



December 11, 2007

VIA ELECTRONIC FILING

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

**Re: North American Electric Reliability Corporation
Docket No. RM08-3-000**

Dear Ms. Bose:

On November 19, 2007, the North American Electric Reliability Corporation (“NERC”) submitted a petition in accordance with Section 215(d)(1) of the Federal Power Act (“FPA”) and Part 39.5 of the Commission’s regulations seeking approval of the proposed reliability standard of NERC, NUC-001-1 — Nuclear Plant Interface Coordination standard.

By this filing, NERC amends its November 19 filing to expressly request Commission approval of the addition of four terms and definitions to the Commission-approved NERC Glossary.¹ These four terms and conditions appear in the proposed standard NUC-001-1:

Nuclear Plant Generator Operator: Any Generator Operator or Generator Owner that is a Nuclear Plant Licensee responsible for operation of a nuclear facility licensed to produce commercial power.

Nuclear Plant Off-site Power Supply (Off-site Power): The electric power supply provided from the electric system to the nuclear power plant distribution system as required per the nuclear power plant license.

Nuclear Plant Licensing Requirements (NPLRs): Requirements included in the design basis of the nuclear plant and statutorily mandated

¹ The Commission approved the NERC Glossary in *Mandatory Reliability Standards for the Bulk-Power System*, 118 FERC ¶ 61,218, FERC Stats. & Regs. ¶ 31,242 (2007) (Order No. 693), *order on reh’g*, *Mandatory Reliability Standards for the Bulk-Power System*, 120 FERC ¶ 61,053 (Order No. 693-A) (2007).

for the operation of the plant, including nuclear power plant licensing requirements for:

- 1) Off-site power supply to enable safe shutdown of the plant during an electric system or plant event; and
- 2) Avoiding preventable challenges to nuclear safety as a result of an electric system disturbance, transient, or condition.

Nuclear Plant Interface Requirements (NPIRs): The requirements, based on NPLRs and Bulk Electric System requirements, that have been mutually agreed to by the Nuclear Plant Generator Operator and the applicable Transmission Entities.

In Order No. 693, the Commission recognized the importance of the NERC Glossary and terms therein. The Commission stated that:

The terms defined in the glossary have an important role in establishing consistent understanding of the Reliability Standards Requirements and implementation. The approval of the glossary will provide continuity in application of the glossary definitions industry-wide, and will eliminate multiple interpretations of the same term or function, which may otherwise create miscommunication and jeopardize Bulk-Power System reliability.²

The Commission further held that:

The glossary should be updated through the Reliability Standards development process whenever a new or revised Reliability Standard that includes a new defined term is approved, or as needed to clarify compliance activities.³

As explained in the development record of the proposed standard, NUC-001-1, the four terms and definitions identified above were developed by the standard drafting team as part of the proposed standard pursuant to the NERC *Reliability Standard Development Procedure* and NERC Rules of Procedure. These terms and definitions were balloted along with the proposed standard and were subsequently approved by the ballot body. It is appropriate and necessary, therefore, that these terms and definitions be added to the NERC Glossary, upon approval of the proposed standard NUC-001-1, to facilitate a common and consistent understanding of the reliability standard requirements.

² Order No. 693 at P 1893.

³ *Id.*

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Accordingly, NERC respectfully requests that the Commission approve the terms and definitions as discussed herein.

Respectfully submitted,

/s/ Rebecca J. Michael

Rebecca J. Michael

*Attorney for North American Electric
Reliability Corporation*

cc: Service lists in RM06-16-000 and RM08-3-000