

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-036

[Published on 08 March 2019 and officially closed for comments on 22 March 2019]

Commenter 1: SIA Engineering Company – Mohamed Khasrul – 12/03/2019

Comment # 1

PAD 19-036 was issued on 08 March 2019 to accomplish SDI on each LH and RH TRU beam in accordance with the Airbus SB A330-78-3023 / NMSB RB.211-78-AH677. This PAD proposes to revise EASA AD 2018-0148 eff. 27 Jul 2018. It is noted that the initial inspection of EASA AD 2018-0148 has been revised to include compliance based on calendar months/FC since first installation of the TRU assembly. With reference to the Reason in the PAD, it has been found that FCs accumulated by a TRU beam are unknown.

Question: In view that the FCs accumulated by a TRU Beam is unknown and for consistency purposes, should the repeat inspection intervals be based on calendar months/FC accumulated by the TRU assembly since last inspection?

EASA response:

Comment not agreed. It is correct that for the initial inspection, the FC accumulated by a TRU beam could be unknown, hence the AD revision to allow for the initial inspection to consider the FC accumulated by the TRU. However, once the initial inspection is accomplished, the next inspection must be planned by using the (then known) FC accumulated by a TRU Beam.

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

Commenter 2: SAFRAN Nacelles – Gabriel Tassin – 22/03/2019

Comment # 2

We have reviewed the PAD 19-036 on SAFRAN Nacelles side and we thought we could take advantage of this revision to precise the location of the inspection in table 2 :

Table 2 – Detailed Inspection (DET) / Ultrasonic Inspection

TRU Position(s)	Inspection Method, Areas and Purpose
LH	DET of TR door beam latches (5, 6 and 7) for bush migration and crack/deformation
RH	DET of TR door beam clevises (5, 6 and 7) for crack/deformation
LH and RH	Ultrasonic inspection of TR door Outer Fixed Structure rear area for delamination

Indeed the AD is referring to the TRU beam as the area to be inspected everywhere throughout the document except in this table 2. We think it could be misleading as TR door could be understood as the pivoting door of the TR which is providing the reverse thrust when landing. Our proposal would be to rephrase the table 2 as follow to make sure the area for inspection will be understood by all the operators :

Table 2 – Detailed Inspection (DET) / Ultrasonic Inspection

TRU Position(s)	Inspection Method, Areas and Purpose
LH	DET of TR door TRU beam latches (5, 6 and 7) for bush migration and crack/deformation
RH	DET of TR door TRU beam clevises (5, 6 and 7) for crack/deformation
LH and RH	Ultrasonic inspection of TR door Outer Fixed Structure rear area for delamination

EASA response:

Comment agreed. The final revised AD has been amended accordingly in response to this comment.

