


EASA	COMMENT RESPONSE DOCUMENT
	<p>EASA PAD No. 12-111</p> <p>[Published on 21 August 2012 and officially closed for comments on 19 September 2012]</p>

Commenter 1: Fokker Services B.V. – Jan Pinson –Wed 12/09/2012 16:36

Comment # 1

Fokker Services has the following comment on this PAD:

Paragraph "Reason":

- Delete the 2nd subparagraph "Decreased DSCL ... and Tay 620-15/20 engines."
Motivation:
- it has no added value because it is explained in detail in the third and fourth subparagraph how the decreased DSCL affects the disc assemblies.
- furthermore the current text is incorrect, it should have stated that it may affect the disc assemblies installed in Tay 650/620 engines because it only has an effect if the disc assembly was formerly or is currently operated on Tay 650 engines on a Plan D flight mission.
- Change the 4th subparagraph into:
"To address the ...to reduce the DSCL from 20000 engine flight cycles (EFC) to 18700 EFC and to correct the consumed life of LPC rotor disc assemblies P/N JR31198A and P/N JR34563A which were previously or are currently operated on Tay 650-15 or Tay650-15/10 engines to plan D Flight Mission."
Motivation: the current wording does not correctly reflect the intend of the NMSB actions.

Paragraph "Required Action(s) and Compliance Time(s)":

- Requirement (1): As far as we know the 2 P/N 's mentioned are the only P/N's that can be installed on the engine. In that case the P/N identification requirement is unnecessary. Refer to the NMSB which does not instruct to identify the disc P/N.
- Requirement (2): This requirement instructs to correct the consumed life before "before further flight" even if requirement (1) was performed well within 30 days. This is not the intent of the NMSB, which instructs to perform the correction of the consumed life

within 30 days. "Before further flight" is an inappropriate short compliance time for this requirement..

- Requirement (3) instructs to replace the disc assembly before or upon reaching 18700 FC. The NMSB does contain the same instruction, probably because all life limits are included in the Time Limits Manual and that document is part of the Tay TCDS.

Based on the information available to us, the (P)AD should require, within 30 days after the effective date of the AD, to:

- identify discs p/n JR31198A and JR34563A that were previously or are currently operated in Tay 650-15 or Tay 650-15/10 engines to Plan D Flight Mission.
- correct the consumed lives for those discs
- adhere to the new DSCL for those discs e.g. by amending the AMP

EASA response:

Paragraph "Reason": EASA agrees with the wording "improvement" proposal. We have amended the PAD.

Paragraph "Required Action(s) and Compliance Time(s):

To requirement (1): EASA disagrees. It might be true today, but not for the future.

To requirement (2): EASA disagrees: After result of identification (max.30 days) it is necessary to calculate/correct the life " before next flight".

To requirement (3): EASA disagrees. (2) is to correct the paperwork and (3) is to replace hardware before reaching the new limit.