

FOI 6/98

Tetrionics Inc.
Madison, WI 53711
ID 12/17/97 CRC

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Summary of Findings

This inspection of a prospective manufacturer of _____ was conducted as a follow-up to an earlier FDA inspection of 7/97. The finished product _____

supply the _____ This firm will synthesize and _____ During the 7/97 inspection, several inspectional observations were noted and discussed with the firm. Immediate corrections were promised by the firm and the purpose of this follow-up was to determine if suitable corrective actions have indeed been enacted.

Credentials were shown and FDA482 issued to Mr. Herbert E. Paaren, Vice President of the corporation. Mr. Peter O. Johnson, President of the corporation is not present at the firm on a daily basis and was not present during this inspection. According to Mr. Paaren, he himself is actually the person most responsible for day to day operations. He added that there have been no changes to the firm's ownership, responsible parties or corporate standing since the last inspection. Also present during this inspection were Christopher M. Henrich, QC, and Katherine J. Beardsley, Director of Regulatory Affairs. All three of these individuals answered questions and supplied document copies as requested.

This inspection was limited in scope and covered only the firm's correction of the previous FDA483 items.

#1. There is no documentation showing the _____ procedures for the finished _____ product have been validated.

The firm has corrected the above situation in the following manner. Immediately following the inspection they made contact with th _____ who was contracting the work. They discussed the amount of activity _____ would be required to perform in order to validate the system and allow for mini validations before or during each set of tests and lab determined that they could not perform these tasks. After this, the firm decided that other tests were available to them including the two that they settled upon for release testing. The firm now performs several tests in addition to appearance including _____ The firm no longer employ _____ to perform _____ testing on a routine basis.

The firm has purchased instruments to enable them to perform these tests in house. These are on line and these tests have been performed retrospectively on all finished batches of finished product (using retain samples). These instruments include _____

by _____, installed by _____ installed

The firm has updated the _____ and has reportedly submitted the above changes to FDA CDER. I reviewed the _____ and it appears satisfactory.

The firm has constructed adequate SOP's to cover these changes and for performing suitable validation of the systems. This appears to have been successfully completed.

#2. Identification tests conducted on many incoming components are general in nature and non-specific to a component.

The firm no longer employs the use of _____ testing. The firm has purchased two instruments that are now used to determine identity of incoming raw materials. These, as described in #1 are a _____. The firm has created a change form and updated its SOP regarding its _____ specifications, whereby it dropped the requirement for _____, which it agreed was not a real good indicator and now do either or both of the above, per the schedule. Attached as Exhibit #1 is a copy of that section of the change request and SOP that describes the new changes.

The firm initially compared its _____ and is in the process of putting together its own _____. The only item that has no published _____ is the finished product. Since the early batches have been tested by other means and accepted as the standard, they are using the _____ as a standard. In any case, the firm is constructing _____ using all _____ for comparison.

Th _____ that compares the _____ to all available _____ (that product), chooses _____ the highest degree of match and compares against that standard. In addition, it rates the degree of certainty of match using a numeric scale. The firm does not currently rely on this feature, choosing instead to review the _____, generally by _____. However they are attempting to validate the _____. Their current SOP states the test _____ should match the _____ and should generally appear similar to the standard. It appears the firm has corrected this area of concern.

#3. No testing is done on _____, nor is any C of A received _____ before release and use. This component is used to _____ product in the _____ container during packaging.

The firm has requested and has received a Cof A covering the lot _____ that they have currently in use. In addition, they have constructed a series of ID tests to be done in house prior to approval of the product for use, including _____ All raw materials are now received under Cof A.

#4 _____ component has been released without meeting _____ or without documentation (deviation report) allowing for release and use.

The firm determined before the inspection that _____ they had listed in their SOP was not suitable for this material. A retrieve of historical data indicated that none of the _____ batches in this parameter, _____ The firm has since created deviation reports to cover these situations and has changed the specification to delete this test and add a test b _____. Since that time, the firm has purchased the equipment and retrospectively tested samples from each of the _____ and has found them suitable for use. It appears the firm has corrected this deficiency.

#5. Calibration weights used to calibrate in-house scales / balances are not documented as traceable to NIST standards nor have they been recalibrated at the required time interval.

The set of calibration weights were returned to _____ who certified them against NIST traceable standards. The firm now has written certification of the testing and the individual results of testing. All of the weights passed the certification. This deficiency has been corrected.

I made a brief walk thru inspection of the rest of the facility and found no obvious problems. No objectionable conditions were noted and it appears that the firm has adequately corrected / addressed the problems reported during the earlier inspection.

Attachments

Exhibit #1....Change form and a portion of SOP showing addition of additional ID tests.



Charles R. Cote, RIC
Madison, WI RP

UIN: 2131129
cc: MAD-PP
HFO-324

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Minneapolis District
240 Hennepin Avenue
Minneapolis, MN 55401
Telephone: 612-334-4100

FOI 6/98

Date: January 22, 1998

Peter O. Johnson, Sr.
President & CEO
Tetronics, Inc.
University Research Park
505 Science Drive
Madison, WI 53711

Dear Mr. Johnson:

A Good Manufacturing Practice (GMP) inspection was conducted at your bulk pharmaceutical facility on December 17, 1997 as follow-up to an inspection performed on July 29-30, 1997. The inspection included review of your firm's corrective action implemented for GMP deficiencies uncovered during the previous inspection and review of the inspection reviewed your firm's ability to manufacture and test bulk

GMP deficiencies uncovered during the previous inspection were found to be corrected during the most recent inspection. Your approach to implement corrective action is viewed highly by the Agency. An was submitted to the Agency and is under review by the Center For Drug Evaluation and Research.

We understand that you have ar on site and that your firm no longer perform for identification of th

We also understand that your firm will no longer use the as a contract laboratory for testing on a routine basis.

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It is your responsibility to ensure that all of the requirements of the Federal Food, Drug and Cosmetic Act and regulations promulgated thereunder are being met. Based upon the inspectional findings and filing of your _____, the application _____ was recommended for approval at the District level on January 22, 1998. Final authority for approval of this application lies with our review division in the Center For Drug Evaluation and Research.

Sincerely yours,



James I. Roberts
Acting District Director
Minneapolis District

skt