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SUB-COMMITTEE ON STABILITY AND
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GUIDANCE ON THE IMPACT OF OPEN WATERTIGHT DOORS ON EXISTING AND NEW SHIP SURVIVABILITY

Report of the SDS Correspondence Group

Submitted by Sweden and the United Kingdom

SUMMARY

<i>Executive summary:</i>	This document provides the SDS Correspondence Group's report on the guidance on the impact of open watertight doors on existing and new ship survivability
<i>Strategic direction:</i>	2
<i>High-level action:</i>	2.1.1
<i>Planned output:</i>	2.1.1.2
<i>Action to be taken:</i>	Paragraph 12
<i>Related documents:</i>	SLF 51/10, SLF 51/10/1, SLF 51/10/3 and SLF 51/17

Introduction

1 The Sub-Committee, during its fifty-first session, re-established the SDS (Subdivision and Damage Stability) Correspondence Group to, *inter alia*, prepare a draft Guidance on the impact of open watertight doors on existing and new ship survivability under the joint coordination of Sweden and the United Kingdom (document SLF 51/17, paragraph 10.6).

2 Sweden and the United Kingdom would like to thank the following Member States for their participation in the correspondence group: the Bahamas, Finland and the United States.

3 The terms of reference (TOR) for the correspondence group were established as follows:

.1 To prepare a draft Guidance on the impact of open watertight doors on existing and new ship survivability, and to submit a report to SLF 52. In doing so the following should be taken into account:

1.1 the draft text contained in document SLF 51/10/1 together with comments and proposals submitted in documents SLF 51/10 and SLF 51/10/3;

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- 1.2 IACS UI SC 156 dated June 2006 (2002);
- 1.3 applicability of any formulae; and
- 1.4 the need to differentiate between new and existing ships for applicability of the guidance.

4 All background material was made available for review at the following web address:

<http://www.mcga.gov.uk/c4mca/imosdscg.htm>

Approach taken to address the terms of reference

5 For round 1, a discussion document was prepared asking members to provide information on their present procedures when assessing questions concerning the possibility of keeping watertight doors open when at sea. Members were further asked to provide comments on the necessity to differentiate between new and existing ships, as well as on the proposed standard in document SLF 51/10/1.

Outcome

6 As the comments on the questions were received, it was clear that all members who responded already had various procedures in place for allowing watertight doors to remain open during navigation. The procedures range from strictly operational (using a categorization of doors where the position and sensitivity of the door is taken into account in order to determine the necessity to carry out stability calculations) to a strict requirement for stability checks with the doors open regardless of position.

7 Some members pointed out that at the design stage not enough attention is paid to the need for access to certain areas by the crew. Doors seem to be placed almost as an afterthought which places a heavy obligation on owners and flag States to arrive at a practicable solution following some kind of risk assessment.

8 Whilst none of the members providing comments were opposed to the use of the standard in document SLF 51/10/1 for new ships, at least to identify those doors that cannot be allowed to remain open during navigation, there are some who foresee major problems in having the standard made retroactively applicable to existing ships. Reasons mentioned for this were, amongst others, availability of hull data for calculation and/or the necessity for safety reasons/accessibility to keep some doors open. It was pointed out that the only options for these vessels are operational considerations. On the other hand there are members who have stated very clearly that there are no technical reasons for differentiating between new and existing ships and that the standard in document SLF 51/10/1 should apply to all ships.

9 In document SLF 51/10 it is proposed that account should only be taken for a limited time of progressive flooding through open doors and in document SLF 51/10/3 it is proposed that the work of the DE Sub-Committee should be concluded before any consideration can be given to survivability or floatability requirements.

10 Based on paragraphs 8 and 9, what is believed to be a sound, compromise proposal has been formulated where a new paragraph 3.2 is added to the standard in document SLF 51/10/1, as follows:

“For existing ships the administration may consider an allowance in the criteria stated above in connection with increased operational measures providing an equivalent level of safety”.

11 Although the only member commenting found the proposal acceptable the authors cannot consider this to be the general opinion of the correspondence group.

Action requested of the Sub-Committee

12 The Sub-Committee is invited to consider the information provided and take action as appropriate.
