



16703
D8(OCS) Policy Letter 01-2020
May 19, 2020

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From: M.J. Dougherty, LCDR
D8 OCS OCMI, Acting

To: Distribution

Subj: EMERGENCY EVACUATION DRILLS ON MANNED FACILITIES WITH
LIFEBOATS

Ref: (a) 33 CFR 146, Subpart B
(b) 33 CFR 140.15
(c) 33 CFR 146.125

1. Purpose. This policy letter clarifies lifeboat launching requirements and provides guidance for verifying compliance with reference (a) regarding emergency evacuation drills on Fixed and Floating Outer Continental Shelf (OCS) Facilities not subject to the Convention for the Safety of Life at Sea (SOLAS). While setting the minimum standard for the launching of lifeboats and rescue boats, it does not limit Operators from completing additional training.
2. Action. Personnel conducting inspections of behalf of the OCS OCMI shall comply with this policy.
3. Directives Affected. Revision 1 of D8(OCS) POLICY LTR 04-2016 dated 07 May 2018 is canceled.
4. Background.
 - a. On October 31, 2016, this office published D8(ocs) Policy Ltr 04-2016 in response to a National Offshore Safety Advisory Committee (NOSAC) final report titled "Lifeboat Safety", dated November 18, 2015. During policy implementation both industry and the Coast Guard identified potential improvements to this policy.
 - b. On April 3, 2018 the Offshore Operator's Committee (OOC) published guidance on alternatives to lifeboat loading. On May 7, 2018, the D8 OCS OCMI published Revision 1 to Policy Letter 04-2016. This revision incorporated OOC Guidance as an alternative acceptable to the Coast Guard for compliance with reference (c).
 - c. Revision 1 was reevaluated in conjunction with ongoing efforts to normalize Fixed and Floating OCS Facility regulatory oversight practices.
5. Policy.
 - a. The OCMI interprets the requirements of 33 CFR 146.125(c)(1) to mean that all lifeboats aboard a facility, shall, at a minimum, be launched annually with the assigned lifeboat crew in order to fulfill the requirements of the annual emergency evacuation drill required by the unit's Emergency Evacuation Plan (EEP).

- b. Reference (a) mandates that equipment specified within the EEP be available, designed, and maintained to be capable of performing its intended function. In addition, all personnel with assigned emergency duties are required to be trained to perform their designated roles. The default method for verifying the competency of personnel, and the fitness of emergency equipment, is the evaluation of drills in accordance with an approved EEP. This includes the lowering and launching of lifeboats.
 - c. It is strongly recommended all persons on the facility be proficient in lifeboat loading procedures and be familiar with lifeboat equipment (e.g. donning safety harness, pressurization system, sprinkler operation, supply storage, auxiliary starting, oar and hand tiller utilization).
 - d. Per reference (b), the OCS OCMI evaluates alternative plans that do not include the launching of lifeboats. Alternative plans should ensure a degree of safety comparable to, or greater than, that afforded by actual launching. All aspects of maintenance and competency demonstrated and/or assessed during the launching of lifeboats should be accomplished through the implementation of the alternative.
 - e. Vessels subject to SOLAS who wish to pursue an alternative to their required launching schedule should engage with their Flag Administration.
 - f. Alternative plans must be submitted electronically via ocscorrespondence@uscg.mil to the OCMI no later than ninety (90) days before intended implementation. All elements of an approved alternative will be practically assessed before approval and during subsequent Coast Guard examinations.
6. Forms/Reports: None
 7. Questions. Questions regarding this policy may be directed to Mr. Edward Lacy at (504) 671-2151.
 8. Distribution.
 - a. Eighth District units tasked with conducting inspections of behalf of the OCS OCMI in CGDINST M16613.3 dated 19 May 2020
 - b. Internet release authorized.

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