



Committee Input No. 6544-NFPA 101-2021 [Section No. 7.1.3.2.1]

7.1.3.2.1

Where this *Code* requires an exit to be separated from other parts of the building, the separating construction shall meet the requirements of Section 8.2 and the following:

- (1)* The separation shall have a minimum 1-hour fire resistance rating where the exit connects three or fewer stories.
- (2) The separation specified in 7.1.3.2.1(1), other than an existing separation, shall be supported by construction having not less than a 1-hour fire resistance rating.
- (3)* The separation shall have a minimum 2-hour fire resistance rating where the exit connects four or more stories, unless one of the following conditions exists:
 - (4) In existing non-high-rise buildings, existing exit stair enclosures shall have a minimum 1-hour fire resistance rating.
 - (5) In existing buildings protected throughout by an approved, supervised automatic sprinkler system in accordance with Section 9.7, existing exit stair enclosures shall have a minimum 1-hour fire resistance rating.
 - (6) The minimum 1-hour enclosures in accordance with 28.2.2.1.2, 29.2.2.1.2, 30.2.2.1.2, and 31.2.2.1.2 shall be permitted as an alternative to the requirement of 7.1.3.2.1(3).
- (7) The minimum 2-hour fire-resistance-rated separation required by 7.1.3.2.1(3) shall be constructed of an assembly of noncombustible or limited-combustible materials and shall be supported by construction having a minimum 2-hour fire resistance rating, unless otherwise permitted by 7.1.3.2.1(6).
- (8)* Structural elements, or portions thereof, that support exit components and either penetrate into a fire-resistance-rated assembly or are installed within a fire-resistance-rated wall assembly shall be protected, as a minimum, to the fire resistance rating required by 7.1.3.2.1(1) or 7.1.3.2.1(3).
- (9) Fire-retardant-treated wood enclosed in noncombustible or limited-combustible materials shall be permitted in accordance with NFPA 220.
- (10) Openings in the separation shall be protected by fire door assemblies equipped with door closers complying with 7.2.1.8.
- (11*) Openings in exit enclosures shall be limited to door assemblies for egress from normally occupied spaces and corridors and door assemblies for egress from the enclosure, unless one of the following conditions exists:
 - (12) Vestibules that separate normally unoccupied spaces from an exit enclosure shall be permitted, provided the vestibule is separated from adjacent spaces by corridor walls and related opening protectives as required for the occupancy involved but not less than a smoke partition in accordance with Section 8.4.
 - (13) In buildings of Type I or Type II construction, as defined in NFPA 220 (see 8.2.1.2), fire-protection-rated door assemblies to normally unoccupied building service equipment support areas as addressed in Section 7.14 shall be permitted, provided the space is separated from the exit enclosure by fire barriers as required by 7.1.3.2.1(3).
 - (14) Openings in exit passageways in mall buildings as provided in Chapters 36 and 37 shall be permitted.
 - (15) In buildings of Type I or Type II construction, as defined in NFPA 220 (see 8.2.1.2), existing fire-protection-rated door assemblies to interstitial spaces shall be permitted, provided that such spaces meet all of the following criteria:
 - (16) The space is used solely for distribution of pipes, ducts, and conduits.
 - (17) The space contains no storage.
 - (18) The space is separated from the exit enclosure in accordance with Section 8.3.

(19) Existing openings to mechanical equipment spaces protected by approved existing fire-protection-rated door assemblies shall be permitted, provided that the following criteria are met:

(20) The space is used solely for non-fuel-fired mechanical equipment.

(21) The space contains no storage of combustibile materials.

(22) The building is protected throughout by an approved, supervised automatic sprinkler system in accordance with Section 9.7 or the mechanical equipment space is provided with sprinkler protection in accordance with Section 9.7 and provided with complete smoke detection in accordance with Section 9.6 .

(23) Penetrations into, and openings through, an exit enclosure assembly shall be limited to the following:

(24) Door assemblies permitted by 7.1.3.2.1(8)

(2*) Electrical conduit serving the exit enclosure

(26) Pathways for devices for security and communication systems serving the exit enclosure, where pathways are installed in metal conduit

(27*) Required exit door openings

(28) Ductwork and equipment necessary for independent stair pressurization

(29) Water or steam piping necessary for the heating or cooling of the exit enclosure

(30) Sprinkler piping

(31) Standpipes

(32) Existing penetrations

(33) Penetrations for fire alarm circuits, where the circuits are installed in metal conduit

(34) Penetrations or communicating openings shall be prohibited between adjacent exit enclosures.

(35) All penetrations in fire barriers separating the exit from other parts of the building shall be protected in accordance with 8.3.4.

(36) Membrane penetrations shall be permitted on the exit access side of the exit enclosure and shall be protected in accordance with 8.3.4.7.

Submitter Information Verification

Committee: SAF-MEA

Submittal Date: Fri Jul 09 17:35:23 EDT 2021

Committee Statement

Committee Statement: The committee input only modifies Item (8) by adding the words 'for egress'. Other underlined text is superfluous.

The purpose of this language is to prohibit non-egress compliant door openings such as rolling or sliding fire door assemblies from being installed in exit enclosures. There are emerging trends to use such doors to create exit stairs that are effectively open on one or more sides similar to convenience openings or other architecturally similar openings. Currently these doors may be permitted, as they are doors that open into corridors and/or

occupied spaces, which is technically in line with the existing language despite being expressly against the intent of the code to severely limit the number of openings and penetrations of exit enclosures to those that are essential to their function as an exit. Rolling and sliding fire doors are much more complex than swinging doors, require extensive maintenance to operate properly, and rely on automatic closing devices and interfaces with other building systems to operate; this decrease the likelihood that exit enclosures will maintain their protection when needed most. Additionally, many of these doors may only carry fire protection ratings rather than fire resistance ratings, which poses a potential threat to occupants when they are effectively replacing large portions of the enclosure that would otherwise be comprised of more reliable and more strenuously tested firewalls.

This committee input is intended to solicit public comments and to permit further review by the special purpose horizontally sliding door task group for possible revisions at the second draft stage.

Response CI-6544-NFPA 101-2021
Message:



Committee Input No. 6543-NFPA 101-2021 [Section No. 7.2.1.12]

7.2.1.12 Door Openings in Folding Partitions.

Where permanently mounted folding or movable partitions divide a room into smaller spaces, a swinging door leaf or open doorway shall be provided as an exit access from each such space, unless otherwise specified in 7.2.1.12.1- ~~and~~ , 7.2.1.12.2, and 7.2.1.12.3 .

7.2.1.12.1

A door leaf or opening in the folding partition shall not be required, provided that all of the following criteria are met:

- (1) The subdivided space is not used by more than 20 persons at any time.
- (2) The use of the space is under adult supervision.
- (3) The partitions are arranged so that they do not extend across any aisle or corridor used as an exit access to the required exits from the story.
- (4) The partitions conform to the interior finish and other requirements of this *Code*.
- (5) The partitions are of an approved type, have a simple method of release, and are capable of being opened quickly and easily by experienced persons in case of emergency.

7.2.1.12.2

Where a subdivided space is provided with not less than two means of egress, the swinging door leaf in the folding partition specified in 7.2.1.12 shall not be required, and one such means of egress shall be permitted to be equipped with a horizontal-sliding door assembly complying with 7.2.1.13.

7.2.1.12.3

The swinging door leaf in the folding partition specified in 7.2.1.12 shall not be required where each space is provided with compliant means of egress without requiring travel through the folding partition when in the closed position.

Submitter Information Verification

Committee: SAF-MEA

Submittal Date: Fri Jul 09 17:29:01 EDT 2021

Committee Statement

Committee Statement: This committee input is intended to address the need for a door in a folding partition when no such door would otherwise be needed if the folding partition were a solid wall. The question arose from the NFPA technical question service as follows:

Question: I am designing a facility that is a business occupancy, primarily used for classrooms and labs (for people over the age of 18) of less than 50 occupants each. As part of the space planning there are two adjacent training labs with a calculated occupant load of 23 occupants each. In lieu of a shared wall between these two labs there is a permanently mounted folding partition that allows the lab to function as a single large lab with 46 occupants. This folding partition cannot have a door leaf installed or opening provided within it and must span the length of the shared wall between the two labs. The individual labs are used by more than 20 occupants and therefore cannot meet all the criteria to omit the door leaf within the folding partition as permitted by 7.2.1.12.1.

Because the folding partition cannot have a door/opening per 7.2.1.12 and 7.2.1.12.1 cannot be met, must the requirement of 7.2.1.12.2 be met, which would require two means of egress be provided from each lab, i.e. four door leaves across the two lab spaces (even though if there were no partition at all between the labs this would only require a single means of egress and if the labs were separated by a permanent partition each lab would only require a single means of egress)?

NFPA Staff Answer: The requirements of 7.2.1.12 are somewhat archaic, dating back to the 1960s, and they haven't been revised to my knowledge in over 20 years. 7.2.1.12.1 was originally written to apply to spaces in which a folding partition would render a portion of the space with no means of egress, other than through the required door in the partition. This became less clear in the 2000 edition, although no technical change was intended. The provision of 7.2.1.12.2 first appeared in the 1988 edition of the Code. From the technical committee documentation, it appears that it was intended to apply to large rooms with at least two means of egress such that when the partition is closed, each smaller room has at least one means of egress. For the arrangement you describe, as long as common path of travel limits from each space are not exceeded when the partition is closed, it should be acceptable with no door in the folding partition.

Response CI-6543-NFPA 101-2021
Message:



Committee Input No. 6515-NFPA 101-2021 [Sections 7.2.12.2.5, 7.2.12.2.6]

Sections 7.2.12.2.5, 7.2.12.2.6

7.2.12.2.5

The area of refuge shall be provided with a two-way communication system for communication between the area of refuge and a central control point.

7.2.12.2.6

Newly installed two-way communication systems shall be listed in accordance with UL 2525.

7.2.12.2.7

The door opening to the stair enclosure or the elevator door and the associated portion of the area of refuge that the stair enclosure door opening or elevator door serves shall be identified by signage. (See 7.2.12.3.5.)

7.2.12.2.6 8 *

Instructions for summoning assistance, via the two-way communication system, and written identification of the area of refuge location shall be posted adjacent to the two-way communication system.

Submitter Information Verification

Committee: SAF-MEA

Submittal Date: Thu Jul 08 17:09:05 EDT 2021

Committee Statement

Committee Statement: This committee input seeks to require newly installed two-way communication systems to comply with the applicable product listing standard. Two-way communication systems are intended to allow occupants in need of assistance to evacuate a building to areas of safety. These systems must work correctly when they are needed in an emergency condition. UL 2525 is a new Product Standard for products intended to be used in combination with other devices to form a rescue assistance two-way emergency communication system. The CI is intended to solicit public comments and give the committee the opportunity to review the new product standard.

Response Message: CI-6515-NFPA 101-2021

Public Input No. 217-NFPA 101-2021 [Sections 7.2.12.2.5, 7.2.12.2.6]



Committee Input No. 6545-NFPA 101-2021 [Section No. 7.7.2]

7.7.2 Exit Discharge Through Interior Building Areas.

Exits shall be permitted to discharge through interior building areas, provided that all of the following are met:

- (1) Not more than 50 percent of the required number of exit stairs serving normally occupied areas of each floor, and not more than 50 percent of the exit stair capacity required for normally occupied areas of each floor, shall discharge through areas on any level of discharge, except as otherwise permitted by one of the following:
 - (2) One hundred percent of the exits shall be permitted to discharge through areas on any level of discharge in detention and correctional occupancies as otherwise provided in Chapters 22 and 23 .
 - (3) In existing buildings, the 50 percent limit on egress capacity shall not apply if the 50 percent limit on the required number of exits is met.
 - (4) Not more than 75 percent of the required number and capacity of exit stairs serving normally occupied areas of each floor shall be permitted to discharge through vestibules or foyers on any level of discharge where the level of discharge is protected throughout by an approved automatic sprinkler system in accordance with Section 9.7 and such vestibules or foyers meet the requirements of 7.7.2(3)(b).
- (5) Each level of discharge shall discharge directly outside at the finished ground level or discharge directly outside and provide access to the finished ground level by outside stairs or outside ramps.
- (6) The interior exit discharge shall
~~lead to a free and unobstructed way to the exterior of the building, and such way shall be~~
~~readily apparent or shall be identifiable by exit signage from the point of discharge from the exit.~~
~~The interior exit discharge shall be~~
- (7) protected by one of the following methods:
 - (a) The level of discharge shall be protected throughout by an approved automatic sprinkler system in accordance with
~~Section-~~
- (8) Section 9.7 , or the portion of the level of discharge used for interior exit discharge shall be protected by an approved automatic sprinkler system in accordance with
~~Section-~~
- (9) Section 9.7 and shall be separated from the nonsprinklered portion of the floor by fire barriers with a fire resistance rating
meeting the requirements for the enclosure of exits. (See 7.1.3.2.1 .)
 - (b) The interior exit discharge area shall be in a vestibule or foyer that meets all of the following criteria:
 - i. The depth from the exterior of the building shall be not more than 10 ft (3050 mm), and the length shall be not more than 30 ft (9
4 m
- (10) 1 m).
 - ii. The foyer shall be separated from the remainder of the level of discharge by fire barriers with a minimum 1-hour fire resistance rating, and existing installations of wired glass in steel frames shall be permitted to be continued in use.

iii. The foyer shall serve only as means of egress and shall include an exit directly to the outside.

- (11) The interior exit discharge shall lead to a free and unobstructed way to the exterior of the building, and such way shall be readily apparent or shall be identifiable by exit signage from the point of discharge from the exit.
- (12) The entire area on the level of discharge shall be separated from areas below by construction having a fire resistance rating not less than that required for the exit enclosure, unless otherwise provided in 7.7.2(6).
- (13) Levels below the level of discharge in an atrium shall be permitted to be open to the level of discharge where such level of discharge is protected in accordance with 8.6.7.

Submitter Information Verification

Committee: SAF-MEA

Submittal Date: Fri Jul 09 17:41:37 EDT 2021

Committee Statement

Committee Statement: The purpose of this committee input is to allow a new scenario to increase the number and capacity of exit stairs on the level of exit discharge from 50% to 75% under certain very specific conditions without reducing the level of safety currently provided by the Code.

Currently, 50% credit is given to stairs that discharge to building interiors in sprinklered buildings or stairs that discharge into compliant vestibules in non-sprinklered buildings. This revision would permit compliant vestibules (i.e., those that meet the three existing requirements for vestibules – 10' x 30', 1 hr enclosure, direct egress) additional credit in buildings where the level of exit discharge is completely sprinklered. Note: compliant vestibules already would meet 100% of the discharge requirements if installed in non-sprinklered buildings less than 4 stories in height (since they require 1 hr enclosures) or in existing sprinklered buildings (since 7.1.3.2.1(3) permits 1 hr exit enclosures). Reordering (3) and (4) better introduces interior exit discharge.

This concept was accepted by this committee during the 1st draft meeting last cycle and text inserted into the 1st draft of the 2021 Code, but was rightfully removed during the 2nd draft meeting because after subsequent review, the text as written created potential problems. This committee input addresses those problems and presents the concept again, and is intended to solicit public comments for further review at the second draft stage.

Response Message: CI-6545-NFPA 101-2021