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16711/ALTERNATE
HULL EXAMS
D8(m) Policy Ltr 07-2000
28 February 2000

From: Commander, Eighth Coast Guard District
To: Distribution

Subj: APPROVAL FOR THE USE OF DIVERS/IMETRIX REMOTELY OPERATED VEHICLE (ROV) PROCESS FOR UNDERWATER EXAMINATIONS OF PASSENGER VESSELS

Ref: (a) COMDT (G-MOC) Policy Letter 3-98
(b) Notice of Proposed Rulemaking (NPRM), Federal Register, Vol. 64, No. 219, dated November 15, 1999

BACKGROUND:

1. Recent technological advancements in the diver/ROV underwater examination process have proven effective for examinations in lieu of drydocking. Current ROV technology permits the accurate measurement, data collection, and detailed mapping of plate thickness with ultrasonic testing (UT), coating thickness, and cathodic protection effectiveness. Use of a combined diver and approved ROV hull examination provides an effective way to evaluate a vessel's hull condition and determine the extent of needed repairs and/or additional maintenance. Limitations on current ROV technology are primarily related to its use on highly curved surfaces and fracture detection.

2. Specialty Diving Inc. has completed approximately 16 underwater examinations in accordance with reference (a). In addition, under the close scrutiny of MSD Baton Rouge representatives, the two most recent underwater exams were successfully completed on the M/V CASINO ROUGE and the M/V ARGOSY III, using the diver/ROV process. Using a state-of-the-art ROV manufactured and operated by Imetrix, UT measurements were taken approximately every six inches along most of the vessel's underwater hull, as well as cathodic protection and coating thickness measurements. Locally developed reproducibility and accuracy testing was conducted and divers were required to take confirmatory UT measurements that produced satisfactory results. Based upon these qualifications, the diver/ROV process was approved for use on both of these inspections.

POLICY:

3. This policy supplements reference (a). It considers the diver/ROV process as an approved alternate hull examination method that may be used in support of examinations conducted in accordance with reference (a). This policy letter is applicable only to vessels regulated under 46 Code of Federal Regulations, subchapters H, K, or T.

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4. A diver based underwater hull examination supplemented by the Imetrix, Lamp Ray ROV shall be accepted without further proof of the technology. Eighth District OCMIs should not require additional independent reproducibility/accuracy studies given that prior satisfactory studies have been conducted and evaluated.

5. Until Commandant changes current policy in reference (a), or reference (b) is finalized allowing 60 month extensions for diver/ROV based alternate hull exams, vessels are limited to a maximum drydock extensions of 30 months. Commandant (G-MOC) *may* consider granting a 60 month extension, retroactive to those vessels that used an approved diver/ROV hull examination process

6. This policy is based upon the ROV performance during the aforementioned inspections, the quality control and reproducibility studies conducted by Imetrix, and the conditional approval of this technology by the American Bureau of Shipping and Lloyds Register of Shipping. This policy is specific only to diver based inspection systems supplemented by the Imetrix ROV. Other ROV manufacturers will be required to obtain similar approvals before they are accepted for this program.

C. T. DESMOND
By direction

Dist: All Eighth District MSOs, MSU and MSDs

Copy: Commandant (G-MOC)