

**Comment Form for Supplement to Project 2007-23 — Replace Levels of Non Compliance with Violation Severity Levels — NUC-001-1**

Please use this form to submit comments on the proposed Violation Severity Levels (VSLs) for the Nuclear Interface Coordination Standard (NUC-001-1). Comments must be submitted by **November 26, 2007**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "NUC VSL" in the subject line. If you have questions please contact Stephen Crutchfield at [stephen.crutchfield@nerc.net](mailto:stephen.crutchfield@nerc.net) or by telephone at 609-651-9455. You may also contact Al Calafiore at [al.calafiore@nerc.net](mailto:al.calafiore@nerc.net) or by telephone at 678.524.1188

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Thad Ness	
Organization:	AEP	
Telephone:	614-716-2053	
E-mail:	tkness@aep.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input checked="" type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



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### **Background Information:**

The Federal Energy Regulatory Commission (FERC) directed NERC to replace the current Levels of Non-Compliance, where they exist in the 83 FERC-approved standards, with Violation Severity Levels (VSL) and to do so by March 1, 2008.

The VSL Drafting Team started this project by drafting a set of VSL development guidelines to promote a consistent approach for assigning VSLs. The VSL DT then used these draft guidelines to develop proposed VSLs for the 83 affected standards. The VSL DT worked with existing SAR and standard drafting teams (SDTs) to collect feedback on the development guidelines and the VSLs proposed by the VSL DT. The [VSL Development Criteria Guidelines and the set of VSLs](#) are posted for comment through November 26, 2007.

The Nuclear Plant Interface Coordination standard that was approved earlier this year does have "Violation Severity Levels," but these VSLs were not developed using the proposed guidelines, and they don't provide the desired level of flexibility in assessing partial compliance with proposed requirements. There are only five VSLs in the approved standard, compared to 31 in the proposed set of VSLs. The VSL DT worked with members of the "retired" Nuclear SDT to draft a set of VSLs for the requirements in NUC-001-1. This "supplementary" comment form is solely for collection of stakeholder feedback on the acceptability of the proposed VSLs for [NUC-001-1](#). The intent is to collect feedback on these VSLs and include these VSLs in the sets of VSLs to be balloted by stakeholders later this year.

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1. The development of VSLs must be in keeping with the objective of maintaining a reliable system. Any suggested changes in a VSL must reflect this objective.
2. Importance or impact on the system does not affect or influence VSL — as the VSL is a measure of how badly a requirement was violated.
3. The actual VSL incurred as a result of non-compliance with a standard is determined after the fact. This is different than Violation Risk Factors which are determined at the time a standard is being developed.

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1. Please review the draft Violation Severity Levels for the Nuclear Plant Interface Coordination Standard NUC-001-1; then in the following table, please provide alternate language for any VSL that you disagree with. (Please enter all comments in simple text format.)

Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
NUC-001-1	R1.	The responsible entity's program/procedure is non-compliant with respect to one or more minor details within the requirement.	The responsible entity's program/procedure is non-compliant with respect to one or more significant element within the requirement.	N/A	N/A
NUC-001-1	R2.	The responsible entity's program/procedure is non-compliant with respect to one or more minor details within the requirement.	The responsible entity's program/procedure is non-compliant with respect to one or more significant element within the requirement.	N/A	N/A
NUC-001-1	R3.	The responsible entity's program/procedure is non-compliant with respect to one or more minor details within the requirement.	The responsible entity's program/procedure is non-compliant with respect to one significant element within the requirement.	The responsible entity's program/procedure is non-compliant with respect to two or more significant elements within the requirement.	N/A
NUC-001-1	R4.	The responsible entity's program/procedure is non-compliant with respect to one or more minor details within the requirement.	The responsible entity's program/procedure is non-compliant with respect to one significant element within the requirement.	The responsible entity's program/procedure is non-compliant with respect to two or more significant elements within the requirement.	N/A
NUC-001-1	R5.	The responsible entity's program/procedure is non-compliant with respect to one or more minor details within the requirement.	The responsible entity's program/procedure is non-compliant with respect to one significant element within the requirement.	The responsible entity's program/procedure is non-compliant with respect to two or more significant elements within the requirement.	N/A
NUC-001-1	R6.	The responsible entity's coordination/communication is non-compliant with respect to one or more minor details within the	The responsible entity's coordination/communication is non-compliant with respect to one significant element within the requirement.	The responsible entity's coordination/communication is non-compliant with respect to two or more significant elements within the	N/A

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Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		requirement.		requirement.	
NUC-001-1	R7.	The responsible entity's is non-compliant in the reporting of required information with respect to one or more minor details within the requirement.	The responsible entity's is non-compliant in the reporting of required information with respect to one significant element within the requirement.	The responsible entity's is non-compliant in the reporting of required information with respect to more than one significant element within the requirement.	N/A
NUC-001-1	R8.	The responsible entity's is non-compliant in the reporting of required information with respect to one or more minor details within the requirement.	The responsible entity's is non-compliant in the reporting of required information with respect to one significant element within the requirement.	The responsible entity's is non-compliant in the reporting of required information with respect to more than one significant element within the requirement.	N/A
NUC-001-1	R9.	The responsible entity failed to comply with less than 25% of the number of subcomponents within the requirement.	The responsible entity failed to comply with 50% or more of the number of subcomponents within the requirement.	N/A	N/A

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Comments:

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
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E-mail:	jshaver@atcllc.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input checked="" type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
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The VSL DT requests that you consider the following in developing your comments:

1. The development of VSLs must be in keeping with the objective of maintaining a reliable system. Any suggested changes in a VSL must reflect this objective.
2. Importance or impact on the system does not affect or influence VSL — as the VSL is a measure of how badly a requirement was violated.
3. The actual VSL incurred as a result of non-compliance with a standard is determined after the fact. This is different than Violation Risk Factors which are determined at the time a standard is being developed.

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1. Please review the draft Violation Severity Levels for the Nuclear Plant Interface Coordination Standard NUC-001-1; then in the following table, please provide alternate language for any VSL that you disagree with. (Please enter all comments in simple text format.)

Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
NUC-001-1	R1.				
NUC-001-1	R2.				
NUC-001-1	R3.				
NUC-001-1	R4.	Please identify what requirements are minor and what requirements are major.	Please identify what requirements are minor and what requirements are major.	Please identify what requirements are minor and what requirements are major.	
NUC-001-1	R5.	Please identify what requirements are minor and what requirements are major.	Please identify what requirements are minor and what requirements are major.	Please identify what requirements are minor and what requirements are major.	
NUC-001-1	R6.				
NUC-001-1	R7.				
NUC-001-1	R8.				
NUC-001-1	R9.	Is this VSL stating that each sub-requirement has to be addressed in the NPIR even if that sub-requirement does not apply? Take a case were the Nuclear Plant Generator Owner has several agreements in place with different Transmission Entities to meet all the NUC-001	Is this VSL stating that each sub-requirement has to be addressed in the NPIR even if that sub-requirement does not apply? Take a case were the Nuclear Plant Generator Owner has several agreements in place with different Transmission Entities to meet all the NUC-001 requirements. Would identifying a sub-requirement	Is this VSL stating that each sub-requirement has to be addressed in the NPIR even if that sub-requirement does not apply? Take a case were the Nuclear Plant Generator Owner has several agreements in place with different Transmission Entities to meet all the NUC-001 requirements. Would identifying a sub-requirement	Is this VSL stating that each sub-requirement has to be addressed in the NPIR even if that sub-requirement does not apply? Take a case were the Nuclear Plant Generator Owner has several agreements in place with different Transmission Entities to meet all the NUC-001 requirements. Would identifying a sub-requirement

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Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		requirements. Would identifying a sub-requirement as not-applicable in its agreement count as satisfying the VSL term "identified"?	as not-applicable in its agreement count as satisfying the VSL term "identified"?	as not-applicable in its agreement count as satisfying the VSL term "identified"?	as not-applicable in its agreement count as satisfying the VSL term "identified"?

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NUC-001-1	R1.				
NUC-001-1	R2.				
NUC-001-1	R3.				
NUC-001-1	R4.			<p>The applicable Transmission Entities are non-compliant with more than one of the following significant elements within the requirement:</p> <ul style="list-style-type: none"> <li>• incorporate the NPIRs into operating analyses</li> <li>• operate the electric system to meet NPIRs</li> <li>• inform the Nuclear Plant Generator Operator when the ability to assess the operation of the electric system affecting NPIRs is lost.</li> </ul>	
NUC-001-1	R5.			<p>The Nuclear Plant Generator Operator did not operate the plant with respect to more than one significant element within the agreements</p>	

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Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
NUC-001-1	R6.				
NUC-001-1	R7.	The Nuclear Plant Generator Operator is non-compliant with respect to one or more minor details within the requirement.	The Nuclear Plant Generator Operator did not inform the applicable Transmission Entities of actual/proposed changes to nuclear plant design, configuration, operations, limits, protection systems, OR capabilities that may impact the ability of the electric system to meet the NPIRs.	The Nuclear Plant Generator Operator did not inform the applicable Transmission Entities of actual/proposed changes to nuclear plant design, configuration, operations, limits, protection systems, AND capabilities that may impact the ability of the electric system to meet the NPIRs.	The Nuclear Plant Generator Operator did not inform the applicable Transmission Entities of actual/proposed changes to nuclear plant design, configuration, operations, limits, protection systems, or capabilities that may impact the ability of the electric system to meet the NPIRs.
NUC-001-1	R8.	The applicable Transmission Entities are non-compliant with respect to one of more minor details within the requirement.	The applicable Transmission Entities did not inform the Nuclear Plant Generator Operator of actual/proposed changes to transmission system design, configuration, operations, limits, protection systems, OR capabilities that may impact the ability of the electric system to meet the NPIRs.	The applicable Transmission Entities did not inform the Nuclear Plant Generator Operator of actual/proposed changes to transmission system design, configuration, operations, limits, protection systems, AND capabilities that may impact the ability of the electric system to meet the NPIRs.	The applicable Transmission Entities did not inform the Nuclear Plant Generator Operator of actual/proposed changes to transmission system design, configuration, operations, limits, protection systems, or capabilities that may impact the ability of the electric system to meet the NPIRs.
NUC-001-1	R9.				

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Comments:

1. Requirement 3 – The language for High VSL seems more appropriate for Severe VSL based on VSL Development Guidelines Criteria Chapter 3.
2. Requirement 6 - The language for High VSL seems more appropriate for Severe VSL based on VSL Development Guidelines Criteria Chapter 5.

3. Many of the requirements do not have language for each VSL category. For example, non-compliance with all the elements of a requirement would generally fall into the VSL Severe category. It would seem that each requirement would have a description in the Severe category
4. Requirement 7 the word proposed in the severity levels concerning changes to the Nuclear Plant that may not have been given to the Transmission Entity is a little to encompassing. This could be said about requirement 8 also.

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<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Will Franklin	
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NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
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NUC-001-1	R1.		Did not provide to at least one Transmission Entity	Did not provide to more than one Transmission Entity	Did not provide to any Transmission Entity
NUC-001-1	R2.	The Nuclear Plant GeneratorOperator or the applicable Transmission Entity does not have in effect one or more agreements that include NPIRs and documents the implementation of the NPIRs.			n/a
NUC-001-1	R3.				
NUC-001-1	R4.				
NUC-001-1	R5.				
NUC-001-1	R6.				
NUC-001-1	R7.				
NUC-001-1	R8.				
NUC-001-1	R9.				

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Comments:

R1 VSLs introduce another dimension whereby an entity can be doubly penalized - "incomplete" information and not providing it to all entities.

The use of the subjective terms "minor", "significant", "material", "mostly", and "substantially", should be changed to more definitive terms.

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<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Alessia Dawes	
Organization:	Hydro One Networks	
Telephone:	416-345-5286	
E-mail:	alessia.dawes@hdyroone.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## **Comment Form — Supplement to Project 2007-23 – Replace Levels of Non-Compliance with Violation Severity Levels – NUC-001-1**

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### **Background Information:**

The Federal Energy Regulatory Commission (FERC) directed NERC to replace the current Levels of Non-Compliance, where they exist in the 83 FERC-approved standards, with Violation Severity Levels (VSL) and to do so by March 1, 2008.

The VSL Drafting Team started this project by drafting a set of VSL development guidelines to promote a consistent approach for assigning VSLs. The VSL DT then used these draft guidelines to develop proposed VSLs for the 83 affected standards. The VSL DT worked with existing SAR and standard drafting teams (SDTs) to collect feedback on the development guidelines and the VSLs proposed by the VSL DT. The [VSL Development Criteria Guidelines and the set of VSLs](#) are posted for comment through November 26, 2007.

The Nuclear Plant Interface Coordination standard that was approved earlier this year does have "Violation Severity Levels," but these VSLs were not developed using the proposed guidelines, and they don't provide the desired level of flexibility in assessing partial compliance with proposed requirements. There are only five VSLs in the approved standard, compared to 31 in the proposed set of VSLs. The VSL DT worked with members of the "retired" Nuclear SDT to draft a set of VSLs for the requirements in NUC-001-1. This "supplementary" comment form is solely for collection of stakeholder feedback on the acceptability of the proposed VSLs for [NUC-001-1](#). The intent is to collect feedback on these VSLs and include these VSLs in the sets of VSLs to be balloted by stakeholders later this year.

The VSL DT requests that you consider the following in developing your comments:

1. The development of VSLs must be in keeping with the objective of maintaining a reliable system. Any suggested changes in a VSL must reflect this objective.
2. Importance or impact on the system does not affect or influence VSL — as the VSL is a measure of how badly a requirement was violated.
3. The actual VSL incurred as a result of non-compliance with a standard is determined after the fact. This is different than Violation Risk Factors which are determined at the time a standard is being developed.

We request that you include your comments on this form and e-mail the form to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "NUC VSL" by **November 26, 2007**.

**Comment Form — Supplement to Project 2007-23 – Replace Levels of Non-Compliance with Violation Severity Levels – NUC-001-1**

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1. Please review the draft Violation Severity Levels for the Nuclear Plant Interface Coordination Standard NUC-001-1; then in the following table, please provide alternate language for any VSL that you disagree with. (Please enter all comments in simple text format.)

Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
NUC-001-1	R1.				
NUC-001-1	R2.				
NUC-001-1	R3.				
NUC-001-1	R4.				
NUC-001-1	R5.				
NUC-001-1	R6.				
NUC-001-1	R7.				
NUC-001-1	R8.				
NUC-001-1	R9.				

2. If there any other comments you wish to provide to the drafting team that you have not already provided in response to the question above, please provide them here.

Comments: In Lower VSL and Moderate VSL for requirements R4 and R5, how will 'minor' and 'significant' NPIR elements be measured? What constitutes a 'minor' and 'significant' element? As currently worded VSL's for R4 and R5 are subject to interpretation.

**Comment Form for Supplement to Project 2007-23 — Replace Levels of Non Compliance with Violation Severity Levels — NUC-001-1**

Please use this form to submit comments on the proposed Violation Severity Levels (VSLs) for the Nuclear Interface Coordination Standard (NUC-001-1). Comments must be submitted by **November 26, 2007**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "NUC VSL" in the subject line. If you have questions please contact Stephen Crutchfield at [stephen.crutchfield@nerc.net](mailto:stephen.crutchfield@nerc.net) or by telephone at 609-651-9455. You may also contact Al Calafiore at [al.calafiore@nerc.net](mailto:al.calafiore@nerc.net) or by telephone at 678.524.1188

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Ron Falsetti	
Organization:	Ontario IESO	
Telephone:	905-855-6187	
E-mail:	ron.falsetti@ieso.ca	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## **Comment Form — Supplement to Project 2007-23 – Replace Levels of Non-Compliance with Violation Severity Levels – NUC-001-1**

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### **Background Information:**

The Federal Energy Regulatory Commission (FERC) directed NERC to replace the current Levels of Non-Compliance, where they exist in the 83 FERC-approved standards, with Violation Severity Levels (VSL) and to do so by March 1, 2008.

The VSL Drafting Team started this project by drafting a set of VSL development guidelines to promote a consistent approach for assigning VSLs. The VSL DT then used these draft guidelines to develop proposed VSLs for the 83 affected standards. The VSL DT worked with existing SAR and standard drafting teams (SDTs) to collect feedback on the development guidelines and the VSLs proposed by the VSL DT. The [VSL Development Criteria Guidelines and the set of VSLs](#) are posted for comment through November 26, 2007.

The Nuclear Plant Interface Coordination standard that was approved earlier this year does have "Violation Severity Levels," but these VSLs were not developed using the proposed guidelines, and they don't provide the desired level of flexibility in assessing partial compliance with proposed requirements. There are only five VSLs in the approved standard, compared to 31 in the proposed set of VSLs. The VSL DT worked with members of the "retired" Nuclear SDT to draft a set of VSLs for the requirements in NUC-001-1. This "supplementary" comment form is solely for collection of stakeholder feedback on the acceptability of the proposed VSLs for [NUC-001-1](#). The intent is to collect feedback on these VSLs and include these VSLs in the sets of VSLs to be balloted by stakeholders later this year.

The VSL DT requests that you consider the following in developing your comments:

1. The development of VSLs must be in keeping with the objective of maintaining a reliable system. Any suggested changes in a VSL must reflect this objective.
2. Importance or impact on the system does not affect or influence VSL — as the VSL is a measure of how badly a requirement was violated.
3. The actual VSL incurred as a result of non-compliance with a standard is determined after the fact. This is different than Violation Risk Factors which are determined at the time a standard is being developed.

We request that you include your comments on this form and e-mail the form to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "NUC VSL" by **November 26, 2007**.

**Comment Form — Supplement to Project 2007-23 – Replace Levels of Non-Compliance with Violation Severity Levels – NUC-001-1**

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1. Please review the draft Violation Severity Levels for the Nuclear Plant Interface Coordination Standard NUC-001-1; then in the following table, please provide alternate language for any VSL that you disagree with. (Please enter all comments in simple text format.)

Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
NUC-001-1	R1.				
NUC-001-1	R2.				
NUC-001-1	R3.				
NUC-001-1	R4.				
NUC-001-1	R5.				
NUC-001-1	R6.				
NUC-001-1	R7.				
NUC-001-1	R8.				
NUC-001-1	R9.				

2. If there any other comments you wish to provide to the drafting team that you have not already provided in response to the question above, please provide them here.

Comments: The IESO is in general agreement with the VSLs that have been assigned to the NUC-001 standard. We would also like to commend the SDT for staying away from developing VSLs for the subrequirements (Requirement #9). However, we would like to point out the fact that there should be an alignment between VRFs and VSLs - for example, R1 has a "lower" violation risk factor but could have as high as a severe violation severity level. While there are other requirements with "Medium" VRF but top out at High violation severity level.

**Comment Form for Supplement to Project 2007-23 — Replace Levels of Non Compliance with Violation Severity Levels — NUC-001-1**

Please use this form to submit comments on the proposed Violation Severity Levels (VSLs) for the Nuclear Interface Coordination Standard (NUC-001-1). Comments must be submitted by **November 26, 2007**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "NUC VSL" in the subject line. If you have questions please contact Stephen Crutchfield at [stephen.crutchfield@nerc.net](mailto:stephen.crutchfield@nerc.net) or by telephone at 609-651-9455. You may also contact Al Calafiore at [al.calafiore@nerc.net](mailto:al.calafiore@nerc.net) or by telephone at 678.524.1188

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Alicia Daugherty, Manager, NERC & Regional Coordination Department	
Organization:	PJM Interconnection	
Telephone:	610-666-4597	
E-mail:	daugha@pjm.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



**Comment Form — Supplement to Project 2007-23 – Replace Levels of Non-Compliance with Violation Severity Levels – NUC-001-1**

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\*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

## **Comment Form — Supplement to Project 2007-23 – Replace Levels of Non-Compliance with Violation Severity Levels – NUC-001-1**

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### **Background Information:**

The Federal Energy Regulatory Commission (FERC) directed NERC to replace the current Levels of Non-Compliance, where they exist in the 83 FERC-approved standards, with Violation Severity Levels (VSL) and to do so by March 1, 2008.

The VSL Drafting Team started this project by drafting a set of VSL development guidelines to promote a consistent approach for assigning VSLs. The VSL DT then used these draft guidelines to develop proposed VSLs for the 83 affected standards. The VSL DT worked with existing SAR and standard drafting teams (SDTs) to collect feedback on the development guidelines and the VSLs proposed by the VSL DT. The [VSL Development Criteria Guidelines and the set of VSLs](#) are posted for comment through November 26, 2007.

The Nuclear Plant Interface Coordination standard that was approved earlier this year does have "Violation Severity Levels," but these VSLs were not developed using the proposed guidelines, and they don't provide the desired level of flexibility in assessing partial compliance with proposed requirements. There are only five VSLs in the approved standard, compared to 31 in the proposed set of VSLs. The VSL DT worked with members of the "retired" Nuclear SDT to draft a set of VSLs for the requirements in NUC-001-1. This "supplementary" comment form is solely for collection of stakeholder feedback on the acceptability of the proposed VSLs for [NUC-001-1](#). The intent is to collect feedback on these VSLs and include these VSLs in the sets of VSLs to be balloted by stakeholders later this year.

The VSL DT requests that you consider the following in developing your comments:

1. The development of VSLs must be in keeping with the objective of maintaining a reliable system. Any suggested changes in a VSL must reflect this objective.
2. Importance or impact on the system does not affect or influence VSL — as the VSL is a measure of how badly a requirement was violated.
3. The actual VSL incurred as a result of non-compliance with a standard is determined after the fact. This is different than Violation Risk Factors which are determined at the time a standard is being developed.

We request that you include your comments on this form and e-mail the form to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "NUC VSL" by **November 26, 2007**.

**Comment Form — Supplement to Project 2007-23 – Replace Levels of Non-Compliance with Violation Severity Levels – NUC-001-1**

1. Please review the draft Violation Severity Levels for the Nuclear Plant Interface Coordination Standard NUC-001-1; then in the following table, please provide alternate language for any VSL that you disagree with. (Please enter all comments in simple text format.)

Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
NUC-001-1	R1.	-	-	The Nuclear Plant Generator Operator did provide the proposed NPIRs in writing to the applicable Transmission Entities but did not verify receipt.	The Nuclear Plant Generator Operator did not provide the proposed NPIRs in writing to the applicable Transmission Entities.
NUC-001-1	R2.	The Nuclear Plant Generator and the Transmission Entity discussed incorporation of the NPIRs, but did not develop an agreement.	The Transmission Entity did not incorporate one NPIR into its planning and operations processes.	The Transmission Entity did not incorporate more than one NPIR into its planning and operations processes.	The Transmission Entity did not discuss the incorporation of the NPIRs into planning and operations processes.
NUC-001-1	R3.	-	-	The applicable Transmission Entities did incorporate the NPIRs into their planning analyses of the electric system but did not communicate the results of these analyses to the Nuclear Plant Generator Operator.	The applicable Transmission Entities did not incorporate the NPIRs into their planning analyses of the electric system
NUC-001-1	R4.	-	The applicable Transmission Entities did incorporate the NPIRs into their operating analyses of the electric system and did operate the electric system to meet the NPIRs, but did not inform the Nuclear Plant Generator Operator when the ability to assess the operation of the electric system affecting NPIRs is lost.	The applicable Transmission Entities did incorporate the NPIRs into their operating analyses of the electric system but failed to operate the electric system to meet the NPIRs or did not inform the Nuclear Plant Generator Operator when the ability to assess the operation of the electric system affecting NPIRs is lost.	The applicable Transmission Entities did not Incorporate the NPIRs into their operating analyses of the electric system or did not Operate the electric system to meet the NPIRs or did not Inform the Nuclear Plant Generator Operator when the ability to assess the operation of the electric system affecting NPIRs is lost.

**Comment Form — Supplement to Project 2007-23 – Replace Levels of Non-Compliance with Violation Severity Levels – NUC-001-1**

Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
NUC-001-1	R5.	Recommend use of generic criteria wording per VSL Guidelines document.	Recommend use of generic criteria wording per VSL Guidelines document.	Recommend use of generic criteria wording per VSL Guidelines document.	The Nuclear Plant Generator Operator did not operate per the Agreements developed in accordance with this standard.
NUC-001-1	R6.	-	-	-	The entity did not coordinate outages and maintenance activities which affect the NPIRs.
NUC-001-1	R7.	Recommend use of generic criteria wording per VSL Guidelines document.	Recommend use of generic criteria wording per VSL Guidelines document.	Recommend use of generic criteria wording per VSL Guidelines document.	The Nuclear Plant Generator Operator did not inform the applicable Transmission Entities of actual or proposed changes to nuclear plant design, configuration, operations, limits, protection systems, or capabilities that may impact the ability of the electric system to meet the NPIRs
NUC-001-1	R8.	Recommend use of generic criteria wording per VSL Guidelines document.	Recommend use of generic criteria wording per VSL Guidelines document.	Recommend use of generic criteria wording per VSL Guidelines document.	The applicable Transmission Entities did not inform the Nuclear Plant Generator Operator of actual or proposed changes to electric system design, configuration, operations, limits, protection systems, or capabilities that may impact the ability of the electric system to meet the NPIRs
NUC-001-1	R9.	The agreement between the Nuclear Plant Generator Operator and the applicable Transmission Entities did not contain one or more of the required administrative	The agreement between the Nuclear Plant Generator Operator and the applicable Transmission Entities did not contain one or more of the required technical elements, operations and maintenance	The agreement between the Nuclear Plant Generator Operator and the applicable Transmission Entities did not contain three or more of the required technical elements, operations and maintenance	The agreement between the Nuclear Plant Generator Operator and the applicable Transmission Entities did not contain several of the required technical elements, operations and maintenance

**Comment Form — Supplement to Project 2007-23 – Replace Levels of Non-Compliance with Violation Severity Levels – NUC-001-1**

Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		elements.	elements, or communications and training elements.	elements, or communications and training elements.	elements, or communications and training elements.

- If there any other comments you wish to provide to the drafting team that you have not already provided in response to the question above, please provide them here.

Comments: These comments are provided as a supplement to PJM's other comments submitted per Comment Form for Project 2007-23 - Replace Levels of Non Compliance with Violation Severity Levels.

**Comment Form for Supplement to Project 2007-23 — Replace Levels of Non Compliance with Violation Severity Levels — NUC-001-1**

Please use this form to submit comments on the proposed Violation Severity Levels (VSLs) for the Nuclear Interface Coordination Standard (NUC-001-1). Comments must be submitted by **November 26, 2007**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "NUC VSL" in the subject line. If you have questions please contact Stephen Crutchfield at [stephen.crutchfield@nerc.net](mailto:stephen.crutchfield@nerc.net) or by telephone at 609-651-9455. You may also contact Al Calafiore at [al.calafiore@nerc.net](mailto:al.calafiore@nerc.net) or by telephone at 678.524.1188

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Mike Gentry	
Organization:	Salt River Project	
Telephone:	602-236-6408	
E-mail:	Mike.Gentry@srpnet.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## **Comment Form — Supplement to Project 2007-23 – Replace Levels of Non-Compliance with Violation Severity Levels – NUC-001-1**

---

### **Background Information:**

The Federal Energy Regulatory Commission (FERC) directed NERC to replace the current Levels of Non-Compliance, where they exist in the 83 FERC-approved standards, with Violation Severity Levels (VSL) and to do so by March 1, 2008.

The VSL Drafting Team started this project by drafting a set of VSL development guidelines to promote a consistent approach for assigning VSLs. The VSL DT then used these draft guidelines to develop proposed VSLs for the 83 affected standards. The VSL DT worked with existing SAR and standard drafting teams (SDTs) to collect feedback on the development guidelines and the VSLs proposed by the VSL DT. The [VSL Development Criteria Guidelines and the set of VSLs](#) are posted for comment through November 26, 2007.

The Nuclear Plant Interface Coordination standard that was approved earlier this year does have "Violation Severity Levels," but these VSLs were not developed using the proposed guidelines, and they don't provide the desired level of flexibility in assessing partial compliance with proposed requirements. There are only five VSLs in the approved standard, compared to 31 in the proposed set of VSLs. The VSL DT worked with members of the "retired" Nuclear SDT to draft a set of VSLs for the requirements in NUC-001-1. This "supplementary" comment form is solely for collection of stakeholder feedback on the acceptability of the proposed VSLs for [NUC-001-1](#). The intent is to collect feedback on these VSLs and include these VSLs in the sets of VSLs to be balloted by stakeholders later this year.

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2. Importance or impact on the system does not affect or influence VSL — as the VSL is a measure of how badly a requirement was violated.
3. The actual VSL incurred as a result of non-compliance with a standard is determined after the fact. This is different than Violation Risk Factors which are determined at the time a standard is being developed.

We request that you include your comments on this form and e-mail the form to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "NUC VSL" by **November 26, 2007**.

**Comment Form — Supplement to Project 2007-23 – Replace Levels of Non-Compliance with Violation Severity Levels – NUC-001-1**

---

1. Please review the draft Violation Severity Levels for the Nuclear Plant Interface Coordination Standard NUC-001-1; then in the following table, please provide alternate language for any VSL that you disagree with. (Please enter all comments in simple text format.)

Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
NUC-001-1	R1.				The Nuclear Plant Generator Operator did not provide the proposed NPIR's to one or more applicable entities. It should be a severe VSL if the NPG fails to provide ANY NPIR's to any applicable entities
NUC-001-1	R2.				
NUC-001-1	R3.				
NUC-001-1	R4.				
NUC-001-1	R5.				
NUC-001-1	R6.				
NUC-001-1	R7.				
NUC-001-1	R8.				
NUC-001-1	R9.				

2. If there any other comments you wish to provide to the drafting team that you have not already provided in response to the question above, please provide them here.

Comments: There should be a mechanism that does not declare non compliance for Transmission Entities that do not receive any NPIR's from a Nuclear Plant Generator (NPG). The Transmission Entity can't be held non-compliant in the face of zero NPIR's from their neighboring NPG.