Unofficial Comment Form

Project 2012-13 Nuclear Plant Interface Coordination

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=0212882e43ea486eb56579b90089be5a) to submit comments on the draft Five-Year Review Recommendation on NUC-001-2. A draft Standard Authorization Request (SAR) for NUC-001-2 that shows the scope of the recommended changes is also posted for information. The electronic comment form must be completed by 8:00 p.m. ET **September 9, 2013**.

If you have questions please contact [Sean Cavote](mailto:sean.cavote@nerc.net) (via email) or by telephone at 404.446.9697.

[NUC-001-2 Five-Year Review Project Page](http://www.nerc.com/pa/Stand/Pages/NUCFiveYearReviewTeam.aspx)

## Background Information

The Standards Committee assigned seven subject matter experts to review the NUC standard as part of NERC’s obligation to conduct periodic reviews of its standards. The Five-Year Review Team recommends certain revisions to NUC-001-2 to provide greater clarity and to sharpen industry focus on tasks that have a more direct impact on reliability. As required by the NERC Standard Processes Manual, this recommendation is being posted for stakeholder comment prior to being finalized and submitted to the Standards Committee.

This posting includes three documents: the draft Five-Year Review of NUC-001-2, with a recommendation to revise; and two supporting documents to assist stakeholders in understanding the scope of revisions the review team is recommending:

* Draft Standards Authorization Request Form to Propose Revisions to NUC-001-2 (to provide additional information on the scope); and
* Redlined NUC-001-2 showing the proposed recommended revisions to the Requirements and other elements of NUC-001-2.

The Five-Year Review Team identified several ambiguous, deficient, or duplicative elements during its review. The revisions proposed in the *Five-Year Review Recommendation to Revise NUC-001-2* would enhance clarity in several requirements critical to reliability, and improve compliance efficiency by removing elements not necessary for reliability. Specifically, the Five-Year Review Team has identified the following sections and requirements for revision (additional detail is provided in the Proposed Revisions to NUC-001-2 document, also included with this posting):

**NUC-001-2, Nuclear Interface Coordination**

1. Applicability, 4.1: The term “Nuclear Plant Generator Operator” should be pluralized to clarify that the standard applies to all Nuclear Plant Generator Operators.
2. R5 should be revised for consistency with R4 and to clarify that nuclear plants must be operated to meet the Nuclear Plant Interface Requirements.
3. As explained in the attached *Position Paper on NUC-001-2 R7 and R8*, the term “Protection Systems” should be omitted from requirements R7 and R8, and language should be added to clarify requirement applicability.
4. R9 and R9.4.1 should be revised to clarify requirement applicability.
5. Section E. Regional Differences should be revised to remove reference to specific Nuclear Regulatory Commission regulations and to clarify that there are no Canadian Regulatory requirements for electrical power from the electric network to permit safe shutdown.
6. Modify the Violation Severity Levels and Violation Risk Factors to conform to NERC guidelines.
7. Revise measures to ensure appropriate clarity and applicability to each corresponding requirement.
8. Make errata-type changes where warranted.
9. Add Time Horizons to each requirement.

## Questions

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

1. Do you agree with this recommendation? If not, please explain specifically what aspects of the recommendation you disagree with.

Yes

No

Comments:

2. Do you agree that NUC-001-2 should be revised?

Yes

No

Comments:

3. A draft SAR and redline of NUC-001-2 showing the proposed recommended revisions to the Requirements of NUC-001-2 have been posted with the Nuclear Plant Interface Coordination (Project 2012-13) Five-Year Review Team (FYRT) Draft Recommendation. If you agree that NUC-001-2 should be revised, do you agree that the redlined NUC-001-2 standard posted with the SAR is an effective and reasonable implementation of that recommendation? Please note that if the recommendation to revise NUC-001-2 is made in the final recommendation and accepted by the Standards Committee, any changes will be made through the formal standards development process.

Yes

No

Comments:

4. If you have any other comments on the Five-Year Review Recommendation to Revise or the SAR that you have not already mentioned above, please provide them here:

Comments: