Title: Discard Task Interval Incorporation by Reference in the MRBR

Submitter: FAA

Issue: Policy clarification is needed regarding the practice of referencing Airworthiness Limitations section of ICA for MSG-3 discard task intervals with a corresponding safe-life (Structures) or life limit (Systems).

Problem: Many discard tasks have a corresponding safe-life or life limit in the Airworthiness Limitations (ALS) section of ICA. Many of these limits are subject to frequent revision (normally escalation) by aircraft certification. The ISC and MRB have no control over these changes, and maintaining a one to one link between MRBR and ALS task intervals adds no value to the process. See attached (redacted) example from a recent MRBR.

Recommendation (including Implementation):

Establish a policy (in NAA guidance) that when MRBR discard tasks have a corresponding safe-life limit or life limitation, that interval (which is controlled by the airworthiness limitation section of the ICA) may be incorporated by reference within the MRBR (in other words, a reference to the document controlling the limitation is allowed, rather than restating the limit in the MRBR.) Extensions or deletions to safe-life limits or life limitations following initial MRBR approval should subsequently be reviewed by the ISC to ensure that the MRBR discard tasks remain applicable and effective.

IMRBPB Position:

Date: April 22, 2015
Position: Accepted with the addition of the word “subsequently”. Closed as IP 145.

Status of Issue Paper (when closed state the closure date): Closed April 22, 2015

Recommendation for implementation: To be implemented in the IMRBPB MRB Process Standard.

Retroactive: No

Important Note: The IMRBPB positions are not policy. Positions become policy only when the policy is issued formally by the appropriate National Aviation Authority.