

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-157

[Published on 15 August 2019 and officially closed for comments on 29 August 2019]

Commenter 1: Hong Kong Airlines – Robin Zheng – 20/08/2019

Comment # 1

Refer to captioned PAD, the effectivity is engine, it does not consider the outer ring replacement with new. In case there is an inspection finding and engine/OGV outer ring is rejected, and then a NEW outer ring is fitted during shop visit as a part of “corrective action”, should this engine be first inspected in 2000FC since the ring replacement, and subsequently repeat at 1000FC interval?

EASA response:

Comment not agreed. The intention is to track the inspection at engine serial number level, so if a new OGV is fitted, it would continue to be inspected at the 1,000 cycles interval. Only the initial inspection of an engine will happen before/upon 2,000 cycles, followed by 1,000 cycle repeat inspections, regardless of whether a new or original OGV is fitted.

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

Commenter 2: Delta Air Lines – Heidi Lee – 28/08/2019

Comment # 2

EASA PAD 19-157 instructs the inspection of the Trent XWB front engine mount support structure per Rolls-Royce Alert Non-Modification Service Bulletin (NMSB) Trent XWB 72-AK188. The Corrective Action(s) paragraph (2) and (3) instructs the replacement of the OGV outer mount ring assembly in accordance with the instructions of section 3.A (on-wing) or section 3.B (in-shop) of the NMSB. NMSB 72-AK188 only contains the damage acceptance/rejection criteria for the OGV outer mount ring assembly. It does not contain the replacement instruction of the OGV outer mount ring. Furthermore, there is no replacement instruction of the OGV outer mount ring in the AMM. If the OGV mount ring is found damaged beyond the limit

in the NMSB, the engine will be removed per the AMM. Therefore, DAL requests the AD language to change to “...before next flight, or before release to service of the engine, as applicable, replace the engine or the OGV outer mount ring assembly per the applicable AMM or EM tasks.”

EASA response:

Comment agreed. The Final AD has been amended to remove reference to the NMSB instructions when related to replacement of OGV mount ring. Any method approved/accepted by the State of Registry of the aircraft on which the engine is (to be) installed would be appropriate.

