

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-196

**[Published on 04 November 2019 and officially closed for comments on 02 December 2019]**

### **Commenter 1: Delta Air Lines – Richard Smith – 02/12/2019**

#### **Comment # 1**

##### **Reference:**

[A] EASA Proposed Airworthiness Directive: PAD No. 19-196, dated 04 November 2019

[B] CFM SB CFM56-7B 72-1054

[C] CFM SB CFM56-5B 72-0952

[D] Advisory Circular 20-176A

##### **SUMMARY:**

The Reference [A] proposed CFM56 AD would require operators to remove the affected HPT Inner Stationary Seal at next shop visit and inspect the affected seal in accordance with the instructions of the applicable SB. After removing the affected HPT Inner Stationary Seal, inspect the honeycomb and if separation is found do the following:

- i. Replace the affected seal with a not affected one.
- ii. Remove and replace the HPT Front Seal
- iii. Inspect HPT blades internal cavity for honeycomb debris and if found remove blade from service.
- iv. Remove from service the No. 3 ball bearing.

##### **DELTA'S COMMENTS**

Delta has been made aware of impending changes by CFM to Reference [B] and [C] and have viewed the Revision 1 drafts. Prior to the release of the AD, Delta recommends incorporating these changes.



Paragraph [1] states ‘inspect the affected seal in accordance with the instructions of the applicable SB’. Delta requests that EASA urge CFM to incorporate Required for Compliance(RC) steps into both Reference [B] and [C] for the purpose of, “distinguishing which steps in a SB will have a direct effect on detecting, preventing, resolving, or eliminating the unsafe condition identified in an AD.”

References [B] and [C] contain reporting requirements to CFM within the Accomplishment Instructions. Delta recommends that these steps not be RC because it is not related to the unsafe condition.

References [B] and [C] state to inspect the internal cavities of the HPT blades for honeycomb debris. The HPT rotor blade collects various types of debris over its life in service. Attempting to determine if the debris is precisely honeycomb material based upon a general visual check is subjective and open to interpretation. Delta recommends the option to either discard the blade set or to send blade set to an approved source for overhaul in lieu of this requirement.

Engine Shop Visit is defined in the ‘Definitions’ section of Reference [A]. Delta recommends this be defined by CFM and included in References [B] and [C].

***EASA response:***

***Comment noted. Comments have been shared with CFM International for review and possible implementation in the applicable SB. To be noted that later SB revisions are acceptable for compliance with the requirements of the AD. PAD has been revised adding reference to the revised SBs.***

