

DEEPWATER HORIZON – VESSEL SAFETY IMPROVEMENTS (last updated 7.31.23)

#	Recommendation	USCG Final Action Memo	Status
1A	It is recommended that Commandant work with the IMO to amend the MODU Code to include clear requirements for the long-term labeling and control of all electrical equipment in hazardous areas. In addition, requirements should be established for the continued inspection, repair, and maintenance of electrical equipment in hazardous areas in the unit's safety management system.	Concur with the intent of this recommendation	3/31/15 Federal Register Docket USCG-2012-0850 Electrical Equipment in Hazardous Locations – Final Rule 6/9/17 IMO Resolution MSC.435(98) Amendments to the Code for the Construction and Equipment of Mobile Offshore Drilling Units, 2009 (2009 MODU Code)
1B	It is recommended that Commandant work with the IMO to amend the MODU Code to provide more detailed guidance for the design and arrangement of fixed automatic gas detection and alarm systems as specified in paragraph 9.8 of the MODU Code (paragraph 9.11). The guidelines should include as a minimum, the recommended type and number of gas detectors, their arrangement, alarm set points, response times, wiring protocols and survivability requirements.	Do not concur with this recommendation	NA
1C	It is recommended that Commandant work with the IMO to amend the MODU Code to provide more detailed guidance for establishing fire and explosion strategies on board units using dynamic positioning systems for station keeping. The guidelines should provide a hierarchy of recommended automatic and manual emergency shutdown actions following gas detection in vital areas. The guidelines should also provide accepted approaches for the design and arrangement of the emergency power source necessary for station keeping in the event of a flammable gas release.	Concur with the intent of this recommendation	11/28/14 Federal Register / Vol. 79, No. 229 Requirements for MODUs and Other Vessels Conducting Outer Continental Shelf Activities With Dynamic Positioning Systems – Notice of proposed rulemaking 6/9/17 IMO Resolution MSC.435(98) Amendments to the Code for the Construction and Equipment of Mobile Offshore Drilling Units, 2009 (2009 MODU Code)

DEEPWATER HORIZON – VESSEL SAFETY IMPROVEMENTS (last updated 7.31.23)

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1D	It is recommended that Commandant work with the IMO to amend the MODU Code to require specific minimum values for explosion design loads to be used in calculating the required blast resistance of structures. In addition, unified guidelines for performing the required blast resistance calculations should be developed.	Concur with the intent of this recommendation	5/2/14 Federal Register / Vol. 79, No. 85 Outer Continental Shelf Units—Fire and Explosion Analyses – Notice of recommended interim voluntary guidelines. 6/9/17 IMO Resolution MSC.435(98) Amendments to the Code for the Construction and Equipment of Mobile Offshore Drilling Units, 2009 (2009 MODU Code)
1E	It is recommended that Commandant work with the IMO to amend the MODU Code to require an explosion risk analysis of the design and layout of each facility. The analysis should use accidental blast loads defined by the Organization, to determine whether the levels of protection for accommodation areas, escape paths and embarkation stations provided by the prescriptive requirements in the Code are adequate.	Concur with the intent of this recommendation	5/2/14 Federal Register / Vol. 79, No. 85 Outer Continental Shelf Units—Fire and Explosion Analyses – Notice of recommended interim voluntary guidelines. 6/9/17 IMO Resolution MSC.435(98) Amendments to the Code for the Construction and Equipment of Mobile Offshore Drilling Units, 2009 (2009 MODU Code)
1F	It is recommended that Commandant work with the IMO to amend the MODU Code to require ventilation inlets for machinery spaces containing primary and emergency sources of power to be located as far as practicable from hazardous locations.	Concur with the intent of this recommendation	
1G	It is recommended that Commandant prepare and submit a "lessons learned" information paper to the IMO strongly recommending that existing facilities reevaluate the placement of supply air intakes for main and emergency power sources, coordinated with the fire and gas detection system logic. The paper should recommend that training, policies, and procedures are implemented to shut down	Do not concur with this recommendation	NA

DEEPWATER HORIZON – VESSEL SAFETY IMPROVEMENTS (last updated 7.31.23)

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	ventilation systems and close dampers in the event flammable gas is detected in critical locations.		
1H	It is recommended that Commandant pursue the regulatory changes for dynamic positioned vessels recommended in Appendix I, including clear designation of the person in charge under both operating and emergency conditions for all MODUs operating on the U.S. OCS.	Concur with this recommendation	11/28/14 Federal Register / Vol. 79, No. 229 Requirements for MODUs and Other Vessels Conducting Outer Continental Shelf Activities With Dynamic Positioning Systems – Notice of proposed rulemaking 6/9/17 IMO Resolution MSC.435(98) Amendments to the Code for the Construction and Equipment of Mobile Offshore Drilling Units, 2009 (2009 MODU Code)
1I	It is recommended that Commandant work with the IMO to evaluate the need to create a requirement for flag states to audit classification societies acting on their behalf as a recognized organization.	Concur with the intent of this recommendation	5/17/13 Resolution MEPC.237(65) Code for Recognized Organizations (RO Code)
1J	It is recommended that Commandant evaluate the need to establish unannounced regulatory inspections.	Concur with the intent of this recommendation	6/8/11 Coast Guard CG-543 Policy Letter 11-06 Risk-Based Targeting of Foreign Flagged Mobile Offshore Units (MODUs)
1K	It is recommended that Commandant work with Recognized Organizations to evaluate the need to create a complete stand-alone regulatory check list that does not rely on the result of other surveys to ensure a 100% regulatory check of the MODU.	Do not concur with this recommendation	NA
1L	It is recommended that Commandant evaluate the need for improving inspection guidance documents and case work entry standards to ensure the proper documentation of Certificate of Compliance examinations.	Concur with this recommendation	Internal Coast Guard Process Improvement, e.g., MISLE INSPECT project

DEEPWATER HORIZON – VESSEL SAFETY IMPROVEMENTS (last updated 7.31.23)

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2A	It is recommended that Commandant work with the IMO to amend the MODU Code to require that fire pump systems should be self-contained and depend on no other onboard systems. This should include dedicated fuel supplies for at least 18 hours of operation.	Do not concur with this recommendation	NA
2B	It is recommended that Commandant work with the IMO to amend the MODU Code to require H-60 fire separations between the drilling area and adjacent accommodation spaces as well as any spaces housing vital safety equipment.	Concur with the intent of this recommendation	<p>5/2/14 Federal Register / Vol. 79, No. 85 Outer Continental Shelf Units—Fire and Explosion Analyses – Notice of recommended interim voluntary guidelines.</p> <p>6/9/17 IMO Resolution MSC.435(98) Amendments to the Code for the Construction and Equipment of Mobile Offshore Drilling Units, 2009 (2009 MODU Code)</p>
2C	It is recommended that Commandant work with the IMO to amend the MODU Code to develop uniform guidelines that can be used as a basis for performing engineering evaluations to ensure that the level of fire protection of the bulkheads and decks separating hazardous areas from adjacent structures and escape routes is adequate for likely drill floor fire scenarios.	Concur with the intent of this recommendation	<p>5/2/14 Federal Register / Vol. 79, No. 85 Outer Continental Shelf Units—Fire and Explosion Analyses – Notice of recommended interim voluntary guidelines.</p> <p>6/9/17 IMO Resolution MSC.435(98) Amendments to the Code for the Construction and Equipment of Mobile Offshore Drilling Units, 2009 (2009 MODU Code)</p>
2D	It is recommended that Commandant work with the IMO to amend the MODU Code to require a fixed deluge system or multiple high-capacity water monitors for the protection of the drill floor and adjacent areas. Consideration should be given to requiring automatic operation upon gas detection.	Concur with the intent of this recommendation	<p>Federal Register / Vol. 77, No. 226 Lifesaving and Fire-Fighting Equipment, Training and Drills Onboard Offshore Facilities and Mobile Offshore Drilling Units (MODUs) Operating on the U.S. Outer Continental Shelf (OCS) – Recommended Interim Voluntary Guidance</p> <p>6/9/17 IMO Resolution MSC.435(98) Amendments to</p>

DEEPWATER HORIZON – VESSEL SAFETY IMPROVEMENTS (last updated 7.31.23)

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			the Code for the Construction and Equipment of Mobile Offshore Drilling Units, 2009 (2009 MODU Code)
2E	It is recommended that Commandant work with the IMO to amend the MODU Code to require a fire risk analysis to supplement the prescriptive requirements in the MODU Code. The risk analysis should be a performance-based engineering evaluation that utilizes defined heat flux loads to calculate the necessary levels of protection for structures, equipment and vital systems that could be affected by fires on the drill floor, considering the unique design, arrangement, and operation of each MODU.	Concur with the intent of this recommendation	5/2/14 Federal Register / Vol. 79, No. 85 Outer Continental Shelf Units—Fire and Explosion Analyses – Notice of recommended interim voluntary guidelines.
3A	It is recommended that Commandant work with the IMO to amend the IMO MODU Code to establish performance standards concerning the maximum allowable radiant heat exposure for personnel at the muster stations and lifesaving appliance lowering stations, along with guidelines for calculating the expected radiant heat exposure for drill floor fire events for each MODU hull type.	Concur with the intent of this recommendation	6/9/17 IMO Resolution MSC.435(98) Amendments to the Code for the Construction and Equipment of Mobile Offshore Drilling Units, 2009 (2009 MODU Code)
3B	It is recommended that Commandant work with the IMO to harmonize the IMO MODU Code with International Convention for the Safety of Life at Sea (SOLAS) regulation III/16.7 to require adequate emergency lighting of Muster Areas, Lifeboat and Liferaft Lowering Stations and the corresponding waters into which the lifeboats/liferafts will be launched.	Concur with the intent of this recommendation	6/9/17 IMO Resolution MSC.435(98) Amendments to the Code for the Construction and Equipment of Mobile Offshore Drilling Units, 2009 (2009 MODU Code)
3C	It is recommended that Commandant work with the IMO	Concur with the intent of this recommendation	Federal Register / Vol. 77, No. 226 Lifesaving and Fire-Fighting

DEEPWATER HORIZON – VESSEL SAFETY IMPROVEMENTS (last updated 7.31.23)

#	Recommendation	USCG Final Action Memo	Status
	to amend the Lifesaving Appliances (LSA) Code and its testing recommendations to ensure the adequacy of lifesaving appliance standards.		Equipment, Training and Drills Onboard Offshore Facilities and Mobile Offshore Drilling Units (MODUs) Operating on the U.S. Outer Continental Shelf (OCS) – Recommended Interim Voluntary Guidance 6/9/17 IMO Resolution MSC.435(98) Amendments to the Code for the Construction and Equipment of Mobile Offshore Drilling Units, 2009 (2009 MODU Code)
3D	It is recommended that Commandant remove or specifically define the term "when practicable" in Title 46 Code of Federal Regulations (CFR) § 109.213(G)(5). It is further recommended that Commandant work with the IMO to amend the IMO MODU Code, Section 14.11.2.7.	Partially concur with this recommendation	Federal Register / Vol. 77, No. 226 Lifesaving and Fire-Fighting Equipment, Training and Drills Onboard Offshore Facilities and Mobile Offshore Drilling Units (MODUs) Operating on the U.S. Outer Continental Shelf (OCS) – Recommended Interim Voluntary Guidance
3E	It is recommended that Commandant work with the IMO to amend the International Convention on Standards for Training, Certification and Watchkeeping (STCW) to establish MODUs as a "Special Ship" within Chapter V and develop specialized training standards and competencies for masters, officers, particular ratings and special personnel assigned to MODUs to include training for crowd control and crisis management.	Concur with the intent of this recommendation	4/14/14 Training of Personnel and Manning on Mobile Offshore Units and Offshore Supply Vessels Engaged in U.S. Outer Continental Shelf Activities – Advance notice of proposed rulemaking
3F	It is recommended that Commandant work with the IMO to amend the IMO MODU Code to include the type, frequency, extent, randomness and evaluation criteria for all emergency contingency drills.	Do not concur with this recommendation	6/9/17 IMO Resolution MSC.435(98) Amendments to the Code for the Construction and Equipment of Mobile Offshore Drilling Units, 2009 (2009 MODU Code)
3G	It is recommended that Commandant work with the IMO	Do not concur with this recommendation	6/9/17 IMO Resolution MSC.435(98) Amendments to

DEEPWATER HORIZON – VESSEL SAFETY IMPROVEMENTS (last updated 7.31.23)

#	Recommendation	USCG Final Action Memo	Status
	to amend the STCW to develop standards and competencies for the operation of lifesaving appliances that serve liferafts.		the Code for the Construction and Equipment of Mobile Offshore Drilling Units, 2009 (2009 MODU Code) 6/9/17 IMO Resolution MSC.435(98) Amendments to the Code for the Construction and Equipment of Mobile Offshore Drilling Units, 2009 (2009 MODU Code)
3H	It is recommended that Commandant evaluate the adequacy of inflatable liferafts served by a launching appliance installed on MODUs whose hull design is not of a traditional ship's hull and determine if other suitable lifesaving appliances could enhance occupant safety.	Do not concur with this recommendation	NA
3I	It is recommended that Commandant work with the IMO to develop a symbol for "knife" and require the placement of a label to identify its location in all lifesaving appliances requiring the tool.	Concur with the intent of this recommendation	
3J	It is recommended that Commandant work with the IMO to amend the IMO MODU Code to prohibit the dual purpose acceptance of life boats as rescue boats, and adopt the "widely separated location" philosophy applied to the quantity and location of rescue boats on board MODUs.	Concur with the intent of this recommendation	Federal Register / Vol. 77, No. 226 Lifesaving and Fire-Fighting Equipment, Training and Drills Onboard Offshore Facilities and Mobile Offshore Drilling Units (MODUs) Operating on the U.S. Outer Continental Shelf (OCS) – Recommended Interim Voluntary Guidance 6/9/17 IMO Resolution MSC.435(98) Amendments to the Code for the Construction and Equipment of Mobile Offshore Drilling Units, 2009 (2009 MODU Code)
3K	It is recommended that Commandant revise the 33 CFR, Subchapter N regulations, to establish designated standby	Concur with the intent of this recommendation	

DEEPWATER HORIZON – VESSEL SAFETY IMPROVEMENTS (last updated 7.31.23)

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	vessels for MODUs engaging in oil and gas drilling activities on the U.S. Outer Continental Shelf (OCS).		
3L	It is recommended that Commandant work with the IMO to amend the IMO MODU Code to address the need for a fast rescue boat/craft on board MODUs.	Do not concur with this recommendation	NA
3M	It is recommended that Commandant amend 46 CFR § 109.213 and work with the IMO to amend the IMO MODU Code to require the performance of a man overboard drill on at least a quarterly basis.	Concur with the intent of this recommendation	Federal Register / Vol. 77, No. 226 Lifesaving and Fire-Fighting Equipment, Training and Drills Onboard Offshore Facilities and Mobile Offshore Drilling Units (MODUs) Operating on the U.S. Outer Continental Shelf (OCS) – Recommended Interim Voluntary Guidance 6/9/17 IMO Resolution MSC.435(98) Amendments to the Code for the Construction and Equipment of Mobile Offshore Drilling Units, 2009 (2009 MODU Code)
3N	It is recommended that Commandant revise the 33 CFR, Subchapter N regulations, to require the owner/operator of a MODU operating on the U.S. OCS, instead of the leaseholder, to develop and submit an emergency evacuation plan (EEP).	Concur with the intent of this recommendation	
3O	It is recommended that Commandant revise the 33 CFR, Subchapter N regulations, to establish performance and evaluation criteria and require the annual exercise of the EEPs, including all identified emergency resources, equipment and agencies necessary to perform a mass evacuation.	Partially concur with this recommendation	
4A	It is recommended that Commandant revise the current	Concur with the intent of this recommendation	

DEEPWATER HORIZON – VESSEL SAFETY IMPROVEMENTS (last updated 7.31.23)

#	Recommendation	USCG Final Action Memo	Status
	<p>policy with respect to response plan requirements for vessels engaging in oil and gas drilling activities on the U.S. OCS. Operator’s response plans should specifically address responses to vessel fires in addition to well fires.</p>		
4B	<p>It is recommended that Commandant evaluate regulatory requirements for operators of vessels engaging in oil and gas drilling activities on the U.S. OCS to maintain a continuously manned shore-based operations center for monitoring operations and maintaining primary and emergency communications for responding to casualties.</p>	<p>Concur with this recommendation</p>	
4C	<p>It is recommended that Commandant evaluate regulatory requirements for vessels engaging in oil and gas drilling activities on the U.S. OCS to relay daily loading information to a designated person ashore.</p>	<p>Do not concur with this recommendation</p>	<p>NA</p>
4D	<p>It is recommended that Commandant require that MODUs and floating production, storage and offloading vessels engaging in oil and gas drilling activities on the U.S. OCS be subject to the salvage and marine firefighting requirements of 33 CFR § 155, Subpart I.</p>	<p>Concur with the intent of this recommendation</p>	
4E	<p>It is recommended that area committees evaluate the adequacy of their area contingency plans for responding to incidents involving vessels engaging in oil and gas drilling activities on the U.S. OCS.</p>	<p>Concur with this recommendation</p>	
4F	<p>It is recommended that Commandant evaluate the current policy regarding the implementation of an incident commander to perform both the search and rescue mission</p>	<p>Concur with this recommendation</p>	<p>Internal Coast Guard Process Improvement</p>

DEEPWATER HORIZON – VESSEL SAFETY IMPROVEMENTS (last updated 7.31.23)

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	coordinator and federal on scene coordinator duties during an event consisting of a mass rescue operation and a major marine casualty.		
4G	It is recommended that Commandant review all organization policy on marine firefighting to ensure consistency.	Concur with this recommendation	Internal Coast Guard Process Improvement
4H	It is recommended that Commandant update the regulations to include the requirement to conduct a deadweight survey every five years for all (U.S. and foreign flagged) column stabilized MODUs to be consistent with the current IMO MODU Code.	Concur with the intent of this recommendation	
5A	It is recommended that Commandant develop a risk-based Port State Control targeting program to provide additional oversight for foreign-flagged MODUs working on the OCS based on predetermined evaluation criteria, including the identity of the flag state.	Concur with this recommendation	6/8/11 Coast Guard CG-543 Policy Letter 11-06 Risk-Based Targeting of Foreign Flagged Mobile Offshore Units (MODUs)
5B	It is recommended that Commandant develop more comprehensive inspection standards for foreign-flagged MODUs operating on the OCS.	Concur with this recommendation	
5C	It is recommended that Commandant work with the IMO to develop a code of conduct for Recognized Organizations to ensure that verification of all flag state requirements is being conducted properly.	Concur with the intent of this recommendation	5/17/13 Resolution MEPC.237(65) Code for Recognized Organizations (RO Code)
5D	It is recommended that Commandant further develop the Operational Risk Assessment model (Appendix M) for use by MODU personnel and government inspectors.	Do not concur with this recommendation	NA

DEEPWATER HORIZON – VESSEL SAFETY IMPROVEMENTS (last updated 7.31.23)

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5E	It is recommended that Commandant work with International Association of Classification Societies to improve implementation of its Procedural Requirement 17.	Concur with the intent of this recommendation	
5F	It is recommended that Commandant revise the current marine casualty reporting requirements and drug testing requirements for foreign-flagged MODUs operating on the OCS and make them consistent with the requirements for U.S.-flagged MODUs.	Partially concur with this recommendation	6/14/23 Federal Register / Vol. 88, No. 114 Marine Casualty Reporting on the Outer Continental Shelf – Supplemental Notice of Proposed Rulemaking.
5G	It is recommended that Commandant evaluate the benefit of combining current OCS inspection responsibilities assigned to multiple OCMI zones into one inspection office responsible for covering all OCS inspection activities.	Concur with this recommendation	4/15/15 Federal Register /Vol. 80, No. 72 Consolidation of Officer in Charge, Marine Inspection for Outer Continental Shelf Activities – Final Rule
5H	It is recommended that Commandant determine how to continue to maintain a properly trained and educated Coast Guard work force for MODU and OCS inspections.	Concur with this recommendation	Internal Coast Guard Process Improvement
5I	It is recommended that Commandant investigate the role of Safety Management System failures in recent marine casualties and based upon those investigation findings, determine if a change in the current inspection and enforcement methods is required to increase compliance with the International Safety Management (ISM) Code. The investigation should include a request to the National Research Council, Commission on Engineering and Technical Systems, Marine Board to perform a comprehensive investigatory assessment of the	Concur with the intent of this recommendation	9/10/13 Federal Register Vol. 78, No. 175 Safety and Environmental Management System Requirements for Vessels on the U.S. Outer Continental Shelf

DEEPWATER HORIZON – VESSEL SAFETY IMPROVEMENTS (last updated 7.31.23)

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	effectiveness of the ISM Code as used in the marine environment.		
5J	It is recommended that Commandant work with BOEMRE to evaluate the benefits of shifting to a "Safety Case" approach similar to that used in the North Sea, a method in which there is a more holistic approach to safety.	Partially concur with this recommendation	
5K	It is recommended that Commandant require, and coordinate expanded International Safety Management (ISM) Code examinations of all Transocean vessels that are subject to the ISM Code and engaging in oil and gas drilling activities on the U.S. OCS.	Concur with the intent of this recommendation	
5L	It is recommended that Commandant work with the Republic of the Marshall Islands to require an immediate annual verification of the safety management system of Transocean offices (Main and North America). Because this investigation has questioned DNV's performance as the recognized organization for the RMI, another approved recognized organization should perform the verification.	Concur with the intent of this recommendation	