

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-118

[Published on 31 July 2025 and officially closed for comments on 28 August 2025]

### Commenter 1: British Airways – Hugh Cherkas – 18/08/2025

#### Comment #1

Item (6) of “Corrective Action(s)” states that any engine inspected iaw AMM Task B787-A-R72-00-00-23C-280C-A with a follow-on action required with an interval of less than 50FC must have Area C4 inspected iaw the instructions of the NMSB at the follow-on inspection.

As per the AMM task, a Maximum Time Limit of “50 flight cycles or 300 flight hours.” is applicable to multiple areas and damage types. Note [5] specifies to use whichever limitation occurs first of the FC or FH.

In the event of an inspection iaw Task B787-A-R72-00-00-23C-280C-A, with sentencing to a 50FC/300FH follow-on inspection, when referencing item (6) of the Corrective Actions:

- The 50 flight cycle limit is not less than 50, hence Corrective Action item (6) does not apply?
- Item (6) does not specify an hours-based requirement. But 300 FH may be consumed well before 50 FC for operators with an average stage length of >6 hours.

Please clarify the intent of Item (6). Should an operator consider hours-based limitations which may result in reinspection in less than 50FC, or should an operator consider only cycle-based limitations of less than (only less, and not equal to) 50 FC?

#### **EASA response:**

***Comment noted. The maximum interval between inspections should not exceed 50 FC after the affected parts have reached 500 FC. Additionally, Operators should consider any hours-based limitations if this would drive a re-inspection of damage sentenced in accordance with the AMM at less than 50 cycles and inspect the affected parts in accordance with NMSB TRENT 1000 72 AK316 Revision 6.***

***The wording of paragraph (6) of the final AD was amended accordingly.***

### Commenter 2: ALL NIPPON AIRWAYS CO.,LTD – Katsuya Saiki – 19/08/2025



**Comment #2***(Reference)**Definitions:**Affected part: High pressure turbine (HPT) blades, having Part Number (P/N) KH10575 (pre-mod/SB 72-J550), or P/N KH64485 (post-mod/SB 72-J550).**Serviceable part: An affected part which is new (never previously installed).***1-1. Corrective Action(s):**

(4) and (5) instruct that the affected parts be replaced with a full set of serviceable parts as defined in this AD.

According to the above definition, ANA understands that the serviceable parts refer to a new manufactured P/N KH10575 or P/N KH64485.

Therefore, the HPT blade introduced in SB TRENT 1000 72-K335 is not included in the definition of the serviceable parts.

ANA would like to clarify whether the installation of the HPT Blades of SB TRENT 1000 72-K335 standard is permitted as an acceptable method to comply with Corrective Action(s): (4) and (5).

**1-2. Corrective Action(s):**

ANA thinks (4) should be Table 2, not Table 3. This is just a comment, as it does not affect the content.

**2-1. a follow-on action**

ANA would like to clarify what exactly is meant by “follow-on action” as described in (6).

Is this different from the “Follow-On Inspection:” described on the previous page in this PAD?

**2-2. a follow-on action**

Regarding (6) and (6.1), based on the results of the AMM Task B787-A-R72-00-00-23C-280C-A inspection, is it sufficient to perform this inspection only when CONTINUED USE is permitted with a repeat interval of less than 50 FC?

For example, if the engine removal is determined to be within 10 FC or 60 FH iaw AMM Task, is this inspection unnecessary?

**2-3. a follow-on action**

Regarding the AMM inspection results, the one-off or repeater Technical Variance is issued by Rolls-Royce, and if that Technical Variance allows a repeat interval of more than 50 FC for confirmed defects that originally require a reduced inspection with a repeat interval of less than 50 FC according to the AMM criteria, ANA would like to clarify whether (6.1) must be performed in this case?

**3. Optional Terminating Action:**

ANA requests to change "for repetitive inspections required by this AD" to "for the requirement of this AD" because the modification in accordance with SB TRENT 1000 72-K335 is a complete terminating action.



The intention is to clarify that SB TRENT 1000 72-K335 is also a terminating action for Inspection(s): (2).

#### 4-1. **SB TRENT 1000 72-K335**

ANA would like EASA to confirm that advance issues (by Technical Variance) of "current overhaul procedures" referred to by SB TRENT 1000 72-K335 Accomplishment Instructions (Paragraph 3.B through 3.D) can be used as an alternate procedure of SB TRENT 1000 72-K335 Accomplishment Instructions (Paragraph 3.B through 3.D), and as Optional Terminating Action of this AD.

#### 4-2. **SB TRENT 1000 72-K335**

Rolls-Royce has issued overhaul procedures for Post SB TRENT 1000 72-K335 configuration as advance issue of "current overhaul procedures" by Technical Variance. ANA would like EASA to confirm that these Technical Variance can be used as an alternate procedure of SB TRENT 1000 72-K335 Accomplishment Instructions (Paragraph 3.B through 3.D), and as Optional Terminating Action of this AD.

#### 4-3. **SB TRENT 1000 72-K335**

ANA would like EASA to confirm that alternate marking procedures of SB TRENT 1000 72-K335 Accomplishment Instructions (Paragraph 3.D.(3)) can be used if Rolls-Royce accepts to use procedures as an alternative to SB TRENT 72-K335 Paragraph 3.D.(3) by Technical Variance.

#### 4-4. **SB TRENT 1000 72-K335**

ANA would like EASA to confirm that it is permitted to instruct the replacement of parts necessary to comply with the old configuration described in SB TRENT 1000 72-K335 at the same time as SB TRENT 1000 72-K335.

For example, the Combustion Rear Inner Case (CRIC) introduced in the SB TRENT 1000 72-K335 requires the SB TRENT 1000 72-K088 to be implemented as a prerequisite, but since this SB is optional, it is not introduced in all engines.

#### ***EASA response:***

***1-1: Comment agreed. The definition of the Serviceable part(s) was expanded adding HPT blade having P/N KH83037.***

***We have amended the Final AD accordingly.***

***1-2: Comment agreed. We have amended the Final AD accordingly.***

***2-1: Comment noted. The term "follow-on action" referenced in paragraph (6) refers to maintenance actions that result from accomplishment of the inspection in accordance with the Boeing AMM Task B787-A-R72-00-00-23C-280C-A. If the AMM inspection results in a requirement to inspect the engine earlier than 50 FC, affected parts should be inspected during this opportunity as well in accordance with NMSB) TRENT 1000 72 AK316 Revision 6.***

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

***2-2: Comment noted. The intent is only under conditions of "continued use", i.e under a repeat inspection, then inspection should also be carried out concurrently on the Convex Area C4. If the follow-on action is limited to engine removal, then the engine is sentenced and there is no further requirement, upon removal, to conduct further inspections.***



*For clarity we have amended the wording of the paragraph (6) of the Final AD accordingly.*

*2-3: Comment noted. Referenced Technical Variances are not EASA approved documents. The Operator can reach to RR for additional technical assessment captured in a TV. However, the mandatory actions captured in the AD should be followed as described as minimum.*

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

*3: Comment noted. The primary requirement of the AD is the accomplishment of repetitive inspections. Corrective actions are only required if findings are identified during those inspections. The wording used in paragraph (7) correctly states that the modification constitutes a terminating action for the repetitive inspections. Once these inspections are no longer required, any follow-on actions that would have resulted from their findings are also no longer applicable.*

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

*4-1: Comment noted. Referenced Technical Variances are not EASA approved documents. Any alternative methods of compliance to an EASA AD needs to be requested through an official AMOC request.*

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

*4-2: See reply to comment 4-1.*

*4-3: Comment noted. Referenced Technical Variances are not EASA approved documents. Any use of information approved through a RR TV lies within the operator maintenance responsibilities.*

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

*4-4: Comment noted. The replacement of parts is covered in Section 2 Material Information of SB72-K335. In the case of the CRIC, SB72-K335 Section 2 shows that this can only be applied from the KH8828 standard (SB72-K088). There is no OLD PART / NEW PART route for the KH38014 (pre-SB72-K088) CRIC. SB72-K335 does not therefore allow rework direct from pre-SB72-K088 engines.*

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

### **Commenter 3: Deutsche Lufthansa AG – Patrick Körber – 13/08/2025**

#### **Comment #3**

Lufthansa has reviewed PAD 25-118 and provides the following comments:

- A. Applicability: Exclude ESNs post-mod 72-K335 / with P/N KH83037 HPT blades installed from the Applicability of the final AD.
- B. Inspection §2:



- (i) Lufthansa proposes to exclude commanded IFSDs (e.g. due to Maintenance Check Flights) and to limit this inspection to engines with more than 550 FC since first flight.
- (ii) Include this requirement into AMM Task 787 AMM Task B787-A-R71-00-00-30L-280A-A – Power Plant (after in-Flight Stop) – Inspection.

***EASA response:***

***A. HPT blades with P/N KH83037 are not in the Affected Part definition. Therefore, this AD will not apply to engines that have KH83037 incorporated.***

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

***B.(i) The inspection from paragraph (2) applies to all instances of IFSDs not limited to HPT blades occurrences for all engines without a FC limit.***

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

***B.(ii) Comment noted. The AMM content is a responsibility of the airframer and the airframer needs to be contacted with requests for ICA change. The appropriate inspection is currently captured within NMSB 72-AK316 and will remain as reference in the AD.***

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

