

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 15-077 [Published on 03 June 2015 and officially closed for comments on 01 July 2015]

Commenter 1: SAS – Scandinavian Airlines – Mats Backlund – 01/07/2015

Comment # 1

Para (1) specifies to identify each forward engine mount thrust link clevis assembly by serial number and determine its flight cycles ... in accordance with ... SB 71-4008.

We anticipate a problem with this step as the SN can be difficult and even impossible to locate and record. This is based upon previous experience and that we have looked at some Clevis parts to find out where the SN is located and if they are readable. What will we do when we cannot find/read the SN? Do we will have to remove and scrap those Clevis parts for which we cannot find/read the SN?

We have been in contact with Airbus about this question and received an answer that we in this case shall refer to the Monte Carlo Counting Method (according to SB 71-4008) to establish the ageing of the part. We have no objection with that for the flight cycles estimate. But the PAD para (1) clearly states “identify ... by SN and determine ... FC”.

So we have to both determine the SN and determine the FC (with accurate or calculated data) to comply with para (1).

EASA response:

Comment understood. In EASA opinion, a forward engine mount thrust link clevis assembly whose serial number (SN) cannot be identified is a part with an unknown history. In accordance with paragraph (1) of the RACT section of the AD, an estimated figure can be evaluated by using the methodology described in Airbus SB A340-71-4008 (i.e. the Monte Carlo Counting Method).

EASA suggest, in this case, to assign a company SN to such a part to ease traceability.

A clarification has been added in the Final AD in response to this comment.