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From: Commander, Eighth Coast Guard District
To: Distribution

Subj: POLICY ON MANNING OF NON-SELF PROPELLED FLOATING OUTER
CONTINENTAL SHELF (OCS) FACILITIES

Ref: (a) Regional Exam Center New Orleans Policy Letter #06-91
(b) 33 CFR 140.10
(c) 33 CFR 143.120(b)
(d) 33 CFR 143.120(c)

1. PURPOSE. This letter provides policy on manning of non-self propelled floating OCS facilities within the Eighth District's area of operations. This policy letter, which is based upon reference (a) and Commandant (G-MVP) policy, is effective upon receipt. It is written to ensure consistency in manning of current and future floating OCS facilities located throughout the Eighth Coast Guard District. This policy does not apply to ship-shaped floating production systems (FPSs) or floating production, storage, and offloading systems (FPSOs).

2. DISCUSSION.

a. Reference (b) provides the definition of a floating OCS facility. Floating OCS facilities include but are not limited to tension leg platforms (TLPs), spars, and non-self propelled FPSs. The regulations in 33 CFR, Subchapter N specifically exclude mobile offshore drilling units (MODUs) from the definition of floating OCS facility. Reference (c) requires each floating OCS facility to meet 46 CFR Subchapters F and J (engineering and electrical regulations) and 46 CFR Part 108 of Subchapter IA. Reference (d) authorizes the cognizant Officer in Charge, Marine Inspection (OCMI) to issue a Certificate of Inspection (COI) after determining that the floating OCS facility meets all applicable requirements. For each COI issued, the OCMI designates an appropriate manning level to ensure the floating OCS facility can be operated safely during both routine and emergency conditions.

b. Various Commandant (G-MVI) policy letters dating back to 1989/90 established the precedent for manning on the Conoco JOLLIET tension leg well platform (TLWP) and the Shell E & P Company's TLP AUGER. These manning requirements were based on the manning required for a conventional non-self propelled semi-submersible MODU on location. Commandant essentially adopted the manning now described in the Marine Safety Manual, Volume III, Chapter 19 for a "**Non-Self Propelled MODU (Excluding Bottom Bearing Units)**

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2. b. (cont.) **On Location or Under Tow**” as the basis for required manning on the first TLWPs and TLPs. This same manning structure, with minor variations, has been the norm for all similar TLPs currently operating in the Gulf of Mexico.

c. Reference (a) formalized the requirements for licensing of personnel to serve as Offshore Installation Manager (OIM), Barge Supervisor (BS), and Ballast Control Operator (BCO) on TLPs and TLWPs. Reference (a) is currently under revision and will be reissued in the near future as a separate Eighth District policy letter. The revised policy will address licensing requirements for personnel serving aboard floating OCS facilities operating within the Eighth Coast Guard District.

d. The Memorandum of Understanding between the Coast Guard and the Minerals Management Service signed on December 16, 1998 identifies the U.S. Coast Guard as the lead agency for firefighting on floating OCS facilities. Accordingly, this policy provides facility operators the option of substituting “firefighting specialists” with Coast Guard approved firefighting and first aid training for up to two of the required Able Seamen. Owners and operators may also substitute a trained “firefighting specialist” for the one Ordinary Seaman typically required on floating OCS facilities. These “firefighting specialists” must be separate from the personnel serving in the licensed positions mandated on the floating OCS facility’s certificate of inspection. The required firefighting and first aid training is that specified by 46 CFR 10.205(g) and 46 CFR 10.205(h)(1) respectively. The “firefighting specialists” need not be Coast Guard licensed or documented but must possess satisfactory evidence of having completed the firefighting and first aid training specified by 46 CFR 10.205(g) and 46 CFR 10.205(h)(1).

e. Until recently, the Coast Guard addressed manning issues only for TLWPs and TLPs. Coast Guard policy on manning of spar buoys and other types of “non-conventional” FPSs has not been formally adopted. Many of these specialized FPSs have significantly different stability and seakeeping characteristics than traditional TLPs and column stabilized semi-submersible floating OCS facilities and should be considered separately.

(1) Floating OCS Facilities with Passive Ballast Systems: Some floating OCS facilities have been shown to possess superior stability and seakeeping characteristics. In addition, these units have been shown to be relatively insensitive to changes in variable deck load. As such, these floating OCS facilities have a reduced need for active monitoring and management of the unit’s ballast control system. Such units are considered to have “passive ballast systems.” Based on the simplicity of passive ballast systems, including a reduced need to actively monitor or regularly adjust ballast or tendon/mooring system tension, a reduced manning complement for these floating OCS facilities is appropriate. Chevron’s GENESIS spar buoy is an example of a floating OCS facility with a passive ballast system. Theoretically, other types of floating OCS facilities (TLPs, Sea Stars) could be designed with passive ballast systems.

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2. e. (2) Floating OCS Facilities with Active Ballast Systems: Conversely, other floating OCS facilities are designed with “active ballast systems.” Characteristics of active ballast systems include a requirement to actively monitor and make routine adjustments to ballast and/or tensioning/mooring systems in response to changes in hull orientation/stability caused by deck load movements, changing environmental loads or other factors. Current examples of active ballast systems include traditional TLP designs (Shell’s AUGER, MARS, RAM POWELL and URSA and BP/Amoco’s MARLIN) and column stabilized semi-submersible floating OCS facilities.

3. POLICY. The following baseline manning scales are established for floating OCS facilities:

a. **FLOATING OCS FACILITIES WITH ACTIVE BALLAST SYSTEMS**

1 CG Licensed Offshore Installation Manager (OIM)
1 CG Licensed Barge Supervisor (BS)
2 CG Licensed Ballast Control Operators (BCOs)¹
2 Able Seamen²
1 Ordinary Seaman²
Certificated Lifeboatmen as determined by the OCMI³

b. **FLOATING OCS FACILITIES WITH PASSIVE BALLAST SYSTEMS**

1 CG Licensed Offshore Installation Manager
1 CG Licensed Barge Supervisor (BS)
2 Able Seamen²
1 Ordinary Seaman²
Certificated Lifeboatmen as determined by the OCMI³

¹ One of the two BCOs may be eliminated following completion of drilling operations provided the OCMI is satisfied that the safety of the unit will not be compromised by maintaining a periodically unattended ballast control room (BCR).

² A trained “firefighting specialist” holding course completion certificates from approved firefighting and first aid courses meeting the requirements of 46 CFR 10.205(g) and 46 CFR 10.205(h)(1) respectively may be substituted for the required Able or Ordinary Seamen. The “firefighting specialist” need not hold either a Coast Guard license or MMD. A licensed officer serving in a position required on the floating OCS facility’s COI may not be “double counted” as a firefighting specialist. Licensed officers in excess of those required on the unit’s COI may be counted as a “firefighting specialist.”

³ An individual serving in any position mandated on the facility’s COI may be “double counted” as one of the required lifeboatmen provided that individual also possesses a valid Merchant Mariners Document endorsed as “lifeboatman.”

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3. c. The sample manning scales above represent baselines for the OCMI to use in evaluating required manning for each floating OCS facility. The actual manning required by the OCMI could be more or less depending upon the specifics of the particular floating OCS facility.

d. When establishing manning requirements for floating OCS facilities, Eighth District OCMI's shall, among other factors, consider the unit's stability characteristics, mooring arrangement and the frequency of required ballasting operations (and/or tendon/mooring system tensioning), including the degree of ballast system automation. Other factors to consider in establishing appropriate manning include whether produced oil is stored aboard the facility, including the mooring and unmooring requirements of any associated lightering operations. Consideration of future industry proposals to install unmanned floating OCS facilities is beyond the scope of this policy letter and will be considered on a case by case basis. Owner/operator appeals of the OCMI's decisions on these issues will be handled via the normal appeal process.

e. Each lifeboatman required under this policy must possess a Coast Guard Merchant Mariners Document (MMD) that automatically includes the lifeboatman endorsement (e.g. Able Seaman) or that is specifically endorsed as "lifeboatman" (e.g. Ordinary Seaman with lifeboatman endorsement). This requirement applies equally to Coast Guard licensed and unlicensed personnel. Coast Guard licensed personnel must obtain a separate MMD that includes the lifeboatman qualification to be counted as one of the lifeboatman required by the facility's Certificate of Inspection

f. During discussions with industry over an early draft of this letter, several offshore operators were concerned about the difficulty in complying with the provisions of this policy when establishing the manning for their **initial** floating OCS facilities. They indicated a desire to have their best-qualified personnel (normally from fixed platforms operated by the company) attend training and ultimately qualify to obtain the required licenses for OIM, BS and BCO. After attending all the Coast Guard required training, typically, the only item preventing these individuals from obtaining their Coast Guard licenses is actual service time aboard a floating OCS facility. For this reason, the upcoming revision to reference (a) will include a provision allowing OCMI's in coordination with Eighth District Regional Examination Centers to accept time spent in oversight of the construction, outfitting and installation of a floating OCS facility for purposes of issuing a license for OIM, BS or BCO restricted to that specific floating OCS facility. The applicant would be required to meet all other license requirements. After obtaining the required service aboard the floating OCS facility, the holder of a restricted license could apply to have the license restriction removed. This procedure will be discussed in greater detail in the upcoming revision to reference (a).

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4. ACTION. Eighth District OCMI's shall use the guidance contained in this letter to establish manning requirements for floating OCS facilities installed within their areas of responsibility. OCMI's shall evaluate the COI's of all existing floating OCS facilities operating in their respective AOR's and ensure that a manning scale consistent with the provisions of this policy letter has been established. OCMI's shall immediately notify any existing floating OCS facility operating with a manning level inconsistent with this policy. In such cases, Eighth District OCMI's are expected to establish reasonable compliance schedules to ensure that the intent of this policy is implemented.

5. A copy of this policy letter is being provided to Commandant (G-MSO) and the National Maritime Center with a recommendation that it be considered in adopting a consistent Coast Guard wide approach in the area of manning of floating OCS facilities. Please contact Lieutenant Commander Bill Daughdrill of my staff at (504) 589-6193 should you have any questions regarding this matter.



C. T. DESMOND
By direction

Dist: All Eighth District Gulf Region MSOs, MSU and MSDs

Copy: Commandant (G-MSO), (G-MOC)
National Maritime Center