
Subject: FW: <External>Train operator training deficiencies

From: Sharmila Samarasinghe <[REDACTED]@wmasc.gov>
Sent: Friday, January 13, 2023 4:24:53 PM
To: Impastato, Theresa M. <[REDACTED]@wmata.com>
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Subject: <External>Train operator training deficiencies

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Theresa,

As I raised this to you on December 23, 2022, the WMSC has identified new, specific operational safety concerns regarding Metrorail actively ignoring its train operator training and certification processes that are designed to provide for the safety of riders, workers and others.

These actions directly contradict, among other things, Metrorail's PTASP section 5.1.1 that states the training and certification policies for train operators will be carried out, including actual train operation with an instructor.

These new safety issues are in addition to other safety issues regarding uncertified train operators that the WMSC identified and communicated to Metrorail in 2021 and 2022 that Metrorail had begun to address. As noted below, **complete the required actions at the conclusion of this message by 3 p.m. January 17, 2023.**

Operators who have not completed training are operating trains in passenger service

The WMSC's investigation of a December 6, 2022 red signal overrun, along with other investigations and inspection activities, demonstrate that Metrorail is systematically allowing trainee train operators to begin operating trains in passenger service despite not completing Metrorail's required safety training. For clarity, this lack of training is based on Metrorail's current requirements, and does not account for the open corrective action plans (CAPs) that document Metrorail's commitments to address WMSC findings including Rail Operations Audit (issued April 2022) Finding 3 by further improving training and training requirements to provide for the safety of riders, workers and first responders. Metrorail has missed the first deadline regarding this specific CAP, demonstrating Metrorail's additional organizational indifference to the safety of riders and workers.

This fall, the WMSC learned of and then raised questions about Metrorail Operations leadership attempting to reduce hands-on train operator training by 40 percent, which led to the WMSC meeting with Operations leadership in November. At the end of that meeting, Metrorail stated it would not make that change. However, the WMSC has identified that Metrorail has, in fact, been progressing train operator trainees through to operating trains in passenger service despite these trainees not completing Metrorail's required hands-on training. Metrorail has developed the training course to provide a level of assurance that train operators have the required information, level of understanding, and detailed experience necessary to ensure that they are prepared to successfully and safely operate the equipment in compliance with all procedures and checklists in both ideal conditions and emergencies or unusual conditions.

Metrorail is deliberately ignoring these safety requirements.

WMSC inspections have identified that Metrorail has reduced hands on experience with trains in yards and has stopped providing any meaningful mainline “stick time”, the time operating trains with a trained instructor, for train operator trainees during yard practical training, despite Metrorail’s documented requirements to demonstrate the ability to successfully and safely operate a train with an instructor prior to progression to on-the-job training and regular passenger service operation.

For example, records show that the train operator involved in the December 6, 2022 red signal overrun completed only 9 minutes of the 8 hours of required time actually operating a train during yard practical training. The train operator’s post-event investigative interview and radio recordings related to this event demonstrate that the operator had not reached the required understanding to safely operate the train in this event, even though they had just been certified the week before.

A train operator involved in the December 31, 2022 station overrun of Dunn Loring Station, who had been certified for the first time on October 17, 2022, stated that they did not operate a train on mainline in yard practical training. The training deficiencies are not the only cause of these events, however, they are demonstrations of the impact on the overall safety of the system, and these are examples of individuals where the WMSC has reviewed training data.

Placing service over safety training: Train availability

The WMSC has been informed that Operations leadership directed senior managers to make no trains should be made available for training, and instead that available trains could only be used for passenger service. This was communicated directly by Operations leadership in a meeting among multiple Metrorail individuals. The WMSC notes that the lack of available trains for training and certification is one factor that contributed to Metrorail’s extensive use of uncertified train operators in 2021 and 2022, and is an issue that Metrorail has committed to addressing in the CAP to resolve Finding 5 of the Rail Operations Audit issued in April 2022.

Despite safety commitments made by Metrorail in spring 2022 after the WMSC identified that Metrorail was using uncertified train operators, and despite commitments in Metrorail’s corrective action plan to address Finding 5 of the Rail Operations Audit, Metrorail is not consistently making trains available for the necessary training.

The WMSC is concerned that Metrorail may be progressing untrained operators and preventing trainees from getting necessary training due to pressures to operate scheduled service, rather than based on a demonstration of their ability to operate safely or Metrorail’s ability to operate that scheduled service safely.

The WMSC’s investigation of a November 16, 2022 event where a train operator passed roadway personnel at excessive speed has identified that the train operator had worked 30 consecutive days. Many of these shifts leading up to this event on the Red Line involved extended and varying hours. Metrorail has fatigue management and related policies that, as documented in our 2021 Fitness for Duty Audit, Metrorail continues to ignore. Our follow up actions in this investigation have already included identifying that Metrorail is significantly short on train operators each day, and has been significantly short for at least several months even with reduced schedules. That shortage created by Metrorail is not an excuse for placing untrained, uncertified or fatigued personnel in these roles.

Open Corrective Action Plans (CAPs): Metrorail lacks urgency to address known hazards

Metrorail is behind schedule on CAPs including the CAP to address the Rail Operations Audit finding in 2022 that Metrorail has created safety risks by not requiring and conducting territory familiarization and physical characteristics training, and by not assessing knowledge of physical characteristics prior to assigning operations personnel work on a line, in a terminal or in a yard.

The investigation into the December 6, 2022 red signal overrun demonstrates another example of Metrorail’s insufficient physical characteristics and territory familiarization activities for train operators and other personnel that has created the risk of serious injury or death. The train operator did not know where they were in the system. This is in addition to events such as W-0128 on July 16, 2021 when a train operator did not know Franconia-Springfield Station was the end of the line, leading to improper movement into a tail track, and investigation W-0093 involving a train

operator who improperly moved into a single-tracking area, creating the risk of a head-on collision between passenger trains. Yet, Metrorail has not even completed the first action item of this corrective action plan, which was due on November 30, 2022.

Metrorail committed to reviewing the current line familiarization training to identify necessary updates and to provide the results of the assessment to the WMSC by November 30, 2022. The fact that Metrorail has not even done this basic initial action item demonstrates Metrorail is not carrying out its safety commitments.

Similar issues regarding system familiarization have contributed to fatal accidents elsewhere, such as the fatal Amtrak Train 501 derailment in DuPont, Washington on December 18, 2017. The NTSB found that the probable cause of the derailment included inadequate training for the engineer on the territory (RAR-19/01). Metrorail must act with urgency to address this known hazard.

Metrorail has other open corrective action plans, including those related to the findings from the WMSC's Rail Operations Audit issued in April 2022, that Metrorail has committed to implementing. However, the WMSC's oversight suggests Metrorail is not fully carrying out these safety commitments and further WMSC action may be required.

It is imperative to the safety of the public and Metrorail workers that Metrorail provide all necessary safety training and ensure that operators and any other personnel are properly certified and fit for duty in accordance with Metrorail safety procedures prior to putting those personnel in charge of the safety of passengers, workers and first responders.

Actions:

By 3 p.m. January 18, 2023, provide:

1. A list of all train operators who Metrorail designated "certified" since January 1, 2022 without completing all of Metrorail's documented training requirements.
2. The list of requirements those personnel did not meet.
3. The list of job assignments and work activities for each of these operators from "certification" to present.
4. Verification that each of these operators have been removed from assignments as train operators as of 5 a.m. January 18, 2022
5. Verification that each of these personnel will not operate as a certified train operator until all requirements, including completing all classroom training and all yard practical training, are met.
6. The list of personnel currently in or currently scheduled to be in training for initial train operator certification, and the scheduled dates for classroom training, yard practical training, field training with a line platform instructor (LPI), and potential certification date ranges.
7. A list of all currently certified train operators, and their date of last certification.
8. Completed action item 1 of CAP C-0183

Thank you.

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