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| <b>PPPL</b>               | <b>PRINCETON PLASMA PHYSICS LABORATORY</b><br>ES&H DIRECTIVES |                   |  |
|                           | ES&HD 5008 SECTION 5<br>Management & Administration           |                   |   |
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## **CHAPTER 2 MANAGEMENT AND ADMINISTRATION**

### **2.1 LINE MANAGEMENT RESPONSIBILITIES**

#### 2.1.1 PPPL Line Management is responsible for:

- A. Providing and maintaining the necessary staff and resources for implementation and documentation of the fire protection program in accordance with applicable DOE, Federal, State, and Local requirements.
- B. Ensuring that funding is secured for correcting fire-protection deficiencies involving their programs or facilities, and for consulting the Fire Protection Engineer for prioritization of the deficiencies.
- C. Coordinating closely with the Facilities and Site Services Division for the purchase or installation of fire protection equipment.
- D. Limiting the potential for the occurrence of a fire or related perils to the maximum extent practicable.
- E. Ensuring that there is no potential for fire to cause an unacceptable on-site or off-site release of hazardous material that would threaten public health and safety or the environment.
- F. Establishing and defining the requirements and controls that will provide an acceptable degree of life-safety to all personnel, and to the public.
- G. Ensuring that vital DOE programs will not suffer unacceptable delays as a result of fire and related perils.
- H. Ensuring that property damage from fire and related perils does not exceed DOE-established levels.
- I. Executing the practices of this Fire Protection Program and adhering to the fire protection requirements for the facilities, operations, and activities under their jurisdiction.
- J. Consulting with the Fire Protection Engineer and the Site Protection Division whenever requirements cannot be met or need clarification to determine the actions or compensatory measures that must be implemented to achieve compliance or to provide an equivalent level of protection.

- K. Submitting a written request or proposal to the Fire Protection Engineer if an exemption from Program requirements is needed or an equivalent approach is proposed.

## **2.2 PROGRAM ADMINISTRATION**

2.2.1 The Facilities and Site Services Division and Site Protection Division are responsible for administration of the Fire Protection Program. Specific responsibilities for the Fire Protection Program include:

- A. The Facilities and Site Services Division is responsible for the installation, maintenance, documentation, and inspection of fire protection systems. This includes ensuring that fire protection equipment (except that maintained by the ESU), is maintained in full operating condition, and for initiating corrective action when repairs or maintenance are required.
- B. The Fire Protection Engineer of the Facilities and Site Services Division has the responsibility of providing guidance to the Laboratory for the Fire Protection Program; interpreting codes, standards and DOE Orders; reviewing designs that affect fire systems; Fire Hazard Analysis; performing inspections and tests; evaluating compliance with the fire protection program; fire investigation; reviewing and processing exemption/equivalency proposals; participating in QA audits; and interfacing with external audits and assessments of the Program.
- C. The Site Protection Division is responsible for the development and implementation of the PPPL Emergency Preparedness Plan; providing adequate resources to address fire, medical, and other emergencies and providing support to the Facilities and Site Services Division, via personnel, for testing and inspections; reviewing designs that affect fire systems; and maintaining fire fighting equipment.
- D. The QA Division is responsible for conducting assessments of the Fire Protection Program, and for tracking and trending results of internal and external assessments.

2.2.2 When there is a conflict between the requirements of the Fire Protection Program and those of another discipline (e.g. Security requirements), the Fire Protection Engineer and/or the Site Protection Division Head, depending on the area involved, are responsible for resolving the conflict with the Manager of the other discipline. If a resolution cannot be reached, the issue shall be escalated to the next level(s) of management until resolved.

2.2.3 PPPL Human Resources (with subject matter expert support from Site Protection and/or Facilities and Site Services) is responsible for the development and implementation of training programs dealing with the fire protection program.

## **2.3 FIRE PROTECTION EXEMPTIONS**

2.3.1 When compliance cannot be achieved with required DOE Orders, codes or standards relating to generic and life safety issues, an exemption request (temporary or permanent) shall be submitted by the Facilities and Site Services Division Fire Protection Engineer to the DOE. The exemption shall be processed through DOE-Princeton Site Office in accordance with requirements of DOE Orders and include the following information as a minimum:

- A. Specification of the standard from which the exemption is being requested.
- B. Detailed statements as to why compliance with the requirement cannot be achieved.
- C. A description of what measures will be implemented and maintained to provide equivalent protection to the requirement.
- D. An analysis of the benefit gained or negative impact avoided by receiving the exemption, versus the worst probable incident that may occur under the exemption.
- E. For temporary exemptions, a statement of when compliance will be achieved, and what actions have been and will be taken to meet compliance. A temporary exemption may be in effect for the time required to achieve compliance, but not to exceed one year. In some cases, the exemption may be renewed.

2.3.2 See the Table in Appendix A entitled “Fire Protection Exemptions,” for a current listing of the fire protection exemptions at PPPL.

## **2.4 FIRE PROTECTION EQUIVALENCIES**

2.4.1 When compliance with required DOE Orders, codes or standards cannot be achieved and an alternate method of compliance is needed or desired, the equivalency concept shall include the following information as a minimum and be processed in accordance with the criteria outlined below:

- A. Specification of the standard for which the equivalency is being requested.
- B. Detailed statements as to why compliance with the requirement cannot be achieved, and why an alternate method is needed or desired.
- C. A description of the alternate method, and an explanation of how this method provides protection that is equivalent to the original requirement.
- D. The equivalency concept shall be submitted through DOE-Princeton Site Office to DOE-Headquarters for concurrence.
- E. The equivalency concept may be approved on a temporary or permanent basis.

2.4.2. See the Table in Appendix A entitled “Fire Protection Equivalencies,” for a current listing of the permanent fire protection equivalencies approved for PPPL.

## **2.5 FUNDING PRIORITIZATION OF FIRE PROTECTION ITEMS**

- 2.5.1. Open fire protection items (such as unfunded projects and findings from internal and external assessments) shall be maintained and updated at least annually. Each item shall be prioritized based on the potential risk to assist management to ensure that higher risk items receive priority funding in the budgeting process. Fire protection items are typically tracked and prioritized with other open ES&H related items via the General Plant Projects prioritization process, normal review and prioritization of OPEX items, and distribution of Open Items reports.