Disposition of Public Comments
Policy Statement PS-ANM-25.1441-01, Mitigating Fire Hazards in Gaseous Oxygen Systems
Prepared by Robert Hettman, ANM-112

No.	Comment	Requested Change	Disposition
	Commenter: Airbus		
1.	It is AIRBUS understanding that with this policy no guidance is given for Liquid- or Chemical Oxygen Systems.	Airbus recommends that FAA should clarify this policies' applicability by adding some language in the summary (page 1) and in the policy section on page 3.	We clarified the summary to identify that the policy applies to typical gaseous oxygen system designs rather than stating what the policy does not pertain to.
2.	Taking into account the maturity of state-of-the-art analytical methods to determine ventilation rates, for Airbus it is not reasonable to verify each ventilation rate by an alternative method which was determined analytically.	Therefore §1.3 should be merged with §1.2. As a consequence the verification of ventilation rates by testing should only be requested if oxygen concentrations would reach unsafe levels.	The statement specifically requiring validation of analytically determined ventilation rates has been removed. Analytical methods are not unique for the issues discussed in this policy and should be approved through the normal certification process.
3.	Chp 3. Definition of High Pressure Oxygen Areas. In this chapter it is stated that "high-pressure oxygen is generally considered to be above 100 psi." However in the literature (see MIL-D-8683C) the A/C oxygen pressure term is defined as low-pressure up to 450 psig.	To avoid confusion we would like to propose to change the wording of "high pressure" in the policy.	We partially agree. MIL-D-8683 has been inactive for new design since 1997 so we do not consider it a current resource. However, this section has been clarified to describe "typical" system design and the need to evaluate components used to store high pressure oxygen, reduce the pressure, and control the flow.
4.	Section 4.1 states "....The hazard analysis should show compliance with § 25.1529 …" which is misleading. As stated in the chapter "Policy" the hazard analysis shall demonstrate compliance with § 25.1441(b). § 25.1529 "Instructions for Continued Airworthiness" is related to Maintenance Instructions or ALS but not directly to a hazard analysis.	FAA should add some language in chapter 4.1 to explain the direct request to show compliance with § 25.1529 by hazard analysis.	This section has been clarified. The hazard analysis and instructions for continued airworthiness should complement each other. We agree that the hazard analysis is not necessary for compliance to §25.1529.

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	Commenter: ANAC		
1.	The reason is that if ignition may occur, then it is already potential, right?	In section 1.2, the word "potential" should be removed from the sentence "The hazard analysis should identify locations where potential ignition may occur if the oxygen system leaks (…)".	We agree with the intent, however, this sentence was clarified in response to other comments and this requested change is no longer applicable.