



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-039

[Published on 15 March 2018 and officially closed for comments on 12 April 2018]

Commenter 1: Cathay Pacific Airways – John Chiu – 20/03/2018

Comment # 1

I would like to ask for clarifications on paragraph (1) repeat inspections:

In paragraph (1) repetitive inspections, the inspection method is not clear for engines that have previously been repaired under (2) Corrective action. The AD and the applicable NMSB do not provide inspection procedure to inspect engines that have been fitted with a repaired bracket as per FRSJ739.

According to previous communication with Rolls-Royce, it was recommended to carry out below alternate procedure for post FRSJ739 repair: “Repeat inspection of the bottom right hand side seal face 22 - Zone A can be carried out with the repair bracket remained fitted. The inspection criteria for the “Zone A” of the original fairing material (pre-FRSJ739) and the repaired fairing material (post-FRSJ739) remain the same i.e. the inspection of repaired bracket conforms to the original “inspection intent” of NMBS72-AJ165.”

Cathay would like to know if EASA agrees to the above statement, and we would like EASA to consider adding this statement to the proposed AD.

EASA response:

Comment not agreed. Although EASA agree in general with the Rolls-Royce statement, it is clear that the inspection method does not change after repair. Even though the repair bracket does not have to be removed to enable the next inspection, EASA does not consider this to be an ‘alternative method of compliance’. In addition, the pass/fail criteria (as the message confirms) also remain unchanged.

For that reason, there is no need to include this information in the AD, as the instructions of the NMSB remain applicable for post-repair engines, pending modification of an engine as required by paragraph (3).

No changes have been made to the Final AD in response to this comment.

