



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-096

[Published on 16 July 2018 and officially closed for comments on 13 August 2018]

Commenter 1: Qantas Airways – Tomo Sugano – 02/08/2018

Comment # 1

References

[A] EASA PAD 18-096 issued on 16-Jul-2018

[B] Airbus Modification SB A330-54-3041 R00 dated 17-May-2018

[C] Airbus Inspection SB A330-54-3042 R00 dated 17-May-2018

[D] SB Inspection Report - Figure A-FAAAA - Sheet 01 (of Ref [C])

[E] Airbus Tech Request Dossier ref 80489399 dated 20-Jul-2018

With regard to Ref [A] PAD, Qantas Airways would like to consult EASA on the following point:

Depending on the outcome of Ref [C] ISB inspection, pylon modification per Ref [B] is required as part of Ref [C] rectification requirements. The format of Ref [D] inspection report sheet (internal to Ref [C] ISB) readily implies only the pylon(s) (i.e. LH and/or RH pylons) affected by Ref [C] inspection results require(s) the modification i.a.w. Ref [B] Mod SB.

We have noted that Ref [B] can be interpreted as though the Mod SB were authored assuming that both pylons (LH and RH) are to be modified, as there is no stipulation made in Ref [B] regarding Ref [C] inspection outcome between LH and RH pylons.

The above observation was duly communicated to Airbus via Ref [E] for OEM clarification. Airbus has responded advising Qantas that the OEM is launching an internal review, and that we consult EASA on this observation as well regarding any clarifications desired for the proposed AD.

We request that EASA address the precise requirement for Ref [B] embodiment in case only a single pylon on an inspected aircraft has been found to require Ref [B] modification as per the Ref [C] inspection / rectification criteria.

EASA response:

Comment agreed. The Final AD requires, depending on findings, accomplishment of applicable corrective action(s) in accordance with the instructions of the Airbus SBs that, at this time, do not describe the option proposed by the commenter. After coordination with Airbus, it has been



decided that Airbus would launch an update of the SBs, in order to provide operators the possibility to only modify any pylon that needs correction, following identification of a discrepancy on one affected side. Once these revised SBs become available, the AD allows use of those 'later approved revisions' of the SBs. In addition, the Final AD now contains provisions for accomplishing the applicable corrective actions on an affected pylon. The Final AD has been amended accordingly in response to this comment.

Commenter 2: Alitalia – Stefano Biagetti – 08/08/2018

Comment # 2

References:

- /A/ Airbus Inspection SB A330-54-3042 original issue dated 17 May 2018.
- /B/ Airbus Modification SB A330-54-3041 original issue dated 17 May 2018.
- /C/ EASA PAD 18-096

BACKGROUND

Ref /A/ requires a borescope inspection of the drain pipes to detect possible contact with U-shaped ribs of the lower APF. In case of finding, Ref /A/ par. 1.E.(2) provides as ACTION the following wording: "Replace the drain pipe in accordance with TASK 543042-833-801 001 and Accomplish Modification Service Bulletin No. A330-54-3041".

Ref /B/ Modification SB A330-54-3041 provides instructions to install new redesigned bracket on the drain pipe below the LH/RH pylon and to apply G.E. Service Bulletin No. CF6-80E1 54-0002 on the lower APF to prevent further damage of the drain pipes. It seems that Ref /B/ has to be accomplished completely on both LH and RH Pylons, even in case of finding on LH or RH side only, during accomplishment of Ref /A/ inspection.

Furthermore Ref /C/ reports as Corrective Actions: "If, during the SDI as required by paragraph (1) of this AD, a pylon drain pipe is found damaged and, depending on findings, within the applicable thresholds defined in the inspection SB (Ref /A/), accomplish the applicable corrective action(s) in accordance with the instructions of the inspection SB (Ref /A/) and modification SB (Ref /B/)".

ACTION

1. Please clarify if Modification SB A330-54-3041 must be applied on both LH and RH side, even when Inspection SB A330-54-3042 reveals a finding on one side only.
2. Confirm that the embodiment of Modification SB A330-54-3041 on one side (LH or RH) affected by a damage detected by Inspection SB A330-54-3042, without embodiment on opposite side with no finding, complies with the requirements of EASA PAD 18-096 and subsequent EASA AD.



EASA response:

Comment agreed. See EASA answer to Comment #1.

The Final AD has been amended in response to this comment.

