

**COMMENT FORM
Proposed Nuclear Offsite Supply Reliability Standard**

This form is to be used to submit comments on the proposed Nuclear Offsite Supply Reliability Standard Authorization Request. Comments must be submitted by **January 07, 2005**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words “Nuclear Offsite Supply Reliability SAR Comments” in the subject line. If you have questions please contact Mark Ladrow at mark.ladrow@nerc.net or by telephone at 609-452-8060.

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.)		
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NERC Region	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 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 - Not Applicable		

Comment Form – Proposed Nuclear Offsite Supply Reliability Standard

Background Information:

Posted for comments is the first posting of the Nuclear Offsite Supply Reliability SAR. The NEI Reliability Task Force has identified the offsite electric supply characteristics to nuclear plants as potentially being inconsistent with the requirements of 10CFR50 Appendix A- General Design Criteria for Nuclear Power Plants. This Standard Authorization Request was initiated to address this concern by requiring the Reliability Authority and Planning Authority to specifically incorporate the key parameters of the offsite electric supply as delineated in each nuclear power plant's licensing and design base.

The requestor would like to receive industry comments on this SAR and to obtain the input of the industry prior to determining the final scope and requirements of the SAR. Accordingly, we request your comments included on this form, emailed with the subject "Nuclear Offsite Supply Reliability SAR Comments" by January 07, 2005.

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Question 1: Do you agree there is a reliability need for a specifying the offsite electric supply characteristics provided to nuclear power plants so that the planning studies and reliability calculations are consistent with the nuclear design basis?

Yes

No

If no, please explain in the space provided below.

Comments

We could not find any inconsistencies mentioned in the recommendations in the US-Canada Task Force report. However, we recognize that recognition of the special needs of nuclear power plants (NPP) may warrant documentation in a standard with appropriate scope that addresses the real issues. If there are inconsistencies with Criterion 17 the scope should include them.

Note, it is not clear what is not being considered in the planning studies or reliability calculations. It should be noted that the proposed scope goes beyond planning studies and reliability calculations and includes communications with the NPP which is not mentioned in this question.

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

Yes

No

If no, please explain in the space provided below.

It is not clear as to what is not being done now or covered by current standards. For instance, it is our belief that studies under the present standards would address the required voltage and reactive capabilities at the interconnection with the NPP.

The scope needs to better address any specific inconsistencies that have been identified, if there are any.

Criterion 17 recognizes both an onsite and an offsite supply of electrical power to the NPP. It should be made clear in the SAR that the NPPs will also have an independent & fully capable on site electric power supply for a controlled safe shutdown, etc.

The SAR refers to written agreements between the Transmission System Operator and the NPP. Flexibility should be provided such that this can be handled in other ways, such as through operations policies, market rules, etc.

While the current licensing requirement as specified in CFR 50, Appendix A-General Design Criterion 17 may be acceptable, we have concern that other licensing requirements or future changes may not be readily achievable. Hence, the NERC standard should be written such that it refers only to the agreements or operating policies, market rules, etc rather than the NPP specific licensing and design requirements.

It should be noted that in some cases communications from the RA may go through an intermediary before it reaches the NPP

Comments

The scope needs to be reworked.

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Question 3: Do you agree with the intent of the proposal to add these requirements to existing standards as opposed to creating new standards?

Yes

No

Do you agree with the proposed location in existing standards?

Yes

No

If no, please identify the location you believe would be the most appropriate for the proposed standard.

If there are true inconsistencies with criterion 17, then this should be a new stand alone standard to give it more prominence.

The proposed Nuclear Offsite Supply Reliability Standard is an important action to address a recommendation of the August 2003 Blackout Investigation. The time and effort should be taken to properly create the standard in a well thought manner. Not a rush job that gives the impression of being forced on the industry.

The IRC disagrees with the attempt to add these requirements to existing standards. These standards apply to a separate and distinct segment of the power industry. In as much as these standards only apply to nuclear power plants, a new standard regarding nuclear power plants should be created. The standards will be hard to find in the proposed locations. .

Comments

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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.

Note: In many cases these standards are being met now by RTO's and ISO's.

It would be beneficial if the NEI concerns were specified regarding the inconsistency. The standard should recognize that the RC function is currently adopted for the Version 0 Standards rather than the RA function. Also, the term Transmission Operator should be used rather than Transmission System Operator.