



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-060

[Published on 26 April 2018 and officially closed for comments on 24 May 2018]

Commenter 1: Wayne Nelson – Qantas Airways Limited – 01/05/2018

Comment # 1

References: /1/ AD 2015-0136 R1; /2/ PAD 18-060; /3/ SB A380-55-8002 Rev02 Dated 20-Apr-2018

QANTAS is reviewing the subject PAD and would like to make some comments regards the actions and intent of this PAD as well as related SB 55-8002 at Rev. 02. Firstly, QFA well understands the unsafe condition as stated in the Ref /1/ AD and Ref /3/ SB (at initial issue) and that the required inspection & corrective actions (where required) were one time only. QFA also notes that the Ref /2/ PAD has been issued effectively in response to “further investigation and AIRBUS issuing Rev. 02 of the Ref /3/ SB to “repeat the DET in case of finding bush migration”. What is not clearly stated in either Ref /2/ or Ref /3/ is, what the investigations determined and why only previously affected aircraft are subject to the repetitive inspections.

A. As all QFA aircraft are now compliant with the Ref /1/ AD, could AIRBUS (& EASA) please confirm that the real intent of Ref /2/ PAD Requirement (2) is for operators to review their inspection records against Ref /1/ AD and if bushing migration was reported, then operators are to carry out a 2nd inspection on the affected aircraft/elevator*, repeating thereafter at the intervals provided?

* If only 1 elevator was affected during the initial inspection, should only that elevator be subject to repeat inspection?

B. Requirement (7) of the Ref /2/ PAD (terminating action) states “during any DET as required by Para. (2)no bushing migration is detected that finding constitutes terminating action”. If the terminating action is nil bushing migration found during any DET then shouldn't Requirement (7) make reference to Req's (1) & (2)?

C. As neither Ref /2/ or Ref /3/ make reference to additional findings subsequent to compliance with Ref /1/ inspections is it correct to interpret this as “the unsafe condition” described in the Ref /2/ PAD is and will only be evident on A380 aircraft identified with bushing migration during the one time DET and have had the corrective actions carried out as instructed by AIRBUS?

D. Further to point C, according to Ref /2/ & Ref /3/ aircraft which have been (a) found with bushing migration and (b) repaired IAW the SRM as referenced in Ref /3/ are still considered to be at risk of the unsafe condition until a (any) subsequent repeat inspection confirms no bushing migration evident?

E. As the Ref /1/ AD and Ref /2/ PAD are applicable to ALL A380's QFA finds it difficult to believe that without any change in design (i.e. Modification) that all aircraft irrespective of whether bush migration is or was not found would not still be considered a risk of further findings in the future. And



therefore exposed to the unsafe condition. Hence QFA would appreciate some clarification of the logic applied, particularly to the PAD, otherwise QFA can see no alternative than to repeat inspect ALL aircraft ongoing.

EASA response:

- A. Comment agreed. This is indeed the intent. The Final AD has been amended to specify that only for those locations (elevators) on which migration was found during the first inspection, action is required.**
- B. Comment not agreed. Paragraph (2) introduces repetitive inspections, only for those parts [see EASA answer to point A. above] where migration was detected during the action as required by §(1) – which is the retained requirement from AD 2015-0136R1. No action is required for those without migration per §(1) – since no repetitive inspections are started, ‘terminating action’ is not relevant for §(1).**
- C. Commenter’s understanding is correct.**
- D. Commenter’s understanding is correct.**
- E. Comment not agreed. Investigation determined that, when no migration is found during any inspection, the chance of recurrence of migration is remotely unlikely.**

No changes have been made to the Final AD in response to points B. through E. of this comment.

Commenter 2: Emirates – Shoaib Rehmatullah – 02/05/2018

Comment # 2

References: /1/ EASA PAD 18-060; /2/ EASA AD 2015-0136 R0 & R1; /3/ Airbus SB A380-55-8002 R02; /4/ Airbus SB A380-55-8002 R00; /5/ Airbus SB A380-55-8002 R01

UAE is in receipt of Ref. /1/, which is basically adding (compared to Ref. /2/) a requirement to accomplish one time repeat inspection (in-line with Ref. /3/) of aircraft found previously with bushing migration during initial accomplishment of Ref. /3/ thru Ref. /5/. Depending on the findings during one time repeat inspection, further repeat inspections at defined interval are required. A total of Qty 07 aircraft were inspected per Airbus Technical Disposition (listed in Ref. /1/ Appendix 1) between 2013 and 2015 prior to issuance of Ref. /4/. Out of the Qty 07 aircraft inspected, Qty 05 aircraft were found with bushing migration and permanently (Cat A) repaired as per Airbus repair instructions. Due to Qty 05 aircraft having previous findings, they were re-inspected as per Ref. /5/. Apart from one aircraft, remaining four aircraft were found with ‘NIL’ bushing migration.

UAE would appreciate if following clarification / confirmation can be provided:

- A. For the four re-inspected aircraft, do they still have to be repeat inspected as per Ref. /A/ Para (2) requirements?**



- B. If 'NO' to point A above, then it is our understanding that these aircraft are in compliance with Ref. /A/ Para (7) requirements?
- C. For the fifth aircraft, which had bushing migration findings again in Aug 2015, it is to be inspected as per Ref. /A/ Para (2) requirements?

EASA response:

- A. For the four (4) aeroplanes on which, upon re-inspection, no migration was found, no further action is required.**
- B. See EASA answer to point A. above. Note that paragraph (7) of the AD does not contain requirements, but provides a (conditional) 'terminating action' statement.**
- C. Commenter's understanding is correct.**
- No changes have been made to the Final AD in response to this comment.**

Commenter 3: Air France – Gueraud Gwenaël – 04/05/2018

Comment # 3

AFR has questions about paragraph (2) and (7) of PAD 18-060:

- A. In part (2): The PAD requests to accomplish the LH and RH inbd and outbd elevator hinges and actuator fittings. If in part (1), only one elevator (hinge/actuator fitting(s)) was found with bushing migration, are three other elevators concerned by repetitive inspection?
- B. In part (7): If in part (2), only one elevator (hinge/actuator fitting(s)) shall to be inspected, are three other elevators (with no bushing migration in part (1)) considered as terminate?

EASA response:

- A. Comment agreed. See EASA answer to Comment #1, point A. above.**
- B. Correct. See EASA answer to Comment #1, point A. above.**

