

Engineering Services Codes Committee  
Review Summary

REFERENCE: NFPA Life Safety Code (LSC), 2000 Edition  
Chapter 19 Existing Health Care Occupancy  
Chapter 7 Means of Egress

NFPA 101 Life Safety Code, (2012) Edition  
Chapter 38 New Business Occupancy  
Chapter 7 Means of Egress

ISSUE: Locked doors within a Means of Egress

LOCATION: Cass Lake Hospital Addition, Cass Lake, MN [Bemidji Area Office]

DISCUSSION: See below.

INTERPRETATION: See below.

An initial Code Interpretation request was made to IHS-Engineering Services in a July 23 2013 e-mail from Peter Hartmann, the IHS-Bemidji Area Office Facility Engineer. The request was forwarded to the Chairman of the IHS Division of Engineering Services Code Committee (Committee) on August 6 2013. Mr. Hartmann asked the IHS Authority Having Jurisdiction (AHJ) to review the Cass Lake Hospital Addition designer's plans for compliance with the National Fire Protection Association's Life Safety Code (LSC). Attachments included the Project AE's Life Safety Narrative, and floor plan drawings showing the proposed remotely controlled door hardware on locked doors in the lower level's Means of Egress.

Following their review of the issue, the Code Committee asked the Bemidji Area Office to re-submit their request in the form of a specific question. On August 29 2013 the Committee Chair received the following revised interpretation request:

**Is it permissible to lock the six (6) Primary Care Department doors, located in the required path of egress, from the egress side, as described in the EAPC Life Safety Narrative dated July 15, 2013?**

The IHS Division of Engineering Services Code Committee met again on September 11 2013. Per the (2010) edition of the IHS AE Design Guide [Chapter 2.2.2 (1)], the NFPA 101 Life Safety Code (LSC) is the governing code for determining and maintaining life safety requirements for all occupancies in new IHS facilities, and is cited by the project's designer as the Basis of their Life Safety Design.

Because the Cass Lake Hospital's new Outpatient Clinic addition will house occupants (patients, visitors and staff) capable of self-preservation, the appropriate Occupancy Type for the Outpatient Clinic is **New Business Construction** (Chapter 38 of the 2012 LSC). Means of Egress requirements in a New Business Occupancy are addressed in the LSC's Chapter 38.2 :

38.2.2	Means of Egress Components
38.2.2.1	Components Permitted
	Means of egress components shall be limited to the typed described in 38.2.2.2 through 38.2.2.12

38.2.2.2	Doors	
38.2.2.2.1		Doors complying with 7.2.1 shall be permitted
38.2.2.2.2 – 38.2.2.2.9		Describes specific allowable door locking systems, and references corresponding to LSC Chapter 7 requirements.

Chapter 7 of the 2012 LSC is titled **Means of Egress**, and Chapter 7.2.1.6 describes the requirements which must be met in order for the specific locking arrangements listed to be allowable:

7.2	Means of Egress Components
7.2.1	Door Openings
7.2.1.6	Special Locking Arrangements
7.2.1.6.1	Delayed-Egress Locking Systems
7.2.1.6.2	Access-Controlled Egress Door Assemblies

INTERPRETATION: The appropriate Occupancy designation for the outpatient clinic addition to the Cass Lake Hospital is New Business. All components located in a Means of Egress in a New Business Occupancy are required to meet the standards of the LSC's Chapter 7.2 (2012). Special Locking Arrangements in a Means of Egress, are permitted in a New Business Occupancy if they comply with the requirements of Chapter 7.2.1.6.

The LSC does not permit the six (6) Primary Care Department doors to be locked in the manner proposed (as described in the EAPC Life Safety Narrative dated July 15, 2013).

## SIGNATURES:

<input checked="" type="checkbox"/> Concur	<input type="checkbox"/> Do Not Concur	DATE: <u>09/30/2013</u>	<u>/Dwight Packer/</u> Dwight Packer, RA KS #3507
<input checked="" type="checkbox"/> Concur	<input type="checkbox"/> Do Not Concur	DATE: <u>09/30/2013</u>	<u>/John Bausch/</u> John Bausch, PE WA #28963
<input checked="" type="checkbox"/> Concur	<input type="checkbox"/> Do Not Concur	DATE: <u>09/30/2013</u>	<u>/Michael Young/</u> Michael Young, PE WA #38245
<input checked="" type="checkbox"/> Concur	<input type="checkbox"/> Do Not Concur	DATE: <u>09/30/2013</u>	<u>/Suresh Shah/</u> Suresh Shah, PE OK #13259
<input checked="" type="checkbox"/> Concur	<input type="checkbox"/> Do Not Concur	DATE: <u>09/30/2013</u>	<u>/Gerald Inglett/</u> Gerald Inglett, RA OK #1597