



DEPARTMENT OF HEALTH & HUMAN SERVICES

Handwritten: M 946N

Public Health Service

Handwritten: [Signature] BPR

APR 21 1997

Food and Drug Administration
2098 Gaither Road
Rockville MD 20850

VIA FEDERAL EXPRESS

WARNING LETTER

Dr. Emil Katz,
President and CEO
Novamed Ltd.
28 Pierre Koenig St.
Jerusalem 93469 Israel

Dear Dr. Katz:

During an inspection of your firm located at Jerusalem, Israel, on February 17 through 20, 1997, our investigator determined that your firm manufactures in vitro diagnostics, such as auto-immune disease test kits. These products are devices as defined by Section 201(h) of the Federal Food, Drug and Cosmetic Act (the Act).

The above stated inspection revealed that these devices are adulterated within the meaning of Section 501(h) of the Act, in that the methods used in, or the facilities or controls used for their manufacture, packing, storage, or installation are not in conformity with the Good Manufacturing Practice (GMP) for Medical Devices Regulation, as specified in Title 21, Code of Federal Regulations (CFR), Part 820, as follows:

1. Failure to establish and implement specification control measures to assure that the design basis for the device and packaging is correctly translated into approved specifications, as required by 21 CFR 820.100(a)(1). For example, there is no documented evidence that the ~~filling~~ filling system utilized to fill microtiter plate wells contained within Enzyme Immunoassay kits for the detection of auto-immune disease will consistently dispense the specified volume of Antigen solution. On 2/18/97 the filling system was demonstrated to provide an average fill volume of ~~the~~ the specification is ~~for~~ for well fill volume for catalog Nos. D-5001 and D-5002. (FDA 483 item 1)

Your response is not adequate. A procedure for the filling machine maintenance and calibration was submitted. No documentation was submitted for validation of the filling process to assure that the it was operating to specifications.

2. Failure to subject any change in the manufacturing process of a device to a formal approval process, as required by 21 CFR 820.100(b)(3). For example:

a. The Operating Procedure for the [REDACTED] Filling Machine does not reflect the current auto-immune kit microtiter plate fill volumes of [REDACTED] (FDA 483 item 2)

Your response appears to be adequate. You supplied a new procedure for the [REDACTED] Filling Machine.

b. The Operating Procedure for the [REDACTED] used for sealing the packaging of the microtiter plates for the auto-immune kits does not reflect all current vacuum level settings. (FDA 483 item 3)

c. Procedure No. 909: Preparation of Concentrated Assay Diluent for the DNP Kit (Catalogue #D-5004) states [REDACTED] the batch record specified [REDACTED] for green color. (FDA 483 item 4)

2b&c. Your response was not adequate. New procedures were not supplied, you plan to update all procedures during an ISO-9001 review at a later date.

3. Failure to maintain labels and labeling in a manner that provides proper identification and is adequately designed to prevent mix-ups, as required by 21 CFR 820.120(d). For example:

a. Stopping Solution labels awaiting production labeling operations, contained an inaccurate Lot Number (Rotavirus EIA, Catalog No. R-5178, Batch No. [REDACTED]). (FDA 483 item 5)

b. Sample Dilution Buffer was labeled with an inaccurate Lot Number that was released and distributed (Rota-dan Rapid EIA Kit, Batch No. [REDACTED]). (FDA 483 item 6)

3a&b. Your response was not adequate. You stated the Stopping Solution labels would have been examined during a final QC of the product before release. In addition you stated that label controls will be tightened, however no new procedures were submitted with the response.

Page 3 - Dr. Katz

This letter is not intended to be an all-inclusive list of deficiencies at your facility. The specific violations noted in this letter and in the FDA 483 issued at the closeout of the inspection may be symptomatic of serious underlying problems in your firm's manufacturing and quality assurance systems. You are responsible for investigating and determining the causes of the violations identified by the FDA. If the causes are determined to be systems problems, you must promptly initiate permanent corrective actions.

We acknowledge that you have submitted a response dated March 10, 1997, concerning our investigator's observations noted on the form FDA 483.

As discussed in the enclosed review, your response does not adequately address those violations relating to EIA for Quantitation of Autoantibodies to Deoxyribonuclearprotein (DNP), Rotavirus EIA, and Rota-dan Rapid EIA. No premarket submissions for devices to which the remaining GMP violations are reasonably related will be cleared until the violations have been corrected.

Federal agencies are advised of the issuance of all Warning Letters about devices so they may take this information into account when considering the award of contracts.

You should take prompt action to correct these and any other manufacturing or quality systems deviations identified by your internal audits. Failure to promptly correct these deviations may be identified in a followup inspection, and may result in the detention of your devices without physical examination upon entry into the United States.

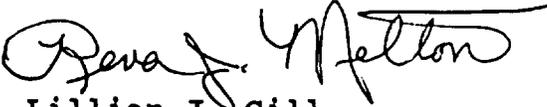
Please notify this office, in writing, within 15 working days of receipt of this letter of the specific steps you have taken to correct the noted violations, including an explanation of each of each step being taken to identify and make corrections to any underlying systems problems necessary to assure that similar violations will not recur. Please submit copies of the validation data and the procedures. Please include any and all documentation to show the adequate correction has been achieved. In the case of future corrections, an estimated date of completion, and documentation showing plans for correction, should be included with your response to this letter. If the documentation is not in English, please provide a translation to facilitate our review. Please address your response to:

Page 4 - Dr. Katz

Betty Collins, Chief
In Vitro Diagnostic Devices Branch
Food and Drug Administration
Center for Devices and Radiological Health
Office of Compliance
Division of Enforcement I
2098 Gaither Road
Rockville, MD 20850
USA

If you have any questions, please contact Robert G. Brett,
CSO at the above address. If you need assistance, contact
Mr. Brett at (301) 594-4588 or FAX (301) 594-4636.

Sincerely yours,

for/ 

Lillian J. Gill
Director
Office of Compliance
Center for Devices and
Radiological Health

cc: Scimedx Corp.
400 Ford Road
Denville, NJ 07834