

MODU Option “B” Marshall Islands (MI)

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

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

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

“The **design and equipment standards** 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”.

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

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

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

“The **operating standards** of the documenting nation if the standards provide a level of safety generally equivalent to or greater than that provided under 46 CFR part 109”.

August 09, 2002: CG completed an evaluation of the Marshall Islands’ standards (MI-293, rev 8/00) for “existing” units compared to U.S. requirements, including MI’s interpretations of the 1979 and 1989 MODU codes. NVIC 4-78 was used as the comparison for existing units and 46 CFR Subchapter I-A was used for the 1979/1989 MODU Code comparisons. The CG determined that MI’s standards and 1979/1989 interpretations were equivalent to U.S. requirements, as long as some additional requirements were met. These additional requirements were *incorporated into MI-293 (Part VI) through revision 8/02*.

Therefore, (1979 & 1989 MODU Code) MODUs that:

- a. Are documented under the laws of Marshall Islands;
- b. Are constructed **on or after** December 31, 1981;
- c. Hold, and are in compliance with, a valid International MODU Safety Certificate issued under MI-293 (Rev 02); **and**
- d. Comply with the additional requirements identified in Part VI.

Are considered to be in compliance with 33 CFR 143.207(c) and 33 CFR 146.205(c) and eligible to receive a CG COC (**Option “C”**), after a satisfactory inspection, to engage in OCS activities on the U.S. OCS.

Likewise, (Existing, pre-MODU Code) MODUs that:

- e. Are documented under the laws of Marshall Islands;
- f. Are constructed **before** December 31, 1981;
- g. Hold, and are in compliance, with a valid Marshall Island MODU Document of Compliance issued under MI-293 (Rev 02); **and**
- h. Are in compliance with the additional requirements identified in the CG Supplement

Are considered to be in compliance with 33 CFR 143.207(b) and 33 CFR 146.205(b) and eligible to receive a CG COC (**Option “B”**), after a satisfactory inspection, to engage in OCS activities on the U.S. OCS.

Important: There was **an equivalency granted** to 33 CFR 146.205(b), so 46 CFR 109 **DOES NOT** apply to these MODUs.

MI-293 (Rev. 8/02)

Part I - General Requirements

Part II - Definitions

Part III – 1989 MODU Code Interpretations:

- Units **meeting** the 1989 MODU Code are equivalent to MI-293 **EXCEPT AS MODIFIED** by the Interpretations of the MI Administration in Part III,
- Units constructed **on or after** 1 May 1991,
- Issued International Mobile Offshore Drilling Unit Safety Certificate (1989, **and**
- Part VI also applies.

The table below shows the MI-293 cites (Part III) that require you to use additional references:

Note: It is important to use 74 SOLAS (81 Amendments) based on the MODU’s build date.

MI-293 (Rev. 8/02)		INTERNATIONAL REFERENCES
Part III/H	Chapter 9	74 SOLAS
Part III/M	Entire Section	74 SOLAS
Part III/N	Entire Section (Non-Self-Propelled Only)	74 SOLAS

Part IV – 1979 MODU Code Interpretations:

- Units **meeting** the 1979 MODU Code are equivalent to MI-293 **EXCEPT AS MODIFIED** by the Interpretations of the MI Administration in Part IV,
- Units constructed **on or after** 31 December 1981 and **prior to** 1 May 1991,
- Issued International Mobile Offshore Drilling Unit Safety Certificate (1979), **and**
- Part VI also applies.

The table below shows the MI-293 cites (Part IV) that require you to use additional references:

Note: It is important to use either 74 SOLAS (Unamended) or 74 SOLAS (81 Amendments) depending on the MODU’s build date.

MI-293 (Rev. 8/02)		INTERNATIONAL REFERENCES
Part IV/H	Chapter 9	74 SOLAS
Part IV/H	Chapter 9.7.1	74 SOLAS
Part IV/I	Chapter 10	74 SOLAS
Part IV/M	Entire Section	74 SOLAS
Part IV/N	Entire Section (Non-Self-Propelled Only)	74 SOLAS
Part IV/I	Chapter 10	1989 MODU Code

Part V – Marshall Islands (Existing, Pre-MODU Code) MODUs:

- Units **not meeting** the 1979 or 1989 MODU Codes must comply with the national requirements outlined in this Part,
- Units constructed **prior to** 31 December 1981,
- Issued a MI National Mobile Offshore Drilling Unit Document of Compliance, **and**
- Part VI also applies.

The table below shows the MI-293 cites (Part V) that require you to use additional references:

Note: It is important to use either 74 SOLAS (Unamended) or 60 SOLAS depending on the MODU’s build date.

MI-293 (Rev. 8/02)		INTERNATIONAL REFERENCES
Part V	C.2	1979 MODU Code
Part V	C.3	International Convention on Load Lines
Part V	D.1 (Self-Propelled)	74 SOLAS
Part V	E.1	1979 MODU Code
Part V	E.3	1979 MODU Code
Part V	F.1	1979 MODU Code
Part V	F.7	1979 MODU Code
Part V	G.3	74 SOLAS 1989 MODU Code
Part V	G.4	1979 MODU Code
Part V	G.7	1979 MODU Code
Part V	J	1979 MODU Code
Part V	L	74 SOLAS
Part V	M	74 SOLAS

Part VI – Additional Requirements for the USCG (LOC/COC):

- USCG **additional requirements** for MI flagged MODUs which must also be met **before** issuance of a Certificate of Compliance
- These additional requirements will refer back to various sections of Parts III, IV & V

The table below shows the MI-293 cites (Part VI) that require you to use additional references:

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

MI-293 (Rev. 8/02)		REFERENCES
Part VI	A.2	NVIC 3-88, CH-1
Part VI	A.3	33 CFR 146.205
Part VI	A.4	MARPOL International Convention on Load Lines
Part VI	A.5	1979 MODU Code 1989 MODU Code
Part VI	A.6	1989 MODU Code
Part VI	A.7	33 CFR Parts 130 and 135 40 CFR 125.120
Part VI	A.8	33 CFR Part 142
Part VI	A.9	33 CFR 146.120
Part VI	B.1	33 CFR Subchapter N
Part VI	B.2	33 CFR Subchapter O
Part VI	B.3	33 CFR Part 164
Part VI	B.4	46 CFR 61.10 MOC Policy Letter 01.03
Part VI	B.5	33 CFR 108.503 46 CFR Subchapter W
Part VI	B.6	46 CFR 109.301
Part VI	B.7	46 CFR 109.223
Part VI	B.8	46 CFR 108.209 or .210 46 CFR 108.707
Part VI	B.9	46 CFR 111.60 46 CFR 111.105