

# Corrective Action Plan Process

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## Hazard Tracking

### Hazard Identification Sources:

- Employee Reporting
- Observations
- Incident Investigation
- Trend / Data Analysis
- Internal / External Audits

## Hazard Tracking:

- Risk assessed looking at the probability and severity
- Assigned to Safety Investigator
- Mitigations are developed and tracked
- Tracking and follow up conducted with impacted departments
- Information added onto the hazard tracking log and tracked through closure





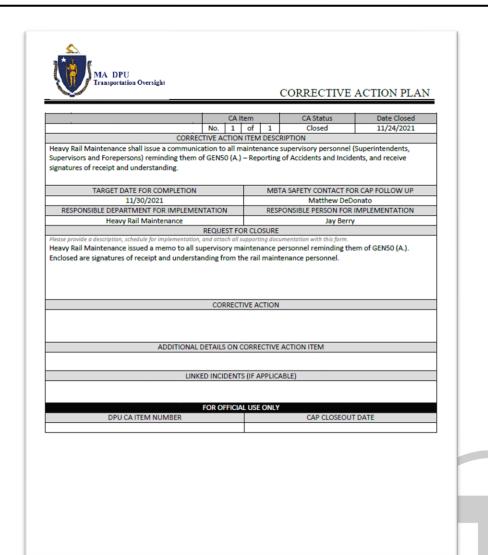
# Hazard Tracking Log

Date Identified	Location/Work Area	Hazard Description	Identification Method	Severity	Probability	Initial Risk Assessment	Status	Mitigations Identified	Open Mitigations	Resulting Risk Assessment
12/23/2021	Reservoir Yard (and BC Yard)	Multiple concerns at Reservoir Yard: exposed switch heater wires and rail grounding wires, uneven frogs, and elevated grates, Speed sign that isn't realistic at a decline tracks. BC Yard has similar issues.	Safety Hotline,	2. Critical,	6. Improbable,	12. Acceptable with management review	Open,	1	1 1	
12/22/2021	Codman Yard	The maintainer questioned why the power section could not be de- energized remotely from OCC/PD dispatcher.	Good Faith Safety Challenge,	2. Critical,	6. Improbable,	12. Acceptable with management review	Complete,	1	0	12. Acceptable with management review
12/20/2021	Hand scanners at garages	Concerns about increasing COVID cases and using hand scanners.	Safety Hotline,	2. Critical,	6. Improbable,	12. Acceptable with management review	Complete,	1	1 0	12. Acceptable with management review
12/14/2021	Mattapan Station	Gas odor at Mattapan Station.	Safety Hotline,	2. Critical,	6. Improbable,	<ol> <li>Acceptable with management review</li> </ol>	Open,	1	1	
12/13/2021	Charlestown Bus Yard	Flaggers who are assisting the gate repair are not dressing appropriately for the weather.	Safety Hotline,	4. Minor,	6. Improbable,	24. Acceptable	Complete,	1	0	24. Acceptable
12/12/2021	South Station Silver Line	10ft of damaged yellow tactile on the Transit Way platform poses a tripping hazard	Safety Hotline,	3. Moderate,	5. Remote,		Open,	1	1	
12/11/2021	Southampton Bus Garage	Two AEDs at the garage are not charging.	Safety Hotline,	2. Critical,	6. Improbable,	<ol> <li>Acceptable with management review</li> </ol>	Complete,	1	0	12. Acceptable with management review
12/7/2021	OL Systemwide	Employee reported that Orange Line cabs are no longer being cleaned and that the cleaning stopped on 12/1.	Safety Hotline,	2. Critical,	6. Improbable,	12. Acceptable with management review	Complete,	1	1 0	12. Acceptable with management review
12/5/2021	North station Turnback	There is an old piece of rail left between the tracks that someone may fall on. There is also a broken wooden platform and someone may fall from there.	Safety Hotline,	3. Moderate,	5. Remote,	15. Acceptable with management review	Open,	1	1 1	
12/4/2021	Bus Systemwide	TransitMaster will freeze from time to time, then reboots causes the operator without a radio. 2. No call can be made when the radio on buses go into fallback mode 3. Bus Operators only get a beep when there is an ""all call" for an emergency evacuation or last train notifications.	E-mail.	3 Moderate	6. Improbable,	18. Acceptable	Open.		1	
	Lechmere Station ROW	Contractors working without proper safety vest	Safety Hotline,	2. Critical.	6. Improbable.	12. Acceptable with management review				12. Acceptable with management review
12/3/2021	Learning Station NOW	Contractors werning minimal proper seriety rest	curcty Frounts,	z. Citucai,	o. Improbabio,	managamantroview	Complete,			management review
12/1/2021	80 Broadway, Everett Shop	The building is too hot to work and the air circulation/quality is poor.	Safety Hotline,	4. Minor,	5. Remote,	20. Acceptable	Complete,	1	0	20. Acceptable
12/1/2021	RL: Between Davis Crossover and Alewife, MM 291 & BL: MOW area of Orient Heights	An emergency exit lighting is out in tunnel RL, Insufficient lighting at the MOW area of Orient Heights	Observation - Employee,	3. Moderate,	6. Improbable,	18. Acceptable	Open,	1	1 1	



## **Corrective Action Plans**

- Created to address hazardous conditions and sub-standard safety performance
- Developed in collaboration with affected department
- Focused on eliminating risk or mitigating to an acceptable level
- Formally reviewed and approved by DPU
- Tracked and monthly meetings held to review progress
- Implementation reviewed and verified prior to closure





## Risk Mitigation and Monitoring

- Upon closure, CAP moved to risk mitigation and monitoring
- Check on effectiveness of risk mitigations
- Ensure mitigations are effectively implemented and performing intended function
- Reviewed periodically to ensure no new hazards have arisen



### MASSACHUSETTS BAY TRANSPORTATION AUTHORITY



SAFETY SOP: SOP21-002

SUBJECT: Risk Mitigation & Monitoring (RMM) SOP

AFFECTED PERSONNEL: MBTA Safety Employees

ISSUED: 1/4/2021 REVISION: 0 PAGE: Page 1 of 3

#### **PURPOSE**

The purpose of the Risk Mitigation and Monitoring (RMM) process is to ensure the effectiveness of safety risk mitigation activities performed by key MBTA departments under formally-documented Corrective Action Plans (CAPs) and/or the Safety Risk Management (SRM) process, as well as temporary mitigations and initial actions performed in response to reported hazards and events. Through objective verification activities, RMM confirms that mitigations are effectively implemented and performing their intended functions. This program is intended to satisfy requirements established in 49 Code of Federal Regulations (CFR) Part 673.27(b)(2).

#### Related MBTA Safety Resource

- Safety Risk Management SOP 21-0
- Safety Risk Management Training: Part 1
- Risk Mitigation & Monitoring Log (RMML)
- MBTA Transit Safety Plan, Chapter 5 & 6

### SCOPE

All MBTA departments responsible for implementing safety risk mitigations are subject to scheduled and unscheduled monitoring of safety risk mitigation activities. MBTA departments are expected to support the Safety Department in collection of information to verify risk mitigation effectiveness through interviews, records reviews, and field-based inspections and observations.

Potential sources of risk mitigations subject to monitoring may include the following:

- 1. National Transportation Safety Board (NTSB) Recommendations
- 2. Federal Transit Administration (FTA) Safety Advisories
- 3. Massachusetts Department of Public Utilities (DPU) Independent Assessments
- 4. Chief Safety Officer Directives
- 5. Good Faith Safety Challenges
- 6. External/Internal Audit Findings
- 7. Safety Event Investigations
- 8. Non-conformance with and sufficiency of MBTA rules and procedures
- 9. SRM Process (SRM Worksheet, Job Hazard Analysis, Safety Certification)

MBTA's RMM process extends to mitigations enacted via the following methods:

- 1. Any CAI
- 2. Other SRM activities associated with an initial risk factor of Unacceptable
- Other SRM activities at the discretion of Safety management in consideration of recent trends, safety initiatives, etc.