



Marine Safety Center Technical Note

Date: 15 March 1995

SSIC: 16703/ 46 CFR 170.255

MTN: 01-95

Subj: PERMISSIBLE LOCATIONS OF CLASS I WATERTIGHT DOORS

Ref: (a) Title 46 CFR Part 170.255
(b) Commandant (G-MVI) Policy letter 9160/2 No. 22-89
dtd 31 Jan 90

1. **PURPOSE:** This memorandum consolidates and clarifies regulation and policy governing the placement of Class 1 watertight doors on all vessels subject to 46 CFR 170.255.

2. **DISCUSSION:** 46 CFR 170.255 governs the placement of Class I watertight doors (WTD) in bulkheads that have been made watertight to comply with the flooding or damage stability regulations on all vessels except MODUs and self-propelled hopper dredges with a working freeboard. Reference (b) further restricts the use of Class I WTDs on Subchapter T vessels. This memorandum provides working definitions for some of the terms used in references (a) and (b), and promulgates MSC policy for the consistent application of these regulations.

3. **ACTION:**

a. Enclosure (1) is a flow chart to be used when reviewing the location of Class I WTDs on all vessels except Subchapter T vessels. Where the flow chart indicates that a Class I WTD is permissible with the OCMI's approval, 46 CFR 170.255(b)(1) applies. The door must be located where it will be kept closed at all times except when actually in use. In practice, the initial determination of whether the door will normally be left closed is made by the reviewing officer. In those cases where the MSC determines that the door will not be kept closed due to the nature of the spaces served, the use of a Class I WTD will be disallowed at the plan review stage. In all other cases the plan can be approved, but the approval letter will state that final determination as to whether the door will normally be left closed, and therefore the permissibility of a Class I WTD, is left to the OCMI.

b. Enclosure (2) is a flow chart to be used when evaluating watertight door locations for Subchapter T vessels, which incorporates the guidance in reference (b). Typically, if enclosure (2) indicates that a Class I WTD is permissible, the door is considered to be located where it will normally be left closed, and no additional evaluation is required at the plan review stage. However, the OCMI may disallow the use of a Class I WTD, in accordance with 46 CFR 170.255(b)(1), even if all of the conditions of enclosure (2) are satisfied, in those cases where it is determined that due to the service of the vessel or the specific nature of the spaces involved the door might not be kept closed.

c. Definitions for use when applying enclosures (1) and (2) are provided in enclosure (3).

d. Nothing in this memorandum addresses or effects the requirements of 46 CFR 170.255 (c) - (e).

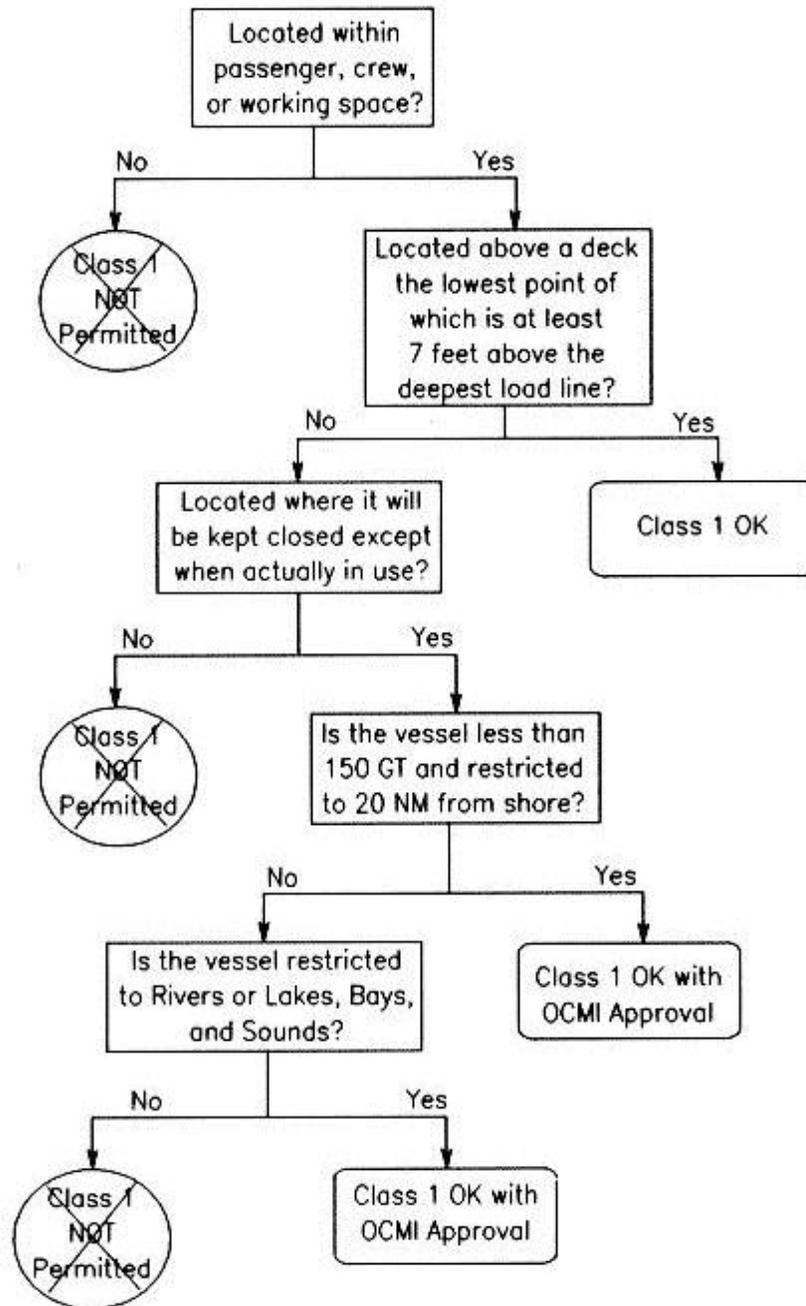


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Encls: (1) Flowchart for Vessels Other than Subchapter T Vessels
(2) Flowchart for Subchapter T Vessels
(3) Definitions for Use When Applying This Technical Note

Class 1 Watertight Door Permissible Location Flow Chart (All vessels except Subchapter T vessels)

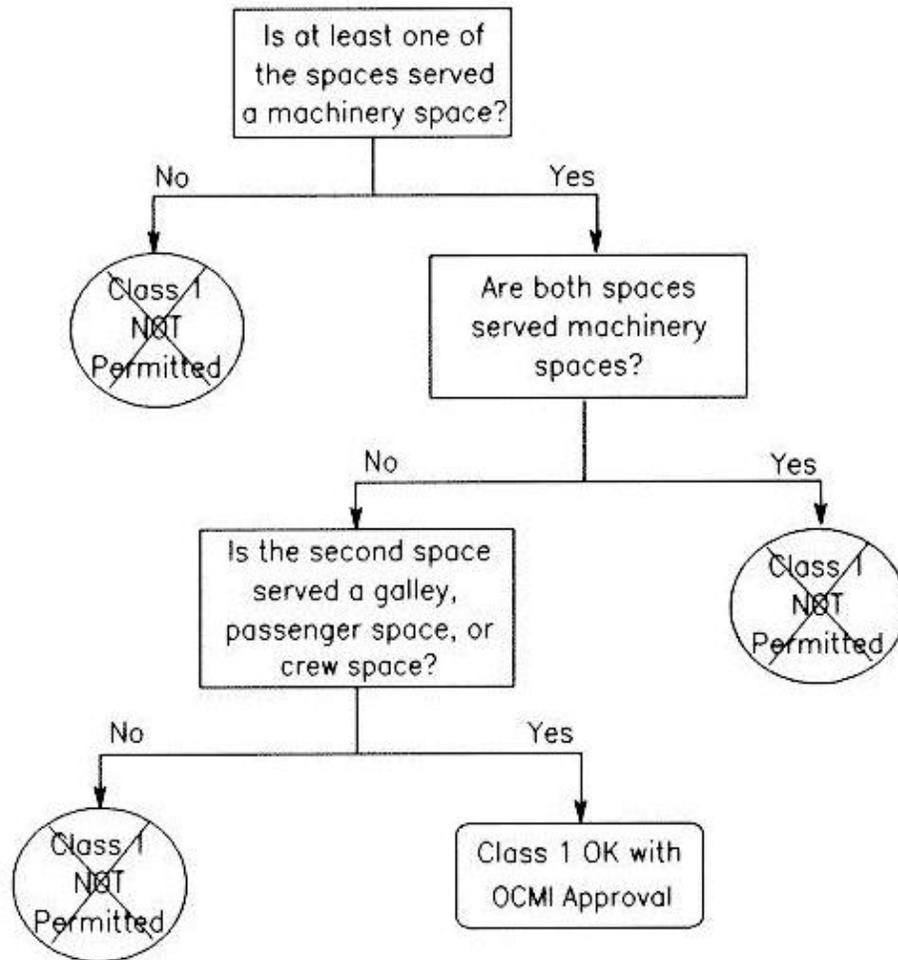


Note: 46 CFR 170.255(d) allows Quick Acting Class 1 Watertight Doors in any location on a vessel which operates on the Great Lakes and is required to meet the damage stability standards of 46 CFR 172, Subpart H (Special Rules for Great Lakes Dry Cargo Vessels).

Enclosure (1)

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Class 1 Watertight Door Permissible Location Flow Chart (Subchapter T vessels)



Note: 46 CFR 170.255(d) allows Class 1 Watertight Doors in any location on vessels which are less than 100 GT and which operate only in the offshore oil industry trade.

Enclosure (2)

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Definitions For Use When Applying This Technical Note

1. **Within** - At least one of the spaces served is a passenger, crew, or working space.
2. **Passenger Space** - (46 CFR 171.010(j)) - Spaces which are provided for the accommodation and use of passengers, other than baggage, store, provision, or mail rooms.
3. **Crew Space** - (46 CFR 72.50-5(c)) - Sleeping rooms, messrooms, recreational rooms, toilet and shower spaces, etc., which are intended for the exclusive use of the crew.
4. **Machinery Space** - (46 CFR 171.010(h)) - Spaces containing main and auxiliary propelling machinery, propulsion boilers, or permanent coal bunkers. Auxiliary spaces containing only HVAC equipment, compressors, water heaters, refrigeration units, thrusters, and other auxiliary machinery are not considered machinery spaces.
5. **Working Space** - (46 CFR 72.05-5(j)) - Only those service and machinery spaces where personnel are normally employed. Does not include those spaces where personnel may occasionally visit or be employed for short periods of times.

Enclosure (3)

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