

PR#: 6637 Deviation No.:D-2020-0341

Record Status: Closed-Done

### 基本信息 General Information

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

发起人 Originator: 杨, 新进(PID-000108) 发起日期 Date Opened: 2020.11.13

简短描述 Short Description:

M1b DS1 物品未按规定流程传入反应器房间的偏差 Deviation of wrong item transfer in bioreactor room

到期日期 Date Due: 2020.12.17 关闭日期 Date Closed: 2020.12.15

#### 偏差信息 Deviation Information

发现人 Discovery By:赵阳 05020026发现日期 Discovery On:2020.11.13汇报人Report By:杨新进 05180018汇报日期 Report On:2020.11.13

发生部门 Occurred Department: M1b DS1 汇报部门 Report Department: M1b DS1

偏差描述 Deviation Description:

2020.11.13日上午11:25,生产部员工(工号05020026)在M1b一线细胞培养间(房间编号26D08)发现有人(工号20003210)手里拿着纸质笔记本欲进入离心收获间(房间编号26D09),于是上前询问,经询问得知该人员是将纸质笔记本随身携带由CNC区域通过人流通道进入细胞培养间(房间编号26D08,D级区)。与《M1b生产区物品转运标准操作规程》(SMP00286)中第6.3.1:物料、产品、设备等由低级别区域向高级别区域传递时,必须经过清洁消毒才能传入,减少带入污染物的风险,可用75%乙醇或杀孢子剂润湿的洁净无尘布或预湿结净无尘布分段擦拭表面。并按照要求填写《M1b物品转运清洁消毒记录》,记录传递物品名称、消毒剂批号、作用时间等相关信息和第6.3.7进入C/D级区域的纸质文件不需要消毒,但需在高级别缓冲间或在警示线靠高级别一侧自净满足30分钟以上的要求不符,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:

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

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

产品影响评估 Product Impact Assessment:

细胞培养间的反应器均为密闭容器,不与外界接触,也无敞口操作,故对产品无影响。人员和物品尚未进入收获间,故对细胞收获间没有造成影响。

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

细胞培养间的反应器均为密闭容器,不与外界接触,也无敞口操作,故对产品无影响

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

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



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### 偏差分级 Deviation Classification

偏差严重性 Deviation Severity:

对产品SISPQ和环境的影响:

胞培养间的反应器均为密闭容器,不与外界接触,也无敞口操作,故对产品无影响。人员和物品尚未进入收获间,故对细胞收获间没有造成影响。

偏差发生率 Reoccurrence Probability of Deviation:

过去12个月同类型缺陷回顾(关键词搜索: M1b DS1、物品进入洁净区、未自净)

未发现同类型缺陷。

偏差分级 Deviation Classification: Minor

分级的理由 Reason for Classification:

11/16/2020 03:47 PM (GMT+8:00) added by 育芳 刘 (PID-000093):

该偏差还需进一步分析根本原因,根据根本原因考虑建立CAPA措施,

因该偏差不涉及产品影响,根据《偏差管理规程》(SMP00096),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: 孟, 凡贝

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:

偏差调查:

本次偏差主要是人员违反《M1b生产区物品转运标准操作规程》所造成的偏差,本偏差不涉及物料,设备和环境,故偏差调查将从人员和方法两个方面进行:

人员:

人员资质:工程部自控工程师(工号20003210)已于2020.10.28日线上完成《M1b生产区物品转运标准操作规程》(SMP00286-06)的培训,2020.11.05日完成自控技能上岗(附件3:上岗证),在2020.10.19日完成了《M1b区域人员更衣流程》(SMP00290-06)的培训,并于2020.10.21完成了人员更衣流程的实操培训(门禁申请记录见附件2),所以人员的资质是没有问题的。

工程部自控工程师(工号20003210)进入洁净区是为了给洁净区的DCS系统HMI贴系统标签,因为HMI数量比较多,为了准确记录标签信息避免混淆,直接将将纸质笔记本随身携带,由CNC区域通过人流通道进入细胞培养间(房间编号26D08,D级区)。经与人员(20003210)沟通了解:自2020.11.05日人员(20003210)上岗至偏差发生2020.11.13日期间,人员(20003210)并未独自进行过生产区物品转运,只是见过一次生产人员从CNC传递过物料进入C级洁净区,知道物料传递需要按照《M1b生产区物品转运标准操作规程》(SMP00286-06)文件进行,但是对文件传递也需要按照文件(SMP00286)进行不是很明确,人员对生产区物品转运要求并不熟悉,未按照要求将纸质笔记本在高级别缓冲间或在警示线靠高级别一侧自净满足30分钟以上,所以导致偏差发生。

小结:人员(20003210)对生产区物品转运要求并不熟悉,未按照要求将纸质笔记本在高级别缓冲间或在警示线靠高级别一侧自净满足30分钟以上。

#### 方法:

《M1b生产区物品转运标准操作规程》(SMP00286)中第6.3.1:物料、产品、设备等由低级别区域向高级别区域传递时,必须经过清洁消毒才能传入,减少带入污染物的风险,可用75%乙醇或杀孢子剂润湿的洁净无尘布或预湿结净无尘布分段擦拭表面。并按照要求填写《M1b物品转运清洁消毒记录》(SMP00286-R1,04),记录传递物品名称、消毒剂批号、作用时间等相关信息和第6.3.7进入C/D级区域的纸质文件不需要消毒,但需在高级别缓冲间或在警示线靠高级别一侧自净满足30分钟以上。

《M1b物品转运清洁消毒记录》(SMP00286-R1,04)中也有对物品转运的注释(见附件4)

《M1b生产区物品转运标准操作规程》(SMP00286)中对于物品的传递操作的描述全面,本次偏差是工程部自控工程师(工号20003210)未按照要求将纸质笔记本在高级别缓冲间或在警示线靠高级别一侧自净满足30分钟以上导致,所以并不是方法的问题。小结:《M1b生产区物品转运标准操作规程》(SMP00286)中对于物品的传递操作的描述全面,方法流程无异常。

综上所述:本次偏差的原因是工程部自控工程师(工号20003210)是新员工,刚刚上岗,对《M1b生产区物品转运标准操作规程》(SMP00286)的理解不够深入,文件培训不到位,对物品传递相关要求不熟悉。

调查附件 Investigation Attachments:

\\NAS.xdsw.local\UserFolder\fanbei.meng\桌面\附件3:上岗证.pdf



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\\NAS.xdsw.local\UserFolder\fanbei.meng\桌面\附件2 M1b门禁申请.pdf

\\NAS.xdsw.local\UserFolder\fanbei.meng\桌面\附件4.png

根本原因分析 Root Cause Analysis:

根本原因:本次偏差的根本原因是工程部自控工程师(工号20003210)对M1b生产区物品转运标准操作规程》(SMP00286)的培训不

到位,对物品传递相关要求不熟悉。

CAPA:对工程部全员进行《M1b生产区物品转运标准操作规程》(SMP00286)的再培训。

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

\\NAS.xdsw.local\UserFolder\fanbei.meng\桌面\变更与偏差\其他\SMP00090-R7-01人为原因调查检查表.docx

原因描述 Cause Description:

本次偏差的根本原因是工程部自控工程师(工号20003210)对M1b生产区物品转运标准操作规程》(SMP00286)的培训不到

位,对物品传递相关要求不熟悉。

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

Human Training ENG

缺陷描述 Defect Description:

2020.11.13日上午11:25,生产部员工在M1b一线细胞培养间发现有人手里拿着纸质笔记本欲进入离心收获间,于是上前询

问,经询问得知该人员是将纸质笔记本随身携带由CNC区域通过人流通道进入细胞培养间(房间编号26D08,D级

区)。与《M1b生产区物品转运标准操作规程》中第6.3.1:物料、产品、设备等由低级别区域向高级别区域传递时,必须经过清洁消毒才能传入,减少带入污染物的风险,可用75%乙醇或杀孢子剂润湿的洁净无尘布或预湿结净无尘布分段擦拭表面。并按照

要求填写《M1b物品转运清洁消毒记录》,记录

缺陷类型分类 Defect Category

缺陷类型子分类 Defect Sub-Category

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个月同类型缺陷回顾(关键词搜索: M1b DS1、物品进入洁净区、未自净)

未发现同类型缺陷。

Production/Process

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:

对产品的影响:2020.11.13日上午11:25,现场正在培养的批次为:DS2010005批次的150L反应器种子培养,DS2009005批次的3000LD12天培养,DS2009017批次的3000LD4天培养。均在反应器中进行密闭培养,不与车间环境接触,现场无正在进行的操作。故本偏差对产品无影响。

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:

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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:

对洁净区环境的影响:人员(工号20003210)在携带纸质笔记本欲进入离心收获间(房间编号26D09)的途中被发现,发现后马上采取了措施将纸质笔记本带离反应器房间(房间编号26D08),纸质笔记本在房间的停留时间不长,而且房间具备换气和自净功能,经过查询清洁记录,该房间的日清也按时完成。综上,该偏差对洁净区环境影响有限,且该影响可以通过房间的自净和每日清洁消除。

受影响的部门 Impact Departments:

MFG General

ENG

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

### 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



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设备名称 Equipment Name: 设备代码 Equipment Code

## 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#: 7417

责任人 Assigned To: 黄, 俊(PID-000116) 部门 Department: ENG

截止日期 Date Due: 2020.12.31 行动项详细描述 Action Description:

对工程部全员进行《M1b生产区物品转运标准操作规程》(SMP00286)的再培训。

#### 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 DescriptionRecord Status7412CAPA偏差D-2020-0341Pending EffectivenessCheck



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Initial Approval			
QA Initial Review			
Area QA Initial Reviewed By:	王, 淼淼	Area QA Initial Reviewed On:	2020.11.13 15:22
Classify Completed By:	刘, 育芳	Classify Completed On:	2020.11.16 15:52
Department Initial Review			
Department Leader 1 Reviewed By:	于, 庆华	Department Leader 1 Reviewed On:	2020.11.16 17:51
Department Leader 2 Reviewed By:	邓, 献存	Department Leader 2 Reviewed On:	2020.11.16 17:57
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:	2020.11.16 16:45
Quality Initial Approval			
Quality Approver 1 Approved By:	管, 国兴	Quality Approver 1 Approved On:	2020.11.16 18:17
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:	2020.12.10 16:38
Investigator Final Review			
QA Representative Reviewed By:	王, 沛芳	QA Representative Reviewed On:	2020.12.10 18:48
QA Representative Reviewed By: Investigator 1 Reviewed By:	王, 沛芳 杨, 新进	QA Representative Reviewed On: Investigator 1 Reviewed On:	2020.12.10 18:48 2020.12.14 16:15
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Investigator 1 Reviewed By:		Investigator 1 Reviewed On:	
Investigator 1 Reviewed By: Investigator 2 Reviewed By:		Investigator 1 Reviewed On: Investigator 2 Reviewed On:	
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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:	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: Investigator 8 Reviewed On: Investigator 8 Reviewed On:	2020.12.14 16:15  2020.12.14 17:55 2020.12.15 17:51
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	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:	2020.12.14 16:15  2020.12.14 17:55 2020.12.15 17:51
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: Department Leader 3 Final Approved 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: 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:	2020.12.14 16:15 2020.12.14 17:55 2020.12.15 17:51
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Quality Approver 2 Final Approved By:

Quality Approver 2 Final Approved On:



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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: