

COMMENT RESPONSE DOCUMENT

EASA AD No.: 2024-0058

[Published on 04 March 2024 and officially closed for comments on 01 April 2024]

Commenter 1: China Airlines – Kuo-Cheng Chiang – 19/03/2024

Comment # 1

It is mentioned in the part(s) installation paragraph of EASA AD 2024-0058 that if the accumulated FC since the last leak test is unknown, a leak test needs to be completed after installation before the next flight.

China Airlines would like to clarify that if the PCE is installed for the first time after being sent for repair, does it still need to complete a leak test before the next flight?

EASA response:

Comment #1 - agreed.

If during shop repair visit a leak test was performed in accordance with CMP task 36-11-36, Paragraph 6, the leak test can be deferred until when such PCE will have accumulated 100FC after its post repair installation (or 5500FC since new, whichever comes later).

The AD has been revised accordingly to clarify the above.

Commenter 2: Qatar Airways – Yacoob Jugoo – 19/03/2024

Comment # 2

EASA AD 2024-0058 mentions the following statement in RACT (7) for Part(s) installation:

If the FC accumulated since last leak test are unknown, accomplish the leak test before next flight after installation.

Request(s):



Further to the above statement in Ref.1, QTR understand that installation of all the following PCEs is allowed provided that leak test is accomplished before next flight:

- a. A PCE where it is not known if leak test was accomplished previously
- b. A PCE where leak test was previously accomplished but the PCE life at accomplishment is not known and/or the remaining life till next leak test is not known.

EASA response:

Comment #2 - confirmed.

Both cases (a and b) are true for PCE which accumulated more than 5500FC or FC are not known. No changes have been made to the AD Revision in response to this comment.

Commenter 3: Cathay Pacific Airways Limited – Joanne Lai – 22/03/2024

Comment # 3

Pertaining to AD Para (7):

“Part(s) Installation:

(7) From the effective date of this AD, it is allowed to install a PCE on an aeroplane, provided, after that installation, leak tests of that PCE are accomplished as required by paragraph (1) of this AD. Following installation, the first leak test can be deferred until 5 500 FC since new (first installation) of that PCE on an aeroplane, or until 100 FC since last accomplishment of a leak test (no leak detected) in accordance with the instructions of the AOT, as applicable. If the FC accumulated since last leak test are unknown, accomplish the leak test before next flight after installation.”

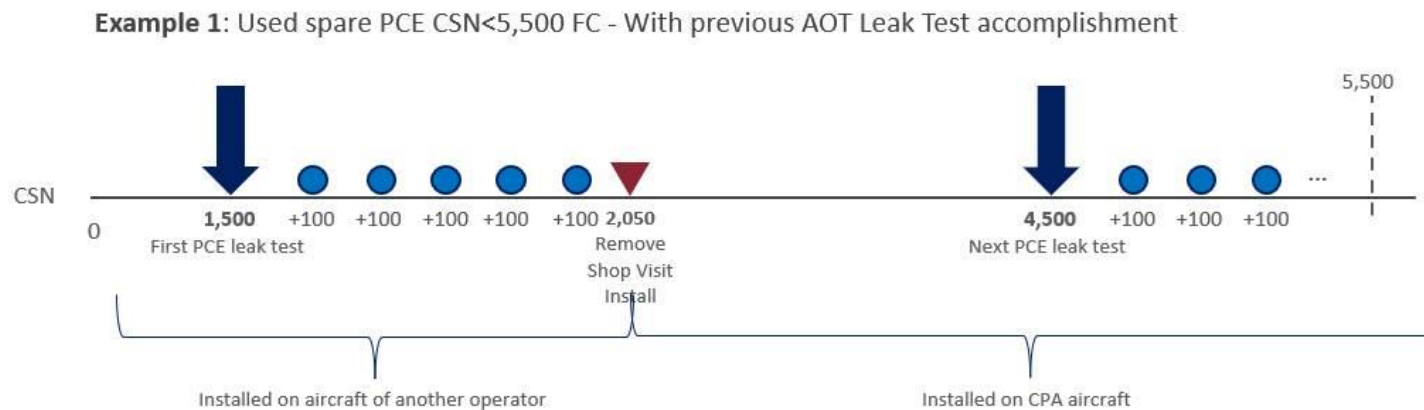
A. Clarification of requirement

CPA understands the requirements of AD Para (7) as follows :

- 1) If a new (Cycle Since New=0) PCE is installed on an aircraft as spare
 - The first leak test shall be performed before PCE CSN=5,500FC; thereafter, repeat every 100FC.
- 2) If a used PCE is installed on an aircraft as spare, with Cycle Since New<5,500FC
 - Even if a leak test was performed on the PCE previously at a lower Cycle Since New, after installation, the next leak test can be performed before the PCE reaches CSN=5,500FC

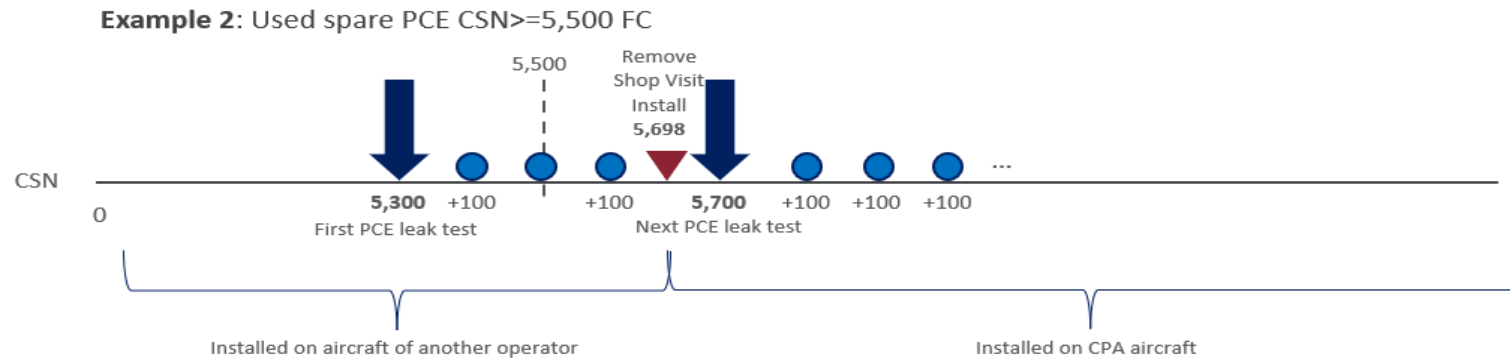


- Example 1: When the PCE unit was with a previous operator, the first leak test was accomplished per Airbus AOT A36P010-23, at CSN=1,500FC. 5 more repetitive leak tests were accomplished by the previous operator, 100FC apart (CSN=1600,1700,1800,1900,2000). Subsequently this unit was removed and send for shop visit at CSN=2,050FC. Later CPA receives and installs this unit at CSN=2,050FC. In this scenario, CPA can perform the next AOT PCE leak test at CSN=4,500FC (before CSN reaches 5,500) aligning with our maintenance input, thereafter, repeat every 100FC.
- If a leak test was never performed on the PCE previously, after installation, the first leak test can be performed before the PCE reaches CSN=5,500FC.



- In other words, the first leak test following installation can be performed before the PCE reaches CSN=5,500FC or 100FC since last accomplishment, whichever later.
- 3) If a used PCE is installed on an aircraft as spares, with CSN \geq 5,500FC
- An AOT PCE leak test should have been performed previously. The next leak test should be performed within 100FC since the last accomplishment.
 - Example 2: When the PCE unit was with a previous operator, the last leak test was accomplished at 5,600FC. The PCE later accrued 98 more FC and was removed and send for shop visit at CSN=5,698FC. Later CPA receives and installs this unit at CSN=5,698FC. In this scenario, CPA needs to perform the next leak test within 2FC, before PCE reaches 5,700FC. Thereafter, repeat every 100FC.





CPA seeks EASA's review to confirm the above understanding. If CPA's understanding is correct, CPA seeks EASA consideration to revise AD Para(7) verbiage as described in above.

B. Equivalent PCE shop tests

CPA wishes to enquire if there are any equivalent shop tests for the PCE that can be credited as one instance of AOT compliance, such that for spares PCE coming from the shop, the next PCE leak test is always due 100FC from installation?

As in the scenario of Example 2 above, if there are no acceptable shop tests that can be considered, operators must perform the next leak test 100FC from the previous accomplishment. If the PCE unit accrues more usage prior to removal, the margin to accomplish the next leak test is very tight and is challenging to arrange.

C. Acceptable PCE leak test procedure

Further to Q2, CPA understands that in the March 01 2024 revision of the A350 MP, MP A350-A-36-11-62-00001-720A-A (Installation of PCE) has been updated to require PCE leak test as per MP A350-A-36-11-XX-00ZZZ-360Z-A, which is the same leak test required in AOT A36P010-23.

For spare PCE, can the leak test done per the MP A350-A-36-11-XX-00ZZZ-360Z-A be credited as one instance of AOT compliance, such that the next PCE leak test is always due 100FC from installation?

EASA response:

Comment #3 A 1) - confirmed.

Comment #3 A 2) - Leak tests can be performed anytime by operators also taking the established maintenance plans, within the boundaries allowed by the AD requirements. As a consequence leak tests shall be performed in accordance with the procedure mentioned in the AOT before PCE CSN=5500FC; thereafter, they shall be repeated at intervals not greater than 100FC.



Comment #3 Example 1 - The scenario described appears to be in compliance with the AD requirements, but the AD doesn't require to perform the next leak test (after the last one at 4500FC) every 100 FC. The AD requires only to perform the first leak test at no later than 5500FC since new and then at intervals not greater than 100FC.

Comment #3 A 3) - confirmed. If no previous leak test was accomplished the AD requires to do a leak test in accordance with the AOT instructions after PCE installation and prior to AC return to service.

Comment #3 Example 2 – confirmed.

See also answer to Comment #1.

Comment #3 B – See answer to Comment #1.

Comment #3 C – not agreed.

In MP task A350-A-36-11-62-00001-720A-A Installation of the Bleed-Air Precooler Exchanger, it is requested to perform a leak test of the PCE and the related ducts and sense lines as per MP Task A350-A-36-11-XX-00001-360A-A - Leak Test of the Engine Bleed Air System (EBAS).

This MP task is different from MP task A350-A-36-11-XX-02001-360A-A Leak Test of the Bleed Air PreCooler Exchanger (PCE) on the Wing, which is the one to be performed as per AOT instructions.

Therefore it is not possible to give credit to the MP task Installation of the Bleed-Air PCE since the leak test called in it is different from the one requested by the AOT.

No changes have been made to the AD Revision in response to these comments.

Commenter 4: China Airlines – Cheng Tsung Lu – 26/03/2024

Comment # 4

In addition to bench test, Airbus maintenance procedure Task A350-A-36-11-62-00001-720A-A also include PCE leak test after installing on-wing. Therefore, CAL would like to clarify if AD mentioned additional work still required to comply.

EASA response:

Comment #4 – See answer to comment #3 C.

