

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-079

[Published on 13 May 2020 and officially closed for comments on 27 May 2020]

Commenter 1: British Airways – Oliver Townley – 18/05/2020

Comment # 1

British Airways would like to make an operator comment on this proposed AD. From our understanding the issue addressed by the applicable SB 73-AK451 is to introduce a hard overhaul life of 16,000FH due to a possible reduction in max fuel flow potential at ages higher than this. If a pump is unable to achieve max fuel flow it may be unable to sustain maximum continuous thrust, and therefore unable to meet the minimum standards for ETOPS.

BAW have 12 affected pumps fitted to the applicable rated TRENT1000-J2 engines giving us the operator 20 days from NMSB publish date (12th May) until the compliance date of 31st May to source replacement pumps, deschedule aircraft, and resource the work during a period with social distancing and a reduction in manpower across the business. RR and their supplier Collins have already announced that meeting the supply of new / overhauled or lower life fuel pumps will be challenging given the timescales proposed in this AD.

Should the risk proposed from this AD be related to ETOPS, can any credit be given to any depairing and stagger to allow for extension of the compliance date. I propose this as BAW have 2 tails with dual pumps above the threshold fitted, and these naturally would be a priority aircraft to target (and as of 19/05/2020 will have had the intent of the SB carried out already), due to the dual engine risk. This would allow further time to replace the remaining affected pumps.

EASA response:

Comment not agreed. The risk associated to this fuel pump degradation issue does not only apply to aeroplanes with dual pumps above threshold. An aeroplane with a single pump above threshold remains at risk of not being able to meet fuel demand should the other engine fail at any point in the flight for any reason (regardless of whether that other engine has a pump above threshold or not). Although EASA concurs that an aeroplane with a single pump above threshold carries less risk than an aeroplane with dual pumps above threshold, this risk remains unacceptable.

No changes have been made to the Final AD in response to this comment.



Commenter 2: Singapore Aero Engine Services Private Limited – Malek Abdul – 22/05/2020

Comment # 2

- A. Is D.1.4 of the NMSB applicable to this AD? Which data is to take precedence – Appendix 1 or customer data?
- B. As the rating for engines can change based on operator's request, is the AD applicable to an engine that is received with a different rating but will be dispatched with 1000-D2, J2 or K2?
- C. Referring to the Life Limitation paragraph of the AD, point 1, "all ratings" refer to all T1000 ratings or 1000-D2, J2 and K2 only?
- D. Can the AD have a definition for "Serviceable Part"?

EASA response:

- A. Comment agreed. Paragraph D.1.4 of the NMSB applicable refers to special compliance times for a list of affected parts listed in Appendix 1 of the NMSB, which can be used. The Final AD has been amended accordingly to clarify this point.**
 - B. Comment acknowledged. It is confirmed that the unsafe condition is present on Trent 1000-D2, Trent 1000-J2 and Trent 1000-K2 rated engines, which has determined the Final AD Applicability. If an engine currently has a different rating and, at a certain point in service, the rating is changed into -D2, -J2 or -K2 rating, the AD becomes applicable to that engine and consequently, the operator has to ensure that the applicable life limit for the affected part is taken into account.**
 - C. Comment acknowledged. EASA confirm that 'All ratings', means all ratings for this AD.**
 - D. Comment agreed. The definition of 'Serviceable part' has been introduced in the Final AD.**
- No changes have been made to the Final AD in response to points B. and C. of this comment.**

Commenter 3: All Nippon Airways – Takuma Koga – 27/05/2020

Comment # 3

- A. It would be helpful to have the definition of "Groups in the "Definitions" section to be more specific. For example, it could be more clear by defining as shown below:
 Group 1 engines are those that are D2, J2, and K2 rated and have an affected part installed.



Group 2 engines are those that are not D2, J2, and K2 rated and have an affected part installed (engines that are not grouped as "Group 1").

B. Please add the treatment of the fuel pumps listed in Appendix 1 mentioned in 1.D.(4). of the NMSB, to the "Required Action(s) and Compliance Time(s)" section of the AD. Since Appendix 1 will be a list of fuel pumps, which have been sufficiently repaired at vendor to be considered overhauled, operators would want to maximize the benefit from being able to use these units.

EASA response:

A. Comment not agreed. See EASA answer to Comment # 2, Point B. No changes have been made to the Final AD in response to this comment.

B. Comment agreed. See EASA answer to Comment # 2, Point A.

