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CG-543 Policy Letter 11-06

From: 
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COMDT (CG-543)

JUN - 8 2011

To: Distribution

Subj: RISK-BASED TARGETING OF FOREIGN FLAGGED MOBILE OFFSHORE
DRILLING UNITS (MODUs)

a. PURPOSE. This policy letter provides procedures for risk-based targeting of foreign flagged Mobile Offshore Drilling Units (MODU) operating on the United States Outer Continental Shelf (OCS). It also includes general guidelines on required documentation of foreign flagged MODU examinations and an attachment describing how to enter the relevant examination activities into MISLE.

2. ACTION. District and Sector Commanders will ensure compliance with the provisions of this policy letter.

3. DIRECTIVES AFFECTED. None.

4. BACKGROUND. Every foreign flagged MODU must meet the requirements of 33 CFR Subpart C, undergo a Coast Guard examination, and be issued a Certificate of Compliance (COC) in accordance with 33 CFR 143.210 prior to engaging in OCS activities. A COC is issued for a period of 2 years based on satisfactory completion of the Coast Guard examination. The OCMI must re-inspect each MODU between 9 to 15 months after the vessel's COC issuance date to determine whether the MODU remains in full compliance allowing it to continue operations on the OCS for another year.

Aside from this annual examination requirement, there is currently no process in place to identify a foreign flagged MODU that may require more Coast Guard oversight while operating on the U.S. OCS (i.e. based on inspection history or other related factors). To address this concern, the enclosed *Mobile Offshore Drilling Unit (MODU) Safety and Environmental Protection Compliance Targeting Matrix* has been developed to assist OCMI's in determining whether a foreign flagged MODU may require increased oversight through more frequent examinations by the Coast Guard. The concept for this targeting matrix is based on the existing risk-based Port State Control (PSC) Program targeting matrix used to identify high-risk foreign flagged vessels operating, or desiring to operate in U.S. waters, and which is used to subject these high-risk foreign flagged vessels to more frequent Coast Guard examinations/oversight.

5. DISCUSSION. Following the April 2010 MACONDO 252 well incident and ensuing environmental disaster, and in an effort to enhance safety on the U.S. OCS, the Coast Guard identified the need for additional oversight of foreign flagged MODUs.

The enclosed *Mobile Offshore Drilling Unit (MODU) Safety and Environmental Protection Compliance Targeting Matrix* has been developed based on the *Port State Control Safety and Environmental Protection Compliance Targeting Matrix*; which has been successful in targeting substandard vessels for over 10 years. The matrix will enable the Coast Guard to rationally and systematically determine the probable risk posed by foreign flagged MODUs operating on the U.S. OCS.

The first three columns/entities of the matrix remain the same with minor changes made to terminology specific to MODUs. These entities are: I) MODU Management (to include lease holder), II) Flag State and III) Recognized Organizations/Classification Societies. If any of these entities fail to fully undertake their responsibilities for the safe operation of an associated foreign flagged MODU, then that MODU, based on its final targeting matrix score, may be identified as requiring more stringent Coast Guard oversight. Column IV takes into account the Coast Guard's 12 month-cumulative experience with a particular MODU. Finally, Column V applies points based on a MODUs propulsion type, design particulars, and or age. Targeting points will be assigned in each of the five columns, and then totaled for the final point score. A MODUs matrix point score will determine if it warrants additional oversight through more frequent Coast Guard examinations.

6. PROCEDURES. The procedures outlined below will be used when conducting examinations on foreign flagged MODUs operating on the U.S. OCS.

- a. The foreign flagged MODU matrix targeting is a new initiative and there is currently minimal, to no substantial background information provided in MISLE. For this reason the Officer in Charge, Marine Inspection (OCMI) will initially screen all foreign flagged MODUs within their OCMI zone based on the current MISLE records available. Matrix point totals will determine if MODUs with a valid COC will require more frequent Coast Guard oversight through additional examinations.
- b. After the initial scoring of MODUs currently operating the U.S. OCS, MODUs will be scored manually by each OCMI each time an Advanced Notice of Arrival (ANOVA) is submitted on their behalf, which includes arrival on the U.S. OCS and movement between OCS blocks in accordance 33 CFR 147. The National Vessel Movement Center (NVMC) will initially collect, review, and verify specific MODU information including MODU type and size, cargo, crew list, MODU management information, and security and safety compliance documentation, etc. The NVMC then makes the ANOVA available to the National Maritime Intelligence Center (NMIC) and to the OCMI's through the Ship Arrival Notification System (SANS). The NVMC also makes the ANOVA accessible through MISLE. The NMIC analyzes MODU owner, operator, charterer, crew composition, history, etc. to determine whether there is pertinent intelligence regarding the MODU. The NMIC will then issue a daily message for Vessels of Intelligence Interest (VOII).

c. The OCMI will prioritize and coordinate the examination of MODU's entering their AOR. The OCMI will review each MODU arrival in MISLE paying close attention to the MODU matrix score. The calculated score may be raised or lowered based on amplifying information available and at the discretion of the OCMI. The MISLE vessel arrivals screen must also be updated to record a MODU's arrival and departure from the AOR. After completing the above steps, the OCMI will create an inspection activity in MISLE for each MODU that requires an examination. A full tutorial on processing arrivals and scheduling exams for foreign vessel (same process for MODU's) arrivals can be accessed at http://mislenet.osc.uscg.mil/User_Guides/Tutorials/SchedForeignVsl_Arrvl.htm.

d. MODU Safety and Environmental Protection Compliance Targeting Matrix Scoring

1. Column I: Management. A targeted vessel management company includes any owner, operator, lessee, charterer, or managing operator whose vessels have been detained in the U.S. more than once within the previous 12 months under the provisions of an international Convention. CG-5432 will maintain a current listing of targeted ship management companies based on detention reports received from Coast Guard field units; this list is updated monthly. CG-5432 will remove a targeted management company once their vessels are associated with less than two detentions within a 12 month period.
 - i. If the owner, lessee, managing operator, or charterer of a MODU is included on the current Targeted Vessel Management Company List provided by CG-5432, assign 5 points. Although listed in the same column the owner, lessee, managing operator, and charterer should be scored separately.
 - ii. The OCMI may assign a maximum total of 5 points for this column.
 - iii. Proceed to Column II.
2. Column II: Flag. A targeted Flag Administration is a country with a safety-related detention ratio exceeding the average safety detention ratio for all Flag Administration's with vessels operating in U.S. waters. CG-5432 calculates a Flag Administration's safety detention ratio by dividing the number of its vessels detained under the authority of an international convention by the number of vessels under its registry which entered U.S. waters.

CG-5432 calculates the average safety detention ratio for all Flag Administrations with vessels operating in U.S. waters by dividing the number of vessels detained under the authority of an international convention by the number of vessels that entered U.S. waters. CG-5432 calculates individual Flag Administration detention ratios based on data from the previous three years in order to reduce the effects of single year anomalies.

CG-5432 compiles a list consisting of targeted Flag Administrations on an annual basis for use with the *PSC Safety and Environmental Protection Compliance Targeting Matrix*. This list can be found on the Web, accessible at <http://homeport.uscg.mil/mycg/portal/ep/browse.do?channelId=-18371>.

The OCMI assigns either 7 points or 2 points to vessels registered with a targeted Flag Administration in Column II of the *PSC Safety and Environmental Protection Compliance Targeting Matrix*. The list provided on the Web, lists the number of points applicable to the various targeted Flag Administrations. This list is accessible at <http://homeport.uscg.mil/mycg/portal/ep/browse.do?channelId=-18371>.

A targeted Flag Administration is removed from the list when its safety detention ratio drops below the average safety detention ratio for all Flag Administration's with vessels operating in U.S. waters, or when it is associated with less than two detentions carried out under the authority of an international Convention within the past 36 months.

- i. Check the vessel's Flag Administration against the current targeted Flag Administration list. If the list shows the Flag Administration as being targeted assign 7 points or 2 points, as indicated.
 - ii. Proceed to Column III.
3. Column III: Recognized Organization. CG-5432 evaluates Recognized Organizations (ROs) based on their performance over the previous three years. If they have a 3-year safety detention ratio that exceeds the fixed 3-year safety detention ratio (0.5%), then that Organization will receive points. A RO is an organization, such as a Classification Society that issues Certificates of Class or International Convention Certificates on behalf of a Flag Administration.

The Targeted Organization List contains the names of ROs that will receive points on the *MODU Safety and Environmental Protection Compliance Targeting Matrix*. This list is accessible at <http://homeport.uscg.mil/mycg/portal/ep/browse.do?channelId=-18371>.

CG-5432 calculates RO performance based on their RO-related safety detention ratio (number of RO-related safety detentions divided by the number of distinct arrivals over a 3-year period). CG-5432 then compares this ratio to the fixed ratios of acceptable performance and assigns points to the RO according to where their safety detention ratios fall. See Table 1 below:

Table 1: Detention Ratios and Point Assignments.

Recognized Organization's 3-year Detention Ratio	Matrix Point Assignment
A detention ratio less than 0.5%	0 Points
A detention ratio equal to 0.5% or less than 1%	3 Points
A detention ratio equal to 1% or less than 2%	5 Points
A detention ratio equal to or greater than 2%	Priority I

Check the vessel's RO against the current targeted list. If the list shows the RO as being targeted assign the appropriate number of points as indicated. See <http://homeport.uscg.mil/mycg/portal/ep/browse.do?channelId=-18371>.

4. Column IV: Vessel History.

- i. If MISLE data indicates the Coast Guard has not performed a COC exam in the past 12 months or the MODU has never been to the United States, then assign PRIORITY status. If the OCMI determines, after the initial exam and issuance of the COC, that the MODU meets all applicable safety requirements then they may "downgrade" the MODU to Non-Priority, eliminating the six month examination requirement.
- ii. If MISLE data indicates that the MODU has been the subject of an exam resulting in non-issuance of a COC within the past 12 months, assign 5 points for each occurrence. CG-5432 will enter an inspection note after reviewing reports received from field units. This notice will assist in identifying MODUs not receiving their COC during the inspectors initial examination within the previous 12 months, *but may not include very recent examinations*. Field units must check the MISLE Vessel Critical Profile to determine whether any recent exams resulting in non-issuance of a COC have occurred. This can be done by reviewing the narratives for the MODUs MISLE inspection activities.
- iii. If MISLE data indicates that the MODU has been the subject of any other form of operational control within the past 12 months (i.e., COC suspension, COTP Order, Letter of Deviation, etc.), assign 1 point for each incident. Do not assign multiple points if the field unit took more than one control action for a single incident.
- iv. If MISLE data indicates that the MODU has been involved in a reportable marine casualty or pollution case, as defined in 33 CFR 140.201, within the past 12 months, assign 1 point for each case.

- v. If MISLE data indicates that the MODU has been the subject of a marine violation, except for pollution, within the past 12 months, assign 1 point for each violation case.
 - vi. If MISLE data indicates the MODU has an outstanding deficiency which was not satisfactorily corrected by the required due date, assign 1 point each.
 - vii. The total points in Column IV are unlimited.
5. Column V: MODU Particulars. For purposes of this matrix the following definitions and points apply. MODU details should be verified through Class and/or International documents and entered in vessel particulars in MISLE.
- i. Self-Propelled – MODU has propulsion machinery (including a Dynamic Positioning system) that provides for independent underway navigation. Assign 5 points.
 - ii. Semi-Submersible – a column stabilized MODU designed for offshore operations; either afloat or supported by the sea bed. Assign 3 points.
 - iii. Jack-Up (self-elevating unit) – a MODU with movable legs capable of raising its hull above the surface of the sea. The hull has sufficient buoyancy to transport the unit to the desired location. Once on location, the hull is raised to a predetermined elevation above the sea surface on its legs, which are supported by the sea bed. The legs of such units may be designed to penetrate the bed, may be fitted with enlarged sections or footings, or may be attached to a bottom mat. Assign 2 points.
 - iv. Submersible – a column stabilized MODU designed for offshore operations solely when supported by the sea bed. Assign 1 point.
 - v. Age – delivery date of the MODU shall be used for age determination. Assign the following points based on age: 0-4 years (subtract 3 points), 5-9 years (subtract 2 points), 10-14 years (add 0 points), 15-19 years (add 3 points), 20-24 years (add 5 points), and 25+ years (add 7 points).
6. Total Targeting Matrix Score/Priority Assignment.
- i. 12 or more points = Priority MODU
 - ii. 11 or fewer = Non-Priority MODU
- e. Targeting Decision and Examination Frequency

The *MODU Safety and Environmental Protection Compliance Targeting Matrix* evaluates a vessel's relative risk of non-compliance with maritime safety standards and results in the

assignment of points. Each matrix will provide a total that corresponds to the designations of Priority or Non-Priority.

Priority MODUs will be examined every six months after receiving their initial or renewal COC. They will remain on a six month schedule until they undergo two (2) successive exams with less than three (3) deficiencies.

f. Priority Downgrade Clause

If a MODU has undergone a satisfactory COC or COC annual exam within the past 6 months with no serious deficiencies, and all of the deficiencies issued during the exam have been corrected to the Coast Guard's satisfaction, the OCMI may downgrade the MODU to Non-Priority. If the exam priority of a MODU is downgraded to Non-Priority, it will be added to the unit's pool of potential random examinations.

g. Stacked MODU's

Upon receiving notification, either through ANOA or otherwise, that a MODU will be or has been in a "stacked" condition, the OCMI will contact the owner/operator to advise them on the provisions contained in NVIC 3-88, Change 1 and Marine Safety Manual, Volume II, Chapter 8. In accordance with 33 CFR 146.202, D8 (dpi) should receive notification (who then notifies the cognizant OCMI) when a MODU plans to relocate and/or return to service. Following this notification, inspectors will schedule and complete a satisfactory inspection to ensure that all crew members are capable of performing readiness drills and critical systems are operating properly. This inspection will occur prior to conducting OCS activities.

h. Random Examinations

Units will conduct additional random, unannounced examinations on 25% of their entire (priority and non-priority) fleet. For example, if a unit has 25 foreign flag MODUs operating in their zone then they should aim for conducting an additional 6 MODU examinations annually if unit resources allow.

i. Documentation of Foreign-Flagged MODU Exam Activities

1. MISLE. Immediately upon receipt of this policy and in order to increase consistency across the Coast Guard, all units conducting foreign-flagged MODU exams must use the enclosed *MISLE Data Entry Requirements for Foreign MODU Arrivals and Examinations* to accurately document MODU exams/activities within MISLE. **Of particular note-** units must enter all exam deficiencies, including those cleared on-site, into the MISLE activity. Deficiency MISLE entry must include the applicable regulatory cite the deficiency is based on and the date for required correction, or date it was corrected if corrected on the spot.
2. Reports of Inspection (Forms A and B). To increase standardization in MODU exam deficiency documentation across the Coast Guard, immediately upon receipt of this policy, all units conducting foreign-flagged MODU exams will issue U.S. Coast Guard

Report of Inspection Form A (CG-5437A) and Form B (CG-5437B) (if deficiencies found). Issuance of these forms to document foreign-flagged MODU exams is being incorporated into the upcoming revision of 33 CFR 140 – Subchapter N.

3. Issuance of COC. Once the Marine Inspector determines the foreign-flagged MODU is fit for its intended service, a Certificate of Compliance (Form CG-3585) will be issued. The MODU particulars must be indicated in the applicable section on the form.
4. Endorsement of COC. During the foreign-flagged MODUs required annual exam, once the Marine Inspector determines the unit to be fit for its intended service, the Certificate of Compliance (Form CG-3585) will be dated and endorsed with the attending Marine Inspector's signature in the appropriate block on page 1 of the form.
5. Non-issuance of COC. Units will notify CG-5432 via email (CG543@uscg.mil) when it is determined that a foreign-flagged MODU does not meet the applicable safety requirements warranting issuance of a COC (Form CG-3585). CG-5432 will enter a special note in MISLE regarding the specific deficiencies identified during the exam, and the reason for non-issuance of the COC. This special note will remain "active" and be reflected on the MODUs critical profile for a period of five years. Email to CG-543 should include, at a minimum, name of MODU, official number or IMO number, and MISLE activity number. Units should also scan Forms A & B in to MISLE and attach to the activity.
6. Revocation of COC. Units will notify CG-5432 via email (CG543@uscg.mil) when, after issuance of a COC (Form CG-3585), they determine that a foreign-flagged MODU no longer meets applicable safety requirements (i.e. during the required annual COC exam, deficiency check, etc). CG-5432 will enter a special note in MISLE regarding the specific deficiencies noted during the exam and the reason for COC revocation. This special note will remain "active" and be reflected on the MODUs critical profile for a period of five years. Email to CG-543 should include, at a minimum, name of MODU, official number or IMO number, and MISLE activity number. Units should also scan Forms A & B in to MISLE and attach to the activity.
7. Data Collection Criticality. To enable proper use of the MODU Safety and Environmental Protection Compliance Targeting Matrix, it is of paramount importance every unit responsible for conducting foreign-flagged MODUs accurately document all MODU exam information and enter this data in MISLE in accordance with this policy and the enclosed MODU MISLE Data Entry Work Instruction.
8. Access Control and Closure of Activities. A 2011 Office of the Inspector General (OIG) audit revealed that MISLE lacks sufficient internal controls to ensure accuracy and validity of data entered. To address this issue, Chiefs of the Inspection Department (CID) will review each activity for accuracy and compliance with Commandant, District and local unit administrative policies. Following appropriate review, CID's may close each activity.

j. Continuous Improvement

CG-543 reserves the right to review this process and scoring system periodically, providing adjustments and updates as necessary to ensure the program matures as necessary. Industry members and OCMI's are encouraged to provide suggestions and feedback via email to CG543@uscg.mil.

k. Disclaimer

This guidance is not a substitute for applicable legal requirements, nor is it itself a rule. It is not intended to nor does it impose legally-binding requirements on any party. It represents the Coast Guard's current guidance on this topic and is intended to assist industry and Coast Guard members in understand and applying statutory and regulatory requirements. Questions regarding this guidance may be directed to Commandant (CG-5432) at (202) 372-2267.

2 Enclosures

Mobile Offshore Drilling Unit (MODU) Safety and Environmental Protection Compliance Targeting Matrix

<i>I</i>	<i>II</i>	<i>III</i>	<i>IV</i>	<i>V</i>
MANAGEMENT	FLAG STATE	RECOGNIZED ORGANIZATIONS	MODU HISTORY	MODU PARTICULARS
5 POINTS Lessee, Owner, Operator, or Charterer	7 POINTS Flag State has a detention ratio 2 or more times the overall average for all flag States. 2 POINTS Flag State has a detention ratio between the overall average and up to 2 times the overall average for all flag States.	PRIORITY EXAMINATION Detention ratio equal to or greater than 2% 5 POINTS Detention ratio less than 2% but greater than or equal to 1% 3 POINTS Detention ratio less than 1% but greater than .5% NO POINTS Detention ratio less than .5%	PRIORITY EXAMINATION First time to U.S. or U.S. OCS or no Coast Guard examination in the previous 12 months 5 POINTS EACH Operational Control in the previous 12 months 1 POINT EACH Reportable marine casualty in the previous 12 months 1 POINT EACH Marine violation in the previous 12 months 1 POINT EACH Outstanding Deficiency	5 POINTS Self Propelled 3 POINTS Semi-Submersible 2 POINTS Jack-Up 1 POINT Submersible MODU AGE (USE DELIVERY DATE) 0-4 years - subtract 3 5-9 years - subtract 2 10-14 years - add 0 15-19 years - add 3 20-24 years - add 5 25+ years - add 7
Total Targeting Score (Sum of Columns I-V) determines vessels priority (Priority or Non-Priority)				

Priority MODU

12 or more points on the Matrix; MODUs involved in a marine casualty that may have affected seaworthiness; USCG Officer in Charge, Marine Inspection (OCMI) determines a MODU to be a potential hazard to the OCS, port or the environment; MODU's whose Recognized Organization (classification society) has a detention ratio equal to or greater than 2%. Port or OCS entry may be restricted until the Coast Guard examines the MODU.

Non-Priority MODU

11 or fewer points on the Matrix. MODU poses a low safety and environmental risk. The Coast Guard may select and examine MODU using a random selection process.

Downgrade Clause. If a MODU has undergone a Coast Guard Certificate of Compliance (COC) or a required COC annual exam within the past 6 months with no serious deficiencies, the OCMI may downgrade the MODU to non-priority. If the OCMI downgrades a MODU exam priority, it will be added to the pool of random examinations.

MISLE DATA ENTRY REQUIREMENTS FOR FOREIGN MODU ARRIVALS AND EXAMINATIONS

Objective:

This work instruction prescribes the administrative requirements and responsibilities to ensure uniformity of MISLE data entry that pertains to Mobile Offshore Drilling Unit (MODU) arrivals, examinations and operational controls. This instruction is not intended to provide detailed instruction on how to use MISLE, as the MISLEnet (<http://mislenet.osc.uscg.mil/>) website provides various user guides and “how to” tutorials.

Responsibilities:

This instruction applies to all USCG personnel entering data into or using MISLE for MODU arrivals and examinations.

Background:

Marine Information for Safety and Law Enforcement (MISLE) is used by all field units, districts, areas and headquarters offices as the primary data capture and information management tool for planning, scheduling, executing, monitoring and tracking all activities associated with foreign vessels. It also serves as the primary system for passing information to the Coast Guard Command Center for daily Commandant briefings, which are expected to portray an accurate nationwide snapshot of all key prevention activities. It is imperative that all MISLE data entries are entered in a timely, accurate, and consistent manner to prevent an erroneous common operational picture for the Commandant and other levels of the Coast Guard.

Actions:

Refer to the following sections for MISLE data entry requirements for MODU arrivals, examinations, and operational controls.

1. Creating an Arrival
2. Scheduling an Examination
3. Completing Activities in MISLE

Enclosure (1)

MISLE DATA ENTRY REQUIREMENTS FOR FOREIGN MODU ARRIVALS AND EXAMINATIONS

1. Creating an Arrival

- a) Arrival Report List Screen.
 - i. Units shall create a Port List for their respective Captain of the Port Zone (COTP) zone. Duplicate Port Lists that are not being used shall be deleted from MISLE to avoid confusion.
 - ii. Units shall check the Arrival Report List Screen at least twice a day for new arrivals or changes from previously validated lists.
- b) Update Arrival Status Screen.
 - iii. Units shall validate all MODUs listed in the Arrival Report List Screen at least once a day. Validation is completed by verifying the arrival status of the MODU – i.e. cancelled, not arrived, in port, or departed. The appropriate arrival status circle shall be checked as appropriate in the Update Arrival Status Screen.
 - iv. In addition, the MODU owner/ operator, flag, classification society and recognized security organization indicated in MISLE shall be cross checked with the information indicated in SANS to verify that any changes which have occurred are properly documented in MISLE. If there is a conflict, cross check with EQUASIS or have the MODU representative (Master, OIM, agent, etc) provide needed documentation to verify correct information. Update MISLE with the correct information.
 - v. Once a MODU has been validated, the unit shall check the “Arrival Validated” box in the “Update Arrival Status Screen”. Note that the arrival status for multiple arrival records may be updated at the same time, reducing the workload on the unit.

2. Scheduling the Examination

- a) Units shall schedule MODU exams in MISLE ahead of the actual exam. If the unit cancels an examination, the unit shall immediately delete the activity from MISLE selecting “Deleted – Inspection Canceled” from the Activity Status drop down box. The Activity shall be scheduled by clicking on the “Schedule Inspection” button from the “Arrival Report List” screen. If the activity is opened via the “Create New Activity” Screen, the “COC-MODU Annual/Renew” button shall be clicked to open the new activity.

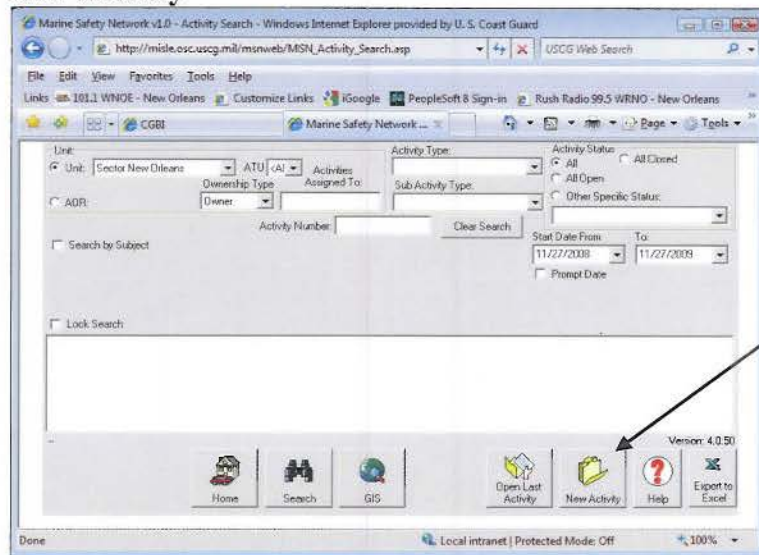
3. Completing Activities in MISLE

- a) Select the “Activities” button on the home page of MISLE.

MISLE DATA ENTRY REQUIREMENTS FOR FOREIGN MODU ARRIVALS AND EXAMINATIONS

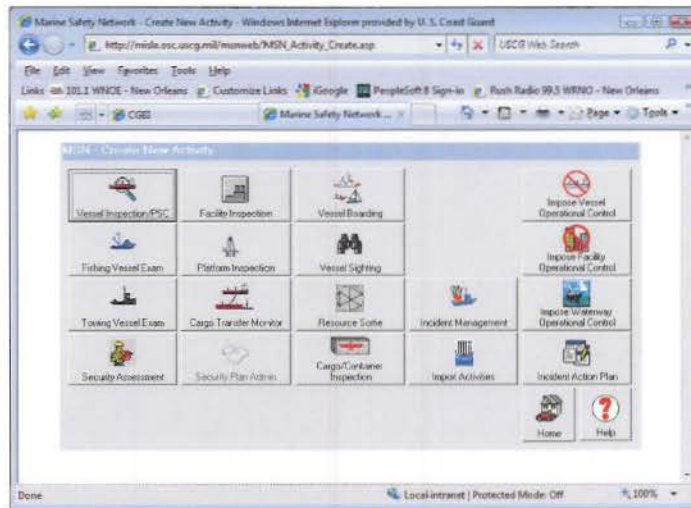


b) Select "New Activity"

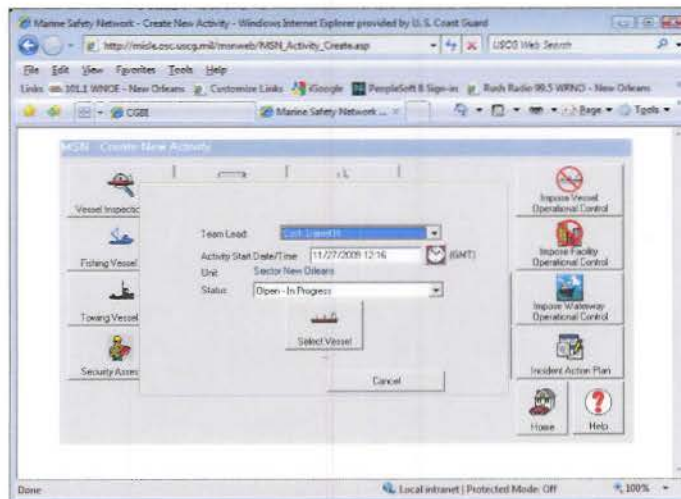


MISLE DATA ENTRY REQUIREMENTS FOR FOREIGN MODU ARRIVALS AND EXAMINATIONS

- c) Select “Vessel Inspection/PSC”



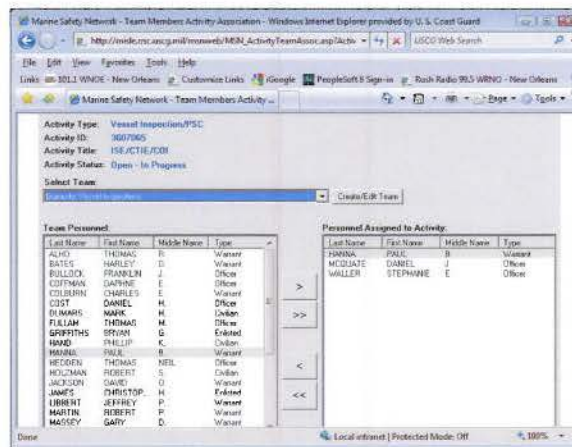
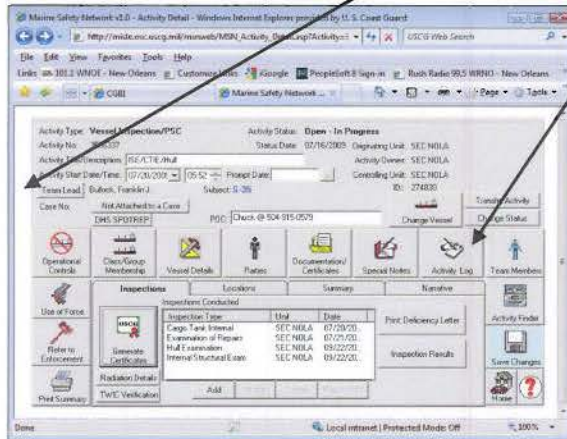
- d) Select “Select Vessel”



- e) Search MSN for vessel and select “Use Vessel”
- f) Select “Continue Creating Activity”
- g) Fill in the Activity Title/Description with the type of inspection to be conducted.

MISLE DATA ENTRY REQUIREMENTS FOR FOREIGN MODU ARRIVALS AND EXAMINATIONS

h) Add Inspection Members (“Team Lead” and “Team Members” Tabs)

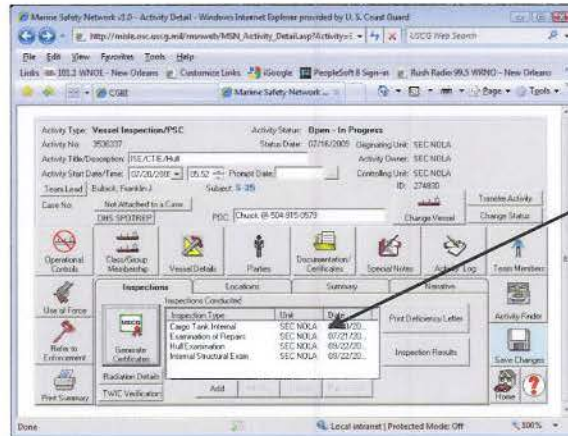


i) Fill out the POC’s name and number (including area code)

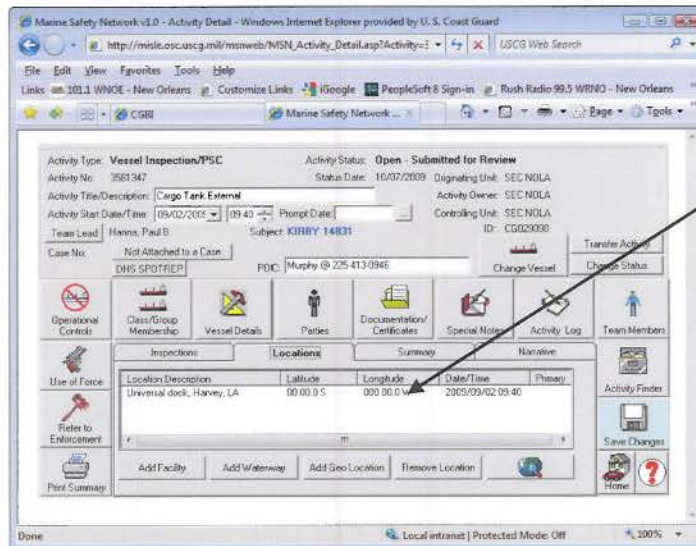


MISLE DATA ENTRY REQUIREMENTS FOR FOREIGN MODU ARRIVALS AND EXAMINATIONS

- j) Under the “**Inspections**” tab, Click the **Add** button and add each type of inspection conducted.
- i. COC - MODU Annual/Renew
 - ii. Add deficiency checks for any follow-up on Form B deficiencies.
 - iii. Record an Admin Inspection every time administrative issues are addressed in the field or at the office.

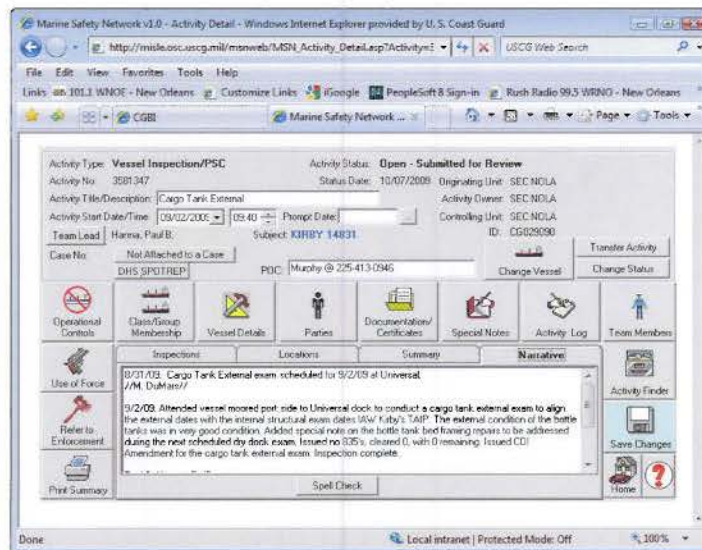


- k) Under the “**Location**” tab, select “**Add Geo Location.**” This location should be the lease location on the Outer Continental Shelf (OCS).



MISLE DATA ENTRY REQUIREMENTS FOR FOREIGN MODU ARRIVALS AND EXAMINATIONS

- l) Under the “**Narrative**” tab, write your narrative of the inspection. The narrative should contain the information not found in the “**Inspection Results**” tab or Activity screen (e.g., repair information, work list items, or work completed over a multi-visit inspection including the dates of each visit. Narratives should be written clearly so that those not attending the activity understand what happened and why. Changes that affect the COC need to be clearly explained (i.e. manning, lifesaving, etc). Deficiencies need not be listed in the narrative. The narrative should also include but is not limited to: drills conducted, documents issued or removed, amendments issued, and number of deficiencies issued/remain outstanding. Also, a descriptive explanation of what was done or what wasn’t done (i.e. drills), what pumps were tested, what doors were examined and what fire/gas sensors were tested.
- m) Include any details that may add clarification to decisions made. Upon completion of the day’s inspection, write "Inspection continues" or "Inspection complete" followed by the inspectors’ name who wrote the narrative.



MISLE DATA ENTRY REQUIREMENTS FOR FOREIGN MODU ARRIVALS AND EXAMINATIONS

- n) Select the “**Inspections**” tab and then select “**Inspection Results.**”
 - i. Add all deficiencies that were identified during the inspection by selecting the relevant tab, selecting “**Inspected with Defs Noted**”, select “**Add**” and enter in the deficiency information to include regulatory cite.
 - ii. If there are no deficiencies in a certain category, indicate it as **Inspected Satisfactory**. Save and Close the deficiency window.

Marine Safety Network v1.0 - Activity Detail - Windows Internet Explorer provided by U. S. Coast Guard

http://misle.uscg.mil/msnweb/MSN_Activity_Detail.asp?Activity=: USCG Web Search

File Edit View Favorites Tools Help

Links 101.1 WNDE - New Orleans Customize Links iGoogle PeopleSoft 8 Sign-in Rush Radio 99.5 WRNO - New Orleans

CGBI Marine Safety Network

Activity Type: **Vessel Inspection/PSC** Activity Status: **Open - Submitted for Review**

Activity No: 3581347 Status Date: 10/07/2009 Designing Unit: SEC NOLA

Activity Title/Description: Cargo Tank External Activity Owner: SEC NOLA

Activity Start Date/Time: 09/02/2009 09:40 Prompt Date: Controlling Unit: SEC NOLA

Team Lead: Hanna, Paul B. Subject: KIRBY 14831 ID: CG029090

Case No: Not Attached to a Case POC: Murphy @ 225-413-0946

Operational Controls Class/Group Membership Vessel Details Parties Documentation/Certificates Special Notes Activity Log Team Members

Use of Force Generate Certificates Refer to Enforcement Pleadings Details TWC Verification

Inspections Locations Summary Narrative

Inspection Type	Unit	Date
In-Service Inspection	SEC NOLA	09/02/2009

Part Deficiency Letter Inspection Results Save Changes Home

Done Local intranet | Protected Mode: Off 100%

Marine Safety Network v1.0 - Inspection Results -- Webpage Dialog

Vessel Name: KIRBY 14831 Inspection Date: 09/02/2009 Activity ID: 3581347

Operations/Management Personnel Pollution Prevention/Response Stability Summary

Electrical Engineering Fire Fighting Fisheries Lifesaving Navigation

Accommodation/Occupational Safety Communications Construction/Loadline **Deficiencies** Documentation

Inspected Satisfactory Date: 09/02/2009 Inspected with Deficiencies Noted Incomplete Inspection Not Inspected

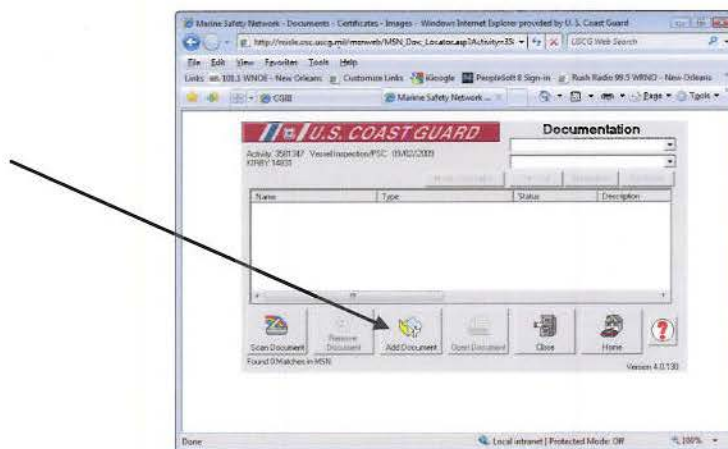
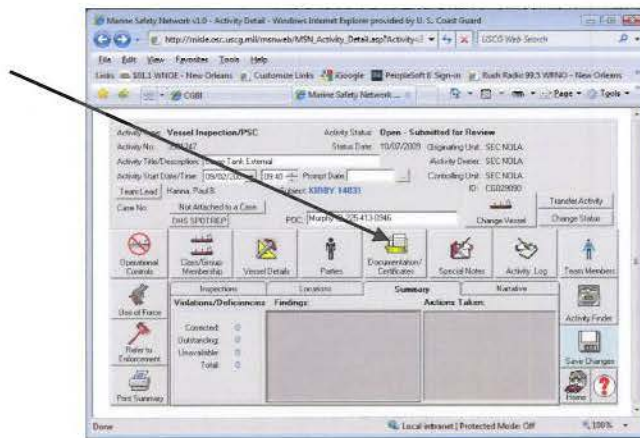
Deficiencies Items Available for Inspection

Include Deficiency History Show Security Items Only Save Inspection Results Close Legend

http://misle.uscg.mil/msnweb/MSN_Inspection_Results.asp?Activity=:3581347 Local intranet | Protected Mode: Off

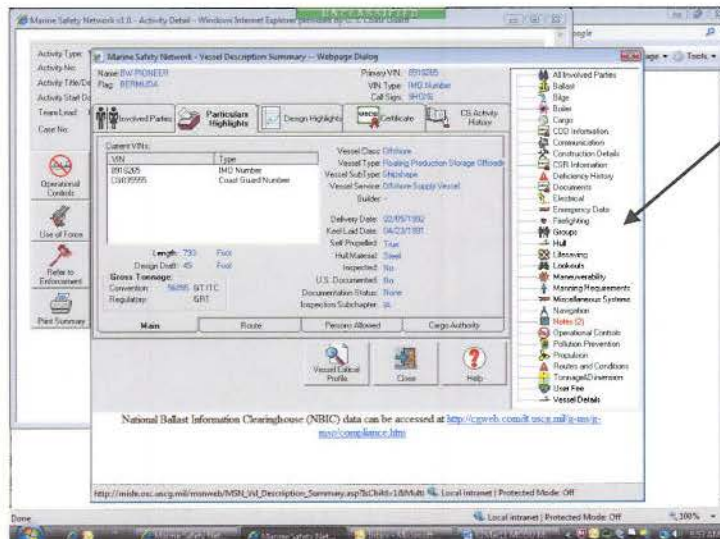
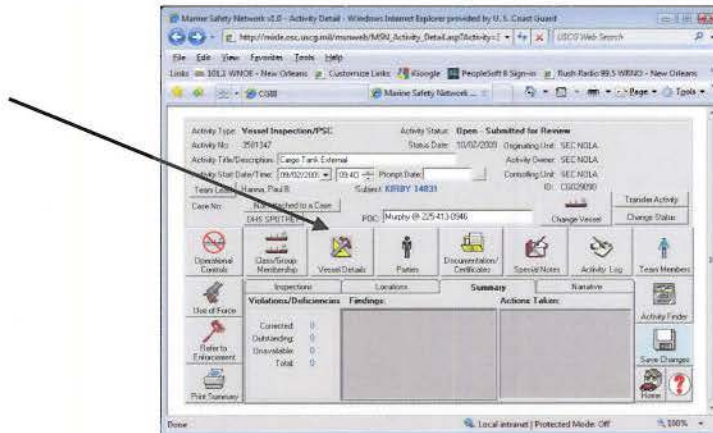
MISLE DATA ENTRY REQUIREMENTS FOR FOREIGN MODU ARRIVALS AND EXAMINATIONS

- o) Adding item to “**Documents**” tab:
 - i. Select “**Documents/Certificates**” button on the main activity page.
 - ii. Select “**Add Document**”
 - iii. Select “**New Document**”
 - iv. Find and Select the document that was scanned in and saved. Select “**Open.**”
 - v. In the drop down menu to the right of where the title of the new document appears, select the appropriate type of document. Some types of documents will require additional information, when this window opens, fill in all blocks that apply. Note: Indicate which documents are valid in this window. Select “**Save.**”
 - vi. Select “**Close.**”



MISLE DATA ENTRY REQUIREMENTS FOR FOREIGN MODU ARRIVALS AND EXAMINATIONS

- p) Select “**Vessel Details**” button on the main activity page. Review all applicable windows to the right and update changes or items not present in MISLE (owner/operator, lease, propulsion details, etc).



MISLE DATA ENTRY REQUIREMENTS FOR FOREIGN MODU ARRIVALS AND EXAMINATIONS

i. Updating MODU Details

Units shall update and verify vessel details upon completion of every examination. Below is the minimum information that shall be entered in MISLE for every MODU:

Name	Hull Design Type
Flag	Owner
Primary VIN and Type	Operator
Call Sign	Inspected (COI or COC)
Vessel Class	Inspection Subchapter (N, I-A, etc.)
Vessel Type	Classification Society
Vessel SubType	Superstructure Color
Vessel Service	Hull Color
Delivery Date	Home Port
Length (in feet)	Draft
Gross Tonnage (Convention & Regulatory)	Self Propelled (verify according to Class Documents – Safe Manning)

ii. Recognized Organization (RO) and Recognized Security Organization (RSO)

Units shall associate the RO and RSO for each MODU arrival/movement by adding the RSO/RO to MISLE as an Involved Party. Units shall not create a new RO/RSO in MISLE, but should select from the pick lists entered by CG-5432. If a RO/RSO is not listed, contact CG-5432. Note: The RO is referred to as the Classification Society in MISLE.

iii. Documents and Certificates

The following documents should be **scanned and attached to the documents section** in MISLE :

- a) Classification Document
- b) MODU Safety Certificate
- c) Safety Construction Certificate
- d) Safety Equipment Certificate
- e) Safety Radio Telephone Certificate
- f) International Loadline Certificate
- g) International Tonnage Certificate
- h) International Oil Pollution Prevention Certificate
- i) ISM Document of Compliance
- j) ISM Safety Management Certificate

MISLE DATA ENTRY REQUIREMENTS FOR FOREIGN MODU ARRIVALS AND EXAMINATIONS

- k) Certificate of Registry
- l) Continuous Synopsis Record
- m) International Ship Security Certificate
- n) Safe Manning Document
- o) USCG Certificate of Compliance
- p) Coast Guard Letters pertaining to the MODU (i.e. approvals, dry-dock extensions, loadline exemptions, etc.)

iv. Inspection Results/Requirements

- a) U.S. Coast Guard Report of Inspection Form A (CG-5437A) and Form B (CG-5437B) must be used to document Examinations (A) and any deficiencies found (B).

- b) All deficiencies should be written in complete sentences and must be clear and have an associated regulatory cite (i.e. CFR, SOLAS, MODU Code, etc). Sample deficiency write-up:

3050 (deficiency code) – Access Control (deficiency category) - Failed to control access to MODU in contradiction to the SSP as verified by Flag or RSO (description). MODU personnel did not conduct identification checks of PSCO or cargo handling personnel. Function not delegated to facility in Declaration of Security (objective evidence) - ISPS Part A, 7.2.2

- c) Deficiencies require action and should read that way. It is recommended that you do not include more than two requirements in a single deficiency. Compliance dates are typically no longer than 30 days; however, this is at the discretion of the Office in Charge, Marine Inspection (OCMI).
- d) If the deficiency is due prior to engaging in OCS activities, the due date shall be the day prior to anticipated start of OCS activities.
- e) If a deficiency leads to an operational control (i.e. Suspension, Non Issuance of COC, reduction of any of the MODU's capabilities), the due date shall be the same day it was issued.

MISLE DATA ENTRY REQUIREMENTS FOR FOREIGN MODU ARRIVALS AND EXAMINATIONS

f) Once the deficiency has been resolved/ cleared, units shall provide a brief description of the corrective actions taken to resolve the deficiency. Also indicate in the narrative if flag, RO/RSO, or tech reports indicating the corrective action were received. Any photographs, tech reports, flag/class reports, etc are to be scanned in to MISLE to be part of the MODU's official record.

Enclosure (1)