



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-054

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Commenter 1: Lufthansa Technik AG – Rene Schinkel – 24/04/2018

Comment # 1

Please find below DLH's and LHT's comments for EASA PAD 18-054:

- A. Qualified shopvisit definition: Please define if engine and/or module Level 2 shopvisit is meant.
- B. Requirement not to install a second affected engine on one aircraft implicates that the risk for dual IFSD is too high. How does that match with End January 2023 and the incorporation of NMSB only at Level 2 shopvisit or higher? For our understanding NMSB should be accomplished regardless of workscope incl. Hospital Shopvisits.
- C. Regarding action (3): please define for module swaps if shopvisit Level of the engine the module installed to before or after shopvisit must be obeyed to comply with "qualified shop visit" section.
- D. We removed three Engines (with LPT S/N HH0120, HH0123 and HH0154 installed) proactively due to high failure risk, not all of the engines are already inducted in the overhaul shop. There is currently no statement in the AD to accomplish the NMSB during current time offwing or current shopvisit (once the engine is inducted) regardless of workscope level. Is it intended that it is possible to reinstall these modules on any engine without accomplishment of the NMSB resp. to reinstall the engines without shopvisit? For our understanding the NMSB must be accomplished during current SV.

EASA response:

- A. Comment agreed. The Final AD has been amended accordingly.**
- B. Comment agreed. On reconsideration, also taking into account the limited number of affected engines/modules, the risk assessment determined that the probability of dual IFSD is actually below the applicable continued airworthiness threshold. This removes the justification for the requirement of paragraph (2). The Final AD has been amended accordingly, deleting the limitation.**
- C. Comment not agreed. The nature of the shop visit to install an affected module on an engine does not need to be defined.**



D. Comment noted. The intent of the AD is to have the engines/modules corrected within a reasonable time period. For affected engines/modules that are currently not in service (stored or in-shop), corrective action is not required before release to service, but as specified in paragraph (1) of the AD.

No changes have been made to the Final AD in response to points C. and D. of this comment.

