



OFFICE OF RAIL REGULATION

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Carolyn Griffiths
Chief Inspector of accidents
RAIB
Cullen House
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Hampshire
GU11 2HP

Dear Carolyn

RAIB Report: Accident involving a pantograph and the overhead line near Littleport, Cambridgeshire

I write to update you on the consideration given and action taken in respect of the recommendations addressed to ORR in the above report, published on 20 May 2013.

Annex A to this letter provides details of the consideration given/action taken in respect of each recommendation where recommendations 1 and 2 are classed as 'implementation on-going'.

We will confirm when all actions have been completed. We expect to publish this response on the ORR website on 15 October 2014.

Yours Sincerely

Chris O'Doherty

Recommendation 1

The intention of this recommendation is to ensure that the risks associated with the authorisation of Temporary Non-Compliance certificates are properly assessed, and that appropriate mitigation is implemented.

Network Rail should review the manner in which Temporary Non-Compliance certificates (TNCs) are being used in relation to overhead line equipment, and take corrective action if they are being issued without risks being adequately assessed and mitigated.

Previously reported

1. On 15 May 2014 we reported that Network Rail had undertaken a review of NR/L2/ELP/21087 as part of the Risk Based Maintenance (RBM) programme. As a result of the concerns highlighted, the process had been strengthened with 10 separate flow charts. However, we did not understand how the process would actually be implemented.

Update

2. The additional information below was provided by Network Rail on 29 July 2014:

The methodology will be issued as new standards or a Letter of Instruction against NR/L2/ELP/21087 by October 2014 prior to the publication of the Electrification Business Critical Rules programme.

A draft document has been circulated for stakeholder review, and is now in the process of being updated. These derogations will be managed through to completion under the current standards regime using the processes defined in NR/L2/EBM/STP0001. It should be noted that NR/L2/EBM/STP0001 is due to be reviewed in the near future under Network Rail's Business Critical Rules Programme, however, Network Rail will ensure that any revised standards developed from this programme adequately define the processes required to manage any TNCs issued.

Maintenance engineers will be required to enter each wire run individually into tracker, and the tracker number will be recorded on the risk assessment form, if the deferral is accepted. The initial request for a year extension will be reviewed by the RAM, any derogations over a year will require agreement by both the RAM and Professional Head. All risk control flow charts will have a clear risk assessment form, or an explanation why this is not necessary (i.e. the fault is serious and the priority should be to fix the fault).

ORR decision

After reviewing all the information received from Network Rail, ORR 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 October 2014.

ORR will write to RAIB again if it becomes aware that the information above is inaccurate.

Status: Implementation on-going. We will confirm in December 2014 that all actions are complete.

Recommendation 2

The intent of this recommendation is to provide maintenance personnel who are required to check alignment of the overhead line equipment with information that is in a format that can be easily used, and is appropriate for their level of competence.

Network Rail should review the standards and procedures for the management of overhead line alignment in order to provide maintenance staff with a simple means of relating measurements that are recorded at site to required alignment criteria. The review should include, at least, consideration of:

- providing maintenance staff with information allowing them to determine the acceptable range of contact wire positions at every support; and
- removing the need for maintenance staff to make their own assessment of pantograph movements when determining if adjustments to the overhead line are required.

Previously reported

We previously reported that Network Rail had undertaken a review of the standards and procedures for management of overhead line alignment and the review had identified 3 actions for a new methodology.

Update

The additional information below was provided by Network Rail on 29 July 2014:

The new methodology for height and stagger analysis will be based on static OLE geometry. This will provide a less complex method of assessment and will allow maintenance staff to clearly identify when intervention is required. Detail of this will be contained within a new company standard, before being migrated into the business critical rule framework in the future.

The basis of the analysis will be that technical staff will measure the static contact wire geometry relationship with the track, prior to programmed maintenance of the OLE, assess the geometry and then issue the maintenance staff with alterations to bring the OLE geometry within OLE design range parameters.

A minimum action code will also be included within a standard. The severity of the defect will determine the timeliness of the response. This will remove the need for maintenance staff to make their own assessment.

Ideally, the OLE geometry should be reset to the original design. Where this is no longer possible, it is necessary for the equipment to be reset with the basic OLE design range parameters. This will be published in a second standard / BCR for the majority of OLE design ranges. These two standards are scheduled to be published by March 2015.

It is recognised that OLE geometry can be modified by track geometry changes. This standard will make it clear that an OLE design review is required to be undertaken when track geometry changes are planned by a competent OLE designer. A competency and training programme for this work stream will be developed and published in March 2015.

ORR decision

After reviewing all the information received from Network Rail, ORR 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 March 2015.

Status: Implementation on-going. We will confirm in April 2015 that all actions are complete