



USCG Ninth District Prevention Division
 Inspections and Investigations Branch (DPI)
 Mission Management System (MMS) Work Instruction (WI)



Category	Vessel Inspections, Hull Exams				
Title	DRY-DOCK AND INTERNAL STRUCTURAL EXAM (ISE) EXTENSION REQUESTS FROM U.S. VESSELS THAT OPERATE EXCLUSIVELY ON THE GREAT LAKES				
Serial	D9-WI-DOM-(005)(06)	Orig. Date	10JAN2019	Rev. Date	12DEC2024
Disclaimer:	This document is not a substitute for applicable legal requirements, nor is it itself a rule. It is intended to provide operational guidance for Coast Guard personnel and is not intended to nor does it impose legally binding requirements on any party outside the Coast Guard.				
References:	(a) COMDT (CG-543) Memo to CGDNINE (dp), Serial No. 517, dated May 3, 2012 (b) CVC-WI-029(3) Drydock Examinations (DD) and Drydock Extension (DDX) Policy Clarifications (c) Marine Safety: Marine Inspection Administration, COMDTINST 16000.70 (d) D9-WI-DOM-(002)(03) Alt Internal Structural Exam Program for Great Lakes Vessels				

1. Purpose. To provide a consistent process regarding the extension of a vessel’s drydock and internal structural examination due dates.
2. Action. All Ninth District (D9) Officers in Charge, Marine Inspection (OCMIs) shall ensure compliance with the requirements outlined in this instruction.
3. Directives Affected. D9-WI-DOM-(005)(05) Dry-Dock Extension Requests From U.S. Vessels That Operate on the Great Lakes is hereby cancelled and replaced with this updated instruction.
4. Major Changes. This policy clarifies how OCMIs assess temporary repairs in vessels with open MISLE deficiencies. Additionally, the scope of the internal survey has been updated to exclude the forepeak and aft peak spaces, while incorporating additional mid-body ballast tank spaces. This change in survey locations refocuses the internal examination to areas and spaces relative to the amidships of the vessel to address primary areas of concern relating to hull girder longitudinal strength.
5. Discussion. In reference (a), the Commander, Ninth Coast Guard District is authorized to grant drydock and ISE extensions for Great Lakes vessels due to the unique Great Lakes operating environment and long-standing D9 precedent. Extensions should be considered on a ship-by-ship basis and will be based on the results of a non-credit extension exam, the extent of which should be to the satisfaction of the OCMI and the Commander, Ninth Coast Guard District.

Per references (b) and (c), it is not Coast Guard policy to grant drydock extensions except in the most unusual circumstances. Examples of unusual circumstances are the sudden unavailability of drydock space (e.g., due to high river stage, weather damage to facilities, or of the scheduled drydock facility going out of business), the employment of the vessel where it cannot be replaced without risk, or circumstances clearly beyond the owner's control. Singularly, financial hardship is not a valid reason for granting a drydock extension. However, per reference (a) for vessels

operating on the Great Lakes, the Coast Guard has determined that economic factors may equate to unique circumstances warranting the approval of the drydock extension request.

It is important to note that U.S. Flagged Lakers are on a 5-year drydock and ISE exam schedule, which is the regulatory standard for vessels operating in a freshwater environment. Operating companies should make all reasonable efforts to maintain this 5-year interval and should formulate long-term operating schedules accordingly.

Additionally, specifying the next drydock due date with a 5-year drydock exam schedule following a credit drydock is necessary to synchronize drydock exam and load line exam dates that align with the intent of reference (a). This instruction applies to both the drydock and the ISE portion of the hull exam to remain in alignment with classification surveys. To properly manage industry expectations, it should be clearly conveyed that the drydock and ISE extension request process in no way guarantees receipt of an extension. Each request shall be reviewed on a ship-by-ship basis.

Vessels that are enrolled in Alt Internal Structural Exam Program, per reference (d), are not able to extend their ISE exam dates as part of this instruction and must maintain a 5-year schedule consistent with established intervals as noted by that policy.

6. Environmental Aspect and Impact Considerations. Environmental considerations under the National Environmental Policy Act (NEPA) were examined in the development of this Instruction. This Instruction included preparation of guidance documents that implement, without substantive change, the applicable Command Instruction or other Federal agency regulations, procedures, manuals, and other guidance documents. It is categorically excluded from further NEPA analysis and documentation requirements under Categorical Exclusion (33) as published in COMDITINST M16475.1D, Figure 2-1. An Environmental Checklist and Categorical Exclusion Determination (CED) are not required.
7. Distribution. No paper distribution will be made of this Instruction. An electronic version will be located on the following link: [D9 dpi website](#).
8. Procedure.
 - a. An owner/operator of a U.S. flagged vessel that operates exclusively on the Great Lakes, who desires a drydock and ISE extension for their vessel shall submit an extension request, for a maximum of 365 days, to the Ninth District, Chief, Prevention Division (dp). It is recommended that this request be received between 90 and 365 days in advance of the vessel's next examination due date as indicated on the vessel's Certificate of Inspection (COI). Requests should be made early for timely consideration and to reduce delays. A vessel requesting a drydock extension must also ensure its Load Line (LL) Certificate is extended for an equivalent period by submitting a request for an extension of the vessel's LL Certificate to the American Bureau of Shipping (ABS). The operator may submit one request for a LL and drydock examination extension provided it is sent to both ABS and D9 (dp).
 - b. Drydock and ISE examination extension requests shall include specifics as to why the company cannot meet the required examinations due date or reasons why an extension may otherwise be warranted. Reference (a) allows for the consideration of extensions based on economic factors and for alignment of intervals.

- c. Upon receipt of the extension request, D9 (dp) and the cognizant OCMI shall conduct a record check of the vessel, including a review of deficiencies, any reports of structural failures, and marine casualty history in the MISLE database as well as any available class reports, to ensure there are no outstanding deficiencies or issues that may prohibit the vessel from receiving an extension.
- d. Vessels with identified temporary repairs in MISLE may be required to make permanent repairs prior to receiving an approved drydock extension; areas with previous temporary repairs shall visually re-examined. If not required to make permanent repairs in consideration of receiving an approved drydock extension, the deficiency due date shall be adjusted within MISLE to reflect the extended drydock date. Specifically, in the instance of a structural failure that compromises the vessel's ability to operate safely within its design parameters (Class 1 failure as defined by reference (c)), temporary repairs are only to be permitted to allow vessels to safely transit to repair facilities to affect permanent repair. If new damage or structural failures are discovered during the drydock extension survey, the OCMI shall evaluate if temporary repairs are sufficient, or if permanent repairs are required in their evaluation of the OCMI determination of the drydock extension.
- e. After completion of the records check, D9 (dp) shall contact the vessel operator and direct them to contact the cognizant OCMI to schedule a extension examination. Contact with the vessel operator should occur within 14 days of receipt of the extension request. D9 (dp) shall forward all available information, including a copy of the extension request, to the OCMI conducting the examination. In no case should the extension examination be carried out more than 90 days prior to the drydock and/or ISE examination due date.
- f. The OCMI conducting the extension examination shall ensure the vessel is sufficiently inspected to verify that its structural condition is adequate to allow the vessel to continue in operation for the duration of the extension. At a minimum, this examination shall include an external examination of all visible portions of the hull, an internal examination of the three mid-body ballast tank pairs that are arranged the closest to the vessel midships (approx. 6 ballast tanks total), and two cargo holds. Additionally, any current temporary repairs that remain as open deficiencies shall be reexamined along with any other areas of interest identified during the MISLE history and casualty review. If the vessel is enrolled in Alt Internal Structural Exam Program, per reference (d), the OCMI may consider portions or the majority of the already required yearly internal structural examination as part of the extension examination if those spaces are due in the same period of examination. However, the owner/operator may choose to request a full credit ISE instead of the drydock extension ISE if the due date is approaching and the vessel does not wish to extend.
- g. If voluntarily used, the OCMI shall pay particular attention to the vessels Critical Area Inspection Program (CAIP) booklet (Note that the CAIP Program no longer is a supported Coast Guard oversight program but legacy information and booklets may still be used on a voluntary company status). Some Great Lakes vessels, particularly the 1000 footers, have areas which are prone to repeated failures and distorted structural members due to construction/design flaws and/or environmental stresses on the vessel over time.

The booklets are a management tool for the company, and shall be referenced for past repairs, ongoing repair programs, details of known problem areas, and ABS approved repair methods.

- h. Owners/Operators of vessels enrolled in the Continuous and Early ISE program(s) shall reference D9-WI-DOM-(002)(03) Alternative ISE Program for Great Lakes Vessels.
- i. The attending Marine Inspector (MI) shall also collect a statement or letter signed by the vessel's master, chief engineer, or the person in charge, stating the general overall condition of the vessel, level of maintenance, any known or suspected damage and attesting to the fact that the vessel is in suitable condition for operation during the period of the extension requested.
- j. Dual Mode Integrated Tug Barge units (ATBs) shall be decoupled during the examination to allow the MI to visually inspect high stress areas in way of the tug-barge interface. Push Mode Integrated Tug Barge units (ITBs) may remain coupled. However, the MI shall pay particular attention to the internal structure located around the notch of the barge and, if not satisfied with the condition, may require the unit to be decoupled.
- k. Normally, a dive survey and hull gauging will not be required during a extension examination. However, this policy does not preclude the attending MI from requesting such documentation when he/she questions the structural integrity of the vessel.
- l. The attending OCMI shall send a memo to D9 (dp) summarizing the findings of the extension examination with a recommendation as to whether the extension should be approved. The OCMI shall include the letters obtained from the master or chief engineer with the correspondence. D9 (dp) shall review the recommendation and reply to the operator as to whether the extension is approved. If the extension is approved, the vessel shall be drydocked no later than the date requested, which will be no more than 365 days from the vessel's original next drydock date. D9 (dp) will scan all correspondence into a MISLE administrative activity and provide the OCMI and vessel owner copies of all correspondence. D9 (dp) will also add a special note to the vessel that expires after the approved extension and update the next drydock and/or ISE date in MISLE reflecting the extension. An amended COI may be issued to the vessel by the field unit with the updated drydock date at the OCMI's discretion.
- m. Upon completion of a credit drydock and/or ISE exam, the vessel's next due date shall be listed as the last day of the month that is five years from the date after the vessel is refloated. Since the vessel will commence a new cycle, the owner/operator may apply for extensions of successive drydocks and/or ISEs. For example, if a vessel completes a drydock exam on May 15, 2023, its new drydock date will be May 31, 2028. In this case, a request for an extension until May 31, 2029 may be considered in accordance with this work instruction. After a credit drydock in 2029, the vessel's next drydock date shall be listed as May 31, 2034, and a request for an extension until May 31, 2035 may again be considered.

9. Request For Changes. Questions and comments concerning this policy should be directed to D9 (dpi), by reaching out to the POC at 216-902-6050.



K. A. Broyles
Captain, U.S. Coast Guard
Ninth District Prevention