




16711/OCS
D8(ocs) Policy Ltr 01-2018
05 JUN 18

From: 
J. D. REYNOLDS, CAPT
CGD EIGHT (D8) OCS OCMI

Reply to Mr. Ed Lacy
Attn of: (ocs)

To: Distribution

Subj: GUIDANCE ON SPAR LIFERAFT INSTALLATIONS

Ref: (a) 54 FR 16198, Coast Guard Notice of proposed rulemaking, Lifesaving Equipment, April 21st 1989
(b) 61 FR 25272, Coast Guard Interim Rule with request for comments, Lifesaving Equipment, May 20th, 1996

1. **DIRECTIVES AFFECTED:** None.
2. **PURPOSE:** This letter provides guidance on liferaft installations on SPARs with a degree of safety comparable to installations on seagoing vessels compliant with 46 CFR 108.525(a)(2) and 108.530(c).
2. **BACKGROUND:** The governing regulation for liferaft installations on SPARs is 33 CFR 143.120, published on March 4, 1982. At the time no SPARs existed on the outer continental shelf, floating OCS facilities were in the concept phase and the applicable regulation referred to, 46 CFR 108 Subpart E, did not require float free liferafts in addition to lifeboats (see enclosure 1). 46 CFR 108 Subpart E was amended via references (a) and (b) but the affected population conducting OCS activities considered was only OSVs and MODUs. The revision did not address floating OCS facilities or SPARs. The construction and arrangement and operation of SPARs fundamentally differs from MODUs and OSVs. MODUs and OSVs are not permanently moored and do not process oil and gas continuously. Therefore, the assumptions and points of reference behind the rulemaking did not consider these fundamental differences.
The D8 OCS OCMI requested the OOC conduct an analysis of liferaft installations on SPARs when a SPAR operator requested reconsideration for a deficiency to correct an installation that does not float free. The OOC provided that analysis in enclosure 2. It pointed out SPARs are not seagoing vessels, SPAR intact and damage stability generally exceeds seagoing vessels and the risk of fire and explosion generally exceeds seagoing cargo vessels. The enclosed OOC analysis provides guidance on SPAR liferaft installations that corresponds to this risk profile. In particular, installation on a lower deck allows the liferafts to be located in proximity to the required egress ladders to the water surface and provides shielding from sources of potential fire and explosion.
3. **POLICY:** Liferaft installations on SPARs in a float-free arrangement on top of its hull, on or outboard of the rail to facilitate manual deployment, provide a degree of safety comparable to installations on seagoing vessels compliant with [46 CFR 108.525\(a\)\(2\) and 108.530\(c\)](#) (refer to 33 CFR 140.15).

Subj: GUIDANCE ON SPAR LIFERAFT INSTALLATIONS

16711/OCS
05 Jun 18

POINT OF CONTACT: Questions regarding this policy may be directed to the Eighth District OCS staff at (504) 671-2151.

#

Encl: (1) 43 FR 56824, 46 CFR 108 Subpart E as it existed on March 4, 1982
(2) Offshore Operator's Committee (OOC) Guidance Document USCG-052318 Rev. 1 of 24 May 18, "Life Rafts on SPARS"

Dist: Sector Mobile
Sector New Orleans
MSU Morgan City
Sector Houston/Galveston
MSU Port Arthur
MSU Texas City
Sector Corpus Christi

Copy: COMDT (CG-CVC)
Marine Safety Center
OCS National Center of Expertise
D8 (dp)
BSEE GOM Region
Offshore Operators Committee