

COMMENT RESPONSE DOCUMENT

EASA PAD No. 23-051

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Commenter 1: All Nippon Airways Co., Ltd – Tetsuji Konohira – 22/05/2023

Comment # 1

A. Definitions: To simplify the definition of Group 2, ANA requests the following wording:

Groups: Group 1 engines are those that have an affected part installed. Group 2 engines are those that have Hydro-mechanical units (HMU), having Part Number (P/N) G5040HMU02 installed.

B. Required Action(s) and Compliance Time(s): Inspection(s): (1) Note 1:

In order to meet the SB 73-AK733 requirements, ANA requests the following wording:

Note 1: The EFH indicated in Table 1 of this AD are those accumulated by the affected part since new (first installation on an engine), time since overhaul (TSO), or since last CSV replacement (includes affected parts listed in Appendix 1 of the NMSB), as applicable. CSV replacement on an affected part can be accomplished in accordance with the instructions of the CSV SB.

C. Required Action(s) and Compliance Time(s): Part Installation: (4)

This requirement should have some grace period after the AD effective date. At earlier stages of post-SB 72-AK891 type introduction, there will not be enough spare HMUs available that are post-SB 72-AK891 type. To avoid AOG situation due to shortage of HMUs that are post-SB 72-AK891 type, ANA requests to have some grace period (depends upon the post-SB 72-AK891 type spare availability) after the AD effective date on this requirement. However, SB 72-AK891 2. E. (1) "One-Way interchangeable" also needs to be updated to allow "Two-Way interchangeable" during the grace period.

EASA response:

A. Comment not agreed. If a specific P/N would be mentioned, as suggested, any other 'not-affected' part (new P/N) would be excluded from being a 'serviceable' part, prompting AMOC application(s) and/or AD revision when such P/N comes into service.

B. Comment partially agreed. Note 1 has been amended.



C. Comment partially agreed. The compliance time for the initial part replacement (upon accumulating 6,000 EFH) of paragraph (1) has been amended to specify “or within 30 days after the effective date of this AD, whichever occurs later”. Paragraph (4) remains unchanged.

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

