

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 14-083 [Published on 21 May 2014 and officially closed for comments on 18 June 2014]

Commenter 1: Royal Jordanian Airlines – Ahmad F. Anabtawi – 22/05/2014

Comment # 1

Regarding reference PAD issued on 21 May 2014, which refers to Airbus SB Airbus SB A340-78-4030 Revision 04 which states that Accomplishment of Service Bulletin No. A340-78-4029 (or Mod. No. 50998S16721) and Service Bulletin No. A340-78-4033 (Mod. No. 55902S18806) cancels the inspection requirements of this Inspection Service Bulletin.

My question is, does the embodiment of Airbus SB A340-78-4029 (RA340A78-73) or Airbus SB A340-78-4033 (RA34078-89) considered as terminating action only for respective position inspection? In other words.

Is embodiment of Airbus SB A340-78-4029 (RA340A78-73) a terminating action for 12 o'clock Inspection ?

Is embodiment of Airbus SB A340-78-4033 (RA34078-89) a terminating action for the 6 o'clock Inspection?

EASA response:

Comment understood and partially agreed. It is correct that embodiment of Airbus SB A340-78-4029 is terminating action for the 12 o'clock position and that embodiment of Airbus SB A340-78-4033 is terminating action for the for 6 o'clock position, which means that if only one position is modified, the inspection remains applicable for the other position. However, as the AD applies at 'aeroplane' level and not at 'thrust reverser' level, EASA consider that this is sufficiently implied by paragraph (7). Paragraph (1) of the Final AD, related to aeroplane production modification, has been amended accordingly.

Commenter 2: Virgin Atlantic Airways Ltd. – Jim Guneratnam – 09/06/2014

Comment # 2

VAA has two comments regarding PAD 14-083 and are provided below

1. Comment on Item (7) of PAD 14-083

Item (7) of PAD 14-083 suggests that previous modification of J-Rings are acceptable if the associated J-Ring was inspected IAW SB A340-78-4030 prior to incorporation of modification and found to be crack free.

Modification of “J-Ring” on any T/R unit is undertaken in Airline service environment in response to either:

- (a) Crack finding during the performance of inspection IAW SB A340-78-4030 or
- (b) Campaigned modification action during T/R overhaul to incorporate SB A340-78-4029 and or SB A340-78-4033. However, the modification data does not require inspection of J-Rings IAW SB A340-78-4030 as a conditional inspection to incorporate the modifications.

Under these circumstances it may be difficult to demonstrate that the J-Ring was crack free prior to modification

It is therefore identified that an alternate procedure be stipulated in the AD to validate that the J-Ring was crack free at modification site (6 or 12o'clock location) if J-Ring status before modification was verified through record search

Performance of ALI Task 722301-01-01; V-Groove inspection and crack free finding of V-Groove is a possible candidate to demonstrate that the J-Ring was crack free prior to modification.

2. Comment on Item (9) of PAD 14-083

References;

/A/: AD2009-0056; Exhaust-Thrust Reverser “J-Ring” at 6 and 12o'clock Beam- Inspections

/B/: SB A340-78-4030; Inspection of Thrust Reverser Structure “J-Ring”

/C/: SB A340-78-4033; Modification of Thrust Reverser “J-Ring” at 6o'clock

/D/: SB A340-78-4029; Modification of Thrust Reverser “J-Ring” at 12o'clock

/E/: PAD No. : 14-083; Exhaust-Thrust Reverser “J-Ring” at 6 and 12o'clock Beam- Inspections / Replacement

Action Items 3 of Reference /A/ AD allowed continued operation of any Thrust Reverser Cowl

- (a) with J-Ring modified / reworked at 12o'clock IAW Reference /D/ and
- (b) with J-Ring at 6o'clock inspected IAW Reference /B/

Similarly,

Action Items 4 of Reference /A/ AD allowed continued operation of any Thrust Reverser Cowl

- (c) with J-Ring modified / reworked at 6o'clock IAW Reference /C/ and
- (d) with J-Ring at 12o'clock inspected IAW Reference /B/

It would be helpful to operators if the existing provisions contained in the Action Items 3 and 4 of Reference /A/ are explicitly integrated into Action Item (9) of Reference /E/.

A proposed draft of Item (9) is suggested below:

(9) From the effective date of the AD, installation of unmodified and partially modified T/R units on any aeroplane is allowed, provided that each:

- (i) T/R unit with J-Ring unmodified both at 6 and 12o'clock need to have inspections of J-Ring performed at 6 and 12o'clock IAW SB A340-78-4030R04
- (ii) T/R units with J-Ring previously modified/ reworked at 12o'clock position only need to have J-Ring at 6o'clock inspected IAW SB A340-78-4030R04
- (iii) T/R units with J-Ring previously modified/ reworked at 6o'clock position only need to have J-Ring at 12o'clock inspected IAW SB A340-78-4030R04

All defects are to be repaired prior to further flight.

EASA response:***Comments understood and partially agreed.******EASA answer to point 1: It is reminded that the repetitive inspections and associated corrective actions of the T/R J-Ring structure at 12 o'clock and 6 o'clock positions are mandatory since a long time through CFM Service Bulletin (SB) 78-A0072 Revision 2/ROHR SB RA34078-72 Revision 2 and thereafter through cover AIRBUS SB A340-78-4030. Thus, any crack detection is already tracked and corrected. EASA position is that the condition required by paragraph (7) may be easily demonstrated based only on Airbus SB A340-78-4030 accomplishment.******EASA answer to point 2: The commenter's statement is confirmed as correct and in line with the intent of the AD. However, EASA finds that it is sufficiently implied by the wording of paragraph (7) of the AD.******No changes have been made to the Final AD in response to these comments.***