

Department of Energy

MEMORANDUM

Date: October 21, 1988

Subject: Knob-and-Tube Wiring: Revised Policy Superseding Guidance of 7/25/83 and 7/13/88

To: Support Office Directors

This correspondence is a follow-up to my September 7, 1988, memorandum which requested input from the support offices on the subject of insulating in homes which contain knob-and-tube wiring (KTW). The input received has been most useful and has provided practical information that may enable State grantees to continue to safely install thermal insulation in situations where KTW exists.

In light of the responses from the Support Offices and the further review we conducted, two important points need to be emphasized: (1) the National Electrical Code (NEC) and changes to it do not apply until adopted by State and/or local electrical code authorities; and (2) these bodies incorporate NEC guidance or changes to it into their electrical codes on a highly individual basis. In practice, this means that the NEC can be adopted exactly as promulgated or modified by State and/or local electrical code authorities.

In the KTW matter with which we are now concerned a number of States including Massachusetts, Nebraska and Washington, have looked at the issue and decided not to adopt the specific recommendations of the NEC on KTW. Instead, these States have adopted modified approaches which permit the continued installation of thermal insulation over KTW when certain inspection and safety procedures are followed.

In both the States of Washington and Massachusetts, for example, those procedures include an initial survey of the wiring system by a licensed electrician, repair as required, the use of Class I thermal insulation only and overcurrent protection in compliance with the ampacity tables developed by the NEC. These examples are cited because the approach taken by these States conforms to the general WAP policy that jurisdiction in health and safety matters related to program-funded work resides with State and/or local authorities. Attached, for informational purposes, is Washington State electrical code material dealing with KTW that was sent by the Richland Support Office (RSO). That material consists of the following: (1) the August 15, 1988, Richland response to DOE-WAP on KTW issues and (2) an August 4, 1988, letter from the Washington State Department of Community Development to the RSO which describes the recently-revised Washington State electrical code procedures that must be followed in the installation of thermal insulation in structures containing KTW.

In light of the above, the revised DOE-WAP policy on installation of thermal insulation around KTW is that it is the State's responsibility to ensure that such work be in conformance with the applicable codes in the jurisdiction where the work is being performed. Therefore, the KTW guidance issued on July 25, 1983, and on July 13, 1988, is superseded by this memo.

Please convey to your WAP grantees: (1) the revised DOE-WAP policy on installing thermal insulation around KTW, as stated in the previous paragraph; (2) the attached information on the 1987 National Electrical Code change related to KTW; (3) the Washington State material if you think it will be helpful in understanding how other States are handling KTW; (4) that those homes which were completed without insulation since July 13, 1988, may now be insulated under the revised policy. The prohibition against re-weatherization found in Section 440-13(e)(2)(i) will not apply to such insulation work and those homes may not be reported as new completions. In addition, each grantee should be advised to check with the appropriate electrical code authorities in its State to determine whether the NEC KTW change has been adopted as is, has been adopted with modifications, or has not been adopted and, therefore, whether any modification in KTW work performed under the WAP is required within the State.

Thank you for your assistance in this matter.

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Note - Attachments unavailable at this time