August 16, 2010

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

FROM: 106/Director, Langley Research Center


As Director of NASA’s Langley Research Center, the requirement waiver listed below is requested for the subject directive that has been revised and will be approved in the near future.

**Identification of Requirement:**
NASA Directives Procedural Requirements, NPR 1400.1, requires that all paragraphs in NASA Directives be numbered. Specifically, paragraph 3.6.1 states that “responsible offices shall……number all paragraphs.”

**Justification to Waive the Requirement:**
The Langley Management System Policy Manual is an overarching description of the Langley Management System, the basic framework of its design and implementation. It addresses the scope of the Center’s registration to both the ISO 9001 and AS9100 International Standards as well as defines key components of the management system that govern and ensure ongoing effectiveness of the Center’s products and services. The document format has been in effect since its inception in 1999 to promote ease of flow and understanding. Revision of the document to accommodate the prescribed paragraph numbering would change the character of the content and could result in misinterpretation of its intent and use as a high level Center policy especially since each paragraph does not represent a separate policy statement. LAPD 1000.1 does have a well-defined numbering system that along with a table of contents that provides effective reference and traceability through periodic updates and LMS document reviews as well as ongoing use of the document itself.
Based upon the purpose and use of the LMS Policy Manual (LAPD 1000.1), this document is regularly reviewed and updated to reflect ongoing refinements/improvements to the management system. It is requested that this waiver remain in effect through all future revisions. These waivers: 1) do not conflict with any other requirement, 2) are necessary to achieve the purpose of this directive, 3) have no cost or scheduling considerations and 4) have no risks that will incur once waivers are granted.

If you have any questions, please contact Kathryn C. Suddreth, LMS Management Representative, at 757-864-6093.

Lesa B. Roe

Concurrence:

Woodrow Whitlow
Associate Administrator Mission Support

31 August 2010
(Date)

cc:
NASA--LP000/T. S. Luedtke
NASA--LP030/L. G. Becker
106/OD
218/K. Suddreth

218/KCSuddreth:mjm 8-13-10 (46093)