

Comments in Response to “Final rule; request for comments” (IAR)

AD 2023-10-09

Docket: FAA-2023-1055

Product Identifier: AD-2023-00583-T

ISSUE 1: Request to revise the definition of a “serviceable panel”

Commenters: American Airlines, Boeing, and United Airlines

What change to the AD is requested? American Airlines, Boeing, and United Airlines requested that the FAA add to the definition of a “serviceable panel” that a decompression panel repaired using an approved maintenance program is also considered serviceable.

Why is the change requested or how is it justified? The commenters stated this change would allow operators to perform approved Boeing Aircraft Maintenance Manual (AMM) repairs without the need for an alternative method of compliance (AMOC) in the case replacement parts are not available.

FAA’s response: FAA letter 877-23-00080, dated July 5, 2023, approves accomplishment of a temporary repair of cargo compartment vertical sidewall lining decompression panel edge-holes in accordance with reference AMM Task B787-A-50-11-08-06A-664A-A Issue 002, dated July 1, 2023, as an AMOC to accomplishment of a repair method approved by the Boeing Company ODA, to generate a “serviceable panel,” as defined in paragraph (g)(3) of AD 2023-10-09. In addition, the FAA has approved Boeing Requirement Bulletin (RB) B787-81205-SB500012-00 RB, Issue 001, dated September 6, 2023, as a global AMOC to paragraph (g), (h), and (i) of AD 2023-10-09, and it includes the option to perform temporary repair of the cargo compartment vertical sidewall lining decompression panel edge-holes in accordance with AMM 50-11-08. However, if any operator would still prefer a change to the definition of “serviceable panel,” they may request an AMOC in accordance with paragraph (l) of AD 2023-10-09. The FAA has not changed AD 2023-10-09 in this regard.

ISSUE 2: Request to increase the compliance time for the inspections

Commenters: Boeing, Japan Airlines, and United Airlines

What change to the AD is requested? Boeing requested that FAA change the compliance interval for repeat inspections from 90 days to 4 months. Japan Airlines also requested that the FAA reconsider the compliance time for the initial inspection of within 90 days. United Airlines requested that after the initial inspection, the repeat inspection interval be increased to every 120 days instead of 90 days.

Why is the change requested or how is it justified? Boeing requested the change to align with maintenance planning. United Airlines requested the change to better align with the already established maintenance interval. Japan Airlines noted that spare parts for replacement are not enough worldwide at this moment given that operators are likely to replace the panel instead of doing the repair allowed by the AMOC, FAA letter 877-23-00080, dated July 5, 2023, which also requires a repetitive inspection of the repaired panel every 7 days.

FAA's response: The FAA assessed the risk and determined that a 90-day compliance time for the initial inspection and 90-day repetitive inspection interval are appropriate to mitigate the risk. This AD is interim action to minimize the exposure of the fleet to the unsafe condition, as the terminating action is still being investigated by Boeing. The FAA used the estimated number of hours to do the inspection to determine the shortest practical inspection interval. The shortest practical inspection interval was used due to the significance of the unsafe condition per FAA policy in Order 8110.107A Monitor Safety / Analyze Data (MSAD) and the Transport Airplane Risk Assessment Methodology (TARAM) Handbook available at [drs.faa.gov](https://www.faa.gov/drs). The FAA recently issued a global AMOC, FAA letter 523-24-00132, dated October 18, 2024, to extend the repetitive inspection interval from 90 days to 125 days. The initial inspection of within 90 days has not changed. If any operator wants to extend the compliance time interval for the inspections, they may request an AMOC in accordance with paragraph (l) of AD 2023-10-09 and should include justification that the new compliance time address safety. The FAA has not changed AD 2023-10-09 in this regard.

ISSUE 3: Request for clarification on note 3 to paragraph (i)(1) of AD 2023-10-09

Commenter: EVA AIR

What change to the AD is requested? EVA AIR requested clarification on note 3 of paragraph (i)(1) of this AD.

Why is the change requested or how is it justified? EVA AIR stated that Note 3 refers to Boeing 787 AMM Task B787-A-50-11-06-03A-520A-A and Boeing 787 AMM Task B787-A-50-11-06-03A-720A-A as additional guidance for reinstalling the decompression panel required by paragraph (i)(1) of this AD or replacing any damaged panel required by paragraph (i)(2) of this AD. EVA AIR asked if the correct AMMs should be B787-A-50-11-08-05A-520A-A and B787-A-50-11-08-05A-720A-A.

FAA's response: The FAA agrees to clarify note 3 of paragraph (i)(1) of this AD. The AMM Tasks B787-A-50-11-06-03A-520A-A and B787-A-50-11-06-03A-720A-A have removal and installation instructions for the cargo compartment vertical sidewall lining, which includes maintenance access panels and the decompression panels. The AMM Tasks B787-A-50-11-08-05A-520A-A and B787-A-50-11-08-05A-720A-A are specific to the decompression panels. The AMM Tasks B787-A-50-11-08-05A-520A-A and B787-A-50-11-08-05A-720A-A have removal and installation instructions for only the decompression panels. All of four of the tasks (the -06-03A AMM Tasks and -08-05A AMM Tasks) have the same instructions for the decompression

panels. The difference is that AMM Tasks B787-A-50-11-08-05A-520A-A and B787-A-50-11-08-05A-720A-A are specific to the decompression panels and do not include the maintenance access panels. Therefore, the referenced AMM Tasks B787-A-50-11-06-03A-520A-A and B787-A-50-11-06-03A-720A-A are more comprehensive in the panels covered than AMM Tasks B787-A-50-11-08-05A-520A-A and B787-A-50-11-08-05A-720A-A. The FAA also notes that the AMM tasks referenced in note 3 to paragraph (i)(2) of AD 2023-10-09 are only for additional guidance and not required tasks. The FAA has not changed AD 2023-10-09 in this regard.

ISSUE 4: Request to reconsider the repetitive inspection interval for the temporary repair

Commenter: Japan Airlines

What change to the AD is requested? Japan Airlines requested that the FAA reconsider the requirement to perform the repetitive inspections at intervals not to exceed 7 days for the temporary repair done in accordance with AMM Task B787-A-50-11-08-06A-664A-A Issue 002, dated July 1, 2023, which was approved as an alternative method of compliance (AMOC) in FAA approval letter 877-23-00080.

Why is the change requested or how is it justified? Japan Airlines stated that the temporarily repaired panels require a general visual inspection every 7 days which is a maintenance burden for operators. Japan Airlines also stated if an operator replacing a panel to avoid the repetitive inspection, then the spare parts for replacement are not available worldwide at this moment.

FAA's response: The FAA notes that the commenter is referring to FAA letter 877-23-00080, dated July 5, 2023, that approves accomplishment of a temporary repair of cargo compartment vertical sidewall lining decompression panel edge-holes in accordance with reference AMM Task B787-A-50-11-08-06A-664A-A Issue 002, dated July 1, 2023, as an AMOC to accomplish of a repair method approved by the Boeing Company ODA, to generate a "serviceable panel," as defined in paragraph (g)(3) of AD 2023-10-09. Boeing performed testing of the temporary repair method and determined that the repaired panels may inadvertently move. Therefore, an inspection interval not to exceed 7 days is necessary to make sure the repaired panels do not inadvertently move. If any operator wants to request an alternative compliance time for AMOC letter 877-23-00080, they may request an AMOC in accordance with paragraph (l) of AD 2023-10-09. The FAA has not changed AD 2023-10-09 in this regard.

ISSUE 5: Request to clarify the rationale for Air Transport Association (ATA) of America Code 26

Commenter: Qatar Airways Company

What change to the AD is requested? Qatar Airways Company requested that the FAA clarify why the AD was issued under ATA 26 instead of ATA 50.

Why is the change requested or how is it justified? No information.

FAA's response: ATA 26 addresses fire protection and ATA 50 addresses cargo compartment. The decompression panels are located in the cargo compartment, but the unsafe condition is related to fire protection. The damaged decompression panels excessively reduce the required fire protection system. Therefore, the FAA issued the AD under ATA 26 instead of ATA 50. The FAA has not changed AD 2023-10-09 in this regard.

(This form is part of the official docket file for this AD action.)