1. Revise 7.7.2 as follows:

7.7.2 Exit Discharge Through Areas on Level of Exit Discharge Interior Building Areas. Exits shall be permitted to discharge through interior building areas provided that all of the following are met:

(1) Not more than 50 percent of the required number of exits, and not more than 50 percent of the required egress capacity, shall discharge through areas on any the level of exit discharge, except as otherwise permitted by one of the following: in 7.7.2.1 and 7.7.2.2 and provided that the criteria of 7.7.2.3 through 7.7.2.7 also are met.

(a) 7.7.2.1 One hundred percent of the exits shall be permitted to discharge through areas on any the level of exit discharge in detention and correctional occupancies as otherwise provided in Chapters 22 and 23.

(b) 7.7.2.2 In existing buildings, the 50 percent limit on egress capacity shall not apply if the 50 percent limit on the required number of exits is met.

(2) Each level of discharge shall discharge directly outside at the finished ground level, or discharge directly outside and provide access to the finished ground level by outside stairs or outside ramps.

(3) 7.7.2.3 The interior exit discharge specified in 7.7.2 shall lead to a free and unobstructed way to the exterior of the building, and such way shall be readily visible and identifiable from the point of discharge from the exit.

(4) 7.7.2.4 The interior exit discharge shall be protected by one of the following methods:

(a) The level of discharge shall be protected throughout by an approved automatic sprinkler system in accordance with Section 9.7, or the portion of the level of discharge used for interior exit discharge shall be protected by an approved automatic sprinkler system in accordance with Section 9.7 and shall be separated from the nonsprinklered portion of the floor by fire barriers with a fire resistance rating meeting the requirements for the enclosure of exits. (see See 7.1.3.2.1.)

(b) 7.7.2.5 The requirement of 7.7.2.4 shall not apply where the interior exit discharge area shall be in a vestibule or foyer that meets all of the following criteria:

(i) The depth from the exterior of the building shall be not more than 10 ft (3050 mm), and the length shall be not more than 30 ft (9140 mm).

(ii) The foyer shall be separated from the remainder of the level of discharge by construction providing protection not less than the equivalent of wired glass in steel frames.

(iii) The foyer shall serve only as means of egress and shall include an exit directly to the outside.

(5) 7.7.2.6 The entire area on the level of discharge shall be separated from areas below by construction having a fire resistance rating not less than that required for the exit enclosure, unless otherwise provided in 7.7.2(6) 7.7.2.7.

(6) 7.7.2.7 Levels below the level of discharge in an atrium shall be permitted to be open to the level of discharge where such level of discharge is protected in accordance with 8.6.7.

Submitter’s Substantiation: Schirmer Engineering Corporation (Schirmer Engineering) has submitted this proposed Tentative Interim Amendment (TIA) to address a technical issue with the 2009 edition of the Life Safety Code (NFPA 101). The issue concerns the "level of exit discharge" and its definition and use/intent in NFPA 101 Chapter 7.

Issue

The 2009 NFPA 101 permits a maximum of 50% of the number and capacity of exits to egress through areas on the level of exit discharge. However, NFPA 101 also has a more specific definition – the story at which not less than 50% of the number and capacity of exits discharge to the exterior. It is Schirmer Engineering’s opinion
that this definition is intended to be used for construction type limitations by occupancy and building classification within the code, such as an underground structure, and not for the individual exit discharge requirements within NFPA 101 Chapter 7. This intent is also evident in the exit stair sign requirements, which specify that the “story of exit discharge” for the stair be included on a sign within the stairwell. This story is the specific level at which the stair terminates and occupants should exit the stair and might vary depending on the stair; it is not the identified story per the NFPA 101 definition of the Level of Exit Discharge (LED).

**Substantiation**

The definition for Level of Exit Discharge is used to determine construction type limitations by occupancy (e.g. number of levels above/below LED), and a building classification and its associated requirements (i.e. Underground Structure – A structure or portions of a structure in which the floor level is below the level of exit discharge).

**2009 NFPA 101**

**3.3.77.1 Level of Exit Discharge.** The story that is either (1) the lowest story from which not less than 50 percent of the required number of exits and not less than 50 percent of the required egress capacity from such a story discharge directly outside at the finished ground level; or (2) where no story meets the conditions of item (1), the story that is provided with one or more exits that discharge directly to the outside to the finished ground level via the smallest elevation change.

The term “level of exit discharge” is used to describe the location of the door from the exit (stair enclosure) to discharge the stair directly to the outside as noted in the appendix for an exit. This includes the use of exit passageways or egress through areas on this level to reach the outside.

The 2009 NFPA 101 requires exits to discharge directly to the exterior of the building, and must continue to the public way. Additionally, NFPA 101 recognizes interior exit discharge, or egress through the level of exit discharge, for exits. This allows up to 50% of the number and capacity of exits to have their discharge through the interior of the building provided specific criteria are met, applicable to all occupancies. The level of discharge for individual stairs may be different; however, the 50% requirement must be applied to the aggregate building exits.

**Emergency Nature:** The proposed TIA intends to correct a circumstance in which the revised document has resulted in an adverse impact … that was inadvertently overlooked in the total revision process…. See the attached schematic diagram of the issue, which is caused by a sloping grade for the building. The current text creates an unintended condition that requires an additional exit passageway on the 1st Floor.
Figure A1: Schematic diagram of building on sloping grade, which requires additional exit passageway on 1st Floor per definition of the Level of Exit Discharge (LED) and current text of NFPA 101 Section 7.7.2. The arrangement shown in the diagram should be permitted.

Anyone may submit a comment by the closing date indicated above. To submit a comment (on company letterhead), please identify the number of the TIA and forward to the Secretary, Standards Council, 1 Batterymarch Park, Quincy, MA 02169-7471.