Unofficial Comment Form for 3rd Draft of PRC-005-2: Protection System Maintenance

Project 2007-17

Please **DO NOT** use this form to submit comments on the 3rd draft of the standard for Protection System Maintenance. Please submit comments using the [electronic comment form](http://www.nerc.com/filez/standards/Protection_System_Maintenance_Project_2007-17.html). Comments must be submitted by **June 27, 2012**. If you have questions please contact Al McMeekin at al.mcmeekin@nerc.net or by telephone at 803-530-1963.

**Background Information:**
The standard recently passed ballot with a quorum of 84.32% and weighted segment approval of 73.93%; for the VRF/VSL Non-binding poll the quorum was 80.72% with 64.88% casting a supporting opinion. The drafting team appreciates the affirmative votes and the constructive feedback provided by the commenters. The team modified the standard based on stakeholder comments and has posted the standard, implementation plan, and other supporting documents for a parallel 30-day formal comment period and 10-day successive ballot through June 27, 2012.

The Protection System Maintenance and Testing Standard Drafting Team (PSMT SDT) made several changes to PRC-005-2, including the associated definitions, based on comments received from industry. The changes include:

- **Definition of Protection System Maintenance Program (PSMP):** Revised the “Inspect” element of the definition to “Examine for signs of component failure, reduced performance or degradation.”

- **Definition of Unresolved Maintenance Issues:** Revised the definition for additional clarity. The definition now reads: “A deficiency identified during a maintenance activity that causes the component to not meet the intended performance, cannot be corrected during the maintenance interval, and requires follow-up corrective action.”

- **Definition of Countable Event:** Revised the definition to “A failure of a Component requiring repair or replacement, any condition discovered during the maintenance activities in Tables 1-1 through 1-5 and Table 3 which requires corrective action or a Misoperation attributed to hardware failure or calibration failure. Misoperations due to product design errors, software errors, relay settings different from specified settings, Protection System Component configuration errors, or Protection System application errors are not included in Countable Events.”
- **Applicability**: Clarified Applicability clause 4.2.5.4 to “Protection Systems for station service or excitation transformers connected to the generator bus of generators which are part of the BES, that act to trip the generator either directly or via lockout or tripping auxiliary relays.”

- **Table 1-2 Component Type – Communication Systems**: The interval for the second portion of the first row of the Table was changed from 6 years to 12 years, and extensive changes were made to the last row of the Table.

- Several activities within Table 1-4a, Table 1-4b, Table 1-4c, Table 1-4d, and Table 1-4f, relating to verification that the station battery can perform properly, were modified with the assistance of representatives of the IEEE Stationary Battery Committee. **Note: Please see the Section 15.4 of the Supplementary Reference for background information on these changes.**

- The VSLs for Requirement R2 were modified from “reduce Countable Events to less than 4%” to “reduce Countable Events to no more than 4%.”

- The Supplemental Reference and FAQ document was revised to reflect changes made to the draft standard and to address additional issues raised within comments.
You do not have to answer all questions. Enter All Comments in Simple Text Format.

For questions 1 and 2, please provide specific comments related to the individual question. Please reserve question 3 for general comments not related to questions 1 and 2. Comments not related to the specific question will not be addressed.

*Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.*

1. In response to stakeholder input, the SDT made several changes to the standard and associated definitions as detailed below:
   - Revised the “Inspect” element of the definition of Protection System Maintenance Program (PSMP), the definition of the term Unresolved Maintenance Issues, and the definition of the term Countable Event.
   - Revised Clause 4.2.5.4 of the Applicability section of the standard.
   - Revised Table 1-2 “Component Type - Communications Systems.”
   - Revised Tables 1-4a, 1-4b, 1-4c, 1-4d, and 1-4f “Component Type - Protection System Station dc Supply....”

   Do you agree with these changes? If not, please indicate which changes you do not agree with and provide specific suggestions in the comment area for improvements that would allow you to support the standard.

   ☑ Yes
   ☐ No

   Comments:

2. The SDT made complementary changes in the “Supplementary Reference and FAQ Document” to provide supporting discussion for the Requirements within the standard. Do you have any specific suggestions for further improvements?

   ☐ Yes
   ☑ No

   Comments:

3. If you have any other comments that you have NOT provided in response to the above questions, please provide them here. (Please do not repeat comments that you provided elsewhere.)

   Comments: