



COMMANDANT INSTRUCTION 3150.3

Subj: ADMINISTRATION OF DIVING OPERATIONAL READINESS ASSESSMENTS

- Ref: (a) Coast Guard Diving Policies and Procedures Manual, Volume I, COMDTINST M3150.1 (series)  
 (b) U.S. Navy Diving Manual, SS521-AG-PRO-010  
 (c) Memorandum of Agreement between the United States Coast Guard and the United States Navy, 03 Feb 2011  
 (d) Diving Operational Readiness Assessment (DORA) Program, COMUSFLTFORCOMINST 3501.1  
 (e) NAVSAFECEN Diving Survey Checklists

1. PURPOSE. To provide guidance for administration of Diving Operational Readiness Assessments (DORA) and Diving Safety Surveys (DSS) upon Coast Guard diving commands.
2. ACTION. All Coast Guard unit commanders, commanding officers, officers-in-charge, deputy/assistant commandants, and chiefs of headquarters staff elements shall comply with the provisions of this Instruction. Internet release is authorized.
3. DIRECTIVES AFFECTED. Reference (a) has been changed to reflect the transition for Diving Program Safety Surveys (DPSS) to DORAs.
4. BACKGROUND. Reference (b) establishes the terms by which Coast Guard diving commands are inspected by a Naval Safety Center DORA team. Non-operational commands (Aviation Technical Training Center) shall be assessed by a DSS vice a DORA. The DORA provides a critical assessment of the command's operational proficiency and compliance with approved procedures per References (a), (c) and (d) while the DSS assesses the command's compliance with administrative and equipment protocols only.

DISTRIBUTION – SDL No. 162

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NON-STANDARD DISTRIBUTION: \*D:l – Naval Diving and Salvage Training Center only

5. POLICY.

a. Purpose. The DORA will assess the following:

- (1) Administration. All diving-related training and administration programs will be reviewed for completeness and accuracy.
- (2) Material Condition. The DORA team will assess the material condition of all diving equipment.
- (3) Training. The command diver training program, including the long-range and short-range training plan will be reviewed along with the personnel qualification standards (PQS) program.
- (4) Knowledge.
  - (a) Written Examinations. A written examination will be administered to all personnel assigned to supervise or perform diving operations or diving maintenance.
  - (b) Interviews. Oral interviews may be given at the discretion of the senior member of the DORA team.
- (5) Operational Performance. Operational dives designed to demonstrate proficiency in each mode of diving applicable to the diving unit will be observed and evaluated (i.e. open circuit scuba, AGA in scuba mode). Operational performance includes initial dive briefs through post-dive maintenance. Simulated casualty drills will be imposed. The diving command shall retain ultimate responsibility for the conduct of the diving operations and the safety of personnel. All operations shall be initiated, conducted, and terminated by command supervisory personnel.

b. Organization and Responsibilities.

(1) Commandant (CG-7212).

- (a) Responsible for the overall administration of the Coast Guard's DORA program.
- (b) Catalogue DORA results through electronic filing of DORA reports.
- (c) Provide funding for travel and administration of DORAs in accordance with Reference (a).

(2) DORA Team.

- (a) Conduct in- and out-briefs for DORAs. Thoroughly review DORA discrepancies in accordance with Reference (d) and suggest corrective actions in the out-brief.
- (b) Terminate and reschedule DORAs if:
  - 1) Material/safety conditions exist which would endanger the lives of personnel conducting operations required by the DORA.
  - 2) The operational status of equipment/systems or current manning is degraded to the point that conducting the DORA would prove a limited or meaningless evaluation of the command's ability to conduct diving operations.

(3) Coast Guard Representative to the Naval Safety Center (CGRNSC).

- (a) Participate as a member of the Naval Safety Center DORA Team.
- (b) Coordinate with Operational Commanders for assessment scheduling and support requirements.
- (c) Schedule DORA re-inspections within 60 days of an INCOMPLETE or UNSATISFACTORY DORA.
- (d) In the event the DORA is terminated, the DORA result is UNSATISFACTORY, or the DORA result is INCOMPLETE, immediately notify the Operational Commander and the Coast Guard Dive Program Manager, providing a short summary of DORA results.
- (e) Maintain a database of Coast Guard DORA reports and frequent discrepancies.

(4) Operational Commander.

- (a) Ensure scheduling of DORAs and mitigation of operational conflicts.
- (b) Monitor inspection results and direct corrective action when required.

(5) Diving Command.

- (a) Become thoroughly familiar with this Instruction and its References.
- (b) Conduct diving operations demonstrating proficiency in all required modes of diving.

- (c) Provide program administration documentation and equipment/systems for inspection as required by the DORA team.
  - (d) Provide appropriate representation during DORA evolutions.
  - (e) Provide administrative support and adequate workspace for the DORA team.
  - (f) Make all reasonable efforts, when working to schedule and participate in the DORA, to ensure all members of the dive team are available at the unit during the DORA. No more than 10% of the unit's qualified divers may be absent during a DORA. If more than 10% of the unit's qualified divers will be absent at the time the DORA is scheduled, it will be rescheduled at the discretion of the DORA team in concert with the Operational Commander.
- c. Scheduling. In accordance with the requirements described in References (a), (d) and (e), all Coast Guard Commands with diving capabilities will normally be inspected by a DORA team every 12 months, but the inspection interval shall not exceed 18 months without prior written approval from the operational commander. In the event a diving command exceeds 18 months, the operational commander may elect to place additional restrictions on the operating parameters for diving operations.
- d. Grading.
- (1) To ensure uniformity in assessment criteria and application with all DORA procedures, the checklists found in Reference (e) and disseminated on the Naval Safety Center website <http://www.safetycenter.navy.mil/>, should be used for DORA preparation and administration.
  - (2) Grading standards are as follows:
    - (a) **SATISFACTORY** – All areas evaluated meet the minimum requirements to conduct safe diving operations. Unrestricted diving operations may be conducted.
    - (b) **UNSATISFACTORY** – The area evaluated does not meet the minimum requirements for safe diving operations or the command is unable to demonstrate or maintain the minimum equipment, knowledge or capability required complete a safe assessment. An **UNSATISFACTORY** report will recommend suspension of the command's authority to conduct diving operations and will specify the corrective actions required to attain a **SATISFACTORY**. Immediate notification to the respective Chain of Command and Commandant (CG-7212) shall be made.
    - (c) **INCOMPLETE** – Emergent material casualties or safety conditions exist which endanger the lives of personnel conducting operations, or the

operational status of systems or equipment are degraded to the point that conducting the DORA would provide a limited or meaningless assessment. Immediate notification will be provided to the respective Chain of Command and Commandant (CG-7212). The report will recommend suspension of the command's authority to conduct diving operations and will specify the corrective actions required for rescheduling the assessment.

- e. Re-inspection. If an assessment is judged to be UNSATISFACTORY or INCOMPLETE, a re-inspection shall be scheduled within 60 days of the initial assessment. Only those areas evaluated as UNSATISFACTORY or NOT PREVIOUSLY EXAMINED need to be looked at during re-inspection. Re-inspection will be scheduled by the dive command. If the re-inspection commences greater than 60 days after the first assessment or the DORA team considers it necessary, a complete assessment of all areas should be conducted.
- f. Notification and Reports.
  - (1) DORA Letter of Notification. This letter is provided by the CGRNSC. Approximately 60 days prior to the DORA, CGRNSC will forward a letter of notification to the command to be assessed. Commandant (CG-7212) and the Operational Commander for the assessed unit shall be copied. The letter will contain specific criteria for the assessment, identify the DORA team members and include a schedule of events. Enclosure (1) provides a sample DORA letter; it should be modified, as necessary, for each assessment.
  - (2) DORA Quick-Look Report. This report is provided by the CGRNSC/DORA Team. If an overall grade of UNSATISFACTORY is assigned, the DORA Team will immediately notify the unit's chain of command and Commandant (CG-7212) and provide a summary of the DORA results. The Operational Commander will maintain ultimate authority for determination of a diving command's authorization to continue diving operations.
  - (3) DORA Report of Inspection. This report is provided by the CGRNSC/DORA Team. Within 30 days of the DORA, the CGRNSC will forward a formal report of assessment results to the dive unit's chain of command. The report will contain an evaluation of the DORA, including such comments as may be required to substantiate the evaluation. Major discrepancies noted, along with recommendations for improvements or correction of the discrepancies and a summary of operational exercises will be included as enclosures. Enclosure (2) provides a sample DORA report of inspection.
  - (4) Intent to Continue Diving Operations. This message is transmitted by the Operational Commander. If an Operational Commander desires to continue diving operations following an UNSATISFACTORY or INCOMPLETE DORA result, the Operational Commander must transmit an "Intent to Continue Diving Operations" message to Commandant (CG-7212). The message should summarize the DORA discrepancies,

justify the need to continue diving operations in spite of the DORA discrepancies, and list corrective actions to be taken in order to bring the diving command into compliance with established procedures. This message should only be submitted in the event of an UNSATISFACTORY or INCOMPLETE DORA result and is for visibility only; no approval or response is required by Commandant (CG-7212).

- (5) Corrective Action for Resolution of Discrepancies. This report is provided by the Diving Command. Within 14 days of receipt of the DORA Report of Inspection, the assessed command shall forward a Corrective Action for Resolution of Discrepancies Report, through the operational commander, to Commandant (CG-7212). This report will provide actions already taken and intended actions for resolution of discrepancies, as well as recommended programmatic changes to support safe and effective diving operations. Enclosure (3) provides a Sample Corrective Action Memorandum for Resolution of Discrepancies.
- g. Diving Safety Survey (DSS). Non-operational diving commands such as Coast Guard Liaison Office, Naval Diving and Salvage Training Center (CGLO NDSTC) and USCG Aviation Technical Training Center (ATTC) should be administered the DSS instead of the DORA. The DSS will be scheduled and reported in the same manner as the DORA, addressed above. The DSS will cover Diving Administration, Material Condition, Training and Knowledge in the same manner as the DORA, but will not address Operational Performance due to the command's duties. For DSS administration, the next entity in the chain of command above the non-operational diving unit should be used in lieu of the term "Operational Commander". The DSS will utilize the DORA check-sheets for all applicable scoring sections.
6. REQUEST FOR CHANGES. Recommendations for changes should be forwarded to Commandant (CG-7212).
7. DISCLAIMER. This Instruction is not a substitute for applicable legal requirements. In the event of conflicting information between this Instruction and References (a), (b) or (c), those References should take precedence and the conflicts brought to the attention of Commandant (CG-7212).
8. RECORDS MANAGEMENT CONSIDERATIONS. This Instruction has been thoroughly reviewed during the directives clearance process, and it has been determined there are records scheduling requirements, in accordance with Federal Records Act, 44 U.S.C. 3101 et seq., NARA requirements, and Information and Life Cycle Management Manual, COMDTINST M5212.12 (series). This policy does not have any significant or substantial change to existing records management requirements.
9. ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATIONS.
  - a. The development of this directive and the general policies contained within it have been thoroughly reviewed by the originating office and are categorically excluded under current USCG categorical exclusion (CE) #1 from further environmental analysis, in accordance with Section 2.B.2. and Figure 2-1 of the National Environmental Policy Act

Implementing Procedures and Policy for Considering Environmental Impacts, COMDTINST M16475.1 (series).

- b. This directive will not have any of the following: significant cumulative impacts on the human environment; substantial controversy or substantial change to existing environmental conditions; or inconsistencies with any Federal, State, or local laws or administrative determinations relating to the environment. All future specific actions resulting from the general policies in this Manual must be individually evaluated for compliance with the National Environmental Policy Act (NEPA), Council on Environmental Policy NEPA regulations at 40 CFR Parts 1500-1508, DHS and Coast Guard NEPA policy, and compliance with all other environmental mandates.”

10. FORMS/REPORTS. The forms referenced in this Instruction are available in USCG Electronic Forms on the Standard Workstation or on the Internet:  
<http://www.uscg.mil/forms/>; CG Portal at <https://cgportal2.uscg.mil/library/SitePages/Home.aspx> ; and Internet at <http://cgweb.comdt.uscg.mil/CGForms>.

M. E. BUTT /s/  
Rear Admiral, U. S. Coast Guard  
Assistant Commandant for Capability

- Encl: (1) Sample DORA Report of Inspection  
(2) Sample Memorandum of Notification  
(3) Sample Corrective Action Memorandum for Resolution of Discrepancies

**SAMPLE DORA REPORT OF INSPECTION**

From: Commander, Naval Safety Center  
To: Inspected Unit

Subj: SAMPLE DORA REPORT OF INSPECTION

Ref: (a) MOA BETWEEN THE USCG AND USN, 03 FEB 11  
(b) Coast Guard Diving Policies and Procedures Manual,  
Volume I, COMDTINST M3150.1(series)

Encl: (1) DORA Discrepancy/Recommendation/Comment List

1. Per References (a) and (b), a DORA of enter unit name was conducted enter date. The Assessment Team concluded that enter unit is capable of conducting safe diving operations utilizing all assigned diving equipment. The overall grade of this DORA was Satisfactory or Unsatisfactory. Enclosure (1) provides a list of noted discrepancies, recommendations and comments.

2. Four functional areas were evaluated during this assessment. Grades are based on the teams experience and knowledge in working with other diving commands throughout the Coast Guard and Navy. Grades of "above average," "average," "below average" and "unsat" are possible for each area except the operations. An overall grade of "satisfactory" or "unsatisfactory" is derived from the summation of the key are grades.

- a. Administration: GRADE
- b. Material condition: GRADE
- c. Operations: GRADE
- d. Level of Knowledge: GRADE

3. The Assessment Team observed an operational dive and administered written examinations of all divers present and neurological examinations of half the diving supervisors. The results are shown below.

- a. Results of Operational Dives
  - (1) Open Circuit Scuba: GRADE
  - (2) MK 20 Scuba: GRADE
  - (3) Cold Water/Ice diving configuration: GRADE
- b. Results of neurological examinations
  - (1) 2<sup>nd</sup> Class Divers/DMT: GRADE, average test score %

Enclosure (1) to COMDTINST M3150.3

(2) Diving Officer: GRADE, average test score %

Subj: DIVING OPERATIONAL READINESS ASSESSMENT (DORA) REPORT  
ICO unit being inspected

c. Results of Written Examination

(1) SCUBA/2<sup>nd</sup> Class Divers: GRADE, average test score %

(2) Dive Supervisors: GRADE, average test score %

(3) Diving Officers/Dive Team Leaders: GRADE, average  
test score %

4. RDLW will Provide Deployable Operations Group with a POA&M for resolution of all discrepancies listed in enclosure (1) within 30 days of receipt of this letter and provide monthly updates thereafter until resolved.

5. My point of contact is DCC Christopher Keplinger, (757) 444-3520 ext 7122, or e-mail Christopher.keplinge@navy.mil.

A. J. Johnson

Copy to:  
Operational Commander, inspected unit  
Commandant (CG-7212)

**DORA DISCREPANCY/RECOMMENDATION/COMMENT LIST**

1. Administration

a. Area reviewed:

(1) Inspector(s):

(2) Results/Discrepancies:

(3) Comments:

(4) Recommendation:

2. Material Condition

a. Area reviewed:

(1) Inspector(s):

(2) Results/Discrepancies:

(3) Comments:

(4) Recommendation:

3. Inspectors Comments:

## Sample Memorandum of Notification

U.S. Department of  
Homeland Security

United States  
Coast Guard



United States Coast Guard  
Naval Safety Center

375 A Street  
Norfolk, VA 23511  
Phone: (609) 972-3707

3150

### MEMORANDUM

From: A. B. Smith, CPO  
NAVSAFECEN

Reply to CPO Smith  
Attn of:

To: USCGC KUKUI (WLB-203)

Subj: DIVING OPERATIONAL READINESS ASSESSMENT (DORA) NOTIFICATION

Ref: (a) Coast Guard Diving Policies and Procedures, Volume I, COMDTINST M3150.1  
(Series)  
(b) U.S. Navy Diving Manual, SS521-AG-PRO-010

1. USCGC KUKUI (WLB-203) is scheduled for a DORA from 21-23 June 2010. The DORA provides a critical assessment of operational diving proficiency and compliance with approved procedures in accordance with References (a) and (b). The purpose of this inspection is to enhance the safety of diving operations at your unit.

2. The DORA Team will be composed of the following personnel (this list is not complete as there may be other representatives):

- a. LEAD INSPECTOR
- b. NAVY MASTER DIVER
- c. PROGRAM REPRESENTATIVE
- d. ANY OTHER INSPECTORS

3. You will be required to demonstrate dives in accordance with References (a) and (b). The DORA must include operational dives by each of your teams (3-6 person teams). The DORA must include operational dives for each of the following systems:

- a. Self Contained Underwater Breathing Apparatus (SCUBA)
- b. AGA Full-Face Mask in SCUBA mode

4. Operational dives shall be conducted in accordance with References (a) and (b) and emergency procedure drills will be imposed during the DORA to evaluate the diving team.

5. On the first day of the DORA, an in-brief will be held with the DORA Team, Command Cadre, Dive Officers, and Dive Team Leaders to discuss the conduct of dive operations and the general schedule. At that time, each member of the DORA Team shall be provided a folder containing the following information:

- a. Schedule of events.

Enclosure (2) to COMDTINST M3150.3

- b. Diving watch bill for all dives to be demonstrated.
  - c. List of all qualified divers assigned including: name, level of diver qualification, all dive station qualifications.
  - d. List of known dive-related administrative, qualification, and personnel deficiencies.
  - e. List of known diving related material deficiencies that are currently Tagged-Out.
  - f. List of outstanding departures from specification and any system operation waivers in effect.
6. A review of administrative records will be conducted; all records, instructions, and manuals, will be inspected. Have the medical department provide the team with a Medical Readiness Report (MRR) of the dive locker. The MRR should include the percentage of completed dive physicals, Periodic Health Assessment and Not Physically Qualified personnel.
  7. A material inspection of all diving gear will be conducted prior to commencing diving operations. Dive gear shall be out and ready for inspection in a convenient location.
  8. Oral interviews may be conducted for Diving Supervisors and possibly divers. Comprehensive written examinations will be provided and graded from the DORA Team to all divers.
  9. During actual diving operations, the Commanding Officer will retain complete responsibility for conduct of the divers and safety of personnel. The Commanding Officer shall be briefed on the possible scenarios that are planned for the course of the week by the DORA Team.
  10. A space of sufficient size to accommodate the DORA Team should be provided throughout the DORA for deliberations, findings development, and feedback preparations. Sufficient parking should also be provided for the DORA team. Subsequent to the completion of the DORA, a debrief will be provided to the Command Cadre and the Diving Officers.
  11. Any questions should be directed to CPO A.B. Smith.

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Copy: COMDT (CG-7212)  
CGLO NDSTC  
D14 (DPW)

## Sample Corrective Action Memorandum for Resolution of Discrepancies

U.S. Department of  
Homeland Security

United States  
Coast Guard



Commandant  
United States Coast Guard

Unit Address  
Staff Symbol:  
Phone:  
Fax:  
Email:

3150

### MEMORANDUM

From: #####, CDR  
CG MSST 91109

Reply to LT #####  
Attn of: (619) ###-####

To: COMDT (CG-7212)  
Thru: (1) DOG

Subj: CORRECTIVE ACTION FOR RESOLUTION OF DORA DISCREPANCIES

Ref: (a) Coast Guard Diving Policies and Procedures Manual, Volume I, COMDTINST M3150.1 (series)  
(b) NAVSAFECEN Letter 3150 of 15 Apr 11

1. In accordance with Reference (a), the following corrective actions have been taken to resolve the discrepancies listed in Reference (b):

a) In response to the discrepancy: *"Unit has inadequate cold weather diving equipment."*

Additional cold weather equipment was procured, serialized and entered into our maintenance program. This equipment is now sufficient to meet our cold water diving mission in accordance with the NAVSAFECEN checklists.

b) In response to the discrepancy: *"1 of 3 unit diving supervisors failed the operational drill imposed on the dive team."*

Remedial diving supervisor training has been conducted for the supervisor who failed the operational drill imposed. Additionally, training has focused more specifically on differential diagnosis of diving disorders, in accordance with your recommendation, and implemented more frequently for all diving supervisors.

2. In accordance with Reference (a), the following discrepancy is not yet resolved: *"Dive team does not have the required number of First Class Divers as per Coast Guard Diving Policies and Procedures Manual, Volume I, COMDTINST M3150.1 (Series)."*

MSST SD has contacted Enlisted Personnel Management (EPM) and the Dive Program Manager Commandant (CG-7212) Office in order to request an additional First Class Diver. EPM and Commandant (CG-7212) have noted our request but remain unable to provide personnel with this qualification.

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