## DEPARTMENT OF PUBLIC SAFETY AND CORRECTIONS



## Public Safety Services



## INTERPRETIVE MEMORANDUM 2009-04

To: LA Licensed Architects

LA Licensed Engineers Licensed Locksmiths

Licensed Burglar Alarm Contractors

Arkansas, Louisiana and Texas Locksmith Association

Louisiana Life Safety and Security Association Louisiana Automatic Fire Alarm Association

Licensed Fire Alarm Contractors

Chief Dan Wallis, Deputy Asst Fire Marshal Enforcement/Emergency Services

Felicia Cooper, Deputy Asst Secretary/Plan Review

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From: Don Zeringue, Chief Architect/Plan Review

Approved by: Chief Butch Browning, State Fire Marshal

Date: October 1, 2009

RE: MAGNETIC LOCK RELEASING DEVICES & ELECTRIFIED LOCKS/LATCHES

(NOTE: This Memorandum replaces IM 2006-04 dated March 8, 2006)

This office enforces the requirements of the NFPA 101 Life Safety Code for all new installations of special locking arrangements as outlined in MEMORANDUM 2009-03. NFPA 101 has long prescribed that, "A latch or other fastening device on a door shall be provided with a releasing device that has an obvious method of operation and that is readily operated under all lighting conditions."

The 2003 edition of NFPA 101 included an option to the requirements of access-controlled egress doors, permitting the use of listed panic hardware or fire exit hardware that, when operated, unlocks the door, in lieu of providing a sensor arranged to detect an occupant approaching the door. NFPA published the 2006 edition of the NFPA 101 Life Safety Code whereby the option was removed.

The Annex of the 2006 edition of NFPA 101 contains an explanation as to why the option was removed. It states in part, "It is within the intent of this requirement that switches integral to traditional door knobs, lever handles, or bars, and that interrupt the power supply to an electromagnetic lock, be permitted, provided that they are affixed to the door leaf."

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The NFPA 101 Life Safety Code requires fire protection features that will provide a minimum acceptable level of safety. Based on code intent and the observations presented above, it is the interpretation of this office that a door provided with an electromagnetic lock and an appropriately <u>listed, mechanically activated releasing device</u> affixed to the door (door hardware) that results in direct interruption of power to the electromagnetic lock when activated, will not be required to comply with the provisions for access-controlled egress doors provided the following conditions are met:

- The releasing device shall be listed for the intended purpose and shall utilize a mechanically operated switch for the releasing operation. Devices providing "sensor" operated release shall comply with the provisions for "access-controlled egress doors" prescribed by the NFPA 101 Life Safety Code, if permitted by the applicable occupancy chapter.
- 2) \* The releasing device shall have an obvious method of operation that is readily operated under all lighting conditions and shall not require the use of a key, a tool, or special knowledge or effort for operation from the egress side.
- 3) \* Where power is lost or removed from the principal locking system components, the latching hardware shall FAIL-SAFE and continue to provide "positive latching" where required by other sections of the code. Automatic relocking upon the return of power to all of the principal components shall be permitted, however door operation for egress from the building must be obvious and unimpeded at all times.
- \* ELECTRIFIED DOOR HARDWARE (LOCKS/LATCHES) that operate in the same manner as described in <u>conditions 2 and 3 above</u> shall be recognized as special locking arrangements and will not be required to comply with the provisions for access-controlled egress doors.

These types of locking arrangements are subject to the licensing laws, rules and regulations enforced by this office. New installations of this special locking shall be submitted for review to this office as outlined in **INTERPRETIVE MEMORANDUM 2009-03**. Please note that the magnetic lock releasing device shall provide a <u>mechanical</u> means of release by an appropriately listed, <u>mechanically activated releasing device</u> affixed to the door (i.e.; door hardware listed to release electromagnetic locks).

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Refer to Interpretive Memorandum 2009-03 for further information regarding submittal requirements for a "SPECIAL LOCKING - REQUEST FOR INSTALLATION". Should you have any questions regarding this matter, please contact the Plan Review Section of this office in Baton Rouge at 1-800-256-5452 or (225) 925-4920.

See RS 40:1664 ("Life Safety and Property Protection Licensing Act") for regulations concerning licensing for special locking installations. Questions regarding licensing should be directed to the Licensing Section of this office in Baton Rouge at 1-800-256-5452 or (225) 925-7047.