

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-114

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Commenter 1: Delta Air Lines – James Thompson – 19/08/2020

Comment # 1

Reference:

(A) EASA Proposed Airworthiness Directive: PAD No. 20-114, Dated 28JUL2020

(B) Airbus Service Bulletin (SB) A320-53-1473, Dated 20DEC201

SUMMARY:

Quality investigations recently identified that false drill starts made on the Final Assembly Line (FAL) may be present around the latch hook mounting holes on the Left Hand (LH) and Right Hand (RH) side of both Frame 16 and Frame 66 (i.e. FWD frame of LH and RH Doors 1 and 4) on some A321-200 aircraft. If this condition is not detected and corrected, the structural integrity of the aircraft could be reduced.

REF (A) was issued to address this concern and mandates accomplishment of a one-time detailed visual inspection (DET) and corrective actions, as applicable, via REF (B) on potentially affected A321 aircraft. Note, this PAD includes the following definitions:

- Affected part:

Left-hand (LH) and right-hand (RH) side door frames (FR), having Part Number (P/N) D531-35046 (at FR16 LH section 11/12), P/N D531-14469 (at FR16 RH section 11/12), P/N D534-80062-296 (at FR66 LH section 18) or P/N D534-80062-297 (at FR66 RH section 18).

- The SB:

Airbus Service Bulletin (SB) A320-53-1473.

- The applicable repair procedure:

Airbus Structural Repair Manual (SRM) 53-11-12 or SRM 53-41-12, as applicable.

DELTA'S COMMENTS

DAL has reviewed REF (A) and REF (B) and has the followed comments about the proposed rule:

A. The first paragraph outlining the Reason in REF (A) is being issued currently states:

"It has been determined that, due to erroneous manufacturing processes, unintended drill starts could exist on certain affected parts."

Para 1.C.(1) of REF (B) states the following when giving the history about why this SB was released:

"False drill starts have been detected around the latch hook mounting holes on Frame 16 and Frame 66 Left Hand (LH) and Right Hand (RH) sides of A321-200 aircraft, at doors 1 and 4 locations. Quality investigation revealed that drill starts resulted from inappropriate manufacturing operations on MOBILE Final Assembly Line (FAL)."

While DAL understands that while the Reason paragraph of REF (A) is technically correct, it implies that the unintended drill starts could be located anywhere along the entirety of FR16 and/or FR66 (as defined under 'Affected Parts' given in the Summary above). Review of Para 1.C.(1) of REF (B) however, indicates that if found, the unintended drill starts are located in a very specific spot along the frame structure: the latch hook mounting holes. Review of the work instructions in REF (B) also indicates the latch hook mounting holes area of both FR16 and FR66 is the only portion of the frame inspected for the unintended drill starts, not the frames' entirety. To make the Reason paragraph of REF (A) more clear about where the potential discrepant condition could be on FR16/FR66 structure, DAL requests revision of REF (A)'s first Reason paragraph so that it reads as follows:

"It has been determined that, due to erroneous manufacturing processes on the Final Assembly Line (FAL), unintended drill starts could exist on certain affected parts near or around the latch hook mounting holes."

B. Para (1) and (2) of REF (A) outline the one-time detailed visual inspection and corrective action (if required) requirements that must be complied with in order to detect/correct any potential unintended drill starts in SBA320-53-1473's inspection area. DAL notes that these PAD paragraphs state to inspect and repair only 'affected parts' as they are defined in the summary given above - this definition includes reference to four (4) specific frame part numbers, one each for LH FR16, RH FR16, LH FR66, and RH FR66.

The inspection/repair service bulletin, REF (B), is written at the aircraft level (like the effectivity paragraph of REF (A)) – however, DAL notes that the inspection/repair SB requires work accomplishment on ALL MSN's identified in the SB's effectivity, not a specific subset of 'affected parts'. In order to comply with the SB's instructions as written, all FR16 and FR66 parts in the inspection area, regardless of frame part number, must be inspected.

As REF (A) is currently written, frame part numbers that are installed on effective MSN's but do not fall into the 'affected part' definition in the PAD would NOT require inspection/corrective action. This is not aligned with the requirements of REF (B) to inspect all applicable MSN's regardless of frame part numbers.



DAL proposes the frame part number references in REF (A)'s 'affected parts' definition are removed to align the requirements of the PAD with the instructions/requirements of the SB. Said revision would read as follows:

"Affected part: Left-hand (LH) and right-hand (RH) side door frames at FR16 LH section 11/12, FR16 RH section 11/12, FR66 LH section 18, or FR66 RH section 18."

C. Para (2) of REF (A) outlines what corrective actions should be taken when damage (i.e. the unintended drill starts by the latch hook mounting holes) is found on affected FR16 and/or FR66 structure. 'The applicable repair procedure' defined above includes reference to both SRM 53-11-12 (for FR16) and 53-42-12 (for FR66). Para (2) states that either one of these 'applicable repair procedures' should be accomplished, or Airbus should be contacted for repair instructions. Review of REF (B) indicates that the corrective actions outlined in Para (2) of REF (A) are identical (as applicable to FR16 and FR66) to the repair options outlined in the subject SB - if damage is found and is within the applicable repair allowable limits, the SRM repair should be applied; if damage is found and is outside of the applicable SRM repair allowable limits, Airbus is to be contacted for repair instructions.

REF (B) is written in Required for Compliance (RC) format, and all instructions in Paras 3.C. (Procedure) and 3.D. (Testing) must be accomplished without any deviation. Accomplishment of any required repair procedures (SRM or through contacting Airbus) is contained within the Para 3.C. instructions. DAL believes that while the current verbiage in Para (2) is technically correct, the paragraph could be written in a way that is simpler and/or more indicative of the requirement to accomplish all corrective actions in accordance with the instructions of REF (B).

DAL requests ONE of the following two proposed revisions is accomplished:

(1) Remove the statement defining 'the applicable repair procedure' from the PAD's Definition paragraph.

-AND-

Revise Para (2) of REF (A) as follows:

"If, during the inspection as required by paragraph (1) of this AD, any damage is found on an affected part, before next flight, repair that affected part in accordance with the repair instructions of the SB."

(2) Revise Para (2) of REF (A) as follows:

"If, during the inspection as required by paragraph (1) of this AD, any damage is found on an affected part, before next flight and using the repair instructions in the SB, repair that affected part in accordance with the instructions of the applicable repair procedure, or contact Airbus for approved corrective action instructions and, within the compliance time as specified therein, accomplish those instructions accordingly."

EASA response:

1A) Comment agreed – Final AD has been updated accordingly



1B) Comment not agreed. EASA confirms that the unintended drill starts only affect those parts as identified in the AD, installed on the MSN identified in the applicability of the AD. No changes have been made to the Final AD in response to this comment.

1C) Comment agreed – Final AD has been updated accordingly

