Public Input No. 12-NFPA 17A-2021 [Section No. 2.3.1]

2.3.1 UL Publications.

Underwriters Laboratories Inc., 333 Pfingsten Road, Northbrook, IL 60062-2096.

~~UL 300~~ CAN/UL/ULC 300 , *Fire Testing of Fire Extinguishing Systems for Protection of Commercial Cooking Equipment*, 2019.

~~UL 1254~~ CAN/UL/ULC 1254 , *Pre-Engineered Dry and Wet Chemical Extinguishing System Units*, ~~2019~~ 2020 .

Statement of Problem and Substantiation for Public Input

Standards updated to the latest edition and they have become bi-national standards.

Submitter Information Verification

Submitter Full Name: Kelly Nicolello
Organization: UL LLC
Street Address:
City:
State:
Zip:
Submittal Date: Mon May 31 10:38:47 EDT 2021
Committee: DRY-AAA

Committee Statement

Resolution: FR-17-NFPA 17A-2021
Statement: Reference updates. Please see attached word document for proposed changes.

Public Input No. 7-NFPA 17A-2021 [Sections 4.4.3.3, 4.4.3.4, 4.4.3.5]

Sections 4.4.3.3, 4.4.3.4, 4.4.3.5

~~**4.4.3.3** –~~

~~All manual actuators shall be provided with operating instructions.~~

~~**4.4.3.4** –~~

~~These instructions shall be permitted to include the use of pictographs and shall have lettering at least **1**⁄**4** in. (6.35 mm) in height.~~

~~**4.4.3.5** –~~

~~All readily accessible manual operating devices shall identify the hazards they protect.~~

Statement of Problem and Substantiation for Public Input

This language is redundant since it, or similar language, is found in 5.2.1.10.
See related PI to 5.2.1.10.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 8-NFPA 17A-2021 [New Section after 5.2.1.10.2]	

Submitter Information Verification

Submitter Full Name: David de Vries
Organization: Firetech Engineering Inc.
Street Address:
City:
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Submittal Date: Thu May 27 17:23:56 EDT 2021
Committee: DRY-AAA

Committee Statement

Resolution: FR-7-NFPA 17A-2021

Statement: The language in 4.4.3.3, 4.4.3.3.1, and 4.4.3.3.2 is appropriate in the component chapter. Language in 4.4.3.5 is redundant since similar language is found in 5.2.1.10, and more appropriate in the installation chapter. 4.4.3.4 was split into two parts and renumbered to comply with the Manual of Style.

Public Input No. 3-NFPA 17A-2021 [Chapter 5 [Title Only]]

~~System Requirements~~ Systems for the Protection of Commercial Cooking Operations

Statement of Problem and Substantiation for Public Input

Chapter 6 addresses mobile equipment and chapter 5 addresses commercial cooking. The title of chapter 5 should be updated to match the content.

Submitter Information Verification

Submitter Full Name: Mark Conroy
Organization: Brooks Equipment Company
Street Address:
City:
State:
Zip:
Submittal Date: Tue Apr 13 13:31:03 EDT 2021
Committee: DRY-AAA

Committee Statement

Resolution: FR-12-NFPA 17A-2021
Statement: Chapter 6 addresses mobile equipment and chapter 5 addresses commercial cooking. The title of chapter 5 should be updated to match the content.

Public Input No. 13-NFPA 17A-2021 [Section No. 5.1 [Excluding any Sub-Sections]]

Wet chemical fire-extinguishing systems for the protection of cooking operations shall be listed and shall meet or exceed the requirements of ~~UL 1254~~ CAN/UL/ULC 1254 , *Pre-Engineered Dry and Wet Chemical Extinguishing System Units*, and ~~UL 300~~ CAN/ULULC 300 , *Fire Testing of Fire Extinguishing Systems for Protection of Commercial Cooking Equipment*.

Statement of Problem and Substantiation for Public Input

Standards updated to the latest edition and they have become bi-national standards.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 12-NFPA 17A-2021 [Section No. 2.3.1]	
Public Input No. 14-NFPA 17A-2021 [Section No. C.1]	
Public Input No. 15-NFPA 17A-2021 [Section No. D.1.2.2]	

Submitter Information Verification

Submitter Full Name: Kelly Nicolello
Organization: UL LLC
Street Address:
City:
State:
Zip:
Submittal Date: Mon May 31 10:44:59 EDT 2021
Committee: DRY-AAA

Committee Statement

Resolution: FR-1-NFPA 17A-2021
Statement: Revised to reflect that these standards are now bi-national standards and should be referenced as such throughout the document. It is not accurate to change the instances of UL 300A.

Public Input No. 8-NFPA 17A-2021 [New Section after 5.2.1.10.2]

5.2.1.10.2.1

These instructions shall be permitted to include use of pictographs and shall have lettering at least 1/4 in. (6.35 mm)in height.

Statement of Problem and Substantiation for Public Input

This simply relocates language from 4.4.3.4 to follow the requirement for instructions in 5.2.1.10.2.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 7-NFPA 17A-2021 [Sections 4.4.3.3, 4.4.3.4, 4.4.3.5]	relocated text

Submitter Information Verification

Submitter Full Name: David de Vries
Organization: Firetech Engineering Inc.
Street Address:
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Submittal Date: Thu May 27 17:28:31 EDT 2021
Committee: DRY-AAA

Committee Statement

Resolution: FR-23-NFPA 17A-2021

Statement: The language in 5.2.1.10.2 was updated to reflect a proposed change to the language in the next edition of NFPA 96. The language in 5.2.1.10.2.1 and 5.2.1.10.2.2 was separated into two requirements to comply with the manual of style. The language is important to include within the installation chapter to ensure a proper installation.

Public Input No. 16-NFPA 17A-2021 [Section No. 5.6]

5.6 ~~Special Requirements~~ **Fire-Extinguishing Equipment for Commercial Cooking Equipment** .

5.6.1

Systems protecting two or more hoods or plenums, or both, that meet the requirements of 5.1.2.2 shall be installed to ensure the simultaneous operation of all systems protecting the hoods, plenums, and associated cooking appliances located below the hoods.

5.6.1.1

The building owner(s) or the owner's agent shall be responsible for the protection of any common exhaust ducts used by more than one tenant.

5.6.1.2

The tenant shall be responsible for the protection of common exhaust duct(s) serving hoods located within the tenant's space and up to the point of connection to the building owner's common exhaust duct.

5.6.1.3

The tenant's common duct shall be considered a branch duct to the building owner's common duct.

5.6.1.4

At least one fusible link or heat detector shall be installed within each exhaust duct opening in accordance with the manufacturer's listing.

5.6.1.5

Other than appliances that use a downdraft ventilation system, a fusible link or heat detector shall be provided above each protected appliance or in accordance with the extinguishing system manufacturer's design, installation, and maintenance manual.

5.6.1.5.1

Appliances that use a downdraft ventilation system shall be provided with a fusible link or heat detector for each protected cooking appliance located in the plenum area or in accordance with the extinguishing system manufacturer's design, installation, and maintenance manual.

5.6.1.5.2

Fusible links or heat detectors located at or within 12 in. (305 mm) into the exhaust duct opening and above the protected appliance shall be permitted to meet the requirements of 5.6.1.5.

5.6.1.5.3

The maximum distance between detection devices shall not exceed 36 in. (914 mm) unless permitted by the manufacturer's design, installation, and maintenance manual.

5.6.1.5.4

A single listed detection device shall be permitted for more than one appliance when installed in accordance with the system's listing.

5.6.1.6

Where the pipe or other conduit penetrates a duct or hood, the penetration shall have a liquidtight continuous external weld or shall be sealed by a listed device.

5.6.2 Protection of Common Exhaust Duct.

5.6.2.1

Common exhaust ducts shall be protected by one of the following methods:

(1) * Simultaneous operation of all independent hood, duct, and appliance protection systems

(2) * Simultaneous operation of any hood, duct, and appliance protection system and the system(s) protecting the entire common exhaust duct

5.6.2.1.1

A fusible link or other mechanically operated heat detection device from the common duct fire-extinguishing system shall be located at each branch-duct to common-duct connection where electrical operation of the common duct fire-extinguishing system does not meet the requirements of 5.3.1.

5.6.2.1.2

Where a fusible link or mechanically operated heat detector is located at a branch-duct to common-duct connection, an access panel shall be installed in accordance with NFPA 96 to enable servicing of the detector where the detector is not accessible from the branch duct connection to the exhaust hood.

5.6.2.2

All sources of fuel or heat to appliances served by the common exhaust duct shall be shut down upon actuation of any protection system in accordance with 4.4.4.

5.6.3*

Ignition sources contained within any exhaust system shall be protected and have a separate detection system that is in accordance with the manufacturer’s specifications and that is approved by the authority having jurisdiction.

5.6.3.1

Either a common extinguishing system shall be provided to protect both the ignition source(s) contained within an exhaust system and the exhaust system itself, or separate extinguishing systems shall be provided to protect the exhaust system and the ignition sources which shall be arranged for simultaneous automatic operation upon actuation of any one of those systems.

5.6.3.1.1

Any equipment installed in the path of exhaust products that provides secondary filtration or air pollution control shall be provided with an approved automatic fire-extinguishing system, installed in accordance with the fire-extinguishing system manufacturer’s instructions. [**96:**9.3.3]

5.6.4*

Movable cooking equipment shall be provided with a means to ensure that it is correctly positioned in relation to the appliance discharge nozzle during cooking operations.

Statement of Problem and Substantiation for Public Input

The title “Special Requirements” is not reflective of the criteria covered in this section, which all relates to protecting commercial cooking operations. The suggested title better reflects what is covered by this section, and relates to the criteria in NFPA 96, Chapter 10.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 17-NFPA 17A-2021 [New Section after 8.4]	

Submitter Information Verification

Submitter Full Name: Kelly Nicolello

Organization: UL LLC
Street Address:
City:
State:
Zip:
Submittal Date: Mon May 31 14:56:41 EDT 2021
Committee: DRY-AAA

Committee Statement

Resolution: The title of Chapter 5 was changed, which satisfies the intent of this input.

Public Input No. 1-NFPA 17A-2021 [Section No. 6.3.5.9]

6.3.5.9

Upon actuation of an automatic fire-extinguishing system, an audible alarm or visual indicator shall be provided to show that the system has ~~activated~~ actuated . [**96:**10.6.1]

Statement of Problem and Substantiation for Public Input

This proposed change is editorial. This paragraph references NFPA 96:10.6.1 which uses the word "actuated".

Submitter Information Verification

Submitter Full Name: Mark Conroy
Organization: Brooks Equipment Company
Street Address:
City:
State:
Zip:
Submittal Date: Fri Feb 26 12:41:30 EST 2021
Committee: DRY-AAA

Committee Statement

Resolution: FR-4-NFPA 17A-2021
Statement: This proposed change is editorial. This paragraph references NFPA 96:10.6.1 which uses the word "actuated".

Public Input No. 2-NFPA 17A-2021 [Section No. 6.3.7.6]

6.3.7.6

Wet chemical containers and expellant gas assemblies shall be located per the manufacturer's limitations where they will not be exposed to the fire in the protected area or otherwise rendered inoperable by mechanical damage~~, unless approved by the authority having jurisdiction~~ .

Statement of Problem and Substantiation for Public Input

This paragraph should match 5.4.6.

Submitter Information Verification

Submitter Full Name: Mark Conroy
Organization: Brooks Equipment Company
Street Address:
City:
State:
Zip:
Submittal Date: Fri Feb 26 12:45:34 EST 2021
Committee: DRY-AAA

Committee Statement

Resolution: FR-5-NFPA 17A-2021
Statement: This requirement should be updated to match 5.4.6.

Public Input No. 10-NFPA 17A-2021 [Section No. 7.3.4]

7.3.4

Information shall be submitted pertaining to the following:

(1) The location and function of detection devices and manual actuators

(2) Operating devices

(3) Auxiliary equipment

(4) Electrical circuitry

Statement of Problem and Substantiation for Public Input

The standard requires at least one manual actuator to be located "in the path of egress or at a location acceptable to the AHJ." Requiring that their location be shown on the plans allows the AHJ to approve that position prior to seeing the device installed and perhaps requiring its relocation.

Submitter Information Verification

Submitter Full Name: David de Vries
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Submittal Date: Thu May 27 17:39:39 EDT 2021
Committee: DRY-AAA

Committee Statement

Resolution: FR-9-NFPA 17A-2021

Statement: The standard requires at least one manual actuator to be located "in the path of egress or at a location acceptable to the AHJ." Requiring that their location be shown on the plans allows the AHJ to approve that position prior to seeing the device installed and perhaps requiring its relocation.

Public Input No. 11-NFPA 17A-2021 [Section No. 7.4.7]

7.4.7 Review of Manual ~~Release Devices~~ Actuators .

Verification that all manual ~~devices (manual pull stations)~~ actuators are readily accessible and accurately identified shall be required.

Statement of Problem and Substantiation for Public Input

Elsewhere in the standard devices that manually actuate the system are called manual actuators. Changing the language here is for consistency.

Submitter Information Verification

Submitter Full Name: David de Vries
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City:
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Submittal Date: Thu May 27 17:44:08 EDT 2021
Committee: DRY-AAA

Committee Statement

Resolution: FR-3-NFPA 17A-2021
Statement: Elsewhere in the standard, devices that manually actuate the system are called manual actuators. Changing the language here is for consistency.

Public Input No. 5-NFPA 17A-2021 [Section No. 8.1]

8.1– * General.

The responsibility for inspection, testing, maintenance, and recharging of the fire protection system shall ultimately be that of the owner(s) of the system, provided that this responsibility has not been transferred in written form to a management company, tenant, or other similar party.

Statement of Problem and Substantiation for Public Input

This provision specifies who is responsible for the inspection, testing and maintenance of the extinguishing system. Typically, that would be the owner of the system, but when the owner does not have access to the system on a regular basis, the responsibility then falls to another party, such as a tenant via a lease or a management firm via a contract. Installers and maintainers of extinguishing systems, who have access only when called, or have a contract for semi-annual services, do not have the regular access to perform the monthly inspections required of the owner or responsible party, nor the authority to take corrective action if deficiencies are found. Adding the word "similar" clarifies that the responsible party is one with regular, if not day-to-day, access to the system via a written agreement.
See related PI Annex note, A.8.1,

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 6-NFPA 17A-2021 [New Section after A.7.4.10.3]	

Submitter Information Verification

Submitter Full Name: David de Vries
Organization: Firetech Engineering Inc.
Street Address:
City:
State:
Zip:
Submittal Date: Thu May 27 17:02:00 EDT 2021
Committee: DRY-AAA

Committee Statement

Resolution: CI-14-NFPA 17A-2021
Statement: The committee created a committee input and is soliciting further input on this topic.

Public Input No. 9-NFPA 17A-2021 [Section No. 8.3.4 [Excluding any Sub-Sections]]

Fixed temperature-sensing elements of the fusible metal alloy-type ~~or glass bulb-type~~ shall be replaced at least semiannually from the date of installation or more frequently, if necessary, and shall be destroyed when removed.

Statement of Problem and Substantiation for Public Input

Glass bulbs that are properly rated for their exposed temperature do not have the characteristic of solder creep associated with fusible metal alloy links and if they can be cleaned per 8.3.5, there is no need to replace them semi-annually.

Submitter Information Verification

Submitter Full Name: David de Vries
Organization: Firetech Engineering Inc.
Street Address:
City:
State:
Zip:
Submittal Date: Thu May 27 17:34:24 EDT 2021
Committee: DRY-AAA

Committee Statement

Resolution: It is almost impossible to clean these devices, therefore glass-bulb elements should be replaced and not cleaned semi-annually.

Public Input No. 17-NFPA 17A-2021 [New Section after 8.4]

8.4* Fire-Extinguishing Equipment for Commercial Cooking Equipment

Fire-extinguishing equipment for commercial cooking equipment shall be inspected, tested and maintained in accordance with NFPA 96.

A.8.4

NFPA 96 (Section 12.2) includes requirements for the inspection, testing and maintenance of fire-extinguishing systems using in commercial cooking operations that should supplement the inspection testing and maintenance requirements in this standard.

Statement of Problem and Substantiation for Public Input

: NFPA 96, Section 12.2 has inspection, testing and maintenance requirements for fire extinguishing systems used in commercial cooking operations. This proposal provides a link to those requirements, and includes an informative annex note.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 16-NFPA 17A-2021 [Section No. 5.6]	

Submitter Information Verification

Submitter Full Name: Kelly Nicolello
Organization: UL LLC
Street Address:
City:
State:
Zip:
Submittal Date: Mon May 31 14:59:22 EDT 2021
Committee: DRY-AAA

Committee Statement

Resolution: Chapter 8 of NFPA 17A covers inspection, testing, and maintenance of these systems.

Public Input No. 6-NFPA 17A-2021 [New Section after A.7.4.10.3]

A.8.1

This provision specifies who is responsible for the inspection, testing and maintenance of the extinguishing system. Typically, that would be the owner of the system, but when the owner does not have access to the system on a regular basis, the responsibility then falls to another party, such as a tenant via a lease or a management firm via a contract. Installers and maintainers of extinguishing systems, who have access only when called, or have a contract for semi-annual services, do not have the regular access to perform the monthly inspections required of the owner or responsible party, nor the authority to take corrective action if deficiencies are found.

Statement of Problem and Substantiation for Public Input

See statement accompanying PI No. 5.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 5-NFPA 17A-2021 [Section No. 8.1]	related material

Submitter Information Verification

Submitter Full Name: David de Vries
Organization: Firetech Engineering Inc.
Street Address:
City:
State:
Zip:
Submittal Date: Thu May 27 17:18:31 EDT 2021
Committee: DRY-AAA

Committee Statement

Resolution: CI-14-NFPA 17A-2021
Statement: The committee created a committee input and is soliciting further input on this topic.

Public Input No. 4-NFPA 17A-2021 [Chapter B]

~~**Annex B** – Vehicle Fire Suppression Systems~~

~~*This annex is not a part of the requirements of this NFPA document but is included for informational purposes only.*~~

~~**B.1** –~~

~~Only pre-engineered wet chemical systems, including detection systems that have been listed for such use, should be used for vehicle fire suppression systems and should not include cooking appliances inside the vehicle.~~

~~**B.2** –~~

~~Compartments or areas that could be subject to fire should be protected in accordance with the manufacturer's design, installation, and maintenance manual.~~

~~**B.3** –~~

~~Each protected compartment or area should be provided with a listed fire detection device specified in the manufacturer's design, installation, and maintenance manual to automatically actuate the extinguishing system.~~

~~**B.4** –~~

~~Manual actuation should be permitted to be provided only if acceptable to the authority having jurisdiction.~~

~~**B.5** –~~

~~Only the flexible hose and hose fittings specified in the manufacturer's design, installation, and maintenance manual should be used.~~

~~**B.6** –~~

~~All discharge nozzles should be located to minimize the likelihood of damage or misalignment and within the limitations and constraints of the manufacturer's design, installation, and maintenance manual.~~

~~**B.7** –~~

~~Location of agent containers, expellant gas cartridges or cylinders, and a manual actuator station(s) should be appropriate to each application, protected against physical damage, and accessible.~~

~~**B.8** –~~

~~At least one easily accessible manual actuator or operating device should be provided for use by the equipment operator.~~

~~**B.9** –~~

~~An additional manual actuator or operating device should be located, if practical, so that it is in the path of egress and operable from the ground level.~~

~~**B.10** –~~

~~If the system is provided with a discharge delay device, both audible and visual alarms should be provided to warn of impending system discharge.~~

~~**B.11** –~~

~~In the event of system discharge, the vehicle being protected should not be returned to service until the system is recharged and operational.~~

Statement of Problem and Substantiation for Public Input

Annex B was added to the 2017 edition of 17A for information only and as a placeholder while language was developed to incorporate into the body of the standard. That was accomplished in the last revision and became Chapter 6 in the 2021 edition, making Annex B unnecessary and, potentially, even in conflict with the new Chapter 6. Annex B should be deleted and the remaining Annexes designated accordingly.

Submitter Information Verification

Submitter Full Name: David de Vries
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Submittal Date: Thu May 27 16:22:16 EDT 2021
Committee: DRY-AAA

Committee Statement

Resolution: FR-6-NFPA 17A-2021
Statement: Annex B was added to the 2017 edition of 17A for information only and as a placeholder while language was developed to incorporate into the body of the standard. That was accomplished in the last revision and became Chapter 6 in the 2021 edition, making Annex B unnecessary and, potentially, even in conflict with the new Chapter 6. Annex B should be deleted and the remaining Annexes designated accordingly.

Public Input No. 14-NFPA 17A-2021 [Section No. C.1]

C.1

Only pre-engineered wet chemical extinguishing systems, including piping and detection, that have been listed by a nationally recognized testing laboratory to ~~UL 300,~~ CAN/UL/ULC 1254, *Pre-Engineered Dry and Wet Chemical Extinguishing System Units* , and CAN/UL/ULC 300, *Fire Testing of Fire Extinguishing Systems for Protection of Commercial Cooking Equipment*, or ~~UL 300A~~ CAN/UL/ULC 300A , *Outline of Investigation for Extinguishing System Units for Residential Range Top Cooking Surfaces*, should be installed to protect residential stoves where used in other than commercial cooking operations.

Statement of Problem and Substantiation for Public Input

Standards updated to the latest edition and they have become bi-national standards. Added CAN/UL/ULC 1254 to the annex to further explain its use.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 12-NFPA 17A-2021 [Section No. 2.3.1]	
Public Input No. 13-NFPA 17A-2021 [Section No. 5.1 [Excluding any Sub-Sections]]	
Public Input No. 15-NFPA 17A-2021 [Section No. D.1.2.2]	

Submitter Information Verification

Submitter Full Name: Kelly Nicolello
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Zip:
Submittal Date: Mon May 31 10:47:49 EDT 2021
Committee: DRY-AAA

Committee Statement

Resolution: FR-1-NFPA 17A-2021
Statement: Revised to reflect that these standards are now bi-national standards and should be referenced as such throughout the document. It is not accurate to change the instances of UL 300A.

Public Input No. 15-NFPA 17A-2021 [Section No. D.1.2.2]

D.1.2.2 UL Publications.

Underwriters Laboratories Inc., 333 Pfingsten Road, Northbrook, IL 60062-2096.

~~UL 300~~ CAN/UL/ULC 300 , *Fire Testing of Fire Extinguishing Systems for Protection of Commercial Cooking Equipment*, 2019.

UL 300A, *Outline of Investigation for Extinguishing System Units for Residential Range Top Cooking Surfaces*, 2006.

CAN/UL/ULC 1254, Pre-Engineered Dry and Wet Chemical Extinguishing System Units, 2000.

Statement of Problem and Substantiation for Public Input

Standards updated to the latest edition and they have become bi-national standards and added CAN/UL/ULC 1254 to the annex, which would list it as an informational reference..

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 12-NFPA 17A-2021 [Section No. 2.3.1]	
Public Input No. 13-NFPA 17A-2021 [Section No. 5.1 [Excluding any Sub-Sections]]	
Public Input No. 14-NFPA 17A-2021 [Section No. C.1]	

Submitter Information Verification

Submitter Full Name: Kelly Nicolello
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City:
State:
Zip:
Submittal Date: Mon May 31 10:50:01 EDT 2021
Committee: DRY-AAA

Committee Statement

Resolution: FR-1-NFPA 17A-2021
Statement: Revised to reflect that these standards are now bi-national standards and should be referenced as such throughout the document. It is not accurate to change the instances of UL 300A.