

Comment				Comment summary	Suggested resolution	Comment is an observation or is a suggestion*	Comment is substantive or is an objection**	EASA comment disposition	EASA response
NR	Author	Section, table, figure	Page						
1	Dave Edward P. JANDUSAY			<p>If I may as an individual Contributor, could also ask if the proposed RCT is protected externally from the aircraft and internally from the cabin.</p> <p>For the latter, it may be pragmatic to take into consideration the event of 11 Dec 1994 on which a bomb detonated onboard an aircraft and tore a hole on the cabin floor.</p> <p>Indeed, the design consideration is that the integration of a center tanks cannot be avoided entirely, hence it is essential that there are sufficient protections in place.</p>				Noted	The protection of the RCT area from a bomb explosion is covered by the requirement 25.795(c)(2). Also the RCT doesn't introduce a new risk compared to the center wing box fuel tank that exists on most large aircraft.
2	Mildred Troegeler Director, Global Regulatory Strategy, The Boeing Company			<p>Fuel tanks integral to the airframe structure inherently provide less redundancy than structurally separate fuel tanks. Such integral fuel tanks located within the fuselage volume can foreseeably result in more hazardous outcomes when exposed to threats such as an external pool-fed fire.</p>	<p>The special condition should also consider the possibility of tank internal volume heating from the external pool-fed fire threat resulting in explosion or ignition of flammable vapors, as heat transfer characteristics will be affected by the absence of a conventional configuration featuring insulation against the fuselage external skin, and the potential presence of fuel in direct contact with the fuselage external skin.</p>			Agreed	<p>The protection of the RCT against an external pool-fire resulting in explosion or ignition of flammable vapors due to heat transfer will be covered by a separate Special Condition.</p> <p>The text of the proposed Special Condition has not been changed based on this comment.</p>
3	Mildred Troegeler Director, Global Regulatory Strategy, The Boeing Company	Identification of Issue, Item 2)	2	<p>Boeing notes there are additional concerns presented by integral fuel tanks located within the fuselage volume due to threats other than the external pool-fed fire 25.865(b) is to protect against. The location of such an integral fuel tank immediately aft of the main landing gear presents the most extensive range of threats to be considered. EASA states the following in the reference SC Item 2) of the “Identification of Issue”:</p> <p><i>2) The integration of a fuselage integral fuel tank located behind the wheel bay, under the passenger cabin, brings additional risks (explosion, penetration by fire, vapor migration, etc) if it is exposed to an external fire. While the other risks are addressed separately, this proposed Special Condition intend to address the risk of penetration by fire only.</i></p> <p>Boeing is concerned about other risks as identified in this paragraph. The inclusion of an auxiliary fuel tank integral to the fuselage presents many potential hazards, particularly the protection against structural disruption due to an otherwise survivable off-runway or landing gear failure event. Many of these hazards have been addressed in the past per the advisory material in FAA Advisory Circular (AC) 25-8 or other equivalent guidance.</p>	<p>The Boeing recommendation is to ensure that means of compliance advisory material be documented that provides an equivalent level of safety for an integral fuselage fuel tank to the level of safety provided by the advisory material in FAA Advisory Circular 25-8.</p>			Agreed	<p>The RCT design is being thoroughly reviewed with regards structural crashworthiness, taking into consideration the level of safety provided by the FAA AC25-8. Appropriate means of compliance will be defined.</p> <p>The text of the proposed Special Condition has not been changed based on this comment.</p>

* Please complete this column using the word “yes” or “no”; “yes” should be used when the commenter aims to provide an observation or a suggestion for improvement (with no clear objection).

** Please complete this column using the word “yes” or “no”; “yes” should be used when the commenter disagrees with the proposed text and wishes to propose a change.