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NVIC 3-88, Change-1
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NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 3-88, CHANGE 1

Subj: CH-1 TO NVIC 3-88, ISSUANCE OF LETTERS OF COMPLIANCE TO FOREIGN DOCUMENTED MOBILE OFFSHORE DRILLING UNITS OPERATING ON THE OUTER CONTINENTAL SHELF OF THE UNITED STATES.

1. **PURPOSE**. This Circular revises Navigation and Inspection Circular (NVIC) No. 3-88 to update information pertaining to Enclosure (1) and Attachment (3) to Enclosure (1), the CROSS REFERENCE OF REGULATIONS PERTAINING TO U.S. AND FOREIGN FLAG MODUs.

2. **ACTION**.

   a. Owners and operators or their representatives for foreign flagged MODUs operating and intending to operate on the U.S. outer continental shelf (OCS) should familiarize themselves with the provisions of this Circular.

   b. Coast Guard marine inspectors will refer to the enclosed guidance when conducting Letter Of Compliance examinations of foreign flagged MODUs operating or seeking to operate on the U.S. OCS.

   c. Officers in-Charge, Marine Inspection (OCMI), shall bring the enclosed guidance to the attention of appropriate individuals in the marine industry within their zones.

3. **DISCUSSION**. NVIC 3-88 provides guidance and information on the inspection of foreign flagged MODUs operating on the U.S. Outer Continental Shelf. Since the original publishing of the subject NVIC, the Code for the Construction and Equipment of Mobile Offshore Drilling Units, 1989 with 1991 amendments have come into affect and Subchapter I-A has been revised. This change reflects an updated comparison of all applicable regulations and standards including the 1989 Code with amendments.

4. **IMPLEMENTATION**. Make the following change to the subject NVIC:

   a. Remove original GUIDE FOR ISSUANCE OF A LETTER OF COMPLIANCE TO FOREIGN FLAGGED MOBILE OFFSHORE DRILLING UNITS OPERATING ON U.S. OUTER CONTINENTAL SHELF, pages 1 through 10 and replace with pages 1 through 10.

   b. Remove original pages 1 through 12 of attachment 3 to Enclosure (1) and insert pages 1 through 8 of attachment 3 to Enclosure (1), Change-1.

Encl: (1) Navigation and Vessel Inspection Circular 3-88, Change-1 Enclosure (1) pages 1-10 and Attachment 3 to Enclosure (1) pages 1-8

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GUIDE FOR ISSUANCE OF A LETTER OF COMPLIANCE TO FOREIGN FLAGGED MOBILE OFFSHORE DRILLING UNITS OPERATING ON U.S. OUTER CONTINENTAL SHELF

1. APPLICATION. The guidelines contained in this document amplify the regulations contained in 33 CFR, Parts 140 through 146, Subchapter N, which require each mobile drilling unit (MODU) documented under the laws of a foreign nation obtain a Letter of Compliance (LOC) from the U.S. Coast Guard prior to engaging in Outer Continental Shelf (OCS) activities. This enclosure is intended to clarify the regulations and assist in their uniform application. Attachment (3) of this enclosure provides a matrix for comparison of U.S. regulations to the 1979 and 1989 International Maritime Organization MODU CODES.

2. ADMINISTRATION.

   A. Request for a Letter of Compliance Inspection. The owner of a foreign flagged MODU should contact the Officer in Charge, Marine Inspection (OCMI), in whose zone the unit will operate, to request an LOC inspection. The LOC inspection must be completed to the satisfaction of the Coast Guard and an LOC must be issued prior to engaging in OCS activities. All documents submitted to the Coast Guard must be accompanied by an English translation if the originals are in a foreign language. An example of an LOC pre-inspection information sheet is included as attachment (1) to this enclosure and may be used to provide vessel data when requesting and scheduling an LOC inspection. The OCMI shall not schedule or conduct an LOC inspection until the owner/operator of the foreign MODU has paid the user fee in full.

   B. Issuance of a Letter of Compliance.

      1. The regulations in 33 CFR 143.207 specify the following three options under which an LOC may be obtained. For the purposes of this Circular, they will be referred to as Options A, B, and C to correspond with the respective paragraphs of 33 CFR 143.207. At the time of application for an LOC, the owner must specify which of the following inspection options is desired for the unit.

         a. Option A - The MODU is constructed to meet design and equipment standards of 46 CFR Part 108.

         b. Option B - The MODU is constructed to meet the design and equipment of the documenting nation if the standards provide a level of safety generally equivalent to or greater than that provided under 46 CFR Part 108.

         c. Option C - The MODU is constructed to meet the design and equipment standards for MODUs contained in the International Maritime Organization (IMO) Code for the construction and equipment of MODUs.

      2. Owners of units documented under the laws of nations which do not have MODU standards and have not adopted the IMO MODU Code may only be inspected and receive an LOC under Option A.

      3. When the OCMI has determined that the unit is in compliance with one of the options under 33 CFR 143.207 and the operating requirements for a foreign MODUs contained in 33 CFR 146.205, the unit will be issued an LOC. The LOC is valid for a period of 1 year or until the

unit departs the U.S. OCS, whichever occurs first. The LOC will be in letter form and similar to attachment (2) to this enclosure. The LOC will specify the maximum number of persons permitted aboard the unit and the minimum number of lifeboatmen required. The LOC is to be placed aboard the unit and be readily available to Coast Guard personnel.

4. The LOC may be issued with certain outstanding discrepancies permitted at the discretion of the cognizant OCMI. The discrepancies will be noted on a letter attachment of the LOC and indicate what the OCMI deems to be a reasonable period for correction. The LOC will not be issued with uncorrected discrepancies involving fire fighting or lifesaving equipment. Discrepancies left uncorrected from an initial LOC inspection will be cause for denial of subsequent LOCs.

C. Load Line Certificate. Each MODU documented in a country signatory to the 1966 International Convention on Load Lines (ICLL) shall have a valid ICLL Certificate. If the MODU does not have a valid ICLL certificate or is documented under the laws of a nation not signatory to the 1966 convention, then the owner must apply for and obtain a "Form B" certificate in accordance with the provisions of 46 CFR Part 42. Owners/operators should be cognizant of the survey requirements to obtain and maintain a load line. Unclassed units built prior to 1969 will not be required to obtain a load line, but they are required to receive a freeboard assignment. Application for freeboard assignment can be addressed to the Coast Guard Marine Safety Center (MSC).

D. U.S. Territorial Sea/Contiguous Zone Restrictions. The LOC permits operation of a unit only upon the U.S. OCS. Units entering the U.S. contiguous zone or territorial sea must be in compliance with applicable pollution prevention regulations (33 CFR Parts 155 and 156), marine sanitation device regulations (33 CFR Part 159), navigation safety regulations (33 CFR 164) and the requirements for financial responsibility for water pollution (33 CFR 130). Units not in compliance with these regulations are prohibited from entry into these areas and such restrictions shall be noted on the LOC.

E. Financial Responsibility for Oil Pollution. Prior to issuance of the LOC, the owner/operator of each foreign flagged MODU must obtain the appropriate vessel and offshore facility Certificates of Financial Responsibility issued under the provisions of 33 CFR, Parts 130 and 135.

F. Prevention of Oil Pollution/IOPP Compliance. All units must comply with the applicable provisions of 33 CFR Parts 151 and 155 for the prevention of oil pollution. All ocean going units 400 gross tons and above must comply with the equipment requirements for equipment and International Oil Pollution Prevention (IOPP) certification (MARPOL 73/78).

G. Discharges of Pollutants from OCS Facilities. When engaged in drilling operations, each unit must have a valid National Pollution Discharge Elimination System (NPDES) Permit required by 40 CFR 125.120.

3. SPECIFIC REQUIREMENTS PERTAINING TO OPTIONS A, B, AND C PRESCRIBED UNDER 33 CFR 143.207.

A. Definitions. For the purposes of this enclosure:

1. An existing MODU for the purposes of implementing IMO MODU CODE 1979 is defined as a unit documented under the laws of a foreign nation that was built, contracted for, or under

construction prior to April 5, 1982.

2. An existing MODU for the purposes of implementing IMO MODU CODE 1989 is defined as a unit documented under the laws of a foreign nation that was built, contracted for, or under construction after May 1, 1991.

3. A new MODU is defined as a unit documented under the laws of a foreign nation that is not considered an existing unit.

B. Units Applying for an LOC under Option A.

1. *New MODUs* - All new units will be inspected for full compliance with the design and equipment requirements of 46 CFR, Part 108. Each unit will also comply with the operating requirements of 46 CFR Part 109 as specified by 33 CFR 146.203.

2. *Existing MODUs* - All existing units will be inspected as in the above paragraph. However, units in service, contracted for or under construction prior to April 4, 1982 are required to comply with the design requirements of Appendix A of 46 CFR 109 until the unit is rebuilt. After a rebuild, the unit must meet the requirements of 46 CFR Parts 107 - 109, Subchapter I-A titled Mobile Offshore Drilling Units. The definition for ***REBUILT*** can be found in 33 CFR 140.10.

3. *Acceptance of Foreign Equipment* - Foreign equipment may be accepted by the OCMI in accordance with Part 8 of this enclosure.

C. Units Applying for an LOC Under Option B. The owners of a new or existing MODU seeking an LOC under this option should ascertain whether the flag state's MODU standards has received a statement of equivalency from Commandant U.S. Coast Guard. The flag state's MODU standards are compared against Coast Guard inspection standards and the equivalency is granted when it is determined the flag state's standards provide a level of safety that is generally equal to those of the U.S. MODUs. If not, the flag state must submit its MODU standards to Commandant (G-MOC) for review and approval. This submittal should be made at least six months prior to commencing an LOC inspection under this option. The units must meet the operating requirements specified in 33 CFR 146.205(b). Until the Coast Guard has determined that the standards of the flag state are generally equivalent to those of the U.S., a foreign flagged MODU may not obtain an LOC under this option. Questions concerning acceptance of equivalencies should be addressed to Commandant (G-MOC).

D. Units Applying for an LOC Under Option C. The owner of a new or existing unit should present the cognizant OCMI with a valid, full compliance IMO MODU Code Certificate issued by the flag state or agent authorized by the documenting nation to act in its behalf. Certificates with exemptions or exceptions will be reviewed by the OCMI to ensure the spirit of the Code has been met. Units must meet the operating requirements specified by 33 CFR 146.205(c).

4. SCOPE OF INSPECTIONS. To establish uniformity in extent, scope and detail of LOC inspections, owners, operators and OCMIs should be aware of the following guidelines for performing inspections under the three available options.

A. Units Applying for an LOC under Option A. Coast Guard personnel will perform inspections of foreign MODUs to ensure compliance with 46 CFR Parts 108 and 109 to the same extent as would be performed on a U.S. documented MODU. Owners/operators are advised that Coast Guard inspectors will require the tests and inspections specified by 46 CFR 107.231 to determine if the unit complies with Subchapter I-A.

B. Units Applying for an LOC Under Option B. Prior to conducting the inspection, Coast Guard marine inspectors shall ensure the flag state has received an equivalency determination from Commandant (G-MOC). Prior to issuance of the LOC, Coast Guard inspectors shall conduct an examination of the unit ensuring it meets the MODU standards of the flag state. Any indication that the unit is not being maintained to the flag state's standards or apparent discrepancies between the flag state's standards and Subchapter I-A shall be bought to the attention of Commandant (G-MOC) for resolution of any conflicts prior to issuing an LOC.

C. Units Applying for an LOC Under Option C. Prior to issuing an LOC, Coast Guard inspectors will ensure that the unit and its equipment are being maintained to the standards of the applicable IMO MODU Code. The unit must possess a valid IMO MODU Code Certificate issued by the flag state. Other required documents will be examined to determine they are valid. The OCMI should report any discrepancies which may preclude issuance of an LOC under this option to Commandant (G-MOC). Minor equivalencies noted on IMO MODU Code Certificate may be accepted by (G-MOC) on a case by case basis.

5. SOLAS CERTIFICATES. The Coast Guard recognizes SOLAS certificates only for matters covered by these certificates. Self-propelled units over 500 gross tons are required to have the following valid SOLAS certificates:

   A. Safety Construction
   B. Safety Equipment
   C. Radiotelephony or Radiotelegraphy (if applicable)

   A valid, full compliance IMO MODU Code Certificate will be acceptable in lieu of the required SOLAS certificates for those matters covered by the MODU Code. In no case will a non-full compliance MODU Code Certificate be accepted as an adequate substitute for the required SOLAS certificates.

6. STABILITY. A Load Line Certificate is not sufficient to verify adequate stability of the unit. Acceptance of stability will be based on one of the following criteria:

   A. Review and approval of the stability calculations and data contained in the operating manual by the Marine Safety Center to the standards contained in 46 CFR, Parts 170 and 174.

   B. Examination of stability data contained in the operating manual accepted under full IMO MODU Code standards by the flag state. In cases when a unit's stability has been determined under less than full IMO criteria, a stability test may be required to verify lightship data. Owners and operators are advised that an operating manual not containing supporting calculations and inclining experiment/deadweight survey data, submitted to the Coast Guard for approval will be determined to be inadequate.

C. Examination of alternative stability criteria accepted by the flag state that provides an equivalent level of safety as permitted by Section 3.3.3 of the IMO MODU Code.

7. GENERAL SAFETY REQUIREMENTS. All foreign flagged MODUs shall comply with the following provisions as applicable:

A. Workplace Safety. Owners and operators of all foreign flagged MODUs operating on the U.S. OCS are responsible for maintaining those units in compliance with workplace safety and health regulations and free from recognized hazards as specified in 33 CFR, Part 142.

B. Drydock Examination/Special Examination in Lieu of Drydocking. In order to verify the unit's structural integrity and continued compliance with the design standards specified by 33 CFR 143.201 and .207, all MODUs should undergo a drydock or special examination at the following intervals:

1. *Units applying for an LOC under Option A* - Units are to comply with the requirements specified for USCG certificated units in 46 CFR 107.261. Documentation of recent drydock examinations or special exams in lieu of drydocking witnessed by Coast Guard recognized classification societies may be accepted.

2. *Units applying for an LOC under Option B* - Units must comply with the requirements of the flag state which have been determined by Commandant (G-MOC) to provide a level of safety equivalent to those provided by U.S. requirements. Unit owners must present evidence to the satisfaction of the cognizant OCMI that a drydock examination or a special exam in lieu of drydock was conducted in accordance with the flag state's standards as accepted by Commandant (G-MOC).

3. *Units applying for an LOC under Option C* - Evidence of full compliance with the provisions of the IMO MODU Code pertaining to all required surveys must be presented to and accepted by the cognizant OCMI.

4. The Coast Guard will not normally conduct drydock examinations or special examinations in lieu of drydocking on foreign units. However, if the unit's structural integrity is in question, the cognizant OCMI may require an examination to be conducted by the flag state with Coast Guard inspectors in attendance.

C. Cranes. All pedestal mounted revolving cranes must be in compliance with the design requirements and operating standards as outlined below:

1. *Units applying for an LOC under Option A* - Cranes aboard units are to be inspected, tested and operated in compliance with the requirements contained in 46 CFR Parts 107, 108 and 109.

2. *Units applying for an LOC under Option B* - The cranes may be inspected, tested and operated in accordance with the flag state's standards for cranes if those standards are determined by Commandant (G-MOC) to provide a level of safety generally equivalent to or greater than that provided in 46 CFR Parts 107, 108 and 109.

3. *Units applying for an LOC under Option C* - The cranes should be inspected, tested and operated in accordance with Chapter 12 of the IMO MODU Code. The unit owners should present evidence that the cranes have been examined and accepted by the flag state or its authorized representative within 12 months of the date of application for an LOC.

4. All crane testing and inspection should be witnessed and conducted by the American Bureau of Shipping (ABS), Det Norske Veritas (DNV), or the International Cargo Gear Bureau, Inc. (ICGB) for cranes under certification by these organizations and for cranes on units undergoing LOC inspections under Option A; or, for units undergoing an LOC inspection under Option B or C, a recognized classification society or other authority designated by the flag state to conduct such testing and inspection of cranes.

D. Pressure Vessels. *All Options* - All fired and unfired pressure vessels should be designed, fabricated, and identified in accordance with the requirements of the ASME Code, the Coast Guard, or other authority recognized by the flag state. Additionally, pressure vessels used for compressed air service (including those used in motion compensating, riser tensioning, and guide line tensioning systems), fired boilers, waste heat boilers, hot water heaters, thermal fluid heaters, and pressurized evaporators require periodic internal inspection and/or hydrostatic testing at the following intervals:

1. *Option A* - At the time of the initial LOC and every 24 months thereafter.

2. *Option B* - Within 12 months previous to the date of application of the LOC and again so that the intervals do not exceed 24 months.

3. *Option C* - At the interval specified by the flag state but not exceeding 30 months prior to the date of application for the LOC.

With respect to Options B and C above, unit owners must present sufficient documentation demonstrating such inspections and tests have been conducted and witnessed by authorized representatives within the specified intervals. If satisfactory evidence of prior inspection of the pressure vessels is not available, they will be made ready for inspection and/or tested to the satisfaction of the cognizant OCMI prior to issuance of the LOC. Additionally, each pressure vessel must have a relieving device set in accordance with the provisions of 46 CFR 54.15-5(c). Relief devices should be ASME Code stamped or built to an equivalent standard recognized by the flag state. The relieving devices are to be examined and tested at each inspection for the issuance of an LOC.

E. Lifesaving Appliances. *All Options* - All units must be equipped with lifesaving appliances in accordance with 46 CFR 108.503 through .597, a standard that has been determined to be equivalent by Commandant (G-MOC), or the IMO MODU Code. All lifeboats on the units must be approved rigid, totally enclosed, propelled by motor, fire protected, davit launched survival craft constructed to comply with the provisions of SOLAS 74, Chapter III as amended, the IMO Lifesaving Appliances (LSA) Code, or have a USCG approval in the 160.135 series. All lifeboats must be equipped in accordance the provisions of the IMO LSA Code or the provisions of 46 CFR Table 108.575 (b). All liferafts must be constructed and approved in accordance with the provisions of SOLAS 74, Chapter III, as amended by the IMO Lifesaving Appliance Code, or have a USCG approval in the 160.118 or 160.151 series. Rigid life rafts must be equipped to the

SOLAS A or B standard, or to 46 CFR Table 108.575 (b). All units must provide life jackets in accordance with the IMO MODU Code or 46 CFR 108.580(b). The unit owners must present evidence acceptable to the cognizant OCMI that the lifesaving appliance launching devices were satisfactorily weight tested in accordance with the provisions of 46 CFR 109.301(i) within 12 months of the application for an LOC. Additional weight tests of these devices will be required in accordance with 46 CFR 109.301(i). All survival equipment locations shall be marked in accordance with SOLAS 74, Chapter III, Regulation 9. (NVIC 3-87 offers guidance for the types of placards.)

F. Carriage of Exposure Suits. *All Options* - Foreign units on the U.S. OCS operating north of 32N latitude shall carry immersion suits approved by the U.S. Coast Guard under approval series 160.171. Immersion suits approved by the unit's flag state may be used only if the suits are insulated buoyant immersion suits meeting SOLAS 74, Chapter III, or the IMO Lifesaving Appliance Code.

G. Fire Safety. *All Options* - All fire extinguishing systems, fire extinguishers, fire detection systems and sprinkler systems are to be inspected annually. In absence of adequate documentation that such testing has been made by the flag state or its authorized representatives, testing will be required by the Coast Guard to the satisfaction of the cognizant OCMI. On all units where wood was utilized in construction of the accommodation spaces, each space must be equipped with a smoke or heat detector satisfactory to the cognizant OCMI.

H. Alarms, Remote Controls, and Other Safety Devices. *All Options* - The satisfactory operation of installed machinery and switchboard safety devices, all remote closures and shutdowns, and all alarms should be demonstrated at each inspection/examination for issuance of an LOC.

I. Emergency Lighting Systems. *All Options* - An emergency lighting system capable of a minimum of 12 continuous hours of operation is to be installed in passageways, stairways, escape routes to lifesaving craft, galleys, pantries, emergency power rooms, mess rooms, recreation rooms, manned machinery spaces, and control rooms. Additional emergency lights should be installed to provide adequate illumination for the entire launching process of lifeboats/capsules and liferafts from the stowed position to the water. Relay controlled battery powered lanterns are acceptable for these purposes, and should be specifically required when a MODU is equipped with an emergency total rig shutdown system.

J. Helicopter Facilities. Helicopter facilities aboard all foreign MODUs are to meet one of the following standards including requirements for helicopter deck fire fighting equipment and helicopter fueling facilities:

1. *Option A* - The requirements of 46 CFR, Parts 108 and 109.

2. *Option B* - The requirements of the flag state if they provide a level of safety equivalent to or exceeding those specified by 46 CFR, Parts 108 and 109.

3. *Option C* - The requirements of the IMO MODU Code, Chapters 9 and 12

8. ACCEPTANCE OF FOREIGN EQUIPMENT. Where Coast Guard approved equipment is specifically required, foreign equipment may be accepted in accordance with the provisions of 33

CFR 140.15. The OCMI may require additional equipment as necessary to ensure that a general level of safety equivalent to 46 CFR, Parts 108 and 109 is maintained. Any equipment specifically prohibited on U.S. units will be prohibited on foreign units.

9. OPERATING MANUALS. All foreign units should have operating manuals complying with the applicable provisions specified in 33 CFR 146.205. Prior to the initial LOC, the operating manual is to be submitted to the cognizant OCMI for review. The contents of the manual must be in English in addition to any other language understood by personnel routinely aboard.

10. FOREIGN FLAGGED UNITS STACKED OR LAID-UP ON THE U.S. OCS, CONTIGUOUS ZONE, OR TERRITORIAL WATERS. Foreign flagged units stacked or laid-up on the U.S. OCS, or contiguous zone or in territorial waters must comply with all Coast Guard requirements applied to U.S. flag units when in this status. Owners and operators of foreign flagged units should contact the cognizant OCMI prior to stacking the unit in the aforementioned areas to discuss the applicable requirements. Owners and operators are further advised that should the units stack in U.S. state waters, they may be subject to additional requirements imposed by the cognizant state authorities.

11. CITIZENSHIP REQUREMENTS. Prior to commencing drilling operations on the U.S. OCS, the owner/operator of a foreign flagged MODU shall ensure that the citizenship requirements set forth in 33 CFR, Part 141, are met. Amplifying guidance for compliance with the aforementioned regulations is found in NVIC 7-84.

12. EMERGENCY EVACUATION PLAN. All foreign units should have an approved Emergency Evacuation Plan (EEP) complying with the applicable provisions specified in 33 CFR 146.210. Prior to the initial LOC, the EEP is to be submitted to the cognizant OCMI for review. The contents of the manual must be in English in addition to any other language understood by personnel routinely aboard.

13. LOC: FAILURE TO MEET REQUIREMENTS. If at any time the OCMI determines that the unit is not in compliance with the requirements for the purpose of obtaining an LOC, regardless of the Option chosen, the Coast Guard may:

    A. Withhold issuance of the original LOC until the requirements are met;

    B. Withhold issuance of a subsequent LOC until the requirements are met;

    C. Suspend an unexpired LOC after a reinspection is initiated due to crew complaint or casualty investigation until requirements are met;

    D. Revoke an unexpired LOC after reinspection if the unit operates without complying with Coast Guard orders to correct serious discrepancies or unlawful conditions; or

    E. Initiate civil penalty procedures against the owner, operator, and/or person-in-charge if violations of 33 CFR 142.1 or other deficiencies remain uncorrected after official notification is given and a reasonable time for corrections expires.

    In all instances where the LOC is revoked or withheld, the Minerals Management Service (MMS) will be notified by the Coast Guard.

ITEM	U.S.	79 MODU CODE	89 MODU CODE
HULL STRUCTURE Hull Structure/ watertight integrity	108.113 - .115	2.3 - 2.6, 3.6	2.3 - 2.6, 3.6
STRUCTURAL FIRE PROTECTION Structural fire protection	108.123 - .147	9.1 - 9.2	9.1 - 9.2
MEANS OF ESCAPE Means of escape	108.151 - .167	9.3	9.3
Additional means of abandonment	108.540	10.11.1.2	10.3.8
Stairways and ladders	108.159 - .160	*	*
Means of embarkation for lifeboat/liferaft	108.540	10.11.1, SOLAS 74 Chap. III, Reg 48	10.3.7 SOLAS 74 Chap. III, Reg 48
CLASSIFIED LOCATIONS Hazardous locations	108.170 - .177 111.105	6.1 - 6.7	6.1 - 6.7
VENTILATION Ventilation system	61.20-3 108.181 - .187 111.103	6.3 - 6.4	6.3 - 6.4
ACCOMMODATION SPACES Accommodation spaces	108.193 - .215	*	*
Accommodation spaces inspected	109.433	*	*
Hospital space	108.209	*	*
RAILS Rails and guards	58.01-20 108.217 - .223	10.10	*
HELICOPTER FACILITIES Heliport	108.233 - .241	13.1 - 13.3	13.1 - 13.3
Visual aids	108.241	13.4	13.4
Heliport fueling	108.237 - .239	9.11	9.11
Markings	108.653	13.4	13.4
FIRE EXTINGUISHING SYSTEMS Fire detection systems	108.404 - .413	9.7	9.7

* Indicates no equivalent International rule.

Unless otherwise indicated, all U.S. cites reference Title 46 of the Code of Federal Regulations (CFR).
Unless otherwise indicated, all International cites reference applicable sections of IMO MODU Codes.
All SOLAS 1974 cites are from the consolidated text incorporating the 1981 and 1983 amendments.

ITEM	U.S.	79 MODU CODE	89 MODU CODE
FIRE EXTINGUISHING SYSTEMS (cont)			
Fire main system and stations	108.419 - .427	9.4 SOLAS 74 Chap. II-2, Reg 4	9.4 SOLAS 74 Chap. II-2, Reg 4
Fixed extinguishing system	108.431	9.5 SOLAS 74 Chap. II-2, Reg 5	9.5 SOLAS 74 Chap. II-2, Reg 5
Pressure relief system for air/vapor type space with fixed CO2 system	108.457	*	*
Closures for spaces protected by fixed fire protection	108.455	9.10.1	9.10.1
Semi-portable extinguishers	108.491 - .496	*	*
Portable extinguishers	108.491 - .495	9.6 SOLAS 74 Chap. II-2, Reg 6	9.6 SOLAS 74 Chap. II-2, Reg 6
Fireman's outfits	108.497	9.9 SOLAS 74 Chap. II-2, Reg 17	9.9 SOLAS 74 Chap. II-2, Reg 17
Fire axes	108.499	*	*
LIFESAVING EQUIPMENT			
Lifeboats	108.520 108.525	10.1 SOLAS 74 Chap. III, Reg 44, 45, and 46	10.2 SOLAS 74 Chap. III, Reg 44, 45 and 46
Lifeboat equipment	108.575 Table 108.575 (b) 109.301 (f)	10.1.3 SOLAS 74 Chap. III, Reg 41	10.18.7 SOLAS 74 Chap. III, Reg 41
Lifeboat davit assembly	108.550 - .557 109.301 (f)	10.5 SOLAS 74 Chap. III, Reg 48	10.6 SOLAS 74 Chap. III, Reg 48
Lifeboat winches	108.550 109.301(f) 111.95	SOLAS 74 Chap. III, Reg 48	SOLAS 74 Chap. III, Reg 48
Lifeboat falls	108.553 109.301(j)	10.5 SOLAS 74 Chap. III, Reg 48	10.18.4 SOLAS 74 Chap. III, Reg 48

* Indicates no equivalent International rule.

ITEM	U.S.	79 MODU CODE	89 MODU CODE
LIFESAVING EQUIPMENT (cont)			
Lifeboat launching system	108.555 - .557	10.5 SOLAS 74 Chap. III, Reg 48	10.6 SOLAS 74 Chap. III, Reg 48
Inflatable liferafts	108.520 108.525	10.1 SOLAS 74 Chap. III, Reg 39	10.2 SOLAS 74 Chap. III, Reg 39
Inflatable liferaft launching system	108.530 108.550 - .553	10.5 SOLAS 74 Chap. III, Reg 48	10.6 SOLAS 74 Chap. III, Reg 48
Arrangements of lifeboats and liferafts	108.525 108.530	10.5 SOLAS 74 Chap. III, Reg 28	10.4, 10.5 SOLAS 74 Chap. III, Reg 28
Means of embarkation	108.540	10.11 SOLAS 74 Chap. III, Reg 48	10.3 SOLAS 74 Chap. III, Reg 48
Lifefloats	NVIC 4-78	*	*
Immersion suits	108.580 (c) 33CFR140.20-5	SOLAS 74 Chap. III, Reg 33	10.11 SOLAS 74 Chap. III, Reg 33
Lifejackets	108.580 (b)	10.3 SOLAS 74 Chap. III, Reg 32	10.10 SOLAS 74 Chap. III, Reg 32
Ring life buoys	108.580 (a)	10.4 SOLAS 74 Chap. III, Reg 31	10.12 SOLAS 74 Chap. III, Reg 31
Rescue boat	NVIC 4-78 180.560 - .570	10.2 SOLAS 74 Chap. III, Reg 47	10.7, 10.8, 10.9 SOLAS 74 Chap. III, Reg 47
Distress signals	108.595 (b)	10.8 SOLAS 74 Chap. III, Reg 35, 36 and 37	10.14 SOLAS 74 Chap. III, Reg 35, 36 and 37
EPIRB	108.650 SOLAS 74 Chap. IV, Reg 7	11.4.2.2, 11.4.5 SOLAS 74 Chap. IV, Reg 7	11.4.1.3 SOLAS 74 Chap. IV, Reg 7
Portable emergency radio	47 CFR 80.1095	10.7 SOLAS 74 Chap. III, Reg 6	10.13 SOLAS 74 Chap. III, Reg 6

* Indicates no equivalent International rule.

ITEM	U.S.	79 MODU CODE	89 MODU CODE
LIFESAVING EQUIPMENT (cont)			
Portable emergency radio stowage location	47 CFR 80.1095	10.7 SOLAS 74 Chap. III, Reg 6	10.13 SOLAS 74 Chap. III, Reg 6
Line throwing appliance	108.597	SOLAS 74 Chap. III, Reg 17	10.15 SOLAS 74 Chap. III, Reg 17
CRANES			
Cranes	108.601	12.1	12.1
Cranes examined/approved	107.258 - .259	12.1	12.1
MARKINGS AND INSTRUCTIONS			
Unit markings	67.120 - .123 108.661	*	*
Load line and draft marks	108.661 - .663 42.07-5	3.7 1966 Load Line Convention	3.7 1966 Load Line Convention
Heliport markings	108.241	13.4.2	13.4.2
Portable extinguisher markings	108.637	*	*
Location of self-contained breathing apparatus	108.635	*	*
General alarm switch and bells marked	108.623 - .625	*	*
Lifeboat markings	108.645	10.1.4 SOLAS 74 Chap. III, Reg 41.9	10.2 SOLAS 74 Chap. III, Reg 41.9
Inflatable liferaft markings	108.647	10.1.4 SOLAS 74 Chap. III, Reg 39.8	10.2 SOLAS 74 Chap. III, Reg 39.8
Ring buoy markings	108.649	10.4	10.12.4
Inflatable liferaft launching instructions	108.655	*	10.17
Watertight doors marked "Keep Closed"	108.665	3.6.5.1	3.6.5.1
MISCELLANEOUS			
Buoyant work vests	108.636 109.335 160.053	*	*
International shore connection	108.427	9.4.5 SOLAS 74 Chap. II-2, Reg 19	9.4.22 SOLAS 74 Chap. II-2, Reg 19
First aid kit	108.707	10.9	*
Obstruction lights	33CFR Part 67	14.7.2	14.7.2

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ITEM	U.S.	79 MODU CODE	89 MODU CODE
MISCELLANEOUS (cont)			
Fog signal	33CFR Part 67	14.7.2	14.7.2
Litter capable of being used in helo	108.709	10.9	*
Signal light	111.75-18	SOLAS 74 Chap. V, Reg 19	SOLAS 74 Chap. V, Reg 19
General alarms	113.25 109.201	9.7.2 10.6.4	10.16 10.18.6.3
Hot work	109.573	*	*
Illuminated magnetic steering compass	108.715 33CFR164.35	*	*
Magnetic compass deviation card	33CFR164.35	*	*
Maneuvering information fact sheet	109.564 33CFR164.35	* *	* *
Navigation publications	109.565 33CFR164.35	*	*
Sounding equipment	108.701 33CFR164.35	*	*
Navigation light indicator panel	111.75-17(b)	*	*
International code of signals	108.713	SOLAS 74 Chap. V, Reg 21	SOLAS 74 Chap. V, Reg 21
MAIN PROPULSION MACHINERY			
Propulsion machinery	58.05 111.35	4.1 - 4.7 7.1 - 7.4	4.1 - 4.7 7.1 - 7.4
Propulsion and auxiliary boilers	Part 52	4.1 - 4.5 7.1 - 7.4	4.1 - 4.5 7.1 - 7.4
Boiler fuel system	56.50-65 58.01-15	4.7	4.7
Boiler feed water system	56.50-30 -40	4.3, 7.3	4.3, 7.3
Boiler automation	Part 61	4.5, 7.4	4.5, 7.4
Boiler and superheater safety valves	52.01-120 56.50-25	4.2.4 4.3.1	4.2.4 4.3.1
High pressure steam piping	56.50-15 61.15-5	4.4	4.4
Diesels	58.10-10	4.1, 4.2, 4.6 and 7.4	4.1, 4.2, 4.6 and 7.4
Diesel fuel system	56.50-75	4.7	4.7
AUXILLIARY MACHINERY			
Low pressure heating boilers	Part 53	4.2.4, 4.3	4.2.4, 4.3
Steering gear system	58.25 111.93	7.5, 7.6, 7.10.3	7.5, 7.6, 7.10.3

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ITEM	U.S.	79 MODU CODE	89 MODU CODE
AUXILLIARY MACHINERY (cont.)			
Evaporators	54.01-10 54.15-15	*	*
Deck machinery	108.705	*	*
Bilge and ballast systems	56.50-50 - 90 33CFR155	4.8, 8.3	4.8, 4.9, 8.3
Lubrication systems	56.50-80	4.7.2	4.7.2
Fresh water system	61.10-5	*	*
Refrigeration and air conditioning	58.20	*	*
Sanitary system	61.10-5 33CFR159	*	*
Air receivers	61.10-5	4.6	4.6
Bulk tanks	Part 54 61.10-5		
Other pressure vessels	Part 54 58.60-3 61.10-5	*	*
Tensioner bottles	Part 54 61.10-5	*	*
Industrial systems	58.60 111.107	6.7, 8.10	6.7, 8.2.3
Mud pumps	58.60	6.7, 8.10	6.7, 8.2.3
Elevators	111.91	12.2	12.2
ELECTRICAL INSTALLATIONS			
General electrical installations	Part 111	5.1	5.1
Service generators	111.12	5.1 - 5.2, and 5.5 7.9, 8.7.2	5.1 - 5.2, and 5.5 7.9, 8.7.2
Emergency generator	112.50	5.3 - 5.4	5.3 - 5.4
Emergency batteries	112.55	5.3, 7.10	5.3, 7.10
Service power and lighting	111.75	5.2.2, 5.5.5 and 5.5.7	5.2.4, 5.5
Emergency power and lighting	Part 112	5.3 - 5.4, 7.10	5.3.6, 7.10
Lifeboat station emergency lighting	111.75-16	5.3.2 SOLAS 74 Chap. III, Reg 11	5.3.6 SOLAS 74 Chap. III, Reg 11
Inflatable liferaft station emergency lighting	111.75-16	5.3.2 SOLAS 74 Chap. III, Reg 11	5.3.6 SOLAS 74 Chap. III, Reg 11

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ITEM	U.S.	79 MODU CODE	89 MODU CODE
ELECTRICAL INSTALLATIONS (cont)			
Switch boards	111.30	5.5.2, 5.3.1, 5.3.5 and 8.7.2	5.3.11, 5.3.13, 5.5.5 and 5.5.6
Motor controllers	111.70	5.5	5.5
Internal communications and control systems	113.30	4.5, 5.6, 7.4, 8.4, and 8.5	4.5, 5.6, 7.4, 8.4, and 8.5
DIVING SYSTEM INSTALLATIONS			
Diving supervisor designated	197.210	14.6	14.6
Person in charge of diving operations designated	197.208 197.402	14.6	14.6
Diving operations manual	197.420	14.6	14.6
Diving air compressors	197.310	14.6	14.6
Diving breathing supply	197.340 197.450	14.6 14.6	14.6 14.6
Surface supplied air	197.432	14.6	14.6
Surface supplied mixed gases	197.434	14.6	14.6
PVHO's	197.328 - .334	14.6	14.6
Diving helmets	197.322	14.6	14.6
Diving hoses	197.312	14.6	14.6
Diving harness	197.324	14.6	14.6
Diving depth gauge and time keeping device	197.318	14.6	14.6
Diving ladders and stages	197.320	14.6	14.6
Diving logbook	197.482	14.6	14.6
Diving first aid equipment	197.314	14.6	14.6
SCUBA operations	197.430	14.6	14.6
TESTS, DRILLS AND INSPECTIONS			
Boat drill	109.213(c)&(d) 109.431 - .433	10.6.3	14.11.1
Fire drill	109.213(f)	10.6.3.3	14.11.1
Lifeboat operated in water	109.213(d)	10.6.3.3	14.11.5
Lifeboat disengaging apparatus tested	109.213(d)	10.5 SOLAS 74 Chap. III, Reg 18	14.11.5 SOLAS 74 Chap. III, Reg 18

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ITEM	U.S.	79 MODU CODE	89 MODU CODE
TESTS, DRILLS AND INSPECTIONS (cont)			
Lifeboat fuel changed annually	109.301	*	*
Lifeboat stripped and inspected	109.301	10.6.3.3	10.18
Lifeboat winch tested	109.301	10.6.3.3	10.18
General alarm tested	109.301(d)(3)	*	10.18.6.3
Steering gear tested	109.201 33CFR164.25	* *	* *
Immersion suits worn during drills	109.213(d)(7)	*	14.11.2.4
EPIRB tested	109.301	*	*
Emergency generator tested	109.211, .213	5.3.7	5.3.16
Emergency batteries tested	109.211, .213	5.3.7	5.3.16
REPORTS, CERTIFICATES AND RECORDS			
Record of servicing of fire extinguisher equipment and systems	109.223 109.435	1.6, 9.6 SOLAS 74 Chap. I, Reg 7	1.6, 9.6 SOLAS 74 Chap. I, Reg 7
Record of servicing of inflatable liferafts	109.301(f)(1)	1.6 SOLAS 74 Chap. I, Reg 7	1.6 SOLAS 74 Chap. I, Reg 7
Person in charge designation	109.107 33CFR146.5	10.6.1	14.8
Citizenship requirements	33CFR141	*	*
Station bill	108.901	10.6.2	14.8.10 - 14.8.16
Operations manual	109.121	14.1	14.1
Construction portfolio	107.305(hh)	2.8	2.9
Fire control plan	107.305(v)	9.13.1 14.1.2.13 SOLAS 74 Chap. II, Reg 20	9.13.1 14.14.1 SOLAS 74 Chap. II, Reg 20
Classified location plan	110.25-1(k)	14.1.2.12	14.1.2.15
Crane operator designation	109.527	*	*
Crane record book	109.437	12.1.4	12.1.6
Crane certificates	109.439	12.1.4`	12.1.6
Logbook	109.431 - .433	*	14.13
Emergency Evacuation Plan	33CFR146.210	*	*
Shipboard Oil Pollution Emergency Plan	33CFR151.29	*	*

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