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W3F1-2017-0034

April 5, 2017

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Subject: Core Operating Limits Report – Cycle 21 Revision 1
Waterford Steam Electric Station, Unit 3
Docket No. 50-382
License No. NPF-38

Dear Sir or Madam:

Waterford 3 Core Operating Limits Report for Cycle 21 was revised to change the note on COLR Tables 1 through 5 regarding how charging pumps are verified to be inoperable.

If you have any questions concerning this submittal, please contact John P. Jarrell, Regulatory Assurance Manager, at (504) 739-6685.

There are no new commitments contained in this submittal.

Sincerely,

JPJ/lem

Attachment: Waterford 3 Core Operating Limits Report Cycle 21 Revision 1

cc: Mr. Kriss Kennedy
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
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Attachment to

W3F1-2017-0034

Waterford 3 Core Operating Limits Report
Cycle 21 Revision 1

(Attachment contains 40 pages)

ENTERGY OPERATIONS

WATERFORD 3

CORE OPERATING LIMITS REPORT

FOR CYCLE 21

REVISION 1

WATERFORD 3

CORE OPERATING LIMITS REPORT
CYCLE 21, REVISION 1

LIST OF EFFECTIVE PAGES	
Revision 0	Pages 1-6, COLR 3/4 1-1, 1-3, 1-4, 1-15, 1-18, 1-25, 2-1, 2-4, 2-6, 2-12, 9-1, and Pages 38 – 40

LIST OF EFFECTIVE FIGURE PAGES	
Revision 0	COLR 3/4 1-3A, 1-4A, 1-18A, 1-25A, 1-25B, 2-1A, 2-1B, 2-6A, 2-6B, 2-6C, 2-6D, 2-6E, 2-6F, 2-6G, 2-6H

LIST OF TABLES PAGE

LIST OF EFFECTIVE TABLE PAGES	
Revision 1	COLR 3/4 1-15A through COLR 3/4 1-15E

WATERFORD 3

CORE OPERATING LIMITS REPORT
CYCLE 21, REVISION 1

I. INTRODUCTION

This CORE OPERATING LIMITS REPORT (COLR) has been prepared in accordance with the requirements of Waterford 3 Technical Specification 6.9.1.11 for Waterford 3 Cycle 21. The core operating limits have been developed using the NRC approved methodologies specified in Section III. This is Revision 1 of the Cycle 21 COLR.

The major changes between the Cycle 21, Revision 1, COLR and the Cycle 21, Revision 0, COLR are listed below:

Tables 1-5 were revised to allow use of the Flex Transfer Switches, or the Charging Pumps Breakers, to isolate power from the Charging Pumps when being removed from service for TS 3.1.2.9 compliance.

II. AFFECTED TECHNICAL SPECIFICATIONS

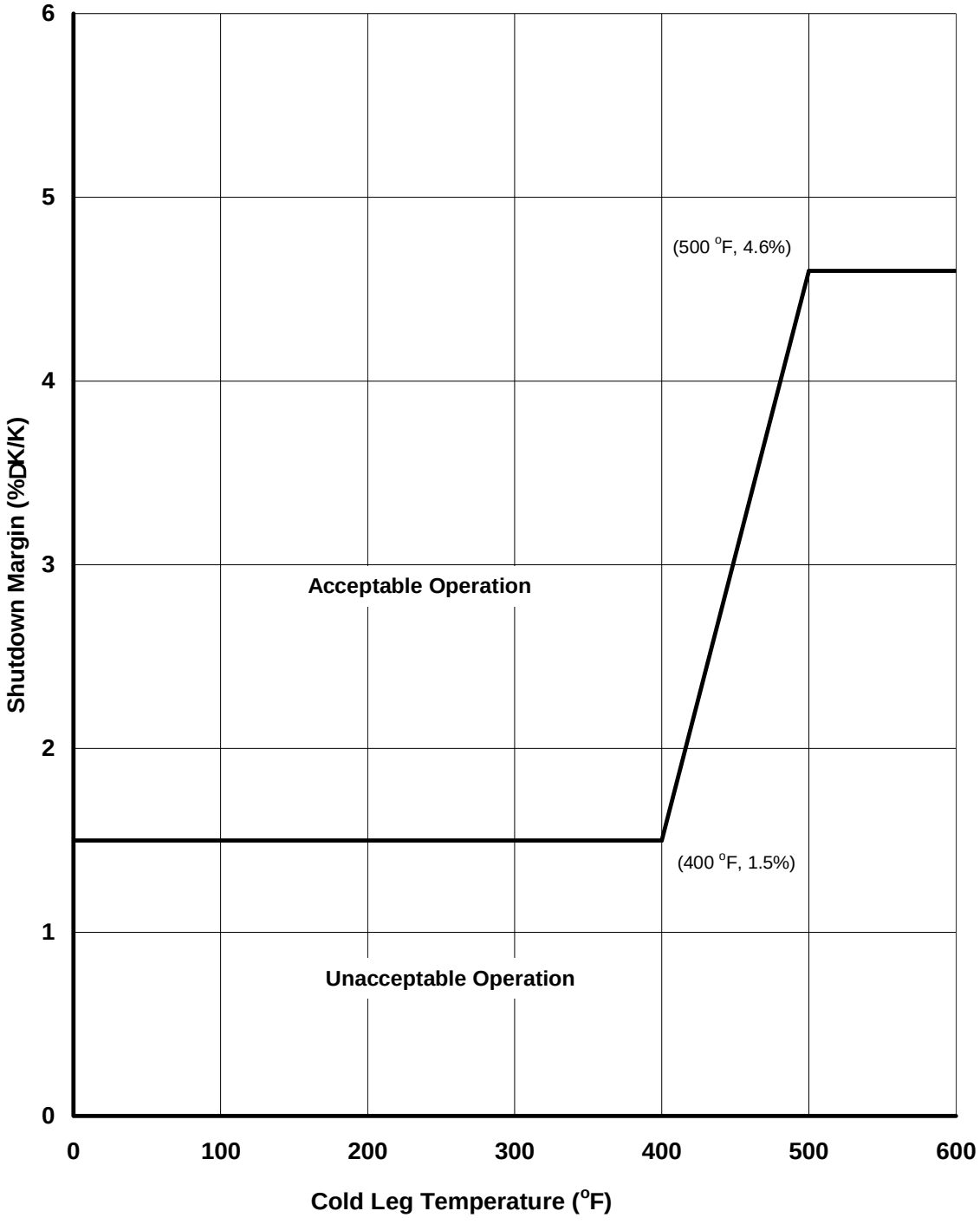
CORE OPERATING LIMITS REPORT

SHUTDOWN MARGIN - ANY CEA WITHDRAWN

3.1.1.1 The SHUTDOWN MARGIN shall be greater than or equal to 5.15% Dk/k when T_{avg} is greater than 200 °F or 2.0% Dk/k when T_{avg} is less than or equal to 200 °F.

3.1.1.2 The SHUTDOWN MARGIN shall be maintained within the region of acceptable operation of COLR Figure 1.

Shutdown Margin Versus Cold Leg Temperature
(All CEAs Fully Inserted)



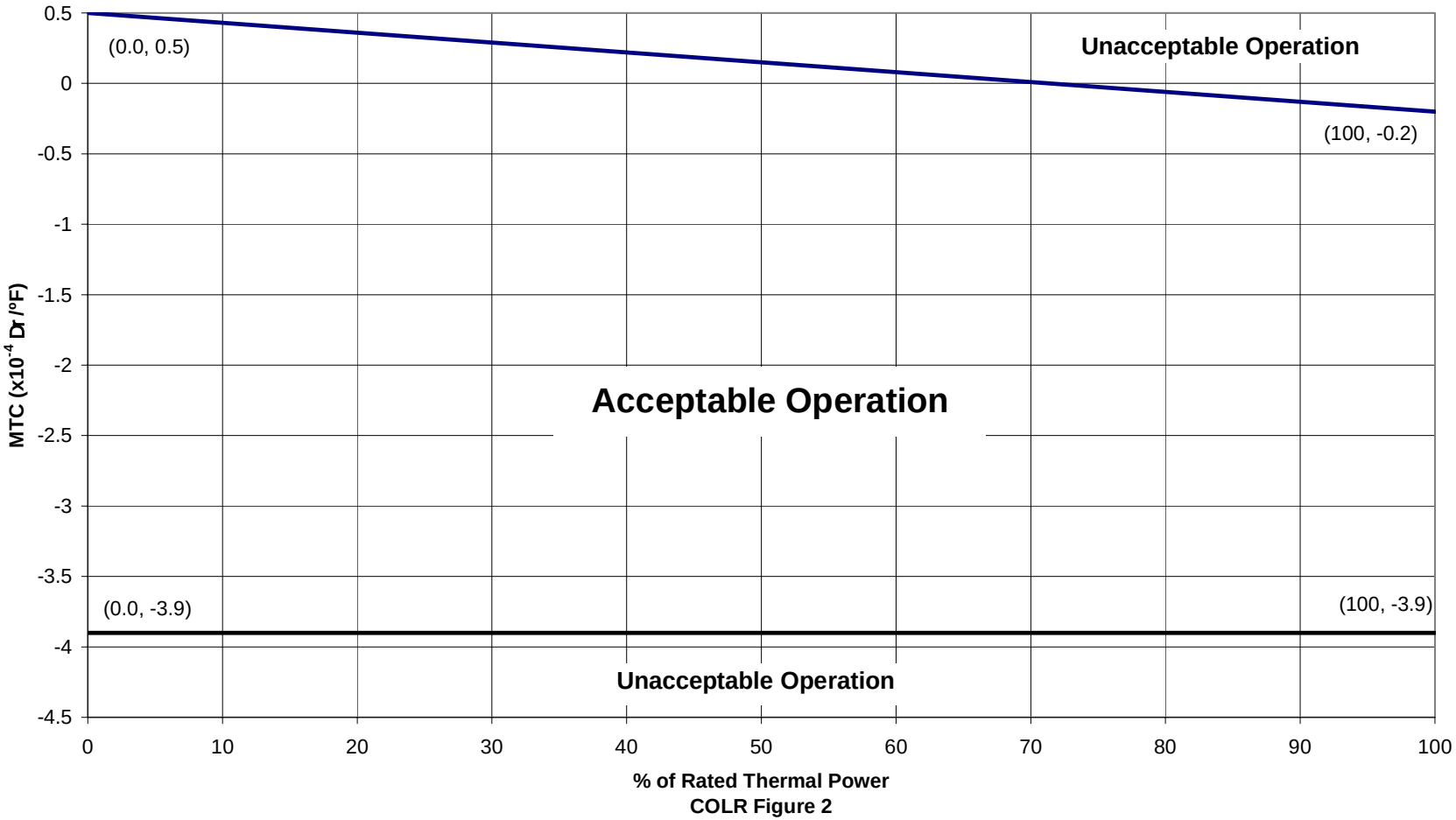
COLR Figure 1

CORE OPERATING LIMITS REPORT

MODERATOR TEMPERATURE COEFFICIENT

3.1.1.3 The Moderator Temperature Coefficient (MTC) shall be maintained within the region of acceptable operation of COLR Figure 2.

Moderator Temperature Coefficient Versus % of Rated Thermal Power



COLR Figure 2

CORE OPERATING LIMITS REPORT

BORON DILUTION

3.1.2.9 See COLR Tables 1 through 5 for required RCS boron concentration monitoring frequencies and Charging Pump operation limits.

SURVEILLANCE REQUIREMENTS

Each required boron dilution alarm shall be adjusted to less than or equal to 1.75 times (1.75x) the existing neutron flux (cps) at the following frequencies:

a. No sooner than one half hour after shutdown and no later than 1 hour after shutdown.

b. At least once per one-half (1/2) hour if the reactor has been shut down $\geq$ 0.5 hour but < 2 hours

c. At least once per hour if the reactor has been shutdown $\geq$ 2 hours but < 10 hours.

d. At least once per 5 hours if the reactor has been shut down $\geq$ 10 hours but < 25 hours.

e. At least once per 24 hours if the reactor has been shut down $\geq$ 25 hours but < 21 days.

f. At least once per 7 days, if the reactor has been shutdown ≥21 days.

COLR TABLE 1

REQUIRED MONITORING FREQUENCIES FOR BACKUP BORON DILUTION DETECTION AS A FUNCTION OF OPERATING CHARGING PUMPS AND PLANT OPERATIONAL MODES FOR K_{eff} GREATER THAN 0.98

$K_{eff} > 0.98$

OPERATIONAL MODE	Number of Operating Charging Pumps* 0	1	2	3
3	12 hours	0.75 hours	Operation not allowed **	
4	12 hours	Operation not allowed **		
5 RCS filled	8 hours	Operation not allowed **		
5 RCS partially drained	8 hours	Operation not allowed **		
6	Operation not allowed **			

* Charging pump OPERABILITY for any period of time shall constitute OPERABILITY for the entire monitoring frequency.

** The precluded number of charging pumps shall be verified to be inoperable by removing power to their motors (breaker racked out or transfer switch transferred).

COLR TABLE 2

REQUIRED MONITORING FREQUENCIES FOR BACKUP BORON DILUTION DETECTION AS A FUNCTION OF OPERATING CHARGING PUMPS AND PLANT OPERATIONAL MODES FOR K_{eff} GREATER THAN 0.97 AND LESS THAN OR EQUAL TO 0.98

$0.98 \geq K_{eff} > 0.97$

OPERATIONAL MODE	Number of Operating Charging Pumps* 0	1	2	3
3	12 hours	2.0 hours	0.5 hours	Operation not allowed**
4	12 hours	0.75 hours	Operation not allowed**	
5 RCS filled	8 hours	0.75 hours	Operation not allowed**	
5 RCS partially drained	8 hours	0.5 hours	Operation not allowed**	
6	Operation not allowed**			

* Charging pump OPERABILITY for any period of time shall constitute OPERABILITY for the entire monitoring frequency.

** The precluded number of charging pumps shall be verified to be inoperable by removing power to their motors (breaker racked out or transfer switch transferred).

COLR TABLE 3

REQUIRED MONITORING FREQUENCIES FOR BACKUP BORON DILUTION DETECTION AS A FUNCTION OF OPERATING CHARGING PUMPS AND PLANT OPERATIONAL MODES FOR K_{eff} GREATER THAN 0.96 AND LESS THAN OR EQUAL TO 0.97

$0.97 \geq K_{eff} > 0.96$

OPERATIONAL MODE	Number of Operating Charging Pumps* 0	1	2	3
3	12 hours	3.0 hours	1.25 hours	0.5 hours
4	12 hours	1.5 hours	Operation not allowed**	
5 RCS filled	8 hours	1.5 hours	Operation not allowed**	
5 RCS partially drained	8 hours	0.75 hours	Operation not allowed**	
6		Operation not allowed**		

* Charging pump OPERABILITY for any period of time shall constitute OPERABILITY for the entire monitoring frequency.

** The precluded number of charging pumps shall be verified to be inoperable by removing power to their motors (breaker racked out or transfer switch transferred).

COLR TABLE 4

REQUIRED MONITORING FREQUENCIES FOR BACKUP BORON DILUTION DETECTION AS A FUNCTION OF OPERATING CHARGING PUMPS AND PLANT OPERATIONAL MODES FOR K_{eff} GREATER THAN 0.95 AND LESS THAN OR EQUAL TO 0.96

$0.96 \geq K_{eff} > 0.95$

OPERATIONAL MODE	Number of Operating Charging Pumps* 0	1	2	3
3	12 hours	4.0 hours	2.0 hours	1.0 hours
4	12 hours	2.25 hours	0.75 hours	Operation not allowed**
5 RCS filled	8 hours	2.0 hours	0.75 hours	Operation not allowed**
5 RCS partially drained	8 hours	2.0 hours	0.5 hours	Operation not allowed**
6		Operation not allowed**		

* Charging pump OPERABILITY for any period of time shall constitute OPERABILITY for the entire monitoring frequency.

** The precluded number of charging pumps shall be verified to be inoperable by removing power to their motors (breaker racked out or transfer switch transferred).

COLR TABLE 5

REQUIRED MONITORING FREQUENCIES FOR BACKUP BORON DILUTION DETECTION AS A FUNCTION OF OPERATING CHARGING PUMPS AND PLANT OPERATIONAL MODES FOR K_{eff} LESS THAN OR EQUAL TO 0.95

K_{eff} £0.95

OPERATIONAL MODE	Number of Operating Charging Pumps* 0	1	2	3
3	12 hours	5.0 hours	2.0 hours	1.0 hours
4	12 hours	2.75 hours	1.0 hours	Operation not allowed**
5 RCS filled	8 hours	3.0 hours	1.0 hours	0.5 hours
5 RCS partially drained	8 hours	2.5 hours	0.75 hours	Operation not allowed**
6	24 hours	2.25 hours	0.5 hours	Operation not allowed**

* Charging pump OPERABILITY for any period of time shall constitute OPERABILITY for the entire monitoring frequency.

** The precluded number of charging pumps shall be verified to be inoperable by removing power to their motors (breaker racked out or transfer switch transferred).

CORE OPERATING LIMITS REPORT

MOVABLE CONTROL ASSEMBLIES - CEA POSITION

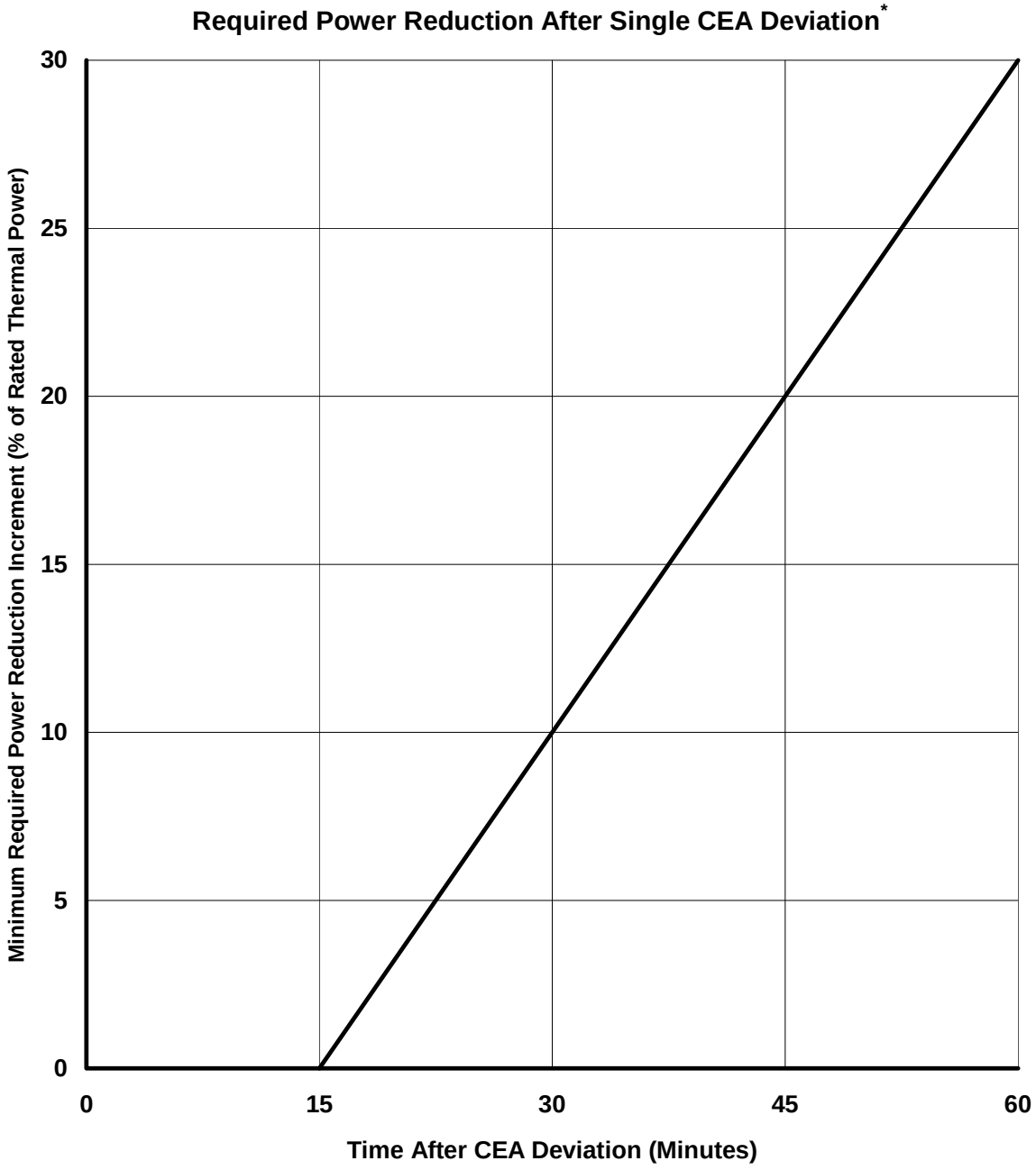
3.1.3.1.a With one CEA trippable but misaligned from any other CEA in its group by more than 19 inches, operation in MODES 1 and 2 may continue, provided that core power is reduced in accordance with COLR Figure 3.

3.1.3.1.b With one or more CEAs trippable but misaligned from any other CEAs in its group by more than 7 inches but less than or equal to 19 inches, operation in MODES 1 and 2 may continue, provided that core power is reduced in accordance with COLR Figure 3.

NOTES

1. Item 3.1.3.1.a corresponds with ACTION “c” of Technical Specification 3.1.3.1.

2. Item 3.1.3.1.b corresponds with ACTION “d” of Technical Specification 3.1.3.1.



COLR Figure 3

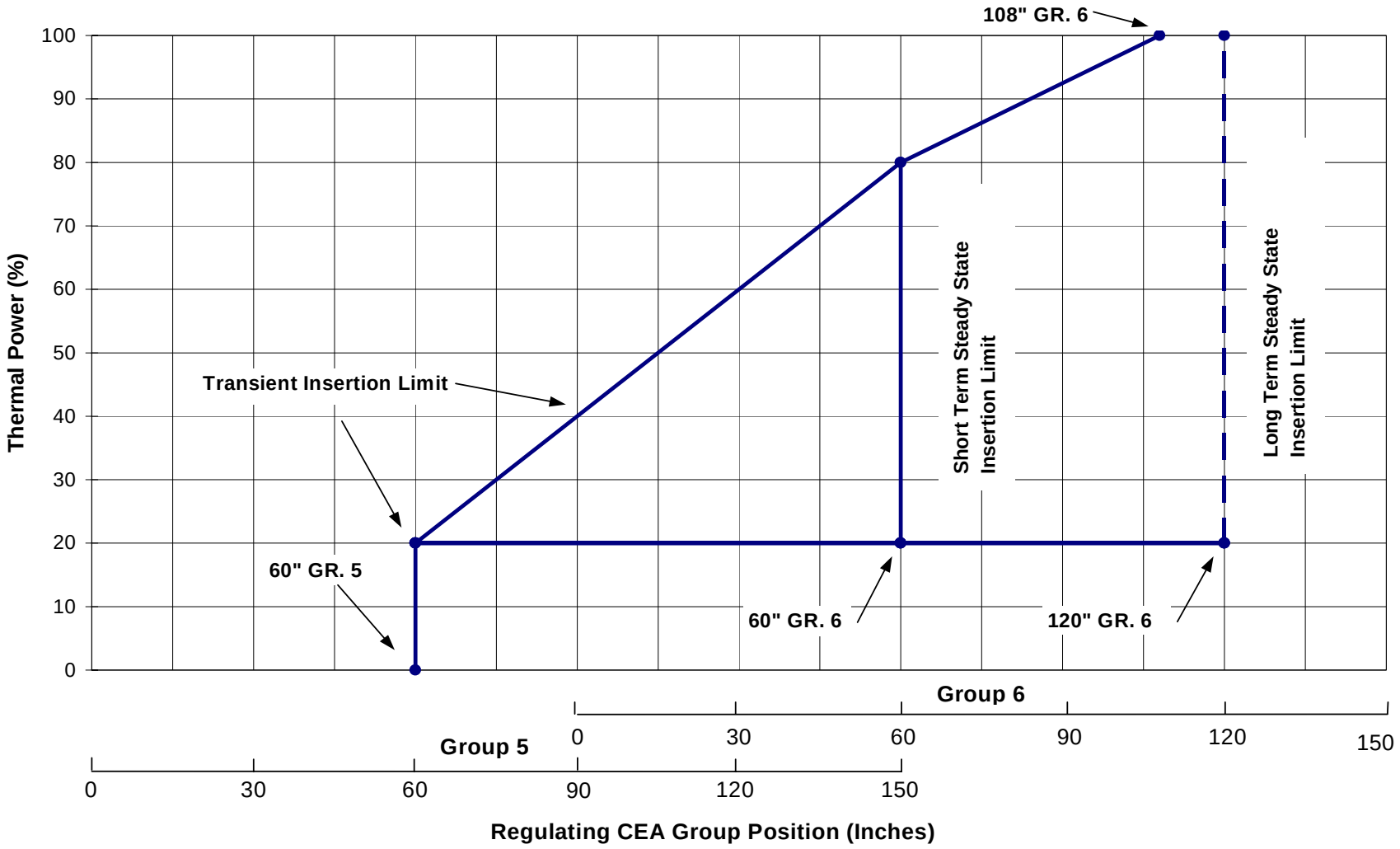
*** When thermal power is reduced to 60% of rated thermal power per this limit curve, further reduction is not required by this Technical Specification.**

CORE OPERATING LIMITS REPORT

REGULATING AND GROUP P CEA INSERTION LIMITS

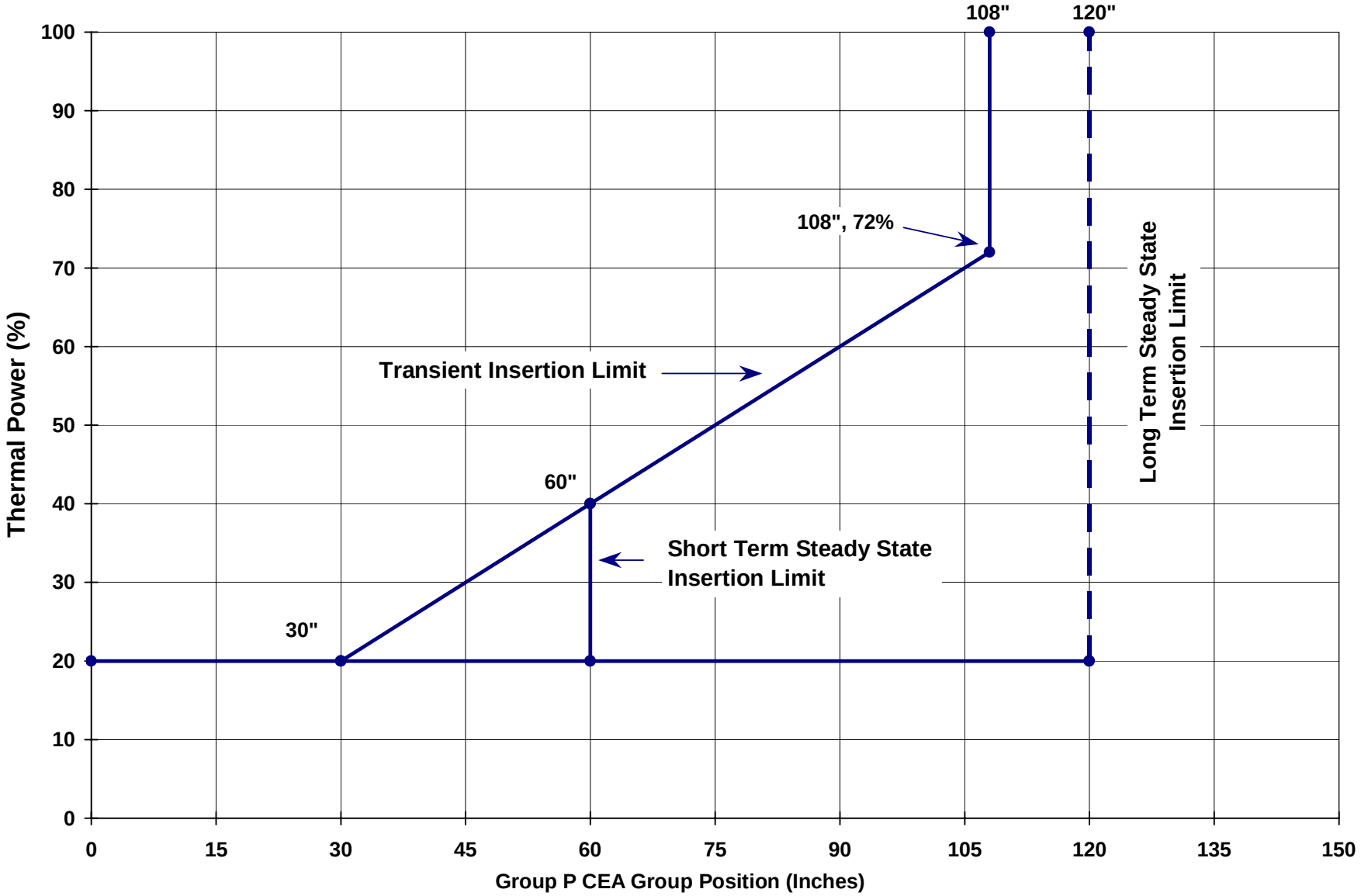
3.1.3.6 The regulating CEA groups and Group P CEAs shall be limited to the withdrawal sequence and to the insertion limits shown on COLR Figure 4 (regulating groups) and Figure 5 (Group P).

Regulating CEA Group Insertion Limits Versus Thermal Power



COLR Figure 4

Group P CEA Group Insertion Limits Versus Thermal Power



COLR Figure 5

CORE OPERATING LIMITS REPORT

LINEAR HEAT RATE

3.2.1 The linear heat rate shall be maintained:

a. ≤ 12.9 kW/ft when COLSS is in service

b. ≤ 13.2 kW/ft when COLSS is out of service

In accordance with Technical Specification 3.6.1.5 Action a, with the minimum containment average air temperature less than 95°F but greater than or equal to 90°F, the linear heat rate shall be maintained:

a. ≤ 12.7 kW/ft when COLSS is in service

b. ≤ 13.0 kW/ft when COLSS is out of service

COLR Figure 6

(Not Used)

COLR Figure 7

(Not Used)

CORE OPERATING LIMITS REPORT

AZIMUTHAL POWER TILT- T_q

3.2.3 The measured AZIMUTHAL POWER TILT shall be maintained £ 0.03.

DNBR MARGIN

3.2.4 The DNBR margin shall be maintained by one of the following methods:

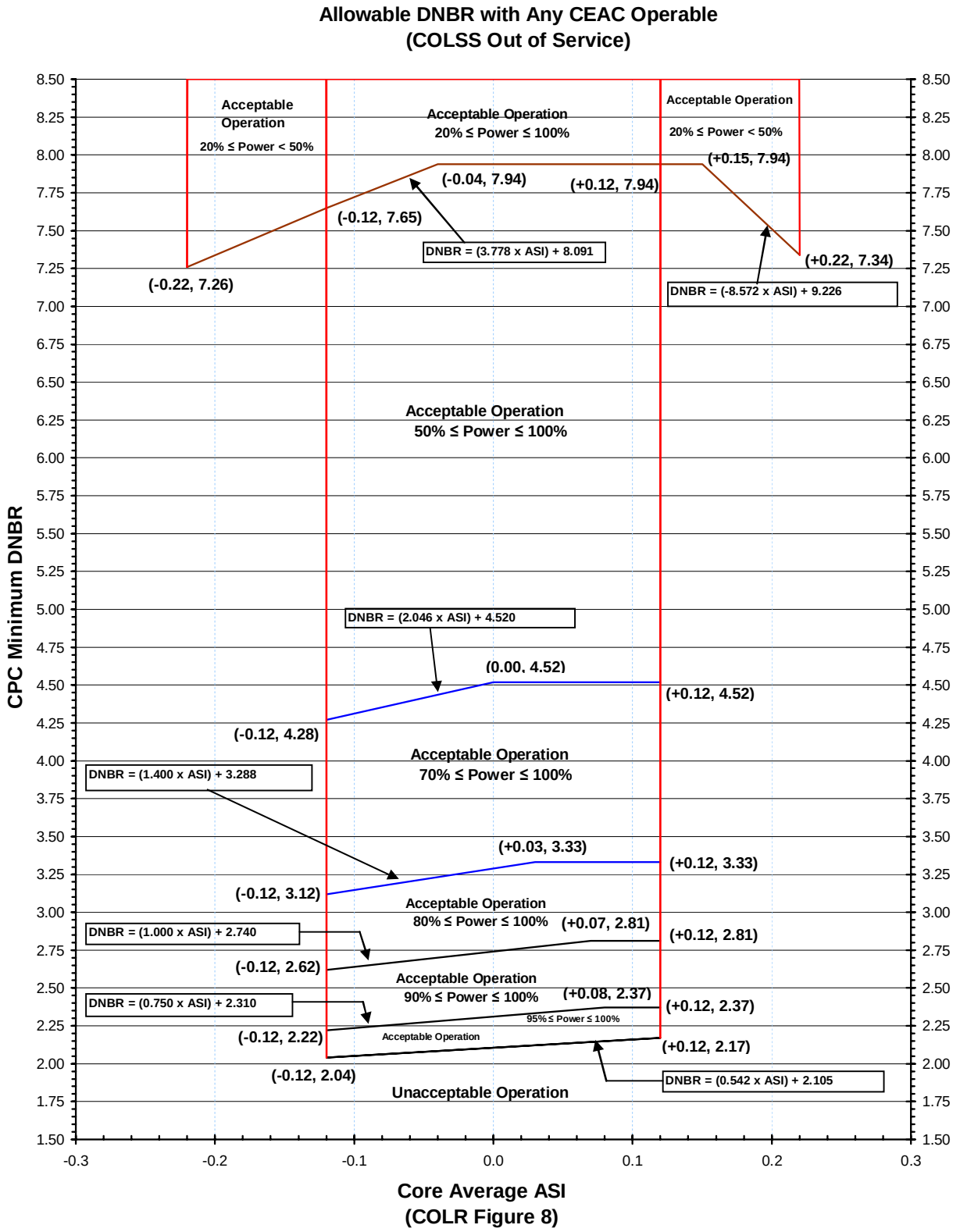
a) When COLSS is in service and neither CEAC is operable: maintain COLSS calculated core power less than or equal to COLSS calculated core power operating limit based on DNBR decreased by 13% RATED THERMAL POWER.

b) When COLSS is out of service and at least one CEAC is operable: operate within the region of acceptable operation shown on COLR Figure 8 (or 8A as appropriate), using any operable CPC channel.

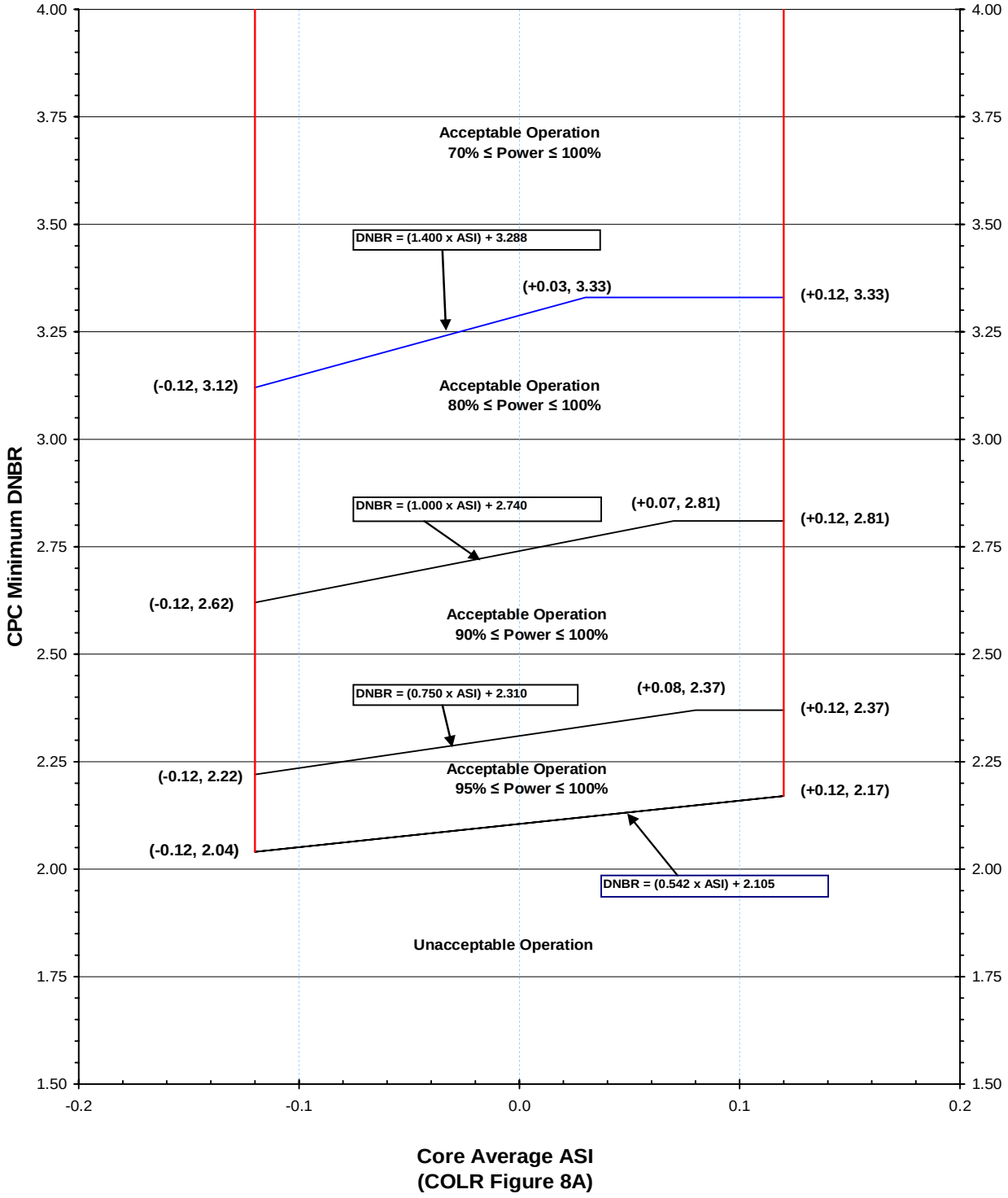
c) When COLSS is out of service and neither CEAC is operable: operate within the region of acceptable operation shown on COLR Figure 9 (or 9A as appropriate), using any operable CPC channel.

NOTES

1. The various DNBR limit lines shown between the vertical ASI limit lines at ±0.12 and ±0.22 on Figures 8, 8A, 9, and 9A represent the minimum CPC-calculated DNBR value required for operation in the power range displayed in the area above each line. Operation at lower power levels requires that a larger DNBR value be maintained. For example, with ASI equal to -0.12 and a core power of 85%, CPC calculated DNBR must be a minimum of 2.62 with any CEAC Operable. At 79% power and the same ASI value with any CEAC Operable, the calculated DNBR must be at least 3.12. At 65% power and the same ASI value, DNBR must be a minimum of 4.28. At 90% power and an ASI value of +0.08, DNBR must be no less than 2.37.
2. The vertical ASI limit lines shown at ±0.12 and ±0.22 on Figures 8, 8A, 9, and 9A may be considered as extending beyond the maximum DNBR value on the Y-axis of the charts. Therefore, when monitoring DNBR with these figures, compliance is achieved at all power levels shown on a given figure when DNBR is greater than the largest DNBR value on the vertical scale.
3. Figure 8A is provided to offer better resolution for the four power ranges in the lower portion of Figure 8. Figure 9A is provided to offer better resolution for the four power ranges in the lower portion of Figure 9.
4. Equations are provided on Figures 8, 8A, 9, and 9A to assist in determining DNBR limits in the sloped portions of the plots.


Allowable DNBR with Any CEAC Operable
(COLSS Out of Service)
CPC Minimum DNBR
Core Average ASI
(COLR Figure 8)
Acceptable Operation
20% ≤ Power < 50%
Acceptable Operation
20% ≤ Power ≤ 100%
Acceptable Operation
20% ≤ Power < 50%
(-0.22, 7.26)
(-0.12, 7.65)
(-0.04, 7.94)
(+0.12, 7.94)
(+0.15, 7.94)
(+0.22, 7.34)
DNBR = (3.778 x ASI) + 8.091
DNBR = (-8.572 x ASI) + 9.226
Acceptable Operation
50% ≤ Power ≤ 100%
DNBR = (2.046 x ASI) + 4.520
(0.00, 4.52)
(+0.12, 4.52)
(-0.12, 4.28)
Acceptable Operation
70% ≤ Power ≤ 100%
DNBR = (1.400 x ASI) + 3.288
(+0.03, 3.33)
(+0.12, 3.33)
(-0.12, 3.12)
Acceptable Operation
80% ≤ Power ≤ 100%
(+0.07, 2.81)
(+0.12, 2.81)
DNBR = (1.000 x ASI) + 2.740
(-0.12, 2.62)
Acceptable Operation
90% ≤ Power ≤ 100%
(+0.08, 2.37)
(+0.12, 2.37)
DNBR = (0.750 x ASI) + 2.310
95% ≤ Power ≤ 100%
Acceptable Operation
(-0.12, 2.22)
(+0.12, 2.17)
(-0.12, 2.04)
DNBR = (0.542 x ASI) + 2.105
Unacceptable Operation

Subset of Allowable DNBR with Any CEAC Operable
(COLSS Out of Service)

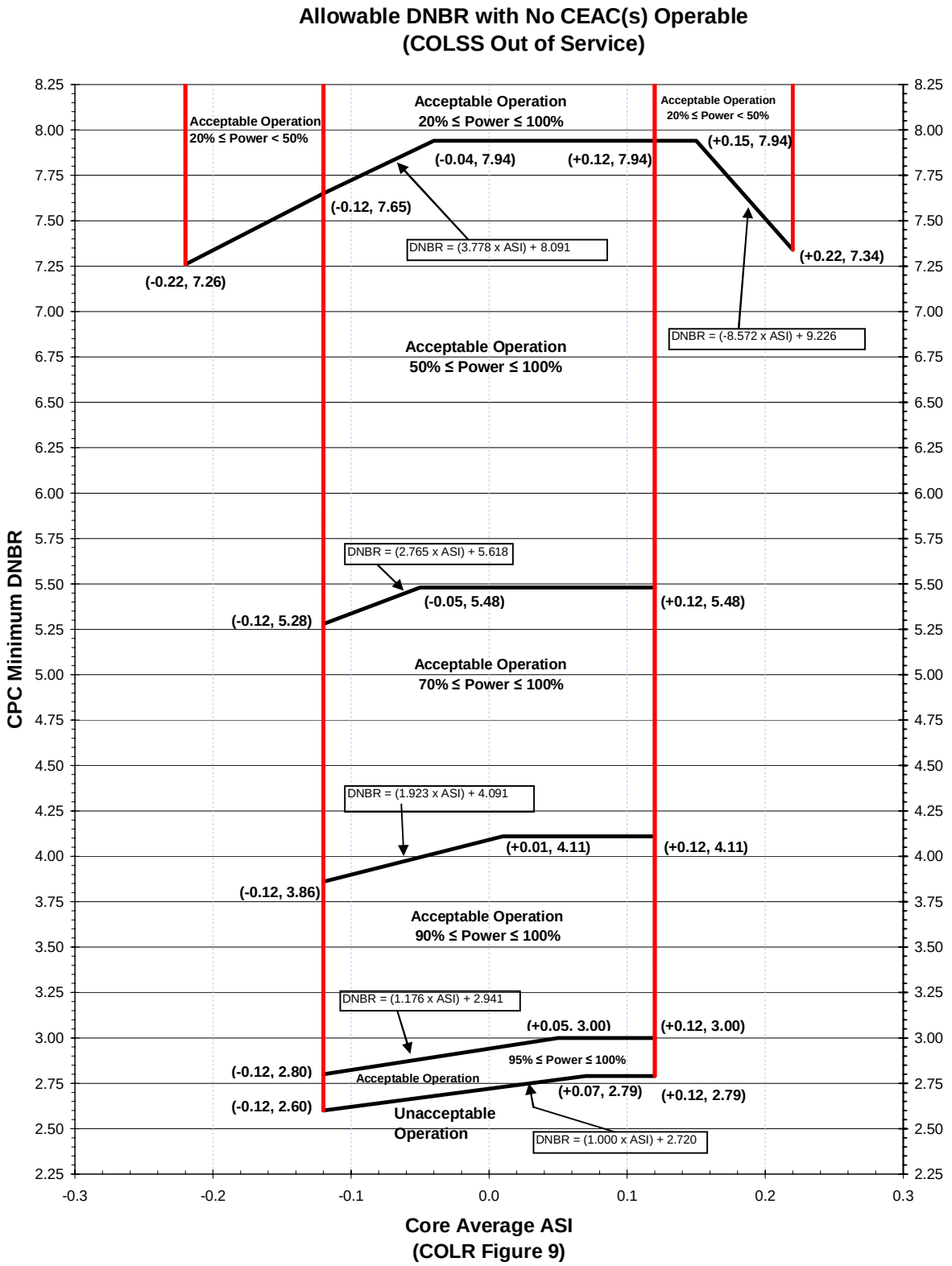


COLR Figure 8.1

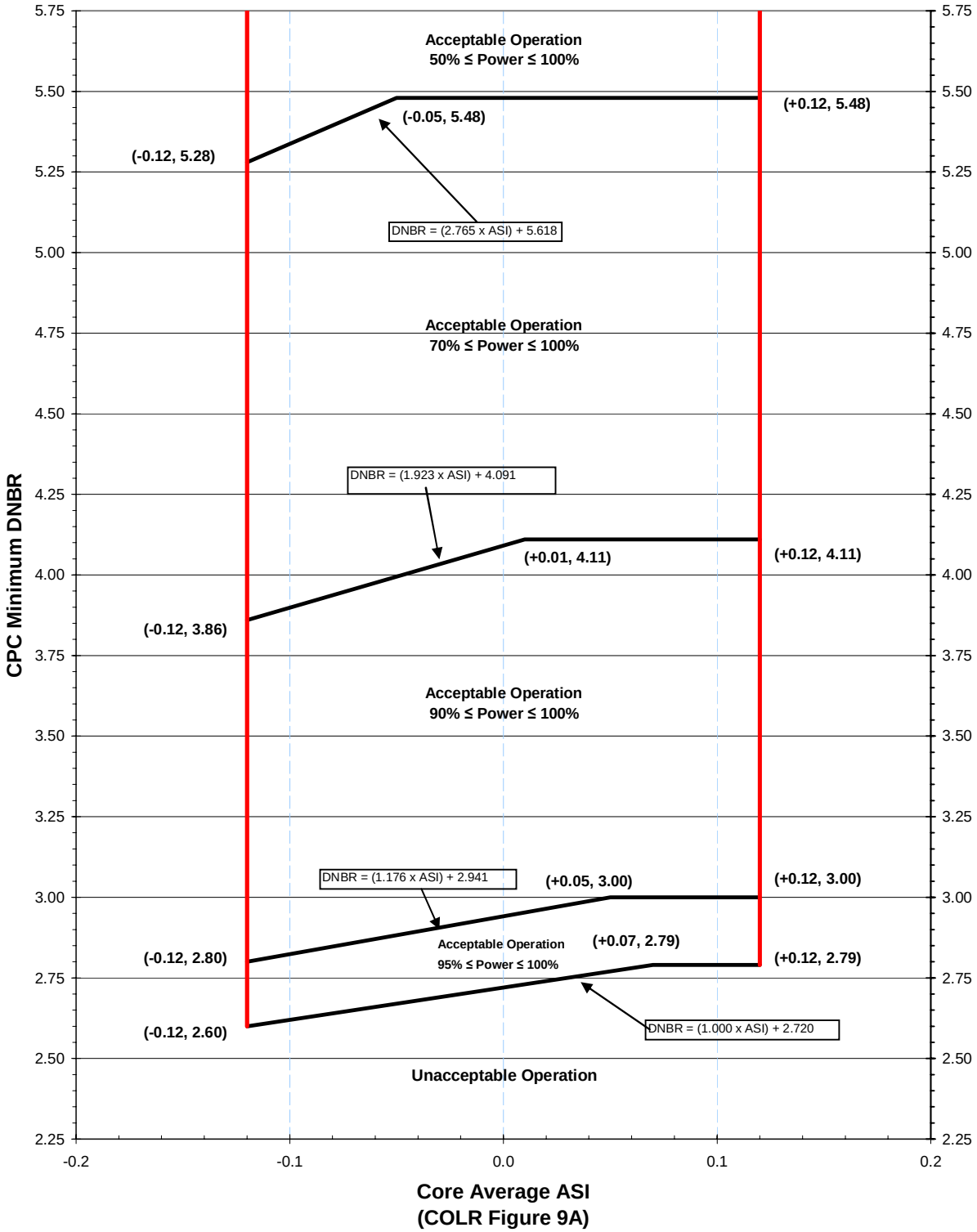
(Not Used)

COLR Figure 8.1A

(Not Used)


Allowable DNBR with No CEAC(s) Operable
(COLSS Out of Service)
CPC Minimum DNBR
Core Average ASI
(COLR Figure 9)
Acceptable Operation
20% ≤ Power < 50%
Acceptable Operation
20% ≤ Power ≤ 100%
Acceptable Operation
20% ≤ Power < 50%
(-0.22, 7.26)
(-0.12, 7.65)
(-0.04, 7.94)
(+0.12, 7.94)
(+0.15, 7.94)
(+0.22, 7.34)
DNBR = (3.778 x ASI) + 8.091
DNBR = (-8.572 x ASI) + 9.226
Acceptable Operation
50% ≤ Power ≤ 100%
DNBR = (2.765 x ASI) + 5.618
(-0.12, 5.28)
(-0.05, 5.48)
(+0.12, 5.48)
Acceptable Operation
70% ≤ Power ≤ 100%
DNBR = (1.923 x ASI) + 4.091
(+0.01, 4.11)
(+0.12, 4.11)
(-0.12, 3.86)
Acceptable Operation
90% ≤ Power ≤ 100%
DNBR = (1.176 x ASI) + 2.941
(+0.05. 3.00)
(+0.12, 3.00)
95% ≤ Power ≤ 100%
(-0.12, 2.80)
Acceptable Operation
(+0.07, 2.79)
(+0.12, 2.79)
(-0.12, 2.60)
Unacceptable
Operation
DNBR = (1.000 x ASI) + 2.720

Subset of Allowable DNBR with No CEAC(s) Operable
(COLSS Out of Service)



COLR Figure 9.1

(Not Used)

COLR Figure 9.1A

(Not Used)

CORE OPERATING LIMITS REPORT

AXIAL SHAPE INDEX

3.2.7 The AXIAL SHAPE INDEX (ASI) shall be maintained within the following limits:

COLSS Operable

−0.16 ≤ ASI ≤ +0.16	for THERMAL POWERS ≥ 50% of RATED THERMAL POWER
−0.26 ≤ ASI ≤ +0.26	for THERMAL POWERS from 20% to <50% of RATED THERMAL POWER

COLSS Out of Service

−0.12 ≤ ASI ≤ +0.12	for THERMAL POWERS ≥ 50% of RATED THERMAL POWER
−0.22 ≤ ASI ≤ +0.22	for THERMAL POWERS from 20% to <50% of RATED THERMAL POWER

CORE OPERATING LIMITS REPORT

BORON CONCENTRATION

3.9.1 While in Mode 6, the RCS boron concentration shall be maintained sufficiently to ensure that the more restrictive of the following reactivity conditions is met:

a. Either K_{eff} of 0.95 or less, or

b. A boron concentration of greater than or equal to 2050 ppm.

III. METHODOLOGIES

The analytical methods used to determine the core operating limits listed above are those previously reviewed and approved by the NRC in:

1. “Qualification of the PHOENIX-P/ANC Nuclear Design System for Pressurized Water Reactor Cores,” WCAP-11596-P-A, June 1988; “ANC: A Westinghouse Advanced Nodal Computer Code,” WCAP-10965-P-A, September 1986; and “ANC: A Westinghouse Advanced Nodal Computer Code: Enhancements to ANC Rod Power Recovery,” WCAP-10965-P-A Addendum 1, April 1989. (Methodology for Specifications 3.1.1.1 and 3.1.1.2 for Shutdown Margins, 3.1.1.3 for MTC, 3.1.3.6 for Regulating and Group P CEA Insertion Limits, 3.1.2.9 Boron Dilution (Calculation of CBC and IBW), and 3.9.1 Boron Concentration).

2. "C-E Method for Control Element Assembly Ejection Analysis," CENPD-190-A, Revision 0, January 1976. (Methodology for Specification 3.1.3.6 for Regulating and Group P CEA Insertion Limits and 3.2.3 for Azimuthal Power Tilt.)

3. "Modified Statistical Combination of Uncertainties" CEN-356(V)-P-A, Revision 1-P-A, May 1988. (Methodology for Specification 3.2.4.c and 3.2.4.d for DNBR Margin and 3.2.7 for ASI.)

4. "Calculative Methods for the CE Large Break LOCA Evaluation Model For the Analysis of C-E and W Designed NSSS,” CENPD-132, Supplement 3-P-A, June 1985. (Methodology for Specification 3.1.1.3 for MTC, 3.2.1 for Linear Heat Rate, 3.2.3 for Azimuthal Power Tilt and 3.2.7 for ASI.)

5. "Calculative Methods for the ABB CE Small Break LOCA Evaluation Model," CENPD-137-P, August 1974; Supplement 2-P-A, April 1998. (Methodology for Specification 3.1.1.3 for MTC, 3.2.1 for Linear Heat Rate, 3.2.3 for Azimuthal Power Tilt and 3.2.7 for ASI.)

6. “Technical Description Manual for the CENTS Code,” WCAP-15996-P-A, Revision 1, March 2005. (Methodology for Specification 3.1.1.1 and 3.1.1.2 for Shutdown Margins, 3.1.1.3 for MTC, 3.1.3.1 for Movable Control Assemblies – CEA Position, 3.1.3.6 for Regulating and Group P CEA Insertion Limits, and 3.2.4.b for DNBR Margin)

7. “Implementation of ZIRLO Material Cladding in CE Nuclear Power Fuel Assembly Designs,” CENPD-404-P-A, November 2001. (Methodology for Specification 3.1.1.3 for MTC, 3.2.1 for Linear Heat Rate, 3.2.3 for Azimuthal Power Tilt, and 3.2.7 for ASI).

8. “Qualification of the Two-Dimensional Transport Code PARAGON,” WCAP-16045-P-A, August 2004. (Methodology for Specifications 3.1.1.1 and 3.1.1.2 for Shutdown Margins, 3.1.1.3 for MTC, 3.1.3.6 for Regulating and Group P CEA Insertion Limits, 3.1.2.9 Boron Dilution (Calculation of CBC & IBW), 3.2.4.b for DNBR Margin and 3.9.1 Boron Concentration).

9. "Implementation of Zirconium Diboride Burnable Absorber Coatings in CE Nuclear Power Fuel Assembly Designs," WCAP-16072-P-A, Revision 0, August 2004 (Methodology for Specification 3.1.1.3 for MTC, 3.2.1 for Linear Heat Rate, 3.2.3 for Azimuthal Power Tilt, and 3.2.7 for ASI).

10. “CE 16 x 16 Next Generation Fuel Core Reference Report,” WCAP-16500-P and Final Safety Evaluation for Westinghouse Electric Company (Westinghouse) Topical Report (TR) WCAP-16500-P, Revision 0, “CE [Combustion Engineering] 16x16 Next Generation Fuel [(NGF)] Core Reference Report,” (Methodology for Specification 3.1.1.3 for MTC, 3.2.1 for Linear Heat Rate, 3.2.3 for Azimuthal Power Tilt, 3.2.4.b, 3.2.4.c, and 3.2.4.d for DNBR Margin, and 3.2.7 for ASI).

11. “Optimized ZIRLO™,” WCAP-12610-P-A and CENPD-404-P-A Addendum 1-A, July 2006. (Methodology for Specification 3.1.1.3 for MTC, 3.2.1 for Linear Heat Rate, 3.2.3 for Azimuthal Power Tilt, and 3.2.7 for ASI.)

12. “Westinghouse Correlations WSSV and WSSV-T for Predicting Critical Heat Flux in Rod Bundles with Side-Supported Mixing Vanes,” WCAP-16523-P-A Revision 0, August 2007; and Final Safety Evaluation for Westinghouse Electric Company (Westinghouse) Topical Report (TR), WCAP-16523-P, “Westinghouse Correlations WSSV and WSSV-T for Predicting Critical Heat Flux in Rod Bundles with Side-Supported Mixing Vanes,” (Methodology for Specification 3.2.4.b, 3.2.4.c, and 3.2.4.d for DNBR Margin.)

13. “ABB Critical Heat Flux Correlations for PWR Fuel,” CENPD-387-P-A Revision 0, May 2000. (Methodology for Specification 3.2.4.b, 3.2.4.c, and 3.2.4.d for DNBR Margin and 3.2.7 for ASI.)

14. “Calculative Methods for the CE Nuclear Power Large Break LOCA Evaluation Model -Improvement to 1999 Large Break LOCA EM Steam Cooling Model for Less Than 1 in/sec Core Reflood” CENPD-132, Supplement 4-P-A, Addendum 1-P and Final Safety Evaluation for Westinghouse Electric Company (Westinghouse) Topical Report (TR) CENPD-132 Supplement 4-P-A, Addendum 1-P, “Calculative Methods for the CE [Combustion Engineering] Nuclear Power Large Break LOCA Evaluation Model - Improvement to 1999 Large Break LOCA EM Steam Cooling Model for Less Than 1 in/sec Core Reflood,” (Methodology for Specification 3.1.1.3 for MTC, 3.2.1 for Linear Heat Rate, 3.2.3 for Azimuthal Power Tilt, and 3.2.7 for ASI).

15. “Application of CE Setpoint Methodology for CE 16x16 Next Generation Fuel (NGF),” WCAP 16500 P-A, Supplement 1, Revision 1, December 2010. (Methodology for Specification 3.2.4.b, 3.2.4.c, and 3.2.4.d for DNBR Margin.)