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United States Coast Guard

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MEMORANDUM

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Reply to Attn of: Mr. Ed Lacy
(504) 671-2151

To: Distribution

Subj: INSPECTIONS OF EMERGENCY EVACAUTION DRILLS ON MANNED FACILITIES[1] WITH LIFEBOATS (BOATS)

Ref: (a) 33 CFR 146, Subpart B & Subpart C

(b) IMO MSC.1/Circular 1206/ Rev 1 "Measures to Prevent Accidents with Lifeboats"

(c) Navigation and Vessel Inspection Circular No. 04-07 "Servicing and Maintenance of Lifeboats, Launching appliances and On-load Release Gear"

(d) IMO MSC.1/Circ. 1486/Corr.1 "Guidelines on Alternative Methods for Lifeboat Drills on MODUs"

(e) Offshore Operators Committee Guidance "Alternatives to Lifeboat Loading" dated 03 April 2018

1. **PURPOSE**: This policy letter provides guidance to Eighth District OCS inspectors for verifying compliance with reference (a) regarding lifesaving equipment and emergency evacuation drills on manned facilities engaged in OCS activities.

2. **DIRECTIVES AFECTED**: D8(ocs) Policy Ltr 04-2016 dated 31 October 2016 is cancelled.

3. **BACKGROUND**: On 31 October 2016 the Coast Guard Eighth District Outer Continental Shelf Division published D8(ocs) Policy Ltr 03-2016 in response to a National Offshore Safety Advisory Committee (NOSAC) final report called "Lifeboat Safety" dated November 18, 2015. During policy implementation both industry and the Coast Guard identified potential improvements to this policy, including the removal of Coast Guard approval for procedures best captured by an OCS facility's governing safety management system and the need to provide additional guidance on alternatives to lifeboat loading. On April 3, 2018 the Offshore

[1] For definition of manned facility see 33 CFR 140.10. This includes Mobile Offshore Drilling Units (MODUs) when in contact with the seabed of the OCS for exploration or exploitation of subsea resources and when personnel are routinely accommodated for more than 12 hours in successive 24 hour periods.

Operator's Committee (OOC) published guidance on alternatives to lifeboat loading. This policy incorporates the OOC Guidance as an alternative acceptable to the Coast Guard for purpose of compliance with 33 CFR 146.125. The OOC guidance was primarily intended for manned platforms and floating OCS facilities and addresses the type of lifeboat systems installed on those units. However, the alternatives to boat loading listed in the guidance may also be applied to MODUs; MODU operators may choose to incorporate this voluntary guidance into their procedures.

4. **POLICY**:

General

a. For manned facilities (facilities) the default method for verifying compliance with reference (a) includes a Coast Guard inspector witnessing an emergency evacuation drill (drill) where the assigned crew launches a primary lifesaving device into the water. Facilities may use alternatives to this; suggested alternatives are described in this policy. Alternatives should be documented in the facility's governing safety management system.

Maintenance of Equipment and Witnessing of Drills

b. All primary lifesaving equipment should be properly inspected, maintained and operated. When facilities are equipped with lifeboats, inspectors should recommend units follow reference (b) Annex 1 and reference (c) to assist in assuring proper performance of this equipment.

c. If an inspector is on a facility that has not had a drill witnessed by the Coast Guard in over a year, the inspector should witness a drill prior to departing the facility. Any drill witnessed by a Coast Guard inspector should include lowering and (weather and operations permitting) launching of at least one primary lifesaving device. A facility may satisfy the drill requirement by implementing alternate means in accordance with references (d) and (e). An inspector should witness performance of alternate means to verify these programs are working as per the facility's governing safety management system. Where lifeboats are equipped, a lifeboat should be the primary lifesaving device launched. For lifeboats lowered by means of falls the procedures found in Annex 2 of reference (b) should be followed. This includes:

i. First, lowering and raising the lifeboat **without persons** on board to ascertain that the arrangements function correctly; and

ii. Second, ensuring proper operation and releasing of release gear by:

A. lowering the lifeboat into the water with only the number of persons on board necessary to safely release and operate it (see reference (b), Annex I, paragraph 2.4); or **as an alternative means**, using properly arranged/rated hanging-off pennants to operate the releasing mechanism while the release gear is not under load (see reference (b), Annex I, paragraph 2.5). Note: while it may not be possible to launch a lifeboat in the presence of an inspector

due to weather or operations, the facility should generally launch every lifeboat at least once a year, and the governing safety management procedures should provide for this.

iii. Once the lifeboat is released, the inspector will confirm proper operation of the lifeboat's sprinkler system and propulsion system/ maneuverability. The facility **may use alternate means** to demonstrate proper operation should weather and operations not permit release of the lifeboat into the water. Alternative means to demonstrate proper operation of the lifeboat's release gear/mechanisms, sprinkler system and propulsion system/ maneuverability (via engine throttle control and rudder movement) should be documented in an appropriate manner (i.e., addressed in the facility's governing safety management system, documented in emergency drill procedures, recorded in logbooks, etc.).

d. If no evidence exists the facility conducted a drill using the procedures of (4)(c) of this policy (and launched each lifeboat) within the last year, the inspector should issue a requirement to do so. The requirement will ensure the designated crew exercises the equipment as if in an actual emergency in the presence of an inspector or through the use of documented evidence. Dated video, record of crew performance or written attestation by the master, offshore installation manager or designated person-in charge are some examples of acceptable evidence. When drills are performed offshore to clear discrepancies, the facility operator should provide advance notice to the inspector for onsite witnessing of such activities.

Verification of Assigned Crew Competency

e. The inspector should ascertain crew competency. At a minimum, this should include inspecting the record of drills and any resulting performance documentation/notes, training records, and any record medium (e.g. video) that may demonstrate competency within the last quarter. The inspector should verify whether the facility conducted a drill using the procedures of (4)(c) of this policy within the last quarter.

f. Unless the facility utilizes an alternative, if the facility has not conducted a drill using the procedures of (4)(c) of this policy within the last quarter the inspector should issue a requirement to do so. The requirement will ensure the designated crew will perform the drill as if an actual emergency, in the presence of an inspector or through the use of documented evidence. Dated video, record of crew performance or written attestation by the master, offshore installation manager or designated person-in charge are some examples of acceptable evidence. When drills are performed offshore to clear discrepancies, the facility operator should provide advance notice to the inspector for onsite witnessing of such activities.

g. The facility **may use alternate means** to augment crew training such as simulators described in reference (d). The alternative should be documented in the facility's governing safety management system and include documentation of crew members with designated lifesaving

responsibilities having participated. Where alternatives are used the inspector should not issue a requirement as described in paragraph (4)(f) of this policy.

Loading of Lifeboats

h. In an actual emergency, timely loading and launching of lifeboats is critical. Lifesaving Appliance Code (LSA) and Code of Federal Regulations give 3 minutes as a design criterion for lifeboat loading. This can be considered a guideline and it is presumed higher capacity lifeboats will take longer to load in an orderly fashion.

i. Each facility should conduct a drill to fully load a lifeboat under time critical conditions at least annually. This is provided they have at least one lifeboat that has been fitted with certified safeguards to allow the full loading of the lifeboat and prevent against accidental lowering or release of the lifeboat. Training should be provided to all parties so they understand how to embark and strap into a lifeboat.

j. The operator may have a policy, or the OIM/Master/PIC may determine there are unsafe conditions that prevent the full loading of a lifeboat. When this is the case the inspector should ensure persons on board possess adequate knowledge on how to embark lifeboats to include proper entry. The operator of a manned OCS facility may use an alternative procedure to that described in paragraph (i) of this policy letter for this purpose. It should demonstrate facility personnel are familiar with their essential duties during an abandonment and can safely abandon the facility in a timely manner. The Coast Guard has examined the procedures of reference (e) and found them acceptable for this purpose.

k. Should an inspector identify a failure of basic lifeboat loading knowledge by any person on board a facility, the inspector should issue a written requirement for the facility operator to correct it.

Lifeboats on Manned Platforms

l. When installed on manned platforms, lifeboats and related systems should comply with reference (a). Operators may not “tag out” lifeboats for prolonged durations. “Out-of-service” lifeboats should be removed from the platform and the muster area in way of the previously positioned lifeboat should be provided with railings or other fall prevention arrangements complying with 33 CFR Part 142. The davit and winch may be left in place with cable/ring removed from the winch. Station Bill(s) should be updated to reflect the removed lifeboat(s).

Expanded Safety Management System Examinations

m. Should deficiencies in primary lifesaving capabilities be observed during inspections, immediate redress of potential conditions of noncompliance should be undertaken to fully restore

those capabilities. Deficiency notifications (e.g. CG-835-v) and/or operational restrictions may be issued.

n. If the crew fails to demonstrate competency or if the lifeboat or related systems have materiel deficiencies, the inspector should expand inspection efforts to include review of the lifeboats and review of applicable processes or practices to verify overall compliance. Inspectors should examine the safety management system (SMS) or safety and environmental management system (SEMS) program as applicable.

o. Where only SEMS programs are applicable, the inspector should notify D8(ocs) who may refer findings to BSEE.

5**. POINT OF CONTACT**: Questions regarding this policy may be directed to Mr. Ed Lacy at (504) 671-2151.

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Reference (e) to D8(ocs) Policy Ltr 03-2016 Rev 1

Alternatives to Life Boat Loading

OOC Guidance Document USCG-052018 Rev. 1

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1 Overview

Coast Guard inspectors witness emergency drills on offshore platforms during scheduled inspections and at other times. Their purpose for doing this is to assess the competency of the crew and the crew's ability to react to a variety of common emergency scenarios. Furthermore, the Coast Guard relies on a few regulatory cites to require abandon platform drills and to verify the ability of the crew to board a lifeboat and secure themselves in an efficient and orderly manner. Regardless of the regulatory oversight component of this issue, it is imperative that platform personnel are properly trained to perform emergency and abandon platform duties at any time. This training primarily takes place during or immediately after emergency or abandon platform drills.

Familiarization with the operational aspects of the lifeboats and how to safely board them is essential to this training. However, the nature of the environment in which fixed and floating platforms operate poses unique challenges not experienced by traditional merchant vessels. Unlike merchant vessels, platforms cannot release, maneuver, and raise a lifeboat in a sheltered area provided by a port/harbor or stabilize the boat via the use of a painter line while the vessel is underway and provide a lee side from wind and waves. Also, the lifeboat launching systems on fixed and floating platforms pose other challenges not found in lifeboat applications such as those found on traditional merchant vessels. The cantilever style davits on offshore applications do not have the kinds of safeguards found on other types of lifeboat davit systems. The cantilever style davit holds the boat over, and provides a direct path to, the water surface. The only mechanism preventing the boat from lowering to the water is the winch brake. Boats are often fitted with maintenance pendants (a.k.a. maintenance strops) and while they provide an additional safeguard, they are primarily used to support a limited number of persons, who board the lifeboat to perform routine inspection and/or maintenance activities.

Occasionally when witnessing abandon platform drills, a Coast Guard inspector will ensure platform personnel are able to properly board the lifeboat and that the boat can safely accommodate the maximum number of persons it is rated to carry. Historically, the Coast Guard has used the cite found in 46 CFR §108.540(d) to have operators prove the boat can be boarded by its full complement of persons.

> *46 CFR §108.540(d) Each lifeboat must be arranged to be boarded by its full complement of persons within 3 minutes from the time the instruction to board is given.*

It should be noted that this cite is only applicable to Floating Offshore Installations (FOIs). Further, the time stated is more realistically suited for the lesser capacity lifeboats that were common when this cite was last amended in 1998 and not for the much larger boats in use today. Regardless, the ability for a platform crew to be able to board and secure themselves in a lifeboat in an orderly and efficient manner is a competency required for any lifeboat application, whether on a floating or fixed facility. The partial or full loading of personnel on a lifeboat should be undertaken with extreme caution and safeguards should be employed to minimize the risk that accidental lowering or component failure could have to the occupants.

2 Relevant Requirements

The requirements in 33 CFR Subchapter N apply to both fixed and floating platforms. Specifically, 33 CFR §143.120 requires that FOIs meet the MODU design and equipment regulations in 46 CFR 107 (Subpart C) and 46 CFR §108, as well as the vessel marine and electrical engineering regulations at 46 CFR Subchapter F and 46 CFR Subchapter J.

The only applicable Coast Guard requirement governing the frequency of emergency drills is 33 CFR §146.125. It requires emergency drills to be conducted once per month *"…as if an actual emergency existed"* and that *"All personnel should report to their respective stations and be prepared to perform the duties assigned to them."*. The Coast Guard usually interprets this phrase to include lowering, releasing/launching, and operating the lifeboats in the water even though the wording of the regulation clearly indicates there is no expectation to load, lower, and launch lifeboats at every emergency drill. As an alternative, the Coast Guard has generally accepted the lowering, launching, and operating of the lifeboats in the water on a quarterly basis as cited in 46 CFR §109.213(d)(3) even though 46 CFR Part 109 is not applicable to fixed and floating platforms.

Notwithstanding the regulatory requirements to conduct emergency drills monthly, many floating platforms elect to conduct emergency and abandon platform drills weekly and to lower, launch, and operate their lifeboats in the water quarterly, weather permitting. Many fixed platforms elect to conduct emergency and abandon platform drills weekly; however, they lower, launch, and operate their lifeboats in the water less frequently than floating platforms. Some fixed platforms lower, launch, and operate their lifeboats in the water on an annual basis. Although 33 CFR Subchapter N does not specify an exact launching frequency requirement, the quarterly lowering, launching, and operating of lifeboats in the water by personnel on fixed platforms is recommended to maintain familiarity with the equipment. Despite the fact the Coast Guard regulations for fixed and floating platforms are not clear in this regard, the issues are the same. The equipment needs to be exercised and personnel need to be familiar with its operation. Safety and operational issues with lifeboats are the same regardless of platform type with the re-hooking and recovery of the boat posing the most risk due to the fact the boats cannot be stabilized via a painter line like a lifeboat being launched from a traditional merchant vessel can be.

Recently, the Coast Guard has interpreted 33 CFR §146.125 to include the loading lifeboats to ensure the crew can load it in an orderly and efficient manner. Furthermore, the Coast Guard expects that this can be done in the time requirement given in 46 CFR §108.540(d) even though this regulation is not applicable to fixed platforms.

Despite the regulatory ambiguity on this issue and the different ways the Coast Guard has historically viewed fixed platforms and FOIs, operators ultimately have the responsibility to ensure their lifeboats are operational and their personnel know how to use them. This includes ensuring the boat can be safely loaded with persons to its rated capacity in an orderly and efficient manner. The purpose of this Guidance Document is to provide operators with Coast Guard accepted alternatives to partially or fully loading their lifeboats in the stowed position.

3 The Case Against Loading Boats

Accidents with lifeboats are well documented and they continue to occur with alarming frequency on merchant ships and in the offshore oil and gas industry worldwide. While it is recognized most of these accidents have to do with human error (i.e. lack of training/familiarity and poor maintenance) it also needs to be recognized a lifeboat is an imperfect mechanical system. Even the most well-maintained boat operated by the best trained crew can still pose risks. The full loading of a lifeboat in the stowed position to satisfy a timed requirement or prove a design capacity is not a practice seen on regular merchant ships, and some offshore operators have policies against doing it based on the results of a risk analysis. Done without certified safeguards in place this should be viewed as a low-risk/high consequence activity.

When active, installed lifeboats are used for this purpose, those systems on merchant ships are usually designed to provide additional safeguards against accidental lowering or component failure (e.g. harbor

pins, preventer bars, gripes, etc.). As discussed, the cantilever davit launched boats found on offshore platforms lack these safeguards. Also, boats on offshore platforms are typically of much larger capacity than those found on merchant ships and they are stowed at a much greater height.

The issue of loading boats in the stowed position seems to be an issue of debate in the GOM; however, it was the subject of a risk assessment performed by Step Change in Safety (UK) in late 2001. It culminated in a cross-industry risk assessment that was summarized in a Guidance Document and a safety alert (SADIE Alert 436…now known as the Incident Alerts Database). While this document is not currently available on the Step Change for Safety website, it can be found on the Coast Guard's Homeport site at:
https://homeport.uscg.mil/Lists/Content/Attachments/592/Ref%207%20-%20Loading_of_Lifeboat_Guidance1.pdf

The issue of loading boats during drills was also the subject of a National Offshore Safety Advisory Committee (NOSAC) Task Statement in 2015. That report also references the Step Change in Safety Guidance document. The NOSAC report can be found here:
https://homeport.uscg.mil/Lists/Content/Attachments/592/NOSAC%20-%20Final%20Report%20for%20the%20SC%20Safety%20of%20Persons%20Assigned%20to%20Lifeboats%20%20%20%2018%20November%2015.pdf

Ultimately, the workgroup that analyzed this issue for the Step Change in Safety risk assessment made the following conclusions:

- Lifeboat loading drills provide a significant reduction in evacuation risk
- Training exercises carried out offshore on installation survival craft expose crewmembers to risk
- The evacuation risk reduction achieved by offshore drills is greater than the risk experienced due to offshore drills
- Alternative methods for achieving crew training are preferred to the offshore drills option
- Further risk reduction can be achieved by optimizing crew training methods

The report also includes the safety alert it prompted (SADIE Alert 436, Issued April 24, 2003). That alert contained several recommendations but key among them was recommendation #5 which states:

> *"Fully loaded drills are only to be carried out when a lifeboat cannot fall, e.g. with the lifeboat in an unsuspended state, not over water and with the boat solidly supported either on the deck or in other suitable hard landing area (or onshore)."*

The OOC agrees with this analysis and strongly recommends alternatives to loading lifeboats in the stowed position be implemented by its member companies. As described above, the routine loading of personnel above the minimum number required to operate the boat is not a practice seen in other lifeboat applications (i.e. on merchant vessels). The loading (routine or not) of personnel to prove lifeboat capacity and/or familiarity with loading techniques is best accomplished using a boat suited for this purpose as provided by a shore-based training provider. Alternatively, operators may wish to ensure the adequacy of certified safeguards such as maintenance pendants to allow partial loading of a small number of personnel to accomplish the same objectives. More details on this will follow in this Guidance Document.

4 Coast Guard Policy

In October of 2016, the Outer Continental Shelf Officer in Charge, Marine Inspection (OCS-OCMI) issued Policy Letter 04-2016. This policy provides inspection guidance to USCG OCS inspectors for verifying compliance with 33 CFR 146 relative to the inspection of lifesaving equipment and the witnessing of emergency evacuation drills on OCS manned facilities. Paragraph 3.h of this policy states:

> *"Each facility should conduct a drill to fully load a lifeboat under time critical conditions at least annually **if** they have at least one lifeboat that has been fitted with certified safeguards to allow the full loading of the lifeboat and prevent against accidental lowering or release of the lifeboat. Training should be provided to all parties so they understand how to embark and strap into a lifeboat. **If the operator has a policy against the full loading of a lifeboat** for drill/training purposes **without** certified safeguards in place, the inspector should ensure person on board **possess adequate knowledge on how to embark lifeboats to include proper entry**."* (emphasis added)

Since the publication of this policy it has been unevenly applied by USCG OCS Inspectors in the field. In some cases, this led to operators being issued USCG "835" requirements to prove the boats could be loaded even if a company had policy against it. The policy also doesn't recognize that some operators put restrictions on loading their boats in the stowed position even with certified safeguards in place.

The OOC feels USCG direction to fully load active lifeboats in the stowed position (with or without safeguards) with personnel to prove boat capacity and the competency of the boat complement to load the boat is in direct conflict with long-held and well-established sound marine practices that specifically prohibit this activity. It also appears to run counter to the Coast Guard's own policy in their Marine Safety Manual (Volume II), Section B, Chapter 1 which states: *"personnel should not be permitted to be used in the tests that load the boat to or beyond rated capacity, except as is absolutely necessary to load or unload the boat, or perform some part of the test once the boat has reached the water."*. While it is recognized this policy is presented in the context of conducting lifeboat weight tests (e.g. the 110% overload test), the concept is the same and it is clear the Coast Guard also recognizes the risks in loading boats with personnel. The OOC feels this is an activity and competency that is best developed using shore-based training in lifeboat models specially designed for this purpose.

The OOC also recognizes that this capability is limited amongst shore-based training providers in the GOM. Further, this type of training isn't specifically mandated or uniform in application. This type of training is best suited as a component of the water survival portion of HUET which is generally required (by company policy) of just about everyone who works offshore in the GOM.

Frequent discussions between the OOC and various operators with the USCG has highlighted the need for industry established alternative practices that can be implemented to meet the intent of this Coast Guard policy.

5 Recommended Alternatives to Life Boat Loading

The OOC recommends the implementation of the following alternative procedures and practices:

5.1 Use of Maintenance Pendants

It is not recommended for operators to use maintenance pendants with a view to provide enough capacity to fully load the boat in the stowed position. Rather, maintenance pendants are recommended to be used for an identified minimum number of persons necessary to board the lifeboat for maintenance and training purposes. Operators should ensure maintenance pendants can be affixed to each boat.

Operators should also evaluate the rated capacity of these pendants, associated attaching gear (e.g., shackles, pins, etc.), and the attachment points on the boat releasing gear and the davit structure and apply a prudent Safety Factor (a SF of 6 is normally used for lifesaving apparatus). Operators should confirm the pendants, gear, and attaching points are adequate to hold the weight of the empty boat and its equipment. Any excess capacity provided should be enough to establish how many persons can safely load the boat with these safeguards in place.

5.2 Weight Tracking

The muster list for each boat should be continuously updated with each person's weight from the flight manifest (or other source). The total POB (persons on board) weights for each boat should be constantly monitored to ensure they do not exceed the "B" weight of the boat. The "B" weight is the approved weight of the boat, it's equipment, supplies, and the weight capacity of persons it is rated to carry. The majority of GOM operators have voluntarily de-rated their boats to comply with a "GOM Standard" weight of 210 lbs (95 kg) per person. Operators will need verify the standard to which their boats are rated. The other approved standard is 181.5 lbs (82.5 kg); however, this is obviously not representative of the weight of the average offshore worker on the U.S. OCS. The 210 lb "GOM Standard" also equates to a 21-inch seat width whereas the 181.5 lb standard is a 17-inch seat width.

5.3 Weight Management

The impact larger average person weights are having to a given lifeboat muster list should be carefully evaluated. If weight tracking shows the "B" weight is being exceeded, steps should be taken to move personnel to other boats or to reduce POB altogether. Persons much larger that the rated average person weight of the boat (either 181.5 or 210 lbs) should be carefully assessed to ensure they can safely strap into the provided harnesses. If a seat belt/harness is too small, it will be necessary to replace it with a belt which can accommodate the range of persons who may need to use the lifeboat and this may reduce the overall seating capacity of the boat. Seating location should also be considered so as not to group larger average weight persons together but instead try to disperse them amongst persons of lower average weight so that the seating capacity of the boat can be used to maximum potential. It is understood this can be a sensitive issue but if not addressed, it may pose serious consequences to the primary lifesaving capacity and compromise the design and function of the lifeboat.

5.4 Platform Orientation

Every person who is new to a platform already receives a company mandated orientation. Part of this orientation should also include an overview of the lifeboats to include putting that person into the boat and providing training on the proper methods of loading the boat during a full evacuation. Each platform should take that into consideration and allow as many persons as necessary for training and familiarization to board the boat as allowed by the maintenance pendants installed for that boat (see Use of Maintenance Pendants above).

5.5 Training on Board and Seating Patterns

During drills and other training events, training should be provided on the most orderly and efficient way to board the lifeboat. This training needs to consider the access point(s) and seating arrangements of the particular boat models on the platform. All applicable boat manufacturer guidance shall be followed and boats that are assigned fewer persons than their full rated capacity will need to take that into account so the load is balanced as much as possible. Designating persons to assist in traffic flow and seating is highly recommended.

5.6 Seating Charts

Seating charts that show flow patterns for each boat should be mounted at each boat muster station (primary and secondary).

5.7 Shore-based Training

To the maximum extent possible, all personnel should attend shore-based training at a facility that has a lifeboat training model installed at their site. These boats can be safely loaded to capacity and are installed for this purpose. Ideally, training of this type would be built into HUET training but that remains to be fully developed

The development of other alternatives to fully loading the boat in the stowed position is encouraged. The Coast Guard will likely ask questions about what alternatives an operator has in lieu of full boat loading. Platform personnel should be able to easily and competently demonstrate they have these alternatives in place and they are routinely practiced. Of primary importance; however, is that these alternatives are in place for the safety of personnel at all times and not just when the regulator is asking.

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