

COMMENT RESPONSE DOCUMENT

EASA PAD No. 24-145

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Commenter 1: South African Airways Technical – Andrew Mundy – 13/12/2024

Comment # 1

South African Airways Technical (SAAT), providing CAMO services to an A330-800 operator, want to raise a concern about the AD proposed in PAD 24-145. The PAD requires modification of the engine fire extinguisher assemblies by replacing the extinguisher discharge heads with discharge heads manufactured from different material. Airbus SB A330-26-3076 and Meggitt Safety Systems INC SB 52002066-26-01 are referenced in PAD 24-145. As currently worded, the AD will force a removal of the fire extinguishers to be modified in a suitable workshop. Removal of the extinguishers will cause a great inconvenience and additional cost to the aircraft operator. A review of the A330 AMM revealed that the AMM contains procedures to remove and install fire extinguisher discharge heads. These existing procedures, together with re-identification of the extinguisher, can be used on in-service fire extinguishers to achieve the same modification which will result from a workshop visit.

For information, SAAT has communicated the same proposal to Airbus for a revision to Airbus SB A330-26-3076 to allow the option of modifying fire extinguishers without a shop visit.

Please review the wording, or add additional paragraphs to PAD 24-145, to allow operators to perform this modification using existing AMM discharge head removal and installation procedures. Performing this modification without incurring an extinguisher shop visit will ease the financial and logistical burden on operators.

EASA response:

Comment Noted. It is expected that the Meggitt Safety Systems INC SB 52002066-26-01 will be revised to allow modification of affected parts on wing. Under the standard provision: 'The use of later approved variations or revisions of the above-mentioned document is acceptable for compliance with the requirements of this AD', it is confirmed that the current Airbus SB, or its possible amendment considering the Meggitt Safety Systems INC SB future revision, can be accomplished for compliance with the requirements of the AD.

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

