

Standards Authorization Request Form

NERC welcomes suggestions to improve the reliability of the bulk power system through improved reliability standards. Please use this form to submit your request to propose a new or revised NERC Reliability Standard.

| Request to propose a new or a revised Reliability Standard | | | | | |
|--|----------------|--|------------------------------|----------------------------|--|
| Title of Proposed Standard: | | Nuclear Plant Interface Coordination – NUC-001-2.1 (Project 2012-13) | | | |
| Date Submitted: | | October 1, 2013 | | | |
| SAR Requester Information | | | | | |
| Name: John Gyrath | | | | | |
| Organization: | Exelon Gene | eration LLC (Nuclear) | | | |
| Telephone: 610.765.569 | | 2 | E-mail: | john.gyrath@exeloncorp.com | |
| SAR Type (Chec | k as many as a | applicable) | | | |
| New Standard | | Wit | hdrawal of existing Standard | | |
| Revision to existing Standard | | Urg | ent Action | (| |

SAR Information

Industry Need (What is the industry problem this request is trying to solve?):

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 concluded that NUC-001-2.1 remains necessary for reliability by requiring coordination between Nuclear Plant Generator Operators and Transmission Entities to ensure nuclear plant safe operation and shutdown. The standard, however, requires revision to provide greater clarity and to sharpen industry focus on tasks that have a more direct impact on reliability.

Purpose or Goal (How does this request propose to address the problem described above?):

This SAR proposes revising NUC-001-2.1 in line with the recommendations of the NUC Five-Year Review Team as described in the *Five-Year Review Recommendation to Revise NUC-001-2.1*, (Attachment 1).



SAR Information

The proposed changes to the standard add clarity, remove redundancy, and bring compliance elements in accordance with NERC guidelines. The NUC Five-Year Review Team recommends revising R5 to make it consistent with R4, and to state that the Nuclear Plant Generator Operator shall operate the nuclear plant to meet the NPIRs. The team also recommends removing the reference in R7 and R8 to "Protection Systems" as defined in the NERC Glossary of Terms to focus the standard on attributes that could impact the NPIRs, such as frequency or voltage setpoints, and not the expanded five elements of the defined term. Protection systems are a subset of the nuclear plant design and electric system design attributes referenced in R7 and R8 respectively, and reference to setpoints will be made with these attributes. The team recommends revising the Effective Date section to account for jurisdictional differences in the Canadian provinces. The team recommends revising R9 to clarify that that all agreements do not have to discuss each of the elements in R9, but that the sum total of the agreements need to address the elements. The team also recommends revising the Regional Differences section 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, and to revise the definition of "NPLR" to remove the potential conflict with a NERC Glossary of Terms definition. Finally, the team also recommends several errata type changes throughout the standard, as identified in the Five-Year Review Recommendation to Revise NUC-001-2.1.

Identify the Objectives of the proposed standard's requirements (What specific reliability deliverables are required to achieve the goal?):

The objective of NUC-001-2 is to require coordination between Nuclear Plant Generator Operators and Transmission Entities to ensure nuclear plant safe operation and shutdown. This objective supports reliability principles 1, 2, 3, 4, and 8 by requiring: (1) the planning and operation of the Bulk Electric System (BES) to consider the unique requirements of nuclear plants; (2) consideration of the nuclear plant requirements in the defined frequency and voltage limits established for BES operation; (3) the nuclear plant unique information necessary for the planning and operation of interconnected bulk power systems be made available to those entities responsible for planning and operating the systems reliably; (4) plans for emergency operation and system restoration of interconnected bulk power system elements be coordinated with the requirements of nuclear plants; and (8) coordination of physical and cyber security protection of the BES at the nuclear plant interface.

Brief Description (Provide a paragraph that describes the scope of this standard action.)

The scope of this standard action is to revise NUC-001-2.1 in accordance with the recommendations made by the Five-Year Review Team in the Five-Year Review Recommendation to Revise NUC-001-2.1,



SAR Information

(Attachment 1), and consistent with industry consensus to make additional standard revisions to the extent such consensus develops.

Detailed Description (Provide a description of the proposed project with sufficient details for the standard drafting team to execute the SAR. Also provide a justification for the development or revision of the standard, including an assessment of the reliability and market interface impacts of implementing or not implementing the standard action.)

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-001-2.1* 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:

- The standard applies to all Nuclear Plant Generator Operators. Therefore, the term "Nuclear Plant Generator Operator" should be pluralized in section A.4. Applicability.
- R5 should be revised for consistency with R4 and to clarify that nuclear plants must be operated to meet the Nuclear Plant Interface Requirements.
- 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.
- R9 and R9.4.1 should be revised to clarify requirement applicability.
- 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. The term Canadian Nuclear Power Plant Licensing Requirements (CNPLR) is defined in the proposed revision to the standard as a means to differentiate the unique licensing requirements of the Canadian Nuclear Power Plants from those of the U.S. NPPs.
- Modify the Violation Severity Level and Violation Risk Factor matrices to conform to NERC guidelines.
- Revise measures to ensure appropriate clarity and applicability to each corresponding requirement.
- Add Time Horizons to each requirement.



Reliability Functions The Standard will Apply to the Following Functions (Check each one that applies.) Responsible for the real-time operating reliability of its Reliability \square **Reliability Coordinator** Coordinator Area in coordination with its neighboring Reliability Coordinator's wide area view. Integrates resource plans ahead of time, and maintains load- \bowtie **Balancing Authority** interchange-resource balance within a Balancing Authority Area and supports Interconnection frequency in real time. Ensures communication of interchange transactions for reliability Interchange Authority evaluation purposes and coordinates implementation of valid and balanced interchange schedules between Balancing Authority Areas. M **Planning Coordinator** Assesses the longer-term reliability of its Planning Coordinator Area. Develops a >one year plan for the resource adequacy of its specific loads Resource Planner within a Planning Coordinator area. Develops a >one year plan for the reliability of the interconnected Bulk \boxtimes Transmission Planner Electric System within its portion of the Planning Coordinator area. Administers the transmission tariff and provides transmission services **Transmission Service** \boxtimes under applicable transmission service agreements (e.g., the pro forma Provider tariff). \boxtimes Owns and maintains transmission facilities. **Transmission Owner** Transmission Ensures the real-time operating reliability of the transmission assets \boxtimes within a Transmission Operator Area. Operator \boxtimes **Distribution Provider** Delivers electrical energy to the End-use customer. \boxtimes **Generator Owner** Owns and maintains generation facilities. X **Generator Operator** Operates generation unit(s) to provide real and reactive power. Purchases or sells energy, capacity, and necessary reliability-related Purchasing-Selling **Entity** services as required. Market Operator Interface point for reliability functions with commercial functions.



| | Reliability Functions |
|---------------------|---|
| Load-Serving Entity | Secures energy and transmission service (and reliability-related services) to serve the End-use Customer. |

| | Reliability and Market Interface Principles | | |
|-------------|---|--------------|--|
| Appl | Applicable Reliability Principles (Check all that apply). | | |
| \boxtimes | 1. Interconnected bulk power systems shall be planned and operated in a coordina to perform reliably under normal and abnormal conditions as defined in the NER | | |
| | 2. The frequency and voltage of interconnected bulk power systems shall be controdefined limits through the balancing of real and reactive power supply and demandable. | | |
| | Information necessary for the planning and operation of interconnected bulk po shall be made available to those entities responsible for planning and operating reliably. | • | |
| | Plans for emergency operation and system restoration of interconnected bulk possible shall be developed, coordinated, maintained and implemented. | ower systems | |
| \boxtimes | 5. Facilities for communication, monitoring and control shall be provided, used and for the reliability of interconnected bulk power systems. | l maintained | |
| | 6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions. | | |
| | 7. The security of the interconnected bulk power systems shall be assessed, monito maintained on a wide area basis. | ored and | |
| \boxtimes | 8. Bulk power systems shall be protected from malicious physical or cyber attacks. | | |
| Does | Does the proposed Standard comply with all of the following Market Interface Enter | | |
| Princ | ciples? | (yes/no) | |
| 1 | A reliability standard shall not give any market participant an unfair competitive advantage. | Yes | |
| 2 | A reliability standard shall neither mandate nor prohibit any specific market Structure. Yes | | |
| 3 | 8. A reliability standard shall not preclude market solutions to achieving compliance with that standard. | Yes | |
| 4 | . A reliability standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards. | Yes | |



| Related Standards | | |
|-------------------|-------------|--|
| Standard No. | Explanation | |
| | | |
| | | |
| | | |
| | | |

| Related SARs – N/A | | |
|--------------------|-------------|--|
| SAR ID | Explanation | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |

| Regional Variances – N/A | |
|--------------------------|-------------|
| Region | Explanation |
| ERCOT | |
| FRCC | |
| MRO | |
| NPCC | |
| RFC | |



| Regional Variances – N/A | | |
|--------------------------|--|--|
| SERC | | |
| SPP | | |
| WECC | | |
| | The FYRT proposed a definition change in section E. Regional Differences to eliminate a potential unintended conflict with a NERC Glossary term. | |