

COMMENT RESPONSE DOCUMENT

EASA PAD No. 23-082R1

[Published on 29 November 2023 and officially closed for comments on 27 December 2023]

Commenter 1: All Nippon Airways Co., Ltd – Yukihiro Bunno – 08/12/2023

Comment # 1

(8) says that “Replacement of an affected part with a part in post-modification SB configuration on an aeroplane is an acceptable method to comply with (1) or (2).”

We think that (8) should be located not at "Terminating Action" but "AMOC" separately from "Terminating Action" because (8) does not clarify what to terminate.

Otherwise, if (8) stays in "Terminating Action", it should be formulated as follows to show more clearly it can terminate any actions.

Replacement of an affected part with a part in post-modification SB configuration on an aeroplane is an acceptable method to comply with the requirements of paragraph (1) or (2) of this AD, as applicable, for that part.

AND

Replacement of an affected part with a part in post-modification SB configuration on an aeroplane constitutes terminating action for the initial and repetitive inspections as required by paragraphs (1) and (5) of this AD, as applicable, for that aeroplane, provided that no affected parts are re-installed on that aeroplane after that modification.

Just for reference, all of ANA A320/A321 are Group 1 aeroplanes NOT equipped with an affected part having P/N 6018A7-000101 or P/N 6018C1-000101.

EASA response:

EASA agrees. The final AD amended accordingly.

Commenter 2: Etihad Airways – Tewodros Adamu – 12/12/2023



Comment # 2

Etihad Airways has reviewed the subject proposed AD which is applicable on aircraft with certain Galley P/Ns. The Proposed AD is also providing a terminating Airbus SBs for paragraphs 1 and 5 of the AD. However the proposed AD does not show if the EASA AMOC APPROVAL 10080483 need to be superseded following issuance of the proposed AD.

Please review and if required include the AMOC reference in the proposed AD.

EASA response:

Comment noted. EASA Alternative Method of Compliance (AMOC) 10080483 provides acceptable method of compliance with EASA AD 2021-0183R1 (superseded by the final AD) by accepting optional accomplishment of Airbus Service Bulletin (SB) A320-25-1CBN or SB A320-25-1CBP (original issue or later approved revisions). As a rule, a superseding AD always invalidates previous AMOCs to the superseded AD, unless the superseding AD includes a provision that AMOC to the superseded AD remains valid. Paragraphs (6), (7) and (8) of the final AD practically include the content of AMOC 10080483. No changes have been made to the final AD in response to this comment.

Commenter 3: Delta Air Lines – James Thompson and Alexandra Kidd – 21/12/2023

Comment # 3

Reference:

- (A) EASA Proposed Airworthiness Directive: PAD No. 23-082R1, dated 29 Nov 23
- (B) Airbus Service Bulletin (SB) A320-25-1CBN Rev 01 dated 20 Mar 23 or A320-25-1CBP Rev 01 dated 20 Mar 23
- (C) SAFRAN CABIN CZ VSB 601800-25-018 NC dated 25 Aug 22 or SAFRAN CABIN CZ VSB 601800-25-019 Rev A dated 11 Jun23
- (D) SAFRAN CABIN CZ VSB 601537-25-002 NC dated 27 Oct 22

Comment #ACommenter Request

Allowance to use Acetone in lieu of Methyl Ethyl Ketone (MEK)

Request justification

Per VSBs Ref(C), instructions reference Methyl Ethyl Ketone (MEK) as the cleaning agent when removing surface corrosion. Delta Air Lines restricts the use of any MEK product following 40 CFR 63, Subpart GG. This regulation outlines the NESHAP requirements for aerospace manufacturing and rework facilities and is one in a series that is designed to reduce the emission of Hazardous Air Pollutants (HAP); this includes minimizing emissions of volatile



organic compounds (VOC) by limiting the use of cleaners that are above certain vapor pressure. MEK falls in that category. As a result, and to comply with the above regulation, DAL's Chemical Review Committee approves MEK for very limited uses, such as thinners and not as cleaner.

DAL obtained Safran's concurrence that Acetone is used instead of MEK during manufacturing processes and cleaning. Since this is used to clean an area to treat minor non-appearance corrosion surface of the surrounding areas of the trolley retainer blocks, it does not affect the integrity of the blocks nor does infringe with the intent of the AD.

List paragraphs that change; describe (nonobvious) changes

Either add paragraph (9) or under the Remarks allowing the use of Acetone in lieu of MEK for those countries that MEK is not allowed as a cleaner.

Comment #B

Commenter Request

Clarification of Group 2 airplanes and action

Request justification

Per EASA PAD Ref(A), Group 2 are identified as those equipped with a galley which has been initially installed as an affected part on an airplane in production or in service in accordance with Airbus service instructions, and which following that installation, has been re-identified with a non-affected P/N without having the modification SB embodied.

DAL A319s and A320s have installed G5 galley P/N 601537-1. This galley is a DAL STC galley. P/N 601537-1 has been strikethrough in Appendix 1 as not an affected part of Ref(A) AD.

List paragraphs that change; describe (nonobvious) changes

Either add paragraph (10) or under the Remarks a clarification for the following:

- o Are the STC Galleys installed in service that were applicable in EASA AD 2021-0183R1 considered a 'non-affected P/N' and fall under Group 2?
- o A clarification of actions for those STC Galley that are 'strikethrough' in Appendix 1 of Ref(A) AD and are under the repetitive inspection of EASA AD 2021-0183R1.

Comment #C

Commenter Request

Safran VSBs discrepancies

Request justification

Terminating Action paragraphs in Ref(A) can be accomplished by accomplishing instructions per SB Ref(B). Airbus SB Ref(B) guides the operator to follow the instructions given in SAFRAN VSBs Ref(C). However, there are concerns with SAFRAN VSBs:



1. There are several errors in the SAFRAN VSB 601800-25-018 that have been brought up to SAFRAN and SAFRAN is working on the answer which will result in the revision of the VSB. The VSB cannot be accomplished as written currently without DAL requiring several Alternative Method of Compliance (AMOC) when it becomes a FAA AD.
2. VSBs listed in Ref(C) are only applicable to DAL Galleys P/N 601924-000001 (G2A) and 601891-000301 (G4B), with no coverage on Galleys installed on A319s, A320s, and A321NEOs.
Ref(D) VSB 601537-25-002 dated 27 Oct 22 covers the terminating action on the A319s and A320s. However, this VSB is not reference in the SBs Ref(C).

These items will consequently drive to revisions to the Airbus SBs Ref(B).

List paragraphs that change; describe (nonobvious) changes

DAL recommends EASA to wait to revise the AD until:

1. The Airbus SB Ref(B) and VSBs Ref(C) are corrected.
2. The Airbus SB Ref(B) references Ref(D) SAFRAN VSB 601537-25-002 dated 27 Oct 22, which covers A319s and A320s terminating action.
3. SAFRAN and Airbus issues the VSB with terminating action for the A321NEOs, which consequently will drive to revisions of the Airbus SBs Ref(B).

Comment #D

Commenter Request

Placard Re-Identification

Request justification

As stated above, Airbus SB Ref(B) guides the operator to follow the instructions given in SAFRAN VSBs Ref(C) to accomplish the terminating action. New ID, Amendment, and SB placards are required in the VSBs Ref(C) to be installed since the galley will be modified. The placards are obtained through SAFRAN only.

With an aim of doing more than 250+ aircraft, this will require precise and difficult logistical coordination of having the correct placards for the correct airplanes delivered by the vendor.

The information that is needed on the placards are the new Galley P/N provided in VSBs Ref(C), update the Amendment letter, and add SB number. This action does not change the intent of the AD.

List paragraphs that change; describe (nonobvious) changes

Either add paragraph (11) or under the Remarks the following:



o Operators can follow their Process Standards for re-marking or re-identification of the galleys that have been modified in lieu of using the New ID, Amendment, and SB Placards required in VSBs Ref(C).

This will eliminate the dependency to wait for the correct placard for the correct airplanes, which will cause disruption in the operation.

EASA response:

Comment A: Comment noted. Use of Acetone instead of Methyl Ethyl Ketone (MEK) shall be first formally technically approved. This can be done either as revision of SAFRAN CABIN CZ VSB 601800-25-018 NC or SAFRAN CABIN CZ VSB 601800-25-019 (with involvement of EASA since the referenced VSBs are subject of an AD) or through another technical substantiation consequently accepted and recognised as AMOC approval to the final AD. Simply stating acceptability the use of the Acetone in lieu of MEK is not possible at the time of the final AD issuance. The AD mandates AIRBUS SB that contains all specificity for required for compliance instruction flexibility. Use of cleaning alternative agent in line with AIRBUS Consumable Material List (CML) is acceptable. Otherwise AMOC process applies according to procedures of the state of registry.

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

Comment B: Comment noted. For Group 2 aeroplanes the operator is requested to contact the Design Approval Holder responsible for reidentification for further instructions. STC galleys installed in service do not belong under Group 2 aeroplane definition. For galleys modified in accordance with an STC the responsible DOA is the STC holder (and not the Airbus) and EASA investigates the course of actions for these galleys. For galleys that are “strikethrough” in Appendix 1 of the final AD, no action is required.

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

Comment C: Comment noted. Correction of VSB instructions and acceptability for later approved Airbus SBs is covered by the paragraph Ref. Publications.

It is expected that SAFRAN VSBs will cover the full affected galley population through later revisions. AIRBUS covers SAFRAN VSB for galleys certified by AIRBUS and installed at time of production delivery. Any cabin layout reconfiguration done outside AIRBUS is not addressed by this AD.

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

Comment D: Comments noted; The intent of the AD is not to take into account individual and specific operator process standard. In such a case AMOC process according to the rules of the state of registry aviation authority should be followed.

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

Commenter 4: Air Canada – Sean Bautista – 15/01/2024



Comment # 4

We have five aircraft: MSN 3160, 3286, 3123, 3149, and 3304 that are currently undergoing the AD2021-0183R1 with the repeated inspections set by the Airbus SBA320-25-1BVS. Reading through the PAD, Aft Galley G4B p/n 601891-011001 is included in the applicable galley list as shown below:

601891

601891-000301, 601891-000401, 601891-000501, 601891-000601, 601891-000701,
 601891-000801, 601891-000901, 601891-001001, 601891-001101, 601891-001201,
 601891-001301, 601891-001401, 601891-001501, 601891-001601, 601891-001701,
 601891-001901, 601891-002101, 601891-002301, 601891-002401, 601891-002501,
 601891-002601, 601891-002701, 601891-002801, 601891-002901, 601891-003001,
 601891-003101, 601891-003301, 601891-003401, 601891-003501, 601891-003601,
 601891-003801, 601891-003901, 601891-004001, 601891-004101, 601891-004201,
 601891-004301, 601891-004401, 601891-004501, 601891-004701, 601891-004801,
 601891-004901, 601891-005001, 601891-005101, 601891-005201, 601891-005301,
 601891-005401, 601891-005501, 601891-005601, 601891-005701, 601891-005801,
 601891-005901, 601891-006001, 601891-006101, 601891-006301, 601891-006401,
 601891-006501, 601891-006601, 601891-006701, 601891-006901, 601891-007001,
 601891-007201, 601891-007301, 601891-007401, 601891-007501, 601891-007601,
 601891-007701, 601891-007801, 601891-007901, 601891-008001, 601891-008101,
 601891-008201, 601891-008401, 601891-008501, 601891-008701, 601891-008801,
 601891-009001, 601891-009101, 601891-009201, 601891-009301, 601891-009401,
 601891-009501, 601891-009601, 601891-009701, 601891-009801, 601891-009901,
 601891-010101, 601891-010301, 601891-010401, 601891-010601, 601891-010701,
 601891-010801, 601891-010901, 601891-011201, 601891-011301, 601891-011501,
 601891-011601, 601891-011701, 601891-011801, 601891-011901, 601891-012001,
 601891-012201, 601891-012401, 601891-012501, 601891-012601, 601891-012701,
 601891-012801, 601891-012901, 601891-013001, 601891-013101, 601891-013201,
 601891-013301, 601891-013501, 601891-013601, 601891-013701, 601891-013901,
 601891-014001, 601891-014201, 601891-014401, 601891-014501, 601891-014601,
 601891-014701, 601891-014801, 601891-014901, 601891-015001, 601891-015101,
 601891-015201, 601891-015301, 601891-015601, 601891-016101, 601891-016201,
 601891-016501, 601891-017601, 601891-017701, 601891-017801, 601891-017901,
 601891-018001, 601891-018101, 601891-018301, 601891-018401, 601891-018701

The Airbus SB: -1CBNR01 did include the MSN numbers in the applicable list, however, SBA320-25-1CBNR01 and the Safran VSB: 601800-25-018, -019, did not list galley p/n 601891-011001 in the respective applicable galley lists. Please provide the disposition required for this galley at the earliest.

EASA response:

Comment agreed. The missing P/N 601891-011001 and P/N 601858-053101 have been added into the Appendix 1 of the final AD. Currently, Safran VSBs do not include the full affected population but the Airbus SBs address all population of (non-modified) aeroplanes delivered at the time of the SB publication.



The final AD has been amended accordingly.

Commenter 5: Etihad Airways – Tewodros Adamu – 22/01/2024

Comment # 5

Clarification on the applicability of the optional terminating action SB should be indicated after performing the intermediate repair or any other RDAF approved repair.

EASA response:

Comment noted. Airbus design review concluded that no Airbus / Safran repair implemented as a result of finding through inspection SBs, and in accordance with the inspection SB, needs specific instructions for embodiment of the optional terminating SB.

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

