

Washington Metropolitan Area Transit Authority

## Board Action/Information Summary

☒ Action ☐ Information

MEAD Number:  
202024

Resolution:  
☐ Yes ☒ No

### TITLE:

Update on FTA and NTSB Actionable Items

### PRESENTATION SUMMARY:

The Department of Safety and Environmental Management (SAFE) will provide an update on the open National Transportation Safety Board (NTSB) and Federal Transit Administration (FTA) Corrective Action Plans (CAPs) and associated actionable items.

### PURPOSE:

This update informs the Safety Committee on the current status of the open NTSB and FTA CAPs. This briefing will publicly communicate the status of the actionable items as Metro continues to close these and all other recommendations as part of improving safety.

### DESCRIPTION:

A Corrective Action Plan (CAP) is a plan developed by WMATA, in response to an FTA/NTSB recommendation or finding, which describes the actions we will take to minimize, control, correct, or eliminate risks and hazards, as well as the schedule for taking those actions.

Open CAPs are those plans that are: in the process of being implemented; or have been fully implemented and are awaiting regulatory review and response. Closed CAPs are those that FTA/NTSB have verified as being fully implemented.

The NTSB and FTA CAPs are managed differently. Upon receipt of an FTA finding or required action, the Authority has 90 days to develop responding CAPs, which includes hazard ratings and mitigation strategy. These CAPs are submitted to the FTA for review and approval, at which point WMATA begins the implementation process.

The NTSB issues Safety Recommendations, which WMATA is responsible for developing responding CAPs. These CAPs are delivered to the NTSB within 90 days of the issuance of the Safety Recommendations. The NTSB does not formally approve the CAPs, but WMATA seeks concurrence prior to implementation.

### Key Highlights:

- There have been 320 Corrective Action Plans (CAPs) assigned to WMATA.
- 158 of the 320 have been closed in the past three years.
- Of the remaining 162 CAPs that are open: 93 are currently being implemented; and 69 have been fully implemented and are awaiting regulatory review and response.

- Each CAP may have multiple actionable items, of which there are 1370. Of that total, 718 have been approved and closed, 408 have been submitted for approval and closure, and the remaining 244 are in the process of being implemented.

## **Background and History:**

The CAPs can be divided into two groups.

The FTA WMATA Safety Oversight (FWSO) CAPs are those that have been assigned as part of the FTA's oversight role. These CAPs are embedded in the FTA's Safety Directives, of which there have been seven issued.

These Directives include:

- 15-1, Safety Management Inspection;
- 16-2, Tri-State Oversight Committee;
- 16-4, Track Integrity Investigation;
- 16-5, Stop Signal Overrun Investigation;
- 16-6, Rail Vehicle Securement Investigation;
- 17-1, Traction Power Electrification Investigation; and
- 18-2, TOC Triennial Safety Findings.

These FTA Directives have resulted in 289 CAPs, of which 152 have been closed. The NTSB CAPs are those that been assigned primarily in response to the L'Enfant Incident. Of the 31 total CAPs, six have been closed.

Some CAPs may take longer than others to implement due to factors such as significant capital investment, complexity of design, availability of technology, production schedules, and other factors.

The CAP closures have contributed to the progress on improving areas such as preventive and corrective maintenance; policy and procedures, and training and recordkeeping. The status of each CAP is posted online for tracking and review at: <https://www.wmata.com/initiatives/transparency/Corrective-Action-Plans.cfm>

## **Discussion:**

Actionable Items:

Actionable Items are attached to each CAP that demonstrate how WMATA will close out the CAP.

A single action may be equivalent to closing a finding in which WMATA developed an overall CAP. However, the majority of the CAPs have numerous Actionable Items that address the specific finding or recommendation.

The number of Actionable Items will continuously change over time (i.e., when a CAP is closed by the FTA or NTSB, or if new ones are added). For example, a new FTA Safety Directive will generate additional CAPs and Actionable Items. The last Safety Directive was issued in April 2018 as part of the TOC Triennial Safety Findings.

Of the current 1370 Actionable Items:

- 718 have been approved and closed;
- 652 are open; 244 are being implemented; and 408 have been fully implemented and are awaiting regulatory review and response.

#### **FUNDING IMPACT:**

No funding impact - Information item only.	
Project Manager:	Patrick Lavin
Project Department/Office:	Department of Safety and Environmental Management

#### **TIMELINE:**

<b>Previous Actions</b>	<ul style="list-style-type: none"> <li>• Memo to Board on January 16, 2018.</li> <li>• Update on FTA and NTSB Actionable Item on November 16, 2017.</li> <li>• NTSB CAP Review on April 27, 2017</li> </ul>
<b>Anticipated actions after presentation</b>	<ul style="list-style-type: none"> <li>• Continue to fully implement all NTSB and FTA CAPs</li> <li>• Continue to implement programs and activities to strengthen the safety culture</li> </ul>

#### **RECOMMENDATION:**

To inform the Board's Safety Committee of the status of open CAPs from the NTSB and FTA.

# Status of Safety Corrective Action Plans

Safety & Operations Committee  
October 11, 2018



## Purpose

- Provide an update on the status of safety corrective action plans

<https://www.wmata.com/initiatives/transparency/Corrective-Action-Plans.cfm>

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# CAP Defined

- What is a Corrective Action Plan (CAP)?
  - A plan developed by WMATA, in response to an FTA/NTSB recommendation or finding, that describes the actions we will take to minimize, control, correct, or eliminate risks and hazards, as well as the schedule for taking those actions

<https://www.wmata.com/initiatives/transparency/Corrective-Action-Plans.cfm>

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# CAP Status Defined

<u>Open</u> <i>Implementing</i>	Mitigation strategy developed; in the process of being implemented.
<u>Open</u> <i>Submitted for Closure</i>	Fully implemented, supporting documentation submitted to the FTA/NTSB for review
<u>Closed</u>	Plan implemented, approved, and closed by FTA/NTSB

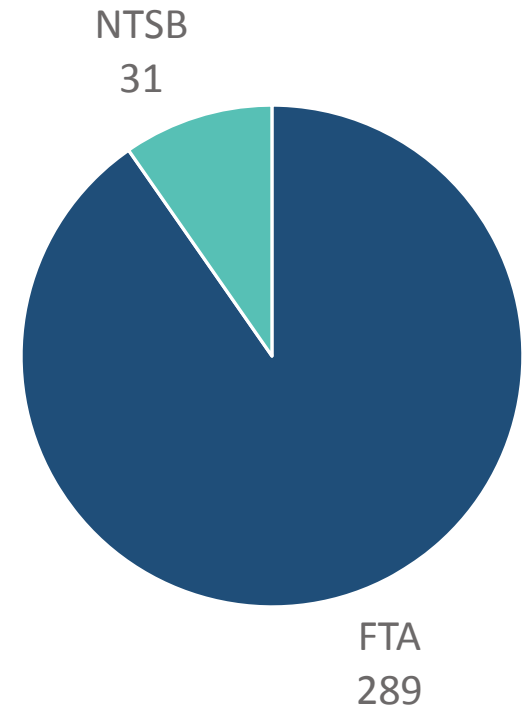
<https://www.wmata.com/initiatives/transparency/Corrective-Action-Plans.cfm>

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# CAPs by Source

- Total of 320 CAPs have been assigned to WMATA
  - All FTA CAP plans have been approved
  - NTSB does not pre-approve CAP actionable items
- 158 of the 320 have been closed in the past three years
  - 57 CAPs have been closed since last Board report in November 2017
- Of the remaining 162 CAPS that are open:
  - 69 CAPs have been completed and submitted for closure
  - 93 CAPs are currently being implemented
- FTA and NTSB corrective action plans are posted online

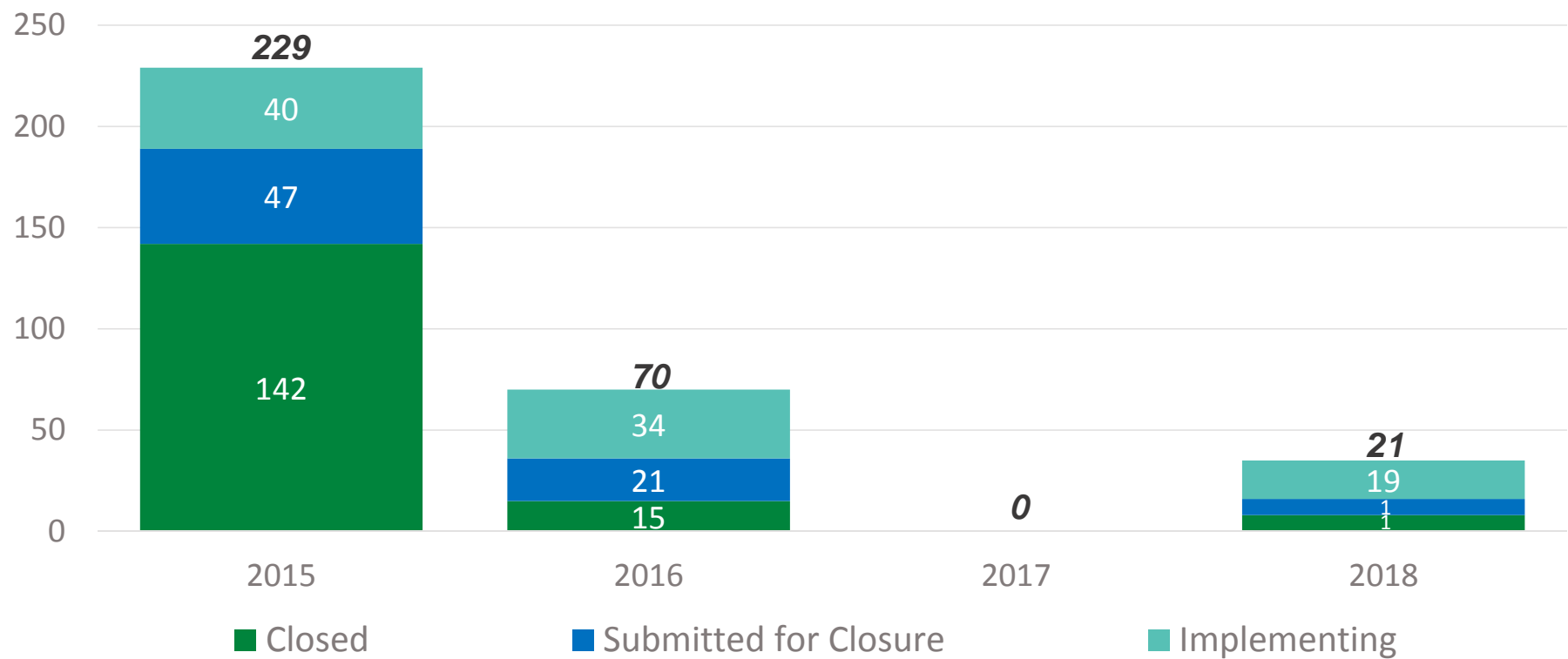


<https://www.wmata.com/initiatives/transparency/Corrective-Action-Plans.cfm>

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## Regulatory CAP Progress\*



\*as of 9/28/18

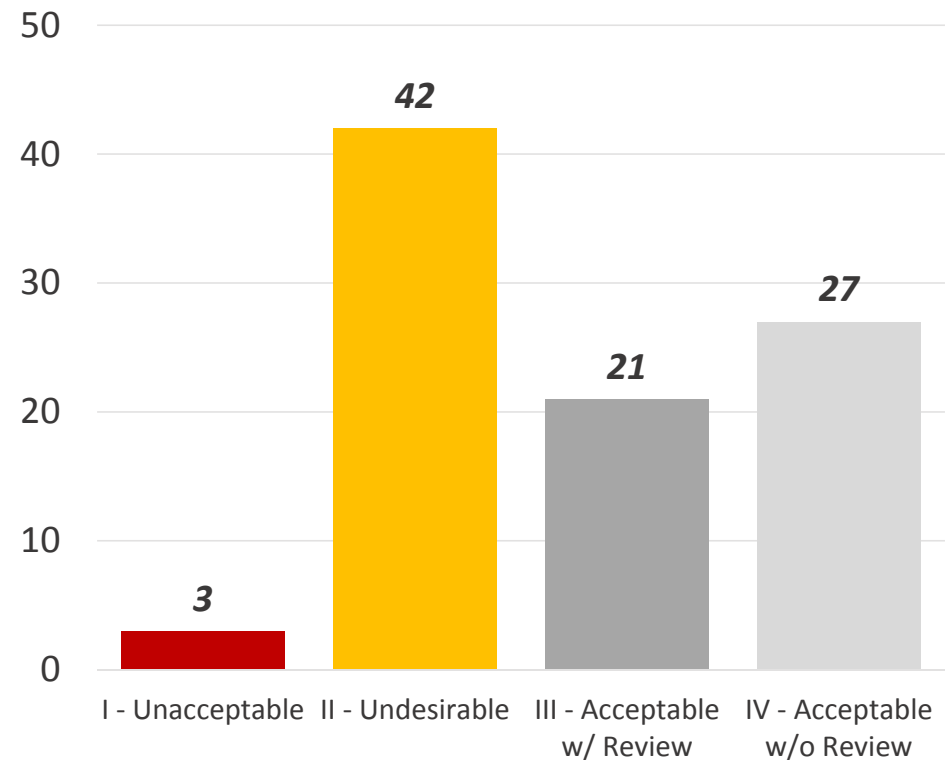
## Status of Safety Corrective Action Plans

# Hazard Ranking\*

*Open CAPs currently being implemented*

### Unacceptable Hazards

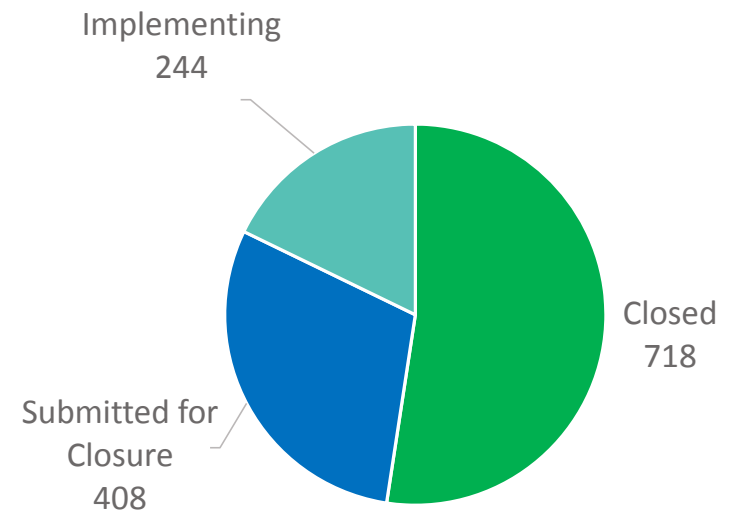
- *FTA TSR-18-001*
  - Ensuring employees are sent for post-accident drug/alcohol testing
- *NTSB-R-08-004 (2x, adopted by TOC)*
  - Bi-directional technology for roadway worker protection



\*as of 9/28/18

# Actionable Items Progress\*

- Under the 320 CAPs, there are 1370 individual actionable items
- 718 of the 1370 have been closed in the past three years
- Actionable Item Status
  - Open – (48%)
    - Implementing (18%)
    - Completed / under review for closure (30%)
  - Closed – (52%)



\*as of 9/28/18

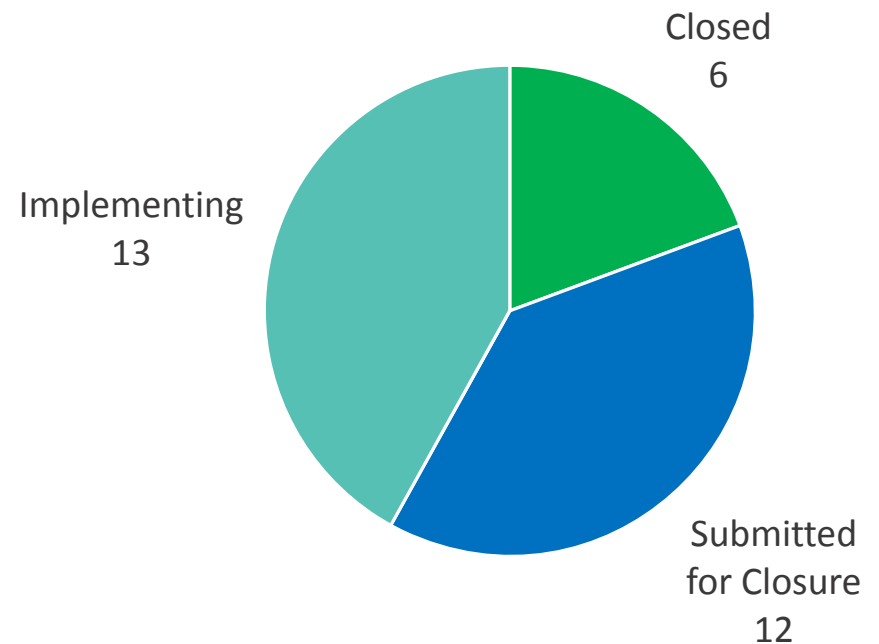
## Status of Safety Corrective Action Plans

# FTA CAP Status

CAP Source	Description	Issue Date	Closed	Submitted	Implementing	Total
Safety Directive 15-1	Safety Management Inspection	June 2015	48	24	19	91
Safety Directive 16-2	Tri-State Oversight Committee	December 2015	89	23	19	131
Safety Directive 16-4	Track Integrity Investigation	August 2016	2	5	5	12
Safety Directive 16-5	Stop Signal Overrun Investigation	August 2016	5	2	4	11
Safety Directive 16-6	Rail Vehicle Securement Investigation	August 2016	4	1	1	6
Special Directive 17-1	Traction Power Electrification Investigation	December 2016	3	1	13	17
Special Directive 18-2	TOC Triennial Safety Findings	April 2018	1	1	19	21
<b>TOTAL</b>			<b>152</b>	<b>57</b>	<b>80</b>	<b>289</b>

# NTSB CAP Status

- CAPs are the result of a variety of incidents
- Oldest CAP is R-08-004
  - Bi-directional technology for roadway worker protection
- Many CAPs require long lead times
  - Significant capital investment
  - Complexity of design
  - Availability of technology
  - Production scheduling



- Notarizer Transportation Safety Board, NTSP)  
Recommendations: Progress Tracker  
As of April 06, 2016
- | WMA's<br>Hazard<br>Risk<br>Severity | Description   | CAPAs |
|-------------------------------------|---|-------|
| I                                   | <b>Interpretation:</b> The hazard must be mitigated at the most immediate opportunity possible.   | 9     |
| II                                  | <b>Interference of Protective Safety Components (ISPC):</b><br><b>Additional required:</b> The hazard must be eliminated, if necessary, through some other very development projects in conjunction with the ISPC, subject to FTA approval. | 18    |
| III                                 | <b>Additional or review:</b> The Chief Safety Officer must be involved if the hazard is adequately controlled or mitigated.   | 7     |
| IV                                  | <b>Acceptable and review:</b> The hazard does not meet immediate obligations, but accepted actions are required.  | 3     |

For hazards with FTA requirements, WMA's Hazard Risk Categories are represented by the amount and probability of occurrence. This is used as a safety management tool for allocating resources to the lowest practicable level.

☒ Closed
 ☐ Open-Interim Decision
 ☐ Pending
 ☐ Submitted
 ☐ In Progress
 ☐ Not Started
- | NTSB #        | NTSB Required Action(s)   | WMA's<br>Hazard<br>Risk<br>Category | Date Closed   | Action<br>Status | WMA's Comments   |
|---------------|---|-------------------------------------|---------------|------------------|--|
| NTSB 8-06-001 | Review all existing and future train equipment with<br>Back Lock Problems   | II                                  | May 2013      | ●                |  |
| NTSB 8-07-029 | Implement QA Procedures to Assess excessive wheel<br>Tread  | II                                  | June 2013     | ●                | Closed   |
| NTSB 8-07-025 | Ensure appropriate coordination between all<br>departments responsible for maintenance and design<br>to resolve issues before new equipment is purchased.   | II                                  | October 2013  | ●                | Closed   |
| NTSB 8-07-025 | Establish a single point of responsibility within CMST<br>to quickly evaluate and incorporate actions identified<br>through accident investigations or related research.  | II                                  | October 2013  | ●                | Closed   |
| NTSB 8-07-027 | Establish written procedures regarding rail lubrication<br>for engine track operations, car switch, demurrals,<br>Unloading of Switch Face - LHM  | II                                  | October 2012  | ●                | Closed   |
| NTSB 8-07-022 | Revised and completed by 2008, the replacement of<br>all RRs of demurrals to guarded turnouts   | II                                  | June 2013     | ●                | Closed   |
| NTSB 8-08-001 | Review and update MSHR to provide for factors of<br>protection for Switcher Worker - adding<br>requirements for Briefings, Signs & Tools<br>enhancement from train - etc. 59.134.   | II                                  | October 2013  | ●                | Closed   |
| NTSB 8-08-002 | Adopt a systematic approach to frequent<br>unannounced checks of equipment performance with<br>historical operating and safety rules and procedures   | II                                  | November 2012 | ●                | Closed   |
| NTSB 8-08-003 | Perform periodic hazard analysis on the deficiencies<br>identified through the Compliance and Operating Rule<br>Check trend data base.  | II                                  | November 2012 | ●                | Closed   |
| NTSB 8-08-004 | Promptly implement appropriate technologies that will<br>intelligently alert variable sections of approaching<br>trains and self-automatically alert train operators<br>when approaching areas with workers on or near the<br>tracks. | II                                  |               | ●                | Closed   |
| NTSB 8-09-009 | Safety redundancy of the train control system,<br>improve track occupancy data in a real time basis to<br>start.  | II                                  | July 2012     | ●                | WMA is addressing NTSB's comments<br>received on March 15, 2016. |

☒ Closed
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 ☐ Submitted
 ☐ In Progress
 ☐ Not Started

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# Questions

