

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-015

[Published on 04 February 2019 and officially closed for comments on 18 February 2019]

Commenter 1: Cathay Pacific Airways Limited – Edie Abdul Kadir – 14/02/2019

Comment # 1

We received and reviewed PAD 19-015 - ATA 71 – Power Plant – Engine Air Inlet Cowl Acoustic Panels – Inspection / Repair / Replacement. Below are our comments about the PAD for your consideration:

A) Paragraph 1:

The PAD has two groups of Group 1 and Group 2, however there is no such aircraft group in Airbus SB A330-71-3024 rev 04. Creating new group in EASA AD may create confusion as it is not align with Airbus inspection SB content. To make it more simple, just put the effectivity to Nose Cowl P/N SJ30020, or P/N SJ30361 and there is no need to classify the aircraft to group 1 or 2. In fact it doesn't matter whether the a/c has been embodied terminating mod in production, because if we install those affected P/N on the aircraft, it has to perform inspection anyway.

B) The PAD uses the word DET inspection which is not align with Airbus SB A330-71-3024 rev 04. The wording DET inspection in Airbus definition is an intensive visual examination of a specific item, installation or assembly to detect damage, failure or irregularity with the help of proper lighting and cleaning. It is a visual inspection and has nothing to do with tap test inspection. We believe the proper wording is special DET (NDT method as described in the A330 Non-destructive Testing Manual - NTM), which is the correct term that Airbus use in the inspection SB. The usage of DET may create confusion and conflict with Airbus SB.

C) In the PAD para. Definition - Only Airbus SB A330-71-3030 is stated in the PAD for Modification SB. We want to request to add RR NMSB reference as well (similar to inspection SB wording), for example: " The modification SB: Airbus Service Bulletin (SB) A330-71-3030 , which refers for accomplishment instructions to Rolls Royce Non-Modification SB RB.211-71-H205 Revision 0". The reason is the modification of in-service Nose Cowl is needed to be done in the shop, and we don't refer to Airbus SB in the shop and just use RR NMSB.

D) In PAD para. 3 it says - Terminating Action: (3) Modification of an aeroplane in accordance with the instructions of the modification SB, constitutes terminating action for the repetitive inspections required by paragraphs (1) and (2), provided the aeroplane remains in that configuration.

The wording "provided the aeroplane remains in that configuration" can lead to another interpretation that we cannot intermix post mod Nose Cowl with pre-mod Nose Cowl on one aircraft if we want to terminate repeat inspection requirement. We suggest to remove this wording. As highlighted in

item (a), this is the reason why we don't agree with aircraft grouping by this PAD and suggest to use the effectivity on component level (Nose Cowl PN SJ30020 and SJ30361). We propose to use similar wording in previous AD 2011-0173R1 which is more clear to understand.

E) In PAD para. 1 for the repetitive inspection requirement, the PAD only make reference to Airbus SB A330-71-3024 and Rolls Royce Non-Modification SB RB.211-71-AG419 reference is missing.

Group 1 aeroplanes: Within the compliance times specified in the inspection SB, or within 6 months after the effective date of this AD, whichever occurs later, without exceeding 24 months since last DET (SB A330-71-3024 at any Revision), and, thereafter, at intervals not to exceed 12 months, accomplish a DET of each affected part on both engines of the aeroplane in accordance with the instructions of the inspection SB.

Please be aware this inspection not only will be done on-wing, but also off-wing in the shop. When performing the inspection in the shop, we will use RR NMSB to perform the work since it is off-wing task and Airbus SB is not appropriate for shop visit. If the AD only make reference to Airbus SB in AD para. 1 for repeat inspection, we will have difficulties to take credit for the previous inspection accomplished in the shop as per RR NMSB. Although Airbus SB does refer to NMSB, however it will lead to problem to show compliance for the shop inspection to the AD para 1 as it does not explicitly states NMSB as a compliance reference.

We would like to propose to add NMSB reference in AD para. 1 to avoid this problem as per below suggestion:

Within the compliance times specified in the inspection SB, or within 6 months after the effective date of this AD, whichever occurs later, without exceeding 24 months since last special DET (SB A330-71-3024 at any Revision or Rolls Royce Non-Modification SB RB.211-71-AG419 at any Revision).

EASA response:

- A. Comment not agreed. It has become EASA AD standard to create Groups when different aeroplane configurations exist for which different required actions also exist. In that specific case, Group 1 aeroplanes are subject to inspections in accordance with the Inspection SB. Group 2 aeroplanes are not subject to these inspections, unless a Group 2 aeroplane becomes a Group 1 by installing an affected part, as allowed by paragraph (5).**
- B. Comment agreed. DET has been corrected into special detailed inspection (SDI, tap test inspection method) in the Final AD.**
- C. Comment agreed. Reference to RR SB RB.211-71-H205 has been included in the Final AD.**
- D. Comment not agreed. The wording 'provided that....' refers to the fact that the terminating action statement is conditional and does not prevent or prohibit installation of an affected part on an aeroplane. See also EASA answer to point A. above.**
- E. Comment partially agreed. The AD is at aeroplane level, meaning that Airbus SBs are the main sources for accomplishing the required actions. The AD does not specify whether actions must be done on-wing, or at engine level (i.e. in-shop). The definition of 'inspection SB' already contains the reference to Rolls-Royce NMSB RB.211-71-AG419 Revision 3. In addition, reference to Rolls-Royce SB RB.211-71-H205 has been added to the definition of the 'modification SB' as stated in EASA answer to point C. above. Consequently, actions done in accordance with those RR (NM)SBs are acceptable for compliance.**



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

Commenter 2: Lufthansa Technik AG – Jann Rauschenberger – 15/02/2019

Comment # 2

During assessment of PAD 19-015 some questions came up regarding the proposed AD requirements.

A. Definitions: Serviceable Part

[...], or has passed inspection in accordance with the instructions of the inspection SB [...]

LHT Engineering understands that an air inlet cowl once has passed the inspection and is stored, is therefore also considered as serviceable even if the store time exceeds 12 month and also this cowl need not a reinspection prior to installation on an aeroplane. So the 12month inspection interval is seen as operating month. Please confirm that assumption.

B. Terminating Action: Paragraph (3)

EASA describes in this section that an aeroplane which is modified by modification SB A330-71-3030 has termination action for repetitive inspection required by this new EAD.

LHT Engineering would like to mention that an aeroplane that gets two in Shop modified Inlet cowl installed, should also be considered as not affected from this EAD. As this aeroplane would not get any modification according to the modification SB A330-71-3030. This should also be reflected in this section.

C. Part(s) installation: Paragraph (4)+(5)

A Group 2 aeroplane becomes a Group 1 aeroplane after installation of an affected part.

LHT understands that also a Group 1 aeroplane becomes a Group 2 aeroplane after installation of two not affected air inlet cowl and this will also terminate any repetitive inspections required by this EAD.

EASA response:

A. Comment not agreed. The calendar time of a component since the last inspection determines when the next inspection is due. The time spent on a shelf is therefore also relevant. If a part, having passed an inspection 1 month before removal from an aeroplane, is re-installed after having spent more than 11 months on the shelf, the next inspection is due before installation on an aeroplane. No changes have been made to the Final AD in response to this comment.



- B. Comment partially agreed. See EASA answer to Comment #1 point E.**
- C. Comment not agreed. The terminating action statement (§3) clearly specifies that, provided an aeroplane remains post-mod (i.e. Group 2), inspections are no longer required. In EASA view, this cannot be misunderstood. No changes have been made to the Final AD in response to this comment.**

Commenter 3: American Airlines – Rick Robertson – 16/02/2019

Comment # 3

AAL is submitting the following comment regarding the attached EASA PAD 19-015, A330-200 Trent 700 Inlet Cowl Acoustic Panels Insp-Repair: Service Bulletin Error in a “Required for Compliance” Step Needs to be Corrected in a Timely Manner to Prevent AMOCs:

Attached Airbus SB A330-71-3024 REV 04 dated December 17, 2018, has an incorrect circuit breaker callout in a “required for compliance” step.

Details:

Airbus SB A330-71-3024 REV 04, Task 713024-833-801-001 – Repair, contains the paragraph D. TEST testing procedure (which is not contained in SB rev 01). The test procedure is only applicable if the inlet cowl has been removed or replaced.

The paragraph D. TEST procedure is “Required for Compliance” per SB page 27 NOTE. The TEST section includes the step “Remove the safety clips and/or tags and close/unlock these circuit breakers:” and lists the circuit breakers required to close. The circuit breaker location for FADEC A ENG 2 is listed in the SB as 73 Q.

However, A330 AMM 24-53-00-00 CONF 00 rev 67 dated 01-JAN-2019 (circuit breaker ID) and A330 AMM 71-61-41-000-802-A & 71-61-41-400-802-A rev 67 dated 01-JAN-2019 (normal inlet cowl R&R) list the circuit breaker location for FADEC A ENG 2 as 74 Q.

This error also occurs in all the other parts of the bulletin where the FADEC A ENG 2 circuit breaker is listed.

Action Taken to Date:

AAL inquired of this error to Airbus in the attached Dossier 80567862, who acknowledged the error and agreed to correct this error at the next bulletin revision “not planned yet”. Airbus did not commit to a date for the next revision.

Request:

AAL requests these errors be addressed by the EASA AD, and requests the bulletin be corrected by Airbus soon as practicable.



AAL is concerned that airlines could be unduly burdened with an EASA AMOC or, eventually, an FAA AMOC request if this discrepancy is not at a minimum addressed by the EASA AD and, more appropriately, corrected by Airbus in a timely manner.

EASA response:

Comment agreed. Note 1 has been added to the Final AD that clarifies this point.

