

Consultation comments received on RIS-0386-CCS Issue 1 Rail Industry Standard on Signal
Overrun Risk Evaluation and Assessment



Closing date: 24th August 2020

1. Paul Humphreys, Independent
2. Peter Halliwell, Independent

Summary of comments submitted	Number	Comment categorisation key
Consulted	288	
Critical errors		CE
Editorial		ED
Typographical errors		TY
Observations		OB
Total returns		
Classification codes (CC)		
Document change		DC
No change		NC
Date responses published:		

No	Page	Section	Comment	Proposed revised text	By	Section	Page	Way forward	Responses
1	8	3.1.1. b) v)	Rolling Stock performance, especially braking can be difficult to obtain, even for RUs. Some Rolling Stock companies regard such data as commercially sensitive.	Consider whether specific reference to relevant RGS is required to show that it is not a matter of choice.	1			DC	<p>Conformity with ROGS places responsibilities on duty holders to apply the common safety methods and to cooperate in management of shared risks.</p> <p>Clause 3.1.1 of GMRT2045 'Compatibility Requirements for Braking Systems of Rail Vehicles' requires a GB 'brake force' value be calculated for inclusion in the rolling stock library part of R2.</p> <p>Additional guidance with reference to GMRT2045 will be considered as part of Project 20-028 to update RIS-0386-CCS.</p>
2	8	3.1.1	Although not mentioned specifically, train loading is directly proportional to risk in the SORAT model. Some RUs regard train loading as commercially sensitive information.	Suggest that the phrase aggregated train loading be used. Consider whether specific reference to relevant RGS is required to show that it is not a	1			DC	<p>Conformity with ROGS places responsibilities on duty holders to apply the common safety methods and to cooperate in management of shared risks.</p> <p>3.1.1 g) ii) of RIS-0386-CCS refers to the term</p>

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				matter of choice.					‘passenger loading’. Both terms “training loading” and “passenger loading” are used in the related Network Rail standard NR/L2/SIG/14201 entitled ‘Prevention and Mitigation of Overruns - Signal Overrun Risk Assessment Tool Specification’. The suggested phrase ‘aggregated train loading’ and additional guidance will be considered as part of Project 20-028.
3	12	3.2.3.4 m)	RU change of rolling stock is often DoFT driven and is frequently left to IM to ‘catch up’ using the rolling programme of assessments. When the stock change requires additional mitigation, this does not appear to create a true reflection and allocation of costs.	Consider whether specific reference to relevant RGS is required to show that it is not a matter of choice.	1			NC	Conformity with ROGS places responsibilities on duty holders to apply the common safety methods and to cooperate in management of shared risks. RU as a Proposer in the case of introducing a change of rolling stock, is responsible for identifying and classifying all the hazards associated with the change. When additional mitigations are required as a result, other actors including the IM have a legal obligation to cooperate with the proposer in order to manage shared risk.
4	16	4.3.3	The conditions for Simple RA have been updated in the latest NR documents.	Reflect NR ‘rules’.	1			DC	The conditions for signal overrun risk controls being used as a reference system are to be reviewed and align with current good practice as part of Project 20-028.
5	20	G 5.3.2.4	LX risk is now part of SORAT	Reflect SORAT LX in the RIS	1			DC	G 5.3.2.4 and G A.1.2 will be revised to reflect SORAT now includes level cross collision risk as part of Project 20-028.
6	20	G 5.3.2.4	I am aware of derailments following passing junction signals OFF at excessive speed, but not of derailments following a SPaD where there is no collision. Thus	Suggest research to determine the historic level of derailment following spad to produce a generic RA.	1			NC	A derailment following a SPAD without a collision has occurred before. SRM v8.5 suggest it would occur about once in 10 years (0.109 events per year, for a SPAD at S&C

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			derailment risk may be already generically ALARP>						leading to a passenger train derailment). The frequency of SPAD at S&C leading to Freight Trains derailment is higher (0.689 events/year on passenger line, 0.655 on freight only line). Therefore, it is considered the derailment risk remains part of the overall signal overrun risk assessment.
7	20	G 5.3.2.5	Is SAT reference now relevant?	Delete paragraph.	1				G 5.3.2.5 will be deleted.
8	20-23 24	5.4 6.1	At the time of SORAT development is was always intended that the workshop be scaled down as it was considered no longer to be reasonably practicable. The arrangements in 6.1 cover adequately what was intended to be the end state. (N.B. Driveability has been introduced since the issue of RIS0386 and the Signal Sighting process has been significantly changed.)	Delete the workshop references and replace with population of the database from other sources.	1			DC	According to clause 7.1.3 of Network Rail standard NR/L2/SIG/14201/Mod01 'Prevention and Mitigation of Overruns - Procedure for Risk Assessment of Signals', 'the SORAT/SORAT-LX assessor shall identify any signals that require a VariSPAD assessment to be carried out at a layout risk workshop.' The functionality of SORAT and the VariSPAD assessment aligns with the 'signal overrun risk assessment workshop', referred in 5.4 of RIS-0386-CCS. The update of RIS-0386-CCS will consider the requirements and processes relating to driveability and signal sighting.
9	21	5.4.1. b) 5.4.1. d)	There is a risk of project work replicating (thus not ALARP) or even altering risk mitigation considered during spad incident analysis. Any decision to defer mitigation works to a suitable project should be caught in the project remit	Reword such that steady state varispad data is what is to be included. Add clause regarding deferred works.	1			DC	Further assessment is required for 5.4.1 b) to d) as these signals have a history of signal overrun risk. Additional guidance will be considered during project 20-038 regarding previous VariSPAD information and any deferred mitigation

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			and thus already be incorporated in the works.						works from previous incident analysis.
10	21	5.4.1 c)	The need is to be aware of the previous multi spad circumstances. Sighting should have mitigated the risk.	Reword to reflect that is only concerns where there is an documented unmitigated risk (not hazard) following sighting.	1			DC	5.4.1 c) refers to 'New signals that replace or are equivalent to existing multi-SPAD signals.' These signals are included in the signal overrun risk assessment workshop to be aware of the historic circumstances. Additional guidance will be considered during project 20-038 regarding the need to check previous VariSPAD information on these signals. Additional guidance on concerns arising from driveability and signal sighting process will be included.
11	21	5.4.1 e)	There is a constant danger of rework of signal sighting in workshops.	Reword to reflect that is only concerns where there is an documented unmitigated risk (not hazard) following sighting.	1			DC	Additional requirements and/or guidance will be considered during project 20-038 regarding concerns arising from driveability and signal sighting process, and that there is a need to avoid rework at the workshop.
12	21	5.4.2	It was always the intention in SORAT development that the questions should be populated from other sources e.g. signal sighting, rather than at a workshop.	Reflect completing the database from other sources and using the process in section 6.1 for the review.	1			DC	The signal overrun risk assessment workshop uses structured questions and results from a verified signal overrun risk assessment tool. SORAT is the tool verified by Network Rail for use on all new projects for train-on-train collision risks. Clause 6.1 of NR/L2/SIG/14201/Mod06 states 'layout risk workshop shall be held whenever it is necessary to carry out a VariSPAD assessment or review other signalling risks associated with the layout.' From recent discussions (March 2022) with Network Rail, it has confirmed that Vari-spada workshop is still being carried out.

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									The provision of data to workshops will be reviewed during project 20-038.
13	27-32	Appx B	As above, no longer a workshop.	Reflect use of data sources for populating the database.	1			NC	Workshops are still carried out for signals that are identified to require a further assessment, as reflected in Clause 7.1.3 of NR/L2/SIG/14201/Mod01: 'the SORAT/SORAT-LX assessor shall identify any signals that require a VariSPAD assessment to be carried out at a layout risk workshop.' From recent discussion (March 2022) with Network Rail, it has confirmed that Vari-spada workshop is still being carried out.
14	N/A	All	Given that the content described for update review is related to good practice and that the requirement to undertake overrun risk evaluation and assessment arises directly from CSM-RA, should the container for good practice be a RIS or a Guidance Note? I figure that the subtlety in that is the extent of level of conformity expected with the good practice described. Will the review remit ask the reviewer to consider and justify the most appropriate form of container?	N/A	2			NC	RIS-0386-CCS issue one was produced in response to an industry proposal to set out a process that infrastructure managers and railway undertakings could adopt for the management of signal overrun risk. It was considered that a RIS providing an industry accepted common process would be useful. It removes the need for organisations, in cooperation with others, to produce their own signal overrun risk assessment process consistent with the CSM RA. The review of good practices in the assessment of signal overrun risk and risk of train exceeding the end of movement authority will support the potential updating of requirements or guidance in the next version of RIS-0386-CCS.