

# MINUTES

## ***HEALTHCARE INTERPRETATIONS TASK FORCE***

**6 JUNE 2006**

**Orange County Convention Center**

**Room S210D**

**Orlando, FL**

1. The meeting was called to order at 1:05 PM
2. Introduction of members and guests present were completed:

Attendance included:

### **MEMBERS**

### **REPRESENTING**

#### **Principals**

Robert Solomon

NFPA (Chair)

Joe Bermes

IHS

Ken Bush

IFMA

Gene Cable

VA

Philip Hoge

DOD

David Klein

VA

Tom Jaeger

AHCA

George Mills

JCAHO

Dale Woodin

ASHE

Mayer Zimmerman

CMS

#### **Alternates**

Doug Erickson

ASHE

John Fishbeck

JCAHO

Greg Harrington

NFPA

Jim Merrill

CMS

Suresh Shah

IHS

Dick Strub

AHCA

**GUESTS**

**REPRESENTING**

Tim	Adams	ASHE
Chad	Beebe	Washington State Dept. of Health
Michael	Crowley	Rolf Jensen & Assoc.
David	Dagenais	Wentworth Douglass Hospital
Mike	Daniel	Daniel Consulting, LTD.
A. Richard	Fasano	Russell Phillips & Assoc.
Peter	Graham	Department of Veterans Affairs
Virgil	Hall	Department of Veterans Affairs
George	Johnston	Loma Linda University & Medical Center
Susan	McLaughlin	SBM Consultants
Richard	Nolen	HCR Manor Care Inc.
Dan	O'Connor	Schirmer Engineering Corp.
Phil	Thomas	Beverly Enterprises

3. The Minutes of the 7 June 2005 meeting were approved as submitted.
4. The agenda was approved as submitted. **See Enclosure 1.**
5. A number of issues were submitted in advance and several new items were brought up for discussion. A review of the items included the following:
  - A. **Blocking In Wall Cavities.** This item was submitted by JCAHO. The issue involves the acceptability of having an open wall cavity at the top of an assembly that is designed as part of smoke partition or wall designed to “resist the passage of smoke”. A series of questions addressing requirements in both new and existing healthcare occupancies were reviewed and issued. **See HITF Interpretation JUNE 2006 NO. 1.**
  - B. **Fire Doors in Chute Terminus Rooms.** This item was submitted by JCAHO. The issue involves the need to provide rated door openings at: the chute; the room enclosure; or both locations. A series of questions relating to the philosophy and intent of how the room and chute is to be protected with rated enclosures and doors were reviewed and issued. **See HITF Interpretation JUNE 2006 NO. 2.**

- C. **Allowable Gaps Around Corridor Doors.** This item was submitted by AHCA. The issue includes allowable gaps or clearances at corridor doors other than smoke barrier doors. Clearance for certain doors is necessary to make sure the door fully opens, properly closes and remains latched. After discussing the details associated with these various clearance issues, a Task Group was appointed to study the issue and report back at the next meeting. Task Group Members are:

David Klein – VA – Chair

Tom Jaeger – AHCA

Jim Merrill – CMS

George Mills – JCAHO

- D. **Incidental Air Movement/Make Up Air.** This item was submitted by AHCA. The issue involves the intent behind a Formal Interpretation issued on NFPA 90A (FI No. 90A -02-3) for the 2002 edition. The HITF agreed not to take any formal action on this request. The committee chair and staff liaison for NFPA 90A will be contacted to insure that the 50 CFM value referenced in the FI is not considered an absolute, maximum volume rate.
- E. **Application of NFPA 101A to Certain Exterior Spaces.** This item was submitted by AHCA. The issue involves how the FSES should be scored with regard to automatic sprinkler protection when certain exterior areas such as combustible overhangs, canopies or porches are not protected with automatic sprinklers. The application of the FSES when all other areas of the building are protected with automatic sprinklers needs to be clarified. The HITF agreed not to take any formal action on this request. The committee chair and staff liaison for NFPA 101A will be contacted to see if or how the scoring issue can be clarified.
- F. **Sprinkler Protection in Closets and Cabinets.** This item was submitted by the VA. The issue involves circumstances in which sprinkler protection can be exempted from closets, wardrobes and cabinets. There are no exceptions in NFPA 13 or NFPA 101 that allow omission of sprinklers in closets in a healthcare occupancy. As noted in the background information, a distinction between built-in closets and wardrobes (or similar furnishings) has normally been the demarcation point. In the request by the VA, one question posed concerned a

closet lined with a non-combustible lining. Another question involved things like fire extinguisher cabinets and hose cabinets. The HITF took no formal action on the questions. Instead, the submitter was advised to consider submitting proposals to the TC on Automatic Sprinklers for the next edition of NFPA 13. Current closet exceptions in NFPA 13 and NFPA 101 exclusively involve residential occupancies. Addressing areas like hose or fire extinguisher cabinets may result in creation of a laundry list of building items that may or may not require sprinklers.

- G. **Maintaining Previously Required Features in an Existing Building.** This item was submitted by the VA. Discussion and action on this item was deferred until the next meeting.
  
  - H. **Conduct of Fire Drills at Multiple Building Sites/Campus Configuration.** This item was submitted by the VA. The issue involves the extent and application of emergency drills in: Structures divided to meet criteria for separate buildings in accordance with the building code; or multiple, stand-alone buildings located in different locations or within a campus style environment. The HITF agreed that the emergency drills are intended to test knowledge of all employees in all buildings. A question relating to this comment was reviewed and issued. **See HITF Interpretation JUNE 2006 NO. 3.**
6. An Interim Report from the Door Locking Task Group (**See Enclosure 2**) was distributed. It will be discussed at the next meeting.
7. New Business:

ASHE is looking into the issue of aerosol propellant alcohol hand cleaner. Information previously distributed to the NFPA TC on Healthcare Occupancies that resulted in issuance of the TIA's and new text in NFPA 101 and NFPA 5000 was based on gel type materials. Aerosol based product is being more widely used and this form of the material needs to be reviewed to determine if other changes to NFPA 101 or NFPA 5000 are needed.

8. Old Business. The agenda item surrounding NFPA 90A was covered by Minute Item 5.D. The HITF was told that the proposal closing date for NFPA 90A was November 22, 2006.
  
9. Next Meeting. The HITF decided to have one more meeting before the end of 2006. The preference is to meet at/near CMS Headquarters in Baltimore, MD. Editors Note: Next meeting confirmed for December 8, 2006 at CMS Headquarters. The next meeting after that will be held in June 2007 in Boston during the 2007 NFPA WSCE.
  
10. The meeting adjourned at 4:10 pm.

Minutes prepared and submitted by Robert E. Solomon, PE, NFPA

**HITF INTERPRETATION JUNE 2006 NO. 1**

## HITF INTERPRETATION JUNE 2006 NO. 1

NFPA DOCUMENT NO: NFPA 101 2000 Edition

SUBJECT/BACKGROUND: Top of the wall blocking to protect the cavity in corridor walls.

Regarding barrier construction, some healthcare facilities would like to create corridor walls with open tops (drywall on two sides, no blocking to close the cavity of the smoke partition. In sprinklered buildings some healthcare facilities would like to create corridor walls that limit the transfer of smoke with drywall on two sides below the lay in ceiling, and either a) run one side to the deck above or b) stop both sides just above the ceiling, thus creating an opening on the occupied side, with no blocking to close the cavity of the corridor wall. Both of these design features could allow the products of combustion to enter the barrier cavity, compromising the integrity of the construction.

### QUESTIONS:

1. In a fully sprinklered new healthcare occupancy (18.3.6.2) with non-rated corridor walls is it acceptable to:
  - a. Have the wall constructed of noncombustible material that limits the transfer of smoke on both sides up to the lay-in ceiling or extend only one side to the deck above? **Both arrangements are permissible.**
  - b. Does a corridor wall constructed as mentioned in a) above need to be blocked at the top of the cavity to prevent products of combustion from entering the assembly? **No. This is not a required element.**
2. In a fully sprinklered existing healthcare occupancy (19.3.6.2.1, Exceptions 1, 2 & 3) with non-rated corridor walls, is it acceptable to:
  - a. Have the wall constructed of noncombustible material that limits the transfer of smoke on both sides up to the lay-in ceiling or extend only one side to the deck above? **Both arrangements are permissible.**
  - b. Does a corridor wall constructed as mentioned in a) above need to be blocked at the top of the cavity to prevent products of combustion from entering the assembly? **No. This is not a required element.**
3. Are penetrations such as waste lines, electrical back boxes, recessed equipment such as charting stations that enter the corridor side of the wall, required to be wrapped or blocked to prevent smoke from entering the corridor wall cavity? **No. There is no requirement to wrap or block such components but they must be trimmed to limit the transfer of smoke.**

**Specific example # 3:** Given a situation where a medical center is divided into several distinctly separated buildings, such as a mental health campus facility consisting of nine buildings connected by tunnels. The fire plan is specific to the building in alarm with the plan stating that available personnel from the neighboring two buildings respond to assist. The fire alarm system gives an automatic voice Code Red announcement throughout all nine buildings. Would 12 drills per year be sufficient for each group of three buildings? I believe YES. Campus wide would 36 drills per year meet the Code intent, 12 drills for each group of three? I believe YES.

**QUESTION:**

Is it the intent of the Code that twelve drills, once per quarter per shift, be conducted according to the extent of participation called for in the fire plan regardless of the configuration of the building? **Yes. The intent of conducting the drills is to expose staff in each building to the protocol. Drills should be initiated and rotated in different locations of each building to ensure broad participation in the drill, knowledge of the protocols to be followed and to verify that the staff members are adequately trained.**

**HITF INTERPRETATION JUNE 2006 NO. 2**

## **HITF INTERPRETATION JUNE 2006 NO. 2**

NFPA DOCUMENT NO: NFPA 82 1999 Edition

**SUBJECT/BACKGROUND:** A typical design in health care is for linen and waste chutes to terminate in a collection room. NFPA 82-1999 3-2.4 addresses chute loading doors (those doors on the upper floors where staff loads the chute). NFPA 82-1999 3-2.6 requires the chute to terminate in a rated room equivalent to the rating of the chute. The terminus room is to have automatic or self closing 1 ½ hour fire doors. The drawings in the code (Figure 3-2.5.1 Gravity Chute) indicate the need for a bottom terminal door that is self-closing and fire rated, although this is not stated in the body of the text.

### **QUESTIONS:**

1. Are both the chute terminal door at the bottom of the chute and the collection room access door required to be automatic or self closing 1 ½ hour fire doors? **Yes.**
2. If the collection room access door is an automatic or self closing 1 ½ hour fire door, will this suffice for protecting not only the chute but the collection room? If not, what is the philosophy and code reference for requiring both of these doors? **No. Protection of the chute terminus room (collection room) requires that protection be provided between the room itself and the shaft (hence the requirement for the rated chute door) and between the chute terminus room and surrounding or adjacent spaces (hence the requirement for the rated door at the opening). See NFPA 82, 1992 Edition, Sections 3-2.2.9 and 3-2.4.3 (NFPA 82, 2004 Edition, Sections 5.2.3.2 and 5.2.5.3.2).**

**HITF INTERPRETATION JUNE 2006 NO. 3**

### **HITF INTERPRETATION JUNE 2006 NO. 3**

NFPA DOCUMENT NO: NFPA 101 2000 and 2006 Editions

SUBJECT/BACKGROUND: HITF addressed a very similar question in May 15, 2001 Disneyland Hotel from NFPA staff, "NFPA Request - Frequency of fire drills at SNF". It apparently concerned a State agency and drill requirements at a SNF attached to a hospital. The HITF did not make a formal interpretation and the minutes went on to say, "Unless the state regulatory agency made some determination with respect to licensing that the SNF and healthcare facility were one in the same, the drills must be completed independent of each other."

A new situation is emerging where fire alarm systems, with their amazing micro processing capabilities, are designed to limit where the alarm is sounded. These options are taken in coordination with the fire plan.

For example, a large 7-story healthcare facility is separated by 2-hour fire barriers into three buildings, Russell, Hamblet, and Stevens. Where buildings are attached and the option is taken to sound an alarm signal only in the Hamblet building, what effect would that have on the fire drill requirement? For the facility, did we just go from 12 drills per year to 36? The telephone operator still makes the Code Red announcement heard in all three buildings and selected staff respond from all three buildings according to the fire plan, to the fire area.

NFPA 101 A.19.7.1.4 states, "the purpose of a fire drill is to test and evaluate the efficiency, knowledge, and response of institutional personnel in implementing the facility fire emergency plan." . . . "Fire drills should be scheduled on a random basis to ensure the personnel in health care facilities are drilled not less than once in a 3-month period."

JCAHO EC.5.30 (2006) states, "The organization conducts fire drills regularly." EP 1. "Fire drills are conducted quarterly on all shifts in each building defined by the LSC as the following: Ambulatory Health care occupancy, Health care occupancy, Residential occupancy." EP # 5 "Staff in all areas of every building where individuals are housed or treated participate in drills to the extent called for in the facility's fire plan." EP # 7 "The effectiveness of fire response training according to the fire plan is evaluated at least annually."

**Specific example # 1:** A health care facility consists of two buildings that abut each other but are separated by a 2-hour fire barrier. The fire plan calls for selected staff in building A to respond to the fire zone in building B. The fire alarm system activates only in Building B and a "Code Red" announcement is transmitted to both buildings according to the fire plan. Are a total of 12 drills per year sufficient, randomly conducted among the two buildings? I believe YES.

**Specific example # 2:** Given the same situation as example # 1 except the fire plan does not call for staff in "Building A" to take action for an alarm in Building B, the fire plan does NOT call for staff response from one "building" to another. The phone operator "Code Red" announcement is still transmitted to both buildings. Does the drill in building B count as a fire drill only for building B? I believe YES. Now 24 drills are required for the facility? I believe YES.

**ENCLOSURE 1**

**HEALTHCARE INTERPRETATIONS TASK FORCE**  
**AGENDA**  
**6 June 2006**  
**Orange County Convention Center**  
**S210 D**  
**Orlando, FL**  
**1:00 P.M. – 4:00 P.M.**

1. Call to order 1:00 PM.
2. Introduction of Members / Guests.
3. Review / Approval of June 2005 Minutes
4. Review of Questions (See Enclosure A)
  - A. JCAHO: Blocking at Top of Corridor Walls
  - B. JCAHO: Use of Rated Chute Doors
  - C. Other
5. Discussion Items
  - A. Clinical Needs and Lockout Doors
    - Task Group Update (T. Jaeger)
  - B. Other
6. New Business
  - ASHE Research on Aerosol ABHR Dispensers
7. Old Business
  - Corridor as Air Plenum Issue:
    - Discuss Proposal to NFPA 90A
    - NFPA 90A PCD is 17 November 2006
8. Date / Location for Next Meeting
9. Adjournment.

## **Enclosure A – JCAHO Issues/Discussion**

Two issues for discussion at HITF

Submitted by George Mills, Sr. Engineer, JCAHO

Issue 1: Top of the wall blocking to protect the cavity in corridor walls.

Regarding barrier construction, some healthcare facilities would like to create corridor walls with open tops (drywall on two sides, no blocking to close the cavity of the smoke partition). In sprinklered buildings some healthcare facilities would like to create corridor walls that limit the transfer of smoke with drywall on two sides below the lay in ceiling, and either a) run one side to the deck above or b) stop both sides just above the ceiling, thus creating an opening on the occupied side, with no blocking to close the cavity of the corridor wall. Both of these design features could allow the products of combustion to enter the barrier cavity, compromising the integrity of the construction.

Questions:

1. In a fully sprinklered new healthcare occupancy (18.3.6.2) with non-rated corridor walls is it acceptable to:
  - a. have the wall constructed of noncombustible material that limits the transfer of smoke on both sides up to the lay-in ceiling or extend only one side to the deck above?
  - b. Does a corridor wall constructed as mentioned in a) above need to be blocked at the top of the cavity to prevent products of combustion from entering the assembly?
2. In a fully sprinklered existing healthcare occupancy (19.3.6.2.1, Exceptions 1, 2 & 3) with non-rated corridor walls, is it acceptable to:
  - a. have the wall constructed of noncombustible material that limits the transfer of smoke on both sides up to the lay-in ceiling or extend only one side to the deck above?
  - b. Does a corridor wall constructed as mentioned in a) above need to be blocked at the top of the cavity to prevent products of combustion from entering the assembly?
3. Are penetrations such as waste lines, electrical back boxes, recessed equipment such as charting stations that enter one side of the wall, required to be wrapped or blocked to prevent smoke from entering the corridor wall cavity?

Issue 2: Fire doors for the terminus of chutes and for collection rooms.

A typical design in health care is for linen and waste chutes to terminate in a collection room. NFPA 82-1999 3-2.4 addresses chute loading doors (those doors on the upper floors where staff loads the chute). NFPA 82-1999 3-2.6 requires the chute to terminate in a rated room equivalent to the rating of the chute. The terminus room is to have automatic or self closing 1 ½ hour fire doors. The drawings in the code (Figure 3-2.5.1 Gravity Chute) indicate the need for a bottom terminal door that is self-closing and fire rated, although this is not stated in the body of the text.

Questions:

1. Are both the chute terminal door at the bottom of the chute and the collection room access door required to be automatic or self closing 1 ½ hour fire doors?
2. If the collection room access door is automatic or self closing 1 ½ hour fire door, will this suffice for protecting not only the chute but the collection room? If not, what is the philosophy and code reference for requiring both of these doors?

**Supplemental Agenda Items – #1 – American Health  
Care Association (AHCA)**

**JAEGER & ASSOCIATES, LLC**  
**11902 Holly Spring Drive**  
**Great Falls, Virginia 22066**

T (703)-433-5880  
F (703)-433-5888  
C (703)-674-6379  
[Tjaeger1@aol.com](mailto:Tjaeger1@aol.com)

To: Robert Solomon  
From Tom Jaeger  
Ref: Request for HITF Interpretations  
Date: May 23, 2006

Robert, I apologize for the delay in getting this request for interpretations to you and I appreciate your willingness to amend the HITF Meeting Agenda.

**Interpretation Request #1. 2000 *Life Safety Code***

**Issue:** Health care facilities on a national basis are being cited for deficient corridor doors by AHJ's if the gap between the sides or top of the door exceeds 1/8 inch. We are referring to corridor doors that are not part of a smoke barrier. Section 19-3.6.3.2 states that for corridor doors "Compliance with NFPA 80, *Standard for Fire Doors and Fire Windows* shall not be required." Section A19-3.6.3.1 states "Gasketing of doors should not be necessary to achieve resistance to the passage of smoke if the doors are relatively tight fitting."

The majority of existing health care facilities have solid core wood doors in the corridors, particularly to patient sleeping rooms, and these doors are usually 40" to 44" wide. Wide wood doors like those used in existing health care facilities will expand and contract due to changes in temperature and humidity and over time warp to some degree. It is not practical, particularly on the latch side of the door, to maintain a minimum of a 1/8 inch gap. If a 40" to 44" wood door was installed during a dry period with a 1/8 inch gap it may not close and latch when the humidity was high. An 1/8 inch gap is not sufficient clearance for proper operation of these doors.

We recognize that the Code does limit doors in smoke barriers to a maximum gap of 1/8 inch and requires doors in smoke barriers to maintain a higher level of smoke resistance than corridor doors. Section A8.3.1 states that smoke barriers and doors are required to "resist the passage of smoke", a higher level of protection than "relatively tight fitting."

No where in the Code does it state that the minimum gap for corridor doors is 1/8 inch and the Code specifically states that compliance with NFPA 80 is not required. We believe the AHJ's are incorrectly applying the 1/8 inch gap restriction for doors in smoke barriers to corridor doors that are not part of a smoke barrier.

**Question:** Does the 2000 *Life Safety Code* limit the gap between the sides or top of corridor doors and the door frame to 1/8 inch?

**Interpretation Request #2. 1999 NFPA 90A**

**Issue:** The Health Care Interpretation Task Force meet with representatives of the NFPA 90A Technical Committee in June 2005 to discuss the issue of corridor plenums and what constituted incidental air movement. It was agreed that make up air for typical bathroom exhaust fans would constitute incidental air movement and when the make up air for the bathroom exhaust system is supplied from the corridor, the corridor would not be classified as a plenum. The representatives from the NFPA 90A Technical Committee where very clear that although the Committee had discussed the issue of what constitutes incidental air movement, the Committee did not want to specify a CFM number in the standard. The representatives stated that what constitutes incidental air movement can vary from building to building depending on several factors such as the volume of the corridor.

The NFPA 90A Technical Committee recently issued a Formal Interpretation (FI-02-3) of the 2002 NFPA 90A, see attached, that basically stated that 50 CFM make up air from the corridor for a bathroom exhaust fan for a residents room complied with NFPA 90A and did not require that the corridor be considered a plenum. We agree with the interpretation, but want to insure that the 50 CFM number not be considered a maximum number for incidental air movement, but instead be considered to fall within the range of what is incidental air movement. We believe this is consistent with the discussions with the NFPA 90A representatives and no where in the FI does it state or infer that the 50CFM number is a maximum.

**Question:** Does the 50 CFM number in FI 90A-02-3 constitute a maximum number for incidental air movement in Section 2-3.11.1 of the 1999 edition of NFPA 90A?

**Interpretation Request #3: 2001 NFPA 101A**

**Issue:** Recently the American Health Care Association (AHCA) submitted a request for a Formal Interpretation for the 2001 NFPA 101A relative to Chapter 4 Fire Safety Evaluation System for Health Care Occupancies. Specifically, the FI request addressed whether outside pathways from the exit discharge to a public way was covered in Safety Parameter 10, Emergency Movement Routes. AHCA asked for the formal interpretation because nursing homes were being told that the FSES did not apply to these pathways, in part because they were outside the building. The Formal Interpretation issued by NFPA, see attached, clearly states that the FSES does apply to the pathways.

Nursing homes are now being told that the FSES does not apply and can not be used for the lack of sprinkler protection for outside overhangs greater than 4 feet in width, outside canopies, porches, etc. in an otherwise sprinklered building. That is, in a building where all corridors and habitable spaces are protected by sprinklers. In part, AHCA is being told that these unsprinklered spaces are outside the building and therefore the FSES does not apply

AHCA disagrees that the FSES does not apply. It is AHCA's position that the above situation is clearly addressed and applies in Safety Parameter 13, Automatic Sprinklers. It is the position of AHCA that the lack of sprinkler protection in these outside areas would result in the facility receiving 8 points in Parameter 13 instead of 10 points... AHCA believes the FSES is very clear on this issue.

**Question:** Is it the intent to permit NFPA 101A, Chapter 4, Fire Safety Evaluation System for Health Care Occupancies, Section 4.6.13.4.2 to be used to evaluate the level of safety for a health care occupancy that does not conform with the provisions of the 2000 NFPA 101, Section 19.3.5, such as that related to the lack of sprinkler protection of outside combustible overhangs, canopies, porches, etc?

# NFPA NEWS

## Comments Sought Proposed Tentative Interim Amendments

The following Tentative Interim Amendments (TIAs) have been proposed to the NFPA. They are being published for public review and comment. Comments should be filed with the Secretary, Standards Council, by the dates indicated below.

These proposed TIAs have also been forwarded to the responsible technical committees for processing. The technical committees will consider comments received by the date indicated below before final action is taken on the proposed TIAs. (Please identify the number of the TIA to which the comment is addressed.)

The Standards Council will then review the technical committees' ballot results, the public comments, and any other information that has been submitted to determine whether to issue the TIAs at its meeting on March 21–22, 2006. Anyone wishing to address the Council should contact Codes and Standards Administration.

A TIA is tentative because it has not been processed through the entire codes- and standards-making procedures. It is interim because it is effective only between editions of the document. A TIA automatically becomes a proposal of the proponent for the next edition of the document. As such, it then is subject to all of the procedures of the codes- and standards-making process.

### INSIDE NFPA NEWS

TIA Comments Sought	1
Motions Committee Report Available	3
2006 Annual Cycle ROC Available	3
Formal Interpretation Issued	5
Standards Council Minutes	8
Coming Events	8
Committees Soliciting Proposals	9

#### NFPA 59A, 2006

Standard for the Production, Storage, and Handling of Liquefied Natural Gas (LNG)

TIA Log No. 838R

Reference: 3.3.5.1, 3.3.5.3, 5.2.4, 5.2.5, 5.2.4.1, 5.2.6, 5.2.6.1, 5.2.6.2

Comment Closing Date: March 8, 2006

Submitter: Richard Hoffmann, Hoffmann & Feige

1. Revise 3.3.5.1 to read:

**3.3.5.1 Double Containment Container.** A single containment container surrounded by a wall (secondary container) and within 20 ft (6 m) of an opening to the atmosphere wall (secondary container) and that is designed to contain the entire volume of LNG released in the event of a spill from the primary or inner container, where the space between the inner container and the wall is open to the atmosphere.

2. Revise 3.3.5.3 to read:

**3.3.5.3 Full Containment Container.** A container in which the consisting of an inner (primary) container that is surrounded by a secondary (outer) container with a concrete or steel roof designed to contain LNG liquid in the event of a spill from the inner container and where the secondary container is enclosed by a steel or concrete roof designed such that excess vapor caused by a spill of LNG from the primary container will discharge through the pressure relief valves system.

3. Revise 5.2.4 to read:

**5.2.4 Container Spacing of Single Containment LNG Containers and Flammable Refrigerant Containers.**

5.2.4.1 The minimum separation distance between single containment LNG containers or tanks containing flammable refrigerants and exposures shall be in accordance with Table 5.2.4.1 or with the approval of the authority having jurisdiction at a shorter distance from buildings or walls constructed of concrete or masonry but at least 10 ft (3.0 m) from any building openings.

**5.2.5 Spacing of Double and Full Containment LNG Containers.**

5.2.5.2 Double and full containment containers with concrete secondary containers shall have a separation distance to limit the incident thermal radiation flux from a full tank liquid fire within the primary or secondary container of an adjacent tank as follows:

- (1) Steel wall and roofs: 47,000 4,700 Btu/ft<sup>2</sup>/hr (15,000 W/m<sup>2</sup>)
- (2) Concrete walls: 95,000 9,500 Btu/ft<sup>2</sup>/hr (30,000 W/m<sup>2</sup>)
  - (A) Unchanged
  - (B) Where a water spray or deluge system shall be permitted to

be is used to limit the thermal radiation flux onto the structure an adjacent container, the separation distance between containers shall be such that the radiation flux does not exceed the limits in 5.2.5, but in no event shall the separation distance be less than 1/2 the diameter of the largest tank be less than the distance specified in Table 5.2.4.1.

#### 5.2.6 Other Container Spacing Requirements

5.2.4.3 **5.2.6.1** A clear space of at least 3 ft (0.9 m) shall be provided for access to all isolation valves serving multiple containers.

5.2.4.4 **5.2.6.2** LNG containers of greater than 125 gal (0.5 m<sup>3</sup>) capacity shall not be located in buildings.

4. *Renumber following paragraphs accordingly.*

**Submitters Reason:** The definition of Double Containment Container is revised to clarify that the space between the inner and outer container is open to the atmosphere. The definition of Full Containment Container is revised editorially and to clarify that pressure relief systems other than pressure relief valves can be used on full containment containers.

Paragraph 5.2.4.2 is revised to separate it into paragraphs covering spacing of double containment LNG containers, full containment LNG containers, and other related subjects. Paragraph 5.2.4.2 contained a significant error in that required excessive inter-container separation distances. The values in 5.2.5 (1) and (2) are revised to correct an error in conversion from the metric units which were provided in the proposal.

**Emergency Nature:** This TIA corrects an error made in the revision of Chapter 5 for the 2006 edition. As written, the Code requires excessively large inter-container spacing distances, which have significant impact on the siting of these very large LNG containers (typically larger than 1,000,000 gallons), requiring more land, or potentially limiting the number of containers that can be located on a site. Both of these have significant economic impact on projects, and the economics of LNG imports, which are needed. As there are 31 LNG plants under consideration (FERC Data) in the U. S. and others in other countries, this TIA is needed and can not wait for the next revision cycle of NFPA 59A.

#### NFPA 90A–2002

#### *Standard for the Installation of Air-Conditioning and Ventilating Systems*

TIA Log No. 839

Reference: 5.4.7

Comment Closing Date: March 3, 2006

Submitter: Dale Woodin, American Society for Healthcare Engineering

1. *Revise 5.4.7 to read as follows:*

5.4.7 Maintenance. At least every four years the following maintenance shall be performed:

- (1) Fusible links (where applicable) shall be removed.
- (2) All dampers shall be operated to verify that they close fully.
- (3) The latch, if provided, shall be checked.
- (4) Moving parts shall be lubricated as necessary.

#### 5.4.7 Testing and Maintenance.

5.4.7.1 All newly installed or repaired dampers or where work on the duct system is performed within 6 ft of a damper, the damper shall be tested in accordance with Chapter 7 and 5.4.7.2(1) through (6) prior to being placed into service.

5.4.7.2 At least every four years, the following maintenance shall be performed.

- (1) Fusible links (where applicable) shall be removed.
- (2) All dampers shall be operated to verify that they close fully.
- (3) The latch, if provided, shall be checked for proper operation.
- (4) Moving parts shall be lubricated as necessary.
- (5) Fusible links (where applicable) shall be cleaned of any foreign matter, and reinstalled, or replaced with a new listed link of the same rating.

5.4.7.3 Dampers in health care occupancies as defined by NFPA 101 shall be tested at least every six years in accordance with 5.4.7.2(1) through (6).

5.4.7.4 When the damper manufacturer's literature indicates a more frequent maintenance and testing schedule, that schedule shall be followed.

5.4.7.5 Records shall be maintained on test results.

5.4.7.5.1 Records shall be available for inspection.

**Submitter's Reason:** The unfortunate part of the "return the entire report" decision of the Standards Council is that some extremely good work was lost in the process. The health care community was challenged by the proposal to modify the existing four-year damper-testing provision to annual testing. The American Society for Healthcare Engineering (ASHE) responded to this challenge by presenting evidence, obtained from hundreds of hospitals across the nation, disputing the need for annual testing. This evidence proved that annual testing was excessive and that routine testing could be extended beyond a four-year cycle without reducing the reliability of the dampers. The technical committee agreed and modified their own proposal to allow testing on a six-year cycle for health care occupancies. The unintended consequence of returning the entire report is the loss of this evidence-based improvement to 90A that will have a monumental positive impact on our health care system. By reverting to the previous edition, we have not gained the two additional years between testing our fire and smoke dampers. The effect of not publishing this final action will mean:

- Continued frequent disruption of patient occupied space(s) as we are a 24/7 occupancy and don't have the luxury of doing testing on off hours
- Potential increase in patient infections due to disturbing the particulate in the ductwork by closing the dampers
- Potential increase in patient infections by having to access concealed spaces and ceiling cavities
- Modification of essential pressure differentials by exercising dampers in critical spaces such as airborne infection isolation rooms, operating suites, laboratories, protective environments, etc.
- Wear and tear on the dampers being tested with the inevitable need to replace them if damaged during testing and the extended disruption of the space and the ventilation system, and
- A lost opportunity to reduce the regulatory burden on hospitals nationwide by over \$500 million through extending the testing cycle from once every four years to once every six years

With an estimated 5,000 patients in health care facilities dying on an annual basis due to the disruption of the physical environment, of which getting access above dropped ceilings and into access panels is a major contributor, the addition of two years to the existing four-year frequency would be a monumental advancement in preventing environmental-related infection in patients. Couple this with an estimated savings of a half-billion dollars that can be applied toward desperately needed staffing, new technology, and care of the indigent patient population, and you have a very compelling reason for adopting this TIA. Keep in mind, NFPA 90A TC members readily acknowledge previous comprehensive testing data did not exist and therefore the existing test frequency was nothing more than a “best guess” by the technical committee.

At the Standards Council appeal on NFPA 90A, each party addressing the Council made a statement about wanting to find a way to retain the modification to the paragraph; this is that opportunity.

## Standards Council News

### Now Available: *Report of the Motions Committee on Certified Amending Motions for Fall 2005 Revision Cycle Documents*

Under new rules that are now in effect, starting with the Fall 2005 Revision Cycle, only NFPA documents with Certified Amending Motions will be addressed at the next available NFPA Association Technical Meeting. The Notices of Intent to Make a Motion (NITMAM) were due November 10, 2005.

The Motions Committee Report on the Fall 2005 Revision Cycle Documents is now available by logging on to the NFPA website at <http://www.nfpa.org/assets/files/PDF/Standards%20Council/F05NITMAMReport.pdf>. These documents are scheduled for presentation at the 2006 Association Technical Meeting to be held on June 7-8, 2006 in Orlando, Florida.

Annual 2006 Revision Cycle Documents with Certified Amending Motions (NITMAMs due April 7, 2006) will be indicated in the “Report of the Motions Committee on Certified Amending Motions for Annual 2006 Revision Cycle Documents”, which is scheduled to be available no later than May 5, 2006 on the NFPA website. Documents with Certified Amending Motions from both the Fall 2005 and Annual 2006 Revision Cycles will be considered at the 2006 Association Technical Meeting on June 7-8, 2006 in Orlando, Florida.

For information on the Report of the Motions Committee, as well as the applicable rules (see Regulations Governing Committee Projects and the Technical Meeting Convention Rules) log on to [www.nfpa.org/codes/codesandstandards.asp](http://www.nfpa.org/codes/codesandstandards.asp).

## 2006 Annual Revision Cycle Report on Comments Available Soon

The 2006 Annual Revision Cycle *Report on Comments* will be available on February 24, 2006. It will contain a compilation of NFPA Technical Committee *Reports on Comments*.

To obtain a copy of the *Report on Comments* being presented for action, download the file from NFPA’s Web site at <http://www.nfpa.org/itemDetail.asp?categoryID=817&itemID=20929&URL> or complete and return the coupon below.

Under the new Regulations, the proposed NFPA Documents addressed in this *Report on Comments* (ROC) and in the *Report on Proposals* (ROP) will be presented for action at the June 2006 Annual Association Technical Meeting only when proper Amending Motions have been submitted.

Anyone wishing to make Amending Motions on the Technical Committee Reports (ROP and ROC) must signal their intention by submitting a Notice of Intent to Make a Motion by the deadline of April 7, 2006. Certified motions will be posted by May 5, 2006. Documents that receive notice of proper Amending Motions (Certified Amending Motions) will be presented for action at the Annual 2006 Association Technical Meeting. Documents that receive no motions will be forwarded directly to the Standards Council for action on issuance.

For more information on the new rules, see the inside front cover and for up-to-date information on schedules and deadlines for processing NFPA Documents, check the NFPA Web site at [www.nfpa.org](http://www.nfpa.org) or contact NFPA Standards Administration.

Listed below are documents that may have received comments and would, therefore, have reports appearing in the 2006 Annual Revision Cycle *Report on Comments* (ROC).

NFPA 13–2002	Standard for the Installation of Sprinkler Systems
NFPA 13D–2002	Standard for the Installation of Sprinkler Systems in One- and Two-Family Dwellings and Manufactured Homes
NFPA 13R–2002	Standard for the Installation of Sprinkler Systems in Residential Occupancies up to and Including Four Stories in Height
NFPA 15–2001	Standard for Water Spray Fixed Systems for Fire Protection
NFPA 20–2003	Standard for the Installation of Stationary Pumps for Fire Protection
NFPA 24–2002	Standard for the Installation of Private Fire Service Mains and Their Appurtenances and Repair Garages
NFPA 30A–2003	Code for Motor Fuel Dispensing Facilities and Repair Garages
NFPA 30B–2002	Code for the Manufacture and Storage of Aerosol Products
NFPA 32–2004	Standard for Drycleaning Plants
NFPA 33–2003	Standard for Spray Application Using Flammable or Combustible Materials
NFPA 34–2003	Standard for Dipping and Coating Processes Using Flammable or Combustible Liquids
NFPA 40–2001	Standard for the Storage and Handling of Cellulose Nitrate Film

NFPA 72–2002	National Fire Alarm Code®	NFPA 655–2001	Standard for Prevention of Sulfur Fires and Explosions
NFPA 77–2000	Recommended Practice on Static Electricity	NFPA 664–2002	Standard for the Prevention of Fires and Explosions in Wood Processing and Woodworking Facilities
NFPA 80–1999	Standard for Fire Doors and Fire Windows	NFPA 704–2001	Standard System for the Identification of the Hazards of Materials for Emergency Response
NFPA 80A–2001	Recommended Practice for Protection of Buildings from Exterior Fire Exposures	NFPA 853–2003	Standard for the Installation of Stationary Fuel Cell Power Systems
NFPA 86–2003	Standard for Ovens and Furnaces	NFPA 1081–2001	Standard for Industrial Fire Brigade Member Professional Qualifications
NFPA 88A–2002	Standard for Parking Structures	NFPA 1125–2001	Code for the Manufacture of Model Rocket and High Power Rocket Motors
NFPA 101A–2004	Guide on Alternative Approaches to Life Safety	NFPA 1142–2001	Standard on Water Supplies for Suburban and Rural Fire Fighting
NFPA 101B–2002	Code for Means of Egress for Buildings and Structures	NFPA 1221–2002	Standard for the Installation, Maintenance, and Use of Emergency Services Communications Systems
NFPA 105–2003	Standard for the Installation of Smoke Door Assemblies	NFPA 1500–2002	Standard on Fire Department Occupational Safety and Health Program
NFPA 130–2003	Standard for Fixed Guideway Transit and Passenger Rail Systems	NFPA 1582–2003	Standard on Comprehensive Occupational Medical Program for Fire Departments
NFPA 150–2000	Standard on Fire Safety in Racetrack Stables	NFPA 1971–2000	Standard on Protective Ensemble for Structural Fire Fighting
NFPA 232–2000	Standard for the Protection of Records	NFPA 1976–2000	Standard on Protective Ensemble for Proximity Fire Fighting
NFPA 257–2000	Standard on Fire Test for Window and Glass Block Assemblies	NFPA 2112–2001	Standard on Flame-Resistant Garments for Protection of Industrial Personnel Against Flash Fire
NFPA 258–2001	Recommended Practice for Determining Smoke Generation of Solid Materials	NFPA 2113–2001	Standard on Selection, Care, Use, and Maintenance of Flame-Resistant Garments for Protection of Industrial Personnel Against Flash Fire
NFPA 262–2002	Standard Method of Test for Flame Travel and Smoke of Wires and Cables for Use in Air-Handling Spaces		
NFPA 265–2002	Standard Methods of Fire Tests for Evaluating Room Fire Growth Contribution of Textile Coverings on Full Height Panels and Walls		
NFPA 268–2001	Standard Test Method for Determining Ignitibility of Exterior Wall Assemblies Using a Radiant Heat Energy Source		
NFPA 269–2000	Standard Test Method for Developing Toxic Potency Data for Use in Fire Hazard Modeling		
NFPA 287–2001	Standard Test Methods for Measurement of Flammability of Materials in Cleanrooms Using a Fire Propagation Apparatus (FPA)		
NFPA 288–2001	Standard Methods of Fire Tests of Floor Fire Door Assemblies Installed Horizontally in Fire Resistance-Rated Floor Systems		
NFPA 291–2002	Recommended Practice for Fire Flow Testing and Marking of Hydrants		
NFPA 407–2001	Standard for Aircraft Fuel Servicing		
NFPA 414–2001	Standard for Aircraft Rescue and Fire-Fighting Vehicles		
NFPA 556–P*	Guide for Identification and Development of Mitigation Strategies for Fire Hazard to Occupants of Passenger Road Vehicles		

**P\*** Proposed new document

Print and CD-ROM versions can be ordered by filling out the attached coupon and returning it to NFPA. Under the NFPA codes- and standards-making process, recipients of the *Report on Proposals* have a period of time in which to make comments on the *Report on Proposals*. This comment period ended September 2, 2005. The *Report on Comments* will contain all comments received on the *Report on Proposals*, together with the responses of the respective committees.

<b>Please send me:</b>		
_____ <b>2006 Annual Revision Cycle Report on Comments (ROC-2006AC)</b> (CD-ROM Version)		
_____ <b>2006 Annual Revision Cycle Report on Comments (ROC-2006AC)</b> (Print Version)		
NAME _____		
ADDRESS _____		
CITY _____	STATE _____	ZIP CODE _____
<b>Return the coupon to NFPA, Fulfillment Center, 11 Tracy Drive, Avon, MA 02322, or fax it to the Fulfillment Center at 617-770-0700.</b>		

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## Formal Interpretations Issued

The following Formal Interpretations have been issued. Copies of all FIs (if not published here) are available from Standards Administration, NFPA, 1 Batterymarch Park, Quincy, MA 02169-7471, or by calling 617-984-7248.

### NFPA 90A–2002

#### *Standard for the Installation of Air-Conditioning and Ventilating Systems*

Reference: 4.3.11.1, 3.3.5 and 3.3.21

FI No. 90A-02-3

**Question No. 1:** When the resident's room windows are closed, can the 50 cfm of air exhausted from the bathroom and drawn from the room in general be in whole or in part made up by infiltration through the NFPA 80 complying clearances around and under the corridor door due to the resultant pressure differences?

**Answer:** Yes.

**Question No. 2:** Does the corridor described constitute a plenum or air duct as these terms were intended to apply under 90A?

**Answer:** No.

### NFPA 90A–2002

#### *Standard for the Installation of Air-Conditioning and Ventilating Systems*

Reference: 5.3.4.5

FI No. 90A-02-02

**Question:** Is it the intent of NFPA 90A: 5.3.4.5 to prohibit the installation of a Type B vent, which is connected to and exhausts a natural gas fire boiler within an environmental air shaft?

**Answer:** Yes.

## Call for Members

The **Committee on Aircraft Maintenance Operations** is seeking members in all interest categories. This Committee is responsible for NFPA 410, *Standard on Aircraft Maintenance*.

The **Committee on Animal Housing Facilities** is seeking members in all interest categories. This Committee is responsible for NFPA 150, *Standard on Fire Safety in Racetrack Stables*.

The **Committee on Automatic Sprinklers – Foam-Water Sprinklers** is seeking members in the following interest categories: labor, enforcer, manufacturer, installer/maintainer, and consumer. This Committee is responsible for NFPA 16, *Standard for the Installation of Foam-Water Sprinkler and Foam-Water Spray Systems*.

The **Committee on Boiler Combustion System Hazards – Stoker Operations** is seeking members in all interest categories except manufacturers and users. This Committee is responsible for stoker material in NFPA 85, *Boiler and Combustion Systems Hazards Code*.

The **Committee on Compressed Natural Gas (CNG) Vehicular Fuel Systems Code** is seeking members in the interest category of enforcer. This Committee is responsible for NFPA 52, *Vehicular Fuel Systems Code*.

The **Committee on Carbon Monoxide Detection** is seeking members in all interest categories except manufacturers and users. This Committee is responsible for NFPA 720, *Standard for the Installation of Carbon Monoxide (CO) Warning Equipment in Dwelling Units*.

The **Committee on Chimneys, Fireplaces, and Venting Systems for Heat-Producing Appliances** is seeking members in the interest categories of installer/maintainer, enforcing authority, and consumer. This Committee is responsible for NFPA 211, *Standard for Chimneys, Fireplaces, Vents, and Solid Fuel-Burning Appliances*.

The **Committee on Electrical Equipment of Industrial Machinery** is seeking members in all interest categories except users or manufacturers. This Committee is responsible for NFPA 79, *Electrical Standard for Industrial Machinery*.

The **Committee on Electrical Systems Maintenance** is seeking members in all interest categories except special experts. This Committee is responsible for NFPA 73, *Electrical Inspection Code for Existing Dwellings*.

The **Committee on Electronic Safety Equipment for Fire and Emergency Services** is seeking members in all interest categories. This Committee is responsible for NFPA 1982, *Standard on Personal Alert Safety Systems (PASS)*.

The **Committee on Emergency Vehicle Mechanic Technicians Professional Qualifications** is seeking members in all interest categories. This Committee is responsible for NFPA 1071, *Standard for Emergency Vehicle Technician Professional Qualifications*.

The **Committee on Exposure Fire Protection** is seeking members in all interest categories except manufacturers. This Committee is responsible for NFPA 80A, *Recommended Practice for Protection of Buildings from Exterior Fire Exposures*.

The **Committee on Fine Aerosol Extinguishing Technology** is seeking members in all interest categories except special experts.

The **Committee on Fire Department Ground Ladders** is seeking members in all interest categories except manufacturers. This Committee is responsible for NFPA 1931, *Standard for Manufacturer's Design of Fire Department Ground Ladders*; and NFPA 1932, *Standard on Use, Maintenance, and Service Testing of In-Service Fire Department Ground Ladders*.

The **Committee on Fire Marshal Professional Qualifications** is seeking members in all interest categories except users (fire marshals).

The **Committee on Fire Service Instructor Professional Qualifications** is seeking members in all interest categories except enforcers, special experts, and users. This Committee is responsible for NFPA 1041, *Standard for Fire Service Instructor Professional Qualifications*.

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The **Flammable Liquids Code Fundamentals Committee** is seeking members in all interest categories except manufacturers, special experts, and insurance. This Committee is responsible for chapters in NFPA 30, *Flammable and Combustible Liquids Code*.

The **Committee on Fluidized Bed Boilers** is seeking members in all interest categories except manufacturer. This Committee is responsible for chapters in NFPA 85, *Boiler and Combustion Systems Hazards Code*.

The **Committee on Fundamentals of Combustion Systems Hazards** is seeking members in all interest categories except manufacturer. This Committee is responsible for chapters in NFPA 85, *Boiler and Combustion Systems Hazards Code*.

The **Committee on Garages and Parking Structures** is seeking members in all interest categories except manufacturer, special experts, and users. This Committee is responsible for NFPA 88A, *Standard for Parking Structures*.

The **Committee on Handling and Conveying of Dusts, Vapors, and Gases** is seeking members in all interest categories except special experts. This Committee is responsible for NFPA 91, *Standard for Exhaust Systems for Air Conveying of Vapors, Gases, Mists, and Noncombustible Particulate Solids*; NFPA 654, *Standard for the Prevention of Fire and Dust Explosions from the Manufacturing, Processing, and Handling of Combustible Particulate Solids*; and NFPA 655, *Standard for Prevention of Sulfur Fires and Explosions*.

The **Committee on Hazard and Risk of Contents and Furnishings** is seeking members in the interest categories of consumer, insurance, fire service, education, and special interest in vehicular furnishings. This Committee is responsible for NFPA 555, *Guide on Methods for Evaluating Potential for Room Flashover*; and proposed NFPA 556, *Guide for the Identification and Development of Mitigation Strategies for Fire Hazard to Occupants of Passenger Road Vehicles*.

The **Committee on Health Care Facilities – Administration** is seeking members in all interest categories except special experts. This Committee is responsible for chapters in NFPA 99, *Standard for Health Care Facilities*.

The **Committee on Health Care Facilities – Electrical Equipment** is seeking members in all interest categories except users. This Committee is responsible for chapters in NFPA 99, *Standard for Health Care Facilities*.

The **Committee on Health Care Facilities – Electrical Systems** is seeking members in all interest categories except special experts and users. This Committee is responsible for chapters in NFPA 99, *Standard for Health Care Facilities*.

The **Committee on Health Care Facilities – Gas Delivery Equipment** is seeking members in all interest categories except users. This Committee is responsible for chapters in NFPA 99, *Standard for Health Care Facilities*.

The **Committee on Health Care Facilities – Health Care Emergency Management** is seeking members in all interest categories except users, enforcers, and special experts. This Committee is responsible for chapters in NFPA 99, *Standard for Health Care Facilities*.

The **Committee on Health Care Facilities – Hyperbaric and Hypobaric Facilities** is seeking members in all interest categories except users and manufacturers. This Committee is responsible for chapters in NFPA 99, *Standard for Health Care Facilities*.

The **Committee on Health Care Facilities – Laboratories** is seeking members in all interest categories except users. This Committee is responsible for chapters in NFPA 99, *Standard for Health Care Facilities*.

The **Committee on Incident Management Professional Qualifications** is seeking members in all interest categories.

The **Committee on Incinerators and Waste Handling Systems** is seeking members in all interest categories except manufacturer. This Committee is responsible for NFPA 82, *Standard on Incinerators and Waste and Linen Handling Systems and Equipment*.

The **Committee on Industrial and Medical Gases** is seeking members in the enforcer category only. This Committee is responsible for NFPA 51, *Standard for the Design and Installation of Oxygen–Fuel Gas Systems for Welding, Cutting, and Allied Processes*; NFPA 51A, *Standard for Acetylene Cylinder Charging Plants*; NFPA 55, *Standard for the Storage, Use, and Handling of Compressed Gases and Cryogenic Fluids in Portable and Stationary Containers, Cylinders, and Tanks*; and NFPA 560, *Standard for the Storage, Handling, and Use of Ethylene Oxide for Sterilization and Fumigation*.

The **Committee on Internal Combustion Engines** is seeking members in the following interest categories: enforcer and user. This Committee is responsible for NFPA 37, *Standard for the Installation and Use of Stationary Combustion Engines and Gas Turbines*.

The **Committee on Liquid Fuel Burning Equipment** is seeking members in the interest categories of insurance and user. This Committee is responsible for NFPA 31, *Standard for the Installation of Oil-Burning Equipment*.

The **Committee on LP-Gases at Utility Gas Plants** is seeking members in all interest categories except special experts. This Committee is responsible for NFPA 59, *Utility LP-Gas Plant Code*.

The **Technical Correlating Committee on Manufactured Homes** is seeking members in the interest categories of consumer, users, installation/maintenance, and insurance. This Committee has jurisdiction over NFPA 501, *Standard on Manufactured Housing*; NFPA 501A, *Standard for Fire Safety Criteria for Manufactured Home Installations, Sites, and Communities*; and NFPA 225, *Model Manufactured Home Installation Standard*.

The **Committee on Electrical Systems for Manufactured Housing** is seeking members in all interest categories except manufacturer and enforcer. This Committee is responsible for chapters in the following documents: NFPA 501, *Standard on Manufactured Housing*; NFPA 501A, *Standard for Fire Safety Criteria for Manufactured Home Installations, Sites, and Communities*; and NFPA 225, *Model Manufactured Home Installation Standard*.

The **Committee on Fire Safety Systems for Manufactured Housing** is seeking members in the interest categories of insurance, consumer, and research and testing. This Committee is

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responsible for chapters in the following documents: NFPA 501, *Standard on Manufactured Housing*; NFPA 501A, *Standard for Fire Safety Criteria for Manufactured Home Installations, Sites, and Communities*; and NFPA 225, *Model Manufactured Home Installation Standard*.

The **Committee on Mechanical Systems for Manufactured Housing** is seeking members in all interest categories except manufacturers. This Committee is responsible for chapters in the following documents: NFPA 501, *Standard on Manufactured Housing*; NFPA 501A, *Standard for Fire Safety Criteria for Manufactured Home Installations, Sites, and Communities*; and NFPA 225, *Model Manufactured Home Installation Standard*.

The **Committee on Plumbing Systems for Manufactured Housing** is seeking members in all interest categories except enforcers. This Committee is responsible for chapters in the following documents: NFPA 501, *Standard on Manufactured Housing*; NFPA 501A, *Standard for Fire Safety Criteria for Manufactured Home Installations, Sites, and Communities*; and NFPA 225, *Model Manufactured Home Installation Standard*.

The **Committee on Public Safety Telecommunicator Professional Qualifications** is seeking members in all interest categories. The Committee is responsible for NFPA 1061, *Standard for Professional Qualifications for Public Safety Telecommunicator*.

The **Committee on Manufacture of Organic Coatings** is seeking members in the interest categories of enforcer and insurance. This Committee is responsible for NFPA 35, *Standard for the Manufacture of Organic Coatings*.

The **Committee on Marine Fire-Fighting Vessels** is seeking new members in all interest categories except enforcing authorities. This Committee is particularly interested in acquiring members with expertise in naval architecture and marine engine manufacture and installation. This Committee is responsible for NFPA 1925, *Standard on Marine Fire-Fighting Vessels*.

The **Committee on Marine Terminals** is seeking new members in all interest categories except special interest. This Committee is responsible for NFPA 307, *Standard for the Construction and Fire Protection of Marine Terminals, Piers, and Wharves*.

The **Committee on Mining Facilities** is seeking new members in the user category, specifically the metal mining industry. This Committee is responsible for NFPA 120, *Standard for Fire Prevention and Control in Coal Mines*; and NFPA 122, *Standard for Fire Prevention and Control in Metal/Nonmetal Mining and Metal Mineral Processing Facilities*.

The **Committee on Public Emergency Service Communication** is seeking members for the installer/maintainer category. This Committee is responsible for NFPA 1221, *Standard for the Installation, Maintenance, and Use of Emergency Services Communications Systems*.

The **Committee on Public Fire Educator Professional Qualifications** is seeking members in all interest categories except labor and user. This Committee is responsible for NFPA 1035, *Standard for Professional Qualifications for Public Fire and Life Safety Educator*.

The **Committee on Public Fire Reporting Systems** is seeking members in all categories except manufacturers. This Committee is responsible for chapters in NFPA 72®, *National Fire Alarm Code*®.

The **Committee on Pulverized Fuel Systems** is seeking members in all interest categories except manufacturer and users. This Committee is responsible for chapters in NFPA 85, *Boiler and Combustion Systems Hazards Code*.

The **Committee on Single Burner Boilers** is seeking members in all interest categories except manufacturer. This Committee is responsible for chapters in NFPA 85, *Boiler and Combustion Systems Hazards Code*.

The **Committee on Solvent Extraction Plants** is seeking members in the interest categories of equipment manufacturer, user, and enforcers. This Committee is responsible for NFPA 36, *Standard for Solvent Extraction Plants*.

The **Committee on Static Electricity** is seeking members in the following categories: enforcer, insurance, and research/testing. This Committee is responsible for NFPA 77, *Recommended Practice on Static Electricity*.

The **Committee on Tank Leakage and Repair Safeguards** is seeking members in the following interest categories: equipment manufacturers, installer/maintainer, and insurance. This Committee is responsible for NFPA 326, *Standard for the Safeguarding of Tanks and Containers for Entry, Cleaning, or Repair*; and NFPA 329, *Recommended Practice for Handling Releases of Flammable and Combustible Liquids and Gases*.

The **Committee on Transportation of Flammable Liquids** is seeking members in all interest categories. This Committee is responsible for NFPA 385, *Standard for Tank Vehicles for Flammable and Combustible Liquids*.

The **Committee on Wastewater Treatment Plants** is seeking members in all interest categories except manufacturer and special experts. This Committee is responsible for NFPA 820, *Standard for Fire Protection in Wastewater Treatment and Collection Facilities*.

The **Committee on Water Additives for Fire Control and Vapor Mitigation** is seeking members in the categories of user and enforcer. This Committee is responsible for NFPA 18, *Standard on Wetting Agents*.

The **Committee on Water-Cooling Towers** is seeking members in all interest categories except insurance. This Committee is responsible for NFPA 214, *Standard on Water-Cooling Towers*.

The **Committee on Water Spray Fixed Systems** is seeking members in the enforcing authority interest category. This Committee is responsible for NFPA 15, *Standard for Water Spray Fixed Systems for Fire Protection*.

The **Committee on Wildfire Suppression Professional Qualifications** is seeking members in all categories. This Committee is responsible for NFPA 1051, *Standard for Wildland Fire Fighter Professional Qualifications*.

Anyone interested in serving on one of these committees or on any NFPA technical committee can download a form from NFPA's Web site at <http://www.nfpa.org/assets/files/PDF/TCApp.pdf> or request a technical committee application form from Codes and Standards Administration, NFPA, 1 Batterymarch Park, Quincy, MA 02169-7471.

## Minutes Available

The NFPA Standards Council met October 27, 2005. The minutes are posted on NFPA's Web site at <http://www.nfpa.org/category/List.asp?categoryID=835&URL>. A copy of the minutes of this meeting can also be obtained by writing to Codes and Standards Administration, NFPA, 1 Batterymarch Park, Quincy, MA 02169-7471.

## Coming Events Committee Calendar

### February

- 7–8 Hazard and Risk of Contents and Furnishings, San Antonio, TX
- 7–9 Explosion Protection Systems, Las Vegas, NV
- 7–10 Fire Investigations, Mesa, AZ
- 8–10 Lightning Protection, Orlando, FL
- 8–10 Road Tunnel and Highway Fire Protection, Miami, FL
- 9–10 Agricultural Dusts, Scottsdale, AZ
- 9–11 Fire Service Occupational Safety and Health, Los Angeles, CA
- 12–14 Pyrotechnics, Pittsburgh, PA
- 14–15 Airport Facilities, Miami, FL
- 16–17 Incident Management Professional Qualifications, San Antonio, TX
- 16–18 Forest and Rural Fire Protection, Nashville, TN
- 21–23 Hazardous Chemicals, Baltimore, MD
- 22–24 Aircraft Rescue and Fire Fighting, N. Redington Beach, FL
- 28-
- March 1 Emergency Medical Services Protective Clothing and Equipment, Raleigh, NC

### March

- 3–4 Fire Inspector Professional Qualifications, Orlando, FL
- 9–10 Boiler Combustion System Hazards – Fundamentals, Orlando, FL
- 10–11 Rescue Technician Professional Qualifications, San Antonio, TX
- 12–14 Electronic Safety Equipment, Oklahoma City, OK
- 20 Boiler Combustion System Hazards – Single Burner Boilers, Tampa, FL
- 20–22 Hazardous Materials Response Personnel, Phoenix, AZ
- 21–22 Boiler Combustion System Hazards – Multiple Burner Boilers, Tampa, FL
- 21–22 NFPA Standards Council Meeting, Tampa, FL
- 21–23 Disaster/Emergency Management, Vancouver, British Columbia

- 23 TG Fire Service Occupational Safety and Health, Washington, DC
- 23–24 Boiler Combustion System Hazards – Heat Recovery Steam Generators, Tampa, FL
- 27–28 Liquefied Petroleum Gas Code, Albuquerque, NM
- 29–30 Utility LP-Gas Plant Code, Albuquerque, NM
- 30 Mining Facilities, St. Louis, MO

### April

- 3–5 Telecommunications, Boulder, CO
- 5–7 Electronic Computer Systems, Boulder, CO
- 11–12 Safety at Motorsports Venues, Phoenix, AZ
- 24–28 NEC TCC Meeting, Singer Island, FL
- 30–
- May 1 Fire Service Training, Indianapolis, IN

### May

- 22–23 Cultural Resources, Ljubljana, Slovenia

### June

- 4–8 NFPA World Safety Conference and Exposition, Orlando, FL
- 14–15 TCC Boiler Combustion System Hazards, FM Global, Norwood, MA

# Committees Soliciting Proposals

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Governing Committee Projects, committees are now accepting proposals for recommendations on content for the documents listed below. Proposals received by 5:00 p.m. ET on the closing date indicated will be acted on by the committee, and that action will be published in the committee's report. Proposals must be submitted to Codes and Standards Administration on proposal forms available in the back of all NFPA documents or from NFPA headquarters. (NOTE: For information on specific committee meeting dates, contact Codes and Standards Administration, NFPA.) Copies of **new document** drafts are available from Codes and Standards Administration, NFPA, One Batterymarch Park, Quincy, MA 02169-7471, or they may be downloaded from NFPA's Web site at <http://www.nfpa.org/itemDetail.asp?categoryID=163&itemID=19006>. If you need a current edition of a document, please contact NFPA, Fulfillment Center, 11 Tracy Drive, Avon, MA 02322, or call 800-344-3555.

Document No./ Edition	Title	Proposal Closing Date	Meeting Reporting
NFPA 17–2002	Standard for Dry Chemical Extinguishing Systems	5/26/2006	F2007
NFPA 17A–2002	Standard for Wet Chemical Extinguishing Systems	5/26/2006	F2007
NFPA 22–2003	Standard for Water Tanks for Private Fire Protection	5/26/2006	F2007
†NFPA 42–2002	Code for the Storage of Pyroxylin Plastic	5/26/2006	F2007
NFPA 36–2004	Standard for Solvent Extraction Plants	5/26/2006	F2007
†NFPA 55–2005	Standard for the Storage, Use, and Handling of Compressed Gases and Cryogenic Fluids in Portable and Stationary Containers, Cylinders, and Tanks	5/25/2007	F2008
NFPA 59–2004	Utility LP-Gas Plant Code	3/3/2006	F2007
NFPA 70E–2004	Standard for Electrical Safety in the Workplace	9/15/2006	A2008
NFPA 75–2003	Standard for the Protection of Information Technology Equipment	3/1/2006	F2007
NFPA 76–2005	Standard for the Fire Protection of Telecommunications Facilities	3/1/2006	F2007
NFPA 92A–2006	Standard for Smoke-Control Systems Utilizing Barriers and Pressure Differences	11/22/2006	A2008
†NFPA 92B–2005	Standard for Smoke Management Systems in Malls, Atria, and Large Spaces	11/22/2006	A2008
NFPA 101–2006	Life Safety Code®	8/25/2006	A2008
NFPA 115–2003	Standard for Laser Fire Protection	5/26/2006	F2007
NFPA 140–2004	Standard on Motion Picture and Television Production Studio Soundstages and Approved Production Facilities	5/26/2006	F2007
NFPA 306–2003	Standard for the Control of Gas Hazards on Vessels	11/22/2006	A2008
†NFPA 400–P*	Hazardous Chemical Code	5/26/2006	F2007
†NFPA 430–2004	Code for the Storage of Liquid and Solid Oxidizers	5/26/2006	F2007
†NFPA 432–2002	Code for the Storage of Organic Peroxide Formulations	5/26/2006	F2007
†NFPA 434–2002	Code for the Storage of Pesticides	5/26/2006	F2007
NFPA 450–2004	Guide for Emergency Medical Services and Systems	11/22/2006	A2008
†NFPA 490–2002	Code for the Storage of Ammonium Nitrate	5/26/2006	F2007
NFPA 496–2003	Standard for Purged and Pressurized Enclosures for Electrical Equipment	5/26/2006	F2007
NFPA 497–2004	Recommended Practice for the Classification of Flammable Liquids, Gases, or Vapors and of Hazardous (Classified) Locations for Electrical Installations in Chemical Process Areas	5/26/2006	F2007
NFPA 499–2004	Recommended Practice for the Classification of Combustible Dusts and of Hazardous (Classified) Locations for Electrical Installations in Chemical Process Areas	5/26/2006	F2007
NFPA 730–2006	Guide for Premises Security	5/26/2006	F2007
NFPA 731–2006	Standard for the Installation of Electronic Premises Security Systems	5/26/2006	F2007
NFPA 801–2003	Standard for Fire Protection for Facilities Handling Radioactive Materials	5/26/2006	F2007
NFPA 806–P*	Performance-Based Standard for Fire Protection for Advanced Nuclear Reactor Electric Generating Plants	5/26/2006	F2007
NFPA 909–2005	Code for the Protection of Cultural Resource Properties – Museums, Libraries, and Places of Worship	5/26/2006	F2007
NFPA 921–2004	Guide for Fire and Explosion Investigations	5/26/2006	F2007
NFPA 1006–2003	Standard for Rescue Technician Professional Qualifications	5/26/2006	F2007
NFPA 1192–2005	Standard on Recreational Vehicles	5/26/2006	F2007
NFPA 1194–2005	Standard for Recreational Vehicle Parks and Campgrounds	5/26/2006	F2007
†NFPA 1561–2005	Standard on Emergency Services Incident Management System	5/26/2006	F2007
NFPA 1584–2003	Recommended Practice on the Rehabilitation of Members Operating at Incident Scene Operations and Training Exercises	5/26/2006	F2007
NFPA 1670–2004	Standard on Operations and Training for Technical Search and Rescue Incidents	5/25/2007	F2008

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NFPA 1901–2003	Standard for Automotive Fire Apparatus	3/10/2006	F2007
NFPA 1925–2004	Standard on Marine Fire-Fighting Vessels	5/26/2006	F2007
NFPA 1962–2003	Standard for the Inspection, Care, and Use of Fire Hose, Couplings, and Nozzles and the Service Testing of Fire Hose	3/10/2006	F2007
NFPA 1963–2003	Standard for Fire Hose Connections	3/16/2007	F2008
NFPA 1964–2003	Standard for Spray Nozzles	3/10/2006	F2007
NFPA 1965–2003	Standard for Fire Hose Appliances	3/16/2007	F2008
NFPA 5000–2006	Building Construction and Safety Code®	8/25/2006	A2008

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**P\*** Proposed New NFPA Document

† Change in proposal closing date or cycle

## Extract from 1999 NFPA 90A

### 2-3.11 Corridor Air Systems.

#### 2-3.11.1\* Egress Corridors.

Egress corridors in health care, detention and correctional, and residential occupancies shall not be used as a portion of a supply, return, or exhaust air system serving adjoining areas. An air transfer opening(s) shall not be permitted in walls or in doors separating egress corridors from adjoining areas.

Exception No. 1: Toilet rooms, bathrooms, shower rooms, sink closets, and similar auxiliary spaces opening directly onto the egress corridor.

Exception No. 2: Where door clearances do not exceed those specified for fire doors in NFPA 80, Standard for Fire Doors and Fire Windows, air transfer caused by pressure differentials shall be permitted.

Exception No. 3: Use of egress corridors as part of an engineered smoke-control system.

Exception No. 4: In detention and correctional occupancies with corridor separations of open construction (e.g., grating doors or grating partitions).

#### A-2-3.11.1

This requirement is not intended to prohibit the use of mechanical ventilation for corridors or prohibit the use of a corridor as a source of makeup air through normal leakage around doors due to pressure differentials created by exhaust fans in kitchens and bathrooms. This requirement is not intended to prohibit incidental air movement between rooms and corridors because of pressure differentials in special institutional occupancies. In such cases, the direction of airflow is not the important issue. For the purpose of fire protection, the important criterion is that the air transfer be incidental.

# Formal Interpretation

## NFPA 101A

### Guide on Alternative Approaches to Life Safety

#### 2001 Edition

**Reference: 4.6.10.3.2**

**F.I. No. 101A-01-1**

**BACKGROUND:** I am representing the American Health Care Association (AHCA) which is a trade association representing over 12,000 nursing homes. The 2000 Life Safety Code has been adopted by the Federal Government and applies to all existing nursing homes in the U.S. The 2001 NFPA 101A is the applicable edition for the 2000 LSC and is widely used by existing nursing homes as an alternative to determine equivalent compliance with the prescriptive requirements of the Code. CMS has recently issued a memorandum stating that the use of FSES is inappropriate relative to pathways, particularly hard surface pathways as part of the “discharge from exits” as covered in Section 7.7 of the Code. The American Health Care Association disagrees with CMS’s position and had participated in many discussions with CMS on this very issue prior to CMS’s memorandum. (shown below)

“It is AHCA’s position that the use of the FSES is appropriate for all the requirements for “Discharge of Exits” contained in Section 7.7 to include pathways to public ways. Section 4.6.10.3.2 of NFPA 101A states: “exit routes also shall be considered deficient if they fail to meet the requirements of 18.2.1 through 18.2.7 or 19.2.1 through 19.2.7 (NFPA 101), for the egress routes involved.” Sections 18.2.7 and 19.2.7 refer back to Section 7.7, Discharge of Exits, which contains the requirements for the pathways to a public way.”

**QUESTION:** Is it the intent to permit NFPA 101A, Chapter 4 – Fire Safety Evaluation System for Health Care Occupancies, to be used to evaluate the level of safety provided for a health care occupancy that does not conform with the provisions of NFPA 101, Section 7.7 – Discharge from Exits, such as that related to the exit discharge path to a public way?

**ANSWER:** Yes.

**Issue Edition:** 2001

**Reference:** 4.6.10.3.2

**Issue Date:** January 10, 2006

**Effective Date:** January 30, 2006

**Supplemental Agenda Items - #2 – Veterans  
Administration (VA)**

# Healthcare Interpretations Task Force Request Form

(For June 2006)

Name: Gene Cable, Veterans Affairs

Address: PO box 8980, VA Albany NY 12208

Phone: (518) 626-5551

Document to be interpreted: NFPA 101 (2000) section 18/19.3.5, 9.7.1.1,  
NFPA 101 (2003 and 2006) same sections  
NFPA 13 (1999) Section 5-13.9.2, A5-13.9.2  
NFPA 13 (2002) Section 8.14.8.2, A8.14.8.2

Edition: 2000, 2003 and 2006

Background Information (optional): The following is quoted from the May 2000 Minutes, the HITF ruled as quoted here,

**"Sprinkler/Wardrobe Issue:** This item had been discussed at previous meetings, **yet no formal action had ever been requested.** (highlight added) NFPA received three letters that asked if the HITF could take a look at these items and, if appropriate, provide an interpretation. A written response from HCFA was passed out. In all three cases, since it appeared that the basis for these questions centered on HCFA enforcement of the rule, a detailed and thoughtful response from HCFA was prepared. Two primary issues were raised, the first one being that individuals should contact the regional HCFA inspectors if they are unclear on the HCFA policy on this issue. Number 2, HCFA does have a detailed policy and fix for the need, or lack of need, for sprinklers in select wardrobe units. This policy has been widely distributed to HCFA inspectors and has been used on countless occasions to remedy the sprinkler/wardrobe problem. The HITF believe that the current HCFA policy addresses this issue. If individuals believe that NFPA 13, *Standard for the Installation of Sprinkler Systems* should be changed or modified to further address this issue, then it is appropriate for proposals to be submitted for the next revision cycle of NFPA 13. In addition, it is noted that the 2000 edition of NFPA 101: 3.3.33 now defines contents and furnishings. This should help to separate furniture objects from building objects in terms of automatic sprinkler coverage. NFPA will send a response to this effect to the individuals who have raised this issue and refer them to HCFA Interpretative Guide of 30 August 1993."



The picture illustrates existing conditions and even new construction situations where reasonable local AHJs have NOT required sprinkler protection within the small closets. This presents a continuing problem. Obviously the HCFA 1993 interpretive guide is not well known or, more likely, is itself interpreted differently (note the small vent louver in the door, did this meet the HCFA requirements for "open louvers" allowing sprinkler water to enter the closet?) Worse, VA has experienced a surveyor asking that the hose closets (8 inches deep by 2 feet 8 inches wide containing only fire hose and a fire extinguisher) be sprinkler protected. Technically, by letter of Code the surveyor is correct. However, reasonable application of Code would dictate a different conclusion.

We are asking for HITF formal action.

The Life Safety Code Objective is to protect the life of occupants not intimate with initial fire growth. For health care occupancies **of non-combustible or limited combustible construction** there is very little likelihood for a concealed fire spreading from the closet to structural members. That leaves the closet fire as a potential life safety threat by products of combustion venting into the room. Even with total combustion of typical materials within a *small* closet there would be little or no threat to life. Reasonable persons point out the "portable" wardrobe scenario or the end table full of combustibles, as examples of other concealed space within the same room where sprinkler protection is not feasible or called for. Room sprinkler protection meets the objective of confining and controlling the fire. Additionally in most other fire protection discussions we credit staff as able to enhance life safety protection, the same in this case. Even if a confined fire continues within the closet staff would most likely have ample time to remove persons from the room.

NFPA 13 allows closets up to 24 sq ft to be non protected in dwelling units and hotels. NFPA 101 goes beyond that allowing closets up to 24 sq ft to be non protected in Board and Care Slow and Prompt and closets up to 12 sq ft to be non-protected in apartments. **The closet pictured above is approximately 1.3 ft wide and 2 feet deep or 2.7 sq ft.**

Question #1: For sprinkler protected health care and ambulatory health care occupancies of Type I or Type II construction as defined in NFPA 220 can fire extinguisher/occupant hose closets, measuring approximately 3 feet wide and 12 inches deep, be exempted from sprinkler installation?

Question #2: For sprinkler protected health care and ambulatory health care occupancies of Type I or Type II construction as defined in NFPA 220 where the closet is lined with non combustible or limited combustible materials can small built in closets, not exceeding 6 square feet in area, be exempted from sprinkler installation?

Signature: CABLE

Date: May 26, 2006

**Healthcare Interpretations Task Force**  
**Request Form**  
(For June 2006)

Name: Gene Cable, Dept of Veterans Affairs

Address: PO box 8980, VA Albany NY 12208

Phone: (518) 626-5551; cell (518) 641-8549

Document to be interpreted: NFPA 101 (2000 and 2003) Section 1.4.1, A1.4.1

NFPA 101 (2006) Section 1.3.1, 4.6.4, 4.6.7.4, 4.6.7.5, A.4.6.7.4

Edition: 2000, 2003 and 2006

Background Information (optional): Based on A1.4.1 (2000) some AHJs required that features installed to comply with NEW when the building was built must be maintained for the life of the building even though newer Code editions no longer required that feature. To fix that, the 2006 Code was revised to eliminate A1.4.1, but now we may have created a new, much more serious fundamental problem.

Health care occupancies (and all other occupancies for that matter) are built, renovated, or reconstructed with missing features and flaws, either by design error, construction error, or worse, purposeful short-cuts. When completed the building did not comply with Code in one area or another, *and* this problem might not be discovered for months or years after occupancy. Bottom line it was built wrong.

**EXAMPLES:**

Specific example # 1: A hospital built in 1999 is fully sprinkler protected and it was designed and built according to AHJ application of the 1997 Life Safety Code. All exceptions were taken for full sprinkler protection including non-rated patient room corridor walls. The smoke compartments containing patient sleeping rooms are equipped with standard response sprinklers, not compliant for new construction in the Code edition to which the facility was designed to. (1997 Section 12-3.5.2 requires QR for new construction) (2000 Section 19.3.5.2 as referenced by 19.3.6.2.1 exception 1 does not require QR for existing).  
Do these sprinklers have to be changed out to quick response?

Specific example # 2: A hospital built in 1999 was designed and built according to AHJ application of the 1997 Life Safety Code. A relatively small patient floor, containing less than 30 patients, has no smoke barrier. (1997 Section 12-3.7.1(a) requires a smoke barrier) (2000 Section 19.3.7.1 does not require a smoke barrier for less than 30 patients).

Must a smoke barrier be installed?

Specific example # 3: A nursing home built in 1999 was designed and built according to AHJ application of the 1997 Life Safety Code. Several large storage rooms, all much greater than 100 sq ft containing combustibles, were found with non-rated self-closing doors in non-rated frames and the separation walls non-rated but smoke tight slab to slab. (1997 Section 12-3.2 requires a 1-hour fire barrier separation slab to slab with ¾-hour FR self-closing doors) (2000 and 2000 Section 19.3.2 does not require the fire barrier or ¾ hour fire door due to the sprinkler exception, it requires only the smoke tight partition and a non-rated self-closing door.)

Must these walls be reconstructed to 1-hour fire barrier and the doors and frames replaced with ¾-hour fire rated?

It appears the 2006 Code does not have a Code section by which an AHJ can require that these missing features or flaws be installed or fixed - when that missing feature or flaw is not required for existing facilities.

Question :

This question is predicated on the fact that for existing buildings the AHJ always has the authority to modify requirements "if their application would be impractical in the judgment of the authority having jurisdiction." (2000, 2003 and 2006, section 4.6.4)

If a building is discovered to contain a condition that is not in compliance with the requirements for New for an old edition of the Life Safety Code for which the building was designed, but the condition is in compliance with the requirements for Existing for the current edition of the Life Safety Code, is it the intent of the Code that the building be modified so that it will be brought into compliance with the requirements for New for the edition of the Life Safety Code for which the building was designed?

Signature: CABLE

Date: May 30, 2006

**Healthcare Interpretations Task Force**  
**Request Form**  
(For June 2006 meeting)

Name: Gene Cable, Veterans Affairs

Address: PO box 8980, VA Albany NY 12208

Phone: (518) 626-5551. cell: (518) 641-8549

Document to be interpreted: NFPA 101 (2000) section 19.7.1.2  
NFPA 101 (2006) section 19.7.1.4, 19.7.1.6, A19.7.1.4

Edition: 2000 and 2006

Background Information (optional): HITF addressed a very similar question in May 15, 2001 Disneyland Hotel from NFPA staff, "NFPA Request - Frequency of fire drills at SNF". It apparently concerned a State agency and drill requirements at a SNF attached to a hospital. The HITF did not make a formal interpretation and the minutes went on to say, "Unless the state regulatory agency made some determination with respect to licensing that the SNF and healthcare facility were one in the same, the drills must be completed independent of each other."

A new situation is emerging where fire alarm systems, with their amazing micro processing capabilities, are designed to limit where the alarm is sounded. These options are taken in coordination with the fire plan.

For example, a large 7-story healthcare facility is separated by 2-hour fire barriers into three buildings, Russell, Hamblet, and Stevens. Where buildings are attached and the option is taken to sound an alarm signal only in the Hamblet building, what effect would that have on the fire drill requirement? For the facility, did we just go from 12 drills per year to 36? The telephone operator still makes the Code Red announcement heard in all three buildings and selected staff respond from all three buildings according to the fire plan, to the fire area.

NFPA 101 A.19.7.1.4 states, "the purpose of a fire drill is to test and evaluate the efficiency, knowledge, and response of institutional personnel in implementing the facility fire emergency plan." . . . "Fire drills should be scheduled on a random basis to ensure the personnel in health care facilities are drilled not less than once in a 3-month period."

JCAHO EC.5.30 (2006) states, "The organization conducts fire drills regularly." EP 1. "Fire drills are conducted quarterly on all shifts in each building defined by the LSC as the following: Ambulatory Health care occupancy, Health care occupancy, Residential occupancy." EP # 5 "Staff in all areas of every building where individuals are housed or

treated participate in drills to the extent called for in the facility's fire plan." EP # 7 "The effectiveness of fire response training according to the fire plan is evaluated at least annually."

**Specific example # 1:** A health care facility consists of two buildings that abut each other but are separated by a 2-hour fire barrier. The fire plan calls for selected staff in building A to respond to the fire zone in building B. The fire alarm system activates only in Building B and a "Code Red" announcement is transmitted to both buildings according to the fire plan. Are a total of 12 drills per year sufficient, randomly conducted among the two buildings? I believe YES.

**Specific example # 2:** Given the same situation as example # 1 except the fire plan does not call for staff in "Building A" to take action for an alarm in Building B, the fire plan does NOT call for staff response from one "building" to another. The phone operator "Code Red" announcement is still transmitted to both buildings. Does the drill in building B count as a fire drill only for building B? I believe YES. Now 24 drills are required for the facility? I believe YES.

**Specific example # 3:** Given a situation where a medical center is divided into several distinctly separated buildings, such as a mental health campus facility consisting of nine buildings connected by tunnels. The fire plan is specific to the building in alarm with the plan stating that available personnel from the neighboring two buildings respond to assist. The fire alarm system gives an automatic voice Code Red announcement throughout all nine buildings. Would 12 drills per year be sufficient for each group of three buildings? I believe YES. Campus wide would 36 drills per year meet the Code intent, 12 drills for each group of three? I believe YES.

#### QUESTION:

Is it the intent of the Code that twelve drills, once per quarter per shift, be conducted according to the extent of participation called for in the fire plan rather than according to building designation?

Signature: CABLE

Date: May 31, 2006

**Minutes of HITF Task Force on Door Locking  
Teleconference Meeting**

**JAEGER & ASSOCIATES, LLC**  
**11902 Holly Spring Drive**  
**Great Falls, Virginia 22066**

T (703)-433-5880  
F (703)-433-5888  
C (703)-674-6379  
[Tjaeger1@aol.com](mailto:Tjaeger1@aol.com)

Minutes of HITF Task Force on Door Locking  
Teleconference Meeting

- I. The Task Force met via teleconference on May 30, 2006. Present were Dale Woodin, Joe Bermes and Tom Jaeger.
- II The Task Force identified the various reasons why doors in the means of egress might be required to be locked. These being:
  - Clinical needs of the patient - Clinical needs was identified as medical or psychiatric needs of the patient as determined by clinical staff of the health care facility.
  - Detention of the patient – Patients who are considered a danger to society or to themselves as determined by the courts or the clinical staff of the health care facility.
  - Security needs of the patient – Safety and security of patients from others as determined by the management of the health care facility.
  - Lockdown needs – The need to protect the occupants of the building, the public outside the building, the building itself or the contents of the building due to such events as national disasters, civil unrest or release of weapons of mass destruction as determined by the management of the facility or civil authorities.
- III The Task Force felt that the clinical needs of the patient and detention of the patient were adequately addressed in Sections 18 & 19.1.1.3, 18 & 19.1.1.5 and 18 & 19.2.2.2 thru 2.2.5 of the 2006 *Life Safety Code*.
- IV The Task Force does not feel that the Security needs of the patient and lockdown needs are adequately addressed in the Code. The following is recommended:

- The HITF develop language for the security needs of the patient and submit a public proposal for the next edition of the *Life Safety Code* or request that the Health Care Occupancy Technical Committee address the issue.
  - The issue of Lockdown needs is very new and controversial. The Task Force is of the opinion that this issue needs to be addressed by a group much broader in membership than this Task Force. We suggest that either the entire HITF Committee address this issue or as a minimum add representatives to this Task Force from CMS, JCAHO and IFMA to address Lockdown.
- V The Task Force did agree that regardless of the reason, whenever doors in the means of egress are locked, that adequate staff and/or systems be present to unlock the doors in a timely manner, when required.

**ENCLOSURE 2**

**Minutes of HITF Task Force on Door Locking  
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