

**Oliver Stewart**  
**RAIB Recommendation Handling Manager**



30 May 2024

Mr Andy Lewis  
Deputy Chief Inspector of Rail Accidents

Dear Andy,

**RAIB Report: Train struck and damaged by equipment case door in Watford tunnel on 26 October 2014**

I write to provide an update<sup>1</sup> on the action taken in respect of recommendation 6 addressed to ORR in the above report, published on 13 August 2015.

The annex to this letter provides details of actions taken in response to the recommendation and the status decided by ORR. The status of recommendation 6 is **'Closed'**.

We do not propose to take any further action in respect of the recommendation, unless we become aware that any of the information provided has become inaccurate, in which case I will write to you again.

We will publish this response on the ORR website.

Yours sincerely,

Oliver Stewart

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<sup>1</sup> In accordance with Regulation 12(2)(b) of the Railways (Accident Investigation and Reporting) Regulations 2005

## Recommendation 6

*The intent of this recommendation is for Network Rail to take action to reduce the risk of equipment being installed without contractors being aware of existing limitations on, or conditions of, its use.*

Network Rail should, in consultation with its suppliers, make improvements to its systems for product acceptance to ensure that all relevant information associated with those products, such as risk assessments, is accessible to potential users. The exercise should consider including a facility to enable each user to include information on its own application of the product that may be beneficial to future users.

### ORR decision

1. Network Rail state that they cannot close the recommendation as written (for reasons given below), but state that they have been able to demonstrate that the intent has been met by facilitating improved sharing of information between potential users of equipment such as lineside equipment cases. Network Rail have reviewed their product approval processes and consider them fit for purpose. Nevertheless, the product approval guidance has been subject to update.

2. The availability of supporting information to those designing new and revised products, and those reviewing variation to standards requirements was in place, but sharing of information has been improved by introduction of the Product Approval Hub (PAH). The PAH does not include risk assessments, as Network Rail consider clarity on the application restrictions is the prime information for those using the products. Other processes (such as competence management arrangements aimed at ensuring designers do not use equipment for the wrong application) are in place to support the intent of the recommendation.

3. Network Rail considered publication of relevant information, however this was met with resistance from the manufacturers on the basis that this would give others a competitive advantage. Such a system would also duplicate much of the Parts and Drawing system (PAD), which includes information on product constraints, but not where to use or not to use.

4. After reviewing the information provided ORR has concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, Network Rail has:

- taken the recommendation into consideration; and
- taken action to close it

**Status: Closed.**

### Previously reported to RAIB

5. On 3 August 2016 ORR reported the following:

ORR are content with the Network Rail response and the timescale they have provided. We have informed them that we will need evidence that their review includes all the elements in the recommendation.

### Update

6. On 4 October 2016 Network Rail provided the following closure statement and supporting evidence:



RAIB Watford Tunnel Rec 6 signed closure statement - Product Acceptance - Review of NR standards  
Watford Tunnel Rec 6 Minutes of meeting - Product Acceptance - Review of NR standards

7. On 5 March 2024 Network Rail provided the following additional closure information:



Supplementary information to support

## Previously reported to RAIB

### Recommendation 6

*The intent of this recommendation is for Network Rail to take action to reduce the risk of equipment being installed without contractors being aware of existing limitations on, or conditions of, its use.*

Network Rail should, in consultation with its suppliers, make improvements to its systems for product acceptance to ensure that all relevant information associated with those products, such as risk assessments, is accessible to potential users. The exercise should consider including a facility to enable each user to include information on its own application of the product that may be beneficial to future users.

### ORR decision

1. ORR are content with the Network Rail response and the timescale they have provided. We have informed them that we will need evidence that their review includes all the elements in the recommendation.
2. After reviewing the information provided ORR has concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, Network Rail has:
  - taken the recommendation into consideration; and
  - is taking action to implement it by 30 June 2016

**Status: implementation on-going. ORR will advise RAIB when actions to address this recommendation have been completed.**

### Information in support of ORR decision

3. On 9 March 2016, Network Rail provided the following initial response:

*Network Rail will undertake a review of specifications for undertaking and managing product acceptance applications. Particular consideration will be on controls in place for application restrictions imposed by the acceptance process, to ensure that all relevant information associated with those products, such as risk assessments, is accessible to potential users and can be clearly understood by Network Rail and suppliers considering application*

*of the product. This may include inclusion of product and applications specification in the acceptance information.*

*The review will be led by the STE product acceptance engineers, with support from an Investment Projects representative and suppliers.*

*Following the review, Network Rail will update the product acceptance procedures and specifications to adequately control the risks identified.*

4. On 13 April 2016 Network Rail wrote to ORR to confirm that the review had been undertaken on 31 March 2016 and the agreed actions were expected to be completed by the end of June 2016.