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SUBJ: Update Commercial Vessel Compliance Foreign and
Offshore

Vessels Branch (CVC-2)

1. The Office of Commercial Vessel Compliance (Foreign and Offshore Vessels Division, (CG-CVC-2)) has been very active in the wake of the Deepwater Horizon incident implementing interim and long term performance support and training solutions for offshore inspectors. To ensure transparency of operations at the HQ level, the following is an update of our current status and future plans in regards to offshore outreach programs, policy updates and regulatory projects.

A. OCS Voluntary Guidance Outreach Program. The Coast Guard is in the process of publishing voluntary guidance notices in the Federal Register based on current industry best practices and recommendations for lifesaving and firefighting standards, hazardous areas, dynamic positioning (DP) and the 2009 MODU Code. With a rulemaking project underway to address many of the safety concerns identified above, a voluntary outreach program has been initiated with the intent to encourage industry participation and educate our inspectors on these voluntary standards. This program will also serve as a bridge until the proposed rulemaking projects are completed. Currently only the 2009 MODU Code and the DP voluntary standards have been published. Links to these Federal Register Notices, accompanying message traffic, and any attachments can be found at: <https://homeport.uscg.mil/ocs>. A policy letter from HQ for clarity and guidance, on all the above voluntary standards, will be issued once the last FR Notice

has been published.

B. Regulatory Projects. Currently CVC-2 is involved in four regulatory projects Subchapter N (33 CFR 140-147), Commercial Diving, Subchapter L and Accommodation Service Vessels (ASV). Subchapter N continues to make progress. Parts of Subchapter N have been removed from the original rulemaking project and are now on a fast track schedule due to their high priority. The Commercial Diving regulations are being promulgated and in the final stages of development. Subchapter L (OSVs greater than 6000 GT) has been submitted to DHS for review. The Accommodation Service Vessel (ASV) Project team is developing voluntary guidelines for an anticipated advanced notice of proposed rulemaking release in CY2013. In addition, a task statement has been developed for submittal to National Offshore Safety Advisory Committee (NOSAC), which seeks industry input on ASVs.

C. OCS Inspector Front End Analysis. CVC-2 has undertaken a three Phase approach when it comes to completing certain objectives identified in the Outer Continental Shelf Inspection New Performance Planning Front End Analysis of 15JUN2011

i. Phase I includes updates to the OSV (OI), MODU (MU) PQS and Job Aids, integration of D8 and HQ Policy into the Marine Safety Manual Vol. II, development of an interim training course for MODU Inspectors, and identification of resource requirements, gaps and solutions. So far the OSV PQS is 75 percent complete, a first draft of MSM updates has been completed, the first MODU course was held on September 10-12 with plans in the works for another rendition in FY13, and HQ is working to begin a multi-year re-leveling of Sectors through the Sector Staffing Model, with the busiest units receiving additional billets based on workload. Phase I objectives are on target with the exception of the MODU PQS, which will be started once the OSV PQS is completed.

ii. Phase II objectives include development of MODU and FOI PQS and job aids, focused outreach to units by the NCOE, and development of a fall protection policy. CG-CVC and CG-ENG initiated an Outreach Program to disseminate voluntary standards to field units and industry (see Section A. above). CG-ENG and CG-CVC provided training to attendees of the 2012 MODU course on voluntary DP standards. Additional training is scheduled on the remaining voluntary standards during the OCS Marine Inspectors Meeting scheduled for early December in New Orleans. CVC-2 will be collaborating with CG-1132 to

develop a fall protection policy which will be program specific. The program policy will be an expansion of an organization wide policy developed by CG-1132. Most Phase II items continue to be a work in progress with target dates falling within CY2013.

iii. Phase III objectives include the establishment of a formal MODU inspector course, development of enhanced job aids and PQS, and completion of the new OCS chapter in the MSM Volume II. All of these items have target completion dates in the later part of 2013 and 2014.

2. Field units are encouraged to reach out to LCDR Nikki Samuel (CG-CVC-2) (OCS) at 202-372-2267 for any questions concerning this message.

3. CAPT Kyle McAvoy, Chief, Office of Commercial Vessel Compliance Division, sends.

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