

**UNITED STATES DEPARTMENT OF THE INTERIOR
MINERALS MANAGEMENT SERVICE**

NTL No. 2002-N06

Effective Date: July 11, 2002

**NOTICE TO LESSEES AND OPERATORS OF FEDERAL OIL, GAS, AND SULPHUR
LEASES IN THE OUTER CONTINENTAL SHELF**

Guidelines for Crane Load Tests and Recordkeeping on Fixed Offshore OCS Facilities

This Notice to Lessees and Operators (NTL) is issued to address certain safety concerns and questions recently brought to our attention with respect to cranes installed on fixed offshore platforms. Regulations at 30 CFR 250.108 address cranes and other material handling equipment on fixed offshore platforms. Section 250.108(a)(1) incorporates by reference the American Petroleum Institute's Recommended Practice for Operation and Maintenance of Offshore Cranes (API RP 2D), Fourth Edition, into the Minerals Management Service (MMS) regulations. Section 250.108(a)(2) requires that inspection, testing, and maintenance records must be kept at the OCS facility for at least 2 years.

Recently, MMS has received questions concerning recordkeeping and the API RP 2D, Appendix E, Note 2, on load testing procedures which states:

"2. Crane shall be thoroughly inspected per API Recommended Practice 2D, 4.1.2 "Annual Inspection," before and after the test. Attention should be given to rigging used to attach loads. Tag lines should be used on test loads."

Therefore, you must perform an "annual inspection" in accordance with Appendix E, Note 2, before and after conducting a load test. According to § 250.108(a)(2), you must keep documentation on inspections at the OCS facility. These records should be readily accessible to MMS and provided upon request.

Appendix E—Commentary on Load Testing of API RP 2D states that, "***A crane load test is required under the following conditions:***

- 1. New cranes being placed in service.***
- 2. Cranes that are being permanently relocated.***
- 3. Temporary/rental cranes after each rig-up or relocation."***

Temporary/rental crane installations are an area of particular concern. These cranes must be inspected according to the guidelines in API RP 2D, Section 4.1.2, which states that, "***Careful consideration will be given to the installation of temporary rental crane support structures.***" A recent accident involving the connection of a temporary/rental crane to a fixed platform reinforces our concern over the safety of temporary/rental cranes. You are responsible for ensuring that records of the installation inspection are retained and available for MMS review according to § 250.108(a)(2).

Additionally, API RP 2D, section 5.1.6, specifies, "*A wire rope manufacturer's test certificate must be supplied to the Owner. Tests will be performed as outlined in API Specification 9A, latest edition. These tests will include an actual break certificate.*" Section C.5.1.3, Wire Rope Replacement Criteria, states that standing ropes include "*boom pendants.*" Although MMS does not require pendants to be tagged, the documentation provided by the manufacturer for boom pendant lines should be retained at the facility as part of the inspection, testing, and maintenance records required under § 250.108(a)(2).

Paperwork Reduction Act of 1995 (PRA) Statement: The information collection referred to in this NTL provides clarification, description, or interpretation of requirements in the 30 CFR 250, subpart A regulations. The Office of Management and Budget (OMB) has approved the information collection requirements and assigned OMB control number 1010-0114. This NTL does not impose additional information collection requirements subject to the PRA.

Contact: If you have any questions on this NTL, you may contact Wilbon Rhome, Operations Analysis Branch, Engineering and Operations Division, (703) 787-1587.

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Date



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