

**NERC Protection System Maintenance Standard
PRC-005-2**

**FREQUENTLY ASKED QUESTIONS -
Practical Compliance and Implementation**

November 17, 2010

Informative Annex to Standard PRC-005-2

Prepared by the

Protection System Maintenance and Testing Standard Drafting Team

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Introduction

The following is a draft collection of questions and answers that the PSMT SDT believes could be helpful to those implementing NERC Standard PRC-005-2 Protection System Maintenance. As the draft standard proceeds through development, this FAQ document will be revised, including responses to key or frequent comments from the posting process. The FAQ will be organized at a later time during the development of the draft Standard.

This FAQ document will support both the Standard and the associated Technical Reference document.

Executive Summary

- Write later if needed
-

Terms Used in PRC-005-2

Frequently Asked Questions

I General FAQs:

1. **The standard seems very complicated, and is difficult to understand. Can it be simplified?**

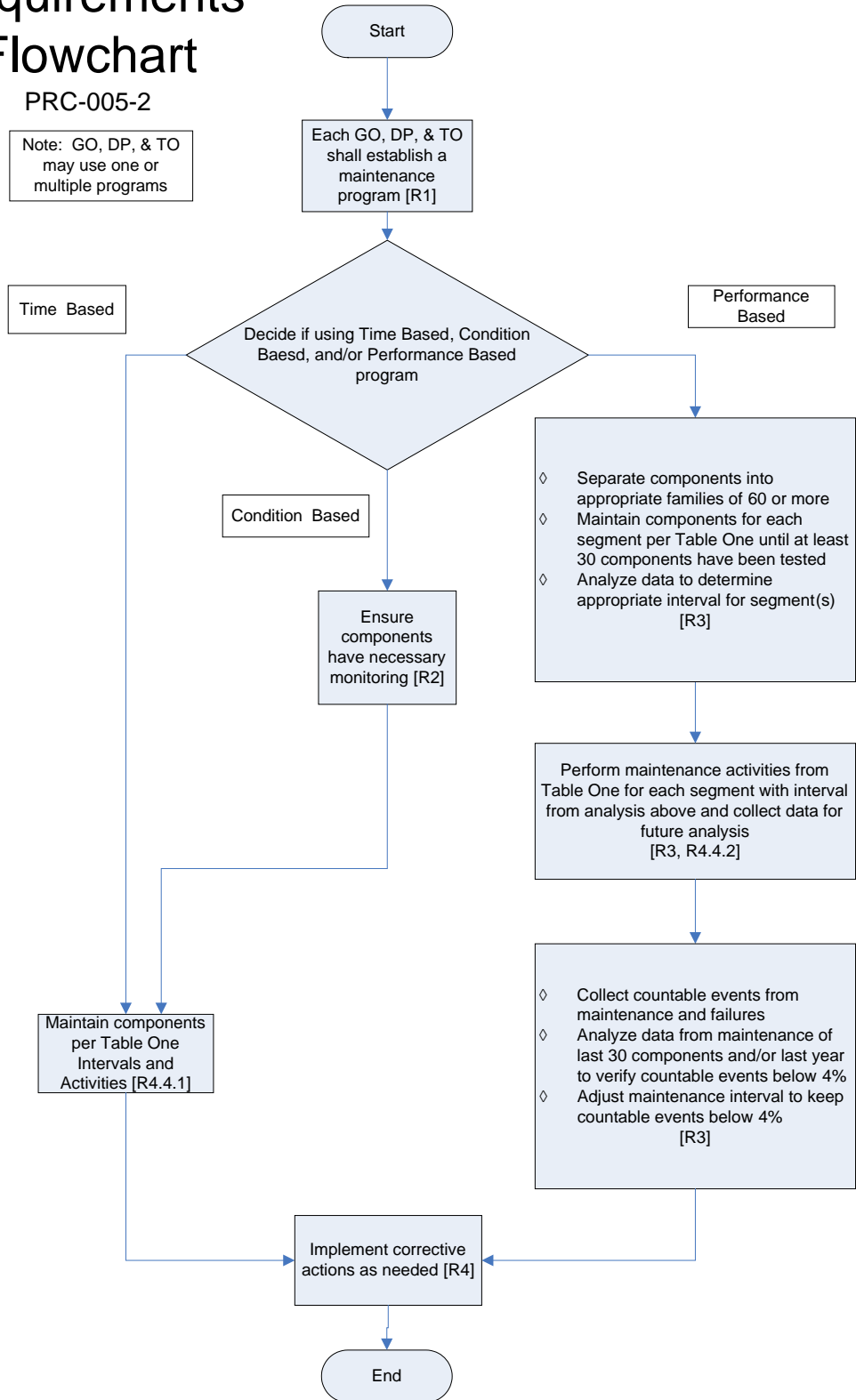
Because the standard is establishing parameters for condition-based Maintenance (R2) and performance-based Maintenance (R3) in addition to simple time-based Maintenance, it does appear to be complicated. At its simplest, an entity needs to and perform ONLY time-based maintenance according to the unmonitored rows of the Tables. If an entity then wishes to take advantage of monitoring on its Protection System components and its available lengthened time intervals then it may, as long as the component has the listed monitoring attributes. If an entity wishes to use historical performance of its Protection System components to perform performance-based Maintenance, then R3 applies.

Please see the following diagram, which provides a “flow chart” of the standard.

Requirements Flowchart

PRC-005-2

Note: GO, DP, & TO may use one or multiple programs



II Group by Type of Protection System Component:

1. All Protection System Components

A. Are power circuit reclosers, reclosing relays, closing circuits and auto-restoration schemes covered in this standard?

No. As stated in Requirement R1, this standard covers protective relays that use measurements of voltage, current and/or phase angle to determine anomalies and to trip a portion of the BES. Reclosers, reclosing relays, closing circuits and auto-restoration schemes are used to cause devices to close as opposed to electrical-measurement relays and their associated circuits that cause circuit interruption from the BES; such closing devices and schemes are more appropriately covered under other NERC Standards. There is one notable exception: if a Special Protection System incorporates automatic closing of breakers, the related closing devices are part of the SPS and must be tested accordingly.

B. Why does PRC-005-2 not specifically require maintenance and testing procedures as reflected in the previous standard, PRC-005-1?

PRC-005-1 does not require detailed maintenance and testing procedures, but instead requires summaries of such procedures, and is not clear on what is actually required. PRC-005-2 requires a documented maintenance program, and is focused on establishing requirements rather than prescribing methodology to meet those requirements. Between the activities identified in the tables 1-1 through 1-5 and Table 2 (collectively the “Tables”), and the various components of the definition established for a “Protection System Maintenance Program”, PRC-005-2 establishes the activities and time-basis for a Protection System Maintenance Program to a level of detail not previously required.

2. Protective Relays

A. How do I approach testing when I have to upgrade firmware of a microprocessor relay?

The entity should ensure that the relay continues to function properly after implementation of firmware changes. Some entities may have a R&D department that might routinely run acceptance tests on devices with firmware upgrades before allowing the upgrade to be installed. Other entities may rely upon the vigorous testing of the firmware OEM. An entity has the latitude to install devices and/or programming that they believe will perform to their satisfaction. If an entity should choose to perform the maintenance activities specified in the Tables following a firmware upgrade then they may, if they choose, reset the time clock on that set of maintenance activities so that they would not have to repeat the maintenance on its regularly scheduled cycle. (However, for simplicity in maintenance schedules, some entities may choose to not reset this time clock; it is merely a suggested option.)

B. Please clarify what is meant by restoration in the definition of maintenance.

The description of “Restoration” in the definition of a Protection System Maintenance Program, addresses corrective activities necessary to assure that the component is returned to working order following the discovery of its failure or malfunction. The Maintenance Activities specified in the Tables do not present any requirements related to Restoration; R4.3 of the standard does require that the entity “initiate any necessary activities to correct unresolved maintenance correctable issues”. Some examples of restoration (or correction of maintenance-correctable issues) include, but are not limited to, replacement of capacitors in distance relays to bring them to working order; replacement of relays, or other Protection System components, to bring the Protection System to working order; upgrade of electro-mechanical or solid-state protective relays to micro-processor based relays following the discovery of failed components. Restoration, as used in this context is not to be confused with Restoration rules as used in system operations. Maintenance activity necessarily includes both the detection of problems and the repairs needed to eliminate those problems. This standard does not identify all of the Protection System problems that must be detected and eliminated, rather it is the intent of this standard that an entity determines the necessary working order for their various devices and keeps them in working order. If an equipment item is repaired or replaced then the entity can restart the maintenance-time-interval-clock if desired, however the replacement of equipment does not remove any documentation requirements that would have been required to verify compliance with time-interval requirements; in other words do not discard maintenance data that goes to verify your work

C. If I upgrade my old relays then do I have to maintain my previous equipment maintenance documentation?

If an equipment item is repaired or replaced then the entity can restart the maintenance-activity-time-interval-clock if desired, however the replacement of equipment does not remove any documentation requirements. The requirements in the standard are intended to ensure that an entity has a maintenance plan and that the entity adheres to minimum activities and maximum time intervals. The documentation requirements are intended to help an entity demonstrate compliance. For example, saving the dates and records of the last two maintenance activities is intended to demonstrate compliance with the interval. Therefore, if you upgrade or replace equipment then you still must maintain the documentation for the previous equipment, thus demonstrating compliance with the time interval requirement prior to the replacement action.

D. What is meant by “Verify that settings are as specified” maintenance activity in Table 1-1?

Verification of settings is an activity directed mostly towards microprocessor based relays.

For relay maintenance departments that choose to test microprocessor based relays in the same manner as electro-mechanical relays are tested, the testing process sometimes requires that some specific functions be disabled. Later tests might enable the functions previously disabled but perhaps still other functions or logic statements were then masked out. It is imperative that, when the relay is placed into service, the settings in the relay be the settings that were intended to be in that relay or as the Standard states “...settings are as specified.”

Many of the microprocessor based relays available today have software tools which provide this functionality and generate reports for this purpose.

For evidence or documentation of this requirement a simple recorded acknowledgement that the settings were checked to be as specified is sufficient.

The drafting team was careful not to require "...that the relay settings be correct..." because it was believed that this might then place a burden of proof that the specified settings would result in the correct intended operation of the interrupting device. While that is a noble intention, the measurable proof of such a requirement is immense. The intent is simply to check that the settings in the relay match the settings specified to those placed into the relay.

E. Are electromechanical relays included in the "Verify that settings are as specified" maintenance activity in Table 1-1?

Verification of settings is an activity directed towards the application of protection related functions of microprocessor based relays. Electromechanical relays require calibration verification by voltage and/or current injection, and thus the settings are verified during calibration activity. In the example of a time-overcurrent relay, a minor deviation in time dial, versus the settings, may be acceptable as long as the relay calibration is within accepted tolerances at the injected current amplitudes. A major deviation may require further investigation, as it could indicate a problem with the relay or an incorrect relay style for the application.

F. I use my protective relays only as sources of metered quantities and breaker status for SCADA and EMS through a substation distributed RTU or data concentrator to the control center. What are the maintenance requirements for the relays?

This standard addresses only devices "that are applied on, or are designed to provide protection for the BES." Protective relays, providing only the functions mentioned in the question, are not included.

G. I use my protective relays for fault and disturbance recording, collecting oscillographic records and event records via communications for fault analysis to meet NERC and DME requirements. What are the maintenance requirements for the relays?

For relays used only as disturbance monitoring equipment, the NERC standard PRC-018-1 R3 & R6 states the maintenance requirements, and is being addressed by a Standards activity that is revising PRC-002-1 and PRC-018-1. For protective relays "that are applied on, or are designed to provide protection for the BES," this standard applies, even if they also perform DME functions.

H. We have a number of installations where we have changed our Protection System components. Some of the changes were upgrades, but others were simply system rating changes that merely required taking relays "out-of-service". What are our responsibilities when it comes to "out-of-service" devices?

Assuming that your system up-rates, upgrades and overall changes meet any and all other requirements and standards then the requirements of PRC-005-2 are simple – if the Protection system component performs a Protection system function then it must be maintained. If the component no longer performs Protection System functions than it does not require maintenance activities under the Tables of PRC-005-2. While many entities might physically remove a component that is no longer needed there is no requirement in PRC-005-2 to remove such component(s). Obviously, prudence would dictate that an "out-of-service" device is truly made inactive. There are no record requirements listed in PRC-005-2 for Protection System components not used.

I. While performing relay testing of a protective device on our Bulk Electric System it was discovered that the protective device being tested was either broken or out of calibration.

Does this satisfy the relay testing requirement even though the protective device tested bad, and may be unable to be placed back into service?

Yes, PRC-005-2 requires entities to perform relay testing on protective devices on a given maintenance cycle interval. By performing this testing, the entity has satisfied PRC-005-2 requirement although the protective device may be unable to be returned to service under normal calibration adjustments. R4.3 states (the entity must):

The entity must assure either that the components are within acceptable parameters at the conclusion of the maintenance activities or initiate any necessary activities to correct unresolved maintenance correctable issues.

J. If I show the protective device out of service while it is being repaired then can I add it back as a new protective device when it returns? If not, my relay testing history would show that I was out of compliance for the last maintenance cycle.

The maintenance and testing requirements (R4.3) (in essence) state that the entity assure the components are within the owner's acceptable operating parameters, if not then actions must be initiated to correct the deviance. The type of corrective activity is not stated; however it could include repairs or replacements. Documentation is always a necessity (*"If it is not documented then it wasn't done!"*)

Your documentation requirements will increase, of course, to demonstrate that your device tested bad and had corrective actions initiated. Your regional entity could very well ask for documentation showing status of your corrective actions.

K. What calibration tolerance should be applied on electromechanical relays?

Each entity establishes their own acceptable tolerances when applying protective relaying on their system. For some Protection System components, adjustment is required to bring measurement accuracy within the parameters established by the asset owner based on the specific application of the component. A calibration failure is the result if testing finds the specified parameters to be out of tolerance.

L. What is meant by "verify operation of the relay inputs and outputs that are essential to proper functioning of the Protection System?"

Any input or output that "affects the tripping" of the breaker is included in the scope of I/O to be verified. By "affects the tripping" one needs to realize that sometimes there are more Inputs and Outputs than simply the output to the trip coil. Many important protective functions include things like Breaker Fail Initiation, Zone Timer Initiation and sometimes even 52a/b contact inputs are needed for a protective relay to correctly operate.

Each input should be "picked up" or "turned on and off" and verified as changing state by the microprocessor of the relay. Each output should be "operated" or "closed and opened" from the microprocessor of the relay and the output should be verified to change state on the output terminals of the relay.

Each input detector on a component that is needed for a protective function and each output action from a component that is needed for a protective function needs to be tested.

In short, if an entity designed a scheme into the protective functions then that scheme needs to be tested.

3. Voltage and Current Sensing Device Inputs to Protective Relays

A. What is meant by “...verify the current and voltage circuit inputs from the voltage and current sensing devices to the protective relays ...” Do we need to perform ratio, polarity and saturation tests every few years?

No. You must verify that the protective relay is receiving the expected values from the voltage and current sensing devices (typically voltage and current transformers). This can be as difficult as is proposed by the question (with additional testing on the cabling and substation wiring to ensure that the values arrive at the relays); or simplicity can be achieved by other verification methods. While some examples follow, these are not intended to represent an all-inclusive list; technology advances and ingenuity should not be excluded from making comparisons and verifications:

- Compare the secondary values, at the relay, to a metering circuit, fed by different current transformers, monitoring the same line as the questioned relay circuit.
- Compare the individual phase secondary values at the relay panel (with additional testing on the panel wiring to ensure that the values arrive at those relays) with the other phases, and verify that residual currents are within expected bounds
- Observe all three phase currents and the residual current at the relay panel with an oscilloscope, observing comparable magnitudes and proper phase relationship, with additional testing on the panel wiring to ensure that the values arrive at the relays.
- Compare the values, as determined by the questioned relay (such as, but not limited to, a query to the microprocessor relay), to another protective relay monitoring the same line, with currents supplied by different CT's.
- Compare the secondary values, at the relay with values measured by test instruments (such as, but not limited to multi-meters, voltmeter, clamp-on ammeters, etc) and verified by calculations and known ratios to be the values expected. For example a single PT on a 100KV bus will have a specific secondary value that when multiplied by the PT ratio arrives at the expected bus value of 100KV.
- Query SCADA for the power flows at the far end of the line protected by the questioned relay, compare those SCADA values to the values as determined by the questioned relay.
- Totalize the Watts and VARs on the bus and compare the totals to the values as seen by the questioned relay.

The point of the verification procedure is to ensure that all of the individual components are functioning properly; and that, an ongoing proactive procedure is in place to re-check the various components of the protective relay measuring systems.

B. The verification of phase current and voltage measurements by comparison to other quantities seems reasonable. How, though, can I verify residual or neutral currents, or 3V0 voltages, by comparison, when my system is closely balanced?

Since these inputs are verified at commissioning, maintenance verification requires ensuring that phase quantities are as expected and that 3IO and 3VO quantities appear equal to or close to 0.

These quantities also may be verified by use of oscillographic records for connected microprocessor relays as recorded during system disturbances. Such records may compare to similar values recorded at other locations by other microprocessor relays for the same event, or compared to expected values (from short circuit studies) for known fault locations.

C. Is wiring insulation or hi-pot testing required by this Maintenance Standard?

No, wiring insulation and equipment hi-pot testing are not specifically required by the Maintenance Standard. However, if the method of verifying CT and PT inputs to the relay involves some other method than actual observation of current and voltage transformer secondary inputs to the relay, it might be necessary to perform some sort of cable integrity test to verify that the instrument transformer secondary signals are actually making it to the relay and not being shunted off to ground. For instance, you could use CT excitation tests and PT turns ratio tests and compare to baseline values to verify that the instrument transformer outputs are acceptable. However, to conclude that these acceptable transformer instrument output signals are actually making it to the relay inputs, it also would be necessary to verify the insulation of the wiring between the instrument transformer and the relay.

D. My plant generator and transformer relays are electromechanical and do not have metering functions as do microprocessor based relays. In order for me to compare the instrument transformer inputs to these relays to the secondary values of other metered instrument transformers monitoring the same primary voltage and current signals, it would be necessary to temporarily connect test equipment like voltmeters and clamp on ammeters to measure the input signals to the relays. This practice seems very risky and a plant trip could result if the technician were to make an error while measuring these current and voltage signals. How can I avoid this risk? Also, what if no other instrument transformers are available which monitor the same primary voltage or current signal?

Comparing the input signals to the relays to the outputs of other independent instrument transformers monitoring the same primary current or voltage is just one method of verifying the instrument transformer inputs to the relays but is not required by the standard. Plants can choose how to best manage their risk. If online testing is deemed too risky, offline tests such as, but not limited to, CT excitation test and PT turns ratio tests can be compared to baseline data and be used in conjunction with CT and PT secondary wiring insulation verification tests to adequately “verify the current and voltage circuit inputs from the voltage and current sensing devices to the protective relays ...” while eliminating the risk of tripping an in service generator or transformer. Similarly, this same offline test methodology can be used to verify the relay input voltage and current signals to relays when there are no other instrument transformers monitoring available for purposes of signal comparison.

4. Protection System Control Circuitry

A. Is it permissible to verify circuit breaker tripping at a different time (and interval) than when we verify the protective relays and the instrument transformers?

Yes, provided the entire Protective System is tested within the individual components' maximum allowable testing intervals.

B. The Protection System Maintenance Standard describes requirements for verifying the tripping of circuit breakers. What is this telling me about maintenance of circuit breakers?

Requirements in PRC-005-2 are intended to verify the integrity of tripping circuits, including the breaker trip coil, as well as the presence of auxiliary supply (usually a battery) for energizing the trip coil if a protection function operates. Beyond this, PRC-005-2 sets no requirements for verifying circuit breaker performance, or for maintenance of the circuit breaker.

C. How do I test each dc Control Circuit path, as established in Table 1-5 “Protection System Control Circuitry (Trip coils and auxiliary relays)”?

Table 1-5 specifies that each breaker trip coil, auxiliary relay, and lockout relay must be operated within the specified time period. The required operations may be via targeted maintenance activities, or by documented operation of these devices for other purposes such as fault clearing.

D. What does this standard require for testing an Auxiliary Tripping Relay?

Table 1 requires that the trip test must verify that the auxiliary tripping relay(s) and/or lockout relay(s) operate(s) electrically and that their trip output(s) perform as expected. Auxiliary outputs not in a trip path (i.e. annunciation or DME input) are not required, by this standard, to be checked.

E. What does a functional (or operational) trip test include?

An operational trip test must be performed on a trip device. Each control circuit path that produces a trip signal must be verified; this includes trip coils, auxiliary tripping relays, lockout relays, and communications-assisted-trip schemes.

A trip test may be an overall test that verifies the operation of the entire trip scheme at once, or it may be several tests of the various portions that make up the entire trip path, provided that testing of the various portions of the trip scheme verifies all of the portions, including parallel paths, and overlaps those portions.

A circuit breaker or other interrupting device needs to be trip tested at least once per trip coil.

Discrete-component auxiliary relays and lock-out relays must be verified by trip test. The trip test must verify that the auxiliary or lock-out relay operates electrically and that the relay's trip output(s) change(s) state. Software latches or control algorithms, including trip logic processing implemented as programming component such as a microprocessor relay that take the place of (conventional) discrete component auxiliary relays or lock-out relays do not have to be routinely trip tested.

Normally-closed auxiliary contacts from other devices (for example, switchyard-voltage-level disconnect switches, interlock switches, or pressure switches) which are in the breaker trip path do not need to be tested.

F. Is a Sudden Pressure Relay an Auxiliary Tripping Relay?

No. IEEE C37.2-2008 assigns the device number 94 to auxiliary tripping relays. Sudden pressure relays are assigned device number 63, and is excluded from the Standard because it does not utilize voltage and/or current measurements to determine anomalies. Devices that use anything other than electrical detection means are excluded.

G. The standard specifically mentions Auxiliary and Lock-out relays; what is an Auxiliary Tripping Relay?

An auxiliary relay, IEEE Device Number 94, is described in IEEE Standard C37.2-2008 as “A device that functions to trip a circuit breaker, contactor, or equipment; to permit immediate tripping by other devices; or to prevent immediate reclosing of a circuit interrupter if it should open automatically, even though its closing circuit is maintained closed.”

H. What is a Lock-out Relay?

A lock-out relay, IEEE Device Number 86, is described in IEEE Standard C37.2 as “A device that trips and maintains the associated equipment or devices inoperative until it is reset by an operator, either locally or remotely.”

I. My mechanical device does not operate electrically and does not have calibration settings; what maintenance activities apply?

You must conduct a test(s) to verify the integrity of the trip circuit. This standard does not cover circuit breaker maintenance or transformer maintenance. The standard also does not cover testing of devices such as sudden pressure relays (63), temperature relays (49), and other relays which respond to mechanical parameters rather than electrical parameters.

5. Station dc Supply

A. What constitutes the station dc supply as mentioned in the definition of Protective System?

The station direct current (dc) supply normally consists of two components: the battery charger and the station battery itself. There are also emerging technologies that provide a source of dc supply that does not include either a battery or charger.

Battery Charger - The battery charger is supplied by an available ac source. At a minimum, the battery charger must be sized to charge the battery (after discharge) and supply the constant dc load. In many cases, it may be sized also to provide sufficient dc current to handle the higher energy requirements of tripping breakers and switches when actuated by the protective relays in the Protection System.

Station Battery - Station batteries provide the dc power required for tripping and for supplying normal dc power to the station in the event of loss of the battery charger. There are several technologies of battery that require unique forms of maintenance as established in Table 1.

Emerging Technologies - Station dc supplies are currently being developed that use other energy storage technologies beside the station battery to prevent loss of the station dc supply when ac power is lost. Maintenance of these station dc supplies will require different kinds of tests and inspections. Table 1 presents maintenance activities and maximum allowable testing

intervals for these new station dc supply technologies. However, because these technologies are relatively new the maintenance activities for these station dc supplies may change over time.

B. In the Maintenance Activities for station dc supply in Table 1, what do you mean by “continuity”?

Because the Standard pertains to maintenance not only of the station battery, but also the whole station dc supply, continuity checks of the station dc supply are required. “Continuity” as used in Table 1 refers to verifying that there is a continuous current path from the positive terminal of the station battery set to the negative terminal, otherwise there is no way of determining that a station battery is available to supply dc current to the station.

The current path through a station battery from its positive to its negative connection to the dc control circuits is composed of two types of elements. These path elements are the electrochemical path through each of its cells and all of the internal and external metallic connections and terminations of the batteries in the battery set. If there is loss of continuity (an open circuit) in any part of the electrochemical or metallic path the battery set will not be available for service.

C. Why is it necessary to verify the continuity of the dc supply?

In the event of the loss of the ac source or battery charger, the battery must be capable of supplying dc current, both for continuous dc loads and for tripping breakers and switches. Without continuity, the battery cannot perform this function.

If the battery charger is not sized to handle the maximum dc current required to operate the protective systems, it is sized only to handle the constant dc load of the station and the charging current required to bring the battery back to full charge following a discharge. At those stations, the battery charger would not be able to trip breakers and switches if the battery experiences loss of continuity.

At generating stations and large transmission stations where battery chargers are capable of handling the maximum current required by the Protection System, there are still problems that could potentially occur when the continuity through the connected battery is interrupted.

- ◇ Many battery chargers produce harmonics which can cause failure of dc power supplies in microprocessor based protective relays and other electronic devices connected to station dc supply. In these cases, the substation battery serves as a filter for these harmonics. With the loss of continuity in the battery, the filter provided by the battery is no longer present.
- ◇ Loss of electrical continuity of the station battery will cause, regardless of the battery charger’s output current capability, a delayed response in full output current from the charger. Almost all chargers have an intentional 1 to 2 second delay to switch from a low substation dc load current to the maximum output of the charger. This delay would cause the opening of circuit breakers to be delayed which could violate system performance standards.

D. How do you verify continuity of the dc supply?

Monitoring of the station dc supply voltage will not indicate that there is a problem with the dc current path through the battery unless the battery charger is taken out of service. At that time

a break in the continuity of the station battery current path will be revealed because there will be no voltage on the station dc circuitry.

Although the Standard prescribes what must be done during the maintenance activity it does not prescribe how the maintenance activity should be accomplished. There are several methods that can be used to verify the electrical continuity of the battery. These are not the only possible methods, simply a sampling of some methods:

- ◇ One method is to measure that there is current flowing through the battery itself by a simple clamp on milliamp-range ammeter. A battery is always either charging or discharging. Even when a battery is charged there is still a measurable float charge current that can be detected to verify that there is continuity in the electrical path through the battery.
- ◇ A simple test for continuity is to remove the battery charger from service and verify that the battery provides voltage and current to the dc system. However, the behavior of the various dc-supplied equipment in the station should be considered before using this approach.
- ◇ Manufacturers of microprocessor controlled battery chargers have developed methods for their equipment to periodically (or continuously) test for battery continuity. For example, one manufacturer periodically reduces the float voltage on the battery until current from the battery to the dc load can be measured to confirm continuity.
- ◇ Applying test current (as in an ohmic testing device) will provide a current that when measured elsewhere in the string, will prove that the circuit is continuous.

No matter how the electrical continuity of a battery set is verified it is a necessary maintenance activity that must be performed at the intervals prescribed by Table 1 to insure that the station dc supply has a path that can provide the required current to the Protection System at all times.

E. When should I check the station batteries to see if they have sufficient energy to perform as designed?

The answer to this question depends on the type of battery (valve regulated lead-acid, vented lead acid, or nickel-cadmium), the maintenance activity chosen, and the type of time based monitoring level selected.

For example, if you have a Valve Regulated Lead-Acid (VRLA) station battery, and you have chosen to evaluate the measured cell/unit internal ohmic values to the battery cell's baseline, you will have to perform verification at a maximum maintenance interval of no greater than every three months. While this interval might seem to be quite short, keep in mind that the 3 month interval is consistent with IEEE guidelines for VRLA batteries; this interval provides an accumulation of data that better shows when a VRLA battery is no longer capable of its design capacity.

If, for a VRLA station battery, you choose to conduct a performance capacity test on the entire station battery as the maintenance activity, then you will have to perform verification at a maximum maintenance interval of no greater than every 3 calendar years.

F. Why in Table 1 are there two Maintenance Activities with different Maximum Maintenance Intervals listed to verify that the station battery can perform as designed?

The two acceptable methods for proving that a station battery can perform as designed are based on two different philosophies. The first activity requires a capacity discharge test of the entire battery set to verify that degradation of one or several components (cells) in the set has not deteriorated to a point where the total capacity of the battery system falls below its designed rating. The second maintenance activity requires tests and evaluation of the internal ohmic measurements on each of the individual cells/units of the battery set to determine that each component can perform as designed and therefore the entire battery set can be verified to perform as designed.

The maximum maintenance interval for discharge capacity testing is longer than the interval for testing and evaluation of internal ohmic cell measurements. An individual component of a battery set may degrade to an unacceptable level without causing the total battery set to fall below its designed rating under capacity testing. However, since the philosophy behind internal ohmic measurement evaluation is based on the fact that each battery component must be verified to be able to perform as designed, the interval for verification by this maintenance activity must be shorter to catch individual cell/unit degradation. It should be noted that even if a battery unit is composed of multiple cells the ohmic test can still be accomplished. The data produced becomes trending data on the multi-cell unit instead of trending individual cells.

G. What is the justification for having two different Maintenance Activities listed in Table 1 to verify that the station battery can perform as designed?

IEEE Standards 450, 1188, and 1106 for vented lead-acid, valve-regulated lead-acid (VRLA), and nickel-cadmium batteries, respectively (which together are the most commonly used substation batteries on the BES) go into great detail about capacity testing of the entire battery set to determine that a battery can perform as designed.

The first maintenance activity listed in Table 1 for verifying that a station battery can perform as designed uses maximum maintenance intervals for capacity testing that were designed to align with the IEEE battery standards. This maintenance activity is applicable for vented lead-acid, valve-regulated lead-acid, and nickel-cadmium batteries.

The second maintenance activity listed in Table 1 for verifying that a station battery can perform as designed uses maximum maintenance intervals for evaluating internal ohmic measurements in relation to their baseline measurements that are based on industry experience, EPRI technical reports and application guides, and the IEEE battery standards. By evaluating the internal ohmic measurements for each cell and comparing that measurement to the cell's baseline ohmic measurement (taken at the time of the battery set's acceptance capacity test), low-capacity cells can be identified and eliminated to keep the battery set capable of performing as designed. This maintenance activity is applicable only for vented lead-acid and VRLA batteries; this trending activity has not shown to be effective for NiCd batteries thus the only choices for NiCd batteries are the performance tests (see applicable IEEE guideline for specifics on performance tests). It should be noted that even if a battery unit is composed of multiple cells the ohmic test can still be accomplished. The data produced becomes trending data on the multi-cell unit instead of trending individual cells.

H. Why in Table 1 of PRC-005-2 is there a maintenance activity to inspect the structural integrity of the battery rack?

The three IEEE standards (1188, 450, and 1106) for VRLA, vented lead-acid, and nickel-cadmium batteries all recommend that as part of any battery inspection the battery rack should be inspected. The purpose of this inspection is to verify that the battery rack is correctly installed and has no deterioration that could weaken its structural integrity. Because the battery rack is specifically designed for the battery that is mounted on it, weakening of its structural members by rust or corrosion can physically jeopardize the battery.

I. What is required to comply with the “Unintentional Grounds” requirement?

In most cases, the first ground that appears on a battery is not a problem. It is the unintentional ground that appears on the opposite pole that becomes problematic. Even then many systems are designed to operate favorably under some unintentional DC ground situations. It is up to the owner of the Protection System to determine if corrective actions are needed on detected unintentional DC grounds. The standard merely requires that a check be made for the existence of Unintentional DC Grounds. Obviously a “check-off” of some sort will have to be devised by the inspecting entity to document that a check is routinely done for Unintentional DC Grounds.

J. Where the standard refers to “all cells” is it sufficient to have a documentation method that refers to “all cells” or do we need to have separate documentation for every cell? For example to I need 60 individual documented check-offs for good electrolyte level or would a single check-off per bank be sufficient?

A single check-off per battery bank is sufficient for documentation, as long as the single check-off attests to checking all cells/units.

K. Does this standard refer to Station batteries or all batteries, for example Communications Site Batteries?

This standard refers to Station Batteries. The drafting team does not believe that the scope of this standard refers to communications sites. The batteries covered under PRC-005-2 are the batteries that supply the trip current to the trip coils of the interrupting devices that are a part of the Protection System. The SDT believes that a loss of power to the communications systems at a remote site would cause the communications systems associated with protective relays to alarm at the substation. At this point the corrective actions can be initiated.

L. My VRLA batteries have multiple-cells within an individual battery jar (or unit); how am I expected to comply with the cell-to-cell ohmic measurement requirements on these units that I cannot get to?

The values that are measured at all available terminals will produce results that can be tracked. Thus the trended results become the results of a unit instead of an individual cell. Bad units (regardless of the number of cells per unit) will result in the eventual repair or replacement of multiple cells even if only a single cell actually went bad. Cell-to-cell tests can equate to unit-to-unit tests or jar-to-jar tests. If there is such a thing as a single unit that contains the entire battery for the facility but only brings out the positive and negative posts (as in a car battery) then the testing across these only two available posts will produce usable trending test data.

6. Protection System Communications Equipment

A. What are some examples of mechanisms to check communications equipment functioning?

For unmonitored Protection Systems, various types of communications systems will have different facilities for on-site integrity checking to be performed at least every three months during a substation visit. Some examples are, but not limited to:

- ◇ On-off power-line carrier systems can be checked by performing a manual carrier keying test between the line terminals, or carrier check-back test from one terminal.
- ◇ Systems which use frequency-shift communications with a continuous guard signal (over a telephone circuit, analog microwave system, etc.) can be checked by observing for a loss-of-guard indication or alarm. For frequency-shift power-line carrier systems, the guard signal level meter can also be checked.
- ◇ Hard-wired pilot wire line Protection Systems typically have pilot-wire monitoring relays that give an alarm indication for a pilot wire ground or open pilot wire circuit loop.
- ◇ Digital communications systems typically have a data reception indicator or data error indicator (based on loss of signal, bit error rate, or frame error checking).

For monitored Protection Systems, various types of communications systems will have different facilities for monitoring the presence of the communications channel, and activating alarms that can be monitored remotely. Some examples are, but not limited to:

- ◇ On-off power-line carrier systems can be shown to be operational by automated periodic power-line carrier check-back tests, with remote alarming of failures.
- ◇ Systems which use a frequency-shift communications with a continuous guard signal (over a telephone circuit, analog microwave system, etc.) can be remotely monitored with a loss-of-guard alarm or low signal level alarm.
- ◇ Hard-wired pilot wire line Protection Systems can be monitored by remote alarming of pilot-wire monitoring relays.
- ◇ Digital communications systems can activate remotely monitored alarms for data reception loss or data error indications.
- ◇ Systems can be queried for the data error rates.

For the highest degree of monitoring of Protection Systems, the communications system must monitor all aspects of the performance and quality of the channel that show it meets the design performance criteria, including monitoring of the channel interface to protective relays.

- ◇ In many communications systems signal quality measurements including signal-to-noise ratio, received signal level, reflected transmitter power or standing wave ratio, propagation delay, and data error rates are compared to alarm limits. These alarms are connected for remote monitoring.
- ◇ Alarms for inadequate performance are remotely monitored at all times, and the alarm communications system to the remote monitoring site must itself be continuously monitored to assure that the actual alarm status at the communications equipment location is continuously being reflected at the remote monitoring site.

B. What is needed for the 3-month inspection of communications-assisted trip scheme equipment?

The 3-month inspection applies to unmonitored equipment. An example of compliance with this requirement might be, but is not limited to:

With each site visit, check that the equipment is free from alarms, check any metered signal levels, and that power is still applied. While this might be explicit for a particular type of equipment (i.e., FSK equipment), the concept should be that the entity verify that the communications equipment that is used in a Protection System is operable through a cursory inspection and site visit. This site visit can be eliminated on this particular example if the FSK equipment had a monitored alarm on Loss of Guard.

C. Does a fiber optic I/O scheme used for breaker tripping or control within a station, for example - transmitting a trip signal or control logic between the control house and the breaker control cabinet, constitute a communications system?

This equipment is presently classified as being part of the Protection System Control Circuitry and tested per the portions of Table 1 applicable to Protection System Control Circuitry rather than those portions of the table applicable to communications equipment.

D. In Table 1-2, the Maintenance Activities section of the Protective System Communications Equipment and Channels refers to the quality of the channel meeting “performance criteria”. What is meant by performance criteria?

Protection System communications channels must have a means of determining if the channel and communications equipment is operating normally. If the channel is not operating normally an alarm will be indicated. For unmonitored systems this alarm will probably be on the panel. For monitored systems, the alarm will be transmitted to a remote location.

Each entity will have established a nominal performance level for each protective system communications channel that is consistent with proper functioning of the Protection System. If that level of nominal performance is not being met, the system will go into alarm. Following are some examples of protective system communications channel performance measuring:

- ◇ For direct transfer trip using a frequency shift power line carrier channel, a guard level monitor is part of the equipment. A normal receive level is established when the system is calibrated and if the signal level drops below an established level, the system will indicate an alarm.
- ◇ An on-off blocking signal over power line carrier is used for directional comparison blocking schemes on transmission lines. During a fault, block logic is sent to the remote relays by turning on a local transmitter and sending the signal over the power line to a receiver at the remote end. This signal is normally off so continuous levels cannot be checked. These schemes use check-back testing to determine channel performance. A predetermined signal sequence is sent to the remote end and the remote end decodes this signal and sends a signal sequence back. If the sending end receives the correct information from the remote terminal, the test passes and no alarm is indicated. Full power and reduced power tests are typically run. Power levels for these tests are determined at the time of calibration.
- ◇ Pilot wire relay systems use a hardwire communications circuit to communicate between the local and remote ends of the protective zone. This circuit is monitored by circulating a dc current between the relay systems. A typical level may be 1 mA. If the level drops below the setting of the alarm monitor, the system will indicate an alarm.

- ◇ Modern digital relay systems use data communications to transmit relay information to the remote end relays. An example of this is a line current differential scheme commonly used on transmission lines. The protective relays communicate current magnitude and phase information over the communications path to determine if the fault is located in the protective zone. Quantities such as digital packet loss, bit error rate and channel delay are monitored to determine the quality of the channel. These limits are determined and set during relay commissioning. Once set, any channel quality problems that fall outside the set levels will indicate an alarm.

The previous examples show how some protective relay communications channels can be monitored and how the channel performance can be compared to performance criteria established by the entity. This standard does not state what the performance criteria will be - it just requires that the entity establish nominal criteria so protective system channel monitoring can be performed.

7. UVLS and UFLS Relays that Comprise a Protection System Distributed Over the Power System

- A. We have an Under Voltage Load Shedding (UVLS) system in place that prevents one of our distribution substations from supplying extremely low voltage in the case of a specific transmission line outage. The transmission line is part of the BES. Does this mean that our UVLS system falls within this standard?**

The situation as stated indicates that the tripping action was intended to prevent low distribution voltage to a specific load from a transmission system that was intact except for the line that was out of service, as opposed to preventing cascading outage or transmission system collapse.

This Standard is not applicable to this UVLS.

- B. We have a UFLS scheme that sheds the necessary load through distribution-side circuit breakers and circuit reclosers. Do the trip-test requirements for circuit breakers apply to our situation?**

No. Distributed tripping schemes would have to exhibit multiple failures to trip before they would prove to be significant as opposed to a single failure to trip of, for example, a Transmission Protection System Bus Differential Lock-Out Relay. While many failures of these distribution breakers could add up to be significant, it is also believed that distribution breakers are operated often on just fault clearing duty and therefore the distribution circuit breakers are operated at least as frequently as any requirements that might have appeared in this standard.

- C. What does “distributed over the power system” mean?**

This refers to the common practice of applying UFLS on the distribution system, with each UFLS individually tripping a relatively low value of load. Therefore, the program is implemented via a large number of individual UFLS components performing independently, and the failure of any individual component to perform properly will have a minimal impact on the effectiveness of the overall UFLS program. Some UVLS systems are applied similarly.

8. SPS or Relay Sensing for Centralized UFLS or UVLS

A. Do I have to perform a full end-to-end test of a Special Protection System?

No. All portions of the SPS need to be maintained, and the portions must overlap, but the overall SPS does not need to have a single end-to-end test.

B. What about SPS interfaces between different entities or owners?

All SPS owners should have maintenance agreements that state which owner will perform specific tasks. As in all of the Protection System requirements, SPS segments can be tested individually thus minimizing the need to accommodate complex maintenance schedules.

C. What do I have to do if I am using a phasor measurement unit (PMU) as part of a Protection System or Special Protection System?

Any Phasor Measurement Unit (PMU) function whose output is used in a Protection System or Special Protection System (as opposed to a monitoring task) must be verified as a component in a Protection System.

D. How do I maintain a Special Protection System or Relay Sensing for Centralized UFLS or UVLS Systems?

Since components of the SPS, UFLS, or UVLS are the same types of components as those in Protection Systems then these components should be maintained like similar components used for other Protection System functions. In many cases the devices for SPS, UFLS and UVLS are also used for other protective functions. The same maintenance activities apply with the exception that distributed systems (UFLS and UVLS) have fewer dc supply and control circuitry maintenance activity requirements.

For the testing of the output action, verification may be by breaker tripping, but may be verified in overlapping segments. For example an SPS that trips a remote circuit breaker might be tested by testing the various parts of the scheme in overlapping segments. Another method is to document the real-time tripping of an SPS scheme should that occur. Forced trip tests of circuit breakers (etc) that are a part of distributed UFLS or UVLS schemes are not required

E. What does “centralized” mean?

This refers to the practice of applying sensing units at many locations over the system, with all these components providing intelligence to an analytical system which then directs action to address a detected condition. In some cases, this action may not take place at the same location as the sensing units. This approach is often applied for complex SPS, and may be used for UVLS (and perhaps even with UFLS) where necessary to address the conditions of concern.

III Group by Type of BES Facility:

1. All BES Facilities

A. What, exactly, is the BES, or Bulk Electric System?

BES is the abbreviation for Bulk Electric System. BES is a term in the Glossary of Terms Used in Reliability Standards, and is not being modified within this draft Standard.

NERC's approved definition of Bulk Electric System is:

As defined by the Regional Reliability Organization, the electrical generation resources, transmission lines, interconnections with neighboring systems, and associated equipment, generally operated at voltages of 100 kV or higher. Radial transmission facilities serving only load with one transmission source are generally not included in this definition.

Each Regional Entity implements a definition of the Bulk Electric System that is based on this NERC definition, in some cases, supplemented by additional criteria. These regional definitions have been documented and provided to FERC as part of a [June 16, 2007 Informational Filing](#).

2. Generation

A. **Please provide a sample list of devices or systems that must be verified in a generator, generator step-up transformer, and generator connected station auxiliary transformer to meet the requirements of this Maintenance Standard.**

Examples of typical devices and systems that may directly trip the generator, or trip through a lockout relay may include but are not necessarily limited to:

- Fault protective functions, including distance functions, voltage-restrained overcurrent functions, or voltage-controlled overcurrent functions
- Loss-of-field relays
- Volts-per-hertz relays
- Negative sequence overcurrent relays
- Over voltage and under voltage protection relays
- Stator-ground relays
- Communications-based protection systems such as transfer-trip systems
- Generator differential relays
- Reverse power relays
- Frequency relays
- Out-of-step relays
- Inadvertent energization protection
- Breaker failure protection

For generator step up or generator-connected station auxiliary transformers, operation of any the following associated protective relays frequently would result in a trip of the generating unit and, as such, would be included in the program:

- Transformer differential relays
- Neutral overcurrent relay
- Phase overcurrent relays

A loss of a system-connected station auxiliary transformer could result in a loss of the generating plant if the plant was being provided with auxiliary power from that source, and this auxiliary transformer may directly affect the ability to start up the plant and to connect the plant

to the system. Thus, operation of any of the following relays associated with system-connected station auxiliary transformers would be included in the program:

- Transformer differential relays
- Neutral overcurrent relay
- Phase overcurrent relays

Relays which trip breakers serving station auxiliary loads such as pumps, fans, or fuel handling equipment, etc., need not be included in the program even if the loss of the those loads could result in a trip of the generating unit. Furthermore, relays which provide protection to secondary unit substation (SUS) or low switchgear transformers and relays protecting other downstream plant electrical distribution system components are not included in the scope of this program even if a trip of these devices might eventually result in a trip of the generating unit. For example, a thermal overcurrent trip on the motor of a coal-conveyor belt could eventually lead to the tripping of the generator, but it does not cause the trip.

3. Transmission

- A. Why is Distribution Provider included within the Applicable Entities and as a responsible entity within several of the requirements? Wouldn't anyone having relevant facilities be a Transmission Owner?**

Depending on the station configuration of a particular substation, there may be Protection System equipment installed at a non-transmission voltage level (Distribution Provider equipment) that is wholly or partially installed to protect the BES. PRC-005-2 would apply to this equipment. An example is underfrequency load-shedding, which is frequently applied well down into the distribution system to meet PRC-007-0.

IV Group by Type of Maintenance Program:

1. All Protection System Maintenance Programs

- A. I can't figure out how to demonstrate compliance with the requirements for the highest level of monitoring of Protection Systems. Why does this Maintenance Standard describe a maintenance program approach I cannot achieve?**

Demonstrating compliance with the requirements for the highest level of monitoring any particular component of Protection Systems is likely to be very involved, and may include detailed manufacturer documentation of complete internal monitoring within a device, comprehensive design drawing reviews, and other detailed documentation. This Standard does not presume to specify what documentation must be developed; only that it must be documented.

There may actually be some equipment available that is capable of meeting these highest levels of monitoring criteria, in which case it may be maintained according to the highest level of monitoring shown on the Tables. However, even if there is no equipment available today that can meet this level of monitoring; the Standard establishes the necessary requirements for when such equipment becomes available.

By creating a roadmap for development, this provision makes the Standard technology-neutral. The standard drafting team wants to avoid the need to revise the Standard in a few years to accommodate technology advances that are certainly coming to the industry.

B. What forms of evidence are acceptable?

Acceptable forms of evidence, as relevant for the Requirement being documented, include but are not limited to:

- Process documents or plans
- Data (such as relay settings sheets, photos, SCADA, and test records)
- Database lists, records and/or screen shots that demonstrate compliance information
- Prints, diagrams and/or schematics
- Maintenance records
- Logs (operator, substation, and other types of log)
- Inspection forms
- Mail, memos, or email proving the required information was exchanged, coordinated, submitted or received
- Check-off forms (paper or electronic)
- Any record that demonstrates that the maintenance activity was known, accounted for, and/or performed.

C. If I replace a failed Protection System component with another component, what testing do I need to perform on the new component?

The replacement component must be tested to a degree that assures that it will perform as intended. If it is desired to reset the Table 1 maintenance interval for the replacement component, all relevant Table 1 activities for the component should be performed.

D. Please use a specific example to demonstrate the data retention requirements.

The data retention requirements are intended to allow the availability of maintenance records to demonstrate that the time intervals in your maintenance plan were upheld. For example: “Company A” has a maintenance plan that requires its electro-mechanical protective relays be tested, for routine scheduled tests, every 3 calendar years with a maximum allowed grace period of an additional 18 months. This entity would be required to maintain its records of maintenance of its last two routine scheduled tests. Thus its test records would have a latest routine test as well as its previous routine test. The interval between tests is therefore provable to an auditor as being within “Company A’s” stated maximum time interval of 4.5 years.

The intent is not to require three test results proving two time intervals, but rather have two test results proving the last interval. The drafting team contends that this minimizes storage requirements while still having minimum data available to demonstrate compliance with time intervals.

Realistically, the Standard is providing advanced notice of audit team documentation requests; this type of information has already been requested by auditors.

If an entity prefers to utilize Performance Based Maintenance then statistical data may well be retained for extended periods to assist with future adjustments in time intervals.

2. Time-Based Protection System Maintenance (TBM) Programs

A. What does this Maintenance Standard say about commissioning? Is it necessary to have documentation in your maintenance history of the completion of commission testing?

This standard does not establish requirements for commission testing. Commission testing includes all testing activities necessary to conclude that a facility has been built in accordance with design. While a thorough commission testing program would include, either directly or indirectly, the verification of all those Protection System attributes addressed by the maintenance activities specified in the Tables of PRC-005-2, verification of the adequacy of initial installation necessitates the performance of testing and inspections that go well beyond these routine maintenance activities. For example, commission testing might set baselines for future tests; perform acceptance tests and/or warranty tests; utilize testing methods that are not generally done routinely like staged-fault-tests.

However, many of the Protection System attributes which are verified during commission testing are not subject to age related or service related degradation and need not be re-verified within an ongoing maintenance program. Example – it is not necessary to re-verify correct terminal strip wiring on an ongoing basis.

PRC-005-2 assumes that thorough commission testing was performed prior to a protection system being placed in service. PRC-005-2 requires performance of maintenance activities that are deemed necessary to detect and correct plausible age and service related degradation of components such that a properly built and commission tested Protection System will continue to function as designed over its service life.

It should be noted that commission testing frequently is performed by a different organization than that which is responsible for the ongoing maintenance of the Protection System. Furthermore, the commission testing activities will not necessarily correlate directly with the maintenance activities required by the standard. As such, it is very likely that commission testing records will deviate significantly from maintenance records in both form and content and therefore, it is not necessary to maintain commission testing records within the maintenance program documentation.

Notwithstanding the differences in records, an entity would be wise to retain commissioning records to show a maintenance start date. (See next FAQ).

B. How do you determine the initial due date for maintenance?

The initial due date for maintenance should be based upon when a facility and its associated Protection System were placed in service. Alternatively, an entity may choose to use the date of completion of the commission testing of the Protection System component as the starting point in determining its first maintenance due dates. Whichever method is chosen, for newly installed Protection Systems the maintenance program should clearly identify when maintenance is first due.

It is conceivable that there can be a (substantial) difference in time between the date of testing as compared to the date placed into service. The use of the “Calendar Year” language can help determine the next due date without too much concern about being non-compliant for missing test dates by a small amount (provided your dates are not already at the end of a year).

However, if there is a substantial amount of time difference between testing and in-service dates then the testing date should be followed because it is the degradation of components that is the concern. While accuracy fluctuations may decrease when components are not energized

there are cases when degradation can take place even though the device is not energized. Minimizing the time between commissioning tests and in-service dates will help.

- C. The established maximum allowable intervals do not align well with the scheduled outages for my power plant. Can I extend the maintenance to the next scheduled outage following the established maximum interval?**

No. You must complete your maintenance within the established maximum allowable intervals in order to be compliant. You will need to schedule your maintenance during available outages to complete your maintenance as required, even if it means that you may do protective relay maintenance more frequently than the maximum allowable intervals. The maintenance intervals were selected with typical plant outages, among other things, in mind.

- D. If I am unable to complete the maintenance as required due to a major natural disaster (hurricane, earthquake, etc), how will this affect my compliance with this standard.**

The Sanction Guidelines of the North American Electric Reliability Corporation effective January 15, 2008 provides that the Compliance Monitor will consider extenuating circumstances when considering any sanctions.

- E. What if my observed testing results show a high incidence of out-of-tolerance relays, or, even worse, I am experiencing numerous relay misoperations due to the relays being out-of-tolerance?**

The established maximum time intervals are mandatory only as a not-to-exceed limitation. The establishment of a maximum is measurable. But, any entity can choose to test some or all of their Protection System components more frequently (or, to express it differently, exceed the minimum requirements of the Standard). Particularly, if you find that the maximum intervals in the Standard do not achieve your expected level of performance, it is understandable that you would maintain the related equipment more frequently. A high incidence of relay Misoperations is in no one's best interest. The BES and an entity's bottom line both suffer.

- F. We believe that the 3-month interval between inspections is unnecessary, why can we not perform these inspections twice per year?**

The standard drafting team believes that routine monthly inspections are the norm. To align routine station inspections with other important inspections the 3-month interval was chosen. In lieu of station visits many activities can be accomplished with automated monitoring and alarming.

- G. Our maintenance plan calls for us to perform routine protective relay tests every 3 years; if we are unable to achieve this schedule but we are able to complete the procedures in less than the Maximum Time Interval then are we in or out of compliance?**

You are out of compliance. You must maintain your equipment to your stated intervals within your maintenance plan. The protective relays (and any Protection System component) cannot be tested at intervals that are longer than the maximum allowable interval stated in the Tables and yet you must conform to your own maintenance plan. Therefore you should design your maintenance plan such that it is not in conflict with the Minimum Activities and the Maximum Intervals. You then must maintain your equipment according to your maintenance plan. You will end up being compliant with both the standard and your own plan.

- H. How do I achieve a "grace period" without being out of compliance?**

For the purposes of this example, concentrating on just unmonitored protective relays, because there are more relays out there than anything else – Table 1-1 specifies a maximum time interval (between the mandated maintenance activities) of 6 calendar years. Your plan must ensure that your unmonitored relays are tested at least once every 6 calendar years. You could, within your PSMP, require that your unmonitored relays be tested every 4 calendar years with a maximum allowable time extension of 18 calendar months. This allows an entity to have deadlines set for the auto-generation of work orders but still have the flexibility in scheduling complex work schedules. This also allows for that 18 calendar months to act as a buffer, a grace period, in the event of unforeseen events. You will note that this example of a maintenance plan interval has a planned time of 4 years; it also has a built-in time extension allowed within the PSMP and yet does not exceed the maximum time interval allowed by the standard. So while there are no time extensions allowed beyond the standard, an entity can still have substantial flexibility to maintain their Protection System components.

I. If I miss two battery inspections four times out of 100 protection system components on my transmission system, does that count as 2 percent or 8 percent when counting Violation Severity Level (VSL) for R4?

The entity failed to complete its scheduled program on two of its one hundred protection system components which would equate to two percent for application to the VSL Table for Requirement R4.

3. Performance-Based Protection System Maintenance (PBM) Programs

A. I'm a small entity and cannot aggregate a population of Protection System components to establish a segment required for a Performance-Based Protection System Maintenance Program. How can I utilize that opportunity?

Multiple asset owning entities may aggregate their individually owned populations of individual Protection System components to create a segment that crosses ownership boundaries. All entities participating in a joint program should have a single documented joint management process, with consistent Protection System Maintenance Programs (practices, maintenance intervals and criteria), for which the multiple owners are individually responsible with respect to the requirements of the Standard. The requirements established for performance-based maintenance must be met for the overall aggregated program on an ongoing basis.

The aggregated population should reflect all factors that affect consistent performance across the population, including any relevant environmental factors such as geography, power-plant vs. substation, and weather conditions.

B. Can an owner go straight to a performance-based maintenance program schedule, if they have previously gathered records?

Yes. An owner can go to a performance-based maintenance program immediately. The owner will need to comply with the requirements of a performance-based maintenance program as listed in the standard. Gaps in the data collected will not be allowed; therefore, if an owner finds that a gap exists such that they cannot prove that they have collected the data as required for a performance-based maintenance program then they will need to wait until they can prove compliance.

C. When establishing a performance-based maintenance program, can I use test data from the device manufacturer, or industry survey results, as results to help establish a basis for my performance-based intervals?

No. You must use actual in-service test data for the components in the segment.

D. What types of misoperations or events are not considered countable events in the performance-based Protection System Maintenance (PBM) Program?

Countable events are intended to address conditions that are attributed to hardware failure or calibration failure; that is, conditions that reflect deteriorating performance of the component. These conditions include any condition where the device previously worked properly, then, due to changes within the device, malfunctioned.

For this purpose of tracking hardware issues, human errors resulting in Protection System misoperations during system installation or maintenance activities are not considered countable events. Examples of excluded human errors include relay setting errors, design errors, wiring errors, inadvertent tripping of devices during testing or installation, and misapplication of Protection System components. Examples of misapplication of Protection System components include wrong CT or PT tap position, protective relay function misapplication, and components not specified correctly for their installation. Obviously, if one is setting up relevant data about hardware failures then human failures should be eliminated from the hardware performance analysis.

One example of human-error is not pertinent data might be in the area of testing “86” Lock-Out Relays (LOR). “Entity A” has two types of LOR’s type “X” and type “Y”; they want to move into a performance based maintenance interval. They have 1000 of each type, so the population variables are met. During electrical trip testing of all of their various schemes over the initial six-year interval they find zero type “X” failures, but human error led to tripping a BES element 100 times; they find 100 type “Y” failures and had an additional 100 human-error caused tripping incidents. In this example the human-error caused misoperations should not be used to judge the performance of either type of LOR. Analysis of the data might lead “Entity A” to change time intervals. Type “X” LOR can be placed into extended time interval testing because of its low failure rate (zero failures) while Type “Y” would have to be tested more often than every 6 calendar years (100 failures divided by 1000 units exceeds the 4% tolerance level).

Certain types of Protection System component errors that cause misoperations are not considered countable events. Examples of excluded component errors include device malfunctions that are correctable by firmware upgrades and design errors that do not impact protection function.

E. What are some examples of methods of correcting segment performance for Performance-Based Maintenance?

There are a number of methods that may be useful for correcting segment performance for malperforming segments in a performance-based maintenance system. Some examples are listed below.

- The maximum allowable interval, as established by the performance-based maintenance system, can be decreased. This may, however, be slow to correct the performance of the segment.
- Identifiable sub-groups of components within the established segment, which have been identified to be the mal-performing portion of the segment, can be broken out as an independent segment for target action. Each resulting segment must satisfy the minimum population requirements for a performance-based maintenance program in order to remain within the program.
- Targeted corrective actions can be taken to correct frequently occurring problems. An example would be replacement of capacitors within electromechanical distance relays if bad capacitors were determined to be the cause of the mal-performance.
- Components within the mal-performing segment can be replaced with other components (electromechanical distance relays with microprocessor relays, for example) to remove the mal-performing segment.

F. If I find (and correct) a maintenance-correctable issue as a result of a misoperation investigation (Re: PRC-004), how does this affect my performance-based maintenance program?

If you perform maintenance on a Protection System component for any reason (including as part of a PRC-004 required misoperation investigation/corrective action), the actions performed can count as a maintenance activity, and “reset the clock” on everything you’ve done. In a performance-based maintenance program, you also need to record the maintenance-correctable issue with the relevant component group and use it in the analysis to determine your correct performance-based maintenance interval for that component group. Note that “resetting the clock” should not be construed as interfering with an entity’s routine testing schedule because the “clock-reset” would actually make for a decreased time interval by the time the next routine test schedule comes around.

For example a relay scheme, consisting of 4 relays, is tested on 1-1-11 and the PSMP has a time interval of 3 calendar years with an allowable extension of 1 calendar year. The relay would be due again for routine testing before the end of the year 2015. This mythical relay scheme has a misoperation on 6-1-12 that points to one of the four relays as bad. Investigation proves a bad relay and a new one is tested and installed in place of the original. This replacement relay actually could be retested before the end of the year 2016 (clock-reset) and not be out of compliance. This requires tracking maintenance by individual relays and is allowed. However, many companies schedule maintenance in other ways like by substation or by circuit breaker or by relay scheme. By these methods of tracking maintenance that “replaced relay” will be retested before the end of the year 2015. This is also acceptable. In no case was a particular relay tested beyond the PSMP of 4 years max, nor was the 6 year max of the standard exceeded. The entity can reset the clock if they desire or the entity can continue with original schedules and, in effect, test even more frequently.

G. Why are batteries excluded from PBM? What about exclusion of batteries from condition based maintenance?

Batteries are the only element of a Protection System that is a perishable item with a shelf life. As a perishable item batteries require not only a constant float charge to maintain their freshness (charge), but periodic inspection to determine if there are problems associated with their aging process and testing to see if they are maintaining a charge or can still deliver their rated output as required.

Besides being perishable, a second unique feature of a battery that is unlike any other Protection System element is that a battery uses chemicals, metal alloys, plastics, welds, and bonds that must interact with each other to produce the constant dc source required for Protection Systems, undisturbed by ac system disturbances.

No type of battery manufactured today for Protection System application is free from problems that can only be detected over time by inspection and test. These problems can arise from variances in the manufacturing process, chemicals and alloys used in the construction of the individual cells, quality of welds and bonds to connect the components, the plastics used to make batteries and the cell forming process for the individual battery cells.

Other problems that require periodic inspection and testing can result from transportation from the factory to the job site, length of time before a charge is put on the battery, the method of installation, the voltage level and duration of equalize charges, the float voltage level used, and the environment that the battery is installed in.

All of the above mentioned factors and several more not discussed here are beyond the control of the Functional Entities that want to use a performance-based Protection System Maintenance (PBM) program. These inherent variances in the aging process of a battery cell make establishment of a designated segment based on manufacturer and type of battery impossible.

The whole point of PBM is that if all variables are isolated then common aging and performance criteria would be the same. However, there are too many variables in the electro-chemical process to completely isolate all of the performance-changing criteria.

Similarly Functional Entities that want to establish a condition-based maintenance program using the highest levels of monitoring; resulting in the least amount of hands-on maintenance activity, of the battery used in a station dc supply cannot completely eliminate some periodic maintenance. Inspection of the battery is required on a Maximum Maintenance Interval listed in the tables due to the aging processes of station batteries. However, higher degrees of monitoring of a battery can eliminate the requirement for some periodic testing and some inspections (see Table 1-4).

H. Please provide an example of the calculations involved in extending maintenance time intervals using PBM.

Entity has 1000 GE-HEA lock-out relays; this is greater than the minimum sample requirement of 60

They start out testing all of the relays within the prescribed Table requirements (6 year max) by testing the relays every 5 years. The entity's plan is to test 200 units per year; this is greater than the minimum sample size requirement of 30.

For the sake of example only the following will show 6 failures per year, reality may well have different numbers of failures every year. PBM requires annual assessment of failures found per units tested.

After the first year of tests the entity finds 6 failures in the 200 units tested. $6/200 = 3\%$ failure rate.

This entity is now allowed to extend the maintenance interval if they choose.

The entity chooses to extend the maintenance interval of this population segment out to 10 years.

This represents a rate of 100 units tested per year; entity selects 100 units to be tested in the following year.

After that year of testing these 100 units the entity again finds 6 failed units. $6/100 = 6\%$ failures.

This entity has now exceeded the acceptable failure rate for these devices and must accelerate testing of all of the units at a higher rate such that the failure rate is found to be less than 4% per year; the entity has three years to get this failure rate down to 4% or less (per year).

In response to the 6% failure rate, the entity decreases the testing interval to 8 years. This means that they will now test 125 units per year ($1000/8$). The entity has just two years left to get the test rate corrected.

After a year they again find 6 failures out of the 125 units tested. $6/125 = 5\%$ failures.

In response to the 5% failure rate, the entity decreases the testing interval to 7 years. This means that they will now test 143 units per year ($1000/7$). The entity has just one year left to get the test rate corrected.

After a year they again find 6 failures out of the 143 units tested. $6/143 = 4.2\%$ failures.

(Note that the entity has tried 5 years and they were under the 4% limit and they tried 7 years and they were over the 4% limit. They must be back at 4% failures or less in the next year so they might simply elect to go back to 5 years.)

Instead, in response to the 5% failure rate, the entity decreases the testing interval to 6 years. This means that they will now test 167 units per year ($1000/6$).

After a year they again find 6 failures out of the 167 units tested. $6/167 = 3.6\%$ failures.

Entity found that they could maintain the failure rate at no more than 4% failures by maintaining the testing interval at 6 years or less. Entity chose 6 year interval and effectively extended their TBM (5 years) program by 20%.

A note of practicality is that an entity will probably be in better shape to lengthen the intervals between tests if the failure rate is less than 2%. But the requirements allow for annual adjustments if the entity desires. As a matter of maintenance management, an ever-changing test rate (units tested / year) may be un-workable.

Note that the “5% of components” requirement effectively sets a practical limit of 20 year maximum PBM interval. Also of note is the “3 years” requirement; this is there to prevent an entity from “gaming the system”. An entity might arbitrarily extend time intervals from 6 years to 20 years. In the event that an entity finds a failure rate greater than 4% then the test rate must be accelerated such that within three years the failure rate must be brought back down to 4% or less.

Here is a table that demonstrates the values discussed:

Year #	Total Population (P)	Test Interval (I)	Units to be Tested (U= P/I)	# of Failures Found (F)	Failure Rate (=F/U)	Decision to Change Interval Yes or No	Interval Chosen
1	1000	5 yrs	200	6	3%	Yes	10 yrs
2	1000	10 yrs	100	6	6%	Yes	8 yrs
3	1000	8 yrs	125	6	5%	Yes	7 yrs
4	1000	7 yrs	143	6	4.2%	Yes	6 yrs
5	1000	6 yrs	167	6	3.6%	No	6 yrs

V Group by Monitoring Level:

1. All Monitoring Levels

A. Please provide an example of the unmonitored versus other levels of monitoring available?

An unmonitored Protection System has no monitoring and alarm circuits on the Protection System components. A Protection System component that has monitoring attributes but no alarm output connected is considered to be un-monitored.

A monitored Protection System or an individual monitored component of a Protection System has monitoring and alarm circuits on the Protection System components. The alarm circuits must alert, within 24 hours, a location wherein corrective action can be initiated. This location might be, but not limited to an Operations Center, Dispatch Office, Maintenance Center or even a portable SCADA system.

There can be a combination of monitored and unmonitored Protection Systems within any given scheme, substation or plant; there can also be a combination of monitored and unmonitored components within any given Protection System.

Example #1: A combination of monitored and unmonitored components within a given Protection System might be:

- ◇ A microprocessor relay with an internal alarm connected to SCADA to alert 24-hr staffed operations center. (monitored)
- ◇ Instrumentation transformers, with no monitoring, connected as inputs to that relay. (unmonitored)
- ◇ A vented lead-acid battery with low voltage alarm and unintentional grounds detection alarm connected to SCADA. (monitored except for electrolyte level)

- ◇ A circuit breaker with a trip coil and the trip circuit is not monitored. (unmonitored)

Given the particular components and conditions, and using the Table 1 (“Maximum Allowable Testing Intervals and Maintenance Activities”), the particular components have maximum activity intervals of:

- ◇ Every 3 calendar months check electrolyte level (cell voltage and unintentional ground detection is being maintained more frequently by the monitoring system).
- ◇ Every 18 calendar months check battery bank ohmic values (if performance tests are not opted), battery float voltage and battery rack integrity.
- ◇ Every 6 calendar years battery performance test (if ohmic tests are not opted), battery charger alarms verified and trip test circuit breakers, electro-mechanical lock-out relays and auxiliary relays.
- ◇ Every 12 calendar years the microprocessor relay, the instrumentation transformers and the control circuitry are verified.

Example #2: A combination of monitored and unmonitored components within a given Protection System might be:

- ◇ A microprocessor relay with integral alarm that is not connected to SCADA. (unmonitored)
- ◇ Instrument transformers, with no monitoring, connected as inputs to that relay. (monitored)
- ◇ A vented lead-acid battery with low voltage and ground-detection alarms connected to SCADA. (monitored except for electrolyte level)
- ◇ A circuit breaker with a trip coil, with no circuits monitored. (unmonitored)

Given the particular components and conditions, and using the Table 1 (“Maximum Allowable Testing Intervals and Maintenance Activities”), the particular components have maximum activity intervals of:

- ◇ Every 3 calendar months check electrolyte level (cell voltage and unintentional ground detection is being maintained more frequently by the monitoring system).
- ◇ Every 18 calendar months check battery bank ohmic values (if performance tests are not opted), battery float voltage and battery rack integrity.
- ◇ Every 6 calendar years microprocessor relay is verified, battery performance test (if ohmic tests are not opted), battery charger alarms verified and trip test circuit breakers, electro-mechanical lock-out relays and auxiliary relays.
- ◇ Every 12 calendar years the instrumentation transformers and the control circuitry are verified.

Example #3: A combination of monitored and unmonitored components within a given Protection System might be:

- ◇ A microprocessor relay with alarm connected to SCADA to alert 24-hr staffed operations center. (monitored)
- ◇ Instrument transformers, with no monitoring, connected as inputs to that relay (unmonitored)
- ◇ Battery without any alarms connected to SCADA (unmonitored)
- ◇ Circuit breaker with a trip coil, with no circuits monitored (unmonitored)

Given the particular components, conditions, and using the Table 1 (“Maximum Allowable Testing Intervals and Maintenance Activities”), the particular components shall have maximum activity intervals of:

- ◇ Every 3 calendar months check battery bank voltage, check for unintentional grounds and check electrolyte level.
- ◇ Every 18 calendar months check battery bank ohmic values (if performance tests are not opted), battery float voltage and battery rack integrity.
- ◇ Every 6 calendar years battery performance test (if ohmic tests are not opted), battery charger alarms verified and trip test circuit breakers, electro-mechanical lock-out relays and auxiliary relays.
- ◇ Every 12 calendar years the microprocessor relay, the instrumentation transformers and the control circuitry are verified.

B. What is the intent behind the different levels of monitoring?

The intent behind different levels of monitoring is to allow less frequent manual intervention when more information is known about the condition of Protection System components. Condition-Based Maintenance is a valuable asset to improve reliability.

C. Do all monitoring levels apply to all components in a protection system?

No. For some components in a protection system, certain levels of monitoring will not be relevant. For example a battery will always need some kind of inspection.

D. My microprocessor relays and dc circuit alarms are contained on relay panels in a 24-hour attended control room. Does this qualify as an extended time interval condition-based system?

Yes, provided the station attendant (plant operator, etc.) monitors the alarms and other indications (comparable to the monitoring attributes) and reports them within the given time limits that are stated in the criteria of the Tables.

E. When documenting the basis for inclusion of components into the appropriate levels of monitoring as per Requirement R2 of the standard, is it necessary to provide this documentation about the device by listing of every component and the specific monitoring attributes of each device?

No. While maintaining this documentation on the device level would certainly be permissible, it is not necessary. Global statements can be made to document appropriate levels of monitoring for the entire population of a component type or portion thereof.

For example, it would be permissible to document the conclusion that all BES substation dc supply battery chargers are Monitored by stating the following within the program description:
“All substation dc supply battery chargers are considered Monitored and subject to the rows for monitored equipment of Table 1-4 requirements as all substation dc supply battery chargers are equipped with dc voltage alarms and ground detection alarms that are sent to the manned control center.”

Similarly, it would be acceptable to use a combination of a global statement and a device level list of exclusions. Example:

“Except as noted below, all substation dc supply battery chargers are considered Monitored and subject to the rows for monitored equipment of Table 1-4 requirements as all substation dc supply battery chargers are equipped with dc voltage alarms and

ground detection alarms that are sent to the manned control center. The dc supply battery chargers of Substation X, Substation Y, and Substation Z are considered Unmonitored and subject to the rows for unmonitored equipment in Table 1-4 requirements as they are not equipped with ground detection capability.”

Regardless whether this documentation is provided by device listing of monitoring attributes, by global statements of the monitoring attributes of an entire population of component types, or by some combination of these methods, it should be noted that auditors may request supporting drawings or other documentation necessary to validate the inclusion of the device(s) within the appropriate level of monitoring. This supporting background information need not be maintained within the program document structure but should be retrievable if requested by an auditor.

2. Unmonitored Protection Systems

- A. We have an electromechanical (unmonitored) relay that has a trip output to a lockout relay (unmonitored) which trips our transformer off-line by tripping the transformer’s high-side and low-side circuit breakers. What testing must be done for this system?**

This system is made up of components that are all unmonitored. Assuming a time-based protection system maintenance program schedule (as opposed to a performance-based maintenance program), each component must be maintained per the most frequent hands-on activities listed in the Tables 1-1 through 1-5.

3. Monitored Protection Systems

- A. We have a 30 year old oil circuit breaker with a red indicating lamp on the substation relay panel that is illuminated only if there is continuity through the breaker trip coil. There is no SCADA monitor or relay monitor of this trip coil. The line protection relay package that trips this circuit breaker is a microprocessor relay that has an integral alarm relay that will assert on a number of conditions that includes a loss of power to the relay. This alarm contact connects to our SCADA system and alerts our 24-hour operations center of relay trouble when the alarm contact closes. This microprocessor relay trips the circuit breaker only and does not monitor trip coil continuity or other things such as trip current. Is this an unmonitored or a partially-monitored system? How often must I perform maintenance?**

The protective relay is monitored and can be maintained every 12 years or when a maintenance correctable issue arises. The control circuitry has no electro-mechanical parts and can be maintained every 12 years. The trip coil(s) has to be electrically operated at least once every 6 years.

- B. How do I verify the A/D converters of microprocessor-based relays?**

There are a variety of ways to do this. Two examples would be: using values gathered via data communications and automatically comparing these values with values from other sources, or using groupings of other measurements (such as vector summation of bus feeder currents) for comparison. Many other methods are possible.

- C. How is the performance criteria of Protection System communications equipment involved in the maintenance program?**

An entity determines the acceptable performance criteria depending on the technology implemented. If the communications channel performance of a Protection System varies from the pre-determined performance criteria for that system then these results should be investigated and resolved.

- D. My system has alarms that are gathered once daily through an auto-polling system; this is not really a conventional SCADA system but does it meet the Table 1 requirements for inclusion as a monitored system?**

Yes, provided the auto-polling that gathers the alarms reports those alarms to a location where the action can be initiated to correct the maintenance-correctable issue. This location does not have to be the location of the engineer or the technician that will eventually repair the problem, but rather a location where the action can be initiated.

4. Monitored Protection Systems that also monitor alarm path failures

- A. Why are there activities defined for levels of monitoring a Protection System component when that level of technology may not yet be available?**

There may already be some equipment available that is capable of meeting the highest levels of monitoring criteria listed in the Tables. However, even if there is no equipment available today that can meet this level of monitoring the Standard establishes the necessary requirements for when such equipment becomes available. By creating a roadmap for development, this provision makes the Standard technology-neutral. The standard drafting team wants to avoid the need to revise the Standard in a few years to accommodate technology advances that may be coming to the industry.

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