

Summary of the Detention Case 48-01-2026

I. General

Ground for detention

The ship was detained due to the following detainable deficiency:

04103 Emergency, lighting, batteries and switches - Emergency generator cooling system defective, radiator cooling fins wasted and leaking, no cooling liquid visible at the time of inspection.

Dispute

The flag State did not agree with the detention by the port State Authority and expressed views that:

1. The PSCO did not conduct an operational test of the emergency generator during the PSC inspection. Whereas the Recognized Organization and the Administration concur that the emergency generator's radiator was in need of attention, without an operational test, the decision to impose a code "30" seems a bit speculative in nature.
2. The Flag State Inspector and the RO surveyor in attendance conducted an extended operational test and noted no leaks or change to the fluid level within the emergency generator's radiator during the test. Considering these details, the Administration respectfully offers that a code "17" would be more appropriate for this deficiency than the code "30" which was issued.

Based on the above, the flag State requested that deficiency be revised to code "17" and that the PSC detention be removed from the vessel's Port State Inspection history.

The port State Authority is of the opinion that:

1. The detention decision was based on the condition of the emergency generator cooling system as directly observed by the PSCO at the time of inspection. The radiator exhibited extensive corrosion and wastage of cooling fins, structural degradation, restricted airflow, and visible coolant seepage. No cooling liquid was visible in the radiator at the time of inspection. It is highlighted that the defective nature of the radiator was clear to the PSCO upon entering the space and would have been clear to any crew (or the RO Surveyor).
2. These findings indicated a serious deterioration of a safety critical system and presented a credible risk of overheating and failure of the emergency generator under load. This is directly relevant to the requirements of SOLAS Chapter II 1, Regulation 43 for a reliable emergency source of power. In accordance with IMO Resolution A.1206(34) and the Tokyo MOU PSC procedures, a ship should be detained where deficiencies render the ship unsafe to proceed to sea or require verification of rectification prior to departure. The condition identified met these criteria, as the deficiency affected the reliability of an essential emergency system and required re-inspection.
3. The absence of an operational test does not invalidate the detention decision. PSC determinations may be based on visual condition and professional judgement where sufficient evidence exists that equipment is unreliable. Limited operational testing would not replicate full emergency conditions or demonstrate system integrity over sustained operation.

4. Subsequent testing by the Recognized Organisation does not alter the condition observed at the time of inspection. The RO confirmed the radiator was in poor condition and required replacement, and a Condition of Authority was issued pending repair.

5. The requirement for full replacement of radiator supports the conclusion that the deficiency was not minor but affected the integrity of the system. The review of the information by its Authority also identifies that when the testing was done by the RO, coolant had been returned to the system, re-enforcing the nature of the initial defect identified.

6. As the renewal survey had been conducted on 23 March 2026, 32 days before the PSC inspection, the detainable deficiency was assigned as RO responsible.

Based on the above, the detention was appropriate and correct.

II. Opinions of the panel

The panel members reviewed the relevant information and materials received. As the result of evaluation, panel members reached unanimous opinions as follows:

1. Although the master confirmed that all ship board equipment were in operational condition, it was clear, according to the objective evidences (photos taken by the PSCO at the time of inspection) that the emergency generator cooling system was in very poor condition, i.e. extensive radiator corrosion, wasted cooling fins, coolant leakage and insufficient coolant in the expansion tank. In accordance of 5.3 of Appendix 2 (GUIDELINES FOR THE DETENTION OF SHIPS) to "Procedures for Port State Control, 2025" (IMO Res. A.1206(34)), the failure of the proper operation of the EG is considered a detainable deficiency.

2. It is noted that the flag State claimed that it was considered inappropriate for the PSCO to detain the vessel without a functional test during the inspection. However, it was proved that conducting the functional test was unsafe with high chance of critical failure, taking account of the fact that the coolant temperature increased markedly after 10 minutes when the emergency generator underwent a no-load trial by the Chief Engineer with added coolant.

3. The abovementioned poor and unsafe condition had been considered confirmed by the RO with issuing the instruction of replacement of the radiator, which justified the judgement of the PSCO.

4. Since, by the time of PSCO's disembarkation, the Chief Engineer was unable to demonstrate normal operational condition of the equipment, it was necessary for the PSCO to return to the ship to confirm the rectification of the deficiency. And such situation was consistent with the criteria contained in 3.1.2 of Appendix 2 (GUIDELINES FOR THE DETENTION OF SHIPS) to "Procedures for Port State Control, 2025" (IMO Res. A.1206(34)).

5. Besides, it was noteworthy that, although the vessel completed a renewal survey by the RO roughly one month before this PSC inspection after a 2.5-month drydocking, the deficiency/condition observed by the PSCO in this case indicated the possible oversight on the part of the RO.

Based on the above, the detention decision is considered justified.

III. Conclusion

The panel members are of the unanimous opinion that the decision of detention was not justified. Therefore, the port State Authority would be asked to reconsider the decision of the detention.