

Request Relief from Requirements in NASA Directives

NRW -1400 -98

Johnson Space Center

Requesting Responsible Office/Center:

Identification of Requirement

Directive ID, Requirement Paragraph Number, and Description:

NPR 1400.1H NASA Directives and Charters Procedural Requirements, Paragraph 3.7.c (2) Chapters separated by page breaks, describe the directive's requirements and responsibilities that are subdivided into paragraphs that are numbered using Figure 3-4

Scope (e.g., site, facility, operation, and/or activity) and duration of the request:

Duration Request - Permanent Waiver  
Existing waiver NRW 1400-93 expires 2/15/2020

Justification:

Describe the purpose/rationale for this request:

NPR 1400.1 requires sequential chapter numbers as part of the paragraph numbers. Currently, the chapters of JPR 1700.1 are grouped into "Parts" based on common themes. JPR 1700.1 JSC Safety and Health Requirements is an applicable document in 145 JSC contracts. JPR 1700.1 was created over 20 years ago, existing paragraphs are compliant per NPR 1400.1, paragraph 3.7.3h. JPR 1700.1 currently aligns with VPP Recertification (Parts 1-4) and OSHA requirements addressing specific hazards (Parts 5-11)

Describe if application of the requirement conflicts with other requirements. If not, check here

Describe if the application of the requirement would not achieve, or is not necessary to achieve the underlining purpose of the requirement.

Paragraph 3.7.c (2) application to JPR 1700.1 developed over 20 years ago not necessary to achieve the underlining purpose of the requirement. The JPR 1700.1 aligns with VPP Recertification documentation and OSHA specific hazards documentation. See enclosure 2 for rationale.

Describe the cost or schedule considerations related to the request. If none, check here

Avoids costs involved in rework and revisions to documents across the Center.

Describe the risks that will be incurred if the request is granted. If none, check here

Relief from Environment, Safety, Health, Security Requirements

Describe special circumstances that warrant granting the request.

N/A

Describe the actions that will be taken to ensure adequate safety and health and protection of the public, the workers, and the environment.

N/A

Signatures

Requesting Office's Official-in-Charge, or designee:

Name: Donna M. Shaker

Signature: Donna M Shaker

Date: 2-13-2020

Approving Office's Official-in-Charge, or designee

Name: Joel Carney

Signature: Joel Carney

Approved 02/19/2020

Denied

Justification for Denial, if applicable.

NPR 1400.1H, paragraph 3.7.2.c (2), as implemented by the mandatory JPR template, JSC Form 2420B, requires chapters to be numbered sequentially. Currently, the chapters of JPR 1700.1 are grouped into "Parts" based on common themes. Chapters are currently numbered by part and chapter (1.1, 1.2, etc).

Relief from this requirement is justified as follows:

1. JPR 1700.1 is a seven hundred page document. It has 87 chapters covering various safety and health subjects. It has been organized into "Parts" for over 20 years. Part 11 was previously a JSC handbook on asbestos work that was incorporated into JPR 1700.1. It needs to be a stand-alone unit. Users have become accustomed to the organization, and changing it would cause confusion.
2. This relief request does not conflict with any other requirements.
3. The intent of JPR 1700.1 is to provide JSC with safety and health requirements in a user-friendly manner and ensure a safe and healthful workplace. Changing to sequentially numbered chapters would make this large, complex document less user-friendly and could cause users to miss important safety or health requirements. This is consistent with NPR 1400.1, paragraph 1.1.4.d, "...to ensure that NASA directives: d. Are available and easily accessible or retrievable by all affected or interested parties."
4. JPR 1700.1 revision L complies of requirements found in template, JSC Form 2420B, with the exception of the Parts structure.
5. JPR 1700.1 has become deeply entrenched in the JSC safety and health culture. Many user procedures refer to chapters in 1700.1 and changing them will cause a significant amount of rework across the Center.
6. No additional risk is involved in granting relief from this requirement.

National Aeronautics and  
Space Administration

**Lyndon B. Johnson Space Center**  
2101 NASA Parkway  
Houston, Texas 77058-3696



February 13, 2020

Reply to Attn of: NS-20-012

**TO:** NASA Headquarters  
Attn: Deputy Associate Administrator, Mission Support Directorate

**FROM:** NA/Director

**SUBJECT:** Request Requirements Relief for JSC Procedural Requirements (JPR) 1700.1,  
JSC Safety and Health Requirements

The Safety and Mission Assurance Directorate requests formal relief from the following requirements of NASA Procedural Requirement (NPR) 1400.1:

Paragraph 3.7 requires sequential chapter numbers with the chapter number as part of the paragraph number. Currently, the chapters of JPR 1700.1 are grouped into "Parts" based on common themes. Chapters are currently numbered by part and chapter (1.1, 1.2, etc). Furthermore, paragraphs are numbered per NPR 1400.1, paragraph 3.7.2.c (2). The NASA Requirements Relief form is in Enclosure 1. The rationale and justification for this request is found in Enclosure 2.

This relief request for a permanent waiver covers JPR 1700.1 at JSC, Revision L, effective 2018 until no longer required for use at JSC.

Thank you for your consideration of this request. If you have any questions concerning this memorandum, please contact Dan Clem by e-mail at [daniel.l.clem@nasa.gov](mailto:daniel.l.clem@nasa.gov) or by phone at 281-483-4272.

  
William R. DeLoach

Enclosures

cc:  
See List

**cc:**

AA/V. E. Wyche

AA/D. M. Shafer

NA/R. J. Walheim

NA/D. T. Loyd

NA/C. L. Ross

NA/K. E. Stanton

NS/S. A. Menard

NS/L. Williams-Hudson

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NS2/D. L. Clem

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XB/C. L. Claunch

XB/L. K. Turnbough

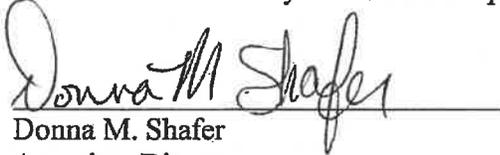
HQ/LA000/N. J. Smith

**Johnson Space Center  
Decision Package for Waiver Request to  
NPR 1400.1 NASA Directives and Charters Procedural Requirement**

*JSC request a permanent waiver to subject NPR.*

*JSC submits the following Cost/Benefit Impact comments:*

JPR 1700.1 JSC Safety and Health Requirements Rev. L Chg. 1 Cost/Benefit Impacts: None.



Donna M. Shafer  
Associate Director

CODE	NA/WRD	NA/RJW	AA/VEW			
CONCUR						
DATE						