Mr. James M. Levine Senior Vice President, Nutural Arizona Public Service Company Post Office Box 53999 Phoenix, Arizona 85072-3999

SUBJECT:

ASME CODE ALTERNATIVE REQUEST FOR THE PALO VERDE NUCLEAR

GENERATING STATION (TAC NOS. MA2166, MA2167 AND MA2168)

Dear Mr. Levine:

By letter dated June 25, 1998, as supplemented by letters dated July 10 and July 17, 1998, and March 5, 1999, Arizona Public Service Company (APS or the licensee) requested NRC approval of a proposed alternative to Section III of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code in accordance with 10 CFR 50.55a(a)(3) for Palo Verde Nuclear Generating Station (PVNGS), Units 1, 2 and 3.

The licensee's proposed alternative is part of a design modification to the chemical and volume control system to improve overall system performance. To accomplish this, the licensee plans to replace the existing flow sensors with Coriolis type flow detectors, which are capable of reliably measuring low flow rates. The proposed flow detection instrument is not currently available as an ASME Code, Section III instrument, which is required pursuant to 10 CFR 50.55a(e) for Quality Group C components. The licensee has taken steps to ensure that the level of quality associated with the flow detector design, manufacture, and testing is comparable to an ASME Code, Section III, Class 3 instrument. The licensee's basis for requesting staff approval pursuant to 10 CFR 50.55a(a)(3) is that the proposed alternative provides an acceptable level of quality and safety.

Based on the enclosed safety evaluation, the staff concludes that APS has provided an acceptable alternative to the replacement requirements of Section III of the ASME Code. Therefore, the licensee's proposed alternative provides an acceptable level of quality and safety and is authorized pursuant to 10 CFR 50.55a(a)(3)(i).

If you have any questions, please contact Mel B. Fields at (301) 415-3062.

Sincerely, Original Signed By

William H. Bateman, Project Director

Project Directorate IV-2

Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-528, STN 50-529

and STN 50-530

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Enclosure: Safety Evaluation

PDIV-2 Reading

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cc w/encl: See next page

KBrockman, RIV

DLange, EDO MFields

DOCUMENT NAME: PV-ASME *For previous concurrences see attached ORC

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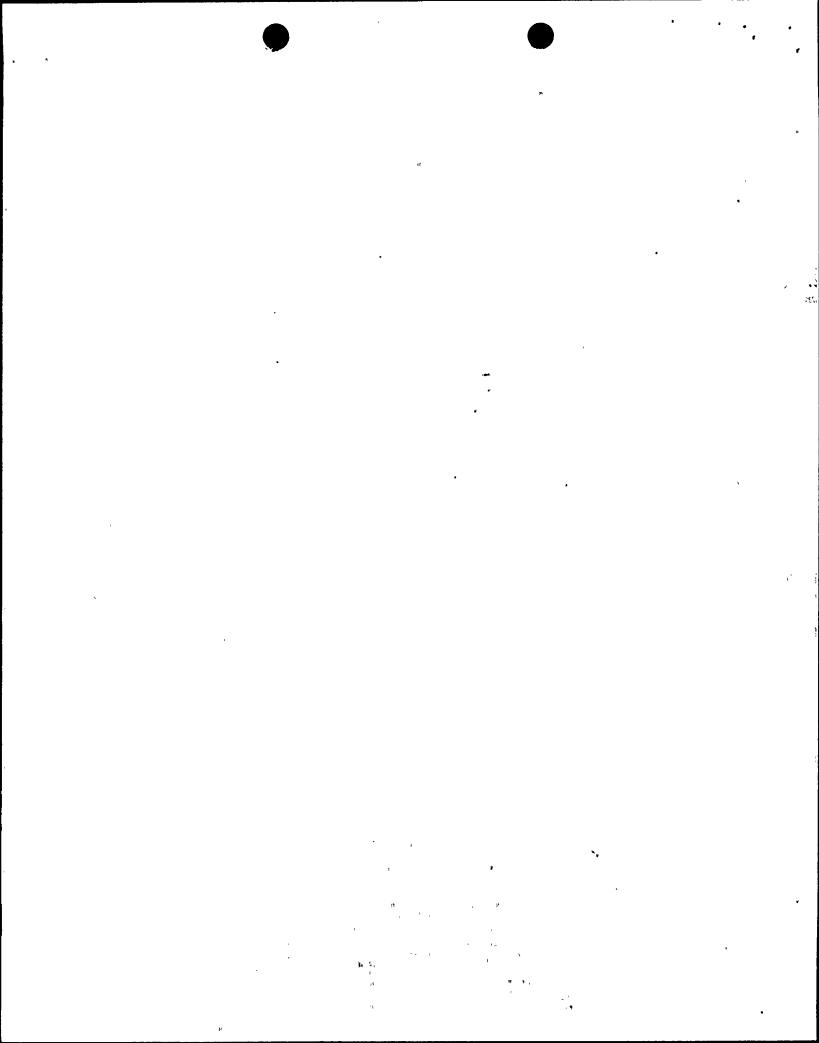
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cc w/encl:
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