

COMMENT RESPONSE DOCUMENT

EASA PAD No. 24-146

[Published on 04 December 2024 and officially closed for comments on 03 January 2025]

Commenter 1: Qatar Airways – Yacoob Jugoo – 12/12/2024

Comment # 1

Ref.1: PAD 24-146

Ref.2: Airbus SB A350-29-051 Rev.00

Ref.3: Airbus SBIT 24-0065 Rev.00

Ref.1 mentions that the AD will have a deadline of 6 months from its effective date for the accomplishment of Ref.2 on Group 1 aeroplanes (those that have Hydraulic Monitoring and Control Application (HMCA) software (SW) S4.2 standard installed.). However, Airbus recently informed via Ref.3 of a discrepancy in the kit PN 29P051D01R00 where wires with incorrect identification are supplied in bundle PN V925311000095D. Ref.3.

Further to the discrepancy in the wiring bundle, Airbus highlighted that supply of the affected kit is on hold and will resume after rectification and therefore accomplishment of Ref.2 is currently not possible. This situation will prove a challenge for operators to comply with a 6 months deadline unless the combination of effective date, grace period and deadline is generous.

EASA response:

Comment #1 not agreed. The Risk Assessment doesn't allow for the introduction of a grace period nor a more relaxed compliance time. Additionally, Airbus has published SB A350-29-051 rev 1 which contains dedicated instructions allowing for local manufacturing and correct identification of the wires previously sent as part of the Airbus' kit, so while kits with correctly identified wires are now being dispatched the instructions provided by Airbus allow for a workaround to the problem described, in case an operator has been provided with a kit with the incorrect wires. The PAD revision 1 additionally refers to SB A350-29-051 revision 01.

Commenter 2: Parker Hannifin Ltd – Don Bolton – 16/12/2024

Comment #2

Parker-Hannifin Corporation by and through the Hydraulic Systems Division of its Aerospace Group (HSD), has reviewed EASA PAD No. 24-146, issued on 04 December 2024, entitled “ATA 29 – Hydraulic Power – Engine Driven Pump – Software Update / Modification” and would like to comment on one PAD paragraph and provide proposed alternative wording.

PAD Paragraph that HSD is commenting on:

On PAD page 2, under the section entitled “Reason”, the second paragraph states: “This condition, if not corrected, leads to a non-compliance to the quantitative safety objective for the “uncontrolled EDP CD overheat” failure condition, due to the repetitive nature of those overheat events.”

HSD’s concern with this Paragraph:

The use of the term “non-compliance” should be used with respect to a “requirement” not an “objective”. HSD believes that the following alternative language more accurately characterizes the issues currently preventing compliance to the fuel tank safety requirements.

HSD’s proposed alternative wording:

The following alternative wording is proposed: “When the current rate of in-service EDP failures cascading to system overheat is considered in combination with the availability/reliability of the system mitigation means, the system safety analysis reveals a non-compliance to the fuel tank safety requirements defined in CS25.981.”

EASA response:

Comment #2 partially agreed. The text in PAD revision 1 has been modified, however, not fully reflecting what the Commenter suggested.

Commenter 3: Singapore Airlines Limited (SIA) – Victoria Cheong – 02/01/2024

Comment # 3

SB 29-P051 Revision 1 issued 20 December 2024, affects 35 aircraft in SIA A350 fleet under Group 1. SB Revision 1 addresses the additional work done for aircraft embodied with the incorrect wire P/N through an additional part kit. In addition, Airbus also highlighted that new part kits with correct wire P/N should be ordered to replace the incorrect wire P/N from the SB Revision 0 modification kits.

A total of 9-off SB Revision 0 modification kits were delivered to SIA and the new SB Revision 1 modification kits would not be available until January 2025. Currently, only 3 aircraft have been embodied (A350 aircraft MSN 62, 68 and 238).



With the AD expected to release in January 2025, there is time constraint to complete embodiment for the remaining 32 aircraft in SIA A350 fleet within the given compliance time of 6 months from the effective date of the AD. Furthermore, this does not take into consideration for any delay in modification kit availability. More time should be factored in for compliance of the AD, for operators with large A350 fleet to complete the required SB embodiment.

EASA response:

Comment #3 agreed. See reply to Comment #1

Commenter 4: Delta Air Lines, Inc. – Justin Brown – 03/01/2024

Comment # 4

Reference:

- (A) EASA Proposed Airworthiness Directive: PAD No. 24-146, dated 04 Dec 24
- (B) Airbus SB A350-29-P051 original issue dated 28 October 2024
- (C) Airbus SB A350-29-P052 original issue dated 28 October 2024
- (D) Airbus SB A350-42-P020 original issue dated 10 August 2023

I.

Commenter Request

Modify Ref (A) PAD, to add statement exempting MSNs not listed in Ref (B) SB or Ref (C) SB Applicability paragraphs from accomplishing Paragraphs (1) Modification and (2) Concurrent Requirements / Additional Modification.

Request justification

Ref (A) PAD applicability includes all MSNs except aeroplanes that embodied MOD 116830, and Group 2 aeroplanes are those that have HMCA SW S5.0 standard installed. As of Ref (A) PAD consultation closure date (03 JAN 2025), DAL has multiple aeroplane MSNs applicable to Group 2 definition, except MSN 661 and later MSNs with MOD 116830 embodied in production.

Paragraph (1) of Ref (A) PAD requires Group 2 aeroplanes to accomplish Ref (C) SB. Paragraph 1.A.(2) of Ref (C) SB does not include DAL MSNs. As currently written, DAL cannot comply with the forthcoming EASA AD requirements because service bulletin applicability does not include DAL MSNs.

List paragraphs that change; describe (nonobvious) changes

New Exception paragraph to be added to the Ref (A) PAD.



II.

Commenter Request

Modify Ref (A) PAD, to add statement clarifying if “prior to or concurrent” service bulletins referenced in Ref (D) service bulletin must be accomplished in addition to the concurrent requirements / additional modification paragraph of Ref (A) PAD.

Request justification

Paragraph 1.B of Ref (D) service bulletin lists six service bulletins that must be accomplished prior to or concurrent with Ref (D) service bulletin. Upon further review, each of these six service bulletins require additional service bulletins to be accomplished prior to or concurrent with their associated higher-level service bulletin.

Operators need to know if the Required Action(s) and Compliance Time(s) of Ref (A) PAD includes all levels of concurrent requirements referenced service bulletins to plan accomplishment schedule.

List paragraphs that change; describe (nonobvious) changes

Concurrent Requirements / Additional Modification Paragraph of Ref (A) PAD:

- Add statement that all concurrent requirements listed in Ref (D) service bulletin, including concurrent requirements from lower-level service bulletins, must be accomplished.

-or-

- Add statement that concurrent requirements listed in Ref (D) service bulletin are not required to comply with the Ref (A) PAD.

Table 1 - Modification

- Re-evaluate/update the Compliance Time of Groups 1 and 2 if all concurrent requirements listed in Ref (D) service bulletin, including concurrent requirements from lower-level service bulletins, must be accomplished.

EASA response:

Comment #4 I not agreed. *The requirements as stipulated in the EASA PAD are correct and remain applicable to all concerned aircraft. DAL is encouraged to contact Airbus so to be provided with an updated Service Bulletin extending the applicability of Ref (C) to all the DAL aircraft falling into the Group 2 definition and liaise with the FAA as necessary.*

Comment #4 II not agreed. *The PAD concurrent requirement (2) covers the minimum prerequisite to embody the modification required as per (1). The embodiment of such prerequisite SB A350-42-P020 should be done as per standard practices and must lead to a certified configuration. Such certified configuration is achievable complying with all instructions in such SB, hence embodying also all SBs therein listed in the Concurrent Requirement paragraph 1.B.*

Any deviation to such Concurrent Requirement SBs' content must be assessed/managed/approved in accordance with a system acceptable to the State of Registry National Aviation Authority.

The Risk Assessment doesn't allow for any compliance time change/relaxation.

No changes have been made in the PAD revision 1 in response to these comments.

