



COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-036

[Published on 21 March 2017 and officially closed for comments on 18 April 2017]

Commenter 1: Germanwings GmbH – Sascha Then – 24/03/2017

Comment # 1

On behalf of Germanwings GmbH, I would like to comment the PAD 17-036 with the intention to obtain an AMOC to continue the repetitive inspection of aft engine mount inner retainers acc. RA32071-160 in lieu of replacing the aft inner retainers acc. SB 32071-164.

Background:

We performed approx. 150 Inspections acc. RA32071-160 without findings until now.

The costs for a replacement of the mount retainers are significantly higher compared to a re- inspection with an interval of 12 month.

To illustrate and highlight this fact:

The replacement of the retainers of the whole fleet means direct costs of ~ EUR 175.000,00 / USD 190.000,00 compared to the re- inspection ~ EUR 9.000,00 / USD 10.000,00 every 12 Month.

We expect to see the possibility of the re- inspection in an AMOC or implemented in the EASA- AD itself. Please consider any option.

EASA response:

Comment not agreed. The modification of the retention system must be implemented to ensure the double retention feature, as required by certification requirements, to avoid a failure of the part potentially leading to the loss of the complete locking features. The repetitive inspection, as noted in EASA AD 2016-0010, must be considered as an interim measure.

No changes have been made to the Final AD in response to this comment.

Commenter 2: Air Canada – Daniel McKinley – 27/03/2017

Comment # 2

Air Canada would like to offer the following comments for consideration with respect to the terminating action for this PAD:



ACA would like to request that terminating action (ie. new mount retainers installed), be carried out at next engine shop visit, or next engine mount removal, instead of the proposed compliance of “within 48 months”. The repetitive detailed inspection would remain in effect until the new mount retainers are installed.

ACA’s experience with the repetitive detailed inspection has revealed an extremely low failure rate, in the ACA operation.

This change in compliance would reduce the risk of schedule interruption to the airline, because mounts would not need to be modified in the Line Maintenance environment. It would remove the requirement to modify aircraft that may be retiring shortly (or shortly after the 48 months). Based on ACA experience, it would provide equivalent safety and meet the intent of the proposed AD, while allowing some flexibility to the airlines to comply at the best opportunity.

EASA response:

Comment not agreed. Available data does not support longer compliance time. See also EASA answer to Comment #1.

No changes have been made to the Final AD in response to this comment.

Commenter 3: AirAsia Berhad – Shane Low – 06/04/2017

Comment # 3

From the recent PAD 17-036 we understand that an AD will be issued for the introduction of post-mod aft engine mount retainers for A320s fitted with CFM56-5B engines. We have been aware of this modification since Airbus SB 71-1071 and UTAS SB RA32071-164 were published. We have intended to comply with the SB even prior to this PAD notice, as the Airbus SB is mandatory.

However, upon reviewing SB RA32071-164 we realised the marking requirements in the accomplishment instructions are very difficult to perform on wing. In this SB we are required to re-identify the aft mount beam assembly via electrochemical etching, a technique more accustomed to bench repair in shop than on wing marking at line. As of now neither we nor our MRO partners have electrochemical etching capabilities. We are extremely reluctant to remove the aft engine mounts for this modification to be performed in shop, as aft engine mount removal imposes huge manpower costs because the engine needs to be dropped. This is worsened by the fact that we have 167 aircraft affected by this.

We have since raised our concerns with Airbus, in their response they have stated that there will be a revision to SB RA32071-164 which will affect the on wing part number marking requirements. The SB revision was due at the end of February 2017, but we have not received a revision until now. With this in mind, we would like to request EASA to delay the AD publication until the SB revision is issued. This will give us ample time to arrange for the best way forward to implement this modification once the revision is out.

EASA response:

Comment noted: as a general note, it must be noted that SB revision issued after the AD are accepted for compliance, as stated in the Ref. Publication section of the AD. Since UTAS SB revision has been issued, it has been included in the Final AD reference publication section.



Commenter 4: Lufthansa AG / DLH – Sebastian Greim – 26/04/2017**Comment # 4**

On behalf of Lufthansa AG/DLH, I would like to comment on the PAD 17-036 with the intention to obtain an AMOC or to introduce our request as part of the planned EASA AD to continue the repetitive inspection of aft engine mount inner retainers acc. RA32071-160 in lieu of replacing the aft inner retainers acc. SB 32071-164.

Background:

Our finding rate on the current design of the engine mount retainer is 0,7% .

The costs for a replacement of the mount retainers are significantly higher compared to a re- inspection with an interval of 12 month. Furthermore, considering the fact that the (repetitive) inspections have been sufficient to ensure a safe operation during the past 4 years (since issuance of AD2013-0050), we would like to understand why now a replacement is necessary. The PAD does not provide a substantiation for that.

Due to the significant higher costs by implementing the current design (POST SB 32071-164) to the fleet within the time range, we request the possibility to implement this design as scrap replacement during repetitive inspection, or as scrap replacement during overhaul without a static time range of implementing.

EASA response:

Comment not agreed. See EASA answer to Comments #1 and #2.

No changes have been made to the Final AD in response to this comment.

