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FM COMNAVSAFECOM NORFOLK VA

TO ALSAFE

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SECINFO/U//

MSGID/GENADMIN/COMNAVSAFECOM/30/JUN//

SUBJ/NAVSAFECOM ADVANCED CHANGE NOTICE FOR REMOVAL OF BROW NET REQUIREMENT
WHILE IN DRY DOCK//

REF/A/DOC/OPNAVINST 5100.19//

REF/B/DOC/NAVSEA S0570-AC-CCM-010/8010, REV 1//

REF/C/DOC/NAVSEA GSO//

NARR/REF A IS OPNAVINST 5100.19F, NAVY SAFETY AND OCCUPATIONAL HEALTH
PROGRAM MANUAL FOR FORCES AFLOAT. REF B IS NAVSEA TECHNICAL PUBLICATION,
INDUSTRIAL SHIP SAFETY MANUAL FOR FIRE PREVENTION AND RESPONSE. REF C IS
THE GENERAL SPECIFICATION FOR THE OVERHAUL OF SURFACE SHIPS.//

POC/CAPT SCOTT JONES/NAVSAFECOM/DEPUTY COMMANDER/NORFOLK/DSN 564-3520
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GENTEXT/REMARKS/1. This ALSAFE applies to all US Navy afloat commands.

Reference (a), Section D, Chapter 4, paragraph 3.n, which only applies to

submarines in dry dock states, "Safety nets must be rigged extending a minimum of 6 feet on both sides under all access brows between the ship and the dock apron." Reference (a), Section C, Chapter 8, paragraph 5.k.(2), which applies only to surface ships in dry dock states, "safety nets must be installed under gangways and platforms that are not fitted with both side rails having a vertical height of 42 inches nominal and metallic meshing or similar material with small openings (approximately 2-1/2 inch) between the top of the rail and the gangway platform deck."

2. The policy incorrectly implies that brow nets are a suitable alternative to handrails as a fall protection mitigation. This is inconsistent with the federal code of regulations fall protection requirements. Additionally, the policy implements a different standard between ships and submarines while in the dry dock.

3. This ALSAFE serves as advanced notice that NAVSAFECOM is updating the policy. The requirement by either ships or submarines to use brow nets while in dry dock is rescinded. Furthermore, brow nets cannot be used as an alternative mitigation in lieu of 42 inch handrails for either gangways or platforms. Brow nets may be used as a supplemental mitigation measure.

4. The new policy to be codified in an update to OPNAV-M 5100.23 will be applicable only to ships and submarines while in dry dock: "Gangways and platforms must be outfitted with side rails on applicable sides having a vertical height of 42 inches nominal and metallic meshing or similar material with small openings (approximately 2-1/2 inch) between the top rail and the gangway Platform deck."

5. Request NAVSEA use the requirement codified in paragraph 4 above to update both reference (b) and (c) as appropriate.

6. Compliance with this new policy is required by 30 January 2026. Request NAVSEA work with TYCOMs and shipyards to verify brows are compliant and, if necessary, develop plan to achieve compliance for all navy ships and submarines in dry dock.

7. This ALSAFE will remain in place until OPNAVINST 5100.19F is integrated into the OPNAV-M 5100.23.//

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