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From: Commandant
To: Distribution

Subj: PRESSURE VESSEL INTERNAL EXAMINATION AND RELIEF VALVE TESTING FOR FOREIGN FLAG MODUS OPERATING ON THE OUTER CONTINENTAL SHELF (OCS)

Ref: (a) NVIC 3-88, Change 1
(b) 33 CFR 143.207
(c) 46 CFR 61.10

1. This policy letter is promulgated to clarify the U.S. Coast Guard's position with regard to the intervals for the internal examination of pressure vessels and testing of relief valves for foreign-flagged mobile offshore drilling units (MODU) operating on the Outer Continental Shelf (OCS).

2. The intent of reference (a) and (b) is to ensure that foreign-flagged MODUs operating on the OCS meet a level of safety equivalent to the U.S. flagged MODUs. On February 9, 2000, the U.S. Coast Guard amended its inspection frequency regulations by implementing the five-year Certificate of Inspection (COI) to harmonize with international regulations. With the introduction of new regulations in reference (c), the interval for internal examination of pressure vessels has changed to once every five years and the testing of relief valves has changed to twice in five years with no interval more than three years. Since reference (a) predates the current regulations, significant differences exist between the inspection intervals for U.S. flagged MODUs and foreign-flagged MODUs with regard to pressure vessels and relieving devices.

3. Effective immediately, foreign-flagged MODUs operating on the OCS shall have pressure vessels internally examined once every five years in accordance with reference (c). In addition, all relief valves shall be tested twice in five years with no intervals more than three years in accordance with reference (c). Per paragraph (b) of reference (b), the only exception to this policy is when the accepted standards of a unit's flag state or documenting nation are more stringent. All other requirements for pressure vessels in reference (a) apply.

4. It is the responsibility of the unit's owner to present sufficient documentation demonstrating such inspections and tests have been conducted and witnessed by authorized representatives within the specified intervals. If sufficient evidence is not available, they will need to be inspected or tested to the satisfaction of the cognizant OCMI prior to issuance of the Letter of Compliance (LOC) or Certificate of Compliance (COC). Marine Inspectors shall ensure that internal exam and relief valve test dates are documented on the LOC or COC.

J. D. SARUBBI
By direction

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