MSC Guidelines for the Review of Tankship Structural Fire Protection

Procedure Number: C1-23

Revision Date: March 30, 2012

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Purpose
To establish a process for reviewing structural fire protection (SFP) plans submitted for a U.S. flag tankship regulated under 46 CFR, Subchapter D.

References
a. 46 CFR Subchapter D
c. IMO MSC circular 847, Interpretations of vague expressions and other vague wording in SOLAS chapter II-2, June 12, 1998, and MSC/Circ.847/Corr.1
d. Navigation and Vessel Inspection Circular (NVIC) 9-97, Ch-1; Guide to Structural Fire Protection

Contact Information
If you have any questions or comments concerning this document, please contact the Marine Safety Center (MSC) by email or phone. Please refer to the Procedure Number C1-23.

Email:  MSC@uscg.mil
Phone:  202-475-3403
Website:  http://homeport.uscg.mil/msc

Responsibilities
Using applicable portions of references (a) through (e), the submitter shall provide sufficient documentation and plans to indicate compliance with the applicable requirements. The submission shall be made electronically to the above email address or, if paper, in triplicate to the MSC’s address found on the above website. To facilitate plan review and project management, all plans and information specified in these guidelines should be submitted as one complete package through a single point of contact for the project.
General Guidance

- The submitter must indicate whether the vessel is new or existing. No plan review may occur until receipt of a copy of the Application for Inspection. Hard copy plans must be submitted in triplicate, where all spaces must be identified and designated on the plans.

- For tankships not on international voyages, with a keel laying date on or after January 1, 1975, the submitter must check the following requirements:
  - 46 CFR, Subpart 32.56
  - 46 CFR 32.56-20
  - 46 CFR 32.56-21
  - 46 CFR 32.56-22
  - 46 CFR 32.56-25
  - 46 CFR 32.56-35
  - 46 CFR 32.56-40
  - 46 CFR 32.56-50
  - 46 CFR 32.56-55
  - 46 CFR 32.56-60

- For tankships on international voyages, submitter must verify compliance with the applicable sections and paragraphs of the following SOLAS Chapter II-2: Construction – fire protection, detection, extinction regulations:
  - Regulation 9: Containment of Fire
    - Paragraph 2
    - Paragraph 3
    - Paragraph 4
    - Paragraph 5
    - Paragraph 7
  - Regulation 11: Structural Integrity
    - Paragraph 2
    - Paragraph 3
    - Paragraph 4

- For tankships on international voyages and with keel-laying dates after July 1, 1998, compliance with reference (e), the Fire Test Procedure (FTP)
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Code, as cited within SOLAS, is mandatory. In particular, any SFP arrangements that deviate from specified SOLAS construction standards are acceptable only if the alternative arrangement is proven to meet the FTP Code.

Interpretations of vague expressions and other vague wording can be found in reference (c). Additional information can be found in reference (d)

Definition

International Voyage: A voyage from a country to which the present Convention applies to a port outside such country, or conversely. (See SOLAS Chapter I, Part A, General provisions, Regulation 2(d).)

Disclaimer

This guidance is not a substitute for applicable legal requirements, nor is it itself a rule. It is not intended to nor does it impose legally-binding requirements on any party. It represents the Coast Guard’s current thinking on this topic and may assist industry, mariners, the general public, and the Coast Guard, as well as other federal and state regulators, in applying statutory and regulatory requirements. You can use an alternative approach for complying with these requirements if the approach satisfies the requirements of the applicable statutes and regulations. If you want to discuss an alternative, you may contact the MSC, the unit responsible for implementing this guidance.