

STATEMENT OF REAR ADMIRAL CLYDE T. LUSK, JR.

BEFORE THE HOUSE MERCHANT MARINE AND FISHERIES COMMITTEE  
SUBCOMMITTEE ON THE PANAMA CANAL AND THE OUTER CONTINENTAL SHELF

AT WASHINGTON, D.C.

ON OCTOBER 4, 1984

GOOD MORNING MR. CHAIRMAN AND MEMBERS OF THE SUBCOMMITTEE. I AM REAR ADMIRAL CLYDE T. LUSK, JR., CHIEF OF THE OFFICE OF MERCHANT MARINE SAFETY OF THE U.S. COAST GUARD. I HAVE WITH ME CAPTAIN THOMAS TUTWILER, CHIEF OF THE MERCHANT VESSEL INSPECTION DIVISION. I AM PLEASED TO HAVE THIS OPPORTUNITY TO TESTIFY BEFORE THIS SUBCOMMITTEE CONCERNING THE PROPOSED OFFSHORE INSTALLATION EMERGENCY EVACUATION ACT.

H.R. 6291, THE OFFSHORE INSTALLATION EMERGENCY EVACUATION ACT, AS DRAFTED, WOULD REQUIRE THE COAST GUARD TO PROMULGATE REGULATIONS REQUIRING EACH MANNED INSTALLATION ON THE OUTER CONTINENTAL SHELF TO BE PROVIDED WITH A STANDBY VESSEL IN ITS IMMEDIATE VICINITY. IT WOULD ALSO REQUIRE THE COAST GUARD TO PROMULGATE REGULATIONS REQUIRING EACH MANNED INSTALLATION TO BE PROVIDED WITH THE SAFEST POSSIBLE EVACUATION EQUIPMENT TO SUPPLEMENT THE STANDBY VESSEL.

THE COAST GUARD IS OF THE OPINION THAT PROPERLY DESIGNED AND EQUIPPED STANDBY VESSELS IN THE IMMEDIATE VICINITY OF MANNED OCS FACILITIES COULD, IN SOME CASES, IMPROVE SAFETY ON THE OCS. HOWEVER, THE COAST GUARD IS NOT AWARE OF ANY COMPREHENSIVE ANALYSIS WHICH DOCUMENTS THE MAGNITUDE OF IMPROVEMENT NOR A COST/BENEFIT ANALYSIS WHICH IDENTIFIES ITS IMPACT.

IN THE EVENT OF A MAJOR CASUALTY TO A MOBILE OFFSHORE DRILLING UNIT (MODU) OR PLATFORM, THE IMMEDIATE PRESENCE OF A PROPERLY DESIGNED AND EQUIPPED STANDBY VESSEL, MANNED BY A SPECIALLY TRAINED CREW, MIGHT IN SOME CASES INCREASE THE CHANCES OF SURVIVAL OF THE RIG'S CREW MEMBERS. IT IS NOTEWORTHY, HOWEVER, THAT ONE OF THE MAJOR CAUSES OF RIG ABANDONMENT HAS HISTORICALLY BEEN SEVERE WEATHER AND UNLESS THE STANDBY VESSELS ARE DESIGNED TO WITHSTAND THOSE SEVERE CONDITIONS, REQUIRING THEM TO REMAIN ON SCENE WOULD PUT THEIR CREWS AT RISK. THERE ALSO EXISTS THE POTENTIAL FOR A RIG'S CREW MEMBERS TO ATTEMPT TO BOARD THE STANDBY VESSEL UNDER CONDITIONS WHERE THEIR BEST CHANCE OF SURVIVAL WOULD BE THE RIG'S PRIMARY LIFESAVING EQUIPMENT.

THE COAST GUARD HAS CONDUCTED A CURSORY REVIEW OF MAJOR RIG MISHAPS AND OF FALLS OVERBOARD IN THE GULF OF MEXICO TO DETERMINE WHAT EFFECT A STANDBY VESSEL HAD OR MIGHT HAVE HAD ON THOSE ACCIDENTS. THE RESULTS WERE INCONCLUSIVE AS TO WHETHER OR NOT STANDBY VESSELS HAVE, OR COULD HAVE, SIGNIFICANTLY CONTRIBUTED TO REDUCING PERSONNEL INJURIES AND FATALITIES.

THE COAST GUARD IS OF THE OPINION THAT A MODU OR PLATFORM SHOULD BE SELF-SUSTAINING AND CAPABLE OF PROVIDING ITS OWN MEANS OF ABANDONMENT IN THE EVENT OF AN EMERGENCY. IN THIS REGARD, THE COAST GUARD IS CONTINUALLY STRIVING TO IMPROVE THE DESIGN AND LAUNCHING ARRANGEMENT OF PRIMARY LIFESAVING APPLIANCES. THE LATEST DEVELOPMENTS IN THIS FIELD INCLUDE FREE-FALL LIFEBOATS AND LAUNCHING SYSTEMS THAT PUT THE LIFEBOATS IN THE WATER FURTHER AWAY FROM THE RIG THAN CONVENTIONAL LAUNCHING SYSTEMS.

THE REQUIREMENTS FOR PRIMARY LIFESAVING APPLIANCES FOR MANNED PLATFORMS WILL BE UPGRADED THROUGH THE RULEMAKING PROCESS IN A FORTHCOMING REVISION TO 33 CFR SUBCHAPTER N, OUTER CONTINENTAL SHELF ACTIVITIES. THE PROPOSED REQUIREMENTS ARE EXPECTED TO PROVIDE GREATLY IMPROVED RESCUE CAPABILITIES FOR THE GULF OF MEXICO AND THE SOUTHERN CALIFORNIA COAST, PARTICULARLY IN VIEW OF THEIR RELATIVELY WARM WATER TEMPERATURES AND THE PROXIMITY AND DEGREE OF VESSEL AND HELICOPTER TRAFFIC.

FOR REMOTE LOCATIONS OR WHERE COLD WATER CONDITIONS EXIST, SUCH AS IN THE BERING AND BEAUFORT SEAS, THE CONCEPT OF REQUIRING STANDBY VESSELS MAY HAVE MORE MERIT. EVEN THOUGH MODUS OPERATING IN THESE AREAS HAVE THEIR OWN PRIMARY LIFESAVING EQUIPMENT, EVENTUAL RESCUE FROM THAT EQUIPMENT IS NECESSARY. HOWEVER, CONDITIONS IN THE BERING AND BEAUFORT SEAS ARE SUCH THAT IT WOULD BE UNSAFE TO HAVE A VESSEL ON STANDBY UNLESS SPECIFICALLY DESIGNED FOR THOSE CONDITIONS. PROBLEMS ASSOCIATED WITH ICE IN THOSE AREAS WOULD BE PARTICULARLY CHALLENGING.

IN SUMMARY, THE COAST GUARD AGREES THAT STANDBY VESSELS COULD ENHANCE SAFETY OF SOME FACILITIES ON THE OCS. HOWEVER, THE COAST GUARD FEELS STRONGLY THAT TO DO SO THOSE VESSELS MUST BE COAST GUARD CERTIFICATED VESSELS, DESIGNED AND EQUIPPED SPECIFICALLY FOR THE TASK, AND MANNED WITH PROPERLY TRAINED PERSONNEL. WE ARE NOT AWARE OF THE COST-BENEFIT SITUATION RELATIVE TO A REQUIREMENT FOR SUCH VESSELS. THERE MAY BE OTHER RESCUE OR EVACUATION MEASURES THAT WOULD BE MORE EFFECTIVE AND COST-EFFICIENT. IT MAY BE PREFERABLE TO ESTABLISH A PERFORMANCE STANDARD RATHER THAN REQUIRE A SPECIFIC PIECE OF EQUIPMENT SUCH AS A STANDBY VESSEL.

IF IT IS ULTIMATELY DECIDED TO GO FORWARD WITH H.R. 6291, THE COAST GUARD SUGGESTS THAT H.R. 6291 BE AMENDED IN THREE WAYS. FIRST, IT SHOULD PROVIDE A MINIMUM OF 30 MONTHS TO ANALYZE THE INTERRELATIONSHIP BETWEEN A STANDBY VESSEL AND A MANNED FACILITY'S PRIMARY LIFESAVING EQUIPMENT, TO DETERMINE THE COSTS AND BENEFITS OF ALTERNATIVE APPROACHES, AND THUS DEFINE FOR PURPOSES OF RULEMAKING THE APPROPRIATE SCOPE OF THE REQUIREMENT.

SECOND, WE SUGGEST FLEXIBILITY TO WAIVE THE STANDBY VESSEL REQUIREMENT WHERE OTHER MEASURES HAVE BEEN TAKEN TO ENSURE THE SAFETY OF THE CREW.

THIRD, WE SUGGEST THE NEED TO INCLUDE PROVISIONS SUCH THAT THE MASTER OF THE STANDBY VESSEL IS NOT BOUND BY LAW TO REMAIN ON STATION WHEN IN HIS OPINION IT IS UNSAFE TO DO SO.

MISTER CHAIRMAN, THIS CONCLUDES MY STATEMENT. I WILL BE GLAD TO ANSWER ANY QUESTIONS THAT YOU OR MEMBERS OF THE SUBCOMMITTEE MAY HAVE.