

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-023

[Published on 14 February 2019 and officially closed for comments on 14 March 2019]

Commenter 1: Singapore Aero Engine Services – Wang Wenye – 22/02/2019

Comment # 1

We would like to raise a few questions regarding the subject mentioned PAD, as an engine MRO:

- A. There is some difference for in shop compliance between Rolls Royce SB AJ994 and the PAD. Strip detail of a Level 2 module 51 is subjected to the required workscope, this might not require the strip to expose the affected part for s/n verification. Based on Rolls Royce SB AJ994, Level 2 module does not need to be further stripped even if it contains an affected part. However, if we refer to PAD qualified shop visit definition, as long as a Level 2 M51 containing an affected part, we have to strip and replace the part. Do you agree that this is the difference? Shall we follow AD instruction for compliance?
- B. Scenario: Due to the possibility of records error, there might be a Level 2 module 51 containing an affected part, but the module serial number was not listed in the NMSB appendix 1. Shall MRO strip the module in order to confirm the s/n? Extract from AJ994 R1:

Replace the LP turbine rear support seal panel assembly in accordance with 3.A. Accomplishment Instructions, for the engines which are in-shop with a level 3 (Refurbishment) or above workscope, or are subject to a level 2 (Check and Repair) shop visit on the IP turbine module (Module 51) for a different reason and which have not had NMSB 72-AJ994 previously accomplished. A level 2 (Check and Repair) should not be carried out on the IP turbine module for the sole purpose of removing the LP turbine rear support seal panel assembly.

Extract from PAD:

Qualified shop visit: Level 3 shop visit (Refurbishment) of an engine equipped with an affected part, or Level 2 shop visit (Check and Repair) of a module 51 containing an affected part.

- C. Just to confirm that if the M51 is Level 1, we don't have to upgrade the module to replace the affected part, even if ESN or MSN is listed in appendix.

EASA response:

- A. Comment not agreed. There is no difference between the accomplishment instructions in Rolls Royce NMSB 72-AJ994 and the requirements of the AD. The instructions for compliance in the AD are mandatory and “stripping” a module 51 will be required during any Level 2 shop visit if the module contains an affected part. The decision to perform a module 51 Level 2 shop visit for the sole purpose of applying Rolls Royce NMSB 72-AJ994 is at the discretion of the engine owner/operator.**
- B. Comment noted. The affected parts are defined by the AD and have a serial number (s/n) as listed in Appendix 1 of the NMSB. If during a qualified shop visit, the LP turbine rear support seal panel assembly s/n cannot be confirmed from the module records, module “stripping” will be required to verify it.**
- C. Comment noted. The definition of a qualified shop visit in the AD does not refer to Level 1. The replacement of each affected part during a Level 1 shop visit is not required.**

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

Commenter 2: Delta Air Lines – Chris Culver – 01/03/2019

Comment # 2

Delta has the following comments regarding EASA PAD 19-023:

- A.** Per EASA PAD 19-023, a “Qualified shop visit” is defined as... “Level 3 shop visit (Refurbishment) of an engine equipped with an affected part, or Level 2 shop visit (Check and Repair) of a module 51 containing an affected part.” Delta would like the wording of the AD to include “Level 3 shop visit (Refurbishment) or above...”. Note that this “or above” wording is used in the RR NMSB 72-AJ994 when defining the shop visit level requirements. This is to align the AD language with the RR NMSB and ensure compliance for an engine being worked at a Level 4 shop visit.
- B.** Per EASA PAD 19-023, the “Parts Installation” section states “From the effective date of this AD, do not install an affected part on any engine”. Delta would like the wording to be changed to “From the effective date of this AD, do not install an affected part on any module.” Delta asks this since it would be possible for Module 51 to be swapped and installed on another engine prior to a qualified shop visit in which part replacement would occur.

EASA response:

- A. Comment agreed. The Final AD has been amended accordingly.**



B. Comment partially agreed. The module is an engine component, whereas the engine is the product to which the AD applies. As long as a module is not installed on an engine, e.g. held as spare, an AD cannot require (or prohibit) action on that module, except in relation to the installation of that module on an engine. If a module held as spare, or a module moved from one engine to another, has an affected part installed, then the PAD (§3) would effectively prohibit installation of that module (including affected part) on any engine.

However, in view of the comment, EASA has amended the Final AD, effectively allowing installation of a module having an affected part installed, as long as this module was not subject to a qualified shop visit.

Commenter 3: Lufthansa Technik AG – Rene Schinkel – 12/03/2019

Comment # 3

- A. Please update par. (2): Replacement of each affected part with a serviceable part on an engine or module 51, as applicable, accomplished before the effective date of this AD in accordance with the instructions of the original issue **or revision 1** of RR NMSB TRENT XWB 72-AJ994 is acceptable to comply with the requirements of paragraph (1) of this AD for that engine or module 51, as applicable.
- B. Par. (3) clarification is required: is it allowed to install an affected module to another engine (due to a module exchange in shop where the module is at level 1) or is it required to perform 72-AJ994 in this case (regardless of module workscope)? Please detail this information in the final AD.

EASA response:

- A. Comment not agreed. By definition of “the NMSB” in the AD, credit for actions done using revision 1 is given at the beginning of the RACT section of the AD: “Required as indicated, **unless accomplished previously**”. No changes have been made to the Final AD in response to this comment.**
- B. Comment agreed. Paragraph (3) has been amended accordingly. See also EASA answer to Comment #2, point B. above.**

