

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 23-122

**[Published on 13 November 2023 and officially closed for comments on 11 December 2023]**

**Commenter 1: Deutsche Lufthansa AG – Patrick Körber – 05/12/2023**

### Comment # 1

The TLM Task 05-20-01-800-801 Airworthiness Limitations defines two mandatory inspections (J. and K.) of the IP Compressor Shaft Stage 8 Disc Balance Land.

These two inspections are identical, except for their differences in the applicability and the inspection interval.

1. What interval of inspection would apply to a part (IPC Shaft Stg. 8 Disc Balance Land) that was originally operated in a 972E-84 engine (E-rated) but is now operating in a 970-84 configuration?
  - a. Should an intermediate value be calculated for the inspection interval according to a rule that considers the FC or FH the part has been used in each configuration?
  - b. Or should one of the inspection intervals (either of inspection J. or inspection K.) be used?
2. What interval would apply to a whole engine that was originally operated as a 972E-84 engine and was later re-rated to another engine variant (e.g. to 970-84)?
3. The new AD should include an explicit credit for AMOC Approvals based on AD 2018-0048, if this AMOC refers to unchanged items of the TLM.
4. TLM Task 05-20-01-800-801 items J. and K. are not applicable to S/N with Prefixes RRDCDD0 and RRDCDD1 as per Note in the TLM. The technical reason therefore is that these S/Ns have embodied SB 72-AH561 from zero cycles since new. However, expecting a continuous S/N assignment of these parts, this will also be true for S/N prefix RRDCDD2 and so on. The new AD should consider this fact.

### EASA response:

***Comments #1(a) & #1(b) & #2: Based on the commenter input, RRD intends to amend the T-TRENT-9RR (the TLM) to consider rating changes. Until the TLM update is published, EASA recommends using the more conservative inspection interval, or alternatively, seek RRD support for an AMOC approval for any other inspection interval solution/proposal.***

***No change has been made in response to this comment.***



**Comment #3: Comment noted. EASA is not aware of any AMOC issued to AD 2018-0048R1 providing equivalent safety with the requirements of the new AD. EASA invites the commenter to provide copies of AMOCs he referred to. Based on the provided AMOC approvals, EASA may consider revising the AD and accepting the AMOCs issued to AD 2018-0048R1.**

**No change has been made in response to this comment.**

**Comment #4: Comment noted. Based on the commenter input RRD considers updating the TLM. At the time of the AD issuance no safety threat is created by the current TLM wording.**

**No change has been made in response to this comment.**

### **Commenter 2: Ian Jakeway – 10/12/2023**

#### **Comment # 2**

- A. With regards to Applicability: “RB211 Trent 970-84, 970B-84, 972-84, 972B-84, 972E-84, 977-84, 977B-84 and 980-84 engines, all serial numbers. These engines are known to be installed on, but not limited to, Airbus A380 aeroplanes.” If it is not limited to A380, how do you read this proposed AD across to another unidentified product?
- B. I'm probably missing something but this Proposed AD refers to the AMP, so isn't this an aircraft level safety requirement? And, on page 3 para 4, acceptable to incorporate the new and/or more restrictive tasks and limitations... Suggests to this writer that one could manage the configuration (task) by the AMP alone, which has no reference in the proposed AD. Could an operator mistakenly omit to record work against the powerplant?
- C. Page 2 para 7, EASA AD 20218-0048R1, should read EASA AD 2018-0048R1?

#### **EASA response:**

- A. The AD is applicable to RB 211 Trent 900 engines independently of the aircraft type on which the engine is installed on. But because the provisions of the Part 21 defines the AD as a means “...which mandates action to be performed on an aircraft to restore an acceptable level of safety...”, in case of engine ADs, EASA is required to indicate known aircraft types on which the affected engine is eligible for installation without an ambition to list all known application of the affected engine. The sentence cited by the commenter is a standard part of each engine AD. No change has been made in response to this comment.**
- B. Part M mandates operators to maintain the continuing airworthiness by accomplishing (among others) of all maintenance in accordance with the Aircraft Maintenance Programme (AMP). In turn this AMP shall be compliant with the continuing airworthiness instructions issued by the type**



***certificate holder (TCH). For that purpose, the AMP shall be reviewed and updated regularly to include those instructions. The AD mandates to make this AMP update with respect the applicable TLM withing 12 months after the effective date of the AD. Until that AMP happens, the operator shall treat TLM tasks as AD tasks and record accomplishment of each task for AD demonstration purposes. After the AMP is updated (to incorporate either the full TLM document, if the previous TTLM is not incorporated yet, or the new and/or more restrictive tasks and limitations in compare with the previously incorporated TLM into the AMP, as applicable) it is acceptable to record the accomplishment of the task ask AMP task.***

***No change has been made in response to this comment.***

***C. EASA agrees. The typo has been corrected in the final AD.***

***Commenter 3: All Nippon Airways CO.,LTD - Takayuki Ishii – 08/12/2023***

***Comment # 3***

***A. Reason***

I realized that the last sentence which starts "For the reasons" has a typo.

"EASA AD 20218-0048R1" should be corrected to "EASA AD 2018-0048R1".

***B. Credit***

As the AMP is the Aircraft Maintenance Programme for an aeroplane not an engine, ANA requests to change the following word.

" for an engine installed on an aeroplane" to "for an aeroplane".

Actually, EASA AD 2023-0195 for Trent 1000 engine uses "for an aeroplane" in the Credit paragraph.

***EASA response:***

***A. EASA agrees. The typo has been corrected in the final AD.***

***B. EASA agrees. The wording has been changed in the final AD.***

