

COMMENT RESPONSE DOCUMENT

EASA PAD No. 23-065

[Published on 07 June 2023 and officially closed for comments on 05 July 2023]

Commenter 1: Singapore Aero Engine Services Pte Ltd – Malek Aziz – 21/06/2023

Comment # 1

- A. We understand that the PAD has 2 approaches for in-shop compliance (engines that come into shop after effective date of AD):
- Reactive approach – before exceeding the compliance time as stated in the PAD, the LPT stage 1 blades are to be inspected and, if there are any cracking found, the LPT blades are mandated to be replaced (as per para 5). This is understood to be regardless of the Module 52 workscope level.
 - Proactive approach – when Module 52 is on Level 3 or 4, not taking into consideration the FH accumulated by the part, the LPT blades are mandated to be replaced (as per para 6)
- B. For engines, on the effective date of the AD, that are in a shopvisit where the pass-off test has not [been] completed, regardless of the Module 52 **workscope level** or the **FH accumulated by the affected part**, it is required to carry out the inspection.
- C. SAESL would like to suggest the AD to be written similar to EASA AD 2023-0027 which is clearer in terms of compliance.

EASA response:

- A. Comment noted. We confirm the commenter's understanding is correct.**
- B. Comment noted. We confirm the commenter's understanding is correct.**
- C. Comment not agreed. This AD requires in-shop replacement (the commenter's point B) irrespective of FH accumulated by the affected parts.**
- No changes have been made to the Final AD in response to this comment.**



Commenter 2: Singapore Airlines Limited – Muzafar Rasheed – 23/06/2023**Comment # 2**

The specific part of the AD [EASA assumes that AD 2023-0027 is referred to here] and PAD [23-065] I would also like to highlight is regarding Para (1) & (2) of the PAD and Para (1) of the AD.

The PAD uses FH accumulated by the affected part.

In my opinion, it is much clearer and direct in the PAD that this inspection is driven by the hours accumulated on the affected part. EFH is an abbreviation that is also used in the Time Limits Manual, hence using EFH is more prone to misunderstanding.

EASA response:

Comment noted, but not agreed. Operators are expected to be familiar with the difference between FH and EFH. Also, the unsafe condition addressed by AD 2023-0027 is substantially different, which is why EFH (FH accumulated by the engine or module) are used, rather than FH accumulated by the part(s).

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

Commenter 3: All Nippon Airways Co., Ltd. (ANA) – Satoshi Ishibashi – 03/07/2023**Comment # 3**

- A. Inspection paragraph (1) requires "Before exceeding 30 000 FH accumulated by the affected part since first installation on an engine". On the other hand, the NMSB specifies that the engines that have incorporated 3.B of the NMSB, carry out inspection before exceeding 30,000 FH from 3.B of the NMSB incorporation. ANA requests to confirm that the inspection intervals can be reset after the incorporation of section 3.B of the NMSB. (i.e. no inspection is required before exceeding 30,000 FH from 3.B of the NMSB implementation)
- B. Inspection paragraph (2) requires "For an engine that, on the effective date of this AD, is in a shop visit[...] before release to service of that engine." This wording makes it appear that even for "less than 30,000 FH engines" must be implemented at every shop visit. ANA requests to add the wording that it should be limited to "30,000 FH or more engines".

EASA response:

A. Comment noted. The commenter's understanding is correct. As section 3.B of the NMSB involves installation of new parts, the threshold of 30,000 EFH can be applied again following such replacement.

B. Comment agreed. Paragraph (2) of the Final AD has been amended accordingly.

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

