


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 11-104 [Published on the 04 October 11 and officially closed for comments on the 01 November 11]

Commenter 1: Airbus – Christel Ravier – 14.10.11
Comment # 1

As a member of Airbus LR continued airworthiness team, I am doing the follow-up of ATA72 AD under today ref PAD 11-104. Can you please confirm that appropriate revisions for Trent 500 SB RB211-72-AF260, respectively SB RB211-72-G448 are revision 4, respectively revision 1 as written in the paragraph "Required Action", although revisions 5, respectively 3 are mentioned in the paragraph "Ref. Publications"? Also, in the paragraph "Ref. Publications", it is stated that "The use of later approved revisions of these documents is acceptable for compliance with the requirements of this AD", what about former revisions? Indeed, what would be the status for operators that applied SB RB211-72-AF260 at revision 5 and not revision 4, would they be compliant to the AD?"

EASA response:

Comment accepted. For Trent 500 engines, we have updated the NMSB revisions in the Required Actions and Compliance Times paragraph. It is now in line with the Ref. Publications paragraph. For Trent 500 engines, after the effective date of the AD, inspections should be accomplished in accordance with the instructions of NMSB RB211-72-AF260 Revision 5 or NMSB RB211-72-G448 Revision 3, or any later approved revisions of these documents.

Commenter 2: Federal Aviation Administration (FAA) – Alan Strom – 11.10.11
Comment # 2

I am writing to comment on PAD 11-104, Engine - Intermediate Pressure Compressor Rotor Shaft and Balance Weights - Inspection/Modification (Trent 500, 700 and 800).

1) Reference the second-to-last paragraph of the Reason section: Has the current calculated risk associated with IPC balance weight fretting, and following the inspections required by EASA AD 2010-0266R1, increased since that AD was issued? To put it another way, did the risk analysis associated with 2010-0266R1 assume a future change to require installed eddy current inspections?

- 2) The definition of a qualifying shop visit is very well defined (making it easier for the FAA to issue our associated AD). We appreciate the efforts EASA is making in this regard.
- 3) In paragraph (4) of the Required Actions and Compliance times section, the PAD states that the engine must be modified either at the next [qualifying] shop visit, or within 96 months of the effective date of this AD. How was the time frame (96 months) requirement arrived at?
- 4) In paragraphs (2) and (7) of the Required Actions and Compliance times section, the PAD requires action "during each shop visit after 20 January 2011." The FAA can not legally mandate actions prior to the effective date of the AD. I would expect we will change those requirements to, "unless previously done, after the effective date of the AD,...."

EASA response:***Partially agreed.******Response to comment 1: Risk calculations were projected into the future and anticipated future additional action would be necessary.******Response to comment 2: No response required.******Response to comment 3: The time frame will coincide with that of the RR SBs which is derived following Part 21 GM 21A.3B Sufficiency of Corrective Action Guidelines.******Response to comment 4: The reference to the effective date of the previous AD has been deleted as, indeed, we only need to consider inspections to be accomplished after the effective of this new AD and we have updated as well the NSMB revision number with the latest available version.***