

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-178

[Published on 06 November 2020 and officially closed for comments on 04 December 2020]

**Commenter 1: United Airlines – Irene Ibrahim – 04/12/2020**

### Comment # 1

A. Regarding EASA PAD 20-178, Page 2 of 5, Paragraph (1) and Paragraph (2) require accomplishment of eddy current inspection (ECI) or fluorescent penetrant inspection (FPI) for Initial Inspection and Repetitive Re-inspections of the mount struts of each affected part installed on the LPT assembly. Referencing a similar LPT TRF inspection requirement for the CFM56-7B engines per FAA AD 2010-01-05, FAA AD 2008-03-09, and CFM56-7B SB 72-0579, United Airlines proposed and was approved an AMOC to allow use of alternate ECI procedure, tooling, and consumable materials for performing the ECI of the turbine rear frame for compliance with Paragraphs (f)(3) and (f)(4) of AD 2010-01-05. This CFM56-7B AMOC to FAA AD 2010-01-05, Paragraphs (f)(3) and (f)(4) approves the use of procedure outlined in United Airlines Non-Destructive Test Manual, Part 6, Section 72-56-01, dated February 15, 2016.

United Airlines has demonstrated to the engine manufacturer with their concurrence that a much higher level of confidence and detectability can be obtained using the proposed tooling and method to inspect welds, increasing the level of safety.

United Airlines is requesting to apply the same approved AMOC from the CFM56-7B engine as an alternate means of compliance for the ECI initial inspection and repetitive re-inspections requirements of EASA PAD 20-178 Paragraph (1) and Paragraph (2).

B. Regarding EASA PAD 20-178, if the CFM56-5B SB 72-0850 is to be incorporated by reference, please specify which sections are required for compliance. United Airlines is requesting not to IBR the Service Bulletin 72-0850 in its entirety.

### EASA response:

**A. Comment not agreed. As general information, an alternative method of compliance, based on a specific operator's own instructions/methods, is not appropriate to be included in an AD. That operator can apply for approval of an AMOC to an AD, once issued. Additional information can be found in the EASA website, at this [link](#). For the record, EASA cannot accept applications for AMOC applicable to aircraft registered in a non-EASA member State.**

**B. Comment noted. EASA ADs do not "incorporate by reference" (legal concept, particularly in US regulation) the referenced publications. The AD requires inspection in accordance with specific sections in (i.e. using specific instructions of) the referenced SB.**



*No changes have been made to the Final AD in response to these comments.*

