



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-124

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Commenter 1: Delta Air Lines, Inc. – Shawn Mahan – 04/10/2018

Comment # 1

Identifies cracking of the thrust reverser latch beam gussets on PW 4000 powered A330 aircraft as an unsafe condition. To address this unsafe condition, EASA proposes to mandate a one-time inspection per para (1), corrective action per para (2) and a parts installation restriction per para (3). Delta Air Lines, Inc. (DAL) has reviewed the subject PAD and offers the following comments.

- A. There is a disagreement in logic in between para (1) and para (3). Based on the information in the reference publications and the wording of para (1), an installed thrust reverser that has a serial number listed in PW4G-100-A78-116 but that has embodied MOD 48539 or Airbus SB A330-78-3014 would not be subject to the one time inspection per SB A330-78-3024. However, para (3) would require inspections of spare thrust reversers listed in PW4G-100-A78-116 but that do embody MOD 48539 or Airbus SB A330-78-3014 if they are installed after the effective date of the EASA AD. The inspection SB does not give instructions for inspecting thrust reversers that embody the modification SB. For clarity, DAL proposes the following change for EASA's consideration:

Affected TR: Thrust Reverser (TR) assemblies, having a serial number (s/n) listed in Pratt & Whitney SB PW4G-100-A78-116 original issue dated 20 June 2018, that do not embody MOD 48539 nor Airbus SB A330-78-3014.
- B. The inspection SB A330-78-3024 is written in RC format and states that SB A330-78-3024 para 3.C and 3.D are RC. SB A330-78-3024 para 3.D is a thrust reverser cycle test per AMM 78-31-00-710-804. This test does not directly relate to the unsafe condition of cracks on latch beam gussets and by marking this paragraph as RC, operators could not fully comply with the AD by performing the inspection on spare units. DAL proposes that the EASA AD provide an exemption to disregard the RC notation on A330-78-3024 para 3.D.
- C. Three of the reference publications are not RC format. This leads to portions (such as open up and reporting steps) of the publications that cannot be deviated from even though they do not have a bearing on the unsafe condition identified in the AD. DAL notes that when an Airbus SB step is RC, and that step directs the accomplishment of a vendor service bulleting using the language "in accordance with", then we perform the entire VSB with strict adherence. This results in a large number of AMOC requests. DAL proposes that all reference publications should be revised into RC format prior to AD release. If this cannot be performed in a realistic timeframe, DAL proposes that either the AD or Airbus Cover SB provide more specific guidance what steps are truly required to address the unsafe condition and cannot be deviated from.



For example:

Perform the one time inspection in accordance with PW4G-100-A78-116, Accomplishment Instructions, Step 5 A, B(1) and C. If cracks are found, repair in accordance with PW4G-100-78-78, Accomplishment Instructions, Step F.3; and, modify the gussets in accordance with PW4G-100-78-78, Accomplishment Instructions, Step G through K. Other steps would be required to complete the work, but should not carry the strict requirements of RC needed to address the particular unsafe condition.

EASA response:

- A. Comment agreed. The definition of affected TR has been amended and now excludes TR that have been modified in accordance with the instructions of the modification SB.**
- B. Comment not agreed. When an EASA AD requires to ‘inspect’ (or repair, modify, etc.) in accordance with the instructions of the SB, this means that the ‘inspection’ instructions of the SB must be done, nothing more, nothing less. It does not mean the entire SB (e.g. preparation before inspection, closing up after inspection) is considered mandatory and therefore cannot be deviated from without an approved AMOC, as the commenter states. A test is not an inspection, therefore the AD (§3) requires that affected TR held as spare must be inspected (i.e. pass an inspection) per the SB ‘inspection’ instructions, before allowing installation. Whether the operator chooses to also do the test (e.g. after installation) is at the operator’s discretion. Please note that the Airbus SB contains ‘aircraft level’ instructions that may not always be suitable for spares, i.e. off-aircraft actions.**
- C. Comment not agreed. There is no requirement for design approval holders to apply ‘RC’ markings to distinguish between ‘AD-required’ and non-required actions. When an SB, subject to the AD, refers to vendor publications for more detailed instructions, the AD effectively requires to accomplish only that part of the vendor SB that contains the relevant instructions, i.e. inspection, repair, modification, etc.**

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

