


EASA	COMMENT RESPONSE DOCUMENT
	<p style="text-align: center;">EASA PAD No. 14-156 [Published on 23 October 2014 and officially closed for comments on 20 November 2014]</p>

Commenter 1: Air France – Stephane Canon – 27/10/2014

Comment # 1

Concerning the paragraph (9) of this PAD:

(9) Within 36 months after the effective date of this AD, modify the green, blue and yellow high pressure hydraulic manifolds by replacing each check valve P/N CAR401 with an improved check valve P/N CAR402 in accordance with the instructions of Airbus SB A330-29-3125, or Airbus SB A340-29-4096, as applicable to aeroplane type.

Paragraph (4) mentions:

If during the inspection as required by paragraph (1) of the AD, it is identified that check valves P/N CAR401 **are not installed on all three hydraulic systems**, no immediate further action is required, except if a check valve P/N CAR400 is replaced with a check valve P/N CAR401; before next flight after that replacement, the aeroplane configuration must be inspected to determine if all three hydraulic systems are equipped with check valves P/N CAR401, in which case the requirements of paragraphs (2) and (3) of this AD must be accomplished.

As mentioned in the reason of this PAD, the check valve installed on the yellow hydraulic circuit is the more affected.

In accord with the paragraph (4) and in the case of only one check Valve CAR401 is installed on all hydraulic circuit, but not on the yellow hydraulic circuit; is this case concerned by paragraph (9).

If YES:

AFR would like to propose the following paragraph instead of the paragraph (9):

"Within 36 months after the effective date of this AD, modify each check valve CAR401 installed on aeroplane with an improved check valve P/N CAR402 in accordance with the instructions of Airbus SB A330-29-3125, or Airbus SB A340-29-4096, as applicable to aeroplane type."

If NO:

AFR would like to propose the following paragraph instead of the paragraph (9):

"Within 36 months after the effective date of this AD, it is identified that check valves P/N CAR401 **are installed on all three hydraulic systems**, modify the green, blue and yellow high pressure hydraulic manifolds by replacing each check valve P/N CAR401 with an improved check valve P/N CAR402 in accordance with the instructions of Airbus SB A330-29-3125, or Airbus SB A340-29-4096, as applicable to aeroplane type. "

EASA response:

Comment understood. EASA confirm that each check valve P/N CAR401 has to be replaced with a check valve P/N CAR402, regardless on which hydraulic system it is installed. Each replacement can be accomplished separately, this is also good maintenance practice to accomplish each replacement not at the same time over the period of 36 months from the effective date of this AD.

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

Commenter 2: Iberia – Luis de Benito Abad – 29/10/2014

Comment # 2

It is mandated the accomplishment of SB A340-29-4096 if no Check Valves P/N CAR401 are installed on A340 aircraft?

EASA response:

Comment understood. Installation of check valve P/N CAR402 through embodiment of Airbus SB A340-29-4096 is only required for aeroplanes equipped, on the effective date of this AD, with check valve P/N CAR401.

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

Commenter 3: Hl FLY – Rui Cavaco – 30/10/2014

Comment # 3

Hypothetical case: only check valves P/N CAR400 are installed on all three hydraulic systems.

Paragraph (9)

The modification is to be performed, as we see, only on those positions fitted with check valves P/N CAR401. Therefore, the domain could be reformulated to “green, blue and yellow high pressure hydraulic manifolds (as applicable)”. For the case above, paragraph (9) should not introduce any further immediate action.

Paragraph (11)

If paragraph (9) does not introduce any further immediate action, a wrongful interpretation of paragraph (11) could lead to the future installation of check valves P/N CAR401 in this case. We believe the restrictions noted on paragraph (11) should be extended to aircraft covered in the case presented, but from the effective date of the AD.

EASA response:

Comment agreed. Paragraph (11) of the final AD has been amended to address this comment.

Commenter 4: HI FLY – Rui Cavaco – 04/11/2014**Comment # 4**

Airbus SB A330-29-3124 and SB A340-29-4095 (retrofit MOD 203796) are related to upgrade from CV P/N CAR400 to CV P/N CAR402.

A330 and A340-200/-300 aeroplanes which have these SBs fully embodied should also be excluded from the forthcoming AD's applicability, because the end result will be equivalent to production MOD 203972.

A330 and A340-200/-300 aeroplanes which have these SBs partially embodied should be verified against the forthcoming AD's applicability, on the positions which have not been modified in-service.

On the other hand, in case the Applicability refers that RACT only apply to manifolds where CV P/N CAR401 is installed, the above will then be void.

EASA response:

Comment understood. However, the unsafe condition is only present for Check Valve CAR 401 and the new requirement of this AD is to replace each Check Valve P/N CAR 401 with P/N CAR 402, and not to replace check valve P/N CAR 400 with P/N CAR 402.

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