

London Branch

Tank Inspections : Safety v Results

Members of the London Branch had raised concerns regarding the OCIMF tanker questionnaire requirement for annual tank inspections of all cargo tanks by ships' crew. Operational and safety implications were the main concerns, with questions over the effectiveness and expertise of ship's staff to carry out these inspections. The Branch committee agreed that a debate on this issue would be appropriate for a branch technical meeting. Accordingly, another large international audience, including several delegates attending the Maritime Safety Committee at IMO and some NI members from overseas branches, assembled on board HQS Wellington on 1st June.

Chaired by Philip Wake, Chief Executive of the Nautical Institute, the panel of speakers comprised Kuba Szymanski, General Manager, MOL Tankships (Europe), Mike Bowen, UK P&I Club, Chris Thornton from Lloyds Register, and Phil Davies, Director, OCIMF

Speaking at the end of the debate, Phil Davies announced that, from the 2nd June 2009, the requirement for annual inspection of cargo tanks by ship's staff provision in SIRE questionnaire is to be replaced by *"In the case of oil and chemical tankers, inspections of cargo tanks should be made at intervals not exceeding 2.5 years. Ballast tanks should be inspected annually. In the case of gas carriers, ballast tanks, void spaces, cofferdams, and hold spaces should be inspected annually."*

He outlined the reasons behind the original requirement for annual inspections by ship's staff, and explained that the specific interval was adopted by OCIMF in the absence of consistency and expectations from IMO and industry.

Regarding tank entry accidents, Phil noted that data collected on behalf of the Marine Accident Investigators International Forum (MAIIF) indicated that accidents in enclosed/confined spaces continued to be one of the most common causes of work-

related fatalities on board ships today. However, he observed that the procedures in place in the tanker sector were instrumental in the enhanced safety record of tanker personnel.

Earlier, Kuba Szymanski had advocated for a change in the cargo tank inspection procedure and demonstrated that a person of average height would have difficulty in seeing clearly into the corners of the courtroom of HQS Wellington, never mind tanks up to 22m high. He conducted an interactive presentation with the members of the audience, getting them to participate in populating a SWOT (Strengths, Weaknesses, Opportunities and Threats) diagram and using the (albeit limited) data, he showed that you could base a change on analysis of the data. Kuba reasoned that, using SWOT criteria and managing the risk, there was no reason that cargo tanks could not be inspected every 30 months at scheduled drydocking and that the structure of cargo tanks can be inspected from ballast tank spaces.

In 2008 the UK P&I Club issued a technical bulletin on enclosed space entry which recorded the heightened frequency of enclosed space incidents resulting in death of both crew members and visitors.

Mike Bowen addressed the concerns of the industry on these statistics, and asked why are we still sending people into tanks? It is a dangerous environment and he questioned the rationale for an annual survey.

Mike compared the requirements for subaqua training before a person is allowed to make a dive and asked what training do ship's crew have before they are asked to don a breathing apparatus and go into an alien environment?

Lloyds Register has a three pronged view of risk management in tank inspections: safety of life, cargo integrity, and the environment. Chris Thornton explained how to balance the safety need against the consequences and noted that inspections are not the same as a survey for class – they are subtly different. A close-up inspection, if deemed necessary, means inspection of items within the close visual range of the inspector (i.e within arms length). In a cargo tank the primary area of corrosion is the deckhead and upper levels, where you must be physically close to see any defects. He argued we should now be

progressing with entry into tanks for inspections and looking at other methods – using robots perhaps.

There followed a lively and sometimes heated debate with questions and observations from the audience. Training and guidelines provided a number of points – is there a training need for entry into enclosed spaces? In the tanker industry, the officers are very well trained, with a high retention rate in the oil majors fleets. With so many regulating bodies, it is hard to have poorly trained officers. However, officers are over-trained in some operations and not so well trained in others. Why do we need to train people to inspect tanks? Are we training them to carry out risk assessment on each occasion and not just falling into previous patterns? Training is not enough, continuous experience is preferable. i.e. ship's staff who only carry out an inspection once a year will not have the necessary experience compared with specialists. However, there is a danger that the pendulum will swing too far and leave us with ship's staff with no experience at all.

The chairman eventually called a halt to the debate and remarked it had been a very interesting evening with a good resolution between the participants. Entry into enclosed spaces is a dangerous procedure, but must be undertaken, and that training of people must be properly thought through, perhaps with specialists employed instead or working with ship's staff. The breaking news that the SIRE inspection questionnaire was being amended on the inspection intervals was to be welcomed.

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