

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-186

[Published on 24 November 2020 and officially closed for comments on 08 December 2020]

Commenter 1: Malaysia Airlines Berhad – Hafizal Esa – 25/11/2020

Comment # 1

In regards to the above subject matter, MAS is currently have an enquiries to the new revise compliance time.

The new subject PAD issued to amend compliance time for the Fuel Pump installed at Location A as per below:

- Within 10000FH or 3000FC (whichever comes first) since first installation on an aeroplane, or since Eaton Aerospace CMM 28-21-55 repair (housing replaced), as applicable.

OR

- Within 30 days for positions 600QL1(2), 608QL1(2), 711QN1(2)(3)(4) and 712QN1(2)(3)(4) or within 40 days for position 112QA1(2).

It was noticed that the inspection on the Fuel Pump installed at Location A was initially introduced during the issuance of EASA AD 2017-0224

Therefore, the initial inspection was already done with a compliance specified as per EASA AD 2017-0224 below:

- Before an affected pump exceeds 10 000 Flight Hours (FH) since first installation on an aeroplane, or within 30 days (for center/rear center tank/aft transfer fuel pump) or 40 days (for stand-by fuel pump), whichever occurs later after the effective date of EASA AD 2017-0224 (17 November 2017).

Since the initial inspection was accomplished based on EASA AD 2017-0224 compliance and all MAS A330 aeroplane also already accomplished the repeat inspection at 5000FH or 1000 FH whichever applicable, and thereafter the inspection were carried out in compliance to EASA AD 2019-0291 subsequently EASA AD 2019-0291R1. MAS would like to propose for EASA to add additional Paragraph giving credit for action/inspection done i.a.w Airbus SB A330-28-3132 or Airbus AOT A28L006-17 (any revision) prior to the release of the new AD.

EASA response:

Comment noted. For affected parts that were tested, before the effective date of the Final AD, it is confirmed that Credit can be taken for those actions. This is confirmed in the Final AD with the standard sentence 'Required as indicated, unless accomplished previously:'. However, the flight



cycles (FC) accumulated by an affected part, when installed at Location A, must also be considered per this new Final AD. If those cycles are exceeded, the grace period of 30 or 40 days, as applicable, after the effective date, can be used for accomplishing the next inspection.

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

Commenter 2: Lufthansa Technik – Maximilian Pitzner – 25/11/2020

Comment # 2

- A. Well noted are the correct location A pumps compared to AOT Rev 06.
- B. The numbering of the Notes are incorrect. (Note 1 written in §1 and §2 followed by Note 2 written in §6).
- C. Compliance Time B of Table 1 can be seen as grace period for high cycle operator. To make it clear it would be better to give FIN positions, not to name the pumps.
- D. LHT has the opinion that the location B pump interval of 30mth or 10000FH is too high and LHT asks for a reduction. This was already addressed to EASA due to Case 2 and Case 3 findings on pumps with 1392FH and 12428FH accumulated. LHTs position was acknowledged but considered that the pumps were still within acceptable condition for location B pumps that are always covered with fuel.

EASA response:

- A. Comment noted. EASA confirm that the Final AD is correct, whereas the AOT contains a mistake that will be corrected at the next opportunity.**
- B. Comment agreed. The mistake was corrected in the Final AD.**
- C. Comment agreed. FIN positions were added in the Final AD.**
- D. Comment noted. For Location B fuel pumps, EASA have no concern with pumps with Case 2 and Case 3 erosion. If still installed, they can remain and be continuously inspected. But as soon Case 3 pumps are removed from one aeroplane, they can no longer be installed again. For Case 2 pumps, they can only be (re)installed at Location B. To address the specific pumps, we acknowledge your position but EASA consider that they are still within acceptable condition.**

No changes have been made to the Final AD in response to points A and D of this comment.

Commenter 3: Air France – Karim Patel – 10/12/2020



Comment # 3

We have the following comment:

The table 1 seems very similar to the paragraph #1 of EASA AD 2017-0224.

Please confirm the start date of inspection required by paragraph #1 / Table 1 of PAD 28-186?

Table 1 should indicate: “at effective date of this AD, except on pump on which AD 2017-0224 or AOT R00 has been already applied”.

Indeed, this inspection has already been done, because mandated by AD 2017-0224. So, please confirm that we have to perform this new inspection or not?

EASA response:

Comment partially agreed. The inspection of paragraph (1) of the Final AD is repetitive, not only a one-time action. In addition, the inspection of paragraph (1) is a partially retained requirement of previous ADs. In other words, the inspection already existed but the FC accumulated by an affected part, when installed at Location A, must also be considered. For a pump that was previously inspected, the next inspection is due before exceeding the interval values specified in Table 2 of the Final AD. If one of the 2 values is exceeded, the grace period specified in Table 1 – B can be used. A Note was added in the Final AD to clarify that.

