



COMMENT RESPONSE DOCUMENT
EASA PROPOSED AIRWORTHINESS DIRECTIVE (PAD) No. 09-039
CLOSED FOR COMMENTS ON: 10 March 2009

PARAGRAPH OR SECTION COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
Required Action and Compliance Time	In regard of above mentioned PAD 09-039 LHT does have the following question: What is meant in § Required Action and Compliance Time, 1) ? 1. If at the effective date of this Airworthiness Directive the engine is A. at Refurbishment (Level 3) shop visit or B. the engine is at Overhaul (Level 4) shop visit or C. the HP Compressor is at piece part level and the life of the HP Compressor Stage 1 to 4 Rotor Discs or D. the HP Compressor Rotor Shafts is greater than or equal to 1000 Cycles Since New (CSN) carry out the actions defined in Section 3. Accomplishment Instructions of Rolls-Royce Non-Modification Service Bulletin (NMSB) No. 72-AF964, Revision 1 2. or if at the effective date of this Airworthiness Directive the engine is at A. at Refurbishment (Level 3) shop visit or B. the engine is at Overhaul (Level 4) shop visit or C. the HP Compressor is at piece part level and the life of the HP Compressor Stage 1 to 4 Rotor Discs or the HP Compressor Rotor Shafts is greater than or equal to 1000 Cycles Since New (CSN) carry out the actions defined in Section 3. Accomplishment Instructions of Rolls-Royce Non-Modification Service Bulletin (NMSB) No. 72-AF964, Revision 1. This is slightly misleading and might lead to misunderstanding at airlines. From LHT point of view the second proposal is seems to be mandated with PAD.	Peter Brudler Lufthansa Technik AG, Customer Engineering	17/02/2009	The compliance section of the Final AD has been modified in order to address these concerns regarding potential misinterpretation of the requirements.

General	Firstly I think there could be some confusion in the PAD re HP Compressor at piece part level, I believe this should be HPC Shaft or drum, even the NMSB is not precise here in referring to the HPC rotor which could be taken to be the bladed assembly. Secondly the NMSB says that TX shafts/drums need not be inspected, there is no reference to this in the PAD. Even the RR comment is a little confusing as very rarely are parts completely TX, it is normally that the part is rejected as the remaining life is inadequate to make it economic to re-install. We also have rejected on the g-T engine type drums that have been damaged at low life due to HPC rotor one failures which we would not expect to inspect. RR took on this point and would look to change the wording to scrapped. What is the EASA intent? I also questioned the use of the proforma, I have no problem with the operator or the shop giving feedback, but if the NMSB Form is effectively mandated then it means feedback must be given for all inspected drums. My position would be that the shop would inform RR and the operator of cracked component and feedback found be given according. I also had a question re the other NMSB referenced in the NMSB, 72-AF259 which I also under stand might be the subject of an AD. This inspection which does not require the drum to be reduced to piece part level and is capable of being performed whenever the 04 module is removed. I have also suggested to RR that the reference to this NMSB in this NMSB is removed since they are completely independent and the AF964 inspection would only be performed (as my understanding) when the drum is reduced to piece part level. Having written these comments I have one further part on whether this NMSB and AD is required at all. Would it not have been easier to change the Focus Inspection for this particular item in the relevant Engine Manual? On what is currently a one shop visit component certainly in our operation for the G-T and Trent 700 & 800, it is very unlikely that the component would ever be stripped down to piece part level. If per the NMSB, AD the inspection is only performed when the shaft/drum is down to piece part level, is not this exactly the same as the Focus Inspection requirement.	John Stanway Senior Technical Services Engineer Cathay Pacific Airways Engineering	02/03/2009	All references to the "HP Compressor at piece part level" have been changed to "HP Compressor Rotor at piece part level" in order to provide sufficient clarification. According to Annex Part 21 Commission Regulation No. 1702/2003 of 24 September 2003, Paragraph 21A.3B under (a), an AD mandates actions to be performed in order to restore an acceptable level of safety. Therefore, within the frame of this AD it is considered self-evident that parts being declared unserviceable for whatever reason do not need to be inspected. The wording of the compliance section of the Final AD has been modified in order to clarify that only the inspection part of the NMSB is mandatory. RR NMSB No. 72-AF259 is not the subject of this (P)AD. The investigation carried out on the subject addressed by this PAD/AD has concluded that AD action is necessary to correct this issue.
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