

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-021R1

[Published on 25 February 2020 and officially closed for comments on 10 March 2020]

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

Comment # 1

- Reference:**
- (A) EASA PAD 20-021R1; dated February 25, 2020
 - (B) EASA PAD 20-021; dated January 28, 2020
 - (C) Airbus SB A350-78-P009, Revision 00; dated June 08, 2018
 - (D) 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 20-021R1 (Reference (A)) defines “The SB” as Airbus SB A350-78-P009 (Reference (C)), the details for the modification are contained within “The Goodrich SB”: Collins Aerospace (51563) VSB RA35078-030 (Reference (D)). Ref. (C) requires alteration in accordance with the Accomplishment Instructions contained within Ref. (D).

Comment #1:

Recall the Ref. (A) definition of an “Affected TR / LAD”, which has been revised from the Ref. (B) definition:

Thrust Reversers (TR) and latch access doors (LAD), having a Part Number (P/N) as listed in Table 1 of this AD and not marked with the Goodrich SB reference on component identification plate.



Ref. (C) requires that equipment be re-identified in accordance with Ref. (D).

Ref. (D) contains the following instructions for marking said equipment:

Thrust Reverser:

Mark SB Reference "RA35078-030" on the LH and RH thrust reverser ID plate.

Latch Access Doors:

Stamp the Service Bulletin Number "RA35078-030" on the FWD and Aft Latch Access doors below the existing part markings.

With respect to the LH and RH thrust reverser equipment, compliance with Ref. (A) can be maintained as the instructions in Ref. (D) agree with Ref. (A) Modification instruction (1.3).

With respect to the FWD and Aft Latch Access doors, compliance with Ref. (A) cannot be maintained because there is no identification plate on the doors.

Comment #2:

DAL observes that there is no Service Bulletin Revision Level definition contained within Ref. (A). Is the EASA's intention to allow modification according to any SB revision level?

Comment #3:

DAL notes that Ref. (A) has revised the compliance time defined within the proposed rule's Modification instruction (1). Ref. (B) originally authorized compliance within 4 months after the final rule's effective date, while Ref. (A) has shortened this compliance time down to 3 months. Can the EASA explain what is driving the urgency to execute on these alterations? Has Rolls Royce provided some statistical data for determining the probability of an engine fire which is driving the compressed compliance timeframe?

EASA response:

comment #1: Agreed.

Definition was amended accordingly.

comment #2: Noted

EASA confirms that any revision of the SB/Goodrich SB is acceptable for compliance with the AD. Ref publication chapter into PAD is referencing all revisions.

comment #3: Noted

Question 1: The compliance time reduced from 4 to 3 months due to revised PAD publication following several public comments.

Question 2: Not applicable, refer above answer.



