



COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-084R1

[Published on 15 January 2018 and officially closed for comments on 12 February 2018]

Commenter 1: Aer Lingus – David Burke – 26/01/2018

Comment # 1

Concerning PAD 17-084R1, EIN wish to raise the below two queries:

A) Airbus SB A320-54-1027 Revision 02 and Revision 03 require additional work for aircraft modified per Revision 00 or Revision 01. EIN shall embody the additional work during next C Check, however, EIN would request if EASA mandate the additional work that sufficient Grace Period is given to allow operators reach next Heavy Maintenance Visit. (Threshold of 2500FC/ 3750FH since Airbus SB A320-54-1027 Revision 02 issuance date will result in unscheduled maintenance visits for EIN aircraft).

B) Identify Qty.2 typo error within the PAD.

- Paragraph 2: Airbus SB A320-54-1027 Revision 032 is stated, revision status should read Airbus SB A320-54-1027 Revision 03.
- Paragraph 4: Airbus SB A320-54-1027 Revision 032 is stated, revision status should read Airbus SB A320-54-1027 Revision 03.

EASA response:

1A) Comment not agreed. The additional work is required concurrently as part of first accomplishment of the inspections required by paragraph (2) of the AD. No changes have been made to the Final AD in response to this comment

1B) Comment agreed – The final AD has been corrected

Commenter 2: Vanilla-Air Inc – Fumiharu Iwashiro – 09/02/2018

Comment # 2

REFERENCE:



Ref/A/ EASA PAD No.: 17-084R1 (issued 15 JAN 2018)

Ref/B/ EASA AD 2014-0154

Ref/C/ SB A320-54-1027 Revision 03

Ref/D/ SB A320-54-1027 Revision 02

Vanilla Air [VNL] (A320 airplane operator in Japan) would like to comment on EASA PAD 17-084R1.

VNL has inspected the Pylon AFT Fairings on A320 A/Cs per Ref/C/ and Ref/D/ SB under Ref/A/ and found Crack on 80% of fleet A320 A/Cs inspected at Total landings around 4000 FC.

Ref/C/ and Ref/D/ SB specify two kinds of inspection methods of “ON AIRCRAFT” and “ON BENCH”.

From the experience crack was found in most aircraft during inspection and removed AFT Fairing for repair, VNL stopped inspection “ON AIRCRAFT” method and removed the AFT Fairing by all means in a preparatory stage and inspected and repaired it “ON BENCH”.

Now, Ref/A/ Note-1 specifies as following:

“Non Destructive Test Manual (NTM) 54-51-80 inspections, as referenced by SB A320-54-1027 Revision 03, must be accomplished, as applicable, in accordance with the instructions of NTM revision N°116, dated 01 November 2017, or later.”

However, The NTM 54-51-80 ultrasonic inspection is required for the “ON AIRCRAFT” method only, not required ON BENCH method per Ref/C/ SB.

VNL has performed detailed inspection on AFT Fairings ON BENCH without NTM 54-51-80 ultrasonic inspection per Ref/C/ SB, and after that, performed modification per SB A320-54-1035/1036.

VNL would like EASA to clarify Note-1 on Ref/A/ that NTM 54-51-80 ultrasonic inspection must be accomplished “ON AIRCRAFT” inspection method only.

EASA response:

Comment not agreed: the AD already specifies NTM 54-51-80 inspections “as referenced in the SB”, and the SB clarifies that, in certain configuration, the NTM inspections can not be performed on Aircraft and the On Bench detailed inspection must be accomplished. No changes have been made to the Final AD in response to this comment

Commenter 3: easyJet Airline – Andrew Knight – 09/02/2018

Comment # 3



Here are EYZ observations on PAD 17-084 Rev 01.

- A) There are a couple of typing errors with reference to the revision number of SB A320-54-1027 where it states revision 032 (Para 2; Para 4).
- B) The applicability list states all MSN's which are post mod 33844 and it is only when you read the paragraphs and notes that you find aircraft post mod 159806 or 156765 are not effective. Can paragraphs 8 and 9 be reworded and added under the applicability section?
- C) Credit section Para 5 states "Inspections accomplished on an aeroplane before the effective date of this AD in accordance with the instructions of Airbus SB A320-54-1027 at Revision 02, are acceptable to comply with the initial requirements of paragraph (2) of this AD for that aeroplane.". Para 2 provides a compliance time from the last inspection of A320-54-1027 at original issue or Rev 01:

Table 2 – Initial Pylon AFF Inspection	
Compliance Time (whichever occurs later A, B or C)	
A	Before exceeding 5 000 FC or 7 500 FH, whichever occurs first, since aeroplane first flight
B	Before exceeding 2 500 FC or 3 750 FH, whichever occurs first, since the latest inspection per SB A320-54-1027 original issue or Revision 01
C	Within 750 FC or 1 500 FH, whichever occurs first, after the effective date of this AD

Also, the current AD 2014-0154 only mandates the original issue of SB A320-54-1027. As such, I feel Para 5 should be revised to provide credit at all previous revisions of A320-54-1027, as credit Para 6 provides credit for all previous revisions for any repairs performed.

D) Para 10 states that fitting an approved fairing as per Table 3 "...constitutes terminating action for the repetitive inspections required by para (1), (2) or (3) of this AD for that AFF of that aeroplane". This statement has some ambiguity to it. It seems to imply that it is acceptable to install a single approved AFF on one side of the aircraft only. Can this please be clarified? Can an operator fit a single fairing (in case of a single finding under A320-54-1027) and return the aircraft to service with an intermix of pre-A320-53-1035/A320-54-1036 and post A320-54-1035/A320-54-1036 fairings?

E) Para 12 states that installation of an approved AFF "...after the effective date of the AD is equal to compliance with the requirements of (9) of this AD for that aeroplane..." This appears to be in contradiction to Para 10 as it references just the aeroplane and not "...that AFF of that aeroplane," however, neither paragraphs state that in the case of one fairing (LH or RH) having a finding under A320-54-1027 that both fairings require replacement. Can this please be clarified? An answer to this, either way, would make a huge amount of difference to the operator with regards to flexibility of replacing fairings with findings under A320-54-1027. Currently, Airbus allow an intermix of pre and post A320-54-1036 fairings that are certified under Technical Adaptation for a time limited period of 12 months.



EASA response:

3A) Comment agreed – The final AD has been corrected

3B) Comment not agreed: some paragraphs of the AD are also applicable for post mod 159806 or 156765 aeroplanes (e.g., paragraph 11). Furthermore, an aeroplane post mod 159806 is not affected by paragraph (1) to (3) of the AD only if the determination as required by paragraph (8) of the AD is accomplished. The determination itself is a requirement, which makes the AD applicable to that aeroplane.

3C) Comment not agreed: paragraph (2) requires using the Sb at rev. 04, which includes additional work (inspections) for aeroplanes inspected in accordance with the SB at original issue or at revision 01. The additional work is already included in the SB at rev 02 and rev 03. To be noted that AD 2014-0154 accept using later revision of SB A320-54-1027 for compliance.

3D) Comment noted: mixed configurations can be installed provided that installation is accomplished in accordance with approved data. In case of doubt, the operator can contact Airbus for information. Approval of mixed configuration is not in the scope of this AD.

3E) Comment agreed: Paragraph (12) has been updated accordingly.

No changes have been made to the Final AD in response to comments 3B, 3C and 3D

Commenter 4: Lufthansa Technik AG – Florian Dietsch – 09/02/2018

Comment # 4

A) Paragraph 2, Table 2, Column B and Paragraph 5: Why is there a difference between the requirements for the initial issue + Rev. 01 and Rev. 02. Column B in Table 2 should be changed as: “Before exceeding 2500FC or 3750FH, whichever occurs first, since the latest inspection per SB A320-54-1027 original issue or Revision 01 or Revision 02.” Paragraph 5 should be changed into: “Inspections accomplished on an aeroplane before the effective date of this AD in accordance with the instructions of Airbus SB A320-54-1027 at original issue, Revision 01 or Revision 02, are acceptable to comply with the initial requirements of paragraph (2) of this AD for that aeroplane.”

B) Paragraph 3: As the threshold for POST-MOD 156593 aircraft has been at 5000FC/7500FH as per AD 2014-0154, there should be the following information added: “If inspection as per SB A320-54-1027 has already been started on an airplane POST-MOD 156593, the repetitive inspection can be postponed until the threshold of 10000FC or 15000FH is reached.”

C) Paragraph 7: Please add “...unless otherwise stated in a RDAS or Airbus approval”.

D) Paragraph 8: Change sentence to: “An airplane delivered with MOD 159806 is not affected...”.

E) Paragraph 12: What is meant by “approved” P/N? For better understanding change to: “new P/N introduced by Airbus”.



F) Typo in several paragraphs: SB A320-54-1027 Revision 32.

EASA response:

4A) Comment not agreed: the SB rev 04 includes additional work (inspections) for aeroplanes inspected in accordance with the SB at original issue or at revision 01; the additional work is already included in the SB at rev 02 and rev 03, for which full credit can be provided.

4B) Comment not agreed: the AD already clarifies that paragraph (3) supersedes the requirement of paragraph (1).

4C) Comment not agreed: the applicable corrective actions required by this paragraph are those referred to in the SB rev 04, which are not terminating actions, unless when reference is made to Airbus SB A320-54-1035 or A320-54-1036, which are addressed by paragraph (9) of the AD.

4D) Comment not agreed.

4E) Comment not agreed: the new P/N could be developed by a DOA other than Airbus DOA and approved by EASA.

4F) Comment agreed – The final AD has been corrected

No changes have been made to the Final AD in response to comments 4A, 4B, 4C, 4D and 4E

Commenter 5: STARFLYER Inc. – Ryosuke Katoku – 13/02/2018

Comment # 5

SFJ is performing repetitive inspection of Pylon Aft Fixed Fairing in accordance with AIB SB54-1027 Rev.03 Task 541027-832-804-001 - Detailed Inspection of the Pylons Aft Fixed Fairing Structure **on Bench**.

In AIB SB54-1027 Rev.03, we can choose the method of Task 541027-832-801-001(Detailed and Special Detailed Inspections of the Pylons Aft Fixed Fairing Structure on Aircraft) or Task 541027-832-804-001(Detailed Inspection of the Pylons Aft Fixed Fairing Structure on Bench).

However, In EASA PAD No.:17-084R1 (2) Note column, only Special Detail Inspection by NDT is described. It is very troubling for us.

So, Please add a description about Task 541027-832-804-001 - Detailed Inspection of the Pylons Aft Fixed Fairing Structure on Bench in EASA PAD No.:17-084R1 (2) Note column.

And we also request similar contents to AIRBUS.

EASA response: Comment not agreed: The AD requires accomplishment of inspection in accordance with the instructions of the SB. Any method included in the SB is acceptable. See also EASA answer to comment #2.

