

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 14-032 [Published on 5 February 2014 and officially closed for comments on 5 March 2014]

Commenter 1: Lufthansa Technik – Andreas Halske – 07/02/2014

Comment # 1

Comments to paragraph (3):

In case a hole diameter is not in tolerance, the approved repair instructions from Airbus have to be accomplished. For that specific repaired hole the need and definition of subsequent repetitive inspections, if required, is defined in the applicable Repair Design Approval Sheet (RDAS).

It should be clarified that for the specific repaired area, the repair constitutes terminating action for the repetitive inspections as required by paragraph (1) of this AD.

Comments to paragraph (5):

It is absolutely clear that the accomplishment of the corrective actions in accordance with the instructions of Airbus SB A330-53-3215 or SB A340-53-4215 does not contribute terminating action for the repetitive inspections as required by paragraph (1) of the AD.

But in paragraph (5) it should also be clarified that under some condition, e.g. accomplishment of a specific repair as defined in paragraph (3), a repair contributes terminating action for the repetitive inspections required by paragraph (1) of the AD. The specific repaired hole has to be inspected as per subsequent repetitive inspections, if any, given in the applicable RDAS.

EASA response:

Comment partially agreed.

As it is known to operators, RDAS is an individual document dedicated to specific Manufacturer Serial Number. Usually, at the time of AD issuance, the Individual RDAS is not established yet. At this time neither Airbus nor EASA know the technical content of the forthcoming RDAS about the repair instructions if it includes a temporary repair or life limited repair or permanent repair (with or without inspection requirements). When the repair solution is available and depending on its definition and classification, Airbus may apply for an EASA AMOC approval to be provided to the customer. If applicable, this EASA AMOC may state that the repair constitutes terminating action for the mandatory repetitive inspections.

Some changes have been made to the Final AD in response to this comment for consistency with the above practice.