

COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-083

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Commenter 1: Qantas Airways Limited – Bruce Russell – 22/07/2022

Comment # 1

QFA propose for the removal of the 72 Month Compliance period. Refer to the following:

The manufacturer of the Thrust Reverser Unit (TRU) supports the serviceability of the TRU Intermediate Frame Fittings for 9000 flight cycles.

The TRU serviceability is also supported in operation by the routine zonal inspections with intervals of 36 months as stated by A380 MPD.

These inspections have previously identified cracking in the Intermediate frame fittings for QFA TRU's. The cracked fittings are then replaced on-wing using the same P/N as specified via the manufacturers SI document.

Compliance with the proposed modification within the 9000 flight cycle life is the preferred approach for managing the TRU in operation.

To support this proposal, introducing an inspection of the TRU Intermediate frame fittings at shorter intervals could be established, and where defect fittings are found, options to replace individual Intermediate frame fittings (with same P/N) when time constraints apply, to allow A/C fly-on, and then initiate incorporation of the new standard of Intermediate frame fittings at the next scheduled A/C C-check maintenance period.

EASA response:

Comment not agreed. EASA does not deem it acceptable to specify a compliance time in flight cycles (FC) only, as not all aeroplanes are flown at the same rate. Based on this consideration, EASA finds it more appropriate indicating an additional calendar compliance time with the aim of addressing the unsafe condition earlier than 9,000 FC on aeroplanes that are flown less frequently.

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

