MINUTES OF THE
NATIONAL OFFSHORE SAFETY ADVISORY COMMITTEE
MEETING HELD APRIL 25, 2002

A meeting of the National Offshore Safety Advisory Committee (NOSAC) was held on April 25, 2002 in Room 4816, of the Coast Headquarters Bldg., 2100 Second Street, SW, Washington, DC. The meeting began at 9:30 a.m. and ended at approximately 3:15 p.m. The meeting was videotaped for the permanent record, and was announced in the Federal Register on Wednesday, March 13, 2002 (FR Volume 67, Number 49, Pg. 11367).

Representing the Coast Guard (USCG) were RADM Paul Pluta, CAPT Michael Brown, Executive Director of NOSAC, and Mr. James Magill, Assistant to the Executive Director.

The following Committee members were present:

Mr. Robert Alario
Mr. Philip Nuss
Ms. Nicki Candies
Mr. André Galerne
Mr. Chuck Bedell
Mr. Roland Rodney

Mrs. Wanda Parker
Mr. John Ryan, III
Mr. Mark Witten
Mr. Kenneth Dawson
Mr. Don Ray

The following Committee members were absent:

Mr. Bernie Stewart
Dr. Ross Saxon

Mr. Paul Liberato
Mr. Ned Stevenson

OPENING REMARKS

CAPT Brown opened the meeting by welcoming everyone and thanking all for attending. After some administrative announcements, CAPT Brown turned the moderating of the meeting over to Chairman John Ryan.

Chairman Ryan began his opening remarks by welcoming everyone and having the Committee and audience introduce themselves. He especially welcomed RADM Pluta, CAPT Brown, Jim Magill, MMS representatives, past NOSAC members, other governmental agencies and associations who were present. Chairman Ryan then began his remarks by comparing the difference a year makes and how the happenings of the terrorist attacks of September 11 changed many things. Examples of these changes: the Gulf of Mexico rigs working was 60.5% in March of this year compared to 88.1% a year ago; a number of mergers and acquisitions occurred and one company filed for Chapter 11 bankruptcy with re-organization plan yet to come; natural gas prices had changed from $ 5.84 per thousand cubic feet of gas a year ago to $ 3.283 per thousand cubic feet today; crude oil prices had been volatile but had just recently regained their level of a
year ago at $26.31 per barrel. Mr. Ryan concluded by saying that these were only a few of the noteworthy items which had happened over this past year and we can only sit back and await the ever changing face of the oil and gas industry.

RADM Pluta then swore in new members Mr. Roland Rodney and Mr. André Galerne, and swore in Mr. John Ryan who is a reappointed member. He then presented Coast Guard public service awards to outgoing members Ms. Nicki Candies and Dr. Ross Saxon. CAPT Brown read the citations accompanying the awards. Dr. Saxon was not able to attend the meeting, so Chairman Ryan will present him with the award later in Houston.

RADM Pluta thanked everyone for attending and thanked the committee for participating in the workings of NOSAC. RADM Pluta’s opened his remarks by saying that the terrorist attacks of 11th September had changed the focus of the Coast Guard. He explained that since September 11th, the Coast Guard focus has been distracted from the work of marine safety to devote much more to maritime security. He explained that before September 11th, only about 1% of the Coast Guard’s operating budget was spent on maritime security, as compared to 58% after September 11th. RADM Pluta then gave a short report on the Coast Guard’s work on maritime security since September 11th. He said that the Coast Guard was involved in maritime security internationally at IMO as well as domestically.

CAPT Brown gave a status report on the approval of the NOSAC slates. He said that the January 2001 slate had been approved, and the new members sworn in today. He said that a good pool of candidates had been received for the January 2002 slate. From this pool the 2002 slate has been prepared and sent to DOT with our recommendations. DOT will make their final decisions and hopefully they will do so in time to send out the appointment letters before the next NOSAC meeting in November 2002. He thanked those Committee members whose terms had expired, for continuing to serve on the committee until a new slate is approved.

SUBCOMMITTEE REPORTS

IMO/ISO Issues Subcommittee: Mr. Spackman gave a very informative report on the matters discussed at various IMO Committee and Subcommittee meetings that had taken place recently. He prepared a comprehensive handout that he had sent to the Committee by e-mail and made available to the public as handouts at the meeting. Mr. Spackman explained briefly all the IMO items in his report. He said that there had been a number of IMO Assembly Resolutions issued last fall, and that these were documented in the report. He offered to supply any of these by e-mail to anyone who wanted them. He said that IADC had been working with the Coast Guard on the IMO maritime security position papers. Mr. Spackman concluded by briefly commenting on the activities of the International Organization for Standardization (ISO). He pointed that the Natural Gas Industries Committee (TC67) has continued its pace in producing new oil and gas standards, but that this pace should slow down soon.

Prevention Through People (PTP) Subcommittee on “Crew Alertness in the Offshore Industry”: Mr. Don Ray, PTP Subcommittee chairman reported on the Subcommittee meeting held the previous day. He reported that the meeting was well attended, with 5 Subcommittee
members and about 25 members of the public in attendance. The business of the Subcommittee was to review and approve the draft report prepared and sent to the Subcommittee before the meeting, and to amend the report as required during the meeting. Mr. Ray said that there was considerable discussion on the draft report during the meeting and the Subcommittee agreed to modify the report to reflect some of the concerns expressed during the meeting. The draft report was modified to include these concerns and the final report provided as a handout for NOSAC and the public. Mr. Ray went on to review the final report, outlining the work done by the Subcommittee. He read the findings of the final report. He said, in closing, that the PTP Subcommittee of NOSAC hereby submit this report in response to the issues raised in the Task Statement on “Crew Alertness in the Offshore Industry”. This report constitutes completion of the assignment given to it by NOSAC and adequately addresses the issues raised in the Task Statement.

Mr. Richard Block reported on how the Gulf Coast Mariners Association (GCMA) had prepared a yellow book containing letters from mariners describing violations of the 12-hr rule. The yellow book had been sent to various persons in the Coast Guard including RADM Pluta and nothing had been done about it.

In response RADM Pluta said that he would discuss with his staff and take this for action. He assured Mr. Block that he and the Coast Guard were very concerned about the welfare of the mariners and would work together to address any violation of the Coast Guard rules.

**Deepwater Activities Subcommittee**: Subcommittee chairman Mr. Chuck Bedell apologized to the Committee for not being able to attend the last meeting to give the Subcommittee report. He thanked Mr. Magill for giving a short summary on his behalf at the last meeting and for suggesting that he give some concluding remarks on the final report at this meeting. Mr. Bedell then went over the work of the Subcommittee and explained the concluding recommendations. He explained that the report did not address the risk due to terrorist acts as this was not in the Task Statement, but this could be addressed if thought necessary. Mr. Bedell thanked the members of the Subcommittee for the work they had performed and also thanked the various Coast Guard personnel from Headquarters to 8th District and MMS who had helped in answering questions and providing help to the Subcommittee.

Chairman Ryan congratulated Mr. Bedell and his Subcommittee for producing such a great report.

**USCG/OMSA Task Force on Development and Implementation of STCW Convention for OSVs**: Mr. Robert Alario reported on the current status of the work of the task force on the application of STCW criteria to offshore supply vessels (OSVs) and related vessels in the offshore industry. He reported that the preamble to his report is that STCW continues to prove to be a very difficult transition from the old system of qualifying mariners to the new convention regulated system. Because of the difficulty of implementing STCW and meeting the STCW dates, IMO and many countries have deferred some requirements of STCW to later dates.
Pipeline-free Anchorages Subcommittee: Chairman John Ryan gave this report. He commented on a newspaper article concerning a pipeline that had been laid on top of a 200 year old shipwreck.

MMS represented by Mr. Bud Danenburger, commented on the newspaper article explained that the operator had done everything correctly according to the rules. He explained that a lot of underwater art effects had been discovered and knowledge gained because of the oil and gas industry program.

OTHER BUSINESS

Subchapter N Status Report: Mr. James Magill, Project Manager for this rulemaking gave this report. He explained that due to a new directive given by the Coast Guard Chief of the Office of Regulations and Administrative law, Coast Guard personnel involved in rulemakings should not provide information to the public regarding pending rulemakings prior to their final publication. Our standard response on the status of any of our regulatory projects should be; that the rulemaking is under “internal review and development”. The reasoning is that giving detailed status reports just precipitates unwarranted inquiries that does not speed up the review process and could result in additional scrutiny because of public inquiry. The bottom line is that we should not say where a rulemaking is in the review process. However, Mr. Magill said that he could give some information without violating these instructions. He reported that he was about 50% through the review of the 113 comment letters to the NPRM but, most recently had had to concentrate on the MMS/USCG Final Rule and workshop associated with the fixed platform inspection rulemaking. Mr. Magill also explained that, for the next 6 months, rulemaking project teams and project lawyers would be working primarily on standards development relating to port and maritime security including offshore facilities. Mr. Magill reported that on the subject of how to address Part 144 – Floating Production Facilities, to include gaps in FPSO standards, the Coast Guard had decided to proceed with the FR of subchapter N, and concurrently to proceed with a Supplementary Notice of Proposed Rulemaking (SNPRM). This SNPRM would revise Part 144 to include the additional FPSO standards needed to cover the gaps in the present NPRM.

Update on USCG Initiatives on Crew Fatigue: LT Scott Calhoun of the Coast Guard Office of Design and Engineering Standards, Human Element and Ship Design Division (G-MSE-1), had given a presentation to NOSAC at the April, 2001 meeting on the work being done by the Coast Guard G-MSE-1 office, and the Coast Guard’s Research and Development Center on the Crew Endurance Management Program, and the Crew Alertness Campaign (CAC). At this meeting he gave an update on this program. LT Calhoun explained that the CAC was the process being used under the program to reduce the incidents of crew fatigue and increase mariner alertness. He shared with the committee some of the successes of the three towing vessel companies participating in the program. These successes showed documented reduction in “call-in-sickness”, reduction in accidents and injuries, and lower turnover rate of crews. He discussed some of the actual changes that were done on the vessels that was part of the CAC. The Coast Guard has a guide available that can be used to “train the trainer”. In conclusion Lt Calhoun expressed the Coast Guard’s desire to partner and work with companies from the
offshore industry. He said that a start had been accomplished in this endeavor whereby the Coast Guard was working with the Offshore Marine Service Association (OMSA) and Mr. Alario.

Mr. Bob Alario commended LT Calhoun and the Coast Guard for the good work they had performed in promoting this program.

**USCG/MMS Rulemaking on Inspection of Fixed Facilities:**
Mr. Magill reported for the Coast Guard and Mr. David Moore for MMS on the new rulemaking project designating MMS as the agency to perform inspections and enforcement of fixed OCS facilities on behalf of the Coast Guard.

Mr. Magill said that he would like to acknowledge that this project had been a combined effort of MMS and the Coast Guard. He said that while the Coast Guard may have written the regulations, there had been much review and input from his MMS colleagues; from Greg Gould, Bud Dannenburger, Dick Giangerelli, David Moore and especially Stacie Atkins for arranging and organizing the workshop. Mr. Magill said that since the last NOSAC meeting he was pleased to report that the Final Rule was published on February 7, 2002, about 9 months after the NPRM was published. A significant accomplishment for a rulemaking going through two agencies. The Final Rule could be viewed and printed from the internet, using the Coast Guard Docket Management System. The web site address is: [http://dms.dot.gov](http://dms.dot.gov) using docket number 9045.

Mr. Magill recalled that in the preamble to the final rule a promise was given to hold a workshop to alleviate industry concerns regarding how this agreement between the Coast Guard and MMS would be implemented. A Fed Register notice announcing the workshop was published on March 21, 2002, and the workshop was held on the morning of April 12, 2002 in the Sheraton North Houston hotel. Mr. Magill said that by his estimates, about 200 persons attend the workshop. To begin the workshop the Coast Guard and MMS gave presentations on the history of the rulemaking and how the implementation process would work. A question and answer session then took place with a panel of MMS and Coast Guard personnel answering questions from the audience.

Mr. Magill then handed over to Mr. David Moore of MMS to report on the implementation process.

Mr. Moore introduced himself and proceeded to explain the MMS implementation and inspection process. He described how he was working with LCDR Walters of Coast Guard HQTRS to organize and run the process of having Coast Guard inspectors train the MMS inspectors in Coast Guard regulated items. He said that there would be four locations in the Gulf of Mexico and the Pacific Coast for classroom training, and this would be followed by field training. MMS hoped to have a guidance document available in a few weeks that would cover detailed items of the process. Mr. Moore said that MMS planned on inspecting at least 10% of the fixed facilities annually, which would be augmented by some MMS and Coast Guard spot inspections. The database associated with this inspection process would be managed by MMS with review by the Coast Guard.

**Maritime and Offshore Industry Security Issues:** CDR Englebert introduced herself and gave a presentation on the security work in which the Coast Guard was involved as a result of the
September 11\textsuperscript{th} terrorist incidents. On the domestic front, CDR Englebert described the seven initiatives the Coast Guard had put into effect since September 11\textsuperscript{th}. CDR Englebert said that the Coast Guard had proposed three levels of security even though Governor Ridge’s Homeland security department had suggested a five level system. The maritime community thought that a three level system was more appropriate for that industry; blue, green and yellow would be combined as the first level of security, with orange and red being the second and third level.

Mr. Danenburger commented on the Coast Guard’s three level security system. He said that the MMS were using the five level system but that they should probably go to the three level, same as the Coast Guard, for consistency.

On the international front, CDR Englebert detailed the work the Coast Guard was involved with at the International Maritime Organization (IMO) in developing a security Protocol/Code and preparing position papers. CDR Englebert described the work done and achievements obtained by Coast Guard personnel at the IMO meetings in London since the September 11\textsuperscript{th}. The U.S. was successful in having the IMO agree to producing an International Security Code. Now the work was to produce this Code, with all the necessary development and review of position papers. CDR Englebert said there were nine U.S. position papers which she would make available on the internet. CDR Englebert described the U.S. position paper on Port Facilities which includes offshore facilities and MODUs.

Mr. Tim Sampson of the American Petroleum Institute (API) said that he did not like the U.S. position paper as it related to offshore fixed and floating facilities.

Committee member Mark Witten expressed his displeasure that the Coast Guard had not given the NOSAC or the offshore industry the opportunity to review/comment on the paper.

Mr. Magill explained that there was not sufficient time to have a public meeting.

Mr. Alario concurred and identified a similar situation in the past involving tonnage issues where the OSV industry was not given the opportunity to comment on IMO position papers.

CAPT Brown pointed out that there was a public meeting scheduled for the May 3\textsuperscript{rd}, 2002 to discuss the U.S. position at IMO, and he encouraged everyone to attend.

Mr. André Galerne pointed out that the protection of pipelines from attack by submarines did not seem to be included and should be considered.

CAPT Brown, in reply to Mr. Galerne’s query, explained that this type of hostile act would be the responsibility of the U.S. armed forces such as the Navy and would not be in the purview of the Coast Guard.

Mr. Mark Witten moved that a NOSAC Subcommittee be formed on Offshore Security. The motion was seconded by Ms. Wanda June Parker. The committee unanimously voted to form a Offshore Security Subcommittee. Mr. Mark Witten volunteered to be chairman of this subcommittee.
**Liftboat Issues and Task Statement for possible Subcommittee:** Mr. Paul Cojeen, Chief of the Naval Architecture Division of the Office of Design and Engineering Standards gave a short presentation on the Coast Guard’s concerns relating to recent casualties involving large liftboats. He presented a draft Task Statement and requested that a Subcommittee be formed to provide information and recommendations to the Coast Guard. Mr. Cojeen, displaying a picture of a recently built liftboat, pointed out that the newly designed liftboats had gotten much larger than that of a few years ago.

Mr. Alario stated that he had forwarded the Task Statement questions to the OMSA liftboat committee. The OMSA liftboat committee will work with the NOSAC Subcommittee to provide information and help in any other way needed.

Chairman Ryan asked for a motion to form a Liftboat Subcommittee. Mr. Witten made such a motion and it was seconded by Mr. Alario. The committee unanimously voted to form a Liftboat Subcommittee. Chairman Ryan said that Mr. Paul Liberato, who could not be present at the meeting, had volunteered to be chairman of this subcommittee.

Mr. Bud Danenburger of MMS said that they would volunteer an MMS representative to serve on the subcommittee.

**PUBLIC COMMENT**

**Mr. Tim Ryburn Jr.:** Mr. Reyburn gave a very touching description of the conditions and details surrounding how his brother Greg was lost in the sinking of the OSV “Botruc 26”. He expressed some doubt concerning the effectiveness of the Coast Guard’s Streamlined Inspection Program. Mr. Reyburn urged everyone to read the Coast Guard accident report when it become available.

**Mr. Richard Block:** Mr. Block commented on the proposed tonnage regulations that Mr. Alario had mentioned earlier. He said that tonnage is extremely important because every mariner’s license is tied to the tonnage of the vessel on which he serves. He requested that the method by which the national tonnage is converted to the international tonnage be standardized so as to be less confusing to the mariner. He asked that CAPT Brown keep everyone informed on the tonnage issue. Mr. Block asked that the Coast guard provide a “whistle blower protection” for mariners reporting violations of the 12-hour rule.

**Michael Cheramie:** CAPT Cheramie addressed the committee on the subject of hours worked and fatigue on OSVs and recounted some of his experiences during his 20 year career to demonstrate that there were problems with mariners exceeding allowable hours.

**Mr. Joe Deakin of Australia:** Mr. Deakin of Australia commented on the slow progress by the United States on the implementation of STCW. He felt that the U.S. was not moving forward in a timely manner on this issue of great importance to the plight of mariners.
Mr. Alario replied to Mr. Deakin’s comments. He pointed out that 140 countries had asked for deferment at IMO as they acknowledged the difficult transition from the old system of qualifying mariners to the new convention regulated system.

**LETTER FOR THE RECORD**
Chairman Ryan stated that he had been given a letter from Seabulk Offshore, Ltd. with the request that it be included in the record of these minutes. The letter is included as Enclosure 4.

**NEXT MEETING/ADMINISTRATIVE ITEMS**

**Date/Location for Next Meeting:** The next NOSAC meeting is scheduled for November 7, 2002, in Houston, Texas, and if subcommittee meetings are needed, they will be held on November 6, 2002 at the same location.
**Summary of Action Items:**

<table>
<thead>
<tr>
<th>ITEM</th>
<th>BY</th>
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<tbody>
<tr>
<td>1. Accept Task Statement and establish Subcommittee on liftboat</td>
<td>NOSAC</td>
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<td>issues (done).</td>
<td></td>
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<tr>
<td>2. E-mail IMO security papers to committee.</td>
<td>J. Magill &amp; CDR</td>
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<tr>
<td></td>
<td>Englebert</td>
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<tr>
<td>3. Establish Offshore Security Subcommittee (done) and draft Task</td>
<td>M. Witten &amp; J.</td>
</tr>
<tr>
<td>Statement</td>
<td>Magill</td>
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<td>4. Address issue of providing better mariner confidentiality when</td>
<td>USCG</td>
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<tr>
<td>Coast Guard violations are reported.</td>
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<tr>
<td>5. Review Coast Guard response to “Yellow Book” Letters.</td>
<td>USCG</td>
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Michael W. Brown, CAPT, USCG  
Executive Director

Mr. John Ryan, III  
Chairman
Crew Alertness in the Offshore Industry

A Report from the

Prevention Through People Sub-committee

to

The National Offshore Safety Advisory Committee of the United States Coast Guard

April 25, 2002
Washington, D.C.
1.0 BACKGROUND

This report is prepared in response to the Task Statement, “Adequacy of the 12-hour Rule”, given to the Prevention Through People (PTP) sub-committee during the November 2, 2000, meeting of the National Offshore Safety Advisory Committee (NOSAC). The title of the Task Statement was later changed to “Crew Alertness in the Offshore Industry” at the April 19, 2001, meeting of NOSAC.

The Task Statement (Appendix A) was created in response to allegations first raised by members of the public at the December 9, 1999, meeting of NOSAC and, again, more fully at the April 20, 2000, meeting. Assertions were made that Federal Law and associated regulations (46 USC 8104) were being routinely violated by operators of offshore service vessels (OSVs) and towing vessels. In particular, it was alleged that because of more modern equipment and changes in the nature of the voyages of these vessels, crewmembers were not receiving adequate training and rest, creating the potential for fatigue and raising concerns for safety.

2.0 TASK STATEMENT DELIVERABLES

The Task Statement requires the sub-committee to prepare two reports:

(1) Findings concerning the following issues:
   a. Changes in the level of risk to offshore safety as a result of longer voyages to deepwater operations.
   b. Changes in the level of risk to offshore safety that may result from inadequate training where more modern and complex equipment is used.
   c. Potential risk to offshore safety that may result from difficulty in implementation of the so-called “12-hour rule” on OSVs and towing vessels.

(2) Review existing studies from the Coast Guard and IMO on crew alertness with particular attention to the effects of implementation of the so-called “12-hour rule”.

The sub-committee delivered their report on item (2) at the November 8, 2001, meeting of NOSAC. The present report covers item (1).
3.0 RESEARCH BY THE SUB-COMMITTEE

The PTP sub-committee has reviewed numerous references in an effort to determine if a clear basis exists for the allegations that led to the creation of the Task Statement.

These references include published reports and studies made by numerous persons and organizations relating to factors that affect crew alertness. A bibliography of such references appears in Appendix B to this report.

In addition, the sub-committee reviewed documents provided by the U. S. Coast Guard pertaining to reports of violations of the body of law and regulations commonly referred to as the “12-hour rule”.

The sub-committee received input from the Offshore Marine Service Association (OMSA), representing owners and operators of OSVs and towing vessels.

The sub-committee also received input from the Gulf Coast Mariners Association (GCMA) regarding alleged violations of the “12-hour rule”.

The above efforts constitute the extent of the sub-committee’s research work.

4.0 FINDINGS OF THE SUB-COMMITTEE

With respect to the specific requirements of the Task Statement the sub-committee finds the following:

(1) Changes in the level of risk to offshore safety as a result of longer voyages to deepwater operations.

The sub-committee could not determine that this is a significant risk to offshore safety. Safety statistics of Total Recordable Incident Rate, kept by OMSA, exhibit a downward trend that has reduced, by a factor of three, the incident rate during the period of 1992-2000 (Appendix C). Recordable incidents comprise of
medical treatment cases and lost time injury cases. A similar trend is found for Lost Time Incident Rate. It is also instructive to note that the incident rates reported for OSVs and towing vessels are significantly below the incident rates of general industry and for transportation workers in general.

These facts indicate that safety is improving on these vessels, rather than getting worse, regardless of the lengths of voyages.

(2) Changes in the level of risk to offshore safety that may result from inadequate training where more modern and complex equipment is used.

The sub-committee found that recent requirements of the International Maritime Organization (IMO) pertaining to Standards of Training, Certification, and Watchkeeping for Seafarers (STCW), which are now coming into effect, address worker training and worker fatigue. The STCW requires levels of training appropriate to the equipment onboard and also requires a demonstration of competency by any operator of the equipment. It is believed that the STCW requirements will have a positive affect on safety onboard OSVs and towing vessels.

Many companies that own and operate OSVs and towing vessels have already taken steps to provide similar levels of training to their employees prior to the IMO requirements coming into force.

Furthermore, many of the larger vessels, which tend to be more modern and technically complex, are required to comply with the International Safety Management (ISM) Code, which will become effective during 2002. The ISM Code requires that adequate management systems be in place on the vessel and in the shore based offices to address issues of safety during operation. Annual audits of these systems are required. Such requirements should further enhance safety in the offshore workplace.
(3) Potential risk to offshore safety that may result from difficulty in implementation of the so-called “12-hour rule” on OSVs and towing vessels.

The PTP sub-committee was unable to determine from records furnished by the U. S. Coast Guard that violations of the “12-hour rule” routinely occur.

Mariners have a duty under current law to report such violations and are encouraged by the Coast Guard to do so. It was not evident from the Coast Guard records if this routinely occurs.

The information furnished to the sub-committee by the Coast Guard for the calendar years 1992 through 2000 shows only 8 manning level violations on OSVs have been reported. Such a low number of violations does not support the allegation that violations of the “12-hour rule” are widespread.

The GCMA has submitted a compilation of anonymous complaints to the Coast Guard and maintain that there was no discernable action taken on any of the complaints. The Coast Guard has responded that the individuals making such claims should contact the Coast Guard directly. The GCMA members present at the meeting said they do not trust the Coast Guard to protect their confidence or to act upon their reports.

The sub-committee recommends to NOSAC that the Coast Guard note and vigorously investigate the mariner’s stated concerns regarding confidentiality of reports of violations and the mariner’s belief that reports are not followed up by the Coast Guard and take action as the Coast Guard deems appropriate.

5.0 CLOSURE

The Prevention Through People sub-committee of the National Offshore Safety Advisory Committee hereby submit this report in
response to issues raised in the Task Statement, “Crew Alertness in the Offshore Industry”.

The sub-committee is of the opinion that this report, together with the one delivered at the last meeting of NOSAC, constitute completion of the assignment given to it by NOSAC and adequately addresses the issues raised in the Task Statement.
Appendix A

NATIONAL OFFSHORE SAFETY ADVISORY COMMITTEE (NOSAC)

TASK STATEMENT
to the
SUBCOMMITTEE ON PREVENTION THROUGH PEOPLE
ON
CREW ALERTNESS IN THE OFFSHORE INDUSTRY

I. TASK TITLE:
Crew alertness in the offshore industry.

II. Purpose:
To identify any substantive impact on safety within the offshore energy industry resulting from the implementation, or lack thereof, of the so-called “12-hour rule” on offshore supply and towing vessels engaged in Outer Continental Shelf Activities.

III. BACKGROUND
During a recent meeting of NOSAC, some mariners asserted that the provisions of 46 U.S.C. 8104 were being violated and alleged this to be, in part, the result of changes in the nature of the operations being carried out by offshore supply vessels (OSVs) and towing vessels that are engaged in Outer Continental Shelf activities. It was claimed that longer voyages in the Gulf of Mexico and increasingly more modern and complex vessels require crews to be more alert than in the past. Concern was expressed that crew fatigue may be a factor affecting the safety of offshore operations involving OSVs and towing vessels operating on the Outer Continental Shelf.

The Coast Guard is aware of the issue of crew fatigue and alertness and is itself conducting research into fatigue because it has been identified as a concern across all modes of transportation. The Coast Guard’s R&D Center is conducting three studies of crew alertness. In the Fall 2000, they expect to complete a guide on improving crew alertness on deep draft vessels. Also, a handbook on watchstanding alertness on towing vessels is expected by the fall of 2000. Further development of a Crew Endurance Management System is planned for completion in the fall of 2004. In addition, the IMO has put together a Fatigue Correspondence Group and Coast Guard Headquarters, through its Human Element and Ship Design Division, is undertaking the development of a crew alertness campaign.
IV. PROBLEM:

While there is no specific evidence from casualty analysis or near-miss-reports that fatigue is a special problem in the OSV and towing vessel industry, the consequences of having fatigued crews on OSVs and towing vessels could be very serious. Therefore, assessing the risk of fatigue, and identifying steps which could reduce such risk are in the interest of companies who operate OSVs and towing vessels and the mariners who serve on board them. The issues of particular concern that should be addressed by the PTP Subcommittee include:

- Changes in the level of risk to offshore safety as a result of longer voyages to deepwater operations;
- Changes in the level of risk to offshore safety that may result from inadequate training where more modern and complex equipment is used;
- Potential risk to offshore safety that may result from difficulty in implementation of the so-called “12-hour rule” on OSVs and towing vessels.

V. TASK:

A. Description:

1. The PTP Subcommittee is to prepare and submit to NOSAC a report of their findings concerning the issues bulleted in IV, above.
2. Review existing studies from the Coast Guard and IMO on crew alertness, with particular attention to the implementation of the so-called “12-hour rule”.

B. Estimated time to complete this task is up to two years.

C. Recommended professional qualifications: Chairman and Members of the PTP Subcommittee and other interested persons, including representatives of the mariner community.

D. Coast Guard Technical Representative:

   Mr. James M. Magill
   Phone: (202) 267-1082
   Mailing address; Commandant (G-MOS-2)
   United States Coast Guard
   2100 Second Street, SW
   Washington, D.C. 20593-0001
Appendix B

Bibliography of Documents
Reviewed by the PTP Sub-Committee

1. PTP Task Statement.


3. Association of Diving Contractor’s International, Inc. memo regarding rest periods.


6. U. S. Coast Guard Policy on Watchkeeping and Work-Hour Limitations.

7. U. S. Coast Guard memo regarding Crew Endurance Management program.

8. “Crew Alertness Campaign” brochure and flyer.

9. NOSAC memo of February 6, 2001 with Minutes from November 2, 2000 meeting and sign-in sheets.

10. Gulf Coast Mariners Association memo regarding Engineroom Manning on Offshore Supply Vessels.

11. Coast Guard memo and enclosures from GCMA re: “Study of Louisiana Mariners, Violation of the 12-Hour Work Day” and Inspection Certificates.


16. Gulf Coast Mariners Association paper “Fatigue and Human Error in the Marine Industry”.

Appendix C


Provided by Offshore Marine Services Association

TRIR 1992-2000

<table>
<thead>
<tr>
<th>Year</th>
<th>All Workers TRIR Rate</th>
<th>Transportation TRIR Rate</th>
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