

JAA/FAA/TCCA
International MRB Policy Board
Issue Paper

Date 18 June 2003
IMRBPB # 60

Title Fuel Tank Policy Harmonized Position

Submitter Airbus

Issue

OEMs must assess their fuel tank systems against SFAR 88 and INT/POL 25-12. Any findings associated with an “unsafe condition” will be addressed by mandatory action. Non-compliance issues that are not related to an “unsafe condition” are to be addressed through traditional methods appropriate for Maintenance Program Development. These methods include, but are not limited to. Inspection bulletins, additional or modified MRB tasks, update AMM procedures and/or updated maintenance practices.

Problem

The discussion and subsequent agreement of what constitutes an “unsafe condition” is to be made by the primary Aircraft Certification Office responsible for the type Certificate. It has been agreed that this decision will be accepted by ACO,s in other Countries where a Type Certificate has been issued. For example, for Airbus types, FAA will accept the DGAC position. There is concern that despite this bilateral Agreement at the ACO level, the OEM may witness attempted discussion on “unsafe Condition” during MRB activity (where foreign Authorities are present in addition to the primary Authority). Such discussions risk undermining decisions taken by the ACO.

Recommendation.

MRB,s are advised that where the OEM proposes that a non compliance issue is addressed by a change to the MRB Report, it is inappropriate to re-open discussion on whether specific failures are, or are not, associated with an “unsafe condition”.

IMRBPB Position. With reference to Section 1-1, third paragraph of MSG-3, additional requirements developed using different ground rules and procedures from MSG-3 must be submitted with selection criteria to the Industry Steering Committee for consideration and inclusion in the MRB Report recommendation. Notwithstanding this section, the IMRBPB supports the concept that MSG-3 should be sufficient to develop the initial scheduled maintenance program. Any need for adjustment of an existing MRBR should be conducted using the latest version of MSG-3 taking into consideration the recommendations as stated above. Note: While the issue is closed it was recognized there is a need to have further discussion on this matter.

August 20, 2003, IMRBPB agrees

IP Closed

Important Note: The IMRBPB positions are not policy. Positions become policy only when the policy is issued formally by the appropriate National Aviation Authority. (JAA, FAA or TCCA)