



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-009

[Published on 22 January 2018 and officially closed for comments on 19 February 2018]

Commenter 1: Lufthansa Technik AG – Dennis Selinger – 31/01/2018

Comment # 1

- A. Does EASA consider the Inspection SBs (see Note 1) as mandatory action in upcoming AD or are they only a guideline to read-out affected reservoirs? ? If EASA does consider Note 1 as mandatory, can you please rewrite it under Replacement as additional paragraph (5.1).

New requirements of this AD:

Replacement:

- (5) For Group 1 aeroplanes: Within the compliance times specified in Table 3 of this AD, as applicable, replace each affected part (see Note 1 of this AD) in accordance with the instructions of applicable Modification SB.

Note 1: The Inspection SB provides instructions to identify an affected part, subject to replacement.

- B. Does EASA consider the re-identification of the P/N of the HR PRV that are not affected as well as the PN of the HRs that are not equipped with an affected part (see Note 2) as mandatory action in upcoming AD ? If EASA does consider Note 2 as mandatory, can you please rewrite it under Re-identification as additional paragraph (6.1).

Re-Identification:

- (6) Concurrent with the affected part replacement as required by paragraph (5) of this AD, re-identify the P/N of the affected HR, as specified in Table 3 of this AD, in accordance with the instructions of the applicable Modification SB.

Note 2: The applicable Modification SB also provides instructions for re-identifying the P/N of HR PRV that are not affected, as well as the P/N of the HRs that are not equipped with an affected part.

DLH would not interpret a note as mandatory action and would rather consider a note as a potential action. Can you please clarify this?

EASA response:



A. Comment understood, but not agreed. What the AD requires is the replacement of affected parts, to be accomplished using the instructions of the modification SB. The inspection SB in itself is not required in this case as it is only for identifying if affected parts are installed. Any other method to identify if affected parts are installed would therefore be acceptable.

B. Comment understood, but not agreed. Re-identification of non-affected parts is not required, as these parts are not subject to any unsafe condition. However, for tracking purposes, EASA agrees with Airbus recommendation that operators re-identify all parts [AIR] for traceability and future parts compatibility reasons

EASA confirms that Notes in ADs are not mandatory – do neither contain required actions, nor compliance times – but do provide useful information. No changes have been made to the Final AD in response to Points A. and B. of this comment.

Commenter 2: Hi Fly – Rui Cavaco – 12/02/2018

Comment # 2

- A. The restatement of the requirements of EASA AD 2016-0107 seems only to be partial, because paragraphs (1) to (4) of the final AD now seem narrowed to aircraft fitted with PRV P/N 42F0026 with serial number listed in the applicable VSB (i.e. Group 1 aircraft), whereas the equivalent requirements of EASA AD 2016-0107 are applicable to aircraft fitted with PRV P/N 42F0026 irrespective of its serial number.
- B. Note 2 on the final AD is confusing because it is also pertinent to Group 2 aircraft, but seems to be dedicated to Group 1 aircraft that could have unaffected parts installed as well.
- C. Definition “Applicable Vendor SB” is established but apparently invoked as definition “applicable VSB”. Please consider harmonization.
- D. Term “applicable” could be missing behind “Inspection SB” in Note 1.

EASA response:

A. Comment understood. The interpretation of the situation is correct. After some technical investigations, it was identified that only a specific batch of HR PRV were affected.

B. See answer to Comment #1, Point B.

C. Comment agreed. The Final AD has been amended in response to this comment.

D. Comment agreed. The Final AD has been amended in response to this comment.

No changes have been made to the Final AD in response to Points A. and B. of this comment.



Commenter 3: TAP – João Guimarães – 19/02/2018
Comment # 3

Regarding the PAD 18-009, we kindly submit the following comments/suggestions in order to:

A. Make more clear the APPLICABILITY, by adding a similar text as per AD 2016-0107 in the APPLICABILITY field:

Airbus A330-201, (...) aeroplanes, all MSN, "..., if fitted with Hydraulic Reservoir (HR) Pressure Relief Valve (PRV) Part Number (P/N) 42F0026 installed on TECHSPACE HR having P/N 42F1005, or P/N 42F1203, or P/N 42F1304, or P/N 42F1412, P/N 42F1512 or P/N 42F1607."

B. Ease the reservoir inspection tasks and the APPLICABILITY assessment, by allowing a review of the delivery/maintenance records in lieu of making a physical inspection to the reservoirs by including a similar information to:

"A Review of the airplane delivery and/or maintenance records is acceptable to make the determination of the Hydraulic Reservoirs installed, in lieu of inspecting the Hydraulic Reservoirs, provided that those records can be relied upon for that purpose and the P/N and S/N of the affected parts can be positively identified from that review."

EASA response:

A. Comment not agreed. The intent of the AD is not only to correct aeroplanes having an affected part installed (group 1 aeroplanes), but also to make sure that an affected part is never installed on aeroplanes which do not have one installed (group 2 aeroplanes). For this reason, this AD is applicable to all aeroplanes, and for group 2 aeroplanes, paragraph (8.2) is relevant, prohibiting installation of an affected part, from the effective date of this AD.

B. Comment not agreed. The sentence as specified in the comment is no longer used in an AD. Any method to identify if an affected part is installed is acceptable and only the replacement of affected part is required.

No changes have been made to the Final AD in response to Points A. and B. of this comment.

