

National Aeronautics and
Space Administration

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



July 1, 2013

NRW 1400-60

Reply to Attn of: NS-13-011

TO: NASA Headquarters
Attn: Director for Internal Controls and Management Systems

FROM: AA/Director

SUBJECT: Request for a Requirements Waiver for JSC Procedural Requirement (JPR)
1700.1, JSC Safety and Health Handbook

The Safety and Mission Assurance Directorate is requesting a formal waiver from the following requirements of NASA Procedural Requirement 1400.1:

1. Paragraph 3.7 requires sequential chapter numbers with the chapter number as part of the paragraph number. The chapters of JPR 1700.1 are grouped into "Parts" based on common themes with sequentially numbered chapters (1.1., 1.2., etc). Paragraphs are numbered per NPR 1400.1, paragraph 3.7.h. The rationale and justification for this is in Enclosure 1.
2. Paragraph 4.3.10 states, "When signed, a directive becomes an official NASA directive and shall be controlled in an electronic documentation library. Agency-level directives are controlled in NODIS. Center-level directives are controlled in electronic libraries established at each Center and are linked to NODIS." JPR 1700.1 does not currently reside on the JSC Center Directives Management System directives library. The rationale and justification for this is in Enclosure 2.

This waiver request covers JPR 1700.1 at JSC, effective until JPR 1700.1, Revision K expires or is completely revised.

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 or by phone at 281-483-4272.

Ellen Ochoa

Ellen Ochoa

2 Enclosures

cc: See List

Approved: 

Nancy Anne Baugher

NPR 1400.1, paragraph 3.7, requires chapters to be numbered sequentially. Currently, the chapters of JRP 1700.1 are grouped into "Parts" based on common themes. Chapters are currently numbered by part and chapter (1.1, 1.2, etc).

This waiver is justified as follows:

1. JPR 1700.1 is a large, complex document of 88 chapters covering different subjects. It is organized into "parts." Part 12 was previously a JSC handbook on asbestos work that was incorporated into JPR 1700.1. It needs to be a stand-alone unit. This makes the large, complex document more user-friendly. Users have become accustomed to the organization and changing it would cause confusion. Sequentially-numbered chapters are good for small documents but do not always work well for large, complex documents such as JPR 1700.1. JPR 1700.1 otherwise meets the paragraph numbers of NPR1400.1.
2. This waiver does not conflict with any other requirements.
3. The intent of JPR 1700.1 is to provide JSC with safety, health, and environmental 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 1.1.2.d: "...to ensure that NASA directives: d. Are available and easily accessible or retrievable by all affected or interested parties."
4. 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.
5. No additional risk is involved in waiving this requirement.

JPR 1700.1 currently exists on the JSC Safety and Health Web Page (<http://jschandbook.jsc.nasa.gov/>) and is linked to the JSC Center Directives Management System directives library. This is a "green site" since it needs to be accessible to potential offerors on JSC contracts. All contractors are required to follow JPR 1700.1. This has been cleared through export control. Due to its size of 88 chapters, plus appendices, a web-based version was created in an easy-to-navigate format, allowing users to select individual chapters with one click. A PDF version of the entire document is also available on the Web site. The Safety and Mission Assurance Directorate maintains configuration control of the document. Changes are documented on a change sheet. Requirements changes are reviewed and approved per NPR 1400.1 and JPR 1410.2.

This waiver is justified as follows:

1. JPR 1700.1 is cited in every request for proposal (RFP) that JSC issues. All JSC contracts are required to follow JPR 1700.1. Meeting the requirements in JPR 1700.1 affects the cost of the contract, so it is essential that offerors have access to this document when preparing proposals. It is also widely used at JSC since it prescribes requirements for safe practice and equipment. The size of the directive makes a Web-based, easy-to-navigate format essential to allow users to find the requirements they need with minimal impact to productivity.
2. Providing a user-friendly, easy-to-navigate format for the JSC community and providing access to potential offerors is consistent with NPR 1400.1, paragraph 1.1.2.d: "...to ensure that NASA directives: d. Are available and easily accessible or retrievable by all affected or interested parties."
3. The intent of the NPR 1400.1, paragraph 4.3.10 requirement is to ensure that configuration control is maintained in a central library. JSC's central, electronic directives library has a link to the JPR 1700.1 Web Page. The Safety and Mission Assurance Directorate maintains tight configuration control on the document in conjunction with the Center Directives Manager. The present format of JPR 1700.1 meets the intent of having the document on a central, controlled library.
4. The current format of JPR 1700.1 was developed after user requests for an easy-to-navigate format. The "green site" was implemented at the request of JSC Procurement. JSC Procurement had intended to post its own copy on a "green site," but this poses configuration control problems. Having the master copy on a "green site" allows both access to offerors and configuration control. Having safety and health requirements readily available is also important for injury prevention and preserving NASA's safety culture.
5. No additional risks are identified as a result of this waiver.