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18 July 2014

Ms Carolyn Griffiths  
Chief Inspector of Rail Accidents  
Rail Accident Investigation Branch  
Cullen House  
Berkshire Copse Road  
Aldershot GU11 2HP

Dear Carolyn

**RAIB report: Boiler incident on the Kirklees Light Railway**

I write to report on the consideration given and actions taken in respect of recommendation 1 of the above report which was addressed to ORR when the report was published on 13 March 2012.

The annex to this letter provides details of the consideration given and actions taken in respect of the recommendation where recommendation 1 has been implemented.

We do not intend to take any further action in relation to this recommendation.

Yours Sincerely

Chris O'Doherty

1. When we wrote to you on 17 July 2012, we reported that Kirklees Light Railway was taking action to address recommendation 1. The information below provides an update on the actions taken to date to implement the recommendation.

### **Recommendation 1**

Kirklees Light Railway should, within a timescale agreed with the Office of Rail Regulation, complete and fully implement a safety management system that is comparable with good practice in the heritage sector, and relevant standards and guidance. This should include the identification of risks, determination of safety critical elements of competence and the training and assessment to deliver it. The Kirklees Light Railway should confirm that the recently-introduced training syllabus and competency arrangements are consistent with this.

### **Previously reported**

2. We previously reported that Kirklees Light Railway was taking the following actions:

- *Produce Responsible Officer Specification;*
- *Written Examinations for Rules, Diesel Driver, Guards and Trackside Worker;*
- *Practical Examinations for General Manager and Operations Manager;*
- *Risk Assessments – Bulk completed within 6 months of the date of this letter and ongoing as required;*
- *Safety Management System – Completed within 6 months of the date of this letter and ongoing amendment as required.*

### **Update**

3. On 25 April 2014 Kirklees Light Railway provided the information below:

*We have been working through our risk assessments to ensure there are numeric values for the initial risk and mitigation. Greater focus has been placed on preparing those relevant to the operation of the railway in the first instance.*

*In terms of competency we have examined each personnel file we hold to ensure that any gaps present in the assessment are filled. All staff that go line side have completed a Rules and Regulation Assessment if they had not completed one in the last three years. Steam drivers who have not completed any form of theory examination have also been required to take the Steam Traction Theory test. We are currently working our way through marking these and addressing any areas of concern that may have arisen through these assessments. We are developing a bank of questions to ensure that the answers to the test do not become common knowledge for the future. We have settled on a period of three years between reassessment and we have updated the SMS to reflect this. We have approached a number of organisations to arrange medical assessment for the locomotive drivers. Sadly we have been unable to piggy back on to another railways scheme. An approach has been made to the Doctors on Wheels organisation which specialises in HGV medicals and we are still awaiting the outcome of this.*

*For the carriage fleet the annual inspection sheet has been amended to ensure items such as the door catches are checked as part of this work. Furthermore a 6 monthly intermediate inspection has been produced and this will be implemented over the next year. The annual inspections are due imminently.*

*An annual inspection standard has been produced for the steam and diesel locomotives. Both of these standards include a twenty point test criteria with an emphasis been placed on noting and recording measurements. A standard is been produced stating what the minimum and maximum permitted measurements are and this will be used in conjunction with the annual inspection sheets.*

*While we have used a standard wheel profile, as per a general arrangement drawing, for some years that has been applied with an allowance of up to 3mm of wear. We are now using a set profile which has been made to ensure uniformity across the wheels that are in use.*

*In addition to the points outlined above we have implemented a number of other points. This includes the introduction of a train register and some amendments to the daily inspection sheets for the locomotives. The Permanent Way standard has been completely revised to include greater numeric information and a defined axle load for 30 lb per yard rail. Furthermore considerable work is been undertaken on our rulebook based on some of the suggestions made by ORR.*

#### **ORR decision**

4. We can confirm that Kirklees Light Railway has implemented a Safety Management System that is comparable with good practice in the heritage sector with relevant standards and guidance. Risks have been identified and risk assessments are on-going. Safety critical elements of competence have been determined and training and assessment is in place to deliver it.

5. After reviewing all the information received from Kirklees Light Railway ORR concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, Kirklees Light Railway has:

- taken the recommendation into consideration; and
- has taken action to implement it.

**Status: Implemented**