

**UNITED STATES DEPARTMENT OF THE INTERIOR  
BUREAU OF SAFETY & ENVIRONMENTAL ENFORCEMENT**

NTL No. 2024-R03

Effective Date: 12/06/2024

NATIONAL NOTICE TO LESSEES, GRANTEES, AND OPERATORS OF FEDERAL  
RENEWABLE ENERGY LEASES, RIGHTS-OF-WAY GRANTS, AND ALTERNATE USE  
RIGHTS-OF-USE AND EASEMENT GRANTS

**Professional Stamping of Engineering Drawings and Reports**

**INTRODUCTION**

This Notice to Lessees (NTL) provides guidance regarding the engineering drawings and associated reports that are required to be submitted to the Bureau of Safety and Environmental Enforcement (BSEE) pursuant to 30 CFR 285.701 and 285.702. Those provisions require the Facility Design Report (FDR) and/or the Fabrication and Installation Report (FIR) to be submitted for BSEE review. The regulation at 30 CFR 285.701(d) also requires a certification statement that includes the location of certified design and as-built plans and specifications.

This NTL provides guidance on what you should include in your FDRs and FIRs to help you demonstrate that your designs and activities will follow best engineering practices, ensure safety, and not cause undue harm. This NTL also provides guidance for making as-built drawings and other reports available to BSEE in specified timeframes. Appendix A provides additional clarity on submittal details.

**STATUTORY AND REGULATORY AUTHORITY**

This NTL is developed in accordance with the following statutes and regulations:

- A. The Outer Continental Shelf Lands Act, as amended, 43 USC §§ 1331 *et seq.*
- B. 30 CFR 285 Subpart G – Facility Design, Fabrication, and Installation

**ACRONYMS**

The following acronyms are used within this NTL and are provided for clarity:

BSEE	Bureau of Safety and Environmental Enforcement
CFR	Code of Federal Regulations

CVA	Certified Verification Agent
DOI	Department of the Interior
FDR	Facility Design Report
FIR	Fabrication and Installation Report
NTL	Notice to Lessees and Operators
OCS	Outer Continental Shelf
OMB	Office of Management and Budget
USC	United States Code

## **BACKGROUND**

In the Energy Policy Act of 2005, Congress authorized the Secretary of the Interior (Secretary) to issue leases, easements, or rights-of-way on the Outer Continental Shelf (OCS) for activities that produce or support production, transportation, or transmission of energy from sources other than oil and gas. Pursuant to this authority, the Department of Interior (DOI) established a renewable energy program, promulgated final regulations implementing this program on April 29, 2009 (74 FR 19638), and recodified those regulations in 30 CFR part 585 on October 18, 2011 (76 FR 64432). On January 31, 2023, DOI published a final rule that reorganized 30 CFR part 585 to reflect the Secretary's delegation of authority for renewable energy oversight to BSEE. The final rule transferred certain renewable energy regulations to the newly codified 30 CFR part 285 (88 FR 6376). On May 15, 2024, DOI published a final rule to modernize the part 585 and 285 regulations (89 FR 42602).

## **Guidance Document Statement**

BSEE issues NTLs as guidance documents to clarify and provide more detail about certain BSEE regulatory requirements and to outline the information that is required by regulation that you provide in your various submittals. Accordingly, this NTL sets forth guidance that recommends a clear and consistent approach to submitting certain information required by the applicable regulations.

## **Paperwork Reduction Act of 1995 Statement**

The Office of Management and Budget (OMB) approved the information collection requirement contained in 30 CFR part 285 under OMB Control Numbers 1014-0034. This NTL does not impose additional information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq).

## **Contact**

If you have questions regarding this NTL, please contact the Office of Renewable Energy and Regulatory Compliance, 1849 C Street NW, Office 5429, Washington, DC 20240; or email: [bseeofficeofrenewableenergy@bsee.gov](mailto:bseeofficeofrenewableenergy@bsee.gov).

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Cheri Hunter, Director  
Renewable Energy Operations  
Bureau of Safety & Environmental Enforcement

## Appendix A

### Engineering Drawings and Reports

To facilitate BSEE’s review of required reports and submissions, the Lessee should compile, retain, and submit to BSEE the following drawings and documents within the recommended times, as specified below.

Drawing Type <sup>i</sup>	“Issued for Construction” Drawings <sup>ii</sup>	As-Built Drawings <sup>iii</sup>
Complete set of structural drawing(s), including major structural components and evacuation routes <sup>iv</sup>	To be included with the FDR submittal. Drawings should be stamped by a registered civil or structural <sup>v</sup> professional engineer.	By March 31st of each calendar year, for all structures installed the prior year and submitted annually until completion of installation.
Front, side, and plan view drawings <sup>vi</sup>	To be included with the FDR submittal. Drawings should be stamped by a registered civil or structural professional engineer.	N/A
Location plat for all Project facilities <sup>vii</sup>	To be included with the FDR submittal. Drawings should be stamped by a registered professional land surveyor. <sup>viii</sup>	By March 31st of each calendar year, for all facilities installed the prior year and updated annually until completion of installation. Drawings should be reviewed and stamped by a registered professional land surveyor.
Complete set of cable drawing(s) <sup>ix</sup>	To be included with the FDR submittal. Drawings should be stamped by a registered professional engineer.	Submit preliminary as-built reports quarterly for all facilities installed in the previous quarter. Submit final as-built reports within 6 months following installation of the export and inter-array cables.
Proposed Anchoring Plat <sup>x</sup>	To be included with the FDR submittal and provided to BSEE at least 120 days before anchoring activities.	N/A
As-placed Anchor Plats for all anchoring activities	N/A	90 days after completion of an activity or construction of a major facility component.
Piping and instrumentation diagram(s)	To be included with the FDR submittal. Drawings should be stamped by a registered professional engineer.	Submit quarterly for all facilities installed in the previous quarter.
Safety diagram(s) <sup>xi</sup>	To be included with the FDR submittal. Drawings should be stamped by a registered professional engineer.	Submit quarterly for all facilities installed in the previous quarter.
Electrical drawings, i.e., - Electrical one-line drawing(s) and Protective Relay Coordination Study/Diagram	To be included with the FDR submittal. Drawings should be stamped by a registered electrical professional engineer.	Submit quarterly for all facilities installed in the previous quarter.
Cause and Effect Chart	To be included with the FDR Submittal.	N/A
Schematics of fire and gas-detection system(s)	To be included with the FDR submittal. Drawings should be stamped by a registered professional engineer.	Submit quarterly for all facilities installed in the previous quarter.
Area classification diagrams	To be included with the FDR Submittal.	Submit quarterly for all facilities installed in the previous quarter.

## **Appendix A Continued Engineering Drawings and Reports**

Engineering drawings, as specified in the table above, and the associated engineering report(s) should be stamped by the appropriate licensed professional engineer or a professional land surveyor. BSEE considers stamping of these documents by such qualified entities to be important for ensuring that the design conforms to the requirements in 30 CFR 285.105(a) (as required by § 285.701(a)), including ensuring safety and preventing undue harm or damage to natural resources. Pursuant to 30 CFR 285.705(a), any changes to the approved design are subject to evaluation by BSEE to determine if you are required to use a certified verification agent (CVA) for any project modifications under 30 CFR 285.703(c). This applies from the submission dates of FDRs and FIRs through construction, commissioning, and operations. For modified systems, only the modifications need to be stamped by a licensed professional engineer(s) or a professional land surveyor. The professional engineer or land surveyor should be licensed in a State or Territory of the United States and have sufficient expertise and experience to perform the duties.

The Lessee should certify, in a letter accompanying the as-built drawings,<sup>xii</sup> that the as-built documents have been reviewed for compliance with the applicable FDR and FIR, that any differences between the as-built drawings and the IFC drawings do not impact the integrity of the facility, and that the as-built drawings accurately represent the as-installed facility. The letter should include a description of all differences between the as-built drawings and the IFC drawings that were submitted as part of the FDR and the as-built drawings. The drawings should be clearly marked “as-built.”

The engineer of record should submit a stamped report that they have reviewed the as-built design documents and the design documents do not make material changes from the IFC drawings and accurately represent the as-installed facility. This report should document differences between the IFC and as-built drawings and be submitted with the as-built drawings.

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<sup>i</sup> All engineering drawings and reports should be labeled with the lease, right-of-way grant, or right-of-use-easement grant number; area and block number(s); and as applicable, alphanumeric facility designation(s).

<sup>ii</sup> As required by 30 CFR 285.701(a)(4)

<sup>iii</sup> 30 CFR 285.712 requires the submission of final reports of activities, as well as interim reports as requested by BSEE. This column clarifies BSEE’s recommendations for the timing of such reports.

<sup>iv</sup> As required by 30 CFR 285.701(a)(4). BSEE considers inclusion of evacuation routes in these drawings to be important for ensuring that the design conforms to the requirements in 30 CFR 285.105(a) (as required by § 285.701(a)), including ensuring safety. This is applicable to the Wind Turbine Generators (WTG) and Offshore Substation (OSS).

<sup>v</sup> Structural stamp should be by a registered civil or structural engineer or equivalent, or a naval architect or marine engineer or equivalent, specializing in the design of offshore structures. BSEE considers stamping of these documents by such qualified entities to be important for ensuring that the design conforms to the requirements in 30 CFR 285.105(a) (as required by § 285.701(a)), including ensuring safety and prevention of undue harm or damage.

<sup>vi</sup> As required by 30 CFR 285.701(a)(3). This is applicable to the WTGs and OSS.

<sup>vii</sup> As required by 30 CFR 285.701(a)(2). This is applicable to all installed assets on the OCS, including scour

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protection, cables, WTG, and OSS.

<sup>viii</sup> Land surveyor stamp should be by a registered professional land surveyor or equivalent with experience surveying in the marine environment. BSEE considers stamping of these documents by such qualified entities to be important for ensuring that the design conforms to the requirements in 30 CFR 285.105(a) (as required by § 285.701(a)), including ensuring safety and prevention of undue harm or damage.

<sup>ix</sup> As required by 30 CFR 285.701(a)(4)(vi).

<sup>x</sup> As required by 30 CFR 285.701(a)(2) and (a)(4)(v).

<sup>xi</sup> Safety diagrams should depict the location of critical safety systems and equipment designed to prevent or ameliorate major accidents that could result in harm to health, safety, or the environment. This should include, but not be limited to, evacuation routes, station bill, fire/gas detectors, and firefighting equipment. BSEE considers inclusion of this information to be important for ensuring that the design conforms to the requirements in 30 CFR 285.105(a) (as required by § 285.701(a)), including ensuring safety.

<sup>xii</sup> As-built drawings should be a complete set of construction documents and should include all revisions to issued for construction drawings that were submitted with the FDR.