



COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-073

[Published on 13 June 2017 and officially closed for comments on 11 July 2017]

Commenter 1: Lufthansa Technik AG – Peter Brudler – 26/06/2017

Comment # 1

For all A380 aircraft powered by RR Trent 900 engines a one off Airbus Detailed and Special Detailed Inspection (DET and SDI) SB has been released on rear engine mount beams with Part Number (PN) L7121076120000 and/or a detailed inspection of fail-safe pin (axis) for detecting possible surface crack indications and to remove and replace the affected parts on all affected rear engine mounts.

Following the release of above mentioned SB the following question / concerns arose and LHT is asking Airbus to answer the related question in detail:

1. The given P/N in the AI SB is currently neither available in A/C IPC nor the CMM. The P/N can be found only in the SRM.

Please provide the IPC and CMM related P/N which is to be inspected (PN L7121076120000 which is referenced in SB A380 71-8013 cannot be found in Airbus documentation for tracking purposes).

2. The SDI (=NDT54-51-08) is to be done in 4 steps. Is every step subject of SB 71-8013 or only the rear mount beam? In case the rear mount beam is meant, it should be noted in the planned EAD that only the rear mount beam is subject for inspection (please refer to question 1).

3. As the SDI inspection has already been included into the DLH T900 MS, CMS Task CM7122-R9705-01 (ALI item 712200-R9005-01A) Threshold: 28000FH, 3800FC with Interval 28000FH, 3800FC) since EIS and has been performed at each Engine Change, a credit should be given to the operators, which would reduce the amount of inspections mandated. This should be reflected in the Airbus SB. (The SB states that all spares are affected which didn't receive the ALI item 712200-R9005-01A (HFEC inspection) => therefore where is the difference between spares already inspected and Rear Mount inspected a few days ago and already installed from a technical point of view ??).

Please add a note in the AD that only an inspection iaw NTM Task 54-51-08-250-801 for the rear engine mount beam is required and not for the three other listed parts in NTM section 54-51-08 that are required by ALI Task 712200-R9005-01A which is referenced as inspection procedure in Airbus SB A380 71-8013 (in case only the rear engine mount beam is affected – in case all parts being part of the NTM 54-51-08 are to be inspected).



4. As the DET inspection (before 1000FC) after EAD effective date, this inspection is treated only as an "Interim" inspection whereas the SDI is treated as "final compliance". From LHT Point of view the SDI should terminate the DET requirement in case the SDI is done at first. No information has been provided in PAD or AI SB about this.
5. A statement in the AD is missing that only PN and SN are affected that are listed in Airbus SB A380-71-8013.
6. Airbus SB refers to P/N L7121076120000 and lists several SN that are not affected by SB and therefore by AD. On the part itself you find a prefix to the SN showing where the marking was applied by Airbus. Because it is not possible (for the person checking the serial number) to see that the prefix is not part of the serial number a note should be added in the AD stating that the serial number has a two digit prefix. Please see a picture below as an example.



7. (1) could be misleading in the interpretation of the airlines. As all rear engine mounts should be inspected and not all engines (due to spare mounts, etc.), please re-align statement (1) to: "Within 1 000 flight cycle (FC) after the effective date of this AD, accomplish a detailed inspection (DET) or HFEC inspection of each rear engine mount in accordance with the instructions of the SB."

Please review the comment of DLH / LHT for input into the planned EAD /revision of Airbus SB.



EASA response:

1. **Comment agreed. The P/N provided in the SB corresponds to the simple part of the rear engine mount without clevis, axis and bushes. In IPC and CMM, only the assembly number is provided. For P/N L71210761200 the corresponding assembly numbers are:**
L71210160020
L71210162000
L71210165000
Please note that the S/N provided is only linked to the P/N L71210761200, the PAD 17-073 is reviewed and updated to avoid any misunderstanding.
We have amended the revised PAD accordingly.
2. **Comment noted: The whole inspection described in NDT54-51-08 has to be done because as detailed in the flowchart of the SB p42, we ask first to perform the failsafe pin check and in case of no finding we allow the A/L to wait next current planned inspection (AMM Task 71-22-41-280-801 linked to MPD Task 712200-R9705 requested each 3800FC).**
No changes have been made to the revised PAD in response to this comment.
3. **Comment not agreed: The inspection linked to ALI 712200-R9005-01A was previously only a visual inspection of the Rear Engine Mount (for failed part). When the crack on rear engine mount has been found in service, this task has been modified to secure the fleet. Engine mount can be swapped from an A/C to another and this task is only requested each 3 800FC. For these reasons, some rear engine mounts have never been inspected and others 2 or 3 times but we do not have a clear visibility on this information. We ask first to perform the failsafe pin check and if no finding we allow the A/L to wait next scheduled inspection, for safety reasons we must request this inspection to the whole fleet. See also response to question 2.**
No changes have been made to the revised PAD in response to this comment.
4. **Comment noted: If the SDI inspection is performed first without finding, this action will be terminative regarding the mandated inspection requested by the SB. The failsafe pin check is firstly proposed in the SB to avoid burden to the A/L. The proposed AD in paragraph (1) requires accomplishment of a DET or SDI (HFEC). Paragraph (2) is required [HFEC inspection] if the operator choose DET during accomplishment of paragraph (1).**
No changes have been made to the Final AD in response to this comment.
5. **Comment noted: The inspected parts in production is easy to track that is why the list provided in the SB is only based on “not affected parts”. A list of not inspected parts could lead to several mistakes.**
We have amended the revised PAD accordingly.



6. Comment agreed. We have amended the revised PAD accordingly.

7. Comment agreed. We have amended the revised PAD accordingly.

Commenter 2: Qantas Airways Limited – Simon Beevers – 11/07/2017

Comment # 2

1. P/N L7121076120000 is not listed in the Qantas A380 AIPC.
2. The Qantas Rear engine mount serial numbers are all in the range SE10013 to SE10578. This serial number format is very different to that specified in the Airbus SB.
3. The SB is not applicable to mounts post SE465. Should this be written as SE00465, or even SE100465? Are the Qantas mounts SE10013-100578 considered after SE00465?
4. The MPD requires HFEC inspection every 3800FC, therefore the HFEC inspection instructed in the SB 3800FC after the DET inspection appears unnecessary as the MPD would naturally drive an inspection at 3800FC from new.
5. Qantas has been taking advantage of engine change opportunities to carry out HFEC inspection on an opportunity basis. Have other operators been doing the same. Because of this policy we only have 5 rear engine mounts that have not been through HFEC inspection (S/Ns SE10144, SE10288, SE10295, SE10576 and SE10578).

EASA response:

1. **Comment agreed. The P/N provided in the SB corresponds to the simple part of the rear engine mount without clevis, axis and bushes. In IPC and CMM, only the assembly number is provided. For P/N L71210761200 the corresponding assembly numbers are:
L71210160020**



L71210162000

L71210165000

Please note that the S/N provided is only linked to the P/N L71210761200, the PAD 17-073 is reviewed and updated to avoid any misunderstanding.

We have amended the revised PAD accordingly.

2. *Comment noted: The serial numbers with format SEXXXXX are provided for the rear mount assembly; in the SB we ask to check the serial number provided for the simple part L71210761200 in the front of the part, see Figure below for marking area. Basically the S/N number is usually provided in the same area, as the P/N L71210761200 see Figure 1.*
The serial number provided for the rear mount assembly is located on the side of the part, see Figure 2 below, and this serial number is linked to assembly number given in answer to question 1:
We have amended the revised PAD accordingly.
3. *Comment noted: Please check if your S/N is linked to the assembly number as described in question 2. Serial numbers SE10013-100578 are normally linked to the assembly number and not the simple part number.*
No changes have been made to the revised PAD in response to this comment.
4. *Comment noted: The SDI requested inspection will occurs at the same time than requested by MPD only in case no failsafe pin activation has been found during DET inspection. The DET inspection is firstly proposed to avoid burden to the A/L.*
No changes have been made to the revised PAD in response to this comment.
5. *Comment noted:*
No changes have been made to the revised PAD in response to this comment.



Figure 1

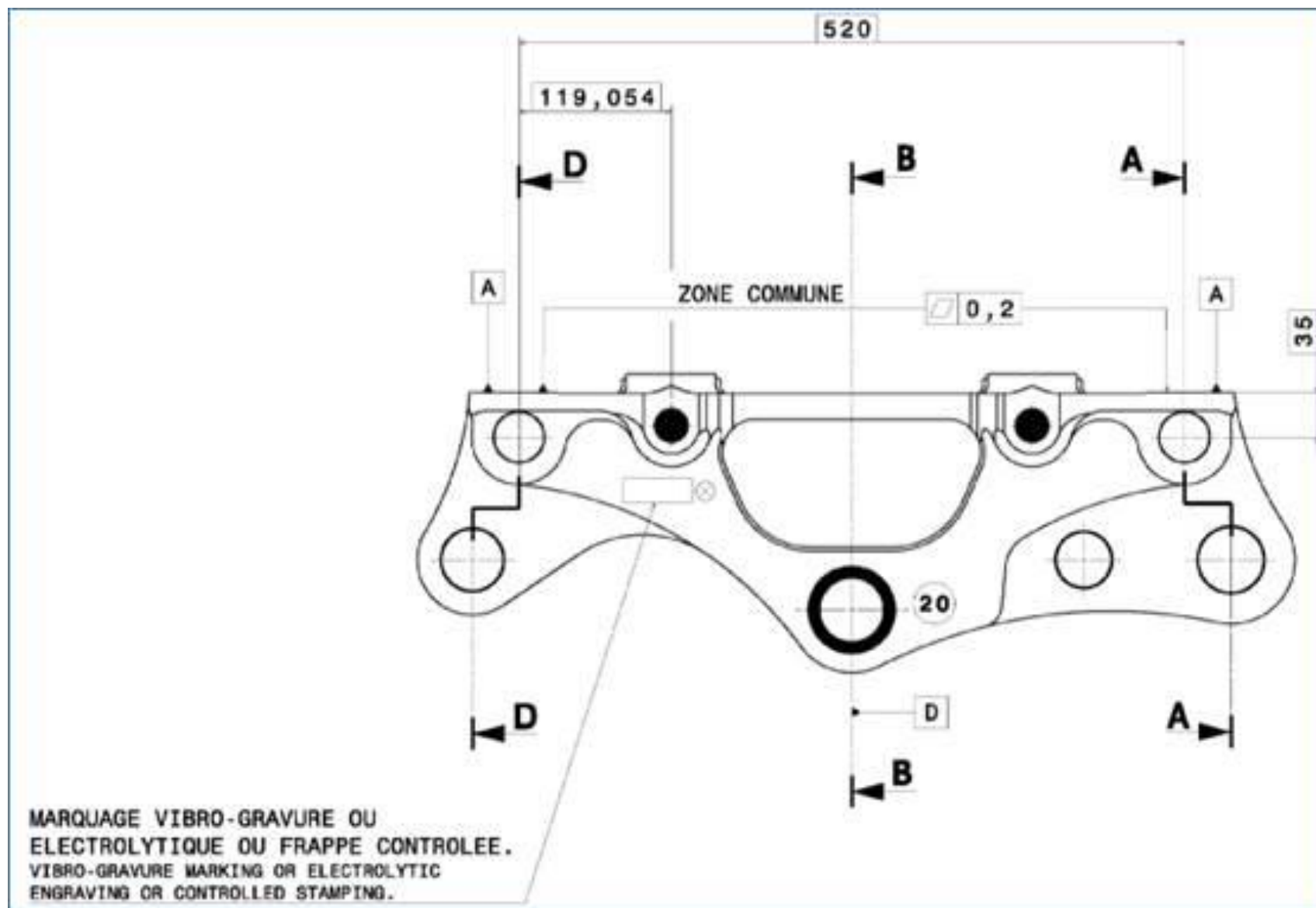


Figure 2

