

Certification of maintenance

With respect to blend out repairs, is it required to record the depth and area dimensions of material removed during a blend out repair or is it sufficient to simply record that the damage has been repaired as per the SRM?

Answer

Yes, the dimensions of the damage and the removed/remaining material should be recorded. This is a very important information in order to assess whether further damage (adjacent or at the same spot) at a later stage would be allowable or not. In addition, it is a safeguard measure in order to be able to determine, during audits, whether the person correctly determined that the damage was within limits.

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Can the subcontractor of a Part-145 or Part-CAO organisation release maintenance?

Answer

One of the fundamentals of subcontracting activities is that, during such maintenance, the Part-145 approval is extended to include the subcontractor activities. Subcontracting can be done only if the Part-145 has approved procedures to do it (145.A.75(b)) and the MOE is amended to reflect this new subcontractor.

A certificate of release to service can be issued by a person from the subcontractor who has received a certification authorisation from the Part-145 organisation in accordance with the certification authorisation procedure of the MOE including the assessment of competence.

The certificate of release to service and the EASA Form 1 will always be issued under the maintenance organisation approval reference.

For maintenance by Part-CAO the situation is different. Only 'specialised services' (e.g. NDT) can be subcontracted to another organisation, in accordance with the appropriate procedure

set out in the CAE and approved by the competent authority (CAO.A.095(a)(2)). In accordance with AMC1 CAO.A.025 the procedure should be part of chapter B.7 'Subcontracting'.

A certificate of release to service can be issued by a person from the other organisation who has received a certification authorisation from the CAO in accordance with the certification authorisation procedure of the CAE.

The certificate of release to service will always be issued under the CAO approval reference.

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Release to service of NDT tasks by Part-145 or Part-CAO organisations

Answer

This answer is separated in two tables. One table is for organisation holding a Part-145 approval and the second table is for organisations holding a Part-CAO approval.

Part-145:

Part-145	Certifying staff required	Qualification system	General Release procedure	Release procedure for an NDT
organisation				inspection
Aircraft				A Part-145
(class A)				organisation holding
				an A approval rating
				on a particular aircraft
				type and having in its
				approved scope of
				work NDT inspections
				for this aircraft type.
				This organization
				needs to have part-66
				certifying staff and
	The release of the aircraft maintenance			NDT personnel
				qualified in
				accordance with

carried out under A class rating has to be performed by certifying staff holding a Part-66 licence. (B1 or B3 or C or L certifying staff under the organisation's A rating.)

Licencing of personnel has to follow Part-66 regulation.

on the aircraft technical log or issuing an aircraft release to service statement.

The release is either

In this case the NDT inspector performs the NDT task and signs off the work order. The aircraft is released by appropriately qualified B1, B3, C or L certifying staff under the organisation's A rating.

145.A.30(f).

Please note that the release may include not only the NDT task but also the associated tasks (removal of panels, blankets, wires, reinstallation, etc), or the NDT task may be part of a base maintenance check.

Page 4 of 12 The certifying staff A Part-145 Engines is qualified organisation holding a Class B following the B rating approval on a procedures particular engine type established by the and having in its organisation in approved scope of compliance with work NDT inspections the competent for this engine type. authority The release of works This organization requirements. Partperformed under needs to have 66 licence is not class B is done on an "engine" certifying The release of required. EASA Form 1 (or by staff (qualified in the engine means of an internal accordance with maintenance release document company procedures) carried out when this component and NDT personnel under B class is for the qualified in rating has to be accordance with organisation's own performed by 145.A.30(f). use and the engine's organisation has in In this case the NDT certifying staff. place the related inspector performs the internal procedures NDT task and signs in the MOE). off the work order. The engine certifying staff releases the works performed to the engine (including NDT inspection) on an EASA Form 1.

Page 5 of 12 A Part-145 Components organisation holding a Class C C rating approval on a particular component and having in its approved scope of The release of works work NDT inspections The certifying staff performed under for this component. is qualified The release of class C is done on an This organization following the the component EASA Form 1 (or by needs to have CCS procedures maintenance means of an internal and NDT personnel established by the carried out release document qualified in organisation in under C class when this component accordance with compliance with rating has to be is for the 145.A.30(f). the competent performed by organisation's own authority In this case the NDT components use and the requirements. The inspector performs the certifying staff organisation has in CCS is not NDT task and signs place the related (CCS). required to have a off the Work Order / internal procedures Part-66 licence. Engineering Order. in the MOE). The CCS releases the works performed to the component (including NDT inspection) on an EASA Form 1.

Specialised services	The release of the maintenance carried out under D1 class rating has to be performed by "specialised services" certifying staff.	The certifying staff is qualified following the procedures established by the organisation in compliance with EN4179, Part-66 licence is not required.	The release of works performed under class D1 rating is done on an EASA Form 1 or using another form of release to service (other than aircraft release to service) as defined by the organisation in the MOE in compliance with 145.A.50 and approved by the	A Part-145 organisation holding a D1 approval on a particular NDT method. The approved scope of work will be NDT inspections on this method. This organisation needs to have NDT certifying staff qualified in accordance with 145.A.30(f). In this case the NDT certifying staff performs and releases the NDT task on an EASA Form 1 or using another form of
Noto: In a	the maintenance carried out under D1 class rating has to be performed by "specialised services" certifying staff.	is qualified following the procedures established by the organisation in compliance with EN4179, Part-66 licence is not required.	Form 1 or using another form of release to service (other than aircraft release to service) as defined by the organisation in the MOE in compliance with 145.A.50 and approved by the competent authority.	certifying staff qualified in accordance with 145.A.30(f). In this case the NDT certifying staff performs and releases the NDT task on an EASA Form 1 or using

Note: In case of non-EU organisations approved by the EASA in accordance with Part-145, the Part-66 licence could be read as "Part-66 or national licence in accordance with Part-145 Appendix IV"

Part-CAO:

panels, blankets, wires, re-installation, etc), or

Part-145 Certifying staff organisation required Aircraft (class aeroplanes, helicopter, airships, balloons or sailplanes)	Qualification system	General Release procedure	Release procedure for an NDT inspection A Part-CAO organisation holding an aeroplanes, helicopter, airships, balloons or sailplanes particular aircraft type or and having in its approved scope of work NDT inspections for this
The release of the aircraft maintenance carried out under A class rating has to be performed by certifying staff holding a Part-66 licence.	Licencing of personnel has	The release is either on the aircraft technical log or issuing an aircraft release to service statement.	aircraft type. This organization needs to have part-66 certifying staff and NDT personnel qualified in accordance with CAO.A.035(f). In this case the NDT inspector performs the NDT task and signs off the work order. The aircraft is released by appropriately qualified B1, B3 or L certifying staff under the organisation's aeroplanes, helicopter, airships, balloons or sailplanes rating. Please note that the release may include not only the NDT task but also the associated tasks (removal of

the NDT task may be $\,^{\rm Page~8~of~12}$ part of a base maintenance check.

The certifying Engines or staff is qualified Components following the other than procedures complete established by engines the Class

Components organisation, Part-66 licence is not required.

> The release of the engine maintenance carried out under components class rating has to be performed by 'engine's' or 'components other than complete engines' certifying staff.

The release of works performed under class components is done on an EASA Form 1 (or by means in accordance with of an internal release document when this component is for the organisation's own use and the organisation has in inspector performs the place the related internal procedures in the CAE).

A Part-CAO organisation holding a components rating approval on a particular engine type or 'components other than complete engines' and having in its approved scope of work NDT inspections for this engine type.

This organization needs to have "engine" or 'components other than complete engines' certifying staff (qualified company procedures) and NDT personnel qualified in accordance with CAO.A.035(f). In this case the NDT

NDT task and signs off the work order. The engine or 'components other than complete engines' certifying staff releases the works performed to the engine or 'components other than complete engines' (including NDT inspection) on an EASA Form 1.

The release of the component maintenance carried out under C class rating has to be performed by components certifying staff (CCS).

The certifying staff is qualified following the procedures established by the organisation in compliance with the competent authority requirements. The CCS is not required to have a Part-66 licence.

The release of works performed under class C is This organization needs done on an EASA Form 1 (or by means of an internal personnel qualified in release document when this component is for the organisation's own use and the organisation has in place the related internal procedures in the MOE).

A Part-145 organisation holding a C rating approval on a particular component and having in its approved scope of work NDT inspections for this component.

to have CCS and NDT accordance with 145.A.30(f).

In this case the NDT inspector performs the NDT task and signs off the Work Order / Engineering Order. The CCS releases the works performed to the component (including NDT inspection) on an EASA Form 1.

A Part-CAO organisation

Specialised services

the

under

The release of works The release of performed under class The certifying 'Specialised Services' maintenance staff is qualified rating is done on an EASA carried out following the Form 1 or using another procedures form of release to service 'Specialised (other than aircraft release established by Services' the organisation to service) as defined by class rating the organisation in the CAE certifying staff performs in compliance has to be with EN4179. in compliance with performed by Part-66 licence CAO.A.070(a) and "specialised approved by the competent or using another form of is not required. services" authority (AMC1 certifying staff. CAO.A.070 (a)(1)).

holding a 'Specialised Services' approval on a particular NDT method. The approved scope of work will be NDT inspections on this method. This organisation needs to have NDT certifying staff qualified in accordance with CAO.A.035(f). In this case the NDT and releases the NDT task on an EASA Form 1 release to service (other than aircraft release to service) as defined by the organisation in the CAE in compliance with CAO.A.070 and approved by the competent authority.

Note: In case of non-EU organisations approved by the EASA in accordance with Part-145, the Part-66 licence could be read as "Part-66 or national licence in accordance with Part-145 Appendix IV"

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