



National Transportation Safety Board

Washington, D. C. 20594

Safety Recommendation

Log R-604

Date: August 9, 1988

In reply refer to: R-88-23 through -33

Honorable John C. Riley
Administrator
Federal Railroad Administration
Washington, D.C. 20590

In 1987, the National Transportation Safety Board undertook a safety study to review the first full year of implementation of the current Federal Railroad Administration's (FRA) alcohol and drug rule. Also, the Safety Board wanted to examine what actions beyond those required by the rule could be undertaken by the railroads and the Federal government to reduce high losses from accidents involving railroad employees in safety-sensitive positions who continue to use alcohol and/or drugs on the job ^{1/}

In 1987 and 1988, attention has been focused on accidents/incidents in which the use of alcohol and/or drugs by railroad employees has led to fatalities and serious injuries. The Safety Board's study reviewed the results of its accident investigation activities over the past 16 years (1972-87), all safety recommendations related to those accidents, and the responses of the organizations (public and private) to the Board's recommendations. Additionally, the Safety Board visited 10 railroads and interviewed more than 120 people directly involved in the railroad industry.

One of the Safety Board's principal concerns is the limited scope of the current FRA rule, particularly in terms of employees covered. In its comments of August 15, 1984, to the FRA on its then-proposed alcohol and drug rule, the Safety Board stated:

Although the Safety Board recognizes the difficulty of the task of defining railroad employees covered by this rule, it believes FRA should include any employee who may be directly involved in an accident. This means that employees other than "covered employees" under the Hours-of-Service Act need to be subject to testing. For example, if a seriously alcohol-impaired train crew reported to a supervisor who did not detect alcohol, there might be a need to test the supervisor to determine if his failure to evaluate the crew properly was due to his own impairment.

^{1/} For more detailed information, read Safety Study--*Alcohol/Drug Use and Its Impact on Railroad Safety* (NTSB/SS-88/04).

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Restricting the rule to "hours of service" employees alone limits the effectiveness of the rule. Particularly after an accident/incident, all railroad personnel who may have been involved should be subject to testing for alcohol and/or drugs.

However, the rule as it was issued in final form, applies only to employees assigned to perform service subject to the Hours of Service Act (45 U.S.C. 61-64b) during a duty tour. In general, the rule covers railroad operating employees (engineers, conductors, brakemen, firemen, and hostlers), signalmen, and dispatchers. Railroad employees not specifically covered by the rule include railroad officials and supervisors, maintenance-of-way employees, maintenance-of-equipment employees, clerks, and a number of specific labor craft employees generally located in terminal locations (electricians, machinists, and pipefitters).

During interviews with management and rail labor employees, the Safety Board discussed expansion of the rule to cover all employees in safety-sensitive positions. Management officials agreed that such an expansion is advisable. Rail labor employees, particularly engineers and conductors, also believed that the expansion of the rule to other labor crafts would be beneficial in improving the safety level on their railroads; most felt this would be a logical extension of the rule. Therefore, the Safety Board believes that all employees in safety-sensitive positions should be covered by an expanded FRA rule. The Safety Board regards the reasonable cause testing provisions of the FRA rule as the cornerstone of a meaningful alcohol/drug testing program and believes that all employees in safety-sensitive positions should be subject to mandatory reasonable cause testing provisions.

The Southern Pacific Transportation Company (SP) has an aggressive reasonable cause testing program covering all employees, not just those "covered" by the FRA rule. Since 1984, the SP has had a firm policy that alcohol and drugs have no place in its workforce. The major difference between SP's program and the programs of most other railroads is SP's broad "just cause/reasonable suspicion" testing policy which applies not only to hours-of-service (covered) employees but also to other safety-sensitive employees and is triggered by a wide range of safety-related rules violations or other serious infractions. The SP believes that a drug-impaired clerk who miscodes a hazardous materials-bearing trains may well compromise safety as much as a drug-impaired engineer.

The SP has reported its program is saving lives and reducing accident losses for the company. This is the only railroad of the 10 that were interviewed that could document its accident loss reduction as a result of its alcohol and drug initiatives. In 1983 (before the new alcohol and drug policy), SP experienced 911 human factors accidents resulting in damage losses of \$6.4 million. After 3 years under its new alcohol/drug program, human factors accidents dropped to 168, with a reduction to \$1.2 million in damages. During the first few months under its new testing program, 22 to 24 percent of crewmembers involved in human factors accidents were tested positive for drugs and alcohol. The incomplete 1987 results (at the time of the Safety Board's interview with SP management) indicated about 2.3 percent of crewmembers tested positive for drugs or alcohol and that human factors accidents would probably be about 120 for the year.

The SP reported that if it had limited the application of its alcohol/drug program to accidents/incidents covered by the FRA rule, relatively few employees would have been tested. In fact, only 24 "human factor" accidents in 1986 met the FRA reporting criteria, compared to the 168 recorded by the SP. ^{2/} The SP also reported that personal injury accidents under the FRA's criteria were 347 in 1986, compared to 821 by the SP's standard.

Some major accidents in 1987 met the mandatory postaccident testing criteria, i.e., exceeded the threshold damage requirement of \$500,000; however, the train crews were not tested. In these accidents, the resulting damage should have triggered testing but the railroad's damage estimate fell below the \$500,000 threshold damage requirement.

The mandatory testing aspect of the FRA rule is diluted because of several factors. First, the damage criterion of \$500,000 or more is much too high. The "good faith determination" language of the rule allows railroad officials to determine if an accident/incident falls in one of the reportable classes of the rule, using any valuation schedule the railroad chooses. Railroad officials use depreciated value of equipment as opposed to actual replacement cost; therefore, the cost of the accident is reported artificially low. Furthermore, the costs of the railroad accident should include railroad equipment replacement costs, the cost of loss of lading (which can be many hundreds of thousands, if not millions, of dollars), and reasonable estimates of other nonrailroad property losses.

On March 11, 1987, a Burlington Northern (BN) freight train near Glendive, Montana, derailed in a descending 3-degree curve while traveling about 45 mph. ^{3/} The railroad's initial estimate of the damage was simply "\$150,000 plus," and none of the traincrew was tested. However, the Safety Board initially estimated on-scene damage at \$611,000. (The Safety Board estimated final cost of the accident at \$655,000 which included railroad property damage of \$643,000 and wreck clearing costs of \$12,000.)

On October 3, 1987, a BN train, traveling at an estimated 58 mph, derailed in a curve about 1.5 miles east of Kenesaw, Nebraska. ^{4/} Twenty-six flat cars loaded with vans derailed, turned over, and were destroyed. Again, the BN initially estimated damage at "\$150,000 plus," and did no toxicological testing. The Safety Board initially estimated the damage to be about \$603,000; the final cost of the accident--accounting for damage to railroad property, loss of lading, and wreck clearing--was approximately \$785,000.

Because the FRA currently permits the railroads to use depreciated values to estimate property damage, the damage estimates are more likely to be under the \$500,000 threshold meant to trigger toxicological testing. The most striking case of this so far involved hazardous materials impinged by fire and evacuation. On November 9, 1987, a Norfolk Southern train derailed near the town of Morenci, Michigan. ^{5/} Twenty cars were involved in the derailment and a fire ensued, involving an empty tank car last containing sodium hydroxide. Local officials evacuated two farmhouses (eight people) because of the danger of the fire impinging

^{2/} SP's *Information Package*, undated.

^{3/} Currently under investigation, NTSB Docket No. DEN-87-FR-008, Glendive, Montana.

^{4/} Currently under investigation, NTSB Docket No. DEN-88-FR-001, Kenesaw, Nebraska.

^{5/} Currently under investigation, NTSB Docket No. CHI-88-FR-004, Morenci, Michigan.

the tank car. The railroad official at the scene estimated the damage at \$400,000, and therefore no toxicological tests of the train crew were taken. The final railroad depreciated value cost estimate for the accident was \$480,000. The Safety Board's final damage estimate, however, including the cost of railroad property, lading loss and wreck clearing, was \$1,034,000.

Another accident, on November 11, 1987, at Stanton, Tennessee, involved the derailment of a CSX Transportation, Inc. (CSX), freight train. ^{6/} The train was traveling about 49 mph when 4 of the 5 locomotive units and 32 cars derailed. A fire broke out around the locomotives due to ruptured diesel fuel tanks. The Safety Board's total damage estimate, based on railroad property damage, lading loss, and wreck clearing, was approximately \$2 million. However, the railroad did not test the train crew; subsequently, the railroad reported its final damage (using depreciated value) as \$400,000. The Safety Board's final damage estimate, including railroad losses, lading loss, and wreck clearing, totaled \$2,030,000.

The Safety Board believes that the number of mandatory tests conducted under the FRA rule should be expanded. This can be done by reducing the railroad property damage criterion. The railroads are now required to use \$150,000 "current replacement cost" as the criterion for reporting accidents to the Safety Board, and this would also be an appropriate amount to use as the property damage estimate criterion to trigger postaccident testing.

Furthermore, the FRA mandatory program should capture all serious railroad accidents. During interviews, several railroad managers indicated that there is confusion as to the definition of "impact accident" in the rules and whether or not testing is to be undertaken under the postaccident testing requirements of the FRA rule. To qualify for postaccident testing, an impact accident must have resulted in a reportable injury and at least \$5,200 (in 1987) in railroad-reported damage, or \$50,000 in railroad-reported damage. Indeed, the FRA has fined at least one railroad for testing employees (two were found positive for marijuana) after an impact accident that resulted in reportable injuries but less than \$5,200 in damage. The Safety Board believes that any impact accident resulting in an injury, as defined at 49 CFR 225.5(3)(iii), should require testing and that arbitrary monetary distinctions should not determine whether testing will be undertaken in these cases.

If the changes suggested by the Safety Board are made, approximately 600 accidents would qualify and an estimated 4,000 employees would be tested each year under the mandatory provisions of the rule, as opposed to the 179 events and 770 employees tested in 1987 (of whom 46 tested positive for alcohol and/or drugs, including prescription drugs). ^{7/}

Subpart D of the rule allows railroads to require any covered employee to submit to a breath or urine test under three "reasonable cause" circumstances :

1. "Reasonable suspicion" that the employee is under the influence of or impaired by alcohol and/or a controlled substance(s);
2. Involvement in a reportable accident or incident; or

^{6/} Currently under investigation, NTSB Docket No. FTW-88-FR-005, Stanton, Tennessee.

^{7/} FRA Accident/Incident Bulletin No. 155, Calendar Year 1986, published June 1987.

3. Commission of a rule violation or operating error.

An 8-hour time limitation (from observation of error/violation to sample collection) is also prescribed.

The Safety Board is concerned that few railroads use breath testing in their reasonable cause testing programs now being conducted: only three of the eight railroads interviewed conduct alcohol breath testing in addition to urine testing--Central Vermont Railway, Inc., Illinois Central Railroad, and Florida East Coast Railway Company (FEC). The FRA indicates that only 11 railroads now use breath testing in their reasonable cause testing programs.

The Safety Board believes that the reliance by many companies on urine testing alone may significantly limit their ability to detect alcohol impairment in reasonable cause testing. It is well known that urine is an unreliable specimen for the quantification of alcohol in the body (dependent on fluid intake, and time of last voiding). Considering an approximate elimination rate of 0.015 percent per hour and the average delay from accident occurrence to sample collection of 5 1/2 hours, an employee with, for example, a blood alcohol concentration of 0.08 percent or less could escape detection under the urine testing provisions of the rule.

The principal reason cited by railroads for not employing breath testing appears to be the potential cost of such a program. Portable breath testers, such as the widely used Alcosensor, cost approximately \$500 per unit (not including training cost). In lieu of using breath testing devices, companies are relying on the ability of supervisors and coworkers to detect alcohol by the "signs and symptoms" of alcohol impairment. However, the inability of law enforcement and medical personnel to reliably detect alcohol impairment by such behavioral cues in anti-drunk driving programs is well documented. Therefore, the Safety Board believes that the FRA should require the use of alcohol breath testing, in conjunction with urine testing for drugs, in reasonable cause testing programs under this rule.

One of the Safety Board's initial concerns was the potential for delays in postaccident collection of toxicological samples (blood, breath, urine, etc.) from crewmembers and other individuals. Such delays can seriously diminish and even invalidate the probative value of the tests; this is especially true for alcohol because of its rapid rate of elimination in the body. Yet the rule was promulgated with no specific time limit for sample collection; it merely states that "the railroad shall make every reasonable effort to assure that samples are provided *as soon as possible after the accident or incident*" (emphasis added). Two years after the rule was promulgated, the FRA administrator echoed the Board's concern when he noted that it had taken an average of more than 4 hours after an accident to obtain toxicological samples collected and that there had been "many cases in which it is seven or eight." ^{8/}

^{8/} Opening comments of John H. Riley, Administrator, Federal Railroad Administration, Informal Safety Inquiry Into Alcohol and Drug Use, February 18, 1987, Washington, D.C.

An April 1988 analysis by the U.S. General Accounting Office (GAO) of FRA testing records on accidents from April 1987 to the end of October 1987 ^{9/} reported that the time between accident and toxicological sample collection averaged about 5 hours and ranged from about 1 to 12 hours in the 70 nonfatal accidents from which data were available. For the 13 fatal accidents studied, the time ranged from 5 to 26 hours.

The Safety Board has examined the time intervals from accident occurrence to sample collection in 46 accidents (involving 47 crews, 189 employees) investigated by the Board in 1987. The average time, for those employees for whom information was available, was about 5 1/2 hours; the range was from 1 1/2 to 14 hours.

There are many reasons why delays in sample collection occur: the general confusion at accident sites; debriefing of train crew(s) to determine why the accident occurred; a lack of understanding of the rule's requirements; inadequate management direction; the need to treat injured crewmembers; the train crews' participation in handling the emergency; and long distances to hospitals or other sample collection sites. However, although a delay in sample collection of 5 1/2 hours is not critical for some drugs, such as marijuana, because their elimination rate in the body allows the detection of the parent drug or its metabolites in blood and/or urine for a long time, the Safety Board has serious concerns on two counts -- concerns which warrant action by the FRA.

First, sample collection delays should be a prime focus for correction. Delays in sample collection can seriously limit the ability of analysts to detect the parent drug or its psychoactive components (cocaine, some amphetamines, and PCP) in the blood. Information on these components and their respective concentrations in the blood is often vital to the interpretation of possible drug effects on human performance at the time of the accident--information essential in the determination of the probable cause of the accident.

Second, for the determination of possible alcohol impairment, even a 5 1/2-hour delay can preclude the detection of alcohol in the body. (Most States have established a 3-hour limit for the collection of breath/blood alcohol samples for highway law enforcement purposes.) Therefore, the Safety Board believes that the FRA should amend the rule to set a time period no greater than 4 hours for the collection of toxicological samples, and to require railroads to submit to the FRA a written explanation of the reason(s) for failure to do so. Further, the Federal rule should be explicit in stating that samples must still be collected even if the time period stipulated for sample collection has been exceeded.

The Safety Board believes that the critical elements of an effective drug/alcohol abuse program are:

- aggressive reasonable cause testing (triggered by a wide range of safety-related errors);
- effective management supervision of employees, including proper education of supervisors in the detection of drug/alcohol abuse;

^{9/} General Accounting Office Report No. GAO/RCED-88-120, *Railroad Safety: Reporting Time Frames and Results of Post-Accident Drug Tests*, issued April 1988.

- postaccident testing;
- preemployment testing;
- periodic medical testing; and
- competent drug/alcohol education and treatment programs for employees.

The evidence gathered as a result of its study reinforces the Safety Board's conclusion that these critical elements have not been uniformly or fully utilized by the majority of American railroads.

Concomitantly, information gathered during the investigation supports the Safety Board's views on the importance of these critical program elements. Both management and employees interviewed during the course of this study agree that the firm anti-drug/alcohol policies and practices which railroads implemented in the early to mid-1980's have dramatically reduced overt alcohol and drug use on the job. Those interviewed frequently reported that more active management attention to enforcing company alcohol and drug policies/rules coupled with firm disciplinary actions against violators began in this period.

The incomplete success of the current rule is not, we suggest, based on a true test of the potential effectiveness of reasonable cause testing and the other measures proposed by the Safety Board; it is a reflection of the failure of many railroads to fully and aggressively utilize these measures. The Safety Board believes that the FRA should first encourage railroads to fully implement and utilize these critical program measures through regulatory and other appropriate means before embarking on additional measures, such as random testing.

One measure that the FRA should consider implementing to increase control of employees' performance in safety-sensitive positions is requiring a Federal medical certificate. The Federal Aviation Administration requires all airmen to have such a certificate before they can operate aircraft, and the Federal Highway Administration requires that interstate commercial motor vehicle drivers have a valid medical certificate to drive a truck or bus. Certainly, train engineers should be medically fit. Since many railroads have medical offices, it would not be unreasonable for the FRA to require employees in safety-sensitive positions to provide medical information, to FRA's criteria, that they are medically fit for duty; then each would receive a medical certificate, through the railroad medical officer. One of the major areas to be addressed in the fitness certificate would be alcohol and drug abuse. Abuse of alcohol and/or drugs would be a violation of the medical fitness certificate requirements, resulting in withdrawal of the certificate. Without the medical certificate, an employee in a safety-sensitive position could not operate a train or perform any other safety-sensitive service for the railroad until that employee again met medical certificate requirements.

In a number of serious accidents investigated by the Safety Board in 1987, proper supervisory policies and procedures were in place, but railroad supervisors had failed to enforce or execute their duties under these policies. For example, in the Chase, Maryland, crash, the Safety Board found that the Consolidated Rail Corporation (Conrail) management had a substantial supervisory force to oversee its operations and that management required its supervisors to make frequent checks of fitness for

duty at reporting points. However, two Conrail supervisors at Bay View Yard, the train's departure location, did not recognize that the traincrew of ENS-121 failed to make a proper and complete automated cab signal test, failed to secure a proper radio, and failed to make a predeparture brake test. The Safety Board concluded that Conrail should have supervised the crewmembers of train ENS-121 better during the predeparture tests at Bay View Yard.

Further, the accident illustrated the importance of monitoring relevant aspects of operating employees' behavior, such as reviewing their motor vehicle driving record, absenteeism, job performance, and refusals to work. In this case, the engineer of ENS-121 had a very poor driving record and if motor vehicle record checks had been in place on this railroad, supervisory personnel may have been able to determine that the engineer's motor vehicle driving record was indicative of possible substance abuse.

A 1986 commuter railroad accident investigated by the Safety Board illustrates the potential value of checks of drivers' licenses and work attendance records for identifying employees with alcohol/drug use problems before they become involved in an accident. On December 10, 1986, Southern Pennsylvania Transportation Authority (SEPTA) train 0151 of the Regional Rail Division passed two restricting signals and collided with the rear of train 9843, which was stopped at Suburban Station, Philadelphia. In subsequent toxicology tests, the engineer of train 0151 tested positive for cocaine use. Two passenger attendants on train 9843 tested positive, respectively, for marijuana use and for marijuana/cocaine use. ^{10/} The Safety Board determined that the probable cause of the accident was, in part, the failure of the engineer of train 0151 "to comply with the approach and stop signals."

The engineer of train 0151 had been with SEPTA since January 11, 1983 (and had previous employment with Conrail). A review of his Pennsylvania Department of Motor Vehicles driving record indicated that the engineer's license had been suspended for more than 3 years for failure to respond to citations and failure to pay fines. SEPTA appeared unaware of the engineer's driving record.

The engineer's work/performance record was, however, even more suggestive of an employee with an alcohol/drug abuse problem. In the previous 2 years, his record showed nine occasions in which he was disciplined for attendance issues--often for missing work surrounding weekends. In addition to a pattern of substandard work attendance, the engineer's performance record also showed warnings and a suspension for violating company rules and regulations. Despite the patterns of attendance and performance problems, the engineer received only written warnings or supervisory "counseling." There was no evidence that any inquiry into possible alcohol and/or drug use problems was made by company supervisors.

The FRA *Field Manual For Control of Alcohol and Drug Use In Railroads*, issued to railroads before the December 10 accident at Philadelphia, presents important guidance to railroad supervisors in the "early identification of work performance problems" (Section 9.5.2). A partial list of key criteria for early recognition of employee problems includes:

^{10/} Railroad Accident/Incident Summary Reports--Philadelphia, Pennsylvania, December 10, 1986, and Ardmore, Pennsylvania, January 26, 1987 (NTSB/RAR-88/01/SUM).

- drowsiness or sleeping on the job;
- increased absenteeism, especially on Mondays, after holidays, and after paydays;
- increased tardiness or unexplained absence from the work station;
- increased or frequent use of sick leave;
- increased risk taking behavior;
- decreased quality of work; and
- encounters with police.

If those responsible for supervision of the engineer of train 0151 had been more familiar with the information contained in the FRA Field Manual and also had been aware of the engineer's driving record, more appropriate supervisory actions (including referral to an employee assistance program (EAP) counselor for evaluation and drug screening) might have avoided this accident.

The Safety Board sees three areas that railroads must strengthen to improve supervisory controls in regard to alcohol and drug use. First, a system must be devised by railroads for supervisors to meet traincrews at departure and crew-change locations and to observe the conditions and actions of the crews as they undertake their predeparture tests. The FEC and the Denver and Rio Grande Western Railroad use a form that must be signed at all departure locations by a supervisor certifying that the traincrew was observed and did not appear to be impaired. The SP had such a program until May 1, 1988. The Safety Board strongly supports this approach which certifies that traincrews have been observed and that they do not show evidence of impairment.

Second, senior railroad management must do a better job of translating to its lowest levels of supervisors that company policies on alcohol and drug use are very serious and that any relaxation of them will be dealt with firmly. Senior railroad management must monitor the actions or inactions taken by lower officials (i.e., review the written certifications periodically) to ensure that the desired actions are actually taking place. The SP, for example, has strengthened its monitoring program at its Yuma facility: additional supervisory personnel have been hired and new train crew reporting procedures require face-to-face meetings between supervisors and train crews, including an examination of safety rules.

Finally, there must be constant reminders that alcohol and drug use may be reflected in actions other than actual visible impairment: for example, lack of proper predeparture tests of safety equipment and violations of any safety and/or operating rules. Further, railroad management/supervision can undertake reviews of past actions by railroad employees, including checks on motor vehicle driving records, absenteeism, and refusals to work.

In sum, the Safety Board believes that stronger railroad management actions can be taken in supervisory control and that increased supervisory control should be applied by all railroads. Training for supervisors is an important element of such a program.

Therefore, as a result of its study, the National Transportation Safety Board recommends that the Federal Railroad Administration:

Amend 49 CFR Part 219 to require postaccident toxicological testing of all employees in safety-sensitive positions. (Class II, Priority Action) (R-88-23)

Amend 49 CFR Part 219 to require that railroads adopt mandatory reasonable cause testing programs for all employees in safety-sensitive positions. (Class II, Priority Action) (R-88-24)

Amend 49 CFR Part 219 to expand the circumstances which will trigger reasonable cause testing to include any violation of any safety or operating rule which can compromise the safety of operations or the welfare of other employees. Reasons for reasonable cause testing could also include work attendance, work habits, and poor motor vehicle driving records. (Class II, Priority Action) (R-88-25)

Amend 49 CFR Part 219 to require toxicological testing in all train accidents in which estimated railroad damage based on replacement costs and other estimated losses, including nonrailroad property losses, are \$150,000 or more. (Class II, Priority Action) (R-88-26)

Amend 49 CFR Part 219 to require toxicological testing of all employees involved in any impact accident resulting in an injury as defined in 49 CFR 225.5(3)(iii). (Class II, Priority Action) (R-88-27)

Amend 49 CFR Part 219 to require periodic medical examinations (return-to-work, return-from-furlough, and others as appropriate) for all railroad employees in safety-sensitive positions, and to require that alcohol and drug screening be made a part of those examinations. (Class II, Priority Action) (R-88-28)

Amend 49 CFR Part 219 to require alcohol breath testing in addition to urine testing when any condition under Subpart D (reasonable cause testing) is met. (Class II, Priority Action) (R-88-29)

Require a Federal medical certificate for all railroad employees in safety-sensitive positions. In developing a medical certificate program, establish medical standards similar to programs already used by the Federal Aviation Administration and the Federal Highway Administration. (Class II, Priority Action) (R-88-30)

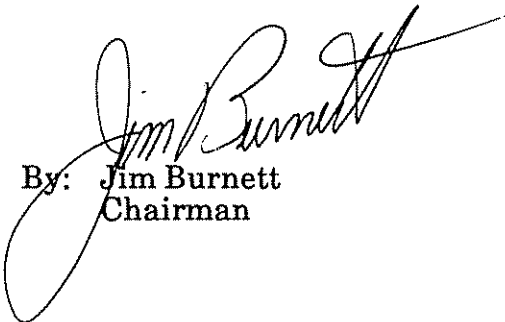
Amend 49 CFR Part 219 to require railroads to collect all appropriate toxicological samples as soon as practicable and not more than 4 hours after the triggering event. Written explanation of the reason(s) for failure to collect samples within 4 hours or not at all must be submitted to the Federal Railroad Administration. (Class II, Priority Action) (R-88-31)

Amend 49 CFR Part 219 to require railroads to monitor relevant behavior and performance, such as work attendance, work habits, and motor vehicle driving records, of all employees in safety-sensitive positions and to recommend to counseling those employees whose work attendance, work habits, or motor vehicle driving records are consistent with possible substance abuse. (Class II, Priority Action) (R-88-32)

Amend 49 CFR Part 219, Subpart D, to require annual drug and alcohol detection training for all employees who are required to monitor fitness for duty of other railroad employees including covered (hours-of-service) employees, such as conductors, yardmasters, foremen, and others. (Class II, Priority Action) (R-88-33)

Also, the Safety Board issued Safety Recommendations R-88-34 through -36 to members of the Association of American Railroads, R-88-37 to members of the Railway Labor Executives' Association, R-88-38 to the Urban Mass Transportation Administration, and R-88-39 to the Association of American Railroads.

BURNETT, Chairman, KOLSTAD, Vice Chairman, and LAUBER, NALL, and DICKINSON, Members, concurred in these recommendations.



By: Jim Burnett
Chairman