

偏差报告 Deviation Report

PR#: 6940

Deviation No.:D-2020-0357

Record Status: Closed-Done

基本信息 General Information

厂区 Division: Innovent Biologics (Su Zhou) Co., Ltd

发起人 Originator: 刘, 浩(PID-000045)

发起日期 Date Opened: 2020.11.23

简短描述 Short Description:

M1bDS1 DS2009016VF预过滤膜排气管路超期 The vent tubing of VF pre-filtration membrane is overdue

到期日期 Date Due: 2020.11.24

关闭日期 Date Closed: 2020.11.24

偏差信息 Deviation Information

发现人 Discovery By: 展卫钧20002301

发现日期 Discovery On: 2020.11.22

汇报人 Report By: 展卫钧20002301

汇报日期 Report On: 2020.11.22

发生部门 Occurred Department: M1b DS1

汇报部门 Report Department: M1b DS1

偏差描述 Deviation Description:

2020.11.22, M1b生产人员(20002301)审核(BPR100322)《信迪利单抗注射液M1b 3000L原液纯化批生产记录》DS2009016批次除病毒过滤步骤批记录时,发现除病毒过滤步骤7.3.2(page219)排气管路1,登记的清洗/灭菌批号:20201108-050,有效期至2020.11.19,除病毒过滤步骤实际操作日期是2020.11.20,是过期物料使用,与批记录要求使用有效期内物料的规定不符,开启偏差处理。

描述的附件 Description attachment:

是否及时上报? Reporting in Time?: Yes

未及时上报的理由 Reason for not in Time:

已采取的即时措施 Immediately Action Taken:

即时措施附件 Immediately Action Attachment:

厂房设施名称 Facility Name:

M1b

产品所属阶段 Product Phase:

Commercial

初步影响/风险评估 Initial Impact/Risk Assessment

产品影响评估 Product Impact Assessment:

2020.11.20生产人员(20000392、20000163)在26C15除病毒前纯化间进行IBI308 DS2009016批次《信迪利单抗注射液M1b 3000L原液纯化批生产记录》(BPR100322)7.3.2除病毒过滤-预过滤膜包平衡时,生产人员(20000392、20000163)登记排气管路1,清洗/灭菌批号:20201108-050,有效期至:2020.11.19,除病毒过滤实际操作日期是2020.11.20,排气管路1通过批记录确认为过期物料,且2020.11.20被使用于纳滤-预过滤膜包排气,除病毒过滤步骤已经完成。

1、灭菌有效期,根据M1b原液部件无菌保存时间研究验证方案(PQP00492),灭菌有效期是15天,实际计算有效期,直接在灭菌当天加14天,实际使用为第15天,仍在验证范围内,风险较低。

2、生产人员(20000392、20000163)在登记管路信息时,未能及时发现管路过期问题,复核人员也未能及时复核出问题,经过调查,生产人员(20000392、20000163)是具有除病毒过滤操作资质,并且拥有第二复核人资质的,所以第二复核人无效复核,是本次偏差发生的直接原因。

对产品的影响:排气管路1,只用于除病毒过滤-预过滤膜包的排气操作,且安装时有隔膜阀与预过滤膜包隔断,不与产品直接接触,整个排气过程为正压过程,对预过滤膜包微生物水平的没有影响,所以排气管路1对产品质量无影响。

生产/检测的影响评估 Production/Testing Impact Assessment:

对工艺的影响:排气管路1不对除病毒过滤过程有影响,对DS2009016批次后续工艺无影响。对生产的影响:对整个生产没有影响,同时不影响其他批次的生产。

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其他影响评估描述 Other Impact Assessment Description:
NA

初步影响评估附件 Initial Impact Assessment Attachment:

偏差分级 Deviation Classification

偏差严重性 Deviation Severity:

灭菌有效期是根据M1b原液部件无菌保存时间研究验证方案（PQP00492）制定，灭菌有效期是15天，实际计算有效期，直接在灭菌当天加14天，实际使用为第15天，仍在验证范围内，风险较低。

对产品的影响：排气管路1，只用于除病毒过滤-预过滤膜包的排气操作，且安装时有隔膜阀与预过滤膜包隔断，不与产品直接接触，整个排气过程为正压过程，对预过滤膜包微生物水平没有影响，本偏差对产品质量无影响。

偏差发生率 Reoccurrence Probability of Deviation:

过去12个月内未发生类似偏差。（关键词：VF，排气管路，有效期）

偏差分级 Deviation Classification: Minor

分级的理由 Reason for Classification:

11/24/2020 08:14 AM (GMT+8:00) added by 晓军 吴 (PID-000095):

本偏差原因明确，对产品质量没有影响，因此定义为次要偏差。

是否需要调查？ Investigation Required?: No

主调查人 Lead investigator:

不需要调查的理由 Reason for not Investigation:

本偏差原因明确，对产品质量和后续生产没有影响，因此无需进行进一步调查。

调查总结&根本原因分析 Investigation & RCA

调查总结 Investigation Summary:

调查附件 Investigation Attachments:

根本原因分析 Root Cause Analysis:

生产人员（20000392、20000163）在登记管路信息时，未能及时发现管路过期问题，复核人员也未能及时复核出问题，经过调查，生产人员（20000392、20000163）是具有除病毒过滤操作资质，并且拥有第二复核人资质的，所以第二复核人无效复核，是本次偏差发生的直接原因。

根本原因分析附件 Root Cause Analysis Attachment:

原因描述 Cause Description:

生产人员（20000392、20000163）在登记管路信息时，未能及时发现管路过期问题，复核人员也未能及时复核出问题，经过调查，生产人员（20000392、20000163）是具有除病毒过滤操作资质，并且拥有第二复核人资质的，所以第二复核人无效复核，是本次偏差发生的直接原因。

原因分类 Cause Category

Others

原因子分类 Cause Sub-Category

Others

原因归属部门 Cause Department

M1b DS1

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缺陷描述 Defect Description:

2020.11.22 , M1b生产人员 (20002301) 审核 (BPR100322) 《信迪利单抗注射液M1b 3000L原液纯化批生产记录》DS2009016批次除病毒过滤步骤批记录时,发现除病毒过滤步骤7.3.2 (page219) 排气管路1,登记的清洗/灭菌批号: 20201108-050,有效期2020.11.19,除病毒过滤步骤实际操作日期是2020.11.20,是过期物料使用,与批记录要求使用有效期内物料的规定不符,开启偏差处理。

缺陷类型分类 Defect Category
Others

缺陷类型子分类 Defect Sub-Category
Human execution error

缺陷描述 Defect Description:

2020.11.22 , M1b生产人员 (20002301) 审核 (BPR100322) 《信迪利单抗注射液M1b 3000L原液纯化批生产记录》DS2009016批次除病毒过滤步骤批记录时,发现除病毒过滤步骤7.3.2 (page219) 排气管路1,登记的清洗/灭菌批号: 20201108-050,有效期2020.11.19,除病毒过滤步骤实际操作日期是2020.11.20,是过期物料使用,与批记录要求使用有效期内物料的规定不符,开启偏差处理。

缺陷类型分类 Defect Category
Production/Process

缺陷类型子分类 Defect Sub-Category
Operation

是否是重复偏差 Repeat Deviation?: No

判定重复偏差的原因 Justification for Repeat Deviation:

本偏差不做根本原因调查,因此不是重复偏差。

重复偏差的原因描述 Reason of Repeat Deviation Description:

相关的重复偏差 Repeat Deviation Records

PR#	deviation#	简短描述 Short Description	Record Status

最终影响/风险评估 Final Impact/Risk Assessment

对产品质量的影响 Impact on Product Quality:

对其他批次的影响 Impact on Other Batches:

对系统/设备的影响 Impact on System/Equipment:

对验证状态的影响 Impact on Validation State:

对产品注册的影响 Impact on Product Registration:

对法规符合性的影响 Impact on Regulation Compliance:

对稳定性的影响 Impact on Stability:

对其他方面的影响 Impact on Other Aspects:

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受影响的部门 Impact Departments:

影响/风险评估附件 Impact/Risk Assessment Attachment:

受影响的产品信息 Impacted Product Information

产品最终处置建议 Product Disposition Proposal:

产品名称 Product Name:	信迪利单抗注射液M1b 3000L原液(商业化)		
产品代码 Product Code	产品批号 Batch No.:	数量 Quantity	处理决定 Disposition
DS30-308	DS2009016	3000L	

受影响的物料信息 Impacted Material Information

物料名称 Material Name:

物料代码 Product Code	批号 Batch No.:	数量 Quantity
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受影响的溶液信息 Impacted Media/Buffer Information

溶液名称 Media/Buffer Name:

溶液代码 Media/Buffer Code:	批号 Batch No.:	数量 Quantity:
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受影响的设备信息 Impacted Equipment Information

设备名称 Equipment Name:	设备代码 Equipment Code
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偏差处理措施 Deviation Action Items

PR#: 6946			
责任人 Assigned To: 刘, 浩(PID-000045)	部门 Department:	M1b DS1	
截止日期 Date Due: 2020.11.24	完成日期 Completed Date:	2020.11.24	
确认人 Verified By: 赵, 琰(PID-000065)	确认日期 Verified On:	2020.11.24	
行动项详细描述 Action Description: 对M1b纯化人员进行培训偏差D-2020-0357, DS2009016 VF预过滤膜排气管路超期, 在使用器具前确认器具是否在有效期内。			

纠正信息 Correction Information

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PR#:

责任人 Assigned To:

截止日期 Date Due:

确认人 Verified By:

行动项详细描述 Action Description:

部门 Department:

完成日期 Completed Date:

确认日期 Verified On:

纠正与预防措施 CAPA

PR#:

责任人 Assigned To:

截止日期 Date Due:

行动项详细描述 Action Description:

部门 Department:

附件 File Attachments

关联记录 Reference Records

PR#	Record Type	简短描述 Short Description	Record Status
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相关子记录 Related children

PR#	Record Type	简短描述 Short Description	Record Status
6946	Deviation Action Items	偏差D-2020-0357发起的CAPA CAPA from deviation D-2020-0357	Closed-Done

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Initial Approval

QA Initial Review

Area QA Initial Reviewed By:	赵, 琰	Area QA Initial Reviewed On:	2020.11.23 15:25
Classify Completed By:	吴, 晓军	Classify Completed On:	2020.11.24 08:22

Department Initial Review

Department Leader 1 Reviewed By:	康, 云	Department Leader 1 Reviewed On:	2020.11.24 10:31
Department Leader 2 Reviewed By:		Department Leader 2 Reviewed On:	
Department Leader 3 Reviewed By:		Department Leader 3 Reviewed On:	
Department Leader 4 Reviewed By:		Department Leader 4 Reviewed On:	
Department Leader 5 Reviewed By:		Department Leader 5 Reviewed On:	
Area QA Leader Reviewed By:	代, 圆圆	Area QA Leader Reviewed On:	2020.11.24 09:07

Quality Initial Approval

Quality Approver 1 Approved By:	管, 国兴	Quality Approver 1 Approved On:	2020.11.24 12:10
Quality Approver 2 Approved By:		Quality Approver 2 Approved On:	
Quality Approver 3 Approved By:		Quality Approver 3 Approved On:	

Final Approval

QA Final Review

QA Final Reviewed By:	QA Final Reviewed On:
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Investigator Final Review

QA Representative Reviewed By:	QA Representative Reviewed On:
Investigator 1 Reviewed By:	Investigator 1 Reviewed On:
Investigator 2 Reviewed By:	Investigator 2 Reviewed On:
Investigator 3 Reviewed By:	Investigator 3 Reviewed On:
Investigator 4 Reviewed By:	Investigator 4 Reviewed On:
Investigator 5 Reviewed By:	Investigator 5 Reviewed On:
Investigator 6 Reviewed By:	Investigator 6 Reviewed On:
Investigator 7 Reviewed By:	Investigator 7 Reviewed On:
Investigator 8 Reviewed By:	Investigator 8 Reviewed On:

Department Final Approval

Department Leader 1 Final Approved By:	Department Leader 1 Final Approved On:
Department Leader 2 Final Approved By:	Department Leader 2 Final Approved On:
Department Leader 3 Final Approved By:	Department Leader 3 Final Approved On:
Department Leader 4 Final Approved By:	Department Leader 4 Final Approved On:
Department Leader 5 Final Approved By:	Department Leader 5 Final Approved On:

Quality Final Approval

Quality Approver 1 Final Approved By:	Quality Approver 1 Final Approved On:
Quality Approver 2 Final Approved By:	Quality Approver 2 Final Approved On:

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Quality Approver 3 Final Approved By:

Quality Approver 3 Final Approved On:

Product Final Disposition

Disposition Proposed By:

Disposition Proposed On:

Proposal Reviewed By:

Proposal Reviewed On:

Product Disposition Approved By:

Product Disposition Approved On: