

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-136

[Published on 23 July 2019 and officially closed for comments on 20 August 2019]

### Commenter 1: Singapore Aero Engine Services – Abdul Malek Bin Abdul Aziz – 06/08/2019

#### Comment # 1

Kindly refer below for our feedback to PAD 19-136:

- A. SB 72-J395 is a replacement of the HPIP bearing support with a new HPIP bearing support. We believe that the word 'rework' should be changed to 'replacement' or another description that is more suitable.

**The SB:** Rolls-Royce Trent 900 SB RB.211-72-J589 Revision 1 (modification), or SB RB.211-72-J395  
(rework).

- B. Can the qualified shop visit include Module 51 L2 rework level & above and check & repair? We have been receiving engines with M51 Level 2 rework requiring the SB to be accomplished even though the Module is not in for refurbishment or overhaul or engine refurbishment.

**Qualified shop visit:** Scheduled shop visit for M51 - IPT Module rework level of Module Refurbishment, or Module Overhaul, or Engine Refurbishment.

#### EASA response:

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

- B. *Comment noted. The definition of 'qualified shop visit' in the AD functions as a 'minimum' level shop visit. To accomplish the AD-required actions during any higher level shop visit is always allowed. No changes have been made to the Final AD in response to this comment.*

### Commenter 2: Qantas Airways – Bruce Russell – 06/08/2019

#### Comment # 2



- A. Rather than a Rolls-Royce EHM notification to mandate an inspection of the Seal Rings, QFA would much prefer a further reduced life of the seal rings to avoid the EHM Alert process. Issues with the EHM notifications:
- The EHM service alerts are very difficult to manage in an operational environment.
  - Visibility of out-of-hours EHM alert notifications are not discernible from other EHM notifications, especially on mobile devices.
  - The alerts can only be assigned via a manual process after the alert is received from Rolls-Royce (not monitored 24/7). The alert needs to be bannered in the subject field (AD APPLIES – as the first words)
  - Compliance to perform the EHM notification inspection of “before Next Flight” needs clarification depending on when the EHM alert is received. If the alert was received during A/C taxi or take off roll, should the aircraft be brought back to the terminal? If in flight should the aircraft be diverted? We need a suitable reaction time to enable this to be managed.

For consistency, the EASA AD inspection needs to be formatted to follow EASA AD 2018-0126 format, which includes the EHM alert notification wording, as example that follows:

Note 1: RR Operational Service Desk (OSD) automatically receives, monitors and analyses EHM data, and will send a notification containing the wording as shown in Figure 1 of this AD. The RR OSD will close out the alert when confirmation is received from the operator that the actions required in paragraph (1.1) of this AD have been carried out by the operator.

Figure 1 – Alert Notification

This alert is the subject of an EASA AD, and inspection of the LPT ISS may be required.

- B. Additionally, the current Rolls-Royce TLM TASK 05-20-01-800-801 states a Seal Ring Life limit of 3800 cycles for SB 72-J395 config (HP/IP Support P/N KH58088). This conflicts with the EASA AD limit of 3300 cycles.

**EASA response:**

- A. Comment noted and partially agreed. The use of the EHM (or not) is at operator’s discretion. If that Rolls-Royce service is not appreciated, this should be addressed to Rolls-Royce. For operators not using EHM, paragraph (3) applies, with a fixed (do-not-exceed) 100 FC inspection interval. The Final AD has been amended to include an ‘example’ EHM Alert in Appendix 1.**
- B. Comment not agreed. The AD clearly indicates that it “reduces the replacement interval for affected parts on Group 2 engines”. However, this reduced limit applies only to pre-mod/SB (72-J395 or 72-J589) engines. Seal rings installed on post-SB 72-J395 HP/IP Support P/N KH58088 are not affected – not in AD definition of ‘affected parts’. No changes have been made to the Final AD in response to this comment.**



**Commenter 3: Lufthansa Technik – Rene Schinkel – 16/08/2019****Comment # 3**

- A. The SB: 72-J589 is for rework and 72-J395 is for new parts (mod), please correct.
- B. Serviceable part: “An affected part that is new (not previously installed); or an affected part that has not exceeded the applicable life limit as specified in Table 1 of this AD **and that, before installation, passed an inspection (no defects found) in accordance with the instructions of the NMSB.**” Parts can only be installed in shop to an engine. However there are no shop inspections required/detailed in the NMSB. What inspection has to be done then? Please detail. Or is it meant that before engine installation that has an affected part installed the on-wing section of the NMSB has to be performed? Please clarify and update accordingly. In addition please note that engine shops are not able to work iaw AMM, as they do not have these maintenance data available and therefore (without revision of the NMSB) it is not possible to do this inspection in the shop.
- C. “For the reasons described above, this AD partially retains the requirements of EASA AD 201**9**-0199,” please correct to 201**8**-0199.
- D. Section 6 terminating action: please add a note that repetitive inspections iaw TLM section 05-20 (AD 2018-0048) must still be performed.

**EASA response:**

- A. Comment agreed. See EASA answer to Comment #1 point A. above.**
- B. Comment agreed. The Final AD has been corrected to remove the pre-installation inspection, as well as delete the inadvertently introduced reference to used parts – in-shop, only new parts are installed as replacement. Since replacement can only be accomplished in-shop, the wording of paragraph (4) has been amended accordingly.**
- C. Comment agreed. The Final AD has been corrected accordingly.**
- D. Comment partially agreed. Unless a specific reference to any other AD (requirements) is included, it should be clear that all actions required by other ADs remain required.**

