



## Work Instruction (WI)

**DIRECTIVE NO.** 350-WI-1700.1.1A  
**EFFECTIVE DATE:** October 30, 2013  
**EXPIRATION DATE:** October 30, 2018

**APPROVED BY Signature:** Original Signed By  
**NAME:** Patrick A. Hancock  
**TITLE:** Chief, Occupational Safety & Health Division

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### COMPLIANCE IS MANDATORY

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**Responsible Office:** 350/Occupational Safety and Health (OS&H) Division

**Title:** Occupational Safety Assessment Team Audit Program

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## PREFACE

### P.1 PURPOSE

Regular workplace inspections are a critical step in an Integrated Safety Management Program. Annual and periodic safety surveys assist the National Aeronautical Space Administration (NASA) Goddard Space Flight Center (GSFC) achieve compliance with regulations, codes, and directives. The purpose of this work instruction (WI) is to establish guidelines, procedures, and technical criteria for safety and health facility and construction inspections.

### P.2 APPLICABILITY

This directive applies to Code 350, the Occupational Safety and Health (OS&H) Division, and to the OS&H Support Services Contractor, hereinafter referred to as the Safety Support Contractor.

### P.3 REFERENCES

- a. 29 CFR 1910, Occupational Safety and Health Standard
- b. 29 CFR 1960.25, Qualifications of safety and health inspectors and agency inspections
- c. 29 CFR 1960.26, Basic Program Elements for Federal Employee Occupational Safety and Health Administration – Conduct of Inspections
- d. National Fire Protection Associations (NFPA) Codes
- e. International Building Code
- f. NPR 8715.1, NASA Occupational Safety and Health Programs
- g. GPR 1700.1, Occupational Safety Program at Goddard Space Flight Center
- h. NASA OS&H Hazard Abatement Form (NF 1584)

### P.4 CANCELLATION

350-WI-1700.1.1

### P.5 TOOLS, EQUIPMENT, AND MATERIALS

None

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## P.6 SAFETY PRECAUTIONS AND WARNINGS

Proper Personal Protective Equipment (PPE) shall be worn as deemed necessary by the organization or contractor that has control of the location being visited.

## P.7 TRAINING

None

## P.8 RECORDS

Record Title	Record Custodian	Retention
Hazard Analysis Tracking Index	Occupational Safety	*8/103 Destroy/delete between 5 and 30 years after program/project termination.
Hazard Abatement Plan	Occupational Safety	*NRRS 8/40.5 Retire to FRC 5 years after date of abatement/resolution. Destroy 10 years after abatement/resolution.

\* NRRS – NASA Records Retention Schedule ([NPR 1441.1](#))

## P.9 MEASUREMENT/VERIFICATION

The Safety Support Contractor shall manage data in order to provide a variety of reports and metrics on requested safety program indicators, status reports by Director and Division, aggregated findings by type and correlation, and similar reports or metrics.

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## Instructions

In this document, a requirement is identified by “shall,” a good practice by “should,” permission by “may” or “can,” expectation by “will,” and descriptive material by “is.”

GSFC currently has over 150 structures, including 34 major buildings. Facilities include laboratories, offices, test facilities, a plating shop, warehouse and storage facilities, a central power plant, above-ground storage tanks, hazardous waste storage sites, radiation source generators, data processing facilities, employee services facilities, and a visitor’s center.

OS&H Division has primary responsibility for the facility inspection process.

### 1.0 Annual Facility Inspections

#### 1.1 Inspection Criteria

Facility inspections are intended to be walkthroughs to visually inspect the workplace. Though not intended to be a programmatic review, the inspection findings provide a valuable indication of program effectiveness. The Occupational Safety Inspection Team shall assess each facility for compliance with the following primary criteria:

- a. Code of Federal Regulations (CFR) (29 CFR 1910; 29 CFR 1960.26)
- b. NFPA Codes
- c. NASA Standards and Procedures
- d. GSFC Standards and Procedures

In addition, there are other plans and permits that apply to GSFC at selected operations. For oversight purposes, the inspection team shall be familiar with the following secondary criteria:

- Other new, pertinent GSFC directives in the 1700, 1800, and 8870 series as published.

For the purpose of this work instruction, a facility is defined as the interior core of the structure, the exterior perimeter of the structure, and any accompanying structures (e.g., trailers) associated with that facility’s structure.

Annual facility inspection findings will be assigned as follows:

- Facility related findings – Appropriate Building Manager
- Non-facility related findings – Organizational representative that is responsible for the space where the finding is identified

#### 1.2 Inspection Coordination

The Occupational Safety Inspection Team consists of the following:

- a. The Occupational Safety & Health Support Contractor’s Inspection Team

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1. The OS&H contractor inspection team representative, who serves as inspection team leader
  2. Other Occupational Safety & Health Division representatives as needed.
- b. Building & Organization representatives
1. The Facility Operations Manager (FOM) or his/her designee; and
  2. The Facilities Management Division (FMD) Building Manager.
  3. Organizational Representatives as needed

The inspection team will be formed as appropriate for each facility, based on the operations within and related compliance issues.

The inspection team leader will schedule the inspection, form the facility inspection team, coordinate the schedule with the team members, and keep the OS&H Division informed of the schedule and team members. The inspection team leader will contact the FOM and Building Manager before the scheduled inspection date for confirmation. The FOM and Building Manager or the designee facilitates the inspection process, answers questions, and serves as the facility guide.

## **2.0 ROUTINE INSPECTION PROCEDURE**

### **2.1 Preparation Activities**

Before an inspection, the Safety Support Contractor shall complete the following:

- a. At least one month prior to scheduled audit, send out invitation(s).
- b. Schedule, prepare and conduct In-Brief. *(If a combined assessment, then the NASA representative will take the lead.)*
  1. In-Brief should contain items listed in 2.1.c and clearly define the scope of the activities to be performed.
- c. Distribute the following: *(If a combined assessment, then the NASA representative will take the lead.)*
  1. Previous facility inspection report(s), and trend analysis
  2. In-Brief Presentation. *(If a combined assessment, then the NASA representative will take the lead.)*
  3. Copy of outstanding open findings.

### **2.2 Initial (Annual) Inspection**

The facility inspection will generally proceed in the following order but is at the discretion of the inspection team leader:

- a. Discuss the inspection with the FOM and Building Manager or designee (in-brief).
- b. Review the submitted materials with FOM and Building Manager.
- c. Inspect the facility
- d. Question occupants as needed to clarify areas of concern.
- e. Inspect the grounds outside the facility and the associated structures.

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- f. Verify open or in progress findings.
- g. Review the inspection findings with the FOM or designee and the Building Manager (out-brief).
- h. Prepare and distribute report.

Inspections will be conducted in accordance with 29 CFR 1960.26.

### **2.3 Imminent Danger**

In the event an imminent danger, Risk Assessment Code (RAC) 1 is identified work will be stopped immediately in accordance with Figure 2.3. See Appendix C for a list of items that are RAC 1 items.

The supervisor in charge of the establishment, or a person empowered to act for that official, shall undertake immediate abatement or cease operations and remove exposed personnel who are not necessary for abating an imminent danger condition. If the supervisor needs assistance to undertake full abatement, that official shall promptly contact the responsible Center officials, who shall assist in the abatement effort.

If deemed necessary by OS&H Division:

- a. Employees shall be removed from exposure to the alleged imminent danger condition until it has been abated;
- b. A method of visual notification will be posted in the immediate vicinity of the hazard to prevent employees from unknowingly exposing themselves to the hazard.

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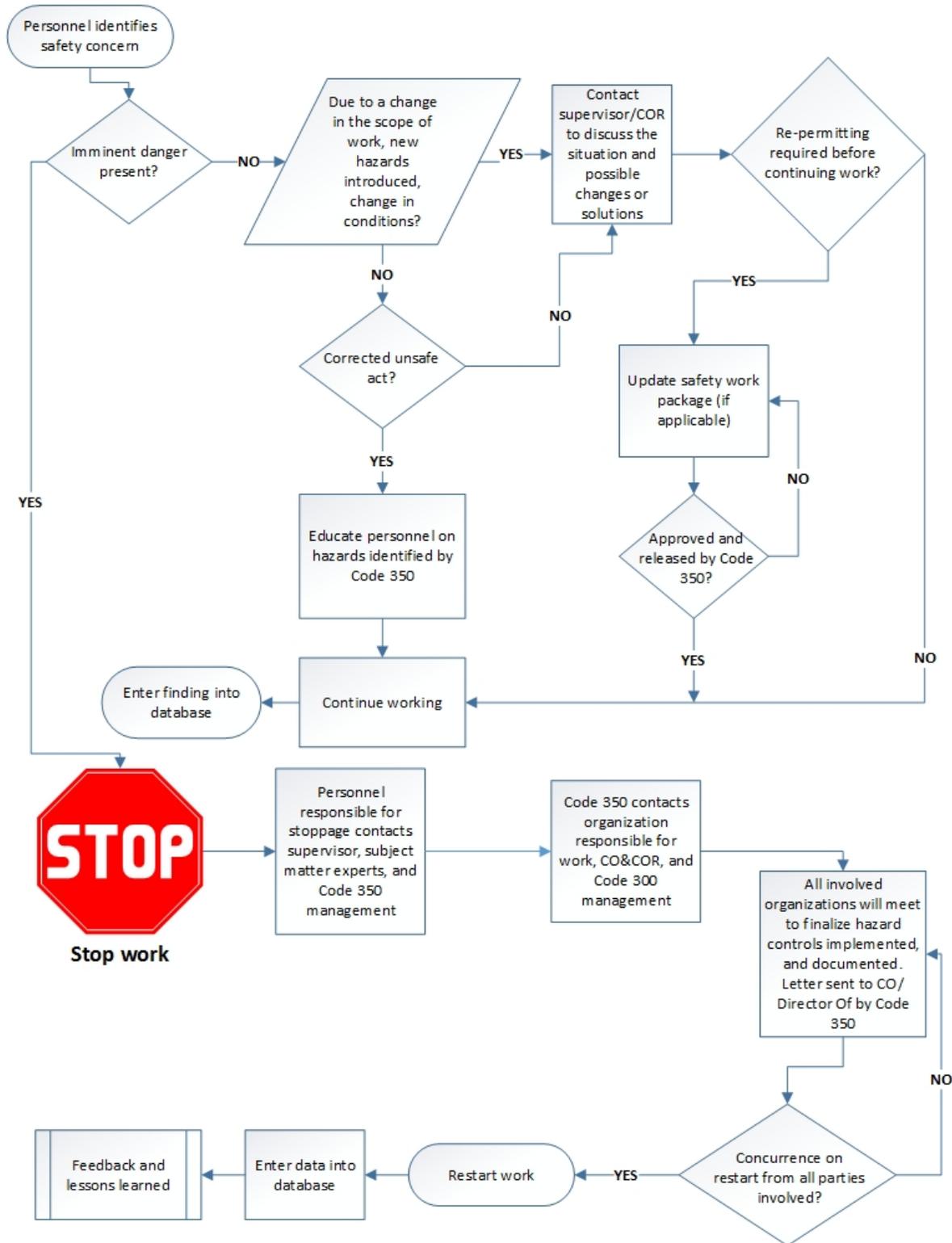


Figure 2.3 Stop Work Process

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## 2.4 Annual Inspection Report

The annual inspection report shall follow the process in the Facility Inspection Protocol unless there are no discrepancies. If there are no discrepancies, the annual inspection report will be prepared and noted in the section where deficiencies are identified, “No Findings Identified.”

The annual inspection report shall be delivered within 10 working days of the inspection completion. If the report cannot be issued within the prescribed time period, reasons for the delay must be documented and sent to the Contracting Officer’s Representative (COR).

The FOM shall send the report to all building occupants and post the report for public observation until all hazards are abated or for 3 working days, whichever is later. The hazard will be posted if deemed necessary by the OS&H Division.

## 2.5 Code Representative Response

To ensure timely and effective corrective actions, the Code Representative shall submit a response in Safety Health and Environmental Tracking (SHEtrak) Database regarding the status of each item, assigned to their code, within 30 calendar days of finding notification. The response letter must include Work Request numbers and/or Procurement numbers where applicable.

In accordance with NPR 8715.1, the responsible supervisor must promptly prepare a Hazardous Abatement Plan (HAP) with the appropriate consultation with the OS&H Division where conditions will require more than 30 calendar days to abate. Abatement plans shall be completed and submitted for approval in the SHEtrak system. The plan shall contain an explanation of the circumstances of the delay in abatement, a proposed timetable for the abatement, and a summary of steps being taken in the interim to protect employees from being adversely exposed to the unsafe or unhealthful working condition. Any changes in the HAP will require SHEtrak to be updated by preparing a new plan in accordance with the provisions of this paragraph.

When a hazard cannot be abated with the authority and resources of the supervisor in charge of the establishment, that official shall request assistance from the responsible organization’s management, the OS&H Division, any established committee and/or employee representatives, and all personnel subject to the hazard shall be advised of this action and of interim protective measures in effect and shall be kept informed of subsequent progress on the abatement plan.

Periodic progress reports are required for all HAPs. Failure to comply with hazard abatement responsibilities may result in the issue being raised to the Director of the appropriate GSFC Directorate.

If after 30 calendar days no update has been provided for a finding, the finding elevation process defined in Figure 2.5 will be followed.

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**Figure 2.5 Finding Elevation Process**

## 2.6 Follow-up Inspection

The OS&H Division shall conduct follow-up inspection within 90 days of the date of notification of 10% of the recorded discrepancies to validate the abatement of hazards. The follow-up inspection follows the same procedure as the initial inspection, but addresses only the discrepancies discovered during the initial (annual) inspection. The OS&H inspector has the ability to invite or not invite attendees as he/she deems appropriate. If items that are listed as open are found to be closed during the follow-up inspection the person responsible for the finding will be notified to update the SHetrak system.

## 2.7 Construction Inspections

Construction inspections will be performed periodically for the various types of construction activities that take place across the Greenbelt campus. Upon arrival at a construction site the Occupational Safety Inspection Team shall check-in with the site supervisor or other responsible party, if practical.

The inspector shall wear the appropriate PPE as defined by the established requirements of the construction site and conditions present at the time of the inspection.

Where a construction site inspection results in the identification of a violation, the SHetrak system will be used to track any findings to closure. Inspectors should reference the SHetrak Inspectors User Guide for directions on the use of the SHetrak system.

Inspectors should review previous findings for a construction project and if a repeat finding is identified training records may be requested through SHetrak. Construction findings in SHetrak will be assigned to the construction project COR for closure.

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## 2.8 Spot Inspections

Spot inspections include all safety inspections that are conducted with the exception of safety annual inspections and construction inspections, such as responding to an employee request to evaluate a situation or space. Inspectors should reference the SHEtrak Inspectors User Guide for directions on the use of the SHEtrak system.

Spot inspection findings will be assigned as follows:

- Facility related findings – Appropriate Building Manager
- Non-facility related findings – Organizational representative that is responsible for the space where the finding is identified

## 3.0 FINDINGS RANKING PROCESS

### 3.1 Risk Management Process

The method used for hazard management at GSFC consists of a series of analytical steps shown in Figure 1 (Hazard Resolution Process) and summarized below:

- a. Define the physical and functional characteristics of the system, using the information available, and relate the interaction between people, procedures, equipment, and the environment.
- b. Identify hazards related to all aspects of the operation. Document the hazards in a Hazard Analysis.
- c. Assess the hazards to determine severity and probability and to recommend methods for their elimination or control.
- d. Implement corrective measures to eliminate or control the hazard, or accept the hazard.
- e. Conduct follow-up analyses to determine the effectiveness of preventive measures, address new or unexpected hazards, and issue additional recommendations if necessary.

NOTE: The risk management process does not allow responsible parties to opt out of meeting minimum regulatory requirements.

The Risk Assessment Code (RAC) is a numerical expression of comparative risk determined by an evaluation of both the potential severity of a condition and the probability of its occurrence. RACs are assigned a number from 1 to 7 in a risk matrix (see Table 3.4.1). The RAC number will serve as a means to prioritize corrective actions, e.g., RAC 1 is unacceptable and mitigation actions must be taken immediately or operations terminated, RAC 2's must be addressed before RAC 3's etc.

Additionally, the RAC is a number derived by considering both the severity and the probability of a hazard, as shown in Table 3.4.1. The RAC presents hazard analysis data in a format that helps those managing the activity make decisions regarding whether hazards should be eliminated, controlled, or accepted. This process provides the basis for logical management decision making, considering both the severity and probability of a hazard.

## **HAZARD MANAGEMENT PROCESS**

### **DEFINE THE SYSTEM**

DEFINE THE PHYSICAL AND FUNCTIONAL CHARACTERISTICS AND UNDERSTAND AND EVALUATE THE PEOPLE, PROCEDURES, FACILITIES, EQUIPMENT, AND ENVIRONMENT



### **IDENTIFY THE HAZARDS**

IDENTIFY HAZARDS AND UNDESIRED EVENTS  
DETERMINE THE CAUSES OF THE HAZARDS



### **ASSESS HAZARDS**

DETERMINE SEVERITY  
DETERMINE PROBABILITY  
DECIDE TO ACCEPT RISK OR ELIMINATE/CONTROL



### **RESOLVE HAZARDS**

ASSUME RISK OR IMPLEMENT CORRECTIVE ACTION  
ELIMINATE/CONTROL



### **FOLLOW-UP**

MONITOR FOR EFFECTIVENESS  
MONITOR FOR UNEXPECTED HAZARDS

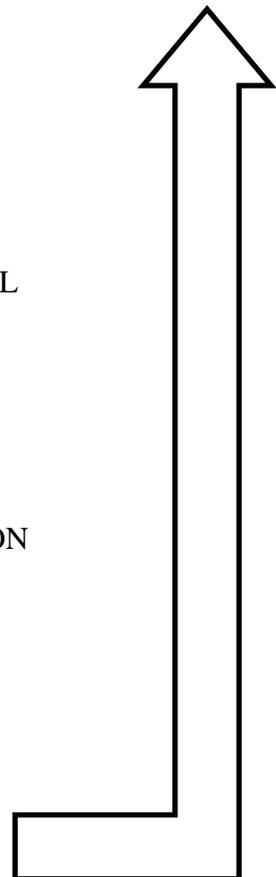


Figure 3.1. Hazard Resolution Process

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### 3.2 Hazard Severity Categories

Severity is an assessment of the worst potential consequence, defined by degree of injury or property damage, which could occur. The severity classifications are defined in Table 3.2.

#### HAZARD SEVERITY CATEGORIES

Category	Hazard Category	Potential Consequences
<b>I</b>	<b>CATASTROPHIC</b>	A condition that may cause death or major system or facility destruction on the ground, or loss of crew or vehicle during the mission.
<b>II</b>	<b>CRITICAL</b>	A condition that may cause permanent disability, severe injury or occupational illness, or major property damage.
<b>III</b>	<b>MODERATE</b>	A condition that may cause minor injury or occupational illness, or property damage.
<b>IV</b>	<b>NEGLIGIBLE</b>	A condition that should not affect personnel safety or health, but is a violation of specific criteria.

Table 3.2: Hazard Severity Categories

### 3.3 Hazard Probability Categories

Probability is the likelihood that the event will result with the predefined severity. Probability levels are defined in Table 3.3.

#### HAZARD PROBABILITY CATEGORIES

<b>LEVEL</b>	<b>FREQUENCY OF OCCURRENCE</b>	<b>DEFINITION</b>
<b>A</b>	Frequent	Likely to occur frequently.
<b>B</b>	Probable	Will occur several times in the life of an item.
<b>C</b>	Occasional	Likely to occur sometime in the life of an item.
<b>D</b>	Remote	Unlikely, but possible to occur in the life of an item.
<b>E</b>	Improbable	So unlikely, it can be assumed occurrence may not be experienced.

Table 3.3: Hazard Probability Categories

**3.4 Risk Assessment Code (RAC)**

Table 3.4.1 defines the overall RAC assigned to the hazard based on the hazard severity and probability.

**RISK ASSESSMENT CODE MATRIX**

Frequency of Occurrence	Hazard Categories			
	I Catastrophic	II Critical	III Moderate	IV Negligible
(A) Frequent	1	1	2	3
(B) Probable	1	2	3	4
(C) Occasional	2	3	4	5
(D) Remote	3	4	5	6
(E) Improbable	4	5	6	7

Severity Probability (SP)	<b>RAC</b>	<b>Suggested Criteria</b>
IA, IB, IIA	 1	<b>Unacceptable</b> (Hazard must be resolved immediately)
IC, IIB, IIIA	 2	<b>Unacceptable</b> (Notify all personnel and resolution should be high priority)
ID, IIC, IIIB, IVA	 3	<b>Undesirable</b> (Hazard is unacceptable and must be resolved)
IE, IID, IIIC, IVB	 4	<b>Undesirable</b> (Reduce hazard or accept with management review)
IIE, IIID, IVC	 5	<b>Reasonable</b> (Hazard should be apparent to personnel and reduced if possible)
IIIE, IVD	 6	<b>Acceptable</b> with personnel notification
IVE	 7	<b>Acceptable</b> without action

Table 3.4.1: Risk Assessment Code Matrix

### 3.5 Health & Safety Inspection Response Periods

RAC #	Hazard Classification	H&S Response Time*
1	Imminent Danger	Within 24 Hours
2	Serious Danger	Within 3 working Days
3	Potentially Serious Danger	Within 30 working Days
4	Potentially Moderate Danger	Within 30 working Days
5	Potentially Minimal Danger	Within 30 working Days
6		
7	No Hazard/de minimus violation	No Response

\*Indicates GSFC inspections have been conducted, thus initiating the corrective action (meets 29 CFR 1960.26 requirements).

Table 3.5: Health & Safety Inspection Response Periods

## 4.0 FACILITY SURVEY REPORT PROCESS

The following procedures apply to the distributing facility inspection schedules and reports. The SHEtrak report process is defined in Figure 4.0

### 4.1 Schedule applicable survey (Annual or Follow-up).

- a. Enter inspection on the Annual Survey Schedule
- b. Prepare final Annual Schedule
- c. Distribute final Annual Survey Schedule to applicable personnel:
  1. FMD
  2. Building Manager
  3. COR
    - a. COR to submit for posting on Safety 1<sup>st</sup> Website

### 4.2 Perform applicable survey as defined in Section 2.

### 4.3 Prepare applicable report within 10 working days of performing the inspection.

- a. The Inspector will enter findings into the SHEtrak database per the SHEtrak inspector's user guide.
- b. The OS&H Contractor Program Manager will perform a quality review of the report to include but not limited to:
  1. Spelling errors
  2. RAC code appropriateness
  3. Proper assignment of any findings
- c. The OS&H Contract PM will release the inspection to the COR or Technical Area Monitor (TAM).
- d. The COR or TAM will review and release the report to the Customer.

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**4.4 COR/TAM will review the report within 2 working days:**

- a. Review report and release to customers or reject with rationale.

**4.5 Report Follow up**

The SHEtrak system will automatically send follow up emails at the following intervals:

- 50% of the completion time
- 5 days before finding is due
- The day the finding is due
- Daily when the finding is past due

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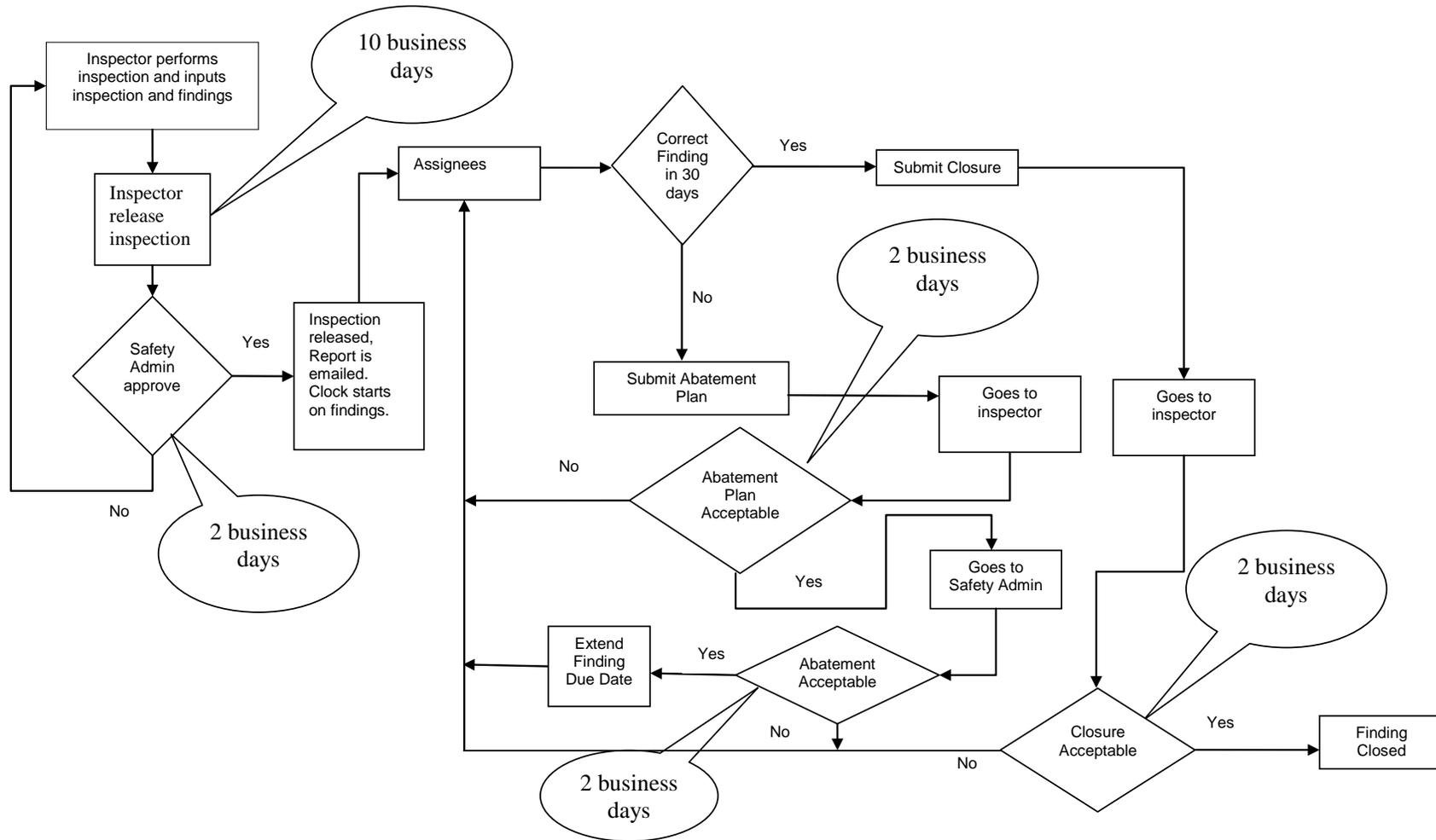


Figure 4.0. SHEtrak Report Process

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## Appendix A – Definitions

- A.1 Risk Assessment Code (RAC)** - A numerical expression of comparative risk of a condition determined by an evaluation of both the potential severity of a consequence and the likelihood of that consequence occurring.
- A.2 Imminent Danger** – A condition or action that may cause death, permanent disability or major system and or facility destruction.
- A.3 Operation** - the entire related task such as roofing on a specific job, specific thermal vacuum chamber, etc.

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## Appendix B – Acronyms

**CFR** Code of Federal Regulations  
**COR** Contractor Officer Representative  
**FMD** Facilities Management Division  
**FOM** Facility Operations Manager  
**GSFC** NASA Goddard Space Flight Center  
**HAP** Hazardous Abatement Plan  
**NASA** National Aeronautics and Space Administration  
**NFPA** National Fire Protection Associations  
**OS&H** Occupational Safety and Health  
**PPE** Personal Protective Equipment  
**RAC** Risk Assessment Code  
**SHEtrak** Safety Health and Environmental Tracking Database  
**TAM** Technical Area Monitor  
**WI** Work Instruction

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### **Appendix C – RAC 1 Items**

RAC 1 – A condition or action that may cause death, permanent disability or major system and or facility destruction.

1. Unprotected falls greater than 10 feet
2. Unprotected trench greater than 5 feet deep
3. Head or chest under suspended load
4. Entry into a permit required confined space without a permit
5. Unauthorized energized electrical work
6. Lack of/Inadequate Lockout Tagout
7. Other issues or circumstances as deemed necessary by Code 350

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**CHANGE HISTORY LOG**

<b>Revision</b>	<b>Effective Date</b>	<b>Description of Changes</b>
Baseline	02/16/11	Initial Release
A	10/30/2013	Updates include: add appendix C, inclusion of stop work process flow chart, add all occupational safety related audit types, and designate SHEtrak as the findings database.

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