DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

DISTRICT OFFICE ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
FDA/CBER/OCBQ/DMPQ 10903 New Hampshire Avenue, Silver Spring, MD 20993 Attention: Carolyn Renshaw, Building 71 Room 4042 Telephone: 240.402.7343 Industry Information: www.fda.gov/oc/industry	8/21/2023-8/25/2023
	FEI NUMBER 3006500433

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT IS ISSUED

TO: Will Isom, Site Director

FIRM NAME	STREET ADDRESS
Charles River Laboratories Inc	4600 East Shelby Drive, Suite 108
CITY, STATE AND ZIP CODE Memphis, TN 38118-7427	TYPE OF ESTABLISHMENT INSPECTED Manufacturer

THIS DOCUMENT LISTS OBSERVATIONS MADE BY THE FDA REPRESENTATIVE(S) DURING THE INSPECTION OF YOUR FACILITY. THEY ARE INSPECTIONAL OBSERVATIONS; AND DO NOT REPRESENT A FINAL AGENCY DETERMINATION REGARDING YOUR COMPLIANCE. IF YOU HAVE AN OBJECTION REGARDING AN OBSERVATION, OR HAVE IMPLEMENTED, OR PLAN TO IMPLEMENT CORRECTIVE ACTION IN RESPONSE TO AN OBSERVATION, YOU MAY DISCUSS THE OBJECTION OR ACTION WITH THE FDA REPRESENTATIVE(S) DURING THE INSPECTION OR SUBMIT THIS INFORMATION TO FDA AT THE ADDRESS ABOVE. IF YOU HAVE ANY QUESTIONS, PLEASE CONTACT FDA AT THE PHONE NUMBER AND ADDRESS ABOVE.

DURING AN INSPECTION OF YOUR FIRM (I) (WE) OBSERVED:

Observation 1.
Failure to follow standard operating procedures related to facility and GMP operations. Specifically,
a. On August 22, 2023, during the inspection tour in the warehouse located at 5780 E Shelby Drive, Memphis TN, we observed that the rejected raw material in Room (b) (4) had no (b) (4) reject label, as stipulated in CRL SOP-0560 "Raw material disposition procedure" that requires all reject material to be labeled with (b) (4) reject label.

b. On August 23, 2023, during the Day 6 – (b) (4) of the DP ((b) (4)), the Line (b) (4) operator was observed not following aseptic procedures outlined in SOP-0511 "Aseptic Behavior (Revision: 03)", specifically steps 7.4.9, 7.4.10, 7.4.17.3 and 7.4.17.4. The following respective deviations were observed:

i. Operator did not have a defined "clean side" and "dirty side" while working inside the biological safety cabinet (BSC). Discarded waste (such as (b) (4) and (b) (4) wrappers) were (b) (4) of the BSC.
ii. The (b) (4) assembly was (b) (4) of the (b) (4) (b) (4) containing cell suspension and not at an angle, thus, disrupting First Air.
iii. The same (b) (4) assembly came into contact with the inside of the (b) (4).

c. On August 24, 2023, during observation of drug product endotoxin testing in (b) (4) Lab, we observed that SOP-0203 "Cleaning of the biological safety cabinet (BSC) – Non-GMP areas" Step 8.2.5 "Return the sash to its working height" was not properly followed after the interior walls of BSC were wiped. Sample handling was initiated with the sash above the working height.

d. Procedure to grant employee access to restricted areas is not followed, specifically, (b) (4) was not used as stipulated in SOP-0208 "Facility Access – Memphis (Revision: 02)".

Observation 2.
Appropriate containment of potential contaminates is deficient, specifically a (b) (4) of

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE	EMPLOYEE(S) NAME AND TITLE (Print or Type)	DATE ISSUED
	/S/	Prajakta Varadkar, Biological Reviewer, Wei Wang, Microbiologist, Hoda Abadeer, Consumer Safety Officer, Zhaohui Ye, Sr Staff Fellow, Jessica Chery, Staff fellow.	08/25/2023

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the (b) (4) Grade (b)(4) manufacturing suite and the Grade (b)(4) corridor for each of the (b) (4) Grade (b)(4) manufacturing suites ((b) (4)).

Observation 3.
Control of aseptic conditions within the Grade (b)(4) BSC are deficient. Specifically,
a. The cleaning and sanitization of various (b) (4) used in Grade (b)(4) BSC have not been validated.
b. The sterile (b) (4) do not (b) (4) and are exposed inside the Grade (b)(4) BSC during drug substance and drug product aseptic processing steps with (b) (4) operations.

Observation 4.
The Batch Production Record (BPR) and labels are not sterilized (e.g., by autoclave) prior to being transferred into the Grade (b)(4) cleanroom suite.

Observation 5.
Inadequate SOP. Specifically, CRL SOP-0667 "Cold Storage Alarm Response By (b)(6), (b)(7)(C) does not describe the temperature and the (b) (4) time limit when stored material is required to be moved to a new storage location upon freezer failures.

Observation 6.
Facility is not in a state of good repair, leading to pest control issues. Specifically, timely facility repairs at the warehouse located at 5780 E Shelby Drive, Memphis TN have not been performed. (b) (4) found rusted at the (b) (4) was left inadequately repaired since January 2023, along with (b) (4) in the (b) (4) and a (b) (4) in Room (b) (4). This caused an increase in insect and pest (rodent) infestations as described in pest control reports by pest control management vendor for the period covering April-June 2023. On August 24, 2023, during warehouse inspection, it was observed that the (b) (4) lacked a (b) (4) and had an (b) (4) (b) (4) allowing insects to enter the warehouse. Rust and damage were noted on the (b) (4), additionally a wasp nest was observed on the (b) (4).

Observation 7.
Visual inspection process qualification is deficient. Specifically, the defect challenge set used in training and qualification of the inspectors is not representative of final filled drug product vials, including clarity of solution,

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vial type, and size.

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The observations of objectionable conditions and practices listed on the front of this form are reported:

1. Pursuant to Section 704(b) of the Federal Food, Drug and Cosmetic Act, or

2. To assist firms inspected in complying with the Acts and regulations enforced by the Food and Drug Administration.

Section 704(b) of the Federal Food, Drug, and Cosmetic Act (21 USC 374(b)) provides:

"Upon completion of any such inspection of a factory, warehouse, consulting laboratory, or other establishment, and prior to leaving the premises, the officer or employee making the inspection shall give to the owner, operator, or agent in charge a report in writing setting forth any conditions or practices observed by him which, in his judgement, indicate that any food, drug, device, or cosmetic in such establishment (1) consists in whole or in part of any filthy, putrid, or decomposed substance, or (2) has been prepared, packed, or held under insanitary conditions whereby it may have become contaminated with filth, or whereby it may have been rendered injurious to health. A copy of such report shall be sent promptly to the Secretary."