

144-032

Is the verification of compliance with design standards, as described in 46 CFR 144.145, similar to plan review and approval conducted for other inspected vessels?

Yes. The verification of compliance with design standards is the process in which an authorized entity, as described in 46 CFR 144.140, verifies that proposed construction plans for a towing vessel comply with all applicable standards. Towing vessels subject to Subchapter M must have their construction or modification plans verified for compliance with design standards prior to construction or modification.

Received Sep 2016

Answered 19 Oct 2016

144-033

What is the difference between design verification and plan review by a Professional Engineer or Authorized Classification Society under NVICs 10-82 or 10-92?

When verification of compliance with design standards is conducted by a licensed professional engineer (PE) in accordance with 46 CFR 144.140, this work is not conducted under the guidance of Navigation and Vessel Inspection Circular 10-92, CH 2 *Coast Guard Recognition of Registered Professional Engineer Certification of Compliance with Coast Guard Requirements*. Plans, drawings, schematics, calculations or other documents used to verify compliance with design standards need not be submitted to the Coast Guard for final approval or authorization.

Similarly, when verification of compliance with design standards is conducted by a classification society in accordance with 46 CFR 144.145, the work is not conducted under the guidance of Navigation and Vessel Inspection Circular 10-82, CH 2 *Acceptance of Plan Review and Inspection Tasks Performed by the American Bureau of Shipping for New Construction or Major Modifications of U.S. Flag Vessels*. Notification to the Coast Guard of the verification activities conducted by the authorized classification society need not be made to the Marine Safety Center.

Received Sep 2016

Answered 19 Oct 2016

144-034

Can I still use the Coast Guard survey option if I have used a PE or Authorized Classification Society to conduct design verification?

Yes, provided that proof of design verification is presented to the Coast Guard at the time which Form CG-3752, "Application for Inspection of U.S. Vessel" is filed with the cognizant OCMI. The OCMI may conduct further review of plans in order to determine objective evidence that the design complies with applicable requirements.

Received Sep 2016

Answered 23 Nov 2016

144-035

Can I use multiple individuals or entities to provide objective evidence of compliance with applicable requirements?

Yes, provided that each individual or entity clearly identify which plans, drawings, schematics, calculations, or other documents were verified including the information required by 46 CFR 144.145(b) (1)-(5). However, since vessel stability, structures, and systems are often interrelated, it is the owner or managing operator's responsibility to inform the individuals or entities verifying the plans of any changes in related plans. Compliance with the requirements of 46 CFR 144.145 (b) may appear on the verified document itself, or in a cover letter. In either case, the verification must be accompanied by the signed and date seal/stamp of the authorized entity. If the verification statement is contained in a cover letter, the letter must also include a list of all applicable plans by number, title, and revision/alteration. An original signature, certification and seal/stamp will not be required on copies of each document provided that the certification is legible; however if the certification is done with a raised seal on an original plan, the information contained thereon must also be reproducible on all copies.

Received Sep 2016

Answered 19 Nov 2016

144-036

I wish to have the Coast Guard conduct design verification, how do I start the process?

If the owner or managing operator chooses the Coast Guard option, he must first submit Form CG-3752, "Application for Inspection of U.S. Vessel," to the cognizant OCMI where the construction will take place. The local OCMI will then provide guidance as to which plans are required for submission and identify which, if any, will be forwarded to the MSC for review.

If the owner or managing operator chooses the external TSMS option, plans must be provided to the OCMI and the TPO conducting the survey.

If the owner or managing operator chooses the internal TSMS option, plans must be provided to the OCMI and made available to the TPO conducting audits.

Received Sep 2016

Answered 19 Oct 2016

144-039

1) Can an existing towing vessel, which has selected the TSMS option, be expected to meet new vessel standards?

2) Are the requirements for means of emergency escape under § 144.500 applicable to existing vessels?

1) No. An existing vessel cannot be required to meet new vessel standards in situations where the regulations provide separate standards for each. However, an existing vessel is not precluded from voluntarily adopting new vessel standards.

2) § 144.500 discusses three potential paths for addressing means of escape:

1. Two means of escape are required where practicable in each space where crew may be quartered or normally employed.
2. A single means of escape is required if a space meets the provisions of § 144.515.
3. Arrangements on an existing vessel may be retained if it is impracticable or unreasonable to provide two means of escape.