


EASA	COMMENT RESPONSE DOCUMENT
	<p align="center">EASA PAD No. 10-086 [Published on 13 August 2010 and officially closed for comments on 10 September 2010]</p>

Commenter 1 : Cathay Pacific Airways Ltd. – Martin Downey – 25 August 2010

Comment # 1

Cathay Pacific Airways operates a fleet of A340-300 aircraft affected by the Proposed AD (PAD) 10-086.

With respect to the PAD, it is our opinion that the PAD wording could be improved if a more clear description of the issue that resulted in the additional work.

I will refer to SB 28-4097 REV 01 in this example. I have attached the document excerpts for your reference.

Table 3 on page 45-46 did not refer to Figures 32 and 34 for kit C02R03, and did not highlight work at Rib 2-3 and Rib 18-19 (RH) - our fleet are affected by Kit C02R03 and not Kit C01R03.

Nevertheless the task worksteps (5)(b) and (5)(d) explicitly referred to Figures 32 and 34 respectively although not specified in Table 3.

In our AEO, table 3 was truncated to only include relevant information for our config (Kit C02R03) - refer to AEO-12261 REV 01 page 23-24.

I recovered the workcards (an example is attached) and it can be seen that each step related to Figure 32 and 34 have been all actioned individually indicating that despite the omission of the figure reference in table 3, the work was still performed in its entirety.

At SB REV 05, the workstep wording remains unchanged from SB REV 01 apart from the figure numbers. Figure 32 becomes Figure 46, Figure 33 becomes Figure 47, Figure 34 becomes Figure 58.

There is a minor change where the CML number for the sealant is changed from Mat No. 09-001 to 09-001B.

The PAD wording is as follows:

Required as indicated, unless already accomplished:

(1) Within 15 months after the effective date of this AD, for aeroplanes which have embodied Airbus SB A340-28-4097 at original issue or a later revision up to Revision 03 inclusive, check that the accomplishment of the electrical bonding for the water drain system (trim tank) and the ventilation intake system has been done in accordance with the instructions of Airbus SB A340-28-4097 Revision 05.

(1.1) In case the electrical bonding of the water drain system and the ventilation intake system was not performed in accordance with Airbus SB A340-28-4097 Revision 05, no later than 15 months after the effective date of this AD perform the additional work associated to the aeroplane configuration in accordance with the instructions of Airbus SB A340-28-4097 Revision 05.

(2) A review of the aeroplane maintenance records is acceptable in lieu of the check required by paragraph (1) of this AD provided that the accomplishment of the electrical bonding for the water drain system (trim tank) and the ventilation intake system can be conclusively identified as performed in accordance with Airbus SB A340-28-4097 Revision 05.

I think that the repeated reference to SB revision 05 is will create compliance difficulties due to the minor changes at REV 05, and the fact that if the work was done per Rev 01 it could defacto not be performed in accordance with the instructions of REV 05 as REV 05 came five years later.

I would propose to reword para 2 to state:

(PROPOSED WORDING START)

(2) For aircraft which have embodied Airbus SB A340-28-4097 at original issue or a later revision up to Revision 03 inclusive, a review of the aeroplane maintenance records is acceptable in lieu of the check required by paragraph (1) of this AD provided that the accomplishment each applicable work step of the electrical bonding for the water drain system (trim tank) and the ventilation intake system can be conclusively identified as performed in accordance with Airbus SB A340-28-4097 (Rev 00 to Rev 03 inc, as applicable) such that it can be positively confirmed that the work related the following figures was correctly accomplished:

Figure 30 and 32 (SB A340-28-4097 rev 00)

or

Figure 32 and 34 (SB A340-28-4097 rev 01)

Figure 32 and 34 (SB A340-28-4097 rev 02)

Figure 35 and 37 (SB A340-28-4097 rev 03)

(PROPOSED WORDING END)

It is my opinion that the PAD should clearly elaborate the nature of the potential misunderstanding in Table 3 of SB revisions up to and including SB A340-28-4097 rev 03, and elaborate the checks that may be performed on the maintenance records to confirm that the SB requirements have not been misunderstood.

Otherwise, there is the risk that many operators will have little option of than enter the trim tank to confirm the status of the installation. The access to the areas affected by the modification is quite notoriously difficult due to the fact that the trim tank is a carbon composite structure, and undue access may result maintenance error and sealing difficulties (fuel leaks).

I would be very happy to discuss further your AD specialists to discuss changes to the AD wording to make sure that we can correctly and reliably check the aircraft records to confirm that the work was done, and to minimise the attendant risk of undue maintenance on the aircraft.

EASA response:**1/ SB figure numbering:**

As stated, in the different SB A340-28-4097 revisions, the figures have changed.

As airworthiness directives also cover future potential revisions of SBs, the policy is not to state specific figures of an SB as those may evolve in future revisions and require an unwanted AD revision.

Therefore, it's up to operators to identify the correspondence between SB revision and affected figures for the additional work defined in SB A340-28-4097 Revision 05 to demonstrate, if applicable, to their local authority that accomplishment of the additional work is not necessary.

2/ CML change:

Airbus considers the use of CML 09-001 or 09-001b as equivalent.

3/ AD modification-clarification:

As mentioned above, we don't intend to specify any figure reference as they may evolve in future SB revisions.

Nonetheless, the AD wording has been modified in order to avoid possible confusion. The aim of the first requirement of the AD "Required action and Compliance time" is to check that the electrical bonding of the water drain system (Trim Tank) and the ventilation intake system, as currently defined in Airbus SB A340-28-4097 Revision 5, has been performed.

Commenter 2: Airbus Central Entity – Jorge Monzon – 10 September 2010**Comment # 2**

We have received from operators some comments regarding accomplishment instructions of this PAD 10-086 (to be closed for consultation today). As you know, the additional work mandated consists on doing (if confirmed not completed), for aeroplanes which have embodied Rev 3 or previous of the SB, the electrical bonding of the water drain system (Trim Tank) and the ventilation intake system.

Operators seem confused on the actual wording used:

“in accordance with the instructions of Airbus SB A340-28-4097 Revision 05.”

As this additional work impacts aeroplanes which have embodied Rev 3 or previous, then this electrical bonding should have been done in accordance with Rev 03 or previous, not Rev 05.

In order to avoid confusion, we propose then to delete the reference to Rev. 05 on paragraphs § (1), (1.1); and (2) as follows:

“(1) Within 15 months after the effective date of this AD, for aeroplanes which have embodied Airbus SB A340-28-4097 at original issue or a later revision up to Revision 03 inclusive, check that the accomplishment of the electrical bonding for the water drain system (trim tank) and the ventilation intake system has been done. in accordance with the instructions of Airbus SB A340-28-4097 Revision 05.

(1.1) In case the electrical bonding of the water drain system and the ventilation intake system was not performed in accordance with Airbus SB A340-28-4097 Revision 05, no later than 15 months, after the effective date of this AD perform the additional work associated to the aeroplane configuration in accordance with the instructions of Airbus SB A340-28-4097 Revision 05.

(2) A review of the aeroplane maintenance records is acceptable in lieu of the check required by paragraph (1) of this AD provided that the accomplishment of the electrical bonding for the water drain system (trim tank) and the ventilation intake system can be conclusively identified as performed. in accordance with Airbus SB A340-28-4097 Revision 05.”

You will also find attached the PAD with the proposed changes.

Let us know if you would agree to these changes.

EASA response:

We disagree as these paragraphs need to contain a reference defining what has to be checked.

Nonetheless, the AD wording has been modified in order to avoid possible confusion. The aim of the first requirement of the AD “Required action and Compliance time” is to check that the electrical bonding of the water drain system (Trim Tank) and the ventilation intake system, as currently defined in Airbus SB A340-28-4097 Revision 5, has been performed.