

FTA

FEDERAL TRANSIT ADMINISTRATION

2016 SSO Program Workshop

49 CFR Part 674 Certification Overseeing Hazard Management and Corrective Action Plans

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Overview

- Background
- Part 674 Requirements and Certification Guidance
 - Hazard and Risk Management
 - Corrective Action Plan (CAP) Development
 - CAP Approval
 - CAP Tracking
 - CAP Closeout
 - CAPs from NTSB Investigation

Hazard and Risk Management Regulations

49 CFR Part 674.29(b):

- The SSOA must determine, specifically, whether the Public Transportation Agency Safety Plan sets forth a sufficiently explicit process for safety risk management, with adequate means of risk mitigation for the RTAs

49 CFR Part 674.37(a):

- In any instance in which the RTAs must develop and carry out a CAP the SSOA must ensure that the CAP describes, specifically, the actions the RTAs will take to minimize, control, correct, or eliminate the risks and hazards identified by the CAP

Hazard and Risk Management: Certification Guidance

- CAPs to address the risks and hazards
 - Hazard and risk management process to be explicitly specified and approved
 - Identification of safety hazards
 - Evaluation/analysis of hazards
 - Determine mitigations
 - Identify CAPs
- To be expanded upon release of the Agency Safety Plan rule (Part 673)

CAP Process: Regulations

49 CFR Part 674.27(8):

- The program standard must explain the process and criteria by which the SSO agency may order an RTA to develop and carry out a Corrective Action Plan (CAP), and
- a procedure for the SSO agency to review and approve a CAP
- Also, the program standard must explain the SSO agency's policy and practice for tracking and verifying an RTA's compliance with the CAP, and
- Managing any conflicts between the SSOA and RTA relating either to the development or execution of the CAP or the findings of an investigation

CAP Development: Regulations

49 CFR Part 674.37(a):

- In any instance in which an RTA must develop and carry out a CAP the SSOA must:
 - Review and approve the CAP before the RTA carries out the plan;
 - However, an exception may be made for immediate or emergency corrective actions that must be taken to ensure immediate safety, provided that the SSOA has been given timely notification, and the SSOA provides subsequent review and approval
 - A CAP must describe, specifically, the actions the RTA will take to minimize, control, correct, or eliminate the risks and hazards identified by the CAP
 - The schedule for taking those actions, and
 - The individuals responsible for taking those actions

CAP Development Process: Certification Guidance

- CAP Development Process
 - CAP sources (Identification)
 - CAP Notification (Emergency and non-emergency)
 - Required CAP elements (Schedule, Responsible Party)

CAP Approval Process: Certification Guidance

- CAP Approval Process
 - Timeline for CAP submission and review
 - Process for CAP review and response
 - Responsible party(ies)
 - Expectations for RTAs incorporation of SSO comments and concerns
 - Policy or procedures for resolving disputes

CAP Tracking Process: Certification Guidance

- CAP Tracking
 - SSO agency CAP tracking database
 - Open CAP review schedule and process
 - Coordination meetings
 - Process for RTAs submission towards CAP closure
 - Onsite progress review/inspection

CAP Closeout Process: Certification Guidance

- CAP Closeout
 - Required documentation, such as:
 - SSOA inspections
 - Work orders
 - Training records
 - Independent assessment
 - Onsite verification

CAPs From NTSB Investigations: Regulations

49 CFR Part 674.37(b):

- In any instance in which a safety event on the RTA's rail fixed guideway public transportation system is the subject of an investigation by the NTSB, the SSO must:
 - Evaluate whether the findings or recommendations by the NTSB require a CAP by the RTA, and
 - If so, the SSOA must order the RTA to develop and carry out a CAP

CAPs from NTSB Investigations: Certification Guidance

- Program Standard or Procedure to specify:
 - Evaluation of NTSB finding or recommendation such as
 - SSOA review of NTSB recommendation
 - Hazard analysis conducted by RTA and approved by SSOA
 - Independent assessment
 - Identification and resolution of CAP resulting from NTSB recommendation

Questions?

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