

# Diamond MRO muudatustaotluse analüüs

Analüüsi eesmärk on hinnata Diamond MRO muudatustaotluse (delta ref: 13.5-5/24/12262-1) ja sellega kaasnevate tööriistade analüüside (delta ref: 13.5-5/24/12262-24) sisu. Hindamaks, kas organisatsioonil planeeritavad tööülesanded on vastavuses 145.A.10 liinihoolduse mõistega.

Komisjoni Määrus (EL) 1321/2014 Lisa II (osa-145) 145.A.10 Reguleerimisala ja AMC AMC1 145.A.10 Scope

## 145.A.10 Reguleerimisala

Käesolevas alajaos on sätestatud nõuded, millele organisatsioon peab vastama, et saada õhusõidukite ja komponentide hooldusorganisatsiooni sertifikaat või et selle kehtivust pikendataks.

AMC 145.A.40(a) Equipment and tools (ED Decision 2022/011/R)

### LINE MAINTENANCE AND BASE MAINTENANCE

(a) *'Line maintenance' refers to limited maintenance for the aircraft suitable to be carried out whilst the aircraft remains in the air operation environment.*

*Line maintenance may include:*

- *trouble shooting;*
- *defect rectification;*
- *component replacement with use of external test equipment if required. Component replacement may include components such as engines and propellers;*
- *maintenance that will detect obvious unsatisfactory conditions/discrepancies/malfunctions, but does not require extensive in-depth inspection. It may also include internal structure, systems and powerplant items which are visible through quick opening access panels/doors/ports;*
- *repairs, modifications and other maintenance tasks which do not require extensive disassembly and can be accomplished by simple means.*

(b) *'Base maintenance' refers to any maintenance for the aircraft other than line maintenance.*

(c) *Organisations maintaining aircraft should have a procedure to determine whether the tasks or groups of tasks to be carried out fall under the line maintenance or base maintenance scope of the organisation, with due regard to the expected duration of the maintenance, number and type of tasks, shifts and disciplines involved, work environment, etc.*

*For temporary or occasional cases, the organisation may also have a procedure which allows, subject to a task assessment (including all relevant aspects and conditions), to conduct a base maintenance task under line maintenance environment.*

(d) *In particular, maintenance tasks of aircraft subject to 'progressive' or 'equalised' maintenance programmes should be individually assessed in respect of such procedure to ensure that all the tasks within the particular check can be carried out safely and to the required standards at the designated line maintenance station.*

TRAM poolne analüüs põhineb Diamond MRO poolt esitatud tööriistade analüüsi dokumentidel:

- A320 CEO\_NEO Scope Analyses (2)
- 737 NG Scope Analyses (2)

Tööriistade analüüsi dokumentides on välja toodud järgnev põhimõtteline info

- Tööülesanne
- Kas tegu on keeruka tööülesandega (A320 ja 737CL näitel) TRAM arvestab seda et keerukas tööülesanne = baashooldus
- Kas tegu on liinihooldusega (737NG)

TRAM’I poolne analüüs koosneb kolmest peamisest osast:

1. Ülevaade analüüsist ja selle aluseks olevatest dokumentidest ja nõuetest.
2. Näited liinihooldusena tuvastatud tööülesannetest, mis ei ole kooskõlas AMC 145.A.10 põhimõtetega.
3. TRAM analüüsi tulemus

# Näited liinihooldusena tuvastatud tööülesannetest, mis ei ole kooskõlas AMC 145.A.10 põhimõtetega.

A320 CEO\_NEO hindamisel on välja toodud välja tööülesanne **AMM TASK 57-21-00-200-006-A** hinnates seda liinihoolduse ulatusse kuuluvaks ülesandeks.

| Item | INTERVAL                                 | PARENT ITE | AMM REF            | BRIEF MATTER  | TOOL REQ | STAFF REQ | FACILITY REQ | TASK | COMPLEX TAS | PARTS/CONSUMABLES | FREQUENTLY USED TOOLS |
|------|--|------------|--------------------|---|----------|-----------|--------------|------|-------------|-------------------|-----------------------|
| 153  | 12 YE<br>OR<br>3200 FC<br>OR<br>13700 FH | 522        | 57-21-00-200-006-A | Detailed Inspection of Outer Wing, Front Spar Forward Face, between Rib 8 and Rib 22, including all Cutouts | Y        | 81        | N            | DVI  | N           | N                 | N                     |

| R | TASK NUMBER | ZONE | DESCRIPTION   | ST/SI/T/I  | SOURCE              | REFERENCE              | M.H.         | APPLICABILITY  |
|---|-------------|------|---|--|---------------------|------------------------|--------------|--|
|   | 572101-01-1 | 522  | OUTER WING FRT SPAR FWD FACE RIB 8-22 AF DET<br>622 DETAILED INSPECTION OF OUTER WING, FRONT SPAR FORWARD FACE, BETWEEN RIB 8 AND RIB 22, INCLUDING ALL CUTOUTS | S: 12 YE<br>T: OR<br>43000 F<br>C<br>OR<br>86000 F<br>H<br>T: 24 YE<br>OR<br>43000 F<br>C<br>OR<br>86000 F<br>H<br>SI: 12 YE<br>OR<br>15000 F<br>C<br>OR<br>30000 F<br>H<br>I: 12 YE<br>OR<br>15000 F<br>C<br>OR<br>30000 F<br>H | ALI<br>MRB CPC<br>P | AMT 572100-200<br>-006 | 0.75<br>0.75 | A319-PAX<br>CLASSIC WING<br>OR<br>A320<br>CLASSIC WING |

ACCESS:  
 522AB 522CB 522EB 522FB  
 522HB 522JB 522KB 522LB  
 522NB 522QB  
 622AB 622CB 622EB 622FB  
 622HB 622JB 622KB 622LB  
 622NB 622QB

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Tööülesande täitmiseks vajalik eemaldada kokku 20 paneeli (parema ja vasaku tiiva alumisel osal)

Tegemist on paneelidega, mille eemaldamiseks on vajalik suure hulga kruvide välja võtmine ning tagasi paigaldamisel suure hulga kruvide tagasi panek korrektse momendiga ja aerodünaamilise hermeetiku kasutamine (Paneelide eemaldamise ja paigaldamise tööülesanded on välja toodud AMM 57-41-37) . Arvestades suurt paneelide hulka ja eemaldamise ja paigaldamise keerukust ei ole TRAM'i hinnangul tegemist kiiresti avatavate paneelidega (quick opening access panels/doors/ports)

B737-CL Hindamisel on näha et tööülesanne **Interval 1C - Z55-706-01-Z – Vertical stabilizer inspection** – MPD kohaselt on vajalik avada sabas vertikaalsel stabilisaatoril 19 paneeli.

B737CL MPD „C“ check definitsioon - "*C*" (*Periodic Check*) requires a greater depth of inspection throughout the airplane to ensure continued airworthiness. This task involves selected Operational/Functional Checks and requires removal of access doors and panels, etc., to facilitate the inspection. If performing Block Checks, performance of the "*C*" Check also requires accomplishment of all items in the lesser checks unless they are obviously redundant.

Tegemist on paneelidega, mille eemaldamiseks on vajalik suure hulga kruvide välja võtmine ning tagasi paigaldamisel suure hulga kruvide tagasi panek korrektse momendiga ja aerodünaamilise hermeetiku kasutamine Arvestades suurt paneelide hulka ja eemaldamise ja paigaldamise keerukust ei ole TRAM'i hinnangul tegemist kiiresti avatavate paneelidega (quick opening access panels/doors/ports)

## B737 NG

Tööülesanded 55-616-05, ja 55-616-06 Horisontaalse stabilisaatori esimese tala inspeksioonid, vajalik *leading edge* eemaldamine

| Item   | Interval | Parent IT | AMM/MPD REF | BRIEF MATTER   | TOOL REQ | STAFF REQ | FACILITY REQ | TASK  | LINE/BASE | PARTS/CONSUMABLES | FREQUENTLY USED TOOLS |
|--------|----------|-----------|-------------|--|----------|-----------|--------------|-------|-----------|-------------------|-----------------------|
| 18 318 | 6000 FC  |           | 54-640-00   | Strut Attach Bolts (Forward and Aft Mounts)                  | N        | B1        | N            | DVI   | L         | N                 |                       |
| 19 319 | 6000 FC  |           | 55-607-00   | Horizontal Stabilizer Center Section Jackscrew Fitting       | N        | B1        | N            | DVI   | L         | N                 |                       |
| 20 320 | 6000 FC  |           | 55-616-05   | Horizontal Stabilizer Front Spar Upper Chord - Web Flange    | N        | B1        | N            | DVI   | L         | N                 |                       |
| 21 321 | 6000 FC  |           | 55-616-06   | Horizontal Stabilizer Front Spar Upper Chord - Web Flange    | N        | B1        | N            | DVI   | L         | N                 |                       |
| 22 322 | 6000 FC  |           | 55-616-09   | Horizontal Stabilizer Front Spar Upper Chord - Web Flange    | N        | B1        | N            | DVI   | L         | N                 |                       |
| 23 323 | 6000 FC  |           | 55-616-10   | Horizontal Stabilizer Front Spar Upper Chord, Forward Flange | N        | B1        | N            | DVI   | L         | N                 |                       |
| 24 324 | 6000 FC  |           | 55-616-12   | Horizontal Stabilizer Front Spar Upper Chord - Web Flange    | N        | B1        | N            | DVI   | L         | N                 |                       |
| .. ..  | .. ..    | .. ..     | .. ..       | .. ..  | .. ..    | .. ..     | .. ..        | .. .. | .. ..     | .. ..             | .. ..                 |

737 NG MPD toob välja, et horisontaalse stabilisaatori esimese tala „*Horizontal Stabilizer Front Spar Upper Chord - Web Flange*“ inspeksioonideks on vajalik eemaldada stabilisaatori esimesed osad „*leading edge removal is required*“

|    |           |              |   |                          |                      |          |         |     |     |      |   |
|----|-----------|--------------|---|--------------------------|----------------------|----------|---------|-----|-----|------|---|
| 98 | 55-616-05 | 55-05-02-250 | F | 331<br>332<br>341<br>342 | 331B<br>341B<br>NOTE | 56000 FC | 6000 FC | ALL | ALL | 4,00 | INTERNAL - SPECIAL DETAILED: Horizontal Stabilizer Front Spar Upper Chord - Web Flange<br>Inspect (Low Frequency Eddy Current) the front spar upper chord web flange from stabilizer STA 75.0 to Stab Sta 175.5, except at web splice, stabilizer STA 111.1.<br>See Doc. D626A001 - DTR, DTR check form 55-10-06-4C, for alternative inspection.<br>The NDI method(s) necessary to accomplish the intent of this inspection is contained in the 737 Nondestructive Test Manual (D6-37239). The inspection procedures are contained in Part 6, Subject 55-10-66.<br><br>ACCESS NOTE: Removal of the Leading Edge is required for inspection access.  |
| 99 | 55-616-06 | 55-05-02-250 | F | 331<br>332<br>341<br>342 | 331B<br>341B<br>NOTE | 56000 FC | 6000 FC | ALL | ALL | 2,80 | INTERNAL - SPECIAL DETAILED: Horizontal Stabilizer Front Spar Upper Chord - Web Flange<br>Inspect (High Frequency Eddy Current) the front spar upper chord web flange from stabilizer STA 75.0 to Stab Sta 175.5, except at web splice, stabilizer STA 111.1.<br>See Doc. D626A001 - DTR, DTR check form 55-10-06-4C, for alternative inspection.<br>The NDI method(s) necessary to accomplish the intent of this inspection is contained in the 737 Nondestructive Test Manual (D6-37239). The inspection procedures are contained in Part 6, Subject 55-10-66.<br><br>ACCESS NOTE: Removal of the Leading Edge is required for inspection access. |
|    | 55-616-07 | 55-05-02-250 | F | 334                      | 334B                 | 56000 FC | 6000 FC | ALL | ALL | 4,10 | INTERNAL - SPECIAL DETAILED: Horizontal Stabilizer Front  |

Diamond MRO hinnangul on antud tegevus liinihoolduse ulatuses ning ei vaja angaari, tööriistu ega vahendeid.

TRAM ei nõustu sellise hinnanguga kuna horisontaalse stabilisaatori *Leading Edge* eemaldamine tähendab suure hulga kruvide eemaldamist ning hilisemat tagasipanekut. Lisaks paljudele kruvidele on vaja ohutult eemaldada ning tagasi panna võrdlemisi suur ja rakse *leading edge*.

# Kokkuvõte

TRAMI analüüs tugineti Diamond MRO poolt tehtud tööriistade analüüsidele:

- A320 CEO\_NEO Scope Analyses (2)
- B737CL Scope Analyses
- B737NG Scope Analyses

Käesolevas TRAM'i poolses analüüsisis on välja toodud näited tööülesannetest mis ei ole TRAMI hinnangul ei vastavuses liinihoolduse definitsiooniga.

TRAM'i poolt tehtud analüüsi tulemusena on näha, et ei ole võimalik rahuldada Diamond MRO taotlust (delta ref: 13.5-5/24/12262-1)

**A320, B737NG ja B737CL muudatuste osas.**

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