



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(2)	Orig. Date	8Jan21	Rev. Date	1Feb23
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:	(a) Marine Safety: Marine Inspection Administration, COMDTINST 16000.70 (b) Marine Safety: Domestic Inspection Programs, COMDTINST 16000.71 (c) Navigation and Vessel Inspection Circular 1-89 dated 15MAR1989				
Change Summary:	<ul style="list-style-type: none"> • Revised process for determining <i>Next Exam</i> date for all inspected vessels • Expanded applicability of paragraph D.3 to include small passenger vessels • Improved document organization for accuracy and readability 				

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) relating to administration of drydock exams (DEs), underwater surveys in lieu of drydocking (UWILD), and drydock extensions (DDEs) for inspected vessels.

B. Background.

1. CG-CVC, Districts, and OCMIs each have a role in the administration of drydocking requirements. The assignment of *Last Exam* and *Next Exam* for drydocking 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 administering DE intervals is important for compliance with the regulatory scheme and to minimize impacts to commercial business.
2. Minimum DE intervals are found in each inspection subchapter within 46 CFR and can be divided generally into two types: “once every X” and “twice-in-five.” Vessels subject to a “once every X” interval include all small passenger vessels and most vessels operating on freshwater routes that must have an exam once every 1, 2, 5, 10, or 15 years, as applicable. Vessels subject to a “twice-in-five” interval include most tank, passenger, cargo, and towing vessels operating in salt water and all offshore supply vessels that must conduct two exams within any five-year period with no more than three years between any two exams.

C. Action. Districts, OCMIs and the NCOE should reference this guidance when administering DEs and DDEs for all inspected vessels.

D. Guidance for all inspected vessels:

1. **Last Exam date.** Upon completion of an exam, Marine Information for Safety and Law Enforcement (MISLE) should be updated so that the *Last Exam* is the date on which all requirements of the exam are met and not the date on which the exam began (i.e., credit).
2. **Next Exam date.** Follow the steps in a. or b. below, as applicable, to determine the *Next Exam* date. The *Next Exam* date should be entered into MISLE and a COI amendment should be generated. In all cases, after following the steps below, the *Next Exam* date should be set as the last day of the month.
 - a. Vessels subject to a “twice-in-five” DE interval: Follow the process in enclosure (1). Examples are provided in enclosure (2).
 - b. Vessels subject to a “once every X” DE interval: Find the *Next Exam* date by adding the interval as specified in the applicable inspection subchapter to the *Last Exam* date. Then, if an extension was approved, deduct the number of months of extension used (i.e., time between the original due date and the exam start date, rounded to the nearest month). Examples are provided in enclosure (2).
3. **Change from saltwater interval to freshwater interval.**
 - a. A DE date 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 OCMI expects the vessel to remain in freshwater service for at least a five-year period.
 - a. Where the vessel cannot meet the five-year freshwater interval requirement, the exam interval should remain as a saltwater interval.
4. **Approval of DDEs.**
 - a. Enclosure (3) provides the level within the Assistant Commandant for Prevention Policy (CG-5P) program hierarchy that can approval a DDE for each inspection subchapter.
 - b. Districts should not further delegate DDE approval authority to OCMI. If questions arise regarding delegation of DDE approval authority, CG-CVC should be consulted.
 - c. If the DDE approval authority is the OCMI, prior to approving a DDE, the OCMI should ensure a Marine Inspector attends the vessel to examine the vessel and conduct an internal structural examination to the extent necessary to validate that the condition of the vessel is, in their opinion, satisfactory for the extension requested. The attendance 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.
 - d. If the DDE approval authority is District or COMDT, the OCMI should attend the vessel as described in paragraph c. above and provide a recommendation via memo to the approval authority.
 - e. The COI should not be amended following approval of a DDE. The approval letter should be entered into the documents for the corresponding MISLE activity and a special note added indicating the new date for the granted extension.
 - f. OCMI should remind applicants that the duration of DDE used will be deducted when assigning the *Next Exam* date, in accordance with the processes in paragraph D.2. above.
5. **Multi-service vessels.** Each vessel certificated under multiple subchapters is subject to the more frequent exam interval. The extension approval authority is the highest organizational level for the given extension duration for the applicable subchapters. For example, a vessel operating in

saltwater certificated under both subchapters “L” and “T” must undergo a DE every two years (the “T” requirement), since that is more stringent than “twice in five” (the “L” requirement). If, for example, that same vessel requested a DDE of two months, the approval authority would be the District.

6. **Drydocking in excess of requirements.** 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.

E. Additional guidance for Subchapter M:

1. 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.
2. For the purposes of drydock and internal structural exam surveys, the term “unsafe condition” includes a condition or threat to a vessel’s 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.
3. Vessels with a COI employing the Coast Guard option should follow the guidance in paragraph D.4. above.
4. Vessels with a COI employing a Towing Safety Management System (TSMS) Option:
 - a. Third Party Organizations (TPOs) do not have the authority to approve DDEs. A TPO’s input will be considered when the OCMI evaluates the extension request.¹
 - 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 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. The TPO should be notified 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.² Prior to requesting enrollment into the Coast Guard UWILD program, a towing vessel should show compliance with 46 CFR § 137.355 and, in accordance with reference (c), undergo a pre-survey out-of-water drydocking, in the presence of an OCMI or their representative.
 - a. In accordance with 46 CFR §§ 137.300 and 137.322, 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-survey 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

¹ The OCMI may consider input from the vessel’s 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.

² A class society/RO UWILD program is separate from the CG UWILD program. The Coast Guard has not delegated approval authority for enrollment into the CG UWILD program.

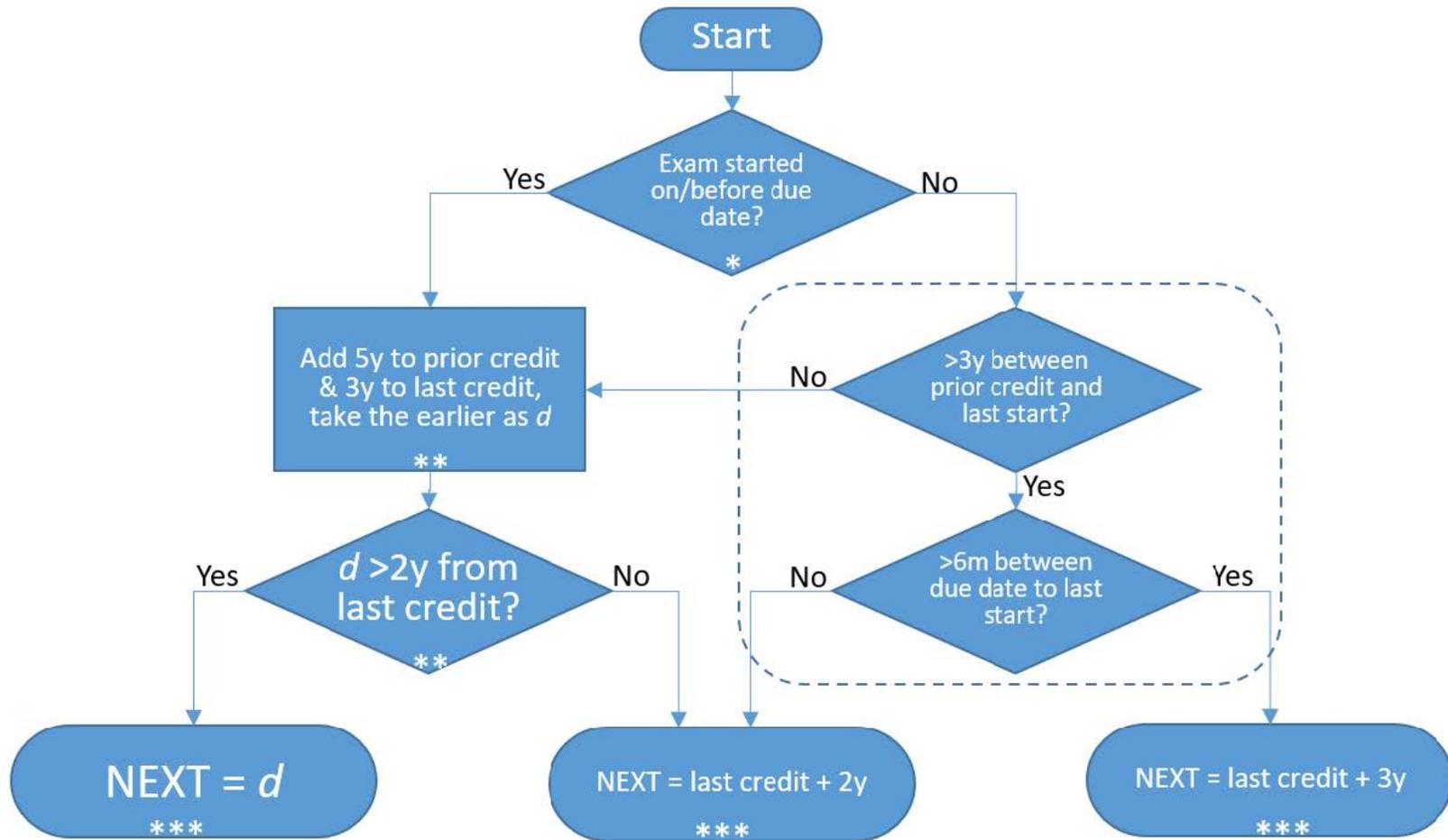
conducted prior to the vessel obtaining an initial COI in accordance with 46 CFR § 136.202.

- b. For an RO pre-survey out-of-water exam to receive credit as an exam required in Subchapter M, it should have occurred within 3 years before the vessel obtained its initial COI, for a vessel in saltwater service, and within 5 years before the vessel obtained an initial 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 an initial 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 TPO or class society surveyor and accepted in accordance with 46 CFR § 137.322) and Coast Guard or TPO/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 (4) for UWILD intervals based on service area.

M. R. Neeland
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By direction

- Encl: (1) Next Drydock Exam: Examples
(2) "Twice in Five" Process Guide
(3) Drydock Extension Approval Authority
(4) UWILD Intervals

“Twice-in-Five” Process Guide



- * Original due date, or, if extension approved, the extended due date
- ** Credit is the date when all the inspection requirements were met.
- *** Subtract extension used (if any, round to nearest month), then go to end of month.

Next Exam: Examples

"Once Every Two" Examples*				
No.	Inputs			Next
	Due <i>Ext. due date</i>	Start	Credit	
1.1	28Feb2003	01Feb2003	14Feb2003	28Feb2005
1.2	28Feb2003	01Feb2003	17Mar2003	31Mar2005
1.3	28Feb2003	15Nov2003	25Dec2003	31Dec2005
When an extension was approved:				
1.4	28Feb2003 <i>31May2003</i>	17Mar2003 <i>Ext. 1 month</i>	25May2003	30Apr2005
1.5	28Feb2003 <i>31May2003</i>	20Apr2003 <i>Ext. 2 months</i>	04Aug2003	30Jun2005
When an exam is not started by the due date:				
1.6	28Feb2003	02Jun2003 <i>Layup: 3 months</i>	04Aug2003	31Aug2005
When an exam is not started by the extended due date:				
1.7	28Feb2003 <i>31May2003</i>	05Nov2003 <i>Ext. 3 months</i> <i>Layup: 5 months</i>	25Dec2003	30Sep2005

*2-year interval used for examples; use same process for other "once in X" intervals

“Twice in Five” Examples*						
No.	Prior	Inputs			Next	Controlling Requirement
		Due <i>Ext. due date</i>	Start	Credit		
2.1	01Jun2000	30Jun2003	01May2003	15May2003	30Jun2005	2-in-5y
2.2	01Jun2000	30Jun2003	01May2003	15Dec2003	31Dec2005	NLT 2y
2.3	01Jun2000	30Jun2003	01Apr2002	15Apr2002	30Apr2005	NMT 3
When an extension was approved:						
2.4	01Jun2000	30Jun2003 <i>31Dec2003</i>	30Oct2003 <i>Ext: 4 months</i>	30Dec2004	31Aug2006	NLT 2y (minus ext.)
2.5	01Jun2000	30Jun2002 <i>31Dec2002</i>	31Dec2002 <i>Ext: 6 months</i>	31Jan2003	30Nov2004	2-in-5 (minus ext.)
When the exam is not started by the due date:						
2.6	01Jun2000	30Jun2002	04Aug2002 <i>Layup: 1 month</i>	04Sep2002	30Jun2005	2-in-5
2.7	01Jun2000	30Jun2003	19Oct2003 <i>Layup: 4 months</i>	01Apr2004	30Apr2006	NLT 2y
2.8	01Jun2000	30Jun2003	10Mar2005 <i>Layup: 20 months</i>	28Sep2005	30Sep2008	NMT 3y
When an exam is not started by the extended due date:						
2.9	01Jun2000	30Jun2003 <i>30Sep2003</i>	05Dec2003 <i>Ext. 3 months Layup: 2 months</i>	15May2004	28Feb2006	NLT 2y (minus ext.)
2.10	01Jun2000	30Jun2002 <i>30Sep2002</i>	05Dec2002 <i>Ext: 3 months Layup: 2 months</i>	14Feb2003	31Mar2005	2-in-5 (minus ext.)
2.11	01Jun2000	30Jun2002 <i>30Sep2002</i>	10Mar2005 <i>Ext. 3 months Layup: 29 months</i>	28Sep2005	30Jun2008	NMT 3y (minus ext.)

*Refer to the flow chart in Enclosure (1)

Drydock Extension (DDE) Approval Authority

46 CFR Subchapter	Vessel Service	DDE ≤30 days	30<DDE≤90 days	DDE>90 days	DDE ≤ 6 months	2nd 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: 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 may be approved by the OCMI. Requests greater than 12 months must be approved by Commandant.

UWILD Intervals

Intervals 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

Intervals 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.