

COMMENT RESPONSE DOCUMENT

EASA PAD No. 23-079

[Published on 22 June 2023 and officially closed for comments on 20 July 2023]

Commenter 1: Delta Air Lines, Inc. – Michael D. Tharp – 19/07/2023

Comment # 1

Reference:

- (A) EASA Proposed Airworthiness Directive: PAD No. 23-079, dated 22 JUN 23
- (B) EASA Airworthiness Directive: EASA AD 2022-0127 dated 28 June 2022
- (C) EASA Airworthiness Directive: EASA AD 2021-0130R1 dated 10 June 2021
- (D) A350 Airworthiness Limitations Section (ALS) Part 4: Rev 08, dated 01 JUN 23
- (E) Airbus Service Bulletin (SB) A350-52-P049, dated 15 Jan 21
- (F) Airbus Tech Request (TR): 81234185

Comment A

Commenter Request

Delta Air Lines request that PAD 23-079 Ref (A) be revised to mark EASA AD 2021-0130R1 Ref (C) as superseded as the requirements of this AD were transferred into A350 ALS Part 4 Rev 08 Ref (D).

Request justification

EASA PAD 23-079 Ref (A) was issued on 22JUN23 to mandate operators to incorporate A350 ALS Part 4 Revision 08 Ref (D) into the operator's maintenance programs within 12 month after the AD effective date. A350 ALS Part 4 Revision 08 Ref (D) introduced a new maintenance requirement, SEMR 278000-00001-01E, for Slat Geared Rotary Actuator (GRA) P/N 4775A0000-02 repetitive water drainage & plug cleaning on Slat 5 / Track 12 every 6 Months or 500 FC whichever comes first on A350 aircraft per AMM A350-A-27-84-XX-00001-220A-A. Per the A350 ALS Part 4 Rev 08 Ref (D) Group of Changes Section group A, this revision transferred the EASA AD 2021-0130R1 Ref (C) repetitive maintenance requirement into task 278000-00001-01E.

List paragraphs that change; describe (nonobvious) changes

Supersedure: Revise to state, "This AD supersedes EASA AD 2021-0130R1 dated 10 June 2021 and EASA AD 2022-0127 dated 28 June 2022."



Comment BCommenter Request

Clarify that credit can be taken from last drain and clean in accordance with Airbus SB A350-27-P054 Ref (E) (any approved revision) (EASA AD 2021-0130R1 Ref (C)) for task 278000-00001-01E or revise PAD when A350 ALS Part 4 Var 8.1 is released (expected August 2023) as Airbus is expected to correct the task to add note for credit for previous accomplishment.

Request justification

A350 ALS Part 4 Rev 08 Ref (D) Task 278000-00001-01E does not contain note that “credit can be taken from previous accomplishment in accordance with Airbus SB A350-27-P054 Ref (E) (any approved revision) (EASA AD 2021-0130R1 Ref (C))” (See task 783500-R1001-01E as example). When Delta noticed this discrepancy, Delta submitted Tech Request 81234185 Ref (F) for clarification. Airbus confirmed that they mistakenly left out the note for credit however credit can be taken from previous accomplishment of EASA AD 2021-0130R1 Ref (C) and the note will be added at A350 ALS Part 4 Var 8.1 expected to be released in August 2023. Airbus also confirmed that there is no difference between AMM Task A350-A-27-84-XX-00001-220A-A and SB A350-27-P054 as well as the AMM for installation of the Slat-Track Rotary Actuator contains instructions to drain and clean.

Additionally, since A350 ALS Part 4 Rev 08 Ref (D) does not provide credit for previous accomplishment, Delta believes that we will have to continue to accomplish both EASA AD 2021-0130R1 Ref (C) requirements and A350 ALS Part 4 requirements as one mandates accomplishment of the Airbus SB and the other mandates accomplishment in accordance with AMM. Also, Delta believes that FAA operators will need an AMOC that incorporation of A350 ALS Part 4 Rev 08 terminates all requirements of EASA AD 2021-0130R1 in the meantime until the FAA AD is published mandating A350 ALS Part 4 Rev 08.

Since most of the changes in A350 ALS Part 4 Rev 08 Ref (D) are less restrictive (increasing intervals limits, typo corrections, life limit removals, etc) aside from new life limited part numbers introduced per mods, Delta suggests waiting for A350 ALS Part 4 Var 8.1 to be released to add it to this PAD/AD.

List paragraphs that change; describe (nonobvious) changes

If necessary, add note allowing credit for previous accomplishment of Airbus SB A350-27-P054 (any approved revision) (EASA AD 2021-0130R1).

EASA response:

Comment # 1.A agreed – supersedure of EASA AD 2021-0130R1 has been included in the Final AD.

Comment # 1.B partly agreed - with reference also to the reply provided to Comment A, EASA AD 2021-0130R1 will be shown as superseded, hence compliance with the ALS Part 4 Revision 8 only will be required. Airbus will introduce the necessary provisions to allow credit for previous accomplishments of the tasks required by SB A350-27-P054 in the ALS Part 4 Variation 8.1 expected in August 2023.

