Code Interpretation
Annual Inspection and Testing of Swinging Fire Doors [March 6, 2015]

Question for Interpretation

Does the 2015 Minnesota State Fire Code (MSFC) require annual inspection and testing of swinging fire doors as described in Chapter 5 of the 2010 edition of NFPA 80?

Interpretation

On December 10, 2014 this question was addressed by the State Fire Marshal Code Advisory Panel (FMCAP). After a thorough code review and discussion, the panel concluded that annual inspection and testing of swinging fire rated doors is not required by the 2015 MSFC. However, required fire rated doors must be maintained in operable condition in accordance with NFPA 80.

Rationale

When the MSFC references a nationally recognized standard, it either adopts the standard in its entirety or references specific sections for adoption. In the case of fire rated doors, MSFC Section 703.2 requires opening protectives to be "maintained in operative condition in accordance with NFPA 80." Thus NFPA 80 is not referenced in its entirety. Instead, only the maintenance and operability sections of NFPA 80 are applicable, and it should not be assumed that specific testing and inspection requirements apply.

Furthermore, the mandate for inspection and testing of fire rated doors is directly addressed in Section 703.4 of the 2015 MSFC.

> **703.4 Testing.** Horizontal and vertical sliding and rolling fire doors shall be inspected and tested annually to confirm proper operation and full closure. A written record shall be maintained and be available to the *fire code official*.

This section specifically addresses inspection and testing of fire doors, and notably does not include swinging doors. The FMCAP concluded that if the MSFC intended annual inspection and testing of swinging fire doors, such doors would have been included in Section 703.4. The fact that swinging doors are excluded from this section indicates that annual inspection and testing is not required, and is consistent with past editions of the MSFC.