

AUDIT WORKSHEET
GALL REPORT AMP

PLANT: _____

LRA AMP: _____

REVIEWER: _____

GALL AMP: **XI.M38, Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components**

DATE: _____

Program Element	Auditable GALL Criteria	Documentation of Audit Finding
Program Description	A. The program consists of inspections of the internal surfaces of steel piping, piping components, ducting, and other components that are not covered by other aging management programs. These internal inspections are performed during the periodic system and component surveillances or during the performance of maintenance activities when the surfaces are made accessible for visual inspection. The program includes visual inspections to assure that existing environmental conditions are not causing material degradation that could result in a loss of component intended functions. If visual inspection of internal surfaces is not possible, then the applicant needs to provide a plant-specific program.	Consistent with GALL AMP: <input type="checkbox"/> Yes <input type="checkbox"/> No Document(s) used to confirm Criteria: Comment:
1. Scope of Program	A. The program visual inspections include internal surfaces of steel piping, piping elements, ducting, and components in an internal environment (such as indoor uncontrolled air, condensation, and steam) that are not included in other aging management programs for loss of material. Inspections are performed when the internal surfaces are accessible during the performance of periodic surveillances, during maintenance activities or during scheduled outages. This program includes indication of borated water leakage on internal surfaces.	Consistent with GALL AMP: <input type="checkbox"/> Yes <input type="checkbox"/> No Document(s) used to confirm Criteria: Comment

Program Element	Auditable GALL Criteria	Documentation of Audit Finding
2. Preventive Actions	A. This program is an inspection activity independent of methods to mitigate or prevent degradation.	Consistent with GALL AMP: <input type="checkbox"/> Yes <input type="checkbox"/> No Document(s) used to confirm Criteria: Comment:
3. Parameters Monitored/ Inspected	A. Visual inspections of internal surfaces of plant components are performed during maintenance or surveillance activities. Parameters monitored or inspected include visible evidence of corrosion to indicate possible loss of materials.	Consistent with GALL AMP: <input type="checkbox"/> Yes <input type="checkbox"/> No Document(s) used to confirm Criteria: Comment:
4. Detection of Aging Effects	A. Periodic inspections provide for detection of aging effects prior to the loss of component function. For painted or coated surfaces, degradation of steel surfaces cannot occur without the degradation of the paint or coating. Confirmation of the integrity of the paint or coating is an effective method for managing the effects of corrosion on the steel surface. The applicant should identify and justify the inspection technique used for detecting the aging effects of concern. Locations should be chosen to include conditions likely to exhibit these aging effects. Inspection intervals are established such that they provide timely detection of degradation.	Consistent with GALL AMP: <input type="checkbox"/> Yes <input type="checkbox"/> No Document(s) used to confirm Criteria: Comment:
5. Monitoring and Trending	A. Visual inspection activities are performed and associated personnel are qualified in accordance with site controlled procedures and processes. Maintenance and surveillance activities provide for monitoring and trending of aging degradation. Inspection intervals are dependent on component material and environment, and take into consideration industry and plant-specific operating experience. Results of the periodic inspections are monitored for indications of various corrosion mechanisms and fouling. The extent and schedule of inspections and testing assure detection of component degradation prior to loss of intended functions.	Consistent with GALL AMP: <input type="checkbox"/> Yes <input type="checkbox"/> No Document(s) used to confirm Criteria: Comment:

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6. Acceptance Criteria	A. Indications of various corrosion mechanisms or fouling that would impact component intended function are reported and will require further evaluation. The acceptance criteria are established in the maintenance and surveillance procedures or other established plant procedures. If the results are not acceptable, the corrective action program is implemented to assess the material condition and determine whether the component intended function is affected.	Consistent with GALL AMP: <input type="checkbox"/> Yes <input type="checkbox"/> No Document(s) used to confirm Criteria: Comment:
7. Corrective Actions	A. Site corrective actions program, quality assurance (QA) procedures, site review and approval process, and administrative controls are implemented in accordance with the requirements of 10 CFR Part 50, Appendix B. As discussed in the appendix to this report, the staff finds the requirements of 10 CFR Part 50, Appendix B, acceptable to address the corrective actions, confirmation process, and administrative controls.	Consistent with GALL AMP: <input type="checkbox"/> Yes <input type="checkbox"/> No Document(s) used to confirm Criteria: Comment:
8. Confirmation Process	A. See item 7, above.	Consistent with GALL AMP: <input type="checkbox"/> Yes <input type="checkbox"/> No Document(s) used to confirm Criteria: Comment:
9. Administrative Controls	A. See item 7, above.	Consistent with GALL AMP: <input type="checkbox"/> Yes <input type="checkbox"/> No Document(s) used to confirm Criteria: Comment:
10. Operating Experience	A. Inspection of internal surfaces during the performance of periodic surveillances and maintenance activities have been in effect at many utilities in support of plant components reliability programs. These activities have proven effective in maintaining the material condition of plant systems, structures, and components. The elements that comprise these inspections (e.g., the scope	Consistent with GALL AMP: <input type="checkbox"/> Yes <input type="checkbox"/> No Document(s) used to confirm Criteria: Comment:

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	<p>of the inspections and inspection techniques) are consistent with industry practice and staff expectations. However, because the inspection frequency is plant-specific and depends on the plant operating experience, the applicant's plant-specific operating experience or applicable generic operating experience is further evaluated for the extended period of operation. The applicant is to evaluate recent operating experience and provide objective evidence to support the conclusion that the effects of aging are adequately managed</p>	

EXCEPTIONS

Item Number	Program Elements	LRA Exception Description	Basis for Accepting Exception	Documents Reviewed (Identifier, Para.# and/or Page #)
1.				
2.				
...				

ENHANCEMENTS

Item Number	Program Elements	LRA Enhancement Description	Basis for Accepting Enhancement	Documents Reviewed (Identifier, Para.# and/or Page #)
1.				
2.				
...				

DOCUMENT REVIEWED DURING AUDIT

Document Number	Identifier (number)	Title	Revision and/or Date
1.			
2.			
3.			
4.			
....			