

NASA AEROSPACE SAFETY ADVISORY PANEL
National Aeronautics and Space Administration
Washington, DC 20546
VADM Joseph W. Dyer USN, (Ret.), Chair

May 26, 2010

Mr. Charles F. Bolden, Jr.
Administrator
National Aeronautics and Space Administration
Washington, DC 20546

Dear Mr. Bolden:

The Aerospace Safety Advisory Panel (ASAP) reviewed NASA's responses dated April 6, 2010 to six of the ASAP's 2009 recommendations, and has stasured all recommendations as closed.

The NASA response to two of the recommendations, 2009-01-01b, Human Rating Requirements and Engineering Standards, and 2009-01-04, Safety, Reliability and Mission Assurance Technical Fellows, was very positive allowing the ASAP to close these recommendations without reservation.

The ASAP closed Recommendations 2009-01-03a, Risk Management Models and Risk Acceptance; 2009-01-03b, Risk Management Models and Risk Definitions; and 2009-04-02, Center Wide-OSHA Compliance Surveys, however comments are provided.

Recommendation, 2009-02-02, Communicating Change, has been closed, having been replaced by a new Recommendation 2010-02-04, Public Affairs Office Role, from our April 30, 2010 Quarterly meeting at Headquarters, which encourages this office take a more aggressive role in the future to implement what it says are needed initiatives. Comments for the recommendations are provided in the Enclosure, with specific agenda topics and discussion suggested for future meetings.

Sincerely,



Joseph W. Dyer, VADM, USN (Ret.)
Chair
Aerospace Safety Advisory Panel

Enclosure

ASAP Review of NASA responses dated April 6, 2010

1. Recommendation 2009-01-01b, Human Rating Requirements and Engineering Standards: The NASA response dated April 6, 2010 to this recommendation is acceptable and the ASAP has statused this recommendation as Closed.
2. Recommendation 2009-01-03a, Risk Management Models and Risk Acceptance: The ASAP has statused this recommendation as Closed based on the NASA response dated April 6, 2010 to this recommendation, but has comments relating to the notable absence of (1) a standard risk matrix in the NPR 8000.4A and (2) a requirement to perform an risk assessment of the aggregate risk posed by all of the contributing risks. As the ASAP understands it, the NASA approach in the NPR 8000.4A for describing the level of risk to be accepted by each level of management relies on the managers to decide the predetermined risk thresholds as each level negotiates with the next lower level to define the envelope that a manager must work within in accepting risk or elevating it up for acceptance. Consistency to assure that the authority for risk acceptance is appropriate has each level oversee the risk management process at the next lower level and by having the Technical Authorities, and in particular the Safety Authority, serve as a check to ensure that risk is being accepted at the proper risk acceptance level. What concerns the ASAP is that when one implements this loosely bound approach where one relies on negotiation between various people, the risk model for each program could be entirely different from one program to another and without a clear understanding of the level of risk that needs to be reported at the Agency-level. The ASAP believes that far greater consistency can be achieved by having a standard risk matrix in which predetermined risk thresholds are baselined for each management level within the Agency. Tailoring of the standard matrix would still be permitted provided that rationale exists and is approved for deviating from the baseline. A formal process would be required to review the rationale and approve and document the deviation. The ASAP believes that the end result would be greater standardization in the risks accepted at the various levels of management.

Although the NASA response references the integrated hazards as being those that affect multiple systems or elements and cites the Constellation policy in this regard, it is not apparent that there is a NASA requirement to address the aggregate risks associated with programs and projects.

3. Recommendation 2009-01-03b, Risk Management Models and Risk Definitions: The ASAP accepts the NASA decision to not conduct the risk categorization “test” as recommended in the ASAP recommendation, however we will continue to promote standardization whenever we see the opportunity for obtaining greater efficiency and effectiveness in the NASA Safety program.
4. Recommendation 2009-01-04, Safety, Reliability, and Mission Assurance Technical Fellows: The NASA response dated April 6, 2010 to this recommendation is acceptable and the ASAP has statused this recommendation as Closed.
5. Recommendation 2009-02-02, Communicating Change: In the NASA response dated April 6, 2010, NASA acknowledges the difficulty it has in controlling

communications with the media. The challenges in the area of communications during 2010 are enormous as NASA pursues the initial planning required to implement a major redirection of its mission and enormous changes in response to new initiatives in the FY2011 White House budget request while at the same time continuing on its present course with Constellation – all the while striving to keep the public informed. Because the ASAP has evidence of continuing miscommunication related to safety issues and involving, for example, the human rating of commercial vehicles, we addressed the transparency and communication issues that we have broached with Ms. Beth Dickey, Public Affairs Officer, and Mr. Robert Jacobs, Acting Associate Administrator for the Office of Communications, at our Quarterly meeting at Headquarters on April 30, 2010. Based on our discussions, the ASAP found that the public affairs operation can be improved. The Acting Associate Administrator offers good advice to NASA's Program Offices, i.e., tell your own bad news; bad news does not get better with age; and shining light on things is good. The Office has identified several communications issues and highlighted some solutions—all are possible. As a result, the ASAP formulated a new recommendation 2010-02-04, Public Affairs Office Role, that states "PAO follow the advice that they give to NASA's Program Offices. The PAO needs to become more integrated with the technical people. It should aggressively pursue the solutions to the issues that have been identified. The ASAP encourages PAO to take more direct control of their work and to play a bigger role than just the messenger." This new recommendation will replace our earlier recommendation; therefore recommendation 2009-02-02 is closed.

6. Recommendation 2009-04-02, Center-Wide-OSHA Compliance Surveys: The NASA response dated April 6, 2010 to this recommendation indicates that the policy that NASA has put in place is acceptable. The ASAP has stautused this recommendation as Closed, but will pursue an initiative to include OSHA audit results as an agenda topic in our review of Center Safety programs.