

COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-134

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Commenter 1: Cathay Pacific Airways Limited – Dicky Or – 12/10/2018

Comment # 1

Para (1) and (2) requires to perform an OPC of affected oxygen cylinder per AOT, this requirement is unclear.

- A. As AOT A35P010-17 already pointed out, ignition can only occur if retainer is detached and inverted during handling, there is no consequence for currently installed assy if not removed from a/c. As such, we do not see technical reason why AD propose the check on each affected assy within 6 months, in addition to the replacement action is required in para (3).
- B. The proposed requirement uses AOT A35P010-17 as reference, but the AOT specifies inspection at each removal / installation of oxygen cylinder and stock item only, if mandatory inspection is imposed for on-wing assy, it should refer to VSB 4441227-35-003 instead of AOT.

EASA response:

- A. *Comment not agreed. For airlines using the on-board refilling port to replenish crew oxygen, and thus not normally removing the cylinders from the aircraft, the six month inspection compliance time is seen as a reasonable period within the AD timeframe of 18 months to perform an initial operational check inspection of all assemblies. Note that the operational check does not require immediate replacement of affected assemblies at this time if no discrepancy is found. The intent of the initial inspection is to remove discrepant assemblies in a reasonable timeframe, identify those affected assemblies which will require replacement at the end of the 18 month compliance time, and to encourage planning to replace affected assemblies in a timely / orderly manner over the 18 month compliance time. As roughly half of the affected assemblies are estimated to be aboard aircraft using on-board refilling provisions, it is seen as prudent that actions to identify and replace these affected assemblies not be delayed further than 6 months into the 18 month compliance period.*
- B. *Comment not agreed. The AOT addresses the same AMM procedures for cylinder removal and installation required for the operational inspection of cylinders on aircraft which normally employ the on-board refilling provisions for replenishment of the cylinders. The inspection VSB does not address cylinder removal/installation, nor does it instruct when the inspections are to be performed, i.e. immediately after removal and immediately prior to installation on the aircraft. For aircraft on which cylinders are not normally removed for refilling, it is noted that only one inspection will be required if the cylinder removal, inspection and reinstallation is performed in a single operation. Any deviations from the AOT instructions required for the inspection of cylinder assemblies normally refilled on-board versus exchange of units refilled off-aircraft are*

considered minor and within the engineering judgment capabilities of maintenance organizations. The AOT additionally provides background information on the potential hazard driving the AD, which is seen as valuable to involved parties.

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

