

# MSC Guidelines for Review of Room-In-Room Construction

Procedure Number: SOLAS-25

Revision Date: 06/16/2010

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## References

- SOLAS 2004 Cite: II-2/13.1.1
- SOLAS 2001 Cite: II-2/28.1

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## Contact Information

If you have any questions or comments concerning this document, please contact the Marine Safety Center by e-mail or phone. Please refer to Procedure Number: **SOLAS-25**.

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## Reference Text

“Safe escape routes shall be provided ...”

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## Guidance

"Room-in-room" construction describes an arrangement where occupants of the interior space are not provided with direct access to an acceptable means of escape. Acceptable means of escape are stairways, corridors, and open deck escape routes. It is recognized that certain room-in-room arrangements (such as bedrooms in cabin suites, small offices inside galleys, and saunas) are necessary for the practical utility of the vessel. In these cases, an equivalent level of safety should be provided for escape purposes. Specifically, in lieu of an acceptable means of escape, we will accept an arrangement where passengers and crew in these areas are given immediate and clear notification of a fire in the surrounding space. Such notification permits personnel in the isolated space to escape through the surrounding space before smoke and fire reach a level that will prevent safe passage. In general, such room-in-room construction should be strictly reserved for intractable situations in which direct access to an acceptable means of escape cannot be provided.

The following are generally not considered room-in-room construction and do not require direct access to an acceptable means of escape: 1) Spaces, within atriums, that are protected by the atrium smoke extraction system, and 2) Isolated pantries within large accommodation spaces that are used by the crew only intermittently. In general, preparation rooms, workshops, offices, and other spaces where crew are normally employed should always be provided with direct access to acceptable means of escape.

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## Background

Audible alarms were introduced some years back to resolve a concern that spaces were being arranged inside larger public spaces and escape from these internal areas could be impeded if a fire occurs inside the larger space. However, over time, this "fix" proliferated and was used to justify such arrangements. As the original intent was to address a specific concern, not create a new type of design arrangement, we find it necessary to develop some guidance regarding how we expect these room-in-room arrangements to be applied.

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## Disclaimer

This guidance is not a substitute for applicable legal requirements, nor is it itself a rule. It is not intended to nor does it impose legally-binding requirements on any party. It represents the Coast Guard's current thinking on this topic and may assist industry, mariners, the general public, and the Coast Guard, as well as other federal and state regulators, in applying statutory and regulatory requirements. You can use an alternative approach for complying with these requirements if the approach satisfies the requirements of the applicable statutes and regulations. If you want to discuss an alternative, you may contact The Marine Safety Center, who is responsible for implementing this guidance.