

PR#: 14216 Deviation No.:D-2021-0230

Record Status: Closed-Done

基本信息 General Information

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

发起人 Originator: 刘, 晶晶(PID-000080) 发起日期 Date Opened: 2021.05.11

简短描述 Short Description:

M1b DS1 IBI308 2nd CEX步骤上样载量低于操作范围 The sample load of IBI308 2nd CEX step is below the operating range

到期日期 Date Due: 2021.05.12 关闭日期 Date Closed: 2021.05.13

偏差信息 Deviation Information

发现人 Discovery By: 刘晶晶20000454 发现日期 Discovery On: 2021.05.11 汇报人Report By: 刘晶晶20000454 汇报日期 Report On: 2021.05.11

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

偏差描述 Deviation Description:

2021.05.11 12:40 纯化人员在计算CEX理论上样量时发现,计划上样量为1055.53kg小于最小上样量1064.01,偏离《信迪利单抗注射液(二代细胞株)M1b3000L原液纯化批生产记录》(BPR100468)5.3.11(2)中,最小上样量≤计划上样量≤最大上样量,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:

已采取的即时措施 Immediately Action Taken:

05/11/2021 07:09 PM (GMT+8:00) added by 晶晶 刘 (PID-000080):

上报上级、QA、MST,经讨论,载量虽然超出操作范围,但未超过CEX载量可接受范围

40.0~80.0g/L, 故最后决定继续生产, 仍进行2个cycle。MST 2021.05.11

即时措施附件 Immediately Action Attachment:

附件1 IBI308 2nd 阳离子上样理论载量计算批记录.jpg

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:

初步调查:

纯化人员按《信迪利单抗注射液(二代细胞株) M1b 3000L原液纯化批生产记录》(BPR100468/02)规定计算CEX理论上样量时发现,计划上样量为1055.53kg小于最小上样量1064.01,即CEX进行2个cycle层析柱理论载量为44.1g/L,不在操作范围44.4~74.4g/L范围内。纯化人员立即上报上级、QA、MST,经调查发现此异常

为PPQ期间PD、AS、QC等部门申请额外取样,澄清收获液:22L,亲和收集液:6.42L,低pH病毒灭活液:0.36L,吸附深层过滤上样液:4.1L,吸附深层过滤收集液:2.1L,阴离子上样液:42L,阴离子收集液:2.1L,阳离子上样液:18L,总取样蛋白量约为1 kg,约占当前CEX上样蛋白量的7%。

讨论后评估如下:若CEX步骤只进行1个cycle,将有约2.2kg蛋白不能进入Process,产品损失较大。若CEX步骤进行2个cycle,上样载量(CPP)为44.1g/L,低于操作范围44.4~74.4g/L,但在可接受范围40.0~80.0g/L内,最后决定进行2个cycle。所以决定生产现场对于CEX步骤继续按2个cycle进行。

产品质量影响评估:

DS2103014批次CEX步骤执行了2个cycle, CEX cycle1 实际上样载量为41.1g/L, cycle2实际上样载量CEX为46.6g/L(见附件2)。cycle1实际载量虽低于CEX载量(CPP)操作范围44.4~74.4g/L内,但在可接受范围40.0~80.0g/L,与上样前生产、QA、MST讨论预期一致。Cycle1实际载量计算涉及到数据和对应的测量设备信

息(见附件3)可知以上测量设备均在计量、PM有效期内,故cycle1的实际载量计算值41.1g/L是可靠的。



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根据PD的PC研究报告《IBI308下游纯化参数研究报告3000L(二代细胞株)》(IDC-PD-3-IBI308-R-022-00)中CEX载量可接受范围是40.0~80.0g/L,制定依据是:参数研究表明载量越高,聚合体含量越高,收率越高。根据PD的PC研究报告,本批次cycle1的实际上样载量41.1g/L不影响产品的质量,但CEX步骤收率可能会偏

低,对比IBI308二代细胞株3000L的历史批次载量和收率(见附件4),DS2103014批次CEX收率属于工艺的正产波动,且符合PD PC研究报告设定的收率可接受标准≥80.0%。

综上,本偏差对产品质量和CEX步骤收率没有影响。

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

对于后续IBI308 2nd PPQ3生产:在生产过程中,《信迪利单抗注射液(二代细胞株)M1b3000L原液纯化批生产记录》 (BPR100468/02)5.3.11(2)中CEX上样前有理论计划上样量判断(即理论上样载量判断),能够提前识别出CEX上样载量超出载量(CPP)操作范围44.4~74.4g/L风险;

商业化生产过程中验证取样较少,载量可控,故对后续商业化生产无影响。

综上所述,此次偏差对后续生产风险可控,影响较小。

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

根据《信迪利单抗注射液(二代细胞株)M1b 3000L纯化工艺验证方案》(VALP00281/01)7.9工艺验证成功的可接受标准中(1)所有关键控制:CPPs在相应的PAR范围内,IPC满足相应的可接受标准。而此次偏差主要偏差偏离点为计划上样量为1055.53kg小于最小上样量1064.01,偏离《信迪利单抗注射液(二代细胞

株)M1b3000L原液纯化批生产记录》(BPR100468)5.3.11(2)中,最小上样量≤计划上样量≤最大上样量,即CEX上样载量低于CEX上样载量的操作范围44.4~74.4g/L,但是符合CEX载量(CPP)的可接受范围40.0~80.0g/L,故此偏差对验证相关无影响。偏差的的发生原因为IBI308 2nd PPQ2生产期间在CEX步骤前,各个部门对于验证样品取样过多,原因明确。且此偏差对产品质量无影响、后续生产无影响以及验证方面无影响。回顾《信迪利单抗注射液(二代细胞株)M1b 3000L纯化工艺验证方案》

(VALP00281/01)、《信迪利单抗注射液(二代细胞株) M1b 3000L原液纯化

批生产记录》(BPR100468/02)、《信迪利单抗注射液(二代细胞株)3000L原液纯化工艺规程》(PFD00173/03)无控制流程缺失,无需建立相关CAPA项,故此偏差在第一部分进行关闭。

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

附件4 IBI308二代细胞株3000L的历史批次载量和收率.docx

附件2 阳离子实际上样载量.docx

附件3 数据测量相关设备信息.docx

偏差分级 Deviation Classification

偏差严重性 Deviation Severity:

DS2103014批次CEX步骤执行了2个cycle, CEX cycle1 实际上样载量为41.1g/L, cycle2实际上样载量CEX为46.6g/L(见附件2)。cycle1实际载量虽低于CEX载量(CPP)操作范围44.4~74.4g/L内,但在可接受范围40.0~80.0g/L,与上样前生产、QA、MST讨论预期一致。Cycle1实际载量计算涉及到数据和对应的测量设备信

息(见附件3)可知以上测量设备均在计量、PM有效期内,故cycle1的实际载量计算值41.1g/L是可靠的。

根据PD的PC研究报告《IBI308下游纯化参数研究报告3000L(二代细胞株)》(IDC-PD-3-IBI308-R-022-00)中CEX载量可接受范围是40.0~80.0g/L,制定依据是:参数研究表明载量越高,聚合体含量越高,收率越高。根据PD的PC研究报告,本批次cycle1的实际上样载量41.1g/L不影响产品的质量,但CEX步骤收率可能会偏

低,对比IBI308二代细胞株3000L的历史批次载量和收率(见附件4),DS2103014批次CEX收率属于工艺的正产波动,且符合PD PC研究报告设定的收率可接受标准≥80.0%。

综上,本偏差对产品质量和CEX步骤收率没有影响。

偏差发生率 Reoccurrence Probability of Deviation:

过去12个月未发生类似偏差。(关键词:IBI308二代细胞株,CEX,上样载量,操作范围)

偏差分级 Deviation Classification: Minor

分级的理由 Reason for Classification:

05/12/2021 08:49 PM (GMT+8:00) added by 晓军 吴 (PID-000095):

本偏差原因明确,对产品质量没有影响,且过去12个月未发生类似偏差,因此无需进一步调查,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:

本偏差原因明确,对产品质量没有影响,且过去12个月未发生类似偏差,因此无需进一步调查



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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:

IBI308 2nd PPQ2生产期间在CEX步骤前,各个部门对于验证样品取样过多,最终使得CEX步骤蛋白总量进行2个cycle纯化,上样载量低 于操作范围44.4~74.4q/L,但是符合CEX载量(CPP)的可接受范围40.0~80.0q/L。

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

原因描述 Cause Description:

IBI308 2nd PPQ2生产期间在CEX步骤前,各个部门对于验证样品取样过多,最终使得CEX步骤蛋白总量进行2个cycle纯化,上样

载量低于操作范围44.4~74.4g/L,但是符合CEX载量(CPP)的可接受范围40.0~80.0g/L。

原因分类 Cause Category 原因子分类 Cause Sub-Category Others

原因归属部门 Cause Department

Others N/A

缺陷描述 Defect Description:

2021.05.11 12:40 纯化人员在计算CEX理论上样量时发现,计划上样量为1055.53kg小于最小上样量1064.01,偏离《信迪利单抗 注射液(二代细胞株)M1b3000L原液纯化批生产记录》(BPR100468)5.3.11(2)中,最小上样量≤计划上样量≤最大上样

量,故发起偏差。

缺陷类型分类 Defect Category

缺陷类型子分类 Defect Sub-Category

Process Validation Production/Process

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个月未发生类似缺陷(关键词:IBI308二代细胞株,CEX,上样载量,操作范围),故非重复偏差。

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# **Record Status** 简短描述 Short Description

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:



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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/风险评估的	t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 Produ	ct Name:	信迪利单抗注射液M1b 3000L原剂	夜(二代细胞株))			
产品代码 Produ	ct Code	产品批号 Batch No.:	数量 Quantity		处理决定 Disposition		
DS01-308B-2		DS2103014	3000L		Release		
恶影响的物料 <i>信</i> !	自 Impacted Ma	aterial Information					
		steriai illiorillation					
物料名称 Mater	rial Name:						
物料代码 Produ	ıct Code	批号 Batch No.:		数量 Quantity			
受影响的溶液信息	息 Impacted Mo	edia/Buffer Information					
溶液名称 Media	a/Buffer Name:						
溶液代码 Media	a/Buffer Code:	批号 Batch No.:		数量 Quantity:			
受影响的设备信息	息 Impacted Eq	uipment Information					

偏差处理措施 Deviation Action Items

设备名称 Equipment Name:

设备代码 Equipment Code



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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#:

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# Record Type 简短描述 Short Description Record Status



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Record Status: Closed-Done

Record Status: Closed-Done						
Initial Approval						
QA Initial Review						
Area QA Initial Reviewed By:	吴, 烜	Area QA Initial Reviewed On:	2021.05.11 20:04			
Classify Completed By:	李, 四弟	Classify Completed On:	2021.05.13 13:13			
Department Initial Review						
Department Leader 1 Reviewed By:	康, 云	Department Leader 1 Reviewed On:	2021.05.13 15:37			
Department Leader 2 Reviewed By:	葛, 伟峰	Department Leader 2 Reviewed On:	2021.05.13 17:11			
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:	2021.05.13 13:18			
Quality Initial Approval						
Quality Approver 1 Approved By:	管, 国兴	Quality Approver 1 Approved On:	2021.05.13 17:59			
Quality Approver 2 Approved By:		Quality Approver 2 Approved On:	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 B	y:	Department Leader 1 Final Approved On:				
Department Leader 2 Final Approved B	y:	Department Leader 2 Final Approved C	Department Leader 2 Final Approved On:			
Department Leader 3 Final Approved B	y:	Department Leader 3 Final Approved C	Department Leader 3 Final Approved On:			
Department Leader 4 Final Approved B	y:	Department Leader 4 Final Approved On:				
Department Leader 5 Final Approved B	y:	Department Leader 5 Final Approved C	Department Leader 5 Final Approved On:			
Quality Final Approval						

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:



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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: