

EPWOG Fire Protection Subgroup
Telecon Meeting Minutes, January 24, 2007

A telephone conference call was conducted on January 24, 2007 from 1100 until approximately 1300 Mountain Time with fire protection personnel from Department of Energy (DOE) sites across the country. The purpose of the call was to discuss agenda items described below. One additional discussion point (10 CFR 851 roundtable status/issues) was identified and added to the agenda. Participants are listed at the end of these minutes.

The following Action Items were identified in the course of teleconference business:

- A. Update Authority Having Jurisdiction (AHJ) benchmarking template/instructions to include space for reporting program documentation (e.g. contract only, contractor written program) and comments of interest. Distribute to members upon update. **(Gosswiller)**
- B. Develop and distribute lines of inquiry associated with Fire Hazards Analysis (FHA) Tool Box/Reference Shelf initiative. **(Gosswiller)**
- C. Transmit site specific review comments on DOE G 420.1-3 to Jim Bisker by end of week. **(all)**
- D. Compile and distribute summary fire protection subgroup comments on DOE G 420.1-3. **(Gosswiller)**

AGENDA COVERED

Time (PM MST)	Activity
11:00	Assemble
11:00-11:10	Welcome/Introductions
11:10 -11:20	Round table discussion on AHJ Benchmarking initiative
11:20 – 11:35	Round table discussion on FHA Tool Box initiative
11:35 – 12:10	Round table discussion on 10 CFR 851 implementation status and issues
12:10 – 12:55	Review of DOE G 420.1-3
12:55 – 13:00	Status of DOE Fire Safety Workshop/Wrap Up

MINUTES

The following minutes recap the agenda items covered:

1. Welcome/Introductions

Everyone was announced and welcomed as they entered the conference call. Eric Gosswiller reviewed the list of participants prior to starting the conference. The agenda was then reviewed. Bob Bisker requested that a round table discussion on the status and issues associated with 10 CFR 851 implementation be added to the agenda. The proposed addition was agreed upon and added.

2. AHJ Benchmarking Initiative

Eric Gosswiller identified that to date he had received AHJ benchmarking feedback from the Washington Treatment Project and Yucca Mountain. The objectives of the initiative were discussed and identified as (1) providing a comparative list of the various fire protection AHJ delegation practices and responsibilities across the complex, (2) feedback will support larger AHJ benchmarking initiative being addressed by the Engineering Practices Work Group. At this time, initiative is limited to bench marking but may be refined to include further scope at a later date. The information will allow the various members to compare processes and facilitate the coordination/conversation of similar items of interest. Additional information was identified as being appropriate for inclusion in the information request template (See Action A).

3. FHA Toolbox Initiative

The group discussed potential materials that would be candidate for inclusion in the fire hazards analysis toolbox. There was some discussion regarding what constituted a “tool” (e.g. CFAST and related models). As such products are readily available, it was clarified that the focus is the identification of unique research, studies, fire testing reports, etc. and sharing the existence of associated materials for the mutual benefit of the contractor community. Bruce Campbell indicated that Hughes Associates Inc. has numerous relevant products that have been produced for DOE and its contractors in the past. Some may be available at the HAI webpage or related DOE web sites. Eric Gosswiller will coordinate with Jim Bisker and determine the appropriate mechanism (DOE or EFCOG website) for posting the end product. An initial questionnaire designed to solicit contractor feedback on viable reference materials will be developed and distributed (See Action B).

4. 10 CFR 851 Roundtable Discussion

The group spent approximately 30 minutes sharing the current status of 10 CFR 851 planning activities and current issues. The processing of variance requests, increased legal and management focus and direction as the enforcement date approaches, and remaining unknowns associated with the ultimate enforcement climate were noted concerns.

5. DOE G 420.1-3 Review

The group reviewed the latest draft of DOE G 420.1-3 in an effort to identify any remaining consensus comments on the document. Fluor Hanford had prepared initial review comments and agreed to share those with the group for consideration. It was established that each contractor would submit individual comments and that the EFCOG fire protection subgroup would review would focus on the identification of any significant, consensus comments. A draft summary of EFCOG comments will be distributed for review prior to transmittal to DOE (Actions C and D).

Significant comments included:

1. The inclusion of principal definitions was considered a necessary improvement to the document to support and clarify intent of related guide elements. The suggested definitions recommended by Fluor Hanford were considered appropriate.
2. The inclusion of the concept of “deviation” as identified in DOE-STD-1066, in applicable sections (references and 3.4.5, 3.16.). Deviations should as presented in this guide in same context as identified in DOE-STD-1066 definition for “acceptable”. There are two suggested alternatives..... (1) specifically include as standalone definition and include anywhere “equivalencies” are addressed (e.g. equivalencies and deviations) or (2) expand the definition of equivalencies to include the intent of deviation. The end result is that the AHJ should be permitted to approve an alternate method provided the method demonstrates “equivalent” protection to that specified by a code or standard, or as necessary in some cases, the method deviates (plus or minus) from a code or standard as necessary and yet adequately protects against the inherent fire hazards.

3. There were several members that expressed concern with the language of Section 3.4.3 regarding conflicting language regarding the adoption of regional building codes, in many cases, also requiring adoption of additional ICodes (e.g. International Fire Code). There are two principal concerns:
 - Where state law adopts the International Building Code and the International Fire Code, several members questioned the viability and necessity of DOE fire protection program guidance mandating adoption of alternate NFPA codes and standards (e.g. NFPA 1, NFPA 30) in conflict with the regional requirements. Adoption of the regional approach at an individual site should be permitted subject to AHJ concurrence. The alternate documents to those formally adopted (e.g. NFPA 1 or IFC) should be considered recommended practices or candidate alternate methods.
 - Further, if the local AHJ concurs with the site's established program adoption (by contract or other means) of regional codes and standards, it seems unnecessary to require the documentation of associated deviations and conflicts between NFPA and ICode criteria in affected construction documents and AHJ concurrence on a case by case basis. It is recommended that the language be modified to require AHJ concurrence of site fire protection code and standard adoption. It is strongly recommended that associated language requiring documentation and AHJ approval of deviations between NFPA and ICode criteria within individual construction documents be deleted. This is considered a resource intensive requirement with little realized value.
4. Section 3.5.2 : Add code "interpretations" to Hanford's suggested inclusion of examples of AHJ activities that may be delegated.
5. Section 3.16.1: Should be modified to address deviation introduced in first sentence. Suggested change is as follows: "...and second, a deviation, alternative method or an equivalency to a requirement(s) of a standard or other document should follow the AHJ acceptance provisions explicitly set forth in those documents."
6. Section 3.17: There was consensus that Fluor Hanford's submitted changes on transitional facilities should be incorporated as value added. The traditional guidance defining what facilities satisfy the risk threshold necessary to warrant an FHA would indicate that many facilities that placed in cold dark or dry status and ultimately D&D'd would not have an associated transitional FHA. That said, a fire protection engineering evaluation is still warranted to ensure appropriate fire protection provisions are identified to afford reasonable and necessary protection through the remaining life cycle of the facilities. Historically, a facility fire protection assessment would be applied, consistent with the graded approach. This concept should be included in sections 3.17.a and 3.17b to further develop the graded approach for transitional facilities.

6. Status of DOE Fire Safety Workshop

Eric Gosswiller updated the group on the status of the DOE Fire Safety Workshop. Per Dennis Kubicki, the workshop is a go, to be held at Argonne National Laboratory, with official dates established as April 16 through April 20. Additional details are anticipated in the near future and will be forwarded to distribution.

7. Wrap Up

The telecon was concluded with summary of action items and the identification of Subgroup Meeting at the DOE Fire Safety Workshop as the tentative next meeting.

Telecon Participants

From Subgroup Member Directory

Robert Bitter	KCP
Rich Kobelski	Flour Hanford
Rex Jordan	Consultant, Flour Hanford
Bruce Campbell	Hughes Associates
Gary Piermattei	LBNL
Jeff Hancock	Pantex
David Baity	ORNL
Bill Brown	Y-12
Dave Moyer	Y-12
Chuck Augestin	YMP
Joe Levesque	BNL
Glenn Schroeder	ANL
Perry D'Antonio	Sandia National Laboratory
Chuck McKnight	INL
Eric Gosswiller	INL