REFERENCE: Letter dated March 16, 1999 from Chris Kates, DOHSM Navajo Area Indian Health Service.

ISSUE: Is the existing mechanical penthouse (an unoccupied space) door that opens into the central egress stairwell in violation of the 1997 NFPA 101 Life Safety Code (LSC)? If so, can a waiver be granted for this existing condition?

LOCATION: Gallup Indian Medical Center (GIMC), Gallup, NM

BACKGROUND: Building 2000, the main hospital building is an existing health care occupancy. An NFPA 101 Life Safety Code Survey was conducted by the Navajo Area Indian Health Service on February 17-18, 1999. The Survey discovered that the mechanical penthouse, an unoccupied space, opens directly into the central egress stair that is a required exit enclosure for other floors within the building.

The penthouse is equipped with smoke detectors. The penthouse door opening to the stairwell is a 90-minute door with an automatic door closure, which provides a 2-hr fire rating, consistent to the 2-hr fire rating of the stairwell.

Building 2000 is sprinklered throughout. Most portions of the building are sprinklered with quick response sprinkler heads. The fire response plan for the hospital provides for immediate response of personnel to the site during an emergency. Drills for the fire response plan are conducted regularly.

DISCUSSION: LSC 5-1.3.2.1 (d) states that "Openings in exit enclosures are limited to those necessary for access to the enclosure from normally occupied spaces and corridors, and for egress from the enclosure."

The LSC Handbook commentary specifically states, "No opening - including a door - through the exit enclosure walls is permitted from . . . boiler rooms, equipment rooms, utility rooms, . . . or similar spaces that are not normally occupied."

INTERPRETATION: The penthouse door is in violation of LSC 5-1.3.2.1 (d). There are no exceptions for existing conditions permitted by the Code. However, due to the level of Life Safety features present in the building, a waiver may be possible through the Fire Safety Evaluation System (FSES) in accordance with NFPA IOIA, Chapter 3. The Area should complete an FSES and resubmit to the Codes Committee if a waiver is requested.

SIGNATURES:

☑ Concur ☐ Do Not Concur DATE: 8-19-99 /Steven E. Raynor/
NAME: Steven E. Raynor, P.E.
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☑ Concur ☐ Do Not Concur DATE: 8-18-99 /Joseph L. Bermes/
NAME: Joseph L. Bermes, R.A, WA #007191
☒ Concur ☐ Do Not Concur DATE: 8-18-99
NAME: James L. Crawford, Sr.
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☒ Concur ☐ Do Not Concur DATE: 8-19-99
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