

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 15-017 [Published on 26 February 2015 and officially closed for comments on 26 March 2015]

Commenter 1: Virgin Atlantic Airways Ltd – Jim Guneratnam – 27/02/2015

Comment # 1

1. In “Reason” section of the PAD, the penultimate paragraph describes the action to be taken by the operators to demonstrate compliance, specifically it states to implement the changes in the AMP.

However, “Required Actions and Compliance Times” Section in Items (2.1) and (2.2) state that the Repair Records need to be changed to reflect the changed ICA requirements.

Hence, there is a possibility for misunderstanding by operators.

In order to synchronise the “Reason” paragraph statement with the “Required Action” statement, it is suggested that the penultimate paragraph in “Reason” Section be changed as follows, given in [] brackets:

[To address this unsafe condition, Airbus issued SRM revision dated April 2013 and temporary revision (TR) 53-001 for the STGR9 junction between FR10 and FR13 area (and subsequent revisions) to introduce reduced thresholds and intervals for the affected ADLs and repairs and issued a set of Airbus Service Bulletins (SB) to enable operators to update aeroplane repair records.]

Please note that the change is underlined and marked up in red.

2. In the ultimate paragraph of “Reason” section, a few words at the end of the sentence did not come out well or gone missing.

A proposed version is provided below:

For the reasons described above, this AD requires identification of any repairs and/or ADL used to assess or control any structural damage on certain structural areas and, depending on findings, corrective action(s) be implemented.

Please note that the change is underlined and marked up in red.

EASA response:

Point 1: Comment agreed.

Point 2: Comment agreed.

The Reason section of the final AD has been amended in response to this comment.

Commenter 2: Airbus – Yann Merzeau – 03/03/2015**Comment # 2**

Amendment of paragraph (2) proposed in red:

(2) If, during the review, as required by paragraph (1) of this AD, it has been determined that a SRM ADL **or repair** specified in Table 1 of this AD was used to assess or control any structural damage and/or any structural repair was accomplished in accordance with the instructions of **any** SRM revision or SRM TR, **except** those specified in Table 2 of this AD (or any later approved SRM or SRM TR revisions), depending on aeroplane configuration and within the compliance time defined in Appendix 1 of this AD, accomplish action (2.1) or (2.2) of this AD, in accordance with the instructions of applicable Airbus SB, as applicable.

EASA response:

Comment not agreed. The paragraph already contains the reference to “and/or any structural repair was accomplished”. ADL are used to assess and control damage, whereas repairs are not used to assess, but accomplished.

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

Commenter 3: Scandinavian Airlines System – Iver S. Hansson – 05/03/2015**Comment # 3**

Point 1. PAD Subject – Inspection req'ment is not only for Doublers. Pls. add ADL.

Point 2. PAD Par (3). All damages are assessed when detected. Detection period may occur a nbr of FC/FH after damage occurrence due to no damage reports for some reason. In such cases, is it correct to claim that the a/c has been non-airworthy during those FC/FH?

Point 3. Pls. identify a situation in which an a/c is not in compliance with Par. (3).

SAS do recommend EASA to be careful when mandating damage assessment that is subject to a large area of the fuselage skin. Some areas are easily inspectable during walk around and A-checks, others are not. Mandating ADL's coming from the SRM may result in conflicts between the CAMO, Part 145, and local authority. The intention of Par (3) is fully acceptable, nevertheless we feel that the compliance aspect needs more details in order to prevent misunderstandings.

EASA response:

Point 1: Comment agreed. Title section has been amended in response to this comment.

Point 2: Comment understood, but not agreed. The requirement of paragraph (3) is prevent operators to use previous revisions of the SRM in the areas affected by the AD. There is no relation to a detection period after a damage occurs on an aeroplane.

Point 3: Comment agreed. The Final AD has been amended to refer to “data approved by EASA or Airbus, valid at the time of the (planned) repair or replacement”.

Commenter 4: Qantas – Ferdy Vidmar – 26/03/2015**Comment # 4**

In reference to the subject PAD, Qantas makes the following submission:

QFA acknowledges PAD 15-017 and appreciates the opportunity to comment on the proposed requirements. The following comments concern the requirements for the A330 aircraft type.

General comments:

The thorough review of aircraft records as required in the AD can take considerable time and manpower when the records are paper based and a reasonably large fleet is considered. While the need to update the SRI threshold and frequency for SRM repairs to account for the revised fleetwide usage figures is completely understood, it is suggested that an alternative means of compliance be provided that will alleviate the reasonably tight timeframe and allow for a more managed review while meeting the full requirements of the unsafe condition which is addressed by the AD. It is also noted that EASA have recently released AD 2015-0036 for the A318-A321 series aircraft that mandated an inspection for repair doublers and provided a review of aircraft maintenance records as an alternative means for complying with this requirement. On this basis, the following comments are made:

Point 1: REQUIRED ACTIONS:

The required actions only provide for the review of maintenance records to identify SRM repairs/ADL's that have been accomplished on the aircraft. In respect of SB A330-53-3234 and A330-53-3235, the repairs that need to be identified are physical repair doublers (Internal/External) which would clearly be visible on a fuselage survey. It is suggested that for these two bulletins, the AD provides for an inspection as an alternative method of compliance. If repairs are found installed, then the required actions per the AD para (2) are to be accomplished.

Point 2: Appendix 1/ Compliance Times:

The compliance times noted in Appendix 1 do not make any allowance for the age of the aircraft and when the SRM affected repair could have been applied. As an example, an aircraft with two or three years from first flight that has an affected repair has the same compliance time as one that has been flying for 12 years. In effect an aircraft that could only have an affected repair embodied for three years maximum has the same requirement as one that has been embodied for 12 years maximum. As the issue is fatigue related, we propose that some consideration be provided that allows a staggered compliance based on the first flight of the aircraft.

EASA response:

Point 1: Comment understood, but not agreed. EASA and Airbus took the approach based on hypothesis that the check of the records is sufficient to fulfil the airworthiness requirements. No other method of compliance was envisaged like visual inspection. However, the commenter could contact the State of Registry National Aviation Authority to apply for an AMOC approval.

Point 2: Comment understood, but not agreed. The issue covered by this AD is a fleet wide issue and it was not possible to provide such level of customization, which is why the worst case was considered. Nevertheless, the commenter could contact the State of Registry National Aviation Authority to apply for a (temporary) exemption to delay corrective action. Such action is, however, not encouraged by EASA.

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