Project 2007-17 Protection System Maintenance and Testing

Please **DO NOT** use this form. Please use the [electronic comment form](http://www.nerc.com/filez/standards/Protection_System_Maintenance_Project_2007-17.html) on the project page at the link below to submit comments on the second draft of the PRC-005-2 standard for Protection System Maintenance and Testing. Comments must be submitted by **March 28, 2012**. If you have questions please contact Al McMeekin at [al.mcmeekin@nerc.net](mailto:al.mcmeekin@nerc.net) or by telephone at 803-530-1963.

**Background Information:**
This project recently failed to receive two-thirds weighted stakeholder approval on the most recent initial ballot of PRC-005-2. The Protection System Maintenance and Testing Standard Drafting Team (PSMT SDT) has made several changes to PRC-005-2 based on comments received from industry. The changes include:

- Revised Requirement R1 to state that an entity’s Protection System Maintenance Program (PSMP) shall include for each Protection System component type: an identification of the maintenance method(s) used, and the identification of the relevant monitoring attributes applied.

- Separated Requirement R3 into three requirements:
  - Requirement R3 now requires an entity utilizing a time-based program to maintain its Protection System components in accordance with the maximum maintenance intervals listed in the Tables. This change removes the compliance jeopardy associated with an entity having more stringent intervals (in its PSMP) than those listed in the Tables.
  - Requirement R4 (new) requires an entity utilizing a performance-based program to maintain its Protection System components in accordance with its performance-based Protection System Maintenance Program.
  - Requirement R5 (new) requires an entity to demonstrate efforts to correct identified unresolved maintenance issues. The previous language in Requirement R3 directed that an entity initiate resolution.
• Modified the VSLs to reflect the changes listed above.

• The Supplemental Reference and FAQ document was revised to reflect changes made to the draft standard and to address additional issues raised within comments.

The PSMT SDT is posting this standard for a formal 30-day comment period and successive ballot.

For questions 1-3, please provide specific comments related to the individual question. Please reserve question 4 for general comments not related to questions 1-3.

1. In response to comments, the PSMTSDT revised Requirement R1 to state that an entity’s Protection System Maintenance Program (PSMP) shall include, for each Protection System component type, an identification of the maintenance method(s) used, and the identification of the relevant monitoring attributes applied. Do you agree with this change? If you do not agree, please provide specific suggestions for improvement.

☐ Yes
☐ No

Comments:

2. As a result of the changes to Requirement R1, the previous Requirement R3 was separated into three requirements:

   a. Requirement R3 now requires that an entity utilizing a time-based program maintain its Protection System components in accordance with the maximum maintenance intervals listed in the Tables. This change removes the compliance jeopardy associated with an entity having more stringent intervals (in its PSMP) than those listed in the Tables.

   b. Requirement R4 (new) requires an entity utilizing a performance-based program maintain its Protection System components in accordance with its performance based Protection System Maintenance Program.

   c. Requirement R5 (new) requires an entity to demonstrate efforts to correct identified unresolved maintenance issues. The previous language in Requirement R3 directed that an entity initiate resolution.

Do you agree with this change? If you do not agree, please provide specific suggestions for improvement.

☐ Yes
☐ No

Comments:
3. The Supplemental Reference and FAQ document was revised to reflect changes made to the draft standard and to address additional issues raised. Do you agree with the changes? If you do not agree, please provide specific suggestions for improvement.

☐ Yes
☐ No

Comments:

4. If you have any other comments on this Standard that you have not already provided in response to the prior questions, please provide them here.

Comments: