

COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-101

[Published on 16 July 2021 and officially closed for comments on 13 August 2021]

Commenter 1: Air France – Séraphin Cailleux – 05/08/2021

Comment # 1

In PAD 21-101, Serviceable part definition is: An affected LSDS or affected DS that is new (not previously installed).

But, LSDS PN 6341A0000-02 can be Repaired, Tested and Inspected by CMM Liebherr 27-52-43.

So, Serviceable part definition can be:

- An affected LSDS that is new (not previously installed) or Checked and put Serviceable in accordance with CMM at Shop level.
- An affected DS that is new (not previously installed).

EASA response:

Comment agreed. It is acceptable to install LSDS in accordance with the CMM at shop level as serviceable. The Final AD has been amended to modify the definition of 'serviceable part'.

Commenter 2: Delta Air Lines – James Thompson – 12/08/2021

Comment # 2

Reference:

(A) EASA Proposed Airworthiness Directive: PAD No. 21-101, dated 16 July 2021

(B) Airbus Service Bulletin (SB) A350-27-P053

SUMMARY:



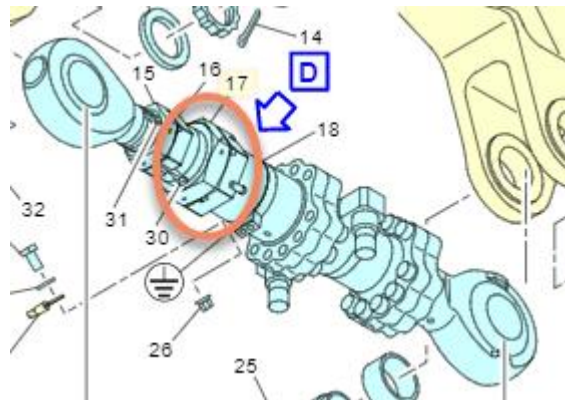
On the A350 final assembly line (FAL), certain Load-sensing drive struts (LSDS) and (Drive Struts) DS were found not adjusted (nut not torqued) and not locked. The results of investigations revealed that the LSDS and DS had been changed as re-work action due to pre-installation damage, but production operations (adjustment and locking as required according to installation procedure) were not considered after the components exchange. All aeroplanes in FAL have been cleared before customer delivery but 15 in-service aeroplanes have been identified to be potentially affected by this manufacturing issue. This condition, if not detected and corrected, could lead to degradation of the load carrying capability of an LSDS or DS, possibly resulting in in-flight detachment of a flap, with consequent damage to, and reduced control of, the aeroplane.

DELTA'S COMMENTS

- (a) Ref (B) Steps 3.C.(2)(b) 2 and 3 require use of a "counter key" which is not identified with a tool part number or as a picture. Airbus needs to further identify this tool as it is called out in an "RC" step. Ref (B) Steps 3.C.(2)(h) and 3.C.(5) are "RC" steps and require reporting information to Airbus.
- (b) Reporting information to Airbus is a business process and not a technical step that improves aircraft safety. Therefore, Delta requests that these reporting requirements be excluded from the AD mandated "RC" requirements in the final rule that will follow Ref (A).

EASA response:

- (a) Comment noted. The wording "counter key" is taken from the original AMM task MP A350-A-27-54-57-00001-520A-A concerning the installation of the LSDS. Here the wording "counter key" just means a standard "crowfoot wrench" tool for the nuts of the LSDS as shown in the screenshot below. No changes have been made to the Final AD in response to this comment.***



- (b) Comment noted. Note that the AD does not require reporting of findings, as the AD does not mandate the "RC" requirements of the SB.***

