

## **Staff Comments to FAQ 06-0007**

### **Background:**

From NFPA 805 (2001 Edition):

### **3.4 Industrial Fire Brigade**

**3.4.1 On-Site Fire-Fighting Capability.** All of the following requirements shall apply.

(a) A fully staffed, trained, and equipped fire-fighting force shall be available at all times to control and extinguish all fires on site. This force shall have a minimum complement of five persons on duty and shall conform with the following NFPA standards as applicable:

- (1) NFPA 600, *Standard on Industrial Fire Brigades* (interior structural fire fighting)
- (2) NFPA 1500, *Standard on Fire Department Occupational Safety and Health Programs*
- (3) NFPA 1582, *Standard on Medical Requirements for Fire Fighters and Information for Fire Department Physicians*

### **FAQ Questions:**

Based on section 3.4 of NFPA-805, is it correct to interpret that;

1. NFPA-600 would apply only to plants with a traditional fire brigade made up of employees from one or more plant departments?
2. NFPA-1500 and 1582 would apply only to those plants which utilize a fire department organization?

### **Staff Comments:**

NFPA divides fire brigades into two types, based on organization and duties: "Industrial Fire Brigades" and "Industrial Fire Departments." Practically, this means that a fire fighting organization at a nuclear power plant must comply with either NFPA 600 (for an Industrial Fire Brigade) or both NFPA 1500 and NFPA 1582 (for an Industrial Fire Department)

### **Basis:**

From NFPA 600 (2000 Edition):

**1-1.1** This standard contains minimum requirements for organizing, operating, training, and equipping industrial fire brigades. It also contains minimum requirements for the occupational safety and health of industrial fire brigade members while performing fire fighting and related activities.

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**1-1.2\*** This standard shall apply to any organized, private, industrial group of employees having fire fighting response duties, such as emergency brigades, emergency response teams, fire teams, and plant emergency organizations.

**A-1-1.2** This standard is intended to meet or exceed the industrial fire brigade–related requirements of OSHA, 29 *CFR* 1910, Chapter XVII, Subpart L, “Fire Protection.” Further, this standard is intended to ensure the industrial fire brigade member with an appropriate degree of occupational safety and health while performing industrial fire brigade response duties just as NFPA 1500, *Standard on Fire Department Occupational Safety and Health Program*, ensures an appropriate degree of occupational safety and health for the municipal fire department member. ...

From NFPA 1500 (1997 Edition):

**1-1.3** This standard does not apply to industrial fire brigades or industrial fire departments meeting the requirements of NFPA 600, *Standard on Industrial Fire Brigades*. Industrial fire brigades or fire departments shall also be permitted to be known as emergency brigades, emergency response teams, fire teams, plant emergency organizations, or mine emergency response teams.

**A-1-5 Industrial Fire Department.** The vast majority of industrial fire brigades are not industrial fire departments. Industrial fire departments are those few brigades that resemble and function as municipal fire departments. These are generally found only at large industrial facilities and at industrial facilities that also perform municipal fire fighting, usually where the plant is located far from municipalities with organized fire departments. Industrial fire departments are organized and equipped for interior structural fire fighting similar to municipal fire departments. Their apparatus is similar to that used by municipal fire departments.

Industrial fire brigades that provide rescue services are industrial fire departments. Industrial facilities can have separate organizations, covered by separate organizational statements, operating as industrial fire brigades and operating as rescue teams providing rescue not related to fire incidents. Membership in these two organizations can overlap.

From NFPA 1582 (2000 Edition):

**1-1.3** This standard shall not apply to industrial fire brigades that also can be known as emergency brigades, emergency response teams, fire teams, plant emergency organizations, or mine emergency response teams.

**FAQ Question:**

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3. Reference in section 3.4.1(a)(1), to “(interior structural fire fighting)” limits the applicable sections of NFPA-600 (2000 edition) to Chapters 2 and 5, (excluding incipient stage fire fighting, and advanced exterior fire fighting, Chapters 3, 4, 6)?

### **Staff Comment:**

NFPA 805 Section 3.4.1(a) states “A fully staffed, trained, and equipped fire-fighting force shall be available at all times to control and extinguish all fires on site.” For interior fire fighting, at a minimum, the licensee shall meet the requirements noted in NFPA 600, Chapters 5, *Industrial Fire Brigades That Perform Interior Structural Fire Fighting Only*. For exterior fires that could jeopardize the ability to meet the performance criteria described in NFPA 805, Section 1.5, the licensee shall be able to demonstrate their ability to control and extinguish those fires. /

### **Request:**

The Staff requests NEI to revise FAQ 06-0007, documenting the actual concerns regarding this FAQ and the proposed resolution or clarification for NEI 04-02.