# **Structural Analysis Substantiation**

#### **To Support**

#### **Modification Certification Efforts**

#### **James Burd**



- Structural Analysis Substantiation has been an integral part of Commercial Certification for a long time:
- <u>Air Bulletin 7A (1934)</u> "A stress analysis supplemented by test data if necessary, covering an investigation of all primary structural members for compliance with the requirements outlined in theses regulations".
- <u>CAR 04 (1937)</u> "Structural analyses will be accepted as complete proof of strength only in the case of structural arrangements for which experience has shown such analyses to be reliable".
- <u>CAR 4B.202 (1953)</u> "Proof of compliance by means of structural analysis shall be acceptable only when the structure conforms to types for which experience has shown such methods to be reliable."
- <u>FAR 25.307 (a)(Present)</u> "...Structural analysis may be used only if the structure conforms to that for which experience has shown this method to be reliable."



- Structural Analysis Substantiation has likewise been a requirement for certification of modifications of existing type designs. In addition, guidance by the Airworthiness Authorities has been :
- FAA AC 20-14 Section 5-3 Substantiating/Compliance Data

d. Structural analyses establish mathematically that the appropriate structural strength requirements have been met. These analyses build on the basic loads and material allowable data and may include: static stress, fatigue, fail safe, damage tolerance, etc. The applicant should assure that the <u>analytical methods and assumptions used are applicable</u>, that <u>all pertinent loading conditions have been addressed</u>, and that appropriate margins of safety have been shown for all structural elements.



- Modifications to certified aircraft/rotorcraft are a prominent part of the commercial aviation industry.
- Modifications are made to all certified types and for all types of reasons.
  - Presently Over 70,000 FAA Supplemental Type Certificates
  - STCs for Large Aircraft, Small Aircraft, Rotorcraft
  - STCs for Engines and Propellers
- Due to nature of many STC's, the structural substantiation can be extensive and sometimes difficult for the applicant to determine both the applicable approach and the extent required.
- Choice of substantiation method can have significant impact on schedule, cost and certification of STC.



- Some examples of STC's are
  - Increased GW
  - Antennas and Radomes
  - Special Mission
  - Cargo Doors
  - Winglets





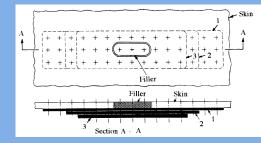


- Typical Methods of Substantiation:
  - Equivalent Strength
  - Finite Element Analysis
  - Industry Standard Methods



- Static Strength Substantiation
  - Analysis by Equivalent Strength
  - Pros:
    - Does Not Require External Loads
    - Does Not Require Internal Loads
    - Design is based on Equivalency
    - Usually Based only on Mech Props
    - Equiv. Sect Props & Materials
    - Limited Effort Required

• Cons:



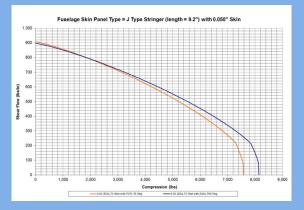
**Equivalent Area** 

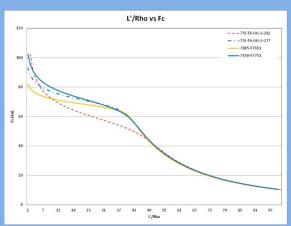
- Cannot account for load redistribution
- Difficult to account for structure reliant on combined allowables
- Difficult to address Non-linearities
- <sup>–</sup> Difficult to check all failure modes
- Results in heavy design

- Certification Limitations
  - Generally limited to Repairs
  - Can be used on modifications without major load redistribution
  - Cannot be used for Cargo Door or Large Cutout Modifications



- Static Strength Substantiation
  - Examples of Items Difficult to Address thru Equivalent Strength:
  - Example 1:
    - Skin & Stringer Panel Replacement
      - Different Stringer Shape
      - Different Skin Material
    - Panel Allowables generally based on post buckled behavior & test data
  - Example 2:
    - Beam Column Type Structure
    - Allowables based on Strain and Modulus
    - Simple Mechanical Properties Comparison is not Valid







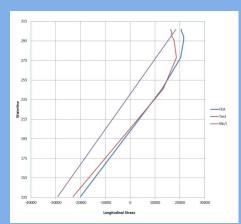
- Static Strength Substantiation
  - Substantiation by Finite Element Analysis
- Pros:
- Provides Detailed Internal Loads
- Can Provide Detail Stresses
- Accounts for Load Redistribution
- Provides Details Part Analysis
- Reduces Conservatism
- <sup>-</sup> Interfaces with CAD Design Models
- Can be Readily Modified
- Certification Limitations
  - Results Must be Validated
  - Results Must Correlate within 10% of Test Data
  - Complex Validation for Non-Linearity/Stress Models
- Linge Structure-Complete Aircraft Model

Full Airframe FEM

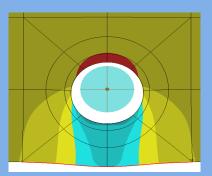


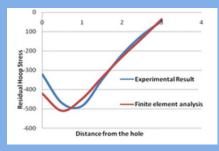
- Cons:
  - Requires External Aircraft Loads
  - Requires Substantial Dwg Data
  - Requires Validation/Test Data
- <sup>-</sup> Difficult to Handle Non-Linearity
- Stress Models Difficult to Correlate
- Must be Within 10% Correlation
- Time Consuming

- Static Strength Substantiation
  - Examples of Items Difficult to Address thru FEA:
  - Example 1:
    - Skin & Stringer Panel
      - FEM correlates well with test shear lag behavior
      - FEM does not conservatively predict compression due to panel post buckled properties behavior
  - Example 2:
    - Cold Working of Fastener Hole with Short Edge Distance
    - Amount of Interference, Contact, Non-Linearity all make this a Complex Analysis
    - Test Validation is Non-trivial



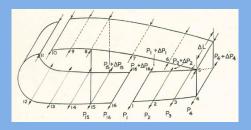








- Static Strength Substantiation
  - Substantiation by Industry Classical Methods



**Cozzone Unit Beam** 

- Pros:
  - <sup>-</sup> Large Number of Methods Available
  - Methods are Industry Accepted
  - Methods have been validated by test
  - Methods Support both Linear and Non-Linear Issues
- Certification Limitations
  - Accepted for Most Projects
  - Limited Acceptance for Large Cargo Door Modifications depending on approach

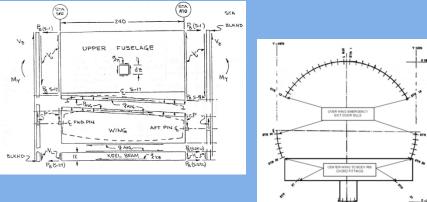
**ERONAUTICA** 

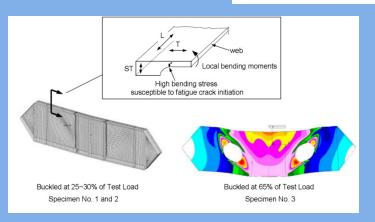
ACD Conference 2019 Atlanta, Georgia

Cons:

- Requires External Aircraft Loads
- Requires Basic Design Data
- Method Produces Conservative Results
- Limited Support for Large Load Redistribution Data
- Methods can be cumbersome if not automated

- Static Strength Substantiation
  - Examples of Items Difficult to Address thru Industry Classical Methods:
  - Example 1:
    - Center Wing / Fuselage Intersection at Side of Body Rib to Skin/Stringer Attach
      - Complex Loading
      - Large Stiffness Effects
      - Overlapping Assumptions are Required
  - Example 2:
    - Cutout in Floor Beam Web
    - Stresses in Post Buckled Web
    - Multiple Gradients
    - Very Few Standard Solutions Available







- Static Strength Substantiation Summary
- Structural Substantiation Must Meet Certification Requirements:
  - Must be Based on Approved Loads and Material Data
  - Must be Proven to Be Reliable
  - Must be Validated (ie Test)
- Applicant Should be Cautious in Selecting Substantiation Approach Based on the following:
  - Certification Requirements
  - Scope of Effort in Terms of Cost
  - Extent of Effort in Terms of Schedule
- Proper Selection of Substantiation Approach can Lead to both a Successful Approach as well as Meeting Project Goals



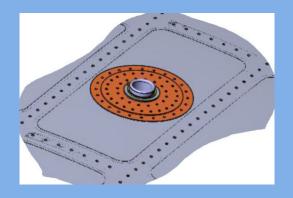
- Fatigue and Damage Tolerance (FDT) Substantiation
  - Several Types of Modifications can Directly or Indirectly Affect the Fatigue and Damage Tolerance Capabilities of the Basic Airframe
    - Direct Impacts:
      - Modifications that Hide Existing Inspection Areas
      - Modifications Creating New Critical Details
    - Indirect Impacts:
      - Modifications that Affect the External Loads of the Aircraft
      - Modifications to the Mission Usage of the Aircraft
  - Fatigue and Damage Tolerance Substantiations Include Various Methods – Two Examples Compared:
    - Simplified Once per Flight Stress Cycle (Ground-Air-Ground)
    - Flight by Flight Spectra



- FDT Substantiation Direct Impact Examples
  - Radome that covers fuselage skin from visual inspections
  - Antenna penetration thru fuselage skin with external doubler
  - Cabin Interior Equipment that attaches to fuselage frames and floor structure
  - Wing External Pod that attaches to spars and lower wing skin



- External Radome
- Covers Fuselage Crown
- Impacts Visual Inspection of Skin
- Alternate ICA Procedures Needed



- Feed-thru Doubler
  - Hole in Fuselage Skin
  - Doubler Covers the Fuselage Skin
  - New Structural Detail Needs Inspection



- Wing Sensor Pod
  - Adds Additional Aero Loads to Wing
  - Attaches to Spars and Wing Skin
  - Creates new Structural Details
  - Requires Multiple Additional Inspections



- FDT Substantiation Indirect Impact Examples
  - Increased Gross Weight Modification
  - Engine and/or Thrust Reverser Modification
  - Change to Mission Profiles and Usage



- TO GW Increase
- Longer time at MTO Thrust
- Increased Exposure to Sonic Loads
- Sonic Fatigue Life of Aft Structure Impacted
- Inspections and/or Life Limits in ICA must be revised

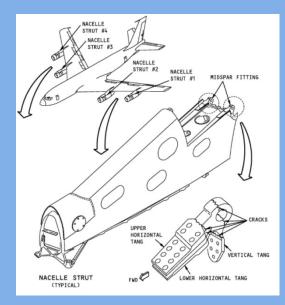


#### Mission Usage Change

- Increased Pilot Training
- Impact to Number of Landing Cycles
- Change to existing ICA required



ACD Conference 2019 Atlanta, Georgia



#### Hush Kit Mod

- Weight and CG Changes
- Changes Pylon Attach Loads
- Impact to Blueprint Midspar Fittings
- AMOC required due to existing AD

- FDT Substantiation Various Methods
  - Simplified Once per Flight (GAG) Stress Cycle Example
    - Based on Regulatory Guidance Material
    - Based Solely on Ftu Capability
    - Does Not Distinguish between Hours or Flights
    - Is Not Consistent with Usage Data

$$\sigma_{1G,max} = (F_{tu}/1.5 - \Delta PR/2t)/N_z$$

$$\stackrel{t = thickness = 0.063 inches}{Ftu = tension allowable = 63 ksi}$$

$$Delta P = fuselage pressure = 8.47 psi$$

$$Nz = 2.5g for Limit Maneuver$$

$$R = fuselage radius = 78 inches$$

$$\sigma_{1G,max} = 14703 psi$$

$$\sigma_{max} = \Delta PR/2t + 1.3\sigma_{1G,max}$$

$$\sigma_{max} = 24357 psi$$

$$\sigma_{max} = -13871 psi$$

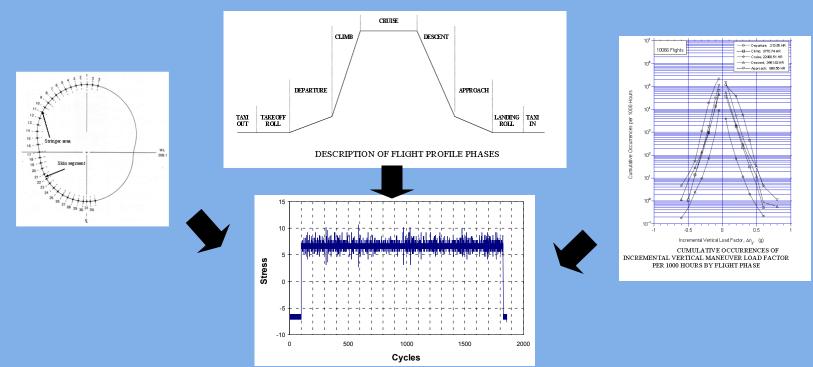
$$\sigma_{RES} = \Delta PR/2t + N_z\sigma_{1G,MAX} = 42 ksi$$
ACD Conference 2019
Atlente Coursis

Aliania, Georgia

- FDT Substantiation Various Methods
  - Flight by Flight Spectrum Example

NAUTICA

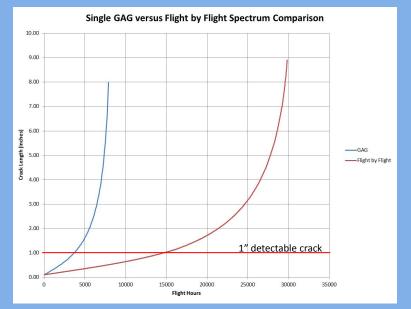
- Utilizes Specific Aircraft Usage Data
- Uses Aircraft Fatigue External and Internal Loads
- Accounts for Mission Profiles and Usage



ACD Conference 2019

Atlanta, Georgia

FDT Substantiation – Comparison
 – GAG versus Flight by Flight



– Inspection Threshold: GAG = 7800/2 = 3900 hours

**Retardation Not Possible** 

FBF = 29800/2 = 14,900 Hours with Retardation FBF = 39600/2 = 19,800 Hours

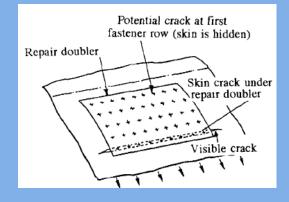
Inspection Interval for 1" crack:

GAG = (7800-3700)/2 = 2050 Hours Retardation Not Possible wi

FBF = (29800-14685)/2 = 7550 Hourswith Retardation FBF = (39600 - 19650)/2 = 9980 Hours

**ERONAUTICA** 

- FDT Substantiation Comparison
  - GAG versus Flight by Flight



- ICA Impact:
  - GAG Method: Eddy Current Buried Layer every 2050 Hours
  - FBF Method: Eddy Current Buried Layer every 9980 Hours

- GAG Limitations:
  - Based solely on material capability not aircraft size, configuration or type
  - Can only produce 1 Hour/ 1 Cycle Inspections
  - Does not address changes in usage
  - Unreliable for use in failure analysis in support of SBs and AMOCs
  - Overly conservative for some aircraft, typical for a few but also un-conservative for others
  - Produces costly and sometimes needless inspections

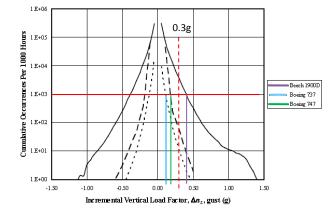


Figure A-122. Comparison of cumulative occurrences of incremental vertical gust load factor per 1000 hours, BE-1900D vs. B-737-400 and B-747-400 for cruise



#### • SUMMARY

Prior to Initiating an STC Modification Project, it is important to identify the path for structural substantiation which meets both certification and project schedule as well as cost requirements.

- Some Relevant Items to Review in Determining the Substantiation Method
  - Is this a One Time STC or Multiple STC?
  - Is this a Large Complex STC with impact to the basic airframe structural stiffness or load path?
  - Are there impacts or changes to the aircraft mission?
  - Is testing planned as part of the project?
  - Are there existing AD's in the area of the STC which require AMOCs?



