



The Bahamas Maritime Authority

BMA INFORMATION BULLETIN No. 96

MAINTAINING PASSENGER SHIPS WATERTIGHT DOORS OPEN DURING NAVIGATION

Guidance and Instructions for Ship-owners, Managers, Masters, Bahamas Recognised Organisations and Bahamas Approved Nautical Inspectors

Note: This Bulletin replaces Instruction to Classification Societies No. 15

1. General

- 1.1. This Bulletin is intended to provide guidance for the processing of an application for an exemption from the requirement to maintain all watertight doors, on a passenger ship, in the “closed” position during navigation.
- 1.2. This Bulletin supplements the procedures for exemption as outlined in BMA Information Bulletin No. 08 and attention of is drawn to our requirement for any application to include the recommendation(s) of our Recognised Organisations.
- 1.3. For the purpose of these guidelines, a “competent person*”, is a person trained in the safe operation of watertight doors. The Authority accepts onboard training and assessment as satisfying this training requirement.
- 1.4. These revised guidelines are applicable to ships constructed on or after 01 January 2007.
- 1.5. Ships with designated watertight doors which were allowed to remain open under the previous version of Instruction to Classification Societies no. 15 shall continue to operate as assigned under that Instruction. However they shall apply for a revision of watertight door status under this Instruction according to a timetable convenient to the Recognised Organisation but no later than 01 January 2009.

* A competent person is one who has achieved a level of technical skill (incorporating theoretical knowledge and practical experience) to be able to complete a task or activity safely and to the specified standard. Refer to BMA Information Bulletin No. 89

- 1.6. Ships not yet assessed for allowance of watertight doors to remain open during navigation shall be subject to an assessment no later than 01 January 2008. The requirement for this assessment only relates to ships that operate with the watertight doors open during navigation. Recognised Organisations are requested to bring this to the attention of Owners.

2. Information required to accompany the Owner's application

Every application must contain the following information:

- i A copy of the vessel's Damage Control plan and/or Fire plans including a list of the affected door.
- ii The requested designation of the door with the categories being:
 - Type "A" - a door that is kept open, OR
 - Type "B" - a door that shall be closed, but may be left opened for the length of time that personnel are working in the adjacent compartment. In the case of the crew accommodation area, the presence of a competent person, in the adjacent compartment will satisfy this requirement, OR
 - Type "C" - a door that shall be closed, but may be opened to permit passage.
Note: The Authority recognises that Companies may already have a system of designating the category of the watertight door. The existing system maybe accepted provided that it is consistent with the categories outlined above.
- iii The Owner's' reason for requiring that each of those doors for which an exemption is requested to be open whilst the ship is under navigation.
- iv Copy of the Company's and shipboard procedures and instructions with respect to the operation of the watertight doors. The instructions must be incorporated in the vessel's safety management system and included in the vessel's operational limitations in accordance with the SOLAS Chapter V requirements.

3. Operational instructions

The Operational instructions shall apply to for the following two (2) situations:

3.1. Potentially hazardous situation

3.1.1. A potentially hazardous condition is defined as being when the ship is on a voyage:

- In conditions of restricted visibility,
- Within port limits or compulsory pilotage limits,
- In any other conditions, which the Master considers potentially hazardous owing to the proximity of underwater hazards having regard to the degree of reliance that can be placed on the chart of the area, the density of traffic or any other relevant factor.

3.1.2. The instructions shall state that while underway in *potentially hazardous situations*, every watertight door shall be closed except when a person is passing through it and if such a door is opened in such circumstances then it shall be closed immediately after passage has been affected. Unless an exemption has been provided.

3.2. **Normal situation**, which is a non-potentially hazardous situation.

3.2.1. The instructions shall specify that *in normal situations*, the doors shall be operated in accordance with the category (See 2.ii), which has been assigned to them.

3.2.2. The instructions shall state that the means of verifying the correct position of all the doors. A copy of the instruction shall be located at the bridge control unit so as to be readily available for the Officer in Charge of the Navigation Watch.

3.2.3. The categorisation (and the meaning of the categorisation) of the door shall clearly be marked either on the door or on the bulkhead adjacent to the door in order to ensure the correct operation of the door.

3.2.4. The categorisation of the door shall be indicated on/near the central operating console (located on the navigation bridge) in order that the correct status of the door can be ascertained.

3.2.5. For all doors, the central operating console's master mode switch shall be in the *local control* mode during normal operations .

4. Examination of applications

- 4.1. When examining the application, the Recognised Organisation shall take into consideration the vessel's operational limitations. The fundamental principle is that all doors are Type C unless the Owner provides necessary justification for requiring the door to be another category.
- 4.2. In assessing applications for other than Type C doors, the Recognised Organisation shall use the following conditions:
- i All doors shall comply with the SOLAS Chapter II-1 requirements, and
 - ii in the case of adjacent machinery spaces, where regular access is required by the engine room watchkeepers in the course of their duties, a door maybe designated a Type B on the proviso that in the event of damage to the affected space, the number of open compartments does not exceed that as allowed by the damage stability requirements, and
 - iii watertight or splash doors that form a part of the primary or secondary escape route maybe categorised as a Type A taking into consideration the factors above, and
 - iv in addition to its principal categorisation A or B, an "hours of use" or "hours of opening" notation may be assigned to any particular door if an Owner so wishes. The BMA recognises, and may accept, the hours of opening as an additional factor that - when linked with patterns of use - may result in a Type B door remaining open during specified periods.
- 4.3. In making a recommendation to the BMA on the appropriate category for each watertight door, the Recognised Organisation shall take account of the following factors:
- 4.3.1. **Watertight Doors, other than those fitted in Machinery Spaces:**
- whether there is a operational need for the door to be kept open;
 - whether a closed door can be opened and then closed again, safely and easily,
 - the proximity of competent person in the adjacent area,
 - Location of watertight doors in passenger and crew accommodation taking into account familiarity with their primary escape route.

4.3.2. Watertight Doors fitted in Machinery Spaces:

- the need to delay the onset of progressive flooding,
- the need for quick and easy surveillance of machinery spaces containing main propulsion machinery, essential auxiliaries, gear boxes, thrust blocks, bilge system. Controllable pitch propellers equipment, electrical power generating plant and fuel preparation and heating equipment; having regard to the fire risk and the critical nature of a machinery failure;
- the increased risk of personnel being trapped by doors, which do not have the facilities for local operation;
- the extent to which fire detecting systems and bilge water level alarms are fitted;
- whether a machinery control room is provided and the degree of remote control and remote surveillance that is possible,
- the proximity of competent person in the adjacent compartment.

5. Submission of an Application to the BMA

- 5.1. Recognised Organisations shall in submitting the application to the BMA, clearly indicate whether they are supportive, or not, of the application and advise of any relevant recommendation(s).
- 5.2. The submission shall include the information in paragraph 2.1.1 and the recommended category of each door.
- 5.3. Classification Societies are reminded that notwithstanding the final decision being the responsibility of the BMA, the owner shall be advised that in order to avoid any delays, all applications shall be submitted via the Recognised Organisations.

6. Recording of Approval

When BMA approval of the application is given, Recognised Organisations shall record the category of the doors on the Damage Control plan and List of Operational Limitations.