

MODU Option “C”
1989 & 2009 MODU Codes

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(c) – *otherwise known as Option “C”*.

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

“The **design and equipment** standards for mobile offshore drilling units contained in the International Maritime Organization (IMO formally Inter-Governmental Maritime Consultative Organization or IMCO) (IMO) Code for Construction and Equipment of Mobile Offshore Drilling Units (IMO Assembly Resolution A.414 (XI)) which has been incorporated by reference.”

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(c) – *otherwise known as Option “C”*.

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

“The **operating** standards for mobile offshore drilling units contained in the International Maritime Organization (IMO formally Inter-Governmental Maritime Consultative Organization or IMCO) (IMO) Code for Construction and Equipment of Mobile Offshore Drilling Units (IMO Assembly Resolution A.414(XI)) which has been incorporated by reference **and** the requirements of 46 CFR Part 109 for **matters not addressed** by the Code.”

Note that while §143.207(c) and §146.205(c) reference the MODU Code (1979), the 1989 and 2009 MODU Codes have been determined by the CG to meet or exceed the requirements of the 1979 MODU Code and are accepted as equivalents.

The chart on the following pages shows the various cites for the “**matters not addressed**” in the **1989** and **2009** MODU codes as required in 46 CFR 109.

Note: The comparison for the 1979 MODU Code is addressed on a separate training aid.

CITE TITLE	46 CFR	89 MODU Code Constructed 01May91-31Dec11	09 MODU Code Constructed 01Jan12-Present
Person-In-Charge	109.107 – .109	14.9.1 – 14.9.2	14.10.1 – 14.10.2
Operating Manual	109.121	14.1	14.1
Steering Gear, Whistles, General Alarm & Means of Communication	109.201	11.3,14.8 & 10.18.6.3	11.10, 14.9 & 10.18.7.4
Sanitation	109.203	Utilize 109 Cite	Utilize 109 Cite
Inspection of Boilers and Machinery	109.205	Utilize 109 Cite	Utilize 109 Cite
Appliances for Watertight Integrity	109.209	Utilize 109 Cite	Utilize 109 Cite
Testing of Emergency Lighting & Power Systems	109.211	Utilize 109 Cite	Utilize 109 Cite
Emergency Training & Drills	109.213	14.11 – 14.15	14.12 – 14.16
Firefighting Equipment	109.223	Utilize 109 Cite	9.19.4
Verification of Vessel Compliance with Applicable Stability Requirements	109.227	Utilize 109 Cite	Utilize 109 Cite
Operational Readiness, Maintenance & Inspection of Lifesaving Equipment	109.301	10.18	10.18
Manning of Survival Craft & Supervision	109.323	14.9.3 – 14.9.9	14.10.3 – 14.10.9
Fire Pumps	109.329	9.4.2	9.7.2
Firehoses & Hydrants	109.331	9.4	9.7
Fire Main Cutoff Valves	109.333	9.4.16	9.7.16
Working Over Water	109.334 “33 CFR 142.45”	Utilize 109 Cite	Utilize 109 Cite
Stowage of Work Vests	109.335 “33 CFR 146.20(c)”	Utilize 109 Cite	Utilize 109 Cite
Fireman’s Outfit	109.337	9.9	9.13
Location of Fire Axes	109.339	Utilize 109 Cite	Utilize 109 Cite
Pilot Boarding Equipment	109.347	Utilize 109 Cite	12.4
Notice & Reporting of Casualty	109.411	1.6.6.1.3,1.8	1.6.6.3, 1.8
Retention of Records “after a casualty”	109.415	Utilize 109 Cite	Utilize 109 Cite

CITE TITLE	46 CFR	89 MODU Code Constructed 01May91-31Dec11	09 MODU Code Constructed 01Jan12-Present
Report of Unsafe Machinery	109.419	1.6.6.1.3	1.6.6.3
Report of Repairs to Boilers & Pressure Vessels	109.421	1.6.6.1.3	1.6.6.3
Repairs & Alterations: Fire Detecting & Extinguishing Equipment	109.425	1.6.6.1.3	1.6.6.3
Logbook	109.431	14.15	14.16
Logbook Entries	109.433	14.15	14.16
Record of Firefighting Equipment Inspection	109.435	Utilize 109 Cite	14.16.2.5
Crane Record Book (Manual)	109.437	12.1.10	12.1.10
Crane Certification	109.439	12.1.5,12.1.6	12.1.5, 12.1.6
Emergency Signals	109.503	5.6,14.1.2.7,14.9.11	5.7.2, 14.1.2.7 & 14.10.11
Cranes: General	109.521	12.1	12.1.1
Cranes: Working load	109.525	12.1.7,12.1.8	12.1.7, 12.1.8
Cranes: Operator Designation	109.527	Utilize 109 Cite	Utilize 109 Cite
Propulsion Boilers	109.555	4.4.3	4.4.1
Flammable & Combustible Liquids: Carriage	109.557	14.2.2,14.2.3	14.4.3 & 14.4.4
Explosives & Radioactive Materials	109.559	14.2.2,14.2.5	14.4.2 & 14.4.5
Posting of Documents (FCP)	109.563	9.13.1	9.18
Maneuvering Characteristics	109.564	Utilize 109 Cite	Utilize 109 Cite
Charts & Nautical Publications	109.565	Utilize 109 Cite	11.10.1
Riveting, Welding & Burning Operations	109.573	Utilize 109 Cite	Utilize 109 Cite
Accumulation of Liquids on Helicopter Decks	109.575	Utilize 109 Cite	Utilize 109 Cite
Helicopter Fueling	109.577	9.11.3,9.11.14	9.16.6
Use of Auto Pilot	109.585	Utilize 109 Cite	Utilize 109 Cite