

COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-132

[Published on 26 August 2021 and officially closed for comments on 23 September 2021]

Commenter 1: Swiss International Air Lines Ltd. – Jonas Graf – 30/08/2021

Comment # 1

The following written instructions within the PAD 21-132 do not fully reflect the content of the SB A330-53-3303 in our opinion:

“For the reasons described above, this AD requires **a one-time rototest inspection or, alternatively, DET or HFEC and ultrasonic inspection** for certain holes, and rototest inspection for certain other holes, and, depending on findings, accomplishment of applicable corrective action(s).

Required Action(s) and Compliance Time(s):

Required as indicated, unless accomplished previously:

Inspection(s):

- (1) Within the compliance times specified in Table 1 of this AD, accomplish a rototest inspection of the holes at the upper and lower door support fittings of FR67 and FR69 RH side, and the holes at door latch fitting of FR69 RH side in accordance with the instructions of the SB.
- (2) As an alternative to the inspection as required by paragraph (1) of this AD, within the compliance times specified in Table 1 of this AD and, thereafter, at intervals not to exceed the compliance times specified in Table 2 of this AD, accomplish the inspection A or B, as specified in Table 3 of this AD, in accordance with the instructions of the SB.”

As per SB A330-53-3303 Rev.00 (Task A330-A-53-XX-3303-06001-300A-A), a check of the aircraft records for the accomplishment of Service Bulletin No. Ref. SB A330-53-3275 revision 00 or revision 01 and from this SB has to be done as a first step (see SB extract):

“2. If the Service Bulletin No. Ref. SB A330-53-3275 revision 00 or revision 01 is already accomplished on aircraft:

a. Do a check of the aircraft records for the performance of rototest inspection during accomplishment of Service Bulletin No. Ref. SB A330-53-3275:

<1> **If the rototest inspection was performed on all holes during accomplishment of Service Bulletin No. Ref. SB A330-53-3275:**

<a> No further action.

<2> If the rototest inspection was not performed or is not known:



<a> Do an inspection of fuselage bulk cargo door frames at door support and latch fittings location, in accordance with Ref. Task set A330-A-53-XX-3303-01ZZZ-93BZ-A.”

The PAD does not mention or gives credit with regards to the aircraft records check if the rototest inspection was performed on all holes, which will result in no further actions as per applicable SB.

As per PAD the understanding, that is in all cases a one-time inspection (rototest or, alternatively DET or HFEC and ultrasonic inspection).

Request:

Please clarify this in the final AD to give credit towards the aircraft record check for the rototest inspection.

EASA response:

Comment acknowledged but not agreed. The AD does not explicitly require a records check to identify if the rototest inspection was done during accomplishment of Airbus SB A330-53-3275. However, this action is implicit and is reflected in the Applicability of the Final AD, where aeroplanes having accomplished these actions are excluded. So, for aeroplanes where it is confirmed that these actions were done, the AD does not apply and can therefore be recorded as ‘Not applicable’.

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

Commenter 2: Deutsche Lufthansa AG – Sarah Bender – 20/09/2021

Comment # 2

With regards to EASA PAD 21-132 DLH Engineering would like provide you some comments:

- A. **Applicability:** DLH Engineering asks for a review of the applicability statement of PAD 21-132. The PAD states that the requirements of the upcoming AD are not applicable for aircraft, which passed a roto-test **with no defect detected**.

There is the possibility that during SB A330-53-3275 embodiment, the roto-test had detected a crack or that a crack was also visible without roto-test in the beginning. Those aircraft are having dedicated RDAF with dedicated inspection instructions. Bushings in the repaired holes would need to be removed for a second roto-test, although already accomplished during SB A330-53-3275 embodiment and the risk to damage and widen the holes during bush removal.

In addition, as per SB A330-53-3303 accomplishment instruction, no further action is required for aircraft on which the roto-test inspection was performed on all holes and it is not differentiated between aircraft with a defect detected and those without any.



Please review the applicability. Aircraft which had a defect detected during the roto-test (not passed the roto-test - defect detected) should also be cleared from the applicability.

- B. **Reason Section:** In our opinion, the first sentences of this section are misleading. The CAA application was present at aircraft before MSN 400 and in order to reduce products with chromates due to Health and Safety Reasons, the TSA process was applied. It seems that the TSA will have a more critical effect compared with the CAA procedure, which end up in a higher threshold for the inspection. A better wording could be:

“In the frame of the certification of the A330 Extended Service Goal exercise, it was identified that Tartaric Sulfuric Anodising (TSA) or Chromic Acid Anodising (CAA) surface treatment is present in some frame holes, which could lead to a detrimental effect on fatigue behaviour. On A330 bulk cargo door frames (FR) 67 and FR69 right hand (RH) side, the door fitting attachment holes have this CAA treatment up to MSN 399, and from aeroplane MSN 0400 and later MSN the TSA treatment was applied.”

- C. The last sentence of this section is also misleading with the statement of the one-time roto-test against the roto-test for certain holes. Our assumption is that holes which had a roto-test inspection will not need another inspection.
- D. **Inspection(s) Section:** We recommend to combine §(2) table 2 and table 3 to reduce the complexity and to reduce the possibility of mistakes while intermixing. Proposal for a combined table:

Table 2 Alternative Inspection			
Action/ Area(s)	Affected Aeroplanes	Inspection Interval (FC or FH whichever occurs first)	Method and area(s) to be inspected
A	ALL	150 FC	DET for frame around the fittings from the visible side i.e. looking forward for FR67 and looking aft for FR69
		or	
B	A330 (except -200F)	SR: 1 700 FC or 6 100 FH LR: 1 400 FC or 8 400 FH	HFEC and ultrasonic inspection for upper door support fitting holes, rototest for lower door support fitting holes and HFEC for door latch fittings at frame FR69
	A330-223F and A330-243F	1 700 FC or 5 200 FH	

- E. **Corrective Action(s):** Not only after roto-test inspection as per §(1) but also after the roto-test of the lower door support fitting holes as per §(2), the installation of new bushes is required.
- F. **Terminating Action:** It should better be clearly stated that the complete roto-test inspection in accordance with the instructions of the SB as per §(1) constitutes the terminating action for the repetitive inspections as specified in §(2). Otherwise it might be misinterpreted that the roto-test of the



lower door support fitting holes as per §2 terminates the requirements as this roto-test is also accomplished in accordance with the instructions of the SB.

EASA response:

- A. Comment agreed. The exclusion statement is now also valid for aeroplanes that accomplished the SB and defects were corrected.***
 - B. Comment partially agreed. CAA and TSA treatments have been clarified in the sentence but Airbus confirmed that no surface treatment was applied in the same frame attachment holes for aeroplanes MSN 0001 to MSN 0399.***
 - C. Comment not agreed. It is correct that the required inspection must not be done on all aeroplanes. But, considering the Applicability and the exclusion statement, all “affected” aeroplanes must be inspected. See also EASA answer to Comment #1 above.***
 - D. Comment agreed. Table 2 and 3 in PAD 21-132 are now merged into a single Table 2 in the Final AD.***
 - E. Comment agreed. Installation of new bushes was an implicit requirement in the PAD. That is now explicit in the AD for aeroplanes that accomplished the alternative inspection with no findings.***
 - F. Comment agreed. The reference to paragraphs (1) and (3) has been added to the Terminating action paragraph.***
- No changes have been made to the Final AD in response to point C of this comment.***

