MISSION SUCCESS STARTS WITH SAFETY

NASA Safety Reporting System

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Chief, Safety and Mission Assurance

Date: 3/15/2012

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### DOCUMENT HISTORY LOG

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<th>Document Revision</th>
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**HOWI Author:** MSD/NSRS Program Manager/Eric Raynor  
**OSMA Staff Member Responsible for this HOWI:** MSD Director, Tom Whitmeyer  
**Customers for this HOWI:**  
- Internal: Chief/SMA  
- External: NASA personnel
1. Purpose
The purpose of the Office of Safety and Mission Assurance (OSMA) Headquarters Office Work Instruction (HOWI) is to document the administrative process for the NASA Safety Reporting System (NSRS).

2. Scope and Applicability
This HOWI applies to the OSMA and NASA Center staff members who manage or support the NSRS (and its support contractor) process and the OSMA management in their review of these efforts. The following personnel are involved with the management of the NSRS:
- The contractor-operated NSRS Administrative Office (NAO)
- The NASA HQ Office of Safety and Mission Assurance (OSMA)
  1. Chief, Safety and Mission Assurance (Chief SMA)
  2. Director, Mission Support Division (Dir. MSD)
  3. NSRS Program Manager (NSRS PM)
  4. NSRS Contracting Officer Technical Representative (NSRS COTR)
  5. Mission Support Division Staff
- Center and Component Facility Safety and Mission Assurance staff, as designated by the Center/Component Facility Director of Safety and Mission Assurance
- NSRS Report Authors (NSRS RA)

3. Definitions
3.1 Anonymous (with respect to the NSRS Process): NSRS RA’s identities will not be disclosed to NASA - except in cases where waste, fraud, abuse, or gross mismanagement have been alleged, in which cases identities will be provided directly from the NAO to the NASA Inspector General (IG). No information submitted by an NSRS RA will be used directly or indirectly as a means to purposefully identify any report author.
3.2 NSRS Administrative Office (NAO): The office of the NSRS support contractor who administers the NSRS program and works in close coordination with NSRS PM and the NSRS COTR.
3.3 NSRS Program Manager (NSRS PM): The lead civil-service program manager responsible for the overall administration of the NSRS program, ensuring the prompt and thorough investigation and satisfactory closure of all NSRS investigative case reports. This person is designated by the Chief SMA and reports directly to the Dir. MSD.
3.4 NSRS Report Author (NSRS RA): Person making the NSRS report, which can be a civil service employee, a NASA contractor, or a member of the general public.
3.5 Report Closure: The approval for closure of an NSRS investigative case by the NSRS PM and the Dir. MSD.
3.6 De-identified NSRS Report (dNSRS): An NSRS report that has been stripped of any references to the NSRS RA’s identity so as to protect the RA’s anonymity in reporting. This is done by the NAO prior to forwarding the report to the NSRS PM.
4. Reference Documents

The documents listed in this section are used as reference materials for performing the processes covered by the Quality Management System (QMS). Since all NASA Headquarters Level 1 (QMS Manual) and Level 2 (Headquarters Common Processes) documents are applicable to the QMS, they need not be listed in this section unless specifically referenced in this OSMA HOWI.

4.1 41 CFR Subpart 101-37.11: Accident and Incident Reporting and Investigation (Federal Property Management Regulations). [This reference only used if the National Transportation Safety Board is involved]

4.2 NPD 8700.1: NASA Policy for Safety and Mission Success.


4.4 NPR 8715.1: NASA Occupational Safety and Health Programs.

5. Flowchart
6. Procedure

**NOTE:** *ALL NSRS REPORT PROCESSING MUST ENSURE ANONYMITY OF THE NSRS RA.*

The NAO:

- Retrieves a new NSRS report from the NSRS mailbox
- Creates the dNSRS (by assigning an NSRS ascension number and removing identifying information concerning the NSRS RA from the report)
- Conducts and initial screening of the report for degree of urgency
- Checks to see if any previous NSRS reports have been submitted on the same or similar topics
- Forwards the dNSRS by secure, encrypted email (or fax with an authorized recipient standing by to receive the dNSRS) to the NSRS PM at NASA HQ.
  - Typically, the NSRS PM is alerted by telephone in advance to expect the incoming dNSRS. If the NSRS PM is not available, the Dir. MSD or the NSRS PM’s designated alternate is telephoned/contacted.
- The dNSRS includes the:
  - report ascension number
  - date the original report was received by the NAO
  - date the dNSRS was forwarded to the NSRS PM
  - topical area and location of concern
  - summary of potential for harm/consequences if no action is taken
6.1 NSRS PM Initiate Process:
Upon notification of a new NSRS report or receipt of a dNSRS, the NSRS PM initiates the investigative process.

6.2 NSRS PM New Report or Contract Monitoring (Monthly Status Reports)
If there is a new NSRS report, the process continues with step 6.03, if there is a new monthly status report, the process continues with step 6.15.

6.3 NSRS PM Review New Report:
- The NSRS PM reviews the dNSRS for completeness.
  - A complete dNSRS has adequate information provided to evaluate the reported concern.
  - This evaluation is based on the professional background and precedence/experience with previous, similar dNSRS’s evaluated by the NSRS PM and/or the Dir. MSD.
- The NSRS PM establishes/initiates and attaches a NSRS Action Log (Appendix B) to the dNSRS file.

6.4 NSRS PM Is Report Complete?
- If the NSRS PM identifies a need for additional information based on an initial review of the dNSRS, then the dNSRS is returned to the NAO for additional data gathering*. Otherwise, the process continues.
*The Action Log is updated if the dNSRS is returned to the NAO. If there is a need for additional information to clarify the understanding of the situation or to proceed with an investigation and/or resolution of the problem, the NSRS PM directs the NAO to obtain more information from the NSRS RA - this is known as a “callback.” In these cases, a callback to the NSRS RA (if NSRS RA can be identified) is completed as soon as possible after the NAO receives the request to do so from the NSRS PM. Callbacks may be required if the dNSRS does not adequately explain what, why, how, when, and under what circumstances the hazard or safety issue exists, or does not describe expected impacts if the hazard or safety issue is not corrected. Additional callbacks may be requested by the NSRS PM as required.

6.5 NSRS PM Determine Report Processing Level/Urgency:
The NSRS PM reviews each dNSRS for the following items to determine the appropriate next step in processing. (The Action Log is annotated accordingly to indicate if the dNSRS is out-of-scope, urgent processing, special processing, or normal processing.)
- The NSRS PM reviews the dNSRS for urgency/criticality. If the dNSRS appears urgent (for example, if it involves current in-space human flight activities or upcoming/pending NASA launch activities), the Dir. MSD is immediately notified about the dNSRS. Immediate remedial action may be required.
- A dNSRS that is deemed to be out-of-scope is closed out. Out-of-scope dNSRS’s do not deal with a safety problem covered by the NSRS. The NSRS PM and/or the Dir. MSD may decide to refer such cases to other NASA organizations or non-NASA entities for information and action as appropriate.

- The NSRS PM determines if a dNSRS requires any special handling or processing. Examples of such instances may include (but are not limited to) a dNSRS which contains:
  - national security, classified, or sensitive but unclassified information
  - personally identifying information which, if removed from the dNSRS, would make it difficult or impossible to adequately investigate
  - alleged criminal activity (Note: reports involving alleged criminal activity require that the NASA IG office be notified immediately.)
  - content involving very high profile NASA or contractor personnel.

6.6 Dir. MSD Initiate Immediate Remedial Action:

The Dir. MSD (or the NSRS PM, at their behest) notifies the NASA SMA Offices and NASA management officials that are/should be involved with the NSRS report. Notification will be limited to the general nature of the report and any possible immediate remedial action that may be required. The selection of persons who are notified is based on the nature of the NSRS report (the breadth of the problem and its potential effects) as well as precedence used in handling. The Dir. MSD maintains anonymity of the NSRS RA. The goal of this notification to initiate immediate remedial action is to prevent further hazard propagation, not to investigate the reported problem.

6.7 NSRS PM Special Processing:

The NSRS PM will define any special processing needed for the dNSRS and add cover instructions to the report as required. The NSRS PM will ensure that the special processing is maintained throughout the investigation of the dNSRS.

6.8 NSRS PM Return to NAO as Out-of-Scope

The NSRS PM returns the dNSRS to the NAO with direction that the report is to be identified as out-of-scope and closed out.

6.9 NSRS PM Report Processing

The NAO retains the original NSRS report form and then returns the identification strip to the NSRS RA.

The NSRS PM adds the report ascension number and investigative status to the NSRS status web page at http://www.hq.nasa.gov/office/codeq/status/. The NSRS PM notifies the Dir. MSD and other OSMA personnel having interest in the reported incident.

6.10 NSRS PM Initiate/Update Investigation:

The NSRS PM deliberates with the Dir. MSD (and other OSMA personnel having interest in the reported incident) to determine how the dNSRS should be investigated and by whom it will be investigated. The goal of the investigation is to determine whether or not there actually is a safety issue or hazardous situation, and, if so, determine how best to mitigate and correct the problem, prevent further safety hazard propagation, and to investigate in such a way as to not lay blame or to uncover the identity of the reporter. The initial assessment to determine how to investigate and who should investigate is influenced by several factors which include:
- Criticality/Scope – how urgent and/or widespread does the safety situation or hazard appear to be? At what levels of management has the NSRS RA previously tried to address or resolve the concern?

- Subject Matter/Content – does the specific nature of the concern appear to effect institutional, programmatic, and/or functional types of activities?

Based on the initial assessment results, the NSRS PM assigns an individual or team of individuals to investigate and/or execute appropriate corrective action measures. These individuals or team members are typically chosen from among a pool of pre-existing designated OSMA and Center civil service safety personnel at NASA, but can also include representatives from other NASA program and functional disciplines. In cases where a team is formed to investigate and/or execute corrective actions, a lead investigator/action officer(s) is identified to conduct the overall investigation and/or corrective action process.

The investigation and corrective action process will identify if a valid safety issue is discovered, and, if so, will oversee the development and implementation of a corrective action plan and will track to closure the completion of corrective actions.

Generally, a written status report is due to the NSRS PM every 30 days until the issue is satisfactorily resolved. (More frequent reporting may sometimes be required in cases where the nature of the concern requires more urgent processing.) The Action Log and NSRS status web page are updated as required throughout this process step, to show assignments made and directions given.

**Note:** This step may also be reached as an output of step 6.13 or 6.17. In these steps additional guidance or direction was determined to be needed for the processing or closure of the dNSRS. This may be due to timeliness, other similar reports, unacceptable closeout rationale, or any other reason deemed necessary in the professional opinion of the NSRS PM, the Dir. MSD, or the Chief SMA. The NSRS PM provides the additional guidance to the lead investigator.

**Note:** The NAO is not authorized to discuss any dNSRS with anyone besides the NSRS PM or the Dir. MSD - dNSRS investigators must direct any questions about dNSRS to the NSRS PM or Dir. MSD.

6.11 NSRS PM Review Closure Recommendations:

Once the investigation and all corrective actions have been completed, the dNSRS investigative lead provides a recommendation for closure of the dNSRS, along with a closure rationale in writing, to the NSRS PM. Justification of the dNSRS investigator(s) closeout recommendation is based on the input and concurrence of NASA Center senior management and safety officials. A closure recommendation from a dNSRS investigator should be submitted using the NSRS closure format template and generally requires three concurrences/signatures before it will be considered for closure by the NSRS PM:

1) The concurrence/signature of the dNSRS investigator leading the investigation,

2) The concurrence signature of the Center/Component Facility SMA Director at the facility where the hazard has been identified and investigated, and

3) The concurrence/signature of the line-manager who resides at a management level one step above the level where management decisions would normally be made for the process in question.
The NSRS PM reviews the closure package and coordinates it with NASA Headquarters personnel that have responsibility in the reported area as well as the Dir. MSD. The time required to officially complete the close out of a report may vary depending on the nature of the report. Generally, reports are not closed by the NSRS PM until all evidence of corrective action to resolve the problem has been provided/documentated.

When the report is ready to be closed, the NSRS PM then certifies the satisfactory resolution of the safety issue in writing on the Action Log. The NSRS PM can then recommend closing the file to the Dir. MSD.

6.12 Dir. MSD Review of Closure:
The Dir. MSD will indicate concurrence with the NSRS PM’s recommendation by signing the Action Log. If resolution questions remain, the issue may be raised to higher organizational levels for resolution, including the Deputy or Chief SMA or the NASA Administrator, or referred to another NASA Headquarters organization or Center for evaluation.

6.13 Dir. MSD Acceptable?
If the closure is acceptable, then Dir. MSD signs the Action Log and the dNSRS is closed out. Otherwise, the NSRS PM is directed to continue the investigation process.

6.14 NSRS PM Closeout Report:
After approval, the NSRS PM completes and signs the NSRS Report Action Log which has been included as a cover sheet for the report (see Appendix B for a sample). The NSRS PM assigns final classification and status codes and updates the NSRS status page accordingly. The dNSRS investigative file and records are forwarded to the NAO for secure storage and safekeeping. The NSRS PM and NAO co-sign the “Transfer of NSRS Report” form to record this step. (See Appendix B.)

*The NSRS Open Report Log is updated by the NAO.*

*The NAO will enter a summary of final resolution actions into the NSRS database along with the date of closure for all NSRS issues, completing the action on the report. When quality records have been filed, then the process is closed out.*

6.15 NSRS COTR Process Log
The COTR for the NAO Contract reviews the submitted monthly report log for contract compliance. Comments are appended to the log and forwarded to the NSRS PM.

6.16 NSRS PM Review Log
The NSRS PM reviews the COTR’s comments and verifies the accuracy of the monthly report log against the open and closed action report sheets. If changes are needed to the log, they are forwarded to the NAO for updating of the Open Report Log.

6.17 NSRS PM NSRS Open Actions
The NSRS PM reviews the monthly report log sheets for actions which are overdue, nearing their due date, or are identified as high profile reports. The lead for the investigation or the corrective action lead (see step 6.10) is contacted for status. After all open reports have been reviewed, the process is closed out.
7. Quality Records

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<td>NAO</td>
<td>CDs &amp; Hardcopy</td>
<td>Schedule: 8 Item: 103</td>
<td>Keep as long as report has reference value or destroy when 15 years old <strong>See Note</strong></td>
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<td>NAO</td>
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<td>Keep as long as report has reference value or destroy when 15 years old <strong>See Note</strong></td>
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<td>Schedule: 8 Item: 103</td>
<td>Keep as long as report has reference value or destroy when 15 years old <strong>See Note</strong></td>
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**Note:** Destruction of NSRS Reports may only be done with the permission of the NSRS PM or the NSRS COTR. Immediately prior to the end of the contract or upon direction of the NSRS COTR or Contracting Officer, all NSRS Records and NSRS Files being held by the NAO will be transitioned to the new contractor or returned to OSMA.
Appendix A: Safety Awareness:
The NSRS PM also maintains a list of representatives in each safety office at every NASA Center and Component Facility who are responsible for assisting with maintaining awareness of the NSRS program at their respective facilities by ensuring that NSRS posters, brochures, and reporting forms are readily and appropriately displayed and made available to NASA personnel in any building(s) at the facility where personnel routinely report for regularly scheduled work.

Appendix B: NSRS Forms
The NSRS forms to be used are presented on the following pages for:

- NSRS Action Log
- NSRS Report Transfer Form
- NSRS Report Closure Form
NASA Safety Reporting System (NSRS)
ACTION LOG

NSRS Report Accession Number:       Date Received at HQ:       ____
Topic: _________________________________

Preliminary Screening by HQ:  Assigned to:  Initial Reviews and Status by HQ:
☐ Critical  Prime  Coord.  Category:
☐ Urgent
☐ Routine  ARC  ______  ______
☐ Classified  DFRC  ______  ______  Facility Related
☐ Criminal  GRC  ______  ______  Program Related
☐ Out of Scope  GSFC  ______  ______
☐ Classified  JPL  ______  ______
Screened by:
☐ Classified  JSC  ______  ______
☐ Classified  KSC  ______  ______
☐ Classified  LaRC  ______  ______  Actual Flight Constraint:  Yes  ☐
☐ Classified  MSFC  ______  ______  No
☐ Classified  SSC  ______  ______
☐ Classified  OSMA  ______  ______
☐ Classified  Other  ______  ______

Website Classification Code(s)

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<th>Due Date</th>
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Approval of closure of this NSRS action:

Concurrence:       Date:       ___
NSRS Program Manager

Approved for Closure:  Date:  ___
Director, Mission Support Division
Office of Safety and Mission Assurance

Page ___ of ___
Please note: This page contains NASA Safety Reporting System sensitive data with access limited to personnel who require such information for the resolution of this NSRS action.

CONTINUATION SHEET

NSRS Report Accession Number: _________________

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Page ___ of ___
CONTINUATION SHEET
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</table>
Section 1 – Actor
1. Software
2. Hardware (including Facility Structure)
3. Workplace Environment
4. Weather Environment
5. Natural Phenomenon
6. External to Agency
7. Individual Person
8. Teams
9. Communication
10. Goal
11. Guideline or Handbook
12. Policy
13. Practice (Standard Practice)
14. Procedure/Instructor
15. Process Method
16. Requirement
17. Resource(s)
18. Specification/Criteria
19. Standard
20. Task/Job

Section 2 – Events
1. Correct Action
2. No Action
3. Incorrect Action
   1. Direction Incorrect
   2. Distance Incorrect (too far, not far enough)
   3. Frequency Incorrect (too often, not often enough)
   4. Improper Imprecision
   5. Inadequate Action / Not Supposed to Occur
   6. Incomplete (partially complete)
   7. Location Incorrect
   8. Mode Incorrect (wrong mode, environment)
   9. Quality Incorrect
   10. Sequence Incorrect (incorrect order)
   11. Speed Incorrect (too fast, too slow)
   12. System Recipient Incorrect (performed on / to wrong system)
   13. Timing Incorrect (too early, too late)
   14. Human Incorrect Action

Section 3 – Conditions
1. Accessible
2. Available
3. Authorized/Approved/Accepted
4. Clear (Easy to Understand)
5. Cohesiveness High
6. Cohesiveness Low
7. Complicated, Complex
8. Contingency or Conflicting
9. Convenient to Use
10. Cramped/Confined
11. Difficult to Use (Physically or Mentally)
12. Dissimilar
13. Easy to Use (Physically or Mentally)
14. Exist, Exist, Continue
15. Expired, Obsolete, Wrong Revision
16. Frequently Used
17. Inaccessible
18. Inconvenient to Use
19. Ineffectively Used
20. Invalid
21. Misunderstood, Misjudged
22. New
23. No Traceability (not traceable)
24. Nonexistent (when required to exist)
25. Not Accountable, Not Responsible
26. Not Adaptable
27. Not Certified
28. Not Clear (Housekeeping)
29. Not Correctable
30. Not Detectable
31. Not Enforceable
32. Not Implemented or Exercised
33. Not Ready for use
34. Not Required
35. Not Standard
36. Not Used
37. Old (worn out)
38. Overlapping
39. Overload
40. Redundant
41. Reliable
42. Rigid (Not Flexible)
43. Sharp
44. Similar
45. Simple
46. Slippery
47. Stable
48. Unadaptable
49. Unanticipated/Not Identified
50. Unauthorized/Unapproved/Unaccepted
51. Unavailable
52. Unclear
53. Underloaded
54. Unnecessary
55. Unprofitable
56. Unreliable
57. Unsafe
58. Unstable
59. Unverifiable
60. Vague, Ambiguous, Unclear
61. Valid
62. Verifiable

4. Failed or Changed State
   1. Chemical
   2. Electrical/Electromechanical
   3. Fluid
   4. Mechanical
   5. Structure
   6. Thermal Radiation
   7. Human Physiological, or Psychological Failure
   or Changes in State
DATE:

SUBJECT:  Transfer of NSRS Report(s) # __________________________

The above referenced NSRS reports have been approved for closure by HQ/OSMA/MSD.

A signed NSRS Action Log and all original documentation for the above referenced NSRS reports have been officially transferred to Futron Corporation for closure.

____________________________
NSRS Program Manager

____________________________
Futron Representative

Enclosure(s)

DATE: DAY/MONTH/YEAR

TO: Program Manager, NASA Safety Reporting System
   Office of Safety and Mission Assurance, NASA Headquarters

SUBJECT: NSRS XXX Investigation & Recommendation for Closure

PLEASE NOTE: This memorandum contains NASA Safety Reporting System (NSRS) information with access limited to persons who require this information for the resolution of this NSRS action.

Background: Re-state in a concise summary the concerns expressed in the original NSRS report. The Reporter of NSRS XXX (received from XXX on DAY/MONTH/YEAR) was concerned that…

Investigative Method: Explain the timeline and steps taken to substantiate and/or corroborate the facts reported in the NSRS report – include such things as who you consulted with on your investigation (by name and functional title), and what if any additional documents you reviewed.

Investigative Findings & Recommendations: Explain what your investigation revealed. Were you able to substantiate and/or corroborate the facts in the report? Is there indeed a safety hazard or issue that requires immediate mitigation and/or longer-term corrective action? What needs to be done to resolve the problem and prevent its recurrence?

Completion of Mitigations/Corrective Actions/Evidence of Recurrence Effectiveness Control: Explain the timeline and steps taken to mitigate any immediate safety hazard as well as longer-term corrective actions to prevent recurrence of a similar nature. For example, in addition to fixing the actual hazard, did you also change or institute a policy, or install a machine guard on a piece of equipment, or order new personal protective equipment, or need to re-educate the affected population via a training bulletin? PLEASE NOTE: NSRS reports are never closed until all remediation has been completed.

Other/Attachments: Is there anything else you would like the NSRS Program Manager and/or NASA HQ OSMA to know about your investigation and results? Please list the titles of any supporting documentation as appropriate.

Signatures: Please contact the NSRS Program Manager to discuss whose signature(s) (investigative and/or corrective action officers) should be on this report.

Finally, Please Note: An NSRS report is not officially “closed” until the NSRS Program Manager AND the Division Director, Mission Support Division in the Office of Safety and Mission at NASA Headquarters have reviewed and approved the report for closure – the NSRS Program Manager often seeks independent technical verification and validation of the report content before recommending it to the Division Director for closure. The most frequent reasons for rejecting reports for closure include:

1) Corrective actions are incomplete
2) Expected signatures not provided
3) NASA HQ OSMA is not satisfied with the investigation approach or the type or degree of mitigations or corrective actions taken.
4) Incomprehensible technical language (acronyms not spelled out in first usage, etc)

If you are ever in doubt as to whether your report is going to be acceptable for final closure at HQ, you are welcome to submit a final draft, without signatures, to the NSRS Program Manager for pre-closure review and comment. (This pre-screening will not guarantee that your final report will be accepted as-is for closure, but it helps in identifying area that lack clarity or missing details.) If you have any further questions about how to format or submit this report, please contact: Mr. Eric Raynor, NSRS Program Manager, at 202-358-4738 or eric.c.raynor@nasa.gov