

HITF INTERPRETATION

JUNE 2010 NO. 1

Document to be interpreted: NFPA 13, 1999 edition, 5-8.5.2.1; 2002 edition, 8.6.6; and 2002 edition, A.8.6.6.

Edition: 1999 and 2002

Background Information (optional): 18” Sprinkler Clearance

In a healthcare setting many organizations use perimeter walls for storing items. This storage is accomplished with the use of wire racks that may be free standing on the floor or have wheels so they can be moved to facilitate cleaning. Some AHJs are requiring that perimeter wall shelving be fastened to the wall. NFPA 13 (2002) A.8.6.6 states “shelving on a wall or shelving against”. The word against seems to imply a free standing unit set against the wall is permitted without fastening.

Question 1:

Is it required that perimeter wall shelving that extends to the ceiling be fastened to the wall?

Answer 1: NO

- a. Shelving isn't even required for the storage.
- b. There is no correlation between the shelving, the clearance and the need to secure any shelving.

HITF INTERPRETATION

JUNE 2010 NO. 2

Document to be interpreted: NFPA 101, 2000 edition, 4.5.3.1, 4.5.3.2.

Edition: 2000

Background Information (optional): Fire Pins in Fire Doors

In recent months, hospitals, during routine inspections have been presented inspection citations as a result of employing thermally fused pins in fire door assemblies with less-bottom-rod (LBR) exit devices. These citations are issued because the door will fail to operate as a means of egress, as defined by the Life Safety Code, when the thermally fused pins are activated.

Thermally fused fire pins have long been used in fire door assemblies when LBR exit devices are installed. The thermally fused fire pin is an integral part of the fire door assembly and without it, the assembly cannot be fire rated.

Thermal pins are activated only when their core temperature exceeds approximately 400 F, at which point temperatures on the fire side of the door assembly are in excess of 1200 F. At these temperatures there is no longer an egress requirement from the fire-side of any opening at these elevated temperatures.

Regardless of the use of a thermally fused pin, the door assembly will not function as a means for egress at these temperatures because the door will have expanded so forcefully into the frame it will not open. Secondly, there are additional thermal pins used in nearly every type of fire rated latching hardware, including the top latch of the very same LBR exit device your inspectors are rejecting.

The fire door assembly in a pathway of egress serves two purposes, a means for egress, and a fire barrier. We submit to you that when the fire barrier function of the assembly is required, the egress function is moot and irrelevant.

Question 1:

Are rated fire doors required to be operable after the door is exposed to a fire that is representative of the test conditions used to obtain the rating of the door?

Answer 1: NO

The HITF notes that a door that is exposed to these test conditions is no longer likely to be available as an egress path. (See 7.2.1.5.1 of NFPA 101 – 2000 edition).

In addition, the HITF notes the following:

- NFPA 252, *Standard Methods of Fire Tests of Door Assemblies*, 2008 Edition: Section 7.1.7.2 does not require the door hardware to be operable after the test.
- NFPA 101, 2012 edition (proposed) has a specific proposal that has been acted on to explicitly account for use of the thermal pins. See ROP proposal 101-75.

Although the 2000 edition did not explicitly consider the use of these devices, the proposed change for NFPA 101 is obviously considering and recognizing the use of these devices. For convenience, the text of the proposal is as follows:

7.2.1.5 Locks, Latches, and Alarm Devices.

7.2.1.5.1 Door leaves shall be arranged to be opened readily from the egress side whenever the building is occupied.

7.2.1.5.2* The requirement of 7.2.1.5.1 shall not apply to door leaves of listed fire door assemblies after exposure to elevated temperature in accordance with the listing based on laboratory fire test procedures.

7.2.1.5.3 Locks, if provided, shall not require the use of a key, a tool, or special knowledge or effort for operation from the egress side.

7.2.1.5.4 The requirements of 7.2.1.5.1 and 7.2.1.5.3 shall not apply where otherwise provided in Chapters 18 through 23.

A.7.2.1.5.2 Some fire door assemblies are listed for use with fire pins or fusible links that render the door leaf release inoperative upon exposure to elevated temperature during a fire. The door leaf release mechanism is made inoperative where conditions in the vicinity of the door opening become untenable for human occupancy and such door opening no longer provides a viable egress path.

(New proposed text is underlined)

HITF INTERPRETATION JUNE 2010 NO. 3

Document to be interpreted: NFPA 101, 2000 edition, 19.2.6.2.4

Edition: 2000

Background Information (optional): Exit Access From Suites

In many cases within a healthcare setting there are suites built and designed with stairwells within them. These stairwells provide similar or greater protection than exit access corridors. In some cases AHJs are enforcing travel distance limitations to “exit access corridors” even though there is a valid “exit” stairwell within the suite.

Question 1:

Is it the intent of 101 (2000-19.2.6.2.4) to require every sleeping suite to have access to an “Exit Access Corridor”?

Answer 1: YES

See NFPA 101: 19.2.5.1.1, Exception #3 concerning suites.

Question 2:

If the answer to question 1 is “yes”, is a stairwell within the suite allowed to be substituted as an “exit access corridor”?

Answer 2: NO

HITF INTERPRETATION JUNE 2010 NO. 4

Document to be interpreted: NFPA 101, 2000 edition, 19.1.2.1

Edition: 2000

Background Information (optional): Two Hour Floor/Ceiling

The issue includes a 2 hour rated floor/ceiling assembly being used to serve as an occupancy separator in a healthcare occupancy. Some jurisdictions (perhaps because of their state code provisions) apparently have been disallowing this type of assembly from being used as a proper barrier to provide the occupancy separation. The NFPA *Life Safety Code* has contained specific language allowing such assemblies to be used. This same subject was discussed as far back as 2004 by the HITF (November 16, 2004 Minutes) and given that the issue was so clear (and still is) in the *Life Safety Code*, an HITF position was not issued. Since this item continues to be problematic in some jurisdictions, the following response was issued.

Question 1:

May a 2-hour floor/ceiling assembly be used as the required membrane for occupancy separation as set forth in Section 19.1.2.1 of the 2000 edition of the Life Safety Code?

Answer 1: YES