

NATIONAL OFFSHORE SAFETY ADVISORY COMMITTEE (NOSAC)

TASK STATEMENT

TOWAGE OF MOBILE OFFSHORE DRILLING UNITS, MOBILE OFFSHORE UNITS AND FLOATING OFFSHORE INSTALLATIONS ON THE U.S. OUTER CONTINENTAL SHELF

TASK:

Establish a Subcommittee to provide recommendations for the towage of Mobile Offshore Drilling Units (MODUs), Mobile Offshore Units (MOUs) and Floating Offshore Installations (FOIs) on the U.S. Outer Continental Shelf (OCS).

BACKGROUND:

The Coast Guard issued Navigation and Vessel Inspection Circular No. 11-91 (NVIC 11-91) in early 1991, some 24 years ago, in response to losses of a number of jack-up MODUs while under tow. In NVIC 11-91, the Coast Guard endorsed the International Association of Drilling Contractors (IADC) "General Ocean Tow Recommendations for Jackup Drilling Units dated February 13, 1991 which was a result of a NOSAC approved recommendation made on February 21, 1991.

In the interim years, a number of guidelines and recommendations related to ocean towage have been developed by the offshore industry, among them by owners of MODUs and MOUs, by marine insurance underwriter warranty surveyors, by classification societies and internationally recognized maritime organizations. Safety Management Systems (SMS) have also developed in the interim 20+ years and address various modes of operations for MODUs, MOUs, ocean going tugs and anchor handling towing supply vessels (AHTS).

The offshore mineral and oil industry on the U.S. Outer Continental Shelf (OCS) has also expanded significantly in the last 2 decades and the towage of various units has increased while the types of towing vessels has changed from ocean going tugs to combination type of units, namely AHTS and the introduction and use of heavy lift dry transport vessels to move MODUs, MOUs and FOIs.

Recent incidents, the December 2011 total loss of the MODU KOLSKAYA (with loss of life) and the December 2012 grounding of the MODU KULLUK, both while under tow during severe weather conditions highlight the need for better understanding of decision-making authority, pre-planning of ocean towage and proper response actions in emergency situations, particularly involving severe and harsh environments, such as seasonally occur in both the Alaskan (and Gulf of Mexico) OCS. The KULLUK Report of Investigation (ROI) calls out for additional focus for operating in arctic marine environments. This incident also brought many other issues, besides the technical requirements and capabilities of the towing vessel, that need to be incorporated into towage plans: into SMS and bridging documents between the towing vessel and unit being towed – roles and responsibilities of the crews onboard each vessel or unit; handling of emergency situations and communications to/from shore based principals.

PROBLEM:

The Coast Guard's Navigation and Vessel Inspection Circular (NVIC) No. 11-91 and IADC's "General Ocean Tow Recommendations for Jackup Drilling Units" were last updated in 1991.

Other organizations have developed guidelines for the ocean towage of MODUs and MOUs. These guidelines do not specifically deal with the ocean tow of all types of MODUs and MOUs on the U.S. OCS and in harsh environments. In addition, guidance is needed to clarify the roles that different principals (such as the towing vessel Master, the OIM/ Master of the unit being towed, the warranty surveyor, etc.) have in the ocean towage of these different types of units.

DELIVERABLES:

1. Provide recommendations to the Coast Guard for towage of all types of MODUs, MOUs and FOIs operating or being moved or relocated on the OCS, including guidance for emergency towage of those types of units that have lost means of either towage or propulsion.
2. Incorporate in recommendations the unique requirements and needs to address during towage in harsh environments such as the arctic, winter storm and/or hurricane prone areas of the OCS.
3. Provide explanations and/ or reasoning for the guidance or recommendations.
4. Provide recommendations on any other towage issues on the OCS.

TIMING AND SUBCOMMITTEE MEMBERSHIP:

1. The subcommittee will endeavor to prepare and submit a final report to provide guidance, comments and recommendations to the Coast Guard by the November 2015 NOSAC meeting alternately an Interim Report with recommendations by the November 2015 NOSAC meeting with a Final Report on or before the Spring 2016 NOSAC meeting.
2. The subcommittee should consist of owners, operators and Masters of MODUs, MOUs, Towing Vessels, Marine Warranty surveyors experienced in the towage of these units on the US OCS - Pacific, Atlantic, Arctic and Gulf of Mexico.

COAST GUARD REPRESENTATIVES:

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