TO: A/Administrator
FROM: W/Inspector General

SUBJECT: Comments on Proposed Options for NASA’s Implementation of Columbia Accident Investigation Board Recommendations 7.5-1 and 7.5-2

The Office of Inspector General has been reviewing NASA’s progress in responding to Columbia Accident Investigation Board (CAIB) recommendations 7.5-1 and 7.5-2 concerning independent engineering and safety organizations at NASA. We have benefited from the full cooperation of NASA management in this regard.

NASA appears headed toward making its Centers responsible for fulfilling independent engineering and safety responsibilities, with policy direction and oversight coming from Headquarters. While it may be that such organizations could be designed to fulfill the CAIB’s intent that NASA have robust and independent engineering and safety offices in connection with space flight operations, we believe the decentralized approach being contemplated is inconsistent with the language of the CAIB report.

The Independent Technical Engineering Authority (ITEA) is discussed in the CAIB’s recommendation in the singular. The CAIB thought of the ITEA as a single integrated authority, rather than separate organizations reporting to Center Directors. Further, the recommendation concerning the safety organization specifically calls for direct line authority to the Associate Administrator for Safety and Mission Assurance. The matrix design being contemplated does not establish this.

The CAIB did not prescribe the design of the two organizations that would fulfill its recommendation. But, in our view, the recommendations are worded to ensure that the engineering authority and safety organization would be independent of the cost and schedule pressures of the Shuttle program and CAIB-identified “unofficial hierarchies” that have hindered the flow of communications. To us, adapting the independent engineering and safety organizations into NASA’s decentralized (center-oriented) and matrixed structure would not create a system of checks and balances able to withstand the test of time.

Lastly, if NASA intends to deviate from the express language of the CAIB report, it should state openly and clearly its reasons for doing so, including why implementation of particular CAIB recommendation language would be detrimental to the best interests of the Agency.

Robert W. Cobb
Inspector General
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