



USCG Office of Commercial Vessel Compliance (CG-CVC) Mission Management System (MMS) Work Instruction (WI)



Category	Inspected Vessel Program				
Title	Drydock Examinations (DE), Underwater Survey in Lieu of Drydocking (UWILD) and Drydock Extension (DDE) Policy Clarifications				
Serial	CVC-WI-029(1)	Orig. Date	8Jan21	Rev. Date	N/A
Disclaimer:	This guidance is not a substitute for applicable legal requirements, nor is it itself a rule. It is not intended to nor does it impose legally-binding requirements on any part. It represents the Coast Guard's current thinking on this topic and may assist industry, mariners, and the Coast Guard, as well as other federal and state regulators, in applying statutory and regulatory requirements. You can use an alternative approach for complying with these requirements if the approach satisfies the requirements of the applicable statutes and regulations. If you want to discuss an alternative approach (you are not required to do so), you may contact the Coast Guard Office of Commercial Vessel Compliance (CG-CVC) at CG-CVC@uscg.mil which is responsible for implementing this guidance.				
References:	<p>(a) Marine Safety Manual Volume II (MSM II) – Materiel Inspection, COMDTINST M16000.7B, Change 2, Section B, Chapter 3, Paragraph A.1. (see second note).</p> <p>(b) MSM II, Section A, Chapter 3, Paragraph H.3.c., Hull examination and drydock details</p> <p>(c) MSM II, Section B, Chapter 3, Paragraph A.4.d.</p> <p>(d) Navigation and Vessel Inspection Circular 1-89 dated 15MAR1989</p> <p>(e) Title 46, Code of Federal Regulations (CFR), § 137.322</p> <p>(f) 46 CFR § 137.335</p> <p>(g) 46 CFR § 137.300</p> <p>(h) 46 CFR § 31.10-21</p> <p>(i) 46 CFR § 71.50-3</p> <p>(j) 46 CFR § 91.40-3</p> <p>(k) 46 CFR § 107.261</p> <p>(l) 46 CFR §§ 115.600, 115.615, and 115.675</p> <p>(m) 46 CFR § 126.140</p> <p>(n) 46 CFR §§ 169.229 and 169.230</p> <p>(o) 46 CFR §§ 176.600 and 176.615</p> <p>(p) 46 CFR § 189.40-3</p> <p>(q) MSM II, Section B, Chapter 3, Paragraph B.2</p>				

A. Purpose. This work instruction provides guidance to District Prevention Staffs (dp), Officers in Charge, Marine Inspection (OCMIs), and the Towing Vessel National Center of Expertise (NCOE) concerning matters relating to drydock exams (DEs), underwater surveys in lieu of drydocking (UWILD), and drydock extensions (DDEs) for all inspected vessels.¹

B. Background.

1. CG-CVC, Districts, and OCMIs each have a role in the administration of vessel drydocking requirements. The assignment of credited and next drydock dates often forms the basis for a vessel owner or operator to schedule drydock availability and plan for a pause in vessel operations. As such, consistency in assigning drydocking intervals for all classes of inspected vessels is important for compliance with the regulatory scheme and to minimize impacts to commercial business. Additionally, given that certain items relating to DEs and UWILDs are

¹ This includes vessels inspected under 46 CFR Subchapter M.

not specifically addressed in 46 CFR Subchapter M, this document provides guidance that is consistent with other inspected vessels.

2. For the purposes of drydock and internal structural exam surveys, the phrase “prior to commencing activities” (as used in 46 CFR 137.315) means 30 days prior to commencing actual work conducting a drydock exam or internal structural exam. Where a 30 day notice is not possible, it means as soon as practicable.
3. For the purposes of drydock and internal structural exam surveys, the term “unsafe condition” includes a condition or threat to a vessel’s seaworthiness, safety, or fitness for service or route, that requires immediate corrective action. For example, vessel damage that was not previously detected, but is evident when the vessel has been removed from the water requires notification to the cognizant OCMI pursuant to 46 CFR 137.325.

C. Action. District Prevention Staffs (dp), OCMI and the NCOE should reference this guidance when addressing DEs and DDEs for all inspected vessels.

D. All inspected vessels: The requirements for DEs and UWILDs for each inspected vessel class are specified in references (e)-(p).

1. Dates for credit DEs. Consistent with guidance found in reference (a), credit for the DE should be given on the date that all requirements of the exam are met (and not the date on which the exam began).
2. Dates for next required DEs. In accordance with reference (b), the “Next Exam” date should be set to the last day of the month that the exam is due. The forward migration of the DE dates from COI to COI should be avoided. When the credit date for a DE extends beyond the required DE exam date into a following month, the “Next Exam” date should be based on the allowable period from the “Last Exam.” For example: if the drydock examination is due by 31May but the examination is actually conducted (credited) 10Jun, the “Next Exam” date should reflect same month of when the examination was due. So, the “Next Exam” date shall reflect 31May (not 30Jun). Likewise, Internal Structural Examinations (ISE) and Cargo Tank Internal Examinations (CTIE) should be credited for the date all requirements are met and the allowable period should be based on the “Last Exam”².
3. Change from saltwater interval to freshwater interval. Except for Small Passenger Vessels (46 CFR Subchapter T and K³), the following applies to all inspected vessels:
 - a. DE dates should not be extended when the vessel moves from a saltwater interval to a freshwater interval until the vessel completes the current saltwater DE cycle AND the vessel will remain in a freshwater interval for at least a five-year period.
 - b. Where the vessel cannot meet the five-year freshwater interval requirement, the DE interval should remain as a saltwater interval.
4. Approval of DDEs.
 - a. Enclosure (1), DDE Authority Table, provides the level within the Prevention program hierarchy that can approve DDE for various classes of inspected vessels, to include towing vessels.

² The revised drydock and tailshaft regulations do not apply to 46 CFR Subchapter T and Subchapter IA vessels.

³ See 46 CFR 176.600(c) for Subchapter T requirements and 46 CFR 115.600(c) for Subchapter K requirements.

- b. Pursuant to reference (c), District Prevention Officers (dp) should NOT further delegate DDE approval authority to OCMI's. Where extenuating circumstances exist, CG-CVC should be consulted.
 - c. The COI should not be amended following an approved extension of a DD, ISE or CTIE. The approval letter shall be entered into the documents for the corresponding MISLE activity and a special note added indicating the new date for the granted extension.
5. Multi-service vessels. Where a given vessel is certificated under multiple subchapters, the highest level in the Prevention program hierarchy that would be involved in the approval of DDE for any of the subchapters, should be the approving entity for any DDE requested by the vessel. For example, a vessel certificated under "R" and "T" requesting a DDE must obtain Commandant (COMDT) approval for a DDE, regardless of the length of extension requested. Additionally, if there is a difference in the DE requirements, the more stringent criteria should apply.

E. Subchapter "M" specific clarifications:

- 1. DDEs are not required for a towing vessel without a COI, as a drydock interval has not been specified for such a vessel.
- 2. Major conversions. When extensive upgrades are made, it is appropriate to check for a major modification determination from the Marine Safety Center.
- 3. For vessels with a COI employing the Coast Guard option.
 - a. As noted in enclosure (1), OCMI's may grant a DDE for a towing vessel with a COI for a period of up to 1 year, provided a visit by a Marine Inspector (MI) to the vessel is completed.
 - b. This visit should include an interview of the vessel's Master and/or Chief Engineer to obtain their opinion on the vessel's hull, shafting, propellers, steering gear and associated machinery. As part of this visit, the MI should examine the vessel and conduct an internal structural examination to the extent necessary to validate the condition of the vessel is, in their opinion, satisfactory for the extension requested and agrees with the opinion of the vessel's Master.
 - c. Drydocking in excess of requirements. In accordance with reference (q), the OCMI should be contacted so that they can be made aware of the circumstances warranting the drydocking. If the drydocking is not for full credit, a MI may examine the underwater hull structure and fittings to the extent practicable under the circumstances.
- 4. For vessels with a COI employing a Towing Safety Management System (TSMS) Option.
 - a. A TPO cannot grant a DDE for a towing vessel as this authority has not been delegated to a TPO as noted in enclosure (1). A TPO's input will be considered when the OCMI takes the matter under consideration.⁴
 - b. In lieu of an interview, the Master and/or Chief Engineer and their TPO should provide a written statement attesting that the vessel is in suitable condition for operation during the

⁴ The OCMI may consider input from the vessel's Third Party Organization (TPO) in lieu of MI attendance when determining whether to extend the vessel's drydock due date. This input should include, but is not limited to, an onsite visit from an appropriately qualified TPO surveyor and a written recommendation to extend the drydock due date.

period of the requested extension. TPOs should visit the vessel and conduct an internal structural exam to ensure the vessel's condition agrees with written statements provided.

- c. Drydocking in excess of requirements. Consistent with reference (q), the TPO should be contacted so that a TPO surveyor may examine the underwater hull structure and fittings to the extent practicable.
5. Enrollment in a Coast Guard UWILD program. Prior to requesting enrollment into the Coast Guard UWILD program, a towing vessel should show compliance with reference (f) and, per reference (d), undergo a pre-survey out-of-water drydocking, in the presence of an OCMI, or their representative.
- a. Per references (e) and (g), an out-of-water hull exam conducted by a Recognized Organization (RO) may be used to receive credit for a required drydock exam. This pre-survey⁵ out-of-water exam may be conducted by a RO for a variety of reasons including as a condition of maintaining class or for a load line and may have been conducted prior to the vessel obtaining a COI.
 - b. For an RO pre-survey out-of-water exam to receive Coast Guard credit, it should have occurred within 3 years before the vessel obtained its COI, for a vessel in saltwater service, and within 5 years before the vessel obtained a COI, for a vessel in freshwater service.
 - c. In cases where the RO pre-survey out-of-water hull exam has been accepted as a Coast Guard credit exam, the vessel's owner or managing operator may request to enroll in a Coast Guard UWILD program, prior to the vessel obtaining a COI.
 - i. As noted above, a MI should attend a pre-survey drydocking that would occur at the vessel's next out-of-water exam.
 - ii. In the interim, the vessel may undergo a one-time UWILD using class rules prior to this pre-survey drydock.
 - d. Once enrolled in a Coast Guard UWILD program, the vessel will alternate between out-of-water drydocks (supervised by a class society surveyor and accepted per reference (e)) and Coast Guard or RO supervised UWILDs that meet the intervals specified by applicable regulations. For example, using a saltwater interval, the vessel will undergo an out-of-water pre-survey drydock, then an intermediate UWILD at the 2.5-year timeframe, then an out-of-water exam at the 5-year point, followed by a UWILD approximately 2.5 years later. See enclosure (2) for UWILD intervals based on service area.

M. Edwards
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By direction

Encl: (1) Drydock Extension (DDE) Approval Authority Table
(2) UWILD Interval Tables for Freshwater and Saltwater service

⁵ For additional discussion on pre-survey examinations, see reference (d).

Drydock Extension (DDE) Approval Authority Table

46 CFR Subchapter	Vessel Service	DDE ≤30 days	30<DDE≤90 days	DDE>90 days	DDE ≤ 6 months	2 nd 6 month DDE	DDE ≤ 12 months	DDE > 12 months
D, O, & I	Tank, Freight, & Misc. (including tank barges)	OCMI	District (dp)	COMDT				
H	Passenger	COMDT	COMDT	COMDT				
I-A	MODUs				OCMI	District (dp)		COMDT
L	Offshore Supply	OCMI	District (dp)	COMDT				
R	Nautical School	COMDT	COMDT	COMDT				
U	Oceanographic Research	COMDT	COMDT	COMDT				
K and T	Small Passenger ¹						OCMI	COMDT
M	Towing						OCMI	COMDT
Various	Great Lakes						District (dp)	COMDT

Note 1: It is recognized in MSM Volume II that inland passenger vessels on benign routes may obtain DDEs up to 30 months duration (approved by Commandant). Requests equal to or less than 12 months can be approved by the OCMI. Requests greater than 12 months must be approved by Commandant (see MSM II, page B3-7).

UWILD Interval TablesInterval table for vessels in **freshwater service**

	Year "0"	5 years from Initial Drydock	5 years from date of UWILD	5 years from date of drydock exam
Exam type	Pre-survey & initial drydock exam	UWILD	Drydock exam	UWILD

Interval table for vessels in **saltwater service**

	Year "0"	2.5 years from initial drydock***	2.5 years from UWILD***	2.5 years from drydock exam***
Exam Type	Pre-survey & initial drydock exam	UWILD	Drydock exam	UWILD

*** The 2.5-year number is an approximation. A vessel in saltwater service is required to undergo two drydock exams in a five year period (unless the vessel has been approved for a UWILD). No more than three years may elapse between any two examinations.