

Turkey Point Units 3 and 4

Summary of ITS LAR Revision 1 Non-Editorial Changes

February 16, 2022

ITS Section Package	Title	Summary of Non-Editorial Changes	Overall Type of Change
Split Report		Revised relocation Table and added discussion related to Accident Monitoring Instruments non-Type 1 Category A Instruments removed from the TS and relocated to the TRM.	R
1.0	Use and Applications		
1.1	Definitions		
1.2	Logical Connectors		
1.3	Completion Times		
1.4	Frequency		
2.0	NA		
2.1	Safety Limits (SL)		
2.2	SL Violations	Disposition CTS Table 2.2-1 moved to 3.3.1 because Allowable Values are incorporated into ITS Table 3.3.1-1. Trip Setpoints are being moved to the TRM.	NA
3.0	LCO Applicability		
3.0	SR Applicability		
3.1	Reactivity Control Systems		
3.1.1	SDM		
3.1.2	Reactivity Balance		

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3.1.3	MTC	<ul style="list-style-type: none"> Revised ITS LCO 3.1.3 to streamline maximum upper MTC limit as a single value. Other values relocated to the COLR. CTS DOC A05 added. Editorial changes to ITS SR 3.1.3.2 Insert 1 consistent with ISTS Writer's Guide (TSTF-GG-05 Rev 1 ADAMS Accession No. ML070660229).. 	A NA
3.1.4	Rod Group Alignment Limits	Insert 1 to ITS 3.1.4 LCO reformatted and streamlined. Presentation preference change only.	NA
3.1.5	Shutdown Bank Insertion Limits		
3.1.6	Control Bank Insertion Limits		
3.1.7	Rod Position Indication	<ul style="list-style-type: none"> Revised acceptance criteria of ITS SR 3.1.7.1; verifying RPI within 12 steps of group demand counter at 20 and 215 steps consistent with Sequoyah Nuclear Plant (ADAMS Accession No. ML15176A718) Relocate CTS 4.1.3.2.2 to the TRM versus deleting it (originally deleted because it was thought to be performed with another SR). 	NA
3.1.8	Physics Tests Exceptions	Revised ITS 3.1.8 to reflect correct RTS Instrumentation Function number for Power Range Neutron Flux, P-10 interlock – Function 17.d instead of 18.e. Updated JFD reference to 2 and deleted JFD 4 since it is not used.	NA
3.2	Power distribution Limits		
3.2.1	Heat Flux Hot Channel Factor	<ul style="list-style-type: none"> Deleted SR 3.2.1.2, it is not required, SR 3.2.1.1 along with the COLR will dictate evaluation of $F_Q(Z)$ based on the method used. Changed Condition C to reference $F_Q(Z)$. Deleted ITS Inserts 1, 2, 3, and 4 since these inserts are no longer used. Revised ITS Bases as necessary to reflect the ITS changes. 	M
3.2.2	Nuclear Enthalpy Rise Hot Channel Factor		
3.2.3	Axial Flux Difference	<ul style="list-style-type: none"> LCO Changed to be consistent with the ISTS by moving "within a +/- 2% or +/- 3% target band about the target flux difference during Base Load Operation" to the COLR. Added DOC LA03. 	LA
3.2.4	Quadrant Power Tilt Ratio		

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3.3	Instrumentation		
3.3.1	RTS	<ul style="list-style-type: none"> Deleted Notes deviating from ISTS from SR 3.3.1.2, SR 3.3.1.3, and SR 3.3.1.6. Neutron detectors exclusion from CHANNEL CALIBRATION Note is covered in ITS SR 3.3.1.9. Updated CTS pages and ITS Bases markup pages to reflect the deletion. Moved Footnote *** regarding limit switch on Turbine Stop Valve RTS trip to ITS Bases (Function 15.b). Added DOC LA12 and updated CTS markup pg. 2-8 and 2-9 	<p>NA</p> <p>LA</p>
3.3.2	ESFAS	<ul style="list-style-type: none"> Notes rewritten to align more closely with ISTS. Deleted Note that Alarms do not have to be tested; not needed because of the definition of OPERABLE. Deleted text in Table 3.3-2 ACTION 21 stating ACTION required by Specification 3.7.1.5. Unnecessary because it is redundant to requirements of LCO 3.0.6. Revised Required Action J.2 of ITS 3.3.2 markup Insert 2. Added reference to ITS 3.7.2 (MSIVs) to Bases of Condition J. Revised Notes in ITS 3.3.2 Inserts 4 and 5 consistent with ITS Writer's Guide. Added "and deactivated" to closed when referring to MSIVs and MFIV Auto closure Actuation to DOC, CTS Mu, ITS MU, and Bases MU LO6 revised to add additional justification for 6 hr completion time Revised Function's SRs numbers to match CTS surveillances. 	A
3.3.3	PAM	<ul style="list-style-type: none"> Removed the non-Type 1 Category A Instruments from the TS and relocated them to the TRM consistent with the ISTS. Added five (5) instruments that are either Type 1 or Category A variables in PTN CLB. Revised TS ACTIONS to align more closely with ISTS. 	R M
3.3.4	CREVS Instrumentation	<ul style="list-style-type: none"> Actuation Logic requirements deleted. Added DOC L02. DOC A04 added for addition of Separate Condition Entry Note. Revised DOC A02 to improve discussion of not duplicating sub-function requirements (i.e., SI and CI). 	L A A
3.3.5	LOP EDG Start Instrumentation	<ul style="list-style-type: none"> Converted ITS to be consistent with ISTS. Per bus added to Actions. 	
3.3.6	Containment Ventilation isolation Instrumentation	<ul style="list-style-type: none"> Changed second condition in Conditions A and B from two radiation monitoring channels inoperable... to one required radiation monitoring channel inoperable, since only one of two are required per CTS. Deleted Note to Required Action A.2 since condition would be entered only when both channels are inoperable, thus the Note is unnecessary. Reworded Table 3.3.6-1 Footnote (c) for clarity. Table 3.3.6-1 Action b, "Setpoint may vary according to current plant conditions that the release rate does not exceed allowable limits provided in the ODCM" moved to the Bases. 	<p>A</p> <p>A</p> <p>A M</p>

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3.4	Reactor Coolant System		
3.4.1	RCS, P, T, and Flow DNB Limits		
3.4.2	RCS Minimum Temperature for Criticality		
3.4.3	RCS P/T Limits	<ul style="list-style-type: none"> Relocated Material Property Basis information from the 48 EFPY Heatup and Cooldown Curves from TS to the UFSAR. Added new DOC LA02. Added clarification to JFD so it is clear that PTN is not developing a PTLR. 	LA
3.4.4	RCS Loops-MODES 1 and 2		
3.4.5	RCS Loops-MODES 3	<ul style="list-style-type: none"> ITS Action C and D Markup revised to more closely match NUREG-1431. 	
3.4.6	RCS Loops-MODES 4		
3.4.7	RCS Loops-MODES 5, Loops Filled	Conditions restructured to more closely match ISTS. ITS Bases revised to reflect the change.	A
3.4.8	RCS Loops-MODES 5, Loops Not Filled		
3.4.9	Pressurizer	Added a separate Condition for pressurizer heaters not capable of being powered from an EDG. Revised ITS 3.4.9 Bases to reflect the ITS change.	A
3.4.10	Pressurizer Safety Valves		
3.4.11	PORV Block Valves	Added PORVS back into ITS consistent with CTS.	
3.4.12	OMS	<ul style="list-style-type: none"> Restored CTS wording to isolate high pressure SI flow path to RCS versus ITS wording to verify on SI pump is capable of injecting. Increase Action to vent RCS if PORV inoperable in MODE 4 from 8 hours to 24 hours. Added Required Action D.1 to CTS ACTION a. Added ITS ACTION E for CTS ACTION c actions 2) and 3). 	NA L M

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		<ul style="list-style-type: none"> Removed duplicative frequency wording from CTS 4.4.9.3.2 	A
3.4.13	RCS Operations Leakage	Deleted unnecessary CTS surveillances 4.4.6.2.1.a, .b, and .d.	
3.4.14	RCS PIV Leakage	<ul style="list-style-type: none"> Consistent with the ISTS presentation, moved CTS SR 4.5.2.e.1 to test the RHR System autoclosure interlock from the ECCS Specification (ITS 3.5.2) to RCS PIV Leakage Specification (ITS 3.4.14) because the OPERABILITY of the RHR system is not associated with the autoclosure interlock. The purpose of the autoclosure interlock is to preclude an intersystem LOCA, which is the purpose of ISTS 3.4.14. 	A
		<ul style="list-style-type: none"> The Applicability was expanded to MODE 4 because it supports the accident analysis, consistent with ISTS. 	M
		<ul style="list-style-type: none"> 4 hours allowed to restore inoperable autoclosure interlock versus LCO 3.0.3 entry. 	L
		<ul style="list-style-type: none"> Added the Applicability exception for PIVs in the RHR flowpath when transition to or operating in the RHR cooldown mode. 	L
3.4.15	RCS Leakage Detection Instrumentation	Added an Action to take grab samples when the containment atmosphere gaseous radiation monitor is the only Operable Monitor.	M
3.4.16	RCS Specific Activity		
3.4.17	SG Tube Integrity		
3.5	ECCS		
3.5.1	Accumulators		
3.5.2	ECCS - Operating	<ul style="list-style-type: none"> LCO and ACTIONS restructured to more closely match ISTS. ITS Bases revised to reflect the change. DOCs A04, A05, A06 and A07 are added. Revised to match the Safety Analysis and more closely match the ISTS by requiring 2 ECCS subsystems from unit and 1 ECCS subsystem from opposite unit vs 4 pumps and flow paths in the CTS. Removed Reference to Containment Sump TS from Bases (PTN is not adopting the Containment Sump TS). 	A L
3.5.3	ECCS - Shutdown		

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3.5.4	RWST		
3.6	Containment Systems		
3.6.1	Containment		
3.6.2	Containment Air Locks	CTS markup for SR 4.6.1.3.a will be modified to delete specific reference to a vacuum test of the airlock door seals and refer only to the Containment Leakage Rate Testing Program of ITS 5.5.13. DOC L03 will be created since this change would permit a vacuum test of the door seals or a pressure test of the airlock, either of which would be permitted under the Containment Leakage Rate Testing Program.	L
3.6.3	Containment Isolation Valves	<ul style="list-style-type: none"> Removed "or more" from ITS Action A Note that states "Only applicable with penetration flow paths with two or more CIVs" because PTN does not contain flow paths with more than two CIVs in series. DOC A07 will be modified to remove reference to air locks. 	A
3.6.4	Containment Pressure		
3.6.5	Containment Air Temperature		
3.6.6	CS and Cooling System	<ul style="list-style-type: none"> ITS 3.6.6 DOCs L01 and L05 are modified to include further discussion of containment cooling capability considering an end state of MODE 4. Containment High-2 changed to Containment High-High in Bases. 	
3.6.7	Recirculation pH Control System		
3.7	Plant Systems		
3.7.1	MSSVs	<ul style="list-style-type: none"> Conditions restructured to more closely match ISTS. DOC A05 modified to reflect the restructuring With one or more MSSVs inoperable in MODE 2, only a power reduction is required irrespective of whether MTC is positive, negative, or zero. DOC L01 added. 	A L
3.7.2	MSIVs	Added 'and de-activated' to be consistent with changes made in ITS 3.3.2.	
3.7.3	FIVs and FCVs and Associated Bypass Valves	<ul style="list-style-type: none"> Deleted unnecessary words in CTS 3.7.1.7, Action c, "...in different steam generator flow paths..." Replaced DOC A04 with new DOC A04 explaining why the deleted phrase is unnecessary. 	A

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		<ul style="list-style-type: none"> SR Notes restructured to match ISTS convention. Added 'and de-activated' to be consistent with changes made in ITS 3.3.2 	A
3.7.4	Secondary Specific Activity	SRs rewritten to match ISTS, secondary specific activity retained versus "within limits" Deleted requirement to determine gross radioactivity, retained DEI-131 as in ISTS.	
3.7.5	AFW	<ul style="list-style-type: none"> Revised to align more closely with the ISTS presentation and the PTN safety analysis by requiring 2 AFW trains to be OPERABLE vs 3 AFW trains in CTS. Essentially the third turbine driven AFW train is considered a spare. (CLB single failure analysis assumes one pump out-of-service and then another pump failure). DOCs A02, L01, L02, and L04 have been added with CTS markups revised to reflect these changes. DOC L01 revised to DOC L03 JFD 3 revised to reflect changes to the ISTS markup. New JFD 5 added to justify the addition of proposed ITS ACTION C and proposed Note to ISTS 3.7.5 Condition E (ITS 3.7.5, Condition F). 	L
3.7.6	CST	Notes that the Actions apply to both units deleted because duplicative of LCO 3.0.10 for dual unit TS. Removed in all specifications in PTN ITS.	
3.7.7	CCW System	Revised to match the safety analysis (one pump and two HXs) and more closely match the ISTS by requiring 2 CCW trains to be OPERABLE vs 3 CCW trains in CTS. Essentially the third train is considered a spare. The requirement for two heat exchangers remains unchanged.	L
3.7.8	ICW System	Revised to match the safety analysis and more closely match the ISTS presentation by requiring 2 ICW trains to be OPERABLE vs 3 ICW trains in CTS. Essentially the third train is considered a spare.	L
3.7.9	UHS		
3.7.10	CREVS	Changed to two trains and three AHU's required to be OPERABLE to more closely match the ISTS. AHUs are required support the control room filtration function, three are required to support single failure criterion.	
3.7.11	CREATCS	<ul style="list-style-type: none"> Originally added AHU's to this specification (Condensers); moved back to Ventilation specification (3.7.10). 2 condensing units and 2 AHU's required for this specification per the Bases. Only one AC unit is required to support the control room cooling function. Added 'required' to ITS Conditions referencing OPERABLE CREATCS trains because there are three trains and only two are needed. Deleted ITS Bases insert 2 as it is unnecessary information. 	NA
3.7.12	Fuel Storage Pool Water Level	Revised to require ≥ 23 feet above fuel vs 56' 10" elevation to align more closely with the ISTS.	

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3.7.13	Fuel Storage Pool Boron Concentration		
3.7.14	Spent Fuel Storage	Revised LCO to align more closely with the ISTS.	
3.8	Electrical Power Systems		
3.8.1	AC Sources-Operating	<ul style="list-style-type: none"> Significant changes in ITS from simply reformatting the CTS into the ITS format to aligning the CTS requirements to more closely align with the ISTS and PTN safety analysis. Changed LCO presentation and ACTIONS to define details for opposite unit consistent with industry ITS presentation for dual units. Verifying the diesel generator is aligned to provide standby power to the associated emergency buses is being deleted because it is inherent in the definition of Operability (DOC A09 added). SR 3.8.1.6 addition of the allowance for a prelube period was removed; it does however allow for a warmup period. 	L
3.8.2	AC Sources-Shutdown	<ul style="list-style-type: none"> The addition of "a qualified" when referring to offsite source was removed. DOC M02 was added deleting duplicate Required Actions for low water inventory and ensuring immediate action is taken to restore an inoperable power supply. Add a DOC (L05) to justify deletion of Core Alterations. Added DOC for deletion of footnote that states, "Caution - If the opposite unit is in MODES 1, 2, 3, or 4 see Specification 3.8.1.1." 	M
3.8.3	Diesel Fuel Oil, Lube Oil, and Starting Air	<ul style="list-style-type: none"> Discussion of change M02 is revised to explain this difference and SR 3.8.3.4 is revised similar to Condition E with the required pressure for 5 successive start attempts in the Bases, similar to SR 3.8.3.1 and SR 3.8.3.2. 	L
3.8.4	DC Sources - Operating	Significant changes in ITS from simply reformatting the CTS into the ITS format to aligning the CTS requirements to more closely align with the ISTS and PTN safety analysis. Changed LCO presentation and ACTIONS to define details for opposite unit consistent with industry ITS presentation for dual units.	L
3.8.5	DC Sources - Shutdown		
3.8.6	Battery Parameters		
3.8.7	Inverters – Operating		

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3.8.8	Inverters - Shutdown		
3.8.9	Distribution Systems - Operating	<ul style="list-style-type: none"> Significant changes in ITS from simply reformatting the CTS into the ITS format to aligning the CTS requirements to more closely align with the ISTS and PTN safety analysis. Changed LCO presentation and ACTIONS to define details for opposite unit consistent with industry ITS presentation for dual units. Moved requirements and actions for individual MCCs and individual opposite unit load center inoperabilities to TRM because of the limited number of safety significant loads associated with these AC buses. 	L LA
3.8.10	Distribution Systems - Shutdown		
3.9	Refueling Operations		
3.9.1	Boron Concentration		
3.9.2	Refueling Cavity Water Level		
3.9.3	Nuclear Instrumentation		
3.9.4	Containment Penetrations		
3.9.5	RHR and Coolant Circulation – High Water Level		
3.9.6	RHR and Coolant Circulation – Low Water Level		
3.9	Relocated	Added more detail to the LA DOC that relocated the CTS 3.9.3 Decay Time Spec to the TRM.	
4.0	Design Features		
4.1	Site Location		

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4.2	Reactor Core		
4.3	Fuel Storage	Design requirements removed because they are covered in 3.7.14 where most of the details were already moved.	
5.0	Administration Controls		
5.1	Responsibility		
5.2	Organization	<ul style="list-style-type: none"> ITS 5.2.1.a - Plant specific titles going to QATR or UFSAR vs QATR only because the QATR is a fleet document. Included DOC A06. ITS 5.2.2.e – Removed deviation from ISTS added DOCs A04 and A05. Revised CTS Table 6.2-1 with A04 and A05 	<div>A</div> <div>A</div>
5.3	Unit Staff Qualifications	<ul style="list-style-type: none"> ANSI N18.1-1971 qualification requirement exception for health physics supervisor is included in ITS 5.3.1 instead of a separate ITS 5.3.3 requirement. Relocated CTS 6.3.1.4 and CTS 6.3.2 to the UFSAR and added DOCs LA01 and LA02, respectively, to justify the change. Deleted ISTS 5.3.1 Insert 1 since it is unnecessary. See DOCs A02, LA01, and LA02. 	<div>A</div> <div>LA</div> <div>A</div>
5.4	Procedures		
5.5	Programs and Manuals	<ul style="list-style-type: none"> Revised CTS 6.8.4.h.1 to include the testing Frequency associated with the vacuum test of the airlock door seal instead of referencing the Amendment where the testing interval is defined. Added DOC A09 to justify the change and updated ITS 5.5.13 markup to reflect the change. Deleted ITS 5.5 Insert 4 and restored ITS 5.5.13.d.1 consistent with the ISTS since the CTS information and ISTS information is equivalent. Deleted ITS 5.5 Insert 5 since it is duplicative to the wording in ITS 5.5.15.d. Renumbered remaining Inserts. Revised ITS 5.5 Insert 6 (revised Insert 4) and restored ISTS 5.5.20.d.1 and d.2 (ITS 5.5.17.d.1 and d.2) since information in Insert 6 is equivalent to the information in the ISTS and is not a deviation from the ISTS. Added specific NSHCs in accordance with LIC 601 to cover LA02, which relocated ITS 5.5 periodic Frequencies to the Surveillance Frequency Control Program. 	<div>A</div> <div>A</div> <div>A</div> <div>A</div> <div>A</div>

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5.6	Reporting Requirements	<ul style="list-style-type: none"> Added CTS markup page related to Accident Monitoring as it relates to post accident monitoring reporting. 	A
		<ul style="list-style-type: none"> Revised paragraph in CTS 6.9.1.7 listing parameters to be determined with generic ISTS wording as shown in CTS markup Insert 1. Restored ITS 5.6.3.c in the ITS markup. Added DOC A03 to justify the change. 	A
		<ul style="list-style-type: none"> Deleted ITS markup Insert 3 since it is duplicative of information in Insert 2. 	A
5.7	High Radiation Area		