

Regional Citizens' Advisory Council / "Citizens promoting environmentally safe operation of the Alyeska terminal and associated tankers."

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Prince William Sound
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PWS Response Planning Group
C/O Captain Thomas Colby
Alaska Tanker Company
P.O. Box 1609
Valdez, Alaska 99686

Dear Captain Colby:

Subject: Towing Exercises at Closure Conditions

Prince William Sound Regional Citizens' Advisory Council (PWSRCAC) would like to bring to the attention of the Trans-Alaska Pipeline System (TAPS) shippers, Alyeska Pipeline Service Company (APSC), United States Coast Guard (USCG) and the Alaska Department of Environmental Conservation (ADEC) ongoing concerns that exist within our organization regarding the lack of tanker towing exercises at or close to closure conditions in Prince William Sound.

PWSRCAC believes that it is environmentally unsafe to move oil in conditions in which it is unsafe to exercise a tanker save by SERVS.

PWSRCAC is requesting that towing exercises be conducted at or close to closure conditions. An incremental approach is requested starting at winds of 25 knots through to exercising at the established closure limit of 15-foot significant seas and 45-knot winds. PWSRCAC requests that a tanker towing work group be convened to include TAPS shippers, APSC, USCG, PWSRCAC and the ADEC and a schedule and guidelines for these exercises be established.

All exercises would be conducted with respect to prudent consideration of safety factors and at the agreement of both ship and tug masters.

At a minimum, exercises should include:

- All exercises begun from normal escort positions for Hinchinbrook Entrance
- Include normal making-up procedures using the standard 30/30 second recognition/response delay.
- Hard right rudder at 10 knots with rescue performed by an ETT and then a PRT respectively.
- Rudder locked at 15 degrees right with rescue performed by an ETT and then a PRT respectively.
- Rudder locked at 15 degrees left with rescue performed by an ETT and then a PRT respectively. This approximates the turn now made inside Hinchinbrook Entrance.
- Stopping the ship from 10 knots. To be done by each type of tug with rudder angles of hard over, 15 degrees and amidships.
- Tow from the stern with rudder hard over right and left.
- Tow from the stern with rudder at 15 degrees right and left.
- Attach to the ship's bow and tow on a designated course with each type of tug towing with various ruder angles.

PWSRCAC has repeatedly requested that towing exercises be conducted at or close to closure conditions and although towing exercises have been conducted, none have taken place in conditions close to or at closure conditions. Reluctance to conducting towing exercises at or close to closure conditions has been expressed by the shippers and SERVS, on the grounds of safety to personnel and equipment. at least two attempts have been made during the past two years to conduct towing exercises in higher sea states but the weather has been less than the forecast predicted.

PWSRCAC would like a more vigorous schedule and commitment from the shippers, APSC, USCG and ADEC to follow through with towing exercises in higher sea states. PWSRCAC fully understands both the variable nature of weather and the extremely important safety aspects of this type of exercise and are not requesting any unsafe work practices be conducted.

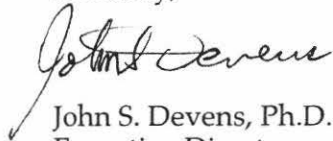
However, how can it be expected that a rescue can be affected at closure conditions in a safe manner if crews are not experienced and practiced in operating in such conditions?

PWSRCAC request the following actions take place:

- A tanker towing exercise work group be convened and consist of representatives from the shippers, SERVS, ADEC, USCG and PWSRCAC. A deadline and schedule be developed to conduct towing exercises in Prince William Sound at conditions that approach closure conditions.
- Generate a set of Standard Operating Procedures for these towing exercises that will allow all players to have input on the exercises and also on the method and types of data collected to assess the effectiveness of the exercise.
- Clarify and document the chain of command for the exercises and discuss safety during the exercises, and agree on the data collection procedure.
- Collect data to confirm the effectiveness of equipment at closure conditions.

PWSRCAC looks forward being involved in a workgroup to develop a schedule to conduct these towing exercises in a safe and prudent manner in conditions close to or at closure conditions in Hinchinbrook Entrance.

Sincerely,



John S. Devens, Ph.D.
Executive Director

Cc: David Wight, Alyeska President
Dan Hisey, Alyeska
Richard Ranger, Alyeska
Ed Morgan, Alyeska/SERVS
Commissioner Ernesta Ballard, ADEC
John Kotula, ADEC
CDR Mark Swanson, USCG MSO Valdez