



NATIONAL SHIPPING ADJUSTERS



TECHNICAL LETTER No. 27/2024

FROM: NASHA Technical Department
TO: NASHA surveyor / Organization Members
SUBJECT: Request for Enhanced Attention to Recurring Deficiencies
During Surveys (2024 PSC Inspection Analysis)
DATE: December 31st, 2024

Dear Organization Members / Surveyors

Following a detailed analysis of Port State Control (PSC) inspection findings and detentions across our fleet in 2024, we have identified recurring deficiencies that require heightened attention during class surveys. To strengthen compliance, reduce detention risks, and improve Recognized Organization (RO) performance, we request that priority focus be given to the following areas and related equipment:

1. Water/Weathertight Conditions (Deficiency Code 03108)

Focus Areas:

- Verify integrity of ventilator closures, air pipe covers, and casing seals.
- Inspect for corrosion, cracks, or improper sealing in coamings and weathertight doors.
- Confirm compliance with Load Line Convention (LLC) and SOLAS Ch. II-1/Reg. 19.

Action: Conduct operational tests for closures and review maintenance records for critical zones (e.g., machinery spaces, deck fittings).

2. Safety of Navigation

- Deficiency Code 10109 (Lights, Shapes, Sound Signals):

- Verify functionality of navigation lights, sound signals, and day shapes (COLREG).
- Inspect wiring, fuse protection, and backup power systems.

- Deficiency Code 10111 (Charts):

- Confirm updated nautical charts, ECDIS backups, and corrections.



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Action: Cross-check chart updates with the latest Notices to Mariners and test emergency lighting.

3. Fire Safety

- Deficiency Code 07116 (Ventilation Systems):

- Test fire damper functionality, ventilation shut-offs, and duct integrity (SOLAS Ch. II-2/Reg. 9).

- Deficiency Code 07105 (Fire Doors/Openings):

- Ensure self-closing mechanisms, insulation, and alignment of fire doors (FSS Code Ch. 9).

- Deficiency Code 07113 (Fire Pumps/Pipes):

- Inspect fire pump pressure, pipe corrosion, and isolation valve accessibility.

Action: Perform fire pump operational tests and validate fire drill records.

4. Life-Saving Appliances

- Deficiency Code 11104 (Rescue Boats):

- Check engine functionality, release mechanisms, and inventory (SOLAS Ch.III/Reg. 31).

- Deficiency Code 11110 (Liferaft Stowage):

- Confirm proper stowage, hydrostatic release units (HRUs), and expiry dates.

Action: Validate monthly inspection logs and conduct deployment drills.



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5. Propulsion & Auxiliary Machinery (Deficiency 13102)

Focus Areas:

- Inspect auxiliary engines for leaks, abnormal vibrations, and exhaust defects.
- Test alarm/shutdown systems (e.g., low oil pressure, high temperature).
- Review maintenance logs for fuel injectors, pumps, and filters.

Action: Perform running tests under load and verify alarm thresholds.

6. ISM Compliance (Deficiency 15150)

Focus Areas:

- Verify documentation (e.g., SMM, PMS) aligns with ISM Code requirements.
- Assess crew familiarity with safety procedures and reporting protocols.
- Check non-conformity records and corrective actions.

Action: Audit ISM documentation and interview crew during surveys.

7. Emergency Systems (Deficiency 04108)

Focus Areas:

- Confirm muster lists are updated, posted, and reflect current crew.
- Test emergency lighting, alarms, and communication systems.



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Action: Validate drill records and emergency training schedules.

Additional Guidance:

- Proactive Compliance: engage with vessel crews to address minor issues before they escalate into deficiencies.
 - Documentation: Ensure all corrective actions are recorded in class surveys and shared with owners/operators and advise Ship master to use Form P-Q-10-F-02 for PSC inspection list before port Arrival to confirm vessel compliance and avoid Detentions.
 - Training: Highlight recurring issues during pre-survival meetings to reinforce crew awareness.
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By prioritizing these areas, we aim to improve fleet compliance, reduce PSC detentions, and uphold the integrity of our RO services. Should you require further clarification or support, please contact us.

Thank you for your diligence and cooperation in advancing our shared commitment to maritime safety.

Best regards,


 NATIONAL SHIPPING
ADJUSTERS, INC.

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