

From: [REDACTED] PII
To: [Gregory Georgetta](#)
Cc: [Turpin Ted](#); [Bucher David](#)
Subject: RE: NJT SSPP and APTA audit question
Date: Thursday, January 18, 2018 8:06:47 AM
Attachments: [image004.png](#)

Georgetta,

According to our records, the first SSPP developed is dated September 1, 1997.

Prior to the audit in 2012, APTA conducted audits at NJ TRANSIT 1) September 26 – October 7, 2005, 2) November 10 – 21, 2008, and 3) July 15 – 26, 2002.

The NJ TRANSIT Rail Safety Operations Review that you refer to took place in 2014. Here are the findings, as provided by the review team of TUVRheinland:

1. The process for efficiency testing of employees by operation supervisors is not being properly conducted according to the intent of 49 CFR Parts 217, 218, 240, and 242 or as described in NJT Test Qualification System TRO-10. Action is needed immediately to bolster the number, time, location, and quality of efficiency tests being performed as well as increasing the assessed disciplinary action resulting from repeated test failures. As was noted by the RSC auditor, insufficient testing is occurring in some departments and the response to failure does not correspond to the seriousness of the failures. The conduct of testing needs to be spread among managers and supervisors in a better shift distribution to ensure departmental and individual quotas are met, and to ensure that FRA requirements for quality tests are fulfilled. Examples of efficiency testing disciplinary shortfalls include, but were not limited to the following:
 - a. Train dispatcher with 19 failures during the year: The TQS results column indicated 19 verbal counseling. In those 19 failures were 6 instances of multiple failures of the same rule.
 - b. B&B Foreman with 10 failures during the year: The TQS results column indicated 10 verbal counseling. In those 10 failures were 2 instances of multiple failure of the same rule.
 - c. Assistant conductor with 5 failures during the year: The TQS results column indicated 5 verbal counseling. In those 5 failures was 1 instance of multiple failure of the same rule.
 - d. Trackman with 24 failures during the year: The TQS results indicated 24 verbal counseling. In those 24 failures were 4 instances of multiple failure of the same rule.
2. Upper management needs to exert more influence on middle and supervisory management to instill the proper safety culture throughout the workforce. From the results of the survey and interviews conducted, upper management

believes that the word on safety is getting across to the workforce, while the workers themselves do not agree, nor do they believe upper management is sincere in its promotion of safety as the #1 priority of the railroad operation. Promotion of safety at the local level depends on local (field) management and supervision being intimately involved in setting safety as the #1 priority of the company.

3. The Safety Department (to become the Office of Safety) needs to take a far more proactive role in addressing problems and concerns in the field. The survey respondents in general rated the effectiveness of the Safety Department as less than neutral, (or somewhat negative). Results of informal and formal interviews also found that employees do not feel the safety department is active enough in the field, and they identify the Safety Department's primary activity as being incident investigation and reporting. They generally expressed that this incident investigation activity is overly complicated and reflects a bureaucratic approach to details of the incident or injury being reported, particularly where the event is of a minor nature. Two levels of reporting were suggested, one for minor incidents and a more detailed report for events of significant injury or damage.
4. Reinforce the importance of daily job briefings. There were many employee reports that the job briefings seemed perfunctory and non-participative. No additional job safety information was provided. The "Rule of the Day" was often seen as being irrelevant to the team's area of work and was quickly dismissed.
5. Evaluate all existing NJT training programs and create cohesive programs with formal learning plans, reformatted training materials, standardized testing, and qualifying requirements. Incorporate and emphasize safety [best] practices, related NIT rules, and FRA requirements into course material.
6. Incorporate more field exposure for the trainees in new employee training, especially centered on the actual jobs they will be performing. Mechanical trainees should be exposed to the shop and yard environment and the movement of equipment in the yard. Roadway Worker trainees need to be located trackside with an active crew to be exposed to the movement of trains and RWP needs and similar assignments made for other departments.
7. Field supervisory management needs to be more proactive in dealing with the safety of their Agreement Employees, including additional safety instruction and communication. Further, management needs to be more accepting of feedback from the employees. Supervision should be more responsive to employee concerns and reports of hazardous conditions. They should enlist the help of the Safety Department where necessary.
8. Initiate management-led, location-specific training on the up-to-date Blue Signal system maintenance procedures (SMPs) for each yard and terminal location. Instruct employees on the purpose and proper application of Blue Signal Protection, as prescribed in the individual SMPs and NIT TRO-5,

including affected tracks, switches, derails, locking devices, responsibility, etc. Ensure that all employees receive training for all yard locations where they will perform work.

9. Improve configuration management functions and make them more consistent across the several departments. The CM processes are not consistent nor are they coordinated among groups with CM duties.
10. NJT needs to address the hazard of Blue Signal Protection affecting carmen working on equipment in yards. Flags are removed when Mechanical work is complete and protection is not provided to carmen remaining on the cars. This is considered an unsafe practice because workers on the cars are subject to those cars being coupled and or moved while they are still working, potentially causing falls and injuries of a significant nature. Several carmen reported incidents with equipment being coupled or moved while cleaning was going on, etc.
11. Reinforce the rules for Personal Protective Equipment (PPE) and explain how these rules are to be consistently applied across all NJT Rail operations.

Prior to 2011, with the exception of the very first one developed in 1997 (which was named System Safety Program Plan), SSPPs were called Rail System Safety Program Plan.

Gardner C. Tabon
Chief Office of System Safety
New Jersey Transit
One Penn Plaza East
Newark, NJ 07105-2246

PII

Taisha Ellington Johnson
Special Assistant

PII



"The supreme quality for leadership is unquestionably integrity. Without it, no real success is possible, no matter whether it is on a section gang, a football field, in an army, or in an office." -Dwight D. Eisenhower

From: Gregory Georgetta [PII]
Sent: Wednesday, January 17, 2018 3:51 PM
To: Tabon, Gardner C. (COSSGCT)
Cc: Turpin Ted; Bucher David
Subject: NJT SSPP and APTA audit question
Importance: High

Gardner,

I hope you had wonderful holidays and are doing well.

Can you provide me with the original date of NJT's system safety program plan? I know that at the time of the Hoboken accident, the effective date of the SSPP was October 2011, but what was the date of the first plan?

Also, can you give me dates of the previous 3 APTA audits prior to this accident? I think you had one in 2012 and had deferred the next one from 2015 to an external audit you had planned. Who did that external audit and what were the findings?

Lastly, if prior to October 2011 your safety plan was called something else, please provide that.

I left you a voice mail earlier too.

Thanks!

Georgetta Gregory
Railroad Investigator
National Transportation Safety Board

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[Redacted]
[Redacted]
[Redacted] PII [Redacted]
[Redacted]



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