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TOC Special Study of WMATA Rule Compliance Activities in Rail Yards Report of General Observations and Preliminary Findings June 20, 2011

Background

As described in Section 13 of the WMATA System Safety Program Plan, WMATA is required to have a process in place to ensure rule compliance. As part of the 2010 Triennial Safety and Security Review, TOC assessed WMATA's rule compliance program. TOC identified several findings related to rule compliance, each of which currently remain as open items. In addition, there are findings from internal WMATA investigations (such as the West Falls Church yard collision of November 2009) which identified areas for improvement in the application and enforcement of WMATA's rail yard safety procedures. This study complements the Triennial Review by identifying additional areas for potential enhancement of existing safety practices.

This document is not intended to be prescriptive, or to make specific procedural or physical recommendations. It is transmitted for WMATA's analysis as an external assessment of current operating practices and conditions. We believe its findings of fact (and their supporting comments) should be evaluated and acted upon promptly through WMATA's established hazard management processes. These processes, outlined within the System Safety Program Plan (SSPP) and approved by TOC, delineate WMATA's ultimate responsibility for analyzing risks posed to the system and allocating resources accordingly.

Between March 25th and May 3rd, TOC representatives conducted a study of WMATA rule compliance efforts within yard limits. This study was conducted to learn more about the processes that WMATA has in place to ensure that Train Operators, Interlocking Operators, and other front line personnel responsible for the movement of trains within yard limits are following established rules and procedures. It was also conducted partially in response to a number of accidents and incidents within yard limits that have been attributed to rule violations and/or human error.

TOC members conducted site visits to various rail yards in Maryland, Virginia and the District of Columbia, accompanied by representatives from WMATA Safety, as well as Rail Transportation supervision, Track & Structures and Quality Assurance in some instances. TOC members observed operations, interviewed managers, supervisors and frontline personnel, and reviewed documents, such as Quality Assurance audit forms and electronic records.

Since 2008, WMATA has experienced a series of incidents and accidents that have been directly attributable to rule or procedure violations, including the following:

11/4/08 at 02:45 – Branch Avenue Yard
Train collision with bumping post
Cause: Rule violation – operator failed to use car wash button to coast

8/26/09 at 18:00 – West Falls Church Yard
Train collision, later referred to as hard coupling of two two-car consists
Injuries: 2 (employees on train)
Cause: Operator error – did not have proper training to operate

11/29/09 at 04:27 – West Falls Church Yard
Train collision
Injuries: 3 (employees on trains)
Cause: Rule violations – yard speed, yard safety stops, cell phone possession

6/7/10 at 5:55 – Branch Avenue Yard
10-car revenue train went in service on the mainline until Anacostia Station.
Cause: Human error

7/17/10 at 01:49 – West Falls Church Yard
Train collision/hard coupling
Cause: Operator/flagman error – excessive speed (preliminary)

10/13/10 at 02:15 – Branch Avenue Yard
Train derailment / collision with bumper post
Injuries: 1 (operator)
Cause: Operator rule violations – failed to make safety stops

2/4/11 at 14:30 – Brentwood Yard
Train collision with shop door
Cause: Rule violations re: entering shops and operating from other than lead car/end

In addition to those incidents listed above, there have been several other incidents within yard limits. As of this report, the investigations remain open, and WMATA has not yet identified a probable cause.

General Observations

- WMATA appears to have several good processes in place to facilitate rule compliance in rail yards. The Safety Blitz initiative, in which multiple departments coordinate to reinforce a specific safety message in response to an identified trend or concern, appears to be one effective tool for responding to problem areas in rule compliance.
- Local Safety Committees appear to effectively facilitate discussion of new and ongoing safety issues at each of the rail yards. Discussions with Safety personnel and a review of a sample of meeting minutes show that WMATA takes employee safety seriously, and that rule compliance issues are indeed discussed at such meetings, as they arise.
- The Safety Department appears to be in the process of better defining the roles and responsibilities of its Local Safety Officers in monitoring rule compliance.
- At this time, TOC does not believe that rail yard rule compliance efforts by WMATA constitute an unacceptable safety hazard requiring significant resource expenditures on physical systems or facilities.

Findings of Fact

1. ***WMATA lacks a consistent plan, policy, or procedure specifying the roles and responsibilities of pertinent WMATA personnel for enforcing rules within yard limits.***
 - At some of the yards, Supervisors are specifically responsible for enforcing rules and overseeing train movements within yard limits, as well as monitoring Interlocking Operators from within the Yard Tower. At other yards, Supervisors are not specifically assigned or responsible for monitoring rule compliance within yard limits.
 - At one yard, the Local Safety Officer proactively monitors operating rule compliance through direct observations, including speed measurements using radar. At other observed yards, Local Safety Officers may monitor rule compliance tangentially to their other safety-related duties, but are not necessarily actively monitoring Train Operators and Interlocking Operators.
 - At one of the rail yards, the Chief Supervisor did not appear to have specific, direct responsibility for monitoring rule compliance within yard limits, while at other yards, the Chief (or Acting Chief) Supervisor either directly monitored rule compliance on a regular basis in the field or in the Yard Tower, or specifically assigned a Rail Supervisor to such tasks.
 - At one of the observed yards, the RTRA Superintendent did not assume direct responsibility for monitoring rule compliance within yard limits, nor was that responsibility delegated to the Chief Supervisor or a Rail Supervisor; rather, they rely upon WMATA Rail Operations Delivery Quality Assurance to monitor rule compliance. At other yards, the RTRA Superintendent either directly monitored rule compliance, or delegated that responsibility to a Chief Supervisor or Rail Supervisor, in addition to the Quality Assurance audits.
2. ***WMATA's Rail Operations Delivery Quality Assurance personnel appear to have a good process in place to monitor rule compliance within rail yards; however, the current level of staffing (two) and their other rule compliance duties (on mainline, in work zones) may not be enough to rely solely upon them to monitor rule compliance in rail yards, as they are relied upon to do so in at least one such location.*** WMATA should consider better defining the roles and responsibilities of the above-described personnel (particularly from SAFE and RTRA) in monitoring rule compliance in rail yards as part of their normal duties. Additionally, or alternatively, WMATA may wish to consider augmenting the personnel resources available to the Rail Operations Delivery Quality Assurance group.
3. ***WMATA currently lacks a policy or procedure for trend analysis of the results of rule compliance checks conducted by various personnel.*** Though Rail Operations Delivery Quality Assurance personnel produce detailed reports of their yard rule compliance activities, there does not appear to be a formal process by which other pertinent personnel shall consult these reports. Additionally, TOC observed no evidence that Rail Supervisors monitoring rule compliance in yard limits were using the Blackberry Check system that they use on mainline. While the Blackberry system has been broadly adopted and implemented for assessing rule compliance during revenue operation, it does not appear to be fully utilized in yards. Trend analysis is one of the most important aspects of a rule compliance program, and WMATA should consider adapting the capabilities of the Blackberry compliance system to better fit yard operations.

Locations Visited:

- West Falls Church Yard
- New Carrollton Yard
- Shady Grove Yard
- Greenbelt Yard

Documents Reviewed:

- Sample of Rail Operations Delivery Quality Assurance Reports
- Sample of Rail Operations Delivery Quality Assurance data entered into Documentum system
- Sample of Local Safety Committee Meeting Minutes