



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-160

[Published on 11 November 2016 and officially closed for comments on 09 December 2016]

Commenter 1: Cathay Pacific Airways – Anthony Shum – 04/12/2016

Comment # 1

I [request] further clarifications on Paragraph (3) of the Part(s) Installation, [which states] that [From the effective date of this AD, it is allowed to install an affected intermediate module \(see Note 3 of this AD\) on an engine, provided that, prior to installation, the CIC has passed an FPI in accordance with the instructions of the NMSB.](#)

A. Here is the query: During engine shop visit it may fall into a scenario that the engine does not undergo a Refurbishment shop visit but only a Check and Repair shop visit, where the Intermediate module has been removed for a LV1 “serviceability” or LV2 “Check and Repair” shop visit, so does it mean that the subject intermediate module before it can be installed onto the engine has to be FPI inspected according to RR NMSB 72-AH976 even the engine shop visit is not classified as an engine refurbishment?

If the above is that case, then whether this paragraph (3) could be amended to only limited to those intermediate case to be installed on to the engines which is currently undergoing refurbishment shop visit?

B. Another issue would like EASA to kindly clarify is the Ref. Publications section, the RR Alert NMSB RB.211-72-AH976 date should be 3 Nov 2016 for initial issue instead of 28 Oct 2016 as stated in the PAD.

EASA response:

A. NMSB 72-AH976 states that it must be accomplished at next engine refurbishment, which is normally done at a 6,000 cycle interval. However, if an operator or shop elects to do it earlier than 6,000 cycles, that is acceptable for compliance with the AD.

Note that the word ‘install’ as used in § (4) [previously §(3) in the PAD] does not mean that, when a module is re-installed on the same engine after removal (for whatever reason), the AD requires the CIC to pass an inspection before re-installation. Unless such action is done during a qualified shop visit, in which case § (1) of the AD prevails. Paragraph (4) addresses modules that are not installed on any engine, i.e. currently held as spare. The purpose of this paragraph is to prevent introducing the unsafe condition on an engine that is currently not subject to inspection (no affected module installed). No changes have been made to the Final AD in response to this comment.

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



Commenter 2: Lufthansa Technik – Alexander Böckling – 08/12/2016**Comment # 2**

- A. SB 72-AH976 was revised to Issue 2. Please allow usage of current version of SB or newer.
- B. SB 72-AH976 refers to Subtask 70-00-00-230-210-002 which is incorporated in Task 70-00-00-200-210 for the FPI inspection. This inspection is also performed with inspection task Engine Manual 72-33-10-200-801. (Task 72-33-10-200-801 refers to Task 70-00-00-200-213 for the FPI inspection, which is now incorporated in Task 70-00-00-200-210.) Please allow accomplishment of inspection according EM 72-33-10-200-801 as an acceptable means of compliance for the AD, since it would lead to the same inspection Task as required by SB 72-AH976.

EASA response:

- A. Comment agreed. The Final AD is amended to require Revision 1 of the NMSB is included, while credit is provided for previous actions by using the original NMSB.**
- B. Comment not agreed. Since EM TASK 72-33-10-200-801 leads to accomplishment of SUBTASK 70-00-00-230-210-002, it results in using the same method of compliance as specified in the NMSB. As this would make no difference (not a true alternative), there is no need to include this reference into the AD. No changes have been made to the Final AD in response to this comment.**

