

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-076

[Published on 11 May 2020 and officially closed for comments on 08 June 2020]

Commenter 1: easyJet – Graham Pearce – 12/05/2020

Comment # 1

A) Para 2 says “do not install on any engine an affected part.....” The definition of an affected part is one of those listed in Table 1 of the SB. However, we are permitted to install a listed s/n if it has passed the inspection in the SB, because it has become a “serviceable part.” Therefore I wondered if the definition of “affected part” should be extended to: one that is listed in Table 1 of the SB and has not undergone and passed the inspection required by the SB.

B) A note in para 1 says “Note 1: After passing an immersion ultrasonic inspection as defined in the SB, an affected part is effectively a serviceable part.....”

I wondered if the word “effectively” is not the best word in this context, because the word “effectively” has a slightly soft definition such as: “actually but not officially or explicitly” – which is the opposite of the intention of the note.

Maybe instead the sentence could say: “Note 1: After passing an immersion ultrasonic inspection as defined in the SB, an affected part is **effectively then considered to be** a serviceable part.....”

EASA response:

1A) Comment agreed. Final AD has been amended accordingly.

1B) Comment agreed. Final AD has been amended accordingly.

Commenter 2: Lufthansa Technik – Florian Weinz – 25/05/2020

Comment # 2

2A) In general the wording of the PAD and the technical intent is clear. But there seems to be a little room for misinterpretation when it comes to an engine shop visit where an engine module (the HPT Rotor module) with an affected part installed is removed from an engine and planned to be re-

installed on the same engine or to a different engine without prior disassembly to piece part level. If such a removed and re-installed HPT Rotor module contains an affected HPT Stg.2 Disk, the final AD should clearly state, if re-installation of such modules is allowed on the same engine and/or on a different engine.

2B) The PAD states a qualified shop visit as “Any engine shop visit involving the removal of an affected part from the engine.” which includes the removal of the whole HPT Rotor module. Per PAD Section (2), the re-installation of such a HPT Rotor module (with an affected part installed) is not allowed on both group 1 and group 2 engines. This leads to the case that every HPT Rotor module, which has an affected part installed and is removed from an engine without intention for disassembly of such module (e.g. to get access to other engine modules only), is then required to be disassembled to piece part level as a re-installation is forbidden per PAD Section (2).

A proposal could be to update the definition of a qualified shop visit to a wording like “Any engine shop visit involving the removal and disassembly to piece part level of an affected part from the engine.”.

2C) In addition PAD section (2) would need also an update to reflect the requirements for installation of modules with affected parts.

Thank you for taking this comment into account for the final AD to PAD 20-076.

EASA response:

2A) Comment agreed. Final AD has been amended accordingly. For Group 1 engines, the prohibition to install an affected part (or an HPT module with an affected part installed – as clarified in the Final AD) is effective only after replacement of the affected part.

2B) Comment agreed. Final AD has been amended accordingly.

2C) Comment agreed. Final AD has been amended accordingly.

