



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-056

[Published on 20 April 2018 and officially closed for comments on 18 May 2018]

Commenter 1: Lufthansa Technik AG – Jann Rauschenberger – 14/05/2018

Comment # 1

- A. At the given statement of PAD 18-056 Lufthansa Technik will understand that the threshold and repetitive inspection interval is only applicable for parts installed on an aircraft. From technical point of view a Thrust Reverser (TR) once checked and stored in the shelf will not receive any damage by heat causes, bush migration or crack/deformation (those damages can only develop during operation). Therefore LHT understands that the given inspection threshold and interval is only applicable for TR units installed on the aircraft. Can EASA please confirm this?
- B. May be an additional statement (Note) can be added to the final AD to provide a clear statement regarding the inspection threshold and interval applicability. Alternatively LHT would support to set the inspection threshold and interval from “whichever occurs first” to “whichever occurs last” so the stored TR units will then not be inspected every 24mth.
- C. Inspection procedure acc. to § 3 of SB A330-78-3023 asks to send the inspection report to Airbus in accordance with RR SB RB211-78-AH677 (without any time requirement). RR SB RB211-78-AH677 itself requires to send inspection report to Safran Nacelles acc. to Safran NMSB 78-AH677. Safran NMSB 78-AH677 requests to send the reporting sheets to Safran Nacelles (without any time requirement). As the PAD does not have any reporting requirement can EASA please confirm that the AD will only mandate the inspection and not mandate the reporting to OEM's?

EASA response:

- A. Comment agreed. It is confirmed that the inspection of the TRU beam are only required for parts installed on an aeroplane. Stored TRU beams are not subject to the requirements of this AD, until being (re)installed. Upon (re)installation of a stored/spare TRU beam, the inspections are (re)started, as required by paragraph (5) of the AD.**
- B. Comment partially agreed. The notion of ‘whichever occurs later’ has been added, but for a different reason – FC and calendar time relate to those accumulated by the TRU beam, not necessarily by the aircraft on which it is installed. See also EASA answer to point A. above.**
- C. Comment agreed. Unless an AD explicitly requires reporting, following (or not) the relevant SB instructions is at the discretion of the operator. The Final AD has been amended in response to points A. and B. of this comment.**

