

COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-086

[Published on 01 July 2022 and officially closed for comments on 29 July 2022]

Commenter 1: Cathay Pacific – Gawin Lau – 25/07/2022

Comment # 1

APU ISOV P/N: 2080023-102 and Engine LP SOV P/N: 2140083-101 are required to perform SDI (Special Detail Inspection) as per Airbus SB A350-28-P013 Rev 01 and if the unit is pass, unit can remain on wing for flying and no physical marking to indicate this affected S/N has been checked.

AD paragraph 4 states “From the effective date of this AD, do not install on any aeroplane an affected APU LP SOV, an affected engine LP SOV, or an affected APU ISOV. “

CPA question as follow:

For the APU ISOV or Engine LP SOV affected S/N that passed the SDI by accomplished SB A350-28-P013:

- if any defect found for APU ISOV in the future, can operator still dispatch the aircraft under MMEL item 28-22-02?
- Will the affected APU ISOV and affected Engine LP SOV that pass the SDI are consider as serviceable unit? If not, that means these affected units cannot be re-install back to aircraft after the effective date of the AD as per AD paragraph 4 requirement and hence it can only be scrapped.

EASA response:

Comments noted.

Question 1: The AD requires accomplishment of a one-time inspection to confirm the thermal relief valve reseats properly and to test the fuel isolation from the APU ISOV and the engine LP SOV. If this inspection is passed without findings, it is assumed that there is no FOD present and, consequently, there are no further AD requirements for affected APU ISOV and affected Engine LP SOV. The MMEL item and MMEL dispatch restrictions are not affected and subsequent findings should be managed through the standard reporting processes. No change has been made to the final AD in response to this comment.

Question 2: The purpose of the Parts Installation paragraph is to prevent the introduction of a potential unsafe condition on additional aeroplanes by prohibiting the installation of affected APU ISOV / affected Engine LP SOV after the effective date of the AD. Affected APU ISOV / affected Engine LP SOV already installed on an aeroplane (before the effective date of the AD) can remain in service, provided they have passed (without findings) the

inspection as required by the AD, until they are removed from the aeroplane for any reason. No change has been made to the final AD in response to this comment.

Commenter 2: China Southern Airlines – Fan Jun – 25/07/2022

Comment # 2

Recently I reviewed the EASA PAD 22-086 and have a question about the method of identifying the affected parts. There is no clear definition about the method. So I wonder if it is acceptable that operator identify the affected parts through digital maintenance records or IT system?

EASA response:

Comment noted. The AD does not prescribe any specific method to determine whether or not an affected part is installed. Therefore, any method for part identification is acceptable, provided it can be relied upon for the purpose of the AD. This includes the use of (digital) maintenance records. No change has been made to the final AD in response to this comment.

