


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 12-007 [Published on 01 February 2012 and officially closed for comments on 29 February 2012]

Commenter 1: FAA – Alan B. Strom – 01/02/2012

Comment # 1

Under "Required Action(s) and Compliance Time(s)", the criteria describing the shop visits where compliance is required is vague. The FAA cannot use terms such as "Level 3 shop visit" because it is not specific enough to be enforceable under our rules.

In order to ensure that our associated FAA AD uses the same criteria as the EASA AD for when an inspection is required, I recommend you change the AD to define the applicable shop visits more clearly. I recommend you describe the shop visits in terms of the physical level of disassembly of the engine; e.g., "any maintenance where Module 05 has been removed from the engine," or "any maintenance where all the blades are removed from the high pressure turbine."

EASA response: Comment agreed.

The wording of the Final AD has been amended to provide a description of the physical level of disassembly.

Commenter 2: GE Aviation – Martyn Carpenter – 03/02/2012

Comment # 2

Paragraph (2) of Required Action(s) and Compliance Time(s):

States that if the accumulated life in cycles of the IPT disc exceeds the inspection threshold but is below the maximum life as identified in the applicable Time Limits Manual, remove the disc from the engine and accomplish an inspection in accordance with the instruction of section 3 of the NMSB.

Paragraph (3) of Required Action(s) and Compliance Time(s):

States that if the affected disc has reached or exceeded its life limit as specified in Appendix 1 or 2 of the NMSB as applicable, before returning the engine to service, replace the disc with a serviceable part. Does this mean that regardless of whether the subject discs have exceeded the inspection threshold or not that they are subject to the inspection per the NMSB? Also, the NMSB, section D.2. states that for discs with a cyclic life greater than the inspection threshold as defined in Appendix 1 or 2 must be inspected in accordance with 3. Accomplishment Instructions prior to further use.

Are discs that exceed the inspection threshold but pass inspection allowed to be refitted to engines and returned to service? (I understand that this is very unlikely due

to there being no more than 500 cycles of life remaining.)

Paragraph (3) of Required Action(s) and Compliance Time(s):

States that If the results of an inspection as required by paragraph (1) of this AD... The inspection criteria is defined in Paragraph (2) of the AD. Part number discs LK82335 are not listed in the Part Reference list of the SQUID inspection, NMSB Appendix 4. Does this mean they are to be automatically replaced with non affected discs?

Any disc that was highlighted to us that had exceeded the inspection threshold but not the maximum life per the Time Limits Manual, we would automatically refer back to RR, but there is no instruction to do this in either the NMSB or AD.

EASA response: Comments partially agreed.

Paragraph (3) specifies that only a part that does not meet the inspection criteria, or that has reached or exceeded its limit as specified in the NMSB) must be replaced. An AD contains instructions to correct – if a part passes an inspection, an AD does not ‘require’ an operator to re-install the part, although that would be the logical follow-up action. It is true that, in accordance with established practice, such a part must be removed before exceeding the maximum life. The final AD has not been amended in response to this part of the above comment.

Regarding reference to the TC holder in the case for a certain part the inspection threshold but not the life per the Time Limits Manual is exceeded, neither the AD nor the NMSB need to prescribe this. Both the NMSB and the AD are unambiguous and specify for these cases where the inspection threshold is exceeded but not the maximum life that the part can be returned to service if the part has passed the inspection criteria and that the part needs to be scrapped, if otherwise.

Indeed, there is an inconsistency between the part number designations provided in paragraph 1.C. and Appendix 4, “SQUID inspection of RB211 IP Turbine Disc QTCP” of the NMSB. In Appendix 4, “SQUID inspection of RB211 IP Turbine Disc QTCP” of the NMSB the part reference UL82335 should read LK82335.

The Compliance section of the Final AD has been amended with a note to mention this typographical error in the NMSB. It is anticipated that a future revision of the NMSB will correct this typographical error.