

PR#: 3409 Deviation No.:D-2020-0176

Record Status: Closed-Done

基本信息 General Information

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

发起人 Originator: 胡, 君寅(PID-000150) 发起日期 Date Opened: 2020.06.16

简短描述 Short Description:

M1b DS1 MFG-M1b2-127冷藏冷冻箱确认过程中温度超限 the temperature below limit happened during qualification

到期日期 Date Due: 2020.07.22 关闭日期 Date Closed: 2020.07.06

偏差信息 Deviation Information

偏差描述 Deviation Description:

M1b DS1 细胞培养房间(26D08)的冷藏冷冻箱(MFG-M1b2-127)验证数据已经导出,经过分析发现冷藏室7号探头(下层左侧内角落)温度在6.13日下午4点到4点10分出现温度偏低的情况(1.7~1.8℃)(见附件1 7号超温探头及附件2 7号探头温度数据曲线),验证标准为2-8℃,超出了验证下限。

描述的附件 Description attachment: 附件2:7号探头温度数据曲线.PNG

附件1:7号超温探头.png

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: 产品所属阶段 Product Phase:

M1b Commercial+Clinical

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

产品影响评估 Product Impact Assessment:

不涉及

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

由于冷藏冷冻箱中保存有分析仪器(血气分析仪,生化分析仪等)试剂,保存温度超限可能对试剂有影响,需进一步评估。

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

影响冷藏冷冻箱MFG-M1b2-127验证状态 , 验证方案号RQP001125 , 冷藏冷冻箱性能再确认方案。需进一步调查低温原因。

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:



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该冷藏冷冻箱中未储存产品,因此对产品质量没有影响,但需要在后续调查中评估对存放的检测试剂的影响。

偏差发生率 Reoccurrence Probability of Deviation:

过去12个月未发生类似偏差。(关键词:冷藏冷冻箱,再确认)

偏差分级 Deviation Classification: Minor

分级的理由 Reason for Classification:

06/17/2020 04:39 PM (GMT+8:00) added by 晓军 吴 (PID-000095):

根据偏差管理规程定义为次要偏差

是否需要调查? Investigation Required?: Yes

主调查人 Lead investigator: 胡, 君寅

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:

从人、机、料、法、环五方面展开分析。

物料:

冰箱存储物料均为规定试剂(清单见影响评估项表格), 无异常。(物料分布影响分析见方法)

名称 数量存储条件 设备 备注

B73983 3 2-8℃ 细胞计数仪细胞计数仪PM做完后的剩余试剂,可丢弃

质控液A水平3 4 2-8℃ 生化分析仪用于生化分析仪的质控

质控液A水平3 4 2-8℃ 生化分析仪用于生化分析仪的质控

活化剂 9 2-8℃ 生化分析仪用于生化分析仪使用前探针的表面活化处理

VI-CELL Focus Control 4 2-30℃ 细胞计数仪细胞计数仪PM做完后的剩余试剂,可丢弃

ISE清洗液 4 2-8℃ 生化分析仪用于生化分析仪使用前的管路清洗

葡萄糖检测试剂 3 2-8℃ 生化分析仪用于生化分析仪的葡萄糖浓度检测

铵离子检测试剂 3 生化分析仪用于生化分析仪的铵离子浓度检测

谷氨酰胺检测试剂 2 2-8℃ 生化分析仪用于生化分析仪的谷氨酰胺浓度检测

乳酸检测试剂 1 2-8℃ 生化分析仪用于生化分析仪的乳酸浓度检测

日常清洗液(MEDICA)1+7 2-8℃ 血气分析仪用于血气分析仪使用前的设备管路清洁

人员

人员资质:员工(20000225)培训过"温湿度分布验证标准操作规程"(SMP00206)。(见附件3:姜观龙-温湿度验证SOP培训记录)

人员操作:

- 1)员工(20001152)在2020.06.12执行再验证过程中,根据《冷藏冷冻箱性能再确认方案》(RQP00125)11.1.2规定的步骤进行设置探头、无异常
- 2)在2020.06.12-2020.06.15验证期间除放取温湿度探头外,无人员操作冰箱或者取用试剂。(见附件3:冷藏冷冻箱使用记录)小结:人员资质和人员操作无异常。

设备:

测试前冰箱状态:

2020.06.02在再验证执行前检查了冰箱的运行状态,温度设定点按照 "M1b车间冷藏冷冻箱使用清洁与维护标准操作规

程SOP200541"设定为5℃,通过查看冷藏箱内的Lab watch记录的数据(附件3),发现当天数据无异常,因此冰箱是处于良好的状态。

验证偏差发生后冰箱状态调查:

在偏差发生后,对冰箱按年度维护要求进行了检查,冰箱各项检测均合格,未发生异常。维护记录见(附件3:维护工单)

温度记录仪调查:

本次执行过程中所有使用的温度记录仪均在计量有效期内(校验证书见附件3:验证仪器的检查记录),因此温度记录仪的状态没有异常。

小结:验证使用的温度记录仪和冷藏冷冻箱均无异常。

方法:

本次验证的探头布点是按照《冷藏冷冻箱性能再确认方案》(RQP00125)附录6中布点图进行布点,布点照片见附件1.

《冷藏冷冻箱性能再确认方案》(RQP00125)对于如何布点有明确的描述,能够指导员工进行相应操作,因此再验证方案的制定无异常,根据附件1照片可以看出员工在布点时是按照《冷藏冷冻箱性能再确认方案》(RQP00125)中的布点图进行布点的,因此方法无异



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根据图中可以看到验证期间的装载物品与冷藏箱腔体存在比较大的间隙,同时内部隔板是镂空的支架,有利于冷藏箱内空气的流通,更容易行程冷热交换,因此验证期间装载方式无异常。

小结:《冷藏冷冻箱性能再确认方案》(RQP00125)对于如何布点有明确的描述,能够指导员工进行相应操作,因此再验证方案的制定无异常,根据照片可以看出员工在布点时是按照《冷藏冷冻箱性能再确认方案》(RQP00125)中的布点图进行布点的,因此方法无异常。

环境:

冷藏冷冻箱位于M1b车间DS区域1线细胞培养间(26D08),偏差发生期间(2020.06.13)该房间一直处于温湿度控制状态,温度为18℃~26℃(见附件3:环境调查曲线),期间未发生因为温湿度报警,因此环境不是引起偏差的原因。

从人机料法环角度,均未见异常。

从温度分布数据来看(见附件3:温度探头温度分布曲线),温度呈现从冷藏箱上部到下部逐渐递减的趋势,推断为冷空气下沉导致冷藏箱最底层温度较低,在波动过程中偶尔瞬间超下限。因此,考虑将物品优化放置,仅允许放置在冰箱最下层搁板上(见附件3:优化后装载),并进行了测试,持续25小时的温度分布数据均合格。(附件3:偏差调查原始数据汇总)

调查附件 Investigation Attachments:

附件3:偏差调查文件.rar

根本原因分析 Root Cause Analysis:

由于人机料法环都未有异常,推断装载分布不合理是偏差产生的可能根本原因。并根据推断结论重新优化了装载,经测试温度分布合格。 根本原因分析附件 Root Cause Analysis Attachment:

原因描述 Cause Description:

装载分布不合理

原因分类 Cause Category Method/procedure 原因子分类 Cause Sub-Category Process/System design

原因归属部门 Cause Department

QE

缺陷描述 Defect Description:

冷藏冷冻箱再确认温度超限

缺陷类型分类 Defect Category Facility/Utility/Equipment/Instrument

缺陷类型子分类 Defect Sub-Category

Validation

是否是重复偏差 Repeat Deviation?: No

判定重复偏差的原因 Justification for Repeat Deviation: 属于M1b冰箱的第一次再验证,初次验证中未发生此类偏差。

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: 此设备用于中控仪器质控品存放,不涉及产品。

对其他批次的影响 Impact on Other Batches:



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此设备用于中控仪器质控品存放,不涉及产品。

对系统/设备的影响 Impact on System/Equipment:

设备经年度检查,无问题,对设备无影响。

对验证状态的影响 Impact on Validation State:

对于验证结果的影响,本次验证规定的可接受标准为2-8℃,7号探头的记录的数据显示的最低温度为1.7℃,因此验证结果是失败的。 但优化装载后需重新执行温度验证分布,作为CAPA项进行追踪。

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

不涉及产品,无影响

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

无影响

对稳定性的影响 Impact on Stability:

无影响

对其他方面的影响 Impact on Other Aspects:

冰箱温度超低限可能影响以下试剂:

名称	数量存储条件	设备备	主
B73983 3	2-8℃ 细胞	包计数仪细胞计数仪	PM做完后的剩余试剂,可丢弃
质控液A水平3	4 2-8°C	生化分析仪用于生态	化分析仪的质控
质控液A水平3	4 2-8°C	生化分析仪用于生态	化分析仪的质控
活化剂 9	2-8°C	生化分析仪用于生态	化分析仪使用前探针的表面活化处理
VI-CELL Focus Control	4 2-30℃ 细胞	包计数仪细胞计数仪	PM做完后的剩余试剂,可丢弃
ISE清洗液 4	2-8°C	生化分析仪用于生态	化分析仪使用前的管路清洗
葡萄糖检测试剂 3	2-8°C	生化分析仪用于生态	化分析仪的葡萄糖浓度检测
铵离子检测试剂 3	2-8°C	生化分析仪用于生态	化分析仪的铵离子浓度检测
谷氨酰胺检测试剂	2 2-8℃	生化分析仪用	于生化分析仪的谷氨酰胺浓度检测
乳酸检测试剂	1 2-8℃	生化分析仪用	于生化分析仪的乳酸浓度检测
日常清洗液(MEDICA)	1+7 2-8℃ 血气	气分析仪用于血气分	析仪使用前的设备管路清洁

根据上表,可以得知冷藏箱内所有试剂溶液的均可存放在2-8℃的环境下,且所有的试剂溶液都有外包装,本次偏差发生时的温度变化情况为:2020.06.13 16:00至16:10时间段内温度数据为1.7~1.8℃,与2℃相比少了0.3℃。从风险角度来看,试剂溶液的外包装对于短时间的温度下降有一定的缓冲作用,包装内的液体的温度不会立刻下降至1.7℃。另外温度没有降低至零下,因此试剂溶液未发生冻融,对于溶液试剂的理化性质就没有发生改变,所以可以认为本次温度偏差对于冰箱内试剂溶液的影响可以忽略。

受影响的部门 Impact Departments:

QE

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:

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

This report was generated by 鹏云 徐 on 2021.06.12 08:47AM in Timezone GMT+08:00



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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:

受影响的设备信息 Impacted Equipment Information

设备名称 Equipment Name: 冷藏冷冻箱 设备代码 Equipment Code MFG-M1b2-127

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#:

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#: 3652

截止日期 Date Due: 2020.07.30



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行动项详细描述 Action Description:

对MFG-M1b2-127冷藏冷冻箱进行最下层装载限位标识张贴

PR#: 3653

责任人 Assigned To: 胡, 君寅(PID-000150) 部门 Department: QE

截止日期 Date Due: 2020.07.30 行动项详细描述 Action Description:

对MFG-M1b2-127冷藏冷冻箱装载限位后重新进行温度分布确认

附件 File Attachments

关联记录 R	eference	Record	S
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PR# 简短描述 Short Description **Record Type Record Status**

相关子记录 Related children

Record Type PR# 简短描述 Short Description **Record Status** 3651 CAPA 由偏差D-2020-0176触发的CAPA。 CAPA **Pending Effectiveness**



PR#: 3409 Deviation No.:D-2020-0176

Record Status: Closed-Done

Initial Approval			
QA Initial Review			
Area QA Initial Reviewed By:	王, 淼淼	Area QA Initial Reviewed On:	2020.06.16 17:35
Classify Completed By:	吴, 晓军	Classify Completed On:	2020.06.17 16:42
Department Initial Review			
Department Leader 1 Reviewed By:	葛, 伟峰	Department Leader 1 Reviewed On:	2020.06.17 17:56
Department Leader 2 Reviewed By:	刘, 焱	Department Leader 2 Reviewed On:	2020.06.17 17:55
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:	2020.06.17 17:40
Quality Initial Approval			
Quality Approver 1 Approved By:	周, 峥	Quality Approver 1 Approved On:	2020.06.17 18:05
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:	吴, 晓军	QA Final Reviewed On:	2020.06.30 16:47
Investigator Final Davis			
Investigator Final Review			
QA Representative Reviewed By:	王, 淼淼	QA Representative Reviewed On:	2020.06.30 17:19
	王, 淼淼 杨, 新进	QA Representative Reviewed On: Investigator 1 Reviewed On:	2020.06.30 17:19 2020.07.06 10:16
QA Representative Reviewed By:		·	
QA Representative Reviewed By: Investigator 1 Reviewed By:		Investigator 1 Reviewed On:	
QA Representative Reviewed By: Investigator 1 Reviewed By: Investigator 2 Reviewed By:		Investigator 1 Reviewed On: Investigator 2 Reviewed On:	
QA Representative Reviewed By: Investigator 1 Reviewed By: Investigator 2 Reviewed By: Investigator 3 Reviewed By:		Investigator 1 Reviewed On: Investigator 2 Reviewed On: Investigator 3 Reviewed On:	
QA Representative Reviewed By: Investigator 1 Reviewed By: Investigator 2 Reviewed By: Investigator 3 Reviewed By: Investigator 4 Reviewed By:		Investigator 1 Reviewed On: Investigator 2 Reviewed On: Investigator 3 Reviewed On: Investigator 4 Reviewed On:	
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 1 Reviewed On: Investigator 2 Reviewed On: Investigator 3 Reviewed On: Investigator 4 Reviewed On: Investigator 5 Reviewed On:	
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 1 Reviewed On: Investigator 2 Reviewed On: Investigator 3 Reviewed On: Investigator 4 Reviewed On: Investigator 5 Reviewed On: Investigator 6 Reviewed On:	
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 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:	
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:	杨, 新进	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:	2020.07.06 10:16
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 8 Reviewed By: Investigator 8 Reviewed By: Investigator 8 Reviewed By:	杨, 新进 葛, 伟峰	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:	2020.07.06 10:16
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: Department Final Approval Department Leader 1 Final Approved By:	杨, 新进 葛, 伟峰 刘, 焱	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: Investigator 8 Reviewed On:	2020.07.06 10:16 2020.07.06 11:01 2020.07.06 12:36
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 8 Reviewed By: Investigator 8 Reviewed By: Department Final Approval Department Leader 1 Final Approved By: Department Leader 2 Final Approved By:	杨, 新进 葛, 伟峰 刘, 焱	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: Investigator 8 Reviewed On: Department Leader 1 Final Approved On: Department Leader 2 Final Approved On:	2020.07.06 10:16 2020.07.06 11:01 2020.07.06 12:36 2020.07.06 10:47
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 8 Reviewed By: Investigator 8 Reviewed By: Department Final Approval Department Leader 1 Final Approved By: Department Leader 2 Final Approved By:	杨, 新进 葛, 伟峰 刘, 焱	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: Investigator 8 Reviewed On: Department Leader 1 Final Approved On: Department Leader 2 Final Approved On: Department Leader 3 Final Approved On:	2020.07.06 10:16 2020.07.06 11:01 2020.07.06 12:36 2020.07.06 10:47
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Quality Approver 2 Final Approved By:

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PR#: 3409 Deviation No.:D-2020-0176

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: