

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 13-170 [Published on 19 November 2013 and officially closed for comments on 17 December 2013]

Commenter 1: Singapore Airlines – Jimmy Aw – 16.12.2013
Comment # 1

EASA AD 2013-0060 applies to LP Compressor blades that have reach 2500 flight cycles or more as of 4 Dec 2012.

PAD 13-170 paragraph (3) states to for LP Comp blades that "... on the effective date, has already exceeded 2 200 FC since last inspection, the next inspection must be accomplished before exceeding 3 000 FC since the last inspection ...".

As EASA AD 2013-0060 does not apply to LP Compressor blades that have not reach 2500 flight cycles as of 4 Dec 2012, hence not subjected to the inspection required, such blades may have already exceed 3000 flight cycles as of the effective date of this new AD (Assumed 8 Jan 2014).

E.g. Based on 3 FC a day.

4 Dec 2012 to 7 Jan 2014 = 399 Days. Assume LP Comp blade reach 2499 FC at 4 Dec 2012. 399 days is translated to 1197 FC. LP Comp blades FC as of 7 Jan 2014 will be 3696. In fact, LP Comp blades as low as 1803 FC as of 4 Dec 2012 may be affected under the such usage assumption.

Will there be guidance/grace period in the AD on such scenario?

New requirements of this AD:

- (2) For LP Compressor blades identified by serial number in Appendix 1 of RR NMSB RB.211-72-H311 that, on 04 December 2012 [the effective date of EASA AD 2012-0247], had accumulated or exceeded 2 500 FC since new, or since inspection in accordance with RR NMSB RB.211-72-G702, or since in-shop ultrasonic inspection in accordance with the Engine Manual, whichever occurred later:

- (3) For any blade that, on the effective date of this AD, has already exceeded 2 200 FC since last inspection, the next inspection must be accomplished before exceeding 3 000 FC since the last inspection. Thereafter, repetitive inspections must be accomplished as required by paragraph (1) of this AD.

EASA response:

EASA partially agrees there is a theoretical possibility of a problem as described. EASA relies on RR advice with such judgements however and the requirements on the AD in this case reflect the form of RR NMSB RB.211-72-AH465, it is therefore not anticipated that such a problem will exist.

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