



Marine Safety Center Technical Note

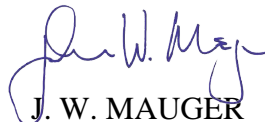
MTN 01-95, CH-2
16703/46 CFR 170.255
16703/46 CFR 179.330
January 11, 2016

Subj: PERMISSIBLE LOCATIONS OF CLASS 1 WATERTIGHT DOORS (WTD)

1. Purpose: This updated Marine Technical Note (MTN) provides guidance on regulations and policy governing the placement of Class 1 watertight doors. Change 2 (CH-2) incorporates a clarification regarding the existing route restriction applicable to Subchapter T and K vessels fitted with Class 1 WTDs and a regulatory change applicable to Subchapter T passenger vessels which was introduced by the 1996 update to 46 CFR Subchapter T.
2. Applicability: This technical note applies to U. S. flagged vessels, not employed in the offshore oil industry trade, and subject to 46 CFR 170.255 or 46 CFR 179.330.
3. Action:
 - a. In general, the use of Class 1 WTDs below the waterline is not authorized unless the conditions described in enclosure (1) or (2) have been met. Historically, doors separating machinery spaces from accommodation or working spaces have been approved provided that the doors remain closed except when they are in use. Typically, where enclosure (1) or (2) indicates that a Class 1 WTD is permissible, the door is considered to be located where it will normally be kept closed. However, the cognizant Officer in Charge, Marine Inspection (OCMI) may disallow the use of a Class 1 WTD, in accordance with 46 CFR 170.255(b)(1) or 46 CFR 179.330(a)(1), even if all of the conditions of enclosures (1) or (2) are satisfied, where it is determined that, due to the service of the vessel or the nature of the spaces involved, the door is unlikely to be kept closed. While final approval for Class 1 WTD installations resides with the OCMI or the Commandant (CG-CVC-1) as discussed in 46 CFR 179.330(a)(2), the Marine Safety Center will make a preliminary determination.
 - b. Enclosure (1) is a flow chart to be used when evaluating watertight door locations for all vessels except Subchapter T and K vessels. Enclosure (2) applies to Subchapter T and K vessels. The following specific considerations relate to the application of enclosure (2):
 - (1) Enclosure (2) is applicable only to Subchapter T and K vessels restricted to operation within 20 nautical miles (nm) from shore. Subchapter T and K vessels operating more than 20 nm from shore are prohibited from being fitted with Class 1 WTDs. Enclosure (2) is applicable to all vessels built new or converted to Subchapter T or K after February 1, 1990, including those vessels previously operating in the offshore oil industry trade, and to all vessels built new or converted to Subchapter T prior to February 1, 1990 which have undergone a major modification, increase in passenger capacity or upgrade in route since that date.

Subj: PERMISSIBLE LOCATIONS OF CLASS 1 WATERTIGHT DOORS

- (2) On 'new' Subchapter T vessels, Class 1 watertight doors will be allowed in subdivision bulkheads only in those locations where the bulkhead separates a machinery space and an accommodation space. On all other vessels, Class 1 watertight doors will be allowed in subdivision bulkheads only in those locations where the bulkhead separates a machinery space and a galley, or accommodation spaces.
 - (3) Watertight doors will not be allowed in watertight bulkheads that separate two machinery spaces or a machinery space from a work space. Prior to a change of employment to traditional passenger vessel service, vessels engaged in the offshore oil industry trade will be required to remove all watertight doors that do not meet the criteria specified above. The installation of warning lights or signs on the bridge under the provisions of 46 CFR 170.255(e) will not be accepted as a factor to allow watertight doors between prohibited spaces.
 - c. Definitions for use when applying enclosures (1) and (2) are provided in enclosure (3).
 - d. Nothing in this MTN addresses or effects the requirements of 46 CFR 170.255 (c) - (e).
4. Disclaimer: While the guidance contained in this document may assist the industry, the public, the Coast Guard, and other Federal and State agencies in applying statutory and regulatory requirements, this guidance is not a substitute for the applicable legal requirements, nor is it in itself a regulation. It is not intended to, nor does it impose legally binding requirements on any party, including the Coast Guard, other Federal agencies, the States, or the regulated community.



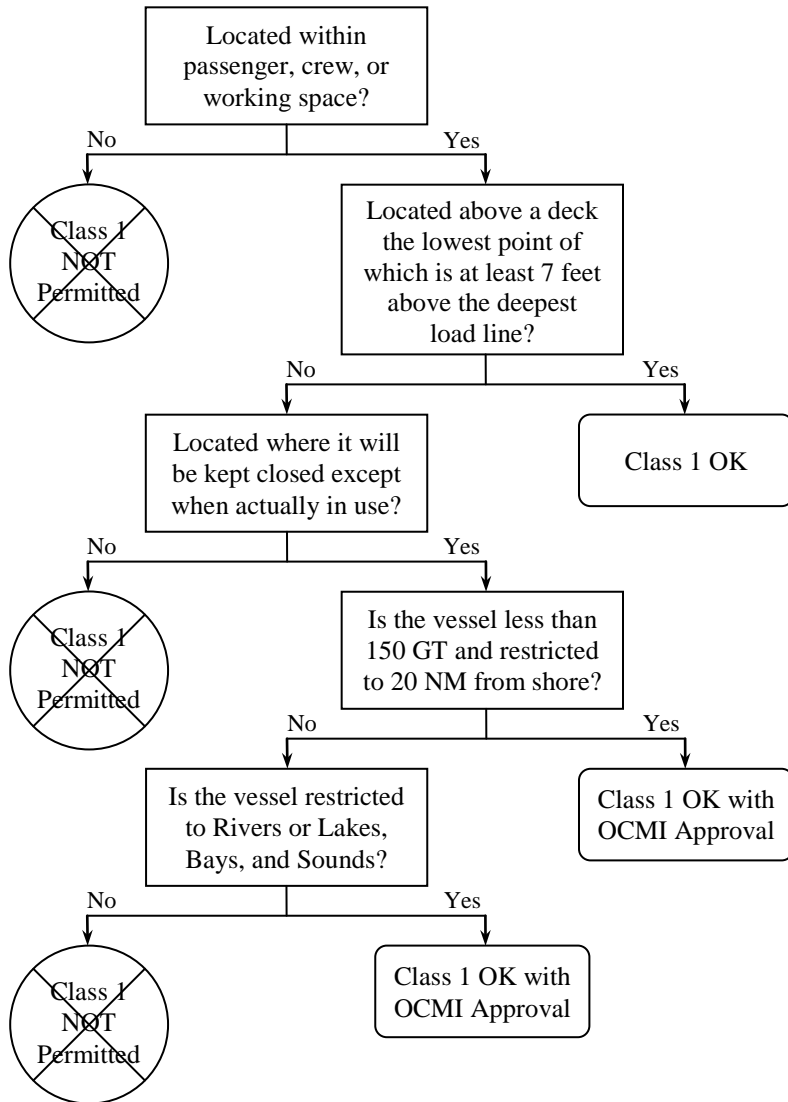
J. W. MAUGER

Encl: (1) Flowchart for Vessels Other than Subchapter T and K Vessels
(2) Flowchart for Subchapter T and K Vessels
(3) Definitions for Use When Applying This Technical Note

Copy: Commandant (CG-ENG), Office of Design and Engineering Standards
Commandant (CG-CVC), Office of Commercial Vessel Compliance

Subj: PERMISSIBLE LOCATIONS OF CLASS 1 WATERTIGHT DOORS

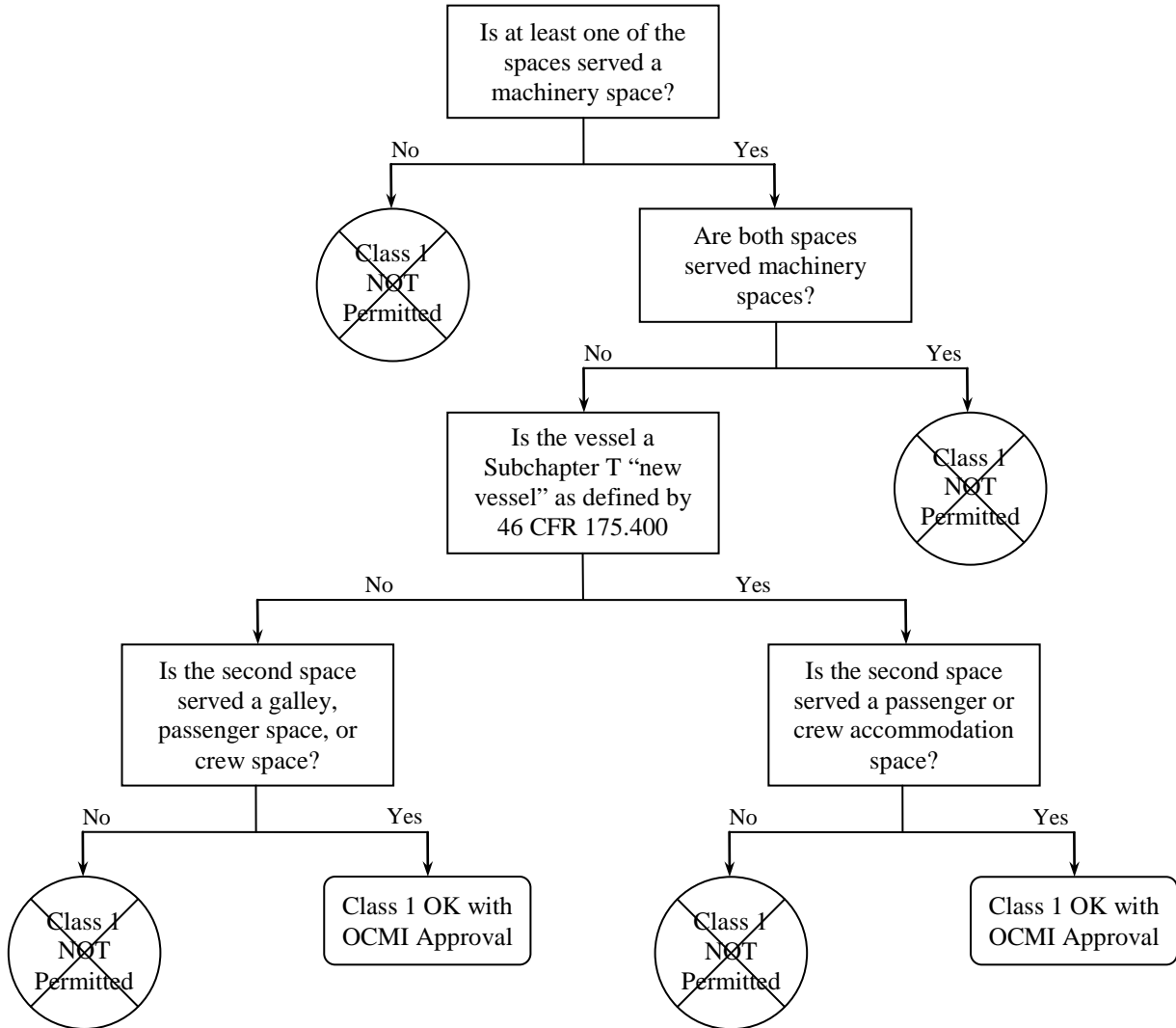
Permissible Class 1 Watertight Door Location Flow Chart
(All vessels except Subchapter T and K vessels)



Note: 46 CFR 170.255(d) allows Quick Acting Class 1 Watertight Doors in any location on a vessel which operates on the Great Lakes and is required to meet the damage stability standards of 46 CFR 172, Subpart H (Special Rules Pertaining to Great Lakes Dry Bulk Cargo Vessels).

Subj: PERMISSIBLE LOCATIONS OF CLASS 1 WATERTIGHT DOORS

Permissible Class 1 Watertight Door Location Flow Chart
(Where it Will be Normally Kept Closed)
(Subchapter T and K vessels operating not more than 20 nm from shore)



Subj: PERMISSIBLE LOCATIONS OF CLASS 1 WATERTIGHT DOORS

Definitions For Use When Applying MTN 01-95, CH-2

1. Located Within - At least one of the spaces served is a passenger, crew, or working space.
2. Passenger Space - (46 CFR 171.010(j)) - Spaces which are provided for the accommodation and use of passengers, other than baggage, store, provision, or mail rooms.
3. Crew Space - (46 CFR 72.50-5(c)) - Sleeping rooms, messrooms, recreational rooms, toilet and shower spaces, etc., which are intended for the exclusive use of the crew.
4. Machinery Space - (46 CFR 171.010(h)) - Spaces containing main and auxiliary propelling machinery, propulsion boilers, or permanent coal bunkers. Auxiliary spaces containing only HVAC equipment, compressors, water heaters, refrigeration units, thrusters, and other auxiliary machinery are not considered machinery spaces.
5. Working Space - (46 CFR 72.05-5(j)) - Only those service and machinery spaces where personnel are normally employed. Does not include those spaces where personnel may occasionally visit or be employed for short periods of times.
6. New Vessel – (46 CFR 175.400) - A vessel for which initial construction began or a major conversion was initiated on or after March 11, 1996 or which was issued an initial Certificate of Inspection (COI) or an amended COI after completing a major conversion on or after September 11, 1996.
7. Accommodation Space - (46 CFR 175.400) - Spaces (including spaces that contain a microwave oven or other low heat appliance with a maximum heating element temperature of less than 121°C (250°F)) appliance used by passengers or crew as a public space, hall, dining room or messroom, lounge or café, public sales room, overnight accommodation space, barber shop or beauty parlor, office or conference room; washroom or toilet space, medical treatment room or dispensary, game or hobby room.