



COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-073R1

[Published on 22 August 2017 and officially closed for comments on 05 September 2017]

Commenter 1: British Airways – Andrea Carrara – 24/08/2017

Comment # 1

1. Typographical error: Note 2 Page 2, “effected” should be corrected to “affected”.
2. Note 2 specifies that the AD is applicable to part number L7121076120000. This part number does not feature in the Airbus IPC and as such are not tracked items by ourselves and possibly other airlines. This part number would feature in the rear mount CMM, however CMMs are only used for off-wing purposes. It is the aircraft IPC which is used for on-wing purposes. As the AD requires on-wing action, I don’t believe it is correct to quote a part number which is not in the aircraft IPC.

I appreciate there is a cross-reference on Page 4, however that needs to be reviewed as per below.

3. Pages 4 and 6, part number L7121016500000 is mentioned twice (“...rear engine mount assembly P/N L7121016500000, L7121016200000 or L7121016500000...”). This would appear to be a mistake and perhaps should be L7121016002000 or L7121010700000? Or perhaps neither.

EASA response:

1. **We agree: The Final AD will be amended accordingly.**
2. **We agree: The Note 2 of the Final AD will be modified to list the P/N of rear engine mount assemblies P/N L7121016002000, L7121016200000 and L7121016500000, on which the rear engine mount beam P/N L7121076120000 can be installed.**
3. **We agree: The Part Numbers of the rear engine mount assemblies will be corrected in the Final AD.**

Commenter 2: Qantas Airways Limited – Simon Beevers – 31/08/2017

Comment # 2

1. Appendix lists p/n L7121016500000 twice.



2. We request specific confirmation that previous HFEC inspection of the mount fully satisfies the intent of this AD.

EASA response:

1. **We agree: The Final AD will be amended accordingly.**
2. **We agree: The Final AD will be amended accordingly.**

Commenter 3: Lufthansa Technik AG – Peter Brudler – 06/09/2017

Comment # 3

1. The answers you provided in CRD and actions shown in the PAD are misleading regarding requirements (1) and (2) and answer on LHT comment #2: if the whole inspection iaw 54-51-08 has to be accomplished, (1) and (2) must be phrased differently (changes in bold):

“(1) Within 1 000 flight cycle (FC) accumulated by the affected rear engine mount beam after the effective date of this AD, accomplish a detailed inspection (DET) or HFEC inspection of the affected rear engine mount assembly (see Note 2 of this AD) of each engine in accordance with the instructions of the SB.

(2) If, during the DET inspection as required by paragraph (1) of this AD, it is determined that the fail-safe load path is not activated, within 3 800 FC after the effective date of this AD, accomplish an HFEC inspection of the affected rear engine mount assembly in accordance with the instructions of the SB.”

2. Note 2 and Appendix: please realign AD if Appendix is “Appendix” or “Appendix 1”.

3. EASA commented (comment 1 to LHT and QFA) what part of the rear mount assembly (it is P/N L71210761200, which is not shown in any IPC) was affected by the AD. But there is no statement in the AD which physical part is meant. Please add the statement of the CRD document or add a similar P/N that can be found in Airbus documentation, like L7121075000000.

4. Appendix and figure 2: one P/N is shown twice. Please correct one of them to : L7121016500040. Please note that there are also assemblies of P/N L7121016002000 and L7121016002040 shown in the CMM IPL. Are they also affected?

5. Please add a general note in the AD, that the number of zeros at the end of the P/N can vary but that it has no influence on AD/SB applicability.

6. Appendix (table of not affected parts): please add in column one below “Rear engine mount beam S/N”: “Note 3: In some cases S/N can be amended by a prefix added by Airbus”.

7. Just a note: A list of affected parts wouldn’t be misleading or misunderstood. It is the other way around. A list of affected parts would help the airlines identifying which parts are affected and the physical parts can be directly crosschecked with the list to check if they were affected. For the



affected parts also the bridging 'part S/N' to 'assembly S/N' was done by the TC Holder for this "positive list". The airlines have no documentation to do this bridging and need to check every part during SB accomplishment for SB/AD applicability and required corrective actions.

8. Please check again if a credit can be given to all operators that accomplished inspection iaw NTM section 54-51-08 previously (same opinion of Qantas as shown in CRD). It is understood that there was a change in MPD requirements from visual inspection to eddy current inspection, but technically all inspections already done iaw NTM 54-51-08 fulfill the AD requirements. Therefore this credit should be given to the operator. As this is also ALI inspection, operators have a clear visibility when inspection was performed and can show therefore compliance to the AD even in regard of a possible credit. It could be possible that from ALI introduction and on all inspections should be given as the mentioned credit.

EASA response:

1. We agree: The Final AD will be amended accordingly.

2. We agree: The Final AD will be amended accordingly.

3. Note 2 of the Final AD will be modified to list the P/N of rear engine mount assemblies P/N L7121016002000, L7121016200000 and L7121016500000 on which the rear engine mount beam P/N L7121076120000 can be installed.

4. We agree: The Final AD will be amended accordingly.

5. We agree: The Final AD will be amended accordingly.

6. We agree: The Note 3 will be added under Table 1 of Appendix of the Final AD specifying that the rear engine mount beam s/n can be amended by a prefix.

7. Comment noted. The list of parts inspected in production using HFEC inspection is known to Airbus, therefore Airbus can provide this list. No changes will be made to the Final AD in response to this comment.

8. The comment was assessed and it was confirmed that a HFEC inspection, accomplished before the effective date of the Final AD, in accordance with A380 Nondestructive Testing Manual task 54-51-08 provides equivalent level of safety to HFEC inspection required by the AD. The Final AD will be amended accordingly.

