

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-196R1

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Commenter 1: KP Aviation – Raul Lopez – 01/02/2020

Comment # 1

After evaluation of subject PAD I would like to request clarifications regarding the following points:

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

1. Paragraph (2) Corrective Action(s)

a. Subparagraph (2.1) Replace the affected seal with a not affected one (see Note 1 of this AD).

i. [Q1] What is the final disposition for the replaced part? Can the part affected be repaired per approved OEM manual (repair 003) and release to service again?

b. Subparagraph (2.2) Replace the rotating air HPT front seal with a serviceable one.

i. [Q1] What is the final disposition for the replaced part? Can the part affected be inspected & repaired per approved OEM manual and release to service again?

c. Subparagraph (2.3) Replace the HPT rotor blades with serviceable ones.

i. [Q1] What is the final disposition for the replaced part? Can the part affected be inspected & repaired per approved OEM manual and release to service again?

d. Subparagraph (2.4) Remove from service the No. 3 ball bearing.

i. [Q1] What is the final disposition for the removed part? Can the part affected be inspected & repaired per approved OEM manual and release to service again?

EASA response:

As a general note, an EASA AD cannot require actions on an off-wing part. As an example, an AD cannot require to scrap a part after removal from an engine. An AD can anyway provide requirements for installation of a part on an engine.



Based on above, and taking into account the definition of “affected seal” (“...except those that, after the corresponding year as listed in Table 1 of the applicable SB, had a honeycomb replacement in accordance with the instructions of the applicable repair 003”), an affected seal can be released to service after the applicable repair 003 is accomplished on that seal, after the year as listed in table 1 of the AD.

For other parts, operators should refer to the OEM instructions. It has to be noted that for the No3 ball bearing, the AD requires “removal from service in accordance with the instructions on the applicable SB”, which in turn provide instructions to scrap the part.

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

