# 偏差报告
# Deviation Report

PR#: 14551 Deviation No.:D-2021-0244

Record Status: Closed-Done

## 基本信息 General Information

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

发起人 Originator: 王, 金祥(PID-000083) 发起日期 Date Opened: 2021.05.18

简短描述 Short Description:
M1b DS1亲和层析cycle1 UV检测用稀释溶液pH未调中性 The pH of the buffer for UV testing sample dilution is not neutralized in DS2103015AC1

到期日期 Date Due: 2021.05.19 关闭日期 Date Closed: 2021.05.20

## 偏差信息 Deviation Information

发现人 Discovery By: 郭一波20000502 发现日期 Discovery On: 2021.05.18

汇报人Report By: 王金祥05040068 汇报日期 Report On: 2021.05.18

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

偏差描述 Deviation Description:
2021.05.18 00:25纯化人员（20000502）在调节完离心管亲和洗脱液（DS2103015-S285-01）后，发现DS2103015AC1蛋白检测的洗脱液未进行pH调节；与《信迪利单抗注射液（二代细胞株）M1b 3000L原液纯化批生产记录》（文件编码/版本：BPR100468/02，批号：DS2103015）中1.6蛋白含量检测（3）中“用IBI308用IBI308 2nd 2 mol/L Tris Base将IBI308 2nd亲和洗脱液调节至pH6.0~8.0之间作为稀释液”的要求不符。故发起偏差。

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:
N/A

已采取的即时措施 Immediately Action Taken:
05/18/2021 07:32 PM (GMT+8:00) added by 金祥 王 (PID-000083):
N/A

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:
本次偏差只涉及样品检测的背景溶液的pH调节,不涉及产品工艺生产;故对产品的质量无影响。

生产/检测的影响评估 Production/Testing Impact Assessment:
本次是DS2103015AC1蛋白含量检测，背景溶液为“100mM甘氨酸-盐酸，30mM氯化钠，pH3.50”。该溶液在工艺生产中为亲和洗脱液。根据《信迪利单抗注射液（二代细胞株）3000L原液纯化工艺规程》（PFD00173/03）对亲和收集液pH调节要求 “由于亲和收集液pH较低，不利于保存”，可知此pH较低的条件下抗体不稳定，会导致浓度检测结果不准确，因此需要重新检测（检测结果建立偏差行动项PR#14561）。目前AC1蛋白含量的结果已经重新引用执行完偏差行动项后的检测结果，因此对当前步骤的影响较小；其次，亲和cycle1收集液送QC检测纯度和残留的送样单样品浓度已更正（见附件1），因此对检测结果无影响；再次亲和cycle1收集液浓度不影响AC混合后的蛋白含量检测且cycle1收集液浓度不会用于后续的生产。综上，本偏差对后续生产和检测无影响。

其他影响评估描述 Other Impact Assessment Description:
本次偏差纯化人员未按照批生产记录的要求，确认完亲和洗脱液调节至pH6.0~8.0之间再进行使用，导致了偏差。《信迪利单抗注射液（二代细胞株）M1b 3000L原液纯化批生产记录》（文件编码/版本：BPR100468/02，批号：DS2103015）中1.6蛋白含量检测（3）中已经明确“用IBI308用IBI308 2nd 2 mol/L Tris Base将IBI308 2nd亲和洗脱液调节至pH6.0~8.0之间作为稀释液”要求，现

# 偏差报告
# Deviation Report

PR#: 14551 Deviation No.:D-2021-0244

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有流程无问题，能够有效指导后续生产。因此，由于人员疏忽导致操作错误是本次偏差发生的原因。截至目前类似蛋白含量检测已被执行2年多，未发生类似事件，因此为一起人员操作失误的偶发性事件，暂不考虑制定相关CAPA。为了巩固人员对该操作的细节，现建立偏差行（PR#14616），对操作人员进行线下培训。

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：
本次偏差只涉及样品检测的背景溶液的pH调节,不涉及产品工艺生产;故对产品的质量无影响。

偏差发生率 Reoccurrence Probability of Deviation:
过去12个月该区域同类型缺陷会（关键词搜索：M1b DS1、亲和层析cycle1、 UV检测用稀释溶液pH未调中性）
未发现同类型缺陷。

偏差分级 Deviation Classification: Minor

分级的理由 Reason for Classification:
05/19/2021 05:16 PM (GMT+8:00) added by 育芳 刘 (PID-000093):
该偏差原因及影响明确，无需进行进一步的调查，
综上，该偏差定义为次要偏差。

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:
该偏差原因及影响明确，无需进行进一步的调查。

## 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:

本次偏差纯化人员未按照批生产记录的要求，确认完亲和洗脱液调节至pH6.0~8.0之间再进行使用，导致了偏差。

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

原因描述 Cause Description:
本次偏差纯化人员未按照批生产记录的要求，确认完亲和洗脱液调节至pH6.0~8.0之间再进行使用，导致了偏差。

| 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 DS1 |

# 偏差报告
# Deviation Report

PR#: 14551 Deviation No.:D-2021-0244

Record Status: Closed-Done

缺陷描述 Defect Description:
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| 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? : N/A

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

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

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:

受影响的部门 Impact Departments:

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

# 偏差报告
# Deviation Report

PR#: 14551 Deviation No.:D-2021-0244

Record Status: Closed-Done

## 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:

| 溶液代码 Media/Buffer Code: | 批号 Batch No.: | 数量 Quantity: |
|---|---|---|

## 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#: 14561

| | | | |
|---|---|---|---|
| 责任人 Assigned To: | 王, 金祥(PID-000083) | 部门 Department: | M1b DS1 |
| 截止日期 Date Due: | 2021.05.19 | 完成日期 Completed Date: | 2021.05.18 |
| 确认人 Verified By: | 吴, 烜(PID-000235) | 确认日期 Verified On: | 2021.05.19 |

行动项详细描述 Action Description:
由于UV检测的背景溶液未进行pH调节，缓冲液pH较低，对亲和收集液的浓度检测有影响。故需要对DS2103015AC1样品重新检测。

PR#: 14616

| | | | |
|---|---|---|---|
| 责任人 Assigned To: | 王, 金祥(PID-000083) | 部门 Department: | M1b DS1 |
| 截止日期 Date Due: | 2021.05.19 | 完成日期 Completed Date: | 2021.05.19 |
| 确认人 Verified By: | 吴, 烜(PID-000235) | 确认日期 Verified On: | 2021.05.20 |

# 偏差报告
# Deviation Report

PR#: 14551 Deviation No.:D-2021-0244

Record Status: Closed-Done

行动项详细描述 Action Description:
对本次操作人员培训：强调蛋白检测过程中要注意确认背景溶液是否已经满足检测需求。

## 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#:

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

附件1更正后的送样单.pdf

## 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 |
|---|---|---|---|
| 14561 | Deviation Action Items | 重新检测亲和 cycle1蛋白含量 To re-test the AC1 pool concentration | Closed-Done |
| 14616 | Deviation Action Items | 人员操作培训 Personnel operation training | Closed-Done |

# 偏差报告
# Deviation Report

PR#: 14551 Deviation No.:D-2021-0244

Record Status: Closed-Done

## Initial Approval

### QA Initial Review

| | | | |
|---|---|---|---|
| Area QA Initial Reviewed By: | 吴, 烜 | Area QA Initial Reviewed On: | 2021.05.18 19:46 |
| Classify Completed By: | 刘, 育芳 | Classify Completed On: | 2021.05.19 19:48 |

### Department Initial Review

| | | | |
|---|---|---|---|
| Department Leader 1 Reviewed By: | 康, 云 | Department Leader 1 Reviewed On: | 2021.05.19 19:55 |
| 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: | 2021.05.20 09:28 |

### Quality Initial Approval

| | | | |
|---|---|---|---|
| Quality Approver 1 Approved By: | 管, 国兴 | Quality Approver 1 Approved On: | 2021.05.20 10:54 |
| 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: |

### 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: |

# 偏差报告
# Deviation Report

PR#: 14551 Deviation No.:D-2021-0244

Record Status: Closed-Done

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: