

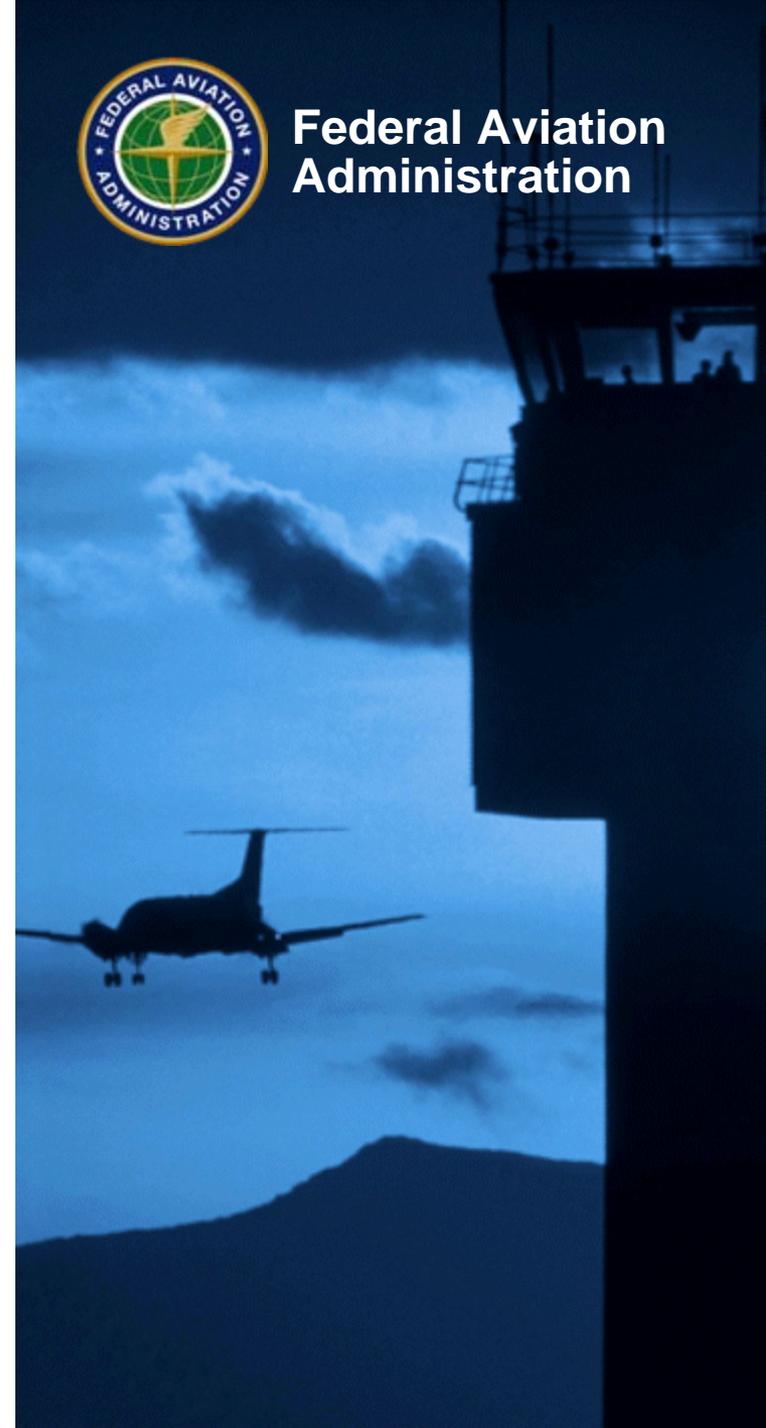
Safety Risk Management Associated with Configuration Management

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**Federal Aviation
Administration**



Notice 1800.2, NCP Process Support of SRM

- Required SRM for all NCPs
- Linked SRM to the NCP Process
- Established CNSRM as a Substitute for SRMDM
- Required SRM before Casefile
 - SRM Documentation must be attached to NCP in WebCM
 - SRM documentation reviewed as part of NCP Must Evaluation process



Concerns with Notice 1800.2

- CNSRM is confusing
 - Substitutes for SRMDM but requires no justification why there are no hazards
 - Allows for the statement that SRM will be done later (but frequently isn't)
- SRM cannot always be completed by casefile
 - May be a concept only at casefile
 - May evolve as the change is developed
 - Evaluation and testing may require changes to the design
- Must Evaluation of SRM creates problems
 - Allows for noncurring on the NCP due to issues with SRM
 - Risk may be accepted by a Vice President but could be overturned by NCP process
 - Essentially requires risk acceptance by consensus which violates SMS policy
- Drawings are problematic
 - Require an NCP but unclear how to complete SRM
- Gives the impression that only NCP type changes require SRM

New Notice 1800.xx

- Separates SRM from the NCP Process
 - SRM is not required at casefile
 - SRM required prior to CCD
- SRM is no longer part of the NCP Must Evaluate process
 - Eliminates Risk Acceptance by Consensus concept
- Establishes CCB Executive Secretary as Gatekeeper
 - Will not allow NCP to be presented to the CCB without SRM
- Eliminates CNSRM as an approved safety document
 - SRMD or SRMDM are the only approved documents



Next Steps

- Finalize Draft Notice
- Send out for a formal comment review
- Resolve formal comments
- Publish final notice
- Still need to resolve issues with drawings and SRM

