


<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<p align="center"><b>EASA PAD No. 12-135</b>  <b>[Published on 5 November 2012 and officially closed for comments on 3 December 2013]</b></p>

**Commenter 1: Emirates Airlines – Khalid Al Humaidan – 19/11/2012**

**Comment # 1**

It is understood that the repeat interval of inspection as per Airbus SB 380-35-8019 will be mandated at 5,000 FH's. This requirement is outlined in following paragraph quoted from the PAD:

(2) Thereafter, at intervals not to exceed 5 000 FH from the last leak check accomplished in accordance with SB A380-35-8019 or from the last validation leak check required by paragraph (4) of this AD, as applicable, accomplish a SDI of the oxygen DPL and container manifolds in accordance with the instructions of Airbus SB A380-35-8019.

Will it be possible if the interval of the repetitive inspection as per Airbus SB A380-35-8019 is escalated to 7,000 FH's instead of the proposed interval of 5,000 FH's?

The reason behind this request is that the repetitive inspection as per SB A380-35-8019 can be clubbed with Emirates A380 Aircraft C Check Schedule which is done every 2 Years or 12,000 FH's as per the A380 Maintenance Planning Document. In our case, we carry out the C Check every 2 years since it occurs before aircraft accumulating 12,000 FH's due to the utilisation nature of our A380 Aircraft.

As your respective department are well aware, performing the SDI of the oxygen DPL and container manifolds in accordance with the instructions of Airbus SB A380-35-8019 and carrying out required corrective actions in case leak rate is not within the limits in accordance with Airbus SB A380-35-8019 requires enormous Man Hours in order to isolate the leak source and replace the defective oxygen container and/or repair the system. Hence, accomplishing Airbus SB A380-35-8019 and carrying out corrective actions as deemed necessary during a C Check input will definitely ease compliance of subject Airworthiness Directive.

Kindly review the technical and regulatory feasibility of this request and please do not hesitate to contact us in case further information is required.

**EASA response:**

***Comment understood, but the risk assessment for this issue which has been done considering all reported findings towards the fleet does not support a threshold / interval extension for the time being. Please note that the reporting as requested by the final AD will afford Airbus to review the inspection programme. No changes have been made to the Final AD in response to this comment.***

**Commenter 2: Qantas Airways – Stuart Roach – 02/12/2012****Comment # 2**

Para (1) of the PAD requires inspection within 5000 FH since new or within 1000 FH after effective date of the AD, whichever occurs later. Inspection involves a leak check of the distribution pressure line in accordance with AMM task 35-22-00-790-801. If the leak rate is within AMM tolerance, then no rectification action is required and the leak check must be carried out again within 5000 FH. Similarly, if the leak check is not within AMM tolerance and rectification action is required, a validation leak check is carried out in accordance with AMM task 35-22-00-790-801 after the rectification action and then the leak check must be repeated within 5000 FH as per Para (2) of the PAD. Qantas currently carries out this AMM leak check every 24 months, therefore Qantas considers that credit should be given for aircraft having already completed a successful leak check. As such, Qantas believes the inspection per Para (1) of this PAD should be within 5000 FH since new, or within 1000 FH after the effective date of the AD, or within 5000 FH since the last known successful leak check in accordance with AMM task 35-22-00-790-801, whichever occurs later. Could EASA please include this compliance limit within the AD ?

Para (5) of the PAD refers to Para 1.E.(2) of SB A380-35-8019 for compliance times for rectification action. Para 1.E.(2) of SB A380-35-8019 appears to be in error. It states that if the leak rate is not within tolerance, then the oxygen cylinder needs to be refilled in accordance with AMM task 35-21-00-614-801. This is not required as the leak check per AMM task 35-22-00-790-801 pressurises the distribution line using an external source connected at the low pressure port and does not use oxygen from the oxygen cylinders. Furthermore, Para 1.E.(2) of SB A380-35-8019 indicates that the test is not required to be carried out for longer than 120sec, however the table indicates that rectification is required within 1000 FH if the low pressure limit (2 bar) is reached between 73 and 147 sec or within 2000 FH if the low pressure limit is reached after 147 sec. As such, the test should be carried out for at least 147 sec to be able to achieve the full allowance of the SB compliance limits. Could EASA and/or Airbus please comment on these discrepancies and advise if/when the SB will be revised ?

I would appreciate EASA/Airbus's consideration of the above comments prior to release of the AD. I would also appreciate any feedback from EASA/Airbus.

**EASA response:**

- 1) ***EASA partially agreed. A paragraph has been added to take credit of the successful leak check done before the effective date of this AD in accordance with the instructions of the AMM task 35-22-00-790-801. The Final AD has also been amended to clarify that the rectification action time after a finding must not be taken into account to determine the next inspection timescale.***
- 2) ***The safety / reliability calculations leading to grace periods and compliance times require that the dispatch pressure has to be at least 1,600 psig at all times to ensure a proper oxygen supply time in case of decompression and leakages in some of the containers at the same time.***  
***The diagram and the associated table (Compliance Time) are correct. The pressure in the system should be recorded for a minimum of 150 seconds, after which the obtained results (system pressure versus time) can be plotted, and the compliance time determined using the diagram and the associated table. In most cases when 120 second are reached – and probably already at 60 seconds – it will be clear to the testing personnel in which area of the diagram the aircraft has to be placed. That is the reason why the sentence “Even the diagram shows values above 120sec, there is no need to do the test longer than 120 sec” was written. This will be clarified at the next SB revision opportunity.***