



COMMENT RESPONSE DOCUMENT
EASA PROPOSED AIRWORTHINESS DIRECTIVE (PAD) No. 09-043
CLOSED FOR COMMENTS ON: 20 March 2009

| PARAGRAPH OR SECTION COMMENTED | COMMENT / PROPOSAL | AUTHOR OF THE COMMENT | DATE OF COMMENT | PCM RESPONSE |
|--------------------------------|--|--|-----------------|---|
| General | <p>It is our understanding that the risk of deterioration of the APU exhaust is linked to two manufacturing discrepancies: outside protection ply made of silicone instead of glass cloth, and secondly one layer of insulation missing. From analysis of the reported in service cases, the overheating of the outside surface, that may lead to fumes and ultimately to inflammation, is expected to occur quite early in the service life of the exhaust protection (all incidents occurred within 10 hours of APU use from original installation).</p> <p>Inspection of the exhaust is not necessarily straightforward, as some F20 have received a modification creating a baggage compartment inside the rear bay. In this case, access to the APU is expected to require 4 man hours (total time opening to closure). While Dassault Aviation recognize that a prompt inspection is necessary to insure no deteriorated protection is in place, the requirement to repeat the inspection every 10 hours of APU usage is seen as overly stringent and an unnecessary disruption of our operators' activities.</p> <p>For APU with already long service without apparent deterioration, replacement is probably still necessary to remove the definition discrepancies, but may wait longer than 50 hours. Coordination with the normal maintenance schedule would be very beneficial. Note that average F20 APU use is about 1 hour per flight cycle (equivalent to 1 flight hour)</p> <p>Dassault Aviation would like to propose a modified schedule for the inspection and replacement actions required in the AD:</p> | <i>Pierre GEORGES Head of Regulations and Continued Airworthiness dept. Direction Technique Certification Dassault Aviation</i> | 27 March 2009 | <p>Not accepted.</p> <p>The inspection and replacement schedule is based on Microturbo's assessment of the safety risk, which is accepted by EASA. The inspection and replacement schedule is the same as that in Microturbo Alert Service Bulletin 49-11A76 Revision 1, dated 06 September 2007, and endorsed by EASA Safety Information Notice 2007-23, dated 12 September 2007. If and when Microturbo proposes a revision to the inspection and replacement schedule, EASA could consider a corresponding revision to the AD.</p> |

| | | | | |
|--|---|--|--|--|
| | <p>First inspection within 10 APU hours from the AD effective date. [Remove requirement for repetitive inspection]</p> <ul style="list-style-type: none"> - If the inspection shows deterioration, discontinue use of APU until insulation has been replaced. - If there is no observed defect: <ul style="list-style-type: none"> - If the APU exhaust has been installed less than 50 hours of APU use before the test, replace the part within 50 hours since the effective date of the AD - If the APU exhaust has been installed more than 50 hours of APU use before the test, replace the part on or before the next A check (7 months of 330 FH whichever comes first) [less stringent case for older installations] <p>The Microturbo SB would probably have to be modified in accordance to this new schedule. Moreover, it should of course be required from Microturbo to remove the affected P/N from sale, and supply only the new improved P/N.</p> | | | |
| | | | | |