

# **NFPA 101 - LIFE SAFETY CODE UPDATE**

## **SUMMARY OF REVISED REQUIREMENTS FOR AMBULATORY SURGERY CENTERS (ASC's)**

NFPA 101 - LSC 2012 Edition was adopted by CMS November 1, 2016. Ambulatory Surgery Centers (ASC's) have until July 5, 2017 to comply. The following is a summary of revised requirements relevant to ASCs.

### **FIRE DOOR TESTING AND INSPECTION**

- Sections 7.2.1.15.2 and 8.3.3.1 of NFPA 101 require all fire doors to be inspected and tested in accordance with NFPA 80 Standards.
- Personnel conducting the inspection must have a thorough knowledge and understanding of the operational components of the doors being inspected.
- Qualifications for individuals performing fire door inspections are as follows:
  - NFPA 101 does not specify specific requirements however, the authorities having jurisdiction (AHJs) may want to see how it is determined that the designated personnel are 'knowledgeable and understand the operation and functions of fire door assemblies, i.e. training, education, etc....
- **General requirements for each fire door inspection and testing include:**
  - Annual inspections must be conducted with written records that are dated and signed by the inspector(s);
  - Visually inspect doors for any damage or missing parts;
  - Operate the door fully to ensure the door will close, latch and function properly;
  - Inspect all door hardware and replace all defective items;
  - Clad doors must be inspected for the condition of the wood core;
  - No holes or breaks may exist in the surfaces of the door or frame;
  - Glazing and glazing beads shall be intact and secure;
  - Clearance (undercut) between the bottom of the door and the threshold cannot exceed  $\frac{3}{4}$  inch, unless the bottom of the door is mounted more than 38 inches above the floor, then the clearance may be limited to  $\frac{3}{8}$  inch;
  - Check to make sure coordinators, if installed, are operating correctly;
  - Make sure positive latching hardware secures the door in the closed position;
  - Confirm that no field modifications have been made to the door or frame that would void the fire rating of each;
  - Check door and rating label to ensure it is legible and is the proper rating for the barrier in which it is installed.

## **HAZARDOUS AREAS**

- The Life Safety Code NFPA 101 identifies the following areas as a hazardous area for healthcare occupancies:
  - Boiler rooms
  - Central laundries larger than 100 SF
  - Paint shops
  - Repair shops
  - Soiled linen rooms
  - Trash collection rooms
  - Storage room greater than 50 SF containing combustible materials
  - Laboratories containing flammables or combustible materials in quantities deemed less than "severe hazard"
  
- Changes to 2012 LSC edition pursuant to section 19.3.2.1.5 now allow:
  - Soiled linen rooms that contain no more than 64 gallons or 0.5 per SF of soiled linen will not be considered hazardous areas;
  - Trash collection rooms are now defined as "Rooms with collected trash" and are not considered hazardous area if they contain no more than 64 gallons of trash.

## **ALCOHOL BASED HAND-RUB (ABHR) DISPENSERS**

NFPA 101, Section 19.3.2.6 is a newly introduced section regarding ABHR dispensers

- Aerosol foam dispensers limited to 18 oz. are now permitted
- The ABHR solution is not permitted to exceed 95 % alcohol content by volume
- One dispenser located inside a patient room or suite is not included in the aggregate total amount per smoke compartment
- Dispensers are required to have a minimum 1-inch clearance from the side of and are not allowed to be mounted over ignition sources
- NFPA 101, Section 21.3.2.6 now allows ABHR dispensers in corridors of Ambulatory Care Occupancies when the corridor is at least 6 feet in width

## **SPRINKLER SYSTEM TESTING**

- NFPA 25 *Standards for the Inspection, Testing and Maintenance of Water-Based Fire Protection Systems*, 2011 edition is referenced by the new 2012 LSC.
  - Water-flow switches that are vane-actuated or pressure- switch type are now permitted to be tested **semi-annually**, in lieu of quarterly.

- Electric motor-drive fire pumps are now allowed to be tested on a no-flow basis (via churn test) **monthly** versus weekly.
- Diesel driven fire pumps shall remain to be tested on a weekly basis.

### **GENERATOR TESTING**

- If monthly generator load tests do not meet the 30% capacity of the nameplate rating, then an annual load test shall be required.
- The 2010 edition of NFPA 110 referenced by the 2012 LSC requires a 90-minute load test, rather than a 2-hour load test.
- The new annual test will begin at 50% load for 30 minutes, then to 75% load for 60 minutes, for a total of 90-minutes of continuous testing.
- The 25% load for 30 minutes is no longer required

### **OPERATING FEATURES**

The 2000 edition of NFPA 101 - LSC had limitations on the requirements for combustible decorations and accessories:

- Combustible decorations were not permitted unless they were flame-retardant or had been treated with approved fire-retardant coatings

NFPA 101, Section 19.7.5.6 contains new requirements regarding decorations used in healthcare occupancies

- Combustible decorations that meet the requirements of NFPA 289 and NFPA 701 are now permitted
- Photographs, paintings and 'other art' may be directly attached to walls or non-fire rated doors, provided it does not interfere with the operation of the door
- Combustible decorations (photographs, paintings) may not exceed 20 percent of the wall and ceiling area in unprotected smoke compartments

New requirements for decorations contained in the 2012 edition of the LSC:

- Combustible decorations may not exceed 30 percent of wall or ceiling area in smoke compartments that are protected
- Combustible decorations may not exceed 50 percent of wall or ceiling area inside patient sleeping rooms that have a capacity not exceeding 4 persons in smoke compartments that are protected