

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-018

[Published on 29 January 2025 and officially closed for comments on 26 February 2025]

Commenter 1: Singapore Aero Engine Services Private Limited – Muhammad Hazmi – 13/02/2025

Comment # 1

Para (6) of the AD allows the use of TV265450 (approved for use since 26 June 2024) as an acceptable method to comply with the initial inspection. Therefore, subsequent repeat inspections should be carried out per NMSB 72-AL186.

What constitutes as an initial inspection? Is it referring to the first inspection since the effective date of the AD or it is referring to the first inspection in accordance with TV265450 (even before the effective date of the AD)?

Acceptable Method:

- (6) Accomplishment of the inspection on an engine in accordance with the instruction of the Rolls-Royce Technical Variance TV265450 is an acceptable method to comply with the initial inspection as required by paragraph (1) of this AD for that engine.

EASA response:

Comment noted. The initial inspection is the first inspection required by paragraph (1) of the AD. This is required to be accomplished through NMSB RB211 72-AL186 or accepted in accordance with the Rolls-Royce Technical Variance TV265450, as refereed in paragraph (6) of the AD.

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

Commenter 2: Deutsche Lufthansa AG – Patrick Körber – 25/02/2025

Comment # 2

NMSB 72-AL186 refers to accomplishment of CIR Task 72-31-20-200-801 and Subtask 72-31-20-240-001 “Do a Crack Test (MPI) on the Threads 7”.

Trent 900 TLM T-TRENT-9RR Task 05-20-01-800-801 Para. D does also refer to CIR Task 72-31-20-200-801.



Based on this Lufthansa's proposal to the final AD is:

- A §1 Inspections: To include accomplishments of CIR-TRENT-9RR Manual 72-31-20-200-801 dated 01 January 2025 or later as accomplishment task also for the repetitive inspections and delete "before the effective date of this AD".
- B Revise Definition of the Serviceable part: "[...] or after having passed (no discrepancy found) an inspection in accordance with the instructions of the NMSB or CIR-TRENT-9RR Manual 72-31-20-200-801 dated 01 January 2025 or later [...]"

EASA response:

Comment noted

A. Paragraph (1) in definition of the initial inspection requires that the first inspections shall be done before exceeding 8 000 EFC since installation of the LPC rotor shaft having P/N FW21472 on an engine or since the accomplishment CIR-TRENT-9RR Manual 72-31-20-200-801, if such inspection was done before the effective date of the AD. After that initial inspection, the repetitive inspection needs to be accomplished with an interval of 8 000 EFC. The AD mandates that the inspection shall be accomplished in accordance with the instructions of the ALERT RB211 72-AL186 which in turn calls also for CIR-TRENT-9RR Task 72-31-20-200-801.

EASA intention is to mandate that the inspections after the effective date of the AD be accomplished in accordance with the ALERT RB211 72-AL186 and not only accomplishment of CIR-TRENT-9RR Manual 72-31-20-200-801.

The expression "before the effective date of this AD" in definition of the initial inspection (i.e. the first mandated inspection) serves the purpose to give credit for CIR-TRENT-9RR Manual 72-31-20-200-801 if this inspection happened in the past (before the effective date of the AD). Otherwise, the first inspections would be due before exceeding 8 000 EFC since first installation on an engine.

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

B. Accomplishment of the CIR-TRENT-9RR Manual Task 72-31-20-200-801 "Examine the LP Compressor Shaft Assembly" is referenced in the NMSB ALERT RB211 72-AL186 and expanding the Serviceable Part definition appears redundant.

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

Commenter 3: ALL NIPPON AIRWAYS CO.,LTD – Katsuya Saiki – 26/02/2025

Comment # 3

A. Definition of Serviceable Part

Does a part that has a defect in the CIR Inspection and is repaired as repairable fall under the category of No Discrepancy Found?

B. All Trent 900 engines are equivalent to Group 1 as there are no alternative parts for FW21472 at this time.



Is the intention of setting Group 2 in anticipation of a revised LPC rotor shaft to be released in the future?

C. Relationship with TLM

In accordance with TLM Task 05-20, inspections at the Piece Parts Level are mandatory in accordance with CIR 72-31-20-200-801, but the only Compliance reference in the NMSB/AD is 8000EFC.

As the MPI has already reflected in the latest CIR, I think that the Mandatory Inspection in accordance with the TLM can be considered to be equivalent to this AD work, but is that understanding correct?

If correct, ANA believes that SB should be cancelled and TLM Mandatory Inspection should be set to inspect every 8,000 EFC in the future.

D. Part Installation

Since the Group 2 engine is approved for installation of the Affected part, it is possible to change from Group 2 to Group 1 engine.

If the modified parts are released in the future, they will become a de-modification. Will you be revising this AD at that time?

EASA response:

Partially agreed:

A. A part inspected and repaired within the scope of CIR-TRENT-9RR Manual Task 72-31-20-200-801 “Examine the LP Compressor Shaft Assembly” is considered that passed the inspection and airworthy. To increase the clarity, the definition of the Serviceable Part(s) was updated removing the “no discrepancy found” condition.

The Final AD has been amended accordingly in response to this comment.

B. At the time of the AD issuance, it cannot be excluded that new LPC rotor shaft P/Ns may be certified in the future.

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

C. The TLM Task 05-20-01-800-801, inspections at the Piece Parts Level, does not incorporate a threshold defined in EFC. The NMSB mandated by the AD is a temporary measure, with plan to consider a design change to rectify the issue in the future. Consequently, a permanent revision of the TLM to introduce an 8 000 EFC limit on the part is not the preferred service management strategy.

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

D. Theoretically, installation of a LPC rotor shaft having P/N FW21472 on Group 2 engines (i.e. on engines equipped with a shaft having a P/N different from P/N FW21472) shall be accomplished using approved de-modification instructions. The purpose of the paragraph (4) is not to serve as such de-modification instruction or approval.

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

