Test Your FPVE Knowledge – Issue #8

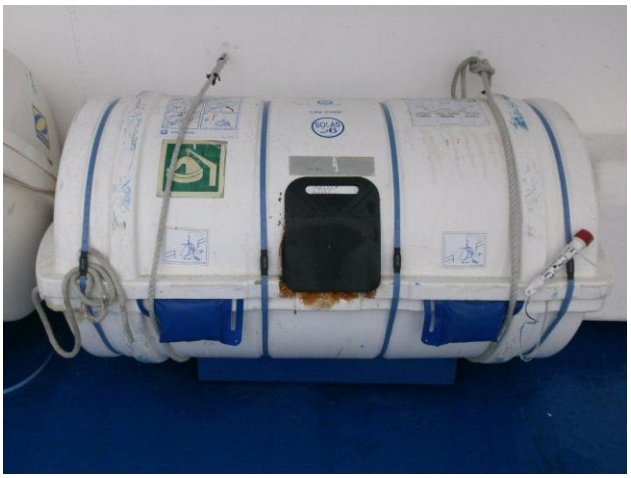

Figure 1

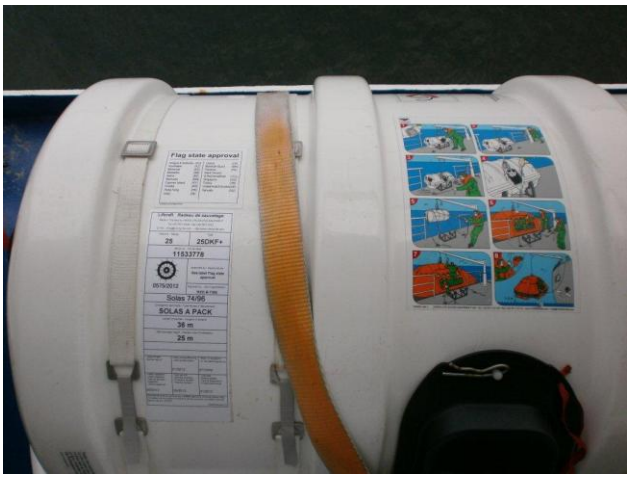

Figure 2

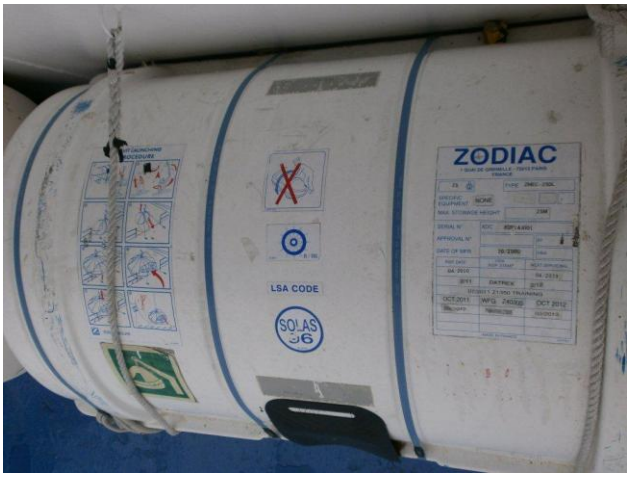

Figure 3

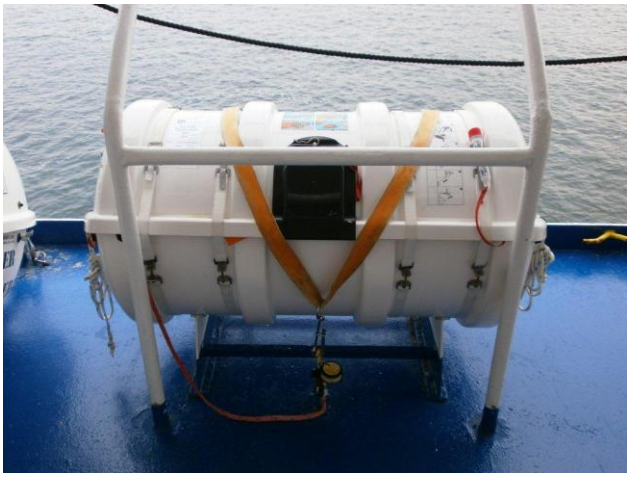

Figure 4

These pictures represent the primary lifesaving rafts (figures 2&4) and the training rafts (figures 1&3) onboard a modern Cruise ship. The rafts are made by 2 different manufacturers, they are the same capacity (25 person), are of similar size, shape and weight; the shackle, and method in which the shackle is accessed, is comparable. This ship recently replaced its full complement of the zodiac brand liferafts with Viking brand liferafts. Two of the zodiac liferafts were kept onboard for training and drill purposes, including being used for practical demonstration during the raft inflation at the ACVE.

QUESTION: Would the zodiac training raft shown above (figures 1&3) be acceptable for the raft inflation witnessed during the ACVE drill on this ship?

REFERENCE: SOLAS Chap. III/Reg. 19 states that; "drills shall, as far as practicable, be conducted as if there were an actual emergency." What does that mean to us as inspectors, as 5 different inspectors could have 5 different points of view as to what is deemed "compliant"; we must look at the intent of the regulation. When, during an ACVE, we witness the inflation of a raft, we are verifying that the crew assigned to that station can perform the functions necessary to safely evacuate the passengers off the ship. We cannot, as examiners, anticipate what difficulties may ensue or what "could possibly happen" therefore basing our findings off of theoretical or hypothetical situations. We must verify that the crew is competent in performing the functions associated with the lifesaving system for which they are trained and assigned.

The guidance that our examiners use during the raft inflation conducted at annual exams, NVIC 03-08, states "they should not accept a training raft unless it is substantially the same size and type of raft as used for primary lifesaving" and that "the inspector should witness the crew rigging liferafts for deployment to ensure the davit arrangement and crew competence is suitable to deploy the required amount of primary liferafts during the 30 minute timeframe allowed by SOLAS."

CSNCOE RESPONSE: Based on the pictures and information provided, pending that the crew can, without assistance or solicitation, perform the functions necessary in regards to the raft inflation; the CSNCOE has no concerns regarding the use of the zodiac rafts being used for practical demonstration at annual exams raft inflations for the purpose of verifying crew competency.

We come to this conclusion based on the intent of the regulation and guidance provided by the NVIC; the purpose of witnessing the raft inflation is to verify that the crew assigned to that raft station can, without assistance or solicitation, perform the functions necessary in regards to the raft inflation. If all the components of the training raft are consistent with those of the rafts that make up primary lifesaving; then competency in a system can be verified.

Let me site you some specific examples: if the ships primary LSA and training rafts both have red painters on the left bottom corner of the container, then the physical aspects have no difference between the two rafts and the crews ability to identify and operate the painter can be verified, similarly; if the size and shape of the shackle and the method in which it is accessed is the same between the two rafts, than the crews ability to access the shackle and attach it to the block can be verified. Remember, we are only verifying the crew's competency in performing their assigned duty; verifying that in an actual emergency, they can perform the necessary functions to operate the ships life saving appliances to which they are assigned.

Please review the following scenario and decide what you would do:

SCENARIO: A ship has 35 person liferafts are davit launched, each raft team is comprised of 4 personnel; (1) Raft Team leader, (1) Raft Team Vice Leader and (2) assistants. Once the CG inspectors arrive at the raft station the team is all present and accounted for, the Safety Officer is on scene and their 12 man training raft, packed in its container, is hooked up to the block ready to raise, the painter line, container line and steering lines are pulled out and tied off to their respective areas. There is a ½" air line running from the raft to a working air valve on deck; this air line will be used to inflate the raft once the raft team has gone through all the procedures documented in their SMS, as it is a training raft without a functioning CO2 inflation valve. Once the CG inspector gives the Safety Officer the green light to start the evolution, things proceed as planned. The Safety Officer is doing a very detailed job of giving the raft crew explicit instructions and when all is prepared and ready, the Safety Officer gives the signal to the bosun to open the working air valve, the raft inflates and the crew bows in the raft. This concludes the evolution.

FINDINGS: The Ship was issued a SOLAS III/19 deficiency noting the following as evidance for its issuance:

a. The raft used was a 12 person raft, which is substantially disimilar in size and weight to a 35 person raft. Therefore the inspectors were unable to verify the crews ability to handle the 35 person rafts they would be required to prepare and launch during an actual emergency.
b. All the lines had alrady been pulled out and tied off as well as the davit being slewed out and the block attached to the shackle. Because of this the inspectors were unable to verify the crews ability to perform this function
c. The Safety Officer shouldn't have been directing the crew during the process as he was not assigned to the raft station and in a real emergency, would not be there.
d. Inflating the raft via a working air line operated by the bosun is not the way the raft was designed nor is the bosun a part of the raft team, therefore the ability of the crew to demonstrate the process in which the raft is inflated could not be verified.

As you can see by the findings listed above, the raft inflation was not, as far as practicable, conducted as if there were an actual emergency (SOLAS III/19).