

Chris O'Doherty
RAIB relationship and recommendation handling manager
Tel No: 020 7282 3752
Email: chris.o'doherty@orr.gsi.gov.uk



22 January 2014

Ms Carolyn Griffiths
Chief Inspector of Accidents
Rail Accident Investigation Branch
Block A, 2nd Floor
Dukes Court
Dukes Street
Woking GU21 5BH

Dear Carolyn

RAIB report: Runaway and derailment of wagons at Ashburys

I write to update you on the consideration given and action taken in respect of recommendation 1 addressed to ORR in the above report, published on 24 March 2011.

The annex to this letter provides details of the consideration given/action taken in respect of the recommendation which is subject to non-implementation.

We do not intend to take any further action in respect of this recommendation unless we become aware of an inaccuracy in which case I will write to you again.

Yours Sincerely

Chris O'Doherty

1. On 29 June 2012, we reported to RAIB that recommendations 2, 3, 4 and 5 had been implemented and on 4 December 2013 we reported that recommendation 6 had been implemented'. Further consideration and actions taken in respect of recommendation 1 is included below.

Recommendation 1

The purpose of this recommendation is to make a 'pull test' with the power brake released a requirement when leaving wagons on their handbrake regardless of whether the driver is on his own or is working with a shunter.

Freight operators should ensure that their operating instructions include a 'pull test' when wagons are to be left to rely on their handbrakes for a time (DB Schenker reports that it has already taken this action).

Previously reported

2. We consulted RAIB on non-implementation of this recommendation explaining that Freight Operating Companies had provided reasons for the non-inclusion of the of the 'brake pull test' in their operating instructions but they had taken alternative actions to address the risk of wagons rolling away.

3. RAIB responded with the reasoning included at Annex B. ORR has been liaising with, and discussed the RAIB view, with the rail freight operators.

Update

This recommendation has been discussed on a number of occasions at Rail Freight Operations Group (RFOG) meetings and at the National Freight Safety Group (NFSG) meeting on 11 October 2013.

On 25 November 2013, ORR received the following information from the Chairman of the NFSG on behalf of all the freight operating companies:

The recommendation was discussed in detail at the RFOG. The group concluded that the freight operator's current actions in respect of this issue, meets the test of 'reasonable practicability', and that it would not be appropriate to implement the recommendation.

RFOG subsequently advised NFSG of its conclusions. These were debated, supported and endorsed by members of NFSG at its meeting on 11 October 2013. The following sets out the reasoning behind the decision:

At the majority of locations where wagons are stabled, there are alternative control measures in situ in order to mitigate against a runaway vehicle or vehicles, an example being trap points.

A number of operators are moving to the use of scotches to secure vehicles – a position supported by ORR – and adoption of the recommendation may lead to confusion for staff as

to which locations require a pull test when handbrakes are in use and where this is not applicable as scotches are in use.

The introduction of the ECM process has brought a renewed focus to wagon maintenance, and the incidence of poorly maintained brakes is likely to decrease. In addition pull tests may in themselves be detrimental to wagon components over repeated applications.

Given the range of locomotive types, powers and the lengths of stabled trains, a pull test would not be an effective test with a very powerful locomotive or where there are short rakes of wagons i.e. the test is not a universal or dependable indication of the ability of the applied handbrakes to secure the stabled vehicles.

ORR decision

Following consultation with RAIB, ORR consequently engaged further with the freight operating companies through industry bodies. Having considered the most recent response from the Chairman of the National Freight Safety Group, ORR is in agreement that the reasons put forward for non-implementation of this recommendation are sound. A pull test cannot be applied with universal success and therefore a blanket requirement would not be workable

Status: Non-implementation

RAIB consideration of non-implementation

As you aware, this recommendation was designed to mitigate the risk that handbrakes that have been applied to secure wagons are ineffective. It proposes that for those cases where wagons are to be left for some time, freight operators mandate that a 'pull test' be carried out.

Most freight operators have argued that mandating this approach will add complexity, time and cost to their operations. For many types of wagons, this appears to be an exaggeration given that the process as laid down in the Ashburys report envisages the use of the locomotive to release the train brake prior to applying the handbrakes (in line with the mandatory procedure laid down in Railway Group Standard GO/RT3056/E). However, the RAIB recognises that certain types of wagon have an interlock which will have the effect of applying the train brake when the hand brake is applied. We agree that the presence of one or more of this type of wagon within the portion of the train that is to have handbrakes applied, would necessitate someone walking the entire length of the train to manually release air from the distributors. It is therefore true that the presence of interlocked handbrakes will increase the time it takes to prepare the train to carry out a 'pull test' as described in the Ashbury's report.

The fact remains that, where wagons are to be left unattended and reliant on the handbrakes, a suitable risk mitigation measure should be put in place. The need for this is reinforced by recent incidents in which the application of multiple handbrakes failed to prevent a runaway due to poor adjustment and maintenance (Ashburys and Trafford Park). We are therefore still of the view that in many cases a simple 'pull test' (as described in the DBS procedure for detaching a locomotive from a train when no shunter is present) will often be an effective way of checking that the handbrakes are operative. This does not preclude the adoption of alternative measures, such as scotches.

It is clear that our recommendation is only meant to apply to those cases where wagons are reliant on their handbrakes ("freight operators should ensure that their operating instructions include a 'pull test' when wagons are to be left to rely on their handbrakes"). For this reason, we consider that it should be implemented unless it can be shown that one or both of the following statements apply:

- freight operators have totally overcome the need to rely on handbrakes; or
- freight operators are able to demonstrate that their handbrakes are adjusted and maintained such that a high level reliability is achieved, and freight operators are able to demonstrate that the risk of staff not fully applying handbrakes is very low.

Given the above, we urge that ORR consider again its proposal to accept non-implementation of Ashbury's recommendation 1. Instead, we propose that a suitable forum be convened to discuss the intent of the recommendation and the technical issues that surround it. Such a forum could be arranged by the ORR or alternatively through the auspices of the Rail Freight Operators Group. We would be happy to attend to present our evidence and our reasoning.