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5 February 2021

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

Dear Andrew,

RAIB Report: Runaway locomotive at Beddgelert, North Wales on 16 April 2019

I write to report¹ on the consideration given and action taken in respect of the recommendations addressed to ORR in the above report, published on 6 February 2020.

The annex to this letter provides details of actions taken in response to the recommendations and the status decided by ORR. The status of recommendations 1, 2 & 4 is '**Implemented**'. The status of recommendation 3 is '**Progressing**'.

ORR will advise RAIB when further information is available regarding actions being taken to address these recommendations.

We will publish this response on the ORR website on 8 February 2021.

Yours sincerely,



Oliver Stewart

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

Initial consideration by ORR

1. All 4 recommendations were addressed to ORR when the report was published on 6 February 2020.
2. After considering the recommendations ORR passed recommendations 1, 2 & 3 to Festiniog Railway Company and recommendation 4 to the Heritage Railway Association asking them to consider and where appropriate act upon them and advise ORR of its conclusions. The consideration given to each recommendation is included below.
3. This annex identifies the correspondence with end implementers on which ORR's decision has been based.

Recommendation 1

The intent of this recommendation is that the Festiniog Railway Company should improve the way that it manages engineering changes to its assets, thoroughly consider the risks involved and preserve knowledge of any changes for the future of the railway.

Festiniog Railway Company should develop and implement a robust engineering change management process encompassing all rolling stock and locomotives

ORR decision

4. The Ffestiniog Railway Company (FRC) have introduced a safety verification and management of change progress log, which is discussed at the monthly safety management meeting.
5. Having reviewed the documentation and clarified a couple of points with FRC around recording of the decision making process, we consider that the change management process has been improved and therefore the recommendation has been implemented.
6. After reviewing the information provided ORR has concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, The FRC has:
 - taken the recommendation into consideration; and
 - has taken action to implement it

Status: Implemented.

Information in support of ORR decision

7. On 30 September 2020 Festiniog Railway Company provided the following initial response:

We have reviewed and updated our change management policy SM POL 035 to give greater clarification to workshop staff regarding what can be changed without reference to the Chief Mechanical Engineer or Works management. Staff have been briefed on the changes by means of tool box talks.

Since September 2019, change management has been a standing item on the agenda on the monthly Safety Management meeting. A register of projects requiring approval has been created, and progress in achieving approval is reported to, and discussed at, the monthly Safety Management meeting. This register is also reviewed by the Engineering & Safety Director on a regular basis.

8. On 1 February 2021, FRC provided the following update:

*Recommendation 1 – cross referencing of drawing and documents
I attach an example of a recently approved change management document, complete with cross references to drawings. These documents, together with the associated risk assessment, are uploaded to our SMS as can be seen from the attached screen grab. Engineering drawings include version numbers on the drawing itself, and in the file metadata in our document management system.*



SM ECJ 003 NGG16
cowcatchers change



Ff&WHR screen
shot.docx

Recommendation 2

The intent of this recommendation is that the maintenance of brakes and other safety critical systems on FRC's rolling stock is adequately controlled.

Festiniog Railway Company should systematically review how it monitors, assures and records the inspection and maintenance of brakes and other safety critical systems on its rolling stock and locomotives, and implement measures to address any shortcomings found

ORR decision

9. FRC reviewed its existing system of recording and conducting assurance of inspection and maintenance work and has issued new inspection checklist documents.

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

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

Status: Implemented.

Information in support of ORR decision

11. On 30 September 2020 Festiniog Railway Company provided the following initial response:

The existing locomotive maintenance policy has served us well for a good number of years, but the failure of an individual fitter to complete paperwork is regrettable.

Instructions regarding the correct completion of inspection paperwork have been reissued to those staff carrying out inspections.

EN POL 011 "Loco Maintenance" has been reviewed and extensively updated. The inspection checklist pro-forma for locos have all been reviewed and updated.

EN POL 014 "Carriage & Waggon Maintenance" has been reviewed and updated. The pro-forma for carriage running gear inspections has been reviewed and updated.

The intended programme of internal audits of loco logbooks and carriage inspection records by the Works Manager and Safety Manager was halted by the suspension of services due to the Covid-19 lockdown and staff being furloughed. An audit was carried out by the Safety Manager two weeks after the resumption of a Covid secure train service in July, and all log books and carriage inspections were correctly completed. A further sample of log books/carriage records was viewed in early September and were all completed correctly. The planned programme of audits will resume fully once staff return from furlough.

Recommendation 3

The intent of this recommendation is that Festiniog Railway Company makes use of the 'deadman' systems on its locomotives, where fitted.

Festiniog Railway Company should review its lone working arrangements, and its policy relating to the use of 'deadman' systems, where fitted, for situations where trains are being driven by an unaccompanied person. It should update its rulebook to take account of any changes

ORR decision

12. The use of the DSD is a standing instruction issued to drivers by FRC, but is not mandated as part of the rule book. We are reviewing the adequacy of FRC procedure, as they have not explicitly defined use of the DSD during engineers' possessions, operation of light engines or when a train is single manned with no passengers on the running line.

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

- taken the recommendation into consideration; and
- is taking action to implement it

Status: Progressing. ORR will advise RAIB when further information is available regarding actions being taken to address this recommendation.

Information in support of ORR decision

14. On 30 September 2020 Festiniog Railway Company provided the following initial response:

Use of the DSD is not mandated as part of the rule book, but as a standing instruction to drivers. A reminder of the instruction has been issued by the Loco Manager via roster emails and the HOPS database. Driver training and assessment on locos fitted with DSD emphasizes the requirements for its use, and testing and use is part of the pre-use inspection and preparation for which drivers sign.

15. On 1 February 2021, FRC provided the following update:

I can confirm that diesel locos operating on the main line on passenger trains, or when passenger trains are operating, will either have a functioning DSD or be double manned. The standing instruction on this will be incorporated in the next update of our rule book. Engineering trains operating when passenger trains are not running may be single manned as we consider the mitigation outlined in our risk assessment SM RAS 103 (copy attached) adequately controls the risk.



SM RAS 103 single
manned diesels A02

Recommendation 4

The intent of this recommendation is that the safety learning identified in this report is thoroughly shared amongst the heritage railway industry.

The Heritage Railway Association should bring the safety learning in this report to the attention of its members and the wider heritage railway industry, highlighting the importance of evaluating and risk assessing engineering changes made to assets, using suitable processes to maintain safety critical systems and thoroughly investigating the factors that underlie accidents and incidents

ORR decision

16. The Heritage Railway Association (HRA) has publicised the findings of the RAIB report to its members by means of an entry in the *Operation & Safety Matters* bulletin.

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

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

Status: Implemented.

Information in support of ORR decision

18. On 11 June 2020 the Heritage Railway Association provided the following initial response:

The HRA formally accept the recommendation in the report and have included this report in the latest edition of our special newsletter, "O&S Matters", a copy of which I attach for your reference as:



O&S Matters 26
June 2020-S .pdf

You will note the specific reference as the last item on the second page.

The document is in the process of being mounted on our website and will also be dispatched directly to our operating railway contacts with an appropriate covering note.