


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 13-084 [Published on 19 June 2013 and officially closed for comments on 17 July 2013]

Commenter 1: American Airlines – LeAnn McNally – 02/07/2013

Comment # 1

Reference 1: PAD 13-084

Reference 2: Rolls-Royce Alert Service Bulletin RB.211-72-AG644, initial issue

EASA PAD, Reference 1, is issued for comment and was prompted by Rolls-Royce release of Reference 2, dated April 30, 2013. AAL has reviewed Reference 1 and is [in] agreement with the content, with the exception of paragraph (1) under "Required Action(s) and Compliance Time(s)". At shop visit, disassembly and work on the LP turbine module offers ample opportunity for components to be moved/swapped from one module to another. The possibility exists that S/N's may have moved. With this in mind, AA suggests that TBH S/N is confirmed before requiring replacement. See the following suggested italicized, bolded verbiage to be added to paragraph (1):

'For engines which have an LP turbine module (Module 08) installed, having one of the following Serial Numbers: FM0015, FM0032, FM0104, FMOI14, FM9773, FM9922, FM9925, FM9950, FM9951: At the next engine shop visit (for Serviceability, Check and Repair, Refurbishment or Overhaul), but not later than 30 June 2017, whichever occurs first after the effective date of this AD, ***confirm that the effective TBH S/N per Rolls-Royce Non-Modification Service Bulletin (NMSB) RB.211-72-AG644, Figure 7, is installed. If confirmed,*** replace the TBH with a serviceable part in accordance with the instructions of Rolls-Royce NMSB RB.211-72-AG644. ***If effective TBH SIN is not identified, proceed to (2)'***

Confirmation of the effective TBH SIN is consistent with Rolls-Royce NMSB RB.211-72-AG644, 3.A.(2) instructions. Without some provisional statement, the TBH must be replaced with a 72-G604 worked part regardless of the TBH SIN.

EASA response:

Comment accepted.

Paragraph (1) of the PAD as originally published made reference to engines which have a certain Module 08 installed, and then listed the S/N of those Modules, not the S/N of the engines listed in Fig.7 of the Rolls-Royce SB.

Nevertheless, the commenter has highlighted that there is room for interpretation and confusion. To remove any ambiguity, the requirement of § (1) is re-phrased as follows: "At the next engine shop visit (for Serviceability, Check and Repair, Refurbishment or Overhaul), but not later than 30 June 2017, whichever occurs first after the effective date of this AD, ***identify the Part Number (P/N) and serial number (s/n) of the TBH installed on the engine and, if the P/N and s/n of TBH are as listed in Appendix 1 of this AD, before release to service of the engine,*** replace the TBH with a serviceable part in accordance with the instructions of Rolls-Royce NMSB RB.211-72-AG644"

The PAD has been revised accordingly, also adding the Appendix with P/N and s/n of the TBH affected by the requirements of paragraph (1), and is re-published to allow for additional consultation.

Commenter 2: The Boeing Company – D. A. Biggs – 16/07/2013

Comment # 2

Boeing has reviewed the subject [EASA PAD 13-084] and concurs with the contents of the proposed rule. Therefore, no additional comments will be forthcoming.

EASA response:

Comment noted.