

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-116

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Commenter 1: All Nippon Airways Co., Ltd. – Shohei Hayashi – 27/08/2025

Comment #1

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Modification

(1) For Group 1 engines: From the effective date of this AD, before an affected part installed on an engine exceeds 6 500 flight cycles (FC) since its first installation on an engine (see Note 1 of this AD), or within 30 days after the effective date of this AD, whichever occurs later, remove that engine from service and, before release to service of that engine, modify the engine in accordance with the instructions of the modification SB.

[SB]

Compliance

(1) ON-WING

For all engines listed in section 1.A., the engine shall be removed and SB 72-K661 embodied before the LP turbine seal panel has accrued 6500 flight cycles in accordance with section 3.A. This will be the terminating action for the NMSB.

ANA comment #A

(1) SB states that the modification to Post 72-K661 can be carried out within 6500 flight cycles. also SB states that the implementation of POST 72-K661 is merely a terminating action.

On the other hand, PAD states that if the engine is removed due to life limit requirements, the modification to POST 72-K661 is mandatory. I would like to clarify whether the legal content is that the modification to POST 72-K661 must be carried out before 6500 flight cycles are reached.

For example, if ANA removes the engine (that has reached 6400 flight cycles) and changes the affected parts to serviceable parts (non-modified parts), does it contradict AD?

We believe that the difference in legal requirements, where SB provides instructions for parts and AD provides instructions for engines, causes ambiguity.

The discrepancy in legal requirements, with SBs addressing parts and ADs addressing engines, is considered to be the source of questions regarding compliance. I hope that the distinction in instructions between SBs for parts and ADs for engines leads to uncertainty in legal requirements.

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In-Shop Inspection

(2) For Group 1 engines: During each qualified shop visit after the effective date of this AD, inspect the outer weld of the affected part in accordance with the instructions of the NMSB; or before the affected part exceeds 6 500 FC since its first installation on an engine modify the engine in accordance with the instructions of the modification SB, as applicable.

For an engine that, on the effective date of this AD, is in a shop visit where substantial rebuild has not yet started, before release to service of that engine, inspect the affected part in accordance with the instructions of the NMSB, unless the engine is modified during that shop visit in accordance with the instructions of the modification SB.

[SB]

(2) IN-SHOP

For all engines listed in section 1.A., clean and inspect the LP turbine seal panel in accordance with section 3.B. whenever the rear of the IP turbine module is exposed, unless the LP turbine seal panel is going to be replaced. This is also applicable for engines that are currently in-shop at the time of issuing this NMSB where substantial rebuild has not yet started.

For all engines listed in section 1.A., the LP turbine seal panel shall be replaced and SB 72-K661 embodied in accordance with section 3.B. before it has accrued 6500 flight cycles. This will be the terminating action for the NMSB.

ANA comment #B

(2) SB does not require inspection if **replacement** is planned, but AD does not require inspection only if **repair** is planned.

This means that panels that are close to the life limit, will also have to be inspected, so I would like the AD description to match that of SB.

(3) The AD states that inspection is required during a Qualified shop visit, but the red underlined phrasing "in a shop visit" can be interpreted to include all shop visits. Please clarify whether this shop visit includes visits other than Qualified shop visits.

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Parts Installation

(6) For Group 1 engines: From the effective date of this AD, it is allowed to install on any engine an affected part, provided that the part is a serviceable part, as defined in this AD, and that, following installation, the affected part is inspected as required by paragraph (2) of this AD and the engine is modified as required by paragraph (1) of this AD, or as specified by paragraph (2) of this AD.

ANA comment #C

(4) Is "and" an error for "or"? If it's "and", it implies both inspection and modification are required, which is contradictory.



(5) Please clarify what "as specified by paragraph (2)" refers to. Does it refer to the sentence "For an engine that, ----" written above?

But if so, for engines already in the shop after the AD effective date, undergoing substantial rebuilds only need to be inspected according to SB Original?

EASA response:

Comment A:

EASA agrees. The original intent of the consulted wording was to permit the installation of affected parts classified as serviceable parts. Paragraph (6) has been revised to more clearly reflect this intent. In the event of any discrepancy between the wording of the Service Bulletin (SB) and the Airworthiness Directive (AD), the wording of the AD shall prevail and must be followed.

The final AD has been amended accordingly.

Comment B:

EASA partially agrees with the comment. The paragraph (2) of the AD does not use the wording "repair". Paragraph (2) requires either inspection or modification, depending on the service life accumulated by the affected part, during the next qualified shop visit which happens after the effective date of the AD. Paragraph (2) does not require concurrent accomplishment of the inspection and the modification.

The wording of the 2nd subparagraph of the paragraph (2) of the AD was amended in response to this comment.

Comment C:

The use of "and" is intentional. Paragraph (6) allows installation of affected parts (LPT seal panels having P/N FW33370, P/N FW52161, or P/N KH20207 having accumulated below 6 500 FC service life) under condition, that these parts are inspected as required by paragraph (2) AND modified as required by paragraph (1), when (before) the affected part reaches 6 500 FC.

The wording "...or as specified by paragraph (2) of this AD" used in paragraph (6) refers to (includes) the modification of the engine during the qualified shop visit instead of its inspection per paragraph (2).

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

