February 10, 2015

Mr. Roger Coffman
Lake County Health Dept.
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Subject: Negative Vote and Comment on NSF/ANSI 7 Commercial Refrigerators and Freezers (7i10r2)

Dear Mr. Coffman:

Thank you for your ballot and comment on NSF/ANSI 7 Commercial Refrigerators and Freezers (7i10r2). Below is your comment in italics and our response, in bold.

Submitter Comment: The provision for locking out the unit from sales during a power outage is not clear. Hinged doors would appear to need an electronic device to lock the door, but there would be no power to activate the lock. Propping the door open would also not allow the lock to activate. Battery backups for the locks would create other issues for food safety by putting possibly toxic batteries in the units. Sliding doors are not addressed, or excluded?

Submitter Proposal: The standard for this issue will need more evaluation to address issues in order to develop the necessary criteria. Recommend item be sent back to committee, and invite industry with these types of units for input

Response: The task group on Display Refrigeration met on March 13, 2014 to discuss your comment and proposal. First it is important to note that as currently written there is no immediate lockout in the event of a power failure. In the balloted draft, the performance test in 9.16 establishes two critical criteria:

- When the temperature in the food storage compartment increases above 41°F.
- When the 30-minute time interval is reached.

Whether or not the power is on or off is inconsequential. What matters are the time and temperature criteria. Once the temperature inside the food storage compartment increases above 41°F a timing mechanism is started. When the timing mechanism reaches the 30-minute mark, the door lock engages preventing the door from being opened. Until the >41°F for 30-minutes criteria is reached, the door can be opened and closed even if the power remains off. Once the door lock is engaged, the door cannot be opened until reset by an “operator/employee or service person” (see section 9.7.2). Following discussion and based on the above, the TG believes the automatic door lock performance test protocol is adequate as written.
I hope the above completely addresses your concern. However, if you are not satisfied with this response, please reply in writing (electronic is preferred) by February 24, 2015. If we do not hear from you by that date, we will presume your issue has been. If you have additional comments, or wish to discuss these points further, please feel free to contact me.

Thank you again for your thorough review. Your feedback is appreciated and has helped the task group in its work to update the standard.

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