.1.e	SHUTDOWN MARGIN consideration factors.	Bases	2
3.1.2	LA.2	4.1.1.2.2 (1-6)	SHUTDOWN MARGIN consideration factors.	Bases	2
3.1.2	LA.2	4.1.1.2.3 (1-6)	SHUTDOWN MARGIN consideration factors.	Bases	2
3.1.2	LA.3	Not Used	N/A	N/A	N/A
3.1.2	LA.4	4.1.1.2.1.c	Verify predicted critical CEA position is within limits.	TRM	1
3.1.2	LA.5	4.1.1.2.1.d	Prior to initial operation <5% following fuel loading consider SHUTDOWN MARGIN factors at the Transient Insertion Limits.	TRM	3
3.1.3	LA.1	4.1.1.2.4	Reference to comparison factors for overall core reactivity balance consideration.	Bases	2
3.1.4	None	N/A	N/A	N/A	N/A
3.1.5	LA.1	3.1.3.1 Action a	Discussion of cause of CEA inoperability.	Bases	2
3.1.5	LA.2	3.1.3.2	LCO Operability details of CEA indicator channels.	Bases	3
3.1.5	LA.3	3.1.3.2 Action c	Reference to method of determining when CEA is "fully out."	Bases	3
3.1.5	LA.3	3.1.3.2 Action c *	Discussion of how to determine when CEA is "fully out."	Bases	3

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ITS Number	LA Number	CTS Number	Description	Destination Document	Type of Change
3.1.5	LA.4	3.1.3.4	Specification and criteria for determining CEA drop time.	TRM	1
3.1.5	LA.5	4.1.3.4.b	Requirement to check CEA drop time following potentially impacting maintenance or modification.	Bases	3
3.1.5	LA.6	3.1.3.3	LCO and ACTION for CEA Reed Switch Position Transmitter indicator channels for CEAs not fully inserted.	TRM	3
3.1.5	LA.6	3.1.3.3 (asterisk)	Qualification that LCO is applicable in specified MODES only when reactor trip breakers are in the closed position.	TRM	3
3.1.5	LA.7	3.1.3.1 Action c.2.a	Specific details for restoring CEA group alignment.	Bases	3
3.1.6	None	N/A	N/A	N/A	N/A
3.1.7	LA.1	3.1.3.6 (LCO Note ##)	Detailed description of the CEA response to a reactor power cutback.	UFSAR	2
3.1.8	None	N/A	N/A	N/A	N/A
3.1.9	LA.1	3.10.1 Action a	Specific values for flowrate and boron concentration.	Bases	1
3.1.9	LA.1	3.10.1 Action b	Specific values for flowrate and boron concentration.	Bases	1
3.1.9	LA.2	4.10.1.3	Reactor subcriticality consideration factors.	Bases	3
3.1.10	None	N/A	N/A	N/A	N/A
3.1.11	None	N/A	N/A	N/A	N/A

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ITS Number	LA Number	CTS Number	Description	Destination Document	Type of Change
3.2.1	None	N/A	N/A	N/A	N/A
3.2.2	None	N/A	N/A	N/A	N/A
3.2.3	LA.1	3.2.3 Action b.1	Action if the AZIMUTHAL POWER TILT exceeds limits (due to CEA misalignment).	TRM	3
3.2.4	None	N/A	N/A	N/A	N/A
3.2.5	None	N/A	N/A	N/A	N/A
3.3.1	LA.1	4.3.1.5	Clarification as to which auto restart codes are not included in the total restart count.	Bases	2
3.3-1	LA.1	Table 3.3-1 Action 7	Clarification as to which auto restart codes are not included in the total restart count.	Bases	2
3.3.1	LA.2	Table 3.3-1	Information regarding the number of RPS channels required to trip the reactor.	Bases	2
3.3.1	LA.3	Table 3.3-1 Notes (a) & (c)	Clarifies channel trip/bypass requirements.	Bases	3
3.3.1	LA.4	Table 3.3-1 Action 2	Requirement that a bypass or trip of the process measurement circuit bypass or trip the associated multiple functional units (with details).	Bases	3
3.3.1	LA.4	Table 3.3-1 Action 3	Requirement that a bypass or trip of the process measurement circuit bypass or trip the associated multiple functional units (with details).	Bases	3
3.3.1	LA.5	Table 3.1-1 Action 3	Clarifies channel trip/bypass requirements.	Bases	3

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ITS Number	LA Number	CTS Number	Description	Destination Document	Type of Change
3.3.1	LA.6	Table 4.3-1 Note (6)	Discussion as to where to inject simulated process signals while verifying channel OPERABILITY.	Bases	3
3.3.1	LA.7	Table 4.3-1 Note (7)	Description of how to determine RCS total flow rate.	Bases	3
3.3.1	LA.8	Table 4.3-1 Note (7)	Discussion of flow measurement uncertainty.	Bases	4
3.3.1	LA.9	Table 4.3-1 Note (2)	Tolerances for the difference between the calorimetric calculated power and the CPC delta T. CPC nuclear and linear power levels.	TRM	4
3.3.1	LA.9	Table 4.3-1 Note (5)	Option to use incore detectors to determine CPC shape annealing matrix elements.	Bases	3
3.3.1	LA.10	Table 3.3-1 Action 2	Review considerations for maintaining an inoperable channel in the bypass condition.	QA Program Description	3
3.3.1	LA.11	2.2 Action	Requirement that an RPS function be declared inoperable if its setpoint is less conservative than the allowable value.	Bases	3
3.3.1	LA.12	2.2.1	Requirement that trip setpoints be set consistent with the values shown in Table 2.2-1 and includes the trip setpoint related content of Table 2.2-1.	UFSAR	3
3.3.1	LA.13	Table 2.2-1 note (4)	Clarification that the steam generator level setpoints are specified in percent of the instrument range, not percent of steam generator level.	UFSAR	1

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ITS Number	LA Number	CTS Number	Description	Destination Document	Type of Change
3.3.1	LA.13	Table 2.2-1 note (9)	Clarification that the steam generator level setpoints are specified in percent of the instrument range, not percent of steam generator level.	UFSAR	1
3.3.1	LA.14	Table 2.2-1 note (5)	Statement that the low DNBR and High LPD trip setpoints are stored in the CPC and include measurement, calculation and processor uncertainties.	Bases	4
3.3.1	LA.15	Table 2.2-1 note (6)	Defines the terms RATE, FLOOR and BAND.	UFSAR	1
3.3.1	LA.15	Table 2.2-1 note (8)	Defines the terms RATE, CEILING and BAND.	UFSAR	1
3.3.2	LA.1	Table 3.1-1	Lists information for each of the RPS functions to show the relationship between total, operable and required-for-trip.	Bases	2
3.3.2	LA.2	Table 3.3-1 Action 2	List of channel process measurement circuits that affect multiple units. The action requires bypassing or tripping the associated multiple functional units of an inoperable or in-test process measurement circuit.	Bases	1
3.3.2	LA.2	Table 3.3-1 Action 3	List of channel process measurement circuits that affect multiple units. The action requires that all functional units affected by a bypasses/tripped channel be placed in the bypasses/tripped condition also.	Bases	1

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ITS Number	LA Number	CTS Number	Description	Destination Document	Type of Change
3.3.2	LA.3	Table 3.3-1 Action 3	Statement that STARTUP and/or POWER OPERATION may continue until the performance of the next required CHANNEL FUNCTIONAL TEST. Subsequent STARTUP and/or POWER OPERATION may continue if one channel is restored to OPERABLE status and the provisions of ACTION 2 are satisfied.	Bases	3
3.3.2	LA.4	Table 3.3-1 Action 2	Requirement to consider the desirability of maintaining an inoperable channel in bypass in accordance with Specification 6.5.1.6.	QA Program Description	3
3.3.3	LA.1	4.3.1.4 (a. and b.)	Detailed instructions for the test requirements and the acceptance criteria for the CEA Isolation Amplifier.	Bases	1
3.3.3	LA.2	4.3.1.5	Statement that the auto restart periodic tests restart and normal system load codes shall not be included in the auto-restart total.	Bases	3
3.3.3	LA.2	Table 3.3-1 Action 7	Statement that the auto restart periodic tests restart and normal system load codes shall not be included in the auto-restart total.	Bases	3
3.3.3	LA.3	Table 4.3-1 Note (6)	Details of how to perform a CHANNEL FUNCTIONAL test and where to inject the simulated process signals.	Bases	3
3.3.4	LA.1	Table 3.3-1 Note (f)	System configuration information regarding number of channels, what each is comprised of and how they are arranged.	Bases	2

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ITS Number	LA Number	CTS Number	Description	Destination Document	Type of Change
3.3.4	LA.2	Table 3.3-1	"Channels to Trip" information for each of the RPS functions is listed in the table to show the relationship between the total number of channels, minimum required and number required for a reactor trip.	Bases	2
3.3.4	LA.3	Table 4.3-1 Note (10)	Statement requiring a CHANNEL FUNCTIONAL TEST of reactor trip breakers following maintenance or adjustment	Bases	3
3.3.5	LA.1	3.3.2	Requirement that the trip setpoints must be set consistent with the values shown in Table 3.3-4.	Bases	3
3.3.5	LA.2	3.3.2 Action a	Requirement for an ESFAS instrumentation channel trip setpoint less conservative than the value shown in the Allowable Values column of Table 3.3-4.	Bases	3
3.3.5	LA.2	3.3.2 Action b	Requirement to take action specified in Table 3.3-3 if an ESFAS instrument channel is inoperable.	Bases	3
3.3.5	LA.3	Table 3.3-3 Items I through VII	Information regarding ESFAS functions including the number of channels available and the number required for the function.	Bases	2
3.3.5	LA.4	Table 3.3-3 Action 13	Requirement to bypass or trip listed associated functional units if a channel process measurement circuit that affects multiple functional units is inoperable or in test.	Bases	3

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3.3.5	LA.4	Table 3.3-3 Action 14	Requirement to place all listed functional units affected by the bypassed/tripped channel into the bypassed/tripped condition.	Bases	3
3.3.5	LA.5	Table 3.3-3 Action 14	Statement that STARTUP and/or POWER OPERATION may continue until the performance of the next required CHANNEL FUNCTIONAL TEST. Subsequent startup and/or power operation may continue if one channel is restored to OPERABLE status and the provisions of Action 13 are satisfied.	Bases	3
3.3.5	LA.6	Table 3.3-4 Items I through VII	Trip setpoint column with specific data.	UFSAR	1
3.3.5	LA.7	Table 3.3-4 Note 2	States that the percent level specified in the table for the Steam Generator Level setpoints is the percent of the distance between the Steam Generator upper and lower level narrow range instrument nozzles.	UFSAR	1
3.3.5	LA.7	Table 3.3-4 Note 4	States that the percent level specified in the Table for the Steam Generator Level setpoints is the percent of the distance between the Steam Generator upper and lower level wide range instrument nozzles.	UFSAR	1
3.3.5	LA.8	Table 3.3-3 Action 13	Requirement that the desirability of maintaining bypassed inoperable channels be reviewed in accordance with Specification 6.5.1.6.	QA Program Description	3

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3.3.6	LA.1	Table 3.3-3	Information regarding ESFAS functions including the number of channels available and the number required for the function.	Bases	2
3.3.6	LA.2	Table 3.3-3 Note(c)	System configuration information for Initiation Logic and Manual Trip functions	Bases	2
3.3.6	LA.2	Table 3.3-3 Note (d)	Notation "The proper two out of four combination."	Bases	2
3.3.6	LA.3	Table 4.3-2 Note (3)	List of Actuation Devices that cannot be tested at power and a list of Actuation Devices that can be partially tested at power.	UFSAR	3
3.3.7	LA.1	Table 3.3-3	Information about the Loss of Power number of Channels to Trip and the Minimum Channels Operable.	Bases	2
3.3.7	LA.2	3.3.2	Requirement that the Loss of Voltage Function and the Degraded Voltage Function have their trip setpoints set consistent with the Trip Setpoint column of Table 3.3-4.	Bases	3
3.3.7	LA.2	3.3.2 Action A	Requirement that the Loss of Voltage Function and the Degraded Voltage Function have their trip setpoints set consistent with the Trip Setpoint column of Table 3.3-4.	Bases	3
3.3.7	LA.2	Table 3.3-4	Specification of Trip Value voltages for Loss of Power.	UFSAR	1
3.3.7	LA.3	3.3.2 Action A	Requirement that an instrumentation channel be declared inoperable if its setpoint is less conservative than the value shown in the Allowable Values column of Table 3.3-4.	Bases	3

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3.3.7	LA.4	Figure 3.3-1	Figure contains information relevant to OPERABILITY determination of the Loss of Voltage relays that is also included in text form in ITS 3.3.7.3.	UFSAR	1
3.3.7	LA.5	Table 3.3-3	Footnote (e) contains clarification that there are four separate loss of voltage relays and four separate degraded voltage relays per channel.	Bases	2
3.3.8	LA.1	3.3.3.1	Deleting the phrase "...with their alarm/trip setpoints within the specified limits."	Bases	3
3.3.8	LA.2	Table 3.3-6 1.D	Details of the measurement range for each radiation monitor (RU-37 and RU-38).	UFSAR	1
3.3.9	LA.1	3.3.3.1	Deleting the phrase "...with their alarm/trip setpoints within the specified limits."	Bases	3
3.3.9	LA.2	Table 3.3-6 2.B	Details of the measurement range for each radiation monitor (RU-29 & RU-30).	UFSAR	1
3.3.9	LA.3	3.3.2	Requirement that trip setpoints be set consistent with the values shown in Table 3.3-4.	Bases	3
3.3.9	LA.4	3.3.2 Action A	Actions for an ESFAS instrumentation channel trip setpoint less conservative than the value specified	Bases	3
3.3.9	LA.5	Table 3.3-3 IX	Information to show the relationship between the total number of ESFAS function channels available, minimum required OPERABLE and minimum for ESFAS actuation (CREF).	Bases	2

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3.3.9	LA.6	Table 3.3-4 IX	Specification of Allowable Values for digital instrumentation that is not subject to the drift factors inherent to analog instrumentation (CREF).	Bases	1
3.3.10	LA.1	Table 3.3-10	Specification of the minimum number of channels operable for each Function	Bases	2
3.3.10	LA.2	4.6.4.1	Details for the calibration of the Containment Hydrogen monitor.	Bases	3
3.3.10	LA.3	3.3.3	Requirement that radiation monitoring instrumentation channels shown in Table 3.3-6 have alarm/trip setpoints within the specified limits.	Bases	1
3.3.10	LA.4	Table 3.3-6 1.C	Lists of the Alarm/Trip setpoints and measurement range for each Radiation Monitor (RU-148 & RU-149).	UFSAR	1
3.3.11	LA.1	Table 3.3.9.A	Readout location information for the Remote Shutdown Instrumentation.	UFSAR	2
3.3.12	LA.1	3.1.2.7 Action a.1	Information regarding the methods to be used to determine RCS boron concentration.	Bases	3
3.3.12	LA.1	3.1.2.7 Action b.1	Information regarding the methods to be used to determine RCS boron concentration.	Bases	3
3.3.12	LA.1	3.1.2.7 Note **	Information regarding where the RCS boron sample should be obtained.	Bases	3
3.3.12	LA.2	3.1.2.7 Action b.1	Information regarding the methods to be used to determine RCS boron concentration.	Bases	3

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3.4.1	None	N/A	N/A	N/A	N/A
3.4.2	None	N/A	N/A	N/A	N/A
3.4.3	LA.1	4.4.8.1.2	Reactor Vessel material irradiation Surveillance Requirements	TRM	1
3.4.3	LA.1	Table 4.4-5	Reactor Vessel Material Surveillance Program - Withdrawal Schedule	TRM	3
3.4.4	LA.1	3.4.1.1	The phrase "...and both reactor coolant pumps in each loop..."	Bases	3
3.4.4	LA.2	4.4.1.1	The phrase "...and circulating reactor coolant.."	Bases	3
3.4.5	LA.1	3.4.1.2.a	Specifies RCP loop numbers.	Bases	2
3.4.5	LA.1	3.4.1.2.b	Specifies components making up a loop and that one RCP per loop is required.	Bases	2
3.4.5	LA.2	4.4.1.2.2	Requires that the reactor coolant loops be "circulating reactor coolant."	Bases	3
3.4.5	LA.3	4.4.1.2.3	Specifies that "indicated wide range" level is to be used for verification of SG level. The word "indicated" is removed and the remainder of the phrase moved.	Bases	3
3.4.6	LA.1	Not Used	N/A	N/A	N/A
3.4.6	LA.2	4.4.1.3.3	Shutdown cooling minimum flow rate requirements	Bases	1
3.4.6	LA.2	4.4.1.3.3	Requirement that at least one reactor coolant loop or SDC train be "circulating reactor coolant."	Bases	3

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3.4.6	LA.3	3.4.1.3	Specifies reactor coolant loop and SDC train numbers	UFSAR	2
3.4.6	LA.3	3.4.1.3 (a. through d.)	Specifies components making up a reactor coolant loop	Bases	2
3.4.6	LA.4	3.4.1.3 Footnote **	Guidance in determining SG water temperature.	Bases	3
3.4.6	LA.5	4.4.1.3.2	Specifies that "indicated wide range" level is to be used for verification of SG level. The word "indicated" is deleted and the remainder of the information is relocated	Bases	3
3.4.7	LA.1	Not Used	N/A	N/A	N/A
3.4.7	LA.2	4.4.1.4.1.2	Minimum flowrate that SDC must equal or exceed.	Bases	1
3.4.7	LA.2	4.4.1.4.1.2	Statement that at least one SDC train be verified "circulating reactor coolant."	Bases	3
3.4.7	LA.3	3.4.1.4.1.b	Specifies that "indicated wide range" level is to be used for verification of SG level. The word "indicated" is deleted and the remainder of the information is relocated	Bases	3
3.4.7	LA.4	3.4.1.4.1 Footnote ##	Guidance in determining SG water temperature.	Bases	3
3.4.8	LA.1	4.4.1.4.2	Minimum flowrate that SDC must equal or exceed.	Bases	1
3.4.8	LA.1	4.4.1.4.2	Requirement that at least one SDC train be verified "circulating reactor coolant."	Bases	3

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3.4.9	LA.1	4.4.3.1.3	Tests the emergency power supply for the class 1E pressurizer heaters.	TRM	2
3.4.9	LA.2	3.4.3.1	Clarification that pressurizer level for the LCO should be "steady state" and not transitory due to plant evolutions.	Bases	3
3.4.9	LA.3	3.4.3.1	Specifies "indicated level" when defining pressurizer OPERABILITY as it pertains to pressurizer level. This information, less the word "indicated" is moved to ITS Bases.	Bases	3
3.4.10	LA.1	3.4.2.2 Footnote *	Contains maintenance information concerning the approved method for setting pressurizer safety valve lift setpoints.	Bases	3
3.4.10	LA.2	Not Used	N/A	N/A	N/A
3.4.11	LA.1	3.4.2.1 Footnote *	Contains maintenance information concerning the approved method for setting pressurizer safety valve lift setpoints.	Bases	3
3.4.12	LA.1	4.4.10.a	Requirement to verify that all manual isolation valves in the pressurizer vent path are locked in the open position.	TRM	3
3.4.12	LA.2	4.4.10.b	Details that the method for cycling each vent valve be "from the control room."	Bases	3
3.4.12	LA.3	4.4.10	Requires that vent path Surveillances be performed "when in MODES 5 or 6."	Bases	3
3.4.13	LA.1	Not Used	N/A	N/A	N/A

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3.4.13	LA.2	3.4.8.3 Action b	Requirement to reduce cold leg temperature to less than 200 degrees F with one Shutdown Cooling System suction line relief valve not OPERABLE.	Bases	3
3.4.13	LA.2	3.4.8.3 Action c	Requirement to reduce cold leg temperature to less than 200 degrees F with one Shutdown Cooling System suction line relief valve not OPERABLE.	Bases	3
3.4.13	LA.3	4.4.8.3.2	Requirement that Shutdown Cooling System suction line relief valves be verified OPERABLE every 18 months	Inservice Testing Program	3
3.4.14	LA.1	4.4.5.2.1.b	Requires monitoring the containment sump inventory and discharge every 12 hours	TRM	3
3.4.14	LA.1	4.4.5.2.1.d	Requires that the reactor head flange leakoff System be monitored every 24 hours	TRM	3
3.4.15	LA.1	3.4.5.2 Footnote *(and reference)	Contains a partial list of specific PIVs excluded from requirements.	Bases	3
3.4.15	LA.1	Table 3.4-1	Reactor Coolant System Pressure Isolation Valves.	UFSAR	1
3.4.15	LA.2	4.4.5.2.2.c	Explicitly requires a demonstration of OPERABILITY following maintenance, repair or replacement work.	Bases	3
3.4.15	LA.3	4.7.11.b	Requires that performance of the Surveillance is to be accomplished during shutdown.	Bases	3

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ITS Number	LA Number	CTS Number	Description	Destination Document	Type of Change
3.4.15	LA.4	4.4.5.2.2.e	Requires testing PIVs within 72 hours following a system response to an Engineered Safety Feature Actuation Signal (ESFAS).	TRM	3
3.4.16	LA.1	Table 3.3-6	Particulate and gaseous radioactivity monitor (RU-1) alarm setpoint.	Bases	1
3.4.16	LA.1	Table 3.3-6	Particulate and gaseous radioactivity monitor (RU-1) measurement range.	UFSAR	1
3.4.16	LA.2	Table 3.3-6 Action 27.3	Requires preparation and submittal of a special report to the commission within 30 days outlining the action taken, cause of the inoperability, and the plans and schedule for restoring the system to OPERABLE status.	TRM	3
3.4.17	LA.1	Table 4.4-4 Item 4.b	Statement that one sample is sufficient if the plant has gone through a SHUTDOWN or if transient is complete in 6 hours.	Bases	3
3.5.1	LA.1	3.5.1.a	Requirement that the isolation valves be key-locked.	Bases	3
3.5.1	LA.2	3.5.1.b	Reference to borated water volume in "cubic feet."	Bases	1
3.5.1	LA.3	3.5.1.e	Specific requirements for the operation of the SIT nitrogen vent valves.	TRM	3
3.5.1	LA.3	3.5.1.f	Specific requirements for the operation of the SIT nitrogen vent valves.	TRM	3
3.5.1	LA.3	3.5.1 Note **	Specific requirements for the operation of the SIT nitrogen vent valves.	TRM	3

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ITS Number	LA Number	CTS Number	Description	Destination Document	Type of Change
3.5.1	LA.3	4.5.1.a.2	Specific requirements for the operation of the SIT nitrogen vent valves.	TRM	3
3.5.1	LA.3	4.5.1.f	Specific requirements for the operation of the SIT nitrogen vent valves.	TRM	3
3.5.1	LA.3	4.5.1.g	Specific requirements for the operation of the SIT nitrogen vent valves.	TRM	3
3.5.1	LA.4	4.5.1.e	Requires that the RCS-SIT differential pressure alarm OPERABILITY be verified at least once per 18 months.	TRM	3
3.5.1	LA.5	4.5.1.d	Requires verification at least once per 18 months that each SIT isolation valve opens automatically when an actual or simulated RCS pressure signal exceeds 515 psia and upon receipt of a SIAS test signal.	TRM	3
3.5.2	LA.1	3.5.1.a	Requirement that the isolation valve be key-locked.	Bases	3
3.5.2	LA.2	3.5.1 Note	Reference to borated water volume in "cubic feet."	Bases	1
3.5.2	LA.3	3.5.1.e	Requirement that the SIT nitrogen vent valves be closed with power removed.	TRM	3
3.5.2	LA.3	3.5.1.f	Requirement that the SIT nitrogen vent valves be capable of being operated upon restoration of power.	TRM	3
3.5.2	LA.3	3.5.1 Note **	Allowance to cycle the SIT nitrogen vent valves as necessary to maintain the required cover pressure.	TRM	3

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3.5.2	LA.3	4.5.1.a.2	Requirement that the SIT nitrogen vent valves be closed.	TRM	3
3.5.2	LA.3	4.5.1.f	Requirement to verify that SIT nitrogen vent valves can be opened at 18 month intervals.	TRM	3
3.5.2	LA.3	4.5.1.g	Requirement to verify that power is removed from the SIT nitrogen vent valves.	TRM	3
3.5.2	LA.4	4.5.1.e	Requires that the RCS-SIT differential pressure alarm OPERABILITY be verified at least once per 18 months and specifies the method.	TRM	3
3.5.2	LA.5	4.5.1.d	Requires 18 month interval verification that the SIT isolation valve opens automatically when an actual or simulated RCS pressure signal exceeds 515 psia and upon receipt of a SIAS test signal	TRM	3
3.5.3	LA.1	3.5.2 (a. through c.)	List of the specific ECCS components that comprise an ECCS subsystem/train.	Bases	2
3.5.3	LA.2	3.5.2 Action b	Requires that in the event the ECCS is actuated and injects water into the RCS, a Special Report be submitted to the NRC.	TRM	4
3.5.3	LA.3	4.5.2.c	Requires that a visual inspection of the containment be made prior to establishing containment integrity and when entries are made after integrity has been established.	TRM	3
3.5.3	LA.4	4.5.2.b.2	Method of verification that the ECCS piping is full of water (by venting the accessible high points).	Bases	3

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3.5.3	LA.5	4.5.2.g.1	Requires position verification of each ECCS throttle valve position stop following completion of each valve stroking operation or maintenance of the valve when the ECCS subsystems are required to be OPERABLE.	TRM	3
3.5.3	LA.6	4.5.2.h	Requires that an ECCS flow balance test be performed following completion of modifications to the ECCS subsystems that alter flow characteristics.	TRM	3
3.5.3	LA.7	4.5.2.f(1. and 2.)	Provides flowrate and developed head details of functional testing for the ECCS (HPSI and LPSI) pumps.	Inservice Testing Program	1
3.5.3	LA.8	4.5.2.e.3	Lists the specific ECCS and Containment Spray valves that are required to be actuated.	Bases	2
3.5.3	LA.9	3.7.11	Provides the LCO, Applicability and Action requirements for the Shutdown Cooling System.	TRM	3
3.5.3	LA.9	4.7.11.a	Requires that the Shutdown Cooling System be surveilled at 18 month intervals to demonstrate the specified flowpath.	TRM	3
3.5.4	LA.1	3.5.3 Action b	Requires that in the event the ECCS is actuated and injects water into the RCS that a Special Report be submitted to the NRC.	TRM	3
3.5.4	LA.2	3.5.3.b	Requires that ECCS subsystems contain an OPERABLE flow path with details of the path specified.	Bases	3
3.5.5	None	N/A	N/A	N/A	N/A

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3.5.6	LA.1	4.5.2.d.3	Provides specific details regarding sample size, volume of borated water, etc. for verification that a sample from a TCP basket raises the pH of the mixed solution within time constraints.	Bases	1
3.6.1	LA.1	4.6.1.1.c	Requirement to test Type B penetrations.	Containment Leakage Rate Testing Program	3
3.6.2	LA.1	3.6.1.3.a	Operational requirements for the air lock doors (closure requirements).	Bases	3
3.6.3	LA.1	Not Used	N/A	N/A	N/A
3.6.3	LA.2	4.6.1.7.2	Details of purge valve leakage rate acceptance criteria.	Containment Leakage Rate Testing Program	1
3.6.3	LA.2	4.6.1.7.3	Details of purge valve leakage rate acceptance criteria.	Containment Leakage Rate Testing Program	1
3.6.3	LA.3	4.6.3.5	Statement that valves secured in their actuated position are considered operable pursuant to the specification.	Bases	3
3.6.3	LA.3	4.6.3.5 Note *** (*)	Clarification that "secured" means "Locked, sealed, or otherwise prevented from unintentional operation."	Bases	3
3.6.3	LA.4	4.6.3.1	Requirement that each containment isolation valve be demonstrated OPERABLE after maintenance.	Bases	3
3.6.4	None	N/A	N/A	N/A	N/A

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3.6.5	LA.1	4.6.1.5	Specifies locations where containment temperatures are to be measured for use in determining the average containment air temperature.	Bases	3
3.6.6	LA.1	3.6.2.1	Functional description of the performance of an OPERABLE containment spray system.	Bases	2
3.6.6	LA.2	4.6.2.1.a	Details of ESFAS test signals and the flow paths resulting from the correct alignment of valves.	Bases	3
3.6.6	LA.2	4.6.2.1.d.1	Details of ESFAS test signals and the automatic valve actuations that result.	Bases	3
3.6.6	LA.2	4.6.2.1.d.3	Details of ESFAS test signals used in spray pump start verification.	Bases	3
3.6.6	LA.3	4.6.1.2.e	Specifies testing details of the spray nozzles for obstructions (by blowing air or smoke through them).	Bases	3
3.6.6	LA.4	4.6.2.1.b	Details of functional testing for the containment spray pumps.	Inservice Testing Program	1
3.6.7	LA.1	4.6.4.2.a.2	Details for the performance of hydrogen recombiner system functional testing.	Bases	1
3.6.7	LA.1	4.6.4.2.b	Specific reference to recombiner instrumentation (in regard to CHANNEL CALIBRATION) and functional test requirements.	Bases	3
3.6.7	LA.2	Not Used	N/A	N/A	N/A

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3.7.1	LA.1	Table 3.7-1	Information on the minimum rated capacity of the MSSVs.	UFSAR	1
3.7.1	LA.1	Table 3.7-1 Note **	Clarification of MSIV capacity rating.	UFSAR	1
3.7.1	LA.2	Table 3.7-1 Note *	Details of lift set pressure testing for MSSVs	Bases	1
3.7.2	None	N/A	N/A	N/A	N/A
3.7.3	LA.1	3.6.3 Action 1.b	Details of the means of isolation.	Bases	3
3.7.3	LA.2	4.6.3.5	Statement regarding valve operability considerations.	Bases	3
3.7.3	LA.2	3.6.3 Note ***	Clarification that "secured" means "Locked, sealed, or otherwise prevented from unintentional operation."	Bases	3
3.7.4	LA.1	4.7.1.6.a	Requirement to verify the pressure in the nitrogen accumulator tank to a specific value periodically.	TRM	3
3.7.5	LA.1	3.7.1.2.a	Support requirements for steam generator auxiliary feedwater pumps (powered from separate emergency busses).	Bases	3
3.7.5	LA.1	3.7.1.2.b	Support requirements for steam generator auxiliary feedwater pump (powered from steam supply system).	Bases	3
3.7.5	LA.2	4.7.1.2.a.2	Requirement to verify the position of locked, sealed or secured manual valves in CST suction lines to AFW pumps and manual discharge valve of each pump.	TRM	3

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ITS Number	LA Number	CTS Number	Description	Destination Document	Type of Change
3.7.5	LA.3	4.7.1.2.d	Details of flow path alignment and flow verification testing from CST to steam generators.	Bases	3
3.7.6	LA.1	3.7.1.3 Action b	Details of the verifications required to demonstrate OPERABILITY of the reactor makeup water tank flowpath to the essential auxiliary feedwater pumps (backup supply).	Bases	3
3.7.6	LA.1	4.7.1.3.2 (a. and b.)	Backup supply verification details.	Bases	2
3.7.7	LA.1	4.7.3.d	Requirement to periodically verify locked, sealed or secured valves to be in their correct position.	TRM	3
3.7.8	LA.1	4.7.4.2	Requirement to periodically verify locked, sealed or secured valves to be in their correct position.	TRM	3
3.7.9	None	N/A	N/A	N/A	N/A
3.7.10	LA.1	3.7.6 Action b	Completion times to determine OPERABILITY	Safety Functions Determination Program	1
3.7.10	LA.2	4.7.6.2	Requirement to periodically verify locked, sealed or secured valves to be in their correct position.	TRM	3
3.7.11	LA.1	4.7.1.1.d.2	Design details of the CREFS/SIAS actuation flowpath.	Bases	1
3.7.12	LA.1	3.7.12	Verification requirement that the control room air temperature is less than or equal to 80° F (LCO, Action and Surveillance Requirement).	TRM	3

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ITS Number	LA Number	CTS Number	Description	Destination Document	Type of Change
3.7.13	LA.1	4.7.8.b	Interval and conditional requirement to demonstrate OPERABILITY of the ESF pump room air exhaust cleanup system.	Ventilation Filter Testing Program	3
3.7.14	LA.1	3.9.11 Action	Requirement to suspend "... crane operations with loads" in the fuel storage areas.	TRM	3
3.7.15	None	N/A	N/A	N/A	N/A
3.7.16	LA.1	Table 4.7-1	Requirement to perform a gross activity determination periodically.	TRM	3
3.7.17	None	N/A	N/A	N/A	N/A
3.8.1	LA.1	Not Used	N/A	N/A	N/A
3.8.1	LA.2	Not Used	N/A	N/A	N/A
3.8.1	LA.3	Not Used	N/A	N/A	N/A
3.8.1	LA.4	Not Used	N/A	N/A	N/A
3.8.1	LA.5	Not Used	N/A	N/A	N/A
3.8.1	LA.6	3.8.1.1 Action f	Detailed information about the minimum voltages required for each unit and the number of startup transformers in service for the electrical distribution system input voltages to be within their limits.	Bases	1
3.8.1	LA.6	3.8.1.1 Action g	Detailed information about the minimum voltages required for each unit and the number of startup transformers in service for the electrical distribution system input voltages to be within their limits.	Bases	1

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ITS Number	LA Number	CTS Number	Description	Destination Document	Type of Change
3.8.2	LA.1	3.8.1.2 Action 4	Requirement to suspend crane operation with loads over the fuel storage pool with less than the minimum required AC electrical power sources OPERABLE.	TRM	3
3.8.3	LA.1	Not Used	Not Used	Not Used	N/A
3.8.4	LA.1	4.8.2.1.f	Detailed information describing what constitutes a degraded battery.	Bases	3
3.8.4	LA.2	Table 3.8-1	Table names the components that comprise a DC train.	Bases	2
3.8.4	LA.3	Not Used	N/A	N/A	N/A
3.8.5	LA.1	Not Used	N/A	N/A	N/A
3.8.6	LA.1	Not Used	N/A	N/A	N/A
3.8.7	LA.1	3.8.3.1	Detailed information that describes what buses and components constitute an OPERABLE Electrical Distribution System.	Bases	2
3.8.7	LA.1	4.8.3.1	Reference to the "required manner" for energizing specified busses.	Bases	3
3.8.8	LA.1	Not Used	N/A	N/A	N/A
3.8.9	LA.1	3.8.3.1	Detailed information that describes what buses and combination of buses and components constitute an OPERABLE electrical distribution subsystem.	Bases	2
3.8.9	LA.1	4.8.3.1	Reference to the "required manner" for energizing specified busses.	Bases	3

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ITS Number	LA Number	CTS Number	Description	Destination Document	Type of Change
3.8.9	LA.2	Not Used	N/A	N/A	N/A
3.8.10	LA.1	3.8.3.2	Detailed information that describes what buses and combination of buses and components constitute an OPERABLE electrical distribution subsystem.	Bases	2
3.8.10	LA.1	4.8.3.2	Reference to the "required manner" for energizing specified busses.	Bases	3
3.9.1	LA.1	3.9.1 Action	Details regarding boration flowrate and solution concentration.	Bases	1
3.9.1	LA.2	4.9.1.1	Requirement that the boron concentration be determined to be within the limits specified in the COLR prior to unbolting or removing the reactor pressure vessel head, and prior to withdrawal of any full length CEA.	TRM	3
3.9.2	LA.1	3.9.2	Details of startup channel neutron flux monitoring systems.	Bases	2
3.9.3	LA.1	4.9.4	Requirements for containment building penetrations to be verified in the required status prior to entering the Applicability.	TRM	3
3.9.4	LA.1	3.9.8.1 Note *	Limitation on the reasons why shutdown cooling may be removed from operation for up to one hour per eight hour period.	Bases	3
3.9.4	LA.2	4.9.8.1	Specific value for shutdown cooling loop flowrate.	Bases	1
3.9.5	LA.1	4.9.8.2	Specific value for shutdown cooling loop flowrate.	Bases	1

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ITS Number	LA Number	CTS Number	Description	Destination Document	Type of Change
3.9.5	LA.2	3.9.8.2 Note *	Limitation on the reasons why shutdown cooling may be removed from operation for up to one hour per eight hour period.	Bases	3
3.9.6	None	N/A	N/A	N/A	N/A
3.9.7	None	N/A	N/A	N/A	N/A
4.0	None	N/A	N/A	N/A	N/A
5.0	LA.1	6.1.2	Reference to Table 6.2-1	UFSAR	2
5.0	LA.1	6.2.2.a	Reference to Table 6.2-1.	UFSAR	2
5.0	LA.1	Table 6.2-1	Minimum shift crew requirements and limitations on unmanned crew positions.	UFSAR	2
5.0	LA.2	6.2.2.d	Requirement that all Core alterations be supervised by a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling.	UFSAR	3
5.0	LA.3	6.2.2.e	Site Fire Team Requirements.	UFSAR	2
5.0	LA.3	6.2.2.e Note *	Reference to Site Fire Team composition.	UFSAR	2
5.0	LA.4	6.2.3 (and Note *)	Requirements for Independent Safety Engineering Department (ISE).	QA Program Description	2
5.0	LA.5	6.4.1	Training Requirements.	UFSAR	2
5.0	LA.6	6.5.1	Requirements for the Plant Review Board (PRB).	QA Program Description	2

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ITS Number	LA Number	CTS Number	Description	Destination Document	Type of Change
5.0	LA.6	6.5.2 (6.5.2.1 through 6.5.2.4 and 6.5.2.8)	Requirements for Technical Review and Control (except for modification approval requirements by Department Leader, Operations).	QA Program Description	2
5.0	LA.6	6.5.3	Requirements for the Offsite Safety Review Committee (OSRC)	QA Program Description	2
5.0	LA.7	6.6	Specific actions for reportable events.	UFSAR	3
5.0	LA.8	6.8.1.g Note (1)	Requirement for PRB approval of modifications to CPC addressable constants.	QA Program Description	2
5.0	LA.9	6.8.1.j	Requirement to use the guidance of Regulatory Guide 1.21 Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975.	QA Program Description	2
5.0	LA.10	6.8.1.n (and NOTE)	Settlement Monitoring Program Implementation.	UFSAR	2
5.0	LA.10	6.8.1.o	CEA Reactivity Integrity Program Implementation.	UFSAR	2
5.0	LA.10	6.8.1.p	Fuel Assembly Surveillance Program Implementation.	UFSAR	2
5.0	LA.11	6.8.2	Procedure review and approval requirements.	QA Program Description	2
5.0	LA.11	6.8.3	Requirements for temporary changes to procedures.	QA Program Description	2
5.0	LA.12	6.8.4	Requires programs "be audited under the cognizance of the OSRC at least once per 24 months."	QA Program Description	2

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ITS Number	LA Number	CTS Number	Description	Destination Document	Type of Change
5.0	LA.13	6.8.4.b	Requires that a program be established for In-Plant Radiation Monitoring.	UFSAR	2
5.0	LA.13	6.8.4.d	Requires that a program be established for Backup Method for Determining Subcooling Margin.	UFSAR	2
5.0	LA.13	6.8.4.f	Requires that a program be established for Spray Pond Monitoring.	UFSAR	2
5.0	LA.14	6.8.4.h	Provides requirements for the Radiological Environmental Monitoring Program.	TRM	2
5.0	LA.14	6.13	Provides requirements for the Process Control Program.	QA Program Description	3
5.0	LA.14	6.15	Provides requirements for Major Changes to Radioactive Liquid, Gaseous and Solid Waste Treatment Systems.	TRM	2
5.0	LA.15	6.9.1.1	Details associated with "Startup Report" (initiating events).	UFSAR	3
5.0	LA.15	6.9.1.2	Details associated with "Startup Report" (address).	UFSAR	3
5.0	LA.15	6.9.1.3	Details associated with "Startup Report" (submittal).	UFSAR	3
5.0	LA.16	6.9.1.5	Requirements for the information included in the Annual Report.	TRM	2
5.0	LA.17	6.9.3	Requirements for reporting of Fire Protection Program violations.	UFSAR	2

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ITS Number	LA Number	CTS Number	Description	Destination Document	Type of Change
5.0	LA.18	6.10	Requirements for record retention.	QA Program Description	2
5.0	LA.18	6.14.a	References retention requirements of 6.10.2.q.	QA Program Description	2
5.0	LA.19	6.11	Details for the Radiation Protection Program.	UFSAR	2
5.0	LA.20	6.14.b	Requires PRB review and acceptance of changes to the ODCM prior to the changes becoming effective.	QA Program Description	2
5.0	LA.21	4.0.5.a	References specific 10CFR50 and ASME Code requirements governing performance of the Inservice inspection and testing.	In Service Inspection/ In Service Testing Program	2
5.0	LA.21	4.0.5.b	References Inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable addenda.	In Service Inspection/ In Service Testing Program	2
5.0	LA.21	4.0.5.c	Reference to inspection.	In Service Inspection/ In Service Testing Program	2
5.0	LA.22	4.5.2.e.4	Requires verification that the total measured leakage from ECCS piping and components is less than 1 g.p.m. when pressurized to at least 40 psig.	TRM	3

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ITS Number	LA Number	CTS Number	Description	Destination Document	Type of Change
5.0	LA.23	3.6.1.6	Requires that the structural integrity of the containment vessel be maintained in MODES 1 through 4 and provides specific actions if it is below the acceptance criteria.	TRM	3
5.0	LA.24	4.6.1.6.1	Provides detailed surveillance and reporting requirements for the structural integrity of the containment vessel.	Pre-Stressed Concrete Containment Tendon Surveillance Program	3
5.0	LA.24	4.6.1.6.2	Addresses how the structural integrity of the containment vessel shall be demonstrated.	Pre-Stressed Concrete Containment Tendon Surveillance Program	3
5.0	LA.24	4.6.1.6.3	Addresses visual inspection of structural integrity components of the containment vessel.	Pre-Stressed Concrete Containment Tendon Surveillance Program	3
5.0	LA.24	4.6.1.6.4	Addresses exterior surface inspection of the containment vessel.	Pre-Stressed Concrete Containment Tendon Surveillance Program	3

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ITS Number	LA Number	CTS Number	Description	Destination Document	Type of Change
5.0	LA.24	4.6.1.6.5	Addresses reports of any abnormal degradation of structural integrity of the containment vessel.	Pre-Stressed Concrete Containment Tendon Surveillance Program	3
5.0	LA.24	Table 4.6-1	Table of first year tendon surveillances.	Pre-Stressed Concrete Containment Tendon Surveillance Program	3
5.0	LA.24	Table 4.6-2	Table of lift-off force for first year U-tendons.	Pre-Stressed Concrete Containment Tendon Surveillance Program	3
5.0	LA.25	4.7.7	Details of implementing the Ventilation Filter Testing Program for the ESF Pump Room Air Exhaust Cleanup System (Broad Reference).	Ventilation Filter Testing Program	3
5.0	LA.25	4.7.8	Details of implementing the Ventilation Filter Testing Program for the Fuel Building Essential Ventilation System (Broad Reference).	Ventilation Filter Testing Program	3
5.0	LA.26	3.11.1	Details of the method for implementing the Liquid Holdup Tanks including LCO, Applicability and "Action a."	TRM	3

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ITS Number	LA Number	CTS Number	Description	Destination Document	Type of Change
5.0	LA.26	4.11.1	Details of the method for implementing the Liquid Holdup Tanks (sample and analysis frequency requirements).	TRM	3
5.0	LA.26	3.11.3	Details of the method for implementing the Gas Storage Tanks including LCO limit, Applicability and "Action a."	TRM	3
5.0	LA.26	4.11.3	Surveillance interval and activity limits for the Gas Storage Tanks.	TRM	3
5.0	LA.27	3.11.2	Maximum limit for the oxygen concentration in the waste gas holdup system, including Applicability and Action requirements.	TRM	1
5.0	LA.27	4.11.2	Surveillance requirements for oxygen in the waste gas holdup system.	TRM	3
5.0	LA.28	4.8.1.3.1.2	Requires that the diesel fuel storage tanks be sampled in accordance with ASTN-D4176-82.	UFSAR	3
5.0	LA.29	3.7.7	Reference to ANSI N509-1980 in the Surveillance Requirements.	UFSAR	2
5.0	LA.29	3.7.8	Reference to ANSI N509-1980 in the Surveillance Requirements.	UFSAR	2
5.0	LA.30	6.2.2.b	Requirement for number of licensed reactor operators in the control room.	UFSAR	2
5.0	LA.31	6.2.2.1.b	Specific working hours for plant staff.	UFSAR	2

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## Table of PVNGS Relocated Details (LA)

The following summarizes the methods of control for various documents that will receive details that are relocated from the current technical specifications to the improved technical specifications.

<u>Document</u>	<u>Method for Control</u>
Containment Leakage Rate Testing Program	ITS 5.5 10CFR50 Appendix J. 10CFR50.59
Inservice Testing Program	ITS 5.5 10CFR50.55a 10CFR50.59
Offsite Dose Control Manual (ODCM)	ITS 5.5 10CFR50.59
Pre-Stressed Concrete Containment Tendon Surveillance Program	ITS 5.5 10CFR50.59
QA Program Description	10CFR50.54
Safety Function Determination Program	ITS 5.5 10CFR50.59
Technical Requirements Manual (TRM)	10CFR50.59
Technical Specifications Bases (Bases)	ITS 5.5 10CFR50.59
Updated Final Safety Analysis Report (UFSAR)	10CFR50.59
Ventilation Filter Testing Program	ITS 5.5 10CFR50.59



Table of PVNGS Less Restrictive Changes (L)

Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
1.0 L.1	Combines analog and bistable channel requirements instead of maintaining them as separate definitions which allows the bistable channel test signal to be injected "as close to the sensor as practicable."	Definitions 1.6	Definition: CHANNEL FUNCTIONAL TEST	None	unique
1.0 L.2	Relaxes the definition of CORE ALTERATION to specify the movement or manipulation of fuel and not "any component within the reactor pressure vessel."	Definitions 1.9	Definition: CORE ALTERATIONS	None	unique
1.0 L.3	Not Used	N/A	N/A	N/A	
1.0 L.4	Deletes the statement in CTS about CHANNEL FUNCTIONAL TEST that states "The CHANNEL FUNCTIONAL TEST shall include adjustments, as necessary, of the alarm, interlock and/or trip setpoints such that the setpoints are within the required range and accuracy."	Definitions 1.6	Definition: CHANNEL FUNCTIONAL TEST	None	unique
1.0 L.5	Allows for an "actual" or "simulated" signal to be used during CHANNEL FUNCTIONAL TESTING.	Definitions 1.6	Definition: CHANNEL FUNCTIONAL TEST	None	unique
1.0 L.6	Allows CHANNEL FUNCTIONAL TEST to be performed by any series of sequential, overlapping or total steps to all equipment covered by this definition.	Definitions 1.6	Definition: CHANNEL FUNCTIONAL TEST	None	unique

Categories:

I CTS LCO Applicability Changes

II CTS Surveillance Frequency Changes

III CTS LCO Revised to Address Train Configurations

IV CTS Allowed Outage Time Extensions from 24 to 72 Hours

V CTS Action Requirements for Exiting LCOs are Changed

VI CTS Surveillance Acceptance Criteria Are Changed

VII Other CTS Allowed Outage Time Extensions

VIII Elimination of CTS Reporting Requirements

IX Relaxation of LCO Requirements



Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
	Allows ENGINEERED SAFETY FEATURES RESPONSE TIME to be performed by any series of sequential, overlapping or total steps to all equipment covered by this definition.	Definitions 1.12	Definition: ENGINEERED SAFETY FEATURES RESPONSE TIME	None	unique
	Allows REACTOR PROTECTION SYSTEM RESPONSE TIME to be performed by any series of sequential, overlapping or total steps to all equipment covered by this definitions.	Definitions 1.27	Definition: REACTOR PROTECTION SYSTEM RESPONSE TIME	None	unique
1.0 L.7	Deletes the requirement for components tested under STAGGERED TEST BASIS to be performed in equal subintervals.	Definitions 1.33	Definition: STAGGERED TEST BASIS	None	unique
1.0 L.8	Relaxes the electrical power requirement under the definition of OPERABLE to permit the source to be either "normal" or "emergency" power available.	Definitions 1.19	Definition: OPERABLE	None	unique
2.0 None	None	N/A	N/A	N/A	
3.0 L.1	Adds LCO 3.0.6 to clarify the application of Required Actions for supported systems which are inoperable due to an inoperable support system. Requires only the support system's Actions to be entered if the support system's LCOs are not met.	LCO Applicability 3.0.1	LCO Applicability 3.0.2	None	unique

Categories:

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IX Relaxation of LCO Requirements





Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.0 L.2	Permits MODE changes when LCO 3.0.4 and SR 4.0.4 are not met while in MODES and conditions other than MODE 1, 2, 3 and 4.	LCO Applicability 3.0.4	LCO Applicability 3.0.4	I	
	Permits MODE changes when LCO 3.0.4 and SR 4.0.4 are not met while in MODES and conditions other than MODE 1, 2, 3 and 4.	SR Applicability 4.0.4	SR Applicability 3.0.4	I	
3.0 L.3	Provides clarification that for Required Action Completion Times which require periodic performance on a "once per ..." basis, the frequency extension of 1.25 times the specified interval applies to each performance after the initial performance.	SR Applicability 4.0.2	SR Applicability 3.0.2	II	
3.0 L.4	Allowance to delay entering the Required Action up to 24 hours upon discovery of a missed Surveillance in cases where the Action Completion Time is > 24 hours.	SR Applicability 4.0.3	SR Applicability 3.0.3	None	unique
3.0 L.5	Adds a new LCO Applicability requirement that allows inoperable equipment to be returned to service under administrative controls to perform testing required to demonstrate ITS OPERABILITY or the OPERABILITY of other equipment to be within limits.	LCO Applicability Section 3.0	LCO Applicability 3.0.4	None	unique
3.1.1 L.1	Requires that the reactivity worth of any CEAs not capable of being inserted be accounted for in the determination of SDM and therefore doesn't require a separate conditional Surveillance.	SR 4.1.1.1.3	LCO 3.1.1	None	unique

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IX Relaxation of LCO Requirements



Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.1.1 L.2	Eliminates the requirement to perform a core reactivity balance in MODES 3, 4, and 5, since the ITS does require that SDM be determined.	SR 4.1.1.1.2	LCO 3.1.1	I	
3.1.2 L.1	Reduces the MODE applicability of "Shutdown Margin - Reactor Trip Breakers Closed." by eliminating MODES 1 and 2. The SDM requirements are met through CEA alignment and insertion limits.	LCO 3.1.1.2	LCO 3.1.2	I	
3.1.2 L.2	Requires that the reactivity worth of any CEAs not capable of being inserted be accounted for in the determination of SDM and therefore doesn't require a separate conditional Surveillance.	SR 4.1.1.2.1a	LCO 3.1.2	None	unique
3.1.3 L.1	Allows 7 days to restore the overall core reactivity balance before requiring action to shutdown.	SR 4.1.1.2.4	LCO 3.1.2 Action A	VII	
3.1.3 L.2	Not Used	N/A	N/A	N/A	
3.1.3 L.3	Allows a 60 EFPD delay in performing the second overall core reactivity balance Surveillance following a refueling.	SR 4.1.1.2.4	SR 3.1.3.1	II	
3.1.4 L.1	Extends the period of time that the MTC must be determined to include a window of time within 7 EFPD prior to reaching the designated time.	SR 4.1.1.3.2.b	SR 3.1.4.2	VII	
3.1.5 L.1	Deletes the Action requirements to determine Shutdown Margin (SDM) when a CEA is inoperable.	LCO 3.1.3.1 Action a	LCO 3.1.5 Actions	None	unique

Categories:

I CTS LCO Applicability Changes

II CTS Surveillance Frequency Changes

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IX Relaxation of LCO Requirements



Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
		LCO 3.1.3.1 Action c	LCO 3.1.5 Actions	None	unique
3.1.5 L.2	Extends the time allowed to restore misaligned CEAs to within their specified alignment from one hour to two hours.	LCO 3.1.3.1 Action c.1	LCO 3.1.5 Actions A, B and C	VII	
3.1.5 L.3	Deletes the requirement to exercise part length CEAs for OPERABILITY determination.	SR 4.1.3.1.2	LCO 3.1.5	None	unique
3.1.5 L.4	Adds an option to allow continued operation with an inoperable position indicator as long as the insertion limits are met and the CEA group is verified to be fully inserted.	3.1.3.2	3.1.5	V	
3.1.6 L.1	Extends the Completion Time for the Required Action to restore shutdown CEAs to within limits from one hour to two hours.	LCO 3.1.3.5 Action a	LCO 3.1.6 Action B.1	VII	
3.1.6 L.2	Changes Applicability for LCO from MODE 1 and 2 to MODE 1 and 2 with any regulating CEA not fully inserted.	LCO 3.1.3.5	LCO 3.1.6	I	
3.1.7 L.1	Reduces the restriction on operation between the long term steady state insertion limits and the transient insertion limits to 14 EFPD per 365 EFPD.	LCO 3.1.3.6 Action a.1.b	LCO 3.1.7 Action C	None	unique
3.1.8 None	None	N/A	N/A	N/A	
3.1.9 None	None	N/A	N/A	N/A	

Categories:

I CTS LCO Applicability Changes	IV CTS Allowed Outage Time Extensions from 24 to 72 Hours	VII Other CTS Allowed Outage Time Extensions
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Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.1.10 L.1	Eliminates the requirement to comply with the Linear Heat Rate (LHR) Specification during performance of PHYSICS TESTS	LCO 3.10.2	LCO 3.1.10	None	unique
	Eliminates the Linear Heat Rate (LHR) Required Action during performance of PHYSICS TESTS	LCO 3.10.2 Action a	LCO 3.1.10	None	unique
	Deletes the Surveillance Requirements for LHR.	SR 4.10.2.2	LCO 3.1.10	None	unique
3.1.10 L.2	Deletion of the requirement to be in MODE 3 within 6 hours if physics testing is suspended.	3.10.2	3.1.10	V	
3.1.11 L.1	Eliminates the requirement to determine and verify that THERMAL POWER is maintained within the test power plateau.	SR 4.10.4.1	LCO 3.1.11	IX	
3.2.1 L.1	Eliminates the requirement to initiate corrective action within 15 minutes to restore the linear heat rate to within the LCO.	LCO 3.2.1 Action a.1	LCO 3.2.1 Action A.1	None	unique
		LCO 3.2.1 Action a.2	LCO 3.2.1 Action B.2.1	None	unique
3.2.2 None	None	N/A	N/A	N/A	
3.2.3 L.1	Extends the time available to reduce the Variable Overpower Trip Setpoint to 16 hours.	LCO 3.2.3 Action b.2	LCO 3.2.3 Action B.2	VII	

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Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.2.3 L.2	Requires placing the plant in a condition where the LCO does not apply if the Azimuthal Power Tilt is not within limits. CTS did not and therefore entry into 3.0.3 may have been required.	LCO 3.2.3 Actions	LCO 3.2.3 Action C	V	
3.2.4 L.1	Eliminates the requirement to initiate corrective action within 15 minutes to restore DNBR within the LCO limit.	LCO 3.2.4 Action a.1	LCO 3.2.4 Action A.1 Action B.1.2	None	unique
3.2.5 L.1	Adds a note that allows the SR to be performed up to 2 hours after MODE 1 is greater than 20% RTP.	SR 4.2.7	SR 3.2.5.1	II	
3.3.1 L.1	Eliminates the requirement for the Logarithmic Power Level - High RPS trip function to be OPERABLE in MODE 1.	LCO 3.3.1 Table 3.3-1 Item B.2.a	LCO 3.3.1 Table 3.3.3-1 Item 2	I	
3.3.1 L.2	Eliminates the requirement to perform the Logarithmic Power Level - High functional test within 7 days of startup or prior to closing the RTCBs with the CEA drive system capable of rod withdrawal.	LCO 3.3.1 Table 4.3-1 Item I.B.2	LCO 3.3.1 Table 3.3.3-1 Item 2	II	
3.3.1 L.3	Adds a NOTE for CHANNEL FUNCTIONAL TEST of the Logarithmic Power Level Channels to state that it doesn't require testing in MODE 1 and allows a two hour time limit to perform the required testing after reducing thermal power and making MODE 2 entry.	LCO 3.3.1 Table 4.3-1 Item I.B.2	SR 3.3.1.7	II	

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Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.3.1 L.4	Raises to 20% the RTP at which the linear power levels, CPC delta T power and CPC nuclear power signals are adjusted to agree with the calorimetric calculation.	LCO 3.3.1 Table 4.3-1 Note (2)	SR 3.3.1.4	II	
3.3.1 L.5	Not Used	N/A	N/A	N/A	
3.3.1 L.6	Extends the time allowed to repair the INOPERABLE channel until prior to the next MODE 2 entry following the next MODE 5 entry.	LCO 3.3.1 Table 3.3-1 Action 2	LCO 3.3.1 Action A.2 Action C.2.2	VII	
3.3.1 L.7	Wording changed regarding instrument and bypass removal channels to clarify that only the automatic bypass removal function affects the OPERABILITY of the channel.	LCO 3.3.1	LCO 3.3.1	IX	
3.3.1 L.8	Provides a new Action for inoperable channel operational bypass removal functions for channels that are equipped with operational bypasses.	LCO 3.3.1 Table 3.3-1 Action 2	LCO 3.3.1 Action C	IX	
3.3.1 L.9	Reduces the FUNCTIONAL TEST requirements following a CPC cabinet high temperature alarm to only the channel that alarmed.	SR 4.3.1.6	LCO 3.3.1 Action E	V	
3.3.2 L.1	Allows operation with one Logarithmic Power Level - High channel tripped and one channel bypassed longer than 48 hours and permits the plant to change MODES.	LCO 3.3.2 Table 3.3-1 Item B.2.a (Action 2)	LCO 3.3.2 Action B	IX	

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Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.3.2 L.2	Extends the time allowed to repair the INOPERABLE channel until prior to the next MODE 2 entry following the next MODE 5 entry.	LCO 3.3.1 Table 3.3-1 Action 2	LCO 3.3.2 Action A.1 Action C	VII	
3.3.2 L.3	Eliminates the requirement to perform the Logarithmic Power Level - High functional test within 7 days of startup or prior to closing the RTCBs with the CEA drive system capable of rod withdrawal.	LCO 3.3.1 Table 4.3-1 Item I.B.2	LCO 3.3.2 Table 3.3.2-1 Item 1 (SR 3.3.2.2)	II	
3.3.2 L.4	Wording changed regarding instrument and bypass removal channels to clarify that only the automatic bypass removal function affects the OPERABILITY of the channel.	LCO 3.3.1	LCO 3.3.2	IX	
3.3.2 L.5	Provides a new Action for inoperable channel operational bypass removal functions for channels that are equipped with operational bypasses.	LCO 3.3.1 Table 3.3-1 Action 2	LCO 3.3.1 Action C	IX	
3.3.2 L.6	Clarifies the intent of the requirement to lower the setpoint for the Logarithmic Power Level - High RPS trip in MODES 3, 4 and 5 with the RTCBs closed and the CEDMCS capable of CEA withdrawal. Removes the option of using the CPCs for protection in these MODES.	LCO 3.3.1 Table 3.3-1 Action 10	LCO 3.3.2 Table 3.3.2-1 Item 1	None	unique
3.3.2 L.7	Eliminates the requirement for OPERABILITY of the Low Steam Generator Pressure reactor trip function in MODE 4	LCO 3.3.1 Table 3.3-1 Item I.A.5	LCO 3.3.2 Table 3.3.2-1 Item 2 and 3	I	

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Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.3.2 L.7	Eliminates the requirement for OPERABILITY of the Low Steam Generator Pressure reactor trip function in MODE 4	LC0 3.3.1 Table 4.3-1 Item I.A.5	LC0 3.3.2 Table 3.3.2-1 Item 2 and 3	I	
3.3.3 L.1	Reduces the FUNCTIONAL TEST REQUIREMENT for CPCs following a cabinet high temperature alarm to only the affected channel (B or C).	SR 4.3.1.6	LC0 3.3.3 Action C	VI	
3.3.3 L.2	Extends the (INOPERABLE CEACs) Completion Time allowed to increase the DNBR margin and the Reactor Power Cutback (RPC) System to be disabled from one hour to four hours.	LC0 3.3.1 Table 3.3-1 Action 6.b.1	LC0 3.3.3 Action B	VII	
3.3.3 L.3	Eliminates the Required Action to reduce the Surveillance Frequency from twelve hours to four hours for CEA verification Surveillances (CTS 4.1.3.5, 4.1.3.6 and 4.1.3.7).	LC0 3.3.1 Table 3.3-1 Action 6.b.3	LC0 3.3.3 Action B.2	None	unique
3.3.3 L.4	Eliminates specification of the allowed modes of movement used for CEA motion permitted by the Action Statement.	LC0 3.3.1 Table 3.3-1 Action 6.b.2.c	LC0 3.3.3 Action B.2	None	unique
3.3.4 L.1	Extends the Required Action Completion time for opening all RTCBs from one hour to six hours under the condition of one Matrix Channel inoperable in MODES 3, 4 and 5 with the RTCBs closed and the CEA system capable of CEA withdrawal (following a failure to restore the inoperable channel within 48 hours).	LC0 3.3.1 Table 3.3-1 Action 9	LC0 3.3.4 Action E	VII	

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3.3.4 L.2	Extends the range of MODES in which the RTCBs may be closed for Surveillance Testing to all MODES instead of just MODES 1 and 2.	LCO 3.3.1 Table 3.3-1 Action 5	LCO 3.3.4 Action C	IX	
3.3.4 L.3	Adds a new Action for two channels of RTCBs, Manual Trip or Initiation Logic, affecting the same trip leg inoperable, that requires the affected RTCBs to be opened immediately. Because of the new Action, an entry into LCO 3.0.3 is not required for this condition.	LCO 3.3.1 Table 3.3-1	LCO 3.3.4 Action D	V  VIII	
3.3.4 L.4	Allows opening the redundant RTCB in the affected trip path with an inoperable Initiation Logic channel, Manual Trip channel or RTCB, thereby insuring trip availability while preserving failure evidence.	LCO 3.3.1 Table 3.3-1 Action 5	LCO 3.3.4 Action B	IX	
3.3.5 L.1	Extends the time allowed to repair the INOPERABLE channel until prior to the next MODE 2 entry following the next MODE 5 entry.	LCO 3.3.1 Table 3.3-3 Action 13	LCO 3.3.5 Action A	VII	
3.3.5 L.2	Provides a new Action for inoperable channel operational bypass removal functions for channels that are equipped with operational bypasses.	LCO 3.3.2 Table 3.3-3 Action 14.b	LCO 3.3.5 Action D	None	unique
3.3.5 L.3	Relaxes the requirement for the Main Steam Isolation Signal (MSIS) Function (SG Press-Low, SG Press-High and Containment Press-High Signals) to be OPERABLE when all associated valves isolated by the MSIS are closed since the function is not needed in that condition.	LCO 3.3.2 Table 3.3-3 Item IV.A	LCO 3.3.5 Table 3.3.5-1 Note (c)	IX	

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Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.3.5 L.4	Wording changed regarding instrument and bypass removal channels to clarify that only the automatic bypass removal function affects the OPERABILITY of the channel.	LCO 3.3.2	LCO 3.3.5	IX	
3.3.5 L.5	Eliminates the requirement to demonstrate during the at-power CHANNEL FUNCTIONAL TEST that the bypass logic is OPERABLE and requires it to be done within 92 days of each reactor start-up.	SR 4.3.2.2	SR 3.3.3.5	II	
3.3.5 L.6	Eliminates the MODE 4 requirement for the SIAS and MSIS sensor/trip units to be OPERABLE.	LCO 3.3.2 Table 3.3-3 Item IV.A	LCO 3.3.5 Table 3.3.5-1 Item 4	I	
		LCO 3.3.2 Table 4.3-2 Item I.A	LCO 3.3.5 Table 3.3.5-1 Item 4	I	
3.3.6 L.1	Adds a new Action for one or more functions with two initiation logic channels or Manual Trip channels affecting the same trip leg inoperable. Because of the new Action, an entry into LCO 3.0.3 is not required for this condition.	LCO 3.3.2 Table 3.3-3 Item II.B	LCO 3.3.6 Action C	V  VIII	

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Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.3.6 L.2	Eliminates the requirement for the CSAS, MSIS and AFAS Initiation Logic, Actuation Logic and Manual Trip to be OPERABLE in MODE 4.	LCO 3.3.1 Table 3.3-1 Items: III.B, III.C, IV.B, IV.C, VI.B, VI.C, VII.B, VII.C	LCO 3.3.6 Table 3.3.6-1	I	
3.3.6 L.2	Eliminates the requirement for the CSAS, MSIS and AFAS Initiation Logic, Actuation Logic and Manual Trip to be OPERABLE in MODE 4.	LCO 3.3.1 Table 4.3-2 Items: III.B, III.C, IV.B, IV.C, VI.B, VI.C, VII.B, VII.C	LCO 3.3.6 Table 3.3.6-1	I	
3.3.6 L.3	Changes the Action Requirement for inoperable Initiation Logic or Manual Trip (dropping the MODE 5 transition) because the requirement for CSAS, MSIS and AFAS to be OPERABLE in MODE 4 has been eliminated.	LCO 3.3.2 Table 3.3-3 Action 12	LCO 3.3.6 Action E	V	
3.3.6 L.4	Changes the Action Requirement for inoperable Matrix Logic channel (dropping the MODE 5 transition) because the requirement for CSAS, MSIS and AFAS to be OPERABLE in MODE 4 has been eliminated.	LCO 3.3.2 Table 3.3-3 Action 17	LCO 3.3.6 Action E	V	
3.3.6 L.5	Allows an additional 16 hours for restoration of an inoperable automatic actuation logic channel	LCO 3.3.2 Table 3.3-3 Action 16	LCO 3.3.6 Action D	VII	

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Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.3.6 L.6	Relaxes the interval requirement for testing Actuation Logic subgroup relays to 18 month intervals while shutdown, deleting the requirement to test "...during each Cold Shutdown unless tested within the previous 62 days."	LCO 3.3.2 Table 4.3-2 Note (3)	SR 3.3.6.2	II	
3.3.6 L.7	Adds a NOTE which eliminates the requirement for the MSIS function to be OPERABLE when all the associated valves isolated by the MSIS function are closed.	LCO 3.3.2 Table 3.3-3	LCO 3.3.6 Table 3.3.6-1 Item 5 NOTE a	IX	
3.3.6 L.8	Extends the Surveillance Interval for Actuation Logic subgroup relays from 62 days (on a STAGGERED TEST BASIS) to 9 months (on a STAGGERED TEST BASIS).	SR 4.3.2.1 Table 4.3-2 Note (1), (3)	SR 3.3.6.2	None	unique
3.3.6 L.9	Eliminates the requirement for the SIAS Matrix Logic to be OPERABLE in MODE 4.	LCO 3.3.1 Table 3.3-1 Item I.B.1	LCO 3.3.6 Table 3.3.6-1 Item 1.a	I	
		LCO 3.3.1 Table 4.3-2 Item I.B.1	LCO 3.3.6 Table 3.3.6-1 Item 1.a	I	
3.3.7 L.1	Extends the time allowed to repair the INOPERABLE channel until prior to the next MODE 2 entry following the next MODE 5 entry.	LCO 3.3.2 Table 3.3-3 Action 13	LCO 3.3. Action A	VII	
3.3.7 L.2	Adds a new Action that permits one hour to restore all but two channels of LOSS OF VOLTAGE to OPERABLE status instead of forcing LCO 3.0.3 entry.	LCO 3.3.2 Table 3.3-3 Item VIII.A	LCO 3.3.7 Action C	V  VIII	

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Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.3.7 L.3	Extends the time permitted to transition into MODE 4 if more than two channels of Degraded Voltage relays are inoperable.	LCO 3.3.2 Table 3.3-3 Action 19	LCO 3.3.7 Action D	V	
3.3.8 L.1	Permits suspension of CORE ALTERATIONS and suspension of the movement of irradiated fuel assemblies within containment as an alternative to closing the containment purge valves if both channels of radiation monitors are inoperable	LCO 3.3.3.1 Table 3.3-6 Action 25	LCO 3.3.8 Action C	V	
3.3.8 L.2	Extends the Surveillance Interval of the radiation monitor CHANNEL FUNCTIONAL TEST to 92 days from weekly.	SR 4.3.3.1 Table 4.3-3 Inst 1.C	SR 3.3.8.2	II	
3.3.8 L.3	Eliminates the MODE 5 and 6 specific requirements for the CPIAS radiation monitors to be OPERABLE during containment purge.	SR 4.3.3.1 Table 3.3-6 Inst 1.D	LCO 3.3.8	I	
		SR 4.3.3.1 Table 4.3-3 Inst 1.C	LCO 3.3.8	I	
3.3.8 L.4	Extends the Surveillance Interval of the CHANNEL FUNCTIONAL TEST of the radiation monitors from "prior to release" to 18 months.	SR 4.3.3.1 Table 4.3-3 Inst 1.C	SR 3.3.8.3	II	
3.3.9 None	None	N/A	N/A	N/A	

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3.3.10 L.1	Eliminates the 7 day shutdown requirement and extends the time available to restore a single channel of PAM instrumentation to OPERABLE status to 30 days or submittal of a report to the NRC within 14 days describing the circumstances and plan for recovery.	LCO 3.3.3.6 Table 3.3-10 Action 29	LCO 3.3.10 Action A	V	
3.3.10 L.2	Extends the time available to restore two inoperable PAM channels from 48 hours to 7 days (followed by a more precise rate of decent to MODE 4).	LCO 3.3.3.6 Table 3.3-10 Action 30	LCO 3.3.10 Action E	VII	
3.3.10 L.3	Extends the time available to restore inoperable Reactor Vessel Water Level instrumentation from 7 days to 30 days for a single channel inoperable.	LCO 3.3.3.6 Table 3.3-10 Action 31	LCO 3.3.10 Action A	VII	
	Extends the time available to restore inoperable Reactor Vessel Water Level instrumentation from 48 hours to 7 days for two inoperable channels.	LCO 3.3.3.6 Table 3.3-10 Action 31	LCO 3.3.10 Action C	VII	
3.3.10 L.4	Relaxes the requirement for a single inoperable Containment Hydrogen Monitor by not requiring shutdown to MODE 3 if it is not restored within 30 days.	LCO 3.6.4.1 Action a	LCO 3.3.10 Action A	V VIII	
3.3.10 L.5	Extends the Surveillance Interval for the Containment Hydrogen Monitor CHANNEL CHECK from once per 12 hours to once per 31 days.	SR 4.6.4.1	SR 3.3.10.1	II	
3.3.10 L.6	Extends the Surveillance Interval for the Containment Hydrogen Monitor CHANNEL CALIBRATION from 92 days on a STAGGERED TEST BASIS to 18 months.	SR 4.6.4.1	SR 3.3.10.2	II	

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3.3.10 L.7	Deletes the Action requirement for Radiation Monitors with trip setpoints exceeding the allowable value.	LCO 3.3.3 Action a	LCO 3.3.10	IX	
3.3.10 L.8	Deletes the Surveillance Requirement for a CHANNEL FUNCTIONAL TEST on the Radiation Monitors and Containment Hydrogen Monitors.	SR 4.3.3.1	LCO 3.3.10	VI	
		SR 4.6.4.1	LCO 3.3.10	VI	
3.3.10 L.9	Deletes the requirement for the Containment Area Radiation Monitors to be OPERABLE in MODE 4.	LCO 3.3.3.1 Table 3.3-6 Item 1.C	LCO 3.3.10 Table 3.3.10-1 Item 9	I	
		LCO 3.3.3.1 Table 4.3-3 Item 1.D	LCO 3.3.10 Table 3.3.10-1 Item 9	I	
3.3.10 L.10	Extends the time available to restore inoperable Containment Area Radiation Monitors from 72 hours to 30 days followed by submittal of a report to the NRC for a single channel inoperable.	LCO 3.3.3.6 Table 3.3-6 Action 27	LCO 3.3.10 Action A	VII	
	Extends the time available to restore inoperable Containment Area Radiation Monitors from 72 hours to 7 days followed by submittal of a report to the NRC for two channels inoperable.	LCO 3.3.3.6 Table 3.3-6 Action 27	LCO 3.3.10 Action C	VII	

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Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.3.10 L.11	Extends the Surveillance Interval for the Containment Area Radiation Monitor CHANNEL CHECK from once per 12 hours to once per 31 days.	SR 4.3.3.1 Table 4.3-3 Item 1.D	SR 3.3.10.1	II	
3.3.10 L.12	Eliminates the NOTE that states that the provisions of Specification 3.0.3 are not applicable. Since ITS provides direction for two Containment Area Radiation Monitors inoperable and CTS did not, this NOTE is no longer necessary.	LCO 3.3.3.1 Action c	LCO 3.3.10	V VIII	
3.3.10 L.13	Adds a NOTE to clarify that CHANNEL CALIBRATION for Neutron Detectors is not required, thus eliminating this Surveillance Requirement.	SR 4.3.3.6 Table 4.3-7 Item 16	SR 3.3.10.2	VI	
3.3.11 L.1	Extends the time allowed to restore an inoperable channel from 7 days to 30 days.	LCO 3.3.3.5 Action a, b	LCO 3.3.11 Action A, B	V VIII	
3.3.11 L.2	Adds the statement "that is normally energized" to identify instrumentation channels that require CHANNEL CHECKS. This statement eliminates the need to energize instrumentation (that is not normally energized at power) in order to test it and thereby reduces the scope of testing.	SR 4.3.3.5.a	SR 3.3.11.1	II	
3.3.11 L.3	Surveillance wording changed to permit the use of continuity checks to verify that disconnect switches will open when required.	SR 4.3.3.5.b	SR 3.3.11.2	VI	

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3.3.11 L.4	Adds a NOTE to clarify that CHANNEL CALIBRATION for Neutron Detectors is not required, thus eliminating this Surveillance Requirement.	SR 4.3.3.5	SR 3.3.11.3	VI	
3.3.12 L.1	Combines Required Actions for two channels of Boron Dilution Alarms inoperable and eliminates the MODE 6 related actions (MODE 6 requirements are addressed in ITS 3.9.2).	LCO 3.1.2.7 Action b.1 Action b.2	LCO 3.3.12 Action B	V	
3.3.12 L.2	Not Used	N/A	N/A	N/A	
3.3.12 L.3	Changes the OPERABILITY requirements for MODEs 3, 4 and 5 with RTCBs open by deleting the need for two channels of Logarithmic Power Indication and adding the requirement for two channels of Boron Dilution Alarms.	LCO 3.3.1 Table 3.3-1 Item I.B.2.b	LCO 3.3.12	none	unique
		LCO 3.3.1 Table 4.3-1 Item I.B.2.b	LCO 3.3.12	none	unique
3.3.12 L.4	Extends the Surveillance Interval for the BDAS CHANNEL FUNCTIONAL TEST from 31 days of cumulative operation during shutdown to 92 days and adds a NOTE stating that the SR isn't required until 72 hours after neutron flux is within the startup range.	SR 4.1.2.7.b	SR 3.3.12.2	II	
3.4.1 L.1	Introduces a NOTE which specifies two instances when the pressurizer pressure LCO doesn't apply, thus relaxing the requirements from CTS.	LCO 3.2.8	LCO 3.4.1	IX	

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Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.4.1 L.2	Relaxes the Action Requirement for when RCS flow rate is determined to be less than the limit by allowing two hour in which to attempt to restore flow and two additional hour in which to reach MODE 2.	LCO 3.2.5 Action	LCO 3.4.1	VII	
3.4.2 L.1	Extends the time period prior to achieving criticality in which the RCS cold leg temperature must be determined to be >545°F from 15 minutes to 30 minutes.	SR 4.1.1.4	SR 3.4.2.1	II	
3.4.3 L.1	Extends the time allowed to determine RCS suitability for further operation following out of parameter conditions from 6 hours to 72 hours.	LCO 3.4.8.1 Action	LCO 3.4.3 Action A.2	VII	
3.4.4 L.1	Extends the time allowed to reach MODE 3 with less than 2 RCPs in each loop from 1 hour to 6 hours.	LCO 3.4.4.1 Action	LCO 3.4.4 Action A	VII	
3.4.5 None	None	N/A	N/A	N/A	
3.4.6 None	None	N/A	N/A	N/A	
3.4.7 L.1	Adds a NOTE that allows all SDC trains to be removed from operation during a planned heatup to MODE 4 when at least one RCS loop is in operation.	SR 4.4.1.4.1.2	LCO 3.4.7 NOTE 5	IX	
3.4.8 None	None	N/A	N/A	N/A	
3.4.9 None	None	N/A	N/A	N/A	

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Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.4.10 L.1	Addresses the condition where two or more pressurizer safety valves are inoperable and thereby avoids a forced entry into LCO 3.0.3 as is currently required by CTS.	LCO 3.4.2.2 Actions	LCO 3.4.10 Action B	None	unique
3.4.10 L.2	Permits pressurizer safety valve settings to be outside the limits of the LCO for 72 hours following entry into MODE 3 for the purpose of setting the pressurizer safety valve lift settings under ambient conditions.	LCO 3.4.2.2	LCO 3.4.10	IX	
3.4.10 L.3	Eliminates current conflict between CTS 3.4.2.2 and 3.4.2.1 regarding more than one but not all pressurizer safety valves (PSVs) OPERABLE. The requirements of CTS 3.4.2.1 are utilized to permit operation in MODE 4 with one or more PSVs OPERABLE.	LCO 3.4.2.1 Actions LCO 3.4.2.2 Actions	LCO 3.4.10 LCO 3.4.11	IX	
3.4.11 L.1	Eliminates the requirement to suspend all operations involving positive reactivity changes with no pressurizer code safety valve operable.	LCO 3.4.2.1 Action a	LCO 3.4.11 Action A	V	
3.4.11 L.2	Permits pressurizer safety valve settings to be outside the limits of the LCO for 72 hours following entry into MODE 3 (and in MODE 4) for the purpose of setting the pressurizer safety valve lift settings under ambient conditions.	LCO 3.4.2.1 Action b	LCO 3.4.11 Action B	IX	
3.4.11 L.3	Relaxes the MODE 4 Applicability of the Pressurizer Safety Valve LCO depending on RCS cold leg temperature.	LCO 3.4.2.1	LCO 3.4.11	I	

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Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.4.12 L.1	Relaxes the MODE 4 applicability for the Pressurizer Vents LCO to MODE 4 with pressure $\geq$ 385 psig.	LCO 3.4.10	LCO 3.4.11	I	
3.4.13 L.1	Changes the Surveillance Frequency for the RCS vent pathway from 12 hours to 31 days since PVNGS has no valves in the RCS vent pathway.	SR 4.4.8.3.1	SR 3.4.13.1	II	
3.4.13 L.2	Includes the provisions for a depressurized RCS with a 16 square-inch RCS vent without requiring the unnecessary removal of the reactor vessel head. It also allows entry into a MODE of Applicability for ITS LCO 3.4.13 with one or more SCS relief valves inoperable.	LCO 3.4.8.3	LCO 3.4.13	IX	
3.4.14 L.1	Eliminates the explicit requirement for early RCS water inventory balance performance.	LCO 3.4.5.2 Action d	LCO 3.4.14	V	
3.4.14 L.2	Explicitly details the requirements for completing the RCS water inventory balance.	SR 4.4.5.2.1.c	SR 3.4.14.1	VI	
3.4.15 L.1	Changes the limit on leakage from PIVs from 1 gpm to a rate based on the size of the valve (up to 5 gpm).	LCO 3.4.5.2	LCO 3.4.15	VI	
3.4.15 L.2	Provides an exception to MODE 4 for operability of the SDC PIVs "when in, or during the transition to or from, the SDC mode of operation."	LCO 3.4.5.2	LCO 3.4.15	IX	
3.4.15 L.3	Allows the use of a check valves to perform the function of isolation when RCS pressure isolation valve leakage is above the limit.	LCO 3.4.5.2 Action C	LCO 3.4.15 Action A.1	V	

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3.4.15 L.4	Eliminates the LCO 3.0.4 (CTS 4.0.4) exclusion footnote and modifies the SR performance requirements in its place.	SR 4.4.5.2.2	SR 3.4.15.1 NOTE	IX	
3.4.15 L.5	Adds an allowance to limit testing of PIVs actuated during performance of the Surveillance, providing that the PIV actuation is unavoidable.	SR 4.4.5.2	SR 3.4.15.1	VI	
3.4.16 L.1	Adds an LCO 3.0.4 exemption to the Action Statements A and B which allow changing MODEs while RCS leakage detection instrumentation are inoperable.	LCO 3.4.5.1	LCO 3.4.16	IX	
3.4.16 L.2	Extends the Completion Time for obtaining grab samples and analyzing them from 12 hours to obtain and 3 to analyze to a total of 24 hours.	LCO 3.4.5.1 Action a	LCO 3.4.16 Action B	VII	
3.4.16 L.3	Eliminates the requirement to return the inoperable containment atmosphere radioactivity monitor to Operable status within 72 hours or place a moveable air monitor in-line.	LCO 3.3.3.1 Action 27	LCO 3.4.16 Action B	V	
3.4.17 L.1	Eliminates the RCS Specific Activity MODE 4 and 5 Applicability and reduces the MODE 3 Applicability to $T_{cold} \geq 500^{\circ}\text{F}$ .	LCO 3.4.7	LCO 3.4.17	I	
3.4.17 L.2	Adds a NOTE that states that LCO 3.0.4 are not applicable, thus a MODE change is allowed with the reactor coolant specific activity Dose Equivalent I-131 is $> 1.0$ microcuries per gram.	LCO 3.4.7	LCO 3.4.17 Action A	IX	

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Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.4.17 L.3	Relaxes the sample frequency from 72 hours to 7 days.	LCO 3.4.7 Table 4.4-4 Item 1	SR 3.4.17.1	II	
3.4.17 L.4	Reduces the Applicability of the Surveillance to verify Dose Equivalent I-131 to only require performance in MODE 1.	LCO 3.4.7 Table 4.4-4 Item 4.b	SR 3.4.17.2	I	
3.5.1 L.1	The allowed outage time for a SIT that is INOPERABLE due to boron concentration being outside of the limits has been increased from 1 hour to 72 hours.	3.5.1	3.5.1	VII	
3.5.1 L.2	The action requirements for a SIT that is INOPERABLE due to a closed isolation valve have been changed.	3.5.1	3.5.1	V	
3.5.2 L.1	Relaxes the requirement to verify that power is removed from the SIT isolation valve operator, raising it from 430 psia pressurizer pressure to 1500 psia.	SR 4.5.1.c	SR 3.4.2.5	VI	
3.5.2 L.2	The allowed outage time for a SIT that is INOPERABLE due to boron concentration being outside of the limits has been increased from 1 hour to 72 hours.	3.5.1	3.5.2	VII	
3.5.2 L.3	The action requirements for a SIT that is INOPERABLE due to a closed isolation valve have been changed.	3.5.1	3.5.2	V	
3.5.2 LB.1	Changes the minimum nitrogen cover pressure (indicated) from 254 psig to 260 psig	LCO 3.5.1 Note +	SR 3.5.2.3	None	unique

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Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.5.3 L.1	Relaxes the requirements for restoring ECCS trains to OPERABILITY. This permits taking credit for combining OPERABLE components from different trains to achieve the equivalent availability of 100% ECCS flow.	LCO 3.5.2 Action a	LCO 3.5.3 Action B	IX	
3.5.3 L.2	Reduces the Actions necessary to respond to a condition where the ECCS subsystem cannot be returned to OPERABLE status. ITS requires that pressurizer pressure be reduced to less than 1837 psia and $T_c$ be reduced to <485°F where CTS requires that the plant be placed in HOT STANDBY.	LCO 3.5.2 Action a	LCO 3.5.3 Action C	V	
3.5.3 L.3	Expands the methods allowed for initiating a signal to verify ECCS response. CTS required the use of a test signal while ITS allows using an actual or simulated signal.	SR 4.5.2.e.1 SR 4.5.2.e.2 SR 4.5.2.e.3	SR 3.5.3.4 SR 3.5.3.5 SR 3.5.3.6	VI	
3.5.3 L.4	Eliminates the Surveillance Requirement to verify that listed valves in the ECCS flow path are in their required position. The PVNGS design doesn't include any valves that meet the Bases for this Surveillance.	SR 4.5.2.a	LCO 3.5.3	VI	
3.5.4 L.1	Extends the time allowed to place the plant in COLD SHUTDOWN with no ECCS subsystem OPERABLE by four hours.	LCO 3.5.3 Action a	LCO 3.5.4 Action A	V	
3.5.5 L.1	Extends the time allowed to restore the RWT temperature to within OPERABLE status from 1 hour to 8 hours.	LCO 3.5.4 Action	LCO 3.5.5 Action A	VII	

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Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.5.6 L.1	Provides an 72 hour Action to restore inoperable TSP to within its limit and thus does not force an entry into Specification 3.0.3.	LCO 3.5.2	LCO 3.5.6 Action A	V	
3.6.1 None	None	N/A	N/A	N/A	
3.6.2 L.1	Removes the restriction for restoring the overall airlock leakage prior to performing the next surveillance test.	LCO 3.6.1.3 Action a.1	LCO 3.6.2 Action A	V	
3.6.2 L.2	Expansion of allowance to open the OPERABLE air lock door and total time it may remain open.	LCO 3.6.1 3 Action a.1	LCO 3.6.2 Action NOTE 1 Act. A NOTE 2	IX	
3.6.2 L.3	Relaxation of airlock door position verification requirement to permit it to be done by administrative means if the Operable door is in a high radiation area.	LCO 3.6.1.3 Action a.1	LCO 3.6.2 Action A.3, B.3	IX	
3.6.2 L.4	Eliminates requirement to shutdown if the airlock door is inoperable due to an inoperable interlock mechanism.	LCO 3.6.1.3 Action b	LCO 3.6.2 Action B	VII	
3.6.2 L.5	Extends the surveillance interval for airlock doors from 6 months to 24 months.	SR 3.6.2.2	SR 4.6.1.3.c	II	

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Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.6.3 L.1	Relaxation of position verification requirements for manual valves, blind flanges and deactivated automatic valves to permit it to be done by administrative means if the device is located in a high radiation area.	SR 4.6.1.1.a	LCO 3.6.3 Actions A.2, C.2 and E.2  SR 3.6.3.3 SR 3.6.3.4	VI  IX	
3.6.3 L.2	Extends the leak rate testing surveillance interval on 42" Containment purge isolation valves from once per 6 months (on a STAGGERED TEST BASIS) to every 184 days and within 92 days after opening the valve.	SR 4.6.1.7.2	SR 3.6.3.6	II	
	Extends the leak rate testing surveillance interval on 8" containment purge valves from 92 days to 184 days and within 92 days after opening.	SR 4.6.1.7.3	SR 3.6.3.6	II	
3.6.3 L.3	Expands the permitted method of verification of automatic valve actuation from only using a test signal to using either a simulated or actual actuation signal.	SR 4.6.3.2	SR 3.6.3.7	VI	
3.6.3 L.4	Relaxes Surveillance Requirements for automatic CIVs to only require testing valves that are not locked, sealed or otherwise secured in position (which are administratively controlled).	SR 4.6.3.2	SR 3.6.3.7	VI	
3.6.3 L.5	Eliminates the requirement for 8" containment purge valves to be sealed closed	SR 4.6.1.7.4	SR 3.6.3.2	VI	

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Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.6.3 L.6	Relaxes the surveillance interval for verification of penetrations not capable of being closed by OPERABLE containment isolation valves and required to be closed during accident conditions. The interval is changed from "...during each cold shutdown but not more often than once per 92 days" to "prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days."	SR 4.6.1.1.a	LCO 3.6.3 Action A.2, D.2 SR 3.6.3.4	II VII	
3.6.3 L.7	Reduces the position verification requirements for containment isolation valves and blind flanges that are not capable of automatic closure and required closed during accident conditions. The scope of this verification is reduced to just those valves that are not locked, sealed or otherwise secured in the closed position.	SR 4.6.1.1.a SR 4.6.1.1.a*	SR 3.6.3.3 SR 3.6.3.4	VI	
3.6.3 L.8	Reduces the scope of stroke time testing requirements from power operated or automatic valves used in CIAS, CPIAS or CSAS to just automatic power operated containment isolation valves.	SR 4.6.3.3	SR 3.6.3.5	None	unique
3.6.3 L.9	Extends the time allowed to respond with two containment isolation valves inoperable in the same penetration, allowing an hour to isolate the affected penetration prior to initiating a shutdown.	LCO 3.6.3 Action 1.d	LCO 3.6.3 Action B	VII	
3.6.4 None	None	N/A	N/A	N/A	

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Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.6.5 LB.1	Changes maximum containment air temperature from 120 degrees F to 117 degrees F to account for instrument uncertainty.	LCO 3.6.1.5	LCO 3.6.5	None	unique
3.6.6 L.1	Reduces the scope of valves in the flowpath required to be verified in the correct position to permit suction on the RWT on a CSAS test signal, eliminating valves that are locked, sealed or otherwise secured in position.	SR 4.6.2.1.a	SR 3.6.6.1	VI	
3.6.6 L.2	Expands the scope of initiating signals permitted to verify their automatic performance from just a test signal to either a simulated or actual initiation signal.	SR 4.6.2.1	SR 3.6.6.4 SR 3.6.6.5	VI	
3.6.6 LB.1	Changes the applicability of the containment spray specification to specify that RCS pressure must be greater than or equal to 385 psia.	LCO 3.6.2.1 Applicability	LCO 3.6.6 Applicability	None	unique
3.6.6 LB.2	Changes the containment spray fill header from 115 feet to 113 feet.	SR 4.6.2.1.c	SR 3.6.6.2	None	unique
3.6.7 L.1	Adds a condition to address the situation with two hydrogen recombiners inoperable and permits continued plant operation up to 7 days instead of forcing entry into Specification 3.0.3.	LCO 3.6.4.2	LCO 3.6.7 Condition B	V	
3.6.7 L.2	Not used	N/A	N/A	N/A	

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Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.6.7 L.3	Adds a NOTE which states that LCO 3.0.4 is not applicable and therefore permits MODE changes.	LCO 3.6.7	LCO 3.6.7 Action A	IX	
3.7.1 L.1	Adds VOPT and RTP information which allows continued operation with up to 4 inoperable MSSVs per operating steam generator while still complying with the LCO.	LCO 3.7.1.1	LCO 3.7.1	IX	
3.7.1 L.2	Extends the completion time for reducing the VOPT setpoint with one or more MSSVs inoperable from 4 hours to 12 hours.	LCO 3.7.1.1 Action a	3.7.1 Action A.2	VII	
3.7.1 L.3	Deletes the requirement for MSSVs to be OPERABLE in MODE 4.	LCO 3.7.1.1	LCO 3.7.1	I	
3.7.2 L.1	Requires four MSIVs be OPERABLE and adds a NOTE that states that "Separate Condition entry is allowed for each MSIV."	LCO 3.7.1.5	LCO 3.7.2 Action C	IX	
3.7.2 L.2	Allows the flexibility of using an actual or simulated actuation signal to initiate closed stroke time testing of the MSIVs.	SR 4.7.1.5.1	SR 3.7.2.1	VI	
3.7.2 L.3	Allows entry into MODE 3 to perform Surveillance testing of the MSIVs but doesn't specify a time limit for performing the Surveillance.	SR 4.7.1.5.2	SR 3.7.2.1	II	
3.7.2 L.4	Reduces the scope of MODE applicability by eliminating the condition where MSIVs are closed while in MODE 1, 2, 3 or 4.	LCO 3.7.1.5	LCO 3.7.2	I	

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3.7.3 L.1	Reduces the scope of MODE applicability by eliminating the condition where MSIVs are closed or isolated by a closed power operated valve while in MODE 1, 2, 3 or 4.	LCO 3.6.3	LCO 3.7.3	I	
3.7.3 L.2	Extends the time available to close the inoperable MSIV or isolate the penetration from 4 hours to 72 hours.	LCO 3.6.3 Action 1.a Action 1.b	LCO 3.7.3 Action A	VII	
3.7.4 L.1	Adds a NOTE which permits changing MODEs (3.0.4 exclusion) with only one OPERABLE ADV.	LCO 3.7.1.6 Action	LCO 3.7.3 Action A	IX	
3.7.4 L.2	Extends interval for exercising ADVs from prior to startup following any cold shutdown of 30 days or longer to 18 month intervals.	SR 4.7.1.6.b	SR 3.7.4.1	II	
3.7.5 L.1	Reduces the OPERABILITY requirements for AFW trains in MODE 4 to a single Train including a motor driven pump.	LCO 3.7.1.2	LCO 3.7.5	IX	
	Changes the Applicability of the Action requirements for multiple AFW pumps inoperable to reflect MODES 1, 2 and 3.	LCO 3.7.1.2 Action b, c	LCO 3.7.5 Action C, D	IX	.
	Adds a new Action and NOTE to provide direction when the required AFW pump is not OPERABLE in MODE 4.	LCO 3.7.1.2	LCO 3.7.5 Action E	IX	

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3.7.5 L.2	Adds a new NOTE which states "LCO 3.0.3 and all other LCO Required Actions requiring MODE changes are suspended until one AFW train is restored to OPERABLE status" which has the effect of suspending shutdowns.	LCO 3.7.1.2 Action c	LCO 3.7.5 Action D	V	
3.7.5 L.3	Eliminates the requirement to verify the correct actuation of valves which are locked, sealed, or otherwise secured in position.	SR 4.7.1.2.c.1	SR 3.7.5.3	VI	
3.7.5 L.4	Changes the MODE 4 Surveillance testing of AFW pump and valve automatic actuation by not requiring testing when the steam generator is required for heat removal (the pump is already running and auto-start is not required.)	SR 4.7.1.2.c	SR 3.7.5.3 SR 3.7.5.4	II	
3.7.5 L.5	Changes the Surveillance to allow the use of either a simulated or actual actuation signal for Surveillance purposes, thus permitting non-Surveillance actuations to be used to fulfill Surveillance requirements.	SR 4.7.1.2.c.1  SR 4.7.1.2.c.2	SR 3.7.5.3 SR 3.7.5.4	VI	
3.7.5 L.6	Eliminates the requirement to test AFW pumps on a STAGGERED TEST BASIS.	SR 4.7.1.2.b	SR 3.7.5.2	II	
3.7.6 L.1	Extends the time available to achieve end-state conditions for Action requirements from 12 hours to 24 hours (inoperable CST with the RWMT not verified operable within 4 hours or CST level can not be restored within 7 days).	LCO 3.7.1.3 Action b	LCO 3.7.6 Action B	V	

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Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.7.7 L.1	Limits the requirement to verify automatic valves servicing safety related equipment actuating to their correct position to only those valves that are not locked, sealed, or otherwise secured in position.	SR 4.7.3.b	SR 3.7.7.2	VI	
3.7.8 None	None	N/A	N/A	N/A	
3.7.9 None	None	N/A	N/A	N/A	
3.7.10 None	None	N/A	N/A	N/A	
3.7.11 L.1	Relaxes the MODE 5 and 6 requirement for the CREFS train placed in operation to comply with the Required Action to be capable of being powered by an OPERABLE emergency power source.	LCO 3.7.7 MODE 5 and 6 Action b	3.7.11 Action C	IX	
3.7.11 L.2	Eliminates the requirement to test CREFS on a STAGGERED TEST BASIS.	SR 4.7.7.a	SR 3.7.11.1	II	
3.7.11 L.3	Changes the Surveillance to allow the use of either a simulated or actual actuation signal for Surveillance purposes, thus permitting non-Surveillance actuations of CREFS to be used to fulfill Surveillance requirements.	SR 4.7.7.d.2	SR 3.7.11.3	VI	
3.7.11 L.4	Eliminates the requirement to suspend positive reactivity (boron concentration) changes in MODES 5 and 6	LCO 3.7.7 MODES 5 and 6 Action b	LCO 3.7.11 Action E	IX	

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Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.7.11 L.5	Extends the Surveillance testing interval of CREFS positive pressure testing by changing from 18 month intervals to 18 months on a STAGGERED TEST BASIS.	SR 4.7.7.d.3	SR 3.7.11.4	II	
3.7.12 L.1	Relaxes the requirement for the CREATCS train placed in operation to be capable of being powered from an OPERABLE emergency power source.	LCO 3.7.7 MODES 5 and 6 Action b	LCO 3.7.12 Action C	IX	
3.7.12 L.2	Eliminates the requirement to suspend positive reactivity (boron concentration) changes in MODES 5 and 6	LCO 3.7.7 MODES 5 and 6 Action b	LCO 3.7.12 Action E	None	unique
3.7.12 L.3	Extends the time available to restore the inoperable CREFS train to OPERABILITY from 7 days to 30 days.	3.7.7 Action	LCO 3.7.12 Action A	VII	
3.7.12 L.4	Not Used	N/A	N/A	N/A	
3.7.13 L.1	Eliminates the requirement to conduct the ESF 31 day Surveillance on a STAGGERED TEST BASIS.	SR 4.7.8.a	SR 3.7.13.1	II	
	Eliminates the requirement to initiate the ESF 31 day Surveillance from the Control Room.	SR 4.7.8.a	SR 3.7.13.1	VI	
3.7.13 L.2	Changes the Surveillance to allow the use of either a simulated or actual actuation signal for Surveillance purposes, thus permitting non-Surveillance actuations of the ESF PREACS to be used to fulfill Surveillance requirements.	SR 4.7.8.d.2	SR 3.7.13.3	VI	

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Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.7.14 L.1	Relaxes the Applicability to only during movement of irradiated fuel assemblies within the fuel storage pool instead of the CTS "whenever irradiated fuel assemblies are in the storage pool."	LCO 3.9.11	LCO 3.7.14	I	
3.7.14 L.2	Eliminates the requirement to restore water level to within its limit since suspending fuel movement precludes a fuel handling accident.	LCO 3.9.11 Actions	LCO 3.7.14	V	
3.7.15 L.1	Reduces the Applicability of "whenever fuel assemblies are in the spent fuel storage pool" by adding "and a fuel storage pool verification has not been performed since the last movement of fuel assemblies in the fuel storage pool."	LCO 3.9.13	LCO 3.7.15	I	
3.7.16 None	None	N/A	N/A	N/A	
3.7.17 None	None	N/A	N/A	N/A	
3.8.1 L.1	Changes the Surveillances to allow the use of either a simulated or actual actuation signal for Surveillance purposes, thus permitting non-Surveillance DG starts to be used to fulfill Surveillance requirements.	SRs 4.8.1.1.2.d.3 4.8.1.1.2.d.4 4.8.1.1.2.d.5 4.8.1.1.2.d.10	SRs 3.8.1.11 3.8.1.12 3.8.1.17 3.8.1.19	VI	
3.8.1 L.2	Removes the 24 hour constraint and allows the LCO to be exited prior to completion of the common mode failure evaluation without having to run the other DG.	LCO 3.8.1.1.b Footnote <sup>1</sup>	LCO 3.8.1 Action B.3	None	unique

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Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.8.1 L.3	Relaxes the constraint on performing the manual transfer of the onsite Class 1E power supply in MODES 3 and 4.	SR 4.8.1.1.1.b	SR 3.8.1.8	VI	
3.8.2 None	None	N/A	N/A	N/A	
3.8.3 None	None	N/A	N/A	N/A	
3.8.4 L.1	Not Used	N/A	N/A	N/A	
3.8.4 L.2	Allows the flexibility to perform a modified performance discharge test on the battery instead of a full performance discharge.	SR 4.2.8.1.e	SR 3.8.4.8	VI	
3.8.4 L.3	Deletes the requirement to verify that battery cell-to-cell and terminal connections are "tight."	SR 4.8.2.1.c.2	SR 3.8.4.4	VI	
3.8.4 L.4	The ITS definition of battery degradation is changed such that degradation is indicated when the battery capacity drops by more than 10% relative to the capacity on the previous performance test rather than the average of previous tests. This is less restrictive when the results of the previous test are lower than the average of the previous performance tests.	4.8.2.1.f	SR 3.8.4.8 Bases	II	
3.8.5 L.1	Not Used	N/A	N/A	N/A	

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Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.8.5 L.2	Adds a NOTE which identifies SRs precluded to prevent the DC sources necessary to support the DC electrical power subsystem(s) required by LCO 3.8.10 from being discharged or otherwise rendered inoperable during the performance of SRs.	SR 4.8.2.2	SR 3.8.5.1	None	unique
3.8.5 L.3	Adds an additional Action that states "Declare affected required feature(s) inoperable." This offers an option to the current requirement to suspend CORE ALTERATIONS, movement of irradiated fuel suspending operations involving positive reactivity additions.	LCO 3.8.3.2	LCO 3.8.5 Action A.1	None	unique
3.8.6 L.1	Extends the Action Completion time to verify Category C limits to once per 7 days and allows 31 days to restore Category A and B limits.	LCO 3.8.2.1 Table 4.8-2 Note (1), (2)	LCO 3.8.6 Action A.2, A.3	VII	
3.8.6 L.2	Provides an allowance that "...Level correction is not required, however, when battery charging is < 2 amps when on float charge."	LCO 3.8.2.1 Table 4.8-2	LCO 3.8.6 Table 3.8.6-1	IX	
3.8.6 L.3	Provides an allowance that "It is acceptable for the electrolyte level to temporarily increase above the specified maximum during equalizing charges provided it is not overflowing."	LCO 3.8.2.1 Table 4.8-2	LCO 3.8.6 Table 3.8.6-1	IX	
3.8.6 L.4	Not Used	N/A	N/A	N/A	
3.8.6 L.5	Not Used	N/A	N/A	N/A	
3.8.7 None	None	N/A	N/A	N/A	

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Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.8.8 L.1	Not Used	N/A	N/A	N/A	
3.8.8 L.2	Adds an additional Action that states "Declare affected required feature(s) inoperable." This offers an option to the current requirement to suspend CORE ALTERATIONS, movement of irradiated fuel suspending operations involving positive reactivity additions.	LCO 3.8.3.2	LCO 3.8.8 Action A.1	None	unique
3.8.9 L.1	Not Used	N/A	N/A	N/A	
3.8.9 L.2	Not Used	N/A	N/A	N/A	
3.8.10 L.1	Not Used	N/A	N/A	N/A	
3.8.10 L.2	Not Used	N/A	N/A	N/A	
3.8.10 L.3	Adds an additional Action that states "Declare affected required feature(s) inoperable." This offers an option to the current requirement to suspend CORE ALTERATIONS, movement of irradiated fuel suspending operations involving positive reactivity additions.	LCO 3.8.3.2	LCO 3.8.10 Action A.1	None	unique
3.9.1 None	None	N/A	N/A	N/A	
3.9.2 L.1	Eliminates the use of the term "not operating" in the Actions related to the SRMs functional condition.	LCO 3.9.2 Action a, b	LCO 3.9.2 Action A, B	None	unique
3.9.2 L.2	Eliminates the requirement to perform a CHANNEL FUNCTIONAL TEST on the SRMs since they do not provide control or alarm functions.	SR 4.9.2.b SR 4.9.2.c	LCO 3.9.2	IX	

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Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
3.9.3 L.1	Eliminates the requirement to use a manual actuation to test the containment purge valves and permits the flexibility to use an actual actuation to be credited for the Surveillance.	SR 4.9.9	SR 3.9.3.2	VI	
3.9.3 L.2	Relaxes the Surveillance Interval for demonstrating containment purge valve automatic isolation, going from within 72 hours prior to start of and once per 7 days during CORE ALTERATIONS to 18 months.	SR 4.9.9	SR 3.9.3.2	II	
3.9.3 L.3	Expands the type of closure device acceptable for piping penetrations (other than purge valve penetrations) which provide direct access from the containment atmosphere to outside atmosphere.	LCO 3.9.4.c.1	LCO 3.9.3 Action C.1	IX	
3.9.4 None	None	N/A	N/A	N/A	
3.9.5 None	None	N/A	N/A	N/A	
3.9.6 L.1	Eliminates the requirement to perform the Refueling Water Level Surveillance within 2 hours prior to the start of irradiated fuel assembly movement.	SR 4.9.10.1	SR 3.9.6.1	II	
3.9.7 L.1	Eliminates the requirement to perform the Refueling Water Level Surveillance within 2 hours prior to the start of irradiated fuel assembly movement.	SR 4.9.10.2	SR 3.9.7.1	II	
4.0 None	None	N/A	N/A	N/A	

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Discussion of Change	Description	CTS Section	ITS Section	Category	Characterization
5.0 L.1	Changes the responsibility for review of proposed tests and experiments which affect nuclear safety and are not addressed in the UFSAR or Technical Specifications from "Vice President Nuclear Production or his designee" to "Department Leader, Operations"	Section 6.5.2.5	Section 5.1.1	None	unique
5.0 LB.1	Changes the distance the dose is measured from, the source of radioactivity from 18 inches to 30 centimeters. This is consistent with the changes to 10CFR20	6.12.2	5.7.2	None	unique
5.0 LB.2	Not Used	N/A	N/A	N/A	N/A

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3.3	3.3.1 Table 3.3-1	Supplementary Protection System (SPS)
3.3	3.3.3.1 Table 3.3-6	Fuel Pool Area Monitor RU-31
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3.3	3.3.3.1 Table 3.3-6	Main Steam Area Monitors (RU-139 A&B, RU-140 A&B)
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3.3	3.3.3.2	Incore Detectors
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3.3	3.3.3.4	Meteorological Instrumentation
3.3	3.3.3.6	Post Accident Monitoring Instrumentation
3.3	3.3.3.7	Loose-Parts Detection System
3.3	3.3.3.8	Explosive Gas Monitoring Instrumentation
3.4	3.4.3.2	Auxiliary Spray



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3.4	3.4.6	RCS Chemistry
3.4	3.4.8.2	Pressurizer Heatup/Cooldown Limits
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3.4	3.4.10	Reactor Coolant System Vents (Reactor Vessel Head Vents only)
3.6	3.6.4.3	Hydrogen Purge Cleanup System
3.7	3.7.2	Steam Generator Pressure/Temperature Limitation
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3.7	3.7.10	Sealed Source Contamination
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3.8	3.8.4.2	Motor Operated Valve Thermal Overload Protection and Bypass Devices
3.9	3.9.3	Decay Time
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3.9	3.9.6	Refueling Machine
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3.10	3.10.3	Special Test Exception - Reactor Coolant Loops





CTS Section No.	CTS LCO #	CTS LCO Title
3.10	3.10.6	Special Test Exception - Safety Injection Tanks
3.10	3.10.7	Special Test Exception - Spent Fuel Pool Level
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3.10	3.10.9	Special Test Exception - Shutdown Margin and Kn-1 CEDMS



## **ENCLOSURE 2**

### **Summary of Enclosed ITS Changes**

1. The first part of the document is a list of names and addresses of the members of the committee.

# ITS Changes

Below are brief summaries of the changes being transmitted to the NRC in this submittal. These items were identified during phone conversations with the NRC staff to discuss the PVNGS responses to the NRC Requests for Additional Information (RAIs) and during reviews by the PVNGS staff. The affected pages for the changes addressed below are provided in Enclosure 3. In addition to the specific changes addressed below, the affected pages in Enclosure 3 also include some general format and editorial changes.

## Split Report

- The criteria referenced in the Split Report for the hydrogen monitor technical specification, CTS 3.6.4.1, has been changed to show that it meets criteria 3 instead of criteria 2 of 10 CFR 50.36.
- The Split Report has been revised to reflect that the hydrogen purge technical specification, CTS 3.6.4.3, does not meet the criteria of 10 CFR 50.36 and is therefore not being retained in the ITS. Appendix A of the Split Report also has been revised accordingly.

## Section 1.0, "Use and Application"

- The definition of shutdown margin has been revised in the ITS to concur with the CTS. The ITS had a provision that allowed the plant not to have to account for a stuck CEA if all of the CEA's are verified to be fully inserted by two independent means. This provision is not consistent with the PVNGS safety analysis and does not provide any benefit to PVNGS. This provision has been removed from the ITS.

## Section 2.0, "Safety Limit"

- No changes to this section.

## Section 3.0, "SR and LCO Applicability"

- No changes to this section.

## Section 3.1, "Reactivity Control"

- In specification 3.1.4, "Moderator Temperature Coefficient (MTC)," SR 3.1.4.1 has been revised to add the word "is".
- Conditions A and D for specification 3.1.5 have been revised to restate the CEA misalignment criteria.
- In specification 3.1.9, "STE-SDM," the LCO was written in text form as one paragraph. It has been re-written to itemize the LCO's that are being exempted during the physics testing. This format is similar to specifications 3.1.10, "STE-MODES 1 and 2," and 3.1.11, "STE-Reactivity Coefficient Testing."
- In specification 3.1.11, "STE-Reactivity Coefficient Testing," the applicability and Action B have been changed to be consistent with STE 3.1.10, "STE-MODES 1 and 2."



# ITS Changes

## Section 3.2, "Power Distribution Limits"

- The Bases for Specification 3.2.3, "Azimuthal Power Tilt (Tq)," Action B.4, has been changed to add clarification for the phrase "correct the cause."

## Section 3.3, "Instrumentation"

- Note 2 for SR 3.3.1.7, Channel Functional Test for RPS Instrumentation-Operating, has been changed to remove the phrase "and only if the RTCB are closed."
- Specification 3.3.12, "BDAS" has been changed to add a new Condition C to incorporate the actions that were in Conditions A.2 and B.2.
- The note at the beginning of the SR's for specification 3.3.2. has been moved so that it is under the title "Surveillance Requirements."
- The word "Feedwater" has been added to Table 3.3.5-1 functions 6 and 7.
- The words "not met" have been added to the end of Condition E of specification 3.3.5, "ESFAS Instrumentation".
- Revised responses have been provided for the RAI for section 3.3. The original RAI response for these two items was provided by PVNGS in letter number 102-04016, dated September 18, 1997. The responses were revised as requested by the NRC. The revised responses are for item numbers: 3.3.10-4 and 3.3.10-10.

## Section 3.4, "Reactor Coolant System"

- The letters LCO have been added to Condition C in front of the number 3.0.3 for specification 3.4.14.
- An M.DOC has been added for specification 3.4.16, "RCS Leak detection". This is to discuss the change for the containment radiation monitor to consist of both a particulate and a gaseous monitor. The change was previously addressed by an A.DOC.
- An M.DOC has been added to cover the addition of the as-left testing requirements of +/- 1% for the PZR Safety Valves in specifications 3.4.10 and 3.4.11. The change was previously addressed by an A.DOC.

## Section 3.5 "ECCS"

- The minimum and maximum safety injection tank volumes used in the safety analyses have been changed in ITS Bases 3.5.1 to reflect the PVNGS design bases.

## Section 3.6, "Containment Systems"

- A note has been added to specification 3.6.7, "Hydrogen Recombiner" to caution that shared equipment impacts all 3 units.
- The phrase "and following each closing as specified" has been deleted from the frequency of SR 3.6.1.2 (airlock testing) since it is part of the frequency specified in the Containment Leakage Rate Testing Program.



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## ITS Changes

- There are two ITS Bases additions that were deleted since they are not in accordance with the NUREG. Refer to SR 3.6.1-1, Bases page 3.6-4.
- A sentence that was removed from safety analysis section of the ITS Bases for Specification 3.6.2, page 3.6-12, has been reinserted.
- Wording has been removed from the Bases page 3.6-16 regarding two notes about the containment air lock. The notes addressed the suspension of actions while the airlock is under administrative control, and that inoperable interlocks do not impact the operability of both airlock doors.
- DOC LA.3 for the containment spray system has been reworded to clarify the changes for Thermography testing of the containment spray nozzles.
- DOC LA.2 for the hydrogen purge specification has been deleted since the relocation of this specification is covered in the split report.
- The Bases for SR 3.6.7.2 has been revised to remove the reference to the NUREG as the source of the SR frequency.
- The reference to NE #5 has been removed from the Bases markup page 3.6-73, Specification 3.6.

### Section 3.7, "Plant Systems"

- SR 3.7.5.4 states to "Verify that each AFW pump starts automatically on an actual or simulated actuation signal *when in MODES 1, 2 or 3*". The phrase "when in MODES 1, 2 or 3" has been removed.

### Section 3.8 Electrical Power Systems

- Specification 3.8.4 has been revised to incorporate the CTS change that will replace the battery brand "Exide" with the more generic term "low specific gravity cells." This change included adding the existing table from the CTS for the Exide batteries and replacing the term "Exide" with the phrase "low specific gravity cells." It also included incorporating the battery terminal voltage and battery capacity acceptance criteria from the CTS for the Exide batteries.
- The Bases has been changed to revise the definition of degradation to specify that it is a function of the change from the "previous performance test" instead of a change from "an average of previous performance tests."

### Section 3.9, "Refueling Operations"

- Editorial changes only.

### Section 4.0, "Design Control"

- No changes to this section.

### Chapter 5.0, "Administrative Control"

- The title of shift supervisor has been changed to shift manager.
- LA.14 has been revised to specify that the Process Control Program (PCP), currently in CTS 6.13, is being relocated to the QA Program Description and not the TRM.



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