

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 13-023 [Published on 29 January 2013 and officially closed for comments on 26 February 2013]

Commenter 1: Lufthansa Technik AG – Dipl. Ing. Henning Jochmann – 29/01/2013

Comment # 1

After examination of the EASA PAD No.: 13-023 Lufthansa has to indicate that the actual procedure given in the dedicated PAD is not practicable.

Background acc. PAD 13-023:

Three cases of inboard Low Pressure Shut Off Valve (LPSOV) drive shaft disconnection have been reported on the A340-500/600. The result of the investigations showed that there was friction between the washer and the spirolox retaining ring, which then led to the spirolox retaining ring going out of its location groove. The outboard engine LPSOV are also affected due to the common design features.

This condition, if not detected and corrected, could lead to an LPSOV failure in open position, which would prevent the flight crew from shutting down the fuel flow in case of engine fire, possibly affecting the safety of the aeroplane.

To address this condition, Airbus developed 2 modifications (MOD 202850 and MOD 53091), which consists in installing an improved LPSOV stepped washer, to be embodied in service with Airbus Service Bulletin (SB) A340-28-5059

Lufthansa operates a fleet of 24 A340-600 aircrafts and needs to modify

Config 1 (10 aircrafts are affected) – 20 LPSOV outboard FRH120197M and 20 LPSOV inboard FRH120199M)

Config 2 (14 aircrafts are affected) – 28 LPSOV inboard FRH120199M

In sum 48 inboard valves and 20 outboard valves are affected by this modification.

Operators have two options to satisfy the modification requirements of the Service Bulletin A340-28-5059

- 1) Modify the LP fuel valves on bench
- 2) Return the LP fuel valves to EATON AEROSPACE for modification

For Lufthansa the modification can only be performed by choosing option number 2. The modification “on bench” is not possible due to missing qualifications, thus no option.

After consultation with the vendor EATON, Lufthansa was informed that the vendor needs 15 days to modify the valves. Further EATON informed Lufthansa, that there are no FOC rotatables for this modification.

Due to technological and planning factors this modification can only be performed during a C-Check event. The time, which the vendor needs for the modification of the valves, does not match with the duration of the C-Check (7 days). Therefore Lufthansa needs modified valves before starting the maintenance activity.

The modification must be performed before January 2017. To fulfill these requirements Lufthansa has to coordinate the Check intervals nose to tail. In this case Lufthansa needs a minimum of 16 modified valves (inboard and outboard) to ensure a safe and economically check performance and to prevent a longer layover phase. Only with the help of these modified valves Lufthansa is able to implement a safe close loop procedure with the vendor based on the not modified removed valves.

Based on these facts Lufthansa highly recommends a retrofit campaign with Free Of Charge modified rotatable valves provided by the vendor. This modification is a mandatory one and a possible AD. We have to replace the dedicated valves in a time frame of 4 years. Under the circumstances mentioned above this is not possible for Lufthansa.

EASA response:

EASA acknowledge this comment. EASA also consider that it is addressed to Airbus, and it is understood that Airbus and Lufthansa are now in contact on this subject.

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