Considerations for Reference Standard Selection and Coverage Map for E&L in Medical Devices

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Disclaimer

The ideas expressed in this presentation are my own and do not necessarily reflect the views of Edwards Lifesciences.

Proposed Approach to Reference Standard Selection

Utilized For: Long-term implants to limited-use devices

Chemical Selection Guided by *a priori* **Information:**

Disclosed information (e.g., COA, SDS, Mfg Process, Patents) and Published literature

Historical data on our devices (e.g., feasibility, executed E&L studies)

Study Approach for Material/Component Analysis:

Individual material/component studies mimic ISO 10993-18 and FDA draft guidance design

Reference Standard Selection:

Based on all available information to match our extractable chemical space

Re-run characterization studies with standards as new chemical spaces are identified

Reference Standard Utilization:

Uncertainty Factor, calibration, system suitability precision and accuracy, and spike and recovery of manipulated device extracts at or below the study AET, and quantitation

 t -SNE-1

Cihan [Sorkun, M., Mullaj, D., Koelman, J., & Er, S. \(2022\). ChemPlot, a Python Library for Chemical Space Visualization. Chemistry–Methods, 2\(7\), e202200005\].](https://chemistry-europe.onlinelibrary.wiley.com/doi/10.1002/cmtd.202200005)

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Relative Response Factor and Variability

Relative Response Factor (RRF) and Uncertainty Factor (UF) Determination:

Calculated at the start of each analytical sequence per method as a function of the calibration for each Reference standard. Applicable only to that specific data set

Factors Affecting RRFs:

RRFs are a function of detection at that moment

Changes due to instrument differences, including model quirks and instrument health

Impacted by instrument health, unforeseen issues, and/or contaminants can dramatically alter RRFs

External Databases:

Not used as they do not account for normal variability and day-to-day changes

Determine UF each time data is collected for a curated set of Reference standards covering the expected chemical space (+)

RRF and UF Variability:

Studying RRFs over the years shows variability in internal standard corrected responses; Impacting study-UF

SVOC [GC-EI] UF: 2 to 4

NVOC [ESI+ and ESI- QTOF] UF: 2 to ∞

What is "Adequate" Coverage in the Context of E&L Studies?

Broad Detection:

Ensure that potential extractables are detected, especially those with toxicological significance

Use a range of Reference standards to cover the expected chemical space (+)

Proposed Quantitation Models:

Closest RT: Bracket non-targeted extractables (NTEs) with standards throughout the chromatography to ensure accurate retention time matching

Single Compound Quant: Select a compound that minimize the omission of relevant extractables from analytical evaluation thresholds (AET)

Similar Chemistry: Define criteria for selecting surrogate standards that are "similar" enough to the target compounds

Ionization Modeling: Modify ionization to apply effectively to the E&L space, ensuring that ionization efficiency is accounted for across different compounds

Toxicological Considerations:

Coverage should be sufficient to identify compounds with low tolerable intake (TI), which may require more stringent quantitation limits

Prior knowledge of extractables can help define the necessary coverage to meet safety and regulatory requirements

Instrument and Method Variability:

Account for variability in instrument performance and method sensitivity to ensure consistent and reliable quantitation across different runs and instruments

Kruve et al. Analytical Chemistry **2024** *96* (41), 16215-16226 DOI: 10.1021/acs.analchem.4c02902

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Proposed Visual Representations of Chemical Coverage

t-SNE Plots from SMILES/InChI Codes Ontological Taxonomy Using InChI Codes

Cihan [Sorkun, M., Mullaj, D., Koelman, J., & Er, S. \(2022\). ChemPlot, a Python Library for Chemical Space Visualization. Chemistry–Methods, 2\(7\), e202200005\].](https://chemistry-europe.onlinelibrary.wiley.com/doi/10.1002/cmtd.202200005)

Djoumbou Feunang, Y., Eisner, R., Knox, C. et al. ClassyFire: automated chemical classification with a comprehensive, computable taxonomy. J Cheminform 8, 61 (2016). https://doi.org/10.1186/s13321-016-0174-y

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Helping Patients is Our Life's Work, and

k, and
life is now

The use of the CLAP list: Coverage Maps, Databases and Beyond

DR PIET CHRISTIAENS, NELSON LABS

FDA Workshop (ASCA), November 06, 2024

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What is Generally Accepted as Minimum "Coverage" – Per Technique

Coverage per Technique

AET: The Practice in Non-Targeted Analysis *STEP 1: Use mean response of the population*

ISO 10993-18: "ideal situation is when mean response factor is 1"

$$
AET = DBT \times \frac{A}{BC}
$$

For **Targeted** Analysis with **Calibration Curves: No Uncertainty**

AET (with mean RF=1, no UF) would be 50% Not Underestimated/ Protective

AET: The Practice in Non-Targeted Analysis

STEP 2: Correct the mean response with UF to account for variation in Responses

$$
ET = \frac{DBT \times \frac{A}{BC}}{UF}
$$

How protective is the UF corrected AET ?

 $=$ $\overline{mean - SD}$

 \overline{A} .

mean

UF

1

 $-$ RSD

Coverage per Technique: The 84% rule

Assumes a Normal RRF distribution

- **Mean – 1xSD** offers 50% (mean) + 34.1% (1xSD) = 84.1% protectiveness,
- 84.1% of the population will have an RRF > mean-1xSD
- **currently accepted use of the uncertainty factor to correct the AET** (**mean/UF**) downwards offers **84.1% protectiveness – per Technique**

Hence, the *meaning that per technique 84.1% of the population will be detected above AET.*

However, currently there is no guidance for coverage of an overall orthogonal and complementary methodology

The 84% Rule in action: example for SVOC CLAP-Compounds

• Only GC/MS (SVOC)

• Mean RRF for NL-Database is about 10% lower than CLAP-List RRF (Contribution of Low LogP Compounds?)

• UF for NL database is 10% Higher than UF derived from RRF of CLAP-Compounds

• Difference: Physico-Chemical Properties in distribution? See later

Currently, there is no consensus on when to decide that a compound is not amenable to a certain analytical method and can be discarded from the population. **This is impacting the statistics & coverage calculations substantially**

CLAP: Nelson Labs RRFs per technique

- Record RRF of CLAP compounds for GC/MS and LC/MS (APCI + ESI)
	- \circ 90 of the 106 Compounds were in the Nelson Labs DB already, however, not always with full data
- Data for all 106 CLAP compounds (2 compounds are qualitatively detected)

Coverage map Nelson Labs database

- Nelson Labs data for CLAP Compounds
- Green: $RRF_{technique} > 0.1$
- **GCMS, LCMS-APCI± and LCMS-ESI±**
- Quantitative Coverage for 104/106 compounds
- 2 Compounds "Qualitatively" Detected *(no RRF, because of purity/solubility issues: technical grade)*
	- **TOTAL COVERAGE = 100%**

Obervation: RRFs are Protocol Dependent: example GC/MS

Comparison GCMS RRFs FDA vs Nelson Labs

- Substantial differences
- Possible causes:
	- o Injection technique
	- o Inlet temperature
	- o Injection volume
	- o Type of liner used
	- o Mass range
	- o Model of MS detector

CONCLUSION: RRF VALUES (AND ASSOCIATED UF-VALUES) ARE LAB SPECIFIC!!

NELSON LABS: EVALUATION OF FREQUENCY OF REPORTING - LAST 5 YEARS

370 Compounds represent 80% of all reported compounds (confirmed identity)

- o **6 CLAP-Compounds in TOP 10 frequency of reporting**
- o **17 CLAP-Compounds in TOP 25 frequency of reporting**
- o **23 CLAP-Compounds in TOP 100 frequency of reporting**
- o **61 CLAP-Compounds NOT in the top 370-list**

While the CLAP Compounds are relevant because (1) it are extractables, (2) their pchem properties are broad, they may not always represent the most frequently occurring compounds

PART 1

FDA's CLAP-List: Comparing Physico-Chemical Population Characteristics with Nelson Labs Data Base

Broad range of physicochemical properties/ CLAP vs NL DATABASE

A Sotera Health company

RRF versus LogP_{o/w}

A Sotera Health company

- **Clear relationship** between RRF and LogP_{o/w}
- Molecules with a **high hydrophilicity** (low LogP_{o/w} value): associated with **poor responders** in GCMS

PART 2

The Use of the **CLAP List** to support **Identifications** in NTA-Procedures, based on Mass Spectral Matching (GC/MS)

CLAP List and Identifications

Indirect benefit:

FDA Draft Guidance 2024

Supporting information^{96, 97} for identification can include one or more of the following:

- molecular formula generation (based on accurate mass) and/or confirmation (with an authentic reference standard of the candidate structure or a close structural analog)
- RT or retention index matching
- isomer assignment based on interpretation of data
- spectral interpretation (e.g., for MS spectra)
- fragmentation spectra interpretation based on data (e.g., for EI-based MS spectra)
- MSⁿ elucidation of fragments

Could be the basis to **establish acceptance/rejection criteria** for **Retention Index Confirmation**. However, more data would be needed than the current set of CLAP-standards

Retention Time as identification property

So Far, **Retention time** is merely a **'byproduct'** of Chemical Analysis

Retention Time

REASON: Retention Time depends on Scientific Protocol

(GC oven programme, stationary phase, carrier gas viscosity/velocity, column pressure...)

Retention Index as (more) universal retention property for GCMS

Kovàts Retention Index

= RT of compound relative to RT of linear alkanes

$$
I_x = 100n + \frac{100(t_x - t_n)}{(t_{n+1} - t_n)}
$$

Independent of GC oven programme

Still dependent on stationary phase

Source of Reference RI-Values: NIST23

1. Experimental RI-values:

- most accurate
- not for all compounds
- 2. Estimated RI-values: least accurate *(not taken into consideration)*
- **3. AI-RI-values**:
	- Accurate
	- all compounds!

Stationary phase categories

RI correlation Nelson Labs versus NIST – CLAP CGC/MS ompounds

- **Based on CLAP Compound list**
- NIST RI = **Preferably Experimental RI** (semi-standard non-polar), otherwise **AI RI**

Distribution RI errors Nelson Labs versus NIST

Nelson Labs SVOC CLAP only Nelson Labs SVOC all **GC/MS CLAP COMPOUNDS:** $<$ -100 -38 80% RI-Supported $[-95, -90]$ 94% RI-Supported / $[-85, -80]$ **|RIexp –RINIST| > 50 ID rejected** $[-75, -70]$ Accepted 11 $[-65, -60]$ $|11$ 6% False Negatives Ι9. $[-55, -50]$ _18 $\begin{array}{r} 34 \\ 31 \\ 36 \\ 48 \end{array}$ **20**≤**|RIexp–RINIST|**≤**50: ID accepted** $[-25, -20]$ **191**
191
192 232 345 $[-15, -10]$ **|RIexp –RINIST| < 20: ID SUPPORTED** $[-5, 0]$ 622 $[5, 10]$ -429 247 **NELSON LABS DATABASE:** $[15, 20]$ $\overline{176}$ $\overline{q_6}$ roc pot 80% RI-Supported (ΔRI<20) -61 **20**≤**|RIexp–RINIST|**≤**50: ID accepted** $\frac{39}{36}$ 94% RI-Supported / Accepted $[45, 50]$ (20≤ΔRI≤50) **PART** $[55, 60]$ -19 12 6% False Negatives (RI>50) $[65, 70]$ $[75, 80]$ $|RI_{exp} - RI_{NIST}| > 50$ ID rejected $[85, 90]$ $[95, 100]$ -25 -15 15 25 -5 5 Nelson Labs. Frequence (%) A Sotera Health company

(absolute counts indicated as category labels)

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2024 ASCA

Developing a Coverage Map for the Analysis of Extractables for Abbott Devices and the Analytical Testing Strategy

Siyi Zhang PhD Abbott Laboratories, Global Biocompatibility

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Extractables and Leachables Analysis BACKGROUND

BACKGROUND

Extractables and Leachables Analysis

Process to Develop a Extractables Coverage Map

Abbott Device Materials, Additives and Processing Aids

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Select Representative Surrogate Standards to Define the Chemical Space

Select Relevant Physicochemical Properties

Physical Properties

Melting Point Boiling Point Viscosity **Density** Polarity (Log P) Vapor Pressure Refractive Index

Chemical Properties

Acidity and Basicity (Pka) Flammability Reactivity

Molecular Attributes

Molecular Weight Ring plus double bonds

Correlates to Analytical Method Separation and Detection

Most Relevant Properties

Molecular Weight Boiling Point Log P

Other Relevant Properties Vapor pressure Pka

Developing Coverage Map

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Developing Coverage Map

160 Compounds in the Coverage Map

Optimize the Detection of Compounds in the Coverage Map

Analytical Method Considerations

- Comprehensive
- Sensitive Able to detect concentrations at AET
- Adequate accuracy for semi-quantification

Optimize the Detection of Compounds in the Coverage Map

Optimal Detection Range for GC Based Methods

Optimize the Detection of Compounds in the Coverage Map

Optimal Detection Range for LC Based Methods

Optimize the Detection of Compounds in the Coverage Map

Optimal Detection Range for LC Based Methods

Supplemental Analysis for Selected Compounds in the Coverage Map

Future Work

- Increase the number of surrogate standards in the coverage map to better understand the response factor (RF) variation
- Fill the "gaps" in the coverage map
- Expand the material/processing aid database
- Expand the coverage map for novel materials/processing aids
- Evaluate additional unique physicochemical properties that could provide insights into compounds' behavior
	- Vapor pressure
	- Pka

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Building a list of chemicals for assessment of extractables method coverage

Kevin Rowland Executive VP & General Manager 6 November 2024

Agenda

- **Background**
- **Relative Response Factor**
- **Determining Database Coverage**
- **Physicochemical Property Coverage**
- **Data Visualization**
- **Effects on omission of methods or properties on database coverage**

Relative Response Factor

Use of RRF Database for Coverage Determination

UFs applied: GCMS: 3, LCMS: 4, LC-UV: 2

Use of RRF Database for Coverage Determination

UFs applied: GCMS: 3, LCMS: 4, LC-UV: 2

Use of RRF Database for Coverage Determination

UFs applied: GCMS: 3, LCMS: 4, LC-UV: 2

Example Database

- **Constructed from authentic reference standards with high purity.**
- **RRF values determined based on calibration curve slope.**
- **Chemicals selected based on continuous coverage of properties:**
	- **Molecular Weight**
	- **Boiling Point**
	- **Log P**
	- **pKa**
	- **Vapor Pressure**
	- **Double Bond Equivalent (DBE)**

Physicochemical Properties

LogP Range

Polarity (LogP) range of compounds (-2.83 to 23.71) Ionizability range (shown as pKa) (pKa of -2 to 18.92)

Physicochemical Properties

Boiling Point Range

Volatility range (shown as boiling point) (67℃ to 1005.8℃) Volatility range (shown as Vapor Pressure in mmHG at 25℃)

℃) Vapor Pressure Range (mmHg at 25℃)

(0.000000044764 mmHg to 20,520 mmHg)

Physicochemical Properties

Molecular weight range (93.12832 Da to 1199.56052 Da) Aromaticity range (shown as double bond equivalents) (0 to 20)

Data Visualization

Effect of Methods

Effect of Limiting Properties

Observations

- **Determination of uncertainty factors based on coverage of a well-constructed database appears to be a robust approach**
- **Range of physical properties included is a logical way to evaluate the database construction.**
- **MS methods have RRF values that are difficult to correlate with a single property.**

Coverage provides a simple metric to communicate the effectiveness of the method, but only if the database is well constructed.

Properties included and the covered range of those properties are both important. Otherwise, apparent coverage is inflated.

Lack of simple property dependence suggests a group of properties is required to ensure chemical space is accurately described

Jordi DLabs