

COMMENT RESPONSE DOCUMENT

EASA PAD No. 23-047-CN

[Published on 17 April 2023 and officially closed for comments on 15 May 2023]

Commenter 1: British Airways – Oliver Angell – 17/04/2023

Comment # 1

BAW would like to query the justification and merit behind cancellation of the subject AD.

Whilst the PAD states that all affected parts are “no longer available for (re)installation”, the EASA AD 2012-0260R1 continues to act as a backstop to prevent releasing engines back into service with an affected part installed. This also triggers a number of compliance reviews both at part receipt and engine certification to ensure engines remain compliant throughout their operating life.

Further to this, by having an active AD open against the affected part, this may also influence future re-designs of the Fuel Oil Heat Exchanger and highlight the safety implications of having seal material release in service.

BAW would like EASA to consider whether there is sufficient justification retain existing ruling AD 2012-0260R1 as published for the remaining service life of the Trent 900 engine as an additional safety layer outside of the immediate action and part recalls.

EASA response:

Comment not agreed. The PAD-CN clearly states that “all affected engines have been modified to install a serviceable part”, therefore the scenario of the commenter of “releasing engines back into service with an affected part installed” cannot, in fact, occur. The fact (also stated in the PAD) that no spare ‘affected parts’ are available anymore for (re)installation, it is no longer necessary to have an AD “to ensure engines remain compliant throughout their operating life”. Rolls-Royce is fully aware of the safety implications and has already designed a new FOHE. Based on these considerations, no AD is necessary anymore “as an additional safety layer” or for any other reason.

No changes have been made to the Final AD-CN in response to this comment.

