


EASA	COMMENT RESPONSE DOCUMENT
	<p>EASA PAD No. 12-087</p> <p>[Published on 24 July 2012 and officially closed for comments on 21 August 2012]</p>

Commenter 1: British Airways – Charles Carson – 24/07/2012

Comment # 1

I am very surprised that this is a one off inspection, and not incorporated into the wider inspection/maintenance program.

EASA response:

This is not a one-off inspection. The repeat interval is currently being assessed and the ISB and AD will be revised accordingly, when this assessment is complete.

Commenter 2: BAE Systems (Operations) – Iain Deed – 25/07/2012

Comment # 2

BAE SYSTEMS (Operations) Limited have no comments on this PAD other than to point out a minor typographical error. Please see details below.
“(…) We’ve read it and have no comments other than there shouldn’t be a gap in “1 089 mm” – suggest “1089 mm”.

EASA response:

Agreed, AD will show 1089 mm.

Commenter 3: Sabena technics – Gerrit Pronk – 06/08/2012

Comment # 3

Sabena Technics – Brussels is performing engineering activities for TNT Airways / Panair operated Bae146-2/-3 Freighter aircraft.
On their behalf and before the closing of consultation period I would like to give some comments on PAD 12-087.

PAD N°12-087;

Applicability: BAe 146 and AVRO 146-RJ airplanes, all models, all serial numbers?

We have here an issue : all models for QT Cargo have the same compliance time as specified in table 1, but this is a disadvantage for QT Cargo airplane operations.

They reach typically around 900-1000 FC a year (for example for both TNT Airways and PANair fleet) : as stress cracks are more influenced by FC than FH, we do think that it is more reasonable to split the Compliance time table in two cases : one for Passenger airplanes and one for QT Cargo airplanes.

Furthermore, the built-up of a QT Cargo airplane is different from a Passenger airplane : QT Cargo models do have reinforcement doublers around the freight door, and do not have usually an aft pax / service doors*
=> The structure does so less suffer (Torsion) in that area than a Pax airplanes.

Proposal for inspection threshold;

Passenger airplanes / within 1000FC or 6 months wof after the effective date of AD.

QT Cargo airplanes / within 1000FC or 12 months wof after the effective date of AD. Or in some cases a "WAIVER" could be granted, for example for the TNT / PANair fleet for which C-check campaign is from December till September approx.

*Serial n° E2056 (PANair fleet) is the only one in the fleet who have installed Aft Pax / Service door. Inspection iaw ISB.53-239 was done during the C-check in July 2012 resulting in "NO FINDINGS".

EASA response (compiled by BAE Systems and agreed by EASA):

The cracking addressed by the ISB represents a significant risk to the structural integrity to the airframe. Consequently, a relatively severe compliance period has been defined for the initial inspection. While it is correct that the crack propagation mechanism is flight driven rather than calendar driven, the 6 months calendar backstop was introduced to ensure that all aircraft over 10,000 flights are inspected at the earliest opportunity. It should be noted that the

inspection will be revised to introduce a repeat inspection. This will be flight based only (i.e. no calendar backstop).

With regards to the structural configuration of QT/QC aircraft, the NDT procedure specified in ISB 53-239 was validated on an ex-TNT QC aircraft prior to issue, hence, the reinforcing does not affect this particular inspection. The crack propagation mechanism in this case is fuselage pressure acting in the "hoop" direction on the skin lands, hence, the rotational stiffness of the rear fuselage does not affect the inspection interval.

Commenter 4: Cityjet – Donal O'Shea – 07/08/2012

Comment # 4

Having reviewed EASA PAD No.12-087, we wish to express our concern of the impact this inspection will have on our line maintenance operation.

We have performed the ISB on one aircraft (with nil findings) while on C-Check, with access gained via the rear galley with the floor removed.

We believe the inspection will take considerably longer when accessing the inspection area via the aft cargo hold. Initial feedback from other operators (via BAE) has suggested it could take up to 1.5 days to complete.

In order to minimise ground time of operational aircraft, Cityjet propose to extend compliance time of the AD to 1 year from the AD 'Effective Date', with the aim to capture the inspection on Base maintenance inputs.

EASA response (compiled by BAE Systems and agreed by EASA):

Comments on compliance time as per Comment #3, above. BAE SYSTEMS are currently investigating if external eddy current inspection of the skin land is viable. If this is viable, the inspection requirements in ISB 53-239 will be revised accordingly, which will minimise the maintenance input duration.