

NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 4-94

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Subj: ELIMINATION OF COAST GUARD PLAN REVIEW FOR NON-CRITICAL ENGINEERING SYSTEMS AND CARGO BARGES

1. **PURPOSE.** The purpose of this Circular is to publish policy that provides for the elimination of Coast Guard review and approval of certain engineering system drawings for all vessels as well as structural drawings for Coast Guard inspected non-self propelled cargo vessels (deck cargo and hopper barges) that have a load line issued by the American Bureau of Shipping (ABS).
2. **DIRECTIVES AFFECTED.** None.
3. **BACKGROUND.** Title 46 Code of Federal Regulations (CFR) Subpart 91.55, Subpart 50.20 and Subpart 110.25 provide the cargo vessel, marine engineering and electrical engineering requirements that govern the submittal of plans affected by this Circular. The plan submittal procedures outlined in this Circular are intended to clarify and simplify the plan submittal process for certain engineering and electrical systems, and cargo barge structural plans.
4. **DISCUSSION.**
 - a. The Coast Guard's Office of Marine Safety, Security and Environmental Protection is continuing efforts to improve efficiency of operations and service to the public and the marine industry. The publication of Navigation and Vessel Inspection Circular (NVIC) No. 10-92, Change 1 in which the Marine Safety Center (MSC) can approve plans and calculations based on a satisfactory review and certification by a registered professional engineer (PE) or by ABS is a recent example.
 - b. This Circular advances this effort by identifying vessel engineering systems that, following review by a Professional Engineer or the American Bureau of Shipping (ABS), no longer need to be submitted to the Marine Safety Center. Factors considered when identifying engineering systems for which this change applies included system simplicity, the ease of compliance verification through the inspection process, and the limited design compliance value added by additional Coast Guard review or technical oversight.
 - c. This Circular also provides for a change in the submittal of structural plans for cargo barges which have a load line assigned by ABS) and are inspected and certificated under 46 CFR Subchapter I. As the load line assigning authority, ABS ensures the major structural components and longitudinal strength are adequate for the intended service. For these barges, additional review of structural plans by the MSC or the OCMI is redundant and unnecessary.

- d. The changes to the plan approval requirements described in this Circular do not eliminate or minimize the application of the regulations to the engineering systems identified or to the structural standards for cargo barges. Rather, the purpose is to eliminate the need for the OCMI or MSC to review drawings of these systems and reaffirms that industry bears the responsibility for regulatory compliance. The vessels and systems affected by this Circular will still be inspected by the OCMI in the course of vessel certification.

5. IMPLEMENTATION.

- a. Coast Guard plan review for the following vessel systems in Title 46 Code of Federal Regulations Subchapter F -Marine Engineering, and Subchapter J - Electrical Engineering is no longer required if they are reviewed and certified by a registered PE or by ABS, in accordance with NVIC 10-92, Change 1, and submitted directly to the OCMI for use during the inspection process. The OCMI will accept these plans as meeting Coast Guard requirements without further plan review unless questions arise during final system inspection and testing. This plan submittal change is applicable to all vessels having a Coast Guard Certificate of Inspection issued under Title 46 CFR.

Subchapter F - Marine Engineering

- (1) Heating Boiler Construction and Controls
- (2) Ballast Piping (Except those tied into the bilge system or ballast piping on a Semi Submersible MODU)
- (3) Tank Cleaning Piping
- (4) Vent, Sound and Overflow Piping
- (5) Sanitary Drains) Soil Drains and Overboard Piping
- (6) Internal Combustion Engine Exhaust Piping
- (7) Refrigeration and Air Conditioning Piping
- (8) Internal Combustion Engine Installations
- (9) Structure of Independent Fuel Tanks not over 400 Gallons

Subchapter J - Electrical Engineering

- (1) Sound Powered Telephones
- (2) Power Operated Boat Winch Installations
- (3) Electric Power Operated Watertight Doors
- (4) Fire Screen Doors Holding Systems
- (5) Supervised Patrol Systems
- (6) Deck Wiring Plans
- (7) Motor Starter Elementary Diagrams

- b. Public Law 103-206 amended Section 3302 of Title 46 U.S. Code so that seagoing cargo barges which are unmanned and do not carry hazardous material as cargo or a flammable or combustible liquid in bulk are no longer required to be Coast Guard certificated. Seagoing cargo barges that do not meet this criteria must still undergo Coast Guard inspection and certification. For those seagoing cargo barges still requiring Coast Guard certification and which are issued a load line by ABS, the structural plans listed in 46 CFR 91.55-5(a)(1) to (a)(12) do not have to be submitted to the Coast Guard for review and approval. The structural review by ABS in the course of issuing a load line is sufficient to ensure the vessel meets the structural requirements of the regulations. The

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drawings reviewed by ABS should be submitted directly to the OCMI for use during the inspection process.

- c. The OCMI will accept the aforementioned engineering system plans and cargo barge plans, under the conditions indicated above, as meeting Coast Guard regulations without further Coast Guard plan review. These plans will not be subjected to the MSC oversight review described in NVIC 10-92, Change 1. Nothing in this Circular limits the authority of the OCMI to require corrections or modifications if, through the normal vessel inspection and certification process, plans are found not to be in compliance with the regulations or contain substantial errors or deficiencies.



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