

Consideration of Comments

Project 2012-13 NUC - Nuclear Plant Interface Coordination

The Nuclear Plant Interface Coordination SAR Drafting Team thanks all commenters who submitted comments on the SAR. These standards were posted for a 30-day public comment period from February 12, 2014 through March 13, 2014. Stakeholders were asked to provide feedback on the standards and associated documents through a special electronic comment form. There were 15 sets of comments, including comments from approximately 70 different people from approximately 51 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

All comments submitted may be reviewed in their original format on the standard's [project page](#).

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Mark Lauby, at 404-446-2560 or at mark.lauby@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Standard Processes Manual: http://www.nerc.com/comm/SC/Documents/Appendix_3A_StandardsProcessesManual.pdf

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The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
1.	Group	Guy Zito	Northeast Power Coordinating Council										X

	Additional Member	Additional Organization	Region	Segment Selection
1.	Alan Adamson	New York State Reliability Council, LLC	NPCC	10
2.	David Burke	Orange and Rockland Utilities Inc.	NPCC	3
3.	Greg Campoli	New York Independent System Operator	NPCC	2
4.	Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
5.	Chris de Graffenried	Consolidated Edison Co. of New York, Inc.	NPCC	1
6.	Gerry Dunbar	Northeast Power coordinating Council	NPCC	10
7.	Mike Garton	Dominion Resources Services, Inc.	NPCC	5
8.	Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
9.	Michael Jones	National Grid	NPCC	1

Group/Individual	Commenter	Organization	Registered Ballot Body Segment																	
			1	2	3	4	5	6	7	8	9	10								
10. Mark Kenny	Northeast Utilities	NPCC	1																	
11. Christina Koncz	PSEG Power LLC	NPCC	5																	
12. Helen Lainis	Independent Electricity System Operator	NPCC	2																	
13. Michael Lombardi	Northeast Power Coordinating Council	NPCC	10																	
14. Alan MacNaughton	New Brunswick Power Corporation	NPCC	9																	
15. Bruce Metruck	New York Power Authority	NPCC	6																	
16. Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5																	
17. Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10																	
18. Robert Pellegrini	The Untied Illuminating Company	NPCC	1																	
19. Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1																	
20. David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5																	
21. Brian Robinson	Utility Services	NPCC	8																	
22. Ayesha Sabouba	Hydro One Networks Inc,	NPCC	1																	
23. Brian Shanahan	National Grid	NPCC	1																	
24. Wayne Sipperly	New York Power Authority	NPCC	5																	
25. Ben Wu	Orange and Rockland Utilities Inc.	NPCC	1																	
2.	Group	Cindy Stewart	FirstEnergy Corp		X		X	X	X	X										
	Additional Member	Additional Organization	Region	Segment Selection																
	William Smith	FirstEnergy Corp	RFC	1																
	Cindy Stewart	FirstEnergy Corp	RFC	3																
	Doug Hohlbaugh	Ohio Edison	RFC	4																
	Kenneth Dresner	FirstEnergy Solutions	RFC	5																
	Kevin Querry	FirstEnergy Solutions	RFC	6																
	Rich Hoag		RFC	NA																
	Marissa Mclean		RFC	NA																
	Bill Duge		RFC	NA																
	Steve Wittenauer		RFC	NA																
3.	Group	Joseph DePoorter	MRO NERC Standards Review Forum		X	X	X	X	X	X										
	Additional Member	Additional Organization	Region	Segment Selection																
	1. Alice Ireland	Xcel Energy	MRO	1, 3, 5, 6																
	2. Chuck Wicklund	Otter Tail Power Company	MRO	1, 3, 5																

Group/Individual	Commenter	Organization	Registered Ballot Body Segment																	
			1	2	3	4	5	6	7	8	9	10								
3.	Dan Inman	Minnkota Power Cooperative	MRO	1, 3, 5, 6																
4.	Dave Rudolph	Basin Electric Power Cooperative	MRO	1, 3, 5, 6																
5.	Kayleigh Wilkerson	Lincoln Electric System	MRO	1, 3, 5, 6																
6.	Jodi Jensen	Western Area Power Administration	MRO	1, 6																
7.	Joseph DePoorter	Madison Gas & Electric	MRO	3, 4, 5, 6																
8.	Ken Goldsmith	Alliant Energy	MRO	4																
9.	Mahmood Safi	Omaha Public Power District	MRO	1, 3, 5, 6																
10.	Marie Knox	Midcontinent Independent System Operator	MRO	2																
11.	Mike Brytowski	Great River Energy	MRO	1, 3, 5, 6																
12.	Randi Nyholm	Minnesota Power	MRO	1, 5																
13.	Scott Bos	Muscatine Power & Water	MRO	1, 3, 5, 6																
14.	Terry Harbour	MidAmerican Energy	MRO	1, 3, 5, 6																
15.	Tom Breene	Wisconsin Public Service	MRO	3, 4, 5, 6																
16.	Tony Eddleman	Nebraska Public Power District	MRO	1, 3, 5																
4.	Group	Colby Bellville	Duke Energy		X		X		X	X										
Additional Member Additional Organization Region Segment Selection																				
1.	Doug Hils	Duke Energy	RFC	1																
2.	Lee Schuster	Duke Energy	FRCC	3																
3.	Dale Goodwine	Duke Energy	SERC	5																
4.	Greg Cecil	Duke Energy	RFC	6																
5.	Group	Mike Garton	Dominion		X		X		X	X										
Additional Member Additional Organization Region Segment Selection																				
	Louis Slade	Dominion Resources Services, Inc.	SERC	1, 3, 5, 6																
	Randi Heise	Dominion Resources Services, Inc.	MRO	6																
	Connie Lowe	Dominion Resources Services, Inc.	RFC	5, 6																
	Michael Crowley	Virginia Electric & Power Company	SERC	1, 3, 5, 6																
6.	Group	Marcus Pelt	Southern Company: SOthern Company Sercives, Inc.; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Comapny;		X		X		X	X										

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
			Southern Comapny Genertation; Southern Company Generation and Energy Marketing										
No Additional Responses													
7.	Individual	Bruce Wertz	Wertz & Associates, Inc.										
8.	Individual	Andrew Z. Pusztai	American Transmissionn Company, LLC	X									
9.	Individual	John Brockhan	CenterPoint Energy	X									
10.	Individual	Michael Falvo	Independent Electricity System Operator		X								
11.	Individual	David Thorne	Pepco Holdings Inc.	X		X							
12.	Individual	Tammy Porter	Oncor Electric Delivery Co. LLC	X		X							
13.	Individual	Thomas Foltz	American Electric Power	X		X		X	X				
14.	Individual	Catherine Wesley	PJM Interconnection										
15.	Individual	Lisa Martin	City of Austin dba Austin Energy	X		X	X	X	X				

If you support the comments submitted by another entity and would like to indicate you agree with their comments, please select "agree" below and enter the entity's name in the comment section (please provide the name of the organization, trade association, group, or committee, rather than the name of the individual submitter).

Summary Consideration:

Organization	Agree	Supporting Comments of "Entity Name"
Wertz & Associates, Inc.	Agree	Bruce D Wertz, PresidentWertz and Associates Inc

1. Do you agree with the scope and objectives of this SAR? If not, please explain why you do not agree, and, if possible, provide specific language revisions that would make it acceptable to you.

Summary Consideration:

Organization	Yes or No	Question 1 Comment
Northeast Power Coordinating Council	No	The proposed revisions of NUC-001-2.1 are not in depth enough to address P.81 and the consolidation of redundant requirements. Additionally, there are requirements in NUC-001 that should be moved to other families of standards. For example Requirement R3 should be moved to TPL-001-4, IRO-010-1a R1; Part R9.3.5 should be moved to EOP-005-2, EOP-006-2; Part R9.3.6 move to CIP Standards; Part R9.4.5 move to PER-005-1. NUC-001 should focus on the creation and communication of NPIRs by Nuclear Plant Generator Operators, the other standards should have requirements where applicable to implement the necessary controls around the NPIRs to ensure Nuclear Plants do not violate their NPLRs.
MRO NERC Standards Review Forum	No	In the Section on SAR Information, NSRF recommends that another bullet be added to address the Five Year Review Recommendation #4 on Page 4 which states that the NUC Standard needs to be converted to the Results-based Standard (RBS) format as outlined in Attachment 1 at the next revision.
American Transmission Company, LLC	No	In the Section on SAR Information, ATC recommends that another bullet be added to address the Five Year Review Recommendation #4 on Page 4 which states that the NUC Standard needs to be converted to the Results-based standard (RBS) format as outlined in Attachment 1 at the next revision.

Organization	Yes or No	Question 1 Comment
CenterPoint Energy	No	CenterPoint Energy appreciates the efforts of Project 2012-13 NUC Standard Drafting Team. Additionally, CenterPoint Energy requests that the scope of the project be expanded to include a review of whether Load-Serving Entities can be removed from the Applicability section of NUC-001-2.1. In NERC's 2007-11-19 Petition for the approval of NUC-001-1, the SDT at the time stated that "the drafting team prefers at this time to keep the list of possible entities broad at this stage, with the option to drop some of the entities later." Furthermore, FERC's 2008-10-16 Order 716 which approved NUC-001-1 acknowledged "there is a significant amount of overlap among the entities that perform these functions." CenterPoint Energy believes that Load-Serving Entities do not perform any unique reliability tasks necessary during coordination with Nuclear Plant Generator Operators, and that all such necessary reliability tasks are already being performed by the other applicable functional entities of NUC-001-2.1. Thus, Project 2012-13 provides a good opportunity to delete the redundant Load-Serving Entities function from this Standard.
Duke Energy	Yes	Duke Energy agrees with the changes made by the 5-year Review Team.
PJM Interconnection	Yes	PJM supports the scope of the SAR with particular support for removing the reference to "Protection Systems" as referenced in R7 and R8 of NUC-001-2.1. The SAR, as written, supports development of a results-based standard.
FirstEnergy Corp	Yes	
Dominion	Yes	
Southern Company: SOuthern Company Sercives, Inc.; Alabama Power Company; Georgia Power Company; Gulf Power	Yes	

Organization	Yes or No	Question 1 Comment
Company; Mississippi Power Comapny; Southern Comapny Genertation; Southern Company Generation and Energy Marketing		
Independent Electricity System Operator	Yes	
Pepco Holdings Inc.	Yes	
Oncor Electric Delivery Co. LLC	Yes	
American Electric Power	Yes	
City of Austin dba Austin Energy	Yes	

2. Are you aware of any Canadian provincial or other regulatory requirements that may need to be considered during this project in order to develop a continent-wide approach to the standards? If yes, please identify the jurisdiction and specific regulatory requirements.

Summary Consideration:

Organization	Yes or No	Question 2 Comment
FirstEnergy Corp	No	US entity - not applicable
Northeast Power Coordinating Council	No	
Duke Energy	No	
Dominion	No	
Southern Company: SOuthern Company Sercives,Inc.; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Comapny; Southern Comapny Genertation; Southern Company Generation and Energy Marketing	No	
CenterPoint Energy	No	

Organization	Yes or No	Question 2 Comment
Independent Electricity System Operator	No	
Pepco Holdings Inc.	No	
Oncor Electric Delivery Co. LLC	No	
American Electric Power	No	
PJM Interconnection	No	
City of Austin dba Austin Energy	No	
MRO NERC Standards Review Forum	Yes	This was identified by the FYRT when proposing a definition change in Section E, Regional Differences within the Standard to eliminate a potential unintended conflict with the NERC Glossary of Terms as it relates to Nuclear Plant Licensing Requirements in Canadian Provinces.
American Transmission Company, LLC	Yes	This was identified by the FYRT when proposing to definition change in Section E, Regional Differences within the Standard to eliminate a potential unintended conflict with the NERC Glossary of Terms as it relates to Nuclear Plant Licensing Requirements in Canadian Provinces.

3. Are there any other concerns with this SAR that haven't been covered in previous questions?

Summary Consideration:

Organization	Yes or No	Question 3 Comment
Dominion	No	Dominion offers the following suggestions:1. Under detailed description on Page 3 the below items listed suggests this is being converted to a risk-based standard, but it's not stated.2. Modify the Violation Severity Level and Violation Risk Factor matrices to conform to NERC guidelines. 3. Revise measures to ensure appropriate clarity and applicability to each corresponding requirement. 4. Add Time Horizons to each requirement. 5. Dominion suggests at the end of "conform to NERC guidelines" add for risk-based standards.
Southern Company: SOuthern Company Sercives,Inc.; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Comapny; Southern Comapny Genertation; Southern Company Generation and Energy Marketing	No	
CenterPoint Energy	No	
Independent Electricity System Operator	No	

Organization	Yes or No	Question 3 Comment
Pepco Holdings Inc.	No	
Oncor Electric Delivery Co. LLC	No	
American Electric Power	No	
PJM Interconnection	No	
Northeast Power Coordinating Council	Yes	<p>1. Making Nuclear Plant Generator Operator plural is not necessary. 2. Agree that R5 should be revised for consistency with R4 and to clarify that nuclear plants must be operated to meet the Nuclear Plant Interface Requirements. 3. The SDT proposes to replace the ambiguous term “Protection Systems” with language to clarify requirement applicability. To avoid complicating the Requirements, recommend the SDT include a Rationale Box for R7 and R8 that addresses the original Drafting Team’s intent to identify what information is to be shared by affected entities. 4. Agree that R9 and R9.4.1 should be revised to clarify requirement applicability5. Disagree that Section E. Regional Differences should be revised to remove reference to specific Nuclear Regulatory Commission regulations and to clarify that there are no Canadian Regulatory requirements for electrical power from the electric network to permit safe shutdown. At a minimum a footnote should be provided for source of requirement (i.e. it is the NRC’s NPLR’s that drive most of the NPIRs being identified)6. Adding Time Horizons to each requirement is appropriate.</p>
FirstEnergy Corp	Yes	<p>Look at the use of “Agreement”, “Agreements” and “Agreement(s)” language in the standard. Should these be consistent throughout the entire standard or is there a purpose for the language being different? If there is a reason for the variance in the usage of “Agreement”, “Agreements” and “Agreement(s)”, what is the intent or rational for the differences?</p>
Duke Energy	Yes	<p>Duke Energy believes that the term “electric systems” should be changed to Bulk Electric System (BES) to better align this standard and requirements with the NERC</p>

Organization	Yes or No	Question 3 Comment
		Glossary of Terms. However, if this is not the proper definition, we seek clarification from the 5-year Review Team on the term “electric systems” used in NUC-001. NUC-001 should address coordination, between the Nuclear Plant Generator Operator and the applicable Transmission Entities, of power system design & operation required to support nuclear site emergency preparedness/response. Transmission entities need to ensure they are not doing things that purposely disable facilities relied on to mitigate site events.
City of Austin dba Austin Energy	Yes	City of Austin dba Austin Energy (AE) supports the efforts of the Project 2012-13 NUC Standard Drafting Team (SDT). AE requests the SDT expand the scope of the project to include a review of whether Load-Serving Entities can be removed from the Applicability section of NUC-001-2.1. AE supports CenterPoint Energy’s comment in this regard.

END OF REPORT