

Means of Access

Amended Guidance

Guidance for the Survey and Construction of Steel Ships Parts C, CS, and P

Reason for Amendment

- (1) Although SOLAS II-1/Reg.3-6.3.1 specifies that safe access directly from open decks is to be provided to cargo holds, ballast tanks, etc., it specifies that safe access to double bottom spaces or forward ballast tanks may be from pump-rooms, deep cofferdams, pipe tunnels, cargo holds, double hull spaces or similar compartments not intended for the carriage of oil or hazardous cargoes.

Even though the wording “not intended for the carriage of oil or hazardous cargoes” was intended to only apply to “similar compartments”, some people were interpreting it as also applying to “pump-rooms”, “deep cofferdams”, “pipe tunnels”, “cargo holds”, and “double hull spaces”. IACS, therefore, held discussions on ways to clarify the wording and, as a result, adopted UI SC191(Rev.6) in May 2014. UI SC191(Rev.6) clearly states “not intended for the carriage of oil or hazardous cargoes” applies only to “similar compartments” since pump-rooms and the other spaces are not intended to carry oil or hazardous cargoes, etc.

- (2) Paragraph 3.14 of the “Technical Provisions for Means of Access for Inspections” (Resolution MSC.158(78)), which specifies permanent means of access, states that the uppermost entrance section from deck of the vertical ladder providing access to a tank is to comprise a ladder linking platform displaced to one side of the ladder; however, it is not clear which “deck” is meant. IACS discussed ways to clarify which deck and recognized that the intent of the platform is to provide a safe landing place and minimize the risks of falling off the ladder caused by the poor field of vision of persons entering dark tanks directly from open decks located above. As a result, IACS clarified that “deck” means “weather deck” in UI SC191(Rev.6).
- (3) Figure 2 in IACS Recommendation No. 91 “Guidelines for Approval/Acceptance of Alternative Means of Access” illustrates one possible method for fixing portable ladders. On the other hand, IACS Recommendation No.78 “Safe Use of Portable Ladders for Close-up Surveys” specifies various methods for fixing the portable ladders, one of which is the method illustrated in the aforementioned figure. Since there was some concern that “Figure 2” may be misinterpreted as being the only acceptable method for fixing such ladders, IACS decided to remove the figure altogether and adopted Recommendation No.91(Rev.2) in May 2014.

Accordingly, all relevant requirements were amended based upon UI SC191(Rev.6) and Recommendation No.91(Rev.2).

Outline of Amendment

- (1) Clarified the compartments from which access to double bottoms and other spaces may be made.
- (2) Clarified that “deck” means “weather deck” in requirements related to the means of access for tanks requiring vertical ladders with ladder linking platforms.
- (3) Deleted “Figure 2” which is used to illustrate one method of fixing portable ladders.