

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-074

[Published on 05 May 2020 and officially closed for comments on 02 June 2020]

Commenter 1: Cathay Pacific – Bharat Yadav – 28/05/2020

Comment # 1

1. The industry standard term for Detailed Visual Inspection is “DVI”. Please use this term rather than “DET”.
2. Can the PAD separately group the AISB/VSB that are for inspections and modifications?
3. If the closing actions are to be performed at overhaul then then VSB for Modified Pin should also be listed in the AD. VSB 470-32-841 is not shown in the PAD. Please ensure all appropriate VSB are referenced within the PAD.
4. TABLE 1 and TABLE 2 - Please change the following
 “Within 30 months since pin first installation on an aeroplane”
 To
 “Within 30 months since affected pin first flight on an aeroplane”
5. “Out-Of-Roundness Check” –
 This paragraph requires clarity so that the results can be know when you also consider that it is a driver for (6) of the PAD.
 Please consider whether the wording should be changed to
 QUOTE
 For Group 2 Aeroplanes: Within 45 days after pin replacement as required by paragraph (2) feedback the findings of an out-of-roundness check to the pin manufacturer in accordance to the instructions of the pin manufacturer SB.
 END QUOTE
 The 45 days captures the shipping and lab work.



6. Point (6) – If there are findings then Operators are requested to feedback to SAFRAN. Once this data have been fed back the PAD should state whether
 - a. If the aircraft allowed to remain in-service? Any operating limitations? FC, MTOW, MLW??
 - b. Or can the PAD state that a maximum of 2 FC are allowed to return the aircraft to main base for follow up maintenance actions? At present the wording is ambiguous and open to interpretation whereas the final AD should be direct and clear on the aircraft status while awaiting SAFRAN feedback.
7. For (10) - Note that SB 32-6120 mentions "introduction of new pins with improved corrosion protection cancels the need to apply AOT A32W008-16.". Please review and confirm that MPD 321100-11-1 is fully complied with and when the MPD will be updated to incorporate that change e.g. MPD effectivity to Pre- 32-6210 a/c only.
8. For (11) – Note SB 32-6121 compliance cancels GVI of SB 32-6119. Please review and confirm that MPD 321100-11-1 is fully complied with and when the MPD will be updated to incorporate that change e.g. MPD effectivity to Pre-32-6121 only.

EASA response:

1. Comment noted. The type of inspection referred to in EASA PAD 20-074 is DET, as specified in the AOT and used in Airbus documentation (for instance in Airbus MPD). Although the wording “detailed visual inspection” is still used sometimes, the wording “ detailed inspection” is the correct definition for DET to include the possibility of tactile examination. The Final AD has been amended accordingly by removing the word “visual” from the definition of DET.
2. Comment noted. In the Definitions section of the PAD, documents are grouped by action and listed in the sequence these actions appear in the PAD: (1) AOT for DET, (2) pin replacement SBs, (3) pin manufacturer SB for out-of-roundness check, (4) GVI inspection SBs, (5) spacer replacement SBs. In the Ref. Publications section of the PAD, the documents are (according to AD standard) listed in numeric order. Both ways of presenting the documents may be useful. Therefore, in the Final AD, the Definitions section has been amended, where necessary, to clearly associate each publication with the respective action, while the Ref. Publications section remains unchanged.
3. Comment disagreed. SAFRAN Landing Systems VSB 470-32-841 is not listed in the PAD because its content is covered through a respective Airbus SB (A300-32-0469, A300-32-6120, A300-32-9025), which is listed under Ref. Publications. The same applies for SAFRAN Landing Systems VSB 470-32-842, which is covered by Airbus SB A300-32-0470, A300-32-6121 and A300-32-9026. On the contrary, SAFRAN Landing Systems VSB 470-32-840 is listed in the PAD as it is not covered by an Airbus SB. No changes have been made to the Final AD in response to this comment.



4. Comment agreed. In the Final AD, the compliance time has been amended to read: “Within 30 months since affected pin first flight on an aeroplane”.
5. Comment noted. The compliance time of 30 days is related to the shipping of the J-pin following pin replacement (refer to the applicable pin replacement SB). This does not include reporting of the results. Results must be reported within 15 days if no findings, and within 24 hours in case of findings, refer to corrective action paragraph (6). In the Final AD, the wording of paragraph (3) has been amended to refer to the compliance time for reporting results.
6. Comment disagreed. The requested information cannot be provided at this stage. Following the out-of-roundness check measurement results, SAFRAN Landing Systems, with the support of Airbus, will provide adequate instructions to operators on a case by case basis. No changes have been made to the Final AD in response to this comment.
7. Comment noted. It is confirmed that the MPD will fully comply with the changes introduced by the AD: e.g. in the Applicability column of the A300-600 MPD 321100-11-1, “ALL” will be replaced with “PRE 13859 (32-6120)” or similar wording, in line with the current wording for task 321114-01-1. A300-600 MPD update is scheduled for November 2020. No changes have been made to the Final AD in response to this comment.
8. Comment noted. A300-600 MPD update is scheduled for November 2020. No changes have been made to the Final AD in response to this comment.

Commenter 2: UPS – Muluken Zeru – 30/05/2020

Comment # 2

Reference:

- A. Airbus Alert Operators Transmission (AOT) A32W008-16 Revision 01.
- B. Airbus Service Bulletin (SB) [A300]-32-6120
- C. Airbus SB A300-32-0470, SB A300-32-6121



United Parcel Services (UPS) operates Fifty-two (52) A300-600 airplanes since the year 2000 and would like to comment on the proposed EASA PAD No. 20-074 - ATA 32 – Landing Gear – Main Landing Gear Hinge Arm / Barrel – Pin Replacement / Inspection / Spacer Modification.

UPS has been inspecting main landing gear hinge arm barrel pins since the issuance of reference /A/ message in 2016. The detail visual inspection accomplished for the last 4 years every 100 flight cycles did not reveal any discrepancy on any UPS aircraft.

UPS is also accomplishing reference /B/ and /C/ service bulletins during gear overhaul at REVIMA, France repair facility. We have completed the inspection and modification on six landing gear ship sets. The attached report from SAFRAN, Landing Gear manufacturer, and REVIMA, repair vendor, show that there is no crack finding on UPS gears.

Based on UPS data that shows no finding, and industry findings during gear overhaul in the life of the A300 fleet limited to three, the 100 flight cycles detailed visual inspection with installation of new pin and spacer during gear overhaul is adequate to maintain the safety of the landing gear and aircraft.

If the above recommendation is not acceptable, UPS would like EASA to consider the pin replacement / inspection interval form 30 months to 48 months. The tooling required for replacement of pin are not currently available and have lead time of 12 weeks [...]. The effect of COVID 19 also makes it difficult to order and get tooling and parts in time to meet the 30 months compliance period. Pin replacement has to be accomplished at a facility where there is gear replacement expertise and adequate ground time that is normally done together with “C” check maintenance.

EASA response:

Comment disagreed.

The AOT specifies inspection of the hinge arm / barrel pin internal diameter, which will detect a crack only when it becomes a through crack, whereas the ISB allows detecting a potential crack at an earlier stage (i.e. hinge arm / barrel pin external diameter). It has therefore been determined to request installation of the new J-Pin at the earliest opportunity (C-Check).

The compliance time of 30 months should allow operators to accomplish the SB during a C-Check (30 months is the maximum time between 2 C-Checks on Airbus WB fleet). Note that the respective Airbus SBs were published in September 2019, whereas the AD sets the compliance time to “30 months after the AD effective date”. However, should there still be issues with the AD accomplishment timescale, UPS could request support from Airbus to obtain an AMOC to the respective FAA AD.

No changes have been made to the Final AD in response to this comment.

