



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-033

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Commenter 1: All Nippon Airways – Hiroyuki Tanizaki – 03/04/2018

Comment # 1

- A. Regarding to Terminating Action(s) (8), does EASA agree the in-shop inspection of the front face in accordance with RR SB TRENT1000 72-J353 may be substituted for two consecutive inspections of the NMSB? If EASA agrees above, could you add RR SB TRENT1000 72-J353 in paragraph (8) in Terminating Action(s)?
- B. Section 1.C.(8) of RR SB TRENT1000 72-J353 describes “If the IP rotor seal is exposed as part of the engine workscope, an equivalent visual inspection of the seal head is considered an acceptable alternative to the borescope inspection. The acceptance criteria shown in Fig.1 are still applicable.”. Does EASA agree the visual inspection of the seal head may be substituted for two consecutive inspections of the NMSB? If EASA agrees above, could you add the visual inspection of the seal head in paragraph (8) in Terminating Action(s)?
- C. In addition to above, does EASA agree two visual inspections of the seal head which is performed by two independent inspectors at the same time may be substituted for two consecutive inspections of the NMSB. ANA thinks the visual inspection if the IP rotor seal is exposed as part of the engine workscope is higher reliable inspection result than borescope inspection and two independent inspectors can remove the risk of human error.
- D. Regarding to Paragraph Definition Group, can the word “ESN 10554 and higher” be deleted in Group 2? IP compressor module can be replaced to other engine and the affected seal could be installed to ESN 10554 and higher.

EASA response:

- A. **Comment not agreed. Refer to paragraph (2) “An in-shop inspection in accordance with the instructions of RR NMSB TRENT 1000 72 J353 may be substituted for an on-wing inspection as required by paragraph (1) of this AD, provided the compliance times are not exceeded.” The in-shop inspection cannot be substituted for 2 on-wing inspections.**
- B. **Comment not agreed; see EASA answer to point A. above.**
- C. **Comment not agreed. The repeat inspection is not only there to avoid human error, but also to detect a crack that may not be visible at the first inspection, including seal head inspection.**



D. Comment not agreed. The Group 2 definition includes the statement “provided the engine remains in that configuration”. This means that, if an affected seal is installed (e.g. by installing an affected IP compressor module) on such an engine, it is no longer a group 2 engine, but a Group 1 engine.

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

