ATTACHMENT I TO IPN-94-102

Proposed Technical Specification Changes

Associated with the

Allowable Percent of Rated Power for Inoperable Main Steam Safety Valves

and the Correction of Action Statements Associated with

Inoperable Main Steam Line Isolation Instrumentation

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

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If the above action cannot be taken, then:

a) maintain the plant in a safe stable mode which minimizes the potential for a reactor trip,

and

b) continue efforts to restore water supply to the auxiliary feedwater system,

and

c) notify the NRC within 24 hours regarding planned corrective action.

Basis

A reactor shutdown from power requires removal of core decay heat. Immediate decay heat removal requirements are normally satisfied by the steam bypass to the condensers. Thereafter, core decay heat can be continuously dissipated via the steam bypass to the condenser as feedwater in the steam generator is converted to steam by heat absorption. Normally, the capability to feed the steam generators is provided by operation of the turbine cycle feedwater system.

The twenty main steam safety valves have a total combined rated capability of 15,108,000 lbs/hr. The total full power steam flow is 12,974,500 lbs/hr.; therefore twenty (20) main steam safety valves will be able to relieve the total steam flow if necessary. The total relieving capacity of the twenty main steam line safety valves is 116% of the total secondary steam flow at 100% rated power (3025 Mwt). The specified valve lift settings and relieving capacities are in accordance with the requirements of Section III of the ASME Boiler and Pressure Code, 1971 Edition. The operability of the twenty main steam line safety valves ensure that the secondary system pressure will be limited to within 110% of the design pressure of 1085 psig during the most severe anticipated system operational transient.

Startup and/or power operation with inoperable main steam line safety valves is allowable within the limitation of Table 3.4-1. Operation with up to three of the five main steam line safety valves per steam generator inoperable is permissible if the maximum allowed power level is below the heat removing capability of the operable MSSVs. This is accomplished by restricting the reactor power level such that the heat input from the primary side will not exceed the heat removing capability of the operable MSSVs of the most limiting steam generator. The reduction in reactor power level is achieved by reducing the power range neutron flux high setpoint. The reactor trip setpoint reductions are derived on the following basis:

$$Hi\phi = (100 / Q) [(w_s h_{fg} N) / K]$$

Where:

Hiϕ	=	Safety Analysis power range high neutron flux setpoint, percent.
Q	=	Nominal NSSS power rating of the plant (including reactor coolant pump heat) in Mwt (3037 Mwt).
K	=	Conversion factor, 947.82 $\frac{(Btu/sec)}{Mwt}$
w_s	=	Minimum total steam flow rate capability of the operable MSSVs on any one steam generator at the highest MSSV opening pressure, including tolerance and accumulation, as appropriate, in lb/sec. (w_s = 150 + 228.61 * (4 - V) lb/sec, where V = Number of inoperable safety valves in the steam line of the most limiting steam generator).
h_{fg}	=	Heat of vaporization for steam at the highest MSSV opening pressure including tolerance and accumulation, as appropriate, Btu/lbm (608.5 Btu/lbm).
N	=	Number of loops in plant (4).

In the unlikely event of complete loss of electrical power to the station, decay heat removal would continue to be assured by the availability of either the steam-driven auxiliary feedwater pump or one of the two motor-driven auxiliary steam generator feedwater pumps and steam discharge to the atmosphere via the main steam safety valves and atmospheric relief valves. One motor-driven auxiliary feedwater pump can supply sufficient feedwater for removal of decay heat from the plant. The minimum amount of water in the condensate storage tank is the amount needed for 24 hours at hot shutdown. When the condensate storage supply is exhausted, city water will be used.

Two steam generators capable of performing their heat transfer function will provide sufficient heat removal capability to remove core decay heat after a reactor shutdown.

The limitations placed on turbine-generator electrical output due to conditions of turbine overspeed setpoint, number of operable steam dump lines, and condenser back pressure are established to assure that turbine overspeed (during conditions of loss of plant load) will be within the design overspeed value considered in the turbine missile analysis. [2] In the preparation of Figures 3.4-1 and 3.4-2, the specified number of operable L.P. steam dump lines is shown as one (1) greater than the minimum number required to act during a plant trip. The limitations on electrical output, as indicated in Figures 3.4-1 and 3.4-2, thus consider the required performance of the L.P. Steam Dump System in the event of a single failure for any given number of operable dump lines.

TABLE 3.4-1

MAXIMUM ALLOWABLE POWER RANGE NEUTRON FLUX HIGH SETPOINT WITH INOPERABLE STEAM LINE SAFETY VALVES	
Number of Inoperable Safety Valves Per Limiting Steam Generator*	Maximum Allowable Power Neutron Flux High Set-Point (Percent of Rated Power)
1	61
2	42
3	23

*Limiting Steam Generator is that Generator with greatest number of inoperable safety valves.

Amendment No. 97,

INSTRUMENTATION OPERATING CONDITION FOR ENGINEERED SAFETY FEATURES

No. FUNCTIONAL UNIT	1 NO. OF CHANNELS	2 NO. OF CHANNELS TO TRIP	3 MIN. NUMBER OF OPERABLE CHANNELS	4 MIN. DEGREE OF REDUNDANCY	5 OPERATOR ACTION IF CONDITIONS OF COL. 3 OR 4 CANNOT BE MET (Note 6)
2. CONTAINMENT SPRAY					
a. Manual	2	2	2	0 (Note 4)	Cold Shutdown
b. High Containment Pressure (Hi Hi Level)	2 sets of 3	2 of 3 in each set	2 per set	1/set	Cold Shutdown (Note 8)
3. AUXILIARY FEEDWATER					
a. Stm. Gen. Water Level-Low-Low					
i. Start Motor Driven Pumps	3/stm. gen.	2 in any stm. gen.	2 chan. in each stm. gen.	1	Reduce system temperature such that $T \leq 350°F$
ii. Start Turbine-Driven Pump	3/stm. gen.	2/3 in each of 2 stm. gen.	2 chan. in each stm. gen.	1	$T \leq 350°F$
b. S.I. Start Motor-Driven Pumps	(All	safety	injection	initiating	functions and requirements)
c. Station Blackout Start Turbine-Driven Pump	2	1	1	0	$T \leq 350°F$
d. Trip of Main Feedwater Pumps Start Motor-Driven Pumps	2	1	1	0	Hot Shutdown

TABLE 3.5-3 (Sheet 3 of 3)

INSTRUMENTATION OPERATING CONDITION FOR ENGINEERED SAFETY FEATURES

No. FUNCTIONAL UNIT	1 NO. OF CHANNELS	2 NO. OF CHANNELS TO TRIP	3 MIN. NUMBER OF OPERABLE CHANNELS	4 MIN. DEGREE OF REDUNDANCY	5 OPERATOR ACTION IF CONDITIONS OF COL. 3 OR 4 CANNOT BE MET (Note 6)
4. LOSS OF POWER					
a. 480v Bus Undervoltage Relay	2/bus	1/bus	1/bus	0	See Note 1
b. 480v Bus Degraded Voltage Relay	2/bus	2/bus	2/bus (See Note 2)	0	See Note 1
5. OVERPRESSURE PROTECTION SYSTEM (OPS)	3	2	2	1	See Note 7

Note 1. If the 138KV and 13.8KV sources of offsite power are available and the conditions of column 3 or 4 cannot be met within 72 hours, then the requirements of 3.7.C.1 or 2 shall be met.

Note 2. If one channel becomes inoperable, it is placed in the trip position and the minimum number of operable channels is reduced by one.

Note 3. Permissible to bypass if reactor coolant pressure is less than 2000 psig.

Note 4. Must actuate 2 switches simultaneously.

Note 5. The Minimum Number of Operable Channels and the Minimum Degree of Redundancy may be reduced to zero if the SI bypass is in the unblocked position.

Note 6. If the condition of Column 3 or 4 cannot be met, the reactor shall be placed in the hot shutdown condition, utilizing normal operating procedures, within 4 hours of the occurrence. If the conditions are not met within 24 hours of the occurrence, the reactor shall be placed in the cold shutdown condition, or the alternate condition, if applicable, within an additional 24 hours.

Note 7. Refer to Specification 3.1.A.8.

Note 8. Main steam isolation valves may be closed in lieu of going to cold shutdown if the circuitry associated with closing the valves is the only portion inoperable.

TABLE 3.5-4 (Sheet 1 of 2)

INSTRUMENT OPERATING CONDITIONS FOR ISOLATION FUNCTIONS

No. FUNCTIONAL UNIT	1 NO. OF CHANNELS	2 NO. OF CHANNELS TO TRIP	3 MIN. OPERABLE CHANNELS	4 MIN. DEGREE OF REDUNDANCY	5 OPERATOR ACTION IF CONDITIONS IN COLUMN 3 OR 4 CANNOT BE MET
1. CONTAINMENT ISOLATION					
a. Automatic Safety Injection (Phase A)	See Item	No. 1(b)	of Table	3.5-3	Cold Shutdown (see note 1)
b. Containment Pressure (Phase B)	See Item	No. 2(b)	of Table	3.5-3	Cold Shutdown (see note 1)
c. Manual					
Phase A	2	1	1	0	Cold Shutdown (see note 1)
Phase B	See Item	No. 2(a)	of Table	3.5-3	Cold Shutdown (see note 1)
2. STEAM LINE ISOLATION					
a. High Steam Flow in 2/4 Steam Lines Coincident with Low T_{avg} or Low Steam Line Pressure	See Item	No. 1(e)	of Table	3.5-3	Cold Shutdown or Main Steam Isolation Valves Closed (see note 1)
b. High Containment Pressure (Hi Hi Level)	See item	No. 2(b)	of Table	3.5-3	Cold Shutdown (see notes 1 and 2)
c. Manual	1/loop	1/loop	1/loop	0	Cold Shutdown or Main Steam Isolation Valves Closed (see note 1)

TABLE 3.5-4 (Sheet 2 of 2)

No. FUNCTIONAL UNIT	1 NO. OF CHANNELS	2 NO. OF CHANNELS TO TRIP	3 MIN. OPERABLE CHANNELS	4 MIN. DEGREE OF REDUNDANCY	5 OPERATOR ACTION IF CONDITIONS IN COLUMN 3 OR 4 CANNOT BE MET
3. FEEDWATER LINE ISOLATION					
a. Safety Injection	See	Item	No. 1	of	Table 3.5-3
4. CONTAINMENT VENT AND PURGE					
a. Containment Radioactivity High (R11 and R12 monitor)	2	1	1	0	close all containment vent and purge valves when above cold shutdown
5. PLANT EFFLUENT RADIOIODINE/PARTICULATE SAMPLING (sample line common with monitor R13)	1	NA	1	0	(see note 3)
6. Main Steam Line Radiation Monitors	1/line	NA	1/line	0	(see note 3)
7. Wide Range Plant Vent Monitor (R27)	1	NA	1	0	(see note 3)

NOTES

1. If the conditions of Columns 3 or 4 cannot be met, the reactor shall be placed in the hot shutdown condition, utilizing normal operating procedures, within 4 hours of the occurrence. If the conditions are not met within 24 hours of the occurrence, the reactor shall be placed in the cold shutdown condition, or the alternate condition if applicable, within an additional 24 hours.

2. Main steam isolation valves may be closed in lieu of going to cold shutdown if the circuitry associated with closing the valves is the only portion inoperable.

3. If the plant vent sampling capability, the wide-range vent monitor or the main steam line radiation monitors is/are: determined to be inoperable when the reactor is above the cold shutdown condition, then restore the sampling/monitoring capability within 72 hours or:
   a) Initiate a pre-planned alternate sampling/monitoring capability as soon as practical, but no later than 72 hours after identification of the failures. If the capability is not restored to operable status within 7 days, then,
   b) Submit a Special Report to the NRC pursuant to Technical Specification 6.9.2 within 14 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system.

ATTACHMENT II TO IPN-94-102

Safety Evaluation of Technical Specification Changes

Associated with the

Allowable Percent of Rated Power for Inoperable Main Steam Safety Valves

and the Correction of Action Statements Associated with

Inoperable Main Steam Line Isolation Instrumentation

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

Safety Evaluation of Technical Specification Changes Associated with the Allowable Percent of Rated Power for Inoperable Main Steam Safety Valves and the Correction of Action Statements Associated with Inoperable Main Steam Line Isolation Instrumentation

Section I - Description of Changes

This application for amendment to the Indian Point Unit 3 (IP3) Technical Specifications proposes to revise Sections 3.4 and 3.5 of Appendix A of the Operating License. The proposed revisions to Technical Specification Section 3.4 would reduce the maximum allowable percent of rated power associated with inoperable Main Steam Safety Valves. These proposed changes would reflect a revised assumption for calculating the maximum allowable percent of rated power associated with inoperable Main Steam Safety Valves. The proposed revisions to Technical Specification Section 3.5 correct administrative errors introduced by License Amendment 44, dated May 10, 1982, and clarify the action statements associated with inoperable high containment pressure (Hi-Hi Level) instrumentation.

Section II - Evaluation of Changes

Allowable Percent of Rated Power for Inoperable Main Steam Safety Valves

Technical Specification 3.4.A.1.a allows the plant to operate at a reduced power level with a reduced number of operable Main Steam Safety Valves (MSSVs). The reduced power level associated with 1, 2, and 3 inoperable MSSVs per limiting steam generator is provided by Technical Specification Table 3.4-1. Westinghouse identified a deficiency in the basis for the power levels in Technical Specification Table 3.4-1. The deficiency is in the assumption that the maximum allowable initial power level is a linear function of the available MSSV relief capacity. The linear function is identified in the Bases of Section 3.4 and is provided below:

$$SP = \frac{(X) - (Y)(V)}{X} \times (109)$$

Where:

SP = Reduced reactor trip setpoint in percent of rated power

V = Number of inoperable safety valves per steam line (most limiting steam generator)

(109)= Power Range Neutron Flux-High Trip Setpoint for (4) loop operation

X = Total relieving capacity of all safety valves per steam line (3,777,000 lbs/hr)

Y = Maximum relieving capacity of any one safety valve (823,000 lbs/hr).

Under certain conditions and with typical safety analysis assumptions, a Loss of Load/Turbine Trip (LOL/TT) transient from partial power conditions may result in overpressurization of the main steam system when operating in accordance with this Technical Specification.

The LOL/TT event is analyzed in the FSAR to show that core protection margins are maintained, the Reactor Coolant System (RCS) will not overpressurize, and the main steam system will not overpressurize. The analysis assumes an immediate loss of steam relieving capability through the turbine and coincident loss of all main feedwater. No credit is taken for the direct reactor trip on turbine trip, since this trip would not be actuated for the case of a loss of steam load. Rather, the transient is terminated by a reactor trip on high pressurizer pressure, overtemperature ΔT, or low steam generator water level. Secondary side overpressure protection is provided by actuation of the MSSVs. The analysis verifies that the MSSV capacity is sufficient to prevent secondary side pressure from exceeding 110 percent of the design pressure.

The FSAR only analyzes the LOL/TT transient from the full power initial condition, with cases examining the effects of assuming primary side pressure control and different reactivity feedback conditions. With fully operational MSSVs, it can be demonstrated that overpressure protection is provided for all initial power levels. However, Technical Specification 3.4.A.1.a allows operation with a reduced number of operable MSSVs at a reduced power level as determined by resetting the power range high neutron flux setpoint. This Technical Specification is not based on a detailed analysis, but rather on the assumption that the maximum allowable initial power level is a linear function of the available MSSV relief capacity. Recently, Westinghouse has determined that this assumption is not valid.

The problem is that if main feedwater is lost, a reactor trip is necessary to prevent secondary side overpressurization for all postulated core conditions. At high initial power levels a reactor trip is actuated early in the transient as a result of either high pressurizer pressure or overtemperature ΔT. The reactor trip terminates the transient and the MSSVs maintain steam pressure below 110 percent of the design value.

At lower initial power levels a reactor trip may not be actuated early in the transient. An overtemperature ΔT trip isn't generated since the core thermal margins are increased at lower power levels. A high pressurizer pressure trip isn't generated if the primary pressure control systems function normally. This results in a longer time during which primary heat is transferred to the secondary side. The reactor eventually trips on low steam generator water level, but this may not occur before steam pressure exceeds 110 percent of the design value if one or more MSSVs are inoperable in accordance with the current Technical Specification.

This proposed technical specification change would modify Table 3.4-1 and the associated basis such that the maximum power level allowed for operation with inoperable MSSVs is below the heat removing capability of the operable MSSVs. The new algorithm used to calculate the maximum power levels associated with inoperable MSSVs would be:

$$Hi\phi = (100 / Q) [(w_s h_{fg} N) / K]$$

Where:

Hiø = Safety Analysis power range high neutron flux setpoint, percent

Q = Nominal NSSS power rating of the plant (including reactor coolant pump heat) in Mwt (3037 Mwt).

K = Conversion factor, 947.82 $\frac{(Btu/sec)}{Mwt}$

w_s = Minimum total steam flow rate capability of the operable MSSVs on any one steam generator at the highest MSSV opening pressure, including tolerance and accumulation, as appropriate, in lb/sec. (w_s = 150 + 228.61 * (4 - V) lb/sec, where V = Number of inoperable safety valves in the steam line of the most limiting steam generator).

h_{fg} = Heat of vaporization for steam at the highest MSSV opening pressure including tolerance and accumulation, as appropriate, Btu/lbm (608.5 Btu/lbm).

N = Number of loops in plant (4).

This algorithm ensures that the heat removing capability of the operable MSSVs will exceed the heat produced at the maximum power levels allowed for operation with inoperable MSSVs. Using this algorithm, the following table provides the maximum allowed power range high neutron flux setpoint associated with 1, 2, or 3 inoperable MSSVs per limiting Steam Generator:

Number of Inoperable MSSVs Per Limiting Steam Generator	Maximum Allowable Power Range High Neutron Flux Setpoint, Percent of Rated Power
1	61
2	42
3	23

These maximum allowable power levels are below those currently allowed by the Technical Specifications. The proposed changes to Technical Specification Table 3.4-1 incorporate the above power levels. Currently the technical specifications allow the maximum power levels associated with 1, 2, and 3 inoperable MSSVs per limiting steam generator to be 85 percent, 61 percent, and 37 percent, respectively. Therefore, the proposed technical specification change will be more conservative than the current technical specifications.

Correction of Administrative Errors and Clarification of Table 3.5-4

In addition to revising the allowable percent of rated power associated with inoperable Main Steam Safety Valves, this application corrects the administrative errors in the action statements (Column 5) associated with Items 2.a and 2.c of Table 3.5-4 and clarifies the action statements associated with Item 2.b of Table 3.5-4 and Item 2.b of Table 3.5-3.

Administrative errors to Table 3.5-4 were introduced by License Amendment 44, dated May 10, 1982. License Amendment 44 approved the proposed Technical Specifications that were submitted to the NRC in response to a requirement that each operating nuclear power plant install additional radioactive effluent monitoring equipment. As part of the submittal to install additional radioactive effluent monitoring equipment, NYPA reformatted Table 3.5-4. However, during the reformatting of the Table, NYPA inadvertently changed the text in Column 5 of Items 2.a, 2.b, and 2.c to read "Cold Shutdown *and* Main Steam Isolation Valves Closed" instead of the previous "Cold Shutdown *or* Main Steam Isolation Valves Closed." This change was not associated with the subject matter of Amendment 44 and was therefore an inadvertent change to the Technical Specifications. This error was introduced due to the poor copy quality of Table 3.5-4 when it was issued as part of Amendment 26. In Amendment 26, only part of column 5 was copied onto the page; the other part of the column was cut off the page. When submitting technical specification changes associated with Amendment 44, the Authority incorrectly assumed that Column 5 was supposed to say "Cold Shutdown *and* Main Steam Isolation Valves Closed."

The current requirements of Items 2.a and 2.c of Technical Specification Table 3.5-4 (i.e. that the plant be placed in the cold shutdown condition *and* that the MSIVs be closed within the 24 hour period following the initial hot shutdown period) place an undue restriction on the plant. If the minimum number of operable channels or the minimum degree of redundancy requirements for instrumentation associated with Items 2.a or 2.c can not be met, then, after the plant is in the hot shutdown condition, it is sufficient to either go to cold shutdown *or* to close the MSIVs. The reason it is sufficient to go to cold shutdown without closing the MSIVs is because, in the cold shutdown condition, a steam line break is not assumed to occur. Since a steam line break is not assumed to occur during cold shutdown, steam line break protection is not required. Therefore, there is no need to maintain the MSIVs in the closed position. The reason it is sufficient to close the MSIVs and remain in the hot shutdown condition, without going to cold shutdown, is because, with the MSIVs closed, a steam line break is unlikely to occur downstream of the MSIVs. Even if a steam line break did occur downstream of the MSIVs the break would not cause a reduction of reactor coolant temperature or pressure. Therefore, placing the plant in the hot shutdown condition with the MSIVs closed will protect the plant from the effects of a steam line break occurring downstream of the MSIVs. In the hot shutdown condition with the MSIVs closed, the affects of a steam line break occurring upstream of the MSIVs would continue to be mitigated by the instrumentation designed to detect such breaks, including: 1) high differential pressure between steam lines instrumentation, 2) high containment pressure instrumentation, and 3) low pressurizer pressure instrumentation. Therefore, the proposed changes to Items 2.a and 2.c of Table 3.5-4 would restore the original intent of the specifications and remove undue restrictions on the plant.

Proposed changes to Item 2.b of Table 3.5-3 and Item 2.b of Table 3.5-4 will make it more clear that, if the minimum number of operable channels or the minimum degree of redundancy requirements for instrumentation associated with high containment pressure (Hi-Hi level) can not be met, then the plant will be placed in the cold shutdown condition unless the only portion of the instrumentation that can not meet the minimum requirements is the circuitry associated with closing the MSIVs.

Section III - No Significant Hazards Evaluation

Consistent with the criteria of 10 CFR 50.92, the enclosed application is judged to involve no significant hazards based on the following information:

(1) Does the proposed license amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response:

The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. This proposed technical specification change would modify Table 3.4-1 and the associated basis such that the maximum power level allowed for operation with inoperable MSSVs is below the heat removing capability of the operable MSSVs. This proposed technical specification change will be more conservative than the current technical specifications. Proposed changes to Items 2.a and 2.c of Table 3.5-4 would restore the original intent of the specifications and remove undue restrictions on the plant. Proposed changes to Item 2.b of Table 3.5-3 and Item 2.b of Table 3.5-4 clarify the action statements associated with inoperable high containment pressure (Hi-Hi Level) instrumentation.

(2) Does the proposed license amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response:

The proposed license amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed change incorporates more conservative limits on the maximum power level allowed for operation with inoperable MSSVs, restores the original intent of items 2.a and 2.c of Table 3.5-4, and clarifies action statements associated with item 2.b of Table 3.5-3 and item 2.b of Table 3.5-4.

(3) Does the proposed amendment involve a significant reduction in a margin of safety?

Response:

The proposed amendment would not involve a significant reduction in a margin of safety. This proposed technical specification change would modify Table 3.4-1 and the associated basis such that the maximum power level allowed for operation with inoperable MSSVs is below the heat removing capability of the operable MSSVs. This proposed technical specification change will be more conservative than the current technical specifications. Proposed changes to Items 2.a and 2.c of Table 3.5-4 would restore the original intent of the specifications and remove undue restrictions on the plant. Proposed changes to Item 2.b of Table 3.5-3 and Item 2.b of Table 3.5-4 clarify the action statements associated with inoperable high containment pressure (Hi-Hi Level) instrumentation.

Section IV - Impact of Changes

These changes will not adversely affect the following:

ALARA Program
Security and Fire Protection Programs
Emergency Plan
FSAR or SER Conclusions
Overall Plant Operations and the Environment

Section V - Conclusions

The incorporation of these changes: a) will not increase the probability nor the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the Safety Analysis Report; b) will not increase the possibility for an accident or malfunction of a different type than any evaluated previously in the Safety Analysis Report; c) will not reduce the margin of safety as defined in the bases for any technical specification; d) does not constitute an unreviewed safety question; and e) involves no significant hazards considerations as defined in 10 CFR 50.92.

Section VII - References

a) IP3 FSAR
b) IP3 SER
c) NSAL-94-001, dated January 20, 1994, "Operation at Reduced Power Levels with Inoperable Main Steam Safety Valves."
d) IP3-CALC-NIS-01070, Rev. 0, "Plant Operation at Reduced Power Levels with Inoperable Main Steam Safety Valves."