COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-107

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Commenter 1: Qantas Airways Limited – Anthony Ke – 01/09/2017

Comment # 1

1. Paragraph (1.2) of this PAD specifies Detailed Inspection (DET) of the sealant at the area of pylon Compartment A. In contrast, nowhere in Airbus AOT A54R008-17 does it refer any requirements for DET. In fact, Airbus AOT A54R008-17 Paragraph 4.2.2.3 is titled 'CHECK OF SEALANT AT THE AREA OF PYLON COMPARTMENT A' and Paragraph 4.2.2.3.a states 'Perform a visual inspection of the sealing system …'. This is a cause for concern for QFA from a compliance point of view as the subject fleet inspection program is well underway – nearly 40% of a total of 48 pylons have already been inspected based on the instructions of Airbus AOT A54R008-17. Please explain if QFA is not making the right interpretation or why the terminology (level of inspection) has now changed. Taking into account the compliance date of 31OCT17 (~ 2 months from now), what is/are Airbus' recommendation(s) for those aircraft which already had inspection completed to date and if any rework is deemed necessary?

2. Similarly, Paragraph (1.1) of this PAD states DET of hydraulic components in the 'area 1' when Airbus AOT A54R008-17 Paragraph 4.2.2.1 is only titled 'CHECK HYDRAULIC COMPONENTS IN THE AREA OF PYLON COMPARTMENT A'. QFA is not so concerned here as any traces of hydraulic leakage would be apparent and only a small area has to be covered.

3. It is clear that EASA PAD 17-107 and Airbus AOT A54R008-17 only require one-time inspection of each pylon / engine drain system. Airbus also clarified in TechRequest Dossier 80333730 that the purpose of Airbus AOT A54R008-17 is to get a snapshot of the fleet in order to get a view on the condition of the in-service drain lines at the time of inspection. The idea is also to rectify any root cause contributors of a potential consequential clogging on the engine side. Airbus AOT A54R008-17 therefore does not recommend to inspect any spare engines, or to re-do the inspection following engine change. This reasoning is acceptable but should be added and explained in EASA PAD 17-107.

EASA response:

1. Paragraph (1.3) of the AD requires accomplishment of a detailed inspection (DET) to detect deteriorations defined in Airbus AOT A54R008-17 such as:

a) softening sealant

b) swelling sealant

c) missing sealant

d) de-bonded sealant

Detection of the softening sealant is possible only by touching the sealant, i.e. tactile assessment, which falls under definition of DET instead of general visual inspection.

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

2. Comment noted. See response to Q1. No changes have been made to the Final AD in response to this comment.

3. Comment noted. An AD is not intended to be a communication tool replacing manufacturer-operator communication and provides explanation why some action is required by EASA. It is not the AD purpose to explain why some action is not required. No changes have been made to the Final AD in response to this comment.