

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 11-048 [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: Air France – Didier Boulanger – 10/05/2011

Comment # 2

Could you consider the following point regarding subject PAD? Instead of "within 12 years after the aeroplane first flight" could you mention "within 12 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 3: US Airways – Richard Castle – 20/05/2011**Comment # 3**

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.

Commenter 4: British Airways – Adrian Hewes – 23/05/2011**Comment # 4**

A question from British Airways (BAW):

Airbus has stated that **oversize** part numbers should be written EN6115V4X* instead of EN6115V4X-* within the current latest Revision (01) of SB A320-57-1153.

BAW would therefore be unable to comply with the proposed AD with the SB A320-57-1153 at its current Revision as the fasteners listed in the SB are unobtainable in the X-* format.

EASA response:

EASA agrees. Airbus Service Bulletin A320-57-1153 will be revised to correct the bolt part number EN6115V4X- to EN6115V4X*. Pending this revision issuance, Operators could contact Airbus to get revised approved data.*