



DEPARTMENT OF HEALTH & HUMAN SERVICES
Food and Drug Administration
New England District

Food and Drug Administration
One Montvale Avenue
Stoneham, Massachusetts 02180
(617)279-1675 FAX: (617)279-1742

WARNING LETTER

June 5, 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

NWE-07-97

Jeanne Leszczynski, Dr. P.H., Responsible Head
Massachusetts Department of Public Health
Biologics Laboratories
305 South Street
Boston, MA 02130

Dear Dr. Leszczynski:

The Food and Drug Administration (hereinafter "FDA" or "the agency") conducted an inspection of the Massachusetts Department of Public Health Biologics Laboratories (305 South Street, Boston, MA) between March 24 and April 2, 1997. During this inspection our investigators documented deviations from the applicable standards and requirements of Subchapter C, Parts 210 and 211, and Subchapter F, Parts 600—680, Title 21 Code of Federal Regulations (21 CFR), and the applicable standards of your license. These deviations cause your drug products to be adulterated within the meaning of Section 501(a)(2)(B) of the Federal Food, Drug, and Cosmetic Act (the Act) in that the controls used for the manufacture, processing, packing, or holding of these products are not in conformance with cGMP regulations. The deviations documented by our investigators in support of this finding include the following:

1. Failure to assure that the container closure systems can provide adequate protection against foreseeable external factors in storage and use that can cause deterioration or contamination of the drug product [21 CFR 211.94(b)], in that there was no data available to indicate that the closure integrity was maintained during the heat treatment of final containers, since drug product container and closure integrity testing was not performed.
2. Failure to establish and/or follow written procedures for production and process controls designed to assure that the drug products have the identity, strength, quality, and purity they purport or are represented to possess and to assure that such procedures, including any changes, are drafted, reviewed, and approved by the appropriate organizational units and reviewed by quality control [21 CFR 211.100]. For example:
 - a. the SOP [REDACTED] entitled [REDACTED] was not followed in that the residual supernatant is not collected [REDACTED] and is allowed [REDACTED] and
 - b. the SOP entitled [REDACTED] does not address serious adverse events resulting from blood borne viral transmissions.
3. Failure to provide separate or defined areas or such other control systems for manufacturing and processing operations as necessary to prevent contamination or mix-ups [21 CFR 211.42(c)], in that a gap or opening in the base of the autoclave in [REDACTED] allowed air to flow from an unclassified area to a class [REDACTED] room.
4. Failure to concurrently record each step in the manufacture and distribution of products [21 CFR 600.12(a)], in that the [REDACTED] has an acceptance criteria of [REDACTED], however, there is no temperature data for [REDACTED] for 1997.

In addition, any proposed manufacturing procedures and methods using or combining "recycled", "make-up", and/or rejected lots of product shall be reported to the Center for Biologics Evaluation and Research (CBER) as a supplement to the product license and may not become effective until notification of acceptance is received from CBER. We note your commitment to withhold recycled [REDACTED] from release and distribution.

Neither this letter nor the list of inspectional observations (Form FDA 483) is intended to be an all-inclusive list of deficiencies at your facility. It is your responsibility to ensure that your facility is in compliance with provisions of the Act and all applicable regulations.

Federal agencies are advised of the issuance of all Warning Letters concerning drugs so that they may take this information into account when considering the award of contracts. You should take prompt action to correct these deviations. Failure to do so may result in regulatory action by FDA without further notice. Possible actions include seizure and/or injunction, license suspension and/or revocation.

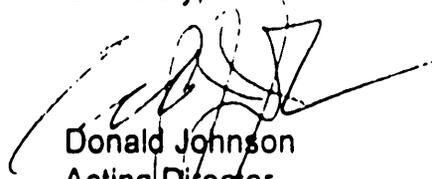
We acknowledge your April 23, 1997 response, which addresses the inspectional observations on the Form FDA 483 issued at the close of the inspection. It is currently under review. Corrective actions presented in that response may be referenced, as appropriate, in your reply to this letter, which should include any available supporting documentation.

You should notify this office in writing, within fifteen (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 step being taken to prevent the recurrence of similar violations. If corrective action cannot be completed within fifteen (15) working days, state the reason for the delay and the time within which the corrections will be completed. You should direct your reply to the attention of Mark Lookabaugh, Compliance Officer at the following address:

Food and Drug Administration
New England District Office
One Montvale Avenue
Stoneham, MA 02180

If you have any questions concerning this matter, please contact Mr. Lookabaugh at 617.279.1675 x118.

Sincerely,



Donald Johnson
Acting Director
New England District

bcc: State of MA (purged with cover letter from HFR-NE200), HFI-35 (purged), HFR-NE245 (purged), HFA-224, HFR-NE250, HFC-210 (with CFN: 12,70507), W/L File, CF, MCL, GTC, Hfd-RP, R File, L/R File, HFM-620, HFC-240 (COMSTAT: by CBER)

NWE: DJJ /  / EFG /  / MCL / mcl 5 June 1997

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