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 STN-50-529 Palo Verde Nuclear Station, Unit 2, Arizona Publi 05000529
 STN-50-530 Palo Verde Nuclear Station, Unit 3, Arizona Publi 05000530

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 LEVINE, J.M. Arizona Public Service Co. (formerly Arizona Nuclear Power
 RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Requests proposed code alternative IAW 10CFR50.55a(e) (3), as acceptable alternative to requirements of 10CFR50.55a(e) (1), for installation of in-line safety-related flow measurement instrument in ASME Class 3 pipe.

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102-04256-JML/AKK/RKB
March 5, 1999

Reference: Letter 102-04138 dated June 25, 1998, from J. M. Levine, APS, to
USNRC.

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Supplemental Information Related to Requested Code
Alternative to ASME Section III Class 3 Requirements for
Installation of Safety-Related Flow Measurement
Instrumentation**

In the above referenced letter, Arizona Public Service Company (APS) requested NRC approval of a proposed code alternative in accordance with the provisions of 10 CFR 50.55a (a)(3). APS hereby submits this letter to clarify the request made in the above reference. Specifically, APS is requesting the proposed code alternative in accordance with 10 CFR 50.55a (a)(3), as an acceptable alternative to the requirements of 10 CFR 50.55a (e)(1), for the installation of an in-line safety-related flow measurement instrument in an ASME Class 3 pipe. Additionally, APS has performed an evaluation in accordance with 10 CFR 50.59 to determine that, following NRC approval of the requested code alternative, no unreviewed safety questions exist and no change to station Technical Specifications is required. Finally, APS has determined that implementation of the proposed code alternative would not require an amendment to the operating license.

Please contact Mr. Scott Bauer at (602) 393-5978 if you have any questions.
This letter does not make any commitments to the NRC.

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PDR ADOCK 05000528
PDR

JML/AKK/RKB/ mah

cc: E. W. Merschoff
M. B. Fields
J. H. Moorman

230009

Sincerely,

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