

From: Alicea, Candido  
Sent: Wednesday, December 12, 2018 4:30 PM  
To: 'Joan.Robertson@grifols.com'  
Subject: Information Request # 11: STN 125683/0,Grifols Therapeutics LLC Immune Globulin Subcutaneous (Human), 20%, Action due date July 9, 2019

Our Reference: BL 125683/0

Dear Ms. Robertson:

We are reviewing your July 9, 2018, supplement to your biologics license application for Immune Globulin Subcutaneous (Human), 20%. We are requesting that you provide the following information:

1. Your acceptance criterion of  $\geq 25^{\circ}\text{C}$  for the temperature verification for the (b) (4) room is not correct and differs from the criterion in the IQ of (b) (4). Please correct this value. Also, please explain why an acceptance criterion of (b) (4) would be a satisfactory tolerance for a stipulated (b) (4) room.
2. The cleaning validation process of the (b) (4) does not include (b) (4) sampling of the (b) (4). Please provide an explanation of how you further ascertain that the (b) (4) are devoid of any remaining residues and operate correctly after your cleaning procedure. For example, a (b) (4) test would indicate any (b) (4).
3. All (b) (4) process validation runs included at least one incident/deviation regarding (b) (4). Incident #971692 in Run (b) (4) reports an OOS for (b) (4) and #1022698 indicates that the values for (b) (4) of the (b) (4) of Runs (b) (4) are missing. It is unclear to us if a run can be conducted without an incident or deviation. Also, it appears to us that an OOS should be listed as a deviation and not as an incident. Please provide an explanation as to why these incidents are not reported as deviations and why investigations and corrective actions are not being conducted to prevent these future OOSs and non-reporting incidents from occurring.

The review of this submission is on-going and issues may be added, expanded upon, or modified as we continue to review this submission.

Please submit your response to this information request as an amendment to this file by January 3, 2019 referencing the date of this request.

The action due date for this file is July 9, 2019

Warm regards,  
Candido

Cándido Alicea Ph.D.  
CDR, USPHS  
Regulatory Project Manager  
Center for Biologics Evaluation and Research  
Office of Tissues and Advanced Therapies  
U.S. Food and Drug Administration

10903 New Hampshire Avenue  
Silver Spring, MD 20993-0002  
Phone: 240-402-8310  
Fax: 301-595-1303  
candido.alicea@fda.hhs.gov

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