

memorandum

DATE: SEP 29 1988
REPLY TO:
ATTN OF: EH-321
SUBJECT: NFPA 1500 Implementation Plan.

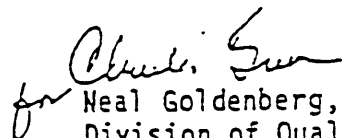
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The draft of the subject document was circulated for comment per Mr. Barber's May 20, 1988, memorandum. The comments have been incorporated and the revision is attached for your information.

The NFPA 1500 Standard is considered applicable to those organizations trained and organized to perform structural firefighting at DOE facilities. It does not apply to incipient firefighting, fire warden programs, or personnel who may provide special support during a fire, such as mechanics or electricians who are not expected to be involved in firefighting. The standard site safety programs will continue to apply to these people.

No guidance is contained for Section 8 of NFPA 1500. The Director of DOE medical programs is expected to issue such guidance in the future. Until then, each department should endeavor to provide as much of a program as is consistent with current site practices.

A Fire Protection Resource Manual is being developed. This document will be included with the manual, when issued.


Neal Goldenberg, Director
Division of Quality Verification
Office of Quality Programs

Attachment
Draft NFPA 1500
Implementation Plan

STANDARDS INTERPRETATION/IMPLEMENTATION
(INTERP.4)

STANDARD:

NFPA 1500: Standard on Fire Department Occupational Safety and Health Program - 1987 Edition.

DOE IMPLEMENTATION:

Section 1-3.1. The implementation date of this standard is the date of this issuance. Exceptions are noted in other items.

Section 2-1.1. The documents required by this section need not be consolidated into a single document. In particular, Policy, Organization, and functional statements should be available for audit and up to date. Training documents may consist of manuals, films, and other materials prepared by others and merely referenced in a training plan, or in functional statements.

Section 2-3. Where the fire department, or other firefighting organization, is part of a larger organization that provides the requisite "research, development, implementation, and enforcement, of an OS&H program," the fire department program needs may be included within the larger program.

Section 2-4. A Safety Officer shall be designated for each organization. Where safety services, monitoring, training, etc., are provided by another on-site organization, or the parent organization, the person designated as the Safety Officer shall be responsible for coordinating the services required by the department.

Responsibility for safety at the first-response level shall be incorporated in the department's emergency procedures manual.

The fire department Safety Officer can be anyone in the organization who can show up on the scene, not necessarily with the first response, but must be someone other than the incident commander as the Safety Officer is intended to be an independent voice, advising the incident commander.

Section 2-5. The OS&H Committee may include representatives from other organizations when the department is part of a larger organization or at a site where safety services are provided by others. The required safety meetings may be joint meetings with others if the department's safety needs are amenable to joint meetings.

Section 2-6. The records required in this Section may be maintained by a parent or service organization as long as they are auditable and are available to the department.

Section 2-6.2. The department shall have a procedure for reflecting possible exposures in the incident files and individual medical records.

Section 3-1.4. The requirement for training and education is considered to require that all firefighters must be trained in the hazards to be encountered at the scene of an incident before they can participate in active operations requiring such training.

Section 3-1.5. The individuals providing the training and education need not be members of the fire department, but they should be knowledgeable in the area of instruction as it relates to the fire service.

Section 3-1.6. Training Officer qualifications may be met by either compliance with the stated NFPA 1041, or by obtaining local or state certification.

Section 3-3.2. All personnel assigned to structural firefighting positions shall receive training adequate to meet the Firefighter I qualification of NFPA 1001.

Section 3-3.3. Training programs for drivers/operators shall be designed to meet the intent of the referenced standard. It is understood that some licensing requirements will vary by states and/or type of equipment.

Section 3-3.4. All specialized training programs, i.e., fire officer, driver/operator, airport firefighter, shall be developed and implemented within each organization. This shall be so accomplished as to meet the intent of the appropriate NFPA Standard.

Section 3-4. Training in fire ground operations shall be based on accredited systems, such as those provided by the International Fire Service Training Association manuals, official state training manuals, etc.

Section 3-5. Because of the specialized operations and hazards peculiar to most DOE sites, these "special hazards" training requirements are of prime importance. Training should include not only the nature of the hazards, but familiarization with the protective systems employed, the monitoring and alarm systems peculiar to the operation, and the support services provided by other parts of the site organization in monitoring or alleviating an emergency situation.

Section 4-2.1. Drivers of fire department vehicles shall receive special training in the operation of the vehicle and must be certified and/or licensed, as appropriate, or as required by the State to operate fire department vehicles.

Section 4-2.4. An exception to the requirement is the rear attendant of an ambulance when actively attending to a patient. This exception shall stand until such time as acceptable safety restraints are available for the rear ambulance attendant.

Section 4-3.1. An exemption may be granted for some site-specific vehicles, such as golf cart-type vehicles used within building to deliver supplies and equipment and automatically restricted in maximum speed. However, any such exemptions must be reviewed and approved by the Safety Officer and documented in the department files.

All present and future acquisitions of used apparatus shall be brought up to the minimum standards for safety seating requirements.

Section 4-5.4. For ladders, see the Interpretation Note on NFPA 1932. (All test conditions are required except that the annual test requirement may be changed to not less than every five years. All other conditions noted as requiring the test are unchanged).

Section 5-1.1. As a clarification, all equipment must be available and donned before the individual indulges in any evolutions requiring protective clothing use. It is not necessary for each member of a department or brigade to have a full set of all protective clothing as long as supplies for the anticipated needs can be delivered to the point of use in adequate quantities and sizes for anticipated needs and without incurring undue delay in the emergency response.

All new equipment needed to fulfill the requirements of this Section shall be procured by the end of FY 1990.

Section 5-2.7. The fire resistance of work station uniforms should be considered in applying this Section. Where firefighting is provided by personnel who have other primary jobs, such as in most fire brigades, the provisions of NFPA 1975 need not be applied to their work clothing. However, any exceptions to the requirement should be reviewed by the Safety Officer and exception documented in the department records. Training needs and turnout gear provisions should take into account the clothing normally worn by responders.

Section 5-3.4.2. SCBA cylinders need not be emptied quarterly if not required by the manufacturer/supplier.

Section 5-4.1. Personal Alert Safety Systems (PASS) need be provided only for people involved in interior firefighting or hazardous responses.

Section 5-5.3. Life safety ropes used for rescue shall be previously unused and shall be thoroughly examined upon completion of rescue in accordance with the manufacturer's recommendations. Ropes used for rescue shall remain in the custody of the original purchasing engine company or fire department. Records shall be kept, documenting the use, inspection, and inspector, immediately after each use and prior to any future use. The date and officer in charge will also be indicated on the records. All ropes leaving the custody of the fire department must be destroyed, or otherwise prevented from being reused in life safety operations. Any indication of wear or shock loading will be justification to destroy said rope. Life safety ropes shall be completely dry and clean prior to restring for use as life safety lines.

Section 5-8.1 and Section 5-8.2. Change "shall" to "should." In view of the limited number of responses and shorter travel distances at DOE facilities, as compared to operations by municipal fire departments, and the Appendix discussions on these sections, the mandatory continuous use of hearing protection is not required. However, the Safety Coordinator should ensure that a hearing protection program is in place that is compatible with site-wide programs.

Section 6-1. Some of the requirements pertaining to emergency operations may be covered by a parent organization or be provided by other on-site organizations at DOE facilities. Health physics, for example, may provide the basic personnel required by Section 6-1.7 for radiological emergencies. All of the elements of Chapter 6, however, should be in place in the overall site plan. All emergency plans should clearly identify the incident commander for each type of emergency.

Section 6-2. The minimum response requiring interior firefighting or other operations requiring the entrance of SCBA-equipped people shall be 5 persons. When less personnel are available, interior operations shall not be attempted.

Section 6-3.2. Clarification. The requirement for personnel "standing by" does not mean the required people cannot be performing some other function, but they must be able to suspend what they are doing to provide the immediate rescue efforts.

Section 6-3. The "standing by" requirement for qualified life support personnel may be relaxed if, in the Chief's opinion, "qualified personnel are readily available and are dedicated to the site. (At a small site, it should not be necessary for medical/ambulance personnel to respond on every incident).

Section 8. A number of the requirements of Chapter 8 are currently planned for DOE-adoption, such as a Health Data Base (Section 8-1) and Rehabilitation (Section 8-6), and Physical Fitness Program (Section 8-2). In addition, a number of federal, state, and local requirements are being imposed or are under development that pertain to the subjects in Chapter 8. As an interim requirement, all DOE departments shall identify any discrepancies from the Chapter 8 requirements (and referenced NFPA 1001 Standard) needed to attain complete compliance with the Chapter.

NOTE: The resource needs shall be provided to the DOE Health Protection Director as planning input. Regardless of what future programs may be required, each organization should endeavor to bring current programs into compliance with the provisions of Chapter 8. Pending the development of the final criteria, a dedicated effort should be made by each department to develop a physical fitness maintenance program.

IMPACT:

These implementations recognize the portions of the Standard that refer to services and functions provided at many DOE sites by other organizations than the fire department. By allowing for their incorporation into the fire department programs, the duplication of effort and added expenses are eliminated.

Also, by recognizing the special conditions applicable to some DOE operations, the intent of the Standard can be achieved without all of the conditions applicable to an independent municipal fire department.

Since the Standard is new, there will be an added expense to those departments not currently in compliance. However, the added benefits of establishing a thorough and recognized safety program outweigh the initial costs.