


EASA	COMMENT RESPONSE DOCUMENT
	<p>EASA PAD No. 12-089</p> <p>[Published on 25 July 2012 and officially closed for comments on 22 August 2012]</p>

Commenter1: British Gliding Association – Jim Hammerton – 01/08/2012

Comment # 1

An AD for the initial inspection is welcomed however the BGA feel that an Airworthiness Directive for the 5 year re-inspection of the elevator control rod is not justified as it has now been incorporated in the instructions for continued airworthiness.

The BGA has been carrying out a similar inspection in the UK for nearly 10 years at 3 year intervals with no reports of problems ref BGA inspection 036/06/2003 <http://www.gliding.co.uk/bgainfo/technical/inspections/036-06-2003-issue-1.pdf>

In addition MSB 817-64 calls for a tubular rivet to be replaced when reassembling the rod after inspection. This tubular rivet requires special tools to properly form, easy in production but very difficult in the field. If improperly formed this rivet could create an unsafe condition. It would be far more practical and safer to replace the rivet with a suitable bolt and nut that can be installed with normal hand tools.

Comment # 2

Grob MSB 817-64/1

Whilst carrying out the inspection and completing the inhibiting measures using LPS3 as advised in the MSB it was found that the LPS3 caused the control rod upper quick disconnect to become very stiff by the wax content of the LPS3 hardening. It is feared that the quick disconnect could be used but fail to lock properly thus creating an unsafe condition.

Maintenance personnel should be made aware that any LPS3 or wax rust inhibitor must be cleaned from inside the quick disconnect device. Gentle heating with a hot air gun then application of light oil does it.

EASA response to # 1:

"Grob has already taken in consideration a design change with bolt/nut replacing tubular rivets, but anyway, due to several reasons, this solution has been rejected.

The experience shows that, if removal of rivets is appropriately performed, the rod can be re-riveted for at least 3 times without weakening the connection. On the other side the bolt-nut solution, even if more practical when removing and reinstalling, can be subjected to a faster wear due to possible play or incorrect fit or tightness of the bolts. Furthermore the tailwheel configuration of the aircraft may have negative influence to that type of connection due to landing impacts. Grob is aware that rivets replacement is more difficult to apply in the field. Anyway the inspection can be duly prepared being it scheduled with a 5 year interval. When special tools for tubular rivets are not available, the operator can replace the entire rod with a serviceable part and send the old one to Grob for overhaul. This is well indicated into the MSB817-64 ('note' at point 1.8.13)."

EASA response to # 2:

Actually the wax content of the inhibitor could eventually cause stiffening of the quick disconnect. Grob have prepared a revision of the MSB to provide a "caution" note in order to warn operators to avoid contaminating the quick disconnect with the inhibitor.