



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-063

[Published on 30 April 2018 and officially closed for comments on 28 May 2018]

Commenter 1: easyJet – Geremi Mattei – 02/05/2018

Comment # 1

With reference to EASA PAD 18-063 we have some question as per below:

Paragraph (5) Repetitive Inspections:

EZY has been doing Airbus SB A320-32-1441 (VSB 200-32-321) during the overhaul of the LG at the shop.

A) Should we consider this as terminating action as reported in the Airbus SB A320-32-1441 PARA 1 C. REASON (3) Advantages below?

This ISB also provides a terminating action through a final inspection (VSB 200-32-321 (For A318, A319 and A320) or VSB 201-32-68 (For A321)) for the presence of burrs in the lug holes. This final inspection is recommended at the next MLG overhaul, when surface protection has been removed.

B) If yes will the PAD/AD Terminating action be updated as at the moment the terminating action in the PAD is to replace the affected MLG sliding tube with a not affected sliding tube (note 7 Modification)?

C) With the current compliance time we have got 19 affected sliding tubes which requires the inspection iaw TABLE 1 (B) within 25 months or 5000FC. Would be possible to extend this requirement to the next overhaul ? In the attached file in column L, it is reported the calendar time until the next OVH (attached to original comment).

EASA response:

A, B) The inspection iaw SB 200-32-321 is accomplished at component level, during overhaul. It is not an action at aircraft level, which could constitute terminating action for the inspection required at aircraft level. The terminating action, at aircraft level, can be only the replacement of an affected part with a not affected one. A part, which passed an inspection iaw SB 200-32-321, is not affected; consequently, its installation constitutes terminating action for the repetitive inspection. No changes have been made to the Final AD in response to this comment

C) Comment not agreed: available data does not support an extension of the compliance time to the next scheduled overhaul.

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



Commenter 2: Cathay Pacific Airways Limited – Dave Martin – 07/05/2018**Comment # 2**

With reference to the definition of an “Affected MLG sliding tube”:

Per SB A320-32-1441 Rev 1, the PN and SN check of the sliding tube, to determine if listed in SB 200-32-321 or 201-32-68, includes the note:

QUOTE

A check of aircraft maintenance records is an acceptable means of compliance.

UNQUOTE

Question – will the AD also state that a maintenance records check is an acceptable means to determine if an “affected MLG sliding tube” is installed, and therefore subject to proposed requirements (5), (6), (7)?

EASA response:

Comment noted: identification of the configuration is not a requirement of the AD. Consequently, there is no need to give credit to a review of maintenance records for identification of the configuration. No changes have been made to the Final AD in response to this comment.

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

Commenter 3: Safran Landing Systems – Ivaylo Petkov – 25/05/2018**Comment # 3**

General) Safran Landing Systems considers that the primary objective of PAD 18-063 is to introduce the inspections required for the Slave Link Lugs holes on the MLG Sliding Tube from Airbus SB A320-32-1441, and Safran SB 200-32-321 & SB 201-32-68. This needs to be clearly stated and outlined at the beginning of the document as the PAD layout is not clear in its aims and objectives. It is likely to be especially unclear to operators who may not have the same depth of product knowledge as Safran Landing Systems.

The PAD partially restates previous Sliding Tube Airworthiness Directive requirements; however it is not explicitly clear how these relate to the new set of requirements. The applicability of each previous requirement should be better summarised as to what it represents and how to follow it in the structure of the PAD. To remove any ambiguity about the reason for restating previous AD requirements it is recommended to include the reason for their restatement in the text as well as to provide a clear statement as to their relevance to an affected MLG sliding tube.

Furthermore, Safran Landing Systems have the following minor comment:

A) Paragraph 5:



Suggest to replace “failures” with “cracks”.

B1) Paragraph 6:

Grammatical error: insert “a” i.e. Sliding Tube is certified as a safe life part.

B2) Replace reference to “Cracks” with “Burr” would be more logical as crack would be found during overhaul which is an existing scheduled inspection i.e. Burr in the affected sliding tubes may not be found during the existing scheduled inspection.

C) Paragraph 7:

Replace “failure” with “fracture”.

D) Paragraph 8:

Clarify that the instructions for repetitive inspections are visual on the aeroplane for cracks in accordance with Airbus SB. While a final one time inspections in shop for burr outlined by Safran SB.

i.e. “providing instructions for repetitive inspections on the aeroplane for cracks, and Safran issued SB 200-32-321 and SB 201-32-68, as applicable to MLG configuration, providing instructions for a final one time inspection in shop for burr”.

E) Paragraph 1 & 2:

Clarify – “Partial restatement” used to refer to previous AD whereas on pg. 2 para 9 “partial retention” is used.

F) Paragraph 4:

Specify - an affected part which has not passed the SDI.

G) Paragraph 4.1:

Specify SDI rather than inspection i.e. After the SDI as required by paragraph (2).

H) Paragraph 5:

Replace “Detailed Inspection (DET)” with “Special Detailed Inspection (SDI)”.

L) Paragraph 7:

It is not clear why the heading is Modification for this section. Terminating Actions is a more pertinent heading.

M) Reference is made to a “not affected MLG Sliding Tube”, which is not listed in the definition on page 1 and 2. It is recommended to derive a definition for “not affected Sliding Tube” based on the definition of “affected sliding tube”.

Note 3, “an MLG” should be “MLG”.

EASA response:

General) Safran Landing Systems understanding about the objective of this Ad is correct. This new AD also allowed superseding of two previous AD affecting the same component, and addressing similar issues. Recall and supersedure of previous AD is to limit AD overlap and ensure clear definition of a non-affected parts (parts clear of any remaining AD requirements)

A) Comment agreed. The AD has been updated accordingly

B1) Comment agreed. The AD has been updated accordingly



B2) Comment noted: the referenced “existing scheduled inspections” are inspection at aircraft level, during which cracks may not be found. Current overhaul inspection will detect cracks only. The vendor SB inspection focus on cracks and /or presence of burrs. The on wing repetitive inspections are only for cracks up to next overhaul. The AD has been updated.

C) Comment not agreed: failure is a more general term, including fractures.

D) Comment agreed. The AD has been updated accordingly.

E) Comment noted: only some of the requirements of the superseded ADs are kept in this AD, and are restated in the “Required action and compliance time” section

F) Comment not agreed: according to the definition of “affected part”, a part which has passed the SDI is not affected

G) Comment not agreed: the “inspection” referred in paragraph (4.1.) is the inspection at aircraft level, which includes the SDI of each affected part

H) Comment not agreed: “DET” is consistent with the terminology in Airbus SB A320-32-1441; furthermore, SDI is used, consistently with the wording of Airbus SB A320-32-1416, for the inspection required by paragraph (2) of the AD

L) Comment agreed. The heading has been modified

M) Comment not agreed: any MLG sliding tube not included in the definition of “Affected MLG sliding tube” is, by definition, a not affected MLG sliding tube

Commenter 4: United Airlines – Tariq Siddiquie – 11/05/2018

Comment # 4

United Airlines has reviewed the proposed PAD by EASA and concurs with the recommended actions and compliance intervals

EASA response:

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

