



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-152

[Published on 12 November 2018 and officially closed for comments on 10 December 2018]

Commenter 1: European Air Transport Leipzig GmbH – Michel Krauss – 20/11/2018

Comment # 1

The German operator European Air Transport Leipzig GmbH (ICAO Code: BCS) operates 20 A300B4-622R and one A300F4-622R aircraft. Furthermore BCS has engineering responsibility of four A300B4-622R for Irish operator ASL Airlines Ireland.

BCS has previously performed inspections on effective aircraft in accordance with SB A300-57-6062, mandated by AD F-1995-063-177. The inspection interval for using ultrasonic inspection method has been reduced dramatically in PAD 18-152, compared to AD F-1995-063-177 Rev. 05. It will be reduced from 6700 FC down to 3000 FC. BCS already started the adaptation of the mandated inspection interval to the reduced interval since publication of Airbus Service Bulletin SB A300-57 -6062 (original issue dated 14 February 1995) Rev. 05 on 3rd October 2018.

The publication of this SB Rev. 05 in October 2018 did not give enough time in advance to the PAD 18-152 to accomplish the required re-inspection and adapt the inspection interval afterwards to the newly introduced interval. Due to the size of the fleet BCS is responsible for only single aircraft have been adapted down to the reduced inspection interval.

The inspection as per SB A300-57 -6062 Rev. 05 is mainly designed to be performed in Base Maintenance Environment (B-Check). Thus BCS intends to do the inspection as per SB A300-57 -6062 Rev. 05 in B-Check only.

To ensure this an interval of 24 months is required which is the B-Check interval on A300-600 fleet.

PAD 18-152 introduces a grace period of 12 months, counting from the effective date of the AD, which will not allow BCS to do the inspection as per SB A300-57 -6062 Rev. 05 in B-Check. To ensure an economical operation of the fleet of 25 Airbus A300-600 aircraft BCS needs a grace period of 24 months, counting from the effective date of the AD. This will ensure that every affected aircraft can be inspected during B-Check.

The inspection by using HFEC inspection method with inspection interval of 1400 FC is no alternative, because the interval does also not allow reaching a B-Check with any aircraft. Thus BCS relies on the long flight cycle inspection interval of the ultrasonic inspection to perform such tasks during base maintenance environment which is planned every 24 months.

BCS would like the EASA to review above comments from BCS and adapt the grace period in Table 1 and Table 2 of PAD 18-152 from 12 months to 24 months, counting from effective date of the AD.



EASA response:

Comment partially agreed. The Final AD has been amended, specifically the Tables, to detail the allowed 12 months 'grace' period, taking into account both inspection thresholds and intervals. This 12 months grace period is a generic one, applicable to the whole A300-600 fleet, to be counted from AD effective date, and cannot be further extended.

Reassessment on a case by case basis might be considered for temporary exemptions, to be approved by the State of Registry of an affected aeroplane.

Commenter 2: Airbus Transport International – Aurélien Person – 28/11/2018
Comment # 2

Further to the issuance of PAD 18-152 applicable to A300-600 and A300-600ST, Airbus Transport International (ATI) has reviewed the impacts for its fleet of 5 A/C A300-600ST. You will find below the result of impact analysis:

Context:

The superseded AD 1998-040-012(b) R1 mandating SB A300-57-6062 has been performed on ATI fleet. ATI fleet has not been repaired in accordance with Airbus SB 300-57-6084.

New requirement of PAD 18-152:

The PAD 18-152 provides new inspection intervals for center section frame 40 forward fitting radius at tension bolt junction. Paragraph (1) of PAD is applicable to ATI fleet (A/C not repaired IAW SB 300-57-6084) and first inspection (threshold) has been done on the fleet. The intervals values are defined in table 3 of the PAD.

Considering the table 3 for an UT inspection method selected, the interval will be 2800FC or 6000FH (AFT greater or equal to 1.5).

Impacts:

- If we apply this interval on ATI fleet, there is one aircraft overdue (last inspection performed 6901 FC next due: 9701CY(6901+2800) current cycles: 10487CY): The inspection shall be performed at AD effective date.
- This inspection is usually performed during C-check (every 24 months) in order to protect our operation in case on finding.
- The finding rectification will require 200 MH which cannot be performed overnight or during an A-check.
- For operational reason, we cannot have an additional maintenance slot inside a C-check slot.



Proposal:

- In order to avoid any negative impact on our operation, ATI would like to have a grace period defined in the AD.
- This grace period shall be applicable for the threshold and interval inspections.
- The corresponding grace period with a C-check for ATI fleet is 18months and 1800CY (half time the current remaining-see note below) from the effective date of this AD.

Note: The current deadline of AD 1998-040-012(B) mandating SB A300-57-6062 for the affected A/C is 13801CY (remaining cycles 3314).

EASA response:

Comment partially agreed. See EASA answer to Comment # 1 above.

