

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-062

[Published on 12 April 2019 and officially closed for comments on 26 April 2019]

Commenter 1: Emirates – Mohammed Radaideh – 14/04/2019

Comment # 1

Subject PAD/ AD applicability states;

Quote RB211 Trent 970-84, 972-84 and 972E-84 engines, all serial numbers (ESN), except those which have Rolls-Royce modification (mod) 72-AK047 embodied in production. ESN 91565 and higher have mod 72-AK047 embodied in production. **Unquote**

Please advise why only engines that have SB 72-AK047 in production are excluded?? What about engines that have ASB 72-AK047 embodied in-service. AD applicability should read “except engines which have SB 72-AK047 embodied”, regardless if SB 72-AK047 done in production or in-service.

EASA response:

Comment not agreed. An engine on which the (now) required modification has been embodied in-service through the SB can be recorded as ‘compliant’ with the AD modification requirement.

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

Commenter 2: All Nippon Airways – Hiroyuki Tanizaki – 25/04/2019

Comment # 2

Regarding to applicability, there is following sentence "ESN 91565 and higher have mod 72-AK047 embodied in production." but ANA has already received earlier ESN 91564 and those engines have already embodied 72-AK047.

Therefore, please remove "ESN 91565 and higher have mod 72-AK047 embodied in production." or amend to "RB211 Trent 970-84, 972-84 and 972E-84 engines, all serial numbers (ESN), except those which have Rolls-Royce modification (mod) 72-AK047 embodied in production or ESN 91565 and higher" in the applicability to match the latest 72-AK047 embodiment status.



EASA response:

Comment not agreed. If ESN 91564 had 74-AK047 embodied in-service (note that the SB applies only to ESN below 91565) through the SB, that means the AD applies, but has been ‘complied with’. See EASA answer to Comment #1 above.

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

Commenter 3: Lufthansa Technik – Detlev Dolata – 26/04/2019
Comment # 3

In general we are fine with the current version, and being pleased to see the SB RB211-72-AK047 adopted as part of closing action. Nonetheless we would like to raise a few thought in may improving the evaluation process of datum AD.

- A. In § “Applicability” it might be considerable to limit the exclusion not only to those which have embodied RB211-72-AK047 since production, as we see no difference in having it accomplished either at factory level or at operator. So please consider to expand the exclusion clause for all application variety of SB RB211-72-AK047
- B. In § “Reason” there is the RB211-72-AK047 mentioned as “allowed” to terminate required inspection as per RB211-71-AJ576 Rev02, but did not being referenced as terminating action for datum AD. Here we are facing the shall vs. should issue. A clear statement what is terminating action for what might be a better idea, such as SB RB211-72-AK047 is terminating the inspection requirement of SB RB211-71-AJ576 but did not terminates the AD, if that is the intention of EASA, anyway it should be stated crystal clear. Further if only the combination of accomplishment of 72-AK047 and 72-H499 as prerequisite of aforementioned AK047 constitutes terminating action for datum AD than it should be lined out at that same level of clarification.
- C. § “Terminating Action” (7), The para 5 left room for interpretation about the terminating action for datum AD, as RB211-72-AK047 terminates only the inspection requirement as per RB211-71-AJ576, hence the terminating action for the AD is as per para 5 not clearly defined.
- D. § “Modification” (5) the intended time line of 16 month might become a problem for some operator operating a bigger fleet, as RR is currently limiting the part supply up to 3ea kit at a time and staggering it on monthly basis. This constitutes another burden as operator cannot get one tail sign done at once. It needs to call the A/C into the hangar for a second time for modification of the last remaining engine. Therefore larger fleet operator may run into time constraints to comply with the 16 month. Hence it might be considerable either delaying the publishing process of AD until RR confirms being able to supply required parts at sufficient order level or implementing a grace period taking the bottle neck issue of RR into account.



EASA response:

- A. Comment not agreed. See EASA answers to Comments #1 and #2 above.**
- B. Comment agreed. The Final AD has been amended to improve clarity.**
- C. Comment not agreed. Paragraph (5) requires the modification, while § (7) confirms that, after modification on an engine (as per §5), the inspections of §(1) per NMSB 71-AJ576 are no longer required. In EASA view, this is as clear as we can define it.**
- D. Comment not agreed. The risk assessment outcome does not support any longer reaction time. Upon request, Rolls-Royce has confirmed its commitment to production of the new breather mast, introduced by 72-AK047, at a rate in line with the requirements of the AD and will also work with operators to maximise the opportunity to embody SB 72-H499 (and hence SB 79-H640) on engines at shop visit to minimise the maintenance burden associated with embodying this modification on wing.**

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

Commenter 4: Qantas Airways – Bruce Russell – 29/04/2019
Comment # 4

Feed-back for the proposed T900 Engine Breather Drains Mast Assembly AD are as follows:

- A. Concurrent Requirement (6):**
- SB 79-H640 should be the primary reference for concurrent requirements within PAD 19-062, **as the changes necessary prior to the incorporation of SB 72-AK047 are performed by SB 79-H640.**
- B. Compliance Time (1):** Within table 1, QFA fall into group 2 of 24 Months from the 12 Sept. 2018.
- With the concurrent requirement of completing SB RB211-79-H640 (which is best accomplished off-wing and during SV) and the limited part supply of the improved Breather Drains Mast P/N KH83453, a realistic completion of this AD within the remaining 16 Months is definitely compromised.
- QFA would like to see a compliance time extended to align with the natural attrition of an engine shop visit for incorporation of SB 79-H640. This would extend compliance time to Sept. 2021. As a late comment [received EASA 7/5/2019], ordering of the tooling requirements listed in SB 72-AK047 has shown that a lead-time of 4 months is needed. This would further support the need to reconsider the AD compliance time.

EASA response:

- A. Comment agreed. NMSB 72-AK047 refers to SB 72-H499, which in turn refers to 79-H640 as a concurrent requirement. The reference to SB 79-H640 was inadvertently not included in the PAD as concurrent requirement. The Final AD has been amended accordingly.**
- B. Comment not agreed. See EASA answer to point D of Comment #3 above. No changes have been made to the Final AD in response to this comment.**

