



SUB-COMMITTEE ON FIRE PROTECTION
53rd session
Agenda item 12

FP 53/12/3
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CONSIDERATION OF IACS UNIFIED INTERPRETATIONS

Unified interpretation to the International Code for Fire Safety Systems (FSS Code), chapter 12, paragraph 2.2.1.3

Submitted by the International Association of Classification Societies (IACS)

SUMMARY

<i>Executive summary:</i>	This document contains proposed modification to IACS UI SC 178 (originally provided at annex to document FP 51/9/9), which takes into account the comments raised during FP 52
<i>Strategic direction:</i>	1.1
<i>High-level action:</i>	1.1.2
<i>Planned output:</i>	1.1.2.1
<i>Action to be taken:</i>	Paragraph 8
<i>Related documents:</i>	FP 51/9/9 and FP 52/21, paragraph 12.6

Background

1 In document FP 51/9/9, IACS explained the rationale used in the development of IACS UI SC 178, which is set out in the annex to that document.

2 The Sub-Committee, at its fifty-second session, was informed of the SLF Sub-Committee's agreement that the combination of heave and pitch, as well as heave and roll, contained in the revised IACS UI SC 178 were acceptable. However, acceptance of SC 178 was held in abeyance taking into account comments made by several delegations relating to construction issues that needed to be resolved.

Discussion

3 It is the understanding of IACS that the discussion at FP 52 focussed on two areas of the Unified interpretation which impact on construction issues:

- .1 in paragraph 1.2 of UI SC 178, replacing the words "sheltered waters" by the words "the lightest condition specified in the stability manual to be taken into account"; and
- .2 in paragraph 2 of UI SC 178, the exclusion of the words "ballast water exchange" and "berthing condition".

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4 With respect to the conditions where the roll, pitch and heave estimations do not need to be applied, IACS considers it prudent to provide a transparent condition which can be uniformly applied so as to ensure that the emergency fire pump remains operable during sheltered water conditions, which may be lighter than what may be included in the approved stability booklet. Accordingly, the emergency fire pump suction is to remain submerged at an assumed static waterline drawn through the level of 2/3 immersion of the propeller at even keel in which case roll, pitch and heave need not be applied.

5 IACS reconsidered the exclusions and concluded that a complete waiver from the requirements for the total suction head during ballast water exchange (BWE) is not prudent. However, recognizing that a BWE process can require in excess of 36 hours to complete and that not all steps of this process will be out of compliance with the requirements for total suction head, IACS concluded that it seemed reasonable to accept transitory deviations during ballast water exchange, which may occur during specific steps of the BWE sequence, provided the transitory deviation is limited in duration (not more than 2 hours).

6 With respect to the “*berthing condition (during cargo handling at berth)*” exemption, IACS still considers that berthing conditions should be exempted as this condition will be covered by the condition described in paragraph 4 above.

Proposed modification

7 Based on the above, the following revisions (additions/deletions) to UI SC 178, as provided at annex to document FP 51/9/9, are proposed for consideration:

.1 paragraph 1.2:

~~“Sheltered water condition for which roll, pitch and heave are not to be taken into account: The emergency fire pump suction is to remain submerged at Aassumed static waterline drawn through the level of 2/3 immersion of the propeller at even keel (for pod or thruster driven ship, special consideration is to be given) is to be considered: in which case roll, pitch and heave need not be applied.”; and~~

.2 paragraph 2:

“The following conditions need not be considered:

- transitory deviations during ballast water exchange condition provided the transitory deviation is limited in duration (not more than 2 hours) (assuming that appropriate precaution is taken with respect to fire safety); and
- berthing condition (during cargo handling at berth).”

Action requested of the Sub-Committee

8 The Sub-Committee is invited to consider the above, in particular the proposed revisions provided in paragraph 7 above, to IACS UI SC 178 (originally provided at annex to document FP 51/9/9), and take action as appropriate.