

Unified Interpretation for Watertight Doors

Object of Amendment

Rules for the Survey and Construction of Steel Ships Part C

Reason for Amendment

IACS developed Unified Interpretation (UI) SC156 in 2002 to provide specifications for watertight doors; these specifications included those for open and close indicators as well as the alarms required by Chapter II-1 of SOLAS. This UI has already been incorporated into the NK Rules up to its latest version UI SC 156(Rev.2).

The IMO adopted amendments regarding the openings in bulkheads below bulkhead decks for passenger ships as Resolution MSC.474(102) in November 2020.

In addition, the IMO adopted amendments regarding those openings not subject to requirements related to survivability for damage stability as Resolutions MSC.491(104) and MSC.492(104) in October 2021, Resolution MEPC.343(78) in June 2022 and Resolution MSC.526(106) in November 2022. These resolutions have already been incorporated into the NK Rules.

In response, IACS adopted UI SC156(Rev.3) in July 2024 to incorporate the above-mentioned five IMO resolutions into the UI.

Accordingly, relevant requirements of NK Rules are amended based upon UI SC156(Rev.3).

Outline of the Amendment

Amends the definition of the open/closed state of watertight doors and the table of requirements for watertight doors.

Effective Date and application

This amendment applies to ships that fall under the following:

- i) those for which the building contract is placed on or after 1 July 2025.
- ii) those for which, in the absence of a building contract, the keels are laid or are at a similar stage of construction on or after 1 July 2025; or
- iii) those for which the delivery of is on or after 1 January 2028.

(This amendment also applies to ships subject to Part C of the Rules for the Survey and Construction of Steel Ships prior to its comprehensive revision.)

ID: DX24-14

Amended-Original Requirements Comparison Table (Unified Interpretation for Watertight Doors)

Amended	Original	Remarks
<p>RULES FOR THE SURVEY AND CONSTRUCTION OF STEEL SHIPS</p> <p>Part C HULL CONSTRUCTION AND EQUIPMENT</p> <p>Part 1 GENERAL HULL REQUIREMENTS</p> <p>Chapter 2 GENERAL ARRANGEMENT DESIGN</p> <p>2.2 Subdivision Arrangement</p> <p>2.2.2 Watertight Door</p> <p>2.2.2.1 General</p> <p>1 All openings in the watertight bulkheads and the part of the deck that forms the step of the bulkheads are to be closed by watertight closing appliances (hereinafter referred to as “watertight doors”). Watertight doors are classified as follows according to their purpose and frequency of use:</p> <p>(1) Watertight doors that are to be permanently closed at sea</p> <p>Such doors are to remain closed at sea. The time of opening <u>such doors in port and of closing them before the ship leaves port</u> is to be authorised by the Master and entered in the logbook. <u>Should such doors be accessible during the voyage, they are to be fitted with</u></p>	<p>RULES FOR THE SURVEY AND CONSTRUCTION OF STEEL SHIPS</p> <p>Part C HULL CONSTRUCTION AND EQUIPMENT</p> <p>Part 1 GENERAL HULL REQUIREMENTS</p> <p>Chapter 2 GENERAL ARRANGEMENT DESIGN</p> <p>2.2 Subdivision Arrangement</p> <p>2.2.2 Watertight Door</p> <p>2.2.2.1 General</p> <p>1 All openings in the watertight bulkheads and the part of the deck that forms the step of the bulkheads are to be closed by watertight closing appliances (hereinafter referred to as “watertight doors”). Watertight doors are classified as follows according to their purpose and frequency of use:</p> <p>(1) Watertight doors that are to be permanently closed at sea</p> <p>Such doors are <u>open in port and closed before the ship leaves port (e.g. bulkhead doors for loading/unloading)</u>. The time of opening/closing <u>such doors is to be recorded</u> in the log-book.</p>	<p>Amend in accordance with IACS UI SC156 (Rev.3) 3.1.</p>

Amended-Original Requirements Comparison Table (Unified Interpretation for Watertight Doors)

Amended	Original	Remarks
<p><u>a device to prevent unauthorised opening.</u></p> <p>(2) Watertight doors that are to be normally closed at sea Such doors are kept closed at sea but may be used if authorised by the <u>Master</u> and are to be closed again immediately after use.</p> <p>(3) Watertight doors that are used at sea Kept closed <u>at sea</u> but may be opened during navigation when authorised by the Administration to permit the passage of passengers or crew, or when work in the immediate vicinity of the door necessitates it being opened. The door, however, is to be immediately closed after use. <u>Watertight doors permitted to be opened during navigation are to be clearly indicated in the ship’s stability information.</u></p> <p>2 Watertight doors as specified in -1 above are to be normally closed at sea, except where deemed necessary for the ship’s operation by the Society. Watertight doors or ramps fitted to internally subdivided cargo regions are to be permanently closed at sea.</p> <p>3 The requirements of 2.2.2 apply to watertight doors required by other regulations regarding damage stability requirements. Watertight doors located above the bulkhead deck are to also comply with the requirements for doors provided for means of escape specified in Chapter 13, Part R.</p> <p>4 The general requirements for watertight doors are shown in Tables 2.2.2-1 and 2.2.2-2.</p>	<p>(2) Watertight doors that are to be normally closed at sea Such doors are kept closed at sea but may be used if authorised by the <u>officer of watch</u> and are to be closed again immediately after use.</p> <p>(3) Watertight doors that are used at sea Kept closed but may be opened during navigation when authorised by the Administration to permit the passage of passengers or crew, or when work in the immediate vicinity of the door necessitates it being opened. The door, however, is to be immediately closed after use.</p> <p>2 Watertight doors as specified in -1 above are to be normally closed at sea, except where deemed necessary for the ship’s operation by the Society. Watertight doors or ramps fitted to internally subdivided cargo regions are to be permanently closed at sea.</p> <p>3 The requirements of 2.2.2 apply to watertight doors required by other regulations regarding damage stability requirements. Watertight doors located above the bulkhead deck are to also comply with the requirements for doors provided for means of escape specified in Chapter 13, Part R.</p> <p>4 The general requirements for watertight doors are shown in Tables 2.2.2-1 and 2.2.2-2.</p>	

Amended-Original Requirements Comparison Table (Unified Interpretation for Watertight Doors)

Amended			Original						Remarks
Table 2.2.2-1 Requirements for Watertight Doors for Internal Openings									Amend in accordance with IACS UI SC156 (Rev.3) Table 1 A II.
Position relative to bulkhead or freeboard deck	Referenced requirement	Frequency of use at sea	Type of door	Remote closure	Open/close indicators	Audible or visual alarms	Notices	Notes	
Below	2.2.2.1-1(3), 2.2.2.1-2, 2.2.2.4-3, 2.2.2.5, 2.2.2.6 and 2.2.3.1-2(2)	Used	Power-operated sliding door	Yes	Yes	Yes (Local)	No	-	
	2.2.2.1-1(2), 2.2.2.5, 2.2.2.8-1 and 2.2.3.1-2(3)	Normally Closed	Sliding, rolling or hinged door	No	Yes	No	Yes	*1, *2 6	
	2.2.2.1-1(1), 2.2.2.4-8, 2.2.2.8-2 and 2.2.3.1-2(4)	Permanently Closed (cargo regions)	Sliding, rolling or hinged door	Prohibited	No	No	Yes	*3, *4, *7	
	2.2.2.1-1(1), 2.2.2.8-2 and 2.2.3.1-2(5)	Permanently Closed (others)	Sliding, rolling or hinged door	Prohibited	No	No	Yes	*3, *4, *7	
At or above	2.2.2.1-1(3), 2.2.2.1-2, 2.2.2.4-3, 2.2.2.5, 2.2.2.6 and 2.2.3.1-2(2)	Used	Power-operated sliding door	Yes	Yes	Yes (Local)	No	*2, *5	
	2.2.2.1-1(2), 2.2.2.5, 2.2.2.8-1 and 2.2.3.1-2(3)	Normally Closed	Sliding, rolling or hinged door	No	Yes	No	Yes	*1, *2 6 , *3	
	2.2.2.1-1(1), 2.2.2.8-2 and 2.2.3.1-2(4)	Permanently Closed	Sliding, rolling or hinged door	Prohibited	No	No	Yes	*3, *4, *7	
<p>*1: If hinged, this door is to be of a single-action type.</p> <p>*2: Under the <i>ICLL</i>, doors separating the main machinery space from a steering gear compartment may be hinged single-action types, provided that the lower sill of such doors is above the Summer Load Line and the doors remain closed at sea while not in use.</p> <p>*3: The time of opening such doors in port and closing them before the ship leaves port is to be entered into the log book in the case of doors in watertight bulkheads subdividing cargo regions.</p> <p>*4: Doors are to be fitted with devices that prevent unauthorised opening.</p> <p>*5: Under <i>MARPOL</i>, hinged watertight doors may be acceptable in watertight bulkheads of the superstructure.</p> <p>*6: Notices are to state "To be kept closed at sea".</p> <p>*7: Notices are to state "Not to be opened at sea".</p>									

Amended-Original Requirements Comparison Table (Unified Interpretation for Watertight Doors)

Amended	Original	Remarks																																			
Table 2.2.2-2 Requirements for Watertight Doors for External Openings		Amend in accordance with IACS UI SC156 (Rev.3) Table 1 B II.																																			
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 10%;">Position relative to bulkhead or freeboard deck</th> <th style="width: 15%;">Referenced requirement</th> <th style="width: 15%;">Frequency of use at sea</th> <th style="width: 15%;">Type of door</th> <th style="width: 5%;">Remote closure</th> <th style="width: 5%;">Open/close indicators</th> <th style="width: 5%;">Audible or visual alarms</th> <th style="width: 5%;">Notices</th> <th style="width: 5%;">Notes</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Below</td> <td><u>2.2.2.1-1(1), 2.2.2.5, 2.2.2.8-2, 2.2.3.2-2 and 2.2.3.2-3</u></td> <td style="text-align: center;">Permanently Closed</td> <td style="text-align: center;">Sliding, rolling or hinged door</td> <td style="text-align: center;">No</td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">*2, *3, *5</td> </tr> <tr> <td rowspan="2" style="text-align: center;">At or above</td> <td><u>2.2.2.1-1(2), 2.2.2.5, 2.2.2.8-1 and 2.2.3.2-2</u></td> <td style="text-align: center;">Normally Closed</td> <td style="text-align: center;">Sliding, rolling or hinged door</td> <td style="text-align: center;">No</td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">*1, *4</td> </tr> <tr> <td><u>2.2.2.1-1(1), 2.2.2.5, 2.2.2.8-2 and 2.2.3.2-2</u></td> <td style="text-align: center;">Permanently Closed</td> <td style="text-align: center;">Sliding, rolling or hinged door</td> <td style="text-align: center;">No</td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">*2, *3, *5</td> </tr> </tbody> </table>	Position relative to bulkhead or freeboard deck		Referenced requirement	Frequency of use at sea	Type of door	Remote closure	Open/close indicators	Audible or visual alarms	Notices	Notes	Below	<u>2.2.2.1-1(1), 2.2.2.5, 2.2.2.8-2, 2.2.3.2-2 and 2.2.3.2-3</u>	Permanently Closed	Sliding, rolling or hinged door	No	Yes	No	Yes	*2, *3, *5	At or above	<u>2.2.2.1-1(2), 2.2.2.5, 2.2.2.8-1 and 2.2.3.2-2</u>	Normally Closed	Sliding, rolling or hinged door	No	Yes	No	Yes	*1, *4	<u>2.2.2.1-1(1), 2.2.2.5, 2.2.2.8-2 and 2.2.3.2-2</u>	Permanently Closed	Sliding, rolling or hinged door	No	Yes	No	Yes	*2, *3, *5	
Position relative to bulkhead or freeboard deck	Referenced requirement		Frequency of use at sea	Type of door	Remote closure	Open/close indicators	Audible or visual alarms	Notices	Notes																												
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<p>*1: If hinged, this door is to be of a single-action type.</p> <p>*2: The time of opening such doors in port and closing them before the ship leaves port is to be entered into the log book.</p> <p>*3: Doors are to be fitted with devices that prevent unauthorised opening.</p> <p>*4: Notices are to state "To be kept closed at sea".</p> <p>*5: Notices are to state "Not to be opened at sea".</p>																																					
EFFECTIVE DATE AND APPLICATION																																					
<ol style="list-style-type: none"> 1. The effective date of the amendments is 1 July 2025. 2. Notwithstanding the amendments to the Amendments, the current requirements apply to ships other than ships that fall under the following: <ol style="list-style-type: none"> (1) for which the contract for construction is placed on or after the effective date; or (2) in the absence of a contract for construction*, the keels of which are laid or which are at <i>a similar stage of construction</i> on or after the effective date; or (3) the delivery of which is on or after 1 January 2028. <p>* "contract for construction" is defined in the latest version of IACS Procedural Requirement (PR) No.29.</p> 3. For ships subject to Part C of the Guidance for the Survey and Construction of Steel Ships prior to its comprehensive revision by Notice No.47 on 1 July 2022 (hereinafter referred to as "old Part C of the Guidance"), and for which into -2 above is either on or after the effective date, this amendment also applies to following requirements. <ul style="list-style-type: none"> C4.3.1-2, old Part C of the Guidance Table C4.3.1-1, old Part C of the Guidance 																																					

Amended-Original Requirements Comparison Table (Unified Interpretation for Watertight Doors)

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<p>Table C4.3.1-2, old Part C of the Guidance C13.3.1-1, old Part C of the Guidance</p> <p>IACS PR No.29 (Rev.0, July 2009)</p> <ol style="list-style-type: none"> 1. The date of “contract for construction” of a vessel is the date on which the contract to build the vessel is signed between the prospective owner and the shipbuilder. This date and the construction numbers (i.e. hull numbers) of all the vessels included in the contract are to be declared to the classification society by the party applying for the assignment of class to a newbuilding. 2. The date of “contract for construction” of a series of vessels, including specified optional vessels for which the option is ultimately exercised, is the date on which the contract to build the series is signed between the prospective owner and the shipbuilder. For the purpose of this Procedural Requirement, vessels built under a single contract for construction are considered a “series of vessels” if they are built to the same approved plans for classification purposes. However, vessels within a series may have design alterations from the original design provided: <ol style="list-style-type: none"> (1) such alterations do not affect matters related to classification, or (2) If the alterations are subject to classification requirements, these alterations are to comply with the classification requirements in effect on the date on which the alterations are contracted between the prospective owner and the shipbuilder or, in the absence of the alteration contract, comply with the classification requirements in effect on the date on which the alterations are submitted to the Society for approval. <p>The optional vessels will be considered part of the same series of vessels if the option is exercised not later than 1 year after the contract to build the series was signed.</p> 3. If a contract for construction is later amended to include additional vessels or additional options, the date of “contract for construction” for such vessels is the date on which the amendment to the contract, is signed between the prospective owner and the shipbuilder. The amendment to the contract is to be considered as a “new contract” to which 1. and 2. above apply. 4. If a contract for construction is amended to change the ship type, the date of “contract for construction” of this modified vessel, or vessels, is the date on which revised contract or new contract is signed between the Owner, or Owners, and the shipbuilder. <p>Note: This Procedural Requirement applies from 1 July 2009.</p>		