


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 07-206 [Published on 13 November 2007 and officially closed for comments on 27 November 2007]

Commenter 1 : FedEx Engineering – Rolf Onjukka – 27/11/2007

Comment # 1

References:

PAD 07-206 dated 13 NOV 07

Airbus SB A300-57-6107 R0

Airbus Repair Drawing R57240221

Existing FAA AD 2007-02-09

PAD 07-206 compliance paragraph 4 says:

"If a crack is detected on a MLG rib 5 aft bearing forward lug per the ultrasonic inspection, perform a DVI before next flight.

Depending on the DVI result:

4.1. If no crack is visible, the aircraft can be operated up to the accomplishment of the Repair Drawing R57240221, provided that a repeat DVI is performed every 36 calendar hours with no crack detected."

Requested change:

4.1. If no crack is visible, the aircraft can be operated up to the accomplishment of the Repair Drawing R57240221, provided that a repeat DVI is performed every 24 flight cycles with no crack detected.

Substantiation for requested change:

36 hours / 1.5FH/FC = 24 FC

1.5FH/FC is utilization assumption for ALI requirements.

Crack propagation in Rib 5 MLG beam is a function of flight cycles – not calendar time. Flight cycles are better for tracking inspection intervals than calendar time. In case of high utilization as many as 30 flight cycles could be accomplished in a 36 calendar hour period.

Therefore, the proposed 24 flight cycle repeat interval would be more conservative than 36 calendar hours. If 36 calendar hours is the tracking interval it leads to redundant maintenance actions that do not add any value and cannot be tracked for compliance.

For example:

If the aircraft is parked, or in maintenance status, the repeat inspection has to be accomplished every 36 hours with no flight cycles in between

the way the PAD is written.

EASA response:

Partial agreement.

***The referred PAD 07-206 has been superseded by new PAD 10-002, in which the reference to 'calendar hours' has been withdrawn.
The new PAD 10-002 harmonises the time intervals for Detailed Visual Inspection by setting them at 100 FC.***