



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-088R1

[Published on 17 August 2016 and officially closed for comments on 31 August 2016]

Commenter 1: Lufthansa Technik – Peter Brudler – 01/09/2016

Comment # 1

A. Comment on Required Action(s) and Compliance Time(s), paragraph (1): Please add a Note:

"NOTE 3: If the engine is removed from service but not inducted into engine shop for a formal engine shop visit (as defined in RR Engine Management Programme Section 8.3.4) apply the on-wing limits for inspection and repair of the engine."

refer e.g. to EASA AD 2012-0209:

"Definition: For the purpose of this AD, a qualifying engine shop visit is a visit which involves the removal of at least one of the engine major modules: fan, core engine, or low pressure turbine."

For information: RR definition of shop visit is iaw Document RM1853, issue 25 (Generic EMP): "8.3.4 Engine Shop Visit - An engine removal is classed as a 'Shop Visit' whenever the engine maintenance performed prior to reinstallation requires one of the following:

a) Separation of a pair of major mating engine module flanges. Note: A separation of flanges solely for the purpose of shipment, without subsequent internal maintenance is not a 'shop visit'. NB - The External Gearbox engine mating flanges are not classed as major flanges and removal of the External Gearbox is not classed as an Engine Shop Visit under the definition above.

b) Removal of a disc, hub, or spool."

B. Comment on Appendix 1 (Alternative NMSB and Section for Post-mod 72-J024 TBH – Mount Lug Forging LE and Cutback Areas):

The statement should be: In-shop: RB.211-72-AG971 Rev 2, Section 3.C, or RB.211-72-AJ101 Rev 0, Section 3.B. (see Note A2)

C. Comment on Appendix 2 (Alternative NMSB and Section for Post-mod 72-J024 TBH – Mount Lug Forging LE and Cutback Areas):

The statement should be: In-shop: RB.211-72-AG971 Rev 2, Section 3.C, or On-wing RB.211-72-AJ101 Rev 0, Section 3.A. (see Note A2)

EASA response:

A. Comment not agreed. The addition of the proposed NOTE in the AD is not deemed necessary. The "on-wing" and the "in-shop" requirements of the AD need to be accomplished within the specified compliance times. When applicable, inspections performed "on-wing" are acceptable



alternative to the inspections required “in-shop”, and vice-versa, as shown in Appendices 1 and 2 of the AD. No changes have been made to the Final AD in response to this comment.

B. Comment agreed. The Final AD has been amended accordingly.

C. Comment agreed. The Final AD has been amended accordingly.

