



WMSC Inspection Report 20250911

ISSUED 9/15/2025

Inspection Details

Title: Roadway Worker Protection (RWP) Level IV Certification Training Inspection

Location: Carmen Turner Facility (CTF)

Date of Inspection: 9/11/25

Time of Inspection: 7:00am to 1:00pm

Unannounced

Risk-Based (Audit)

Functional Area: Roadway Worker Protection

Hazard Rating: 1B

Overview

On September 11, 2025, WMSC Inspectors performed an unannounced follow up roadway worker protection (RWP) records review and attended the practical exercise evaluation of the RWP Level IV Initial Class that began September 8, 2025, and concluded September 12, 2025, at the Carmen Turner Training Facility (CTF). The purpose of this inspection was to review training records for all level IV certifications and requalifications that were completed since the September 3, 2025, inspection (see WMSC Inspection Report 2025-09-03B) and evaluate the current RWP Level IV-Initial certification process.

This is a risk-based inspection based on an urgent hazard identified during the WMSC's Track, Structures, and Roadway Worker Protection Audit.¹ On July 10 and 11 of 2025, the WMSC visited the Carmen Turner Training Facility (CTF) where RWP training and qualification records are held (there are no electronic or redundant versions of these records). Currently, Metrorail has three levels of RWP qualification: level IV-qualified individuals are referred to as roadway workers in charge and directly ensure the safety of all work taking place in their respective work zone. While at CTF, the WMSC identified level IV RWP training records that did not support the level IV certification given to those individuals. The WMSC issued an urgent hazard notification to Metrorail on July 14 based on this information. As of July 15, there were 1,246 RWP level IV personnel. Since reporting this problem, Metrorail identified 192 level IV personnel who received certifications that do not conform to written requirements.

¹ Also discussed at the WMSC's [August 5, 2025 Public Meeting](https://www.youtube.com/live/pOI4Gyr_JZo?t=805s) (viewable at [youtube.com/live/pOI4Gyr_JZo?t=805s](https://www.youtube.com/live/pOI4Gyr_JZo?t=805s)).



On September 4, 2025, the WMSC issued a [finding](#) that Metrorail is not following its written process to ensure and document that its roadway workers in charge have demonstrated the knowledge and skills required to do their job safely. The corrective action plan development process associated with the September 4, 2025, finding is underway between the WMSC and Metrorail. Ultimately, as part of that corrective action plan, Metrorail will be re-training and re-qualifying all 192 personnel; however, in the interim, as a way of monitoring level IV roadway workers in charge, the WMSC is conducting a series of RWP risk-based inspections.

During this September 11 inspection, WMSC Inspectors reviewed training records from the September 10, 2025, Level IV-Requalification class and observed the practical evaluations for the September 8–12, 2025 Level IV-Initial class. The inspectors also reviewed the following procedures: SARE-05-0470 RWP Level IV Initial Practical Exercise Evaluation Work Instruction 8/29/2025; SARE-05-0464 RWP Level IV Initial Practical Exercise Evaluation Form IT Rev 0, 08/14/2025; SARE-05-0463 RWP Level IV Initial Practical Exercise Evaluation Form ETO Rev 0, 08/14/2025; SARE-05-0462 RWP Level IV Initial Practical Exercise Evaluation Form AMF Rev 0, 08/14/2025; and SARE-05-0219 Rev 0, 4/7/2025, which is the previous RWP Level IV Initial Practical Evaluation Form.

After concluding the inspection, the WMSC inspectors conducted a debrief with the Technical Training and Development Management and 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

On September 11, 2025, WMSC Inspectors announced their presence upon arrival on site at the Carmen Turner Training Facility (CTF) and requested the training records for review. The WMSC team discussed the inspection activity with the Metrorail Technical Training and Development Manager and informed the instructor of the inspection.



Practical Evaluation Review

Observation 1

WMSC Inspectors observed a candidate for the level IV Roadway Workers in Charge (RWIC) Initial Class take the practical examination. The practical exam entails setting up a work zone site on the training facility tracks at CTF to enable the practical portion of the level IV certification exam. Once setup, the student then identifies all the non-compliant roadway worker protection components that were laid down or missing, and explains what is required to set up a track work zone correctly in accordance with roadway worker protection rules outlined in the Metrorail Operating Rulebook. The level IV practical qualification additionally requires that each student candidate prepare and perform a Roadway Job Safety Briefing and demonstrate the required knowledge to properly set up and take down a work area.

Candidates are evaluated on the following categories:

1. Proper Personal Protective Equipment (PPE) Check
2. Road Job Safety Briefing
3. Setup evaluation

The below tables demonstrate changes WMSC Inspectors identified between the prior version of the practical evaluation exam and the practical evaluation exam being used during the September 11, 2025, inspection.

Job Safety Briefing Evaluation Changes – Inaccessible Track (IT)		
Documents Compared	SARE-05-0219 Rev 0 – Previous RWP Level 4 Initial Practical Evaluation Form	SARE-05-0464 Rev 0- RWP Level 4 Interim Requalification Form
Change identified	Line 4, # of Workers in Crew	Removed from practical
Change identified	Line 5, Track #1 or Track #2	Removed from practical
Change identified	Line 7, Direction of Traffic	Removed from practical
Change identified	Line 9, Red Hot Spots Safety Protocols	Removed from practical
Change identified	Line 11, Block calls and prohibit exits	Removed from practical
Change identified	Line 12, Watchman/Lookout	Removed from practical
Change identified	Line 19, Questions	Removed from practical



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Roadway Worker Protection Setup Evaluation Changes – Inaccessible Track (IT)		
Documents Compared	SARE-05-0219 Rev 0 – Previous RWP Level 4 Initial Practical Evaluation Form	SARE-05-0464 Rev 0 – RWP Level 4 Initial Practical Exercise Evaluation Form IT
Change identified	Line 1, 100% repeat back	Removed from practical
Change identified	Line 2, Request BC/PE/CAS within Working Limits	Removed from practical
Change identified	Line 4, Hot Stick/ Locations – CM given to ROCC	Removed from practical
Change identified	Line 9, Use of Watchman/ Lookout	Removed from practical
Change identified	Line 12, Clear Track with proper protocol (Watchman/Lookout)	Removed from practical
Change identified	Addition added to practical	Form O Logbook and Quick Access Guide

Job Safety Briefing Evaluation Changes – Exclusive Track Occupancy (ETO)		
Documents Compared	SARE-05-0219 Rev 0 – Previous RWP Level 4 Initial Practical Evaluation Form	SARE-05-0464 Rev 0- RWP Level 4 Interim Requalification Form
Change identified	Line 4, # of Workers in Crew	Removed from practical
Change identified	Line 5, Track #1 or Track #2	Removed from practical
Change identified	Line 7, Direction of Traffic	Removed from practical
Change identified	Line 9, Red Hot Spots Safety Protocols	Removed from practical
Change identified	Line 12, Watchman/Lookout	Removed from practical
Change identified	Line 19, Questions	Removed from practical



Roadway Worker Protection Setup Evaluation Changes – Exclusive Track Occupancy (ETO)		
Documents Compared	SARE-05-0219 Rev 0 – Previous RWP Level 4 Initial Practical Evaluation Form	SARE-05-0464 Rev 0 – RWP Level 4 Initial Practical Exercise Evaluation Form IT
Change identified	Line 1, 100% repeat back	Removed from practical
Change identified	Line 2, Request BC/PE/CAS within Working Limits	Removed from practical
Change identified	Line 4, Hot Stick/ Locations – CM given to ROCC	Removed from practical
Change identified	Line 9, Use of Watchman/ Lookout	Removed from practical
Change identified	Line 12, Clear Track with proper protocol (Watchman/Lookout)	Removed from practical

Job Safety Briefing Evaluation Changes – Advanced Mobile Flagger (AMF)		
Documents Compared	SARE-05-0219 Rev 0 – Previous RWP Level 4 Initial Practical Evaluation Form	SARE-05-0464 Rev 0- RWP Level 4 Interim Requalification Form
Change identified	Line 4, # of Workers in Crew	Removed from practical
Change identified	Line 5, Track #1 or Track #2	Removed from practical
Change identified	Line 7, Direction of Traffic	Removed from practical
Change identified	Line 9, Red Hot Spots Safety Protocols	Changed from Red hot spots to hot spots
Change identified	Line 11, Block calls and prohibit exits	Removed from practical
Change identified	Line 19, Questions	Removed from practical



Roadway Worker Protection Setup Evaluation Changes – Advanced Mobile Flagger (AMF)		
Documents Compared	SARE-05-0219 Rev 0 – Previous RWP Level 4 Initial Practical Evaluation Form	SARE-05-0464 Rev 0 – RWP Level 4 Initial Practical Exercise Evaluation Form IT
Change identified	Line 1, 100% repeat back	Removed from practical
Change identified	Line 2, Request BC/PE/CAS within Working Limits	Removed from practical
Change identified	Line 4, Hot Stick/ Locations – CM given to ROCC	Removed from practical
Change identified	Line 9, Use of Watchman/ Lookout	Removed from practical

At the conclusion of each assessment, the instructor completed an RWP Level IV Requalification Practical Exercise Evaluation Form, and each student candidate signed their completed form.

Training Records Review

During this inspection, Metrorail management observed the training records document review as it was performed by the WMSC. This review identified anomalies that were immediately raised and discussed with Metrorail management.

Observation 2

One anomaly was first identified by the use of two different colors of pen ink on the evaluation form. WMSC Inspectors learned there were two different instructors during that specific September 9, 2025, level IV requalification practical evaluation. But that evaluation was only signed by one instructor, and the form only includes provision for one signature (the prior version of the form provided for two signatures to account for there being two instructors). Therefore, the completed form did not capture the other instructor who was part of that evaluation.

Observation 3

Of the 19 training exams that were reviewed by WMSC Inspectors, four exhibited nearly identical changes: The instructor originally marked a student's answer to one specific part of the evaluation as incorrect, but from varying discrepancies on the Practical Exercise Evaluation Form, the incorrect mark was then crossed out to reflect a passing or correct answer for that section of the exam in these four exam records out of the 19 reviewed.



Observation 4

One examinee was recorded on the roster as unsuccessful, but the actual, completed practical Exercise Evaluation Form was not included with the class records. WMSC Inspectors were unable to locate the unsuccessful exam, and Metrorail advised the individual walked out with the exam after unsuccessful completion. This was not documented in the file; however, the manager had not yet gone through the file to verify compliance.

Next Steps

Please respond **by Thursday, September 18, 2025**, to acknowledge receipt and to convey responses to the WMSC regarding what, if any, actions will be or have been taken in response.