

COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-029

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Commenter 1: Delta Air Lines – James Thompson – 19/04/2022

Comment # 1

References:

(A) Airbus Service Bulletin (SB) A350-57-P069, dated 16 Nov 21

(B) Airbus TR 81050077/005, dated 08-Apr-2022

Comment # 1A

Change the language of the applicability paragraph from description of certain modifications to more concise language of “per SB effectivity”.

The PAD uses the following language to define applicability “Airbus A350-941 and A350-1041 aeroplanes, all manufacturer serial numbers, except those on which Airbus modifications 116348 and 116559 have been embodied in production”.

It is unclear if the language “116348 and 116559” implies that each aircraft requires both modifications to remove effectivity or is one of the two modifications enough to remove effectivity. In contrast, the language in the SB references to effected MSNs (As opposed to modification numbers) which is clearer and less open to subjective interpretation.

For these reasons DAL requests to change the language of the applicability paragraph to “per SB effectivity”.

Comment # 1B

Add a note to the Modification paragraph of the EASA AD to provide clarification for stripping as preparation for electrical bonding in paragraph 3.C as per Airbus TR 81050077/005.

In the current version of the SB, paragraph 3.C describes "Do a stripping diameter of 22 mm (0.866 in) on the front spar bracket, item (20) and Metallic Bonding Network (MBN) strip item (21), refer to Ref. Fig.BB Replacement of the fasteners on the Front Spar." This language which is referenced several times within this R.C. paragraph is unclear and has no referral to relevant manuals or procedures. A TR (attached) was sent to Airbus for clarification.



The TR response referenced MP A350-A-20-51-20-04ZZZ-264Z-A as a guide to perform the step. This task refers to “Stripping of Painted Metal Parts with a Metallic Brush.” The EASA AD should provide clarification regarding this step.

Recommend adding the following Note to the Modification paragraph of the EASA AD: Note: Where the SB refers to doing a stripping diameter of 22 mm, this AD adds these instructions as clarification: "Using a metallic brush, strip paint within a diameter of 22 mm (0.866 in) around the front spar bracket, item (20) and Metallic Bonding Network (MBN) strip item (21), refer to Ref. Fig.BB Replacement of the fasteners on the Front Spar and MP A350-A-20-51-20-04ZZZ-264Z-A."

This change would apply to stripping diameters of 24 mm (0.945 in) and 25 mm (0.984 in) as well. Each stripping diameter should include a tolerance of ± 5 mm (0.2 in).

Comment # 1C

Add a note to the Modification paragraph of the EASA AD to provide clarification for the term “clipping of headcaps” in paragraph 3.C as per Airbus TR 81050077/005.

In the current version of the SB, there is a NOTE in paragraph 3.C which describes "This will make the clipping of the headcaps, item 48, and the shoulders of the washers, item 42." This language which is referenced several times within this R.C. paragraph is unclear and has no referral to relevant manuals or procedures. This is not a complete sentence and therefore is unclear. A TR (attached) was sent to Airbus for clarification. The TR response explains the importance of correct washer installation direction (thicker cross-section under the head of the fastener) to allow for secure installation of the headcap and to ensure that the headcaps “click” into place over the shoulders of the washers. The EASA AD should provide clarification regarding this step.

Recommend adding the following Note to the Modification paragraph of the EASA AD: Note: Where the SB refers to “clipping of the headcaps” this AD adds these instructions as clarification: "The washers, item 42, are installed below the bolt heads, item 34, with the shoulders of the washers (thicker cross section), item 42 on the bolt head side. This will allow for the headcaps to be securely installed over the shoulders of the washers, “clicking into place” when both the washer and headcap are installed correctly.

Comment # 1D

Add a note to the Modification paragraph of the EASA AD to correct call out item numbers 10 and 15 in paragraph 3.C as per Airbus TR 81050077/005. Within paragraph 3.C item 10 is called out when actually referring to item 15 (fitting). This incorrect call out has been confirmed by Airbus as per Airbus TR 81050077/005.

Recommend adding the following Note to the Modification paragraph of the EASA AD: Note: “Item 10” being called out incorrectly instead of “item 15” (fitting) within paragraph 3.C. (configuration 1 and 4).



Comment # 1E

Add a note to the Modification paragraph of the EASA AD to include protective treatment on item 45 (nut) for Configuration 1 in paragraph 3.C as per Airbus TR 81050077/005.

Within paragraph 3.C no protective treatment step is provided for item 45 (nut). This omission has been confirmed by Airbus as per Airbus TR 81050077/005. Item 45 does require protective treatment.

Recommend adding the following Note to the Modification paragraph of the EASA AD: Note: Protective treatment step for item 45 (nut) in configuration 1 of paragraph 3.C is required as follows: “Apply protective treatment to the nuts, item 45, from inside the CWB, refer to Ref. Appendix SURFACE PROTECTIVE TREATMENT, use: Polysulfide Sealant – Fuel Tank Brushable 06ABA1”.

EASA response:

Comment 1A: while EASA does not agree that the language is “unclear” (“116348 and 116559” implies that both modifications are required on an aeroplane to make that aeroplane not affected by the AD), to increase readability of the AD, all affected MSN, as listed in the SB, have been listed in the Applicability section.

Comments 1B, 1C, 1D and 1E: comment noted. It is EASA policy not to include such detailed instructions in an AD, unless needed due to prevailing considerations. To be noted that, per remarks #5 of the AD, operators may contact Airbus for any clarification regarding the technical content of the requirements of the AD; it is also noted that these comments have been provided to Airbus, and that they will be taken into account for a possible SB revision, which would be acceptable for compliance with the requirements of the AD. No changes have been made to the Final AD in response to this comment.

