

COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-182

[Published on 21 December 2022 and officially closed for comments on 18 January 2023]

Commenter 1: Cathay Pacific Airways – Gawin LAU – 22/12/2022

Comment # 1

- A. Step 3. B. (2) (d) states to make sure both LH and RH outer tanks are empty before the detailed inspection.
- a. May I know will whether there are any potential risks if the aircraft is installed with fuel pumps P/N 568-1-28300-103 (EASA AD 2022-0197)?
- B. Step 3. C. (1) d <7> requires to record the capacitance value every 10 minutes for 60 minutes (total 5 results) and compare them with the initial result at step 1b.
- a. May I know whether the “at least 50pF” difference is compared to the last result of the capacitance value at 60 minutes or to the initial result?
OR during the test, if it is found that for the first 10 minutes (or for 2nd or 3rd result at 20 mins and 30 mins) it is much slower than the initial result?
- C. As CPA is operating some of the very old A330 and we have concern on what the likelihood of having leakage between FWD and AFT inner tank is?
And if the leakage is confirmed, what is the corrective action?

EASA response:

NOTE: as Comment 1A and Comment 1B are issued to Airbus SB A330-28-3141, the answers to those comments have been provided by Airbus

1A) Comment noted. There are no potential risks if the aircraft is installed with P/N: 568-1-28300-103 pumps providing that the procedure is correctly followed and the pumps are switched off once the collector cell fuel quantity drops to 200kg

1B) Comment noted. All measurements recorded during the 60-minute measurement window should be compared against the equivalent initial value recorded during step 1 b) - i.e. prior to operating the fuel pump. This is to ensure that the FWD-AFT tank boundary does not show signs of a leak when tested over a period of time, and the 2pF limit has been chosen to avoid test failures for leak rates which are not significant in the case of the UERF event.

1C) Comment noted. Please refer to the Reason section of the AD. EASA cannot share a fleet risk assessment. For a specific aeroplane, it is not possible to comment on the likelihood of a leakage. If a leak is confirmed (by witnessing a greater than 2pF difference in AFT tank capacitance values) then an inspection of the tank boundary should be carried out and corrective action applied to address the source of the leak. Potential



AMM procedures which may be applicable in this instance include TASK 28-11-00-790-804-A and TASK 28-11-00-790-801-A. The operator may also refer directly to Airbus for support if required, in accordance with paragraph (2) of the AD.

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

Commenter 2: Air France – Jean MICHOT – 13/01/2023

Comment # 2

After reviewing EASA PAD 22-182 “ATA 28 – Fuel – Inner Fuel Tanks – Leak Test,” AFR would like to know if the leak test required by this PAD and associated AIRBUS SB is necessary/relevant for A/C delivered some 20 years ago, on which no Uncontained Engine Rotor Failure (UERF) event was detected and no finding was detected during repetitive inspection (each 24 month) of emergency isolation valve (FIN 5109QS1/2) and actuator (FIN 109QB1/2) in accordance with MPD TASK 281100-05-1 operational check of each emergency isolation valve, using individual motors, to prove correct actuator operation and cockpit indication ?

EASA response:

EASA confirm the test is required on all aeroplanes as listed in the SB effectivity. No changes have been made to the Final AD in response to this comment.

