




16711/OCS
D8(ocs) Policy Ltr 04-2016
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MEMORANDUM

From: 
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Reply to POC
Attn of: CDR Brian Khey

To: Distribution

Subj: LIFESAVING INSPECTION AND EMERGENCY EVACUATION DRILLS ON MANNED FACILITIES¹ (INCLUDING MOBILE OFFSHORE DRILLING UNITS) ON THE OUTER CONTINENTAL SHELF (OCS)

Ref: (a) 33 CFR 146, Subpart B & Subpart C
(b) Life-Saving Appliance (LSA) Code as amended by IMO Resolution MSC.320(89), paragraphs 4.4.7.6.4 to 4.4.7.6
(c) IMO MSC.1/Circular 1206/ Rev 1 "Measures to Prevent Accidents with Lifeboats"
(d) Navigation and Vessel Inspection Circular No. 04-07 "Servicing and Maintenance of Lifeboats, Launching appliances and On-load Release Gear"
(e) IMO MSC.1/Circ. 1486/Corr.1 "Guidelines on Alternative Methods for Lifeboat Drills on MODUs"

1. **PURPOSE:** This policy letter provides guidance to Eighth District inspectors for verifying compliance with reference (a) regarding lifesaving equipment and emergency evacuation drills on manned facilities on the OCS. The term manned facility includes MODUs attached to the OCS.
2. **BACKGROUND:**
 - a. On November 18, 2015, the National Offshore Safety Advisory Committee (NOSAC) submitted a final report titled "Lifeboat Safety", making a number of recommendations to the Coast Guard aimed at improving safety for the maintenance, testing and operation of lifeboats on manned facilities and MODUs. Among other things, the report cited loss of life from accidents during routine drills and routine maintenance activities involving the launching and recovery of davit launched lifeboats utilizing "on-load" release mechanisms.
 - b. The International Community identified poor performance of some "on-load" release mechanisms as a problem. Subsequently the IMO amended the SOLAS Convention² and reference (b) to require evaluation of, and in some cases, replacement of existing "on-load" release mechanisms used on lifeboats and rescue boats.

¹ For definition of manned facility see 33 CFR 140.10.

² See SOLAS Regulation III/1.5

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- c. The Emergency Evacuation Plan (EEP), and the lifeboats and related systems identified in that Plan, are critical for ensuring all persons on board can be evacuated should a catastrophic marine or well integrity incident occur.

3. **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 to this should be documented in the facility's approved EEP.

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 (c) Annex 1 and reference (d) 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. Where davit launched lifeboats are equipped, a davit launched lifeboat should be the primary lifesaving device launched. For lifeboats lowered by means of falls the procedures found in Annex 2 of reference (c) 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 (c), Annex I, paragraph 2.4); or
 - B. **as an alternative**, using properly arranged/rated hanging-off pennants to operate the releasing mechanism while the release gear is not under load (see reference (c), Annex I, paragraph 2.5).
 - iii. If no evidence exists the facility conducted a drill using the procedures of (3)(c)(ii)(A) of this policy 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 a inspector or through the

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- 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
- iv. Third, 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 should be documented in the facility's EEP, emergency drill procedures & logs.

Verification of Assigned Crew Competency

- d. 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 (3)(c)(ii)(A) of this policy within the last quarter.
- e. Unless the facility utilizes an approved alternative, if the facility has not conducted a drill using the procedures of (3)(c)(ii)(A) 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 a 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.
- f. The facility **may use alternate means** to augment crew training such as simulators described in reference (e). The alternative should be documented in the approved EEP and include documentation of crew members with designated lifesaving responsibilities having participated. Where approved alternatives are used the inspector should not issue a requirement as described in (3)(e) of this policy.

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Loading of Lifeboats

- g. 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.
- h. 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 persons on board possess adequate knowledge on how to embark lifeboats to include proper entry.
- i. Should an inspector identify failure of basic knowledge, a written requirement should be issued to certify each member assigned to a lifeboat has participated in a drill of this type either at a facility or vessel offshore, or at a shoreside facility lifeboat training prop or simulator. The person in charge should provide an opportunity for the inspector to witness and/or participate in a lifeboat loading drill of this type, upon request.

Lifeboats on Platforms

- j. No Coast Guard requirements exist mandating certificated lifeboatman on fixed facilities (platforms), however facility operators may elect to provide such certified persons.
- k. When installed on platforms, lifeboats and related systems should comply with reference (a). For non compliant platforms, inspectors should consult the OCMI for an appropriate period of time to come into compliance.
- l. 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) and/or operational restrictions may be issued.

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- 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.
4. **POINT OF CONTACT**: Questions regarding this policy may be directed to any member of my staff at (504) 671-2268.

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