

2021 Editions of NFPA 101 and NFPA 5000
BHMA Public Comments
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Chapter 7, Means of Egress (submitted 5/8)

7.2.1.5.3.8

~~Where permitted by Chapters 11 through 43, two releasing motions shall be permitted for doors secured against unwanted entry.~~

Reason:

BHMA is gravely concerned with implications to life safety should NFPA 101 allow up to two releasing motions to release a door for egress. For example, consider these requirements in NFPA 101:

7.2.1.5.10* A latch or other fastening device on a door leaf shall be provided with a releasing device that has an obvious method of operation and that is readily operated under all lighting conditions.

Allowing up to two releasing motions to release a door for egress, would, from a simplistic perspective, allow additional locking / latching hardware to be installed on the door. Unfortunately, simply allowing additional hardware with one more releasing motion also invites unintended consequences.

Only after appropriate additional requirements which address the questions below are included in NFPA 101 Life Safety Code should the occupancy committees consider allowing up to two releasing motions in doors in the means of egress:

- Considering the wide variety of physical and mental abilities of every potential occupant, in every conceivable and inconceivable emergency and non-emergency situation, and in absolute darkness, how can it be assured that each and every potential occupant would know that two releasing motions are required, and be able to accomplish the two releasing motions in order to effect egress?
- If hardware is installed where one releasing motion must occur prior to the second, how can it be assured each occupant will know the required sequence? OR, How can it be assured that not more than two releasing motions are required regardless of the sequence of the motions?

Chapter 15, Existing Educational Occupancies (submitted 5/8)

Public Comment

Section 15.2.2.2.4.1

~~(3) Two non-simultaneous releasing operations shall be permitted where approved by the authority having jurisdiction. The releasing mechanism shall open the door leaf with not more than one releasing motion.~~

Reason:

BHMA is gravely concerned with implications to life safety should NFPA 101 allow up to two releasing motions to release a door for egress. For example, consider these requirements in NFPA 101:

7.2.1.5.10* A latch or other fastening device on a door leaf shall be provided with a releasing device that has an obvious method of operation and that is readily operated under all lighting conditions.

Allowing up to two releasing motions to release a door for egress, would, from a simplistic perspective, allow additional locking / latching hardware to be installed on the door. Unfortunately, simply allowing additional hardware with one more releasing motion also invites unintended consequences.

Only after appropriate additional requirements which address the questions below are included in NFPA 101 Life Safety Code should the committee consider allowing up to two releasing motions in doors in the means of egress:

- Considering the wide variety of physical and mental abilities of every potential occupant, in every conceivable and inconceivable emergency and non-emergency situation, and in absolute darkness, how can it be assured that each and every potential occupant would know that two releasing motions are required, and be able to accomplish the two releasing motions in order to effect egress?
- If hardware is installed where one releasing motion must occur prior to the second, how can it be assured each occupant will know the required sequence? OR, How can it be assured that not more than two releasing motions are required regardless of the sequence of the motions?

Chapter 17, Existing Day Care Occupancies (submitted 5/8)

Public Comment

Section 17.2.2.2.6.1

~~(3) Two non-simultaneous releasing operations shall be permitted where approved by the authority having jurisdiction. The releasing mechanism shall open the door leaf with not more than one releasing motion.~~

Reason:

BHMA is gravely concerned with implications to life safety should NFPA 101 allow up to two releasing motions to release a door for egress. For example, consider these requirements in NFPA 101:

7.2.1.5.10* A latch or other fastening device on a door leaf shall be provided with a releasing device that has an obvious method of operation and that is readily operated under all lighting conditions.

Allowing up to two releasing motions to release a door for egress, would, from a simplistic perspective, allow additional locking / latching hardware to be installed on the door. Unfortunately, simply allowing additional hardware with one more releasing motion also invites unintended consequences.

Only after appropriate additional requirements which address the questions below are included in NFPA 101 Life Safety Code should the committee consider allowing up to two releasing motions in doors in the means of egress:

- Considering the wide variety of physical and mental abilities of every potential occupant, in every conceivable and inconceivable emergency and non-emergency situation, and in absolute darkness, how can it be assured that each and every potential occupant would know that two releasing motions are required, and be able to accomplish the two releasing motions in order to effect egress?
- If hardware is installed where one releasing motion must occur prior to the second, how can it be assured each occupant will know the required sequence? OR, How can it be assured that not more than two releasing motions are required regardless of the sequence of the motions?

NFPA 5000
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Following 11.2.1.6.2:

11.2.1.6.2.1

The provisions of 11.2.1.6.1 for delayed-egress electrical locking systems and 11.2.1.6.3 for door hardware release of electrically locked egress door assemblies shall not apply to door assemblies with sensor-release of electrical locking systems.

Reason: this proposed language is similar to revised 11.2.1.6.1.2 and proposed 11.2.1.6.3.2. For consistency, this proposed section 11.2.1.6.2.1 should be appended to 11.2.1.6.2.

17.2.2.2.4

(3) The releasing mechanism shall open the door leaf with not more than one releasing ~~operation~~ motion.

Reason:

Consistent with Global FR-8098: "Replace the term 'releasing operation' with 'releasing motion' wherever it appears in Chapter 11 and associated Annex A provisions." the same revisions should be applied to this text.

18.2.2.2.8

(3) The releasing mechanism shall open the door leaf with not more than one releasing ~~operation~~ motion.

Reason:

Consistent with Global FR-8098: "Replace the term 'releasing operation' with 'releasing motion' wherever it appears in Chapter 11 and associated Annex A provisions." the same revisions should be applied to this text.

28.2.2.2.2

(3) The releasing mechanism shall open the door leaf with not more than one releasing ~~operation~~ motion.

Reason:

Consistent with Global FR-8098: "Replace the term 'releasing operation' with 'releasing motion' wherever it appears in Chapter 11 and associated Annex A provisions." the same revisions should be applied to this text.