

U.S. Department
of Transportation

**United States
Coast Guard**



Commander
Eighth Coast Guard District
Hale Boggs Federal Building

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16703/16711

June 11, 1998

Mr. Mike Lanclos
Operations Engineer
ENSCO Offshore Company
620 Moulin Road
Broussard, LA 70518-9978

Dear Mr. Lanclos:

This is in response to your appeal dated January 20th, 1998 to the Officer in Charge, Marine Inspection (OCMI), Port Arthur regarding marine inspection requirements (CG-835s) issued to the Mobile Offshore Drilling Units (MODUs) ENSCO 64 (D553088) and ENSCO 84 (D637544) to conduct lifeboat releasing gear tests as required by 46 CFR 109.301(i)(5). After carefully evaluating your arguments, and the applicable laws and regulations, I must deny your appeal.

The purpose of the test required by 46 CFR 109.301(i)(5) is to ensure that the lifeboat will release under a load of 110% of the rated capacity of the lifeboat. In an emergency, which may be coupled with a significant sea state, there will likely be a load exerted on the lifeboat release gear during the release. It is critical, therefore, to ensure that the lifeboat's releasing gear will operate properly under these "on-load" conditions. In addition, our experience is that releasing gear problems are often discovered only during this load test.

There may be some misunderstanding regarding the recommended test procedure for the 110% "on-load" lifeboat releasing gear test. The accepted procedure for this test is to lower the lifeboat (with or without the test weight in place) to the water such that the boat's keel and a small portion of the lower hull are actually in the water with tension maintained on the falls. In those instances where the weight was not applied previously, the weight can be applied at this point. The lifeboat is then released by personnel within the boat while "on-load", settling rather than "falling" into the water. By conducting the test in this manner, with properly secured weights, the risk to individuals is minimized. In no case, should the lifeboat be allowed to "freefall" from above water. In addition to the actual in-water lifeboat releasing gear test, Eighth District OCMI's have accepted appropriate "simulations" of the required test as evidence of compliance with 46 CFR 109.301(i)(5). Typically, these tests involve on board testing of the lifeboat releasing gear using a hydraulic or mechanical loading mechanism to simulate the required weight, followed by operation of the releasing gear from within the lifeboat. Survival Systems International has developed an effective releasing gear simulation test procedure for their Whittaker style single fall lifeboats using such a procedure. I am hopeful that manufacturers of lifeboats using two part falls will be able to develop similar equipment and test procedures.

I remain sensitive to your concerns that this required operational test may create a hazardous situation for your personnel and equipment. In recent policy guidance on this subject, I encouraged Eighth District Officers in Charge, Marine Inspection (OCMIs) to use discretion in satisfying this releasing gear test requirement in the offshore environment. Obviously, weather

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conditions will not always allow an actual "in-water" test to be conducted offshore. In such cases, Eighth District OCMI's have issued Coast Guard Inspection Requirements (CG-835s) to demonstrate the releasing gear test at a later date. This provides the MODU operator the opportunity to reschedule the releasing gear test to another date when more benign weather conditions are present. Since the lifeboat releasing gear test described in 46 CFR 109.301(i)(5) is required only once every 5 years (or whenever the releasing gear is overhauled), it may be possible to consolidate this test with the MODU's special examination in lieu of drydocking (SEILOG). Typically, SEILOG examinations are performed in good weather with divers and several support vessels in attendance. This combination of conditions and resources may represent an ideal opportunity to demonstrate an in-water test of the lifeboat releasing gear.

Finally, I realize it is sometimes difficult to predict suitable weather and coordinate the attendance of the lifeboat servicing contractor and a Coast Guard marine inspector to demonstrate the required lifeboat releasing gear test. Therefore, by copy of this letter, I ask Eighth District OCMI's to be flexible in extending outstanding CG-835 items for this requirement if warranted by weather or environmental conditions. In addition, I encourage Eighth District OCMI's to accept certain third party reports on the lifeboat releasing gear weight testing in those cases where they are unable to provide a marine inspector. A satisfactory report from the vessel's classification society surveyor or the lifeboat servicing company should be acceptable for this purpose. Other third party substitutes may be acceptable as well. Acceptability of third party inspectors and test procedures must be discussed with the cognizant OCMI.

Using the procedures discussed above, I am confident that the lifeboat releasing gear weight test required by 46 CFR 109.301(i)(5) can be safely performed in the Gulf of Mexico. If you feel aggrieved by this decision, you may appeal to the Commandant (G-MOC-2), United States Coast Guard, in accordance with 46 CFR 1.03-25. Any such appeal must be submitted via this office within 30 days of your receipt of this decision. It must identify the decision being appealed and the reason the decision should be overturned.

Please contact Lieutenant Commander Bill Daughdrill of my staff at (504) 589-6271 should you have any question or wish to discuss this matter further.

Sincerely,



C. T. DESMOND
Captain, U.S. Coast Guard
Chief, Marine Safety Division
By direction of the Commander
Eighth Coast Guard District

Copy: All Eighth District Coastal MSOs, MSU and MSDs