

COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-060

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Commenter 1: Cecilia Teeuwen – Delta Air Lines – 25/05/2021

Comment # 1

Reference:

/A/ EASA Proposed Airworthiness Directive: PAD No. 21-060, dated 29-Apr-21.

/B/ Airbus Service Bulletin (SB) A350-53-P067

/C/ TR 80914299-001

/D/ TR 80914299-006

/E/ FAA AD 2019-26-01

/F/ A350-53-P032 Rev 1, dated 12-Nov-18

/G/ A350-53-P037 Rev 0, dated 12-Nov-18

/H/ TR 80731669/001

/I/ TR 80731669/005

/J/ A350-53-P067 Rev 0

SUMMARY:

Previous EASA AD 2019-0206 and FAA AD 2019-26-01 discuss concerns of rotated or migrated THS bearings, where torn sealant could allow moisture between the bearing and bore, leading to corrosion. The ADs call for repetitive inspections per A350-53-P032 Rev 1, Ref /F/, and allows terminating action per A350-53-P037 Rev 0, Ref /G/. Ref /F/ and /G/ call for applying Alodine if bare metal is found during rework per Ref /F/ or /G/. However, the CML called out for the Alodine step is from the production drawing and therefore calls out the tank Alodine CML 10ABC1, rather than the touch up pen Alodine CML 10ABE1. Prior to accomplishment of work under FAA AD 2019-26-01, Ref /E/, Delta submitted to, Ref /H/ and received reply Ref /I/ from Airbus, which was used to obtain an AMOC to allow using touch up pen Alodine instead of tank Alodine for Ref /E/, /F/ and /G/.

New EASA PAD, Ref /A/ supersedes EASA AD 2019-0206 for similar problem on THS bearings on later A/C in production, and A350-53-P067 Rev 0, Ref /J/ again calls out tank Alodine per CML 10ABC1 instead of touch up pen Alodine per 10ABE1. Delta submitted to, Ref /C/, and received, Ref /D/, from Airbus in support of allowing touch up pen Alodine CML 10ABE1 instead of tank Alodine CML 10ABC1 during accomplishment of Ref /J/.

DELTA'S COMMENTS

Delta requests the following:

- (1) That the future EASA AD state that where Service Bulletin A350-53-P067 (any revision) calls for using CML 10ABC1, that operators may use CML 10ABE1 instead of CML 10ABC1.
- (2) That the future EASA AD include a provision that AMOCs approved under EASA AD 2019-0206 are also approved under the new AD (applicable to Service Bulletins A350-53-P032 and 53-P037).

EASA response:

(1) Comment noted. The use of CML 10ABE1 as alternative to 10ABC1 during SB A350-53-P067 embodiment has been validated by Airbus through TRM 80914299/006 based on ASR A350-A-51-21-11-00001-660A-A. Furthermore, EASA was informed that the TC Holder will introduce such information in forthcoming revision to this SB. However, the AD should not contain this level of detail.

(2) Comment noted. The existing AMOCs can only apply to the AD referred to in the AMOC. However, AMOCs approved against EASA AD 2019-0206 could be also approved under the new AD for SB A350-53-P032 and 53-P037 as the new AD does not alter the content of these two SB A350-53-P032 and 53-P037.

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

