

## Operational Duties

As Written.

### § 197.220 Commercial diving operators

(i) All dive team members participate in a dive planning meeting before each dive that the meeting ensures that a dive plan is prepared specific to each dive identifying the person in charge of the vessel or facility, the dive supervisor, and the roles and responsibilities of all dive team members, the anticipated conditions and risks that could affect the dive and risk management measures implemented to reduce risks; and that each dive team member reviews and signs the plan to document participation in the meeting and agreement with the plan;

**197.220 9(i) as written has it has good intent but no one could afford to comply with it as written.**

**WHY:** You cannot write this as though we are talking about one dive, or mode of diving.

- (1) The divers work in rotation, the rest of the dive crew, Supervisor, Rack Operator and dive tenders, work a shift. You cannot get everyone out of bed every time you make a dive.
- (2) When doing surface decompression you would have to wait until the tender and the diver from the previous dive had completed their Surface Decompression. When Surface Gas diving this can take upward of three hours, depending on depth of dive and bottom time.
- (3) When in Saturation Diving you are working around the clock. The Dive Supervisors, LST's, Sat Techs, Surface Divers and Tenders work shift work. The Saturation Divers are under pressure in the Saturation Chamber on deck or in the Dive Bell working on the bottom.

### 197.220 9 (i)

**Should say:**

(i) At the start of each diving operation, job: The prepared dive plan shall be reviewed with all members of the dive crew. At the start of each shift a Safety Meeting shall be held, JSAs pertinent to the shifts anticipated tasks must be reviewed and signed by the crew on shift. Changes to the dive plan must be discussed with the involved team members. Major changes involving dive mode or unplanned equipment changes must be addressed with a Management of Change process and the Client Representative and PIC of the vessel or installation must be aware of the procedural change(s).

John Carl Roat

Quality Manager & ISO Team Member



Legacy Offshore Int.

Po Box 174

Amelia LA. 70340

Mobile: 337-316-0394

