

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-210

[Published on 05 December 2019 and officially closed for comments on 02 January 2020]

Commenter 1: Lufthansa Technik AG – Lars Weinerth – 11/12/2019

Comment # 1

After reviewing EASA PAD 19-210, DLH has some concerns about the accomplishment of the requirements. Acc. to paragraph (1): We have no complaints.

A. Paragraph (2): We see a high risk of a too late provisioning of the A/C after a check and therefore a risk of a delay for the operation. The formula that has to be used acc. to SB A380-24-8158 is: Water ingress rate = (drained oil – 420ml) / number of month from last RAT service.

The oil filling procedure in the SB A380-24-8158 advises that the oil have to be filled into the fill port until it starts to spill. During this procedure, it is possible that an amount of oil between 420 to 460 ml can be filled. In the case, if an amount of 450ml was filled during a previous check, the calculation for the water ingress rate is too high and can lead to a wrong interval determination, when the oil is drained again. The calculation acc. to the formula would show a water ingress rate of 5ml/month (450ml-420ml/6 month = 5ml/month).

Obviously, in this case, we would have no problem with the RAT and no water ingress, but due to the calculation, we need to ask Airbus before next flight and need to wait for the answer. The formula needs to be adapted and the requirement “before next flight” needs to be changed.

B. Paragraph (3): This reporting interval is tough because the previous EAD 2019-0192 had a reporting interval of 30 days. Why should the operator now report 3 times faster compared to the last EAD when the task that needs to be performed is almost the same?

C. paragraph (4): Why is no terminating action determined?

EASA response:

A. Comment agreed. The Final AD has been amended, removing ‘before next flight’ and inserting instead ‘within 10 days after that DET’. The definition of the water ingress calculation formula, which is part of Airbus SB A380-24-8158, is in progress of revision.

B. Comment not agreed. The reporting requirement is considered appropriate and proportional to the risk.

C. Comment noted. Terminating action is expected but not available yet, so until then the AD factually states “None”.

No changes have been made to the Final AD in response to points B and C of this comment.

Commenter 2: Etihad Airways – John Willer V. Morales – 12/12/2019

Comment # 2

As per discussion with Airbus during the webex last 28 Nov, reporting will be performed within 10 days after each inspection even if the result of calculation for water ingress rate is higher than 4ml per month. This will be reflected in the SB as mentioned in the attached minutes of minutes Item 6.

In the AD Corrective Action, it is stated that:

“If, during any DET as required by paragraph (1) of this AD, the calculated water ingress rate is higher than 4 ml per month, before next flight, contact Airbus for approved instructions (which may include redefinition of the DET interval and possible additional actions to be accomplished) and, thereafter, within the compliance time(s) specified therein, accomplish those instructions accordingly.”

This is in contrary with the agreed reporting period with Airbus. Please consider and make the necessary correction.

EASA response:

Comment agreed. The Final AD has been amended; see EASA answer to Comment # 1 point A above.

Commenter 3: Qantas Airways Limited – Bob Svensson – 18/12/2019

Comment # 3

I have reviewed the PAD in conjunction with SB A380-24-8158, Rev 00 and information provided by Airbus to A380 operators during a recent Webex (28 November 2019). The PAD Corrective Action requires Airbus to be contacted before further flight for approved instructions if the water ingress rate is calculated to be greater than 4ml/month. Received Airbus instructions are to be actioned within the time specified by Airbus.

Currently per SB A380-24-8158, Rev 00, if the water ingress rate is greater than 4ml/month it requires operators to contact Airbus, receive specific instructions and do any Airbus recommended actions, all before the next flight. Airbus in a recent Webex with operators stated that they would revise the SB to allow reporting of the excessive water ingress rate to be within 10 days and for the resulting Airbus recommended actions to be done within the time frame specified within the recommendation.

Could EASA consider revising the Corrective Action to allow reporting of an excessive water ingress rate to be within 10 days, and thereafter following the time limits specified within the subsequent Airbus instructions for further actions?



EASA response:

Comment agreed. The Final AD has been amended; see EASA answer to Comment # 1 point A above.

Commenter 4: Emirates – Randy G. Gamboa – 23/12/2019
Comment # 4

- A. PAD Inspection: QUOTE - Inspection(s): (1) Within the compliance time as defined in Table 1 of this AD, as applicable, and, thereafter, at intervals not to exceed 6 months or 4 000 flight hours (FH) whichever occurs first, accomplish a DET of the gearbox oil of the affected part in accordance with the instructions of the SB. - UNQUOTE

Can the condition that the intervals specified above apply only to calculated water ingress rate lower than or equal to 4ml per month be included?

- B. PAD Corrective Action: QUOTE - Corrective Action(s): (2) If, during any DET as required by paragraph (1) of this AD, the calculated water ingress rate is higher than 4 ml per month, before next flight, contact Airbus for approved instructions (which may include redefinition of the DET interval and possible additional actions to be accomplished) and, thereafter, within the compliance time(s) specified therein, accomplish those instructions accordingly. - UNQUOTE

The following Compliance in Revision 00 of SB A380-8158, do align with the above:

Calculated water ingress rate is higher than 4 mL/month(**)	Contact AIRBUS via TechRequest to review the results of the inspection and receive specific recommendations	Before Next Flight	None	None
Calculated water ingress rate is higher than 4 mL/month(**)	Do additional actions recommended by Airbus if any	Before Next Flight	None	None

However, Airbus will be revising the SB and has issued TA for the following changes:



Calculated water ingress rate is higher than 4 mL/month(**)	Contact AIRBUS via TechRequest to review the results of the inspection and receive specific recommendations	Before Next Flight Within 10 days	None	None
Calculated water ingress rate is higher than 4 mL/month(**)	Do additional actions recommended by Airbus if any	Before Next Flight According to Airbus recommendations	None	None
Calculated water	Do the repetitive	None	None	At a customized

We understand from Airbus that the AD will include the above changes. Your confirmation will be very much appreciated.

EASA response:

- A. Comment not agreed. Any reduced DET interval is part of the corrective actions; prior to DET interval computation, the compliance time specified must be used to accomplish the first DET.**
- B. Comment agreed. The Final AD has been amended; see EASA answer to Comment # 1 point A above.**
- No changes have been made to the Final AD in response to point A of this comment.**

