


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 10-013 [Published on 21 January 2010 and officially closed for comments on 18 February 2010]

Commenter 1 : British Airways Plc - Neil Shipman – 25/01/2010

Comment # 1

Please be advised that the initial inspection instructions on PAD 10-013 do not include instructions to transition from previous revisions of RB.211-73-D685 prior to Revision (Rev) 3.

RB.211-73-D685 Rev 3 is not an Alert SB and may not have been completed by some airlines.

With no instructions to transition from previous versions of the SB, this AD will give airlines (who have not completed Rev 3 historically) 2 weeks from the initial publication date of the AD to complete the inspection on the fleet. This is not practicable.

Revision 3 was published on 18th September 2009 which is approximately 5 months before.

Is it EASA's intent to omit transition instructions from the initial inspection instructions and issue such tight deadlines to inspect engines in accordance with a non alert SB?

Should the wording in the initial inspection threshold refer to Rev 2 of SB RB211-73-D685?

EASA response:

Not agreed.

It is necessary to retain Rolls Royce Non Modification Service Bulletin RB211-73-D685 revision 3 as the baseline because this revision extended the inspection to cover additional pipes. Please note however that the compliance time for accomplishing the initial inspection has been extended to 2 000 hours or 3 000 hours.

Commenter 2: American Airlines – John Beavers – 16/02/2010

Comment # 2

AAL offers the following comments in response to Reference (1) PAD.

The "Required Action(s) and Compliance Time(s) Table" states to accomplish the inspection for frottage in accordance with Rolls Royce NMSB 73-D685 R3. Reference (2) NMSB 73-685 R4 was released on 20 January 2010, which is acceptable for use per the PAD "Ref. Publications Table". In this revision, "Accomplishment

Instructions” steps 3.A.(3) and 3.B.(3) were revised to inspect the clips and to reject if any damage or deterioration is found. However, all the steps below state to fit “new” clips:

- 3.A(6)(b)(vii)-(viii)
- 3.A(6)(d)(vi)
- 3.A(6)(f)(vii)
- 3.A.(7)
- 3.B.(6)
- 3.B.(7)

We propose that the AD states that the clips may be reused if there is no evidence of damage or deterioration, in accordance with the revised step (3) of Reference (2) NMSB.

EASA response:

Not agreed.

EASA would not propose to comment about clip disposition in the related AD and, in the meantime, the issue is now clarified with Rolls Royce NMSB 73-D685 R5.