



REVIEW OF LOCKS AND LATCHES IN DOORS IN ESCAPE PATHS

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J. B. BYBEE, CDR, Chief, Hull Division

Purpose

The purpose of this Plan Review Guideline (PRG) is to provide clear guidance on when escape doors from public spaces should be fitted with a means of quick release.

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 SOLAS-49.

E-mail: msc@uscg.mil

Phone: 202-795-6730

Website: www.dco.uscg.mil/msc

1. Applicability

This PRG is applicable to SOLAS passenger ships carrying more than 36 passengers.

2. Reference

SOLAS II-2/13.3.2.6.2

“Escape doors from public spaces that are normally latched shall be fitted with a means of quick release. Such means shall consist of a door-latching mechanism incorporating a device that releases the latch upon the application of a force in the direction of escape flow. Quick release mechanisms shall be designed and installed to the satisfaction of the Administration and, in particular:

- .1 consist of bars or panels, the actuating portion of which extends across at least one half of the width of the door leaf, at least 760 mm and not more than 1120 mm above the deck;
- .2 cause the latch to release when a force not exceeding 67 N is applied; and
- .3 not be equipped with any locking device, set screw or other arrangement that prevents the release of the latch when pressure is applied to the releasing device.”

3. Background

Doors used to divide a public space into smaller areas or control access to or from dining rooms, activity rooms or other public spaces must be provided with escape hardware as described in SOLAS II-2/13.3.2.6. The concern is that a required escape door that can be locked when an area like a restaurant is not “Open,” may inadvertently be left locked when the space is occupied resulting in loss of egress capability. Preventing passengers from entering a “Closed” area or space does not reduce or alter the requirements of II-2/13.3.2.6.

4. Content

Relative to the background section above, any public space that is greater than 50m² or has an occupancy of more than 50 persons requires escape doors fitted with means for quick release, whether or not these doors are normally kept open.

The use of thumb-turn latches, locks and other devices which do not open when a force is applied in the direction of escape are not appropriate in doors within or leading from public spaces (as defined in SOLAS II-2/3.39). Additional doors, including cosmetic or ornamental doors, gates, or other barriers in interior partitions (whether full height or not) located within public spaces, through which passengers are expected to escape that have a door-latching mechanism must incorporate a device that releases the latch upon the application of a force in the direction of escape flow.

All doors in the escape path from any area within a public space must meet the requirements of II-2/13.3.2.6.2.

5. 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.