


EASA	COMMENT RESPONSE DOCUMENT
	<p>EASA PAD No. 13-017</p> <p>[Published on 21 January 2013 and officially closed for comments on 18 February 2013]</p>

Commenter 1: Boeing – D.A. Biggs – 11.02.2013

Comment # 1

Boeing has reviewed the subject NPRM and concurs with the contents of the proposed rule.
Therefore, no additional comments will be forthcoming.

EASA response:

Comment noted.

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

Commenter 2: American Airlines – John Beavers – 11.02.2013

Comment # 2

References:

1. PAD No. 13-017
2. EASA AD 2009-0073R1
3. Rolls-Royce Alert Service Bulletin (ASB) RB.211-72-AF964, Rev.3

EASA PAD, Reference 1, is issued for comment and will supersede EASA AD 2009-0073 R1, Reference 2. The proposed supersedure was prompted by Rolls-Royce release of Alert SB RB.211-72-AF964 Revision 3, Reference 3. The primary cause for the release of Reference 3 is to identify additional part numbers introduced by SB's 72-G612, 72-G613, and 72-G614 that also require inspection. No technical changes have been made regarding the actual inspection/procedure.

AAL has reviewed Reference 1 and is agreement with the content with the exception of new language appearing in item (4) under 'Required Action(s) and Compliance Time(s)'.

Item (4) states: 'From the effective date of this AD, installation on an aeroplane of an engine that contains an affected part (HPC rotor disc/shaft with a P/N as listed in Section 1.A of RR NMSB RB.211-72-AF964 Revision 3) is allowed, provided that, after installation, that engine is inspected and, depending on findings, corrected, as

required by this AD.'

The inspection required by Reference 3 can only be carried out at piece part level in an engine shop environment. For this reason, AAL suggest that the requirements of Item (4) be removed from Reference 1.

EASA response:

EASA partially agrees. The commenter misunderstands the requirements of paragraph (4).

Paragraph (1) applies only to engines that (on the effective date of the AD) have “an HPC rotor disc/shaft installed with a P/N as listed in Section 1.A of RR NMSB RB.211-72-AF964 Revision 3”. For engines that do not, on the effective date of the AD, have such a part installed, no inspection or corrective action is required by that paragraph.

However, the AD does apply to those engines. Paragraph (4) ensures that, when (at any time in future) an engine gets an ‘affected’ part installed and is then fitted to an aeroplane, the repetitive inspections and corrective actions ‘as required by this AD’ (i.e. as required by paragraphs (1) and (2) of the AD, at each qualifying shop visit) are subsequently accomplished on that engine. The statement ‘after installation’ in paragraph (4) is not a compliance time for (on-wing) inspection.

In response to this comment, paragraph (4) of the Final AD has been amended to clarify that “From the effective date of this AD, installation on an aeroplane of an engine that contains an affected part (HPC rotor disc/shaft with a P/N as listed in Section 1.A of RR NMSB RB.211-72-AF964 Revision 3) is allowed, provided that, after installation, that engine is inspected and, depending on findings, corrected, as required by paragraphs (1) and (2) of this AD”.