



Massachusetts Bay Transportation Authority

Safety Update: 49 CFR Part 270: System Safety Program

Fiscal and Management Control Board

April 12, 2021

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Agenda

- Overview of FRA's 49 CFR Part 270: System Safety Program (SSP) Plan Regulation
- SSP Plan Elements
- SSP Plan Gap Analysis Tool
- Assessments and Audits
- Questions



49 CFR Part 270 Timeline

| | |
|--------------------------------------|---|
| Sept. 7, 2012 | Notice of Proposed Rulemaking |
| Aug. 12, 2016 | Final Rule Published |
| Oct. 12, 2016 | Effective Date |
| February 10, 2017 | FRA stayed 49 CFR Part 270 until March 21, 2017, then extended the stay multiple times until March 4, 2020. |
| March 4, 2020 | Updated Final Rule Published |
| July 2, 2020 | Updated Deadline for consultation meeting with labor union(s) |
| March 3, 2021 | System Safety Program (SSP) Plan submitted to FRA Deadline March 4, 2021 |
| June 1, 2021 | Response due back from Federal Railroad Administration (FRA) |
| <u>When FRA accepts the SSP Plan</u> | |
| Approval Date +36 months | Implement SSP Plan |



System Safety Program (SSP) Plan Elements

Administrative

1. SSP Policy Statement
2. SSP Goals
3. Railroad System Description
4. Railroad Management & Organizational Structure
5. SSP Implementation Process
6. Maintenance, Repair, and Inspection Program
7. Rules Compliance and Procedures Review
8. SSP Employee/Contractor Training
9. Emergency Management
10. Workplace Safety

Hazard Management

11. Public Safety Outreach Program
12. Accident/Incident Reporting & Investigation
13. Safety Data Acquisition
14. Contract Procurement Requirements
15. Risk-based Hazard Management Program
16. Risk-based Hazard Analysis
17. Technology Analysis & Implementation Plan
18. Safety Assurance
19. Safety Culture
20. Internal SSP Assessment



SSP Plan Gap Analysis Tool

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49CFR270 System Safety Program Plan - Gap Analysis Tool

Note: A key is provided at the end of this tool with defined status' to complete the 'Implementation Status' column.

| Service Provider: | MBTA | | Boston, MA | |
|---|-----------------------------------|-----------------------|--|-------------------------------|
| Questions | Entity's Documentation Source | Implementation Status | Entity/Department Responsible for Implementation | Estimated Implementation Date |
| Element 1 - SSP Policy Statement | | | | |
| Process Objectives | | | | |
| To provide a policy statement in the railroad's SSP plan that endorses the railroad's system safety program. | | | | |
| SSP Requirement | | | | |
| Does your SSP have a safety policy statement that includes at least the following minimum requirements: | | | | |
| Defines the railroad's authority for the establishment and implementation of the system safety program? | MassDOT/MBTA Railroad Safety Plan | DOC | | |
| Describes the safety philosophy and safety culture of the railroad? | MassDOT/MBTA Railroad Safety Plan | DOC | | |
| Signed by the GM/chief official manager at the railroad? | MassDOT/MBTA Railroad Safety Plan | PLN | MBTA Safety | 1/24/2017 |
| <i>SSP Standard 270.103(b)(1)-(3)</i> | | | | |
| Element 2 - SSP Goals | | | | |
| Process Objectives | | | | |
| To provide a statement in the railroad's SSP plan defining the goals for the railroad's system safety program. This statement shall describe clear strategies on how the goals will be achieved and what management's responsibilities are to achieve them. | | | | |
| SSP Requirement | | | | |
| At a minimum, does your railroad SSP provide goals that are: | | | | |
| (1) Long-term? | MassDOT/MBTA Railroad Safety Plan | PLN | Keolis Safety | |
| (2) Meaningful? | MassDOT/MBTA Railroad Safety Plan | DOC | | |
| (3) Measureable? | MassDOT/MBTA Railroad Safety Plan | DOC | | |
| (4) Focused on the identification of hazards and the mitigation or elimination of the resulting risks? | MassDOT/MBTA Railroad Safety Plan | DOC | | |
| <i>SSP Standard 270.103(c)(1)-(4)</i> | | | | |
| Element 3 - Railroad System Description | | | | |
| Process Objectives | | | | |
| To provide a statement in the railroad's SSP plan describing the railroad's system. | | | | |



Assessments and Audits

Internal Assessment

Passenger Rail Operator shall annually conduct an assessment on implementation of the SSP

External Audit

FRA will review internal assessments and perform on-site audits for SSP conformance



Questions?

2021

MassDOT/MBTA Railroad System Safety Program Plan

