



Willemstad, 15 May 2018

## Notice to Shipping 06

### ALTERNATIVE DOCUMENTATION OF MODU CODE BOTTOM SURVEY

**To** : Ship owners, Ship's operators and managers, Masters, RO's  
**Applicable to** : MODU Code  
**Effective as from** : 01 June 2018

#### 01 Background

The IMO MODU CODE 1989/1999/2009 require two dry dock surveys to be carried out in any five (5) year period where the maximum interval between any two such surveys should not exceed 36 months. With consent from flag Administration, the bottom surveys of mobile offshore units are normally carried out as in-water surveys with the purpose to confirm by visual inspection (ROV or diver) that the submerged part of the hull and items surveyed at the same time (sea chests, valves, thrusters, piping, anodes etc.) remains satisfactory for the service for which the unit is intended.

Changes in class systematics driven by new technologies and more involvement by owner may also be utilized when documenting integrity and water tightness of the hull as required by IACS UR Z15, 4.1.1 and IMO MODU Code 1989, 1999 and 2009. The RO's are therefore looking at alternative ways of accepting documentation of the integrity and water tightness of the hull.

#### 02 General

The overall risk evaluation for alternative ways of accepting documentation of the integrity is considered according to the following:

##### **A. Exposure to hull damage:**

Offshore units are significantly less exposed to bottom damages than regularly trading ships because of:

- no risk of grounding when operating in deeper waters
- low probability of contact with other floating objects
- low risk profile related to other damages to the hull (ship collision, dropped objects etc.), and such events are inevitable to detect
- units prepared for continuous operation are expected to have sufficient corrosion protection by anodes and/or impressed current system designed for enhanced operation window



## B. Units prepared for continuous operation

Units intended for continuous operation are expected to:

1. be prepared for inspection, testing and maintenance of sea chests and sea valves from inside of hull
2. leak detection systems installed for continuous monitoring of structural water tightness
3. have continuous condition monitoring of thrusters if operating on dynamic positioning
4. have possible access to submerged part of hull from the inside of tanks and compartments
5. have improved corrosion control by cathodic protection and/or impressed current

Based on the premise of the above, the integrity of the underwater hull is considered sufficiently documented with basis in alternative information used in the evaluation such as:

- a. tracking of traffic around the units to assure no damage due to contact with other vessels
- b. tracking of all lifting activities onboard to assure no damages due to lifting/dropped objects
- c. inspection of sea chests by borescope from the inside of the hull
- d. blinding off and testing of sea valves from the inside
- e. risk based approach for inspection of corrosion protection system, inspection scope to be defined by class and agreed to and followed by owner
- f. inside inspections of hull bottom from holds and tanks
- g. alternative measurement of bottom plating thickness from inside of double bottom/tanks if considered necessary
- h. thruster performance covered by thruster CBM arrangement, i.e. not considered part of bottom survey scope

### **03 Statement**

- Taking in account that by utilizing available survey arrangements and methodologies as an alternative to the traditional bottom survey by ROV or diver, significant cost reductions can be obtained by owners while the control of the structural integrity and floatability of the unit is still maintained;
- That the owner needs to apply and qualify for the new bottom survey arrangement;
- Regarding the proposed alternative documentation of MODU CODE Bottom Survey;





The Curacao Flag Administration declares that we have no objection against the above presented and could accept the bottom survey to be credited by alternative documentation as specified in this NTS 06-2018 and not only based on traditional survey by ROVs or divers, subject to the development of a detailed procedure for the alternative documentation of MODU CODE bottom survey which will be discussed with Flag Administration before taken into use.

The Head of the Shipping Inspectorate in Curacao  
On his behalf

  
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