

U.S. Department of
Homeland Security

United States
Coast Guard



Director
National Vessel Documentation Center

792 T J Jackson Drive
Falling Waters, WV 25419
Staff Symbol: NVDC0
Phone: (304) 271-2506
Christina.G.Washburn@uscg.mil

16713/5/2
October 28, 2024

Dana Merkel
Blank Rome
1825 Eye Street, NW
Washington, D.C. 20006

Dear Ms. Merkel:

This is in response to your letter of October 14, 2024 requesting confirmation that certain modifications to the build details as previously considered in a build determination letter dated February 17, 2022 will not adversely affect the U.S. build status of, and the ability to document with a coastwise endorsement upon its completion, the Mobile Offshore Self-Elevating Service Unit identified as NG-16000X-SJ (herein, the "Vessel"), currently under construction at Seatrium's shipyard in Brownsville, Texas. For the sake of clarity, I note that the build determination letter dated February 17, 2022 addressed the vessel as being built by Keppel AMFELS, Inc., whereas your present determination request notes the builder as being Seatrium AmFELS, Inc; however, the building company is functionally the same as referenced in the February 17, 2022 determination letter, as is the shipyard in which the vessel is being built in Brownsville, Texas.

Your letter detailed proposed modifications to certain topside stowage arrangements on the Vessel used for storing and securing wind turbine components and equipment, including a cantilever support system, blade racks, and wind turbine tower and blade rack grillage. To structurally accommodate such modifications, your letter proposed additional hull side shell strengthening in the stern of the Vessel, as well as internal stiffening below the mid-deck areas. Your letter represented that only U.S. steel would be used for the hull side and mid-deck shell strengthening work. Further, your letter indicated that such proposed topside stowage arrangements would be foreign-fabricated, temporary in nature, and able to be removed and reinstalled as the needs of the Vessel change with each project. Finally, your letter notes that the Vessel will be outfitted with temporary equipment, storage containers, and seafastening for such additions, with outfitting including a gangway, small boat landing platform, containers, lifting equipment, storage racks, and seafastening for such outfitting. Included with your letter was a diagram of the work to be performed.

Pursuant to our review of your submission and consistent with National Vessel Documentation Center ("NVDC") past practice, we requested a review and analysis of the representations made and diagram of proposed work in your October 14, 2024 letter by the Coast Guard's Naval Architecture Division ("NAD").

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Regarding the discounted steelweight evaluation, NAD observed that the prior determination's discounted steel weight of the vessel was 11,835.38 Mtons (11,623.7 Ltons). Considering the additional structural steel as proposed, NAD agreed with and accepted the updated discounted steel weight of 11,863.38 Mtons (11,651.5 Ltons). Regarding foreign-source components and weights, NAD determined that the current modifications constitute outfitting items related to stowage of wind turbine component and deck equipment, which are not included in the foreign weight limit, resulting in no change to NAD's previous weight determination.

NAD concluded that, based upon an updated discounted steel weight of 11,863.38 Mtons (11,651.53 Ltons), the updated allowable 1 ½ percent foreign steel component weight limit for U.S. build determinations is now 178.0 Mtons (174.8 Ltons). The total foreign component weight is unchanged at 44.91 Mtons (44.11 Ltons), which is within the allowable limit. NAD further determined that, for future foreign rebuild determinations, if any, the 7 ½ percent total lifetime foreign steel weight for structural repairs or modifications in foreign shipyards is now 889.8 Mtons (873.9 Ltons), and the 1 ½ percent "major assembly" weight limit is 178.0 Mtons (174.8 Ltons).

In light of the foregoing, and based upon the information provided, I confirm that the proposed modifications will not adversely affect the U.S. build status of, and eligibility to operate in, the coastwise trades of the United States upon completion of the Mobile Offshore Self-Elevating Service Unit identified as NG-16000X-SJ.

Sincerely,



Christina G. Washburn
Director