

Unofficial Comment Form for Nuclear Plant Interface Coordination SAR and Standard — Project 2009-08

Please DO NOT use this comment form. Please use the electronic comment form located at the link below to submit comments on the SAR and proposed revisions to NUC-001-1. Comments must be submitted by **March 18, 2009**. If you have questions please contact **Darrel Richardson** at Darrel.Richardson@nerc.net or by telephone at 609-613-1848.

http://www.nerc.com/filez/standards/Project2009-08_Nuclear_Plant_Interface_Coordination.html

Background Information:

The Nuclear Plant Interface Coordination standard is designed to require coordination between Nuclear Plant Generator Operators and Transmission Entities for the purpose of ensuring nuclear plant safe operation and shutdown. The proposed revisions will address two directives in Order 716 that are aimed at addressing stakeholder concerns for improved clarity. Additional revisions were made to change the term, "Planning Authority" to "Planning Coordinator" (to match the terminology in the latest version of the Functional Model) and to bring the compliance elements of the standard into conformance with the latest version of the ERO Rules of Procedure.

1. Do you agree that there is a reliability related reason for the proposed SAR? If not, please explain in the comment area.

Yes

No

Comments:

This is a safety issue that should be addressed by the Nuclear industry and not a BES issue. Every Nuclear facility is already required to have a 7 day (off-site AC) independent redundant supply of electricity. For example, the Turkey point nuclear facility was able to withstand hurricane Andrew in 1992 and it lost off-site power for 5 days.

The NERC reliability standards are for the protection of the BES. The reliability need should be independent of the generator heat source which drives the prime mover.

2. In Order 716, the Commission indicated that the references in Requirement R9.3.5 to coping times for station blackouts and restoration of off-site power were ambiguous as the relationship between the two issues was unclear. Do you agree that the revisions made to R9.3.5 clarify and distinguish the two issues? If not, please explain in the comment area.

Original: R9.3.5. Provision to consider nuclear plant coping times required by the NPLRs and their relation to the coordination of grid and nuclear plant restoration following a nuclear plant loss of Off-site Power.

Comment Form — NUC-001-2 Nuclear Plant Interface Coordination

Proposed Revision: R9.3.5. Provision to consider a nuclear plant's coping time (the period of time a nuclear plant can function without an AC power source) required by the NPLRs during the restoration of Off-site Power following a loss of all Off-site and On-site AC Power Sources.

Yes

No

Comments:

MRO NSRS believes this revision does clarify and distinguish between the two coping time issues.

However, the concept of "coping time" originated in the Nuclear Regulatory Commission's Station Blackout (SBO) Rule (10 CFR 50.63). The term "station blackout" refers to the complete loss of alternating current electric power to the essential and non-essential switchgear buses in a nuclear plant. Station blackout therefore involves the loss of offsite power concurrent with a turbine trip and the failure of the on-site emergency alternating current power systems (i.e.; emergency diesel generators)

Under the SBO Rule, nuclear plants are required to be able to "cope" with or withstand a station blackout for a specific period of time. Specifically, during a station blackout, nuclear plants must be able to maintain reactor core cooling and containment heat removal capabilities. In the event of a station blackout, most plants utilize emergency station batteries to power essential safety related systems to meet these cooling and heat removal requirements. Essentially, the coping time is the period of time during which the plant has demonstrated it has the capability to ensure that the core is cooled and containment integrity maintained during station blackout conditions.

The SBO Rule, and the plant's licensing requirements, requires the nuclear plants to be able to restore their on-site emergency alternating current (AC) power supplies (i.e. emergency diesel generators) within their coping time. There are no NRC rules and regulations which require that the off-site power be restored within the coping time.

The draft language misrepresents the concept of coping time by linking it to the restoration of off-site AC power. As required by licensing requirements, the nuclear plant operator has responsibility to restore the on-site emergency AC power sources within the demonstrated coping time.

MRO NSRS suggests the following language:

Provision to consider a nuclear plant's coping time for coordinating the required restoration of on-site emergency AC power and the prioritization of the restoration of off-site power following a station blackout event

MRO NSRS believes that our draft language is consistent with the philosophy advocated by the Nuclear Energy Institute (NEI) comments contained in paragraph 105 of Order 716.

3. In Order 716, the Commission wrote:

The Commission directs the ERO, in enforcing NUC-001-1, to require that an integrated entity provides documentation of its arrangements, including appropriate procedures and protocols,

Comment Form — NUC-001-2 Nuclear Plant Interface Coordination

ensuring that its business units perform the functions under NUC-001-1 that would otherwise be met by separate entities.

To meet the intent of this directive, the drafting team proposed the following modification to Footnote 1 for Requirement R2:

Original footnote: 1. Agreements may include mutually agreed upon procedures or protocols

Proposed revision: 1. Agreements may include mutually agreed upon procedures or protocols executed between entities or between departments of a vertically integrated system.

Do you agree that the proposed modification meets the intent of the directive? If not, please explain in the comment area.

Yes

No

Comments:

4. Please provide any other comments on the SAR or proposed revisions to NUC-001-1 that you have not already provided in response to the questions above.

Comments:

NERC should reconsider the primary objective of this standard and determine whether the scope of this SAR should be modified to delete any requirement that doesn't address a grid reliability need.

The MRO NSRS questions whether the VRF values for six requirements should be increased (R2 - Lower to Medium, R4 - Medium to High, R5 - Medium to High, R7 - Medium to High, R8 - Medium to High, R9 - Lower to Medium) without explanation or justification. For example in R2, having an agreement does not have a direct material effect on the BES.