



**Survival Factors Investigation- Norfolk Southern
Post-accident Action Response**

**Reed, PA
RRD22LR003**

(3 pages)

Harley Sheryl

From: Gibson, Dwayne [REDACTED]
Sent: Thursday, April 14, 2022 8:14 AM
To: Harley Sheryl
Cc: Young, Joseph; Hoepf Michael
Subject: RE: NS Post-accident Action

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Sheryl –

Here is a follow-up on Norfolk Southern's actions post-accident to address the 2 safety concerns brought forth by the NTSB.

To address Safety Item #1 – We have issued additional training to all Program Maintenance Supervision on NS Safety Rule 1044 to address the requirements of ANSI Class 2 & 3 Reflective apparel. This training also addressed the requirement for this reflective apparel to be worn as the outside garment and addressed the requirement that this rule not only applies to NS employees but also contractors working on NS property. This training has been conducted with all of our Program Maintenance employees. We are also stressing with outside contractors the need for them to fully train and supervise their employees on these requirements as well.

To address Safety Item #2 – We have issued instructions to all of our Program Maintenance Supervisors and employees that during our job briefings moving forward, we will communicate our closest accessible geographical location in the case of an emergency during our work. In addition, we have submitted the NTSB's recommendation to our Norfolk Southern Safety department for consideration to include in future job briefings for all NS employees.

Thanks,
Dwayne

From: Harley Sheryl [REDACTED]
Sent: Wednesday, March 23, 2022 3:29 PM
To: Young, Joseph [REDACTED]; Gibson, Dwayne [REDACTED]
Subject: [EXTERNAL] RE: NS Post-accident Action

Good Afternoon,

I'm just following up on this email about NS's Post-accident actions. Again, the first two points are issues that the NTSB feels need to be addressed. The third, safe walking conditions, is an issue that is currently being studied by the agency but is not being pursued in this investigation. Thank you.

Sheryl

From: Harley Sheryl
Sent: Monday, February 28, 2022 12:18 PM
To: Young, Joseph [REDACTED]; Gibson, Dwayne [REDACTED]
Subject: NS Post-accident Action

Good Afternoon,

As the investigation moves into the report development phase, we wanted to give the parties an opportunity to provide their intent to take action to address safety issues that arose out of the investigation. We believe that providing guidance and allowing entities to pro-actively address the issue is the more constructive way of solving the problem without having to throw paper (a recommendation) at the entity.

For the Survival Factors investigation, two safety issues were discovered.

- (1) NS supervisors are aware of NS Safety Rule 1044 and clearly know what it says but have no idea what the actual meaning of the regulation is. Specifically, it is impossible for supervisors to manage safety compliance with company PPE policy when they don't know what constitutes the company's own policy. To wit: neither supervisor knew what constituted an ANSI Class 2 garment. Neither supervisor recognized that the coat worn by the worker did not comply with the policy and that the only portion of his clothing that met the requirement was the shirt he was wearing under the coat which once again violated NS policy that states that the required PPE must be the top garment or top layer of clothing. Additional employee and supervisory training could adequately address this issue.
- (2) NS dependence on one person to know the location of its work crew and to be able to relay that information is inadequate as a safety procedure. The issue can be readily addressed by providing an additional item in the job safety briefing, providing all workers with their geographical location, in the event of an emergency. In the Reed investigation, 3 minutes elapsed as the 911 operator worked to locate the actual location of the accident, despite being provided with erroneous locations provided by callers. Though this was not causal in the outcome of the accident, it could potentially be fatal if allowed to continue. NS as well as all railroads must remember that Emergency Communications Centers CAD systems do not use railroad locators for identifying accident locations and providing the appropriate emergency response. Workers should be provided with their location during the job safety briefing. This would require only an additional minute. Even if the RWIC is tasked with calling 911, it is important that everyone knows where they are, especially if the RWIC ends up being the worker that needs the emergency medical assistance. Coordination with local PSAPs (Public Safety Access Points), 911 Call Centers may be necessary to ensure that the locations exist in the CAD system database.
- (3) Safe Walking Conditions- In recent years, the NTSB has investigated several accidents where unsafe walking conditions were found as part of the environment the workers were exposed to. Unsafe walking conditions were noted in the Reed investigation, though it was not causal in the accident. The NTSB has been in communications with both the FRA and OSHA to examine this issue. Though the FRA doesn't have any current regulations that cover walking conditions and OSHA delegated its authority over railroads and railroad workers to the FRA, the U.S. Secretary of Labor still has the ultimate jurisdiction over the safety of U.S. Workers. In Reed, it was noted that work crews were required to step over obstacles (debris piles) on the east side of the track and traverse the sloping grade on slippery ballast on the west side of the track. There is no intent, at this time, to address this either in the final report or make recommendations, we are alerting all railroads and industries, involved in these accidents, that these conditions are being noted by the NTSB.

I look forward to hearing from you and getting your response. Again, the NTSB likes to acknowledge the work done to improve safety by all parties. Personally, I believe that a post-accident action to address this issue goes a long way to achieve a safer working environment for NS employees and their contractors. Please feel free to contact me if you have any questions. Thank you.

Sheryl

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