

DEPARTMENT OF HEALTH AND HUMAN SERVICES PUBLIC HEALTH SERVICE FOOD AND DRUG ADMINISTRATION		DISTRICT ADDRESS AND PHONE NUMBER US Custom House Room 900 Second & Chestnut Streets Philadelphia, PA 19106 (215) 597-4390	
NAME OF INDIVIDUAL TO WHOM REPORT ISSUED TO: <i>Frank W. Hatch, Ph. D</i>		PERIOD OF INSPECTION see below	C.F. NUMBER 2510184
TITLE OF INDIVIDUAL <i>Executive Director Research + Development</i>		TYPE ESTABLISHMENT INSPECTED Drug Manufacturer	
FIRM NAME McNeil Consumer Healthcare		NAME OF FIRM, BRANCH OR UNIT INSPECTED same	
STREET ADDRESS 7050 Camp Hill Road		STREET ADDRESS OF PREMISES INSPECTED same	
CITY AND STATE (Zip Code) Fort Washington, PA 19034		CITY AND STATE (Zip Code) same	
Period of Inspection: 2/9-11,14-18,-24,28 3/1-3,8,9/2000			
During an inspection of your firm we observed:			
1) The Motrin IB Gelcap manufacturing process deviates from the ANDA 73-019 in that most of the time [redacted] are used in [redacted] and they are not always [redacted]. The ANDA states, [redacted]. For example:			
a) In 1999 [redacted] compression batches used [redacted] and [redacted] compression batches used only [redacted] about [redacted].			
b) Compression batch [redacted] was initiated on [redacted] using granulation batch [redacted] and wasn't completed until [redacted] using granulation batch [redacted]. These are not [redacted] batches.			
c) Compression batch [redacted] was initiated on [redacted] using granulation batch [redacted] and wasn't completed until [redacted] using granulation batch [redacted]. These are not [redacted] batches.			
In addition, the current batch record allows space for up to [redacted] to be used for [redacted] compression batch.			
2) Reconciliation records for compression batches of Motrin IB cores are unclear in that compression batches do not clearly identify what granulation and how much was utilized, including samples collected and waste.			
3) Failures and deviations associated with process validation batches are not documented and investigated by Quality Assurance.			
4) Hold times have not been established for the following:			
a) Bulk Imodium AD Liquid before packaging.			
b) Unfinished oral dosage form cores before they are coated and before they are packaged.			
5) Qualifications for the [redacted] System are incomplete in that the Qualification Final Report was not prepared as required by the protocol. The Installation and Operational Qualifications was conducted by an outside vendor and signed off on 4/10/98 but was not approved by QA until 2/7/00. This system has been in place since 1987. In addition, there is no justification for the [redacted] cleaning of the [redacted] System.			
6) Calibration of the [redacted] for weighing contents of the mixing tanks are not consistent and written procedures are not specific to calibrate the [redacted] for the range of use. For example, [redacted] has a capacity of [redacted] and the calibration record of 1/27/00 shows that this [redacted] was calibrated at [redacted] and [redacted].			
7) There is no justification for cleaning the [redacted]. This is a dedicated piece of equipment for [redacted] into the [redacted].			
SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE <i>Debra S. Bennett</i> <i>Michele Gursiga</i>	EMPLOYEE(S) NAME AND TITLE (Print or Type) Debra S. Bennett, CSD YVONNE C. WOOD, Chemist MICHAEL GURSIGA, CHEMIST	DATE ISSUED 3/9/00

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- 8) SOP [redacted] is not being followed in that calibration specifications for calibrating mixers are not printed on the calibration work order. In addition, fixed speed mixers are not being calibrated. b4
- 9) There is no audit trail or documentation for when and who changed the Fluid Bed Dryers preventive maintenance procedures in the [redacted] System. This system monitors, schedules, and maintains all maintenance records for manufacturing equipment. b4
- 10) The approved Qualification Protocol for qualifying the new and upgraded [redacted] compression machines is missing. b4
- 11) The melting point apparatus in the R & D lab, which is used to qualify standards for the QC lab such as Pseudoephedrine-HCl, lot [redacted] is not adequate to determine accurate melting points. The lab sets up a beaker with oil in it, on a stirring hot plate with a calibrated thermometer. No USP melting point standards are run and the heat is not adequately controlled. The USP states that a controlled heat source be used to raise the heat by 1 to 2 degrees per minute when the temperature is near the melting point. b4
- 12) No wavelength calibration is being performed on the HPLCs in the R & D lab. [redacted] does not include wavelength calibration in it's yearly preventive maintenance check and McNeil only performs internal diagnostics, linearity and reproducibility, which is done at only one wavelength. SOP [redacted] dated [redacted] does prescribe wavelength calibration. HPLCs are used for method development of almost every product including, Motrin Oral Suspension, Motrin Drops, Children's Motrin Suspension, etc. b4
- 13) Calibration for the IR spectrophotometer is not being performed adequately. The specifications for the calibration of the [redacted] Infrared Spectrophotometer in the R & D lab, are too wide. SOP [redacted] dated [redacted] states that at [redacted] the tolerance is [redacted], at [redacted] the tolerance is [redacted], and at [redacted] the tolerance is [redacted]. The accuracy for the entire range of these instruments is [redacted]. The IR is used for identification test of new products and raw material standards. b4

Items corrected and verified: #1(d), 4a, 5 part 1, 6, 8, 13

Items corrected and not verified: #11, 12,

No Comment: #2. correction promised 4/1/00.

#3. corrections promised ASAP.

#4b: complete but implemented will phase

#5 part 2: justification of cleaning will be evaluated

#7 on-going need to be evaluated for corrections

GEN.	SPEC.
RELEASE	DATE 6/25/2010
F#	DATE
Reviewed by [Signature]	

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE Debra J. Bennett Yvonne C. Wood	EMPLOYEE(S) NAME AND TITLE (Print or Type) Debra J. Bennett, CSO Yvonne C. Wood, Chemist	DATE ISSUED 3/9/00
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