



WMSC Inspection Report 20250411B

ISSUED 4/14/2025

Inspection Details

Title: Contractor Roadway Worker Protection Training

Location: Carmen Turner Facility (T38)

Date of Inspection: 4/11/2025

Time of Inspection: 9:30am to 10:30am

Unannounced

Risk-Based (Corrective Action Plan C-0045)

Functional Area: Corrective Action Plan

Hazard Rating: 3C

Overview

On Friday April 11, 2025, the WMSC performed a risk-based inspection of the Contractor Roadway Worker Protection (CRWP) training class that was conducted at the Carmen Turner Facility (CTF). The objective of the inspection was to confirm that the participants of the CRWP training class receive the same consistent and standardized Roadway Worker Protection (RWP) course material offered by Metrorail's Technical Training and Development (TT&D) and the Safety and Readiness department and to verify that the performance-based objectives defined by Metrorail's Procedure Number 2710-3-01/02 Contractor Roadway Worker Protection Training section 6.5.9 Practical Assessments and described as "6.5.9.1. "A practical assessment shall be used for each participant to demonstrate safe working practices on the roadway are being followed. These objectives include:

- a) Demonstrating how to properly cross over third rail
- b) Demonstrating the proper hand signal for stopping a train"

This was a risk-based inspection based on finding 8 from the [2020 Audit of Roadway Worker Protection and Training](#). Finding 8 states, "The responsibility for RWP contractor training does not follow the RWP SOP Section 2.2."



Last year, on Wednesday, July 10, 2024, the WMSC conducted an inspection of a contractor RWP class at CTF. The inspection generated eight defects listed below:

1. Participants did not have the required safety footwear. Participants were observed wearing sneakers and dress shoes. Participants lacked Personal Protective Equipment (PPE).
2. On Wednesday July 10, 2024, WMSC Inspectors attended both the Level 1 initial internal and Level 1 initial contractor RWP classes. The Contractor class was completed approximately three hours faster than the internal RWP class. There is an inconsistency in training between internal and external RWP students. The Contractor class was approximately 2.5 hours and the internal RWP class was approximately 6 hours.
3. The participants did not demonstrate the required proficiency or knowledge to safely cross over the third rail. Although there is an inside and outside track setup available for RWP testing at the Carmen Turner Training Facility (CTF), students completed the class without performing the required practical assessment. The practical for CRWP requires successful crossing of the third rail to pass the class and this did not occur.
4. Retesting occurred simultaneously while the class was being instructed. Participants were required to take the retest assessment unsupervised at tables in the hallway which was disruptive to the learners.
5. Two of the retesting students finished the retest in five minutes. The participants were told by the instructor that completing the test that quickly was not possible since he had designed the assessment. This suggests that cheating is occurring during the CRWP class, and the assessment might be compromised.
6. Participants were not given **(Participant hand-outs)**.
7. All assessments were in a paper format.
8. The CRWP class did not follow the prescribed outline in CRWP SOP.

Subsequently, Metrorail mitigated all the identified defects.

All personnel, regardless of rank and title, shall be Roadway Worker Protection trained and qualified before entering the WMATA's roadway, as required by Cardinal Rule #1 of the RWP program. If personnel are not qualified in accordance with the governing Metrorail requirements the potential for injury or death increases. Therefore, the WMSC conducted the inspection on April 11, 2025, to confirm that the CRWP is being conducted following Metrorail requirements.

After concluding the inspection, the WMSC inspectors conducted a debrief with the Operating Practices Specialist, RWP, in accordance with Program Standard Section 6.F.1.

Defects and Corrective Actions

WMSC Inspections identify safety issues that may be classified as defects, findings, or recommendations. Findings and recommendations are defined by Program Standard Section 5.E.2 and 5.E.3 respectively. Ordinarily, issues identified in a WMSC inspection report are classified as



defects. Defects are specific safety issues of non-conformance/non-compliance that are identified and that require remedial action.

This inspection did not identify any findings or recommendations and therefore does not require a WMSC Corrective Action Plan in accordance with Program Standard Section 5.E.4.

Defect Observations and Determinations

The WMSC Inspector found that the training for this contractor RWP class complied with the requirements of Metrorail's RWP program.

Nevertheless, several participants were observed not wearing safety boots during the training. As noted above, this issue was observed in a previous WMSC inspection, in 2024. During the April 11 inspection, the WMSC inspectors asked the Metrorail instructor about the lack of protective footwear worn by the participants. The instructor stated that Metrorail is allowing class participants to wear non-compliant footwear since the participants were using a classroom replica instead of crossing an actual third rail. The Metrorail instructor added that the participants are not allowed to wear Crocs or sandals. To date, the WMSC has not obtained Metrorail written requirements that verify this statement.

Overall, the WMSC Inspectors report the course was well conducted, effective, and efficient. Class objectives were covered during the PowerPoint slide show and participant exercises were used to check for learning at each stage during the lecture. Additionally, participants used guides as they interacted with the lecture. An instructional prop made to represent the third rail was used to test participants' understanding and ability to safely cross the third rail.

This inspection identified no defects.

Next Steps

Please respond by **Thursday, April 17, 2025**, to acknowledge receipt.