

Review of NUC-001-2—Nuclear Plant Interface Coordination (Filing 2)

<http://www.nerc.com/files/NUC-001-2.pdf>

VSLs for Requirement R4:

Standard, Requirement	Requirement Language	Lower	Moderate	High	Severe	Notes
NUC-001-2, R4	<p>Per the Agreements developed in accordance with this standard, the applicable Transmission Entities shall:</p> <p>R4.1. Incorporate the NPIRs into their operating analyses of the electric system.</p> <p>R4.2. Operate the electric system to meet the NPIRs.</p> <p>R4.3. Inform the Nuclear Plant Generator Operator when the ability to assess the operation of the electric system affecting NPIRs is lost.</p>	N/A	<p>The responsible entity did not comply with sub-requirement R4.3 but is compliant with sub-requirements R4.1 and R4.2.</p>	<p>The responsible entity did not comply with R4.1 but is compliant with R4.2.</p>	<p>The responsible entity did not comply with R4.2.</p>	<p>FERC expressed concern that the VSL assignments represented a violation of Guideline 3 because they did not appropriately address the subrequirements.</p> <p>NERC staff agreed and modified the VSLs to more clearly incorporate the subrequirements.</p>

Original Guideline Explanation for R4 VSLs in [December 1, 2010 VSL Filing 2](#):

In accordance with Guideline 2, the VSLs were modified for clarity and consistency with other standards and VSLs. The VSLs were modified to be consistent with FERC Guideline 3.

- *Guideline 1:* See P. 962 of Guideline 1 Analysis in [March 5, 2012 VSL Filing 1](#)
- *Guideline 2:* Per stakeholder feedback, the VSLs were revised to incorporate additional VSL gradation. A Moderate VSL was added. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Thus, no changes to the VSLs were required to comply with Guideline 2a. Additionally, NERC has reviewed the VSL text and has determined that, with the correction of typographical errors, stylistic edits or format changes, the VSL text is clear, specific and objective and does not contain general, relative or subjective language satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.
- *Guideline 3:* In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. The wording in original VSLs were not consistent with the R4 primary or subrequirements. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty. The VSL assignments comply with Guideline 4, because they are based on a single violation of a Reliability Standard and are not based on a cumulative number of violations of the same requirement over a period of time.
- *Guideline 4:* The VSL assignments comply with Guideline 4, because they are based on a single violation of a Reliability Standard and are not based on a cumulative number of violations of the same requirement over a period of time.