



COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-132R1

[Published on 05 March 2018 and officially closed for comments on 19 March 2018]

Commenter 1: CAE Parc Aviation – Yesim Darende – 13/03/2018

Comment # 1

We need clarification on the Definitions section for “Serviceable Fan Blade” and Required Action/Compliance Time section for “Credit”.

Both sections address to accomplishment of ECI of a fan blade of an engine in accordance with CFM International ESM task 72-21-01-200-001 Revision 55 is acceptable to comply with the requirements of paragraph (1) of this AD, as applicable, for that fan blade.

We have two sets of Fan Blades which were inspected per ESM 72-21-01-200-001 Revision 53 at its last Shop Visits and have not been flown since then.

That being the case, we would like to have Safran’s confirmations on the below ;

- 1- Was the ECI part of ESM 72-21-01-200-001 Inspection , Revision 53 ?
- 2- If that’s the case, can the subject blades inspected per Revision 53 be accepted to comply with the requirements of paragraph (1) of this AD without performing any additional inspection?
- 3- Will Safran /EASA revise the AD if ESM 72-21-01-200-001 Revision 53 is acceptable as well for clarity?

EASA response:

ECI was not included in the ESM rev. 53. Inspection in accordance with ESM rev. 53 are not acceptable to comply with the requirements of paragraph (1) of the AD. See also EASA answer to comment #2A. No changes have been made to the Final AD in response to this comment.

Commenter 2: SR Technics Switzerland – Ahmet Arda – 13/03/2018

Comment # 2



The current situation would result in a decision that previously repaired Fan Blades in stock could not be brought into a serviceable condition and would need to be declared as scrap, except a clear workscope / repair process is available because the Ultra Sonic inspection SB 72-1024 and 72-1019 are limited to on-wing application.

Meanwhile CFM confirmed our request, that an ultrasonic inspection as per CFM SB 72-1024 is suitable for blades which are in stock and were previously repaired with ESM revision 54 or lower. Please see also the attachment.

CFM confirms also, that ultrasonic inspection as per CFM SB 72-1024 will be applicable for all part number as of mid-2018.

Nevertheless this information is not given on the newest revision (R1) of the PAD 17-132 which was issued on the 5th of March 2018.

A/ May I therefore kindly ask you to confirm CFMs statement as mentioned below?

B/ And could you please confirm this information will be given in the AD?

1/2 Q: What kind of workscope is required to Fan Blades, which are on stock, having been repaired / overhauled before Rev 55 of ESM 72-21-01-200-001 (without ECI inspection) and Ultrasonic Inspection not performed in acc. with SB (SB 72-1024) to bring them into "serviceable" condition?

1/2 A: CFM advices you to perform the SB 72-1024 of ultrasonic inspection on these blades so that you do not have to remove the coating to inspect them per ECI.

CFM and other operators have made the same comments to the authorities, without any response as of today.

1/2 Q: Could you please synchronize the effectivity and affected part numbers on the AD 17-132, SB 72-1024 and SB 72-1019.

2/2 A: Please be informed that the future on wing inspection planned for mid-2018 is a repetitive UTI for all fan blades P/N.

EASA response:

2A) EASA confirm that, for a fan blade on stock, and previously inspected in accordance with ESM rev 53, inspecting off-wing that blade in accordance with the instructions of SB 72-1024 is acceptable for compliance with the requirements of paragraph (1) of this AD

2B) A new AD is expected to be issued. As stated in the Reason, this AD is considered an interim action

No changes have been made to the Final AD in response to these comments.



Commenter 3: Transavia – Maarten Slinger – 16/03/2018
Comment # 3

- Please consider to add the following to Definitions: Serviceable fan blade in order to avoid any confusion or dispute with our local Authorities. (..) in accordance with CFM International Engine Shop Manual (ESM) task 72-21-01-200-001 Revision 55 **or higher**.
- Please consider to add the following to Credit: (3) in order to avoid any confusion or dispute with our local Authorities. (..) in accordance with CFM International ESM task 72-21-01-200-001 Revision 55 **or higher** is acceptable to comply (...)

EASA response:

Comment agreed: final AD has been updated accordingly.

Commenter 4: Ryanair – John Linnane – 16/03/2018
Comment # 4

- RYR notes that in Paragraph 3 “Credit” the PAD states operators can take credit with the requirements in Paragraph 1 by accomplishing an ECI of a fan blade IAW ESM Task 72-21-01-200-001 Rev 55. RYR would like to see verbage included that would state: “Rev 55 or later” to ensure that any inspections accomplished IAW with a later Revision of the manual would be an acceptable means of compliance.
- RYR would also like to see ESM Task 72-21-01-200-001 Rev 55 included in the paragraph titled “Ref. Publications”. This paragraph of the PAD has a provision that states “The use of later approved revisions of the above mentioned documents is acceptable for compliance”. By adding this ESM task to this section of the PAD the operator could use this provision to satisfy Ryanair’s earlier comment.

EASA response:

See EASA answer to comment #3



Commenter 5: United Airlines – Jenalissa Hendricks – 16/03/2018

Comment # 5

A) Definition: Serviceable fan blade –

United Airlines proposes to add “**or later**” to CFM International Engine Shop Manual (ESM) task 72-21-01-200-001 Revision 55.

ESM is currently at Revision 57 and includes eddy current fan blade inspection.

B) Required Action(s) and Compliance Time(s):

Inspection –

United Airlines proposes to change Inspection compliance time from within 9 months to “within 18 months”.

For operators who do not yet track fan blades individually by serial number and part number, each fan blade in their fleet will need to be removed from the engine and inspected for effective part numbers. This requires additional time.

C) Credit –

United Airlines proposes to add “**or later**” to CFM International Engine Shop Manual (ESM) task 72-21-01-200-001 Revision 55.

ESM is currently at Revision 57 and includes eddy current fan blade inspection.

EASA response:

5A and 5C) See EASA answer to comment #3

5B) Comment not agreed: review of available data does not support extending the compliance time. No changes have been made to the Final AD in response to this comment.

Commenter 6: JAL Engineering – Shunsuke Yamaguchi – 19/03/2018



Comment # 6

We had information from GE that the new SB which instructs to perform USI for all fan blade P/Ns including repetitive inspection will be issued in near future. So ,we propose to wait to issue this AD in this time, and issue AD to perform USI for all fan blade P/Ns including repetitive inspection after the new SB is issued.

EASA response:

Comment not agreed: review of available data does not support postponing the inspection required by this AD. See also EASA answer to comment 2B. No changes have been made to the Final AD in response to this comment.

