Special Condition on ‘Non-rechargeable Lithium Battery Installations’

Applicable to Large Aeroplane category

Introductory note:

The following Special Condition has been classified as an important Special Condition and as such shall be subject to public consultation, in accordance with EASA Management Board decision 02/04 dated 30 March 2004, Article 3 (2.) of which states:

"2. Deviations from the applicable airworthiness codes, environmental protection certification specifications and/or acceptable means of compliance with Part 21, as well as important special conditions and equivalent safety findings, shall be submitted to the panel of experts and be subject to a public consultation of at least 3 weeks, except if they have been previously agreed and published in the Official Publication of the Agency. The final decision shall be published in the Official Publication of the Agency."

Statement of Issue:

Applicants propose to install electrical components containing non-rechargeable lithium batteries.

Recent experience (reference FAA Airworthiness Directives 2013-15-07 and 2013-18-09) has shown that non-rechargeable lithium batteries and battery systems have certain failure, operational, and maintenance characteristics that can present hazards that are not adequately identified and addressed through traditional compliance methods. The EASA is considering development of new or revised standards to address the previously unforeseen hazards associated with non-rechargeable lithium batteries and battery systems.

As the proposed installation is a novel and unusual design feature, the applicable airworthiness codes JAR/CS 25 do not provide standards or specific guidance material. The current requirements governing the installation of batteries in Large Aeroplanes are covered under (CS) 25.1353(c). Requirements from (CS) 25.1353(c) are essentially unchanged from initial JAR code and do not adequately address several failure, operational, and maintenance characteristics of Li-Batteries that could affect safety and reliability of those battery installations.

Recent events involving a non-rechargeable lithium battery system in emergency locator transmitter (ELT) installations have identified unanticipated failure modes associated with non-rechargeable lithium battery installations. These may include over-discharging, cell imbalance, external short circuit, internal short circuit, and flammability of cell components among other possibilities.

Non-rechargeable lithium batteries, in design and operation, are different than nickel-cadmium and lead-acid non-rechargeable batteries. While the non-rechargeable lithium battery concept is not itself novel, higher energy levels are being introduced into aircraft systems by adopting new chemical composition in various battery cell sizes and construction. Interconnection of these cells in battery packs introduces
failure modes that require unique design considerations, such as provisions for thermal management.

In addition to the ELT which was the subject of the referenced ADs, known uses of non-rechargeable lithium batteries and battery systems on aircraft include:

- Flight deck and avionics systems such as displays, global positioning systems, cockpit voice recorders, flight data recorders, underwater-locator-beacons, navigation computers, integrated avionics computers, satellite network/communication systems, communication management units, and remote monitor electronic line replaceable units (LRU);
- Cabin safety, entertainment and communications equipment including life rafts, escape slides, seat belt air bags, cabin management systems, Ethernet switches, routers and media servers, wireless systems, internet/in-flight entertainment systems, satellite televisions, remotes and handsets;
- Systems in cargo areas including door controls, sensors, video surveillance equipment and security systems.

Some known potential hazards and failure modes associated with non-rechargeable lithium batteries and battery systems are described below.

**Internal Failures**
In general, lithium batteries are significantly more susceptible to internal failures that can result in self-sustaining increases in temperature and pressure (i.e., thermal runaway) than their nickel-cadmium or lead-acid counterparts. The metallic lithium can ignite, resulting in a self-sustaining fire and/or explosion.

**Fast-discharging**
An imbalanced discharge of one cell of a multi-cell non-rechargeable lithium battery system may create an overheating condition that results in an uncontrollable venting condition, which in turn could lead to a thermal event and/or an explosion.

**Flammability**
Unlike nickel-cadmium and lead-acid batteries, lithium batteries and battery systems use higher energy and current in an electrochemical system that can be configured to maximize energy storage of lithium and use liquid electrolytes that can be extremely flammable. The electrolyte, as well as the electrodes, can serve as a source of fuel for an external fire if there is a breach of the battery case.

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The intent of this Special Condition is to ensure that these non-rechargeable Lithium battery installations are not unsafe, to an extent necessary to support issuance of an airworthiness certificate.
In lieu of the requirements of CS 25.1353(c) (1) through (c)(4), non-rechargeable lithium batteries and battery installations must comply with the following special conditions:

1. Be designed so that safe cell temperatures and pressures are maintained under all foreseeable operating conditions to preclude fire and explosion.

2. Be designed to preclude the occurrence of self-sustaining, uncontrolled increases in temperature or pressure.

3. Not emit explosive or toxic gases in normal operation, or as a result of its failure, that may accumulate in hazardous quantities within the airplane.

4. Must meet the requirements of CS 25.863(a) through (d).

5. Not damage surrounding structure or adjacent systems, equipment or electrical wiring of the airplane from corrosive fluids or gases that may escape and that may cause a major or more severe failure condition.

6. Have provisions to prevent any hazardous effect on airplane structure or essential systems caused by the maximum amount of heat it can generate due to any failure of it or its individual cells.

7. Be capable of automatically controlling the discharge rate of each cell to prevent overheating, back charging, charge imbalance, and uncontrollable temperature and pressure.

8. Have a means to be automatically disconnected from its discharging circuit in the event of an over-temperature condition, cell failure or battery failure.

9. Have a means to detect its failure and alert the flight crew in case its failure affects safe operation of the aircraft.

10. Have a means for the flight crew or maintenance personnel to determine the battery charge state if its function is required for safe operation of the airplane.

Note 1: A battery system consists of the battery and any protective, monitoring and alerting circuitry or hardware inside or outside of the battery. It also includes vents (where necessary) and packaging. For the purpose of this special condition, a battery and battery system are referred to as a battery.

Note 2: These special conditions apply to all non-rechargeable lithium battery installations in lieu of 25.1353(c)(1) through (c)(4). Section 25.1353(c)(1) through (c)(4) will remain in effect for other battery installations.

Note 3: For Very Small Non-rechargeable Lithium Batteries (equal or less than 2 Watt-hour of energy), an acceptable Means of Compliance with this Special Condition is
showing these batteries compliant with Underwriters Laboratories (UL) 1642 or UL 2054.

Note 4: For the purpose of SCs 7 and 8, “safe operation of the airplane” is defined as continued safe flight and landing following failures or other non-normal conditions. The following are examples of devices with batteries that are not required for continued safe flight and landing of the airplane: emergency locator transmitters, underwater locator beacons, seat belt air bag initiators and flashlights. A backup flight instrument with a non-rechargeable lithium battery is an example that would be required for safe operation of the airplane.