

**Individual or group. (29 Responses)**

**Name (15 Responses)**

**Organization (15 Responses)**

**Group Name (14 Responses)**

**Lead Contact (14 Responses)**

**Contact Organization (14 Responses)**

**IF YOU WISH TO EXPRESS SUPPORT FOR ANOTHER ENTITY'S COMMENTS WITHOUT ENTERING ANY ADDITIONAL COMMENTS, YOU MAY DO SO HERE. (2 Responses)**

**Comments (29 Responses)**

**Question 1 (26 Responses)**

**Question 1 Comments (27 Responses)**

**Question 2 (26 Responses)**

**Question 2 Comments (27 Responses)**

**Question 3 (26 Responses)**

**Question 3 Comments (27 Responses)**

**Question 4 (14 Responses)**

**Question 4 Comments (14 Responses)**

Group
Northeast Power Coordinating Council
Guy Zito
Northeast Power Coordinating Council
Yes
Real-time Operations should be added to the Time Horizon for R5 so as to be consistent with those stipulated for R4 (which is applicable to the Transmission Entities). In Section D. Regional Variances, add the words "and nuclear plant safe operation" as follows: Canadian Nuclear Plant Licensing Requirements (CNPLR) are requirements included in the design basis of the nuclear plant and are statutorily mandated for the operation of the plant; when used in this standard, NPLR shall mean nuclear power plant licensing requirements for avoiding preventable challenges to nuclear safety and nuclear plant safe operation as a result of an electric system disturbance, transient, or condition.
Group

Florida Power & Light
Mike O'Neil
Florida Power & Light
Yes
Yes
Yes
Group
Arizona Public Service Company
Janet Smith
Arizona Public Service Company
Yes
Yes
Yes
Group
FirstEnergy Corp
Cindy Stewart
FirstEnergy Corp
Yes
Yes
ADDITIONAL COMMENTS: FirstEnergy acknowledges that Part 9.1 was retired under the Paragraph 81 project. We also agree with not renumbering Requirement parts that would impact existing agreements throughout the industry. However, we strongly suggest that Part 9.1 be marked Retired instead of being left blank as this could lead to future confusion. Our concern is that someone not aware of the history of NUC-001 may do unnecessary research to understand why Part 9.1 is blank. Stating "Retired" will provide clarity and eliminate the possibility of any confusion.
Yes

Individual
Andrew Z. Puztai
American Transmission Company, LLC
Yes
Agree.
Yes
Agree
Yes
Group
Dominion
Mike Garton
Dominion Resources Services, Inc.
Yes
Dominion agrees with the changes to R5, but suggests M5 be updated; where 'Nuclear Power Plant' is used, change this to 'nuclear power plant' (lower case), as this is not a defined term. Also in section D - Regional Variances - Nuclear Power Plant is also capitalized here and it should not be capitalized and suggest changing this to 'nuclear power plant'.
Yes
No
Dominion does not see how the VSLs in R6 can have N/A under Severe. According to the last sentence on page 2 of the VSL guideline and combine that with the chart at the top of the page, it seems that failure to coordinate one or more outages or maintenance activities which affect the NPIRs, indicates that the entity failed to meet the performance of the requirement. Therefore Dominion suggests that the VSL currently marked High be changed to Severe. Question 4 Comments: 1. The impact identified in Requirement R8 does not match the impact identified in Measure M8 . Specifically, R8 "impact the ability of the electric system to meet the NPIRs" while M8 "impact the ability of the Nuclear Plant Generator Operator to meet the NPIRs." Dominion believes the language in M8 is correct and suggest revising R8 accordingly. 2. The Data Retention section addresses Measure M4.3 but does not address M4.1 or M4.2. 3. Requirements R7 and R8 uses the term 'may impact the ability of the electric system' and the M7 and M8 uses the term 'would impact the ability of the electric system'. Dominion suggests that the SDT replace 'may' with 'will' in requirements R7 and R8, or delete both "may" and "would" and simply use present tense "impact" in the Requirements and past tense "impacted" in the Measures.
Individual
Tammy Porter

Oncor Electric Delivery
Yes
Yes
Yes
Individual
David Thorne
Pepco Holdings Inc.
Yes
Yes
Yes
Individual
Leonard Kula
Independent Electricity System Operator
Yes
Yes
Yes
Question 4: Additional Comments Provided a. R3 as written has a very broad scope and mandate for the Transmission Entities as it implies that the Transmission Entities need to communication the results of all planning analyses that have NPIRs incorporated, either as assumption or in the model, to the Nuclear Plant Generator Operator (NPGO), regardless of the potential impacts on the NPGO. This is unnecessary, and the amount of information provided to the NPGO can be overwhelming. We suggest revising R3 as follows: R3. Per the Agreements developed in accordance with this standard, the applicable Transmission Entities shall incorporate the NPIRs into their planning analyses of the electric system and shall communicate the analysis results to those Nuclear Plant Generator Operators that may be affected by such results. With the proposed revision, the Transmission Entities do not have to communicate the results of all analyses that have NPIRs incorporated, and the NPGO will not be inundate by analysis results that do not affect them. b. Real-time Opertions should be

added to the Time Horizon for R5 so as to be consistent with those stipulated for R4 (which is applicable to the Transmission Entities). c. The MEDIUM VRF for R1 stipulated in the VSL should be LOWER, not MEDIUM as it is inconsistent with the LOWER VRF stipulated in the requirement itself.

Individual

Don Schmit

Nebraska Public Power District

No

We recommend that R5 revert back to version 2 wording as follows: “R5 - The Nuclear Plant Generator Operator shall operate per the Agreements developed in accordance with this standard.” (The reason for reversion back to the version 2 R5 is identified in our comments in #4 below.) We would also recommend that the Time Horizon change for R5 to match R4 [Operations Planning and Real-time Operations]. Since Q4 from the draft comment form does not show up on this Official comment site we are including Q4 (any other comments) here: The Glossary of Terms for the definition of NPIRs [Nuclear Plant Interface Requirements] needs revision (along with our other Standard revisions noted in comments above) in order for version 3 of NUC-001 to capture the requirements put upon the Nuclear Plant Operator for operation of the nuclear plant; and the requirements placed upon the Nuclear Plant Operator and the Transmission Entity for interface requirements between the two based upon the NPLR’s. NPLR’s or Nuclear Plant Licensing Requirements are the license requirements that the Nuclear Plant Operator must operate to [the Nuclear Plant Operator does not operate to the NPIR’s as suggested under R5]. The NPIR’s are indeed the mutually agreed upon requirements between the Nuclear Plant Operator and the Transmission Entity that are based upon the NPLR’s. The NPIR’s are not Bulk Electric System (BES) requirements “mutually” agreed upon between the Nuclear Plant Operator and the Transmission Entity as suggested by the current definition of NPIR. BES requirements are applicable to the Nuclear Plant Operator as a Generator Owner under other NERC Standards and Requirements and are not “mutually agreeable” between the two entities. In alignment with the stated Purpose of this Standard, NPPD suggests that the definition of NPIR be changed to “The requirements based on NPLR’s that have been mutually agreed to by the Nuclear Plant Operator and the applicable Transmission Entities to ensure nuclear plant safe operation and shutdown”. Please note that the definition of NPLR (as referenced in the NPIR proposed definition) already has the applicable parameters [plant design basis and statutorily mandated for operation; and including off-site power supply and avoiding preventable challenges to nuclear safety as a result of electric system disturbance, transient, or condition]. When the NPIR’s are agreed upon between the Nuclear Plant Operator and the Transmission Entity then they both operate to the Agreements between the two. R4 is correct in stating that the Transmission Entity application shall be “per the Agreement”. Likewise R5 should require the Nuclear Plant Operator to follow the Agreements as agreed to (see comment changes in #1 above) for R5; which we state that R5 should revert back to version 2 language.

Yes

No
Change the VSL for R5 based on our comments in #1 and #4. Change the reference to “NPIRs” in this VSL to “Agreement’s”. R9 VSL’s: Please revert back to version 2 VSL’s for R9. A percentage basis as used in version 3 will lead to improper application by regulators. Version 2 is a much cleaner approach.
Individual
Ayesha Sabouba
Hydro One
Agree
NPCC-RSC
Group
SERC OC Review Group
Jim Porter
TVA
Yes
The SERC OC Review Group recommends that M5 be updated to use the term “nuclear power plant” (without capitalization) instead of “Nuclear Power Plant” as this is not a defined term. Current M5 language: The Nuclear Plant Generator Operator shall, upon request of the Compliance Enforcement Authority, demonstrate or provide evidence that the Nuclear Power Plant is being operated consistent with the NPIRs. Proposed M5 language: The Nuclear Plant Generator Operator shall, upon request of the Compliance Enforcement Authority, demonstrate or provide evidence that the nuclear power plant is being operated consistent with the NPIRs. If this change is acceptable then R1 VSL Severe is recommended for modification for consistency. Current R1 VSL Severe language: The Nuclear Plant Generator Operator did not provide the proposed NPIR's to more than two of applicable entities. OR For a particular Nuclear Power Plant, if the number of possible applicable transmission entities is equal to the number of applicable transmission entities not provided NPIRs Proposed R1 VSL Severe language: The Nuclear Plant Generator Operator did not provide the proposed NPIR's to more than two of applicable entities. OR For a particular nuclear power plant, if the number of possible applicable transmission entities is equal to the number of applicable transmission entities not provided NPIRs
Yes
No
The SERC OC Review Team requests clarification as to why the SDT chose to use the “high” VSL category and not the “severe” VSL category. Using the VSL guideline (page 2 last sentence) it appears that failure to coordinate one or more outages or maintenance activities which affect the NPIRs indicates that the entity failed to meet the performance of the requirement. Thus, it may be appropriate that the “severe” VSL should be utilized. Software

did not allow access to Question 4. Please see additional comments below. The SERC OC Review Team respectfully requests clarification on the use of “may” vs. “would” in R7 and M7. The same clarification is requested for R8 and M7. The concern is the interpretation that is used for “may” and “would”. An example is included below: R7. Per the Agreements developed in accordance with this standard, the Nuclear Plant Generator Operator shall inform the applicable Transmission Entities of actual or proposed changes to nuclear plant design (e.g., protective relay setpoints), configuration, operations, limits, or capabilities that may impact the ability of the electric system to meet the NPIRs. [Violation Risk Factor: High] [Time Horizon: Long-term Planning] M7. The Nuclear Plant Generator Operator shall provide evidence that it informed the applicable Transmission Entities of changes to nuclear plant design (e.g., protective relay setpoints), configuration, operations, limits, or capabilities that would impact the ability of the Transmission Entities to meet the NPIRs. Data Retention: The SERC OC Review Group noticed that M4.1 and M4.2 are not included in the Data Retention section. It is requested that the SDT review and evaluate whether or not M4.1 and M4.2 should be included in the Data Retention section. The comments expressed herein represent a consensus of the views of the above named members of the SERC OC Review Group only and should not be construed as the position of the SERC Reliability Corporation, or its board or its officers.

Individual

Joshua Andersen

Salt River Project

Yes

Yes

Yes

Individual

Anthony Jablonski

ReliabilityFirst

No

ReliabilityFirst submits the following comments for consideration (question 4 was missing from the online form so we submitted it here): Requirement R7 and R8 – Without the terms “nuclear plant design” or “electric system design” being defined in the standard, ReliabilityFirst believes the original intent of requiring the entity to inform the Transmission Entities of changes to the Protection System may be getting lost. The original standard required information regarding changes to Protection Systems and ReliabilityFirst requests the justification for no longer requiring elements such as Protective relays, communications

systems, voltage and current sensing devices, station dc supply and control circuitry be included as being reportable to the Transmission Entities in the standard.

No

ReliabilityFirst submits the following comments for consideration: Requirement R9 – Even though the intent of Requirement R9 is understood, ReliabilityFirst believes it can be stated in a more clear and concise manner. ReliabilityFirst recommends the following for consideration: “The Nuclear Plant Generator Operator and the applicable Transmission Entities shall include the following elements in aggregate within the Agreement(s) identified in R2. Regardless if there are single or multiple Agreements with single or multiple Transmission Entities, all elements under Requirement R9 need to be addressed, in aggregate, within the Agreement(s)”

No

ReliabilityFirst submits the following comments for consideration: VSL for Requirement R4 – For consistency, all VSLs under Requirement R4 should reference “sub-parts” and not “sub-requirements”. VSL for Requirement R6 – For consistency with the language in Requirement R6, the Moderate VSL should reference “maintenance activities” and not “maintenance schedules”.

Individual

Thomas Foltz

American Electric Power

Yes

Yes

No

The correct pluralization of NPIR is “NPIRs”, without an apostrophe. There are a number of instances in the VSL table where an apostrophe is incorrectly used.

Individual

Robert Coughlin

ISO New England Inc.

Yes

ISO-NE suggests that the SDT clarify the definition of Nuclear Plant Interface Requirements (NPIRs). Adding a second sentence to the definition would help to avoid inappropriate identification of NPIRs. 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. NPIRs reflect limits, parameters, equipment configuration control or administrative tasks associated with maintaining the NPLRs or BES requirements. Rationale: As currently defined, NPIRs are tied to both Nuclear Plant License Requirements (NPLRs) and Bulk Electric System (BES) requirements. NPLRs and BES requirements are each typically expressed as measurable values, specified facilities, or specified equipment configurations. NPLRs are defined by the Nuclear Regulatory Commission (NRC) through the 10 CFR Part 50 process (Domestic Licensing of "Production and Utilization Facilities"), which defines the requirements for the licensing of nuclear power plants in the United States. From these requirements, design basis scenarios are created to identify limits, parameters or configuration control (e.g., minimum number of lines to the station) that must be met to operate/maintain the plant within the license requirements. NPLRs could also include administrative tasks required by the NRC, also expressed in terms of a measurable value (e.g. certain studies must be reviewed on a prescribed timeframe). BES requirements are also typically expressed as values (e.g., transmission system limit). This clarification would help to avoid inappropriate identification of actions to address and implement a NPIR as a NPIR itself. Actions to address and implement a NPIR are required by NUC-001-3 R2, but those actions should not be identified as NPIRs themselves because they are not directly related to either licensing requirements or BES requirements.

Individual

Chris Scanlon

Exelon Corporation

Yes

Yes

Yes

No

Group

Florida Municipal Power Agency

Frank Gaffney

Florida Municipal Power Agency

Yes

Yes

Yes
Yes
FMPA suggests that Applicability Section 4.2.9 Load Serving Entity should be removed from the list. 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." FMPA 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.
Individual
Bob Thomas
Illinois Municipal Electric Agency
Agree
Florida Municipal Power Agency
Individual
RoLynda Shumpert
South Carolina Electric and Gas
Yes
Yes
Yes
No
Group
Southern Company: Southern Company Services, Inc.; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing
Marcus Pelt
Southern Company Operations Compliance
Yes
Yes

Yes
No
Individual
David Ramkalawan
OPG
Yes
In section D. Regional Variances, OPG would like to add the words “and nuclear plant safe operation” as follows: Canadian Nuclear Plant Licensing Requirements (CNPLR) are requirements included in the design basis of the nuclear plant and are statutorily mandated for the operation of the plant; when used in this standard, NPLR shall mean nuclear power plant licensing requirements for avoiding preventable challenges to nuclear safety and nuclear plant safe operation as a result of an electric system disturbance, transient, or condition.
Group
Tennessee Valley Authority
Brandy Spraker
NERC Regulatory Compliance
Yes
Recommend to follow the SERC OC comment that M5 be updated to use the term “nuclear power plant” (without capitalization) instead of “Nuclear Power Plant” as this is not a defined term. Current M5 language: The Nuclear Plant Generator Operator shall, upon request of the Compliance Enforcement Authority, demonstrate or provide evidence that the Nuclear Power Plant is being operated consistent with the NPIRs. Proposed M5 language: The Nuclear Plant Generator Operator shall, upon request of the Compliance Enforcement Authority, demonstrate or provide evidence that the nuclear power plant is being operated consistent with the NPIRs. If this change is acceptable then R1 VSL Severe is recommended for modification for consistency. Current R1 VSL Severe language: The Nuclear Plant Generator Operator did not provide the proposed NPIR's to more than two of applicable entities. OR For a particular Nuclear Power Plant, if the number of possible applicable transmission entities is equal to the number of applicable transmission entities not provided NPIRs Proposed R1 VSL

Severe language: The Nuclear Plant Generator Operator did not provide the proposed NPIR's to more than two of applicable entities. OR For a particular nuclear power plant, if the number of possible applicable transmission entities is equal to the number of applicable transmission entities not provided NPIRs
Yes
Yes
Yes
Recommend to follow the SERC OC comments following: The SERC OC Review Team respectfully requests clarification on the use of “may” vs. “would” in R7 and M7. The same clarification is requested for R8 and M7. The concern is the interpretation that is used for “may” and “would”. An example is included below: R7. Per the Agreements developed in accordance with this standard, the Nuclear Plant Generator Operator shall inform the applicable Transmission Entities of actual or proposed changes to nuclear plant design (e.g., protective relay setpoints), configuration, operations, limits, or capabilities that may impact the ability of the electric system to meet the NPIRs. [Violation Risk Factor: High] [Time Horizon: Long-term Planning] M7. The Nuclear Plant Generator Operator shall provide evidence that it informed the applicable Transmission Entities of changes to nuclear plant design (e.g., protective relay setpoints), configuration, operations, limits, or capabilities that would impact the ability of the Transmission Entities to meet the NPIRs. Data Retention: The SERC OC Review Group noticed that M4.1 and M4.2 are not included in the Data Retention section. It is requested that the SDT review and evaluate whether or not M4.1 and M4.2 should be included in the Data Retention section.
Group
ACES Standards Collaborators
Brian Van Gheem
ACES
Yes
We commend the NUC Five-Year Review Team for this recommendation and the SDT with its implementation to revise R5 and make it consistent with R4. Following this revision, Nuclear Plant Generator Operators will be obligated to operate their nuclear plants in a manner to meet the NPIRs, which will address possible reliability concerns that result when operations are outside of these requirements.
Yes
We commend the NUC Five-Year Review Team for this recommendation and the SDT with its implementation to revise R9. This clarification allows entities to address the elements of Requirement R9 across several agreements and not limit them to just one.
No

We believe the VRFs identified for requirements R5 and R9 are appropriate for their level of impact to the BES. However, we do have concerns regarding the VSLs for these requirements. The VSL for Requirement R5 is binary in nature and should be modified to a graduated severity level. We feel that weighing each NPIR equally does not identify the significance of some NPIRs, such as power supply restoration times and safety. We also find the percentage approach taken for R9 confusing and that the previous approach identifying a specific number of elements easier.

Yes

(1) We appreciate the SDT with their efforts to incorporate the various recommendations from the NUC Five-Year Review Team in this revision of NERC Standard NUC-001. In particular, we welcome the clarification in Requirement R5 regarding nuclear plant operations meeting the NPIRs. We also welcome the omission of the NERC Glossary Term "Protection Systems" from requirements R7 and R8 to better identify the intent of those requirements. Finally, we welcome the administrative details taken to identify appropriate timing horizons, clarify measures, and modify the VSLs and VRFs. (2) However, we feel that further revision is still needed. We feel a communication gap exists when Nuclear Plant Generator Operators neglect to communicate with Transmission Entities when Nuclear Plant Generator Operators lose the ability to assess the operation of their plants and ability to meet the NPIRs. We believe addressing this gap will be a step towards situational awareness for all affected Parties involved. (3) We feel the number of elements listed under Requirement R9 should be limited to those elements affecting the NPIRs. For example, Requirement R9.3.3 identifies a need for coordination of testing, calibration, and maintenance of power supplies within the aggregated agreements. While we agree with the importance of testing, calibrating, and maintaining power supplies, we believe such activities are already addressed by the owner of such facilities through other NERC Standards. Likewise, Requirement R9.3.6 identifies the coordination of physical and cyber security protection of assets near the nuclear plant interface. While we agree with the importance of physical and cyber security protection, we believe such activities are already addressed with existing NERC Critical Infrastructure Protection requirements. Moreover, these activities will be further enhanced with Revision 5 of these NERC Critical Infrastructure Protection standards. (4) Finally, we thank you for the opportunity to comment.

Group

Duke Energy

Colby Bellville

Duke Energy

Yes

Duke Energy agrees with the revisions made by the SDT.

Yes

Duke Energy agrees with the revisions made by the SDT.

Yes

No
Group
DTE Electric
Kathleen Black
NERC Training & Standards Development
Yes
Yes
Yes
There is a question as to why R5's VRF and VSL are called out. The VRF remains at High and the VSL is High for the NPGOP to operate to the NPIRs.
No
Individual
Catherine Wesley
PJM Interconnection
Yes
PJM has also signed onto the SRC's comments.
Group
ISO/RTO Council Standards Review Committee
Greg Campoli
NYISO
Yes
Yes
Yes

Yes

a. Measure M2 is unclear: M2. The Nuclear Plant Generator Operator and each Transmission Entity shall each have a copy of the Agreement(s) [addressing and implementing the NPIRs] available for inspection upon request of the Compliance Enforcement Authority. The Agreement doesn't "address and implement" the NPIRs – it describes how the entities address and implement them. The measure should simply state that the responsible entity has a copy of the agreement – i.e. we suggest to delete the language in [bracket]. b. R3 as written has a very broad scope and mandate for the Transmission Entities as it implies that the Transmission Entities need to communicate the results of all planning analyses that have NPIRs incorporated, either as an assumption or in the model, to the Nuclear Plant Generator Operator (NPGO) regardless of the potential impacts on the NPGO. This is unnecessary, and the amount of information provided to the NPGO can be overwhelming. We suggest revising R3 as follows: R3. Per the Agreements developed in accordance with this standard, the applicable Transmission Entities shall incorporate the NPIRs into their planning analyses of the electric system and shall communicate those analysis results that affect the relevant Nuclear Plant Generator Operators that may be affected by such results. With the proposed revision, there will not be a suggestion that Transmission Entities have to communicate the results of all analyses that have NPIRs incorporated, and the NPGO will not be inundated by analysis results that do not affect them. c. Requirement R4: There appears to be an inconsistency between R4 and Measure M4 which has created some confusion in assessing compliance. It is our understanding that most Agreements between Nuclear Plant Generator Operators and Transmission Entities include specific tasks/actions that both parties need to perform. Hence, each Transmission Entity has specific tasks assigned but is not held responsible for all aspects of a plant's NPIRs or those performed by other Transmission Entities associated with that plant. To ensure the Transmission Entity is assessed only on its specific tasks per the Agreement, we suggest to delete the word "current" from Measure M4.1, and add "per the Agreements" to Measures M4.2 and M4.3, as follows: M4. Each Transmission Entity responsible for operating the electric system in accordance with the Agreement shall demonstrate or provide evidence of the following, upon request of the Compliance Enforcement Authority: M4.1: The NPIRs have been incorporated into the current operating analysis of the electric system. (Requirement 4.1) requirement R4 does not specify "current", and one may not know what this means, which can be current as at the day of the audit. We suggest deleting the word "current". M4.2 The electric system was operated to meet the NPIRs per the agreements. (Requirement 4.2) M4.3 The Transmission Entity informed the Nuclear Plant Generator Operator when it became aware it lost the capability to assess the operation of the electric system affecting the NPIRs per the agreements. d. Real-time Operations should be added to the Time Horizon for R5 so as to be consistent with those stipulated for R4 (which is applicable to the Transmission Entities). e. Requirements R1, R2, R3, R7, R8, and R9 specify the Time Horizon as "Long-term Planning", which differs somewhat from the NERC Glossary defined term of "Long-Term Transmission Planning Horizon", which NERC defines as covering years 6 – 10 and beyond. We suggest adding "Near-Term Planning" to the Time Horizon, which NERC defines as covering years 1 – 5. With the Near-Term Planning and Long-Term Planning included in the Time Horizon, the one to ten year planning

horizon would be covered. This is particularly relevant to Requirements R3 and R9 (i.e., R9.2.3) where they are specific to planning analyses. Similarly, it's relevant to Requirement R8, where the analysis to identify system changes to the electric system should include year's 1 - 5 in the planning horizon and planning analyses. f. The MEDIUM VRF for R1 stipulated in the VSL should be LOWER, not MEDIUM as it is inconsistent with the LOWER VRF stipulated in the requirement itself.

Group

Bonneville Power Administration

Andrea Jessup

Transmission Reliability Standards Group

Yes

BPA concurs the NPIRS should drive the interface requirements; however NPIRS must be concurred between transmission provider and nuclear plant prior to inclusion in an Interface Agreement.

Yes

Yes

No

Question 4 – Response: Yes

Comments: The Implementation Plan can be read that it obligates applicable entities to complete the initial risk assessment in Requirement R1, on or before the effective date of the standard. The implementation plan should be adjusted.

The following is a suggestion to facilitate reading of the standard and stay within defined terms without introducing new terms which are undefined: For all requirements: Replace the expression "Transmission stations and Transmission substations" with "Transmission facilities". Otherwise, please explain why such a distinction is necessary.

While the requirement for unaffiliated third party verification of the physical security plan is something required by the FERC in its order, the mandate is misguided and will lead to security breaches while at the same time adding no incremental value to the physical security plan. The utility, which owns the assets, is already highly incentivized to put together a good security plan to avoid loss of its facilities to terrorism without third party verification. The utility may decide to use security consultants to help develop the plan if it involves new, state of the art physical security topics outside the utilities experience base. On balance the third party verification requirement outlined in R6 regarding the physical security plan is unneeded.

**Additional comment received from Marcus Pelt, Southern Company**

“The wording of Requirement R2.s, as it stands currently, could be interpreted to place requirements on the unaffiliated third party verifier when the responsible entity is actually the Transmission Owner. Southern recommends that R2.2 be reworded as follows to address this concern:

Proposed R2.2

2.2 The responsible Transmission Owner shall ensure the unaffiliated third party verification is completed within 90 calendar days following the completion of the Requirement R1 risk assessment. The unaffiliated third party verification may, but is not required to, include recommended additions or deletions of Transmission station(s) or Transmission substation(s).”