

COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-151

[Published on 10 November 2022 and officially closed for comments on 08 December 2022]

Commenter 1: All Nippon Airways CO.,LTD – Takayuki Ishii – 30/11/2022

Comment # 1

- A. Compliance of AMP revision - The TLM SUBTASK 05-20-01-890-803 Other Mandatory Inspections, instructs an inspection of the IP compressor module at an interval of not more than 9600 hours or 3200 cycles whichever comes first. The inspection is applicable only to engines/modules post SB 72-K434. However, the SB is not published at this moment and will be available mid-2023. AMP revision is required within 12 months after the effective date of this AD, but we cannot revise the AMP until the SB comes through. Could you advise the compliance of AMP revision in terms of the mandatory inspection for post-SB 72-K434 IP compressor module, please?
- B. Reason for the AD issue - Actually, life limits of all of the critical parts in the TLM have not been changed since TLM revision 23. Apart from that, NMSB 72-AK635 introduces artificial aging of certain critical parts and the TLM Chapters 05-10 refers to the NMSB. We understand that the NMSB is not directly part of the AD requirements and there is no formal relationship between the NMSB and the AD. Therefore, we believe that the NMSB release and noted as the TLM reference is not a reason for the new AD issue. Could you let us know the main reason for the new AD issue, please?

EASA response:

- A. Comment not agreed. The operator's AMP only needs to contain TLM tasks that are applicable to the engine (configuration, mod-status). Note that paragraph (3) of the AD refers to tasks "as applicable to engine model and depending on engine configuration". Since Subtask "05-20-01-890-803 Other Mandatory Inspections" is related to post-SB 72-K434 engines (which do not exist yet), in EASA view there is no need – at this time – to introduce that subtask into the AMP, subject to agreement from the competent authority.**
- B. A new life limit was introduced in revision 27 relating to IPC module life (when SB 72-K434 is incorporated) in addition to new or amended inspections being introduced in revisions 25 and 27. It is correct that NMSB AK635 is not part of the requirements this AD.**

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

