

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-152

[Published on 02 August 2019 and officially closed for comments on 30 August 2019]

Commenter 1: Air France – Matthieu Papin – 28/08/2019

Comment # 1

- A. The P/Ns shown in Table 1 (Affected parts P/Ns) are administrative P/Ns only, not physical PN that we can read on a part. They correspond to the kit of cascades comprising all the cascades of a half thrust reverser. SB L70DR78-054 applies to the blank-off cascade PN ATL0111-03-0 only (no other cascade is affected) which is re-identified into ATL0111-04-0. If a cascade needs to be replaced, the operator will change that cascade only and not the all set of cascades.
- B. The modification per SB A380-78-8015 and SB L70DR78-054 affects the blank-off cascades (LRUs) and the aft frame (non LRU) of the TR. Therefore the modification applies to the TR and not only to the cascade assemblies. The aft frame assies are re-identified with new P/Ns ATL1780-00-0 and ATL1790-00-0.
- C. Following points (statements) A and B above, the « Affected part » definition should be extended to the Aft Frame Assy, and the P/N list should be extended to the individual P/Ns ATLxxx of blank-off cascade and aft frame assy.
- D. §(1) (Inspection) applies to « affected TR » which is fine. §(3) (Modification) applies to « affected parts and the blank-off / aft frame junction of LH and RH nacelles » which should be simplified in « affected TR » as explained in B above.
- E. §(1) (Inspection) and §(3) (Modification) have the same compliance time. This lets the possibility to do the inspection and the modification at two different times within that compliance time. AFR would like to highlight that although SB A380-78-8014 and A380-78-8015 do not have concurrent requirements, SB L70DR78-057 and L70DR78-054 are concurrent requirements of one another, which means that they have to be performed at the same time. If EASA confirms the possibility to do the inspection and the modification separately, then no change is required. If EASA agrees that both inspection and modification must be carried out at the same time, then §(1) and (3) should be modified.
- F. (this comment may be adapted if both inspection and modification SB must be done concurrently, refer to E above): §(4) and (5) (Part(s) Installation are confusing. As it is written, the AD allows, after expiry of the compliance time, the installation of a PRE MOD TR (with Aft frame assy not modified) with modified cascades. AFR suggests the following changes:
 - §(4) No change



- §(5) After expiry of the compliance time of paragraph (3) of this AD, do not install an affected TR on any aeroplane unless, prior to installation, the affected TR is modified in accordance with the modification SB.
- §(6) After expiry of the compliance time of paragraph (3) of this AD, do not install an affected part on any aeroplane. (Note : the definition of the Affected part should correspond to comment 1).

EASA response:**A. Comment agreed.****B. Comment agreed.****C. Comment agreed. The AD has been amended accordingly.****D. Comment agreed. The AD has been amended accordingly.****E. Comment noted.****F. Comment agreed. The AD has been amended accordingly.****Commenter 2: Qatar Airways – SuanPhat Foo – 04/09/2019****Comment # 2**

QTR is reviewing the PAD 19-152 and would like to suggest several improvement/changes to the current PAD requirements. We note that the comment period has been closed but would very much appreciate if EASA can accommodate our comment/suggestion regarding this PAD.

QTR suggestions:

Definitions:

TR Affected by Inspection: GP7200 left half thrust reversers (TR), having Part Number (P/N) L78DR130000400, P/N L78DR130000500, or P/N L78DR130000600, and right half TR, having P/N L78DR230000400, P/N L78DR230000500, or P/N L78DR230000600; and having a serial number (s/n) as identified in SAFRAN Nacelles Service Bulletin (SB) L70DR78-057.

TR Affected by Modification: GP7200 left half thrust reversers (TR), having Part Number (P/N) L78DR130000400, P/N L78DR130000500, or P/N L78DR130000600, and right half TR, having P/N L78DR230000400, P/N L78DR230000500, or P/N L78DR230000600; and having a serial number (s/n) as identified in SAFRAN Nacelles Service Bulletin (SB) L70DR78-054.

Affected part: All A380-861 TR cascade assemblies, having a P/N as listed in Table 1 of this AD



Required Action(s) and Compliance Time(s):

Delete Table 1 – Affected parts P/Ns

Part(s) Installation:

(4) After expiry of the compliance time of paragraph (1) of this AD, do not install ~~an affected TR~~ any TR affected by the inspection SB on any aeroplane, unless, prior to installation, the affected TR passed a DET (no discrepancy detected) or, depending on findings, was corrected in accordance with the instructions of the inspection SB.

~~(5) After expiry of the compliance time of paragraph (3) of this AD, do not install an affected part on any aeroplane.~~

(5) After expiry of the compliance time of paragraph (3) of this AD, do not install any TR affected by the modification SB on any aeroplane, unless, prior to installation, the affected TR has been modified in accordance with the instructions of the inspection SB

Kindly find below excerpt of inspection & modification VSB which shows different Thrust Reverser (TR) Serial Number (SN) effectivity.

Excerpt from VSB L70DR78-057 (inspection):

Left Hand Thrust Reverser	
Part Number	Serial Number
L78DR130000400 L78DR130000500 L78DR130000600	TR02011 to TR02272 and TR02277

Right Hand Thrust Reverser	
Part Number	Serial Number
L78DR230000400 L78DR230000500 L78DR230000600	TR02011 to TR02272 and TR02277

Except from VSB L70DR78-054 (modification):

Left Half Thrust Reverser	
Part Number	Serial Number
L78DR130000400 L78DR130000500 L78DR130000600	TR02011 to TR02277

Right Half Thrust Reverser	
Part Number	Serial Number
L78DR230000400 L78DR230000500 L78DR230000600	TR02011 to TR02277

EASA response:

Comments agreed. The Final AD has been amended accordingly.

