

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-096

[Published on 24 June 2020 and officially closed for comments on 22 July 2020]

Commenter 1: LATAM – Gabriela Quijada Melo – 26/06/2020

Comment # 1

According to the following references:

/Ref.1/ EASA PAD 20-096

/Ref.2/ AOT A25N019-19 Rev 01

- A. **Question about affected parts:** Despite the fact that both documents identify which are the evacuation systems, reservoir and valve assemblies, and spare inflation valve assemblies known to have shipped with the suspect rupture disc assemblies by Part Number (P/N) and manufacturing date. Ref. 2 provides additional information, a list of the affected Serial Number (SN) in each the applicable (VSB). Could this list of affected Serial Number (SN) given in each the applicable (VSB) be considered to define which parts are affected by this AD?
- B. **Comments about Appendix 1 of Ref. 1:** For Reservoirs and Valves Systems P/N 61639-203, the date of manufacturing range given is June 2017 through October 2018, but Ref. 2 establishes for the same part number a different date of manufacturing range, June 2017 through June 2019. Could you clarify this?

EASA response:

- A. **Comment agreed.** It is confirmed that the applicable SAFRAN SB, as referenced in the AD, should be used to determine by serial number which individual parts are affected. In the Final AD, the affected part definition has been amended accordingly.
- B. **Comment noted.** The manufacturing date range for Reservoirs and Valves Systems P/N 61639-203 is confirmed to be June 2017 to October 2018 inclusive, as specified in Appendix 1 of the AD. The AOT (Ref. 2) includes a note that data are based on, and operators should refer to, SAFRAN Service Information Letter (SIL) 25-419. SAFRAN are considering a revision of the SIL.

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



Commenter 2: Air France – Vincent Guille – 02/07/2020**Comment # 2**

In accordance with PAD 20-096, I have many questions.

- A. Why [is] the VSB 995-25-01 not listed? This VSB is listed on all other VSB.
- B. Why [is] the VSB 995-25-05 and 995-25-07 not listed?
- C. Can you confirm: the VSB 995-25-02 can be covered by VSB 004-25-117/118/120/121?
- D. Why [is] VSB 006-25-07 not listed into PAD 25-096?

EASA response:

- A. Comment agreed. SAFRAN SB 995-25-01 provides instructions (i.e. part identification/scrapping) for spare part rupture disk assemblies P/N B14268-1 which are not installed on an aeroplane. The AD does not require actions for spare parts not installed on an aeroplane. Upon installation of an affected spare part, paragraph (5) of the AD applies. SB 995-25-01 has been added to the list of Ref. Publications in the Final AD to facilitate identification of affected parts.**
 - B. Comment noted, but not agreed. SAFRAN SB 995-25-05 and SB 995-25-07 provide instructions for spare parts eligible for A350 aeroplanes only. These documents are not applicable to A318/A319/A320/A321 aeroplanes and therefore not listed in the AD.**
 - C. Comment partially agreed. SAFRAN SB 995-25-02 provides instructions for spare parts, i.e. those not installed on an aeroplane. The AD does not require actions for parts until they are installed on an aeroplane. Upon installation of an affected spare part, paragraph (5) of the AD applies. SAFRAN SB 004-25-117/-118/-120/-121 provide instructions for parts installed on an aeroplane. Reference to SAFRAN SB 995-25-02 was included in the Ref. Publications section of the Final AD only to facilitate identification of affected parts.**
 - D. SAFRAN SB 006-25-07 provides instructions for spare parts eligible for A350 aeroplanes only. See EASA answer to Point B. above.**
- No changes have been made to the Final AD in response to Points B., C. and D. of this comment.**



Commenter 3: Lufthansa Technik – Tim Nass – 02/07/2020**Comment # 3**

In the appendix 1 of the mentioned document, the affected parts are defined by the time- range of the manufacturing date. However, the mentioned SAFRAN SB's define the affected parts by their particular serial numbers. Has it been confirmed, that both ways refer exactly to the same affected parts? Does it make sense to unify the declaration of affected parts for simplicity & clarity?

EASA response:

Comment noted. Appendix 1 of the AD does not list the serial numbers (s/n) of affected parts for simplification. The s/n can be determined through the applicable SB. It is confirmed that, except for one discrepancy (shorter manufacturing date range for P/N 61639-203, see Comment #1 above), AD and applicable SB refer to the same P/N, manufacturing dates (range) and s/n.

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

Commenter 4: JETSTAR – Samuel Neilson – 14/07/2020**Comment # 4**

- A. Affected parts are listed as those with P/N and DoM ranges as detailed in Appendix 1. However in related AOT A25N019-19 R01, the affected parts are a subset of these, given by specific S/N lists in the related VSBs. Should PAD 20-096 also refer to related VSBs for specific S/Ns to define the affected parts list? Note that only using the DoM range to determine affected parts would include parts which are not applicable to the VSBs which provide a terminating action to the PAD repetitive pressure checks. Therefore these parts would always remain affected.
- B. Part of requirement (5) of the PAD calls for a pressure check upon installation of an affected part per AOT A25N019-19. Is this necessary given a pressure check is carried out per the AMM task for slide installation?



EASA response:

- A. Comment noted. All related SAFRAN SBs are referenced in the AD, section Ref. Publications. See EASA answer to Comment #1, Point A. above.**
- B. Comment noted. The AD requires this pressure check to be done in accordance with the instructions of the AOT, which refers to AMM task 25-62-00-210-001-A (Check slide reservoir pressure).**
- No changes have been made to the Final AD in response to Point B. of this comment.**

Commenter 5: Soh Kian Ann – Singapore Air – 16/07/2020 and 23/07/2020
Comment # 5

- A. EASA PAD 20-096 states the terminating action as carrying out modification of affected part in accordance with the instruction of the applicable SB, or replacing each affected part with a serviceable part in order to terminate the repetitive inspection of AD paragraph (1). Can EASA advise whether this modification is optional or mandatory?
- B. In addition to my previous query, I have the following query regarding the terminating action. Several Reservoir Assembly PN 18309-305 are found to be affected due to Manufacturing Date as listed in the Appendix 1 of the PAD. However, the valve system SN or DOM of these identified reservoir assemblies are found not affected as per the corresponding modification VSB's applicability. Please kindly advise whether we are still able to apply the terminating modification VSB on such units?

EASA response:

- A. Comment noted. The terminating action (modification or part replacement) is not required by this AD, and therefore optional. It is however recommended by AIRBUS in order to terminate the (need for) repetitive inspections.**
- B. Comment agreed. See EASA answer to Comment #1, Point A. above.**
- No changes have been made to the Final AD in response to Point A. of this comment.**



Commenter 6: Turkish Airlines – Tilbe Kerki – 16/07/2020**Comment # 6**

In Paragraph (1) of Required Actions P-AD 20-096, it is stated that pressure gauges of the parts, listed in Table 1, checked and in paragraph (4) modifying the affected parts would be the terminating action. However, the vendor SBs are not effective to the all parts manufactured between the dates given in Table 1. So, it could be understood that for some parts, there is no terminating action and pressure checks should continue. THY has 41 affected parts in accordance with the DOMs given in Table 1 but has only 14 parts affected by the vendor SBs. We kindly ask you to make the effectivity and required actions more clear before the final version of the AD is released.

EASA response:

Comment agreed. See EASA answer to Comment #1, Point A. above. Pressure checks are required only for affected parts, prior to installation – see paragraph (5) of the AD.

Commenter 7: United Airlines – Oscar Fernandez – 20/07/2020**Comment # 7**

United Airlines has reviewed EASA PAD 20-096 in its entirety and have no objections to the required compliance time. However, for the required actions specifically with respect to the slide pressure checks, we kindly ask EASA to allow operators to take credit for the slide pressure checks being performed by the Flight Attendants. At United Airlines, the slide pressure checks are required prior to each revenue flight and detailed in the Flight Attendant Operations Manual. If the slide pressure check fails, Maintenance is requested for confirmation and the slide is either replaced or placed on the Minimum Equipment List before further flight. United Airlines believes this action provides an equivalent level of safety.

EASA response:

Comment noted. Please contact the competent authority to assess whether the instructions contained in United Airlines Flight Attendant Operations Manual (FAOM) provide an equivalent level of safety to the instructions required by this AD with regard to Aircraft Maintenance Manual (AMM) task 25-62-00-210-001-A (Check slide reservoir pressure).

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



Commenter 8: Vueling – Jasone Garriga Echanojauregui – 13/08/2020**Comment # 8**

- A. [There are] SNR incongruences between the VSB and the appendix 1 of the AD. [...] The appendix 1 does not reflect the SNR effectivity "IAW the VSB" but only for the MFG dates. What if the encounter a slide with a MFG date between the AD MFG Date window and not in the VSB? VSB does not contain this SNR, so as per the AD appendix 1 should be inspected but it will never be terminated because it is not in the VSB [...] We have identified this situation in 15 more slides (all of them installed new in AIB production). VLG would strongly recommend EASA to reference the VSBs in the appendix 1 (as the AOT rev01 does).
- B. Another issue in regards with some shop practices IAW CMM and Zodiac Aerospace 25-141: There is a common practice in slide shops and this is to restore the slide by replacing a new inflatable sub-assembly. By doing this, the shop re-issues the Form1 by changing the serial number into X-RP or XRP, where X is the original Serial Number. Also the MFG date is restarted. [...] If a slide is not modified IAW with the VSB before the OVH is performed, the slide could not be inspected because the MFG data has been changed. Another situation could be is that many slides have to be inspected because after the OVH "RP" procedure they lie within the MFG dates window IAW AD/PAD appendix 1. Although we are aware that the OVH of these slides will not occur in less than 10 years now (MFG Date + OVH requirement), VLG would like to know if EASA has considered this potential situation.

EASA response:

A. Comment agreed. See EASA answer to Comment #1, Point A. above.

B. Comment noted: The replacement of the burst disk can only be performed when the slide is unpacked. There is a certain chance that the burst is accessible in a packed condition, but for burst disk replacement the reservoir must be discharged. The recharging can only be performed in the unpacked condition and this is normally done during a standard overhaul (off-aircraft action), hence it is logical to combine burst disk replacement with the scheduled overhaul. Therefore, no risk has been identified of introducing a new unsafe condition.

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

