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16714 13 August 1997

From: Commander, Eighth Coast Guard District

To: Distribution

Subj: TESTING OF LIFERAFT HYDROSTATIC RELEASE

1. Enclosure (1) is forwarded for your information.

G. (A). TETREAU By direction

Encl: (1) COMDT(G-MOC-2) ltr 16714/160.162/GENERAL, MOC Policy

Ltr No. 9-97 of 24 July 1997

Dist: All Eighth District MSOs, MSU, and MSDs



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From: Commandant Distribution To:

TESTING OF LIFERAFT HYDROSTATIC RELEASE UNI Subi:

Ref:

(a) 46 CFR 160.062(f)(2)

(b) 46 CFR 199.190(h)

(c) COMDTINST M16714.3E (Equipment Lists)

- 1. A recently published final rule on inflatable liferafts (62 FR 25525, May 9, 1997) eliminated the necessity for a marine inspector to attend every liferaft servicing. However, references (a) and (b) require each hydrostatic release unit (other than the "disposable" type) to be periodically serviced and tested in the presence of a marine inspector. This obviously conflicts with the intent of the final rule; i.e., to streamline the liferaft inspection process and provide for more effective use of Coast Guard inspection resources. To relieve this conflict, the following policy is effective immediately for hydrostatic release units which undergo required periodic testing at approved liferaft servicing facilities.
- 2. Marine inspectors need only witness the testing, and stamp the inspection tag, of hydrostatic release units which are tested concurrently with a liferaft servicing attended by an inspector. The practical effect of this policy is that testing of hydrostatic release units will be witnessed on the same "spot check" basis as liferaft servicing under the new liferaft rules. For testing of those hydrostatic release units not witnessed by a marine inspector, the OCMI should advise the facility performing the test to stamp its 3-digit facility identification code in lieu of the MIO identification letters and "USCG" required by reference (a). Facility codes may be found on all recent liferaft servicing facility approval letters, and in reference (c).
- 3. This policy letter will be canceled upon completion of a future rulemaking project to update 46 CFR 160.062.

By direction

Dist: All G-M Division Offices

> All District (m) Offices Marine Safety Center Marine Safety School

USCG/ABS Liaison Officer USCG/MSC Liaison Officer