

## **U.S. Coast Guard Commercial Dive Variance Checklist (46 C.F.R. Part 197)**

- 1) \_\_\_ Cite the specific regulation you are seeking a variance from and then explain why you believe compliance with that regulation is impractical or unreasonable.
- 2) \_\_\_ Identify the alternate equipment, material, apparatus, arrangement procedure, or test you will use and fully explain how it will provide an equivalent level of safety.
- 3) \_\_\_ Provide a detailed explanation of the work the diver(s) will perform.
- 4) \_\_\_ Identify and clearly define all hazards associated with the alternative you proposed.
- 5) \_\_\_ State the date(s) and time(s) the dive operation(s) will commence and conclude.
- 6) \_\_\_ State the number of dive teams, the number of divers per team, the mode of diving for each dive, and include the estimated number of dives per day.
- 7) \_\_\_ State the deepest depth and time at that depth for each dive.
- 8) \_\_\_ State the number of non-diving topside support personnel aboard the vessel, to include medical specialists and chamber technicians.
- 9) \_\_\_ List any PVHO that will be used, to include the type of treatment chamber(s) available for immediate use. Identify the shore-side hyperbolic medical facility designated for an emergency.
- 10) \_\_\_ State the name, IMO/official number, and country of registry for any vessel involved in the dive operation. If not diving from a vessel, provide additional details.
- 11) \_\_\_ State the location of the dive site by the offshore lease block designation, geographic region, and latitude and longitude.
- 12) \_\_\_ Identify the environmental conditions anticipated during the dive operation(s) and any limitations you will place on each dive as a result. "Conditions" include the maximum parameters for sea state, current, and wind: taking into consideration the time of year, location of a dive, depth of a dive, work performed by the diver(s), and any operating limitations of the vessel/unit from which the dive is conducted.
- 13) \_\_\_ If the dive involves liveboating or will be conducted from a dynamically positioned (DP) vessel, reference the ADCI or IMCA procedure(s)/practice(s) you will follow.
- 14) \_\_\_ List the operating and emergency procedures that will be followed in response to an "uncontrolled" movement of a DP vessel/unit (e.g. a vessel drive-off). The Coast Guard has published voluntary guidelines in the Federal Register for MODUs and for vessels other than MODUs operating on the OCS. See 77 FR 26562 and 77 FR 62247, respectively.
- 15) \_\_\_ State the type and frequency of any drills or training you will conduct in preparation for or during this dive operation. If uncontrolled vessel movement and emergency diver recovery are not addressed during these drills or training, please explain why.
- 16) \_\_\_ Submit supporting documentation for items 2, 4, 7, and 14 above. Additional information or documentation may be requested for any checklist item.