



Department of Energy

Brookhaven Site Office

P.O. Box 5000

Upton, New York 11973

OCT 01 2019

Dr. Doon Gibbs, Director
Brookhaven Science Associates, LLC
Brookhaven National Laboratory
Upton, New York 11973

Dear Dr. Gibbs:

SUBJECT: ASSIGNMENT OF AUTHORITY HAVING JURISDICTION (AHJ) FOR FIRE PROTECTION AT BROOKHAVEN NATIONAL LABORATORY (BNL)

- References:**
1. Letter from F. Crescenzo, SC-BHSO, to D. Gibbs, BSA, Subject: Delegation of Authority Having Jurisdiction (AHJ) from the Brookhaven Site Office (BHSO) to Brookhaven National Laboratory (BNL), dated November 18, 2015
 2. DOE Order 420.1C, Change 2, *Facility Safety*
 3. DOE-STD-1066-2016, *Fire Protection*

DOE Order 420.1C, Change 2, *Facility Safety*, delegates the roles and responsibilities of the Fire Protection Authority Having Jurisdiction (AHJ) and Building Code Official (BCO) to the Department of Energy (DOE) Head of Field Element. Due to their nature, the Fire Protection AHJ duties are not considered inherently Federal functions, and are typically assigned to and performed by experienced professionals and qualified fire protection engineers, as required by DOE Order 420.1C, Change 2, and DOE-STD-1066-2016.

As permitted by DOE-STD-1066-2016, *Fire Protection*, I am assigning the AHJ and BCO functions (hereafter referred to collectively as "AHJ") for Fire Protection to the Brookhaven Science Associates (BSA) Manager of Fire Protection Engineering to act as the representative for routine activities. The assigned AHJ functions are applicable only to facilities and operations outlined in the contractor's requirements document unless otherwise modified by the Brookhaven Site Office (BHSO). It is critical that this individual has the appropriate level of training and qualifications to execute this respective designated role. If at any time, the assigned Fire Protection AHJ believes that they cannot adequately carry out this designation, the assigned Fire Protection AHJ is expected to immediately engage BHSO. Any organizational changes affecting the assigned AHJ position shall be submitted to BHSO within 14 calendar days of the change with an assurance that the AHJ function has not been impacted.

In general, the assigned AHJ is responsible for enforcing the requirements of a code or standard, or for approving equipment, materials, an installation, or a procedure.

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It is expected that the assigned Fire Protection AHJ be completely independent from decisions being reviewed and shall not have any relationship to design or organizations creating designs or activities supported as a Subject Matter Expert (SME).

The assigned Fire Protection AHJ may further assign qualified personnel (as defined by References 2 and 3) in writing with a copy to this office, for routine activities, such as those related to issuance of permits, review and approval of construction documents and shop drawings, system acceptance testing, and facility acceptance inspections for approval of occupancy. In such instances, the assigned AHJ designee remains accountable for the appropriateness of such actions undertaken on their behalf. It is this office's understanding that the Laboratory Fire Safety Committee (LFSC) will act as an advisory committee to the assigned Fire Protection AHJ.

Appropriate documentation, including determinations made by the assigned AHJ, shall be generated and retained for all designated Fire Protection AHJ activities, and such documentation shall be made available to BHSO for information and review. Records of technical justifications must be maintained and reevaluated for appropriateness as activities or operations change.

A process for developing and requesting DOE AHJ approval of fire protection equivalencies and exemptions to fire protection requirements must be in place and implemented. Equivalencies to national consensus codes and standards shall be submitted on an annual basis to BHSO for review. Equivalencies to DOE Orders and Standards, Exemptions, and Alternative Approaches shall be coordinated with BHSO prior to submittal for approval. DOE retains the right and ultimate authority in fire protection, life safety, and building code matters to override decisions made by the contractor, including the interpretation and application of DOE orders, guides, standards, and national consensus codes and standards.

This assignment supersedes the fire and life safety section of the referenced letter, and will continue until rescinded, amended, or superseded in writing. Please contact Maria Dikeakos, of my staff, at extension 5434 with any questions.

Sincerely,



Robert P. Gordon
Site Manager

- cc: M. Dikeakos, SC-BHSO
- F. Fernandez, SC-BHSO
- J. Brock, SC-BHSO
- A. Clifton, SC-BHSO
- C. Seniuk, SC-BHSO
- J. Sellers, SC-OR
- J. Anderson, BSA

- M. Clancy, BSA
- S. Coleman, BSA
- T. Daniels, BSA
- K. Fox, BSA
- M. Kretschmann, BSA
- R. Lebel, BSA