


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 12-022 [Published on 26 March 2012 and officially closed for comments on 23 April 2012]

Commenter 1: Lufthansa Technik AG – Thorsten Koch – 10/04/2012
Comment # 1

A/

[...] LHT think that some cases are not explicitly covered by SB 25A1555 and PAD 12-022. I'll give you some examples to explain it better:

Example 1:

An aircraft inspected acc. SB 25A1555 at 24,000 FC had crack findings <40mm on the front/aft sheet of the lower central support. SB 25A1555 Rev. 2 and EASA AD 2007-0276R1 require repair/modification within 4500 FC or 20 MTH.

At effective date of the forthcoming AD (PAD 12-022), the aircraft has accumulated 26,000 FC and the cracks are still <40mm. Aircraft still compliant with 2007-0276R1.

The forthcoming AD requires to “accomplish the applicable corrective actions” within “the compliance time(s) specified in Airbus SB A320-25A1555 Revision 03”. 25A1555 Rev. 03 allows a deferral of rectification only up to 500 FC only. There is no further explanation in SB 25A1555 Rev. 03 or PAD 12-022.

The new compliance limit could now be interpreted to be 24,500 FC, but the aircraft is already at 26,000 FC, so the aircraft would need to be grounded and repaired before next flight.

This is clearly not the intention. I think the appropriate solution would be to introduce a Grace Period of 500FC after effective date of the AD to cover this case. This could read like this (taken from PAD 12-022):

(2.2) Depending on findings during the inspection as required by paragraph (2.1) of this AD, and within the compliance time(s) specified in Airbus SB A320-25A1555 Revision 03 or within 500 FC after effective date of this AD, whichever occurs later, accomplish the applicable corrective actions in accordance with the instructions of Airbus SB A320-25A1555 Revision 03, or modify the aeroplane, in accordance with the instructions of Airbus SB A320-53-1215 and SB A320-25-1557.

or alternatively (which would be better, as it explains the case) add a new sub-paragraph:

(2.3) In case the aeroplane has been inspected in accordance with Airbus SB A320-25A1555 Revision 02 or earlier revision, and the corrective action of crack findings has been postponed in accordance with the compliance time(s) instructed by EASA AD 2007-0276R1 paragraph (2.3.2), within 500 FC after effective date of this AD accomplish the applicable corrective actions in accordance with the instructions of Airbus SB A320-25A1555 Revision 03, or modify the aeroplane, in accordance with the instructions of Airbus SB A320-53-1215 and SB A320-25-1557.

Example 2 (without going into details) would be the same for the lower lateral fittings.

The proposed change to the forthcoming AD would logically be:

(1.2) Depending on findings during the inspection as required by paragraph (1.1) of this AD, and within the compliance time(s) specified in Airbus SB A320-25A1555 Revision 03, as applicable, or within 500 FC after effective date of this AD, whichever occurs later, accomplish the applicable corrective actions in accordance with the instructions of Airbus SB A320-25A1555 Revision 03, or modify the aeroplane, in accordance with the instructions of Airbus SB A320-53-1215 and SB A320-25-1557.

and again it is proposed to add a new paragraph:

(2.3) In case the aeroplane has been inspected in accordance with Airbus SB A320-25A1555 Revision 02 or earlier revision, and the corrective action of findings has been postponed in accordance with the compliance time(s) instructed by EASA AD 2007-0276R1 paragraph (1.3), within 500 FC after effective date of this AD accomplish the applicable corrective actions in accordance with the instructions of Airbus SB A320-25A1555 Revision 03, or modify the aeroplane, in accordance with the instructions of Airbus SB A320-53-1215 and SB A320-25-1557.

B/

[...]SB A320-25-1557 Revision 02 is the first revision to deny the use of a lower central support of old design and to perform SB 53-1215 instead. This is in line with the instructions provided in Table 2 C. Therefore, [...] we propose to Amend the AD as follow:

- Amend:

(1) Special detailed inspection of the 80VU rack lower lateral fittings:

Aeroplanes fitted with the 80VU rack lower lateral fittings modified in accordance with the instructions of Airbus SB A320-25-1557 at original issue or any later approved Revision are not affected by the inspections required by paragraph (1) of this AD.

- Amend paragraphs (1.2), (2.2) as follows:
[...] *or modify the aeroplane, in accordance with the instructions of Airbus SB A320-53-1215 and SB A320-25-1557 Revision 02.*
- We think that para (4) can remain unchanged (i.e. any revision of 25-1557 with the later or simultaneous accomplishment of 53-1215 is acceptable).
- [...] To avoid inconsistencies with a later revision of SB 25A1555 (see Isabelle's reply) and SA ALI/MRBR PPH we propose to amend para (3) as follows:
(3) Concurrent with each special detailed inspection, as required by paragraphs (1) and (2) of this AD, as applicable, accomplish a special detailed (boroscope) inspection of the upper fittings and shelves of the 80VU rack, in accordance with the instructions of Airbus SB A320-25A1555 Revision 03. [...]

C/

[...]our other comments have already been addressed by Airbus and taken into account for the next revision of SB A320-25A1555

EASA response:

Comment understood. The PAD has been revised to specify the compliance time to perform the corrective actions associated to the last inspection of the 80VU rack lower lateral fittings in accordance with the instructions of Airbus SB A320-25A1555 at original issue or Revision 01 or Revision 02 as required by EASA AD 2007-0276R1, and to specify the Airbus SB A320-25-1557 Revision to be considered when necessary.

Commenter 2: CHINA EASTERN AIRLINES CO., LTD. – QIAN Limin – 18/04/2012**Comment # 2**

I am from the engineering section of China Eastern Airlines.

As PAD 12-022 and SB A320-25A1555 Revision 03 added new requirement to check the upper fittings and shelves of the 80VU rack, but SB 25-1557 had not included the retrofit for this part, for the PAD REQUIREMENT:

(3) Concurrent with each special detailed inspection, as required by paragraphs (1) and (2) of this AD, as applicable, accomplish a visual inspection of the upper fittings and shelves of the 80VU rack, in accordance with the instructions of Airbus SB A320-25A1555 Revision 03. If any discrepancy is found, before next flight, contact Airbus for approved corrective action instructions and accomplish those instructions accordingly.

If we choice to install SB 25-1557 before the inspection of SB A320-25A1555, instead of the first inspection, please advise how should we do to fulfill this item. As the PAD indicated, it looks like we can do this inspection at the next 20000FC after SB 25-1557 installation, but we think at this status, the interval with be double increased.

Sent later on the same day:

Since some of our aircraft have already installed SB 25-1557, but without SB 25-1555 and 53-1215, and no records for the status of all replaced parts on those aircraft, to avoid the missing of the defect on the upper fittings, we will also arrange the inspection on these parts before the date required as PAD 12-022 for all concerned airplanes.

EASA response:

Aeroplanes modified in accordance with the instructions of Airbus SB A320-25-1557 are not affected by the inspections required by paragraph (1) of this AD, but remains affected by the requirements of the paragraphs (2) and (3) of this AD, unless modified in accordance with the instructions of Airbus SB A320-53-1215. In this case, the inspection of the upper fittings and shelves of the 80VU rack must be done concurrently with the inspection of the 80VU rack lower central support as required by paragraph (2) of this AD.

No changes will be made to the Final AD in response to this comment.

Commenter 3: EasyJet Airline Company Ltd – Neil Finch – 18/04/2012**Comment # 3**

Please see EasyJet's comments below regarding the subject PAD:

easyJet find the reduced threshold for the inspection accompanied by a greatly reduced inspection interval unacceptable for our operation. We would be interested to see the justification for such a large reduction in these requirements.

easyJet are concerned that the repetitive intervals of the inspection of the Lower Lateral Fittings and the Lower Central Support are just 500 FC. The basis of the

MRBR/MPD maintenance intervals are that for the former “A” check interval; equivalent values are 750 FH, 750 FC or 4 months.

A repetitive inspection interval of 500 FC will unduly penalise operators who fly a flight hour versus flight cycle ratio of less than 1.5. For these operators the re-inspection interval will not align with the lowest interval check limit of 750 FH/750 FC (the basic A-Check). This will force operators such as ourselves to perform the inspection as part of line maintenance. We believe that this kind of inspection should be performed within a scheduled maintenance visit.

The manhours/downtime required to embody the terminating action SB’s makes this an unfeasible option for easyJet’s equalised check maintenance strategy.

EASA response:

EASA disagree. An extension of the compliance time has not been considered. The risk assessment for this issue which has been done considering all reported findings towards the fleet does not support a threshold / interval extension.

No changes will be made to the Final AD in response to this comment.

Commenter 4: Alitalia – Roberto Marchetti – 15/05/2012

Comment # 4

After 20.000 F/C it is very difficult to manage inspection every 500 F/C.

It means that we have to perform “**mandatory**” terminating action as per SB A320-25-1557 and A320-53-1215.

So I suggest giving an END EFFECTIVITY DATE to introduce SB A320-25-1557 and A320-53-1215 so NO ACTION performed in the future as Repetitive inspection.

EASA response:

EASA disagree. Modification of an aeroplane in accordance with Airbus SB A320-25-1557 and A320-53-1215 is an optional terminating action. As such, it can be performed at the operator discretion and at the most suitable opportunity.

No changes will be made to the Final AD in response to this comment.