

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-179

[Published on 09 November 2020 and officially closed for comments on 07 December 2020]

Commenter 1: United Airlines – Neil Sorensen – 24/11/2020

Comment # 1

1A) Paragraph (1): ISB 53-1288 R02 introduces a new Caution statement that a minimum of three (out of four) bolts must always be installed and the stop fittings cannot be removed during the inspection. United contacted Airbus to retract this statement, since damage at any one hole requires all four fasteners and stop fitting to be removed to accomplish applicable SRM 53-41-12 repairs. In addition, concurrent accomplishment of MSB 53-1290 requires removal of all four fasteners and stop fittings to accomplish cold expansion. Airbus did not determine that removal of all four bolts and/or stop fittings constituted a deviation to ISB 53-1288 R02 if these situations apply. However, we believe it is necessary to clarify the AD Inspection requirement, as it may conflict or burden the AD Corrective Action and/or Terminating Action requirements. Please add a Note in this paragraph that it is not necessary to remove and install one bolt at a time for each stop fitting location, as long as the inspection is accomplished prior to a repair or modification.

1B) Paragraph (7) and (11): These paragraphs imply that SRM 53-41-12 repairs do not constitute terminating action for the paragraph (1) inspections, since SRM 53-41-12 does not specifically state the repair constitutes terminating action for the inspection SB. ISB 53-1288 R01 was clear that SRM repairs required application of the SRM inspection program with no further repeat SB inspection requirements. However, ISB 53-1288 R02 and this PAD no longer specify if the SRM inspection program cancel the paragraph (1) inspection requirements. Be advised that accomplishing ISB 53-1288 R02 at an SRM repaired (oversized) hole may create risk of an incorrect fastener installation, as the inspection SB re-installs nominal size fasteners. Please clarify post-SRM repair inspection requirements. We believe the SRM inspection program should be applied at the SRM repaired hole(s), in lieu of paragraph (1).

1C) Paragraph (10): Please consider omitting this paragraph. It appears redundant with paragraph (9) since a modified “fastener hole” can also apply to a modified “affected area.”

EASA response:

1A) Comment noted. It is confirmed that the caution applies only during inspection. Airbus has been informed and may update SB accordingly. Airbus can be contacted for clarifications/approved instructions pending SB update. No changes have been made to the Final AD in response to this comment.



1B) Comment agreed. It is confirmed that SRM inspection program has to be followed. Final AD has been updated accordingly.

1C) Comment noted. Even if the comment is technically agreed, EASA prefer keeping the redundant paragraph also based on comments received on other ADs.

Commenter 2: Air France – Benjamin Pouyet – 25/11/2020

Comment # 2

2A) §1: Is this new repetitive interval also applicable for A/C already inspected before the issue of the future AD, on which inspection program is launched iaw EASA AD 2016-0238 Appendix 1 intervals?

2B) §4: Could you please confirm/correct that credit can be taken for A/C inspected iaw inspection SB at revision 02 ?

EASA response:

2A) EASA AD 2016-0238 is superseded by this new AD. All affected aircraft must comply with the new inspection schedule mandated by this AD.

2B) Inspection accomplished in accordance with the instructions of the SB at revision 02 can be used for compliance with this AD, as applicable, under the clause “Required as indicated, unless accomplished previously.

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

Commenter 3: British Airways – Tom Eldridge – 07/12/2020

Comment # 3

This inspection is to detect cracking in the door stop fitting holes. BAW understands from EASA’s “Reason” paragraph in this PAD that these cracks are a result of fatigue. As EASA is aware, fatigue is entirely based on cyclic loading. That being the case, can EASA please clarify why a calendar restriction on the inspections is imposed, ref PAD Table 1. It is noted that the calendar requirements in Table 1 can be imposed under the clause “whichever occurs first” present on any aircraft over 25300 FC (Fr66) / 20000 FC (Fr68). As an example, using the compliance of Table 1 and Appendix 1, if an A320 pre-mod 160001 and pre-mod 160080 had accumulated 39,001 FC at the effective date of the AD, the Fr66 inspection would be due at 48000 FC according to the Appendix 1 thresholds, while Table 1 would require the inspection within 12 months, despite crack initiation and propagation not being dependent on calendar time.



In addition, with multiple aircraft currently parked/ stored due to the ongoing mass-grounding COVID situation, if EASA were to issue an AD with such a calendar requirement, BAW would request a clause that the calendar requirements do not apply while aircraft are stored/ parked, given that crack initiation and propagation is not dependent on calendar time.

With reference to PAD Para (6), BAW would question why previous Airbus repairs in the affected areas are no longer valid, as evidenced by the requirement to contact Airbus for additional instructions? Does this Para (6) requirement align with other SBs/ potential ADs in the area (e.g. SB A320-53-1491, which is adjacent to the affected area but is not related to tasks 534129/ 534130/ SB A320-53-1288)? Given that the SRM introduction states “A new revision of the SRM does not supersede the previous ones. The existing Allowable Damage Limits (ADL) and Repairs assessed and done with previous versions of the SRM are still valid and no reassessment is required unless specified via an Airworthiness Directive.” Can EASA please clarify which (if any) SRM repairs which are no-longer valid?

BAW politely requests:

- 3A) That EASA removes the calendar compliance times quoted in all lines of Table 1, or alters the compliance to “whichever occurs later” instead of “whichever occurs first”.
- 3B) If 3A) is not acceptable, that EASA includes a statement that calendar limitations are not applicable during extended parking/ storage as a result of COVID 19, and
- 3C) That EASA review the PAD para (6) to determine its necessity and clarify exactly which repairs are no longer acceptable.

EASA response:

EASA thanks British Airways for acknowledging EASA awareness of fatigue.

3A) Comment partially agreed: The thresholds listed in Appendix 1 are the thresholds listed in the superseded AD 2016-0238. EASA does not agree to a further extension for the CT of an inspections that was already required by a previous AD. The calendar time listed in Table 1 of the AD is replaced by a compliance time in FC to limit, as possible, the burden for operators due to the revised schedule now mandated by the new AD.

3B) Comment partially agreed: see EASA answer to comment 3A.

3C) Repair instructions (including post repair inspection) for findings during inspection unrelated to ALI tasks / inspection SB may require additional actions and/or updated threshold/intervals, due to the new optimised inspection schedule mandated by this AD . Including a full list of all possible affected repairs in the AD would be impractical and could lead to an overcomplicated AD, including requirements applicable to various group of small number of MSN.



Commenter 4: Cathay Pacific – Hyphen Choi – 07/12/2020**Comment # 4**

CPA have reviewed the PAD 20-179 and have the following comments.

- 4A) PAD Para 5 and 6 requires CPA to contact Airbus for additional required actions within the compliance time. All a/c within CPA's fleet are complying the AD 2016-0238C1 requirements. Some a/c have already performed the ISB 53-1288 inspection before the compliance threshold per AD 2016-0238C1, and these a/c have already had the compliance threshold passed per PAD 20-179 Para 1 Table 1. Hence they are unable to comply the PAD 5 and 6, EASA has to offer grace period (i.e. a reasonable period of calendar days counting from AD effective date) for CPA to contact Airbus and carry out the additional requirements within the grace period.
- 4B) PAD Para 5 and 6 have additional requirements for a/c performed SRM 53-41-12 or RDAS repair. All RDAS repairs are well tracked. However CPA have difficulty to track the SRM repairs, as the frontline normally carry out the approved SRM repair without informing CPA back office. The repair record (sometimes hand-written) tracking requires extensive manpower and time. CPA would like EASA to extend the AD effective date, our suggestion, 60 days from the AD issuance date in order for CPA to comply the finalized AD requirements (CPA is unsure about the final AD requirement, not until the AD issuance) and documentation controls.
- 4C) PAD Para 9 and 10 mention the terminating action can only be effective as long as the area is clean from repair. Hence, any post-mod MSB 53-1290 a/c has repaired per SRM 53-41-12 or RDAS, the ISB 53-1288 repeat inspection cannot be terminated. EASA please confirm. Practically, CPA will not setup the terminating action control based on this, since we are unable to setup the programme to control the mod status of each fastener hole.

EASA response:

4A) "Compliance time" in paragraph (5) or (6) of this AD refers to both initial threshold and repetitive interval. For an a/c having already accomplished the initial inspection, next action is required within 19 700 FC since that inspection. Paragraph (1) and Table (1) have been amended to clarify.

4B) Comment not agreed. The PAD has been posted on 09 November, somehow pre-alerting operators about the need to track previous inspections. See also EASA answer to comment 4A).

4C) Comment not agreed. For undamaged fastener holes, the modification SB is terminating action For repaired fastener holes, the Airbus repair may constitute terminating action.

