

Comment/question, 31<sup>st</sup> July 2008

## Chapter 3 Section 6 “Structural Arrangement Principles”

Re: 10.4.7 – Lower Stool – Rule includes, the inadequately discussed changes proposed in “Corrigenda 5” as quoted below by ignoring our previous comments:

*Quote:*

*Where corrugations are cut at the lower stool, corrugated bulkhead plating is to be connected to the stool top plate by full penetration welds. The stool side plating is to be connected to the stool top late and the inner bottom by either **full penetration or deep penetration welds**. The supporting floors are to be connected to inner bottom by either **full penetration or deep penetration weld**.*

*Unquote*

*Versus the following text as submitted by IACS UR S18 (1998) to IMO for the inception of SOLAS Ch. XII.*

*Quote:*

*Where corrugations are cut at the lower stool, corrugations and stool side plating are generally to be connected to the stool top plate **by full penetration welds**. The plating of lower stool and supporting floors is generally to be connected to the inner bottom **by full penetration welds**.*

IACS should really consider very closely their submittals to IMO for the development of SOLAS Ch. XII and assure their similarities and consistency. Unless IACS wishes to resubmit the bulkhead welding requirements to IMO with proposed changes for approval by all IMO Administrations, such changes should be avoided.

Until such time we hereby request IACS to replace the text as per the original CSR wording that is in agreement with IACS UR S18 originally submitted to IMO.