



**MEMORANDUM OF AGREEMENT  
BETWEEN THE  
BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT – U.S. DEPARTMENT OF THE  
INTERIOR  
AND THE  
U.S. COAST GUARD – U.S. DEPARTMENT OF HOMELAND SECURITY**

BSEE/USCG MOA: **OCS-04**

Effective Date: 28 January 2016

**SUBJECT: FLOATING OCS FACILITIES**

**A. PURPOSE**

The parties to this Memorandum of Agreement (MOA) are the United States Coast Guard (USCG) and the Bureau of Safety and Environmental Enforcement (BSEE) (together, participating agencies). The purpose of this MOA is to identify responsibilities of BSEE and the USCG for inspection and oversight of specified systems and sub-systems on Floating Outer Continental Shelf (OCS) Facilities. Implementation of this MOA will be in accordance with the Memorandum of Understanding (MOU) between the BSEE and the USCG, signed on 27 November 2012. The participating agencies will review their internal procedures and, where appropriate, revise them to accommodate the provisions of this MOA. This MOA replaces that part of Annex 1 of MMS/USCG MOA OCS-01: Agency Responsibilities (dated 30 September 2004) that refers to Floating OCS Facilities.

**B. AUTHORITIES**

The USCG enters this agreement under the authority of 14 U.S. Code (USC) §§ 93(a)(20) and 141.<sup>1</sup> The USCG regulates offshore activities pursuant to: the Outer Continental Shelf Lands Act (OCSLA), as amended, 43 USC §§ 1331 *et seq.*, including §§ 1333, 1347, 1348, 1356;<sup>2</sup> the Oil Pollution Act of 1990, 33 USC §§ 2701 *et seq.*, including 33 USC § 2712(a)(5)(A);<sup>3</sup> Section 311 of the Federal Water Pollution

<sup>1</sup> Pub. L. 112-213, Title II, § 202, 126 Stat. 1543 (2012); Pub. L. 104-324, Title IV, § 405(a), 110 Stat. 3924 (1996).

<sup>2</sup> Outer Continental Shelf Lands Act Amendments of 1978, Pub. L. 95-372, Title II, § 201, 92 Stat. 632.

<sup>3</sup> Oil Pollution Act of 1990, Pub. L. 101-380, Title I, § 1012 (codified as amended by Pub. L. 111-281, 124 Stat. 2984 (2010)).

Control Act, also known as the Clean Water Act, 33 USC § 1321;<sup>4</sup> the Maritime Transportation Security Act, 46 USC § 70103;<sup>5</sup> and Executive Order 12777.<sup>6</sup> Applicable USCG regulations are found under parts of Titles 33 (Navigation and Navigable Waters) and 46 (Shipping) of the Code of Federal Regulations (CFR). The USCG also exercises authority under the National Contingency Plan, 40 CFR Part 300.

The BSEE enters this agreement under the authority of OCSLA;<sup>7</sup> Section 311 of the Clean Water Act;<sup>8</sup> and Executive Order 12777.<sup>9</sup> Applicable BSEE regulations are found under relevant parts of Title 30 (Mineral Resources) of the CFR, including parts 250 and 254.

### **C. AGENCY RESPONSIBILITIES**

Floating OCS facilities are subject to USCG regulatory authorities under OCSLA for all matters relating to the promotion of safety of life and property, as well as for unregulated hazardous working conditions on the OCS. When a Floating OCS facility is temporarily attached to the seabed, BSEE regulates well operations on Floating OCS Facilities, including drilling, completions, workover, production, and decommissioning, and reviews and approves these facilities' oil spill response plans. The BSEE exercises safety and environmental enforcement functions related to Floating OCS Facilities, including, but not limited to, regulating and permitting OCS operations, conducting inspections and investigations, enforcing regulatory requirements, assessing penalties, and conducting research.

This MOA will guide the participating agencies in coordinating their respective regulatory activities concerning systems or operations on Floating OCS Facilities and will serve as a formal agreement by the participating agencies as to which agency has the lead for regulatory oversight of those systems or operations. Annex 1 of this MOA lists the systems and sub-systems associated with Floating OCS Facilities and the applicable lead agency. The lead agency is responsible for coordinating with the other agency as appropriate.

If during the course of any inspection, one agency identifies a potential violation of the other agency's regulations, the agency that identified the potential violation will notify the appropriate representative of the other agency.

### **D: DEFINITIONS**

For the purpose of this MOA, a Floating OCS Facility is defined as: a buoyant OCS facility, securely and substantially moored so that it cannot be moved without a special effort, or that is dynamically positioned. This term includes floating production storage and offloading units (FPSOs), floating production systems (FPSs) and floating storage and offloading systems (FSOs), but does not include Mobile Offshore Drilling Units (MODUs) and other vessels.

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<sup>4</sup> Federal Water Pollution Control Act of 1972, Pub. L. 92-500, § 311 (codified as amended by Pub. L. 107-303 (2002)).

<sup>5</sup> Maritime Transportation Security Act of 2002, Pub. L. 107-295, Title I, § 102(a) (as amended by Pub. L. 111-281, Title VIII, § 812(c), 124 Stat. 2997 (2010)).

<sup>6</sup> Exec. Order No. 12,777, 56 Fed. Reg. 54757 (1991).

<sup>7</sup> 43 USC §§ 1331 *et seq.*

<sup>8</sup> 33 USC § 1321.

<sup>9</sup> 56 Fed. Reg. 54757 (1991).

## E. GENERAL PROVISION

Nothing in this MOA alters, amends, or affects in any way the statutory authority of BSEE or the USCG. As required by the Antideficiency Act, 31 U.S.C. §§ 1341 and 1342, all commitments made by the participating agencies in this MOA are subject to the availability of appropriated funds and budget priorities. Nothing in this MOA, in and of itself, obligates the parties to expend appropriations or to enter into any contract, assistance agreement, or interagency agreement, or incur financial obligations. Any transaction involving transfers of funds between the parties to this MOA will be handled in accordance with applicable laws, regulations, and procedures under separate written agreements.

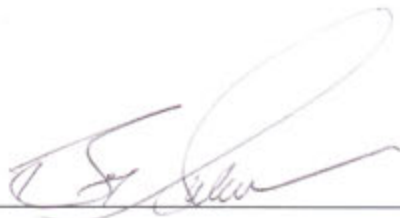
This MOA is not intended to, nor does it, create any right, benefit, or trust responsibility, substantive or procedural, enforceable at law or equity by any person or party against the United States, its agencies, its officers, or any other person. This MOA neither expands nor is in derogation of those powers and authorities vested in the participating agencies by applicable law. Nothing in this MOA is intended to conflict with current law or regulation or the directives of the USCG or BSEE. If a term of this MOA is inconsistent with such authority, that term is invalid, but the remaining terms and conditions of this MOA will remain in full force and effect.

## F. AMENDMENTS TO THE MOA

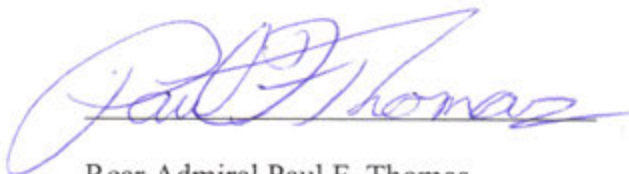
This MOA may be amended by mutual agreement of the participating agencies as described in Section I of the BSEE/USCG MOU dated November 27, 2012.

## G. TERMINATION

This MOA may be terminated by either of the participating agencies after providing 30-days advance written notice to the other agency.



Mr. Brian M. Salerno  
Director  
Bureau of Safety and Environmental Enforcement  
U.S. Department of the Interior



Rear Admiral Paul F. Thomas  
Assistant Commandant for Prevention Policy  
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ANNEX 1

**FLOATING OCS FACILITY SYSTEM/SUB-SYSTEM RESPONSIBILITY MATRIX**

This table lists the lead agency for regulatory oversight of systems and sub-systems associated with Floating OCS Facilities. Other agency roles are identified where applicable. The lead agency is responsible for coordinating with the other agency as appropriate. This list is primarily based on which agency has regulatory requirements that apply to the systems, subsystems, and components. It is not intended to be an exhaustive listing of all the subsystems and components. The applicable regulations should be consulted if there is any question about what specific requirements apply and which agency has the lead for those requirements. Although one agency has the lead for a specific system or subsystem, the other agency may also impose some regulatory requirements relevant to that system or subsystem (either directly or indirectly through standards incorporated by reference).

Item	System	Sub-System	Responsible Agency	Other Agency Role(s) and Comments
<b>1</b>	<b>Design and Operating Overview/Plan</b>			
1.a.		Deepwater Operations Plans/New Technology Document where applicable	BSEE	<p>A. <u>Conceptual Plan - General Design Basis and Philosophy</u>: (Per 30 CFR 250.289)</p> <p>B. <u>Deepwater Operations Plans (DWOP)</u>: (Per 30 CFR 250.292)</p> <p>C. <u>New Technology Document</u></p> <p>1) A discussion of any new technologies proposed, and</p> <p>2) A list of any alternate compliance procedures or departures proposed: (Per 30 CFR 250.141 and 142)</p>
1.b.		Design Basis Document	USCG	<p><u>Design Basis Document</u></p> <p>1) Description of the facility and its configuration;</p> <p>2) Design methodology, including method of analysis, design codes, regulatory requirements and environmental conditions;</p> <p>3) Design overview of primary structure and mooring system;</p> <p>4) Design overview of electrical and control systems, including automation and dynamic positioning (DP) systems if equipped;</p> <p>5) Design overview of hazardous area plan and electrical equipment within hazardous areas;</p> <p>6) Design overview of marine and utility systems;</p> <p>7) Design overview of fire-protection, lifesaving equipment and safety systems;</p> <p>8) Design overview of the in-service inspection plan for the hull, including philosophy, methodology and drawings of areas to be inspected;</p> <p>9) Design overview of intact and damage stability criteria, and for tension leg platforms (TLPs) information on the tendon tension load monitoring system;</p> <p>10) Description of any unique or novel design aspects; and</p>

				11) For converted facilities, a summary of previous service, certifications and classification status and an overview of any structural modifications proposed.
1.c.		Platform Verification Program (PVP)	BSEE	<p>A. <u>Design Verification Plan</u>:</p> <p>1) Documentation of the design including location plat, site specific geotechnical report, contract design drawings and met-ocean data;</p> <p>2) Abstract of computer programs used for design process; and</p> <p>3) Summary of major design considerations and approach to be used for verification.</p> <p>B. <u>Fabrication Verification Plan</u>:</p> <p>1) Approved for fabrication drawings and material specifications;</p> <p>2) Primary load bearing members included in the space-frame analysis; and</p> <p>3) A summary description of structural/fabrication specifications, tolerances, quality assurance, material quality controls/placement methods and methods/extent of non-destructive evaluation.</p> <p>C. <u>Installation Verification Plan</u>:</p> <p>1) Summary description of planned marine operations during installation;</p> <p>2) Contingencies considerations;</p> <p>3) Alternative courses of action; and</p> <p>4) An identification of areas to be inspected, specifying acceptance and rejection criteria.</p>
<b>2</b>	<b>Unit Design, Fabrication, Installation, Modifications and Repairs</b>			
2.a.		Non-ship shape hull	USCG	All aspects will be reviewed according to respective agency regulations.
			BSEE	All aspects will be reviewed according to respective agency regulations, including the requirement for a Certified Verification Agent (CVA).
2.b.		Ship-shape hull	USCG	All aspects will be reviewed according to respective agency regulations.
			BSEE	All aspects will be reviewed according to respective agency regulations, including the requirement for a CVA.
2.c.		Top side structures	USCG	Responsible for structures relating to marine systems, lifesaving equipment, accommodations, crane foundations, helicopter decks and other appurtenances.
			BSEE	Responsible for structural components relating to drilling, production, completion, well servicing and workover operations.
2.d.		Turret and turret/hull interface structure	BSEE	Will review the design of the turret and turret/hull interface structure.
			USCG	Will review the design of the hull structure interface with the turret.
2.e.		Design met-ocean conditions	BSEE	Establishes site specific design met-ocean criteria.
			USCG	Establishes design met-ocean criteria for intact and damage stability.

2.f.		Risers (drilling, production, and pipeline)	BSEE	Some pipeline risers may be subject to jurisdiction of the Pipeline and Hazardous Materials Safety Administration (PHMSA).
3	<b>Floating Stability</b>			
3.a.		Non-ship shape floating facilities	USCG	Reviews and approves stability and sends copies to BSEE. For a TLP, stability approvals include consideration of outputs from the tendon tension load monitoring system.
3.b.		Ship-shape floating facilities	USCG	Reviews and approves stability and sends copies to BSEE.
4	<b>Station Keeping</b>			
4.a.		Foundations	BSEE	
4.b.		Mooring and tethering systems	BSEE	Responsible for site specific mooring analyses. This includes the tendons and tendon tension load monitoring system on TLPs. This also includes turret systems that act as the mooring system.
			USCG	Responsible for conventional ship anchoring equipment.
4.c.		Design of dynamic positioning systems	USCG	Review of design and test procedures and witness tests aboard vessel for all DP systems and related automation of electrical plant and distribution system.
4.d.		Operation of dynamic positioning systems	BSEE	Responsible for criteria for shut-in and disconnect when out of the watch circle.
			USCG	USCG mandates all other operational criteria.
5	<b>Drilling, Completion, Well Servicing and Workover Equipment</b>		BSEE	Includes, but is not limited to, the following: 1) Drilling, production, and workover riser; 2) Blowout prevention equipment and control systems; 3) Drilling system and related relief valves, vent system, pressure vessels and pipeline, pumps, water systems, and safety systems; 4) Riser and guideline tensioning systems; 5) Motion compensating systems, 6) Instruments and controls; 7) Atmospheric vessels and piping; 8) Fitness of the drilling unit; 9) Lifting and hoisting equipment associated with the derrick; 10) Cementing systems and related equipment; 11) Circulating systems and related equipment, including: pipes and pumps for drilling fluids, workover and well servicing fluids, shale shakers, desanders, degassers and related equipment; 12) Structures including derrick and sub-structure; 13) Bulk material storage and handling systems; 14) Other pressurized systems designed for industrial operations; 15) Diverter system; 16) Drill-string safety valves; 17) H2S and H2S monitoring; 18) Flare system; and 19) Seawater for production systems.

6	<b>Production Systems</b>			
6.a.		Production System Components	BSEE	Includes, but is not limited to, the following: 1) Hydraulic and pneumatic systems; 2) All risers; 3) Production safety systems including subsurface and surface safety valves; 4) Relief valves, relief headers, vent and flare systems; 5) Production wells and wellhead; 6) Instrumentation, controls, and measurement (including oil and gas); 7) Gas compression; 8) Process system and related pumps; 9) Odorization for gas piped into enclosures; 10) Process system and related pressure vessels and piping; 11) Process system and related heat exchangers, including waste heat recovery units; 12) Chemical injection and treatment systems; and 13) Metering systems.
6.b.		Produced hydrocarbons, fuel and flow assurance fluid tanks (FPSOs addressed below)	BSEE	All tanks outside the hull of the unit and level safety systems on all storage tanks.
			USCG	All tanks inside the hull of the unit.
7	<b>Produced Hydrocarbon Pipeline Operations and Components</b>		BSEE	Pipelines may be subject to jurisdiction of DOT, PHMSA as defined in the 1996 DOT/DOI MOU on OCS Pipelines.
8	<b>FPSO Produced Hydrocarbon Offloading Equipment and Procedures</b>		USCG	USCG and BSEE have shared jurisdiction from the end of the production process to Lease Automated Custody Transfer (LACT) Unit. USCG has jurisdiction over all pumps and piping covered by 46 CFR Subchapter D and F.
			BSEE	USCG and BSEE have shared jurisdiction from the end of the production process to LACT Unit. BSEE has jurisdiction over production safety systems/devices covered by 30 CFR 250 Subpart H.
9	<b>Utility Systems</b>			
9.a.		Boilers, pressure vessels, waste heat recovery systems (from any engine exhaust), water heaters and other piping or machinery	USCG	Equipment/systems associated with the unit's emergency, dynamic positioning, and ship-service systems.
			BSEE	Equipment/systems supporting drilling, production, completion, well servicing and workover operations.
9.b.		High pressure (HP) wash down	USCG	Equipment/systems associated with the unit's emergency and ship-service systems.
			BSEE	Equipment/systems components and piping supporting drilling, production, completion, well servicing and workover operations.
9.c.		Seawater supply system	USCG	Includes sea chests and sea chest valves supplying water to such systems as ballast system, fire-fighting system and engine cooling system.
9.d.		Compressed air	USCG	Equipment/systems associated with the unit's emergency and ship-service systems.

			BSEE	Equipment/system components and piping supporting drilling, production, completion, well servicing and workover operations.
9.e.		Potable water and sanitary water	USCG	
9.f.		Sewage unit and piping	USCG	All hardware and associated equipment. MARPOL Annex IV International Sewage Pollution Prevention Certification.
			BSEE	Discharge permits (see item 17.b.)
9.g.		Diesel fuel systems	USCG	Responsible for diesel fuel systems related to marine systems, lifesaving equipment, accommodations and cranes.
			BSEE	Responsible for all diesel fuel systems related to drilling, production, completion, well servicing and workover operations.
9.h.		Bilge and ballast, including pumps and related control systems	USCG	
9.i.		Fuel gas from well	BSEE	When powering drilling, production, completion, well servicing and workover operations.
			USCG	When supplied to the prime movers, emergency cutoff valve when powering emergency and ship service systems.
9.j.		Blanket Gas Systems	BSEE	Responsible for gas systems related to production equipment.
			USCG	Responsible for gas systems tied into structure of the hull.
10	<b>Lifts, Elevators and Personnel Transfer</b>		USCG	
11	<b>Helicopter Landing and Refueling</b>	Decks, fuel handling and storage	USCG	
12	<b>Fire Safety Equipment and Systems</b>	Fire protection, detection, and extinguishing	USCG	BSEE's role in fire protection is addressed in section 24.k.
13	<b>Safety Systems</b>			
13.a.		Emergency shut-down (ESD) system and components	BSEE	For BSEE required systems. All safety systems and components associated with drilling, production, completion, well servicing and workover operations, including but not limited to the control of the well.
13.b.		Safety trip controls	USCG	For USCG required systems. Auto safety limit controls (46 CFR 62.25-15).
13.c.		Gas detection systems approval	USCG	
13.d.		Gas detection in surface production safety systems and drilling fluid handling areas (if applicable)	BSEE	
13.e.		General alarm	USCG	Includes public address system when integrated with the general alarm system.
14	<b>Electrical Design and Equipment</b>			
14.a.		Production	BSEE	See item 6.a., comments, for list of System/Components.



14.b.		Dedicated electrical power generation plants and loads for drilling, completion, well servicing, and workover operations	BSEE	See item 5, comments, for list of drilling, completion, well servicing and workover equipment. This includes both permanent equipment and equipment installed for a finite time and designed for removal (temporary equipment).
14.c.		Electrical power generation plants and loads for marine/ship's service	USCG	When electrical power generation plants are shared between marine/ship's service loads and production, drilling, completion, well servicing and workover operations, the overall functionality between the electrical power generation plants, including the operation of the automatic electrical power management system (if installed) is a USCG responsibility, with careful attention paid to maintaining continuity of electrical power to essential marine/ship's services and critical production, drilling, completion, well servicing and workover operations.
			BSEE	All critical electrical equipment and devices for production, drilling, completion, well servicing and workover operations.
14.d.		Emergency power generation and distribution	USCG	All connected loads serviced by emergency generator or any other emergency power source.
			BSEE	All connected loads serviced by emergency generator that are critical for production, drilling, completion, well servicing and workover operations.
14.e.		Automated, vital and essential system	USCG	All automated systems including any shared automated system related to topside.
14.f.		Classification of hazardous locations	USCG	Makes determination of all hazardous location classifications. Ventilation systems within hazardous locations are under the scope of this section.
			BSEE	Reviews hazardous area classification drawings and ensures compliance with current regulations.
14.g.		Hazardous equipment certification	USCG	Reviews electrical equipment located within hazardous areas that is tested and listed by a Coast Guard accepted Independent Laboratory.
			BSEE	Ensures that all electrical equipment installed in hazardous areas is tested and approved by a nationally recognized testing laboratory (NRTL). Requests for departures from this requirement may be submitted to the applicable BSEE District Manager for determination.
15	<b>Aids to Navigation</b>		USCG	
16	<b>Communications</b>		USCG	Marine Communications.
			BSEE	Drilling, completion, production, well-servicing, and workover-related Communications.
17	<b>Pollution Prevention</b>			
17.a.		Prevention of unauthorized discharges to marine environment on location	USCG	Enforces the International Convention for the Prevention of Pollution from Ships (MARPOL 73/78), as implemented in the Act to Prevent Pollution from Ships (APPS) (e.g. oil, garbage, etc). All other equipment and oil storage tanks on FPSOs or similar units.

			BSEE	Enforces Drilling, Completion, Well Servicing, and Well Workover ( <i>see</i> Item 5). All oil production related equipment ( <i>see</i> Item 6). For oil storage tanks on FPSOs or similar units, BSEE has applicable containment requirements on all storage tanks.
17.b.		EPA National Pollution Discharge Elimination System	USCG	Checks compliance with EPA issued Vessel General Permit (VGP). Includes notice of Intent and all record keeping associated if applicable per 33 CFR 151.25(m).
			BSEE	Monitor and inspect OCS facilities for compliance with NPDES permits requirements. BSEE (Environmental Compliance) coordinates with EPA when non-compliance with NPDES permits is detected to determine the appropriate agency actions.
17.c.		Petroleum and other product transfers to and from a vessel (includes on-loading of produced hydrocarbons)	USCG	
17.d.		All floating units while in transit or off location	USCG	
18	<b>Cranes</b>			
18.a.		Crane design, certification, and operations including material handling equipment dedicated solely to ship-services, lifesaving, marine system maintenance, etc.	USCG	
18.b.		Material handling equipment dedicated solely to drilling, completion, well servicing, and workover operations.	BSEE	
19	<b>Ventilation</b>			
19.a.		Areas dedicated to drilling, completion, production, well servicing and workover operations	BSEE	Ventilation systems for hazardous locations are covered under the scope of section 14.f.
19.b.		Drilling Fluid Handling Areas	BSEE	Responsible for hazardous locations within drill area.
19.c.		All other areas	USCG	
20	<b>Lifesaving Equipment</b>		USCG	
21	<b>Workplace Safety and Health</b>		USCG	The USCG has regulations in 33 CFR Subchapter N which specifically address Workplace Safety and Health.
21.a.		Personnel protection equipment	USCG	
21.b.		General workplace conditions	USCG	BSEE also has regulations covering safe workplace conditions under 30 CFR Part 250.
21.c.		Free from recognized hazards	USCG	

22	<b>Living Quarters and Accommodation Spaces</b>		USCG	Includes permanent and portable units design and arrangement.
23	<b>General Arrangements</b>	Physical location and type of spaces including access/egress and means of escape	USCG	
24	<b>Inspections, Drills and Operational Requirements</b>			
24.a.		Structural inspection requirements	BSEE	Inspects all structural components related to drilling, production, completion, well servicing and workover operations. This would include all required structural assessments after a severe weather event.
			USCG	Responsible for all inspections of the hull and structures relating to marine systems, lifesaving, accommodations, crane foundations and other appurtenances. This would include all required structural assessments and those prescribed in the In Service Inspection Plan (ISIP) including those items related to post weather events.
24.b.		Manning requirements for marine operations	USCG	
24.c.		Drills – fire and abandon ship	USCG	
24.d.		Inspection and testing of drilling, production, completion, well servicing and workover operations.	BSEE	
24.e.		Well control, oil spill and hydrogen sulfide (H2S) drills	BSEE	Oil spill drills for drilling, completion, production, well servicing and well workover components.
24.f.		Inspection and testing of marine and lifesaving equipment	USCG	
24.g.		Facility decommissioning and removal.	BSEE/USCG	Both agencies to consult at beginning of process.
24.h.		Facility Life extension.	BSEE/USCG	Both agencies to consult at beginning of process.
24.i.		Diving operations and equipment	USCG	
24.j.		Inspection of mooring systems	BSEE	This includes the tendons and tendon tension load monitoring system on TLPs. USCG to be notified if the tendon tension load monitoring system is not functioning properly.
			USCG	Responsible for conventional ship anchoring equipment.
24.k.		Fire protection in production, drilling and storage tank areas	BSEE	Responsible for fire safety and inspection of firefighting equipment related to production, drilling equipment, and storage tanks.

25	<b>Plans</b>			
25.a.		Emergency evacuation plans	USCG	
25.b.			BSEE	
25.c.		H2S contingency plan (including equipment, control, personnel training and detection systems)	BSEE	Includes H2S personnel protection equipment.
25.d.		Security Plan (if applicable)	USCG	
25.e.		Safety plan, fire control or fire equipment, lifesaving equipment plans	USCG	
25.f.		USCG required operations manual	USCG	
25.g.		BSEE Deepwater Operations Plans (DWOP)	BSEE	
25.h.		Oil Spill Response Plan	BSEE	Covers all oil production related equipment (see table item 5 – Drilling, Completion, Well Servicing and Well Workover; table item 6 – Production Systems); pipelines, fuel sources supporting drilling, completion, production, well servicing and well workover, but excluding oil storage tanks on FPSOs or similar units. See 30 CFR 254 for specific plan requirements.
25.i.		Vessel Response Plan	USCG	Covers all other equipment fuel sources and oil storage tanks whether above or below deck on FPSO, or similar unit. To be submitted 60 days prior to planned operations as per 33 CFR 155.1065(a). See 33 CFR 155 Subpart D for specific plan requirements.
25.j.		Mooring Inspection Maintenance Repair Replacement Plan	BSEE	This includes tendons and tendon tension load monitoring system on TLPs.
25.k.		Design Verification Plan	BSEE	Applies to the BSEE's Platform Verification Program to include nomination of a CVA.
25.l.		Fabrication Verification Plan	BSEE	Applies to the BSEE's Platform Verification Program to include nomination of a CVA.
25.m.		Installation Verification Plan	BSEE	Applies to the BSEE's Platform Verification Program to include nomination of a CVA.
25.n.		Safety and Environmental Management System (SEMS)	BSEE	When 30 CFR Part 250 Subpart S applies.
25.o.		Safety Management System (SMS)	USCG	When 33 CFR Part 96 and the ISM Code apply.
25.p.		In Service Inspection Plan	USCG	
25.q.		Oil Transfer Procedures	USCG	
26	<b>Turret Operations</b>	Quick disconnect-able turrets, swivel stacks and associated buoys	BSEE	BSEE sets the requirements for FPSO/FPU disconnect, how quickly, and under what circumstances (ESD, other abnormal conditions, exceeding watch circle).
			USCG	Operation of quick disconnect function.

27	<b>Administer Shutdown or Resumption of Operation of a Facility</b>		BSEE	Specifies conditions for a shut-down of subsea systems through boarding shutdown valve.
28	<b>Financial Solvency/Default</b>		BSEE/USCG	Both agencies to consult at the beginning of the process. BSEE will consult with BOEM as part of this process.
29	<b>Safety Analysis</b>	Safety analysis of industrial systems	BSEE	