

National Aeronautics and
Space Administration
Headquarters
Washington, DC 20546-0001



July 28, 2010

NRW 1400-23

Reply to Attn of: Office of Strategic Infrastructure

TO: Assistant Administrator for Internal Controls and Management Systems

FROM: Assistant Administrator for Strategic Infrastructure

SUBJECT: Waiver from NPR 1400.1D requirement for NPR 7900.3 revision

The Office of Strategic Infrastructure (OSI) is requesting a waiver from NPR 1400.1D paragraph 3.2.1d which requires there only be one "shall" statement per paragraph. During revision of NPR 7900.3 in 2007, the Aircraft Division worked closely with the Office of General Counsel to craft many of those statements so that the implementing Centers could easily attribute what the requirements were and who was responsible for ensuring compliance. Additionally, an alternate solution of implementing a requirements compliance matrix was adopted. The requirements compliance matrix lists the numbered requirements, the paragraph and exact verbiage. It also identifies the responsible party and how compliance with the requirement is accomplished. For the last 3 years, both reviewers and operators have found the compliance matrix solution beneficial.

The upcoming revision refines the standard approach for the management and use of aircraft in NASA Flight Operations. All new requirements have been incorporated in the compliance matrix in Appendix K. OSI requests that this alternative be accepted and that the requirement of one "shall" statement per paragraph be waived.

Should you have any questions or further explanation regarding this request please contact Fatima Johnson, Directive Manager for OSI, and can be reached at 202-358-1631.

Susan Kenney
for
Olga M. Dominguez

Approved by:  8/2/10

Jennings, Nanette (HQ-LP030)

From: Johnson, Fatima C. (HQ-LD000)
Sent: Friday, July 30, 2010 12:02 PM
To: Jennings, Nanette (HQ-LP030)
Subject: Fw: NPR 7900 Chapter 4

From: Batkin, Mark (HQ-MB000)
To: Schlatter, Richard (HQ-LD010)
Cc: Walker, Joseph (HQ-LD010); Abbed, Jamal S. (HQ-LD010); Johnson, Fatima C. (HQ-LD000)
Sent: Wed Jul 07 09:52:05 2010
Subject: RE: NPR 7900 Chapter 4

Cub- I support the waiver request being considered.

You are correct – if each “shall” is required to have its own paragraph – application of the NPR would be negatively affected. There is no value added by amending the existing carefully crafted Chapter 4.

Mark

From: Schlatter, Richard (HQ-LD010)
Sent: Tuesday, July 06, 2010 12:07 PM
To: Batkin, Mark (HQ-MB000)
Cc: Schlatter, Richard (HQ-LD010); Walker, Joseph (HQ-LD010); Abbed, Jamal S. (HQ-LD010); Johnson, Fatima C. (HQ-LD000)
Subject: NPR 7900 Chapter 4

Mark –

As stated in my voice mail – NPR 1400 has a requirement that each “shall” statement have its own paragraph. As you may recall, OGC crafted the language in Chapt 4 (the Mission Management Flights chapter) a few years back. If the above requirement is strictly adhered to, many sections of Chapt 4 would have to be separated out into multiple shall statement paragraphs. We feel this would make the document less cohesive/readable and the meaning could be misinterpreted. An example is paragraph 4.4.3.1 which has four shall statements concerning mission required passenger designation. Therefore, we have requested a waiver and would ask that you write an email to Fatima supporting this position as justification for approval of the waiver. Let me know,

Thanks,

R.H. "Cub" Schlatter
Aircraft Operations
NASA HQ
202 358 1044