

DCS

FEB 25 1991

Docket No. 50-245

Mr. John F. Opeka  
Executive Vice President - Nuclear  
Northeast Nuclear Energy Company  
P. O. Box 270  
Hartford, Connecticut 06141-0270

Dear Mr. Opeka:

SUBJECT: INSPECTION REPORT NO. 50-245/91-81

This refers to your February 10, 1992, correspondence, in response to our December 30, 1991, letter.

In your response, you disagreed with violation 91-81-10, regarding emergency diesel generator (EDG) testing not in compliance with Technical Specifications (TS) requirements. We reviewed the "Bases" of TS Paragraph 4.9 and determined that the specific power factor was not identified in the TS. We agree that you have not violated the TS requirements. However, as mentioned in Inspection Report 50-245/91-81, Paragraph 4.2.3.1, our main concern was that you did not test the EDG with sufficient kVA to demonstrate its capability to handle the accident load. Discussions between Mr. J. Regan of your engineering staff and Mr. L. Cheung of this office in March 1993 indicated that you agree to revise the EDG test procedure to include an appropriate power factor corresponding to the accident load. We hereby withdraw violation 91-81-10.

The corrective and preventive action documented in your letter for other findings will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:

James T. Wiggins, Acting Director  
Division of Reactor Safety

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FEB 25 1994

Northeast Nuclear Energy  
Company

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cc:

W. D. Romberg, Vice President - Nuclear, Operations Services  
S. E. Scace, Vice President, Millstone Station  
J. P. Stetz, Vice President, Haddam Neck Plant  
H. F. Haynes, Nuclear Unit Director  
R. M. Kacich, Director, Nuclear Licensing  
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RI:DRS  
Cheung

04/7/93

RI:DRS  
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RI:DRS  
Wiggins

02/25/94

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# NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY  
WESTERN MASSACHUSETTS ELECTRIC COMPANY  
HOLYOKE WATER POWER COMPANY  
NORTHEAST UTILITIES SERVICE COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

General Offices • Selden Street, Berlin, Connecticut

P.O. BOX 270  
HARTFORD, CONNECTICUT 06141-0270  
(203) 665-5000

February 10, 1992

Docket No. 50-245

B14040

Re: Inspection Report  
No. 50-245/91-81  
10CFR2.201

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Gentlemen:

Millstone Nuclear Power Station, Unit No. 1  
Reply to Notice of Violation  
Inspection Report No. 50-245/91-81

In a letter dated December 30, 1991, <sup>(1)</sup> the NRC Staff transmitted to Northeast Nuclear Energy Company (NNECO) the results of the Electrical Distribution System Functional Inspection (EDSFI) conducted between August 26 and September 20, 1991, at Millstone Unit No. 1. In this report the NRC identified five Severity Level IV violations.

Pursuant to 10CFR2.201, and in accordance with the instructions contained in the inspection report, NNECO provides as Attachment 1 to this letter a reply to the Notice of Violation. NNECO does not believe that a violation occurred concerning the monthly testing of the emergency diesel generator at continuous rated load output. An explanation and the basis for disputing this violation is provided in Attachment 1.

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(1) M. W. Hodges letter to J. F. Opeka, "Electrical Distribution System Functional Inspection (EDSFI) of Millstone, Unit 1 Inspection Report No. 50-245/91-81," dated December 30, 1991.

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U.S. Nuclear Regulatory Commission  
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February 10, 1992

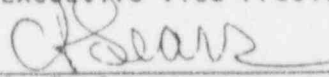
We trust that you will find this information satisfactory, and we remain available to answer any questions you may have.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: J. F. Opeka  
Executive Vice President

BY:

  
\_\_\_\_\_  
C. F. Sears  
Vice President

cc: T. T. Martin, Region I Administrator  
D. H. Jaffe, NRC Project Manager, Millstone Unit No. 1  
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3

Docket No. 50-245  
B14040

Attachment 1

Millstone Nuclear Power Station, Unit No. 1

Reply to a Notice of Violation

Inspection Report No. 50-245/91-81

February 1992

A. Violation No. 1

Description

"The Millstone Unit 1 Technical Specification, Paragraph 4.9.A, states, in part, that the diesel generator shall be started and run at its continuous rated load output for at least 60 minutes once a month.

"The Millstone Unit 1 Updated Final Safety Analysis Report, Section 8.3.1.1.5.1 defines the 'continuous rated load output' for the diesel generator to be 3330 kVA at 0.8 power factor.

"Contrary to the above, on August 13, 1991, it was identified that the diesel generator was being tested once a month at a load between 2665 kW and 2700 kW at essentially a power factor of unity (1.0); thus, it was effectively loaded to approximately 2665 kVA to 2700 kVA. This test did not meet the T.S. requirement of 'continuous rated load output' of 3330 kVA.

"This is a Severity Level IV Violation (Supplement I)."

Reason for Denial

NNECO has considered, in detail, the Notice of Violation issued on December 30, 1991, and maintains that Technical Specification 4.9.A has not been violated since adequate testing was performed on the diesel generator. The apparent violation stems from the NRC Staff taking the requirements for the test from Technical Specification 4.9.A, not fully considering the Technical Specification Bases for this requirement, and instead electing to use the Updated Final Safety Analysis Report (UFSAR) to establish the rating for the test. While it may be the Staff's opinion that the rating stated in Section 4.9.A (i.e. "continuous rated load output") of the Technical Specifications was meant to be the design rating of the diesel generator, NNECO does not agree with the Staff based upon a rating other than the design rating being defined in the Technical Specification Bases for the test. The Bases very specifically states that "for the diesel generator, testing is performed at the continuous rated load of 2665 kW, which is greater than the postaccident load requirements."

Additional Information

In NNECO's submittal of additional information to the Staff dated October 7, 1991,<sup>(2)</sup> we provided extensive information regarding all of the testing performed on the diesel generator at various times, and explained how it demonstrated the capability of the diesel generator to supply both real and reactive power beyond that amount required by the accident loads. NNECO also explained that the rating used for the diesel generator testing identified in Section 4.9.A of the Millstone Unit No. 1 Technical Specifications is clearly defined in the Bases of the Technical Specifications for that section.

It should also be noted, that by letter dated April 5, 1991,<sup>(3)</sup> the NRC Staff issued Amendment No. 50 to Facility Operating License No. DPR-21 for Millstone Nuclear Power Station, Unit 1. This amendment clarified the surveillance requirements for the diesel generator and the gas turbine generator, defining the surveillance loading requirements and run times. It was in this amendment that the continuous rated load for the diesel generator surveillance test was established and defined in the Bases of the Millstone Unit No. 1 Technical Specifications. Upon review of this amendment by the Staff the determination was made that all applicable requirements for performing the monthly surveillance test on the diesel generator were satisfied. This is evidenced by the statements contained in Section 2.0 of the Safety Evaluation attached to the April 5, 1991 letter from the NRC.

NNECO recognizes the value of periodically testing Emergency Diesel Generators (EDG) while carrying a certain amount of reactive load. NUSCO is conducting a study to evaluate the EDG testing practices, Technical Specification requirements, and Design Basis requirements for all of NU's Nuclear Generation Facilities. This study will form the basis for recommendations to change EDG Surveillance Procedures, Technical Specifications, and/or UFSARs. The NRC's resolution of Generic Issue B-56 will be factored into the recommendations.

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- (2) E. J. Mroczka letter to J. P. Durr, "Millstone Nuclear Power Station, Unit No. 1, Electrical Distribution System Functional Inspection Additional Information," dated October 7, 1991.
- (3) M. L. Boyle letter to E. J. Mroczka, "Issuance of Amendment (TAC No. 79258)," dated April 5, 1991.

B. Violation No. 2

Description

"The Millstone Unit 1 Technical Specification, Paragraph 3.9.c, 'Diesel and Gas Turbine' requires that a minimum of 23,500 (sic) gallons of fuel be available at the site for the diesel generator.

"Contrary to the above, on August 13 (sic), 1991, it was identified that the fuel available in the tank (sic), due to pump and piping arrangements, was approximately 21,175 gallons.

"This is a Severity Level IV Violation (Supplement I)."

Reason for Violation

The minimum volume of 23,400 gallons<sup>(4)</sup> specified in the current Millstone Unit No. 1 Technical Specifications is the summation of 22,000 gallons in the fuel oil storage tank and 1400 gallons in the diesel generator day tank. When this volume was determined, the unusable volume in the fuel oil storage tank between the pump suction and the bottom of the tank and the unusable volume in the day tank were not taken into consideration.

Corrective Steps Taken and Results Achieved

Millstone Unit No. 1 Operations Department was notified on August 30, 1991, that there was a potential noncompliance with Technical Specification 3.9.C based on the results of NUSCO calculation 90-105-797ES. They immediately obtained level readings for the fuel oil storage tank and the day tank. The combined unusable volume in the two tanks was subtracted from the total and the result was a usable volume of fuel oil on-site greater than 23,400 gallons. The total unusable volume of the fuel oil storage tank and the day tank is 1724 gallons. Based on the small difference in the usable volume of fuel (i.e., approximately 4.5 days of fuel oil vs. 5 days), NNECO believes the safety significance of this issue is minimal.

A temporary procedure change was made to station procedure SP668.8, Rev. 6, "Gas Turbine and Diesel Fuel Inventory." The temporary change

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(4) NNECO would like to point out that the minimum volume (23,500 gal) stated in the above violation is incorrect. The correct number is 23,400 gallons and this is noted in Section 3.2.2.1 of the Inspection Report. In addition, NUSCO calculation 90-105-797ES, which identified the total usable volume for both the fuel oil storage tank and day tank as 21,175 gallons, was not completed until August 30, 1991.



was effective on October 18, 1991, and changed Step 2.1 to ensure that the summation of the fuel oil storage tank level and the diesel generator day tank level is 25,400 gallons. Also, a revision was made to station procedure OP338, "Standby Diesel Generator," Step 3.1.2, making the same change as noted above in the temporary change to SP668.8, Rev. 6. This revision was effective October 30, 1991. The volume of unusable fuel in the storage tank and the day tank was determined to be 1679 and 45 gallons respectively. Therefore, by maintaining the combined level in the storage and day tanks at 25,400 gallons, the minimum usable fuel oil on site will always be greater than 23,400 gallons. It should also be noted that to alleviate any instrument inaccuracies, the level in the fuel oil storage tank is currently being obtained by sounding the tank with a dipstick.

#### Corrective Steps Taken to Avoid Further Violations

NUSCO calculation 90-105-797ES was completed during the inspection and indicated that the unusable volume in the fuel oil storage tank and the diesel generator day tank was not taken into consideration when the minimum volume of 23,400 gallons was determined.

Also, all additional tanks governed by the Millstone Unit No. 1 Technical Specifications are being or have been reviewed to ensure the usable volume is correct and meets the design requirements. This activity will be completed by February 28, 1992.

#### Date When Full Compliance Will be Achieved

Technical Specification compliance was reestablished on August 30, 1991.

#### Generic Implications

This issue was already addressed during the Haddam Neck Plant EDSFI and was found to be in compliance with the Haddam Neck Plant Technical Specification requirements. This violation and the above mentioned corrective actions will be reviewed for applicability to Millstone Unit Nos. 2 and 3, and appropriate actions will be taken, if required.

### C. Violation No. 3

#### Description

"10CFR50, Appendix B, Criterion III, states, in part that measures must be established for the selection and review for suitability of application of materials, parts, equipment, and processes that are essential to the safety-related functions of the structures, systems and components. It also requires that design control measures be provided for verifying and checking the adequacy of design.

"Contrary to the above, on August 20, 1991, modifications to the power feeds for valve 1-IC-04, which enters containment through a penetration, were not properly reviewed and verified for suitability and adequacy of design. The modification was made without adequate analysis, design review, and determination of suitability of function to assure containment integrity, a safety-related function, in that the size of the cable conductor was not designed or selected to assure the current limiting function of the cable to protect the integrity of the penetration.

"This is a Severity Level IV Violation (Supplement 1)."

Reason for Violation

Engineering and design personnel involved in Plant Design Change Request No. 1-94-80, for modifying the power feeds for valve 1-IC-04, were not aware of the original plant design basis utilized by General Electric and/or Ebasco for the containment electrical penetrations. This work was performed in the early 1980s. (5)

Corrective Steps Taken and Results Achieved

A spare penetration conductor will be paralleled with the existing penetration conductor, thereby providing a conductor cross sectional area within the penetration assembly twice that of the cable from the electric power source to the penetration assembly. This change will bring the circuit for valve 1-IC-04 into accordance with the resolutions reached under Systematic Evaluation Program Topic VIII-4, Electrical Penetrations of Reactor Containment.

Essentially no safety significance is attributed to not immediately modifying the penetration circuit. This is due to: 1) the circuit is not normally energized, 2) the period of time that the circuit would be energized is limited to the motor operated valve stroking time ( $\leq 19$  seconds), 3) the cable fusing mechanism is only credited should the circuit protective device for this circuit fail, and 4) the field cable external to the penetration assembly is most likely to fuse open at a stress point such as a crimp joint or terminal lug, versus within either the penetration or field cable conductors themselves.

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(5) NNECO is assuming that the NRC intended the August 20, 1991 date included in the violation to refer to the date of discovery of this issue and not the date at which the modifications were being implemented.

#### Corrective Steps to Avoid Further Violations

First, the plant design change process, as controlled by Nuclear Engineering and Operations (NE&O) procedure NEO 3.03, "Plant Design Change Records (PDCRs)," has been substantially improved since the implementation of PDCR No. 1-94-80. As a specific example of the improved process, there is now a section of the PDCR form entitled "Bases of Current Design" which requires the basis of the current design be understood before any changes are undertaken.

Secondly, NUREG-0824, "Integrated Plant Safety Assessment, Systematic Evaluation Program (SEP), Millstone Nuclear Power Station, Unit 1," was issued subsequent to the implementation of PDCR 1-94-80. This document, in part, describes the safety objectives for electrical penetrations of reactor containment, and references closure documentation for this SEP topic. There is now a more complete understanding of the applicable design basis.

Finally, NNECO has undertaken a Design Basis Reconstruction Program which will provide an electrical systems module, which will include a section on containment electrical penetrations and their applicable requirements.

#### Date When Full Compliance Will Be Achieved

A spare penetration conductor will be paralleled with the existing penetration conductor at the next outage of significant duration or during the next refueling outage, whichever occurs first.

#### Generic Implications

The corrective actions, as described above, will be reviewed for applicability to Millstone Unit Nos. 2 and 3 and the Haddam Neck Plant, and appropriate actions will be taken, if required.

#### D. Violation No. 4

##### Description

"10CFR50, Appendix B, Criterion V, states, in part, that activities affecting quality be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances, and the activities be accomplished in accordance with these instructions, procedures, or drawings.

"Contrary to the above, on August 13, 1991, the following activities at Millstone Unit 1 were not accomplished in accordance with a documented instruction, procedure, or drawing; or a documented instruction, procedure, or drawing did not exist for some safety-related activities.

- "a. The Station Procedure ACP-QA-3.02D required a biennial review of maintenance and surveillance procedures for appropriateness and adequacy.

Contrary to the above, on August 13, 1991, a substantial number of these procedures, the required biennial review had not been performed. In some cases, procedures had not been reviewed since 1987.

- "b. Contrary to the above, on August 13, 1991, there was no documented procedure to control and operate the safety related heating, ventilation, and air conditioning system in the switchgear area of Millstone Unit 1. The operation of this system had not been controlled for an extended period of time.

"Collectively, the above examples constitute a Severity Level IV Violation (Supplement 1)."

Reason for Violation

- a. Numerous maintenance and surveillance procedures did not meet Administrative Control Procedure ACP-QA-3.04D, "Biennial Review of Station Procedures," requirements. The procedure requires that through biennial review a thorough assessment of all technical, regulatory, and administrative attributes is achieved. This violation occurred due to lack of adequate tracking of this activity.
- b. This violation occurred due to a failure to recognize the need to proceduralize the method of ventilating the switchgear during the period the steam coils were isolated from the intake fans. The steam heating lines to the inlet air handling unit were removed due to concerns over high energy steam line breaks.

Corrective Steps Taken and Results Achieved

- a. All maintenance and I&C procedures which have not been assessed for technical, regulatory, and administrative accuracy will be thoroughly reviewed prior to beginning any work requiring the guidance provided within.

Detailed review of maintenance and I&C procedures has become a common practice since Millstone accelerated schedules for our Procedure Rewrite Program, and expanded our efforts in the procedure compliance arena. The Procedure Rewrite Program intends to upgrade the quality of all Millstone procedures by December 31, 1992.

- b. Operating procedure OP327, "Heating, Ventilation, and Air Conditioning," was revised on February 7, 1992, to ensure adequate

control and monitoring of the switchgear area ventilation while the system modifications are being completed.

Corrective Steps to Avoid Further Violations

- a. NNECO will periodically review the status of procedures within the cognizance of the Maintenance and I&C Departments to ensure compliance with the biennial review requirement. Resources will be managed as necessary to ensure continued compliance.
- b. Design changes to the switchgear area ventilation system are ongoing. The design changes consist of installing electric heating coils in the inlet ducting and adding recirculation ducting, dampers, and controls to enhance summer and winter operation of the system. OP327 will be revised further upon completion of the modifications.

Increased awareness by plant management regarding the need for operations and engineering personnel to proceduralize compensatory measures when equipment is taken out of service for an extended period of time will help to prevent similar recurrences of this issue.

Date When Full Compliance Will be Achieved

- a. Maintenance Department - Full compliance with the ACP-QA-3.02D biennial review requirement will be achieved by December 31, 1992.

I&C Department - Full compliance with the ACP-QA-3.02D biennial review requirement will be achieved by April 30, 1992.

The difference in the dates of full compliance is due to the fact that the Millstone Unit No. 1 I&C Department has a smaller number of procedures.

- b. Full compliance was achieved on February 7, 1992.

Generic Implications

The corrective actions, as described above, will be reviewed for applicability to Millstone Unit Nos. 2 and 3 and the Haddam Neck Plant, and appropriate actions will be taken, if required.

E. Violation No. 5

Description

"10CFR50, Appendix B, Criterion IV, states, in part, that measures must be established to assure that applicable regulatory requirements, design

bases, and other requirements which are necessary to assure adequate quality are suitably included or referenced in the documents for procurement of material, equipment, and services.

"Contrary to the above, on August 13, 1991, the procurement documents for the replacement of the safety-related cooling coils in the emergency diesel generator room cooling system did not include quality assurance and service qualification requirements for these coils; thus the coils were procured without any assurance of quality and seismic qualification, and were installed in the system.

"This is a Severity Level IV Violation (Supplement 1)."

#### Reason for Violation

The cooling coils for air handling units HVH-1 and 2 were replaced in 1986 with Non-QA coils and with a Non-QA work order. These activities were consistent with the classification of the coils contained in the Material, Equipment, and Parts List (MEPL) at that time. The MEPL evaluation that was initially performed resulted in an incorrect QA classification for HVH-1 and 2. However, during a high energy line break (HELB) evaluation of the heating steam lines in 1990, a NUSCO engineer questioned the classification of HVH-1 and 2 and subsequently initiated a MEPL evaluation. This MEPL evaluation determined that HVH-1 and 2 should be classified as QA Category 1, which is consistent with the original system design. In accordance with NEO 6.01, "Material, Equipment, and Parts Lists for In-Service Nuclear Generation Facilities," a nonconformance report (NCR) should have been initiated per NEO 3.05, "Nonconformance Reports." An NCR was not initiated, therefore, no followup actions evaluating past Non-QA work or modifications or HVH-1 and 2 were performed.

#### Corrective Steps Taken and Results Achieved

On September 13, 1991, an operability evaluation of HVH-1 and 2 was performed. The units were analyzed as an assembly including: fan, motor, filters, cooling coils, vibration isolators, and base frame anchorage using the SQUG methodology outlined in "Generic Implementation Procedure for Seismic Verification of Nuclear Plant Equipment." This evaluation, including a walkdown of the system, concluded that HVH-1 and 2 will remain operable during and after a seismic event.

The Millstone Unit No. 1 NRC Resident Inspector witnessed the walkdown of HVH-1 and 2, discussed the calculations and conclusions with licensee

engineering staff, and had no further questions concerning operability of HVH-1 and 2. (6)

#### Corrective Steps Taken to Avoid Further Violations

In order to assure that Non-QA work or modifications has not been performed on incorrectly classified heating and ventilation systems/equipment, the following verification process will be performed:

- a. Identify all heating and ventilation equipment in the Production Maintenance Management System (PMMS) and verify the QA classification.
- b. For all heating and ventilation equipment that is, or will be evaluated as, QA Category 1, verify that no Non-QA work or modifications has been performed on this equipment.

In addition, the establishment of the onsite procurement group will ensure uniform interpretation of equipment QA requirements when replacement or new equipment/parts are ordered.

Moreover, all additional air handling units that support the operation of safety-related equipment were analyzed and walked down. All discrepancies were promptly corrected. The Millstone Unit No. 1 NRC Resident Inspector reviewed the NNECO nonconformance reports, design change notices, plant design change reports, and automated work orders associated with the repairs to these units and he also inspected the work in the field. The NRC inspector, as stated in the November 26, 1991 letter, concluded that the repairs adequately restored the seismic capabilities of the heating units.

In addition, a section of the week long Procurement Requirements Course, which began implementation in 1991, is devoted to providing instruction for the use of NEO 6.01. This course is required for all Technical Staff and Managers as part of their initial training. This increased awareness of the MEPL procedure and MEPL evaluation process should alleviate future findings in this area.

#### Date of Full Compliance

NNECO has been in full compliance since September 13, 1991. Actions to prevent recurrence described above; with the exception of training, which is conducted continuously, will be completed by December 31, 1992.

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(6) E. C. Wenzinger letter to J. F. Opeka, "Millstone Unit 1 Inspection 91-24," dated November 26, 1991.

U.S. Nuclear Regulatory Commission  
814040/Attachment 1/Page 11  
February 10, 1992

Generic Implications

The corrective actions, as described above, will be reviewed for applicability to Millstone Unit Nos. 2 and 3 and the Haddam Neck Plant, and appropriate actions will be taken, if required.



## 4.9 AUXILIARY ELECTRICAL SYSTEM

### BASES

- A. The monthly test of the diesel generator and gas turbine generator is conducted to check for equipment failures and deterioration. The post accident load requirement for the gas turbine is 10,610 kW. For the diesel generator, testing is performed at the continuous rated load of 2665 kW, which is greater than the post accident load requirements. Testing for at least 60 minutes at the post accident load requirement demonstrates proper long-term operation. The units will be manually started, synchronized to the bus, and load picked up. Generator experience at other generating stations indicates that the testing frequency is adequate to assure a high reliability of operation should the system be required. In addition, during the test when the generator is synchronized to the bus it is also synchronized to the off-site power source and thus not completely independent of this source. To maintain the maximum amount of independence, a thirty day testing interval is also desirable.

Both the diesel generator and the gas turbine-generator have air compressors and air receiver tanks for starting. It is expected that the air compressors will run only infrequently. During the monthly check of the units, the receivers will be drawn down below the point at which the compressor automatically starts to check operation and the ability of the compressors to recharge the receivers. Pressure indicators are provided on each of the receivers.

Following the tests or peaking operation, of the unit and at least weekly, the fuel volume remaining will be checked. At the end of the monthly load test of the diesel generator, the fuel oil transfer pump will be operated to refill the day tank and to check the operation of this pump. Peaking operation shall be controlled so that major maintenance operations on the gas turbine will not be scheduled during an operating cycle.

The test of the diesel and gas turbine generators during the refueling outage will be more comprehensive in that it will functionally test the system; i.e., it will check starting and closure of breakers and sequencing of loads. The units will be started by simulation of a loss of coolant accident. In addition, a loss of normal power condition will be imposed to stimulate a loss of off-site power. The timing sequence will be checked to assure proper loading in the time required. Periodic tests between refueling outages check the capability of the units to run at full load. Periodic testing of the various components plus a functional test at a refueling interval are sufficient to maintain adequate reliability.

- B. Although the station batteries will gradually deteriorate with time, the surveillance specified is that which will provide an indication of all degradation long before the battery would have insufficient capacity to meet the design load which could be placed upon it. Battery cell replacements will be made in accordance with Section 6 of IEEE Standard 450-1972, "Battery Replacement Criteria."
- C. Logging the diesel and gas turbine generator fuel supply weekly and after each operation, assures that the minimum fuel supply requirements will be maintained.