



U.S. Coast Guard Marine Safety Center News

HOT Issues Regarding Control Verification Plan Review

Status of SOLAS Retroactive Fire Safety Amendments (RFSA) Plan Review

Plan review for foreign passenger ships requiring modifications for compliance with the Retroactive Fire Safety Amendments is essentially completed. Less than 10% of vessels have unresolved interpretive plan review comments still outstanding. These issues are being addressed on a case-by-case basis by the USCG Marine Safety Center. Approximately 25 existing foreign ship operators have expressed intent to visit U.S. ports, but have

not yet contacted the Marine Safety Center.

Retroactive Fire Safety Amendments Effective in October 2000

Several of the 1992 Retroactive Fire Safety Amendments require compliance no later than 1 October 2000. No plan review submissions will be required in advance of examinations. However, in an effort to facilitate the verification process, the Coast Guard's position and guidance on these amendments is summarized below.

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Regulation II-2/41-2.6.1: Enclosure of Stairways in Accommodation and Service Spaces

The Coast Guard forecasts very few vessels to be remaining in the fleet with stairways that are not steel frame construction or that are not enclosed by "A" class divisions. Some SOLAS

48 and SOLAS 60 Method II vessels are likely to require upgrading. Method II “auxiliary stairways” (SOLAS 60 Regulation 42(b)(iv)) are to be enclosed as well as any stairways that were previously only enclosed to the “level which is directly accessible to the open deck.” Method II vessels will be examined for full compliance with this amendment. The ancillary issues of direct access, fire insulation, ventilation separation, and continuity of escape must be considered when enclosing stairways. Also, no new dead-end corridors should be created. While not required, plans may be submitted to the MSC for review if the vessel operators feel it would be beneficial to the examination process.

Regulation II-2/41-2.6.2: Category A Machinery Space Fixed Fire Extinguishing Systems

As with the retroactive automatic sprinkler requirement for compliance of existing installations with Regulation II-2/12 (1992 amended version), the retroactive requirement for fixed fire-extinguishing systems specifies compliance with the 1992 amended version of Regulation II-2/7. Regulation II-2/7 in turn refers to other fixed system regulations (Regulations II-2/5, 9, 10). SOLAS 48 and SOLAS 60 vessels must ensure that spaces are properly defined as machinery spaces of category A and protected accordingly. Proof of fixed system compliance will be verified during Coast Guard examinations.

Regulation II-2/41-2.6.3: Ventilation Ducts Penetrating Main Vertical Zones

Compliance with this regulation will be verified by spot checks by Coast Guard marine inspectors during regularly scheduled control

verification examinations. The new, flag-approved ventilation system drawings with noted revisions should be made available to the Coast Guard during these exams.

Regulation II-2/41-2.6.4: Vehicle Deck Upgrades

Retroactive compliance with the special category and ro-ro cargo space requirements, regulations 37 and 38, will greatly impact SOLAS 48 and 60 vessels. However all ships built prior to 1994 will require certain upgrades, such as increasing bulkhead and deck insulation ratings to A-60.

Regulation II-2/41-2.6.5: Fire Door Remote Releases

All hinged fire doors should have been upgraded in 1997. Now sliding fire doors and overhead fire shutters must be provided with the remote and local releases. Obvious cautions must be taken to ensure that remotely released sliding doors are no hazard to people. The SOLAS unified interpretation to this regulation states that doors should, in general, satisfy the door closing requirements of Regulation II-2/30.4. These requirements include standards for door performance and alarms, as well as remote releases.

Issues for New Vessel Designs

The IMO Maritime Safety Committee approved the unified interpretations and promulgated them under MSC Circular 847. The Coast Guard applies these interpretations during plan review and examinations. Some recent interpretive issues, which are not addressed by the MSC Circular, but commonly encountered in plan review are discussed below.

1. Control station automatic sprinklers

Automatic sprinklers are required in control stations on new passenger ships carrying more than 36 passengers. The use of manual valves is not permissible. Other fixed systems, installed in lieu of automatic sprinklers, must be a type that is approved by the flag administration and should be presented to the Coast Guard in plan review. Preaction sprinkler systems, as discussed in IMO Resolution A.800, are a noteworthy alternative.

2. "Open deck" spaces

The Coast Guard will continue to look closely at the classification of "open deck" spaces. The amount of opening required for classification as an open deck is recognized as an interpretive issue. However, where the openings are not permanent the Coast Guard expects the spaces to be treated as enclosed spaces. Any enclosed spaces are to be classified under Regulation II-2/26. The Coast Guard also expects enclosed spaces to be fitted with fire detection and suppression as required under Regulations II-2/36 or II-2/7, 11,14, 37, 38 or 40.

3. Deck openings

Openings such as balconies and atriums have been allowed under SOLAS for many years. However, the compartmentalization of public spaces and the reduction in the size of openings has raised concern. The Coast Guard recognizes that SOLAS atrium and open stairway regulations permit design features where deck to deck fire integrity is unnecessary. However, the SOLAS allowance of such arrangements must be balanced by the principle of fire containment, demonstrated in the requirement for maintaining deck integrity in two-deck stairways. For single deck openings,

the interpretation between a two-deck stairway and an open stairway/balcony arrangement will be closely reviewed. For atriums, deviations from the standard, large, vertically symmetrical openings will be subject to scrutiny. Any issues or concerns should be raised very early in plan review.

Marine Safety Center Online

The MSC website, www.uscg.mil/hq/msc, is a repository for a wealth of information pertaining to commercial vessel safety. Numerous links are provided to key information such as Navigation and Vessel Inspection Circulars (NVICs 1-93 and 4-95 being the most well known to the cruise industry).

Electronic Plan Submission

The Marine Safety Center has established a policy for accepting electronic plan submissions. We encourage the use of the process for all vessel submittals including foreign passenger vessel verifications. For more details or a copy of the procedure check out our website, call or write to us.

The Marine Safety Center is available to answer questions at any time during the design and construction process. Concept review of novel arrangements and designs is encouraged. Please contact the Chief of the Major Vessel Branch (LCDR Charlie Rawson) at (202)366-6481 or fax your inquiry to (202)366-3877. We look forward to working with you.