# U.S. COAST GUARD MARINE SAFETY CENTER PLAN REVIEW GUIDELINE



# REVIEW OF GENERAL ARRANGEMENT PLANS FOR SMALL PASSENGER VESSELS (T)

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# **Purpose**

This Plan Review Guideline (PRG) provides guidance and information to the marine industry regarding the submission of general arrangement plans to the Marine Safety Center for Small Passenger Vessels seeking Certification under 46 CFR Subchapter T.

# **Contact Information**

If you have any questions or comments concerning this document, please contact the Marine Safety Center (MSC) by e-mail or phone. Please refer to Procedure Number H1-07.

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#### 1. Applicability

This Plan Review Guideline (PRG) is applicable to general arrangement plans reviewed by the Marine Safety Center (MSC) for vessels certificated under 46 CFR Subchapter T.

#### 2. References

- a. 46 CFR Subchapter T, Parts 177, 178, & 179
- b. Marine Safety Manual (MSM) Vols. II & IV
- c. 21 CFR Subchapter L, Part 1250
- d. USCG Marine Safety Alert 09-18, "It's just a Slide. What could go wrong? Get seriously injured and you'll sing a different song!" dated June 8, 2018
- e. Policy File Memorandum (PFM) No. 10-85, "Watertight and Weathertight Closure Devices"
- f. Marine Safety Center Plan Review Guide (PRG) E1-03, "MSC Guidelines for Watermist Fire Suppression Systems"
- g. Marine Safety Center PRG E1-06, "MSC Guidelines for Carbon Dioxide Fire Suppression Systems"
- h. Marine Safety Center PRG E1-09, "MSC Guidelines for Fire Main Systems"
- i. Marine Safety Center PRG E2-09, "MSC Guidelines for Fire Detection Systems"
- j. Marine Safety Center PRG E2-23, "Review of Electrical Plans Small Passenger Vessels"
- k. "Fire Safety of Small Passenger Vessels", Interim Rule, 86 Federal Register 73160, December 27, 2021
- 1. Commandant (CG-CVC) Policy Letter 23-03 Change 1, "Covered Small Passenger Vessel' Fire Safety Interim Rule Implementation," dated December 24, 2023

#### 3. Definitions

# a. Weathertight:

Water will not penetrate into the vessel in any sea condition. This also means being able to resist boarding seas. As addressed in reference (e), windows are not accepted as weathertight closures and, without the provision of deadlight covers, must be considered as potential downflooding points. Ball check valves used in tank vent lines are generally accepted as weathertight closures.

# b. Watertight:

Capable of preventing the passage of water through the structure in any direction under a head of water for which the surrounding structure was designed.

#### 4. Submittal Checklist

In general, the following items should be included in the submission:

- a. Letter of intent identifying what is included in the submittal and requested actions to be taken by MSC.
- b. Copy of the Application for Inspection of U.S. Vessel (CG-3752) submitted to the cognizant OCMI, if not already provided, indicating:
  - (1) Hull material
  - (2) Desired passenger count
  - (3) Desired route & inspection subchapter
- c. Inboard and Outboard Profile
- d. Arrangement of Decks

All plans must include sufficient detail to allow for independent verification of compliance with the applicable requirements of 46 CFR Subchapter T.

# 5. General Review Guidance

Ensure the vessel complies with the requirements of Subchapter T, including the applicable items:

#### 5.1 General and Structural Fire Protection (46 CFR 177.405-410):

- a. Machinery and fuel tank spaces must be separated from accommodation spaces so as to prevent the passage of vapors.
- b. Paint and flammable liquid lockers must be constructed of steel or equivalent material, or wholly lined with steel or equivalent material.
- c. Surfaces within 3 feet of a cooking appliances must have a flame spread rating of not more than 75.
- d. The resin for composite vessels must be fire retardant, or general-purpose resin may be used if additional requirements of 46 CFR 177.410(c) are met.

#### 5.2 Escape Requirements (46 CFR 177.500 and refs (k) & (l)):

a. Each space accessible to passengers or used by crew on a regular basis must have at least two widely separated means of escape, at least one of which is not a watertight door, except as otherwise provided in 46 CFR 177.500.

- b. The two required means of escape for each space must be widely separated and, if possible, at opposite ends or sides of the space to minimize the possibility of one incident blocking both escapes.
- c. For both new and existing vessels with overnight accommodations, please see the additional means of escape requirements in references (k) and the guidance of reference (l).
- d. The two means of escape are to be continuous and unobstructed from any point in the vessel to an embarkation station. Doors, hatches, or scuttles that are a means of escape are not be located directly above, or dependent on, a berth.
- e. A ladder leading to a deck scuttle may not be counted as one of the required means of escape except:
  - (1) As not more than one means of escape from any crew accommodation space or work space, or
  - (2) As not more than one means of escape from a passenger accommodation space on vessels of not more than 19.8 m (65 ft) in length and complies with 46 CFR 177.500(n), if applicable.
- f. When a deck scuttle serves as a means of escape, it must not be less than 455 mm (18 inches) in diameter and must be fitted with a quick acting release and a holdback device to hold the scuttle in an open position.
- g. Only one means of escape is required from a space where:
  - (1) The space has a deck area less than 30 m<sup>2</sup> (322 ft<sup>2</sup>);
  - (2) There is no stove, heater, or other source of fire in the space;
  - (3) The means of escape is located as far as possible from a machinery space or fuel tank; and
  - (4) If an accommodation space, the single means of escape does not include a deck scuttle or ladder.
- h. The minimum clear opening of a door or passageway used as a means of escape must not be less than 810 mm (32 inches) in width.
- i. Doors or passageways for crewmembers must have a clear opening not less than 710 mm (28 inches) in width.
- j. Dead end passageways must be no more than 6.1 meters (20 feet) in length.

- k. The sum of the width of all doors and passageways used as means of escape from a space must not be less than 8.4 mm (0.333 inches) multiplied by number of passengers for which the space is designed.
- l. Slides: Water slides pose unique operational hazards to passengers and should be approved only by the OCMI, not MSC. Special attention should be given to any hazards (railings, supports, etc.) in the vicinity of the slide that may impact a rider's extremities during the decent. See reference (d) for more information.

**Note:** Additional requirements for fire safety, not directly applicable to review of general arrangements, may be found in references (f) through (k).

#### 5.3 Stairs

- a. Subchapter T does not have prescriptive requirements for the dimensions of stairways. In accordance with 46 CFR 177.500(d), "the number and dimensions of the means of escape from each space must be sufficient for rapid evacuation in an emergency for the number of persons served."
- b. Subchapter K has prescriptive stairway requirements in 46 CFR 116.438. These may be utilized as a reference point, with the understanding that deviations from the Subchapter K requirements on a Subchapter T vessel may be permissible.
  - (1) In accordance with 46 CFR 116.438(j), the maximum stairway inclination angle from the horizontal for Subchapter K vessels is 40 degrees for passenger stairs, and 50 degrees for crew stairs, and the MSC may approve higher angles of inclination for spaces with severe space constraints.
- c. Stairways must be the same width as that of passageways in accordance with 46 CFR 177.500(f), 32 inches in general or 28 inches for passageways used solely by crew members.

#### **5.4 Crew Spaces (46 CFR 177.700-710)**

- d. Decks above crew accommodation spaces must be above the deepest load waterline.
- e. Overnight accommodations must be provided for all crew if the vessel is operated more than 12 hours in a 24-hour period with the same crew.

#### 5.5 Passenger Accommodations (46 CFR 177.800-820)

- a. Ceilings in passenger accommodation spaces must be at least 1,880 mm (74 inches).
- b. Decks above passenger accommodation spaces must be above the deepest load waterline.

- c. Passenger accommodations must not contain electrical generators, high temperature parts, pipelines, rotating assemblies, controls for operating the vessel, or any item that could injure a passenger, unless such an item is adequately shielded or isolated.
- d. Berths must be provided for each overnight passenger and must meet the requirements of 46 CFR 177.810.
- e. Each passenger overnight accommodation berth must be immediately adjacent to an aisle leading to a means of escape.
- f. An aisle alongside a berth must be at least 610 mm (24 inches) wide; an aisle joining two or more aisles in an overnight accommodation space must be at least 1,060 mm (42 inches) wide.
- g. A seat must be provided for each passenger where fixed seating criterion in 46 CFR 176.113(b)(3) is used.
- h. Seats must be arranged as follows:
  - (1) Aisles not more than 4.57 meters (15 feet) in length must be not less than 610 mm (24 inches) in width.
  - (2) Aisles more than 4.57 meters (15 feet) in length must be not less than 760 mm (30 inches) in width.
  - (3) Where seats are in rows, the distance from seat front to seat front must be not less than 760 mm (30 inches).

#### 5.6 Rails and Guards (46 CFR 177.900-970)

- a. Rails must be installed around decks accessible to passengers or crew.
- b. Height requirements:
  - (1) Ferries, excursion vessels, or vessels subject to the International Convention of Load Lines (ICLL): at least 1000mm (39.5 inches),
  - (2) Others: at least 910 mm (36 inches), except
  - (3) On big game angling vessels, the rail may be reduced to not less than 760 mm (30 inches) in way of a person using specialized angling techniques and equipment.
- c. Rails must be permanently installed with exceptions listed in 46 CFR 177.900(h).

- d. Deck rails must be designed and constructed to withstand a point load of 91 kg (200 pounds) applied at any point in any direction and a uniform load of 74 kg/m (50 pounds/ft) applied to the top rail in any direction; the point and uniform loads need not be applied simultaneously.
- e. Rail courses must be installed so no open space exceeds 305 mm (12 inches) high.
  - (1) On passenger decks of a ferry or a vessel on an excursion trip, chain link fencing, wire mesh, bars, slats, or rail courses must be installed with no greater than a 4 inch high opening.
  - (2) On a vessel subject to ICLL, rail courses must be installed so that there is not an open space higher than 230 mm (9 inches) from the deck to the first rail course.
- f. Temporary rails or equivalent must be installed in way of vehicle ramps. Suitable chains, cables, or other barriers must be installed at ends of vehicle runways.

# 5.7 Passengers Permitted (46 CFR 176.113)

- a. The maximum number of passengers must be not more than the greatest number permitted by length of rail criterion, deck area criterion, fixed seating criterion, or a combination of deck area and fixed seating criterion; see exceptions in 46 CFR 176.113(d).
- b. The measurement criteria in 46 CFR 176.113 is applied for each deck aboard the vessel, and the sum of all decks results in the maximum passenger capacity for the vessel. These regulations do not require each deck to have a maximum passenger capacity. Passenger capacity on upper decks should only be limited by stability.

# 5.8 Window Construction and Visibility (46 CFR 177.1010-1030)

- a. Glass and other glazing material used in windows must not break into dangerous fragments if fractured.
- b. Windows and portholes must be capable of withstanding expected maximum loads from wave and wind conditions expected due to its location on the vessel and the authorized route of the vessel.
- c. Windows and other openings at the operating station must be of sufficient size and in the proper location.
- d. Glass or other glazing material used in windows at the operating station must meet light transmission and other testing requirements of ANSI Z 26.1.

#### **5.9 Drainage of Weather Decks (46 CFR 178.410-450)**

- a. Flush deck vessels:
  - (1) Must have a watertight weather deck,
  - (2) Must have no obstructions to overboard drainage, and
  - (3) May have solid bulwarks in the forward  $1/3^{rd}$  of the vessel if they do not form a well enclosed on all sides, and there is sufficient sheer to ensure drainage aft.
- b. Cockpit, well deck, and open vessels must meet drainage requirements of 178.420-450.
- c. The deck of a cockpit or well deck vessel that operates on partially protected waters or exposed waters must be at least 10 inches above the deepest load waterline; otherwise it will need to comply with damage stability and Type II subdivision standards in Subchapter S.

# 5.10 Collision Bulkhead (46 CFR 179.210, 310, 46 CFR 171.085)

- a. Each vessel more than 65 ft in length must have a collision bulkhead.
- b. A vessel of not more than 65 ft in length must have a collision bulkhead if:
  - (1) Carries more than 49 passengers;
  - (2) Operates on exposed waters;
  - (3) Is more than 40 ft in length and operates on partially protected waters and/or exposed waters; or
  - (4) Is constructed of wood on or after March 11, 2001, and operates in cold water.
- c. A double-ended ferry required to have a collision bulkhead must have a collision bulkhead at each end of the vessel.
- d. The collision bulkhead must be located at least 5% of the length between perpendiculars (LBP) aft of the forward perpendicular.
- e. The collision bulkhead must located be no more than 15% of the LBP aft of the forward perpendicular.
- f. If the vessel is required to meet damage stability criteria, then the collision bulkhead may be located at any point farther aft than 5% of the LBP from the forward perpendicular, provided it meets subdivision and damage stability requirements.
- g. The collision bulkhead must not have any watertight doors in it.

# 5.11 Watertight Bulkheads for Subdivision (46 CFR 179.212-220, 320)

- a. All vessels greater than 65 ft in length must comply with subdivision requirements of Subchapter S.
- b. A vessel not more than 65 ft in length must comply with subdivision requirements of 179.220 or Subchapter S if:
  - (1) It carries more than 49 passengers, or
  - (2) Is constructed of wood after March 11, 2001, and operates in cold water.

# **5.12** Watertight Doors (46 CFR 179.330)

- a. Watertight doors in bulkheads are not permitted unless the vessel will not proceed more than 20 nautical miles from shore and;
  - (1) The door separates a machinery space from an accommodation space and the OCMI determines the door will be closed except when a person is passing through the door; or
  - (2) The Commandant determines that due to the arrangement the door will be closed except when a person is passing through the door. Submitters should request approval from CVC-1 through the OCMI.
- b. See 170.255 for exceptions for Class 1 watertight doors in offshore oil industry vessels.
- c. Watertight door locations shall be in accordance with 46 CFR 179.330.

# **5.13** Watertight integrity (46 CFR 179.360)

- a. Hatches exposed to weather must be watertight, except the following hatches may be weathertight;
  - (1) Hatch on a watertight trunk at least 12 inches above the weather deck.
  - (2) A hatch in a cabin top.
  - (3) A hatch on a vessel that operates only on protected waters.
- b. A weathertight door must be provided for each deck house or companionway opening. Permanent watertight coamings must be provided follows:

- (1) On exposed or partially protected route, there must be at least a 6 inch height coaming.
- (2) On a protected route there must be at least a 3 inch height coaming.

# **6. Potable Water Tanks**

Ensure that potable water tanks on the vessel comply with the requirements of 21 CFR Subchapter L, §1250.82, including the following applicable items:

- a. Potable water tanks must be independent of any tanks holding non-potable water or other liquids.
- b. Potable water tanks must be independent of the shell of the ship unless:
  - i. The bottom of the tank is at least 2 feet above the maximum load waterline,
  - ii. The seams in the shell are continuously welded, and
  - iii. There are no rivets in that part of the shell which forms a side of the tank.
- c. Toilets or urinals are not permitted directly above a deck which forms the tanktop of a potable water tank.

#### 7. Special Consideration

In accordance with 46 CFR 175.550, the cognizant OCMI may give special consideration to authorizing departures from the specific requirements of 46 CFR Subchapter T when unusual circumstances or arrangements warrant such departures and an equivalent level of safety is provided, except as stated in reference (l). The OCMI of each marine inspection zone in which the vessel intends to operate must approve any special consideration granted to the vessel.

# 8. 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 MSC, the unit responsible for implementing this guidance.