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| <b>EASA</b>                                                                       | <b>COMMENT RESPONSE DOCUMENT</b>                                                                                          |
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**Commenter 1 Air Transport Association– Mark Lopez - 27/10/2009**

**Comment # 1**

The detailed inspection instructions provided in Airbus Service Bulletin A330-57-3081 Revision 03 for configurations 03 through 06, via Figure 7 currently provide approval to 1/64" oversize. If the operator were to implement the recommended inspection threshold and interval times as prescribed in EASA PAD 09-115 and Airbus Service Bulletin A330-57-3081 Revision 03, it is their experience that a minimum of 1/64" over sizing of the fastener holes would be required due to hole defect condition from fastener removal or out-of-round condition.

The operator feels that after complying with the inspection of the fasteners approximately five (5) times, until the Service Bulleting modification (terminating action timeframe) is reached, a 5/64" oversize hole could occur, resulting in a potential short edge margin condition. Additionally, the excessive over sizing would require bushing installation and multiple Alternate Method of Compliance (AMOC) approvals. It is recommended that Airbus provide options to at least 2nd or 3rd oversize for Configurations 03 through 06.

**EASA response:**

At first inspection through ISB 57-3081/57-4089, fasteners installed with high interference fit in production are to be removed and therefore related holes will probably be damaged with scratches.

It is required that the holes are cleaned and smoothed for rototest inspection.

The SB flow chart provides an oversizing to nominal diameter or to R1 from nominal diameter if necessary.

Fasteners are re-installed in transition fit for next inspections in order to reduce the risk of damaging holes at subsequent fastener removal. Thus "hole oversize" (second, third, or subsequent oversizes) should not be needed very often (from repair database, from 2001 up to know, cases of damages in this hole are very rare). After a second oversize or next nominal, the fatigue life is then reduced. That is why, operators are asked to contact AIRBUS and a RAS will be issued if needed.

Installation of bushes is also not easy and needs specific instructions and RAS (complex for introduction into the SBs).

In general, the RAS cancels inspection requirement up to A/C mid life, then, operator should be able to perform the final fix (Modifications as per SBs A330-57-3090, A340-57-4098, A330-57-3098, or A340-57-4106).