

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-095

[Published on 25 May 2019 and officially closed for comments on 24 June 2019]

Commenter 1: Lufthansa Technik AG – Armin Bayer – 27/05/2019

Comment # 1

The compliance time in REF PAD “table 1” states “Within 24 months after aeroplane first flight, or after last accomplishment of MPD task 05-21-90-210-801-A, as applicable”. [MPD task] 05-21-90-210-801-A [is] the AMM reference linked to MPD task ZL-191-00001-01.

We kindly ask for clarification/correction.

EASA response:

Comment agreed. The MPD reference no. is 052190-210-801 and MPD task no. is ZL-191-00001-01. AMM task is 05-21-90-210-801-A. They are all connected.

The Final AD has been amended accordingly for clarification.

Commenter 2: Emirates – Adil Simou – 28/05/2019

Comment # 2

A. (Compliance Time)

Within the compliance (A or B) whichever occurs Later, and, thereafter, at intervals not to exceed 24 months, accomplish a DET of each affected part IAW SB A380-53-8163.

A - Within 24 months after aeroplane first flight, or after last accomplishment of MPD task 05-21-90-210-801-A, as applicable

B - Within 6 months after the effective date of this AD.

SB 53-8163 inspection interval (24 months) is not in line with Emirates Heavy maintenance input, Emirates would appreciate if the interval is increased to 36 months. Note: Emirates C check interval was increased from 24 months to 36 months.

B. (Terminating Action)

- Production Installation of Titanium Profiles at FR40, STG1 is per Mod 75498 (217 and subsequent) & Mod 77715 (162 & 167).
- In Service installation of Titanium Profiles at FR40, STG1 will be accomplished per SB A380-53-8166 & A380-53-8170 (SBs expected for 2019).

Emirates understanding is that any A/C with Titanium Profiles at FR40, STG1 will be considered as post Mod and therefore should not be re-inspected per SB A380-53-8163. Emirates would appreciate if AD (related to PAD 19-095) will make reference to Terminating action per SB A380-53-8166 & A380-53-8170 (as applicable).

EASA response:

A. Comment not agreed. The risk assessment outcome indicates that an interval of more than 24 months cannot be supported.

B. Comment partially agreed. It is expected that, once the two modification SB are issued, the AD will be revised to introduce as optional terminating action.

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

Commenter 3: Air France – Gueraud Gwenaël – 28/05/2019

Comment # 3

Could you integrate MSB 53-8166 and 53-8170 as terminate action of ISB 53-8163 in the step Terminate action of the PAD in object?

As stipulate in TFU 53.35.00.026.

EASA response:

Comment partially agreed. See EASA answer to Comment #2, point B, above.

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



Commenter 4: British Airways – Philip Bourke – 03/06/2019**Comment # 4**

British Airways respectfully request that EASA also consider MPD Task Number 533500-00507-01 as an existing valid inspection to find corrosion on Frame 40, at Stringer 1. MPD Inspection 533500-00507-01 is a Corrosion Prevention and Control Programme (CPCP) inspection, with an interval of 72 months and removes most of the wing-to-body fairing panels, including the same panels 191BB, 191DB, 192BB and 192DB noted in SB A380-53-8163. Furthermore British Airways have recent experience of finding corrosion at the subject location, while doing MPD 533500-00507-01 inspection as noted below:

- 1) MSN 095 corrosion found on the 6 year check and repaired per TD/80282997/020/2018#A and approved by RDAS 80282997/015/2018 Issue A. (attached)
- 2) MSN 121 corrosion found on the 6 year check. Corrosion was removed and found to be within SRM limits. Note SRM revision 58 dated December 2018 was used. (attached)
- 3) MSN 124 corrosion found on 6 year check and repaired per TD/80344357/042/2019#A and approved by RDAS 80344357/035/2019 Issue A. (attached)

For information only, BA have also found and rectified corrosion at frame 72 while doing this inspection.

If EASA are unwilling to accept MPD Task 533500-00507-01 as a valid inspection, BA request that the 2 year threshold for re-inspection be counted from the above rectification on MSN's 095, 121 and 124.

EASA response:

Comment partially agreed. For the inspection referred to by the commenter, MPD task 533500-00507-01, panels to be removed include the ones that need to be removed for the ISB. Strictly speaking, this task is not aimed to check the whole Frame 40 nor Stringer 1 but just around the attachments. However, even it does not cover exactly the same perimeter, MPD inspection task 533500-00507-01 may be acceptable as an alternative to AMM 05-21-90-210-801-A, since due to removal of panels, corrosion (if any) will be detected. For consistency, task 533500-00501-01 that is the same inspection but affecting MSN in pre-MOD 71525 configuration, may also be an acceptable alternative.

However, as there are some concerns linked to possible discrepancies on the inspection area between the ISB and inspection task 533500-00507-01 / 533500-00501-01, individual applications for instructions can be made to Airbus, on a case-by-case basis, to ensure an adequate level of safety is maintained.

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



Commenter 5: Qatar Airways – Vitto Paolo Barrera Sarceno – 29/06/2019**Comment # 5**

We were reviewing PAD 19-095 and the following are QTR comments:

- A. In Paragraph (1), we believe that the MPD task number should be ZL-191-00001-01 and not 05-21-90-210-801-A.
- B. The PAD reflects Applicable SRM repair which lists SRM chapters that are inactive and superseded since 01 June 2018. We suggest to re-phrase to “Affected SRM Repair” instead of Applicable SRM repair, to avoid confusion.
- C. We suggest to re-phrase Paragraph (5) to avoid confusion: “From the effective date of this AD, it is NOT allowed to accomplish an Affected SRM repair, as defined in this AD.”

EASA response:

- A. Comment agreed. See EASA answer to Comment #1 above.**
- B. Comment agreed. The Final AD has been amended accordingly.**
- C. Comment agreed. The Final AD has been amended accordingly.**

