



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-160

[Published on 21 November 2018 and officially closed for comments on 05 December 2018]

### Commenter 1: Scandinavian Airlines System – Anders Bergman Jansson – 29/11/2018

#### Comment # 1

When this Fan Blade Ultrasonic inspection program was first initiated by CFM56-7B S/B 72-1019, CFM56-7B S/B 72-1024 and AD 2018-0071 SAS didn't track the Fan Blades in our MMIS.

We therefore had to perform the inspection on all engines.

The current AD 2018-0211 and CFM56-7B S/B 72-1033 Rev. 02 require a repetitive inspection at intervals not exceeding 1600 FC.

When we perform the inspection we also do an inventory of the Fan Blades PN and SN.

For a lot of engines that has not yet been inducted to a shop visit, we found the original Fan Blades still installed.

We have now added each Fan Blade in our MMIS, with PN, SN, and when known, TSN and CSN.

As AD 2018-0211 is written we have to perform the repetitive inspections at intervals not exceeding 1600 FC, even if the Fan Blade CSN has not reached the threshold.

In the coming AD, superseding 2018-0211, and reducing the threshold to 17000 Fan Blade CSN, would it be possible to add a note to paragraph (1) like:

"If an affected Fan Blade has been inspected and the next repetitive inspection will become due before 17000 Fan Blade CSN, you are allowed to postpone the inspection to not later than 17000 Fan Blade CSN.

Example: Fan Blades were inspected, when the Fan Blades had 9999 CSN. Based on the requirement next inspection should then be performed at  $9999+1600=11599$  Fan Blade CSN. In this case next inspection could be postponed to no later than 17000 Fan Blade CSN".

#### EASA response:

**Comment noted: as a general rule, if a previous inspection has been recorded as compliance with an AD requirement, subsequent inspection must be accomplished within the interval(s) as specified in the AD. Viceversa, if an inspection, accomplished well before the initial threshold, has not been recorded as compliance with the AD, subsequent inspection, as required by the AD, may be accomplished before exceeding the threshold as identified in the AD for the initial inspection.**



*Note: a similar question was presented during the AD reading exercise, at the AD workshop hold on 20/21 November 2018. Events proceeding are available at this [link](#). Please refer to “Airworthiness Directive Reading Exercise 2018 - Reading of AD 2018-0093-E”.*

*To be also noted that the new AD will supersede AD 2018-0211, identifying new threshold for the initial inspection.*

*Finally, please note that EASA is not responsible for AD enforcement. National Aviation Authorities are in charge for that. You may also seek their advice.*

*No changes have been made to the revised PAD in response to this comment.*

## **Commenter 2: Solaseed Air Inc – Akinari Asahi – 07/12/2018**

### **Comment # 2**

CFM56-7B SB 72-1033 Rev.3 shows the compliance of repeat inspection as below:

1.A.(1)(d) Repeat the inspection as per this Service Bulletin every 1,600

Flight Cycles after the initial inspection.

**2 If the initial Fan Blade inspection was completed before 15,400 Flight Cycles Since New**, it is allowed to defer the first repeat inspection until the Fan Blades accumulate 17,000 Flight Cycles Since New.

I think this means 15,400 FC + 1,600 FC is almost 17,000 FC. However, EASA PAD 18-160 was not included that requirement.

For example, when the Initial inspection is performed at 14,500 FC, *initial repeat inspection* of **SB requirements** is until 17,000 Flight Cycles Since New and it means/allows to defer 2,500 cycles until first initial inspection, but *initial repeat inspection* of EASA PAD will be until 16,100 Flight Cycles Since New and it has never additional cycles.

We request to add the compliance requirements as shown in CFM56-7B SB 72-1033 Rev.3, 1.A.(1)(d),2 to new EASA AD(EASA PAD 18-160).

**EASA response:**

**See EASA response to comment #1**

