

COMMENT RESPONSE DOCUMENT

EASA PAD No.: 26-065

Published on 13 May 2026 and officially closed for comments on 10 June 2026

Commenter 1: SAESL Quality – Muhammad Hazmi – 25/05/2026

Comment # 1

SAESL would like to seek clarification on EASA PAD 26-065.

- (2) For Group 1 engines in pre-SB Trent 1000 72-K771 configuration: Within the compliance time defined in Table 1 of this AD inspect front seal fins of each affected part in accordance with the instructions of the NMSB.

Table 1 – Compliance time referenced in paragraph (2) of this AD

A, B, C or D, whichever occurs first	
A	During each engine refurbishment shop visit as defined in Trent 1000 Engine Management Programme (RM1907)
B	During modification of an engine in accordance with the instructions of SB Trent 1000 72-K771
C	During each replacement of the LP turbine stage 3 disc P/N KH36323
D	Before exceeding 7 800 EFC accumulated by the LP turbine stage 4 disc P/N KH33943 since new (first installation on an engine)

- A. Para (2) mandates the inspection of seal fins of each affected parts within the compliance time defined in Table 1 of the AD. For compliance time “C”, does the LPT STG 3 Disc that is to be replaced also require inspection?
- B. What will be the compliance times for repetitive inspection after the initial inspections are performed within the compliance time defined in Table 1 of the AD?

(7) Repair of an LP turbine stage 3 disc P/N KH36323 in accordance with the instructions of Rolls-Royce approved Technical Variance does not constitute terminating action for repetitive in-shop inspections as required by paragraph (1) and (2) of this AD, as applicable, for that part, unless stated otherwise in that TV.

C. RR TV does not constitute termination action unless stated otherwise in that TV. We would like to clarify if AMOC for the TV is not required to terminate the AD since it is stated in the AD.

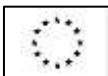
Part Installation:

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

D. For clarity, SAESL would like to request EASA to amend Para (8) as follows: *“For Group 1 and Group 2 engines: From the effective date of this AD, it is allowed to install an affected part on any engine provided that it is a serviceable part”*.

EASA response:

- A.** *Comment noted. The inspection of the LP turbine stage 3 disc P/N KH36323 is not required when the disc has consumed its maximum approved life, is replaced by another LP turbine stage 3 disc, and the removed disc is sentenced for discard. No changes have been made to the Final AD in response to this comment*
- B.** *Following completion of the initial inspections required within the compliance time defined in Table 1 of the AD, the follow-on (repetitive) inspections must continue in accordance with the same triggers listed in Table 1. These triggers remain applicable for all subsequent inspections. Specifically:*
- *During each engine refurbishment shop visit — Table 1, Item A requires inspection “during each engine refurbishment shop visit as defined in Trent 1000 Engine Management Programme (RM1907)”.*
 - *N/A — Table 1, Item B applies only when the engine is being modified in accordance with SB Trent 1000 72-K771. Once the initial inspection has been completed, this trigger does not create a repetitive interval. The engine becomes subject of paragraph (1) of the AD.*
 - *During each replacement of the LP turbine stage 3 disc — Table 1, Item C requires inspection “during each replacement of the LP turbine stage 3 disc P/N KH36323”.*



- *Before exceeding 7 800 EFC accumulated by the LP turbine stage 4 disc P/N KH33943 — Table 1, Item D requires inspection “before exceeding 7 800 EFC accumulated by the LP turbine stage 4 disc P/N KH33943 since new”.*

These triggers remain valid after the initial inspection because paragraph (2) of the AD explicitly ties compliance to Table 1, and nothing in the AD resets or replaces these intervals for subsequent inspections.

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

- C.** *Paragraph (7) clarifies that a repair of the LP turbine stage 3 disc in accordance with a Rolls Royce approved Technical Variance (TV) does not, by itself, terminate the requirement for repetitive in shop inspections, unless the TV explicitly states that such termination applies. In other words, the TV may include a provision that terminates the repetitive inspection requirement, but this termination becomes effective only when it is expressly stated within that TV. It is important to note that this TV based termination is not an acceptable alternative method of compliance (AMOC) to the AD. Instead, it represents the required condition under which the AD itself recognises termination of the repetitive inspection requirement, provided that the TV explicitly includes such a statement. Therefore, no AMOC is required when the TV itself specifies that the repetitive inspections are terminated.*
- D.** *Comment agreed and the final AD is amended.
We agree. We have amended the Final AD accordingly*

Commenter 2: All Nippon Airways ANA – Keiichiro Shigeru – 10/06/2026

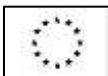
Comment # 2

- A.** Discrepancy between TLM 05-20 and PAD 26-065 regarding treatment in case of only SB 72-K771 embodied

The inspection requirements in TLM 05-20 Mandatory Inspections differ from those in the PAD. Specifically:

- TLM 05-20: Pre SB 72-K937 is required to follow SB 72-AK416, Post SB 72-K937 or FRSH970 + Post SB 72-K771, or Post SB 72-L306 are required to be inspected every 7800 cycles.
- PAD 26-065: Pre SB 72-K771 is required to be inspected at refurbishment shop visit or SB 72-K771 application or before LPT Stg. 3 disc replacement or before LPT Stg. 4 disc 7800 cycles, Post SB 72-K771 is required to be inspected every 7800 cycles.

While SB 72-K937 & SB 72-L306 requires concurrent application of SB 72-K771, it is possible that only SB 72-K771 is embodied. I understand that there is an inconsistency between TLM 05-20 and PAD 26-065 regarding the treatment of configurations where only SB 72-K771 is applied with



KH36323. Is this correct understanding? If yes, could you clarify which requirement is correct? I believe the revision of one of them is necessary to ensure regulatory consistency.

B. Applicability of SB 72-K937 as a Repair in PAD 26-065

SB 72-AK416 R02 lists "CIR FRSH970 / SB 72-K937 / TV" as repairs for a cracked LPT Stage 3 Disc. However, the PAD 26-065 only lists "CIR FRSH970 / TV." While SB 72-K937 is listed as a Terminating Action, it is unclear whether it is approved as a repair for a cracked LPT Stage 3 Disc. Is our understanding correct that applying SB 72-K937 to a cracked LPT Stage 3 Disc is approved and qualifies as a Terminating Action?

C. Rationale for SB 72-K771 Restrictions

Regarding the 'Reason' section in PAD 25-065, could you please clarify the technical rationale behind establishing restrictions based on the Pre- and Post-SB 72-K771 configuration?

D. Concurrent Requirement for SB 72-K771 (Table 1 B in Required Action(s) and Compliance Time(s))

In Table 1 B, there is no Concurrent Requirement specified in SB 72-K771. Could you confirm whether the LPT Stage 3 Disc must be disassembled to piece part level when SB 72-K771 is performed for the first time?

E. Interpretation of Replacement Instruction (Table 1 C in Required Action(s) and Compliance Time(s))

Regarding Table 1 C, does the phrase "During each replacement of the LP turbine stage 3 disc P/N KH36323" imply that this requirement applies specifically when the LPT Stage 3 Disc is disassembled to piece part level?

F. Anticipated Technical Variance (TV) in Required Action(s) and Compliance Time(s) (4)

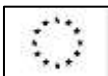
Regarding the statement that a Technical Variance (TV) is an alternative method of (3), could you clarify what type of TV is anticipated? Please share the sample of TV contents.

EASA response:

A. Comment noted. Thank you for your comment. For pre-SB 72-K771 engines, TLM 05-20 requires that the mandatory inspections are accomplished in accordance with SB 72-AK416, and this is exactly what PAD 26-065 paragraph (2) also requires. For post-SB 72-K771 engines, both TLM 05-20 and PAD 26-065 specify the same 7,800-EFC inspection interval. Therefore, EASA does not see a contradiction between the two documents regarding configurations where only SB 72-K771 is embodied. Both documents consistently reference SB 72-AK416 for pre-K771 and apply the same interval for post-K771 engines.

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

B. Comment noted. PAD 26-065 does not treat SB 72-K937 as a generally applicable repair for cracked LP Turbine Stage 3 Discs (P/N KH36323). The (P)AD explicitly identifies only CIR FRSH970 and Rolls-Royce-approved Technical Variances (TVs) as acceptable repairs for cracks detected during the inspections required by paragraphs (1) and (2). This is reinforced by paragraph (4) of the PAD, which states that "Repair of an LP turbine stage



3 disc P/N KH36323 in accordance with the instructions of task 72-52-31-300-020... or in accordance with the instructions of Rolls-Royce-approved Technical Variance (TV) is an acceptable alternative method to comply with the replacement requirement...”.

By contrast, SB 72-K937 is not structured as a repair scheme for cracked discs. Embodiment of the Service Bulletin is only permitted where the disc meets defined dimensional and defect-size limits specified in the rework process. These pre-rework limits are established to ensure that only discs with acceptable material condition are reworked, preventing excessive material removal and, critically, ensuring that discs with cracking are not returned to service.

Where these criteria are satisfied, SB 72-K937 functions as a modification rather than a repair. The disc is reworked and re-identified from P/N KH36323 to P/N LV34894, with an increased Declared Safe Cyclic Life and an extended Maximum Time Between Inspection. As stated in SB 72-K937, “The revised LP Turbine Stage 3 Rotor Disc... is physically interchangeable... however it must only be fitted to engines with ISS Stage 3 modified to SB 72-K771...”. Once re-identified as P/N LV34894, the disc is no longer an affected part under the (P)AD.

Consequently, SB 72-K937 is correctly identified in the PAD as a terminating action for the repetitive inspections required by paragraphs (1) and (2). This aligns with paragraph (5) of the PAD, which states that embodiment of SB 72-K937 “constitutes terminating action for repetitive in-shop inspections...”.

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

C. Comment noted. Rolls-Royce has reviewed engine shop visit records and confirmed that at the time of SB Trent 1000 72-K771 embodiment:

In the majority of cases the LPT 4 Disc was either inspected or replaced at the same time as SB Trent 1000 72-K771 embodiment and so known to be crack free.

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

- In the few cases where the above was not true, the engine will be inspected before 7,800 EFC as per the post SB Trent 1000 72-K771 criteria, which is acceptable.*

Therefore, it is acceptable to define the Pre- and Post SB 72-K771 populations in the NMSB.

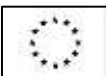
No changes have been made to the Final AD in response to this comment.

D. Comment noted. Table 1 requires that the LPT Stage 3 and 4 Discs are inspected “During modification of an engine in accordance with the instructions of SB Trent 1000 72-K771”. In accordance with NMSB Trent 1000 72-AK416 this requires the part to be disassembled to piece part level. There is no concurrent requirement specified in SB Trent 1000 72-K771.

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

E. Comment noted. Replacement of the LPT Stage 3 disc should be interpreted as “whenever the currently installed LPT Stage 3 Disc serial number is removed, and a different LPT Stage 3 Disc serial number is re-installed”.

F. Comment noted. For the Trent 1000 engine family, a Technical Variance (TV) is a document issued under the privileges of the Rolls-Royce Design Organisation Approval (DOA). TVs are used by Rolls-Royce to authorise a controlled deviation from the standard approved data—typically to



permit a specific repair, inspection method, or disposition that is not covered by the published Service Bulletins or the Cleaning, Inspection and Repair (CIR) Manual. Because TVs are proprietary and issued on a case-by-case basis, EASA does not hold or distribute sample TV content, and (P)AD does not prescribe the format or technical scope of such documents. The PAD simply recognises that a Rolls-Royce-approved TV—issued under their DOA—may serve as an acceptable alternative to replacement when addressing findings identified under paragraph (3). For detailed information on the type of TV applicable to a specific Trent 1000 LP Turbine Stage 3 Disc, or to request an example of TV content, we recommend contacting your Rolls-Royce Customer Service representative or the Rolls-Royce Technical Helpdesk, as they are the only authorised source for these documents.

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

