

EASA PAD No. 06 - 198
COMMENT RESPONSE DOCUMENT

PAD / DOC PARAGRAPH COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
Compliance	<p>After the serious study of the PAD 06-198 dated 07/08/2006 (concerning inspections and modifications related to the prevention against fuel explosions risks) by AFR Engineering, it proves that our immobilization planning until the target of 31th December 2009 does not permit to schedule all our AFR A330/A340 aircraft.</p> <p>Only 14 (fourteen) of our 16 (sixteen) A330 and 13 (thirteen) of our 19 (nineteen) A340 could be scheduled in C check or Heavy check before 31th December 2009.</p> <p>In this way thanks to take into account that an extension of a <u>24 months additional period</u> after the target date of 31th December 2009 to perform all this heavy maintenance inspections/modifications actions must be considered like mandatory by EASA.</p>	<p>Charles-David Fitoussi</p> <p>Air France Maintenance</p> <p>A330/A340 Division</p>	29/08/2006	The proposed compliance period has been determined balancing the burden put on the operators and the ignition risk within the fuel system. EASA considers that in-tank ignition prevention is the fundamental element of fuel tank safety, in the absence of a flammability reduction system.
Compliance	<p>The compliance dates of 31st December 2009 are insufficient. Some of the actions required involve in excess of 380 Man hours and 220 Hours downtime, according to the manufacturers estimates. This level of workload is best aligned with a 4C Check for which the current MPD interval is 6 Years. Operators that have recently performed these checks will be penalised.</p> <p>Requiring Fuel Tank Entry at lower intervals than this is not conducive to good maintenance practice where we are trying to minimise potential damage through unnecessary Fuel Tank Entry.</p>	<p>Steve Sells</p> <p>Airworthiness & Planning Manager</p> <p>Thomas Cook Airlines UK Ltd</p>	06/09/2006	See above response.
Ref. Publications	The sixth reference is incorrect - should be <u>A340</u> -28-4118 not <u>A330</u> -28-4118	<p>Steve Sells</p> <p>Thomas Cook Airlines UK Ltd</p>	06/09/2006	This typo has been corrected.