


EASA	COMMENT RESPONSE DOCUMENT
	<p style="text-align: center;">EASA PAD No. 13-096 [Published on 04 July 2013 and officially closed for comments on 25 July 2013]</p>

Commenter 1: Airbus – Lydie Bedolis – 09/07/2013

Comment # 1

- 1) Paragraph (13) should not limit the list to paragraph (3), (4) and (5) but (3) to (11) as there is no fix.
- 2) In addition a paragraph should be added for condition in case the affected part is reinstalled on wing.
- 3) In paragraph (11), reference to section 3.C in not in line with Appendix 1 table1 & 2.

EASA response:

1): EASA disagrees. It is correct that there is currently no terminating action for the repetitive inspection requirements. However paragraph (13) of the PAD (now paragraph (12) in the Final AD) refers to corrective actions defined in paragraphs (3), (4) and (5) of the PAD, following inspections required by paragraphs (1) or (2) of the PAD. Paragraphs (6) to (11) of the PAD are credit allowances for inspections performed in accordance with instructions other than those specified in paragraphs (1) or (2) of the AD. There is no need to include them in the statement of paragraph (13) of the PAD (now paragraph (12)) in the Final AD. No changes have been made to the Final AD in response to this comment. However it needs to be noted that credit allowances of paragraphs (6) to (9) of the PAD have been moved to Table 1 and Table 2 of Appendix 1 of the Final AD as “Acceptable Alternative Rolls-Royce NMSB and Section” for improved clarity.

2): EASA disagrees. In case a part is reinstalled on wing, inspections and corrective actions need to be continued in accordance with the required actions and compliance times of the AD, and no additional requirements are deemed necessary. No changes have been made to the Final AD in response to this comment.

3): EASA agrees. Section 3C does not exist in Rolls-Royce Alert NMSB RB.211-72-AH154. Reference to Section 3C has been removed from the relevant paragraph (now paragraph (10) in the Final AD).

Commenter 2: Lufthansa Technik AG – Danielle Gemsa – 22/07/2013

Comment # 2

PAD 13-096:

1) In paragraph (10) the following sentence is given:

“Inspections and corrective actions, accomplished before the effective date of this AD, in accordance with the instructions of Rolls-Royce Technical Variance (TV) TV124801 or TV124851 (at any issue) are acceptable in lieu of actions in accordance with the instructions of section 3.A or 3.B, as applicable, of Rolls-Royce Alert NMSB RB.211-72-AG971”.

Proposal: “Inspections and corrective actions, accomplished before the effective date of this AD, in accordance with the instructions of Rolls-Royce Technical Variance (TV) TV124801 or TV124851 (at any issue) or RR SBE RB211-72-AG971 (any issue) are acceptable in lieu of actions in accordance with the instructions of section 3.A or 3.B, as applicable, of Rolls-Royce Alert NMSB RB.211-72-AG971”.

2) In paragraph (11) the following sentence is given:

“Inspections and corrective actions, accomplished before the effective date of this AD, in accordance with the instructions of Rolls-Royce TV132043 or TV132217 (at any issue) are acceptable in lieu of actions in accordance with the instructions of section 3.A, 3.B or 3.C, as applicable, of Rolls-Royce Alert NMSB RB.211-72-AH154”.

Proposal: “Inspections and corrective actions, accomplished before the effective date of this AD, in accordance with the instructions of Rolls-Royce TV132043 or TV132217 (at any issue) or RR SBE RB211-72-AH154 (any issue) are acceptable in lieu of actions in accordance with the instructions of section 3.A, 3.B or 3.C, as applicable, of Rolls-Royce Alert NMSB RB.211-72-AH154”.

3) In Appendix 1 Table 2 the following sentences are given:

“Mount Lug Forging LE Areas – When TBH has accumulated no more than 900 EFC since new (see Note 2) on the effective date of this AD”

“Mount Lug Forging LE Areas – When TBH has accumulated more than 900 EFC since new (see Note 2) on the effective date of this AD”

Proposal:

“Mount Lug Forging LE Areas and Fail Safe Catcher – When TBH has accumulated no more than 900 EFC since new (see Note 2) on the effective date of this AD”

“Mount Lug Forging LE Areas and Fail Safe Catcher – When TBH has accumulated more than 900 EFC since new (see Note 2) on the effective date of this AD”

4) SBE 72-AH154 paragraph 1D(1) contains the following sentence: “Any TBH that received a full FPI in accordance with NMSB 72-AG971, 3.C.Accomplishment Instructions are deemed as compliant with this NMSB (72-AH154).”

Proposal: Please add this relation to the EAD to ensure consistency between EAD and SBE.

SBE 72-AH154:

1. In paragraph 1D(1) the following sentence is given: “For engines approaching or above the 1000 flight cycle limit at issue of this NMSB (72-AH154) the following compliance strategy must be adhered to...”

Comment: Please give a clear definition of “approaching”

2. In paragraph 3A(4b)(ii) the following sentence is given: “(ii) More than 15,00 mm in width and 2,60 mm in depth. REJECT.”

Proposal: “(ii) More than 15,00 mm in width or 2,60 mm in depth. REJECT.”

3. SBE 72-AH154 refers to Engine Life instead of TBH Life

Example: paragraph 1D(1): For Engines above 900 flight cycles: Inspect within 100 flight cycles”

Comment: Please refer to the TBH Life instead of Engine Life in the entire document to ensure module swaps are covered.

EASA response:

- 1) EASA partially agrees. As stated in section Reason of the Final AD, Rolls-Royce Alert NMSB RB.211-72-AG971 has been updated to Revision 1. A new paragraph (7) is inserted in the Final AD to provide credit for inspections performed in accordance with Rolls-Royce Alert NMSB RB.211-72-AG971 and Alert NMSB RB.211-72-AH154 at Initial Issues. Later approved revisions of Rolls-Royce NMSBs are addressed in the section Ref. Publications of the AD.**
- 2) EASA partially agrees. See response to question 1).**
- 3) EASA agrees. The reference to the Fail Safe Catcher was inadvertently omitted in Appendix 1 Table 2 'In-shop Inspections' of the PAD. This has been corrected in the Final AD.**
- 4) EASA disagrees. Paragraph (6) of the PAD provides credit for in-shop full FPI inspections performed in accordance with section 3.C of Rolls-Royce Alert NMSB RB.211-72-AG971 in lieu of on-wing inspections performed in accordance with Rolls-Royce Alert NMSB RB.211-72-AH154. No changes have been made to the Final AD in response to this comment. However it needs to be noted that credit allowances of paragraphs (6) to (9) of the PAD have been moved to Table 1 and Table 2 of Appendix 1 of the Final AD as "Acceptable Alternative Rolls-Royce NMSB and Section" for improved clarity.**

The comments on Rolls-Royce NMSB 72-AH154 are not taken into consideration in this CRD, as these should be addressed to Rolls-Royce.