

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 24-113

**[Published on 30 September 2024 and officially closed for comments on 14 October 2024]**

### Commenter 1: Edelweiss Air AG – Beat Ritzmann – 01/10/2024

#### Comment # 1

Thanks for publishing the PAD 24-113 related to the SB 53-1491. As mentioned in the PAD the inspection threshold is 12 months for all that has reached the flight cycle limits after the AD effective date. We have several aircraft that have reached this threshold limit.

To perform this SB inspection, we have to remove the lavatories (heavy access) with corresponding increased additional findings risks.

I assume that the AD will publish soon and that means that we must perform the inspection before the base maintenance season 2025/2026 ends. This brings us in troubles because we have no base maintenance ground time for all affected aircraft planned.

Therefore, an extended 18-month threshold would be really helpful to bring all affected aircraft in a regular base maintenance ground time.

#### **EASA response:**

#### **Comment noted.**

**Table 1 of the AD provides 2 or 3 different options (whichever occurs later) for the initial inspection threshold.**

**In case a compliance time extension is needed, please contact your responsible NAA for an Article 71 exemption.**

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

### Commenter 2: Aegean Airlines S.A – Antouanetta Iliopoulou – 01/10/2024

#### Comment # 2

1) Regarding “Table 1 – Initial SDI and Interval”, we understand that for the inspection thresholds defined the following apply:

#### **Group 1**



- “20000 FC” threshold refer to A/C not already inspected.
- “ Within 19 700 FC after the last inspection in accordance with the original issue or Revision 01 of the instructions of Airbus SB A320- 53-1491, as applicable” refer to A/C already inspected.

The “Within 12 months after the effective date of this AD.” gives a grace period for A/C already inspected or does it apply to first inspections too? It should be clarified.

In any case, the above thresholds refer to different A/C statuses and the “whichever later” cannot be valid for all cases. The table should be amended.

## **Group 2**

The threshold option “for aeroplanes without Airbus SB A320-53-1290 embodied at any previous revisions: Within 16 200 FC after the last inspection in accordance with the Airbus SB A320-53-1288 without findings AND Airbus SB A320-53-1491 without findings, whichever occurs first” is vaguely defined.

It is assumed that only the affected area (i.e. inner cap/ web horizontal flange/ or door stop fitting #1 at frame 68 LH and/or RH) should be without findings. If this is the case it should be clarified further in order to exclude findings in other locations or other door stop fittings.

The same comments regarding the “Within 12 months after the effective date of this AD” and the “20000 FC” also apply.

The thresholds seem to refer to different A/C statuses and the “whichever later” cannot be valid for all cases.

## **2) Regrading paragraph (5) – Credit:**

This paragraph seems to overlap with the new thresholds of Table 1. If credit can be taken from previous SB revisions, why for example the threshold “Within 19 700 FC after the last inspection in accordance with the original issue or Revision 01 of the instructions of Airbus SB A320-53-1491, as applicable,” is introduced?

### ***EASA response:***

### ***Comment noted.***

***Table 1 has been updated to remove the compliance time of 12 months, as it was not deemed necessary for group 1 aeroplanes.***

***Paragraph 5 was updated accordingly and credit can only be taken by Group 1 aeroplanes.***



**Commenter 3: Air France – Eric Luccantoni – 09/10/2024****Comment # 3**

After review of the PAD 24-113, AFR understands that unlike AIB, which recommends to re-inspect ALL areas, EASA allows operators to split each inspection area and to take benefits from previous inspections with AD 2022-0030 for already inspected areas.

AFR thinks that the second inspection threshold in each group can be confusing to some operators if the concerned inspection area is not clarified and may lead to non-accomplishment of the ISB R02 at the new area.

AFR would like EASA to highlight the EACH in Paragraph (1) or to clarify that splitting of the inspections areas is allowed to avoid operators to misunderstand the inspection threshold for the new area (at door stop fitting 1).

**EASA response:**

**Comment agreed. “Each” was underlined in the final AD.**

**Commenter 4: Air New Zealand – Ben Whiting – 10/10/2024****Comment # 4**

- A. EASA needs to provide clarification on how an aircraft falls under each group and which inspection requirements apply accordingly as it conflicts with the ISB. To split aircraft into groups, operators must complete an inspection to determine whether a repair part has been installed or not. This cannot be done with a records check.
- B. EASA has not addressed the situation of aircraft that have already surpassed the initial inspection threshold (>20,000 flight cycles).
- C. EASA has not accounted for aircraft that have exceeded 20,000 flight cycles but have yet to undergo the inspection in accordance with SB A320-53-1491 Revision 02. The one-year grace period may not be sufficient for operators to align this inspection with a heavy maintenance check, potentially necessitating a one-off inspection requiring significant man-hours and aircraft downtime. EASA should synchronize this AD with the ISB grace period requirements to avoid significant operational disruptions.
- D. Additionally, Table 1, Group 2 requires further clarification regarding the criteria for aircraft classification into this group. It specifies that Group 2 applies to aeroplanes without Airbus SB A320-53-1290 embodied in any previous revision, which should be made clearer in the Definitions section of the PAD.



**EASA response:**

**A: Comment noted. If it can not be determined by aircraft records or a similar proof, the aircraft has to be inspected to determine the group.**

**B: The table provides compliance times “whichever occurs later” and has as a last option: Within 12 months after the effective date of this AD, which covers the possibility, if 20 000 FC or 19 700 FC after last inspection have been passed (for Group 2 aeroplanes). Please also note Comment 1 and 2.**

**C: Please refer to answer to Comment 1 and 2.**

**D: The AD Group definition does not depend on SB embodiment status. The Group definition is based on having the Part Number installed or not.**

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

**Commenter 5: Airbus India Pvt. Ltd – Abin Baby – 10/10/2024**
**Comment # 5**

We are writing this on behalf of the TGW operator in which 3 of the aircraft have been performed with initial inspection via R01 of SB 53-1491 without finding (repair parts not installed).

Note: All the three aircrafts are not complied with SB 53-1288 inspection & MSB 53-1290.

We would like to clarify on Para (1) & (5) of PAD for Group 2 aircraft, as per Para(1) the reinspection has to be performed before 20000 FC / within 12 months after the effective date of this AD.

( Criteria, within 16 200 FC after the last inspection in accordance with the Airbus SB A320-53-1288 without findings AND Airbus SB A320-53-1491 without findings, whichever occurs first - **Not fulfilled**)

But per Para (5), the credit has been given for previous revisions of SB compliance.

We are a little confused on the contradictory statement on Para (1) & (5). Has any other operator raised any concern on this matter?

We would like to clarify by EASA, is the re-inspection required for these aircraft with previous revision performed?

**EASA response:**

**Please see comment 2.**

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



**Commenter 6: Deutsche Lufthansa AG – Ainara Ziarrusta Atutxa – 11/10/2024****Comment # 6**

- A. Group 1 is defined as aeroplanes on which Airbus repair part R53420799 is installed (referenced in SRM 53-41-12-300-011, this SRM Task is also referenced in SB A320-53-1491 Rev 02) or any other repair part approved by Airbus is embodied (through Airbus RDAF). We believe that A/C repaired in accordance with pageblock based SRM Task 53-41-12 Para 5.F Fig 205 (Rev 110 or older) are also to be considered as Group 1 A/C. Please confirm that our assumption is correct.
- B. Regarding Group 2 time compliance (Table 1): for pre mod 53-1290 A/C, last inspection of 53-1288 or 53-1491 (both without findings) can be used as baseline. At DLH we have some A/C where SB 53-1288 has still never been performed. This is so because in AD 2021-0242 credits from ALI Tasks 534129 und 534130 could be taken, therefore the deadline for SB 53-1288 has still not been reached (since last accomplishment of ALI 534129 and/or 534130).
- Considering that inspection per ALI 534130 and SB 53-1288 is identical for FR 68 area, please also include that last inspection per SB A320-53-1288 or ALI 534130 (if performed without findings) can be used as baseline in the Threshold definition.
- C. As we understood from the Airbus Webinar and TFU, credit from SB A320-53-1491 Rev 00 or 01 cannot be taken in this case. Meaning that regardless of when the inspection in accordance with previous revisions were performed, inspection needs to be performed within 12 months (with exception of A/C with repair part Group 1, and now also for Group 2 premod 53-1290 if inspection without findings, but this is all specifically defined in Table 1). However, the credit paragraph leads to confusion as it says in a general way that credit from previous SB Revisions can be taken, which we believe is not the case.

**EASA response:**

**A: This assumption is confirmed, if the configuration was not changed after that repair.**

**B: Comment agreed. Table 1 and Paragraph (5) were updated accordingly.**

**C: Comment agreed. Paragraph (5) was updated accordingly to clarify the credit applies only to Group 1 aeroplanes.**



**Commenter 7: Ryanair Engineering – David O'Donnell – 11/10/2024****Comment # 7**

Ryanair has noted that PAD 24-113 Para(5) gives credit to comply with the requirements of Para (1) for SDIs accomplished on an “Inspection area” using Rev 00 or 01 of Airbus SB A320-53-1491 before the effective date of the AD. The “inspection area” as defined within the definitions of PAD 24-113 includes the area “around the door stop 1 nuts, aft passenger/crew door, LH and RH sides”. Ryanair notes that the area around the door stop 1 nuts was not covered by the inspection instructions of Rev 00 or 01 of Airbus SB A320-53-1491 and was introduced only in Rev 02 of SB A320-53-1491. This would suggest that it is not possible to have performed an SDI on the “inspection area” as defined in this PAD using Rev 00 or 01 of Airbus SB A320-53-1491 due to the lack of those instructions within those SB revisions. Subsequently it would not be possible to meet the criteria required to use this credit paragraph.

As such, Ryanair requests clarification on the criteria required to use Para(5) Credit.

***EASA response: Comment agreed. This credit can only be taken for inspection areas, for which instructions exist. The credit can be taken for one inspection area or several. Note 2 was added in the AD.***

