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| February EFCOG Fire Protection Task Team Meeting Minutes | | | | | |
| 3.1.2016 | | 1:30 MST | | Skype Meeting / 505-844-5300 | |
| Meeting called by | Julie Cordero, Chair | | | | |
| Type of meeting | Monthly Meeting | | | | |
| Facilitator | Julie Cordero | | | | |
| Note taker | Julie Cordero | | | | |
| Timekeeper | N/A | | | | |
| Attendees | Allan Coutts, Neal Hara, Chuck March, John Saidi, James Collins, Charles McKnight, Rich Lewis, Tom Allison, Will Cosey, Rob Nii, Harvey Goranson, James Apida, Bill Brown, Ryan Lehnert, Alex Smith, Jessy Innocent, Jim Bisker, Julie Cordero | | | | |
| Action Item Review | | | | | |
|  | Julie Cordero | | | | |
| Discussion | Status update | | | | |
| The Welding Task Team POC information was sent out to the distribution on 1/14/16. | | | | | |
| Conclusions |  | | | | |
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| Action Items | | | Person Responsible | | Deadline |
| Confirm membership of all individuals on distribution and provide non-members the option to join. Non-members not wishing to join will be removed from the distribution. | | | Julie Cordero | | On-going |
| Identify leads for topical discussions | | | Julie Cordero | | On-going |
| Add other universities to the spreadsheet (University of Tennessee, Eastern Kentucky University) and post to Repository. | | | Josh Herrera | | Pending posting by Jim Bisker |
| Reminder: Multiple documents have been posted to the Repository (i.e., Delegation of Authority Letters, Equivalencies and Exemptions, Applicability Matrices for DOE O 420.1C, DOE-STD-1066-2012 and DOE-STD-1020-2012,), <http://hqlnc.doe.gov/eh/Fire+Protection.nsf/hp?OpenForm>. Login uses first and last name (e.g., Jane Doe). Verify member information is correct. Send Jim Bisker an e-mail at [Jim.Bisker@hq.doe.gov](mailto:Jim.Bisker@hq.doe.gov) so he can reset your password, if needed. | | | All | | On-going |
| Contact Jeff Feit for FP POC list with committee memberships (e.g., NFPA) | | | Julie Cordero / Charlie Kronvall/Tobin Oruch | | TBD |
| Draft a proposed list of codes/standards, along with a schedule, to consider for a joint-Contractor review effort. | | | Rich Lewis | | TBD |
| Fire Water Tank Drain Valves | | | | | |
|  | Rich Lewis | | | | |
| Discussion | SRS lubricates and cycles their Fire Water Tank drain valves annually.  NFPA 25 isn't particularly clear that drain valves need to be cycled like control valves.  The concern is that one day they are going to open a drain valve and not be able to close it. How are other sites interpreting the NFPA provision and performing ITM? | | | | |
| cid:_1_09FA7AAC0CFF88C4006E24FC85257F5D | | | | | |
| Conclusions | Drain valves do not fit the Control Valve definition in NFPA 25 (2014 Edition, 3.5.1, Control Valve. A valve controlling flow to water-based fire protection systems.) John Saidi, who sits on the NFPA 25 technical committee, agrees that these requirements do not apply to drain valves. | | | | |
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| Action Items | | | Person Responsible | | Deadline |
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| DOE-STD-1066 Revision Status | | | | | |
|  | Julie Cordero | | | | |
| Discussion | Status update  Delegated Authority  Leased Facilities  Any major show stoppers?  Any interest in joint review/comments from this EFCOG Task Team? | | | | |
| Per Jim Bisker, all reviews have been completed and the standard is expected in RevCom by next week. He will send out a notice to his distribution when that occurs. A notice will also go out to all Tech Standards Managers. Per John Saidi, this is typically through the Business or Contracting office for each Contractor.  Contractor comments normally go through the Field Offices, although not necessarily through the FPE.  There are protocols for accepting/rejecting comments.  Julie asked Jim how the Contractors can help facilitate the RevCom process and if it would help to have comment agreement and then each site can submit the same comments through RevCom. Jim stated that this would make the process more difficult and the Fire Safety Committee forum can be used to discuss comments. Thus, Jim will be scheduling Fire Safety Committee Meetings while STD-1066 is in RevCom.  A red-lined Revcom courtesy copy should be provided. | | | | | |
| A DOE Fire Safety Committee Meeting was hosted by Jim Bisker on 1/26/16. Jim Bisker sent out a clean pre-RevCom version on 2/4/16 and asked for (1) any minor corrections and edits you would like to see (with full suggested fixes) and (2) any major show stoppers you might see going into RevCom. The plan is for AU to get it into the system by the end of February for a 60 day review period. Note: RevCom will be closed at the time of the DOE Fire Safety Workshop.  Jim O'Brien decided the schedule last spring: DOE O 420.1 C (Change 2), 1066, 1020 (NPH) and 1189 to all get published before the next president takes office. | | | | | |
| Follow-up discussion from last month:  Sandia is making progress on developing a flow chart used to determine applicability of DOE O 420.1C to all facilities (e.g., leased facilities, land-use permitted areas). FEB STATUS UPDATE: This is currently being reviewed by the Sandia Field Office and a joint SFO/SNL Meeting is scheduled for late March.  Status Needed: Wildland fire implementation guidance (i.e., ‘should’ statements) is being proposed for inclusion, based on DOE O 450 verbiage. FEB STATUS UPDATE: none  Per Chuck March, one nagging item left over from the last revision is that the document refers to model FHAs in Appendix B section B 1.4. While the DOE server does have some documents on-line, these are probably 20 years old and do not address current guidance. Is anyone interested in developing more current examples that could be proposed (Note: document classification may present an issue)? Otherwise, if the group doesn’t think these types of examples are of significant value, DOE should probably consider eliminating the references. Additional discussion: The FHAs referenced in Appendix B were from the mid-‘90’s and might have come from Y-12. They were likely written to O 5480.7. John Saidi also sees minimal value and supports the deletion. FEB STATUS UPDATE: The latest draft contains no references to the “model” copies on the DOE Fire Protection website.  John Saidi has proposed leased facilities and BNA language to Jim Bisker. The BNA Section 6 proposal now references O151.1C. O151.1C is a different topic on a whole. FEB STATUS UPDATE: John assumes all his comments made it into the current proposed draft.  Tom Allison sent editorial and FHA revision proposals to Jim Bisker. FEB STATUS UPDATE: Most of Tom’s comments were not incorporated into the current proposed draft. Jim Bisker stated that the proposed ‘Who/What/Where’ concept is a holistic path and needs agreement. Tom should submit comments in RevCom for consideration.  Tom Allison proposed removing the HEPA filter Nuclear Confinement, Chapter 4, last 4-5 pages (they cannot be tied to 420.1C) and incorporating them into the DOE Ventilation Handbook which is currently under revision. Rob Plonski confirmed that ~90 of the material had been proposed for removal in the current red-lined version. FEB STATUS UPDATE: Tom stated that his SME’s have voiced concerns that the material in the last 4-5 pages of Chapter 4 are outdated. Plus, the requirements cannot be tied to a 420.1C requirement. The Handbook POC is Sonya Barnett (sp?). Tom should submit comments in RevCom for consideration.  Julie opened up for discussion the proposal to add examples to the definitions of equivalencies and exemptions. Each site is interpreting differently and this could bring more consistency across the complex. As a rather extreme example, a missing code-required manual pull station and no intent to install one would require an Exemption Request. An installed manual pull station that does not meet code (e.g., >5’ from the exit), would be repaired based on the site’s documented procedure (e.g., identifying deficiencies per an FPA process, prioritizing the deficiencies, repairing the deficiencies based on priority) and would not require an equivalency or exemption. 1066 may or may not be the appropriate place for examples. FEB STATUS UPDATE: The revised language in 1066 is a major concern [5.2.4.2 The DOE Head of Field Element may approve generic equivalencies to specific standard or code requirements (for example, handrail height deviations of 2 inches or less)]. At Sandia, this handrail height example would currently be considered a deficiency (thus, corrected based on priority) and would not be considered for equivalency. Rob Nii and Chuck March agreed that it would be beneficial to have the equivalency and exemption terms defined. Each site has their own interpretation and this has led to a drastically different approach as demonstrated by the differing numbers of equivalencies/exemptions (i.e., some sites have a few dozen while other sites have a few hundred). | | | | | |
| 5.2.4 Delegated Authority  5.2.4.1 DOE O 420.1C (Section 5.c(6)) assigns the responsibilities for the AHJ to the DOE Heads of Field Elements under advisement of a FPE as the subject matter expert. Approval authority for exemptions, equivalencies, and alternatives shall not be delegated to a contractor.  Comments/Discussion Item: If the Field Office deems equivalency/alternative approval (e.g., within IBC and NFPA) falls within routine activities, this language prohibits the Field Office from making that determination.  5.2.4.2 The DOE Head of Field Element may approve generic equivalencies to specific standard or code requirements (for example, handrail height deviations of 2 inches or less).  Comments/Discussion Item: The term “generic equivalency” is not defined in the standard. How many sites use this concept? Do sites submit equivalencies for items such as handrail height deviations? SRS also uses the term generic equivalencies (e.g., for weather enclosures over outside stairs, hydrant distances to buildings).  5.2.4.3 The Heads of Field Elements may designate a contractor as the site’s AHJ to act as DOE’s representative for routine activities. DOE retains the right to override decisions of the contractor, including the interpretation and application of DOE orders, guides, standards, and mandatory codes and standards.  5.2.4.2 Routine activities include: issuing of permits; reviewing and approving construction documents and shop drawings (new construction, modification, or renovation); accepting fire protection equipment, materials, installation, and operational procedures (fire system inspection and testing), interpretation of building codes or standards; and other routine activities that are specifically identified and delegated by the DOE Heads of Field Elements.  Comments/Discussion Item: Any feedback on the Sandia Field Office document that was sent out on 2/5/16?  5.2.4.4 A contractor AHJ shall maintain a current written record of all delegations made by DOE for fire protection activities.  5.2.4.5 The DOE Head of Field Element shall be designated as the Building Code Official for the purposes of enforcement. The DOE Head of Field Element may delegate, to the contractor, responsibility for routine code activities, but may not delegate approval authority for alternatives to building code requirements.  Comments: If the Field Office deems equivalency/alternative approval (e.g., within IBC and NFPA) falls within routine activities, this language prohibits the Field Office from making that determination. | | | | | |
| DOE O 420.1C Chg 1, 3.a. Departmental Applicability. This Order applies to all DOE elements with responsibility for design, construction, management, operation, decontamination, decommissioning, or demolition of government-owned or government-leased facilities and onsite contractor-leased facilities used for DOE mission purposes.  Applicability to leased facilities (i.e., offsite Contractor leased facilities): clarification is needed to help Contractors implement. Input from Legal and Contracting is needed. | | | | | |
| Is there any interest in joint review/comments from this EFCOG Task Team for input into RevCom? | | | | | |
| A concern expressed by several Contractors was that RevCom comments were not adequately dispositioned last time 1066 was updated. Clarification is needed on the RevCom process. Additionally, red-line comments submitted in preparation for this revision were not incorporated in the latest draft version. | | | | | |
| Conclusions |  | | | | |
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| Action Items | | | Person Responsible | | Deadline |
| Schedule Fire Safety Committee Meetings during the STD-1066 RevCom period | | | Jim Bisker | | Prior to RevCom closure |
| Provide examples of exemptions (e.g., unsprinklered tent structures), equivalencies (site-wide ITM extended frequencies), AHJ Interpretive Authority (e.g., portable generators not NRTL listed) documents | | | Robert Nii | | 3/23/16 |
| ITM at Leased Facilities | | | | | |
|  | Mike Cates | | | | |
| Discussion | INL’s process for ITM at leased facilities | | | | |
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| Conclusions |  | | | | |
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| Action Items | | | Person Responsible | | Deadline |
| INL’s process for ITM at leased facilities | | | Mike Cates | | Mar or April Meeting |
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| Upcoming Meetings | | | | | |
|  | Julie Cordero | | | | |
| Discussion | Nuclear and Facility Safety Programs Annual Workshop 2016 (Event ID#34210) has been approved by DOE: May 2 – 6th  Alexis Park Hotel, Las Vegas, NV  Fire Safety track (aka DOE Fire Safety Workshop)  EFCOG Annual Meeting: June 2-day (requires conference approval)  Washington DC (?)  High-level policy discussions with congressional representatives; good experience for a 1st time attendee  Will include EVMS activities discussion | | | | |
| Jim Bisker sent out detailed information on 2/23/16.  Mon: Travel day  Tues: Training (e.g, municipal water supply infrastructure management)  Wed: Main Plenary Session in AM (e.g., keynote speakers, awards presentation) and Fire Safety Track in PM  Thurs: Fire Safety Track in AM and Fire Safety Committee Meeting in PM (e.g., review committee activities and discuss regulatory revisions)  For those interested in presenting during the Fire Safety Track, send Jim Bisker a brief description of your topical area. | | | | | |
| Jensen Hughes provided an overview of FPS (Fire Protection Suite) that can be used for impairments, hot work, etc. Is there any interest in a demo being provided at the DOE Fire Safety Workshop (this could be done at a table in the corridor and open to those during break)? | | | | | |
| Conclusions |  | | | | |
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| Review of Proposed Topics for Future Meetings | | | | | |
|  | Julie Cordero | | | | |
| Discussion | Proposed topics (from the Jan 2015 survey and others recommended via e-mail or at July meeting):   * ITM at Leased Facilities (Lead: Mike Cates) [Mar/Apr 2016 Agenda] * AHJ Delegations & Impact on Contractors (Lead: John Saidi) [Mar 2016 Agenda] * Review of Office of Enterprise Assessments Lessons Learned from Targeted Reviews of Fire Protection Programs at DOE Nuclear Facilities (8/7/15) recommendations for all sites across the DOE Complex, <http://energy.gov/ea/services/assessments/environment-safety-and-health-assessments/review-reports> * Fire Safety & Evacuation Plans * RCM (e.g., Fire Extinguishers) * Gloveboxes (e.g., suppression options, utilization of non-combustible materials) * Management of Combustible Loading (i.e., guidelines/thresholds, how combustible materials are quantified so that operations personnel can determine compliance with combustible loading requirements) * Tritium Exit Signs (e.g., who uses them, replacement, disposal method) * Fire Dynamics Simulator (e.g., who uses FDS, are results used to support a technical position or an engineering judgement) * Chemical Management * FPE Staffing Needs Analysis * Halon Removal Efforts * Program Performance Metrics * Tenability Standards for Performance-Based Design * Fact Sheet on Fire Protection Considerations with Green Building Design * Innovative R&D * NFPA 801 (i.e., limited combustible construction conflict with DOE-STD-1066) * \*NEW: NFPA 13 Dry Pipe Systems – Nitrogen Systems * Legacy Issues with Facilities that have an Unknown COR (e.g., Non-Compliance with NFPA Codes and Standards) * 2015 NFPA 101, 13.7.6.1, requirements for crowd managers in Assembly Occupancies * Positive Accountability for Evac Drills * As-built Drawings * VTR/SCIF Locksets * IFC vs. NFPA vs. DOE-STD-1212 Maximum Allowable Quantities   Topics discussed in past meetings:   * Acceptance Testing of New Emergency Lights (i.e., post maintenance test requirement when emergency lights are replaced) [July 2015] * Glycerin Anti-Freeze Change-Out [Oct 2015] * Underground/Subterranean Facilities (Lead: John Kubicek) [Nov 2015] * Review/documentation of newly published codes/standards for implementation [Dec 2015] | | | | |
| Conclusions |  | | | | |
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| Action Items | | | Person Responsible | | Deadline |
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| Additional Discussion Items | | | | | |
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| Discussion | Previous Topic Follow-Up:  New Topics: At SRS, a cracked impeller was found when rebuilding the fire pump. No others voiced concerns over experiencing this issue. | | | | |
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| Conclusions |  | | | | |
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| Action Items | | | Person Responsible | | Deadline |
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