

ISM / ISPS MODU HANDBOOK

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1 FORWARD

The ISM/ISPS MODU Handbook is designed to be a management resource for the Rig Manager. It is written from an oversight perspective so the Rig Manager has the information needed to ensure the International Safety Management (ISM) Code and the International Ship and Port Facility Security (ISPS) Code are implemented correctly. It is not intended to be a detailed resource for how the codes are implemented. Instead, it centers on oversight of compliance, certification, auditing, management and reporting in reference to the codes. Since the focus of this handbook is oversight, it will need to be used in conjunction with other manuals, books or references as applicable.

1.1 INTERNATIONAL SAFETY MANAGEMENT (ISM) CODE

The ISM Code evolved through the development of the guidelines on International Standard for Safe Management and Operation of Ships and Pollution Prevention. The mandatory implementation milestones of the ISM Code marked a major breakthrough for the maritime industry. Statutory compliance for safety and environmental management systems of offshore companies and their management onshore had been established. The focus on the vital vessel-shore link had been established under the objectives and terms of the ISM Code.

Recognizing that no two companies are exactly the same, the ISM Code's intentions and content offer wide latitudes to operators toward meeting the requirements of maritime rules and regulations. One of the primary objectives of the ISM Code emphasizes the concept of continuous improvement, which leads to safer and cleaner seas in the future.

1.2 INTERNATIONAL SHIP AND PORT FACILITY SECURITY (ISPS) CODE


The ISPS Code was adopted in conjunction with changes to the International Convention for the Safety of Life at Sea (SOLAS) to enhance maritime security. These new requirements form the international framework through which vessels and port facilities can cooperate to detect and deter acts which threaten security in the maritime merchant sector.

Following the tragic events of 11th September 2001, the Assembly of the International Maritime Organization (IMO) unanimously agreed to the development of new measures relating to the security of ships and of port facilities. Also, adopted were amendments to the existing provisions of the International Convention for the Safety of Life at Sea, 1974 (SOLAS 74) covering Automatic Identification System

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(AIS), marking of the Ship's Identification Number and the carriage of a Continuous Synopsis Record (CSR) among others. Care has been taken to ensure compatibility with the provisions of the International Convention on Standards of Training, Certification and WatchKeeping for Seafarers (STCW). These provisions represent a significant change in the approach of the international maritime industries to the issue of security in the maritime merchant sector.


The importance of cooperation to assist Contracting Governments implement the provisions is fully recognized. Implementation of the provisions will require continuing effective cooperation and understanding between all those involved with ship and port facility operations including ship personnel, port personnel, cargo interests, ship and port management and those in National and Local Authorities with security responsibilities. Existing practices and procedures will have to be reviewed and changed if they do not provide an adequate level of security. In the interests of enhanced maritime security, additional responsibilities may have to be carried by the shipping and port industries and by National and Local Authorities.

Nothing in the ISPS Code shall be interpreted or applied in a manner inconsistent with the proper respect of fundamental rights and freedoms as set out in international instruments, particularly those relating to maritime workers and refugees including the International Labour Organization Declaration of Fundamental Principles and Rights at Work as well as international standards concerning maritime and port workers.

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INTERNATIONAL SAFETY MANAGEMENT CODE (ISM)			

2 INTERNATIONAL SAFETY MANAGEMENT CODE (ISM)

2.1 PURPOSE AND OBJECTIVE

The purpose of this section is to provide the information needed to keep the MODUs operating within the scope and parameters of applicable international or national safety management codes and regulations.

The objectives of this subsection are:

- safety at sea
- prevention of human injury or loss of life
- avoiding damage to the marine environment or Company property.

2.2 INTRODUCTION

The ISM Code requires that Companies establish safety objectives and, in addition that the Companies develop, implement and maintain a Safety Management System (SMS) which includes functional requirements of the ISM Code.

The application of the ISM Code should support and encourage the development of a safety culture. Success factors for the development of a safety culture are, among other things, a commitment to values and beliefs.

2.3 SCOPE

The handbook applies to all Transocean Mobile Offshore Drilling Units (MODUs). A MODU is defined by SOLAS as a mechanically propelled vessel, not on location and capable of engaging in drilling operations for the exploration or for exploitation of resources beneath the seabed, such as liquid or gaseous hydro carbons, sulphur or salt. In addition, the handbook also applies to all Transocean MODUs which operate in a Coastal State that mandates ISM and/or ISPS certification. For further clarification, a rig class certificate will indicate its certification as self-propelled or non self-propelled.


2.4 RELATIONSHIPS

In this section we will discuss the role of the Flag State and Port State, but focus primarily on two categories of people, those onshore and those on the MODU. When needed, specific responsibilities or functions will be highlighted. This approach has been taken because safety and environmental protection is the responsibility of everyone in the company.

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2.4.1 Company

The company, as a whole, is responsible to the Flag State, Port States it visits, and its employees to have, and maintain, a Safety Management System, emphasizing self regulation, safety and environmental protection policies.

2.4.2 Flag State

The Flag State, as a signatory to ISM, is bound to enforcement of the ISM Code on MODUs that fly its flag. This enforcement translates to regulations, audits and inspections to ensure compliance. This responsibility applies regardless of whether flag personnel conduct their own surveys or if it is appointed to a Recognized Organization (RO), such as DNV for Transocean MODUs. The Flag State should investigate casualties and monitor the effectiveness of the ROs that act on its behalf. A Flag State has the right to de-register a MODU that fails to meet and maintain convention standards.

2.4.3 Administration

Administration officials of a MODU's Port State can board the MODU at any time without invitation and have open access. But, in the port of another state, an invitation aboard is required. These will normally be undertaken as port state control inspections via a Memorandum of Understanding (MOU) or arrangements with the MODU's Flag State. However, if significant problems arise, the Port State can impose additional rules and regulations upon foreign MODUs which include expulsion, detention or seizure depending on the infraction.


Transocean Administration Personnel onshore are as follows:

- A. The Rig Manager will be the primary contact with the MODU on issues and incidents falling under safety or environmental protection.
- B. The Designated Person (DP) onshore is a direct contact between the company and the MODU with access to the highest levels of management. They are charged with the responsibility and authority to monitor the safety and pollution prevention aspects of the operation of each MODU they are designated to, ensuring that adequate resources and shore-based support are applied as required.

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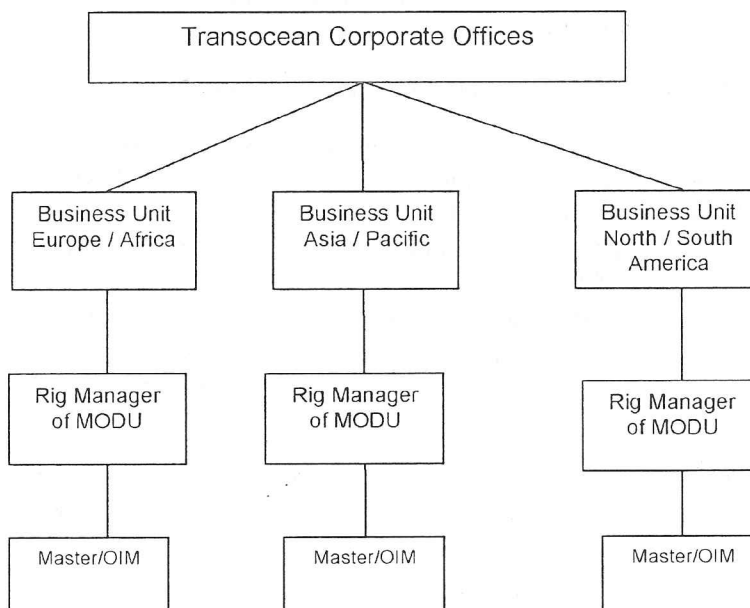
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Transocean Administration onboard the MODU are as follows:

- A. The Master is the overall responsible person on the MODU when it is underway and/or moving to another location. He must be properly qualified, fully conversant with the Management System, give appropriate orders and instructions in clear and simple terms, verify requirements are observed, and review the Management System and report its deficiencies to shore-based management. He is charged with ensuring the implementation of safety policies and procedures.
- B. The Offshore Installation Manager (OIM) is the overall responsible person for the day to day operation of the MODU while it is drilling and therefore must work with the Master in ensuring safety practices and environmental protections are followed since most of the personnel on the MODU work under his charge. He is also charged with ensuring the implementation of safety policy and procedures.


Figure 2.1, ISM Corporate Structure as Related To the MODUs



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2.5 VERIFYING COMPLIANCE - ADMINISTRATION

2.5.1 Company Safety and Environmental Protection Policy

Compliance with the requirements of the ISM Code requires Companies to develop, implement and maintain an SMS to ensure that the safety and environmental protection policies of the Company are implemented. These policies should include the objectives defined by the ISM Code.

Administrations should verify compliance with the requirements of the ISM Code by determining if:

- Transocean's SMS conforms to the requirements of the ISM Code.
- The SMS ensures mandatory rules, regulations, applicable codes, guidelines, and standards recommended by the flag administrations, classification society and maritime industry organizations used by Transocean are taken into account.

NOTE: The Transocean Company Management System (CMS) is considered a SMS and all references to the SMS found in this handbook can be considered references to the CMS.

2.5.2 General Safety Management Objectives

The verification should support and encourage the Company in achieving the general safety management objectives. The ISM Code identifies general safety management objectives as the following:


- To provide for safe practices in ship operation and a safe working environment.
- To establish safeguards against all identified risks.
- To continuously improve the safety management skills of personnel onshore and onboard, including preparing for emergencies related both to safety and environmental protection.

These objectives provide clear guidance to Transocean for the development of safety management system elements in compliance with the ISM code.

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2.5.3 Specific Safety Management Objectives

The main criteria which should govern compliance with the requirements of the ISM Code should be the ability of the SMS to meet the specific requirements defined by the ISM Code in terms of specific standards of safety and pollution prevention.

The specific standards of safety and protection of the environment specified by the ISM Code are:

- Compliance with mandatory rules and regulations.
- Applicable codes, guidelines and standards recommended by the organization administrations, classification societies, and other maritime industry organizations are taken into account.

2.5.4 Records

All records having the potential to facilitate verification of compliance with the ISM Code must be open to scrutiny during an examination. For this purpose, the Administration should ensure that the company provide auditors with statutory and classification records relevant to the actions taken by the company to ensure that compliance with mandatory rules and regulations is maintained. In this regard, the records may be examined to substantiate their authenticity.

Some mandatory requirements may not be subject to statutory or classification surveys, such as:

- Maintaining the condition of ship and equipment between surveys.
- Certain operational requirements.

Specific arrangements may be required to ensure compliance and to provide for the objective evidence needed for verification in these cases, such as:

- Documented procedures and instructions.
- Documentation of the verification carried out by senior officers of day to day operation when relevant to ensure compliance.


2.5.5 Non Conformities / Corrective Action

The Master/OIM must report any "Non-Conformity" to the Rig Manager for his respective MODU. The report includes what type of corrective action the crew should accomplish to improve or avoid the non-conformity in the future. Additionally, the Master/OIM must report to the proper DNV representative the following:

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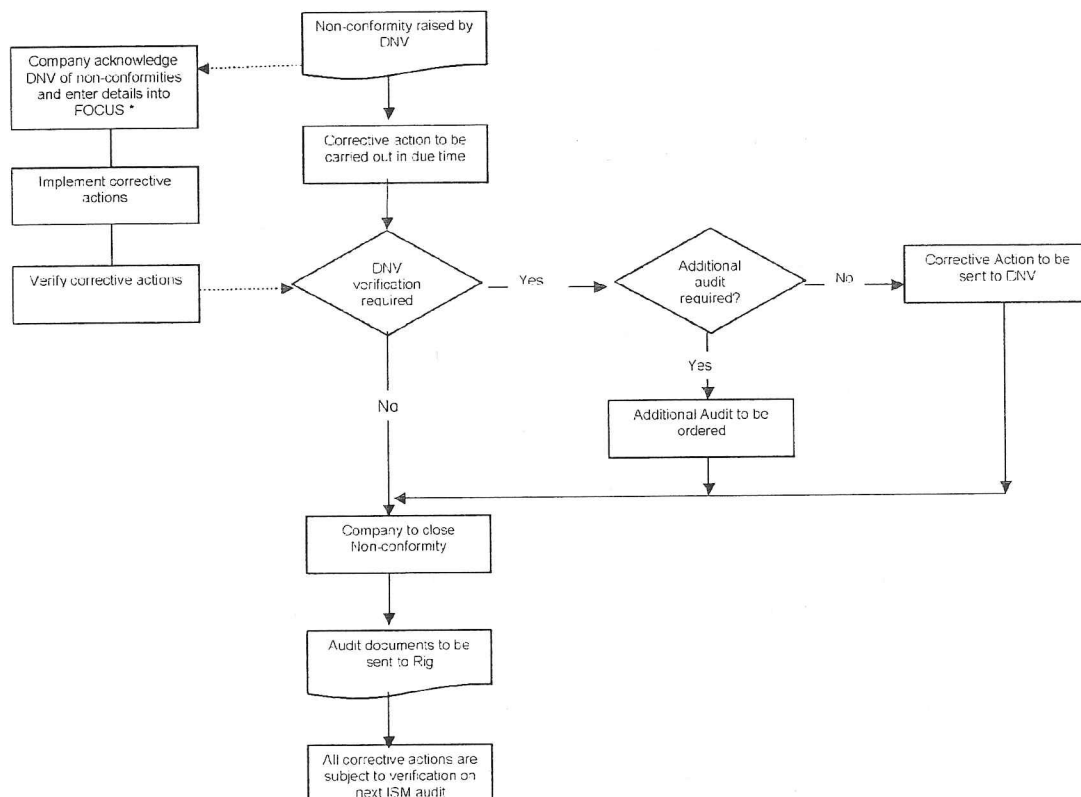
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- a corrective action plan with timelines for close out.
- notification of completion of corrective actions in the plan.

Figure 2.2, Actions Taken On Receipt of Non-Conformity




*Acknowledgement as per 2.5.5

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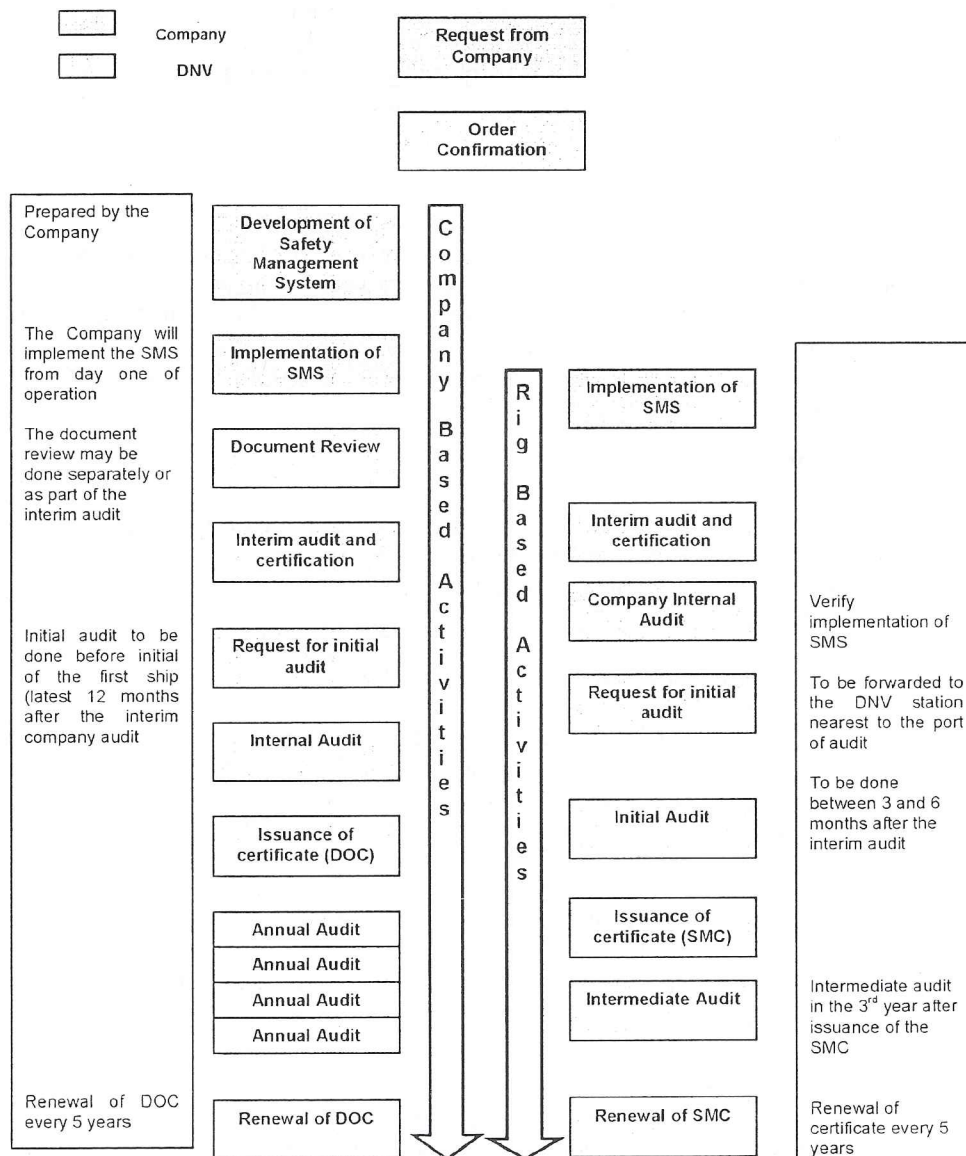
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2.6 CERTIFICATION AND PERIODIC VERIFICATION


Figure 2.3, Initial ISM Certification - Process Flowchart



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2.6.1 Document of Compliance (DOC)

The Document of Compliance should be issued by the Administration, by an organization recognized by the Administration or, at the request of the Administration, by another Contracting Government to the Convention to any Company complying with the requirements of the ISM Code for a period specified by the Administration which **should not exceed five years**. Such a document should be accepted as evidence that the Company is capable of complying with the requirements of the ISM Code.

2.6.2 Vessel Types

The DOC is only valid for the vessel types explicitly indicated in the document. Such indication should be based on the types of vessels on which the initial verification was based. Other vessel types should only be added after verification of the Company's capability to comply with the ISM requirements applicable to such vessel types. In this context, vessel types are those referred to in regulation IX/1 of the Convention.

2.6.3 DOC Validity

The validity of a DOC should be subject to **annual verification** by the Administration or by an organization recognized by the Administration or, at the request of the Administration, by another Contracting Government within three months before or after the anniversary date.

2.6.4 Placement of DOC

A copy of the DOC must be placed on board in order that the Master of the MODU, if so requested, may produce it for verification by the Administration or by an organization recognized by the Administration or for the purposes of control referred to in regulation IX/6.2 of the Convention. The copy of the Document is not required to be authenticated or certified.

2.6.5 Interim DOC (IDOC)


An Interim Document of Compliance may be issued to facilitate initial implementation of the ISM Code when:

- A Company is newly established; or
- New ship types are to be added to an existing DOC, following verification, provided the company demonstrates plans to implement an SMS meeting the

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full requirements of the ISM Code within the period of validity of the IDOC. Such an IDOC should be issued by the Administration, by DNV or another Contracting Government for a **period up to 12 months**. A copy of the IDOC should be placed onboard in order that the Master of the MODU, if so requested, may produce it for verification by the Administration or organization recognized by the Administration. The copy of the Document is not required to be authenticated or certified.

Examples of Transocean's Document of Compliance (DOC) certificates are shown in Figure 2.4 and 2.5.

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Figure 2.4, Document of Compliance – Page 1 - Example



DET NORSKE VERITAS

DOCUMENT OF COMPLIANCE

Issued under the provisions of the INTERNATIONAL CONVENTION FOR THE SAFETY OF LIFE AT SEA, 1974, as amended

Under the authority of the Government of

THE REPUBLIC OF LIBERIA

by Det Norske Veritas AS

Document No.
D185724-980425F-LBR
Date of issue:
2008-04-25

Particulars of Company

<p>Company Name (as per ISM Code sec. 1.1.2)</p> <p>Company Address (as per ISM Code sec. 1.1.2)</p> <p>Company Identification Number (as per ISM Code sec. 1.1.2)</p> <p>Branch office</p>	<p>Transocean Offshore Deepwater Drilling Inc. Four Greenway Plaza Houston, Texas 77046 USA</p> <p>1859554 Transocean Offshore Deepwater Drilling Inc., North American Branch Office, Houston, Texas, USA Transocean Borealis Ltd., Macao - R.T. Brazil Transocean Eastern Pte Ltd., Singapore Service Petroliers Sedco Forex, Montpellier, France</p>
---	--

THIS IS TO CERTIFY

that the safety management system of the Company has been audited and that it complies with the requirements of the International Management Code for the Safe Operation of Ships and for Pollution Prevention (ISM Code) for the types of ships listed below.

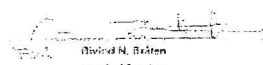
Mobile Offshore Drilling Unit (MODU)
Oil Tanker
Other Cargo Ship

This Document of Compliance is valid until 2012-01-25, subject to periodic verification.

Completion date of audit on which this Certificate is based: 2007-01-23

Issued at Hovik, Norway on 2008-04-25

for Det Norske Veritas AS



David N. Bråten
Head of Section

DET NORSKE VERITAS AS, Veritaskveien 1, NO-2007 Hovik, Norway. Tel: +47 63 80 00 00 Fax: +47 63 80 00 01 E-mail: info@dnv.no www.dnv.no
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Flag State

Transocean are administered by the following Flag States:

- USCG
- Marshall Islands
- Bahamas
- Panama
- Vanuatu

List of Branch offices

Audits will be conducted at each Branch office for DOC compliance

Validation expiration date

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INTERNATIONAL SAFETY MANAGEMENT CODE (ISM)

Figure 2.5, Document of Compliance – Page 2 - Example

Signature of auditor and official stamp of Audit Company

Subsequent annual verifications

Certificate No: D105724-898426F LBR
Date of Issue: 2008-04-25


ENDORSEMENT FOR ANNUAL VERIFICATION

THIS IS TO CERTIFY:
that at the periodical verification in accordance with regulation IX/8.1 of the Convention and paragraph 13.4 of the ISM Code, the safety management system was found to comply with the requirements of the ISM Code.

Anniversary date is: 25 January Range: 15 October - 15 April

*Renewal range is three (3) months prior to DCC expiration

1st Annual Verification Place: Houston Date: 2008-04-10



Stamp

CONFIRMED CARRIED OUT

DAVID L. R. R.

Signature:

Surveyor: Det Norske Veritas AS

2nd Annual Verification Place: _____ Date: _____

Stamp _____ Signature: _____ Surveyor: Det Norske Veritas AS

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2.6.6 Safety Management Certificate (SMC)

The SMC should be issued to a MODU following an initial verification of compliance with the requirements of the ISM Code. This includes the verification that the DOC for the Company responsible for the operation of the vessel is applicable to that particular type of vessel, and assessment of the SMS onboard the MODU is verified to comply with the requirements of the ISM Code, and that it has been implemented. The SMC is valid for a period of five years.

2.6.7 Objective Evidence

Objective evidence demonstrating that the Company's SMS has been functioning effectively for at least three months on board the MODU should be available, including, among other things, records from the internal audit performed by the Company.

2.6.8 Intermediate Verification

The SMC is subject to at least one intermediate verification confirming the effective functioning of the SMS, and that any modifications carried out since the previous verification comply with the requirements of the ISM Code. In certain cases, particularly during the initial period of operation under the SMS, the Administration may find it necessary to increase the frequency of the intermediate verification. Additionally, the nature of non-conformities may also provide a basis for increasing the frequency of intermediate verifications.

If only one intermediate verification is to be carried out, then it should take place between the second and third anniversary dates of the SMC issue date.

2.6.9 Renewal

Renewal of the SMC for a further period of five years should include an assessment of all elements of the SMS pertaining to that MODU and its effectiveness in meeting the objectives specified in the ISM Code.


2.6.10 Interim SMC (ISSC)

An Interim SMC, valid for not more than six months, may be issued to new MODUs on delivery, or when a Company takes on the responsibility for the management of a MODU which is new to the company. In special cases the Administration may extend the validity of the Interim SMC for a further six months.

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Before issuing an Interim SMC, the Administration should verify that:

- The DOC, or the IDOC, is relevant to that MODU.
- The SMS provided by the Company for the MODU includes key elements of the ISM Code and has been assessed during the audit for issuance of the DOC or demonstrated for issuance of the IDOC.
- The Master and relevant senior officers are familiar with the SMS and the planned arrangements for its implementation.
- Instructions which have been identified as essential to safety prior to sailing have been provided and given.
- Plans for company audit of the MODU within three months exist.
- The relevant information on the MODU is given in the working language or languages understood by the MODU's personnel.

Examples of Transocean's Safety Management Certificates (SMC) are shown in Figure 2.6 and 2.7.

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Figure 2.6, Safety Management Certificate – Page 1 – Example



DET NORSKE VERITAS

SAFETY MANAGEMENT CERTIFICATE

Issued under the provisions of the INTERNATIONAL CONVENTION FOR THE SAFETY OF LIFE AT SEA, 1974, as amended
under the authority of the Government of

THE REPUBLIC OF LIBERIA

by Det Norske Veritas AS

Certificate No:
025938080629F
Date of issue:
2008-08-29

Particulars of ship

Name of ship:	"CAJUN EXPRESS"
Distinctive number or letters:	SLXL3
Port of registry:	MONROVIA
Type of Ship:	Mobile offshore drilling unit
Gross tonnage:	23997
IMO number:	8764845

Particulars of Company

Company Name:	Transocean Offshore Deepwater Drilling Inc.
Company Address:	Four Greenway Plaza Houston, Texas 77045 USA
Company identification number:	1359354

THIS IS TO CERTIFY
that the safety management system of the ship has been audited and that it complies with the requirements of the International Management
Code for the Safe Operation of Ships and for Pollution Prevention (ISM Code), following verification that the Document of Compliance for the
Company is applicable to this type of ship.


This Safety Management Certificate is valid until: 2013-07-09, subject to periodic verification and the validity of the Document of Compliance
remaining valid.

Completion date of audit on which this Certificate is based: 2008-07-09

Issued at Havik, Norway on 2008-08-29.

for Det Norske Veritas AS

Olivind N. Braten
Head of Section



Certificate number and date of issue

IMO number

Validation expiration date

Completion date of audit

Signature and official stamp of auditing company

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
	ISM / ISPS MODU HANDBOOK HQS-HSE-HB-02	SECTION:	2
		SUBSECTION:	N/A
INTERNATIONAL SAFETY MANAGEMENT CODE (ISM)			

Figure 2.7, Safety Management Certificate – Page 2 – Example

Certificate No: 025038/080829F
Date of issue: 2008-08-29

Endorsement for periodical verification and additional verification (if required)
THIS IS TO CERTIFY:
that at the periodical verification in accordance with regulation IX/6.1 of the Convention and paragraph 13.3 of the ISM Code, the safety management system was found to comply with the requirements of the ISM Code.

Intermediate Audit range:	2010-07-09	to	2011-07-09
Intermediate Verification ¹ :	Place:		Date:
Stamp:	Signature: Surveyor, Det Norske Veritas AS		
Additional Verification ¹ :	Place:		Date:
Stamp:	Signature: Surveyor, Det Norske Veritas AS		
Additional Verification ¹ :	Place:		Date:
Stamp:	Signature: Surveyor, Det Norske Veritas AS		
Additional Verification ¹ :	Place:		Date:
Stamp:	Signature: Surveyor, Det Norske Veritas AS		



¹ To be completed between the second and third anniversary dates.
If applicable, reference is made in the relevant provisions of section 3.2 'Initial Verification' of the Revised Guidelines on Implementation of the International Safety Management Code.


Intermediate
audit range
between
2nd and 3rd
anniversary

Additional
verifications

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2.7 RENEWAL VERIFICATION

When the renewal verification is completed, (within three months before the expiration date of the existing DOC or SMC) the new Document of Compliance or the new Safety Management Certificate should be valid from the date of completion of the renewal verification for a period not exceeding five years from the date of expiration of the existing Document of Compliance or Safety Management Certificate.

When the renewal verification is completed more than three months before the expiration date of the existing Document of Compliance or Safety Management Certificate, the new DOC or the new SMC should be valid from the date of completion of the renewal verification for a period not exceeding five years from the date of completion of the renewal verification.

2.8 SUSPENSIONS AND WITHDRAWAL

2.8.1 Document of Compliance

The Document of Compliance may be withdrawn or suspended by the Administration or, at its request, by the Contracting Government which issued the Document when the annual verification required in the ISM Code is not requested or if there is evidence of major non-conformities with the ISM Code.

2.8.2 Safety Management Certificate

Only the issuing Administration may withdraw the SMC. The issuing Administration should withdraw the SMC, if intermediate verification is not requested or there is evidence of major non-conformities with the ISM Code.

NOTE: All associated Safety Management Certificates and/or Interim Safety Management Certificates could also be withdrawn if the DOC is withdrawn.

2.9 MAINTAINING COMPLIANCE / VERIFICATION


2.9.1 Internal Audits

Management conducts internal audits to verify that the Company Management System and applicable MODUs are compliant with the requirements of the International Safety Management (ISM) and International Ship and Port Security (ISPS) Codes. (Refer to Performance Monitoring Audit and Assessment Procedures,

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HQS-CMS-PR-02, Section 4, ISM/ISPS Internal Audit, for organization and implementation of internal audits).

Transocean has established procedures that ensure the MODU is maintained in conformity with the provisions of the relevant rules and regulations and with any additional requirements which may be established by the Company, Recognized Organization, Flag or Coastal State.

The key to maintaining compliance is ensuring the company is periodically evaluating the efficiency of and, when needed, review of the SMS in accordance with established procedures. These procedures should be understood by all who have a role in the implementation and performance of safety in the company and on the MODU.

Annual internal audit, review and evaluation should be conducted by individual(s) independent of the areas being audited. The results of the audits and reviews should be brought to the attention of all personnel having responsibility in the area involved.

2.9.2 ISM/ISPS Internal and External Audit Frequency Requirements


Figure 2.8, Audit Frequency Requirements

Location	Certificate	Internal Audit Frequency	External Audit Frequency
Corporate Headquarters	DOC	Annual: within three months prior to annual external audit	Annual: +/- three months of anniversary date. Renewal: within six months prior to certificate expiration (five years from issue)
ISM Branch Office	Noted on Corporate DOC	Periodic: within three months prior to external audit	Periodic – As agreed with Flag State or Administrator (e.g., DNV), minimum once within validity of DOC
ISM Certified MODU	SMC	Annual	Intermediate – between second and third anniversary date of SMC issue Renewal – within six months prior to SMC expiration (five years from issue)
ISPS Certified MODU	ISSC	Annual	Intermediate – between second and third anniversary date of ISSC issue Renewal – within six months prior to ISSC expiration (five years from issue)

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2.9.3 Non Compliance Information Received Direct From Flag State as Per Legislation and Regulations

If a MODU is found to be non-compliant with the ISM or ISPS Code, the Flag State has the authority to invalidate the MODU's certificate and all other associated certificates. As a result of that action, the Flag State will also remove the MODU from its registry thus preventing it from trade, impose a penalty up to \$50,000 per MODU and raise a lien against the MODU based upon imposed penalty. In addition, the Port State Control Authority (coastal state) would detain the MODU until re-certification can be obtained.


2.9.4 Reporting

The Master/OIM should report to the Rig Manager all occurrences of incidents, hazardous situations, spills, environmental incidents, injuries and/or fatalities in accordance with the Health and Safety Policies and Procedures, HQS-HSE-PP-01, and the Environmental Policies and Procedures, HQS-HSE-PP-02.

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3 INTERNATIONAL SHIP AND PORT FACILITY SECURITY CODE

3.1 PURPOSE AND OBJECTIVE

The purpose of this section is to provide the information needed to ensure MODUs operate within the scope and parameters of the international or national security codes and regulations that apply.

The objectives are to:

- Establish a system of oversight to provide cooperation between the Rig Manager, Offshore Installation Manager, Ship Security Officer (SSO), Business Unit Company Security Officer (CSO), Corporate CSO, Government agencies, local administrations and shipping and port industries with respect to security of the MODU;
- Provide early and efficient collection and exchange of security-related information at all security levels, prior to and during transits, or when entering port;
- Ensure proper documentation and request of internal and external security functions and reporting on the MODU.

3.1.1 Introduction

This handbook is concerned with ensuring MODUs are in compliance with the ISPS Code. It should be stressed that, even though a MODU is predominately stationary for long periods, it must remain compliant under the regulations of the ISPS Code, because of its ability to self-propel. Therefore, it is imperative that Rig Managers maintain an oversight to all aspects of compliance and certification during periods of stationary operations.

3.1.2 Application

The purpose of the handbook is to ensure that all Transocean MODUs classified by a class society as 'self propelled', and all other MODU types operating in a coastal state that mandates ISPS certification, comply with the ISPS Code.


3.2 SCOPE

The handbook applies to all Transocean Mobile Offshore Drilling Units (MODU). MODU is defined by SOLAS as a mechanically propelled vessel, not on location and capable of engaging in drilling operations for the exploration or for exploitation of resources beneath the seabed, such as liquid or gaseous hydro carbons, sulphur or

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salt. In addition, the handbook also applies to all Transocean MODUs which operate in a Coastal State that mandates ISM and/or ISPS certification. For further clarification, a rig class certificate will indicate its certification as self-propelled or non self-propelled.

3.3 RELATIONSHIPS

This section gives an overview of the relationships, responsibilities and control measures of persons involved with security. These relationships may overlap under certain circumstances or may be joint actions on the part of several responsible individuals. The information below outlines the roles and responsibilities for each element of the relationship.

3.3.1 Regulatory

The regulatory relationship is developed from the ISPS Code and Flag State regulations. The handbook concentrates on the MODU's interaction with outside authorities for the purpose of inspections and audits.

3.3.2 Port State


When the MODU is entering the littoral waters of another Flag State, or when entering a foreign port, the Port State authorities may request to board the MODU. The Master should receive notice prior to boarding, with an indication as to the purpose of the inspection. These inspections form part of an audit and can vary in their purpose, and professionalism. They may include requests to see fire or security drills, paperwork or documentation, including those parts of the Ship Security Plan (SSP) that are not considered confidential. In all cases, the MODU must comply to the extent required with Port State authorities in the performance of their duties. However, it is equally important to know what they should not request or be shown:

- Restricted proprietary information, confidential or security sensitive information.
- Anything that would endanger the crew or the MODU and its operations.
- Restricted proprietary information, sensitive security information or the confidential portions of the SSP without notification to the Business Unit CSO. It is possible that a MODU may be directed to comply by the MODU's Flag State, but only in situations where there are obvious deficiencies. This direction should come through the Business Unit or Corporate CSO.

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3.3.3 Flag Administration

The Flag State is primarily focused on giving legitimacy to the MODU in its purpose as an industry regulatory authority. Transocean Flag States are widely recognized and legitimate in their role as a flag entity. However, requirements between Flag States vary, and differences will be discussed in other sections of this guide. For relationship purpose, the MODU must know, and follow, the guidance from the Flag State it is administered by on all matters relating to ISPS.

3.3.4 Company (Transocean)

Regarding security matters the company is represented by the Business Unit CSO, who is responsible for all MODUs within his area. The Business Unit will provide the initial point of contact for all security matters, including the following:

- Security resource availability and procurement
- Security concerns or questions
- Advise on security matters that require outside assistance
- Security assessment or review and update of security plan
- Internal Audits

3.3.5 MODU

The MODU reporting responsibility is to the Business Unit CSO, the Flag State, Port State and any Recognized Security Organizations (RSO) that act on behalf of the Flag State. This relationship centers on the MODU and all of its security personnel, primarily the SSO, ensuring their regulatory responsibilities are maintained along with the situational reporting and documentation required by the regulatory entity.

3.3.6 Recognized Security Organization (RSO)

The RSO works on behalf of the Flag State, or at the request of the company. They are very much Subject Matter Experts (SMEs) in all aspects of maritime security and their responsibilities include surveys, inspections, risk assessment, legislation and MODU operations.

3.3.7 Security Contractor


A Security Contractor can accomplish and/or assist in the following:

- Ship Security Assessments (SSA)
- Develop and/or review Ship Security Plans (SSP)

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- Conduct security audits
- Security training for all crew members including SSO/CSO
- Conduct or advise on security drills and exercises
- Provide route, region, city or port specific threat and risk assessments
- Provide onboard ship security teams or consultants
- 24 hour SSAS monitoring
- Advice on Flag State and Coastal State regulations

3.4 RECORDS

3.4.1 Documentation

Documentation is of one the most important areas of security, and will always be scrutinized during any audit or inspection. During any flag security audit, or inspection, valuable time can be saved by ensuring that all the relevant documentation is in place, and up to date.

The benefits include, the all important 'first impression', and 'demonstration of professionalism'.

3.4.2 Company Records

To explain the documentation required, we must first lay the groundwork that must be used in documenting security events. It is company policy that all security documentation shall be retained by the MODU and Business Unit CSO for seven years.

All Security and reporting documentation should contain the following information:

A. Training


Each time a training session is conducted, whether done internally by the SSO or by an outside source, the following information is to be documented:

- Date
- Length of training
- Description of training
- List of Attendees

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B. Drills and Exercises

Each drill and exercise is to be documented, to include:

- Date
- Length of drill or exercise
- Description of drill or exercise
- List of participants
- Best practices and lessons learned which may improve the SSP

C. Incidents and Breaches of Security

A large portion of criminal and terrorist patterns are identified by documentation of minor incidents and breaches. Every incident, breach of security, or occurrence involving security, no matter how small or unimportant, is to be documented. When documenting the following information is included, as a minimum:

- Date and time of occurrence
- Location of occurrence within the MODU
- Description of incident or breach
- Who reported the incident
- To whom the incident was reported
- Description of the response
- Measures taken to better protect the MODU from the same type of incident.

D. Changes in Security Levels

When the SSO receives notification of a change to the current security level the following information is to be documented in the Ship's log book:

- Date and time notification was received
- Time of compliance with additional requirements to meet the new security level

E. Maintenance, Calibration, and Testing of Security Equipment


For each occurrence of maintenance, calibration, or testing the following information is to be documented:

- Date and time
- Specific equipment involved
- Who it is conducted by

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- Findings

F. Security Threats

Whenever a threat to the security of the MODU is received the following information must be documented:

- Date and time of threat
- How threat was communicated
- Who received or identified the threat
- Description of the threat
- Whom it was reported to
- Description of the response

G. Declaration of Security (DOS)

Retain a copy of each single visit DOS and copies of each continuing DOS for at least 90 days after the end of its effective period.

H. Annual Audit of the SSP

For each annual internal audit, retain copy of audit report onboard for seven years. The report must be signed and dated by lead auditor and SSO. A copy of the signed report must be forwarded to the Business Unit CSO.

3.5 CERTIFICATION

All MODU certification must be reviewed and kept up to date within the parameters set by the Flag State in order to avoid compliance issues. Non-compliance can cause significant operational delays, through in-depth inspections, or in some cases, complete shutdown, fines or other penalties.


3.5.1 International Ship Security Certificate (ISSC)

The International Ship Security Certificate (ISSC) is the main certificate relative to ISPS. This is the primary evidence of compliance with ISPS. It is also an audit trail of the inspections the MODU has conducted during the life span of its ISSC. There is, generally, only one version of this document, but Transocean MODUs may see it in several formats, depending on the Flag State. A sample document is shown in Figure 3.1 and 3.2 below.

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Figure 3.2, International Ship Security Certificate (ISSC) – Page 2 - Example

However, there are other reasons for additional intermediate verifications such as if there has been reason to question the rigs compliance with established requirements or detentions etc.

UNIT 101102
19643
UNIT Compliance Plan
196174
Certificate No.
TRIAUS43862119

ENDORSEMENT FOR INTERMEDIATE VERIFICATION

This is a PROFORMA form for intermediate verification required by section 10.1.1 of part A of the ISPS Code and this was found to comply with the relevant provisions of chapter 22-2 of the International Maritime A of the ISPS Code.

Intermediate Verification	Signed	[Signature]
	Place	CHINA [illegible] [illegible]
	Date	2010.07.07


ENDORSEMENT FOR ADDITIONAL VERIFICATIONS

Additional Verification	Signed	
	Place	
	Date	
	Signed	
	Place	
	Date	
	Signed	
	Place	
	Date	

Second page is for signature of inspectors conducting intermediate verification of Transocean MODUs. Most of the Flag States Transocean uses require one intermediate verification.

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3.5.2 Interim International Ship Security Certificate (ISSC)

An Interim ISSC may be issued to a new MODU, or re-entry into service, or transferring from company to company, and on change over of Flag. It may only be issued by the Administration (or RSO, on behalf of the Administration) and is valid for 6 months, and may not be extended. An example is shown in Figure 3.3.

Figure 3.3, Interim ISSC – Example

INTERIM INTERNATIONAL SHIP SECURITY CERTIFICATE

(official seal)
(State)

Certificate No. _____

Issued under the provisions of the

INTERNATIONAL CODE FOR THE SECURITY OF SHIPS AND OF PORT FACILITIES
(ISPS CODE)

Under the authority of the Government of _____
(name of State)

by _____
(persons or organization authorized)

Name of ship : _____

Distinctive number or letters : _____

Port of registry : _____

Type of ship : _____

Gross tonnage : _____

IMO Number : _____

Name and address of company : _____

Is this a subsequent, consecutive interim certificate? Yes/ No *

If Yes, date of issue of initial interim certificate: _____

THIS IS TO CERTIFY THAT the requirements of section A/19.4.2 of the ISPS Code have been complied with.

This Certificate is issued pursuant to section A/19.4 of the ISPS Code.

This Certificate is valid until _____

Issued at _____
(place of issue of the certificate)

Date of issue _____

*(signature of the duly authorized official
issuing the Certificate)*

(Seal or stamp of issuing authority, as appropriate)

* Delete as appropriate


The interim ISSC is used for many reasons, but for the most part in the case of Transocean it would be used if the security plan was in the approval process or Transocean had just acquired or taken operation of the MODU.

Also, when the MODU is flagged with a state that is not a contracting government. The MODU must meet all of the verification requirements prior to being issued the interim ISSC and the interim document will not be valid for more than 6 months.

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3.5.3 Continuous Synopsis Record (CSR)


The Continuous Synopsis Record is another certificate issued to the MODU by the administration. It is a summary of the flag registry and ownership of the MODU. The CSR should not need to change unless there is a change to the MODU ownership or Flag State of the MODU. It is vital that this certificate be kept current. Any discrepancies will cause significant problems with entering another Flag State's waters.

The certification process should follow the schedule shown as follows:

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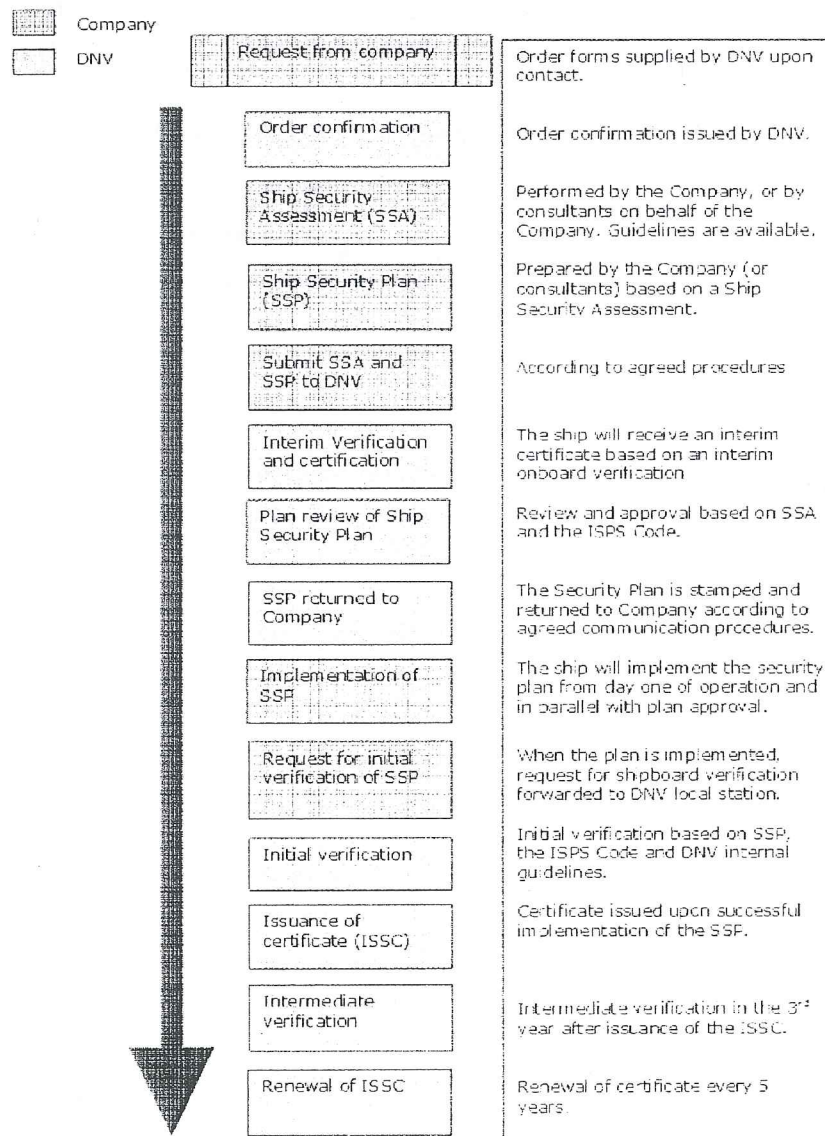
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Figure 3.4, Certification Process



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3.5.4 Shipboard Audit/Verification Application

If the certificate is due for Flag State or RSO review according to the contracting government's regulations, the DNV request form, shown in this subsection (Figure 3.5) is to be used by the Rig Manager to request the inspection or review.

Figure 3.5, DNV Request for Shipboard Audit / Verification Application

DET NORSKE VERITAS
ISM CODE / ISPS CODE / ISO CERTIFICATION / SEP
CLASSIFICATION
Shipboard Audit / Verification Application

Ship Name:		Class Society:	
Port of Registry:		Company Name:	
Company Address:		Fax No.:	
Tel. No.:		Tel. No.:	

Audit Request	Initial	Initial	Annual	Intermediate	Renewal	Additional	Reason if Additional:
ISM/ISPS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Change of: <input type="checkbox"/> DCC holder <input type="checkbox"/> Flag <input type="checkbox"/> Director
ISO 9001	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> As Recommended by: <input type="checkbox"/> Other
ISO 14001	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Date of audit/ETA/ETD: _____ Ship's Expected Audit Location: _____
 Next Port-of-Call (1st): _____ Next Port-of-Call (2nd): _____
 Date(s): _____ Date(s): _____

For vessels previously neither classed nor certified by DNV:

Company DCC: issued by (IMO or RSO) on behalf of (authorities) _____ Review date: _____ interim ☐ Short or Full Term: ☐

Ship's MLC: issued by (IMO or RSO) on behalf of (authorities) _____ Review date: _____

Ship's ISCC: issued by (RSO or RSO) on behalf of (authorities) _____ Review date: _____

Type of ship (reference also to copy of valid DCC as found onboard):

<input type="checkbox"/> Passenger Ship	<input type="checkbox"/> Bulk Carrier	<input type="checkbox"/> Gas Carrier	<input type="checkbox"/>
<input type="checkbox"/> Passenger High-Speed Craft	<input type="checkbox"/> Oil Tanker	<input type="checkbox"/> Mobile Offshore Support Unit (MOSU)	<input type="checkbox"/>
<input type="checkbox"/> Cargo Ship, Specialized	<input type="checkbox"/> Commercial Tanker	<input type="checkbox"/> Other Cargo Ship	<input type="checkbox"/>

Enclosed with this application:

Latest Class and statutory list showing status of certificates, surveys, and unresolved ongoing technical deficiencies (mandatory for non-DNV-Class vessels) ☐

Agent's details:

Name: _____

Address: _____

Tel (day): _____ Tel (after hours): _____ Fax: _____

Person Point of Contact: _____

Signature: _____ Date: _____


Submitted to: DNV (signature) _____

A DNV document which Transocean uses to request an ISM / ISPS audit or verification.

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3.6 MAINTAINING COMPLIANCE

3.6.1 Compliance and Validity

The aim of compliance is to meet the standards set by the Contracting Government, in all aspects of the MODU's security program. The key is continual diligence in maintaining all the required regulatory documentation. Problems occur when these responsibilities are not met, which emphasizes the importance of ensuring that MODU security documentation is current and valid.

3.6.2 Verification

Verification of MODUs will be carried out by the administration or a Recognized Security Organization such as DNV. MODUs will be subject to the following verifications:

- Initial - required before the MODU is put into service or being issued for the first time. This verification includes a complete verification of its security system and any associated security equipment covered in the ISPS Code and SSP.
- Intermediate - verification will be scheduled between the second and third anniversary date of the ISSC issue
- Renewal – within six months prior to ISSC expiration (which will normally be five years from issue)

Any additional verification will be determined by the Administration.

3.7 AUDITS – INTERNAL AND EXTERNAL

Audits and inspections are the primary tools used in verifying security procedures and ensuring compliance with ISPS, or applicable Flag State regulations. Audits are broken into two types, those done internally and those conducted externally by entities like the Contracting Government or the appointed RSO.

3.7.1 Internal Audits


Internal audits should be completed in accordance with established company policy and conducted by internal Transocean personnel. Reference Performance Monitoring Audit and Assessment Procedures, HQS-CMS-PR-02.

Internal auditors are independent of the MODU being audited and not assigned to the MODU as a member of the crew. Internal audits measure the policies and

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procedures against the applicable regulations to ensure the MODU meet their security regulatory requirements. If necessary, findings or deficiencies are corrected prior to any upcoming external audit.

3.7.2 External Audits

External audits are conducted by the Flag State or appointed RSO e.g., DNV. The audit will consist of informal interviews, examinations, and observations. During this process, an assessment of the MODU's compliance with the requirements of the ISPS Code will be carried out. When found compliant, the relevant certificate will be issued. Findings related to the focus areas will be presented at the end of the audit in a closing meeting and included in the audit report.

3.7.3 Internal Review

The SSP will be reviewed by the SSO to ensure its continued effectiveness. Any modifications will be forwarded to the Business Unit CSO for review, submittal and approval.

Reviews will be conducted:

- Annually
- After lessons learned from
 - Audits
 - Drills
 - Exercises, and
 - Security Incidents

3.8 SUSPENSION AND WITHDRAWAL


If an auditor identifies deficiencies, through objective evidence or non-compliance with the approved SSP, they must communicate it to the Company, the Administration and the organization that approved the SSP. In such cases an ISSC shall not be issued until the MODU can show that the security system, and associated security and surveillance equipment is satisfactory in all respects and that the MODU complies with regulatory requirements of SOLAS, ISPS Code, and the applicable Flag State.

Additional MODU verification audits may be carried out at any time by the RSO on behalf of the Administration. A MODU detained on security grounds shall be required to undergo an additional audit by the RSO. However, the nature and extent of the non-compliance will determine the extent of the re-verification of the SSP.

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Flag or coastal authority inspection teams are not allowed access to the SSP. However, they will be provided with guidelines that will allow them to determine to the extent possible that there is an effective safety and security management system in place. Their guidelines will also serve to determine whether there are "clear grounds" to believe that there may be non-compliance issues. If such circumstances should arise, the Administration will be notified and the MODU's RSO dispatched to review the situation.

3.8.1 Non-Compliance Information Received Direct From Flag State as Per Legislation and Regulations

If a MODU is found to be non-compliant with the ISM or ISPS Code, the Flag State has the authority to invalidate the MODU'S certificate and all other associated certificates. As a result of that action, the Flag State will also remove the MODU from its registry thus preventing it from trade, impose a penalty up to \$50,000 per MODU, and raise a lien against the MODU based upon imposed penalty. In addition, the Port State Control Authority (coastal state) would detain the MODU until re-certification can be obtained.

3.9 SHIP SECURITY PLAN – MANAGEMENT

3.9.1 Company Responsibility to Flag State

The Company shall ensure that the Ship Security Plan contains a clear statement emphasizing the master's authority. The Company shall establish in the Ship Security Plan that the Master has the overriding authority and responsibility to make decisions with respect to the safety and security of the MODU and to request the assistance of the Company, or of any Contracting Government, as necessary.

The Company shall ensure that the Company Security Officer, the Master and the Ship Security Officer are given the necessary support to fulfill their duties and responsibilities in accordance with SOLAS chapter XI-2, Part A of the ISPS Code and Flag State regulations.


3.9.2 Requirement for Entering Port

A MODU entering a port or transiting the territorial waters of a Flag State should be contacted for discussion between the Business Unit CSO and the MODU prior to entry. During transit the Master/OIM and SSO should review the SSP for guidance on entering the port. Section 18 and 19 of the SSP will cover the required contacts, reports and checklists needed prior to a port entry or territorial waters transit.

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3.9.3 Vulnerability

Vulnerability is defined as any weaknesses or gaps in physical security, security procedures or personnel that could be exploited. It is vital that the vulnerabilities be assessed periodically in order to maintain the security apparatus. The position of the MODU should also be taken into account when factoring the prevalence of threats. Although fewer threats are faced when offshore the vulnerabilities must be considered wherever the MODU is located and especially when in transit or when entering port.

3.9.4 Ship Security Assessment

The Ship Security Assessment is an essential and integral part of the process of developing and updating the Ship Security Plan.

The Business Unit CSO shall ensure that the ship security assessment is carried out by persons with appropriate skills to evaluate the security of a MODU, in accordance with part A of the ISPS Code, taking into account the guidance given in part B of the ISPS Code.

A recognized security organization may carry out the ship security assessment of a specific MODU so long as they meet the requirements laid down in the ISPS and by Flag States. Transocean currently uses a number of recognized security organizations.

The ship security assessment must include an on-scene security survey and, at least, the following elements:


- Identification of existing security measures, procedures and operations
- Identification and evaluation of key ship board operations that it is important to protect
- Identification of possible threats to the key ship board operations and the likelihood of their occurrence, in order to establish and prioritize security measures
- Identification of weaknesses, including human factors in the infrastructure, policies and procedures.

The ship security assessment shall be documented, reviewed, accepted and retained by the Company.

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3.9.5 Ship Security Plan

The SSP contains information on procedures, compliance, documentation, review and liaison with the CSO, SSO, Flag and Port State authorities. The SSO is the point of contact for all security aspects on the MODU and should have regular discussions with Rig Management to ensure the security management system is compliant. The SSO contact for security matters regarding the MODU is the Business Unit CSO. The contents of the SSP are classified as security sensitive information and will, therefore, not be dealt with in this guide; however the main elements of the SSP are;

- The organizational structure for security for the MODU including contact details
- The MODU's relationships with the Company, port facilities, relevant flag states and coastal authorities with security responsibility
- Communications procedures both internal and external
- Security measures for security level 1, both operational and physical
- Additional security measures that allow the MODU to progress to security level 2 without delay and if necessary to security level 3
- Procedures for regular review, or audit and for its amendment in response to experience or changing circumstances
- Reporting procedures to the appropriate Flag State authorities
- Procedures for responding to security incidents or breaches of security
- Procedures for testing, calibration and maintenance of security equipment

3.10 ALERT AND MONITORING SYSTEMS


3.10.1 Ship Security Alert System (SSAS)

The Ship Security Alert System is intended for the purpose of alerting outside authorities that the security of the MODU has been breached or there is a substantial threat of its security being breached. When testing is required, the MODUs will be called by the Tracking Service Provider (TSP). The specific workings and parameters of the SSAS system are classified as security sensitive information. If further information is required, contact the SSO, Business Unit CSO, Corporate CSO or the TSP.

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3.10.2 Long Range Identification and Tracking (LRIT)

LRIT will only normally be required when in transit. During normal stationary operations or when the MODU is in port LRIT information will not be required. Specific information is broadcast to selected personnel or authorities. The only action on the part of the MODU will be to keep the TSP or monitoring entity aware of any planned movements so the system can be configured to provide the correct information.

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<div>ANNEX</div> <div>REFERENCE MATERIALS AND PUBLICATIONS</div>			

The reference material and publications listed below were used in the development of the handbook. Further, specific, information regarding ISM / ISPS can be found in the reference documentation.


International Safety Management Code	(2002)
International Ship and Port Facility Security Code	(2003)
Safety of Life at Sea Regulations	(2006 Amendments)
Maritime Transportation Security Act	(2003)
International Maritime Organization Circulars	
Specific Flag Regulations/Interpretations	
Vessel Security Officer Cornell Maritime Press	(2006)

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ANNEX INTERNATIONAL MARITIME ORGANIZATION CIRCULARS			


MSC-MEPC.7 Circ 6	Guidance on the qualifications, training and experience necessary for undertaking the role of the Designated Person under the provisions of the International Safety Management Code
MSC-MEPC.7/Circ 5	Guidelines for the operational implementation of the International Safety Management (ISM) Code by companies
MSC/Circ.1154	Guidelines on Training and Certification for Company Security Officers
MSC/Circ.1132	Guidance relating to the Implementation of SOLAS Chapter XI-2 and the ISPS Code
MSC/Circ.1131	Interim Guidance on voluntary self-assessment by SOLAS Contracting Governments and by port facilities
MSC/Circ.1130	Guidance to Masters, Companies and duly authorized officers on the requirements relating to the submission of security-related information prior to the entry of a ship into port
MSC/Circ.1111	Guidance relating to the implementation of SOLAS Chapter XI-2 and the ISPS Code (English)
MSC/Circ.1109/Rev.1	False security alerts and distress/security double alerts

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ANNEX DEFINITIONS			

Unless otherwise specified, the following definitions apply to this guide:

Administration - the appointed Government entity of the State whose flag the MODU is entitled to fly.

Automatic Identification System (AIS) - system used by ships and Vessel Traffic Services (VTS) principally for identification and locating vessels. AIS provides a means for ships to electronically exchange ship data including: identification, position, course, and speed, with other nearby ships and VTS stations.

Breach of Security - an incident that has not resulted in a transportation security incident, in which security measures have been circumvented, eluded, or violated.

Company - the Owner of the MODU or any other organization or person who has assumed the responsibility for operation of the rig from the rig owner and who on assuming such responsibility has agreed to take over all the duties and responsibilities imposed by the ISM or ISPS Code.

Company Management System (CMS) - for the purposes of ISM, the entire Transocean Management System including all manuals, policies and procedures and handbooks which are used to ensure that Transocean can fulfill all tasks required to achieve company expectations and objectives.

Company Security Officer (CSO) - the person designated by the Company for ensuring that a ship security assessment is carried out; that a ship security plan is developed, submitted for approval, and thereafter implemented and maintained and for liaison with port facility security officers and the ship security officer.

Continuous Synopsis Record (CSR) - is intended to provide an on-board record of the history of the ship with respect to the information recorded therein,

Contracting Government - any government of a nation that is a signatory to SOLAS.


Convention - International Convention for the Safety of Life at Sea, 1974 as amended.

Dangerous Substances Or Devices - any material, substance, or item that reasonably has the potential to cause a transportation security incident.

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Declaration of Security (DOS) - written agreement executed between the responsible Vessel and Facility Security Officer, or between Vessel Security Officers in the case of a vessel-to-vessel activity, that provides a means for ensuring that all shared security concerns are properly addressed and security will remain in place throughout the time a vessel is moored to the facility or for the duration of the vessel-to-vessel activity, respectively.

Designated Person (DP) - a person appointed by the company who is based onshore. Their basic function is that of a go-between for the MODU and the company. The DP will have access to senior management to assist the MODUs in various situations. The DP will be the main point of contact for the Rigs in resolving issues for the Master/OIM which cannot otherwise be resolved. All MODU workers should know the DP by name and be aware of what his role is within the company.

Document of Compliance (DOC) - a document issued to a Company which complies with the requirements of the ISM Code.

Drill - a training event that tests at least one component of the rig, vessel, or facility security plan and is used to maintain a high level of security readiness.

Exercise - a comprehensive training event that involves several of the functional elements of the SMS, vessel, or facility security plan and tests communications, coordination, resource availability, and response.

International Maritime Organization (IMO) - a specialized agency of the United Nations with 168 Member States and three Associate Members. The IMO promotes cooperation among governments and the shipping industry to improve maritime safety and to prevent marine pollution.

International Safety Management (ISM) Code - International Management Code for the Safe Operation of Ships and for Pollution Prevention as adopted by the Organization by resolution A.741 (18), as may be amended by the Organization.


Interim Document of Compliance (IDOC) - may be issued to facilitate initial implementation of the ISM code when a company is newly established or new ship types are to be added to an existing Document of Compliance. Issued for a period of not exceeding 12 months by the administration

International Safety Management Certificate (ISSC) - the main certificate relative to ISPS and primary evidence that a MODU is compliant with the ISPS Code.

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ISPS Code - International Ship and Port Facility Security Code, as incorporated into SOLAS.

Long Range Identification and Tracking (LRIT) - an international system for the Long range Identification and Tracking of ships. The system will automatically report the ship's position to their Flag Administration at least four times a day. Other contracting governments may request information about vessels in which they have a legitimate interest under the regulation.

Major Non Conformity - an identifiable deviation which poses a serious threat to personnel or ship safety or a serious risk to the environment and requires immediate corrective action; in addition the lack of effective and systematic implementation of a requirement of the ISM or ISPS Code, is also considered as a major non conformity.

Maritime Safety Committee (MSC) - International Maritime Organization's senior technical body on safety-related matters. It is aided in its work by a number of Sub-Committees.

Mobile Offshore Drilling Unit (MODU) - defined by SOLAS as a mechanically propelled vessel, not on location and capable of engaging in drilling operations for the exploration or for exploitation of resources beneath the seabed, such as liquid or gaseous hydro carbons, sulphur or salt.

Memorandum of Understanding (MOU) - a document describing a bilateral or multilateral agreement between parties. It expresses a convergence of will between the parties, indicating an intended common line of action.

Non Conformity - an observed situation where objective evidence indicates the non fulfillment of a specified requirement.

Non-compliance - non fulfillment of a specified requirement of the ISM / ISPS codes.

Objective Evidence - quantitative or qualitative information, records or statements of fact pertaining to safety or to the existence and implementation of a ISPS or SMS element, which is based on observation, measurement or test and which can be verified.


Observation - a statement of fact made during a Safety Management Audit and substantiated by objective evidence.

Outer Continental Shelf (OCS) Facility - any artificial island, installation, or other complex of one or more structures permanently or temporarily attached to the subsoil or seabed of the OCS, erected for the purpose of exploring for, developing or producing oil, natural gas or mineral resources. This definition includes all mobile offshore drilling units (MODUs) not

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covered under part 104 MTSA, when attached to the subsoil or seabed of offshore locations, but does not include deepwater ports, as defined by 33 U.S.C. 1502, or pipelines.

Owner or Operator - any person or entity that owns, or maintains operational control over, any facility, vessel, or OCS facility subject to this subchapter. This includes a towing vessel that has operational control of an unmanned vessel when the unmanned vessel is attached to the towing vessel and a facility that has operational control of an unmanned vessel when the unmanned vessel is not attached to a towing vessel and is moored to the facility; attachment begins with the securing of the first mooring line and ends with the casting-off of the last mooring line.

Port Facility Security Officer - the person designated as responsible for the development, implementation, revision and maintenance of the port facility security plan and for liaison with the ship security officers and company security officers.

Port Facility Security Plan - a plan developed to ensure the application of measures designed to protect the port facility and ships, persons, cargo, cargo transport units and ship's stores within the port facility from the risks of a security incident.

Port State - refers to that authority under which a country exercises regulatory control over the commercial vessel which is registered under another country's flag. This authority only exists while those vessels are operating within that country's territorial waters. United States territorial waters extend out to 12 miles (22.2 km).

Recognized Organization (RO) - The RO for Transocean is DNV and they act on behalf of the Flag State or at the request of the company. These actions will be in the context of surveys and inspections for the most part and in their capacity as the entity acting under a specific mandate as it relates to safety of the MODU.

Recognized Security Organization (RSO) - an organization with appropriate expertise in security matters and with appropriate knowledge of ship and port operations authorized to carry out an assessment, or verification, or an approval or a certification activity, required by SOLAS or by part A of the ISPS Code.


Regulation - a regulation of the Convention.

Regulatory - The Regulatory relationship is formed by the ISM or ISPS code and Flag State regulations if any. For this guide our primary focus will be on the MODU's interaction with outside actors for the purpose of inspections and audits.

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Security Restricted Areas - the infrastructures or locations identified in an area, vessel, or facility security assessment or by the operator that require limited access and a higher degree of security protection. The entire facility may be designated the restricted area, as long as the entire facility is provided the appropriate level of security.

Safety Management Audit - means a systematic and independent examination to determine whether the SMS activities and related results comply with planned arrangements and whether these arrangements are implemented effectively and are suitable to achieve objectives.

Safety Management Certificate (SMC) - a document issued to a rig which signifies that the Company and its rig management operate in accordance with the approved SMS.

Safety Management System (SMS) - a structured and documented system enabling Company personnel to effectively implement the Company Safety and Environmental Protection Policy.

Screening - a reasonable examination of persons, cargo, vehicles, or baggage for the protection of the vessel, its passengers and crew. The purpose of the screening is to secure the vital government interest of protecting vessels, harbors, and waterfront facilities from destruction, loss, or injury from sabotage or other causes of similar nature. Such screening is intended to ensure that dangerous substances and devices, or other items that pose a real danger of violence or a threat to security are not present.

Security Audit - an evaluation of a security assessment or security plan performed by an owner or operator, the owner or operator's designee, or an approved third-party, intended to identify deficiencies, non-conformities and/or inadequacies that would render the assessment or plan insufficient.

Security Incident - any suspicious act or circumstance threatening the security of the ship, including a mobile offshore drilling unit and a high-speed craft, or of a port facility or of any ship/port interface or any ship-to-ship activity.

Security Level 1 - the level for which minimum appropriate protective security measures shall be maintained at all times.


Security Level 2 - the level for which appropriate additional protective security measures shall be maintained for a period of time as a result of heightened risk of a security incident.

Security Level 3 - the level for which further specific protective security measures shall be maintained for a limited period of time when a security incident is probable or imminent, although it may not be possible to identify the specific target.

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Security Sweep - a walkthrough to visually inspect unrestricted areas to identify unattended packages, briefcases, or luggage and determine that all restricted areas are secure.

Security System - a device or multiple devices designed, installed and operated to monitor, detect, observe or communicate about activity that may pose a security threat in a location or locations on a vessel or facility.

Ship - when used in the ISM/ISPS Code, includes mobile offshore drilling units and high-speed craft as defined in regulation XI-2/1.

Ship/Port Interface - the interactions which occur when a ship or MODU is directly and immediately affected by actions involving the movement of people, goods or the provisions of port services to or from the ship or MODU.

Ship Security Alert System (SSAS) - A system when activated will transmit a ship-to-shore security alert to a competent authority, identifying the ship and location. The alarm is silent and will be located at two different locations on board the vessel.

Ship Security Assessment (SSA) - A process conducted to assess and identify the possible threats to key MODU operations, existing security operations and weaknesses in the infrastructure, policies and procedures

Ship Security Officer (SSO) - the person on board the ship, accountable to the master, designated by the Company as responsible for the security of the ship, including implementation and maintenance of the ship security plan and for liaison with the company security officer and port facility security officers.

Ship Security Plan (SSP) - a plan developed to ensure the application of measures on board the ship designed to protect persons on board, cargo, cargo transport units, ship's stores or the ship from the risks of a security incident.

Ship-to-Ship Activity - any activity not related to a port facility that involves the transfer of goods or persons from one ship or Rig to another.


SOLAS 74 - International Convention for the Safety of Life at Sea Convention, 1974, as amended. The most important treaty protecting the safety of merchant ships. The 1974 version simplified the process for amending the treaty.

Standards of Training Certification and Watchkeeping (STCW) - sets qualification standards for masters, officers and watch personnel on seagoing merchant ships. **STCW** was adopted in 1978 by conference at the International Maritime Organization (IMO) in

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London, and entered into force in 1984. The Convention was significantly amended in 1995.

Subject Matter Expert (SME) - a person who is an expert in a particular area or subject.

Survey - an on-scene examination and evaluation of the physical characteristics of a MODU or facility, and its security systems, processes, procedures, and personnel.

Tracking Service Provider (TSP) - a contracted company which provides a means for ships to automatically report their position to their Flag Administration at least four times a day.


Unaccompanied Baggage - any baggage, including personal effects that are not being brought on board on behalf of a person who is boarding the vessel.

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ANNEX SPECIFIC COASTAL REGULATIONS INTERPRETATIONS			

Flag State	Audit Authorization	Issuance of SMC/DOC	RSP / VSP / SSP Approval	Comments
Algeria	Yes	Interim and full term SMC and DOC are issued by DNV.	Flag State Approval	
Antigua & Barbuda	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Aruba	Yes	Interim and short term SMC and DOC by DNV. Full term certificates by Flag.	Contact flag for clarification	
Australia	No	No		
Bahamas	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Bahrain	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Bangladesh	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Barbados	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Belgium	Yes	Interim and short term SMC and DOC by DNV. Full term certificates by Flag.	VSP,SSP (Flag State) RSP Handled by Govt	
Belize	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Bermuda	Case by case	As pr case by case authorization.	Flag State handles all approvals	Company to request Flag to authorize DNV for each audit.
Brazil	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Cambodia	No	No		
Canada	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Cayman Islands	No	No		
Chile	Case by case	As pr case by case authorization.	Contact flag for clarification	Company to request Flag to authorize DNV for each ship/company.
China	No	No		
Comoros Islands	Case by case	As pr case by case authorization.	Contact flag for clarification	Company to request Flag to authorize DNV for each ship/company.
Croatia	Case by case	As pr case by case authorization.	Contact flag for clarification	Company to request Flag to authorize DNV for each ship/company.

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ANNEX SPECIFIC COASTAL REGULATIONS INTERPRETATIONS			

Flag State	Audit Authorization	Issuance of SMC/DOC	RSP / VSP / SSP Approval	Comments
Cyprus	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	Authorization to be requested by company for first (interim) certification of company and each ship. Full authorization (audit and certify) for ships and companies already certified by DNV.
Denmark	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	Authorization is not covering passenger ships. These are handled by the Flag.
Dominica, Commonwealth of	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Egypt	Yes	Interim and short term SMC and DOC by DNV. Full term certificates by Flag.	Has designated a company RSO	
Estonia	Case by case	As pr case by case authorization.	Contact flag for clarification	Company to request Flag to authorize DNV for each audit.
Ethiopia	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Faroe Islands	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Fiji	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Finland	Case by case	Interim and short term SMC and DOC by DNV. Full term certificates by Flag.	Flag State handles all approvals	Authorization required for company and covers all ships operated by this company. Company to request Flag to authorize DNV. Authorization is not covering passenger ships.

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<i>Flag State</i>	<i>Audit Authorization</i>	<i>Issuance of SMC/DOC</i>	<i>RSP / VSP / SSP Approval</i>	<i>Comments</i>
France	Case by case	As pr case by case authorization.	Contact flag for clarification	Company to request Flag to authorize DNV for each audit.
Gambia	Case by case	As pr case by case authorization.	Contact flag for clarification	Company to request Flag to authorize DNV for each ship/company.
Georgia	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Germany	Yes	Interim and short term SMC and DOC by DNV. Full term certificates by Flag.	Contact flag for clarification	
Ghana	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Gibraltar	Case by case	Interim and short term SMC by DNV. Full term SMC by Flag.	Contact flag for clarification	Company to request Flag to authorize DNV for each ship. No authorization will be given for DOC.
Greece	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Honduras	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Hong Kong	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	Authorization is not covering passenger ships. DNV needs to obtain a written confirmation before issuing a DOC to a Company which is new to the Flag.
Iceland	Yes	Interim and full term SMC and DOC are issued by DNV.	Flag State handles all approvals	Company to request Flag to authorize DNV for passenger ships.
India	No	No		
Indonesia	No	No		
Iran	Yes	Interim and full term SMC are issued by DNV.	Contact flag for clarification	DOCs will be issued by Flag upon audit report from DNV.
Ireland	Yes	Interim and full term SMC and DOC are issued by DNV.	Has a Company RSO	

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<i>Flag State</i>	<i>Audit Authorization</i>	<i>Issuance of SMC/DOC</i>	<i>RSP / VSP / SSP Approval</i>	<i>Comments</i>
Italy	No	No		
Jamaica	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Jordan	Case by case	As pr case by case authorization.	Contact flag for clarification	Company to request Flag to authorize DNV for each ship/company.
Kuwait	Case by case	Interim and full term SMC and DOC are issued by DNV upon received authorization.	Contact flag for clarification	Case by case authorization required for first (interim/initial) audit and certificate, and for renewal audit.
Latvia	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Liberia	Yes	Interim and full term SMC and DOC are issued by DNV.	Flag State handles all approvals	
Libya	Case by case	As pr case by case authorization.	Contact flag for clarification	Company to request Flag to authorize DNV for each ship/company.
Lithuania	Case by case	As pr case by case authorization.	SSP (Flag State) RSP,VSP (UK)	Company to request Flag to authorize DNV for each ship/company.
Luxembourg	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Madeira	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Malaysia	Case by case	When authorized, interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	Authorization required for first certification of each vessel and company. Company to request Flag to authorize DNV for first certification.
Malta	Case by case	When authorized, interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	Authorization required for first certification of each vessel and company. Company to request Flag to authorize DNV for first certification.

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ANNEX
SPECIFIC COASTAL REGULATIONS INTERPRETATIONS

Flag State	Audit Authorization	Issuance of SMC/DOC	RSP / VSP / SSP Approval	Comments
Marshall Islands	Yes	Interim and full term SMC and DOC are issued by DNV.	Company RSO	
Mauritius	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Mexico	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Morocco	Case by case	As pr case by case authorization.	Contact flag for clarification	Company to request Flag to authorize DNV for each ship/company.
Myanmar (ex. Burma)	No	No		
Namibia	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Netherlands	Yes	Interim and full term SMC and DOC are issued by DNV.	RSP (Govt) VSP, SSP (RSO)	
Netherlands Antilles	Yes	Interim and short term SMC and DOC by DNV. Full term by Flag.	Contact flag for clarification	
New Zealand	No	No		
Nigeria	Yes	Interim and short term SMC and DOC by DNV. Full term by Flag.	Contact flag for clarification	
Norway	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	NIS: Full authorization NOR: Authorization for vessels classed by DNV. Not authorized for passenger vessels.
Panama	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Papua New Guinea	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Philippines	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Portugal	No	No		
Qatar	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Romania	No	No		
Russia	Case by case	As pr. case by case authorization.	Contact flag for clarification	Company to request Flag to authorize DNV for each ship/company.

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Flag State	Audit Authorization	Issuance of SMC/DOC	RSP / VSP / SSP Approval	Comments
Samoa	Case by case	As pr. case by case authorization.	Contact flag for clarification	Company to request Flag to authorize DNV for each ship/company.
Saudi Arabia	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Seychelles	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Singapore	Yes	Interim and full term SMC and DOC are issued by DNV.	Flag State handles all approvals	
Slovakia	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for further clarification	
Sri Lanka	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for further clarification	
St.Vincent and the Grenadines	Yes	Interim and short term SMC by DNV. Full term SMC by Flag. Full term DOC issued by DNV.	Contact flag for clarification	
Switzerland	Case by case	When authorized for the company, interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	Authorization required for a company and will be valid for all company ships. Once authorized, no further authorization is required.
Sweden	No	No		
Thailand	Case by case	As pr. authorization letter.	Contact flag for clarification	Company to request Flag to authorize DNV for each ship/company.
Tonga	Yes	Interim and full term SMC and DOC are issued by DNV.	RSP (Govt) VSP, SSP (Flag State)	
Trinidad and Tobago	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Tunisia	Case by case	As pr. authorization letter.	Contact flag for clarification	Company to request Flag to authorize DNV for each ship/company.
Turkey	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Tuvalu	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
Ukraine	No	No		

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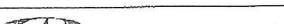
<i>Flag State</i>	<i>Audit Authorization</i>	<i>Issuance of SMC/DOC</i>	<i>RSP / VSP / SSP Approval</i>	<i>Comments</i>
United Arab Emirates	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	
United Kingdom	Yes	Issued by Flag State	Flag State handles all approvals	
USA	Yes	Interim and full term SMC and DOC are issued by DNV.	Flag State handles all approvals	
Vanuatu	Yes	Interim and full term SMC and DOC are issued by DNV.	Company RSO	
Venezuela	No	No		
Vietnam	Case by case	When authorized, interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	Authorization required for first certification of each vessel and company. Company to request Flag to authorize DNV for first certification.
Yemen	Yes	Interim and full term SMC and DOC are issued by DNV.	Contact flag for clarification	

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APPROVALS

Approved by:

Executive Signature

Adrian P. Rose

Name

Vice President, QHSE

Position

Approved by:

Department Head Signature

Jimmy Moore

Name

Director, QHSE

Position

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