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CUTTER BIOLOGICAL

MILES LABORATORIES, INC FOURTH AND PARKER STREETS POST OFFICE BOX 1986 BERKELEY, CALIFORNIA 94701 REGULATORY AFFAIRS (415) 420 5183

July 7, 1987

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Plasmapheresis C. Trappa K. Fischer S. Bhonsie B. Beden/. D. TerEbeo/ H. Bae L. Abrus C. Moore Author Chron File Route

Elaine C. Esber, M.D., Director Office of Biologic Research and Review Parklawn Building 5600 Fishers Lane HFN-825 Rockville, MD 20857

RE: Cutter System of Plasmapheresis

Dear Dr. Esber:

In response to your letter dated June 8, 1987, I am enclosing CSOP 262, Revision 7, for your review and comments. This has been changed to require notification of Cutter if any HIV positive units were shipped during the previous six months.

Also, CSOP 262, HBsAg, HIV, ALT and ANTI-D Test Results and Actions on Reactive Results, has been rewritten to incorporate the use of a Disposition Checklist.

Sin GRO-C

Moske M. Sternberg, Ph.D. Vice President, Research & Development Responsible Head, Regulatory Affairs

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C	UTTER BIOLOGICAL	: Document No: : CSOP 262	: Rev: 7	-
PLASMA	PROCUREMENT DOCUMENT	:Date:	,	-
Document Type: CUTTER SY	STEM OF PLASMAPHERESIS	:Prepared By:	GRO-C	_
Subject:	T and ANTI D TEST DESIGN TO	:Approved By	GRO-C	-
and ACTIO	LT and ANTI-D TEST RESULTS NS ON REACTIVE RESULTS	:Approved F	GRO-C	•
Responsibility:	Center Manager or Trained Design			i
Laboratory (	ohone call from testing laborator STL) will telephone if any test i Anti-D reactive.	y. The Special To s determined to be	esting HBsAg,	
2. Record inform Checklist.	nation from STL on Section 1 of U (Form 81-9739). USE ONE FORM PER	DONOR.	a - Disposition	れ
3. Use the Apper to determine	ndix to this procedure, entitled action to be taken on donor and	Action on Reactive donor's plasma.	Results,	
Number any of	a Donor's Record (Form 81-9711) b ther unacceptable units. Enter i of Form 81-9739.	y Donor Number and nformation on thes	i Control se units	2
5. Perform action form as action	ons listed in Section 3 of Form 8 ons are completed.	1-9739, dating and	i initialing	2
start of the Biological, H donors testin Form 81-9739.	thin two hours of STL phone call next business day, telephone Pla erkeley, if any prior units have g HIV or Anti-D reactive. (CSOP so far completed, to Plasma Prop of phone call.	sma Procurement, ( been shipped to ( 268.) Send conv	Cutter Cutter from	R
. Within 24 hou Record and pe	rs of STL phone call, record rea rmanently defer donor.	ctive test result	on Donor	7
Within 24 hou for HBsAg, HI	rs of STL phone call, update per V and ALT reactive donors.	manent deferral fi	les: "Viral"	R
date line. L	ate unit of plasma as reactive of rt Form and draw a single line t ocate Plasma Packing and Test Re Step 4 of this procedure and lin	nrough entry. Ind port Forms for any	tial and	
0. Within 24 hou in Step 4 fro	rs of STL phone call, remove all m their original cartons in the	available units i freezer.	dentified	æ
<ol> <li>Immediately d a large X dra</li> </ol>	eface Source Plasma label of uni- wn with a felt-tipped pen.	t(s) to be destroy	red with	
<ol> <li>Quarantine pl clearly marke</li> </ol>	asma schedule for destruction in d "Possibly Reactive Plasma - DO	a sealed or locka NOT SHIP."	ble container	112
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- 13. Destroy reactive units within two working days of phone call from STL. (Plasma to be destroyed at a hazardous waste disposal facility must be picked up at first opportunity, preferably within seven working days of phone call from STL.)
- Destroy plasma. (See CSOP 265.) Enter destruction information on reverse side of Unacceptable Plasma - Disposition Checklist.
- Ensure HIV-reactive donors are counseled by physician or trained designate next visit.
- 16. Receive original Plasma Packing and Test Report form from STL containing HBsAg, HIV and ALT test results, and Titer Sample Packing List containing Anti-D results.
- Compare original Plasma Packing and Test Report Forms with appropriate photocopies to be sure that testing is complete on all samples listed.
- 18. Ensure individual units of plasma on which HBsAg, HIV, ALT or Anti-D testing is incomplete, i.e., marked "QNS" or "sample missing", are not shipped until negative results are received.
- 19. Discard photocopy of Plasma Packing and Test Report form.
- 20. Plasma initially reported as QNS or sample missing, but later reported negative:
  - 20.1 If original cartons have been shipped, add unit(s) to another Plasma Packing and Test Report form of the sample Plasma Type and Donor Code and ship on next regular shipment. In space headed Results, write "HBsAg, HIV and ALT Negative." Initial and date line.
  - 20.2 Attach original test results to Plasma Packing and Test Report Form containing the appropriate unit(s).
- 21. Sort quarantined plasma by double-checking that all reactive units and any other indicated units have been removed from original cartons and that reactive result is entered in Donor Record. Person performing double checks must be someone other than person who removed unit. Initial and date entries on Plasma Packing and Test Report Form, Donor Record, Unacceptable Plasma - Disposition Checklist and Plasma Destruction Record to indicate double checks have been performed; therefore, two initials required. The double checks for accuracy and completeness are a vital step in this procedure and must be done promptly and carefully.
- 22. Transfer all plasma with negative test results from quarantine area of freezer to portion of walk-in freezer reserved for plasma to be shipped.
- 23. Ship complete week numbers of plasma on next regular shipping day, or as directed by Manager, Plasma Procurement, Cutter Biological.

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24. Retain in quarantine area of freezer all plasma with incomplete test results and any plasma collected subsequently from the same donor.

25. Retain, on permanent file, photocopies of completed Plasma Packing and Test Report Forms, any test results received from the STL, and two copies of Unacceptable Plasma - Disposition Checklist: the original to be filed in donor's chart and one copy to be maintained as a Plasma Destruction Record. In addition, copies of the form should be attached to each Plasma Packing and Test Report Form from which units listed on the form have been deleted, even if the form is only partially completed at time of shipment.

26. Send report of reactive test result to Public Health Department, if required.

PRECAUTION: Checking for accuracy and completeness of original Plasma Packing and Test Report Forms with retained photocopy of Plasma Packing and Test Report Forms is a vital step in this procedure, and must be done promptly and carefully!

## 27. APPENDIX

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27.1 Unacceptable Plasma - Disposition Checklist (Form 81-9739).

**27.2 ACTION ON REACTIVE RESULTS** 

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## **Cutter** Biological UNACCEPTABLE PLASMA — DISPOSITION CHECKLIST

( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( )	Date:			Time:			
DONATION D	ATE DON	IOR NO.	CONTROL NO.	PLASMA	TYPE	WEEK NO.	CARTON NO
HBsAg +		ALT + disposed o	ANTI-D+	(Circle as appropriate) by Cutter:	OTHE	R (specify)	
DATE OF DONATION	DONOR N	0.	CONTROL NO.	PLASMA TYPE	WEEK NO.	CARTON NO.	SHIPPING DATE
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er a Brand			5	на н			
				- <u>-</u> -			
ACTION:			· · · ·		DATE:	INITIAL	
	Plasma Procure		r HIV and Anti-D Units)				S: INITIAI
Telephone Call to Donor Record Up Donor Suspended	Plasma Procure dated:	•••••					.S: INITIAI
Telephone Call to Donor Record Up Donor Suspended Donor Added to P Copy of Packing L	Plasma Procure dated:	t File By: .		····			.S: INITIA
Telephone Call to Donor Record Up Donor Suspended Donor Added to P Copy of Packing I Plasma Removed	Plasma Procure dated:	t File By: . ase:		·····			
Telephone Call to Donor Record Up Donor Suspended Donor Added to P Copy of Packing I Plasma Removed Plasma Unit Label	Plasma Procure dated:	t File By: . ase:		·····			
Telephone Call to Donor Record Up Donor Suspended Donor Added to P Copy of Packing L Plasma Removed Plasma Unit Label Plasma Quarantine Plasma Destroyed	Plasma Procure dated: ermanent Rejec .ist(s) Revised: . from Original C Defaced: ed:	t File By: . ase:	):				
Telephone Call to Donor Record Up Donor Suspended Donor Added to P Copy of Packing I Plasma Removed Plasma Unit Label Plasma Quarantin Plasma Destroyed Picked Up by Haz	Plasma Procure dated: ermanent Rejec list(s) Revised: . from Original Ce Defaced: ed: (Run No. DR ardous Waste C	t File By: . ase: ompany:	):				
Telephone Call to Donor Record Up Donor Suspended Donor Added to P Copy of Packing L Plasma Removed Plasma Unit Label Plasma Quarantine Plasma Destroyed C Picked Up by Haz MD Counseled Hit Plasma Packing at	Plasma Procure dated:	t File By: . ase: ompany: Form(s) Ret	):				

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Please complete Plasma Destruction Record (over).

## Cutter Biological PLASMA DESTRUCTION RECORD (Minimum 15 PSI for 2 Hours)

Date	Date .			Time	of Day	- F	Pressu n PSI	at			1. 	
	Plasma Collected	Control Number	Run Number	Heat Start	Reach 15 PSI			120	Heat	Total Time	Initials	Double Check Initials
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		Anti-D Reactive	Destroy or divert from Cutter	Destroy or divert from Cutter		Destroy or divert from Cutter all units in-house and call Cutter on any other units donated previously.	Permanent Deferral	N/A	N/A
		<u>(ALT 2-5)</u>	Destroy or di- vert from Cutter	If unit(s) are non-reactive and donor has tested reactive for first time in 30 days: No action.	Even if unit(s) are non-reactive, if donor has tested reactive for second time in 30 days: Destroy or divert from Cutter	No action	No action	Permanent Deferral	No action
	ACTION ON REACTIVE RESULTS	ALT Reactive (>5)	Destroy or divert from Cutter	Destroy or divert from Cutter		No action	Permanent Deferral	N/A	N/A
	ACTIO	ΔĦ	Destroy	Destroy		Destroy units in-house. Call Cutter If any units were shipped to Cutter during previous 6 months.	Permanent Deferral	N/A	V/N
		HBSAg	Destroy	Destroy		No action	Permanent Deferral	N/A	V/N
		PLASMA	i. Reactive unit:	. Subsequent units:		Previous units:	l. First Reactive	Second Reactive within 30 days	Second Reactive > 30 days apart
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