

23th January 2017

Subject: Change to WPP template which now requires CEM to approve.

We have received several queries regarding the change to the WPP template which now requires the CEM to 'approve' the plan. The comments received have been regarding:

1. The CEM will not have the time to approve all the WPPs as there are too many WPPs on a large project.
2. The CEM is not competent in all disciplines (normally only one) so this will result in WPPs for specific disciplines only having one competent person reviewing the WPP
3. There are not enough people at the competency level required by NR/L2/INI/02009 to be a CEM. With the current number of CEMs we have, the required level of attention necessary to approve a WPP with the volume of WPP's being produced cannot be achieved.

Please find below the response from the working group:

1. You must detail who will sign off and how you will manage WPPs in the CPP; refer to CPP template section 3.4 and 5.2.
2. Within table 3.4 you are able to detail discipline specific CRE's. The CEM shall retain accountability for the WPP's while s/he is able to formally nominate responsibility to a discipline competent staff. This management requirement should be determined at the CPP stage when scheduling and outlining WPP's and risk profiling the 'significant WPP' schedule.
3. Section 10 NR/L2/OHS/0044 gives requirements for "Competence requirement to sign off CPPs, WPPs and TBSs". The production and approval of WPPs should be compliant with this section.

The rationale for the change is given below:

1. In projects where the work primarily involves a single technical discipline there may also be a risk the full impact of the work on another part of the railway system is not fully appreciated or suitably controlled. The appointment of a CEM with knowledge of the railway systems and their interrelationships allows these risks to be identified and the appropriate control measures put into place.
2. The CEM must manage the risk and impact of any particular activity on all affected technical disciplines. This risk may be transient and only materialise during a particular point during the construction phase of a project as it may be related to the method of work. Examples may include:

- Risks arising from working on or around HV cable routes, buried services, or live equipment that may directly or indirectly be impacted (i.e. access routes or position of a HIAB/scaffold to work on trackside apparatus).
- Impacts on track integrity (i.e. running plant on the four foot or cess which damages components).
- Temporary instability of structures (i.e. excavations at the toe of an embankment to allow access for plant or to allow the 'levelling off' a new cable route / positioning of access scaffolds on potentially unstable structures or earthworks/ drilling or chasing of structural members to allow the routing of a temporary feeding arrangements for electrical power)
- Reduced signal sighting, platform clearances, clearances to OLE (i.e. the placement of formwork / temporary props /access scaffolds/barriers/fences)
- Scaffolding, temporary walkway barriers, access ramps, metal plates to cover holes where OLE induction has not been considered or else where the DC / AC earthing affects have not been accommodated.

The above examples are based on experience where the level of detail in the design, if one was produced covering the work element, or the CPP was not sufficient to identify the work package/activity risk. In these instances the work was deemed not complex (no significant risk) and as a result the WPPs did not identify the control for these interface risk.

The controls measures to address these risks must be documented in the WPP / Task Briefings. The effort to meet this requirement will increase on projects that are subject to significant / late change, those delivered to challenging timescales, projects with differing design maturity across the technical disciplines, or those with complex technical interfaces.

3. The WPP, and the subsequent Task Briefings are produced to allow the delivery team to instruct individuals who are physically undertaking the work on how they will be implementing specific controls that manage risks which are identified in a variety of technical (and non-technical) documents. If this information is not suitably captured and communicated in a comprehensible manner, then it is likely these controls will be inadequate. If the measures set out in the WPP / Task Briefing Sheets have to change then the impact of any controls that are in place to deal with cross discipline risks needs to be managed.

Subject to the above CEM management accountability requirements being met, the signature of the CRE on a WPP is acceptable so long as the level of involvement from the CEM can be evidenced by other associated documentation. NR/L2/INI/02009 generally deals with this risk through the appointment of CEMs and the use of cross discipline reviews (IDC). The outputs of this, signed off by the CEM, forms part of the evidence this is being satisfactory considered.

NR/L2/OHS/0044 templates are not mandated, however the templates are industry good practice, and specify the minimum mandatory requirements. You can adjust the templates; add extra sections and columns according to the needs of your business/project. Variations from these templates must be controlled as per section 12 NR/L2/OHS/0044.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Ty Qureshi".

Ty Qureshi
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Safety, Technical and Engineering