

DOE OE Energy Storage Systems Safety Roadmap Focus on Proposed Changes to the ICC International Codes Special Briefing Paper – Unofficial Hearing Results April 2018

The goal of the DOE OE ESS Safety Roadmap¹ is to *foster confidence in the safety and reliability of energy storage systems (ESSs)*. Three interrelated objectives support the realization of that goal: research, codes and standards, and communication/coordination. The objective focused on codes and standards is as follows:

To apply research and development (R&D) to support efforts that are focused on ensuring that codes and standards are available to enable the safe implementation of ESSs in a comprehensive, non-discriminatory and science-based manner.

The following activities support that objective and realization of the goal:

- a. Review and assess codes and standards that affect the design, installation, and operation of ESSs.
- b. Identify gaps in knowledge that require research and analysis that can serve as a basis for criteria in those codes and standards.
- c. Identify areas in codes and standards that potentially need revision or enhancement and can benefit from activities conducted under R&D.
- d. Develop input for new or revisions to existing codes and standards through individual stakeholders, facilitated task forces, or through laboratory staff supporting these efforts.

The purpose of this special briefing paper is to support the above objective by providing information about current and upcoming efforts being conducted by U.S. standards developing organizations, specifically code changes associated with the 2018 Group A International Codes (I-Codes) of the International Code Council (ICC) that are relevant to ESSs.

Proposed changes to the I-Codes were posted by the ICC on February 28, 2018. Public hearings (committee action hearings) on those changes were held from April 15 to 25, 2018, in Columbus, Ohio. PNNL staff undertook a cursory review of the proposed changes (the code change monograph contains over 2500 pages), identified proposed changes that are relevant to ESSs and provided the results of that cursory review in a Special Briefing Paper in March 2018 (PNNL-SA-133206/SAND2018-2970R).

The intent of the prior Special Briefing Paper was to reduce the need for those interested in ESSs to review the entire monograph to find ESS-relevant changes, to allow them instead to focus on the assessment of the proposed changes, and, if desired, to participate in the ICC code development process. The purpose of this April 2018 Special Briefing Paper is to report on the results of those public hearings with respect to the proposed changes previously identified as being related to energy storage systems.

The following table identifies and provides a brief synopsis of the ESS-relevant changes (*and where necessary a comment about why the change has been identified as being ESS-relevant*) and the unofficial results from the April public hearings (note that none of the changes covered received a floor motion) as reported at <https://www.cdpaccess.com/live/cah/listing/>. No attempt to analyze the changes has been made nor have the authors indicated a position on any of the changes. More in-depth review and analysis of these changes is left to the reader as deemed appropriate as is the effort to review the official results of the public hearings when they are published by ICC and/or to submit a public comment on any of the proposed changes.

¹ DOE OE Energy Storage Systems Safety Roadmap, PNNL-SA-126115 | SAND2017-5140 R

Code Change Number	Summary of the Code Change	Committee Action
FS26-18	Adds a new exception to code provisions applicable to exterior walls that serve as part of a required fire-resistance-rated separation for exterior walls required to be fire-resistance-rated per Section 1206 of the International Fire Code (IFC) for enclosing ESSs.	As Submitted
G8-18	Adds a new definition of “motor vehicle” to eliminate confusion about what types of vehicles are covered by code sections applying to motor vehicles (<i>changes related to vehicles MAY be relevant to ESSs where the vehicles are electric or have on board systems that can generate power</i>).	Disapproved
G13-18	Proposed changes relate to parking garages and having all public garages meet Section 406.4 of the International Building Code (IBC) as well as Sections 406.5 or 406.6 when open or enclosed respectively; and then having private garages meet Section 406.3 (<i>changes related to garages MAY be relevant to ESSs where the vehicles are sources of building power</i>).	As Submitted
G16-18	Adds a new definition of liquid fuel or compressed gas motor vehicle for use in conjunction with parking garage classification as to use group (<i>classifying motor vehicles in this manner would appear to eliminate application of certain code provisions to electric vehicles, which, without this change, would continue to be considered motor vehicles</i>).	Disapproved
G17-18	Adds “ESS in dedicated use buildings” to the list of building types that are considered moderate-hazard factory industrial, Group F-1 buildings.	As Submitted
G24-18	Adds “electrical room” to the list of uses included in low-hazard storage Group S-2 occupancies.	Disapproved
G91-18	Adds a new footnote to certain incidental use rooms/areas for the purpose of separation and/or protection requirements. One such room/area is “electrical installations and transformers,” which currently refers to selected sections of NFPA 70. The new footnote points to Chapter 6 of the IFC for additional construction requirements for those rooms/areas. Note that the table addresses rooms/areas with stationary storage battery systems but the new footnote is not applied to them.	Disapproved
G92-18	Deletes the stationary storage battery system room/area requirement from the table providing required separation and/or protection requirements (the reason is the anticipated revision of Section 1206 of the IFC covering ESSs that will include those separation and protection requirements).	As Submitted
G151-18	Adds a new Section 3114 to the IBC covering intermodal shipping containers that are repurposed for use as buildings or structures or as a part of a building or structure, but includes an exemption for stationary storage battery arrays located in such containers complying with Chapter 12 of the IFC.	As Modified
S22-18	Adds new provisions to Chapter 17 about Special Inspections that electrical components, appliances, equipment, and systems governed by NFPA 70 must be inspected by an approved special inspector with expertise in NFPA 70 and electrical construction.	Disapproved
F3-18	Adds water as a component of certain battery types (lead acid and Ni-Cd) in the definition of those battery types.	As Submitted
F18-18	Adds a new section to the IFC to address storage of new or off-specification Li-ion batteries and also to include such storage areas as high-hazard Group H-2.	Disapproved
F42-18	Adds Group F-1 and S-1 occupancies over 500K s.f. to those required to have a fire command center for fire department operations (see G24-18 that adds ESS dedicated use buildings to those considered Group F-1).	As Modified
F59-18	Removes Section 601.2 of the IFC related to securing permits for battery systems (because those are in Chapter 12 of the IFC and are therefore a duplication).	As Submitted
F68-18	Requires that electrical equipment, wiring, and systems be installed, used, and maintained in accordance with NFPA 70 and provisions in Sections 604.2 through 604.11 of the IFC.	As Submitted
F137-18	Adds a new exception for normally unoccupied, stand-alone telecommunications structures less than 1.5k s.f. in gross floor area to Section 907.2.22, which requires an automatic smoke detection system in areas containing stationary battery systems.	Disapproved

Code Change Number	Summary of the Code Change	Committee Action
F168-18	Adds a reference in Section 911.1 to NFPA 68 for deflagration venting and then adds a new special use for ESSs to Tables 414.5.1 and 911.1 listing explosion control requirements and a reference to Section 1206 where explosion control is required (for ESSs barricade construction is not required when deflagration venting or an explosion prevention system is required).	As Submitted
F190-18	Adds repair, commissioning, and decommissioning to the scope of Chapter 12 (energy systems used for generating or storing energy) and further refines how “the aggregate kWh of energy” in a fire area is determined by changing it to “the aggregate nameplate kWh of all ESSs” in a fire area for the purpose of determining the threshold quantity of an ESS in determining if and to what degree provisions in the IFC apply to the ESS.	Withdrawn*
F191-18	Includes compliance with Section 604 of the IFC, which contains relevant provisions for electrical wiring and equipment used with energy systems.	As Submitted
F202-18	Adds an exception to Section 1205 covering stationary fuel cell power systems that would allow the temporary use of a fuel-cell-powered electric vehicle to power a Group R-3 or R-4 dwelling, while parked in an attached or detached garage when in conformance to the vehicle manufacturer’s instructions and NFPA 70.	As Submitted
F203-18	Represents a complete comprehensive revision of the provisions in the IFC that cover ESSs (developed by the ICC FCAC’s ESS work group).	As Modified
F204-18	Clarifies when construction and operational permits are required for stationary and mobile ESSs. Also exempts lead acid and Ni Cad battery systems less than 50 VAC/60 VDC under the exclusive control of a communications utility.	Withdrawn*
F205-18	Eliminates the need for a permit to operate stationary storage battery system.	Disapproved
F206-18	Modifies provisions for ESSs (eliminates consideration of explosions in battery cabinets in occupied work centers when doing a Hazard Mitigation Analysis (HMA), when the fire code official is authorized to approve larger capacities and/or smaller array spacing by adding a reference to UL 9540 and adding an exception to required fire-extinguishing systems when the stationary storage battery system is in an unoccupied, non-combustible container located outdoors housing only ESS equipment).	Withdrawn*
F207-18	Changes the reference standard for listing and labeling battery chargers from UL 1564 to UL 1741.	Withdrawn*
F208-18	Adds an exemption from required smoke detection systems in rooms containing stationary storage battery systems for lead acid and Ni Cad battery systems less than 50 VAC/60 VDC under the exclusive control of a communications utility.	Disapproved
F209-18	Adds additional detail for spill control and neutralization of electrolyte or other hazardous material spills in areas containing stationary storage battery systems. It is specifically for free-flowing electrolytes, making the provision applicable when individual vessels exceed a 55 g capacity or the aggregate capacity is over 1 kg, A spill from the largest individual cell or block would be required to be neutralized to between 5.0 and 9.0 pH.	Disapproved
F210-18	Adds a new Section 1206.4 that provides criteria for the installation of ESSs on the outside of exterior walls of a building. Also adds a new section to include provisions for a full-scale fire test of ESS in accordance with UL 9540A and including criteria for how the test is to be conducted, witnessed, and reported.	Withdrawn*
F211-18	Adds a new section to include provisions for a full-scale fire test of ESSs in accordance with UL 9540A and including criteria for how the test is to be conducted, witnessed, and reported (<i>appears to be identical to that proposed in F210-18</i>). Also provides an exemption for ESSs in Group R-3 and R-4 occupancies when they comply with a proposed new section that provides criteria specific to ESS safety in these building types.	Withdrawn*
F249-18	Covers batteries in Chapter 31 relative to their use in conjunction with tents, air-supported structures, and temporary special event structures. The IFC currently requires them to be disconnected in an approved manner and the proposed change would modify the text to require disconnection unless the fire code official requires the batteries to remain connected to maintain safety features.	As Submitted

Code Change Number	Summary of the Code Change	Committee Action
F251-18	Adds Li-ion batteries as a product in the commodity classifications table (3203.8) and includes a classification of those batteries as high-hazard.	As Submitted

*** IMPORTANT NOTE – THESE WITHDRAWN CHANGE PROPOSALS WERE INCORPORATED INTO F203-18 THROUGH MODIFICATIONS MADE TO THAT CODE CHANGE PROPOSAL.**

Additional Resources

For more information about the code development process, [click here](#).
 Unofficial results can be found at <https://www.cdpassess.com/live/cah/listing/>.

An Important Note to Readers

Every effort is made by PNNL and Sandia¹ staff to ensure the accuracy of the information presented in this report. For more information about the ESS Safety Roadmap efforts visit <http://www.sandia.gov/ess/>. For questions related to this document please contact david.conover@pnnl.gov.

1. Sandia National Laboratories is a multi-mission laboratory managed and operated by National Technology and Engineering Solutions of Sandia, LLC, a wholly owned subsidiary of Honeywell International, Inc., for the U.S. Department of Energy's National Nuclear Security Administration under Contract DE-NA0003525.