

U.S. Department
of Transportation

United States
Coast Guard



Commander
Eighth Coast Guard District
Hale Boggs Federal Building

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New Orleans, LA 70130-3396
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16703/46-107
16 September 1999

From: Commander, Eighth Coast Guard District
To: Distribution

Subj: MOBILE OFFSHORE DRILLING UNIT (MODU) LIFEBOAT/CAPSULE
RELEASING GEAR OVERLOAD TESTS

1. Enclosures (1) and (2) are forwarded for your information and use. There are now approved devices for conducting in-place releasing gear overload tests for both single and two fall MODU lifeboats and capsules pursuant to complying with 46 CFR 109.301(i)(5).
2. Enclosure (3) is Commandant's response to the International Association of Drilling Contractor's appeal in this matter. Commandant (G-MOC) advised Eighth District OCMI's to extend outstanding marine inspection deficiency items (CG-835s) for MODU lifeboat/capsule releasing gear overload tests for up to one year while development/approval of alternative in place testing devices proceeded. An approved in-place releasing gear overload test device should now be available for all types of MODU lifeboats and capsules. Accordingly, OCMI's should reexamine any outstanding CG-835s for these required tests and establish reasonable compliance dates.
3. On occasion, Coast Guard marine inspectors are unable to attend the actual in-place releasing gear overload test due to scheduling conflicts. In such cases, OCMI's should consider accepting the written certification of lifeboat manufacturers and servicing companies with Commandant approved in-place releasing gear overload test devices that the required test was conducted and found to be satisfactory.
4. Direct questions in this matter to Lieutenant Commander Bill Daughdrill at (504) 589-6193.


G. D. MARSH
By direction

Encl: (1) COMDT (G-MSE-4) ltr of September 23, 1998 to Survival Systems International
(2) COMDT (G-MSE-4) ltr of August 19, 1999 to Alexander/Ryan Marine & Safety Co.
(3) COMDT (G-MOC) ltr 16711 of 31 March 1999

Dist: All Eighth District Gulf Region MSOs, MSDs and MSU

Copy: COMDT (G-MOC), (G-MSE-4)
MIO Europe
FEACT/MIO Asia

U.S. Department
of Transportation

United States
Coast Guard



Commandant
United States Coast Guard

U.S. Coast Guard (G-MSE-4)
2100 Second St. S.W.
Washington, DC 20593
Phone: (202) 267-1444
FAX: (202) 267-1069
E-mail: RMarkle@comdt.uscg.mil

16714/160.133/SURVIVAL SYSTEMS

16703/46-107

September 23, 1998

Captain George L. Beatty
Survival Systems International, Inc.
P.O. Box 1855
Valley Center, CA 92082

Dear Captain Beatty:

We have reviewed report no. 98-008 forwarded under your letter of September 2, 1998. We conclude that the disengaging equipment test apparatus described in the report, consisting of variants of an hydraulic tensioning device, is satisfactory for demonstrating the proper operation of the various release gear designs in use on Survival Systems International and Whittaker survival capsules. The test apparatus may therefore be used to demonstrate that the disengaging apparatus is operating properly, as required for lifeboats on mobile offshore drilling units under 46 CFR 107.231(b), and as further described in the Marine Safety Manual, Volume II, sections 6.R.3.a(2)(a)(v), 6.R.3.a(3)(a)(vi), and 6.R.3.a(4)(b)

Report no. 98-008 is returned "approved."

Sincerely,

R. L. MARKLE
Chief, Lifesaving and Fire Safety Standards Division
Office of Design and Engineering Standards
By direction of the Commandant

Encl: (1) Report 98-008

Copy: MSO San Diego
CCGD 11(m) w/o encl.
CCGD 8(m) w/o encl

Enclosure (1)

U.S. Department
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United States
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Commandant
United States Coast Guard

U.S. Coast Guard (G-MSE-4)
2100 Second St. S.W.
Washington, DC 20593
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16714/160.133/GEN
16703/46-107
August 19, 1999

Mr. Bob Kahak
Alexander/Ryan Marine & Safety Co.
P.O. Box 9363
Houston, TX 77261

Dear Mr. Kahak:

We have reviewed the various reports, photographs and videotapes relating to your HTJ-100-01 Lifeboat Release Gear Load Testing Fixture. We conclude that the fixture and test procedure described in your letter with enclosures of July 28, 1999, consisting of variants of an hydraulic tensioning device, is satisfactory for demonstrating the proper operation of the various release gear designs in use on lifeboats and survival capsules. The test fixture and procedure may therefore be used to demonstrate that the disengaging apparatus is operating properly, as required for lifeboats on mobile offshore drilling units under 46 CFR 107.231(b), and as further described in the Marine Safety Manual, Volume II, sections 6.R.3.a(2)(a)(v), 6.R.3.a(3)(a)(vi), and 6.R.3.a(4)(b).

Your letter of July 28, 1999, with enclosures, is returned "approved."

Sincerely,

R. L. MARKLE
Chief, Lifesaving and Fire Safety Standards Division
Office of Design and Engineering Standards
By direction of the Commandant

Encl: (1) Ltr dtd July 28, 1999 w/encl.

Copy: MSU Galveston w/o encl.
CCGD 8(m) w/o encl.

Enclosure (2)



16711

MAR 31 1999

Mr. Alan Spackman
Director, Offshore Technical and Regulatory Affairs
International Association of Drilling Contractors
P.O. Box 4287
Houston, TX 77084-0589

Dear Mr. Spackman:

I too am concerned about the safety of crewmembers when conducting 110% load tests on lifeboat release gear in hazardous weather conditions as presented in your letter of July 28, 1998. In that letter you appealed outstanding Merchant Marine Inspection Requirements (CG-835) issued to four members of your association to perform these tests to the Eighth Coast Guard District which in turn forwarded the appeal to me.

I will not rescind the requirements out right at this time, but shall authorize OCMIs to extend the CG-835s for up to one year. I will take this action because there are suitable alternatives to the operational test methods traditionally employed. It is my understanding that approved in-place-testing devices for some lifeboat davit types are now available. Your members should arrange to perform the required test using these approved devices to meet the requirements of Title 46, Code of Federal Regulations 109.301(i)(5) to the satisfaction of an attending marine inspector. Lifeboat in-place-testing devices for the remaining release gear types commonly found in the Gulf of Mexico are currently being reviewed. Extension of current CG-835 for release gear test requirements for 1 year should give the device developers and CG approval authorities ample time to field new devices to cover the remaining gear types. The following options are available to Mobile Offshore Drilling Unit (MODU) operators to meet the testing requirements:

1. Lifeboat releasing gear types with approved in-place test procedure, have the option of conducting a traditional load test (weather conditions permitting) or employ the approved in-place test witnessed by the attending marine inspector.
2. MODU operators which have installed lifeboat types without an approved in-place test procedure for the installed lifeboat shall have their requirements extended for a period of one year from the date of this letter. During the course of the extension, these operators shall ensure operational tests of these lifeboats are conducted monthly. This test shall follow the procedures found in 46 CFR 109.213(d)(5). If any of the affected MODUs enters sheltered water, they shall conduct the releasing gear on-load test immediately to the satisfaction of the attending marine inspector.

Subj: APPEAL OF LIFEBOAT RELEASING GEAR TEST AT 110% CAPACITY

Should you have any questions regarding this matter, please contact LT James Robertson at the (202) 267-0496.

Sincerely,



M. J. PONTIFF
Captain, U.S. Coast Guard
Chief, Office of Compliance
By direction of the Commandant

Copies: CCGD8(m)
MSO New Orleans
MSO Morgan City
MSO Port Arthur
MSU Galveston
MSO Corpus Christi