



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-148

[Published on 18 October 2016 and officially closed for comments on 15 November 2016]

Commenter 1: Airgreen– Claudio Pioli – 19/10/2016

Comment # 1

Yesterday we received the PAD in subject concerning the Safran Helicopter Engines (former Turbomeca) ARRIEL 2E front supports replacement.

We observed that at the voice "**Modification**", bullet (1), the replacement is required before the affected MO1 (pre TU197) exceeds 1600 operating hours since new, whereas the Manufacturer reports on the MSB 292 72 2197 the same limit but allowing a tolerance of (plus) 80 hours.

Owing to the fact that the "**Note 1**" of the same PAD paragraph states as serviceable limit for a not modified (pre TU197) module the value of 1680 operating hours, we should suppose that the 80 hours tolerance provided by the manufacturer has been considered and accepted by EASA, but, due to an unknown reason, it has, on the PAD, not been associated with the above recalled 1600 operating hours limit.

Please, if we are right, take note of our observation before issuing the AD.

EASA response:

Comment understood but not agreed. The 80 EH tolerance is a grace period for an engine that has exceeded or is close to exceed the 1 600 EH. For an engine that is far away from 1 600 EH, the modification of that engine must be accomplished before it exceeds 1 600 EH.

No changes have been made to the Final AD in response to these comments.

