

COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-052

[Published on 06 May 2022 and officially closed for comments on 03 June 2022]

Commenter 1: HiFly – Rui Cavaco – 06/05/2022

Comment # 1

Please consider to replace Kidde Aerospace & Defense SB CFD-26-3 original issue dated 13 January 2022 by Kidde Aerospace & Defense SB CFD-26-3 Revision 1 dated 29 March 2022.

EASA response:

Comment partially agreed: The changes introduced in Kidde Aerospace & Defense Vendor Service Bulletin (VSB) CFD-26-3 Revision 1 do not modify the list of P/N affected (only a duplicated P/N is removed), or the proposed procedure (only Zeq(calc) reference is added for traceability with the datasheet). Therefore, both VSB CFD-26-3 original issue and Revision 1 are acceptable for compliance with the AD. The Final AD has been amended to add VSB CFD-26-3 Revision 01.

Commenter 2: ALL NIPPON AIRWAYS CO.,LTD. (ANA) – Ryo Kodama – 18/05/2022

Comment # 2

Detailed inspection is required for Group 1, and Group 1 and 2 are defined in the PAD as below.

“Group 1 aeroplanes are those that have an affected part installed at an affected position.

Group 2 aeroplanes are those that do not have an affected part installed at any affected position.

An aeroplane having an MSN not listed in Section 1.A of the SB is Group 2, provided it is determined that no affected part has been installed on any affected position of that aeroplane since Airbus date of manufacture.”



Therefore, this can be interpreted that detailed inspection is not required for an aeroplane which is not listed in the Section 1.A of the SB (A320-36-1085 or SB A320-36-1087) since the affected part is not installed on them since Airbus date of manufacture.

However, after the date of manufacture and delivery to operators, there should be a possibility that an affected part at an affected position is replaced before this PAD issuance (or future AD issuance).

In such a case, even if an aeroplane is not listed in the Section 1.A of the SB, such an aeroplane becomes Group 1 from Group 2.

In another words, as long as overheat detection system sensing elements at affected positions have not been replaced since the date of manufacture, an aeroplane which is not listed in the Section 1.A of the SB remains as Group 1.

ANA would like to clarify if this interpretation for Group 1 & 2 is correct, and a method to determine Groups.

Queries:

1. Please confirm if the above interpretation for Group 1 & 2 is correct or not. Please correct us if we are wrong.
2. Please confirm if it is acceptable to use operators' maintenance records or some other similar documents to determine if an affected part is installed at an affected position or not.

EASA response:

1. ***Comment agreed. An aeroplane which is not listed in Section 1.A of the SB, and for which it can be determined that no affected part has been installed at an affected position after delivery from Airbus, is Group 2.***
2. ***Comment agreed. Any method is acceptable to determine whether an affected part is installed at an affected position, provided that method is reliable. Where such determination must be made using a specific method (e.g. inspection), that method would be required through a dedicated paragraph in the AD.***

No changes have been made to the Final AD in response to these comments.

Commenter 3: Etihad Airways – Gopinath Paulnadar – 30/05/2022

Comment # 3

Ref:

1. EASA PAD 22-052
2. VSB CFD-26-3.



This PAD is issued because of a quality issue on the OHDS sensing elements listed in VSB CFD-26-3.

The AD states the affected part as below:

“Affected part: Overheat detection system (OHDS) sensing elements, also identified as ‘Continuous Fire Detector’, having a Part Number (P/N) and corresponding date code as listed in Section 1.A of the VSB, except those that passed an inspection (no discrepancies found; one face of the connector hex nut is marked) in accordance with the instructions of Section 3 of the VSB.”

The PAD also states the affected position is only (FIN) 34HF, FIN 35HF, FIN 61HF and FIN 62HF.

There are many other P/N listed in the VSB but not installed in the affected locations.

In this regards, can we assume that even if the part number of the OHDS sensing element is listed in VSB but FIN number is not tagged as affected by AD, then the sensing element is not affected?

Example:

Sensing element P/N 35546-2-255 FIN 36HF on A320 aircraft is listed in VSB CFD-26-3. However, the FIN is not listed as affected position by PAD.

WE request EASA to confirm if this P/N 35546-2-255 at FIN 36HF affected by VSB CFD-26-3 is considered as affected part or not.

EASA response:

Comment agreed. The unsafe condition has been determined to exist for installations of the affected parts at the affected positions. Therefore, the AD only requires actions for affected parts when they are installed at one of the affected positions as defined in the AD.

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

Commenter 4: United Airlines – Chloé Shen Morosetti – 01/06/2022

Comment # 4

As stated in the PAD, “An aeroplane having an MSN not listed in section 1.A of the SB is Group 2, provided it is determined that no affected part has been installed on any affected position of that aeroplane since Airbus Date of manufacture”.

United Airline has 150+ aeroplane are not listed in section 1.A of the SB, only 30 aeroplanes within United’s fleet are affected by the PAD/SB by effectivities listed in the SB. However, the AD has also mentioned that some of the OHDS sensing elements produced before 31 January 2021 were found with the defect. Our 150+ aeroplanes were delivered 15+ years ago, that was many years before 2021. Furthermore, we have no way to verify if



any new OHDS sensing elements have been installed after 31 January 2021, therefore, we have to inspect the whole fleet per the SB which is almost 200 aeroplanes.

- Firstly, United Airlines would like that EASA and Airbus become aware of the impact to our fleet and operation of this rule has on our entire fleet which is a lot larger than just 30 aeroplanes.
- Secondly, United Airlines has a question to Airbus: If some of the sensing elements made before 31 January 2021 are in question, why don't all aeroplanes made before that date fall within the effectivity list of the SB? Is the current effectivity list accurate?
- Thirdly, a question to EASA: Based on my comment earlier, do you agree that we have to incorporate this SB to all of our A320s?
- Forthly, in the PAD, it directs us to contact account.airworth-eas@airbus.com for any technical content questions. However, this email address is no longer valid. Please verify the email address and also forward our questions to Airbus.

EASA response:

- **First comment noted. EASA and Airbus are aware of the impact to the overall flying fleet and fully acknowledge the impact to the operation of United Airlines' fleet.**
- **Second comment noted. Airbus has identified all aeroplanes delivered from FAL that may have installed parts impacted by the OHDS Notice of Escape in accordance with the information provided by Kidde Aerospace & Defense in its VSB CFD-26-3, which as per section 1.C.(1)(a) limit to "... sensing elements produced between November 24, 2004 and January 31, 2021..."**
- **Third comment disagreed. An aeroplane which is not listed in Section 1.A of Airbus SB A320-36-1085 or SB A320-36-1087, and for which it can be determined that no affected part has been installed at an affected position after delivery from Airbus, is Group 2. Therefore, it does not need to apply this SB. Any method is acceptable to determine whether an affected part has been installed at an affected position after delivery from Airbus, provided that method is reliable. For example:**
 - a) **Any new OHDS sensing element installed at an affected position after delivery from Airbus is a potentially affected part and needs to be inspected unless e.g. maintenance records identify its date code and it is A2105 or posterior.**
 - b) **Any new OHDS sensing element installed at a non-affected position after delivery from Airbus is a non-affected part and, therefore, does not need to be inspected.**
- **Fourth comment disagreed. Airbus confirm that the email address account.airworth-eas@airbus.com is valid.**



Commenter 5: Lufthansa Technik AG – Szabolcs Kövesi – 01/06/2022**Comment # 5**

LHT reviewed PAD 22-052, and recommends to replace the wording “detailed inspection” to “special detailed inspection” in section ‘Reason’. Additionally recommends to replace the abbreviation “DET” to “SDI” in section ‘Reason’ and Inspection: §(1).

Reason being that the related SBs A320-36-1085 and -1087 require special detailed inspections of certain OHDS Sensing Elements performed by heat gun.

EASA response:

Comment agreed. In the Final AD, the Reason paragraph has been amended accordingly to refer to ‘special detailed inspection (SDI)’.

