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16711/FOI
D8(m) Policy Ltr 06-2004
22 December 2004

MEMORANDUM

From: R. W. BRANCH
CCGD8 (m)

To: Distribution

Subj: GUARDRAIL AND STORM RAIL REQUIREMENTS FOR FLOATING OFFSHORE INSTALLATIONS (FOIs)

Ref: (a) 33 CFR 143.110-.120
(b) 46 CFR 108.217-.223

1. **PURPOSE:** This Policy Letter promulgates requirements for guardrails and storm rails installed on FOIs operating within the Eighth District.

2. **DIRECTIVES AFFECTED:** None.

3. **DISCUSSION:**

a. The term "FOI" means a buoyant Outer Continental Shelf (OCS) facility securely and substantially moored so that it cannot be moved without special effort. The term includes tension leg platforms, permanently moored semi-submersibles, and SPARS. It does not include Mobile Offshore Drilling Units (MODUs) and ship-shaped vessels.

b. Reference (a) requires a 42-inch top rail height for guardrails protecting the perimeter and all openings on the decks of OCS facilities except MODUs. Further it directs designers and operators of FOIs to the design criteria found in 46 CFR 108. Reference (b) requires a 39-inch top rail height for guardrails protecting the perimeter and all openings on the decks of MODUs and FOIs. The rail in reference (b) is typical of a "vessel" rail with multiple courses to inhibit a person from washing "through" in a greenwater event while the rail in reference (a) is more typical of a "workplace" rail with a greater top rail height to inhibit a person from falling over.

c. Given the height of the decks above the water and the motion dampening abilities of FOI designs in use to date, a greenwater event occurring on a FOI is practically impossible while personnel are onboard. The industry believes and the Coast Guard has concurred on numerous previous occasions on a case-by-case basis that the increased rail height design found in reference (a) provides a higher level of safety for the most likely event that could occur (i.e. falling over versus washing through).

d. To avoid future multiple case-by-case reviews, FOIs to be operated within the Eighth District are permitted to install either of the guardrail designs described in reference (a) or (b) provided that all rails throughout the entire facility on all deck perimeters and openings are

identical. The only exception would be for rails found on the landing areas associated with stacked modular portable quarters. The guardrails around the landings on stacked modular portable quarters must meet the requirements of reference (b) because they are so frequently interchanged and deployed onboard conventional MODUs.

e. All guardrail systems should be designed and installed in manner that minimizes the horizontal distance between vertical members.

f. Removable guardrails may be installed where operating conditions warrant their use. Such arrangements are to be completed to the satisfaction of the attending USCG Inspector.

g. Considering the absence of adverse movements in FOI hull designs, designers and operators need not comply with the internal storm rail requirements of 46 CFR 108.221 (b) and (c). Operators are still required to comply with the external storm rail requirements of 46 CFR 108.221(a).

h. This policy letter is applicable to both existing and new construction projects.

i. This policy letter does not apply to conventional ship-shaped hulls. Designers and plan reviewers of new FOIs utilizing new or novel hull designs not currently employed in the Gulf of Mexico (GOM) will be required to request a determination from CCGD8 (m) for the applicability of this policy letter to the proposed design.

4. **ACTION:**

a. Eighth District OCMIs shall disseminate the contents of this Policy Letter to all Coast Guard marine inspectors and owners and operators of all FOIs operating in the GOM.

b. The Marine Safety Center should bring the contents of this Policy Letter to the attention of all Classification Societies acting on the Coast Guard's behalf for the construction of FOIs destined for service within the GOM.

5. **FEEDBACK:** Questions on this policy should be referred to the Eighth Coast Guard District, D8(moc-2), at 504-589-6260.

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Dist: All Eighth District MSOs & MSUs

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