



Surveillance
Safety case
Porto Santo radar replacement

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0 Document Data

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0.2 Document Parts List

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1.00	19-03-01	Approved version.	Paula Santos	Minor changes.

0.4 Document Build Instructions

This document makes extensive use of word automations for cross referencing and traceability.
The electronic version of this document is available in the following CVS repository:

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0.5 Document Approval

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1 Introduction

The aim of this safety case is to demonstrate that the upgrade of the Porto Santo radar is a safe change. The upgrade of the Porto Santo radar to Mode S is performed in two phases, the first of which was already successfully completed. The second phase requires a long period of unavailability of this radar.

Chapter 1 – this one – introduces the document, presents the scope of the work, the assumptions and constraints.

Chapter 2 – details the change scope, its impact and associated hazards.

Chapter 3 – contains the argument and sub-arguments in a structured way used to demonstrate that the defined safety criteria are met.

Appendix A - is a compliance matrix between the requirements in regulation 1035/2011, Annex II paragraph 3.2 – "*Safety requirements for risk assessment and mitigation with regard to changes*", and the approach followed in the development of this safety case.

Appendix B - is a compliance matrix between the requirements in regulation 2017/373 requirements, its Accepted Means of Compliance and Guidance Material and the approach followed in the development of this safety case.

The document contains boxes of different colours, the blue ones describe the process followed, the yellow ones refer safety requirements and the green ones include de actions that have already been performed.

1.1 Goals

This safety case presents a structured argument that the upgrade of the Porto Santo radar will be free from unacceptable risk and that actions have been taken to minimize risk as much as possible.

It will cover the safety assessment requirements as defined in regulation (EU) 1035/2011 (ref. [7]) and regulation (EU) 2017/373 (ref. [8]), except for the definition of safety objectives and safety criteria (ATS.OR.210).

The compliance matrixes can be found in Appendix A - Traceability to regulation EU 1035/2011 and Appendix B - Traceability to regulation 2017/373 AMC & GM.

1.2 Scope

This safety assessment shall cover:

- The change associated with the RAPOSA project, i.e. the upgrade of Porto Santo radar including the transition phases and the operational usage;
- The interfaces and interactions between the Porto Santo radar and the remainder of the functional system and its operating context, including airspace procedures.
- The planned degraded modes of operation of the functional system, i.e. the unavailability of the radar during the upgrade works and the evaluation;
- Hazard identification
- The safety criteria (*initial approach*)
- Risk analysis, evaluation and mitigation
- Specification of monitoring criteria

1.3 Assumptions

No changes will be made to the data displayed to ATCO, i.e. no specific mode S information will be provided.

1.4 Constraints

Porto Santo radar is the only surveillance means covering the whole Madeira sector. Adjacent centres rely on Porto Santo data for their surveillance services.

1.5 Glossary

1.5.1 Acronyms

a/c	Aircraft
ACC	Area Control Centre
ADS-B	Automatic Dependent Surveillance - Broadcast
APP	Approach Control
ASTERIX	All Purpose Structured EUROCONTROL Surveillance Information Exchange A standard data format used for the exchange of surveillance data.
ASO	Avaliação de Segurança Operacional
ATCO	Air Traffic Controller
OSD	Operational Services and Environment Description
SSR	Secondary Surveillance Radar
WAM	Wide Area Multilateration

1.5.2 Definitions

From regulation 1035/2011:

<i>safety assurance</i>	<i>all planned and systematic actions necessary to provide adequate confidence that a product, a service, an organisation or a functional system achieves acceptable or tolerable safety;</i>
<i>safety objective</i>	<i>a qualitative or quantitative statement that defines the maximum frequency or probability at which a hazard can be expected to occur;</i>
<i>safety requirement</i>	<i>a risk-mitigation means, defined from the risk-mitigation strategy that achieves a particular safety objective, including organisational, operational, procedural, functional, performance, and interoperability requirements or environment characteristics;</i>

From regulation 2017/373:

<i>hazard</i>	<i>any condition, event, or circumstance which could induce a harmful effect;</i>
<i>functional system</i>	<i>a combination of procedures, human resources and equipment, including hardware and software, organised to perform a function within the context of ATM/ANS and other ATM network functions;</i>

For hazards:

Not provided	Missing or too late.
Incorrect	Data received at destination is wrong. Might be used by destination as correct. It is also incorrect when read back is not detected as wrong.
Corrupted	Data received at destination is: <ul style="list-style-type: none"> • Not readable, • Not understandable or • Immediately detected as wrong
Misdirected	Is received as an incorrect message by the unintended receiver and is also not provided to the intended destination.

1.6 References

Ref.	Document
[1]	Santos, P. L. C. T., Monteiro, P. A. A., Studic, M., & Majumdar, A. (2017). A methodology used for the development of an Air Traffic Management functional system architecture. (https://doi.org/10.1016/j.res.2017.05.022)
[2]	2000.R007.482 - ACC Lisboa OSED Version 1.00 from 2013-06-28
[3]	2000.OSED.800 OSED Madeira Tower Version 1.00, 2017-04-03
[4]	9090.R029.030 - ARTAS comparative evaluation without Porto Santo radar Version 1.00 from 2017-07-03
[5]	ASO Operação degradada no sector Madeira (WAM Madeira) Versão 2.0 de 2018-04-05
[6]	ASO - FPL Track - Lisboa FIR Versão 4.0 de 2018-06-07
[7]	COMMISSION IMPLEMENTING REGULATION (EU) 1035/2011 "common requirements for the provision of air navigation services"
[8]	COMMISSION IMPLEMENTING REGULATION (EU) 2017/373 "common requirements for providers of air traffic management/air navigation services and other air traffic management network functions and their oversight"
[9]	Safety Case Development Manual (Available at EUROCONTROL)
[10]	IS 079/18/CONLIS de 18-04-18 Reciclagem: ATC-TPC1-LIS e ATC-TPC2-LIS Treino em Procedimentos de Contingência. Prestação de Serviço de Controlo de Tráfego Aéreo em Ambiente de Contingência no Sector Madeira da RIV de Lisboa
[11]	INFO 084/CONLIS/18 AIP AMDT: AIRAC 003-18 e AIP SUP: 032/2018 (ATS Contingency Routes For Madeira Sector Due to Radar Inoperative)

2 Change analysis

Define change steps:

- 1 – Identify the change scope
- 2 – Identify change impact
- 3 – Describe planned degraded modes

This change includes the upgrade of the Porto Santo radar to Mode S and all the adaptations required in the functional system to integrate this source of surveillance data.

Safety assessment steps:

The following steps will be performed for both nominal and planned degraded modes

- 1 – Determine impact on borders of the functional system
- 2 – Identify new hazards and assess impact on existing hazards
- 3 – Identify possible causes; e.g. enabler problem (wrong implementation)
- 4 – Define mitigations for the identified causes

The change analysis process can be seen as a sequence of activities as depicted in the following image:

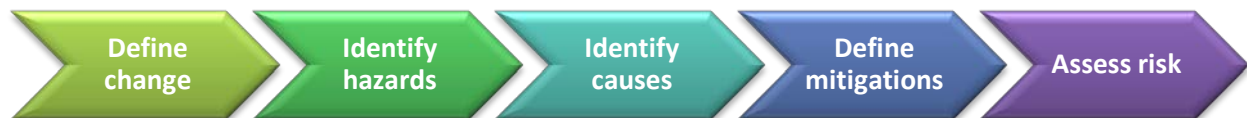


Figure 1: Change assessment process

The analysis is supported by the use of the ATM model MARIA. The model is used as a checklist to help the analyst identify the change scope and its impact in the ATM functional system. The development of this model started in 2012 and has already involved over 100 people in its development and validation. Every time it is used conveys an additional validation activity and an opportunity for improvement. Its hierarchical structure allows experts to focus on their area of expertise, ignoring the global view which is already captured in the model.

Below is a brief description of the model used in this analysis, using information from [1], which should be consulted for more in depth information on this ATM model.

The Air Traffic Management (ATM) system provides a safe, economical, efficient, dynamic and integrated management of air traffic and airspace through the collaborative integration of humans, infrastructure (technology and facilities) and organisations. At present, it is widely accepted that the ATM system is one of the leading complex socio-technical systems in terms safety performance. The Model of ATM used was developed with the aim of providing a sound base for system analysis, including safety, namely by describing the whole system and the interdependencies between its functions. It was developed using a hybrid methodology that integrates two well-known methods for qualitative data analysis – Template Analysis, and for functional modelling – Structured Analysis and Design Technique (SADT). Template Analysis was used to analyse the collected qualitative data that was further organised using the SADT, into the ATM functional system architecture.

The scope of MARIA, defined prior to the study, was to comprise all the ATM functions under the responsibility of the ANSP as illustrated in Figure 2: ATM Model scope. These include all the functions necessary to ensure a continuous, safe, efficient and cost-effective ATM services, by all the airspace sectors, to all the aircraft. Therefore, all of the services that are not within the responsibility of NAV Portugal (i.e. inputs and outputs originating from an aircraft or an external organisation such as the International Civil Aviation Organisation (ICAO), EUROCONTROL or other ANSPs) are out of the scope and belong to the model's exterior.

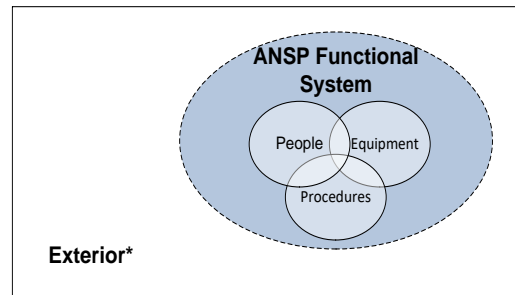


Figure 2: ATM Model scope

The high level view of the ATM model is depicted in Figure 3: ATM Model high-level functions . It comprises 9 functions supported by a 10th function which covers all that is needed to maintain the service provision infrastructure including, among others, the management of human resources, defining procedures, maintaining and replacing equipment.

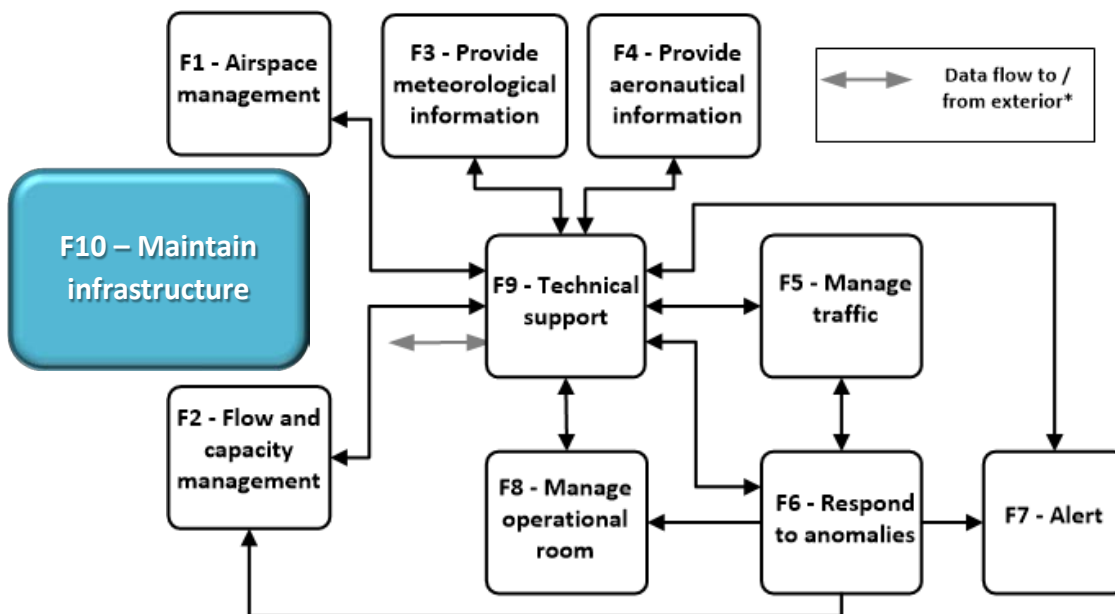


Figure 3: ATM Model high-level functions

MARIA attempts to provide a system description, covering people, procedures, equipment, regulation and the external environment. It describes both the system functions and the architecture with all its mechanisms of the Lisbon Flight Information Region (FIR). However, following the processes of internal and external validation it can be stated that this functional model can be extended to a generic ATM system with small adaptations, requiring the system architecture to be adapted to local systems, human tasks and their organization.

Due to the complexity of the system, both top-down and bottom-up coding was carried out with the aim of developing a comprehensive ATM system architecture. Initially, a top-down approach was used to derive a functional system description. During the interviews, the details were captured and added to the top-level structure using a bottom-up approach.

In light of the information flows gathered through the interviews, functions and their couplings were further combined, divided, modified, refined and amended. Hierarchical relationships that explain functional substructures and couplings between the functions were established. For instance, during this process, an additional top-level function was created, function F-10 Maintain Infrastructure. The new function was deemed necessary to account for the support of the remaining nine functions (belonging to the top-level of the MARIA model hierarchy) in the provision and maintenance of required infrastructural resources (e.g. to keep all the internal documentation up to date).

Due to the complexity of the MARIA model in the SADT format, it was deemed necessary to code it into an electronic readable language for the purpose of assuring its consistency and completeness. The MARIA framework offers the following automated functionalities: loading, checking, filtering, and documentation production. The automatic generation of documentation creates graphics, web pages in html format, and open document format. The figures used in this document to represent the functions are extracted from the html model's representation.

2.1 Change scope

Identify the change scope:

The MARIA model covers the whole scope of NAV Portugal ANS and ATM services and can be considered complete at each level of detail. Each NAV Portugal unit has its own model instance.

To ensure that the scope of the change is completely and correctly identified, it is described by pin-pointing the elements of the MARIA model for NAV Portugal that are changed.

The next step is to identify all the units that are affected by the change. This is done by checking the presence of the changed elements in the different unit model instances. In addition expert judgement is used to complement and validate the results.

The impact on the specific units is made explicit and covered in the global assessment.

2.1.1 Changed components

Conventions:

- Orange arrows identify impacted elements
- Orange boxes mark affected functions
- Purple boxes identify impacts to elements outside the functional system
- Red arrows identify potential degraded modes

The scope of this change is F-9.4.2.1: Sensor & Local Tracking, enabler Radar Porto Santo.

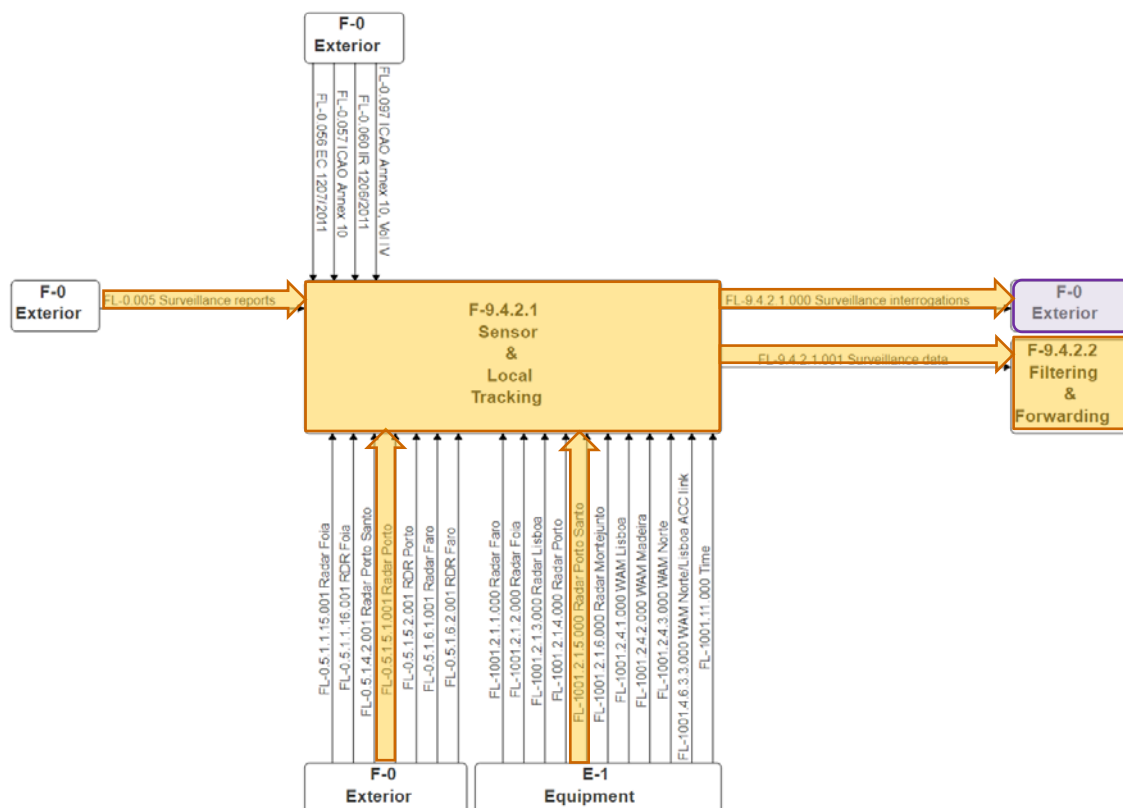


Figure 4: Scope of the change

The use of Mode S interrogations will affect the outputs of this function to Exterior – the aircraft and the inputs from the aircraft which will now respond with Mode S replies, if capable.

Note: The changes to the ATM systems, although addressed in this safety case, are outside the scope of the RAPOSA project.

2.1.2 Affected units

The Porto Santo radar is an enabler of the function F-9.4.2: Ensure Air Surveillance in the following units:

- Lisboa ACC
- Madeira Tower
- Santa Maria ACC

It is also used by the following adjacent ANSPs: ENAIRE and ONDA.

Except for the Madeira Tower, where it is used for approach control, the information from Porto Santo radar is used to provide surveillance service for en-route control. The separation minima applied is 8NM in the Madeira sector and TMA.

In the areas under the responsibility of NAV Portugal the traffic density is low.

The geographical area affected is represented in the following picture:

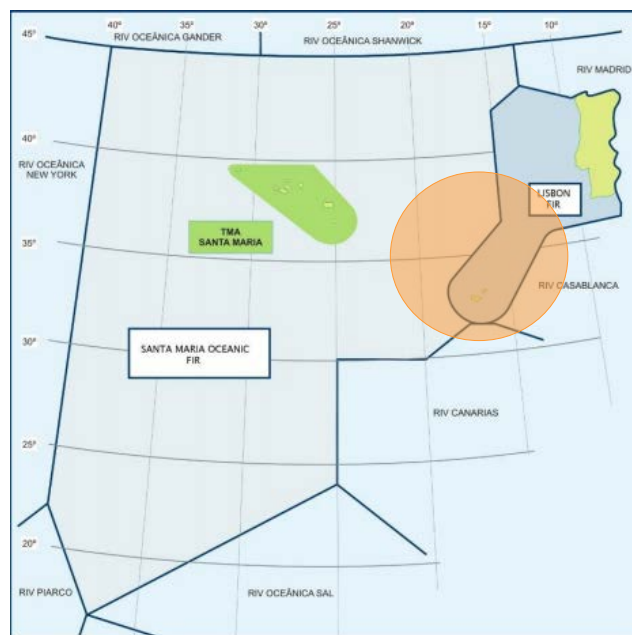


Figure 5: Affected areas

As the maintenance of Porto Santo radar is ensured by the team from Porto Santo tower, this unit will also be impacted. Training on the new radar is required for the Porto Santo maintenance team.

R1. The new Porto Santo maintenance team shall be trained to maintain the new radar.

2.1.3 Affected interfaces and interactions

Identify change impact:

The change impact is assessed using the MARIA model as a representation of the existing functional system. The following approach is followed:

1. One by one, select each output marked as affected in the scope identification;
2. If the output is to exterior assess the impact on the external elements, e.g. aircraft or adjacent units.

3. Iteratively follow the flow of information through the impacted functions until it can be demonstrated or assumed that the output of the function under analysis is not changed;
4. Continue until all flows have been traced to the end, either inside the NAV Portugal or to the exterior.
5. Assess the change impact on all the traversed, i.e. impacted, functions.
6. If the output of the function under analysis is not changed, assess the possible degraded modes.

2.1.3.1 F-9.4.2.1: Sensor & Local Tracking

The change to F-9.4.2.1: Sensor & Local Tracking consists of:

- Replacement of the radar antenna and its processing units

The change to F-9.4.2.1: Sensor & Local Tracking will directly impact:

- Exterior - Aircraft
- F-9.4.2.2: Filtering & Forwarding

Interface: F-9.4.2.1: Sensor & Local Tracking to exterior

The use of Mode S interrogations will affect the outputs of this function to Exterior – the aircraft, and the inputs from the aircraft which will now respond with Mode S replies, if capable.

R2. The new Porto Santo radar shall detect cooperative non Mode S equipped aircraft.

The Mode S ground interrogator provides surveillance of both Mode A/C and Mode S equipped aircraft, with minimal mutual interference. The 1030 MHz interrogation channel is divided into distinct and non-overlapping periods of Mode A/C and Mode S activity, known as the 'all-call' period and Mode S selective interrogation activity, known as the 'roll-call' period. Interrogations during the all-call period elicit replies from Mode A/C aircraft and acquire Mode S aircraft via acquisition of the 24-bit ICAO aircraft address.

2.1.3.2 F-9.4.2.2: Filtering & Forwarding

The change to F-9.4.2.2: Filtering & Forwarding implies:

- Configuration of the enabler SDDS-NG as the system is already capable of processing mode S data.

Note: ARTAS and SDDS-NG are already processing ASTERIX cat 34/48 from other radars.

The change to F-9.4.2.2: Filtering & Forwarding will directly impact:

- F-9.1 : Ensure Communications
 - F-9.1.2: Ensure Ground/Ground Communications
 - F-9.1.2.4: Ensure Surveillance Messages
 - F-9.1.2.4.3: Distribution Surveillance Messages -> Adjacent centres
- F-9.4.2.3: Tracking
- F-9.5: Automatic Traffic Monitoring
 - F-9.5.2: Automatic Air Traffic Monitoring
- F-9.9: Data Integration
 - F-9.9.2: Air Coupler
- F-9.10: Presentation Support
 - F-9.10.1: Surveillance Presentation
 - F-9.10.1.1: Air Surveillance Presentation

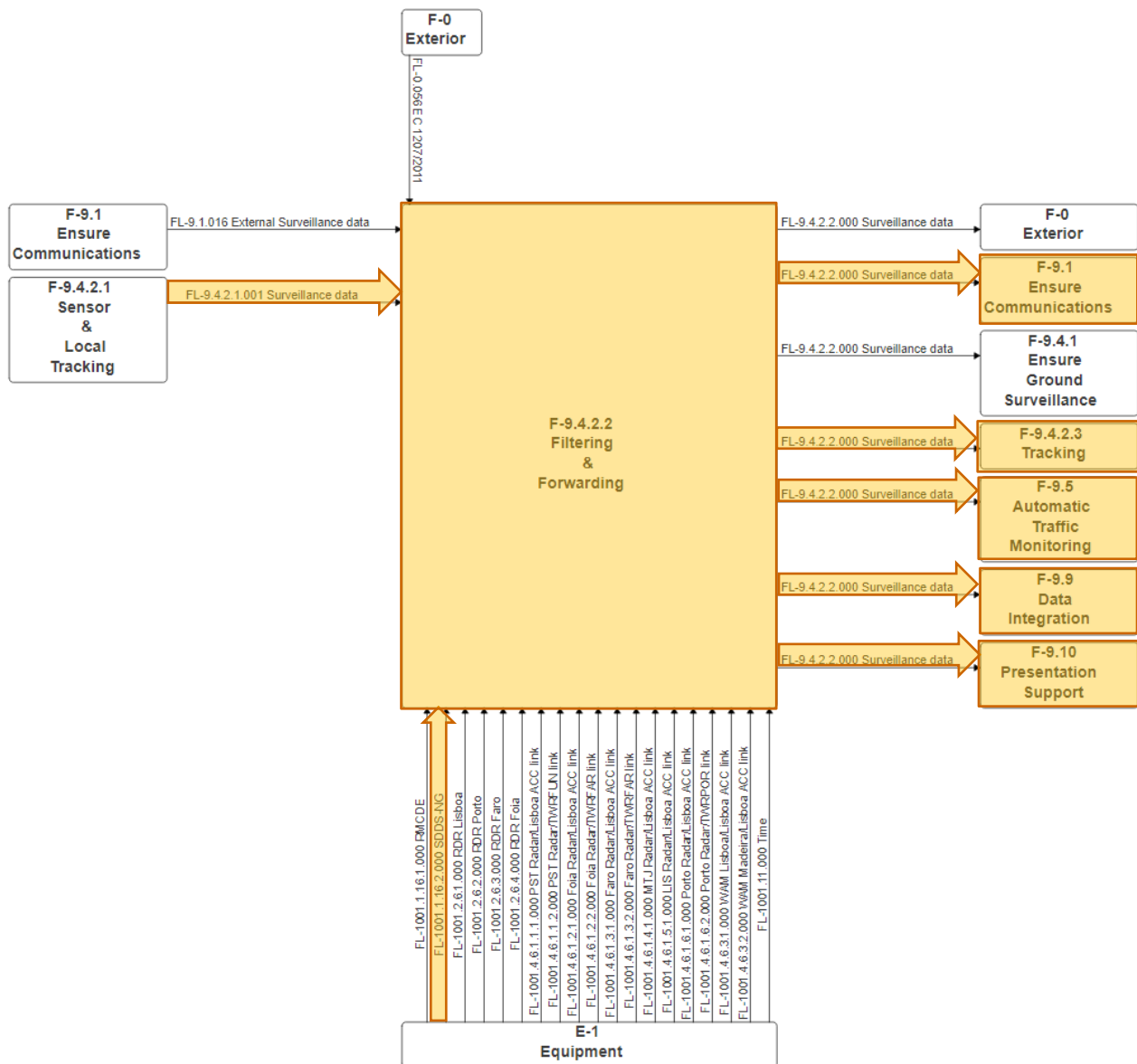


Figure 6: Impact on F-9.4.2.2: Filtering & Forwarding

2.1.3.3 F-9.1.2.4.3: Distribution Surveillance Messages

Adjacent centres will receive Porto Santo radar data in a new format. The format used is standard (ASTERIX category 34/48) and the client systems are able to process it.

As mitigation, the new Porto Santo radar can provide data in ASTERIX category 01/02, similar to the previous radar. Using this data flow will avoid the need to adapt systems in the adjacent centres for the transition.

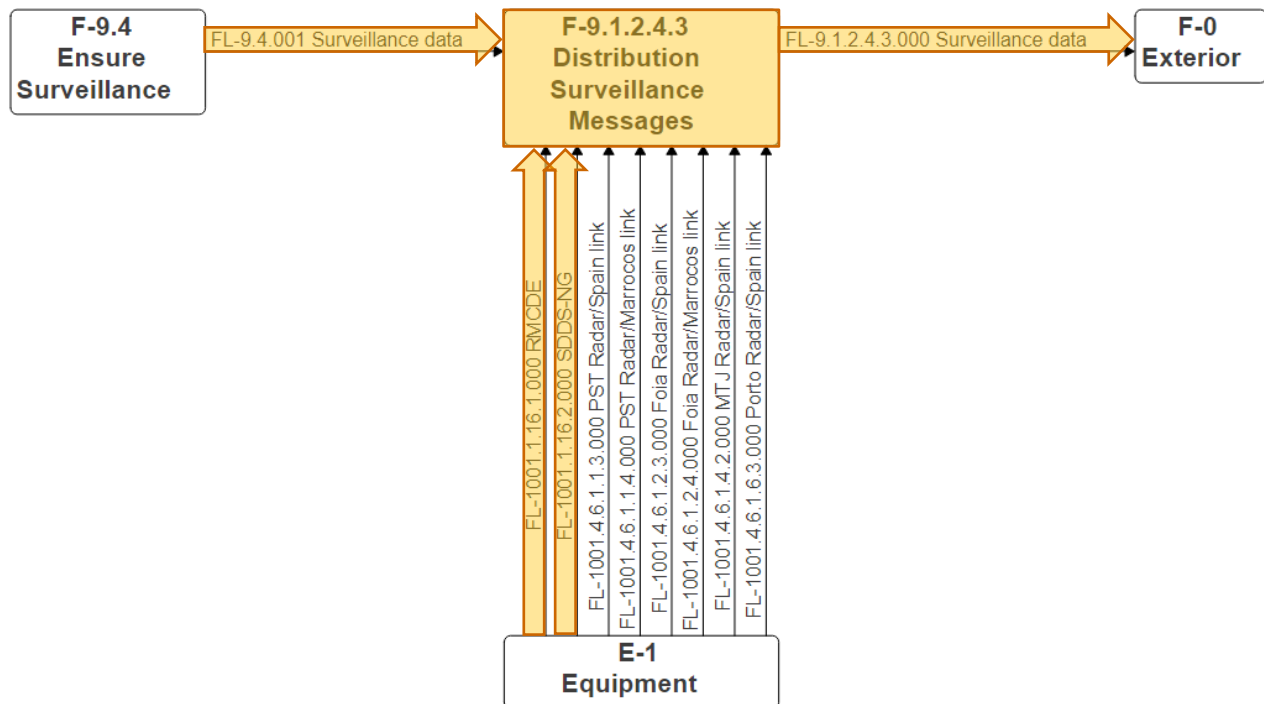


Figure 7: Impact on F-9.1.2.4.3: Distribution Surveillance Messages

R3. External partners (ONDA & ENAIRE) shall be informed of the change in the data format.

The RADAR will use ASTERIX Category 34/48, to be able to output the Mode-S information extracted from the transponder. However it is still able to output ASTERIX category 1, 2 in case the “client” is unable to process category 34/48.
Morocco and Spain were informed via the AEFMP.

2.1.3.4 F-9.4.2.3: Tracking

The change to F-9.4.2.3: Tracking implies the configuration of the enabler ARTAS main and ARTAS fallback to correctly process the new Porto Santo radar data. As these systems are already capable of processing ASTERIX category 34/48, mode S data, no additional changes are required.

The change to F-9.4.2.3: Tracking will stop the propagation of the impact further. Outputs will keep the current performance, format and contents (see 1.3 - Assumptions).

R4. Verify that the Tracking outputs from ARTAS are identical to the current operational ones.

In terms of degraded modes, if the function is not adapted correctly or fails, the flow Integrated Surveillance data could become totally or partially unavailable, corrupt or incorrect. Degraded modes are addressed in paragraph 2.1.5.

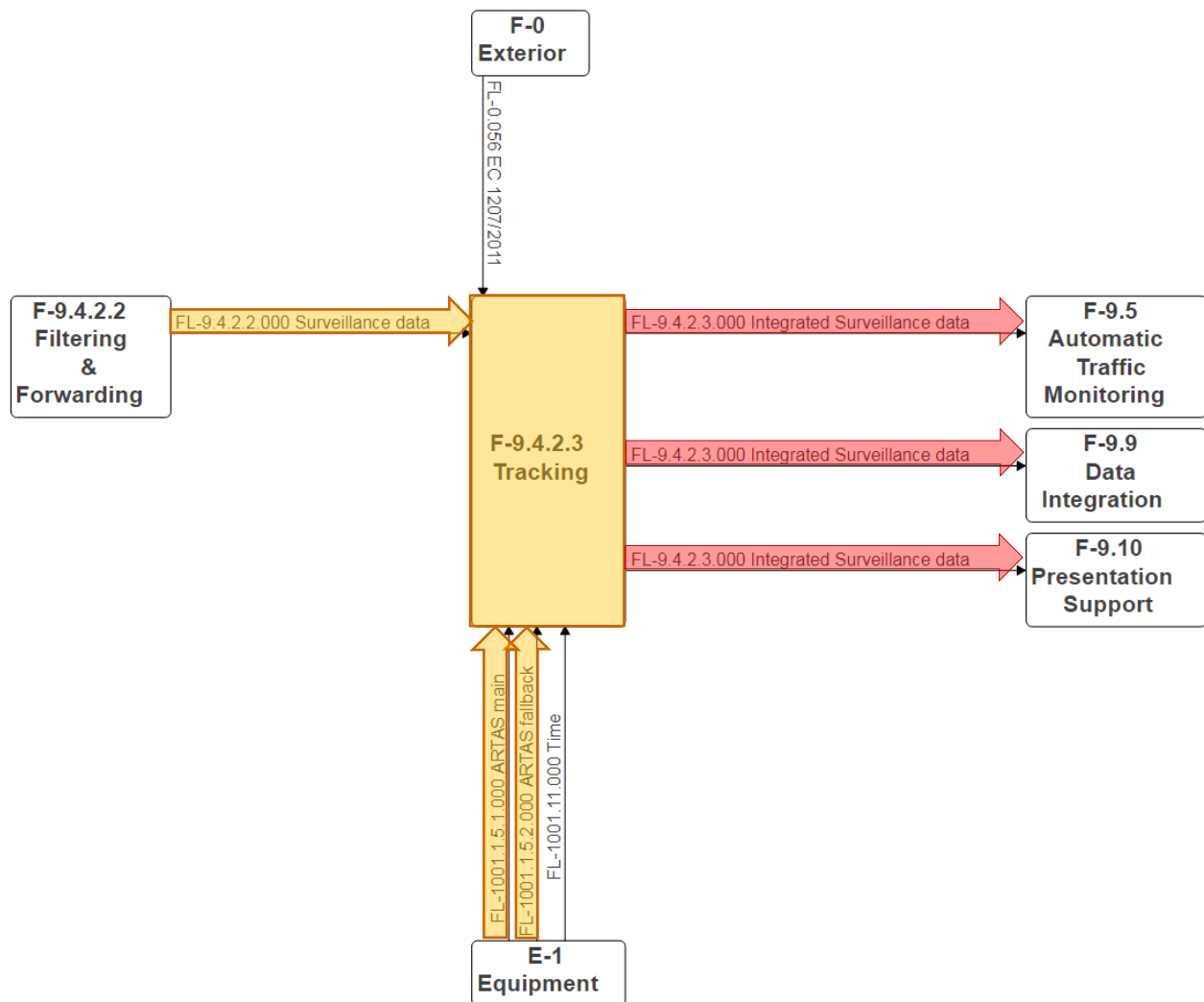


Figure 8: Impact on F-9.4.2.3: Tracking

2.1.3.5 F-9.5.2: Automatic Air Traffic Monitoring

The change to F-9.5.2: Automatic Air Traffic Monitoring implies changing the enablers' software to process ASTERIX cat 34/48, Mode S data. The change will have to be performed to the enablers:

- ATSS Lisboa
- ATSS Funchal

As mitigation, in case these enablers are not changed in due time, the new Porto Santo radar will also be able to provide data in ASTERIX category 01/02, similar to the previous radar. Using this data flow will avoid the need to adapt this function and remove the identified degraded modes.

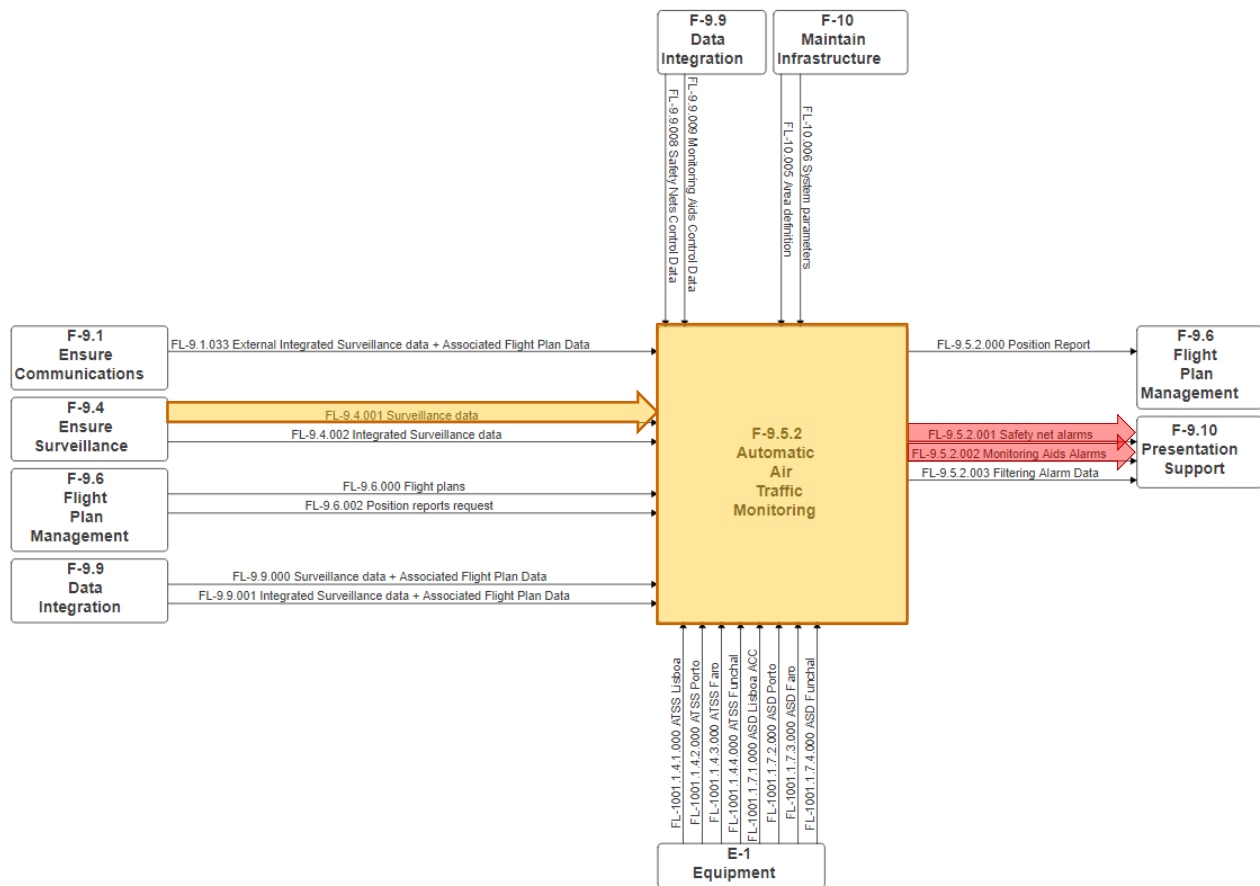


Figure 9: Impact on F-9.5.2: Automatic Air Traffic Monitoring

The change to F-9.5.2: Automatic Air Traffic Monitoring will have no impact as the outputs will keep the current format and contents.

R5. Verify that the Automatic Air Traffic Monitoring outputs are not changed.

In terms of degraded modes, if the function is not adapted correctly or fails the flows Safety net alarms and Monitoring Aids Alarms could become totally or partially unavailable, corrupt or incorrect.

Additionally, if the Automatic Air Traffic Monitoring enablers are not changed, the impact is that there will be limitations on the flows Safety net alarms and Monitoring Aids Alarms for the Porto Santo radar flow.

2.1.3.6 F-9.9.2: Air Coupler

The change to F-9.9.2: Air Coupler implies changing the enablers' software to process ASTERIX cat 34/48, Mode S data. The change will have to be performed to the enablers:

- ATSS Lisboa
- ATSS Funchal

As mitigation, in case these enablers are not changed in due time, the new Porto Santo radar will also be able to provide data in ASTERIX category 01/02, similar to the previous radar. Using this data flow will avoid the need to adapt this function and remove the identified degraded modes.

The change to 9.9.2: Air Coupler will have no impact as the outputs will keep the current format and contents.

R6. Verify that the Air Coupler outputs are not changed.

In terms of degraded modes, if the function is not adapted correctly or fails the flows Surveillance data + Associated Flight Plan Data and Integrated Surveillance data + Associated Flight Plan Data could become totally or partially unavailable, corrupt or incorrect.

Additionally, if the Air Coupler enablers are not changed, the impact is that there will be limitations on the flow FL-9.9.2.000 Surveillance data + Associated Flight Plan Data. The data from Porto Santo radar will not be available as mono sensor flow associated with flight plan information, i.e. it will not be selectable for presentation and Automatic Traffic Monitoring will also not be performed on this flow.

R7. Verify that Air Coupler enablers are capable of processing Mode S radar data.

Degraded modes are addressed in paragraph 2.1.5.

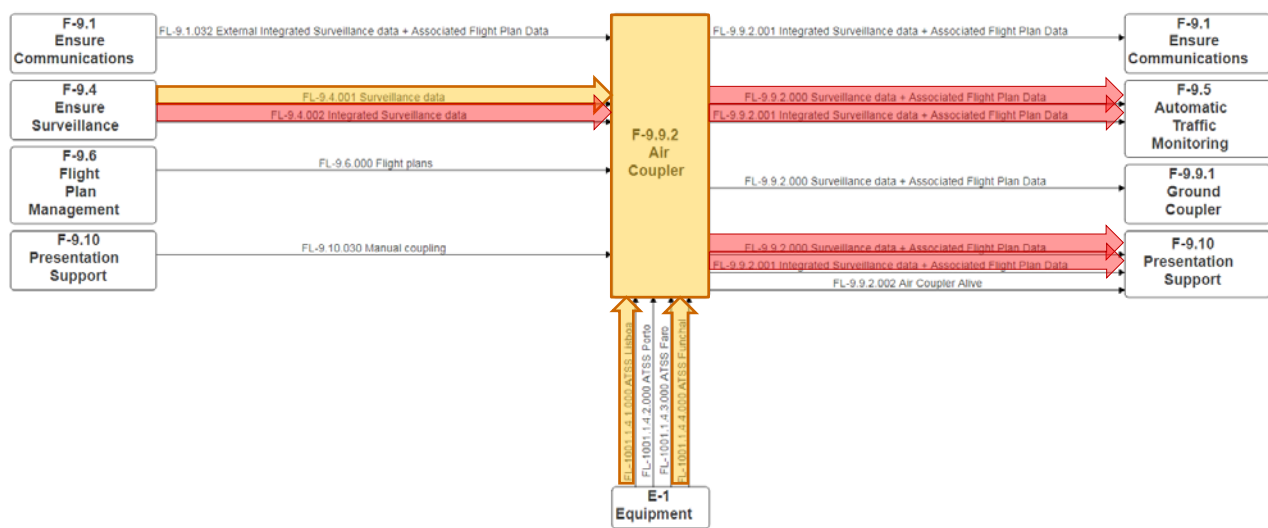


Figure 10: Impact on F-9.9.2: Air Coupler

2.1.3.7 F-9.10.1.1: Air Surveillance Presentation

The change F-9.10.1.1: Air Surveillance Presentation implies changing the enablers' software to process ASTERIX cat 34/48, Mode S data. The change will have to be performed to the enablers:

- ASD Lisboa
- ASD Funchal

As mitigation, the new Porto Santo radar can provide data in ASTERIX category 01/02, similar to the previous radar. Using this data flow will avoid the need to adapt this function.

The change to F-9.10.1.1: Air Surveillance Presentation will have no impact as the outputs will keep the current format and contents (see 1.3 - Assumptions).

R8. Verify that the Surveillance views are not changed, e.g. no Mode S specific data is displayed.

In terms of degraded modes, if the function is not adapted correctly or fails the flows Surveillance views could become totally or partially unavailable, corrupt or incorrect.

Additionally, if the Air Surveillance Presentation enablers are not changed, the impact is that there will be limitations on the flow FL-9.10.1.1.003 Surveillance views. The data from Porto Santo radar will not be available as non-correlated mono sensor flow, i.e. it will not be selectable for presentation.

R9. Verify that Air Surveillance Presentation enablers are capable of displaying Mode S radar data.

Degraded modes are addressed in paragraph 2.1.5.

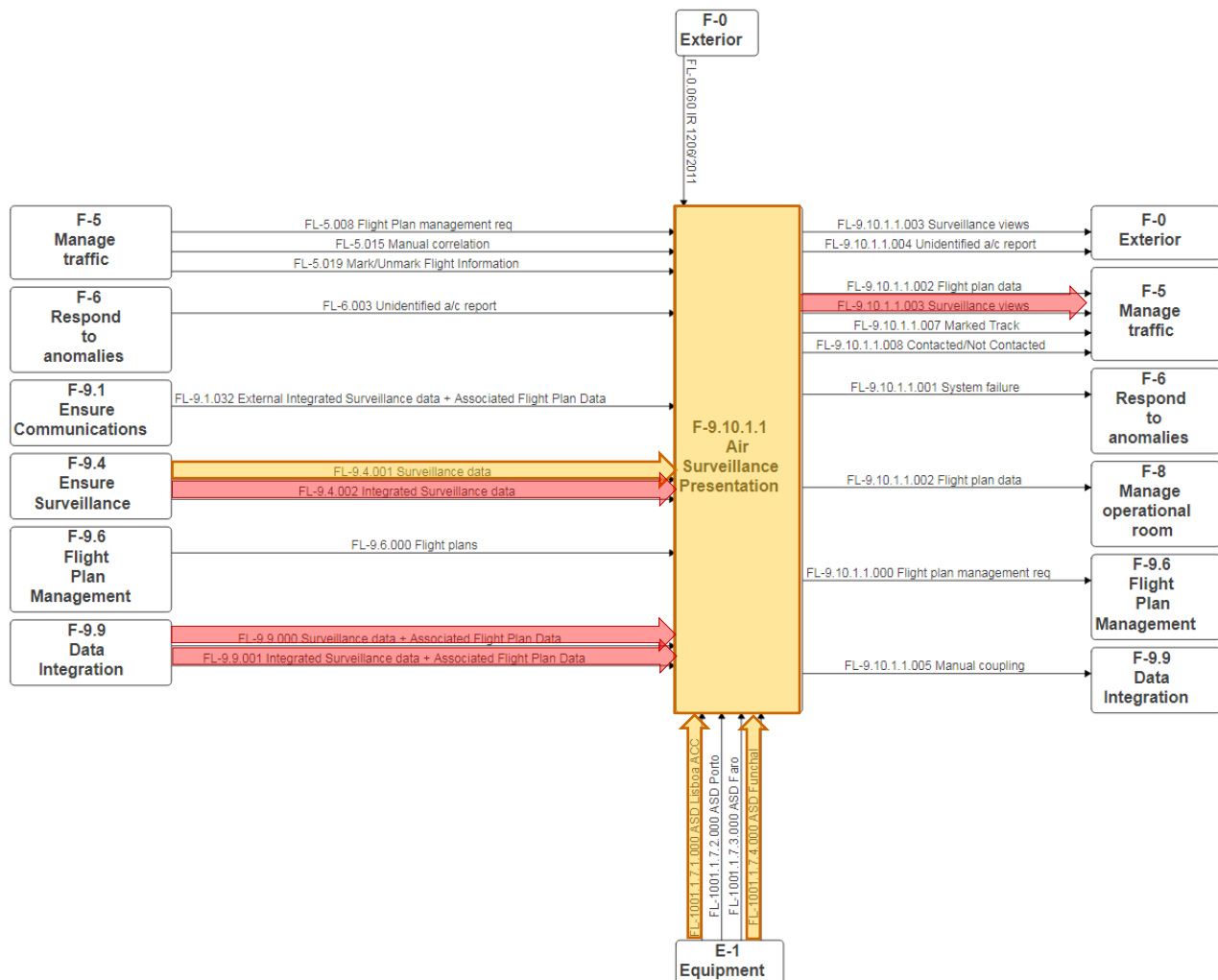


Figure 11: Impact on F-9.10.1.1: Air Surveillance Presentation

Note: The Surveillance views flow to Exterior is not impacted as the mono sensor views are not provided.

2.1.4 Change impact - Required adaptations

This paragraph summarizes all the required additional adaptations.

For this change, namely the upgrade to Mode S and the use of a new ASTERIX category, the following functions will also need to be changed:

- F-9.1.2.4.3: Distribution Surveillance Messages
- F-9.4.2.2: Filtering & Forwarding
- F-9.4.2.3: Tracking
- F-9.5.2: Automatic Air Traffic Monitoring
- F-9.9.2: Air Coupler
- F-9.10.1.1: Air Surveillance Presentation

2.1.5 Planned degraded modes

Analyse planned degraded modes:

1. Identify degraded modes and represent them using the model functions at the highest level of abstraction possible.
2. For each degraded mode, determine its impact (apply process described in 2.1.3)
3. Identify hazards
 - Check all outputs to Exterior that might be impacted
 - For all impacted outputs, check existing hazards
 - For all new outputs identify possible new hazards
 - Check all outputs to Ensure communications that might be impacted
 - For all impacted outputs, check existing hazards
 - For all new outputs that are forwarded to Exterior identify possible new hazards
 - Check all outputs to non-technical functions that might be impacted
 - For all changed or new ones perform an Operational Safety Assessment
- 4 – Identify possible causes; e.g. enabler problem (wrong implementation)
 - For all impacted functions, identify what can go wrong
- 5 – Define mitigations for the identified causes using one or more of the following strategies:
 - Avoidance – Stop the propagation of the problem in the functional system
 - Reduction or control – Reduce the probability or the impact of the problem
 - Acceptance – Acknowledge and then define ways to handle the problem

Some elements require a geographical analysis, which is performed via an Operational Safety Assessment, covered in other documents and referenced here.

The following planned degraded modes are identified:

- Problems with surveillance data – radar unavailable:
 - No data from Porto Santo radar

2.1.5.1 F-9.4.2: Ensure Air Surveillance

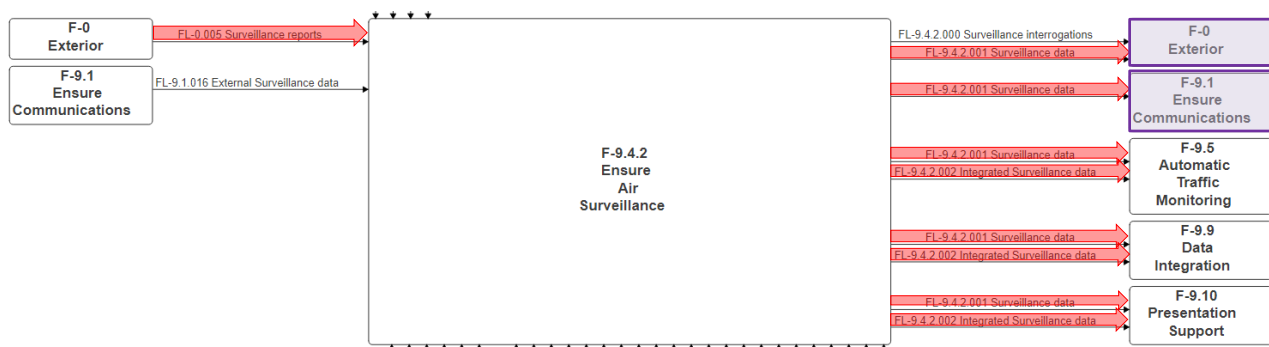


Figure 12: Planned degraded modes: Impact on F-9.4.2: Ensure Air Surveillance

Adjacent centres will not receive data from Porto Santo radar which might impact their surveillance service. To minimize the impact the following actions were defined:

- Inform Spain, Morocco and Santa Maria about the Porto Santo outage
- Propose alternative surveillance means

R10. Ensure that the adjacent centres are informed well in advance of Porto Santo outage.

The adjacent centres have been informed via several means about this outage, both in bilateral contacts and at the AEFMP group meetings.

R11. Propose alternate surveillance means to adjacent centres.

The sharing of WAM and ADS-B data from the Madeira WAM system has been proposed to the adjacent centres.
ONDA and Santa Maria ACC are correctly receiving and processing Madeira ADS-B data.

A Safety Support Case should be produced.

2.1.5.2 F-9.5.2: Automatic Air Traffic Monitoring

The loss of data from the Porto Santo radar will reduce the surveillance coverage areas, namely the traffic above FL380 and at the north the Madeira sector will not be covered.

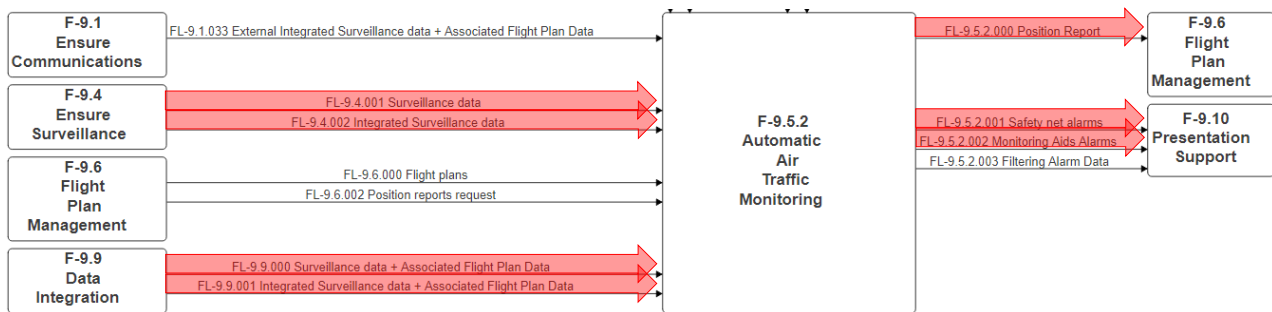


Figure 13: Planned degraded modes: Impact on F-9.5.2: Automatic Air Traffic Monitoring

There will be no position reports for aircraft without surveillance coverage. Safety nets and monitoring aids will also not be available for these aircraft.

2.1.5.3 F-9.6: Flight Plan Management

The flights crossing the area with no surveillance coverage will not be updated with position reports.

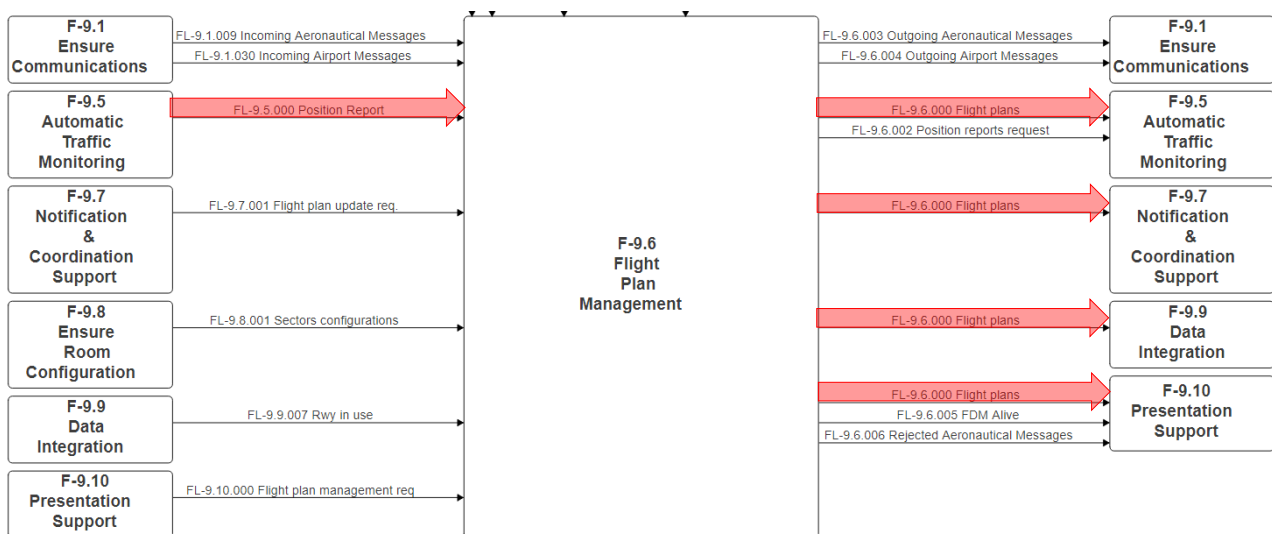


Figure 14: Planned degraded modes: Impact on F-9.6: Flight Plan Management

The estimated times in the flight plan will not be updated with surveillance data reports resulting in less accurate estimates.

2.1.5.4 F-9.7: Notification & Coordination Support

The loss of data from the Porto Santo radar will reduce the surveillance coverage areas, namely the traffic above FL380 and at the north the Madeira sector will not be covered. The Notification & Coordination Support function will not be performed for flights without surveillance reports.

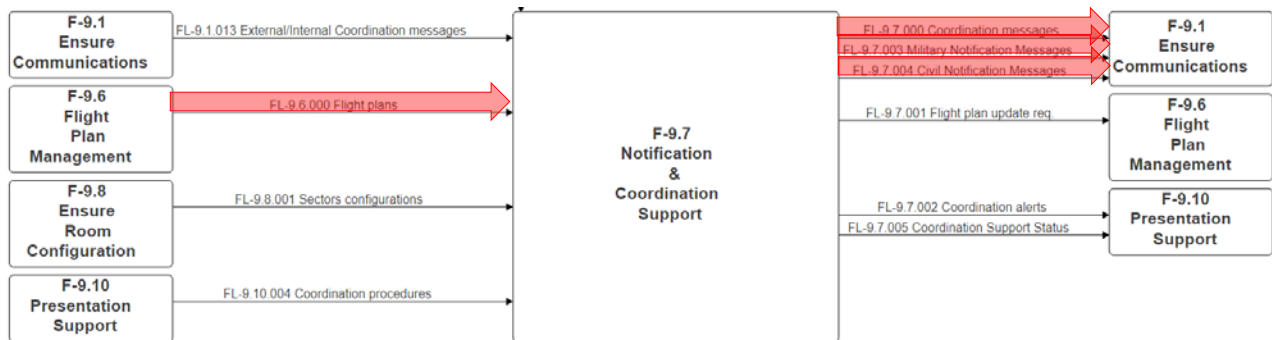


Figure 15: Planned degraded modes: Impact on F-9.7: Notification & Coordination Support

2.1.5.5 F-9.9.2: Air coupler (in Data Integration)

The loss of data from the Porto Santo radar will reduce the surveillance coverage areas, namely the traffic above FL380 and at the north the Madeira sector will not be covered.

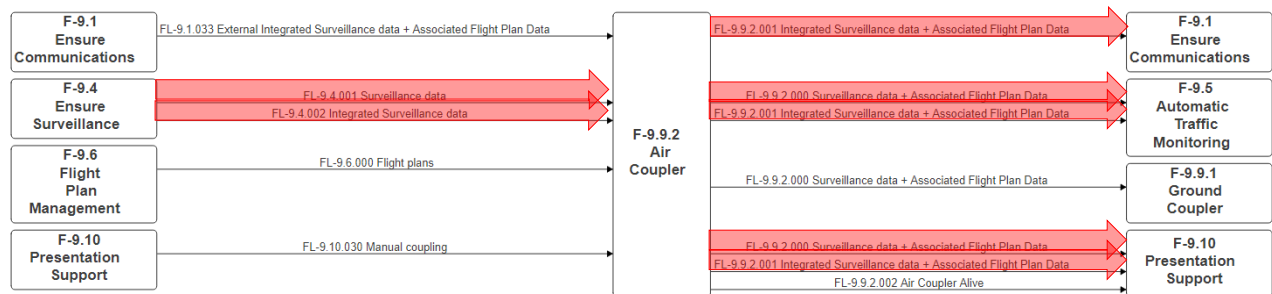


Figure 16: Planned degraded modes: Impact on F-9.9.2: Air coupler

2.1.5.6 F-9.10.1: Surveillance Presentation

The loss of data from the Porto Santo radar will reduce the surveillance coverage areas, namely in the Madeira sector.

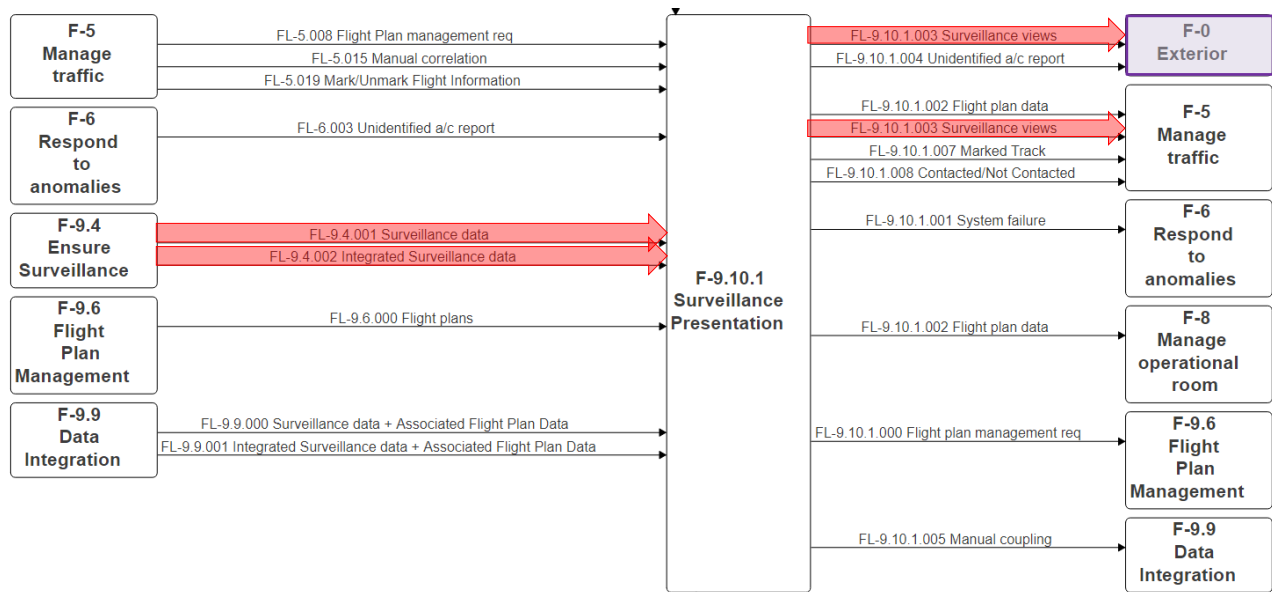


Figure 17: Planned degraded modes: Impact on F-9.10.1: Surveillance Presentation

2.1.5.7 F-5: Manage traffic

The information from Porto Santo radar is the only independent means of surveillance in a big area of the Madeira sector including the transition to the West sector. Without this surveillance data source, surveillance services in this area cannot be provided.

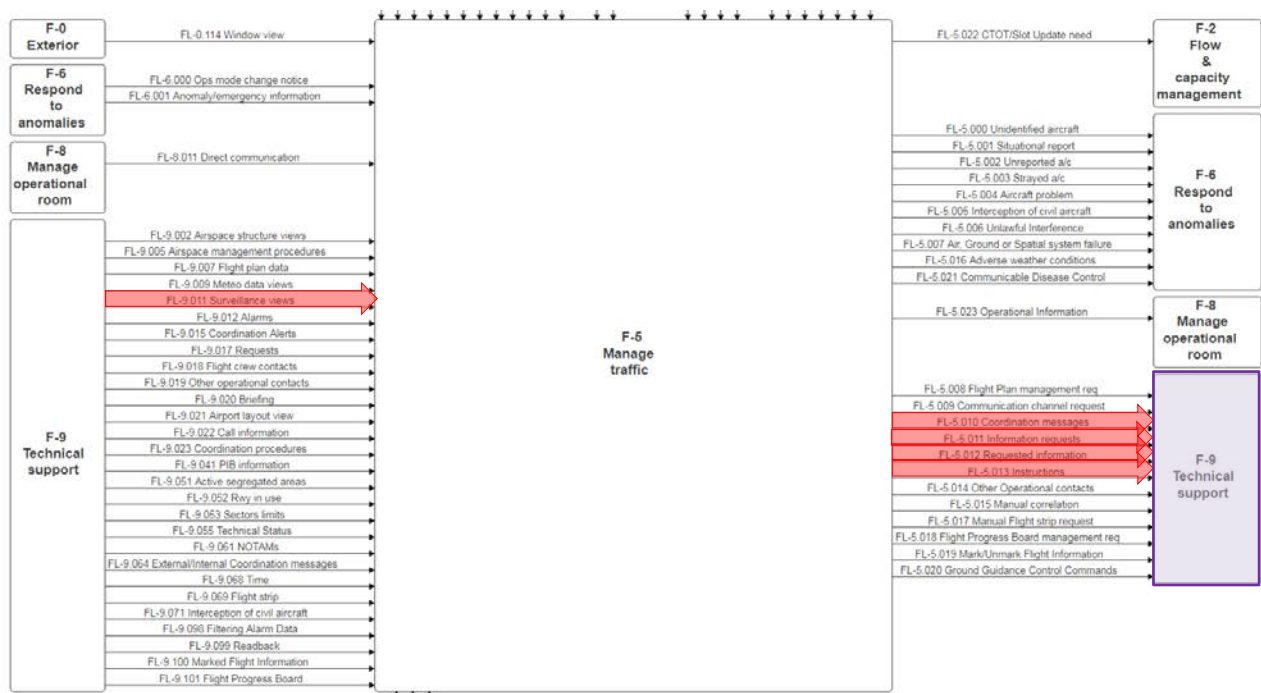


Figure 18: Planned degraded modes: Impact on F-5: Manage traffic

Although there are other surveillance means for the Madeira sector, namely Madeira WAM and ADS-B system, the WAM has limited range (the vertical limit is FL380 and the maximum range from PST is 186NM) and ADS-B only tracks are not being provided. These limitations will impact the service inside part of the Madeira sector and the adjacent units in the areas not covered by other sensors. An evaluation of the current surveillance system without Porto Santo radar was performed to clearly assess the impact of its outage (ref. [4]).

The operational impact of this degradation was assessed (see ref. [5]) and mitigations defined. Below is a list of identified mitigation actions:

R12. Enable the display of flight plan tracks in the Madeira Sector and part of the West sector.

Implemented and in use in Lisboa ACC.

R13. Tune ATM system to ensure higher adherence of flight plans to surveillance data.

R14. Include the new points in the surveillance display systems.

R15. Review the radar degradation tables for en-route, including Madeira sector.

R16. Develop degradation tables for Madeira TMA.

R17. Implement a procedure to print contingency flight strips.

Contingency procedures were studied and defined to ensure a safe ATC service during the outage of Porto Santo radar. These procedures were assessed in the ASO (see ref. [5]).

R18. Define contingency procedures for surveillance failures affecting the Madeira sector.

R19. Define the Madeira sector capacities for contingency operations.

R20. Assess the safety of the contingency procedures for the Madeira sector.

R21. Train the contingency procedures for surveillance failures affecting the Madeira sector.

Training took place. It started in February 2018.

R22. Publish the contingency procedures for surveillance failures affecting the Madeira sector.

Published in AIP SUP 057/2017.

2.1.5.8 Hazards in Planned degraded modes

As there are no new outputs of the border functions, there are no new hazards.

The list of existing hazards, as identified in the unit FHA for Lisboa ACC and the Madeira tower, and relevant for this change, are covered in Table 5: Normal operations: Hazard list.

The flows that might be affected by this change are:

- Surveillance interrogations – Already covered in paragraph 2.2 - Normal operations
- Surveillance data – Already covered in paragraph 2.2 - Normal operations
- Surveillance views - Already covered in paragraph 2.2 - Normal operations
- Coordination messages
- Instructions

The following table examines the impact this change might have on the existing hazards:

Flow	Hazard	Probability of hazard
Coordination messages	Not provided	Possible increase due to reduction in surveillance coverage area.
Coordination messages	Corrupt	Same as in normal operations.
Coordination messages	Incorrect	Possible increase due to reduction in surveillance coverage area.
Instructions	Not provided	Possible increase due to reduction in surveillance coverage area.
Instructions	Corrupt	Same as in normal operations.
Instructions	Incorrect	Possible increase due to reduction in surveillance coverage area.

Table 1: Planned degraded modes: Impact on existing hazards

2.1.5.8.1 Planned degraded modes – External hazards

Hazards outside the system are addressed by the model as inputs to the functional model that might impact its functioning. These inputs might be correct, incorrect or missing. The fact that the Porto Santo radar is out of service during its replacement will cause the missing of surveillance information in the impacted area. The mitigations defined for this planned degraded mode aim also at reducing the risk associated with these external hazards.

As an example, in cases of communication failure in an aircraft, the system will miss the communication inputs from this aircraft. If it is also in an area where there is no surveillance data, the system will not detect this problem as easily as before, but there are processes that ensure a safe provision of service in areas with no surveillance.

2.1.5.9 Cause identification in Planned degraded modes

All the causes covered in paragraph 2.2 - Normal operations are not repeated here.

The following table identifies possible causes for the hazards identified above:

Hazard	Possible causes
Not provided Coordination messages	Aircraft ignored as it is not shown on the screen, moving and entering adjacent area. Error on the FPL track position causes lack of awareness of need to coordinate. When applying procedural control, routes in Madeira sector are too close to adjacent area routes (BEXAL-KOMBA) requiring coordination of all traffic, with high probability of not coordinating some aircraft due to workload.
Incorrect Coordination messages	Aircraft coordinated based on outdated flight strip information. Error on the FPL track position causes wrong coordination of aircraft, e.g. wrong estimated exit time or flight level. When applying procedural control, routes in Madeira sector are too close to adjacent area routes (BEXAL-KOMBA) requiring coordination of all traffic, with high probability of wrong coordination due to workload.
Not provided Instructions	Aircraft in conflict with other traffic is ignored because it is not shown on the screen, causes ATCO not issuing instruction. Error on the FPL track position misleads awareness of real aircraft separation and causes ATCO not to issue required separation instruction.
Incorrect Instructions	Wrong awareness of aircraft not shown on the screen causes ATCO to issue wrong instruction. Error on the FPL track position misleads awareness of real aircraft separation and causes ATCO to issue wrong separation instruction.

Table 2: Planned degraded modes: Cause identification

2.1.5.10 Mitigation actions for planned degraded modes

The following actions have already been identified during the analysis of each hazard:

Hazard	Mitigation Actions
Not provided Coordination messages	<p>Strategy: Reduction or control</p> <p>R21. Train the contingency procedures for surveillance failures affecting the Madeira sector.</p> <p>R12. Enable the display of flight plan tracks in the</p> <p>R13. Tune ATM system to ensure higher adherence of flight plans to surveillance data.</p> <p>Strategy: Avoidance</p> <p>R18. Define contingency procedures for surveillance failures affecting the Madeira sector.</p> <p>R22. Publish the contingency procedures for surveillance failures affecting the Madeira sector.</p>
Incorrect Coordination messages	<p>Strategy: Reduction or control</p> <p>R21. Train the contingency procedures for surveillance failures affecting the Madeira sector.</p> <p>R12. Enable the display of flight plan tracks in the Madeira Sector and part of the West sector.</p> <p>R13. Tune ATM system to ensure higher adherence of flight plans to surveillance data.</p> <p>Strategy: Avoidance</p> <p>R18. Define contingency procedures for surveillance failures affecting the Madeira sector.</p> <p>R22. Publish the contingency procedures for surveillance failures affecting the Madeira sector.</p>
Not provided Instructions	<p>Strategy: Reduction or control</p> <p>R21. Train the contingency procedures for surveillance failures affecting the Madeira sector.</p> <p>R12. Enable the display of flight plan tracks in the Madeira Sector and part of the West sector.</p> <p>R13. Tune ATM system to ensure higher adherence of flight plans to surveillance data.</p>
Incorrect Instructions	<p>Strategy: Reduction or control</p> <p>R21. Train the contingency procedures for surveillance failures affecting the Madeira sector.</p> <p>R12. Enable the display of flight plan tracks in the Madeira Sector and part of the West sector.</p> <p>R13. Tune ATM system to ensure higher adherence of flight plans to surveillance data.</p>

Table 3: Planned degraded modes: Risk mitigation actions

2.1.6 Transition

During the installation and transition, the main impact will be the loss of data from the Porto Santo radar. When the upgrade of the Porto Santo radar is complete, its information will be evaluated. During this time the data will still not be provided. After successful evaluation, the data will be integrated in the systems and surveillance services in Madeira sector and Madeira Tower will return to normal. Only at this time will data be again sent to adjacent centres.

The loss of data from the Porto Santo radar impacts the Surveillance data output from F-9.42.1: Sensor & Local Tracking and the downstream functions:

- F-9.4.2: Ensure Air Surveillance
- F-9.10.1: Surveillance Presentation

- F-5: Manage traffic

This impact requires a geographical analysis.

The loss of data from the Porto Santo radar can also occur during normal operations due to a failure of in case of maintenance interventions.

The Porto Santo radar will be out of service until the radar data and the required system changes are successfully evaluated and the NSA accepts the proposed change.

Degraded mode	Plan	Impact
No data	From 17 th October until January 2019	See below.
Corrupt data	May occur during test phases (From December to May)	Avoided by following procedure: Radar will be disconnected from operational system. All tests and evaluations will be conducted on the test environment.
Incorrect data	May occur during test phases (From December to May)	Avoided by following procedure: Radar will be disconnected from operational system. Evaluations will be conducted on the test environment and system will only be connected to the operational environment after data is validated.

Table 4: Planned degraded modes

With these actions it can be ensured that during transition the only relevant degraded mode is the loss of Porto Santo radar data.

Note: In the period following any transition issues may arise. During these times additional awareness is required to actively identify unforeseen consequences, evaluate them and act is needed. Special monitoring requirements may need to be put in place during these transient functional system states.

2.2 Normal operations

1 – Identify the impacted border functions, i.e. with interfaces to either non-technical functions or Ensure communications or Exterior.

2 – Identify hazards, Identify possible causes and Define mitigations as described in 2.1.5.

From the above analysis of the change, the impacted border functions, i.e. with interfaces to either non-technical functions or Ensure communications or Exterior are:

- Sensor & Local Tracking
- Filtering & Forwarding
- Air Surveillance Presentation

2.2.1 Hazards in Normal operations

As there are no new outputs of the border functions, there are no new hazards.

The existing hazards, as identified in the unit FHA for Lisboa ACC and the Madeira tower and relevant for this change are:

Data Flow	Destination	Harmful effect
F-5 – Manage Traffic		
- Requested Information Not provided Incorrect Corrupted	Flight crew	Possible MAC (Help needed for scenarios)
- Instructions	Flight crew	Possible CFIT, MAC or Taxiway Collision in case of

Data Flow	Destination	Harmful effect
Not provided Incorrect Corrupted		wrong or missing instructions causing erosion of separation not detected or prevented by aircrew(s).
- Coordination messages ¹ Not provided Incorrect Corrupted	Adjacent units	Possible MAC (Help needed for scenarios)

Table 5: Normal operations: Hazard list

The flows that might be affected by this change are:

- Surveillance interrogations – see analysis in 2.1.3.1
- Surveillance data – see analysis in 2.1.3.2
- Surveillance views

Analysis of the impact on Surveillance views requires a geographical analysis.

The flow Surveillance views impacts the function Manage traffic (see F-9.5.2:) and can indirectly impact the following flows:

- Requested Information
- Instructions
- Information requests
- Coordination messages

R23. Perform Operational Safety Assessment of the possible impacts of Surveillance views, including a geographical analysis.

ASO ???

2.2.1.1.1 Normal operations – External hazards

Hazards outside the system are addressed by the model as inputs to the functional model that might impact its functioning. These inputs might be correct, incorrect or missing. In normal operations there is no change to the way Hazards outside the system are handled.

2.2.2 Cause identification in Normal operations

As this is a technical change, the causes are associated with the changed components, namely enablers.

The following image depicts the flow of surveillance information from the radar to the ATCO display:

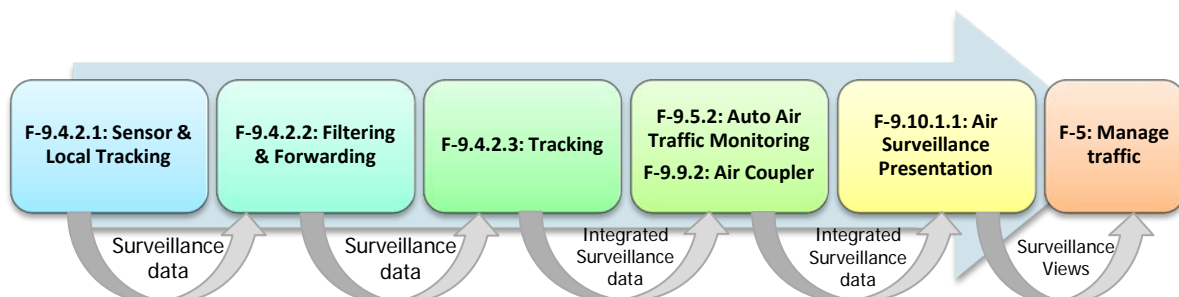


Figure 19: Flow of surveillance data

¹ Coordination messages include also the ones generated by the “Notification and Coordination Support” function.

Function	Possible causes - Enablers
F-9.4.2.1: Sensor & Local Tracking	Radar with lower performance or coverage can cause partial loss of surveillance data in the Porto Santo coverage area. Misalignment of the radar may cause corrupt or incorrect surveillance data in the Porto Santo coverage area.
F-9.4.2.2: Filtering & Forwarding	SDDS-NG not capable to process data or wrong configuration might cause losses of surveillance data.
F-9.4.2.3: Tracking	Wrong configuration of ARTAS might cause losses of, incorrect or corrupt Integrated Surveillance data.
F-9.5.2: Automatic Air Traffic Monitoring	ATSS not able to process Mode S data will cause loss of safety net and monitoring aid alarm data for Porto Santo flow. Wrong configuration of ATSS might cause losses of, incorrect or corrupt Surveillance data.
F-9.9.2: Air Coupler	ATSS not able to process Mode S data will cause loss of integrated surveillance data for Porto Santo flow. Wrong configuration of ATSS might cause losses of, incorrect or corrupt Surveillance data.
F-9.10.1.1: Air Surveillance Presentation	ASD not able to process Mode S data will cause loss of Surveillance views for Porto Santo flow. Wrong configuration of ASD might cause losses of, incorrect or corrupt Surveillance views.

Table 6: Normal operations: Cause identification

Note: If a function is not adapted correctly or fails the output flows could become totally or partially unavailable, corrupt or incorrect. This is considered a degraded mode and is addressed in paragraph 2.1.5.

2.2.3 Mitigation actions for Normal Operations

The following actions have already been identified during the analysis of each function:

Function	Actions
F-9.4.2.1: Sensor & Local Tracking	Strategy: Avoidance R2. The new Porto Santo radar shall detect cooperative non Mode S equipped aircraft.
F-9.4.2.2: Filtering & Forwarding	Strategy: Reduction or control R3. External partners (ONDA & ENAIRE) shall be informed of the change in the data format.
F-9.4.2.3: Tracking	Strategy: Avoidance R4. Verify that the Tracking outputs from ARTAS are identical to the current operational ones.
F-9.5.2: Automatic Air Traffic Monitoring	Strategy: Avoidance R5. Verify that the Automatic Air Traffic Monitoring outputs are not changed.
F-9.9.2: Air Coupler	Strategy: Avoidance R6. Verify that the Air Coupler outputs are not changed. R7. Verify that Air Coupler enablers are capable of processing Mode S radar data.
F-9.10.1.1: Air Surveillance Presentation	Strategy: Avoidance R8. Verify that the Surveillance views are not changed R9. Verify that Air Surveillance Presentation enablers are capable of displaying Mode S radar data.

Table 7: Normal operations: Risk mitigation actions

To address the identified possible causes, the following additional actions to reduce the safety risk are proposed:

R24. Evaluate Porto Santo radar performance and analyse shortcomings and their impact.

An initial evaluation was performed and limitations to the coverage range were identified. The cause was determined and the following actions taken:

- Change ASTERIX data format to allow for ranges above 256NM, extended range, in category 048.
- Request change in ARTAS (ACP 595).
- SDDS-NG is already capable of handling the extended range reports.

3 Safety Argument

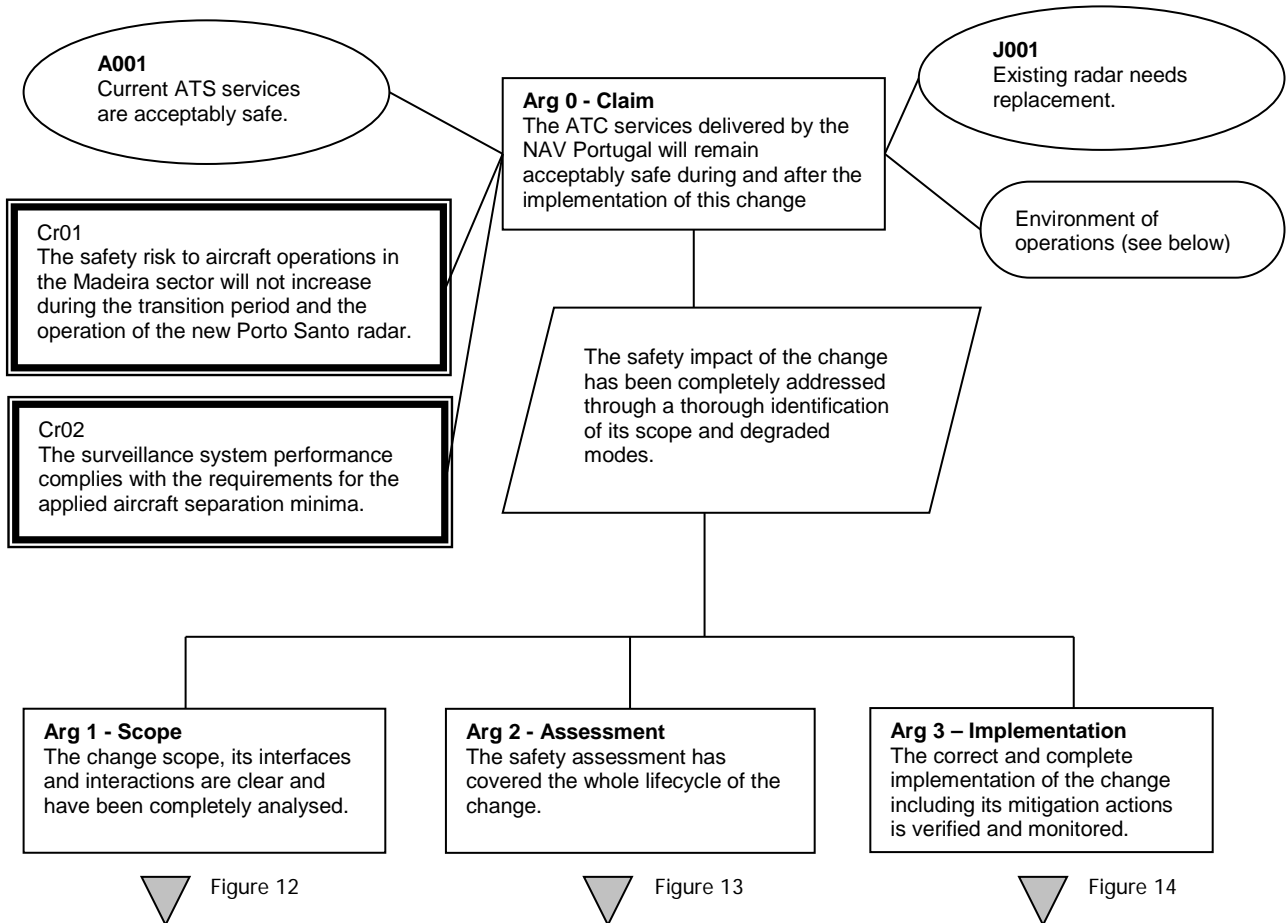


Figure 20: Top level argument

Note: The argument's graphical presentation uses the GSN notation as described in the Safety Case Development Manual (Ref. [9]).

A001 – Assumption

The ATS services provided by NAV Portugal are considered acceptably safe.

There are no reservations from the regulator with regards to the safety of the services provided by the NAV Portugal neither are there impeditive issues identified by NAV Portugal.

J001 – Justification for the change

The existing radar has reached its end of life. Performance is degrading and maintenance can no longer ensure its normal functioning. The degradation is notorious and has been reported in the monthly evaluation reports.

Context

The environment of operations relevant for this assessment is:

- Lisboa ACC, described in [2]
- Madeira Tower, described in [3]

Safety Criteria

Cr01

The safety risk to aircraft operations in the Madeira sector will not increase during the transition period and the operation of the new Porto Santo radar.

This criterion is translated to:

1. There will be no increase of separation infringements in the Madeira sector.
2. There will be no increase of lack of coordination occurrences between the Madeira sector and adjacent areas and sectors.

Safety objectives / Proxies: There will be no separation infringements or lack of coordination with adjacent centres attributable to this change, from the stopping of the existing radar until 2 years after the operational use of the new Porto Santo radar.

Cr02

The surveillance system performance complies with the requirements for the applied aircraft separation minima.

Safety objective / Proxy: The surveillance system performance, in the Madeira sector, Madeira TMA and the transition to the West sector, where the current defined separation minima is 8NM, will comply with the performance requirements applicable for the surveillance services provided by NAV Portugal.

3.1 Argument 1 – Change scope

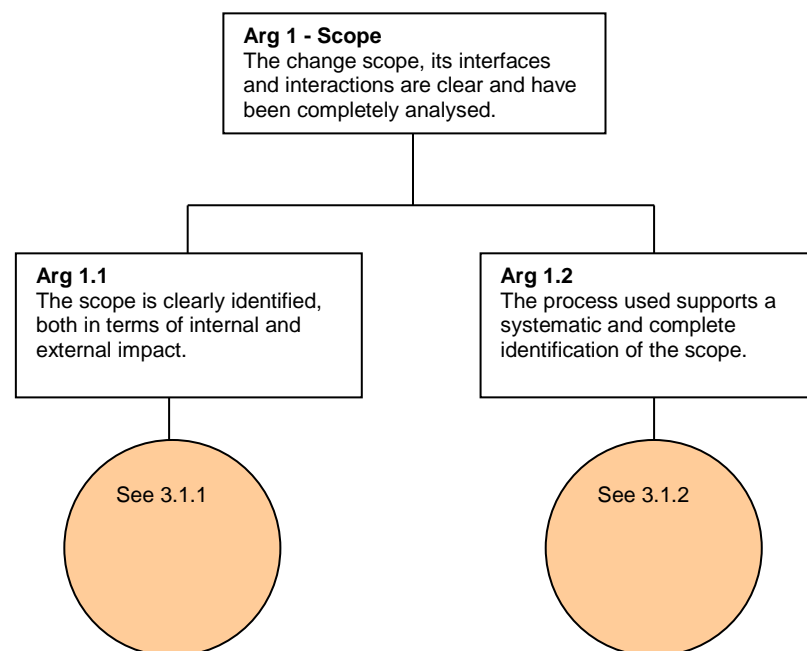


Figure 21: Argument 1 – Change scope

3.1.1 Argument 1.1 – Change impact

The change impact is analysed in 2.

There is impact to the Lisboa ACC, Madeira tower and adjacent units of Santa Maria.

There is impact to Morocco and Spain.

There are changes to the surveillance data interfaces.

The identified impacted functions are:

- F-9.4.2.1: Sensor & Local Tracking – see 2.1.3.1
- F-9.4.2.2: Filtering & Forwarding – see 2.1.3.2

- F-9.4.2.3: Tracking – see 2.1.3.4
- F-9.9.2: Air Coupler – see 2.1.3.5
- F-9.10.1.1: Air Surveillance Presentation – see 2.1.3.7

3.1.2 Argument 1.2 – Process

The process used to analyze the change is described in the blue boxes inserted in 2.

It is systematic and can be repeated by other experts.

It ensures that the scope of the change is completely and correctly identified covering:

- (i) *the equipment, procedural and human elements being changed;*
- (ii) *interfaces and interactions between the elements being changed and the remainder of the functional system;*
- (iii) *interfaces and interactions between the elements being changed and the context in which it is intended to operate;*
- (iv) *the life cycle of the change from definition to operations including transition into service;*
- (v) *planned degraded modes of operation of the functional system;*

And the identification of hazards.

Appendix A - Traceability to regulation EU 1035/2011 and Appendix B - Traceability to regulation 2017/373
AMC & GM present the compliance with applicable regulation, AMC and GM.

3.2 Argument 2 – Safety Assessment

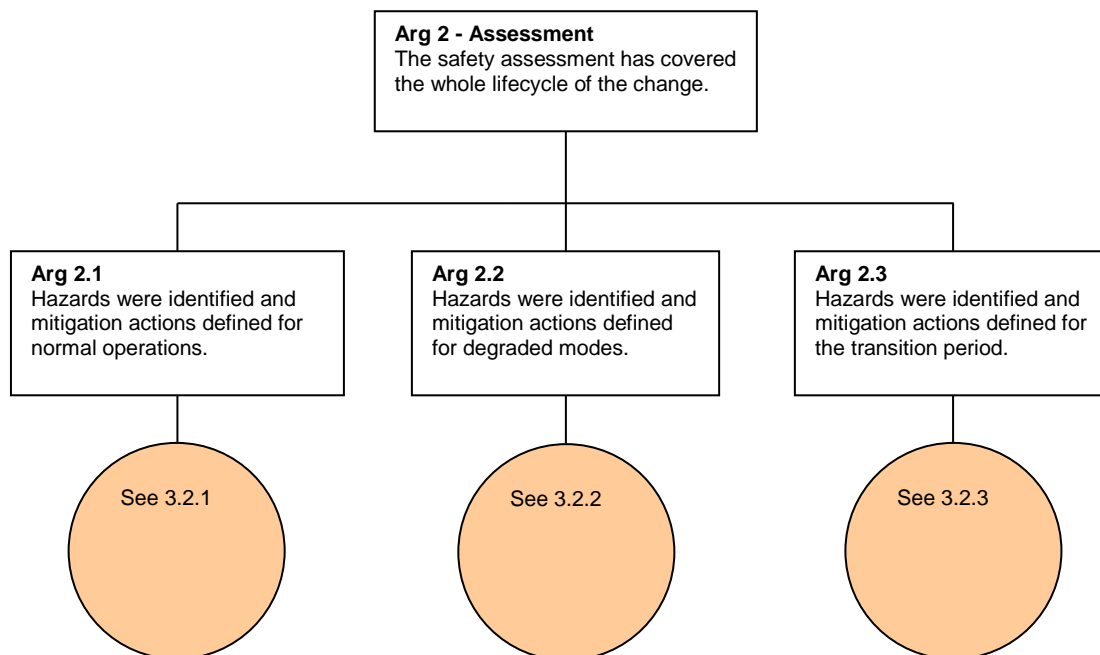


Figure 22: Argument 2 – Safety Assessment

3.2.1 Argument 2.1 – Normal operations

Normal operations have been analyzed in 2.2 - Normal operations.

As there are no new outputs of the border functions, there are no new hazards.

Impacts on existing hazards have been assessed. Causes have been identified.

Actions to reduce the impact on existing hazards were defined. See 2.2.3 - Mitigation actions.

3.2.2 Argument 2.2 – Degraded modes

Degraded modes have been analyzed in paragraph 2.1.5. - Planned degraded modes

An evaluation of the current surveillance system without Porto Santo radar was performed to clearly assess the impact of its outage (ref. [4]).

The operational impact of this degradation was assessed (see ref. [5]) and mitigations defined.

Contingency procedures were studied and defined to ensure a safe ATC service during the outage of Porto Santo radar. These procedures were assessed in the ASO (see ref. [5]).

3.2.3 Argument 2.3 – Transition

Transition was assessed in paragraph 2.1.6 - Transition.

The impact during transition will be the loss of Porto Santo radar data.

Alternative surveillance means will be provided to external users to mitigate loss of surveillance coverage. To minimize the impact of the loss of Porto Santo radar on the provision of ATC services in the Madeira sector, changes were proposed to both the airspace and operational procedures. An Operational Safety Assessment was performed on the transition period covering both the loss of surveillance coverage in the Madeira sector and the proposed airspace and procedure changes (see ref. [5]).

ID	Description
R14.	Include the new points in the surveillance display systems.
R15.	Review the radar degradation tables for en-route, including Madeira sector.
R16.	Develop degradation tables for Madeira TMA.
R17.	Implement a procedure to print contingency flight strips.
R18.	Define contingency procedures for surveillance failures affecting the Madeira sector.
R19.	Define the Madeira sector capacities for contingency operations.
R20.	Assess the safety of the contingency procedures for the Madeira sector.
R21.	Train the contingency procedures for surveillance failures affecting the Madeira sector.
R22.	Publish the contingency procedures for surveillance failures affecting the Madeira sector.

3.3 Argument 3 – Change Implementation

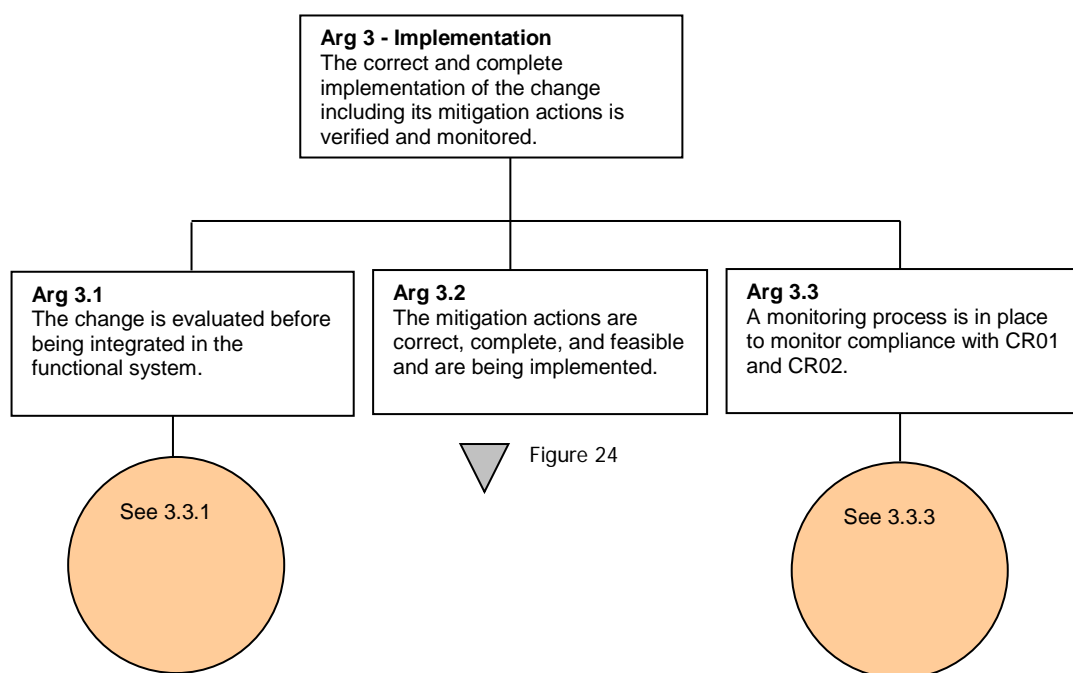


Figure 23: Argument 3 – Change Implementation

3.3.1 Argument 3.1 – Verification

The start of the transition, i.e. the stop of the radar station, was only performed after a successful completion of the following actions:

ID	Description
R18.	Define contingency procedures for surveillance failures affecting the Madeira sector.
R19.	Define the Madeira sector capacities for contingency operations.
R20.	Assess the safety of the contingency procedures for the Madeira sector.
R21.	Train the contingency procedures for surveillance failures affecting the Madeira sector.
R22.	Publish the contingency procedures for surveillance failures affecting the Madeira sector.

Table 8: Verification of conditions for transition

The integration into normal operations will only be performed after the evaluation of the radar performance and of the tracking behavior with the changed radar integrated. The change will only be integrated in the functional system after the successful completion of the following evaluation actions:

ID	Description
R4.	Verify that the Tracking outputs from ARTAS are identical to the current operational ones.
R5.	Verify that the Automatic Air Traffic Monitoring outputs are not changed.
R6.	Verify that the Air Coupler outputs are not changed.
R8.	Verify that the Surveillance views are not changed
R24.	Evaluate Porto Santo radar performance and analyse shortcomings and their impact.

Table 9: Normal operations evaluation actions

3.3.2 Argument 3.2 – Mitigation

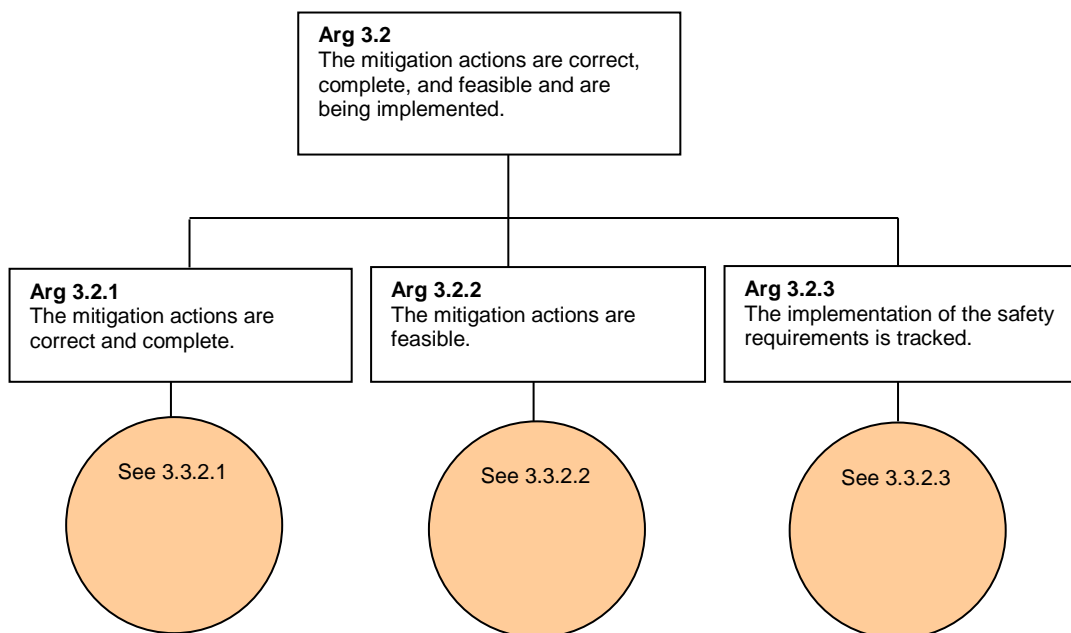


Figure 24: Argument 3.2 – Mitigation

3.3.2.1 Argument 3.2.1 – Mitigation is correct & complete

The impact of the change is systematically identified with the help of a model in both the normal operation mode and the planned degraded modes. The model is used to help ensure completeness of the analysis, as

it captures in a systematic way, knowledge from various experts. All functions that are directly or indirectly affected are listed and analyzed.

The identification of hazards is performed by checking all outputs that directly or indirectly are sent to Exterior (the outside world) that might be impacted. For all impacted outputs, check existing hazards; for all new outputs identify possible new hazards. Also all outputs to non-technical functions that might be impacted are checked and for all changed or new ones an Operational Safety Assessment is performed. After identifying the hazards, the possible causes that might arise from the change under analysis are identified. The experts from the area identify what can go wrong for all impacted functions. The model is in fact used as a check list that will allow for a systematic process to define the mitigation actions and also allows for the reproducibility of the outputs.

The last step is to define mitigations for the identified causes using one or more of the following strategies, in order of decreasing preference:

- Avoidance – Stop the propagation of the problem in the functional system
- Reduction or control – Reduce the probability or the impact of the problem
- Acceptance – Acknowledge and then define ways to handle the problem

The fact that impacted interfaces and all causes are addressed ensures completeness. The review performed by experts of both the application of the process and the list of mitigation actions is aimed at the correctness of the mitigation strategy.

The risk mitigation actions for the planned degraded modes were identified in paragraph 2.1.5.10, and are:

ID	Description
R1.	The new Porto Santo maintenance team shall be trained to maintain the new radar.
R2.	The new Porto Santo radar shall detect cooperative non Mode S equipped aircraft.
R3.	External partners (ONDA & ENAIRE) shall be informed of the change in the data format.
R4.	Verify that the Tracking outputs from ARTAS are identical to the current operational ones.
R5.	Verify that the Automatic Air Traffic Monitoring outputs are not changed.
R6.	Verify that the Air Coupler outputs are not changed.
R7.	Verify that Air Coupler enablers are capable of processing Mode S radar data.
R8.	Verify that the Surveillance views are not changed
R9.	Verify that Air Surveillance Presentation enablers are capable of displaying Mode S radar data.
R10.	Ensure that the adjacent centres are informed well in advance of Porto Santo outage.
R11.	Propose alternate surveillance means to adjacent centres.
R12.	Enable the display of flight plan tracks in the Madeira Sector and part of the West sector.
R13.	Tune ATM system to ensure higher adherence of flight plans to surveillance data.
R14.	Include the new points in the surveillance display systems.
R15.	Review the radar degradation tables for en-route, including Madeira sector.
R16.	Develop degradation tables for Madeira TMA.
R17.	Implement a procedure to print contingency flight strips.
R18.	Define contingency procedures for surveillance failures affecting the Madeira sector.
R19.	Define the Madeira sector capacities for contingency operations.
R20.	Assess the safety of the contingency procedures for the Madeira sector.
R21.	Train the contingency procedures for surveillance failures affecting the Madeira sector.
R22.	Publish the contingency procedures for surveillance failures affecting the Madeira sector.
R23.	Perform Operational Safety Assessment of the possible impacts of Surveillance views, including a geographical analysis.
R24.	Evaluate Porto Santo radar performance and analyse shortcomings and their impact.

Table 10: Risk mitigation actions

The risk mitigation actions for normal operations were identified in paragraph 2.2.3, and are:

- R2. The new Porto Santo radar shall detect cooperative non Mode S equipped aircraft.
- R3. External partners (ONDA & ENAIRE) shall be informed of the change in the data format.
- R4. Verify that the Tracking outputs from ARTAS are identical to the current operational ones.
- R6. Verify that the Air Coupler outputs are not changed.

- R7. Verify that Air Coupler enablers are capable of processing Mode S radar data.
- R8. Verify that the Surveillance views are not changed
- R9. Verify that Air Surveillance Presentation enablers are capable of displaying Mode S radar data.

3.3.2.2 Argument 3.2.1 – Mitigation is feasible

All mitigation actions are validated with the subject matter experts. The list of mitigation actions is reviewed and responsibilities for their implementation are allocated. The responsible for the mitigation actions validate them and propose alternatives in case they are not feasible.

3.3.2.3 Argument 3.2.1 – Mitigation is tracked

The defined risk mitigation actions are being followed. The following tables cover the current status of risk mitigation actions, which are in fact safety requirements:

ID	Action / Notes	Plan	Status
R1.	Train maintenance team.	AM	Planned
R2.	Requirement	AM	
R3.	Spain, Morocco and Santa Maria were informed.	2018	Completed
R4.	Evaluation of the tracker outputs will be performed.	2Q 2019	Planned
R5.	A test will be performed.	2Q 2019	Planned
R6.	A test will be performed.	2Q 2019	Planned
R7.	To be checked.	Asap.	Planned
R8.	A test will be performed.	1Q 2019	
R9.	To be checked.	Asap.	Planned
R10.	Spain, Morocco and Santa Maria were informed.	2017	Completed
R11.	ADS-B data from Madeira WAM system was proposed. Integration in Santa Maria is completed. Spain reported no interest. Morocco is evaluating.	2017	Completed.
R12.	Flight plan tracks are available. The functionality and the HMI were validated during the ATCO training.	3Q2018	Completed
R13.	The tuning was tested and validated during the ATCO training.	2Q2018	Completed
R14.	The display maps were changed.	3Q2018	Completed.
R15.	Radar degradation tables were reviewed and now cover the Madeira sector and its surveillance means.	3Q2018	Completed.
R16.	The new radar separation minima for the Lisbon FIR were published in IS 025/TRALIS/18.	October 2018	Completed.
R17.	A tactical procedure exists. The supervisor requests that a flight data assistant prints the contingency flight strips.		Completed.
R18.	A working group was set up to define the contingency procedures, and these procedures are described in AIP SUP032/2018. (Ref. [11])	2Q2018	Completed.
R19.	An email message was sent to NMOC with the he Madeira sector capacities for contingency operations: • <i>WITH WAM/WITHOUT MSSR – 16/H</i> • <i>WITHOUT WAM/WITHOUT MSSR – 9/H</i>	11 th October 2018	Completed.
R20.	The contingency procedures were evaluates using simulation and during the training sessions. (Ref. [10])	2Q2018	Completed
R21.	The training plan was defined in IS 079/18/CONLIS (Ref. [10])	2Q2018	Completed.
R22.	Contingency procedures for surveillance failures affecting the Madeira sector were published in AIP SUP032/2018.	3Q2018	Completed.
R23.	ASO was performed.	2018	Completed
R24.	Evaluation of the sensor will be performed.	2Q 2019	Planned

Table 11: Implementation of risk mitigation actions

3.3.3 Argument 3.3 – Monitoring

3.3.3.1 CR01

ATCO and supervisors are required to report all safety related occurrences to NAPATM. This department then processes and forwards the reports to the official entities. The aim of the analysis carried out by NAPATM is to identify risk areas in the ATM system, evaluate the safety performance and its trends as well as monitor the impact of changes to the ATM system and take remedial action when required. These procedures ensure that compliance with safety criteria CR01 is monitored.

3.3.3.2 CR02

The surveillance system performance is continuously monitored and deviations are promptly reported and acted upon. NAV Portugal performs real time monitoring of the surveillance infrastructure to verify that the integrated surveillance data, also known as surveillance picture, is fit for purpose, i.e. complies with the requirements for the separation minima applied in each area.

The performance of the sensors (F-9.4.2.1: Sensor & Local Tracking) and the tracker is evaluated every month, using the EUROCONTROL SASS-C tool. This evaluation covers probability of detection, accuracy, false target rate and bias measurements and checks the compliance with ESASSP requirements for the separation minima applied in each area.

The purpose of these analyses is to have an early detection of problems and avoiding any impact on the provision of air traffic services.

Appendix A - Traceability to regulation EU 1035/2011

	Proposed process
<p><i>3.2. Safety requirements for risk assessment and mitigation with regard to changes</i></p> <p><i>3.2.1. Section 1</i> <i>Within the operation of the SMS, providers of air traffic services shall ensure that hazard identification as well as risk assessment and mitigation are systematically conducted for any changes to those parts of the ATM functional system and supporting arrangements within their managerial control, in a manner which addresses:</i> <i>(a) the complete life cycle of the constituent part of the ATM functional system under consideration, from initial planning and definition to post-implementation operations, maintenance and decommissioning;</i> <i>(b) the airborne, ground and, if appropriate, spatial components of the ATM functional system, through cooperation with responsible parties</i> <i>(c) the equipment, procedures and human resources of the ATM functional system, the interactions between these elements and the interactions between the constituent part under consideration and the remainder of the ATM functional system.</i></p>	<p>This safety cases covers from initial planning to operations. Decommissioning is addressed as any other change.</p> <p>The MARIA model covers the whole scope of NAV Portugal ANS and ATM services and can be considered complete at each level of detail. It covers all the elements including equipment, procedures and human resources. The followed process analysis all the components including airborne, ground and special, if applicable.</p>
<p><i>3.2.2. Section 2</i> <i>The hazard identification, risk assessment and mitigation processes shall include:</i> <i>(a) a determination of the scope, boundaries and interfaces of the constituent part being considered, as well as the identification of the functions that the constituent part is to perform and the environment of operations in which it is intended to operate;</i> <i>(b) a determination of the safety objectives to be placed on the constituent part, incorporating:</i> <i>(i) an identification of ATM-related credible hazards and failure conditions, together with their combined effects;</i> <i>(ii) an assessment of the effects they may have on the safety of aircraft, as well as an assessment of the severity of those effects, using the severity classification scheme set out in Section 4;</i> <i>(iii) a determination of their tolerability, in terms of the hazard's maximum probability of occurrence, derived from the severity and the maximum probability of the hazard's effects, in a manner consistent with Section 4;</i> <i>(c) the derivation, as appropriate, of a risk mitigation strategy which:</i> <i>(i) specifies the defences to be implemented to protect against the risk-bearing hazards;</i> <i>(ii) includes, as necessary, the development of safety requirements potentially bearing on the constituent part under consideration, or other parts of the ATM functional system, or environment of operations;</i> <i>(iii) presents an assurance of its feasibility and effectiveness;</i></p>	<p>The scope is a determined, covering the boundaries and interfaces of the constituent part being considered, as well as the identification of the functions that the constituent part is to perform and the environment of operations in which it is intended to operate.</p> <p>See paragraphs:</p> <ul style="list-style-type: none"> • 2.1 - Change scope • 2.1.1 - Changed components • 2.1.2 - Affected units • 2.1.3 - Affected interfaces and interactions <p>The unit FHA, done using MARIA, identifies hazards at service level by analyzing all the data flows that are output by the unit functional system. An assessment of the effects of the hazards on the safety of aircraft, as well as an assessment of the severity of those effects, is performed using the referenced severity classification scheme. The probability of occurrence of the hazard as well as the probability of the hazard's effects is documented in the unit's FHA.</p> <p>New hazards will only arise due to changes to the outputs of the functional system. These changes are detected by the proposed approach, in both nominal and degraded modes of operation.</p> <p>By following the change impact until it can be demonstrated that the impact is not propagating further, proposed approach evaluates the impact on existing hazards.</p> <p>See paragraphs:</p> <ul style="list-style-type: none"> • 2.2 - Normal operations • 2.1.5 - Planned degraded modes <p>For the risk mitigation strategy see paragraphs:</p>

<p>(d) verification that all identified safety objectives and safety requirements have been met:</p> <p>(i) prior to its implementation of the change;</p> <p>(ii) during any transition phase into operational service;</p> <p>(iii) during its operational life;</p> <p>(iv) during any transition phase until decommissioning.</p>	<ul style="list-style-type: none"> • 2.2.3 - Mitigation actions for Normal Operations • 2.1.5.10 - Mitigation actions for planned degraded modes <p>Safety objectives are not defined.</p>
<p>3.2.3. Section 3</p> <p>The results, associated rationales and evidence of the risk assessment and mitigation processes, including hazard identification, shall be collated and documented in a manner which ensures that:</p> <p>(a) complete arguments are established to demonstrate that the constituent part under consideration, as well as the overall ATM functional system are, and will remain tolerably safe by meeting allocated safety objectives and requirements. This shall include, as appropriate, specifications of any predictive, monitoring or survey techniques being used;</p> <p>(b) all safety requirements related to the implementation of a change are traceable to the intended operations/ functions.</p>	<p>This is covered in the safety argument presented in paragraph 3 - Safety Argument.</p>
<p>3.2.4. Section 4</p> <p>Hazard identification and severity assessment</p>	<p>A systematic identification of the hazards shall be conducted. Severities are allocated in the FHA for each unit in accordance with the referenced classification scheme.</p> <p>Safety objectives are not defined.</p>
<p>3.2.5. Section 5</p> <p>Software safety assurance system</p>	<p>Covered in Safety Manual and ED153 compliance matrix.</p>

Appendix B - Traceability to regulation 2017/373 AMC & GM

The table below provides information on how the process proposed above complies with regulation EU 2017/373 and its Accepted Means of Compliance (AMC) and Guidance Material (GM) for the requirements related to changes to a functional system, namely:

- ATM/ANS.OR.A.045 Changes to a functional system
- ATS.OR.205 Safety assessment and assurance of changes to the functional system.

Conformity assessment table

	Proposed process
ATM/ANS.OR.A.045 Changes to a functional system	The proposed approach aims at being fully compliant with ATM/ANS.OR.A.045. (1) See Justification. (2) See Justification
<p>AMC1 ATM/ANS.OR.A.045(a) Changes to a functional system</p> <p><i>(b) Early and accurate notification facilitates the interactions between the provider and the competent authority and, thus, maximises the likelihood of introducing a change into service in due time according to the service provider's initial schedule when the competent authority has decided to review an assurance case. Therefore, it is advisable that the change description identified in AMC1 ATM/ANS.OR.A.045(a) is completed as soon as possible and contains the following data:</i></p> <p><i>(1) Purpose of the change;</i> <i>(2) Reasons for the change;</i> <i>(3) Place of implementation;</i> <i>(4) New/modified functions/services brought about by the change;</i> <i>(5) High-level identification of the constituents of the functional system being changed, and what is modified in their functionality;</i> <i>(6) Consequence of the change, i.e. the harmful effects of the hazards associated with the change</i></p> <p><i>(f) For air traffic services (ATS) providers, the consequences of the change specified in (b)(6), should be expressed in terms of the harmful effects of the change, i.e. the effects of the hazards associated with safety risks. These could be the result of a preliminary safety assessment, if available, or an early hazard analysis that concentrates on the service level effects.</i></p>	<p>The proposed approach supports the understanding of the change and provides the information required for notification of changes, points (3), (4) and (5), at an earlier stage.</p> <p>The MARIA model covers the whole scope of NAV Portugal ANS and ATM services and can be considered complete at each level of detail. To ensure that the scope of the change is completely and correctly identified, it is described by pin-pointing the elements of the MARIA model for NAV Portugal that are changed.</p> <p>The next step is to identify all the units that are affected by the change. This is done by checking the presence of the changed elements in the different units. In addition expert judgement is used to complement and validate the results. The impact on the specific units is made explicit and covered in the global assessment.</p> <p>See paragraphs:</p> <ul style="list-style-type: none"> • 2.1 - Change scope • 2.1.1 - Changed components • 2.1.2 - Affected units • 2.1.3 - Affected interfaces and interactions <p>(6) The unit FHA, done using MARIA, identifies hazards at service level by analyzing all the data flows that are output by the unit functional system. The distance between these hazards and the harmful effects is lower making it easier to associate them.</p> <p>As the same model is used the consequence of the change on the functional system hazards is obtained via the analysis of affected interfaces and interactions, performed in 2.1.3. The same approach can be used for both nominal and degraded modes of operation.</p>
<p>GM1 ATS.OR.205(a)(1) GM2 ATS.OR.205(a)(1) GM1 ATS.OR.205(a)(1)(iii) And GM4 ATM/ANS.OR.C.005(a)(1) GM6 ATM/ANS.OR.C.005(a)(1)</p>	<p>The proposed approach supports compliance with the listed guidance material.</p> <p>See paragraphs:</p> <ul style="list-style-type: none"> • 2.1 - Change scope • 2.1.1 - Changed components • 2.1.2 - Affected units • 2.1.3 - Affected interfaces and interactions

<p>ATS.OR.205 Safety assessment and assurance of changes to the functional system</p>	<p>The proposed approach aims at being fully compliant with ATS.OR.205</p>
<p><i>Not compliant yet:</i> <i>(2) the determination and justification of the safety criteria applicable to the change in accordance with point ATS.OR.210;</i></p>	<p>(a) The safety assessment covers the scope of the change: (i) the equipment, procedural and human elements being changed; (ii) interfaces and interactions between the elements being changed and the remainder of the functional system; (iii) interfaces and interactions between the elements being changed and the context in which it is intended to operate; (iv) the life cycle of the change from definition to operations including transition into service; (v) planned degraded modes of operation of the functional system; (b) The safety assessment comprises: (1) the identification of hazards; (3) the risk analysis of the effects related to the change; (4) the risk evaluation and, if required, risk mitigation for the change such that it can meet the applicable safety criteria; (5) the verification that: (i) the assessment corresponds to the scope of the change; (ii) the change meets the safety criteria; (6) the specification of the monitoring criteria necessary to demonstrate that the service delivered by the changed functional system will continue to meet the safety criteria.</p>
<p>AMC1 ATS.OR.205(b)(1)</p> <p>COMPLETENESS OF HAZARD IDENTIFICATION <i>The air traffic services provider should ensure that hazard identification:</i> <i>(a) targets complete coverage of any condition, event, or circumstance related to the change, which could, individually or in combination, induce a harmful effect;</i> <i>(b) has been performed by personnel trained and competent for this task; and</i> <i>(c) need only include hazards that are generally considered as credible.</i></p>	<p>The unit FHA, done using MARIA, identifies hazards at service level by analyzing all the data flows that are output by the unit functional system. During the FHA sessions the experts assess the credibility of each hazard, As for the analysis of the change links its impact to the outputs of the system, compliance with AMC1 ATS.OR.205(b)(1) is achieved.</p>
<p>AMC2 ATS.OR.205(b)(1)</p> <p>HAZARDS TO BE IDENTIFIED <i>The following hazards should be identified:</i> <i>(a) New hazards (...)</i> <i>(b) Already existing hazards that are affected by the change and are related to:</i> <i>(1) the existing parts of the functional systems; and</i> <i>(2) hazards outside the functional system, for example, those inherent to aviation.</i></p>	<p>New hazards will only arise due to changes to the outputs of the functional system. These changes are identified by the proposed approach, in both nominal and degraded modes of operation. By following the change impact until it can be demonstrated that the impact is not propagating further, proposed approach evaluates the impact on existing hazards. See paragraphs: <ul style="list-style-type: none"> • 2.2 - Normal operations • 2.1.5 - Planned degraded modes • 2.1.5.8.1 - Planned degraded modes – External hazards • 2.2.1.1.1 - Normal operations – External hazards </p>

<p>GM1 ATS.OR.205(b)(1)</p> <p>Methods to identify hazards <i>(2) The air traffic services provider needs to make sure that the method is appropriate for the change and produces (either individually or in combination) a valid (necessary and sufficient) set of hazards. This may be aided by drawing up a list of the functions associated with part of the functional system being changed. The air traffic services provider needs to make sure their personnel that use these techniques are appropriately trained to apply these methods and techniques.</i></p>	<p>Fully compliant. The list of functions associated with part of the functional system being changed is systematically identified with the help of a model. The process to identify hazards is clearly defined and applied by trained staff.</p>
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