

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 14-146 [Published on 09 October 2014 and officially closed for comments on 06 November 2014]

Commenter 1: Air France – Nicolas Gigandet – 14/10/2014

Comment # 1

Please be informed that AFR reviewed PAD 14-146 relative to new modification of BDDV and has following comment :

Even if we understand reason that conducted to propose new modification, we believe that proposal is not technically adequate on a long time period. Solution consist in letting opened the draining tube. Obviously it will be convenient on a water draining purpose but as a revert effect this will let a communication between exterior and BDDV mechanism.

So it is quite obvious that this will cause water / dirt ingress and also continuous breathing between cold metallic part and hot air (or inversely) with humidity deposit. And as BDDV internal mechanism is not protected against corrosion this will lead to other issues also potentially affecting A/C safety (as arms jamming or rupture (hidden failure)).

We would like to highlight that first modification as per SB 32-1200 was to drill a hole in the cover and was not retained as final fix for this reason. It was also assorted with a repetitive inspection of BDDV mechanism (not reintroduced by PAD).

For AFR, proposed solution is not adapted and has to be reviewed prior to be mandated.

EASA response:

MOD 155579 - SB A320-32-1415 removes the MRB task 32.40.00/12 (visual check every 400 days) associated to MPD Task 324314-01-1.

Airbus reviewed and anticipated the impact of environmental conditions onto the post MOD155579 BDDV design and subsequently carried out equipment qualifications accordingly. At present, dedicated repetitive inspections have not been identified to ensure integrity of the subject BDDV. Should such actions be required, Airbus will define any adequate task that will be incorporated in the Single Aisle maintenance program accordingly.

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