


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 09-136 [Published on the 02 December 2009 and officially closed for comments on the 30 December 2009]

Commenter 1 : Qantas Airways Ltd – Ben Nicholls – 17/12/2009

Comment # 1

I have reviewed the subject Proposed AD and I would like to provide some feedback prior to release of AD.

The mandatory action of the AD is stated as being, "(a) On-wing - Carry out the actions specified in Table 1.a and 1.b of this AD..." In Table 1.B, repeat inspection intervals, please improve **the clarity of the boundaries between intervals**. For example, if the measured spline crest be determined to be exactly 1,0 mm, then it is not clear which compliance time to use; 50 cycles or 100 cycles. We would ordinarily take the more conservative option, however I believe the instruction should not be left to interpretation.

I believe that it would be clearer if the conditions were stated with wording similar to the following:

More than 0,5 mm but less than **or equal to** 1,0 mm

More than 1,0 mm but less than **or equal to** 1,5 mm

..... etc

EASA response:

We agree.

Table 1.b “On-wing Borescope Inspections – Further Action and Repetitive Inspection Intervals” is modified to improve the clarity of the boundaries between intervals, on the conservative side.

For instance “More than 0,5 mm and less than 1 mm” is replaced by “Equal to or more than 0,5 mm and less than 1 mm”

Commenter 2: Rolls-Royce plc – Stephen Bramfitt-Reid – 22/12/2009

Comment # 2

RRs only comment is that we may now have gathered further evidence that all the failure consequences stated in the Reason would not lead to an unsafe condition and the AD should be issued with this section revised accordingly.

EASA response:

We agree.

At the time of PAD issuance the safety analysis performed by Rolls-Royce was preliminary.

Since then we have reviewed the updated event tree analysis and the potential hazardous failure modes associated with the rearward movement of the IP turbine. The potential unsafe condition has therefore been updated in the final AD. However this does not change the necessity and the required action and compliance times of the AD.