

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 12-145R1 [Published on 19 November 2012 as PAD 12-145, republished on 08 March 2013 as PAD 12-145R1, officially closed for comments on 22 March 2013]

Commenter 1: Qantas Airways Ltd – Stuart Roach – Fri 22/03/2013 14:09

Comment # 1

Dear Sir / Madam,

Please find the following comments from Qantas Airways for PAD 12-145R1:

Qantas appreciates the revision of the PAD to include an option to use maintenance records for determination of affected accumulators and also to include the terminating action, however Qantas has identified a few issues with the latest revision:

1. Requirement (1) states that identification and replacement of the accumulators need to be carried out in accordance with the instructions in Airbus SB A380-29-8018. This SB contains a requirement to complete and send a reporting sheet to Airbus after every accumulator replacement. For operators to be able to demonstrate strict compliance with this AD, this means we have to send this reporting sheet with every accumulator replacement. This reporting requirement would be extremely difficult to manage and would pose a large administrative burden which Qantas believes is unnecessary and adds no benefit to the requirements of this AD. As such, Qantas would like to request that the AD is revised to state that accumulators should be replaced in accordance with the vendor SB 299000-29A01 (which contains no reporting requirements) instead of Airbus SB A380-29-8018. Alternatively, if EASA feels that the Airbus SB must be used, then Qantas would like to request that the AD add a statement indicating that the reporting sheets do not need to be forwarded to Airbus.
2. In Table 1, the description for Configuration B accumulators states that they have “....a pink dot of paint on the identification label which confirms modification in accordance with EATON SB 299000-29A01.....”. It should be noted that SB 299000-29A01 does not carry out any modification but simply carries out HASS testing with Acoustic Emission. As such, the description should use the following wording instead of the above wording “....a pink dot of paint on the identification label which confirms the part has been tested in accordance with EATON SB 299000-29A01.....”.
3. The same logic applies for the compliance time for Configuration B accumulators which should state “Within 3525 FC or 29350 FH accumulated by the part since it has been tested in accordance with EATON SB 299000-29A01”.
4. Requirement (2) of the PAD uses an abbreviated SB number (SB 29-8016) to identify the terminating SB rather than the actual full SB number (SB A380-29-8016). Qantas believes the actual full SB number should be used instead of the abbreviated SB number.
5. Requirement (3) is unclear to Qantas. Qantas believes this requirement would be much clearer if it is rewritten as “From the effective date of this AD, if a HP

accumulator P/N 299000-1 with a S/N as listed in Appendix 1 of this AD is installed on an aeroplane, ensure the accumulator is subsequently replaced within the compliance time specified in Table 1 of this AD.”

Qantas would appreciate if EASA could consider the above comments in relation to this PAD. Please also contact me to provide any feedback or if you would like to discuss the above proposal (and/or Qantas's concerns) in further detail.

EASA response:

- 1. Comment understood. After review with TC holder the reporting is preferable but not formally required by specific paragraph of the RATC section of the final AD. The rationale behind is that the reporting will be limited on time. Indeed after having performed SB 29-8016 (non life-limited accu), the reporting is no longer required. In addition the reporting is a source of information to have a complete overview of the affected population (affected MSN vs affected accu).**
- 2. EASA agree. Final AD has been amended accordingly.**
- 3. EASA agree. Final AD has been amended accordingly.**
- 4. EASA agree. Final AD has been amended accordingly.**
- 5. EASA disagree. The paragraph (3) prohibits installation, from the effective date of the AD, of HP accumulators having P/N 299000-1 and serial number (S/N) listed in Appendix 1 of the AD unless they have accumulated time in service less than values indicated in Table 1 of the AD. As per the EASA AD writing rules, this is expressed by the standard wording ‘unless in compliance of this AD’. No change has been made to the Final AD in response to this comment.**