

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 14-018 [Published on 23 January 2014 and officially closed for comments on 20 February 2014]

Commenter 1: Lufthansa Technik – Thorsten Koch – 23/01/2014

Comment # 1

Applicability:

MOD Description 160055: “APPLY COLD WORKING AND REPLACE RIVETS IN THE WASTE AND POTABLE WATER SERVICE PANELS AREAS AT S18”

MOD Description 160056: “APPLY COLD WORKING AND REPLACE RIVETS IN WATER SERVICE PANELS AREA AND INNER CAP JOINT - ADAPTATION SOLUTION”

Note that 160056 does not explicitly mention the Waste Service Panel to be modified. Also the applicability of both ALI 534125 and ALI 534126 acc. ALS Part 2 Rev. 02 is “PRE 160055”, 160056 is not mentioned. It is recommended to check that the statement “except those on which Airbus modification (mod) 160055 or Airbus mod 160056 have been embodied” is true.

Paragraph (3): The paragraph should conclusively identify the ALS Part 2 task(s) and subset of aeroplanes affected by the requirement. The current wording (“during this ALS Part 2 task”) does not specify, if this AD requires modification prior next flight in case of findings

1. ALS part 2 Task No. 534126-01-3, with reference to (2) Table 2 Condition B requirement (i.e. A320 PRE 160500 only), or
2. Any ALS Part 2 Task listed in the Table 5 (ALL).

From the technical discussion we had with Airbus so far, we conclude that situation 1 is correct.

Paragraph (3): The wording “If discrepancies are found” is too severe, as according standard technical language (PPH etc.) “discrepancy” also encompasses corrosion, dents, etc. – whereas from the CS 25.571 point of view the critical issue is onset of Widespread Fatigue Damage.

We therefore propose to reword the requirement as follows: “(3) For A320 pre-mod 160500 aeroplanes having exceeded 46 400 FC or 92 800 FH, whichever occurs first since aeroplane first flight, if cracks are found during accomplishment of ALS part 2 Task No. 534126-01-3, before next flight, modify the waste water service panel in accordance with the instructions of Airbus SB A320-53-1267 Revision 01.”

Paragraph (3): We request that EASA and Airbus review the requirement of modification prior next flight; the ALS part 2 Task No. 534126-01 is an HFEC inspection from external without access requirements. It can thus be accomplished in line maintenance during night stop. The required special tooling for modification may not be available at the maintenance station. However, there may be options available to repair the cracked area and certify that repair by RAS for some additional flights (Life Limited Repair). We consider that the requirement of modifying the airplane prior next flight is too severe. We think that a statement like “before next flight, contact Airbus for corrective action and accomplish these” may be more appropriate and provide the flexibility. It should be noted that in this case Airbus may decide to either approve a life limited repair, or to instruct SB accomplishment, based on the findings.

Please note that if Airbus and EASA can concur with this opinion, then Paragraph (6) must be revised to remove the reference to Para (3).

Paragraph (4): The usage of “and/or” creates logical permutations which are not allowed, such as “Airbus SB A320-53-1267 at original issue or SB A320-53-1272 at original issue, is acceptable to comply with the requirements of paragraphs (1) and (2) of this AD.”

Moreover, it is written in the wrong sequence: A320-53-1267 is related to Para (2), but is written before A320-53-1272. So, there may be some confusion which is the correct combination.

It [is] proposed to split Paragraph (4) into two separate paragraphs, one for SB 53-1267 related to Para (2), and one for SB 53-1272 related to Para (1).

Paragraph (5): Table 4: Typo in line 4. Must read “A320 post-mod 160500” instead of “A320 pre-mod 160500.”

Paragraph (5): Referenced ALS tasks for POST 160500 or POST 160023, as applicable, do not exist in ALS Part 2 Rev.02. We assume that these will be published with ALS Part 2 Rev. 03? Could you please confirm? If this is the case, these tasks will likely be published in the ALS with an applicability “PRE 153074 PRE 160055 POST 160500” (A319, A320) or “PRE 153074 PRE 160055 POST 160023” (A321). The referenced tasks for PRE 160500 (-2, -3, -4) already have such applicability statement as per ALS Part 2 Rev. 02 (e.g. “PRE 153074 PRE 160055 PRE 160500”).

It therefore seems that this entire paragraph is not required.

Note: Mod 153074 is embodied by means of SB 53-1272

Paragraph (6): Same as above; the relevant Mod is here 153073, retrofitted thru SB 53-1267. It therefore seems that this entire paragraph is not required.

EASA response:

We confirm that AD applicability is correct. MOD 160056 mentions “PANELS” in plural, so including both WASTE and POTABLE. MOD 160056 does not appear in ALI 534125 and ALI 534126 as all POST 160056 aircraft (7 A320, 1 A321 and 2 A319) are also POST 160500 and currently only requirements are 534125-01-3 and 534126-01-3 for A320 PRE 160500 so no need to state PRE 160056 as it is redundant. No changes have been made to the Final AD in response to this comment.

Comments on par (3) to modify for clarification are agreed. Final AD has been modified accordingly.

Comment on par (3) to modify to “before next flight, contact Airbus for corrective action and accomplish these” agreed. Final AD has been modified accordingly.

Comment on par (4) is agreed. The Final AD has been modified accordingly.

Comment on par (5) typo error is agreed. The Final AD has been modified accordingly.

Comment on par (5) We confirm that POST 160001 or POST 160021 tasks will be published in Airbus ALS Part 2 Rev. 03. The Final AD has been updated accordingly to be aligned with future ALS part 2 revision 3.

Comment on par (6) is not agreed. The Final AD has not been changed to minimize wrong operator interpretation.

Commenter 2: Lufthansa Technik (on behalf of German Air Force) – Raik Bauer – 24/01/2014

Comment # 2

Comments on behalf of German Air Force (GAF) operating A319CJ in pre-mod 160500 condition.

Per definition ALS Part 2 contains airworthiness limitations arising from fatigue and damage tolerance evaluation of damage tolerant structural elements whose failure could contribute to catastrophic failure of the aircraft (FAR/JAR 25.571). It also contains airworthiness limitations arising from an initial evaluation of Widespread

Fatigue Damage.

Due to their operational profile and an ALS Part 2 LOV of 18000 FC / 77400 FH, A319 CJ (Group 19-1C) are not affected by the requirements of ALS Part 2 Items 534125-01-* and 534126-01-* respectively. AIRBUS analyses revealed that fatigue cracking is not expected on these aircraft within their certified operational lifetime.

It is therefore concluded that a PAD compliance time of 48500 FC / 97000 FH for accomplishment of SB 53-1272 and 44400 FC / 88800 FH for accomplishment of SB 53-1267 on pre-mod 160500 A319 aircraft cannot be reached based on the certification basis of A319CJ aircraft. The same applies to all PADs/ADs covering fatigue related modifications with a compliance time beyond ALS Part 2 LOV.

For potential future A319CJ life extension programs and associated modifications, dedicated ADs and /or modification based ALS requirements will have to be issued. However, since those programs are not in place it is deemed not reasonable to track mandatory modification requirements which can certification-wise not be reached.

On behalf of GAF, it is kindly requested to review this conclusion and eventually delete A319CJ aircraft (Post 28162, 28238, 28342) from the PAD/AD applicability.

EASA response:

Comment not agreed. EASA does not agree to systematically exclude configurations when actions are required beyond their specific operational limit. It remains operator's choice to decide the exact moment of modification embodiment, as long as that is below the required threshold. The requirements remain applicable to the aeroplane model to anticipate any possible future operational limit extension.

Commenter 3: American Airlines – Richard Castle – 28/01/2014**Comment # 3**

Subject PAD is applicable to all A319, A320 and A321 a/c except those on which Airbus modification 160055 or 160056 have been embodied in production. We believe the “or” should read “and”.

The service documents for these modifications are listed as Service Bulletins A320-53-1272 and A320-53-1267, and upon review these appear to correct documents, however when reviewing the SB's we note that modification numbers 153073 and 153074 are quoted in them rather than 160055 and 160056 as denoted in the PAD. We are taking this up with Airbus directly but thought EASA might want to be aware. Also, we notice that SB A320-53-1272 Rev. 01 only lists A319 and A320 Series aircraft on the affectivity list. SB A320-53-1267 has recently been revised to Rev. 01 to add the A321 Series a/c. This means that as currently written AAL & USA have 15 & 165 aircraft respectively affected by SB A320-53-1272 Rev. 01 and 24 & 257 aircraft respectively affected by SB A320-53-1267 Rev. 01 and we believe that the effectivity numbers should be the same. Again, we are taking this point up directly with Airbus but wanted to bring it to EASA's attention prior t release of the final AD.

EASA response:

Comment on Applicability paragraph is not agreed: MOD 160055 is the production solution, whereas MOD 160056 is the in-service solution, so they cannot be embodied together. Therefore it should be “or” and not “and”

New MOD refs have been created for the MSBs. The Reason paragraph of the Final AD has been updated accordingly. Current SB A320-53-1272 original issue and revision does not include A321 MSN. It is anticipated that future revisions of this SB will include A321, as needed.

Changes have been made to the Final AD in response to this comment.

Commenter 4: EasyJet – Andrew Knight – 30/01/2014**Comment # 4**

Easyjet Structures has reviewed the subject document and has no enquiries or comment to make.

EASA response:

Comment noted and appreciated.

Commenter 5: Air France – Ludovic Mbara – 04/02/2014**Comment # 5**

1- AFR notices a typo error in table 4 : Affected aeroplanes column and line 3 & 4. It repeats Pre-mod 160500 two times. AFR believes that it should be Post-Mod for line 4. Please could you take in account this remark and modify the table4 page 3/3.

2- ALS Part 2 Tasks N° 534125-01-6 and 534126-01-6 missing: AFR did not get the ALS Part 2 listed above description in MPD manual. are they new? If yes, could you provide us more detail as A320 Post-Mod 160500 exist in AFR Fleet.

3- Compliance time of waste water service panel reinforcement are more restricted than those defined on Potable water service panel (Table 1 / Table 2). Could you explain us why this difference? If we consider that area in Waste Water service panel are more sensitive than Potable water area, all compliance time in table 1 potable water are greater than those in table 2 except for A320 Post-Mod 160500.

value for Waste > Potable (39200FC/78400FH >36000FC/72000FH).

Please could you confirm this compliance line?

EASA response:

1- Comment agreed. The Final AD has been modified accordingly.

2- Please see response to Comment #1

3- AIRBUS confirms that published values in waste and potable water panels for A320 Post-Mod 160500 are correct, i.e. 39200FC/78400FH and 36000FC/72000FH respectively.