

COMMENT RESPONSE DOCUMENT

EASA PAD No.: 26-114

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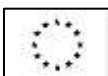
Commenter 1: ANA Power Plant – Keiichiro Shigeru – 22/10/2026

Comment # 1

- A. PAD 26-114 defines "The NMSB" as Rolls-Royce Alert Non-Modification Service Bulletin (NMSB) TRENT 1000 72-AK316 Revision 7. ANA has engines that were inspected in accordance with SB TRENT 1000 72-AK316 Revision 6 prior to the effective date of the future EASA AD originating from PAD 26-114. We understand that HPT blades inspected per Revision 6 can be credited against the requirements of the new AD (succeeding EASA AD 2025-0206R1).
Please confirm if this understanding is correct. If so, we kindly request EASA to incorporate a "Credit" paragraph into the new AD to explicitly state this eligibility.
- B. 2. If credit is granted for inspections accomplished under SB TRENT 1000 72-AK316 Revision 6 prior to the effective date of the new AD, clarification is required regarding the compliance time for engine replacement specified in Table 2 (e.g., replacement within 35 FC after crack detection less than or equal to 3.0 mm). If a crack (less than or equal to 3.0 mm) was detected during a Revision 6 inspection prior to the effective date of the new AD, strictly applying the compliance time of "within 35 FC from the initial detection date" could result in immediate non-compliance or an AOG (Aircraft On Ground) situation upon the new AD's effective date. Our understanding is that for engines with cracks previously detected under Revision 6, their operational disposition will be re-evaluated using Revision 7 criteria during the first inspection scheduled after the new AD's effective date (in accordance with the interval determined under Revision 6), and the compliance limit (e.g., 35 FC) would apply from that subsequent inspection. We request EASA to clarify this interpretation in the final AD or its accompanying commentary.
- C. In EASA AD 2025-0206R1, a "Serviceable Part" included "an affected part that is new (never previously installed)." However, this phrasing has been removed from the definition in PAD 26-114.
Could EASA please clarify the rationale behind this removal?
Furthermore, we understand that for engines removed for reasons other than HPT blade cracking, the installation conditions of affected parts are not restricted by PAD 26-114 beyond its specified scope. Please confirm whether this understanding is correct.

EASA response:

- A. Comment noted. Paragraph (1) of the proposed AD already explicitly accounts for inspections performed in accordance with Revision 6 by requiring the next inspection "not exceeding 50 FC since last inspection of the affected parts in accordance with the instructions of Rolls-Royce"**



Alert NMSB TRENT 1000 72-AK316 up to Revision 6 (inclusive)." Therefore, inspections accomplished in accordance with Revision 6 are already recognized for compliance purposes and establish the reference point for the subsequent inspection interval. In addition, all follow-on inspections and corrective actions introduced by the proposed AD are dependent on the findings identified during inspections conducted in accordance with NMSB TRENT 1000 72-AK316 Revision 7 procedures after the effective date of the AD. The proposed requirements do not appear to require retrospective reassessment of Revision 6 inspection findings. Consequently, a separate credit paragraph may be redundant and could unnecessarily duplicate the intent already captured in paragraph (1).

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

- B.** *Paragraph (1) of the proposed AD already establishes how inspections accomplished in accordance with Rolls-Royce Alert NMSB TRENT 1000 72-AK316 up to Revision 6 are treated by requiring the next inspection within 50 FC since the last inspection accomplished under Revision 6. The intent of the proposed AD is not understood to retrospectively apply the compliance times of Table 2 to findings identified during inspections accomplished prior to the AD effective date under Revision 6. Rather, the proposed AD requires subsequent inspections in accordance with Revision 7 and specifies the associated follow-on actions based on the findings and crack classifications obtained during those inspections. Paragraphs (3) through (7) consistently link the required corrective actions and compliance times to cracks "detected" during inspections required by the AD. Consequently, we do not see a risk of creating an unintended immediate non-compliance or AOG situation solely as a consequence of inspections accomplished under Revision 6 before the AD effective date. A separate clarification or additional credit provision therefore does not appear necessary.*

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

- C.** *Comment noted. Engines currently operating with HPT blades P/N KH64485 are not rendered unairworthy solely because those blades are excluded from the definition of a serviceable part. However, the purpose of the definition of a serviceable part in this AD is not to determine the continued airworthiness of parts already installed and operating in service. Rather, it is used to define the configuration that is acceptable for installation when replacement of affected parts becomes necessary following crack detection or other corrective actions required by this AD.*

In this context, the definition ensures that, whenever replacement is required under paragraphs (4), (5), or (7) of this AD, only the improved post-modification blade standards introduced through SB TRENT 1000 72-K335 or SB TRENT 1000 72-L088 are installed. The continued operation of engines equipped with pre-mod blades remains permitted, provided they comply with the inspection and corrective-action requirements of this AD. Additionally, it is confirmed from Rolls Royce that Rolls-Royce will no longer release engines fitted with HPT blades P/N KH64485, as the remaining stock has now been used. The effect of the AD is therefore to remove the option of deliberately re-installing pre-Phase 1 blades.

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

