

PR#: 11506 Deviation No.:D-2021-0052

Record Status: Closed-Done

基本信息 General Information

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

发起人 Originator: 王, 金祥(PID-000083) 发起日期 Date Opened: 2021.02.11

简短描述 Short Description:

M1b DS1原液分装系统故障 The M1b DS1 DS Fill system failure

到期日期 Date Due: 2021.04.21 关闭日期 Date Closed: 2021.03.24

偏差信息 Deviation Information

发现人 Discovery By: 展卫钧20002301 发现日期 Discovery On: 2021.02.10 汇报人Report By: 展卫钧20002301 汇报日期 Report On: 2021.02.10 发生部门 Occurred Department: M1b DS1 汇报部门 Report Department: M1b DS1

偏差描述 Deviation Description:

2021.02.10 16:08生产人员(20002301、20000392)在26C22纯化一线原液分装房间进行IBI308 DS2012006批次《信迪利单抗注射液M1b 3000L原液纯化批生产记录》(BPR100322-12),9.2.1步骤,原液分装最后一袋时,将C称作为最后原液分装的台秤,重新设置C称的分装重量为20kg,分装程序ready后,未人为点击分装开始按钮,原液分装设备自动运行,且中途自动打印称量标签后,程序停止,但500L中间产品袋中还剩余大约2kg的产品未过滤分装到原液袋中,且打印的标签显示是A称的标识,C称相关数据未被打印,与批记录分装要求不符,故发起偏差调查。

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:

NA

已采取的即时措施 Immediately Action Taken:

02/18/2021 04:50 PM (GMT+8:00) added by 金祥 王 (PID-000083):

1、结束之前的分装程序,将500L搅拌袋剩余原液继续过滤到C称原液袋,使用一个新的原液袋,无菌焊接到过滤后分装管路上,对新原液袋去皮后,将C称上过滤完成的原液转移到新原液袋中,并打印重量标签(见附件1)。MFG/2021.02.10

备注:由于输入日期不规范,故重新添加及时措施。

02/11/2021 01:52 PM (GMT+8:00) added by 金祥 王 (PID-000083):

1、结束之前的分装程序,将500L搅拌袋剩余原液继续过滤到C称原液袋,使用一个新的原液袋,无菌焊接到过滤后分装管路上,对新原液袋去皮后,将C称上过滤完成的原液转移到新原液袋中,并打印重量标签。MFG/202102.10

即时措施附件 Immediately Action Attachment:

附件1重新分装后打印重量标签.docx

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

M1b Commercial

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

产品影响评估 Product Impact Assessment:

在发生异常后,将500L搅拌袋剩余产品继续过滤分装到C称的原液袋中,然后无菌焊接新的原液袋到分装管路上,将C称原液袋中的产品通过原液分装的管路转移到新的原液袋中,管路在整个转移过程中都是密闭的,所以对产品质量没有影响。

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

该原液分装是本批次的最后一步,对后续生产没有影响。



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

原液分装系统,在分装最后一袋时,未按照设定程序运行,且打印标签与设定台秤编号不符,需进一步调查偏差发生的原因。

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:

对产品SISPQ的影响:

在发生异常后,将500L搅拌袋剩余产品继续过滤分装到C称的原液袋中,然后无菌焊接新的原液袋到分装管路上,将C称原液袋中的产品通过原液分装的管路转移到新的原液袋中,管路在整个转移过程中都处于密闭状态。

偏差发生率 Reoccurrence Probability of Deviation:

过去12个月该区域同类型缺陷回顾(关键词搜索: M1b DS1、原液分装系统故障)

未见同类型缺陷。

偏差分级 Deviation Classification: Minor

分级的理由 Reason for Classification:

02/18/2021 03:59 PM (GMT+8:00) added by 育芳 刘 (PID-000093):

该偏差还需进一步调查根本原因,根据根本原因考虑建立CAPA措施。

总上,该偏差定义为次要偏差。

是否需要调查? Investigation Required?: Yes

主调查人 Lead investigator: 秦, 传康

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

调查总结&根本原因分析 Investigation & RCA

调查总结 Investigation Summary:

1、 人员培训:

参与本批次IBI308 DS2012006批次《信迪利单抗注射液M1b 3000L原液纯化批生产记录》(BPR100322-12)的生产人员都已完成相关岗位的技能培训,并具备上岗资质。

(相关人员上岗证资质见附件2)

人员操作:

2021.02.10 16:08生产人员(20002301、20000392)在26C22纯化一线原液分装房间进行IBI308 DS2012006批次《信迪利单抗注射液M1b 3000L原液纯化批生产记录》(BPR100322-12),9.2.1步骤,原液分装最后一袋时生产人员(20000392)依照《M1b车间原液分装系统使用操作规程》(SOP200588),重新设置C秤的重量至20kg,此时A ,B秤重量为首次设置的重量11kg,程序设置完成点击START按钮,在等待按下C称分装按钮时,程序跳过C称按钮确认步骤,直接分装开始,并于2020.10.02 15:45:31程序终止,输出一张A称标签,标签显示状态是canceled(见附件3),此时中间产品袋中大约剩余2kg产品未分装。

正常操作:实际生产中应是先重新设置最后一袋的重量,对称HMI设置完成后,点击HMI上的START按钮,HMI会出现waiting for remote start的载入界面,然后操作人员去点击WPA WPB WPC按钮中的一个选择分装的秤,运行已经选择秤的程序。

经调查,目前原液分装自启动的情况有两种可能原因,其一,当设置好C称程序在HMI点击Start前,人员误触A称启动按钮,然后在称的面板上点击Start时,程序将会跳过C称按钮确认步骤,直接将样品分装到A称。其二,当设置好C称程序,并在HMI上点击Start后,人员调节蠕动泵转速时,原液分装系统强制默认对A称分装,分装自动进行。

小结:咨询现场操作人员并且和当班主管确认后,以上两种情况均未发生。

经调查,原液分装系统输出canceled的标签,有两种可能情况,其一,手动对"暂停/退出"键按下两次,系统分装结束,输出分装标签。其二,当原液分装过程连续出现两次超压的时候,系统默认分装结束,停止分装,输出标签。

小结:经调查现场操作人员并未手动点击"暂停/退出"按钮,并且原液分装过程中并未出现超压报警。

总结:人员操作过程中全程按照《M1b车间原液分装系统使用操作规程》(SOP200588),操作无误。

2 设备:

此次偏差涉及的设备详见附件4

总结:本次偏差所涉及设备在均在验证有效期、计量有效期以,设备无异常。

3、物料:

本次偏差无需涉及物料的调查。



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4、方法:

1. 文件记录:《信迪利单抗注射液M1b 3000L原液纯化批生产记录》(BPR100322-12)

生产操作人员按照批记录中9.2.1步骤操作,批记录操作没有问题。

2. 程序方法:《M1b车间原液分装系统使用操作规程》(SOP200588)中有对最后一袋原液分装操作的描述。

总结:方法规定无误,不是导致偏差的原因

5、环境:

本次偏差无需涉及环境的调查。

□ 调查总结:

原液分装系统在未点击(WPA/WPB/WPC)按钮就自动开始分装是一个偶然事件。

经调查,这种情况在生产中第一次出现,且这种情况能被及时的发现,能通过即时措施来处理这种情况后,不会影响产品质量

调查附件 Investigation Attachments:

附件2人员资质.docx

附件3异常标签.docx

附件4设备信息.PNG

根本原因分析 Root Cause Analysis:

原液分装系统在未点击(WPA/WPB/WPC)按钮就自动开始分装是一个偶然事件,后续会持续监控这种情况。

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

原因描述 Cause Description:

原液分装系统在未点击(WPA/WPB/WPC)按钮就自动开始分装是一个偶然事件,后续会持续监控这种情况。

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

Others Others N/A

缺陷描述 Defect Description:

2021.02.10 16:08生产人员(20002301、20000392)在26C22纯化一线原液分装房间进行IBI308 DS2012006批次《信迪利单 抗注射液M1b 3000L原液纯化批生产记录》(BPR100322-12),9.2.1步骤,原液分装最后一袋时,将C称作为最后原液分装的 台秤,重新设置C称的分装重量为20kg,分装程序ready后,未人为点击分装开始按钮,原液分装设备自动运行,且中途自动打印 称量标签后,程序停止,但500L中间产品袋中还剩余大约2kg的产品未过滤分装到原液袋中,且

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

Production/Process Operation

是否是重复偏差 Repeat Deviation?: No

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

N/A

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

N/A

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:

在发生异常后,将500L搅拌袋剩余产品继续过滤分装到C称的原液袋中,然后无菌焊接新的原液袋到分装管路上,将C称原液袋中的产品通过原液分装的管路转移到新的原液袋中,管路在整个转移过程中都是密闭的,所以对产品质量没有影响。

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|------|-------|----------------------|------|
| | | | |

Record Status: Closed-Done

对其他批次的影响 Impact on Other Batches:

N/A

对系统/设备的影响 Impact on System/Equipment:

N/A

对验证状态的影响 Impact on Validation State:

N/A

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

N/A

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

N/A

对稳定性的影响 Impact on Stability:

N/A

对其他方面的影响 Impact on Other Aspects:

N/A

受影响的部门 Impact Departments:

M1b DS1

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:

根据最终调查,本次偏差未对信迪利单抗注射液原液DS2012006的无菌性造成影响,所以该偏差不影响信迪利单抗注射液原液DS2012006的放行。

产品名称 Product Name: 信迪利单抗注射液M1b 3000L原液

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

DS30-308 DS2012006 3000L Release

受影响的物料信息 Impacted Material Information

物料名称 Material Name:

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

溶液名称 Media/Buffer Name:



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受影响的设备信息 Impacted Equipment Information

设备名称 Equipment Name: 原液分装系统 设备代码 Equipment Code MFG-M1b2-076

偏差处理措施 Deviation Action Items

PR#:

责任人 Assigned To: 部门 Department:

截止日期 Date Due: 完成日期 Completed Date:

确认人 Verified By: 确认日期 Verified On:

行动项详细描述 Action Description:

纠正信息 Correction Information

PR#:

责任人 Assigned To: 部门 Department:

截止日期 Date Due: 完成日期 Completed Date:

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#: 12670

责任人 Assigned To: 秦, 传康(PID-000285) 部门 Department: M1b DS1

截止日期 Date Due: 2021.04.10 行动项详细描述 Action Description:

升版M1b车间原液分装系统使用操作规程(SOP200588)1.在6.1.9设置重量后增加只使用目标称,其他称不启用。2.在6.1.9中

增加分装按钮需在点击start按钮,进入分装等待界面之后才可以触发。

附件 File Attachments

关联记录 Reference Records

PR# Record Type 简短描述 Short Description Record Status

相关子记录 Related children

PR# Record Type 简短描述 Short Description Record Status



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12506 Interim Investigation Report D-2021-0052偏差第一次阶段性报告 Closed-Done

D-2021-0052 First phase report of deviation

12669 CAPA 偏差D-2021-0052发起的CAPA CAPA initiated **Pending Effectiveness** Check

by Deviation D-2021-0052



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| Record Status. Closed-Done | Record Status. Closed-Done | | | | | | | | |
|--|----------------------------|---|------------|-------|--|--|--|--|--|
| Initial Approval | | | | | | | | | |
| QA Initial Review | | | | | | | | | |
| Area QA Initial Reviewed By: | 王, 杨晨 | Area QA Initial Reviewed On: | 2021.02.11 | 14:45 | | | | | |
| Classify Completed By: | 刘, 育芳 | Classify Completed On: | 2021.02.18 | 17:46 | | | | | |
| Department Initial Review | | | | | | | | | |
| Department Leader 1 Reviewed By: | 康, 云 | Department Leader 1 Reviewed On: | 2021.02.18 | 19:31 | | | | | |
| 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: | 吴, 烜 | Area QA Leader Reviewed On: | 2021.02.18 | 19:41 | | | | | |
| Quality Initial Approval | | | | | | | | | |
| Quality Approver 1 Approved By: | 管, 国兴 | Quality Approver 1 Approved On: | 2021.02.18 | 19:49 | | | | | |
| 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: | 刘, 育芳 | QA Final Reviewed On: | 2021.03.23 | 20:44 | | | | | |
| Investigator Final Review | | | | | | | | | |
| QA Representative Reviewed By: | 王, 杨晨 | QA Representative Reviewed On: | 2021.03.24 | 00:17 | | | | | |
| Investigator 1 Reviewed By: | 许, 峰 | Investigator 1 Reviewed On: | 2021.03.24 | 09:59 | | | | | |
| 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: | | | | | | | |
| Investigator 8 Reviewed By: Department Final Approval | | Investigator 8 Reviewed On: | | | | | | | |
| _ | : 康,云 | Investigator 8 Reviewed On: Department Leader 1 Final Approved On: | 2021.03.24 | 10:11 | | | | | |
| Department Final Approval | | | | 10:11 | | | | | |
| Department Final Approval Department Leader 1 Final Approved By | : | Department Leader 1 Final Approved On: | | 10:11 | | | | | |
| Department Final Approval Department Leader 1 Final Approved By Department Leader 2 Final Approved By | : | Department Leader 1 Final Approved On: Department Leader 2 Final Approved On: | | 10:11 | | | | | |
| Department Final Approval Department Leader 1 Final Approved By Department Leader 2 Final Approved By Department Leader 3 Final Approved By | : : : | Department Leader 1 Final Approved On: Department Leader 2 Final Approved On: Department Leader 3 Final Approved On: | | 10:11 | | | | | |
| Department Final Approval Department Leader 1 Final Approved By Department Leader 2 Final Approved By Department Leader 3 Final Approved By Department Leader 4 Final Approved By | : : : | Department Leader 1 Final Approved On: Department Leader 2 Final Approved On: Department Leader 3 Final Approved On: Department Leader 4 Final Approved On: | | 10:11 | | | | | |

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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: | 刘, 育芳 | Disposition Proposed On: | 2021.03.24 14:50 | | | | |
| Proposal Reviewed By: | | Proposal Reviewed On: | | | | | |
| Product Disposition Approved By: | 管, 国兴 | Product Disposition Approved On: | 2021.03.24 15:13 | | | | |