National Aeronautics and
Space Administration

Ames Research Center
Moffett Field, CA 94035-1000

NRW 1400-69

June 17, 2016

Reply to Attn of: D:200-1

TO: NASA Headquarters
Attn: Associate Administrator for Mission Support Directorate

FROM: D/Center Director

SUBJECT: Request for NASA Requirement Waiver for NPR 1400.1G (3.4.2.6)

Ames Research Center is requesting a waiver from the NASA requirement to automatically remove all expired Center documents from the Center Directives Library. We are proposing mitigation steps to address the risks associated with a library containing outdated references and/or information.

Identification of Requirement:

Per NPR 1400.1G, NASA Directives and Charters Procedural Requirements, Section 3.4.2.6, CPD (Center Policy Directives) and CPR (Center Procedural Requirements) will automatically be removed from the Center Directives Library upon expiration, unless (1) a CPD or CPR replacing the directive being removed has been submitted for revalidation or for review and approval, in accordance with the Center's established process; or (2) the Responsible Office has requested an extension with justification. The current CPD or CPR may be granted an extension and remain effective until its revision is approved.

Proposed Waiver to Requirement:

Ames is implementing the following mitigation steps to identify, document and manage the risks of allowing expired Center documents to remain in the Center Directives Library:

1. The Center document is reviewed, and required changes are identified and documented by the office that has primary responsibility for the document. The office that has primary responsibility for the document assesses the risk of having outdated information vs. having no Center-specific information available. A justification and an estimated completion date for the revised Center document is provided to their organizational director.

2. The Organizational Director of the office with primary responsibility for the Center document distributes a memo to the Ames Quality Management System (AMS) Manager and the Center Directives Manager authorizing continued use of the expired document for a fixed period of time or until the updated Center document is approved, whichever is sooner. The memo includes:

a. Description(s) of changes or pending revisions
b. Results of the risk assessment
c. Justification for the delay
d. A firm date by which the Center document will be submitted for approval

With concurrence from the AMS Manager, the Center Directives Manager submits the memo to all organizational directors, Ames legal counsel, procurement, and the union to notify them of the expiration waiver. After a 15-day grace period, the memo is attached to the front of the existing directive in the Center Directives Library.

The Center Directives Manager works directly with organizational representatives of each directorate (AMS Working Group members) to track and manage expired Center documents. This group currently meets every week; however the standard cadence is monthly.

The Center Directives Manager reports the status of all expired Center documents to the AMS Manager as part of the regular reporting cycle. The AMS Manager reports this status to the Center organizational directors via the AMS Steering Committee. This group currently meets every month; however the standard cadence is quarterly.

Justification for Waiver Request:

The Center's 2015 Quality Audit, Assessment and Review (QAAR) identified many issues with our AMS and our supporting documented processes. We are committed to responding to the Agency's timeline and are currently working a significant number of corrective action line items across a number of areas for 50 audit findings. Across the Center, we have prioritized responses to critical and system-wide findings. In some cases, this has resulted in a delay to an organization's ability to prepare, peer review and submit updated Center documents for processing.

In addition to a large backlog of expired documents, the corrective actions for a number of QAAR findings call for the review of existing Center documents for potential updates or revisions. Our previous approval process for Center documents did not include adequate preliminary reviews, which resulted in documentation gaps and delays in the signature cycle. The proposed waiver provides the organizations with the time they need to adequately prepare, peer review, and submit updated Center document for processing. The proposed waiver also mitigates risks associated with Center personnel using expired documentation.

This request for waiver allows our organizations to address relevant NASA requirements and provides a timeline required to adequately prepare, peer review, and submit updated documentation for incorporation to our Center Directives Library. No additional risk to environmental, safety, health, or security is incurred as a result of this request.
Thank you for your consideration of this request. Please contact the AMS Manager (Maura Fujieh) or the Ames Center Directives Manager (Karen Moze) if you have questions.

Eugene L. Tu

~~Concurrence:~~ Nonconcur - See justification below:

Krista C. Paquin
for Associate Administrator,
Mission Support Directorate

Date 6/20/16

Justification: Paragraph 3.4.2.6 of NPR 1400.1 contains a provision to extend expired directives. Therefore, there's no need for Ames to authorize approval to use these documents in an expired state. The Ames QMS Coordinator was given guidance on extending the expired Ames directives with dates that will enable enough time to work with responsible offices to determine definitive and realistic timelines for revising these documents. Additionally, the QMS Coordinator was given instructions on how to implement controls that will prevent Ames directives from expiring in the future.