

COMMENT RESPONSE DOCUMENT

EASA PAD No. 23-009

[Published on 23 January 2023 and officially closed for comments on 20 February 2023]

Commenter 1: Willis Asset Management Limited – Jose Almeida – 25/01/2023

Comment # 1

EASA PAD 23-009 does not include applicability for the A330 NEO, although the APU is the same.

We can assume all original A330 NEO APUs will be compliant, however in case of APU failure an operator might choose to install an older APU that should be affected.

Currently there can be APUs installed on A330 NEO that are not compliant.

It can also be misleading as an operator might only have a fleet of A330 NEO and purchase an APU from a A330 / A340 and not be aware of the AD as the applicability does not extend to the A330 NEO.

EASA response:

Comment agreed: The applicability of the final AD has been updated accordingly.

Commenter 2: Plus Ultra – Javier Echeverría – 25/01/2023

Comment # 2

In PAD 23-009 an affected part is defined as follows:

“Affected part: Auxiliary Power Unit (APU) fuel control units, having Part Number (P/N) 3883240-3, P/N 3883240-5 or P/N 3883240-6 and a serial number as listed in the SB; or APU fuel control units, equipped with an housing assembly which received an epoxy-type repair, as identified by code P30148, P30149, P30150, or P31178 marked on the nameplate.”

Therefore, an APU fuel control unit P/N 3883240-7 could be affected if it received an epoxy-type repair, as identified by code P30148, P30149, P30150, or P31178 marked on the nameplate. As it is highly unlikely to have full records traceability for an APU fuel control unit, this definition makes it impossible to avoid the physical plate inspection, even in the case of an APU fuel control unit P/N 3883240-7.

Was that the intention of the EASA?

In case it wasn't, an alternative definition avoiding this particular issue would be:

Affected part: Auxiliary Power Unit (APU) fuel control units, having Part Number (P/N) 3883240-3, P/N 3883240-5 or P/N 3883240-6 and a serial number as listed in the SB; or APU fuel control units having Part Number (P/N) 3883240-3, P/N 3883240-5 or P/N 3883240-6 and equipped with an housing assembly which received an epoxy-type repair, as identified by code P30148, P30149, P30150, or P31178 marked on the nameplate.

EASA response:

Comment agreed: EASA confirm P/N 3883240-7 is not affected. The final AD has been updated accordingly.

Commenter 3: Delta Air Lines – Alexandra Kidd – 20/02/2023

Comment # 3

Reference:

(A) EASA Proposed Airworthiness Directive: PAD No. 23-009, dated 23 Jan 2023

Modify Ref (A) PAD applicability to include A330-941 or change applicability to the specific APU model.

Delta currently operates Airbus A330-223, -243, -302, -323, and -941 model aircraft. All models listed have installed the same APU model. The current Ref (A) PAD does not include the aircraft -941 model under the “Applicability” paragraph, even though the same issue could occur. The A330 Aircraft Illustrated Parts Catalog (AIPC) currently allows Fuel Control P/N 3883240-6 to be installed on the Model -941 aircraft which is identified under as “Affected part” by Ref (A) PAD “Definitions” paragraph. Based on this A330-941 model aircraft should be inspected for an affected fuel control unit (FCU).

EASA response:

Comment agreed: The applicability of the final AD has been updated accordingly.

