

WHAT AUDITORS ACTUALLY ASK FOR

THE FINDING THAT ISN'T YOUR HEAT TRACE

In a regional audit, it's rarely the **existence** of freeze protection that becomes the finding — it's the **documentation**. This is what an NPCC auditor asks a generator to produce for cold-weather-critical systems, and why a visual inspection can't produce it. It's the gap we find most often, even at plants whose heat trace is physically fine.

THE THREE ASKS

01 The as-built record

Every cold-weather-critical circuit **identified, located, and current** — circuit IDs, panel assignments, what each one protects. If the field changed and the record didn't, that gap is the finding.

02 Insulation-resistance results — with dates

Megger readings per circuit, **dated, retained, and trending** season over season. "We tested it" without dates doesn't survive an audit; a reading with no history hides the drift that matters.

03 A named responsible party

A **person, not a department**, assigned to the freeze-protection program — with cold-weather training documented for the crew that owns it.

WHY A VISUAL WALK CAN'T PRODUCE THIS

A heat-trace circuit doesn't fail visibly. Insulation resistance drifts toward zero, a connection corrodes under the lagging, a controller slips out of band — none of it shows on a walk-by. **You can't document a condition you can't see.** Evidence takes a meter.

THE CLOCKS THE STANDARD SETS

Oct 1, 2025	Annual	24 mo	48 mo
EOP-012-3 STANDARD IN EFFECT	INSPECTION + DOCUMENTATION DUTY — NOW	TO FIX EXISTING FREEZE PROTECTION	TO ADD NEW FREEZE PROTECTION

The 24- and 48-month clocks run from the day a plant **completes its Corrective Action Plan** (Requirement R7). Units entering commercial operation on or after **October 1, 2027** must be protected at their Extreme Cold Weather Temperature from day one (Requirement R2). The annual duties apply to every registered unit now.

A practical field reference drawn from assessment work at Northeast generating facilities — not compliance advice. Your regional entity's audit approach and the current standard language govern. Standard text: nerc.com, EOP-012-3. Updated September 2026.