



16711

PCV Policy Letter 06-06

*Michael B. Karr*

From: M. B. Karr, CAPT  
COMDT (G-PCV)

SEP 26 2006

To: Distribution

Subj: GUIDELINES FOR SHIPS REFLAGGED UNDER THE MARITIME SECURITY PROGRAM PARTICIPATING IN THE UNDERWATER SURVEY IN LIEU OF DRYDOCKING PROGRAM

Ref: (a) Navigation and Vessel Inspection Circular (NVIC) 1-89, Underwater Survey Guidance

1. Purpose. To update the Coast Guard's policy regarding the compliance of a vessel reflagged under the Maritime Security Program (MSP) with reference (a) in order to participate in the optional Underwater Survey in Lieu of Drydocking (UWILD) program.
2. Directives affected. None.
3. Action. Officers in Charge, Marine Inspection (OCMIs), and/or authorized classification societies will require all MSP reflagged vessels that wish to enroll in or continue participation in the optional UWILD program, to complete the requirements for entry (or program continuation) at the next out of water drydocking. This includes any unscheduled drydockings due to a casualty, maintenance availability or other reason. The vessel need not be drydocked for the express purpose of meeting the requirements of this letter. For existing MSP vessels, if the next drydock examination is the intermediate examination and would normally have been scheduled as a UWILD examination, then the examination may be completed (as a UWILD) without drydocking. Regardless of whether the outfitting requirements have been completed, all vessels undergoing a UWILD should request and complete it in accordance with the process described in the reference (a). This policy letter is posted electronically at: [www.uscg.mil/hq/g-m/moc/docs](http://www.uscg.mil/hq/g-m/moc/docs)
4. Background. Since 1988 the Coast Guard has permitted vessels to complete underwater surveys of vessels as an alternative to an out of water drydocking exam. Underwater surveys are optional and are to be completed in accordance with applicable drydocking regulations or the Alternate Compliance Program (ACP) supplement (for ACP enrolled vessels), and reference (a). MSP vessels have been permitted to continue to complete UWILDs without compliance with the Coast Guard requirements of reference (a), but instead by only meeting the classification societies requirements for a UWILD. Reference (a) provides reliable guidelines to assist with the examination of the underwater portion of the hull. Some of the requirements include: hull markings to enable both the diver and the inspector/surveyor observing the video feed to remain oriented during the exam; sea chests to be fitted with hinged gratings to ensure that these critical portions of the vessel's hull can be adequately accessed and examined and also details water clarity guidelines to assure good underwater visibility.

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Furthermore, compliance with the NVIC ensures that a thorough plan is developed beforehand to address the method of taking rudder bearing clearances, the method of blanking sea chests for sea valve removal, and the method of taking tailshaft bearing wear-down measurements, among other items.

5. Implementation. This policy will be implemented according to the following schedule:

- a. **New MSP reflaggings (after the date of this letter)**: Vessels must complete all of the requirements in reference (a) prior to being permitted to complete a UWILD for credit.
- b. **Previously reflagged vessels due for Intermediate drydocking survey (after the date of this letter)**: Vessels may complete a credit UWILD, however, in order to continue participation in the program, all of the elements listed in reference (a), must be completed during the next out of water drydocking. A Special Note should be entered in the MISLE vessel file that the requirements of reference (a) should be completed at the next out of water drydocking in order to be eligible for continued participation in the UWILD program.
- c. **Previously reflagged vessels due for drydocking for Special Survey (after the date of this letter)**: Vessels should meet all of the UWILD requirements listed in reference (a) during the drydocking in order to be eligible for continued participation in the UWILD program.

MSP vessel owners should be briefed on this policy and the requirements of reference (a) during the reflagging process in order to ensure communication of the Coast Guard's UWILD expectations.

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16711/NVIC 1-89

## MEMORANDUM

SEP 11 2006

From: (G-PCV-1)

*J. Hannon*  
*Acting*

Reply to G-PCV-1  
Attn of: J. Hannon  
202-372-1222

To: G-PCV

*MBC 9/26*

Thru: G-PCV-1

Subj: BACKGROUND INFORMATION REGARDING THE REASONS FOR  
PUBLISHING A MSP UWILD POLICY LETTER

1. You asked me to answer these questions to help you decide if we need to publish a Policy Letter and to use these answers to document why we will create a new work instruction by including answers to these questions in our Policy letter file:

Question 1: Is the policy letter a solution to a non conformity? If so, what is the Non-Conformity?

Answer: There is inconsistency and confusion within the CG and the Authorized Class Societies regarding if and when the CG UWILD program applies to the U.S. flagged vessels enrolled in various programs.

Question 2: What specifically is the problem?

Answer: Even vessels belonging to the same company can , have different UWILD policies applied to them such that some are eligible for UWILD and other are not.

Question 3: What exactly were the complaints?

Answer: The class societies and CG field inspectors have found this to be an extremely confusing area because over time changes in unofficial policy have resulted in inconsistent enforcement postures.

Question 4: Is it the lack of a policy or a problem with applying a policy that covers the UWILD process for MSP vessels?

Answer: The problem is there are too many previous policies and interpretations currently in play. This makes it difficult to identify THE policy for this issue.

Question 5: Do we already have a policy that covers UWILD for MSP vessels?

Answer: There is a UWILD policy for ACP vessels and other U.S. flagged vessels, but they don't address how those current policies apply to MSP vessels.

Question 6: Does current policy cover MSP UWILD and we have not applied it?

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Answer: Current policy does not address MSP vessels.

Question 7: Does requiring the UWILD process as required in the proposed policy letter conflict with the intent of the MSP law?

Answer: The MSP law addresses the reflagging policy, but does not address the follow-on inspection procedures. The upcoming Reflag/MSP NVIC is designed to address that void in guidance and ensure greater consistency in MSP inspections. This policy would maintain consistency across the U. S. fleet on the UWILD standards as ACP vessels are also required to comply with NVIC 1-89.

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