Unofficial Comment Form
Project 2011-INT-02 - Rapid Revision to Address Interpretation of VAR-002 for Constellation

Please DO NOT use this form for submitting comments. Please use the electronic form to submit comments on the revisions to the VSLs for Requirement R2. The electronic comment form must be completed by July 27, 2012. If you have questions please contact Scott Barfield at scott.barfield@nerc.net or by telephone at 404.446.9698.

Background Information

In response to industry comments, the Drafting Team has made revisions to the VSLs for Requirement R2. The Drafting Team is soliciting stakeholder input on the modifications to the VSLs.

Enter all comments in simple text format. Bullets, numbers, and special formatting will not be retained.

Questions

1. Do you agree with the revisions to the VSLs for Requirement R2? If No, please provide specific suggestions for improvement.

☐ Yes
☒ No

Comments: The time periods in the VSL are excessive. For real time operations, a Generator Operator not meeting the 45 minutes (Lower VSL for example) reduces reliability--both in normal and emergency operating scenarios. For all the VSLs for R2, the time periods should not be changed. Also, are the time periods cumulative, for just one incident, for a day, for a week?