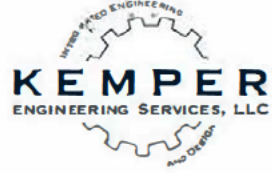


Testimony of  
[REDACTED] P.E., DFE  
***Summary of preliminary findings  
regarding OceanGate and loss the  
Titan Submersible***

Kemper Engineering Services  
Baton Rouge, LA

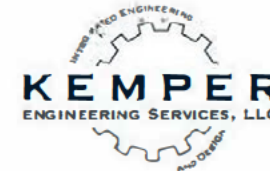


# Task

At the request of the US Coast Guard, provide additional expertise in the investigation of OceanGate with respect to the Titan Submersible and subsequent loss of life in the areas of:

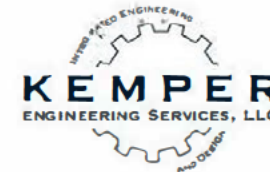
- Engineering design and design management practices
- Organizational impact on engineering design, safety, and reliability
- Relevant codes & standards, with focus on ASME PVHO-1
- Verification, Validation, and Uncertainty Quantification (VVUQ)
- Acrylic windows
- Pressure vessels under external pressure
- Carbon fiber composites
- Computer modeling and simulations
- Failure analysis and root cause analysis





# Timeline

Feb. 2016	KES and OceanGate present at Marine Technology Society (MTS) Manned Underwater Vehicles (MUV)/Underwater Intervention (New Orleans, La.) Also met socially through MTS social events.
Dec. 2017	██████████ requested a pro-bono analysis of a non-standard acrylic window for CYCLOPS II.
Jan. 2018	Transmitted window report to OceanGate via ██████████. Results indicated failure likely after multiple full-depth dives
Mar. 2018	██████████ agrees to sign letter to OceanGate
June 2023	OceanGate's TITAN (formerly CYCLOPS II) lost at sea
Sep. 2023	KES submitted report to NTSB regarding TITAN window
Mar. 2024	KES agrees to volunteer to assist in USCG MBI



# P.E., DFE

## Positions:

Principal Engineer, KES (since company formation Dec. 2006)

Engineering Researcher, University of Louisiana at Lafayette (since Feb. 2024)

Lieutenant Colonel, U.S. Army Corps of Engineers (Retired June 2020)

## Education:

Xaverian High School, Brooklyn NY

Louisiana State University, Baton Rouge LA (BS Mechanical Engineering)

U.S. Army (Army Reserves Engineer officer career through Command and General Staff College)

## Experience:

Engineering since 1992, Self-employed as a consulting engineer since 1997 when not on military duty

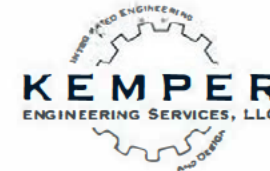
Began working on saturation diving systems, diving support in 1998. Consulted for multiple diving, subsea, and marine companies, incl. complex hyperbaric systems, like the **Acergy DSV EAGLE** (dove Russia's KURSK) as well as submarine (PVHO) window manufacturers (Blanson Acrylic (UK), Hydrospace (USA)), consulted for Woods Hole Oceanographic Institute, OceanX, and US Navy Deep Submergence re. small subs; consulted on **Perry PC 1601**, potential work with Reynolds Marion's **HyperSub**.

Joined ASME **Pressure Vessels for Human Occupancy** (PVHO) Codes & Stds committee in 2008

Chair, Viewports Subcommittee (2016); Chair, Design By Analysis for Glassy Polymers Task Group (2019)

Joined ASME **Verification, Validation, and Uncertainty Quantification** (VVUQ) Codes & Stds in 2022

Subcommittees: Solid Mechanics (VVUQ 10); AI and Machine Learning (VVUQ 70)



# Bart Kemper, P.E., DFE

**Licenses and** Professional Engineer (LA, TX, WA, others); Queensland, Australia

**Recognitions:** Board Certified Forensic Engineer (US through NAFE/CESB; International through IBFES)  
Fellow, American Soc. of Mechanical Engineers (ASME); National Soc. of Professional Engineers (NSPE)  
Editor-in-Chief, *Journal of the National Academy of Forensic Engineers (NAFE)*  
Member: ASME, NSPE, MTS, NAFE, IEEE Oceanic Eng. Soc. (OES), Society of Naval Architects and Marine Engineers (SNAME), Am. Academy of Forensic Science (AAFS), Am. Assoc. for the Adv. of Science (AAAS)

**Select Papers,** [REDACTED] "Review of Life Limitations For Acrylic Windows In  
**Presentations:** Pressure Vessels." ASME Int'l Mechanical Engineering Congress and Expo., Nov. 2023

[REDACTED] "Application of VVUQ Concepts to ASME Codes and Standards for Pressure Vessels," ASME Verification, Validation, and Uncertainty Quantification (VVUQ) Conference, May 2023

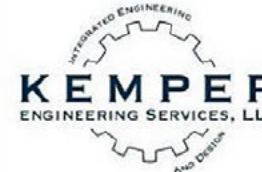
[REDACTED] "Developing 'Design By Analysis' methodology for windows for PVHOs." *ASCE-ASME Journal of Risk and Uncertainty in Engineering Systems* (Vol 6, Issue 3), Sept. 2020

[REDACTED] "Heat Retention and Structural Integrity of Glassy Polymer Windows." UI 2018

[REDACTED] "Jurisdictional Acceptance of Non-ASME Pressure Vessels for Human Occupancy". Joint ASME/USCG Workshop on Marine Technology & Standards, 2013

*Total of 12 peer-reviewed papers, 20 conference papers or presentations on PVHOs, pressure vessels, subsea, or VVUQ*  
*Bart Kemper does not represent ASME, MTS, NSPE, USCG, DHS, nor any organization other than KES. All opinions are his.*





# Kemper Engineering team

**Lead Investigator** [REDACTED] P.E., DFE, Principal Engineer KES, Researcher Univ. of La. Lafayette (PVHO)

**KES Staff** [REDACTED] Company President (PVHO)

Prof. Emeritus A.J. McPhate (LSU), P.E., Senior Consultant

[REDACTED] Staff Engineer

[REDACTED] mechanical engineering student intern (LSU)

[REDACTED] chemical engineering student intern (BRCC)

[REDACTED] IT support

**Consultants** [REDACTED] E., Mechanical/Biomedical Engineer (PVHO)

[REDACTED] Former saturation diver and diving operations manager (PVHO)

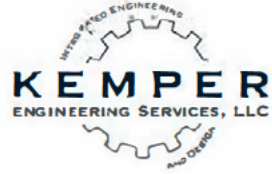
[REDACTED] P.E., PhD, Mechanical/Aerospace Engineer

[REDACTED] P.E., DFE, Mech/Aerospace Engineer, formerly of NASA, incl. COLUMBIA investigation

[REDACTED] P.E., DFE, Electrical Engineer

[REDACTED] Aerospace Engineer/Simulation Expert

***PVHO = Member of ASME PVHO or subcommittees; DFE = Diplomate of Forensic Engineering (US Board Certification)***



# Kemper Engineering team

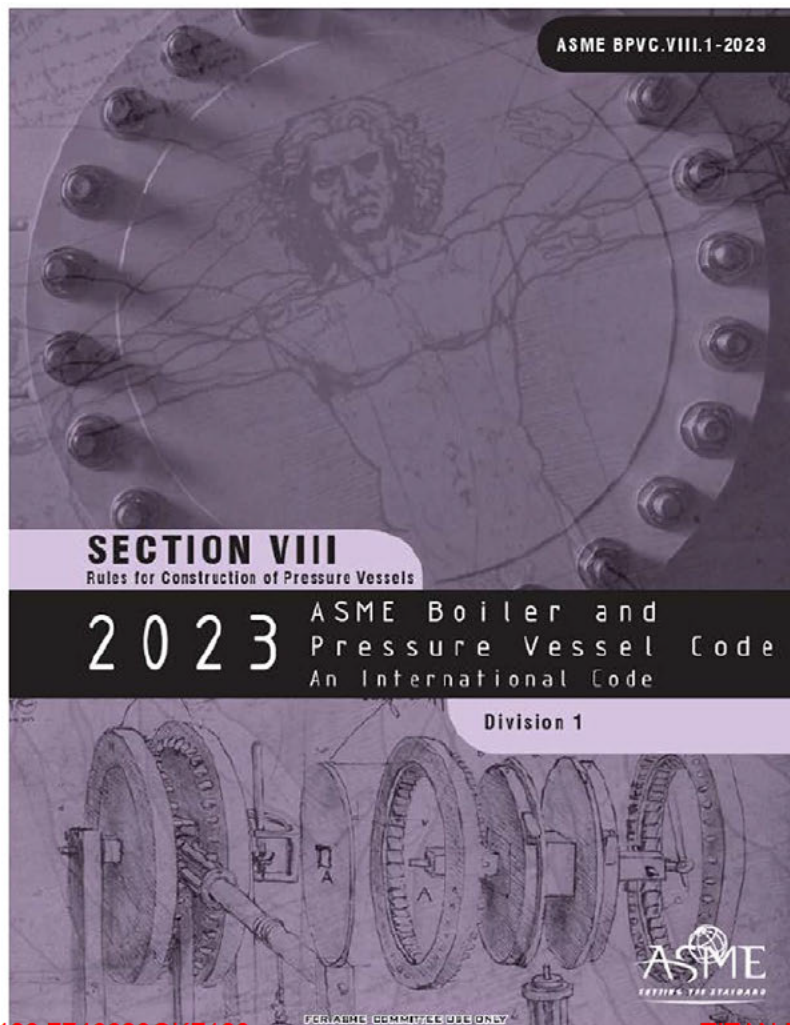
- **Brief by exception** (focus on implosion, consideration of previous briefings)
- Role of engineering codes & standards and the jurisdictional authorities
- Innovation and the need to use VVUQ methods
- Initial results regarding:
  - Window design
  - Pressure hull (carbon fiber composite, titanium heads, glued joint)
  - Testing & Simulations (as part of VVUQ)
  - Operations and safety procedures
- **Observations:** Failure to have an integrated life cycle systems engineering approach; Failure to have a Responsible-In-Charge professional

# Engineering codes & standards (C&S)

- **“Written in blood”** – C&S often in direct response to safety need
- Intended to capture **best practices** as specific calculations, data sets, and procedures so others don’t have to “reinvent the wheel”.
- Developed by **volunteers** with a cross-section of interests, vetted for knowledge
- Vetted by the **American National Standards Institute (ANSI)**
- New technology is adopted based on **data, studies, and practice**
- **Cannot enforce**; is published and jurisdictions decide to use it
- Is a **system of codes**, where other requirements are cited by codes, e.g. ASME pressure vessel code cites piping, bolting and testing codes as well as cites ASCE-7 for wind and other environmental loads, etc. ASME PVHO-1 relies on other codes for detailed structural design other than windows.



# ASME Pressure Vessel Codes



The ASME Boiler and Pressure vessel code is design **system with 13 sections in 34 binders** that includes material properties indexed by alloy and temperature as well as design rules for boilers, nuclear applications, heat exchangers, and pressure vessels. It includes rules for “design by analysis” (Section VIII, Div. 2, Part 5).

There are separate groups of codes for piping (B31) and other related items.

API 579/ASME FFS1 provides for “fitness for service” to determine **reliable useful life** of in-service items.

ASME PVHO-1 is a design and safety code. ASME PVHO-2 is post-construction. It was **originally focused on windows** and has expanded to look at **PVHOs as a system**, with emphasis on life support and safety. It does not address the pressure vessel design in depth but instead defers to other codes (ASME Section VIII, Class societies).

# ASME PVHO-1 specific documents

ASME PVHO-1-2023  
(Revision of ASME PVHO-1-2019)

## Safety Standard for Pressure Vessels for Human Occupancy

AN AMERICAN NATIONAL STANDARD



### User's Design Specification (Section 7: Submarines)

- (a) number of intended occupants
- (b) maximum operating pressure/depth
- (c) required pressurization and depressurization rates, ventilation rates, and conditions under which rates are to be maintained
- (d) intended operational environment

- (e) maximum number of pressure cycles
- (f) maximum/minimum internal/external pressures
- (g) operating temperatures
- (h) storage conditions /temperatures
- (i) number, size, and type of penetrators, doors, hatches, windows, and service locks
- (j) corrosion allowance
- (k) environmental requirements
- (l) special design considerations applicable to normal and emergency service, e.g., requirements for the sizing of the diver lockout hatch [i.e., the diver dress and potential underwater breathing apparatus (UBA) to be used]
- (m) fire suppression

### Manufacturer's Data Report

Form GR-1. Shows the design meets the User's Design Specification. Requires Professional Engineer to review and sign

### Risk Analysis

Retained document to be transmitted with item

### Retained documents

List of items that are inspectable by jurisdiction, also to be retained and transmitted with the PVHO, including window certifications (VP1 through VP4). These documents would be available for review if OceanGate followed the PVHO-1

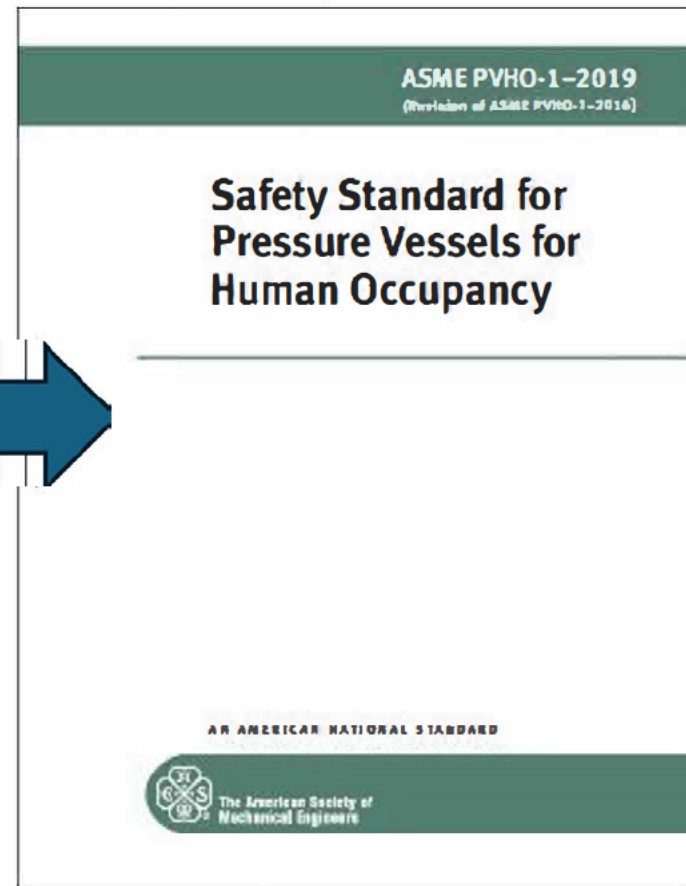
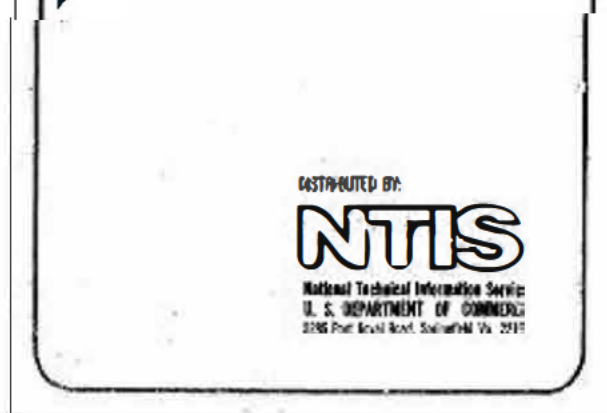
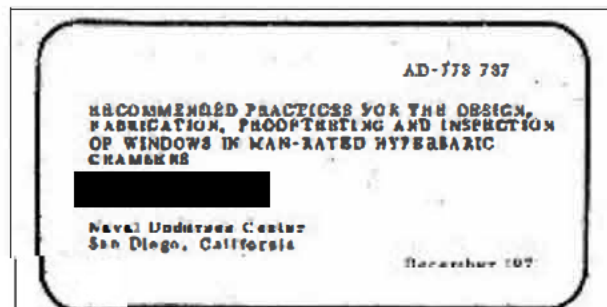
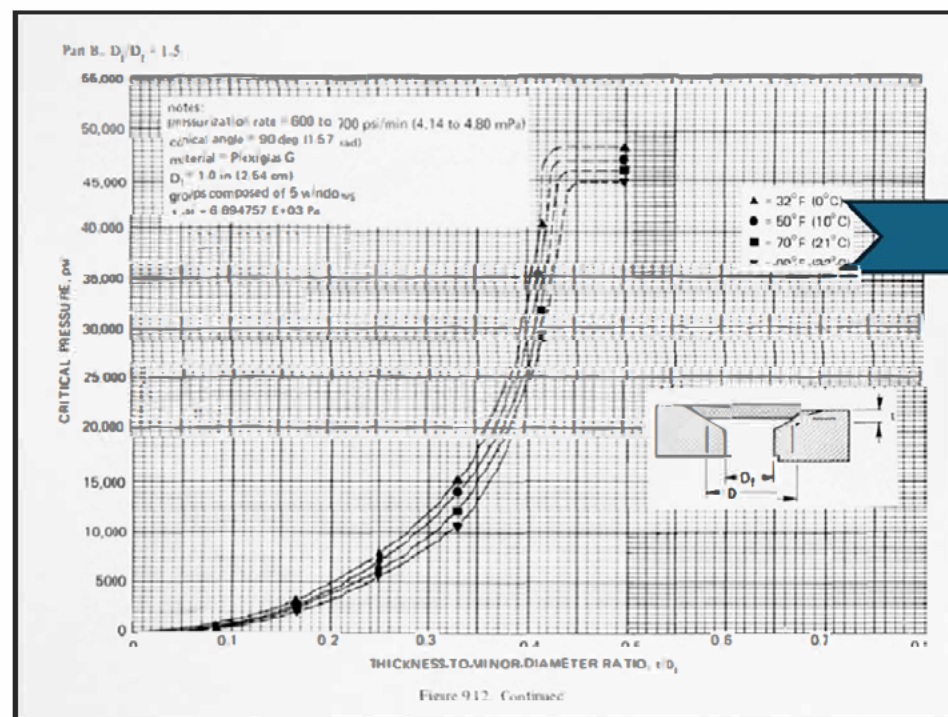


# Acrylics windows?

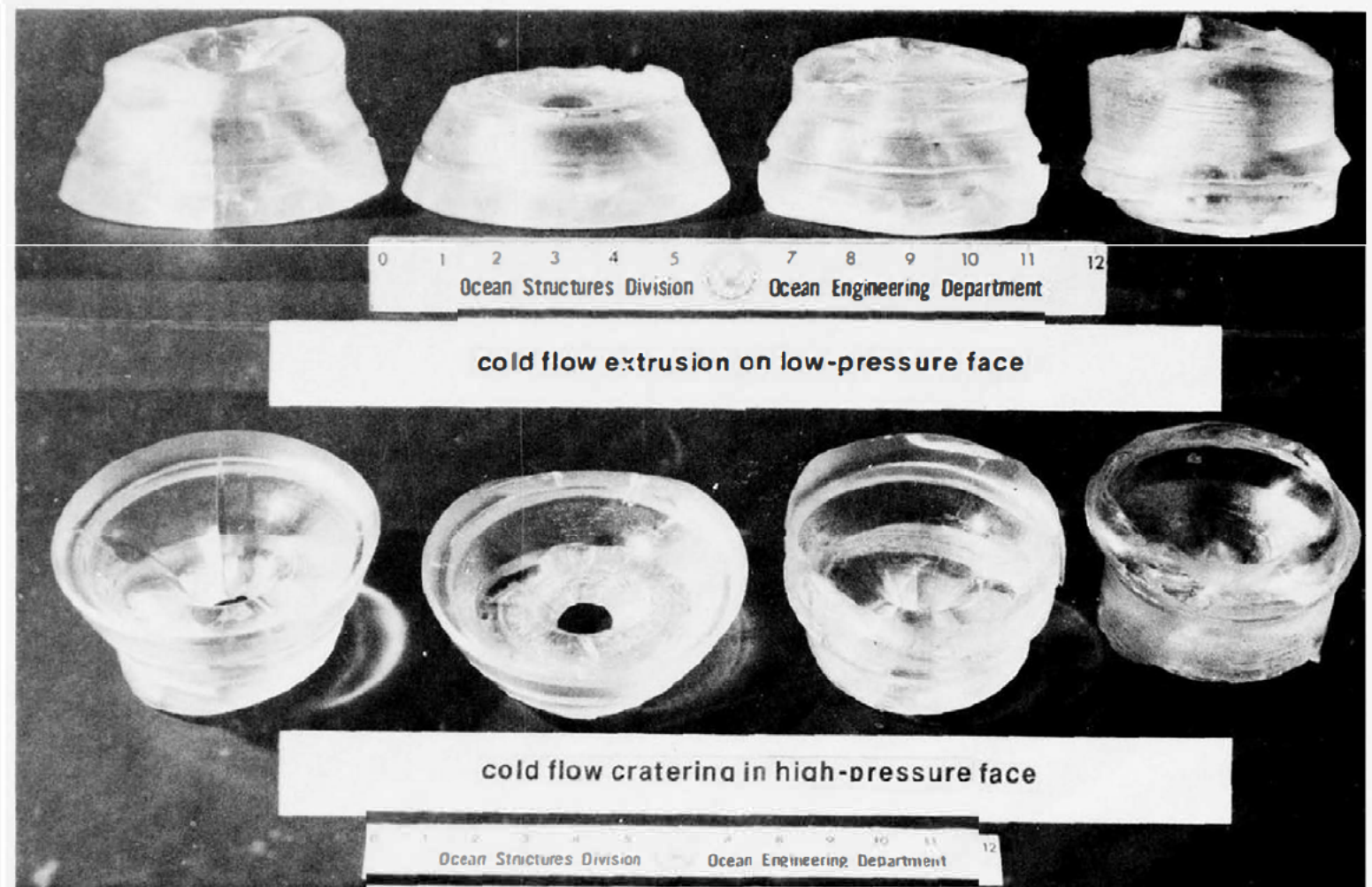
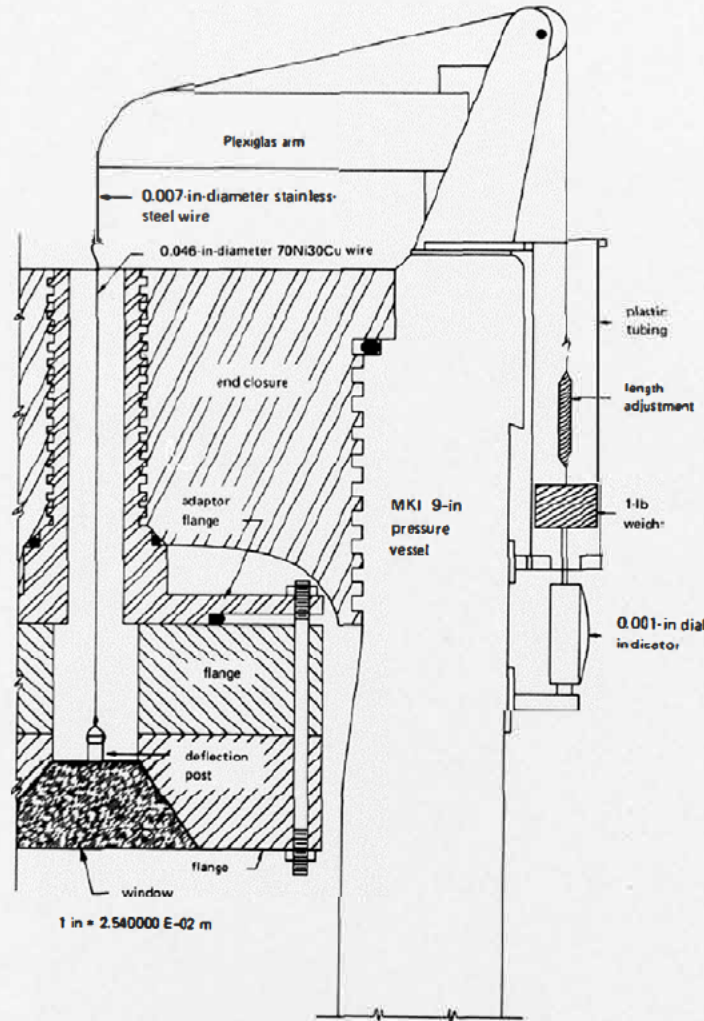
During TRIESTE dives, glass and synthetic sapphire allowed leaks as pressure increased. Ceramic cracks often often unstable, give little reaction time.

Acrylics are a plastic and molds to the conical seat. Cracks tend to be more stable, allows reaction time.

Acrylic is weaker than metals and more temperature sensitive. Dr. Stachiw made conservative assumptions so windows do not fail before other components. **No design failures to date.**



# Acrylics windows?





# Acrylics windows?

Proceedings of the ASME 2021  
Pressure Vessels & Piping Conference  
PVP2021  
July 13-15, 2021, Virtual, Online

PVP2021-62146

## VALIDATION OF MODERN FINITE ANALYSIS METHODS FOR GLASSY POLYMERS USING HISTORICAL STUDIES

Kemper Engineering Services  
Baton Rouge, LA

### ABSTRACT

The current method for designing acrylic pressure vessel components relies upon an empirical method developed through experimentation during the 1960's and 70's. The method is detailed in ASME PVHO-1, Safety Standard for Pressure Vessels for Human Occupancy. One of the factors restricting the design methodology to experimental correlation was the structural dimensions. Thick wall pressure vessel geometry prevented the use of conventional Section VIII pressure vessel calculations, which assumes thin wall pressure vessels. Early Finite Element Analysis (FEA) models of acrylic windows could not be validated through experimentation. This was attributed to the viscoelastic properties of acrylics. The resulting experiment-based PVHO-1 Safety Standard has a proven safety record but is not readily updated. This paper re-examines some of the work used to develop PVHO-1 to demonstrate modern nonlinear FEA and V&V techniques can predict the results of the original work. In doing so, this work also validates the use of FEA going forward for Design By Analysis (DBA) using Verification and Validation (V&V) for new materials, shapes, and applications.

Keywords: acrylic, PVHO, windows, FEA, nonlinear, contact elements, stochastic, V&V

### NOMENCLATURE

Usage is per ASME PVHO-1

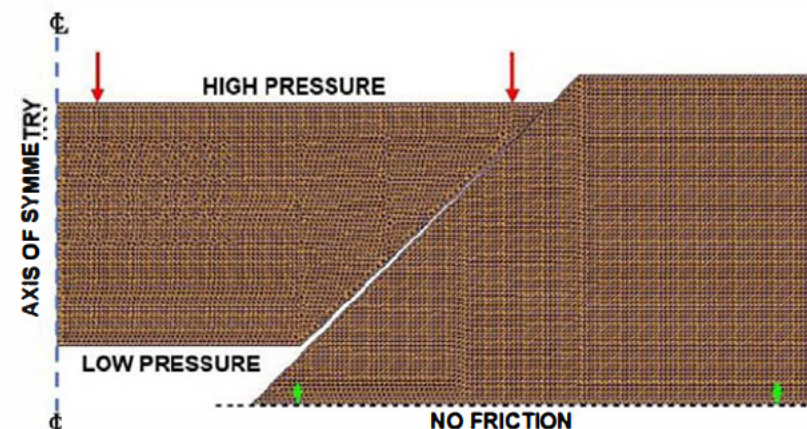
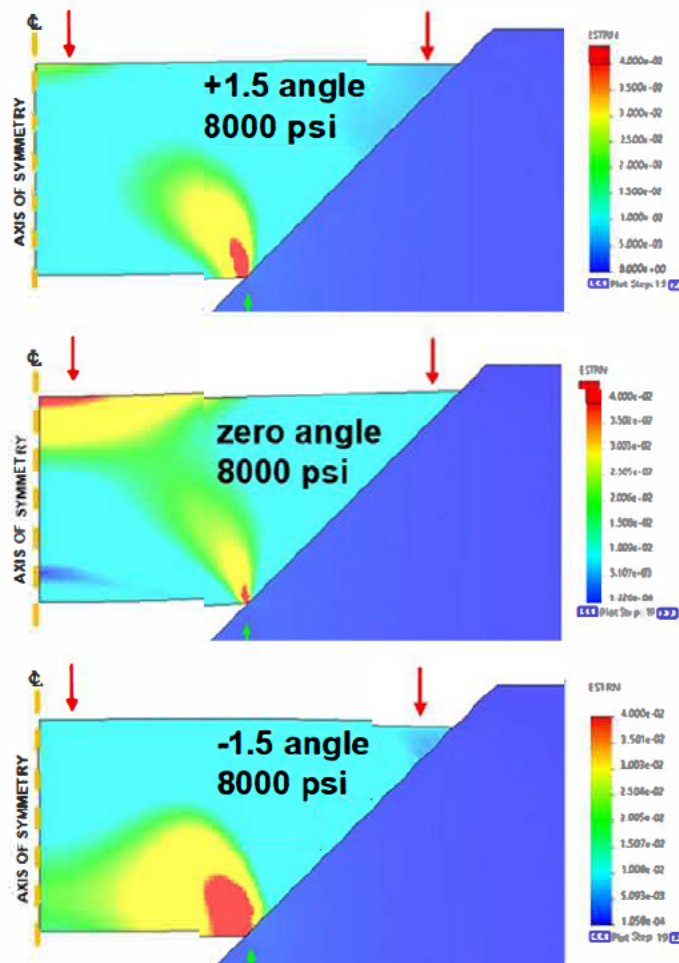
CF	temperature-based Correction Factor
Di	diameter of the window inner face
Do	diameter of the window outer face
r	radius to the shell's mean thickness
STCP	Short Term Critical Pressure
t	thickness of the structure
window	transparent acrylic component
viewport	full assembly including window and seat

### 1. INTRODUCTION

Pressure vessel design has been a significant focus of mechanical engineering for over 100 years. The first ASME edition of the Boiler and Pressure Vessel Code (BPVC) was issued in 1915. As metallurgy, joining techniques, testing methods, and other technologies changed, so did the ASME BPVC. Finite Element Analysis (FEA) is an established part of modern engineering, to include pressure vessel and piping design. While the current code-specified methods are substantially the same as when they were introduced in 2007, Division 2 of Section VIII has allowed for the engineer to use "detailed analysis, such as Finite Element Analysis" since the 1950s [1].

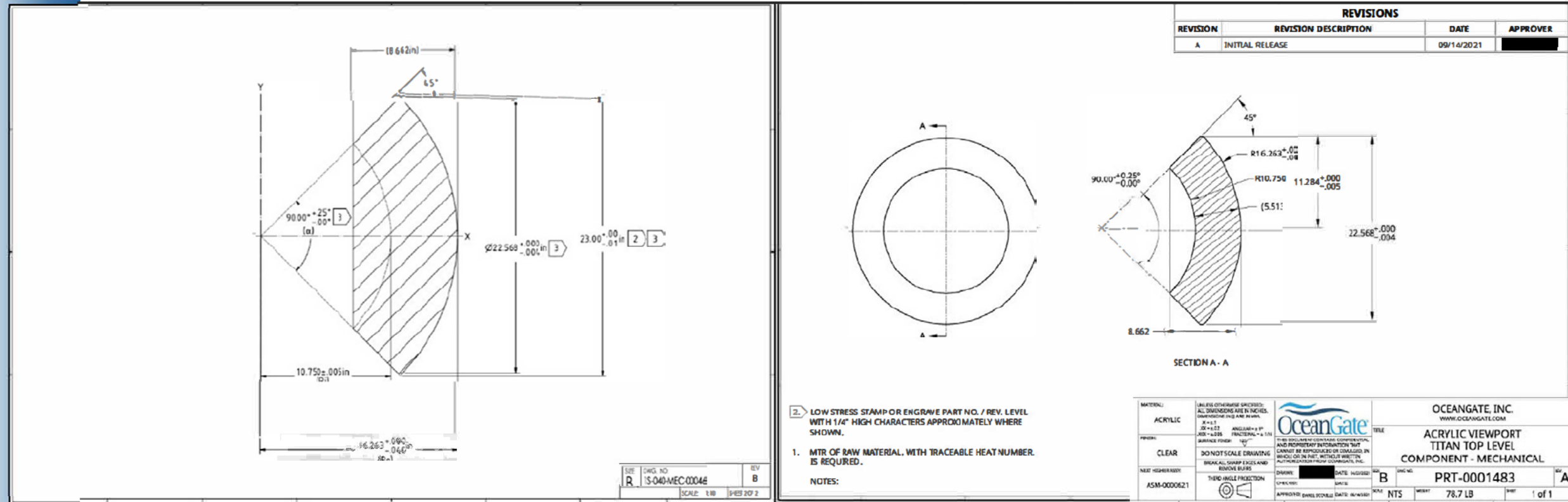
Throughout its history the BPVC has followed classic design paradigm of applying material properties to calculation rules based on engineering principles. Roughly speaking, if you double the strength of the material, you can halve the thickness for a shell under internal pressure. Most pressure vessels can be simplified by membrane theory, or "thin wall" linear assumptions, where a spherical or cylindrical shell can be assumed to be of a sufficiently uniform elastic stress and strain through its thickness that a single value can be used at a given location, barring discontinuities [2]. The general rule of thumb for "thin wall pressure vessel" is that the wall thickness is less than 1/10<sup>th</sup> of the radius of the shell.

By contrast, the ASME design methodology for designing acrylic pressure vessel components has been largely unchanged from its first version published in 1977 where all materials that meet the single specification (Table 2-3.4-1 and 2-3.4-2) result in the same empirically derived design [3]. Doubling or tripling strength in PVHO-1, while meeting all other requirements, has no ability to change a design. The history of the design method was based on the need for transparent windows to support submersibles, commercial diving, and medical chambers. People being inside these pressure vessels were a driving



New analyses modeled the window seat and used nonlinear material and contact elements to allow the window to slide. Used higher order elements with greater mesh density. Examined the role of angular mismatch (less-than-ideal fit). Found significant correlation to historical data, **validates FEA method for acrylic windows.**

# OceanGate Window



Original OceanGate drawing provided in 2017 OG\_USCG\_004796\_TITAN MBI\_Acrylic Viewport Top Level Component.pdf



# OceanGate Window Report (2018)

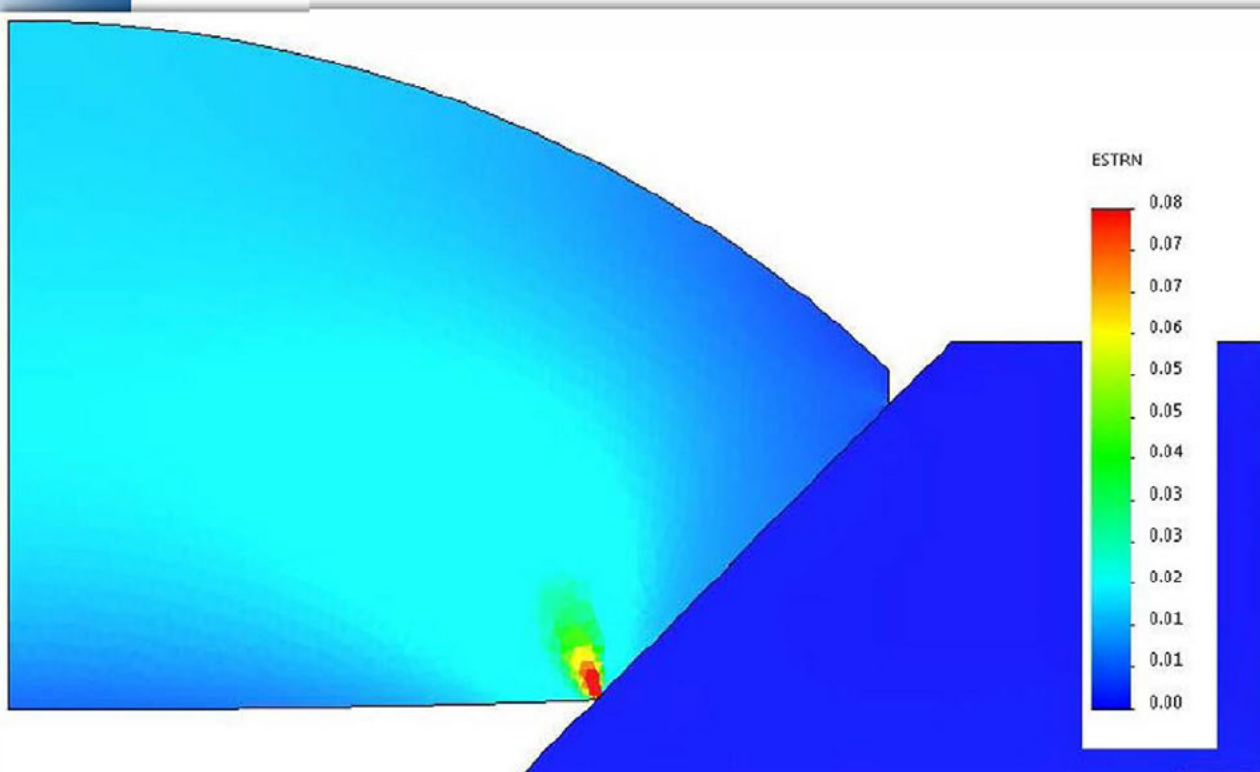


Fig. C5. Nonlinear 5800 psi strain. Strains above 0.06 (red-to-yellow) is of concern. This is consistent with cyclic failure. These results are do not account for heat transfer, dive rates, service life, or creep effects, so any conclusion regarding suitability is preliminary. The intent is to provide a preliminary comparison of the Cyclops design to a flat top design.

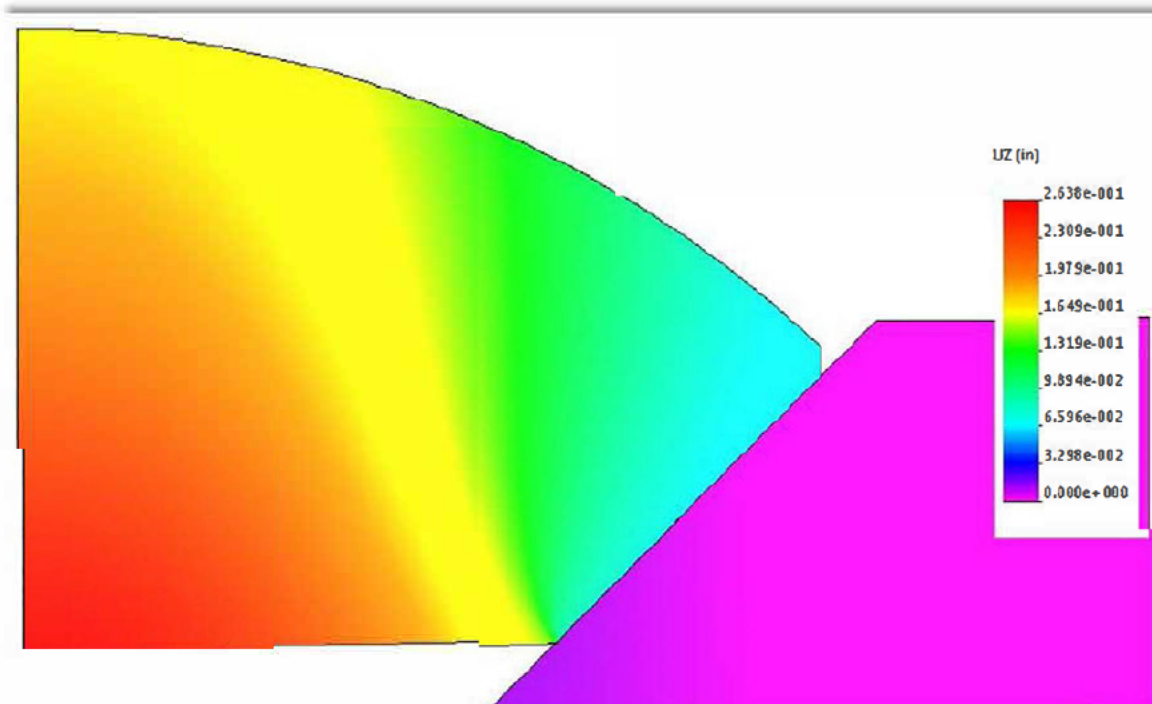


Fig. C6. Nonlinear 5800 psi displacement. Maximum downwards displacement is 0.263 inches.

In news reports, the observed inwards deflection is  $\frac{3}{4}$  of an inch, or 3x the idealized model. It is unknown whether it's measured from the window edge (easier but more severe) or the window's center (per FEA).

# OceanGate Window Report (2018)

From: [REDACTED]  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: Re: Preliminary performance behavior of Flat internal spherical sector windows  
Date: Tuesday, January 30, 2018 1:35:56 PM

Thanks, [REDACTED]

I will consider and discuss with my team.

All the best,

[REDACTED]  
Director of Engineering  
OceanGate, Inc.  
1205 Craftsman Way Suite 112  
Everett, WA 98201

[www.oceangate.com](http://www.oceangate.com)

From: [REDACTED]  
Sent: Tuesday, January 30, 2018 11:08:28 AM  
To: [REDACTED]  
Cc: Stockton Rush; [REDACTED]  
Subject: Preliminary performance behavior of Flat internal spherical sector windows

Please find attached a prelim study of the behavior of a spherical sector window with the flat inside, low pressure, surface.

As we discussed, there is interest among other MUV manufacturers for this same type of geometry. The optical benefits are a strong motivating factor for all involved.

[REDACTED] one of the leading FEA analysts in the US today, an expert in pressure vessels and a specialist in PVHO acrylics.

[REDACTED] is also the chairman of the PVHO viewports committee and the subject at hand is of interest to many.

I asked [REDACTED] to have a look at the interesting behavior exhibited by this geometry. I have done some analysis and others have as well on their own windows.

The results were not what was expected, which I shared with you earlier. In addition, most of the early analysis was done using a linear analysis. This is usually an approximation since acrylic is fundamentally non-linear. Bart agreed to have a precise look into this and do comparative study with linear and non-linear models.

**RESULTS:** Given the results are above the nominal yield of 7500 psi, the strain is used to evaluate potential for failure. Axial (inwards) deflection is provided as another measure.

Model	Cyclops Viewport		Flat top Viewport	
	Max Strain (in/in)	Deflection (in)	Max Strain (in/in)	Deflection (in)
5800 psi Linear	0.12	0.203	0.16	0.394
5800 psi Nonlinear	0.44 (possible cyclic fail)	0.264	0.73 (catastrophic failure)	0.924
4000 psi Nonlinear	0.27 (no failure)	0.174	0.54 (failure)	0.453
2900 psi Nonlinear	0.16 (no failure)	0.123	0.33 (cyclic failure)	0.269

**CONCLUSIONS:** The preliminary conclusions based on the assumptions specified are as follows:

1. The Cyclops design provides more axial stiffness and generates less strain than the same seat dimensions without the domed portion.
2. The specified Cyclops design at 5800 psi indicates significant strain that is consistent with potential short cycle failure modes.
3. The specified Cyclops design at lower pressures indicate acceptable strain levels, with the 2900 psi load being most consistent with traditional PVHO windows operating within normal design conditions.
4. The "flat top" viewport design would be likely to fail at 2900 psi pressure and will fail at higher pressures.
5. Actual material data, the window seat design, and operational information would be needed to conduct a design review and performance prediction.

[REDACTED] asked KES for an analysis of the OceanGate design. The results indicated it was possible the window would fail in cyclic failure. We did not have the head design to analyze the mechanical response of the pressure boundary to the dive profile. **The intent was to start a discussion to agree upon a safer, more reliable solution.**



ED CAST ACRYLIC ACCORDING TO ASME PVHO-1  
FABRICATED ACCORDING TO ASME PVHO-1 FABRICATION  
CERTIFICATIONS AND ANNEAL CHARTS ARE REQUIRED.

ACES SHALL BE POLISHED TO SATISFY ASTM D702 OPTICAL

The drawing shows a dome-shaped component with the following dimensions and features:

- Top horizontal dimension:  $23.00^{+.00}_{-.01}$
- Inner horizontal dimension:  $\phi 22.565^{+.000}_{-.004}$
- Left vertical dimension:  $(8.662)$
- Right vertical dimension:  $16.263^{+.001}_{-.048}$
- Radius:  $R10.750 \pm .005$
- Bottom horizontal dimension:  $(15.203 \text{ REF})$
- Bottom left corner radius:  $R.06^{+.06}_{-.06}$
- Angle:  $90.00^{\circ} \pm .25^{\circ}$  (with  $-.00^{\circ}$  below)
- Detail B: A circular detail view showing a cross-section of the dome with a  $45.00^{\circ}$  angle.
- Scale: **DETAIL B SCALE 1 : 3**

**DO NOT USE ANY  
ORGANIC CHEMICALS**

DESIGN CODE	B: ACCORDANCE WITH AS/NZS 3000:2018
TRANSFORMER	125VA
EVOL	125V
DESIGN PARTS LIST (INTERNAL)	5000 P10 (12.1T P10) 5000 P10 (10.0T)
DESIGN PARTS LIST (EXTERNAL)	5000 P10 (12.1T P10) 5000 P10 (10.0T)
OPERATING TEMPERATURE	0 - 40
SHORT TERM CIRCULAR PRESSURE (P10)	300
THICKNESS (mm)	3.50

**SPECIFICATIONS**

UNLESS OTHERWISE SPECIFIED: 1. DIMENSIONS ARE IN INCHES		NAME	DATE	Hydrospace Group	
2. FINISH: ALUMINUM ANODIZED	DRAWN		12/13/17	TITLE	
3. FINISH: ALUMINUM ANODIZED	CHECKED				
4. FINISH: ALUMINUM ANODIZED	APPROVED		12/13/17		
5. FINISH: ALUMINUM ANODIZED	REVISION 1			1124-4000 m	
6. FINISH: ALUMINUM ANODIZED	REVISION 2			Spherical Sector 90 Deg	
7. FINISH: ALUMINUM ANODIZED	REVISION 3				
8. FINISH: ALUMINUM ANODIZED	COMMENTS:				
MATERIAL	Acrylic	SIZE	DWG. NO.	REV	
FINISH		A	1124-100-01C	NC	
DO NOT SCALE DRAWING	QTY: x1	SCALE: #/#	WGHT	lbs	SHEET 1 OF 1

The data contained herein constitutes proprietary information of Hydrospace Group and shall not be used, duplicated or disclosed in whole or in part without prior written authorization.

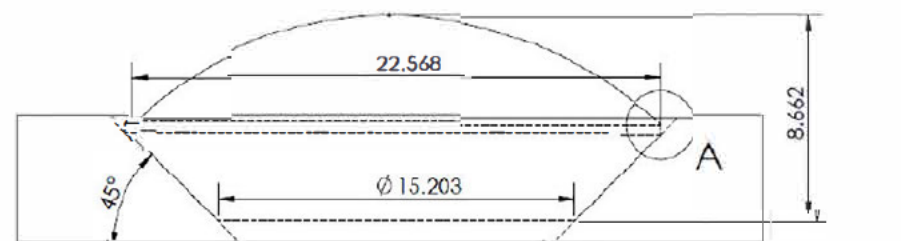
DETAIL B  
SCALE 1 : 3

QTY: x1

SIZE	DWG. NO.
<b>A</b>	1124-100-01C
SCALE: #:#	WRIGHT lbs

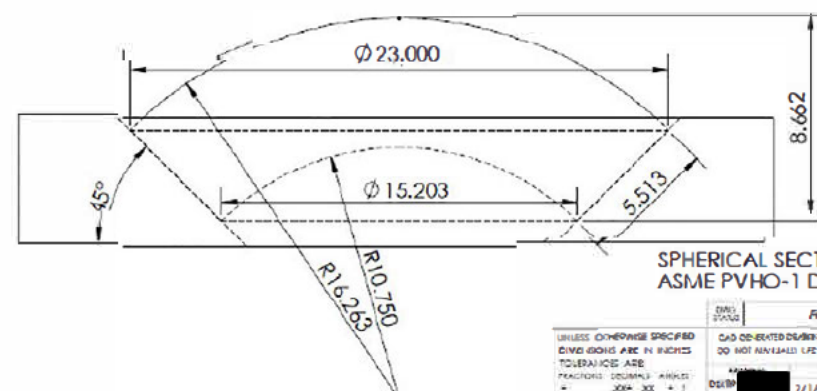
THE INFORMATION CONTAINED IN THIS DRAWING IS THE SOLE PROPERTY OF COMBEE ENGINEERING SERVICES, INC. ANY REPRODUCTION IN WHOLE OR IN PART WITHOUT THE WRITTEN PERMISSION OF COMBEE ENGINEERING SERVICES IS PROHIBITED.

THIS INFORMATION IS NOT FOR CONSTRUCTION USE. IT IS OBSOLETE. THIS INFORMATION DOES NOT REPRESENT AN ONGOING WORK OR PROJECT UNDER CURRENTLY A PROJECT OR SUBJECT.



DETAIL A  
SCALE 2:5

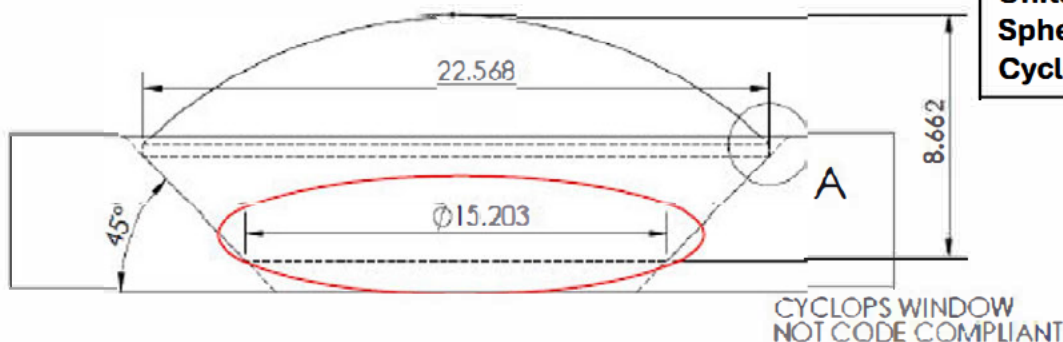
CYCLOPS WINDOW  
NOT CODE COMPLIANT

SPHERICAL SECTOR WINDOW  
ASME PVHO-1 DESIGN

UNLESS OTHERWISE SPECIFIED DIMENSIONS ARE IN INCHES TOLERANCES ARE FRACTIONAL DECIMAL ANGLES = + .004 .003 + .1 XXX .XXX	DATE 1/15/2023	PRINT E. SWART MODELS - NOT FOR CONSTRUCTION
DO NOT OVERSIZE DIMENSIONS DO NOT REVEALED LIFT	DESIGN 1/15/2023	KEMPER ENGINEERING SVCS LLC Baton Rouge LA 70807-0700
MATERIAL	CHG 7/17/2023	FOR NTSB INVESTIGATION TITAN SUBMERSIBLE REVIEW MODELS
FINISH	REVISION VFO DIM	SIZE 1/8" DIA 1/8"
DO NOT SCALE DRAWING	DATE DIM	NTSB-TITAN-1

KES drawings of OceanGate design and the ASME PVHO-1 spherical sector equivalent

# ASME PVHO-1 Window Design



Units are US Customary to be consistent with OceanGate. Spherical sector window in the same footprint as the Cyclops II (Titan) window design, but uses less acrylic.

Table 2-2.3.1-3 Conversion Factors for Acrylic Spherical Sector Windows With Conical Edge, Hyperhemispherical Windows With Conical Edge, and NEMO-Type Windows With Conical Edge

Operational Pressure Range	Temperature, °F (°C)				
	50 (10)	75 (24)	100 (38)	125 (52)	150 (66)
$N = 1$ 2,500 psi (17.2 MPa)	CF = 4	CF = 6	CF = 8	CF = 10	CF = 16 1,500 psi (10.3 MPa)
$N = 2$ 5,000 psi (34.5 MPa)	CF = 4	CF = 6	CF = 8	CF = 10 3,500 psi (24.1 MPa)	3,000 psi (20.7 MPa)
$N = 3$ 7,500 psi (51.7 MPa)	CF = 4				

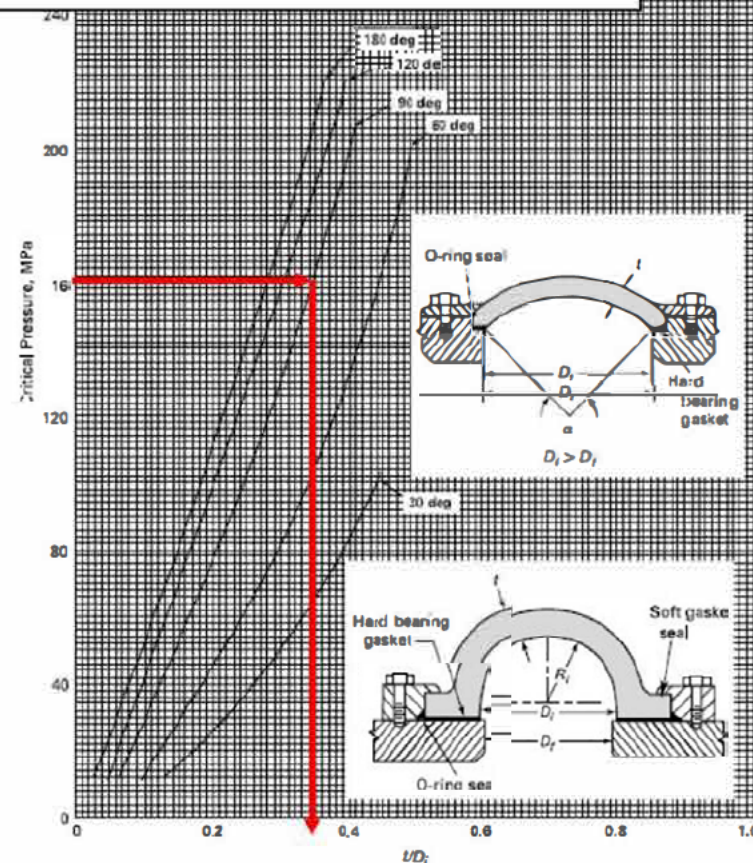
**GENERAL NOTES:**

- (a) The CFs in this Table apply only to STCFs plotted in Figures 2-2.5.1.6 and Figures 2-2.5.1.7 for spherical sector windows with conical edge and Figures 2-2.5.1.14 and 2-2.5.1.15 for hyperhemispherical windows with conical edge and NEMO-type windows with conical penetrations.  
(b) Dotted lines refer to intermediate pressure ranges as indicated by the adjacent pressure figures.  
(c) Interpolation between CFs is allowed.

Design pressure = 5800 psi

CF for 5800 psi = 4

STCF = 4 \* 5800 psi = 23,200 psi (160 MPa) (Use 160 MPa due to graph units)

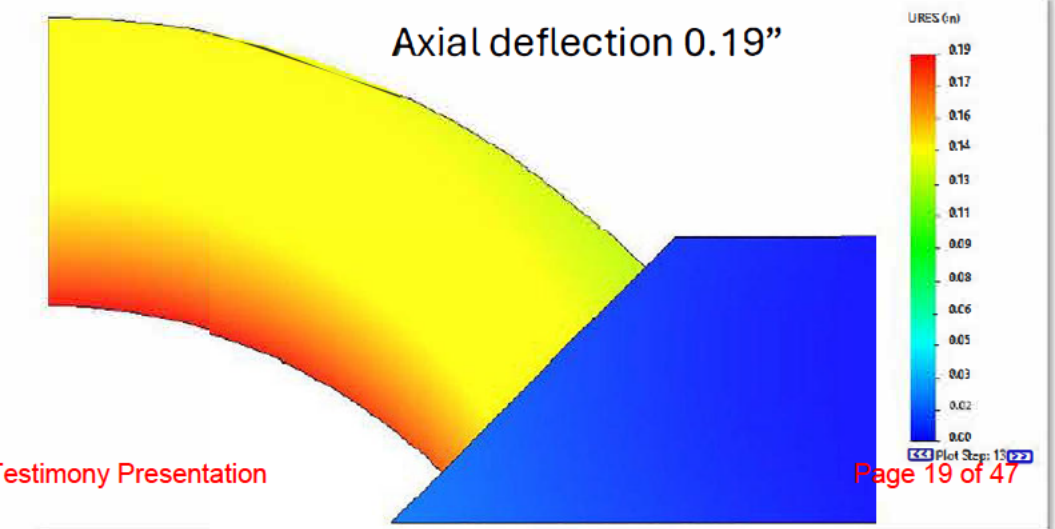
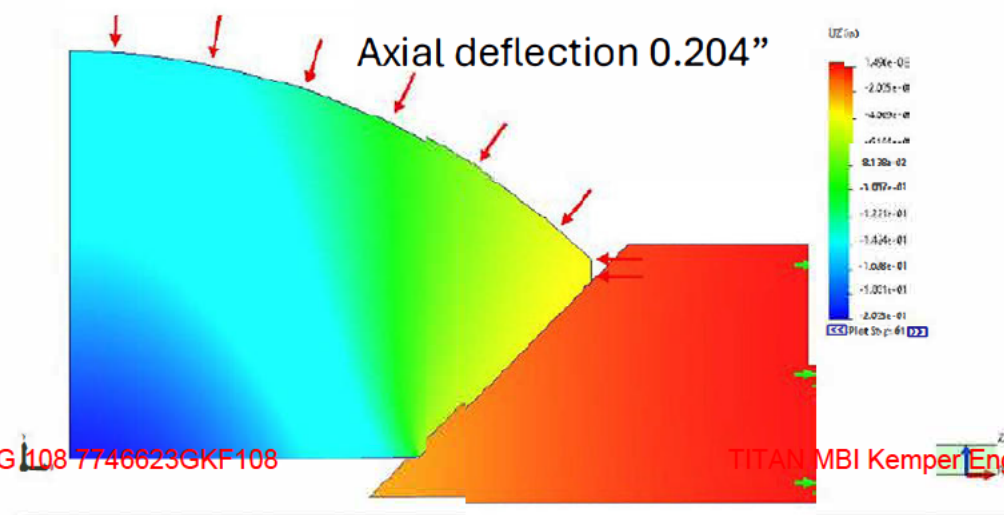
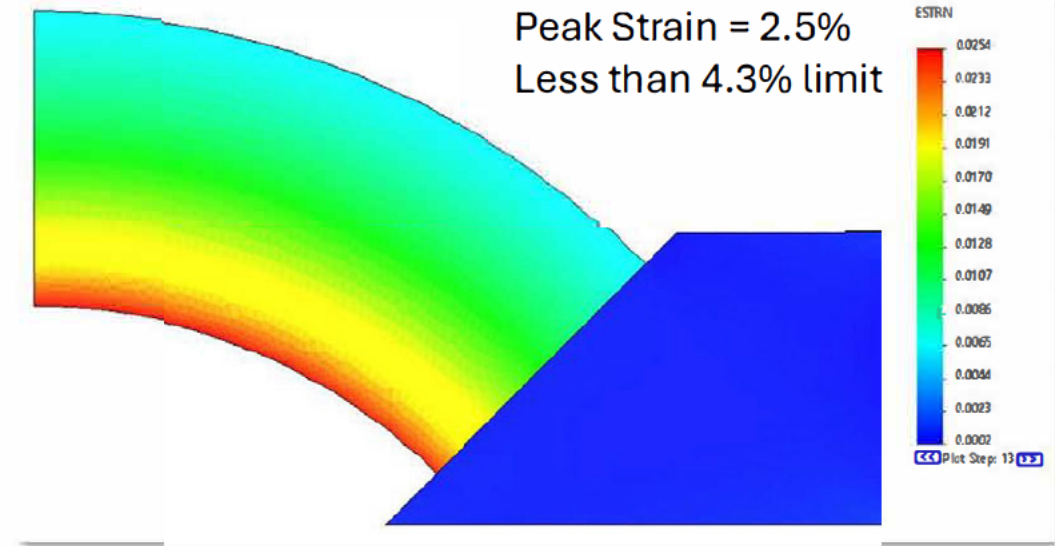
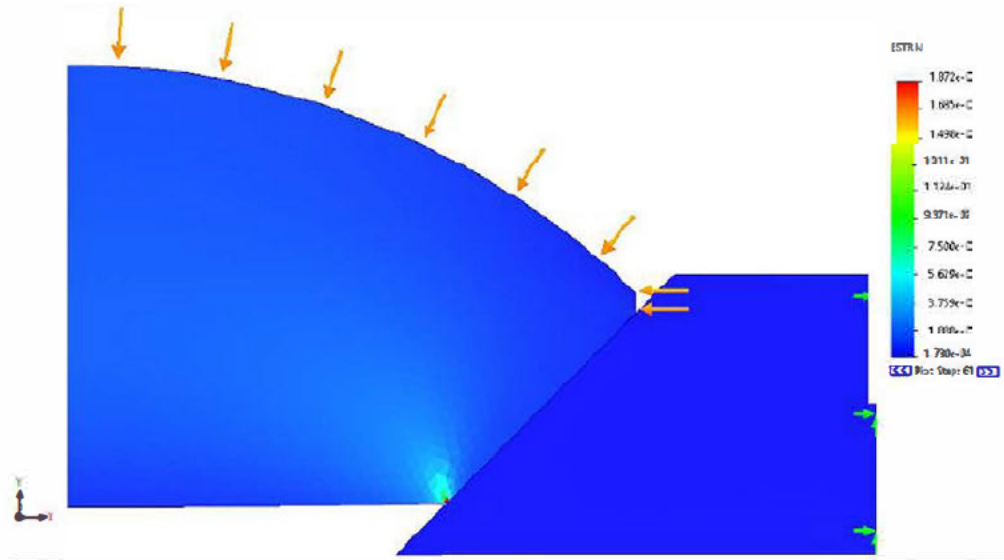


$t/D_i = 0.36$

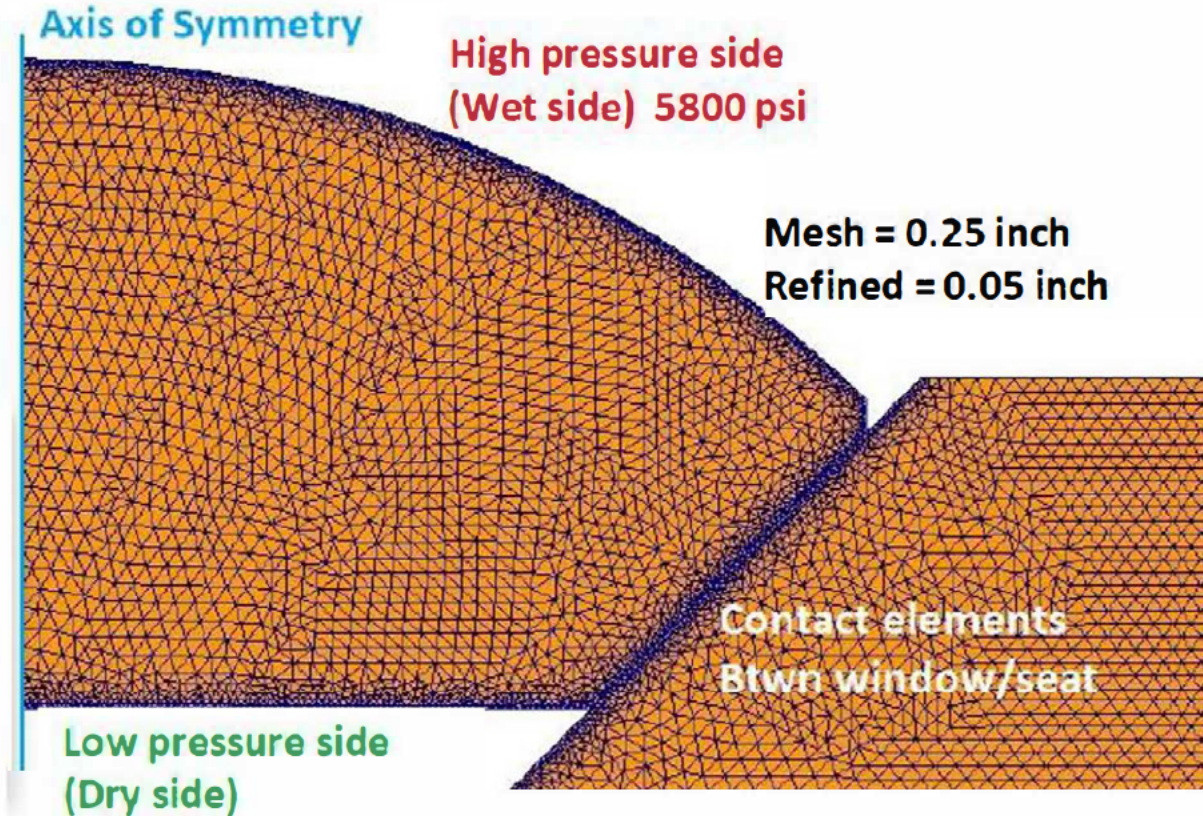
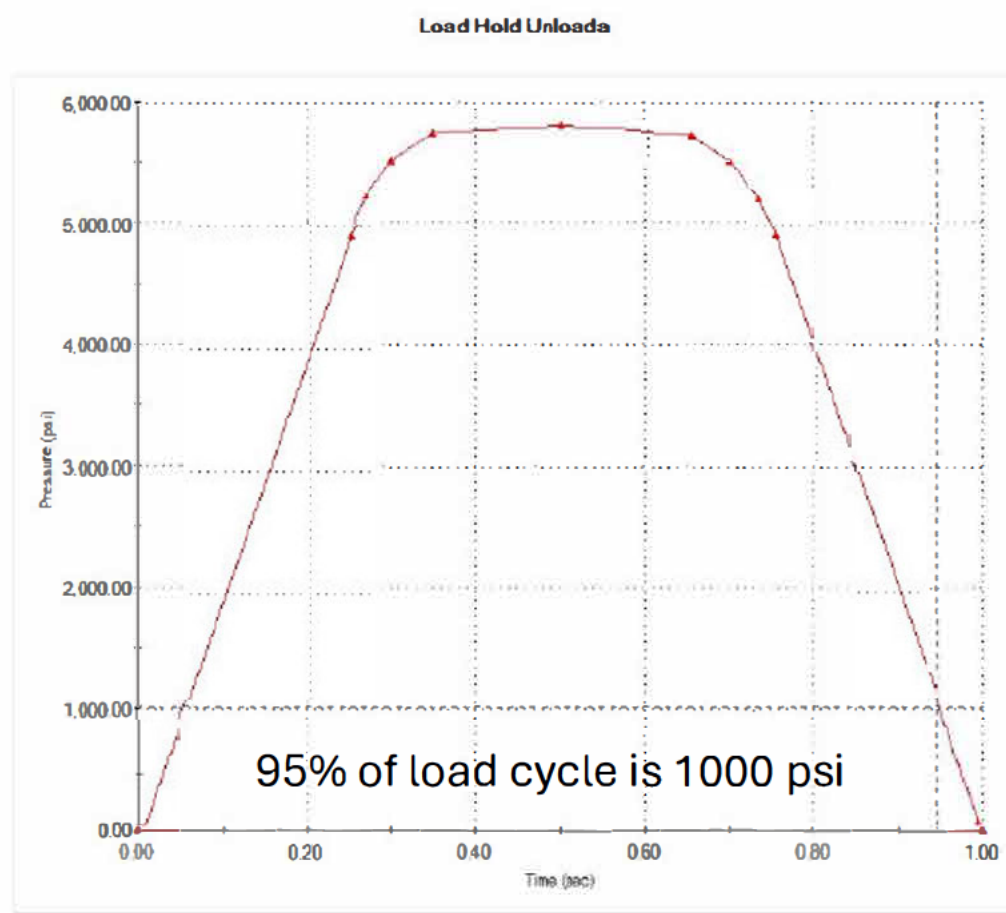
$t = D_i * (t/D_i) = 15.2 * 0.36 = 5.47$  inches, rounded up to 5.5 inches



# Post incident analysis (full depth)



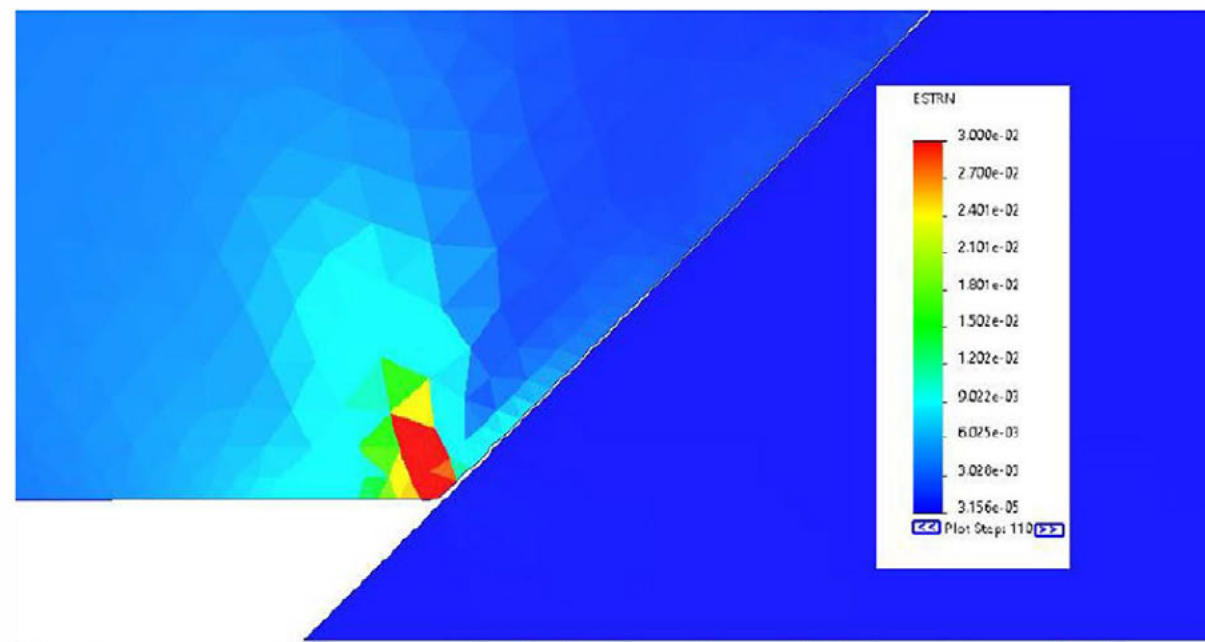
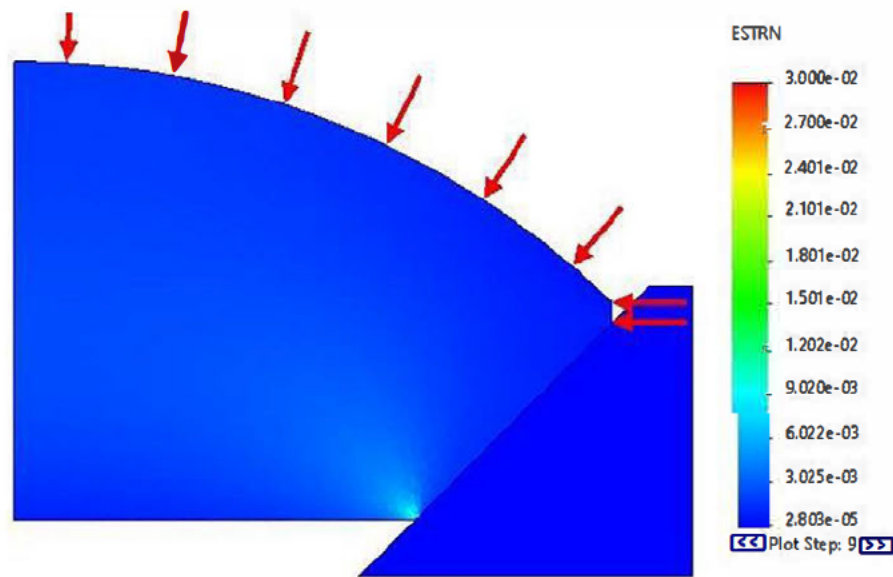
# Post-incident analysis (1 cycle, no creep)



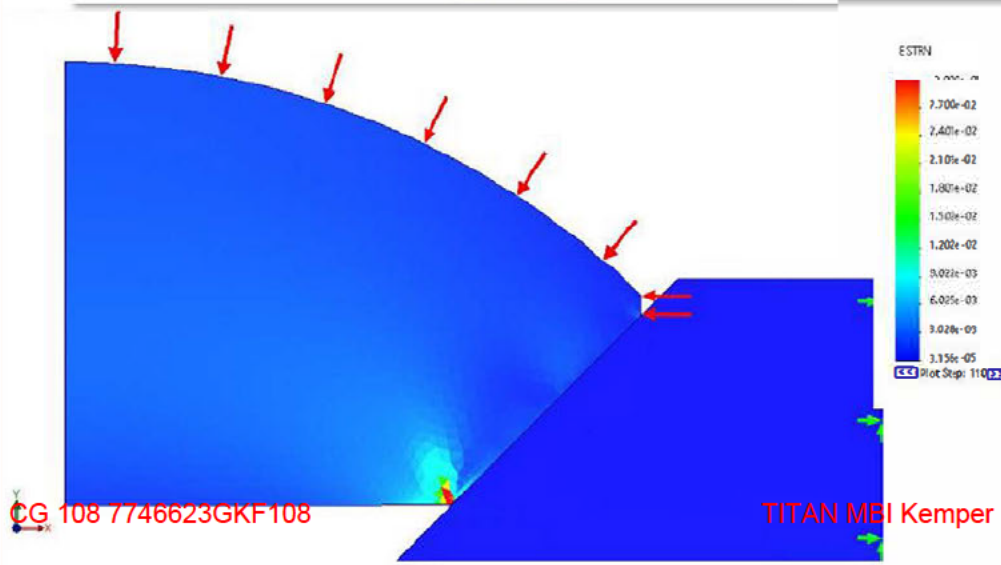
Later analysis used a cyclic loading/unloading to assess the potential for progressive creep due to plastic deformation.



# Post-incident analysis (1 cycle)



Upper left shows the full range of strain at 1000 psi loading is 1% strain (0.023" center). At the same 1000 psi in unloading, the 16% peak strain (0.032" center), then both are shown at 3% strain. The upper region remains elastic. There is significant residual strain and deflection after one cycle. **Each cycle creates more deflection, strain at low pressure face.** No creep (cold flow) modeled.



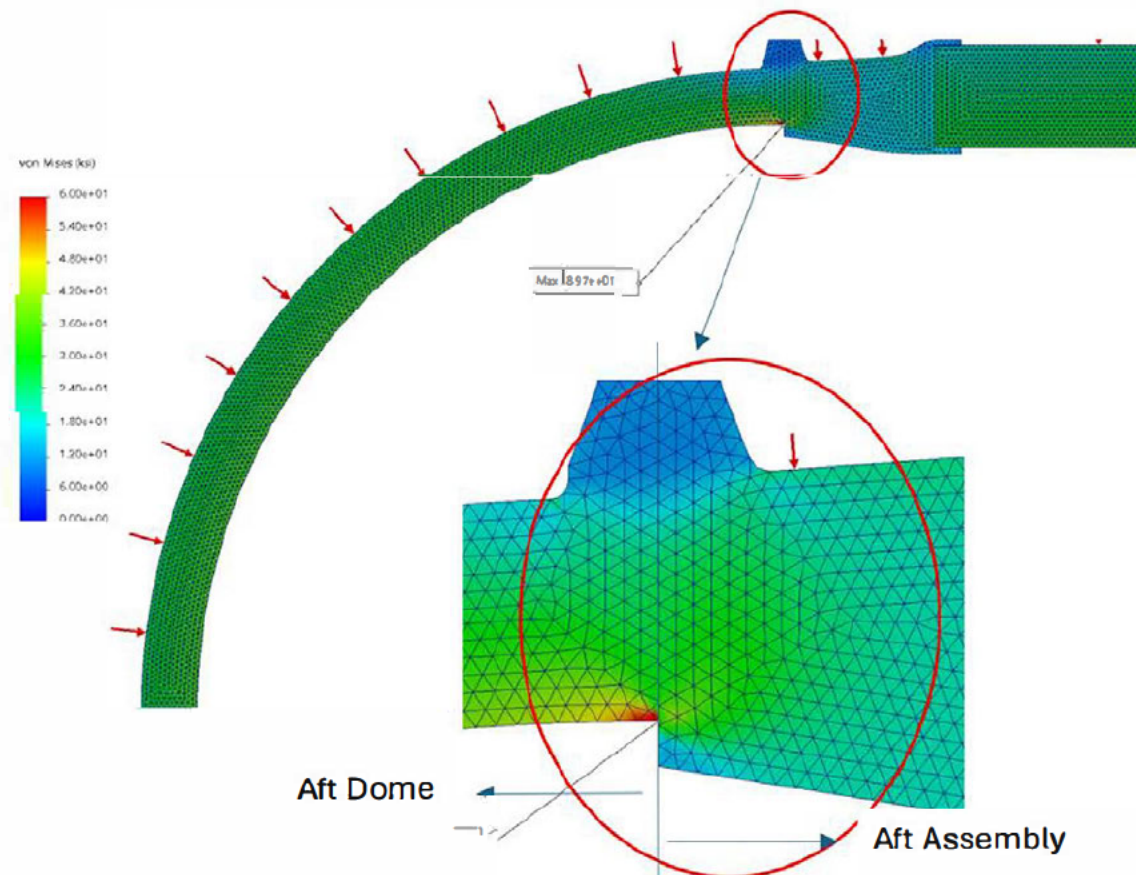
# Titanium domes & ring

Tensile strength (min)			0.2% yield strength (min)	
Designation	MPa	ksi	MPa	ksi
<b>Unalloyed grades</b>				
ASTM grade 1	240	35	170	25
ASTM grade 2	340	50	280	40
ASTM grade 3	450	65	380	55
ASTM grade 4	550	80	480	70
ASTM grade 7	340	50	280	40
ASTM grade 11	240	35	170	25
<b><math>\alpha</math>-<math>\beta</math> alloys</b>				
Ti-6Al-4V(a)	900	130	830	120
Ti-6Al-4V-ELI(a)	830	120	760	110
Ti-6Al-6V-2Sn(a)	1030	150	970	140

## Grade 5 (Ti 6Al-4V) to Grade 3

Yield 120 ksi  $\rightarrow$  55 ksi = 45% of Gr5

Tensile 130 ksi  $\rightarrow$  65 ksi = 50% of Gr5



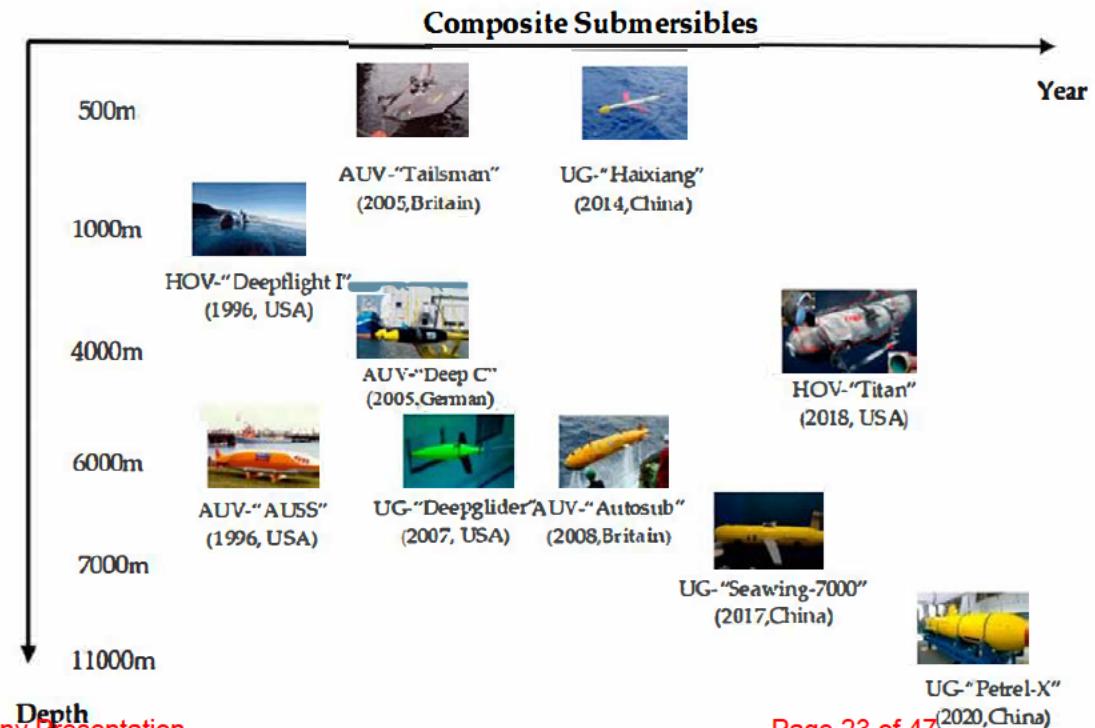
Initial linear results indicates **no danger of collapse**, detailed analysis will be in the report.

**Insufficient data to evaluate the glued joints.**

# Why carbon fiber

- Long lead time, high costs with alloy steel or titanium
- Normalized for tensile load, carbon fiber-reinforced composites are 70 percent lighter than steel and 40 percent lighter than aluminum. **Key for submersibles.**
- Ultimate tensile strength: steel 400 - 690 MPa, carbon fiber 1,200-2,410 MPa, depending on fiber orientation.
- Long-term corrosion resistance to chemical and temperature environments.
- Generally less expensive material and fabrication, depending on labor, novelty.
- Long lead time with alloy steel or titanium, constrains production
- Compressive strength and shear resistance is problematic with carbon fiber.

(Fig ref 36)





# Examples of carbon fiber



Article

## Numerical Analysis of Sandwich Composite Deep Submarine Pressure Hull Considering Failure Criteria

College of Engineering, Northeast Agricultural University, Harbin 150030, China; Eng\_anah\_jeld@yahoo.com (M.L.); huinanhua0126163.com (H.L.)

Key Laboratory of Swine Facilities Engineering, Ministry of Agriculture, Harbin 150030, China

Department of Mechanical Engineering, Faculty of Engineering, Taif University, Taif 21974, Saudi Arabia

Production and Mechanical Design Dept., Faculty of Engineering, Mansoura University, Mansoura 30516, Egypt

Department of Civil Engineering, Military Technical College, Kutubia, Cairo 11565, Egypt

\* Correspondence: jdwang0208@163.com (J.W.); saidhabib2000@hotmail.com (S.E.)

Received: 2 October 2019; Accepted: 19 October 2019; Published: 22 October 2019

**Abstract:** The pressure hull is the primary element of submarine, which withstands diving pressure and provides essential capacity for electronic systems and buoyancy. This study presents a numerical analysis and design optimization of sandwich composite deep submarine pressure hull using finite element modeling technique. This study aims to minimize buoyancy factor and maximize deck area and buckling strength factors. The collapse depth is taken as a base in the pressure hull design. The pressure hull has been analyzed using two composite materials, T700/Epoxy and B(4)5505/Epoxy, to form the upper and lower faces of the sandwich composite deep submarine pressure hull. The laminated control surface is optimized for the first ply failure index (F) considering both Tsai-Wu and maximum stress failure criteria. The results obtained emphasize an important fact that the presence of core layer in sandwich composite pressure hull is not always more efficient. The use of sandwich in the design of composite deep submarine pressure hull at extreme depths is not a safe option. Additionally, the core thickness plays a minor role in the design of composite deep submarine pressure hull. The outcome of an optimization at extreme depths illustrates that the upper and lower faces become thicker and the core thickness becomes thinner. However, at shallow-to-moderate depths, it is recommended to use sandwich composite with a thick core to resist the shell buckling of composite submarine pressure hull.

**Keywords:** multi-objective optimization; sandwich composite; buoyancy factor; Tsai-Wu; failure criteria

Optimization plays an important role in obtaining the best composite hull with high efficiency and safe use of materials. Most submarine designs are weight critical, especially when the operational diving depth increases. Therefore, the designers will strive to select an available high strength and low-density material. Diving depth is an essential criterion for designing a submarine pressure hull for a certain collapse depth at which failure must be expected within a narrowly limited range of tolerance [1]. Working at depths of several kilometers requires perception of how hydrostatic pressure affects both structures and materials [2]. Changing the hull weight allows the vessel to submerge and change depth in a controlled manner. A submarine is not allowed to go further than the service diving depth [3,4]. At great depths, composite materials are the only solution available. The design and analysis of composite structures are more complicated than metallic structures, through

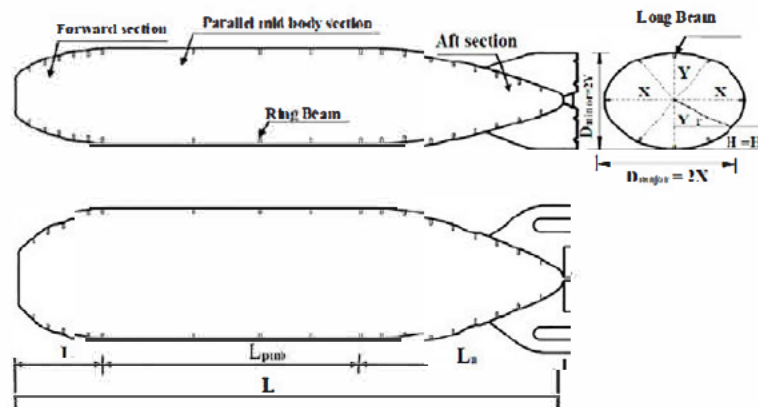
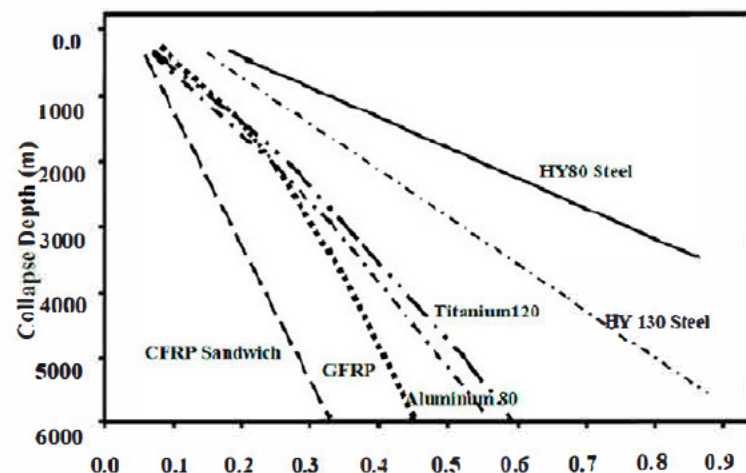
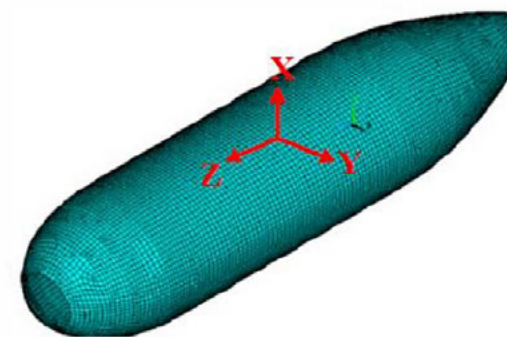
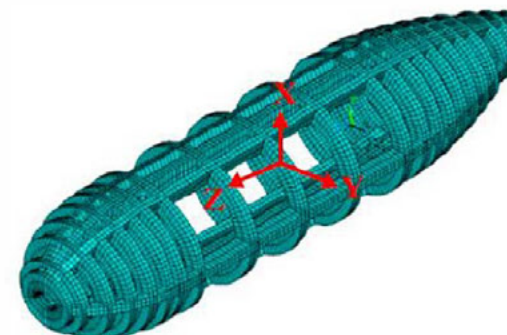


Figure 1. Parameterization of non-circular submersible pressure hulls.



a) Shell element (SHELL281).



b) Beam element (BEAM189).

Figure 4. Mesh of global model.

# Examples of carbon fiber

Advances in Composite Science and Technology

IOP Publishing

IOP Conf. Series: Materials Science and Engineering 683 (2019) 012072 doi:10.1088/1757-899X/683/1/012072

## Finite element modelling and multi-objective optimization of composite submarine pressure hull subjected to hydrostatic pressure

<sup>1</sup>Department of Civil Engineering, Military Technical College, Cairo, Egypt.

<sup>2</sup>Ships and Submarines Engineering Department, Military Technical College, Cairo, Egypt

<sup>3</sup>Department of Mechanical Engineering, Faculty of Engineering, Taif University, Taif 21974, Saudi Arabia

<sup>4</sup>Production and Mechanical Design Dept., Faculty of Engineering, Mansoura University, Mansoura 35516, Egypt

E-mail: saidhabib2000@mtc.edu.eg, saidhabib2000@hotmail.com

**Abstract.** The design of submarine pressure hull made of laminated composites depends on number of layers and fibre orientation of ply angle. In the present study an overview and comprehensive study about the multi-objective optimization of composite pressure hull under hydrostatic pressure to minimize the weight of the pressure hull and increase the buckling load capacity according to the design requirements. Three models were constructed, two models constructed from Carbon/Epoxy composite (USN-150) with and without core layer the third model is metallic submarine hull constructed from HY100. The low-density PVC foam material is used as a core material. The optimization process is carried out in ANSYS Parametric Design Language (APDL). The constraints on the optimization process are Tsai-Wu and maximum stress failure criteria. The results obtained emphasize that the submarine constructed from Carbon/Epoxy composite (USN-150) is better than the submarine constructed from HY100. Furthermore, the submarine constructed from carbon fiber-epoxy composite (USN-150) with core layer is better than the submarine constructed from carbon fiber-epoxy composite (USN-150) without core layer. Finally, an optimized model with an optimum pattern of fiber orientations was presented. Hopefully, the results may provide a valuable insight for the future of designing composite underwater vehicles.

**Keywords:** Multi-objective optimization; buckling load; composite pressure hull; failure criteria

### 1. Introduction

The excellent mechanical properties and behaviour of composite material make composite as a suitable material for underwater pressure hull and helps to reduce the structure's weight [1]. Design optimization of composite submerged pressure hull and buckling behaviour has been attracted some recent attention [2-13]. Mian et al. [14], presented the design optimization procedure for composite. This work is licensed under the Creative Commons Attribution 3.0 Unported License. To view a copy of this license, visit <http://creativecommons.org/licenses/by/3.0/> or send a letter to Creative Commons, PO Box 1866, Mountain View, CA 94042, USA.

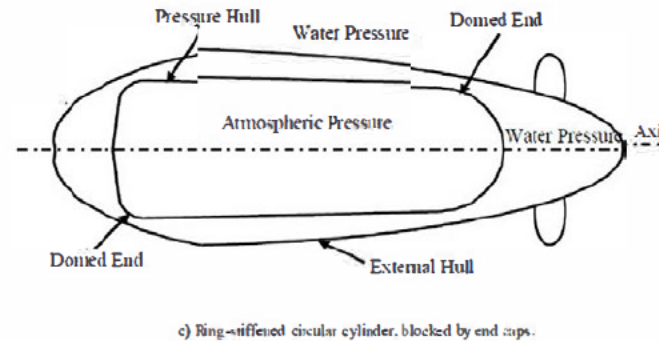
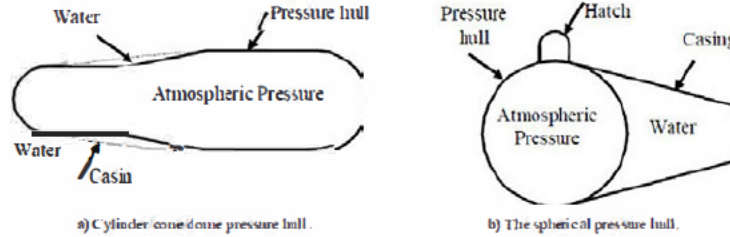


Figure 1 Possible forms of submerged vehicles.

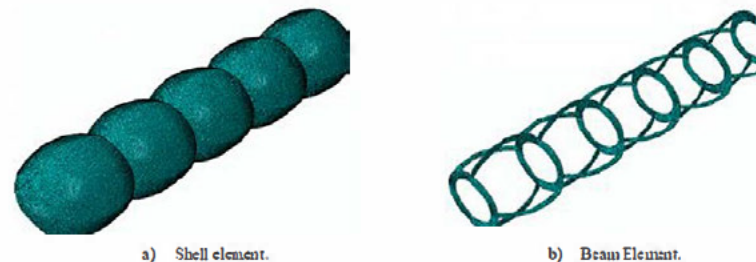


Figure 3 Finite element modeling of the cross-clinical submarine pressure hull

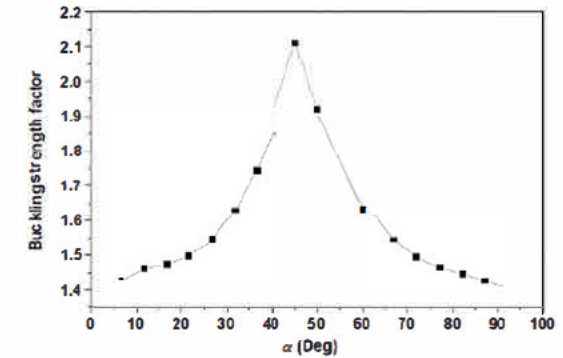
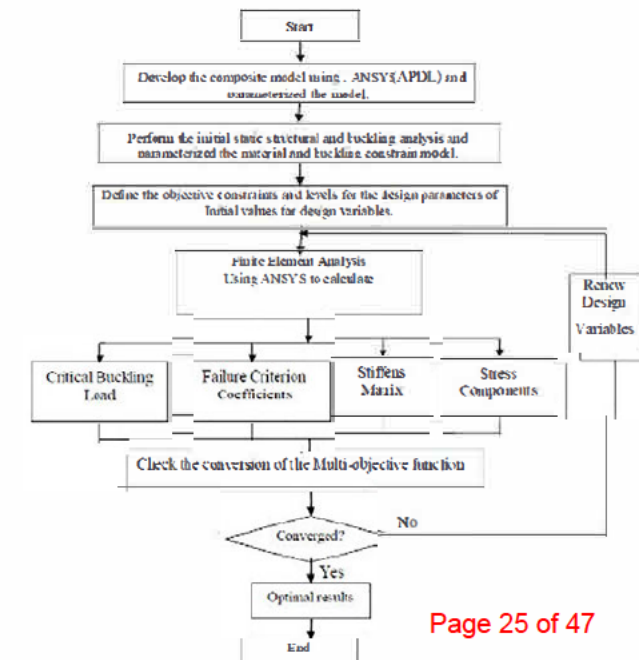


Figure 5 Effect of buckling strength factor by fiber orientation  $\alpha$





# Example of Factors to Consider



## A Review on Structural Failure of Composite Pressure Hulls in Deep Sea

China Ship Scientific Research Center, Wuxi 214062, China  
Tribus Laboratory of Deep-sea Technological Science, Wuxi 214062, China  
National Key Laboratory on Ship Vibration & Noise, Wuxi 214062, China  
Harbin Institute of Technology (Weihai), Weihai 264209, China  
Correspondence: yuchangli@hitwh.edu.cn

**Abstract:** With the increasing application and study of lightweight and high strength fiber reinforced polymer composites in ocean industry, the structural failure problem of composite pressure hulls has attracted great attention from many researchers in China and globally. Analysis of the structural failure mechanisms is foundational to the design of deep-sea composite pressure hulls, since nowadays the design rules of pressurized vessels is mostly formulated according to their failure modes. Hence, this paper aims to review the research on the structural failure of composite pressure hulls in deep sea settings. First of all, the applied research status on composite material in marine equipment is analyzed, including inspection modalities for composite pressure hulls. The review then focuses on the three main failure modes, namely overall buckling, material failure and snap buckling of the deep-sea composite pressure hulls. The study identifies further problem of composite pressure hulls to be solved through the application of the deep-sea equipment research, aiming to provide a reference for the study of mechanical behavior, ultimate strength computation, and design of thick composite pressure hulls for deep-sea equipment.

**Keywords:** marine equipment; composite material; pressure hull; structural failure

### 1. Introduction

In recent years, the research frontier of equipment technology has developed rapidly in the deep-sea field. Various types of high-tech deep-sea equipment have been widely used in marine scientific research, resource exploration, military security and other fields. The composite pressure hull of a submersible is the main provider of buoyancy and its weight accounts for about 1/4–1/2 of the total weight of the underwater vehicle. Perhaps the most critical consideration for the pressure hull of a submersible is the weight to displacement ratio. The structural material of a pressure hull is one of the main factors that determines its weight-displacement ratio and structural bearing capacity, which is also related to the progressiveness and reliability of submersibles. High strength steel is the most widely used material in general submersibles, and in recent years, titanium alloys with higher specific strength have been gradually adopted. However, deep submersibles have higher material requirements for specific strength and stiffness. Considering all the factors, fiber reinforced polymer (FRP) has greater advantages. In addition to high specific strength and specific stiffness characteristics, composite materials also have a comprehensive range of properties, such as the excellent designability, seawater corrosion resistance, acoustic stealth and fatigue resistance. Therefore, composite materials are ideal structural materials for deep-sea pressure hulls, and have been widely studied by scholars [1–5]. They have been used in deep-sea submersibles worldwide, such as Autonomous Underwater Vehicles (AUV) [6,7], Underwater Glider (UG) [8–11] and Human Occupied Vehicle (HOV) [12–14]; see Figure 1. Composite materials also have great potential in marine equipment, such as composite

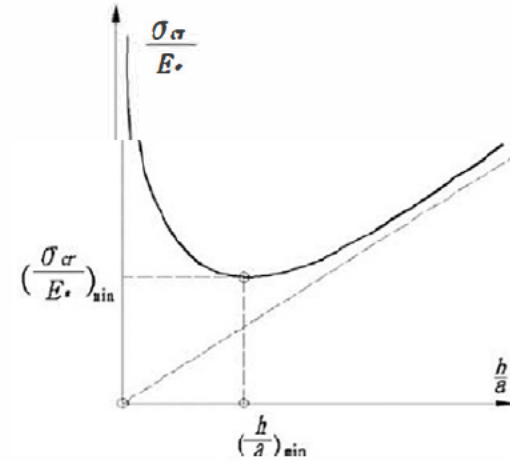
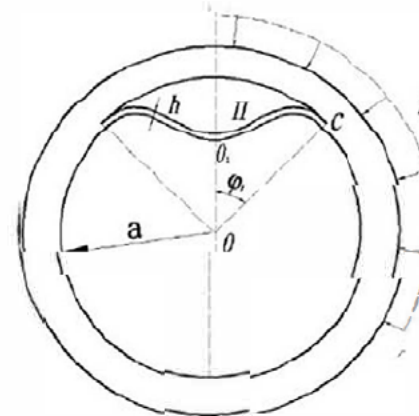


Figure 9. Delamination buckling failure mode and critical load of deep sea thick shell

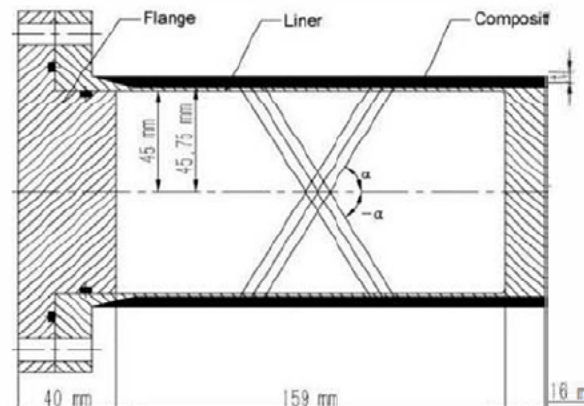


Figure 3. Hydrostatic damage test of carbon fiber composite pressure hull with aluminum liner



Citation: Li, Y.; Yu, C.; Wang, W.; Li, H.; Tang, X. A Review on Structural Failure of Composite Pressure Hulls in Deep Sea. *J. Mar. Sci. Eng.* **2022**, *10*, 1456. <https://doi.org/10.3390/jmse10101456>

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25 SEP 2024



# Examples of Factors to Consider

31th International Conference on Ocean, Offshore and Arctic Engineering  
OMAE 2012  
June 10-15, 2012, Rio de Janeiro, Brazil

OMAE2012-83378

## MEASUREMENT OF BENDING RESIDUAL STRESS ON A HULL SECTION OF A SUBMARINE

VEQTER Ltd.  
Bristol, UK

VEQTER Ltd.  
Bristol, UK

VEQTER Ltd.  
Bristol, UK

Loiret, France

Bristol, UK

### ABSTRACT

Explicit understanding of the residual stress field of primary submarine pressure hull induced during fabrication will improve the fidelity of numerical analysis and experimentation. Hence, supporting operational envelope and design life extension initiatives.

The fatigue lifetime of a submarine hull depends on the loads generated by hull contraction under the effect of hydrostatic pressure and the residual stresses existing in the absence of external loading. The use of numerical simulation allows a straightforward calculation of the stresses induced by the hydrostatic pressure. The effect of residual stress could be determined using the current failure assessment procedures, like BS7910 and R6. However it is more intricate to determine the residual stresses resulting from the sheet bending process combined with the sheet assembly using a multipass welding process.

There are several measurement techniques available to measure residual stresses. They are often classified by their level of destructiveness and their penetration. In order to compare the different measurement techniques an elastic-plastic beam bend sample has been chosen as it is very comparable to the residual stress field induced during the sheet bending process used in the submarine structure. Four bend beams have been measured using five different techniques: Incremental centre hole drilling, ring core, neutron diffraction, slitting and deep hole drilling technique. The results from measurement

techniques show an excellent agreement when compared with the FEA.

In order to measure a full scale Rubis class submarine hull a limited number of techniques can be used, as the technique needs to be portable. The Deep Hole Drilling (DHD) technique was chosen because the neutron diffraction would require extracting a small test sample of about 400mm x 400mm, hence redistributing the residual stresses that were intended to be measured. Six measurements were carried out at different angular positions to detect variability in manufacture on a Rubis class submarine and a probabilistic calculation was done using all six DHD measurements. The Rubis class measurement results are also compared with two other submarine types, found in the literature.

Understanding the three-dimensional behaviour of residual stress in this type of structure provides a valuable resource to the numerical modelling community. The results can also support fatigue and fracture experimental work and may help increasing the operating life of 25 year old French nuclear submarine.

### INTRODUCTION

Efforts have been made to establish and improve ultimate submarine design life limits. The residual stresses induced by manufacturing, like rolling and welding, are variables required for analysis of various degradation mechanisms associated with the aggressive conditions experienced by a submersible (buckling, fatigue, stress corrosion cracking). In a submarine structure, the hull is essentially composed of rolled plates and

## Moisture diffusivity of CFRE for an AUV hull at 1000m depth

OsloMet University Department of Mechanical, Electronic and Chemical Engineering  
Oslo Metropolitan University  
Oslo, Norway

OsloMet University Department of Mechanical, Electronic and Chemical Engineering  
Oslo Metropolitan University  
Oslo, Norway

OsloMet University Department of Mechanical, Electronic and Chemical Engineering  
Oslo Metropolitan University  
Oslo, Norway

**Abstract**—The hull of an Autonomous Underwater Vehicle (AUV) is one of the main factors that determine its overall compressibility and drag. The hull as well, acting as a pressure vessel, is the most essential part that will allow the vehicle to operate at deep diving. In order to minimize the total weight and volume of the vehicle, many modern vehicles benefit from composite materials rather than conventional materials. Moisture absorption, known as delamination, has a significant impact on the mechanical properties of the material. Not to mention it also has an effect on the buoyancy of the vehicle, since the overall weight changes. This paper characterizes the moisture absorption and diffusivity of Carbon Fiber Reinforced Epoxy (CFRE) pressure hull samples in ambient conditions at sea level and at 1000m depth. The tests were performed using test vessels from OsloMet University and using a pressure vessel. Twelve specimens, all manufactured from CFRE using filament winding technique, were tested in both conditions, and the moisture absorption ratio is compared. Periodic gravimetric measurements were taken, where the equilibrium state was reached after approximately 65 days at sea level and within 35 days at 1000m depth. The results showed that moisture diffusivity for composites used in underwater applications should be defined by both pressure and temperature due to changes with respect to submersion depth.

**Keywords**—Carbon fiber reinforced epoxy; Hygral effect; Time-dependent moisture diffusion; Seawater aging; Environmental degradation.

### 1. INTRODUCTION

The hull of an Autonomous Underwater Vehicle (AUV) is one of the main factors that determine the overall compressibility and drag. Since these characteristics have a great impact on the endurance and the cost of the vehicle, the detailed design of the hull is of paramount importance to the good performance of the vehicle. The hull, acting as a pressure vessel, is the most essential part that will allow the vehicle to operate at high depth. In order to minimize the total weight and volume of the AUV, its hull should be as light as possible. Fiber-reinforced composites offer a greater strength-to-weight ratio in comparison with conventional materials, such as metals. Carbon Fiber-Reinforced Epoxy (CFRE) in particular, is commonly used in many applications, including marine ones, because of the outstanding performance throughout its design life [1].

A critical aspect of the performance of composites is their moisture content and their ability to absorb humidity. Hygral effect has a substantial impact particularly in the long-term use of the component on the chemical and physical characteristics of the composite. Water absorbed by the epoxy matrix of the composite can be categorized into two types

based on their bonding with the matrix [1]. The first type forms a single hydrogen bond with the resin; hence it can be removed easily by increasing the temperature of the material, unlike the second type which forms multiple hydrogen bonds with the matrix, which requires even higher temperatures to be removed from the material [2]. The first type, however, has a higher effect on the material due to the fact that it diffuses more easily in the resin, breaking the initial Van der Waals bonds resulting in swelling of the material and contributes highly to the plasticization of the resin, unlike the second type which does not contribute much to the plasticization, rather, it creates secondary crosslinking between chain segments of the resin, resulting in what is known as pseudo crosslinking, as shown in Figure 1 [2]. This type is harder to form in the material since it requires a long exposure time as well as high temperatures for the inter-chemical bonds to form. Although a hull of a submersible vehicle is exposed to water for a very long time, the temperature gradient of the ambient environment is not high enough to form the second type.

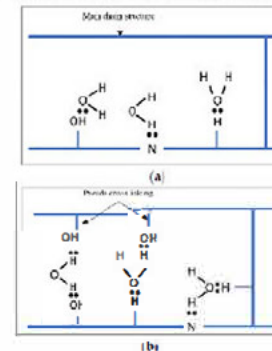


Fig. 1. Water bonding with the matrix of the composite. (a) Hydrogen primary bonding. (b) Pseudo secondary bonding.

One important aspect of the moisture content is that it decreases the glass transition temperature of the matrix ( $T_g$ ) which reduces the bonding between the reinforcement and the matrix affecting the mechanical behavior of the composites and their durability. Reference [3] found that the modulus of

## An experimental investigation of the temperature effect on the mechanics of carbon fiber reinforced polymer composites

Department of Mechanical Engineering, State University of New York at Stony Brook,

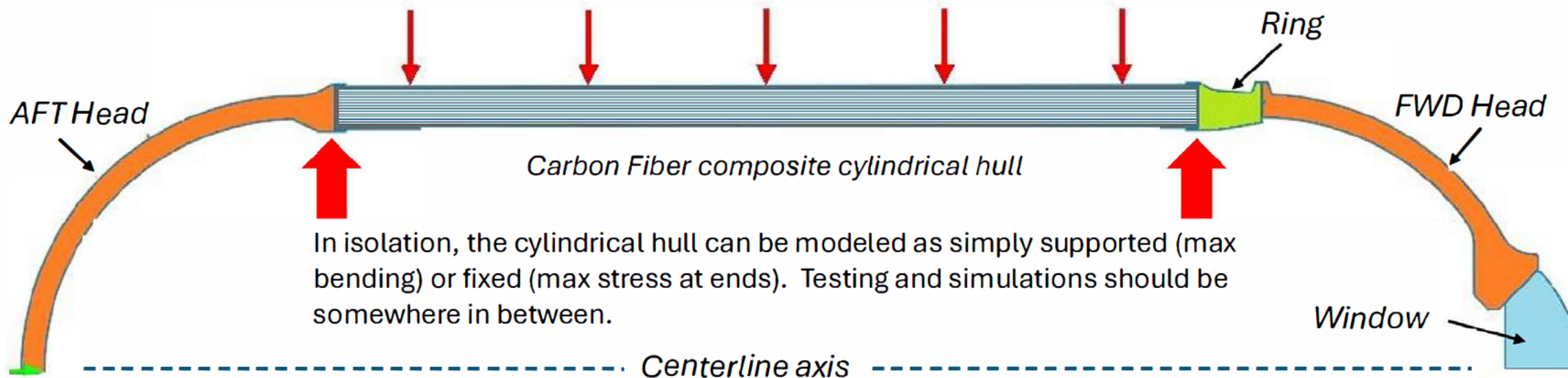
Stony Brook, New York 11794, USA

\* Corresponding author. E-mail address:

### ABSTRACT

Carbon fiber reinforced polymer (CFRP) composites are increasingly used in civil, naval, aerospace, and wind energy applications, where they can be frequently exposed to harsh temperature conditions and under static and dynamic loads. The extreme temperature conditions and dynamic loading are critical for CFRP composites structural design as the constituent polymer properties are highly sensitive to temperature and strain rate. This work experimentally investigates the effect of temperature, ranging from  $-100^\circ\text{C}$  to  $100^\circ\text{C}$ , on the mechanical properties of CFRP composites under static and dynamic three-point bending tests. The results reveal that CFRP composites provide enhanced flexural strength, maximum deflection, and energy absorption at lower temperatures ( $-60^\circ\text{C}$ ,  $-100^\circ\text{C}$ ) while relatively poor performance at a higher temperature ( $100^\circ\text{C}$ ). Experimental images from the post-mortem photographs, scanning electron microscopy, and high speed videos are implemented to observe various failure behaviors including microbuckling, kinking, and fiber breakage at different temperatures. Analytical modeling is further applied to reveal the underlying mechanisms responsible for these temperature dependent mechanical behaviors.

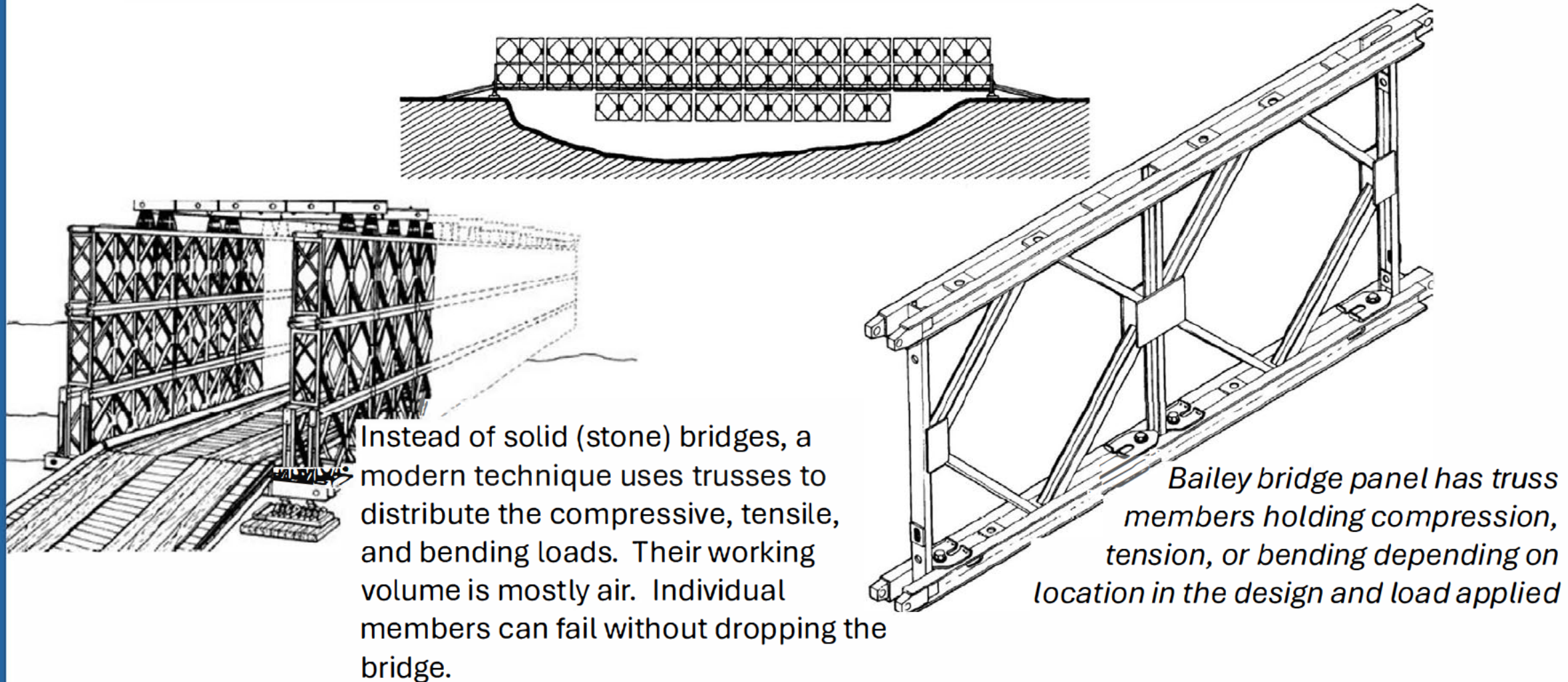
# Carbon Fiber – Load bearing members



Carbon fiber is an emerging technology with respect to external pressure applications. As a code, it is covered in Section X, ASME Boiler and Pressure Vessel Code. External pressure is limited to vacuum (100 kPA, 15 psig). Outside of code limits, it requires detailed engineering and testing (ie, VVUQ).



# Carbon Fiber – Load bearing members





# Carbon Fiber – Load bearing members



*Single panel wide, Single panel high*



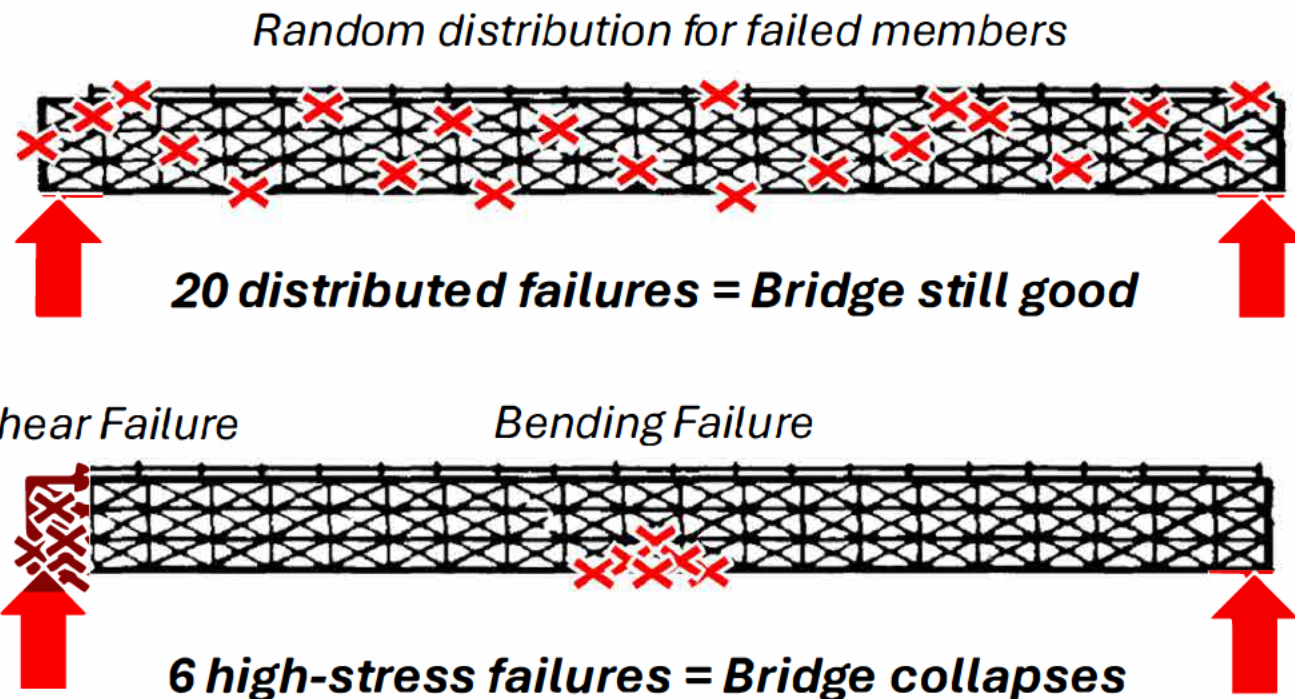
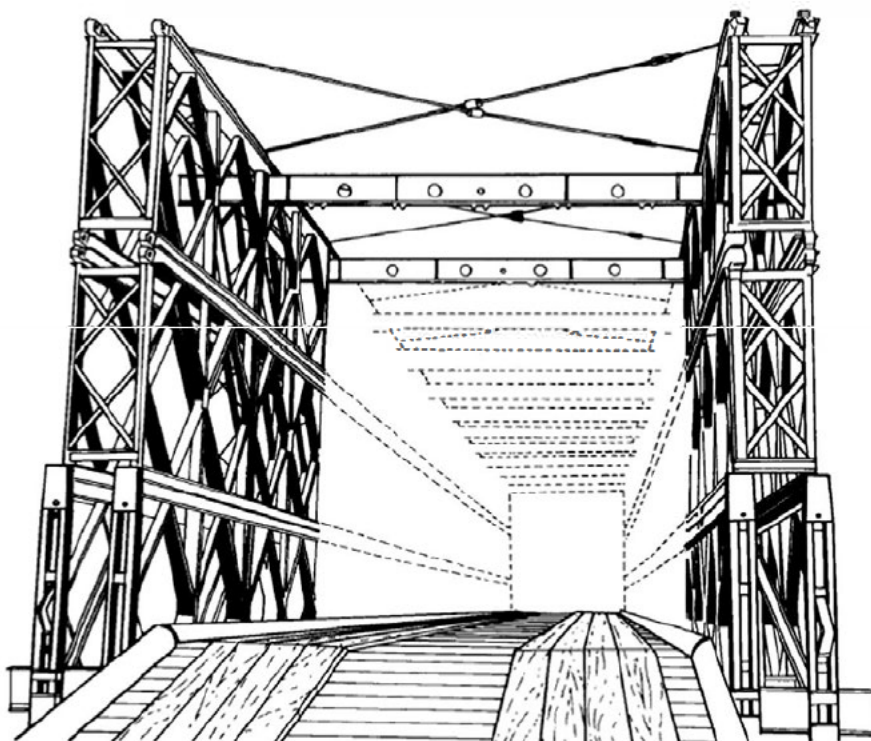
*Double panel wide,  
Single panel high*

*Double panel wide,  
Double panel high*

How many panels thick and high depends on the intended load and span length. It's not a question of the strength of the panel, **it's the design for the application.**

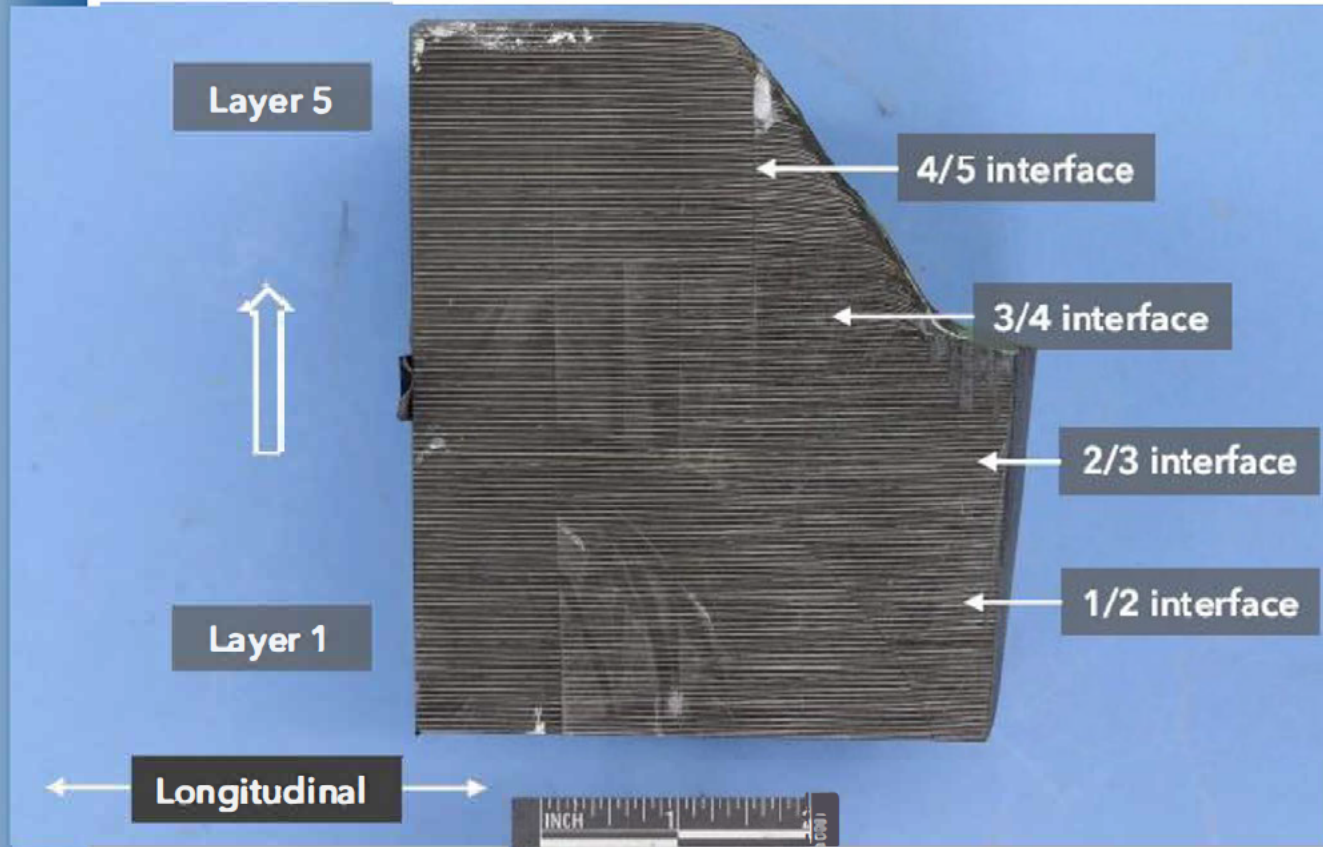


# Carbon Fiber – Load bearing members

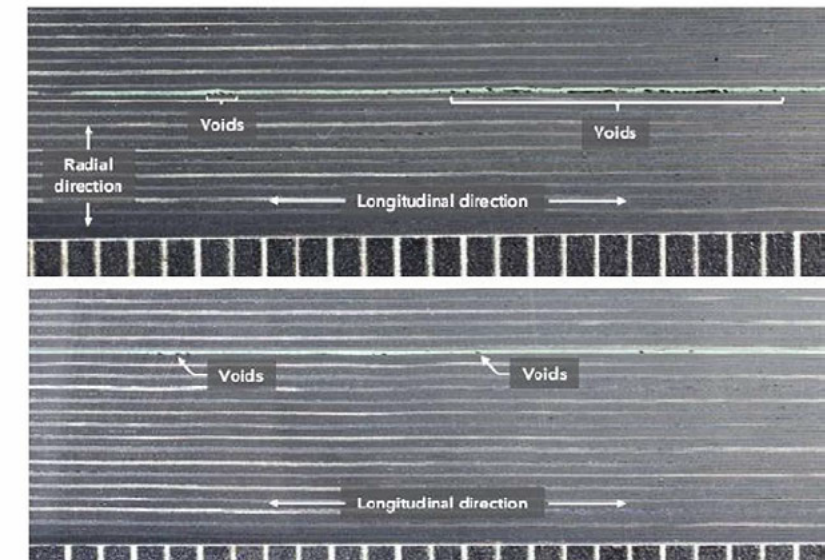
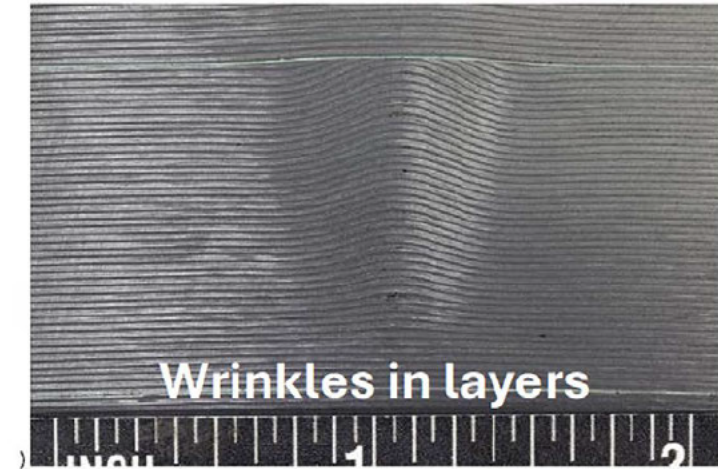


In order to count the number of “breaks” to predict failure, **where** the breaks will occur under load and **how many** are needed to create failure must be determined. Usage tends to bias “breaks” to locations consistent with structural failure modes.

# Carbon Fiber design, issues (see NTSB)



Cross section of the full thickness



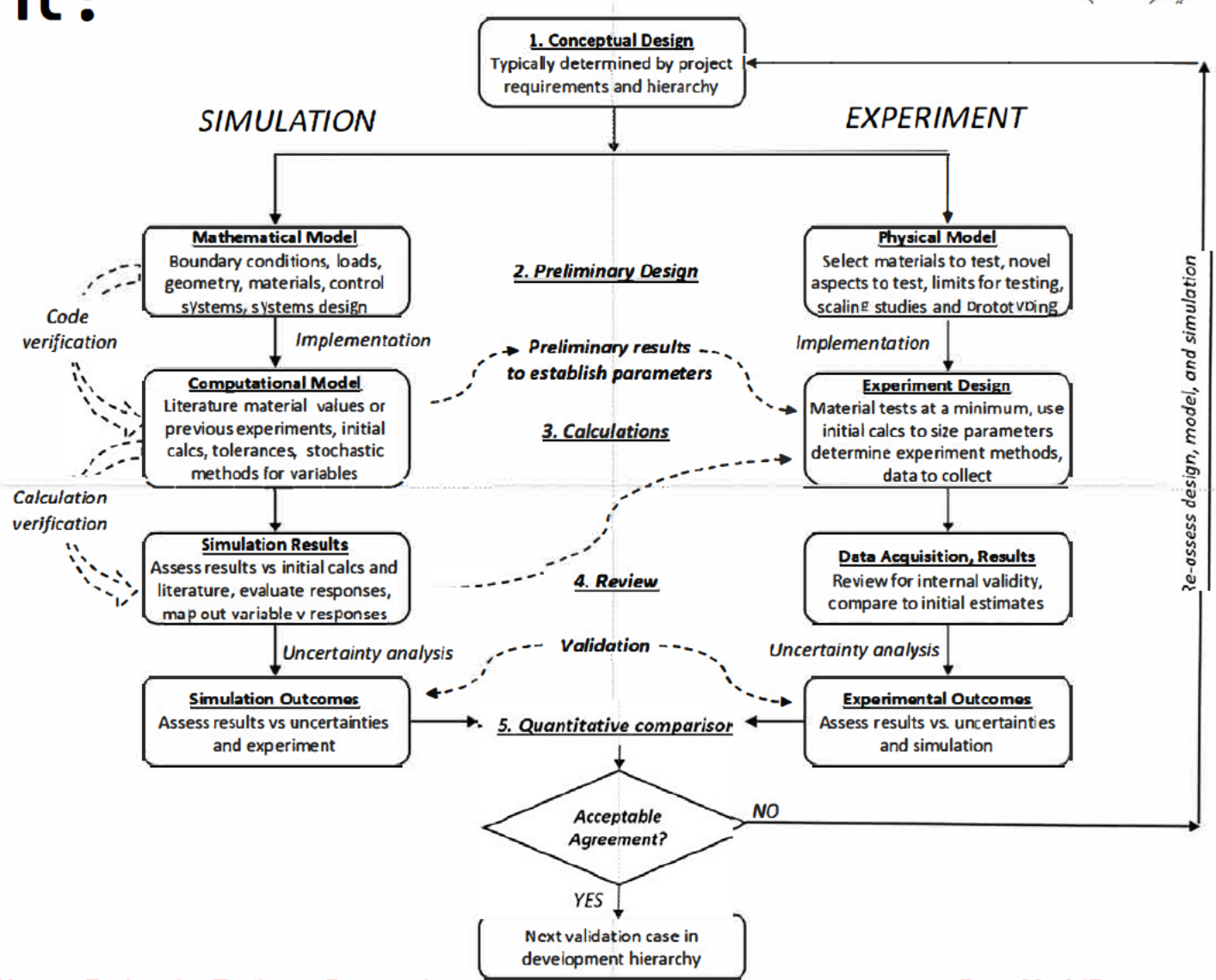


# VVUQ: What is it?

Verification, Validation, and Uncertainty Quantification (VVUQ) is a systematic approach applied to any industry engaged in **innovation with significant risk to people** or financial risk in order to **reduce and manage risk in a transparent, accountable manner**.

A significant aspect is **documenting requirements, predictions, measured results, and methods** in order to maximize the potential to be informed by the process while doing what no one has done before. **No “cookbook.”**

Example: **FDA requires VVUQ** for software in medical devices as well if simulations are used in design.





# ASME VVUQ Codes & Stds

## ASME V&V COMMITTEE Verification and Validation in Computational Modeling and Simulation

### STANDARDS COMMITTEE PERSONNEL

Air Force Research Laboratory  
Zimmer Biomet  
Los Alamos National Laboratory  
Sandia National Laboratories  
Southwest Research Institute  
Texas A&M University  
ANSYS, Inc.  
The American Society of Mechanical Engineers

U.S. Nuclear Regulatory Commission  
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Consultant  
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### V&V 10 SUBCOMMITTEE — VERIFICATION AND VALIDATION IN COMPUTATIONAL SOLID MECHANICS

Chair, Federal Aviation Agency  
Vice Chair, U.S. Army Corps of Engineers, Engineer Research and Development Center  
Secretary, The American Society of Mechanical Engineers  
National Nuclear Security Administration  
The Pennsylvania State University  
Air Force Research Laboratory  
Los Alamos National Laboratory  
Lawrence Livermore National Laboratory  
Kinectrics  
Sandia National Laboratories  
Pratt & Whitney  
Lawrence Livermore National Laboratory Consulting  
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Alternate, Sandia National Laboratories  
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VVUQ started in the 1970's. The VVUQ standards began early 2000's. They are not "cookbooks," but peer reviewed guidance based on best practices to instruct users in developing their own VVUQ program.

***ASME members: National laboratories, Biomedical, Aerospace, Power, Automotive, Defense – VVUQ is used in any industry.***

VVUQ 10 – Computational Solid Mechanics

VVUQ 20– Comp. Fluid Dynamics & Heat Transfer

VVUQ 30 – Nuclear System Thermal Fluids Behavior

VVUQ 40 – Comp. Modeling of Medical Devices

VVUQ 50 – Advanced Manufacturing

VVUQ 60 – Energy Systems

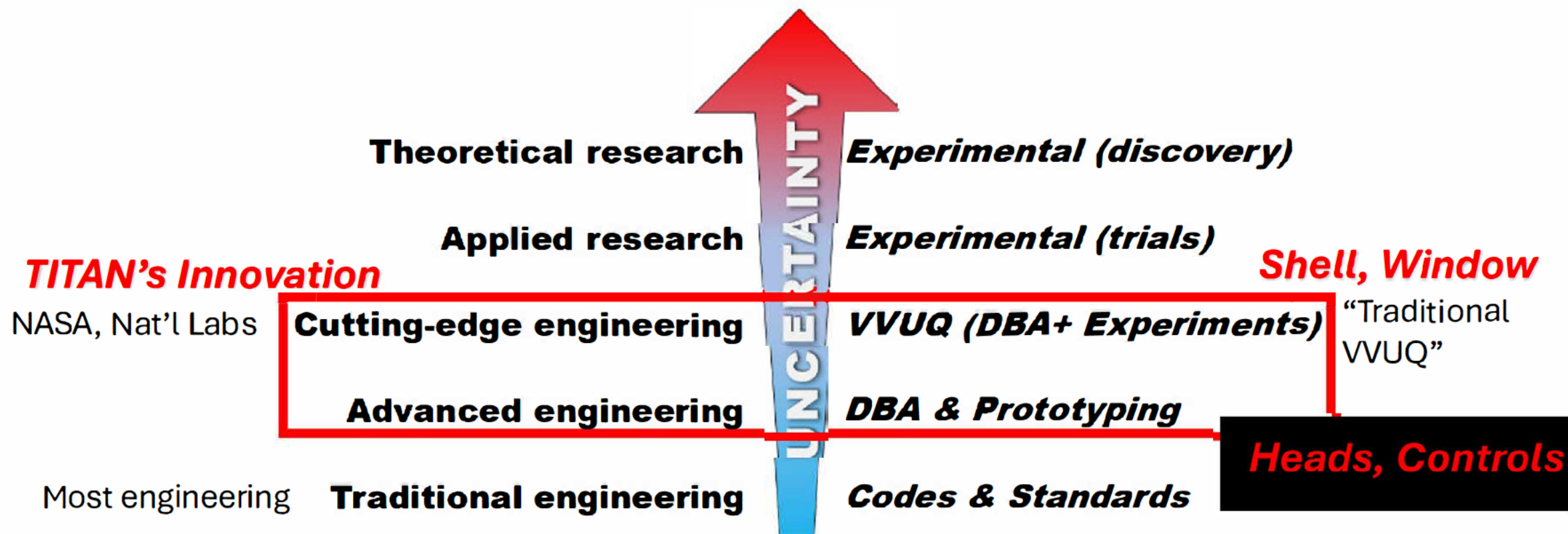
VVUQ 70 – AI and Machine Learning

VVUQ 80 – Pharmaceutical Products (*new*)

VVUQ 90 – Airframe Structures (*new*)

Other VVUQ methods such as NASA, DoD, etc.

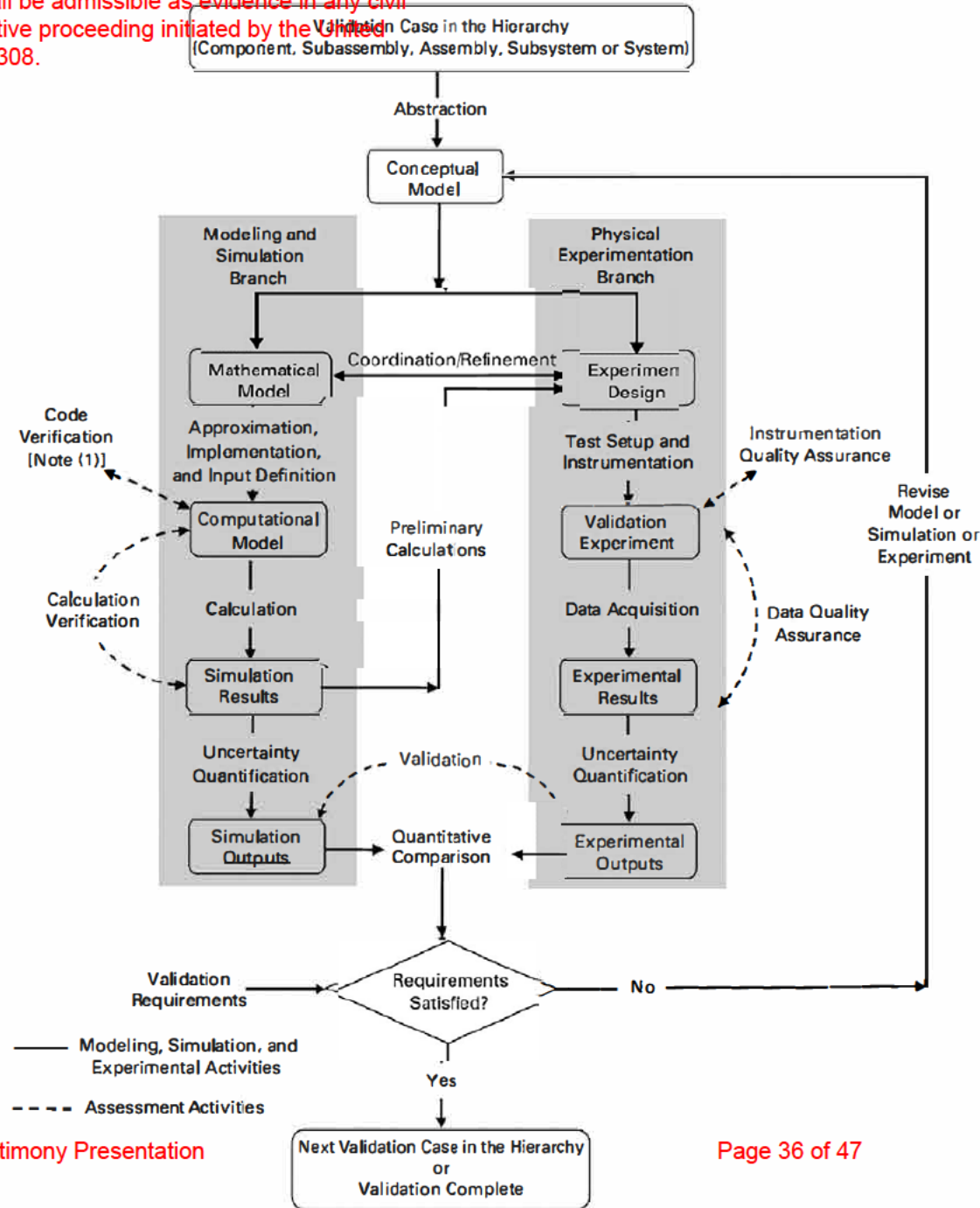
# VVUQ Spectrum



As a field becomes more established and codified, the VVUQ is "baked in" the codes & standards. "Cookbook engineering" has **design margins to reduce uncertainty and risk**.

# Traditional VVUQ

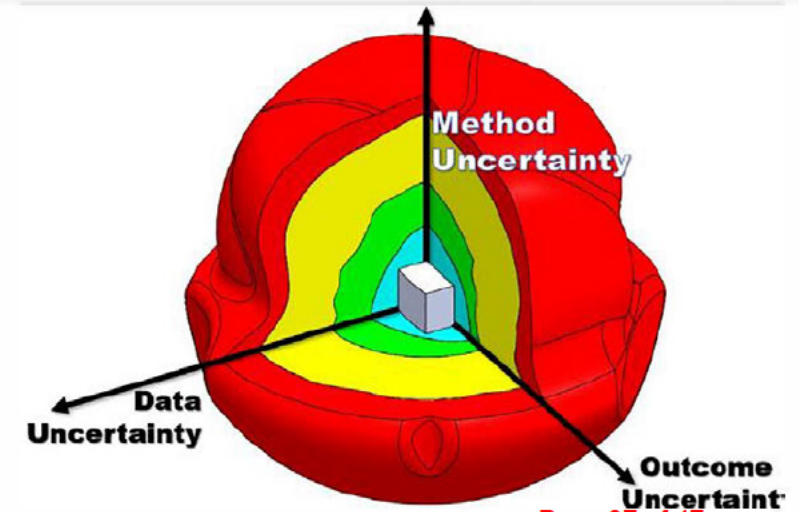
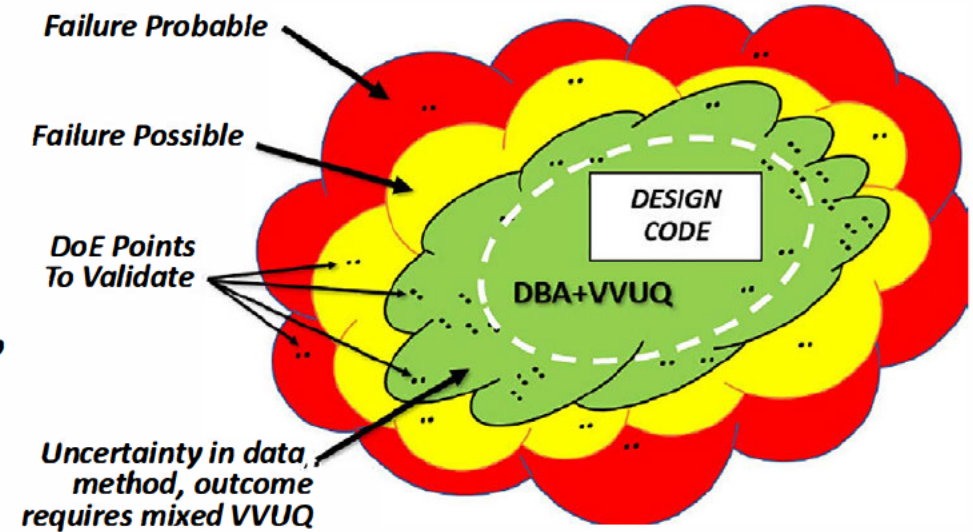
- Nondeterministic (multiple design factors over range of values)
- Requires methodical use of experiments, theory, and simulation
- ID's irreducible v reducible uncertainty
- **Intended to inform managers of risks in project to assess time/resources**
- Often for **high consequence** or **extraordinary novelty**
- Detailed, time consuming, and therefore **expensive**. Normal engineering is “cookbook” and much less expensive.





# “Engineer”/Deterministic VVUQ

- **No longer in the “cookbook” box.**
- Still in a well-understood domain or the consequences are not “zero failure,” as supported by FMEA, so not “traditional VVUQ”
- Many codes and groups have “design by analysis”, including ASME and USCG
- Often solving for single set of design factors
- More VVUQ the less the code provides:
  - guidance for using computer models/sims
  - guidance on material data
  - guidance on load combination
  - guidance for failure criteria



# VVUQ and the Pressure Vessel Code

**“Cookbook” design** is well-defined white box

ASME BPVC Section VIII, Div. 2, Part 5, “*Design By Analysis*” (also API 579/ASME FFS1)

**Complete system specified** (blue oval)

Types of FEM analyses permitted

Material properties, curves at temp

Service condition (corrosion, fatigue, etc.)

Load combinations for different analyses

NDT, system testing requirements

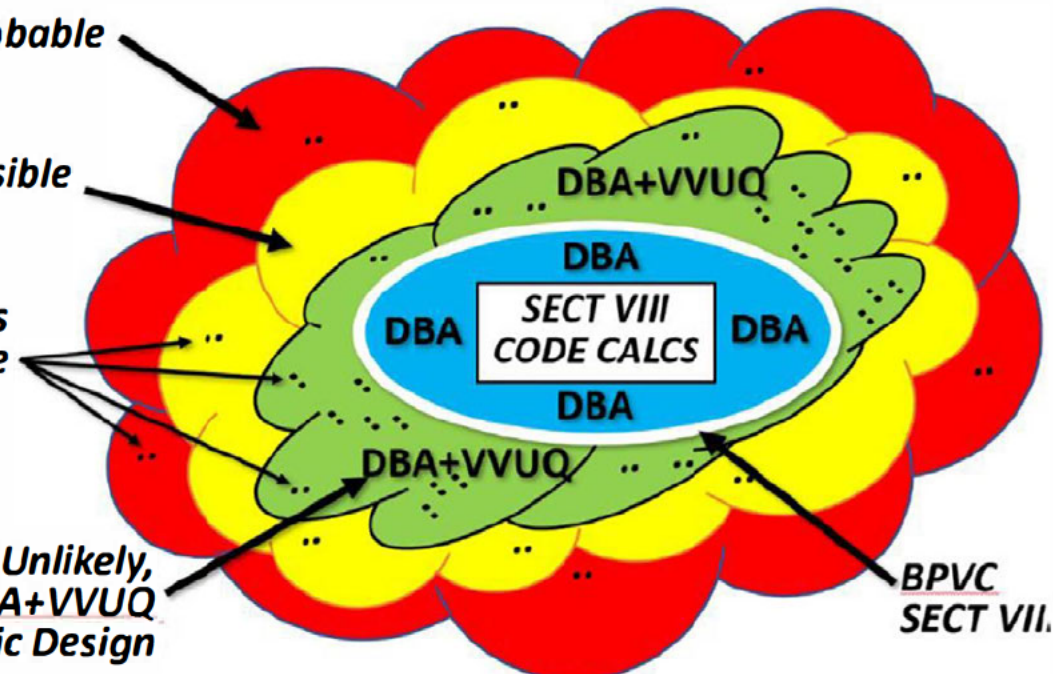
**Within limits of Part 5**, solution verification is still highly prudent and is good practice, not required. Outside the limits, VVUQ is needed.

**Failure Probable**

**Failure Possible**

**DoE Points  
To Validate**

**Failure Unlikely,  
Use DBA+VVUQ  
For Specific Design**

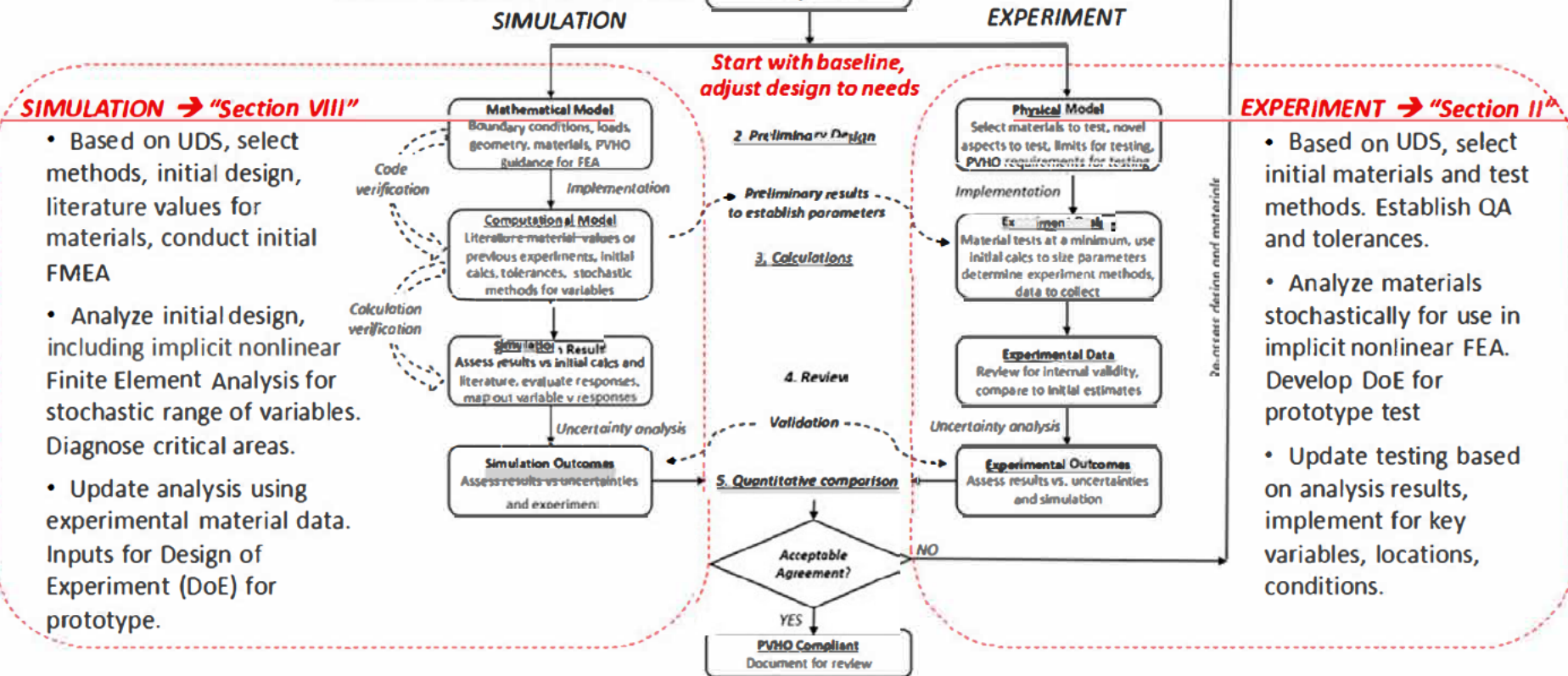




# WVUQ drives windows DBA method

## Design By Analysis Framework using PVHO-1, BPVC, V&V10

**START: User Design Specification (UDS),  
Risk Assessment with FMEA**





# Why OceanGate needed VVUQ

- **High risk** to people and organization regarding first mode failures
- **New materials** (specific composition of carbon fiber composite)
- **Novel applications** (non-spherical external pressure shell, novel window)
- **Novel systems integration** of new items and “off the shelf” items

DESIGN → PREDICT → TEST → MEASURE → ANALYZE → REDESIGN ↶

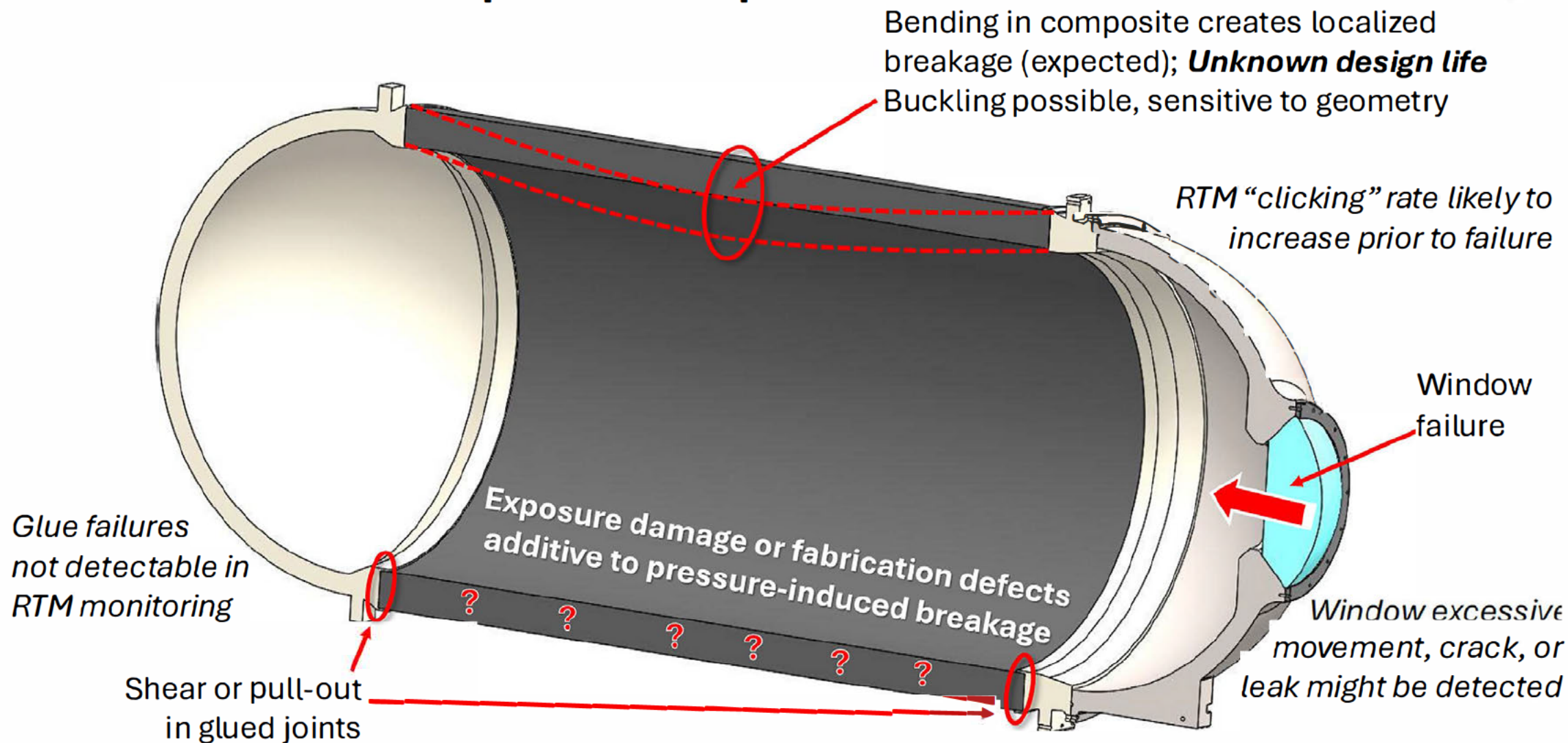
- ☑ Minimize novelty within design cycle to minimize VVUQ needed
- ☑ Documentation to maximize value of simulations & tests
- ☑ VVUQ as “standard of care” for ethical engineering practice when codes and standards are not available to define what “what right looks like” from experience

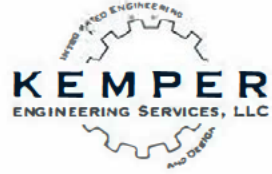
# Potential Implosion points

- **Indeterminate** at this time
- **Multiple unmitigated single-mode failure** paths, overlapping uncertainty based on data available precludes definitive causation
- **Unknown design life**. It may have had a short life (no defect impact)
- Possible initiation cause(s):
  - Internal localized failure due to **cumulative carbon fiber breakage** (end of life without any shortcomings)
  - Internal localized failure of the composite hull **due to fabrication**
  - Internal localized failure due to **damage from exposure**
  - Shear failure along **glue line** between hull and ring
  - Failure of the **acrylic window**



# Potential Implosion points

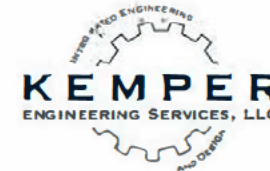




# Kemper Engineering Recommendations

- Require **experimental craft** to be limited to an operator and assistant, with no passengers or cargo. Require inspections for suitability for the proposed usage, including tests.
- **Require min. level** of navigation aids, emergency gear, and a standardized lifting point for extraction via ROV attaching a cable
- **Require ASME PVHO-1** for all submarines made or operated in the US. Deviations allowed with justification (ie, “addressed by class.”)
- **Require a licensed Professional Engineer** to be part of the engineering team. They do not have to be the head engineer, but they provide code-required attestations such as the Manufacturer’s Data Report, review design calculations, etc.





Testimony of  
[REDACTED] P.E., DFE

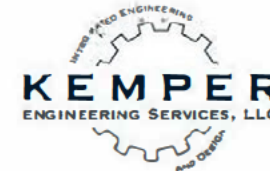
***Summary of preliminary findings  
regarding OceanGate and loss the  
Titan Submersible***

Kemper Engineering Services  
Baton Rouge, LA

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