

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 11-047 [Published on the 04 May 2011 and officially closed for comments on the 01 June 2011]

Commenter 1: Lufthansa Technik AG – Thorsten Koch – 04/05/2011

Comment # 1

With reference to PAD 11-047 and PAD 11-048 and related SBs A320-53-1208 and A320-57-1153 we would like to know if Airbus and EASA can confirm that no non-conforming nuts ASNA2531-4 could have been used outside Airbus production.

This was the case with EASA AD 2011-0015, which now forces DLH to inspect all aircraft operated, as the release cable P/N L32A319-160-001 to be eliminated was procurable as a spare part and two-way interchangeable (per IPC) with required P/N L32A320-180. We want to avoid further such problems in advance.

EASA response:

Investigations performed by Airbus have confirmed that the non conforming nuts ASNA2531-4 have not been delivered for Airbus use outside Airbus production. Batches of suspect nuts were immediately removed from stocks in production and assembly lines. In addition, Review of kits that may have included suspect nuts has been performed in Airbus Spares Centre with nil findings.

Commenter 2: British Airways Engineering – Peter Riddick – 05/05/2011

Comment # 2

With ref to the 6 year compliance from first flight.

Airbus MPD tasks are based around 6 years or 72 months for their heavy check inputs and most tasks are aligned with this.

BAW have consent to carry out C checks at 20 month intervals and so our heavy check aligning with this task will fall at 80 months.

BAW have two aircraft applicable to this inspection and are currently planned to be actioned at their next 4C inputs due in April and July of 2014. In both cases these checks will fall outside of the 6 year from first flight by 2 months.

BAW would request that the mandated end date is set for a period of 80 months from first flight to better enable airlines such as and including BAW to accomplish these inspections on the most suitable heavy checks.

EASA response:
EASA disagrees.

Commenter 3: Air France – Didier Boulanger – 10/05/2011

Comment # 3

Could you consider the following point regarding subject PAD? Instead of "within 6 years after the aeroplane first flight" could you mention "within 6 years after the aeroplane first entry into service" (date of first operator flight).

EASA response:

EASA disagrees. The use of a reference date based on “the aeroplane first entry into service” could potentially cause confusion. Therefore the wording which is commonly used is “the aeroplane first flight”.

Commenter 4: Sabena Technics – Majdi Nouria – 12/05/2011

Comment # 4

[Can] the installation of an alternative part number of fasteners and nuts [be] considered as an AMOC?

EASA response:

Use of alternative part number of fasteners and nuts can be granted through an AMOC, if substantiated.

Commenter 5: US Airways – Richard Castle – 20/05/2011

Comment # 5

Please find US Airways comments related to subject EASA PAD's 11-047 and 11-048 below.

Two AD's are proposed regarding ASNA2531-4 nuts; structural nuts which were found cracked in production. Airbus Service Bulletins A320-53-1218 and A320-57-1153 are identified as mandated compliance documents.

US Airways have no affected aircraft. We agree with the proposed AD's, but would like to add these comments:

No recommendation is given regarding operators' spare parts, neither in the PADs nor in the bulletins. We recommend data be provided, including date of manufacture and batch numbers of suspect nuts. Operators can then determine whether we may have purchased some of the suspect hardware, and address our stock accordingly. If it has been determined that there is no safety risk from the spares pool, then that should be clearly stated in the ADs.

EASA response:

Investigations performed by Airbus have confirmed that the non conforming nuts ASNA2531-4 have not been delivered for Airbus use outside Airbus production. Batches of suspect nuts were immediately removed from stocks in production and assembly lines. In addition, Review of kits that may have included suspect nuts has been performed in Airbus Spares Centre with nil findings.