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B-H300-03-JGD-029

U.S. Department of Transportation
Docket Management System
Docket No. FAA-2002-13458
Room Plaza 401
400 Seventh Street, SW.
Washington, DC 20590-0001



Subject: Comments to Docket FAA-2002-13458, Notice of Proposed Rulemaking (NPRM) Notice No. 02-16, "Corrosion Prevention and Control Program"

Reference: NPRM published in the Federal Register on October 3, 2002 (67 FR 62142)

Dear Sirs:

Boeing Commercial Airplanes has reviewed the subject NPRM, "Corrosion Prevention and Control Program." Our comments are contained in the enclosure. We generally support the proposed rule, but have identified several areas where changes could be made for clarity and for consistency with established requirements of previously issued regulations.

Please direct any comments or questions to Ms. Jill DeMarco of this office at (425) 965-2015.

Sincerely,

A handwritten signature in black ink that reads "Jim Draxler".

for Jim Draxler
Director, Airplane Certification and
Regulatory Affairs

Enclosure

**Boeing Commercial Airplanes
Comments on
NPRM Notice 02-11, Docket FAA-2002-13458,
“Corrosion Prevention and Control Program”**

GENERAL COMMENTS:

In 1988, one of the issues that the Airworthiness Assurance Working Group (AAWG) identified as a gap in the airworthiness system of transport category airplanes was the lack of a structured maintenance program for the prevention and control of corrosion. The industry made a determination that the general condition of airplanes in operation at various airlines lacked a common approach for the prevention and control of corrosion. As a result, the AAWG set standards and developed programs for corrosion prevention and control programs (CPCP) for the eleven pre-amendment 45 under its tasking. Those programs were subsequently mandated by Airworthiness Directive (AD) action by the FAA and other regulatory bodies.

The issuance of this NPRM (Docket FAA-2002-13458) represents a means to bring the CPCP programs to all airplanes operated under 14 CFR Parts 121, 129, and 135.

COMMENTS ON THE PREAMBLE

Comment #1: In the “Regulatory Impact” section of the preamble, the last paragraph of the subsection titled “Description of Benefits” (page 62149, bottom of the third column) reads as follows:

“The Boeing 737 lap splice design originally required a good bond for load transfer. Environmental degradation caused the bond to deteriorate to the point where all of the load transfer ended up transferred through the fasteners, which were never designed to take that load.”

Boeing strongly disagrees that the fasteners were never designed to take the load of a dis-bonded joint. Boeing requests that the phrase “which were never designed to take the load” be removed from the sentence because it is not technically accurate.

Comment #2: *Editorial comment:* On page 62149, middle column, first sentence of the last paragraph, the word “charity” should be corrected to “clarity.”

COMMENTS ON THE PROPOSED RULE TEXT

§21.376, §129.35, and §135.424 “Corrosion prevention and control program”

Comment #1: Proposed paragraph (a) of each of these sections reads as follows:

(a) After [insert a date two years after the effective date of the final rule], no certificate holder may operate an airplane unless a corrosion prevention and control program (CPCP) is included in the operator’s FAA-approved maintenance program.

The proposed paragraph (a) would specifically require each operator to incorporate an FAA-approved CPCP into its maintenance or inspection program within two years after the effective date of the final rule. The FAA-accepted CPCP programs for Boeing models are documented and provided to the airlines in one of the following methods:

- ▶ As a separate document.
- ▶ In Section 10 and/or Appendix G of the Maintenance Planning Document (MPD).
- ▶ Incorporated into the MRB/MPD maintenance programs developed using MSG-3, Revision 2 or later guidance material.

Boeing requests that the FAA revise the rule text to state that established accepted programs are a means of compliance with this proposed rule.

Comment #2: Proposed paragraph (c) of each of these sections reads as follows:

(c) For airplanes that have exceeded the implementation threshold for a specific area prior to [insert date two years after the effective date of the final rule], the CPCP must include an implementation schedule that will result in the completion of all corrosion prevention and control tasks for that area no later than [insert date four years after the effective date of the final rule].

The proposed rule contains a provision for areas that have exceeded their implementation thresholds prior to two years after the effective date of the final rule. This provision would require the operator to develop an implementation schedule that would result in the completion of all overdue corrosion prevention and control tasks no later than four years after the effective date of the final rule.

Boeing considers that the four-year window may be too short to schedule all overdue CPCP tasks in an operator’s fleet. We therefore request that the FAA revise the rule to provide an implementation similar to the AD-mandated CPCP programs, which allow the operator to use the established repeat interval for the first inspection for any task where the implementation threshold has been exceeded.

§121.376a, §129.24, §135.426 “Level 1 corrosion definition”

The text in each of these sections reads as follows:

For the purposes of this part, Level 1 Corrosion is:

(a) Corrosion damage occurring between successive inspections that is local and can be re-worked/blended-out within allowable limits as defined by the manufacturer or as approved by the FAA;

(b) Corrosion damage that is local but exceeds allowable limits and can be attributed to an event not typical of the operator’s usage of other airplanes in the same fleet; or

(c) Corrosion damage that operator experience over several years has demonstrated to be only light corrosion between successive prior inspections but that the latest inspection shows that cumulative blend-outs now exceed allowable limits as defined by the manufacturer or as approved by the FAA.

Boeing, as well as the AAWG, considers that the definition iterated in paragraph (a) provides a situation that may not be achievable during the first inspection of a specific task. To alleviate this, Boeing requests that the FAA change the definition to read as follows:

*(a) Corrosion damage ~~occurring between successive inspections~~ **found during the first or subsequent inspections** that is local and can be re-worked/blended-out within allowable limits as defined by the manufacturer or as approved by the FAA; **or***

Further, Boeing requests that the following definition be inserted between the existing (a) and (b) definitions for consistency with current definitions in use today:

(b) Corrosion damage found during the first or subsequent inspections that is widespread and can be re-worked/blended-out well below allowable limits as defined by the manufacturer or as approved by the FAA;

OTHER COMMENTS

- The proposed rule should be revised to allow operators operating under Parts 121, 129, and 135 to supersede existing CPCP ADs by complying with the proposed rule. Boeing considers this change warranted in that it would prevent a number of operators having to demonstrate compliance with two different regulations.
- The proposed rule, as written, does not address parked or stored airplanes. The CPCPs mandated by ADs have provisions for parked airplanes. Boeing requests that similar provisions be added to the proposed rule.