



**COMMENT RESPONSE DOCUMENT**  
**EASA PROPOSED AIRWORTHINESS DIRECTIVE (PAD) No. 09-114**  
 CLOSED FOR COMMENTS ON: 26 October 2009.

PARAGRAPH OR SECTION COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
General	<p>RR issued the borescope inspection per SB 72-AF458 Rev 4 to <u>increase</u> the inspection of the front combustion to 1400 Flight cycles (Previously 500 flight cycles).</p> <p>SB 72-AF458 was issued mid 2007 and so far Cargolux has performed more than 160 inspections with no findings, this on engines ranging from CSN: 200 to 8800 cycles and CSO: 200 to 4000 cycles. We also have information from a different RB211-524 Operator, who has performed 680 inspections with no finding on engines with TSR 0 to 34000 hours and CSR 0 to 9900 cycles. All this information has been forwarded to RR. The combustion liner area is inspected during the engine borescope inspection every 6000 FH and it is also inspected every shop visit.</p> <p>Our comments/ enquiries are:</p> <ul style="list-style-type: none"> <li>- Were this "non-findings" properly reported to EASA?</li> <li>- With this amount of "non-findings", is the issuance of an AD not disproportionate, especially as the combustion liner, including the front combustion liner, is already inspected at 6000 Flight hours interval?</li> </ul>	<p><b>Paul Rasquin</b>            Powerplant Engineer            Cargolux Airlines International S.A.</p>	29/09/2009	<p>Noted.</p> <p>The actions mandated by the PAD are the result of thorough review of the engineering assessment carried out by the Type Certificate holder. This engineering assessment takes into account the applicable service experience including inspection findings.</p>
Compliance	<p>ACA would like to make the following comments on Proposed Airworthiness Directive no. 09-114:</p> <p>ACA believes that the "Required Action and Compliance Time" section could be simplified by setting the initial and repeat inspection requirements based on Time Since Last Inspection of the</p>	<p><b>Dan McKinley</b>            Air Canada Fleet Propulsion Engineer</p>	28/09/2009	<p>Noted.</p> <p>A reference to the time since last inspection instead of a more detailed definition of LIFE as included in the PAD would of course simplify the PAD. However,</p>

	<p>combustion liner, instead of defining the term LIFE. To ACA, it would be understood that a new or repaired combustion liner would meet the intent of an inspection. This would reduce the possibility of misinterpretation of the Airworthiness Directive.</p> <p>Secondly, ACA wonders why an Airworthiness Directive is required in this case, since the MDP mandates these inspections anyway?</p>			<p>the PAD aims to cover other in-service situations that may be equivalent in terms of airworthiness. This may be beneficial for some operators.</p> <p>The MPD (Maintenance Planning Document) is a document at aircraft level. However, the requirements posted in the PAD result from investigation carried out on engine level and therefore tracking via a PAD on the concerned engines is required.</p>
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