



USCG Office of Commercial Vessel Compliance (CG-CVC)
Mission Management System (MMS) Work Instruction (WI)



Category	Inspected Vessel Program				
Title	Drydock Examination (DD) and Drydock Extension (DDX) Policy Clarifications				
Serial	CVC-WI-029(3)	Orig. Date	8Jan21	Rev. Date	14Jul23
Disclaimer:	This guidance is not a substitute for applicable legal requirements, nor is it itself a rule. It is not intended to nor does it impose legally-binding requirements on any part. It represents the Coast Guard’s current thinking on this topic and may assist industry, mariners, and the Coast Guard, as well as other federal and state regulators, in applying statutory and regulatory requirements. You can use an alternative approach for complying with these requirements if the approach satisfies the requirements of the applicable statutes and regulations. If you want to discuss an alternative approach (you are not required to do so), you may contact the Coast Guard Office of Commercial Vessel Compliance (CG-CVC) at CG-CVC@uscg.mil which is responsible for implementing this guidance.				
References:	(a) Marine Safety: Marine Inspection Administration, COMDTINST 16000.70 (b) Marine Safety: Domestic Inspection Programs, COMDTINST 16000.71 (c) Survey Guidelines under the Harmonized System of Survey and Certification, IMO Resolution A.1156(32) (d) Navigation and Vessel Inspection Circular 02-95, Change 3 (e) Navigation and Vessel Inspection Circular 01-13, Change 1				
Change Summary:	<ul style="list-style-type: none"> • Added subparagraph D.2.c; revises process for determining <i>Next Exam</i> for vessels subject to drydock exams under an international convention or by an Authorized Classification Society. • Removed all subchapter M phase-in and UWILD information. • Added more specific detail related to certain Alternate Inspection Programs, including paragraph F. • Other editorial revisions for clarity. 				

A. Purpose. This work instruction provides guidance to District Prevention Staffs (dp), Officers in Charge, Marine Inspection (OCMIs), and the Towing Vessel National Center of Expertise (NCOE) relating to administration of drydock exams (DDs) and drydock extensions (DDXs) for inspected vessels.

B. Background.

1. CG-CVC, Districts, and OCMIs each have a role in the administration of drydocking requirements. The assignment of *Last Exam* and *Next Exam* for drydocking often forms the basis for a vessel owner or operator to schedule drydock availability and plan for a pause in vessel operations. As such, consistency in administering DD intervals is important for compliance with the regulatory scheme and to minimize impacts to commercial business.
2. Minimum DD intervals are found in each inspection subchapter within 46 CFR and can be divided generally into two types: “once every X” and “twice-in-five.” Vessels subject to a “once every X” interval include all small passenger vessels and most vessels operating on freshwater routes that must have an exam once every 1, 2, 5, 10, or 15 years, as applicable. Vessels subject to a “twice-in-five” interval include most tank, passenger, cargo, and towing vessels operating in salt water and all offshore supply vessels that must conduct two exams within any five-year period with no more than three years between any two exams.

C. Action. All units should apply this guidance when administering DDs and DDXs for inspected vessels.

D. Guidance for all inspected vessels.

1. **Last Exam date**. Upon completion of an exam, Marine Information for Safety and Law Enforcement (MISLE) should be updated so that the *Last Exam* is the date on which all requirements of the exam are met and not the date on which the exam began (i.e., credit).
2. **Next Exam date**. Upon completion of an exam, follow the steps in a., b., or c. below, as applicable, to determine the *Next Exam* date.
 - a. Vessels subject to a “twice-in-five” DD interval: Follow the process in enclosure (1). Examples are provided in enclosure (2). Enter the *Next Exam* into MISLE and generate a COI amendment.
 - b. Vessels subject to a “once every X” DD interval: Find the *Next Exam* date by adding the interval as specified in the applicable inspection subchapter to the *Last Exam* date. Then, if an extension was approved, deduct the number of months of extension used (i.e., time between the original due date and the exam start date, rounded to the nearest month). Finally, set the *Next Exam* as the last day of the month. Examples are provided in enclosure (2). Enter the *Next Exam* into MISLE and generate a COI amendment.
 - c. Vessels subject to DD under an international convention or a class certificate from an Authorized Classification Society (ACS): The *Next Exam* should align with the DD due date assigned by the organization that issued the certificate. This paragraph does not change any regulation or policy regarding who must conduct the DD, only that the timing of the exam should align with the class-assigned dates.

Examples:

- For a vessel in the Alternate Compliance Program (ACP), Maritime Security Program (MSP), or MSP-Select (MSP-S), the *Next Exam* date should align with the corresponding ACS survey date, in accordance with reference (c).
- For a vessel that holds an International Load Line Certificate or that is classed by an ACS, the *Next Exam* should align with the corresponding ACS survey date.
- For a towing vessel under the Towing Safety Management System (TSMS) option or a vessel enrolled in the Streamlined Inspection Program (SIP), the *Next Exam* date is determined using the appropriate process in subparagraph a. or b. above, unless it holds an international or class certificate that requires DD.

3. **Change from saltwater interval to freshwater interval**.

- a. A DD date should not be extended when the vessel moves from a saltwater interval to a freshwater interval until the vessel completes the current saltwater DD cycle and the OCMI expects the vessel to remain in freshwater service for at least a five-year period.
- b. Where the vessel cannot meet the five-year freshwater interval requirement, the exam interval should remain as a saltwater interval.

4. Approval of DDX.

- a. Enclosure (3) provides the level within the Coast Guard organization that can approve a DDX under each inspection subchapter.
 - b. Districts should not further delegate DDX approval authority to OCMI's. If questions arise regarding delegation of DDX approval authority, CG-CVC should be consulted.
 - c. If the DDX approval authority is the OCMI, prior to approving a DDX, the OCMI should ensure a Marine Inspector attends the vessel to examine the vessel and conduct an internal structural examination to the extent necessary to validate that the condition of the vessel is, in their opinion, satisfactory for the extension requested. The attendance should include an interview of the vessel's master and/or chief engineer to obtain their opinion on the vessel's hull, shafting, propellers, steering gear and associated machinery. A written attestation from the master and/or chief engineer may be required as a condition of DDX approval.
 - d. If the DDX approval authority is District or COMDT, the OCMI should attend the vessel as described in subparagraph c. above and provide a recommendation via memo to the approval authority.
 - e. Except as described in paragraph F. of this work instruction, for vessels subject to DD under an international convention or a class certificate from an ACS, a DDX must be approved by the authority noted in enclosure (3), as it would otherwise. Following completion of the extended DD, the *Next Exam* should align with the due date assigned by the organization that issued the international or class certificate.
 - f. The COI should not be amended following approval of a DDX. The approval letter should be entered into the documents for the corresponding MISLE activity and a special note added indicating the new date for the granted extension.
 - g. OCMI's should remind applicants subject to the procedures in subparagraphs D.2.a and D.2.b of this work instruction that the duration of DDX used will be deducted when assigning the *Next Exam* date.
5. **Multi-service vessels.** Each vessel certificated under multiple subchapters is subject to the more frequent exam interval. The extension approval authority is the highest organizational level for the given extension duration for the applicable subchapters. For example, a vessel operating in saltwater certificated under both subchapters "L" and "T" must undergo a DDX every two years (the "T" requirement), since that is more stringent than "twice in five" (the "L" requirement). If, for example, that same vessel requested a DDX of two months, the approval authority would be the District.
6. **Drydocking in excess of requirements.** The OCMI should be notified and informed of the circumstances warranting the drydocking in excess of regulatory requirements¹. Even if the drydocking is not requested for credit, a MI may attend to examine the underwater hull structure and fittings. Such an attendance should not unduly impede the vessel's schedule unless there are indications of damage or unauthorized repairs.

¹ Subchapters D, H, I, L, R, and U *require* that the owner, operator, etc. notify the OCMI.

D. Additional guidance for subchapter M.

1. For the purposes of drydock and internal structural exam surveys, the phrase “prior to commencing activities” (as used in 46 CFR § 137.315) means 30 days prior to commencing actual work conducting a drydock exam or internal structural exam. Where a 30-day notice is not possible, it means as soon as practicable.
2. For the purposes of drydock and internal structural exam surveys, the term “unsafe condition” includes a condition or threat to a vessel’s safety, or fitness for service or route, that requires immediate corrective action. For example, vessel damage that was not previously detected, but is evident when the vessel has been removed from the water, requires notification to the cognizant OCMI pursuant to 46 CFR § 137.325.
3. Vessels inspected under the TSMS option:
 - a. Third Party Organizations (TPOs) do not have the authority to approve DDXs. A TPO’s input will be considered when the OCMI evaluates the extension request.²
 - b. In lieu of an interview, the master and/or chief engineer and their TPO may provide a written statement attesting that the vessel is in suitable condition for operation during the period of the requested extension. The TPO should then visit the vessel and conduct an internal structural exam to ensure the vessel’s condition agrees with written statements provided.
 - c. Drydocking in excess of requirements. The TPO should be notified so that a TPO surveyor may examine the underwater hull structure and fittings to the extent practicable.

E. DDX for vessels enrolled in certain alternate inspection programs. Vessels enrolled in the following alternate inspection programs should adhere to DDX guidance in the relevant NVIC, as summarized here:

1. Alternate Compliance Program (ACP) DDX (see reference (d)).
 - a. The owner/operator of a vessel enrolled in the ACP may request that the ACS extend required statutory surveys for a period of up to 90 days in accordance with the ACS’s rules, respective agreement with the Coast Guard, and the provisions of SOLAS I/14.
 - b. The ACS and vessel owner/operator should notify the cognizant OCMI whenever drydocking, or internal structural examination surveys are scheduled.
 - c. The ACS must submit requests for drydock extensions beyond 90 days to CG-CVC-4 for approval at FlagStateControl@uscg.mil.
2. Maritime Security Program (MSP) DDX (see reference (e)).
 - a. MSP vessels follow the guidance as outlined in Part D. of this work instruction and Enclosure 3, Drydock Extension (DDX) Approval Authority Table.
3. Maritime Security Program (MSP) Select DDX (see reference (e)).
 - a. Drydock (DD), Internal Structural (ISE), and Cargo Tank Internals (CTIE) examinations are to be conducted in accordance with ACS procedures, at the intervals for hull surveys prescribed by the ACS’s rules.

² The OCMI may consider input from the vessel’s TPO in lieu of MI attendance when determining whether to extend the vessel’s drydock due date. This input should include, but is not limited to, an onsite visit from an appropriately qualified TPO surveyor and a written recommendation to extend the drydock due date.

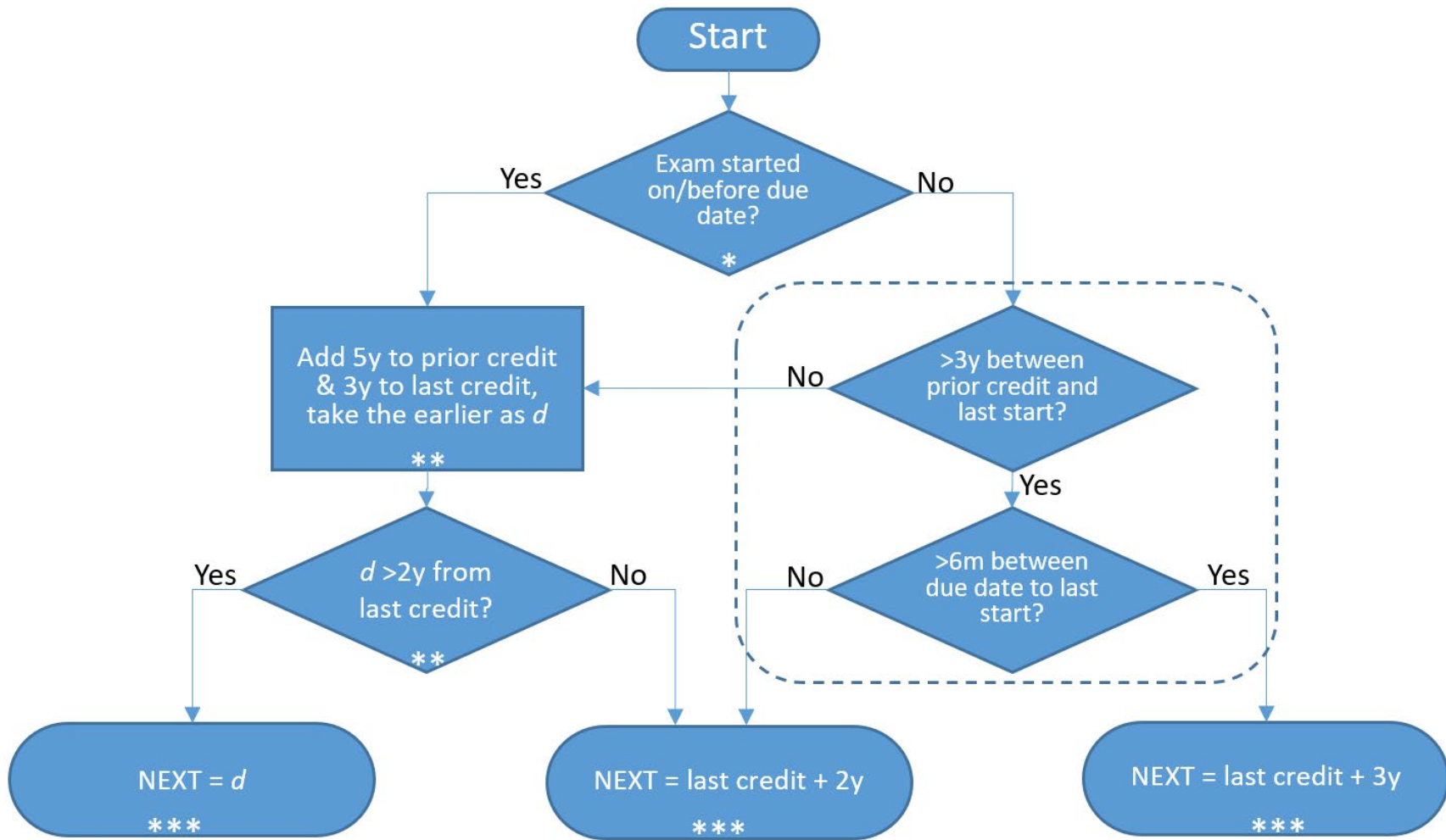
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- b. DDX of less than 90 days may be extended directly by the ACS. Extensions beyond 90 days must be submitted via local OCMI & ACS to CG-CVC-4 for approval at FlagStateControl@uscg.mil.
- c. The ACS and vessel owner/operator should notify the cognizant OCMI whenever drydocking, or internal structural examination surveys are scheduled for MSP Select vessels.

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By direction

Encl: (1) Next Drydock Exam: Examples
(2) "Twice in Five" Process Guide
(3) Drydock Extension Approval Authority

“Twice-in-Five” Process Guide



- * Original due date, or, if extension approved, the extended due date
- ** Credit is the date when all the inspection requirements were met.
- *** Subtract extension used (if any, round to nearest month), then go to last day of month.

Next Exam: Examples

"Once Every Two" Examples*				
No.	Inputs			Next
	Due <i>Ext. due date</i>	Start	Credit	
1.1	28Feb2003	01Feb2003	14Feb2003	28Feb2005
1.2	28Feb2003	01Feb2003	17Mar2003	31Mar2005
When an extension was approved:				
1.3	28Feb2003 <i>31May2003</i>	17Mar2003 <i>Ext. 1 month</i>	25May2003	30Apr2005
1.4	28Feb2003 <i>31May2003</i>	20Apr2003 <i>Ext. 2 months</i>	04Aug2003	30Jun2005
When an exam is not started by the due date:				
1.5	28Feb2003	02Jun2003 <i>Layup: 3 months</i>	04Aug2003	31Aug2005
When an exam is not started by the extended due date:				
1.6	28Feb2003 <i>31May2003</i>	05Nov2003 <i>Ext. 3 months</i> <i>Layup: 5 months</i>	25Dec2003	30Sep2005

*2-year interval used for examples; use same process for other "once in X" intervals

Next Exam: Examples (continued)

"Twice in Five" Examples*						
No.	Prior	Inputs			Next	Controlling Requirement
		Due <i>Ext. due date</i>	Start	Credit		
2.1	01Jun2000	30Jun2003	01May2003	15May2003	30Jun2005	2-in-5y
2.2	01Jun2000	30Jun2003	01May2003	15Dec2003	31Dec2005	NLT 2y
2.3	01Jun2000	30Jun2003	01Apr2002	15Apr2002	30Apr2005	NMT 3
When an extension was approved:						
2.4	01Jun2000	30Jun2003 <i>31Dec2003</i>	30Oct2003 <i>Ext: 4 months</i>	30Dec2004	31Aug2006	NLT 2y (minus ext.)
2.5	01Jun2000	30Jun2002 <i>31Dec2002</i>	31Dec2002 <i>Ext: 6 months</i>	31Jan2003	31Dec2004	2-in-5 (minus ext.)
When the exam is not started by the due date:						
2.6	01Jun2000	30Jun2002	04Aug2002 <i>Layup: 1 month</i>	04Sep2002	30Jun2005	2-in-5
2.7	01Jun2000	30Jun2003	19Oct2003 <i>Layup: 4 months</i>	01Apr2004	30Apr2006	NLT 2y
2.8	01Jun2000	30Jun2003	10Mar2005 <i>Layup: 20 months</i>	28Sep2005	30Sep2008	NMT 3y
When an exam is not started by the extended due date:						
2.9	01Jun2000	30Jun2003 <i>30Sep2003</i>	05Dec2003 <i>Ext. 3 months</i> <i>Layup: 2 months</i>	15May2004	28Feb2006	NLT 2y (minus ext.)
2.10	01Jun2000	30Jun2002 <i>30Sep2002</i>	05Dec2002 <i>Ext: 3 months</i> <i>Layup: 2 months</i>	14Feb2003	31Mar2005	2-in-5 (minus ext.)
2.11	01Jun2000	30Jun2002 <i>30Sep2002</i>	10Mar2005 <i>Ext. 3 months</i> <i>Layup: 29 months</i>	28Sep2005	30Jun2008	NMT 3y (minus ext.)

*Refer to the flow chart in Enclosure (1)

Drydock Extension (DDX) Approval Authority

46 CFR Subchapter	Vessel Service	DDX ≤30 days	30<DDX≤90 days	DDX>90 days	DDX ≤ 6 months	2nd 6 month DDX	DDX ≤ 12 months	DDX > 12 months
D, O, & I	Tank, Freight, & Misc. (including tank barges)	OCMI	District (dp)	COMDT				
H	Passenger	COMDT	COMDT	COMDT				
I-A	MODUs				OCMI	District (dp)		COMDT
L	Offshore Supply	OCMI	District (dp)	COMDT				
R	Nautical School	COMDT	COMDT	COMDT				
U	Oceanographic Research	COMDT	COMDT	COMDT				
K and T	Small Passenger ¹						OCMI	COMDT
M	Towing						OCMI	COMDT
Various	Great Lakes						District (dp)	COMDT

Note 1: Inland passenger vessels on benign routes may obtain DDX up to 30 months duration; requests greater than 12 months must be approved by Commandant.

Note 2: ACP and MSP-Select vessel may request that the ACS extend required statutory surveys for a period of up to 90 days in accordance with the RO's rules, respective agreement with the Coast Guard, and the provisions of SOLAS I/14. The ACS must submit drydock extensions beyond 90 days to CVC-4 at FlagStateControl@uscg.mil.