

PR#: 15344

Deviation No.:D-2021-0276

Record Status: Deviation Investigation in Progress

基本信息 General Information

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

发起人 Originator: 刘, 希雨(PID-000333)

发起日期 Date Opened: 2021.06.08

简短描述 Short Description:

M1b DS1 SIP和CIP程序共用阀冲突导致WFI进入补料管路 SIP and CIP program conflict with shared valve caused WFI into feeding line

到期日期 Date Due: 2021.07.13

关闭日期 Date Closed:

偏差信息 Deviation Information

发现人 Discovery By: 葛杰20003818

发现日期 Discovery On: 2021.06.07

汇报人 Report By: 赵阳05020026

汇报日期 Report On: 2021.06.07

发生部门 Occurred Department: M1b DS1

汇报部门 Report Department: M1b DS1

偏差描述 Deviation Description:

2021.06.07 16:40 生产人员 (20004191、20003818) 在细胞培养间(26D08)进行BI308 DS2105003 批次3000L阶段的旁路补料管路SIP (程序: EPH_SIP_BAG_ADD 2160) 时, 发现ZF19补料管路后端疏水阀有漏水现象 (附件1 补料管路后端疏水阀漏水), 检查发现旁路补料管路有积水, 可能存在污染风险, 故发起偏差。

描述的附件 Description attachment:

附件1 补料管路后端疏水阀漏水.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:

06/08/2021 04:32 PM (GMT+8:00) added by 希雨 刘 (PID-000333):

发现补料管路疏水阀有漏水现象后, 对程序EPH_SIP_BAG_ADD (2160)进行Abort操作 (见附件2 Abort操作)。

MFG 2021.06.07

即时措施附件 Immediately Action Attachment:

附件2 Abort操作.jpg

厂房设施名称 Facility Name:

M1b

产品所属阶段 Product Phase:

Commercial

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

产品影响评估 Product Impact Assessment:

补料旁路SIP开始时间为2021.06.07 16:40, 并于16:42中止。750L到3000L反应器CIP程序WFI润洗步骤开始时间为2021.06.07 16:36, 结束时间为2021.06.07 16:45 (见附件3 偏差涉及750L至3000L转种管道CIP程序WFI润洗步骤起止时间)。

(1) 对CIP程序执行效果的影响方面, 理论上, 由于WFI泄露至其他旁路, 对转种管道的润洗效果可能会减弱或下降, 但是根据实际情况, WFI泄露量比较少, 回水电导率在16:39分左右即符合要求 (见附件4 偏差涉及750L至3000L转种管道CIP回水电导率趋势图) (实际电导率值为: 0.22us/cm, 合格标准: $\leq 2.7\text{us/cm}$), 补料旁路SIP开始时间为16:40, 因此判断对CIP程序执行效果无影响。

(2) 对补料旁路的SIP执行效果的影响方面, 由于及时中止了SIP程序, 并于18:06重新进行了SIP, 在SIP过程中, 会向疏水阀方向排放残留水和冷凝水, 本次SIP过程无异常, 因此判断对SIP执行效果无影响。

(3) 对罐体无菌状态保持的影响方面, 本次偏差发生过程中, 由于直接和罐体连通的阀门UV-15A-Z912 (见附件5 Z19旁路补料PID示意图) 始终处于关闭状态。

综上, 本次偏差不会影响产品质量。

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

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本次偏差不会影响罐体整体无菌保持状态，对750L至3000L转种管道的CIP执行效果如上所述无影响，补料旁路的SIP经过重新执行，故对后续生产无影响。

其他影响评估描述 Other Impact Assessment Description:
导致补料管路疏水阀有漏水的原因会在偏差的第二部分进行调查。

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

附件5 Z19旁路补料PID示意图.png

附件3 偏差涉及750L至3000L转种管道CIP程序WFI润洗步骤起止时间.jpg

附件4 偏差涉及750L至3000L转种管道CIP回水电导率趋势图.jpg

偏差分级 Deviation Classification

偏差严重性 Deviation Severity:

补料旁路SIP开始时间为2021.06.07 16:40，并于16:42中止。750L到3000L反应器CIP程序WFI润洗步骤开始时间为2021.06.07 16:36，结束时间为2021.06.07 16:45（见附件3 偏差涉及750L至3000L转种管道CIP程序WFI润洗步骤起止时间）。

（1）对CIP程序执行效果的影响方面，理论上，由于WFI泄露至其他旁路，对转种管道的润洗效果可能会减弱或下降，但是根据实际情况，WFI泄露量比较少，回水电导率在16:39分左右即符合要求（见附件4 偏差涉及750L至3000L转种管道CIP回水电导率趋势图）（实际电导率值为：0.22us/cm，合格标准：≤2.7us/cm），补料旁路SIP开始时间为16:40，因此判断对CIP程序执行效果无影响。

（2）对补料旁路的SIP执行效果的影响方面，由于及时中止了SIP程序，并于18:06重新进行了SIP，在SIP过程中，会向疏水阀方向排放残留水和冷凝水，本次SIP过程无异常，因此判断对SIP执行效果无影响。

（3）对罐体无菌状态保持的影响方面，本次偏差发生过程中，由于直接和罐体连通的阀门UV-15A-Z912（见附件5 Z19旁路补料PID示意图）始终处于关闭状态。

综上，本次偏差不会影响产品质量。

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、SIP和CIP程序、共用阀冲突、WFI进入补料管路）
未发现同类型缺陷。

偏差分级 Deviation Classification: Major

分级的理由 Reason for Classification:

06/09/2021 06:07 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。

综上，该偏差定义为主要偏差。

是否需要调查？ Investigation Required?: Yes

主调查人 Lead investigator: 张, 允虎

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:

调查附件 Investigation Attachments:

根本原因分析 Root Cause Analysis:

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

偏差报告

Deviation Report

PR#:15344Deviation No.:D-2021-0276

Record Status: Deviation Investigation in Progress

原因描述 Cause Description:

原因分类 Cause Category

原因子分类 Cause Sub-Category

原因归属部门 Cause Department

缺陷描述 Defect Description:
2021.06.07 16:40 生产人员 (20004191、20003818) 在细胞培养间(26D08)进行BI308 DS2105003 批次3000L阶段的旁路补料管路SIP (程序 : EPH_SIP_BAG_ADD 2160) 时,发现ZF19补料管路后端疏水阀有漏水现象 (附件1 补料管路后端疏水阀漏水), 检查发现旁路补料管路有积水,可能存在污染风险,故发起偏差。

缺陷类型分类 Defect Category
Production/Process

缺陷类型子分类 Defect Sub-Category
Operation

是否是重复偏差 Repeat Deviation? :

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

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:

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受影响的部门 Impact Departments:

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
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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
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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:
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受影响的设备信息 Impacted Equipment Information

设备名称 Equipment Name: 生物反应器(3000L)	设备代码 Equipment Code MFG-M1b2-057
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偏差处理措施 Deviation Action Items

PR#:15641	
责任人 Assigned To: 张, 允虎(PID-000298)	部门 Department: MST
截止日期 Date Due: 2021.06.30	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:	

偏差报告
Deviation Report

PR#: 15344

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目的:

对该偏差出现的异常情况,即750L反应器(设备代码:MFG-M1B2-054,以下简称14A)到3000L反应器(设备代码:MFG-M1B2-057,以下简称15C)转种管路CIP运行过程仍能启动15C补料旁路SIP(两个Phase共用模块 IL11,理论上由于 IL11被占用会导致15C补料旁路SIP无法启动)进行场景模拟和还原,根据测试结果,判断该偏差属于必然事件还是偶然事件,以对后期制定CAPA提供参考。

测试方法:

- 搭建batch:参考IBI308 commercial recipe,搭建14A以及15C-11C batch, batch命名原则参考“PCS7自控系统标准操作规程”(SOP200576)测试过程batch命名原则。
- 测试:首先运行14A batch,跳步至EPH_CIP_TRANS,执行14A-15C转种管路CIP。CIP执行期间,点击运行15C-11C batch,跳步至EPH_SIP_BAG_ADD,执行15C补料旁路SIP。
- 为考察本偏差(14A-15C转种管路CIP和15C补料旁路CIP涉及共用EM却因无法实现互锁导致程序能够同时运行)发生的概率,执行3次以上测试,根据测试结果对本偏差发生的概率进行分析和总结。每次测试结束后,根据需要可对CIP和SIP程序进行Abort操作,执行3次测试后,本次试验结束。

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

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# 15630	Record Type Investigation Task	简短描述 Short Description D-2021-0276 M1b DS1 CIP和SIP程序测试 CIP and SIP program testing of D-2021-0276 M1b DS1	Record Status Closed-Cancelled
15641	Deviation Action Items	D-2021-0276 M1b DS1 CIP和SIP程序测试 CIP and SIP program testing of D-2021-0276 M1b DS1	Opened

偏差报告 Deviation Report

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Record Status: Deviation Investigation in Progress

Initial Approval

QA Initial Review

Area QA Initial Reviewed By:	王, 杨晨	Area QA Initial Reviewed On:	2021.06.09 09:50
Classify Completed By:	刘, 育芳	Classify Completed On:	2021.06.09 18:09

Department Initial Review

Department Leader 1 Reviewed By:	康, 云	Department Leader 1 Reviewed On:	2021.06.09 18:31
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:	代, 圆圆	Area QA Leader Reviewed On:	2021.06.09 20:00

Quality Initial Approval

Quality Approver 1 Approved By:	管, 国兴	Quality Approver 1 Approved On:	2021.06.09 21:11
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#: 15344

Deviation No.:D-2021-0276

Record Status: Deviation Investigation in Progress

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: