

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-021

[Published on 28 January 2020 and officially closed for comments on 11 February 2020]

**Commenter 1: Cathay Pacific Airways – Janel Ray Rigor – 31/01/2020**

### Comment # 1

1A. It has been noted the PAD provide list of PN affected, however the below list of PN are not included which is applicable with reference to VSB RA35078-030 and Airbus SB A350-78-P009. QUERY: Will EASA update the and include the TR part numbers?

Serial	Part Number	Top Serial	MSN
0080001	351M3010-501	B-LRA	0029
0080001	351M3010-503	B-LRA	0029
0083001	351M3010-505	B-LRA	0029
0085001	351M3010-507	B-LRA	0029
0086001	351M3010-503	B-LRB	0032
0090001	351M3010-501	B-LRB	0032
0089001	351M3010-505	B-LRB	0032
0089001	351M3010-507	B-LRB	0032
0094001	351M3010-501	B-LRC	0034
0094001	351M3010-503	B-LRC	0034
0095001	351M3010-505	B-LRC	0034
0095001	351M3010-507	B-LRC	0034
0086001	351M3010-501	B-LRD	0038
0090001	351M3010-503	B-LRD	0038
0083001	351M3010-507	B-LRD	0038
0085001	351M3010-505	B-LRD	0038
0100001	351M3010-501	B-LRE	0039



0100001	351M3010-503	B-LRE	0039
0101001	351M3010-505	B-LRE	0039
0101001	351M3010-507	B-LRE	0039

1B. Can we include the SN of the Thrust reverser on the table for guidance, with reference to VSB A34078-030?

**EASA response:**

**Comment 1A: Comment agreed, the PAD has been revised accordingly**

**Comment 1B: Comment not agreed. Affected population is properly identified by P/N. No changes have been made to the revised PAD in response to this comment**

**Commenter 2: Delta Air Lines – James Thompson – 03/02/2020**

**Reference:**

(A) EASA PAD 20-021; dated January 28, 2020

(B) Airbus SB A350-78-P009, Revision 00; dated June 08, 2018

(C) Collins Aerospace / Goodrich / ROHR INC (51563) VSB RA35078-030 Revision 01; dated November 11, 2019

**SUMMARY:**

A fire test revealed that the latches for the forward and aft pressure relief doors could be opened during exposure to fire, leading to a breach in the engine core firewall. Further investigation results revealed that the spring rate of the washers could deviate under fire.

Ref (A) has been issued which will require accomplishment of Ref (B) and Ref (C) to address this potential unsafe condition. This condition, if not corrected, could lead to an uncontained fire, possibly resulting in reduced control of the aeroplane.

**DELTA'S COMMENTS**

Delta Air Lines respectfully submits the following comments regarding the subject proposed rule.

Please recognize that while PAD 20-021 (Reference (A)) defines "The SB" as Airbus SB A350-78-P009 (Reference (B)), the details for the modification are contained within Collins Aerospace VSB RA35078-030 (Reference (C)), which is required by Ref. (B).

**Comment # 2A**



Recall the Ref. (A) definition of an “Affected TR / LAD”:

Thrust Reversers (TR) and latch access doors (LAD), having a Part Number (P/N) as listed in Table 1 of this AD.

Ref. (A) Table 1 provides Part Numbers for Thrust Reversers and Latch Access Doors which did not receive thermal improvements according to MOD 111025, however the part number list given within Ref. (A) Table 1 is incomplete. For example:

MSN 0149 #1 Engine was delivered in the Pre-MOD 111025 configuration equipped with LH Thrust Reverser Part Number 351M3010-531, which is not included within Ref. (A) Table 1 but is included within Ref. (C) as an affected part.

MSN 0149 #2 Engine was delivered in the Pre-MOD 111025 configuration equipped with LH Thrust Reverser Part Numbers 351M3010-533, which is not included within Ref. (A) Table 1 but is included within Ref. (C) as an affected part.

The final rule should not be released until a more comprehensive definition for an “Affected TR / LAD” is established.

#### ***Comment # 2B***

Recall the Ref (A) Modification paragraph 1.3 requires the following:

Re-identify the P/N of the affected TR / LAD.

Please direct your attention to Ref. (C), Paragraph 2: MATERIAL INFORMATION, specifically paragraph E:

Parts Affected. At the conclusion of this section, note the following:

Part Numbers are not changed by this retrofit only SB reference is added.

Note also that while the Ref. (C) Accomplishment Instructions require the marking of “RA35078-030” onto both the LH & RH TR ID plates and the FWD and AFT LAD ID plates, the part numbers are not changed. Apparently, the LAD part number cannot be rolled without the embodiment of VSB RA35078-006 (and perhaps other changes internal to the LAD). SB RA35078-006 is not a concurrent requirement of Ref. (C).

Therefore, it is impossible to “Re-identify the P/N of the TR / LAD” as required by Ref. (A) paragraph 1.3, as the part number of the TR / LAD does not roll with this alteration.

#### ***Comment # 2C***

Records for accomplishment of the firewall improvements will be maintained on TR / LAD ID plates and on component paperwork upon accomplishment of Ref. (C). The parts installation prohibition provided within Ref. (A) paragraph 2 is manageable, but only if the Ref. (A) definition for “Affected TR / LAD” is improved.

The definition for “Affected TR / LAD” should not be established by production part number (Ref. (A) Table 1), but rather Ref. (A) should include a records verification allowance for AD compliance which allows for:

a. Units whose aircraft delivery records indicate embodiment of MOD 111025 at production



b. Units whose serviceability paperwork and/or component ID plates indicate embodiment of VSB

RA35078-030.

**Comment # 2D**

Ref. (C) is not written in “Required for Compliance” format. There are several steps contained within Ref. (C) which have nothing to do with resolution of the airworthiness concern. These steps should not be considered mandatory for compliance with the proposed rule. For example:

The removal/installation of the L2 placards from/onto the FWD and AFT LADs is for part identification purposes, but these steps do not contribute to improved firewall integrity. Further, Ref. (C) step G. (7) requires that the placard adhesive be allowed to cure. Waiting for adhesive [which secures a placard to a part] to cure should never be considered RC.

If a final rule is going to mandate the accomplishment of an Airbus SB and that SB, in turn, mandates the accomplishment of a vendor SB, the Airbus SB should identify those steps within the vendor SB which rectify the airworthiness issue as RC. The regulatory agencies and OEMs should not drive operational burden onto the operators for recommendations or best practices.

**Comment # 2E**

Ref. (C) Accomplishment Instructions do not effectively consider the possibility that optional VSB RA35078-006 is not embodied. If an operator elects not to embody optional VSB RA35078-006, the modified LADs must be secured to the RH TR half while the lower aft thermal blanket is removed. As written, because Ref. (C) paragraph F. installs the improved lower aft thermal blanket prior to Ref. (C) paragraph I.(1), operators would needlessly be forced into (1) installation of the improved blanket, (2) removal of the improved blanket in order to accommodate the pre- SB RA35078-006 doors, (3) installation of pre-SB RA35078-006 doors, and (4) re-installation of the improved lower aft thermal blanket.

DAL would recommend that the final rule be postponed until Airbus and its vendor more effectively consider the order of operations defined within their SBs, taking into consideration those operators who choose not to embody their Optional Service Bulletins.

**EASA response:**

**Comment 2A: ref EASA answer to comment 1A.**

**Comment 2B: Comment agreed, the revised PAD has been updated accordingly.**

**Comment 2C: Comment agreed, the revised PAD has been updated accordingly.**

**Comment 2D: Comment noted and forwarded to Airbus. No changes have been made to the revised PAD in response to this comment.**

**Comment 2E: Comment not agreed. Goodrich SB RA35078-006 is not related to this AD. Sequencing of operation of the 2 Goodrich SB is also not related to AD.**

