

PR#: 4771 Deviation No.:D-2020-0254

Record Status: Closed-Done

基本信息 General Information

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

发起人 Originator: 吴, 洪健(PID-000204) 发起日期 Date Opened: 2020.08.27

简短描述 Short Description:

M1b DS2物气锁自净时间不足M1b DS2 air lock self-cleaning time is insufficient

到期日期 Date Due: 2020.08.28 关闭日期 Date Closed: 2020.08.28

偏差信息 Deviation Information

发生部门 Occurred Department: M1b DS2 汇报部门 Report Department: M1b DS2

偏差描述 Deviation Description:

2020.08.26/11:00生产部员工(工号:20000789)发现物气锁25D06房间的《M1b物品转运清洁消毒记录》(SMP00286-R1,工作日志编号为220124)的第一页的倒数第二行的传递物品为标签,消毒/自净开始时间16:47,理论自净时间至17:07,物品取出时间为17:07,自净时间实际为20min,不足30min,具体见附件1,偏离《M1b生产区物品转运标准操作规程》(SMP00286/04)中要求的纸质文件自净需≥30min的要求,故发起偏差。

描述的附件 Description attachment: 附件1M1b物品转运清洁消毒记录.jpg

是否及时上报? Reporting in Time?: Yes

未及时上报的理由 Reason for not in Time:

NA

已采取的即时措施 Immediately Action Taken:

08/27/2020 10:31 AM (GMT+8:00) added by 洪健 吴 (PID-000204):

行动项内容:用75%乙醇对标签盒消毒

完成部门:生产部 贾鹏宇 完成日期:2020.08.26 11:15

即时措施附件 Immediately Action Attachment:

厂房设施名称 Facility Name: 产品所属阶段 Product Phase:

M1b Clinical

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

产品影响评估 Product Impact Assessment:

NΑ

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

NA

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

偏差调查:

该偏差从人员、设备、物料、方法、环境几个方面进行根本原因分析。

人员:

物品传入操作人(工号:20000808)和物品取出操作人(工号:20002692)已通过《M1b生产区物品转运标准操作规程》

(SMP00286)培训,具备上岗资质和操作条件(详见附件2);

经调查物品传入操作人当天传入标签时,记录消毒/自净开始时间16:47,通过心算,记录理论自净时间至17:07,物品取出操作人看到



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理论自净时间至17:07,等到17:07便记录物品取出时间17:07,未对标签自净时间进行计算是否≥30min,就直接在消毒/自净时间是否符合时长列勾选"是",然后从物气锁间(25D06)取出标签放置在细胞培养间25D08的标签盒中,从而导致标签物净时间<30min,发生偏差。

物品传入操作人通过心算得到计算理论自净时间至17:07,未采用计算器等工具计算,导致理论自净时间错误,同时物品取出操作人直接参考了理论自净时间至17:07,未对标签自净时间进行计算是否≥30min,就直接在消毒/自净时间是否符合时长列勾选"是",从而取出标签,是偏差发生的直接原因。

经调查物气锁间(25D06)没有放置计算器等工具,只能通过心算计算时间,因此物气锁间(25D06)没有放置计算器是导致偏差的根本原因。

设备:

本偏差不涉及设备。

物料:

本偏差不涉及物料。

方法:

《M1b物品转运清洁消毒记录》(SMP00286-R1)中有对于物品传入操作人的操作指导"进入C/D级的纸质文件不需要消毒,但需要在高级别缓冲间或警示线靠高级别一侧自净满30min以上,传递记录时无需使用清洁剂/消毒剂,勾选N/A"的描述;

对于物品取出操作人记录中设置有"消毒/自净时间是否符合时长"列的判断要求,具有复核作用,因此方法没有缺陷,不是造成偏差发生的原因。

环境:

本偏差不涉及环境。

调查复盘总结:

物品传入操作人通过心算得到计算理论自净时间至17:07,未采用计算器等工具计算,导致理论自净时间错误,同时物品取出操作人直接参考了理论自净时间至17:07,未对标签自净时间进行计算是否≥30min,就直接在消毒/自净时间是否符合时长列勾选"是",从而取出标签,是偏差发生的直接原因。

针对直接原因:通过对员工再次进行《M1b物品转运清洁消毒记录》(SMP00286-R1)和《良好记录规范规程》SMP00068文件培训,说明物品取出操作人需要计算实际自净时间后,才能在消毒/自净时间是否符合时长列判断勾选,避免发生类似偏差。

经调查物气锁间(25D06)没有放置计算器等工具,只能通过心算计算时间,因此物气锁间(25D06)没有放置计算器是导致偏差的根本原因。

针对根本原因:通过在M1b车间的气锁间放置计算器用于时间计算。

影响评估:

标签由CNC区域在2020.08.25 17:07从物气锁间(25D06)取出放置在D级区的细胞培养间25D08的标签盒中,在2020.08.26 11:15 采取及时措施用75%乙醇对标签盒消毒。标签自净时间不足可能会对细胞培养间(25D08)的标签盒环境造成影响,但采取及时措施用75%乙醇对标签盒消毒,可以减少自净时间不足对标签盒的影响,并且此标签是由CNC区域传入D级别区域,D级别区域对环境要求较低,传入自净时间20min的标签对D级别区域影响可控,此外,细胞培养阶段是密闭培养,细胞培养间(25D08)环境的轻微变化对细胞培养和产品质量无影响,风险可控,本偏差直接原因和根本原因已调查清晰,无需进一步调查。

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

附件2培训记录.docx

偏差分级 Deviation Classification

偏差严重性 Deviation Severity:

根据初步影响评估,对自净时间不足的标签,用75%乙醇对标签盒消毒,并且此标签是由CNC区域传入D级别区域,D级别区域对环境要求较低,传入自净时间20min的标签对D级别区域影响可控。此外,细胞培养阶段是密闭培养,细胞培养间(25D08)环境的轻微变化对细胞培养和产品质量无影响。综上,此次偏差对产品无影响。

偏差发生率 Reoccurrence Probability of Deviation:

过去12个月内有类似缺陷发生(搜索关键词:M1b、自净、不足),具体如下:

1.D-2019-0284: 2019.10.10 质量部现场QA在审核物流气闸间(26D06)的《M1b物品转运清洁消毒记录》

(SMP00286-R1/02)时,发现2019.10.05纸质文件传递时自净时间只有22分钟,不足30分钟。根本原因为:人员未按流程对进入C/D级区域的纸质文件进行自净。



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2.D-2020-0244:2020.08.18 生产部员工在物气锁(25D06)传递供应商(阿法拉伐)的笔记本电脑时,在填写完《M1b物品转运清洁消毒记录》(SMP00286-R1/04)时,发现笔记本电脑已被供应商工程师提前取出,且供应商工程师未填写《M1b物品转运清洁消毒记录》(SMP00286-R1/04)取出记录(含实际取出时间)。因该电脑为2020.08.18 10:37消毒结束开始自净,自净结束时间应在10:47之后,但因取出时间无法追溯,经询问供应商判断自净时间小于10min。该偏差根本原因在调查中。

偏差分级 Deviation Classification: Minor

分级的理由 Reason for Classification:

08/27/2020 06:10 PM (GMT+8:00) added by 伊婷 陈 (PID-000128):

基于初步影响评估,回顾过去12个月M1b区域有类似偏差,但该偏差对产品没有影响,风险可控,故定义为次要偏差。

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:

基于初步影响评估,回顾过去12个月M1b区域有类似偏差,但该偏差对产品没有影响,根本原因明确,并已根据根本原因制定行动项,风险可控,故不需要进一步调查。

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:

经调查物气锁间(25D06)没有放置计算器等工具,只能通过心算计算时间,因此物气锁间(25D06)没有放置计算器是导致偏差的根本原因。

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

原因描述 Cause Description:

经调查物气锁间(25D06)没有放置计算器等工具,只能通过心算计算时间,因此物气锁间(25D06)没有放置计算器是导致偏差

的根本原因。

原因分类 Cause Category 原因子分类 Cause Sub-Category 原因归属部门 Cause Department

Others Others M1b DS2

缺陷描述 Defect Description:

2020.08.26/11:00生产部员工(工号:20000789)发现物气锁25D06房间的《M1b物品转运清洁消毒记录》

(SMP00286-R1,工作日志编号为220124)的第一页的倒数第二行的传递物品为标签,消毒/自净开始时间16:47,理论自净时间至17:07,物品取出时间为17:07,自净时间实际为20min,不足30min,俱体见附件1,偏离《M1b生产区物品转运标准

操作规程》(SMP00286/04)中要求的纸质文件自净需≥30min的要求,故发起偏差。

缺陷类型分类 Defect Category 缺陷类型子分类 Defect Sub-Category

Production/Process Others

是否是重复偏差 Repeat Deviation?: No

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

过去12个月内在M1b DS区域有如下类似缺陷发生(搜索关键词: M1b、自净、不足):

1.D-2019-0284:2019.10.10 质量部现场QA在审核物流气闸间(26D06)的《M1b物品转运清洁消毒记录》

(SMP00286-R1/02)时,发现2019.10.05纸质文件传递时自净时间只有22分钟,不足30分钟。根本原因为:人员未按流程对进入6.76亿元,10.76亿元,

入C/D级区域的纸质文件进行自净,与该偏差根本原因不一致,非重复偏差。

2.D-2020-0244: 2020.08.18 生产部员工在物气锁(25D06)传递供应商(阿法拉伐)的笔记本电脑时,在填写完《M1b物品转运清洁



旧丛土物	היה היוו	Deviation Report	
PR#:	4771		Deviation No.:D-2020-0254
Record Status:	Closed-Done		
录》(SMP0028	6-R1/04)取出记录(含实际取出 同无法追溯,经询问供应商判断自》	电脑已被供应商工程师提前取出,且供应商工程师规时间)。因该电脑为2020.08.18 10:37消毒结束开始争时间小于10min。该偏差根本原因在调查中。	
重复偏差的原因抗	描述 Reason of Repeat Deviatior	n Description:	
相关的重复偏差 I PR#	Repeat Deviation Records deviation#	简短描述 Short Description	Record Status
最终影响/风险评	估 Final Impact/Risk Assessme	ent	
对产品质量的影响	旬 Impact on Product Quality:		
对其他批次的影响	旬 Impact on Other Batches:		
对系统/设备的影	响 Impact on System/Equipmer	nt:	
对验证状态的影响	旬 Impact on Validation State:		
对产品注册的影响	旬 Impact on Product Registratio	on:	
对法规符合性的影	影响 Impact on Regulation Comp	pliance:	
对稳定性的影响 I	Impact on Stability:		
对其他方面的影响	旬 Impact on Other Aspects:		
受影响的部门 Im	pact Departments:		
影响/风险评估附	件 Impact/Risk Assessment Atta	achment:	
受影响的产品信息	্ব Impacted Product Informati	ion	

产品最终处置建议 Product Disposition Proposal:

产品名称 Product Name:



PR#: 4771 Deviation No.:D-2020-0254

Record Status: Closed-Done

产品代码 Product Code 产品批号 Batch No.: 数量 Quantity 处理决定 Disposition

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

受影响的溶液信息 Impacted Media/Buffer Information

溶液名称 Media/Buffer Name:

受影响的设备信息 Impacted Equipment Information

设备名称 Equipment Name: 设备代码 Equipment Code

偏差处理措施 Deviation Action Items

PR#: 4780

责任人 Assigned To: 吴, 洪健(PID-000204) 部门 Department: M1b DS2

截止日期 Date Due:2020.08.28完成日期 Completed Date:2020.08.28确认人 Verified By:王, 淼淼(PID-000089)确认日期 Verified On:2020.08.28

行动项详细描述 Action Description:

通过对员工再次进行《M1b物品转运清洁消毒记录》(SMP00286-R1)和《良好记录规范规程》SMP00068文件培训,说明

物品取出操作人需要计算实际自净时间后,才能在消毒/自净时间是否符合时长列判断勾选.

PR#: 4781

责任人 Assigned To: 吴, 洪健(PID-000204) 部门 Department: M1b DS2

截止日期 Date Due: 2020.08.28 完成日期 Completed Date: 2020.08.28

确认人 Verified By: 王, 淼淼(PID-000089) 确认日期 Verified On: 2020.08.28

行动项详细描述 Action Description:

在M1b车间的气锁间放置计算器用于时间计算

纠正信息 Correction Information

PR#:

截止日期 Date Due: 完成日期 Completed Date:



PR#: 4771 Deviation No.:D-2020-0254

Record Status: Closed-Done

确认人 Verified By: 确认日期 Verified On:

行动项详细描述 Action Description:

纠正与预防措施 CAPA

PR#:

责任人 Assigned To: 部门 Department:

截止日期 Date Due:

行动项详细描述 Action Description:

附件 File Attachments

关联记录	Reterence	Records	
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PR# Record Type 简短描述 Short Description Record Status

相关子记录 Related children

PR# 4780	Record Type Deviation Action Items	简短描述 Short Description 对员工进行文件培训Document training for employees	Record Status Closed-Done
4781	Deviation Action Items	在气锁间放置计算器用于时间计算Place a calculator in the airlock room for time calculation	Closed-Done



PR#: 4771 Deviation No.:D-2020-0254

Record Status: Closed-Done

Record Status: Closed-Done			
Initial Approval			
QA Initial Review			
Area QA Initial Reviewed By:	王, 淼淼	Area QA Initial Reviewed On:	2020.08.27 10:46
Classify Completed By:	陈, 伊婷	Classify Completed On:	2020.08.28 09:35
Department Initial Review			
Department Leader 1 Reviewed By:	葛, 伟峰	Department Leader 1 Reviewed On:	2020.08.28 10:03
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:	2020.08.28 09:43
Quality Initial Approval			
Quality Approver 1 Approved By:	周, 峥	Quality Approver 1 Approved On:	2020.08.28 20:25
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			
A! ! - ! ! -		045' 18 ' 10	
QA Final Reviewed By:		QA Final Reviewed On:	
QA Final Reviewed By: Investigator Final Review		QA Final Reviewed On:	
-		QA Final Reviewed On: QA Representative Reviewed On:	
Investigator Final Review			
Investigator Final Review QA Representative Reviewed By:		QA Representative Reviewed On:	
Investigator Final Review QA Representative Reviewed By: Investigator 1 Reviewed By:		QA Representative Reviewed On: Investigator 1 Reviewed On:	
Investigator Final Review QA Representative Reviewed By: Investigator 1 Reviewed By: Investigator 2 Reviewed By:		QA Representative Reviewed On: Investigator 1 Reviewed On: Investigator 2 Reviewed On:	
Investigator Final Review QA Representative Reviewed By: Investigator 1 Reviewed By: Investigator 2 Reviewed By: Investigator 3 Reviewed By:		QA Representative Reviewed On: Investigator 1 Reviewed On: Investigator 2 Reviewed On: Investigator 3 Reviewed On:	
Investigator Final Review QA Representative Reviewed By: Investigator 1 Reviewed By: Investigator 2 Reviewed By: Investigator 3 Reviewed By: Investigator 4 Reviewed By:		QA Representative Reviewed On: Investigator 1 Reviewed On: Investigator 2 Reviewed On: Investigator 3 Reviewed On: Investigator 4 Reviewed On:	
Investigator Final Review QA Representative Reviewed By: Investigator 1 Reviewed By: Investigator 2 Reviewed By: Investigator 3 Reviewed By: Investigator 4 Reviewed By: Investigator 5 Reviewed By:		QA Representative Reviewed On: Investigator 1 Reviewed On: Investigator 2 Reviewed On: Investigator 3 Reviewed On: Investigator 4 Reviewed On: Investigator 5 Reviewed On:	
Investigator Final Review QA Representative Reviewed By: Investigator 1 Reviewed By: Investigator 2 Reviewed By: Investigator 3 Reviewed By: Investigator 4 Reviewed By: Investigator 5 Reviewed By: Investigator 6 Reviewed By:		QA Representative Reviewed On: Investigator 1 Reviewed On: Investigator 2 Reviewed On: Investigator 3 Reviewed On: Investigator 4 Reviewed On: Investigator 5 Reviewed On: Investigator 6 Reviewed On:	
Investigator Final Review QA Representative Reviewed By: Investigator 1 Reviewed By: Investigator 2 Reviewed By: Investigator 3 Reviewed By: Investigator 4 Reviewed By: Investigator 5 Reviewed By: Investigator 6 Reviewed By: Investigator 7 Reviewed By:		QA Representative Reviewed On: Investigator 1 Reviewed On: Investigator 2 Reviewed On: Investigator 3 Reviewed On: Investigator 4 Reviewed On: Investigator 5 Reviewed On: Investigator 6 Reviewed On: Investigator 7 Reviewed On:	
Investigator Final Review QA Representative Reviewed By: Investigator 1 Reviewed By: Investigator 2 Reviewed By: Investigator 3 Reviewed By: Investigator 4 Reviewed By: Investigator 5 Reviewed By: Investigator 6 Reviewed By: Investigator 7 Reviewed By: Investigator 7 Reviewed By: Investigator 8 Reviewed By:	y:	QA Representative Reviewed On: Investigator 1 Reviewed On: Investigator 2 Reviewed On: Investigator 3 Reviewed On: Investigator 4 Reviewed On: Investigator 5 Reviewed On: Investigator 6 Reviewed On: Investigator 7 Reviewed On:	On:
Investigator Final Review QA Representative Reviewed By: Investigator 1 Reviewed By: Investigator 2 Reviewed By: Investigator 3 Reviewed By: Investigator 4 Reviewed By: Investigator 5 Reviewed By: Investigator 6 Reviewed By: Investigator 7 Reviewed By: Investigator 7 Reviewed By: Investigator 8 Reviewed By: Investigator 8 Reviewed By: Investigator 8 Reviewed By:	-	QA Representative Reviewed On: Investigator 1 Reviewed On: Investigator 2 Reviewed On: Investigator 3 Reviewed On: Investigator 4 Reviewed On: Investigator 5 Reviewed On: Investigator 6 Reviewed On: Investigator 7 Reviewed On: Investigator 8 Reviewed On:	
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Quality Approver 2 Final Approved On:



PR#: 4771 Deviation No.:D-2020-0254

Record Status: Closed-Done

Quality Approver 3 Final Approved By: Quality Approver 3 Final Approved On:

Product Final Disposition

Disposition Proposed By:

Proposal Reviewed By:

Disposition Proposed On:

Proposal Reviewed On:

Product Disposition Approved By: Product Disposition Approved On: