

COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-113

[Published on 04 August 2021 and officially closed for comments on 01 September 2021]

Commenter 1: American Airlines – Dustin Bizub – 12/08/2021

Comment # 1

A) EASA PAD 21-113 requires the accomplishment of Airbus SB A320-53-1373 and A320-53-1374. Both Airbus SBs contain the follow phase in all inspection steps when referring to the NTM “from Revision No. 114 of May 01/17”. AAL requests that the EASA AD be updated to state that the latest NTM revision is permitted for accomplishment of the inspection.

B) Also, AAL noticed that the “Reason” paragraph has a typo in the first sentence referring to ALI task 531133 instead of ALI task 531153.

EASA response:

1A) Comment noted. EASA confirms that the sentence "from Revision No. 114" in the Airbus SB A320-53-1373 and A320-53-1374 refers to any NTM rev 114 or later. No changes have been made to the Final AD in response to this comment.

1B) Comment agreed. Final AD has been updated accordingly

Commenter 2: Cathay Pacific Airways – Ivan Cheung – 26/08/2021

Comment # 2

With regards to PAD 21-113, CPA would like to ask the following questions:

A) In our understanding, paragraph (3) together with paragraph (9) have given a credit for ANY repair instruction and post-repair requirement approved by Airbus, which was induced from ALI 531153 or 531155 inspection, to automatically terminate paragraph (1) requirement. However, similar extent of credit was not given to the ISB automatically when follow-up Airbus approved repairs are accomplished, as stated in paragraph (2) and (7). This is unless extra statement specifically stated in the Airbus document.



What is the reason for such difference when this PAD already made both ALI tasks and the ISB almost “interchangeable” by allowing it to supersede one another?

B) In paragraph (8) of the PAD, it stated that MSB done right after the ISB accomplishment before the next flight will be considered as a terminating action for the requirements in paragraph (1) on that affected area. However, since there were no co-current requirement to do both ISB and Mod SB previously, does accomplishment of the Modification SB alone during the same layover before the final AD effective date can also constitute a terminating action for paragraph (1)?

C) Further to the above question, we have a/c that has accomplished the MSB alone in the same layover and already have Airbus approved document for post-repair inspection instructions stating that it supersedes SB 53-1373 and in addition, MSB 53-1381 is no longer applicable to that area of the a/c, but cases like this was not clearly credited like those ALI tasks in paragraph (3) and (4). Will EASA extend such credit statement for cases like this and consider it as a terminating action for the paragraph (1) requirement? We suggest to simply include ISB alongside with ALI 531153, ALI 531155 in paragraph (4) if EASA finds it acceptable.

EASA response:

2A) Repair instructions ISB-related are still to be issued, consequently EASA cannot accept them in advance as terminating action. It is expected anyway that the repair instructions provided by Airbus will include statements to confirm whether the inspections may be terminated, or replaced by a different inspection regime, or supplemented by additional inspection.

2B) Comment agreed. Actually, the MSB requires accomplishment of rotating probe inspection of the fastener holes (unless inspections iaw the Inspection SB have been accomplished during the same lay-over period). In other words, an inspection of the fastener holes to be modified is anyway required just before modification, either in accordance with the instruction of the Inspections SBs or of the Modification SB. Final AD has been updated accordingly.

2C) See EASA answer to comment 2B. Accomplishment of the Modification SB on an affected area constitutes terminating actions for the repetitive SDI of that area, even if accomplished before the effective date of the AD (refer to the standard clause “Required as indicated, unless accomplished previously”). If all the Modification SB have been accomplished on an a/c before the effective date of the AD, that a/c is not affected by the AD (see AD applicability). See also EASA answer to comment 4D.

Commenter 3: Deutsche Lufthansa AG – Stefan Hermes – 01/09/2021

Comment # 3



With this e-mail DLH would like to comment EASA PAD No. 21-113 issued at august the 4th. This PAD mandates the inspection of the double joggle area at frame 16 and 20 as per SBs A320-53-1373 and A320-53-1374.

A) In the reason of the PAD ALI Task 531133 is mentioned as crack finding source. However, this tasks describes the inspection of FR 4 and was deleted with ALS Part 2 Revision 03. DLH assumes that the correct task is 531153.

B) The last sentence of the reason paragraph states, that “This AD is considered interim action and further AD action may follow.”, could you please detail the way forward and confirm, that the embodiment of the optional terminating action iaw. the modification SBs will remain the terminating action for the applicable area.

C). DLH would like to request an additional paragraph in the credit sections, which confirms, that modifications iaw. the modifications SBs before the effective date of the AD will constitute terminating action for the repetitive SDI. If possible, please provide a feedback to this point before the final AD release, so that DLH could start with the modification campaign immediately.

EASA response:

3A) See EASA answer to comment 1B

3B) Based on available data, it is confirmed that following accomplishment of the mod SB, as specified in paragraph (8) of the AD, no additional inspection is required. Reference to “interim action” has been removed in the final AD.

3C) Actions accomplished before the AD effective date are acceptable under the clause “Required as indicated, unless accomplished previously”. See also EASA answer to comment 2B

Commenter 4: Delta Air Lines – James P. Thompson – 07/09/2021

Comment # 4

Reference: (A) EASA Proposed Airworthiness Directive: PAD No. 21-113, dated 04AUG21

(B) Airbus Service Bulletin (SB) A320-53-1373, dated 14JUN18

(C) Airbus Service Bulletin (SB) A320-53-1374, dated 14JUN18

(D) Airbus Service Bulletin (SB) A320-53-1378 Rev 01, dated 17SEP19

(E) Airbus Service Bulletin (SB) A320-53-1379 Rev 02, dated 13JAN21

(F) Airbus Service Bulletin (SB) A320-53-1380 Rev 01, dated 13SEP19

(G) Airbus Service Bulletin (SB) A320-53-1381 Rev 01, dated 18SEP19



ALI Tasks 531153 and 531155 have been used over time to accomplish inspections of the FR16 and FR20, LHS/RHS, double joggle area which is level with Door Stop #1 and Door Stop #7. Increased findings in these inspection areas prompted Airbus to develop and release several Service Bulletins – two of these bulletins (Ref (B) for FR16 LHS/RHS and Ref (C) for FR20 LHS/RHS) are for inspection of the double joggle area and supersede the above-mentioned ALI tasks. The remaining four Service Bulletins (Ref (D) for FR20 RH, Ref (E) for FR20 LH, Ref (F) for FR16 RH, and Ref (G) for FR16 LH) contain a recommended modification for each inspection area that strengthens the area via fastener hole oversizing and cold-working. After issuance of these SBs, Ref (A) was released to propose accomplishment of repetitive inspections per Ref (B) and Ref (C) and any follow on corrective actions resulting from inspection accomplishment. Accomplishing these actions will terminate the need to inspect the FR16 and FR20 double joggle area per the ALI Tasks 531153 and 531155. The subject PAD also proposes accomplishment of Ref (D) through Ref (G) as an optional terminating action modification for areas that were inspected with no findings. Additionally, this PAD addresses how previously repaired areas from ALI 531153 and 531155 accomplishment should be handled with regards to future inspection requirements.

DAL has reviewed the proposed rule, Ref (A), and the related Service Bulletins and has the following comments:

4A) The ‘Reason’ given in EASA PAD 21-113 states the following:

“During inspections accomplished in accordance with Airworthiness Limitation Item (ALI) tasks 531133 and 531155, cracks were detected in the affected areas.” ALI task 531155 accomplishes rototest inspections of the double joggle area at FR20, LHS/RHS and ALI task 531133 accomplishes inspections of the HFEC windshield lower side posts at FR4. It is clear that these tasks require inspections of entirely different parts of the aircraft, so it is likely that there is a typographical error. DAL believes that EASA intended to reference ALI task 531153, as this task accomplishes rototest inspections of the double joggle area at FR16 LHS/RHS and not the windshield lower side posts at FR4. Note that this belief is strengthened through review of the remainder of PAD 21-113 and the related SBs (Ref (B) through Ref (G)), which frequently call out ALI task 531153 and not ALI task 531133. DAL kindly requests EASA review whether or not the ALI reference in this paragraph requires updating. If EASA determines that this is the case, please revise the applicable paragraph from EASA PAD 21-113 ‘Reason’ as follows:

“During inspections accomplished in accordance with Airworthiness Limitation Item (ALI) tasks 531153 and 531155, cracks were detected in the affected areas.”

4B) The last sentence of the ‘Reason’ given in EASA PAD 21-113 states the following:

“This AD is considered interim action and further AD action may follow.”

DAL notes that compliance with the inspection requirements in EASA PAD 21-113 terminates the need for future ALI 531153 / 531155 inspection accomplishment and that there is an optional terminating action modification that can be utilized by operators as well per Ref (D) through Ref (G), as applicable to the affected area location. With this in mind, DAL requests clarification on how this proposed rule may only be an interim action instead of a final one. The statement quoted above prompts questions as follows:

a. Is it likely that the optional terminating action modification in this EASA PAD will be altered in a way that requires additional rework in the area if operators choose to accomplish the modification?



b. Given the potential interim nature of this EASA PAD (which includes the proposed terminating action), is it likely that a future AD will come out requiring inspections on modified areas of the aircraft, thus negating the modification serving as a terminating action?

4C) Para (3) of EASA PAD 21-113 addresses aeroplanes that have been inspected per ALI task 531153 / 531155 and were repaired using Airbus approved instructions. This paragraph makes compliance with Airbus repair approvals in the subject area mandatory and states that for repaired holes, accomplish (repetitive) inspections of each repaired fastener hole in accordance with and within the time period as specified in those Airbus approved repair instructions. DAL is wondering if it is possible that for the subject inspection area, Airbus approves repairs to affected holes as permanent with no follow on inspections? The current verbiage of EASA PAD 21-113 indicates that all repairs should have some sort of follow on inspection requirement. In the event that a repair is permanent with no repetitive inspections in the inspection area, complying with this paragraph could be difficult with the current verbiage. DAL kindly requests that EASA revise the verbiage in this paragraph as follows:

“For an aeroplane that has been inspected per ALI task 531153 or 531155, and repaired using Airbus approved instructions, accomplish ~~(repetitive)~~ inspections of each repaired fastener hole **as required by**, in accordance with, and within the time period(s) after repair, as specified in those Airbus approved repair instructions.”

Note that revising the verbiage in EASA PAD Para (3) as shown above may be more accommodating to operators in the event that either (1) repetitive inspections of repaired holes is required -OR- (2) a permanent repair in the inspection area was previously accomplished and no follow on repetitive inspections are required.

4D) Para (8) of EASA PAD 21-113 specifies that modification of the inspection area constitutes terminating action to the PAD’s repetitive inspections outlined in Para (1) if operators opt to accomplish it. This paragraph also specifies that the modification can only be done after having passed the inspection required by Para (1) with no crack findings. DAL understands this to mean the following: for an aircraft with no previously accomplished repairs from ALI tasks 531153 or 531155, modification can only be done in the event that there are no crack findings from the Para (1) inspection. However, DAL has some potential scenarios and questions regarding this:

a. Potential Scenario:

Certain fastener holes in the affected area were previously repaired after having been inspected from ALI 531155 or 531153, then un-repaired holes were inspected per Para (1) and no crack indications were found – are operators still authorized to accomplish the modification on un-repaired holes if Airbus approves the rework with an RDAF?

b. Potential Scenario:

The Para (1) inspection was accomplished and certain holes were found cracked so they were repaired per the Airbus repair drawing R53113041. Are operators authorized to accomplish the modification on un-cracked holes if the repair to the cracked holes and modification of the uncracked holes is approved by Airbus and covered in the RDAF?

EASA response:



4A) See EASA answer to comment 1B

4B) See EASA answer to comment 3B

4C) Comment agreed. Final AD has been amended using anyway a wording different from that proposed by the commenter. EASA policy is to limit the wording “as required by” to documents issued, or directly approved, by the Agency. The word “repetitive”, in brackets, is used to highlight that there may be a post repair one-time (non repetitive) inspection. “As applicable” has been added, to specify that there may be no post repair inspections.

4Da) This would require a partial accomplishment of the modification SB – which is not foreseen in the SB instructions. An AMOC application would be required to allow terminating the inspection of non repaired holes, modified iaw SB instructions.

4Db) A single repair instruction/RDAF, addressing both cracked and non-cracked holes, should be issued. Then, refer to paragraph (2) and (7) of the AD.

