



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-113

[Published on 03 August 2018 and officially closed for comments on 10 August 2018]

Commenter 1: Delta Air Lines – Alexandra Kidd – 06/08/2018

Comment # 1

Reference:

- (A) EASA Proposed Airworthiness Directive: PAD No. 18-113, dated 03 August 2018
- (B) Airbus Service Bulletin A350-29-P013 original issue, dated 12 March 2018
- (C) Rolls Royce Service Bulletin TRENT XWB 29-J944 Revision 1, dated 3 January 2018

SUMMARY

Reference (A) proposed AD was prompted by a report of an overheat failure mode of the hydraulic engine-driven pump, which could cause a fast temperature rise of the hydraulic fluid. This AD will be issued to address high hydraulic fluid temperature combined with an inoperative fuel tank inerting system, which could result in uncontrolled overheating of the hydraulic system and consequent ignition sources inside the fuel tank, which, combined with flammable fuel vapors, could result in a fuel tank explosion and consequent loss of the airplane.

DELTA'S (DAL) COMMENTS

EASA Proposed Airworthiness Directive: PAD No. 18-113

1. Within paragraph “**Required Action(s) and Compliance Time(s): Modification: (4)**”: “For Group 3 aeroplanes: Within 17 months after the effective date of this AD, replace each affected part with an improved EDP, having P/N 53098-06, in accordance with the instructions of the SB.”

And

2. Within paragraph **Ref. Publications**: “Airbus A350 SB A350-29-P013 original issue, dated 12 March 2018.”

Delta would like to highlight the following issues related to the Service Bulletin References (B) and (C).

The Airbus Service Bulletin Reference (B), paragraphs 3.C.(1)(a), 3.C.(2)(a), 3.C.(3)(a), 3.C.(4)(a) and 3.C.(5)(a), are identified as required for compliance (RC). Each paragraph states "... in accordance with Ref. ROLLS ROYCE PLC (K0680) VSB TRENT XWB 29-J944,".

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a) The word "Ref." following the "in accordance with" statement, is misleading and contradicting to the "in accordance with" / "refer to" Note at the beginning of the SB Par. 3. ACCOMPLISHMENT INSTRUCTIONS. Airbus confirmed via tech request that the word "Ref." is linked to the table name "Reference Information" at each paragraph and preceded the dedicated reference mentioned in that table after the "in accordance with" or the "refer to" statement.

b) The Rolls Royce Service Bulletin VSB TRENT XWB 29-J944,

i. Paragraph 3.D(3) states "...to the hydraulic pump body (CSN **29111101250**)..." . The CSN reference listed is incorrect; the Correct CSN corresponds to (CSN **29131101250**).

ii. Paragraph 3.D(6) states "Continue with the current overhaul procedures (**Engine Manual, TRENTXWB-A-29-11-13-00A01-720A-D**).". The Engine Manual reference is incorrect; the correct reference corresponds to **Engine Manual, TRENTXWB-A-29-13-11-00A01-720A-D**.

iii. Paragraphs 3.F. and 3.F.(6) states " ... in accordance with current maintenance procedures (Aircraft Maintenance Practice (MP), **A350-A-29-11-56-01001-720A-A**)..." . The MP listed in SB is incorrect the correct MP procedure for the EDP on the green System is **A350-A-29-11-56-00001-720A-A**.

iv. Delta notified Rolls Royce and Airbus of the typo and requested to be revised by May 30, 2018. The Revision or Technical Variance issuance ECD has not been provided by Rolls Royce or Airbus.

Based on the above information Delta Air Lines recommends the EASA to request Airbus and Rolls Royce to revise, approve and publish an updated Rolls Royce Service Bulletin VSB TRENT XWB 29-J944, to prevent the issuance of unnecessary AMOCs.

EASA response:

Comment noted. EASA transmitted the information to the TC Holder asking to analyse and to action accordingly.

Commenter 2: Delta Air Lines – Alexandra Kidd – 09/08/2018

Comment # 2

Today, Delta received notification that the Rolls Royce Service Bulletin (SB) TRENT XWB 29-J944 Rev 02 has been issued (Document Date: 07-Aug-2018 / Date Loaded: 09-Aug-2018) on Rolls-Royce Care. A review of the Rev 02 identified that only the typographic mistakes under paragraphs 3.F and 3.F.(6) have been addressed (Items listed as 2.(b).iii., on the Delta message "EASA PAD 18-113 Comments").



The typographic mistakes under paragraphs 3.D(3) and 3.D(6), of the Service Bulletin TRENT XWB 29-J944 (Items listed as 2.(b).(i.) and 2.(b).(ii.), on the Delta message “EASA PAD 18-113 Comments”), are still pending. Delta notified Rolls Royce and Airbus of the issues on Rev 02 of the SB and we requested a revision to cover the known issued as well as a full review of the entire content.

EASA response:

Comment noted. EASA transmitted the information to the TC Holder asking to analyse and to action accordingly.

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

