



COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-047

[Published on 12 April 2017 and officially closed for comments on 26 April 2017]

Commenter 1: Lufthansa Technik – Alexander Böckling – 24/04/2017

Comment # 1

- A. Para 6: The term “affected engine” is not defined. The applicability of the PAD is defined as all engines, that are listed in Appendix 1 of SB 72-AJ738. Are affected engines equal to applicable engines?
- B. The PAD does not allow to set back the on-wing inspection interval timer after an engine with affected locking plates was inspected in shop according SB 72-AJ738 Section 3.B. We are on the opinion that the in shop and on-wing inspection are equivalent. Therefore a note should be added, that an in-shop inspection accomplished i.a.w Para 2 of this AD is acceptable in lieu of an on-wing inspection as required by of para 1 of this AD. Please note, that this should also be reflected in Para 6.2, by allowing inspection according to 3.A or 3.B as qualification for installation.
- C. Para 3 and Para 4: We currently don’t understand why we should contact Rolls-Royce as a requirement of the AD, if we have findings on wing. SB 72-AJ738 includes clear instructions on acceptance criteria. Does EASA plan / anticipate any extended fly-on options, currently not included in the SB and will be provided later on by RR, example via a Technical Variance for engines rejected on-wing?
- D. Para 5 of the PAD shows no terminating action. We are aware that currently there are no modifications (SB) which officially terminates this condition. However, if no affected locking plates are found (Para 6.1) or, if the engine is fully equipped with locking plates that are not affected during a shop visit, this should qualify as a terminating action for the on-wing inspection until next shop visit. Could you please clarify?
- E. Our communication with RR shows, that instructions on partially missing locking plates will not be included in the SB and partially missing plates are not expected to occur. Does EASA also share this view or should the PAD include information and instructions on what to do if partially missing plates are found, e.g. if a partly missing locking plate should be counted as a totally missing locking plate or accepted as a bigger crack but not missing plate.

EASA response:

- A. Comment agreed. The word ‘affected’ has been removed from §(6) in the Final AD.**
- B. Comment agreed, even though it should be noted that the AD does not require repetitive in-shop inspections. A note has been added to the Final AD accordingly.**



- C. Comment not agreed. The AD specifies clearly in which case (one or more affected locking plates missing) the engine must be removed from service and RR contacted for corrective action instructions. For any other findings, the AD does not include any requirements. No changes have been made to the Final AD in response to this comment.**
- D. Comment not agreed. A terminating action (expected to be a modification, involving replacement of all 'affected' locking plates with new P/N plates) is under development, but not yet available. Clearly, for an engine that does not have 'affected' locking plates installed, no inspections are required. However, since affected locking plates can still be installed (see §(6) of the AD) on an engine that does not have any of those plates installed, EASA decided not to define (e.g.) 'installation of not-affected locking plates' as terminating action. If that were the case, that provision would also have to include a requirement, after such 'modification' of an engine, to prohibit installation of 'affected' locking plates, thereby contradicting the allowance of paragraph (6). No changes have been made to the Final AD in response to this comment.**
- E. EASA concurs with the quoted RR position. It may be expected that, in the event of finding a 'partially missing' locking plate, the operator would notify RR. If and when such an occurrence is reported would EASA consider an alternative requirement. No changes have been made to the Final AD in response to this comment.**

Commenter 2: Air France (on behalf of Air Caraïbes) – Loic Bourdais – 25/04/2017

Comment # 2

Paragraph (5) / Terminating action: None.

In case a shop has replaced in an engine all affected IPT stage 2 locking plates by brand new not affected parts as per AD Note 2 definition then, engine is released with this AD stated as Not Applicable.

In this case, paragraph (6.1) of the AD applies at next engine installation:

"Before installation, it has been determined that no affected locking plates (see Note 2 of this AD) are installed on the engine."

Therefore, can the replacement in shop of all affected parts by Not Concerned IPT stage 2 locking plates be considered as a terminating action to this On Wing repetitive AD?

EASA response:

Comment not agreed. See EASA answer to Comment #1, point D. No changes have been made to the Final AD in response to this comment.

