



National Transportation Safety Board

Washington, D.C. 20594

Safety Recommendation

Date: August 2, 1988

In reply refer to: R-88-34 through -36

To Members of the Association of
American Railroads
(see distribution list attached)

Log R-604C

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.

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, 2/ 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 train crew 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.

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

2/ For more detailed information, read Railroad Accident Report--"Rear-end Collision of Amtrak Passenger Train 94, the Colonial, and Consolidated Rail Corporation Freight Train ENS-121, on the Northeast Corridor, Chase, Maryland, January 4, 1987" (NTSB/RAR-88/01).

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. ^{3/} 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:

- 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.

^{3/} Railroad Accident/Incident Summary Reports--Philadelphia, Pennsylvania, December 10, 1986, and Ardmore, Pennsylvania; January 26, 1987 (NTSB/RAR-88/01/SUM).

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.

During the course of the Safety Board's interviews with supervisors at the 10 railroads, the staff discussed the related issue of supervisory access to employee performance and attendance records. First-level supervisors as well as crew dispatchers and crew chiefs indicated the widespread difficulty in accessing easily, up-to-date records on their employee's attendance and work patterns. Compounding this difficulty is the absence of a consistent, daily supervisory-to-employee relationship because of variable work schedules of employees and supervisors, transfers, and mobility of crews across the railroad's system. Supervisors and crew dispatchers complained that in order to review attendance/performance records they would have to visit records facilities at other locations and examine handwritten or typed paper forms or records.

The development of computerized crew dispatching (and computerized employee records) now in use by other railroads, including the Union Pacific (UP) and the Burlington Northern Railroad Company (BN), offers a technological solution to the problem of early accessible employee records. A crew dispatcher at the UP indicated to the Safety Board's staff the ease at which almost instant access to relevant employee records can now be made. Considering the capabilities of present-day computer systems, the Safety Board believes that a computerized system that would automatically identify patterns of employee absenteeism, tardiness, and/or job performance, and other decrements is conceivable. Short of this, improved access to relevant employee attendance work performance records by supervisors is clearly necessary and achievable for many railroads.

In a more recent accident investigated by the Safety Board, a major safety issue was supervisory oversight. On June 15, 1987, two Southern Pacific Transportation Company (SP) freight trains collided head-on. ^{4/} One person was killed, several were injured, and property damage exceeded \$1.7 million. In this case, supervisors failed to enforce procedures in SP's alcohol/drug policy. The yardmaster told the Safety Board that she believed the engineer of one of the trains had been drinking alcohol before assuming duty. However, she took no action to advise her supervisor so that the engineer could be removed from service for a Rule G violation. Additionally, the conductor of one of the trains failed to complete the required written certification that crewmembers were in compliance with Rule G. Indeed, further investigation by the Safety Board revealed that a number of SP conductors were refusing to complete the required written forms. The trainmaster responsible for supervision of all operations in the division had informed the conductors who are responsible for the direct supervision of the train that it was their duty to complete the forms. However, the trainmaster apparently took no action to enforce the policy.

^{4/} Railroad Accident Report--"Head-on Collision of Southern Pacific Transportation Company Freight Trains, Yuma, Arizona, June 15, 1987" (NTSB/RAR-88/02).

The supervisory oversight breakdowns evident in this accident demonstrate that a railroad with an aggressive alcohol and drug policy and a strong management commitment to that policy must be vigilant in clearly monitoring the daily actions of its supervisors (including--perhaps most importantly--its lower-level supervisors) in enforcing and carrying out that policy.

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 train crews at departure and crew-change locations and to observe the conditions and actions of the crews as they undertake their predeparture tests. The Florida East Coast Railway Company 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 train crew 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 train crews 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.

Most railroad companies' training on the alcohol and drug rules focuses on the prohibitions and penalties of the rules; only two of the railroad employees interviewed said they had had training designed to teach employees about the effect that alcohol and drug use would likely have on their performance. Additionally, little training has been provided to the employee who is responsible for the safety of the train--generally, the conductor, in some cases, the engineer--on the effect of alcohol and/or drug use on his or her performance. Since the conductor is responsible, in most cases, for the actions of the train crew, some type of formal training on alcohol and drug detection and their effects on job performance should be made available. Likewise, the engineer, the person actually operating the train, should be thoroughly trained and informed of the likely effects of drug use on his or her performance.

Therefore, as a result of its study, the National Transportation Safety Board recommends that the members of the Association of American Railroads:

Require supervisors to review computerized crew dispatching and related work records and motor vehicle driving records to evaluate employee work habits and absenteeism as part of a documented program to identify employees in safety-sensitive positions who may use alcohol and/or drugs. (Class II, Priority Action) (R-88-34)

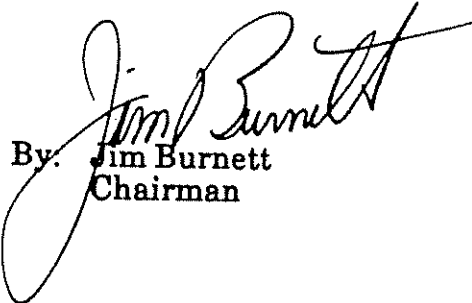
Provide annual training in drug and alcohol detection for all employees, such as conductors, yardmasters, foremen and others, who are required to monitor the fitness for duty of other railroad employees. (Class II, Priority Action) (R-88-35)

Provide periodic training to all railroad employees on the effects of alcohol and drug use as they relate to their on-the-job work performance. (Class II, Priority Action) (R-88-36)

Also, the Safety Board issued Safety Recommendations R-88-23 through -33 to the Federal Railroad Administration, 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.

The National Transportation Safety Board is an independent Federal agency with the statutory responsibility "... to promote transportation safety by conducting independent accident investigations and by formulating safety improvement recommendations" (Public Law 93-633). The Safety Board is vitally interested in any action taken as a result of its safety recommendations. Therefore, it would appreciate a response from you regarding action taken or contemplated with respect to the recommendations in this letter. Please refer to Safety Recommendations R-88-34 through -36 in your reply.

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


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