

MODU Option “A”

33 CFR 143.207 states: “Each Mobile Offshore Drilling Unit that is documented under the laws of a foreign nation **must**, when engaged in OCS activities, comply with **one of 3** options: 143.207(a), 143.207(b) or 143.207(c).”

This training aid focuses on 33 CFR 143.207(a) – *otherwise known as Option “A”*.

If an owner/operator chooses to comply with Option “A” then **33 CFR 143.207(a) states** they must comply with:

“The **design and equipment standards** of 46 CFR Part 108.”

33 CFR 146.205 states: Each mobile offshore drilling unit that is documented under the laws of a foreign nation must, when engaged in OCS activities, comply with **one of 3** options: 146.205(a), 146.205(b) or 146.205(c).”

This training aid focuses on 33 CFR 146.205(a) – *otherwise known as Option “A”*.

If an owner/operator chooses to comply with Option “A” then **33 CFR 146.205(a) states** they must comply with:

“The **operating standards** of 46 CFR Part 109.”

It is critically important to remember that:

1. There is **NO path** to 46 CFR 107 – Inspection and Certification
2. There is **NO path** to 46 CFR, Subchapter F – Marine Engineering
3. There is **NO path** to 46 CFR Subchapter J – Electrical Engineering
4. Option “A” MODUs are issued a **Certificate of Compliance (COC)** and **not** a Certificate of Inspection (COI) because they are foreign-flagged.

The table below shows the various 33 & 46 CFR cites that are applicable to Option “A” MODUs.

Note: It is important to use the correct version of Subchapter I-A depending on the MODU’s build date.

CFR	APPLICABLE	NOT APPLICABLE
33 CFR 140, Subparts A, B & C	X	
33 CFR 141	X	
33 CFR 142, Subparts A, B & C	X	
33 CFR 143, Subparts A & C	X	
33 CFR 143, Subparts B, D & E		X
33 CFR 144.01, 144.10 & 144.20		X
33 CFR 144.30	X	
33 CFR 145		X
33 CFR 146, Subparts A & B		X
33 CFR 146, Subparts C, D & E	X	
33 CFR 147		X
46 CFR 107		X
46 CFR 108	X	
46 CFR 109	X	
33 CFR, Subchapter O	X	
46 CFR, Subchapter F		X
46 CFR, Subchapter J		X

The table below shows the additional requirements outlined in the MSM for MODUs. Some of these requirements are incorrect because there is **NO regulatory path** to apply them:

MSM VOLUME II	Regulatory Path	NO Regulatory Path
G.3.G.1 Workplace Safety	33 CFR 142	
G.3.G.2 Dry Dock Examination/Special Exam in Lieu of Dry Docking		X
G.3.G.3 Cranes	46 CFR 108.601 46 CFR 109, Subpart F	
G.3.G.4 Pressure Vessel Internal Exams		X
G.3.G.5 Lifesaving Appliances	46 CFR 108, Subpart E	
G.3.G.6 Carriage of Exposure Suits	33 CFR 144.30-5	
G.3.G.7 Fire Safety	46 CFR 108, Subpart D	
G.3.G.8 Alarms, Remote Controls & Others Safety Devices		X
G.3.G.9 Emergency Lighting Systems		X
G.3.G.10 Helicopter Facilities	46 CFR 108.231 - .241 46 CFR 109.577	
G.3.G.11 Navigation Lighting	33 CFR 67	