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STATE FIRE MARSHAL'S REQUIRED FIRE PROTECTION SYSTEMS NARRATIVE REPORT

The interaction of fire protection systems can be extremely complex. The detection of a fire in a building by an automatic device may be designed to initiate other life saving fire protection systems or devices, or other mechanical systems. In some circumstances different individuals or different companies may design safety systems, which are required to interact. The narrative report is intended to provide a single document, which describes the design rationale of all fire protection systems and the interface between systems. It is an invaluable tool for building officials, fire officials, building owners and maintenance personnel.

Section 1-14.3 of the Rhode Island Uniform Fire Code authorizes the Authority Having Jurisdiction to require the submission of fire protection system narrative reports as part of the construction documents, which must be filed in order to obtain approval to seek a building permit. The following document has been developed to assist end users of the Rhode Island Fire Safety Code, the Rhode Island Fire Prevention Code, and the Life Safety Code in the preparation of "narrative reports" for fire protection systems.

NARRATIVE REPORTS

GENERAL

Fire Protection Construction Documents:

- a) Basis (methodology) of design for the protection of the occupancy and hazard compliance with the Rhode Island Fire Safety Code and applicable NFPA Standards in the form of a narrative report.
- b) Sequence of operation of all fire protection systems and operation in the form of a narrative report.
- c) Testing Criteria to be used for final system acceptance in the form of a Narrative report.

DEFINITION

A "Narrative Report" is a written summary description of the building or structures and all applicable fire protection systems and related operational features. Explains the analogy and methodology used by the designers in the design of the systems for the protection of the building occupants and emergency response personnel for all required and non-required fire protection systems.

APPLICABILITY

Where permits, inspections, and approvals are required by fire department officials for required fire protection systems installed in new buildings or structures, modifications or additions to existing fire protection systems, non-required fire protection systems

regulated by codes other than the fire code or voluntarily installed fire protection systems. Administratively, depending on the project size, scope and complexity, the code official should make a reasonable decision when to require a full comprehensive or partial report.

PURPOSE

The Narrative Report expedites the plan review and inspection process by fire officials. It is maintained on file for use at the time of final inspections and periodic reviews during future field inspections. It is referenced to insure that all future modifications, alterations, addition or deletions to the original systems are current and that the original system's protection and required system performance are not compromised or have been altered without prior review by fire officials. Building owners benefit by knowing how their building's fire protection and life safety systems work and provides procedures and methods for testing and maintenance. A copy of the Narrative Report should be kept on the premises and be available for review prior to testing or proposed modifications to be made to any portion of the building's life safety systems.

DEVELOPMENT & SUBMISSION FORMAT

Prepared by a qualified individual who has "taken charge" in the development of an entire coordinated "report" which includes all information regarding the design basis, sequence of operation and testing criteria associated with all required or non-required fire protection systems set forth by applicable Laws, Regulations and Standards.

The "report" is to be submitted with plans and specifications for review and approval by code officials prior to the issuance of a building permit. The Narrative Report should be written in a clear conversational format. The installation specification is not considered a Narrative Report. The Narrative Report is a stand alone document on 8 ½" x 11" paper for filing and ease of use by code officials, including an administrative cover page identifying the project name, building address, name, address and phone number of the individual who has "taken charge" in the preparation of the Narrative Report.

COMMENTARY

The promulgation of the Life Safety Code is written in a way to require uniformity for all buildings and structures regardless of local conditions. The intent of the codes can be subjective and interpretative by both designers and code officials, uniformity is not always necessarily achieved.

The Narrative Report attempts to clarify to the code official the designer's intent and his interpretation of the code. The code official may agree or disagree with the designer's interpretation.

Historically the requirements for fire protection systems have become site specific and code requirements are not uniformly enforced. The size of the community, fire department staffing, fire department equipment availability and suppression tactics

established by the local fire department have effected the uniformity of enforcement. Site specific requirements less than or more than the code requires may have reasonable intent; however, this type of enforcement in some cases has proven to be controversial in the applicability of code uniformity. The Narrative Report can be a valuable instrument when accurately prepared, it will establish a line of communication between the designer and the code official resulting in what the code mandates, uniformity and consensus in the interpretation of the codes.

(Part I) BASIS (METHODOLOGY) OF DESIGN

This portion of the narrative report should be broken down into the following six sections.

SECTION 1 -Building Description

This section identifies specific features of a building that contributes to the overall understanding of the fire protection systems and features required to be identified in the Narrative Report:

- a) Building "Use" Group or "Occupancy" classification
- b) Total square footage of building
- c) Building height
- d) Number of floors above grade
- e) Number of floors below grade
- f) Square footage per floor
- g) Type (s) of occupancies (hazards) within the building
- h) Type (s) of construction
- i) Hazardous material usage and storage
- j) High storage of commodities within a building usually over 12 ft.
- k) Site access arrangement for emergency response vehicles

SECTION 2- Applicable Laws, Regulations and Standards

This section identifies regulatory codes and standards that may have an impact in the design and plan approval of the required and the non-required fire protection systems as per the requirements of the building code and fire code, requiring the writer of the Narrative Report to conduct a comprehensive code analysis, including the following:

- a) Building code sections "Fire Protection Systems»
- b) NFPA Standards. The referenced edition used for design of each specific fire protection system.
- c) Applicable sections of the Rhode Island Fire Prevention Code
- d) Applicable local laws or ordinances
- e) Applicable specialized codes plumbing, mechanical, electrical, elevator, architectural access
- f) Applicable Federal Laws (OSHA, ADA, etc.)

SECTION 3 -Design Responsibility for Fire Protection Systems

This section identifies the accountability for a specific fire protection system design and the accountability for the integration of the fire protection systems constituting a building life safety.

- a) The professional engineer (PE) fully designs (complete layout and Calculations) and specifies the fire protection system or systems to be installed, reviews and approves the installing contractor's shop drawings. The PE is considered the engineer of record and certifies system installation for code compliance at completion.
- b) The professional engineer (PE) provides a partial design and specifies the design criteria to be used by the installing contractor who finalizes the system layout and provides calculations to confirm the design criteria. The PE is considered the engineer of record and certifies system installation for code compliance at completion.
- c) Design-build, the installing contractor completely designs and specifies (develops a full system layout, design criteria and calculations), installs the system and certifies system installation for code compliance at completion. There may be a professional engineer involved but not necessarily. Whichever above method is selected, the project requires an engineer of record to assume responsibility for the coordination of each specific fire protection system requiring integration, forming and entire building life safety system.

SECTION 4- Fire Protection Systems to be installed

This section identifies key "performance design criteria" and features for each specific fire protection system:

- a) Water supply, fire mains and hydrants
- b) Automatic sprinkler systems and components
- c) Standpipe systems and components
- d) Fire alarm systems and components
- e) Automatic fire extinguishing systems
- f) Manual suppression systems
- g) Smoke control/management systems
- h) Kitchen cooking equipment and exhaust systems
- i) Emergency power equipment
- j) Hazardous material monitoring equipment
- k) Seismic considerations

The description (specific features) for the above fire protection systems shall also indicate if the system is:

- Required by Regulations, Laws, Standards or Ordinance
- Non-required, developer provides voluntarily
- A complete new system
- An addition or expansion to existing system
- A modification/repair to existing system
- Level of protection to be provided, 100% or partial protection or exempt by regulatory code

SECTION 5- Features Used in the Design Methodology

This section identifies the designer's intent in the overall design and criteria development of either a required or a non-required system.

- a) Building occupant notification and evacuation procedures
- b) Emergency response personnel, on-site and systems
- c) Safeguards, fire prevention and emergency procedures during new construction and impairment plans associated with existing system modifications.
- d) Method for future testing and maintenance of systems and documentation

SECTION 6- Special Consideration and Description

This section identifies the designer's intent to deviate from prescriptive requirements of regulatory codes and standards with alternative methods.

- a) Prevents the architect using alternatives without telling us first
- b) Interpretation/clarification between designer and code officials
- c) Waiver or variance sought through the regulatory appeal process

(Part 2) SEQUENCE OF OPERATION

This portion of the narrative report is a difficult section to write as it entails the specific operation of system devices and equipment and their related integration

SECTION 1

- a) An operational description of either a system or specific devices within a system and the "resulting action" associated with the operation of the system or specific devices.
- b) The operational description shall include all interconnected (integrated) fire protection systems and devices required or non-required forming an entire building life safety system.
- c) All signage indicating equipment location, operational and design features and certified documents attesting to system installation integrity.

This section of the narrative report can be brief as in a simple system such as a one-story 15,000- sq.ft. mercantile building with only a sprinkler system and fire alarm notification devices. Or complex, such as in a 25 story high-rise hotel with fire pumps, emergency generator, fire alarm and sprinkler zones, automatic standpipes, automatic voice and manual evacuation signals, smoke management system, automatic elevator recall, special extinguishing systems, remote annunciation, automatic locking devices, alarm transmission methods and emergency response procedures. The sequence of operation of a building life safety system, particularly with complicated systems must be reviewed and understood by code officials. A team approach should be used by developers, designers, equipment suppliers, and contractors, including code officials to clearly describe and understand the proper operation of the integrated systems. When a complex system is proposed, the initial narrative report of the "sequence of operation" should be viewed only as a draft. At various stages of installation modifications may be made. The designers should submit a final narrative for approval by the code officials prior to witnessing a system acceptance. Communication between the developers and code officials is an important element particularly in this phase, as the building codes and the NFP A Standards tend to be flexible and interpretative.

(Part 3) TESTING CRITERIA

This portion of the narrative report should be broken down into the following three sections:

SECTION 1 -Testing Criteria

This section identifies the individual in charge who will coordinate the final acceptance testing that will be witnessed by the appropriate code officials.

Required Personnel

- a) Identification of professional in charge for setting up and coordinating all testing.
- b) Method of verification and confirmation by professional in charge that all fire protection systems, equipment and devices have been individually tested and tested as an entire system when specific systems are integrated to form a building life safety system.
- c) Method of coordination by professional in charge of all contractors, equipment distributors and code officials required to perform and witness all testing.
- d) Testing date and times, notification to public utilities, personnel required to perform all required testing as a system or individual system component testing.

SECTION 2- Equipment and Tools

This section will identify the necessary equipment available on site at the time of witnessing the operational features of the fire protection systems or the integrated building life safety systems that require validation from code officials to expedite the acceptance testing.

Identification of equipment and procedures to be used to verify system performance (Example):

- Manufacturer's instructions
- Supplier's special instructions
- Approved Narrative Report, sequence of operation section
- Smoke machines
- Smoke candles
- Sound meters
- Fire hoses, nozzles
- Flow measuring devices
- Gauges
- Voltage meters
- Magnets
- Communication radios
- Fire department equipment
- Special tools
- Notification announcements
- Who brings what equipment for testing purposes?

SECTION 3- Approval Requirements

This section identifies all the "close-out" documents for the code official's departmental records:

- a) Establish method of approval required (verbal or written) from code official if system satisfies all operational code compliance requirements.
- b) Establish method of remedial action when a system or portion of a system fails to operate satisfactorily.
- c) Documentation to be submitted to code officials at completion verifying that systems are in compliance with all laws, regulations and standards and pre-approved narrative reports.
- d) Documentation as required by the Building and NFP A Codes. (Example: Complete and sign the appropriate Contractor's Material and Test Certificates for aboveground or underground piping).
- e) Documentation to be submitted to code officials listing names, address and telephone numbers of personnel for emergency notification.

DEFINITIONS

Fire Protection Systems -Automatic sprinkler systems, fire detection system, fire alarm notification system, smoke control system, kitchen hood suppression system, etc.

Building Life Safety System -A combination of fire protection systems and other building fire protection features such as automatic door closer, emergency generator, emergency egress lighting, elevator systems, etc., interconnected or integrated with multiple fire protection systems functioning simultaneously when activated.

Writer of Narrative Report -An individual who has taken charge of a project and has knowledge of required and non-required fire protection systems and buildings life safety systems. The designer in charge of a specific design for a fire protection system may prepare their portion of the Narrative Report to be submitted to the individual who has "taken charge". The individual who has "taken charge" shall compile the data from the designer of each system and prepare a single, comprehensive and coordinated final Narrative Report describing each system and when applicable a description of how each system interfaces with the building life safety system's, their integration and sequence of operation. The take charge individual may be the architect, engineer of record, designer of any of the fire protection systems or an independent qualified consultant.