



INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS

MEMORANDUM

TO: Distribution

FROM: Alan Spackman, Vice President, Offshore Technical and Regulatory Affairs

SUBJECT: Report on the 54th Session of the IMO's Sub-Committee on Fire Protection

DATE: 15 July 2010

The 54th session of IMO's Sub-Committee on Fire Protection (FP 54) was held from 12 to 16 April 2010 under the chairmanship of Mr. J.C. Cubisino (Argentina). Representatives attended the session from 55 IMO member nations, 2 Associate Members of IMO, 2 intergovernmental and 16 non governmental organizations IADC was not represented at this session.

The following is a summary of issues addressed by the Sub-Committee that may affect those engaged in offshore oil and gas activities:

Fire Safety Systems and SOLAS

The following were referred to the Maritime Safety Committee's 88th session (MSC 88) in November-December 2010 for the action indicated:

- Fixed gas and water-spraying fire-extinguishing systems for vehicle, ro-ro, container and general cargo spaces, the Sub-Committee agreed to the draft amendments to chapters 5 and 7 of the FSS Code, and the draft amendments to SOLAS regulation II-2/20, for approval and subsequent adoption;
- Draft amendments to chapter 6 of the FSS Code and the draft Guidelines for testing and approval of fixed high-expansion foam systems together with an associated draft MSC circular for approval, and subsequent adoption as appropriate;
- Draft Scientific methods on scaling of test volume for fire test on water-mist fire-extinguishing systems, together with an associated draft MSC circular for approval;
- Draft amendments to the Revised Guidelines for the approval of equivalent water-based fire-extinguishing systems for machinery spaces and cargo pump-rooms (MSC/Circ.1165), concerning redundant means of pumping and ceiling and bilge nozzles (paragraph 17 of, and paragraph 1.3 of appendix B to, the annex to the Revised Guidelines) and an associated draft MSC circular approval;
- Draft amendments to chapter 8 of the FSS Code, concerning alternative extinguishing systems for control stations for approval and subsequent adoption; and
- Draft Revised Guidelines for the approval of fixed water-based local application fire-fighting systems for use in category A machinery spaces (MSC/Circ.913) and the associated draft MSC circular for submission to MSC 88 for approval. The Sub-Committee also agreed to the related draft amendments to SOLAS regulation II-2/10.5.6.3.1 for approval and subsequent adoption.

The Sub-Committee agreed to re-establish a Correspondence Group, under the coordination of the United States¹, to continue work on:

- Further consider the draft Guidelines for approval of helicopter facility fire-fighting appliances;
- Revisions to resolution A.123(V) on fire extinguishing arrangements in control stations, accommodation and service spaces; and
- Fixed deck foam fire-extinguishing systems;
- Fixed deck foam fire-extinguishing systems for cargoes introducing additional fire hazards (alcohol foam);
- Fire hoses and nozzles;

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- Fire-fighter's outfits;
- Zoned method of fire test protocol of water mist fire-extinguishing systems for larger machinery spaces;
- Consideration of updates to the Unified interpretations of SOLAS Chapter II-2, the FSS Code, the FTP Code and related fire test procedures, MSC/Circ.1120; and
- Revision of the Guidelines on maintenance and inspection of fire protection systems and appliances, MSC/Circ.850.

Amendment of the Fire Test Procedures (FTP) Code

Having completed a comprehensive review of the FTP Code, the Sub-Committee agreed to the draft 2010 FTP Code and the associated draft MSC resolution for submission to for adoption at MSC 88.

Amendments to the Guidelines for the application of plastic pipes on ships (resolution A.753(18))

The Sub-Committee agreed to draft amendments to paragraph 1.2.3 of the Guidelines for the application of plastic pipes on ships (resolution A.753(18)) and an associated draft MSC resolution for submission to MSC 88 for adoption.

Harmonization of ventilation system requirements

It was agreed to establish a Correspondence Group, under the coordination of the United States², to:

- Incorporate outstanding IMO unified interpretations related to the draft amendments to SOLAS regulation II-2/9.7 with a view towards harmonization;
- Validate the need and proposed size cut-offs for automatic fire dampers to be installed for ducts passing through "A" class boundary penetrations;
- Further consider the provisions for "B" class penetrations, closing appliances and galley ventilation ducts; and
- Clarify the draft provisions related to smoke control/management systems.

Inert gas systems on small tankers

The Sub-Committee decided to further debate the lower limit for fitting IGS on new tankers at the next session, carrying forward the two potential limits of 5,000 and 8,000 tonnes deadweight. Draft amendments to SOLAS regulation II-2/4.5.5 were prepared and will also be considered.

Clarifications of SOLAS chapter II-2 requirements regarding interrelation between central control stations and safety centres

The Sub-Committee agreed to the draft Interim Clarifications of SOLAS chapter II-2 requirements regarding interrelation between the central control station, navigation bridge and safety centre and an associated draft MSC circular for submission to MSC 87 (May 2010) for approval.

Suction for emergency fire pumps in cargo ships

The Sub-Committee considered the revised IACS UI SC 178 and agreed that the combination of heave and pitch, as well as heave and roll, contained in the unified interpretation were acceptable. The Sub-Committee agreed to a draft Unified interpretation of chapter 12 of the FSS Code and the associated draft MSC circular, for submission to MSC 88 for approval.

Fixed hydrocarbon gas detection systems on double-hull oil tankers

The Sub-Committee agreed to the draft Guidelines for the design, construction and testing of fixed hydrocarbon gas detection systems and an associated draft MSC circular for submission to MSC 87 for approval.

Air inlets and openings in the superstructures of tankers

The Sub-Committee considered two options for harmonizing the requirements that exist in various IMO instruments and other international standards with regard to ignition of flammable gases or vapors that can enter through separate openings to a ship's working or accommodation spaces:

2 Mr. Laurence E. Fisher (Laurence.e.fisher@uscg.mil)

- .1 To refine the current prescriptive approach by producing a comparative table of all requirements in various IMO instruments before proceeding to harmonize all of them in comparison with other international standards; or
- .2 To amend the FSS Code by introducing a new chapter containing the harmonized requirements with subsequent amendments to the IBC and IGC Codes and the SOLAS Convention to refer to the new chapter of the FSS Code.

France opined that the application of the provisions of standard IEC 60092-502 to avoid the ignition of gases coming from the cargo area in tankers would mean a reduction of the current IMO safety level.

The United States noted that IEC 60092-502 is focused on electrical sources of ignition, which is only one element of the hazard. They informed the Sub-Committee that the ISGOTT safety guide discusses many other sources of ignition, such as open flames, sparks, heated surfaces and static discharge that need to be considered. It was also pointed out that the toxicity of petroleum and chemical vapors should be taken into account when considering the location of entrances and air inlets to the accommodations.

The issue will be further considered, with a view to its being finalized, at the next session.

Means of escape from enclosed working spaces in machinery spaces

The Sub-Committee considered proposed amendments to SOLAS regulations II-2/13.4.1 and II-2/13.4.2 on means of escape from machinery control rooms and other enclosed spaces within machinery spaces that would be applied to new ships.

Recognizing the need to clarify terms, including "such ladders", "enclosed spaces" and "continuous fire shelter", the Sub-Committee invited the submission of comments and proposals to the next session.

Revision of the Recommendations for entering enclosed spaces aboard ships

The Sub-Committee considered the work undertaken by other Sub-Committees on this issue, as well as documents submitted to this session. Due to the need for additional consideration, it was agreed that the MSC should be asked to extend the target completion date to 2011.

Means for recharging air bottles for air breathing apparatuses

The MSC 86, the Committee agreed to include, a high-priority item on "Means for recharging air bottles for air breathing apparatuses" in the agenda for this session, with a target completion date of 2011; however, no documents were submitted. Submissions were invited for the next session.

Test laboratories recognized by the Administrations

The latest annual FP circular on Test laboratories recognized by the Administrations has been issued as FP.1/Circ.39.

Halon banking and reception facilities

The latest annual FP circular on Halon banking and reception facilities has been issued as FP.1/Circ.40.

Elections. The Sub-Committee unanimously re-elected Mr. J.C. Cubisino (Argentina) as Chairman and Mr. C. Abbate (Italy) as Vice-Chairman, for 2011.

Next Session. The 55th session is tentatively scheduled from 21 to 25 February 2011, with working or drafting groups on the following subjects:

- Performance testing and approval standards for fire safety systems; and
- Measures to prevent explosions on oil and chemical tankers transporting low-flashpoint cargoes.

The IMO-prepared report of the deliberations of the Sub-Committee, including annexes to the report, is posted on the IADC's website at: <http://iadc.org/committees/offshore/IMO.html>. These documents are password protected. IADC members should contact me to obtain the password.

Please feel free to contact me by phone (1 / 713 292 1964) or e-mail (alan.spackman@iadc.org) with any questions you may have regarding this report.