

COMMENT FORM
Proposed Reliability Standard on Coordination of Nuclear Power Plant Licensing Requirements in Bulk Electric System Planning and Operations

This form is to be used to submit comments on the proposed Standard Authorization Request to develop a standard entitled: **Coordination of Nuclear Power Plant Licensing Requirements in Bulk Electric System Planning and Operations**. Comments must be submitted by **May 2, 2005**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words “Nuclear Power Plant SAR Comments” in the subject line. If you have questions please contact Gerry Cauley at gerry.cauley@nerc.net or by telephone at (609) 947-3885.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE AND IT IS THEREFORE IMPORTANT TO ADHERE TO THE FOLLOWING REQUIREMENTS:

- DO:**
- Do enter text only, with no formatting or styles added.
 - Do use punctuation and capitalization as needed (except quotations).
 - Do use more than one form if responses do not fit in the spaces provided.
 - Do submit any formatted text or markups in a separate WORD file.

- DO NOT:**
- Do not insert tabs or paragraph returns in any data field.
 - Do not use numbering or bullets in any data field.
 - Do not use quotation marks in any data field.
 - Do not submit a response in an unprotected copy of this form.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	P. D. Henderson	
Organization:	Independent Electricity System Operator (IESO)	
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Email:	Peter.Henderson@IESO.CA	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC		
<input type="checkbox"/> NA		

Background Information:

Draft 2 of a SAR proposing a standard on coordination between Nuclear Power Plant licensees and entities responsible for the planning, assessment, analysis and operation of the electric system is now posted for comment. This second draft clarifies the scope of the proposed standard and addresses comments received from the posting of the first draft of the SAR.

Comment Form – Proposed Standard on Nuclear Power Plants

Question 1: Do you agree there is a Bulk Electric System reliability need and a public health and safety need for coordinating the offsite electricity supply needs of a nuclear power plant with the planning, assessment, analysis, and operator of the electric system?

Yes

No

If no, please explain in the space provided below.

Comments

We agree that is important that the Bulk Electric System supports the safe operation of any generator from both an Electric system reliability perspective and a plant reliability/safety perspective. However, specific requirements over and above what would be normally provided for generators should be addressed in the Interconnection Agreement with the Transmission owner which would also provide for cost recovery mechanism if a generator licence requires a higher level of supply than the norm. Since the "norm" is already covered by several NERC standards that are in place, we feel there should not be special NERC standards for nuclear facilities. If changes are needed they could be added to existing standards rather than creating a separate standard according to fuel type.

Question 2: Do you agree with the scope of the proposed standard?

Yes

No

Please explain in the space provided below any specific changes you suggest to the scope of the proposed standard.

Comments

See Comments in # 1 above

We disagree with a specific standard being tied to NPP licensing requirements. These should be recognized in the Interconnection Agreements between the Transmission Owner and the NPP which could be referred to in the additions to the generator standards. If the licence linkages were removed and the requirements were general to involve any generator then we feel the scope is reasonable as it reflects current practices in most cases.

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Question 3: Do you agree with the list of responsible entities to which this standard would apply? Please note the standard is proposed to apply to the following entities that interface with or provide service to a Nuclear Power Plant:

- **Generator Operator/Owner** – coordinates NPP requirements with the entities responsible for planning and operations of the electric system. Other nearby generator owners/operators may be required to notify the electric system operators of plant changes affecting a nearby NPP.
- **Reliability Authority, Transmission Owner/Operator, Distribution Provider, Load-Serving Entity** – incorporate NPP requirements for offsite power supply into planning, operation and analysis of electric system. LSE may be involved if offsite power is provided through an LSE rather than through a transmission owner/operator.
- **Transmission Service Provider** – manages tariff and transmission service arrangements used by the NPP.
- **Planning Authority, Transmission and Resource Planners** – develop transmission and resource plans; assess electric system supply and delivery capability to meet NPP offsite power requirements.
- **Balancing Authority and Market Operator** – Incorporate NPP offsite power supply constraints into reliability-constrained dispatch and provision and deployment of Interconnected Operations Services.

Yes

No

If no, please explain which responsible entities should be added or removed from the list of applicable entities in the SAR.

If this Standard does move forward then the following comments apply:

The terminologies and/or functions of responsible entities outlined above are undergoing revisions re: Functional Model Working Group(FMWG). Any changes/revisions in above mentioned FM terminologies/functions, once approved, should be updated/included in this proposed standard.

Moreover, the implementation and application of this standard in terms of coordination with other Functional Model related entities should need to allow for a transition period until the FM related entities are fully certified.

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Question 4: Do you have any additional comments regarding the SAR that you believe should be addressed?

Yes

No

If yes, please share those comments in the space provided below.

See comments in Q # 1 and 2 above