

Consultation comments and responses

Document Title: Management of Safety- Related Rail Vehicle Defects.

Document number: RIS-8250-RST

Consultation closing date: 17 January 2023

1. Responders to consultation

No	Name	Company
1	Keith Mack	LNER
2	Tracy Read	Nexus
3	Russell Keir	ORR
4	Mark Molyneux	RDG
5	Graham Prison	Quattro Plant
6	David Smith	Gemini
7	Jay Davies/ Slavina Nikolova	MTREL

2. Summary of comments

Code	Description	Total
-	Consulted	424
CE	Critical errors	
ED	Editorial errors	
TY	Typographical errors	
OB	Observations	
-	Total comments returned	32

Classification codes for a way forward:

- DC – Document change
- NC – No change

3. Collated consultation comments and responses

No	Page	Clause	Comment	Suggestion	By	Way forward	Page	Clause	Response
1	9	2.3.3.3	Timely manner	Can this be clarified or expanded to encourage a reduction in the length of time NIRs are open.	1	NC	-	-	The timeliness of raising, concluding and closing NIRs is included in G 2.3.1.11 as well as G 2.3.3.6.
2		G 2.1.9	Indusi is not included	Our Indusi track brake system could be included on this list.	2	NC	-	-	Noted. G 2.1.9 c) lists only 'common' systems; our understanding is that Nexus Metro is the only user of the Indusi system in the UK. Further the list is 'not exhaustive'
3	4	1.1	Purpose	Include a justification and reasoning to promote industry learning. By adding reasoning to support the justification to why the report was made it will add to better understanding of the issues and the identified risks being managed.	3	DC	4	1.1.6	New paragraph 1.1.6. added: " <i>When used correctly, the information shared in NIR-Online can aid 'corporate memory', enabling industry to learn from past failures, which can help to avoid similar issues arising in future.</i> "
4	4 6	1.1.2(d) 1.1.4 G2.1.5	Consider reference to RIDDOR Schedule 2, Part 5 dangerous occurrences which are reportable in respect of a relevant transport system.	Suggest linking the fault/failure/near miss being reported to a dangerous occurrence for improved data/trend analysis aligned to HSW legislative requirements (referred to in 2.2 and G2.2.6/7).	3	NC	-	-	Noted. However, the Rationale in both sections 2.1 and 2.2 already points back to 1.1.2, which includes RIDDOR.

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5	6	2.1.1	The reference to 2.3.1 seems only related to c) Urgent high risk.	For clarity, separate reference from c) to better capture a) and b) as well.	3	NC	-	-	The reference is deliberately assigned to c) Urgent high risk, as these are the only types that are reported using NIR-Online.
6	6	G2.1.6 (c)	For main line operators only – SMIS informs RIDDOR which in turn informs the Safety Authority.	Explaining this and linking to RIDDOR Schedule 2, Part 5 dangerous occurrences, will make the NIR reporting consistent with SMIS & RIDDOR reporting requirements	3	NC	-	-	G2.1.6 is a list of the RSSB's reporting systems for defects, faults and failures. There is not currently a specific system for reporting issues with digital systems and software.
7	8	G2.3.1.7	Add digital systems and software. Referenced at GA.1.2 (...issues related to software and cyber security) but not in the main text.	With the increasing use of digital systems, it will be worth prompting reporting digital failures to gain a greater understanding of what failure looks like.	3	DC	8	G 2.3.1.7	Agreed. New list item added "(g) <i>Digital systems and software associated with the above.</i> "
8	11	G3.1.5	The Railway Safety Authority (ORR)	Add for transparency	3	DC	11	G 3.1.5 g	Agreed and added
9	12	G A.1.4	Why is an exception is made for ECMs?	Worth explaining as not all ECMs are contracted by the operator.	3	DC	12	G A 1.4	Agreed. Amended to: " <i>An exception is made for ECMs due to their legal responsibility as set out in 1.1.2.</i> " It is understood that ECMs have their own legal obligation for reporting under EU 1078/2012, retained in UK law under SI 2019/837.

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10	N/A	N/A	I think the flowchart that is presented in the separate Technical Note would be helpful to be included in this document (and also the other RIS's referred to)	Please consider including the flowchart in the RIS. It is further suggested that this is added to Appendix A.	4	NC	-	-	Noted. However, keeping the flowchart as a separate document to each RIS makes it easier to manage any future updates to the flowchart. Otherwise, a small change to the flowchart would lead to all of the affected RISs requiring amendment.
11	6	Part 2: Title	This part is about much more than 'Reporting'	Amend to read 'Monitoring and Reporting'	4	DC	6	Part 2	Agreed and amended
12	7	G 2.1.9	Typo	Amend to read '...and failures include....'	4	DC	8	G 2.1.9	Agreed and corrected.
13	8	G 2.3.1.7	This is probably an error, but the guidance doesn't actually state that NIR Online should be used for high-risk defects, faults and failures affecting rail vehicles.	Add: 'a) rail vehicles in the scope of Railway Group Standards.'	4	NC	-	-	2.3.1.1 states the requirement for urgent high-risk defects, faults and failures to be reported using NIR-Online.
14	7	G 2.1.9	The Guidance focuses mainly on Mechanical Failures – which is only part of the story – and is not considered wholly appropriate for modern designs of trains.	Amend b) to read 'Mechanical and electrical systems such as doors, brakes, air supply, body-mounted equipment	4	DC	7	G 2.1.9	Agreed and amended to: " <i>Vehicle equipment and systems such as doors, brakes, air supply and body-mounted equipment, whether mechanical, electrical, electronic or software-controlled.</i> "
15	7	G 2.1.9	The Guidance focuses mainly on Mechanical Failures – which is only part of the story – and is not considered wholly appropriate for modern designs of trains.	Add 'c) Software controlled systems.'	4	DC	7	G 2.1.9	As above.

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16	11	G 3.1.5	Rail Delivery Group has been missed off the list of organisations.	Add 'g) Rail Delivery Group.'	4	DC	11	G 3.1.5	Agreed and added.
17	8	G 2.3.1.7 f	Acronym for On-track machines (OTM) is included no acronym for on-track plant show.	Include acronym OTP for on-track plant.	5	DC	8	G 2.3.1.7 f	Agreed and added.
18	9	G 2.3.2.6	Currently reads "Suppliers in this context can include owners and keepers of rail vehicles, including plant and OTMs."	EITHER Revise to "Suppliers in this context can include owners and keepers of rail vehicles, including OTP and OTMs." OR ""Suppliers in this context can include owners and keepers of rail vehicles, including plant, OTP and OTMs.""	5	DC	9	G 2.3.2.6	Agreed and amended to read: "... <i>plant, OTP and OTMs</i> "
19	14		Definitions	Include acronyms and abbreviations that are used in the document. Acronyms are explained where first used, but including them in with Definitions would make it easier to refer to and absorb the content of the document.	6	DC	14	Definitions	Definitions for ECMs, RUs, IMs, AWS, TPWS, GSM-R, ETCS and PIS have been added for completeness.

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20	1	Title	RIS-8250-RST issue 2 draft 2g is titled 'Management of Safety Related Rail Vehicle Defects', but rail vehicles is only part of the scope, as the standard also covers plant and other equipment/machinery. Review the title	Review title of standard	7	NC	-	-	The title is intended to be brief and succinct. The synopsis provides further explanation.
21	4	1.2.2	Statement reads "If you plan to do something that does not comply with a requirement in this RIS, you can ask a Standards Committee to comment on your proposed alternative".	Which particular committee applies to this standard, i.e. the Rolling Stock (RST) Standards Committee? Consider clarifying	7	NC	-	-	This is template text. The standard being suffixed 'RST' indicates Rolling Stock as the relevant committee. In addition, clause 1.1.1 states that the standard applies to rail vehicles.
22	Various	Various	There are sections in the standard, which only mention rail vehicles, but not plant and equipment, which also fall in scope of the standard. These include 1.1.1 b), G 2.1.6 a), G 2.1.9, 2.2.1, 2.2.6, 2.3.1.1, 2.3.3.5, G A.1.1	Consider adding reference to plant and equipment to all relevant sections as required	7	DC	6 7 8 10	2.1.6 2.2.1 2.3.1.1 G 2.3.3.5	Clauses 1.1.1 and G 2.1.9 already state "includes" (and are therefore not exhaustive) Plant and machinery added to G 2.1.6 a), 2.2.1, 2.3.1.1, G 2.3.3.5 and G A.1.1 for completeness.

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23	7	G 2.2.7	Whilst NIR Online provides national, centralised platform for reporting and sharing urgent high-risk defects, no such centralised platform seem to exist for sharing non- NIRable safety related defects and trends. Standard reads share and communicate 'through user groups, technical committees or other similar means' which is only partially effective without the presence of a common system. RIS-8250-RST Iss 1 Clause C1.2 referred to companies in the rail industry should have common monitoring arrangements.	Is there a plan to develop an enhanced NIR-Online or other system capturing the safety data of the rail industry on a level below NIRs.	7	NC	-	-	Clause G 2.1.6 identifies Rail Notices and SMIS as other reporting systems. G 2.1.8 and G 2.2.6 identify the role of DRACAS and FRACAS systems in tracking failures, and Appendix A gives guidance on the characteristics of reporting and monitoring systems.
24	8	2.3.1.1	Statement reads "When an urgent high-risk defect, fault or failure is identified on a rail vehicle, system or component, an NIR shall be initiated using NIR-Online"	There are additional factors to be considered though, which are not stated The defect has the potential to affect someone else, i.e. not definitely confirmed as isolated case, a one off, site specific or fleet specific issue-maintainer or local process issue, etc. No open NIR currently exists on the NIR-Online for this issue	7	NC	-	-	This is encompassed by the term " <i>urgent high-risk [defect, fault or failure]</i> " as shown in the Definitions section.

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25	8	2.3.1.2	Where NIR-online is unavailable and a form is submitted instead, will/should the contents of the form be uploaded to NIR-online when available again and who is responsible for doing that (e.g. the NOC or the RU/IM/ECM raising the NIR)?	I suggest that the contents of the form are uploaded to NIR online when available again and I would suggest that this is done by the NOC.	7	DC	11	3.1.2	Agreed; added 3.1.2 g) <i>"Update NIR-Online with reports received whilst the system was unavailable"</i>
26	-	-	The current RIS-8250- Issue 1 standard contains a flow chart in Appendix B, illustrating the process. This flowchart is useful. Has this now been taken out in issue 2 draft 2g and added to Technical Note TN105 Issue 1? Also, TN105 Issue 1 states that the note is meant to be read in conjunction with RIS 8250 RST standard, but we can't find in the standard any reference to the note.	Link standard and technical note	7	DC	6	G 2.1.6	The flowchart in TN105 is intended to replace that previously in Appendix B. G 2.1.6 amended to state: <i>"The Standards Catalogue entry for this document on the RSSB website includes Technical Note TN105; this contains a flowchart to aid the decision process as to which system or systems to use."</i>
27	-	-	Could you advise whether the first part of C.1.3 requirement from the current RIS-8250-RST Issue 1 standard has been incorporated in draft issue 2, i.e. "companies in the rail industry should ensure that their supplier advise them of safety related defects...."	Reinstate statement, if removed in draft 2	7	DC	12	G A.1.4	Agreed. G A.1.4 amended to read: <i>"Nevertheless, it is good practice for RUs and IMs to include a contractual requirement that suppliers make them aware of safety-related defects, faults or failures associated with their contracted scope of supply."</i>

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28	-	-	Could you advise whether the RIS-8250-RST Iss 1 guidance from Appendix C Safety-related defect monitoring has been fully replicated in draft 2 of the standards, since this presented useful guidance, including sections C.2 and C.3	Review	7	NC	12	Appendix A	The meaning and intent of the guidance previously in C.2. and C.3 is incorporated in Appendix A.
29	Form 8250 issue 4	Title	The title is 'Urgent Safety-Related Defect Report Form (from RIS-8250-RST)'.	As per the stated on the 02 Business Case for Change Document, the form should be called "Management of Safety-Related Rail Vehicle Defects Form"	7	DC	Form	-	This form is only used for reporting " <i>Urgent high-risk defects</i> " as stated in clause 2.3.1.1. The Form title and its reference in the BCfC have been amended to reflect this.
30	Form 8250 issue 4		Form states 'This form must be used to initiate an urgent safety-related defect'	This should read 'an urgent high-risk defect' in line with the terminology from section 2.3.1 of the new draft standard	7	DC	Form	-	Agreed and amended
31	Form 8250 issue 4		Questions worded differently in RIS-8250-RST issue 2 draft 2g clause G A.1.8 and form 8250 issue 4 section 1	Align questions between: Section G A.1.8 of the standard and Section 1 of the 8250 form. What is actually presented on the NIR-online as questions to the NIR initiator	7	DC	Form	G A.1.8 Table 1	Content of the form and Table 1 have been revised to be consistent with the 'raise' process in NIR-Online. Table 1 now only contains mandatory fields.
32	Form 8250 issue 4		The form refers to 'The Railway Group Standards Catalogue', but the standard now has changed this reference to 'The Standards Catalogue'	Align terminology between standard and 8250 form	7	DC	Form	-	Form amended to read: " <i>The Standards Catalogue on the RSSB website gives ...</i> "