

VOLUME 6 SURVEILLANCE**CHAPTER 9 PART 145 INSPECTIONS****Section 6 Safety Assurance System: Inspect a Repair Station's Record System**

6-1729 REPORTING SYSTEM(S). This section is related to Safety Assurance System (SAS) System 4 for repair stations inside or outside the United States.

6-1730 OBJECTIVE. This section guides the aviation safety inspector (ASI) in inspecting a maintenance records system required by Title 14 of the Code of Federal Regulations (14 CFR) parts 43 and 145.

6-1731 GENERAL. Repair station records include documenting maintenance and alteration of an aircraft or its parts. An agency must have its maintenance records inspected periodically to verify those records meet the requirements of the Repair Station Manual (RSM)/Quality Control Manual (QCM) procedures.

6-1732 COORDINATION REQUIREMENTS. If the repair station has an assigned principal maintenance inspector (PMI) and a principal avionics inspector (PAI), both inspectors should coordinate this inspection together.

6-1733 REFERENCES, FORMS, AND JOB AIDS.**A. References (current editions):**

- Title 14 CFR Part 43, Maintenance, Preventive Maintenance, Rebuilding, and Alteration.
- Title 14 CFR Part 145, Repair Stations.
- Advisory Circular (AC) 43.9-1, Instructions for Completion of FAA Form 337.
- AC 43-210, Standardized Procedures for Requesting Field Approval of Data, Major Alterations, and Repairs.
- AC 120-78, Acceptance and Use of Electronic Signatures, Electronic Recordkeeping Systems, and Electronic Manuals.
- AC 145-5, Repair Station Internal Evaluation Programs.
- AC 145-9, Guide for Developing and Evaluating Repair Station and Quality Control Manuals.
- Volume 2, Chapter 11, Section 1, Introduction.
- Volume 2, Chapter 11, Section 2, Procedures for Certificating Part 145 Repair Stations/Satellites Located within the United States and Its Territories.
- Volume 10, Safety Assurance System Policy and Procedures.
- FAA Order 8130.21, Procedures for Completion and Use of the Authorized Release Certificate, FAA Form 8130-3, Airworthiness Approval Tag.

B. Forms. Federal Aviation Administration (FAA) Form 8130-3, Authorized Release Certificate Airworthiness Approval Tag.

C. Job Aids. None.

6-1734 PROCEDURES.

A. Review Applicable Information. Before the inspection, the ASI or the principal inspector (PI) should carefully review:

- 1) Parts 43 and 145.
- 2) RSM/QCM for the description of the required records and the recordkeeping system used to obtain, store, and retrieve those records.
- 3) The Safety Performance Analysis System (SPAS).

NOTE: For additional information on SPAS data, see Volume 10 for SPAS reports available for review.

- 4) Enhanced Vital Information Database (eVID).
- 5) Certificate-holding district office (CHDO) file.

B. Review Required Records and Retention. The records must use the English language and repair stations must retain records for 2 years or longer. The repair station must provide a copy of the maintenance release to the owner/operator. If the repair station chooses to use FAA Form 8130-3 as a maintenance release, the records must include a copy of the completed form. The RSM procedures should describe who will review the records for accuracy and completeness before approval for return to service. The records retained by the repair station – required by part 145, § 145.219 – must indicate compliance with part 43 requirements. Repair stations must use a record system that clearly approves on both (1) the record given to the owner/operator, and (2) the record retained by the repair station, that the aircraft, engine, propeller, or article for return to service. The ASI must verify the certificate holder's records comply with the following:

- 1) The content must include:
 - a) A description of the maintenance performed,
 - b) The date the repair station completes the maintenance,
 - c) The name of the person performing the maintenance,
 - d) The signature or stamp (if a stamp system is used by a repair station), certificate number, and
 - e) The type of certificate of the person approving the maintenance for return to service.

NOTE: Part 43, § 43.9 describes the content, form, and disposition of maintenance, preventive maintenance, and alteration records.

- 2) Validate that procedures exist for:
 - a) Temporary removal of parts from type certificated (TC'd) products,
 - b) Establishing controls for parts permanently removed from TC'd products.
 - c) The transfer of life-limited parts are in place and adhered to.
- 3) Verify these procedures are in place and that the repair station has followed the procedures.

NOTE: Section 43.10 describes the disposition of life-limited aircraft parts.

- 4) Verify record entries in the appropriate aircraft maintenance record reflecting the type inspection performed, and the similarly-worded approval for return to service statement. Examples of types of inspections could include 100-hour, annual, progressive, or Approved Aircraft Inspection Program (AAIP).

NOTE: Section 43.11 describes the content, form, and disposition of maintenance records for inspections performed under 14 CFR parts 91, 125, and 135, §§ 135.411(a)(1) and 135.419.

- 5) The repair station should retain a record of all major repairs and alterations completed. These records should be part of any maintenance record retention system, as required by the regulation.

- a) The repair station may use either the customer's work order or FAA Form 337, Major Repair and Alteration (Airframe, Powerplant, Propeller, or Appliance), to record a major repair made per an FAA-approved manual or other approved data.

- b) The repair station must use FAA Form 337 to record major alterations. Verify the completion and routing of FAA Form 337 per the requirements in part 43 appendix B.

NOTE: Repair stations should document major repairs and alterations for air carriers in accordance with the air carrier's manual.

NOTE: Repair stations must use the current edition of AC 43-210 to prepare and process repair station major repairs/alterations requiring a field approval.

- 6) If the repair station performs maintenance per Designated Engineering Representative (DER)-approved technical data, check that a copy of FAA Form 8110-3, Statement of Compliance with Airworthiness Standards, is with the records package.

C. Check Personnel Rosters. Ensure repair stations keep a history of the required personnel roster, so the ASI can note added or removed personnel authorizations.

D. Verify Records Availability. Repair stations must make records available to the FAA and the National Transportation Safety Board (NTSB). The ASI should verify that the

repair station organizes the “records package” for easy retrieval. The ASI should also verify that the repair station complies with the procedures describing the records’ location and the system used to retrieve those records. The ASI must review procedures governing the storage and retrieval of records from remote storage sites for compliance.

E. Review Training Records. The repair station must retain all training records for 2 years. The training records must record both initial and recurrent training. If the repair station employs a person over the 2-year requirement, the person’s record of initial training may not be available for review, so the FAA recommends that the ASI encourage the repair station to retain a record of the employee’s initial training.

F. Check Electronic Records. If the CHDO approves an electronic recordkeeping system and the repair station uses one, the ASI should review the agency’s manual for relevant procedures and verify:

1) Procedures on record, to include:

a) Procedures making required records available to both the NTSB and FAA personnel. If the computer hardware and software system is not compatible with the FAA and NTSB systems, the organization must provide an employee or representative to assist. This employee must be familiar with the computer system and assist in accessing the necessary computerized information. This procedure and computer system must produce paper copies of the viewed information.

NOTE: The FAA and NTSB must be able to review the records and information at their respective offices when necessary and on request. Persons or entities can fulfill this request in many ways, such as with electronic or paper copies.

b) Procedures for reviewing the computerized personal identification codes system, and especially to verify that the system cannot duplicate passwords.

c) Procedures for auditing the computer system every 60 days to ensure system integrity. Make a record of the audit and retain it on file as part of the operator’s record retention requirements. This audit may be a computer program that automatically audits itself.

d) Audit procedures to verify the integrity of each computerized workstation. If server-based workstations contain no inherent features that enable or disable access, there is no need to audit each workstation.

e) Procedures describing the operator’s transmission to customers or another operator of computerized records, per regulatory requirements. The records may be either electronic or paper copies.

f) Procedures that verify records transferring with an aircraft are in a format, either electronic or paper, acceptable to a new owner/operator.

g) Guidelines for authorized representatives of the owner/operator to use electronic signatures and to have access to the appropriate records.

h) A description of the training procedure and requirements to authorize access to the computer hardware and software system. As details will vary with the different individuals who need access, the training description may simply be part of the position description. The RSM/QCM should reference its location.

2) Security, to include:

- a) Protection of confidential information.
- b) Prevention of unauthorized alterations of information.
- c) A corresponding policy and management structure to support the computer hardware and computer software supplying the information.

G. Check Air Carrier Procedures. If the repair station is performing maintenance for a certificate holder operating per 14 CFR parts 121, 125, 129, or 135, verify that the repair station maintenance records reflect the requirements found in the air carrier or air operator's manual. The forms and procedures may differ from those the repair station normally uses.

H. Verify Malfunction Defect Reporting. Verify that the repair station has submitted reports of failures, malfunctions, or defects to the CHDO within 96 hours of discovery and submitted them per RSM/QCM requirements.

6-1735 TASK OUTCOMES.

A. Complete the Task. Follow SAS guidance for Modules 4 and 5 for Data Collection, Data Reporting, and Data Review.

B. Analyze Findings. Follow SAS guidance for Module 5.

6-1736 FUTURE ACTIVITIES. Follow SAS Volume 10 to plan future risk-based surveillance in SAS.

RESERVED. Paragraphs 6-1737 through 6-1750.