



PHARMA DEVILS

QUALITY ASSURANCE DEPARTMENT

QUALITY RISK ASSESSEMENT AND MITIGATION PLAN

QRA No.:

Name of Facility/Equipment/Utility/System/Activity/Procedure Unit Operation: Description: The objective of the risk assessment is to evaluate the risk associated during the Process Validation Batch of Lidocaine Injection 2% w/v 20 ml Injection	Date of Quality Risk Assessment:
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Sr. No.	Item/ Function	Potential Failure Mode (Failure Mode)	Potential Effect of Failure (Effect)	Potential Cause/ Mechanism of Failure	Current Control	Reference	S	O	D	Risk Priority Number (S*O*D)	Recommend- ended Actions (if any)	Post Risk			
												S	O	D	RP N S*O
1.	Dispensing stage- Before start of Dispensing	<ul style="list-style-type: none"> ➤ Unapproved material gets dispense ➤ Failed material get dispense 	<ul style="list-style-type: none"> ➤ Unapproved dispense material leads to product contamination. ➤ Fails to achieve the safety, efficacy and quality of product. 	<ul style="list-style-type: none"> ➤ Lack of Qualified source of API and Excipients. ➤ Lack of testing specification. ➤ Lack of vendor management procedure 	<ul style="list-style-type: none"> ➤ Qualification procedure is in place and also line clearance check point is available in BMR to ensure approved & release materials are available for dispensing. ➤ Testing specifications are in place. ➤ Vendor management procedure is in place. 	Vendor Management & SOP SOP	4	1	1	4	Adequate procedure no recommenda tion required	NA	NA	NA	NA



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2.	At the time of Dispensing	<ul style="list-style-type: none"> ➤ Fails to dispense the required quantity. ➤ Dispense material get contaminate. 	<ul style="list-style-type: none"> ➤ Inadequate result due to improper quantity dispensing and improper testing outcomes (OOS). ➤ Contamination of the area leads to product failure 	<ul style="list-style-type: none"> ➤ Due to selection of wrong capacity weighing balance. ➤ Due to lack of operational and calibration procedure of weighing balance. ➤ Due to improper environmental conditions. ➤ Due to lack of the operation and cleaning procedure for dispensing tools. ➤ Due to lack of procedure for dispensing ➤ Material dispensed by untrained personnel. ➤ No cross check during dispensing ➤ Unapproved/rejected material Dispensed. 	<ul style="list-style-type: none"> ➤ Selection of weighing balance is depending on balance capacity and quantity of material. ➤ SOP is in place for operation and calibration procedure of weighing balances. ➤ Environmental condition check point is in place in line clearance checklist. ➤ Uses and cleaning of dispensing tool SOP is in place. ➤ Dispensing of API, excipients and PM SOP's are in place. ➤ Training has been imparted to concerned personnel's. ➤ In dispensing activity done by and checked by provision is available in BMR and verification done by before compounding. ➤ Check point is in place in BMR to check material is approved/released. 	Operation & Verification of Balances	3	2	1	6	Adequate procedure no recommenda tion required	NA	NA	NA	NA



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3.	Component preparation	➤ Failure of Component preparation and sterilization.	➤ Improper cleaning and sterilization of component leads to contamination in product.	<ul style="list-style-type: none"> ➤ Due to lack of unqualified sterilizer. ➤ Lack of component cleaning and component sterilization procedure. ➤ Steam lack or utility cut off during sterilization phase. ➤ Articles cleaning and sterilization by untrained person. ➤ Load pattern may not follow. ➤ Selection of wrong recipe. ➤ Sensor malfunctioning. ➤ Due to sterilization, equipment hold time cross 	<ul style="list-style-type: none"> ➤ Qualification of sterilizer has been completed. ➤ Component cleaning and sterilization SOP is in place. ➤ If the steam lack occurs during sterilization phase, alarm has been generate and same acknowledged by operator and cycle considered as abort. ➤ Training has been imparted to all concerned persons. ➤ Validated load patterns have been refers before start of activity as per respective SOP. ➤ Validated recipe and parameter has been set in autoclave PLC and controlled through password. ➤ Defined frequency in place for schedule calibration, Preventive maintenance and validation status. ➤ Sterilized hold time has been established and actual equipment hold time is track in BMR. 	Operation and Cleaning of Autoclave Cum Bung Processor	3	2	1	6	Adequate procedure no recommenda tion required	NA	NA	NA	NA



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4.	During Filter Integrity testing	➤ Failure in filter integrity	➤ Improper filter integrity gets direct impact on sterility of product.	<ul style="list-style-type: none"> ➤ Unqualified equipment used. ➤ Lack of cleaning and operational SOP. ➤ Filter integrity activity performed by untrained person. ➤ No cross checks provision for filter integrity test report. 	<ul style="list-style-type: none"> ➤ Qualification of filter integrity machine has been completed. ➤ Cleaning and Operational SOP is in place ➤ Training has been imparted to all concerned persons and user ID given after completion of training. ➤ Filter integrity test report (Pre and Post) has been checked by production person and verified by QA person. 	Operation of Integrity Tester	4	3	1	12	Adequate procedure no recommendation required	NA	NA	NA	NA
5.	Filtration activity	➤ Failure in filtration of bulk solution	<ul style="list-style-type: none"> ➤ Filtrate is not sterile leads to microbial growth. ➤ Improper filtration leads to contamination in product. 	<ul style="list-style-type: none"> ➤ Lack of procedure for sterilization of filter. ➤ Lack of procedure to check the filter integrity. ➤ Due to improper training to concerned persons. ➤ Lack of filtration procedures. 	<ul style="list-style-type: none"> ➤ SOP is in place for SIP of vessel system along with product transfer line. ➤ Filter integrity procedure is in place check points is available. ➤ Training procedures is in place. ➤ Filtration procedure is available in BMR. 	SIP for Mixing Vessel/ MMV/ Holding Vessel/Buffer Vessel	4	2	1	8	Adequate procedure no recommendation required	NA	NA	NA	NA



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6.	During compounding	➤ Failure in Batch manufacturing	➤ Due to improper manufacturing procedure leads to Bioburden may increase more than specification. ➤ Unexpected outcome like yield and concentration of product leads to product failure.	➤ Compounding procedure not available. ➤ Due to lack of calibration, preventive maintenance, operational and cleaning procedures. ➤ Qualification of vessel system not available. ➤ Unsterilized and unclean equipment may use. ➤ Inadequate cleaning or equipment's difficult to clean. ➤ Compounding activity handle by untrained person. ➤ Due to lack of clean equipment hold time may cross.	➤ Detail, compounding procedure is in place in BMR. ➤ Vessel calibration, preventive maintenance, operational and cleaning procedure are in place. ➤ Qualification of vessels system is completed. ➤ In line clearance of compounding activity ensures the sterilization vessels has been mention in BMR. ➤ Vessels CIP, SIP procedure are qualified and SOP is in place. ➤ Training has been completed for all concerned persons. ➤ SIP hold time has been established. ➤ Water system, compressed air and Nitrogen are qualified.	Load Cell Verification of all vessels	4	2	1	8	Adequate procedure no recommendation required	NA	NA	NA	NA



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7.	Bulk Hold	➤ Failure in Bulk Hold	➤ During bulk solution hold period Bioburden may increase more than the specification.	➤ Lack of qualification of vessel system. ➤ Lack of aseptic connection. ➤ Lack of positive pressure. ➤ Due to failure of filter integrity of vent filters. ➤ Lack of provision to monitor the pressure in vessel. ➤ Due to activity handle by untrained person. ➤ Lack of established bulk hold time.	➤ Qualification of the vessel system has been completed. ➤ Aseptic connection for filtration is defined in BMR. ➤ The vessel is closed system and operated through control HMI. The vessel kept under positive pressure during bulk hold which does not allow the infiltration of microbial contaminants. ➤ Magnehelic gauge is there for monitoring the pressure ➤ Training procedure is in place for operation of the vessel.	Handling of Filters	4	3	1	12	Adequate procedure no recommendation required	NA	NA	NA	NA
8.	Vial Washing	➤ Failure in washing	➤ Improper washing procedure leads to contamination ➤ Due to improper cleaning particulate matter may presence in vials and leads to failure in visual inspection.	➤ Lack of qualified equipment. ➤ Lack of operational procedure. ➤ Due to activity handled by untrained person. ➤ Due to lack of cleaning operation and preventive maintenance procedure. ➤ Due to improper utility supply.	➤ Qualification has been completed for vial washing machine. ➤ Operational SOP is in place. ➤ Training has been imparted to concerned persons. ➤ Cleaning, operational and preventive maintenance procedures are in place. ➤ SOP is in place for parameter of utility supply.	Operation and Cleaning of Vial Washing Machine	5	1	1	5	Adequate procedure no recommendation required	NA	NA	NA	NA



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												S	O	D	RP N S*O
9.	Tunnel operation	➤ Failure in vials depyrogenation	➤ Improper depyrogenation leads BET and Sterility Failure. ➤ Failure in tunnel leads to loss of time and resources.	➤ Unqualified equipment may use. ➤ Lack of cleaning and operational procedure. ➤ Untrained person may operate machine ➤ Tunnel temperature and DP fluctuation during batch activity ➤ Selection of wrong parameters and recipe ➤ Sensor malfunctioning.	➤ Qualification has been completed for tunnel. ➤ Operational SOP is in place. ➤ Training has been imparted to concerned persons. ➤ Cleaning SOP is in place. ➤ Tunnel conveyer belt stop automatically if sensor temperature goes out of set point.. ➤ Defined frequency is in place for schedule calibration, temperature sensor, Preventive maintenance and validation status of tunnel sterilizer. ➤ Validated recipe and parameter is in place.	Operation of Cleaning of Sterilizing & Depyrogenation Tunnel	5	2	1	10	Adequate procedure no recommendation required	NA	NA	NA	NA



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10.	Filling operation	➤ Failure in filling and stoppering	<ul style="list-style-type: none"> ➤ Improper filling may result in volume variation. ➤ Improper filling and stoppering activity may leads to contamination. 	<ul style="list-style-type: none"> ➤ Lack of qualification procedure. ➤ Lack of cleaning and operational procedure. ➤ Unsterile parts or article may use I filling operation. ➤ Lack of environmental condition for filling. ➤ Improper handling of aseptic intervention may lead to product contamination. ➤ Operation handled by untrained and unqualified person. ➤ Due aseptic interventions ➤ Due filling duration. 	<ul style="list-style-type: none"> ➤ Qualification of filling and stoppering machine has been completed. ➤ SOP for filling machine cleaning and operation is in place. ➤ Sterilization procedure for machine parts loads is in place. ➤ Filling shall be carried out under class A condition (Unidirectional air flow area) ➤ Aseptic intervention shall be performed as per media fill protocol and BMR. ➤ Operational training has been done for all concerned persons for aseptic. ➤ Filling duration is mentioned in BMR and same was simulated in media fill. 	Operation and Cleaning of Vial filling machine	5	1	2	10	Adequate procedure no recommendation required	NA	NA	NA	NA



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11.	Visual Inspection	➤ Failure in visual inspection	➤ Improper visual inspection of vials leads to direct impact on product quality and patient safety. ➤ Improper visual inspection to vials gets market complaints to the organization.	➤ Lack of qualification procedure for visual inspector. ➤ Lack of SOP for visual inspection procedure. ➤ Visual inspection activity done by unqualified person. ➤ Lack of cross check procedure for inspected vial. ➤ Visual inspection hood not qualified. ➤ Lack of required lux level.	➤ Visual inspector qualification procedure is in place. ➤ SOP is in place for Automatic optical inspection activity. ➤ Qualification has been completed for concerned persons. ➤ In process checks is in place for visual inspection activity and AQL is in place.	Operation Cleaning of Automatic Visual Inspection Machine	3	2	1	6	Adequate procedure no recommendation required	NA	NA	NA	NA
12.	Storage condition in FG	➤ Improper storage space and conditions in finished goods store.	➤ Chance of product mix-up due to lack of dedicated space. ➤ Chance of product degradation due to irrespective storage condition.	➤ Lack of SOP ➤ Lack of dedicated storage space ➤ Due to environmental condition not maintain.	➤ SOP for handling of finished goods is in place. ➤ Dedicated storage space is available. ➤ Environmental condition is monitoring through BMS.	Handling of Finished Goods	2	2	1	4	Adequate procedure no recommendation required	NA	NA	NA	NA



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												S	O	D	RPN S*O
13.	Labeling Activity	➤ Improper Labeling in Product.	➤ Improper labeling leads to adverse effect on patient health.	➤ Lack of SOP of Labeling machine ➤ Lack of Line clearance and physical verification. ➤ Lack of proper Dispensing of Packing material.	➤ SOP of labeling machine is in place. ➤ Training imparted to IPQA person for Line clearance and proof check. ➤ SOP of Packing material Dispensing is in place.	Dispensing and Issuance of Packing Material	2	2	1	4	Adequate procedure no recommendation required	NA	NA	NA	NA
14.	Secondary Packing activity	➤ Improper packing of the product.	➤ Improper packing leads to product damage. ➤ Wrong packing leads to risk on patient safety.	➤ Lack of SOP of carton packing ➤ Lack of Line clearance and physical verification. ➤ Lack of proper Dispensing of Packing material.	➤ SOP of operation and cleaning of Hi-cart carton packing machine is in place. ➤ Training imparted to IPQA person for Line clearance and proof check. ➤ SOP of Packing material Dispensing is in place.	Operation and Cleaning of Hi-cart Cartoning Machine	2	2	1	4	Adequate procedure no recommendation required	NA	NA	NA	NA

Where: S=Severity; O=Occurrence Probability; D=Detection; Risk category 1-25 RPN is Low risk, 26-50 RPN is Medium Risk, 51-125 RPN is High Risk.

Name of Facility/Equipment/Utility/System/Activity/Procedure/Unit Operation: Process Validation For Liquid Injection			Date: NA		
S. No.	Recommended Action	Responsible Person	Target Date of Completion		
1.					
2.					



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CAPA:
If required, mention CAPA No.:

Quality Risk Management Team			Reviewed By Head Operations Sign & Date	Approved By Head QA Sign & Date
Name	Department	Sign & Date		

QUALITY RISK ASSESSEMENT AND MITIGATION SUMMARY REPORT

Name of Facility/Equipment/Utility/System/Activity/Procedure:	Process Validation Batch of Lidocaine Injection 2% w/v 20 ml Injection
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Verification of Action Plan: NA

Remarks (if any): The entire above failure mode and their Severity, Occurrence, Detection rating done and RPN No. is found between 1-25. Hence Risk is detected as low which is acceptable.

Verified By
QA
Sign & Date

Approved By
Head QA
Sign & Date