NATIONAL RAILROAD PASSENGER CORPORATION
Wilmington Training Center, One High Speed Way, Wilmington, DE 19801

AMTRAK

The Honorable Robert L. Sumwalt
Chairman
National Transportation Safety Board
[redacted]

RRD18FR006

Dear Chairman Sumwalt,

We appreciate the assistance and guidance of the NTSB throughout the investigative process into the Maintenance of Way accident that occurred on April 24, 2018 near Bowie, Maryland involving Amtrak Train 86. In advance of the upcoming investigation report, Amtrak would like to highlight the positive mitigation actions taken since the accident. We respectfully request that the NTSB consider this submission prior to issuing its final report and that this submission become part of the official public record. We welcome any questions following your review of this submission.

In response to this accident, Amtrak has taken multiple actions to increase safety and mitigate hazards to Maintenance of Way (MoW) operations. To provide an objective view of the system and processes, Amtrak commissioned a third-party vendor to conduct a risk assessment (attachment 1), which was completed on August 19, 2019 to evaluate the current Train Approach Warning (TAW) process. The outcome of this initial assessment provided multiple recommendations, many of which Amtrak has proactively acted upon. These include introducing technology solutions, revising the slow-by process, testing portable fencing, the Safety Risk Management Process, reintroducing the hot spots manual, combining the Site Specific Safe Work Plan (SSSWP) and Job Briefing critical items, introducing aerial stands, increasing pertinent training, evaluating radio communication assets, and continuing to instill just culture principles.

Amtrak also requests that the NTSB review the risk assessment in regard to satisfying the requirements of NTSB recommendation, R-17-023 (Public Docket PB2018-100263).

Roadway Worker Technology

Amtrak has been testing various radio frequency roadway worker alerting systems as an additional layer of safety. The current testing has yielded positive results and Amtrak is currently evaluating operational use throughout the system. This technology provides both aural and visual warnings, in addition to the normal Watchman Lookout required communications. Similar systems are currently being used throughout the rail and transit industry and have been encouraged by regulatory authorities.

Slow-Order Process

Additionally, Amtrak implemented a slow-order process 175-S2 (attachment 2) and decreased train speeds entering TAW work zones to no greater than 60 miles per hour (88 feet per second), where previously it was 80 mph or greater and was limited to certain Railroad Maintenance Machines (RMMs), which included the undercutter and track laying machine (TLM). This change in speed and process now provides increased awareness and reaction times for locomotive engineers and roadway workers and decreases vortices produced by single or multiple consists transiting the work zone. In addition, the current procedure allows a RWIC to request lower speeds in higher risk locations. Amtrak continues to evaluate the process to reduce operational risk.

Portable Fencing

Amtrak has deployed portable fencing solutions in certain locations that provide a physical and visual increase in situational awareness to Maintenance of Way employees with respect to track and work zone limits. This has proven especially effective in confined work zones, such as portals, tunnels, and collocated station platform locations. Feedback has been positive from both frontline employees and management.

Safety Risk Management Process

As part of Amtrak's Safety Management System (SMS) implementation, the engineering department in facilitation with our System Safety Working Groups performed a comprehensive risk assessment of multiple operational areas using our safety risk management process. This process yielded a prioritization of multiple safety hazards to personnel and equipment. Management is currently leveraging the results of this process by continuing to work with both labor and stakeholders to reduce identified hazards to the lowest possible risk levels through a systematic and collaborative approach.

Hot Spots

On August 20, 2018, Amtrak reintroduced and updated its "Hot Spots" guide, to include a sight distance chart and a foot-per-second calculation. In addition, Amtrak has added additional scenarios in the annual roadway worker training curriculum, focusing on watchman placement in varying environmental conditions. These changes will aid roadway workers in determining the proper clear time, sight distances, and placement of watchman lookouts.

SSSWP and Job Briefing

Amtrak has determined through feedback and collaboration that the current Site-Specific Safety Work Plan (SSSWP) and Job Briefings do not provide succinct engagement, interaction, and verification that the Roadway Worker In-Charge (RWIC) and roadway workers are confident and consistent in understanding pertinent information. The Engineering Department in coordination with System Safety and various stakeholders are currently developing a revised SSSWP and Job Briefing. The latest versions are currently being tested with frontline work gangs.

Aerial Stands

Amtrak has currently tested and evaluated pole mounted stands in numerous locations that have steep drop- offs and do not provide an ideal area for a watchman lookout to stand and monitor train movements. This evaluation validated the use of aerial stands in providing a safe area for a watchman lookout to monitor trains, alert their work gangs, and increase sight distance. Amtrak is currently procuring twenty stands to be used throughout the system.

RWP Training

Amtrak has undertaken the rapid deployment of focused RWP training to frontline employees and contractors to ensure the highest levels of safety throughout the system. Multiple RWP training modules and curriculum have been revised to provide performance-based training in accordance with forthcoming 49 CFR Part 243 standards. So far, 3735 MoW personnel have completed this training.

Radio Communication Assets

Working communication assets are critical to Amtrak and railroad operations. The Engineering Department has undertaken a comprehensive review of their current systems to include land mobile radio (LMR) assets, antennas, and infrastructure. The outcome of this review will aid in prioritizing assets and infrastructure that need to be repaired or replaced in accordance with the State of Good Repair (SOGR).

C3RS and Voluntary Safety Reporting

Amtrak has also worked collaboratively internally, especially with engineering agreement employees to collaborate and approve the engineering department's program (approved August 2018), which provides an additional communication channel for safety reporting. To date we have received several comprehensive reports which have been jointly reviewed between management and labor and have led to detailed, and targeted, safety messaging being provided to the workforce. Additionally, Amtrak has made the positive investment in hiring a dedicated Director of Voluntary Safety Reporting that started in September 2019, which brings standardization and consistency to our programs.

Just Culture

Amtrak continues to lead the industry in adopting an SMS and instilling just culture throughout our organization. It has been proven that organizations that embrace a robust just culture have positive safety outcomes. Amtrak management has been training its leadership in just culture methodologies, is working to revise its discipline policy, and encourages voluntary safety reporting by all employees. Amtrak submitted our System Safety Program plan to the FRA on November 1, 2018. We are preparing to submit our annual update on November 1, 2019. These submittals continue to be well in advance of any regulatory requirement.

Amtrak pledges to continue working closely with internal resources, industry stakeholders, and regulatory authorities to improve the safety of railroad operations. We wish to express our continued commitment to implementing a Safety Management System and look forward to the findings and recommendations of the National Transportation Safety Board.

Sincerely,

[redacted]

Justin A Meko
Vice President Safety, Training & Compliance