

COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-184

[Published on 21 December 2021 and officially closed for comments on 18 January 2022]

Commenter 1: The Emirates Group – Mohamed El Basri – 22/12/21

References:

A/. PAD 21-184 .

B/. SB 54-8102 R00 .

C/. SB 29-8026 / related to MOD No. 74407

D/. SB 29-8035 / related to MOD No. 76027

Ref./A/ PAD 21-184 has been reviewed and below are listed Emirates enquiries/ comments:

Comment A: (Applicability)

- Airbus has revised Ref./C/ & Ref./D/ to include MSN: MSN 0162 and MSN 0167 (EK aircraft)
- Records are showing that MSN 0162 and MSN 0167 are both post-mod 74407.
- SB 54-8102 is only applicable to aircraft on which MOD No. 74407 T80854 (Service Bulletin No. A380-29-8026) or MOD No. 76027 T80948 (Service Bulletin No. A380-29-8035) are embodied.
- Ref. /A/ PAD 21-184 is referring to occurrences reported of clogged pylon drain systems on A380 aeroplanes fitted with Rolls-Royce Trent 900 engines, causing significant contamination of pylon box and engine core with hydraulic fluid. In each case, investigation results revealed that incorrect in-service installation of hydraulic mixed pipes in accordance with Ref. /C/ Airbus SB A380-29-8026 or Ref. /D/ Airbus SB A380-29-8035, combined with an incorrect torque of the hydraulic B-nut connections, most likely caused the hydraulic fluid leakage and subsequent contamination.
- We can understand that the issue is affecting in-service fleet due to incorrect installation during embodiment of SB A380-29-8026 or Airbus SB A380-29-8035, which doesn't apply to MSN 0162 and MSN 0167, since the SBs were NEVER EMBODIED on these two A/C.
 - Please confirm MSN 0162 and MSN 0167 (both post-mod 74407 but never had in-service Airbus SB A380-29-8026 or Airbus SB A380-29-8035) are not affected by PAD 21-184 and the related potential Airworthiness Directive.

- As both A/C MSN 0162 and MSN:0167 are post-mod 74407, could you please clarify why Airbus has revised Ref./C/ and Ref. /D/ to include these two aircraft in the Effectivity?

Comment B: (Compliance)

- In Table 1 Compliance Time A, 2200 Flight Cycles (FC) is to be considered as Total Accumulated FC (since first flight)?
- In Table 1, Compliance Time A gives only 100 FC after date of Ref. /C/ and Ref. /D/ accomplishment within 2200 FC whereas Compliance Time B provides 3000 FC not be exceeded after date of Ref. /C/ and Ref. /D/ within 800 FC after EASA AD effective date.
- Could you confirm that both limits 100 FC and 3000 FC are correct?

UPDATE dated 27 January 2022

Please be advised that we have requested some additional clarifications to Airbus through a tech request 81016226.

Airbus reply /003 has confirmed that MSN 162 & 167 will be removed from SB54-8102 effectivity as did not embody SB29-8026 or SB 29-8035.

SB54-8102 will be revised to update the effectivity in accordance.

As for now, SB54-8102 includes MSN 162 & 167 in the effectivity, UAE would like to know if the coming EASA AD will be applicable to MSN 162 & 167? If no, how can ensure compliance to the EASA AD waiting for SB 54-8102 revision?

EASA response:

A. Comment acknowledged. After clarifications with Airbus it has been confirmed that Airbus modification 74407 was indeed applied in production on certain aeroplanes, such aeroplanes are therefore considered not affected by the unsafe condition addressed by the AD. To reflect this, an exclusion statement for aeroplanes having Airbus modification 74407 was inserted in the Final AD.

B. Comment acknowledged. Table 1 Compliance time A provides a window for accomplishing the inspection required by paragraph (1) of the Final AD. The values of 100 FC and 2 200 FC are not to be accounted for from aeroplane first flight but from embodiment of Airbus SB A380-29-8026 or SB A380-29-8035, as applicable. The 100 FC lower limit is to make sure that the inspection is not accomplished too early, and 2 200 FC is the upper value for accomplishing that inspection. As for the compliance time B, it is a grace period for aeroplanes that already have accumulated more 2 200 FC since embodiment of Airbus SB A380-29-8026 or SB A380-29-8035.

The Final AD has been amended in response to Comment A.

