

COMMENT RESPONSE DOCUMENT

EASA PAD No. 24-142

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Commenter 1: ALL NIPPON AIRWAYS CO.,LTD – Katsuya Saiki – 12/12/2024

Comment # 1

- A. TLM 05-20-01-800-801 has a requirement to make sure that 20 new bolts (72-41-14, 01-453) are installed. This means that there are duplicable requirements for this bolts replacement with different compliance. ANA would like to clarify whether the replacement of CRIC bolts according to the EM or CRM described in the TLM is an acceptable alternative to in-shop replacement as defined in this AD. In addition, ANA would like to clarify whether replacing CRIC bolts in-shop in accordance with this AD is an acceptable alternative to "Additional mandatory inspection at assembly;" in the TLM. Could you tell us EASA's opinion, please?
- B. Definitions: Since the definition of "Affected part:" is explained using "Serviceable part:", ANA considers that it would be easier to understand if the order in which the two are listed should be reversed, or "~ a serviceable part in this AD" should be added at the end of the sentence in "Affected part:".
- C. Required Action(s) and Compliance Time(s): "Modification:" requires that the modification be made within 155 months after the effective date of the AD. Should the engine undergoing a qualified shop visit at 155 months after the effective date of the AD be done the modification SB before the next engine installation? Or must the modification be completed by 155 months after?

EASA response:

- A. ***Comment agreed. In-shop replacement of the Combustion Rear Inner Case Bolts in accordance with the instructions of the NMSB ALERT RB211 72-AJ698 meets the safety intent of the Rolls-Royce Time Limit Manual (TLM) T-TRENT-9RR, maintenance task 72-41-14, 01 453 and provides alternative method to TLM T-TRENT-9RR, maintenance task 72-41-14, 01 453.***
We have amended the Final AD accordingly.
- B. ***Comment noted. The Affected Part definition position is driven by the order the Affected Part and the Serviceable Part are referenced in the Required Action and Compliance Time section.***
No changes have been made to the Final AD in response to this comment.
- C. ***Comment noted. The modification required by paragraph (2) of the AD shall be done during the time period ending 155 months after the effective date of the AD.***



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

