

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-004

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Commenter 1: Delta Air Lines – James Thompson – 03/02/2020

Comment # 1

Reference:

(A) EASA Proposed Airworthiness Directive: PAD No. 20-004, dated 14 JAN 2020

(B) Airbus Service Bulletin (SB) A350-78-P013

(C) Goodrich Aerostructures Vendor Service Bulletin (VSB) RA35078-059

SUMMARY:

Airbus SB A350-78-P013 (Ref. (B)) and Goodrich VSB RA35078-059 (Ref. (C)) have been issued by Airbus and Goodrich respectively to address reports of findings of detached thrust reverser hinge nuts. Further investigation determined that nuts potential non-compliant locking features may have been installed. This condition, if undetected and not corrected, could lead to the loss of a thrust reverser during flight which could result in damage to the aircraft and/or people on the ground.

PAD Ref. (A) mandates inspections of the A350 thrust reversers for the presence of these nuts and replacement of the nuts in accordance with the SB Ref. (B) which references Ref. (C). If the nuts are present, the PAD Ref. (A) requires the removal of all nuts installed on both the LH and RH thrust reverser hinge positions 2,3, and 4 and the installation of new nuts and washers. If the nuts are not present, the PAD Ref. (A) requires the installation of new nuts and washers.

Additionally, PAD Ref. (A) requires a torque stripe to be applied to the replaced nuts. The inspection and the replacement actions must be accomplished within 6 months of the AD effective date. Reporting to Airbus must be accomplished within 30 days of the inspection.

DELTA'S COMMENTS

A) Upon reviewing the PAD Ref (A) applicability, DAL requests that the applicability be made to reflect the specific effectivity of the SB. As written, the PAD Ref. (A) requires accomplishment of the inspection and replacement of the thrust reverser nuts on ALL A350 aircraft regardless of the manufacturer serial number (MSN). This creates a conflict for operators in regards to the continued compliance of this AD. As written, the PAD Ref. (A) will require operators to inspect ALL A350 aircraft within 6 months of the AD effective date. However, operators may have A350 aircraft that will enter



service after the 6-month compliance time. This makes it impossible to comply with the PAD Ref. (A) as written. Additionally, the SB Ref. (B) establishes the applicability of specific aircraft MSNs and the VSB Ref. (C) establishes applicability via specific thrust reverser MSNs. For these reasons, DAL requests that the applicability of the upcoming AD be reflective of the specific SB Ref (B) effectivity. The applicability of the AD would be better defined, and potential compliance conflicts avoided if the applicability statement read as follows:

“Airbus A350-941 and A350-1041 aeroplanes, all manufacturer serial numbers (MSN) as identified in the SB.”

If EASA determines that ALL A350 MSNs must be subject to the inspection and replacement actions, then a compliance time window must be established for aircraft manufactured after the AD effective date.

B) DAL has also observed that there is a contradiction between the instructions in SB Ref. (B) mandated by the PAD Ref. (A) and the VSB Ref. (C). The PAD Ref. (A) paragraphs (2) and (3) and the SB Ref. (B) mandate instructions to replace both the nut and washer if only the nut is missing and mandate instructions to replace only the nut if an existing nut is found presently installed. The VSB Ref. (C) paragraph 3.C.1).a provides a third option, however. The VSB Ref. (C), which is referenced by the SB Ref. (B), states that in the case where the washer is still present and the nut is found to be missing, the washer may be retained for reuse with a newly installed nut. This scenario is not addressed by the PAD Ref. (A) or the SB Ref (B). DAL requests EASA address this contradiction by providing additional clarification about this third scenario in the final AD.

C) Paragraph (4) of PAD Ref (A) mandates reporting of the results of the inspection whether or not there are any findings during this inspection. DAL believes that the requirement to report results of both positive and no findings places an unnecessary burden on the operator, since negative findings are estimated to be low. Additionally, since a root cause for this issue has been established and a corrective action has been mandated, DAL requests the removal of the reporting requirement mandated by paragraph (4) of PAD Ref. (A) . If reporting is to be mandated in the final AD, DAL requests that the Final AD require reporting of findings of missing thrust reverser nuts only.

EASA response:

A) Comment agreed. Final AD has been updated accordingly

B) Comment agreed. The Goodrich SB has been included in the definition of “the SB”. EASA does consider there is contradiction between the Goodrich SB and the Airbus SB. The Goodrich SB includes reference to an additional possible condition and provides instructions how to address it.

C) Comment agreed. Reporting is no longer required in the AD

