



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-040

[Published on 15 March 2016 and officially closed for comments on 12 April 2016]

Commenter 1: Air Canada – Robert Giolti – 18/03/2016

Comment # 1

In response to paragraph (7), Installation of Parts, the following is stated: “From the effective date of this AD, it is allowed to install on any aeroplane pre-mod 204615 parts, provided that, following installation, the pre-mod 204615 parts on that aeroplane are inspected as required by this AD.” The terminology used is misleading and does not reflect how inlet cowls are managed off-wing and tracked with respect to AD compliance threshold and interval.

With the statement “it is allowed to install on any aeroplane pre-mod 204615 parts, provided that, following installation, the pre-mod 204615 parts on that aeroplane are inspected as required by this AD.”, this would indicate that regardless of the last inspection, time remaining or if accomplished in a shop, the AD inspection is required after installation.

As you are aware, this AD requires specialized tooling (5-m boroscope) and trained personnel, and I don’t agree with having to re-perform an inspection following installation if it is being tracked with AD compliance. In an operational environment, where a damage can occur due to maintenance or ground handling, if we would have to swap an inlet cowl due to damage, then we would be forced to inspect the replacement serviceable cowl following installation on that aeroplane. This is not the intent of the AD, and not an installation issue.

Therefore, I can suggest paragraph (7) be re-phrased as: “From the effective date of AD 2016-xxx, in case of inlet cowl replacement, it is allowed to install an inlet cowl on an aeroplane pre-mod 204615 parts, provided that, prior to installation, it is determined that the inlet cowl (pre-mod 204615) is compliant with the requirements of paragraphs (1), and (2) of this AD.”

For your review, please consider our comments to clarify the requirements of Para. (7) of EASA PAD 16-040.

EASA response:

Comment partially agreed. The commenter possibly misunderstands the wording ‘following installation’ to mean that an inspection is required immediately following installation. This is not the case, since ‘following installation’ is NOT a clear compliance time. Instead, the AD states ‘as required by this AD’ to make clear that the AD already contains the compliance time (depending on FC accumulated) for the first inspection (Table 1) and includes reference to the Airbus SB for the repetitive inspection intervals. Any previous inspection of a part is given ‘credit’ by the standard statement in the AD that the actions are ‘required as indicated, unless accomplished previously’.

Nevertheless, EASA understands the potential for misinterpretation, therefore Table 1 and paragraph (7) of the Final AD have been amended to improve clarity and increase flexibility.



Commenter 2: Cathay Pacific – Edie Abdul Kadir – 21/03/2016**Comment # 2**

(A) PAD 16-040 Para (2)

Conditional Credit for Previous Action(s): Inspections and corrective actions on an aeroplane, accomplished before the effective date of this AD in accordance with the instructions of Airbus SB A330-71-3025 original issue or Revision 01, are acceptable to comply with the initial requirements of paragraph (1) of this AD for that aeroplane, provided that, within 1 050 FC after the effective date of this AD, a one-time inspection of attachment rivets of the IBA and OBA of the forward bulkhead is accomplished in accordance with the instructions of Airbus SB A330-71-3033.

CPA comment: The threshold between PAD and Airbus SB is different. The Airbus SB threshold is 1500 FC but PAD states 1050 FC. Please change the AD compliance threshold for this para. to 1500 FC to align with the Airbus SB.

(B) PAD 16-040 Para (6)

Optional Terminating Action: Modification of an aeroplane in accordance with the instructions of Airbus SB A330-71-3032 (introducing improved air intake primary structure and new piccolo tube supporting structure for each engine) constitutes terminating action for the repetitive inspections required by paragraph (1) of this AD for that aeroplane.

CPA comment: Airbus SB A330-71-3032 refers to VSB ROLLS-ROYCE Service Bulletin No. RB.211-71-H847. The Airbus SB work instructions is mainly for aircraft preparation (removal and installation of the component), but the actual mod is given by Rolls-Royce SB.

Some of CPA components have accomplished the mod in the workshop directly using VSB ROLLS-ROYCE Service Bulletin No. RB.211-71-H847. However the PAD does not make any reference to Rolls-Royce SB. We would like to ask EASA to include ROLLS-ROYCE Service Bulletin No. RB.211-71-H847 reference in the AD so that we can take credit for the mod done.

EASA response:

Point (A): Comment not agreed. The compliance time of 1 500 FC was calculated and valid when Airbus SB A330-71-3033 was published. Few months have passed and the 1 050 FC is an adjusted value considering the situation.

Point (B): Comment partially agreed. The optional modification is at aircraft level (this is an aircraft AD, not a ‘component’ AD) and the purpose is to replace certain engine air intake nose cowl assemblies (which are part of the aircraft type design) with parts that have been modified (in-shop, through the RR SB). It should be clear that the instructions of the RR SB cannot be used to modify an aircraft, as specified in paragraph (6) of the AD.

EASA agrees that reference to the RR SB is useful and a Note has been inserted into the Final AD accordingly.



Commenter 3: Cathay Pacific – Edie Abdul Kadir – 23/03/2016**Comment # 3**

The applicability of the repeat inspection requirement is based on whether the component is pre/post mod of MOD 204615 and SB A330-71-3032.

For the optional terminating modification per VSB ROLLS-ROYCE Service Bulletin No. RB.211-71-H847, the part number of the Inlet Cowl will be changed to SJ30820 or SJ30821 after the mod is accomplished. Therefore we think it is better to determine the applicability of the AD based on the part number instead of MOD number or SB status. Note that the component frequently be transferred across the aircraft and it is difficult to determine when was the Airbus SB was done and which component was installed during that time. In addition, it is possible for the terminating mod will be done in the workshop for the spare Inlet Cowl by MRO or the vendor i.a.w. Vendor SB. Airbus SB is applicable on-wing and will not be applied on the component modification in the shop..

Therefore, since there is part number difference for pre and post terminating mod, CPA is requesting EASA to identify the applicability of the AD based on the component part number list.

EASA response:

Comment partially agreed. The Applicability of the AD remains unchanged, as the affected cowls and engines can easily move from one aircraft (e.g. pre-mod) to another (post-mod) aircraft. The AD takes this possibility into account through paragraph (7). The ‘terminating action’ can therefore only be done at aircraft level – this is an aircraft AD, not a ‘component’ AD. However, EASA agrees that a reference to actions done through the RR SB is appropriate. See EASA answer to Comment #2. In addition, the heading of paragraph (1), as well as paragraph (7) of the Final AD, are amended to identify the ‘to-be-inspected’ pre-mod P/Ns.

