

# **METRO REGULATORY & INTERNAL COMPLIANCE PROGRAM**After Action Review

August 2017

### **AFTER ACTION REVIEW**

## What was Found

### **Internal Review Results**

The initial observations during the Internal Review of the Tunnel Ventilation System identified some specific discrepancies in maintenance documentation, as noted in finding F-TVS-17-07 on page 10 of the <u>report</u>, resulting in a recommendation to perform an investigation of this documentation by an authority not directly responsible for the maintenance activity.

In response to this finding, The responsible parties developed a corrective action plan (CAP), <u>QICO-TVS-17-04</u>, to identify the root-cause of this concern and take any remedial actions as necessary. This plan detailed three (3) actionable items, including an internal investigation, implementation of investigation results and recommendations, and verification of these items by the office of Quality Assurance Internal Compliance & Oversight (QICO) prior to closing the CAP.

The details of the plan are presented on page 25 of the <u>report</u> and progress towards completion is provided in the <u>detailed tracker</u>, page 1, for internal review actions.

## **Investigation Results and Actions Taken**

## **Investigation Summary**

To carry out the first actionable item from the <u>CAP</u>, QICO conducted an investigation into the generation of maintenance documentation for maintenance of the tunnel ventilation system. Through the course of this investigation, QICO identified underlying causes in documentation practices and determined that maintenance records had not been intentionally falsified by maintenance technicians or supervision.

#### **Results & Recommendations**

QICO determined that work items identified in the internal review had been in fact been completed, utilizing other systems of record to confirm work activities. Furthermore, it was determined that differences in documentation were a result of transcription errors and version control issues used in the field. These results were issued with the following summarized recommendations for action:

- Update rules and procedures for records retention.
- Standardize and update Plant Maintenance (PLNT) forms to ensure consistency.
- Institute revision control mechanisms to ensure the appropriate documentation is generated for each maintenance item.

#### Actions Taken

In response to the QICO investigation, responsible parties have made updates to Standard Operating Procedures (SOPs) in order to:

- ✓ Reference the Authority's Records Management Manual
- Establish roles and responsibilities for document control
- Standardize forms used to document maintenance activities
- Set requirements for revision control in maintenance documentation

## Verification

Through each stage of the CAP process, QICO has reviewed the actionable items completed to ensure conformance with the established plan objectives. Progress towards completion of each CAP is made available through the <u>detailed tracker</u> located on WMATA's Transparency page.

## **Next Steps**

# With the investigation and updates to SOPs now complete, QICO will perform follow-up review of implementation of these actions to ensure the resulting actions have been put in place and are effective in addressing the findings.

## Follow-Up and Verification

In the event QICO identifies additional discrepancies in actions taken, QICO will communicate with the responsible parties to coordinate further actions as necessary.

When QICO has verified that the findings and recommendations have been fully addressed and associated actions are complete, this CAP may be closed. Future verification of these closed items will continue in annual reviews of maintenance activities to ensure continued conformance with standards.