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Mark Salley, P.E.  
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Dear Mark:

Following up on our phone discussion yesterday, I wanted to give you an email reply that you could use in your discussion with others at NRC. The two requests for formal interpretations that you submitted are not being processed as the NFPA Regulations Governing Committee Projects section 6-1.4 says that requests shall not be processed if they involve text that clearly and decisively provides the requested information. Your question on the 1980 edition of NFPA 12A paragraph 2-1.1.1 is just a rewording of the text in the standard.

In other words, the NFPA 12A text talks about a fixed enclosure that will enable the concentration to be built up and maintained to ensure extinguishment in materials. Your question asks if it's installed according to 12A should it be capable of extinguishing a fire in material in an enclosure. The question asks for the same information provided by the paragraph.

Your second request for an FI also involves text that clearly provides the requested information. You are asking if section A-2-4 informs the reader of the need to provide a higher concentration and longer hold time for deep-seated fires. After reading the 7 paragraphs in A-2-4, that is the only conclusion that a reader could come to. It would not be possible to move forward with balloting the Committee on this question as the information requested by the FI request is already contained in the text.

Unfortunately, not all field situation disputes can be resolved by the NFPA Formal Interpretation process. You have explained that you have a situation that involves a cable spreading room that you believe could become a deep-seated fire. The best advice provided for deep-seated fires, higher concentrations, and longer hold times in 1980 is in A-2-4 of the 1980 edition of NFPA 12A. Based on this information you must determine if you have the potential for a deep-seated fire and then the information can be used to determine design parameters.

Please let me know if I can be of further assistance.

Regards,

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