

OCT - 7 1996

The Honorable Jim Hall
Chairman
National Transportation Board
Washington, DC 20594

Dear Chairman Hall:

The purpose of this letter is to report the status of RSPA's actions on rail-related NTSB recommendations R-85-61, R-92-23, and R-95-11. These recommendations have been addressed in a recent RSPA rulemaking in docket HM-175A/201.

R-85-61

This recommendation urged RSPA in consultation with the Federal Railroad Administration (FRA) and the Association of American Railroads to conduct a full testing and evaluation program to develop a headshield to protect DOT specification aluminum tank car ends from puncture and mandate installation of the headshield at an early date. The testing and evaluation program has been completed and the recommendation was addressed in a final rule, September 21, 1995, under docket HM-175A. Section 173.31(b)(3) requires a full tank-head puncture-resistance system on aluminum tank cars when such cars are used to transport hazardous materials. As a result of this positive action RSPA requests that R-85-61 be classified as "Closed-Acceptable Response".

R-92-23

This recommendation urged RSPA to develop and promulgate, with the 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 length by establishing inspection intervals that are based on the defect size detectable by the inspection method used, the stress level, and the crack propagation characteristics of the structural components (based on a damage-tolerance approach). This recommendation was addressed under docket HM-201 in sections 180.509 (c) Frequency of inspection and tests, (e) Structural integrity inspections, (f) Thickness tests, and (k) Alternative test procedures, which includes damage-tolerance fatigue evaluation.

In the preamble of Docket HM-201, RSPA and FRA acknowledged that it would take years to fully implement a damage-tolerance program including the acquisition and analysis of additional data based on test evidence and actual experience of the tank car fleet. We stated that we will continue to work with industry groups to develop an inspection and testing program based on damage-tolerance principles. As a result of this positive action, the NTSB classified FRA safety recommendation R-92-22 (which is similar to RSPA's R-92-23) as "Open-Acceptable Response". In light of this action, RSPA requests that R-92-23 continue to be classified as an "Open-Acceptable Response" pending further implementation of the recommendation.

R-95-11

This recommendation urged RSPA, in cooperation with the FRA, to require that the shipper or party using a tank car to transport a material corrosive to the tank to determine the periodic interval and testing techniques for linings and coatings, and to require that this information be provided to parties responsible for the inspection and testing of tank cars. The objective of recommendation R-95-11 was initially addressed under docket HM 201 in section 180.509(c)(3)(iii)(B). It required that the supporting documentation used to make the inspection and test interval and test technique determinations be made available to the FRA upon request. To be fully responsive to recommendation R-95-11, this section has been amended in the HM-175A/201 corrections document published June 26, 1996. The amendment requires that "...the owner of the lining or coating shall provide the periodic inspection interval, test technique, and acceptance criteria for the lining or coating to the person responsible for qualifying the lining and coating." In light of this responsive action, we request that R-95-11 be classified as "Closed Acceptable Response".

Sincerely,

Dr. D.K. Sharma