



U.S. Department
of Transportation
**Federal Transit
Administration**

Headquarters

1200 New Jersey Avenue, SE
Washington, DC 20590

Mr. Paul Wiedefeld
General Manager and Chief Executive Officer
Washington Metropolitan Area Transit Authority
600 Fifth Street, NW
Washington, DC 20001

Subject: Final Approval of Special Directive 18-2 Corrective Action Plans

Dear Mr. Wiedefeld:

On January 19, 2018, the Federal Transit Administration (FTA) issued Special Directive 18-2 to require the Washington Metropolitan Area Transit Authority (WMATA) to address findings identified by the Tri-State Oversight Committee (TOC) as part of its implementation of the scheduled triennial review process required by 49 CFR Part 659. WMATA submitted its final revision for proposed Corrective Action Plans (CAPs) to implement FTA's required actions on April 20, 2018.

The FTA reviewed WMATA's proposed 21 CAPs, and they adequately address the 21 findings and 24 required actions as described in Special Directive 18-2. FTA approves these CAPs for WMATA's implementation and appreciates your efforts to enhance Metrorail's safety performance.

Thank you for your commitment to implementing all of the actions as described in each of these CAPs and ensuring that WMATA meets the time commitments established in the CAPs. Please contact me at (202) 366-5303 or via email at Jamie.Pfister@dot.gov with any questions.

Sincerely,

**JAMIE DURHAM
PFISTER**

Jamie Pfister
Director, FTA WMATA Safety Oversight

Digitally signed by JAMIE DURHAM PFISTER
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ou=DOT Headquarters, cn=JAMIE
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Date: 2018.05.21 13:45:35 -04'00'

Enclosure: Special Directive 18-2 Corrective Action Plan Table

cc: Joseph Leader, Chief Operating Officer, WMATA
Andrew Off, Assistant General Manager for Rail Services, WMATA
Patrick Lavin, Chief Safety Officer, WMATA

Mr. Paul Wiedefeld

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Eric Christensen, Chief of Internal Compliance, WMATA

Angel Peña, Managing Director, Quality Assurance, Internal Compliance & Oversight,
WMATA

Sharmila Samarasinghe, Chair, Tri-State Oversight Committee



Accepted Corrective Action Plan (CAP) Responses				
Category	Finding	WMATA Required Action	ID	Due Date ¹
Fitness for Duty and Hours of Service Program	The WMATA does not consistently implement post-accident drug and alcohol testing.	The WMATA must ensure that employees are sent for post-accident testing in compliance with FTA Drug and Alcohol Testing Program requirements.	FTA-TSR-18-001	08/28/2019
Fitness for Duty and Hours of Service Program	The WMATA does not consistently implement its hours of service requirements.	FTA-TSR-18-002-a ² : The WMATA must ensure that personnel covered by its hours of service requirements and their supervisors are trained on, and adhere to, these requirements. FTA-TSR-18-002-b: The WMATA must ensure that all departments consistently implement hours of service requirements among their covered employees. FTA-TSR-18-002-c: The WMATA must conduct annual hours of service audits on all safety sensitive departments.	FTA-TSR-18-002	04/17/2020

¹ WMATA established these due dates in its March 19, 2017 submission.

² In two cases (FTA-TSR-18-002 and FTA-TSR-18-019), WMATA combined two or more required actions into one CAP.



Accepted Corrective Action Plan (CAP) Responses

Category	Finding	WMATA Required Action	ID	Due Date¹
Hazard Management, Accident Investigation, and Data Collection and Analysis	The WMATA does not consistently implement its Hazard Management Procedure.	The WMATA must evaluate the efficacy of its current Hazard Management Procedure, and revise, as appropriate, to ensure that hazards are identified and resolved.	FTA-TSR-18-003	07/28/2019
Hazard Management, Accident Investigation, and Data Collection and Analysis	The WMATA does not consistently implement its Safety Measurement System as described in Section 9 of its System Safety Program Plan.	The WMATA must ensure that all Metrorail incidents are entered into the Safety Measurement System according to the required timeframes.	FTA-TSR-18-004	07/29/2020
System Modification, Safety Certification, Configuration Management, and Procurement	The Department of System Safety and Environmental Management's engineering modification instruction review processes are not documented in an internal procedure.	The WMATA must document the process used by the Department of System Safety and Environmental Management to review Engineering Modification Instructions.	FTA-TSR-18-005	07/29/2020



Accepted Corrective Action Plan (CAP) Responses				
Category	Finding	WMATA Required Action	ID	Due Date ¹
System Modification, Safety Certification, Configuration Management, and Procurement	The Department of System Safety and Environmental Management (SAFE) does not follow Safety and Security Certification Plan Section 3.3.1, which requires SAFE approval of daily certification testing plans prior to revenue operation after contractors perform work on track or automatic train control components.	The WMATA must evaluate its current requirements to approve daily certification testing plans developed by contractors prior to placing track and automatic train control components in revenue operations, and revise, as appropriate, to ensure the performance of this activity.	FTA-TSR-18-006	10/30/2019
Roadway Worker Protection	The WMATA Roadway Worker Protection (RWP) Committee lacks a detailed charter and clearly defined procedures for managing updates and changes to RWP requirements.	The WMATA must develop the RWP Committee's charter, which must include procedures for managing updates and changes to the RWP requirements.	FTA-TSR-18-007	01/30/2019
Roadway Worker Protection	The Office of Technical Skills and Maintenance Training's roadway worker protection instructors lack practical on-the-job experience.	The WMATA must ensure instructors participate in mandatory field days and familiarization training and establish a process for auditing roadway worker protection training consistency and quality.	FTA-TSR-18-008	07/03/2019



Accepted Corrective Action Plan (CAP) Responses

Category	Finding	WMATA Required Action	ID	Due Date¹
Roadway Worker Protection	The Department of System Safety and Environmental Management does not conduct the biannual independent audit of Roadway Worker Protection (RWP) described in Section 3.3 of the RWP Training Standard Operating Procedure. Also, WMATA's Technical Skills and Maintenance Training Supervisors do not always complete the required checklists and reviews and regarding RWP set-up and field compliance.	The WMATA must conduct a program of independent audits and ensure RWP program implementation in conformance with WMATA's rules and standard operating procedures.	FTA-TSR-18-009	07/29/2020
Roadway Worker Protection	The Roadway Worker Protection (RWP) Manual, the RWP training program, the Metrorail Safety Rules and Procedures Handbook, and the System Safety Program Plan provide inconsistent RWP-related information.	The WMATA must resolve inconsistencies in its RWP program documentation and training program.	FTA-TSR-18-010	07/31/2019



Accepted Corrective Action Plan (CAP) Responses				
Category	Finding	WMATA Required Action	ID	Due Date ¹
Roadway Worker Protection	The process used by WMATA's Human Resources for detailing the Roadway Worker Protection (RWP) certification level required for specific job duties is unclear, and no WMATA department maintains a master list or reference showing all descriptions with associated RWP certification level requirements.	The WMATA must establish RWP certification level requirements for all applicable Metrorail job descriptions and maintain a master list of these RWP certification requirements.	FTA-TSR-18-011	06/27/2018
Roadway Worker Protection	Training material is not always updated in a timely manner to reflect Permanent Orders and other rule changes, and the Office of Technical Skills and Maintenance Training does not maintain a log of rule changes not yet incorporated into training materials.	The WMATA must document its process for identifying and communicating new Permanent Orders, rule changes, and other related actions that affect the roadway worker protection (RWP) program to RWP training instructors, and must ensure that copies of new Permanent Orders and rule changes are available for WMATA employees in RWP training.	FTA-TSR-18-012	06/20/2018



Accepted Corrective Action Plan (CAP) Responses				
Category	Finding	WMATA Required Action	ID	Due Date¹
Roadway Worker Protection	Frontline employee Roadway Worker Protection (RWP) Manuals do not contain the most up-to-date rules, and there is no easily accessible location where all related RWP rules and documentation is located.	The WMATA must continue its activities to create a location on its Intranet, or other site accessible to all Metrorail employees, where updated versions of the RWP Manual and related RWP Temporary and Permanent Orders, bulletins, lessons learned, emails, Standard Operating Procedures, Operations Administrative Procedures, and any other related documentation are maintained.	FTA-TSR-18-013	03/18/2019
Roadway Worker Protection	Roadway Workers In Charge (RWIC) provide abbreviated, or incomplete job safety briefings which do not adequately address job and environmental hazards.	The WMATA must develop a guide for RWIC on how to conduct job safety briefings, manage good faith safety challenges, and make track authorization requests, and must train all Level 4 RWICs on how to use the guide. WMATA also must assess use and implementation of the guide by Level 4 RWICs.	FTA-TSR-18-014	07/24/2019



Accepted Corrective Action Plan (CAP) Responses				
Category	Finding	WMATA Required Action	ID	Due Date ¹
Roadway Worker Protection	Frontline personnel are largely unaware of maps showing radio dead spots in the Metrorail system.	The WMATA must issue an agency-wide bulletin, letter, memorandum, or other document explaining the availability of radio outage maps and how to access and read them.	FTA-TSR-18-015	04/25/2018 ³
Roadway Worker Protection	Road mechanics do not consistently follow Train Malfunction Standard Operating Procedure #34 to ensure that a train is immobilized and secured prior to working around it while on the right of way.	The WMATA must issue a bulletin, letter, memorandum, or other documents explaining the requirements to be followed by road mechanics to ensure that a train is immobilized and secured prior to working around it while on the right of way.	FTA-TSR-18-016	06/27/2018

³ WMATA has completed the work to address these findings and required actions; as such WMATA plans to submit required deliverables and a close-out request as soon as the CAP is approved by FTA. They will not be considered past-due as the CAP has not yet been approved.



Accepted Corrective Action Plan (CAP) Responses				
Category	Finding	WMATA Required Action	ID	Due Date ¹
Roadway Worker Protection	There are no procedures describing how Metro Transit Police Department Roadway Worker Protection (RPW) training and RWP training provided to contractors by the Department of System Safety and Environmental Management are structured and administered.	The WMATA must develop procedures describing how the Metro Transit Police Department's RWP training and the RWP training provided to contractors by the Department of System Safety and Environmental Management are structured and administered.	FTA-TSR-18-017	04/30/2018 ⁴
Roadway Worker Protection	Training materials delivered to Metro Transit Police Department officers do not specifically address their unique duties and exemptions.	The WMATA must ensure that Metro Transit Police Department training materials reflect their unique duties and exemptions as they relate to Roadway Worker Protection.	FTA-TSR-18-018	03/27/2019

⁴ WMATA has completed the work to address these findings and required actions; as such WMATA plans to submit required deliverables and a close-out request as soon as the CAP is approved by FTA. They will not be considered past-due as the CAP has not yet been approved.



Accepted Corrective Action Plan (CAP) Responses				
Category	Finding	WMATA Required Action	ID	Due Date¹
Elevator and Escalator Maintenance	The WMATA Division of Elevator/Escalator Services demonstrates a lack of consistent compliance with safety rules and requirements.	FTA-TSR-18-019-a: The WMATA must audit the Division of Elevator/Escalator Services' compliance with system, jurisdictional, Federal, and division safety rules and requirements and address the findings of that audit. FTA-TSR-18-019-b: The WMATA must conduct an analysis of the Division of Elevator/Escalator Services' safety rules and requirements to ensure the safety of the public and their technicians	FTA-TSR-18-019	04/24/2019
Elevator and Escalator Maintenance	The WMATA Division of Elevator/Escalator Services demonstrates a lack of consistent conformance with preventive maintenance procedures and requirements.	The WMATA must audit the Division of Elevator/Escalator Services' preventive maintenance procedures and requirements and its technicians' conformance with the same and address the findings of that audit.	FTA-TSR-18-020	06/26/2019
Maintenance Facility Safety and Equipment Inspections	Supervisors with the Office of Plant Maintenance do not consistently conduct two quality control audits of preventive maintenance activities as required by Standard Operating Procedure 209-07.	The WMATA must ensure that Office of Plant Maintenance supervisors consistently conduct quality control audits as required by Standard Operating Procedure 209-07.	FTA-TSR-18-021	01/30/2019