



U.S. Department
of Transportation

**Federal Railroad
Administration**

Administrator

**1120 Vermont Ave., NW.
Washington, DC 20590**

June 30, 2006

The Honorable Mark V. Rosenker
Acting Chairman
National Transportation Safety Board
490 L'Enfant Plaza East, S.W.
Washington, D.C. 20594

Dear Mr. Rosenker:

Thank you for your letter to the Federal Railroad Administration (FRA) concerning the issuance of National Transportation Safety Board's (NTSB) Safety Recommendations R-05-14 through R-05-17. These four new safety recommendations arose from the investigation of the collision of northward Norfolk Southern Railway Company (NS) freight train 192 with an unoccupied parked train (NS train P22), at Graniteville, South Carolina, on January 6, 2005. Train 192 encountered an improperly lined hand-operated switch that diverted the train from the single main track onto an industry track where the collision occurred. The collision and subsequent derailment caused a tank car containing chlorine to be breached which released chlorine gas. The locomotive engineer and eight other persons died as a result of the chlorine gas inhalation, and numerous members of the general public were taken to local hospitals complaining of respiratory difficulties.

The FRA has carefully reviewed these recommendations, and I am enclosing our formal response to each of them. FRA strongly supports the NTSB's interest in reducing the risk of a similar accident by addressing the underlying factors. We believe that the NTSB is wise in seeking measures that can prevent, or mitigate the effects of, such an occurrence.

Recommendation R-05-14 suggests providing crews with visual or electronic notice of any switch that is in other than normal position. Although we are not able to determine how the specific suggestions contained in the recommendation could be carried out in a cost effective and secure manner, we take this opportunity to update the NTSB on other actions we are taking to promote route integrity in non-signalized territory. We believe these actions deserve favorable consideration because of their effectiveness and compatibility with future safety improvements.

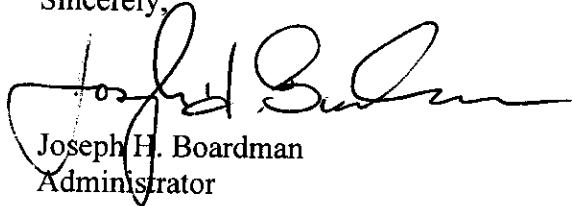
Recommendation R-05-16 asks FRA to require railroads to implement operation measures, such as positioning tank cars toward the rear of trains and reducing speeds through populated areas, to minimize impact forces from accidents and reduce the vulnerability of tank cars transporting chlorine, anhydrous ammonia, and other liquefied gases designated as poisonous by inhalation. The enclosed response explains why it would be imprudent and of dubious usefulness to require that the subject cars be placed at

the rear of trains. However, despite the fact that catastrophic releases are very rare events and practical impediments to speed restrictions are substantial, we recognize the need to examine the issue of train speed in non-signalized territory; and we are conducting a review that will consider the potential benefits and costs of slowing trains carrying certain toxic commodities. We will get back to you with the results of that review by this October.

Recommendation R-05-17 asks FRA to determine effective means of providing emergency escape breathing apparatus for all crewmembers on trains carrying hazardous materials that would pose an inhalation hazard. In response to this recommendation, FRA will begin a research effort this year to ascertain whether and in what way this might be accomplished.

However, I am very concerned that Recommendation R-05-15, which asks us to restrict trains operating in non-signalized territory to speeds that will allow them to be safely stopped in advance of misaligned switches, advances a concept that is impractical and contrary to safety. It is overbroad, in that it would apparently apply to all trains, regardless of lading. It would likely introduce unfavorable safety trade-offs, since it would exacerbate train handling challenges for locomotive engineers. Further, this recommendation fails to take into account the impact of disrupting train operations on the capacity of the Nation's intermodal transportation system. Although FRA normally looks forward to sustaining conversations regarding recommendations that cannot be immediately implemented, the subject recommendation is so remote from any action FRA could reasonably undertake that this will be our final response to it. Accordingly, for the reasons stated in the enclosure, FRA requests that this recommendation be classified "Closed—Reconsidered."

Sincerely,



Joseph H. Boardman
Administrator

Enclosures

1. Response to Recommendations R-05-14 through R-05-17
2. *Safe Placement of Train Cars* (Report to Senate Committee on Commerce, Science and Transportation and the House Committee on Transportation and Infrastructure., June 2005)