

Standard PRC-005-X – Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance

Standard Development Timeline

This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.

Development Steps Completed

1. SAR posted for comment February 13, 2014 – March 14, 2014.

Description of Current Draft

The Protection System Maintenance and Testing Standard Drafting Team (PSMT SDT) is posting draft 1 of PRC-005-X for a 45-day comment period and ballot in the last ten days of the comment period under the new Standards Process Manual (Effective: June 26, 2013).

This draft contains the technical content of the standard. A parallel effort in the Project 2014-01, Standards Applicability for Dispersed Generation Resources, will post an applicability change to PRC-005-2 and PRC-005-3 for comment and ballot.

Anticipated Actions	Anticipated Date
45-day Formal Comment Period with Parallel Ballot	April 17 – June 2, 2014
45-day Additional Formal Comment Period with Parallel Ballot (if necessary)	July 21, – September 3, 2014
Final ballot	September 15, 2014
BOT adoption	November 2014

Definitions of Terms Used in Standard

This section includes all newly defined or revised terms used in the proposed standard. Terms already defined in the Reliability Standards Glossary of Terms (Glossary) are not repeated here. New or revised definitions listed below become approved when the proposed standard is approved. When the standard becomes effective, this defined term will be removed from the individual standard and added to the Glossary.

Protection System Maintenance Program (PSMP) — An ongoing program by which Protection System, Automatic Reclosing, and Sudden Pressure Relaying Components are kept in working order and proper operation of malfunctioning components is restored. A maintenance program for a specific Component includes one or more of the following activities:

- Verify — Determine that the Component is functioning correctly.
- Monitor — Observe the routine in-service operation of the Component.
- Test — Apply signals to a Component to observe functional performance or output behavior, or to diagnose problems.
- Inspect — Examine for signs of Component failure, reduced performance or degradation.
- Calibrate — Adjust the operating threshold or measurement accuracy of a measuring element to meet the intended performance requirement.

See Section A.6, Definitions Used in this Standard, for additional definitions that are new or modified for use within this standard.

Standard PRC-005-X – Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance

When this standard has received ballot approval, the text boxes will be moved to the Application Guidelines Section of the Standard.

A. Introduction

- 1. Title:** Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance
- 2. Number:** PRC-005-X
- 3. Purpose:** To document and implement programs for the maintenance of all Protection Systems, Automatic Reclosing, and Sudden Pressure Relaying affecting the reliability of the Bulk Electric System (BES) so that they are kept in working order.

Rationale for Applicability Section: This section does not reflect the applicability changes that will be proposed by the Project 2014-01 Standards Applicability for Dispersed Generation Resources standards drafting team.

4. Applicability:

4.1. Functional Entities:

- 4.1.1 Transmission Owner
- 4.1.2 Generator Owner
- 4.1.3 Distribution Provider
- 4.1.4 Balancing Authority

4.2. Facilities:

- 4.2.1 Protection Systems and Sudden Pressure Relaying that are installed for the purpose of detecting Faults on BES Elements (lines, buses, transformers, etc.)
- 4.2.2 Protection Systems used for underfrequency load-shedding systems installed per ERO underfrequency load-shedding requirements.
- 4.2.3 Protection Systems used for undervoltage load-shedding systems installed to prevent system voltage collapse or voltage instability for BES reliability.
- 4.2.4 Protection Systems installed as a Special Protection System (SPS) for BES reliability.
- 4.2.5 Protection Systems for generator Facilities that are part of the BES, including:
 - 4.2.5.1 Protection Systems that act to trip the generator either directly or via lockout or auxiliary tripping relays.

4.2.5.2 Protection Systems and Sudden Pressure Relaying for generator step-up transformers for generators that are part of the BES.

4.2.5.3 Protection Systems for transformers connecting aggregated generation, where the aggregated generation is part of the BES (e.g., transformers connecting facilities such as wind-farms to the BES).

4.2.5.4 Protection Systems and Sudden Pressure Relaying 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.

4.2.6 Automatic Reclosing¹, including:

4.2.6.1 Automatic Reclosing applied on the terminals of Elements connected to the BES bus located at generating plant substations where the total installed gross generating plant capacity is greater than the gross capacity of the largest BES generating unit within the Balancing Authority Area.

4.2.6.2 Automatic Reclosing applied on the terminals of all BES Elements at substations one bus away from generating plants specified in Section 4.2.6.1 when the substation is less than 10 circuit-miles from the generating plant substation.

4.2.6.3. Automatic Reclosing applied as an integral part of an SPS specified in Section 4.2.4.

5. Effective Date: See Implementation Plan

6. Definitions Used in this Standard:

Automatic Reclosing – Includes the following Components:

- Reclosing relay
- Control circuitry associated with the reclosing relay.

Sudden Pressure Relaying – A system that trips an interrupting device(s) to isolate the equipment it is monitoring and includes the following Components:

¹ Automatic Reclosing addressed in Section 4.2.7.1 and 4.2.7.2 may be excluded if the equipment owner can demonstrate that a close-in three-phase fault present for twice the normal clearing time (capturing a minimum trip-close-trip time delay) does not result in a total loss of gross generation in the Interconnection exceeding the gross capacity of the largest BES generating unit within the Balancing Authority Area where the Automatic Reclosing is applied.

Standard PRC-005-X – Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance

- Fault pressure relay – a mechanical relay or device that detects rapid changes in gas pressure, oil pressure, or oil flow that are indicative of Faults within liquid-filled, wire-wound equipment
- Control circuitry associated with a fault pressure relay

Unresolved Maintenance Issue – 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.

Segment – Components of a consistent design standard, or a particular model or type from a single manufacturer that typically share other common elements. Consistent performance is expected across the entire population of a Segment. A Segment must contain at least sixty (60) individual Components.

Component Type –

- Any one of the five specific elements of a Protection System.
- Any one of the two specific elements of Automatic Reclosing.
- Any one of the two specific elements of Sudden Pressure Relaying.

<p>Rationale for the deletion of part of the definition of Component: The SDT determined that it was explanatory in nature and adequately addressed in the Supplementary Reference and FAQ Document.</p>

Component – Any individual discrete piece of equipment included in a Protection System, Automatic Reclosing, or Sudden Pressure Relaying.

Countable Event – A failure of a Component requiring repair or replacement, any condition discovered during the maintenance activities in Tables 1-1 through 1-5, Table 3, Tables 4-1 through 4-2, and Table 5, which requires corrective action or a Protection System 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, Automatic Reclosing, or Sudden Pressure Relaying configuration or application errors are not included in Countable Events.

B. Requirements and Measures

- R1.** Each Transmission Owner, Generator Owner, and Distribution Provider shall establish a Protection System Maintenance Program (PSMP) for its Protection Systems, Automatic Reclosing, and Sudden Pressure Relaying identified in Section 4.2, Facilities. *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]*

The PSMP shall:

Standard PRC-005-X – Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance

- 1.1. Identify which maintenance method (time-based, performance-based per PRC-005 Attachment A, or a combination) is used to address each Protection System, Automatic Reclosing, and Sudden Pressure Relaying Component Type. All batteries associated with the station dc supply Component Type of a Protection System shall be included in a time-based program as described in Table 1-4 and Table 3.
 - 1.2. Include the applicable monitored Component attributes applied to each Protection System, Automatic Reclosing, and Sudden Pressure Relaying Component Type consistent with the maintenance intervals specified in Tables 1-1 through 1-5, Table 2, Table 3, Table 4-1 through 4-2, and Table 5 where monitoring is used to extend the maintenance intervals beyond those specified for unmonitored Protection System, Automatic Reclosing, and Sudden Pressure Relaying Components.
- M1.** Each Transmission Owner, Generator Owner and Distribution Provider shall have a documented Protection System Maintenance Program in accordance with Requirement R1.

For each Protection System, Automatic Reclosing, and Sudden Pressure Relaying Component Type, the documentation shall include the type of maintenance method applied (time-based, performance-based, or a combination of these maintenance methods), and shall include all batteries associated with the station dc supply Component Types in a time-based program as described in Table 1-4 and Table 3. (Part 1.1)

For Component Types that use monitoring to extend the maintenance intervals, the responsible entity(s) shall have evidence for each Protection System, Automatic Reclosing, and Sudden Pressure Relaying Component Type (such as manufacturer's specifications or engineering drawings) of the appropriate monitored Component attributes as specified in Tables 1-1 through 1-5, Table 2, Table 3, Table 4-1 through 4-2, and Table 5. (Part 1.2)
- R2.** Each Transmission Owner, Generator Owner, and Distribution Provider that uses performance-based maintenance intervals in its PSMP shall follow the procedure established in PRC-005 Attachment A to establish and maintain its performance-based intervals. [*Violation Risk Factor: Medium*] [*Time Horizon: Operations Planning*]
- M2.** Each Transmission Owner, Generator Owner, and Distribution Provider that uses performance-based maintenance intervals shall have evidence that its current performance-based maintenance program(s) is in accordance with Requirement R2, which may include, but is not limited to, Component lists, dated maintenance records, and dated analysis records and results.

Standard PRC-005-X – Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance

Rationale for R3 part 3.1 and 3.1.1.: The SDT, upon further reflection, determined that the PRC-005-3 Implementation Plan actually included a requirement that entities with newly-identified Automatic Reclosing Components implement its PSMP for those Components, and therefore determined that it was more appropriate to include this information in the standard rather than the implementation plan.

- R3.** Each Transmission Owner, Generator Owner, and Distribution Provider that utilizes time-based maintenance program(s) shall, except as provided in part 3.1, maintain its Protection System, Automatic Reclosing, and Sudden Pressure Relaying Components that are included within the time-based maintenance program in accordance with the minimum maintenance activities and maximum maintenance intervals prescribed within Tables 1-1 through 1-5, Table 2, Table 3, Table 4-1 through 4-2, and Table 5. *[Violation Risk Factor: High] [Time Horizon: Operations Planning]*
- 3.1.** For each newly-identified Automatic Reclosing Component following a notification under Requirement R6, each Transmission Owner, Generator Owner, and Distribution Provider shall perform maintenance activities or provide documentation of prior maintenance activities according to either 3.1.1 or 3.1.2.
- 3.1.1.** Complete the maintenance activities prescribed within Tables 4-1, 4-2(a), and 4-2(b) for the newly-identified Automatic Reclosing Component prior to the end of the third calendar year following the notification under Requirement R6; or
- 3.1.2.** Provide documentation that the Automatic Reclosing Component was last maintained in accordance with the minimum maintenance activities and maximum maintenance intervals prescribed within Tables 4-1, 4-2(a), and 4-2(b).
- M3.** Each Transmission Owner, Generator Owner, and Distribution Provider that utilizes time-based maintenance program(s) shall have evidence that it has maintained its Protection System, Automatic Reclosing, and Sudden Pressure Relaying Components included within its time-based program in accordance with Requirement R3. The evidence may include, but is not limited to, dated maintenance records, dated maintenance summaries, dated check-off lists, dated inspection records, or dated work orders.

Rationale for R4 part 4.1 and 4.1.1.: The SDT, upon further reflection, determined that the PRC-005-3 Implementation Plan actually included a requirement that entities with newly-identified Automatic Reclosing Components implement its PSMP for those Components, and therefore determined that it was more appropriate to include this information in the standard rather than the implementation plan.

- R4.** Each Transmission Owner, Generator Owner, and Distribution Provider that utilizes performance-based maintenance program(s) in accordance with Requirement R2

Standard PRC-005-X – Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance

shall, except as provided in part 4.1, implement and follow its PSMP for its Protection System, Automatic Reclosing, and Sudden Pressure Relaying Components that are included within the performance-based program(s). *[Violation Risk Factor: High]*
[Time Horizon: Operations Planning]

- 4.1.** For each newly-identified Automatic Reclosing Component following a notification under Requirement R6, each Transmission Owner, Generator Owner, and Distribution Provider shall perform maintenance activities or provide documentation of prior maintenance activities according to either 4.1.1 or 4.1.2.
 - 4.1.1.** Complete the maintenance activities prescribed within Tables 4-1, 4-2(a), and 4-2(b) for the newly-identified Automatic Reclosing Component prior to the end of the third calendar year following the notification under Requirement R6; or
 - 4.1.2.** Provide documentation that the Automatic Reclosing Component was last maintained in accordance with the minimum maintenance activities and maximum maintenance intervals prescribed within Tables 4-1, 4-2(a), and 4-2(b).
- M4.** Each Transmission Owner, Generator Owner, and Distribution Provider that utilizes performance-based maintenance intervals in accordance with Requirement R2 shall have evidence that it has implemented the Protection System Maintenance Program for the Protection System, Automatic Reclosing, and Sudden Pressure Relaying Components included in its performance-based program in accordance with Requirement R4. The evidence may include, but is not limited to, dated maintenance records, dated maintenance summaries, dated check-off lists, dated inspection records, or dated work orders.
- R5.** Each Transmission Owner, Generator Owner, and Distribution Provider shall demonstrate efforts to correct identified Unresolved Maintenance Issues. *[Violation Risk Factor: Medium]* *[Time Horizon: Operations Planning]*
- M5.** Each Transmission Owner, Generator Owner, and Distribution Provider shall have evidence that it has undertaken efforts to correct identified Unresolved Maintenance Issues in accordance with Requirement R5. The evidence may include, but is not limited to, work orders, replacement Component orders, invoices, project schedules with completed milestones, return material authorizations (RMAs) or purchase orders.

<p>Rationale for R6: The information addressed in Requirement R6 is necessary for Transmission Owners, Generator Owners, and Distribution Provides to accurately apply Section 4.2.7, Applicability. The Balancing Authority is the entity that maintains the information and should have the responsibility to provide this information to the applicable entities. The drafting team reconsidered the inclusion of the Balancing Authority and determined it is appropriate to include the requirement the standard. This</p>
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requirement may be relocated to another standard during future reviews of standards for quality and content.

The periodicity was chosen to balance the needs of the Transmission Owner, Generator Owner, and Distribution Provider to obtain the information with the needs of the Balancing Authority to provide an accurate gross capacity (considering retirement or installation of generating units and/or changes in its Balancing Authority Area) in order to properly include Automatic Reclosing in a PSMP.

- R6.** Each Balancing Authority shall, at least once every calendar year with not more than 15 calendar months between notifications, notify each Transmission Owner, Generator Owner, and Distribution Provider within its Balancing Authority Area of the gross capacity, in MW or MVA, of the largest BES generating unit within the Balancing Authority Area. *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]*
- M6.** Each Balancing Authority shall have dated documentation that it notified each Transmission Owner, Generator Owner, and Distribution Provider in accordance with Requirement R6. Examples of evidence may include, but are not limited to, copies of correspondence, such as e-mails or memoranda.

C. Compliance

1. Compliance Monitoring Process

1.1. Compliance Enforcement Authority

As defined in the NERC Rules of Procedure, “Compliance Enforcement Authority” means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

1.2. Evidence Retention

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

The Transmission Owner, Generator Owner, Distribution Provider, and Balancing Authority shall each keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

For Requirement R1, the Transmission Owner, Generator Owner, and Distribution Provider shall each keep its current dated Protection System

Standard PRC-005-X – Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance

Maintenance Program, as well as any superseded versions since the preceding compliance audit, including the documentation that specifies the type of maintenance program applied for each Protection System Component Type.

For Requirement R2, Requirement R3, Requirement R4, and Requirement R5, the Transmission Owner, Generator Owner, and Distribution Provider shall each keep documentation of the most recent performance of each distinct maintenance activity for the Protection System, Automatic Reclosing, or Sudden Pressure Relaying Component, or all performances of each distinct maintenance activity for the Protection System, Automatic Reclosing, or Sudden Pressure Relaying Component since the previous scheduled audit date, whichever is longer.

For Requirement R6, the Balancing Authority shall keep documentation for three calendar years that it provided information identifying the largest BES generating unit to the Transmission Owners, Generator Owners, and Distribution Providers in its Balancing Authority Area.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

1.3. Compliance Monitoring and Assessment Processes:

- Compliance Audits
- Self-Certifications
- Spot Checking
- Compliance Violation Investigations
- Self-Reporting
- Complaints

1.4. Additional Compliance Information

None

Standard PRC-005-X – Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance

Table of Compliance Elements

Requirement Number	Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	The entity’s PSMP failed to specify whether one Component Type is being addressed by time-based or performance-based maintenance, or a combination of both (part 1.1).	The entity’s PSMP failed to specify whether two Component Types are being addressed by time-based or performance-based maintenance, or a combination of both (part 1.1).	<p>The entity’s PSMP failed to specify whether three Component Types are being addressed by time-based or performance-based maintenance, or a combination of both. (part 1.1).</p> <p>OR</p> <p>The entity’s PSMP failed to include the applicable monitoring attributes applied to each Component Type consistent with the maintenance intervals specified in Tables 1-1 through 1-5, Table 2, Table 3, Tables 4-1 through 4-2, and Table 5 where monitoring is used to extend the maintenance intervals beyond those specified for unmonitored Components (part 1.2).</p>	<p>The entity failed to establish a PSMP.</p> <p>OR</p> <p>The entity’s PSMP failed to specify whether four or more Component Types are being addressed by time-based or performance-based maintenance, or a combination of both (part 1.1).</p> <p>OR</p> <p>The entity’s PSMP failed to include applicable station batteries in a time-based program (part 1.1).</p>
R2	The entity uses performance-based maintenance intervals in its PSMP but failed to reduce Countable Events to no more than 4% within three years.	NA	The entity uses performance-based maintenance intervals in its PSMP but failed to reduce Countable Events to no more than 4% within four years.	<p>The entity uses performance-based maintenance intervals in its PSMP but:</p> <ol style="list-style-type: none"> 1) Failed to establish the technical justification described within Requirement R2 for the initial use of the performance-based PSMP <p>OR</p> <ol style="list-style-type: none"> 2) Failed to reduce Countable Events to no more than 4% within five years <p>OR</p>

Standard PRC-005-X – Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance

Requirement Number	Lower VSL	Moderate VSL	High VSL	Severe VSL
				3) Maintained a Segment with less than 60 Components OR 4) Failed to: <ul style="list-style-type: none"> • Annually update the list of Components, OR • Annually perform maintenance on the greater of 5% of the Segment population or 3 Components, OR • Annually analyze the program activities and results for each Segment.
R3	For Components included within a time-based maintenance program, the entity failed to maintain 5% or less of the total Components included within a specific Component Type in accordance with the minimum maintenance activities and maximum maintenance intervals prescribed within Tables 1-1 through 1-5, Table 2, Table 3, Tables 4-1 through 4-2, and Table 5. For Automatic Reclosing Components added to a time-based maintenance program per information from the Balancing	For Components included within a time-based maintenance program, the entity failed to maintain more than 5% but 10% or less of the total Components included within a specific Component Type in accordance with the minimum maintenance activities and maximum maintenance intervals prescribed within Tables 1-1 through 1-5, Table 2, Table 3, Tables 4-1 through 4-2, and Table 5. For Automatic Reclosing Components added to a time-based maintenance program per	For Components included within a time-based maintenance program, the entity failed to maintain more than 10% but 15% or less of the total Components included within a specific Component Type in accordance with the minimum maintenance activities and maximum maintenance intervals prescribed within Tables 1-1 through 1-5, Table 2, Table 3, Tables 4-1 through 4-2, and Table 5. For Automatic Reclosing Components added to a time-based maintenance program per	For Components included within a time-based maintenance program, the entity failed to maintain more than 15% of the total Components included within a specific Component Type in accordance with the minimum maintenance activities and maximum maintenance intervals prescribed within Tables 1-1 through 1-5, Table 2, Table 3, Tables 4-1 through 4-2, and Table 5. For Automatic Reclosing Components added to a time-

Standard PRC-005-X – Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance

Requirement Number	Lower VSL	Moderate VSL	High VSL	Severe VSL
	<p>Authority, the entity failed to maintain 5% or less of the total Components in accordance with the minimum maintenance activities and maximum maintenance intervals prescribed within Tables 4-1 through 4-2.</p>	<p>information from the Balancing Authority, the entity failed to maintain more than 5% but 10% or less of the total Components in accordance with the minimum maintenance activities and maximum maintenance intervals prescribed within Tables 4-1 through 4-2.</p>	<p>information from the Balancing Authority, the entity failed to maintain more than 10% but 15% or less of the total Components in accordance with the minimum maintenance activities and maximum maintenance intervals prescribed within Tables 4-1 through 4-2.</p>	<p>based maintenance program per information from the Balancing Authority, the entity failed to maintain more than 15% of the total Components in accordance with the minimum maintenance activities and maximum maintenance intervals prescribed within Tables 4-1 through 4-2.</p>
R4	<p>For Components included within a performance-based maintenance program, the entity failed to maintain 5% or less of the annual scheduled maintenance for a specific Component Type in accordance with their performance-based PSMP.</p> <p>For Automatic Reclosing Components added to a performance-based maintenance program per information from the Balancing Authority, the entity failed to maintain 5% or less of the total Components in accordance with their performance-based PSMP.</p>	<p>For Components included within a performance-based maintenance program, the entity failed to maintain more than 5% but 10% or less of the annual scheduled maintenance for a specific Component Type in accordance with their performance-based PSMP.</p> <p>For Automatic Reclosing Components added to a performance-based maintenance program per information from the Balancing Authority, the entity failed to maintain more than 5% but 10% or less of the total Components in accordance with their performance-based PSMP.</p>	<p>For Components included within a performance-based maintenance program, the entity failed to maintain more than 10% but 15% or less of the annual scheduled maintenance for a specific Component Type in accordance with their performance-based PSMP.</p> <p>For Automatic Reclosing Components added to a performance-based maintenance program per information from the Balancing Authority, the entity failed to maintain more than 10% but 15% or less of the total Components in accordance with their performance-based PSMP.</p>	<p>For Components included within a performance-based maintenance program, the entity failed to maintain more than 15% of the annual scheduled maintenance for a specific Component Type in accordance with their performance-based PSMP.</p> <p>For Automatic Reclosing Components added to a performance-based maintenance program per information from the Balancing Authority, the entity failed to maintain more than 15% of the total Components in accordance with their performance-based PSMP.</p>

Standard PRC-005-X – Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance

Requirement Number	Lower VSL	Moderate VSL	High VSL	Severe VSL
R5	The entity failed to undertake efforts to correct 5 or fewer identified Unresolved Maintenance Issues.	The entity failed to undertake efforts to correct greater than 5 but less than or equal to 10 identified Unresolved Maintenance Issues.	The entity failed to undertake efforts to correct greater than 10 but less than or equal to 15 identified Unresolved Maintenance Issues.	The entity failed to undertake efforts to correct greater than 15 identified Unresolved Maintenance Issues.
R6				<p>The entity failed to notify each Transmission Owner, Generator Owner, and Distribution Provider within its Balancing Authority Area at least once every calendar year of the gross capacity, in MW or MVA, of the largest BES generating unit within the Balancing Authority Area.</p> <p style="text-align: center;">OR</p> <p>The entity had more than 15 calendar months between notifications to each Transmission Owner, Generator Owner, and Distribution Provider of the gross capacity, in MW or MVA, of the largest BES generating unit within the Balancing Authority Area.</p>

D. Regional Variances

None.

E. Interpretations

None.

F. Supplemental Reference Documents

Standard PRC-005-X – Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance

The following documents present a detailed discussion about determination of maintenance intervals and other useful information regarding establishment of a maintenance program.

1. *Supplementary Reference and FAQ - PRC-005-X Protection System Maintenance*, Protection System Maintenance and Testing Standard Drafting Team (April 2014)
2. *Considerations for Maintenance and Testing of Auto-reclosing Schemes*, NERC System Analysis and Modeling Subcommittee, and NERC System Protection and Control Subcommittee (November 2012)

Sudden Pressure Relays and Other Devices that Respond to Non-Electrical Quantities – SPCS Input for Standard Development in Response to FERC Order No. 758, NERC System Protection and Control Subcommittee (December 2013)

Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
1	December 1, 2005	<ol style="list-style-type: none">1. Changed incorrect use of certain hyphens (-) to “en dash” (–) and “em dash (—).”2. Added “periods” to items where appropriate.3. Changed “Timeframe” to “Time Frame” in item D, 1.2.	01/20/05
1a	February 17, 2011	Added Appendix 1 - Interpretation regarding applicability of standard to protection of radially connected transformers	Project 2009-17 interpretation
1a	February 17, 2011	Adopted by Board of Trustees	

Standard PRC-005-X – Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance

1a	September 26, 2011	FERC Order issued approving interpretation of R1 and R2 (FERC's Order is effective as of September 26, 2011)	
1.1a	February 1, 2012	Errata change: Clarified inclusion of generator interconnection Facility in Generator Owner's responsibility	Revision under Project 2010-07
1b	February 3, 2012	FERC Order issued approving interpretation of R1, R1.1, and R1.2 (FERC's Order dated March 14, 2012). Updated version from 1a to 1b.	Project 2009-10 Interpretation
1.1b	April 23, 2012	Updated standard version to 1.1b to reflect FERC approval of PRC-005-1b.	Revision under Project 2010-07

Standard PRC-005-X – Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance

1.1b	May 9, 2012	PRC-005-1.1b was adopted by the Board of Trustees as part of Project 2010-07 (Generator Requirements at the Transmission Interface).	
2	November 7, 2012	Adopted by Board of Trustees	Project 2007-17 - Complete revision, absorbing maintenance requirements from PRC-005-1.1b, PRC-008-0, PRC-011-0, PRC-017-0
2	October 17, 2013	Errata Change: The Standards Committee approved an errata change to the implementation plan for PRC-005-2 to add the phrase “or as otherwise made effective pursuant to the laws applicable to such ERO governmental authorities;” to the second sentence under the “Retirement of Existing	
3	November 7, 2013	Adopted by the NERC Board of Trustees	Revised to address the FERC directive in Order No.758 to include Automatic Reclosing in maintenance programs.
3.1	February 12, 2014	Approved by the Standards Committee	Errata changes to correct capitalization of defined terms
4			Project 2007-17.3 – Revised to address the FERC directive in Order No. 758 to include sudden pressure relays in maintenance programs.

Table 1-1 Component Type - Protective Relay Excluding distributed UFLS and distributed UVLS (see Table 3)		
Component Attributes	Maximum Maintenance Interval ²	Maintenance Activities
Any unmonitored protective relay not having all the monitoring attributes of a category below.	6 Calendar Years	For all unmonitored relays: <ul style="list-style-type: none"> • Verify that settings are as specified For non-microprocessor relays: <ul style="list-style-type: none"> • Test and, if necessary calibrate For microprocessor relays: <ul style="list-style-type: none"> • Verify operation of the relay inputs and outputs that are essential to proper functioning of the Protection System. • Verify acceptable measurement of power system input values.
Monitored microprocessor protective relay with the following: <ul style="list-style-type: none"> • Internal self-diagnosis and alarming (see Table 2). • Voltage and/or current waveform sampling three or more times per power cycle, and conversion of samples to numeric values for measurement calculations by microprocessor electronics. • Alarming for power supply failure (see Table 2). 	12 Calendar Years	Verify: <ul style="list-style-type: none"> • Settings are as specified. • Operation of the relay inputs and outputs that are essential to proper functioning of the Protection System. • Acceptable measurement of power system input values.

² For the tables in this standard, a calendar year starts on the first day of a new year (January 1) after a maintenance activity has been completed. For the tables in this standard, a calendar month starts on the first day of the first month after a maintenance activity has been completed.

Table 1-1 Component Type - Protective Relay Excluding distributed UFLS and distributed UVLS (see Table 3)		
Component Attributes	Maximum Maintenance Interval ²	Maintenance Activities
Monitored microprocessor protective relay with preceding row attributes and the following: <ul style="list-style-type: none"> • Ac measurements are continuously verified by comparison to an independent ac measurement source, with alarming for excessive error (See Table 2). • Some or all binary or status inputs and control outputs are monitored by a process that continuously demonstrates ability to perform as designed, with alarming for failure (See Table 2). • Alarming for change of settings (See Table 2). 	12 Calendar Years	Verify only the unmonitored relay inputs and outputs that are essential to proper functioning of the Protection System.

Table 1-2 Component Type - Communications Systems Excluding distributed UFLS and distributed UVLS (see Table 3)		
Component Attributes	Maximum Maintenance Interval	Maintenance Activities
Any unmonitored communications system necessary for correct operation of protective functions, and not having all the monitoring attributes of a category below.	4 Calendar Months	Verify that the communications system is functional.
	6 Calendar Years	Verify that the communications system meets performance criteria pertinent to the communications technology applied (e.g. signal level, reflected power, or data error rate). Verify operation of communications system inputs and outputs that are essential to proper functioning of the Protection System.
Any communications system with continuous monitoring or periodic automated testing for the presence of the channel function, and alarming for loss of function (See Table 2).	12 Calendar Years	Verify that the communications system meets performance criteria pertinent to the communications technology applied (e.g. signal level, reflected power, or data error rate). Verify operation of communications system inputs and outputs that are essential to proper functioning of the Protection System.
Any communications system with all of the following: <ul style="list-style-type: none"> • Continuous monitoring or periodic automated testing for the performance of the channel using criteria pertinent to the communications technology applied (e.g. signal level, reflected power, or data error rate, and alarming for excessive performance degradation). (See Table 2) • Some or all binary or status inputs and control outputs are monitored by a process that continuously demonstrates ability to perform as designed, with alarming for failure (See Table 2). 	12 Calendar Years	Verify only the unmonitored communications system inputs and outputs that are essential to proper functioning of the Protection System

Table 1-3 Component Type - Voltage and Current Sensing Devices Providing Inputs to Protective Relays Excluding distributed UFLS and distributed UVLS (see Table 3)		
Component Attributes	Maximum Maintenance Interval	Maintenance Activities
Any voltage and current sensing devices not having monitoring attributes of the category below.	12 Calendar Years	Verify that current and voltage signal values are provided to the protective relays.
Voltage and Current Sensing devices connected to microprocessor relays with AC measurements are continuously verified by comparison of sensing input value, as measured by the microprocessor relay, to an independent ac measurement source, with alarming for unacceptable error or failure (see Table 2).	No periodic maintenance specified	None.

Table 1-4(a) Component Type – Protection System Station dc Supply Using Vented Lead-Acid (VLA) Batteries Excluding distributed UFLS and distributed UVLS (see Table 3)		
Protection System Station dc supply used only for non-BES interrupting devices for SPS, non-distributed UFLS systems, or non-distributed UVLS systems is excluded (see Table 1-4(e)).		
Component Attributes	Maximum Maintenance Interval	Maintenance Activities
Protection System Station dc supply using Vented Lead-Acid (VLA) batteries not having monitoring attributes of Table 1-4(f).	4 Calendar Months	Verify: <ul style="list-style-type: none"> • Station dc supply voltage Inspect: <ul style="list-style-type: none"> • Electrolyte level • For unintentional grounds
	18 Calendar Months	Verify: <ul style="list-style-type: none"> • Float voltage of battery charger • Battery continuity • Battery terminal connection resistance • Battery intercell or unit-to-unit connection resistance Inspect: <ul style="list-style-type: none"> • Cell condition of all individual battery cells where cells are visible – or measure battery cell/unit internal ohmic values where the cells are not visible • Physical condition of battery rack

<p style="text-align: center;">Table 1-4(a) Component Type – Protection System Station dc Supply Using Vented Lead-Acid (VLA) Batteries Excluding distributed UFLS and distributed UVLS (see Table 3)</p> <p style="text-align: center;">Protection System Station dc supply used only for non-BES interrupting devices for SPS, non-distributed UFLS systems, or non-distributed UVLS systems is excluded (see Table 1-4(e)).</p>		
Component Attributes	Maximum Maintenance Interval	Maintenance Activities
	18 Calendar Months -or- 6 Calendar Years	Verify that the station battery can perform as manufactured by evaluating cell/unit measurements indicative of battery performance (e.g. internal ohmic values or float current) against the station battery baseline. -or- Verify that the station battery can perform as manufactured by conducting a performance or modified performance capacity test of the entire battery bank.

Table 1-4(b) Component Type – Protection System Station dc Supply Using Valve-Regulated Lead-Acid (VRLA) Batteries Excluding distributed UFLS and distributed UVLS (see Table 3)		
Protection System Station dc supply used only for non-BES interrupting devices for SPS, non-distributed UFLS systems, or non-distributed UVLS systems is excluded (see Table 1-4(e)).		
Component Attributes	Maximum Maintenance Interval	Maintenance Activities
Protection System Station dc supply with Valve Regulated Lead-Acid (VRLA) batteries not having monitoring attributes of Table 1-4(f).	4 Calendar Months	Verify: <ul style="list-style-type: none"> • Station dc supply voltage Inspect: <ul style="list-style-type: none"> • For unintentional grounds
	6 Calendar Months	Inspect: <ul style="list-style-type: none"> • Condition of all individual units by measuring battery cell/unit internal ohmic values.
	18 Calendar Months	Verify: <ul style="list-style-type: none"> • Float voltage of battery charger • Battery continuity • Battery terminal connection resistance • Battery intercell or unit-to-unit connection resistance Inspect: <ul style="list-style-type: none"> • Physical condition of battery rack

<p align="center">Table 1-4(b)</p> <p align="center">Component Type – Protection System Station dc Supply Using Valve-Regulated Lead-Acid (VRLA) Batteries</p> <p align="center">Excluding distributed UFLS and distributed UVLS (see Table 3)</p> <p align="center">Protection System Station dc supply used only for non-BES interrupting devices for SPS, non-distributed UFLS systems, or non-distributed UVLS systems is excluded (see Table 1-4(e)).</p>		
Component Attributes	Maximum Maintenance Interval	Maintenance Activities
	6 Calendar Months -or- 3 Calendar Years	Verify that the station battery can perform as manufactured by evaluating cell/unit measurements indicative of battery performance (e.g. internal ohmic values or float current) against the station battery baseline. -or- Verify that the station battery can perform as manufactured by conducting a performance or modified performance capacity test of the entire battery bank.

Table 1-4(c) Component Type – Protection System Station dc Supply Using Nickel-Cadmium (NiCad) Batteries Excluding distributed UFLS and distributed UVLS (see Table 3)		
Protection System Station dc supply used only for non-BES interrupting devices for SPS, non-distributed UFLS system, or non-distributed UVLS systems is excluded (see Table 1-4(e)).		
Component Attributes	Maximum Maintenance Interval	Maintenance Activities
Protection System Station dc supply Nickel-Cadmium (NiCad) batteries not having monitoring attributes of Table 1-4(f).	4 Calendar Months	Verify: <ul style="list-style-type: none"> • Station dc supply voltage Inspect: <ul style="list-style-type: none"> • Electrolyte level • For unintentional grounds
	18 Calendar Months	Verify: <ul style="list-style-type: none"> • Float voltage of battery charger • Battery continuity • Battery terminal connection resistance • Battery intercell or unit-to-unit connection resistance Inspect: <ul style="list-style-type: none"> • Cell condition of all individual battery cells. • Physical condition of battery rack

Table 1-4(c) Component Type – Protection System Station dc Supply Using Nickel-Cadmium (NiCad) Batteries Excluding distributed UFLS and distributed UVLS (see Table 3)		
Protection System Station dc supply used only for non-BES interrupting devices for SPS, non-distributed UFLS system, or non-distributed UVLS systems is excluded (see Table 1-4(e)).		
Component Attributes	Maximum Maintenance Interval	Maintenance Activities
	6 Calendar Years	Verify that the station battery can perform as manufactured by conducting a performance or modified performance capacity test of the entire battery bank.

Table 1-4(d) Component Type – Protection System Station dc Supply Using Non Battery Based Energy Storage Excluding distributed UFLS and distributed UVLS (see Table 3)		
Protection System Station dc supply used only for non-BES interrupting devices for SPS, non-distributed UFLS system, or non-distributed UVLS systems is excluded (see Table 1-4(e)).		
Component Attributes	Maximum Maintenance Interval	Maintenance Activities
Any Protection System station dc supply not using a battery and not having monitoring attributes of Table 1-4(f).	4 Calendar Months	Verify: <ul style="list-style-type: none"> • Station dc supply voltage Inspect: <ul style="list-style-type: none"> • For unintentional grounds
	18 Calendar Months	Inspect: Condition of non-battery based dc supply
	6 Calendar Years	Verify that the dc supply can perform as manufactured when ac power is not present.

Table 1-4(e) Component Type – Protection System Station dc Supply for non-BES Interrupting Devices for SPS, non-distributed UFLS, and non-distributed UVLS systems		
Component Attributes	Maximum Maintenance Interval	Maintenance Activities
Any Protection System dc supply used for tripping only non-BES interrupting devices as part of a SPS, non-distributed UFLS, or non-distributed UVLS system and not having monitoring attributes of Table 1-4(f).	When control circuits are verified (See Table 1-5)	Verify Station dc supply voltage.

Standard PRC-005-X – Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance

Table 1-4(f) Exclusions for Protection System Station dc Supply Monitoring Devices and Systems		
Component Attributes	Maximum Maintenance Interval	Maintenance Activities
Any station dc supply with high and low voltage monitoring and alarming of the battery charger voltage to detect charger overvoltage and charger failure (See Table 2).	No periodic maintenance specified	No periodic verification of station dc supply voltage is required.
Any battery based station dc supply with electrolyte level monitoring and alarming in every cell (See Table 2).		No periodic inspection of the electrolyte level for each cell is required.
Any station dc supply with unintentional dc ground monitoring and alarming (See Table 2).		No periodic inspection of unintentional dc grounds is required.
Any station dc supply with charger float voltage monitoring and alarming to ensure correct float voltage is being applied on the station dc supply (See Table 2).		No periodic verification of float voltage of battery charger is required.
Any battery based station dc supply with monitoring and alarming of battery string continuity (See Table 2).		No periodic verification of the battery continuity is required.
Any battery based station dc supply with monitoring and alarming of the intercell and/or terminal connection detail resistance of the entire battery (See Table 2).		No periodic verification of the intercell and terminal connection resistance is required.
Any Valve Regulated Lead-Acid (VRLA) or Vented Lead-Acid (VLA) station battery with internal ohmic value or float current monitoring and alarming, and evaluating present values relative to baseline internal ohmic values for every cell/unit (See Table 2).		No periodic evaluation relative to baseline of battery cell/unit measurements indicative of battery performance is required to verify the station battery can perform as manufactured.
Any Valve Regulated Lead-Acid (VRLA) or Vented Lead-Acid (VLA) station battery with monitoring and alarming of each cell/unit internal ohmic value (See Table 2).		No periodic inspection of the condition of all individual units by measuring battery cell/unit internal ohmic values of a station VRLA or Vented Lead-Acid (VLA) battery is required.

Table 1-5 Component Type - Control Circuitry Associated With Protective Functions Excluding distributed UFLS and distributed UVLS (see Table 3) Note: Table requirements apply to all Control Circuitry Components of Protection Systems, and SPSs except as noted.		
Component Attributes	Maximum Maintenance Interval	Maintenance Activities
Trip coils or actuators of circuit breakers, interrupting devices, or mitigating devices (regardless of any monitoring of the control circuitry).	6 Calendar Years	Verify that each trip coil is able to operate the circuit breaker, interrupting device, or mitigating device.
Electromechanical lockout devices which are directly in a trip path from the protective relay to the interrupting device trip coil (regardless of any monitoring of the control circuitry).	6 Calendar Years	Verify electrical operation of electromechanical lockout devices.
Unmonitored control circuitry associated with SPS. (See Table 4-2(b) for SPS which include Automatic Reclosing.)	12 Calendar Years	Verify all paths of the control circuits essential for proper operation of the SPS.
Unmonitored control circuitry associated with protective functions inclusive of all auxiliary relays.	12 Calendar Years	Verify all paths of the trip circuits inclusive of all auxiliary relays through the trip coil(s) of the circuit breakers or other interrupting devices.
Control circuitry associated with protective functions and/or SPSs whose integrity is monitored and alarmed (See Table 2).	No periodic maintenance specified	None.

Table 2 – Alarming Paths and Monitoring In Tables 1-1 through 1-5, Table 3, and Tables 4-1 through 4-2, alarm attributes used to justify extended maximum maintenance intervals and/or reduced maintenance activities are subject to the following maintenance requirements		
Component Attributes	Maximum Maintenance Interval	Maintenance Activities
Any alarm path through which alarms in Tables 1-1 through 1-5, Table 3, and Tables 4-1 through 4-2 are conveyed from the alarm origin to the location where corrective action can be initiated, and not having all the attributes of the “Alarm Path with monitoring” category below. Alarms are reported within 24 hours of detection to a location where corrective action can be initiated.	12 Calendar Years	Verify that the alarm path conveys alarm signals to a location where corrective action can be initiated.
Alarm Path with monitoring: The location where corrective action is taken receives an alarm within 24 hours for failure of any portion of the alarming path from the alarm origin to the location where corrective action can be initiated.	No periodic maintenance specified	None.

Standard PRC-005-X – Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance

Table 3 Maintenance Activities and Intervals for distributed UFLS and distributed UVLS Systems		
Component Attributes	Maximum Maintenance Interval	Maintenance Activities
Any unmonitored protective relay not having all the monitoring attributes of a category below.	6 Calendar Years	<p>Verify that settings are as specified.</p> <p>For non-microprocessor relays:</p> <ul style="list-style-type: none"> • Test and, if necessary calibrate. <p>For microprocessor relays:</p> <ul style="list-style-type: none"> • Verify operation of the relay inputs and outputs that are essential to proper functioning of the Protection System. • Verify acceptable measurement of power system input values.
<p>Monitored microprocessor protective relay with the following:</p> <ul style="list-style-type: none"> • Internal self-diagnosis and alarming (See Table 2). • Voltage and/or current waveform sampling three or more times per power cycle, and conversion of samples to numeric values for measurement calculations by microprocessor electronics. <p>Alarming for power supply failure (See Table 2).</p>	12 Calendar Years	<p>Verify:</p> <ul style="list-style-type: none"> • Settings are as specified. • Operation of the relay inputs and outputs that are essential to proper functioning of the Protection System. • Acceptable measurement of power system input values
<p>Monitored microprocessor protective relay with preceding row attributes and the following:</p> <ul style="list-style-type: none"> • Ac measurements are continuously verified by comparison to an independent ac measurement source, with alarming for excessive error (See Table 2). 	12 Calendar Years	<p>Verify only the unmonitored relay inputs and outputs that are essential to proper functioning of the Protection System.</p>

Standard PRC-005-X – Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance

Table 3 Maintenance Activities and Intervals for distributed UFLS and distributed UVLS Systems		
Component Attributes	Maximum Maintenance Interval	Maintenance Activities
<ul style="list-style-type: none"> Some or all binary or status inputs and control outputs are monitored by a process that continuously demonstrates ability to perform as designed, with alarming for failure (See Table 2). Alarming for change of settings (See Table 2).		
Voltage and/or current sensing devices associated with UFLS or UVLS systems.	12 Calendar Years	Verify that current and/or voltage signal values are provided to the protective relays.
Protection System dc supply for tripping non-BES interrupting devices used only for a UFLS or UVLS system.	12 Calendar Years	Verify Protection System dc supply voltage.
Control circuitry between the UFLS or UVLS relays and electromechanical lockout and/or tripping auxiliary devices (excludes non-BES interrupting device trip coils).	12 Calendar Years	Verify the path from the relay to the lockout and/or tripping auxiliary relay (including essential supervisory logic).
Electromechanical lockout and/or tripping auxiliary devices associated only with UFLS or UVLS systems (excludes non-BES interrupting device trip coils).	12 Calendar Years	Verify electrical operation of electromechanical lockout and/or tripping auxiliary devices.
Control circuitry between the electromechanical lockout and/or tripping auxiliary devices and the non-BES interrupting devices in UFLS or UVLS systems, or between UFLS or UVLS relays (with no interposing electromechanical lockout or auxiliary device) and the non-BES interrupting devices (excludes non-BES interrupting device trip coils).	No periodic maintenance specified	None.
Trip coils of non-BES interrupting devices in UFLS or UVLS systems.	No periodic maintenance specified	None.

Table 4-1 Maintenance Activities and Intervals for Automatic Reclosing Components Component Type – Reclosing Relay		
Component Attributes	Maximum Maintenance Interval	Maintenance Activities
Any unmonitored reclosing relay not having all the monitoring attributes of a category below.	6 Calendar Years	Verify that settings are as specified. For non-microprocessor relays: <ul style="list-style-type: none"> • Test and, if necessary calibrate For microprocessor relays: <ul style="list-style-type: none"> • Verify operation of the relay inputs and outputs that are essential to proper functioning of the Automatic Reclosing.
Monitored microprocessor reclosing relay with the following: <ul style="list-style-type: none"> • Internal self-diagnosis and alarming (See Table 2). • Alarming for power supply failure (See Table 2). 	12 Calendar Years	Verify: <ul style="list-style-type: none"> • Settings are as specified. • Operation of the relay inputs and outputs that are essential to proper functioning of the Automatic Reclosing.

Table 4-2(a) Maintenance Activities and Intervals for Automatic Reclosing Components Component Type – Control Circuitry Associated with Reclosing Relays that are NOT an Integral Part of an SPS		
Component Attributes	Maximum Maintenance Interval	Maintenance Activities
Unmonitored Control circuitry associated with Automatic Reclosing that is not an integral part of an SPS.	12 Calendar Years	Verify that Automatic Reclosing, upon initiation, does not issue a premature closing command to the close circuitry.
Control circuitry associated with Automatic Reclosing that is not part of an SPS and is monitored and alarmed for conditions that would result in a premature closing command. (See Table 2)	No periodic maintenance specified	None.

Table 4-2(b) Maintenance Activities and Intervals for Automatic Reclosing Components Component Type – Control Circuitry Associated with Reclosing Relays that ARE an Integral Part of an SPS		
Component Attributes	Maximum Maintenance Interval	Maintenance Activities
Close coils or actuators of circuit breakers or similar devices that are used in conjunction with Automatic Reclosing as part of an SPS (regardless of any monitoring of the control circuitry).	6 Calendar Years	Verify that each close coil or actuator is able to operate the circuit breaker or mitigating device.
Unmonitored close control circuitry associated with Automatic Reclosing used as an integral part of an SPS.	12 Calendar Years	Verify all paths of the control circuits associated with Automatic Reclosing that are essential for proper operation of the SPS.
Control circuitry associated with Automatic Reclosing that is an integral part of an SPS whose integrity is monitored and alarmed. (See Table 2)	No periodic maintenance specified	None.

Table 5 Maintenance Activities and Intervals for Sudden Pressure Relaying		
Component Attributes	Maximum Maintenance Interval	Maintenance Activities
Any fault pressure relay.	6 Calendar Years	Verify the pressure or flow sensing mechanism is operable.
Control circuitry associated with Sudden Pressure Relaying from the fault pressure relay to the interrupting device trip coil(s).	12 Calendar Years	Verify all paths of the control circuits that are essential for proper operation of the Sudden Pressure Relaying.

PRC-005 — Attachment A

Criteria for a Performance-Based Protection System Maintenance Program

Purpose: To establish a technical basis for initial and continued use of a performance-based Protection System Maintenance Program (PSMP).

To establish the technical justification for the initial use of a performance-based PSMP:

1. Develop a list with a description of Components included in each designated Segment, with a minimum **Segment** population of 60 Components.
2. Maintain the Components in each Segment according to the time-based maximum allowable intervals established in Tables 1-1 through 1-5, Table 3, Tables 4-1 through 4-2, and Table 5 until results of maintenance activities for the Segment are available for a minimum of 30 individual Components of the Segment.
3. Document the maintenance program activities and results for each Segment, including maintenance dates and Countable Events for each included Component.
4. Analyze the maintenance program activities and results for each Segment to determine the overall performance of the Segment and develop maintenance intervals.
5. Determine the maximum allowable maintenance interval for each Segment such that the Segment experiences **Countable Events** on no more than 4% of the Components within the Segment, for the greater of either the last 30 Components maintained or all Components maintained in the previous year.

To maintain the technical justification for the ongoing use of a performance-based PSMP:

1. At least annually, update the list of Components and Segments and/or description if any changes occur within the Segment.
2. Perform maintenance on the greater of 5% of the Components (addressed in the performance based PSMP) in each Segment or 3 individual Components within the Segment in each year.
3. For the prior year, analyze the maintenance program activities and results for each Segment to determine the overall performance of the Segment.
4. Using the prior year's data, determine the maximum allowable maintenance interval for each Segment such that the Segment experiences Countable Events on no more than 4% of the Components within the Segment, for the greater of either the last 30 Components maintained or all Components maintained in the previous year.

If the Components in a Segment maintained through a performance-based PSMP experience 4% or more Countable Events, develop, document, and implement an action plan to reduce the Countable Events to less than 4% of the Segment population within 3 years.