

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-018

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### Commenter 1: Delta Air Lines – Elijah Weinstein – 23/03/2022

#### Comment # 1

Reference:

- (A) EASA Proposed Airworthiness Directive: PAD No. 22-018, dated 24 Feb 22
- (B) Service Bulletin: A350-53-P071, dated 20 Jan 22
- (C) Service Bulletin: A350-53-P058, dated 20 Jan 22
- (D) TR: 81031869\_003, dated 25 Feb 22
- (E) TFU: 53.50-00008, dated 08 Mar 22

#### Comment # 1A

##### Commenter Request

The inspection Service Bulletin, A350-53-P071, contains incorrect ASR Tasks references in the procedure to remove the Fastener affected at FR96, RH Side. DAL requests to allow the use of the correct ASR Task when accomplishing the inspection Service Bulletin, A350-53-P07 as follows:

In A350-53-P071 section 3.C (1) Remove the Fastener affected at FR96, RH Side, Part (a) 2 use ASR A350-A-51-42-XX-01ZZZ-667Z-A instead of ASR A350-A-51-77-11-00ZZZ-660Z-A.

##### Request Justification

During review of Ref (B) DAL determined task 3.C. Part (a) 2 had the wrong ASR Ref. The Step calls out “Ref. A350-A-51-77-11-00ZZZ-660Z-A” which is for material handling and preparation – skin cleaning procedures, not fastener installation and removal. The step should call out Ref. ASR A350-A-51-42-XX-01ZZZ-667Z-A for fastener installation and removal. Airbus confirmed this with Ref (D) TR.

##### List paragraphs that change; describe (non-obvious) changes

Add sentence to ref (B) para 1 to spell out this correction unless the Airbus Inspection SB is revised to incorporate this correction.



**Comment # 1B****Commenter Request and Request Justification**

Technically the EASA PAD requires completion of the modification service bulletin twice. Ref (A) PAD required action(s) and compliance time(s) para 1 requires ref (B) SB be complete, and pages 16 and 17 call for accomplishment of the modification SB ref (C). Then para (2) requires the modification service bulletin be complete again.

**List paragraphs that change; describe (non-obvious) changes**

Para 1 of Ref (A) PAD should state “accomplish section 3 of the inspection SB except for the completion of the modification SB. (Note: Modification SB will be accomplished in paras (2) and (3).)”

**Comment # 1C****Commenter Request**

A strict interpretation of the phrase “in accordance with the instructions of the modification SB” in para (2) of the ref (A) PAD would require the removal of the fasteners twice, once in the inspection SB ref (B) and again in the modification SB ref (C).

**Request Justification**

By reading para (2) of ref (A) PAD we believe EASA’s intent was to only require removal of the affected parts in the inspection SB ref (B). However, clarification is needed to avoid interpretation confusion.

**List paragraphs that change; describe (non-obvious) changes**

- Delta recommends para (2) of ref (A) PAD states the following: “If, during the inspections as required by paragraph (1) of this AD, no damage is found, before next flight, install new fasteners and nuts with adapted aluminium washer in accordance with the instructions of section 3 of the modification SB. (Note: Since the affected parts are removed in the inspection SB, removal of the affected parts per the modification SB is not required.)”

**Comment # 1D****Commenter Request**

The Modification Service Bulletin, A350-53-P058, contains incorrect steps to measure the gap and install shim after the wet installation as confirmed by Airbus in (E) TFU: 53.50-00008, ref /E/. DAL requests to allow the use of the correct step sequence per TFU: 53.50-00008.

**Request Justification**

Airbus acknowledged the Ref (C) SB as unworkable in the Ref (E) TFU and provided step deviations to accomplish the unworkable steps as shown below:  
Ref (E) TFU states the following:



Additional Clarification on MSB A350-53-P058-00 Workstep

As per A350-A-53-XX-P058-01ZZZ-720Z-A, the work sequence is given as

- Para(c) fastener wet installation
- Para(d) gap measurement and installation of shim
- Para(e) torque tighten the nut.

After investigation, this work sequence is not possible: it is impossible to measure the gap and install shim after the wet installation.

Please be informed that the correct work sequence is the following:

- Temporarily install the bolt-nut-washer
- Gap measurement (then remove the fasteners)
- Wet install the bolt-nut-washer (and shims, if required)
- Torque tighten the nut

This work sequence will be updated in the MSB A350-53-P058 at the next opportunity. Pending this update, operators have to request a FOC RDAF to get the approved documentation justifying the SB deviation with the correct work sequence.

List paragraphs that change; describe (non-obvious) changes

Or add note in required actions of the required action(s) and compliance time(s) paras (2) and (3) to add the following note.

“Note: Except as specified the additional clarification section of TFU 53.50.00008.”; unless the Airbus Modification SB is revised to incorporate this correction.

**EASA response:**

**Comment 1A: Comment noted. EASA contacted Airbus and it is confirmed that there is a the typographic mistake in ISB A350-53-P071 with the ASR reference. Airbus will correct the typo in the next revisions of the SBs. No changes have been made to the Final AD in response to this comment.**

**Comment 1B and 1C: Comment not agreed. The (P)AD paragraph (1) requires to “remove and inspect”, while paragraph (2) and (3) require to “install new fasteners” or to “accomplish corrective actions” iaw the instructions of the SBs. The PAD does not require “accomplishment of the SBs”. EASA consider that the proposed wording properly clarifies the intent of the required actions. No changes have been made to the Final AD in response to this comment.**



***Comment 1D: Comment noted. EASA contacted Airbus and it is confirmed that work sequence is incorrect as indicated in MSB A350-53-P058. Airbus will correct the the correct work sequence in the next revisions of the SBs; meanwhile RDAF can be issued by Airbus providing clarifications. No changes have been made to the Final AD in response to this comment.***

