

JUL 7 7:54 AM '94  
CPSC 1994 (b)(1) Cleared  
No. 7/18/94  
Products: Underwriters Laboratories  
Requested by: \_\_\_\_\_  
Approved: \_\_\_\_\_  
Comments: \_\_\_\_\_

**LOG OF MEETING  
DIRECTORATE OF ENGINEERING SCIENCES**

SUBJECT: Heat Tape Safety Measures Study by Underwriters Laboratories

DATE OF MEETING: June 15, 1994

PLACE OF MEETING: CPSC Engineering Laboratories

LOG ENTRY SOURCE: Erlinda M. Edwards, ESEE *emt*

COMMISSION ATTENDEES:

Bob Northedge, ESEE

Dennis McCoskrie, ESEE

Nicholas Mogan, ESEE

Larry Moskowitz, ESEE

Erlinda M. Edwards, ESEE

NON-COMMISSION ATTENDEES:

Kenneth Shell, Raychem

Andrew Krulwich, Wiley, Rein & Fielding

SUMMARY OF MEETING:

CPSC staff indicated that the purpose of the meeting was to discuss the Heat Tape Safety Measures Study performed by Underwriters Laboratories (UL), including tests performed and results obtained.

In response to a question from Mr. Krulwich regarding the briefing package schedule, staff indicated that a briefing package to the Commission will be submitted to upper management for review and approval by the end of the month. However, it is not known when it would actually be sent to the Commission or when the Commission would likely be briefed on the Project.

Mr. Krulwich also inquired whether the public would have an opportunity to participate or comment on the briefing package. Staff stated that the briefing package would not be available to the public until after the Commission had received it and that there is no built-in mechanism for public comment.

CPSC staff explained briefly some history of the Project: To determine whether existing voluntary standards were sufficient, CPSC staff needed to understand the problems associated with heat tapes and in what ways they are involved in fires. This background was obtained through several sources including field investigations, collecting and examining samples, and interviewing experts. UL entered into a standard development process to address this product area. Results of testing of listed, residential heat tapes currently available on the market have demonstrated a very high quality. CPSC staff does not believe that the current standard will maintain the safety quality actually present in available products, and they intend to continue to monitor the progress of the standards process.

CPSC staff stated that they consider ground fault protection to be an integral part of the heat tape safety system. However, Department of Housing and Urban Development (HUD), which regulates mobile home construction, prohibits providing ground fault protection in the heat tape outlet.

CPSC staff explained that there is a Memorandum of Understanding between HUD and CPSC, which may be one avenue to permit or require ground fault protection of the heat tape outlet. Staff believes that fears which were first expressed by HUD in the 1970s--nuisance tripping which would leave water pipes unprotected from freezing--can be allayed; data from the Heat Tape Safety Measures Study and changes in the UL standard for GFCIs support the conclusion that GFCIs currently available on the market are not subject to the same nuisance tripping problems that prompted HUD's fears. Furthermore, the heat tape GFCI could be installed in the living space; it need not be located at the heat tape outlet under the manufactured home. In the meantime, CPSC is encouraging education programs promoting inspection of heat tapes and replacement, if necessary. One target group for this campaign is mobile home residents.

Mr. Shell expressed an interest in working with CPSC, UL and industry to recommend that the heat tape outlet be GFCI protected. This could be pursued for the 1996 National Electrical Code (NEC), which currently does not consider the heat tape outlet to be an outdoor outlet. Support from HUD would be very helpful in this regard. CPSC staff agreed that the chances of obtaining approval for this change in the NEC will be improved by multiple, independent recommendations to the NEC panel.

In response to Mr. Krulwich's question regarding industry representation of products tested in the Heat Tape Safety Measures Study, CPSC staff stated that all listed models (though not all lengths) of three major manufacturers were included in the study. Staff did not, however, test any listed, private-label heat tapes. Previous analyses of private-label heat tapes did not reveal any differences between them and the models distributed by the three manufacturers and, therefore, none were tested.

The remainder of the meeting was closed.