

**FERC-725F, OMB Control No. 1902-0249  
(reflecting both Docket Nos. IC14-16-000 and RD14-13-000)  
(2/24/2015)**

Supporting Statement for  
**FERC-725F, Mandatory Reliability Standard for Nuclear Plant Interface Coordination**

The Federal Energy Regulatory Commission (Commission or FERC) requests that the Office of Management and Budget (OMB) review and approve **FERC-725F, Mandatory Reliability Standard for Nuclear Plant Interface Coordination**, for a three year period. FERC-725F (OMB Control No. 1902-0249) is an existing Commission data collection, as stated by 18 Code of Federal Regulations, Part 40.

As part of this package, FERC is submitting changes related to the retirement of NUC-001-2 and its replacement with reliability standard NUC-001-3.<sup>1</sup> *The renewal (of NUC-001-2, as addressed in Docket No. IC14-16) and the changes implementing superseding NUC-001-3 (in Docket No. RD14-13-000) are combined in this supporting statement due:*

- a. to the close timing of the two dockets and related activities (including the OMB expiration date)
- b. to clarify information for the public, and
- c. to minimize federal burden and cost.

The superseding NUC-001-3 does not change the burden for the FERC-725F information collection.

Compliance with this Reliability Standard is mandatory and enforceable for the applicable categories of entities identified in the Reliability Standard. Reliability Standards are approved by the Commission pursuant to its authority under section 215 of the Federal Power Act (FPA), which authorizes the Commission to approve a Reliability Standard proposed by the Electric Reliability Organization (ERO) if the Commission determines that it is just and reasonable, not unduly discriminatory or preferential and in the public interest. The NUC-001-2 Reliability Standard is necessary for the reliable operation of the nation's interconnected Bulk-Power System.<sup>2</sup>

## **A. Justification**

### **1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY**

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<sup>1</sup> Unless otherwise specified, the NUC-001 Reliability Standard being discussed is the latest version of the standard (Version 3, also called NUC-001-3). NUC-001-2 is being superseded by NUC-001-3. The changes from NUC-001-2 to NUC-001-3 are clarifying in nature and have no effect on either reporting or record-keeping requirements. There is only one NUC standard.

<sup>2</sup> Revised Reliability Standard, NUC-001-3, was filed with the Commission by NERC on September 15, 2014. FERC is addressed Reliability Standard NUC-001-3 in Docket No. RD14-13 and in this supporting statement.

**FERC-725F, OMB Control No. 1902-0249  
(reflecting both Docket Nos. IC14-16-000 and RD14-13-000)  
(2/24/2015)**

In the aftermath of the 1965 Blackout in the northeast United States, the electric industry established the North American Electric Reliability Council (NERC)<sup>3</sup>, a voluntary reliability organization. Since its inception, NERC has developed Operating Policies and Planning Standards that provide voluntary guidelines for operating and planning the North American bulk-power system. In April 2005, NERC adopted “Version 0” reliability standards that translated the NERC Operating Policies, Planning Standards and compliance requirements into a comprehensible set of measurable standards. While NERC had developed a compliance enforcement program to ensure compliance with the reliability standards it developed, industry compliance had been voluntary and not subject to mandatory enforcement penalties. Although NERC’s efforts had been important in maintaining the reliability of the nation’s bulk-power system, NERC itself had recognized the need for mandatory, enforceable reliability standards and had been a proponent of legislation to establish a FERC-jurisdictional ERO that would propose and enforce mandatory reliability standards.

On August 8, 2005, the Electricity Modernization Act of 2005, which is Title XII, Subtitle A, of the Energy Policy Act of 2005 (EPAAct 2005), was enacted into law.<sup>4</sup> EPAAct 2005 added section 215 to the FPA, which requires a Commission-certified ERO to develop mandatory and enforceable Reliability Standards, which are subject to Commission review and approval. Once approved, the Reliability Standards may be enforced by the ERO subject to Commission oversight, or the Commission can independently enforce Reliability Standards.<sup>5</sup>

On February 3, 2006, the Commission issued Order No. 672, implementing section 215 of the FPA.<sup>6</sup> Pursuant to Order No. 672, the Commission certified one organization, NERC, as the ERO.<sup>7</sup> The Reliability Standards developed by the ERO and approved by the Commission apply to users, owners and operators of the Bulk-Power System, as set forth in each Reliability Standard.

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<sup>3</sup> On January 1, 2007, NERC became the North American Electric Reliability Corporation and continues to use the same acronym.

<sup>4</sup> Energy Policy Act of 2005, Pub. L. No. 109-58, Title XII, Subtitle A, 119 Stat. 594, 941 (2005), 16 U.S.C. 824o.

<sup>5</sup> 16 U.S.C. 824o(e)(3).

<sup>6</sup> Rules Concerning Certification of the Electric Reliability Organization; Procedures for the Establishment, Approval and Enforcement of Electric Reliability Standards, Order No. 672, 71 FR 8662 (Feb. 17, 2006), FERC Stats. & Regs. ¶ 31,204 (2006), order on reh’g, Order No. 672-A, 71 FR 19814 (Apr. 18, 2006), FERC Stats. & Regs. ¶ 31,212 (2006).

<sup>7</sup> North American Electric Reliability Corp., 116 FERC ¶ 61,062 (ERO Certification Order), order on reh’g & compliance, 117 FERC ¶ 61,126 (ERO Rehearing Order) (2006), order on compliance, 118 FERC ¶ 61,030 (2007) (Jan. 2007 Compliance Order), appeal docket sub nom. Alcoa, Inc. v. FERC, No. 06-1426 (D.C. Cir. Dec. 29, 2006).

**FERC-725F, OMB Control No. 1902-0249  
(reflecting both Docket Nos. IC14-16-000 and RD14-13-000)  
(2/24/2015)**

In accordance with section 215(d)(2) of the FPA and § 39.5(c) of the Commission's regulations, the Commission is required to give due weight to the technical expertise of the ERO with respect to the content of a Reliability Standard or to a Regional Entity organized on an Interconnection-wide basis with respect to a proposed Reliability Standard or a proposed modification to a Reliability Standard to be applicable within that Interconnection.<sup>8</sup>

The ERO must file with the Commission each new or modified Reliability Standard that it proposes to be made effective under section 215 of the FPA. The Commission can then approve or remand the Reliability Standard. The Commission also can, among other actions, direct the ERO to modify an approved Reliability Standard to address a specific matter if it considers this appropriate to carry out section 215 of the FPA.<sup>9</sup> Only Reliability Standards approved by the Commission will become mandatory and enforceable.

A Reliability Standard defines obligations or requirements of utilities and other entities that operate, plan and use the Bulk Power System in North America. Meeting these requirements helps ensure the reliable planning and operation of the Bulk Power System. Each NERC Reliability Standard details the purpose of the standard, the entities that must comply, the specific actions that constitute compliance, and how the standard will be measured.

Reliability Standards address aspects of the operation and planning of the bulk power system such as: real-time transmission operations, balancing load and generation, emergency operations, system restoration and blackstart, voltage control, cyber security, vegetation management, facility ratings, disturbance reporting, connecting facilities to the grid, certifying system operators, and personnel training. The Reliability Standards detail how the system should perform, but not how the system should be designed. Individual owners, operators and users of the bulk power system determine if the system should be expanded or changed, and how, in order to achieve the intent of the Standards.

**Reliability Standard NUC-001**

On October 16, 2008, the Commission issued a Final Rule approving NUC-001-1 (Nuclear Plant Interface Coordination) Reliability Standard developed by NERC. In addition, the Commission directed NERC to develop a modification to the Reliability Standard to address a specific concern, Requirement R9.3.5, to clarify the impact of the requirement on two important operating procedures, in response to the comments received. The Final Rule largely accepted the explanations and clarifications provided in the ERO's comments and addressed the positions raised by NERC and the other commenters on the specific issues raised in the NOPR. As proposed in the NOPR, the Final Rule did not take any action on the regional difference, because it applied outside of the United States and was not applicable to any facilities within the

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<sup>8</sup> 16 U.S.C.824o as implemented in 18 CFR 39.5(c)(1).

<sup>9</sup> Section 215(d)(5) of the FPA.

**FERC-725F, OMB Control No. 1902-0249  
(reflecting both Docket Nos. IC14-16-000 and RD14-13-000)  
(2/24/2015)**

Commission's jurisdiction.<sup>10</sup> The Final Rule directed modifications to the violation risk factors for the Reliability Standard. Finally, the Final Rule approved four related definitions for addition to the NERC Glossary of Terms, and directed various changes to proposed violation risk factors, which measure the potential impact of violations of the Reliability Standard on the reliability of the Bulk-Power System.

Revised Reliability Standard, NUC-001-2, was filed with the Commission by NERC in August 2009 and subsequently approved by the Commission on January 21, 2010<sup>11</sup>. The NUC-001-1 Reliability Standard was previously approved by the OMB on March 23, 2009 (ICR Reference Number 200810-1902-009, OMB Control Number: 1902-0249).

When the subsequent revised Reliability Standard (NUC-001-2) was approved, the Commission did not go to OMB for approval. It was assumed that the changes made did not substantively affect the information collection, so a formal submission to OMB was not needed.

NUC-001-3 Reliability Standard represents the implementation of recommendations made by the NERC Five Year Review Team to revise the NUC-001-2 standard. These revisions include clarifying and conforming changes to update the standard for current use of terminology, updated violation risk factors, and updated violation severity levels for the evaluation of any violations of the standard. This current ICR and submittal is to obtain a 3-year OMB clearance for the updated Reliability Standard NUC-001-3 [as implemented by Docket RD14-13], which is superseding NUC-001-2.<sup>12</sup>

The Reliability Standards implement the Congressional mandate of EPACT 2005 to develop mandatory and enforceable Reliability Standards to better ensure the reliability of the nation's Bulk-Power System. Specifically, the Nuclear Reliability Standard (NUC-001-3, FERC collection 725F) ensures that system operating limits (SOLs) used in the reliability planning and

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<sup>10</sup> NERC proposed to adopt as a regional difference for Canada a separate definition of nuclear plant licensing requirements that did not reference regulatory requirements for off-site power supply for safe plant shutdown because Canada did not have regulatory standards for off-site power comparable to those established by the U.S. Nuclear Regulatory Commission (NRC).

<sup>11</sup> 130 FERC ¶ 61,051, Docket No. RD09-10-000 Order Approving Reliability Standard

<sup>12</sup> Note that on 5/30/2014, NERC filed a motion to discontinue its compliance obligation to: (i) collect data and (ii) provide quarterly informational filings pursuant to the Commission's directive in Paragraph 629 of Order No. 693. NERC stated that one of the reasons to discontinue the compliance obligation was that the need had been superseded by the Reliability Standard NUC-001-2. On 7/10/2014, FERC approved (at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13590094>) NERC's request. [The burden of the NERC data collection and quarterly filing (part of a directive rather than a Standard) would have been part of the FERC-725, which covers the ERO application, as well as ERO's development, oversight and management of the Reliability Standards process.]

**FERC-725F, OMB Control No. 1902-0249  
(reflecting both Docket Nos. IC14-16-000 and RD14-13-000)  
(2/24/2015)**

operation of the Bulk-Power System are coordinated with nuclear licensing requirements to ensure the safe operation and shut down of nuclear power plants.

**2. HOW, BY WHOM, AND FOR WHAT PURPOSE THE INFORMATION IS TO BE USED AND THE CONSEQUENCES OF NOT COLLECTING THE INFORMATION**

NUC-001-2

Reliability Standard NUC-001-2 applies to nuclear plant generator operators and transmission entities, including off-site power suppliers and entities that provide distribution and transmission services that affect plant operations. NERC stated that the Reliability Standard meets the criteria that it apply to users, owners and operators of the Bulk-Power System because NUC-001-2 applies to transmission entities that are responsible for providing services relating to Nuclear Plant Interface Requirements (NPIR). According to NERC, these transmission entities can affect the safety and reliability of the nuclear plant and Bulk-Power System, e.g., in the case of a distribution service provider that supplies off-site power from a low-voltage, local distribution system. Therefore, these entities are subject to the Reliability Standard Requirements and may be registered under the NERC compliance registry process.

Reliability Standard NUC-001-2 requires nuclear plant generator operators and entities that provide generation, transmission and distribution services relating to off-site power (defined as “transmission entities”) to enter into interface agreements with nuclear plant generator operators that will govern certain communication, training, operational and planning elements for use in addressing generation and transmission system limits and nuclear licensing requirements. The Commission understands that most entities subject to this Reliability Standard already have such agreements in place. The responsible entities are also required to retain evidence that they executed such an agreement and incorporated its terms into systems planning and operations. Further, each nuclear plant generator operator and transmission entity must self-certify its compliance to the compliance monitor once every three years.

Reliability Standard NUC-001-2 does not require responsible entities to file information with the Commission. Nor, with the exception of a three year self-certification of compliance, does the Reliability Standard require responsible entities to file information with the ERO or Regional Entities. However, the Reliability Standard does require responsible entities to develop and maintain certain information for a specified period of time, subject to inspection by the ERO or Regional Entities.

NUC-001-3

The purpose of Reliability Standard NUC-001-3 is to update the verbiage from the NUC-001-2 standard for current use of terminology implemented in other areas of the Reliability Standards, to update the violation risk factors, and to update the violation severity levels as applicable to

**FERC-725F, OMB Control No. 1902-0249  
(reflecting both Docket Nos. IC14-16-000 and RD14-13-000)  
(2/24/2015)**

these standards. The changes resulting from NUC-001-3 do not affect either reporting or record-keeping compliance issues in the standard and, thus, has no effect on associated burden, as already stated for NUC-001-2.

**3. DESCRIBE ANY CONSIDERATION OF THE USE OF IMPROVED TECHNOLOGY TO REDUCE BURDEN AND TECHNICAL OR LEGAL OBSTACLES TO REDUCING BURDEN.**

Reliability Standard NUC-001-2 and the NUC-001-3 superseding it do not require information to be filed with the Commission. However, it does contain information collection requirements for which using current technology is an option.

**4. DESCRIBE EFFORTS TO IDENTIFY DUPLICATION AND SHOW SPECIFICALLY WHY ANY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED OR MODIFIED FOR USE FOR THE PURPOSE(S) DESCRIBED IN INSTRUCTION NO. 2**

Filing requirements are periodically reviewed as OMB review dates arise or as the Commission may deem necessary in carrying out its responsibilities under the FPA in order to eliminate duplication and ensure that filing burden is minimized. There are no similar sources of information available that can be used or modified for these reporting purposes.

**5. METHODS USED TO MINIMIZE BURDEN IN COLLECTION OF INFORMATION INVOLVING SMALL ENTITIES**

This Reliability Standard does not contain provisions for minimizing the burden of the collection for small entities. All the requirements in the Reliability Standard apply to every applicable entity, be it large or small. The universe of users, owners, and operators established this standard through a collaborative process with no special provisions for small entities.<sup>13</sup>

**6. CONSEQUENCE TO FEDERAL PROGRAM IF COLLECTION WERE CONDUCTED LESS FREQUENTLY**

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<sup>13</sup>In general for Reliability Standards, small entities subject to a given Reliability Standard can reduce their burden by taking part in a joint registration organization or a coordinated function registration. These options allow an entity to share its compliance burden with other similar entities. Detailed information regarding these options are available in NERC's Rules of Procedure at sections 507 and 508 (available at [http://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/NERC\\_ROP\\_Effective\\_20140701\\_updated\\_20140602.pdf](http://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/NERC_ROP_Effective_20140701_updated_20140602.pdf).)

**FERC-725F, OMB Control No. 1902-0249  
(reflecting both Docket Nos. IC14-16-000 and RD14-13-000)  
(2/24/2015)**

The NUC-001-2 Reliability Standard and the NUC-001-3 Reliability Standard superseding it require the Nuclear Plant Generator Operators and Transmission Entities to which they interconnect to execute and implement interface agreements for coordinating operations to meet nuclear licensing requirements. These agreements must incorporate NPIRs into their operating analyses of the Bulk Electric System (BES) and operate the Transmission system to comply with the NPIRs. The lack of these agreements or compliance to these agreements can bring about lack of coordination of operations between a nuclear plant and its transmission entities. This lack of communication between entities can lead to an unanticipated separation from the Bulk Power System (BPS) placing the BPS at risk and defeating the goal of the Commission as mandated by Title XII, Subtitle A, of EPACT 2005.

Periodic revisions and strict compliance to these agreements are the means by which the ERO and Regional Entities ensure the reliability of the BPS and provide an assessment to FERC of the long-term reliability of the BPS to make recommendations as needed.

Therefore, if the NUC-001-2 and superseding NUC-001-3 Reliability Standard required the information collection requirements less frequently or not all, it would be detrimental to the BPS.

**7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE  
INFORMATION COLLECTION**

Some of the record keeping requirements in the Reliability Standard may require entities to maintain records for a period that exceeds OMB guidelines in 5 CFR 1320.5(d)(2)(iv) of not retaining records for longer than three years. Specifically, the Reliability Standard requires entities to document and/or keep data or evidence to show compliance as identified (in the “Measures” below) unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

**M1.** The Nuclear Plant Generator Operator shall, upon request of the Compliance Enforcement Authority, provide a copy of the transmittal and receipt of transmittal of the proposed NPIRs to the responsible Transmission Entities.

**M2.** The Nuclear Plant Generator Operator and each Transmission Entity shall each have a copy of the currently effective Agreement(s) which document how the Nuclear Plant Generator Operator and the applicable Transmission Entities address and implement the NPIRs available for inspection upon request of the Compliance Enforcement Authority.

**M3.** Each Transmission Entity responsible for planning analyses in accordance with the Agreement shall, upon request of the Compliance Enforcement Authority, provide a copy of the planning analyses results transmitted to the Nuclear Plant Generator

**FERC-725F, OMB Control No. 1902-0249  
(reflecting both Docket Nos. IC14-16-000 and RD14-13-000)  
(2/24/2015)**

Operator, showing incorporation of the NPIRs. The Compliance Enforcement Authority shall refer to the Agreements developed in accordance with this standard for specific requirements.

M4. Each Transmission Entity responsible for operating the electric system in accordance with the Agreement shall demonstrate or provide evidence of the following, upon request of the Compliance Enforcement Authority:

The NPIRs have been incorporated into the current operating analysis of the electric system. (Requirement 4.1)

The electric system was operated to meet the NPIRs. (Requirement 4.2)

The Transmission Entity informed the Nuclear Plant Generator Operator when it became aware it lost the capability to assess the operation of the electric system affecting the NPIRs. M5. The Nuclear Plant Generator Operator shall, upon request of the Compliance Enforcement Authority, demonstrate or provide evidence that the nuclear power plant is being operated consistent with the NPIRs.

M6. The Transmission Entities and Nuclear Plant Generator Operator shall, upon request of the Compliance Enforcement Authority, provide evidence of the coordination between the Transmission Entities and the Nuclear Plant Generator Operator regarding outages and maintenance activities which affect the NPIRs.

M7. The Nuclear Plant Generator Operator shall provide evidence that it informed the applicable Transmission Entities of changes to nuclear plant design (e.g., protective relay setpoints), configuration, operations, limits, or capabilities that may impact the ability of the Transmission Entities to meet the NPIRs.

M8. The Transmission Entities shall each provide evidence that the entities informed the Nuclear Plant Generator Operator of changes to electric system design (e.g., protective relay setpoints), configuration, operations, limits, or capabilities that may impact the ability of the Nuclear Plant Generator Operator to meet the NPIRs.

M9. The Nuclear Plant Generator Operator shall have a copy of the Agreement(s) addressing the elements in Requirement 9 available for inspection upon request of the Compliance Enforcement Authority. Each Transmission Entity shall have a copy of the Agreement(s) addressing the elements in Requirement 9 for which it is responsible available for inspection upon request of the Compliance Enforcement Authority.

The Data Retention requirements state:

The Responsible Entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:

- For Measure 1, the Nuclear Plant Generator Operator shall keep its latest transmittals and receipts.
- For Measure 2, the Nuclear Plant Generator Operator and each Transmission Entity shall have its current, in-force Agreement.



**FERC-725F, OMB Control No. 1902-0249  
(reflecting both Docket Nos. IC14-16-000 and RD14-13-000)  
(2/24/2015)**

- For Measure 3, the Transmission Entity shall have the latest planning analysis results.
- For Measures 4, 6 and 8, the Transmission Entity shall keep evidence for two years plus current.
- For Measures 5, 6 and 7, the Nuclear Plant Generator Operator shall keep evidence for two years plus current.

If a Responsible Entity is found non-compliant it shall keep information related to the noncompliance until found compliant.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

[The Compliance Enforcement Authority is the Regional Entity.]

**8. DESCRIBE EFFORTS TO CONSULT OUTSIDE THE AGENCY: SUMMARIZE PUBLIC COMMENTS AND THE AGENCY'S RESPONSE TO THESE COMMENTS**

The ERO process to establish Reliability Standards is a collaborative process with the ERO, Regional Entities and others developing and reviewing drafts, and providing comments, with the final proposed standard submitted to the FERC for review and approval.<sup>14</sup>

In addition, FERC issued a public notice pertaining to the 3-year renewal request for NUC-001-2 Reliability Standard (in Docket No. IC14-16) on 9/30/2014,<sup>15</sup> published in the Federal Register, thereby providing public utilities and licensees, state commissions, Federal agencies, and other interested parties an opportunity to submit data, views, comments or suggestions concerning the collection of data. No comments were received in response to the notices.

Additionally, FERC issued a public notice pertaining to NUC-001-3 Reliability Standard (in Docket No. RD14-13) on 11/13/2014<sup>16</sup>, published in the Federal Register, thereby providing public utilities and licensees, state commissions, Federal agencies, and other interested parties

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<sup>14</sup>Details of the ERO standards development process are available on the NERC website at [http://www.nerc.com/docs/standards/sc/Standard Processes Manual Approved May 2010.pdf](http://www.nerc.com/docs/standards/sc/Standard_Processes_Manual_Approved_May_2010.pdf).

<sup>15</sup>The 60-day Notice is posted in FERC's eLibrary at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13646934> (79 FR 61068, 10/9/2014). The 30-day notice is posted at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13753724> (80 FR 6067); an errata notice is posted at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13769926>.

<sup>16</sup>The notice is posted in FERC's eLibrary at [http://elibrary.ferc.gov/idmws/file\\_list.asp?document\\_id=14270267](http://elibrary.ferc.gov/idmws/file_list.asp?document_id=14270267) (79 FR 69450, 11/21/2014). A 30-day Notice, issued 2/9/2015, is posted at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13767855> ((80 FR 8299).

**FERC-725F, OMB Control No. 1902-0249  
(reflecting both Docket Nos. IC14-16-000 and RD14-13-000)  
(2/24/2015)**

an opportunity to submit data, views, comments or suggestions concerning the collection of data. No comments were received in response to the notices.

**9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS**

The Commission does not make payments or provide gifts for respondents related to this collection.

**10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS**

Responding entities do not submit the information collected or retained (to show compliance with the Reliability Standards) to FERC. Rather, they submit the information to NERC, the regions, or maintain it internally. Since there are no submissions made to FERC, FERC provides no specific provisions in order to protect confidentiality.

According to the NERC Rule of Procedure section 1502<sup>17</sup>, "...a Receiving Entity shall keep in confidence and not copy, disclose, or distribute any Confidential Information or any part thereof without the permission of the Submitting Entity, except as otherwise legally required." This serves to protect confidential information submitted to NERC or Regional Entities.

**11. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE, SUCH AS SEXUAL BEHAVIOR AND ATTITUDES, RELIGIOUS BELIEFS, AND OTHER MATTERS THAT ARE COMMONLY CONSIDERED PRIVATE.**

This collection does not include any questions of a sensitive nature.

**12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION**

The current reporting and record retention requirements are not changing. Furthermore, the reporting and record retention requirements will not change after the implementation of the NUC-001-3 Reliability Standard, the subsequent version of the currently approved standard. The estimates for responses and burden hours follow.

	<b>Total Request</b>	<b>Previously Approved</b>	<b>Change due to Adjustment in Estimate</b>	<b>Change Due to Agency Discretion</b>
<b>FERC-725F</b>				

<sup>17</sup> Section 1502, Paragraph 2, available at NERC's website ([http://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/NERC\\_ROP\\_Effective\\_20140701\\_updated\\_20140602%20\(updated\).pdf](http://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/NERC_ROP_Effective_20140701_updated_20140602%20(updated).pdf)).

**FERC-725F, OMB Control No. 1902-0249  
(reflecting both Docket Nos. IC14-16-000 and RD14-13-000)  
(2/24/2015)**

Annual Number of Responses	420	420	0	0
Annual Time Burden (Hr.)	64,240	64,240	0	0
Annual Cost Burden (\$)	\$2,181	\$2,181	0	0

The Commission estimates that the total universe of respondents for this collection is 143 unique entities.<sup>18</sup> This includes 26 unique owners of nuclear facilities and 117 transmission entities that provide services related to NPIRs. FERC also estimated that there are 65 unique nuclear plant sites involved in this collection. In order to estimate the burden the Commission considered two categories: establishing new agreements; and making modifications to existing agreements.

The Commission assumes there may be as many as 10 new agreements established each year. Because applicable entities should already be in compliance with NUC-001-2 (meaning that all nuclear sites should already have agreements in place), new agreements would only come about due to company mergers or new interconnections between nuclear plant sites and other entities. FERC further assumes that each agreement involves one nuclear plant site and an average of two transmission entities.

For modifications to existing agreements, the Commission assumes that each nuclear plant site will be required to make up to two modifications a year to existing agreements. Because the Commission assumes that each agreement involves an average of two transmission entities, the burden for this category also includes two transmission entities per nuclear plant site (or 130 in

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<sup>18</sup>The NUC-001-3 Reliability Standard is applicable to:

- 4.1. Functional Entities:
  - 4.1.1 Nuclear Plant Generator Operators.
- 4.2. Transmission Entities shall mean all entities that are responsible for providing services related to Nuclear Plant Interface Requirements (NPIRs). Such entities may include one or more of the following:
  - 4.2.1 Transmission Operators.
  - 4.2.2 Transmission Owners.
  - 4.2.3 Transmission Planners.
  - 4.2.4 Transmission Service Providers.
  - 4.2.5 Balancing Authorities.
  - 4.2.6 Reliability Coordinators.
  - 4.2.7 Planning Coordinators.
  - 4.2.8 Distribution Providers.
  - 4.2.9 Load-Serving Entities.
  - 4.2.10 Generator Owners.
  - 4.2.11 Generator Operators.

**FERC-725F, OMB Control No. 1902-0249  
(reflecting both Docket Nos. IC14-16-000 and RD14-13-000)  
(2/24/2015)**

total). FERC estimates that some of these transmission entities are involved in multiple agreements (as stated above, the number of unique transmission entities is estimated at 117).

The Commission’s detailed estimates for the Public Reporting Burden follow.

<b>FERC-725F Data Collection<sup>19</sup></b>	<b>Number of Respondents Annually (1)</b>	<b>Number of Responses Per Respondent (2)</b>	<b>Average Burden Hours Per Response (3)</b>	<b>Total Annual Burden Hours (1)x(2)x(3)</b>
New agreements	10 nuclear operators + 20 transmission entities	1	Reporting: 1,080	Reporting: 32,400
			Recordkeeping: 108	Recordkeeping: 3,240
Modifications to agreements	65 nuclear plants + 130 transmission entities	2	Reporting: 66.67	Reporting: 26,000
			Recordkeeping: 6.67	Recordkeeping: 2,600
<b>Totals</b>	(see text for discussion)			<b>Reporting</b> 58,400
				<b>Recordkeeping</b> 5,840

Total Estimate Annual Burden Hours: (Reporting 58,400 hours + Recordkeeping 5,840 hours) = 64,240 hours.

Total Estimated Annual Responses:  $\{[(10+20)*1]+[(65+130)*2]\} = 420$

The Commission believes that this estimate is conservative because most, if not all of the applicable entities currently have interface agreements in place to provide for coordination between a nuclear plant generator operator and its local transmission, distribution and off-site power suppliers. Furthermore, multiple plants are located on certain sites, and one entity may operate multiple plants, providing for potential economies in updating, drafting and executing the interface agreements.

As noted earlier in this document, NUC-001-2 is being superseded by NUC-001-3. The changes from NUC-001-2 to NUC-001-3 are clarifying in nature and have no effect on either reporting or record-keeping requirements. As such, the public reporting proposed in the above remains

<sup>19</sup> Refers to the renewal of NUC-001-2 and the implementation of NUC-001-3 (which replaces NUC-001-2). The reason why only one table is present is because there is only one NUC standard and the reporting/recordkeeping burden for Versions 2 and 3 is identical.

**FERC-725F, OMB Control No. 1902-0249  
(reflecting both Docket Nos. IC14-16-000 and RD14-13-000)  
(2/24/2015)**

applicable even after the implementation of NUC-001-3 due to the order in RD14-13-000.

**13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS**

The Commission projects the average annualized record storage for both the NUC-001-2 and the superseding NUC-001-3 Reliability Standard cost to be:

143 entities x \$15.25/year/entity<sup>20</sup> = \$2,181 (rounded).

All other costs are related to burden hours and are discussed in Question 15.

**14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT**

The Regional Entities and NERC do most of the data processing, monitoring and compliance work for Reliability Standards, is covered under FERC-725 collection (OMB Control No. 1902-0225) and is not part of this request or package. Any involvement by the Commission is covered under the FERC-725 collection (OMB Control No. 1902-0225) and is not part of this request or package.

The Commission does incur the costs associated with obtaining OMB clearance under the Paperwork Reduction Act for this collection. FERC estimates \$5,092 as the annual cost for each collection.

**15. REASONS FOR CHANGES IN BURDEN INCLUDING THE NEED FOR ANY INCREASE**

The burden associated with the new, revised standard NUC-001-3 (under Docket RD14-13-000) is identical to the burden previously associated with NUC-001-2. There is no change in the burden from the NUC-001-2 to NUC-001-3 since the revisions are clarifying in nature and do not pertain to reporting nor record-keeping requirements.

**16. TIME SCHEDULE FOR THE PUBLICATION OF DATA**

There are no data published as a result of this collection.

**17. DISPLAY OF THE EXPIRATION DATE**

The expiration date is displayed in a table posted on ferc.gov at <http://www.ferc.gov/docs-filing/info-collections.asp>.

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<sup>20</sup>This is based on the estimated cost to service and store 1 GB of data (based on the aggregated cost of an IBM advanced data protection server).

**FERC-725F, OMB Control No. 1902-0249  
(reflecting both Docket Nos. IC14-16-000 and RD14-13-000)  
(2/24/2015)**

**18. EXCEPTIONS TO THE CERTIFICATION STATEMENT**

The Commission does not use statistical methods for this collection. Therefore, the Commission does not certify that the collection uses statistical methods.