Impact of a Draft URCP on BCs &OTs following MSC 96

The Shipbuilders' Association of Japan



Urgent Rule Change Proposal(URCP)

- IACS released draft URCP on 1st September 2016, to rectify non conformities (NC01,NC03,NC04) related to GBS verification.
- Industry review for 4 weeks

in September 2016 (9/1~9/30).

ASEF members reviewed the URCP

and send feedback about this issue to IACS.

• Submission to IMO for audit

mid - December 2016

• Entry into force on 1st July 2017



Daft URCPs- Non Conformity NC01&NC03

- •NC01 "Non-uniform ship heading distributions"
 - Increase in sea pressure and wave loads for load case of Head sea & Following sea by 5%

Impact on hull girder strength / Ultimate strength

- •NC03 "Fraction of time in heavy ballast condition" in North Atlantic for BC-B & BC-C with L < 200m"
 - 25% instead of 15%

Impact on fatigue requirement in ballast hold



Daft URCPs- Non Conformity NC04

NC04 "Time in corrosive environment"

- 10 years instead of 5years

for ballast/oil cargo tank



- 5 years instead of 2 years for void spaces

Large impact on Fatigue requirement

ASEF has deep concerns about the draft URCP concerning NC04.



Maintenance and Repair of coatings

1.Guidelines for Maintenance and Repair of Protective Coatings" of IMO recommend:

<u>Annual inspection of all ballast tanks and</u> minor coating restoration work to be carried out by the Crew (by utilizing PMA, etc.)

2.ESP regime requires:

Survey planning documents containing coating condition information to be prepared by Owner and <u>enhanced annual, intermediate and renewal surveys</u> to be carried out by the Class (RO)



Breakdown spot of coatings can duly be detected, maintained and repaired under present regime.



Useful period of protective coatings

A) Useful period assumed by CSR for BC &OT : 17 years





Results of IACS study

B) Useful life targeted by PSPC: 15 years No extra inspection & survey is needed since coatings do not break down just after elapse of target useful period of 15 years.

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Extreme presumption

Decreased Protected time 17 years →13 years(URCP)

For 12 years after elapse of protected time of 13 years, <u>neither inspection & survey</u>

nor maintenance & repair

of coatings



Such extreme presumption is against IMO/Class principles for safety and even suggests early renewal due to corrosion left untouched.



Safety factor in usual ships

(A) Main North Atlantic (N.A.) route

Wave load (Q = 10⁻²)on Northernmost N. A. route (CSR for BC & OT)

= 1.12 x Wave Load on Main N.A. route

Safety factor in fatigue life : Around 1.4 (=1.12³)

(B) World Wide route

Safety factor in fatigue life : <u>Around 2.8</u> (=2.0 x (A))



Present CSR for BC & OT provide usual ships with sufficient safety level.



Impact analysis (IACS TB of Draft URCP:NC04)



Large impact on deck longitudinal stiffeners



Impact analysis (IACS TB of Draft URCP:NC04)



Large impact on bottom longitudinal stiffeners



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Stress concentration factor

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Impact study (Draft URCP:NC04)

 Increased hull girder section moduli at deck and/or bottom of large BCs and OTs



abt. +7mm for deck plates of Cape size BC abt. +3.5~8mm for BTM plates of VLCC



Impact study (Draft URCP:NC04)

Deck plate thickness of Cape size BC : max 49mm



Challenges and difficulties of One-side Submerged Arc Welding





Increased risk (Draft URCP:NC04)

Heavy thickness for Cape BC and VLCC

Elongated butt & seam weld lines due to weight/lifting capacity restriction

More defects embedded in the weld lines which are more difficult to detect by NDT

Fatigue cracking and Brittle fracture risk



Conclusion

Draft URCP:NC04 brings adverse side effects on the shipping and environment.

Increased risk of structural failure
Substantial amount of extra steel
Substantial amount of extra FOC
Extra CO2 emission

In conclusion, ASEF ask IACS to reconsider and withdraw the Draft URCP:NC04



Thank you for your attention.

