Unofficial Comment Form
Project 2017-05 NUC-001-3 Periodic Review

Do not use this form for submitting comments. Use the electronic form to submit comments on the NUC-001-3 standard template. The electronic form must be submitted by 8 p.m. Eastern, Monday, January 29, 2018.

Additional information is available on the project page. If you have questions, contact Standards Developer, Mat Bunch (via email) or at (404) 446-9785.

Background
The periodic review team (PRT) completed a comprehensive review of Reliability Standard NUC-001-3 – Nuclear Plant Interface Coordination. The PRT found the standard is sufficient to protect reliability, meets the reliability objective, and no immediate revisions are necessary. The PRT, however, identified certain non-substantive or minor improvements to the quality and content of the standard that should be considered in the future. The PRT seeks comments on the observations in the Periodic Review Template summarized below. Comments received from industry will be used to make a final recommendation of whether or not revisions are required to support reliability with a PRT-initiated Standard Authorization Request.

Summary
The PRT has identified the following potential observations for future consideration:

- Requirement R1 could be enhanced to add clarification that the Nuclear Plant Generator Operator is required to provide proposed new or revised Nuclear Plant Interface Requirements (NPIRs). This is to provide clarity that future draft revisions shall be provided not only the initial draft NPIRs.

- Requirement R3 may benefit from additional clarification as to the type of "planning analyses" into which the applicable Transmission Entities must incorporate the NPIRs. If there is a reliability concern or ambiguity that NPIRs are not included in the appropriate planning analyses, then a clarification such as adding “Near-Term Transmission Planning Horizon” to the body of Requirement R3 should be considered.

- Similarly, Requirement R4 may benefit from additional clarification on the type of "operating analyses" into which the applicable Transmission Entities must incorporate the NPIRs. If there is a reliability concern that the language is not broad enough to address all applicable time frames for operating analyses, then a clarification such as adding “same day" to the time horizons of the Requirement should be considered.

- While the PRT asserts that there is no reliability concern in the existing Requirement and Sub-parts that would warrant immediate revisions, it notes that Requirement R9 may not adequately
address inclusion of NPIRs that are based on Bulk-Electric System (BES) requirements (if applicable). Therefore, the agreement(s) developed in accordance with NUC-001-3 may benefit from a provision to address such NPIRs if specified by one or more applicable Transmission Entities. A new Sub-part may clarify the intended "balance" between the NPIRs of Nuclear Plant Generator Operators that are based on Nuclear Plant Licensing Requirements (NPLRs) and the requirements of a Transmission Entity that are based on BES requirements that support the NPLRs.

Questions

1. NUC-001-3, Requirement R1 states that “The Nuclear Plant Generator Operator shall provide the proposed NPIRs in writing to the applicable Transmission Entities and shall verify receipt.” For clarification, the PRT recommends that a future revision consider revising “proposed” to “proposed new or revised NPIRs,” as noted above. Do you agree with the PRT’s assertion that this observation does not warrant immediate revisions to the Standard? If not, please explain your rationale.
   - Yes
   - No
   Comments:

2. NUC-001-3, Requirement R3 states that “Transmission Entities shall incorporate the NPIRs into their planning analyses of the electric system...”

   The PRT seeks industry comment on whether or not the planning analyses should be better defined to align with the Glossary of Terms Used in NERC Reliability Standards (e.g., Near-Term Transmission Planning Horizon and/or Long-Term Transmission Planning Horizon). Do you agree with the PRT’s assertion that this observation does not warrant immediate revisions to the Standard? If not, please explain your rationale.
   - Yes
   - No
   Comments:

3. Currently, the Time Horizons in NUC-001-3, Requirement R4 are listed as Operations Planning and Real-time Operations. The PRT contends that while the Time Horizons should also include Same-day, it asserts that this observation does not warrant immediate revisions to the Standard. Do you agree with this assertion? If not, please explain your rationale.
   - Yes
   - No
   Comments:
4. While the PRT agrees that the following observation does not warrant immediate revisions, it identified a potential new Sub-part for Requirement R9 to clarify that some Transmission Entities may rely on specific Bulk Electric System requirements to support NPLRs and therefore recommends clarification by adding the following new Sub-part:

9.2.4 Any Agreement that includes NPIR(s) proposed by a Nuclear Plant Generator Operator shall also include NPIR(s) based on Bulk Electric System requirements to support the NPLRs if specified by one or more Transmission Entities.

Do you agree with the PRT’s assertion that this observation does not warrant immediate revisions to the Standard? If not, please explain your rationale.

☐ Yes
☐ No
Comments:

5. The PRT identified a number of potential errata (i.e., administrative) clarifications listed in the NUC-001-3 EPR Template. If you disagree with any of the observations, provide your rationale.

☐ Yes
☐ No
Comments:

We agree as long as the errata changes do not include the following from the EPR Template: “The locally defined term “Transmission Entity” within the Reliability Standard should be re-examined.” We do not believe the term needs to be re-examined; changes to this term may result in the need to revise Agreements which would not be a productive exercise for entities to be forced to undertake.

6. The team considered the cost effectiveness of the standard and did not identify a concern related to cost effectiveness as drafted. Do you agree? If not, please provide additional detail.

☐ Yes
☐ No
Comments:
7. Given the observations detailed in the NUC-001-3 template, the PRT’s preliminary recommendation is to defer the suggested clarifications for later consideration; therefore, developing a draft Standard Authorization Request now is not necessary. Do you agree with the PRT’s assertion that the Reliability Standard: (i) does not need immediate modification through standards development; (ii) is sufficient to protect reliability; and (iii) meets the reliability objective of the standard? If not, please provide your rationale.

☐ Yes
☐ No
Comments:

8. If you have any other comments on this review that you haven’t already mentioned above, please provide them here.

Comments:

No changes are recommended for Section D (Regional Variances) of the NERC standard NUC-001-3 as it is still applicable to Canadian (CANDU) Nuclear Power Plants.