

National Aeronautics and Space Administration

Langley Research Center
100 NASA Road
Hampton, VA 23681-2199



February 17, 2011

Reply to Attn of:

218

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

FROM: 106/Director

SUBJECT: NASA Requirement Waiver for NPR 1400.1 (3.5.2.6)

As Director of NASA's Langley Research Center, the requirement waiver listed below is requested for the subject directive with consideration of proposed mitigating actions.

Identification of Requirement:

NPR 1400.1D NASA Directives Procedural Requirements, with Change 5
(11/19/2009)

3.5.2.6 The Center Directives Manager shall automatically remove CPDs and CPRs from the Center Directives Library upon expiration, unless 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.

Proposed Waiver to Requirement:

We are respectfully requesting relief from this requirement of automatically pulling directives if the following mitigation steps are taken and documented (on a case by case basis):

- The Directive has been reviewed prior to the Expiration Date and any required changes are identified and documented.
- The Director for the Office of Primary Responsibility for that Directive has assessed risk to any delay in posting necessary changes to the document vs the risk in having the existing document not available for use by Center employees.

- A memo is distributed From the Director of the Office of Primary Responsibility to the Center Directives Manager:
 - authorizing continued use of the existing document
 - describing the nature of changes required
 - the results of the risk assessment and justification for delay
 - a firm date for which they (as a member of the Center's Senior Leadership) commit to have the updated Directive submitted for processing.

Justification to Waive the Requirement:

Center level Directives are reviewed as required in 5-year intervals. However in some cases, limited subject matter expertise, day to day work demands and the amount of time needed to update a directive may prevent the document from having all required edits completed and submitted for processing to ensure review, approval and posting prior to established expiration date.

In all cases, the risk and nature of required changes is considered in prioritizing updating of directives, however in limited instances, updates may still not be able to be ready for submission prior to the expiration date. Current NPR 1400.1 D requirements mandate that without consideration of risk to safety, mission or center operations, if any Directive reaches its' expiration date the Directives Manager must remove it from access to Center employees. This has potential for creation of unintended consequences.


We anticipate that these cases will be the exception rather than the norm, but would like to have concurrence on an approach that will keep critical Directive information available to our employees, while striving meet the intent NPR 1400.1 to ensure that all such documents are regularly reviewed and kept current. Your consideration would be most appreciated.

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 Directorate

7 March 2011
 Date

Concurrence:



Woodrow Whitlow
Associate Administrator Mission Support Directorate

7 March 2011
Date

cc:

106/Director

165/A. E. Motley

218/K. C. Suddreth

NASA--LP03/L. P. Becker

218/KCSuddreth:mjm 2/8/11 (46093)