

COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-028

[Published on 18 March 2022 and officially closed for comments on 01 April 2022]

Commenter 1: Delta Air Lines – Cecilia Teeuwen – 01/04/2022

Reference:

- (A) EASA Proposed Airworthiness Directive: PAD No. 22-028, dated 18 March 2022
- (B) Airbus Alert Operators Transmission – AOT A26P005-21 Rev 00, dated 17 March 2022
- (C) Rolls-Royce Service Bulletin TRENTXWB-26-AK834, dated 09 March 2022
- (D) Rolls-Royce Service Bulletin TRENTXWB-26-AK835, dated 10 March 2022

Comment # 1A

Commenter Request

Modify PAD No. 22-028, Ref (A), Applicability paragraph, from “Airbus A350-941 and A350-1041 aeroplanes” to Trent XWB-XX Engines prior to Serial No. 21944.

Request justification

PAD No. 22-028 required actions and compliance times are applicable to affected engines. At any point an applicable engine could be replaced with an engine serial number that is not applicable per Ref (C) which would change the compliance status of the A/C.

List paragraphs that change; describe (nonobvious) changes

Applicability:

- TRENT XWB-XX Engines prior to Serial No.21944, except Engines with serial numbers listed in Appendix 1 of the Rolls-Royce NMSB, as applicable.

Comment # 1B

Commenter Request

Clarify PAD No. 22-028, ref. /A/, regarding mandatory inspection findings reporting. Documentation of inspection is required per Rolls-Royce NMSB: Rolls-Royce Alert NMSB TRENT XWB 26-AK834 (for A350-941), Ref (C).



Required for Compliance step or if it's part of data collection by RR.

Typically, reporting is needed from operators to determine root cause of the issue and a final corrective action. In PAD No. 22-028, ref. /A/, the final corrective action of the issue is already addressed by Rolls-Royce Alert NMSB TRENT XWB 26-AK834 (for A350-941), Ref (C).

Request justification

Required for Compliance (RC) Paragraph 3.A.1.b.i., 3.A.2., 3.B.1.c., and 3.B.2.a.i. of Rolls-Royce Alert NMSB TRENT XWB 26-AK834 (for A350-941), Ref (C) contains instructions to record findings in Appendix 2 and to submit them to RR.

DAL is requesting clarification on whether this step is in fact a

List paragraphs that change; describe (nonobvious) changes

- New clarification Note to be added to PAD No. 22-028, ref. /A/.

Comment # 1C

Commenter Request

Modify PAD No. 22-028, ref. /A/, Inspection(s) paragraph, Note 1 to apply to the engines installed at the time of the procedures identified in the Note in Paragraph 1 of the AOT, ref (B).

Request justification

The Note under Paragraph 1 of Ref (B) states that inspection is not required on aircraft on which MP Task Ref.1. of the AOT (MP TASK A350-A-26-21-XX-00001-340A-A) was performed without any engine change afterwards. DAL argues that the accomplishment of the function test per MP Task Ref.1. of the AOT, that engine has complied with the requirements of PAD No. 22-028 paragraph (1) and (2).

List paragraphs that change; describe (nonobvious) changes

- PAD No. 22-028 Required action: Inspection(s) Note 1: revise to explicitly state that accomplishment on an aeroplane or engine of one of the procedures identified in the Note in Paragraph 1 of the AOT, is acceptable to comply with the requirements of paragraph (1) and (2), as applicable, of this AD.

Comment # 1D

Commenter Request

Modify PAD No. 22-028 Ref. Publications paragraph to include the Rolls-Royce NMSB: Rolls-Royce Alert NMSB TRENT XWB 26-AK834 (for A350-941) and NMSB TRENT XWB 26-AK835 (for A350-1041), as applicable, Ref (C) and Ref (D).

DAL also requests that all later approved revisions of Ref (C) and Ref (D) be acceptable for compliance with the requirements of this proposed AD.

Request justification



Airbus AOT A26P005-21 original issue dated 17 March 2022, Ref (B) is currently listed in the Ref. Publications paragraph. Ref (B) instructs operators to complete the inspection in accordance with the Rolls-Royce NMSB, Ref (C) and Ref (D). Adding these documents to the Ref. Publications along with approval for all later revisions of both documents will allow operators to complete the inspections as required.

List paragraphs that change; describe (nonobvious) changes

- Add Rolls-Royce Alert NMSB TRENT XWB 26-AK834 (for A350-941) and NMSB TRENT XWB 26-AK835 (for A350-1041), as applicable, Ref (C) and Ref (D) to the Ref. Publications paragraph of PAD No. 22-028.

EASA response:

Comment 1A: comment not agreed. While EASA agrees that actions are required on the engine, the affected system (fire extinguisher system) has been designed to Aircraft Certification Specification CS25 (see also Approval Section of the Rolls-Royce NMSB). To be noted that, following installation of an engine, the applicable AMM procedures requires the flushing of fire extinguishing lines, so preventing that the possible unsafe condition migrate to other aeroplanes.

Comment 1B: Comment noted. "RC marking" is not called for in the AD, the AD requires only inspection and, depending on findings, corrective actions. No reporting is required by the AD.

Comment 1C: Comment not agreed: the AD does not require actions on engine in shop. See also EASA answer to comment 1A.

Comment 1D: Comment agreed. Final AD has been amended accordingly.

No changes have been made to the Final AD in response to comments 1A, 1B and 1C.

Commenter 2: Idris Coban – Deutsche Lufthansa AG – 01/04/2022

Comment # 2

To avoid misunderstanding please revise paragraph (1) and (2) to tell, that the applicable RR NMSB to be used as leading document to carry out inspections and corrective actions.

The range of applicability is defined by RR NMSB, so it should be allowed to use RR NMSB as basis for the inspection.

By using the RR NMSB, the tracking and reporting would be done on Engine Serial Number Level not MSN. The PAD is talking about the inspection to be done on all MSN. Is there any expectation concerning the reporting or compliance method?

EASA response:



***Comment not agreed. The AD requires actions at aircraft level. See also EASA answers to Comment 1A and 1C; and to Comment 1B (for reporting).
No changes have been made to the Final AD in response to this comment***

