

**Formal Interpretation**  
**NFPA 101<sup>®</sup>**  
**Life Safety Code<sup>®</sup>**  
**2000 Edition**

**Reference:** 7.1.3.2.1(d)

**F.I. No.:** 101-97-4

**Background:**

Case 1. A means of egress for a building's floors above the level of exit discharge (LED) has been designed to include an exit stair enclosure with a door that discharges directly to the outside at the LED. At the LED there is also a door that swings into the stair enclosure from the exit access corridor that serves the LED. As one of their required means of egress, occupants of the LED will travel from the exit access corridor into the exit stair enclosure and through the door to the outside.

Case 2. A means of egress for a building's floors above the level of exit discharge (LED) has been designed to include an exit stair enclosure with a door that discharges directly to the outside at the LED. The required means of egress from the building's LED will be fully met (independent of the stair enclosure) by a system employing doors directly from the corridor to the outside. Additionally, a "convenience" door will be installed in the corridor/stair enclosure wall on the LED for normal day-to-day use.

**Question No. 1:** With respect to Case 1, is it the intent to prohibit the means of egress from the LED that involves passing through the exit stair enclosure on the basis that 7.1.3.2.1(d) limits openings to those "necessary for access to the enclosure" (and, thus, require that the means of egress for the LED be redesigned so as not to use the exit stair because it wasn't necessary to design the egress system to pass through the stair enclosure)?

**Answer:** No.

**Question No. 2:** With respect to Case 2, is it the intent to prohibit the "convenience" door to/from the exit stair enclosure at the LED on the basis that 7.1.3.2.1(d) limits openings to those "necessary for access to the enclosure"?

**Answer:** No.

**Issue Edition:** 1997

**Reference:** 5-1.3.2.1(d)

**Issue Date:** August 2, 1999

**Effective Date:** August 22, 1999

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**Reference:** Section 11.7; 3.3.54 Emergency Access Opening; 3.3.197.12 Structure, Windowless

**F.I. No.:** 101-97-6

**Question No.:** Is it the intent to permit a window, panel, or similar opening that cannot be opened by building occupants from the interior but can be opened from the exterior with normal fire department equipment to be considered an "emergency access opening" for purposes of applying the definition of a "windowless structure"?

**Answer:** No.

**Issue Edition:** 1997

**Reference:** 32-7.2 Access Openings and Windowless Structure

**Issue Date:** July 12, 2000

**Effective Date:** Aug 1, 2000

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**Reference:** 18.3.6.3.5, 19.3.6.3.5, 18.3.7 and 19.3.7

**F.I. No.:** 101-97-5

**Question No. 1:** (18.3.6.3.5 and 19.3.6.3.5) Is it the intent of 18.3.6.3.5 and 19.3.6.3.5 to prohibit the application of push-plates, hardware, or other attachments on corridor doors in health care occupancies?

**Answer:** No.

**Question No. 2:** (18.3.7 and 19.3.7) Is it the intent of 18.3.7 and 19.3.7 to prohibit the application of push-plates, hardware, or other attachments on smoke barrier doors in health care occupancies?

**Answer:** No.

**Issue Edition:** 1997

**Reference:** 12-3.6.3.4, 13-3.6.3.4, 12-3.7 and 13-3.7

**Issue Date:** August 17, 1999

**Effective Date:** September 7, 1999

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**Reference: 7.2.1.6.1**  
**F.I. No.: 00-1**

**Background:** Paragraph 7.2.1.6.1 requires delayed-egress locks to be approved and listed. Subparagraphs (a) through (d) detail additional specific requirements. Subparagraph (c) and the listing requirement are the focus of this interpretation.

The two types of listed delayed-egress locking systems commonly available differ in the manner in which the irreversible process required by 7.2.1.6.1(c) is initiated. The systems function as follows:

1. One system is initiated through an electrical connection between the lock and the door release device (commonly a panic bar or push pad). Upon application of force to the door release device an electrical signal starts the process.
2. The other system is initiated through application of force to either the door or the door release device – if one is provided – so as to cause a displacement (for example, 1/8 in. of movement) of the door in relation to the door frame. It does not utilize a direct electrical connection between the lock and the door release device.

**Question No. 1:** Is it the intent of 7.2.1.6.1(c) to require a direct physical or electrical connection between the door release device and the lock?

**Answer:** No.

**Question No. 2:** Is it the intent of 7.2.1.6.1(c) to permit the initiating force to be applied either to the door itself or to a release device?

**Answer:** No.

**Question No. 3:** Is it the intent to allow door movement initiated by operating the door release device required in 7.2.1.5.4 as one option to initiate the irreversible process.

**Answer:** Yes.

**Issue Edition: 2000**  
**Reference: 7.2.1.6.1**  
**Issue Date: July 10, 2001**  
**Effective Date: July 30, 2001**

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2000 Edition

**Reference: Table 7.2.2.2.1(a)**

F.I. No.: 00-2

**Background:** Paragraph 7.2.2.3.6 on dimensional uniformity permits a 3/16-in. variation in the depth of adjacent treads and in the height of adjacent risers, and permits a 3/8-in. variation between the largest and smallest riser and between the largest and smallest tread in any flight.

**Question:** Is it the intent of Table 7.2.2.2.1(a) that the 7-in. riser height maximum is an absolute measurement, that is, there is no allowance for conventional industry construction tolerances?

**Answer:** No.

**Issue Edition:** 2000

**Reference:** Table 7.2.2.2.1(a)

**Issue Date:** June 3, 2002

**Effective Date:** June 23, 2002