From: Commander, Eighth Coast Guard District
To: Distribution

Subj: TESTING OF LIFERAFT HYDROSTATIC RELEASE

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

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
From: Commandant  
To: Distribution  
Subject: TESTING OF LIFERAFT HYDROSTATIC RELEASE UNITS

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 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.

J. E. SCHRINNER  
By direction

Distinct: All G-M Division Offices  
          All District (m) Offices  
          Marine Safety Center  
          Marine Safety School  
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          USCG/MSC Liaison Officer