



16703
25 September 1997

From: Commander, Eighth Coast Guard District
To: Distribution

Subj: INTERIM POLICY GUIDANCE ON LIFESAVING REGULATIONS IN 46
CFR SUBCHAPTER IA

1. The lifesaving equipment interim rule (Federal Register of May 20, 1996), revising the lifesaving provisions in 46 CFR Subchapter IA, became effective on 1 October 1996. Since implementation, there have been many questions regarding applicability of the revised regulations to new and existing mobile offshore drilling units (MODUs) including foreign vessels with a Letter of Compliance (LOC). The following guidance is provided to assist with the enforcement of these regulations:

a. New MODUs must meet all provisions of the interim rules. MODUs built before October 1, 1996 must meet only 46 CFR 108.515, which allows units to retain the arrangement of lifesaving appliances previously required and approved, as long as the equipment is maintained in good condition to the satisfaction of the Officer-in-Charge, Marine Inspection (OCMI). This means existing MODUs are not required to upgrade the lifesaving appliances, including marking requirements in 46 CFR 108 Subpart G. This does not preclude owners/operators of MODUs from upgrading equipment and marking lifesaving equipment and installations in accordance with the new regulations. It is important to note that subsections b (1) and (2) allow replacement of the lifeboat or davits without meeting the new regulations.

b. If an existing MODU installs lifeboat equipment in accordance with the new regulations, they must fully comply with the new regulations. Lifeboat equipment may not be a mix of equipment required by the old and new regulations.

c. Both new and existing MODUs, including foreign flag MODUs, must meet all requirements described by the interim rules in 46 CFR Part 109.

d. The regulations in 46 CFR 109.213 require additional training and extensive drills for the crews and industrial personnel on MODUs. OCMI's should ensure that required training and drills are being conducted and logged and that these new requirements are incorporated into drills witnessed during Coast Guard inspections. Enclosure (1) is a checklist of the new operational requirements. This checklist may be used to guide MODU inspections and may be provided to MODU personnel to help them comply with the new requirements.

16703
25 September 1997

Subj: POLICY GUIDANCE ON LIFESAVING REGULATIONS IN 46 CFR
SUBCHAPTER IA

e. Retroreflective material required by 46 CFR 108.645 and 108.649 must be installed on all floating appliances, life-jackets, and immersion suits by 1 October 1997. (See NVIC 01-87 for installation instructions.)

f. Chemiluminescent-type lifejacket lights approved under 46 CFR 161.012 may be used on MODUs operating in the Gulf of Mexico.

g. There is no longer a requirement to conduct a 100% weight load test of the lifeboats during the Inspection for Certification. 46 CFR 109.301(i)(5) requires a 110% operational releasing gear test whenever the releasing gear is overhauled or at intervals not to exceed 5 years. This test must be carefully evaluated prior to being conducted in the offshore environment. OCMI's should ensure that the test can be conducted safely or require that an alternative test be arranged.

2. For foreign flag MODU's which are issued letters of Compliance under options "A", "B" or "C" of NVIC 3-88 the following applies:

a. LOC option "A" - must meet the requirements of 46 CFR Subchapter IA using the policy guidance in paragraph 1 above.

b. LOC option "B" - must meet either the requirements in 46 CFR Subchapter IA using the policy guidance in paragraph 1 above or be equipped in accordance with SOLAS (IMO MODU CODE) requirements.

c. LOC option "C" - must be equipped in accordance with SOLAS (IMO MODU CODE) requirements.

3. The policy guidance provided in this distribution letter addresses the regulations contained in the interim rule on lifesaving equipment. D8(moc-3) will work with Commandant to clarify the applicability of the revised lifesaving equipment regulations prior to publication of the final rule.

4. Questions should be addressed to Chief Warrant Officer Gary Busby of my staff at (504) 589-6271.


G. A. TETREAU
By direction

Encl: (1) Checklist of new operational requirements for all MODUs

Dist: All Eighth District Gulf Region MSOs, MSU and MSDs

Copy: Commandant (G-MSE-4)

SUMMARY OF NEW OPERATIONAL REQUIREMENTS FOR ALL MODUS

Abandonment training material must be on board each unit. The training material must consist of a manual of one or more volumes, written in easily understood terms and illustrated wherever possible. The training materials may include audiovisual aids and videos. The training requirements are outlined in 46 CFR 109.213.

Every crew member must participate in at least one abandonment drill and one fire drill every month.
Ref: 46 CFR 109.213 (c)(2).

A drill must take place and be properly logged within 24 hours of each crew change, including industrial personnel, and if more than 25 percent of the persons on board have not participated in an abandonment drill in the previous month. Ref: 46 CFR 109.213 (c)(2).

Each drill must include the lowering of lifeboats and operating the liferaft davits.
Ref: 46 CFR 109.213 (d).

Each lifeboat must be launched with its assigned operating crew aboard and maneuvered in the water at least once every 3 months during an abandonment drill.
Ref: 46 CFR 109.213 (d)(3).

Emergency lighting must be tested at each abandonment drill. Ref: 46 CFR 109.213 (d)(6).

On a unit carrying immersion suits, immersion suits must be worn during at least one drill each month. If warm weather prohibits donning immersion suits, the crew members must be instructed in the use of immersion suits. Ref: 46 CFR 109.213 (d)(7).

Line-throwing appliance training must be conducted at least once every three months. Ref: 46 CFR 109.213 (e).

Onboard training in use of davit-launched liferafts must take place at intervals of not more than 4 months on each unit with davit-launched liferafts.
Ref: 46 CFR 109.213 (g)(5).

New personnel must be trained within 2 weeks of reporting on board in the use of the unit's lifesaving appliances, including survival craft equipment, and in use of the unit's fire-extinguishing appliances.
Ref: 46 CFR 109.213 (g).

Enclosure (1)

The crew and industrial personnel must be instructed in the use of the unit's fire-extinguishing appliances, lifesaving appliances and in survival at sea at the same interval as the drills. Ref: 46 CFR 109.213 (g).

The rig must maintain records of the following:

- All abandonment and firefighting drills
- All onboard training sessions (date/time/personnel)
- Identify lifesaving or firefighting equipment used in the drills
- Identify malfunctions of lifesaving and/or firefighting equipment
- Identify all personnel participating in drills or training sessions

Ref: 46 CFR 109.213 (h).

If a required drill or training session is not conducted, the master or person-in-charge must enter a statement in the logbook stating adequate reasons for not conducting the required operations.

Ref: 46 CFR 109.213 (h)(2).

All firefighting equipment must be tested and inspected at least once each twelve months.

Ref: 46 CFR 109.223.

The manufacturer's instructions and checklists for onboard maintenance of lifesaving appliances must be onboard. In lieu of these requirements, the OCMI may accept a planned maintenance program.

Ref: 46 CFR 109.301 (b).

Weekly, Monthly and Annual Inspections of safety equipment conducted and logged in accordance with 46 CFR 109.301.

Batteries without an expiration date for survival equipment must be replaced during each annual inspection. Ref: 46 CFR 109.301 (f).

Each fall used in the a launching appliance must be turned end-for-end at intervals of not more than 30 months and must be renewed when necessary due to deterioration or at intervals of not more than 5 years, whichever is earlier.

As an alternative to end-for-ending, each fall may be inspected annually and renewed whenever necessary due to deterioration or at intervals of not more than 4 years, whichever is earlier.

Ref: 46 CFR 109.301 (j).

_____ Lifeboat and rescue boat release gear must be serviced at intervals recommended by the manufacturer or as set out in the planned maintenance program. Release gear must be subjected to a thorough examination by properly trained personnel familiar with the system at each inspection for certification.
Ref: 46 CFR 109.301 (i).

_____ Release gear must be operationally tested under a load of 1.1 times the total mass of the lifeboat when loaded with its full complement of persons and equipment, whenever overhauled, or at least once every 5 years.
Ref: 46 CFR 109.301 (i)(5).

_____ Two certificated lifeboatmen must be designated for each lifeboat with a capacity greater than 40 persons.
Ref: 46 CFR 109.323 (c)(2).

_____ Expectation for drills: Each survival craft must be capable of being boarded by the full complement within 3 minutes from the time the instruction is given to board. Complete preparations for embarkation and launching must be made in less than 5 minutes. All lifeboats must be capable of being launched with their full complement of persons and equipment within 10 minutes.
Ref: 46 CFR 108.530 (a)(5), 46 CFR 108.540 (d), and 46 CFR 108.550 (b).