


EASA	COMMENT RESPONSE DOCUMENT
	<p align="center">EASA PAD No. 15-100</p> <p align="center">[Published on 27 July 2015 and officially closed for comments on 24 August 2015]</p>

Commenter 1: Hifly Aero – Rui Cavaco – 28/07/2015

Comment # 1

All three SB on their original issues (28-3127, 28-4138, 28-5060) could have applicability and/or configuration issues which, depending on the airplane type, may prevent adequate adherence to the inspection/replacement requirements. Are you delaying final AD issuance until content anomalies are solved?

As an example, SB 28-4138 accomplishment instructions require inspection/replacement of 8 non-existing positions (total of 10 installed), whereas the Inspection Report of subject SB correctly identifies all 10 positions. This was already confirmed to us by AIRBUS.

EASA response:

The configuration and applicability anomalies within the Airbus SB have been identified and a revision is underway to correct this.

Commenter 2: Lufthansa Technik – Karsten Hinkel – 10/08/2015

Comment # 2

LHT sends this comment on PAD 15-100 on behalf of DLH (61 affected A/C) and 7 other customers (total of 19 affected A/C):

1. “Appendix 1 – Fuel Pump Replacement” of the PAD has “Installed fuel pump configuration” as headline for the first column. This may lead to the understanding that a mix of affected and not affected units would end up in a not defined compliance time or to end up in a shorter compliance time than intended. For example if an A340-600 aircraft got 15ea pumps of PN: 568-1-28300-100 and one pump of PN: 568-1-28300-102 installed.

LHT recommends to change the headline to “Installed affected fuel pump configuration”, to prevent misunderstandings.

2. The indirect modification requirement, that has to be done either in accordance with SBC: 8810-28-05 or SBC:8810-28-03 is considered as possible for line maintenance action. Therefore LHT request to change the note of the accomplishment instructions

Equipment BFEB01				
ITEM	NEW PART N°	QTY (UM)	KEYWORD	SEE NOTES
	568-1-28300-103	6	PUMP	

NOTE:

BFEB01 is applicable to operators that take the option to replace Type 8810 Mk 100 Fuel Pumps P/N 568-1-28300-100 or Mk 101 Fuel Pumps P/N 568-1-28300-101; or return the Mk 101 Fuel Pump P/N 568-1-28300-101 to Eaton for modification.

Equipment BFEB02				
ITEM	NEW PART N°	QTY (UM)	KEYWORD	SEE NOTES
	568-1-28300-102	6	PUMP	

of the respective Airbus SBs: A330-28-3109, A330-28-3119, A340-28-4124, A340-28-4134 and A340-28-5053 as follows:

XXXXXX is applicable to operators that take the option to replace Type 8810 Mk X0X Fuel Pumps P/N 568-1-28300-X0X Fuel Pumps P/N 568-1-28300-X0X, return the Mk X0X Fuel Pump P/N 568-1-28300-X0X to an approved workshop, or to apply SBC 8810-28-0X on Mk X0X Fuel Pumps P/N 568-1-28300X0X.

Or to add a second option (upgrade by replacement of electrical connector) in the SBs. This would allow to do the modification directly on a closed loop and to avoid a very difficult spare situation. Our customers have hundreds of affected pumps, that need to be modified and the modification and the final test procedures are applicable for line maintenance action. Such a modification possibility is not unique and is often used (see A330-27-3205 for an example). LHT does not have a technical objection to do the SBC manner on pumps, that are not in the workshop.

The request for the second option will be additionally sent to Airbus via Tech Request.

EASA response:

- 1. EASA agreed with LHT comment and changed the affected title to indicate 'Installed Affected Fuel Pump Configuration'**
- 2. EASA agrees. The revision of the Airbus SB currently underway takes this point into consideration by giving the operator the option to return the fuel pumps to the vendor or modify them at their own repair facilities. Both the VSB 8810-28-03 and 8810-28-05 are referenced within the EATON CMM and therefore operators that have the appropriate maintenance facilities may perform fuel pump repair or modification, along with the appropriate functional tests before returning fuel pumps to service.**

Commenter 3: Eaton Aerospace – Nigel Bradshaw – 20/08/2015

Comment # 3

Eaton has reviewed the Proposal of Airworthiness Directive No 15-100 and would like to submit the following comments.

It is Eaton's objective to provide safe solutions to its customers to ensure flight safety. Eaton believes that applications of the existing service bulletins provide a satisfactory solution to reach that objective and ensure optimum flight safety.

In any event, Eaton believes that based on current information received and testing carried out in our labs, the statements made in the "Reason" section of PAD 15-100 and which relates to a possible ignition in the fuel vapour space and a possible fire or fuel tank explosion do not reflect the current technical assessments.

Should EASA decide to issue such Airworthiness Directive, Eaton respectfully requests that changes be made to PAD 15-100 (and the respective AD) as follows:

Reason:

Operators reported during maintenance cases of fuel leak through fuel pump electrical connectors. Subsequent investigation also revealed that the cause of fuel leak was due to fuel pump electrical connector damage caused by moisture build up behind the electrical connector. ~~which was generated by ice formation in the cavity behind the connector.~~

This condition, if not detected and corrected, could create an ignition source in the fuel vapour space within the fuel pump in the wing, possibly resulting in a fire or fuel tank explosion and consequent loss of the aeroplane a combination of risks resulting from a single failure, which is an SFAR88 unsafe condition.

To address this unsafe condition, Airbus published Service Bulletins (SB) A330-28-3127, SB A340-28-4138 and SB A340-28-5060, providing inspection / identification instructions, and instructions for replacement of the fuel pumps.

For the reasons described above, this AD requires identification and replacement of the affected fuel pumps.

Should EASA and its representatives disagree with Eaton's position, Eaton would request the opportunity to have a discussion with EASA, if possible via a meeting in-person, to understand EASA's position.

EASA response:

EASA agrees: the wording of the description of precipitating event and unsafe condition were adjusted accordingly.