Unofficial Comment Form
Project 2012-13 Nuclear Plant Interface Coordination
Standard Authorization Request

Please DO NOT use this form for submitting comments. Please use the electronic form to submit comments on the Standard Authorization Request (SAR). The electronic comment form must be completed by 8 p.m. Eastern on Thursday, March 13, 2014.

All documents and information about this project are available on the project page. If you have questions please contact Stephen Eldridge or by telephone at 404-446-9686.

Background Information
The Standards Committee assigned seven subject matter experts to review the standard NUC-001-2.1 as part of NERC’s obligation to conduct periodic reviews of its standards. The Five-Year Review Team concluded that NUC-001-2.1 remains necessary for reliability by requiring coordination between Nuclear Plant Generator Operators and Transmission Entities to ensure nuclear plant safe operation and shutdown. The standard, however, requires revision to provide greater clarity and to sharpen industry focus on tasks that have a more direct impact on reliability.

The NUC FYRT’s draft recommendation was posted for a 45-day comment period from July 26, 2013 through September 9, 2013. The NUC FYRT’s recommendations as well as the associated documents are available on the NUC FYRT Project Page.

Stakeholders provided feedback on the draft recommendation and associated documents, including a proposed redlined standard and a draft SAR. Comments were generally supportive of the NUC FYRT’s recommendation and proposed implementation. However, the NUC FYRT carefully reviewed each comment, and after further discussion with NUC FYRT members and industry observers the final recommendation to revise the standard and the accompanying documents were updated to adopt many of the commenters’ suggestions.

On October 17th, 2013 the NERC Standards Committee took the following actions in regard to the FYRT’s recommendations:

1. Accepted the work of the NUC FYRT.
2. Accepted the proposed Standard Authorization Request for standard development and authorized posting for informal comment; and
3. Appointed the existing NUC FYRT members as the standard drafting team to implement the recommendation in a formal standard development project.
Questions

1. Do you agree with the scope and objectives of this SAR? If not, please explain why you do not agree, and, if possible, provide specific language revisions that would make it acceptable to you.
   
   Yes:
   No: X
   
   Comments: The proposed revisions of NUC-001-2.1 are not in depth enough to address P.81 and the consolidation of redundant requirements. Specifically Part R9.2.1 should be retired because it is administrative and does not directly support the reliability of the BES. In addition, there are requirements in NUC-001 that should be moved to other standards. For example, Requirement R3 should be moved to TPL-001-4, IRO-010-1a R1; Part R9.3.5 should be moved to EOP-005-2, EOP-006-2; Part R9.3.6 moved to CIP Standards; Part R9.4.5 moved to PER-005-1. NUC-001 should focus on the creation and communication of NPIRs by Nuclear Plant Generator Operators. The other standards should have requirements where applicable to implement the necessary controls around the NPIRs to ensure Nuclear Plants do not violate their NPLRs.

2. Are you aware of any Canadian provincial or other regulatory requirements that may need to be considered during this project in order to develop a continent-wide approach to the standards? If yes, please identify the jurisdiction and specific regulatory requirements.
   
   Yes:
   No: X
   
   Comments:

3. Are there any other concerns with this SAR that haven’t been covered in previous questions?
   
   Yes: X
   No:
   
   Comments:

   1. Making Nuclear Plant Generator Operator plural is not necessary.
   2. Agree that R5 should be revised for consistency with R4 and to clarify that nuclear plants must be operated to meet the Nuclear Plant Interface Requirements.
3. The SDT proposes to replace the ambiguous term “Protection Systems” with language to clarify requirement applicability. To avoid complicating the Requirements, recommend the SDT include a Rationale Box for R7 and R8 that addresses the original Drafting Team’s intent to identify what information is to be shared by affected entities. Consider adding the parenthetical (e.g. protection system relay set-points) to R7 following “nuclear plant design”, and to R8 following “electric system design”.

4. Agree that R9 and R9.4.1 should be revised to clarify requirement applicability.

5. Disagree that Section E. Regional Differences should be revised to remove reference to specific Nuclear Regulatory Commission regulations and to clarify that there are no Canadian Regulatory requirements for electrical power from the electric network to permit safe shutdown. At a minimum a footnote should be provided for source of requirement (i.e. it is the NRC’s NPLR’s that drive most of the NPIRs being identified).

6. Adding Time Horizons to each requirement is appropriate.