

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-063

[Published on 25 May 2022 and officially closed for comments on 22 June 2022]

**Commenter 1: Lufthansa Technik AG – Rene Schinkel – 13/06/2022**

### Comment # 1

[The] “Qualified Shop visit” Definition is incorrect, as module 51 rework is missing (please see screenshot below). I would prefer to directly make reference to the Refurbishment/Overhaul Definition in RR Generic EMP document number RM1966 (Trent XWB-75 to -84) and RM2060 (Trent XWB-97) document, latest revision.

#### 5.3.4. Engine ‘Refurbishment’ Shop Visit

A package of work in accordance with the appropriate EMP section to be accomplished as a minimum:

1. Module 41 Refurbishment (Level 3)
2. Module 51 Refurbishment (Level 3)

#### 5.3.5. Engine ‘Overhaul’ Shop Visit

A package of work in accordance with the appropriate EMP section to be accomplished as a minimum:

1. Module 41 Overhaul (Level 4)
2. Module 51 Overhaul (Level 4)

### EASA response:

**Comment agreed. The definition of the Engine Refurbishment shop visit in the AD was taken from NMSB 72-AK188 which includes compliance at module level 3 and level 4. EASA agrees that this could be specified more clearly.**

**In the Final AD, the definition of a qualifying shop visit has been amended to “An engine shop visit where the high pressure module is undergoing a Level 3 or Level 4 workscope”.**



**Commenter 2: Delta Air Lines – James Thompson – 17/06/2022****Comment # 2**

**Commenter Request:** Modify the Corrective Action(s) in the Required Action(s) and Compliance Time(s) section to include the replacement of the OGV outer mount ring with a serviceable part.

**Request justification:** The proposed language for the Corrective Action(s) requires the OGV outer mount ring to be replaced with a new part, or, depending on findings, accomplish a repair as specified in the NMSB. This proposed corrective action does not allow any serviceable material to be installed. A serviceable used outer mount ring (SUM) would have been inspected per the engine manual tasks and/or the NMSB and deemed serviceable. Per the current proposed language, no SUM material can be installed on the engine if the original OGV outer mount ring assembly exceeds the accept criteria of NMSB. A SUM outer mount ring that is deemed serviceable per the engine manual and/or the NMSB should offer equivalent level of safety to a new or repaired original outer mount ring per the NMSB. Allowing the use of SUM material could potentially help shop turn around time and allow engine to return to service sooner.

List paragraphs that change; describe (nonobvious) changes

Definitions:

- New Definition for “serviceable parts” including new, repaired original outer mount ring or serviceable used outer mount ring and refer to the “serviceable part” in the Corrective Action (s) paragraph; or

Corrective Action(s)

- Allow the use of serviceable outer mount ring as an accepted corrective action.

**EASA response:**

**Comment agreed. The RR NMSB instructs to reject or repair the part (as necessary) and does not prevent the use of serviceable used material.**

**The Final AD has been amended to state ‘replace the OGV outer mount ring assembly with a serviceable part...’.**



**Commenter 3: Singapore Aero Engine Services Pte Ltd – Malek Aziz – 22/06/2022****Comment # 3**

Qualified shop visit: Engine refurbishment shop visit (Level 3 or 4 on the high-pressure system module).

In the RR Engine Maintenance Program (EMP), the engine is considered to be on a refurbishment shop visit if the high pressure system and intermediate pressure turbine modules are on Level 3 or 4.

Is the AD in line with the EMP or as long as the High pressure system module is on level 3 or 4, constitutes a qualified shop visit even though the intermediate pressure turbine module is on Level 1 or 2?

**EASA response:**

**Comment agreed. See EASA answer to Comment #1 above.**

