



European Union Aviation Safety Agency

COMMENT RESPONSE DOCUMENT

Commenter 1: United Airlines – Neil Sorensen – 21/02/2018

Comment # 1

- A) Paragraph (1), (6) and (7): Please allow the accomplishment of SB A320-53-1251 as an acceptable alternative to comply with the INITIAL inspection for paragraph (1). SB A320-53-1251 has pre-requisites (Subtask 531251-270-201-001) to inspect the same fastener holes as SB A320-53-1258, prior to the modification in SB A320-53-1251. Due to the high rate of damage findings, we are repairing and/or modifying per SB A320-53-1251 well below the paragraph (3) modification threshold. Allowing accomplishment of SB A320-53-1251 in lieu of A320-53-1258 eliminates the redundant task of two Service Bulletins that accomplish the same inspection and corrective actions.
- B) Paragraph (2): For the corrective actions, please allow an alternate option to repair in accordance with SB A320-53-1251. The corrective actions within SB A320-53-1258 already refer to A320-53-1251 if cracks are within limits of the side box beam flange cutout area. However, SB A320-53-1258 first requires you [if possible] to oversize the cracked hole(s) in successive steps up to 2nd oversize. It isn't clear why the instructions state to oversize "if possible". One possible interpretation of this means that there's no benefit of this action. UAL has seen crack findings visible well beyond the fastener hole(s). And it is obvious that reaming the cracked hole up to 2nd oversize will not repair the hole; only the side box beam flange cutout will correct the damage. Therefore, it is not always necessary ream the holes in successive steps as stated in SB A320-53-1258. Secondly, once you ream the cracked hole to 1st oversize, the repairs and modification per SB A320-53-1251 can no longer be accomplished without deviation. SB A320-53-1251 (Subtask 531251-831-203-001) requires these affected holes to be cold expanded from a nominal hole size. Whereas if you perform the repairs per SB A320-53-1251 (Subtask 531251-833-201-001) by cutting and filling the side box beam flange, the upper pressure plate will not have oversized fastener holes, allowing you to repair in accordance with SB A320-53-1251 without deviation. In addition, Airbus has statements in SB A320-53-1258 that they highly recommend accomplishing SB A320-53-1251 prior to exceeding 1st oversize fastener holes due to the modification limitations.
- Due to the above corrective action issues within SB A320-53-1258, as an alternative, please allow repairs to be accomplished in accordance with SB A320-53-1251 so that operators do not need to contact Airbus for unnecessary repair/deviation approvals.



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C) Please address discrepancies within SB A320-53-1251 R03 in the final AD. Airbus published OIT 17-0016 informing operators of discrepancies involving corrections to hole sizes, number of fasteners to remove, and wire harness procedures. According to this OIT, SB A320-53-1251 R04 is overdue (planned 4th quarter 2017). So, please either incorporate these corrections or wait the release of SB A320-53-1251 R04 for the final AD.

EASA response:

A) Comment not agreed: aeroplanes embodying SB A320-53-1251 are not required to be inspected as required by paragraph (1) of the AD.

B) Comment partially agreed: Airbus clarified that “If possible” refers here to the fact that a first oversize may have been performed within a previous inspection as per SB A320-53-1258, rendering a 1st oversize not feasible since the hole would already have reached a size equal or bigger than of first oversize.

In several cases, an oversize was proved to be sufficient to remove detected crack(s). Since the cut-out solution is more costly and time constraining for the operator, Airbus would like to first give the chance to go towards a repair solution which is easier to embody.

And although both repairs enable to reach a TH above ESG, the Oversize repair is still regarded as more robust, hence the will to first cope with the crack through a simple Oversize than to directly allow the Cut Out.

In case where the cracks would still be present after the oversizing steps, the Customer has anyways still the possibility to perform the Cut-Out. Based on this information, it is confirmed that the first option for repairing the crack should remain a successive Oversize, before that the possibility to perform the Cut-Out is given.

SB A320-53-1254 R04 has been issued to propose solution for the oversized holes. AD has been amended to mention that latest SB revision.

C) Comment agreed: the final AD has been amended accordingly

