

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 13-173 [Published on 21 November 2013 and officially closed for comments on 19 December 2013]

Commenter 1: United Arab Emirates – Adil Simou – 26.11.2013

Comment # 1

Our Ref: EKETSS/380/ATA53/2013/0369

Affected Aircraft Details:

A/C Model: A380

A/C Reg: Fleet

ATA: 53

Subject: Fuselage – Belly Fairing Junction Frame 35-37 / Stringer 11 –Inspection / Modification

References:

- ☐ Ref /A/: EASA PAD 13-173 (Dated 21 November 2013)
- ☐ Ref /B/: SB A380-53-8052 (Mandatory Inspection)
- ☐ Ref /C/: SB A380-53-8063 (Mod)

Ref/A/. EASA PAD was recently released (21 November 2013) and is introducing Repetitive Detailed inspection of the Edge Profile at FR35-37/ STG11 at belly fairing support structure. And further to Ref/A/ PAD compliance (Time & action) review, UAE is reporting the following enquiry:

1. Compliance Time: [Paragraph (1) of the PAD]
- The Initial Inspection should be conducted:

Compliance time (whichever occurs later, A or B)

A

Within 1 425 FC or 10 500 FH, whichever occurs first, after aeroplane first flight or since the last installation of new parts having part number (P/N) as listed in Appendix 1 of this AD, as applicable.

B

Within 150 FC or 1 100 FH, whichever occurs first, after the effective date of this AD.

- The Repetitive Inspection should be conducted at Intervals not to exceed 200 flight cycles (FC) or 1 475 flight hours (FH) (whichever occurs first).

Emirates A380 affected Fleet (Up to MSN:178) is mainly above 1 425 total flight cycles and therefore 150 FC or 1 100 FH (after the effective date of the expected AD) should be considered. However, the required inspections embodiment will require a minimum of 23.00 Hours (IAW Ref/B/ SB Manpower), which can Only be scheduled during an (A check) maintenance input. The proposed Initial Inspection threshold 150 FC or 1 100 FH (after the effective date of the expected AD) & the Repetitive Inspection Interval 200 FC or 1475 FH will Not support EK operations as the (A check) inputs are scheduled at approx. 270 FC.

2. Terminating Action: [Paragraph (3) of the PAD]

Paragraph (3) of the PAD is stating “ Modification of the belly fairing structure, as specified in paragraph (2.2) of this AD, constitutes terminating action for the repetitive inspections required by paragraph (1) of this AD”.

UAE believe that wording (terminating action) should not be used since the action (Mod) is Not definitive and still require repetitive Inspection every 11 000 FC 80 300 FH (whichever comes first). Embodiment of the MOD per Ref/C/ SB A380-53-8063 will increase from 1425 FC to 11 000 FC the inspection interval but definitely Will NOT terminate the Inspections per Ref/B/ SB A380-53-8052.

Desired Action:

1. Emirates is requesting EASA review and would appreciate if the required inspections (Initial Inspection & repetitive) can be accomplished during a scheduled maintenance input (A check input) can be better option.
2. EASA to advise whether the wording (terminating action) is suitable and can be used in Paragraph (3) of the expected AD.

EASA response:

- 1. Comment understood. An additional review with Airbus Design Office has been performed and it has been concluded that it is not possible to allow extension to the current grace period to all MSNs. Nevertheless, a grace period extension can be allowed on case by case basis after review with Airbus Design Office (ASAC) and acceptance by operator's local authority**
- 2. EASA agree. For clarification purpose, paragraph (3) has been reworded.**

Commenter 2: Qantas – Vincent Romeo – 19.12.2013

Comment # 2

1. This PAD has an extremely short grace period for compliance from an operator perspective. For your information eleven of the twelve aircraft in the Qantas fleet will have to be inspected and repaired if necessary outside of a scheduled maintenance layover. Airbus / EASA should explore the possibility to extending the grace period to give operators maximum opportunity to inspect aircraft at scheduled maintenance layovers.

2. Table 1 – Initial Inspection Part A provides the inspection threshold as follows:

“ Within 1 425 FC or 10 500 FH, whichever occurs first, after aeroplane first flight or since the last installation of new parts having part number (P/N) as listed in Appendix 1 of this AD, as applicable.”

The statement “or since the last installation of new parts having part number (P/N) as listed in Appendix 1 of this AD, as applicable” indicates that the inspection threshold applies from the time New parts listed in Appendix 1 are replaced. The AD should therefore allow the option to replace these parts at time of inspection as a repair. This could be added as item 2.3 as a pre-defined repair solution that is valid for 1425 FC or 10,500 FH after which an inspection is necessary.

3. The AD should also allow part replacement per above as an option even if NO damage is found as this will allow operators to obtain an inspection free period of 1425 FC or 10,500 FH. Suggest AD wording “ replacement of the structure listed in Appendix 1 at the time of inspection provides an inspection free period of 1425 FC or 10,500 FH after which the inspections per SB A380-53-8052 are to be accomplished and corrective action taken per para 2 taken”

EASA response:

1. Comment understood. An additional review with Airbus Design Office has been performed and it has been concluded that it is not possible to allow extension to the current grace period to all MSNs. Nevertheless, a grace period extension can be allowed on case by case basis after review with Airbus Design Office (ASAC) and acceptance by operator's local authority. It is to be noted that the grace period (150 FC/1100 FH) is to be counted from the effective date of the final AD.

2. and 3. EASA agree in principle. However, the P/N listed in Appendix 1 are not manufactured any-more. Standard P/N which are manufactured and delivered are the post mod parts (P/N listed in Modification SB 53-8063). A380 production a/c are now also fitted with the post mod parts. Nevertheless paragraph (2.1) has been clarified to cover the case of a replacement of the parts by new parts having part number (P/N) as listed in Appendix 1 of this AD.

Commenter 3: Korean Air –Sung-il PARK – 18.12.2013

Comment # 3

With regard to the cracks reported by several A380 operators in the belly faring on FR35-37 Strg 11, Airbus issued Ref/1/.

And if there are any findings during perform Ref/1/, Ref/2/ should be done before next flight.

Ref/1/ is mandatory and has compliance time, threshold 1425FC/10500FH and grace period 150FC/1100FH.

By the way, KAL MSN035~MSN075 has been already exceeded the threshold 1425FC/10500FH and they need to be done Ref/1/ in 150FC/1100FH from Oct.31.2013 i.e. in Jan.2014.

According to our experience on MSN068 and other operators report, there must be damages on the Strg 11 profiles and need to perform the Ref/2/ before next flight. Even there is no damage findings when doing Ref/1/, no operator wants to do Ref/1/ every 200FC/1475FH interval.

However, Airbus' limited SB kit capacity makes the operator in difficulty to perform Ref/1/ and Ref/2/ together within compliance time.

In this regard,

Q1. Would you make sure if Ref/1/ compliance time, the threshold and the grace period, can be extended?

Q2. Provide the Ref/2/ kits on time as per operator's request.

EASA response:

Comment understood. An additional review with Airbus Design Office has been performed and it has been concluded that it is not possible to allow extension to the current grace period to all MSNs. Nevertheless, a grace period extension can be allowed on case by case basis after review with Airbus Design Office (ASAC) and acceptance by operator's local authority. It is to be noted that the grace period (150 FC/1100 FH) is to be counted from the effective date of the final AD.