

COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-094

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Commenter 1: All Nippon Airways CO.,LTD – Takayuki Ishii – 03/08/2022

Comment # 1

A. NMSB 72-AK635 - The TLM Chapters 05-10 is revised to add the following sentence.

Where specific Critical Part life management is required by serial number, this is enacted through artificial ageing NMSB 72-AK635 which must be referred to and enacted where applicable, on initial adoption of each new TLM revision.

The NMSB was issued to apply artificial aging to limit the life of specific critical parts. ANA surely follows the NMSB requirement, but the NMSB is not listed in "Ref. Publication(s)" of the PAD. Is the NMSB content of the EASA AD and is it a legal requirement? In the other words, does the EASA AD require just to accomplish mandatory actions in accordance with the TLM and the NMSB is not directed by the EASA AD because the NMSB does not show the life limit? As EASA might know, the NMSB will be up-issued apart from the TLM. Therefore, we would like to know if we have to get an AMOC when the NMSB is revised.

B. Definitions: The AMP - Commission Regulation (EU) 1321/2014, Part M.A.301, paragraph (c) is referred, but paragraph (c) is not found. Is it a typo of paragraph 3, or the new paragraph will be available?

C. The applicable life limit - The TLM introduces life limit reduction of some part numbers. The new life limit is zero, so the parts must not be used. It also means that the parts must not be installed to any Trent 1000 Package C engines.

Does the EASA AD require not to install the part as part of the "Maintenance Tasks and Replacement of Critical Parts"?

EASA response:

A. Comment noted. NMSB 72-AK635 is not directly part of the AD requirements, although the statement quoted indicates that the limits as specified in the NMSB are equally valid as the rest of the TLM. The life limits in the NMSB are, as noted, for individual parts and have various backgrounds, unrelated to design considerations. Since there is no formal relationship between the NMSB and the AD (other than through the TLM reference), and considering that those individual limits are below the limits imposed by the TLM (i.e. required by the AD), no AMOC application is necessary.

B. Comment not agreed. Part M.A.301 (see [regulation EU 1324/2014](#)) has been updated, where there is no paragraph 3 anymore, now replaced with paragraph (c).

C. Comment understood. Where a part life is set to 'zero' in the TLM, that means it cannot be installed anymore.

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

