

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-119

[Published on 09 July 2019 and officially closed for comments on 23 July 2019]

Commenter 1: Air France – Mickaël Gorka – 11/07/2019

Comment # 1

There is no information if lock washer tab is found locked.

Make sense that no further action is required but AFR thinks, it will be interesting to add a sentence in this case.

EASA response: Not agreed. Paragraph (1) calls for inspections, and it follows that there is no further action required in case of no findings.

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

Commenter 2: Lufthansa Technik – Thorsten Koch – 12/07/2019

Comment # 2

- Applicability: It is recommended that EASA explicitly mentions the affected MSNs (instead of referring to the AOT applicability)

EASA response: Not agreed. As AOT is issued under privileges of the DOA (see Definitions in the AD), EASA uses in many cases the AOT Applicability.

- Reason: The PAD “requires repetitive detailed inspections (DET)”. However, the AOT is a one-time inspection for correct installation of the tab washer. Only in case of findings during this one-time inspection, repetitive inspections are required until the (potentially) deferred final corrective action has been accomplished. We recommend the wording “requires detailed inspection (DET)”.

EASA response: Agreed. Wording would be: “For the reasons described above, this AD requires detailed inspections (DET) of MLG FPB nuts and lock washer tabs, left-hand (LH) and right-hand (RH) sides, and, depending on findings, accomplishment of applicable repetitive DET or corrective action(s).”



- Inspection (1): We recommend to change the wording from “of the lock washer tabs of the MLG FPB nuts, LH and RH sides” to “of the MLG FPB nut and lock washer at the forward face of the Trunnion block, LH and RH sides”, to be in line with the AOT wording.

EASA response: Agreed.

- Inspection (1): This paragraph must state that, if the tab washer is found correctly installed during initial inspection, no further action is required on that trunnion block for compliance with this AD.

EASA response: Not agreed. See answer to comment 1

- Marking(s) or Corrective Action(s) (2): We recommend to explicitly mention the unacceptable condition. Instead of “and without another discrepancy found (as defined in the AOT)” use “without any visible sign of any FPB nut rotation or of any FPB axial migration, before next flight...”.

EASA response: Not agreed. Chapter 4.2.2 b of the AOT specify the word « discrepancy » whatever that is as described in the AOT. This is standard practice for AD writing process.

- Marking(s) or Corrective Action(s) (2.2) and Terminating Action (7): The current wording of the PAD Para. 2.2 and 7 does not recognize the application of corrective actions before next flight (Para 2.2) as a terminating action for the inspection requirement Para (3). The correct wording of para (7) must be: “Accomplishment of corrective action(s) on one or both MLG FPB on an aeroplane, as required by paragraph (2.2) or (4) or (5) or (6) of this AD, as applicable, constitutes terminating action for the repetitive inspections as required by paragraph (3) of this AD for the affected MLG FPB (LH and/or RH side) on that aeroplane.” As an alternative, Para 2.2 must state that, if the corrective actions have been applied in accordance with the AOT, no further action is required on that trunnion block for compliance with this AD.

EASA response: Not agreed. Paragraph (2.2) and (4) are corrective actions applied before the repetitive inspection so cannot qualify as terminating action.

- Corrective Action (4) and Terminating Action (7): The current wording of the PAD Para. 4 and 7 does not recognize the application of corrective actions before next flight (Para 4) as a terminating action for the inspection requirement Para (3). The correct wording of para (7) must be: “Accomplishment of corrective action(s) on one or both MLG FPB on an aeroplane, as required by paragraph (2.2) or (4) or (5) or (6) of this AD, as applicable, constitutes terminating action for the repetitive inspections as required by paragraph (3) of this AD for the affected MLG FPB (LH and/or RH side) on that aeroplane.” As an alternative, Para 4 must state that, if the corrective actions have been applied in accordance with the Airbus instructions, no further action is required on that trunnion block for compliance with this AD.



EASA response: Not agreed. Paragraph (2.2) and (4) are corrective actions applied before the repetitive inspection so cannot qualify as terminating action.

- Repetitive Inspection (3): The relevant AOT paragraph 4.2.2.d requires DET of the witness mark (nut rotation) AND detailed inspection for gaps and sealant condition (FPB axial migration). The current PAD paragraph (3) wording mandates the inspection for nut rotation only. The correct requirement would be “accomplish a DET of the witness mark applied to MLG FPB nut, LH and/or RH side, as applicable, to detect nut rotation in accordance with the instructions of the AOT, and a DET for gap or damage to the sealant bead at the FPB assembly to trunnion block aft face in accordance with the instructions of the AOT.”

EASA response: Agreed. Text changed as follows : “ accomplish a DET to MLG FPB nut, LH and/or RH side, as applicable, to detect nut rotation and, gap or damage to bearing sealant bead “

- Corrective Action (5): The AOT defines as unacceptable discrepancies “axial migration of the bearing assembly or rotation of the nut” for any inspection (see AOT paragraphs 4.2.2 b and d). Para (5) must therefore read “any visible sign of any FPB nut rotation or of any FPB axial migration , LH and/or RH side, before next flight,…”

EASA response: Agreed. For a better understanding of the AOT description, text to be amended in para (5) as follows: “ any visible sign of any FPB nut rotation or of any FPB axial migration, LH and/or RH side, before next flight ...”

- Corrective Action (4): We recommend to explicitly mention the unacceptable condition. Instead of “and with another discrepancy found (as defined in the AOT)” use “any visible sign of any FPB nut rotation or of any FPB axial migration, before next flight...”

EASA response: Agreed. The amended text would be: “any visible sign of any FPB nut rotation or bearing migration finding ...”.

EASA response:

We have amended the Final AD accordingly.

Commenter 3: Delta Air Lines – Kimberly Davis – 12/07/2019

Comment # 3



References:

/A/ PAD 19-119, published on EASA 09 July 2019.

/B/ Airbus A350 AOT A57P013-19 rev 00.

SUMMARY:

PAD 19-119 proposes to call for inspections of the A350 MLG Pintle Bearing Lock Washer for engagement of fold over lock washer tab and potential rotation if the locking tab is not engaged. Delta concurs with the proposed Proposal to issue an Airworthiness Directives (PAD). In support of this PAD, Delta would like to provide the following small comments.

While Delta Air Lines does not technically operate under EASA rules, we see several benefits in participating in EASA rulemaking process. For Airbus Service Bulletins, the EASA PAD and AD language often becomes the framework for the FAA NPRM and AD. Also, the industry hoped for improvement are increased with greater participation in the coordination and review process.

DELTA'S COMMENTS:

1. Delta notices that paragraph 4.2.3.ii.B2 of the AOT refers to a revision to the AOT in the near term. Delta appreciates that EASA PAD includes the language that the use of a later revision of the AOT would be acceptable for compliance.

EASA response: Not agreed. Any EASA AD contains in the Ref. Publication section the standard phrase: “The use of later approved revisions of the above-mentioned document is acceptable for compliance with the requirements of this AD. ”

2. Paragraph (7) in the EASA PAD states “Accomplishment of corrective action(s) on one or both MLG FPB on an aeroplane, as required by paragraph (5) or (6) of this AD, as applicable, . . .” This implies that operators may accomplish the corrective action after either visible signs of rotation (paragraph (5)), or after applying torque stripes (paragraph (6)). However, paragraph (2) of the EASA PAD allows accomplishing corrective action directly after inspection, ie without requiring the intermediate step of applying torque stripe. Delta has upcoming C-check visits and is hoping to inspect and correct at those hangar visits. Delta believes that paragraph (6) of the PAD should state “Following accomplishment of any inspection per paragraph (1) or (3) of this AD on LH and/or RH side . . .”. This will allow operators to correct directly after the inspection, without requiring an intermediate step of applying the torque stripe between inspection and corrective action.

EASA response: Not agreed. Paragraph (2.2) and (4) are corrective action applied before repetitive inspection so no further action is required.

CONCLUSIONS:

Delta agrees with the proposed PAD, and submits the above comments to help improve the AD process, provide clarification, and reduce unnecessary AMOC requests.



EASA response: Please see above.

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

Commenter 4: Cathay Pacific Airways – Jimmy Cheng– 16/07/2019

Comment # 4

1PAD Paragraph 1 requires the accomplishment of DET of the lock washer tabs in accordance with AOT, where AOT A57P013-19 REV 00 Paragraph (a) requires a Visual Inspection per NDT A350-A-51-99-XX-01001-040A-A – Visual, with a statement in the AOT:

“Through this AOT, it is required to perform a Detailed Inspection (DET) as follows on the Left Hand and the Right Hand wing:”

Where both AOT A57P013-19 REV 00 Paragraph (b) and (d) request DET inspection, and the latter also referencing NDT A350-A-51-99-XX-01001-040A-A – Visual.

CPA understands that the intent is to perform DET inspection per NDT A350-A-51-99-XX-01001-040A-A – Visual, however, AOT A57P013-19 REV 00 is confusing, as different terms are used to request for the same inspection task, and PAD also request for a DET rather than Visual Inspection.

CPA would therefore like to clarify that Visual Inspection per NDT A350-A-51-99-XX-01001-040A-A – Visual is sufficient to comply with the PAD requirements of DET?

Also, it would reduce conflicts of information if PAD paragraph 1 request for DET/Visual Inspection per AOT A57P013-19 REV 00 instead of just DET.

EASA response: Comment noted.

EASA response:

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

