



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

The Administrator

400 Seventh Street, S.W.  
Washington, D C 20590

FEB 9 1994

The Honorable Carl W. Vogt  
Chairman  
National Transportation Safety Board  
Washington, DC 20594

Dear Chairman Vogt:

This letter responds to safety recommendation R-92-23 which is the result of a National Transportation Safety Board special investigation on the inspection and testing of railroad tank cars. The recommendation states as follows:

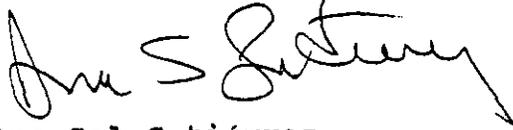
Develop and promulgate, with the Federal Railroad Administration (FRA), requirements for the periodic testing and inspection of rail tank cars that help to ensure the detection of cracks before they propagate to critical lengths by establishing inspection intervals that are based on the defect size detected by the inspection method used, the stress level, and the crack propagation characteristics of the structural component (requirements based on a damage-tolerance approach).

On September 16, 1993, RSPA and FRA published a notice of proposed rulemaking (NPRM) under docket HM-201, Detection and Repair of Cracks, Pits, Corrosion, Lining Flaws, Thermal Protection Flaws, and Other Defects of Tank Car Tanks, which addresses the recommendation in R-92-23. Section 180.509 addresses the requirements for inspection and test of specification tank cars including the frequency of inspection and tests, and the types of inspection and test methods to be used. Alternative inspection and test procedures and test intervals are also proposed in this section based on a damage-tolerance fatigue evaluation, when the evaluation is examined by the Association of American Railroads Tank Car Committee and approved by the Associate Administrator for Safety of the FRA.



In light of this responsive action, RSPA requests that safety recommendation R-92-23 be classified as "Open-Acceptable Action" pending publication of the final rule.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ana Sol Gutierrez". The signature is written in dark ink and is positioned above the typed name.

Ana Sol Gutiérrez  
Acting Administrator