U.S. Department
of Transportation

**Federal Railroad
Administration**
1200 New Jersey, Avenue, SE
Washington, DC

Date: January 9, 2020

From: Lisa Matsinger, Railroad Safety Specialist (HM)

To: Mark Maday, RRS-12 Staff Director (HM)

Re: Norfolk Southern Corporation (NS) Headquarters Audit (January 2020)

An audit of the Norfolk Southern Corporation (NS) was conducted from January 5 to January 9, 2020, in Atlanta, GA. The scope of the audit included review of the company's security plan, emergency response/oil spill plans, hazardous materials training, routing, DOT Special Permit 20534 (ETS) and One Time Movement Approvals (OTMAs). Participants in this audit included: Mark Maday, FRA- RRS-12 Staff Director, PHMSA Program Analyst Nicole Anderson, FRA-RRSI Quintyn Grant and FRA-RRSS Lisa Matsinger. A synopsis of audit items is as follows:

Security Plan

NS has multiple plans which cover various aspects of DOT's security plan requirements found in 49 CFR §172.800 through §172.804. These are the Facility Security Plan, System Security Plan with Appendices for each of the 20 High Threat Urban Areas (HTUAs) served, Port Security Plan with Appendices for 6 Ports and the Association of American Railroads (AAR) Rail Industry Plan.

Each were reviewed to determine NS's compliance with the Personnel, Unauthorized Access and En-route Security components of DOT Security Plan requirements. Associated programs

including NS's Transportation Worker Identification Credential (TWIC), E-Railsafe Contractor and employee background check systems were reviewed as well.

The plans were current as of January 2018, October 2019 and November 2019. The Director of Infrastructure Security stated his intention to reissue all aspects of the Security Plan in 2020 with stricter document control of hard copies by limiting these to only five key personnel. Levels of access via the NS computer system will be reorganized per new job titles created in past two years. NS Police functions remain steady since employment in 2019 was stable with few budget cuts. Required correspondence with fusion centers, state/local governments and Native American Tribes was available when requested.

No non-compliance issues were found with DOT Security Plan Requirements.

Emergency Response/Oil Spill Response Plans

NS provided a presentation on the inter-activity of its emergency, oil spill and hazardous materials response programs involving both yard evacuations and line of road situations. Resource information ranging from mapping with multiple situation overlays, chemical response, emergency responder information, personal protective equipment and compatibility was shown to be available.

Hazardous Materials Training

Training Materials were reviewed for Transportation, Engineering, Mechanical and Clerical personnel. Topics covered were General Awareness/Familiarization, Function Specific, Safety, Security Awareness and In-depth Security as required of 49 CFR § 172.704.

NS is transitioning most of its training to a new learning management system. Current records and those in the next year will reside in two different systems including the original mainframe computer until transition is complete. Certain recordkeeping requirements were discussed for new system.

NS has identified 130 managers across its system for In-depth Security Training.

There was no issue with NS providing records when requested.

Routing

NS uses the Rail Corridor Risk Management System (RCRMS) managed by Factor. A sample of rail routes and their associated safety/security risk scoring were examined with no indications of non-compliance with the 49 CFR §172.820 Routing Requirements. System usage issues were discussed to ensure that system continues to meet the rail carrier's needs.

During this audit FRA requested clarification on the departmental roles procedures/measures in place to meet 49 CFR § 172.820(h) requirements for handling delays in transit.

DOT Special Permit 20534 (ETS)

Aspects of the special permit DOT SP-20534 issued to ETS involving Methane shipments that may involve rail transportation via NS were discussed.

Three potential sample routes were presented. The NS origin-destination pairs shown were [Binghamton (NY) to Allentown (PA) and eastward], [Binghamton (NY) to Enola (Harrisburg, PA area) and eastward] and Binghamton (NY) to Buffalo (NY) then Conway (PA) and eastward. The first two routes scored with almost equal attractiveness while the third route was not as desirable.

The initial origin point per the special permit is on the Lehigh Railway, a short-line railroad leasing trackage from NS, in Wyalusing, PA. Some en-route trackage is owned by the Reading Blue Mountain & Northern Railroad. The final destination is depicted as Conrail Shared Assets, a railroad partially owned by NS, in Gibbstown, NJ. The Lehigh and Conrail portions of route may require additional routing analysis.

Yard evacuation plans were reviewed for Sayre, PA; Binghamton, NY; Allentown, PA; Harrisburg, PA and King of Prussia, PA (Abrams Yard). New York, Pennsylvania and New Jersey emergency response were also checked.

NS hazardous materials personnel stated their willingness to assist special permit grantee ETS in its educational endeavors involving potential railcar movements across its system.

One Time Movement Approvals (OTMAs)

A sample of waybills were examined to see if grantee input correct information required of FRA's One Time Movement Approval system concerning shipping papers and car routing. Additional car movement records were requested.