

NATIONAL AIR DISASTER ALLIANCE/FOUNDATION

2020 Pennsylvania Ave. NW #315 – Washington DC 20006

(888) 444 – 6232 phone (336)643 – 1394 – fax

www.PlaneSafe.org

To: Boeing, President, Chairman of the Board and Board Members

From: Matt Ziemkiewicz, President
Gail A. Dunham, Executive Director

Date: April 28, 2008

Subject: Safety requests

The *NATIONAL AIR DISASTER ALLIANCE/FOUNDATION* was founded in 1995 by air crash survivors and victims' family members. *NADAF* represents family members, aviation professionals, and the traveling public.

We have two safety requests today that will help Boeing and the airline industry to survive and prosper.

Request that SIX-INCH CRACKS in the fuselage skin of Boeing 737's NOT be acceptable.

NADAF members attended the House Transportation Hearings on April 3, 2008, and I am sharing with you Testimony submitted by Presidents of Southwest Airlines, that stated Boeing said **CRACKS UP TO SIX INCHES LONG** in the fuselage skin of the 737's were **NOT** a safety of flight issue. As you can see in the handout, Gregory Felth represented Boeing with this safety opinion.

A Whistleblower at the Hearing said, **"A phone call to Boeing should never be considered compliance with Airworthiness Directives. AD's are 'written in blood.'"**

- On behalf of the traveling public, and everyone who flies, we ask Boeing to advise the FAA that you want **FULL** compliance with Airworthiness Directives (AD's) and oversight to ensure that airlines are in full compliance.
- We encourage you that Boeing requires that 737's are **NOT** flying with cracks up to six inches long on the exterior of the aircraft.

Thank you for putting the first Boeing 737 with Inerting technology into service February 2008. We understand that all 737's will be coming off the assembly line with inerting summer 2008. We implore Boeing to complete certification so that 777, 747, and all new Boeing aircraft are equipped with FUEL TANK INERTING. We also ask Boeing to retrofit existing aircraft to prevent center wing fuel tank explosions such as TWA 800, in 1996, Thai Airlines in 2001, and other flights.

- December 1963, over 45 years ago, a government CAB report stated that it was imperative to remove flammable fuel/air mixture from the fuel tanks of transport category aircraft.
- Early 1980's, 25+ years ago, Boeing studied fuel-tank problems in one of your jumbo jets.
- December 2003 FAA reported that they found a way to implement inerting on commercial aircraft that was inexpensive and much lighter in weight than prior methods.
- The NTSB and FAA continued to push for inerting, and made many directives, however, inerting is the only technology that will 100% prevent fuel tank explosions.

When people board a Boeing commercial plane today, and there is no inerting system on the aircraft, the plane is **NOT** the safest possible aircraft. The technology is there, it is affordable and lightweight, and long overdue for Boeing to please get the job done. TWA, the airline corporation, did not survive after that preventable explosion over 10 years ago. A safer plane will be more profitable and keep the airlines in business.

Last year you referred us to Boeing's Director of Product Integrity & Technical Excellence, your safety expert, and he has been very helpful and seems eager to get the job done. However, Boeing needs a corporate culture that promotes the improved technology as a higher level priority for newly build Boeing aircraft, and retrofit aircraft in service.

We also ask that you tell the FAA, your employee John Hickey, and the OMB (Office of Management and Budget) that Boeing is moving forward on inerting **NOW** and request the Rule-making to be fast-tracked. This recent Rule-making has been ongoing since Nov. 2005 and long overdue. The corporate responsibility is yours. We ask that you move forward inerting technology for your most important **TRUE** customer – the traveling public.

Please tell us know **NOW** about your new aggressive timeline to put inerting in Boeing aircraft. Thank you.



Gregory A. Feith, LLC.
15849 Allendale Place
Golden, Colorado 80403

Denver Office: 303-279-6096 Washington, D.C. Office: 301-990-8849 Fax: 303-279-5925 Email: crashdetective@man.com

Safety of Flight Assessment

I was requested by Southwest Airlines (SWA) to review and assess the potential safety of flight risk that could have resulted from the continued in-service operation of 46 of their Classic 737 airplanes in March 2007 as they progressively inspected a small area (under 0.6%) of the fuselage skin as required by FAA Airworthiness Directive 2004-18-06. The assessment involved the review of technical documents associated with both mandatory and non-mandatory inspections, pertinent service/maintenance history for the 46 airplanes, a technical briefing by the Southwest Airlines Engineering Department and technical data/analysis provided by Boeing (the airplane manufacturer) related to structural integrity of fuselage skin cracks that were found on five of the 46 SWA airplanes. The scope of the assessment was confined to the safety of flight issues only.

Based on the information I have reviewed, it is apparent that on March 15, 2007, SWA initiated re-inspection of the affected airplanes to accomplish the inadvertently missed portion of FAA Airworthiness Directive (AD) 2004-18-06. A review of the historical information that led to the issuance of the AD indicates that a progressive inspection for fuselage skin cracking was initially distributed to operators in the form of a "non-mandatory" Service Bulletin (SB) that provided "risk mitigation" actions that operators were encouraged to incorporate into their maintenance program. This Service Bulletin was based, in large part, on an inspection program developed by Southwest Airlines. The issuance of the AD was a continued effort to ensure that cracks in the fuselage skin on the Boeing 737 airplanes was identified and mitigated well before they could pose a safety of flight issue. It is evident from the 4500 hour initial inspection requirement (regardless of aircraft age (i.e. flight cycles)) that the FAA did not regard the skin cracking as an "immediate threat" to the safety of flight of the airplane. Thus, the FAA Airworthiness Directive permitted aircraft to remain in-service for approximately 1½ years, until a normally scheduled heavy maintenance visit occurred, before the first inspection was required.

In addition, it is evident from the analysis and testing data developed by Boeing that cracks up to 6 inches in the fuselage skin do not compromise the structural integrity or pose a safety of flight issue. This is further supported by the design of the fuselage structure which incorporates "internal reinforcing doublers in the skin assembly" and "tearstraps", both of which are intended to provide strength, and slow or abate the growth rate of a crack under normal operating aerodynamic loads.

Based on the available data and information reviewed, it is apparent that there was no risk to the flying public in March 2007 while Southwest Airlines performed their program to re-inspect the small area of aircraft fuselages identified in the AD inspection that was inadvertently missed.

737 Classic Fuselage Skins

(22 March 2008)

Commercial airplane structure prior to FAA Amendment 25-45 was certified under the design requirement known as 'fail-safe'. Fail-safe structure provides the ability to fly and land safely with significantly large structural damage. Fail-safe design features provide protection against unanticipated, inadvertent damage and maintenance errors that airplanes may encounter in their service life. Fail-safe designs provide inherent robustness in the event of significant structural damage from several possible sources. Sources include fatigue damage, environmental deterioration (corrosion), accidental damage, maintenance errors, manufacturing flaws, and discrete events such as engine burst and impact damage.

Experience has shown that fail-safe design produces structure with a credible safety record. Numerous in-service incidents have demonstrated the ability of Boeing airplanes to fly and land safely with significant structural damage. Fail-safe design provides multiple load paths and damage containment. Generic fail-safe features can be summarized into the following categories:

- Alternate/intermediate/adjacent members that pick up load from failed members
- Fastener capability matched to load redistribution requirements
- Damage containment features, such as fuselage tear straps
- Boundaries of components and subcomponents, such as major joints or heavy frames
- Appropriate operating stress levels
- Material toughness and elongation characteristics

The specific requirements of 14 CFR Part 25, Section 25.571, Amendment 25-0 addressing fail-safe strength states the following: "It must be shown by analysis, tests, or both, that catastrophic failure or excessive deformation, that could adversely affect the flight characteristics of the airplane, are not probable after fatigue or obvious partial failure of a single principal structural element. After these types of failure of a single principal structural element, the remaining structure must be able to withstand static loads corresponding to..."

All fuselage primary flight-loaded structure must be designed to be fail-safe, that is, with sufficient residual strength to carry limit load with failure or partial failure of a principal structural element. This requires that the structure have multiple elements and/or redundant load paths and have adequate damage containment capability for a period of unrepaired use. Limit load conditions must consider tension, compression, shear, internal pressure, combinations of these loads, and, if appropriate, the presence of an active crack, in determining the residual strength.

Fail-safe design concepts should provide for visual damage detection by minimizing hidden critical details. Directed inspections are not considered within the scope of fail safety but are commonly applied to fail-safe structure in situations where fatigue or corrosion have been documented to occur either in-service or in test.

Fail safety has traditionally been achieved by providing multiple load paths and damage containment features with built-up structure. Multiple load path structure is defined as "redundant structure in which (with the failure of individual members) the applied loads would be safely redistributed to other load carrying members." In addition to the inherent load redistribution capability, built-up structure has other benefits related to fail safety:

- Multiple levels of fail safety are provided by allowing intermediate failures before reaching the maximum assumed fail safe damage size.
- A high level of resistance to unanticipated damage sources is provided by having separate members. If damage is initiated in one member, there is typically a significant period of unrepaired use before similar damage is initiated in adjacent members.
- Separate parts and mechanical joints provide boundaries for crack growth, tending to contain a crack in one member for a period of time before damage progresses to an adjacent member.
- Fail-safe capability for adjacent members typically provides significant static margin for non-failed conditions and maintains appropriate stress levels for operating loads.

Damage containment occurs when damage growth is interrupted by encountering an external or internal boundary, or by encountering a reduced stress field which significantly discourages further growth. Included under damage containment is the concept of crack arrest, defined as the "arrest of dynamically extending cracks within a continuous medium". Crack arrest features ensure that unstable rapid crack propagation at any load level up to limit load will be stopped within a continuous area of the structure prior to exceeding the maximum allowable damage.

Fail-safe design as found in 737 Classic Fuselage Skin assemblies

The 737 Classic fuselage is designed to be fail-safe through the use of three separate load paths. Two of the load paths are contained in the skin assembly itself. These load paths are created by structurally bonding two independent layers of material together, the external skin and the internal bonded doubler. Typically, both the skin and doubler are .036 inch thick 2024 aluminum alloy. Fatigue and damage tolerance testing, and in-service experience have clearly demonstrated that this design is effective in containing typical damage and allowing continued safe flight until the damage is detected. This design is effective because when damage occurs in the primary layer (external skin) due to fatigue, corrosion or other causes; the fail-safe internal bonded doubler provides an alternate load path. In this situation, the fail-safe bonded doubler does two things: first it provides an alternate load path for the loads to redistribute load around the damage; and

second, it impedes the growth of the damage, containing it to a safe size until the damage can be discovered and repaired.

The third load path in the fail-safe design of the 737 fuselage is through the frames and stringers. Under normal conditions the frames and stringers share a portion of the load with the skins. When the skin is damaged, the frames and stringers are designed to allow some off-loading from the skin to occur to help redistribute the loads around the skin failure.

Fail-safety and Chem-mill Cracks

The bonded doubler, discussed above, is commonly referred to as a 'waffle doubler' due to its waffle-like pattern (see photo). This waffle pattern is achieved through a process known as "chemical milling" which chemically removes selected areas of the internal bonded doubler. This design feature is one of the critical advancements in aircraft design that allowed the 737 to become one of the most weight-efficient commercial airplanes ever developed. Below is a photograph of an airplane in heavy maintenance, and the skin assembly is clearly visible with the waffle doubler obviously seen between frames.



