



Environment, Safety, Health & Assurance

Interoffice Communication

G40 TASF

PH: 515/294-9769

September 13, 2012

To: File
Shawn Nelson, ESH&A Assistant Manager

From: G. P. Jones

Subject: **2012 Topical Appraisal – NFPA 10, *Standard for Portable Fire Extinguishers***

The Topical Appraisal is attached.

Topical Appraisal- NFPA 10, *Standard for Portable Fire Extinguishers*

September 13, 2012

1.0 Scope

The topical appraisal of the Laboratory's processes for compliance with NFPA 10, *Standard for Portable Fire Extinguishers*, was conducted to determine if the process was well defined and compliant with the requirements delineated in the Standard.

2.0 Dates

The appraisal was performed during September, 2012.

3.0 Methodology

3.1 References

The 2010 edition of NFPA 10, *Standard for Portable Fire Extinguishers* was used for this evaluation. Requirements in the Standard were compared to practices of Plant Protection Section for the selection, placement, inspection, maintenance and testing of fire extinguishers.

3.2 Program Documentation

The practices for the fire extinguishers are documented in a Fire Extinguisher binder in G34 TASF, and are routinely evaluated when a new version of the Standard is released. The current versions of the activity sheets are dated April 7, 2011, and are compliant with the 2010 Standard. Individual task instructions have been written for Annual Maintenance, Hydrostatic Testing (prep work), Monthly Inspections, and Lime Barrel Inspections. Each instruction lists safety notes, comments and step-by-step instructions for completion. Records for individual fire extinguishers are maintained electronically on the moderate enclave Group drive, and back-ups are maintained of the historical data to prevent loss.

3.3 Training

The two officers performing annual external maintenance of the fire extinguishers are trained, and tested every three years by the Ames Laboratory Training Office, as per the Formal Interpretation from NFPA at the end of this document. No concerns were identified.

3.4 Personnel Interviewed

Interviews were conducted with Phyllis Mann and William Martin, the two Plant Protection Section personnel responsible for the fire extinguisher program.

Assessment Results and Discussion

4.1 Results

The Ames Laboratory has adequately documented the policy and practice expected for fire extinguisher placement, maintenance and inspection, and has a sufficient process in place to document the status and placement of fire extinguishers.

4.2 Noteworthy Practices – None

4.3 Findings

A non-compliance was identified earlier this year regarding the performance of the vendor selected to perform the hydrostatic testing of fire extinguishers. This resulted in Categorization E12-008, and the selection of a new provider of the hydrostatic testing of the cylinders.

4.0 Overall Conclusions

The program is compliant with the Standard.

Upon acceptance of this Topical Appraisal, it will undergo categorization for potential reportability to DOE.

A copy of this report will be filed and saved in G:\Admin\Topical Appraisals\2012 and maintained in the audit files.

6.0 Attachments

Attached is a copy of the Formal Interpretation of the training required for external maintenance of fire extinguishers.

Formal Interpretation

NFPA 10

Portable Fire Extinguishers

2010 Edition

Reference: 7.1.2.1, 7.1.2.2, 7.3.1.1.1, 7.3.2.1.2
E.I. No.: 10-98-1

Background: Some people claim that a maintenance procedure that does not require internal maintenance is essentially the same as a monthly inspection procedure, so only minimal knowledge is required and no special training.

Some people claim persons performing the external examination required by 7.3.2.1.2 need special training, the manufacturer's maintenance manual, repair parts, and appropriate servicing equipment.

Question: Subparagraph 7.3.1.1.1 requires extinguishers to undergo maintenance annually. Subparagraph 7.3.2.1.2 requires certain extinguishers to be examined externally only. Are individuals conducting this external maintenance required to be trained in accordance with 7.1.2.1 and 7.1.2.2?

Answer: Yes.

Issue Edition: 1998
Reference: 4-1.4, 4-4.1, and 4-4.2
Issue Date: December 15, 1998
Effective Date: January 4, 1999