A. Introduction

- 1. Title: Nuclear Plant Interface Coordination
- 2. Number: NUC-001-24
- **3. Purpose:** This standard requires coordination between Nuclear Plant Generator Operators and Transmission Entities for the purpose of ensuring nuclear plant safe operation and shutdown.
- 4. Applicability:
 - **4.1.** Nuclear Plant Generator Operator.
 - **4.2.** Transmission Entities shall mean all entities that are responsible for providing services related to Nuclear Plant Interface Requirements (NPIRs). Such entities may include one or more of the following:
 - **4.2.1** Transmission Operators.
 - **4.2.2** Transmission Owners.
 - **4.2.3** Transmission Planners.
 - **4.2.4** Transmission Service Providers.
 - **4.2.5** Balancing Authorities.
 - **4.2.6** Reliability Coordinators.
 - **4.2.7** Planning <u>Authorities Coordinators</u>.
 - **4.2.8** Distribution Providers.
 - **4.2.9** Load-serving Entities.
 - **4.2.10** Generator Owners.
 - **4.2.11** Generator Operators.
- 5. Effective Date: First day of first quarter 15 months after applicable regulatory approvals. This standard shall become effective the later of either April 1, 2010 or the first day of the first calendar quarter after applicable regulatory approval; or in those jurisdictions where no regulatory approval is required, the later of either April 1, 2010 or the first day of the first calendar quarter after Board of Trustees adoption.

B. Requirements

- **R1.** The Nuclear Plant Generator Operator shall provide the proposed NPIRs in writing to the applicable Transmission Entities and shall verify receipt [*Violation Risk Factor: Lower*]
- **R2.** The Nuclear Plant Generator Operator and the applicable Transmission Entities shall have in effect one or more Agreements¹ that include mutually agreed to NPIRs and document how the Nuclear Plant Generator Operator and the applicable Transmission Entities shall address and implement these NPIRs. [Violation Risk Factor: Medium]
- **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 results of these analyses to the Nuclear Plant Generator Operator. [*Violation Risk Factor: Medium*]
- **R4.** Per the Agreements developed in accordance with this standard, the applicable Transmission Entities shall: [*Violation Risk Factor: High*]
 - **R4.1.** Incorporate the NPIRs into their operating analyses of the electric system.
 - **R4.2.** Operate the electric system to meet the NPIRs.
 - **R4.3.** Inform the Nuclear Plant Generator Operator when the ability to assess the operation of the electric system affecting NPIRs is lost.
- **R5.** The Nuclear Plant Generator Operator shall operate per the Agreements developed in accordance with this standard. [*Violation Risk Factor: High*]
- **R6.** Per the Agreements developed in accordance with this standard, the applicable Transmission Entities and the Nuclear Plant Generator Operator shall coordinate outages and maintenance activities which affect the NPIRs. [Violation Risk Factor: *Medium*]
- **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, configuration, operations, limits, protection systems, or capabilities that may impact the ability of the electric system to meet the NPIRs. [*Violation Risk Factor: High*]
- **R8.** Per the Agreements developed in accordance with this standard, the applicable Transmission Entities shall 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. [*Violation Risk Factor: High*]

Approved by Board of Trustees: May 2, 2007 <u>Draft 2: May 5, 2009</u>
<u>Effective Date:First day of first quarter 15 months after applicable regulatory approvals.</u>

^{1.} Agreements may include mutually agreed upon procedures or protocols <u>for both a single integrated system and in effect between entities or between departments of a vertically integrated system</u>.

- **R9.** The Nuclear Plant Generator Operator and the applicable Transmission Entities shall include, as a minimum, the following elements within the agreement(s) identified in R2: [*Violation Risk Factor: Medium*]
 - **R9.1.** Administrative elements:
 - **R9.1.1.** Definitions of key terms used in the agreement.
 - **R9.1.2.** Names of the responsible entities, organizational relationships, and responsibilities related to the NPIRs.
 - **R9.1.3.** A requirement to review the agreement(s) at least every three years.
 - **R9.1.4.** A dispute resolution mechanism.
 - **R9.2.** Technical requirements and analysis:
 - **R9.2.1.** Identification of parameters, limits, configurations, and operating scenarios included in the NPIRs and, as applicable, procedures for providing any specific data not provided within the agreement.
 - **R9.2.2.** Identification of facilities, components, and configuration restrictions that are essential for meeting the NPIRs.
 - **R9.2.3.** Types of planning and operational analyses performed specifically to support the NPIRs, including the frequency of studies and types of Contingencies and scenarios required.
 - **R9.3.** Operations and maintenance coordination:
 - **R9.3.1.** Designation of ownership of electrical facilities at the interface between the electric system and the nuclear plant and responsibilities for operational control coordination and maintenance of these facilities.
 - **R9.3.2.** Identification of any maintenance requirements for equipment not owned or controlled by the Nuclear Plant Generator Operator that are necessary to meet the NPIRs.
 - **R9.3.3.** Coordination of testing, calibration and maintenance of on-site and off-site power supply systems and related components.
 - **R9.3.4.** Provisions to address mitigating actions needed to avoid violating NPIRs and to address periods when responsible Transmission Entity loses the ability to assess the capability of the electric system to meet the NPIRs. These provisions shall include responsibility to notify the Nuclear Plant Generator Operator within a specified time frame.
 - **R9.3.5.** Provision <u>for considering</u>, <u>within the restoration process</u>, <u>the requirements and urgency of a nuclear plant that has lost all off-site and on-site AC power. to consider nuclear plant coping time required by the NPLRs and their relation to the coordination of grid and</u>

- nuclear plant restoration following a nuclear plant loss of Off-site Power.
- **R9.3.6.** Coordination of physical and cyber security protection of the Bulk Electric System at the nuclear plant interface to ensure each asset is covered under at least one entity's plan.
- **R9.3.7.** Coordination of the NPIRs with transmission system Special Protection Systems and underfrequency and undervoltage load shedding programs.
- **R9.4.** Communications and training:
 - **R9.4.1.** Provisions for communications between the Nuclear Plant Generator Operator and Transmission Entities, including communications protocols, notification time requirements, and definitions of terms.
 - **R9.4.2.** Provisions for coordination during an off-normal or emergency event affecting the NPIRs, including the need to provide timely information explaining the event, an estimate of when the system will be returned to a normal state, and the actual time the system is returned to normal.
 - **R9.4.3.** Provisions for coordinating investigations of causes of unplanned events affecting the NPIRs and developing solutions to minimize future risk of such events.
 - **R9.4.4.** Provisions for supplying information necessary to report to government agencies, as related to NPIRs.
 - **R9.4.5.** Provisions for personnel training, as related to NPIRs.

C. Measures

- M1. The Nuclear Plant Generator Operator shall, upon request of the Compliance Enforcement Authority Monitor, provide a copy of the transmittal and receipt of transmittal of the proposed NPIRs to the responsible Transmission Entities. (Requirement 1)
- M2. The Nuclear Plant Generator Operator and each Transmission Entity shall each have a copy of the Agreement(s) addressing the elements in Requirement 9 available for inspection upon request of the Compliance Enforcement Authority Monitor.

 (Requirement 2 and 9)
- M3. Each Transmission Entity responsible for planning analyses in accordance with the Agreement shall, upon request of the Compliance Enforcement AuthorityMonitor, provide a copy of the planning analyses results transmitted to the Nuclear Plant Generator Operator, showing incorporation of the NPIRs. The Compliance Enforcement AuthorityMonitor shall refer to the Agreements developed in accordance with this standard for specific requirements. (Requirement 3)

- **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**Monitor*:
 - **M4.1** The NPIRs have been incorporated into the current operating analysis of the electric system. (Requirement 4.1)
 - **M4.2** The electric system was operated to meet the NPIRs. (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. (Requirement 4.3)
- **M5.** The Nuclear Plant Generator Operator shall, upon request of the Compliance Enforcement Authority Monitor, demonstrate or provide evidence that the Nuclear Power Plant is being operated consistent with the Agreements developed in accordance with this standard. (Requirement 5)
- **M6.** The Transmission Entities and Nuclear Plant Generator Operator shall, upon request of the Compliance Enforcement Authority Monitor, provide evidence of the coordination between the Transmission Entities and the Nuclear Plant Generator Operator regarding outages and maintenance activities which affect the NPIRs. (Requirement 6)
- **M7.** The Nuclear Plant Generator Operator shall provide evidence that it informed the applicable Transmission Entities of changes to nuclear plant design, configuration, operations, limits, protection systems, or capabilities that would impact the ability of the Transmission Entities to meet the NPIRs. (Requirement 7)
- **M8.** The Transmission Entities shall each provide evidence that it informed the Nuclear Plant Generator Operator of changes to electric system design, configuration, operations, limits, protection systems, or capabilities that would impact the ability of the Nuclear Plant Generator Operator to meet the NPIRs. (Requirement 8)

D. Compliance

- 1. Compliance Monitoring Process
 - 1.1. Compliance Enforcement Authority Monitoring Responsibility
 Regional Reliability Organization Entity.
 - 1.2. Compliance Monitoring Period and Reset Time Frame

One calendar yearNot applicable.

1.3. Compliance Monitoring and Enforcement Processes:

Compliance Audits

Self-Certifications

Spot Checking

Compliance Violation Investigations

Self-Reporting

Complaints

1.3.1.4. Data Retention

The Responsible Entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:

- For Measure 1, the Nuclear Plant Generator Operator shall keep its latest transmittals and receipts.
- For Measure 2, the Nuclear Plant Generator Operator and each Transmission Entity shall have its current, in-force agreement.
- For Measure 3, the Transmission Entity shall have the latest planning analysis results.
- For Measures 4.3, 6 and 8, the Transmission Entity shall keep evidence for two years plus current.
- For Measures 5, 6 and 7, the Nuclear Plant Generator Operator shall keep evidence for two years plus current.

If a <u>Responsible n eE</u>ntity is found non-compliant the entity it shall keep information related to the noncompliance until found compliant or for two years plus the current year, whichever is longer.

Evidence used as part of a triggered investigation shall be retained by the entity being investigated for one year from the date that the investigation is closed, as determined by the Compliance Enforcement Authority Monitor.

The Compliance <u>Enforcement Authority</u> Monitor shall keep the last <u>periodic</u> audit <u>report-records</u> and all requested and submitted subsequent <u>compliance</u> <u>audit</u> records.

1.4.1.5. Additional Compliance Information

The Nuclear Plant Generator Operator and Transmission Entities shall each demonstrate compliance through self-certification or audit (periodic, as part of targeted monitoring or initiated by complaint or event), as determined by the Compliance Enforcement authority Monitor. None.

2. Violation Severity Levels

- **2.1.** Lower: Agreement(s) exist per this standard and NPIRs were identified and implemented, but documentation described in M1-M8 was not provided.
- **2.2. Moderate:** Agreement(s) exist per R2 and NPIRs were identified and implemented, but one or more elements of the Agreement in R9 were not met.
- **2.3. High:** One or more requirements of R3 through R8 were not met.

2.4. Severe: No proposed NPIRs were submitted per R1, no Agreement exists per this standard, or the Agreements were not implemented.

E. Regional Variances

The design basis for Canadian (CANDU) NPPs does not result in the same licensing requirements as U.S. NPPs. NRC design criteria specifies that in addition to emergency onsite electrical power, electrical power from the electric network also be provided to permit safe shutdown. This requirement is specified in such NRC Regulations as 10 CFR 50 Appendix A — General Design Criterion 17 and 10 CFR 50.63 Loss of all alternating current power. There are no equivalent Canadian Regulatory requirements for Station Blackout (SBO) or coping times as they do not form part of the licensing basis for CANDU NPPs. Therefore the definition of NPLR for Canadian CANDU units will be as follows:

Nuclear Plant Licensing Requirements (NPLR) 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 as a result of an electric system disturbance, transient, or condition.

F. Associated Documents

Version History

Version	Date	Action	Change Tracking
1	May 2, 2007	Approved by Board of Trustees	New
2	To be determined	Modifications for Order 716 to Requirement R9.3.5 and footnote 1; modifications to bring compliance elements into conformance with the latest version of the ERO Rules of Procedure.	Revision