

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 24-136

[Published on 13 November 2024 and officially closed for comments on 11 December 2024]

**Commenter 1: Deutsche Lufthansa AG – Patrick Körber – 03/12/2024**

### Comment # 1

Lufthansa has reviewed PAD 24-136 // T-TRENT-9RR Rev. 67 and provides the below comments based on Task 05-20-01-800-801 Item R:

- A. Unclear tracking of Limits: IP8 Air Tubes are not serialized. At the time being it is fully non-transparent how to track the limits.
- B. Missing Accomplishment Procedures: The CIR Task referred by ref. Task is not published in current CIR Rev. 180.
- C. Missing Grace Period: Neither the TLM nor the proposed AD consider a grace period for those engines currently on-wing, but with overflown limits (based on CSN). This would result in multiple AOGs on the Effective Date of the proposed AD.

Request:

Lufthansa must determine a completely insufficient basic documentation to PAD 24-136. There is an extensive need for clarification required incl. document revision prior release of the final AD.

Therefore, Lufthansa requests to defer the release of the proposed AD until Q1 2025, to allow an implicit and reasonable clarification to items 1-3 and the revision of the CIR Manual.

### **EASA response:**

- A. **Comment noted and agreed. Rolls-Royce issued Time Limits Manual (TLM) T-TRENT-9RR Revision 68. This revision removes the cyclic limitation associated with inspection of the tubes.  
EASA amended PAD 24-136R1 accordingly.**
- B. **Comment noted and agreed. Rolls-Royce issued the Cleaning, Inspection and Repair (CIR) Manual Revision 181 incorporating Task 72-00-00-200-801 “Examine the IP8 Air Tubes”.  
EASA amended PAD 24-136R1 accordingly.**
- C. **Comment noted. Rolls-Royce issued TLM T-TRENT-9RR Revision 68. This revision of the TLM mandates inspection of IP8 Air Tubes at engine refurbishment or overhaul shop visits, only. Consequently, no grace period is necessary anymore.  
EASA amended PAD 24-136R1 by referring to TLM T-TRENT-9RR Revision 68 which addresses this comment.**



**Commenter 2: All Nippon Airways CO., LTD. – Shinya Fujita – 11/12/2024**

**Comment # 2**

- A The Mandatory Inspection procedure for IP8 Air Tubes newly established in TLM Rev. 67, TASK 05-20-01-800-801. However, the CIR Task in the TLM has not been published, yet. Therefore, the inspection in accordance with the CIR Task is not available and the AMP cannot be revised. Rolls Royce temporarily issued Repeater TV257089 which is an advance issue of the CIR task. We request to revise the AD to make RTV257089 as an alternative approved inspection procedure.
- B CIR tasks referred to in the TLM are for Off Wing Engines. Is it correct that the AD instructs to revise the AMP to incorporate the New and/or more restrictive tasks which require the engine removal?

***EASA response:***

- A. *Comment noted and agreed. Rolls-Royce issued the CIR Manual Revision 181 incorporating Task 72-00-00-200-801 “Examine the IP8 Air Tubes”. Additionally, credit was granted adding new paragraph (5) in the PAD 24-136R1 recognising Rolls-Royce Technical Variation (TV) 257089 to be equivalent to Trent 900 CIR Manual Task 72-00-00-200-801. EASA amended PAD 24-136R1 accordingly.***
- B. *Comment noted. Rolls-Royce issued TLM T-TRENT-9RR Revision 68. This revision does not introduce extra engine removals, only inspection task when the engine is removed for refurbishment or overhaul shop visits. The AMP should be updated to reflect the requirements for in shop inspection of the IP8 tubes.***
- No changes have been made to the PAD 24-136R1 in response to this comment.***

