

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-105

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### Commenter 1: Delta Air Lines – Stephen Hill – 30/08/2022

#### References:

- (A) EASA Proposed Airworthiness Directive: PAD No. 22-105, dated 01 Aug 22
- (B) DGAC France AD F-2004-028R2 (EASA approval 2005-6373), dated 26 Oct 05
- (C) Airbus Service Bulletin (SB) A330-54-3021
- (D) Airbus Service Bulletin (SB) A330-54-3022
- (E) Pratt & Whitney Service Bulletin (SB) PW4G-100-A54-5
- (F) FAA AD 2006-10-13, effective date 20 Jun 06
- (G) Airbus Service Bulletin (SB) A330-54-3050
- (H) FAA Global AMOC ANM-116-08-203, dated 31 Mar 08
- (I) FAA AMOC ANM-116-17-235, dated 30 Mar 17
- (J) Pratt & Whitney Service Bulletin (SB) PW4G-100-A54-7

#### Comment # 1

DAL requests an amendment to impending AD applicability statement exemption to Airbus modification production embodiment or SB in service embodiment

Ref (A) pertains to a potential unsafe condition which is addressed through Ref (B) which requires initial and repetitive inspection on applicable A330 lower aft pylon fairings (LAPF) through accomplishment of Ref (C). Depending on findings, certain corrective actions are required and provides an optional terminating action addressed via Ref (D) and Ref (E). In response to Ref (B), the FAA issued Ref (F) to address the potential unsafe condition and require the initial and repetitive inspections. Since issuance, Ref (A) was prompted to incorporate an additional optional terminating action Ref (G). Ref (A) will supersede Ref (B)

Upon review of Ref (A), the applicability defines the aircraft models susceptible to the unsafe condition and provides an exception on those which Airbus modification (mod) 53623 has been embodied in production, and those on which Ref (D) or Ref (G) that have been embodied in service. This



statement is being interpreted or can lead to interpretation indicating that both the production mod and the service bulletin must be embodied/accomplished to be exempt for the impending AD requirements.

Please note that production mod 53623 is modification associated with Ref (D), and Ref (D) is the in-service accomplishment of mod 53623. Therefore, the exemption statement of “Airbus modification (mod) 53623 has been embodied in production, and those on which Ref (D) that have been embodied in service” is not possible.

Furthermore, Ref (H) was previously issued for Ref (F) accepting accomplishment of either Airbus modification (mod) 53623 in production or accomplishment of Ref (D) as an AMOC to Ref (F) paragraph (i) as terminating action.

Therefore, DAL requests an amendment to Ref (A) applicability statement to provide an exception on those which Airbus modification (mod) 53623 has been embodied in production, or those on which Ref (D) or Ref (G) has been embodied in service. Utilizing verbiage “or” in lieu of “and” or clarification to the applicability verbiage clarifying such.

### *Comment # 2*

#### Consumable acceptance for CYTEC, DAPCO 2200 in lieu of RTV 106

Ref (B) and Ref (F) requires repetitive inspections of the A330 Lower Aft Pylon Fairing (LAPF) firewall corners per Ref (C) and provides Ref (E) (at any revision) as an additional source of information

The latest revision Ref (E), Rev 2, introduced a higher quality repair per the SRM, requiring removal/re-application of Red RTV 106 sealants to the lower corner areas of the LAPF firewall. However, the cure time of Red RTV 106 is approximately 24 hrs. which is not conducive for A/C routing and scheduling at the standard 1000 FH repetitive intervals.

As a part of Ref (E), both sealants Red RTV 106 and DAPCO 2200 are applied to the firewall at production under Ref (E) and CMM procedures. These sealants both reach a hardness of 30 Shore A and are heat resistant (maintain fireproof specs and retain hot exhaust gases). The properties and current usage of these sealants on the firewall establish an equivalent level of safety for the purpose of using them interchangeability.

As such, it was determined that the use of DAPCO 2200 in lieu of Red RTV 106 as an alternate sealant to be applied to the lower corners was acceptable and approved through Ref (I) allowing use of Use of DAPCO 2200 in lieu of Red RTV 106, respectively, within Ref (E) Accomplishment Instructions Step 1.A.(1) (sealant removal) and Step 1.A.(3) (sealant reapplication).

Therefore, DAL requests an addition to Ref (A) approving use of CYTEC, DAPCO 2200 in lieu of RTV 106 sealant while performing initial and repetitive inspection as well as necessary corrective actions.

### *Comment # 3*

#### Ref (A) Ref. Publications inclusion of SB PW4G-100-A54-5

During review of Ref (C), it was observed that within the accomplishment instructions, Ref (C) refers to Ref (E) for repair.

However, upon review of Ref (A), Ref (E) is not referenced within as a reference document. Therefore, DAL requests Ref (E) be added to Ref (A) Ref. Publications.



**Comment # 4****Ref (A) Ref. Publications inclusion of SB PW4G-100-A54-7**

During review of Ref (D), it was observed that within the accomplishment instructions, Ref (D) refers to Ref (J) for modification. However, upon review of Ref (A), Ref (J) is not referenced as a reference document. Therefore, DAL requests Ref (J) be added to Ref (A) Ref. Publications.

**Comment # 5****Required for Compliance - Paragraph**

During review Ref (C), Ref (D), and Ref (E) it was observed that the accomplishment instructions do not contain Airbus standard notes stating that the preparation, gaining access and close-up instructions, not comprising return to service tests, do not constitute or affect the technical intent of the Service Bulletin. Allowing operators, as deemed necessary, to omit or add access and/or close-up steps to add flexibility to their maintenance operations if the technical intent of the Service Bulletin is met within the set parameters. This content is typically a part of Airbus service bulletins and allows flexibility for shop activities as well. Please note standard verbiage such as this is added to recently Airbus SB publications. Therefore, DAL requests Ref (A) includes a paragraph allowing operators flexibility as deemed necessary, to omit or add preparation, access and/or close-up steps to Ref (C), Ref (D), and Ref (E).

**EASA response:****Comment 1:**

***Comment not agreed: EASA does not agree the proposed wording can be misread as suggested in the comment. The wording “except those.... and except those” (‘except those’ repeated) identifies two different conditions, upon which an aeroplane is not included in the applicability. To require both the mod and the SB, the wording “except those on which Airbus mod and Airbus SB have been embodied” should have been used.***

***However, to increase the readability of the AD, a different wording is used in the final AD.***

**Comment 2:**

***Comment noted. EASA consider that such information should be part of the instructions of the SB (ref. E). To be noted that later rev. of that SB are acceptable for compliance. No changes have been made to the Final AD in response to this comment.***

**Comments 3 and 4:**

***Comments not agreed: Those SBs are referenced in the Airbus SBs, already listed in the Ref. Publications section of the AD. To be noted that listing those PW SBs in the Ref. Publications would not allow using later revisions of those SB for compliance, as they are not issued by an EASA approved DOA and, therefore, EASA is not preliminary informed about the content of those revisions. No changes have been made to the Final AD in response to those comments.***

***Comment 5:***

***Comment noted. As a general note, the “RC marking” is not called in EASA AD. It has to be noted that the AD requires “inspection”/“repair”/“modification” iaw the instructions of the SB. The AD does not require “accomplishment of the SB” (which would also include access and close-up instructions). No changes have been made to the Final AD in response to this comment.***

