

Consideration of Comments on Supplement to Project 2007-23 – Replace Levels of Non-Compliance with Violation Severity Levels – NUC-001-1

The Violation Severity Level Standard Drafting Team thanks all commenters who submitted comments on Violation Severity Levels (VSLs) for Reliability Standard NUC-001-1. These VSLs were posted for an expedited 14-day public comment period from November 13–November 26, 2007. The drafting team asked stakeholders to provide feedback on the proposed VSLs through a special Comment Form. There were 8 sets of comments, including comments from 15 different people from 8 companies representing 5 of the 10 Industry Segments as shown in the table on the following pages.

The drafting team representatives revised several of the VSLs in response to stakeholder comments on the originally proposed VSLs and to conform with the modifications made to the VSL Development Guidelines based on stakeholders' comments. The revised VSLs be balloted with some of the other VSLs that were developed in response to FERC Order on VSLs.

In this "Consideration of Comments" document stakeholder comments have been organized so that it is easier to see the responses associated with each question. All comments received on the standard can be viewed in their original format at:

http://www.nerc.com/~filez/standards/VSLs_Project_2007-23.html

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, Gerry Adamski at 609-452-8060 or at gerry.adamski@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Reliability Standards Process Manual:
<http://www.nerc.com/standards/newstandardsprocess.html>.

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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

	Commenter	Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
1.	Thad K. Ness	American Electric Power	✓		✓		✓	✓						
2.	Jason Shaver	American Transmission Co.	✓											
3.	Jalil Babik	Dominion					✓							
4.	Mike Garton	Dominion					✓							
5.	Rick Nelson	Dominion					✓							
6.	Brian Westby	Dominion					✓							
7.	Will Franklin	Entergy						✓						
8.	Alessia Dawes	Hydro One Networks, Inc.	✓		✓									
9.	Ron Falsetti	IESO		✓										
10.	Alicia Daugherty	PJM Interconnection		✓										
11.	Frank Koza	PJM Interconnection		✓										
12.	Mike Bryson	PJM Interconnection		✓										
13.	Joe Willson	PJM Interconnection		✓										
14.	Leanne Harrison	PJM Interconnection		✓										
15.	Mike Gentry	Salt River Project	✓		✓		✓	✓						

Index to Questions, Comments, and Responses

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. 4
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. .. 15

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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.)

Summary Consideration: The Drafting Team appreciates the input from all commenters. The NUC-001 Drafting Team representatives (SDT) prepared the proposed VSLs to conform to the VSL Development Guidelines written by the VSL Drafting Team and in concert with the levels as developed in the NERC Board of Trustee approved NUC-001 standard. Specifically the SDT preserved the intent of the VSL assignments as developed in the BOT-approved standard but revised the VSL language for improved clarity and to be consistent with the direction of the VSL Project 2007-23. Preserving the levels as developed by the original team was important because altering them is not in the scope of this effort. The posted VSL matrix generated comments on each of the 9 requirements with suggested alternate language for select VSLs. The SDT discussed the alternate language and chose to either accept them in part or in some cases keep the team’s originally proposed language. Individual stakeholder comment responses are shown below.

Commenter	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
AEP	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
Response: The DT developed more specific and granular VSL language and opted not to adopt the generic language as provided in the revised VSL Development Guidelines.						
Entergy				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
Response: The DT agrees and modified the language of its proposed VSLs.						
PJM					The Nuclear Plant Generator Operator did provide the proposed NPIRs in writing to the applicable Transmission Entities	The Nuclear Plant Generator Operator did not provide the proposed NPIRs in writing to the applicable Transmission Entities.

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Commenter	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
					but did not verify receipt.	
<p>Response: The DT agrees and inserted the phrase "in writing" but maintained the granularity as previously proposed.</p>						
SRP						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
<p>Response: The DT agrees that a failure to provide NPIRs to applicable entities has serious reliability-related implications – but VSLs are used to identify how badly an entity complied with a requirement – VRFs assess the reliability-related risk to the BES of violating a requirement. A violation whereby the Nuclear Plant Generator Operator failed to provide its proposed NPIRs to one of four transmission entities is less severe than a violation whereby the Nuclear Plant Generator Operator failed to provide its proposed NPIRs to all four of four transmission entities.</p>						
AEP	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
<p>Response: The DT thanks the commenter for the input and has added Lower and Moderate VSLs and revised the Severe VSL to be consistent with the version of NUC-001 as approved by the NERC BOT.</p>						
Entergy			The Nuclear Plant Generator Operator or the applicable Transmission Entity does not have in effect one or more agreements that include NPIRs and documents the implementation of the NPIRs.			
<p>Response: The DT thanks the commenter for the input and has added Lower and Moderate VSLs and revised the Severe VSL to be consistent with the version of NUC-001 as approved by the NERC BOT.</p>						

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Commenter	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
PJM			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.
<p>Response: The DT thanks the commenter for the input and has added Lower and Moderate VSLs and revised the Severe VSL to be consistent with the version of NUC-001 as approved by the NERC BOT. Incorporation of NPIRs into agreements is addressed in other requirements.</p>						
AEP	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
<p>Response: The DT developed more specific VSL language and opted not to adopt the generic language in support of the revised VSL Development Guidelines which now propose that the generic language, such as "minor details" and "significant details" be replaced with specific details of what constitutes "minor" or "significant". The DT has reworded the High VSL and added a Severe VSL to meet the intent and be consistent with the VSL section of the BOT approved standard. The BOT approved standard calls for a High VSL when any one requirement among R3 through R8 has not been completely met. The BOT approved standard also calls for a Severe VSL when none of the requirements R3 through R8 have been completely implemented by either the applicable Transmission Entity or Nuclear Plant Generator Operator.</p>						
PJM					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
<p>Response: The DT thanks the commenter for the input and has reworded the High VSL and added a Severe VSL to meet the intent and be consistent with the VSL section of the BOT approved standard. The BOT approved standard calls for a High VSL when any one requirement among R3 through R8 has not</p>						

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<p>been completely met. The BOT approved standard also calls for a Severe VSL when none of the requirements R3 through R8 have been completely implemented by either the applicable Transmission Entity or Nuclear Plant Generator Operator.</p>						
AEP	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
<p>Response: The DT thanks the commenter for the input and has reworded the Lower, Moderate and High VSLs to be more specific and added a Severe VSL to meet the intent and be consistent with the VSL section of the BOT approved standard. The BOT approved standard calls for a High VSL when any one requirement among R3 through R8 has not been completely met. The BOT approved standard also calls for a Severe VSL when none of the requirements R3 through R8 have been completely implemented by either the applicable Transmission Entity or Nuclear Plant Generator Operator.</p>						
ATC			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.	
<p>Response: The DT thanks the commenter for the input and has reworded the Lower, Moderate and High VSLs to be more specific and added a Severe VSL to meet the intent and be consistent with the VSL section of the BOT approved standard. The BOT approved standard calls for a High VSL when any one requirement among R3 through R8 has not been completely met. The BOT approved standard also calls for a Severe VSL when none of the requirements R3 through R8 have been completely implemented by either the applicable Transmission Entity or Nuclear Plant Generator Operator.</p>						
Dominion					<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"> incorporate the NPIRs into operating analyses 	

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Commenter	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
					<ul style="list-style-type: none"> operate the electric system to meet NPIRs inform the Nuclear Plant Generator Operator when the ability to assess the operation of the electric system affecting NPIRs is lost. 	
<p>Response: The DT thanks the commenter for the input and has reworded the Lower, Moderate and High VSLs to be more specific and added a Severe VSL to meet the intent and be consistent with the VSL section of the BOT approved standard. The BOT approved standard calls for a High VSL when any one requirement among R3 through R8 has not been completely met. The BOT approved standard also calls for a Severe VSL when none of the requirements R3 through R8 have been completely implemented by either the applicable Transmission Entity or Nuclear Plant Generator Operator.</p>						
PJM				<p>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 Plan Generator Operator when the ability to assess the operation of the electric system affecting NPIRs is lost.</p>	<p>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.</p>	<p>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.</p>
<p>Response: The DT thanks the commenter for the input and has reworded the Lower, Moderate and High VSLs to be more specific and added a Severe VSL to meet the intent and be consistent with the VSL section of the BOT approved standard. The BOT approved standard calls for a High VSL when any one requirement among R3 through R8 has not been completely met. The BOT approved standard also calls for a Severe VSL when none of the requirements R3 through R8 have been completely implemented by either the applicable Transmission Entity or Nuclear Plant Generator Operator.</p>						

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Commenter	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
AEP	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
<p>Response: The DT thanks the commenter for the input and has reworded the Lower, Moderate and High VSLs to be more specific and added a Severe VSL to meet the intent and be consistent with the VSL section of the BOT approved standard. The BOT approved standard calls for a High VSL when any one requirement among R3 through R8 has not been completely met. The BOT approved standard also calls for a Severe VSL when none of the requirements R3 through R8 have been completely implemented by either the applicable Transmission Entity or Nuclear Plant Generator Operator.</p>						
ATC			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.	
<p>Response: The DT developed more specific VSL language that identifies what are "minor" or "major" items. The DT has reworded the Lower, Moderate and High VSLs to be more specific and added a Severe VSL to meet the intent and be consistent with the VSL section of the BOT approved standard. The BOT approved standard calls for a High VSL when any one requirement among R3 through R8 has not been completely met. The BOT approved standard also calls for a Severe VSL when none of the requirements R3 through R8 have been completely implemented by either the applicable Transmission Entity or Nuclear Plant Generator Operator.</p>						
Dominion					The Nuclear Plant Generator Operator did not operate the plant with respect to more than one significant element within the agreements	
<p>Response: The DT developed more specific VSL language and opted not to adopt the generic language in support of the revised VSL Development Guidelines which now propose that the generic language, such "significant elements" be replaced with specific details. The DT has reworded the Lower, Moderate and High VSLs to be more specific and added a Severe VSL to meet the intent and be consistent with the VSL section of the BOT approved standard. The BOT approved standard calls for a High VSL when any one requirement among R3 through R8 has not been completely met. The BOT approved standard also calls for a Severe VSL when none of the requirements R3 through R8 have been completely implemented by either the applicable Transmission Entity or Nuclear Plant Generator Operator.</p>						

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Committer	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
PJM			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.
<p>Response: The DT developed more specific VSL language and opted not to adopt generic criteria in support of the revised VSL Development Guidelines which now propose that the generic language, such as "minor details" and "significant details" be replaced with specific details. The DT has reworded the Lower, Moderate and High VSLs to be more specific and added a Severe VSL to meet the intent and be consistent with the VSL section of the BOT approved standard. The BOT approved standard calls for a High VSL when any one requirement among R3 through R8 has not been completely met. The BOT approved standard also calls for a Severe VSL when none of the requirements R3 through R8 have been completely implemented by either the applicable Transmission Entity or Nuclear Plant Generator Operator.</p>						
AEP	NUC-001-1	R6.	The responsible entity's coordination/communication is non-compliant with respect to one or more minor details within the requirement.	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 requirement.	N/A
<p>Response: The DT developed more specific VSL language and opted not to adopt generic criteria in support of the revised VSL Development Guidelines which now propose that the generic language, such as "minor details" and "significant details" be replaced with specific details. The DT has reworded the Lower and Moderate VSLs to be more specific and added a Severe VSL to meet the intent and be consistent with the VSL section of the BOT approved standard. The BOT approved standard calls for a High VSL when any one requirement among R3 through R8 has not been completely met. The BOT approved standard also calls for a Severe VSL when none of the requirements R3 through R8 have been completely implemented by either the applicable Transmission Entity or Nuclear Plant Generator Operator.</p>						
PJM						The entity did not coordinate outages and maintenance activities which affect the NPIRs.
<p>Response: The DT developed more specific VSL language and opted not to adopt generic criteria in support of the revised VSL Development Guidelines which now propose that the generic language, such as "minor details" and "significant details" be replaced with specific details. The DT has reworded the Lower and Moderate VSLs to be more specific and added a Severe VSL to meet the intent and be consistent with the VSL section of the BOT approved standard. The BOT approved standard calls for a High VSL when any one requirement among R3 through R8 has not been completely met. The BOT approved standard also calls for a Severe VSL when none of the requirements R3 through R8 have been completely implemented by either the applicable</p>						

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Commenter	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
Transmission Entity or Nuclear Plant Generator Operator.						
AEP	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
<p>Response: The DT developed more specific VSL language and opted not to adopt generic criteria in support of the revised VSL Development Guidelines which now propose that the generic language, such as "minor details" and "significant details" be replaced with specific details. The DT has reworded the Lower, Moderate and High VSLs and added a Severe VSL to meet the intent and be consistent with the VSL section of the BOT approved standard. The BOT approved standard calls for a High VSL when any one requirement among R3 through R8 has not been completely met. The BOT approved standard also calls for a Severe VSL when none of the requirements R3 through R8 have been completely implemented by either the applicable Transmission Entity or Nuclear Plant Generator Operator.</p>						
Dominion			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.
<p>Response: The DT developed more specific VSL language and opted not to adopt generic criteria in support of the revised VSL Development Guidelines which now propose that the generic language, such as "minor details" and "significant details" be replaced with specific details . The DT has reworded the Lower, Moderate and High VSLs and added a Severe VSL to meet the intent and be consistent with the VSL section of the BOT approved standard. The BOT approved standard calls for a High VSL when any one requirement among R3 through R8 has not been completely met. The BOT approved standard also calls for a Severe VSL when none of the requirements R3 through R8 have been completely implemented by either the applicable Transmission Entity</p>						

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Commenter	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
or Nuclear Plant Generator Operator.						
PJM			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
<p>Response: The DT developed more specific VSL language and opted not to adopt generic criteria in support of the <u>revised</u> VSL Development Guidelines which now propose that the generic language, such as “minor details” and “significant details” be replaced with specific details. The DT has reworded the Lower, Moderate and High VSLs and added a Severe VSL to meet the intent and be consistent with the VSL section of the BOT approved standard. The BOT approved standard calls for a High VSL when any one requirement among R3 through R8 has not been completely met. The BOT approved standard also calls for a Severe VSL when none of the requirements R3 through R8 have been completely implemented by either the applicable Transmission Entity or Nuclear Plant Generator Operator.</p>						
AEP	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
<p>Response: The DT developed more specific VSL language and opted not to adopt generic criteria in support of the <u>revised</u> VSL Development Guidelines which now propose that the generic language, such as “minor details” and “significant details” be replaced with specific details. The DT has reworded the Lower, Moderate and High VSLs and added a Severe VSL to meet the intent and be consistent with the VSL section of the BOT approved standard. The BOT approved standard calls for a High VSL when any one requirement among R3 through R8 has not been completely met. The BOT approved standard also calls for a Severe VSL when none of the requirements R3 through R8 have been completely implemented by either the applicable Transmission Entity or Nuclear Plant Generator Operator.</p>						

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Commenter	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
Dominion			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.
<p>Response: The DT developed more specific VSL language and opted not to adopt generic criteria in support of the <u>revised</u> VSL Development Guidelines which now propose that the generic language, such as “minor details” and “significant details” be replaced with specific details. The DT has reworded the Lower, Moderate and High VSLs and added a Severe VSL to meet the intent and be consistent with the VSL section of the BOT approved standard. The BOT approved standard calls for a High VSL when any one requirement among R3 through R8 has not been completely met. The BOT approved standard also calls for a Severe VSL when none of the requirements R3 through R8 have been completely implemented by either the applicable Transmission Entity or Nuclear Plant Generator Operator.</p>						
AEP	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
<p>Response: The DT elected to categorize this requirement as Multi-Component. The DT sub-divided and ranked the elements contained in R9 to arrive at four levels of violation severity. The DT developed the 4 proposed VSLs to distinguish between less critical and more critical elements of R9, then ranked and slotted them in order of criticality and breadth of non-compliance. The BOT approved standard explicitly calls for a Moderate VSL when Agreement(s) exist per R2 and NPIRs were identified and implemented, but one or more elements of the Agreement in R9 were not met. The DT chose to add grades of severity around this Moderate VSL criterion.</p>						
ATC			Is this VSL stating that each sub-requirement has to be addressed in the NPIR even if that sub-requirement does	Is this VSL stating that each sub-requirement has to be addressed in the NPIR even if that sub-requirement does	Is this VSL stating that each sub-requirement has to be addressed in the	Is this VSL stating that each sub-requirement has to be addressed in the NPIR even if that

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Commenter	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			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 as not-applicable in its agreement count as satisfying the VSL term "identified"?	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 as not-applicable in its agreement count as satisfying the VSL term "identified"?	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 as not-applicable in its agreement count as satisfying the VSL term "identified"?	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 as not-applicable in its agreement count as satisfying the VSL term "identified"?
<p>Response: The DT thanks the commenter for the question. The sub-requirements that apply to the entity are considered for compliance. Each sub-requirement must be addressed in some agreement(s) between each nuclear plant and the aggregate of all associated transmission entities, but each separate agreement may not need to address all of the sub-requirements.</p>						
PJM			The agreement between the Nuclear Plant Generator Operator and the applicable Transmission Entities did not contain one or more of the required administrative elements.	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 elements, or communications and training elements.	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 elements, or communications and training elements.	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 elements, or communications and training elements.
<p>Response: The DT thanks the commenter for the input but believes the commenter’s recommendation and the DT’s proposed VSLs are essentially equivalent.</p>						

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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.

Summary Consideration: The Drafting Team appreciates the input from all commenters. One comment is directed at the technical content of the standard itself and the DT did not consider the comment since it is beyond the scope of this team. The DT considered all other comments and the individual responses are shown below.

Commenter	Comment
Dominion	<ol style="list-style-type: none"> 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.
<p>Response:</p> <ol style="list-style-type: none"> 1. The DT thanks the commenter for the input however the DT wanted to remain as consistent as possible with the VSLs in the version of NUC-001 as approved by the NERC BOT while meeting the intent of the VSL Development Guidelines. The BOT approved standard calls for a High VSL when any one requirement among R3 through R8 has not been completely met. 2. The DT thanks the commenter for the input however the DT wanted to remain as consistent as possible with the VSLs in the version of NUC-001 as approved by the NERC BOT while meeting the intent of the VSL Development Guidelines. The BOT approved standard calls for a High VSL when any one requirement among R3 through R8 has not been completely met. 3. The DT thanks the commenter for the input. The VSL Development Guidelines do not require that all 4 levels be assigned and indeed it may be appropriate to limit the levels to less than four in some cases. The DT has revised R3 though R8 to include a Severe VSL per the BOT approved standard’s intent. 4. The term “proposed” is a part of the standard requirement as approved by the NERC BOT and we cannot alter it through this VSL project. We encourage the commenter to submit a SAR to address the issue. 	
Hydro One	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.
<p>Response: The DT thanks the commenter for the input and has reworded these VSLs consistent with revisions currently underway for the VSL Development Guidelines. The revised VSLs include examples of what constitutes a “minor” or a “significant” NPIR element.</p>	
IESO	The IESO is in general agreement with the VSLs that have been assigned to the NUC-001 standard. We would also

Consideration of Comments on Supplement to Project 2007-23 – Replace Levels of Non-Compliance with Violation Severity Levels – NUC-001-1

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	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.
<p>Response: The VRFs are assigned by the specific Standard Drafting Teams based on the potential adverse impact on the reliability of the BPS if an entity failed to meet the requirement. The VSLs are established independent of the VRFs and are used to assess the magnitude of non-compliance once a violation has been identified.</p>	
PJM	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.
<p>Response: Thank you for the input.</p>	
SRP	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.
<p>Response: The DT thanks the commenter for raising the issue, however we believe this is a compliance and registration issue. The DT's goal is to assign VSLs and not to assess compliance in specific circumstances. We suggest the commenter bring this issue to the attention of the Compliance Program and/or the CCC.</p>	
AEP	No comment.
ATC	No comment.
Entergy	No comment.