

Undertaking 89

RE: Canvassing of other utilities to see if that was a standard procedure to put technicians in semi-remote locations when bad weather was called for.

- a) Undertake to provide whether there was any inquiry from other utilities as to whether that was standard practice in other jurisdictions?
- b) Mr Moore offered to provide details of North American Electrical Reliability Council type standards, for preparation and response to storms and compare against what (*Hydro was*) were doing.
- c) Provide any documentation related to what other utilities in North America were doing.

(a) – (c)

Hydro's current severe weather preparedness protocol was developed taking account of the attached NERC guidelines (Undertaking 89, Attachment 1), which reflects best practices of North American utilities. Hydro's current protocol is utilized for all generation, transmission, and distribution operations. Hydro continues to review and test its severe weather preparedness protocol on a regular basis to ensure improvements are implemented.

Prior to implementation of Hydro's current protocol, Hydro's standard procedure was to put applicable staff in semi-remote locations in which Hydro had previous experience with difficulty of access, being islanded communities requiring ferry access or remote locations requiring helicopter access. For other locations, Hydro arranged for appropriate staff to be equipped with a corporate four-wheel drive vehicle in advance of a storm, to access potentially affected facilities in their area. In addition, Hydro has had a shared services agreement for a number of years with Newfoundland Power to ensure maximum resource levels are available for customers during severe weather events.

Reliability Guideline

Generating Unit Winter Weather Readiness – Current Industry Practices

Preamble:

It is in the public interest for NERC to develop guidelines that are useful for maintaining or enhancing the reliability of the bulk power system (BPS). Reliability Guidelines provide suggested guidance on a particular topic for use by BPS users, owners, and operators according to each entity's circumstances. Reliability Guidelines are not to be used to provide binding norms, establish mandatory reliability standards, or create parameters by which compliance to standards is monitored or enforced.

Purpose:

This Reliability Guideline is applicable to electricity sector organizations responsible for the operation of the BPS. Although this guideline was developed as a result of an unusual cold weather event in an area not normally exposed to freezing temperatures, it provides a general framework for developing an effective winter weather readiness program for generating units throughout North America. The focus is on maintaining individual unit reliability and preventing future cold weather related events. This document is a collection of industry practices compiled by the NERC Operating Committee (OC). While the incorporation of these practices is strictly voluntary, developing a winter weather readiness program using these practices is highly encouraged to promote and achieve the highest levels of reliability for these high impact weather events.

Assumptions:

- A. Each BPS generation owner and operator is responsible and accountable for maintaining generating unit reliability.
- B. Entities should develop and apply plant-specific winter weather readiness plans, as appropriate, based on factors such as geographical location, technology and plant configuration.

Guideline Details:

An effective winter weather readiness program, which includes severe winter weather event preparedness, should generally address the following components: (I) Safety; (II) Management Roles and Expectations; (III) Processes and Procedures; (IV) Evaluation of Potential Problem Areas; (V) Testing; (VI) Training; and (VII) Communications. This program will be referred to hereafter as a winter weather preparation procedure.

I. Safety

Safety remains the top priority during winter weather events. Job safety briefings should be conducted during preparation for and in response to these events.

II. Management Roles and Expectations

Management plays an important role in maintaining effective winter weather programs. The management roles and expectations below provide a high-level overview of the core management responsibilities related to winter weather preparation. Each entity should tailor these roles and expectations to fit within their own corporate structure.

A. Senior Management

- 1) Set expectations for safety, reliability, and operational performance.
- 2) Ensure that a winter weather preparation procedure exists for each operating location.
- 3) Consider a fleet-wide annual winter preparation meeting, training exercise, or both to share best practices and lessons learned.
- 4) Share insights across the fleet and through industry associations (formal groups or other informal networking forums).

B. Plant Management

- 1) Develop a winter weather preparation procedure and consider appointing a designee responsible for keeping this procedure updated with industry identified best practices and lessons learned.
- 2) Ensure the site specific winter weather preparation procedure includes processes, staffing plans, and timelines that direct all key activities before, during and after severe winter weather events.
- 3) Ensure proper execution of the winter weather preparation procedure.
- 4) Conduct a plant readiness review prior to an anticipated severe winter weather event.
- 5) Encourage plant staff to look for areas at risk due to winter conditions and bring up opportunities to improve readiness and response.
- 6) Following each winter, conduct an evaluation of the effectiveness of the winter weather preparation procedure and incorporate lessons learned.

III. Processes and Procedures

A winter weather preparation procedure should be developed for seasonal winter preparedness. Components of an effective winter weather preparation procedure are included as Attachment 1.

After a severe winter weather event, entities should utilize a review process to formally recognize strengths in the program, evaluate improvement opportunities, and identify lessons learned. Procedures should be reviewed and updated using these lessons learned after every winter event to institutionalize knowledge from prior events. Changes to the procedure and lessons learned should be communicated to the appropriate personnel.

IV. Evaluation of Potential Problem Areas

Identify and prioritize components, systems, and other areas of vulnerability which may experience freezing problems or other cold weather operational issues.

- A. This includes equipment that has the potential to:
- 1) Initiate an automatic unit trip,
 - 2) Impact unit start-up,
 - 3) Initiate automatic unit runback schemes and/or cause partial outages,
 - 4) Cause damage to the unit,
 - 5) Adversely affect environmental controls that could cause full or partial outages,
 - 6) Adversely affect the delivery of fuel or water to the units,
 - 7) Cause other operational problems such as slowed or impaired field devices, or
 - 8) Create a weather related safety hazard
- B. Based on previous cold weather events, a list of typical problem areas are identified below. This is not meant to be an all inclusive list. Individual entities should review their plant design and configuration, identify areas with potential exposure to the elements, ambient temperatures, or both and tailor their plans to address them accordingly.
- 1) Level transmitters
 - i. Drum level transmitters and sensing lines
 - ii. Condensate tank level transmitters and sensing lines
 - iii. De-aerator tank level transmitters and sensing lines
 - iv. Hotwell level transmitters and sensing lines
 - v. Fuel oil tank level transmitters / indicators
 - 2) Pressure Transmitters
 - i. Gas turbine combustor pressure transmitters and sensing lines
 - ii. Feed water pump pressure transmitters and sensing lines
 - iii. Condensate pump pressure transmitters and sensing lines
 - iv. Steam pressure transmitters and sensing lines
 - 3) Flow Transmitters
 - i. Steam flow transmitters and sensing lines
 - ii. Feed water pump flow transmitters and sensing lines
 - iii. High pressure steam attemperator flow transmitters and sensing lines
 - 4) Instrument Air System
 - 5) Motor-Operated Valves, Valve Positioners, and Solenoid Valves
 - 6) Drain Lines, Steam Vents, and Intake Screens

- 7) Water Pipes and Fire Suppression Systems¹
 - i. Low/no water flow piping systems
 - 8) Fuel Supply and Ash Handling
 - i. Coal piles and coal handling equipment
 - ii. Transfer systems for backup fuel supply
 - iii. Gas supply regulators, other valves and instrumentation (may require coordination with gas pipeline operator)
 - iv. Ash disposal systems and associated equipment
- C. Potential vulnerabilities associated with emergency generators, including Blackstart generators, should be evaluated when developing the site specific winter weather preparation procedure as they may provide critical system(s) backup.

V. Testing

In addition to the typical problem areas identified above, emphasis should be placed on the testing of low frequency tasks such as startup of emergency generators, where applicable.

VI. Training

Coordinate annual training in winter specific and plant specific awareness and maintenance training. This may include response to freeze protection panel alarms, troubleshooting and repair of freeze protection circuitry, identification of plant areas most affected by winter conditions, review of special inspections or rounds implemented during severe weather, fuel switching procedures, knowledge of the ambient temperature for which the freeze protection system is designed, and lessons learned from previous experiences or the NERC Lessons Learned program.

- A. Consider holding a winter readiness meeting on an annual basis to highlight preparations and expectations for severe cold weather.
- B. Operations personnel should review cold weather scenarios affecting instrumentation readings, alarms, and other indications on plant control systems.
- C. Ensure appropriate NERC Generation Availability Data Systems (GADS) coding for unit derates or trips as a result of a severe winter weather events to promote lessons learned, knowledge retention, and consistency. Examples may include NERC GADS code 9036 "Storms (ice, snow, etc.)" or code 9040 "Other Catastrophe."

VII. Winter Event Communications

Clear and timely communication is essential to an effective program. Key communication points should include the following:

¹ For safety reasons, fire protection systems should also be included in this identification process. These problem areas should be noted in the site specific winter weather preparation procedure.

- A. Before a severe winter weather event, plant management should communicate with their appropriate senior management that the site specific winter weather preparation procedure, checklists, and readiness reviews have been completed.
- B. Before and during a severe winter weather event, communicate with all personnel about changing conditions and potential areas of concern to heighten awareness around safe and reliable operations.
- C. Before and during a severe winter weather event, the affected entity(ies) will keep the Balancing Authority up to date on changes to plant availability, capacity, or other operating limitations. Depending on regional structure and market design, notification to the Reliability Coordinator and Transmission Operator may also be necessary.
- D. After a generating plant trip, derate, or failure to start due to severe winter weather, Plant Management, as appropriate, should conduct an analysis, develop lessons learned, and incorporate good industry practices.
 - 1) This process should include a feedback loop to enhance current winter weather readiness programs, processes, procedures, checklists and training (continuous improvement).
 - 2) Sharing of technical information and lessons learned through the NERC Event Analysis Program or some other method is encouraged.

Related Documents and Links:

1. [Report on Outages and Curtailments during the Southwest Cold Weather Event of February 1-5, 2011](#), dated August 2011, Federal Energy Regulatory Commission and North American Electric Reliability Corporation
2. [Winter Weather Readiness for Texas Generators](#), dated April 13, 2011, Calpine, CPS Energy, LCRA, Luminant, and NRG Energy
3. [Electric Reliability Organization Event Analysis Process](#), dated February 2012, ERO Event Analysis Process and associated [Lessons Learned](#)
4. [Previous Cold Weather Reports](#)²

Revision History:

Date	Version Number	Reason/Comments
12/03/2012	1.0	Initial Version – <i>Winter Weather Readiness</i>

² <http://www.nerc.com/page.php?cid=5|385>

Attachment 1

Elements of a Winter Weather Preparation Procedure³

This Attachment provides some key points to address in each of the winter weather preparation procedure elements, including severe winter weather event preparedness. These are not all inclusive lists. Individual entities should review their plant design and configuration, identify areas with potential exposure to the elements, ambient temperatures, or both, and tailor their plans to address them accordingly.

A. Work Management System

- 1) Review Work Management System to ensure adequate annual preventative work orders exist for freeze protection, winter weather preparedness, or both.
- 2) Ensure all freeze protection, winter weather preparedness preventative work orders, or both are completed prior to the onset of the winter season.
- 3) Review Work Management System for open corrective maintenance items that could affect plant operation and reliability in winter weather and ensure that they are completed prior to the onset of the winter season.
- 4) As appropriate to your climate, suspend freeze protection measures and remove freeze protection equipment after the last probable freeze of the winter. This may be a plant specific date established by senior management.
- 5) Ensure all engineered modification and construction activities are performed such that the changes maintain winter readiness for the plant. Newly built plants or engineered modifications can be more susceptible to winter weather.

B. Critical Instrumentation and Equipment Protection

- 1) Ensure all critical site specific problem areas (as noted above in section III. Evaluation of Potential Problem Areas) have adequate protection to ensure operability during a severe winter weather event. Emphasize the points in the plant where equipment freezing would cause a generating plant trip, derate, or failure to start.
- 2) Develop a list of critical instruments and transmitters that require increased surveillance during severe winter weather events.

C. Insulation, Heat Trace, and Other Protection Options – Ensure processes and procedures verify adequate protection and necessary functionality (by primary or alternate means) before and during winter weather. Consider the effect of wind chill when applying freeze protection. Considerations include but are not limited to:

³ Plants that will remain offline during the winter season would not need to perform winterization preparations unless it is necessary for asset protection/preservation.

- 1) Insulation thickness, quality and proper installation
 - i. Verify the integrity of the insulation on critical equipment identified in the winter weather preparation procedure. Following any maintenance, insulation should be re-installed to original specifications.
 - 2) Heat trace capability and electrical continuity/ground faults
 - i. Perform a complete evaluation of all heat trace lines, heat trace power supplies (including all breakers, fuses, and associated control systems) to ensure they maintain their accuracy. This inspection may include checking for loose connections, broken wires, corrosion, and other damage to the integrity of electrical insulation which could lead to the heat trace malfunctioning. Measure heat trace amperage and voltage, if possible, to determine whether the circuits are producing the design output. If there are areas where heat tracing is not functional, an alternate means of protection should be identified in the winter weather preparation procedure.
 - ii. Evaluation of heat trace and insulation on critical lines should be performed during new installation, during regular maintenance activities, or if damage or inappropriate installation is identified (i.e., wrapped around the valve and not just across the valve body).
 - iii. Re-install removed or disturbed heat tracing following any equipment maintenance to restore heat tracing integrity and equipment protection.
 - iv. Update and maintain all heat tracing circuit drawings and labeling inside cabinets.
 - 3) Wind breaks
 - i. Install permanent or temporary wind barriers as deemed appropriate to protect critical instrument cabinets, heat tracing and sensing lines.
 - 4) Heaters and Heat Lamps
 - i. Ensure operation of all permanently mounted and portable heaters.
 - ii. Evaluate plant electrical circuits to ensure they have enough capacity to handle the additional load. Circuits with Ground Fault Interrupters (GFIs) should be continuously monitored to make sure they have not tripped due to condensation.
 - iii. Fasten heaters and heat lamps in place to prevent unauthorized relocation.
 - 5) Covers, Enclosures, and Buildings
 - i. Install a box or enclosure with inside heat for some transmitters.
 - ii. Install covers on valve actuators to keep the actuator from accumulating ice.
 - iii. Inspect building penetrations, windows, doors, fan louvers, and other openings for potential exposure of critical equipment to the elements.
- D. Supplemental equipment – Prior to the onset of the winter season, ensure adequate inventories of all commodities, equipment and other supplies that would aid in severe winter weather event preparation or response, and that they are readily available to plant staff. Supplemental equipment might include:

- 1) Tarps
 - 2) Portable heaters, heat lamps, or both
 - 3) Scaffolding
 - 4) Blankets
 - 5) Extension cords
 - 6) Kerosene/propane
 - 7) Temporary enclosures
 - 8) Temporary insulation
 - 9) Plastic rolls
 - 10) Portable generators
 - 11) Portable lighting
 - 12) Instrumentation tubing
 - 13) Handheld welding torches
 - 14) Ice removal chemicals and equipment
 - 15) Snow removal equipment
 - 16) Cold weather Personal Protective Equipment (PPE) as appropriate to the respective regions
- E. Operational supplies – Prior to the onset of a severe winter weather event, conduct an inventory of critical supplies needed to keep the plant operational. Appropriate deliveries should be scheduled based on the severity of the event, lead times, etc. Operational supplies might include:
- 1) Aluminum Sulfate
 - 2) Anhydrous Ammonia
 - 3) Aqueous Ammonia
 - 4) Carbon Dioxide
 - 5) Caustic Soda
 - 6) Chlorine
 - 7) Diesel Fuel
 - 8) Ferric Chloride
 - 9) Gasoline (Unleaded)
 - 10) Hydrazine
 - 11) Hydrogen
 - 12) Lighter Oil (#2 Diesel)
 - 13) Sulfuric Acid

14) Calibration Gases

15) Lubricating Oils

16) Welding Supplies

17) Limestone

F. Staffing

- 1) Consider enhanced staffing (24x7) during severe winter weather events.
- 2) Arrange for lodging and meals as needed.
- 3) Arrange for transportation as needed.
- 4) Arrange for support and appropriate staffing from responsible entity for plant switchyard to ensure minimal line outages.

G. Communications

- 1) Ensure appropriate communication protocols are followed during a severe winter weather event.
- 2) Identify a back-up communication option in case the primary system is not working (i.e. satellite phone).
- 3) Ensure communication is discussed as part of the job safety briefing during a severe winter weather event.

H. Special Operations Instruction (just prior to or during a severe winter weather event)

- 1) Consider employing the “buddy system” during severe winter weather events to promote personnel safety.
- 2) Institute operator rounds utilizing cold weather checklists to verify critical equipment is protected – i.e. pumps running, heaters operating, igniters tested, barriers in place, temperature gauges checked, etc.
 - i. Monitor room temperatures, as required. Instrumentation and equipment in enclosed spaces (e.g. pump rooms) can freeze.
- 3) Test dual fuel capability and ensure adequate fuel supply (where applicable).
- 4) Consider pre-warming, early start-up, or both of scheduled units prior to a forecasted severe winter weather event.
- 5) Run emergency generators immediately prior to severe winter weather events to help ensure availability. Review fuel quality and quantity.
- 6) Place in service critical equipment such as intake screen wash systems, cooling towers, auxiliary boilers, and fuel handling equipment where freezing weather could adversely impact operations or forced outage recovery.