



COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-147

[Published on 18 October 2017 and officially closed for comments on 25 November 2017]

Commenter 1: Qantas Airways – Wayne Nelson – 29/10/2017

Comment # 1

Having reviewed the PAD and QANTAS records I noted that we have a number of Main Fittings affected.

I also noted that accomplishment of the attached VSB 740-32-033 to the Main Fittings (applicable to all Serial No.s) changes the Part No. of the Fittings to 50-2004262-02.

Correspondence with SAFRAN has confirmed that whilst VSB 32-033 is recommended for ALL 50-2004262-01 standard Main Fittings, the intent is also to remove the life limit restrictions for 'Affected Parts' as proposed in the PAD.

Could you please review the above including the attached VSB and confirm if a) the MOD will be considered in the AD at issue and b) confirm whether 'affected parts' will be managed any differently once modified?

EASA response:

The AD requires replacement of affected parts – identified as NLG main fittings Part Number (P/N) 50-2004262-01, and having serial number (s/n) listed in Table 2 of this AD, and NLG sliding tubes P/N 50-2004248-00, identified by s/n in Table 3 of this AD – before exceeding the thresholds defined in the AD. Modification of the main fittings P/N 50-2004262-01 by incorporating SAFRAN VSB 32-033 changes the P/N of the NLG main fitting to P/N 50-2004262-02. No action is required by this AD for NLG main fittings P/N 50-2004262-02.

EASA partially agrees with the comment and amended the Final AD for clarity adding Note 4.

Commenter 2: Air France Industries – Olivier Holander – 06/11/2017

Comment # 2

Ref./A/ : EASA PAD 17-147 dated 18 Oct. 2017,



Ref./B/ : AIRBUS OIT 999.0014/17 Rev.00 dated 27 Jul. 2017,

Ref./C/ : AIRBUS Tech Request # 80338733,

Ref./D/ : AIRBUS SB A380-32-8097,

Ref./E/ : SAFRAN VSB 740-32-033,

Dear all,

Air France engineering received ref./A/ and we have some questions.

In the ref./A/, EASA require to replace parts identified in table 2 & 3 of this AD before exceeding the reduced life limit as identified in table 1 of this AD, i.e. 9000FC for NLG main fitting and 14000FC for NLG sliding tube.

Moreover, it's allowed to install an affected part on an airplane, provided the part has not exceeded the reduced life limit as defined in table 1 of this AD.

In the ref./A/, EASA doesn't develop modification issued by AIRBUS & SAFRAN Landing Systems to modify the retraction actuator lug interface area to reduce the stress concentration identified during testing (ref./D/ & /E/). This modification introduces the new NLG main fitting P/N 50-3004262-02 which increase life limit of 10480FC. Introduction of this NLG main fitting is described in paragraph 4 of ref./B/.

To avoid misunderstanding, and confirm that main fitting P/N 50-2004262-01 will reach "full" life limitation after embodiment of modification, Air France has already asked confirmation from AIRBUS via ref./C/, and it's clear :

--QUOTE--

We confirm to you that the embodiment of MOD 77015 (via SB A380-32-8097) enables to extend the life limitation to 10480 LDG for all NLG Main Fitting (subject or not to the 300M quality issue).

--UNQUOTE--

So, PAD is incomplete and some information are missing.

To avoid misunderstanding and revision of EASA AD, could you please update content of this ?

EASA response:

See respond to comment #1

Commenter 3: Air France Industries – Olivier Holander – 09/11/2017



Comment # 3

This PAD only concerns NLG main fittings P/N 50-2004262-01.

Today, we may have misunderstanding because we have:

- PAD 17-147 which a certain batch of NLG main fittings, with reduced life limit to 9000FC due to 300M material quality issue,
- AIRBUS ALS Part 1 with current life limitation, i.e. P/N 50-2004262-01 = 140000FH/10480FC and P/N 50-2004262-02 = 140000FH/15200FC,
- SAFRAN VSB 740-32-033 which changing all NLG main fittings 10-200401 series not including -015 (main fitting MPN 50-2004262-01). This modification was published due to main fitting retraction lug ruptured in fatigue inside the grease holes,

So, as the AD will “supersede” AIRBUS ALS P1 & VSB, operators will understand to remove from service the affected parts before exceeding the reduced life limit and scrap this part. Nevertheless, after application of VSB, we will reach “full” life limitation even on S/Ns listed in the AD.

Following our point of view, it should be interesting to state in the AD that application of SAFRAN VSB 740-32-033 will permit to reach “normal” life limit on this part, because no other documents (ALS, VSB,...) refer to that.

EASA response:

See respond to comment #1. Additionally, EASA confirms that the AD does not require ‘scrapping’ the removed affected part.

