

**Oliver Stewart RAIB  
Recommendation Handling Manager**



11 October 2022

Mr Andy Lewis  
Deputy Chief Inspector of Rail  
Accidents Cullen House  
Berkshire Copse Rd  
Aldershot  
Hampshire GU11 2HP

Dear Andy,

**RAIB Report: Train struck and damaged by equipment case door in Watford tunnel on 26 October 2014**

I write to provide an update<sup>1</sup> on the action taken in respect of recommendation 4 addressed to ORR in the above report, published on 13 August 2015.

The annex to this letter provides details of actions taken in response to the recommendation and the status decided by ORR. The status of recommendation 4 is **'Implemented'**.

We do not propose to take any further action in respect of the recommendation, unless we become aware that any of the information provided has become inaccurate, in which case I will write to you again.

We will publish this response on the ORR website on 12 October 2022.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Oliver Stewart', written in a cursive style.

Oliver Stewart

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<sup>1</sup> In accordance with Regulation 12(2)(b) of the Railways (Accident Investigation and Reporting) Regulations 2005

## Recommendation 4

*The intent of this recommendation is for Network Rail to reduce the risk arising from equipment that has the potential to foul the gauge.*

Network Rail should establish a policy and guidance on managing the risk from lineside equipment that can foul the gauge, with specific consideration of the siting of equipment in areas of limited clearance and, for example, the use of refuges in tunnels for that purpose.

### ORR decision

1. Network Rail has revised the installation handbook (NR/L3/SIG/11303/2G05) to include requirements for the siting of cabinets, including a clear statement that *'Minimum structure clearances shall be maintained for the full movement of location doors'*.



NR\_L3\_SIG\_11303\_2  
G05 revised.pdf

2. Although Network Rail initially provided a closure statement for the recommendation in December 2018, it was necessary to review the HAZID/HAZOP that supported the action taken, before deciding if it had been implemented. The refuges HAZID is based on the discussion around the existing controls to manage structure clearances and is linked to the review meetings which formed the HAZOP.



Refuges HAZID  
v1.xlsx

The incident at Watford came about as the placing of the cabinet circumvented design, validation and assurance controls, which was enabled by circumvention of the product approval process.

Network Rail concluded that the existing controls for the risk of equipment fouling the gauge did so to a tolerable level, providing they were followed correctly. Therefore Network Rail focused on strengthening how that message was communicated. For location case design, 2G05 was revised, and briefing of staff undertaken on the incident. A Share With Pain (see attached) document was issued to contractors to propagate the learning from the incident.



Watford Share with  
Pain.pdf

3. After reviewing the information provided ORR has concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, Network Rail has:

- taken the recommendation into consideration; and

- has taken action to implement it

**Status: Implemented.**

### **Previously reported to RAIB**

4. On 3 August 2016 ORR reported the following:

Network Rail is taking appropriate action to address the risk arising from equipment that has the potential to foul the gauge and has realistic timescale for completing the work. Network Rail is carrying out HAZID and HAZOP reviews to inform guidance that should address the risks arising from equipment that has the potential to foul the gauge.

### **Update**

5. On 18 December 2018 Network Rail provided the following closure statement:



Engineering\_RAIB\_Re  
commendation\_Event

## Previously reported to RAIB

### Recommendation 4

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Network Rail should establish a policy and guidance on managing the risk from lineside equipment that can foul the gauge, with specific consideration of the siting of equipment in areas of limited clearance and, for example, the use of refuges in tunnels for that purpose.

### ORR decision

1. Network Rail is taking appropriate action to address the risk arising from equipment that has the potential to foul the gauge and has realistic timescale for completing the work. Network Rail is carrying out HAZID and HAZOP reviews to inform guidance that should address the risks arising from equipment that has the potential to foul the gauge.

2. After reviewing the information provided ORR has concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, Network Rail has:

- taken the recommendation into consideration; and
- is taking action to implement it by 31 August 2016

**Status: Implementation ongoing. ORR will advise RAIB when actions to address this recommendation have been completed.**

### Information in support of ORR decision

3. On 9 March 2016, Network Rail provided the following initial response:

*Network Rail will convene a HAZID and HAZOP involving representatives from Engineering disciplines, occupational risk, Operations and the safety and risk team. The HAZID/HAZOP will aim to inform the policy setting and preparation of guidance for managing the risk from lineside equipment that can foul the gauge, with specific consideration of the siting of equipment in areas of limited clearance situations where physical restrictions require additional gauge clearance considerations.*

*Following the HAZID/HAZOP work, Network Rail will update policy and guidance documentation to describe the intentions for managing the risk from lineside equipment that can foul the gauge, particularly the intended use of legacy refuges in tunnels and on viaducts, which are within red zone restricted areas.*

4. The Network Rail response set a deadline of 31 August 2016 for completion of the work.