

NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 10-92, CHANGE 1

Subj: COAST GUARD RECOGNITION OF REGISTERED PROFESSIONAL ENGINEER
CERTIFICATION OF COMPLIANCE WITH COAST GUARD REQUIREMENTS

1. PURPOSE. The purpose of this Circular is to publish policy concerning the approval of vessel plans and design calculations which bear a registered professional engineer's (PE) certification of compliance with Coast Guard requirements. The current version, Change 1, incorporates the recent policy change which affords the same recognition to certain American Bureau of Shipping (ABS) stamped plans as is afforded plans stamped by a PE.
2. DIRECTIVES AFFECTED. Navigation and Vessel Inspection Circular 10-92, dated 5 October 1992, is hereby superseded.
3. BACKGROUND.
 - a. Coast Guard functions related to the review and approval of commercial vessel plans and design calculations were consolidated at the Marine Safety Center (MSC) in Washington, DC in 1986. Previously, these functions were performed by technically trained staffs at the Third, Eighth and Twelfth District Marine Safety Divisions. This centralization has been successful, enabling the Coast Guard to ensure a more uniform application of regulations and policy while administering the marine technical responsibilities of the Commercial Vessel Safety Program with fewer personnel than were previously required.
 - b. In its implementation of Total Quality Management, the Coast Guard is exploring new methods to improve the way we do business. Some time spent by MSC personnel conducting routine plan review could be better spent on non-routine matters that have greater potential to improve marine safety. Many man-hours are spent reviewing some types of plans, only to find that the submitted documents fully or substantially comply with all applicable Coast Guard requirements. The submittal of plans bearing the certification of a PE or a duly authorized ABS employee will help the Coast Guard process routine plans in a more timely fashion while permitting increased emphasis on plan review activities that have the greatest impact on safety and on review of novel vessel designs having more critical safety features. Additionally, the Coast Guard believes that plans that have been reviewed by a PE or a duly authorized ABS employee prior to submittal are more likely to be in compliance with applicable regulations. Thus, the plan review function should take less time and result in fewer comments and corrections by the technical staff of the MSC.

4. DISCUSSION.

- a. In order to permit a reallocation of some manpower -resources to those areas having the greatest potential for improving marine safety, the Coast Guard is undertaking initiatives which will reduce existing work loads without negative affects. One method of freeing up limited MSC resources and improving plan review response time is to reduce or eliminate Coast Guard review of those items for which detailed plan review rarely uncovers significant safety related problems and for which the problems typically found have minimal impact on the overall safety of a vessel. To the greatest degree possible, the Coast Guard intends to place the responsibility for compliance with federal requirements on the marine industry, where it belongs. With respect to vessel plan review, this will entail placing increased reliance on the plan submitter to ensure that designs meet or exceed minimum regulatory requirements.
- b. Because plans certified by a PE or a duly authorized ABS employee are expected to have fewer areas of noncompliance with the applicable regulations, the Coast Guard expects these plans to be returned with a minimum of comments and, in many instances, with only oversight type review. Thus, it is expected that this process will result in a significant reduction in plan review turn around time. To ensure that the Coast Guard's safety concerns are being adequately addressed, the MSC will conduct oversight on a portion of the plans submitted under the provisions of this Circular. The level of oversight review performed on any given type of plan or calculation will vary depending on the nature of the material presented, the frequency of error routinely detected during plan review, and the impact such errors have on overall vessel safety.

5. IMPLEMENTATION.

- a. Application of this new program is limited to those plans submitted to the MSC for review. The Commanding Officer, MSC may accept, as the basis for plan approval, the certification of a registered PE or a duly authorized ABS employee that vessel plans, designs, calculations, etc. meet applicable Coast Guard requirements. The MSC may conduct full, partial, or no review of any or all documents submitted under the provisions of this Circular. The level of plan review oversight conducted will be determined by the Commanding Officer, MSC.
- b. Plans and design calculations submitted to the MSC for approval under the provisions of this Circular must be reviewed by a registered PE licensed by one of the 50 states of the United States or the District of Columbia, or by a full time employee of ABS who has conducted the review at one of the following sites: ABS Corporate (New York, NY), ABS Americas (Houston, TX), ABS Americas (New Orleans, LA), ABS Americas (Cleveland, OH), ABS Americas (Fort Lauderdale, FL), or ABS Americas (Washington, DC). It is the responsibility of the PE to ensure that he or she does not exceed the scope of his or her PE license. In the case of certifications by ABS employees, it shall be the responsibility of the ABS to ensure the reviewer holds proper ABS qualifications for the particular type of review being conducted.

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- c. The PE or ABS certification may appear either on the certified document itself, or in a cover letter. In either case, the certification must be accompanied by the signed and dated seal/stamp of either the PE or ABS, respectively. There are no requirements as to the specific wording which must be used in making the certification. However, the certification must indicate that the PE or duly authorized ABS employee has reviewed the document and certifies that the information contained therein is in compliance with the specified Coast Guard regulations. The following is an example of an acceptable form for the certification statement:

The information contained in this plan (drawing, calculation, document, etc.) has been reviewed and is certified as complying with the following U.S. Coast Guard regulations: 46 CFR Parts 30 through 40.

- d. If the certification statement is contained in a cover letter, the letter must also include a list of all applicable plans by number, title and revision/alteration.
- e. The certification may be made on a sepia or original drawing, provided the date of certification is also included. Blueprints made from a certified sepia or original drawing are acceptable provided the copy of the certification is legible. An original signature, certification and seal/stamp will not be required on copies of each plan; however, if the certification is done with a raised seal on an original plan (sepia, etc.), the information contained thereon must also be reproducible on all copies.
- f. Coast Guard requirements for commercial vessels are contained in Titles 33 and 46 of the Code of Federal Regulations. Further guidance on Coast Guard requirements is published in Coast Guard Marine Safety Manual Volumes II (Material Inspection) and IV (Technical) and in various NVIC's. Copies of the Marine Safety Manual may be obtained for a fee from the U.S. Government Printing Office at the following address:

Superintendent of Documents
U.S. Government Printing Office
Washington, DC 20402

Telephone: (202) 783-3238

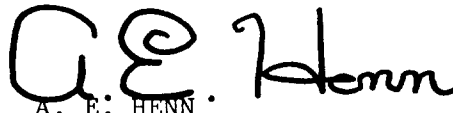
An updated listing and index of effective NVIC's is published annually. Current calendar year NVIC's may be obtained for a fee from the U.S. Government Printing Office at the following address:

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- g. Under this program, many plans and calculations approved based on certifications made in accordance with the provisions of this Circular will not have received full review at the MSC. Thus, it is recognized that some previously detected errors will no longer be specifically pointed out to the submitter and the cognizant Officer in Charge, Marine Inspection (OCMI). This fact shall in no way limit the authority of the cognizant OCMI to require correction of material, design, equipment, construction, installation, etc. that are found not to be in compliance with Coast Guard requirements. Nor does it lessen or remove the obligation of the designer, owner, or builder, to design and construct the vessel in accordance with all applicable regulations.

A handwritten signature in black ink that reads "A. E. HENN". The letters are cursive and somewhat stylized, with the first letters being larger and more prominent.

A. E. HENN

Rear Admiral, U.S. Coast Guard
Chief, Office of Marine Safety,
Security and Environmental Protection