

Oliver Stewart
Senior Executive, RAIB Relationship and
Recommendation Handling

Telephone 020 7282 3864

E-mail oliver.stewart@orr.gsi.gov.uk

26 April 2017



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

Dear Andrew,

RAIB Report: Near-miss at Llandoverly level crossing, Carmarthenshire, 6 June 2013

I write to provide an update¹ on the action taken in respect of recommendation 3 addressed to ORR in the above report, published on 15 May 2014.

The annex to this letter provides details of the action taken regarding this recommendation, the status of which is now '**Implemented**'. We do not propose to take any further action in respect of this recommendation, unless we become aware that any of the information provided becomes inaccurate, in which case I will write to you again.

We will publish this response on the ORR website on 27 April 2017.

Yours sincerely,

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

Oliver Stewart

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

Recommendation 3

The intent of this recommendation is for infrastructure upgrade and improvement projects to include explicit consideration of all reasonable opportunities to improve safety at those locations where work is taking place.

Network Rail should make improvements to its processes for the design of new and altered signalling, to require the active consideration of reasonable opportunities to make improvements (for example, the types of measures indicated in NB 130 (paragraph 75)) to the control of risk beyond the immediate scope of the proposed works, including identifying where operator errors, individual or collective, could lead to unsafe conditions (paragraph 106c).

ORR decision

1. Network Rail have revised and consolidated the relevant standards for renewing or upgrading any part of a signalling system, so that staff responsible for specifying the work are obliged to consider if there is a reasonable opportunity to improve risk controls at the same time by adopting modern standards and practices, whilst considering the need for a consistent and predictable presentation to the end users.
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
 - has taken action to implement it.

Status: Implemented.

Previously reported to RAIB

3. On 14 August 2014, Network Rail provided the following information:

Network Rail will update and improve the Signalling Design Handbook NR/L2/SIG/11201 to include requirements of NB130 on taking reasonable opportunities to make improvements to the control of risk beyond the immediate scope of the proposed works, including identifying where operator errors, individual or collective, could lead to unsafe conditions. The standard will be issued as part of the December 2014 issue of standards.

Timescale: 31 January 2015

4. On 26 September 2014, ORR wrote to Network Rail requesting an update. On 16 February 2015, Network Rail provided an update stating that:

Creation of a new standards module for the 'Signalling Design Handbook' (SDH) has been delayed due to resource constraints.

In the interim Signalling Asset Policy (section 10.3) states that ‘reasonable opportunity will be taken to address safety issues’ will be taken when assets are renewed or altered. This policy is supported by the ‘Safe by Design’ initiative and various guidance documentation exists in the form of NB123, NB130 and PAN040. All of these have been issued and should be worked to when specifying and implementing signalling work. These give various levels of guidance on what is considered as ‘Taking Reasonable Opportunity’ when specifying and implementing alterations or renewals to signalling systems.

The documents mentioned above will all be used as the basis of the proposed new module for the SDH. Current expected issue date for the new SDH module is 31 October 2015.

Update

5. On 2 September 2016 Network Rail a closure statement containing the following information:

The instructions for assessment of reasonable opportunity when considering signalling renewals and alterations were published in disparate elements of NB123, IP PAN 041 and NR/L2/SIG/30009 Module E810 version 1. The action taken was to collate the instructions and to expand the scope statements to include a wider range of planned work in NR/L2/SIG/30009 Module E810 version 2, published in June 2016.

The intent of this recommendation has been specifically addressed by the revision to NR/L2/SIG/30009 Module E810 with the scope statement as follows:-

- *All staff responsible for remitting or specifying works to the signalling system have an obligation to consider the ‘reasonable opportunity’ available for providing risk control measures as part of the works.*

This module applies to ALL changes to the signalling system; including control systems, interlockings, trackside equipment, layout, functionality and trackside apparatus housings.

This measure is aimed at addressing risk of those responsible for defining the scope of works and limiting the scope to an extent that reasonable opportunity is not taken. The revised wording places clear responsibility on the specifier to consider reasonable changes, at the inception of the design process of new and altered signalling.

Further clarity is given to the work types covered by NR/L2/SIG/30009 Module E810, with expansion to specifically include level crossings, as follows:-

- *6 Requirements*

6.1 Introduction

When re-signalling, relocking, re-platforming and re-controlling signalling systems and remodelling layouts and level crossings there is an opportunity to

reduce risk by adopting modern standards and practices whilst considering the need for a consistent and predictable presentation to the end users.

The extent of application of current standards is to be based upon the reasonable opportunity for improvement and the practicability of the change for each particular scheme.

Current signalling principles and standards shall be applied when alterations are made to signalling systems unless reasoned justification is made for retaining the existing arrangements.

Reasoned justification shall be applied to the geographical area of alteration and at its fringes. Reasonable opportunity shall be taken to improve safety at the fringe.

The previous instructions in NR/L2/SIG/30009 Module E810 version 1, was specifically aimed at interlocking renewals where the layout was unchanged, and the revisions in version 2 widens the scope and requirements, and defines that documented assessment in accordance with CSM practice is undertaken, which provides reasoned judgement for omission of risk reduction measures.